

**Stevenage Borough Council**

**Local Plan - Partial Review and Update  
Regulation 18 Consultation**

**Consultation Statement**

**5 July – 15 August 2024**

**Stevenage**  
BOROUGH COUNCIL

## Executive Summary

The Stevenage Borough Local Plan was adopted on 22 May 2019. The Plan sets out a spatial vision for the town to 2031 and contains detailed land use policies for the Borough.

The preparation of Local Plans is subject to an extensive legal framework, as set out in relevant acts and regulations and interpreted through case law. This is supplemented by national planning policies and guidance which set out the clear principles and expectations of the planning system.

It was agreed, following legal advice, that there should be a two-stage process to reviewing the Stevenage Borough Local Plan, given the position the local authority finds itself regarding the age of the current Local Plan being 5 years since adoption.

The stages are:

- Stage 1: Local Plan – Partial Review and Update
- Stage 2: Local Plan – Full Review

The Local Plan – Partial Review and Update was prepared for a first-round public consultation (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012), which was held from 5 July to 15 August 2024.

A Partial Review's scope is to review policies and supporting text and limit only necessary changes, relating to key drivers of change since the Plan was adopted in 2019. Other wider changes will be considered for the next stage of the Local Plan Review, a Full Review of the Plan, from 2025 onwards.

During the consultation period held from 5 July to 15 August 2024, we received upwards of 300 individual representations on the report. These representations came from a variety of mechanisms that we employed for consultation, social media (Facebook, Twitter and Instagram) and a formal consultation website to record respondents' comments.

The representations came from a combination of members of the public, statutory consultees and other interested parties.

The consultation statement shows the range of responses and how the Council will respond to them. Following Regulation 18 consultation from July to August 2024, we are approaching the second stage of development of the Local Plan – Partial Review and Update. This forms the "consultation on final draft policies" stage under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and this is explored within the Council's next steps.

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## 1. Introduction

1.1 This document sets out how Stevenage Borough Council has undertaken a Regulation 18 consultation for the Local Plan – Partial Review and Update. The statement provides an overview on the following:

- Who was invited to make representations;
- How they were invited to do so;
- Summaries of the main issues raised in the representations; and
- Next steps for the Local Plan

## 2. Town and Country Planning Regulations

2.1 This consultation statement complies with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The most relevant regulations relating to the process are as follows:

- Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated.
- Regulation 12(b) requires the Council to publish the documents for a minimum 4 week consultation, specify the date when responses should be received and identify the address to which responses should be sent.
- Regulation 35: Regulation 12 states that when seeking representations, documents must be available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps;
  - Make the document available at the principal office and other places within the area that the Council considers appropriate;
  - Publish the document on the Council's website

2.2 The Local Development Scheme (LDS) of Stevenage Borough has included the intention to prepare a Local Plan Review.

2.3 The Stevenage Borough Local Plan was adopted on 22 May 2019. The Plan sets out a spatial vision for the town to 2031 and contains detailed land use policies for the Borough. The Plan superseded the District Plan Second Review (adopted 2004) as the statutory Local Plan for the Borough and is used to determine applications for planning permission.

2.4 The preparation of Local Plans is subject to an extensive legal framework, as set out in relevant acts and regulations and interpreted through case law. This is supplemented by national planning policies and guidance which set out the clear principles and expectations of the planning system.

2.5 The Plan was adopted following a lengthy Holding Direction process, following Examination in Public of the Plan by the Secretary of State which concluded in October 2017.

2.6 The Secretary of State for Ministry of Housing, Communities and Local Government (MHCLG, changed to the Department for Levelling Up, Housing and Communities or DLUHC and now since changed back to MHCLG) issued a temporary Holding Direction to prevent the Council from adopting the Plan, so that he could consider representations from the local MP largely relating to town centre regeneration and green belt issues.

2.7 The Holding Direction was lifted on 25 March 2019 by the Secretary of State, providing a resolution to the issue. The letter from the Secretary of State withdrew the direction on the understanding that the Council commit to the following actions:

- Update the Local Development Scheme (to be adopted before or at the same time as the Local Plan is adopted) to include the preparation of an Area Action Plan (AAP) for the Stevenage 'Station Gateway' area (Site TC4 in the Local Plan). The AAP should be timetabled for adoption in December 2020 or sooner.
- Provide monthly updates to MHCLG on preparation of the Area Action Plan;
- Publish for public consultation a Master Plan for the regeneration of the Stevenage Town Centre sites identified in the Local Plan as TC5 and TC2.
- Designate a lead Councillor and lead official to be responsible for progressing the preparation and implementation of the Area Action Plan, and for the implementation of the Local Plan itself.
- Remove references in the Local Plan to a new train station before adoption.

2.7 An Officer Report to Cabinet in June 2024 detailed the progression from a series of options to undertake a Local Plan Review, from "do nothing" up to a full review of the Local Plan.

2.8 Normal practice for the review of a Local Plan is to commence a partial review and update of a Local Plan, 5 years post adoption.

2.9 It was agreed, following legal advice, that there should be a two-stage process to reviewing the Stevenage Borough Local Plan, given the position the local authority finds itself regarding the age of the current Local Plan being 5 years since adoption:

**Stage 1: Local Plan – Partial Review and Update**

**Stage 2: Local Plan – Full Review**

2.10 Officers have progressed with undertaking a partial review and update of the Local Plan, which has incorporated the evidence gathered from the two rounds of consultation on the AAP. This has allowed the evidence base already gathered through the two rounds of consultation on the AAP (in 2021 and 2023), to form an updated and much clearer policy direction for Policy TC4 of the Local Plan as well as potential other policies of the plan, in accordance with wider strategic updates and objectives. This includes the continued requirement to tackle the Climate Change agenda and promoting sustainable and active travel across the Borough.

2.11 Preparation of the an updated Local Plan commenced in early 2024 and the Regulation 18 responses will allow Officers to amend the Local Plan in preparation for the next stage, a pre submission draft called a Regulation 19 consultation.

### 3 Pre Public Consultation

3.1 Prior to the Local Plan being circulated for public consultation, the report went through some internal consultation and also the constitutional process.

3.2 The Report was presented to Members and Strategic Leaders at the following meetings:

- Clearance Board 10 May 2024
- Planning and Development Committee 23 May 2024
- Cabinet 5 June 2024
- Overview and Scrutiny 11 June 2024

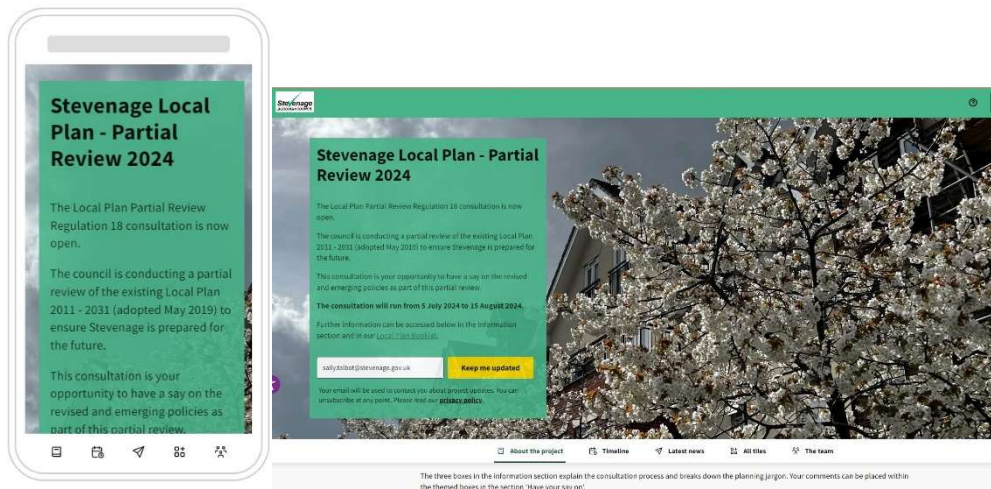
3.3 A summary of the comments made in those meetings and other general comments are set out below.

Name/Organisation	Comments:	SBC Response
Clearance Board	Minor comments to reflect developments since the plan was adopted.	These have been incorporated to reflect these comments.
P&D	Broad support taken for the Regulation 18 approach.	Comments noted and incorporated.
Cabinet	Members were pleased that an updated Statement of Community Involvement (SCI) would highlight the use of technology in the consultation and gave consideration to the need to improve the way the Council engaged with communities in the planning process.  Officers advised that due to the announcement of the forthcoming General Election, the consultation on the Local Plan had been delayed and would now run between 5 July and 15 August 2024.	Comments noted and incorporated.
O&S	Noted the importance of the updated SCI and the improved techniques to engage with communities in the planning process.	Comments noted and incorporated.

## 4 Regulation 18 Consultation (2024)

- 4.1 The Local Plan – Partial Review and Update set out the main changes open for the public to comment.
- 4.2 A Sustainability Appraisal (SA) Scoping Report was published for consultation in accordance with the Strategic Environmental Assessment Directive and Regulations. The consultation formally sought the views of a wide range of consultees, including the three statutory consultees: Historic England; Natural England; and the Environment Agency. The purpose of the consultation was to gauge the views of consultees on the defined scope of the SA and the proposed level of detail that should be included in the SA..
- 4.3 The draft Local Plan Partial Review and Update was prepared and approved for public consultation by Stevenage Borough Council Cabinet on 5 June 2024.
- 4.4 The public consultation exercise was undertaken from 5 July until 15 August 2024. Representations were invited to comment on the Regulation 18 Local Plan document.
- 4.5 Representations could be made using an online consultation system called Commonplace. It was accessed through its own web address and was visible on the Council website, social media accounts. Alternatively, responses could be posted or emailed to the Planning Policy Team.
- 4.7 Our chosen consultation platform, Commonplace has delivered a number of consultations for Stevenage Borough Council, including the Station Gateway Area Action Plan (AAP) and Cycle Hire Scheme. It was considered appropriate because it was suitable for mobile phones as well as desktop users. The design of the site was tailored to hold detailed planning documents and allow consultees to view documents broken down by theme. The platform is designed to help engage residents, businesses and different demographics and by separating topic areas helps respondents comment on areas they are interested in.
- 4.8 Planning documents like the Local Plan can be complicated and use planning language which often disengages an audience. With the help of Commonplace and using best practice, we have engaged more widely. We learnt from previous Commonplace consultations such as Stevenage Gateway Area Action, and other local authorities to build a consultation platform suitable for.
- 4.9 Figure 1 shows how the consultation platform was viewed on a desktop computer or mobile device.

Figure 1: Consultation platform on viewed on a desktop and mobile device.

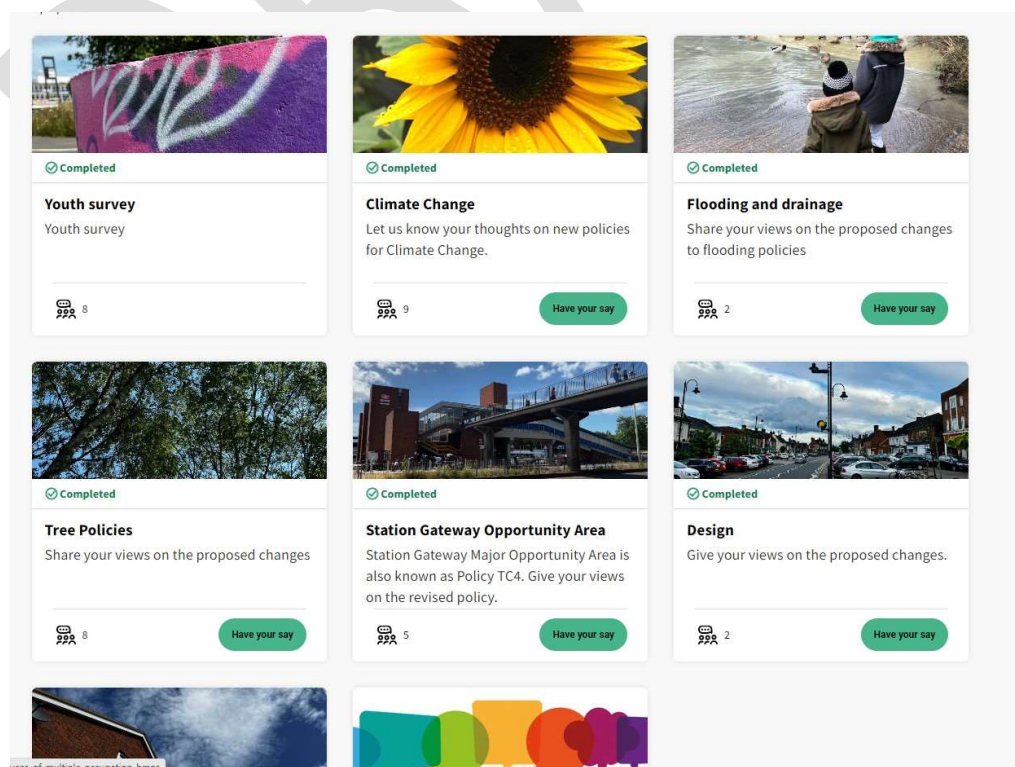


4.10 A direct link to the consultation platform was accessed via a dedicated link:

<https://stevenagelocalplan.commonplace.is/>

The consultation platform breaks down the document into sections to enable a consultee to answer questions based on a topic area within the Local Plan. All sections contain questions, but all are optional to allow flexibility to respondents. The image below shows some of the topic areas on the website.

Figure 2: Breakdown of questions on the consultation platform





4.11 These sections focus on eight main areas in the document, and these include:

- Climate Change;
- Flooding and drainage;
- Tree Policies;
- Station Gateway Opportunity Area;
- Design;
- Housing;
- Youth Survey and;
- General comments.

4.12 The overall aim was to gather consultee views across a wide demographic as well as different types of users in the area. Therefore, the platform had to be suitable for residents, visitors, businesses, and statutory consultees. This can lead to a gap in consultees' proficiency in planning terminology, and the platform was designed with this in mind. Therefore, you could answer as few, or as many questions as you like.

4.13 Formal public consultation period (5 July to 15 August 2024):

A link to the Regulation 18 consultation platform was sent to all individuals who had signed up to the Councils planning consultee register. The register mainly consists of individuals who have responded to previous Local Plan consultations or specific planning applications, and also contains all statutory consultees and Duty to Cooperate bodies, as required by Regulations. Approximately 100 letters were also sent to individuals who had not provided an email address. The letters advised recipients how they would be able to view the document (both electronically and physically) and the process for responding to the consultation. Appendix 2 contains the list of notified consultees.

4.14 The formal consultation consisted of:

- Notification, via e-mail and post where necessary, to all statutory consultees and those on our consultation database.
- A series of dedicated meetings with a range of key stakeholders.
- Publicity via the Stevenage Borough Council website and social media platforms (including the Council's Facebook, Twitter / X and Instagram pages).
- A link to the Council's consultation interface, where the public were able to download the Local Plan – Partial Review and Update documents and were able to submit their observations and representations.
- The consultation interface included a "Youth Survey", designed to encourage the younger generation of the town to register their interest in planning and policy issues and to make valuable input into the process.
- A promotional leaflet was produced and distributed around the town, to highlight that the public could "have their say" on the new and revised policies.
- Ensuring that the consultation could align with the work programme of the broader Communications and Engagement Plan, managed and updated by the Communities & Neighbourhoods team. This was to ensure that the Local Plan – Partial Review and Update could be added to any events / engagement with the neighbourhoods of Stevenage during the consultation, to raise awareness as much as possible.

- Distribution of material publicising the public consultation. This included distribution at Stevenage Central Library, Daneshill House Reception and other locations if necessary.
  - A consultation booklet which covered the broad themes of the Local Plan Review for the public and attempted to answer a series of frequently asked questions or FAQs
- 4.15 A link to the Local Plan – Partial Review and Update Regulation 18 consultation was sent to all individuals who had signed up to the Council’s planning consultee register. The register mainly consists of individuals who have responded to previous Local Plan consultations or specific planning applications and contains all statutory consultees and Duty to Co-operate bodies, as required by Regulations.
- 4.16 Those who provided an e-mail address when registering to the list were sent an e-mail (example in Appendix 4) with a link to the document and an explanation of the consultation process. This consisted of the majority of all consultees. Letters were sent to individuals who had not provided an e-mail address. The letters advised recipients how they would be able to view the document (both electronically and physically) and the process for responding to the consultation.
- 4.17 A series of meetings and discussions were held during the consultation period, with internal and external stakeholders. Internally this included the Development Management, Housing and Climate Change teams; externally this included, in particular, Hertfordshire County Council Growth and Infrastructure Unit, Highways, Spatial Planning, Adult Care Services and Health and Wellbeing teams as well as a range of local landowners and developers on viability issues.
- 4.18 More widely, as part of the Regulation 18 consultation, a series of Memoranda of Understanding (MoU) were prepared and discussed with statutory consultees as detailed in the Statement of Community Involvement [BD11].
- 4.19 Officers have prepared a set of documents, termed as “Memoranda of Understanding” or “MoU” in order for the Council to present its position and work programme regarding the Local Plan – Partial Review and Update.
- 4.20 As part of each MoU, agreement will be sought on the proposed scope of our Local Plan – Partial Review and Update as well as highlighting any areas of discussion or possibly contention, to be recorded and discussed prior to eventual Submission of the Local Plan to the Secretary of State (MHCLG).
- 4.21 Officers have been working with a series of stakeholders, to develop these MoUs. Stakeholders will include:
- North Hertfordshire District Council.
  - East Herts Council.
  - Other neighbouring local authorities in Hertfordshire that share strategic interests (including St. Albans & City District Council, Welwyn Hatfield Borough Council).
  - Other neighbouring local authorities outside Hertfordshire that share strategic interests (including Central Bedfordshire Council, Luton Borough Council).
  - National Health Service (Hertfordshire and West Essex Integrated Care Board or ICB).
  - Hertfordshire County Council (Growth & Infrastructure Unit, Spatial Planning Unit, Highways Department, Minerals & Waste team, other relevant units).
  - Other stakeholders as identified.

- 4.22 Progress on the MoUs has varied to date; in particular, discussions are ongoing with the Hertfordshire and West Essex Integrated Care Board, Hertfordshire County Council, North Hertfordshire District Council and other authorities to develop and agree respective positions up to Submission of the Local Plan – Partial Review and Update
- 4.23 Discussions to develop the MoUs will be ongoing with the various parties before, during and after the upcoming public consultation through the stages of Local Plan preparation, up to Submission.
- 4.24 The Planning Policy team were assisted by the Communities & Neighbourhoods team and in particular, neighbourhood wardens, in promoting the Regulation 18 consultation across Stevenage to ensure a wide a response as possible.
- 4.25 Copies of the Local Plan Partial Review were made available for inspection, along with supporting documents at the following locations:
- Stevenage Central Library
  - Stevenage Old Town Library
  - Council Office, Daneshill House, Danestrete
  - Online via the Councils website
- 4.26 Representations received in respect of the consultation exercise are available to view in full on the Stevenage Borough Council consultation portal. A summary of the representations received are included in this statement.
- 4.27 The representations will be reported to Cabinet, Planning and Development, and Scrutiny and Overview committees, of which the minutes can be viewed online. The views of members will be used to inform the next stage of consultation, Regulation 19.
- 4.28 The representations received to the Regulation 18 consultation will also be used to inform the preparation of the Regulation 19 Local Plan.

## 5 Responses and main issues raised during the consultation

5.1 A total of 327 representations were received from consultees as well as internal teams and committees.

Regulation 18 consultation held between: **5 July to 15 August 2024**

- Commonplace / Email / Letters: **202** respondents **327** comments
- Youth Survey: **9** respondents;
- **Over 2,500 visitors** to the consultation interface website;
- Stakeholders; Meetings with HCC (comments not included in numbers)
- Social Media comments (not included in numbers)

**Total: 201 respondents / 327 comments or agreements\***

\* An agreement is another consultee agreeing with another representation. The consultation platform allows consultees to agree or disagree with comments already submitted.

5.2 Responses were received from:

- North Herts Council
- HCC – (Growth, Minerals & Waste, Public Health, Highways, LLFA,
- Muse
- Anglian Water
- Three Rivers
- Thames Water
- TfL
- North Herts and Stevenage Friends of the Earth
- Sport England
- Turley on behalf VASTINT UK SERVICES LIMITED.
- NHS Property Services
- NHS HWE ICB
- National Gas Transmission
- Muse
- British Horse Society Herts Access Committee
- Historic England
- Home Builders Federation
- Forestry Commission
- Environment Agency
- Stevenage Cycling UK
- Churchill Living and MacCarthy Stone
- Central Bedfordshire Council
- Anglian Water
- HCC - LLFA

- HCC - Sustainability Team
- HCC - Highways
- HCC - Minerals and Waste
- HCC - Public Health
- SBC – Housing
- Members of the public

5.3 A full summary of responses is provided in Appendix 2 as well as an overview of any recommendations to be taken forward for consideration when drafting the next stage of the Local Plan.

5.4 A wide range of themes emerged from consultation comments, including some of those highlighted in table 1.

Table 1:

Theme	Comments
Climate Change	<p>Positive thoughts on Climate Change – Many support reducing carbon emissions at all stages of the development process, as many hold sustainability as a core value within their work.</p> <p>There are many reservations regarding viability and whether the use of the building regulations is enough in policy. The Written Ministerial Statement in December 2023 cemented that Local Plans could not go above targets – this was challenged in July 2024. So careful consideration needs to be placed on Policy CC1 if it is to work.</p> <p>Many feel it is not clear what emission reduction targets are being used and it is important that this is investigated further to ensure that requirements are feasible whilst not significantly undermining the deliverability of development in the town, and in accordance with the NPPF. Construction costs and other challenges have made the delivery of development challenging and consultees wish for string evidence to ensure it doesn't impact development.</p> <p>More need to exploit the Green Economy.</p> <p>Stronger emphasis on transport and the use of Active Travel to tackle climate change as well as stronger wording for retrofitting may need to be considered within the policy wording.</p>
Trees	<p>General support but attention to light pollution and potential hazards of leaf drop for cyclists / biodiversity etc.</p> <p>The introduction of tree lined streets in new developments was welcomed, due to increasing biodiversity and good design and mitigating climate change.</p>
Station Gateway	<p>Generally positive for uses and change in the opportunity area.</p> <p>Comments broadly support the changes to the overarching spatial strategy for the Local Plan which shows an update to the use classes and development focussed within the Station Gateway Opportunity Area. This is once again in line with the updated climate change policy.</p>
Design	<p>Comments generally focused on Design in general. This included improvements to Policy SP8 to accommodate healthy and safe communities. Design of the cycleways was mentioned and how they are used for active travel and to help mitigate climate change.</p>
HMOs	<p>Not generally against HMOs due to the positive need for affordable housing, but the consultees expressed concern around parking in already pressurised neighbourhoods. Some comments expressed the need for</p>

Theme	Comments
	better cycle parking for HMOs to encourage better forms of travel and alleviate parking problems in some neighbourhoods.
Flooding and drainage	There is support for the changes to Policy FP1 aimed at ensuring utilisation of sustainable drainage systems wherever possible, including the incorporation of green infrastructure such as ponds and green roofs/walls where appropriate. Consultees have also welcomed the emphasis in Policy FP2: Flood risk management on the re-naturalisation of watercourses, which can benefit local biodiversity as well as enhancing flood defences. However, there have been comments surrounding paved areas incorporating better SuDS design and consideration around the classification of pollution to include odour pollution which can be viewed alongside light and noise pollution.
Youth Survey	The theme around tackling climate change was considered a top 3 important challenge for most of the respondents (out of 8 options). Generally positive for Climate Change but there was a desire for a stronger local economy with affordable housing and more leisure facilities.

5.5 Other comments arising from the consultation can be summarised as follows:

Table 2 – Other comments:

The consultation focused on partial changes but other comments were welcomed. They are summarised below and will be considered with the review process and responded to accordingly.
<ul style="list-style-type: none"> <li>• Housing allocations – Some comments regarding our delivery and the need to address this post 2031. A full review has been recommended sooner, by some consultees. This will be addressed before the Regulation 19 consultation to show the Council’s approach will address the housing delivery targets.</li> <li>• Housing allocation sites – HO1/13 Scout Hut, Drakes Drive – A large number of consultees objected to the loss of the site as a community use. The detailed policy in the Local Plan stipulates “<i>the community facility to be reprovided or its loss satisfactorily justified</i>” (page 104 SBC Local Plan). It is possible that the wording may need to address the concern raised by the consultees by making it clearer.</li> <li>• Green infrastructure links – Incorporation of tracks for horses / recognition within the Local Plan.</li> <li>• Health and wellbeing – Hertfordshire County Council are studying land uses in close proximity to deprived neighbourhoods. Suggestion for a new policy for Bedwell.</li> <li>• Retail Study 2024 – Some comments and recommendations have been considered from the draft report. The study also takes account of changes to the NPPF, which will need addressing now, whilst some changes will be considered for a Full Review.</li> <li>• General from Facebook / Twitter / Instagram – few comments received which were commenting on the general vitality of the town, and a mix of retail in the town centre.</li> </ul>

- 5.6 While the total volume of representations may appear relatively low for a Local Plan consultation, it should be acknowledged that this is only a partial review of the existing, adopted Stevenage Borough Local Plan and that the Regulation 18 stage formed the initial stage of consultation, with further rounds of consultation ahead.
- 5.7 The Cabinet Report in June 2024 initially outlined a proposed Regulation 18 consultation period from 17 June 2024 to 28 July 2024. However, soon after Cabinet approval, the General Election was called for 4 July 2024. As such, the consultation had to be delayed until at least 5 July 2024 and thus ran into the busy Summer holiday period.
- 5.8 The Regulation 18 consultation could not be delayed further until September, as this would have resulted in the risk that the Regulation 19 Local Plan – Partial Review and Update would not be consulted on until after the revised NPPF was published. The potential impact on material weight of the Local Plan was another risk in this regard as discussed below.
- 5.9 In accordance with paragraph 48 of the NPPF (December 2023) with regards to the determination of planning applications, it states:

*Local planning authorities may give weight to relevant policies in emerging plans according to:*

*a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*

*b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*

*c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

- 5.10 Based on the above, policies of emerging Plans gain weight as they progress through the process of consultation, examination and whether they attract objections. Therefore, the weight that can be applied to the policies contained in the Stevenage Local Plan – Partial Review and Update are set out as follows:
- Low Weight – Regulation 18 pre-consultation.
  - Moderate Weight – Regulation 18 post-consultation.
  - **Substantial weight – Regulation 19.**
  - Full weight – Adoption.

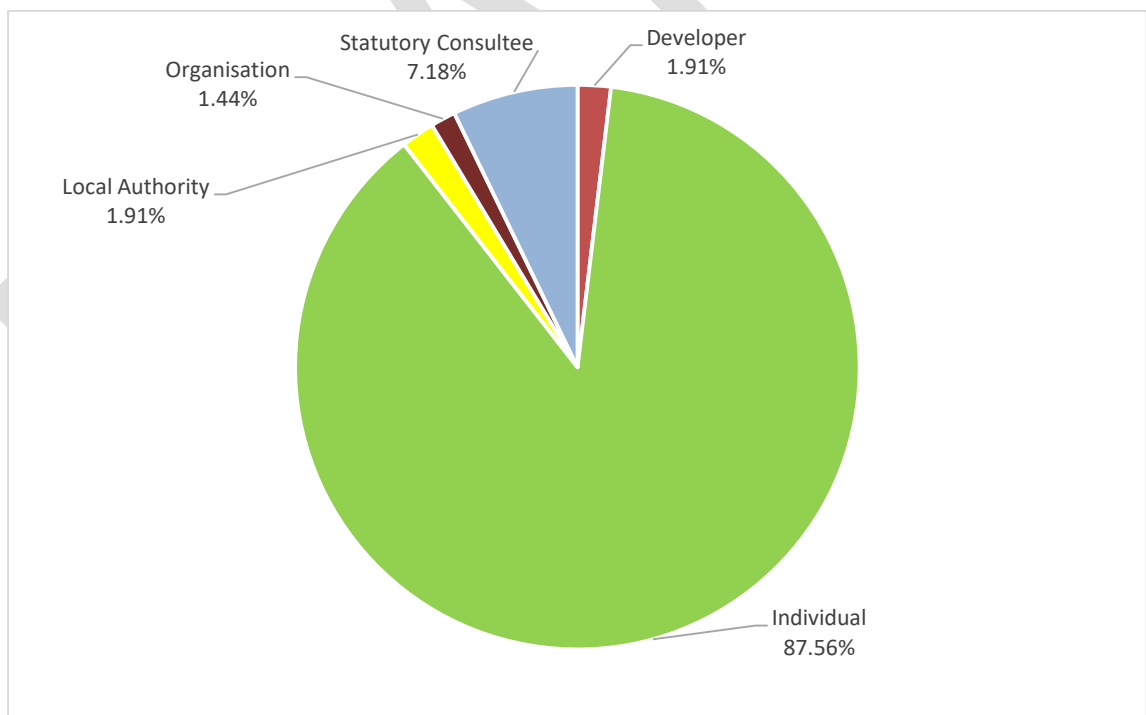
## 6 Analysis of representations

6.1 The analysis was broken down by topics to understand the main themes. Appendix 1 shows the full list of responses and are separated in the following categories:

- Climate Change
- Flooding and drainage
- Trees
- Station Gateway Opportunity Area
- Design
- HMOs / Housing
- All Other Comments

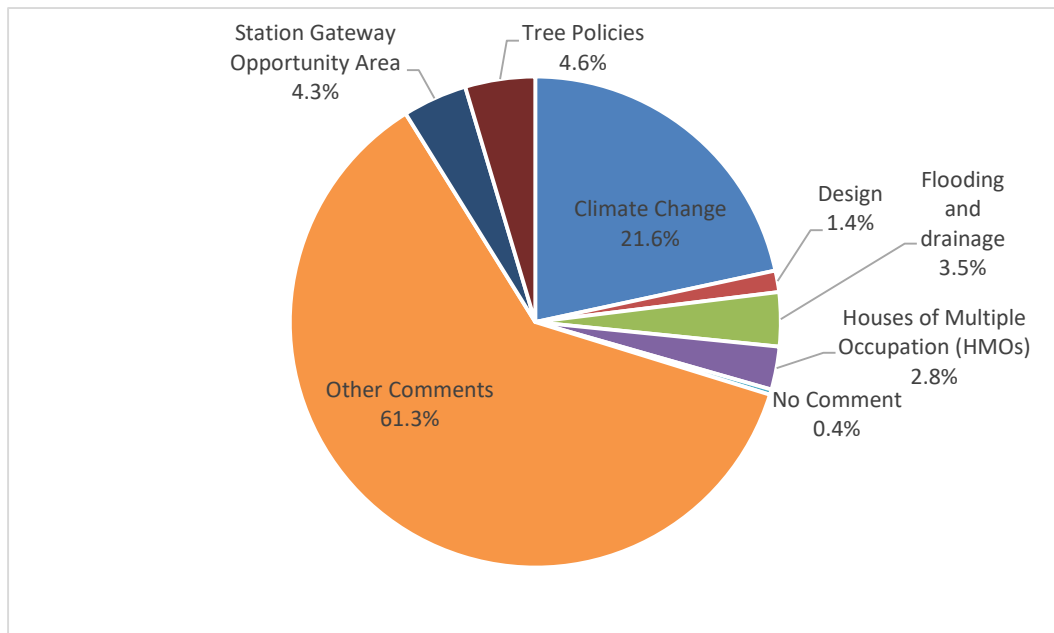
6.2 Figure 1 below shows the type of respondents who responded to the Regulation 18 consultation.

Figure 1 – Type of respondents.





6.2 Figure 2 below shows the breakdown of comments received by theme / chapter.



6.3 Key messages received from the consultation included general support for the Council's commitment to Climate Change and the environment. There is some negativity or wariness regarding the viability of pursuing Climate Change in the policies and the Officers have worked intensively with consultants, consultees and the public to make sure the policies are designed correctly.

## 7 How has the Council responded to these comments?

7.1 A complete schedule of consultation responses and the Council's response to the comments are provided in Appendix 1.

7.2 The opinions and views of the public will be considered when we work through the Local Plan and prepare a revised version for the Regulation 19 consultation.

7.3 In the time that has passed since May 2019, the proposed number of significant changes to the planning system has led to the Planning Policy team to scope out the changes and incorporate amendments which reflect the drivers for change. After reviewing the comments, officers have amended the draft accordingly. A brief overview of changes is shown below.

### ***Changes from Regulation 18 to Regulation 19 versions***

7.4 The comments and suggestions from the Regulation 18 public consultation are below and will be incorporated into the final draft Regulation 19 version to be presented to, and approved by, the Cabinet.

- 7.5 The key amendments to the draft Local Plan Review – Partial Review and Update, from the Regulation 18 to the Regulation 19 version, can be summarised below:
- *Policy SP1: Climate Change* – emphasis on the need to prioritise sustainable travel added; requirement to install network infrastructure removed; policy now commits the Council to working with neighbouring authorities on cross-boundary Climate Change opportunities.
  - *Policy SP2: Sustainable Development in Stevenage* – emphasis on the intention to meet the needs of an ageing population.
  - *Policy SP5: Infrastructure* – the term “sheltered housing” replaced with “adaptable and specialist housing”.
  - *Policy SP6: Sustainable Transport* – comprehensive rewording to strongly emphasise sustainable transport.
  - *Policy SP8: Good Design* – added a requirement to ensure that development is safe and reduces crime.
  - *Policy CC1: Energy Efficiency* – carbon targets for minor developments removed; carbon targets for large-scale major developments now exclude sites in the Town Centre; cash offsetting removed; monitoring limited to one occasion, immediately following occupation.
  - *Policy CC2: Heating and Cooling* – hierarchy replaced with list of considerations; only requirement is now to avoid energy-dependent cooling (unless essential); only major developments need to demonstrate how heating and cooling will be provided within an Energy Statement.
  - *Policy CC6: Green Roofs and Walls* – green roofs now encouraged rather than required; a reference has been added to “blue-green” roofs.
  - *Policy CC7: Green Economy* – Regulation 18 draft policy CC7: Digital Connectivity has been deleted; Regulation 18 draft policy CC8: Green Economy has moved up to take its place and is now CC7.
  - *Policy EC1: Allocated Sites for Employment Development* – allocation for EC1/2 (South of Bessemer Drive, Gunnels Wood) has been changed from office and research and development use, to light industry, general industry and storage / distribution use.
  - *Policy IT1: Strategic Development Access Points* – a line has been inserted to ensure that the design of new junctions considers the needs of all road users.
  - *Policy HO10: Sheltered and Supported Housing* – it has been made clear that there is broad support for sheltered and supported housing schemes, regardless of scale.
  - *Policy GD2: Design Certification* – a line has been inserted to encourage “Secured by Design” accreditation.
  - *Policy FP2: Flood Risk Management* – various minor amendments to reflect the comments from the Environment Agency.

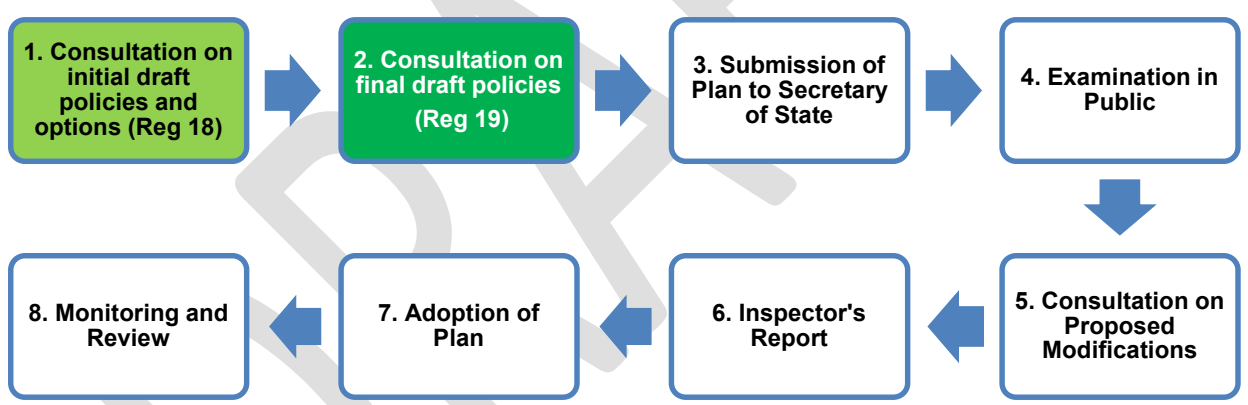
- *Policy NH5b: Tree Lined Streets* – new subtext to emphasise the importance of species and techniques for street trees; new subtext to clarify that active transport remains the priority for streets
- Monitoring provisions have been added for the new Climate Change policies.
- *Policy TC4* - Minor changes to reflect comments from Muse and Hertfordshire County Council.
- *Policy SP4* – Minor changes to reflect evidence from the Retail Study 2024.
- *Policy TC10* – Minor changes to reflect the Retail Study 2024 and NPPF.
- *Policy TC9* – Minor changes to reflect the Retail Study 2024 and NPPF.
- Minor changes to subtext across new and previously revised policies.

7.6 These key amendments to the draft Local Plan Review – Partial Review and Update will assist in the preparation of the Regulation 19 Local Plan.

DRAFT

## 8 Next Steps

- 8.1 Following Regulation 18 consultation from July to August 2024, we are approaching the second stage of development of the Local Plan – Partial Review and Update. This forms the “consultation on final draft policies” stage under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 [BD12].
- 8.2 Following the Regulation 19 round of consultation, the Local Plan – Partial Review and Update will then be submitted to the Secretary of State (MHCLG), ahead of an independent Examination in Public by an appointed Planning Inspector.
- 8.3 A final consultation on any modifications proposed by the Inspector to the Plan is then held prior to the Inspector’s Report, which would confirm whether the Plan can proceed to formal adoption. Monitoring and review of the Plan would then be required for a period of time after the Plan has been adopted.
- 8.4 The diagram below shows the next steps in the Local Plan process.



**Appendix 1 – Responses to the consultation and Stevenage Borough Council response**

SBC Comment ID	Theme of Comment	Local Plan Policy No.	What are your comments on the revised policy SP1, SP11?- Climate Change	General comments on Climate Change policies	SBC_Response

4	Climate Change	CC1	<p>There is no reference to transport so the following should be added.</p> <p>The domestic transport sector remains the largest emitting sector in the UK, accounting for 29.1% of all greenhouse gas emissions in 2023. <a href="https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/121111/uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf">uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf</a> (<a href="https://publishing.service.gov.uk">publishing.service.gov.uk</a>)</p> <p>The Local Plan must include how a modal shift towards more sustainable travel choices is to be achieved. In all cases, the most up to date national guidance should be adhered to including the Active Travel England Standing Advice Note: Active travel and sustainable development <a href="https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/121111/active-travel-and-sustainable-development-ate-travel-sustainable-development.pdf">ate-travel-sustainable-development.pdf</a> (<a href="https://publishing.service.gov.uk">publishing.service.gov.uk</a>)</p> <p>Cycling must be at least as convenient as driving for all short journeys. This includes provision of direct routes and convenient cycle parking. Multi-modal journeys involving cycling and use of public transport must be facilitated to make them an attractive alternative to private car use.</p> <p>Cycle parking should be prioritised for all developments of residential properties, workplaces, retail outlets, leisure facilities, transport hubs and all other beginnings and destinations for cycle journeys. Cycle parking should be added whenever possible to existing properties and prioritised where refurbishment of any council property takes place. Long stay cycle parking “including at residential properties” should be secure, weatherproof, conveniently sited and easy to use by all users. It should be suitable for all types of cycle including cargo bikes and adapted cycles. Provision for electric bikes should include charging facilities. Users should not be expected to lift cycles or access through narrow gaps or paths.</p> <p>Stevenage has 45km of cycleways but there are significant gaps in the provision. For example, many access roads have been built across cycleways and there is a lack of traffic-free cycling infrastructure in and to newer residential and retail developments. Whenever possible, these gaps should be rectified. New developments must always have cycling links to the existing network built in line with national planning guidance eg LTN 1/20 and current best practice to ensure that they are suitable for cyclists of all ages and abilities from 8 to 80 and beyond. Cycle routes should be inclusive, and users of all types of cycle should be able to navigate them safely and easily. The use of barriers and bollards must be avoided to enable access by people using non-standard cycles such as tricycles, cargo bikes and adapted cycles. Cycles may be being used to transport children or heavy luggage eg shopping.</p> <p>Routes should be safe and pleasant to use at all times of day and throughout the year. They should be direct, well-lit and avoid steep gradients and steps. People cycling should never be expected to lift their cycle up a kerb or push their cycle to reach cycle parking at a destination - in some cases a cycle is used as a mobility aid by individuals who cannot walk far.</p> <p>Signage must be made clear to enable people cycling to find their way around the town. Road markings at new developments should reflect cyclist and pedestrian priority as in the Highway Code.</p> <p>Planting adjacent to cycleways should be chosen to minimise the need for pruning back, clearing leaves. Prickly plants and fast-growing plants should be avoided.</p> <p>Climate adaptation measures need to include good drainage for cycleways and provision for flood management and preventions especially in underpasses.</p> <p>Good provision for Active Travel will have additional benefits for the local economy and public health.</p>	-	<p>Noted.</p> <p>Actions:</p> <ol style="list-style-type: none"> <li>1. Consider new/amended policies to make clear that sustainable transport should be prioritised.</li> <li>2. Consider new/amended policies for the protection of existing cycleways and provision of new cycleways in development proposals.</li> </ol>
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11	Climate Change	SP1, CC1, CC2, CC3, CC4, CC7	<p>While fully supporting the net zero objective, as a general comment, this policy and the others in Chapter 6, do not seem really aware of the cost they impose, whether build, delay, consultant availability or indeed officer time.</p> <p>The shopping list is long – energy/cooling statement, net zero operational carbon, ditto lifetime embodied carbon, a carbon tax, 5 year monitoring, Housing Quality Mark, SuDS and green roofs, rainwater harvesting, grey water recycling, new streets to be tree-lined. Most of these are mandatory, and applicable even to minor development. As a developing housing association operating through Herts and Beds, these demands, taken cumulatively, would really make us think twice about Stevenage.</p> <p>Some policies, perhaps for flexibility, are short on specific guidance to developers</p> <p>SP1 a : Demand Reduction, Energy Efficiency, LZC Generation</p> <p>Query the assumptions here ie the conventional Fabric First energy hierarchy. Electrification First is now a smarter route to zero carbon, since further demand reduction via insulation now suffers diminishing returns; and anyway one cannot insulate/reduce demand all the way to net zero, esp not for hot water. Moreover, onsite renewable power (PV), which has a quite high cost per kW, now displaces less and less emissions.</p> <p>The government’s proposed spec for the Future Homes Standard recognises this, by mandating an end to gas, proposing PV as an option not for net zero reason (ie to save on bills), and only requiring a few carefully selected upgrades for heat loss (eg closing the performance gap, better airtightness)</p> <p>Proposed wording for SP1 a:  – support developments that achieve reduced or zero onsite emissions via low carbon heating, together, as appropriate, with reduced heat loss and/or onsite generation of zero carbon energy</p> <p>SP1 b: On-site Shortfall and Offset Fund;  – On site short fall needs clarification, given that post 2025, Future Homes - burning no fossil fuels - will produce no emissions on-site. Continuing off-site indirect emissions, from power station chimneys, are quite short term and outside building owner or planning control. Should virtuous new homes be penalised? The problem is the stock.</p> <p>Proposal for SP1 b:  – Clarify that the test is onsite emissions and that offset does not apply to all-electric homes</p> <p>SP1 c: Water Usage Targets, Rainwater Harvesting and Grey Water, Water Neutrality; OK with water targets.</p> <p>Query the definition of water neutrality, – not increasing demand for water abstraction above existing levels (support text, not glossary), as this seems to imply, for a green field site with zero existing abstraction, absolutely no mains water use. Roof harvesting and grey water recycling are fine for saving potable water, but not without downsides (respectively, reduced groundwater recharge, and increased concentration of pollutants), and potable water reduction has limits: 100% reduction would imply that people should drink, cook or wash in rainwater, and that each home has its own water and sewage works.</p>	<p>Policy HO8 (Affordable housing tenure, mix and design) ought to be revised to reflect the new government’s strong commitment to social rent. The current policy merely requires that at least 70% of the units are for rent, without clarifying affordable rent or social rent. Perhaps a way can be found to do this in parallel with the partial review</p>	<p>Comments acknowledged and noted.</p>
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		<p>There are other practical issues (space for plant, ongoing and decentralised hygiene maintenance). Green roofs can also frustrate roof water harvesting.  Proposed wording for SP1 c:  “apply water usage targets to developments, and encourage proposals to minimise the demand for new potable water supplies”</p> <p>SP1 d. Life Cycle Sustainability  OK but needs to be subject to cost being practicable. Zero embodied carbon is too radical a goal. It might mean for example, promoting building in timber (which captures carbon) while banning it in concrete (whose manufacture generates carbon).</p> <p>SP1 e. Microgrids, Heat Networks, and Intelligent Energy Systems;  How would this policy work in practice, over and above the government’s proposals for heat network zoning?</p> <p>SP1 f. Low Carbon CHP  Disagree strongly: ultra-low and zero carbon CHP is surely a contradiction in terms, as CHP relies on burning fossil fuels; by contrast renewable power generation (wind, sun) has no waste heat. Renewables are cool, literally.  Proposal for SP1 f:  “Delete this subsection</p> <p>SP1 g. Development that Generates Low C Energy  Agree. But why only those with a surplus to be injected into the national grid</p> <p>SP1 h. Carbon Sinks, Carbon Sequestration;  Agree, but surely sinks and sequestration is quite minor in such an urban setting. Have you costed carbon sequestration in a housebuilding context?</p> <p>SP1 i. Green Roofs and Walls;  Nice to have. Quite a tough stance on cost; but have you calculated the value of the benefits?  NB green roofs and roof water harvesting (as in sub section c) can be mutually exclusive</p> <p>SP1 j. Reduce Travel by Installing of Digital Infrastructure;  Query need for a policy, as ultrafast broadband is now available virtually everywhere in Stevenage, and developers need no compulsion to install fibreoptic cable. The issue is with existing homes.</p> <p>SP1 k. Green Economy  Agree. A well-meaning policy, if somewhat vague</p> <p>SP1 l. Site Waste.  Agree</p>	
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12	Climate Change	SP1	<p>Good, but could usefully add that you will evaluate proposals for non-motorised travel to/within the development, including the provision of new bridleways (i.e. routes for walkers, riders and cyclists).</p>	-	<p>This is worthy of consideration. Reducing transport-related carbon emissions by facilitating a modal shift away from private cars to more sustainable modes of transport, especially walking and cycling, is a key objective of the plan. The view of officers thus far is that this is adequately expressed in Policy SP6. However, it could perhaps be strengthened and also set out under Policy SP1 to reflect the significant link between transport and climate change.</p> <p>Actions:</p> <ol style="list-style-type: none"> <li>1. Consider strengthening Policy SP6.</li> <li>2. Consider amending Policy SP1 to reflect the strategic aim of facilitating a shift to sustainable modes of transport.</li> </ol>
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21	Climate Change	<p>Two themes:</p> <p>Transport - is not very well mentioned in the document.</p> <p>Wildlife - we have so much - lets help it.</p> <p>Transport - we must ensure that active travel is not only possible but becomes the first choice when planning a trip to the local shops etc. This means that parking for cycles and access to cycles needs to be easier than taking the car. Parking must be located conveniently outside all destinations and residential properties. It must be secure and all long term parking must be protected from the elements too.</p> <p>Routes for cycling need to be well signposted, direct and easy to use. The motorised traveller needs to be taken from place to place by a less direct route when possible to deter them. (BTW I am writing this as a driver). Once we get more drivers using active travel the issues of space on the roads will become less since there will be less cars. The routes need to be well maintained (not over grown with vegetation, pot holed, adverse camber, loose surfaces) well lit and easy to find (Access from local roads all need to be signed).</p> <p>Our parks have many routes through them that are (footpaths) regularly used by cyclists already. If these routes were widened and made officially Shared use then cyclists would have many more useful, direct, traffic free routes to use legally. I have been discussing these ideas with Councillor Simon Speller who is portfolio holder on this area. In addition I am proposing an additional route around south field FVP to mimic the originally planned but abandoned Road 9 route. This would be an amenity route for use by leisure cyclists and walkers but the addition of a hard surface (not necessarily tarmac) that would add a suitable leisure route for all users (disability vehicles too). This would be an appropriate 80th Birthday celebration for Stevenage New Town.</p> <p>Wildlife - the cycleway network could be an excellent start to building wildlife corridors to link up the amazing woodlands and open spaces within Stevenage. They need careful thought and planning but the potential is huge and could easily increase the biodiversity of Stevenage. Planting a (carefully chosen) range of native and cultivated (dwarfing rootstock) trees and shrubbery along these routes on the currently barren grasslands (a bit like on the motorway verges) could open the routes to wildlife too. It will be important to use cycle friendly planting next to cycleways so that they don't get overgrown nor that the clippings MUST not be thorny!</p> <p>Encouraging locals to add Bat boxes, bird boxes and wildlife friendly gardens could only help with this plan too. My house backs onto a Park - I garden for wildlife - but I can name 20 species of birds that visit, we have frogs and dragonflies, Damselflies etc, I hear deer, foxes and owls.</p> <p>Stevenage is in probably the best situation regarding biodiversity since it has so much existing woodland and open space this can only be enhanced by these ideas.</p>	<p>My feeling is that all climate change policies must be strengthened.</p> <p>It should be the default for all new and refurbished properties to include solar, heat pumps, water recycling etc There must be as few get out clauses for developers as it is possible to have in these documents. We are truly facing a world disaster.</p>	<p>Comments acknowledged and noted.</p>
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26	Climate Change	SP1, CC1, CC2, CC3, CC4, CC5, CC6, CC7, CC8	Should green / zero carbon transportation and connectivity be considered as part of this policy? Developments that enhance cycle / walking infrastructure or enhance public transport schemes should be strongly supported.	-	
27	Climate Change	SP1	<p>Climate Change:</p> <p>We need a quick plan to kick start a change in attitude from all members of the town and also visitors. I suggest :</p> <p>Traffic warden be empowered to fine motorists who sit with their vehicle engines running to keep warm? col.</p> <p>Improve the drainage in the town centre, particularly the Forum, where drains are often clogged and ineffective, and in the High Street where ancient downpipes are not connected to the main surface water drains.</p> <p>To clear the gutters on roadways on a regular maintenance schedule, perhaps linking with HCC, to ensure torrential downpours can be safely and quickly dealt with.</p> <p>All new commercial building planning applications must, as of 1st January 2025, contain solar panels and grey water management as well as shaded parking -either through solar panels, trees or green roof shaded structures.</p> <p>Schools, educational establishments and community buildings to add native hedging to their boundaries. This will improve the air quality, reduce noise, add shade and wildlife habitats and improve mental health. These areas will also be ideal for planting small groups of native trees, both deciduous and coniferous for diversity. It is better than planting more trees on the streets where there is a possibility of tree roots damaging drains, leaves clogging the gutters and foundations of houses being at risk.</p> <p>Solar panels on schools generate most electricity in the summer when their need is least. Empowering the schools to sell the excess electricity to the national grid would generate income for the school to use to improve the children's opportunities as well as giving a very important message on non fossil fuels to the town. This may just need an administrative change for a large effect.</p> <p>Stevenage seems the ideal place to lead the country in creating green roofs. There are so many bus stops, covered walkways, shopping areas that could be transformed by the addition of a sedum or wildflower roof, provided the feral pigeons could be prevented from destroying them.</p> <p>Greening the bridges: there are many urban settings that have created pleasant and calming walk ways, wildlife habitats and carbon capture areas by greening the bridges in their town. There is a great opportunity, long term as the station is redeveloped, to make the existing bridge a joy to see as you enter Stevenage.</p> <p>To reduce short car journeys in the town, the provision of a free electric shuttle between the former Roaring Meg and the Forum would encourage shoppers to use both sites without needing to use a car or negotiate the narrow pavements, which are often used as a cycleway, that link the two. Ideally in the long term a green bridge with a separate cycle way would be developed with side bridges to other areas.</p> <p>Water usage: Affinity water has for many years worked with schools to help to encourage children to use water wisely. Perhaps, they could be approached to help reduce water wastage in public buildings, dripping taps, inefficient toilet cisterns etc. It surprises me the amount of water used, presumably not recycled, to wash cars in stores' carparks. The taps at the Lister Hospital are programmed to keep running long after the handwashing of the most rigorous kind has finished. The prospect of many more homes outlined in the plan can only make the situation more acute. The</p>	-	The council cannot revisit development that has already been implemented through the local plan, nor can it tackle issues other than development (e.g. the powers afforded to parking wardens). However, the plan does propose policies to require appropriate SuDS, green roofs and low/zero-carbon technologies.

situation needs to be tackled by the council now as many in the town are unaware of the very low rainfall, the abstraction of water from the rare chalk streams and the serious levels of waste of this precious resource.

i am pleased that there has been a further consultation on the local plan.

I hope that my comments can be of use and that swift action is taken, making sure the people of the town know what is happening and why, so we can work in harmony with your vision. The heart of the town is its people and they need to know what is happening. The future of our town is our children and they need to be part of the plan

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104	Climate Change	SP1, CC1, CC2, CC3, CC5, CC7	<p>I feel that given that the council has declared a climate emergency the language choices in this document are too wooly and not forceful enough.</p> <p>For example "encourage the sustainable use of all other resources throughout the development life-cycle;" this should read "enforce the sustainable...."</p> <p>This is really truly an emergency and SBC must be seen to be taking it seriously.</p> <p>All new properties (both industrial and residential) should have good quality cycle parking, solar panels fitted and E-car charging points included as standard. not simply be suggested as a nice thing.</p> <p>Any new road construction must include associated segregated cycleway by default - I know that this is not within SBC remit but you can call for it in your planning meetings.</p>	-	Comments acknowledged and noted.
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107	Climate Change	SP1	<p><b>POLICY SP1: CLIMATE CHANGE</b></p> <p>While we welcome the proposed new Policy SP1, we believe it should be expanded to include sections that address energy efficiency and the retrofitting of existing (including historic) buildings. Approximately one quarter of the UK’s building stock is at least 100 years old, and these buildings can and must adapt, not only to support the transition to a Net Zero society, but also to improve energy/cost-efficiency and thermal comfort for occupants, and to ensure they remain safe, desirable and viable assets for future generations to enjoy.</p> <p>Mitigating climate change and conserving historic buildings are compatible goals. Keeping historic buildings in use through sensitive repair, maintenance, and adaptation can help lower carbon emissions, reduce reliance on fossil fuels, and decrease energy costs. Additionally, the most sustainable building is one that already exists. The ongoing repair, maintenance, use, and re-use of historic structures prevent the unnecessary release of embodied carbon associated with the materials, transport, and processes involved in demolition and new construction.</p> <p>Further guidance can be found in our new Advice Note on adapting historic buildings for energy and carbon efficiency, published in July 2024. This document provides clarity and supports consistent decision-making for proposals aimed at reducing carbon emissions and improving the energy efficiency of historic buildings. It reflects current national planning policy and includes clear advice on insulation, boilers and heating systems, heat pumps, draft-proofing, replacing or adapting windows, and installing solar panels.</p> <p>You can access the Advice Note via the following link:</p> <p><a href="https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/heag321-adapting-historic-buildings-energy-carbon-efficiency/">https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/heag321-adapting-historic-buildings-energy-carbon-efficiency/</a></p> <p>Our recommendation:</p> <p>Expand Policy SP1 to include energy efficiency and retrofitting or include a new separate policy that addresses these issues.</p>	-	
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170	Climate Change		On page 72 mention is made of dealing with Climate Change. In 2009 Professor Ken Pease published a paper on "The Carbon Cost of Crime and Its Implications" (Research, Case Studies & Guidance (securedbydesign.com)). In this paper Professor Pease showed that crime has a carbon cost, he calculated that, in 2029, a dwelling burglary generated two and a half tonnes of carbon. This included the Police investigation, replacement of missing goods and even the fact that most victims n move home as they no longer feel safe in the property. By achieving accreditation to SBD, the risk of becoming a victim of dwelling burglary can be reduced by over eighty percent. This is a dramatic reduction in the potential carbon footprint of a building over its lifetime. And demonstrates the benefit of SBD in dealing with Climate concerns.	-	Comments acknowledged and noted. Consideration has been given. Policy SP8 updated to include reference to reducing crime and the fear of crime in new developments.
175	Climate Change	SP1	What is there is good, but it is lacking anything about sustainable travel modes. Walkable access to amenities like retail and healthcare, and good public transport provision are necessary to tackle climate change.	looks good	Comments acknowledged and noted.
177	Climate Change		We generally support the changes to the vision and objectives. The main spatial planning topics are suitably reviewed with comprehensive detail, and we welcome the direction of travel in relation to climate change. Further changes to policy relating to trees and woodland, and flooding and drainage are also supported and are considered in line with climate change policy.		Comments acknowledged and noted.
180	Climate Change				Comments acknowledged and noted.
183	Climate Change			I object to the climate change policy in its current form and have the following criticisms and proposals. General comments: 1. The language regarding that future developments will likely have solar panels should be stronger. They should be required in most circumstances. 2. Included information should be that domestic transport accounts for over 29% of emissions in the UK. Also, that cars and taxis are responsible for 55% of these transport emissions, the largest emitters within the transport sector. ( <a href="https://assets.publishing.service.gov.uk/media/6604460f91a320001a82b0fd/uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf">https://assets.publishing.service.gov.uk/media/6604460f91a320001a82b0fd/uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf</a> and <a href="https://www.theccc.org.uk/publication/understanding-the-requirements-and-barriers-for-modal-shift-wsp/">https://www.theccc.org.uk/publication/understanding-the-requirements-and-barriers-for-modal-shift-wsp/</a> ). 3. Relative to its share of total emissions, the attention for the impact of planning on modal shift is disproportionately small. It should	Comments acknowledged and noted.

				<p>receive much more attention.</p> <p>4. The council has acknowledged in their policies that how people live, and the cycle friendliness of the destination is an essential consideration for promoting modal shift. Combined with the low footprint of cycling, cycle facility requirements are highly relevant for many aspects of this partial review. This must be included in the text.</p> <p>5. A building that does not encourage active travel and the use of public transport cannot be considered future-proof in the context of climate change and achieving net-zero, given that net-zero is incompatible with high rates of private car use.</p> <p>6. The text should mention that shifting from internal combustion engines to EVs does not make net-zero achievable. Net-zero requires a modal shift towards a combination of active travel and public transport.</p>	
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184	Climate Change	<p>Specific proposals:</p> <ol style="list-style-type: none"> <li>1. New developments should make cycling more attractive than driving, through strategically situated cycle parking and a safe convenient way to access this when arriving and leaving. The access path should be inclusive meaning that everyone from 8 to 80 should be able to navigate it.</li> <li>2. In a residential development, cycle parking should be conveniently accessible from inside the building and have its own exit to outside.</li> <li>3. Cycle parking in all developments should have national or international certifications, or other convincing documentation that demonstrates that it is inclusive and can be used by everyone from 8 to 80 (8 to 80 is used in LTN 1/20) with different types of bikes, including cargo bikes and adapted cycles for mobility purposes.</li> <li>4. Residential and employment cycle parking should have sufficient power sockets to charge e-bikes.</li> <li>5. New neighbourhoods or developments that border existing developments or border land where future developments might take place should include convenient cycle routes through them and ensure that a connection to a future neighbourhood is spacious enough.</li> <li>6. Cycle paths should adhere to the newest government standards, be well lit, be pleasant to use for different types of cyclists.</li> <li>7. Cycle parking must be made to be required when any changes/improvements made to existing properties are made.</li> <li>8. Cycle routes onto (or through) developments should be as clear and direct as those for other vehicles, which might mean that cycles will require to be given priority.</li> <li>9. Destinations should be conveniently reachable by bicycle with parking close to the entrance of a destination. This is essential to encourage modal shift, which requires cycle convenience to be high.</li> <li>10. Measures need to be taken to guarantee that active travel routes do not become overgrown by planting.</li> <li>11. Parked cars on cycle ways or directly in front of cycle parking renders them useless. Measures must be taken to make this impossible.</li> <li>12. New developments that are adjacent to important cycle routes should have links to these, on multiple sides if it touches the cycle network on multiple sides. Large developments should have multiple links to the cycle network.</li> <li>13. Large sections of infrastructure that include destinations should be made accessible by bicycle. Not doing so would make them an obstacle that cyclists would need to walk through or cycle around, which must be deemed unacceptable.</li> <li>14. The assumption should be made that every development will be visited by people who cycle. For example: Nursing homes might well have residents who cycle (perhaps as a mobility aid) and will certainly have visitors who cycle. Specialist shops will also still have visitors who cycle. Stereotypes of customers must not be a guide for the expected need for cycle facilities.</li> <li>15. Engagement with community groups by developers regarding cycle provisions should be encouraged.</li> <li>16. The engagement that a developer has had with community cycling groups should be weighted in determining whether their cycle facilities are sufficient and meet the needs of residents.</li> <li>17. Cycle way on council owned land should not be sold to become private land</li> <li>18. While climate related in this case, the health link should be made too: "Homes, workplaces, parks and green spaces, community facilities such as health care provision, shops and schools should be connected to each other by a range of routes</li> </ol>	Comments acknowledged and noted.
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that prioritise walking and cycling for people of all abilities and ages. This will make walking and cycling easy and attractive for all residents (see Principle 5), creating lively streets that support social interactions and footfall for local businesses."

(<https://www.england.nhs.uk/wp-content/uploads/2019/09/hip-2-design-deliver-manage.pdf>)

19. Pedestrians and cyclists should be prioritised at side road crossing points (see LTN 1/20 Figure 10.13)

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185	Climate Change	<p>Non-transport related comments:</p> <ol style="list-style-type: none"> <li>1. Traditional grass lawns are widely recognised to be ecological dead zones and should not be included in designs without proper justification.</li> <li>2. Hard standings should be justified and previously present hard standings that will no longer be used should be rewilded.</li> <li>3. Combined Heating and Power (CHPs) are praised in the climate change section and mentioned several times. This should be removed because they cannot be used to achieve net zero emissions. While more efficient than gas heating, they are less efficient than using a heat pump and using electricity from the grid.</li> <li>4. While the grid has the potential to achieve net zero, CHPs do not. They burn natural gas or biofuels. The first must be phased out for net-zero, the latter is controversial in nature and its supplies are uncertain. CHPs will realistically not run on green hydrogen within their lifetime as this is not readily available. While it is expected to play an important role in the energy transition, this role is expected to be at the grid level and would not be of concern to the local plan.</li> <li>5. The energy that CHPs inject power back into the grid might have a higher footprint than the grid has. This should not be simply encouraged.</li> <li>6. Heat pumps are a very important instrument for reducing the energy demand of buildings. They should be made a requirement and be given more attention.</li> </ol>		Comments acknowledged and noted.
188	Climate Change		<p>Climate Change: Policies CC1-8 (pp72-81)</p> <p>We are pleased to see revisions to the Local Plan which significantly strengthen its approach to climate change and the environment. We believe this is a proportionate response to the climate and ecological crisis facing the world. It is essential that these proposals are not diluted through the consultation process.</p> <p>We particularly welcome:</p> <ul style="list-style-type: none"> <li>• The placing of climate change at the forefront of the plan (5.1D).</li> <li>• The net zero requirements on major and large-scale major developments (CC1).</li> <li>• The emphasis on demand-side efficiency in new building (CC1).</li> <li>• The emphasis on avoiding the need for air conditioning (CC2).</li> <li>• The presumption in favour of rainwater and grey water harvesting (CC3).</li> <li>• The cap on daily per capita water consumption (CC3).</li> </ul>	Comments acknowledged and noted.

				<ul style="list-style-type: none"> <li>• The presumption in favour of green roofs.</li> <li>• The need to address issues of water quality (4.27).</li> <li>• The need to protect existing green spaces and include new ones on new developments (4.29).</li> </ul>	
189	Climate Change				Comments acknowledged and noted.
190	Climate Change			Under policy SP3: A strong, competitive economy there is no mention of exploiting opportunities in the green economy. We think this is disappointing, and perhaps the Plan is missing an opportunity given the emphasis the new Labour Government is placing on this sector.	Policy SP1 sets out the council's intention to promote a green economy.
191	Climate Change			We note that the Local Plan monitoring framework described in Section 15 has not been updated to include indicators for the new climate change policies. We think it is very important that this is remedied, especially since they are new, and there are potential trade-offs and conflicts with other policies. It is critical to ensure we deliver the strong climate change commitments made in the Plan (e.g. in 5.1D and 5.1H).	

195	Climate Change		<p>Part ((j)) of the policy sets out the Council's commitment to reduce the need to travel to help contribute towards mitigating and adapting to climate change. However, it is surprising that the policy has no specific commitment to encouraging active travel and the infrastructure required to support active travel in order to help contribute towards meeting climate change objectives. Encouraging active travel such as walking and cycling has a key role to play alongside reducing the need to travel in addressing climate change and the infrastructure in Stevenage has been designed to support active travel. It is therefore requested that an additional commitment is added to the policy which covers the Council's commitment to encouraging active travel and the infrastructure required to support active travel. As well as helping address climate change this will also support the delivery of Local Plan's health and wellbeing objectives.</p>		Comments acknowledged and noted.
198	Climate Change				Comments acknowledged and noted.

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200	Climate Change		<p>Policy SP1: Climate Change The policy ambition of SP1 seeks to ensure development proposals contribute to both mitigating and adapting to climate change and is supported. It is noted that the issues listed a. to l. provide a comprehensive list of considerations that will need to be addressed by applicants when submitting planning applications.</p> <p>New paragraphs 5.1A to 5.1H In the context that more than 2,500 people were killed by heatwaves across the UK in 2020 and nine out of the ten hottest years on record have occurred in the last decade, it is suggested that additional text is inserted that recognises climate change threatens the foundations of good health, with direct and immediate consequences to local communities, patients, and the NHS. Further, that climate change risks increase the prevalence of certain health conditions. The NHS estate accounts for 15% of the NHS's total carbon footprint. Further, the NHS accounts for around 40% of public sector emissions. As such the NHS as a public body has a critical role to play in delivering net zero from NHS operational activities and strategic decision making.</p> <p>In response to the UK government's call to become a low carbon economy, the NHS published the 'Delivering a Net Zero NHS' report (2020) that sets out the ambitions to achieve a net zero target by 2050. The two main goals of the report are: Net zero by 2040 for emissions that the NHS directly controls (the NHS footprint), with an 80% decrease by 2028 to 2032.</p> <p>For emissions, the NHS can influence (NHS Carbon Footprint plus) net zero by 2045, with an 80% decrease by 2036 to 2039.</p> <p>NHS commissioners and providers of NHS services are specifically addressing these net zero emissions targets, with the HWE ICB and provider trusts working together to progressively remove carbon emissions from all operational activities and strategic decision making, with a focus on direct intervention opportunities within estates and facilities, travel and transport and the supply chain. More recently the NHS Net Zero Building Standard, published on 22 February 2023, provides technical guidance to support the development of sustainable, resilient, and energy efficient buildings that meet the needs of patients now and in the future. This standard is relevant to new build and upgrades to existing healthcare buildings. This Standard was developed with healthcare, industry, and sustainability partners and will support the NHS meet building requirements, as well as meet its commitments to deliver a net zero health service by 2045.</p>		Add subtext - health & being
201	Climate Change				Comments acknowledged and noted.
202	Climate Change				Comments acknowledged and noted.

205	Climate Change		<p>As explained, Muse support the principle of this policy and share the Council's goal to deliver development with high sustainability standards. Muse has a fully developed, industry leading Sustainable Development Strategy would welcome the opportunity to work with the Council to refine the policy to ensure that it is aspirational and deliverable (see comments above).</p> <p>Currently the implications of criterion a and b in particular are unclear at this stage:</p> <p>a. apply emission reduction targets to developments according to their scale, supporting developments that achieve these targets by reducing overall energy demand, supplying energy efficiently, and generating ultra-low and zero carbon energy;</p> <p>b. ensure that any on-site shortfall against emission reduction targets is offset by an alternative off-site proposal or through the operation of the Council's Carbon Offset Fund;"</p> <p>We fully support reducing carbon emissions at all stages of the development process, but it is not clear what emission reduction targets could be and it is important that this is investigated further to ensure that requirements are feasible whilst not significantly undermining the deliverability of development in the town centre, in accordance with the NPPF. As the Council will be aware, construction cost inflation and other challenges such as high interest rates have made the delivery of development challenging and have contributed to challenges for Local Authorities, which partly explain why housing targets over recent years have been difficult to achieve.</p> <p>Such requirements also need to balance other policy requirements. It is noted that Policy HO7 (Affordable Housing) is largely unchanged from the current local plan in targeting 25% of new homes on previously developed sites to be affordable. In practice, this has been difficult on town centre sites given viability challenges with many recent permissions in and around the town committing to 10% affordable housing or lower. It is therefore important for any new policies requiring improved standards and/or further S106 requirements to be tested in the round to ensure that they do not have unintended consequences. Accordingly, we recommend that the Council commission viability evidence to underpin the justification for that revised and existing policies.</p>	<p>Careful consideration of the deliverability of development with new policies in place. This includes the Climate Change Policies (SP1 and the 'CC' policies in the new plan). The NPPF continues to require policies on development contributions not to undermine the deliverability of a local plan (current NPPF paragraph 34, new paragraph 35), and its important that development requirements, e.g. relating to high ambition carbon reduction goals (See comments) do not undermine the deliverability of the plan. Muse would welcome the opportunity to work with the Council to ensure that an appropriate balance is struck and explore whether the Council needs to consider the implications of these policies in viability terms in the updated evidence base to support the new policies in the plan.</p>	<p>Comments acknowledged and noted. The Local Plan Partial Review and Update has been viability tested. The results will be published ahead of Regulation 19.</p>
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207	Climate Change			<p>I object to the Climate Change update in its current form on the grounds that it is incomplete. While I welcome the Council's commitment to climate action, the proposed changes are lacking some well-established, high impact actions to mitigate and adapt to climate change, and includes areas around offsetting that are walking a fine line between greenwashing and effective action.</p> <p>The following points will need to be addressed for the Local Plan to take a more robust approach to effective climate action.</p> <ul style="list-style-type: none"> <li>• Include sustainable transport as a priority; either as a stand-alone or under infrastructure. There is currently no mention of sustainable transport being encouraged and prioritised across Stevenage. As transport emissions make up the highest sector emissions across the UK, and private car usage contributes the most to these emissions, Stevenage cannot realistically achieve net zero by 2030 without addressing transport emissions across the town. To effectively address transport emissions, we need to support a modal shift from private car usage to active travel (cycle, wheel, walk) and public transport. Active travel in particular should be made more attractive than travelling by car, and should provide inclusive and accessible routes for anyone age 8 to 80. Active travel, and cycling in particular, must be made more convenient than private car use when travelling through town which can be facilitated through connected cycling routes into new developments and the existing cycle networks and to introduce strategic cycle parking near entrances of destinations.</li> <li>• Combined heat and power (CHP) units should NOT be supported by this Council. The UK Climate Change Committee is clear that a priority</li> </ul>	Comments acknowledged and noted.
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action should be that 10% of all existing UK households should move to heat pumps by 2030, and that fossil fuel based boilers should be phased out. As there is no viable way to produce green hydrogen at the moment, CHPs should not be considered a clean energy source as they rely on greenhouse gases to be powered. The Climate Change Committee is clear that the Government, which local Councils should take note of too, should “remove biases towards the use of natural gas or hydrogen where electrification is the most economical route to decarbonisation.” Heat pumps are a very important instrument for reducing the energy demand of buildings. They should be made a requirement in the Local Plan and be given more attention. More information:

<https://www.theccc.org.uk/wp-content/uploads/2024/07/Progress-in-reducing-emissions-2024-Report-to-Parliament-Web.pdf>

- For new developments, the Council is rightly asking for a ‘whole life carbon net zero’ commitment. This is good, but it does not specify that the net zero targets that the development set should be SCIENCE-based. Only when we have a science-based net zero target can we actually make meaningful reduction. Only when there is a science-based climate target, are we then permitted to look at off-setting through a CREDIBLE off-setting scheme only for those emissions that we are unable to reduce further through our own actions. More information on this can be found at <https://sciencebasedtargets.org/net-zero> and

<https://unglobalcompact.org/take-action/action/science-based-target>

- There is no information available about Stevenage’s Council Carbon Off-set Fund. This should be included

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and answer some important questions: What guarantees will the Council give that this is not a greenwashing initiative and an easy way out for companies (and the Council) to off-set their remaining emissions rather than making a genuine, impactful change in the way they operate? In addition, what guarantees does the Council give that their offsetting schemes are actually effective, knowing that most schemes are not accredited and some may do more harm than good?

- The Council recognises the importance of local food production, but when it comes to reducing emissions from our food system, what we eat is more important than where the food comes from. While I encourage and support buying local to support the local economy, the Council should consider becoming a plant-based Council to promote sustainable food patterns. More information:  
<https://ourworldindata.org/food-choice-vs-eating-local> and  
<https://www.plantbasedcouncils.org/faq>
- The plan mentions standards for new housing developments but does not mention the existing housing stock. Households and landlords should be encouraged and supported to make improvements to their home to improve energy efficiency and the need for heating/cooling in similar ways to new developments. For landlords in particular, they should be encouraged to bring their houses up to EPC level C to protect renters from poorly insulated homes.
- The plan mentions a water efficiency target for new developments of no more than 110 liters per person per day which still sounds very high. From experience, I know that reducing this to below 100 liters per person per day is achievable with minor changes such as water reducing shower heads and

				<p>tabs, using a dishwasher, and being careful with the length of showers. These are actions that should be encouraged and supported by the Council. Again, this should be encouraged for all households - not only new developments.</p> <ul style="list-style-type: none"><li>• The document mentions that the UK has already warmed with 1 degrees Celsius. This is incorrect, according to Berkeley Earth, the UK has warmed 1.3 degrees since pre-industrial times. More information: <a href="https://berkeleyearth.org/policy-insights/">https://berkeleyearth.org/policy-insights/</a></li></ul>	
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212	Climate Change	SP1	<p><b>POLICY SP1: CLIMATE CHANGE</b></p> <p>While we welcome the proposed new Policy SP1, we believe it should be expanded to include sections that address energy efficiency and the retrofitting of existing (including historic) buildings. Approximately one quarter of the UK's building stock is at least 100 years old, and these buildings can and must adapt, not only to support the transition to a Net Zero society, but also to improve energy/cost-efficiency and thermal comfort for occupants, and to ensure they remain safe, desirable and viable assets for future generations to enjoy.</p> <p>Mitigating climate change and conserving historic buildings are compatible goals. Keeping historic buildings in use through sensitive repair, maintenance, and adaptation can help lower carbon emissions, reduce reliance on fossil fuels, and decrease energy costs. Additionally, the most sustainable building is one that already exists. The ongoing repair, maintenance, use, and re-use of historic structures prevent the unnecessary release of embodied carbon associated with the materials, transport, and processes involved in demolition and new construction.</p> <p>Further guidance can be found in our new Advice Note on adapting historic buildings for energy and carbon efficiency, published in July 2024. This document provides clarity and supports consistent decision-making for proposals aimed at reducing carbon emissions and improving the energy efficiency of historic buildings. It reflects current national planning policy and includes clear advice on insulation, boilers and heating systems, heat pumps, draft-proofing, replacing or adapting windows, and installing solar panels.</p> <p>You can access the Advice Note via the following link:  <a href="https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/heag321-adapting-historic-buildings-energy-carbon-efficiency/">https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/heag321-adapting-historic-buildings-energy-carbon-efficiency/</a></p> <p>Our recommendation  Expand Policy SP1 to include energy efficiency and retrofitting or include a new separate policy that addresses these issues.</p>		<p>The council cannot mandate retrofitting through the local plan and can only set policies for development. Where retrofitting does require planning permission, it will be supported by virtue of the proposed new climate change policies. Appropriate protection will also be afforded to heritage assets by the existing heritage policies, which largely reflect the policies set out in the NPPF.</p> <p>However, consideration will be given to updating the subtext of the policy to recognise the benefits of re-using existing buildings and emphasise that low and zero-carbon technologies are compatible with historic buildings.</p> <p><b>Actions:</b>  <b>1. Consider amending the subtext to Policy SP1 to recognise the benefits of re-using existing buildings and emphasise that low and zero-carbon technologies are compatible with historic buildings.</b></p>
213	Climate Change	CC6			Comments acknowledged and noted.
219	Climate Change	CC1			Comments acknowledged and noted.
220	Climate Change	CC1			Comments acknowledged and noted.
221	Climate Change	CC5			Comments acknowledged and noted.
222	Climate Change	CC6			Comments acknowledged and noted.
223	Climate Change	CC7			Comments acknowledged and noted.

225	Climate Change	SP1, SP11	<p>Policy SP1 Climate Change Its good to see mention of contributions towards mitigation and adaptation to climate change, as well as prevention of flooding and efficient use of water resources.</p> <p>Policy SP11 Flooding and Pollution Its good to see mention of the sequential approach and reference to National Flood Risk Planning Policies.</p> <p>We would propose the following lines are amended to: x 'Direct development to areas at the lowest risk of flooding through the application of a sequential approach, including climate change and the impact of climate change'</p>		Comments acknowledged and noted.
226	Climate Change	CC6			Comments acknowledged and noted.
229	Climate Change	CC3 - Residential Buildings			Comments acknowledged and noted.
230	Climate Change	CC3			Comments acknowledged and noted.
231	Climate Change	CC3			Comments acknowledged and noted.
232	Climate Change	CC3			Comments acknowledged and noted.

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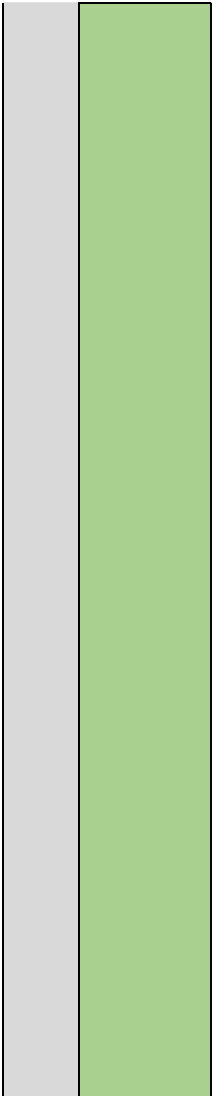
233	Climate Change
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There is no reference to transport so the following should be added.  
 The domestic transport sector remains the largest emitting sector in the UK, accounting for 29.1% of all greenhouse gas emissions in 2023. [uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf) ([publishing.service.gov.uk](https://publishing.service.gov.uk))  
 The Local Plan must include how a modal shift towards more sustainable travel choices is to be achieved. In all cases, the most up to date national guidance should be adhered to including the Active Travel England Standing Advice Note: [Active travel and sustainable development ate-travel-sustainable-development.pdf](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123457/active-travel-sustainable-development.pdf) ([publishing.service.gov.uk](https://publishing.service.gov.uk))  
 Cycling must be at least as convenient as driving for all short journeys. This includes provision of direct routes and convenient cycle parking. Multi-modal journeys involving cycling and use of public transport must be facilitated to make them an attractive alternative to private car use.  
 Cycle parking should be prioritised for all developments of residential properties, workplaces, retail outlets, leisure facilities, transport hubs and all other beginnings and destinations for cycle journeys. Cycle parking should be added whenever possible to existing properties and prioritised where refurbishment of any council property takes place. Long stay cycle parking – including at residential properties – should be secure, weatherproof, conveniently sited and easy to use by all users. It should be suitable for all types of cycle including cargo bikes and adapted cycles. Provision for electric bikes should include charging facilities. Users should not be expected to lift cycles or access through narrow gaps or paths. Stevenage has 45km of cycleways but there are significant gaps in the provision. For example, many access

Comments acknowledged and noted.

roads have been built across cycleways and there is a lack of traffic-free cycling infrastructure in and to newer residential and retail developments. Whenever possible, these gaps should be rectified. New developments must always have cycling links to the existing network built in line with national planning guidance eg LTN 1/20 and current best practice to ensure that they are suitable for cyclists of all ages and abilities from 8 to 80 and beyond. Cycle routes should be inclusive, and users of all types of cycle should be able to navigate them safely and easily. The use of barriers and bollards must be avoided to enable access by people using non-standard cycles such as tricycles, cargo bikes and adapted cycles. Cycles may be being used to transport children or heavy luggage eg shopping. Routes should be safe and pleasant to use at all times of day and throughout the year. They should be direct, well-lit and avoid steep gradients and steps. People cycling should never be expected to lift their cycle up a kerb or push their cycle to reach cycle parking at a destination - in some cases a cycle is used as a mobility aid by individuals who cannot walk far. Signage must be made clear to enable people cycling to find their way around the town. Road markings at new developments should reflect cyclist and pedestrian priority as in the Highway Code. Planting adjacent to cycleways should be chosen to minimise the need for pruning back, clearing leaves. Prickly plants and fast-growing plants should be avoided. Climate adaptation measures need to include good drainage for cycleways and provision for flood management and preventions especially in underpasses. Good provision for Active Travel will



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have additional benefits for the local economy and public health.





234	Climate Change	SP1, CC1 - CC8	<p style="text-align: center; font-size: 48px; opacity: 0.2; transform: rotate(-30deg);">DRAFT</p>	<p>All the above new and updated policies will have significant cost implications on development of new housing given that they go beyond the building regulations and / or the Future Homes Standards.</p> <p>Therefore, until such time as the council prepare, consult and engage on a plan wide viability assessment which demonstrates that these requirements are viable and deliverable, it would be inappropriate for the council to advance with these policies beyond the regulation 18 stage.</p> <p><b>Recommendation</b></p> <p>For the policy to be justified, effective and consistent with national policy the Council should update the plan wide viability assessment study to test the implications of the proposed policies on financial viability. If the policies are not viable or deliverable they must be amended.</p> <p>The viability work should include engagement with key stakeholders as a continuation of the regulation 18 consultation stage as it would not be justified to advance with these proposals without first ensuring a robust evidence base is established.</p> <p>As a more general point on sustainability standards, whilst the Council's commitment to meeting net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. It is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations.</p> <p>We would welcome the opportunity to engage on these matters further once the required viability evidence base has been produced for consultation with stakeholders.</p>	Comments acknowledged and noted.
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238	Climate Change	SP1	<p>Revised Local Plan 2024 and Justification</p> <p>Anglian Water (AWS) notes the contents of the Justifications table accompanying the consultation. In view of the proposed changes to Policy SP1, AWS supports the Partial Review given the ongoing water scarcity issue and related climate and environmental constraints. AWS considers that the new development supported by the Plan has the ability to be designed to reduce water use (supplied by Affinity Water). For example, rainwater harvesting, and grey water recycling have the potential to reduce the volume of wastewater requiring transport and treatment in the north part of the town. This could then more sustainably utilise the AWS sewer network and potentially limit or remove the need to utilise AWS Water Recycling Centre capacity. This would have carbon benefits through reduced operational emissions and could free up headroom to support growth thereby minimising or putting back the date when new capacity is required and so saving capital carbon.</p> <p>AWS strongly supports part c. of proposed Policy SP1 and endorses the other parts of the draft policy as these align with our company Purpose and Strategic Direction Statement. AWS strongly supports new paragraphs 5.1A to 5.1H and specifically that the updated Local Plan 'promotes the sustainable use of water resources'.</p>		Comments noted and acknowledged.
239	Climate Change	SP8, CC3	<p>AWS notes the clarification on Policy SP8 (e) regarding Building Regulations and water efficiency. Whilst noting that we are not the water supplier for the Borough we would advocate that the Local Plan is more aspirational in its water efficiency position in line with draft Policy SP1. AWS's new joint Water Efficiency Protocol produced with the Environment Agency and Natural England looks to support a 100litres PCC position. We therefore suggest that New Policy CC3 is redrafted to apply the 100litres PCC approach. We suggest that the table after 15.10 is updated to include the 100 PCC target. The final draft of the Protocol and the supporting evidence will be provided the Council when this agreed later this year with partners.</p> <p>On new paragraphs 6A.21 to 6A.27. AWS is finalising evidence on the cost of moving to a 100PCC as part of the new joint Protocol policy so that this can support Councils in making the case that water efficiency does not materially impact viability. We note the intention of Government to consult on Building Regulations and the previous Government's move to 100PCC in the Environmental Improvement Plan and the removal of the 2012 Ministerial Statement as policy.</p>		Comments acknowledged and noted.
242	Climate Change	SP1	<p>Policy SP1 – Climate change.</p> <p>We are pleased to see reference to rainwater harvesting and urban greening. The provision of SuDS is well placed to support these policies. This is supplemented in paragraphs 5.1G and 5.1H. We acknowledge flooding is covered by a separate policy.</p>		Comments noted and acknowledged.

243	Climate Change	SP11	<p>Policy SP11 – Flooding and pollution</p> <p>Part A - We welcome and encourage the application of the sequential approach, which is that development should be steered away from areas at risk from all sources. We are pleased the application of the sequential and exception tests are referred to in Policy FP2.</p> <p>In order to ensure the policy is achieved, we recommend that the Local Planning Authority ensure their Strategic Flood Risk Assessment (SFRA) is updated regularly, as they are intended to be “living documents”.</p> <p>Part C – Could this include reference to source control – the principle of managing runoff as close to where it is generated as possible? Well considered source control designs allow for the multiple benefits of SuDS to be better appreciated through distributing the benefits throughout a site. It also distributes the risk around the site if something were to go wrong (lack of maintenance, unexpected faults etc) instead of relying on large basins or attenuation tanks at the end of the network, which concentrates the risk. Provision of source control features throughout a site will allow for more attenuation to be provided upslope, reducing the necessary size of the final attenuation features (such as basins), which may allow for provision of more space for public open space, landscaping, development, etc.</p> <p>Source control SuDS such as small basins, SuDS planters, rain gardens and tree pits etc. also contribute to other aims of the LP (CC2 – Heating and Cooling) – such as reducing overheating. Open SuDS can help to manage the urban heat island effect.</p> <p>Part D – Multiple benefits should include ecology, landscaping and general amenity/placemaking.</p>		Comments acknowledged and noted.
244	Climate Change	CC3			Comments noted and acknowledged.
245	Climate Change	CC6			Comments acknowledged and noted.

247	Climate Change	SP1, CC1		<p>The Sustainable Hertfordshire unit is very pleased to see the suggested revisions and supports the Borough Council in its approach to incorporating specific policies relating to climate change into the Local Plan. The following may be useful to provide additional support and add to the evidence base for such updates: From the TCPA: New resources page on net zero buildings policies for local plans</p> <hr/> <p>Following the recent judgement on the legal challenge to the 13 December WMS, the TCPA have updated our statement on this policy topic. We have also created a new webpage which brings together resources and information on this issue. We hope this is a useful resource for local authorities and we will endeavour to keep this up to date. If you have resources or information that would be useful to add to this page, please contact us.</p> <ul style="list-style-type: none"> <li>• Our updated statement can be accessed here.</li> <li>• The resources page is available here.</li> <li>• RCA have published an update on the high court case here.</li> </ul> <p>Resources from Essex CC may also be of interest: Essex Net Zero Evidence   Essex Design Guide Essex Net Zero Policy   Essex Design Guide</p>	Comments noted and acknowledged.
254	Climate Change	SP1	<p>The County Council welcomes the commitment within criterion L of Policy SP1, which states that the Borough Council will ensure that site waste is disposed of as sustainably as possible. However, the County Council would recommend that the criterion is expanded further and amended to include wording around the maximisation of on-site reuse and recycling of waste. In addition, the criterion could add specifically that where waste cannot be avoided, that waste should be managed as sustainably as possible, avoiding disposal at landfill wherever possible.</p>		Comments noted and acknowledged.
255	Climate Change	CC8			comment noted

259	Climate Change	SP1	<p><b>New Policy SP1 – Climate Change</b></p> <p>The wording of the new Policy is intended to align with the SBC Climate Change Strategy and support detailed climate change policies under chapter 6A. We agree with the update of Policy SP1 – Sustainable Development and its replacement with the new Climate Change Policy. We support the introduction of emission reduction targets seeking the reduction of overall energy demand and promoting ultra-low and zero carbon energy. North Herts Council is in the process of adopting a Sustainability Supplementary Planning Document which encourages developers to achieve higher standards of sustainability including on carbon reduction, low carbon energy, whole life carbon and water conservation. There are potential crossboundary collaborations in achieving these targets, particularly where there are adjacent strategic development sites where economies of scale facilitate decentralised energy networks/district heat networks. We would like to see this Policy seek to identify cross-boundary opportunities to work with North Herts and East Herts to exploit such opportunities in the future. We support the addition of new paragraphs 5.1A to 5.1H to support new Policy SP1.</p>		Comments acknowledged and noted.
261	Climate Change	SP11	<p><b>New Policy SP11 – Flooding and pollution</b></p> <p>This Policy should be worded more strongly, particularly in respect of criterion a); the area of lowest risk of flooding within a development site may still not be appropriate to develop having regard to the development vulnerability categories. In the first instance, the sequential test should be passed, and only then should the sequential approach be applied to the development site. Stevenage has areas of less significant fluvial flood risk compared to surface water flood risk. It is unlikely that Stevenage will be able to achieve the provision of new Flood Storage Reservoirs within its boundary due to the high-density development that is ongoing and site constraints. Policy SP11 should be reworded in order to reflect these priorities. Supporting text for Policy SP11 should include reference to the multiple functions of SuDS. In addition, Schedule 3 of the of the Flood and Water Management Act 2010 is expected to come into force in 2024 and is likely to impact this policy (e.g. SuDS must be approved by the SuDS Approving Body or SAB). The Strategic Flood Risk Assessment (SFRA) for the Borough should be updated to evidence the areas within Stevenage that suffer from increased risk of both fluvial and surface water flood risk. Given the recent extremes of weather that the region has experienced over the time even since the last SFRA was updated, it would be useful to have this evidence updated for future development within Stevenage. In addition, the supporting text for Policy SP11 refers to the 2012 NPPF, these references should be updated to the most recent version (or forthcoming version) to ensure that the Policy is up to date. References to pollution that is not water related should be removed and be dealt with elsewhere in the Plan rather than combine the two elements. Alternatively, deal with pollution, in all its forms, as a separate issue aside from flooding.</p>		<p>Criterion (a) of SP11 applies to both the site selection stage and site layout stage.</p> <p>The council is mindful of the need to undertake a more comprehensive review of its flood risk and pollution policies and update its SFRA. This will be considered as part of the full review of the plan, which commences next year.</p> <p>The council is also mindful of changes to the SuDS approval process and references to past versions of the NPPF. The council is content that these do not necessitate any changes to policy or subtext.</p>
262	Climate Change			New Chapter - Climate Change We support the addition of a new Climate Change chapter in the Local Plan.	Comments noted. No change.

263	Climate Change	CC1										Comments acknowledged and noted.
264	Climate Change	CC2										In practice, the fact that householder developments will have to comply with the policy will mean that householder applications which involve energy-dependent cooling systems are likely to be refused. No further monitoring will be required.
265	Climate Change	CC3										The ability of local authorities to set water usage targets beyond the Building Regulations optional standard is questionable. In any event, the council has no evidence to support a more stringent standard. No change.
266	Climate Change	CC4										Comments noted. No change.
267	Climate Change	CC5										Comments noted. No change.
268	Climate Change	CC6										The difficulties in installing and maintaining green walls are well documented. In any case, the title of the policy is of little consequence. No change. Comments acknowledged and noted.  Comments acknowledged and noted.
269	Climate Change	CC7										
270	Climate Change	CC8										

SBC_Comment_ID	Theme of Comment	Local Plan Policy No.	Key words from text	Let us now know your thoughts on Policy CC1? - Climate Change	Let us know your thoughts on Policy CC2? - Climate Change	Let us know your thoughts on Policy CC3? - Climate Change	Let us know your thoughts on Policy CC4? - Climate Change	Let us know your thoughts on Policy CC5? - Climate Change	Let us know your thoughts on Policy CC6? - Climate Change	Let us know your thoughts on Policy CC7? - Climate Change	Let us know your thoughts on CC8? - Climate Change	SBC_Response
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4	Climate Change	CC1	Emissions	-	-	-	-	-	-	-	-	<p>Noted.</p> <p>Actions:</p> <ol style="list-style-type: none"> <li>1. Consider new/amended policies to make clear that sustainable transport should be prioritised.</li> <li>2. Consider new/amended policies for the protection of existing cycleways and provision of new cycleways in development proposals.</li> </ol>
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11	Climate Change	SP1, CC1, CC2, CC3, CC4, CC7		<p>Query the assumptions here ie the conventional Fabric First energy hierarchy. Electrification First is now a smarter route to zero carbon, since further demand reduction via insulation now suffers diminishing returns; and anyway one cannot insulate/reduce demand all the way to net zero, esp not for hot water. Moreover, onsite renewable power (PV), which has a quite high cost per kW, now displaces less and less emissions.</p> <p>The government's proposed spec for Part L (the Future Homes Standard) recognises this, by mandating an end to gas, and only requiring a few value-for-</p>	<p>This policy is based on a rather too simple hierarchy. There are so many counter examples:</p> <ol style="list-style-type: none"> <li>1. Passive ventilation is not necessarily, or indeed not at all, preferable to mechanical; for example the core of the ultra-green Passive House philosophy is mechanical heat recovery combined with extreme airtightness. MVHR can then be used for active cooling too.</li> <li>2. Passive measures lack control and can be draughty (trickle vents, passive stacks)</li> <li>3. Mechanical ventilation is often essential to combat mould and condensation. New Approved Documents L and F will fully accept mechanical ventilation,</li> </ol>	<p>OK with water targets.</p> <p>Query the definition of water neutrality, "not increasing demand for water abstraction above existing levels"™ (support text, not glossary), as this seems to imply, for a green field site with zero existing abstraction, absolutely no mains water use. Roof harvesting and grey water recycling are fine for saving potable water, but not without downsides (respectively, reduced groundwater recharge, and increased concentration of pollutants), and potable water reduction has limits: 100% reduction would imply</p>	<p>Disagree strongly: ultra-low and zero carbon CHP is surely a contradiction in terms, as CHP relies on burning fossil fuels; by contrast renewable power generation (wind, sun) has no waste heat. Encouraging CHP is a backward step</p>	-	-	<p>Query need for a policy, as ultrafast broadband is now available virtually everywhere in Stevenage for new build, and developers need no compulsion to install fibreoptic cable. The issue is surely with existing homes.</p>	-	<p>Comments acknowledged and noted.</p>
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			<p>money upgrades for heat loss (eg closing the performance gap, better airtightness)</p> <p>By the time the Partial Review is approved, this revised Part L of the Building Regulations will apply to all new homes. It assumes very low Target Emission Rates that can only be achieved by an all-electric homes with a heat pump. The new figure for Part L 2025 is only 86 g CO2 per kWh, which is based on the forecast carbon content of grid electricity in the 5 year period ending 2029.</p> <p>At some time after 2029, the electricity grid will approach, and then achieve, zero carbon: the last government's Future Energy</p>	<p>proposing ways to make it more efficient (duct design, power consumption, better commissioning).</p> <p>4. Mechanical ventilation can "unlock" high density flats in sustainable locations near busy roads, by giving residents satisfactory internal noise levels.</p> <p>5. Aircon if powered by onsite PV (eg the carpark shades you see outside Californian offices) is actually quite green.</p> <p>Moreover, this policy does not seem to be aware of Part O, Overheating, introduced in 2021 which is currently under review and likely to be strengthened.</p> <p>Proposals</p>	<p>that people should drink, cook or wash in rainwater, and that each home has its own water and sewage works.</p> <p>There are other practical issues (space for plant, ongoing and decentralised hygiene maintenance). Green roofs can also frustrate roof water harvesting.</p>					
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				<p>Strategy had a target of 2035, and the current government has an ambition to do it by 2030. Whatever the exact date of the decommissioning of the last fossil fuel power station, new homes built under the 2025 Part L will generate zero CO2 on site, immediately, Off site, the residual CO2 emissions associated with power stations would be quite small for Future Homes, and would reduce very soon by 35 % naturally - albeit this is beyond the influence of home owners or landlords. The extra cost to bring forward 35% of this natural reduction is a heavy price. Future new homes are not the problem; itâ€™s the stock.</p>	<p>â€¢ Query need for a planning policy that duplicated B Regs. Suggest hierarchy is deleted, and that policy focuses on the site layout and orientation stage</p> <p>â€¢ Query need for a cooling statement for minor development, eg for a single house.</p>						
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				Compliance with Part L 2025 should be sufficient.									
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12	Climate Change	SP1		-	-	-	-	-	-	-	-	<p>This is worthy of consideration. Reducing transport-related carbon emissions by facilitating a modal shift away from private cars to more sustainable modes of transport, especially walking and cycling, is a key objective of the plan. The view of officers thus far is that this is adequately expressed in Policy SP6. However, it could perhaps be strengthened and also set out under Policy SP1 to reflect the significant link between transport and climate change.</p> <p>Actions:</p> <ol style="list-style-type: none"> <li>1. Consider strengthening Policy SP6.</li> <li>2. Consider amending Policy SP1 to reflect the strategic aim</li> </ol>
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													of facilitating a shift to sustainable modes of transport.
21	Climate Change		Transport, Wildlife	-	-	-	-	-	-	-	-	-	Comments acknowledged and noted.
26	Climate Change	SP1, CC1, CC2, CC3, CC4, CC5, CC6, CC7, CC8		We should be challenging schemes stronger to demonstrate why they cannot fully reduce carbon emissions. The carbon offsetting could be seen as a get out for developers.	Could energy dependent cooling systems utilise green energy? The proposals included will avoid the need, but over time cooling systems could avoid any carbon emissions by using green energy.	May need to demonstrate what sort of reasons would be clear and convincing for not including water harvesting.	This may be covered elsewhere, but need to ensure there is reference to providing energy infrastructure for green EVs as part of all new schemes - this should be the default.	Important to be stronger on retaining these or replacing any that are impacted.	Support of solar roofs should be stronger - it should be the default for any scheme to include solar.	Should go beyond just ducting space and include the fibre required for full fibre broadband. Could even include a requirement to work with the telco to ensure end to end fibre connectivity for new developments.	Important to be stronger on retaining these or replacing any that are impacted.		
27	Climate Change	SP1		-	-	-	-	-	-	-	-	-	The council cannot revisit development that has already been implemented through the local plan, nor can it tackle issues other than development

												(e.g. the powers afforded to parking wardens). However, the plan does propose policies to require appropriate SuDS, green roofs and low/zero-carbon technologies.
104	Climate Change	SP1, CC1, CC2, CC3, CC5, CC7		This looks to be good.	This reads well but how will you decide that a project has no alternative to powered cooling?	This is good. How will you help existing buildings to reduce their water usage?	-	Should not? Surely this should be must not unless an exceptional case can be made and suitable replacement is installed.	-	Agree	-	Comments acknowledged and noted.

107	Climate Change	SP1		-	-	-	-	-	<p>We welcome supporting text which requires proposals to consider the affects on nearby heritage assets. This is consistent with the National Planning Policy Framework (NPPF), specifically paragraph 201, which states that local planning authorities should require applicants to describe the significance of any affected heritage assets, including those impacted by changes to their setting. The inclusion of this text should ensure that heritage issues are not overlooked during the planning process, and promote a holistic approach to development, where environmental sustainability (in the form of green roofs) is balanced with the conservation and enhancement of the historic environment.</p> <p>Our recommendation:</p> <p>None.</p>	-	-	
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170	Climate Change			-	-	-	-	-	There are issues around Green Walls, these now tend not to be recommended because unless they are constantly maintained the plants die and the wall becomes a fire risk.	-	-	Comments acknowledged and noted. Consideration has been given. Policy SP8 updated to include reference to reducing crime and the fear of crime in new developments.
175	Climate Change	SP1		-	-	-	-	-		-	-	Comments acknowledged and noted.
177	Climate Change											Comments acknowledged and noted.
180	Climate Change								Thames Water support the inclusion of Policy CC3 on water efficiency. The inclusion of water efficiency measures also provides benefits for sewerage infrastructure by reducing the volume of foul flows from new development.  In relation to sewerage infrastructure , new development may result in requirements			Comments acknowledged and noted.



						to upgrades the existing sewerage network to provide capacity to support growth. Thames Water cannot prevent connection of development on grounds of lack of capacity and as such planning conditions may be necessary to phase development to ensure that the relevant phase of development is not occupied until any necessary infrastructure upgrades have been completed. In this context we support the retention of text in Policy SP5 and paragraph 5.53.						
183	Climate Change											Comments acknowledged and noted.
184	Climate Change											Comments acknowledged and noted.

185	Climate Change											Comments acknowledged and noted.
188	Climate Change											Comments acknowledged and noted.
189	Climate Change			Regarding policy CC1 and energy efficiency; where carbon offsets are paid into the Council's Carbon Offset Fund the carbon pricing needs to be set at a level that gives developers a real incentive to meet the high standards the Plan sets, and makes a realistic assessment of the true cost of carbon. It would be very concerning to see the Carbon Offset Fund become a facility commonly used by developers. We see that there will be a separate document on pricing (6A.8) and we look forward to seeing this.								Comments acknowledged and noted.

190	Climate Change												Policy SP1 sets out the council's intention to promote a green economy.
191	Climate Change												
195	Climate Change												Comments acknowledged and noted.
198	Climate Change			Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as									Comments acknowledged and noted.

				<p>early as possible. One of the key strategic areas of the consultation is the local plan's response to Climate Change. The new and adapted policies seek to better mitigate as well as adapt Stevenage from the effects of climate change. NHSPS fully support policies that promote carbon neutral development, particularly policies SP1 and CC1 which introduces the securing of financial contributions where on-site carbon mitigation requirements cannot be met. In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from carbon</p>								
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				offset funds. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.								
200	Climate Change											Add subtext - health & being
201	Climate Change			Stevenage Net Zero emissions target The suggested new text says, 'Locally-driven action will be crucial to meeting this [Paris Agreement] target. Accordingly, the council has committed to ensuring that Stevenage has net-zero emissions by 2030 and has developed a climate change strategy and action plan'. This locally set net zero emissions target is at odds with the UK's								Comments acknowledged and noted.

				<p>commitment, under the Paris Agreement where a target has been set to reduce emissions by 45% by 2030, and to reach net zero by 2050. Also, this locally set target does not align with the NHS' own targets, as explained above.</p> <p>With regards to new policy CC1: Energy efficiency, where major development proposals must achieve net zero regulated operational emissions, the NHS is working to a later timeline that are consistent with national targets to ensure that NHS delivers a net zero health service by 2045. As such the HWE ICB and system partners do not support Stevenage's locally set and earlier target,</p>								
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				<p>nor can fully support new policy CC1.</p> <p>With regards to policy CC1: Energy efficiency, please note earlier comments. In addition, it is suggested that the accompanying text should be inserted to make it more explicit what evidence an applicant is required to submit to demonstrate how proposals comply with Policy CC1 and clearer on the level of detail required to meet the requirement that the detail required 'will be proportionate to the scale and complexity of the proposal'.</p>								
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202	Climate Change				<p>With regards to policy CC2: Heating and Cooling, it is noted the policy recognises that in some instances, the use of active cooling systems may be unavoidable, with the accompanying text saying. 'this may include healthcare and laboratory settings, where precise temperature control is essential to the use. In these circumstances , the cooling systems should ideally be designed to reuse the waste heat that they produce'. This acknowledgment that the use of active cooling systems may be unavoidable in a healthcare setting is welcomed.</p>							Comments acknowledged and noted.
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205	Climate Change										Comments acknowledged and noted. The Local Plan Partial Review and Update has been viability tested. The results will be published ahead of Regulation 19.
207	Climate Change										Comments acknowledged and noted.
212	Climate Change	SP1									The council cannot mandate retrofitting through the local plan and can only set policies for development. Where retrofitting does require planning permission, it will be supported by virtue of the proposed new climate change policies. Appropriate protection will also be afforded to heritage assets by the existing heritage policies, which largely reflect the



213	Climate Change	CC6							<p>POLICY CC6: GREEN ROOFS SUPPORTING TEXT PARAGRAPHS 6A.35 TO 6A.42 We welcome supporting text which requires proposals to consider the affects on nearby heritage assets. This is consistent with the National Planning Policy Framework (NPPF), specifically paragraph 201, which states that local planning authorities should require applicants to describe the significance of any affected heritage assets, including those impacted by changes to their setting. The inclusion of this text should ensure that heritage issues are not overlooked during the planning process, and promote a holistic approach to development, where environmental sustainability (in the form of green roofs) is balanced with the conservation and enhancement of the historic</p>			<p>Comments acknowledge d and noted.</p>
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									environment. Our recommendation None.			
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219	Climate Change	CC1	Carbon Emissions	<p>Reducing carbon emissions</p> <p>The proposed policy requires minor development to deliver a 35% improvement upon relevant emission rates required by part L of the Building Regulations and for major development to achieve net zero required operational emissions.</p> <p>With regard to the first part the Council will need to be clear as to whether the requirements the 2021 version of part L or whether the council intend it to be an uplift on future version of Part L.</p> <p>Clearly the impact on small sites of delivering a 35% improvement on the Future Homes Standard would be significant and would need to be properly</p>								Comments acknowledged and noted.
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			<p>tested. The Council must prove clarity on this.</p> <p>With regard to second standard for major development, the Council will be aware the Written Ministerial Statement from December 2023 sets out current expectations with regard setting energy efficiency standards in local plans. Before considering the content of the WMS itself it is important to note the High Court judgement from the 2nd of July 2024 ([2024]EWHC 1693 Admin). This judgement was on the challenge to the WMS made by Rights Community Action on three grounds, including that the WMS restricted</p>								
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			<p>exercise by local authorities of powers conferred on them.</p> <p>Moving to the WMS, it is notes that it is not expecting plan makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations and states that “Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes”. In addition, the WMS notes that local standards can “add further costs to building new homes by adding complexity and undermining</p>								
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			<p>economies of scale". Therefore, the starting point is that differential standards to those set out in building regulation are discouraged due to the potential negative impact on the delivery of new homes. The HBF would agree with this and suggest that the most effective approach to delivering zero carbon homes in line with national commitments to achieving net zero and meeting housing needs in full is through the building regulations and the Future Homes Standard.</p> <p>However, after noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond current or planned</p>								
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				<p>building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures: That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).</p>								
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220	Climate Change	CC1	Carbon Emissions	<p>The approach taken by the Council is broadly consistent with the second bullet in the WMS in that it expresses the standard in relation to carbon emissions. However, it is noted that the footnote in the policy refers to Dwelling Emissions Rate (DER) or Building Emissions Rate (BER) rather than the Target Emissions Rate and this should be amended for the sake of consistency and clarity.</p> <p>With regard to the first bullet point in the WMS given the Council has not provided any evidence as part of this consultation it is impossible to say whether the policy will impact on the viability, affordability or deliverability of</p>								Comments acknowledged and noted.
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			<p>development in Stevenage. In examining the potential impact, we would advise the council to examine work undertaken by the Future Homes Hub who are working with the Government and the full range of stakeholders on delivering low and zero carbon homes and have produced documents such as "Ready for Zero" which provides some indication as to the cost of delivering zero carbon homes.</p> <p>However, the Council will need to look not just at viability but also at deliverability and affordability. HBF are concerned as to the impact standards that go beyond future current and future</p>								
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				<p>building regulations will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed are higher than those proposed by Government in the Future Homes Standard and will require higher levels of fabric efficiency, which in turn will require new skills and materials that may not be readily available, HBF are concerned this could slow delivery in the short to medium term as supply chains are developed. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements to enable a steady build-up of skills and ensure quality. The FHH also</p>								
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			<p>notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would "... create a high risk of quality problems, inflated costs and, potentially, stalled build programmes."</p> <p>In order to monitor the delivery of the policy the council are proposing to place planning conditions or legal agreements on development to ensure that the net zero target is met in practice and that building fabric has been optimised. With regard to optimising fabric efficiency, the council should not be dictating how the net zero</p>								
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				<p>target is achieved. It appears from the supporting text that the council would require specific energy use targets to be established and achieved. However, such an approach would be inconsistent with the WMS which requires policies to use TER. If this is the case HBF would recommend that this requirement is deleted. The development industry must have the flexibility to achieve policies around net zero which can be achieved in variety of ways, and this should be recognised in local plans</p>								
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221	Climate Change	CC5	Carbon sinks and BNG				<p>Policy CC5: Carbon Sinks 16.</p> <p>The Council will need to clear as to how this policy operate alongside the legal requirements for development to deliver a 10% net gain in biodiversity. This requirement already requires development to minimise losses of habitats on site prior to ensuring any losses that do happen are mitigated elsewhere on site or where this is not possible offsite. It is important for the Council to recognise that the improvement in BNG is in effect the replacement and delivery of new habitats</p>			Comments acknowledged and noted.
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								which will in turn deliver net gains in carbon sequestration as is being required by policy CC5. Given this similarity the policy would appear to be unnecessary and should be deleted.				
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222	Climate Change	CC6	green roofs and building regs						<p>Policy CC6 Green Roofs 17. HBF object strongly to this policy which will require green roofs across all development unless there are strong reason for not providing them. HBF are concerned that this will place significant additional costs on the delivery of new homes but also allow down the delivery of new homes as the industry is not geared up to delivering green roofs at the scale being suggested by the council. HBF are also cautious as to the public acceptance of green roofs on all new homes. While the council state that they are willing to see a degree of divergence from the established character of the area our experience is that many communities are less willing to see such divergence. If the council are to include this policy in the local</p>		<p>Comments acknowledged and noted.</p>
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									plan it will need to provide evidence not only with regard to viability but also that there are the skills and resources to effectively deliver green roofs on the majority of buildings in Stevenage.			
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223	Climate Change	CC7	digital connectivity and buildings regs							<p>This policy requires new development to ensure sufficient ducting space for full fibre connectivity. The Council are no doubt aware that Part R of the Building Regulations: Physical Infrastructure and network connections to new dwellings (2022 edition) require all new build dwellings to be installed with the gigabit-ready physical infrastructure connections subject to a cost cap of £2,000 per dwelling. These requirements mean that it is unnecessary for the Council to include policies in the local plan relating to new broadband or telecommunications infrastructure. HBF therefore recommend the policy is not included in the local plan.</p>		Comments acknowledged and noted.
225	Climate Change	SP1, SP11	mitigation and adaption									Comments acknowledged and noted.

226	Climate Change	CC6	Green roofs						Policy CC6 Green Roofs We appreciate that the policy now acknowledges the impact of green roofs to reduce surface water runoff.			Comments acknowledged and noted.
229	Climate Change	CC3 - Residential Buildings	Water efficiency in residential buildings			Policy CC3 Water Efficiency Residential buildings We appreciate the water efficiency targets detailed within policy CC3 including the requirement to keep personal potable water consumption to under 110 litres per person, per day. We would further encourage you to seek even higher levels of water efficiency. We note that Uttlesford District Council aims for water neutrality in their section 9.107 (page						Comments acknowledged and noted.

					<p>137) of their Draft Local Plan. Such commitments are highly valued in an area where there is serious water stress. We would support you to make proactive and forward-minded water efficiency policies. Paragraph 158 of the National Planning Policy Framework states that: 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures</p> <p>.1</p>						
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						<p>There are significant water resources challenges facing Stevenage Borough. Multiple organisations have roles and responsibilities to respond to these challenges. The Stevenage Borough Council has responsibilities to conserve water detailed in Section 83 of the Water Act 2003.2 These can be satisfied by supporting the efficient use of water and maintaining the profile of this key issue through its powers in the regulatory planning framework.</p>						
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230	Climate Change	CC3	Water efficiency in commercial buildings		<p>Commercial buildings In addition to setting water efficiency targets for residential developments, you should be setting targets for commercial developments. While we appreciate mention and encouragement of BREEAM standards, we are disappointed that section 10.5E (page 157) only incentivised BREEAM compliance rather than insisting upon it.</p> <p>We strongly recommend that you include a policy insisting that commercial and/or major developments achieve a BREEAM rating of 'excellent' (or equivalent). However, this can be achieved without necessarily</p>						Comments acknowledged and noted.
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						delivering high water efficiency (an 'excellent' rating is given to an overall building sustainability score of 70-84%). We would therefore recommend that any such development be required to achieve a BREEAM 'excellent' rating specifically in the water efficiency category (WAT 01). This would bring this policy in line with other neighbouring local authority local plans, like the Welwyn Hatfield Borough Council Local Plan 2016-2036 (Section 11.31 and 11.32, page 93) By mandating that both residential and non-residential					
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						development s meet these water efficiency targets, Stevenage Borough Council will ensure that the Stevenage Borough Local Plan 2011-2031 keeps all new development s focused on improving the resilience of the water resource situation in Stevenage.						
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231	Climate Change	CC3	Water efficiency in all new construction		<p>Improving water efficiency</p> <p>We are very supportive of the specific mention of rain and greywater recycling in the policy (Policy 6A.24) along with the specific mention of not accepting financial costs as a reason to not install such infrastructure . We are however disappointed that the required installation of grey water recycling is limited to only non-residential structures. Instead, we suggest that the requirement be applied to all new constructions , since we do not find such a goal untenable. These interventions will have the potential to significantly</p>						Comments acknowledged and noted.
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					<p>increase water efficiency.</p> <ul style="list-style-type: none"><li>• High water efficiency targets can be achieved by pursuing a 'fittings-based' approach. This involves the installation of water efficient fittings, such as aerating showerheads , spray taps and low flush toilets.</li><li>• More complex interventions, such as the installation of greywater recycling systems and/or rainwater harvesting, allow for further efficiency gains. Rainwater harvesting systems have been calculated as being able to provide 18-87% of a building's non-potable water</li></ul>					
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					<p>demand (as well as decreasing the volume of surface run-off by 75%).<sup>3</sup> A 2010 study by the Environment Agency demonstrated that greywater recycling in a two-storey house can offset mains water by up to 76m<sup>3</sup> water per year, and up to 1270m<sup>3</sup> water per year in a 10,000m<sup>2</sup> office block.<sup>4</sup> Such interventions can therefore deliver significant water efficiency gains in urban environments</p> <ul style="list-style-type: none"><li>- Pursuing efficient and responsible use of water resources can deliver additional environmental and sustainability benefits. For example,</li></ul>					
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						<p>efficient water use can contribute to reductions in greenhouse gas emissions. In 2008, the Environment Agency conducted a study regarding the greenhouse gas implications of a number of water resource options. Relevant outcomes of the study were:</p> <ul style="list-style-type: none"><li>• 89% of emissions in the water system can be attributed to 'water in the home'. This includes energy for heating water, but excludes space/central heating.</li><li>• The remaining 11% of emissions originate from abstracting, treating and supplying</li></ul>					
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water, and the subsequent waste water treatment.

- Demand management measures, particularly those that reduce hot water use, have significant potential to save water and energy, and reduce the carbon footprint throughout the water system. This could result in a reduction of greenhouse gas emissions, and household utility bills.<sup>5</sup>

232	Climate Change	CC3	Retrofitting		<p>Retrofitting of existing building stock          We are disappointed to find no specific reference to retrofitting current structures to improve water efficiency beyond a mention of how BREEAM standards request it. We would highly encourage you to include specific reference to the requirement of retrofitting for water efficiency. Current regional levels of high water use are driven in part by inefficient water use in existing building stock. If existing water usage is to be reduced, then improving the efficiency of points-of-use in current buildings is just as</p>						Comments acknowledged and noted.
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						important as those in new developments. We therefore encourage Stevenage Borough Council to include policy lines that obligate any refurbishments and/or changes of use of existing building stock to include retrofitting to improve water efficiency. There are BREEAM Technical Standards documents to support the retrofitting of commercial and residential buildings.						
233	Climate Change		Climate Change and Transport									Comments acknowledged and noted.
234	Climate Change	SP1, CC1 - CC8	Climate Change and Viability (see response in full)									Comments acknowledged and noted.
238	Climate Change	SP1	Water scarcity, water									Comments noted and acknowledged.



			sustainability									
239	Climate Change	SP8, CC3				<p>AWS supports new paragraphs 10.5A to 10.5F and the application of BREEAM standards. Our updated joint Protocol supports the approach that a BREEAM assessment of a commercial building should deliver on all the assessed aspects of the Water category. Noting that BREEAM won't be mandatory in the Borough, AWS suggests a three stage progressive level of support in these paragraphs ranging from neutral for applications which explain why BREEAM hasn't been used, to support for BREEAM 'Excellent' and</p>						Comments acknowledged and noted.

						'Outstanding' and which assess all water criteria to strong support for developments which maximise water efficiency. Reduced water use can also reduce wastewater demands and so assist in sustainably managing sewer capacity and treatment.						
242	Climate Change	SP1	SuDS									Comments noted and acknowledged.
243	Climate Change	SP11	Source control SuDS									Comments acknowledged and noted.
244	Climate Change	CC3	Water efficiency			CC3 – Water efficiency The LLFA welcomes and encourages the proposals around rainwater harvesting. If considered early on and designed with SuDS, this policy is achievable alongside the SuDS/flood risk priorities.						Comments noted and acknowledged.

						Features such as SuDS planters have minimal land take and are appropriate for residential and non-residential sites. They provide surface water attenuation for roof runoff, amenity (via planting regime) and habitat (for insects and mammals, depending on the product chosen). We would encourage the LPA to research these features and would be glad to provide further context and explanation around these features if desired.						
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245	Climate Change	CC6	Green roofs						CC6 – Green roofs The LLFA support the use of green roofs. We would encourage that blue-green roofs are used, which will allow for surface water runoff to be stored at source on the roofs of new buildings. Blue-green or blue roofs can be distinguished from green roofs by having a formal element of storage on the roof, restricted by a flow control.			Comments acknowledged and noted.
247	Climate Change	SP1, CC1	Net zero buildings									Comments noted and acknowledged.
254	Climate Change	SP1	Sustainability									Comments noted and acknowledged.

255	Climate Change	CC8	Green Economy							<p>Policy CC8: The Green Economy, will support development proposals which demonstrate consistency with the principles of a circular economy. The County Council welcomes the inclusion of new Policy CC8: The Green Economy, which gives key consideration to the management of demolition and construction waste, with the expectation that applications for major development will be accompanied by a Site Waste Management Plan (SWMP). The County Council suggest</p>	
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											that additional wording be incorporated into Policy CC8 encouraging an increased use of secondary and recycled aggregates. Encouraging an increased use of secondary and recycled aggregates helps to reduce the need for virgin sand and gravel and other virgin aggregates such as crushed rock. The County Council, as the Minerals Planning Authority, wishes to reduce the reliance on virgin sand and gravel wherever possible and increase the use of secondary	
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											<p>and recycled aggregate as an alternative. This aligns with the core principles of Policy CC8. It is suggested that the following wording or similar is inserted into Policy CC8: The Green Economy, on page 81 after section 6A.57, which details how circular economy principles in development can be adopted, and how materials can be salvaged and recycled in order to extend the life of buildings. 'The principles of a circular economy can be</p>	
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											<p>demonstrated in development projects through using secondary and or recycled materials in the construction of the project. For example, secondary and or recycled aggregates could be used as a substitute material in the production of concrete. This would increase resource efficiency, promote a circular economy for waste materials, and also reduce the need for virgin sand and gravel.'</p>	
259	Climate Change	SP1	Support SP1									Comments acknowledged and noted.



261	Climate Change	SP11	Flood Risk								<p>Criterion (a) of SP11 applies to both the site selection stage and site layout stage.</p> <p>The council is mindful of the need to undertake a more comprehensive review of its flood risk and pollution policies and update its SFRA. This will be considered as part of the full review of the plan, which commences next year.</p> <p>The council is also mindful of changes to the SuDS approval process and references to past versions of the NPPF. The council is content that these do not necessitate any changes to policy or subtext.</p>
262	Climate Change										<p>Comments noted. No change.</p>

263	Climate Change	CC1	Emissions	<p>New Policy CC1 – Energy Efficiency</p> <p>We support the ambitions of Policy CC1. It would be useful to understand how you have established your target figures, particularly the 35%. Is there an opportunity here to be more aspirational with your targets, for example. In relation to the requirement to provide post-construction monitoring and reporting to cover a period of five years from build completion, how do you intend to monitor this and is it something that is enforceable within this context?</p>								Comments acknowledged and noted.
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264	Climate Change	CC2	Heating and cooling		<p>New Policy CC2 – Heating and cooling</p> <p>We agree with the addition of this policy to help control extremes of temperature within buildings in the Borough. The policy may benefit from discussing other factors that can help achieve this balance including more efficient dwelling form factors and optimising fenestration and shading. We also support the promotion of passive ventilation but the inclusion of mechanical ventilation with heat recovery (MVHR) which is likely to be required for highly insulated/energy efficient buildings. In the supporting text for this policy, it states that</p>							<p>In practice, the fact that householder developments will have to comply with the policy will mean that householder applications which involve energy-dependent cooling systems are likely to be refused. No further monitoring will be required.</p>
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					householder proposals will not need to submit energy statements but will still be expected to comply with the policy, how will this be enforced and monitored?								
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265	Climate Change	CC3	Water Efficiency		<p>New Policy CC3 – Water efficiency</p> <p>Whilst we support the addition of this new policy, the target of 110lpppd for water efficiency should be more ambitious. 110lpppd is the Building Regs alternative standard, but it is not sufficient to respond to the water pressure on water resources in the area. South Cambridgeshire and Tower Hamlets have consulted on a target of 80lpppd in their recent Reg 18 consultations; we would urge Stevenage to aim to achieve these more ambitious targets.</p>					<p>The ability of local authorities to set water usage targets beyond the Building Regulations optional standard is questionable. In any event, the council has no evidence to support a more stringent standard. No change.</p>
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266	Climate Change	CC4	Energy Infrastructure				<p>New Policy CC4 – Energy infrastructure</p> <p>We welcome the promotion of district heat networks particularly in areas where there are strategic development sites across our boundaries where the scale of joint developments proposed would facilitate such schemes.</p>				Comments noted. No change.
267	Climate Change	CC5	Carbon Sinks				<p>New Policy CC5 – Carbon sinks</p> <p>We support the inclusion of this new policy; however, we recognise that given the underbound nature of the Borough, any gain in carbon sinks</p>				Comments noted. No change.

								is likely to be limited on a large scale. We recognise the cumulative effect of small gains within Stevenage and support this within this policy.			
268	Climate Change	CC6	Green roofs					<p>New Policy CC6 – Green roofs The policy title should include Green walls in addition to Green roofs. Both provide a substantial contribution towards reducing surface water runoff as well as climate change adaptation/mitigation.</p> <p>Whilst the policy currently notes that Green walls are harder to install and maintain, this is not considered to be the case if they are designed into the construction and architecture of the building from the outset. This should not be a reason in itself to reduce the importance of</p>			The difficulties in installing and maintaining green walls are well documented. In any case, the title of the policy is of little consequence. No change.

									such features in the policy.			
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269	Climate Change	CC7	digital connectivity and buildings regs							New Policy CC7 – Digital connectivity We support the inclusion of this policy, but we are not sure that the Climate Change chapter is the best place for it. Supporting high quality communications is a separate topic in the NPPF and perhaps it would be best placed to place this policy in a separate section to reflect its importance.		Comments acknowledged and noted.
270	Climate Change	CC8	The Green Economy							New Policy CC8 – The green economy We welcome the promotion of the green economy and circular economy principles; the Policy may benefit from the requirement for developers to submit a circular economy statement		Comments acknowledged and noted.

												and/or specific targets for recycling / diverting site waste from landfill.	
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SBC_Comment_ID	Agreements (other consultees agreeing with comment)	Theme of Comment	Local Plan Policy No.	Key words from text	Do you have any comments on new Policy FP1: Sustainable Drainage?- Flooding and drainage	Do you have any comments on the new Policy FP2: Flood risk management? - Flooding and drainage	Any other comments can be placed here? - Flooding and drainage	SBC_Response

22		Flooding and drainage	FP1		<p>Does more need to be done to recommend searches and investigation of sites before proposals for appropriate drainage are submitted? Recent examples include developments around North Road that have had to introduce substantial drainage enhancements, which I believe are after commencement of the schemes. Perhaps there could have been greener and visually pleasing options if investigation had been done earlier.</p>	-	-	<p>This is not an unreasonable suggestion. However, it's unlikely that the costs of such a policy would justify the benefits. Design teams are generally very good at anticipating site conditions and the additional investigations/surveys carried out after permission has been granted are for the most part to determine whether a drainage system can rely more heavily on infiltration or, where relevant, to determine which parts of an existing drainage system require maintenance or replacement. It is therefore rare for these tests to necessitate comprehensive redesign.</p> <p>It's also the case that changes to SuDS can be required for all manner of reasons, not necessarily directly related to flood risk and drainage. SuDS design is influenced heavily by site layout, so if changes are required to the size or position of a building, for example, it is highly likely that the drainage layout will also need to be amended. These sorts of changes post-permission are entirely normal and expected, particularly for large and complex developments. It's also worth highlighting that the changes around North Road were not the result of SuDS-related site investigations.</p> <p>Actions: None.</p>
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23	Flooding and drainage	General Flooding	-	-	<p>My comments are on changes to existing properties - we must not allow people to pave gardens for car parking unless the paving is water permeable.</p> <p>If it was possible it would be good to remove the right to use plastic grass too.</p>	<p>Broadly agreed. Permeable paving isn't always appropriate because it serves little purpose if the underlying ground conditions are such that the water cannot then infiltrate. However, if permeable paving isn't appropriate, it's important that surface water run-off is directed somewhere other than straight out onto the public highway.</p> <p>These principles are already reflected in the council's supplementary planning documents. They are also reflected in the relevant class of permitted development rights.</p> <p>The council cannot influence the use of plastic grass as this does not constitute development.</p> <p>Actions: None.</p>
181	Flooding and drainage				<p>In relation to Policy SP11 it is considered that the policy and supporting text could be more effective in relation to pollution may clarifying that pollution includes noise, light and odour pollution. The policy could also seek to protect the amenity of future occupiers of new development by ensuring that sensitive development is not located in areas where it would be adversely</p>	<p>The proposed wording of Policy SP11 is considered to be appropriate for a strategic policy. It is important to note that it is supported by a set of detailed policies, among these are: Policy FP7, which clarifies that pollution includes air, light and noise pollution; and Policy FP8, which seeks to prevent pollution-sensitive uses from being introduced to areas where they would be affected by existing or planned sources of pollution.</p>

							affected by existing sources of pollution unless any necessary mitigation measures are secured.	
193		Flooding and drainage		<p>Policy FP1: Sustainable drainage (p172)</p> <p>We support the changes to this policy aimed at ensuring utilisation of sustainable drainage systems wherever possible, including the incorporation of green infrastructure such as ponds and green roofs/walls where appropriate.</p>	<p>We welcome the emphasis in Policy FP2: Flood risk management on the re-naturalisation of watercourses, which can benefit local biodiversity as well as enhancing flood defences.</p>		Comments acknowledged and noted.	

227		Flooding and drainage	FP1	SuDs hierarchy	Policy FP1: Sustainable Drainage Good to see that all development must incorporate SuDS, aim for greenfield run off rates, and follow SuDS hierarchy.		Comments acknowledged and noted.
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## Policy FP2 Flood Risk Management

Its very positive to see that that Flood Zone 3b and buffer zones will be kept free from development, and that culverts will be opened up. Good strong wording that all development proposals 'must' - however a few proposed wording changes: (a) Flood risk must not increase and must be reduced where applicable, taking future impacts of climate change into account over the lifetime of the development.

(c) Pass the sequential and exception tests, as required, and apply the sequential approach to specific site layouts.

(d) Protect the integrity of adjacent flood defences and allow sufficient space for access, maintenance, future upgrades and new schemes where applicable.

For bullet point (j) it would be useful to have a accompanying guidance paragraph that explains the definition of what resistant and resilient means.

We would also propose to add an extra point:

(k) Use nature-based solutions to manage flood risk in the first instance where appropriate due to their multi-functional benefits.

240		Flooding and drainage	FP1, FP2			AWS supports Policies FP1: Sustainable drainage and FP2: Flood risk management. We particularly support new Table 4 (page 172) as the capacity of existing sewers will be increasingly tested by infiltration and more intense and frequent rainfall events. AWS would welcome consideration of the attached position statement on drainage and flooding and the progression of the four points through the Local Plan and implementation work including the approach taken by the LLFA.	Comments noted and acknowledged.
241		Flooding and drainage	SP1, FP1, FP2	Stronger approach to climate change and sustainable drainage and flood risk			Comments Noted.



276		Flooding and drainage	FP1	<p>New Policy FP1 – Sustainable drainage</p> <p>The only clear and convincing reason for not providing SuDS on development proposals is in relation to the previous land use being contaminated, and it is not possible to remediate the site. Or the development site is too close to a potable water extraction site, which there are a number of in Stevenage. Criterion c) is vague; developers should be required to fully demonstrate why they cannot achieve greenfield run-off rates rather than merely aim to achieve greenfield run-off rates. We support the requirement to not discharge surface water to the foul network. However, we understand that there are areas within the Borough where</p>		<p>The most obvious reason for not providing SuDS is that a development has no effect on the ability of land to absorb rainwater. This may include changes of use of land, conversion of existing buildings, certain types of engineering operations, etc.</p> <p>The aim to achieve greenfield run-off rates is taken directly from HCC LFRMS2 Policy 15. There is no evidence to suggest that a more stringent policy is required.</p> <p>Discharge to surface water sewers or combined sewers are not the most preferable options and this is reflected in the disposal hierarchy shown in table 4. They nonetheless remain part of the hierarchy, which is taken from the practice guidance on the non-statutory technical standards for SuDS, in turn referred to by LFRMS2 Policy 13.</p> <p>No change.</p>
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				there is a dual network system, even in these areas, surface water should not be discharged to the surface water network and should be managed through the use of SuDS.			
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Flooding and drainage

FP2

New Policy – Flood risk management  
We support the updating of Policy FP2. Criterion d) should be strengthened and functional floodplain should be preserved, protected, and where possible the buffer area adjacent to it should be extended to account for climate change in the future. Criterion f) should be widened to a 10m buffer zone for main rivers, measured from the top of the bank. This is in line with other Local Authorities and accounts for climate change. The 8m applies to environmental permits issued by the Environment Agency for activities carried out adjacent to main rivers. Along similar lines, criterion g) does not provide a sufficient or adequate size buffer zone for ordinary watercourses in the Borough. 3m is not of sufficient width to function as a wildlife corridor or as habitat. This buffer zone should be increased to make adequate provision. Paragraph 13.23 does not need an amendment to 'deculverting' as indicated in the schedule of changes.

Criterion (d) of FP2 is considered to offer sufficient protection to Flood Zone 3b as currently worded and there is no evidence to warrant the creation of a buffer zone as suggested.

Likewise, there is no evidence to warrant extending the buffer zones to main rivers or ordinary watercourses. The purpose of the buffers is to prevent overlap with the consenting regimes and allow for the relevant authorities to properly carry out their duties. The figures are taken directly from HCC and Environment Agency guidance, and neither body has raised concerns with them.

The spelling of deculverting has been amended.

SBC_Comment_ID	Agreements (other consultees agreeing with comment)	Theme of Comment	Local Plan Policy No.	Key words from text	What are your comments on the revised Policy NH5: Trees and woodland? - Tree Policies	What are your comments on the new Policy NH5b: Tree-lined streets? - Tree Policies	SBC_Response
8		Tree Policies	NH5a		Policy NH5(a) - No mention of impact of light pollution on trees woodland or need to consider impact of light pollution on biodiversity linked to woodland/trees	-	Policy FP7 requires development proposals to demonstrate that pollution, including light pollution, would have an acceptable impact on the natural environment. Duplicating these provisions in Policy NH5a is unnecessary.
9		Tree Policies	NH5a, NH5b		Should new developments that include the planting of additional woodland be stated as being strongly supported?	Fully agree that the default should be that all new streets created should be tree-lined.	<p>The planting of new woodland is likely to be a rare occurrence unless already mandated by another policy (e.g. to compensate for biodiversity loss). An unintended consequence could therefore be that the council would have to attribute positive weight for the planting of woodland, even though that planting is only proposed to mitigate some other form of harm. This would be highly undesirable.</p> <p>The comments regarding Policy NH5b are noted.</p> <p>Actions: 1. Consider amending Policy NH5a to express support for the planting of new woodland.</p>

20		Tree Policies	NH5a, NH5b		<p>Generally this policy seems sound - we must increase our trees and ideally climate change safe native trees should be preferred.</p>	<p>Residential street trees must be added - replacing car parking spaces would be a good thing. When I arrived in Stevenage (1987) there were many more street trees. We must reverse this trend. However when trees are added they must be suitable varieties. I have a tree next to my property that has already caused major damage to the drain system because it is a woodland tree and too large for its location.</p> <p>I have commented on trees along cycleways on another question. But this is another way to add both more trees and incorporate more biodiversity.</p>	Comments acknowledged and noted.
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101		Tree Policies	NH5a, NH5b		<p>The natural seeding of trees and shrubs should be encouraged. Much of the concrete underpasses and cycle ways have been greatly improved by the natural encroachment of greenery. it is also the solution to unsightly defacing of walls targeted by graffiti. The artistry, recently created in the cycle and walkways, is an excellent example of how areas, where greenery will not naturally grow, can be presented.</p> <p>Stevenage New Town was a concept created fifty years too early. A time when everybody was becoming drivers. The 'clean cut' image of the fifties was austere and now has become financially unsustainable. The rebirth of the town, with mature trees and natural foliage has 'softened' the original image to one in line with current feelings about the environment and is much more human friendly. Further investment in the cycle lane network is to be encouraged, the recent up grading north of the Old</p>	<p>High Street Old Town</p> <p>The re-planting of trees along The Avenue after the storm, has brought life back to this historic area. A program of this nature would benefit many other areas where concrete prevailed in the past. The cost of this program is justified expense, long term and of benefit for all together with the legacy for future generation.</p>	Comments acknowledged and noted.
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				Town shows what can be achieved with good planning.		
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105		Tree Policies	NH5b		-	This is a huge improvement - It will be really good if street trees could be added to existing streets. I remember when I arrived in Stevenage (30 years ago) many of the roads had street trees that have been removed over time. I would really encourage their replacement.	Comments acknowledged and noted.
113		Tree Policies	NH5a, NH5b		We need to protect all our woods	This is great plan and will help with the air pollution	Comments acknowledged and noted.
163		Tree Policies			Living in a property backing onto fairlands woods it is a constant struggle to get the council to tend to the trees they already have responsibility for. I understand the need to plant trees but sort the the current woodland areas and replant within these first	Too few resources to care for the trees they already have responsibility for.	Noted but trees that the council has responsibility for will only make up a very small proportion of the trees the policy will apply to. In any case, the policy does make provision for management.
174		Tree Policies	NH5a, NH5b		Regulations which may be sidestepped under unspecified circumstances with the application of money is at best a tax and at worst *****. The circumstances under which payment can be made in lieu of tree-planting should be specified.	I am greatly for this proposal.	The intention is that a financial contribution would be a last resort, available only when it would not be possible to provide all replacement planting on-site and priced at a level that would discourage use. Ultimately the objective is to prevent healthy trees from being felled at all but where a financial contribution is made, it would be used solely to fund off-site tree planting. Additional subtext to clarify the circumstances under which a contribution might be acceptable is worthy of consideration.



187		Tree Policies			<p>I support the proposal for tree lined streets, but object when the following considerations are not included:</p> <ol style="list-style-type: none"> <li>1. Tree lined streets that are designed without cycle path make retrofitting one significantly more difficult, or even impossible. This must be prevented.</li> <li>2. Active travel, including cycling, must come first in the design of tree lined streets and be included by default. This will prevent situations in which there is no space for a cycle path while one is required.</li> <li>3. Cycle paths on the other side of the tree line alongside tree lined streets require separate lighting.</li> </ol>	
194		Tree Policies		<p>We welcome the updated Policy NH5a which strengthens protection for existing trees and woodland, and incorporates revised replacement ratios that depend on the size of trees lost, as we have previously advocated.</p>	<p>We also welcome new Policy NH5b which states that new streets should be tree-lined by default.</p>	<p>Comments acknowledged and noted.</p>

224		Tree Policies	NH5	new trees	<p>Thank you for consulting the Forestry Commission on your partial local plan review. We welcome the new tree policies. The Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach. For instance through:</p> <ul style="list-style-type: none"> <li>• The inclusion of green infrastructure (including trees and woodland) as a requirement in and around all new development. As stated in the Environmental Improvement Plan 2023 it is a strategic government objective to increase the net area of tree canopy and woodland cover to 16.5% of total land area in England by 2050. It goes on to state that that increasing tree cover is key to achieving the Net Zero Strategy and species abundance targets. The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for</li> </ul>	Comments acknowledged and noted.
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				<p>loss.</p> <ul style="list-style-type: none"><li>• Promoting the use of home grown timber used in construction as a sustainable building material, therefore reducing the embodied carbon emissions of new builds. In line with the Government's 25 Environment Plan (Page 47), the "Timber in construction" roadmap and the Net Zero Strategy. We would expect to see careful consideration of any impacts and any weightings which might be applied to any assessment of potential sites, especially those affecting Ancient Semi Natural Woodland and Priority Habitat Woodland.</li></ul>		
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278		Tree Policies	NH5a	Support NH5a	New Policy NH5a – Trees and woodland We support the amendment and inclusion of a more thorough policy as set out in Policy NH5a.	Comments noted. No change.
279		Tree Policies	NH5b	Support NH5b	New Policy NH5b – Tree-lined streets We support the addition of this policy; however, it should be noted that tree-lined streets can act as a pollution trap along roads. Such streets should be planted in such a way to provide shade and habitat, whilst also allowing for pollutants from road traffic to disperse through the tree canopy.	Comments noted.

SBC_Comment_ID	Agreements (other consultees agreeing with comment)	Theme of Comment	Local Plan Policy No.	Key words from text	What are your comments on the revised policy? - Station Gateway Opportunity Area	SBC_Response
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6		Station Gateway Opportunity Area	TC4	Station Gateway	Fully support the demolition of the leisure centre and the move of the facilities to a more appropriate location. There is a huge opportunity to create a much better train station, linking it to the town, bus station and other facilities. This will draw more people into the town rather than filtering into the leisure park or immediately getting into a car and travelling away. Careful consideration needs to be given to the traffic implications of closing the road and there may need to be junction improvements to other roads around the Stevenage town centre.	Comments acknowledged and noted.
19		Station Gateway Opportunity Area	TC4		I am basically in favour of the policy - It is essential that the existing fast north south Route 12 cycleway is retained since this is effectively a cycle highway. the addition of a route further to the east.  I like the last radical proposal for the restructuring of Lytton way. This will make the village feel more human scale.	Noted.
161		Station Gateway Opportunity Area	TC4		Lytton Way proposed reconfiguration Options 0 and 1 are incompatible with the aims of having an attractive pedestrian gateway and incorporating sustainable travel. As such, they do not comply with the local plan, so should be explicitly ruled out as possibilities.  Another stated aim is 'celebrating the heritage of the town'. I consider the current railway station to be of great cultural and architectural value. I do not believe that demolition is the only solution to the problems the station faces. The gateline should be widened into where the ticket office is, and the ticket office should be moved to where the convenience store is. With redevelopment of Lytton Way, additional room for nearby retail may be provided, along with the supposedly needed larger drop off and taxi rank facilities. The capacity of the shallow stairs may be increased by reinstating the travelator that used to be there.	Policy TC4 has been designed to ensure there is flexibility for options 1 – 3. Sustainable travel has been built into the policy wording to ensure all forms of transport, especially cycling and walking, are factored in to any potential future development. The policy wording for TC4 includes the design principle for any future applications and is shown below: vii. Improved cycle connectivity and parking plus drop-off space to specifically serve train customers;  The train station has recently celebrated 50 years since it was opened, and it's heritage has been recorded for future generations. Any development which affects the station will be considered appropriately by all.
164		Station Gateway Opportunity Area	TC4		I believe option 3 the way to go as bus interchange is close to station and be even closer if proposal to build new Stevenage station where car park adjacent to police station is	Comments acknowledged and noted.

172		Station Gateway Opportunity Area	TC4		<p>At present access from street level to the ticket/boarding area for the station is very limited for disabled, pushchairs and people with luggage. Please could your plans include better provision that is not limited by disabled keys or night-time closures, bearing in mind that we are now on a train line with direct links to Gatwick airport.</p>	<p>This has been noted. During the Station Gateway Area Action Plan consultation (AAP) accessibility was highlighted as an issue and this has been recognised within the subtext of the policy in paragraph 7.39.</p> <p>A high quality major mixed-use redevelopment around the train station that addresses these concerns is necessary to meet the growing expectations of a rising population and the international business community located in the Borough. Such schemes will enable the station to have an improved concourse and booking facilities, easy and improved accessibility for all pedestrians.</p>
178		Station Gateway Opportunity Area	TC4		<p>We broadly support the changes to the overarching spatial strategy for the Local Plan which shows an update to the use classes and development focussed within the Station Gateway Opportunity Area. This is once again in line with the updated climate change policy.</p>	<p>Comments acknowledged and noted.</p>

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192		Station Gateway Opportunity Area		<p>Policy TC4: Station Gateway Major Opportunity Area (pp98-101 )</p> <p>We welcome:</p> <ul style="list-style-type: none"> <li>● acknowledgement that tackling climate change is one of the most important objectives requiring a response from the Station Gateway AAP;</li> <li>● the aspiration to create an exemplar low-carbon development and active public realm in the re-developed Station Gateway area;</li> <li>● the emphasis on mixed-use development to meet the needs of local communities.</li> </ul> <p>The following comments assume the adoption of Option 2 of the AAP:</p> <p>We welcome the statement at 7.39C that Potential Layout 1 is the preferred cycle layout.</p> <p>To protect air quality in the re-developed Station realm, we encourage SBC to limit permitted waiting times for passenger drop-off/pick-up, and to implement a no-idling policy in drop-off areas, to reduce vehicle emissions. Provision for people with mobility issues could emulate designs such as at Cambridge railway station where a segregated single lane for setting down and picking up is in place.</p> <p>Designs should prioritise provision for active travel modes (walking/cycling/public transport) and the needs of those with reduced mobility and should be developed through ongoing consultation with users.</p> <p>We would advocate the adoption of a 20mph speed limit on Lytton Way once redeveloped, to support the objective of creating a welcoming public realm in this area.</p>	<p>Comments noted. Policy TC4 has been designed to ensure sustainability is considered. Sustainable travel has been built into the policy wording to ensure all forms of transport, especially cycling and walking, are factored in to any potential future development.</p> <p>The policy wording for TC4 includes the design principle for any future applications</p> <p>vii. Improved cycle connectivity and parking plus drop-off space to specifically serve train customers;</p>
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196		Station Gateway Opportunity Area		The policy is supported as the design and land use principles encourage active travel (principles i, viii and x) and the creation of spaces that would support physical activity (principle vi). The principles in the policy would align with Sport England's Active Design guidance <a href="https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</a> and be consistent with paragraph 96 of the current NPPF. Principle iv is specifically supported as this recognises that the strategically important sports facilities in the Arts & Leisure Centre need to be replaced within the town centre to facilitate the demolition of the existing centre	Comments acknowledged and noted.
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206		Station Gateway Opportunity Area		<p>SP4 A Vital Town Centre</p> <p>Muse strongly support the promotion of the comprehensive and co-ordinated regeneration of Stevenage Town Centre. It is noted that the policy includes very specific land uses and floorspace targets for different land uses and the number of homes. As Muse works up its proposals for the Station Gateway it would be useful to review the detail of the policy. For instance, there is potential for Build to Rent housing, co-living and a wide range of employment and research opportunities and it is important that these are supported alongside those uses currently listed in the draft policy.</p> <p>TC4 Station Gateway Major Opportunity Area</p> <p>Muse support the changes to the policy which seek to update the specific requirements, consistent with the AAP process and climate change imperatives. As it works up its masterplan for the Station Gateway area it would welcome the opportunity to work with the Council to:</p> <p>Refine the specific requirements of the policy to ensure it is deliverable and provides an appropriate amount of flexibility with, for instance, encouragement for Build to Rent homes, co-living and a wide range of employment opportunities (see comments on SP4 above).</p> <p>1. Help define what is meant by 'an exemplar low carbon urban village' (criteria ii). Muse support the principle of such aspiration and, as set out in the comments on draft policy SP1, it is important that this is carefully defined to ensure that it delivers development which meets a shared objective to address climate change whilst also being able to deliver new jobs, homes and necessary new infrastructure which the policy also seeks to deliver.</p>	<p>The comments have been noted and the policy will be amended to reflect flexibility in approach to TC4. Use Class E(g)(ii) (Research and development), is another use class which will be added to the policy definition as stated in the Reg 18 comments. The council supports the flexibility of employment uses. We will also recognise the support for a range of C3 types.</p> <p>SP4 already contains the wording:</p> <p><b><i>b. Promote the comprehensive and co-ordinated regeneration of Stevenage Central (Town Centre plus adjoining sites). This will provide for in the order of 4,700m2 of additional comparison retail floorspace, 3,000 new homes and an improved range of shopping, bars, restaurants, leisure, community, civic and cultural facilities. An extended and regenerated train station will be the focus of an enlarged Stevenage Central area, within which six Major Opportunity Areas will be designated to promote distinct mixed-use redevelopment schemes.</i></b></p> <p>Stevenage Borough Council are flexible to priorities in the Opportunity Areas, including a range of C3 uses. Any potential development will also be in accordance with other policies in the plan, in particular SP1 and CC1 - CC7.</p>
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214		Station Gateway Opportunity Area	TC4		<p>The Station Gateway Major Opportunity Area is focussed around the station in Stevenage and is outside the immediate setting of the Town Square Conservation Area and its associated heritage assets. Therefore, it is not considered a highly sensitive location. However, the wider town centre area is an intrinsic part of the setting of the central area, and the masterplanning itself is of historical interest. This should be taken into account as proposals are developed.</p> <p>We therefore welcome criteria ix and supporting text paragraphs 7.38A to 7.38F, which require that applications "celebrate the heritage of the town in the fabric, layout, and design of the Station Gateway." We hope that this will lead to thoughtful designs that reflect the local character and history, ensuring that development enhances rather than diminishes the historical context of the area.</p> <p>Our recommendation None.</p>	Comments acknowledged and noted.
246		Station Gateway Opportunity Area	TC4	Green infrastructure	<p>TC4 Could "green infrastructure in the public realm" be updated to "blue-green infrastructure"? SuDS features should be considered as part of any landscape proposals and if well designed can provide multiple benefits while still being attractive and contributing to high quality public open space/public realm.</p> <p>For further advice on what we expect to be contained within the FRA to support an outline planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage <a href="https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx">https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx</a> this link also includes HCC's policies on SuDS in Hertfordshire</p>	Agree with comments and will incorporate into text.

271		Station Gateway Opportunity Area	TC4		<p>Amended Policy TC4 – Station Gateway Major Opportunity Area</p> <p>To confirm, the removal of ‘an extended’ train station, ‘new bus station’ and ‘new multi storey car parking’ relates to the delivery of Platform 5, the relocated bus station on Lytton Way and the multi storey car park on the north car park site, and so their inclusion is not appropriate in the revision of Policy TC4.</p> <p>The delivery of the multi storey car park on the north car park has resulted in an apparently inaccessible parcel of land further north, bounded by Lytton Way, Fairlands Way and the East Coast Mainline. We understand that the parcel of land is in the ownership of Stevenage Borough Council and has the potential to create a landmark development which could be predominantly residential led, between 6 and 10 storeys in height. It would be interesting to have a little more clarity on the opportunities in this area. Whilst the supporting text refers to the options set out in the Station Gateway AAP, it deals heavily with the traffic options for Lytton Way rather than any other opportunities within the gateway area.</p>	The comments have been acknowledged and noted. Due to this review being only a partial review, these amendments have been noted for a full review in which these will be addressed.
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SBC_Comment_ID	Agreements (other consultees agreeing with comment)	Theme of Comment	Local Plan Policy No.	Key words from text	What are your comments on the new policy GD2: Design certification? - Design	SBC_Response
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24		Design			Surely we aim for the highest standards possible? In which case the policy should be worded to the effect that the highest rating proposals will be chosen over other weaker ones. I think that is what the last sentence is trying to say but this must be clear.	The council must balance the standards set in policy with what can actually be delivered by developers. In this case, the policy encourages developments to achieve high BREEAM/HQM ratings but does not require it. This means that if a development is designed to achieve these standards, that can be given positive weight when deciding whether or not to grant permission. However, if the standards are not achieved, then there will be no policy conflict. This is considered to be a balanced and appropriate approach.
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169		Design		<p>As you are aware the current National Planning Policy Framework (NPPF) states that local planning policy and decisions are to Promote healthy and safe communities. In paragraph 96 (b) it states that “96. Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which: (b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion “ for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas;” However on page 56 of the current local plan Policy SP;8 Good Design makes no mention of the need to address issues around crime, disorder, and the fear of crime “ Yet it is one of the policies cited as the replacement for the old policy TW10 “Crime Prevention”™. This needs to be reassessed and should include reference to the Police preferred minimum security standard that is Secured by Design (SBD). In addition, the National Modal Design Code (NMDC) states in part 2 chapter 8 “ “Public Space”™ s.P3.i Secured by Design “ states “Neighbourhoods need to be designed to make all people feel safe and to reduce the incidence of crime in accordance with the recommendations of Secured by Design which includes guidance for housing, commercial space, schools, hospitals and sheltered accommodation. Support and advice is available from the police through a network of Designing Out Crime Officers (DOCs) across the UK. Secured by Design advice incorporates proven crime prevention techniques and measures into the layout and design of places and spaces.” Again, this advice appears to have been omitted.</p>	<p>Comments acknowledged and noted. Consideration has been given. Policy SP8 updated to include reference to reducing crime and the fear of crime in new developments.</p>
203		Design		<p>Therefore, to ensure that Policy SP8 ‘Good Design’ is consistent with national policy we would request the inclusion of a policy strand such as:  “take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</p>	<p>Comments noted and wording checked.</p>

274		Design		<p>New Policy GD2 – Design certification</p> <p>We support the introduction of a policy requiring design benchmarks/ certification. The policy mentions BREEAM as a method to measure performance. Is BREEAM the most appropriate standard or should the policy be broadened to incorporate other standards such as LETI or Passivhaus.</p> <p>Paragraph 10.5 of the Local Plan refers to the old Design Guide SPD adopted in 2009, this should be updated and refer to the SPD adopted in January 2023. This wording update should then be included in the schedule of changes for Reg 18.</p>	<p>BREEAM is considered to be the most appropriate standard because it is the most established and wide-ranging. The council is content that references to previous SPDs do not need to be updated as part of the partial review. No change.</p>
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SBC_Comment_ID	Agreements (other consultees agreeing with comment)	Theme of Comment	Local Plan Policy No.	What are your comments on the new policy HO14 Houses of Multiple Occupation (HMOs)?- Houses of Multiple Occupation (HMOs)	SBC_Response
25		Houses of Multiple Occupation (HMOs)	HO14	I am not against HMO's but since these residents are usually less affluent if MUST be included in requirements that cycle facilities must be available and easy to use by everyone. This means no lifting and easy access to the front of the property.	Agreed. Cycle parking requirements for HMOs are set by the Parking and Sustainable Transport SPD and must be complied with according to Policy IT5.
112		Houses of Multiple Occupation (HMOs)	HO14	I am dead against HMOs as they are taking good family home	The proposed policy only seeks to clarify the existing position, as there is currently no policy specifically for HMOs. There would be no justification for introducing a general presumption against the creation of new HMOs.
167		Houses of Multiple Occupation (HMOs)	HO14	I am not happy with this approach. Landlords profiteering	The proposed policy only seeks to clarify the existing position, as there is currently no policy specifically for HMOs. There would be no justification for introducing a general presumption against the creation of new HMOs.

171		Houses of Multiple Occupation (HMOs)		Page 154 Policy HO14 deals with Houses of Multiple Occupation (HMOs) again it is suggested that reference to SBD and Hertfordshire Constabulary's Crime Prevention Design Service should be made here due to the impact that SBD has on issues regarding crime, disorder, and the fear of crime.	Comments acknowledged and noted. Consideration has been given. Policy SP8 updated to include reference to reducing crime and the fear of crime in new developments.
173		Houses of Multiple Occupation (HMOs)	HO14	HMOs have a significant impact on residential areas. We have seen it first hand. Parking, which is at a premium in many areas is impacted by HMOs which then swamp the close surrounding area into people parking dangerously with no thought for others. In addition, noise issues also impact on the residents close to an HMO as their friends & family visit. At times it can feel like living next to a hotel with noise 24/7 which is not how a residential street/area should be. The voice of all residents where an HMO is being proposed should be heard, importantly included in any proposed change. Their voices should not be ignored.	<p>Developments are required to have an acceptable impact on highway safety by Policy IT4. Compliance with parking standards is required by Policy SP5. Acceptable noise impacts are required by Policy GD1 and Policy FP7. These policies apply to HMOs as they do to other forms of residential accommodation.</p> <p>Since 2017, it has been necessary to apply to the council for planning permission to convert a dwellinghouse into an HMO. Upon receipt of such an application, the council has a statutory duty to consult neighbouring occupiers and take into account any responses when deciding the application.</p>

176		Houses of Multiple Occupation (HMOs)	HO14	<p>I accept that a room in a house of multiple occupation can help with the overall housing shortage but the pressure on car parking in roads with several HMOs can be disadvantageous to all who live in the road. Therefore I think it is only sensible to only allow HMOs, whether large or small, in exceptional circumstances. And, even then, there should be a stipulation that there is only a maximum of one allowed per road/close.</p> <p>People who pay Council Tax in one of the higher bands hope that by paying a bit extra they can park their cars near to their homes.</p>	<p>The proposed policy only seeks to clarify the existing position, as there is currently no policy specifically for HMOs. There would be no justification for introducing a general presumption against the creation of new HMOs.</p>
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186		Houses of Multiple Occupation (HMOs)		<p>I object to HO14 in its current form because of several important omissions:</p> <ol style="list-style-type: none"> <li>1. Cycle parking is not referred to, even though it is arguably even more important in the case of HMOs. It also partially addresses any car parking issues that an HMO might otherwise cause.</li> <li>2. Cycling should be more convenient to use through conveniently located cycle parking that is usable by people from the ages of 8 to 80 and easy to reach when departing or arriving.</li> <li>3. E-bike charging facilities should be present in the cycle parking facilities of an HMO</li> </ol>	<p>Policy IT5 requires developments to comply with the Parking SPD. In turn, the Parking SPD sets cycle parking standards for HMOs and requires compliance with the cycle parking design standards set by the county council.</p>
273		Houses of Multiple Occupation (HMOs)	HO14	<p>New Policy HO14 – Houses in Multiple Occupation          Whilst we support the inclusion of this new policy, it would be pertinent to point to policies/policy subjects that you want the HMO's to comply with in particular within the policy of supporting text.</p>	<p>See paragraph 9.98F. No change.</p>

SBC_Comment_ID	Agreements (other consultees agreeing with comment)	Theme of Comment	Local Plan Policy No.	Key words from text	Please let us know your Other / General comments here? - Other Comments	SBC_Response
1		Other Comments	HO1/13	Housing site allocation	Local Scout groups provide so much for youngsters who have precious little resources for things to do that keep them occupied in constructive ways with good role models and opportunities to really become a part of their community. Horrified that such a local resource, including the trees on site would be demolished to build more flats. Do better Stevenage Council. Find a site that's not used already for community cohesion.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
2		Other Comments	HO1/13	Housing site allocation	I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. I was disappointed to read that the council have yet again chosen this site for a development of multiple homes. As can be read on the other comments, this is a wholly inappropriate area for such a development, but I wanted to comment on a personal level how the Chells Scouts have been life changing for my son who has special needs. He joined several years ago and has gained so much in the way of confidence, skills, and most importantly, wonderful friendships that he has been unable to find elsewhere, even at school. I am sure this applies to other children as well and that the Council take this into consideration when making their decision.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

3		Other Comments	HO1/13	Housing site allocation	<p>Ref H01/13 I oppose to the plan for 18 houses to be built on the land where Chells Scout Hut currently sits. The Scout hut is a vital part of the community, giving over 100 young people a safe place to come each week to develop friendships, confidence and skills in a number of different areas. The hut and outside areas allow the group to carry out numerous activities and events within safe confines. The trees and wildlife help the group to connect with nature and have a better understanding of the world.</p> <p>The "Healthy Stevenage Strategy"™ aims to reduce childhood obesity and increase physical activity. If the houses are to be built, children and adults would have even less spaces as to where they can develop their physical fitness. Mental health issues are on the rise in both children and adults at an alarming rate, if the Scout Hut was to be removed, the loss of opportunities available to both children and adults would be detrimental and add more stress to the ever-stretched NHS. To loose the hut would be a great shame.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
5		Other Comments	HO1/13	Housing site allocation	<p>Ref H01/13 There is already a shortage of parking in Drakes Drive. 18 houses must be at least 18 cars minimum but most houses will have 2 or 3 cars which will push the lack of parking to unacceptable levels. I already have to sometime park 5 minutes away if I return late in the evening. There are no spare spaces to be had, there is no give. Do your traffic survey at 10pm when people are home!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
7		Other Comments	HO11	Housing and Older people	<p>Policy HO11 - Paras 9.87A - E M4(1) minimum entrance width very narrow. Can we set a wider minimum width, perhaps 850mm, as in M4(2). M4(1) is meant to make a property visible by a disabled person who can walk, but handrails are only specified for 3 or more steps. This is not sufficient, Can we tighten this to 2 or more steps and tighten the language around allowing houses to be built with a step to the front door so it is an absolute exception?</p> <p>Developers are given a getout, if building accessible housing would stop them meeting other goals, such as affordable housing goals. However, accessible housing is likely to be most in demand in the affordable and social sector. Can this be tightened up to ensure more accessible housing in the social and affordable sectors?</p>	<p>The council can only set a policy for which standard must be met and cannot alter the standards themselves. The Council recognises a higher need for M4(2) and M4(3) Amongst affordable tenures and this is reflected in the proposed policy albiet not explicitly.</p>

10		Other Comments	HO1/13		<p>I strongly oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. This will remove a vital community hub and a place for youth development.</p> <p>In addition, drakes drive is already overcrowded and there is no parking on street left in the evening. development of further 18 homes will only make the matters worse and local residents will suffer even more.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
13		Other Comments		Horse routes	<p>I respond on behalf of the Patchetts Green Bridleways Trust (which covers Hertfordshire) and the British Horse Society Hertfordshire Committee. We would like to see the return of the local plan commitment to preserving and completing the Stevenage Horse and Pony Route.</p> <p>There are many horse riders around the edges of the Borough. Paths that are dedicated as bridleways can also be used by walkers and cyclists.</p> <p>We would like to see the restoration of the plan from the last but one local plan. The text was:</p> <p>8.8.4 The Borough Council designated a Horse and Pony Riding Route in 1983 around the edge of Stevenage linking surrounding bridleways and incorporating a route diagonally across the Town through Fairlands Valley. The linking up of the existing Horse and Pony Route and its extension to the countryside is considered important as it is seen as an essential leisure facility and enables access to the countryside. It is therefore considered vital that the existing and proposed routes are protected. The retention, maintenance and extension of this route will therefore be promoted by the Borough Council. Developments which incorporate an existing Horse and Pony Route such as the development at Stevenage West will be expected to make provision to allow the routes to be extended into the surrounding countryside.</p> <p>POLICY L23: HORSE AND PONY ROUTE</p> <p>Any reduction to the existing and proposed Horse and Pony Route as shown on the Proposals Map will be resisted. Where appropriate, new developments will be expected to include land for the extension of the Horse and Pony Route. Any development which adversely affects the route will not be permitted unless a satisfactory alternative route is provided.</p> <p>The BHS and PGBT have some suggestions for slight changes to</p>	<p>Comments acknowledged and noted. This issue will be considered as part of the Full Local Plan Review which commences next year.</p>

					<p>the original route to accommodate development that has taken place since the original lines were determined, and we would like to liaise with the Council on the route to be shown on the local plan proposals map.</p>	
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14		Other Comments	HO1/13	Housing site allocation	<p>I wish to have the following comments considered in respect of HO1/13. The proposal to build 18 dwellings on the land currently occupied by the Chells Scout Headquarters needs to be cancelled.</p> <p>Although I recognise the need for additional housing in Stevenage, there is also a considerable need for amenities for young people as is noted in the Local Plan which states that there should be no loss of community facilities. Stevenage Borough Council has closed all its Play Centres and there is not adequate provision for regular activities for young people. Scouting is in a unique position to fill a necessary gap, but this can only be done comprehensively if a Scout Group has a suitable building with land attached. Many of the activities undertaken in Scouting require equipment (such as stoves, tents, pioneering poles) that has to be stored with easy access for weekly meetings.</p> <p>The Chells Scout Group is the largest in Stevenage with around 100 young people attending weekly meetings. Activities include environmental learning, cooking, camping skills and a wide variety of other useful life skills. These cannot be effectively done in a shared rented Hall. Whenever the weather is fine, Chells Scouts are outside using its attached field. Tent pitching cannot take place indoors, nor can the regular archery sessions or firelighting to name just three activities.</p> <p>Young people come to the Chells Scout HQ from all across the town, not just the local area, so adequate parking facilities are also required.</p> <p>I have been involved with the Chells Scout Group as a parent and leader for over forty years and cannot emphasise enough the value it contributes to the community.</p> <p>I object to the suggestion that the parcel of land currently occupied by the Chells Scout Group is considered better used solely for housing. The benefits to the Community provided by Scout far outweigh the need for a few houses.</p> <p>Ruth Jermy 257 Chells Way SG2 0LZ</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
15		Other Comments	HO1/13	Housing site allocation	<p>I strongly oppose the demolition of the scout hut. Yet again it's another resource being taken away from our children and other members of the community that use the building. The parking/flow of traffic can already be very difficult at that end of Drakes Drive during school drop off and pick up times especially so this will further increase that problem. Also there are a number of trees on the site and it concerns me that these will be cut down and wildlife affected.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated</p>

						elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
16		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The Local plan states in SP5 Infrastructure that Permission for new development needs to make reasonable provision for youth facilities. And in SP9 sections G and H both support the provision of community facilities. However, the proposal to replace a vital local community facility (the Chells Scout HQ) with housing, seems to be against both of these objectives.</p> <p>(A similar situation has already occurred where the 5th Scout HQ off Shephall View was sequestered for replacement with housing, but NO suitable alternative accommodation for the Scout Group was found.)</p> <p>The Scouts offer a vital Youth Facility to their locality, and replacement of their HQ with a small number of houses, compared to the overall numbers in the Local Plan, seems to be against all the other principals of good development. At this rate there will be no Scout facilities available to any of the localities, leaving only those on the peripheries of the town.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
17		Other Comments	SP13		<p>Thank you for consulting The Hertfordshire Gardens Trust on this partial review</p> <p>We have the following comments on Policy SP13, The Historic Environment.</p> <ol style="list-style-type: none"> <li>1 Although Listed Buildings and Conservation Areas are included, there is no mention of Historic Parks and Landscapes in the Policy.</li> <li>2. There are no nationally designated parks and gardens in SBC area but there are sites of Local Historic Interest which should be accorded protection (appropriate with their status).</li> <li>3. HGT has identified and researched some of these and this project is ongoing. There are still significant features at Rooks Nest, Shepalbury and elsewhere.</li> <li>4. In addition there are some sites in neighbouring LPA for which Stevenage provides the setting, such as Chesfield Park and Knebworth Park. The setting of these heritage assets should also be safeguarded under Policy SP13.</li> <li>5. SBC does not appear to have a Local List of historic parks and gardens in its area, contrary to NPPF 198 and Historic England Advice, GPA1 and GPA3.2</li> </ol>	Maintaining a local list of heritage assets is not a mandatory requirement but the council does recognise that it is recommended. The council already maintains a local list of historic buildings and consideration should be given to affording the same protections to parks, gardens and landscapes of local importance. However, heritage policies currently fall beyond the scope of the partial review and update to the local plan. Accordingly, this issue will be marked for consideration as part of the full review of the local plan, which commences

						<p>next year.</p> <p>Actions:</p> <ol style="list-style-type: none"> <li>1. Consider preparation of a local list of historic parks and gardens as part of the full review of the local plan.</li> <li>2. Consider strengthening heritage policies as part of the full review of the local plan.</li> </ol>
18	1	Other Comments		Transport, Cycling	<p>Transport - I want this plan to reflect that the town has a most amazing network of cycleways but that through previous planning mistakes and omissions this has become disjointed in a few areas and the missing links need to be put in to encourage more use of the network. This is your opportunity to right that and make Stevenage famous once more for its amazing Cycling culture rather than (as it is at present) pointed at as the place that failed to make cycling accepted.</p>	<p>The council cannot revisit historic planning permissions through the local plan. However, Policy SP1 and SP6 latest revision ensures that adequate cycle links are incorporated where sites are redeveloped and where entirely new sites come forward for development.</p> <p>Actions:</p> <ol style="list-style-type: none"> <li>1. Review existing policies to ensure that adequate provision is made for the cycle network.</li> </ol>
28		Other Comments	HO1/13	Housing site allocation	<p>It is no different to what they did to the 7th Stevenage group they gave it to a playgroup and they had to move to another area which would not work the 5th scout group has had to move for flats and house this town is no good anymore for young people no one is safe from having to have a group moved</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not</p>



						be permitted. The facility is protected under this and other local plan policies.
29		Other Comments	HO1/13	Housing site allocation	<p>Objection to HO1/13 the development of 18 homes on Chells Scout hut land Drakes Drive.</p> <p>I wish to strongly object to the above housing development.</p> <p>The Chells Scout Group is the largest in Stevenage with over 100 young members of all age groups, social areas and abilities, at its core consisting of Beavers (2 Colonies), Cubs (2 Packs) and Scouts (2 Troops) from a very wide catchment area, the hut is also used by Brownies, community clubs e.g. Dog clubs, Dance Schools and those wishing to hold functions (Funeral Receptions, Local bouncy castle business equipment maintenance, Birthdays and Family Gatherings) it is in use 5 days a week and most weekends. The Group is extremely widely respected for the quality of scouting it provides.</p> <p>The catchment area is growing with the large housing developments on Gresley way. The group therefore will undoubtedly expand with the increase in housing and will continue to provide a ready made purpose built facility for young people which will not be available within the new developments. The location is readily served by the SB1 Bus route, is readily accessible off Mobbsbury Way with good walking access.</p> <p>Keeping this facility for the hundreds of homes being built and the current estates far out ways the loss to the expanding community at the cost of the insignificant and tiny percentage gain of an additional 18 houses WITH the local and wider impact that would cause to both local areas and to Scouting as a whole across the Stevenage District.</p> <p>Scouting provides a large and diverse range of activities designed (covering all age and abilities) to develop the character and skills making a significant and large difference to the young people and providing opportunities not readily available elsewhere.</p> <p>The Chells Hut is purpose built with a hall, equipped kitchen, equipment storage facilities, car park and safe secure fenced outside area. This allows the group to be totally flexible in running programmes at any time, allowing rapid change if necessary due to weather, leader availability etc. As such it allows for equipment to be retrieved direct from the store, tents to be dried, equipment maintained, and continuing projects to be safely stored on site. The hall is also used for Stevenage District Scout Events, leader meetings, indoor sleep overs.</p> <p>The outside area is used for camping, Cooking, Pioneering, games</p>	Actions: None.

					<p>other and outside activities including instruction, training, demonstration, practice in outside and camping skills, outside first aid, fires, nature and green education, fetes to name just a few, the list is endless. As previously stated, these are all within a secure and safe fenced area. These are in addition to the large range of indoor activities offered by and enabled with the provision of accessible equipment.</p> <p>The provision of these types of facilities and resources must be considered and provided for with any plan.</p> <p>Bob Wright 6 Burns Close Stevenage SG2 0JN</p>	
30		Other Comments	HO1/13	Housing site allocation	Doesn't matter what we say its already been decided we had the same thing happen in oakscross	

31		Other Comments	HO1/13	Housing site allocation	The scout hut provides so much for the local community. Many enjoyed their recent summer fair, showing how well supported it is. It would be terrible to remove this provision for our young people.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
32		Other Comments	HO1/13	Housing site allocation	We object the proposed plans to demolish the scout hut. It's an invaluable resource for children to access and seems to have a real communal feel to it. This was particularly evident at their recent fundraising event, which brought the wider community together.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
33		Other Comments	HO1/13	Housing site allocation	This is shocking development - surely rather than cut provision for young people the Council should be increasing provisions . However no matter how much people protest ,decisions have already been taken . Currently the new Labour Government have decided that homes will be built wherever despite local objections - one can only hope that if houses must be built on the land in question will be for social housing for local people .	

34	1	Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>Chells Scout Group is an asset to the local community. Both my children have been through scouts there and it has been a tremendous benefit to them. It develops character, confidence, skills and a social environment outside of school.</p> <p>It serves over 100 youth every week with a range of scouting groups. It is a fantastic facility that has its own parking (thus not creating more crowded parking on Drake's Drive) and the land at the back allows for camp fires, archery and other scouting activities. This is a real benefit to the young people attending.</p> <p>It is the second largest scout group in Stevenage; in terms of a community group serving the young people in Stevenage, Chells Scouts is a shining example.</p> <p>The hut and land are such an asset to local youth that far outweighs any benefit of building some extra homes. Drakes Drive is already crammed with parked cars. It doesn't make sense to build more homes and have more parked cars on a piece of land that is serving so many young people so well.</p> <p>The Scout hut is in a very accessible location being in Chells and within easy distance of Pin green and other nearby districts. It is very accessible to families.</p> <p>In terms of the council encouraging youth work in the town, I really commend Chells Scouts and oppose any plans to build homes on this site.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
35		Other Comments	HO1/13	Housing site allocation	<p>No to demolishing the Scouts Hut. Do you want Stevenage to become a ghost town with young people roaming the streets with nothing to do but cause trouble?</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
36		Other Comments	HO1/13	Housing site allocation	<p>Why does Stevenage Borough Council have such an obsession with 'stealing' away small pockets of land that are vital to the community. I understand houses are needed, but not at the expense of small, easily accessible areas where people play, walk dogs, or just generally enjoy the space, not to mention wildlife, flowers and insects etc!! But sadly I know, no matter how much opposition there is, it is just a formality to ask and the planning will be granted regardless. It's a really sad state of affairs. Aren't the big</p>	

					developments in North Road, Symmonds Green and Gresley Way enough? And when are you going to think about all the infrastructure? Stevenage will be gridlocked in 10 years.	
37		Other Comments	HO1/13	Housing site allocation	Reference H01/13: I strongly oppose the proposed development of residential homes on Drakes Drive, particularly the demolition of the Scout Hut, which serves as a vital community resource and supports the activities of local youth. The area already faces significant challenges with parking availability, and the construction of a new residential complex would exacerbate this issue, making parking virtually unattainable.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
38		Other Comments	HO1/13	Housing site allocation	Leave the Scot hut alone kids and family use this all the time we don't need anymore homes our gp surgery can't cope as it is..their are plenty of flats being built in the town centre the community needs this hut..	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
39	0	Other Comments	HO1/13	Housing site allocation	As a resident in drakes done for over 40 years, I object to this. The roads simply cannot cope with more parking and traffic. And you would be taking away a valuable community building.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not

						be permitted. The facility is protected under this and other local plan policies.
40		Other Comments	HO1/13	Housing site allocation	I very strongly object to this proposal!! Loose yet another community space - like they took away the Sea Cadet site a couple of years ago?? (This site is derelict & totally vandalised now) What will happen to Chells Scout hut - the same no doubt. This council cares nothing for the youth of this town - only interested in making money - nothing else. Apart from which - what about the infrastructure to support these new houses etc? Current infrastructure can't cope as it is. Who are they building these houses for? Illegal ***** no doubt - certainly not our own people! This scout hut must not be lost - want the kids roaming the streets taking drink & ***** etc, getting involved with gangs - knives, fire arms & similar violence? This will be the result of destroying yet another community space.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
41	1	Other Comments	HO1/13	Housing site allocation	I strongly object to the proposal. As a local resident we already have issues with parking particularly at that end of the road where it narrows, building 18 new dwellings will only exacerbate this. Also where will the local children go to attend scouts etc? Having affordable opportunities for children to attend clubs are so important. This is an ill thought out proposal with little or no consideration given to the local residents.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
42		Other Comments	HO1/13	Housing site allocation	I object to the proposal, yet another community building away. Bradbury End loses community centre with a promise of a new one, now that is being completely ignored. Stevenage's history is built around community hubs for local people, this is being destroyed, with no thought for Stevenage youth.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility

						is protected under this and other local plan policies.
43		Other Comments	HO1/13	Housing site allocation	Drakes drive and the infrastructure supporting this plot do not allow for any more houses or vehicles!!	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies. <b>TOM ADD IN COMMENT ABOUT PARKING</b>
44		Other Comments	HO1/13	Housing site allocation	I object to the proposal of demolishing the Checks Scout Hut and replacing it with residential housing. Myself and my partner attended the Chells fete recently, led by Scouts themselves, and the children's ingenuity brought a resounding sense of community that is hard to come by nowadays.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
45		Other Comments	HO1/13	Housing site allocation	Our growing children need this!	
46		Other Comments	HO1/13	Housing site allocation	This is getting ridiculous in Stevenage every tiny bit of space is getting taken over by "hones" mainly flats. This has been part of the community for years and is just not in keeping with the area. I whole heartedly oppose this	

47	0	Other Comments	HO1/13	Housing site allocation	I do not agree with the proposal for 18 houses as there is insufficient activities for young people and removing the scout hut and facilities will be a detrimental step backwards. Also parking in the area is a major concern with additional traffic mean the development is totally unsuitable and the application rejected and	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
48	1	Other Comments	HO1/13	Housing site allocation	Stevenage new town was specifically designed to include open and social spaces, to enhance "quality of life" for residents. While there is pressure to build housing, it should not and must not be to the detriment of local social facilities and local social spaces . If "The heart of a town lies in its people" , has any substantive meaning, and not just a byline, then this development and others which chip away at the founding fabric of Stevenage, should be refused.	
49		Other Comments	HO1/13	Housing site allocation	I am objecting to the proposal to demolish the Scout Hut in Drakes Drive for the erection of 18 houses. Since a child myself back in the 1970s, the Scout Hut has been used not only by the Scouting association but also as a Sunday School and Dancing Academy as well as many other clubs and parties. All of these not only provide children the opportunity to learn new physical and life skills which can help them in the future, they provide a safe place away from the stresses and troubles of life and help them to have good mental health, something which is desperately needed in this post COVID age. To remove such an important facility for the sake of a mere 18 houses (new abodes for approx 36 children if the 2.4 rule is followed) to the detriment of 100s is nonsensical. Our children need safe places to learn to grow into happy healthy adults, taking away these facilities will only add to miserable childhoods and poor mental health. I urge you to reconsider and think of the impact the loss of this building would have on the community.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
50		Other Comments	HO1/13	Housing site allocation	I strongly oppose the proposed development to replace the scout hut on Drakes drive with residential properties. The scout hut is an important resource for the scouting community and the hut allows for camps and groups throughout the week.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut



						is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
51		Other Comments	HO1/13	Housing site allocation	Reference H01/13. I strongly oppose the demolition of the scouts hut especially with the replacement of 18 new homes. Firstly, the traffic and congestion in Drakes Drive makes driving very difficult and is not safe during school time. The construction of 18 homes would only negatively contribute to this further. Secondly, taking away a local resource for children that helps build core life skills, offers an escape from a difficult world and provide a healthy social environment for the betterment of their mental health just to make a few extra quid for either the council or private landlords is appalling. There are lots of other areas to build on that would not be such a detriment to a local community. Please reconsider the demolition of the scouts hut.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
52	1	Other Comments	HO1/13	Housing site allocation	Strongly object- taking away yet another part of a community amenity	
53		Other Comments	HO1/13	Housing site allocation	Where would people that live in these 18 residential homes park, yet again taking away something that our children use and somewhere they've been able to gather! Bad idea	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
54		Other Comments	HO1/13	Housing site allocation	I would object to the loss of an important community facility without an alternative suitable site being offered.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut

						is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
55	0	Other Comments	HO1/13	Housing site allocation	<p>Regarding (HO1/13) for 18 homes to be built on this land. I strongly oppose this plan which will deny the community of a longstanding resource that has contributed to the lives of local young people and families for over 40 years. Yes people need homes but this is more about profit over purpose. In order to tackle our social issues of anti social behaviour, unemployment, people living in poverty, to name but a few, a community hall such as this is essential and invaluable. Scouting is a voluntary and inclusive organisation which have supported children and young people to develop and grow into wonderfully functioning humans that contribute greatly to our society, taking part in activities that get them out to appreciate our wonderful outdoors.</p> <p>In addition, The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space. The Scout HQ is easy to access, only just off Mobbsbury Way The Scout HQ is close to a bus route (SB1) The Scout HQ has storage space for camping and activity equipment The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there. 18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week. Drying tents post camp! Collecting/preparing equipment ready for sleep overs and camps Weekend activities " camps, sleepovers Has an equipped kitchen, used by hall users and supervised children It has its own car park.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
56		Other Comments	HO1/13	Housing site allocation	to promote the use of electric bicycles, SBC could (maybe in partnership with commercial entity) provide secure, card/ phone access storage for expensive electric bicycles at strategic locations. This could be a paid for service.	
57		Other Comments	HO1/13	Housing site allocation	Pls don't do this	

58		Other Comments	HO1/13	Housing site allocation	I strongly oppose the development on the scout but land. The parking is already terrible and the road is very congested	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
59		Other Comments	HO1/13	Housing site allocation	I strongly oppose HO1/13 the proposal to replace Chells Scout Hut with 18 residential homes. The Scout Hut is an invaluable resource which is used on most nights and also week-ends providing a safe environment for all who use it. My son is one of the hundreds who have enjoyed and benefited from the numerous skills taught at the Scout hut when he was a Cub Scout and a Scout and the good work is still going on thanks to the dedicated volunteers. Where are the young people of Chells supposed to go if this half baked plan goes through? Please Stevenage Council think long and hard about the consequences of this plan and REJECT it.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
60		Other Comments	HO1/13	Housing site allocation	This should not go ahead taking away from the youth and families in the area/community	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

61		Other Comments	HO1/13	Housing site allocation	<p>There is not enough things for children to do, let alone to take away another facility, what is going on!  The area you are proposing to build 18 residential homes would cause trouble no end with the amount of traffic and the small rd it would be a total nightmare!!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
62		Other Comments	HO1/13	Housing site allocation	<p>18 homes can't replace valuable skills hundreds of children learn at scouts. Please build them somewhere else and leave our scouts hut and personal to what they doing best. Thank you</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
63		Other Comments	HO1/13	Housing site allocation	<p>I strongly oppose the planned development on Drakes Drive H01/13. The space is not suitable for 18 houses and the infrastructure on Drakes Drive cannot support it. There is no parking available currently, and large vehicles struggle to get around blind bends due to the number of cars that have to park on the road. Additionally, the Scout Hut provides a much loved and needed service to the local community, helping children learn valuable life skills. The proposal will be removing opportunities for growth and development, surely we should be prioritising community spirit and the future of the next generation? There are many available and unused spaces in and around Stevenage which would be more suitable for new housing, but Drakes Drive is NOT it!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

64	0	Other Comments	HO1/13	Housing site allocation	<p>With regards to Ref H01/13 - I oppose the building of new homes and the demolition of the scout hut.</p> <p>There is not enough room for 4 houses never mind 18, the area is already high traffic and parking is non existant. The environmental disruption alone will heavilythere are local wildlife, foxes and other animals that reside in the area and the destruction of their habit will be detrimental.</p> <p>We are constantly told there is nothing for kids to do and you want to remove this, this is an appalling proposition and one that I am suprised that a labour council are trying to push through as it reeks of conservative values of the rich getting richer!</p> <p>Support the community and stop building on areas we need. If there is a desperate need to build houses, build elsewhere, local housing built already in the area at the site of the former MG Garage has still not been completed and lie vacant. This is a waste of time, money and just will reduce Stevenage into a deprived area.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
65		Other Comments	HO1/13	Housing site allocation	<p>Against</p> <p>As a town we state that we are about giving chances to the next generation. By removing places like this scout hut, we are only limiting our children's and Stevenages future generations in experiencing different activities and socialising in a positive way.</p> <p>Keep the Scout, invest in more clubs and groups and classes for all.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
66		Other Comments	HO1/13	Housing site allocation	<p>Save the hut!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

67		Other Comments	HO1/13	Housing site allocation	Please don't take away the scout hut. It's a vital part of the community.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
68		Other Comments	HO1/13	Housing site allocation	<p>With reference to the councils local plan, entry H01/13, I object to the building of these 18 homes that would replace the current facilities.</p> <p>The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility.</p> <p>Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities.</p> <p>18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.</p> <p>We cannot afford to lose another important youth facility for the sake of a few houses.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
69		Other Comments	HO1/13	Housing site allocation	I am fully opposed on demolishing the scout hut. It is an essential part to scouting and young children development in many skills to help them later in life. By replacing the scout hut, you will be taking away vital resources for these children and leaving them with nothing. Scouting is a charity, there is no excuse for demolishing the hut.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

70		Other Comments	HO1/13	Housing site allocation	I would prefer for the scout hut but not to be removed and replaced with 18 homes! The impact with just the sheer number of additional cars on what is already a busy road, will make things tougher than they already are. The scout hut provides something for the area beyond quickly erected, cheap homes.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
71		Other Comments	HO1/13	Housing site allocation	Happy to build homes but not childhoodsðŸ™,~	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
72		Other Comments	HO1/13	Housing site allocation	You can not take away a scout hut just to make profit from making more homes. The children need somewhere in the community to be able to be safe and enjoy clubs.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

73		Other Comments	HO1/13	Housing site allocation	Just ruining childrens imagination, communication skills and freedom. Stop taking everything away from the Community and the children.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
74		Other Comments	HO1/13	Housing site allocation	I strongly oppose. Yet again another vital part of the community being taken away.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
75		Other Comments	HO1/13	Housing site allocation	We need the hut, the kids need somewhere to go to be off the streets, this is invaluable place for them to learn and spend time, develop. You can't take it away from our kids and build yet more flats. Leave the age space for the kids to enjoy the childhood and learn.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.



76		Other Comments	HO1/13	Housing site allocation	<p>H014/13 I oppose the building of 18 dwellings on drakes drive. The plot is well utilised by the cubs and scouts and has been the heart of the community there for many years. The parking in drakes drive is absolutely awful as it is: more dwellings will mean even more cars. We've already lost the sea scouts in fairlands- how many more of these important clubs for children and the community do we need to lose? The very clubs that keep young people engaged and pro social, instead of being bored and potentially falling into the antisocial behaviour that the council say they are trying to prevent? Please reconsider this decision.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
77		Other Comments	HO1/13	Housing site allocation	<p>Please please do not close the scout hut!, we have already listed the play schemes in Stevenage which were a vital part of our community and resources for children, The Scout hut and its leaders are a pinnacle of the community. Losing the scout hut and gir houses will not achieve anything?... where &amp; what will the children of our communities do without these vital groups and clubs that are held there?...instead find some investment for the children in this town &amp; our communities!, so much infrastructure and no where for the growing families for these children to go. All the work that the volunteers of the scout &amp; cub leaders is second to none and give the children amazing fun times education and opportunities that are enriching our children's lives.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
78		Other Comments	HO1/13	Housing site allocation	<p>How does closing the scout hut serve our community. Quite simply, it doesn't. This is a truly awful idea. SBC seem determined to take resources and facilities from young people and this is another example.</p> <p>Leave the scout hut alone</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

79		Other Comments	HO1/13	Housing site allocation	There are so many other places to build houses. The scouts need their hut to keep their community spirit going.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
80		Other Comments	HO1/13	Housing site allocation	Leave our scout hut alone the children in Stevenage have very little escape from everyday pressures H01/13	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
81		Other Comments	HO1/13	Housing site allocation	H014/13 Closing the scout hut is a very bad idea. What will happen to the groups that meet there? There have been thousands of children that have met there within Scouting and Guiding.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

82		Other Comments	HO1/13	Housing site allocation	<p>I strongly oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. Hundreds of youngsters use the Scout HQ every week, giving them a safe space for learning essential life skills outside of school hours. Our Scout hut, a cornerstone of our community for many years. The outdoor space is just as invaluable as it is used for various activities for all young people. This space recently hosted a Summer Family Fun Day that was open to all members of the public which was even attended by the MP for Stevenage, Kevin Bonavia, so it is clear just how important this community hub is for Stevenage. Demolishing the building for 18 units of housing to be crammed into already developed area will show no benefit to the local area. Drakes drive is a narrow road, and close by we have Nobel School, where on weekdays parents park to drop off and collect their children, causing heavy congestion, this will further impact the safety of traffic and will suffer the pressures of overdevelopment. There are zero plans in place to manage the loss of such an important space. How can a "community facility be reprovided" once you have built on the very land it belongs in or "its loss satisfactorily justified" when it is clear the loss simply cannot be justified. A substandard process has been used to identify this area to be unnecessarily developed with great cost to the local area. This change would not only strip away a vital community resource but also affect the growth and development opportunities for our young Scouts. The council needs to look in a mirror and think about the motto of Stevenage, "The Heart Of A Town Lies In Its People". How can the town have a heart if its people</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
83		Other Comments	HO1/13	Housing site allocation	<p>I object to the plan of 18 dwellings on drakes drive the parking is bad enough and the scout hq is great for our community the young people need these places</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

84		Other Comments	HO1/13	Housing site allocation	<p>Why on earth would SBC want to take away a building that serves the community so well especially the children in this community and replace it with 18 poky houses? The local children in Chells love attending scouts and all the activities that they provide including essential life skills.</p> <p>Living near to the scout hut I listen to children having an amazing time every week and to take that away would be disastrous for the local community not to mention the impact on wildlife that also live in there - we have beautiful foxes, bats and hedgehogs that all visit and it would all be destroyed.</p> <p>There is no parking on the streets already in drakes drive and cook road so to take away yet more parking would be detrimental to the houses that already struggle every day to park and would cause unrest in these busy roads.</p> <p>I purchased my house many years ago and one of the reasons that I did so was that my house was not overlooked. If SBC build these clearly unnecessary houses then my house and garden would clearly suffer from this negative impact.</p> <p>I 100% strongly oppose the bulding of these houses</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
85		Other Comments	HO1/13	Housing site allocation	<p>We need to keep our scout hall as it's part of our community &amp; somewhere for our young people to learn life skills.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
86		Other Comments	HO1/13	Housing site allocation	<p>I think itâ€™s absolutely ridiculous to think there may be 18 more new homes on drakes drive. It is beyond frustrating to drive down that end of the road already, and the parking is awful! Aside from all that, the thought of losing our scout hut which has been there for years and is such an invaluable place for our young children. Instead they will just learn that places that have meaning and where they learn and play, can quickly be demolished to make room for more rabbit hutches! Please stop this from happening.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this</p>

						and other local plan policies.
87		Other Comments	HO1/13	Housing site allocation	I am AGAINST THIS PROPOSAL! This is a terrible idea to build another block of flats instead of such a valuable scouts hut, which brings so much fun and development to our children. It's such a joy to watch our kids thrive and have so much joy and you want to take it away from local residents by bringing more cars, noise and pollution, as scouts back garden and trees will also be destroyed. Is that in line with Stevenage Go Green by 2030 strategy? Clearly not!!!! We need to raise more awareness with local residents in order to protect our Scouts hut, which is very well looked after and maintained!	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
88		Other Comments	HO1/13	Housing site allocation	I oppose the demolition of Chells Scout hut on Drakes Drive to make way for residential housing. The Scout Group is not only a resource for the town, it is part of Chells community and an important contribution to the well being of youngster in our area. To take that away would be unforgivable. Please consider available brown field sites before stripping our community of a valued resource.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
89	1	Other Comments	HO1/13	Housing site allocation	Why are you selling our community's amenities? Are our kids not allowed anything? This is how you kill communities not create them. It feels very much like profiteering at the expense of people who live here.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility

						is protected under this and other local plan policies.
90		Other Comments	HO1/13	Housing site allocation	I oppose the building of houses on drakes drive ref H01/13. Another plan to shoe horn houses into an already dense area of housing, also into an area already in use by the community. Do not agree to the plan. It would be different if it was an unused vacant plot. Parking is already a nightmare along the road , it will only make things worse. There are other unused areas that would be best placed to receive housing. We shouldn't be losing another community plot	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
91		Other Comments	HO1/13	Housing site allocation	We don't want 18 housing bad enough having no where to park now, keep the scout hut it's been there years and is used all the time	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
92		Other Comments	HO1/13	Housing site allocation	I oppose the building of 18 houses on drakes drive. The scout hut is invaluable to the community. The new houses will increase issues with parking and traffic congestion.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility

						is protected under this and other local plan policies.
93		Other Comments	HO1/13	Housing site allocation	I don't want no more houses built there, the scouts help lots of children, with learning life skills	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
94		Other Comments	HO1/13	Housing site allocation	No more houses. Greedy developers Been a Kids scout hall for years .	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
95		Other Comments	HO1/13	Housing site allocation	I am against more houses in Drakes Drive due to parking and the congestion on school days.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility

						is protected under this and other local plan policies.
96		Other Comments	HO1/13	Housing site allocation	No ! by tearing down the vital assets our town needs your are turning Stevenage into an over crowded getto. You wouldnt approve this development if it was next to your houses so why do you think its ok to build next to ours ?	
97	1	Other Comments	HO1/13	Housing site allocation	I oppose the proposed development for the replacement of Chells scout hut with housing. This is a vital part of local children's development. My own children attend Brownies at this site as have many hundreds of children in the past. The closure of the remaining play centre means there are minimal options for children to socialise and learn in safe spaces. This is a key development in the Chells area. Hundreds of homes are being built less than a mile away off Gresley Way. This proposed development would also seem overtly excessive for an area of town designed with integral green spaces for residents of all ages to utilise. As per recent plans to build houses on open green space opposite Mobbsbury shops that walls rejected this surely has grounds for a similar rejection if not more so due to its importance to the youth of the town.  A heart of a town lies in it people	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
98		Other Comments	HO1/13	Housing site allocation	18s new houses is ridiculous. There is no parking down Drakes Drive as it is. Already newish built flats opposite. Not enough space to even fit 18 houses on! Not only is the scout hut vital for our community, so much greener will be demolished! Reference H01/13	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
99		Other Comments	HO1/13	Housing site allocation	We do not want 18 houses on Drakes Drive leave the scout hut there, we have trouble parking as it is without building loads of houses	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can



						be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
100	0	Other Comments	HO1/13	Housing site allocation	I object to the proposal of HO1/13. The plot of land is not big enough for 18 residential houses to be build. The road is already compacted with cars and the road is too narrow to accommodate anymore.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
102		Other Comments	HO1/13	Housing site allocation	I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.  This local facility is vital to our community. My boys have both attended the scouting groups over the years and more recently I have used the hut and grounds for my dog training classes.  The hut used five evenings a week and at the weekends. It is ideally situated in the heart of a busy area near schools and conveniently located on the SB1 bus route and also has its own private car park for users. 18 homes on this land will not make a significant impact in housing in the area, the loss of this facility will be much greater to the community! The scouting group is the second largest in Stevenage!	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
103		Other Comments	HO1/13	Housing site allocation	I strongly oppose these plans. This Council don't seem to care at all about the welfare or mental health of the young members of our community! This cub hut is an incredible asset - so sad to hear you want to sell off yet more land whilst refusing to invest in children's welfare or safety!	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut

						is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
106	0	Other Comments	HO1/13	Housing site allocation	<p>I would like my objection recorded against your proposal to build 18 houses on the land currently occupied by the Chells Scouts on Drakes Drive.</p> <p>Having already provided many generations of young people with activity, drive, purpose and self-confidence, the Chells Scouts are one of the few financially accessible activities for the young people of this deprived area of this town.</p> <p>The building of new homes in Stevenage should not be at the cost of the provision of youth community and motivation. The Scouts belongs to a long standing tradition of which Stevenage should be encouraging and supporting.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
108		Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. The Scouts Hut has been a long standing pillar to the community providing a superbly accessible community service. With the extensive housing developments already under way in Stevenage, the existing scouts hut has the facilities to provide their continued service to the new community. Moving it to less well equiped buildings would risk diminishing the outstanding quality of service offered.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

109		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>It will be a loss of an important recourse for the local youth and wider community because</p> <p>Â· The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility</p> <p>Â· Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities</p> <p>It has been/is used by dance schools, dog clubs, other Scout Groups, Stevenage District Scouts, church groups, funeral receptions, Brownies, Guides, Explorer Scouts and local bouncy castle business.</p> <p>To replace with such a small number of homes in a back drop of thousands and loose a well established and loved community resource when youth activities are at an all time low is complete madness.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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110	0	Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>Chells Scout HQ is in the heart of the local community it serves, conveniently accessed by the many young people who walk safely to and from the location situated just off Mobbsbury Way. We live within a close walk of the location, reducing the need to drive for drop offs and pickups.</p> <p>As a family we have all shared and continue to share great experiences of this valuable locally based community resource. Many of the parents and leaders have contributed towards the maintenance and upkeep of the site. Both of my children continue to attend as Cubs and Scouts on a weekly basis, with the experiences and opportunities enriching their personal social development.</p> <p>Chells Scout HQ is in use 5 evenings a week and most weekends, a popular valued well used community facility, allowing the provision of locally based affordable scouting at minimal costs being inclusive to all. The building is additionally used at other times for general administration meetings, AGMs, Parent/Guardian briefings, Leaderâ€™s meetings, Executive Committee meetings, Scouting planning meetings. Chells Scout HQ has been and continues to be used on occasion by dance schools, dog clubs, other Scout Groups, Stevenage District Scouts, church groups, funeral receptions, Brownies, Guides, Explorer Scouts, the loss of this facility would be detrimental to the local community.</p> <p>Chells Scout Group is the largest locally well attended Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, the facilities that the Scout HQ provide positively help achieve this provision for young people from the local community.</p> <p>Well in excess of 100 local community young people use their Scout HQ every week, providing them with the opportunity of constructive and supervised activities, not bound with limited time constraints or demands unlike other venues.</p> <p>Chells Scout HQ is served by the SB1 bus route making it accessible for users travelling by public transport, this route also provides a vital link between the HQ and the Stevenage Railway Station used for excursions into London and surrounding areas.</p> <p>Our Scout HQ has a dedicated car park onsite, which provides safe and secure drop off for users with mobility and access requirements. The main building provides an ideal size space of a vaulted ceiling meeting hall, with dedicated notice boards, permanent display of the Scouting logos, trophy display cabinet for the display of the groups achievements, inside flag pole. A secure</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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111		Other Comments	HO1/13	Housing site allocation	<p>To Whom It May Concern,</p> <p>I am writing to formally object to the proposed demolition of the Chells Scout Hut and the subsequent construction of new houses. The Chells Scout Hut is an invaluable community asset that plays a crucial role in the development and well-being of our local youth. Here are the key points that underscore the importance of preserving this facility:</p> <ol style="list-style-type: none"> <li>1. High Utilization Rate: The Scout HQ is used five evenings a week and most weekends, serving as a popular and highly utilized facility within our community.</li> <li>2. Benefiting Over 100 Youngsters Weekly: More than 100 youngsters engage in constructive and supervised activities at the Scout HQ every week, which helps them grow and develop personally.</li> <li>3. Safe and Secure Outdoor Activities: The field associated with the Scout HQ is used for various activities, including camping, games, fire lighting &amp; cooking, archery, and night sky observation. These activities provide a safe and secure environment for children to explore and learn.</li> <li>4. Convenient Access: The Scout HQ is conveniently located just off Mobbsbury Way, making it easily accessible to the community.</li> <li>5. Proximity to Public Transport: The HQ is close to a bus route (SB1), making it reachable for those who rely on public transportation.</li> <li>6. Storage for Essential Equipment: The facility has ample storage space for camping and activity equipment, which is essential for the Scouts' activities.</li> <li>7. Largest Scout Group in Stevenage: The Chells Scout Group is the largest in Stevenage, with 2 Beaver Scout Colonies, 2 Cub Scout Packs, and 2 Scout Troops. This extensive participation is a direct result of the excellent facilities available at the HQ.</li> <li>8. Insignificance of New Housing Contribution: The construction of 18 homes out of the thousands being built in the area is an insignificant contribution. In contrast, the positive impact of the Chells Scout HQ on hundreds of children each week is substantial and irreplaceable.</li> <li>9. Post-Camp Activities: The HQ is essential for activities like drying tents post-camp and preparing equipment for sleepovers and camps, which are integral parts of the scouting experience.</li> </ol>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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114		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The Scout HQ is frequently used for scouting activities and by other community services, Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities. Being in the location, it is easy to access by car and public transport.</p> <p>The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there, which my children have and currently attend.</p> <p>18 homes out of the thousands being built is an insignificant number and would impact so many young lives. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week. The hut and fenced area provides a safe and protected area for our children. It has been/is used by dance schools, dog clubs, other Scout Groups, Stevenage District Scouts, church groups, funeral receptions, Brownies, Guides, Explorer Scouts, local bouncy castle business. Also used for weekend activities including " camping, sleepovers, fetes, camp fires, Scouting activities, equipment maintenance</p> <p>It is used for leader meetings, planning meetings and exec committee meetings.</p> <p>It's a great size hall for the activities we do, including games, cooking, pioneering, training.</p> <p>This will be such a disappointment should you choose to close more services that build strong, (physically and mentally) and confident children.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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115		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The Scout HQ is frequently used for scouting activities and by other community services, Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities. Being in the location, it is easy to access by car and public transport.</p> <p>The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there, which my children have and currently attend.</p> <p>18 homes out of the thousands being built is an insignificant number and would impact so many young lives. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week. The hut and fenced area provides a safe and protected area for our children. It has been/is used by dance schools, dog clubs, other Scout Groups, Stevenage District Scouts, church groups, funeral receptions, Brownies, Guides, Explorer Scouts, local bouncy castle business. Also used for weekend activities including“ camping, sleepovers, fetes, camp fires, Scouting activities, equipment maintenance</p> <p>It is used for leader meetings, planning meetings and exec committee meetings.</p> <p>It's a great size hall for the activities we do, including games, cooking, pioneering, training.</p> <p>This will be such a disappointment should you choose to close more services that build strong, (physically and mentally) and confident children.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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116	2	Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. The scout hut is a very well used community facility used 5 nights a week along with most weekends. Having an out door space as well as a hut allows the children to participate in many new activities including games, campfires, cooking and archery in a safe and secure area. The scouting group have lots of equipment there for their activities giving children the opportunity to try so many enjoyable activities at minimal cost to their families. Having their own hut means scouting is one of the most affordable clubs locally (I'd hate to think what would happen if we had to hire somewhere to try meet - this could make costs unachievable to so many families and therefore deprive so many children in gaining new skills and enjoying belonging to a local group). My children have benefited enormously through the scout group following the path from beaver, to cubs and on to scouts. They love the camps held at the hut and have gained confidence to stay away from home at somewhere still familiar and then to go on and join in with longer weekend camps where they have learned many new skills and tried so many new activities. The recent chells group fete was so well attended by not only scouting families but other local families who came and enjoyed the day. It was notable how popular the campfire cooking activities allowing children to come and 'have a go' were. Without the hut and the outdoor space we wouldn't be able to do this. I really hope this facilities are acknowledged for how valuable they are to the wider community and the potential we have to continue to grow and provide these opportunities for local children if the threat of development isn't hanging over the hut and grounds. It should not be lost to housing and we should be celebrating having a community facility and all it provides.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
117	1	Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. It's a great place where I have seen my son learning, socializing and discipline for himself and the community. My friends inspired by my son's love to scouting also send their kids to scouts hub. I have also registered my little one who will be starting soon.</p> <p>Of all the other extra curriculum activities, Scouting teaches being oneself, , discipline and above all love to community and respect humanity and all living beings.</p> <p>Moreover, the hub is centrally located, accessible, safe locality. Area development should not be done at the cost of and risk to the community and local residents who would loose something more in broader view.</p> <p>Please reconsider the plan and keep the Scout hub safe</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

118	1	Other Comments	HO1/13	Housing site allocation	<p>The proposal to demolish the Chells Scout HQ to build new houses in Stevenage overlooks the significant impact this facility has on the local community, especially for children. The Scout HQ is an indispensable venue used by over 100 young people weekly, offering constructive and supervised activities that deter crime and provide unique opportunities for personal development. My child, like many others, thoroughly enjoys participating in these activities, and we regularly walk there due to its convenient location just off Mobbsbury Way, near the SB1 bus route. This vibrant center operates five evenings a week and most weekends, hosting a range of activities such as camping, games, archery, and astronomy in a safe environment. The HQ, which includes essential amenities like storage for equipment, a kitchen, and a car park, is the heart of the largest Scout group in Stevenage, featuring multiple Beaver, Cub, and Scout units. Given the already limited recreational options for children in this part of Stevenage, the loss of such a facility would be detrimental. Constructing just 18 new homes is an insignificant contribution compared to the immense value the Scout HQ brings by enriching the lives of children and fostering a community spirit.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
119	2	Other Comments	HO1/13	Housing site allocation	<p>Totally object to this proposal. It is dangerous. There is not enough space for these buildings. The road is narrow and as of today dangerous and hard to navigate. The good the scouting community brings to Stevenage youngsters will be lost and then you have to deal with anti social behaviour. Please think about the bigger picture before you build!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

120	1	Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>Anti-social behaviour is a problem so it is beyond belief that the council wants develop on yet another Scout premises, the home of a well-established and vibrant Scout group. Chells Scouts is an incredibly popular and well-used Scout group, the largest in Stevenage - it is used every weekday evening and most weekends and has two Beaver Scout Colonies, two Cub Scout Packs and two Scout Troops.</p> <p>They need the hut and outdoor space for the children's activities and to house all the equipment for activities such as camping, cooking, tools, space to dry tents etc. - it is a wonderful group run by amazing, enthusiastic volunteers who give so much of their time and effort for the community. It is in a great position for families to walk to - we were able to easily walk or cycle from Poplars.</p> <p>The Remembrance Parade and St George's Day Parade are always encouraged and well attended. Chells Scouts provide wonderful opportunities for young people - including making friends, acquiring skills such as fire lighting, cooking, archery, learning discipline, resilience and confidence and at an affordable price too.</p> <p>Both my children went to Chells Scouts and my daughter got so much from Scouting, she volunteers. It was also at Chells that she had the opportunity to try target shooting and was able to join the Stevenage Scouts Shooting Club (which used to be housed at the hut by Fairlands that the council has already taken for development). She would never have had this opportunity outside of Chells Scouts and she has competed at national and international level, this year becoming British Champion in the Sporter Air Rifle category. Her confidence soared.</p> <p>I would also add that the benefits of being in Scouting was very helpful for her University application/personal statement.</p> <p>The council will continue to build more houses and flats but why remove this incredible facility for just 18 houses? Stevenage Council should celebrate its Scout groups and the wholly positive effect they have on young people's lives, not make it harder for them to operate.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
121		Other Comments	HO1/13	Housing site allocation	<p>You are spoiling the fun of over a hundred young people. My disabled daughter-in-law is able to walk to the site so obviously finds it very convenient. Where are you arranging to allocate the Scout HQ, all this just for the sake of 18 homes. What is the thinking of Stevenage Borough Council.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can</p>

						be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
122		Other Comments	HO1/13	Housing site allocation	I would like to please object to the planning permission for Chells Scout HQ being changed to build houses. Is it possible you can please confirm the procedure for me to formally reject or object to this change of land use?	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
123	1	Other Comments	HO1/13	Housing site allocation	I am writing to you to say I oppose for H01/13. Scouting and other youth groups over a space for young people to explore a multitude of activities they may not be able to experience due to situations at home. It also allows people to volunteer in their local communities to give back and support where they can. Whilst new homes are needed, to remove this scout hut will do significant damage to the community and the scouting in the area as a whole. I urge you to reconsider the proposal of houses on this site whole heartedly, seeing the little ones' faces light up during a scouting meeting is amazing. Hearing of all the friendships they have created from the camps and other activities that happen on this site are ones they will cherish for life.	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

124	1	Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>This is a vital and well used community resource. It's the headquarters of the largest Scout Group in Stevenage and has been at the heart of this community for a very long time. The hut is currently also used by the Brownies, a dog club, private hire for birthday parties and historically has also been used for dance classes.</p> <p>The facilities are amazing and the group fully use the building and it's accompanying outdoor space. The Scout Association promote outdoor activities and expect groups to spend a lot of time outdoors. This site allows the group to do so with space to camp, cook, do archery and enjoy other activities in a safely enclosed space. Having a purpose built building allows storage of equipment and somewhere to dry the tents after a wet camp!</p> <p>The building is well situated in the heart of Chells and is just off the bus route. It is of benefit environmentally that many of the leaders and members are able to walk or use public transport to access the facilities.</p> <p>This building and the groups that meet there provide the young people a safe space to be and encourages their confidence and personal development.</p> <p>A small development of 18 houses will not make much of a dent in the need for housing but it will make a huge dent in the community - affecting not just the young people that use the facilities, but their extended families and the local community.</p> <p>It is vital we keep the hut at Drakes Drive - Scouting really does impact and improve people's lives. Please take a moment and reflect on whether you were involved in scouting or know someone who was and ask them to think back to that time. The scout hut is a vital part of the scouting experience and this hut needs to stay where it is!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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125		Other Comments	HO1/13	Housing site allocation	<p>To whom it may concern, I am writing to you to say I oppose for HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The reason for why I oppose is because 18 homes out of the thousands being built is an insignificant number and the Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility. Not only is this hut in use 5 days a week, over 100 youngsters use the hut every week giving them constructive and supervised activities at the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.</p> <p>The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week. For example The HQ allows us to Collect/prepare equipment ready for sleep overs and camps and has an equipped kitchen, the kitchen is used by hall users and supervised children so they can learn to cook and to learn the health and safety while working around the kitchen. Without this vital part we would not be able to prepare food and run weekend activities - camps, sleepovers etc.</p> <p>The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space while having a place in the HQ to store space for camping and activity equipment.</p> <p>Without the car park which we are greatly appreciated to have we would not be able to use this so the youngsters can drop off or pickup their equipment for the camp ahead whether that's a camp at the hut or a camp in Wales, meanwhile the car park is a safe space where they can get dropped off or picked up from after being supervised to learn the skills they need.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
126		Other Comments	HO1/13	Housing site allocation	<p>I am writing to strongly object to the building of 18 houses in drakes drive on the land that currently houses the scouts hut. Where I understand the need to build houses this shouldn't be at the detriment of our children and young people in Stevenage. It is an amazing facility for the children which provides great activities for them and builds on their independence resilience skills and discipline. My grandson attends the beavers here and it is amazing that they have a small piece of land that facilitates their activities safely. I recently attended a fate which also invited in the community it was a great success! We must not take away long established facilities for our children we should be building on them and using them as a model for more. Can I also say it is an already busy and crowded street that doesn't need 18 more houses and cars!</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

127		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility.</p> <p>Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities.</p> <p>The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space.</p> <p>The Scout HQ is easy to access, only just off Mobbsbury Way.</p> <p>The Scout HQ is close to a bus route (SB1).</p> <p>The Scout HQ has storage space for camping and activity equipment.</p> <p>The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.</p> <p>18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.</p> <p>Drying tents post camp!</p> <p>Collecting/preparing equipment ready for sleep overs and camps.</p> <p>Weekend activities " camps, sleepovers</p> <p>Has an equipped kitchen, used by hall users and supervised children</p> <p>It has its own car park which is convenient for me as we drive from a different part of Stevenage as Chells was recommended to us as the best group when we moved and they have not been wrong.</p> <p>Both my children (12 and 8) moved to Stevenage last year and both have ADHD, they have never found a safe place in clubs outside of school. They were very quickly accepted into Chells and it has been so beneficial to them and their mental health. They've made friends (something my 12 year old has struggled with) here before they did at school. They've both learnt useful life skills. My 8 year old has learnt so much from organised events here such as when he wrote his name in braille and they both know how to light a campfire. The community is fantastic and the community days are really special as</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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they take place at the hut which is the perfect space for them to do all the activities to cooking on a campfire to archery. You cannot destroy this wonderful service and community that changes lives of many, including vulnerable children just for 18 more homes in a plan where you are building thousands all over Stevenage.

128		Other Comments	HO1/13	Housing site allocation	<p>Scouting is Stevenage is one of the most positive and life changing activities for young people. The skills Children gain and the lessons they learn are some of the most important in life. At a time where children are more vulnerable than ever, scouting gives them a place to meet likeminded children they may not see at schools. Chells Scout HQ holds only positive benefits for the local area, to be taken down would not only limit yet another youth club (don't get me started on Play Centres being closed) but would limit Children's Skills for Life.</p> <p>5th Stevenage Air Scouts had their building taken away so this would make this the second time SBC have done this.</p> <p>You might want to take us down but we aren't going without a good fight</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
129		Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.  You can then add a few reasons why you oppose it " maybe in your own words/order/selection  The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility  Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities  The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space.  The Scout HQ is easy to access, only just off Mobbsbury Way  The Scout HQ is close to a bus route (SB1)  The Scout HQ has storage space for camping and activity equipment  The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.  18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.  Drying tents post camp!  Collecting/preparing equipment ready for sleep overs and camps  Weekend activities " camps, sleepovers  Has an equipped kitchen, used by hall users and supervised children  It has its own car park.  My 2 sons are both members of cubs and beavers, location at drakes drive makes it accessible by bike for us too</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

130		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>I was surprised when I was first directed to the hut as I was surprised it was so tucked away, however I quickly learnt what an incredible asset it is.</p> <p>The Scout HQ is one of the most- used and best equipped in the area. It is in use 5 evenings a week and most weekends, so a popular and used facility  Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities  The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space.  The Scout HQ is easy to access, only just off Mobbsbury Way  The Scout HQ is close to a bus route (SB1)  The Scout HQ has storage space for camping and activity equipment  The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.  18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.  It is invaluable for drying tents post camp, as this is something which requires space and time. Damp tents rot; being able to clean, dry and store them properly ensures the longevity of equipment, ensuring that scouts of all ages can benefit from them.  Collecting/preparing equipment ready for sleep overs and camps  Weekend activities " camps, sleepovers  Has an equipped kitchen, used by hall users and supervised children  It has its own car park.</p> <p>Demolishing this facility would have a detrimental affect on the immediate vicinity, not just locally but in the wider community. In an era where many people lament the loss of time spent outdoors in favour of screen time, the Scout Hut should absolutely be preserved.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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131		Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility</p> <p>Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities</p> <p>The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space.</p> <p>The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.</p> <p>18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.</p> <p>Both our children attend there and have done since they were 6. The experiences they have had at the Scout Hut, the friends they have made and the lessons they have learnt are invaluable.</p> <p>These experiences wouldn't be the same without the facilities I Drakes Drive.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
132	0	Other Comments	HO1/13	Housing site allocation	<p>Stop taking away what's left of Stevenage for our children. You have closed playschemes , you have nothing free for kids anymore .</p> <p>The scout guy is a huge part of the community . You do not need to Lee building house on every bit of ground.</p> <p>They are never council homes for the families of Stevenage and are always for ones who are moved in from other towns and Ciu tries.</p> <p>It is not right and things have to change dramatically</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
133		Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this</p>

						and other local plan policies.
134		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>Chells scout group is a valuable resource for children and young people in the local area and is incredibly popular and well used. Chells Scout group is the biggest unit in Stevenage and many families see all their children go through beavers, cubs and scouts because the experiences they get are second to none. The opportunity to explore, take risks, learn, camps, shoot, badge work is something which is not really on offer to local children at an affordable price. It is also inclusive to everyone and the volunteers work hard to give the children and young people amazing experiences. My son joined in beavers aged 6 and is now in the scout section aged 13. He loves Chells scouts and it has given him a chance to make friends, take part of things he wouldn't usually do, build on independent skills such as cooking and team work which are invaluable for well rounded individuals.</p> <p>â€¢ The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility</p> <p>â€¢ Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities</p> <p>â€¢ The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space.</p> <p>â€¢ The Scout HQ is easy to access, only just off Mobbsbury Way</p> <p>â€¢ The Scout HQ is close to a bus route (SB1)</p> <p>â€¢ The Scout HQ has storage space for camping and activity equipment</p> <p>â€¢ The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.</p> <p>â€¢ 18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

					<ul style="list-style-type: none"><li>â€¢ Drying tents post camp!</li><li>â€¢ Collecting/preparing equipment ready for sleep overs and camps</li><li>â€¢ Weekend activities â€” camps, sleepovers</li><li>â€¢ Has an equipped kitchen, used by hall users and supervised children</li><li>â€¢ It has its own car park.</li></ul>	
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135		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>Chells scout group is a valuable resource to the local community offering fantastic Opportunities for local children and young people. It is the biggest unit in Stevenage and extremely well used and loved by many families who often have all their children go through Chells scout group. My son has been in this group since he was 6 starting in beavers and he is now in scouts aged 13, he loves the activities that he has been able to take part in many of which he wouldn't have ever had the opportunity to take part in if it wasn't for Chells Scouts.</p> <p>Stevenage scouting has already lost a scout hut which has been handed back to the council and earmarked for housing, another hut lost would be incredibly unfair and feel like the feeling and thoughts of local families using the facility have been disregarded.</p> <ul style="list-style-type: none"> <li>• The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility</li> <li>• Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities</li> <li>• The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space.</li> <li>• The Scout HQ is easy to access, only just off Mobbsbury Way</li> <li>• The Scout HQ is close to a bus route (SB1)</li> <li>• The Scout HQ has storage space for camping and activity equipment</li> <li>• The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.</li> <li>• 18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.</li> <li>• Drying tents post camp!</li> <li>• Collecting/preparing equipment ready for sleep overs and camps</li> <li>• Weekend activities – camps, sleepovers</li> </ul>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
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					<p>â€¢ Has an equipped kitchen, used by hall users and supervised children</p> <p>â€¢ It has its own car park.</p>	
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136		Other Comments	HO1/13	Housing site allocation	<p>I have spent many years at chells scout hut and believe it should still remain as a communy centre. It would be a great shame to turn this into housing and remove the community that has derived from this location. I have developed into the person i am today from the support of the community created here and it would be a great shame to see this become another block of flats alike most if the Stevenage area. I wish the best for the future community common areas as they are becoming few and far between. Best regards to the future generation as they will surely need it. Kind regards Ben.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
137		Other Comments	HO1/13	Housing site allocation	<p>It is one of the few remaining spaces in Stevenage for youth groups and activities to be held. It has been a huge presence in the community for many years and would be a loss to a large part of childrenâ€™s developmental opportunities in early years. Generations of children have experienced scouting through this hut from 5-18 years, for the sake of 10 houses, (most likely not affordable housing for local people) we would have lost a commodity!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
138		Other Comments	HO1/13	Housing site allocation	<p>I am constantly hearing the challenge for various industries is to get talent for the future prosperity of the UK. One differentiator is Scouting - the skills obtained that prepare our young people for tomorrow - so why would SBC consider taking away a Scout Hut that has a thriving membership and also other community groups meeting there. Let's make a national plan - what will the UK's position be in the World and then build a capability to deliver the plan - of which Scouting will continue to contribute so much!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

139		Other Comments	HO1/13	Housing site allocation	Chells scout headquarters has served many young people for a great number of years and it is all down to voluntary help no paid personnel thus a charity With very little else provided for the youth of today and another scout hq already requisitioned for housing recently where are they to go and what facilities available	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
140		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. I appreciate there may be a need for more housing in Stevenage, but there are already larger developments nearby. As the land is owned by the Council, I guess there is a financial benefit to selling the land to a developer for housing, or collecting rent from tenants.</p> <p>However, Drakes Drive is quite a narrow street to deal with the additional traffic from these homes. Development/construction work would have a potentially large negative effect on traffic in the area, including noise and other inconveniences to local homes and The Nobel School.</p> <p>Has any consideration been made to where a replacement Scout Hut would be built, to serve the same local catchment and provide the facilities and experiences that the current Hut provides? Inevitably, it would need to have the same or greater area, be close by, have the same or upgraded facilities and be funded by part of the proceeds of any housing development that caused it.</p> <p>The Scout Hut doesn't just serve the children and young people who attend, but reaches out to the wider community through volunteers, family and friends.</p> <p>Its impact is therefore much greater than a headcount on any weeknight. The recent Campfire and Fete held were examples of how the green space is used by an even larger group of people in the community. Young people are the future of our town, and the skills gained and values instilled by the Scouts/Cubs/Beavers have a positive effect on society.</p> <p>If a cost/benefit analysis is made of this proposal, some consideration must be made of the numerous benefits to our young people of participation in Scouts/Cubs/Beavers. If Stevenage were to lose this facility, the repercussions to society would be negative. Think of activities available to young people in Stevenage- swimming pool, bowling, cinema, arcades. All of these are more costly and concentrated close to the town centre. We want to distribute, not concentrate activity in Stevenage to foster greater</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

					activity and not exclude those who cannot travel to the centre, or cannot afford to pay for the activities there.	
141		Other Comments	HO1/13	Housing site allocation	<p>HO1/13</p> <p>Chells Scout Group is an amazing opportunity for children both boys and girls from the age of 6 to 14 to learn many skills through the Scouting community and has always been one of the most popular and well attended groups in Hertfordshire for decades.</p> <p>Its prime location is one of the main reasons centralised in Stevenage with a large catchment area, often referred to as a "Super Group"™.</p> <p>Removing this facility from this location will be detrimental for the youngsters in this area and the surrounding for a social group that gives them confidence and skills often not provide by schools or other groups.</p> <p>With a designated small field attached allows the group to lower costs as they can carry out many activities on site involving scouting type activities that many other Scout groups do not have hence making it so popular and well attended.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

142		Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>Over 100 kids use Scout HQ every week, giving them constructive and supervised activities and the field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space. The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility. My son and many other children really enjoys activities organised by the leaders and it's very important for their learning and development.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
143	2	Other Comments	HO1/13	Housing site allocation	<p>Scouts hut is widely used, it's a place for young people to make new friends and engage with each other. They have amazing adventures and learn many new skills like outdoor skills, life skills personal development skills. Both my children absolutely love going to scouts each week and would be a big disappointment and upsetting if this has to stop.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
144		Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The community and scouting organisation are actively using this scout for positive means. This scout hut has stood for many years and has a rich history that we hope to preserve and build on.</p> <p>Chells Scout Group are the largest scouting group in Stevenage and provides opportunities for over 100 young people who are members of the group. The scout group are active in the community, recently hosting a fair that saw a wide range of both scouting members and people from both a local and wider community participate. Removing this scouting hut would be a disservice to all and harm the local community.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

145	1	Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. This is an extremely audacious idea which will destroy a vital community hub and simply cannot be justified.</p> <p>The Scout HQ is in use 5 evenings a week and most weekends, so is a popular and well used community facility. Hundreds of youngsters use the Scout HQ every week, giving them constructive and supervised activities outside of school. The outdoor space itself is just as invaluable as it is used for various activities for all young people. This space even recently hosted a Summer Family Fun Day that was open to all members of the public which was even attended by the MP for Stevenage, Kevin Bonavia, so it is crystal clear just how important this community hub is for Stevenage. A letter is being sent to MP Bonavia to highlight this damaging council plan and to request his support in saving the Scout HQ. Both indoor and outdoor facilities are used for camping and other recreational activities. The Scout HQ is always looking to grow for more young people to attend.</p> <p>This is a multigenerational community location where members of the same families dating back to the 1960s have used this space and still are to this day. The hundreds of young people that use the hut and learn life skills the Scouts have to offer, not to mention the various other businesses and uses the building and outdoor space has for the community. Demolishing the building for 18 units of housing to be crammed in to an already developed area will show no benefit to the local area. Drakes drive is a narrow road and will suffer the pressures of overdevelopment and lack of community facilities.</p> <p>There are zero plans in place to manage the loss of such an important space. How can a community facility be reprovided once you have built on the very land it belongs in or its loss satisfactorily justified when it is clear the loss simply cannot be justified. A substandard process has been used to identify this area to be unnecessarily developed with great cost to the local area.</p> <p>The council needs to look in a mirror and think about the motto of Stevenage, "The Heart Of A Town Lies In Its People". How can the town have a heart if its people have nowhere to go?</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
146	1	Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive. Over 100 youngsters, including my own, use Scout HQ 5 evenings a week and most weekends. It is providing youngsters with something to do, keeping them out of trouble and teaching them important life skills.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can

						be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
147	1	Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The Scout hut is a well-used facility throughout the week, and at weekends.</p> <p>It is home to the largest Scout Group in Stevenage with over 100 members.</p> <p>It provides safe, supervised activities for its members with the field being an integral part of this.</p> <p>The hut also includes storage space for camping and activity equipment.</p> <p>It is a hugely important facility for its young members, their families, its adult volunteers and the community which has built up around the Group.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
148	2	Other Comments	HO1/13	Housing site allocation	<p>I object to the proposal of building 18 houses on Chells Scout Hut (HO1/13). This scout hut is key to the community and offers children a fun affordable activity every week with outside space while learning key skills. My son attends this scout hut and it is his favourite day of the week. It would be a real shame to take this facility away from the area. Also drakes drive is already a very busy road, and I am not sure how it would even be possible to build 18 homes on this site with appropriate parking etc.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
149	2	Other Comments	HO1/13	Housing site allocation	<p>I object to the proposals for HO1/13 for the following reasons:</p> <p>Removal of significant local amenity without clear plans to manage the loss of local amenity to local groups.</p> <p>Development of significant number of properties in developed housing area not in keeping with local area</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can

					Development would add significant issues in relation to transport, parking etc.	be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
150	2	Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>This site is used by many and has the largest Scout group in Stevenage. It provides many children and young people with the opportunity to learn new skills, make friends and understand how to be a part of their community. To take this away would have a huge impact on so many children and families for the replacement of an insignificant amount of homes.</p> <p>I moved to Stevenage 3 years ago and my son has been attending Beavers since we moved. It's easily accessed for all with hard working volunteers who go that extra mile to make a difference in the community by giving their time to put on activities and camps to help our children grow and develop. I fail to see how building 18 homes surpasses the benefit to over 100 young people who use this facility on a weekly basis.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
151	2	Other Comments	HO1/13	Housing site allocation	<p>I wish to object to the proposal to develop the Chells Scout Hut (H01/13) into 18 buildings. This is a key local service for the youth of the area, which is in use 5 nights a week, to support the largest scout group in Stevenage. I was both a Venture Scout and a Scout Leader in this group, and can testify to the value of scouting in my own life, and those of the many children who have been through the group. The current scout hut is in a very convenient location, with good facilities, storage, parking and access. If there are to be more homes and therefore more people in Stevenage, then there is an even greater need for facilities such as the Chells Scout Hut. Please make sure it is kept for the future.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.

152	2	Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The building has been in use since the 1960s. There are over 100 young people using the hut every week, having constructive and supervised activities. This is particularly relevant given that the council play schemes have been closed. The hut is in use every evening and most weekends. It gets used for camps and sleepovers, fetes and camp fires. The hut provides storage for camping and activity equipment. The hut is used for meetings, leader meetings, exec committee meetings. The field is used for games, camps, training, fire lighting, nature activities, archery, cooking on fires, night sky observations. Over the years, it has also been used by Guides, Brownies, dancing schools, dog clubs, other Scout Groups, Explorer Scouts, funerals, church groups. So this is a facility that is well used by the community. The 18 homes earmarked for the site is an insignificant amount compared to the thousands being built at the moment. But the difference this building makes to so many in the community is huge!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
153	2	Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>Two of my children attend Chells Scout hut. We go there on Mondays and Fridays.</p> <p>My son goes to chells beavers and my daughter goes to Brownies 20th. The hut is ideal for them to have these activities! They have managed to learn how to put up tents and archery on the field.</p> <p>This is a vital building for so many children! It gets then leaning outside of the house, away from electronics!</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
154	2	Other Comments	HO1/13	Housing site allocation	<p>I oppose H01/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.</p> <p>My son has been going to scouts since he turned 6 and the skills and experience he has gained there are invaluable. The events the scouts hold bring the community together and its not fair to take that away considering how much little opportunities we have already.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>



155		Other Comments	HO1/13	Housing site allocation	<p>I oppose HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility  Over 100 youngsters use Scout HQ every week, giving them constructive and supervised activities  The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space.  The Scout HQ is easy to access, only just off Mobbsbury Way  The Scout HQ is close to a bus route (SB1)  The Scout HQ has storage space for camping and activity equipment  The Chells Scout Group is the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.  18 homes out of the thousands being built is an insignificant number. The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week.  Drying tents post camp!  Collecting/preparing equipment ready for sleep overs and camps  Weekend activities “ camps, sleepovers  Has an equipped kitchen, used by hall users and supervised children  It has its own car park.</p> <p>My kids love going there scouting, it is convenient distance from our home, the field always has activities for the whole family and during this financial crisis we all are facing, these relatively cheap family activities make my kids happier and gives us the chance to socialise and be part of something amazing.  This place is for my kids to learn useful things and be a part of a community. It is essential for both physical and mental health of all kids who attend scouts to preserve this hut.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
156		Other Comments	HO1/13	Housing site allocation	<p>I propose against the building of 18 dwellings on location HO1/13 Chells scout hut, due to it being a spot for the local community and the young people to attend scouts, beavers and brownies and learn life skills.</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not</p>

						be permitted. The facility is protected under this and other local plan policies.
157	3	Other Comments	HO1/13	Housing site allocation	<p>I object to the proposed HO1/13 chells scout hut being demolished and used for 18 units.</p> <p>The scout hut is a main stay for the local young people for Scouts, Beavers, Cubs and Brownies and the numerous other businesses that hire the place.</p> <p>With over 180 young people that use the hut and learn life skills the Scouts have to offer would be a travesty. The hut has been there since the 70s/80s and served the community in all that time.</p> <p>To build another 18 units would put pressure on the narrow road network on Drakes drive and local amenities, and this was the reason the other plan to build the two dwellings on Mobbsbury way was stopped.</p> <p>The land that the hut is on enables a safe area for camping and activities, secured away from a main road and is secure, it provides an area to hold community fetes and events</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
158	2	Other Comments	HO1/13	Housing site allocation	<p>I am opposed to the HO1/13 proposal for the Drakes Drive Scout Hut to be developed into 18 dwellings. This is a much valued spot in the community for boys and girls of all ages. Most of the attendees live within a small catchment area surrounding this and chose it for itâ€™s convenient location. Attending a local Scout Association group allows our young people the chance to thrive giving them access to unique opportunities and experiences not afforded to them through most other clubs. This particular plot of land not only provides a fantastic base in terms of the actual hut, but the generous outdoor land allows for camping practice, campfires and fundraising events.</p> <p>Whilst the main purpose of this land is for the use of the Scout Association, it cannot be ignored that it is also utilised by local small businesses for example a dog training school have regular classes and an inflatables company who use the premises to test their equipment as needed free of charge.</p> <p>All of the above points more than demonstrate the immense value this plot of land holds for the community and it should be protected for generations to come.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
159		Other Comments			G	

160	3	Other Comments	HO1/13	Housing site allocation	<p>I oppose the reallocation of land of the Chells Scout Hut for residential use as it is a community use and is used regularly through out the week.</p> <p>clause 9.9, page 104</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>
162	2	Other Comments	HO1/13		<p>Scout huts and their associated ground must be removed as prospective house building locations in the local plan. Bedwell lost their scouts group and Sea Cadets unit due to a housing scheme (which has not even started so the buildings are left derelict) . Chells Scout Group's Scout Hut has been marked as a possible location for housing and this is not correct. It is a huge Scout Group with usage of the building every single evening. They need a new lease so they can continue to provide scouting for the huge youth community in Chells. Notwithstanding that extra housing on that site would be very unwise due to the narrow access road, already significant lack of parking and loss of gteen space</p>	<p>Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.</p>

165		Other Comments	TC4, SP1	<p>Thank you for the opportunity to comment on the draft amendments to Stevenage’s Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. We note that this consultation is focussed on a partial update to the vision and set of strategic objectives for the Local Plan, rather than a whole Local Plan.</p> <p>We generally support the changes to the vision and objectives. The main spatial planning topics are suitably reviewed with comprehensive detail, and we welcome the direction of travel in relation to climate change. Further changes to policy relating to trees and woodland, and flooding and drainage are also supported and are considered in line with climate change policy. We broadly support the changes to the overarching spatial strategy for the Local Plan which shows an update to the use classes and development focussed within the Station Gateway Opportunity Area. This is once again in line with the updated climate change policy. While the Three Rivers District does not border that of Stevenage Borough Council we would suggest that we seek to liaise to discuss any potential future cross-boundary issues and progress with our respective plan-making.</p> <p>Please also note this response comes from the Planning Policy team at Three Rivers District Council and is an officer response only.</p> <p>Yours sincerely,</p> <p>Three Rivers Planning Policy Team</p>	Comments acknowledged and noted.
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166	0	Other Comments		Nature, Biodiversity	<p>Having lived in Stevenage for over 10 years i very much enjoy the care and consideration that has always been made towards the open spaces and care of the natural world here. Recently i have noticed that much of the verges and green spaces are being left to grow, with many wild plants and flowers appearing. I am absolutely enjoying the beauty and variety and am extremely hopeful that this decision to allow more natural growth and flourishing will permit and enable wildlife including, but not limited to, insects and birds, bees and butterflies, to begin to return and increase in our town.</p> <p>My children and i have been enjoying walking over the Fairlands Valley Park lower field on the school run, and were particularly enjoying walking amongst the many wild flowers that were starting to come up, and have been playing in this lovely space. We were so disappointed when the grass was cut this week and those beautiful flowers were gone.</p> <p>I have also noticed some very lovely planting of wildlike flowers around the edges of Shephalbury Park, which has been our local park. It is a joy to discover this beauty and care here. Thank you.</p> <p>So i would like to say thank you, please keep up these actions, to the people who are involved in this care and decision making.</p> <p>I would love to see the people who have traditionally maintained the verges and green spaces offered the opportunity to be trained in action that cares for the environment here so that their livelihoods can be maintained.</p>	Comments acknowledged and noted.
168		Other Comments	SP9		<p>It was noted that Policy SP9 Healthy Communities refers to NHS property. NHS England publish Health Technical Memoranda's (HTM) and Health Building Notes (HBN). Both advise on how NHS property should be built and operated. Of note is HBN 11-01 "Facilities for primary and community care services". This states on page five under Security that "All schemes should be considered against the criteria set down by the Secure by Design initiative (<a href="http://www.securedbydesign.com">www.securedbydesign.com</a>). An individual should have responsibility for decisions on security matters. On small schemes it may be sufficient to follow the principles of this guidance. For larger schemes a formal application should be made and sign-off achieved. The Secure by Design initiative covers the public realm in and around the building (see <a href="http://www.securedbydesign.com">www.securedbydesign.com</a>). Advice should also be sought from stakeholders and service providers relating to personal safety and protection of property." Therefore, mention should be made to the use of SBD within this section.</p>	Comments acknowledged and noted. Consideration has been given. Policy SP8 updated to include reference to reducing crime and the fear of crime in new developments.

179		Other Comments	HO1/13		<p>I am writing to you to say I oppose for HO1/13, the building of 18 homes on the land occupied by the Chells Scout HQ in Drakes Drive.</p> <p>The reason for why I oppose is because 18 homes out of the thousands being built is an insignificant number and the Scout HQ is in use 5 evenings a week and most weekends, so a popular and used facility. Not only is this hut in use 5 days a week, over 100 youngsters use the hut every week giving them constructive and supervised activities at the largest Scout Group in Stevenage with 2 Beaver Scout Colonies, 2 Cub Scout Packs and 2 Scout Troops, which is a product of the facilities there.</p> <p>The facilities at the Chells Scout HQ make a significant positive difference to the children who use it week by week. For example The HQ allows us to Collect/prepare equipment ready for sleep overs and camps and has an equipped kitchen, the kitchen is used by hall users and supervised children so they can learn to cook and to learn the health and safety while working around the kitchen. Without this vital part we would not be able to prepare food and run weekend activities - camps, sleepovers etc.</p> <p>The field is used for a number of activities, including camping, games, fire lighting &amp; cooking, archery, night sky observation, in a safe, secure space while having a place in the HQ to store space for camping and activity equipment.</p> <p>Without the car park which we are greatly appreciated to have we would not be able to use this so the youngsters can drop off or pickup their equipment for the camp ahead whether that's a camp at the hut or a camp in Wales, meanwhile the car park is a safe space where they can get dropped off or picked up from after being supervised to learn the skills they need.</p>	Comments acknowledged and noted. Community facilities will only be allowed to be lost where it can be demonstrated that they are no longer required, or that they can be satisfactorily relocated elsewhere. The scout hut is clearly used frequently, therefore its loss will not be permitted. The facility is protected under this and other local plan policies.
182		No Comment			Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make in response to the Regulation 18 consultation on the partial update of the Stevenage Local Plan.	Comments acknowledged and noted.

197		Other Comments				<p>Comments noted and acknowledged. The objectively assessed need (OAN) for housing in the Local Plan area was initially established through the Council's SHMA, 2015. In terms of the starting point for assessing the OAN for housing, the Council's adopted Local Plan (2019) SHMA used the DCLG (Department for Communities and Local Government) household projections which was in line with the requirement of the PPG at the time. This considered the 2008-based household projections as well as the 2011-based interim projections and the 2012-based projections. However, as noted in the inspectors report "account had also been taken of the ONS 2014 Sub National Population Projections (SNPP) and the DCLG 2014-based household projections which were released after the submission on the Plan". Although the Council's assessment indicated that these projections could result in a difference of an additional 300 dwellings over the Plan period, the Inspector concluded that "the scale of difference is extremely limited, and in this context is not meaningful. As such, the assessment has not been rendered out-of-date and a recalculation of the</p>
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						<p>OAN figure is not required".</p> <p>As part of the Local Plan Partial Review and Update the Council reviewed the current standard method (first introduced in 2018) which identifies the minimum number of homes that a local planning authority should plan for in its area. The NPPF makes clear that the outcome of the standard method should inform the preparation of local plans and establishing a housing requirement for the area. Having regard to the changes the latest housing needs assessment that underpins the Local Plan Partial Review and Update which is derived from the SHMA Part II joint North Hertfordshire District Council and Stevenage Borough Council Strategic Housing Market Assessment 2023. Consideration has been given to the affordable housing needs for Stevenage based on the latest official projections and cover the 9-year period 2022-2031. Informed by the latest ONS mid-year estimates take account of the most up-to-date fertility and mortality rates and the latest migration trends. In particular, focus upon the 2018 based 10-year migration trends, variant population and household projections. The data</p>
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						<p>within these projections was then adjusted in light of the mid-year population estimates 2019 and 2020. Choosing this set of projections represent the best and most up-to-date information available for population and household growth trends. As such the SHMA, 2023 confirms the Council's OAN estimated in the adopted Local Plan 2019 is robust and does not require updating during the Local Plan Partial Review and Update. The Councils Housing and Technical Paper 2024 further illustrates housing delivery will exceed the OAN figure of 7,600 dwellings before the end of the plan period 2031.</p>
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199		Other Comments		<p>NHS Property Services  NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.</p> <p>General Comments on Health Infrastructure to Support Housing Growth  The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area. Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure’s strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.</p>	Comments acknowledged and noted.
204		Other Comments		<p>The new National Planning Policy Framework (NPPF).  On 30 July the Government published a draft update to the NPPF and it is likely that following consultation that new national policy will be in place in Autumn 2024. In many respects the more delivery focussed draft policy which is explained in the accompanying Ministerial Statement reinforces the rationale for regenerating town centres like Stevenage. It is noted, however that the new policy will require the Council to look again at its approach to housing delivery (NPPF Chapters 3 &amp; 5) and there is more of a focus on identifying sites for commercial development which meet the needs of a modern economy, including identification of sites for uses such as laboratories etc (Chapter 6). Muse consider that the Station Gateway Site can help to contribute to meeting the new</p>	Comments acknowledged and noted.

					requirements and would welcome the opportunity to engage with the Council to help it to do so.	
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208		Other Comments		<p>I also note that it is intended to be 'partial' review to update the Local Plan in light of the latest requirements of a Local Plan. It seeks to update the Local Plan with corrections, additions, deletions and omissions. The following comments reflect this desire, and where relevant the comments are in italics.</p> <p>Firstly, it is noted that the Stevenage Horse and Pony Ride (SH&amp;PR) is inexplicably missing from this present 2011 – 2031 Local Plan and went unnoticed, therefore is an omission. The Stevenage Horse and Pony Riding Route was a vision of the Stevenage Development Corporation, now Stevenage Borough Council, and was very much part of the infrastructure of the plans for Stevenage Town. The previous Local Plan included the following:</p> <p>8.8.4 The Borough Council designated a Horse and Pony Riding Route in 1983 around the edge of Stevenage linking surrounding bridleways and incorporating a route diagonally across the Town through Fairlands Valley. The linking up of the existing Horse and Pony Route and its extension to the countryside is considered important as it is seen as an essential leisure facility and enables access to the countryside. It is therefore considered vital that the existing and proposed routes are protected. The retention, maintenance and extension of this route will therefore be promoted by the Borough Council. Developments which incorporate an existing Horse and Pony Route such as the development at Stevenage West will be expected to make provision to allow the routes to be extended into the surrounding countryside.</p> <p><b>POLICY L23: HORSE AND PONY ROUTE</b></p> <p>Any reduction to the existing and proposed Horse and Pony Route as shown on the Proposals Map will be resisted. Where appropriate, new developments will be expected to include land for the extension of the Horse and Pony Route. Any development which adversely affects the route will not be permitted unless a satisfactory alternative route is provided.</p> <p>This policy was supported with a published descriptive leaflet and map, and waymarking to mark the route. This omission is particularly relevant when consideration is given to the number of horses in and around Stevenage and their contribution to the local economy.</p> <p>The number of Horse Passports issued by DEFRA to Stevenage post codes is around 1300. Using the cost of keeping a horse of £5,000 per annum, this suggests the contribution to the local economy of £6.5M. This supports a large number of local businesses including feed merchants, tack and pet shops, vets, farriers, saddlers and harness makers, farmers, equestrian centres and stables, agricultural equipment, many in the rural economy.</p>	Comments acknowledged and noted. This issue will be considered as part of the Full Local Plan Review which commences next year.
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					<p>This omission can be rectified with the re-introduction of the Stevenage Horse and Pony Ride and it is suggested the following section is added to Policy SP12: Green infrastructure and natural environment:</p> <p>f. Stevenage Horse and Pony Ride Continue to develop and complete the Stevenage Horse and Pony Riding Route designated in 1983 around the edge of Stevenage and diagonally through Fairlands Valley as an extension to the countryside. Any reduction to the existing and proposed Horse and Pony Route as shown in the published Map will be resisted. Any development which adversely affects the route will not be permitted unless a satisfactory alternative route is provided.</p> <p>Additionally paragraph 5. 147 should be expanded to say: 'We want to keep the most important spaces for future generations to provide a green urban area and to link the town to the countryside including the Stevenage Horse and Pony Riding Route'.</p> <p>It is suggested a new paragraph is added following 5. 147 as shown: The linking up of the Horse and Pony Riding Route and its extension to the countryside is considered important and is seen as a leisure facility enabling access to the countryside and must be protected. The retention, maintenance, waymarking and completion of this route will be promoted by the Borough Council, and developments will be expected to make provision for routes to be extended into the surrounding countryside. It is complementary to the walking and cycling infrastructure and includes public rights of way and quiet highways.</p> <p>There are remaining gaps in the SH&amp;PR, and these are listed in the Hertfordshire Rights of Way Improvement Plan (RoWIP) to guide future developments. Some of these gaps are outside the boundary of Stevenage Borough Council and will require other local authorities to implement. This has always been the case of the SH&amp;PR plan</p>	
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209		Other Comments		<p>Moving onto the published documentation:  1. 'Simple Local Plan Booklet'  • Part III: Detailed policies and delivery – These are the detailed requirements that we will apply to individual planning applications to make sure that our vision and strategic policies can be achieved. It is noted that the SH&amp;PR is already taken into account in planning applications.</p> <p>Limited to necessary changes only, related to key drivers of change.  <b><i>The SH&amp;PR was omitted from the present Local Plan, hence is applicable as key drivers of change.</i></b></p> <p>Other wider changes will be considered for the next stage of the Local Plan Review, a Full Review of the Plan, from 2025 onwards.</p> <p>Under 'Minor Amendments': Few other minor changes include updates to any textual errors within the subtext and a review of the Proposals map to ensure it is up to date.  If there is an issue which you do not think is covered this is your chance to get it raised. We will be able to log all comments and review other areas when we proceed with a Full Review from 2025 onwards.  If this omission cannot be accommodated then it should be included in the Full Review starting in 2025.</p> <p>2. Justification Table  Partial Review and Update of the Stevenage Borough Local Plan 2011-2031 Schedule of Changes for Regulation 18 Consultation</p> <p>New paragraphs 1.7A and 1.7B  Local planning authorities are required to review their planning policies every five years to ensure that they remain fit for purpose. The Local Plan was adopted in May 2019 and the five-year period therefore elapsed in May 2024.  The omission of the SH&amp;PR should be logged for the start of the 2025 full review if it fails to be included in this partial review.</p> <p>5.29  There are also many jobs provided outside of our main employment areas  Thousands of people are employed in retail, leisure and other services. This plan recognises the importance of these sectors to jobs and growth and contains appropriate policies to protect and enhance their contribution in this regard.  The contribution to the local economy has been outlined above, but for completeness the number of Horse Passports issued by DEFRA to Stevenage post codes is around 1300. Using the cost of keeping a horse of £5,000 per annum, this suggests a contribution to the local economy of £6.5M. This supports a large number of local businesses including feed merchants, tack and pet shops, vets,</p>	Comments acknowledged and noted. This issue will be considered as part of the Full Local Plan Review which commences next year.
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210		Other Comments	NH4		<p>3. Stevenage Borough Local Plan 2011 – 2031</p> <p>14.25 This includes those footpaths and bridleways which link to the Stevenage Outer Orbital Path (StOOP). This is a 27-mile route which circles Stevenage using footpaths and other routes that are open to the public. All of StOOP lies outside of the Borough boundary. However, it is connected to Stevenage by eight 'link paths' which use public rights of way within our administrative area. These links are compatible with the SH&amp;PR and re-enforce the need to re-introduce it into this review.</p> <p>4. Policy NH4: Green Links The following routes, as shown on the policies map, are designated as Green Links:</p> <ol style="list-style-type: none"> <li>1. The Old Greens: Meadway to Fishers Green and Symonds Green;</li> <li>2. The Avenue / Forster Country: Bury Mead to St. Nicholas Church;</li> <li>3. Fairlands Valley: Hampson Park via Fairlands Valley Park to (a) Roebuck and (b) Shephall Green;</li> <li>4. Chells: Gresley Way to Narrow Box Lane and Nobel School;</li> <li>5. Collenswood: Gresley Way via Collenswood to Fairlands Valley Park / Chells Way;</li> <li>6. Bandley Hill: Gresley Way via Ridlins Park and Bandley Hill to Collenswood;</li> <li>7. Shephalbury: Gresley Way via Ridlins Wood and Loves Wood to Shephalbury Park;</li> <li>8. Water meadows: Broadhall Way to Hertford Road;</li> <li>9. Grace Way: Along the length of Grace Way between Fairlands Way and Martins Way; and</li> <li>10. Great Ashby: From Wellfield Wood and St Nicholas Park through Great Ashby to the Borough boundary at Severn Way.</li> </ol> <p><b><i>It is noted that majority of these aligned in some part with the SH&amp;PR and re-enforce the need to re-introduce it into this review. Only numbers 2 and 9 are excluded.</i></b></p>	Comments acknowledged and noted. This issue will be considered as part of the Full Local Plan Review which commences next year.
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211		Other Comments	GB1	<p>5. 12 The Green Belt Policy GB1: Green Belt The following broad locations, as detailed on the policies map, are designated as Green Belt:</p> <ul style="list-style-type: none"> <li>• Land bounded by Gresley Way, Broadwater Lane, the rear of properties at Goddard End, Broadhall Way, the A602 and Aston Lane;</li> <li>• Land to the south east of the Borough, accommodating the Three Horseshoes public</li> <li>• House and adjacent woodland.</li> <li>• Land to the east of the Borough, bounded by Gresley Way;</li> <li>• Land to the north of the Borough, bounded by Bury Cottages, Weston Road and the rear of properties at St Andrews Drive and St David Close;</li> <li>• Land to the north west of the Borough, bounded by Graveley Road, the A1(M) and</li> <li>• Stevenage Road;</li> <li>• Land at Norton Green, bounded by the A1(M);</li> <li>• Land at Junction 7 and to the south of this junction, bounded by the A1(M).</li> </ul> <p>12.3 In many parts of the town, the built up area of Stevenage extends right up to the Borough boundary. We have not identified a Green Belt boundary in these locations because we cannot set policies or designations for land that is not in Stevenage Borough. It will be for the adjacent local authority to decide whether they think the Green Belt should come up to the edge of Stevenage. We are working with North and East Hertfordshire to create a connected Green Belt boundary all the way around the town that will meet our development and community needs beyond the plan period.</p> <p><b><i>The SH&amp;PR should be included in any of these boundary discussions as stated above, some parts of the SH&amp;PR are in adjoining local authorities, often along the boundary line.</i></b></p>	Comments acknowledged and noted. This issue will be considered as part of the Full Local Plan Review which commences next year.
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215		Other Comments	TC8	High Street shopping Area	<p><b>POLICY TC8: TOWN CENTRE SHOPPING AREA</b></p> <p>We object to the deletion of the final sentence of this policy, which states that redevelopment within the Town Centre Shopping Area will be permitted only if it does not harm the Town Square Conservation Area. We believe it is important to explicitly highlight that the Town Square is a Conservation Area to ensure that heritage considerations are factored into any decisions. Without this explicit reference, there is a risk that the impact on heritage assets might be overlooked or insufficiently considered during the planning process. Our recommendation</p> <p>The proposed change is unjustified, and the reference to the Town Square Conservation Area should be retained. The Regulation 18 consultation document clearly states that the scope of the review is limited to “necessary changes only, which are related to key drivers of change since the Plan was adopted in 2019”. However, no evidence has been provided to justify why this is considered a necessary change or to identify the specific key driver it pertains to.</p>	<p>This change to Policy TC8 is necessary because the existing text is contrary to national policy, which allows for harmful development subject to the appropriate public benefits test. An outright ban on harmful development, as the policy is currently worded, is therefore unjustified.</p> <p>In any event, protection for all of the borough’s conservation areas is provided by Policy SP13 and Policy NH10. It is unnecessary to duplicate these protections under every area-specific policy within other chapters. Together with the statutory duty to protect heritage assets and national policy set out in the NPPF, Policies SP13 and NH10 are sufficient to ensure the adequate protection of conservation areas, regardless of their location.</p>
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216		Other Comments	TC9	High street shopping Area	<p><b>POLICY TC9: HIGH STREET SHOPPING AREA</b>  We object to the proposed deletion of criterion 'b', which states that permission will be</p> <p>granted only if it does not harm the significance of any designated heritage asset(s), including their setting. We believe it is important to highlight that the Town Square is a Conservation Area to ensure that heritage considerations are factored into any decisions. Without this explicit reference, there is a risk that the impact on heritage assets might be overlooked or insufficiently considered during the planning process.</p> <p>Our recommendation  The proposed change is unjustified, and criterion 'b' should be retained. The Regulation 18 consultation document clearly states that the scope of the review is limited to "necessary changes only, which are related to key drivers of change since the Plan was adopted in 2019". However, no evidence has been provided to justify why this is considered a necessary change or to identify the specific key driver it pertains to.</p>	<p>This change to Policy TC8 is necessary because the existing text is contrary to national policy, which allows for harmful development subject to the appropriate public benefits test. An outright ban on harmful development, as the policy is currently worded, is therefore unjustified.</p> <p>In any event, protection for all of the borough's conservation areas is provided by Policy SP13 and Policy NH10. It is unnecessary to duplicate these protections under every area-specific policy within other chapters. Together with the statutory duty to protect heritage assets and national policy set out in the NPPF, Policies SP13 and NH10 are sufficient to ensure the adequate protection of conservation areas, regardless of their location.</p>
217		Other Comments		local knowledge	<p><b>CONCLUSIONS</b>  In preparation of the forthcoming Local Plan review, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.</p> <p>Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p> <p>Should you have any questions regarding the comments provided,</p>	Comments acknowledged and noted.

					please feel free to contact me. In the meantime, we look forward to continuing to work with you and your colleagues.	
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218		Other Comments	SP7	Housing Need	<p>Scope of the partial review The Council have chosen to undertake a limited review of the local plan and not looked to update policies relating to development needs. The HBF consider this to be an inappropriate response given that the housing requirement in the adopted local plan is well below the starting point for considering the number of homes required in Stevenage arrived at using the standard method. As the council will be aware the local housing needs assessment using the standard method would require the council to plan for a minimum of 474 dwellings per annum (dpa), 95 homes a year more than the current housing requirement set out in policy SP7 of the local plan.</p> <p>Given that the policy is more than 5 years old, not based on a up to date or policy complaint assessment of housing needs that only looks ahead to 2031, HBF would have expected the council to revisit this policy, or more sensibly the whole plan, and set out a long term strategy for meeting housing needs. While HBF recognises that Stevenage is relatively constrained its urban edge meaning that needs may not be met in full. However, if this were the case a detailed consideration of housing needs and supply over a policy compliant plan period would have enabled the council to co-operate effectively with its neighbours and plan for any unmet housing needs that may arise. The council's decision to not revisit SP7 could hamper co-operation in future and limit the ability of the other authorities to prepare plans that address the unmet needs of Stevenage should thy arise. This is particularly important given that East Hertfordshire has just commenced a review of its Local Plan and North Hertfordshire is required to undertake an early review of its local plan that was adopted in 2022.</p> <p>The HBF therefore recommends that the Council undertakes a full review of its local plan and delivers a strategy alongside its partners that meets the housing needs of Stevenage in full.</p>	<p>Comments noted and acknowledged. The objectively assessed need (OAN) for housing in the Local Plan area was initially established thorough the Council's SHMA, 2015. In terms of the starting point for assessing the OAN for housing, the Council's adopted Local Plan (2019) SHMA used the DCLG (Department for Communities and Local Government) household projections which was in line with the requirement of the PPG at the time. This considered the 2008-based household projections as well as the 2011-based interim projections and the 2012-based projections. However, as noted in the inspectors report "account had also been taken of the ONS 2014 Sub National Population Projections (SNPP) and the DCLG 2014-based household projections which were released after the submission on the Plan". Although the Council's assessment indicated that these projections could result in a difference of an additional 300 dwellings over the Plan period, the Inspector concluded that "the scale of difference is extremely limited, and in this context is not meaningful. As such, the assessment has not been rendered out-of-date and a recalculation of the</p>
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						<p>OAN figure is not required".</p> <p>As part of the Local Plan Partial Review and Update the Council reviewed the current standard method (first introduced in 2018) which identifies the minimum number of homes that a local planning authority should plan for in its area. The NPPF makes clear that the outcome of the standard method should inform the preparation of local plans and establishing a housing requirement for the area. Having regard to the changes the latest housing needs assessment that underpins the Local Plan Partial Review and Update which is derived from the SHMA Part II joint North Hertfordshire District Council and Stevenage Borough Council Strategic Housing Market Assessment 2023. Consideration has been given to the affordable housing needs for Stevenage based on the latest official projections and cover the 9-year period 2022-2031. Informed by the latest ONS mid-year estimates take account of the most up-to-date fertility and mortality rates and the latest migration trends. In particular, focus upon the 2018 based 10-year migration trends, variant population and household projections. The data</p>
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						<p>within these projections was then adjusted in light of the mid-year population estimates 2019 and 2020. Choosing this set of projections represent the best and most up-to-date information available for population and household growth trends. As such the SHMA, 2023 confirms the Council's OAN estimated in the adopted Local Plan 2019 is robust and does not require updating during the Local Plan Partial Review and Update. The Councils Housing and Technical Paper 2024 further illustrates housing delivery will exceed the OAN figure of 7,600 dwellings before the end of the plan period 2031.</p>
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235		Other Comments	HO10	Older persons and housing	<p>Older Persons Housing Policy (Policy HO10)</p> <p>The revised draft plan proposes to amend Policy HO10 to remove support for sheltered and supported housing schemes more generally. It is unclear why the council propose to remove this support given that the NPPF paragraph 63 explicitly sets out that local plan authorities should assess the need for an include policies which seek to meet the needs of specific groups including older people.</p> <p>Recommendation</p> <p>The following text should be retained:</p> <p>Planning permission for sheltered and supported housing schemes will be granted where:</p> <ul style="list-style-type: none"> <li>a. The site is well served by passenger transport;</li> <li>b. There is good access to local services and facilities such as neighbourhood centres; To prevent duplication of other plan policies.</li> <li>c. Appropriate levels of amenity space and car parking for residents, visitors and staff are provided; and</li> <li>d. The proposal is appropriate to its locality.</li> </ul>	Comments noted and acknowledged.
236		Other Comments		Coverage of partial Review	<p>Coverage of the Partial Plan Review</p> <p>Central Bedfordshire Council (CBC) recognises that Stevenage Borough Council (SBC) declared a climate emergency in June 2019 and reconfirmed a commitment to tackling climate change and its impacts by setting a target to ensure that Stevenage has net zero carbon emissions by 2030.</p> <p>The inclusion of a strong focus on climate change as part of the plan review is therefore understandable and the intention to require development to contribute to both mitigating and adapting to climate change is supported.</p> <p>Notwithstanding this, since the adoption of the Stevenage Local Plan in May 2019, much has changed at a national level, including the Levelling Up and Regeneration Act (2023), Environment Act (2021) and updates to the National Planning Policy Framework (NPPF) in July 2021, September 2023 and December 2023.</p> <p>As such, it is surprising that a full plan update (following the review of the plan) is not deemed to be required to reflect these changes. The justification says 'the spatial strategy remains fit for purpose', but there is no further explanation as to how this conclusion has been reached.</p> <p>Alongside this, given the current government NPPF consultation and the proposals to deliver 1.5 million new homes, CBC would be interested to understand if the Council will now be considering undertaking a full update instead, particularly as the proposed transitional arrangements outlined within the consultation state that 'all plans at earlier stages of preparation (i.e. plans that have not yet reached Regulation 19 stage one month after the revised NPPF is published) - should be prepared against the revised version of the NPPF and progressed as quickly as possible'.</p>	Comments acknowledged and noted. Evidential studies and technical papers to be published ahead of Regulation 19



237		Other Comments		Coverage of partial Review	<p>General comments</p> <p>Anglian Water supports the Partial Review’s prioritisation of Climate Change policies.</p> <p>Given that the current Local Plan was adopted in May 2019 and covers the period to 2031 there could be a case that the whole Local Plan should be updated. We note that as of 31 July 2024 a new Plan could now be prepared under current regulations and submitted a further 18 months later, in or before December 2026. In view of the timescale for Examination and then adoption the New Plan could then prospectively cover to 2040 or later in that decade to provide certainty for growth and the provision of infrastructure to support new homes and businesses. Anglian Water’s own Plans have a five-year rolling review and the latest draft Plans to be finalised in December 2024 plan to 2050 and set out investment from 2025 to 2030.</p>	<p><b>Awaiting response from Simon Bird</b></p>
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248		Other Comments		Transport	<p>Highways</p> <p>As the Highway Authority our primary interest in Local Plans is in relation to its approach to highway and transport matters. We aim to provide a safe, efficient and resilient transport system that serves the needs of businesses and residents across Hertfordshire whilst minimising impact on the environment. Hertfordshire County Council adopted Local Transport Plan 4 (LTP4) 2018 – 2031 which sets out the long-term transport strategy for the County to accommodate housing and employment growth being identified by the Borough/District Councils in their Local Plans.</p> <p>LTP4 provides a framework to guide all our future transport planning and investment. It accelerates the transition from a previous transport strategy that was largely car based to a more balanced approach which caters for all forms of transport. Policy 1: Transport User Hierarchy states “to support the creation of built environments we encourage greater and safer use of sustainable transport modes.’ We therefore seek to encourage modal shift with a switch from the private car to sustainable transport (e.g. walking, cycling and passenger transport) wherever possible. Initial findings Hertfordshire County Council (HCC) welcomes Stevenage Borough Council’s (SBC) partial review of the local plan but has concerns about the effectiveness of the plan and about the updates which have been put forward (and those that have not) which we would like to address in this response.</p> <p>The existing local plan was brought forward under earlier versions of the NPPF and as mentioned above, LTP4 has since been adopted. The current NPPF requires local plans to more explicitly define the link between sites and infrastructure funding required for transport. This plan review provides an opportunity to robustly review and update the mitigations needed for site supporting transport infrastructure and to properly address sources of funding. This should be captured through ongoing updates of the Infrastructure Delivery Plan.</p> <p>This issue is becoming critically important for HCC as Highway Authority and especially so in CIL areas where S106 funding pots are now depleted so that cumulative impacts on settlements are unable to be addressed. We would suggest that this issue is addressed in a full plan review where the issue of infrastructure funding can be dealt with comprehensively. The Highway Authority is unlikely to support a plan through Examination if this issue is not addressed. Similarly the Highway Authority is increasingly unlikely to be able to support sites at the planning application stage if required highway mitigations are not able to be adequately funded.</p> <p>This response highlights the key issues and provides recommendations to ensure the plan effectively addresses the sustainable development needs of Stevenage and the surrounding area.</p>	
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249		Other Comments		Transport - key issues and concerns	<p>Key issues and concerns</p> <p><b>Lack of updates on sustainable transport aspirations:</b></p> <ul style="list-style-type: none"> <li>o The plan does not provide adequate updates on the aspirations for sustainable transport, despite being a critical overarching principle in the original local plan.</li> <li>o There is little or no mention of the latest transport plans and strategies, making it difficult to align the plan with current and future sustainable transport initiatives.</li> </ul> <p><b>Cohesion between delivery plans:</b></p> <ul style="list-style-type: none"> <li>o There is a noticeable lack of cohesion between different delivery plans, such as the local plan and the IDP, leading to fragmented and unclear information and a lack of detail regarding the deliverability of schemes and infrastructure.</li> </ul> <p><b>Progress since last local plan:</b></p> <ul style="list-style-type: none"> <li>o The partial review does not make it clear on what progress has been made since the last plan was adopted, particularly regarding securing funding contributions and the delivery of schemes and infrastructure projects.</li> <li>o There is a risk that the absence of updates over the last five years could render some aspects of the plans policies ineffective or inapplicable.</li> </ul> <p><b>Funding and development contributions:</b></p> <ul style="list-style-type: none"> <li>o There is a lack of transparency regarding the Community Infrastructure Levy (CIL) contributions, the status of the CIL pot, and the nature in which these contributions are being sought and secured.</li> <li>o HCC are concerned that there is a risk of opportunities being missed for funding contributions due to inadequate or unclear mitigation measures.</li> <li>o More synergy is required in attributing contributions to specific corridors in a CIL-compliant manner.</li> <li>o The mitigations and infrastructure requirements do not always align with the levels of expected growth. There is a danger that this disconnect could result in non-compliance with policy if appropriate contributions are not secured.</li> </ul> <p><b>Strategic Direction and Mitigation:</b></p> <ul style="list-style-type: none"> <li>o The plan is unclear on the strategic direction and mitigation measures needed to address the levels of development proposed. Given that all these interventions were required as part of the original local plan, it is essential to provide a clear plan for taking these interventions forward.</li> </ul> <p><b>Active travel focus:</b></p> <ul style="list-style-type: none"> <li>o Despite acknowledging the importance of climate change there is little additional focus on active travel or integrating sustainable transport initiatives. The plan should seek to increase its effectiveness by acknowledging and incorporating new strategies, guidance, and aspirations that have emerged since the original plan.</li> <li>o The Sustainable Travel Town initiative, E-bike scheme, LCWIP refresh, BSIP Programme, and Station Gateway redevelopment should be more prominently featured and supported.</li> </ul>	
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250		Other Comments		Transport - Recommendations	<p>Recommendations</p> <ul style="list-style-type: none"> <li>§ Provide clear updates on sustainable transport aspirations and future-plans, aligning with the latest strategies and initiatives.</li> <li>§ Include specific references to relevant transport plans to ensure coherence and clarity.</li> <li>§ Improve cohesion between delivery plans and provide detailed updates on progress since the last plan.</li> <li>§ <b>Increase transparency regarding funding contributions, particularly for CIL, and outline the status and future-plans for the CIL pot.</b></li> <li>§ Clearly articulate the strategic direction and mitigation measures to address the proposed levels of development.</li> <li>§ Provide detailed plans for securing and utilising contributions to ensure effective implementation of necessary infrastructure projects.</li> <li>§ Acknowledge new strategies and incorporate them into the plan to retain its effectiveness and relevance.</li> <li>§ Ensure that documents and workstreams are easily accessible and interconnected, enhancing the overall clarity and usability of the plan.</li> <li>§ Foster better synergy between different plans and strategies to create a cohesive and effective framework for development.</li> </ul>	<p>Comments acknowledged and noted. The Stevenage Infrastructure Delivery Plan (IDP) identifies the infrastructure required in order to support the delivery of the Local Plan to 2031. This informs how the Council will use CIL funds in Stevenage in order to meet the funding gap identified. The IDP covers a wide range of physical and social infrastructure including; transport, utilities, education, health, community facilities, emergency services and green infrastructure requirements. For more details / comments on the Council's developer contributions please see the Council's revised Developer Contribution SPD. <b>The consultation will run from 14th October to 10 November 2024.</b></p>
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251		Other Comments		Conclusion and further comments	<p>Conclusion HCC's position is that the partial review does not go far enough and represents a missed opportunity to strengthen the strategic focus and make the plan more resilient to future development. The partial plan review fails to adequately address the funding of transport infrastructure mitigations needed both for sites and settlements under the current NPPF – and the Highway Authority would be unable to support the plan at Examination as drafted. To address these concerns, it is crucial to update and align the plan with the latest sustainable transport strategies, improve cohesion and transparency, clarify strategic directions, and strengthen sustainability measures and aspirations. Further comments: Below are a list of more specific comments/feedback for consideration highlighted by HCC officers:</p> <ol style="list-style-type: none"> <li>1. 4.31 / 5.48 - Refers to Smart motorway - needs to be removed.</li> <li>2. 4.33 / Policy SP6 / 5.58a / 7.39E / 7.44 / 8.39 - Bus station already relocated.</li> <li>3. 5.47 - Refers to further road schemes identified to provide additional capacity on local roads predicted to come under stress. Includes junction improvements including motorway junctions - need to rephrase improving for all users. Mentions retention of smaller Tesco and redevelopment of site into other uses.</li> <li>4. SP6 - Strengthen wording to make sustainable transport more essential.</li> <li>5. 5.59 - Include proposals to remove town centre cycling ban and improve wayfinding</li> <li>6. 5.62 / 5.63 - Pro car wording – emphasise importance of reducing car usage. Reference importance of transitioning to Electric Vehicles.</li> <li>7. 7.19 - Multi-storey already built. Surface level crossing already in.</li> <li>8. 7.20 - Include proposals to remove the town centre cycling ban</li> <li>9. Page 95 - TCI refers to Southgate being reopened as trafficked street with shared surface. Refers to widening of Danesgate for buses and removal of Tower Road - have HCC been consulted on these changes and do they align with sustainable transport aspirations?</li> <li>10. Support of proposals for centre west opp area (Leisure Park)</li> <li>11. 7.33 / 8.36 - 5th platform already built.</li> <li>12. 7.39C - Refers to flexibility to change from buses and taxis only back to option 1 - all traffic on single carriageway - this was not agreed.</li> <li>13. Central core / Northgate - Refers to new MSCPs - provide locations</li> <li>14. Policy TC8 Pg 109 High St - Is this aligned with the High Street improvement consultation and proposals?</li> <li>15. IT1 - New vehicle accesses - needs to say new junctions need to consider needs of all users - including bus priority.</li> <li>16. 8.3 - No reference to North Road cycleway.</li> <li>17. 8.4 - Needs to be a sustainable link - not necessarily for vehicles.</li> </ol>	
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252		Other Comments		Conclusion and further comments	<p>18. 8.8 - Highlights the need for a SE roundabout, referencing the 2015 IDP – proposal out of date.</p> <p>19. 8.9 - Do these proposals align with the proposals in the GTP and Lytton Way / Station Gateway proposals?</p> <p>20. 8.10 - Needs to refer to sustainable access.</p> <p>21. IT4 - Ensure alignment with HCC planning movement and design guide</p> <p>22. IT5 - Ensure alignment with HCC planning movement and design guide. Reference LTN1/20.</p> <p>23. IT5 - Loss of off-street parking - Loss of parking can be mitigated by encouraging/facilitating sustainable modes of travel, particularly given that the current cycling network and public transport are underutilised.</p> <p>24. 8.30 / 8.33 and parking SPD (Supplementary Planning Document) - Ensure alignment with HCC planning movement and design guide</p> <p>25. 8.34 - Should be moved up in the section.</p> <p>26. IT6 page 121 - Needs updating. 5th platform already built along with bus station.</p> <p>27. Presumption in favour of planning permissions - Sets very low bar - e.g., contribution towards bus services - no threshold set.</p> <p>28. <b>No mention of CIL - Will contributions be pooled towards these priority schemes? These needs defining to ensure appropriate improvements/mitigations are clear and in place.</b></p> <p>29. No mention of bus priority - Need to recognise recent improvements to bus frequency through BSIP (Bus Service Improvement Plan).</p> <p>30. 8.38 - EWR route now further north.</p> <p>31. 8.40 - Update to ITU.</p> <p>32. Need to replace references to Hertfordshire LEP (Local Enterprise Partnership) with Hertfordshire Futures.</p>	<p><b>Comments acknowledged and noted. For more details / comments on the Council's developer contributions please see the Council's revised Developer Contribution SPD. The consultation will run from 14th October to 10 November 2024.</b></p>
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253		Other Comments		Conclusion and further comments	<p>33. IT7 / 8.45 - Do these routes align with what is included in the LCWIP or are they the basis for the development of new routes that could be included in an LCWIP refresh? Include a map of routes. Town centre cycling ban?</p> <p>34. Stevenage Cycle strategy - References Stevenage Cycling Strategy which was superseded by the LCWIP.</p> <p>35. No mention of bike hire scheme.</p> <p>36. 8.46 - This needs to include lifting the cycle ban.</p> <p>37. 8.47 - This should include the North Road corridor.</p> <p>38. 8.50 - General presumption against loss of car parking spaces in town centre, old town and at station - is there not spare capacity in Stevenage? - Has there been any updated parking survey post MSCP at station?</p> <p>39. Policy HO1 - Housing sites - have there been any changes since previous plan?</p> <p>40. H02 - No mention of secondary school - need to say something about direct and safe active travel routes to nearest school. Mentions EV (Electric Vehicle) charge points at accessible location - needs to be updated to new building regs and our EV strategy - this should be incorporated into each of the Housing site policies.</p> <p>41. HO3 - No secondary school - important to reference the importance of direct and safe active travel routes to nearest school.</p> <p>42. HO4 - No primary or secondary school - despite 550 units - where is nearest school - need to ensure hook is for direct active travel routes to the nearest facilities. Is the new roundabout providing the access an up-to-date proposal?</p> <p>43. No mention of STT.</p> <p>44. Part B - Needs updating suggest this is done as part of the STT work - Active travel strategy needs to specifically refer to the LCWIP and prioritised routes also bike hire scheme. Need to determine funding sources for maintenance of existing network.</p> <p>45. PT strategy - Needs updating as Thameslink timetable changes now made and 5th platform introduced.</p> <p>46. Car parking strategy - Has 2004 parking strategy been updated? - Have there been post MSCP parking surveys - needs to mention consolidation of parking.</p> <p>47. Car sharing - Need to give update on lift share schemes.</p> <p>48. Need for data update HCTS - Recognition of post-pandemic changes in working and travel patterns.</p> <p>49. Network management - We are not prioritising road capacity improvements at pinch points anymore.</p>	<p>Comments acknowledged and noted. Having regard to the housing needs assessment that underpinned the Local Plan (adopted 2019) The Local Plan Partial Review and Update is underpinned from the latest joint North Hertfordshire District Council and Stevenage Borough Council Strategic Housing Market Assessment (SHMA) Part II 2023. As such the SHMA 2023 confirms the Council's OAN estimated in the adopted Local Plan 2019 is robust and does not require updating during the Local Plan Partial Review and Update. The Councils Housing and Technical Paper 2024 further illustrates housing delivery will exceed the OAN figure of 7,600 dwellings before the end of the plan period 2031. therefore, there are no changes to Policy HO1.</p>
256		Other Comments		Proposals Map	<p>It is noted in the 'Minor Modifications and Updated Evidence' Local Plan Partial Review webpage that amendments will be made to the existing Policies Map. It is advised that the updated Policies Map should include all adopted Minerals and Waste policy designations in the Borough, including the current adopted Sand and Gravel Belt, safeguarded Waste Management Facilities, and the Langley Sidings Rail Aggregate Depot.</p>	<p>Comments acknowledged and noted. The Council intend to include all adopted Minerals and Waste policy designations in the Borough, including the current adopted Sand and Gravel Belt,</p>

						safeguarded Waste Management Facilities, and the Langley Sidings Rail Aggregate Depot in updated policies map.
257		Other Comments	TC10	Expansion of TC10 to accomodate Bedwell and improve health in the ward.	<p>1. The introduction of a local ward policy for Bedwell Introduction of a policy similar to the current Local Plan Policy TC10 but in the Bedwell alongside the expansion of the area covered by the current Policy TC10 to include the entirety of the Old Town Electoral Ward.</p> <p>Bedwell electoral ward has the strongest justification of all electoral wards in Stevenage for the introduction of a policy restricting new hot food takeaways and other policies aimed at improving local food environments as per the summary in Section 9 of the Evidence review by HCC.</p> <ul style="list-style-type: none"> <li>• A policy is strongly recommended in the Bedwell electoral ward and supported by robust evidence suggesting local health and the food environment are both particularly poor in this area.</li> <li>• The implementation of such a policy would work to reduce health inequalities in this area of the borough.</li> </ul> <p>1 The expansion of the existing Policy TC10  2 The expansion of Policy TC10 to cover the entirety of the Old Town electoral ward.  3 There is strong justification for policies to improve the food environment in the Old Town, due to its two secondary schools, high existing fast-food density (2.58 per 1,000 population), being ranked in Hertfordshire quintile 1 for distance to fast food outlet (shortest distance) and being in Hertfordshire Quintile 1 for IMD (most deprived). Such, justification, was sufficient for the existing policy TC10 to be implemented.  4 Alongside the existing justification, HCC WSO team recommend an expansion of the policy to accommodate recent changes to ward boundaries effecting both the Old Town and Bedwell electoral wards (Appendix C in report). A high density of fast-food takeaways currently exists in the Bedwell town centre and surrounding area near to Stevenage train station (Figure 3 in report). Most of this area remains within the new Bedwell electoral ward boundaries, however some of the HFT's will now fall within the Old Town ward.  Therefore, there is a need for a new policy in the Old Town electoral ward to additionally cover this area of high density, which would currently be missed if the existing TC10 policy was kept alongside a new Bedwell HFT policy.</p> <p>Recommended monitoring indicator/s associated with proposed policies</p>	Comments acknowledged and noted. We will consider restrictions on hot food takeaways during the Full Local Plan Review next year.



					<p>To allow the effectiveness of the recommended policies to be monitored, the HCC WSO team proposes the following indicator:</p> <p>No new HFT should be granted permission in the following wards:  Bedwell  Old Town</p>	
258		Other Comments		Air Quality	<p>Stevenage have high asthma prevalence and although no AQMAs air quality is above WHO guidance levels. Could you advise if when discussions take place there is information provided around placement of more at risk settings in terms of AQ e.g. keeping schools, care homes, affordable housing away from sources of pollution (typically strategic infrastructure) and where this is not</p>	<p>Comments acknowledged and noted. This is covered by Policy FP7 and FP8</p>

					possible to screen e.g. planting a wide dense tree belt to reduce exposure	
260		Other Comments		Use Class Order Changes	<b>Use Class Order Changes</b> We support the minor amendments made to Policies SP3, SP4, EC1, EC2, EC3, EC4, EC6, EC7, TC2, TC3, TC5, TC6, TC7, TC8, TC9, TC10, TC11, HC1, HC2, HC3, and HC5 and their associated supporting text to reflect amendments to the Use Classes Order.	Comments noted. No change.
272		Other Comments	HO11		Amended Policy HO11 We support the alterations made in the Policy to reflect the most up to date evidence available in the 2023 Strategic Housing Market Assessment.	Comments acknowledged and noted.
275		Other Comments	HC2	Local Shops	Amended Policy HC2 – Local shops Criterion e) is proposed to be amended to specify at least six-month vacancy timeframe. What is this timescale based on and is this a reasonable period of time to expect a shop unit to remain vacant for particularly in the current market climate. Whilst we appreciate that six months is more quantifiable than 'a considerable period of time', the proposed timeframe should be based in evidence, and it is not clear what that evidence is.	These changes are proposed for the sake of clarity and consistency. A more comprehensive review of timescales will be carried out as part of the full review of the plan, which commences next year. No change.
280		Other Comments		Glossary	New Appendix D – Glossary We support the addition of a Glossary to help clarify some of the wording and terminology included in the Local Plan.	Comments noted. No change.
281		Other Comments		Proposals Map	Amendments to the Proposals Map It would be useful to understand why amendments to the Proposals Map are taking place; are these errors that have been identified since the adoption of the Stevenage Borough Local Plan or are these amendments as a consequence of changes to Policies. Further information on this would be useful to provide more specific responses to this element of the consultation.	We are taking advantage of the new GIS system which will introduce a new public facing spatial platform for planning policy constraints in Stevenage. This will help to speed up the planning process, as applicants will be able to identify, from an earlier stage, the relevant constraints to their respective proposals before application. We are also taking this opportunity to ensure that the Policies Map is consistent with all other relevant maps and file

						formats in earlier spatial versions. We are not making specific changes to layers or boundaries as part of the Local Plan - Partial Review and Update; however we will be addressing this further when we progress to the Local Plan Full Review, from 2025.
282		Other Comments		Housing and Older people	<p>Point 2.13: Consider including the following challenge - Stevenage also has an ageing population. This combined with lower socio-economic challenges leads to lower life expectancy. Housing numbers and quality should reflect this.</p> <p>Point 3.29: Is it possible to include healthy ageing under the 'healthy people' category?</p> <p>Point 4.14: To note – It's great to see older people included here as part of the community need.</p> <p>SP2: I note that life expectancy and healthy lifestyles are here. Is it also possible to include a point around healthy ageing or lifetime homes to promote these agendas?</p> <p><b>SP2 Point 5.5: Questions for the editor: does the policy SP2 include HAPPI design principles or similar guidance?</b></p> <p>SP5 : To note – It's great to see supported housing included here as part of the community need. I assume this includes independent living / Flexi care?SP8: Can we include healthy ageing here or points around lifetime homes or HAPPI Design here?</p> <p>9 High-quality homes: Can housing for older people be included here within each section?</p> <p>Policy HO10: Sheltered and supported housing: Can you please confirm if the data was taken from the 2023 SHMA as above?</p>	<p>Comments acknowledged and noted. Policy HO10: Sheltered and supported housing has been considered in line with the latest SHMA 2023 and Housing Technical Paper 2024, as such proposed changes are reflected in Policy HO11, SP2 and SP5.</p> <p>HAPPI design principles will be considered further as part of the full review of the local plan, which commences next year.</p>

## Appendix 2 - Consultees

### *Specific Consultee Bodies and Duty to Cooperate Bodies consulted*

- *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 )*
- *The Homes and Communities Agency*
- *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 (including Growth & Infrastructure Unit, Public Health, Passenger Transport)*
- *Hertfordshire Highways*
- *Hertfordshire LEP*
- *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/organisations

<i>5th Stevenage Air Scout Group</i>	<i>Broadwater Community Association</i>
<i>Aberdeen Asset Management</i>	<i>Broom Barns JMI</i>
<i>Active4Less</i>	<i>Brown And Lee</i>
<i>Adlington Planning Team</i>	<i>Brown And Lee Chartered Surveyors</i>
<i>Age Concern Stevenage</i>	<i>Buddhist Centre</i>
<i>Ahmadiyya Muslim Association</i>	<i>Building Research Establishment</i>
<i>Aldi Stores</i>	<i>Bus Users Group Stevenage</i>
<i>Aldwyck Housing Association</i>	<i>C.D.Bayles</i>
<i>Almond Hill Junior Mixed School</i>	<i>Campaign for Real Ale</i>
<i>Alzheimer's Society</i>	<i>Campaign For Real Ale Ltd</i>
<i>Anglian Water</i>	<i>Camps Hill Community Primary School</i>
<i>Aragon Land And Planning</i>	<i>Canyon Play Association</i>
<i>Archangel Michael And St Anthony Coptic Orthodox Church</i>	<i>Carers in Hertfordshire</i>
<i>Arriva</i>	<i>Catesby Property Group</i>
<i>Arriva The Shires And Essex Buses</i>	<i>CBRE Ltd.</i>
<i>Ashtree Primary School</i>	<i>Central Bedfordshire UA</i>
<i>Asian Women Group</i>	<i>Centrebus</i>
<i>Association of North Thames Amenity Societies</i>	<i>Chair North Herts Ramblers Group</i>
<i>Aston Parish Council</i>	<i>Chambers Coaches Stevenage Ltd</i>
<i>Aston Village Society</i>	<i>Chells Community Association</i>
<i>Aviva Investors</i>	<i>Chells Manor Community Association</i>
<i>BAA Safeguarding Team</i>	<i>Chells Scout Group</i>
<i>Barclay School</i>	<i>Chelton Radomes</i>
<i>Barker Parry Town Planning</i>	<i>Christadelphian Community</i>
<i>Barnwell School</i>	<i>Churches Together</i>
<i>BEAMS Ltd</i>	<i>Churches Together in Stevenage</i>
<i>Bedwell Community Association</i>	<i>Circle Anglia</i>
<i>Bedwell Primary And Nursery School</i>	<i>Citizens Advice Bureau</i>
<i>Bell Cornwell LLP</i>	<i>Clague Ashford</i>
<i>Bellway (Northern Home Counties)</i>	<i>Codicote Parish Council</i>
<i>Bellway Homes</i>	<i>Colinade Associates Ltd</i>
<i>Bellway Homes Miller Homes</i>	<i>Colliers International</i>
<i>Bellway Homes, Miller Homes &amp; Wheatley Plc</i>	<i>Commercial Estates Group</i>
<i>Bidwells</i>	<i>Connexions Stevenage</i>
<i>Bloor Homes</i>	<i>Cortex</i>
<i>Bloor Homes South Midlands</i>	<i>Costco Wholesale UK Ltd</i>
<i>Borough of Broxbourne</i>	<i>Countryside Management Service</i>
<i>Bragbury End Residents Group</i>	<i>Countryside Properties plc, Stevenage Rugby Club and the Homes and Communities Agency (Cambridge)</i>
<i>Bridge Builders Christian Trust</i>	<i>CPRE Hertfordshire</i>
<i>British Horse Society</i>	<i>Crossroads Care (Hertfordshire North)</i>
<i>Croudace Strategic Ltd</i>	<i>Finishing Publications Ltd</i>

<i>CTC The National Cycling Charity</i>	<i>First Plan</i>
<i>Cycling UK Stevenage</i>	<i>Fitness First Plc</i>
<i>Dacorum Borough Council</i>	<i>Friends of Forster Country</i>
<i>Datchworth Parish Council</i>	<i>Friends of the Earth (Luton)</i>
<i>Davies And Co</i>	<i>Friends Religious Society</i>
<i>Defence Infrastructure Organisation</i>	<i>Friends, Families and Travellers and Traveller Law Reform Project Community Base</i>
<i>Deloitte</i>	<i>Fusion</i>
<i>Department For Business, Innovation and Skills</i>	<i>Gabriel Securities Ltd</i>
<i>Department For Culture Media And Sport</i>	<i>Genesis Housing Group</i>
<i>Department For Environment Food And Rural Affairs</i>	<i>GHM Consultancy Group Ltd (Logic Homes)</i>
<i>Department For Transport Rail Group</i>	<i>Giles Junior School</i>
<i>Design Council</i>	<i>Giles School</i>
<i>Dixons Dispatch Ltd</i>	<i>Glanville</i>
<i>Douglas Drive Senior Citizens Association</i>	<i>Glasgow City Council</i>
<i>DPDS Consulting Group</i>	<i>GlaxoSmithKline</i>
<i>EADS Astrium</i>	<i>Government Equalities Office</i>
<i>East and North Herts Clinical Commissioning Group</i>	<i>Graveley Against SNAP Proposals (GASP)</i>
<i>East and North Herts NHS Trust</i>	<i>Graveley Parish Council</i>
<i>East Coast</i>	<i>Graveley School</i>
<i>East Hertfordshire District Council</i>	<i>Great Ashby Community Council</i>
<i>East Herts District Council</i>	<i>Great Ashby Community Group</i>
<i>East Herts Footpath Society</i>	<i>Great Ashby Community Resource Centre</i>
<i>East of England Ambulance Service</i>	<i>Greene King Plc</i>
<i>East Of England Local Government Association (formerly EERA)</i>	<i>Greenside School</i>
<i>Eastlake Stevenage Limited</i>	<i>Gregory Gray Associates</i>
<i>Endurance estates</i>	<i>Hanover Housing Association</i>
<i>Environment Agency</i>	<i>HAPAS</i>
<i>Epping Forest District Council</i>	<i>Heaton Planning Ltd</i>
<i>Essex County Council</i>	<i>Hermes Real Estate Investment Ltd</i>
<i>Executive</i>	<i>Hertford Road Community Association</i>
<i>F&amp;C REIT Asset Management</i>	<i>Hertfordshire Action on Disability</i>
<i>Fairlands Primary School And Nursery</i>	<i>Hertfordshire Association for the Care and Resettlement of Offenders</i>
<i>Fairlands Valley Sailing Centre</i>	<i>Hertfordshire Association Of Parish And Town Councils</i>
<i>Fairview Road Residents Association</i>	<i>Hertfordshire Association of Parish and Town Councils / Welwyn Hatfield Association of Local Councils</i>
<i>Featherstone Wood Primary School</i>	<i>Hertfordshire Association Of Young People</i>
<i>Fields in Trust</i>	<i>Hertfordshire Biological Records Centre</i>
<i>Hertfordshire Care Trust</i>	<i>Iceni Projects Ltd</i>
<i>Hertfordshire Chamber Of Commerce And Industry</i>	<i>Independent Custody Visitors Scheme</i>

<i>Hertfordshire Constabulary</i>	<i>Intercounty Properties</i>
<i>Hertfordshire County Council</i>	<i>J Young Investments Ltd.</i>
<i>Hertfordshire County Council (Archaeology)</i>	<i>JB Planning Associates</i>
<i>Hertfordshire County Council (Estates)</i>	<i>Jehovah's Witnesses</i>
<i>Hertfordshire County Council (Highways)</i>	<i>John Henry Newman RC School</i>
<i>Hertfordshire County Council Public Health</i>	<i>Jones Day</i>
<i>Hertfordshire Fire And Rescue Service</i>	<i>Jones Lang LaSalle</i>
<i>Hertfordshire Gardens Trust</i>	<i>Kirkwells</i>
<i>Hertfordshire Hearing Advisory Service</i>	<i>Knebworth Estates</i>
<i>Hertfordshire Highways</i>	<i>Knebworth House Education and Preservation Trust</i>
<i>Hertfordshire LEP</i>	<i>Knebworth Parish Council</i>
<i>Hertfordshire Police</i>	<i>Lambert Smith Hampton</i>
<i>Hertfordshire Police Authority</i>	<i>Lodge Farm Primary School</i>
<i>Hertfordshire Police Eastern Area</i>	<i>Lanes New Homes</i>
<i>Hertfordshire Property (HCC)</i>	<i>Langley Parish Meeting</i>
<i>Hertfordshire Society for the Blind</i>	<i>Larwood School</i>
<i>Hertfordshire Stop Smoking Service</i>	<i>Lepus Consulting</i>
<i>Hertfordshire University</i>	<i>Letchmore Infants And Nursery School</i>
<i>Hertfordshire Visual Arts Forum</i>	<i>Letchworth Garden City Heritage Foundation</i>
<i>Herts &amp; Middlesex Wildlife Trust</i>	<i>Leys Primary And Nursery School</i>
<i>Herts Against the Badger Cull</i>	<i>Lincolns Tyre Service Ltd.</i>
<i>Herts and Middlesex Wildlife Trust</i>	<i>Living Streets</i>
<i>Hertsmere Borough Council</i>	<i>London and Cambridge Properties Ltd</i>
<i>Hightown Praetorian Churches Housing Association</i>	<i>London Borough of Barnet</i>
<i>Highways England</i>	<i>London Borough of Enfield</i>
<i>Hill Residential Limited</i>	<i>London Borough of Harrow</i>
<i>HilliersHRW Solicitors LLP</i>	<i>London Gypsies and Travellers Unit</i>
<i>Historic England</i>	<i>Longmeadow Primary School</i>
<i>Hitchin Town Action Group</i>	<i>Lonsdale School</i>
<i>Holy Trinity Church</i>	<i>Luton Borough Council</i>
<i>Home Builders Federation</i>	<i>Marine Management Organisation</i>
<i>Homes And Communities Agency</i>	<i>Marriotts School</i>
<i>Howard Cottage Housing Association</i>	<i>Martin Ingram Opticians</i>
<i>Howard Property Group</i>	<i>Martins Wood Primary School</i>
<i>HSBC Trust Company (UK) Limited</i>	<i>Mayor of London</i>
<i>Hubert C Leach Ltd</i>	<i>MBDA UK Ltd</i>
<i>Mind in Herts</i>	<i>Pin Green Community Centre</i>
<i>MKG Motor Group</i>	<i>Pin Green Residents Association</i>
<i>Moss Bury Primary School</i>	<i>Pin Green Residents Group</i>
<i>MS Society Mid Hertfordshire</i>	<i>Planning Potential Ltd</i>
<i>NaCSBA</i>	<i>Planware Ltd</i>
<i>National Express</i>	<i>Planware Ltd.</i>
<i>National Housing Federation</i>	<i>POhWER</i>

<i>Natural England</i>	<i>Princes Trust</i>
<i>Network Rail</i>	<i>Putterills Of Hertfordshire</i>
<i>NFGLG</i>	<i>Rapleys LLP</i>
<i>NHS East and North Hertfordshire CCG</i>	<i>REACT</i>
<i>North Hertfordshire and Stevenage Green Party</i>	<i>Redrow Homes (Eastern) Ltd</i>
<i>North Hertfordshire College</i>	<i>Redrow Homes Eastern Division</i>
<i>North Hertfordshire District Council</i>	<i>Regional Land Holdings Ltd.</i>
<i>North Hertfordshire Friends Of The Earth</i>	<i>Relate North Hertfordshire And Stevenage</i>
<i>North Hertfordshire People First</i>	<i>Renshaw UK Limited</i>
<i>North Herts &amp; Stevenage Green Party</i>	<i>rg+p Ltd</i>
<i>North Herts and Stevenage Community Learning Disability Team</i>	<i>Richborough Estates</i>
<i>North Herts Homes</i>	<i>Ridgemoor Park Training Centre</i>
<i>North Herts People First</i>	<i>River Beane Restoration Association</i>
<i>North Stevenage Consortium</i>	<i>Road Haulage Association</i>
<i>Odyssey Group Holdings</i>	<i>Roebuck and Marymead Residents Association</i>
<i>Office for Rail Regulation</i>	<i>Roebuck Nursery And Primary School</i>
<i>Old Stevenage Community Association</i>	<i>Round Diamond Primary School</i>
<i>On Behalf Of St. Peter's Church</i>	<i>RPF Developments</i>
<i>Origin Housing Group</i>	<i>RPS Planning and Development Ltd</i>
<i>Oval Community Centre</i>	<i>RSPB</i>
<i>PACE</i>	<i>Sainsbury's Supermarkets Ltd</i>
<i>Paradigm Housing Group</i>	<i>Savills</i>
<i>Passenger Transport Unit, Hertfordshire County Council</i>	<i>Saving North Herts Green Belt</i>
<i>Patient Liaison Group</i>	<i>Secretary of State for Communities</i>
<i>Peacock And Smith</i>	<i>Seebohm Executors</i>
<i>Peartree Spring Junior School</i>	<i>Shephalbury Sports Academy</i>
<i>Pennyroyal Ltd.</i>	<i>Shephall Community Association</i>
<i>Pentangle Design</i>	<i>Shephall Residents Association</i>
<i>Persimmon Homes</i>	<i>Showmen's Guild Of Great Britain</i>
<i>PHD Associates</i>	<i>Simmons And Sons</i>
<i>Physically Handicapped And Able Bodied Club</i>	<i>South East Midlands Local Enterprise Partnership</i>
<i>Picture Ltd</i>	<i>Sport England</i>
<i>Pigeon Investment Management Ltd</i>	<i>Sport Stevenage</i>
<i>Pigeon Land Ltd</i>	<i>Springfield House Community Association</i>
<i>St Albans City And District Council</i>	<i>Thames Water Property</i>
<i>St Ippolyts Parish Council</i>	<i>The Baha'I Community of Stevenage</i>
<i>St Margaret Clitherow RC Primary School</i>	<i>The Campaign for Real Ale</i>
<i>St Nicholas Community Centre</i>	<i>The Coal Authority</i>
<i>St Nicholas School</i>	<i>The Greens &amp; Great Wymondley Residents Association</i>
<i>St Vincent De Paul RC Primary School</i>	<i>The Guinness Trust</i>
<i>St. Nicholas and Martins Wood Residents Association</i>	<i>The Guinness Partnership</i>



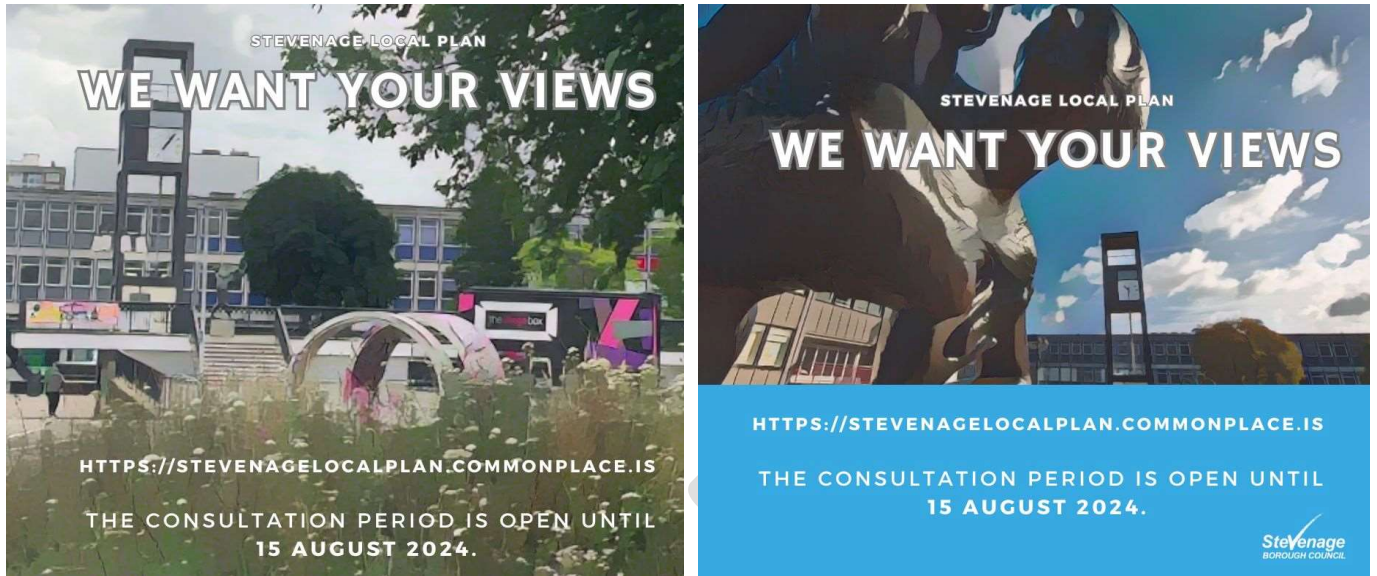
<i>Stanhope Plc</i>	<i>The Gypsy Council</i>
<i>STARCOURT CONSTRUCTION LTD</i>	<i>The Hitchin Forum</i>
<i>Stevenage And North Hertfordshire Indian Cultural Society</i>	<i>The Living Room</i>
<i>Stevenage and North Herts Women's Resource Centre</i>	<i>The National Trust</i>
<i>Stevenage Borough Council</i>	<i>The Nobel School</i>
<i>Stevenage Borough Council Transportation Development</i>	<i>The Salvation Army</i>
<i>Stevenage Business Initiative</i>	<i>The Theatres Trust</i>
<i>Stevenage Caribbean and African Association</i>	<i>The Woodland Trust</i>
<i>Stevenage Caribbean And African Association (SCARAFa)</i>	<i>Theatres Trust</i>
<i>Stevenage Cricket Club</i>	<i>Thomas Alleyne School</i>
<i>Stevenage CVS</i>	<i>T-Mobile</i>
<i>Stevenage Depression Alliance</i>	<i>TRACKS (Autism)</i>
<i>Stevenage Haven</i>	<i>Transport for London</i>
<i>Stevenage Irish Network</i>	<i>Trotts Hill Primary And Nursery School</i>
<i>Stevenage League Of Hospital Friends</i>	<i>Troy Planning</i>
<i>Stevenage Mosque</i>	<i>Turley</i>
<i>Stevenage Polish Association</i>	<i>Universities Superannuation Scheme Ltd</i>
<i>Stevenage Quakers</i>	<i>USF Nominees Ltd.</i>
<i>Stevenage Regeneration Ltd.</i>	<i>Veale Associates</i>
<i>Stevenage Sikh Cultural Association</i>	<i>Veolia Water Central (VWC)</i>
<i>Stevenage Town Rugby Club</i>	<i>VEOLIA WATER CENTRAL LIMITED</i>
<i>Stevenage Women's Refuge</i>	<i>Vincent And Gorbng Planning Associates</i>
<i>Stevenage World Forum For Ethnic Minorities</i>	<i>Virgin Media</i>
<i>Stevenage Youth Council</i>	<i>Visit East Anglia</i>
<i>Stewart Ross Associates</i>	<i>Vodafone Ltd</i>
<i>Strutt and Parker LLP</i>	<i>Waitrose Ltd</i>
<i>Symonds Green Community Association</i>	<i>Walkern Parish Council</i>
<i>Taylor Wimpey</i>	<i>Watford Borough Council</i>
<i>Taylor Wimpey / Persimmon</i>	<i>Welwyn Hatfield Borough Council</i>
<i>Terence O'Rourke Ltd</i>	<i>Welwyn Hatfield Council</i>
<i>Thames Water</i>	<i>West Stevenage Consortium</i>
<i>Wheatley Homes Ltd</i>	<i>Weston Parish Council</i>
<i>Willmott Dixon Housing</i>	<i>Wheatley Homes</i>
<i>Wm Morrisons Supermarket Plc</i>	<i>Woolmer Green Parish Council</i>
<i>Women's Link</i>	<i>WPNPF</i>
<i>Woodland Trust</i>	<i>Wymondley Parish Council</i>
<i>Woolenwich Infant And Nursery School</i>	<i>Wyvale Garden Centres Ltd</i>
	<i>Youth Council</i>

*Approximately 600 individuals on the Council consultation register were also consulted.*

## Appendix 3 – Consultation Publicity

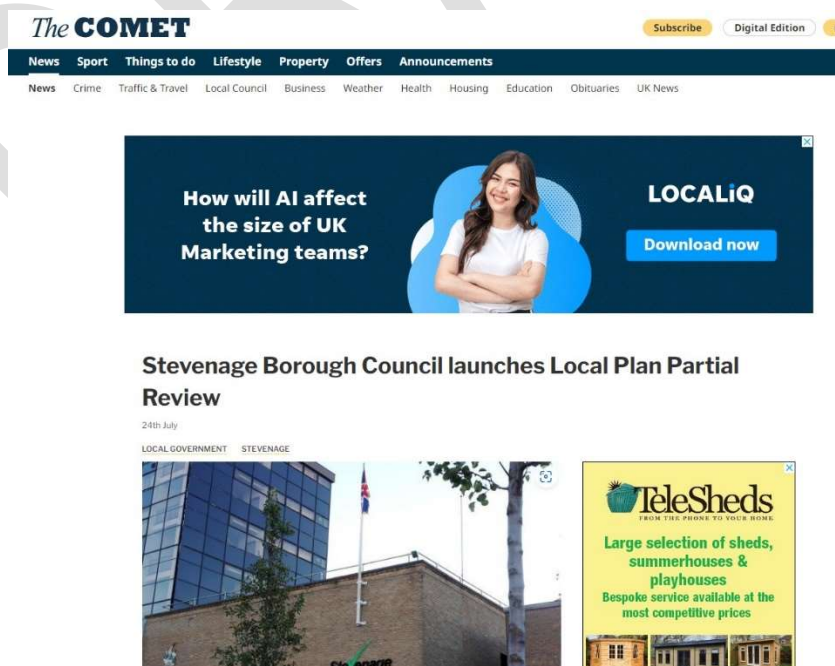
### Facebook / Twitter/ Instagram posts

Example of social media posts to promote the consultation.



## The Comet

News article placed in The Comet newspaper to promote the consultation.



## The Chronicle

News article placed in The Chronicle newsletter to promote the consultation.

The magazine for Stevenage people

# Local Plan Consultation

Stevenage Borough's Local Plan (adopted May 2019) is undergoing a partial review and update and we are seeking your views on the changes. The consultation runs from 5 July to 15 August 2024.



The Local Plan is the town's spatial development strategy which plans to 2031. It identifies the main issues that are likely to affect Stevenage and sets policies to deal with them, setting out the rules for how development is carried out. It is important to remember that the Local Plan Review, at this stage, consists of limited changes. As such, the scope of the review to policies and supporting text is limited to necessary changes only, related to key drivers of change since the Plan was adopted in 2019. Other wider changes will

be considered for the next stage of the Local Plan Review, a Full Review of the Plan, from 2025 onwards.

Anyone in Stevenage's community, including residents, workers, businesses, community organisations or visitors can comment on the changes we are proposing.

All information and your chance to respond, can be found here: <https://stevenagelocalplan.commonplace.is/>



## *Appendix 4 – Example of letter and email*

# **Local Plan Partial Review and Update – Regulation 18 Public Consultation**

Dear Consultee,

We want your views on our Stevenage Local Plan, a planning document that will help to shape the future of the Stevenage. This is a partial review of the Local Plan, and we are consulting on the proposed changes only.

**The Consultation period runs from 5 July 2024 to 15 August 2024**

All information regarding the consultation can be found on our consultation website here:

<https://stevenagelocalplan.commonplace.is/>

Or use the QR code below:



### **What is the Local Plan?**

The Stevenage Borough Local Plan was adopted on 22 May 2019. The Plan sets out a spatial vision for the town to 2031 and contains detailed land use policies for the Borough. It looks to guide development and covers areas like housing, the built and natural environment, infrastructure, businesses, open spaces and more.

Tackling the Climate Emergency is an issue we are deeply committed to addressing. This means we are consulting on a **partial update of our Local Plan** to make sure that we are thinking sustainably for the next, and future generations. The aim of this review is to not replace the existing Plan with an entirely new plan, instead focus on areas that we feel need urgent attention.

Regulation 18 is a legal term for a formal consultation. We'll need to go out for a 'Regulation 18' consultation on the draft amendments to Stevenage's Local Plan (or Development Plan Document or 'DPD'). This is a statutory part of the planning process, that has to be carried out by law.

## **How to respond**

The Local Plan revised version and other relevant documentation can be downloaded from our consultation website:

<https://stevenagelocalplan.commonplace.is/>

Responses can be submitted via the website and we welcome your views on as many (or few) questions as you like!

Hard copies of the documents are available to view at the Council Offices at Daneshill House, the Stevenage Central Library and also the Stevenage Old Town Library.

If you need any further help with consultation, please email us at the address below.

If you do not wish to receive future consultations via email or would like to update your contact details, please let us know.

We look forward to hearing from you.

Kind Regards

Planning Policy Team

**Stevenage Borough Council | Daneshill House,  
Danestrete, Stevenage, Herts SG1 1HN**

[planning.policy\\_SBC@stevenage.gov.uk](mailto:planning.policy_SBC@stevenage.gov.uk)

## Appendix 5 – Response form

Example of a response form to allow consultees to respond via alternatives method.

<p><b>Response Form – Local Plan Review: Regulation 18 Consultation</b></p> <p><b>Six-week consultation from 5 July to 15 August 2024</b></p> <p>The Council is undertaking a Review of the Local Plan adopted on 22 May 2019. The Plan is the key planning policy document setting a vision for the future development of Stevenage. It looks to guide development and covers areas like housing, infrastructure, businesses, open spaces and more.</p> <p><b>Draft Plan Consultation</b></p> <p>This is a draft version of our Plan for Stevenage, which we will formally consult on. We will ask for comments and feedback from the community and stakeholders. This consultation is a legal requirement, and the consultation will last for 6 weeks. (This consultation is known as 'Regulation 18' in the planning world)</p> <p><b>How to respond</b></p> <p><b>Online:</b> You can respond on-line, read all supporting documents and helpful guides by going to our consultation website: <a href="https://stevenagelocalplan.commonplace.is/">https://stevenagelocalplan.commonplace.is/</a></p> <p><b>Email:</b> Please send your comments to the Planning Policy Team directly on: <a href="mailto:planningpolicy@stevenage.gov.uk">planningpolicy@stevenage.gov.uk</a>. Please ensure you state 'Reg 18 Consultation Response' in the subject line.</p> <p><b>Post:</b> Complete this response form and post it to:</p> <p>Planning Policy Consultation Planning &amp; Regulation Stevenage Borough Council Daneshill House Danesstretre Stevenage Herts SG1 1HN</p> <p><b>Personal/Contact Details</b></p> <p><i>Please note that if you respond to this consultation your response will be publicly available. This will include your name, who you represent and the company/organisation but not personal contact details such as address or email.</i></p>	<table border="1"> <tr> <td>Your Name</td> <td></td> </tr> <tr> <td>Address</td> <td></td> </tr> <tr> <td>Company/Organisation</td> <td></td> </tr> <tr> <td>Representing (e.g. - Self/ client name or organisation)</td> <td></td> </tr> <tr> <td>Email:</td> <td></td> </tr> </table> <p>Would you like to receive email communications about planning policy consultations in the future?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p style="text-align: center;">2</p>	Your Name		Address		Company/Organisation		Representing (e.g. - Self/ client name or organisation)		Email:	
Your Name											
Address											
Company/Organisation											
Representing (e.g. - Self/ client name or organisation)											
Email:											
<p><b>Strategic and detailed Climate Change</b></p> <p>Climate Change policies will be placed at the top of our Strategic Planning Policies (see pages 32 -33 of the revised Local Plan). We are seeking to get the right balance of new low carbon homes and investment in retrofitting existing homes, alongside new jobs, infrastructure while protecting our green and cultural assets, echoing the TCPA Garden City principles that the original new town was founded on.</p> <p><b>New Policy SP1:</b></p> <p>The change will be:</p> <p>Deletion of existing Policy SP1: Presumption in favour of sustainable development and replacement with new Policy SP1: Climate change to reflect the changed priority for the Local Plan to address climate change issues and challenges.</p> <p>The revised policy can be found on Pages 32 - 33 of the Regulation 18 Local Plan.</p> <p><b>What are your comments on the revised policy?</b></p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div> <p style="text-align: center;">3</p>	<p><b>Policy CC4: Energy infrastructure</b></p> <p>Development proposals which create, utilise, or facilitate connection to decentralised energy networks (DENs) or district heat networks (DHNs) will be strongly supported.</p> <p>The use of ultra-low and zero carbon combined heat and power (CHP) systems will also be strongly supported.</p> <p>Developments that produce local ultra-low and zero carbon renewable energy with surplus injected into the grid will be strongly supported.</p> <p>The implementation of Intelligent Energy Systems (IES) is strongly encouraged.</p> <p><b>What are your comments on the Energy infrastructure policy?</b></p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div> <p><b>Policy CC5: Carbon sinks</b></p> <p>Development proposals should not result in the loss or deterioration of existing carbon sinks. Development proposals which deliver net gains in carbon sequestration and storage through the enhancement of existing carbon sinks or the provision of new carbon sinks will be strongly supported.</p> <p><b>What are your comments on the Carbon sinks policy?</b></p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div> <p style="text-align: center;">6</p>										

## Appendix 6 – Local Plan Partial Review Booklet

Example to show a few pages from the Local Plan Booklet which was produced to help consultees understand the process of a Local Plan Partial Review.

