

Stevenage Borough Council Answers to Inspectors Initial Questions

Stevenage Borough Council has prepared answers to the Inspectors Initial Questions. For ease of reference, the Council's answer to each question is set out below the Inspectors question. Document references cited relate to the examination library and examination documents available on the Council's website.

Introduction

1. This note flags up some initial questions I have that would benefit from early clarification. Dealing with these matters now should save time later. In answering these questions can the Council consider whether it might be necessary to advance any potential main modifications to the Local Plan?

Yes, the Council is considering whether any potential main modifications are necessary particularly as a result of ongoing discussions with interested parties. The Council will forward any potential main modifications to the Inspector in due course.

Legal Compliance

2. Has the Plan been prepared in accordance with the Local Development Scheme?

Yes, the plan has been prepared in accordance with the Local Development Scheme (LPD1). This is demonstrated more fully in the Legal Compliance Checklist (SC3).

3. Has the Plan been prepared in general accordance with the Statement of Community Involvement and public consultation requirements?

Yes, the plan has been prepared in general accordance with the Statement of Community Involvement (LPD6) and all prevailing regulatory requirements. Details of the public consultation undertaken are set out in the Regulation 22 Consultation Statement (LP7). This demonstrates more fully how it has complied with the statutory requirements. The Legal Compliance Checklist (SC3) provides further information on how we have met all regulation requirements.

4. Have any significant concerns been expressed by interested parties about the Sustainability Appraisal?

Natural England raised a number of concerns regarding the Sustainability Appraisal (LP2). The Sustainability Appraisal has been amended to address all of the concerns raised (LP3). The concerns raised and how these have been

resolved are set out in the Stevenage Borough Council and Natural England Memorandum of Understanding (ED102). Appendix A is a full schedule of changes made to the Sustainability Appraisal to address the concerns raised by consultees, including Natural England.

5. Have any significant concerns been expressed by interested parties about the Habitat Regulations Assessment?

Natural England raised a number of concerns regarding the Habitat Regulations Assessment. Natural England is content with the conclusion of the HRA but suggest some minor additional wording. This has been added. The concerns raised and how these have been resolved are set out in the Stevenage Borough Council and Natural England Memorandum of Understanding (ED102).

Housing

6. There would appear to be a discrepancy with the housing numbers in the Plan. Specifically, para 4.5 says that 'our strategy sets out how 8,155 homes will be built in and around Stevenage', whereas Policy SP7 commits to providing at least 7,600 homes and this seems to be the number used elsewhere in the Plan. Can you please provide an explanation for this difference?

Paragraph 4.6 refers to 8,155 homes; this is a typographical error. The 8,155 figure relates to the overall number of homes that could be delivered by the plan if all of the allocations and committed supply were to come forward – it includes a small buffer to alleviate the risk of any changes in circumstances beyond our control. This is explained more fully in Housing Technical Paper (TP2 – Section 4). The housing target is 7,600 homes and this is the figure which should have appeared in paragraph 4.6. The Council suggests a minor modification to correct this error and replace the 8,155 figure with the correct 7,600 figure.

7. Policies SP7 and HO7 seek affordable housing as part of all residential development. The Court of Appeal judgement of 11 May 2016 (SS v W Berks DC and Reading BC) concerned national policy on thresholds for planning obligations for affordable housing and tariff style contributions. The effect of the judgement is that the policies in the Written Ministerial Statement of 28 Nov 2014 are once again national policy. The WMS states that affordable housing and tariff style contributions should not be sought for sites of 10 units or less (or 5 in designated rural areas). In this context, is the Council likely to want to amend the Plan?

At the time of writing our Whole Plan Viability Study (T13), the national threshold for planning obligations for affordable housing and developer contributions had been quashed and no longer constituted national policy. As such, this study included the assessment of small sites for their viability,

alongside a range of other site types and sizes. This study concluded that small sites (similar to brownfield sites) within the Borough had the scope to provide up to 25% affordable housing, as well as contributing towards infrastructure.

The Borough has an acute need for affordable homes across the town. Our evidence shows that it is likely many of the town centre sites will not be able to meet the requirements for affordable homes due to viability issues. Smaller sites will therefore provide a critical element of the affordable housing land supply and an exception to national policy is justified.

The Council, therefore, proposes to delete Paragraph 9.57 and to retain the requirement for all schemes to provide affordable housing, unless site specific constraints can be demonstrated through a viability assessment.

8. There also appears to be a discrepancy between the affordable housing targets in Policies SP7 and HO7, with SP7 seeking 40% affordable housing, but policy HO7 applying targets of 25% and 30% (depending on whether the site is previously developed). Can you please explain the rationale for this?

Our current evidence shows we can viably ask for 25% or 30% affordable housing, as set out in Policy HO7. However, the Council has an aspiration to increase this figure, due to the severe shortage of affordable homes currently being experienced. It is also expected that, due to the large-scale regeneration being proposed, the market will pick up relatively quickly and significantly, thus increasing the viability of schemes dramatically. As such, the overall target for affordable homes over the plan period is set out as 40%. This will be met by reviewing the evidence on viability and affordable homes regularly and carrying out an early review of this Local Plan policy, with the aim of raising the HO7 targets, once appropriate and justified. A higher level will also be encouraged for those schemes that are not fully policy compliant, where requirements will be assessed by an up-to-date financial appraisal.

Following consultation responses received, the Borough Council accepts that this explanation is not as clear as it could be within the Plan. As such, modifications are proposed to amend the wording of both HO7 and paragraph 9.53 to provide clarification. Full details of the proposed wording will follow in the schedule of proposed modifications, which should reach the Inspector by Wednesday 24 August.

Objectively Assessed Need (OAN)

9. I note that the Council are updating their SHMA and looking at the latest household projections as well as updating the housing technical paper to take into account new completions and data. Consequently I have not looked in detail at the issue of the Council's OAN figure yet. Can you please advise when this

further work will be ready? It is likely I will have some questions in relation to the important matter of OAN once I have read all of the documents currently being prepared.

The updated technical work will be available as follows:

- Stevenage and North Hertfordshire Strategic Housing Market Assessment Update, Volume 2: Establishing the need for all types of housing – Friday 2 September 2016
- Stevenage and North Herts SHMA: Update of demographic modelling – Friday 2 September 2016
- Housing Technical Paper update – Friday 23 September 2016

Infrastructure and Highway Safety

10. The Council's Infrastructure Delivery Plan (July 2016) (IDP) appears to contain lots of gaps in funding for some of the large essential infrastructure projects the Plan is predicated on. Of particular concern are those projects that are deemed to be essential, but currently have no committed funding. While I note that the IDP says that these schemes are required to support levels of growth set out in the Plan, but the Plan could proceed without certainty of the funding; I have some concerns about this approach given the number of projects that currently do not have committed funding and the important nature of some of these.

Question continues, no answer required.

11. It seems that some of these projects are central to the overarching strategy of the Plan and if they were not delivered the delivery of the Plan would be seriously affected. I would be pleased if you could provide some more information about any critical or essential projects that do not currently have committed funding as well as the impact the failure to deliver the particular project would have on the delivery of the Plan and in particular the delivery of houses and jobs in the early years of the Plan.

The Council commissioned AECOM to prepare an Infrastructure Funding Strategy, September 2015 (TI2). This reviewed the IDP interim update, identified the extent to which funding is already committed to delivering infrastructure, identified developer contributions including CIL, estimated potential funding available for infrastructure and considered the impact that different funding scenarios will have upon Plan delivery. The report finds at para 4.6.1 that:

"All scenarios suggest a deficit in funding over the emerging Local Plan period meaning that the total funding available is lower than the total costs of infrastructure. However, funding available for all scenarios is

sufficient to cover the cost of delivering critical and essential infrastructure items.”

The Council has applied for and will continue to apply for a range of sources of funding to address the remaining funding gap. A recent example is the LEP bid for £50million towards the new station.

12. I note that there are some items in the IDP that are dependent on developer contributions from allocated sites in the Plan. Has the cost of these contributions been considered when undertaking viability assessments? If it is shown when the planning applications are submitted that the development could not afford to pay for the works does the Council have a backup Plan or would it mean the infrastructure and potentially the development could not proceed?

The developer contributions that meet the requirements of CIL Regulations 122 and 123 for the three large sites are incorporated into the viability assessment. The following figures have been used – see 7.26 of Whole Plan Viability Study, including CIL (TI3):

“When considering the strategic sites we have incorporated the best estimate of the site specific s106 costs into the appraisals as set out below. These are the costs that would meet the post April 2015 restrictions on pooling s106 contributions. These sites do not put significant further pressure on the infrastructure and improvements that will be required that will not be sufficiently site specific to pass the tests for payments to be required through s106. These items will be funded through a range of other sources including CIL.

a. Stevenage North £7,180,000

b. Stevenage West £13,950,000

c. Stevenage South East £7,000,000.”

The Council is progressing with the Community Infrastructure Levy and the timetable for adoption is set out in the Local Development Scheme (LPD1). The Council has applied to and will continue to apply to the LEP for funding. A recent example is the LEP bid for £50million towards the new station. In addition, the Council has applied for and will continue to apply for a range of sources of funding to address the remaining funding gap.

13. Also, any updates that the Council can provide in relation to funding would be extremely helpful as I realise that this is something that is evolving.

The Council does not have any further confirmed funding updates at the present time.

14. Highways England have expressed concern about the lack of transport modelling to assess the impact of certain sites allocated in the Plan on the A1(M) and the strategic road network. I note that this being carried out and will be available at the end of August. I look forward to receiving this along with any revised comments from Highways England.

The modelling work referred to is a run of the then Stevenage and Hitchin Urban Model (SHUM) with Stevenage Local Plan growth in January 2015. This was work commissioned through AECOM (Birmingham) by Stevenage Borough Council which also took into account the Local Plan growth (at that time in North Hertfordshire District).

Highways Agency (now Highways England) signed off the original SHUM model as being fit for purpose for Local Plan use.

Since then the key work undertaken has been the development of the Central Stevenage Paramics Model which includes the A1M and models junctions 7 & 8 in detail, also taking into account the Smart Motorway scheme.

The specification for the model development work was shared with Highways England in January 2016. Highways England attended a meeting to discuss the model development and performance in February 2016. A Local Model Validation Report (LMVR) has since been produced (Hertfordshire County Council received an updated version last week). This will be communicated to all partners, the Council and Highways England by the end of the month.

Forecast year versions of the model were also developed covering 2021 and 2031 and results from the initial run of the model were shared in a meeting on 23rd June 2016, to which Highways England were invited. Unfortunately no representative from Highways England attended the meeting. Hertfordshire County Council received an updated Forecast Report on 17.08.2016. This will also be shared with all partners, the Council and Highways England by the end of the month.

In summary, Highways England have been engaged in the development of the Paramics model and this presents a more detailed tool to assess the impact of development on junctions 7 & 8 in particular. Hertfordshire County Council will be providing the following to Highways England:

- January 2016 SHUM testing note
- Central Stevenage Paramics Model LMVR & base modelling files
- Central Stevenage Paramics Forecast Model – report and modelling files.

Sustainability Appraisal (SA)

15. What are the key differences between CD LP2 and LP3?

The differences are set out in Appendix A at the end of this document.

Best and Most Versatile Land (BMV)

16. Paragraph 112 of the National Planning Policy Framework advises that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land and that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Can the Council please direct me to where they have carried out such an assessment?

The Stevenage Borough Local Plan Scoping Report, 2012 (LP4) states that 'the majority of land within Stevenage (more than 75%) is classified as 'Urban' with the vast remainder being classified as Grade 3'. This is further illustrated in Figure 21 of this document, taken from Natural England data, which does not subdivide the Grade 3. However, we were made aware, by Natural England during the publication consultation, that the Grade 3 agricultural land has possible pockets of higher grade land contained therewith. Natural England acknowledged, themselves, the difficulties regarding their classification map not being sufficiently detailed to identify the subdivision of Grade 3 and investigated whether there are more detailed maps available.

Notwithstanding this, due to the tightly bounded nature of the Borough, the Council have limited options in terms of available land for development. All of the land allocated for development is required if we are to meet our objectively assessed needs, and there is no lower grade agricultural land available within the Borough to which we could direct development. Due to their being no alternative sites available within the Borough, it was concluded that there was no merit in a more detailed comparative assessment by reference to agricultural land. To the extent that development within allocated sites might be laid out to minimise the loss of BMV land, that is a matter to be addressed in the context of specific schemes when the implications for development of a variety of constraints will be addressed and weighed in the overall balance. The majority of the land surrounding Stevenage, in neighbouring authorities, is of equal or higher agricultural value, so options outside of the boundary would also lead to the loss of BMV land.

Gypsy and traveller site provision

17. Policy HO12 allocates a site for between 11 and 16 pitches. Is this figure derived from the data in para 5.7 of the DCA Gypsy and Traveller Accommodation Assessment (2013)? If so, can you please show the calculation that was carried out to arrive at the figure in the policy?

The figure is derived from the data in para's 5.6 and 5.7 of the DCA Gypsy and Traveller Accommodation Assessment, 2013 (HP6). The approach taken is outlined in para 5.2 of the Housing Technical Paper (TP2). This states that

"The accommodation study identifies a requirement for three additional pitches over the period to 2018, with a further 3-5 pitches required in each five-year period thereafter."

The calculation is:

| Plan period | Number of pitches | Total number of pitches |
|--|-------------------|-------------------------|
| Net need for new permanent pitches to 2018 | 3 | 3 |
| Following five year period 2019-2023 | 3-5 | 6-8 |
| Following five year period 2024-2029 | 3-5 | 9-13 |
| Remaining two year plan period 2030-2031 | 2-3 | 11-16 |

18. Planning Policy for Traveller Sites says at paragraph 24 that 'local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites... that they should determine applications for sites from any travellers and not just those with local connections'.

Question continues, no answer required.

19. However criterion 'a' of Policy HO13 requires applicants seeking gypsy and traveller accommodation on unallocated sites in the borough to demonstrate a local need for accommodation. As such the policy does not accord with National Planning Policy. In this context, is the Council likely to want to amend the Plan?

The Stevenage Borough Local Plan takes a positive, plan led approach to the provision of Gypsy and Traveller accommodation. As such, it identifies a new Gypsy and Traveller site which is sufficient to meet the entire need arising in the plan period. This is in addition to the existing Gypsy and Traveller site within the Borough at Dyes Lane. This approach is confirmed at paragraph 9.95 of the plan.

Criterion 'a' of Policy HO13 relates to the requirement of paragraph 24 a) Planning Policy for Traveller Sites that;

"Local Planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites: a) the existing level of local provision and need for sites."

Criterion 'a' of Policy HO13 requires planning applications for new sites to consider the existing level of local provision and need for sites and for any

further sites to demonstrate a sequential approach. The reference in criteria 'a' to "*Satisfies a demonstrated local need for accommodation and follows a sequential approach to site identification*" is explained at paragraph 9.96 of the plan. This states that "*Such applications will need to be accompanied by up-to-date evidence of need.*" It then continues to explain the sequential approach.

Criterion 'a' of Policy HO13 therefore requires an application to identify that there is a demonstrated need for the site, in accordance with paragraph 24 a) of Planning Policy for Traveller Sites.

The Council understands the concern of the Inspector that the criterion could be misinterpreted. As currently worded, it needs to be read in conjunction with paragraphs 9.95 and 9.96 of the plan which explain what an applicant is required to demonstrate. If the Inspector considers this goes to an issue of fundamental soundness, the Council suggests the following main modification:

- a. Satisfies a demonstrated ~~local~~ need for accommodation and follows a sequential approach to site identification; ...

20. It would appear that the allocated site suffers from surface water flooding issues. Has this constraint been fully considered and if so where?

The mapping of surface water flood risk at this site is based on a nationally derived dataset and more detailed modelling is not available for this site. The Stevenage Borough Council Level 2 Strategic Flood Risk Assessment (E3a) makes an assessment of the surface water flood risk of the wider site in paragraph 4.3 of the document. The Environment Agency updated Flood Map for Surface Water (uFMfSW) indicates that there is a risk of surface water flooding in the south and west section of the site.

No relevant parties have objected to this allocation on the grounds of surface water flooding. We are in contact with the Environment Agency and Hertfordshire County Council (as Lead Local Flood Authority) to confirm there are no issues that cannot be addressed through appropriate mitigation as required.

There is the opportunity to use a SuDS based system to mitigate any surface water flood risk. Mapping from the BGS suggests that on the eastern portion of the site there is a very significant potential for reduced use of infiltration SuDS, although non infiltration SuDS, such as rainwater harvesting, green roofs, permeable surfaces etc, would be suitable. Conversely, on the west of the site, the use of infiltration SuDS is likely to be feasible. This would be quantified through an infiltration/soakaway test.

The Council would require that, as part of any planning application for the site, a detailed drainage assessment based on the site specific conditions would be submitted and approved prior to development of the site.

Conclusion

21. An early response to the above queries would be appreciated. I am keen that the above matters are resolved, in so far as they can be, promptly in order to ensure that the examination is not unduly delayed. Specifically, I will have to reach a view as to whether an exploratory or pre-hearing meeting is required. I therefore request a response by close of play on 22 August 2016.

22. If you have any queries regarding the above then I can be contacted via the Programme Office. A copy of this note and the Council's response should be placed on the examination website.

*Louise Crosby
Planning Inspector*

Stevenage Borough Council trusts this information is useful. Please do not hesitate to contact me if you require any further information or clarification.

*Richard Javes
Planning & Transport Policy Manager*

Appendices

Appendix A: Question 4 and 15 Sustainability Appraisal key differences between LP2 and LP3

Appendix A

Amendments made to the SA in light of consultee responses

The LP2 [Sustainability Appraisal](#), published in 01/2016, as part of the SBLP Publication Consultation was amended slightly to reflect the small number of responses that we received back from individuals and organisations. These differences are contained in LP3 [SBLP Sustainability Appraisal](#), published in 7/2016.

The changes below are expressed in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text.

| Original Page Number | New Page Number | New Policy / Para | Proposed Change | Reason for Proposed Change |
|----------------------|-----------------|-------------------|--|---|
| 5 | 8 | 1.7 – 1.28 | Insertion of paragraphs 1.7 – 1.28 providing an explanation of the combination of assessment documents. | To tie together the assessment documents – SA, EqIA and HRA |
| 12 | 15 | 1.51 | Addition of wording... Reasonable alternative approaches have been considered in developing the draft Local Plan . <u>SBLP using the following criteria:</u> <ul style="list-style-type: none">• <u>Exclusionary criteria – e.g. flood risk areas and areas outside the pattern of development set out in the strategy.</u>• <u>Discretionary criteria – e.g. relating to public rights of way, local nature conservation designations etc. which might not lead to the exclusion of a site but would be important from a</u> | Clarification of the term 'reasonable alternatives' |

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| | | | <p><u>sustainability perspective and should influence the decision as to whether or not a site is taken forward (and, if it is, the conditions that might be attached to any development).</u></p> <ul style="list-style-type: none"> • <u>Deliverability criteria – e.g. land ownership, access, planning history, viability, size etc. all of which may have a bearing on whether or not the site is deliverable as a location for development.</u> | |
| 55 | 59 | 9.22 | <p>Addition of wording...</p> <p><u>Borough housing targets were revised following further work and these are detailed on page 70.</u></p> | Clarification of why borough housing targets vary between original and revised numbers. |
| 58 | 62 | 9.36 | <p>It is recognised that option <u>B C</u> was the most appropriate option. However, it is noted that many of the effects of these options must be classed as unknown until such point that a specific site has been identified. <u>Our evidence suggested that extensions to current stores would not be sufficient to cater for the growth within the Borough. However, this option is flexible and dependent on the growth of the town. It is likely that such a store would not be required until towards the end of the SBLP period.</u></p> | SA originally stated B was our preferred option. This was a mis-type. Additional clarification provided for when the new store is expected within the Plan period. |
| 63 | 67 | 9.57 | <p>Addition of wording...</p> <p>Option A performed well in terms of environmental sustainability. It is recognised that the containment of expansion within the existing site will reduce the pressure for development. This option would assist in the long term protection of habitats and reduce flood risk from surface water run-off. However, this option will limit the long term development of the hospital <u>and impact socio-economic needs.</u></p> | |

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| 63 | 67 | 9.58 | <p>Addition of wording...</p> <p>Option B performed much better in socio-economic terms, and less well in environmental terms. Providing the hospital with the option of expansion would ensure the future success of the site in its sub-regional role. As the town's largest employer it is important to recognise the economic value a site such as this brings to the town. <u>We chose option B as</u> this option provided flexibility and greater opportunities for long term development needs.</p> | |
| 64 | 68 | 9.70 | <p>Addition of wording...</p> <p><u>The development of a New Town was not included as an option as it could not be delivered within the timeframe of the SBLP and would not be consistent with the objective of providing for the identified need within the Borough boundary in the interests of securing delivery.</u></p> | Clarification provided for why a New Town is not considered as part of this SBLP. |
| 66 | 70 | Issue 1 – Revised Borough housing target options | <p>Addition of wording in option B of the table...</p> <p>Borough-wide capacity</p> | Addresses the absence of clarity in relation to Issue 9 (and Issue 1 of the revised housing number targets) not being clear. |
| 66 | 70 | 9.80 | <p>Addition of wording...</p> <p><u>The numbers differ to those quoted in 'Issue 9 - Borough housing targets' due to new population projections which were published and also an increase in densities identified on</u></p> | Provides clarification of the different population numbers quoted in Issue 9 and Issue 1 (revised |

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| | | | <u>potential development sites, including the Town Centre regeneration plan which provides a significant number of new dwellings to meet the housing need in Stevenage.</u> | housing number targets) |
| 66 | 71 | 9.83 | Addition of wording... <u>Option A performed well in terms of biodiversity but failed to meet local housing needs. Option B provided more homes overall. It could meet local needs and sites could be identified in the Borough boundary that could accommodate the growth. It supported and grew the local economy by providing greater levels of housing for the population.</u> | Provides clarification of why option B was chosen. |
| 67 | 72 | 9.89 | Addition of wording... <u>Of the three options presented, option C provided the most appropriate option both in terms of meeting the requirements of the NPPF but also in terms of sustainability. The long term approach to a potential Green Belt release would enable a more strategic approach to land allocations.</u> | Provides clarification for why option C was chosen. |
| 84 | 88 | Table 17 | Amendment of title to read 'Summary Appraisal of the <u>Strategic Detailed Policies</u> | Mis-type. |
| 92 – 94 | 96 - 98 | 10.59 – 10.76 | Amendments to refer to correct Policy reference numbers. 10.59 RTC1 <u>TC2</u> 10.61 RTC2 <u>TC3</u> 10.62 RTC3 <u>TC4</u> 10.63 RTC1—RTC5 <u>TC2 – TC7</u> 10.65 RTC4 <u>TC5</u> 10.67 RTC5 <u>TC6</u> | Mis-type. |

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| | | | 10.69 RTC6 <u>TC7</u> 10.71 TC1 <u>TC8</u> 10.73 ROT1 <u>TC9</u> 10.75 RCV1 <u>TC11</u> 10.76 RCM1 <u>TC12</u> | |
| 96 | 100 | 10.91 | Addition of wording... <u>HO2 is adjacent, although not immediately, to Knebworth Woods SSSI and is on grade 3 agricultural land. Stevenage is tightly constrained by its Borough boundary and no other lower grade agricultural land, or land of a lesser environmental quality can be identified for development within the boundary of the Borough. Any increased recreational pressures on Knebworth Woods SSSI will be addressed through the master planning of HO2 and will ensure an adequate buffer is provided between the development and the SSSI designation.</u> | Provides clarification on the impact of HO2 on Knebworth Woods SSSI and why we are building on BMV land in the Borough. |
| 96 | 100 | 10.94 | Addition of wording... <u>HO3 is on grade 3 agricultural land. Stevenage is tightly constrained by its Borough boundary and no other lower grade agricultural land, or land of a lesser environmental quality can be identified for development within the boundary of the Borough.</u> | Provides clarification on why we are building on BMV land in the Borough. |
| 96 | 100 | 10.98 | Addition of wording... <u>HO4 is on grade 3 agricultural land. Stevenage is tightly constrained by its Borough boundary and no other lower grade agricultural land, or land of a lesser environmental quality can be identified for development within the boundary of the</u> | Provides clarification on why we are building on BMV land in the Borough. |

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| | | | <u>Borough.</u> | |
| 101 | 105 | 10.136 | <p>Addition of wording...</p> <p>This policy will contribute positively to the SA framework. The policy works to protect the loss of Principal Open Space designated areas in the Borough, ensuring access for all and promoting health and wellbeing within the town. <u>The policy provides the opportunity for developments adjacent to Principal Open Spaces to provide additional habitat.</u></p> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 101 | 105 | 10.137 | <p>Addition of wording...</p> <p>The policy identifies the wildlife sites within the boundary of the town. It goes on to make provision for their protection and enhancement through development and redevelopment in Stevenage. <u>The policy provides the opportunity for developments adjacent to Wildlife Sites to provide additional habitat.</u></p> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 101 | 105 | 10.138 | <p>Addition of wording...</p> <p>The appraisal of this policy gives positive environmental and social effects. It recognises the value that these corridors add to the biodiversity of the Borough as well as providing thoroughfares for access and wellbeing of the residents of the town. <u>The policy provides the opportunity for developments adjacent to Green Corridors to provide additional habitat.</u></p> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 120 onwards | 124 onwards | All Assessment Matrix | Matrix tables have been coloured RAG in order to make it clearer for the reader to assess the impact of policy. | |

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| | | tables | | |
| 286 | 290 | Policy SP5 | <p>Addition of wording to objective 1...</p> <p>Infrastructure proposals will involve use of greenfield land. This loss will be permanent and long term. Secondary impacts from use of new roads by vehicles that may disturb habitats or species including designated Wildlife sites adjacent to the A1(M). <u>Highways England have their own biodiversity plan document (Our plan to protect and increase biodiversity (Highways England)) which will assess the impact and appropriate mitigation measures required for the A1(M).</u></p> | Clarifies the need for HE to undertake assessment and mitigation for the A1(M) SMART motorway proposal. |
| 313 | 317 | Policy EC1 | <p>Addition of wording to objective 1...</p> <p>Loss of some greenfield on allocated sites will result in short term negative impacts, however, these can be mitigated against through the provision of new habitats that will establish over time. <u>Opportunity for development adjacent to Wildlife Site NH2/16 to provide additional habitat.</u></p> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 315 | 319 | Policy EC2 | <p>Addition of wording to objective 1...</p> <p><u>Opportunity for developments adjacent to Green Corridors to provide additional habitat.</u></p> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 323 | 327 | Policy EC6 | <p>Addition of wording to objective 1...</p> <p><u>Opportunity for developments adjacent to Principal Open Spaces, Wildlife Sites and Green Corridors to provide additional habitat.</u></p> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |

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| 337 | 341 | Policy TC7 | Addition of wording to objective 1... <u>Opportunity for development adjacent to Principal Open Space NH1/2 to provide additional habitat</u> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 367 | 371 | Policy HO1 | Addition of wording to objective 1... Loss of greenfield and, in some circumstances Green Belt, is a permanent and long term loss. <u>Opportunity for developments adjacent to Principal Open Spaces, Wildlife Sites and Green Corridors to provide additional habitat eg HO1/1, HO1/2, HO1/6, HO1/7 and HO1/15.</u> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 369 | 373 | Policy HO2 | Addition of wording to objective 1... Policy involves the permanent and long term loss of Green Belt. <u>Opportunity for development adjacent to Wildlife Sites and Green Corridors to provide additional habitat.</u> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 395 | 399 | Policy HC1 | Addition of wording to objective 1... <u>Opportunity for developments adjacent to Principal Open Spaces, Wildlife Sites and Green Corridors to provide additional habitat.</u> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |
| 399 | 403 | Policy HC3 | Addition of wording to objective 1... <u>Opportunity for development adjacent to Wildlife Site NH2/35 to provide additional habitat.</u> | Identifies the positive contributions that can be made towards locally designated sites that are important for biodiversity. |