

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 .....SP10..... (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.**

Policy SP10 on the Green Belt is unsound in relying on the development of land outside the Plan area that does not have planning permission and has not been formally proposed for development in a Local Plan. In this respect part 'b' of the Policy is ineffective.

Part 'a' of the Policy is also unsound because there is insufficient justification for the redrawing of already defensible, established, Green Belt boundaries to accommodate development as proposed by the Council. CPRE Hertfordshire also considers that these elements of the Policy and associated text in the Plan are contrary to national policy as set out in the NPPF.

The NPPF points out that exceptional circumstances must be demonstrated in order to allow land to be taken out of the Green Belt through a Local Plan, and this has not been done in respect of the five 'parcels' of Green Belt land listed in Paragraph 5.129. CPRE Hertfordshire strongly disputes the statement at paragraph 5.124, that this land can be released for development '*without damage to the overall purpose of the Green Belt in this location.*'

This mistaken conclusion is compounded by paragraph 5.127 claiming that the Council's evidence demonstrates that the release of sites from the Green Belt '*will not harm the overall purposes of the Green Belt in this area.*' This is a major flaw in the reasoning set out in the Plan, apparently based on advice which fails to fully reflect the five principal purposes of the Green Belt, perhaps because of the way it has been applied. The consequence is that this part of the Plan is rendered unsound as currently drafted.

- 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 SP10 should be amended to remove part 'b' entirely; and  
To delete the final sentence of part 'a' and its references to land removed and added to  
the Green Belt.

The related text in Chapter 5, particularly paragraphs 5.124 and 5.127 should be  
amended to acknowledge the detrimental impact that removal of land from the Green Belt  
will have on Green Belt purposes, in the light of final decisions on any areas removed  
from the Green Belt as a result of the Inspector's recommendations.

The references to specific areas of land to be removed from the Green Belt should be  
deleted from paragraph 5.128 in terms of land area, and paragraph 5.129 in its entirety.

**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