

Regulation 22 Consultation Statement

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1 Introduction

- 1.1 This statement details the consultation processes undertaken at various stages, whilst preparing the Local Plan. It says who we consulted and when this happened, it summarises the responses that were sent to us, and, where relevant, it also says how we have changed our document as a result of these comments.
- **1.2** This statement has been prepared to meet the requirements of Regulation 22 of the Town and Country Planning (Local Plan) (England) Regulations 2012. It will be submitted alongside the Local Plan to the Secretary of State.
- **1.3** The Council's Statement of Community Involvement (SCI) has been followed at all stages of Local Plan preparation. This says which groups and organisations we will consult and how we will involve members of the public in our planning documents.
- **1.4** 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 people:
- Placing hard copies of the plans at our offices, in local libraries and on our website.
- Writing to people who have told us they are interested in our planning documents.
- Putting adverts in the local newspaper.
- Sending out leaflets and brochures.
- Setting up exhibitions or displays and holding meetings.
- Giving presentations and hosting workshops.
- 1.5 We have carried out four consultations to help us meet the requirements of the Regulations and the Duty to Co-operate, to encourage public involvement in plan preparation:
- A targeted consultation with other local authorities and Duty to Co-operate bodies was held between December 2012 and January 2013;
- The first public consultation on the new local plan was held between June and July 2013 (Regulation 18);
- A further public consultation on housing targets was held between June and July 2015 (Regulation 18 Part 2).
- A publication version consultation was held between January and February 2016 (Regulation 19).
- **1.6** The following sections of this statement detail who was consulted, how the consultation was carried out, the results of the consultation and how these have been taken into account (where necessary), for the Regulation 18 and 19 consultations.

Introduction

- 1.7 Separate consultation statements provide more details on the initial consultation stages⁽¹⁾.
- **1.8** In addition to the consultations above, we have also carried out comprehensive ongoing formal and informal Duty to Co-operate discussions with various organisations and stakeholders, which has helped to inform the preparation of the plan. The Duty to Co-operate says we must work with other councils and certain named organisations when we are writing our plans⁽²⁾.
- **1.9** Our Duty to Co-operate Statement shows we have met the requirements of the Duty to Co-operate in more detail.
- **1.10** The following sections of this statement say who we consulted and why and when this happened.

Local plan - early stage consultation: Statement of consultation (SBC, 2013); Stevenage Borough Local Plan 2011-2031 First Consultation - Statement of Consultation (SBC, 2014); Stevenage Borough Local Plan 2011-2031 Revised Housing Targets Consultation June 2015 - Statement of Consultation (SBC, 2015)

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

2 Regulation 18

First Local Plan consultation (Regulation 18)

- 2.1 The consultation was approved by the Council's Executive on Tuesday 28 May 2013. This recommendation was considered by the Council's Overview and Scrutiny Committee on Monday 3 June 2013.
- 2.2 The first consultation on the local plan started on Tuesday 11 June 2013. The consultation was open for six weeks. It ended on Monday 22 July 2013.
- 2.3 The consultation was publicised by a range of measures, including:
- 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.
- Placing prominent adverts in The Comet on 20 June and 18 July 2013;
- Issuing press releases which resulted in articles in The Herts Advertiser and The Comet on 3 July and 4 July 2013 respectively;
- Announcing the consultation on the Council's Facebook page and Twitter feed;
- Sending a summary leaflet to every residential and business address in the Borough; and
- Holding a series of targeted presentation sessions with the Council's Older Persons Forum (June 13), the local business community (June 18) and the Youth Council (June 26)
- 2.4 A selection of the consultation materials are shown in Appendix 1.
- 2.5 Appendix 2 sets out the bodies and persons specifically invited to make representations as part of the Local Plan consultations.

Responses received

- **2.6** A total of **188 responses** were received to the consultation.
- **2.7** 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.
- **2.8** Each representation has been assigned to the most relevant question or section of the document. A total of **940 representations** have been identified.
- 2.9 The next section contains more detailed analysis of these results.
- **2.10** Of the 188 responses that we received:
- 132 were from members of the public (making 521 representations). Of these:
 - 57 were from Stevenage residents (349 representations)

- 47 were from residents of Aston (74 representations); and
- 28 were from other locations or unknown (98 representations);
- 23 were from businesses or landowners (174 representations); while
- 33 were from organisations such as parish councils or special interest groups (245 representations).
- **2.11** Responses were received from both North Hertfordshire District Council and East Hertfordshire District Council, the two local authorities adjacent to the Borough.
- **2.12** Five of the nine Parish Councils which share a border with Stevenage responded to the consultation.
- **2.13** A full list of respondents is contained in Appendix 3.

Summary of responses to issues and options

- **2.14** The consultation contained 29 specific issues and questions. A number of these contained options which respondents could choose from. Where appropriate, the Council said which option was its preferred approach (shown **bold** in each of the issues below).
- **2.15** All responses to the consultation were analysed by the Council's planning officers. Representations were recorded against sections, questions or options were this was clearly stated by the respondent or officers were able to reasonably infer this information.
- **2.16** 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".

- **2.17** This would have been recorded as a response under Issue 9 (Housing Target) and support for Option A (urban capacity).
- **2.18** A count of the representations received to some of the key questions or sections of the document are set out below. A table setting out a summary of the main issues raised, and our response to these, is contained in Appendix 4.

Issue 5: The relationship between homes and jobs

- a. Prioritise jobs over homes and / or seek higher levels of self-containment
- b. Seek a reasonable balance between new homes and jobs
- c. Prioritise new homes over jobs and / or seek lower levels of self-containment
- Number of respondents: 30 (16% response)
- Number of representations: 30 (3% of representations)
- 2 respondents (7%) supported option a.

- 16 respondents (53%) supported option b.
- 2 respondents (7%) supported option c.
- 10 respondents (33%) did not express a clear view or made other comments.

Issue 6: Skills

- a. Allow the free market to decide what types of jobs are provided in Stevenage
- b. Focus on highly-skilled and professional jobs
- c. Make sure we provide an appropriate range of jobs to meet the rising skill levels of all residents
- Number of respondents: 28 (15% response)
- Number of representations: 29 (3% of representations)
- 7 respondents (25%) supported option a.
- 0 respondents (0%) supported option b.
- 9 respondents (32%) supported option c.
- 12 respondents (43%) did not express a clear view or made other comments.

Issue 7 - The town centre, the Old Town and the retail warehouses

- a. Allocate all of the predicted new comparison floorspace to the town centre, replace existing small shop units with larger units (especially in places like Park Place and the area of the bus station) and improve the shopping streets and car parks.
- b. Split the predicted new comparison floorspace between the town centre, the Old Town High Street and the retail warehouses.
- c. Allocate all of the predicted new comparison floorspace to the retail warehouses, either through allowing new units to be built or existing units to be extended
- Number of respondents: 32 (17% response)
- Number of representations: 36 (4% of representations)
- 7 respondents (22%) supported option a.
- 1 respondent (3%) supported a combination of option a and option b.
- 0 respondents (0%) supported option c.
- 24 respondents (75%) did not express a clear view or made other comments.
- See Appendix 3 for a summary of the main issues raised in respondents' written comments.

Issue 9: Borough housing target

| Option | Number of homes 2011-31 | |
|---------------------|-------------------------|-------------------|
| | Total* | Average per year* |
| a: Urban capacity | 2,800 | 140 |
| b: Borough capacity | 5,300 | 265 |
| c: Population led | 6,600 | 330 |

^{*} These targets could go up, down or stay the same when the next plan is produced. This depends on the findings of our evidence and / or new information being made available.

- Number of respondents: 99 (53% response)
- Number of representations: 114 (12% of representations)
- 47 respondents (47%) supported option a.
 - Of these, 4 respondents (4%) would support a modified option b which excluded development to the north of Stevenage on land known locally as 'Forster Country'.
- 26 respondents (26%) supported option b.
- 5 respondents (5%) supported option c.
- 21 respondents (21%) did not express a clear view or made other comments.

Issue 10: Gunnels Wood

- a. Continue with a very open policy approach
- b. Identify specific areas for specific uses
- c. Allow a range of job-creating uses in addition to traditional employment uses
- d. Allow a specified part of the area to be redeveloped from employment use to housing
- Number of respondents: 14 (7% response)
- Number of representations: 14 (1% of representations)
- 3 respondents (21%) supported option a
- 2 respondents (14%) supported option b
- 4 respondents (28%) supported option c
- 1 respondent (7%) supported option d
- 4 respondents (28%) supported a combination of more than one option

Issue 11: Pin Green

- a. Continue with a very open policy approach
- b. Identify the area for specific uses
- c. Allow a range of job-creating uses in addition to traditional employment uses
- d. Allow a specified part of the area to be redeveloped from employment use to housing
- Number of respondents: 8 (4% response)
- Number of representations: 8 (1% of representations)
- 1 respondent (13%) supported option a
- 3 respondents (38%) supported option b
- 0 respondents (0%) supported option c
- 1 respondent (13%) supported option d
- 2 respondents (25%) supported a combination of more than one option
- 1 respondent (13%) did not express a clear choice or made other comments.

Issue 12 - New employment land

- a. Work with North Hertfordshire District Council to deliver a new 30 hectare (ha) employment site at Junction 7 of the A1(M)
- b. Safeguard or allocate around 6 ha of land to the west of North Road
- c. Safeguard or allocate up to 10 ha of land to the east of North Road as part of a new neighbourhood
- d. Safeguard or allocate around 7 ha of land to the north of Stevenage Road
- e. Safeguard or allocate around 7 ha of land to the west and south-west of Junction 8
- f. Safeguard or allocate up to 10ha of land to the west of the A1(M) as part of a new neighbourhood
- g. Do not safeguard or allocate any new employment land
- Number of respondents: 39 (21% response)
- Number of representations: 41 (4% of representations)
- 4 respondents (10%) supported option a
- 3 respondents (8%) supported option b
- 1 respondent (3%) supported option c
- 3 respondents (8%) supported option d
- 4 respondents (10%) supported option e
- 5 respondents (13%) supported option f

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- 4 respondents (10%) supported option g
- 24 respondents (62%) did not express a clear choice or made other comments.
- Totals will sum to more than 100% as people could select more than one site / area

Issue 14: A new foodstore

- a. Identify two or more neighbourhood centres to be redeveloped with new foodstores.
- b. Identify a completely new site for a large foodstore.
- c. Allow extensions to existing large foodstores and/or neighbourhood centre shops.
- Number of respondents: 19 (10%)
- Number of representations: 20 (2%)
- 1 respondent (5%) supported option a
- 0 respondents (0%) supported option b
- 8 respondents (42%) supported option c
- 10 respondents (53%) did not express a clear choice or made other comments

Issue 15: Passenger transport, walking and cycling

- a. Provide new or improved bus services
- b. Encourage more flexible working and home-working
- c. Improve pedestrian and cycle facilities
- d. Do all of the above where practicable
- Number of respondents: 24 (13%)
- Number of representations: 25 (3%)
- 0 respondents (0%) supported option a
- 3 respondents (13%) supported option b
- 0 respondents (0%) supported option c
- 11 respondents (46%) supported option d
- 10 respondents (42%) did not express a clear choice or made other comments

Issue 17: House conversions

- a. Permit the conversion of houses into flats in all circumstances.
- b. Only permit conversions when existing and potential residents are not adversely affected.
- c. Do not permit any further conversions of houses into flats.
- Number of respondents: 11 (61%)
- Number of representations: 11 (1%)
- 0 respondents (0%) supported option a
- 8 respondents (73%) supported option b
- 1 respondent (9%) supported option c
- 2 respondents (18%) did not express a clear choice or made other comments.

Issue 18: Affordable housing

- a. Set targets that require up to 40% affordable housing on qualifying sites
- b. Set targets that are higher than Option a
- c. Set targets that are lower than Option a
- Number of respondents: 19 (10%)
- Number of representations: 19 (2%)
- 7 respondents (37%) supported option a
- 0 respondents (0%) supported option b
- 7 respondents (37%) supported option c
- 5 respondents (26%) did not express a clear choice or made other comments

Issue 19: Housing mix

- a. Build 60% one- and two-bedroom homes; 40% large family homes.
- b. Focus on building large family homes.
- c. Focus on building one- and two-bedroom flats and houses for first time buyers.
- Number of respondents: 24 (13%)
- Number of representations: 24 (3%)

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- 8 respondents (33%) supported option a
- 0 respondents (0%) supported option b
- 1 respondent (4%) supported option c
- 15 respondents (63%) did not express a clear choice or made other comments

Issue 20: Gypsies and Travellers

- a. Extend the existing site at Dyes Lane
- b. Identify a new site probably near to Junction 8 of the A1(M)*
- c. Identify a new site elsewhere*
- * These options will only be pursued if our evidence clearly shows a new site is needed.
- Number of respondents: 17 (9%)
- Number of representations: 17 (2%)
- 8 respondents (47%) supported option a
- 0 respondents (0%) supported option b
- 1 respondent (6%) supported option c
- 8 respondents (47%) did not express a clear choice or made other comments

Issue 22: Neighbourhood centres and facilities

- a. Keep the existing neighbourhood centre designations
- b. Make changes to the designations that reflect the current nature of our centres and their facilities
- c. Allow for more flexibility and let the market decide what to provide
- Number of respondents: 12 (6%)
- Number of representations: 13 (1%)
- 1 respondent (8%) supported option a
- 1 respondent (8%) supported option b
- 5 respondents (42%) supported option c
- 5 respondents (42%) did not express a clear choice or made other comments

Issue 23: The Lister Hospital

- a. Do not identify land for the future expansion of the hospital.
- b. Safeguard land to the north of the Lister Hospital for future expansion.
- Number of respondents: 26 (14%)
- Number of representations: 27 (3%)
- 0 respondents (0%) supported option a
- 17 respondents (65%) supported option b
- 9 respondents (35%) did not express a clear choice or made other comments

Issue 26: Green Belt

- a. Give priority to maintaining the full current extent of the Green Belt within Stevenage Borough and do not attempt to fully meet the objectively assessed needs of the Borough.
- b. Give priority to fully meeting the objectively assessed needs of Stevenage Borough to 2031 and pursue the rolling back of the inner Green Belt boundary (i.e. releasing land from the Green Belt) to allow development to happen.
- c. Give priority to fully meeting the objectively assessed needs of the Borough to 2031 and beyond. Pursue the rolling back of the inner Green Belt boundary (i.e. releasing land from the Green Belt) and seek the identification of 'safeguarded land' for future development in neighbouring council areas.
- Number of respondents: 113 (60%)
- Number of representations: 125 (13%)
- 32 respondents (28%) supported option a
- 5 respondents (4%) supported option b
- 6 respondents (5%) supported option c
- 70 respondents (62%) did not express a clear choice or made other comments

Issue 28: Open space designations

- a. Carry forward the District Plan allocations unchanged
- b. Designate two new Green Lungs and extend protection to allotments
- c. As option b, but also protect smaller areas of open space

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- Number of respondents: 33 (18%)Number of representations: 38 (4%)
- 0 respondents (0%) supported option a
- 1 respondent (3%) supported option b
- 5 respondents (15%) supported option c
- 27 respondents (82%) did not express a clear choice or made other comments

Issue 29: Heritage assets

- a. Include local policies to help determine applications that affect heritage assets
- b. Do not include local policies and rely instead upon national guidance and legislation
- Number of respondents: 16 (9%)
- Number of representations: 16 (2%)
- 4 respondents (25%) supported option a
- 3 respondents (19%) supported option b
- 9 respondents (56%) did not express a clear choice or made other comments

Summary of other responses

2.19 A number of additional comments were made against other sections or topics within the document. These could not be directly attributed to any of the questions above. A count of these is provided below. A summary of the main issues raised is included in Appendix 4.

| Chapter / section | Number of respondents (% of all respondents) | Number of representations (% of all representations) |
|---|--|--|
| Chapter 1: Introduction | 3 (2%) | 3 (less than 1%) |
| Chapter 2: Strategic Context | 2 (1%) | 2 (less than 1%) |
| Chapter 5: Strategic Policies | 6 (3%) | 6 (less than 1%) |
| Chapter 8: Transport and Infrastructure | 37 (20%) | 44 (5%) |
| Chapter 10: Good Design | 1 (less than 1%) | 1 (less than 1%) |
| Chapter 13: Climate change and flooding | 10 (5%) | 10 (1%) |
| Chapter 14: The Natural Environment | 2 (1%) | 2 (less than 1%) |
| Chapter 16: Monitoring and Delivery | 5 (3%) | 5 (less than 1%) |

| Chapter / section | Number of respondents (% of all respondents) | Number of representations (% of all representations) |
|---|--|--|
| Other general or miscellaneous comments | 14 (7%) | 15 (2%) |

Housing Targets consultation (Regulation 18, Part 2)

- 2.20 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.
- **2.21** 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.
- **2.22** The consultation was publicised by a range of measures, including:
- 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)
- 2.23 A selection of the consultation materials are shown in Appendix 1.
- 2.24 Appendix 2 sets out the bodies and persons specifically invited to make representations as part of the Local Plan consultations.

Responses received

- **2.25** A total of **81 responses** were received to the consultation.
- 2.26 A response can contain more than one representation. A representation is each different comment that is made in a response. A total of **169 representations** were identified.
- **2.27** 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.
- 2.28 Responses were received from both North Hertfordshire District Council and East Hertfordshire District Council, the two local authorities adjacent to the Borough.
- **2.29** Three of the nine Parish Councils which share a border with Stevenage responded to the consultation.
- **2.30** A full list of respondents is contained in Appendix 3.

2.31 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.

Issue 1: Revised Borough housing target options

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

- **2.32** A total of **80 representations** were made or recorded against the Borough Housing Target chapter of the document 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.

Issue 2: The Green Belt

- a. Maintain the Green Belt
- b. Release land within the Borough for the period to 2031 only
- c. 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.
- **2.33** A total of **75 representations** were made or recorded against the Green Belt chapter of the document 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.
- 2.34 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.
- **2.35** A summary of the main issues raised, along with the Council's response, is contained in Appendix 5.

When was this consultation?

- **3.1** The consultation was approved by the Council's Executive on Tuesday 15 December 2015. This recommendation was considered by the Council's Overview and Scrutiny Committee on Wednesday 16 December 2015.
- 3.2 The Publication consultation started on Wednesday 6 January 2016. The consultation was open for six weeks. It ended on Wednesday 17 February 2016.

What did we do?

- 3.3 The Publication 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;
- 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;
- Distributing a summary leaflet to all addresses within the Borough and providing this on our website;
- Placing adverts in the local press Hertfordshire Mercury (7 January 2016) and The Comet (11 February 2016). Plus an online advertisement on the Comet homepage from 1 – 17 February, with a link directly to the Local Plan webpage;
- 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 Wednesday 9 December (midweek paper edition) and online;
- Announcing the consultation on the Council's Facebook page and Twitter feed, and posting reminders each week;
- Putting up posters in the community centres across the town, the museum, the indoor market and all secondary schools;
- Presenting at the School's Parliament on Monday 11 January 2016;
- Presenting at the Old Stevenage Residents Meeting on 15 February 2016;
- Holding a drop-in session on Monday 8 February (11am to 3pm) at the council offices.
- 3.4 A selection of the consultation materials are shown in Appendix 1.
- 3.5 Appendix 2 sets out the bodies and persons specifically invited to make representations as part of the Local Plan consultations.

Who responded to the consultation?

- **3.6** A total of **603 responses** were received to the consultation.
- **3.7** A response can contain more than one representation. A representation is each different comment that is made in a response. A total of **1,781 representations** have been identified.

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

Number of responses

- **3.9** Of the 603 responses that we received:
- 532 were from members of the public. Of these, 246 (just under 50%) had a Stevenage address; while
- 71 were from businesses or organisations, such as parish councils or special interest groups.
- **3.10** Responses were received from both North Hertfordshire District Council and East Hertfordshire District Council, the two local authorities adjacent to the Borough.
- **3.11** Three of the nine Parish Councils which share a border with Stevenage responded to the consultation.
- **3.12** A full list of respondents is contained in Appendix 3.

Summary of responses to the Publication consultation

- 3.13 In terms of the tests of soundess and the legal, procedural and Duty to Co-operate requirements:
- 777 representations say the Plan is unsound;
- 527 representations say that the Local Plan has not met the legal requirements;
- 517 representations say that the Plan has not met the procedural requirements;
- 487 representations say that the plan has failed the Duty to Co-operate.
- **3.14** Of those 777 representations that say the Plan has failed one or more of the tests of soundness:
- 509 say the plan is not positively prepared;
- 635 say the Plan is not justified;
- 603 say the Plan is not effective;
- 580 say the Plan is inconsistent with national policy.
- **3.15** The largest number of objections was made against the housing policies, particularly the proposed new neighbourhood at North Stevenage and the Gypsy and Traveller site allocation north of Graveley Road. The release of Green Belt land more generally was also an issue that many people objected to.
- **3.16** A significant number of concerns were also raised about the delivery of the plan / infrastructure issues, some of the proposed employment sites, and flood risk issues.
- **3.17** We received support for many policies, and for the Plan as a whole, from various different sources.
- **3.18** Some of the key objections include:

- Further consideration should be given to potential alternative housing sites including previously developed land within the existing urban area and developing over the town's parks and recreation grounds;
- Future housing needs do not represent the exceptional circumstances required to roll-back the Green Belt;
- Local infrastructure will not cope with additional development;
- No development should take place on land to the north, known locally as Forster Country;
- Stevenage has fulfilled the purposes of the original masterplan(s) for the town and should not continue to grow;
- Stevenage should work with other authorities to promote a New Town outside the Green Belt (probably in North Herts or South Cambridgeshire Districts, between Baldock and Royston) to meet our housing needs, as an alternate to Green Belt release;
- An expansion of Dyes Lane should accommodate future Gypsy and Traveller provision;
- Land should be safeguarded for hospital expansion;
- The evidence used to support the preferred approach was flawed; and
- The release of Green Belt would result in the merging of surrounding villages and / or be inconsistent with the Government's stated purposes of Green Belt.
- **3.19** A full summary of responses relating to each policy / section of the Plan is set out below:

The consultation process

| Section / Policy | Summary of responses |
|----------------------|--|
| Consultation process | More public events required. Representation forms too complex and not advertised. Support for online documents. Leaflets not received / inaccurate / not detailed enough. Website not working. Consultation too short. North Hertfordshire's proposals are not shown. Consultation portal hard to use. Unreasonable and discriminatory to consult on a 200 page document. Lacking a full Proposals Map. Support for leaflet. Residents outside the boundary not consulted. |

General comments

| Section / Policy | Summary of responses |
|------------------------------------|---|
| General comments on the Local Plan | No named authors. Lacks deeper thought and broad vision. Plan is too grandiose. Impact outside Stevenage not considered. Object to any loss of countryside. Missing key demographic information. Welcome support for schemes beyond the boundary. Lacking facts. Infrastructure / delivery concerns. Not ambitious enough. Object to any growth. Should be sympathetic to original New Town ideals. Welcome plans to maintain / improve quality of life. Language suggests proposals are a fait accompli. Welcome constructive working with neighbouring authorities. Co-operation with neighbouring authorities has not taken place. |

Introduction, strategic context and vision

| Section / Policy | Summary of responses |
|------------------------------|---|
| Introduction | Contrary to NPPF - Green Belt and historic assets not being protected, and unsustainable. Object to conclusions of the HRA Screening Report. SA has not properly assessed some significant aspects of development. Facts are incorrect. Further data sources should be used. Provisions for reviewing, changing and ending the plan should be included. |
| Vision and Objectives | Support a creative and innovative vision. Reads as a marketing document rather than a considered plan. Vision is modern and will attract more visitors. Phraseology is misleading. Support proposals to raise quality of life. |
| Strategic planning / context | Concerns around infrastructure / deliverability. Views of neighbouring authorities should be included. Misleading - SBC are not protecting Green Belt. Further data sources should be used. Concerns around housing target. Welcome up-to-date plan. Further work required around employment provision in other authority areas. Support cross-boundary co-operation. Joint working not demonstrated. Water Framework Directive must be reflected. Wymondly neighbourhood plan should be considered. No mention of how Sustainable Community Strategy has been fulfilled. Must be inclusive and involve those already working towards the Plan's strategic goals. |

| Section / Policy | Summary of responses |
|--------------------|--|
| Strategic Policies | Support meeting and exceeding OAN within the boundary. Support the positive and pro-active approach towards development and regeneration. Support the commitment to protect and enhance employment areas, retail and community facilities, and improve public transport and road networks. Support plans to ensure the hospital has the flexibility to expand. Evidence studies have been prepared using accepted methodologies. All alternatives have been explored. Detailed policies provide clear guidance for developers. Believe SBC wish to become a unitary authority. Object to population increase. Infrastructure concerns. |

Sustainable Development

| Section / Policy | Summary of responses |
|--|--|
| Sustainable Development (general comments) | No firm plans to address many aspects of sustainability. SA has had minimal impact / is not objective. Major restraint of growth is water supply. |
| Policy SP1: Presumption in favour of sustainable development | Building on Forster Country is not sustainable. More commuting is not sustainable. Sustainable locations for housing should be used first. Welcome emphasis on passenger transport. |
| Policy SP2: Sustainable Development in Stevenage | Plan should comply with NPPF - no Green Belt release. Concerns relating to consequential impacts of climate change and water supply. Housing will be for commuters, not Stevenage. There is scope to build upwards in the centre, rather than on Green Belt. Should include landscape and creation of habitat corridors. Use of SUDS (including green/brown roofs) should be added. Plan proposals do not align with these criteria. Support aspirations to support a balanced community. Support delivery of new homes and jobs. Support aims to raise aspirations / quality of life. More emphasis on design required. |

Economy

3.20 Strategic policy / general comments

| Section / Policy | Summary of responses |
|--|--|
| Policy SP3: A strong, competitive economy and general comments | Businesses should be encouraged to expand or relocate to the town centre. Neighbouring authority willing to contribute to unmet need. Further joint working required. Providing employment outside the Borough is not sustainable. No long-term strategic thinking. Mindless 'build it and they will come' plan for industrial areas. Not enough jobs being provided. Support new town centre offices. Stevenage is becoming a commuter town. Apprenticeships, and similar, should be encouraged. Object to evidence base. An Article 4 designation would help maintain control over employment sites. Agree the town lacks a gateway from the A1(M). Stop conversions of employment sites to housing. Definition of employment should be expanded to include all employment generating uses. |

3.21 Employment land allocations

| Section / Policy | Summary of responses |
|---------------------|--|
| General | Object to providing more employment land / jobs. Why is more employment needed when existing is being converted to residential / is unused. Elaborate on each site and the opportunities presented. Support for all allocated sites. Concerns around the impact of development to the north. Gunnels Wood should be returned to full use for employment. |
| EC1/1 | Should refer to 'Stevenage GSK and Bioscience Catalyst Campus'. Potential to accommodate a higher level of floorspace. Concerns only B1(b) is allowed. |
| EC1/4 | Will limit expansion of Lister Hospital. Flood risk concerns. Landowner not adverse to employment use, but is also being considered for Starter Homes. North Road cannot support more development. Site is too small. Concerns around traffic impacts. Impact on wildlife must be considered. |
| EC1/6 | General support. Should provide greater clarity - i.e. locational arrangements. |

| Section / Policy | Summary of responses |
|---------------------|--|
| EC1/7 | General objection. Object to removal from the Green Belt. Sets a precedent for the spread of development westwards. Concerns around impacts on villages. Concerns around flood risk. Concerns aorund impact on adjacent Wildlife Site. Site is physically seperated from Stevenage by J8 of the A1(M). Does not follow conclusions of Green Belt Review. Site is not considered in traffic modelling or FRA work. Concerns around traffic impacts. Access is not suitable - particularly for HGVs. Landowner support. Scope to improve traffic flows and ease congestion at J8. Site is in a sustaianble location. A FRA shows development can take place. Support Green Belt release. |

3.22 Existing employment sites

| Section / Policy | Summary of responses |
|--|--|
| Gunnels Wood (including Policies EC2, EC3 & EC4) | Object to the encouragement of non-employment uses in the most accessible part of Gunnels Wood. General support for Gunnels Wood policies. Concerned second part of EC4 could prejudice existing properties. |
| Pin Green (Policy EC6) | Support an appropriate range of premises across the area. |

<u>Retail</u>

| Section / Policy | Summary of responses | |
|--|---|--|
| Support 3,000 new homes. Ignores trends in the retail sector. Object to high rise buildings. Concerns around deliverability / funding. General support for regeneration. Other improvements suggested. Object to demolition of well-used facilities. Concerns around traffic congestion / parking. Should not be encouraging commuters. Object to loss of commercial uses. Support retail floorspace requirements. Support network of existing centres / stores. Encourage a mix of shops. Retail parks and the town centre can co-exist. Support for retail in new settlements. High quality design is crucial. Object to new homes in the town centre. Concerns around impacts on other towns. Affordable homes target could be exceeded in town centre. Plans should include the shopping area. | | |
| TC1: Town Centre | Town Centre boundary should be extended. | |
| Policy TC2: Southgate Park Major Opportunity Area | Lytton Way closure will cause congestion. Support for public sector hub. Landowner support. Support provision of a Primary School. Public sector hub should include museum, library, healthcare uses. | |
| Policy TC3: Centre West Major Opportunity Area | Leisure Park is well used - redevelopment unnecessary Object to loss of leisure facilities. Concerns around loss of parking. Other parts of the town centre should be prioritised. Landowner support. Support improvements to bus and rail stations/services. | |
| Policy TC4: Station Gateway Major Opportunity Area | Object to railway station proposals. Object to demolition of Arts and Leisure centre. Relocating bus station does not justify costs. Support loss of Lytton Way. Support demolition of Arts and Leisure centre. A new theatre must be provided. Support railway station proposals. Welcome easier access for pedestrians. Support level of retail provision. Concerns around parking. Concerns around funding for infrastructure provision. | |
| Policy TC5: Central Core Major Opportunity Area | Heritage assets should be retained. General support. | |

| Section / Policy | Summary of responses | |
|--|--|--|
| Policy TC6: Northgate Major Opportunity Area | Support level of retail floorspace proposed. | |
| Policy TC7: Marshgate Major Opportunity Area | Support level of retail floorspace proposed. Should seek to retain youth facilities. | |
| Policy TC8: Town Centre Shopping Area | Primary and secondary frontages should be extended. Should support linked trips to retail parks. Concerned about negative approach to retail parks. | |
| Policy TC9: High Street Shopping Area | Welcome plans to protect the Old Town. Too many food outlets. Mixed use is being eroded. Strengthen protection of heritage assets. High-rise buildings should be prevented. Original windows and shop fronts should be protected. | |
| Policy TC10: High Street Primary and Secondary Frontages | Support for limit on A5 uses. Evidence supports this. Should use the character of the Old Town to attract specialist retailers. Object to ban on A5 uses. Lack of evidence. Restrictions should also be adopted in other areas. | |
| Policy TC11: New Convenience Retail Provision | Object to loss of existing uses. No need for another supermarket. Object to loss of Green Belt. Concerns around traffic impacts. Use the site for new homes / healthcare instead. Concerns around flood risk. Landowner / leaseholder support for allocation. Concerns around impacts on villages. | |
| Policy TC13: Retail impact assessments | Thresholds should be increased. Further clarity required for new settlements. Support the thresholds used. | |

<u>Infrastructure</u>

3.23 Strategic policy / general comments

| Section / Policy | | Summary of responses |
|---|-------|--|
| SP5: Infrastructure and general comments | Roads | Impact of congestion on villages / surrounding area. Accidents will increase. Concerns around Lytton Way proposals. Support Lytton Way proposals. Planned A1(M) improvements are not enough. Roads cannot be improved. |
| | Rail | Rail improvements will not increase capacity. An additional station is required. |

| Section / Policy | Summary of responses |
|------------------|--|
| Utilities | Concerns around wastewater capacity. Household Waste and Recycling Centre will require additional provision. Developments should not result in adverse impacts on the sewerage network. |
| Other | General support for infrastructure policies. Infrastructure must be delivered before new development. Insufficient evidence / modelling carried out. General concerns about lack of infrastructure. Further details about mitigation, costs, timescales and sources of funding required. Not enough work done with other authorities. Improvements required to infrastructure outside the boundary have been ignored. Support co-operation with other authorities. Improvements will encourage investment. Support approach to sports facilities provision. The various shopping centres in the town should be linked i.e. by tram. A new local reservoir should be included. Alternative forms of passenger transport should be considered. Some development locations are unsustainable. |

3.24 Infrastructure and developer requirements

| Section / Policy | Summary of responses |
|---|--|
| Policy IT1: Strategic development access points | Object to references to speculative proposals outside the boundary. Increased traffic not been fully considered. Support access points for Stevenage West. Object to new access points off North Road. Support for North Stevenage access. Concerns around Meadway proposals. |
| Policy IT2: West of Stevenage safeguarded corridors | Object to references to speculative proposals outside the boundary. Proposed scheme destroys Green Belt. Support access arrangements. Landowner objection. Land should be allocated for housing. Site cannot be developed without the prior permission of the Wymondly Neighbourhood Plan. |
| Policy IT3: Infrastructure | General support. Need to clarify what constitutes a significant development. Infrastructure assessments not taken into account in Viability Study. Sites outside of the Borough should be referenced. |
| IT5: Parking and access | General objection to the parking standards. New homes should have at least one space. Adequate parking must be provided for facilities/services. |

3.25 Sustainable Transport

| Section / Policy | Summary of responses | |
|---|--|--|
| Policy SP6: Sustainable transport and general comments | General support. Railway improvements should be identified as key opportunities. Support improvements to bus-rail transfer. Support cycle / pedestrian network improvements. Lack of evidence. New infrastructure required in advance of development. Development should be closer to the railway station. Bus services should be maintained / improved / increased. Removing Lytton Way will negatively affect the cycle network. Community Transport should be considered. Parking costs should be higher than bus fares. Object to moving the bus station. Luton airport should be closed to reduce noise and unsustainable transport. No provision for charging electric vehicles. | |
| Policy IT6: Sustainable transport | Railway improvements will not increase capacity. Support improvements to bus and rail connections. | |
| Policy IT7: New and improved links for pedestrians and cyclists | Provide traditional footpaths, not underpasses. Support provision for pedestrians and cyclists. Welcome closure of Lytton Way. Concerns around impacts of Lytton Way closure. | |
| Policy IT8: Public parking provision | No specific comments. | |

Housing

3.26 Strategic policy / general comments

| Section / Policy | | Summary of responses |
|--|---------------------|---|
| SP7: High Quality Homes and general comments | Housing target | Target too high. Evidence is unclear / incorrect. OAN is different to the 7,600 target. Housing need should be balanced with constraints. Recent office to residential permissions not taken into account. Support target that meets or exceeds OAN. Agree with HMA and the SHMA. Welcome Gypsy and Traveller target. |
| | Alternative options | New Garden City should be considered. Brownfield options should be looked at more closely. Should consolidate and improve existing. Open spaces should be built on before Green Belt. |

| Section / Policy | Summary of responses |
|------------------|---|
| General | Should not be providing for commuters. Support for urban extensions. Support cross-boundary working. Object to new homes on open spaces. Support development early in plan period. Support brownfield allocations. HMOs should be resisted. |

3.27 Housing allocations

| Section / Policy | Summary of responses |
|---|--|
| HO1/1 (Bedwell Cresent neighbourhood centre) | No specific comments. |
| HO1/2 (Bragbury End sports ground car park) | Flood risk. Object to removal of trees. Impacts on adjacent properties. Landowner support. |
| HO1/3 (Burwell Road neighbourhood centre) | No specific comments. |
| HO1/4 (Dunn Close garage court) | No specific comments. |
| HO1/5 (Ex-play centre, Scarborough Avenue) | Object to loss of play centre and park. |
| HO1/6 (Former Pin Green School playing field) | Landowner support. In conflict with other Plan objectives to protect open spaces. |
| HO1/7 (Fry Road day nursery) | Concerns over parking and access. Green spaces should not be used for housing. |
| HO1/8 (Ken Brown car showroom) | No specific comments. |
| HO1/9 (Kenilworth Close neighbourhood centre) | No specific comments. |
| HO1/10 (Land at Eliot Road) | Lack of information to assess wastewater infrastructure. |
| HO1/11 (Land west of North Road, Rugby Club) | Site needed for hospital expansion (land allocated for hospital use is not suitable). Flood risk. Buffer required around pylons. Landowner support. Support relocation of sports facilities. Infrastructure concerns. Object to loss of sports facilities. Incorrect site boundary - should include Tennis Club. |
| HO1/12 (Marymead neighbourhood centre) | The shops are of historical significance. Plans are unclear. |
| HO1/13 (Scout Hut, Drakes Drive) | Object to loss of scout hut and adjacent land. Loss of trees. |

| Section / Policy | Summary of responses |
|--|---|
| HO1/14 (Shephall Centre and adj. amenity land) | Density is too high. Object to loss or relocation of community facility. Loss of the centre would not negatively impact conservation area. |
| HO1/15 (Shephall View) | No specific comments |
| HO1/16 (The Glebe neighbourhood centre) | No specific comments |
| HO1/17 (The Hyde neighbourhood centre) | No specific comments |
| HO1/18 (The Oval neighbourhood centre) | Concerns regarding wastewater infrastructure. Flood risk and drainage issues. Concerns around parking. Concerns around lack of infrastructure, particularly schools and GP's. |

3.28 Urban Extensions

| Section / Po | licy | Summary of responses |
|----------------------------|---------|--|
| HO2 (Stevenage West) | Support | Sustainable location. Landowner support. Preference for this site over the north. Wildlife impacts are minimal. Education provision welcomed. Support cross-boundary working. |
| | Object | Developer requirements are unrealistic / unevidenced. A larger development should be considered. Landowner objections. Health concerns relating to power lines. Infrastructure concerns. A1(M) urban barrier should be retained. Impacts on villages / surrounding area. Doubts over deliverability. Environmental impacts. Recreation provision is insufficient. Development would be isolated. Concerns relating to access points. |
| | General | Airport noise mitigation is essential. Sports provision must meet up-to-date needs. Self build plots can convert to conventional plots after 2 years. |

| Section / Po | licy | Summary of responses |
|--------------------------------|---------|---|
| HO3 (North of Stevenage) | Support | Landowner support. Support cross-boundary working. Landowner support. Agree with Historic Impact Assessment. Suitable for Green Belt release. |

| Section / Policy | Summary of responses |
|------------------|--|
| Object | Impacts on villages / surrounding area. Harm to heritage assets. Object to loss of Green Belt (Exceptional Circumstances not demonstrated). Loss of open space / recreation land. Infrastructure / flood risk concerns. Environmental impacts. Rights of Way should be retained - existing footpath will be ruined. Concerns around wider scheme in NHDC. Views will be destroyed. Concerns relating to access points. Affordable homes should not be provided in this area. Density is too high / too low. Specific developer requirements questioned. Secondary school provision required. |
| General | Consider proximity to pylons. Self build plots can convert to conventional plots after 2 years. |

| Section / Po | licy | Summary of responses |
|----------------------------------|---------|--|
| HO4 (South East Stevenage) | Support | Landowner support. Support requirements relating to sports facilities. Sustainable location. Suitable for Green Belt release. |
| | Object | Remote location. Object to loss of Green Belt (Exceptional Circumstances not demonstrated). Impacts on villages / surrounding area. Impact on River Beane. Infrastructure / flood risk concerns. Level 2 SFRA required. Environmental impacts - particularly badger setts. Density is too high / too low. Specific developer requirements questioned. A larger development should be considered. |
| | General | Consider impact on soils. Self build plots can convert to conventional plots after 2 years. |

3.29 Other housing policies

| Section / Policy | Summary of responses |
|---|--|
| Policy HO5: Windfall Sites | Site size should not dictate appropriateness. The effect of the detrimental impact and its acceptability should be the test. |
| Policy HO6: Redevelopment of existing homes | No specific comments. |

| Section / Policy | Summary of responses |
|---|---|
| Policy HO7: Affordable housing targets | Social rent / council housing should be prioritised. Starter Homes can help meet needs. Targets and requirement to 'maximise provision' are conflicting. Targets are too high. Affordable homes should not be for commuters. Support for targets. Should acknowledge viability constraints. |
| Policy HO8: Affordable housing tenure, mix and design | Precise nature of tenure mix not specified. General support. Fails to acknowledge increasing ownership and starter homes initiatives (Housing and Planning Bill). Greater flexibility required. Not evidence based. |
| HO9: House types and sizes | General support. Aspirational homes target is too low. Should acknowledge viability constraints. Design must be considered. Object to conversion of homes to flats and HMO's. |
| Policy HO10: Sheltered and supported housing | Provision should be subject to viability and market demand. More emphasis required. |
| Policy HO11: Accessible and adaptable housing | Not relevant for all schemes i.e. Starter Homes or town centre flats. Target is too high. Not evidence based. Conflicts with national guidance. |

Gypsy and Traveller provision 3.30

| Section / Policy | Summary of responses |
|--|--|
| HO12: Gypsy and Traveller provision | Infrastructure / flood risk concerns. Impact on villages / surrounding area. Uncertainty around future requirements - a smaller site should be allocated. Object to evidence base. Object to loss of Green Belt (Exceptional Circumstances not demonstrated). Not a sustainable location. Planting is not sufficient mitigation. Dyes Lane should be extended instead. Concerns around debris / crime and anti-social behaviour. Lack of consultation with local people/groups. Environmental impacts. |

32

<u>Design</u>

| Section / Policy | Summary of responses |
|---|--|
| SP8: Good Design and GD1: High Quality Design | Flexibility required. High level of architecture is important. Integrate schemes adjacent to rural areas. Inappropriate to prepare cross-boundary masterplans on land not controlled by the developer. Should require connected SuDS and green infrastructure. Requirements should be subject to viability. Wildlife friendly design rather than offsetting should be encouraged. Low carbon requirements should be included. Lack of evidence. Impacts not assessed. Negotiating every application will cause delay. Policy stifles innovation. Further measures suggested. Avoid bright colours. Include requirement to consult with Hertfordshire Constabulary. |

Healthy Communities

| Section / Policy | Summary of responses |
|---|--|
| Policy SP9: Healthy Communities and general comments | No consideration given to GP surgery demand. Closed play areas should be reopened. Provision for faith / spiritual spaces required. Provision of community facilities should be subject to viability. Support masterplanning of health centre facilities. Provision of healthcare facilities must be subject to demand. Support positive approach to leisure / sports facilities. Consider new initiatives to integrate communities. Existing leisure / recreation provision is lacking. Should cross reference other policies that impact on good health and well-being. Consider the use of a Health Impact Assessment for major development. Object to the relocation of the Arts and Leisure Centre. Forster Country should be retained for its recreational benefits. No education strategy for development in the north. No capacity at schools. |
| Policy HC1: District, local and neighbourhood centres | Landowner support. |
| Policy HC10: Redundant school sites | Support the recognition of school playing fields in meeting community needs. |
| Policy HC3: The Health Campus | Support provision for hospital expansion. Concerns around traffic / parking impacts. Should not include uses other than C2 and D1. Land is remote from the hospital and topography and pylons are an issue. Leaseholder objection. Flood risk concerns. Landowner support. |

| Section / Policy | Summary of responses |
|---|--|
| Policy HC4: Existing health, social and community facilities | A hospice is required. There is little provision for respite care. |
| Policy HC5: New health, social and community facilities | Support for new GP surgeries. |
| Policy HC6: Existing leisure and cultural facilities | Provides a robust basis for assessing proposals. Supported by an appropriate evidence base. Broadly accords with NPPF and Sport England's policies. Existing centres should be protected. |
| Policy HC7: New and refurbished leisure and cultural facilities | Criterion c. does not apply to sports facilities. Provision for all ages should be considered. Standalone theatre should be provided. Support refurbishment of the swimming pool. A new walking area should be provided. |
| Policy HC8: Sports facilities in new developments | Approach is justified by the evidence base. Not clear how funds will be secured under CIL. Requirements should be subject to viability and masterplanning. No need for this policy. |
| Policy HC9: Former Barnwell East secondary school | A robust evidence base exists. Support provision of more schools. Further provision is required. Landowner support. Request more flexibility around the sports hall provision. |

Green Belt

| Section / Policy | Summary of responses |
|---------------------------------------|--|
| SP10: Green Belt and general comments | General objections. Concern around impact on villages / surrounding area. Loss of cultural / historic assets (particularly Forster Country). Environmental impacts. Loss of open space / recreation land. Object to evidence base. Exceptional Circumstances not demonstrated (contrary to NPPF). Alternatives not fully considered e.g. a new New Town, brownfield land, open spaces. General support. Infrastructure / flood risk concerns. Lack of cooperation with NHDC. Support working with neighbouring authorities. Support evidence base. |
| Policy GB1: Green Belt | General objections to Green Belt release (as summarised under SP10). Welcome addition of land to the Green Belt. Object to inclusion of Norton Green in Green Belt. |

| Section / Policy | Summary of responses |
|------------------------------------|--|
| Policy GB2: Green Belt settlements | Contrary to national policy. General support. Wording is ambiguous. Object to allowance of infill development. Approach will be inconsistent with NHDC. Todd's Green should be released from the Green Belt. |

Climate Change, Flooding and Pollution

3.31 Strategic policy / general comments

| Section / Policy | Summary of responses |
|---|--|
| Policy SP11: Climate change, flooding and pollution | General support. Support measures to mitigate airport noise. Should recognise the role green space can play in addressing climate change. Add references to 'wildlife, biodiversity, watercourses and open water'. Policies should seek to create new habitats and enhance biodiversity. Potential flooding increase not adequately assessed. Development sites are on flood plains and water attenuation areas. |

3.32 Climate change

| Section / Policy | Summary of responses |
|----------------------------|--|
| Policy FP1: Climate Change | New development should not increase the carbon footprint. Support inclusion of water efficiency policy. Wording should be stronger. Should reference viability. Should not replicate building regs. SUDS are not always appropriate. |

3.33 Flooding

| Section / Policy | Summary of responses |
|--|---|
| Flood Risk (general comments) | Support maximisation of SuDS. River corridors and FSRs also provide essential habitat. FSRs should provide as much biodiversity value as possible. Concerns around increased flooding in villages. |
| Policy FP2: Flood risk in Flood Zone 1 | Support maximisation of SuDS. The requirement for SuDS should apply to all major development, not just sites over 1ha. Concerns around increased flood risk from specific sites. Residents should be consulted on drainage issues. Encourage joint working to resolve issues. |

| Section / Policy | Summary of responses |
|--|--|
| Policy FP3: Flood risk in Flood Zone 2 and 3 | Support maximisation of SuDS. The requirement to use SuDS should apply to all major development, not just sites over 1ha. General support. Support inclusion of deculverting and buffer zones. Should be clear what will make the FRA acceptable to grant planning permission. Potential flooding increase not adequately assessed - particiularly in nearby villages. |

3.34 Pollution

| Section / Policy | Summary of responses |
|--------------------------------------|--|
| Pollution (general comments) | Support consideration of aircraft noise. Support managed growth in Stevenage. Welcome inclusion of SPZs. Best practice guidance should be referenced. Lighting should be low level to reduce impacts. Lack of stand-alone policy for air quality. An AQMA may be designated in the future. Layout of significant development should consider air quality - HO2 in particular due to the A1(M). |
| Policy FP7: Pollution | Should include water pollution. |
| Policy FP8: Pollution sensitive uses | General support. Should refer to planning obligations, not contributions. |

The Natural and Historic Environments

3.35 Green Infrastructure

| Section / Policy | Summary of responses |
|--|---|
| Policy SP12: Green Infrastructure and the natural environment and general comments | Does not reflect the NPPF avoid, mitigate and compensate hierarchy. Priority species should be protected and habitats created. Should refer to the Chilterns AONB, SSSI sites and the Lea Valley SPA. Should include a policy on landscape. Support the protection of parks and recreation grounds that incorporate sports facilities. Green Belt release and loss of Forster Country is contrary to SP12. Object to loss of Biodiversity. Biodiversity offsetting will not work. Green space should be retained. Blue corridors and infrastructure should be included. New developments should provide built-in bat & bird bricks / boxes. Should consider the management of non native species. Support reference to 'spaces left over after planning'. |
| Policy NH1: Principal Open Spaces | General support. Welcome approach to small scale recreation and leisure developments. Support evidence base. |

| Section / Policy | Summary of responses |
|---|---|
| Policy NH2: Wildlife Sites | Should encourage linkages between Wildlife Sites. Norton Green should be included. The BIAC should be used to measure impacts on Wildlife Sites. The biodiversity report should be adhered to. Policy wording should provide clear protection. General support. |
| Policy NH3: Green Corridors | Should also include Blue Corridors. Proposals should contribute to improved and appropriate riparian management. General support. NH3 should recognise the role of Green Links to enable species to move. Transport corridors and junctions should be designed to enable movement. Road verges should be managed for nature conservation. |
| Policy NH4: Green links | Impacts on wildlife should be measured using the BIAC. |
| Policy NH5: Trees and woodland | Biodiversity value should be measured using the BIAC. |
| Policy NH6: General protection for open space | Support protection of open spaces. New policy specifically relating to conserving and enhancing biodiversity suggested. All development should be required to achieve net gains in biodiversity. The BIAC should be used to assess biodiversity. |
| Policy NH7: Open space standards | Should allow for greater flexibility. Should acknowledge commuted sums will be subject to viability. |
| Policy NH8: North Stevenage Country Park | The character of the countryside will be ruined. Park is too small. Does not compensate for the loss of Forster Country. Historic setting will not be maintained. Will provide greater public access and amenity benefits. A historic landscape character assessment should be integrated into any management plan. Mitigation measures in the Heritage Impact Assessment do not include this proposal. Should state this will provide the open space allowance for North Stevenage scheme. |

3.36 Historic Environment

| Section / Policy | Summary of responses |
|--|---|
| Policy SP13: The historic environment | North Stevenage mitigation measures will not be effective. Forster Country should be protected. General support. Welcome acknowledgement that some allocations are within or adjacent to heritage assets. |
| Policy NH9: Areas of Archaeological Significance | Should include Norton Green. General support. |

Regulation 19 consultation

| Section / Policy | Summary of responses |
|---------------------------------|---|
| Policy NH10: Conservation areas | Norton Green should be a Conservation Area. General support. Support comprehensive evidence base. |

Delivery and Monitoring

| Section / Policy | Summary of responses |
|-------------------------|---|
| Delivery and monitoring | Infrastructure requirements not clear / costed / included in the Viability Study. No strategy for attracting investment. 'Unfunded' schemes should not be included. Support for specific schemes. Support for joint working. Encourage implementation of CIL. Encourage masterplanning of strategic sites. Monitoring should aim to improve / increase. Significant reliance placed on SMART motorway. IDP requirements questioned. |

Appendix 1: Consultation material

Regulation 18

Consultation letter

Planning, Regeneration and Transport Head of Planning, Regeneration and Transport: Viv Evans

Stevenage BOROUGH COUNCIL

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Our Ref: LP Consultation
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E-mail:

Dip TP, MRTPI

planningpolicy@stevenage.gov.uk

Date:

10 June 2013

Dear Sir / Madam,

Stevenage Borough Local Plan 2011 - 2031: First Consultation

Stevenage Borough Council is currently preparing its new local plan. The plan will set a vision for our town to 2031. The first consultation on the new local plan begins on Tuesday 11 June 2013.

The consultation identifies the main issues we will need to deal with in the new local plan. It tells you the options that we are considering and what we propose to do.

We are writing to you because you have previously responded to one of our planning documents or expressed an interest in the future of the Borough.

The consultation documents can be viewed on our website, www.stevenage.gov.uk. If you cannot access the internet, the documents are also available to view at the Stevenage Borough Council Offices in Danestrete, Stevenage Central Library at Southgate and the Old Town Library at 38 High Street.

If you have any questions, please contact the Planning Policy team using the details above. The deadline for comments is **5pm on Monday 22 July 2013**.

Comments can be submitted on-line via our website. They can also be posted to the Planning Policy team using the address at the top of this letter, emailed to planningpolicy@stevenage.gov.uk or faxed to 01438 242922.

Yours sincerely

Nigel Smith Principal Planning Officer, Planning Policy







Advert in The Comet



Borough Council Facebook page



Regulation 18 (Part 2)

Article in the Midweek Mercury (print version)

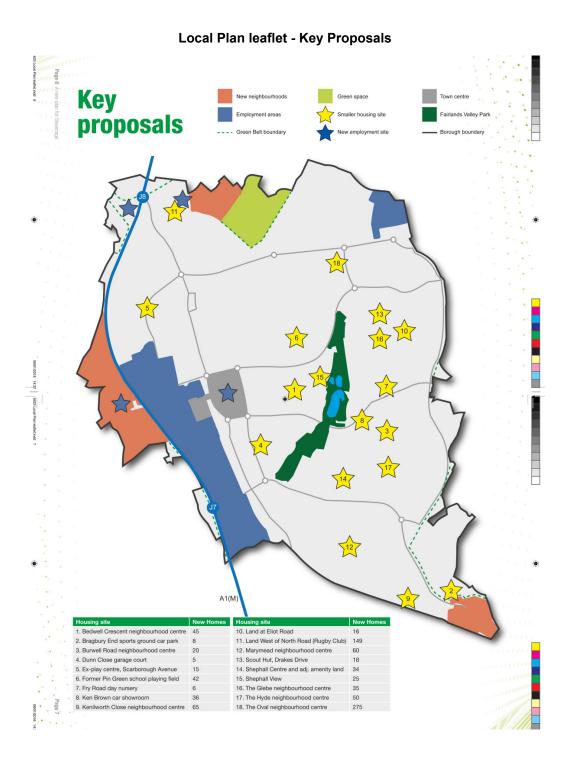


The Council's Twitter feed



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 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 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

Regulation 19





Local Plan advert



Specific consultation bodies

- The Homes and Communities Agency
- The Coal Authority,
- The Environment Agency,
- Historic England,
- The Marine Management Organisation,
- Natural England,
- Network Rail,
- Highways England,
- East And North Herts NHS Trust
- East and North Herts Clinical Commissioning Group
- Communications operators/organisations (including; Mobile Operators Association, BT Cellnet Limited, Telefónica O2 UK Limited, Telereal Trillium, T-Mobile, Virgin Media, Virgin Mobile, Vodafone Ltd.,)
- North Hertfordshire District Council
- East Hertfordshire District Council
- Other Hertfordshire authorities (including; Borough of Broxbourne, Dacorum Borough Council, Hertsmere Borough Council, St Albans City And District Council, Three Rivers District Council, Watford Borough Council, Welwyn Hatfield Borough Council)
- Hertfordshire County Council
- Hertfordshire Highways
- Parish councils (including; Aston Parish Council, Codicote Parish Council, Datchworth Parish Council, Graveley Parish Council, Knebworth Parish Council, St Ippolyts Parish Council, Walkern Parish Council, Weston Parish Council, Woolmer Green Parish Council, Wymondley Parish Council)
- Hertfordshire Constabulary
- Anglian Water
- Thames Water
- Veolia Water Central (VWC)
- National Grid

General consultation bodies and other organisations

| 5th Stevenage Air Scout Group | Ahmadiyya Muslim Association |
|-------------------------------|---------------------------------|
| Aberdeen Asset Management | Aldi Stores |
| Active4Less | Aldwyck Housing Association |
| Adlington Planning Team | Almond Hill Junior Mixed School |
| Age Concern Stevenage | Alzheimer's Society |

| Aragon Land And Planning | British Sign and Graphics Association |
|---|---------------------------------------|
| Archangel Michael And St Anthony Coptic Orthodox Church | Broadhall Community Association |
| Arlington Property Developments Ltd | Broadwater Community Association |
| Arriva The Shires And Essex Buses | Broom Barns JMI |
| Ashtree Primary School | Brown And Lee |
| Asian Women Group | Brown And Lee Chartered Surveyors |
| Association of North Thames Amenity Societies | Buddhist Centre |
| Aston Village Society | Building Research Establishment |
| Aviva Investors | Bus Users Group Stevenage |
| BAA Safeguarding Team | C.D.Bayles |
| BAe Systems | Campaign for Real Ale |
| Barclay School | Camps Hill Community Primary School |
| Barclays Bank Plc | Canyon Play Association |
| Barker Parry Town Planning | Carers in Hertfordshire |
| Barnwell School | CBRE Investors |
| Bedwell Community Association | CBRE Ltd. |
| Bedwell Primary And Nursery School | Central Bedfordshire UA |
| Bellway Homes | Centrebus |
| Bidwells | Chair North Herts Ramblers Group |
| Blooms Properties Ltd | Chambers Coaches Stevenage Ltd |
| Bloor Homes | Chells Community Association |
| Bragbury End Sports LLP | Chells Manor Community Association |
| Bridge Builders Christian Trust | Chells Scout Group |
| British Horse Society | Chelton Radomes |
| British Overseas Bank Nominees Limited | Christadelphian Community |

| Churches Together | Department For Environment Food And Rural Affairs |
|---|--|
| Churches Together in Stevenage | Department For Transport Rail Group |
| Circle Anglia | Design Council |
| Citizens Advice Bureau | Disability Information Service Herts |
| Citizens Advice Bureau | Douglas Drive Senior Citizens Association |
| Clague Ashford | DPDS Consulting Group |
| Colinade Associates Ltd | EADS Astrium |
| Colliers International | East Coast |
| Commercial Estates Group | East Herts Footpath Society |
| Commission For Racial Equality | East of England Ambulance Service |
| Connexions Stevenage | East Of England Local Government Association (formerly EERA) |
| Cortex | Eastlake Stevenage Limited |
| Costco Wholesale UK Ltd | Ecovril Ltd |
| Countryside Management Service | Epping Forest District Council |
| Countryside Properties plc, Stevenage Rugby Club and the Homes and Communities Agency (Cambridge) | Essex County Council |
| CPRE Hertfordshire | F&C REIT Asset Management |
| Crossroads Care (Hertfordshire North) | Fairlands Primary School And Nursery |
| Croudace Strategic Ltd | Fairlands Valley Sailing Centre |
| CTC Cyclists | Fairview Road Residents Association |
| CTC The National Cycling Charity | Featherstone Wood Primary School |
| Cygnet Healthcare Ltd | Fields in Trust |
| Davies And Co | Finishing Publications Ltd |
| Deloitte | First Plan |
| Department For Business, Innovation and Skills | Fitness First Plc |
| Department For Culture Media And Sport | Friends of Forster Country |

| Friends of the Earth | Hermes Real Estate Investment Ltd |
|--|--|
| Friends Religious Society | Hertford Road Community Association |
| Friends, Families and Travellers and Traveller Law Reform Project Community Base | Hertfordshire Action on Disability |
| Fusion | Hertfordshire Association for the Care and Resettlement of Offenders |
| Gabriel Securities Ltd | Hertfordshire Association Of Parish And Town Councils |
| Genesis Housing Group | Hertfordshire Association Of Young People |
| GHM Consultancy (Logic Homes) | Hertfordshire Biological Records Centre |
| Giles School | Hertfordshire Care Trust |
| Glanville | Hertfordshire Chamber Of Commerce And Industry |
| Glasgow City Council | Hertfordshire Fire And Rescue Service |
| GlaxoSmithKline | Hertfordshire Gardens Trust |
| Government Equalities Office | Hertfordshire Hearing Advisory Service |
| Graveley Against SNAP Proposals (GASP) | Hertfordshire LEP |
| Graveley Nurseries | Hertfordshire Society for the Blind |
| Graveley School | Hertfordshire Stop Smoking Service |
| Great Ashby Community Council | Hertfordshire University |
| Great Ashby Community Group | Hertfordshire Visual Arts Forum |
| Great Ashby Community Resource Centre | Herts & Middlesex Wildlife Trust |
| Greene King Plc | Herts Against the Badger Cull |
| Greenside School | Herts Gay Community |
| Gregory Gray Associates | Hightown Praetorian Association Women's Refuge |
| Gujarati Hindu Association | Hightown Praetorian Churches Housing Association |
| Hanover Housing Association | Hill Residential Limited |
| HAPAS | Hilliers HRW Solicitors LLP |
| Heaton Planning Ltd | Hitchin Town Action Group |

| HMWT | Langley Parish Meeting |
|--|--|
| Holiday Inn Express | Larwood School |
| Holy Trinity Church | Lepus Consulting |
| Home Builders Federation | Letchmore Infants And Nursery School |
| Home Group | Letchworth Garden City Heritage Foundation |
| Howard Cottage Housing Association | Leys Primary And Nursery School |
| Howard Property Group | Lincolns Tyre Service Ltd. |
| HSBC Trust Company (UK) Limited | Living Streets |
| Hubert C Leach Ltd | Lodge Farm Primary School |
| Hythe Ltd | London and Cambridge Properties Ltd |
| Iceni Projects Limited | London Borough of Barnet |
| Independent Custody Visitors Scheme | London Borough of Enfield |
| Intercounty Properties | London Borough of Harrow |
| J Young Investments Ltd. | London Gypsy and Traveller Unit |
| JB Planning Associates | London Luton Airport Operations Ltd |
| Jehovah's Witnesses | Longmeadow Primary School |
| John Henry Newman RC School | Lonsdale School |
| Jones Day | Luton Borough Council |
| Jones Lang LaSalle | Mantle |
| Kirkwells | Marine Management Organisation |
| Knebworth Estates | Marriotts Gymnastics Club |
| Knebworth House Education and Preservation Trust | Marriotts School |
| Lambert Smith Hampton | Martin Ingram Opticians |
| Land Registry Head Office | Martins Wood Primary School |
| Lanes New Homes | Mayor of London |

| MBDA UK Ltd | Office for Rail Regulation |
|---|---|
| Miller Strategic Land | Old Stevenage Community Association |
| Mind in Herts | On Behalf Of St. Peter's Church |
| MKG Motor Group | Origin Housing Group |
| Moss Bury Primary School | Outdoor Advertising Association |
| Moult Walker Chartered Surveyors | Oval Community Centre |
| MS Society Mid Hertfordshire | PACE |
| NaCSBA | Paradigm Housing Group |
| National Express | Patient Liaison Group |
| National Housing Federation | Peacock And Smith |
| National Offender Management Service | Peartree Spring Junior School |
| Natural England | Pennyroyal Ltd. |
| Network Rail | Pentangle Design |
| NFGLG | Persimmon Homes |
| NHS East and North Hertfordshire CCG | PHD Associates |
| North Hertfordshire and Stevenage Green Party | Physically Hanidcapped And Able Bodied Club |
| North Hertfordshire College | Picture Ltd |
| North Hertfordshire Friends Of The Earth | Pigeon Investment Management Ltd |
| North Hertfordshire People First | Pigeon Land Ltd |
| North Herts & Stevenage Green Party | Pin Green Community Centre |
| North Herts and Stevenage Community Learning DisabilityTeam | Pin Green Residents Group |
| North Herts Homes | Planning Issues Ltd |
| North Herts People First | Planning Potential Ltd |
| North Stevenage Consortium | Planware Ltd. |
| Odyssey Group Holdings | POhWER |

| Princes Trust | Showmen's Guild Of Great Britain |
|--|---|
| Putterills Of Hertfordshire | Simmons And Sons |
| Rapleys LLP | South East Midlands Local Enterprise Partnership |
| REACT | Sport England |
| Redrow Homes Eastern Division | Sport Stevenage |
| Regional Land Holdings Ltd. | Springfield House Community Association |
| Relate North Hertfordshire And Stevenage | St Margaret Clitherow RC Primary School |
| Renshaw UK Limited | St Nicholas Community Centre |
| Rev David Morris | St Nicholas School |
| rg+p Ltd | St Vincent De Paul RC Primary School |
| Ridgemond Park Training Centre | Stanhope Plc |
| River Beane Restoration Association | Starcourt Construction Ltd. |
| Road Haulage Association | Stevenage And North Hertfordshire Indian Cultural Society |
| Roebuck Nursery And Primary School | Stevenage and North Herts Women's Resource Centre |
| Round Diamond Primary School | Stevenage Business Initiative |
| RPF Developments | Stevenage Caribbean And African Association (SCARAFA) |
| RPS Planning and Development Ltd | Stevenage Cricket Club |
| RSPB | Stevenage CVS |
| Sainsbury's Supermarkets Ltd | Stevenage Depression Alliance |
| Savils | Stevenage Haven |
| Saving North Herts Green Belt | Stevenage Irish Network |
| Secretary of State for Communities | Stevenage League Of Hospital Friends |
| Seebohm Executors | Stevenage Leisure Park |
| Shephalbury Sports Academy | Stevenage Mosque |
| Shephall Community Association | Stevenage Muslim Community Centre |

| Stevenage Polish Association | The Salvation Army |
|--|---|
| Stevenage Quakers | The Theatres Trust |
| Stevenage Quakers | The Woodland Trust |
| Stevenage Sikh Cultural Association | Thomas Alleyne School |
| Stevenage Society For Local History | TRACKS (Autism) |
| Stevenage Town Rugby Club | Transport for London |
| Stevenage Women's Refuge | Trotts Hill Primary And Nursery School |
| Stevenage World Forum For Ethnic Minorities | Turley |
| Stevenage Youth Council | Universities Superannuation Scheme Ltd |
| Stewart Ross Associates | USF Nominees Ltd. |
| Strutt and Parker LLP | Veale Associates |
| Symonds Green Community Association | Vincent And Gorbing Planning Associates |
| Taylor Wimpey | Visit East Anglia |
| Terrace Hill Developments Ltd | Waitrose Ltd |
| The Baha'l Community of Stevenage | West Stevenage Consortium |
| The Campaign for Real Ale | Wheatley Homes |
| The Charities Property Fund | Willmott Dixon Housing |
| The Greens & Great Wymondley Residents Association | Wm Morrisons Supermarket Plc |
| The Guiness Trust | Women's Link |
| The Guinness Partnership | Woodland Trust |
| The Gypsy Council | Woolenwich Infant And Nursery School |
| The Hitchin Forum | Wyvale Garden Centres Ltd |
| The Living Room | YMCA Space Stevenage |
| The National Trust | Young Pride in Herts |
| The Nobel School | Youth Council |

³² Just under 900 individuals are also listed on our consultation database and were consulted on the Local Plan.

Appendix 3: Respondents to consultations

Regulation 18

| Aberdeen Asset Management | Mark Bryant | Graham Fraser-Andrews |
|----------------------------------|-------------------------------------|----------------------------------|
| Beryl Alabaster | Mr and Mrs K Burrell | Friends of Forster Country |
| Dr John S Alabaster | Campaign for Real Ale (CAMRA) | The Garden Centre Group |
| Tim Alexander | Alan Cantwell | John & Kathleen Gardiner |
| Mr and Mrs Allard | W Cartwright | GASP |
| Anglian Water | Central Bedfordshire UA | Loyd Gerken |
| Peter Ansell | David Clarke | GlaxoSmithKline |
| John, Daphne & Susan Apter | Mr E A Coles | Carole Gomez |
| Margaret Ashby | Mrs E A Coles | Graveley Parish Council |
| Aston Parish Council | Costco Wholesale UK | Mr John Greenaway |
| Aston Village Society | Don Courtman | Peter Greasby |
| Irene Auerbach | M Courtman | Great Ashby Community Council |
| Dr Robin Bailey | CPRE Hertfordshire | James Green |
| Mr C Barker | Croudace Strategic Limited | Mary Gregg |
| Dr Jon Bartlett | East and North Herts NHS Trust | Gautham Gurumurthi |
| Mrs M Barker | East Hertfordshire District Council | Brian Hall |
| Erik Ga Bean | Bernie Eccles | Keith Hall |
| Bellway, Miller Homes & Wheatley | Jocelyn and Brian Eldridge | Linda Hale |
| Sarah Bissett Scott | Moira Elliott | Graeme Harkness |
| Mrs D Black | Graham Ellis | Mrs H A Harrington |
| Richard Blake | Dr Adrian Emery | M J Harrington |
| Bloor Homes | English Heritage | Mr & Mrs J Hazell |
| Peter Bracey | Environment Agency | Hertfordshire County Council |
| Margaret Brett | Mr and Mrs G Evans | Herts & Middlesex Wildlife Trust |
| Mrs E Brown | Janis and Joe Feely | Hertfordshire Gardens Trust |
| Jacqui & Steve Brown | Jean Foley | Hertsmere Borough Council |
| Peter Brown | James Fraser | Philip and Brenda Hewett |

| Barbra Higgins | Susan Mefo | The Ramblers Association |
|---------------------------------------|--------------------------------------|-----------------------------|
| The Highways Agency | Tony Meredith | Jack Rigg |
| Joan Hodges | S Mihailovic | Karen and John Robinson |
| Sandra Holland | Pierre Miles | RPF Developments |
| The Homes and Communities Agency | Mono Consultants Ltd | Sainsburys Supermarkets Ltd |
| The Howard Property Group | David Morrison | Peter Scott |
| T M Hudson | Jan Mortiboy | Steve Shaw |
| Miss Nichola Hughes | Linda & Peter Munt | Sue Shearing |
| Cllr Tony Jackson | Patrick Murphy & Graziella Antonelli | Kath and Derrick Shorten |
| Mr and Mrs N S Jenkins | Hilary Napier | Dian Simm |
| Susan Jones | National Grid | Carol Skull |
| Neale King | Natural England | John & Iris Skull |
| Denis Kingslake | Mr Neave | CJA Slater |
| Knebworth House | North Hertfordshire District Council | Andrew Smith |
| Knebworth Parish Council | Diana Northey | Mr G Smith |
| Anselm Kuhn | Sally & John Nutt | Sarah Smith |
| Mr L A Lambert | Jo O'Connor | John Spiers |
| Geoffrey Laughlin & Phillipe Hartmann | Mrs K O'Hanlon | Sport England |
| Legal & General Assurance | Marion & Rick Ohlendorf | Peter Stanbury |
| Nicole & Bernard Linsell | Joan Ostojic | Peter Stansfield |
| London and Cambridge Properties | Peter Ostojic | Stevenage Properties Ltd |
| London Luton Airport Operations Ltd | PACE | Ms R Stevenson |
| Madeline Lovelock | Dr Richard Parkinson | D G Stimpson |
| Charles Macnab | Mrs J R Pitcher | Raymond Stoltzman |
| Hugh Madgin | Richard Pople | Mr David Stone |
| Maxey Grounds & Co | Joyce M Prickett | Mr David Sully |
| J A McNab | Steve Prince | Mrs E A Sypula |

| Taylor Wimpey / Persimmon |
|------------------------------------|
| Thames Water |
| The Theatres Trust |
| Paul Thompson |
| Mark Tingley |
| The Titmuss Family |
| JRA Tompkins |
| Transport for London |
| NA and Mrs RM Tranter |
| Mrs R Turner |
| Mr Kevin Twomey |
| Universities Superannuation Scheme |
| Cllr Sarah Walker |
| Walkern Parish Council |
| Dr Michael Wallis |
| Sarah Wallis |
| Nigel & Rosemary Watling |
| Valerie Webb |
| Welwyn Hatfield District Council |
| Mr P Wickham |
| Anthony Williams |
| Kay Williams |
| M Wright |
| Ron A Wright |
| Mr David Yates-Mercer |
| Mrs Verity Yates-Mercer |
| |

Regulation 18 (Part 2)

| Dr John S Alabaster | Mr Stephen Halls | Persimmon Homes |
|--|--|-------------------------|
| Mr Russell Andrews | Mr Richard Harris | Pigeon Land Ltd |
| Anglian Water | Diana Hayward | Prince |
| Ms Margaret Ashby | Herts & Middlesex Wildlife Trust | Mrs June R Pitcher |
| Aston Parish Council | Hertfordshire Gardens Trust | Mr Stephen Prince |
| Aston Village Society | Historic England | Mr Edward Pugh |
| Dr Robin Bailey | Hitchin Town Action Group | Marlene Raftery |
| Joseph Barnes | Edna Holt | Mr Jack Rigg |
| Bellway Homes Miller Homes | Homes and Communities Agency | RPF Developments |
| Ms Sarah Bisset Scott | Mr. Peter Howard | Mr Peter Scott |
| Mr Richard Blake | Miss Nicola Hughes | Selby |
| Bloor Homes | Mrs Susan Jones | Mrs Kath Shorten |
| Mr Peter Bracey | Mrs Andrea Kelly | C J A Slater |
| Virginia and Rodney Cole | Knebworth Estates | Mr G Smith |
| M Courtman | Knebworth Parish Council | John C Spiers |
| CPRE Hertfordshire | Mr Alan Lines | Ms R Stevenson |
| Croudace Homes Ltd | Mrs Madeline Lovelock | D G Stimpson |
| Mr Matt Dranse | Mr J A McNab | Mr David Stone |
| Mr & Mrs Bernard Drummond | Mr Stephen McPartland MP | mr david sully |
| East Hertfordshire District Council | Mr John Morgan | Thames Water |
| Mr Simon Farrow | Mr Andrew Morris | Frank Townsend |
| Mr & Mrs French | Natural England | Transport for London |
| Friends of the Forster Country | North Hertfordshire and Stevenage Green Party | Mrs Elaine Vaton |
| Graveley Against SNAP Proposals (GASP) | North Hertfordshire District Council | Ms. Jennifer Woodget |
| Graveley Parish Council | Mr. David Norton | M Wright |
| Greene King Plc | Mrs Marion Ohlendorf | Mr David Yates-Mercer |
| Mr Brian Hall | Mr Rick Ohlendorf | Mrs Verity Yates-Mercer |

Regulation 19

| (Cygnet Healthcare Ltd) | Cara Ward | Dr Enric Vilar |
|---------------------------------------|---|-------------------------------------|
| (East And North Herts NHS Trust) | Caroline McDonnell | Dr Helen Birkett |
| (London Luton Airport Operations Ltd) | Caroline Partridge | Dr John S Alabaster |
| A L Brown | Catherine Wallwork | DR Kevin Maitland Smith |
| A Webb | Central Bedfordshire UA | Dr Richard Parkinson |
| Aberdeen Asset Management | Chair of Governors Graveley School | Dr Robin Bailey |
| Active4Less | Chairman Friends of the Forster Country | Dr Stephen Skittrall |
| Amendeep Kaur | Charli Campbell | E Farey |
| Andrea Skidmore | Charlotte Conner | East Hertfordshire District Council |
| Angela Hepworth | Chells Scout Group | Edna Holt |
| Angela Turner | Christine Dillnutt | Eirwen Palmer |
| Anil Chohan | Christine Marshall | Elaine Gwyther |
| Ann Cooper | Churches Together | Elizabeth Crowley |
| Ann Newman | Clare Matthews | Elizabeth Robinson |
| Ann Scott | Committee Member North Herts & Stevenage Green Party | Elspeth Jackson |
| Annette Bowdery | Co-owner Knebworth Estates | Environment Agency |
| Aston Parish Council | Countryside Properties plc, Stevenage Rugby Club and the Homes and Communities Agency (Cambridge) | Epping Forest District Council |
| Aston Village Society | Courtney Turner | Erika Turner |
| B M Rumney | Croudace Homes Ltd | Eur Ing John C Spiers |
| B Shadbolt | Daljit Dale | Felix Power |
| Beej Patel | Datchworth Parish Council | Finishing Publications Ltd |
| Bellway Homes Miller Homes | David And Deirdre Ward | G C Mehmet |
| Ben Walker | Deb Cottrell | GlaxoSmithKline |
| Benedict Harrison | Debra Matherson | Glenda Clifton |
| Bragbury End Sports LLP | Diana Hayward | Graveley Parish Council |
| Bus Users Group Stevenage | Dr and Mrs Bachelor | Greene King Plc |
| C Briggs | Dr and Mrs D L Senanayake | Gwyneth Foster |

| H Cussens | Janine Salmon | Lisa Walker |
|--|---|---------------------------------|
| H Turner | Jean Archer | Lorraine Jones |
| Hannah Kimberley | Jean Farrier | Louise Caslake |
| Hannah Kitchener | Jean Hayden | M Bains |
| Hart | Jennie Hawkins | M K Issac |
| Hayley Trampenau | Jessica Simpson | M Scallan |
| Hayley Ward | Jessica Turner | M Wright |
| Hertfordshire County Council Public Health | Jill Gray | Manel Tenuwara |
| Hertfordshire LEP | Jo Pullan | Manju Thanky |
| Herts Against the Badger Cull | Jocelyn and Brian Eldridge | Margaret Daly |
| Highways England | Jorn Peters | Margaret Hawkins |
| Hill Residential Limited | Julia Brettell | Margaret Walker |
| Historic Environment Planning Adviser Historic England | Julia Mathers | Marie Courtman |
| HMWT | Julie Peddington | Marlene Raftery |
| Home Builders Federation | K Davies | Melanie Daly |
| I A Friston | K F O'Sullivan | Miss Margaret Donovan |
| Inga Turner | Kathie Martins | Miss Nathalie Watts |
| Inna John | Kentucky Fried Chicken (Great Britain) Limited | Miss Pauline Maryan |
| Investment & Regeneration Manager (Hertfordshire) Homes And Communities Agency | Kerry Duggan | Mr & Mrs Bernard Drummond |
| J Fautley | Kevin Wharton | Mr & Mrs G.W. And B.P. Steele |
| J M Roberts | Kim Pollok | Mr & Mrs George |
| J Mills | Kim Tulley | Mr & Mrs Haesler |
| J.A England | Laura Sansom | Mr & Mrs J Jones |
| J.A. Longfellow | Leo Carpenter | Mr & Mrs John Annison |
| Jacqueline Pond | Linda Rose | Mr & Mrs Melmore |
| Janet Beacom | Lisa Kasperowicz | Mr & Mrs Paul And Diane Kennedy |
| Janet Hornby | Lisa Salt | Mr A Sperber |

| Mr A Whitaker | Mr Barry Bunningham | Mr Daniel Gwilliams |
|---------------------------|----------------------|-----------------------|
| Mr Adam Connell | Mr Barry Green | Mr Daniel Wood |
| Mr Adrian Hawkins | Mr Barry Johnson | Mr Danny Tsang |
| Mr Aidan Heritage | Mr Bill Pilgrim | Mr Darren Wright |
| Mr Alan Davis | Mr Bob Carter | Mr Dave Stimpson |
| Mr Alan Ford | Mr Brad Watts | Mr David Ellis |
| Mr Alan Gates | Mr Brian Pells | Mr David Gray |
| Mr Alan Lines | Mr Brian White | Mr David Hoxby |
| Mr Alan McCarley | Mr Bruce Clavey | Mr David Inward |
| Mr Alan McDonald | Mr Bryan Clare | Mr David Jackson |
| Mr and Mrs Adams | Mr C Zanfardino | Mr David Morgan |
| Mr and Mrs Allard | Mr Carter | Mr David Norcott |
| Mr and Mrs Avery | Mr Charles De'Ath | Mr David Owen |
| Mr and Mrs C Fielder | Mr Chris Burton | Mr David Riddell |
| Mr and Mrs Chahal | Mr Chris Marley | Mr David Smith |
| Mr and Mrs Cosham | Mr Chris Nathan | Mr David Stone |
| Mr and Mrs Meldrum | mr chris phillips | mr david sully |
| Mr and Mrs Pitcher | Mr Chris Ransom | Mr David Wiggins |
| Mr and Mrs Rex | Mr Chris Tillbrook | Mr David Yates-Mercer |
| Mr and Mrs T and P Morgan | Mr Chris Turvey | Mr Denis Kingslake |
| Mr and Mrs Thorogood | Mr clive Bell | Mr Derek Harrington |
| Mr Andrew Harvey | Mr Clive Brackenbury | Mr Don Cooper |
| Mr Andrew Nelson | Mr Clive Donaghue | Mr Donald Manning |
| Mr Andrew Pickard | Mr Colin Rafferty | Mr Doug Scholes |
| Mr Anthony Glanfield | Mr Colin Rawlings | Mr DV And SM Smith |
| Mr Anthony Welsh | Mr Colin Wright | Mr E. W. Hayward |
| Mr B Jeffery | Mr D E Bartrip | Mr Eamonn Walsh |

| Mr Edward Pugh | Mr James Salmon | Mr Mark Smith |
|----------------------|----------------------|-----------------------|
| Mr Frank Everest | Mr James Simpson | Mr Martin Charles |
| Mr G Ridgley | Mr James Todd | Mr Martin Price |
| Mr G Smith | Mr Jason Turner | Mr Martin Tilley |
| Mr G.L. Thompson | Mr John Berry | Mr Mel Wood |
| Mr Gareth Wall | Mr John Campbell | Mr Mervyn Tervett |
| Mr Gary Daines | Mr John D Amess | Mr Michael Bean |
| Mr Gary Huskinson | Mr John Day | mr michael coy |
| Mr Gavin Habershon | Mr John Moir | Mr Michael M. B. Ross |
| Mr Geoff Turner | Mr John Moorhouse | Mr Mike Phillips |
| Mr Geoffrey Laughlin | Mr John Morgan | Mr Navin Kumar |
| Mr Glen Kitchener | Mr John Sim | Mr Neave |
| Mr Gordon Hadden | Mr Jonathan McCarley | Mr Neil Dunbar |
| Mr Gordon Macdonald | Mr Julian Tribe | Mr Neil Evison |
| Mr Graham Barnes | Mr K Crowe | Mr Neil Pedder |
| Mr Graham Lemon | Mr Ken Cooke | Mr Nigel Pointing |
| Mr Graham Morris | Mr Ken Wing | Mr Norman Gray |
| Mr Graham Tooze | Mr Kenneth Camp | Mr P Edwards |
| Mr Harry Turner | Mr Kenny Crowe | Mr Patrick Newman |
| Mr Henry Bracey | Mr Kevin Smith | Mr Paul Bentley |
| Mr Ian Hyde | Mr Lee Whitchelo | Mr Paul Bridden |
| Mr lan Irving | Mr Leslie Smith | Mr Paul Griffin |
| Mr Ian Lines | Mr Louis Burton | Mr Paul Schimmel |
| Mr Ivor Hancock | Mr Loyd Davies | Mr Paul Watts |
| Mr Jack Rigg | Mr M Anstiss | Mr Pete Le Porte |
| Mr James Blanksby | Mr Mark Santacreu | Mr Peter Bentley |
| Mr James Briscoe | Mr Mark Smith | Mr Peter Bracey |

| Mr Peter Fuller | Mr Robin Norledge | Mr Timothy Mefo |
|------------------------|--------------------------|------------------------|
| Mr Peter Gordon | Mr Roger Acraman | Mr tom Franklin |
| Mr Peter Kelly | Mr Roger Burt | Mr Tom McCall |
| Mr Peter Savage | Mr Roger Dunz | Mr Tom McGrath |
| Mr Peter Stones | Mr Roger Fletcher | Mr Tony Hiles |
| Mr Phil Cooper | Mr Ronald Pratt | Mr Tony Nye |
| Mr Phil Reah | Mr Ross Jackson | Mr Trevor Allin |
| Mr Philip Reeves | Mr Ru Litherland | Mr Trevor Beard |
| Mr Pritesh Vadolia | Mr Scott King | Mr Trevor Palmer |
| Mr R A Robinson | Mr Simon Martin | Mr Wayne Shambrook |
| Mr R Fautley | Mr Spencer Ryan | Mr Wayne Tamcken |
| Mr R G Wallace | Mr Stephen McPartland MP | Mr Will Sheppard |
| Mr R J Senior | Mr Stephen Osburn | Mr William Penton |
| Mr R Tribe | Mr Stephen Pollock-Hill | Mrs A B Munroe |
| Mr Rakesh Magon | Mr Stephen Prince | Mrs A Palmer |
| Mr Ralph Black | Mr Stephen Westwood | Mrs Agnieszka De Silva |
| Mr Ray Elmes | Mr Steve Durrant | Mrs Andre Harrold |
| Mr Raymond Dawson | Mr Steve Hilborne | Mrs Andrea Kelly |
| Mr Richard Aggus | Mr Steve Thomas | Mrs Ann Sharman |
| Mr Richard Blake | Mr Steven Emson | Mrs Anne Conchie |
| Mr Richard Constantine | Mr Steven Hodges | Mrs C Pickard |
| Mr Richard Everett | Mr Steven Young | Mrs Carla Sears |
| Mr Rick Ohlendorf | Mr Stewart Gillies | Mrs Caroline Gray |
| MR ROBERT HOWARD | Mr Stuart Walker | Mrs Caroline Kumar |
| Mr Robert Wright | Mr Terence Rampling | Mrs Carolyn Campbell |
| Mr Robin Baker | Mr Tim Dean | Mrs Cathleen Edwards |
| Mr Robin Dickens | Mr Tim Franklin | Mrs Cherry Carter |

| MRS Cheryl Peers | Mrs Madeline Lovelock | Ms Angela Carpenter |
|---------------------------|-------------------------|-------------------------|
| Mrs D Parry | Mrs Margaret Gibson | Ms Anne Larkins |
| Mrs Dylis Macdonald | Mrs Margaret Presland | Ms Anne-Lise Domeisen |
| Mrs Fiona Hutton | Mrs Margaret Ward | Ms Annette Fisher |
| Mrs Geraldine Hackett | Mrs Marion Ohlendorf | Ms Annette Lines |
| Mrs Gill Phoenix | Mrs Marjorie McCarley | Ms Becs Hobbs |
| Mrs Gillian Shenoy | Mrs N J Griffiths | Ms Beryl Alabaster |
| Mrs H M Jones | Mrs Nina Turvey | Ms C Kerrry |
| Mrs Hazel Barnham | Mrs Patricia Procktor | Ms Carol Beaumont |
| Mrs Hilary C Thompson | Mrs Rachel Sporton | Ms Christine Callingham |
| Mrs Jackie Hayes | Mrs Rosemary Last | Ms Christine Worsdell |
| Mrs Jennifer Watson-Usher | Mrs Ruth Baker | Ms Clare Hancock |
| Mrs Jill Richmond | Mrs S Tribe | Ms Debbie Dunn |
| Mrs Joanna Maitland-Smith | Mrs S Wolton | Ms Diane Grinham |
| Mrs Josie Norledge | Mrs Samantha Marshall | Ms Doreen Weston |
| Mrs Julie Manton | Mrs Sandie Greed | Ms Felicity Power |
| Mrs Julie Paterson | Mrs Scott | Ms Helen Lumley |
| Mrs June R Pitcher | Mrs Sue Baker | Ms Jacqueline Turner |
| Mrs Kath Shorten | Mrs Sue Jones | Ms Jane Osburn |
| Mrs Kathleen Matthew | Mrs Susan Attwood | Ms Janet Firth |
| Mrs Kathy Richardson | Mrs Valerie J Lack | Ms Janet Fraser |
| Mrs Laura Russell-young | Mrs Verity Yates-Mercer | Ms Janice Mellett |
| Mrs Laura Woodward | Mrs Vivian Snowdon | Ms Janis Archer |
| Mrs Lesley Bacon | Mrs Vivienne Hamilton | Ms Jayne Cowell |
| Mrs M Bartrip | Ms Adele Jackson | Ms Jayne Howlett |
| Mrs M Selvage | Ms Alison Blanshard | Ms Joan Galeano |
| Mrs Madelaine Crouch | Ms Amanda Wright | Ms Judy Nichols |

| | 1 | |
|-------------------------|--------------------------------------|--|
| Ms Karen Arthur | Ms Sue Casey | Patricia Milliner |
| Ms Karen Bridden | Ms Susan Tew | Patricia Samuel |
| Ms Karen Robinson | Ms Tracey Owen | Paul Rice |
| Ms Kate Barefoot | Ms Tracy Wicklow | Pavenn Kaur |
| Ms Kathie French | Ms Una Bracey | Perry Ward |
| Ms Katie Ingham | Ms Valerie Day | Picture SRL |
| Ms Kimberley Richardson | Ms Victoria King | Planning Adviser The Theatres Trust |
| Ms Lisa Bouchat | Ms Wendy Moody | Planning Director RPS Planning and Development Ltd |
| Ms Liz Brown | Ms Yvonne Millard | Planning Manager CPRE Hertfordshire |
| Ms Lucy Rayer | Ms Yvonne Shaw Basciu | Planning Manager Sport England |
| Ms Lynne Jackson | Murrell | Principal Crime Prevention design Advisor Hertfordshire Constabulary |
| Ms M Garrett | N Farey | Principal Planner Pigeon Land Ltd |
| Ms Maggie Williams | NaCSBA | Principal Strategic Planning Officer North Hertfordshire District Council |
| Ms Margaret Ashby | National Grid | Professor Emeritus David Noakes |
| Ms Margaret Maitland | Natural England | Project Develoment Manager Legal and General |
| Ms Maria Camilleri | NHS East and North Hertfordshire CCG | R F Norgan |
| Ms Mariad Cross | Nicky Gilbert | R Frosterick |
| Ms May Emson | Nicola Kendrick | R Taylor |
| Ms Michelle Kennedy | Norma Elliot | R Turner |
| Ms Nancy Bidmead | O Campbell | Rachel Dixon |
| Ms Patricia Rumpus | Origin Housing Group | Rafiq Kaskar |
| Ms Penny Lines | P Lewin | Rob and Sally Gill |
| Ms R Stevenson | P Salt | RPF Developments |
| Ms Rachel TeWinkel | P Servante | Russell Sparrow |
| Ms Rebecca Davis | P Smith | S Fairey |
| Ms Rita Boyce | Patient Liaison Group | S H Kestin |
| Ms Sheila Little | Patricia Acres | S Meredith |

| S T Smyth | Universities Superannuation Scheme Ltd | |
|---|--|--|
| S.F & A.J. Fish | V L Humphries | |
| Sainsbury's Supermarkets Ltd | Victoria Jackson | |
| Sara Holmes | Virginia and Rodney Cole | |
| Sarah-Jane Hackett | W Abbott | |
| Saving North Herts Green Belt | Wyvale Garden Centres Ltd | |
| Selby | Yvonne Pendlebury | |
| Senake Wickremasinghe | Zena Connell | |
| Senior Planning & Monitoring Officer Welwyn Hatfield Borough Co | puncil | |
| Senior Planning Officer Hertfordshire County Council (Estates) | | |
| Sheena Kitchener | | |
| Sheila Marvell | | |
| Smith | | |
| Stevenage League Of Hospital Friends | | |
| Stevenage Society For Local History | | |
| Stevenage Sports Club Limited | | |
| Suren Nair | | |
| Susan Bucktrout | | |
| Susan Farrier | | |
| T Brignall | | |
| Taylor Wimpey / Persimmon | | |
| Team Leader Local Plans Luton Borough Council | | |
| Thames Water Property | | |
| The Draper Family | | |
| The Greens & Great Wymondley Residents Association | | |
| The Titmuss Family | | |
| Transport for London | | |

Appendix 4: Main issues raised in Local Plan First Consultation (Reg 18)

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⁽³⁾.

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 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 | |

³ 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 | |
| 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 Gunnels Wood. |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? |
|---|---|
| Employment | |
| 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. |
| 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 |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? |
|---|---|
| Employment | |
| | 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. |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? |
|--|--|
| Employment | |
| 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. |
| 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 and 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 |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? |
|---|--|
| Employment | |
| | 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 Comments on / support for 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 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. |
| 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. |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? |
|--|--|
| Employment | |
| 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 | |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? | |
|---|--|--|
| Employment | | |
| 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. | |
| 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. | |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? |
|--|--|
| Employment | |
| | 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 |

| Main issues raised in written | How these issues have been addressed? | |
|---|--|--|
| comments (SBC summary of comments received) | | |
| Employment | | |
| 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. | |
| 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 out neighbours to ensure a strategic approach to education facilities is taken. Up-to-date needs will be met within the most suitable location available. | |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? |
|---|--|
| Employment | |
| 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. |

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? | |
|---|---|--|
| Employment | | |
| 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. | |
| 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 he 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 it 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 sustaina | ability | |
| 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 significant 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 | |

Appendix 4: Main issues raised in Local Plan First Consultation (Reg 18)

| Main issues raised in written comments (SBC summary of comments received) | How these issues have been addressed? |
|--|--|
| Employment | |
| | 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 plans 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. |

Appendix 5: Main Issues raised in Housing Targets Consultation (Reg 18, Part 2)

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. |
| Compatability 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 |

| Main issues raised in written comments (SBC summary of comments received) | How the main issues are addressed | | | |
|--|---|--|--|--|
| | 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 land to the east of Gresley Way. | | | |
| 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. | | | |
| 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 Landscape Sensitivity and Capacity Study. | | | |
| 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 designations. | | | |
| Impacts upon historic environment | Heritage Impact Assessments for proposed allocations in or adjacent to Conservation Areas have now been completed. | | | |

| Main issues raised in written comments (SBC summary of comments received) | How the main issues are addressed | | |
|---|---|--|--|
| '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. | | |
| 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. | | |

| Main issues raised in written comments (SBC summary of comments received) | How the main issues are addressed | |
|---|--|--|
| 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 | a has been discussed with neighbouring authorities under the | |
| 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 exceptional circumstances 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. | |



Stevenage Borough Local Plan: Regulation 22 Consultation Statement