

**Stevenage Borough Local Plan  
Duty to Co-operate Statement**

**July 2016**



## **1. Introduction**

- 1.1 The Duty to Co-operate was established by the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004.
- 1.2 It places a legal duty on local planning authorities, county councils and public bodies to work together actively and constructively, on an ongoing basis, to maximise the effectiveness of Local Plan preparation. These bodies are prescribed in the Town & Country Planning (Local Planning) (England) Regulations 2012 and those relevant to Stevenage are set out in Appendix 1.
- 1.3 National guidance makes clear that the Duty to Co-operate is not a duty to agree, but that the objective should be to secure the necessary co-operation on strategic issues, before plans are submitted for examination.
- 1.4 The Duty to Co-operate relates to matters that have a significant impact on two or more local planning areas, including infrastructure.
- 1.5 This statement reviews the Duty to Co-operate actions taken by SBC in producing the Stevenage Borough Local Plan (SBLP).
- 1.6 The SBLP, read as a whole, is the product of the continuous and ongoing discharge of the Duty to Co-operate with many bodies and organisations.
- 1.7 The Borough Council (SBC) has held extensive Duty to Co-operate discussions in order to investigate strategic priorities to deliver:
  - New homes and jobs
  - Retail, leisure and other commercial development
  - Infrastructure provision
  - Climate change mitigation and adaption
  - Conservation and enhancement of the natural and historic environment
- 1.8 In addition, a strategic approach to Green Belt boundaries has been taken.

## **2. Context**

- 2.1 Stevenage is located within the county of Hertfordshire, around 30 miles north of London.
- 2.2 Within 25 miles of the Borough are the northern boroughs of London, the whole of Hertfordshire, and parts of Bedfordshire, Buckinghamshire, Cambridgeshire and Essex. The map on p12 of the SBLP shows Stevenage in this strategic context.
- 2.3 Stevenage is a small town and Borough, completely surrounded by North Hertfordshire (NHDC) and East Hertfordshire (EHDC). This means that the decisions we make, and those that our neighbours make, are particularly closely related. Any development proposed by NHDC or EHDC on the edge of Stevenage will provide benefits to the town; providing homes for people that want to work and spend time (and money) in Stevenage and supporting investment in the town. However it will also lead to increased pressures on facilities and infrastructure within the Borough.

- 2.4 Although we cannot make plans for land outside of the Borough boundary, the close relationships are crucial to ensuring a consistent and strategic approach is taken.
- 2.5 Stevenage faces a number of issues, many of which require a strategic approach, including:
- The Borough is mainly urban, and is 'underbounded', meaning there is a lack of available land for development to meet all of its needs
  - The Borough is surrounded by Green Belt
  - Employment land is being lost to residential development
  - There is a huge shortage of affordable homes
  - The town centre badly needs investment
  - Infrastructure requires improvement, particularly the A1(M).

### **3. Background**

- 3.1 In September 2004, the Borough Council began work on preparing a series of Development Plan Documents for Stevenage, including a Core Strategy and four Area Action Plans, to guide development to 2021 and supersede the Stevenage District Plan Second Review (SDP2R).
- 3.2 This included a joint Area Action Plan for Stevenage and North Herts, known as the Stevenage and North Herts Action Plan (SNAP), in which urban extensions were being planned for, to the north and west of the town, to meet a large proportion of the Borough Council's and NHDC's housing target, amongst other things. This reached the issues and options stage.
- 3.3 Following extensive work, the draft Core Strategy was submitted for examination in late May 2010, two days before the Secretary of State announced the revocation of the Regional Spatial Strategy (RSS) for this area, the East of England Plan. At this point, NHDC decided that they would no longer work with the Borough Council to deliver new homes within the SNAP area.
- 3.4 The Inspector for the Core Strategy decided that the Strategy was in conformity with the RSS (a statutory requirement), but unsound because NHDC refused to co-operate with the planning and delivery of cross-boundary urban extensions to the north and west of the town as required by the RSS.
- 3.5 The High Court upheld the decision of the Core Strategy Examination Inspector to insist upon our withdrawing the Core Strategy. The Court stated that it recognised that it was impossible for the Borough Council to prepare a Core Strategy that was both in conformity with the RSS and that was deliverable. Nonetheless, SBC was compelled to withdraw the Core Strategy, which was done from 1 February 2012.
- 3.6 Two Area Action Plans were adopted as material considerations in the determination of planning applications at this time, as was an Interim Planning Policy Statement that was designed to 'plug' the policy holes anticipated to be left by the revocation of the RSS.

- 3.7 The effect of the decision of the High Court was that the Borough Council had no choice but to wait for the Government's formal revocation of the RSS before undertaking any public consultation on a replacement local plan.

## 4. Summaries of strategic planning priorities

- 4.1 This section contains summaries, by Local Plan issue, of how SBC has discharged the Duty to Co-operate. Relevant evidence relating to the actions identified is provided in Appendix 2.

1. HOUSING
Strategic issue
<ul style="list-style-type: none"> <li>• Housing needs should be calculated based on Housing Market Areas – these often cover more than one local authority area.</li> <li>• Need to determine whether objectively assessed housing needs (OAN) can be met within the boundary, and if not, how they will be met elsewhere.</li> <li>• Need to determine whether all OAN can be met within the HMA (i.e. whether Stevenage is required to meet any further needs not provided by others).</li> <li>• Housing sites on the boundary could impact upon neighbouring authorities (and their Local Plan's).</li> <li>• The impact of plans for housing in other authority areas</li> </ul>
Key evidence base
<ul style="list-style-type: none"> <li>• Housing Technical Paper, 2015</li> <li>• Stevenage and North Herts Strategic Housing Market, 2015 (SHMA, 2015)</li> <li>• Housing Market Areas Study in Bedfordshire and Surrounding Areas, 2015 (HMA)</li> <li>• Strategic Land Availability Assessment: Housing, 2015 (SLAA)</li> <li>• Heritage Impact Assessment: Marymead, Broadwater, 2015</li> <li>• Heritage Impact Assessment: Town centre, 2015</li> <li>• Heritage Impact Assessment: North Stevenage, 2015</li> <li>• Heritage Impact Assessment: Shephall Green, 2015</li> </ul>
Strategic Partners
<ul style="list-style-type: none"> <li>• North Hertfordshire District Council</li> <li>• East Hertfordshire District Council</li> </ul>

- Welwyn Hatfield Borough Council
- Central Bedfordshire District Council
- Luton Borough Council
- Bedford Borough Council
- Milton Keynes Council
- Aylesbury Vale District Council
- Highways Authority
- Hertfordshire LEP
- Hertfordshire County Council
- Herts Chamber of Commerce
- Historic England
- London Luton Airport
- Members of the London Luton Airport Consultative Committee (LLACC)

## Key Actions

**Action 1:** Targeted early stage consultation carried out by letter.

**Partners:** Over 70 local authorities and relevant organisations

**Outcome:** The consultation asked for opinions on a range of local plan matters related to Stevenage. One of the key aims was to establish whether any other Local Planning Authorities (LPAs) might be willing to accommodate any development needs which we might not be able to provide in Stevenage.

**Date:**

- Consultation carried out – Dec 2012 to Jan 2013

**Action 2:** Letter sent to those authorities considered (at the time) to share the strongest HMA links with Stevenage, to request assistance in meeting development needs.

**Partners:** NHDC, EHDC and Central Beds.

**Outcome:** No offers to meet housing needs were received.

**Date:**

- Letter sent – April 2014

**Action 3:** Joint HMA study produced and workshop held.

**Partners:** Commissioned by a partnership of seven councils:

- Central Beds
- Bedford BC
- LBC
- Milton Keynes Council

- NHDC
- SBC
- Aylesbury Vale DC.

The following neighbouring area stakeholders were invited to attend the workshop and consulted throughout the process: Cambridgeshire & Peterborough Joint Strategic Planning Unit, DBC, EHDC, East Northants Council, Hertsmere BC, Huntingdonshire DC, North Northants Joint Planning Unit, South Cambs DC, Three Rivers DC, Uttlesford DC, WBC, Wellingborough BC, WHBC).

The stakeholder workshop was attended by EHDC and WHBC.

**Outcome:** Identified Housing Market Areas for the partnership and surrounding areas. Emerging HMA outputs were also discussed with officers and members of neighbouring local authorities under the Duty to Co-operate.

**Dates:**

- HMA published – Dec 2015
- Consultation closed – 4 Dec 2015
- Consultation draft circulated – 11 Nov 2015
- Stakeholder workshop – 16 June 2015
- Stakeholder consultation on methodology – feedback required by 1 June 2015

**Action 4:** Joint SHMA update produced.

**Partners:** Commissioned by SBC and NHDC.

Representatives from neighbouring authorities were invited to join the Steering Group for the project, including: Central Beds, DBC, EHDC, LBC, South Cambs, SACDC, Uttlesford DC, WHBC.

**Outcome:** Calculated the housing OAN for both areas. Emerging outputs were shared and discussed with the Steering Group as part of this process.

**Date:** SHMA published – June 2015

**Action 5:** Regular meetings held with neighbouring authorities at both officer and member level.

**Partners:** NHDC and EHDC

**Outcome:** Discussions covered a number of housing-related issues including: HMA's, housing targets being (likely to be) progressed by each local authority area, sites likely to impact on other authority areas.

**Date:**

- Various

**Action 6:** Housing sites sent to Highways Authority for informal consultation

**Partners:** Highways Authority

**Outcome:** The Highways Authority provided advice on what might be required for each site. The response did not identify any 'showstoppers' in terms of the sites identified for development.

**Date:**

- Response received – 13 Oct 2015
- Consultation sent by email - 15 Sept 2015

**Action 7:** Meeting with Historic England to discuss the Local Plan in general, including housing sites within or affecting historic assets.

**Partners:** Historic England

**Outcome:** In relation to housing allocations – Historic England recommended further work was carried out to assess the potential impacts of sites within or affecting heritage assets, in line with their newly published guidance. General guidance is discussed under Issue 10: The Historic Environment.

**Date:**

- Heritage Impact Assessments sent to Historic England for comment – 17 Nov 2015
- Heritage Impact Assessments produced – Nov 2015
- Meeting held – 2 Sept 2015

**Action 8:** Regular meetings with London Luton Airport Consultative Committee (LLACC) attended by SBC

**Partners:** London Luton Airport, LLACC

**Outcome:** SBC is involved in preparing joint responses to London Luton Airport consultations. Policies within the Local Plan consider the impacts of the airport and the flight path over the Borough.

**Date:**

- Meetings held quarterly

### **Outcomes from strategic working**

#### **Early stage consultation**

- Of the thirteen LPAs that responded, only three (Epping Forest, LBC and NHDC) said they were willing, in principle, to work with us to meet our development needs.

- Given NHDC's long-standing and strong opposition to making any development provision for Stevenage, and the lack of a published preferred options plan, there was a reluctance to place any reliance on NHDC. Subsequent discussions with Epping Forest and Luton identified that they would not have the physical capacity to accommodate any unmet needs of SBC. Therefore, further work was considered necessary.

### **Letter to HMA authorities**

- Following the release of new housing and population projections, and the realisation that the housing target for the Borough was likely to increase further, a letter was sent to those authorities considered (at the time) to share the strongest HMA links with Stevenage, to request assistance in meeting these needs. No offers to meet needs were received from NHDC, EHDC or Central Beds.

### **HMA Study**

- Joint HMA study provides a consistent, up-to-date, strategic evidence base. HMA's identified and agreed by all partners involved in commissioning the study.
- Evidence shows that Stevenage is located within a single functional HMA, stretching from Welwyn Garden City in the south to Sandy in the north and broadly following the A1(M) / A1 corridor. It ranges from the edges of Luton in the west to Royston in the east. The HMA covers the significant majority of North Hertfordshire's administrative area and smaller parts of Welwyn Hatfield, Central Beds and East Herts.
- The study identifies the 'best fit' HMA (based on local authority boundaries, in accordance with PAS guidance) as being Stevenage and North Hertfordshire, thus confirming this HMA as the most appropriate framework for determining and meeting housing needs.
- The study takes into account the existing HMA studies and the previously defined HMA's of other authorities, which allows for a strategic approach across an area much wider than that covered by the commissioning bodies.
- Feedback from all stakeholders was proactively reviewed and discussed with officers from the commissioning partnership, and the study revised, where appropriate. The consultation response (on the draft study) from DBC, on behalf of the local planning authorities in their SHMA partnership (DBC, Hertsmere BC, Three Rivers DC and Watford Borough Council) supports the approach and the 'best fit' HMA areas, which accord with their study.
- Although the 2014 Welwyn Hatfield SHMA identified Welwyn Hatfield Borough as a separate HMA, Welwyn Hatfield have since expressed concern that they are not included within any neighbouring authorities' HMA's. The study recognises the complexities of the HMA's and although 'best fit' areas have been used for the purposes of calculating OAN, WHBC does partially fall within the same HMA as Stevenage and Duty to Co-operate discussions have been held in relation to this, and will continue to be held to ensure the needs of the



HMA are met. The SBLP demonstrates that housing needs can be met within the Borough boundary. WHBC are yet to determine whether their full OAN can be met within the Borough, however, due to the urban and under-bounded nature of Stevenage, SBC is in the position where all potential suitable, available and achievable development sites (including Green Belt land) have been considered and no further housing can be accommodated within the Borough boundary.

### **Joint SHMA**

- Joint SHMA provides a consistent, up-to-date, strategic evidence base for planning housing across both areas.
- This determines the OAN for both areas, thus directly influencing the housing target in the plan (Policy SP7).

### **Meetings with NHDC/EHDC – housing need**

- NHDC and EHDC both at an earlier stage in plan development than SBC. Housing targets are yet to be defined, but draft figures available.
- Regular meetings (both officer and Member level) ensure timetables and results of evidence studies are shared, and issues are frequently discussed. This helps to ensure a strategic approach is taken in both plans and that any political differences are discussed and resolved, where possible.
- When it became clear that SBC's housing needs could not be met without Green Belt release, Duty to Co-operate discussions around this issue were held. Authorities were asked if sites being considered around the edge of the town had potential to meet any of SBC's housing needs. Both NHDC and EHDC stated that the sites were likely to be required to meet their own needs.
- This led to further work being carried out by SBC, to determine whether densities could be pushed up on identified sites to increase capacity within the Borough. Following discussions with many town centre landowners – asking them to plan for larger-scale schemes, and the new emphasis on regenerating the town centre (as part of the Town Centre Framework and Stevenage First work – supported by the LEP), assumptions around town centre supply were changed and projected housing numbers in the town centre were increased, allowing us to identify sufficient capacity to meet our needs within the Borough (Strategic Policies SP7 and SP4).
- As such, no reliance is placed on other local authorities to meet Stevenage's needs.

### **Site allocations**

- Large housing allocations to the north and west (Policies HO2 & HO3) frequently discussed with NHDC. These have the potential to unlock development within North Herts, likely to be relied upon to meet their housing needs. It was agreed that both Plans should contain policies to ensure cross-boundary objectives and master planning are considered. Policy IT2 also allocates a site to provide access into the NHDC part of Stevenage West.

- Potential EHDC housing site to the east of Stevenage frequently discussed. SBC attended meetings and workshops with the developers, alongside EHDC, and other stakeholders. SBC involvement has been crucial, as the site will be closer to Stevenage than any other town, and will adjoin the urban area. Draft policy requirements shared i.e. affordable housing targets, education requirements, housing mix etc. in advance of plan publication, to ensure the developers had the most up-to-date information. SBC explored with EHDC whether this site had potential to meet any of Stevenage's OAN. EHDC confirmed the site was to meet their own needs.
- The LEP have been actively involved in the promotion of new homes within an extended town centre (Stevenage Central). Their Strategic Economic Plan (SEP) places a big emphasis on the A1(M) growth area and the regeneration of Stevenage town centre to provide homes and jobs to boost the Hertfordshire economy. The Stevenage First board, a partnership including SBC, the LEP, HCC and Herts Chamber of Commerce, was set up to create the Stevenage Central Framework and deliver the regeneration of the town centre. This has actively led to the allocation of 3,000 homes in the town centre under Policy HO1.

#### **Feedback from Highways Authority**

- No showstoppers identified in terms of the housing sites sent to the Highways Authority for review (prior to Publication consultation). Key transport infrastructure issues and likely requirements were identified and officers were advised where further work was required. Although formal transport modelling has, and continues to be, undertaken, this provided an informal earlier-stage consultation and was helpful in determining whether sites selected were appropriate.
- Further modelling work is currently being undertaken by the Highways Authority. This will be covered in the Infrastructure section of this statement (Issue 6).

#### **Sites within or affecting heritage assets**

- Following representations made on previous versions of the Local Plan and an invitation from Historic England to discuss the Plan in more detail, a meeting was held. Local Plan draft policies were discussed and, in particular, potential site allocations within or affecting heritage assets.
- Historic England advised Heritage Impact Assessments (HIA's) should be carried out for all sites likely to have an impact on heritage assets.
- HIA's were subsequently produced for North Stevenage (HO3), the town centre (primarily TC2, TC5, TC7), Marymead neighbourhood centre (HO1/12) and Shephall Centre and adj. amenity land (HO1/14). These were sent to Historic England for approval of the methodology used, and for the key conclusions to be agreed. No response was received from Historic England.
- The HIA for North Stevenage (HO3) identified a part of the site put to us by the developers that would not be suitable for development, as such, the site area

was reduced to take this into account.

- Historic England have since confirmed that the methodology used accords with their best practice guidance and the assessments were good examples of how to carry out this work. Their response to the Publication version of the SBLP confirmed that they accept the findings of three of the assessments, but, they object to the part of the North Stevenage site that falls within the conservation area. They believe its impact will be significant (but not substantial). Our assessment shows there will be a negative impact on the conservation area, but that meeting our housing needs, outweighs the harm.
- A tri-partite meeting was held between SBC, Historic England and the developers of the North Stevenage site. No consensus was reached, but it did allow for a better understanding of the issues from all sides.

### **Consideration of London Luton Airport**

- SBC attends regular meetings with the London Luton Airport Consultative Committee (LLACC). This ensures we stay up-to-date with any development proposals and issues relating to the airport, and also allows SBC to be involved in any joint responses made to the airport on behalf of the effected local authorities and organisations.
- A strategic approach is often taken to responses to consultations, with joint responses being made from LLACC as a whole, and SBC also discussing these issues and sometimes providing joint responses with other Herts local authority members, including HCC.
- Policies within the SBLP consider the effect of the flight path over the Borough. Policy HO2 requires the impacts of noise pollution from London Luton Airport to be mitigated. The supporting text to Policies TC2 to TC7 recognises that building heights need to take the airport into account and requires developers to consult with the LLACC at the earliest opportunity.

### **Ongoing co-operation**

- Duty to Co-operate discussions will continue to be held, with neighbouring authorities and those within the HMA particularly, in relation to ensuring housing needs are met across the HMA.
- MoU's are currently being drafted with EHDC, NHDC and WHBC. These will set out issues which have agreement and those where the authorities cannot agree. It is hoped that an MoU for each authority will be agreed and signed before the start of the examination process.
- Joint working will be key to ensuring successful schemes at North and West Stevenage. It is envisaged that joint meetings/workshops will be held at the master planning stage.
- The SBC West of Stevenage allocation (HO2) is wholly within the Borough boundary. As such an application will come to, and be determined by, SBC alone. However, if NHDC choose to extend the west of Stevenage development into their authority area, a cross boundary application is likely to

be required, as the site is likely to require an access route using land within Stevenage Borough (allocated for this purpose in the SBLP – under Policy IT2), as such, co-operation will be essential in determining this application.

- Duty to Co-operate activities are reported on in the AMR.

## 2. GYPSY AND TRAVELLER (G&T) PROVISION

### Strategic issue

- Joint studies can enable a strategic approach to G&T provision.
- Any unmet needs should be accommodated within the local area.

### Key evidence base

- Gypsy and Traveller site search, 2014
- Gypsy and Traveller Accommodation Study, 2013
- Northern and Eastern Hertfordshire: Gypsy and Traveller Accommodation Assessment, 2006

### Strategic Partners

- Hertfordshire County Council
- North Hertfordshire District Council
- Welwyn Hatfield Borough Council
- East Hertfordshire District Council
- Broxbourne Borough Council

### Key Actions

**Action 1:** Joint evidence study produced to assess future G&T needs across the study area.

**Partners:** NHDC, Broxbourne BC, EHDC, WHBC and HCC.

**Outcome:** A Gypsy and Traveller Accommodation Assessment was published, followed by a Stage 2 report that identified potential sites to accommodate this need.

**Date:**

- Stage 2: site search – published October 2008
- Accommodation Assessment – published June 2006

**Action 2:** Letter sent to HCA (as landowner) asking whether their sites could be made available for G&T provision

**Partners:** HCA

**Outcome:** Response from HCA offering in principle agreement to making their sites available for G&T provision, subject to further discussions being held with SBC around this issue.

**Date:**

- Response received – 11 Dec 2014
- Letter sent – 21 Nov 2014

**Action 3:** Letters sent to neighbouring authorities asking for help in meeting identified shortfall in G&T provision

**Partners:** NHDC, WHBC, EHDC, Central Beds.

**Outcome:** NHDC, EHDC and Central Beds. responded to say they are unable to help meet any of Stevenage's unmet needs at this time. No response recorded from WHBC.

**Date:**

- Responses received – July 2015
- Letters sent – 30 June 2015

**Action 4:** EHDC formally asked if their site on the edge of Stevenage has the potential to accommodate G&T needs for SBC.

**Partners:** EHDC

**Outcome:** Email sent to EHDC, following a meeting held about G&T provision. EHDC did not provide a formal reply. This was discussed further in subsequent Duty to Co-operate meetings. EHDC stated that the site would be required to meet their own Travelling show people needs and that G&T provision should not be provided on these sites.

**Date:**

- Email sent to EHDC – 27 Aug 2015
- G&T Meeting held – 13 Aug 2015

### **Outcomes from strategic working**

#### **Evidence base**

- SBC took part in a joint Gypsy and Traveller Accommodation Assessment. This provided a strategic approach to assessing G&T requirements for the future. This was followed by a report in 2007 which looked at potential areas within these five districts that may be suitable for G&T pitches. This joint work

informed future studies, which fed directly into the Plan as key pieces of evidence.

- SBC commissioned an update to this study in 2013. This study reviews the findings of the 2006 assessment using up-to-date data. SBC consultants worked with HCC and SBC staff in housing and planning, and Health and Education relating to the G&T community in producing this work. This provides the evidence to inform the Local Plan target for G&T provision (Policy SP7).
- The site search identified two potential sites that met the broad tests of suitability and availability for G&T use. However, it also recognised that both sites had been promoted for alternative land-uses through the plan process.

### **HCA liaison**

- A letter was sent to the HCA, along with other landowners across the town, to determine whether they would consider the use of their sites for G&T purposes.
- A positive response was received from the HCA, offering an in principle agreement to making their sites available for G&T provision.

### **Letters sent to neighbouring authorities**

- Bearing in mind both sites identified by the site search had also been identified for other uses, nearby authorities were contacted under the Duty to Co-operate to ascertain whether they had sites or areas which might be able to contribute towards the unmet needs from Stevenage if these sites were to be used for their alternate requirement. No additional sites beyond the Borough boundary were put forward as a result of this exercise.

### **Provision within EHDC (site East of Gresley Way)**

- Discussions were held via Duty to Co-operate meetings, around a potential site allocation within EHDC, on the edge of Stevenage (east of Gresley Way). EHDC discussed this site's potential for meeting their Travelling show people needs, if it were to come forward.
- SBC formally wrote to EHDC asking if this site also had the potential to meet SBC's G&T requirements.
- EHDC stated a number of reasons why they were not keen on this proposal:
  - Travelling show people and G&T's should not be located together;
  - EHDC are looking for a site for private provision, not public provision;
  - EHDC needs may not go down (as expected in their new needs assessment) and they may need to provide any newly identified G&T provision on this site as well;
  - Sites should not accommodate over 15 plots.
- Consequently, EHDC did not offer to meet Stevenage's unmet needs for G&T provision.

- The lack of alternative sites being put forward outside of the Borough boundary informed SBC's decision to look at a suitable alternative site within the Green Belt, previously discounted in the site search for that reason. This site has been taken forward and has been allocated under Policy HO12.

#### **Consultation response from NHDC**

- In NHDC's response to the Publication version of the SBLP they objected to the G&T site proposed on the grounds that its impact in terms of flood risk and transport had not been adequately assessed. However, they also requested that SBC/NHDC work together to explore the potential this site has to meet NHDC G&T demands.
- The Borough Council have carried out additional work to alleviate flood risk concerns raised by NHDC around the G&T site, and further transport modelling is currently being undertaken by HCC.
- A resolution has yet to be reached with NHDC, who still maintain their objections.

#### **Ongoing co-operation**

- SBC will continue to work with neighbouring authorities on this issue, and in particular the management of G&T provision on identified sites, as this has been an issue authorities across Hertfordshire have been discussing, as many bodies are reluctant to take on the management of new sites.

### **3. EMPLOYMENT**

#### **Strategic issue**

- Employment needs should be calculated based on Functional Economic Market Areas – these often cover more than one local authority area.
- Need to determine whether objectively assessed employment needs (OAN) can be met within the boundary, and if not, how they will be met elsewhere.
- Need to determine whether all OAN can be met within the FEMA (i.e. whether Stevenage is required to meet any further needs not provided by others).
- Employment sites on the boundary have the potential to impact upon neighbouring authorities (and their Local Plan's).
- The impact of plans for employment in other authority areas

### Key evidence base

- Employment Technical Paper, 2015
- Functional Economic Market Area Study, 2015 (FEMA)
- Strategic Land Availability Assessment: Employment, 2015 (SLAA)
- Stevenage Employment and Economy Baseline Study, 2013

### Strategic Partners

- North Hertfordshire District Council
- Central Bedfordshire District Council
- East Hertfordshire District Council
- Welwyn Hatfield Borough Council
- Hertfordshire LEP
- Hertfordshire County Council
- Highways Authority
- Hertfordshire LEP
- HCC
- Herts Chamber of Commerce

### Key Actions

**Action 1:** Targeted consultation carried out by letter.

**Partners:** Over 70 local authorities and relevant organisations

**Outcome:** The consultation asked for opinions on a range of local plan matters related to Stevenage. One of the key aims was to establish whether any other Local Planning Authorities (LPAs) might be willing to accommodate any development needs which we might not be able to provide in Stevenage.

**Date:**

- Consultation carried out – Dec 2012 to Jan 2013

**Action 2:** Letter sent to request assistance in meeting development needs.

**Partners:** NHDC, EHDC and Central Beds.

**Outcome:** Letter identified that Stevenage would be unlikely to be able to meet its employment needs. It did not specifically ask for help in meeting these needs at this stage. Further discussions held subsequently via Duty to Co-operate meetings.

**Date:**

- Letter sent – April 2014



**Action 3:** Joint FEMA produced.

**Partners:** Commissioned jointly by SBC, NHDC and Central Beds.

**Outcome:** The study considered and defined the geographical extent of any FEMA(s) that fall within and across the three commissioning local authority areas.

**Dates:**

- FEMA published – July 2015

**Action 4:** Regular meetings held with neighbouring authorities at both officer and member level.

**Partners:** NHDC, EHDC, WHBC and Central Beds.

**Outcome:** Discussions covered a number of employment-related issues including: FEMA's, employment targets being (likely to be) progressed by each local authority area, sites likely to impact on other authority areas.

**Date:**

- Various

**Action 5:** Employment sites sent to Highways Authority for informal consultation

**Partners:** Highways Authority

**Outcome:** The Highways Authority provided advice on what might be required for each site. The response did not identify any 'showstoppers' in terms of the sites identified for development.

**Date:**

- Response received – 13 Oct 2015
- Consultation sent by email - 15 Sept 2015

**Action 6:** Discussions held with HCA to discuss their response to the SBLP Publication consultation, in which they objected to their land being allocated for employment use.

**Partners:** HCA

**Outcome:** Letter has now been received from the HCA re-confirmed their site (Policy EC1/4) is available for employment use, and they support this allocation.

**Date:**

- Response received – 12 July 2016

## **Outcomes from strategic working**

### **Early stage consultation**

- Of the thirteen LPAs that responded, only three (Epping Forest, LBC and NHDC) said they were willing, in principle, to work with us to meet our development needs.
- Given NHDC's long-standing and strong opposition to making any development provision for Stevenage, and the lack of a published preferred options plan, there was a reluctance to place any reliance on NHDC. Subsequent discussions with Epping Forest and Luton identified that they would not have the physical capacity to accommodate any unmet needs of SBC. As such, further work was considered necessary.

### **Letter to HMA authorities**

- A letter sent to NHDC, EHDC and Central Beds, primarily to ask for help in meeting housing needs, also highlighted that Stevenage would be unlikely to be able to meet its employment needs. This was used as a starting point for further discussions to be held subsequently via Duty to Co-operate meetings.

### **Joint FEMA**

- The joint FEMA provides a consistent, up-to-date, strategic evidence base, agreed by all partners involved in commissioning the study.
- The study identifies one FEMA, which covers the entire study area. Although it recognises that the FEMA does have some overlap with the market in Welwyn Hatfield, which should be considered.
- This study has been used to inform subsequent Duty to Co-operate discussions in seeking to meet Stevenage's unmet needs. Needs are best met within the FEMA, if possible.

### **Meetings with neighbouring local authorities**

- NHDC, EHDC and Welwyn are all at an earlier stage in plan development than SBC. Employment targets are yet to be defined, but draft figures are available.
- Regular meetings (both officer and Member level) ensure timetables and results of evidence studies are shared, and issues are frequently discussed. This helps to ensure a strategic approach is taken and that any political differences are discussed and resolved, where possible.
- It became clear that SBC's employment needs could not be met within the Borough following the first consultation in 2013. Duty to Co-operate meetings thus far had not identified a partner council willing to accommodate the unmet employment needs. NHDC had made it clear that they would not provide any land on the outskirts of Stevenage.
- At subsequent Duty to Co-operate discussions with Central Beds, NHDC and WHBC, those three councils agreed to make provision for around 10ha of Stevenage's employment needs (at Biggleswade, Baldock and Welwyn GC

respectively). This meant that we could demonstrate how we were meeting our employment needs both within and outside the Borough (mainly within the FEMA). This is the strategy contained within the publication version of the Local Plan (Policy SP3).

- Discussions with all three authorities are ongoing and will continue to be held throughout the plan-making progress, and beyond. Updated evidence for WHBC means they feel they can no longer commit to providing additional employment land to meet Stevenage's needs. Sufficient capacity still exists within NHDC and Central Beds and we will continue to work with both authorities to ensure any unmet needs are provided.

### **Site allocations**

- A site previously considered by SBC and HCC for waste purposes has been identified for employment use within the Borough. HCC were consulted on this site and they have confirmed to us that they have no interest in using it for waste purposes (Policy EC1/7).
- The LEP have been actively involved in the promotion of employment floorspace within an extended town centre (Stevenage Central). Their Strategic Economic Plan (SEP) places a big emphasis on the A1(M) growth area and the regeneration of Stevenage town centre to provide homes and jobs to boost the Hertfordshire economy. The Stevenage First board, a partnership including SBC, the LEP, HCC and Herts Chamber of Commerce, was set up to create the Stevenage Central Framework and deliver the regeneration of the town centre. This has actively led to the allocation of office floorspace in the town centre under Policy EC1/5.

### **Feedback from Highways Authority**

- No showstoppers identified in terms of the employment sites sent to the Highways Authority for review. Key transport infrastructure issues and likely requirements were identified and officers were advised where further work was required. Although formal transport modelling has, and continues to be, undertaken, this provided an informal earlier-stage consultation and was helpful in determining whether sites selected were appropriate.

### **Consultation response from the HCA**

- Prior to finalising the SBLP Publication version, the HCA had confirmed they would be happy for us to allocate their site (Policy EC1/4) for employment use. In their response to the consultation, they reneged on this commitment, stating that the site was being considered for starter homes.
- Subsequent discussions with the HCA have been held to iron out this issue. A letter has now been received from the HCA re-confirming that this site is available for employment use and they support the allocation.

### **Consultation response from North Herts**

- NHDC raised a number of objections to the Publication version of the Local Plan. This included an objection to the employment site west of Junction 8 (EC1/7) and the Gunnels Wood Edge of Centre Zone (EC2).
- The Borough Council have carried out additional work to alleviate flood risk concerns raised by NHDC around EC1/7, and further transport modelling is currently being undertaken by HCC.
- Discussions and meetings have since been held with NHDC in an attempt to resolve these objections. No resolutions have been agreed on these two issues.

### **Ongoing co-operation**

- Duty to Co-operate discussions will continue to be held in relation to meeting Stevenage's unmet employment needs, with NHDC and Central Beds, in particular. These two authorities are within the same FEMA and so are best placed for meeting any unmet need of the Borough.
- Engagement with the LEP will also be ongoing, through the Stevenage First Board and the implementation of Stevenage Central.
- Duty to Co-operate activities are reported on in the AMR.
- MoU's currently being drafted with EHDC, NHDC and WHBC. These will set out issues which have agreement and those where the authorities cannot agree. It is hoped that an MoU for each authority will be agreed and signed before the start of the examination process.
- Work will continue with NHDC to try and resolve the objections raised to the Local Plan in advance of the Examination.

## **4. GREEN BELT**

### **Strategic issue**

- Green Belt is not defined by local authority boundaries. A strategic approach to Green Belt is required, ensuring a coherent boundary.
- Green Belt in Stevenage forms a part of the London Metropolitan Green Belt.
- Evidence studies consider and make recommendations for Green Belt across a wider area than is covered by a single local authority.
- Stevenage has very little land available to add back into the Green Belt to complement any release and strengthen overall Green Belt purposes.

<b>Key evidence base</b> <ul style="list-style-type: none"> <li>• Green Belt Technical Paper, 2015</li> <li>• Review of the Green Belt around Stevenage, Part 1, 2013</li> <li>• Review of the Green Belt around Stevenage, Part 2 (including addendum to cover additional parcels), 2015</li> </ul>
<b>Strategic Partners</b> <ul style="list-style-type: none"> <li>• North Hertfordshire District Council</li> <li>• East Hertfordshire District Council</li> </ul>
<b>Key Actions</b> <p><b>Action 1:</b> EHDC and NHDC were asked if they wanted to produce a joint Green Belt Review.</p> <p><b>Partners:</b> NHDC and EHDC.</p> <p><b>Outcome:</b> Both authorities declined the offer. Results were shared with both authorities as soon as they were available (results of the Part 2 study were also shared).</p> <p><b>Date:</b></p> <ul style="list-style-type: none"> <li>• GB Review Part 2 commissioned – April 2015</li> <li>• GB Review Part 1 commissioned – October 2012</li> </ul> <p><b>Action 2:</b> Regular meetings held with neighbouring authorities at both officer and member level.</p> <p><b>Partners:</b> NHDC, EHDC and WHBC.</p> <p><b>Outcome:</b> Discussions covered Green Belt issues, including sharing the results of recent work and proposed sites for allocation.</p> <p><b>Date:</b></p> <ul style="list-style-type: none"> <li>• Various</li> </ul>
<b>Outcomes from strategic working</b> <p><b>Green Belt Review</b></p> <ul style="list-style-type: none"> <li>• Invitations to produce a combined Green Belt Review were turned down by both EHDC and NHDC. However, the results of the Stevenage Review have consistently been shared.</li> <li>• The Green Belt Review, particularly Part 1, provides evidence relating to both NHDC and EHDC local authority areas. It recommends sites that could be removed without harming the overall purpose of Green Belt in this area and sites which could complement Green Belt release and strengthen its overall</li> </ul>

<p>purpose by being added into the Green Belt.</p> <ul style="list-style-type: none"> <li>The Green Belt Review has been used to inform the SBLP (Policy GB1). As the Green Belt around Stevenage reaches right up to the urban edge of the town in most parts, it will be crucial that Duty to Co-operate discussions continue to be held with NHDC and EHDC, to try to ensure the results of the Green belt Review are considered in their plans, or any update to this work/new evidence work commissioned by either authority.</li> </ul>
<b>Ongoing co-operation</b>
<ul style="list-style-type: none"> <li>It is anticipated that both NHDC and EHDC will also be rolling back Green Belt boundaries. Duty to Co-operate discussions will continue to be held, to try and ensure a coherent boundary is achieved.</li> <li>Duty to Co-operate activities are reported on in the AMR.</li> </ul>

<b>5. RETAIL</b>
<b>Strategic issue</b>
<ul style="list-style-type: none"> <li>The regeneration of the town centre is being led by Stevenage First, a partnership including the LEP, SBC, HCC and Hertfordshire Chamber of Commerce.</li> </ul>
<b>Key evidence base</b>
<ul style="list-style-type: none"> <li>Stevenage Central Town Centre Framework, 2015</li> <li>Stevenage Retail Study, 2014</li> <li>Stevenage: Retail and Leisure Capacity Study, 2013</li> </ul>
<b>Strategic Partners</b>
<ul style="list-style-type: none"> <li>Hertfordshire LEP</li> <li>Hertfordshire County Council</li> <li>Hertfordshire Chamber of Commerce</li> </ul>
<b>Key Actions</b>
<p><b>Action 1:</b> Stevenage First formed as a partnership organisation with the aim of regenerating Stevenage town centre. The Stevenage Central Town Centre Framework, commissioned by Stevenage First, was published in July 2015.</p> <p><b>Partners:</b> HCC, LEP and Herts Chamber of Commerce</p>

**Outcome:** The Stevenage Central Framework provides guidance on how the town centre can be successfully regenerated and identifies opportunity areas within which redevelopment should be focussed.

**Date:**

- Stevenage Central Framework published – July 2015
- Stevenage First formed – July 2014

**Outcomes from strategic working**

**Stevenage Central Framework**

- The LEP are actively involved in the regeneration of the town centre (Stevenage Central). Their Strategic Economic Plan (SEP) places a big emphasis on the A1(M) growth area and the regeneration of Stevenage town centre to provide homes and jobs to boost the Hertfordshire economy.
- Stevenage First, a partnership including SBC, HCC, the LEP and Herts Chamber of Commerce, was set up to deliver this regeneration. They published the Stevenage Central Framework in July 2015. One of the key purposes of this Framework was to inform the Local Plan.
- This has actively led to the allocation of new retail floorspace in the town centre under Policy SP4 and the major opportunity area policies (TC2 to TC7).

**NHDC objection to the Local Plan**

- NHDC raised a number of objections to the Publication version of the Local Plan. This included an objection to the convenience floorspace allocation to the north of the Borough (TC11).
- The Borough Council have carried out additional work to alleviate flood risk concerns raised by NHDC around TC11, and further transport modelling is currently being undertaken by HCC.
- Discussions and meetings have since been held with NHDC in an attempt to resolve their objections. No resolutions have been agreed on this issue.

**Ongoing co-operation**

- The regeneration of the town centre will be a long-term project. The delivery of new retail floorspace will likely come towards the end of the timeframe, once the market has picked up enough to support new shops.
- The formation of Stevenage First has provided a commitment from all partners to continue to be involved in town centre regeneration. It will be through this mechanism that joint working continues. Formal meetings are held regularly and the outcomes of these recorded.

## 6. INFRASTRUCTURE AND TRANSPORT

### Strategic issue

- Roads and rail networks cross into various local authority areas, requiring a strategic approach and much co-operation between stakeholders
- The situation with the waste water network is similar. Joint working is required within the catchment area of the Rye Meads Wastewater Treatment Works (WwTW) on the Hertfordshire / Essex border.

### Key evidence base

- Infrastructure Delivery Plan, 2016
- Rye Meads Water Cycle Study Review, 2015
- Stevenage Borough Council Preferred Option Housing Assessment -Transport Modelling Report, 2014
- Water Cycle Study, 2009

### Strategic Partners

- Hertfordshire County Council
- Network Rail
- Herts LEP
- Highways England
- Environment Agency
- Arriva (bus operator)
- Govia Thameslink (rail operator)
- North Hertfordshire District Council
- East Hertfordshire District Council
- Welwyn Hatfield Borough Council
- Broxbourne Borough Council
- Epping Forest District Council
- Harlow Council
- Thames Water
- Anglian Water

### Key Actions

**Action 1:** Infrastructure Delivery Plan (IDP) produced.

**Partners:** Various infrastructure providers relating to strategic issues including healthcare, transport, education, green infrastructure, community facilities, emergency services and utilities.



**Outcome:** The IDP considers the infrastructure required to support the growth of the town and identifies how this will be delivered. It includes costs and likely timescales, which have subsequently fed into the Whole Plan Viability Study.

**Date:**

- Most recent IDP published – 2016
- Liaison with infrastructure providers – various

**Action 2:** Joint Water Cycle Study (WCS) produced.

**Partners:** WHBC, Epping Forest , Broxbourne BC, Harlow Council

**Outcome:** The evolution of this strategy was facilitated by a number of workshops and presentations, to which all stakeholders were invited. The results of this work showed that there were no overwhelming technical constraints to the planned growth in the Rye Meads catchment.

**Date:**

- Published – 2009

**Action 3:** Rye Meads Water Cycle Study Review carried out.

**Partners:** WHBC, Epping Forest , Broxbourne BC, Harlow Council, Environment Agency, NHDC, Thames Water

**Outcome:** The scope of the review was agreed with the EA in Sept 2014. All other partners were involved in the consideration of future water infrastructure demands and / or the production of the update. Affinity Water (AfW) and Anglian Water (AgW) were contacted as part of the review but did not make any substantive contribution to its outputs. The findings of the report have been developed in consultation with, and endorsed by both the Environment Agency and Thames Water.

**Date:**

- Review published – 2015
- EA agreed scope of the review – Sept 2014

**Action 4:** Joint meeting held with Thames and Anglian Water

**Partners:** Thames Water, Anglian Water

**Outcome:** Meeting held to discuss Thames' objections to some housing sites in the Local Plan. Thames clarified that wastewater infrastructure could be provided but that developers needed to liaise with them at an early stage in the planning process. Boundaries between Anglian and Thames also discussed.

**Date:**

- Meeting held – 22 April 2015

**Action 4:** Lobbying for A1(M) improvements

**Partners:** Highways England, NHDC, WHBC, HCC, EHDC, Hertsmere, SACDC

**Outcome:** SBC established the Hertfordshire A1(M) Consortium (now led by HCC), a joint lobby group. This lobbying campaign led to Highways England's current work in initiating improvements to the A1(M) via a SMART motorway scheme.

**Date:**

- SMART Motorway scheme publicised – Dec 2014
- SBC established the Hertfordshire A1(M) Consortium – around April 2009

**Action 5:** Local road network modelling undertaken

**Partners:** HCC, LEP

**Outcome:** Further modelling work is being undertaken by SBC.

**Date:**

- Awaiting outcome of further modelling work

**Action 6:** Town Centre Framework produced. Growth Deal 3 bid submitted.

**Partners:** HCC, LEP, Network Rail

**Outcome:** The Town Centre Framework was produced in consultation with road and rail infrastructure providers. Awaiting the outcome of a Growth Deal 3 Bid.

**Date:**

- Growth Deal 3 bid submitted to the LEP – July 2016
- Town Centre Framework published – July 2105

**Outcomes from strategic working**

**Infrastructure Delivery Plan (IDP)**

- The IDP is designed to be a rolling document, updated frequently as new information is provided. To form the basis for this work, infrastructure providers were asked to determine the level of infrastructure required to support a number of alternative growth scenarios. This helped to inform the SA and earlier stages of plan production, and ultimately determine growth targets for the Local Plan.
- Once growth targets had been decided, infrastructure providers were again asked to respond with infrastructure requirements to support these targets, to inform an updated IDP (2015). This was used to inform the infrastructure requirements set out throughout the Local Plan and particularly the Delivery and Monitoring Section (Chapter 15).

- An updated IDP has recently been produced to take into account any related representations to the SBLP Publication consultation.

### **Waste water capacity – Rye Meads**

- In 2009, SBC, in association with other project partners, commissioned a Water Cycle Study (WCS) for the Rye Meads area. The evolution of this strategy was facilitated by a number of workshops and presentations for key stakeholders. The results of this work showed that there were no overwhelming technical constraints to the planned growth (to deliver the RSS targets to 2021) in the Rye Meads catchment.
- SBC has produced an update of this work to take into account new national policy, which impacts upon housing targets locally. Updated growth targets within the whole Rye Meads catchment area were considered when determining the capacity of the treatment works. The findings have been endorsed by both the EA and Thames Water.
- The study concludes that sufficient capacity is available at Rye Meads to treat wastewater from all planned development, incorporating planned upgrades. This conclusion meant that the levels of growth proposed could be achieved, and this has directly informed the targets within the SBLP, particularly SP7.

### **Thames Water response to Local Plan consultation**

- Thames Water's response to the Publication version of the Local Plan stated that they have 'significant concerns' regarding some of the housing sites (West of Stevenage, North of Stevenage, Bragbury End, The Oval and the Rugby Club). Specifically, they believe that the wastewater network capacity in the area of these developments is highly unlikely to be able to support the anticipated demand.
- Meeting held with Thames and Anglian Water. Thames confirmed that wastewater infrastructure can be provided, but that developers should be required to liaise with them at an early stage in the planning process. Therefore, they maintain their objections and are still seeking changes in wording to reflect this point. Whilst the Borough Council does not believe that Thames Water's representations raise issues of fundamental soundness, if the Inspector were minded to disagree an alternative form of words could be agreed.

### **A1(M)/Highways England (HE)**

- Capacity issues on the A1(M), especially between junctions 6 & 8 around Stevenage, have been a long standing issue for the Borough. During the production of the Core Strategy (now withdrawn), HE objected to the scale of development proposed. They wanted to place a limit on development within the Borough, of up to 1,000 new homes, due to capacity constraints.

- This prompted SBC to establish the Hertfordshire A1(M) Consortium (lobby group). Members included HCC, NHDC, EHDC, and WHBC. HCC have now taken the lead on this group, with SBC still a member.
- Following a successful lobbying campaign, HE are currently designing a SMART motorway scheme to be in place and operational by 2020.
- Highways England's representations to the Local Plan sought further clarification, particularly around the capacity of the roundabouts and slip roads of Junctions 7 & 8, which are the responsibility of HCC as Highways Authority. HCC are currently undertaking modelling work and working on improvement schemes for the slip roads at both junctions. These schemes will require agreement from HE. HCC are also looking at a multi-modal local transport package – encouraging sustainable modes of transport, discouraging short trips etc., to minimise the use of the A1(M).
- At a subsequent meeting with HE, it was confirmed that the new modelling being carried out by HCC should address the modelling concerns raised.
- The DfT/Highways England A1 Route Strategy is currently underway. SBC are a consultee of this project and regularly attends meetings held. This looks at the whole stretch of the A1 between the M25 and Peterborough. It is hoped that this will release capacity to enable further growth in the future.

### **Transport modelling**

- Extensive modelling work has been undertaken by HCC previously, to inform various stages of Local Plan production, amongst other things. Two model types have been used – Saturn and Paramics. The Saturn model looks at the bigger picture and covers a wide area. The Paramics model is more localised, but takes into account the Saturn data.
- SBC have provided HCC with housing and employment data to inform these models and have commissioned model runs previously. The models assess the impacts of development and identify any pressure points in the road network.
- HCC provided late representations on the Local Plan. In these representations they stated that a new Saturn model (COMET) is being constructed and the results of this work would need to be taken into account and fed into the examination process.
- The HCC model currently being run takes into account growth in other districts, based on draft figures. SBC have commissioned a further model run which only tests the impacts of growth within SBC.

### **Town centre regeneration**

- The regeneration of the town centre is a key priority for the Council and forms a key component of the Local Plan. The Stevenage Central Framework, commissioned by Stevenage First (a partnership including SBC, the LEP, HCC and Herts Chamber of Commerce), provides the basis for these plans.
- The Framework identifies major infrastructure interventions required to make

the town centre more permeable and to allow it to expand into a wider central area, including the closure of Lytton Way, the relocation of the bus station and improvements to Stevenage Station.

- All of these require extensive work and collaboration between many different stakeholders, including Network Rail, HCC as Highways Authority and Arriva (other bus operators have not attended meetings so far).
- A proposal for a fifth (terminating) platform for local services is known to be under development by Network Rail. This is currently at option selection phase, due to be completed by December 2019.
- Discussions were been held with Network Rail and Govia Thameslink (the rail operator) during the production of the Framework, and have been held since this time, to gain support for the redevelopment of the Railway Station in line with the 5th platform project. Network Rail supports these proposals.
- A Masterplan for the station has recently been completed (led by HCC) and a Growth Deal 3 bid has been submitted by the Herts LEP, seeking funding to undertake these rail improvements.
- The proposals for the road network around the town centre are included within the modelling work carried out by HCC. Further work will be required to deliver the town centre regeneration proposals. This forms part of a large-scale project being led by Stevenage First.

#### **Ongoing co-operation**

- The IDP is a rolling document. SBC will continue to work with infrastructure providers to ensure any new plans/programmes are included and our evidence is the most up-to-date. An updated IDP has recently been produced to take into account comments made on the Local Plan.
- An MoU is currently being drafted by SBC with the aim of getting both Thames and Anglian Water to agree a way forward.
- Aecom have been commissioned by SBC to carry out another run of the COMET model. Further liaison between SBC and HCC will be required once all of this modelling work has been completed.
- SBC, along with other stakeholders, will continue to lobby Highways England to make much-needed improvements to the A1(M).
- The regeneration of the town centre is being led by Stevenage First. This partnership is committed to working together to deliver the Framework plans. Network Rail play a key role in the proposals to redevelop the railway station and are also on board with the project, having been heavily involved in discussions so far. This will follow a long term timeframe and will form a key part of the delivery of the Local Plan.

## 7. COMMUNITY FACILITIES

### Strategic issue

- Education – school planning areas often have catchments which are wider than local authority boundaries
- Sports facilities – users often travel to reach sports facilities, and provision must be considered within an appropriate catchment area and not confined by Borough boundaries.
- Evidence on sports provision takes into account facilities in the surrounding area.
- Healthcare requirements – The NHS Trust and the CCG cover all of East and North Hertfordshire.
- For all community facilities, the growth plans of other authorities, and their evidence base, need to be taken into account.

### Key evidence base

- Infrastructure Delivery Plan, 2015
- Sports Facility Assessment and Strategy, 2014

### Strategic Partners

- Hertfordshire County Council
- North Hertfordshire District Council
- East Hertfordshire District Council
- Welwyn Hatfield Borough Council
- East and North Herts NHS Trust (NHS Trust)
- East and North Herts CCG (CCG)
- Sport England

### Key Actions

**Action 1:** Various meetings held with HCC regarding education provision

**Partners:** HCC, NHDC

**Outcome:** HCC provided SBC with a list of education requirements likely to arise from housing growth proposed. SBC expressed viability concerns on many proposed sites and requested that the existing schools were looked at more closely, along with urban school formats. Ongoing liaison and some further work led to a positive representation from HCC supporting the level of education provision made within the SBLP.

**Date:**

- HCC confirmed SBC provision was sufficient – Feb 2016
- Meetings held – various, mainly between Nov 2014 to Nov 2015
- HCC provided initial education requirements – 5 Nov 2014

**Action 2:** Sports Facilities Assessment and Strategy produced.

**Partners:** NHDC, EHDC, WHBC, HCC, Sport England, community clubs/groups , National Governing Bodies (NGBs)

**Outcome:** The Assessment and Strategy provides an appropriate, up-to-date evidence base which takes into account the relevant plans, evidence and views of neighbouring authorities and other relevant stakeholders. Sport England confirmed they consider the strategies to be broadly sound and in accordance with their guidance.

**Date:**

- Assessment and Strategy published – Dec 2014
- Sport England confirmed support for the strategy – 14 Nov 2014

**Action 3:** Liaison with the NHS Trust, the CCG (formerly the PCT) and HCC libraries in producing the IDP.

**Partners:** NHS Trust, CCG, HCC libraries

**Outcome:** Figures provided to SBC identifying likely infrastructure requirements arising from the Local Plan. Identified requirements fed into the Local Plan. All parties advised facilities in the town centre were ageing and no longer fit for purpose. This led to their involvement in the town centre regeneration plans.

**Date:**

- Joint meetings held relating to town centre regeneration - various
- Further information submitted by CCG in 2015
- Infrastructure requirements provided by PCT and HCC – 2012

**Action 4:** Liaison with the NHS Trust regarding Lister Hospital

**Partners:** NHS Trust

**Outcome:** No response received to the letter sent in Aug 2015 asking whether the hospital still required land, and for evidence to demonstrate this. SBC allocated a parcel of land for healthcare use, to the north west of the hospital. NHS Trust consultation response argues this allocation does not meet their needs and they require the rugby club site. Insufficient evidence has been provided to show that this is the only practicable solution. Discussions are ongoing.

**Date:**

- Meeting held with NHS Trust – 19 April 2016
- Response to SBLP consultation – Feb 2016
- Letter sent to Lister Hospital – 28 Aug 2015

**Outcomes from strategic working****Education**

- Discussions have been ongoing with HCC to try and resolve issues relating to education provision across the town (and the wider school planning area). NHDC have been involved in some of these meetings, as school planning areas are not confined to local authority boundaries.
- Having sent HCC the proposed housing target for the SBLP, and the allocations expected to be included, HCC came back with a schedule of Primary and Secondary School requirements. SBC assessment of this work identified that the requirements would effectively kill off some of the housing sites proposed, through viability and/or land up-take. SBC emphasised the difficulty it faced in reaching the housing target and that sites could not afford to be lost. A higher-density urban school for the town centre was suggested, as well as further expansion of existing schools. SBC also queried the calculations used.
- Various discussions around this followed. HCC supported reopening the Barnwell East site for Secondary School provision, with any surplus demand being provided in NHDC on a previously identified site. NHDC have stated they require this site to meet housing needs. NHDC/HCC discussions around this are ongoing.
- These discussions directly informed the Plan in making provision for a new Secondary School at the Barnwell East site (Policy HC9) and new Primary Schools within Stevenage West (HO2), North Stevenage (HO3) and the town centre (TC2).
- Representation to the Publication version of the SBLP confirmed that HCC were happy with Primary and Secondary education provision made and that the small surplus in Secondary school demand would be met in NHDC. HCC confirmed that SBC should not be required to make provision of an additional school to meet such a small surplus need, and NHDC would require a school in this area anyway. HCC have identified preferred site in NHDC at Great Ashby: discussions are continuing about how this might be taken forward.
- Following this, HCC have decided to undertake a site search to identify if any alternative options to the NHDC site are available. We are currently awaiting the results of this work, which includes consideration of sites within Stevenage.

**Sports facilities**

- Sport England's response to the first consultation on the Local Plan recommended that a sports facility and playing pitch strategy was produced to inform the next stage of the Plan. In accordance with these comments, consultants were appointed to undertake this work.
- Relevant stakeholders were consulted at various stages in the process of



completing this work, and emerging/adopted plans and evidence work for EHDC and NHDC was incorporated into the study.

- The Strategy was produced in accordance with best practice guidance from Sport England, and Sport England confirmed they consider the work to be broadly sound and in conformity with their guidance.
- This evidence has been used to inform specific policies within the SBLP, particularly policies relating to the redevelopment of the arts and leisure centre (TC4 & TC7), the loss of Meadway playing fields (IT2), the future of the Rugby Club (HO1/11), redundant sports facilities at Bragbury End (HO4) and new/existing facilities (HO2, HO3, HO4, HO6 to HC10).
- Sport England supported many policies within the SBLP, however, they also made some objections to policy wording in some parts. Whilst the Council does not believe that Sport England's representations go to issues of fundamental soundness, if the Inspector were minded to disagree, an alternative form of words could be agreed. Discussions will be held with Sport England in advance of the Examination to further understand and attempt to resolve the issues they raised.

### **GP surgeries**

- The East and North Herts NHS Trust (formerly the PCT) was consulted on their infrastructure requirements via the production of the IDP. The Trust was originally provided with a number of alternative growth scenarios and asked to provide SBC with information regarding the infrastructure likely to be required for each. The response received in 2012 was fed into the IDP.
- The IDP was updated in 2015, with new data provided on healthcare. This provided an up-to-date evidence base to directly inform the Plan. To help address identified healthcare needs, Policy HC5 safeguards a site (with planning permission for a GP surgery) for healthcare use. New GP surgeries are also required in all of the urban extensions (HO2, HO3 & HO4).
- The CCG response to the Local Plan raised issues with the way the data they provided had been presented in the IDP. They requested alterations to the IDP. Further information has also been provided by the CCG. This has been fed into an update of the IDP.
- The data remains the same, it will just be presented differently. This will, therefore, have no impact on the SBLP proposals.

### **Town centre regeneration**

- The NHS Trust and the CCG are also involved in plans to regenerate the town centre. During work on the IDP, both parties advised that their facilities within the town centre were ageing and no longer fit for purpose. Subsequently, meetings were held with both parties, along with HCC, who own the adjacent library, to discuss future plans for this part of the town centre.
- It was identified that this provided an opportunity for new homes to be provided in a prominent gateway location, and for a new public sector hub to be created, to include the library, NHS services and potentially a relocation of the council

offices.

- A number of joint meetings were held with the NHS Trust, the CCG and HCC. The discussions arising from these meetings directly informed the creation of the Stevenage Central Framework, which in turn, provides a key basis for town centre policies within the Local Plan.
- The delivery of town centre regeneration is now being led by Stevenage First, via a partnership approach.

### **Lister Hospital**

- The NHS Trust have previously expressed a desire to expand the Lister Hospital beyond its current boundary to meet future needs. They suggested the Rugby Club site (directly to the north) would provide the only opportunity for meeting this requirement.
- SBC took a positive approach to this request. During production of the Core Strategy (now withdrawn) SBC were actively working with the NHS Trust and the Core Strategy stated that a site would be planned for, with NHDC, through SNAP. As explained in Para's. 3.2 & 3.3 of this Statement, SNAP did not progress beyond key issues stage.
- Throughout these discussions, SBC has frequently asked the Trust to provide evidence to justify the need for expansion and how it will be delivered. Nothing robust has ever been submitted.
- Following significant changes made to hospital services across the region, completed in 2014, a letter was sent to the Trust asking if they still required land for expansion and explaining they would need to provide evidence to SBC, to justify this requirement. No response was received from the Trust.
- In their representation to the Publication version of the SBLP, the Trust objects to the allocation of the Stevenage Rugby Club site on North Road for housing. They are seeking the allocation of three acres of this land at the western end of the site for hospital expansion.
- Following this representation, SBC have been liaising with both the NHS Trust and the owners of the Rugby Club land, to see if any resolution can be found. No resolution has been agreed.
- The Trust have not submitted any information to support their request for the Rugby Club land and it is understood that they have never put forward a proposal to purchase this land
- The Local Plan allocates a parcel of land to meet any future requirements of the hospital and other healthcare needs (Policy HC3). The Rugby Club site is required to meet the SBLP housing target.

### **Ongoing co-operation**

- SBC are currently awaiting the results of further work on Secondary School provision being carried out by HCC. A meeting is scheduled to discuss these results with HCC (jointly with NHDC and EHDC).

- Discussions will be held with Sport England in advance of the Examination to further understand and attempt to resolve the issues they raised.
- The CCG have recently provided SBC with new data to input into the IDP and the IDP has been updated to reflect this, and other, new information provided.
- Discussions are ongoing with the NHS Trust and the Rugby Club. We will soon be writing to invite both parties to a joint meeting to enable further negotiations.

## 8. CLIMATE CHANGE, FLOODING AND POLLUTION

### Strategic issue

- These issues are not confined to local authority boundaries. Not dealing with these issues effectively in one area can have negative impacts in other areas, flood risk particularly.

### Key evidence base

- Level 1 SFRA, 2016
- Level 2 SFRA, 2016
- Rye Meads Water Cycle Study Review, 2015

### Strategic Partners

- Environment Agency
- Natural England
- Hertfordshire County Council

### Key Actions

**Action 1:** Identification of Hertfordshire as a water stress area

**Partners:** EA

**Outcome:** A consultation carried out by the EA concludes that Hertfordshire has some of the highest water use per person in the country and that Stevenage is in an area of 'water stress'.

**Date:**

- Outcome published in the Rye Meads Water Cycle Study Review – 2015

**Action 2:** Level 1 SFRA produced to take into account new climate change allowance data.

**Partners:** EA

**Outcome:** Level 1 SFRA formally approved by the EA. This updated previous SFRA's used to inform the Local Plan.

**Date:**

- Level 1 SFRA published – June 2016
- Letter received from the EA supporting the SFRA – 3 June 2016
- Updated climate change allowance data published – Feb 2016

**Action 3:** Level 2 SFRA produced for parts of Ash Brook and Stevenage Brook within the Stevenage Borough boundary.

**Partners:** EA

**Outcome:** Level 2 SFRA undertaken, as per the recommendations made by the EA in their response to the Publication version of the SBLP. SFRA formally approved by the EA. No allocated sites were shown to be inappropriate for development. The SFRA will also inform site specific considerations and mitigation required at application stage.

**Date:**

- Level 2 SFRA published – June 2016
- Letter received from the EA supporting the SFRA – 3 June 2016

**Action 4:** Regular meetings with London Luton Airport Consultative Committee (LLACC) attended by SBC

**Partners:** London Luton Airport, LLACC

**Outcome:** SBC is involved in preparing joint responses to London Luton Airport consultations. Policies within the Local Plan consider the impacts of the airport and the flight path over the Borough.

**Date:**

- Meetings held quarterly

#### **Outcomes from strategic working**

##### **Identification of water stress area**

- The Rye Meads Water Cycle Study Review was produced taking into account Environment Agency data. This identifies Stevenage as being in an area of 'water stress'.

- This is dealt with directly in the SBLP through Policy FP1, which implements the optional standard (as set out in NPPG) requiring new development to reduce water consumption to no more than 110 litres per person per day. This will be controlled and monitored via Building Regulations.

### **Level 1 SFRA**

- Due to the release of new climate change allowance data, a Level 1 SFRA was required to take this into account and update the previous Assessment.
- This work was completed by consultants on behalf of SBC, and was formally approved by the EA. Within this approval the EA queried the use of the Thames river basin allowances, as opposed to the Anglian allowances. SBC have since confirmed that the Thames allowances are not more conservative, and are in fact higher. The SFRA has been amended to clarify this point and that SBC are adopting the higher Thames levels in order to provide continuity and ensure that the town is future-proofed as much as possible.
- The SFRA update did not identify any allocated sites that would no longer be suitable for development, nor did it require any changes to the SBLP.

### **Level 2 SFRA**

- The response to the SBLP Publication consultation from the EA recommended that a Level 2 SFRA was completed for certain parts of the town. In accordance with this advice, consultants were appointed to complete this work. The Assessment has been formally approved by the EA.
- The Level 2 SFRA did not identify any allocated sites that would no longer be suitable for development, nor did it require any changes to the SBLP.
- The results of this work have been shared with the potential developers of the sites affected.

### **London Luton Airport**

- SBC attends regular meetings with the London Luton Airport Consultative Committee (LLACC). This ensures we stay up-to-date with any development proposals and issues relating to the airport, and also allows SBC to be involved in any joint responses made to the airport on behalf of the effected local authorities and organisations.
- A strategic approach is often taken to responses to consultations, with joint responses being made from LLACC as a whole, and SBC also discussing these issues and sometimes providing joint responses with other Herts local authority members, including HCC.
- Policy FP8 recognises the close proximity of London Luton Airport to the Borough and requires development which has the potential to be affected by aircraft noise to be subject to conditions ensuring an adequate level of protection against noise impacts.

### Ongoing co-operation

- The results of the Level 2 SFRA will be further implemented through site specific considerations and discussions held at the application and/or masterplanning stage. The EA are consulted on all applications within flood zones 2 and 3, and those that have significant drainage issues.

## 9. THE NATURAL ENVIRONMENT

### Strategic issue

- The designation of some green infrastructure assets is subject to data from external organisations. This ensures a consistent approach is taken across the county.
- Green infrastructure is not confined to local authority boundaries. Joint studies can enable a cross-boundary approach that provides a better strategic outcome.

### Key evidence base

- Open Space Strategy, 2015
- Wildlife Sites Review, 2013
- Stevenage Landscape Sensitivity and Capacity Study, 2006

### Strategic Partners

- Hertfordshire Local Nature Partnership (LNP)
- Hertfordshire County Council
- Natural England (NE)
- Herts and Middlesex Wildlife Trust (HMWT)
- North Hertfordshire District Council
- East Hertfordshire District Council

### Key Actions

**Action 1:** Herts Landscape and Green Infrastructure Group meetings

**Partners:** HCC, All Herts local authorities

**Outcome:** Meetings held quarterly provide the opportunity to discuss opportunities for joint work and to share knowledge.

**Date:**

- Meetings – held quarterly

**Action 2:** Joint Stevenage Landscape Sensitivity and Capacity Study produced

**Partners:** NHDC

**Outcome:** Joint study undertaken to assess greenfield sites within Stevenage and North Herts for their development potential.

**Date:**

- Study published - 2013

**Action 3:** Local Wildlife Sites data provided to SBC on an annual basis. Wildlife Sites Review carried out in 2013.

**Partners:** HMWT (and others that form the LWS Partnership)

**Outcome:** SBC is provided with up-to-date LWS data annually. This directly informs the Local Plan. A Wildlife Sites Review ensured that existing sites were all still appropriate in terms of their protection.

**Date:**

- Data provided to SBC – annually
- Wildlife Sites Review published - 2013

**Action 4:** Statement submitted to the LNP to demonstrate accordance with its guiding principles.

**Partners:** Herts LNP

**Outcome:** Statement reviewed by the LNP. Letter received demonstrating that the SBLP is generally in accordance with the guiding principles. Recommendations provided on how the statement could be improved to better reflect LNP objectives. Subsequent amendments made to the statement in accordance with these comments. No changes to the SBLP required.

**Date:**

- Amended Statement produced – July 2016
- Response from the LNP received – 7 June 2016
- Statement of Accordance sent to the LNP – 2 March 2016
- Email received from the LNP co-ordinator explaining the preferred Duty to Co-operate process – 26 Jan 2016

**Action 5:** HRA Appropriate Assessment (AA) sent to Natural England for review.

**Partners:** Natural England

**Outcome:** Verbal discussions held with NE. Amendments to the AA suggested. SBC incorporated the proposed amendments and sent the AA back to NE. No response received. NE provided a response to this in conjunction with their response to the SBLP and SA (discussed further under Action 6).

**Date:**

- Revised AA sent to NE – Nov 2015 (Re-sent Dec 2015 and Jan 2015)
- Verbal communications with NE – Nov 2015
- AA sent to NE – Autumn 2015

**Action 6:** Various discussions and meetings held with NE to resolve their objections to the SBLP, the SA and the AA.

**Partners:** Natural England

**Outcome:** Objections discussed verbally and a subsequent meeting held. Whilst SBC does not believe that NE's representations go to issues of fundamental soundness, if the Inspector were minded to disagree, an alternative form of words could be agreed. Potential alternative wording discussed with NE, along with proposed amendments to the SA and AA. NE agreed to all proposals. The AA and SA have been updated to reflect this. MoU has been signed by NE.

**Date:**

- MoU signed by NE – June 2016
- Letter received from NE confirming agreement to all proposed changes/points to raise with the Inspector – 9 May 2016
- Meeting held – March 2016

**Action 7:** Various discussions held with the EA in relation to their Local Plan consultation response

**Partners:** EA

**Outcome:** Objections discussed verbally. Whilst SBC does not believe that the EA's representations go to issues of fundamental soundness, if the Inspector were minded to disagree, an alternative form of words could be agreed. Potential alternative wording discussed with the EA. SBC explained to the EA why other representations were not considered to require further action. The EA have verbally agreed to this approach. MoU drafted and verbally agreed by the EA. Awaiting formal signature.

**Date:**

- MoU drafted and agreed verbally by EA – June 2016
- Discussions held with EA (verbally)



## **Outcomes from strategic working**

### **Herts Landscape and Green Infrastructure Group Meetings**

- SBC attends quarterly meetings as a member of the Herts Landscape and Green Infrastructure Group. This includes all Hertfordshire Local Authorities, and is run by HCC.
- These meetings provide the opportunity to discuss joint work, share best practice guidance and ideas, and to try and ensure a consistent and strategic approach is taken to the natural environment across the county.
- Meeting outputs are also fed back to the Herts LNP.

### **Stevenage Landscape Sensitivity and Capacity Study**

- The Stevenage Landscape Sensitivity and Capacity Study was a joint study produced on behalf of both SBC and NHDC. This was based around the (now revoked) RSS figures for the study area.
- The key aim of this study was to provide a transparent and consistent assessment of landscape sensitivity and capacity of the landscape, to identify potential growth areas where new development could best be accommodated without unacceptable adverse landscape and visual impacts, and to identify essential mitigation measures.
- A joint study allows for the wider impacts of any loss of green spaces to be considered, and provides a strong basis for agreement on development sites. The results have been used to inform SBLP site selection, particularly the urban extensions (Policies HO2, HO3 and HO4 and employment site EC1/7).

### **Local Wildlife Sites (LWS)**

- Hertfordshire has an established LWS Partnership, to record the species and habitats across the county at a site by site level, and then to identify and protect areas considered to be of significance for wildlife. The Partnership now includes a regular board of 12 organisations including HCC, Natural England, HMWT, Herts Environmental Records Centre (HERC), Countryside Management Service (CMS), Environment Agency (EA), Forestry Commission (FC), Lee Valley Regional Park Authority (LVRPA), Herts LNP, Herts RIGS Group, and Chilterns Conservation Board (CCB).
- The LWS dataset is updated and given to all local authorities on an annual basis.
- In 2012, SBC commissioned a review by the HWMT of the 37 Local Wildlife Sites in the Borough. The sites were surveyed by experienced botanists, following the established methodology agreed for Hertfordshire.
- Both the annual LWS data and the 2013 Review have directly informed the allocation of Wildlife Sites within the SBLP (Policy NH2). All identified LWS are protected.

### **Statement of accordance with the LNP**

- Communications with the LNP led to clarification that due to resource limitations, they prefer to deal with the Duty to Co-operate via the submission of a Statement of Accordance with their guiding principles by local authorities.
- A Statement of Accordance was produced by SBC and sent to the LNP in Jan 2016. Following a review of this Statement, the LNP confirmed that they welcome the approach taken by SBC to reflect the principles in the SBLP and that the plan accords with all six principles, at least in part, if not in full.
- A full review of the Statement provided recommendations on how the Statement could be improved to better reflect LNP objectives. Subsequent amendments have been made to the statement in accordance with these comments. No changes to the SBLP were required. The LNP have been asked if they wish to review the revised statement. We are currently awaiting a response.

### **HRA Appropriate Assessment and discussions held to resolve Natural England objections**

- There is a requirement for all Local Plans to be subject to an AA. The AA Screening Opinion was carried out in order to determine whether the Plan required a full HRA. The conclusion of this screening report was that we did not need to carry out a full HRA.
- The AA was initially sent to NE for comment prior to the Plan being finalised for Publication stage consultation. The NE requested further detail on the Plan's proposals before it could provide full comments. Further discussion with NE led to some changes being made to this Assessment. Although the revised AA was sent back to NE for approval, no response was received.
- A response was received in relation to the AA, in conjunction with NE's representation on the Local Plan and the SA. NE objected to parts of the SBLP, SA and the AA.
- SBC and NE discussed these objections verbally and a subsequent meeting was held. Whilst SBC does not believe that NE's representations go to issues of fundamental soundness, if the Inspector were minded to disagree, an alternative form of words could be agreed. Potential alternative wording has been discussed with NE, along with proposed amendments to the SA and AA. NE has agreed to all of these proposals. Accordingly, the AA and SA have been updated to reflect this.
- A MoU has been signed by the EA, confirming approval of all proposed amendments to the SA and AA, and agreement of an approach to resolving objections to the Local Plan.
- However, NE's objections to the Local Plan will still need to be resolved through the Examination process.

### **Discussions held to resolve EA objections**

- The EA objected to parts of the SBLP at the Publication consultation.
- Discussions have since been held with the EA to try and understand these objections and to seek resolution, where possible.
- In relation to the comments on the Water Framework Directive, whilst SBC does not believe that the EA's representations go to issues of fundamental soundness, if the Inspector were minded to disagree, an alternative form of words could be agreed. Potential alternative wording has been discussed with the EA.
- SBC explained to the EA why other representations were not considered to require further action. The EA have verbally agreed to this approach.
- A MoU has been drafted and verbally agreed by the EA. It is currently awaiting formal signature.
- However, the EA's objections to the Local Plan will still need to be resolved through the Examination process.

### **Ongoing co-operation**

- LWS data is provided to the Borough Council on an annual basis. Policy NH2 makes allowance for new LWS to be added, or for existing sites to be removed following adoption of the Plan.
- The AMR monitors green infrastructure indicators annually, and records any loss of LWS, open space and other assets.
- Although the LNP expressed general support for the SBLP, discussions with are ongoing in relation to the Statement of Accordance. SBC are currently awaiting a reply to communications sent with regards to the revised Statement produced.
- Agreement has been reached with both NE and the EA. However, further work will be required at the Examination stage, to try to ensure an outcome that both parties are satisfied with.

## **10. THE HISTORIC ENVIRONMENT**

### **Strategic issue**

- Hertfordshire County Council Historic Environment Unit hold up-to-date data on heritage assets

<ul style="list-style-type: none"> <li>• Lists of heritage assets are held by Historic England on the National Heritage List for England (NHLE)</li> <li>• Historic England provide best practice advice for plan making</li> </ul>
<b>Key evidence base</b>
<ul style="list-style-type: none"> <li>• Areas of Archaeological Significance (GIS layer), 2012</li> <li>• Conservation Area Management Plans (x7), 2012</li> </ul>
<b>Strategic Partners</b>
<ul style="list-style-type: none"> <li>• Hertfordshire County Council (Historic Environment Unit)</li> </ul>
<b>Key Actions</b>
<p><b>Action 1:</b> Data (in the form of a GIS layer) regularly received from HCC identifying Areas of Archaeological Significance (AAS).</p> <p><b>Partners:</b> HCC</p> <p><b>Outcome:</b> The latest GIS data was received in 2012. This has been used to directly inform AAS allocations in the SBLP (Policy NH09).</p> <p><b>Date:</b></p> <ul style="list-style-type: none"> <li>• Email sent to confirm this is still the most up-to-date information - 2015</li> <li>• AAS data received - 2012</li> </ul>
<p><b>Action 2:</b> Meeting held with Historic England to discuss draft Local Plan policies.</p> <p><b>Partners:</b> Historic England</p> <p><b>Outcome:</b> Historic England suggested a positive, locally specific approach to policies relating to the historic environment. A policy specifically identifying the conservation areas within the Borough was recommended, which has been accommodated under (Policy NH10). Outcomes relating to specific housing sites are discussed under Issue 1: Housing.</p> <p><b>Date:</b></p> <ul style="list-style-type: none"> <li>• Meeting held – 2 Sept 2015</li> </ul>
<b>Outcomes from strategic working</b>
<p><b>Meeting with Historic England</b></p> <ul style="list-style-type: none"> <li>• Following representations made on previous versions of the Local Plan and an invitation from Historic England to discuss the Plan in more detail, a meeting was held. Local Plan draft policies were discussed and advice was provided.</li> <li>• Historic England advised that a locally-specific conservation area policy should</li> </ul>

be included, identifying the conservation area boundaries and pointing developers towards guidance set out in the Conservation Area Management Plans.
<b>Ongoing co-operation</b>
<ul style="list-style-type: none"> <li>We will continue to work with Historic England through the masterplanning phases of those larger sites affecting heritage assets, particularly North Stevenage and the town centre – to ensure any impacts are minimised and/or mitigated, where possible.</li> </ul>

## 5. Other Duty to Co-operate issues

- 4.1 As well as discharging the Duty to Co-operate in relation to those specific Local Plan-related issues listed in Section 5, the Borough Council has also been engaged with various other organisations, the outputs of which have informed the context of the Plan.

### Taking into account the needs/plans of London

- 4.2 The SBC Portfolio Holder for Environment has attended regular meetings held by the Greater London Authority (GLA), particularly in relation to the London Plan.
- 4.3 The Portfolio Holder will be attending meetings held to discuss the next iteration of the London Plan.
- 4.4 It is expected that London will need to disperse any future housing targets into surrounding areas in order for needs to be met. Therefore it is important to stay involved and up-to-date in this issue, as it has the potential to impact SB, and the wider HMA in the future.

### Other transport-related work

- 4.5 SBC has been a regular attendee of the East Coast Mainline Consortium of Authorities (ECMA). This includes all authorities situated along the East Coast Mainline (ECML). SBC was one of the founder members of this lobby group, which seeks to get further investment into the ECML.
- 4.6 SBC also regularly attends the East West Rail Consortium (EWRC), a lobby group seeking to impact the East West Rail project. This group is primarily made up of local authorities along the proposed routes previously discussed (from Oxford to Cambridge).

## **APPENDICES**

## APPENDIX 1: Duty to Co-operate bodies

The 'duty to co-operate' relates to matters which have a significant impact on two or more local planning areas, including infrastructure. It applies to Councils and other plan-making bodies with responsibility for preparing development plan documents, and extends to preparation and evidence support of development planning.

The duty also covers a number of public bodies in addition to councils set out in Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012 and comprising the following applicable bodies:

- *Environment Agency*
- *Historic England*
- *Natural England*
- *Mayor of London*
- *Civil Aviation Authority*
- *Homes and Communities Agency*
- *East and North Hertfordshire Clinical Commissioning Group*
- *East and North Hertfordshire NHS Trust*
- *Office of the Rail Regulator*
- *Highways England*
- *Transport for London*
- *Hertfordshire County Council [as Highway Authority]*

All the above authorities have been contact during the process of plan preparation.

In the case of Stevenage, the duty applies to the organisations specified above and neighbouring authorities, principally:

- *East Hertfordshire District Council*
- *North Hertfordshire District Council*
- *Central Bedfordshire District Council*
- *Luton Borough Council*
- *Welwyn Hatfield Borough Council*
- *Hertfordshire County Council*

The Hertfordshire Local Enterprise Partnerships (LEP) and the Hertfordshire Local Nature Partnership (LNP) are not subject to the requirements of the duty. However, the NPPF and NPPG state that LPAs must co-operate with LEPs and LNPs, and have regard to their activities when preparing Local Plans, accordingly, we have worked with these bodies when producing the Local Plan.

## APPENDIX 2: Evidence of key Duty to Co-operate actions

### Appendix 2a – HOUSING

Action 1: Targeted early stage consultation – letter to Duty to Co-operate bodies

**Planning, Regeneration and Transport**  
Head of Planning, Regeneration and Transport: Viv Evans  
Dip TP, MRTPI

  
**Stevenage**  
BOROUGH COUNCIL

Daneshill House, Danestrete, Stevenage, Herts SG1 1HN • Tel: 01438 242242 • Textphone: 01438 242555 • Fax: 01438 242566 • [stevenage.gov.uk](http://stevenage.gov.uk)

Your Ref:  
Our Ref:  
Contact: Nigel Smith  
Direct Line:  
Fax: 01438 242922  
E-mail:

Date: 14 December 2012

Dear Sir / Madam,

**Stevenage Borough Local Plan ~ early stage consultation**

We have recently started work on a new Local Plan for the period to 2031. Our Local Development Scheme is available on our website, [www.stevenage.gov.uk](http://www.stevenage.gov.uk), and sets out our proposed timetable. We are currently preparing our evidence base and intend to carry out our first formal public consultation in June 2013.

We wish to engage constructively, actively and on an on-going basis from an early stage on planning issues that cross administrative boundaries, as required by the Duty to Co-operate and other advice in the National Planning Policy Framework.

I would, therefore, welcome any early views that you have on the issues you feel our new plan should address. This will help to inform any future discussions we might have under the Duty to Co-operate as well as helping to shape the content of the emerging Local Plan.

To help guide your response, we have prepared a short survey. This can be completed online at . Please provide any comments by **31 January 2013**. A hard-copy of the questions is available on request.

I have also enclosed a copy of our first stakeholder newsletter, which I hope that you find interesting. We intend to distribute further editions as our plan is progressed.

If you have any further queries, or would like to discuss the Duty to Co-operate or other planning matters in more detail, please contact the planning policy team using the details provided.

Yours sincerely

Richard Javes  
Planning Policy Manager

2002-2003  
Neighbourhood Renewal  
2000-2001  
Preventing Crime and Disorder

POSITIVE ABOUT  
DISABLED PEOPLE

INVESTOR IN PEOPLE



## Action 1: Early stage consultation summary of responses

Consultee	Response?	Willing, in principle, to work together on joint strategies etc?	Willing, in principle, to meet development needs?	Reasons
<b>Surrounding parishes</b>				
Graveley CP	Yes			
Great Ashby CP				
Walkern CP				
Aston CP	Yes			
Datchworth CP	Yes	Yes	Yes	
Knebworth CP	Yes			
Langley CP				
St Ippolyts CP	Yes			
Wymondley CP	Yes			
<b>Total consulted: 9</b>	<b>6</b>			
<b>Local planning authorities</b>				
Broxbourne BC	Yes	No	No	Did not answer questions
Dacorum BC				
East Herts DC				
Hertsmere BC				
North Herts DC				
St Albans C&DC	Yes	No	No	Did not answer questions
Three Rivers DC	Yes	Yes (infrastructure)	No	No relationship with Stevenage
Watford BC	Yes	No	No	Did not answer questions
Welwyn Hatfield BC	Yes	Yes	No	Constrained capacity
Epping Forest DC	Yes	Yes	Yes	
Harlow	Yes	No	No	Did not answer questions
Uttlesford DC	Yes	No	No	Do not share common issues
South Cambs DC				
Central Bedfordshire UA				
Luton UA	Yes	Yes	Yes	
Aylesbury Vale DC	Yes	No	No	Did not answer questions
Chiltern DC				
South Bucks DC				
LB Harrow	Yes	No	No	Best achieved through other mechanisms
LB Barnet				
LB Enfield				
<b>Total consulted: 21</b>	<b>11</b>			

Action 1: Early stage consultation summary of responses, continued.....

Consultee	Response?	Willing, in principle, to work together on joint strategies etc?	Willing, in principle, to meet development needs?	Reasons
<b>County councils and LEPs</b>				
Hertfordshire CC	Yes	Yes		
Essex CC	Yes	Yes		
Cambridgeshire CC				
Buckinghamshire CC				
Hertfordshire LEP	Yes	Yes		
Buckinghamshire Thames Valley LEP				
Greater Cambridge & Peterborough LEP				
South East LEP				
South East Midlands LEP	Yes	Yes		
<b>Total consulted: 9</b>	<b>4</b>			
<b>Other bodies</b>				
Alkane				
Anglian Water				
Arriva				
British Gas Pipelines Limited				
Centrebus				
Civil Aviation Authority	Yes			
Communications Act parties				
East Coast				
East of England Ambulance service				
ECG (Distribution) Limited				
English Heritage	Yes			
Environment Agency	Yes	Yes		
ES Pipelines Ltd				
ESP Electricity Limited				
First Capital Connect				
Fulcrum Pipelines Limited				
GTC Pipelines Limited				
Hertfordshire Policy Authority				
Highways Agency	Yes	Yes		
Homes and Communities Agency	Yes	Yes		
Independent Pipelines Limited				
Intoto Utilities Limited				
Marine Management Organisation	Yes			
Mayor of London	Yes	No		
National grid	Yes	No		
Natural England	Yes			
Network Rail Infrastructure Ltd				
NHS Hertfordshire				
Office of Rail Regulation				
Thames Water	Yes			
Transport for London	Yes	Yes		
UK Power Networks (IDNO) Limited				
Uno				
Veolia Water				
<b>Total consulted: 34</b>	<b>11</b>			
<b>Grand total: 73</b>	<b>32</b>			

Previously advised we do not need to consult:

The Coal Authority

**4**

## **Late responses and clarifications**

### **4 Late responses and clarifications**

#### **Late responses**

**4.1** Two additional responses were received following the close of the consultation. These were from:

- East Hertfordshire District Council (EHDC) (received February 2013); and
- North Hertfordshire District Council (NHDC) (March 2013)

**4.2** The EHDC response recognised the importance of the strategic issues raised and the role and function of Stevenage in providing jobs and services to its residents. However, the Council felt unable to respond to many of the questions given the early stage of preparation of their own local plan. This included the question of working together to meet development needs.

**4.3** The NHDC response confirmed, in principle, that they would be willing to co-operate on strategic matters and to consider meeting unmet development needs from Stevenage. It was NHDC's view that each authority should prepare separate local plans but participate in joint working where needed.

#### **Clarifications**

**4.4** Further discussions have been held with both Epping Forest and Luton councils. This followed their positive responses to the question of meeting development needs.

**4.5** Both authorities have subsequently clarified that they will not be in a position to meet needs from Stevenage due to a lack of physical capacity.

Action 2: Letter sent to HMA authorities – seeking help with housing needs

**Planning, Regeneration and Transport**

Interim Head of Planning, Regeneration and Transport:  
Paul Pinkney



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To:  
Simon Andrews, Central Bedfordshire Council  
Louise Symes, North Hertfordshire District Council  
Bryan Thomsett, East Hertfordshire District Council

By email

Your Ref:  
Our Ref:  
Contact: Richard Javes  
Direct Line: 01438 242962

E-mail:  
[richard.javes@stevenage.gov.uk](mailto:richard.javes@stevenage.gov.uk)

Date: 11 April 2014

Dear Colleague

**Housing provision for Stevenage / Duty to Co-operate**

I am writing further to Councillor John Gardner's recent letter to his counterparts at your respective authorities. Councillor Gardner's letter set out, in broad terms, some of the issues Stevenage currently faces with regards to its plan making. This letter seeks to reiterate these points and provide some further technical information.

As you will be aware, we carried out an Issues and Options consultation on a new local plan for the Borough last year. This identified three potential options for a future housing target.

The Council identified Option b: Borough Capacity ~ 5,300 homes as its preferred option. This was also adopted as an interim target for housing provision.

The selection of this option was, in large part, based on the facts that it would have allowed us to both maximise development potential within the Borough and meet the rates of growth contained in the Government's interim 2011-based population and household projections when 'rolled forward' across the whole plan period.

Such an approach might have been viewed, at the time, as being consistent with the requirements of the NPPF insofar as they related to meeting objectively assessed needs for housing.

We now expect our official projections to rise significantly when the new population projections are released next month, followed by the household projections later in 2014. This has major implications for our plan-making.

The 2011 Census results show that ONS had been underestimating the Borough's population and, by extension, the rate at which it has changed. The population in 2011 was around 3,000 higher than projections had previously anticipated. These





underestimates were contained in both the 2008-based and 2010-based population projections and continued to influence the interim 2011-based projections.

All three projections anticipated that the Borough's population would grow at a rate of around 0.5% per annum in the future. We have carried out further analysis which suggests that population growth within the Borough since 2007 has been estimated at closer to 1% per annum. The trends experienced in this period will underpin the forthcoming 2012-based population and household projections.

The implications of this are significant. Although there are a number of factors at play, we now strongly expect that the forthcoming 2012-based projections will suggest a requirement for in the region of 7,000 – 8,000 new homes in Stevenage over the period 2011 to 2031. This will, by default, become our new, baseline 'with migration' projection against which any alternatives should be considered, as per advice in both the NPPF and NPPG.

It is important to note that, in this period, development rates within the Borough have been broadly in line with long-term averages; we do not consider that this higher level of population growth has been fuelled by unusually high rates of housing completions.

During the five-year period 2007-12, we completed an average of 295 homes per year. This is broadly consistent with both the 20- and 30-year averages of approximately 300 homes per year.

The Borough Council has yet to make any formal decision on a future housing target or, indeed, any range of potential targets that takes this information into account. However, we fully anticipate a mismatch between our development needs and deliverable capacity for housing. This is a reverse of the situation when we consulted with you last summer.

The scale of the shortfall has yet to be definitively quantified. We will be in a position to provide greater clarity next month once the population projections are released and we update our SLAA estimates to the end of the most recent financial year.

Based on the policies of the NPPF and a number of recent examinations, it is clear we will not simply be allowed to 'write off' any shortfall without transparently exploring how it might be met and seeking willing partners to meet those housing development requirements which cannot be wholly met in our own area due to a lack of physical capacity.

I am therefore writing to you, in the first instance, as the authorities with whom it is commonly accepted we share the strongest housing market area links with. This is based upon studies conducted for your authorities by Opinion Research Services and our own analysis of existing data sources.

I am asking you to give early consideration to our position and how this relates to your own plan-making activities. If you consider your authority may be in a position to make a positive contribution towards meeting any unmet housing needs arising from Stevenage, I would be grateful if you could notify me at the earliest opportunity so that we can establish appropriate (or strengthen existing) connections to allow this matter to be discussed further.

We face similarly challenging issues with regards to employment. Our baseline employment study and, subsequently, our local plan consultation identified a preferred requirement for between 20 and 30 hectares of new employment land across the plan period.

The local plan consultation identified six potential locations that might make a significant contribution towards this. However, the landowners of two of these have now withdrawn their sites from consideration. This includes the land at Junction 7 of the A1(M) which had previously been identified as a potential location for a strategic employment site and been subject to joint work with North Hertfordshire District Council to bring forward.

Other options are similarly compromised. At present, we can only identify a small number of 'piecemeal' opportunities to deliver new employment premises for the town.

As with the consideration of housing, the NPPF allows for employment to be considered at market-area level. We anticipate carrying out further work to define and agree a Functional Economic Market Area (FEMA) for Stevenage once detailed travel-to-work statistics have been released from the Census and will seek to work with appropriate authorities in doing so.

The Hertfordshire LEP has recently identified Stevenage as a priority location for investment and growth in its draft Strategic Economic Plan. However, in light of the above, there is a presently a degree of tension between what is needed, what we can deliver for ourselves and the emerging aspirations of the LEP.

It is clearly advantageous for all of our authorities to work together towards a sustainable solution to these issues. We anticipate continuing to work with you all in an effective, constructive and on-going basis as our respective strategies progress.

Yours sincerely



Richard Javes  
Planning Policy Manager  
Stevenage Borough Council

## Action 6: Email sent to Hertfordshire Highways

From:	Sanjay Patel <Sanjay.Patel@hertfordshire.gov.uk>	Sent: Thu 01/10/2015 16
To:	Caroline.Danby	
Cc:	Manjinder Sehmi	
Subject:	RE: Stevenage development sites	

**From:** Caroline.Danby  
**Sent:** 15 September 2015 17:26  
**To:** [Sanjay.Patel@hertfordshire.gov.uk](mailto:Sanjay.Patel@hertfordshire.gov.uk)  
**Subject:** Stevenage development sites

Hi Sanjay,

As you may be aware, we are moving towards producing a publication version of our Local Plan.

As such, we are hoping to get comments from the HCC, as Highway Authority, on the sites we are proposing to allocate for housing, employment and for Gypsy and Traveller provision. I have attached plans illustrating these sites:

- Housing – red outline; housing numbers are shown. Mixed use sites at Stevenage West and the Town Centre are highlighted – these will be predominantly housing, with employment provision included.
- Employment – blue outline.
- Gypsy and Traveller site – yellow outline.

Obviously we are already aware of issues relating to Bragbury End – the need for a new roundabout on A602 to serve both sites, and at Stevenage West – improved access at Meadway if we are to achieve over 1,350 dwellings. But we are keen to understand if there are any other significant issues.

The employment sites around Junction 8 are sites we are currently considering, it may be that not all will be allocated – so if you could consider these individually, as well as in terms of their cumulative impact that would be much appreciated.

If you could provide me with comments as soon as possible I would be very grateful, particularly in relation to the sites to the north of the Borough, as these are ones that I don't think we have discussed with you previously in any detail (end of September would be brilliant if at all possible). If all comments could be sent by end October that would be great.

Please let me know if you need anything further to enable site assessment.



Many thanks  
Caroline


Caroline Danby | Principal Planning Officer | Planning Policy | Stevenage Borough Council | Tel. 01438 242823


## Action 7: Meeting with Historic England – follow up advice

From:	Nigel Smith	Sent: Fri 04/09/2015
To:	Caroline.Danby	
Cc:	Richard.Javes	
Subject:	FW: Follow up to our meeting	

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 Message  GPA1 Local Plans.pdf (262 KB)

 site-allocations-local-plans-consultation-draft.pdf (93 KB)

 Consultants Brief Woodhead Road Heritage Appraisal (2).pdf (350 KB)

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**From:** Gilbert-Wooldridge, Tom [<mailto:Tom.Gilbert-Wooldridge@HistoricEngland.org.uk>]  
**Sent:** 04 September 2015 15:10  
**To:** Nigel Smith  
**Subject:** Follow up to our meeting

Dear Nigel

It was good to meet you and colleagues on Wednesday and very useful to discuss Local Plan sites and policies.

As promised, please find attached a few documents which I hope are of use.

The first is our good practice advice note on Local Plans, which is published on our website and sets out matters to be considered in relation to the historic environment. In terms of a 'positive strategy', it provides some general pointers, and I would also refer you to the comments we made on the 2013 consultation. In terms of good practice examples, it would be worth looking at the strategic historic environment policy and paragraphs in the Greater Nottingham Core Strategy, while the recently adopted East Cambs Local Plan provides a useful approach in terms of development management policies. There is no one-size fits all of course, but a positive strategy should be locally specific and underpinned by the evidence base.

The second attachment is our draft advice note on site allocations, which was subject to consultation over the summer and should be published on our website this autumn. It contains a methodology for assessing and selecting site allocations, which could be applied to sites within Stevenage, particularly for the North of Stevenage site (but also the town centre and Marymead sites).

The third and fourth attachments are examples of a heritage impact assessment carried out for a Local Plan in Derbyshire, where the inspector had concerns regarding the impact of housing allocations on a conservation area. I've attached the consultants brief and the final assessment. As discussed at the meeting, we recommend such assessment is carried out for the North of Stevenage site.



Hope all of this is of use. I'd be happy to discuss further if needed and advise on any assessment work.

Many thanks

Tom




## Action 7: HIA consultation with Historic England

From:	Caroline.Danby	Sent:	Tue 17/11/2015
To:	Gilbert-Wooldridge, Tom (Tom.Gilbert-Wooldridge@HistoricEngland.org.uk)		
Cc:			
Subject:	Heritage Assessments - site allocations		
<hr/>			
Message	 Heritage Impact Assessment - North Stevenage.docx (11 MB)		
	 Heritage Impact Assessment - Town Centre.docx (6 MB)		
<hr/>			
<p>Dear Tom,</p> <p>Following our discussions a couple of months ago, we have been working on producing Heritage Impact Assessments for all potential site allocations that lie within or adjacent to a conservation area.</p> <p>Please find attached the Assessments for North Stevenage and the town centre. I was hoping you might be able to have a quick look through these, to make sure they fulfil your requirements in terms of assessing the impacts of these sites. They follow the methodology set out in the draft Historic England advice note on site allocations.</p> <p>We are keen to ensure there are no concerns, which will lead to objections to the plan, before we go out to consultation at the beginning of January.</p> <p>Many thanks Caroline</p> <p>Caroline Danby   Principal Planning Officer   Planning Policy   Stevenage Borough Council   Tel. 01438 242823</p>			

## Appendix 2b – GYPSY AND TRAVELLER PROVISION

Action 2: Letter sent to the HCA

**Planning, Regeneration and Transport**  
Interim Head of Planning, Regeneration and Transport:  
**Paul Pinkney**



**Stevenage**  
BOROUGH COUNCIL

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Daneshill House, Danestrete, Stevenage, Herts SG1 1HN • Tel: 01438 242242 • Textphone: 01438 242555 • Fax: 01438 242566 • [stevenage.gov.uk](http://stevenage.gov.uk)

Michelle Osbourn  
Homes and Communities Agency

By email

Your Ref:  
Our Ref:  
Contact: Nigel Smith  
Direct Line: 01438 242752

E-mail:  
[nigel.smith@stevenage.gov.uk](mailto:nigel.smith@stevenage.gov.uk)

Date: 21 November 2014

Dear Michelle,

**Gypsy and Traveller site search**

As you will be aware, we are currently preparing a new Local Plan for the Borough.

As part of this process, we are responsible for determining how many Gypsy and Traveller pitches will be required. Where a requirement is identified, the Council should identify sites or broad locations where this provision will be made. This is the approach set out in Government guidance.

We have recently carried out a new accommodation assessment. This suggests that between 11 and 16 additional pitches will be required over the period to 2031. This study is available to view on the Council website, [www.stevenage.gov.uk](http://www.stevenage.gov.uk).

We are now searching for potential sites and areas where these pitches might be delivered. Because of the small, constrained nature of the Borough it is necessary for us to proactively identify and consider possible sites in and around Stevenage.

Our initial investigations suggest that the following site(s) in which you / your clients have an interest could be an appropriate location to provide new Gypsy and Traveller pitches in the future:

- Land west of Stevenage (south)
- Land west of North Road


Our appraisal of the suitability of this land for Gypsy and Traveller provision is attached for information.

I am writing to ask whether you would be willing to make your site(s) available, either in whole or in part, for this purpose.


You may wish to consider whether any provision could be made as part of any alternate proposals for this land previously submitted to the Council for



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Neighbourhood Renewal  
2000-2001  
Preventing Crime and Disorder



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consideration. I would like to make you aware that the Council may be able to secure funding to assist in the delivery of any new pitches.

I would be grateful if you could respond to me on this matter to inform our site assessment. If you wish to discuss this matter further, please do not hesitate to contact me using the details provided.

Yours sincerely,



Nigel Smith  
Principal Planner, Planning Policy

## Action 2: Response received from the HCA



Homes &  
Communities  
Agency

Nigel Smith  
Stevenage Borough Council  
Daneshill House  
Danestrete  
Stevenage  
Herts SG1 1HN

11 December 2014

Dear Nigel

### Re: Gypsy and Traveller site search

The Homes and Communities Agency (HCA) has reviewed your letter and appraisal documentation emailed to Michelle Osbourn dated 21 November 2014.

Provision of facilities for the Gypsy & Traveller community is a priority for the Government, as such we would agree in principle to making our land available for this provision, there are however wider considerations to take into account for the two sites in question and I would suggest a follow up meeting to discuss the options further.

#### Land west of Stevenage (south)

An extension to the Dyes Lane Gypsy and Traveller site could be supported in principle. The HCA is currently in discussion with SBC's estates team about bringing forward our land at West Stevenage as part of the wider West Stevenage residential development, the HCA would therefore want to further discuss the implications of any proposal for a new site on this land.

#### Land west of North Road


Gypsy and Traveller provision on this land could be supported in principle. The HCA has had previous discussions with SBC regarding this site and its potential for B8 industrial allocation, it is widely recognised that this site is constrained by the pylons and power lines present. The HCA would want to further discuss the options for this site with SBC.

Yours sincerely

Shelley Hall  
Area Manager Hertfordshire


### Action 3: Letter sent to neighbouring authorities

**Planning, Regeneration and Transport**  
Interim Head of Planning, Regeneration and Transport:  
Paul Pinkney





**Stevenage**  
BOROUGH COUNCIL

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**Andrew Marsh, Central Bedfordshire Council**  
**Claire Sime, East Hertfordshire District Council**  
**David Hill, North Hertfordshire District Council**  
**Sue Tiley, Welwyn Hatfield Borough Council**

**Your Ref:**   
**Our Ref:**   
**Contact:** Nigel Smith  
**Direct Line:** 01438 242752

**E-mail:**  
[nigel.smith@stevenage.gov.uk](mailto:nigel.smith@stevenage.gov.uk)

**Date:** 30 June 2015

**By email**

Dear colleagues,

**Local Plans / Gypsy and Traveller provision**

As you will be aware, we are presently developing a new Local Plan for Stevenage with the intention of reaching 'Publication' stage later in 2015. A key issue for our plan will be the identification of an appropriate target for Gypsy and Traveller pitch provision. Once this has been set, national guidance contains a clear expectation that the plan will identify appropriate sites or areas where this provision can be made.

David Couttie Associates conducted a Gypsy and Traveller Accommodation Study for Stevenage in 2013. This identified a requirement for three additional pitches by 2018 and a further 3-5 pitches in subsequent five-year periods. This study is available to view on our website<sup>1</sup>.

Over our proposed plan period to 2031, this results in a total requirement for between 11 and 16 pitches.


We have completed an initial site search to identify opportunities within the Borough where this requirement might be met. This exercise has identified two possible sites which are considered broadly 'suitable' and 'available'. However:

- One of these is not considered an appropriate location to accommodate all of our future requirements and has also been promoted as part of a larger housing scheme; while
- The other is still subject to a number of constraints when considered for Gypsy and Traveller provision and has also been promoted for other uses, including employment.


The site search concludes by setting out a series of 'next steps'. These include:

- Coming to a view on the broader balance of uses to be delivered through the local plan;


<sup>1</sup> <http://www.stevenage.gov.uk/planning/planning-policy/90175/90178/90191/>



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Neighbourhood Renewal  
2000-2001  
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- Determining the extent to which the sites identified will be genuinely available for Gypsy and Traveller use; and
- In the event of an anticipated shortfall:
  - Approaching other authorities under the Duty to Co-operate; and / or
  - Considering the advice in paragraph 14 of the NPPF and resolving whether it is appropriate to meet objectively assessed needs for Gypsy and Traveller provision; and / or
  - Revisiting the findings of the site search to determine if alternate steps might be taken to deliver additional pitches within the Borough boundary.

The first potential site is adjacent to our existing public Gypsy and Traveller site at Dyes Lane. Hertfordshire County Council (who own and manage the existing site) previously expressed an interest in extending the site by up to five additional pitches. This would allow an enlarged premises to be split into two separate sites of 10-12 pitches for management purposes.

Even if realised, this would still leave an outstanding pitch requirement, necessitating the identification of a new site

As you may already know, we have a notable shortfall in employment land within the Borough when compared against requirements suggested in our evidence base. We have conducted joint work with North Hertfordshire and Central Bedfordshire Councils in this regard.

The second of the two sites identified above presently represents the only opportunity within the Borough to make substantive new employment land provision and we are currently minded to use this site for this purpose.

Plainly, this would leave us with a shortfall of land / sites for Gypsy and Traveller provision regardless of whether or not the first site could be delivered.

Under the approach outlined above, I am therefore writing to you, as an adjacent or nearby authority on shared transport corridors, to see if you are aware of any sites or opportunities within your own administrative area which might be used to meet any shortfall in Gypsy and Traveller provision from Stevenage.

I'd be grateful if you could respond to this letter directly (i.e. separately to any response to our current public consultation). If you have any queries, or would like to discuss this issue in more detail, please contact me using the details provided.

Yours sincerely



Nigel Smith  
Principal Planning Officer

### Action 3: Response from NHDC

#### NORTH HERTFORDSHIRE DISTRICT COUNCIL

*Correspondence address:*

PO Box 480, Sale, M33 0DE

Telephone: (01462) 474000

Text Phone: (01462) 474800



9 July 2015

Our Ref: PL10

Your Ref:

Contact Officer: David Hill

Direct Line: 01462 474453

E-mail: [David.hill@north-herts.gov.uk](mailto:David.hill@north-herts.gov.uk)

Dear Nigel,

#### **Re: Local Plan / Gypsy and Traveller Provision**

Thank you for your letter dated 30 June 2015.

In North Hertfordshire we recently undertook a district-wide Gypsy and Traveller Accommodation Assessment (GTAA) to provide evidence in support of the Preferred Options Local Plan, which was consulted on in December 2014.

Based on growth generated within the district the GTAA identifies the need for 7 additional pitches up to 2031. This need is generated from the existing site at Codicote. Additional land in the form of allocation CD4 was identified in the Preferred Options document to meet this additional provision adjacent to the existing site, where a temporary permission has previously been granted.

Through the land allocations process other potential sites across the district have been considered. This was the result of the increased requirements from the now revoked East of England Plan Single Issue Review. In 2008 NHDC consulted on six sites across the district adjoining existing rural settlements as part of the Land Allocations Issues and Options Consultation (January 2008). These locations were formally rejected by Cabinet in June 2008, largely as a result of emerging policy in the Single Issue Review but also their deliverability as no sites were supported by the landowners; their poor location in terms of sustainability and also weight of response received to the consultation.

At the June 2008 Cabinet it was agreed that the focus for provision to meet the requirements of the East of England Single Issue Review would be met in the SNAP area, which was due to be taken out of the Green Belt under the provisions of the East of England Plan. As SNAP is no longer formally part of the Local Development Scheme and the RSS has been revoked this approach cannot now be considered appropriate or hold any weight.

In accordance with Planning Policy for Travellers Sites (2012) and based on the most up to date evidence from the GTAA (2014) the Council is meeting local need through

## NORTH HERTFORDSHIRE DISTRICT COUNCIL

*Correspondence address:*

PO Box 480, Sale, M33 0DE

Telephone: (01462) 474000

Text Phone: (01462) 474800



expansion of the existing site. This is considered to be the most sustainable option (as informed by SA/SEA) and as such, no additional sites have been identified as currently being suitable. Therefore, unfortunately we are unable to offer any additional sites/pitches to help meet your provision.

Yours sincerely

David Hill  
Senior Planning Officer  
Strategic Planning and Enterprise

### Action 3: Response from Central Beds.

**From:** Andrew Marsh <Andrew.Marsh@centralbedfordshire.gov.uk>  
**Sent:** 08 July 2015 16:41  
**To:** Nigel Smith  
**Subject:** Local Plans / Gypsy and Traveller provision

Dear Nigel

#### Local Plans / Gypsy and Traveller provision

Thank you for consulting Central Bedfordshire Council on your Local Plans / Gypsy and Traveller provision.

At the time of writing there are a total 261 authorised Gypsy and Traveller pitches in Central Bedfordshire. However the needs assessment undertaken to inform the Gypsy and Traveller Plan identified a shortfall of approximately 157 plots, there is therefore a significant need arising in our own area. In June 2014 Central Bedfordshire Council submitted its Gypsy and Traveller Plan, which included a proposed allocation of sites to deliver this pitch requirement. Unfortunately the Plan was withdrawn in August 2014 following consideration of issues and matters raised by the Planning Inspectorate. Whilst the Council's Plan-Making Programme (February 2015) has established a programme for preparing a new Gypsy and Traveller Plan, adoption is not anticipated until February 2018. Given that there is a substantial unmet need in Central Bedfordshire which we do not yet have sites allocated for, we are unable to assist in meeting any shortfall in Gypsy and Traveller provision from Stevenage.

We appreciate that this is a DtC matter and will be looking at how our needs are met through future dialogue with yourselves.

Kind regards

**Andrew Marsh MRTPI**  
Acting Senior Planning Officer  
Strategic Planning and Housing Team  
Regeneration and Business Directorate

**Central Bedfordshire Council** Priory House, Monks Walk, Chicksands, Shefford, SG17 5TQ, Direct dial: 0300 300 6624 | Internal: 76624 | Email: [andrew.marsh@centralbedfordshire.gov.uk](mailto:andrew.marsh@centralbedfordshire.gov.uk)



### Action 3: Response from EHDC



East Herts Council  
Wallfields, Pegs Lane  
Hertford, Herts  
SG13 8EQ  
Tel: 01279 655261

Nigel Smith  
Principal Planning Officer  
Stevenage Borough Council  
Daneshill House  
Daneshill  
Stevenage  
SG1 1HN

Your contact: Kay Mead  
Direct Dial: 01992 531625  
Fax:  
Our Ref:  
Date: 09 July 2015

Dear Nigel,

**Re: Local Plans/Gypsy and Traveller provision**

Thank you for your email and attached letter dated 30<sup>th</sup> June in respect of your wish to understand whether East Herts Council would be "aware of any sites or opportunities within your own administrative area which might be used to meet any shortfall in Gypsy and Traveller provision from Stevenage".

Due to significant constraints in the district, East Herts Council is itself experiencing particular difficulties in trying to identify sites to meet its own identified needs for both Gypsies and Travellers and Travelling Showpeople at this time. In this respect, the following link to a report to the Council's District Planning Executive Panel on 22<sup>nd</sup> October 2014, that considered the Identification of Potential Sites Study, which was undertaken by consultants to help progress this matter, explains the situation more fully:

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2581&Ver=4>

While the Joint Member/Officer Working Group, which was proposed in the recommendations to that report, has been established and work is on-going to progress potential solutions around how the Council can meet its requirements through its very limited options, it has yet to conclude where the identification of potential sites will occur or, indeed, if the Council will even be able to meet its own need at this stage.

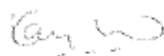
Future recommendations of the Working Group in respect of potential locations to meet the identified need will be brought forward through the District Plan process via the District Planning Executive Panel's consideration of, currently draft, Policy HOU7 'Gypsies and Travellers and Travelling Showpeople', in due course, but this is unlikely to take place for some months.





You will therefore appreciate that this Council is not in a position to offer any assistance in helping to meet Stevenage Borough Council's identified need at this stage.

Yours sincerely,



Kay Mead (Mrs),  
Principal Planning Officer, Planning Policy

#### Action 4: SBC notes from EHDC/SBC meeting relating to G&T provision

##### Meeting with EHDC to discuss Gypsy and Traveller provision Thursday 13 August 2015 @ Wallfields

###### Attendees:

Jenny Pierce (EHDC)  
Kay Mead (EHDC)  
Richard Jayes (SBC)  
Caroline Danby (SBC)

###### Discussion:

- EHDC last G&T needs assessment identified requirement for:
  - 7 travelling show people sites. 1 to be provided in first 5 years.
  - 12 G&T sites. 7 to be provided in first 5 years.
- EHDC are currently updating their needs assessment – due to start tender process in 3 weeks. This is likely to reduce numbers as some previous need (6 G&T plots) arose from unauthorised pitches, which have now gone.
- Current site is Rye House. Looking to relocate some of this provision – overcrowded.
- Gresley Way is the preferred location for identified travelling show people need:
  - It can be brought forward in the first 5 years
  - Close to good transport links for equipment/lorries etc.
  - However, not consulted with the travelling show people community yet to gauge their thoughts on this site.
- SBC requested that if G&T provision is going on this site, EHDC should also meet our needs, to avoid multiple separate sites around the edge of Stevenage.
- EHDC were not keen on this proposal for a number of reasons:
  - Travelling show people and G&T's not to be located together.
  - EHDC are looking for a site for private provision, not public provision.
  - EHDC needs may not go down and they may need to provide their G&T provision on this site as well as the show people provision.
  - No site should accommodate over 15 plots.
- Jenny to contact Pigeon to get an update and to confirm whether they are seriously considering G&T provision on their site/other land they own.
- **SBC to write to EHDC to formally ask for them to consider G&T provision on Pigeon site.**
- EHDC mentioned Hertford Town Centre consultation – due to go out in September.  
**Note – highlight this to Paul Pinkney]**

#### Action 4: Email sent to EHDC

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**From:** Richard.Javes  
**Sent:** 27 August 2015 14:45  
**To:** Kay.Mead@eastherts.gov.uk; jenny.pierce@eastherts.gov.uk  
**Cc:** Caroline.Danby  
**Subject:** Gypsy and Traveller provision  
**Importance:** High

Dear Kay and Jenny,

Thank you for agreeing to meet with Caroline and me on 13 August to discuss Gypsy and Traveller provision as a part of the current Pigeon proposals to the east of Gresley Way.

I note that Kay stated in her 9 July response to us on Gypsy and Traveller provision that there was a question mark about whether East Herts Council "...will even be able to meet its own need at this stage". The letter ended with the statement that "...this Council is not in a position to offer any assistance to meet Stevenage Borough Council's identified need at this stage". Kay reiterated those points at our meeting on 13 August.

Of course, since that 9 July letter, the opportunity to include Gypsy and Traveller provision as a part of the Pigeon proposals has arisen: this provides the context in which your stance should be re-visited.

The Borough Council's position in making new Gypsy and Traveller provision is, as you will be well aware, heavily compromised. Spatially, Stevenage is the second smallest Authority in the East of England region, heavily urbanised and, for the most part, tightly bounded by Green Belt. We already have a G&T site of 17 pitches – which is considered the maximum that can be readily accommodated. We have a high housing target to meet, which will necessitate the use of extensive areas of greenfield land and the rolling back of the inner Green Belt boundary.

The opportunities that are open to us to make further Gypsy and Traveller provision for the lifetime of the emerging Stevenage Borough Local Plan (viz, to 2031) are extremely limited and difficult to deliver.

The Borough Council is not presently seeking that this site, tight on the eastern edge of Stevenage, should make a contribution towards meeting the Borough's housing target nor are we currently opposing these proposals (although they have not been discussed with our Members, at your request). We ask that you consider seeking some joint Gypsy and Traveller provision as a part of the over-arching development.

*Richard Javes*

Richard Javes BA(Hons) MRTPI  
Planning & Transport Policy Manager

## Appendix 2c – EMPLOYMENT

Action1: Early stage targeted consultation

See evidence under Housing Action 1 (pages xx to xx)

Action 2: Letter to Letter sent to HMA authorities – seeking help with housing needs

See evidence under Housing Action 2 (pages xx to xx)

Action 5: Consultation with Hertfordshire Highways

See evidence under Housing Action 6 (pages xx to xx)

Action 6: Letter from the HCA



Homes &  
Communities  
Agency

Richard Javes  
Stevenage Borough Council,  
Daneshill House,  
Danestrete,  
Stevenage,  
Herts  
SG1 1HN

12 July 2016

Dear Richard

**Stevenage Borough Local Plan: Publication Consultation**

Further to the Homes and Communities Agency's response dated 8 February 2016, and our subsequent email correspondence, I write in respect of 'Land at North Road' and update the HCA comments accordingly as set out in the table below.

HCA Asset	Local Plan Policy	HCA Comments
Land at North Road	EC1: Allocated Sites for Employment Development	The HCA supports the allocation for employment use at this site.

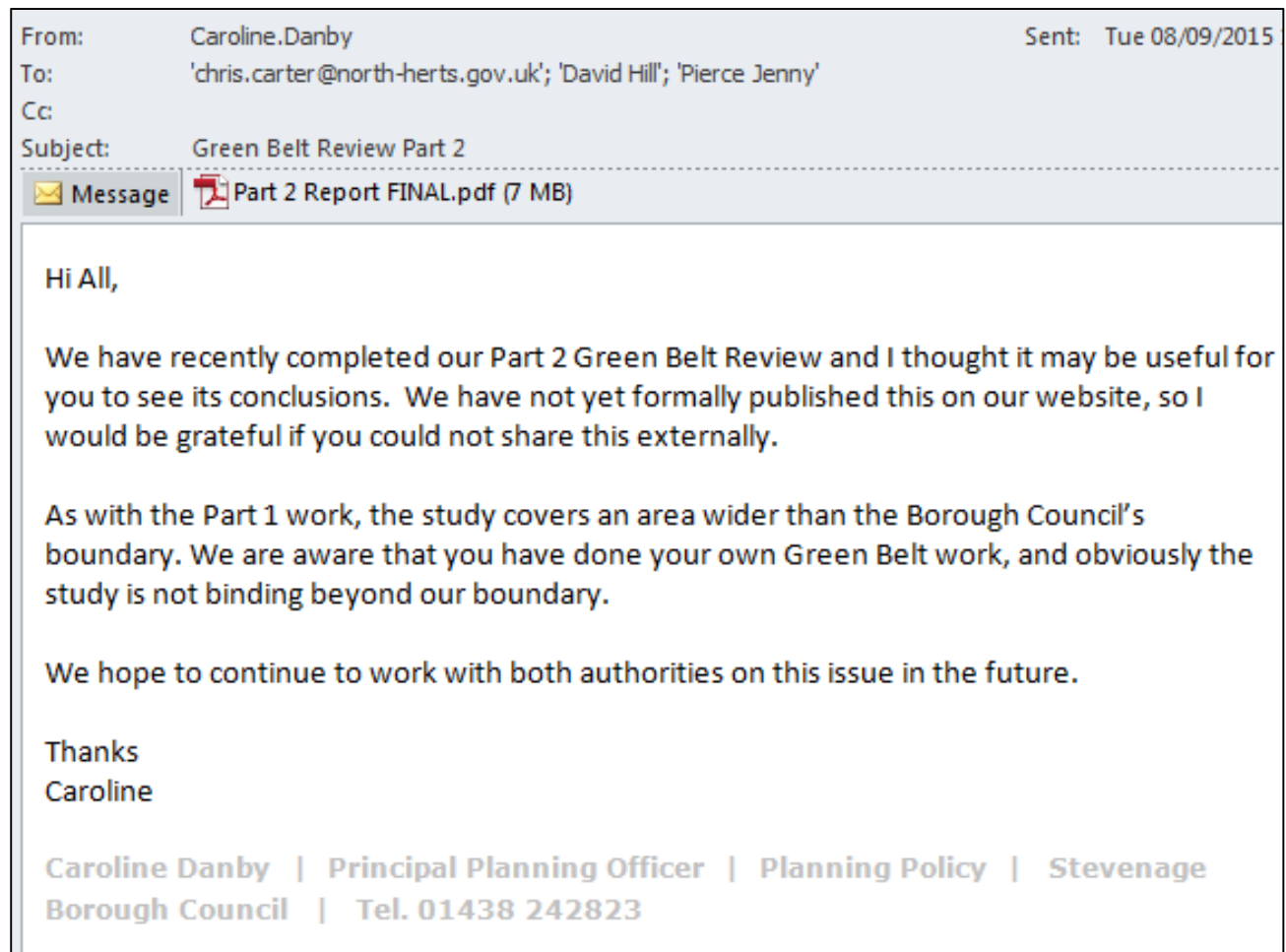
Yours sincerely



Shelley Hall  
Area Manager, Hertfordshire  
East and South East

## Appendix 2d – GREEN BELT

### Action 1: Results of Green Belt Review shared with EHDC and NHDC



## Appendix 2e – RETAIL

Action 1: Report to Executive (first page only) recommending the formation of the Stevenage First partnership



Part 1 –  
Release to Press

**Meeting: EXECUTIVE**

**Agenda Item:**

**6**

**Portfolio Area:** Environment and Regeneration

**Date:** 17 JUNE 2014

### **TOWN CENTRE REGENERATION**

#### **NON-KEY DECISION**

Authors – Richard Javes Ext. 2962 / Richard Crutchley Ext. 2255

Lead Officer – Paul Pinkney Ext. 2257

Contact Officer – Richard Javes Ext. 2962

#### **1 PURPOSE**

- 1.1 To set out the opportunities to regenerate the town centre, stimulate growth and attract inward investment.
- 1.2 To propose the establishment of a town centre 'task force' that will provide a governance structure to promote and deliver regeneration.
- 1.3 To propose how the 'task force' will initially operate and which organisations are key to promoting regeneration and inward investment in the town centre.

#### **2 RECOMMENDATIONS**

- 2.1 That a 'task force' be established to co-ordinate and deliver town centre regeneration through a public-private partnership chaired by the Borough Council;
- 2.2 That the 'task force' be established as the delivery mechanism for regeneration and be chaired by the Borough Council. The an initial membership will include Members and officers from: Stevenage Borough Council, Hertfordshire County Council, the Hertfordshire Local Enterprise Partnership (LEP), the Hertfordshire Chamber of Commerce, Stevenage Town Centre Management Company and the Highways Agency;
- 2.3 That the 'task force' be supported by an officer team drawn from the Planning, Regeneration and Transport team and will be accountable to the task force;
- 2.4 That a Regeneration Framework be developed to provide a basis for: (a) co-ordinating private and public sector-led initiatives; (b) identifying infrastructure requirements and the programmes necessary to deliver them; and (c)



Action 1: Report to Executive recommending the approval of the Stevenage Central Framework



Part 1 – Release  
To Press

Meeting: SPECIAL EXECUTIVE  
Portfolio Area: Regeneration and Environment

Agenda Item:

**2**

Date: 24 JULY 2015

## **TOWN CENTRE REGENERATION: TOWN CENTRE FRAMEWORK**

### **KEY DECISION**

Author – Paul Pinkney Ext No. 2257  
Lead Officer – Paul Pinkney Ext No. 2257  
Contact Officer – Paul Pinkney Ext No. 2257

### **1. PURPOSE**

- 1.1 To update the Executive on the ongoing work to develop a Framework to attract inward investment, development and opportunities to regenerate the town centre of Stevenage.
- 1.2 To present the Stevenage Central Framework, developed by David Lock Associates in partnership with Stevenage Borough Council and the Stevenage First Board.
- 1.3 To establish the Stevenage Central Framework as the basis for Regeneration and Asset Management strategies and policies.

### **2. RECOMMENDATIONS**

- 2.1 That the Stevenage Central Framework: which has been developed by David Lock Associates in partnership with this Council and the Stevenage First Board be noted.
- 2.2 That the Stevenage Central Framework be adopted as the basis for the development of planning policy.
- 2.3 That the Framework be adopted as a blueprint for the regeneration of the town centre and the wider central area, as identified spatially in the Framework .
- 2.4 That officers be instructed to update the Strategic Asset Management Plan to support the regeneration of Stevenage Central, as established in the Framework.

## Appendix 2f: INFRASTRUCTURE AND TRANSPORT

### Action 4: Publication of SMART Motorway scheme.

#### **A1(M) near Stevenage to be 'widened'**

01/12/2014

A notoriously congested stretch of the A1(M) is to be 'widened' as part of a £1.5 billion package of roads improvements in the East of England, the Government announced today.

The work will tackle the bottleneck around Stevenage by upgrading the stretch between Junction 6 (Welwyn north) to Junction 8 (Hitchin) to a smart motorway, including widening the two-lane section to three lanes by allowing hard shoulder running.

In addition as part of the Autumn Statement on 3 December the Department for Transport (DfT) announced it will carry out an A1 East of England Feasibility Study. This will look into how the safety and performance of the A1 between Peterborough and the M25 can be improved, including the possibility of upgrading the old dual carriageway section to motorway standard.

Hertfordshire Local Enterprise Partnership (LEP), which has lobbied hard for improvements as part of the A1 (M) Consortium, an alliance of local businesses and political representatives, welcomed the news.

Andrew Percival, Consortium representative and board member of Hertfordshire Local Enterprise Partnership, said: "We are delighted the Government recognises that investing in future improvement to relieve severe and long-standing congestion on the A1(M) is key to the future of Hertfordshire and the region's economy.

"Unlocking the bottleneck will significantly improve life for commuters and encourage future economic growth in the county.

"The LEP, MPs, businesses and local authorities have pressed hard for increased capacity on this key strategic route and we will continue to monitor progress to improve Hertfordshire's road network."

The A1(M) is just one of over 84 new schemes to have secured funding as part of the Department for Transport's £15 billion Road Investment Strategy over the next six years, with £1.5 billion of that total to be invested in the East of England.

Chancellor of the Exchequer, George Osborne, said: "I promised when I was in the east of England that we would address this area's economic needs for the future.

"Our Long term-economic plan means today we can invest £1.5 billion into the region's infrastructure to improve, repair and expand our roads."

Hertfordshire MPs, including Sir Oliver Heald who recently secured an Adjournment Debate on roads in Hertfordshire and the widening of the A1(M), have long campaigned for the road to be widened.

Sir Oliver told the House on 21 November that Hertfordshire Local Enterprise Partnership believes that increased capacity on the A1(M) is the "No. 1 priority for the county's road network for the next six years".

And in June, in an open letter to Secretary of State for Transport Patrick McLoughlin MP, Hertfordshire's business community in a campaign led by the A1(M) Consortium called upon the Government to address congestion on the A1(M). Signatories included GSK, Elstree Studios, the University of Hertfordshire, Rexel UK and Morrison Utility Services.

## Appendix 2g: HEALTHY COMMUNITIES

### Action 1: Example of minutes from HCC/SBC education meetings

**Education / Planning meeting**  
**Stevenage Borough Council (SBC) / Hertfordshire County Council (HCC)**  
**11 July 2014**  
**SBC Offices**

Kate Ma – Hertfordshire County Council (KM)  
Dick Bowler – Hertfordshire County Council (DM)  
Bob Chapman – Hertfordshire County Council (BC)  
Peter Oddy – Hertfordshire County Council (PO)  
Nigel Smith – Stevenage Borough Council (NS)

- NS provided an update on the plan-making situation at SBC:
  - 1<sup>st</sup> consultation on new local plan held during Summer 2013, setting a preferred target of 5,300 homes.
  - Consultation on a full draft local plan at the start of 2014 was postponed due to a number of issues including the consultation responses, outcomes of other examinations, new data releases.
  - A revised Local Development Scheme is being taken to July Executive. This proposes consultation on revised housing numbers in the first half of 2015 with a full draft plan in October 2015.
  - Allowing for lead-ins etc, this effectively means 12 months to resolve issues and identify solutions.
  - New population projections have been released by ONS. These are significantly higher than figures used to date in Local Plan. Anticipating revised household projections to show requirement for >7,000 homes 2011-2031.
  - ONS figures suggest an additional 1,300 primary-aged and 1,100 secondary-aged children by 2031.
  - These figures are the 'starting point' for SBC's plan and will inform housing target.
  - A new Land Availability study (SLAA) is being finalised. There has been an upturn in interest in last 12 months, particularly in and around the town centre.
  - Overall supply is anticipated to rise to somewhere close to new household projections but there may be a small surplus / shortfall when figures are finalised.
  - Reliance on significant flatted developments in the town centre has particular implications for education provision.
  - KM questioned status of Stevenage West. HCC preference would be for a single cross-border scheme as this would trigger requirement for on-site Secondary School provision. NS explained this was unlikely.
  - Other issues around capacity on the A1(M) and levels of housing delivery required to meet anticipated new figures.
- KM provided update on education provision
  - 5 permanent new forms of entry (f.e.) have been provided or are planned in Stevenage at primary level ~ Martins Wood, Letchmore, Fairlands, Giles (complete) and Roebuck (planned for September 2015).



- Based on current information, primary capacity is “tight” but no further permanent expansions planned for next five years. No budget to maintain 5-10% surplus places as in the past so provision is at its limits. Temporary expansions will be used for unforeseen short-term demand.
    - This is based on actual children living in the town (i.e. birth registrations)
    - New homes will require new capacity to be provided.
  - Current surplus of secondary school places. But these are anticipated to be at capacity in 2019/20 with a requirement for 6f.e. arising thereafter.
  - This is based on SBC's 5,300 homes proposal as well as an allowance for some development around the town in North Hertfordshire.
- NS questioned how HCC operates its statutory responsibilities against assumption that new schools should be free schools / academies.
  - DB clarified that, in s106 situations (i.e. planning applications), HCC require the provision of a site and (funding for) buildings from the applicant and will then invite a 'proposer' to express an interest in running the school.
  - Experience across the County to date is that developers are happy with this approach. No experience, for example, of developers teaming up with Academy chain directly and 'bypassing' HCC – though this could theoretically happen.
  - KM advised that DfE have released new space standards. HCC are reviewing their own standards in turn.
  - In terms of allocating new sites through local plans, HCC advised they would initially seek a site towards the top end of the standard (presently 2.5 hectares for Primary) but smaller sites / innovative solutions are possible ~ see two-storey Howe Dell School, Hatfield as an example.
  - Demand arising from town centre identified as key issue for future. Standard HCC assumption is that 500 dwellings creates requirement for 1f.e. but this varies depending on unit size / tenure
    - Smaller units and / or lower affordable housing requirements would reduce yield. HCC could run some 'theoretical' yields if SBC provide some options.
  - No immediately obvious site for 'full standard' provision in or adjacent to town centre.
  - Future options for primary provision were discussed:
    - Some potential for further capacity from existing sites:
      - Camps Hill – dependent on relocation of Education Support Centre (ESC) [see comments on secondary schools below] – 1f.e.
      - Trotts Hill – dependent on relocation of care home – 1f.e.
      - The Leys – 0.5f.e.
    - Potential for alternate solutions were discussed – including making provision away from town centre to cater for 'footloose' demand and free-up capacity at nearer schools (e.g. Fairlands)
      - Almond Hill – potential interest in providing 2f.e. of infant provision and expanding existing junior school to 5f.e to continue taking pupils moving up from Letchmore.
      - Thomas Alleyne – unused detached playing fields north of Martins Way could be used for 2f.e. primary to create an 'all through' school
      - 'Disaggregating' primary schools into infants and juniors could theoretically make more efficient use of sites [Infant schools do not require playing fields so can operate from smaller sites] though significant

operational concerns over split sites and operational preference for Primary rather than Infant / Junior schools

- HCC willing in principle to explore these issues / options further.
- SBC to provide details of (potential) development sites once these have been firmed up to enable more accurate forecasting.
- Issues around secondary provision were discussed:
  - BC explained forthcoming report to Cabinet Panel. HCC to pursue CPO to establish ownership of Barnwell East / Ashtree sites.
  - Barnwell East to be vacated. Options to keep building in use being explored. DB explained that 'third party' tenants will not be sought due to potential difficulties in regaining possession if building is brought back into educational use.
    - Relocation of ESC from Camps Hill into southern 'wing' being explored.
    - Will look for short-term 'guardians' and then consider whether any HCC services can be provided from this location to provide security.
    - School to be retained for future provision. 6f.e. at present but potential to expand if needed.
  - Uncertainty around NHDC proposals. Secondary school place modelling includes an allowance for some development here.




#### Outcomes / actions

- SBC to provide (range of) indicative parameters for town centre development ~ units nos / affordable housing levels ~ for HCC to provide indicative pupil yields
- SBC to advise HCC of updated schedule of (potential) development sites once SLAA finalised to inform updated pupil forecasts
- Results of these to be used to identify schools requirements for the Local Plan
- HCC to give on-going consideration to options for future provision
- Further meeting to progress these issues in Autumn 2014.

## Action 2: Email confirming Sport England support for Sports Strategy

From:	Roy Warren <Roy.Warren@sportengland.org>	Sent: Fri 14/11/2014 1
To:	Caroline.Danby; sue@nortoft.co.uk; chris@nortoft.co.uk	
Cc:		
Subject:	Stevenage Sports Facility Strategy/PPS- Revised Draft	

---

 Message  20141114 Revised Sports Facility Assessment SE comments.doc (354 KB)  
 20141114 Revised PPS SE comments.doc (372 KB)

Caroline/Sue/Chris

Thanks for sending me the revised sports facility strategy and playing pitch strategy documents . I broadly welcome the changes that have been made to the documents in response to our comments and now consider the strategies to be broadly sound and in accordance with our guidance subject to the NGBs not raising any significant issues.

My comments are in two separate attachments on the SFS and PPS to follow the format of my comments on the first draft but I acknowledge that the documents will now be combined. Most of the comments relate to the site specific proposals for pitches as this was not in the draft.

As I have focused on the changes made in response to the matters that I commented on at the draft stage I will may not have picked up any significant changes made in response to comments made by other consultees. If there are any such significant changes that have been made that you would like me to consider and comment on I would be grateful if you could signpost me to them as I have not read the revised documents in their entirety.

Please note my comments about the need for action plan(s) to be prepared to complete the strategies.

I would be happy to discuss the comments or answer any queries that you may have.

Regards

Roy

**Roy Warren**  
Planning Manager  
T: 020 7273 1831  
M: 07769 741 137  
F: 01234 359 046  
E: [Roy.Warren@sportengland.org](mailto:Roy.Warren@sportengland.org)  
**Sport England's London office has moved to 1st Floor, 21 Bloomsbury Street, London, WC1B 3HF**

## Planning and Engineering

Head of Planning and Engineering: Zayd Al-Jawad

Mr Nick Carver  
Chief Executive  
East and North Hertfordshire NHS Trust  
Lister Hospital  
Coreys Mill Lane  
Stevenage  
SG1 4AB

Your Ref: [REDACTED]  
Our Ref: [REDACTED]  
Contact: Caroline Danby  
Direct Line: 01438 242823  
Fax: 01438 242566  
E-mail: [caroline.danby@stevenage.gov.uk](mailto:caroline.danby@stevenage.gov.uk)

Date: Friday 28 August  
2015

Dear Mr Carver

### **Lister Hospital - future requirements**

In producing the last iteration of our Local Plan for the Borough, the Council worked closely with the East and North Hertfordshire NHS Trust to understand the future requirements of the Lister Hospital and how these could be facilitated by the local plan-making process. This was prior to the recent package of changes to hospital services across the region, completed in 2014.

We are now working on a new Local Plan once again, and are moving towards identifying specific sites for (re)development in the near future. The Local Plan will cover the period up to 2031.

As such, we need to ascertain whether the Lister Hospital has any plans in place to expand its services further in the future.

If a site allocation is required to support these plans, we must ask for clear evidence demonstrating the following:

- o Projections of future service needs based upon demographic change, including the planned growth of the town;
- o Any demand for additional key worker housing or the need to replace existing units;
- o The land or floorspace requirements of any future expansion;
- o Where this need will be met;
- o If land acquisition is required, what steps have been taken and/or are planned to acquire such land;
- o Any indicative timescales for delivery.

Given the competition for alternative land uses, it is important that any future allocation is as 'robust' as possible. We cannot allocate a site on the basis that additional space might be required; a clear justification and firm plans will need to be provided.

The Borough Council recognises the importance of the Lister Hospital to Stevenage. In terms of both the services it provides to the community and its status as one of the largest employers in the town.

We look forward to continuing to work with you to help deliver your long-term aspirations for this site.

Yours sincerely

Richard ~~Javes~~

Planning and Transport Policy Manager  
Stevenage Borough Council




## Appendix 2h: Climate change, Flooding and Pollution

Actions 2 & 3: Level 1 & 2 SFRA formal approval from the EA

creating a better place

Deborah Horner  
Stevenage Borough Council  
Planning Policy  
Daneshill House  
Stevenage  
Hertfordshire  
SG1 1HN



**Environment  
Agency**

**Our ref:**  
NE/2016/124594/SF-01/PO1-L01

**Date:** 3 June 2016

Dear Deborah

**Strategic Flood Risk Assessment (SFRA) level 1 & 2**

We have now had an opportunity to review the draft level 1 and level 2 Strategic Flood risk assessments and are happy with the documents.

We do have the following comments which you should be aware of;

**Stevenage SFRA Level 1**

**North West Stevenage Hydraulic Model**

We haven't seen the outputs of the 2D hydraulic model for Ash Brook, but we do agree with the comments which are suggested in this section. It would likely be a benefit to a future developer in this area to undertake more detailed modelling to identify the flood risk to site, particularly in extreme events or blockages of the culverts. This modelling should also identify the downstream impacts which the proposed development in the area taking place and inform the Flood Risk Assessment. We do not have any data to provide for this area.

**Stevenage SFRA Level 1 & 2**

The SFRA only considers the climate change allowances for the Thames River Basin whereas the northern part of Stevenage falls within the Anglian River Basin. As the Thames allowances are more conservative, we are happy with this approach, however there is no mention in the SFRA as to the reasoning why the Anglian allowances are not being used. At an application stage we would accept the lower allowances for developments that fall within these areas unless it was stated that Stevenage BC was only using the Thames River Basin allowances.


I hope you find this useful. If you have any queries please feel free to contact me.

Yours sincerely

**Mr Kai Mitchell**  
**Sustainable Places Planning Advisor**

Tel: 0203 0259074  
E-mail [SPHatfield@environment-agency.gov.uk](mailto:SPHatfield@environment-agency.gov.uk)

Environment Agency  
Apollo Court, 2 Bishops Sq Business park, Hatfield, Herts, AL10 9EX.



## Appendix 2i: The Natural Environment

### Action 4: LNP email to confirm approach to Duty to Co-operate

From:

Coulson Julia <Julia.Coulson@eastherts.gov.uk>

Sent:

Tue 26/01/2016 13

To:


Caroline.Danby


Cc:

Tom Day (Tom.Day@hmvw.org)

Subject:

RE: Local Plan consultation

 Message

 LNPs guiding principles for LPAs final paper 20 02 14.pdf (300 KB)

Hi Caroline,

Thank you for your email. The Herts Local Nature Partnership produced a set of guiding principles around planning and the natural environment. I've attached a copy for your information. To prove compliance under the Duty to Cooperate, we ask that the authorities write a short summary (1 or 2 pages) outlining how they have taken the guiding principles into account within their local plan. This is reviewed by the Board, which meets quarterly.

Just for your information, I'm the current LNP Coordinator but I'm leaving the role on the 19<sup>th</sup> Feb. We're not yet sure when a replacement will be in post so any enquiries after the 19<sup>th</sup> should be sent to Tom Day (cc'd in).

Kind regards,

Julia

Julia Coulson  
**Hertfordshire Sustainability Forum & Local Nature Partnership Coordinator**

Direct Dial: 01992 531 620  
Switchboard: 01279 655 261  
East Herts Council  
Wallfields  
Pegs Lane  
Hertford  
SG13 8EQ



Mr Richard Javes  
Planning and Transport Manager  
Stevenage Borough Council  
Daneshill House  
Danestrete  
Stevenage  
SG1 1HN

Post Point CHN 215  
Hertfordshire County Council  
County Hall, Pegs Lane  
HERTFORD SG13 8DN

Contact Rachael Donovan  
Tel 01992 556294  
My ref SBC/LNP guiding principles  
rachael.donovan@hertfordshire.gov.uk

Date: 7<sup>th</sup> June 2016

Dear Richard,

**RE. STEVENAGE BOROUGH LOCAL PLAN – STATEMENT OF ACCORDANCE  
WITH THE HERTFORDSHIRE LNP'S GUIDING PRINCIPLES**

Thank you for providing the Hertfordshire LNP with your Statement of Accordance, as part of the Duty to Cooperate; outlining how your Local Plan addresses the LNP's Guiding Principles for planning for biodiversity and the natural environment in Hertfordshire.

The Hertfordshire LNP welcomes the approach taken by your authority to reflect the principles within your Local Plan. Your Statement of Accordance has been assessed against the six guiding principles. Please find enclosed a review document which assesses each principle in turn stating whether the Local Plan is in accordance with the LNP principles, or whether the LNP considers some re-wording is required to better reflect the objectives of the principle.

In respect of all six guiding principles, the Hertfordshire LNP is pleased to confirm that the Stevenage Local Plan 2011-2031 accords with all six principles, at least in part, if not in full. Whilst delivery mechanisms may themselves change as circumstances change, at this stage we consider the Local Plan should provide a firm basis for delivery of biodiversity through the planning process within your Authority.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Andrews', written over a horizontal line.

Councillor David Andrews  
Chair of the Hertfordshire LNP



**Stevenage Borough Local Plan**

**Statement of accordance with LNP principles**

**July 2016**

**Principle 1: Recognise the value of the natural environment and the range of benefits and services it provides**

The provision of open spaces was an important part of the original new town structure. The Stevenage Borough Local Plan aims to ensure a network of multi-functional green spaces is retained throughout the town.

The network reflects one of the key objectives of Stevenage's Community Strategy 'to maintain the high quality spaces we have, and promote their use for a variety of activities'; and the findings of our Green Space Strategy, which recognises that green infrastructure performs a number of different functions, including providing ecological resources and processes. The Plan acknowledges the role of landscape design in its strategic policies and the contribution that this makes to the biodiversity value of the towns green infrastructure.

The Plan also acknowledges and reflects the importance placed on green infrastructure by the NPPF and NPPG, both as an essential contributor to healthy places and communities and as a way of combating the long term negative effects of climate change.

The Sustainability Appraisal acknowledges the wide range of social, environmental and economic benefits offered by open spaces and green infrastructure.

**Principle 2: Protect and enhance existing biodiversity assets**

Stevenage does not contain any European or nationally designated wildlife sites, such as SSSI's or NNR'S. However, there are a significant number of locally important sites. The Plan recognises that protecting and enhancing individual sites is important, but that it is also important to retain connections between these sites and other areas.

Policies are included to specifically protect, and enhance where possible, the following features:

- Principal Open Spaces (including parks, amenity greenspaces and woodlands)
- Wildlife Sites (as identified by the Hertfordshire Biological Records Centre)
- Green Corridors (including ancient lanes, structurally important routes and green corridors)
- Green Links
- Trees and Woodlands
- Unallocated open spaces
- Flood Storage Reservoirs and Functional Floodplain.

The mitigation hierarchy (avoid, mitigate, compensate) approach has been adopted in the Plan and where the release of sites with biodiversity interest is required to accommodate development needs, the Plan requires opportunities for biodiversity mitigation and compensation to be considered. Ecological assessments are a required element of major applications and are considered on a case by case basis for all other development sites in the Borough.

### **Principle 3: Seek opportunities to improve habitat connectivity**

The Plan protects networks of green spaces and local landscape features throughout the town by designating Green corridors (including ancient lanes and structurally important routes) and Green Links.

These links and corridors provide attractive and sustainable routes for people to move through, but also to enable the movement of wildlife and the diversification and sustenance of biodiversity. The Plan recognises that the protection and enhancement of these links is as important as protecting the individual spaces themselves in upholding the integrity of the new town as it was conceived.

Through the development and master planning of the 3 urban extensions proposed for Stevenage, the provision of new green spaces, and their connecting Green corridors and Green links will add to the network of green infrastructure that already exists in the Borough.

In line with the River Beane Catchment Management Plan, adopted to protect the Lea Catchment Nature Improvement Area (NIA), the Plan acknowledges the scarcity of water supply in the area and aims to improve water efficiency by setting a target to reduce water consumption for new developments to 110 litres per person per day (including external water use). The Plan also acknowledges the objectives of the WFD and how development can contribute to the delivery of these ecological improvements.

### **Principle 4: Integrate biodiversity opportunities within new development**

Policies within the Plan ensure that all new residential development will include on-site open space provision (where possible), in accordance with the standards and thresholds set out in our Green Space Strategy. It aims to ensure new spaces are usable and coherent and of an appropriate size. Planting schedules for such sites would be undertaken on the advice of Natural England and the Environment Agency to ensure suitable planting and habitat provision is maintained through appropriate management.

On each of the three larger new neighbourhood's specific policy criteria require that schemes make provision for new ecological features through means of incorporating 'a network of green infrastructure', amongst other more specific requirements, such as retaining hedgerow boundaries or tree lines. The policies also require masterplans to be prepared for these sites, to be approved prior to the submission of detailed development proposals, including appropriate management of the site that is wildlife friendly – an approach that is already adopted in large parts of the town.

Where biodiversity features are included within or adjacent to development sites, policies require that these are protected.

**Principle 5: Make decisions informed by the best available ecological information and data**

The Local Plan is informed by a wide range of evidence studies and data, from various different sources.

Our recently updated Green Space Strategy provides an up-to-date assessment of green spaces across the town, the findings of which have been used to directly inform policies within the Local Plan.

The Plan also relies on data relating to Wildlife Sites, which is regularly updated by Hertfordshire Biological Records Centre. A comprehensive review of Wildlife Sites within the Borough was carried out in 2013 and has been used to identify those sites that are protected within the Plan.

The Plan also makes clear that any sites designated by Herts and Middlesex Wildlife Trust following adoption of the Plan will also be afforded the same level of protection, and the deletion of sites will also be taken into account.

**Principle 6: Secure the long term management of existing and new habitats and sites**

The Borough Council is working towards the implementation of a Community Infrastructure Levy (CIL), alongside the Stevenage Borough Local Plan. This will include contributions towards biodiversity and the maintenance and enhancement of Wildlife Sites.

As part of this work, and to ensure the Plan can be delivered, an Infrastructure Delivery Plan (IDP) has been produced. This identifies the additional level of green infrastructure likely to be required to provide for the increase in population, the costs likely to be associated with this, and how it might be funded. The Plan recognises the role of partnerships in the delivery of ecological improvements and the IDP identifies these partners.

The Plan includes a policy to ensure that new schemes have appropriate arrangements in place to ensure the long-term management of the open spaces they incorporate.



## Action 6: Letter received from NE confirmed approval of resolutions proposed

Date: 09 May 2016  
Our ref: 184990

Deborah Horner  
Planning Policy  
Stevenage Borough Council  
Daneshill House, Danestrete  
Stevenage  
SG1 1HN

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

By email: [deborah.homer@stevenage.gov.uk](mailto:deborah.homer@stevenage.gov.uk)

T 0300 060 3900

Dear Ms Horner

### **Planning consultation: Stevenage Local \_ Further Proposed Amendments and Updated Habitats Regulations Assessment (dated April 2016)**

Thank you for your email (dated 05 May 2016) and your letter (dated 15 April) regarding the above which we received on the 05 May 2016

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **1. Comments on the Local Plan**

Thank you for forwarding the proposed changes to the Local Plan which addresses Natural England's concerns identified in our formal consultation response (dated 17 February 2016) to the draft local plan. Natural England can confirm that we support the proposed changes as outlined in your letter dated 15<sup>th</sup> April 2016, the contents of which we also discussed at the very helpful meeting held at your offices on the 23 March 2016. In summary we support the following proposed changes:

- Rewording of paragraph 4.28 to include the protection and enhancement of the natural environment and landscape.
- Rewording Policy SP2 (Sustainable Development in Stevenage) to ensure bullet point 'n' also includes reference to "landscape".
- Rewording of bullet points e and f of Policy SP5 to ensure there is appropriate capacity for Rye Meads Sewage Treatment Works to serve new development. Rewording of bullet point f will ensure new development does not have an adverse effect on the Lee Valley SPA and development post 2026 will only be permitted if the required capacity is available at Rye Meads STW, including any associated sewer connections.
- Strengthening of Policy SP11 (Climate change, flooding and pollution) which now recognises *the role that the provision of greenspace can play in addressing climate change impacts*.
- Amendments to the wording of Policy SP12 (Green Infrastructure and the natural environment) which now identifies a strategic approach for the creation and enhancement of biodiversity and reflects the avoid mitigate and compensate hierarchy as required in para 118 of the NPPF. The proposed rewording distinguishes the different types of European, national and local designations (as required by para 113 of the NPPF). *The policy rewording also identifies measures for the protection and enhancement of priority habitats and species (as detailed in para 117 of the NPPF)*.
- Rewording of paras 5.150 and 5.151 to reflect the importance of the Chilterns AONB

Page 1 of 3



Natural England is accredited to the Cabinet Office Service Excellence Standard

- Inclusion of a flow chart in paragraph 5.145 to provide additional guidance to developers regarding biodiversity and landscape. Also use of the word "conservation" rather than "preservation".
- Changes to para 5.149 which now recognises: *Knebworth Woods SSSI*.
- Removal of the reference to the use of Grampian Conditions in paragraph 8.19
- Rewording of Policy HO2 (Stevenage West) which now requires a mitigation and monitoring strategy to be produced as well as confirmation that the proposal does not immediately abut Knebworth Woods SSSI.
- We support the proposal for the Sustainability Appraisal to contain more detailed information to clarify that BMV agricultural land is the only land available within the limitations of Stevenage's boundary where development can take place. We note the difficulties regarding the Natural England classification map being not sufficiently detailed to identify the subdivision of Grade 3. I will investigate whether there are more detailed maps available.
- Regarding Policy HO2, Natural England would support further assessment of the impact on Knebworth Woods SSSI in addition to the proposed masterplan, full archaeological assessment and full flood risk assessment.
- We support the proposal to identify any locally important wildlife sites in the relevant policies.
- We support the approach identified to address concerns relating to increasing the capacity of the A1

### 3. Habitats Regulations Assessment (HRA) – Updated Screening Report (April 2016)

Natural England recognises the efforts taken to update the HRA Screening Report in light of Natural England's comments in our letter dated 17<sup>th</sup> February 2016. There are a few minor amendments which in our view are still required. However, we are now in a position to agree with the conclusion of the HRA Screening Report of no likely significant effect. The proposed clarifications which in our view are required are as follows:

- Paragraph 1.4: It would be helpful to state that "*The screening opinion determines whether the local plan will have a likely significant effect, either alone or in-combination*". For clarity it would also be more accurate to say whether or not the Appropriate Assessment stage is required.
- Paragraph 1.15: The conclusion needs to clarify that there won't be any likely significant effects either alone or in combination.
- Paragraph 2.10: It is more accurate to say "*the Appropriate Assessment Stage*"
- Paragraph 5.7: Regarding the figures which estimate the percentage of the SPA which occurs in each county, our figures show that 17.97% in Essex, 39.77% in Greater London & 42.25% in Herts. The discrepancy may have arisen by using a map which predated "The Essex and Hertfordshire (County Boundaries) Order 1992", which moved the boundary westwards to follow the line of the Lee Navigation, thereby increasing the percentage within Essex.
- Paragraph 5.13 – The designation "*Ramsar*" should not be spelt in capital letters as it isn't an acronym (it is the name of the Iranian city where the convention was signed)
- Paragraph 8.39. As previously advised the SIP cannot be used for mitigating the impacts of recreational disturbance. If the conclusion is that there is no likely significant effect alone or in-combination then no further mitigation is required (other than the proposed policy rewording already identified in the HRA).

We look forward to receiving a copy of the Memorandum of Understanding to comment on and sign in due course.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Sarah Fraser on 02080261725. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely



Sarah Fraser  
Senior Planning Adviser – Essex, Herts, Beds, Cambs & Northants Area Team

## **BILATERAL MEMORANDUM OF UNDERSTANDING**

**BETWEEN**

**STEVENAGE BOROUGH COUNCIL (SBC)**

**AND**

**NATURAL ENGLAND (NE)**

**IN RESPECT OF**

**THE STEVENAGE BOROUGH LOCAL PLAN, SUBMISSION VERSION, JUNE 2016**

### **Summary**

- SBC and NE agree that Stevenage Borough's draft Local Plan is sound having worked together to find solutions for the issues that NE identified as being unsound.
- 1.1 We, the undersigned, set out in this memorandum those matters of joint interest to both the Authority and the Statutory Consultee as they are dealt with in the Stevenage Borough Local Plan (SBLP), Submission Version, June 2016 (hereinafter 'the plan') in accordance with paragraph 181 of the National Planning Policy Framework, March 2012 (hereinafter 'the NPPF').
- 1.2 This statement identifies, specifically, those areas upon which SBC and NE agree (marked in **bold**) and those areas of disagreement (marked in **text boxes**). Where the Authority and Statutory Consultee are in disagreement, potential routes to resolution are identified, where possible.
- 1.3 All matters where SBC and NE perceive that there is a joint or strategic interest are detailed in this memorandum. Matters which are not considered to be of joint or strategic interest are excluded. It may, therefore, be taken as read that the Authority and Statutory Consultee are content on those other matters.

### **Strategic Issues**

- 2.1 Paragraph 178 of the NPPF states that "*public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities...*"
- 2.2 Paragraph 156 states that the strategic priorities are strategic policies to deliver:
- *"the homes and jobs needed in the area;*
  - *the provision of retail, leisure and other commercial development;*
  - *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk...and the provision of minerals and energy (including heat);*



- *the provision of health, security, community and cultural infrastructure and other local facilities; and*
  - *climate change mitigation and adaption, conservation and enhancement of the natural and historic environment, including landscape."*
- 2.3 SBC and NE have had much correspondence over the past few months. A copy of our most recent correspondence is set out in Appendix A.
- 2.4 The Authority and the Statutory Consultee agree that, in their view, the plan has been prepared in accordance with:
- the Duty to Co-operate;
  - legal requirements;
  - procedural requirements; and
  - that it is sound.
- 2.5 In respect of the latter, the Authority and the Statutory Consultee agree that the plan has been:
- positively prepared;
  - is justified;
  - is effective; and
  - is consistent with national policy.

#### Preamble

- 3.1 Stevenage is tightly bounded by its administrative boundary and Green Belt. Its neighbour, to the north, east and south Stevenage is North Herts District Council. To the east, Stevenage is neighboured by East Herts District Council.
- 3.2 The SBLP sets out the allocation and delivery proposals for homes, jobs and infrastructure in Stevenage.
- 3.3 Areas of Green Belt surrounding Stevenage have national designation, such as SSSI.
- 3.4 Sewerage from Stevenage, including any new development allocated in the plan, discharges to Rye Meads STW which is located with the Lee Valley SPA (a European designation).
- 3.5 NE is the government's adviser for the natural environment in England, helping to protect England's nature and landscapes for people to enjoy and for the services they provide.
- 3.6 Within England NE is responsible for:
- helping land managers and farmers protect wildlife and landscapes;
  - advising on the protection of the marine environment in inshore waters (0 to 12 nautical miles);



- improving public access to the coastline;
- managing 140 National Nature Reserves and supporting National Trails;
- providing planning advice and wildlife licences through the planning system;
- managing programmes that help restore or recreate wildlife habitats;
- conserving and enhancing the landscape; and
- providing evidence to help make decisions affecting the natural environment.

3.7 SBC / NE have worked constructively, actively and on an ongoing basis to maximise the effectiveness of the plan and its supporting evidence contained within the Appropriate Assessment Screening document.

#### Detailed Memorandum

The detailed memorandum now follows, broadly in the order set out in paragraph 156 of the NPPF:

#### **Waste water**

- 4.1 SBC and NE **agree** that *Policy SP5 Infrastructure* should make reference to the capacity issue at Rye Meads STW post 2026. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.
- 4.2 SBC and NE **agree** that *para 8.19* should remove the reference to Grampian Conditions and simply state that developers should ensure that wastewater infrastructure can support development. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.

#### **Climate change mitigation and adaption**

- 5.1 SBC and NE **agree** that *Policy SP11 Climate change, flooding and pollution* should recognise the role that the provision of greenspace can play in addressing climate change impact. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.

#### **Natural environment and landscape**

- 6.1 SBC and NE **agree** that *para 4.28* should make reference to the protection and enhancement of the natural environment, as set out in para 156 of the NPPF. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.
- 6.2 SBC and NE **agree** that *Policy SP2 Sustainable Development in Stevenage* should include reference to the protection and improvement of landscape. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.

- 6.3 SBC and NE **agree** that *Policy SP12 Green Infrastructure and the natural environment* should identify a strategic approach for the creation and enhancement of biodiversity and green infrastructure, as set out in para 114 of the NPPF. The policy should reflect the 'avoid, mitigate and compensate' hierarchy set out in para 118 of the NPPF and distinguish between the different types of designation, making reference to nationally important sites. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.
- 6.4 SBC and NE **agree** that *para 5.145* should make reference to the 'conservation' rather than the 'preservation' of green spaces. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.
- 6.5 SBC and NE **agree** that *para 5.149* should recognise Knebworth Woods SSSI, as well as Rye Meads SSSI and the Lee Valley SPA. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.
- 6.6 SBC and NE **agree** that *Policy HO2 Stevenage West* should make reference to the requirement for development to provide suitable mitigation for recreational impacts and monitoring of the impacts of the proposal are properly accounted for through a mitigation and monitoring strategy. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.
- 6.7 SBC and NE **agree** that *Policies HO2 – HO4* (strategic housing allocation sites) should make reference to the grade of the agricultural land that is developed on. Whilst SBC **disagrees** with the broad statement that NE makes regarding the agricultural land around Stevenage being classified as BMV ('best and most versatile') – grades 1, 2 and 3a, SBC does recognise that within the grade 3 designation, identified by NE's agricultural land classification map, there will be pockets of higher grade land and these should be protected through the provision of open space. Notwithstanding this point, SBC is required to meet its OAN for housing within the Borough boundary. No other parcels of land are available for SBC to develop. SBC and NE **agree** that this point should be made clear within the supporting text for each strategic housing allocation site. SBC confirm the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.

## Sustainability Appraisal

- SBC and NE agree that Stevenage's Sustainability Appraisal is sound having worked together to find solutions for the issues that NE identified as being unsound.
- 7.1 SBC and NE **agree** that *Policy HO2 Stevenage West* has been extensively and sufficiently assessed through the 1998 Hertfordshire Structure Plan, 2004 Stevenage District Plan Second Review, the 2008 East of England Plan along with the West of Stevenage SPD and the detailed masterplan and application. SBC confirm that this will be clarified in the SA document prior to submission.
- 7.2 SBC and NE **agree** that the 45 sites in Stevenage identified for their wildlife value and local importance should be more clearly assessed throughout the SA. SBC confirm that this assessment will take place under the appraisal of each policy (where appropriate) the submission of potential rewording to the Planning Inspector for them to consider as part of the examination process.
- 7.3 SBC and NE **agree** that the assessment of *Policy EC1 Allocated sites for employment development* should clarify that new habitat can be created in Central Bedfordshire and North Herts, through our Duty to Co-operate, to contribute to the protection and enhancement of the Chilterns AONB. SBC confirm that this will be clarified in the SA document prior to submission.
- 7.4 SBC and NE **agree** that the Highways England biodiversity plan document, 'Our plan to protect and increase biodiversity', provides sufficient mitigation measures to address the negative effects that the provision of the SMART motorway scheme will have on the biodiversity adjacent to the A1(M) corridor. SBC confirm that this will be clarified in the SA document prior to submission.



Aidan Lonergan

Area Team Manager-West Anglia Team  
Signed on behalf of

Natural England

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Cllr John Gardner

Deputy Leader of the Council  
Signed on behalf of

Stevenage Borough Council

## **Appendix 2J: THE HISTORIC ENVIRONMENT**

Action 2: Meeting with Historic England

See evidence under Housing Action 2 (pages xx to xx)