

DATED _____ **14 August 2025**

Memorandum of Understanding under the Duty to Co-operate

between

Stevenage Borough Council (SBC) and Historic England (HE)

on

The Review and Partial Update of Stevenage Borough Local Plan

Date of agreement: 14 August 2025

1.0 Scope of the Statement

- 1.1 This Memorandum of Understanding (MoU) has been prepared under the Duty to Co-operate requirements. It provides a position statement on the extent of co-operation and understanding in respect of the partial update of the Stevenage Borough Local Plan 2011-2031 (the “Local Plan Partial Update”). The MOU is intended to set out the position of HE and SBC and be kept up to date as SBC as a local planning authority reaches key milestones in the preparation of their plan.
- 1.2 The MOU is intended to highlight those matters of joint interest and the extent of agreement, or otherwise, in accordance with the National Planning Policy Framework (NPPF) (2023) paragraphs 24-27. It is a shared objective of both HE and SBC to facilitate the timely progression of a sound local plan review in accordance with legislation.
- 1.3 On 12 December 2024, Government released the updated NPPF. For plan making, there is a transition period of three months from 12 December 2024 to 12 March 2025 whereby plans can proceed under the former NPPF (December 2023). However, the Local Plan must be at Regulation 19 pre-submission publication stage before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need.
- 1.4 Given that the Local Plan Partial Update reached Regulation 19 stage before that date and the draft housing requirement meets in excess of 80% of local housing need, under the transitional arrangements outlined above, this means that the Local Plan Partial Update will be submitted and examined under the previous NPPF 2023 and not the current NPPF 2024.

2.0 Stevenage Borough Local Plan 2011 – 2031

- 2.1 This MOU has been prepared in the context of the Addendum version of the Local Plan Partial Update which was placed on public deposit for a six week period ending 4 August 2025. The MOU was prepared concurrently. Submission of the plan to the Secretary of State for independent examination is expected imminently.

3.0 Matters agreed and outstanding and programme of actions

- 3.1 Engagement between the two under the Duty to Co-operate has focussed primarily on:
- Climate Change
 - Green Roofs
 - Station Gateway Opportunity Area
 - Highstreet Shopping Areas
 - Flooding
- 3.2 This MOU highlights how there is a shared and common objective to resolve the issues in a manner which encompasses joint technical working, continuing Member involvement and through to the timely adoption of the Local Plan Partial Update. Set out in this memorandum are those matters of joint interest to HE and SBC as they are dealt with in the Local Plan Partial Update in accordance with paragraph 24 – 27 of the National Planning Policy Framework, December 2023.

Discussions between HE and SBC

- 3.3 Discussions between HE and SBC have embraced strategic matters that relate only to the elements of the Local Plan that SBC are proposing to update.
- 3.4 Both HE and SBC are content that collaboration has been met thus far and ongoing liaison will ensure that both HE and SBC will continue to maintain effective cooperation. It is the opinion of HE that the Local Plan Partial Update is sound and has been correctly prepared in so far as it relates to the responsibilities and interests of Historic England. Both HE and SBC agree they will continue to work together to try find solutions to support the delivery of the plan.

AMarsh

Andrew Marsh

Historic Environment Planning Adviser for
Historic England

Signed on behalf of

Historic England



Alex Robinson

Assistant Director for Planning and
Regulation

Signed on behalf of

Stevenage Borough Council

Issue	HE comment	SBC comment	Outcome
Climate Change	<p>POLICY SP1</p> <p>While we welcome the proposed new Policy SP1, we believe it should be expanded to include sections that address energy efficiency and the retrofitting of existing (including historic) buildings. Approximately one quarter of the UK's building stock is at least 100 years old, and these buildings can and must adapt, not only to support the transition to a Net Zero society, but also to improve energy/cost-efficiency and thermal comfort for occupants, and to ensure they remain safe, desirable and viable assets for future generations to enjoy.</p> <p>Mitigating climate change and conserving historic buildings are compatible goals. Keeping historic buildings in use through sensitive repair, maintenance, and adaptation can help lower carbon emissions, reduce reliance on fossil fuels, and decrease energy costs. Additionally, the most sustainable building is one that already exists. The ongoing repair, maintenance, use, and re-use of historic structures prevent the unnecessary release of embodied carbon associated with the materials, transport, and processes involved in demolition and new construction.</p> <p>Further guidance can be found in our new Advice Note on adapting historic buildings for energy and carbon efficiency, published in July 2024.</p> <p>This document provides clarity and supports consistent decision-making for proposals aimed at reducing carbon emissions and improving the energy efficiency of historic buildings.</p>	<p>Comments acknowledged and noted.</p> <p>The council cannot mandate retrofitting through the local plan and can only set policies for development.</p> <p>Where retrofitting does require planning permission, it will be supported by virtue of the proposed new climate change policies.</p> <p>Appropriate protection will also be afforded to heritage assets by the existing heritage policies, which largely reflect the policies set out in the NPPF.</p>	<p>No change.</p>

	<p>It reflects current national planning policy and includes clear advice on insulation, boilers and heating systems, heat pumps, draft-proofing, replacing or adapting windows, and installing solar panels.</p> <p>You can access the Advice Note via the following link:</p> <p>https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/heag321-adapting-historic-buildings-energy-carbon-efficiency/</p> <p><u>Our recommendation</u></p> <p>Expand Policy SP1 to include energy efficiency and retrofitting or include a new separate policy that addresses these issues</p>		
Policy CC6 Green Roofs	<p>SUPPORTING TEXT PARAGRAPHS 6A.35 TO 6A.42</p> <p>We welcome supporting text which requires proposals to consider the affects on nearby heritage assets. This is consistent with the National Planning Policy Framework (NPPF), specifically paragraph 201, which states that local planning authorities should require applicants to describe the significance of any affected heritage assets, including those impacted by changes to their setting.</p> <p>The inclusion of this text should ensure that heritage issues are not overlooked during the planning process, and promote a holistic approach to development, where environmental sustainability (in the form of green roofs)</p>	Comments acknowledged and noted.	No change.

	<p>is balanced with the conservation and enhancement of the historic environment.</p> <p><u>Our recommendation</u></p> <p>None.</p>		
Station Gateway Major Opportunity Area	<p>The Station Gateway Major Opportunity Area is focussed around the station in Stevenage and is outside the immediate setting of the Town Square Conservation Area and its associated heritage assets. Therefore, it is not considered a highly sensitive location. However, the wider town centre area is an intrinsic part of the setting of the central area, and the masterplanning itself is of historical interest.</p> <p>This should be taken into account as proposals are developed.</p> <p>We therefore welcome criteria ix and supporting text paragraphs 7.38A to 7.38F, which require that applications “celebrate the heritage of the town in the fabric, layout, and design of the Station Gateway.” We hope that this will lead to thoughtful designs that reflect the local character and history, ensuring that development enhances rather than diminishes the historical context of the area.</p> <p><u>Our recommendation</u></p> <p>None.</p>	Comments acknowledged and noted.	No change.

<p>High Street shopping Area</p>	<p>POLICY TC8: TOWN CENTRE SHOPPING AREA</p> <p>We object to the deletion of the final sentence of this policy, which states that redevelopment within the Town Centre Shopping Area will be permitted only if it does not harm the Town Square Conservation Area.</p> <p>We believe it is important to explicitly highlight that the Town Square is a Conservation Area to ensure that heritage considerations are factored into any decisions. Without this explicit reference, there is a risk that the impact on heritage assets might be overlooked or insufficiently considered during the planning process.</p> <p><u>Our recommendation</u></p> <p>The proposed change is unjustified, and the reference to the Town Square Conservation Area should be retained.</p> <p>The Regulation 18 consultation document clearly states that the scope of the review is limited to “<u>necessary changes only</u>, which are related to <u>key drivers of change</u> since the Plan was adopted in 2019”. However, no evidence has been provided to justify why this is considered a necessary change or to identify the specific key driver it pertains to.</p>	<p>Comments acknowledged and noted.</p> <p>This change to Policy TC8 is necessary for the reason that the existing text is contrary to national policy, which allows for harmful development subject to the appropriate public benefits test.</p> <p>An outright ban on harmful development, as the policy is currently worded, is therefore unjustified.</p> <p>As part of the review officers have sought to remove duplication of policy throughout the plan. The strategic heritage policy states the Council will assess planning permissions affecting the Stevenage heritage assets against national policies. In addition to this, the Councils detailed conservation policy states planning permission proposals should have regard to the Stevenage Conservation Area Management Plan.</p> <p>Further reference to the Town Centre Conservation Area can be found in the supporting text.</p>	<p>Updated subtext as follows:</p> <p>7.61A The town centre contains a number of listed buildings and a large part of it is also designated as a Conservation Area. Development in the town centre and its surroundings will be expected to preserve or enhance these heritage assets. Any proposals affecting heritage assets will be assessed against the relevant historic environment policies in this plan and the NPPF.</p>
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	<p>POLICY TC9: HIGH STREET SHOPPING AREA</p> <p>We object to the proposed deletion of criterion 'b', which states that permission will be granted only if it does not harm the significance of any designated heritage asset(s), including their setting.</p> <p>We believe it is important to highlight that the Town Square is a Conservation Area to ensure that heritage considerations are factored into any decisions. Without this explicit reference, there is a risk that the impact on heritage assets might be overlooked or insufficiently considered during the planning process.</p> <p><u>Our recommendation</u></p> <p>The proposed change is unjustified, and criterion 'b' should be retained. The Regulation 18 consultation document clearly states that the scope of the review is limited to "necessary changes only, which are related to key drivers of change since the Plan was adopted in 2019". However, no evidence has been provided to justify why this is considered a necessary change or to identify the specific key driver it pertains to.</p>	<p>Comments acknowledged and noted.</p> <p>This change to Policy TC9 is necessary because the existing text is contrary to national policy, which allows for harmful development subject to the appropriate public benefits test.</p> <p>As part of the review officers have sought to remove duplication of policy throughout the plan. The strategic heritage policy states the Council will assess planning permissions affecting the Stevenage heritage assets against national policies. In addition to this, the Councils detailed conservation policy states planning permission proposals should have regard to the Stevenage Conservation Area Management Plan.</p>	<p>Updated subtext as follows:</p> <p>7.64 Virtually all of the High Street lies within a Conservation Area and there are a number of Listed Buildings, together with buildings of local significance. Consequently, development will be expected to preserve or enhance these heritage assets. Any proposals affecting heritage assets will be assessed against the relevant historic environment policies in this plan and the NPPF.</p>

		Further reference to the Town Centre Conservation Area can be found in the supporting text.	
Other	<p>In preparation of the forthcoming Local Plan review, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.</p> <p>Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>	<p>Comments acknowledged and noted.</p> <p>The Council appreciates the position of HE and further advice and guidance. Comments put forward as part of this MoU will be taken into consideration as discussed accordingly.</p>	No change.

