



Stevenage Borough Local Plan 2011-2031

Revised Housing Targets Consultation (June 2015)

Statement of Consultation

Preparation - Publication - Submission - Adoption

Stevenage
BOROUGH COUNCIL

Statement of consultation

1 Introduction	2
2 Regulation 18 consultation	4
3 Consultation responses	6

Appendices 10

Appendix 1: Consultation material
Appendix 3: Respondents to June 2015 consultation
Appendix 3: Main issues raised in revised housing targets consultation
Appendix 4: Main issues raised in Local Plan First Consultation (June 2013)

1 Introduction

What is a Statement of Consultation?

1.1 A Statement of Consultation says how we have prepared our planning documents. It says who we consulted and when this happened. A Statement of Consultation summarises the responses that were sent to us. Where relevant, it also says how we have changed our document as a result of these comments.

1.2 This document allows people that sent us comments to see how we have dealt with them. People who did not send us comments but want to understand more about how we have prepared our plan may also find this document interesting and useful.

1.3 This Statement reports on the Revised Housing Targets consultation for Stevenage's new Local Plan.

What is the new Local Plan for Stevenage?

1.4 The current Stevenage District Plan Second Review (District Plan) was adopted in 2004. It is now more than ten years old. Since the District Plan was adopted, there have been a number of important changes. There are a number of topics and areas where new information has become available.

1.5 The combined effect of these changes means that some advice we have used to make decisions in the past has gone, or has been replaced. It means some policies will now not be available for us to use as we had planned.

1.6 It is now important that we put the right policies in place. This will help us make the best decisions when we are deciding planning applications. These policies will be set in a new Local Plan for Stevenage.

1.7 The timetable for writing the plan is set in a document called the Local Development Scheme (LDS). This is available on the Council's website, www.stevenage.gov.uk.

1.8 Government guidance says that our plans should look at least fifteen years into the future from the date they are adopted. The Local Plan will cover the period from 2011 to 2031.

How do we decide who to consult?

1.9 We are required by law to write a document called a Statement of Community Involvement (SCI). The SCI says which groups and organisations we will consult and how we will involve members of the public in our planning documents.

1.10 We updated our SCI in May 2012. It is available on our website, www.stevenage.gov.uk. The SCI says that we will use some or all of the following methods to consult you.

- You can see our plans at our offices, in local libraries and on our website.
- We will write to people who have told us they are interested in our planning documents. (We will do this each time there is a consultation).
- We will put adverts in the local newspaper.
- We will send out leaflets and brochures.

- We will set up exhibitions or displays and hold meetings.
- We will give presentations and host workshops.

1.11 We have a database which holds details of people, businesses and organisations that have told us they are interested in our planning documents. The Data Protection Act will be followed to ensure that personal data is kept securely and personal details are not disclosed.

2 Regulation 18 consultation

2.1 This section of the statement says who we consulted and why and when this happened.

2.2 We have to go through two different stages when we are preparing a new plan. Government regulations tell us what we must do. These stages are known as:

- Preparation of a local plan (this is known as Regulation 18); and
- Publication of a local plan (Regulation 19).

2.3 We are currently preparing the local plan. The regulations for this stage are set in broad terms⁽¹⁾. This means it is up to us to make decisions such as:

- The number of consultations to hold;
- Who we consult; and
- How long we consult for.

2.4 We also have a separate legal duty that we must meet. This is called the Duty to Co-operate. The Duty to Co-operate says we must work with other councils and certain named organisations when we are writing our plans⁽²⁾.

2.5 We will have to show that we have carried out the Duty to Co-operate before we are allowed to adopt a new plan. If we cannot show that we have carried out the Duty to Co-operate we will have to start again.

2.6 We have already carried out consultations to help us meet the requirements of Regulation 18 and the Duty to Co-operate:

2.7 A targeted consultation with other local authorities and Duty to Co-operate bodies was held between December 2012 and January 2013;

2.8 A public consultation on the new local plan was held between June and July 2013.

2.9 Separate consultation statements provide more details on both of these⁽³⁾. The Revised Housing Targets Consultation was the next stage in this process.

When was this consultation?

2.10 The consultation was approved by the Council's Executive on Tuesday 9 June 2015. This recommendation was considered by the Council's Overview and Scrutiny Committee on Monday 15 June 2015.

2.11 The Revised Housing Targets consultation started on Monday 22 June 2015. The consultation was open for five weeks. It ended on Monday 27 July 2015.

1 Regulation 18 of The Town and Country Planning (Local Planning)(England) Regulations 2012 SI2012 No. 767

2 Planning and Compulsory Purchase Act 2004 s33A (as inserted into that Act by the Localism Act 2011 s110)

3 Local plan - early stage consultation: Statement of consultation (SBC, 2013); Stevenage Borough Local Plan 2011-2031 First Consultation - Statement of Consultation (SBC, 2014)

What did we do?

2.12 The Revised Housing Targets consultation was publicised by a range of measures. These included:

- Writing to or e-mailing everyone on our local plan database to tell them about the consultation;
- Publishing the consultation documents on the internet, including a link from the front page of the Borough Council website for the duration of the consultation;
- Making hard copies of the documents available for inspection at the Borough Council's main offices in Danestrete as well as the libraries in the town centre and Old Town High Street;
- Advertising the consultation in the Council's Chronicle magazine which is sent to all households in the Borough;
- Issuing press releases and responding to press requests which resulted in articles in The Hertfordshire Mercury on 10 June (midweek paper edition) and 18 June (on-line);
- Announcing the consultation on the Council's Facebook page and Twitter feed;
- Providing a summary leaflet on the website with hard copies and posters distributed to libraries, community centres and children's centres in the town; and
- Discussing the consultation with the Borough's Youth Council (July 15)

2.13 A selection of the consultation materials are shown in Appendix 1.

Who responded to the consultation?

2.14 A total of **81 responses** were received to the consultation.

2.15 The responses have been analysed by Council officers to identify the different representations that have been made. A representation is each different comment that is made in a response. A response can contain more than one representation.

2.16 Each representation has been assigned to the most relevant question or section of the document. A total of **169 representations** have been identified.

2.17 The next section contains more detailed analysis of these results.

3 Consultation responses

3.1 This section provides a summary of what people told us during the consultation.

Number of responses

3.2 Of the 81 responses that we received:

- 53 were from members of the public. Of these, 37 had a Stevenage address; while
- 28 were from businesses or organisations such as parish councils or special interest groups
- 37 were received by email;
- 23 were made through our on-line consultation portal; and
- 21 were handwritten letters or forms.

3.3 Responses were received from both North Hertfordshire District Council and East Hertfordshire District Council, the two local authorities adjacent to the Borough.

3.4 Three of the nine Parish Councils which share a border with Stevenage responded to the consultation.

3.5 A full list of respondents is contained in Appendix 2.

Summary of responses to the Revised Housing Targets consultation

3.6 The consultation focussed on two interrelated issues and questions: the Borough housing target and the Green Belt. Two different housing target options and three different options in relation to the Green Belt were presented. In both cases, the Council said which option was its preferred approach (shown **bold** in each of the issues below).

3.7 All responses to the consultation have been analysed by the Council's planning officers. Representations were recorded against sections, questions or options where this was clearly stated by the respondent or officers were able to reasonably infer this information.

3.8 An example of a reasonable inference might be:

"The Council should not build new homes in the Green Belt. They should only build what they can in the urban area and leave the Green Belt alone".

3.9 This would have been recorded as support for option a for both the Housing Target and Green Belt questions.

3.10 A count of the representations received to each issue is set out below. A summary of the main issues raised by the consultation is contained in Appendix 3. The Council's broad response showing how these issues are addressed in the draft plan is also recorded.

Council response to the Local Plan First Consultation (2013)

3.11 As set out above, a Statement of Consultation reporting the results of the first consultation in the local plan was published in 2014. At the time, this did not include a summary of the main issues raised or a response setting out how these issues have been addressed. This was

because a number of matters would not be resolved until the plan reached 'Publication' stage. This stage has now been reached and the Council has determined its position in relation to the key policies and decisions that the Local Plan must make.

3.12 A summary of main issues from the 2013 consultation is contained in Appendix 4, along with a broad response showing how these were taken into account as the plan was prepared.

Housing

Issue 1: Revised Borough housing target options

Option	Number of homes 2011 31 Total	Number of homes 2011 31 Average per year
a: Maintain the Green Belt	5,300	265
B: Borough capacity	7,600	380

Question 1

Which housing option (a or b) do you think we should work towards? What are your reasons for choosing this level of development?

3.13 A total of **80 representations** were made or recorded against the Borough Housing Target chapter of the document (Chapter 2) by **70 respondents**. 55 of these respondents made an identifiable choice against the two housing target options presented in the consultation:

- 37 respondents supported option a; while
- 18 respondents supported option b.

Green Belt

Issue 2: The Green Belt

- Maintain the Green Belt
- Release land within the Borough for the period to 2031 only
- Release land within the Borough for the period to 2031 and work with neighbouring councils to identify land that might be needed after this time.**

Question 2

Should we maintain the existing Green Belt within Stevenage Borough? Or should we roll back the inner Green Belt boundary to meet our future needs? Should we work with North Hertfordshire and East Hertfordshire Districts to make sure we don't need to change the Green Belt boundary again by 2031.

3.14 A total of **75 representations** were made or recorded against the Green Belt chapter of the document (Chapter 3) by **67 respondents**. 53 of these respondents made an identifiable choice against the three options presented in the consultation:

- 37 respondents supported option a;
- 0 respondents supported option b; while
- 16 respondents supported option c.

Summary of other responses

3.15 A small number of additional comments were made against other sections of the document or were considered to be general comments that did not directly relate to either of the issues or questions above. A total of **14 representations** from **14 representors** have been categorised in this way.

3.16 A summary of the main issues raised, along with the Council's response, is contained in Appendix 3.

Late responses

3.17 Three (3) further responses were received after the deadline for the consultation had passed. These were from:

- P Brown
- Mr A Gardiner
- Home Builders Federation

3.18 These comments were reviewed to determine if they raised any substantive new issues that should be taken into consideration but have not been counted or analysed in this document.

Appendix 1: Consultation material

Article in the Midweek Mercury (print version)

MIDWEEK MERCURY

local news all day every day hertfordshiremercury.co.uk

COVERING
STEVENAGE,
STEVENAGE OLD
TOWN, WELWYN
& KNEBWORTH

Wednesday, June 10, 2015

INSIDE ...

The axe is set to fall on council budgets

Page 2

MPs fail to respond to salary hike proposals

Page 7

Down to a tea: we're backing campaign

Page 13

7,600 homes – but how many will be on green belt?

GROWING THREAT:
Houses bursting through the green belt
Illustration: Alex Lays

District council poised to consult over massive housebuilding plans

By Michael Havis
michael.havis@hertfordshirenews.co.uk

THE future of the county's green belt was labelled "pretty grim", as proposals to build thousands of homes in Stevenage went before councillors.

As the Mercury went to press yesterday (Tuesday), the executive committee of Stevenage Borough Council (SBC) was expected to approve consultation with the public over plans to earmark green belt land for development.

Under the council's preferred plan, swathes of green belt land in the borough would be designated for homes, with potential areas identified to the west, north and south of town.

If the approach is agreed, it could become part of the council's Local Plan, guiding development in the town up until 2031.

When it last consulted on its housing targets in 2013, the council expected 5,300 homes would meet the borough's future needs, but now space for 7,000 homes is being sought.

Kevin Fitzgerald, honorary director of the Campaign to Protect Rural England in Hertfordshire, said building on green belt land required exceptional circumstances. He told the Mercury: "The Government has repeatedly said that meeting your assessed housing need does not count as exceptional circumstances."

"Our view is the council shouldn't be doing this."

"The clear intention set out in

■ Turn to page 2

The Council's Facebook page

facebook

Email or Phone Password Log In

☐ Keep me logged in Forgotten your password?

Stevenage Borough Council is on Facebook.

To connect with Stevenage Borough Council, sign up for Facebook today.

Sign Up Log In

Stevenage Borough Council
Government Organisation

Timeline About Photos Likes More +

PEOPLE

1,948 likes

ABOUT

Working for Stevenage people
Contact us Mon - Fri: 9am - 5pm

<http://twitter.com/stevenagebc>
<http://stevenage.gov.uk/>

<http://www.stevenage.gov.uk/>

PHOTOS

Emerging Local Plan

Information about our new local plan that we are currently preparing. The plan will set a vision for our town to 2031.

STEVENAGE.GOV.UK

Like Comment Share

The Council's Twitter feed

Stevenage Council [@StevenageBC](#) Follow

Want to have your say on how many homes will be built in Stevenage in the future? Then visit our website stevenage.gov.uk/planning/plann...

2:21 am - 23 Jun 2015

© 2015 Twitter About Help Ads info

Article in the Council's Chronicle magazine



Have your say on the future of Stevenage

The council is continuing to prepare a new local plan for the Borough. This will say how Stevenage should grow and change over the next 15 years.

We would like to know your thoughts on this and will be starting public consultation later in June. This will ask for your opinion on the number of new homes that we should build to meet local needs. Your responses will help us to develop a draft local plan, which we will also ask you to comment upon before we send it to the Government to be examined.

You'll be able to take part in the consultation on the council's website and in your local library.

Look out for further publicity on our Facebook and Twitter pages over the next few weeks.



Appendix 2: Respondents to June 2015 consultation

Dr John S Alabaster	Mr Stephen Halls
Mr Russell Andrews	Mr Richard Harris
Anglian Water	Diana Hayward
Ms Margaret Ashby	Herts & Middlesex Wildlife Trust
Aston Parish Council	Hertfordshire Gardens Trust
Aston Village Society	Historic England
Dr Robin Bailey	Hitchin Town Action Group
Joseph Barnes	Edna Holt
Bellway Homes Miller Homes	Homes and Communities Agency
Ms Sarah Bisset Scott	Mr. Peter Howard
Mr Richard Blake	Miss Nicola Hughes
Bloor Homes	Mrs Susan Jones
Mr Peter Bracey	Mrs Andrea Kelly
Virginia and Rodney Cole	Knebworth Estates
M Courtman	Knebworth Parish Council
CPRE Hertfordshire	Mr Alan Lines
Croudace Homes Ltd	Mrs Madeline Lovelock
Mr Matt Dranse	Mr J A McNab
Mr & Mrs Bernard Drummond	Mr Stephen McPartland MP
East Hertfordshire District Council	Mr John Morgan
Mr Simon Farrow	Mr Andrew Morris
Mr & Mrs French	Natural England
Friends of the Forster Country	North Hertfordshire and Stevenage Green Party
Graveley Against SNAP Proposals (GASP)	North Hertfordshire District Council
Graveley Parish Council	Mr. David Norton
Greene King Plc	Mrs Marion Ohlendorf
Mr Brian Hall	Mr Rick Ohlendorf

Persimmon Homes
Pigeon Land Ltd
Prince
Mrs June R Pitcher
Mr Stephen Prince
Mr Edward Pugh
Marlene Raftery
Mr Jack Rigg
RPF Developments
Mr Peter Scott
Selby
Mrs Kath Shorten
C J A Slater
Mr G Smith
John C Spiers
Ms R Stevenson
D G Stimpson
Mr David Stone
mr david sully
Thames Water
Frank Townsend
Transport for London
Mrs Elaine Vaton
Ms. Jennifer Woodget
M Wright
Mr David Yates-Mercer
Mrs Verity Yates-Mercer

Appendix 3: Main Issues raised in revised Housing Targets Consultation

The tables on the following pages set out Council's view of the main issues raised in the Revised Housing Targets Consultation of June 2015. An explanation of how these issues are addressed in the draft plan is provided. Original representations can be viewed on the Council's online consultation software or upon request at the Borough Council offices.

The following abbreviations and acronyms have been used:

EHDC	East Hertfordshire District Council	PDL	Previously Developed Land
HCC	Hertfordshire County Council	SA	Sustainability Appraisal
IDP	Infrastructure Delivery Plan	SHMA	Strategic Housing Market Assessment
NHDC	North Hertfordshire District Council	SLAA	Strategic Land Availability Assessment
NPPF	National Planning Policy Framework	SUDs	Sustainable Urban Drainage system

Main issues raised in written comments (SBC summary of comments received)	How the main issues are addressed
Balance / prioritisation between housing and open spaces	The Council has taken a holistic approach which considers landscape and open space alongside the purposes of Green Belt. Only sites that have been promoted for development through the SLAA can be considered. The Green Space Strategy strongly encourages the retention of existing sites to meet future needs.
Calculation of the housing target and relationship with the wider housing market area	The NPPF and associated guidance sets out clear expectations as to how housing requirements should be calculated. This is reflected in the evidence base. The method for calculating our Objectively Assessed Need (OAN) is considered robust and is consistent with a number of surrounding authorities. The housing target in the draft plan shows only a minimal difference from the latest household projections. The Housing Technical Paper considers requirements in the wider Housing Market Area.
Compatibility with plans of surrounding authorities and the consideration of cumulative impacts	The plan and its evidence base acknowledges the interrelationship between allocations within the Borough and other sites beyond our boundaries. This issue is also explored in the Housing Technical Paper. The Sustainability Appraisal (SA) addresses cumulative impacts while the IDP has regard to proposed sites beyond the administrative boundary. Where appropriate, the draft plan requires developments to make provision for integration with future phases beyond the Borough boundary.
Concerns over, and objections to, the prospect of Green Belt release and / or development to the east of the town	The draft plan does not propose any development to the east of Stevenage. We cannot make decisions about land outside the Borough boundary. The draft plan maintains a physical buffer between Stevenage and Aston and retains the Green Belt status of <u>land to the east of Gresley Way</u> .
Consistency between the Green Belt Review and the SLAA in terms of maintaining separation between Stevenage and <u>surrounding settlements</u>	The fact that preventing the merging of towns and villages is not a purpose of Green Belt does not mean there are no other planning grounds for maintaining that separation. This latter approach is <u>taken in the SLAA</u> .
Difficulties of long-term planning and whether Green Belt releases can be justified on this basis	The NPPF is clear that plans should plan for 15 years from the point of adoption. The 2011-2031 planning period of the draft plan reflects this.
Impact of Green Belt release on other factors including agricultural, ecological, landscape and / or recreational value	The NPPF does not include these issues amongst the purposes of Green Belt. These issues have been separately considered through the SA and relevant evidence studies including the <u>Landscape Sensitivity and Capacity Study</u> .
Impact on surrounding rural areas and villages, including coalescence	The Council has taken a holistic approach which considers landscape and open space alongside the purposes of Green Belt in developing its strategy. The evidence base and SA should be referred to. Development within the Borough boundary will not result in coalescence with surrounding villages. We cannot make decisions about land outside the boundary.
Impact upon 'Forster Country' to the north of Stevenage and / or objections to the release of Green Belt land for development in this area	The plan considers that development can be accommodated to the north of Stevenage without significant harm to the wider purposes of the Green Belt. A Heritage Statement has been completed to assess the impact of development on 'Forster Country'. The draft plan supports the use of land within the Conservation Area and Green Belt where they support the aims and purposes of those <u>designations</u> .
Impacts upon historic environment	Heritage Impact Assessments for proposed allocations in or <u>adjacent to Conservation Areas have now been completed</u> .
'In principle' objections to the release of Green Belt, harm to the Green Belt and the subjective or flawed nature of the Green Belt review	The method for the Green Belt review is considered robust and is broadly consistent with a number of surrounding authorities. It is considered that land can be released from the Green Belt around Stevenage without harm to its overall purposes. This is explored in the draft plan and the Housing and Green Belt Technical Papers.

Main issues raised in written comments (SBC summary of comments received)	How the main issues are addressed
Inconsistency of proposals with Government announcements on the Green Belt	The NPPF supports the review of Green Belts through the local plan process in exceptional circumstances. Having regard to relevant case law, we consider that exceptional circumstances can be demonstrated. This is explored further in our Housing Technical Paper and Green Belt Technical paper.
Lack of supporting infrastructure	The draft plan is supported by an updated Infrastructure Delivery Plan which considers schemes necessary to support growth. This is, in turn, supported by a number of subsidiary studies and investigations.
Locations(s) of proposed development, including the role of previously developed sites	The SLAA identifies sites which meet the tests to be allocated for housing. The Housing Technical paper explores how we have moved from the findings of the SLAA to the proposed allocations in the plan, including why it is not appropriate to simply use all sites and yields in the SLAA. It also examines how development in and around the town contributes, or might contribute, to requirements in our wider housing market area.
Majority support for the lower housing target and retention of existing Green Belt by consultation respondents	Consultation responses are one input to a balanced planning judgement that must be made taking into account the requirements of Government guidance and the findings of evidence. Having made this judgement, it is considered appropriate to continue with the preferred approach set out in the Revised Housing Targets consultation.
Other sites suggested for release from the Green Belt	Sites have only been released from the Green Belt where it is considered that exceptional circumstances exist. This is explored and explained in our housing, employment and Green Belt technical papers.
Relationship between future housing and economic needs	The draft plan is informed by evidence on both housing and employment. Our Employment Technical Paper explores the relationship between jobs and homes.
The need to work with neighbouring councils	The Council has worked continuously, constructively and on an on-going basis in the production of the draft plan as required by the Duty to Co-operate.
The proper consideration of reasonable alternatives, including failure to consider the option of a New Town outside of the Green Belt	The SA sets out how reasonable alternatives have been generated and considered. The concept of a new settlement has been discussed with neighbouring authorities under the Duty to Co-operate. It is not considered that this represents a 'reasonable alternative' in the period to 2031. Exploratory work has begun on a new settlement for post-2031.
The translation of the Objectively Assessed Need into the housing target	The plan and Housing Technical Paper explore this issue and demonstrate that we have included a small buffer of additional sites.
Whether <i>exceptional circumstances</i> have been demonstrated to review the Green Belt and that all suitable non-Green Belt sites have been taken into account	Having regard to relevant case law, we consider that exceptional circumstances can be demonstrated. This is explored further in our Housing and Green Belt Technical Papers. The Housing Technical Paper demonstrates that Green Belt releases are required to meet our housing target within the Borough boundary. The Green Belt Technical Paper explains how our approach has been developed.
Whether Stevenage should continue to grow	The draft strategy is a balanced planning judgement between the requirements of Government advice and the findings of our evidence base. The SA explores how reasonable alternatives for the future were developed.

Appendix 4: Main issues raised in Local Plan First Consultation (June 2013)

The tables on the following pages set out Council's view of the main issues raised in the Local Plan First Consultation of June 2013. An explanation of how these issues are addressed in the draft plan is provided. Original representations can be viewed on the Council's online consultation software or upon request at the Borough Council offices. The 2014 Statement of Consultation provides further details on this consultation⁽⁴⁾.

The following abbreviations and acronyms have been used:

EHDC	East Hertfordshire District Council	PDL	Previously Developed Land
HCC	Hertfordshire County Council	SA	Sustainability Appraisal
IDP	Infrastructure Delivery Plan	SHMA	Strategic Housing Market Assessment
NHDC	North Hertfordshire District Council	SLAA	Strategic Land Availability Assessment
NPPF	National Planning Policy Framework	SUDs	Sustainable Urban Drainage system

4 Stevenage Borough Local Plan 2011-2031: First consultation, Statement of Consultation (SBC, 2014)

Main issues raised in written comments (SBC summary of comments received)	How these issues have been addressed?
Employment	
Balance between the provision of homes and jobs	The plan and associated evidence base demonstrate the potential to achieve a broad balance between housing and employment provision across the wider A1(M) corridor. The Employment Technical Paper considers the balance between homes and workers in Stevenage.
Calculation of employment requirements	The method for calculating our employment requirements is considered robust. The Employment and Economy Baseline study utilises a method that has been employed by other councils. The Employment Technical Paper uses the method employed in this study to estimate employment requirements arising from subsequent forecasts.
Comments / objections in relation to impact on 'Forster Country'	This site is no longer being pursued for employment development
Comments / objections in relation to potential impacts on nationally designated sites and heritage assets	The sites suggested in 2013 that were close to nationally designated sites and / or heritage assets are no longer being pursued for employment development. All the draft site allocations have been subject to SA and mitigation measures are identified where appropriate.
Comments / objections in relation to use of Green Belt land	Having regard to relevant case law, we consider that exceptional circumstances can be demonstrated. This is explored further in our Employment and Green Belt Technical Papers. The Employment Technical Paper demonstrates that Green Belt releases would be required to meet employment requirements within the Borough boundary. The Green Belt Technical Paper explains how our approach has been developed.
Comments on (types of) sites	Since the completion of the 2013 consultation, two updates to the employment SLAA have been produced. This ensures that the sites being promoted for allocation in the plan have been 'screened' for significant constraints and meet the relevant tests to be included in the plan.
Comments on the range / types of jobs and premises to be provided	The draft plan contains a balanced employment strategy designed to provide opportunities for growth across a range of sectors and business types.
Creating a link between education, skills and employment	This aspiration is acknowledged in the draft plan though there are limits to which land-use planning can directly influence this issue.
Ensure policy framework is flexible / not too restrictive	The draft plan strikes a reasonable balance by introducing a 'light touch' zonal approach. Certain areas are identified for (more) specific uses and / or unit types. We believe the approach accords with advice in the NPPF and the Government's aspiration to deliver sustainable economic growth.
Need to prioritise use of previously developed sites and / or intensify existing premises	The draft allocations have been chosen sequentially; sites on PDL have been prioritised. The Employment Technical Paper explains how additional allowances have been made for the intensification of existing areas of Gunns Wood.
Need to understand infrastructure requirements for new sites	The draft plan is supported by an updated Infrastructure Delivery Plan which considers schemes necessary to support growth. This is, in turn, supported by a number of subsidiary studies and investigations.
Need to work with other authorities / partners	The Council has worked continuously, constructively and on an on-going basis with relevant authorities and agencies in the production of the draft plan as required by the Duty to Co-operate. Landowners and agents have participated in the preparation of the SLAAs and the viability evidence which underpin the plan.

Main issues raised in written comments (SBC summary of comments received)	How these issues have been addressed?
Suggestions that no further employment land is needed and / or should be provided	The NPPF is clear that authorities should have an understanding of future development needs and identify the sites where this will be met. We consider that the methods used to determine future employment requirements are robust. Failing to provide additional employment land would result in an imbalanced strategy.
Use employment sites for housing where there are long-term vacancies	This approach has been pursued. The Employment and Economy Baseline study identified a number of town centre office buildings were vacant and / or no longer fit for purpose. Many of these are now being converted for residential use.
Retail	
Approach to retail warehouse units is overly prescriptive and conflicts with NPPF	The Council's evidence base provides strong support for the 'town centre first' approach contained in the draft plan. Although an important component of the Borough's retail offer, the threat of further erosion of the town centre offer is identified.
Comments on transport infrastructure	Policies on the town centre within the draft Local Plan have been based on the Town Centre Framework, produced to guide the large-scale redevelopment of this area. This sets out a movement strategy which aims to relocate the bus station, improve the station and remove Lytton Way to vehicular traffic. This package of measures should aid legibility and support the growth of the town centre.
Heritage assets should be protected and enhanced	A Heritage Impact Assessment has been completed. This sets out mitigation measures to minimise the impact of development on these heritage assets, and aims to ensure the character and features of the area are retained.
Policies should not be overly prescriptive	Our draft Local Plan provides policies on each of the Major Opportunity Areas identified in the Town Centre Framework. It sets out the Use Classes that will be permitted within these areas and some design and land use principles for each. It recognises that the proposals may not follow the Framework exactly and that flexibility will be required.
Whether additional retail units are required	The plan is supported by an evidence base which identified the needs for both quantitative and qualitative improvements to the town's shopping offer.
Whether proposed impact assessment thresholds are appropriate	The thresholds for impact assessments in the draft plan are supported by robust evidence.
Calculation of convenience retail requirements	The retail evidence base was subject to a partial update to take account of revised Government population projections.
Transport and Infrastructure	
(Lack of) capacity on A1(M)	A SMART Motorway scheme for the A1(M) between Welwyn and Stevenage was announced in 2014.
Ability of development to fund all identified infrastructure requirements	An Infrastructure Funding Strategy has been completed to complement the IDP and viability studies. It identifies a modest funding gap, but also identifies potential solutions.
CIL to be developed alongside the plan	The Whole Plan Viability Study recommends that CIL be implemented in Stevenage. This will be subject to a separate process and examination though it is intended to develop CIL in parallel with the local plan examination process.
Ensure proposals meet viability requirements as per NPPF	A Whole Plan Viability Study was completed in 2015 and identifies that the cumulative impact of policy proposals would not put delivery of the plan at serious risk.
Need to improve / integrate sustainable transport provision	This issue is acknowledged in the draft plan. A number of policies have been included to ensure that sustainable transport provision is made as an integral part of new development. A number of priority schemes are identified.
Need to understand infrastructure requirements / lack of supporting infrastructure	The draft plan is supported by an updated Infrastructure Delivery Plan which considers schemes necessary to support growth. This is, in turn, supported by a number of subsidiary studies and investigations.

Main issues raised in written comments (SBC summary of comments received)	How these issues have been addressed?
Need to update Water Cycle Study	The Rye Meads Water Cycle Strategy Review was completed in 2015 and forms part of the draft plan's evidence base.
Prioritise affordable housing	The provision of affordable housing is one of the Council's top priorities. The viability work underpinning the plan demonstrates that both affordable housing provision <u>and</u> infrastructure contributions can be supported.
Housing	
Approach to housing needs to consider green infrastructure, landscape sensitivity and Green Belt	The Council has taken a holistic approach which considers landscape and open space alongside the purposes of Green Belt. Only sites that have been promoted for development through the SLAA can be considered. The Green Space Strategy strongly encourages the retention of existing sites to meet future needs.
Affordable housing requirements to be informed by viability evidence	A Whole Plan Viability Study was completed in 2015 and informs the target levels of provision set out in the draft plan.
Aspirational homes are an inefficient use of land	Our Aspirational Homes Research suggests that a modest proportion of these homes can be accommodated without an undue impact upon the density achievable across the site as a whole. The plan only seeks to build 3% of homes as aspirational over the plan period.
Avoid the blanket application of housing mix policies	The plan sets a Borough-wide target for units sizes but recognises the need for a pragmatic approach which looks at sites on a case-by-case basis.
Calculation of housing target and relationship with the wider housing market area	Since this consultation, a revised SHMA has been produced to meet the clear expectations in the NPPF and associated as to how housing requirements should be calculated. This is reflected in the evidence base. The method for calculating our Objectively Assessed Need (OAN) is considered robust and is consistent with a number of surrounding authorities. The housing target in the draft plan shows only a minimal difference from the latest household projections. The Housing Technical Paper considers requirements in the wider Housing Market Area.
Comments on / objections to potential Gypsy and Traveller sites or areas	Since the completion of the 2013 consultation, a Gypsy and Traveller site search has been completed. This informs the allocation in the draft plan. Further information is included in the Housing Technical Paper.
Comments on / objections to potential housing sites or areas	Since the completion of the 2013 consultation, two updates to the housing SLAA have been produced. This ensures that the sites included as allocations in the draft plan have been 'screened' for significant constraints and meet the relevant tests to be included in the plan.
Comments on / support for potential housing sites or areas	
Comments on potential affordable housing targets	A Whole Plan Viability Study was completed in 2015 and informs the target levels of provision set out in the draft plan.
Compatibility with plans of surrounding authorities and the consideration of cumulative impacts	The plan and its evidence base acknowledges the interrelationship between allocations within the Borough and other sites beyond our boundaries. This issue is also explored in the Housing Technical Paper. The SA addresses cumulative impacts while the IDP has regard to proposed sites beyond the administrative boundary. Where appropriate, the draft plan requires developments to make provision for integration with future phases beyond the Borough boundary.
Consider the impact of house conversions	The draft plan contains a policy on windfall housing sites which requires issues such as parking and residential amenity to be taken into account.
Consider the need for a joint SHMA	Since this consultation, a revised SHMA has been produced jointly with North Hertfordshire District Council.

Main issues raised in written comments (SBC summary of comments received)	How these issues have been addressed?
Consistency between the Green Belt Review and the SLAA in terms of maintaining separation between Stevenage and surrounding settlements	The fact that preventing the merging of towns and villages is not a purpose of Green Belt does not mean there are no other planning grounds for maintaining that separation. This latter approach is taken in the SLAA.
Importance of Duty to Co-operate / relationship with surrounding authorities	The Council has worked continuously, constructively and on an on-going basis with relevant authorities and agencies in the production of the draft plan as required by the Duty to Co-operate.
Majority support for lower housing target	Consultation responses are one input to a balanced planning judgement that must be made taking into account the requirements of Government guidance and the findings of evidence. Having made this judgement, it is considered appropriate to continue with the principles set out in the 2013 consultation, albeit that the numbers were subsequently revised and re-consulted upon.
Need for evidence to support Gypsy and Traveller provision	A Gypsy and Traveller Accommodation Study was completed in 2013 following the consultation.
Need to consider implications of aging population	Population projections underpin the assessment of housing requirements. The draft plan acknowledges the need to provide (inter alia) 1- and 2-bed homes, sheltered and supported housing and adaptable and accessible dwellings.
Need to demonstrate exceptional circumstances for Green Belt development	Having regard to relevant case law, we consider that exceptional circumstances can be demonstrated. This is explored further in our Housing and Green Belt Technical Papers. The Housing Technical Paper demonstrates that Green Belt releases are required to meet our housing target within the Borough boundary. The Green Belt Technical Paper explains how our approach has been developed.
Need to understand infrastructure requirements / lack of supporting infrastructure	The draft plan is supported by an updated Infrastructure Delivery Plan which considers schemes necessary to support growth. This is, in turn, supported by a number of subsidiary studies and investigations.
Reduce housing inequalities	The draft plan aims to provide a mix of types and sizes of new homes, to meet the needs identified within our evidence work. It also aims to provide around 40% affordable homes throughout the plan period.
Green Belt	
Brownfield sites should be intensified.	A number of Brownfield sites, including the town's neighbourhood centres and the town centre, are being considered for redevelopment. This will involve the intensification of uses to facilitate increased residential use. Potential development sites are assessed in the Strategic Land Availability Assessment (SLAA). In general terms, previously developed sites will be developed in preference to Green Belt sites.
Concerns relating to / objections to the approach and methodology of the Green Belt Review.	The Green Belt Review has been carried out by specialist consultants. The method is considered robust and is one that has been employed by other councils. The methodology was developed in light of NPPF guidance on Green Belt issues. It assesses sites against the five recognised Green Belt purposes. Our neighbouring authorities were invited to work with us on this review, and a strategic approach has been taken.
Need to consider the impact on heritage assets and the wider historic environment.	Heritage Impact Assessments have been produced for all potential development sites that might impact upon a conservation area. Specific policy measures will be incorporated to mitigate any negative impacts that might result from development. National policy and local policies provide protection for heritage assets more generally.

Main issues raised in written comments (SBC summary of comments received)	How these issues have been addressed?
Concerns relating to Forster Country / countryside in general	The Local Plan aims to provide a balance between competing land uses. Providing the growth required to meet our identified needs is likely to result in the loss of some Greenfield land. The Borough Council recognises the importance of retaining open space to the North of the Borough and in ensuring the historical significance of Forster Country is recognised. Local Wildlife Sites are designated across the Borough to protect those sites of the highest wildlife value.
Concerns relating to development to the East and south.	The Green Belt Review assesses all sites around the edge of the Borough, which may have potential for development. However, this only forms one part of our evidence base. Sites to the east of Stevenage (within the Borough boundary) were previously assessed in the SLAA and not considered to be suitable for residential use. Land to the south east of the Borough, at Bragbury End, is being considered for development. If new development is to go ahead here, local facilities will be required to ensure a sustainable scheme.
Findings of the Green Belt Review are inconsistent with the findings of the SLAA.	Our plan is informed by many evidence studies, relating to different issues and requirements. These studies may not come to the same conclusions. Technical papers on Housing and the Green Belt explain in more detail how we have used and balanced the results of these studies to inform our approach to the Local Plan.
Consider impact on traffic / congestion. Insufficient infrastructure to accommodate new development	The draft plan is supported by an updated Infrastructure Delivery Plan which considers schemes necessary to support growth. This is, in turn, supported by a number of subsidiary studies and investigations.
Working with EHDC / NHDC under Duty-to-Cooperate.	The Council has worked continuously, constructively and on an on-going basis with our neighbouring authorities. EHDC and NHDC were invited to work with us on the Green Belt Review, and a strategic approach has been taken. We will continue to work with our neighbours in the future to ensure a defensible, strategic Green Belt boundary is retained. We cannot plan for land outside of our Borough boundary.
Need to identify land in neighbouring authorities post-2031 has not been adequately justified	When undertaking a Green Belt Review, the NPPF requires local authorities to consider a long term approach, to ensure new boundaries are capable of enduring beyond the plan period. We cannot plan for land outside of our boundary, but working with our neighbours should ensure this long term approach is considered strategically.
Need to demonstrate exceptional circumstances to justify roll back of the Green Belt	Having regard to relevant case law, we consider that exceptional circumstances can be demonstrated. This is explored further in our Housing and Green Belt Technical Papers. The Housing Technical Paper demonstrates that Green Belt releases are required to meet our housing target within the Borough boundary. The Green Belt Technical Paper explains how our approach has been developed.
Open Space	
Council's approach to 'Forster Country' needs to be clarified.	The draft plan includes a policy relating to Forster Country
Ensure preservation of green infrastructure of all types and scales / support for preservation and protection of smaller spaces	Following the completion of updated evidence, the number of sites given protection in the draft plan as Principal Open Spaces has increased significantly.
Functionality of open spaces should be considered alongside numerical provision	The Open Space Strategy considers the functionality of open spaces in reaching its conclusions.
Need to update evidence base	A new Open Space Strategy was completed in January 2015. This supersedes the previous study and provides the basis for the policies and allocations in the draft plan.

Main issues raised in written comments (SBC summary of comments received)	How these issues have been addressed?
Community facilities	
Additional healthcare provision are required	Our Infrastructure Delivery Plan sets out the healthcare provision that is likely to be required to meet the needs of our Local Plan. Site specific policies relating to new large-scale housing schemes require identified needs to be met.
Concern over ability of hospital to meet future needs (expansion)	The Lister Hospital have not expressed the need for any additional land to accommodate a future expansion.
Concern over the loss of the Rugby Club facilities	The Rugby Club site is not required to meet future healthcare needs. However, it has been assessed within the SLAA as a potential development site for residential use. Since the consultation, we have updated our evidence on sports facilities within the Borough. The results of this work require the facilities to be reprovided if the site is to be released for development. Our draft Local Plan reflects this approach.
Concern over use of public open spaces to accommodate school expansions	Public open spaces are protected from development in the draft Local Plan.
Consider relationship with school capacity catchments / neighbouring authorities	We are working with both HCC and our neighbours to ensure a strategic approach to education facilities is taken. Up-to-date needs will be met within the most suitable location available.
Existing D1 uses should be protected and new provision made.	Our draft plan sets out policies to protect existing leisure and cultural facilities and to ensure new facilities are provided to serve the needs of the town.
Existing schools should be expanded before new provision is made	New provision will be required at large-scale new developments. Our evidence shows that the needs of the smaller sites can be met through the expansion of existing schools.
Need to provide / retain local facilities	The concept of neighbourhood centres was a key part of the original Masterplan for Stevenage. Although needs have changed, we have taken on board the importance people place on these facilities. The draft Local Plan aims to protect existing facilities and to enhance the neighbourhood centres by regenerating those which require significant improvements. Any development sites which do not have easy access to existing local facilities will be required to provide these according to identified needs.
Neighbourhood centres to be maintained and regenerated	A number of the neighbourhood centres have been assessed in the SLAA for their development potential. Many of the centres are in need of regeneration and intensification of these sites to allow for increased residential use provides the opportunity to do this. Any redevelopment will be required to retain the neighbourhood centre function.
Provide community facilities for all ages	Our draft plan aims to provide a mix of facilities, which benefit all members of the community. Our Sustainability Appraisal assesses the impact of potential policies within the plan. It considers the social impacts of policies on all members of the community.
Provision of a new secondary school	The draft Plan protects the former Barnwell East school site for the provision of a new secondary school.
Provision of parking for town centre users	The draft Local Plan provides a policy on parking to ensure appropriate provision is made. Parking charges are not controlled by the local planning authority, so are outside the scope of our Plan.
Provision of school types	We have provided sufficient land to meet the requirements for school provision up to 2031. The Local Plan is not responsible for delivering new schools.
Proximity of new schools to new homes	Large-scale new developments (over 500 homes) will be required to provide a primary school on-site, where an up-to-date need for this is identified by HCC. Applications for smaller windfall sites that are not within walking distance of existing schools will also be required to provide a new school, where HCC identify this as an issue.

Main issues raised in written comments (SBC summary of comments received)	How these issues have been addressed?
Recognise role of Forster Country for informal leisure and recreation	The Borough Council recognises the importance of retaining open space to the North of the Borough. The draft plan preserves part of Forster Country for this purpose.
Redevelopment supported to enhance existing leisure / cultural provision	The regeneration of the town centre is a key priority for the Borough Council. The Stevenage Central Framework has been produced to guide redevelopment within this area. Our draft Local Plan reflects the Framework approach. It is hoped that this will encourage investment in the town centre, which will in turn enable further enhancement of its facilities.
Relocation of the hospital is not a realistic option	The Borough Council would not wish to see the Lister Hospital relocated to an alternative site. The draft plan protects the Lister Hospital site from redevelopment.
Specific sites suggested to provide leisure and cultural facilities	New leisure and cultural facilities will be encouraged where a need has been identified and land is not required for other uses. A sequential text will be required for those facilities classed as main town centre uses, to ensure the most sustainable sites are utilised.
Design, heritage and sustainability	
Avoid duplication of national standards and policies	The draft plan has regard to the new optional Technical Standards introduced by Government following this consultation.
Concerns over water levels in the River Beane	Although outside the direct control of the plan, the Rye Meads Water Cycle Strategy Review identifies that abstraction within this area is to be significantly reduced without compromising water availability
Heritage assets, and their settings, should be protected.	The draft plan emphasises the importance of the town's historical assets and identifies policies to protect and enhance these, where possible. National guidance cannot be repeated and will be used to determine development proposals. Heritage Impact Assessments for development sites within or adjacent to conservation areas have been produced, which seek to minimise the impacts of development.
Need to ensure capacity in water supply and wastewater networks	The Rye Meads Water Cycle Strategy Review was completed in 2015 and forms part of the draft plan's evidence base.
Need to ensure robust approach to contamination and pollution	The draft plan contains policies on these issues
Site-specific concerns relating to SUDs, flooding, drainage etc.	The draft plan is informed by a Strategic Flood Risk Assessment. The draft plan includes policies relating to flood risk and the provision of SUDs.
Viability impacts of sustainability standards	The costs associated with the imposition of the Government's new Technical Standards have been broadly considered in the viability study which underpins the draft plan.
Whether scope of Local Plan policies relating to heritage will be appropriate.	The draft Local Plan cannot repeat National Policy. A local policy has been included to identify specific requirements relating to heritage assets and archaeological sites within the Borough.

