

Summary of Regulation 14 representatives and response from Steering Group

Statutory Consultees and other interested parties:

1. Historic England
2. Natural England
3. Environment Agency
4. DPV for Castleoak ref. Land at Burston Nurseries
5. St Albans District Council
6. Highways England
7. The Ramblers Association
8. Turley on behalf of TARMAC
9. Hertfordshire County Council
10. DLA ref. land adjacent to Burston Nurseries, Chiswell Green
11. DLA ref. Bucknalls Drive
12. St Albans Cycle Campaign
13. Aldenham Parish Council
14. Bloor Homes
15. Cllr David Parry
16. British Horse Society

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
General			

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1.	1. HE	Re: Park Street Garden Village, which is a strategic allocation, next to Park Street Conservation Area – potential to include a policy to include specific requirements regarding protection of CA setting and how the strategic development would be integrated/separated from the existing settlement	The Park Street Garden Village concept has been withdrawn from consideration as a result of the withdrawal of the emerging Local Plan.
2.	2. NE	No specific comments on the Plan.	Noted guidance attached to response.
3.	3. EA	As the emerging Local Plan has not been adopted, the NP should pick up aspects of EA remit.	Noted.
4.	4. DPV	Welcome the draft Plan.	Noted.
5.	4. DPV	Supports the release of smaller Green Belt sites to meet acute housing needs.	Noted.
6.	5. SADC	Welcomes the Plan. Confirms that the emerging Local Plan has been withdrawn and the impact this will have on the inclusion of sites in the NP. The intention had been to include a need to identify modifications to Green Belt boundaries through Neighbourhood Plans in the emerging Local Plan. This was anticipated to be adopted prior to the NP. However this has not happened and the current adopted District Local Plan Review 1994 does not contain this need.	Noted. The impact of the potential withdrawal of the Local Plan was publicised with the draft and the implications of this, should it happen, on particular policies relating to housing numbers and allocations. As the emerging Local Plan has been withdrawn, these policies will need to be removed from the Submission Version Neighbourhood Plan.

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7.	5. SADC	Concerns about whether some of the policy criteria are too inflexible.	Noted, to be reviewed on a case-by-case basis.
8.	6. Highways England	Satisfied that policies will not materially affect the safety, reliability and/or operation of the Strategic Route Network.	Noted.
9.	7. Ramblers	Welcome the emphasis on creating new routes for pedestrians and cyclists, and also support for Herts County Council's Rights of Way Improvement Plan.	Noted.
10.	7. Ramblers	See Attachment 2 on various issues.	Noted.
11.	8. TARMAC	The net consequence of the recent withdrawal of the Draft Local Plan is to render the St Stephen Pre-Submission Neighbourhood Plan effectively obsolete. In this regard, where there is an absence of strategic policies (and there are none contained within the saved polices of the development plan) the Draft Regulation 14 Neighbourhood Plan has no authority to remove sites from the Green Belt, as proposed under AIM 1, Policy S1, Policy S2, Policy S20 and the other sites allocations falling under Policies S25 to S29 .	It is correct, as acknowledged in the Important Notice in the front of the Pre-Submission Draft NP, that the NP cannot amend GB boundaries without the strategic need having been identified in the Local Plan. As the emerging Local Plan has now been withdrawn, these policies will need to be removed and reference to them amended. It is not true to say, however, that the withdrawal of the ELP renders the draft Plan obsolete. There are many other policies contained within it that are not reliant on the ELP being adopted and which, in the absence of an up-to-date Local Plan, in fact are recognised as being even more

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			important. This point is supported by the Environment Agency, as an example.
12.	9. HCC	Withdrawal of the Local Plan means that educational facilities planned for at HCC are not needed at this time.	Noted. This will be amended to reflect.
13.	9.HCC	Para 6.2: It is evident that great care and thought has gone into the plan and it is really encouraging to see the desire for the enhancement of local green spaces, whilst stimulating sustainable economic growth, for example by serving the community with fibre-optic broadband to increase connectivity within the parish and reducing the need for commuting.	Noted.
14.	17. Aldenham PC	No comment.	Noted.
15.	15. D. Parry	Strongly in favour of the Plan, its tone, direction and aims. Need to remove references to the emerging Local Plan in its current form and potential allocations within that.	Noted.
About St Stephen			
16.	5. SADC	2.11: Paragraph states that the villages have individual characteristics, which policies then ask to protect, however these characteristics are never described or defined.	Include information on these ahead of Character Policy – expanding on the descriptions provided in the introductory text.
17.	5. SADC	Figure 2.1: Does not show all heritage assets within the area, just listed buildings and conservation areas, and notably misses the Scheduled monument at the BRE. This	Amend and include in new Character/Heritage policy.

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		should be amended to accurately show the heritage assets, as defined in the NPPF and NPPG, or re-captioned.	
18.	9. HCC	<p>Figure 2.1 is captioned as depicting all heritage assets in the parish, although this is incorrect. It shows listed buildings and conservation areas, but no below ground archaeological remains (non-designated heritage assets) or unlisted standing buildings that have entries in the Heritage Environment Record/Gateway and are therefore non-designated heritage assets.</p> <p>Recommend inclusion of a heritage policy: This should state that planning applications that propose development within the parish should include sufficient information about their impact on the historic environment. This may include a heritage statement, an archaeological desk-based assessment, and/or the results of an archaeological evaluation. Any proposals likely to impact on archaeological remains may need to mitigate that impact via archaeological excavation and recording or preservation in situ, as appropriate.</p>	Agreed – amend caption, although map to be amended to incorporate The Barn as a NHDA.
Vision and Objectives			
19.	1. HE	No specific mention of heritage in the Vision	Noted – amend to reflect new policy.
20.	7. Ramblers	Strongly support elements of the vision and objectives 6 and 8.	Noted.

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21.	8. TARMAC	<p>A vision to retain the existing character of each and every village in the Parish is somewhat unrealistic. However where larger strategic growth opportunities can be supported, this would help to remove growth pressures from more sensitive locations, whilst also focusing new growth to help make it more sustainable.</p> <p>We encourage the Parish Council to take a balanced approach to the future release of additional Green Belt land in St Stephen to help meet the District's future needs, by supporting the release of Green Belt on land which has been previously used, or does not perform a critical function, in terms of the five purposes of Green Belt.</p> <p>The aspiration to provide community leisure and recreation facilities to meet all residents' needs can best be secured through the catalyst of new development. Where sites are non-strategic in scale these facilities are likely to need to be provided off site. However, where more strategic scale sites are supported, such sites can often provide larger scale community leisure and</p>	<p>The intention is to retain this within the vision and include a policy setting out how local character (and heritage) is to be supported.</p> <p>The NP cannot pre-empt any strategic allocations that may or may not form part of the future ELP. This would need to be considered in a review of the NP, following the adoption of the new Local Plan.</p> <p>This would need to be considered in a review of the NP, following the adoption of the new Local Plan.</p>

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		recreation facilities to serve both the needs of the development and the wider Parish.	
22.	9. HCC	When proposals for development within the sand and gravel belt come forward, the county council should be consulted, in order that further detailed comments can be provided in relation to minerals. Opportunistic extraction should be considered to make use of on-site sand and gravel on development sites. It is therefore considered that the plan's Vision and Objectives should take these minerals and waste matters into account.	Minerals and Waste matter.
23.	9. HCC	Vision points 7, 8, 9: Supported. Objectives: 1, 2, 6: Supported.	Noted.
24.	16. British Horse Society	Support the objectives. Would like to include horse riding in vision and transport objective.	Amend.
Spatial Strategy			
25.	7. Ramblers	Figures 4.1 and 4.2 Proposed Amendment to the Built Up Area Boundary. We note that the area included in the Park Street Garden Village Broad Location includes not only the village but also space allocated for transport infrastructure. Is this deliberate?	This will have to be extracted in any case and the map redrawn in light of the withdrawal of the ELP.
26.	12. SACC	Welcome the aim of encouraging active travel, but would like to see more being done to achieve this: making better use of Prow; planning for new and improved routes	Noted – make reference to the LCWIP in the action table.

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		(through LCWIP); providing secure cycle parking; new and improved cycle routes.	
Policy S1: Spatial Strategy			
27.	4. DPV	Support.	Noted.
28.	5. SADC	<p><i>“They relate to necessary utilities infrastructure and where no reasonable alternative location is available; or”</i></p> <p>It is not wholly clear what is sought by the phrase “They relate to necessary utilities infrastructure and where no reasonable alternative location is available”, and likewise “visually intrusive location” is not clear either. Would this be simply better to refer to the exceptions set out in the NPPF. This could otherwise be open to interpretation.</p> <p>Point 2: should be <i>“preserve or enhance”</i>.</p> <p><i>“If located in the Green Belt, development proposals must be for an appropriate use or very special circumstances must be demonstrated.”</i></p> <p>Is wording tight enough to avoid unintended consequences? Should also reference ‘Exceptions’ as set out in paragraph of the NPPF.</p>	<p>Retain – this part of the policy seeks to concentrate new development within the built-up area boundary unless it otherwise relates to development in the countryside supported either by national or local policies – in this case essential infrastructure related to utilities.</p> <p>Typo – amend.</p> <p>Expand to say: “Development which meets either the exceptions to inappropriate development in the Green Belt as set out in paragraphs 145 and 146 of the National Planning Policy Framework, or demonstrates very special circumstances, as set out in paragraph 147 of the National Planning Policy Framework, will be supported.”</p>

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			Policy to be redrafted to remove sites following withdrawal of ELP.
29.	7. Ramblers	We regret the proposals which erode the Green Belt but welcome the intention to resist any other developments in the Green Belt.	Noted.
30.	11. DLA for Bucknall's Drive	Typo: Bucknalls Lane Drive .	Noted.
31.	15. D Parry	Suggest an addition to clause 4. Where very special circumstances can be demonstrated, development should make additional provision for: a, affordable housing, or b, smaller units for younger people, or c, properties tailored to the ageing population, or d, provision of additional community benefit	Noted and amended, although this is picked up in the Housing Mix policy.
Housing Section			
32.	1. HE	Could we include a policy to promote conservation and enjoyment of the historic environment (designated and non-designated).	The Steering Group has investigated this and plans to include a new policy on NHDAs including reference to the Heritage Gateway list and identifying others that are not on this list.
33.	5. SADC	Para 5.15: Consider if it should refer to new LHNA instead of SHMA	To consider, although I think the point here is that our HNA and wider housing structure/pricing is essentially reinforcing the findings of the SHMA.

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Policy S2: Housing Strategy			
34.	4. DPV	Strongly Support.	Noted.
35.	5. SADC	As has been raised in previous discussions between SADC and the Parish, the Districts Emerging Local Plan has now been formally withdrawn.	This has been withdrawn during Regulation 14. Delete policy and reconsider housing numbers post-adoption of the ELP in a review of the NDP.
36.	7. Ramblers	See our comments on S1 (Comment 27).	See response to comment 27.
37.	8. TARMAC	<p>Accordingly as Policy S2 needs to be withdrawn this local housing strategy is effectively redundant and will need to be reconfigured in the light of an increased housing need and the stated vision and objectives of the emerging Neighbourhood Plan. As such, the current Neighbourhood Plan is inconsistent with the NPPF by not contributing to the achievement of sustainable development and so fails to meet basic condition a) and d).</p> <p>Whilst it is acknowledged that large elements of the Pre-Submission Consultation Draft, including all its proposed allocations, will now have to be withdrawn it is considered that the potential of the St Stephen Parish area to more fully contribute to the achievement of sustainable development in St Albans District has not been acknowledged in emerging Neighbourhood Plan policy.</p>	<p>The NP is not considered to be inconsistent with the NPPF. It supports growth, but the only growth it can support is within the settlement boundaries, as it cannot amend the GB boundaries, which stretch to the settlement boundaries. An early review of the NP will need to be undertaken once the new Local Plan is adopted.</p> <p>Policy S1 does not preclude strategic allocations that may or may not come forward in the event of a new Local Plan being adopted.</p>
Policy S3: Dwelling Mix			

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38.	4. DPV	Support.	Noted.
39.	5. SADC	The wording of S3(1) could potentially be clearer, as it implies that larger dwellings would not be supported. Is there a definition of 'local connection'? What does this mean? Difficult to secure this in practice if no definition	Expand to 'redress the imbalance in housing size across the parish' Include reference to SADC Allocations Policy
40.	15. D Parry	Query re: defining our own definition of 'affordable'.	The definition is set at a national level.
Policy S4: Design of Development			
41.	4. DPV	Support.	Noted.
42.	5. SADC	<p>- <i>"In particular development proposals should demonstrate how they have sought to address the following matters as they are appropriate to their scale, nature and location:"</i> This is open ended and may cause issues as to how the planning officers will enforce this policy. Should set out the scale of development this policy will apply to. The policy seems to relate to all development and requires:</p> <p>- <i>"iv. Provides pedestrian and cycle connections to community facilities, local services and transport modes within the Parish, as well as to the surrounding countryside;</i></p> <p><i>vii. Features flora and fauna friendly design, for instance front garden space, using species that have a high UTAQ score¹⁹;</i></p>	- This wording applies the elements of the policy insofar as they relate to the development proposed. Plainly this will vary based on the scale, nature and the location of the site concerned, hence the wording as proposed is considered to be flexible enough to apply this.

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		<p><i>viii. Contributes to the provision, extension and maintenance of accessible green space, including green space for sport and children’s play areas, in accordance with St Albans open space provision and Hertfordshire County Council’s Planning Obligations Guidance”</i></p> <p>The above points seem to relate more to larger scale developments and would not usually be for considerations for small scale householders. It would appear difficult for householder development to demonstrate they would comply with these points.</p> <p>- Part 2 relates to sustainable development. It is not clear whether the applicant needs to demonstrate if they would comply with these standards and how Planning Officers would assess this.</p> <p>- Policy S4(v) – why just concealed storage for recycling bins? What about other bins?</p> <p>- Policy S4(4) – has the impact of basements on groundwater source protection zones been considered?</p> <p>- BREEAM standards require specific assessment – how</p>	<p>- Agreed, and this is why the stipulation is put at the start of the policy (as appropriate to scale, nature and location).</p> <p>- Reword as: “Proposals which incorporate the following design and environmental performance measures and standards to reduce energy consumption and climate effects will be supported:”</p> <p>- Agree – change to “Provides adequate and concealed storage for waste and recycling bins;</p> <p>- Leave as is as this would be dealt with through Building Regulations.</p>

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		<p>would we enforce or assess this? Would we require developers to pay for this assessment? How would we ensure that once the assessment is final (normally after completion) that the real grade isn't below the projected?</p> <p>- The policy contradicts itself – it asks for buildings with low embedded carbon profiles, yet asks for basements in the next section which have high embedded carbon profiles.</p> <p>- (vii) UTAQ score? What is this? Takes you to footnote 13 which is the Inspector letter.</p>	<p>- Amend to 'should AIM to meet' as this is a voluntary scheme.</p> <p>- Noted, but retain as is.</p> <p>- This is a typo – it should lead to Footnote 13 – suggest retype the footnote link in its entirety.</p>
43.	7. Ramblers	<p>Strongly support part (iv): Provide pedestrian and cycle connections to community facilities, local services and transport modes within the Parish, as well as to the surrounding countryside.</p> <p>Pedestrian links to the surrounding countryside have an important impact on the sustainability of any new development and should also be included in the last bullet of para 5.16. If residents do not have good links into the countryside e.g. for regular dog walks, they will use their</p>	Agreed – include point in 5.16.

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		cars to travel to a more suitable location thus increasing the volume of vehicular traffic.	
44.	9. HCC	The county council declared a climate emergency in July 2019 and has since published the Sustainable Hertfordshire Strategy. The strategy outlines HCC's nine ambitions; how the authority will lead as an organisation and enable and inspire a sustainable county. There may be some ideas which could be transpired into the neighbourhood plan.	Noted.
45.	9. HCC	<p>Paragraph ii: the text should be elaborated further, as it is unclear how the plan is quantifying high quality and thermally efficient materials. Will the plan also provide a minimum thermal efficiency rating?</p> <p>Paragraph v: the text should also be elaborated, as it is unclear how the plan is quantifying low embedded carbon materials. Will the plan provide a list of sustainable efficient materials that can be used?</p>	Noted but retain as is.
46.	9. HCC	Point 2: Providing parking spaces can have an adverse impact on the use of sustainable modes of transport as such parking provision will need to be aligned with the policies in HCC's LTP4 and considered with the need to reduce the dependency on the private car and encourage the use of more sustainable modes of transport. It is noted the parking standards for the plan area are set by St Albans City & District Council.	Car usage is high in the parish due to its rural location and acknowledged by HCC. The purpose of this clause is to mitigate against further on-street parking, which causes congestion and safety issues. The Plan emphasises the need, in the transport section, for sustainable modes of

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		Point 4: supported.	transport, however, it must also plan realistically for car use. Noted.
47.	16. British Horse Society	And recognise the needs of horse riders – can new largescale development incorporate additional rights of way.	Noted, amend.
Green Spaces and the Environment			
48.	1. HE	Potential to include generic entry views of key views as a policy.	Noted.
49.	7. Ramblers	Para 6.1 We agree that the protection given by the Green Belt is vital and welcome the recognition of the importance of the framework of woodlands, rivers, ponds, fields, bridleways and footpaths within it. Support all policies and the Aim.	Noted.
50.	16. British Horse Society	Support all of these policies.	Noted.
Policy S5: Minimising the Environmental Impact of Development			
51.	3. EA	Support, particularly parts (iv), (vi).	Noted.
52.	4. DPV	Support.	Noted.
53.	5. SADC	Should set out the scale of development this policy will apply to.	The policy is worded flexibly. Retain.

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		<p><i>“As they are appropriate to their scale, nature and location, development proposals should demonstrate that they address the following matters:”</i></p> <p>This is open ended and may cause issues as to how the planning officers will enforce this policy.</p> <p><i>“Character and features of the St Stephens landscape”</i></p> <p>This is a very broad statement, the area has a variety of landscape. It is unclear what the intention of this policy is.</p>	<p>Agreed – Expand to say “Development proposals should maintain and where practicable enhance the natural environment, landscape features and the rural character and setting of the Neighbourhood area*. Development proposals that would achieve a net gain in biodiversity will be particularly supported.”</p> <p>* for instance, woodland and chalk streams</p>
54.	9. HCC	<p>Paragraph i: the text should be elaborated further, as it is unclear how the policy is quantifying a contribution to the Watling Chase Community Forest Plan and the Charter for Trees, Woods and People.</p> <p>6.12 Paragraph v: the text should also be elaborated, as it is unclear how the policy is quantifying enhancement with regard to the development of the river corridors and water meadows.</p>	<p>Perhaps amend to: “contribute to the objectives of both the Watling Chase Community Forest Plan and the Charter for Trees, Woods and People, by supporting the creation planting of additional trees and woodlands”.</p> <p>Include a separate Action to plant/manage new woodlands in parts of the parish (to counter pollution for instance)</p> <p>Add examples of ‘enhancement’ to supporting text e.g. widening buffer zones; stop mowing banks near to the river; removal of non-native plants.</p>

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55.	15. D. Parry	Vi. "protect and enhance river corridors and water meadows from development " v. M25 not M24 (typo).	Agree and amend.
Policy S6: Protection of Natural Habitats			
56.	3. EA	Support.	Noted.
57.	4. DPV	Support.	Noted.
58.	9. HCC	<p>It would be useful to identify the particular species and types of habitat to be conserved, or alternatively refer to the evidence based documents.</p> <p>6.14 Paragraph 3: As currently worded, the monitoring of the management of open space over the lifetime of the development is unclear, along with its enforcement.</p>	<p>This is expanded on in the supporting text.</p> <p>"The use of an appropriate legal agreement (such as a Section 106 agreement) will be required to ensure proper management of the open space over the lifetime of the development."</p> <p>(Sites must have secure funding for their future maintenance – The difficulty here is that in most cases section 106 agreements are negotiated between lawyers and planners (sometime at appeal hearings) without any public involvement or consultation. And once they are signed, the enforcement of the key provisions about open space often gets forgotten.)</p>

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Policy S7: Protection and Retention of Local Green Spaces			
59.	4. DPV	Support.	Noted.
60.	5. SADC	List does not include Greenwood Park or the play area to the rear of Midway Surgery – are these covered elsewhere in the document?	These two sites are owned by the Parish Council and therefore are considered to be adequately protected.
61.	9. HCC	Paragraph 2: As currently worded, it is unclear how the policy is quantifying enhancement.	I think this will need amending to: “Development proposals which demonstrably accord with development appropriate within a Green Belt will be supported, subject to compliance with other policies within the Neighbourhood Plan.” Local policy for managing development on a Local Green Space should be consistent with policy for Green Belts (NPPF 145); proposals for built development on will not be permitted unless it can be clearly demonstrated that it is required to enhance the role and function of that Local Green Space.
62.	15. D Parry	Area 7 on the list is within Green Belt. Can we protected verges?	It is possible to designate sites within the Green Belt – see justifications. Verges are not considered demonstrably special for this particular designation. They are considered to be distinctive features of the parish,

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			however, and are therefore mentioned in Policy S6 (renumbered).
Policy S8: Protecting the Setting and Function of the River Ver, the River Colne and their Tributaries			
63.	3. EA	Extremely supportive. Potential to expand to stipulate that the buffer zone should be at least 8m.	Noted and potential to add to the justification here using their helpful text. Agree to expand buffer zone minimum of 8m.
64.	4. DPV	Support.	Noted.
65.	5. SADC	Concern around the phrase ' <i>exceptional circumstances</i> ' - definition or guidance needed. Presume the policy means it won't be allowed unless demonstrated it can't be provided elsewhere? Definition or changing of wording would be useful.	We could turn this around and say "Proposals for development that adjoins or is in the river corridor of the River Ver or its tributaries, as shown on the Policies Map, should contribute to and enhance this natural and local environment and will be supported where it: "
66.	9. HCC	<p>The Strategic Environmental Assessment that accompanies the neighbourhood plan highlights that the Ver and Colne rivers are susceptible to flooding. Natural flooding mitigations, such as planting indigenous trees which help prevent soil erosion and flooding should therefore be considered in the policy.</p> <p>6.17 Paragraph i: the text should be elaborated further, as it is unclear how the policy is quantifying an adverse effect on the geological, ecological, landscape, species, habitats and sustainability criteria of the river Ver and river Colne.</p>	<p>Agree – add sentence to supporting text and include in policy.</p> <p>Look at SEA wording to see how they have measured 'adverse effect'.</p>

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		6.18 Paragraph ii: the text should also be elaborated, as it is unclear how the policy is quantifying enhancement of biodiversity, landscape and recreational value.	Can we define 'enhance' in this context? See above.
67.	15. D. Parry	Ver is a tributary of the Colne not the other way around.	Noted and amended.
Policy S9: Green Infrastructure and Development			
68.	3. EA	Support.	Noted.
69.	4. DPV	Support.	Noted.
70.	5. SADC	Refers to proposals being designed ' <i>from inception</i> ' – this may be difficult to prove/assess as part of the policy.	The policy reflects work that has been undertaken to map the various elements of green infrastructure in the neighbourhood area. It comments that proposals should be designed from inception to create, conserve, enhance and manage green spaces and connective chains of green infrastructure. Its wider aim is to deliver a net environmental benefit for local people and wildlife. It also offers support to proposals that seek to improve the connectivity between wildlife areas and green spaces. It is considered that the policy takes a positive approach to this important matter.
71.	9. HCC	The text within the policy should be elaborated further, as it is unclear how the policy is quantifying "a net environmental benefit for local people and wildlife" and improvement "between wildlife areas and green spaces."	Include reference in the policy to the Defra <i>Biodiversity</i> Metric 2.0 as a way of measuring this.
Transport and Movement			

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72.	5. SADC	Figure 7.1: shows pinch points 1,5 & 6 outside the NP boundary	This is correct, but the supporting text explains this.
73.	7. Ramblers	Para 7.24: We welcome the emphasis on cycling and walking for both their wellbeing and environmental benefits. (Para 7.24)	Noted.
Policy S10: Improvements to Local Key Junctions and Pinch Points			
74.	4. DPV	Support.	Noted.
75.	9. HCC	Support.	Noted.
Policy S11: Off-street car parking			
76.	4. DPV	Support.	Noted.
77.	5. SADC	Para 7.15 afterwards refers to parking standards in Policy S5 – This should be S4.	Noted – amend for Submission Version.
78.	9. HCC	Point 1: Car parking should favour those with limited access to other modes of (sustainable) transport. Point 2: Object – providing car parking can negatively impact the uptake of sustainable modes of transport. Recommend deletion as it is contrary to NPPF objectives on sustainable development and HCC's adopted LTP4.	The parish has high car ownership and dependence and high level of demand for car parking. (can we insert some more examples?). Exacerbated by the proximity to some of the country's main highway routes. The context for this is that the Plan seeks to minimise the use of cars but it is an area of high car ownership, recorded at 1.6 per household in the 2011 Census. Parking is a major source of concern, with a high percentage of survey respondents wanting a

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			<p>reduction in on-street parking and respondents commenting that existing parking facilities were not sufficient.</p> <p>We could amend to:</p> <p>“1. Development proposals that would result in an unacceptable loss of existing publicly available off-street car parking spaces will not be supported.</p> <p>2. Proposals that enable the provision of additional, publicly accessible off-road car parking spaces, to alleviate parking congestion at the main village shopping areas, will be supported.</p> <p>3. Alongside any new public car parking provision, the following facilities will be strongly supported to be provided as part of that provision:</p> <p>a. dedicated bicycle parking facilities, preferably with e-bike charging points, covered and secure; and</p> <p>b. future-proofed electric vehicle charging points.”</p>
Policy S12: Bus Services and Community Transport			
79.	4. DPV	Support.	Noted.
80.	5. SADC	<i>“Contributions from new major development in the neighbourhood area will be used to support additional community bus services or, where appropriate, and improvements to public transport infrastructure. These contributions will be collected through Section 106 Agreements or the Community Infrastructure Levy</i>	Need to double check existing Local Plan.

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		<p><i>mechanism.</i></p> <p>Does this need to link to national/district policy requirements, otherwise the requirement doesn't appear to 'hang' on anything else.</p>	<p>NPPF para 102: Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <p>c) opportunities to promote walking, cycling and public transport use are identified and pursued;</p>
81.	9. HCC	Support.	<p>Add to supporting text?:</p> <p>"Section 106 contributions can only be sought where the CIL Regulations restrictions are met. It is likely to be only at the larger, broad locations for development where contributions can be sought towards bus service improvement to benefit the site. Smaller sites could be asked to contribute towards bus stop infrastructure improvements."</p>
Policy S13: Provision for Walking and Cycling			
82.	4. DPV	Support.	Noted.
83.	5. SADC	<p>"Development that is immediately adjacent to a footpath or cycleway will be expected to: i. ensure the retention and where possible the enhancement of the path; ii. not have any detrimental impact on the path, and further assess and address the impact of the additional traffic movements on the safety and flow of pedestrians."</p> <p>How is it expected to assess whether a proposal would have a detrimental impact on a path? Is this in terms of visual amenity/safety etc.?</p>	<p>Noted - add to supporting text.</p> <p>Quantify with: Visual impact, accessibility and safety.</p> <p>Unless improved accessibility by rerouting the FP could be rerouted</p> <p>New or rerouted paths to link to wider network.</p>

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84.	7. Ramblers	<p>We strongly support these policies as far as they go but do not think that as written they are sufficient enough to achieve the plans objectives.</p> <p>To ensure that the general public will have the right to use the principal through routes of all new developments we very strongly recommend the addition of a policy that: <i>“All new pedestrian or cycle paths which do not run alongside an adopted highway must be dedicated as public rights of way and where a through route depends on an un-adopted road the dedication must run from one adopted highway to another.”</i></p>	This may need to be an associated action alongside the policy – adopting of footpaths.
85.	9. HCC	Support.	Noted.
86.	16. British Horse Society	Can horse-riders be included here?	Amend.
Policy S14: Improving the bridleway network			
87.	4. DPV	Support.	Noted.
88.	7. Ramblers	We support this policy. In St Stephen there are a number of equestrian establishments which are an important element of the rural economy and improved bridleways are also beneficial for walkers and cyclists. Moreover the requirement for safe road crossing points should be applied to all public rights of way and not just bridleways.	Noted.
89.	9. HCC	Supported.	Noted.

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90.	16. British Horse Society	Strongly support.	Noted.
Community Facilities			
Policy S15: Community Facilities			
91.	4. DPV	Support.	Noted.
92.	5. SADC	Paragraph 1 isn't in line with paragraphs 8.3 and 8.4? Is there a need for this paragraph given paragraphs 3 of the Policy? Could Paragraphs 1 and 3 be combined?	Agree we could either delete Para 1 or combine with Para 3.
Aim 1: Community Facilities on the Donkey Field			
93.	7. Ramblers	If this site is developed as proposed it is essential that the existing public right of way is preserved and any new paths are dedicated as public rights of way to ensure that they are available to the public in perpetuity.	Agreed.
94.	16. British Horse Society	It is essential that the existing public right of way is preserved and any new paths are dedicated as public rights of way to ensure that they are available to the public in perpetuity.	Noted and agreed.
Policy S16: Provision of Leisure Facilities for Children and Teenagers			
95.	4. DPV	Support.	Noted.
96.	5. SADC	Suggest adding the sentence in bold below.	Agreed.

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		<i>“Major development that includes play grounds and leisure facilities for children and young people will be viewed favourably (subject to compliance with other relevant Policies in the Development Plan). They will be expected to demonstrate that the likely needs of the under-18 population have been assessed and have sought, where possible, to address these needs and included such provision in proposals.”</i>	
97.	15. D. Parry	Should the policy also mention provision for older children?	Added.
Policy S17: Protection of Public Houses			
98.	4. DPV	Support.	Noted.
99.	5. SADC	Can this Policy be part of S15?	Agree to combine within one overall community facilities policy.
Policy S18: Allotments and Community Growing Spaces			
100.	4. DPV	Support.	Noted.
Policy S19: Retirement/ Care Home Facilities			
101.	5. SADC	Does this link to S20 or is there support for more than one retirement village?	Included both in case of need to remove Policy S20, which is now the case.
Policy S20: Burston Nurseries			
102.	1. HE	Pleased to see inclusion of need for heritage statement to accompany any application. Potential to expand policy to	

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		include criteria about scaling, mass, layout and landscaping to minimise negative heritage impact, possibly through a Heritage Impact Assessment.	
103.	4. DPV	Sets out the case for development at this site.	Noted.
104.	7. Ramblers	If this site is developed as proposed we welcome the provision of a signalised crossing point on the A405 but this must be suitable for cyclists and equestrians and not just for pedestrians. We would also welcome the provision of new and enhanced public footpaths/ bridleways to enhance access to the countryside. These need to be dedicated as public rights of way.	Noted.
105.	16. British Horse Society	A signalised crossing point should be incorporated at the A405, suitable for all non-motorised users.	Noted.
Business and Local Economy			
106.	7. Ramblers	Paragraph 9.4 page 62 Local Access Issues We note this paragraph contains the only reference to the proposed Strategic Rail Freight Terminal	Noted – the SRFT status has changed since publication; it was proposed as the site of the Park Street Garden Village, but withdrawn.
Policy S21: Supporting Expansion of Businesses			
107.	4. DPV	Support.	Noted.
Policy S22: Village Retail Areas			

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108.	4. DPV	Support.	Noted.
Policy S23: Protection of Existing Employment Premises or Land			
109.	4. DPV	Support.	Noted.
Policy S24: High Speed Broadband			
110.	4. DPV	Support.	Noted.
111.	9. HCC	Support.	Noted.
Site allocations			
112.	9. HCC	It is noted that the plan proposes several site allocations; all have some archaeological potential. Whilst there is now some uncertainty as to whether these sites will come forward for development, given the withdrawal of the district council's draft local plan, it is likely that the district archaeologist at SADC will have comments to make on any eventual planning applications may subsequently be submitted.	Noted.
113.	9. HCC	A Transport Statement or Assessment would need to be submitted for proposals of 10 or more dwellings.	Noted.
114.	10. DLA (for landowners adjacent to Burstons site)	The need to withdraw the sites as a result of the ELP being withdrawn will allow further time to consider a potentially more holistic approach to development of Burstons in discussion with surrounding landowners.	Noted.
Policy S25: Land at Orchard Drive, Park Street			
115.	7. Ramblers	Paragraph A vi.	Noted.

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		<p>We can see no point in removing the playground at the southern end of the site from the Green Belt and then designating it as Local Green Space. Local Green Space has essentially the same protection as the Green Belt and according to policy S15 this land should not in any case be available for development. It would be better to leave this area in the Green Belt and modify Fig 10.1 to show this.</p> <p>Paragraph A vii a) Footpath 75 is a key link to the footbridge over the A405 and an essential element of the shortest pedestrian route from Park Street to Killigrew School and Greenwood Park. It is also a link in the National Cycle Route from Watford to St Albans. But it is only 2 metres wide and unsafe for shared pedestrian and cyclist use. Although cyclists are required to dismount in practice many do not with a consequential safety risk. A development on the adjacent field offers the opportunity for this path to be widened sufficiently for it to be safe for shared use without requiring cyclists to dismount. This paragraph needs to be modified to require FP75 to be widened and surfaced to make it suitable for shared use by cyclists and pedestrians.</p> <p>b) The requirement to link FP75 and 77 is unclear. In our view the requirement is for a continuous path suitable for walkers, cyclists and equestrians along the whole of the eastern verge of the A405 from Tippendell Lane to link up with the existing paths at the end of Mayflower Road. There is already a path</p>	

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		between FP75 and the entrance to Meadowside Travellers site. This path needs to be extended southwards beyond FP77 to Mayflower Road. This paragraph should be amended to include this requirement.	
116.	15. D. Parry	<p>Considers site to be remote from services and therefore not in a sustainable location.</p> <p>This site to some degree contradicts the statement in 6.1 about green spaces separating villages, and this is only partially compensated by S25 1.v. requiring a Tree Buffer.</p> <p>The site is adjacent to a rather narrow road and some highway improvements should be incorporated if this site is to go forward.</p>	Noted.
Policy S26: Land at Park Street Baptist Church, Park Street			
117.	7. Ramblers	The plan needs to contain provisions which will ensure that the southern part of the site retained as a buffer is available for public access in perpetuity. See our covering letter.	Noted.
118.	14. Bloor Homes	Concerned about the criteria about the amount of green community space required, which exceeds the standard amount as set out in the Local Plan Review. Lack of justification about the current extent of community use on the site.	The criteria were established following discussions with the landowner and are considered proportionate in the context of removing this space from the Green Belt and providing for community space.

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119.	15. D Parry	Approve of this site but would like to see a contribution to Highway improvements to Penn Road/ Tippendell Lane as mentioned in 7.7 'Park Street'. Also would not wish provision of Community Facilities to excuse full provision of Social housing Quota.	Noted.
Policy S27: Land south of Park Street Lane, Park Street			
120.	15. D Parry	This is the least justifiable of the proposed sites and is poorly served by public transport and a long way from any facilities – rather exemplifies 'unrestricted sprawl and countryside encroachment' and therefore fails on Green Belt criteria. The proposal for tree planting on the remaining land between the site and the M25 is only a fairly poor compensation, and if this site is to go forward it should have a stronger policy to ensure planting.	Noted.
Policy S28: Land to the rear of 42 to 75 Bucknalls Drive, Bricket Wood			
121.	7. Ramblers	We strongly support the need for a public route, either through or adjacent to, this site between Bucknalls drive and the common with a link to Footpath 59. To ensure that it is available for public use in perpetuity it must be dedicated as a public right of way from the nearest adopted highway to the boundary of the common.	Noted.

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122.	11. DLA for Bucknall's Drive	<p>Would welcome a discussion with the PC about how the site could be delivered in spite of the withdrawal of the Local Plan.</p> <p>Recommend wording change to policy 'approximately' instead of 'a minimum of'.</p>	<p>Suggest we ask all site owners this question – might they be willing to come forward as Exception Sites? If so, it might be feasible to include a policy about Exception Sites?</p> <p>Noted.</p>
123.	15. D Parry	<p>This is a sensible proposal and contained by Bricket Wood common and the BRE. The proposal, with low density housing is appropriate adjacent to these adjacent sites and the access through to the common would be a valuable asset to the new Lancaster Grange development.</p>	Noted.
Policy S29: Land at Frogmore, Park Street			
124.	3. EA	<p>As this is in floodzone, could the areas within the floodzone be incorporated as open space on the site?</p> <p>Wording: "v. All built development is located outside of flood zones".</p>	Noted.
125.	15. D Parry	<p>It is not appropriate for me to comment on this site, due to professional interest.</p>	Noted.
Implementation and Monitoring			
126.	7. Ramblers	<p>Paragraph 11.5. We suggest adding the word Paths to the first sentence so that it reads:</p>	Agreed.

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		“Any of the above could include new roads, paths and transport	
Non Land Use Actions and Spending Priorities			
127.	1.HE	Pleased to note action to identify non-designated heritage assets – could the Spending Priorities designate funds to conservation of heritage?	Noted – expand action to conserve heritage.
128.	7. Ramblers	Page 80 Environment and appearance We support the intention to improve the state of footpaths/cycleways/bridleways by checking rights of way on a regular basis and lobbying for improvements.	Noted.
129.	9. HCC	Improve road conditions for all users. There are a number of possible measures presented to improve road conditions for all users, and it is considered that the information provided is too specific to be included in the plan. It would be more appropriate to provide generic information in the plan in relation to measures that could be used to improve road conditions, as the specific details of these will be assessed through either a Transport Statement or Transport Assessment submitted as part of planning applications for new developments of 10 dwellings or more as outlined in ‘Roads in Hertfordshire. Buses – specifically the need to provide evening, weekend and early morning services The frequencies and hours of operation of commercial bus services are determined by operators based on demand. The Intalink Bus Strategy and	Noted. Noted.

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
		<p>Enhanced Partnership Plan and Scheme (see link provided earlier) set out HCC's priorities in relation to the commercial bus network and outline how will work with operators to improve the network. The approach is focussed on infrastructure and softer measures as a way of making the network more attractive to use, thus increasing patronage and hopefully leading to service improvements as routes become more commercially viable. In our experience up front funding of service improvements often fails as costs are not balanced out with sufficient increases in patronage. We do support provision of improved services at new developments where this can be funded through developer contributions. The county council would prefer therefore that this intervention was reworded to be more in line with our priorities.</p>	
Strategic Environmental Assessment			
130.	5. SADC	In light of the above comments, you may been to consider the implications of your SEA work	AE to approach AECOM to query.