

Stevenage Borough Local Plan

# Public Examination

Matter 18 Statement

February 2017



## Stevenage Borough Local Plan 2011 – 2031 - Public Examination

### Statement by Stevenage Borough Council (SBC)

#### Matter 18 – Employment and mixed use site allocations and protected employment sites

##### NB: SBC responses set out in blue font

**1. Are the proposed employment and mixed use site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts?**

- 1.1. As discussed under Stage 2, Matter 10 (Q3), the SBLP takes into account a wide range of evidence studies when considering the sites to be allocated for development.
- 1.2. Our Sustainability Appraisal ([LP3](#)) has assessed the effects of options/policies within the SBLP throughout the plan-making process, including the specific employment and mixed use allocations, as well as the release of Green Belt required to accommodate some of these allocations. The SA concludes that the approach taken in the SBLP would provide significant positive economic and social impacts (p79) but recognises that potential for negative environmental impacts and that site specific implications need to be fully considered. Further evidence studies have ensured the sites have been fully assessed and that the options identified are the most sustainable and appropriate.
- 1.3. The Strategic Land Availability Assessment (SLAA) ([ER3](#)) identifies a long list of potential development sites within the Borough and assesses whether these are suitable, available and achievable for development. However, this tests suitability in simplistic terms and on an independent basis. Further work has been carried out, in the form of the Employment Technical Paper ([TP1](#)), to consider these sites alongside each other and to reconcile any potential competing and conflicting objectives, ensuring the most appropriate overall balance is achieved.
- 1.4. Sites in the SLAA are categorised into four different land types; Previously developed land, Greenfield sites within the urban area, Greenfield sites outside of the urban area and Green Belt sites. This allows for a sequential approach to be taken when considering the results of the Assessment, with the use of Brownfield sites first (Employment SLAA, [ER3](#), para 6.5 – 6.9). The SBLP has exhausted all possible opportunities in terms of using previously developed and Greenfield sites (Employment Technical Paper ([TP1](#)), p3.9 – 3.17). All positively assessed sites from the SLAA have been brought forward for employment use, where possible, and only one has

been excluded, where it was not clear that site specific constraints could be overcome. This includes the allocation of a Green Belt site, as justified by the Green Belt Technical Paper ([TP3](#)), which sets out the demonstration of exceptional circumstances.

- 1.5. The Infrastructure Delivery Plan (IDP) sets out the infrastructure likely to be required across the borough. This was produced in consultation with infrastructure providers, who were provided with the draft site allocations for assessment purposes. Strategic Policy SP5 and detailed infrastructure policies within the plan seek to ensure that any infrastructure required to support the proposals is provided. All of the allocated sites have been assessed within the transport modelling carried out to inform the Local Plan (ED126).
- 1.6. In terms of flood risk, the Level 1 SFRA ([E2a](#) and [E2b](#)) concludes that the majority of the development sites allocated in the SBLP are at low risk of flooding and that, with appropriate flood management and mitigation solutions, these sites would be acceptable for the development purposes for which they are allocated.
- 1.7. Two of the employment sites: Land West of North Road (EC1/4) and Land West of Junction 8 (EC1/7) were found to be at higher risk of flooding and were assessed as part of a Level 2 SFRA ([E3a](#) and [E3b](#)). This concluded that the types of developments proposed in the SBLP (p50, Table 7-1) are compatible with the level of flood risk.

## **2. Does policy EC1 contain sufficient information in relation to the allocated sites?**

- 2.1. Yes. The Borough Council considers Policy EC1 contains sufficient information in relation to the allocated sites.
- 2.2. The Policy sets out the level of floorspace we would expect to be achieved on each site and the types of uses required.
- 2.3. The Policy deliberately excludes jobs numbers, as these do not provide a reliable basis for determining site capacity. Commercial units are often developed on a prospective basis, without having an end user in mind. As such, it would be very difficult to assess the number of jobs likely to be provided and whether this was in accordance with the policy, at the detailed application stage. Floorspace figures provide a more reliable approach, which is not dependent upon the end user of the site.

- 2.4. It is considered other policies in the plan provide sufficient guidance relating to potential site specific requirements, such as SUDS and access arrangements.

### **3. What is the expected timescale for development, is this realistic?**

- 3.1. A full assessment of suitability, availability and achievability was carried out within the SLAA ([ER3](#)). All sites are considered to be deliverable within the plan period.
- 3.2. The Borough has a healthy turnover of employment land. Although there are a small number of employment sites within the Borough that have been vacant for some time, this not due to a lack of demand for employment land in general terms, it is due to the sites not being able to accommodate the type of uses required within the Borough, or landowners not choosing to bring them forward.
- 3.3. Delivery of the SBLP employment sites will be reviewed via the Authority Monitoring Report, on an annual basis.

### **4. What are the implications of the identified employment land needs not being met within the Borough's boundaries?**

- 4.1. As discussed at Stage 2, Matter 10 (Q4), the Council acknowledges it is unable to meet the full employment needs of the Borough.
- 4.2. An update to the Employment Technical Paper ([ED124](#)) identifies that the shortfall in provision being made by the SBLP will be approximately 11.5ha.
- 4.2. This means that Stevenage will be reliant on its neighbours under the Duty to Co-operate.
- 4.3. The Functional Employment Market Area Study (FEMA) ([ER1](#)) identifies that Stevenage is located within a wider A1(M) corridor market area. It recognises that Stevenage is unlikely to be able to meet its needs, but that both North Hertfordshire (NHDC) and Central Bedfordshire (CBC) are likely to have a significant surplus of employment land to meet their own growth requirements over their respective plan periods (para 6.44).
- 4.4. The shortfall in provision has been discussed with authorities within the FEMA and, although further details will need to be clarified, both NHDC and CBC have agreed to make provision on behalf of Stevenage (MoU

with NHDC, [ED130](#); MoU with CBC, [ED140](#)). Both have sites of over 20ha in size that have the potential to meet some, or all, of Stevenage's needs. As such, this provides the opportunity for the full employment land needs to be met within the FEMA.

- 4.5. As explained further in the SBC response to Matter 2 (question 7), the nature of the commuting flows between Stevenage, NHDC and CBC, mean that this would not have significant (if any) negative impact in terms of sustainable travel patterns, and may provide the opportunity to improve self-containment within NHDC and CBC.

**5. *What are the implications of Welwyn Hatfield Borough Council refusing to assist with providing employment land to meet some of the unmet demand from Stevenage Borough?***

- 5.1. As discussed at Stage 2, Matter 10 (Q5), at the time the Local Plan was published for Publication consultation, Stevenage's shortfall in employment provision had been discussed in some detail with NHDC, CBC and Welwyn Hatfield (WHBC). All three authorities had identified a surplus of employment land within their authorities, over and above what was likely to be required to meet their own needs.
- 5.2. We considered a commitment from all three authorities was beneficial in terms of allowing flexibility (as NHDC and WHBC were at an earlier stage in the plan-making process<sup>1</sup>). However, in reality, this would have provided much more floorspace than the shortfall identified in Stevenage.
- 5.3. The FEMA study ([ER1, para 7.14](#)) identifies that whilst Stevenage has a significant shortage of employment space over the plan period, both NHDC and eastern CBC have a large surplus of supply to support their own growth requirements (equivalent of well over 11.5ha at the time of study preparation).
- 5.4. As such, the loss of commitment from WHBC should not impact upon the ability of Stevenage to meet its identified shortfall of provision in other local authority areas.

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<sup>1</sup> Prior to the withdrawal of the CBC Local Plan.

**6. Does this have implications for Central Bedfordshire and North Hertfordshire who have agreed to assist in this regard? Do they now need to contribute more than previously agreed and if so has this been discussed? How will this be secured and when?**

- 6.1. As discussed in response to Stage 2, Matter 10 (Q6&7), prior to, and since, the publication of the SBLP, the Borough Council has been in discussions with both NHDC and CBC with regards to employment provision.
- 6.2. Both local authorities agreed to make employment provision to meet the needs of the Borough Council. An exact level of provision was never agreed. However, a shortfall of around 14 hectares (taken from the FEMA study, [ER1](#), para 5.52) was used as a starting point for discussions. This is higher than the shortfall identified in the updated Employment Technical Paper ([ED124](#)) of approximately 11.5ha, which takes into account updated employment supply/completions data and considers the impact of the new EEFM data released in August 2016.
- 6.3. Both NHDC and CBC have confirmed that they are still happy to contribute towards meeting Stevenage's needs (MoU with NHDC, [ED130](#); MoU with CBC, [ED140](#))<sup>2</sup>. Their sites have the potential to provide in excess of the land that is actually required, either singularly or in combination. Both areas fall within the wider A1(M) corridor market area within which Stevenage operates from a FEMA perspective.
- 6.4. The employment site in Baldock has been allocated in the publication version of the NHDC Local Plan.
- 6.5. Central Bedfordshire Council are at an earlier stage in plan preparation, however, previous work on a withdrawn Local Plan demonstrated that their employment needs could be met within their area and their response to the SBLP consultation indicates that they have an adequate surplus of land to provide for Stevenage's needs.
- 6.6. Discussions will be ongoing with both authorities.

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<sup>2</sup> These agreements were based around the 14ha shortfall, as previously discussed. The updated 11.5ha shortfall figure has now been shared with both NHDC and CBC and discussions will be ongoing, however, as it is a lower figure, it is not envisaged that this will cause any problems.

**7. Does this need to be reflected in the Plan?**

- 7.1. As discussed in response to Stage 2, Matter 10 (Q8), Policy SP3 of the Local Plan clearly sets out the Council's intention that additional employment land should be provided outside of the Borough, by local authorities within the FEMA, and that further work will be required in terms of liaising with these authorities. The Local Plan cannot include policies relating to areas outside the administrative area of Stevenage Borough. Thus it is considered that the approach taken goes as far as Stevenage Borough Council can go in terms of securing this provision.
- 7.2. In support the SBLP, MoU's have been signed with both NHDC ([ED130](#)) and CBC ([ED140](#)), to provide an additional level of certainty with regards to this matter.



## **EC1/1 – GSK/Stevenage Bioscience Catalyst**

### **1. Could the site accommodate more than the target provided in the Plan (50,000 sq m)?**

- 1.1. The site allocation under EC1/1 is reflective of planning permissions already granted on this site. The existing permissions are part implemented, with some work already completed.
- 1.2. The site is owned by a single landowner (GSK), who has not advised that the land would be available for higher density uses. The Hertfordshire LEP's Strategic Economic Plan (SEP) ([ER6](#)) places great importance on this area as a focus for R&D and pharmaceuticals within Hertfordshire. Due to the nature of the businesses occupying this site, EC1/1 is a secure site and would not be suitable for accommodating the majority of other general employment uses.
- 1.3. In line with this, the provision of employment land at this site is not assumed to make a significant contribution towards the trend-based requirements identified for the Borough by the EEFM modelling. As explained in the Employment Technical Paper ([ED124](#), para's. 3.5 – 3.7), this provision is considered to be a 'policy on' response. As such, its contribution towards the trend based requirement has been reduced to just 4,000m<sup>2</sup> in table 3.1. Accordingly, as the site is limited to R&D / pharmaceuticals / closely related uses, allocating a higher target to this site, would not meet any more of the Borough's need for employment land, and will still require additional provision to be made elsewhere.
- 1.4. The site is also constrained by access arrangements. Designing an appropriate access for the site, to enable the floorspace proposed has been a complex task. Discussions have previously been held with HCC, as the Highways Authority and Highways England, due to the site's impact on J7 of the A1(M). A solution was eventually agreed, which involves a phased programme of works, including improvements to the J7 roundabout and a major reconstruction of the GSK roundabout (Broadhall Way/Gunnels Wood Road) once a certain level of development is reached. Further investigation would be required in order to determine whether a higher capacity could be achieved on this site.

## **2. Could the site accommodate a wider range of uses?**

- 2.1. The GSK/Stevenage Bioscience Catalyst site is owned entirely by one landowner (GSK) and provides a specialist R&D location, as supported by the Hertfordshire LEP's Strategic Economic Plan (SEP) ([ER6](#)).
- 2.2. The site constrained by the need for strict security measures, due to the nature of the existing uses. As such, it cannot accommodate a wider range of uses.

## EC1/4 – Land west of North Road

### 1. Will this proposal limit the future expansion of Lister Hospital?

- 1.5. As discussed in our response to Q1 under HO1/11 (Matter 16), Policy HC3 seeks to protect the existing healthcare uses and allocates an undeveloped parcel of land, which has the potential to be used for future expansion of the hospital, if required. This response also confirms that the NHS Trust have not provided any evidence to show that a hospital expansion is likely to be, or is capable of being, delivered within the plan period. No funding has been identified.
- 1.6. As such, the allocation of EC1/4 for employment use does not have any impact on the future of the Lister Hospital. The adjacent site to the south (HO1/11), which separates this site from the hospital, is being allocated for residential use, so it would not be logical to provide for hospital expansion here, even if a need had been proven.

### 2. Has flood risk been fully considered? If so, are there any outstanding issues in this regard?

- 2.1 The flood risk<sup>3</sup> associated with development at land west of North Road is fully considered in the Level 2 SFRA ([E3a](#) and [E3b](#)), section 4.3 and para 4.3.2.
- 2.2 Table 1 summarises the conclusions in the SFRA for the 'less vulnerable'<sup>4</sup> use proposed at land west of North Road and Map 1 shows the extent of flood risk on site.

Table 1 – EC1/4 summary of conclusions

Flood Zones	Flood Zone 1	Flood Zone 2	Flood Zone 3	Flood Zone 3b
Area of extent	4.93ha	0.94ha	0.89ha	0ha
'Less Vulnerable' suitability	✓	✓	✓	x

<sup>3</sup> Fluvial, surface water and groundwater

<sup>4</sup> NPPF Vulnerability classification

Map 1 – EC1/4 flood risk extent



2.3 The SFRA recommends that development of land west of North Road includes:

- Deculverting the Ash Brook ordinary watercourse that runs adjacent to the site boundary
- The sequential approach to development allocation;
- A detailed drainage strategy as part of a site specific FRA report;
- The consideration of SuDS at all stages of the planning and design process to reduce surface water runoff to less than greenfield runoff rates.
- The setback of development to a minimum of 8 metres from the bank of the Ash Brook.

### **3. Would the proposal result in highway safety issues that could not be mitigated?**

- 3.1. No. It would not give rise to any highway safety issues that could not be mitigated.
- 3.2. We are satisfied that this site can be connected by active travel routes to the wider Stevenage active travel network. North Road can accommodate a dedicated active travel route. North Road is also an existing bus route; the 55 service covers the urban area of Stevenage including Lister Hospital, Stevenage Railway Station and Stevenage Bus Station and the town of Letchworth.
- 3.3. As an employment site, a range of travel planning measures are available, including the Stevenage SmartGo scheme, which offers a range of travel benefits and services to help make travel cheaper and easier for employees, this includes the promotion of lift share.

- 3.4. Access to the site will be from North Road and will require appropriate coordination of the provision of access points to complement the approach to development to the east of North Road. The Council is working with the highway authority and is confident that a coordinated approach will be achieved.
- 3.5. The developer will be required to design the development, the access arrangements, and the management of the site in such a way as to maximise the propensity for use of sustainable modes of travel. It will be required to demonstrate the effectiveness of the measures that it proposes to achieve this, and commit to implementation of such measures.

**4. *Is the proposal likely to affect any protected species?***

- 4.1. No issues relating to protected species have been raised via the consultation process, and the landowner (the HCA) has not advised of any protected species on the site.
- 4.2. An ecological assessment, or an EIA, will be required prior to work starting on this site.

## **EC1/7 – Land west of Junction 8**

### **1. Do exceptional circumstances exist to justify the removal of the site from the Green Belt?**

- 1.1. Yes. The Green Belt Technical Paper ([TP3](#)) sets out the exceptional circumstances that exist to justify the removal of this land from the Green Belt.
- 1.2. The Part 2 Green Belt Review ([GB2](#)) identifies this site, parcels W2(i) and N5(ii) within this review, as making only a 'limited contribution' to four out of the five Green Belt purposes, with no 'significant contribution' identified. It concludes that both land parcels are remnant parcels, strongly enclosed on all three sides by the transport network, making their connection to the wider countryside limited. It recommends these sites for release from the Green Belt within the plan period.

### **2. Would the proposal result in highway safety issues that could not be mitigated?**

- 2.1. No. It is not considered that it would give rise to any highway safety issues that could not be mitigated.
- 2.2. We are satisfied that a choice of mobility options will be available for employees to access the site. The nearest bus stop is on Stevenage Road, a short walk from the site, where the existing bus routes 80 and 101 are available. The 80 service covers the urban area of Stevenage including, Stevenage Railway Station and Stevenage Bus Station, and the town of Hitchin. The 101 serves the urban area of Stevenage and the towns of Hitchin and Luton.
- 2.3. As an employment site, a range of travel planning measures are available, including the Stevenage SmartGo scheme, which offers a range of travel benefits and services to help make travel cheaper and easier for employees, this includes the promotion of lift share.
- 2.4. Access to the site is proposed to be taken from Stevenage Road via a priority junction with a right turn ghost island. The proposed site access would be compatible with the existing junction of Stevenage Road/Chantry Lane immediately to the west.
- 2.5. A similar highway access scheme was considered by Hertfordshire Highways for a waste use in 2012 and it was considered that access to Stevenage Road was acceptable in principle.
- 2.6. It is considered that the majority of traffic would access the site from the east (i.e. Stevenage or the A1(M)) and would therefore turn left in and right out of the site access. Limited traffic would turn right into the site from Stevenage Road and therefore it is considered that junction spacing with the Chantry Lane junction would not cause a capacity or safety issue.

- 2.7. Vehicular access under the A602 can be safely managed with one way shuttle working. The underpass is of sufficient width and height to accommodate emergency vehicles and operational vehicles in accordance with current design standards.
- 2.8. The developer will be required to design the development, the access arrangements, and the management of the site is such a way as to maximise the propensity for use of sustainable modes of travel. It will be required to demonstrate the effectiveness of the measures that it proposes to achieve this, and commit to implementation of such measures.

**3. Has flood risk been fully considered? If so, are there any outstanding issues in this regard?**

- 3.1 The flood risk<sup>5</sup> associated with development at land west of Junction 8 is fully considered in the Level 2 SFRA ([E3a](#) and [E3b](#)), section 4.3 and para 4.3.4.
- 3.2 Table 2 below summarises the conclusions in the SFRA for the 'less vulnerable'<sup>6</sup> use proposed at land west of North Road and Map 2 shows the extent of flood risk on site.

Table 2 – EC1/7 summary of conclusions

Flood Zones	Flood Zone 1	Flood Zone 2	Flood Zone 3	Flood Zone 3b
Area of extent	3.99ha	0.88ha	0.77ha	0ha
'Less Vulnerable' suitability	✓	✓	✓	x

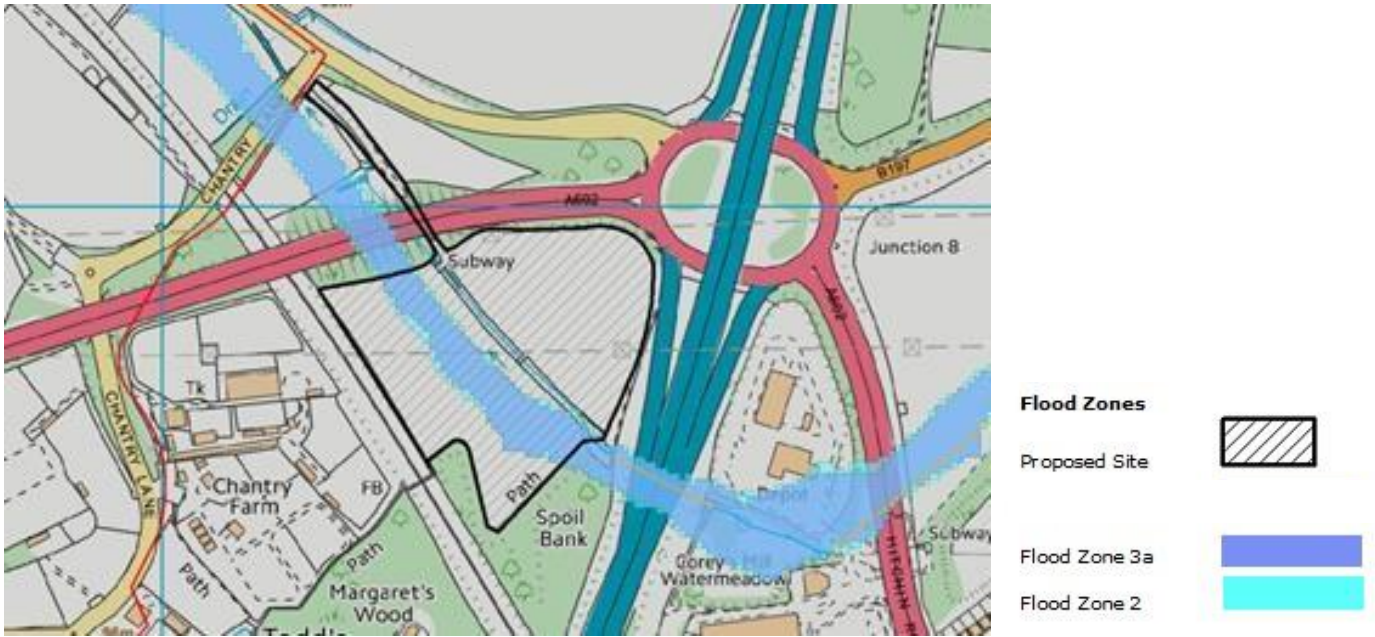
- 3.3 The SFRA recommends that development of land west of Junction 8 includes:
- The sequential approach to development allocation;
  - A detailed drainage strategy as part of a site specific FRA report;
  - The consideration of SuDS at all stages of the planning and design process to reduce surface water runoff to less than greenfield runoff rates.
  - The setback of development to a minimum of 8 metres from the bank of the Ash Brook.

Map 2 – EC1/7 flood risk extent

<sup>5</sup> Fluvial, surface water and groundwater

<sup>6</sup> NPPF Vulnerability classification





**4. Is the proposal likely to affect any protected species?**

- 4.3. No issues relating to protected species have been raised via the consultation process, and the landowner has not advised of any protected species on the site.
- 4.4. An ecological assessment, or an EIA, will be required prior to work starting on this site.



## **EC2, 3, & 4 – Gunnels Wood**

### **1. *Should non-employment uses be permitted in this area?***

- 1.1. The SBLP seeks to protect the existing Employment Areas of Gunnels Wood and Pin Green. Gunnels Wood is the largest employment area in Hertfordshire, accommodating a number of international companies and UK headquarters.
- 1.2. The separation of employment uses into a distinct zone was a key part of the original Masterplan for Stevenage. It has also, more recently, been supported by businesses within Gunnels Wood, when setting out our case for an exemption from Office to Residential PD Rights, which was successful. They argued that allowing non-employment uses within the Employment Area would have a negative impact and result in a domino effect, causing businesses to move out and the local economy to significantly worsen.
- 1.3. In line with the NPPF, the SBLP sets out a proactive approach to planning for a successful economy. As explained in para's. 5.23 – 5.27 of the SBLP, our identified employment needs are unable to be met entirely within the Borough and we are relying on our neighbours to bring forward additional employment land to make up this shortfall. As such, to avoid making this situation worse, it is important to retain all employment land that currently exists within the Borough.
- 1.4. Policies EC2 to EC4, therefore, only allow for B-Class Uses to be permitted within Gunnels Wood. They do not allow for non-employment uses in this area.
- 1.5. Paragraph 6.14 of the supporting text to Policy EC2 recognises that, longer-term, it may be beneficial to the economy of the Borough and it may align with town centre regeneration plans, to consider non-employment uses within this area of Gunnels Wood. This is in accordance with the NPPF, which supports a flexible approach to allow for changing economic circumstances and the avoidance of the long term protection of sites, if there is no reasonable prospect of sites being delivered.
- 1.6. The recently opened Airbus Foundation Discovery Space STEM centre provides a good example of this. This provides an educational facility associated with the existing Airbus employment site, linking with nearby North Hertfordshire College. Although this was considered to be ancillary to an existing use and so would be allowed under Policy EC2, it is a significant investment in the town and will help to achieve key objectives of the SBLP in improving educational attainment, improving the economy,

as well as providing jobs. As such, we would not want to see important facilities such as this turned away due to restrictive Local Plan policies.

- 1.7. However, due to the limited employment land in the Borough, we did not want to risk a further loss of employment provision by allowing exceptions within the policy itself, without any control.
- 1.8. This way, non-employment uses remain to be an exception to policy and can be subject to strict control by the Borough Council, based on an up-to-date assessment of supply and demand at that time.

## **2. *Would the second part of policy EC4 prejudice existing properties?***

- 2.1. A key aim of the SBLP employment policies is to focus the high intensity uses in the most accessible part of Gunnels Wood (the Edge-of-Centre Zone). This aligns with the sustainability objectives of the SBLP as a whole.
- 2.2. Criterion ii of Policy EC4 allows for B1(a) offices, where they are essential to the continued operation of an established B1(a) use i.e. an extension, for example, would be permitted. Existing non-employment uses, that require an ancillary office use are also granted exception, by criterion i. As such, existing properties should not be prejudiced by this policy.