



LOCAL DEVELOPMENT FRAMEWORK

Core Strategy  
Statement of Consultation (Reg. 27)

Submission to the Secretary of State - May 2010



**Stevenage**  
BOROUGH COUNCIL



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## 1 Introduction

### What is a Statement of Consultation?

**1.1** A Statement of Consultation says how we have prepared our planning documents. It should show that we have met the legal requirements set out by the Government when preparing our plans<sup>(1)</sup>.

**1.2** It says who we consulted and when this happened. The Statement of Consultation summarises the responses that were sent to us.

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

**1.4** This Statement accompanies the Core Strategy and summarises the results of the Regulation 27 consultation.

### What is the Core Strategy?

**1.5** The Core Strategy forms part of the Local Development Framework (LDF) for Stevenage. The LDF is a set of planning documents that we will use to help us decide whether to grant planning permission for new development.

**1.6** The Core Strategy tells you our overall vision for the future of Stevenage. It says how we want the town to develop and change and includes the policies that will help us to achieve this. The Core Strategy also contains a set of more detailed requirements. These are called Generic Development Management Policies. They give more information about how new buildings should be designed and what we will require new developments to provide.

**1.7** Please read the Core Strategy if you would like to find out more about it and the LDF.

### How do we decide who to consult?

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

**1.9** We adopted our SCI in December 2006. It is available on our website ([www.stevenage.gov.uk](http://www.stevenage.gov.uk)). The SCI says that we will use some or all of the following methods in consultations.

- You can see our plans at our offices, in local libraries and on our website.
- We will write to people who have told us they are interested in our planning documents. (We will do this each time there is a consultation).
- We will write press releases and put adverts in the local newspaper.
- We will send out leaflets and brochures.
- We will set up exhibitions or displays and hold meetings.
- We will give presentations and host workshops.

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1 The Town and County Planning (Local Development) (England) Regulations 2004 (as amended).

**1.10** We have a database which holds details of people, businesses and organisations that have told us they are interested in our planning documents.

## 2 Regulation 27 Consultation

**2.1** Regulation 27, also known as pre-submission, is the final stage of public consultation. Earlier in 2010, we published the Core Strategy in what we thought should be the final version. This included our vision for the future of Stevenage as well as our detailed policy requirements.

**2.2** Government regulations required us to consult on this plan for a period of at least six weeks<sup>(2)</sup>. During this time, any person could provide their comments. The regulations say we must prepare a statement which summarises the main issues raised during the consultation.

### When was this consultation?

**2.3** The consultation was approved by the Council's Executive on 16th December 2009.

**2.4** The consultation started on 28th January 2010. It ended on 11th March 2010. A copy of the consultation plan is available on our website, [www.stevenage.gov.uk](http://www.stevenage.gov.uk).

**2.5** The consultation included 17 Core Strategy policies and 31 Development Management policies along with details of our overall vision and strategy for the future of the town.

### What did we do?

**2.6** The pre-submission consultation was publicised by a range of measures including:

- Providing the specific consultation bodies with a copy of the proposed submission documents and inviting them to comment;
- Contacting more than 1,400 general consultation bodies and inviting them to comment;
- 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.
- A public notice in The Comet on January 28th 2010;
- A series of prominent adverts in The Comet on January 28th, February 4th, February 11th and February 25th 2010;
- An article in the January 2010 edition of Chronicle which is circulated to all residential properties in the Borough;
- Providing extensive information in the January 2010 edition of the Economic & Business Bulletin which is circulated to 2,700 businesses in and around Stevenage; and
- Providing posters to community centres and the Stevenage Borough Council Customer Service Centre. We also gave copies to some local shopkeepers to display in their windows.

### 2.7 Who was consulted?

**2.8** We consulted the following specific consultation bodies:

- East of England Regional Assembly (EERA)
- The Coal Authority
- The Environment Agency

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2 Town and Country Planning (Local Development) (England) Regulations 2004 (as amended)

- Natural England
- English Heritage (Historic Buildings and Monuments Commission for England)
- The Secretary of State for Transport
- Hertfordshire County Council
- East Hertfordshire District Council
- North Hertfordshire District Council
- Graveley Parish Council, Knebworth Parish Council, Langley Parish Meeting, St Ippolyts Parish Council and Wymondley Parish Council (in North Hertfordshire District)
- Aston Parish Council, Datchworth Parish Council and Walkern Parish Council (in East Hertfordshire District)
- East and North Hertfordshire Primary Care Trust
- Hertfordshire Police Authority
- East of England Development Agency (EEDA)
- Mobile Operators Association, British Telecommunications Plc, Hutchinson 3G, O2, Ofcom, Orange, T-Mobile, Virgin Mobile, Vodafone Ltd
- Eastern Electricity, National Grid Transco, Ofgem, Powergen Retail Ltd, EDF Energy
- British Gas
- Anglian Water Services Ltd, Thames Water Services Ltd, Three Valleys Water

**2.9** We also asked more than 1,400 people, businesses and organisations to tell us what they thought. This list was created from the details on our LDF database.

### **Who responded to the consultation?**

**2.10** A total of 55 responses were received to the consultation.

**2.11** This includes a response from the East of England Regional Assembly (EERA). EERA confirm that Stevenage's Core Strategy is in general conformity with the East of England Plan.

### **What have you done with these responses?**

**2.12** 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.

**2.13** Each representation has been assigned to the most relevant policy or section of the document. A total of **363 representations** have been identified.

**2.14** We have also recorded what (if anything) each representation has said about legal requirements and the tests of soundness. These are the main requirements that the Inspector will test our Core Strategy against when it is examined.

**2.15** Our plans must meet the legal requirements set out below.

- It must follow the steps that we set for ourselves in our Statement of Community Involvement (SCI). We must have prepared the plan as we said we would in our Local Development Scheme (LDS). We have to meet the regulations set by the Government.
- We must complete any environmental assessments that are required by the law.
- It must take account of what is said in national planning policy and our community strategy. It should reflect the requirements of the East of England Plan.

**2.16** The Inspector will say that our plan is 'sound' if it is "justified, effective and consistent with national policy"<sup>(3)</sup>.

- "Justified" means that the evidence shows that our plan is the best solution. The evidence might include studies or what you told us during consultations.
- "Effective" means that we can show that the policies in our plan will actually happen. We must show how we will measure if the plan is being successful and what we will do if things change. An example of a change might be an increase in our housing target.
- The Inspector will say our plan is 'sound' unless evidence at the Examination shows that this is not the case.

**2.17** **6 representations** say that our plan has not met the legal requirements.

**2.18** **44 representations** say that our plan is not justified.

**2.19** **75 representations** say that our plan is not effective.

**2.20** **33 representations** say that our plan is not consistent with national policy.

### **What were the main issues that people commented on?**

**2.21** The tables on the following pages summarise the key issues raised on the Core Strategy and Development Management Policies documents.

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3 These are the tests in Planning Policy Statement 12: Local Spatial Planning. This is the Government's guidance on writing planning documents.



## Core Strategy

- 2.22** The following table summarises the main issues raised for the Core Strategy. The summary is presented in plan order.
- 2.23** Representations are presented by policy, objective or, in the case of the Spatial Strategy, chapter. Where we refer to policies or objectives, this includes all representations on that policy / objective and its supporting text.
- 2.24** It is important to point out that the numbers presented may not always add up. Representations can object to the legal compliance and the soundness of a policy or objective. Representations can say that the plan is not sound for more than one reason.
- 2.25** Representations which supported the legal compliance and / or soundness of a policy or objective are included in the total number of representations but are not listed separately.

### Abbreviations used in summary tables

BSF	Building Schools for the Future	CIL	Community Infrastructure Levy
DfT	Department for Transport	DM	Development Management
EHDC	East Hertfordshire District Council	EoEP	East of England Plan
LDV	Local Delivery Vehicle	NHDC	North Hertfordshire District Council
PPS3	Planning Policy Statement 3: Housing	PPS4	Planning Policy Statement 4: Planning for Sustainable Economic Growth
PPS25	Planning Policy Statement 25: Development and flood risk	SBC	Stevenage Borough Council
SHLAA	Strategic Housing Land Availability Assessment	SNAP	Stevenage and North Herts Action Plan

Summary of main issues raised against the Core Strategy

Policy / Objective / Section	Total representations	Of which said...				Did not mention tests of soundness or legal compliance	Major issues raised
		Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
Spatial Vision	8	1	0	2	1	3	Conformity with EoEP ~ inclusion of strategic requirements for Stevenage; Role of town centre scheme; Biodiversity.
<b>SO01</b> Sustainable Development	3	0	0	0	0	3	None.
<b>SO02</b> Well-being from regeneration and growth	2	0	0	0	0	2	None.
<b>SO03</b> Monitoring and implementation	None	-	-	-	-	-	-
Spatial Strategy	16	0	3	5	0	3	Role of EHDC in the green belt review; Over-reliance on town centre scheme; Northern relief road; Delivery.
Key Diagram	6	0	0	4	0	2	Accuracy and quality; Area of search for Gypsy & Traveller provision.
<b>SO04</b> Housing	2	0	0	0	0	2	None.
<b>SO05</b> Infrastructure	2	0	0	2	0	0	Lack of a robust and / or detailed delivery plan.

Policy / Objective / Section	Total representations	Of which said...				Did not mention tests of soundness or legal compliance	Major issues raised
		Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
<b>CS01</b> Sustainable Development	8	1	0	0	1	5	Lack of reference to climate change, biodiversity and water efficiency.
<b>CS02</b> Housing development strategy	12	0	2	1	3	5	Housing rates after 2021; Consistency of policy with evidence (SHLAA); Conformity with PPS3 ~ sequential test.
<b>CS03</b> Green Belt	9	0	1	0	0	7	Conformity with EoEP ~ inclusion of east and south-east of Stevenage in review; Relationship between review and housing targets; Exclusion of land north of the A602 at Bragbury End from the review; Reinstatement of Norton Green into the Green Belt.
<b>CS04</b> Area Action Plans and the Site Specific Policies DPD	9	0	0	1	1	4	Relationship of SNAP to SBC and NHDC Core Strategies.

Policy / Objective / Section	Total representations	Of which said...				Did not mention tests of soundness or legal compliance	Major issues raised
		Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
<b>CS05</b> Key Infrastructure	26	0	3	11	0	12	Lack of a robust and / or detailed delivery plan; Scale and delivery of A1(M) improvements; Impact on wider road network; Water supply; Primary school provision; Timing of waste water improvements.
<b>CS06</b> Developer requirements	17	1	1	5	1	8	Relationship to national guidance / CIL; List of items in criterion a. i.; Viability.
<b>SO06</b> Employment	3	0	0	0	0	3	None.
<b>SO07</b> Retail	3	0	0	0	0	3	Relationship to existing retail provision. Reliability of evidence base for job numbers;
<b>CS07</b> Jobs, education and skills	6	0	0	2	0	4	Delivering the policy requirements; Primary school provision.

Policy / Objective / Section	Total representations	Of which said...				Did not mention tests of soundness or legal compliance	Major issues raised
		Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
<b>CS08</b> Employment land	10	0	2	0	1	6	Level of detail in relation to SNAP; Conformity with PPS4.
<b>CS09</b> Retail hierarchy	14	2	9	1	3	4	Quantum of floorspace; Reliability of evidence base; Conformity with EoEP ~ role in retail hierarchy; Conformity with PPS4; Level of detail in relation to SNAP; Formulation of policy relating to retail hierarchy.
<b>SO08</b> Social facilities	1	0	0	0	0	0	None.
<b>SO09</b> Housing for all	1	0	0	0	0	1	None.
<b>CS10</b> Health, social and community facilities	8	0	1	1	0	6	Lister hospital expansion; Location of polyclinics.
<b>CS11</b> Leisure and cultural facilities	6	0	0	2	0	3	Relationship to <i>BSF</i> . Viability;
<b>CS12</b> Housing Mix	14	0	2	5	2	5	Conformity with EoEP ~ targets vs minimums; Aspirational home provision.

Policy / Objective / Section	Total representations	Of which said...				Did not mention tests of soundness or legal compliance	Major issues raised
		Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
<b>CS13</b> Gypsies and Travellers and Travelling Showpeople	3	0	1	1	0	1	Evidence base; Provision after 2021; Developer contributions.
<b>SO10</b> Green Infrastructure	3	0	0	0	0	3	None.
<b>SO11</b> Sustainable transport	1	0	0	0	0	1	None.
<b>CS14</b> Green Infrastructure	12	0	0	2	0	6	Forster Country, Natural environment and biodiversity; Open space standards;
<b>CS15</b> Pollution and flood risk	5	0	0	1	1	3	Sewerage infrastructure; Aircraft noise
<b>CS16</b> Sustainable transport and car parking	7	0	0	0	1	6	Links to Gunnels Wood; Location of bus termini; Provision for cyclists.
<b>SO12</b> Built environment	1	0	0	0	0	1	None.

Policy / Objective / Section	Total representations	Of which said...				Did not mention tests of soundness or legal compliance	Major issues raised
		Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
CS17 Quality in design and construction	9	0	0	1	1	6	Water efficiency; Archaeology; Masterplans; Relationship to national standards.

## Development Management Policies

- 2.26** The following table summarises the main issues raised against the Generic Development Management Policies. The summary is presented in plan order.
- 2.27** Representations are presented by policy, objective or, in the case of the Spatial Strategy, chapter. Where we refer to policies or objectives, this includes all representations on that policy / objective and its supporting text.
- 2.28** It is important to point out that the numbers presented may not always add up. Representations can object to the legal compliance and the soundness of a policy or objective. Representations can say that the plan is not sound for more than one reason.
- 2.29** Representations which supported the legal compliance and / or soundness of a policy or objective are included in the total number of representations but are not listed separately.

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## Summary of main issues raised against Generic Development Management Policies

Policy / Objective / Section	Of which said...					Did not mention tests of soundness or legal compliance	Major issues raised
	Total representations	Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
<b>DM01</b> Sustainability and quality of life	6	1	3	1	1	1	Need for policy; Relationship to Design & Access statements and other 'proper' planning requirements.
<b>DM02</b> Windfall sites	7	0	1	1	0	3	Determination of major windfalls; Windfalls outside of the urban area; Relationship to identified strategic sites.
<b>DM03</b> Conversions	1	0	0	0	0	1	None.
<b>DM04</b> Redevelopment of existing homes	None	-	-	-	-	-	-
<b>DM05</b> Employment development on unallocated sites	4	0	0	1	1	2	Conformity with PPS4; Amenity requirements.
<b>DM06</b> Retail development on unallocated sites	3	0	1	0	2	1	Conformity with PPS4.
<b>DM07</b> Loss of retail floorspace	1	0	0	0	0	1	Conformity with PPS4.
<b>DM08</b> Existing health, social and community facilities	None	-	-	-	-	-	-
<b>DM09</b> New health, social and community facilities	None	-	-	-	-	-	-
<b>DM10</b> Redundant school sites	3	0	0	0	0	3	None.

Policy / Objective / Section	Of which said...					Did not mention tests of soundness or legal compliance	Major issues raised
	Total representations	Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
<b>DM11</b> Existing leisure and cultural facilities	3	0	0	2	0	1	Application to commercial premises; Assessment of viability.
<b>DM12</b> New and refurbished leisure and cultural facilities	3	0	0	0	0	3	None.
<b>DM13</b> Affordable housing thresholds	8	0	3	2	3	3	Conformity with EoEP ~ targets vs minimums; Robustness of evidence of viability; Exception criteria; Need for policy.
<b>DM14</b> Affordable housing tenure, mix and design	7	0	2	1	3	3	Conformity with EoEP ~ targets vs minimums; Assessment of applications; Robustness of evidence of viability.
<b>DM15</b> Accessible housing	2	0	1	1	1	0	Wheelchair accessible homes
<b>DM16</b> Supported housing	4	0	2	1	0	2	Threshold for provision; Relationship to affordable housing provision.
<b>DM17</b> House types and sizes	6	0	2	4	0	1	Viability; Prescriptive nature of requirements; Aspirational homes.

Policy / Objective / Section	Total representations	Of which said...					Did not mention tests of soundness or legal compliance	Major issues raised
		Not legally complaint	Not justified	Not effective	Inconsistent with national policy			
<b>DM18</b> Gypsies and Travellers and Travelling Showpeople	3	0	0	1	0	2	Need for policy; Flood risk.	
<b>DM19</b> Development of existing open spaces and play areas	3	0	0	2	1	1	Location of replacement facilities; Exception test ~ criterion c; Relationship to <i>BSF</i> .	
<b>DM20</b> New open spaces and play areas	3	0	0	1	0	2	Open space standards.	
<b>DM21</b> Requirements for new open spaces and play areas	2	0	0	0	0	2	Repetition of core policies.	
<b>DM22</b> Trees and woodland	2	0	0	0	0	2	Assessment of different types of woodland	
<b>DM23</b> Noise and light generating uses	None	-	-	-	-	-	-	
<b>DM24</b> Noise sensitive uses	2	0	0	0	0	2	Strength of policy.	
<b>DM25</b> Hazardous installations	1	0	0	0	0	1	None.	
<b>DM26</b> Flood risk	4	0	0	1	2	2	Sewer flooding; Relationship to PPS25	
<b>DM27</b> Sustainable Urban Drainage Systems	5	0	0	0	0	5	None.	
<b>DM28</b> Transport Assessments and Travel Plans	3	0	0	0	1	2	Conformity with DfT guidance.	

Policy / Objective / Section	Of which said...					Did not mention tests of soundness or legal compliance	Major issues raised
	Total representations	Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
<b>DM29</b> Parking and access	3	0	0	1	1	1	Age of current parking standards; Conformity with RSS ~ employment provision.
<b>DM30</b> High quality design	4	0	0	1	0	3	Consideration of operational requirements; Climate change and sustainability
<b>DM31</b> Energy efficiency and renewable energy	6	0	3	3	1	2	Conformity with national guidance;
							Lack of evidence base;
							Renewable energy target level;
							Flexibility of policy;
							Viability;
							Water consumption targets.

## Other sections and comments

**2.30** The following table summarises the main issues raised against other sections of the Core Strategy and in general comments for which it was not possible to identify a relevant policy, objective or section of the document.

**2.31** It is important to point out that the numbers presented may not always add up. Representations can object to the legal compliance and the soundness of a policy or objective. Representations can say that the plan is not sound for more than one reason.

**2.32** Representations which supported the legal compliance and / or soundness of a policy or objective are included in the total number of representations but are not listed separately.

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Summary of main issues raised against the Core Strategy

Policy / Objective / Section	Total representations	Of which said...				Did not mention tests of soundness or legal compliance	Major issues raised
		Not legally complaint	Not justified	Not effective	Inconsistent with national policy		
Introduction (Ch. 1)	None	-	-	-	-	-	
A picture of Stevenage (Ch. 2)	2	0	0	0	2	None.	
Delivery (Ch. 15)	9	0	0	4	4	Partnership working / LDV; Level of detail; Relationship of infrastructure to individual developments; Monitoring of indicators	
General comments ~ no specific policy, objective or section of the document identified	26	0	0	0	26	Number of DM policies; Length of document; Lack of parallel SNAP document; Need for further information on tourism, soil and waste; Overall scale of development.	



