

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)
PolicyGB2..... (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 GB2 on Green Belt settlements is unsound, because, as currently worded, it conflicts with NPPF policy for protection of the Green Belt. The only exceptions that would normally allow inappropriate housing in the Green Belt, relate to rural exception sites for affordable housing. In this respect the second part of criterion 'a' of the Policy is unjustified, ineffective and contrary to National Planning Policy. It is noted that Stevenage is not proposing a Rural Housing Need policy in the Plan.

Paragraph 12.4 of the Plan summarises relevant NPPF policy on this matter, and the final sentence of paragraph 12.5 is reasonable, but this is not what the second clause in 'a' of Policy GB2 would allow. The wording is therefore unjustified, contrary to the NPPF, and would be ineffective in protecting the Green Belt from inappropriate development at Norton Green and Todd's Green.

In the opinion of CPRE Hertfordshire, the other criteria in proposed Policy GB2 would not prevent developments of up to five dwellings in the Green Belt that would be allowed under part 'a' of the policy as currently worded.

Similarly the second paragraph of Policy GB2 fails to require that in redeveloping previously developed land in the Green Belt, this should be subject to the proposal not having a greater impact on the openness of the Green Belt in order to be consistent with national policy.

Finally, the wording of the final paragraph of the Policy is ambiguous as worded, implying that there are exceptions in the NPPF to '*inappropriate development that will not be permitted*'. The text should be amended to avoid confusion.

- 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 either delete the words '*or it does not create more than 5 additional dwellings*'. Alternatively the replacement of the word 'or' with 'and' would also make the wording consistent with the NPPF.

The words '*and there being no greater impact on the openness of the Green Belt*' at the end of the second paragraph of the Policy, after '*...subject to conditions b. to d. being met*'.

The final paragraph of Policy GB2 should be amended to read '*Paragraphs 89 and 90 of the NPPF set out various categories of development that are not normally 'inappropriate' in the Green Belt*'.

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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