

Standing up for Hertfordshire's countryside

Stevenage Local Plan Representation Form – Jan 2016

Please complete a separate form for each representation you wish to make.

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

Paragraph8.4 & 8.11 – 8.13..... (please specify)

PolicyIT1 & IT2..... (please specify)

Proposals Map

2. Do you consider the Local Plan has been prepared in accordance with the Duty to Cooperate? (please select one answer)

No

Yes

3. Do you consider the Local Plan has met the legal requirements? (please select one answer)

No

Yes

4. Do you consider the Local Plan has met the procedural requirements? (please select one answer)

No

Yes

5. Do you consider the Local Plan is sound? (please select one answer)

No (if no go to question 6) ✓

Yes (if yes go to question 7)

6. If no, do you consider the Local Plan is unsound because it is: (please select all that apply)

Not positively prepared

Not Justified ✓

Not Effective ✓

Inconsistent with national policy ✓

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

CPRE Hertfordshire objects to the references in Policy IT1 and IT2 to potential proposals for development and Planning policy outside the Plan area north and west of Stevenage, that are expected to be highly controversial and currently speculative. Reliance on such development in advance of any approved development plan policy is unjustified, contrary to national policy, and likely to be ineffective.

Prevention of development that would otherwise be acceptable as proposed in the second sentence of Policy IT2 when there is no approved Policy for the development speculated by the Council, is neither justified nor effective. Procedurally, in the event that such proposals were included in the adopted North Herts Local Plan, the two Councils could prepare a joint Action Area Plan to determine how proposals should be planned in detail.

Promoting a preferred road alignment outside the Plan area in paragraph 8.4 causes unacceptable concern to the community that would be affected, and is a matter that should be resolved through the North Herts Local Plan, not the Stevenage Plan.

Similar objections apply to the text in paragraphs 8.11 to 8.13. 8.11 incorrectly states that the emerging North Herts '*safeguards land to the west of Stevenage to meet the long-term needs of the town*'. The Pre-submission North Herts Local Plan has yet to be published and any such proposal would be strongly opposed on Green Belt and other Planning grounds. Proposals in the Stevenage Plan should be prepared and considered in terms of their viability and practicality for implementation without recourse to land outside the Plan area over which Stevenage Council has no jurisdiction.

No acceptable justification for the inclusion of sites and land outside the Borough is provided, only aspirational statements in paragraphs 8.11 to 8.13 that have no development plan basis, and no demonstration that exceptional circumstances exist for the development of Green Belt land contrary to National Planning Policy that would result if they came to fruition.

- 8. Please set out what change(s) you consider necessary to make the Local Plan in accordance with the Duty to Cooperate, meet the procedural and legal requirements, or sound, having regard to the test you have**

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

Policies IT1 and IT2 and the text in Chapter 8 should be amended to delete all references to development of land beyond the Borough boundary that does not have planning permission or is the subject of a proposal in an adopted or deposited Local Plan.

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

Yes, I wish to participate at the oral examination

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