

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?**

*Paragraph ..... (please specify)*  
*Policy .....SP7..... (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 proposal in Policy SP7 to provide at least 7,600 new homes between 2011 and 2031 if this would require the removal of large areas of land from the Green Belt to the north and south east of the town, and to the identification of those two areas as broad locations for development in the Plan.

CPRE Hertfordshire considers that these elements of the Policy and associated text in the Plan are unjustified, and contrary to national policy.

The first sentence of paragraph 5.66 in particular fails to note the specific requirement of paragraph 14 of the NPPF to seek to meet objectively assessed housing 'need unless other policies indicate development should be restricted'. Despite noting this requirement in its background document on Housing numbers, neither the Plan in paragraph 5.67, nor any evidence document sets out a justified explanation of how the Council has met its obligation to balance Housing Need with Constraints as set out in the NPPF, stating only that it has set a Housing target that meets those needs in full.

This is a fundamental flaw in the Plan that renders it unsound as currently drafted, and on which CPRE Hertfordshire wishes to participate in the Local Plan Examination.

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

Policy SP7 and the related text in Chapter 5, particularly paragraphs 5.66 and 5.67 should be amended to include a more accurate summary of the national Planning Policy context; a lower Housing Target that avoids the need for removal of land from the Green Belt north and south east of the town; and a brief explanation of the balancing exercise that has led to the identification of a justified Housing Target.

**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*

**Name:** Mr Steve Baker, Planning Manager  
**Organisation:** CPRE Hertfordshire  
**Address:** 31a Church Street, Welwyn, Herts. AL6 9LW  
**Tel:** 01438 717587  
**Email:** office@cpreherts.org.uk