

Appendix 1

WHBC response forms to 2016 Stevenage Local Plan Consultation

5 points of support

Local Plan Representation Form
January 2016



1. To which part of the Local Plan does this representation relate?

Chapter 5 – Strategic Policies – Policy SP7

2. Do you consider that the Local Plan has been prepared in accordance with the Duty to Cooperate?

Yes

3. Do you consider that the Local Plan has met the legal requirements?

Yes

4. Do you consider that the Local Plan has met the procedural requirements?

Yes

5. Do you consider that the Local Plan is sound?

Yes

6. If no, why do you consider that the Local Plan is unsound?

N/A

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

We welcome your proposed housing target of 7,600, which is slightly higher (4%) than the Objectively Assessed Need (OAN) of 7,300 homes for Stevenage over the plan period. It is evident that you have sought to work positively to meet your needs by effectively proposing to release all of the land within Stevenage which is suitable for housing from the green belt, as well as by proposing to build new homes at a high density on a number of sites around the town centre.

We also welcome your intention to target to provide at least your minimum need of 11 new pitches for the Gypsy and Traveller community, given your intention to review need over the plan period and provide up to the maximum envisaged need of 16 pitches if necessary.

We further welcome your support for East Herts and North Herts allocating housing sites immediately adjacent to your boundary. This will assist those authorities in meeting their own needs, lessening knock-on impacts within the Strategic Housing Market Area, whilst still contributing to the growth of an established settlement. Given that you propose to effectively release all of Stevenage's suitable green belt land for development now, your support for the 'safeguarding' of land within North Herts to meet your future growth needs beyond the end of the plan period is also supported.

However, whilst you have proposed a housing target which we consider to be acceptable, you do not set out within the plan whether you will be able to maintain a steady supply of housing land over the plan period – you will no doubt be aware of the importance that the NPPF places upon maintaining a five year supply of housing land at all times. We consider that it would be beneficial for the plan to state this.

It would also be useful for us to understand in advance of this when development in Stevenage is likely to come forward, relative to development within Welwyn Hatfield. If you anticipate that your housing supply will not be entirely 'steady' (i.e. more homes will be built in some years than others), this could place additional demand on the housing market within Welwyn Hatfield in 'low' years, given the housing market linkages between our two areas. Equally, the timing of 'high' years within Stevenage may enable greater flexibility for us in planning our own trajectory.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

N/A

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

N/A

Local Plan Representation Form
January 2016



1. To which part of the Local Plan does this representation relate?

*Chapter 5 – Strategic Policies – Policy SP4
Chapter 7 – A Vital Town Centre – Policy TC13*

2. Do you consider that the Local Plan has been prepared in accordance with the Duty to Cooperate?

Yes

3. Do you consider that the Local Plan has met the legal requirements?

Yes

4. Do you consider that the Local Plan has met the procedural requirements?

Yes

5. Do you consider that the Local Plan is sound?

Yes

6. If no, why do you consider that the Local Plan is unsound?

N/A

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

We welcome your approach within Policy SP4, in proposing an effective moratorium on any new out-of-centre retail within Stevenage. The changing nature of retail within Stevenage in recent decades with development of several large retail parks has also affected Welwyn Hatfield – whilst a number of occupiers are ‘typical’ out-of-centre stores, others such as Argos or Boots are more typically found in town centres. As out-of-town retail in Stevenage is within the catchment of Welwyn Garden City in particular, it is considered that such a restrictive approach will be of mutual benefit.

We also note your proposed range of thresholds for Retail Impact Assessments in order to support the town centre and network of smaller centres around the borough. We are considering similar approaches in order to support our designated centres, and therefore support your approach in this regard.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

N/A

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

N/A

Local Plan Representation Form
January 2016



1. To which part of the Local Plan does this representation relate?

*Chapter 5 – Strategic Policies – Policy SP4
Chapter 7 – A Vital Town Centre – Policy TC4*

2. Do you consider that the Local Plan has been prepared in accordance with the Duty to Cooperate?

Yes

3. Do you consider that the Local Plan has met the legal requirements?

Yes

4. Do you consider that the Local Plan has met the procedural requirements?

Yes

5. Do you consider that the Local Plan is sound?

Yes

6. If no, why do you consider that the Local Plan is unsound?

N/A

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

We welcome the proposed rebuilding of Stevenage Railway Station within Policies SP4 and TC4 as part of your wider proposals for Stevenage Central. Whilst your primary motivation for this appears to be to provide a better sense of arrival into the town, it will in itself result in a more attractive and modern railway station with improved facilities. Given the role of Stevenage Railway Station in serving longer-distance regional and intercity rail services, this will benefit residents of this borough for whom Stevenage is either the origin or interchange point. It may also help to support the shared ambition of our authorities to see more longer-distance services stopping at Stevenage.

8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)

N/A

Local Plan Representation Form
January 2016



1. To which part of the Local Plan does this representation relate?

Chapter 15 – Delivery and Monitoring – Table of infrastructure projects

2. Do you consider that the Local Plan has been prepared in accordance with the Duty to Cooperate?

Yes

3. Do you consider that the Local Plan has met the legal requirements?

Yes

4. Do you consider that the Local Plan has met the procedural requirements?

Yes

5. Do you consider that the Local Plan is sound?

Yes

6. If no, why do you consider that the Local Plan is unsound?

N/A

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

We welcome and support your acknowledgement that development will impact on the local road network within Stevenage, and the proposed £6m programme of highway improvement and mitigation works. Parts of the local road network in and around Stevenage (notably the B197 and B656) provide access to the northern parts of Welwyn Hatfield, and we would therefore be concerned at any detrimental impact upon them. We also welcome the recognition and proposed enhancement of the cycle corridor south from Stevenage towards and into Welwyn Hatfield – by facilitating easier and safer use of the B197 for cycling over the relatively short distance between Welwyn Hatfield and Stevenage, there is potential to reduce vehicular demand on the road network.

However, we note that there may be a degree of uncertainty around two of the most important infrastructure schemes shown as necessary within this table – improvements to Junction 7 and Junction 8 of the A1(M). Significant reliance is placed on Highways England’s Smart Motorway scheme as the means to deliver these – whilst this is committed and we note that it is expected to be delivered relatively early in the plan period, the table only states that the related improvements to J7 and J8 ‘may’ be included into the Smart Motorway scheme.

The A1(M) is of strategic importance, not only to Welwyn Hatfield but also a far wider regional area. If it were not possible to mitigate any adverse impact upon the traffic flow through these junctions, we would be concerned that the plan was not effective – if there was a funding gap, we presume that some or all of the development proposed in your plan might not be able to come forward.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

N/A

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

N/A

Local Plan Representation Form
January 2016



1. To which part of the Local Plan does this representation relate?

Chapter 5 – Strategic Policies – Policy SP3

2. Do you consider that the Local Plan has been prepared in accordance with the Duty to Cooperate?

Yes

3. Do you consider that the Local Plan has met the legal requirements?

Yes

4. Do you consider that the Local Plan has met the procedural requirements?

Yes

5. Do you consider that the Local Plan is sound?

Yes

6. If no, why do you consider that the Local Plan is unsound?

N/A

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

Whilst we raise concerns elsewhere at parts of Policy SP3 and its supporting text, we welcome and support your proposals to maximise the amount of employment land and floorspace that can come forward within Stevenage over the plan period.

You are currently one of a small number of authorities which were given a partial exemption from the government's temporary 3-year permitted development rights for the conversion of offices to residential. Whilst this will now extend to 2019, your temporary exemption for Gunnels Wood will then lapse. Evidence from Welwyn Hatfield, as well as the rest of Hertfordshire, suggests that take-up of the permitted development right within Gunnels Wood might be significant – leading to large potential losses of employment floorspace.

We note elsewhere that you expect to have a significant shortfall in employment land within Stevenage over the plan period, and will need this to be met in adjacent local authority areas. We are therefore concerned that without any controls – and without having already lost those areas of employment land where landowners are most eager to explore other land use options – your shortfall could be even more than estimated.

An Article 4 Direction for Gunnels Wood would enable you to retain control over that area, and lessen this issue. There is no reference to the possibility of making an Article 4 Direction in your plan, although we understand that you may not yet wish to commit to this given that you have three more years of protection under the current system.

Nevertheless, we consider that it would be beneficial for the plan to set out an intention in this regard and we would support the designation of an Article 4 Direction within Stevenage. This would reassure us that the plan will be effective, and positively prepared.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

N/A

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

N/A

WHBC response forms to 2016 Stevenage Local Plan Consultation

3 points of objection

Local Plan Representation Form
January 2016



1. To which part of the Local Plan does this representation relate?

Chapter 7 – A Vital Town Centre – Paragraph 7.10

2. Do you consider that the Local Plan has been prepared in accordance with the Duty to Cooperate?

Yes

3. Do you consider that the Local Plan has met the legal requirements?

Yes

4. Do you consider that the Local Plan has met the procedural requirements?

Yes

5. Do you consider that the Local Plan is sound?

No

6. If no, why do you consider that the Local Plan is unsound?

- *Not positively prepared*
- *Not justified*

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

We recognise and support in principle your ambition to significantly regenerate Stevenage Town Centre. We also do not wish to express any concern at the target provision of 4,600m² of new retail floorspace over the plan period, which is considered to be relatively modest in a strategic context.

However, paragraph 7.10 states an intention for Stevenage to 'regain its former role within northern Hertfordshire and the surrounding area'. By implication, this amounts to a desire to attain a greater status than the other retail centres within Stevenage's catchment. Hertfordshire is currently characterised by its network of centres with overlapping catchment areas, and the most recent definition of a regional hierarchy of centres (in the

East of England Plan, prior to its abolition) places Stevenage and Welwyn Garden City on the same level of that hierarchy. Given the two centres' close proximity, there is particular concern at how your ambitions for Stevenage to become dominant might impact on the viability and vitality of Welwyn Garden City Town Centre.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Specific ambitions for Stevenage to attain a different and more dominant role within the retail hierarchy should be deleted from the supporting text, as this does not form part of the strategy and is not supported by the evidence. The impacts that such dominance could have on other centres which have overlapping catchments with Stevenage (specifically Welwyn Garden City) have not been taken into account. Your evidence base does not provide any support for Stevenage becoming a larger and more dominant centre, and this ambition is therefore neither positively prepared nor justified. Your Retail and Town Centre Needs Assessment evidence will (or should) have already have taken into account population growth, and in any case trends in retailing indicate that it is unlikely that town centres will need to expand significantly as a result of population growth. A change in the hierarchy has also not been the subject of duty to cooperate meetings.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

Yes, I wish to participate at the oral examination

Local Plan Representation Form
January 2016



1. To which part of the Local Plan does this representation relate?

Chapter 7 – A Vital Town Centre – Policies TC4, TC6, TC7 and TC12

2. Do you consider that the Local Plan has been prepared in accordance with the Duty to Cooperate?

Yes

3. Do you consider that the Local Plan has met the legal requirements?

Yes

4. Do you consider that the Local Plan has met the procedural requirements?

Yes

5. Do you consider that the Local Plan is sound?

No

6. If no, why do you consider that the Local Plan is unsound?

- *Not justified*
- *Not effective*

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

Whilst the *target* amount of floorspace proposed for the town centre in Policy SP4 is relatively appropriate, we are concerned that other policies in your plan do not support this strategy. Given your stated ambition for the town centre (see our comments on paragraph 7.10) to attain a greater role within the retail hierarchy and your regeneration proposals for the Stevenage Central area, we are concerned that necessary measures to deal with any proposals for a larger increase in retail floorspace are not in place.

Policy TC5 of the plan indicates your intention for all of the 4,600m² of new comparison retail floorspace needed within Stevenage over the plan period to be provided in a single

location, through an extension to the Westgate Centre. This area is closely related to the existing Town Centre Shopping Area, and we have no concerns with such a proposal.

However, the current wording for Policies TC4, TC6 and TC7 could make provision for additional retail floorspace over and above this need. These three policies cover very large areas of Stevenage Central away from the designated Town Centre Shopping Area and the proposed Westgate Centre extension, and appear to be capable of accommodating vast amounts of new comparison retail floorspace. The wording of these three policies state without limitation that 'planning permission will be granted for new Use Class A1, A3 and A4 shop, bar, restaurant and cafe uses' – this is excessively flexible. It is clearly not justified by your evidence or effective in terms of delivering your strategy, and is therefore unsound.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The wording in Policies TC4, TC6 and TC7 which would permit unlimited A1 retail development should be amended to ensure that a substantive increase in comparison floorspace over and above 4,600m² for the entire town centre would not be acceptable. This would allow us to conclude that these policies are justified and effective.

In addition, Policy TC12 should be amended to require any schemes which create an excessive amount of floorspace above that which would meet the needs of Stevenage to be refused. Given our concerns about the statement in paragraph 7.10 of the plan for Stevenage to attain a different role within the sub-regional retail hierarchy, such a change would provide further reassurance that you are meeting the duty to cooperate by not seeking to allow Stevenage to grow excessively without engaging with us on the matter.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

Yes, I wish to participate at the oral examination

Local Plan Representation Form
January 2016



1. To which part of the Local Plan does this representation relate?

Chapter 5 – Strategic Policies – Policy SP3 and paragraphs 5.13-5.29

2. Do you consider that the Local Plan has been prepared in accordance with the Duty to Cooperate?

Yes

3. Do you consider that the Local Plan has met the legal requirements?

Yes

4. Do you consider that the Local Plan has met the procedural requirements?

Yes

5. Do you consider that the Local Plan is sound?

No

6. If no, why do you consider that the Local Plan is unsound?

- *Not positively prepared*
- *Not effective*

7. Please give details of why you consider the Local Plan has not been prepared in accordance with the Duty to Cooperate, has not met legal requirements, has not met the procedural requirements, or is unsound. Please be as precise as possible. If you wish to support the Local Plan, please also use this box to set out your comments.

We are pleased to see that the plan acknowledges the strong economic linkages between Stevenage and Welwyn Hatfield. We are the largest workplace destination for your residents, and we therefore recognise the value that we each have in supporting the economic prosperity of the other's area. You will be aware that Welwyn Hatfield's evidence has identified that we lie within the same FEMA.

We recognise that there is no one methodology for establishing a FEMA and that it is not necessarily unacceptable for our evidence to place you within our FEMA but not the other way around. It appears that your FEMA methodology underplays the role of out-

Commuting, and given your endorsement of the LEP's Strategic Economic Plan which places us together in the A1 Growth Corridor we clearly have a very strong relationship.

This is recognised in your reference in Policy SP3 of the plan to supporting 'the retention of key employment areas within Welwyn Garden City', which you make alongside similar statements for North Herts and Central Bedfordshire (which you place within your FEMA).

Policy SP3 sets out a target to provide 140,000m² of new employment floorspace within Stevenage – it is evident that you have not only allocated all available sites, but also maximised density in order to achieve such a high figure and we welcome your efforts in this regard. We therefore note the unavoidable conclusion in your Employment Technical Paper that you are left with around 10 hectares of employment land need that you cannot meet within Stevenage. However, whilst paragraph 5.23 of the plan indicates that you will not be able to meet your need, we find that the plan itself is silent on the scale of the shortfall and therefore deficient in terms of how it will plan positively and effectively to meet it. There are evidently opportunities to provide new floorspace within North Herts and Central Bedfordshire which you support, but little clarity is given as to whether these sites are actually likely to appear in those authorities' plans and whether they are in any case needed to meet their own economic needs. Whilst Central Bedfordshire is outside of our FEMA, Stevenage and North Herts are within it and any underprovision in either area may have adverse economic impacts for all authorities.

Of further significance for Welwyn Hatfield is the implication set out in Policy SP3 for us to assist you (even if not by explicitly contributing through provision on specific sites) in meeting your shortfall. Whilst we welcome your support for the retention of employment floorspace within Welwyn Garden City – consistent with our own proposals to date – our latest evidence shows that we may no longer have a surplus of employment floorspace by the end of our plan period. This position could also be worsened if more office-to-residential prior approval schemes come forward. We have a limited number of promoted new employment sites available to us, all of which lie in the Green Belt. Our draft plan will be published this summer and it would be prudent to review the position then.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this change will make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Policy SP3 and its supporting text should be much clearer on the extent of the shortfall between employment land need and the actual employment land supply within Stevenage, in order to provide reassurance that this part of the plan has been positively prepared. Provision should be made in the policy for a review given the uncertainty that exists over where this shortfall will be made up and the difficulties in making provision for long term needs for employment land in the current planning system.

- 9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? (please select one answer)**

Yes, I wish to participate at the oral examination