

9 August 2024

Planning Policy  
Stevenage Borough Council  
Daneshill House  
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Stevenage  
SG1 1HN

Dear Lewis

### **Stevenage Local Plan Partial Review 2024 – Regulation 18 Consultation**

Thank you for consulting us on your Regulation 18 consultation for the partial review of your Local Plan.

We acknowledge that the partial review only deals with specific elements of the Stevenage Borough Local Plan (SBLP), which was adopted in 2019. Our comments relate only to the elements of your Plan that you are proposing to update and are set out below in the order of your Schedule of Changes.

#### **New Policy SP1 – Climate Change**

The wording of the new Policy is intended to align with the SBC Climate Change Strategy and support detailed climate change policies under chapter 6A.

We agree with the update of Policy SP1 – Sustainable Development and its replacement with the new Climate Change Policy. We support the introduction of emission reduction targets seeking the reduction of overall energy demand and promoting ultra-low and zero carbon energy.

North Herts Council is in the process of adopting a Sustainability Supplementary Planning Document which encourages developers to achieve higher standards of sustainability including on carbon reduction, low carbon energy, whole life carbon and water conservation. There are potential cross-boundary collaborations in achieving these targets, particularly where there are adjacent strategic development sites where economies of scale facilitate decentralised energy networks/district heat networks. We would like to see this Policy seek to identify cross-boundary opportunities to work with North Herts and East Herts to exploit such opportunities in the future.

We support the addition of new paragraphs 5.1A to 5.1H to support new Policy SP1.

#### **Use Class Order Changes**

We support the minor amendments made to Policies SP3, SP4, EC1, EC2, EC3, EC4, EC6, EC7, TC2, TC3, TC5, TC6, TC7, TC8, TC9, TC10, TC11, HC1, HC2, HC3, and HC5 and their associated supporting text to reflect amendments to the Use Classes Order.

#### **New Policy SP11 – Flooding and pollution**

This Policy should be worded more strongly, particularly in respect of criterion a); the area of lowest risk of flooding within a development site may still not be appropriate to develop having regard to the

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development vulnerability categories. In the first instance, the sequential test should be passed, and only then should the sequential approach be applied to the development site.

Stevenage has areas of less significant fluvial flood risk compared to surface water flood risk. It is unlikely that Stevenage will be able to achieve the provision of new Flood Storage Reservoirs within its boundary due to the high-density development that is ongoing and site constraints. Policy SP11 should be reworded in order to reflect these priorities.

Supporting text for Policy SP11 should include reference to the multiple functions of SuDS. In addition, Schedule 3 of the Flood and Water Management Act 2010 is expected to come into force in 2024 and is likely to impact this policy (e.g. SuDS must be approved by the SuDS Approving Body or SAB).

The Strategic Flood Risk Assessment (SFRA) for the Borough should be updated to evidence the areas within Stevenage that suffer from increased risk of both fluvial and surface water flood risk. Given the recent extremes of weather that the region has experienced over the time even since the last SFRA was updated, it would be useful to have this evidence updated for future development within Stevenage.

In addition, the supporting text for Policy SP11 refers to the 2012 NPPF, these references should be updated to the most recent version (or forthcoming version) to ensure that the Policy is up to date.

References to pollution that is not water related should be removed and be dealt with elsewhere in the Plan rather than combine the two elements. Alternatively, deal with pollution, in all its forms, as a separate issue aside from flooding.

### **New Chapter - Climate Change**

We support the addition of a new Climate Change chapter in the Local Plan.

### **New Policy CC1 – Energy Efficiency**

We support the ambitions of Policy CC1. It would be useful to understand how you have established your target figures, particularly the 35%. Is there an opportunity here to be more aspirational with your targets, for example.

In relation to the requirement to provide post-construction monitoring and reporting to cover a period of five years from build completion, how do you intend to monitor this and is it something that is enforceable within this context?

### **New Policy CC2 – Heating and cooling**

We agree with the addition of this policy to help control extremes of temperature within buildings in the Borough. The policy may benefit from discussing other factors that can help achieve this balance including more efficient dwelling form factors and optimising fenestration and shading. We also support the promotion of passive ventilation but the inclusion of mechanical ventilation with heat recovery (MVHR) which is likely to be required for highly insulated/ energy efficient buildings.

In the supporting text for this policy, it states that householder proposals will not need to submit energy statements but will still be expected to comply with the policy, how will this be enforced and monitored?

### **New Policy CC3 – Water efficiency**

Whilst we support the addition of this new policy, the target of 110lpppd for water efficiency should be more ambitious. 110lpppd is the Building Regs alternative standard, but it is not sufficient to respond to the water pressure on water resources in the area.

South Cambridgeshire and Tower Hamlets have consulted on a target of 80lpppd in their recent Reg 18 consultations; we would urge Stevenage to aim to achieve these more ambitious targets.

### **New Policy CC4 – Energy infrastructure**

We welcome the promotion of district heat networks particularly in areas where there are strategic development sites across our boundaries where the scale of joint developments proposed would facilitate such schemes.

### **New Policy CC5 – Carbon sinks**

We support the inclusion of this new policy; however, we recognise that given the underbounded nature of the Borough, any gain in carbon sinks is likely to be limited on a large scale. We recognise the cumulative effect of small gains within Stevenage and support this within this policy.

### **New Policy CC6 – Green roofs**

The policy title should include Green walls in addition to Green roofs. Both provide a substantial contribution towards reducing surface water runoff as well as climate change adaptation/mitigation. Whilst the policy currently notes that Green walls are harder to install and maintain, this is not considered to be the case if they are designed into the construction and architecture of the building from the outset. This should not be a reason in itself to reduce the importance of such features in the policy.

### **New Policy CC7 – Digital connectivity**

We support the inclusion of this policy, but we are not sure that the Climate Change chapter is the best place for it. Supporting high quality communications is a separate topic in the NPPF and perhaps it would be best placed to place this policy in a separate section to reflect its importance.

### **New Policy CC8 – The green economy**

We welcome the promotion of the green economy and circular economy principles; the Policy may benefit from the requirement for developers to submit a circular economy statement and/or specific targets for recycling / diverting site waste from landfill.

### **Amended Policy TC4 – Station Gateway Major Opportunity Area**

To confirm, the removal of ‘an extended’ train station, ‘new bus station’ and ‘new multi storey car parking’ relates to the delivery of Platform 5, the relocated bus station on Lytton Way and the multi storey car park on the north car park site, and so their inclusion is not appropriate in the revision of Policy TC4.

The delivery of the multi storey car park on the north car park has resulted in an apparently inaccessible parcel of land further north, bounded by Lytton Way, Fairlands Way and the East Coast Mainline. We understand that the parcel of land is in the ownership of Stevenage Borough Council and has the potential to create a landmark development which could be predominantly residential led, between 6 and 10 storeys in height. It would be interesting to have a little more clarity on the opportunities in this area. Whilst the supporting text refers to the options set out in the Station Gateway AAP, it deals heavily with the traffic options for Lytton Way rather than any other opportunities within the gateway area.

### **Amended Policy HO11**

We support the alterations made in the Policy to reflect the most up to date evidence available in the 2023 Strategic Housing Market Assessment.

### **New Policy HO14 – Houses in Multiple Occupation**

Whilst we support the inclusion of this new policy, it would be pertinent to point to policies/policy subjects that you want the HMO’s to comply with in particular within the policy of supporting text.

### **New Policy GD2 – Design certification**

We support the introduction of a policy requiring design benchmarks/ certification. The policy mentions BREEAM as a method to measure performance. Is BREEAM the most appropriate standard or should the policy be broadened to incorporate other standards such as LETI or Passivhaus.

Paragraph 10.5 of the Local Plan refers to the old Design Guide SPD adopted in 2009, this should be updated and refer to the SPD adopted in January 2023. This wording update should then be included in the schedule of changes for Reg 18.

### **Amended Policy HC2 – Local shops**

Criterion e) is proposed to be amended to specify at least six-month vacancy timeframe. What is this timescale based on and is this a reasonable period of time to expect a shop unit to remain vacant for particularly in the current market climate. Whilst we appreciate that six months is more quantifiable than 'a considerable period of time', the proposed timeframe should be based in evidence, and it is not clear what that evidence is.

### **New Policy FP1 – Sustainable drainage**

The only clear and convincing reason for not providing SuDS on development proposals is in relation to the previous land use being contaminated, and it is not possible to remediate the site. Or the development site is too close to a potable water extraction site, which there are a number of in Stevenage.

Criterion c) is vague; developers should be required to fully demonstrate why they cannot achieve greenfield run-off rates rather than merely aim to achieve greenfield run-off rates.

We support the requirement to not discharge surface water to the foul network. However, we understand that there are areas within the Borough where there is a dual network system, even in these areas, surface water should not be discharged to the surface water network and should be managed through the use of SuDS.

### **New Policy – Flood risk management**

We support the updating of Policy FP2. Criterion d) should be strengthened and functional floodplain should be preserved, protected, and where possible the buffer area adjacent to it should be extended to account for climate change in the future.

Criterion f) should be widened to a 10m buffer zone for main rivers, measured from the top of the bank. This is in line with other Local Authorities and accounts for climate change. The 8m applies to environmental permits issued by the Environment Agency for activities carried out adjacent to main rivers.

Along similar lines, criterion g) does not provide a sufficient or adequate size buffer zone for ordinary watercourses in the Borough. 3m is not of sufficient width to function as a wildlife corridor or as habitat. This buffer zone should be increased to make adequate provision.

Paragraph 13.23 does not need an amendment to 'deculverting' as indicated in the schedule of changes.

### **New Policy NH5a – Trees and woodland**

We support the amendment and inclusion of a more thorough policy as set out in Policy NH5a.

### **New Policy NH5b – Tree-lined streets**

We support the addition of this policy; however, it should be noted that tree-lined streets can act as a pollution trap along roads. Such streets should be planted in such a way to provide shade and habitat, whilst also allowing for pollutants from road traffic to disperse through the tree canopy.

## **New Appendix D – Glossary**

We support the addition of a Glossary to help clarify some of the wording and terminology included in the Local Plan.

## **Amendments to the Proposals Map**

It would be useful to understand why amendments to the Proposals Map are taking place; are these errors that have been identified since the adoption of the Stevenage Borough Local Plan or are these amendments as a consequence of changes to Policies. Further information on this would be useful to provide more specific responses to this element of the consultation.

I hope you find our comments useful. If you wish to discuss anything further or require any clarification on any matters, I would be happy to attend a meeting with you and your team.

Yours sincerely

Debbie Coates

Principal Strategic Planning Officer