The Planning Inspectorate

The Stevenage Local Plan 2011-2031 Partial Update Examination

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https://www.hwa.uk.com/projects/stevenage-local-plan-partial-update

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Scope of the Examination

The Stevenage Borough Local Plan 2011-2031 was adopted in May 2019 (the adopted Plan) (CD1).

Stevenage Borough Council (the Council) undertook a formal review of the adopted Plan, as required by Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the Regulations) and concluded that only parts of the adopted Plan required updating at that time and thus only a partial update to the adopted Plan was required. The Council's process for reaching this decision is summarised in a briefing note available on the Examination Website (CD16).

The Council therefore undertook a consultation under Regulation 19 of the Regulations in November 2024 on a schedule of changes it proposed to make to update the adopted Plan (Partial Update of the Stevenage Borough Local Plan 2011-2031 Schedule of Changes from Regulation 18 to Regulation 19) (CD2c), in other words the Council's proposed partial update.

However, the Council undertook a further consultation under Regulation 19 of the Regulations in August 2025 on an addendum which effectively set out a small number of further changes, superseding some of the changes detailed in CD2c (Partial Update of the Stevenage Borough Local Plan 2011-2031 Schedule of Changes from Regulation 19 to Pre Submission) (CD2b).

For the avoidance of any doubt, I am examining the partial update to the adopted Plan. This means I am examining the changes proposed in CD2c except where they have been superseded by the changes proposed in CD2b. I am not examining any elements of the adopted Plan which are not being updated or in other words sections

of the adopted Plan which are not identified in CD2c or CD2b as subject to changes. Sections of the adopted Plan which would be unchanged by the partial update are outside of the scope of my examination.

The Council has produced a consolidated document (Partial Update of the Stevenage Borough Local Plan 2011-2031 Schedule of Changes from Adopted Local Plan to Submission Version – Changes since Adoption of Local Plan in May 2019) (CD3) which simply combines CD2c and CD2b and is intended to assist the Examination. Thus, when I refer to the partial update, I am referring to both CD2c and CD2b, but for ease of referencing, I will use the reference numbers of the changes as identified in CD3 except where I explicitly indicate otherwise.

Introduction to Matters Issues and Questions (MIQs)

Following my initial review of the supporting evidence for and representations on the partial update (CD2c and CD2b as represented by CD3) to the adopted Plan (CD1), I set out below my MIQs for the Examination hearing sessions.

The Plan is being examined under the December 2023 National Planning Policy Framework. This is because the Implementation Annex to the latest December 2024 National Planning Policy Framework includes transitional arrangements which are applicable to this Examination. The transitional arrangements apply because the partial update was consulted on under Regulation 19 of the Regulations before 12 March 2025 and includes a draft housing requirement which is more than 80% of local housing need calculated according to the revised standard method published in December 2024. However, having read the representations, I note there are some comments on this, so I have therefore asked a question on it under Matter 1 to consider any alternative views.

When responding to the MIQs, please consider whether the changes proposed in the partial update to the adopted Plan are sound or need to be modified to take account of the tests of soundness set out in paragraph 35 of the National Planning Policy Framework December 2023 (NPPF). If you think a proposed change to the adopted Plan is unsound, please say why each change proposed in the partial update to the Plan as submitted is unsound or not legally compliant and how you would wish it to be changed to make it sound or legally compliant.

It is important to note that the MIQs have arisen from my initial assessment of the submission documents and representations, and may evolve through the Examination, not least following on from any responses the Council or others make on these matters prior to the hearing sessions.

These MIQs should be read alongside my Inspector Guidance Notes. I have also produced a Provisional Hearings Programme for the hearing sessions which are scheduled to take place in **the Autun Room, Daneshill House, Stevenage Borough Council** commencing at **0930 on Tuesday 2 December 2025.**

All those who wish to speak (participate) at the Hearing sessions should confirm this in writing with the Programme Officer by **1700 on Friday 31 October 2025**. The deadline for receipt of written statements for ALL Matters to be considered at the hearing sessions is **1700 on Friday 21 November 2025**.

The deadline for Statements of Common Ground is **1700 on 14 November 2025**. Please, see my Inspector Guidance Notes and Provisional Hearings Programme for further information.

L Fleming

INSPECTOR

MATTERS, ISSUES AND QUESTIONS

Matter 1 - Scope, Legal and Procedural Requirements

Matter 1 Issue 1 - The National Planning Policy Framework Transitional arrangements and whether the scope and role of the Plan are sufficiently clear to be effective?

Q1. Would it be inconsistent with national policy to examine the Plan against the December 2023 NPPF having regard to the transitional arrangements set out in paragraphs 234 to 237 of the December 2024 NPPF?

Q2. Is the fact that the adopted Plan has been subject to a review and subject to only a partial update clearly articulated in the proposed changes set out in CD3?

Q3. Should additional text be added to the adopted Plan for effectiveness to make it explicitly clear which parts of the adopted Plan have been updated since adoption and which parts have not?

Q4. The partial update to the Plan introduces a new strategic policy and amends a number of other strategic policies of the adopted Plan. The new strategic policy and amended strategic policies would only cover the period up to 2031 whereas the NPPF says strategic policies should cover a period of 15 years from adoption, is this approach justified and consistent with national policy?

Matter 1, Issue 2 - Whether the Council has complied with the duty to co-operate in the preparation of the Plan?

Q1. Have all relevant Statements of Common Ground been completed? Are any further updates or Statements of Common Ground outstanding? Have any concerns that have been raised in the representations in terms of compliance with the duty to co-operate now been fully addressed?

Matter 1, Issue 3 - Whether the Sustainability Appraisal (SA) complies with the requirements of the 2004 Act, the Strategic Environmental Assessment Directive (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)?

Q1. Is the approach to SA compliant with the SEA Regulations and the advice set out in the PPG[1] and based on an appropriate methodology?

Q2. Are the reasonable alternatives considered by the SA sufficiently distinct to highlight the different sustainability implications of each?

Matter 1, Issue 4 - Whether the Plan is supported by a robust approach to Habitats Regulation Assessment (HRA)?

[1] Strategic environmental assessment and sustainability appraisal

Q1. Is the HRA adequate and how has the partial update to the adopted Plan taken account of its findings?

Matter 1, Issue 5 - Whether the Plan has been prepared in accordance with other legal requirements?

Q1 Has the consultation on the partial update to the adopted Plan been carried out in accordance with the Statement(s) of Community Involvement? Have the publication, advertisement and availability of the Plan followed the procedures set out in the 2004 Act and 2012 Regulations?

Q2. Does the scope of the partial update to the adopted Plan under examination accord with the description given in the Local Development Scheme and has it followed the relevant timetable?

Q3. To what extent does the development plan (taken as a whole) contain policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change? Which policies specifically?

Q4. Has the partial update to the adopted Plan been informed by a robust assessment of its potential equality impacts and how have equality issues been addressed in the partial update to the adopted Plan? Which policies specifically?

Matter 2 - Climate Change and Sustainable Development

Matter 2, Issue 1 - Whether new and replacement policies on Sustainable Development and Climate Change are justified, effective, consistent with national policy and positively prepared?

Q1. Is Strategic Policy SP1 Climate Change, which replaces Strategic Policy SP1: Presumption in favour of sustainable development sound?

a. Is it consistent with national policy and supported by local evidence?
b. Is 5.1H clear in what an “acceptable contribution” is, particularly in how a decision maker or developer should react?
c. Are carbon sinks and significant carbon sinks accurately defined in this policy or its reasoned justification text?

Q2. Are the proposed changes which update Strategic Policy SP2 Sustainable Development sound?

a. Why is there a specific need to reference the needs of an ageing population when the policy already refers to all sectors of the community?

Q3. Is new Policy CC1 Energy Efficiency sound?

a. Is it consistent with paragraph 159 b) of the NPPF?
b. Is the Council’s approach supported by a well reasoned and robustly costed rationale and would this policy risk prejudicing the delivery of development in the Borough?

c. All major development must achieve net zero regulated operational emissions, is this approach justified?
d. Large scale major development of more than 150 dwellings or over 15,000m2 of non-residential floorspace is expected to be whole-life zero carbon, is “whole-life” justified and consistent with national policy?
e. Is all the terminology used in this policy clearly defined?
f. The changes proposed to the adopted Plan’s glossary state that the regulated operation emissions rate will be determined using the Standard Assessment Procedure, should this also refer to the Target Emissions Rate?

Q4. Is new Policy CC2 Overheating and cooling sound?

a. Does this policy only apply to major development?
b. Is this policy seeking to address a particular issue facing the Borough?
c. Have the implications of this policy been adequately factored into the Council’s viability assessment.

Q5. Is new Policy CC3 Water Efficiency sound?

a. Is water neutrality accurately defined in the justification text?
b. Is the requirement for rainwater harvesting mandatory even if the 110 litres of water consumption standard can be met without incorporating rainwater harvesting and is the approach to rainwater harvesting justified and consistent with national policy?
c. Has the cost of rainwater harvesting and achieving the 110 litre standard been adequately considered in the Council’s viability assessment?
d. Have the Environment Agency’s comments been adequately addressed, particularly, was the use of the BREEAM rating of ‘excellent (or equivalent) considered?

Q6. Is new Policy CC4 Energy Infrastructure sound?

a. Is it clear how a decision maker or developer should react to this policy?
b. Have the implications of this policy been adequately factored into the Council’s viability assessment

Q7. Is new Policy CC5 Carbon sinks sound?

a. Are carbon sinks clearly defined?
b. Is it clear what constitutes a significant carbon sink?
c. What is meant by deterioration and how would compliance be demonstrated and assessed?
d. Can enhancements be made to any carbon sink - would it need to be a significant carbon sink which is being enhanced?
e. Have the implications of this policy been adequately factored into the Council’s viability assessment?

Q8. Is new Policy CC6 Green roofs and walls sound?

a. Should this policy recognise that green roofs and walls may not always be the most effective way of achieving their intended benefits?

b. Have the implications of this policy been adequately factored into the Council's viability assessment?

Q9. Is new Policy CC7 Green economy sound?

a. Is there a specific need to make reference to the use of secondary and recycled aggregates in construction?
b. Have the implications of this policy been adequately factored into the Council's viability assessment?

Matter 3 - Housing and Design

Matter 3, Issue 1 - Whether the updates proposed to the adopted Plan housing and design policies and new policies on housing and design are justified, effective, consistent with national policy and positively prepared?

Q1. The Housing Technical Note (EB3.1) says, of the 7,600 homes required between 2011/12 and 2030/31 (the adopted Plan period), 2,644 homes were completed between 2011/12 and 2023/24. This leaves 4,956 required between 2024/25 and 2030/2031 (7 years) or 708 dwellings per annum. The partial update simply seeks for these figures to be incorporated into Strategic Policy SP7 High Quality Homes of the adopted Plan and the justification text and removes the housing distribution figures for the Borough, is this approach sound?

a. Are completion figures available for 2024/2025 and should the figures be adjusted to reflect them?
b. What is the justification for removing the housing distribution figures for the Borough?

Q2. What is the aim of the changes to references to sites and land supply in paragraphs 5.73 to 5.76, 5.81 and 5.86 and are these changes consistent with national policy?

Q3. Are the changes proposed to adopted Plan Policy HO1 Housing Allocations necessary, particularly, why is there a need to remove reference to sites capable of accommodating five dwellings?

Q4. Are the proposed changes to adopted Plan Policy HO7 Affordable Housing Targets sound?

a. Is the proposed increase in the affordable housing requirement on greenfield sites from 30% to 40% justified and does the Council's viability evidence demonstrate it will not prejudice the delivery of development?
b. Is there any evidence to indicate that specialist housing for older people should be exempt from meeting the affordable housing requirements?

Q5. Are the changes proposed to adopted Plan Policy HO10 Sheltered and Supported Housing sound?

a. Is the additional wording which requires compliance with other development plan policies effective?
b. Would the amended policy be positively prepared?

Q6. Are the changes proposed to adopted Plan Policy HO11 Adaptable and Accessible Housing sound?

a. Are the requirements for 10% of dwellings within major residential development to comply with M (3)(2)(b) for wheelchair user dwellings and 40% to comply with M4(2) for accessible and adaptable dwellings justified, particularly, what specific local evidence is there that demonstrates there is a local need for these requirements[1] and how and by whom will they be delivered?
b. Have the proposed updates to this policy been adequately accounted for in the Council's viability assessment and would they risk prejudicing the delivery of development in the Borough?

Q7. Are the proposed changes to adopted Plan Policy SP8 Good Design sound, particularly, what local evidence is there to support the implementation of the nationally described space standard to address particular issues faced by the Borough?

Q8. Is new Policy GD2 Design Certification sound, is it clear how a decision maker and developer should react to this policy?

Q9. Is new Policy HO14 Houses in Multiple Occupation sound?

a. How should a developer demonstrate an acceptable impact on housing supply and what would be an unacceptable impact?
b. Is it necessary to require compliance with other policies in the development plan?
c. How would a disproportionate impact on issues such as noise, parking and anti-social behaviour be assessed and measured?

Matter 4 - Employment, Town Centres and Opportunity Areas

Matter 4, Issue 1 - Whether the updates to policies and reasoned justification text related to employment are justified, effective, consistent with national policy and positively prepared?

Q1. The partial update proposes a number of changes to the adopted Plan Strategic Policy SP3 A strong and competitive economy, to reflect the Use Classes Order, including a definition for "employment uses" defining them as uses falling within classes B2, B8 and E(g). Is this approach sound?

[1] Planning Practice Guidance: Housing: optional technical standards Paragraph: 007 Reference ID: 56-007-20150327 (Revision date: 27 03 2015)

Q2 Are the changes proposed to adopted Plan Policy EC1 Allocated Sites for employment sound, particularly, should the target floorspace figures reflect the latest evidence as set out in the Employment Technical Paper (EB3.3)?

Q3. Why is it necessary to delete criterion c) and d) from adopted Plan Policy EC7 Employment development on allocated sites and what justification is there to demonstrate the period of 6 months is appropriate?

Matter 4, Issue 2 - Whether the updates to policies and reasoned justification text related to Town Centres are justified, effective, consistent with national policy and positively prepared?

Q1. The partial update proposes a number of changes to the adopted Plan Strategic Policy SP4 A vital town centre, Policy HC1 District, Local and Neighbourhood Centres, Policy HC2 Local Shops, Policy HC3 The Health Campus, Policy HC5 New Health Social and Community Facilities to reflect the Use Classes Order is this approach sound?

a. Is the commitment to reviewing retail and town centre policies as part of a full review of the adopted Local Plan in new justification text to Policy SP3 necessary and justified?
b. Is the specification of a period of 6 months for marketing or vacancy in Policies HC1 and HC2 justified?

Q2. Are the updates to the adopted Plan Policy TC8 Town Centre Shopping Area (TCSA) sound?

a. Is the deletion of the text “subject to the above criteria, the redevelopment of existing premises will be permitted within the TCSA where this would not cause harm to the Town Square Conservation Area“ justified?
b. Would the amended policy adequately reference the relationship with the Town Square Conservation Area and other designated heritage assets within and around the TCSA?

Q3. Are the updates to the adopted Plan Policy TC9 Old Town Shopping Area sound?

a. Is the deletion of criterion b justified?

Matter 4, Issue 3 - Whether the approach to the Station Gateway Major Opportunity Area and other opportunity areas is legally compliant, justified, effective, consistent with national policy and positively prepared?

Q1. Are the updates to adopted Plan Policies TC2 Southgate Park Major Opportunity Area, TC3 Centre West Major Opportunity Area TC5 Central Core Opportunity Area, TC6 Northgate Major Opportunity Area, TC7 Marshgate Major Opportunity Area which are mainly intended to reflect the Use Classes Order sound?

Q2. Are the updates to the adopted Plan Policy TC4: Station Gateway Major Opportunity Area sound?

a. Are the updates consistent with the Stevenage Station Gateway Area Action Plan Preferred Options Report (EB2.15), where there are any conflicts what is the justification for the approach proposed in the partial update?
b. Is the deletion of the text "celebrate the heritage of the town justified"?
c. Should principle iv) refer to equivalent or better provision and should it specify when new provision should be made?

Matter 5 - Infrastructure, Transport, Flood Risk, Drainage and Trees

Matter 5, Issue 1 – Whether the updates to policies and reasoned justification text related to the Infrastructure, Transport, Flood Risk, Drainage and Trees are justified, effective, consistent with national policy and positively prepared?

Q1. Are the changes proposed to Strategic Policy SP5 Infrastructure necessary? What specifically do they seek to achieve?

Q2. Are the updates to the adopted Plan Strategic Policy SP6 Transport sound?

a. Is it clear how a developer and decision maker should react to part f. particularly, how will accessibility be assessed and demonstrated?
b. What is a location with good accessibility, how is this defined?
c. Is the relationship with the Council's supplementary planning documents clear and justified given these documents do not form part of the development plan?
d. Has the new bus terminal and waiting facilities referred to in criterion e) iv) of the update to the Policy already been delivered and is this text therefore ineffective?

Q3. Are the changes proposed to adopted Plan Policy IT1 Strategic development access points sound?

a. Are the highway safety implications of cycle safety at junctions adequately accounted for?
b. Are the highway safety implications of horses and horse riding routes adequately accounted for?

Q4. Is further reasoned justification text necessary to explain how a decision maker should react to the updated adopted Plan Policy IT4 Transport Assessments and Travel Plans, particularly, what are unacceptable impacts and what are the relevant thresholds?

Q5. Do the changes proposed to adopted Plan Policy IT5 Parking and Access effect how the policy is currently applied in any way?

Q6. Is new Policy FP1 Sustainable Drainage which replaces Policy FP1: Climate Change sound?

a. Should this policy be supported by more up to date flood risk and drainage evidence?

b. Does this policy account for situations where clear evidence demonstrates the incorporation of sustainable drainage systems may be inappropriate as per paragraph 173 c) of the NPPF?

Q7. Is new Policy FP2 Flood Risk Management which replaces Policy FP2 Flood Risk in Flood Zone 1 and Policy FP3 Flood Risk in Flood Zones 2 and 3 sound?

a. Should this policy be supported by more up to date flood risk and drainage evidence and if not, should the reasoned justification recognise the need for the Council's evidence to be updated to reflect the comments made by the Environment Agency and assist developers in reacting to this policy?

Q8. Are new Policies NH5a Trees and Woodland and NH5b Tree-lined streets which replace Policy NH5 Trees and Woodland sound?

a. Are the requirements of Policy NH5a too onerous and do they in part duplicate and conflict with national policy particularly paragraph 186 of the NPPF in relation to veteran trees?
b. Is it clear what constitutes a street for the purposes of applying Policy NH5b?

Matter 6 – Monitoring and Review

Matter 6, Issue 1 – Whether the updates to the adopted Plan would be able to be monitored effectively?

Q1. Will the adopted Plan's monitoring framework be effectively updated to measure the effects of all of the proposed updates to adopted Policies and the proposed new policies?

a. Is it clear how new policies on climate will be monitored? How will the indicators proposed measure whether the policies are effective and or trigger the need for their review?
b. Is it clear how the effects of new Policy HO14 Houses in Multiple Occupation will be monitored? How will the Council know that this policy is having an effect?

Q2. Should the partial update articulate more clearly how and when the adopted Plan will be fully reviewed?