

RAG Explanatory Note: Review of Stevenage Local Plan (2011 – 2031) Adopted 22 May 2019

What is a Local Plan?

1. All planning applications received must be determined in accordance with the development plan (eg the SBC Local Plan) unless material considerations indicate otherwise.
2. Whilst local plans largely cover a minimum 15 year period, individual policies can ‘age’ at different rates according to a range of circumstances. To ensure policies and the local plan as a whole, remain the effective starting point in the decision making process, we are required to formally review whether there is a need to update adopted local plan policies every 5 years.
3. There is no prescribed approach as to how local plan reviews are undertaken, so we have taken into account the following as advised by the NPPG:

- Conformity of the plan with national planning policy;
- Changes to local circumstances (particularly a significant change in Housing Need);
- Our Housing Delivery Test performance;
- Whether we can demonstrate a 5 year supply of deliverable sites for housing;
- Our appeals performance;
- Success of policies against indicators in the Development Plan as set out in the Authority Monitoring Report;
- Plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need; and
- Significant economic changes that may impact on viability

4. To appraise the current state and effectiveness of the Plan, our RAG review screened each policy against the current NPPF at the time (2023 version) and other relevant legislation, guidance or even Written Ministerial Statements since the Plan was adopted in 2019.
5. Each policy is R.A.G rated (red, amber or green) as to the amount of weight it should be afforded and whether it is sufficiently working with the objectives of the Plan. Should individual policies be considered ‘out of date’, this Local Plan Review does not introduce the corrective changes. It will consider the evidence and apply a proportionate scale of changes. Depending on the nature and scale of the issues, the RAG will enable the Council to apply changes appropriately, leading to partially updating the Local Plan (i.e changing a selection of policies), or a new Local Plan.

Considerations in the RAG

6. To ensure this Plan Review appraises the effectiveness of our Local Plan, Appendix 1 screens each policy against the current NPPF (2023) and other relevant legislation introduced since 2012. For the purposes of assessing future planning applications, each policy is R.A.G. rated (red, amber or green) as to the weight it should be afforded and whether other material considerations (ie the NPPF) should be given greater weight. Therefore, once considered against legislation or guidance, the policy will be rated as to whether it needs to be updated now, or in a New Local Plan.
7. Should individual policies be deemed ‘out of date’, this Local Plan Review does not introduce the corrective changes. Depending on the nature and scale of the issues

identified it may be appropriate to partially update our Local Plan (ie changing a limited set of policies) or ultimately prepare an entirely new Local Plan. Either process would need to be completed in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and would necessitate publishing a timetable ('Local Development Scheme') setting out the planned completion of those formal regulatory milestone stages (eg Regulation 18 and 19 draft stages, examination and finally adoption) through which those corrective changes are then made.

Conformity of the plan with national planning policy.

8. Our adopted Local Plan was prepared in conformity with the first edition of the NPPF (2012). Since adoption, the NPPF was formally updated in 2018, 2019, 2021 and 2023. The NPPG has similarly been revised and updated.

Considerations to take account within the RAG

Sustainable Development

The NPPF at paragraph 11 now provides greater clarity as to what constitutes 'sustainable development' for both plan making and decision taking. Policy SP1 details our policy regarding the "presumption in favour of sustainable development" as it was at the time of our Plan's adoption. It was based on the Planning Inspectorate's 'model policy' who advocated its use in all local plans prepared at that time. This approach is now out of line with the current NPPF and is therefore no longer up to date. It is suggested that Policy SP1 should no longer be used and therefore could be removed as part of any future update.

Use Classes

The Town and Country Planning (Use Classes) Order categorises all uses of land and buildings into various 'Use Classes'. In some instances, the Order permits changes of use from one Use Class to another without the need for planning permission (known as 'permitted development rights'). For Local Plans such as ours, Use Classes are applied in policies to regulate those uses and types of development that can take place within specific areas (such as within defined employment areas and town centres). In 2020, the categories were significantly changed (alongside some of the wider permitted development rights). This specifically affects Employment Areas such as EC1, Primary Shopping Areas and Frontages TC8 to TC10 and District and Local Centres. Whilst the integrity of those policies are considered to remain largely sound and consistent with national policy, for the purposes of decision making, account should now be made to these new Use Classes Order and the new permitted changes of use.

Changes in Design codes

Local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Policy GD1 is the principal policy for good design which on balance, remains largely fit for purpose. That said, working with local communities, to ensure good design principles are used. This will be assisted by the Council's Design Guidance SPD, which will be updated as part of the review process.

Economy

Employment policies remain sound but apply caution: Trends in the delivery (take-up) of employment land, economic changes and market indicators suggest that EC1 remains an effective approach to meeting identified needs for economic growth in Stevenage.

The supply of employment land should continue to be monitored on an ongoing basis to ensure sufficient supply is maintained and will be reflected in the findings of the emerging Employment Technical Paper.

Green Infrastructure / BNG / Nature recovery

Para 181 (NPPF 2023) further says that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. This at present is not a driver for change in the partial update but will need to be considered in a New Local Plan to take account changes in BNG and the Local Nature Recovery Strategies.

Town centres

The retail market is challenging due to several factors (including the rise of online sales) which will continue to affect many retailers. These conditions result in a volatile environment for the retail sector, which will nonetheless continue to provide some opportunities. With the benefit of Town Deal funding, a series of town centre enhancements have been delivered and are being actively developed in line with the objectives set out in the Regeneration Strategy and Station Gateway Area Action Plan. The policy remains broadly consistent with the NPPF and both Councils' current objectives for supporting appropriate uses but caution needs to be applied based on the amendments to the Use Classes Order and new permitted changes – these will need to be reflected within future iterations of the Plan. An update to the Retail Study (2014) to check what proportionate changes can be implemented in the Partial Update and what can be left for a New Local Plan.

9. The RAG will also look at policies in regard to the Local Plan Objectives. These will need to be maintained, otherwise policies could be deemed unsound.
10. The Local Plan (2019) Objectives:

- Physical, social and economic regeneration throughout the town, including the Town Centre.
- Deliver new homes with new neighbourhoods
- Local facilities to be regenerated in the neighbourhoods
- Provision of leisure and community facilities , including education provision
- Infrastructure provision (transport, education, sports, community etc)
- Employment growth and opportunity for business
- Old and New Town High Street protection and enhancement
- High standards of design and sustainability
- Green Space / infrastructure enhancement and protection
- Protecting and enhancing the environment / heritage assets / water courses
- Physical, social and economic regeneration throughout the town, including the Town Centre.
- Employment growth and opportunity for business
- Old and New Town High Street protection and enhancement
- High standards of design and sustainability

The conclusions from the R.A.G review led to the decision to partially update the Plan and update other areas in a new Local Plan from 2026 onwards.