

St Stephen Parish Neighbourhood Plan



Consultation Statement to accompany The Submission Version (Regulation 16) Neighbourhood Plan

February 2021

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1. INTRODUCTION

- 1.1. This consultation statement has been prepared in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012, which requires that a consultation statement should:
 - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.
- 1.2. The policies contained in the St Stephen Parish Neighbourhood Development Plan ('the Plan') have been developed as a result of extensive interaction and consultation with the community and businesses within St Stephen Parish. The Plan reflects the views of the majority of the community. Engagement with the community has been through ongoing publicity campaigns which have included leaflet drops to households, public meetings, exhibitions, a Community Survey and culminating (to date) with the Public Consultation.
- 1.3. All activity has been overseen and coordinated by St Stephen Parish Council via a dedicated Steering Group and a suite of topic-specific Working Parties. The process has been supported throughout by Alison Eardley Consulting neighbourhood planning consultants, appointed following a tendering exercise.

About St Stephen Parish

- 1.4. St Stephen Parish lies some 20 miles north of London, in the southwest corner of Hertfordshire between the City of St Albans and the town of Watford. It falls under the administrative control of St Albans City and District Council. The Parish comprises three villages, Bricket Wood, Chiswell Green and Park Street, the latter also incorporating the residential area known as How Wood and the smaller hamlets of Frogmore and Colney Street.
- 1.5. The 2011 national census records the Parish's population as 13,865, living in 5,815 dwellings. Adjacent to both the M1 and M25 motorways and within the 'commuter belt', the Parish is a popular residential area with higher than average property prices.
- 1.6. The Parish has a higher than average percentage of older residents compared to both national and district figures with around 20% of residents aged over 65. There is a high level of home ownership; 82% compared to District (73%) and National (63%). There is a noticeably higher than average car ownership, fuelled by the Parish's rural location and inadequate public transport facilities.
- 1.7. The Parish's population is likely to increase markedly in the future with several large developments underway, notably in Bricket Wood. Longer term, the emerging Local Plan will set out a revised growth strategy for the district.

2. SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

2.1. Appendix A contains a timeline summary of significant engagements, events and activities.

Stage I: Launching the Plan, seeking input and involvement from the community and local businesses

2.2. **Steering Group:** An initial group comprising Parish Councillors had come together to head the process. They sought volunteers from the community to join, using the council meetings, the launch meeting and local drop-in days to garner interest. This led to the establishments of a Steering Group comprising a number of St Stephen Parish councillors, representatives from the three villages in the Parish, supported by an appointed external consultant.

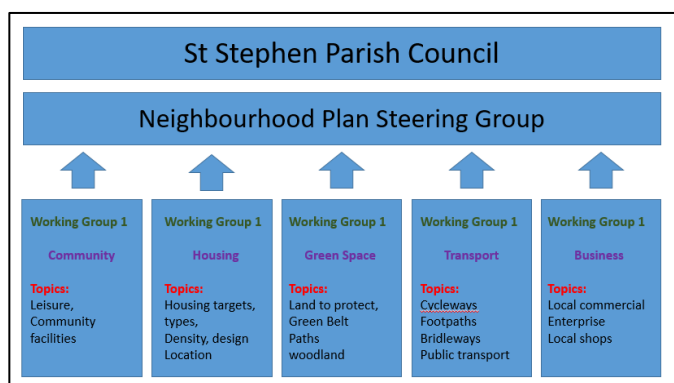
2.3. The Steering Group has met regularly since the inception of the Plan, although latterly via 'virtual' meetings due to COVID-19 restrictions. Meetings have also been held throughout the process with developers, representatives of St Albans City and District Council and other relevant bodies including local major employers and adjacent parishes.

2.4. **Launching the Plan:** St Stephen Parish Council, the formal lead on the Plan, agreed to initiate the development of a Neighbourhood Plan in 2015. The Parish Council communicated its intention to residents through its parish-wide newsletter, with an article in the local press and posters around the parish. Following these actions, a Public Launch event was held at the Parish Centre on 31st March 2015 to introduce and explain more fully the concept and the importance of the Neighbourhood Plan to residents and receive input from the community on issues and concerns. Attendees were invited to use post-it notes to input their thoughts on a series of broad questions: what they like about the Parish, what they dislike, ideas for the future and areas to be safeguarded.

2.5. This exercise was repeated at each of the settlements: Bricket Wood (19 May 2015), Chiswell Green (30 May) and Park Street (4 July). The Annual Parish meeting on 30 April provided a further opportunity to share with the local community the programme ahead.

2.6. **Working Groups:** A summary of the feedback gathered across each of the events was collated, which enabled the Steering Group to consider five themes to underpin the work ahead:

- Housing
- Green Spaces and the Environment
- Transport and Movement
- Community Facilities
- Local Economy



The Working Group Briefing Session

Each theme was allocated a Working Group comprising a Chair from the Steering Group and volunteers from the community who had expressed an interest to get involved. A briefing session was held in August 2015, hosted by the Consultant, to set out the key tasks for the groups.

- 2.7. The Working Groups met regularly, defining issues, researching, data gathering, paying site visits and initiating dialogue with relevant organisations and individuals. This enabled them to contribute to an initial broad set of aspirations, which would be honed into a draft vision and objectives, to be tested with the local community.

Towards a Draft Vision	
Retaining the character of each village Protecting the Green Belt from inappropriate development	Preventing divisive gated communities and encourage attractive open front gardens
Ensuring that all green and open spaces , trees and woodlands receive maximum protection and enhance the natural environment	Providing health and medical centres within easy reach of all residents and sufficient education establishments for the young of the parish to attend without lengthy journeys by public transport
Providing leisure and recreation facilities commensurate with the needs of the community, including sporting activity centres	Providing an effective public transport service seven days a week and convenient and safe routes that encourage walking and cycling
Ensuring that housing developments include affordable properties for first time buyers and help keep younger people in the village	Maintaining all existing rights of way and creating new ones to establish a useable, linked-up network
	Managing traffic speed and reduce vehicles travelling through our villages to other destinations
	Supporting appropriate development for thriving local retail businesses and commercial activities

Main points identified for inclusion in the emerging Vision

- 2.8. The Working Groups also played a key role in putting together a detailed survey to the local community, described further in Stage II.

Stage II: Actions informing and involving the local community and businesses of the Plan and its progress (ongoing)

- 2.9. **Publicity and Interaction with the Community:** Since the inception of the Plan, local residents have been kept informed of the Plan's launch and progress, with special emphasis on important key stages such as Public Meetings, the Community Survey, Public Exhibitions and the Public Consultation. Communications have included:
- Regular Press Releases to local media
 - Tailored editorials and advertising in local Residents' Associations' magazines
 - Editorials submitted to other local organisations' publications.
 - Information sent to local schools and churches for use in newsletters.

- Numerous poster ‘campaigns’ supplemented with larger banners placed at strategic points in the Parish to publicise key stages, such as Public Meetings, the Community Survey, the Public Exhibition and the Public Consultation.
- Mailshots delivered to every household in the Parish at the initial launch of the Plan, to deliver the Community Survey and to announce the Regulation 14 Public Consultation.
- A dedicated set of webpages on the Parish Council website
- The St Stephen Parish triannual newsletter running regular updates on the Plan’s progress.



2.10. **Community Survey:** In July 2016, a Community Survey was created with questionnaires sent to every residence

Example poster

The Community Survey

defined by the Steering Group and the Working Groups, on the five topic areas. In addition, the Survey also included ‘lifestyle’ questions relating to the community’s general feelings about the Parish.

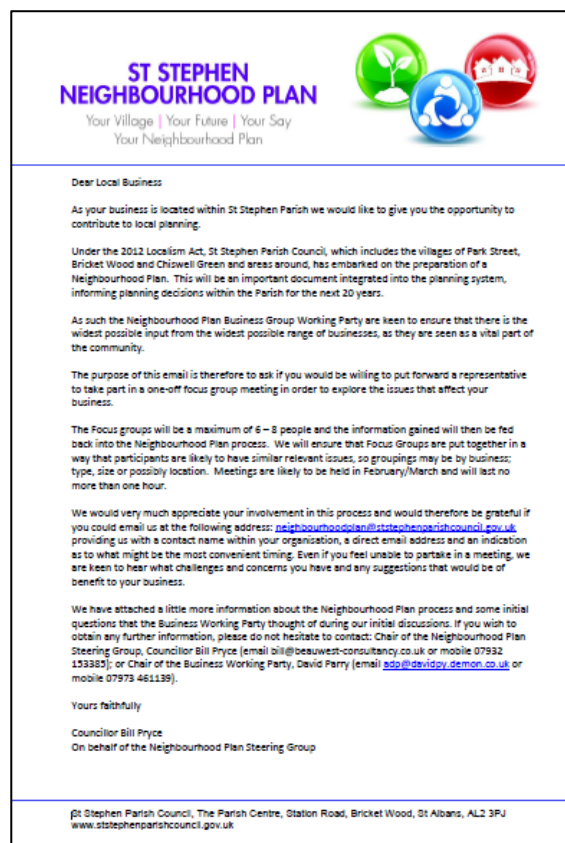
2.11. ‘Collection Boxes’ were placed in parish offices, local shops, post offices and doctors’ surgeries to collect completed questionnaires. Residents were also able to complete the questionnaire online. A total of 590 responses were received, equating to 11% of the households in the Parish. The results of the Survey provided the Steering Group and Working Groups with a still wider understanding of residents’ views and aspirations, enabling a further layer of refinement in the formulation of their Plan.

2.12. A summary of the findings can be found on the St Stephen Parish Council website: <https://ststephen-pc.gov.uk/wp-content/uploads/2020/11/7.-2016-Neighbourhood-Plan-Survey-results.pdf>. The findings enabled the Steering Group to develop an evolved Vision and Objectives.

2.13. **Topic based research and engagement:** Alongside the Parish-wide community survey, each of the Working Groups undertook research and engagement on topics specific to them:

2.14. The Local Economy Working Group developed a list of all businesses operating in the Parish and wrote to them to seek views and also invite them to take part in one of two Focus Groups, one for larger businesses and the other for smaller ones. Topics discussed included transport, workforce issues, supplies and expansion plans. The group also visited retail and other outlets in the Parish to make contact and seek views.

2.15. The Community Facilities Working Group undertook an initial analysis of the Strengths, Weaknesses, Opportunities and Threats for facilities in the Parish. They prepared a comprehensive detail of what facilities were available and future plans for them. Meetings with residents' associations were held and older people's groups. Finally, a Youth Survey was created with input from the local Scouts group, to understand what facilities older children/teenagers wished to see in the Parish.



Letter sent to local businesses

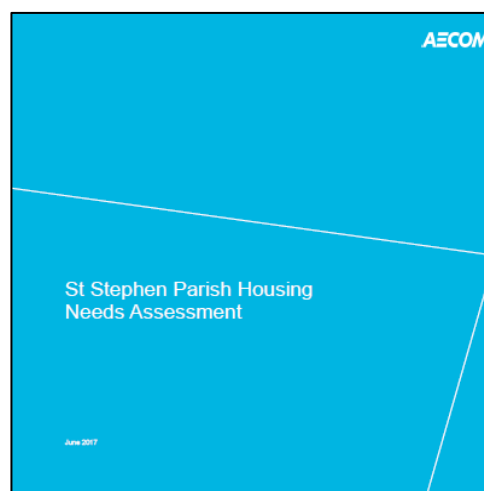
2.16. The Transport and Movement Group undertook research including into the following topics: cycleways, footpaths, bridleways, public transport, car parking (including for commuters and for use by those accessing local shops), traffic congestion and road conditions. Members of the group explored existing policy and its impact on St Stephen Parish, including the Hertfordshire County Council Local Transport Plan, as well as implications for future works in the area, such as improvements to the Abbey 'Flyer' rail line and bus services. Some of the topics discussed were considered to be beyond the scope of the Neighbourhood Plan, but nevertheless were important issues raised by the community and were, therefore, included in the Non-Policy Action table. The more localised issues, such as traffic pinchpoints and the need to promote active travel, provided valuable detail for the Plan.

2.17. The Green Spaces and the Environment Group prepared a detailed profile as evidence to underpin the Neighbourhood Plan. This included information gathered on local green assets in the Parish and drew on discussions held with a range of parties including District Council officers, local walking groups and the River Ver Society. The group prepared the justifications for the spaces nominated for Local Green Space designation, and prepared information on other local features of the Parish including woodland, the river system and the wider network of green infrastructure.

2.18. The work of the Housing Working Group is described below.

Stage III: Exploring potential sites for development

2.19. In parallel with the work taking place to engage the local community and the activities of the Working Groups, the Steering Group considered whether the Neighbourhood Plan should explore the allocation of sites for housing. Whilst the feedback from the local community revealed a keen desire to protect the Green Belt, comments were also received about the cost of housing locally and the lack of availability of smaller homes, in particular suited to those wishing to downsize and those entering the housing market (both for sale and to rent). There were already some sites with planning permission within the Parish and the emerging Local Plan at the time was seeking to allocate 'broad locations' for largescale development. Nevertheless, what these did not address, potentially, was housing needs at the local community level.



Local Housing Needs Assessment

2.20. Early on in the process, therefore, AECOM was commissioned to carry out a local Housing Needs Assessment for the Parish to provide additional local detail on the numbers of houses that might be required within the Parish over the period of the Plan and also the type and tenure of these. The final ¹report, published June 2017, suggested a figure of between 875 and 900 dwellings would be required to address housing needs over the period to 2032, equating to 90 properties a year.

2.21. While this report was being compiled, the Steering Group initiated a local Call for Sites, inviting local landowners, developers and others to submit any land that they wished to be assessed for the purposes of the Neighbourhood Plan. The Call for Sites was advertised online, in the local press and with local agents.

2.22. The local Call for Sites, combined with the list of sites previously submitted to St Albans City and District Council (SADC) as part of its Call for Sites programme, brought about a list of potential sites totalling circa 80. AECOM were again commissioned to assess each of the sites to understand which would be suitable and available for development. The Steering Group contributed to the site assessment pro-forma by adding some additional criteria felt to be important at the local level, for instance whether the site fell within the Watling Chase Community Forest Area.

2.23. The assessment process led to a longlist of sites that were potentially suitable for development. All of these were located in the Green Belt; early discussions with SADC revealed support for the Neighbourhood Plan to amend the Green Belt boundaries, in line with the updated National Planning Policy Framework, and to allocate sites within the Neighbourhood Plan. It was confirmed by officers that a strategic need for such amendments would be identified in the

¹ https://ststephen-pc.gov.uk/wp-content/uploads/2020/11/4.-St-Stephen-Parish-Housing-Needs-Assessment_FINAL.pdf

emerging Local Plan, which was anticipated to be adopted well in advance of the Neighbourhood Plan.

- 2.24. **Public Sites Exhibition:** The longlist of potential sites was subject to public consultation at three events organised in each of the villages: These ‘What to build? Where to build’ meetings included a general introduction to the neighbourhood plan process and an overview of how the sites had been collated. Large maps of each of the sites were prepared and local people were given an opportunity to input their views on post-its, feedback forms or directly to the Steering Group.
- 2.25. The findings from the public engagement (shown in Appendix B combined with the finalised site assessments, led to a shortlist of six sites to be considered. The events also provided an opportunity to share the evolved vision and objectives with the local community, which was welcomed.
- 2.26. **Meeting with site promoters:** Each of the shortlisted site promoters was invited to meet the Steering Group to provide further information about what they had planned for their sites and to hear about the objectives of the Neighbourhood Plan. This was considered helpful in shaping the site allocation policies. Discussions were also held with SADC officers to gain feedback from their perspective.
- 2.27. A draft policy for each site, supported by evidence including why the sites no longer were considered to meet the Green Belt requirements was produced. Detail is enclosed in the Housing Report². These were to be included in the Regulation 14 Pre-Submission Version draft Neighbourhood Plan.

Stage IV: Creating the draft Plan

- 2.28. Following the Working Groups’ activities, the Community Survey, the Public Meetings, the AECOM Report and the Call for Sites, the Steering Group was able to prepare an initial draft of the Plan and, from this, a suite of both policies and actions to address the Plan’s vision and objectives. A public exhibition was held to share this information and provided a further opportunity for comment.



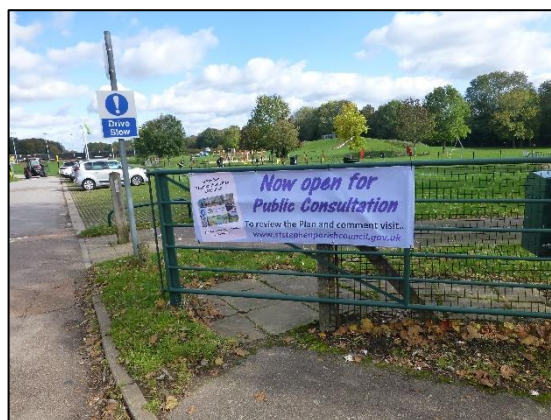
Public exhibition

² <https://ststephen-pc.gov.uk/wp-content/uploads/2020/11/6.-St-Stephen-Parish-Neighbourhood-Plan-Housing-Report.pdf>

- 2.29. It was not until this stage of the work – where an initial draft has been developed – that SADC were in a position to formally screen the Plan to ascertain whether or not a Strategic Environmental Assessment (SEA) and/or Habitats Regulations Assessment (HRA) would be required. The Parish Council prepared the screening documentation, which was issued for consultation with Historic England, Natural England and the Environment Agency in March and April 2019. The Screening Opinion, published in May 2019, concluded that an SEA would be required. It also concluded that an HRA was not required. A copy of the Screening Determination (May 2019) is contained in the Evidence Base.
- 2.30. The Steering Group had commissioned AECOM, via Locality, to prepare an SEA in anticipation of this being required. Due to the number of sites, this took some time to complete. There was also a growing concern about the ongoing delays to the Local Plan process, which has been anticipated to conclude well in advance of the Neighbourhood Plan; the emerging Local Plan would determine the ‘strategic need’ for minor amendments to the Green Belt to be made within the Neighbourhood Plan. It was considered at this time that the emerging Local Plan would still be adopted in advance of the Neighbourhood Plan.
- 2.31. At this time, the draft Neighbourhood Plan was presented to SADC for informal comments, which were integrated into the document.

Stage V: Preparing Pre-Submission (Regulation 14) Draft Neighbourhood Plan

- 2.32. Following the completion of the SEA, the Pre-submission Version (Regulation 14) Neighbourhood Plan was finalised in readiness for the Regulation 14 consultation, which ran for an eight-week period from 5 October to 30 November 2020. This was extended to take account of the challenges posed to engagement by the Covid-19 pandemic. It should be noted that the emerging Local Plan was still being examined at this point, and there was a concern about what the outcome of that examination might be. To this end, a Notice was included in the Regulation 14 consultation draft to the effect that should the Local Plan not succeed at examination, the sites contained within the Neighbourhood Plan would need to be removed, given that it was the emerging Local Plan that would have provided the strategic need to amend Green Belt boundaries, as set out in the NPPF.



One of the publicity banners

- 2.33. The Consultation was publicised on the Parish website, via social media, local Residents’ Associations’ magazines and other organisations’ newsletters. Additionally, a mailshot was delivered to every property in the Parish, posters placed in local retail outlets, public houses, bus shelters and Parish notice boards and larger banners displayed at strategic points in the Parish.

St Stephen Neighbourhood Plan

...now open for Public Consultation

The St Stephen Neighbourhood Plan is based upon the thoughts, concerns and aspirations of local residents, as identified by the Community Survey – sent out to every household in the Parish – and numerous public meetings. The Plan covers five distinct topics (described below) and a resultant 29 policies, which will sit alongside the St Albans City and District Council Plan.



Housing - Understanding needs and shaping development appropriately

There is a recognised need for affordable housing to enable younger families to remain or move into a parish where the average age of residents is far older than the national norm and also for smaller dwellings suitable for downsizing. Five sites have been identified primarily on land which, whilst technically in the Green Belt, do nothing to enhance the appearance of the local area.



Green Spaces and Environment - Green spaces, footpaths, woodlands, rivers

Any development must be appropriate to the character and features of St Stephen Parish and be expected to minimise environmental impact, including the protection of river corridors, wildlife habitats and woodlands and mitigate the effects of climate change. It is essential that identified Green Spaces within the Parish are protected and retained and seven such sites have been identified.



Transport and Movement - Public transport, traffic, parking, cycling and walking

The Plan is limited in what it can do to tackle transport issues, as these are dealt with by Hertfordshire County Council. The Plan does, however, suggest improvements to many of the major road junctions within and adjacent to the Parish, reduce traffic, ease congestion and, in turn, promote a cleaner and safer environment. Public transport needs are addressed in terms of improved bus and rail services.



Community Facilities - Improving and developing community and leisure facilities

The Plan seeks to ensure that there are sufficient medical, educational, recreational and general community facilities for residents of all ages and to ensure the long term future of such facilities. These range from the adequate provision of children's play areas, through to the protection of public houses and the need for retirement and care home accommodation.



Business & Local Economy - Supporting local commercial and retail enterprise

This section of the Plan addresses the need for a vibrant local economy through a suite of policies ranging from the preservation of retail outlets, supporting commercial operations providing local employment (including the reasonable expansion of existing businesses) through to the provision of high speed broadband to support all local commerce including home-based operations.

...time to “have your say”

The Plan has now reached its Public Consultation stage, providing the opportunity for residents and other bodies with interests in the Parish to “have their say” on the Plan's content and policies. The Plan can be accessed and comments made via the St Stephen Parish website (www.ststephenparishcouncil.gov.uk).

Residents without Internet access should contact St Stephen Parish Office on 01923 874867 for further information.

The Public Consultation will be open from the beginning of October and close at the end of November

At this point any necessary revisions will be made to the Plan which will then be sent to St Albans City and District Council, who will organise a further round of consultation, after which the Plan will be placed in the hands of an external Examiner for comment. The final stage will be the Public Referendum, with residents voting – with a simple Yes or No – on the Plan and its influence on the face of the Parish over coming years.

To review the Plan and comment visit...

www.ststephenparishcouncil.gov.uk

The flier sent to every property in the Parish

2.34. The Parish website included:

- The draft Plan
- An extract of the Plan's policies
- Details of how to comment on the Plan by either the online questionnaire (via an accessible link), by email or in writing.

2.35. The website also included additional relevant information and support documentation including:

- 'Quick Guide to Neighbourhood Plans'
- Neighbourhood Plan Community Survey results
- SEA Report – June 2020, AECOM
- SEA Report: Appendix A – Scoping Report for Consultation September 2019, AECOM
- Housing Needs Assessment June 2017, AECOM
- Site Assessment Report December 2017, AECOM
- Housing Report prepared by the Steering Group, October 2020

2.36. Alongside the community consultation, in accordance with the requirements of the Neighbourhood Planning regulations, relevant statutory consultees were notified and a range of other organisations considered to have a particular interest in the Plan were also written to. This included all of the owners of the Local Green Spaces. A list of consultees contacted is contained in Appendix C alongside a copy of the correspondence sent to them. Responses were received from the following:

- Historic England
- Natural England
- Environment Agency
- DPV for Castleoak ref. Land at Burston Nurseries
- St Albans District Council
- Highways England
- The Ramblers Association
- Turley on behalf of TARMAC
- Hertfordshire County Council
- DLA ref. land adjacent to Burston Nurseries, Chiswell Green
- DLA ref. Bucknalls Drive
- St Albans Cycle Campaign
- Aldenham Parish Council
- Bloor Homes
- Cllr David Parry
- British Horse Society

A summary of the comments received from these, with a response from the Steering Group, is contained in Appendix D.

- 2.37. Plans to hold a series of Public Meetings and Presentations to residents had to be negated due to the COVID-19 virus. These were replaced by an online ZOOM 'Presentation and Public Meeting' on Monday 9 November 2020, held in the early evening to capture 'workers'. This virtual meeting, advertised on the Parish website and by a second poster campaign, attracted over 50 attendees. The session was recorded³ and advertised on the Parish Council website for those unable to attend the Zoom session.
- 2.38. The virus also meant that the intention of placing hard copies of the draft Plan in local venues, such as doctor's surgeries, public houses and post offices, was also not possible. However, the Parish website advertised that hard copies would be made available to individuals on request.
- 2.39. A Consultation Survey was put together, available to complete online and also in paper form if required.
- 2.40. **Response to Survey:** The Consultation Survey attracted 89 completed online questionnaires during the eight-week period, although five without a name or postcode recorded have been discounted, leaving a net 84 responses containing 197 comments. When added to emails, letters and other responses over 250 comments were received. These comments were analysed and considered by the Steering Group with regard to amending or making additions to the draft Plan.
- 2.41. A summary of the responses from the community are included in Appendix E.

Stage VI: Preparing the Submission (Regulation 16) Neighbourhood Plan

- 2.42. The following paragraphs provide a summary as to the main comments about and revisions made to the Neighbourhood Plan following the Regulation 14 consultation:
- 2.43. **General comments:** The emerging St Albans Local Plan 2018 was withdrawn on 19 November 2020 following its Examination. This took place during the Regulation 14 consultation. This meant that all references to the emerging Local Plan had to be removed. Fundamentally, this meant removing the proposed site allocations from the Neighbourhood Plan as all of these relied on the amendment of Green Belt boundaries; the adopted Local District Plan Review 1994 pre-dates the NPPF and hence does not establish a strategic need to review Green Belt boundaries at a Neighbourhood level. The emerging Local Plan had been anticipated to be adopted in advance of the Neighbourhood Plan and would have established this.
- 2.44. Locality's Site Assessment for Neighbourhood Plans Guidance states: *"Where you cannot demonstrate that a site is deliverable, for example it may be in a good location but there is no evidence that it could become available, your plan can identify 'aspirations' for sites you would like to see developed, and set out principles for each site linked to plan policies."* Whilst the proposed site allocations have been removed from the Plan, the detail of those considered suitable are contained in the Housing Report accompanying the Plan and are considered as

³ <https://www.youtube.com/watch?v=d9y0lqVxEEQ>

Aspirational Sites that should be revisited in either a future review of the SSNP or as part of the new emerging Local Plan process.

- 2.45. The SEA Screening was reissued to take account of the fact that the sites had been removed from the Plan. A new Screening Determination Statement concluded that the Plan would not require an SEA.
- 2.46. This has led to some changes to the maps within the document.
- 2.47. **Character Heritage and Design policies:** The policies were largely supported by those responding to the consultation. Historic England queried whether there was scope to include a policy to consider local heritage assets and local character. The Steering Group agreed that this would be helpful and included a policy to ensure that any new development within the villages should be in-keeping with the prevailing character of the village. Furthermore, the group identified two non-designated heritage assets to be preserved – the Parish Barn, owned by the Parish Council, and St Luke’s Church, both in Bricket Wood – alongside acknowledging the non-listed historic assets maintained on the Historic Environment Record. The owners of these assets were contacted about the designation and supported this.
- 2.48. **Green spaces and the environment:** The owners of each of the proposed Local Green Spaces were contacted at Regulation 14 consultation. No negative feedback was received. The Environment Agency were very supportive of the policy to enhance the river setting, although they did raise concerns in the Strategic Environmental Assessment that accompanies the Neighbourhood Plan about the Ver and Colne rivers being susceptible to flooding. Therefore, the policy has been amended to support proposals that incorporate natural flooding mitigations, such as planting indigenous trees which help prevent soil erosion. The Steering Group discussed flooding more generally in the Parish and agreed that flooding has predominantly been an issue in relation to the maintenance of drains as opposed to a development issue.
- 2.49. **Transport and movement:** Hertfordshire County Council raised concerns about Policy S12 (Off-street car parking), which was felt to be in contrast to the country-wide aspiration to shift towards non-car modes of transport. This aspiration to move to more sustainable modes of transport is shared by the Steering Group, however a sense of realism was considered necessary in the context of St Stephen being a largely rural area with high car dependency when compared to the region and nationally. The motorway network cuts through the Parish and contributes significantly to traffic congestion. Lack of off-street parking is considered to exacerbate this, therefore, on balance it is felt appropriate to retain the policy intending to safeguard existing parking and replace it when it is lost. Furthermore, the policy has been amended to support EV charging points, which would still require parking spaces, albeit cleaner vehicles.
- 2.50. The policies relating to walking, cycling and horse-riding were strongly supported.
- 2.51. **Community facilities:** The feedback was very supportive. The policies on community facilities and local public houses have been merged for simplification.

2.52. **Business and local economy:** All policies were supported.

2.53. Following the revisions made to the Plan as a result of the Regulation 14 consultation, the amended Plan was approved at a meeting of St Stephen Parish Council on 18 February 2021. The Submission Version was submitted to St Albans City and District Council at Regulation 16 in February 2021. Assuming a favourable outcome, it will proceed to Examination and then to referendum.

3. STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATION ASSESSMENT

Strategic Environmental Assessment

- 3.1. The St Stephen Parish Neighbourhood Plan and the process under which it was made conforms to the SEA Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 3.2. A draft version of the Plan was screened in March/April 2019 to determine whether or not it required a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/ EC and associated Environmental Assessment of Plans and Programmes Regulations. A Screening Opinion was published in May 2019 stating that an SEA was required, primarily because of the inclusion of site allocations on previously undeveloped greenfield land and the potential impacts this might have.
- 3.3. Since that initial screening, changes have been made to the Neighbourhood Plan that warrant a new screening; all site allocations have been removed from the Neighbourhood Plan. This is due to the fact that all proposed sites were located in the Green Belt; the Neighbourhood Plan was seeking to amend the Green Belt boundaries, as enabled through para 136 of the National Planning Policy Framework, and allocate them for housing. Whilst the NPPF enables neighbourhood plans to make alterations to the Green Belt boundary, however, this can only happen where a need to do so has been established at the strategic level, in this case the St Albans Local Plan. St Albans had been working on a new Local Plan to replace the saved policies of the existing Local Plan Review 1994. It had been anticipated that the new Local Plan 2018 would establish a strategic need for the review of Green Belt boundaries at the neighbourhood level. It was also anticipated that the emerging Local Plan 2018 would have been adopted well in advance of the St Stephen Neighbourhood Plan. In fact, the emerging St Albans Local Plan 2018 was withdrawn on 19 November 2020 following its Examination. The existing adopted Local District Plan Review 1994 does not establish a strategic need to review Green Belt boundaries at the Neighbourhood level.
- 3.4. In January 2021, a rescreening was undertaken and consulted on with the three statutory bodies. This concluded that the Plan was unlikely to have significant environmental impacts and, therefore, an SEA would not be required.
- 3.5. Relevant representations were duly taken into account in the final version of the Sustainability Statement, which accompanies the Submission (Regulation 16) Version of the Neighbourhood Plan.
- 3.6. A copy of the Screening Determination Report is included in the Evidence Base.

Habitats Regulations Assessment (HRA)

- 3.7. Under Directive 92/43/EEC, also known as the Habitats Directive⁴, it must be ascertained whether the draft Plan is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulation Assessments ("HRA"). An appropriate assessment ("AA") is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.
- 3.8. The Screening Assessment, consulted on with Natural England (the statutory body) concluded that an HRA would not be required because the Plan is not likely to have significant impacts on European protected species or sites.
- 3.9. A copy of the Screening Determination Report is included in the Evidence Base.

⁴ https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

4. CONCLUSION

- 4.1. The Steering Group has undertaken a very thorough engagement programme in order to develop the St Stephen Neighbourhood Plan. It has set out agreed vision and objectives, which will be addressed through a range of both planning policies and non-policy actions.
- 4.2. Feedback from St Albans City and District Council and from the Regulation 14 Consultations has enabled the Plan to be shaped into its final version, to submit to the District Council.
- 4.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012.
- 4.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Group and Working Groups as well as those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Neighbourhood Plan.

Appendix A: Timeline summary of significant engagements, events and activities

YEAR	MONTH	ACTIVITY
2014	January	Decision by St Stephan Parish Council to imitate development of a Neighbourhood Plan
2014	April	Neighbourhood Plan boundary designated
2014	September	Dedicated webpages set up on the Parish Council website
2015	January	Publicising Plan to local residents via the Parish Newsletter announcing NP and recruiting volunteers to work alongside Parish councillors
2015	February	Initial meeting of Steering Group
2015	March	Public Meeting at Parish Centre to formally launch the Plan
2015	May to July	Launch drop-in events at each of the villages
2015	August	Briefing session held for Working Group volunteers
2015 / 2016	September to March	Working Groups analysing information received from the drop-in events and gathering evidence about their topics, to develop a draft vision and objectives
2016	July	Community Survey questionnaire delivered to every property in the Parish, with option to complete online or by hard copy. Collection points for hard copy completion throughout the Parish.
2016	Throughout	Working Group meeting with stakeholders around the Parish Regular press releases and newsletters
2016	September / October	Focus Group meetings with local businesses
2016	October to December	Youth Survey
2017	January to June	Local Housing Needs Assessment undertaken
2017	February to April	Local Call for sites
2017	May	Series of Public Meetings to discuss the sites
2017	April to August	Site assessment report (AECOM)
2017	June to September	Meetings with individual site promoters
2018	To May	Policy options prepared
2018	June	Public Exhibition on policy options
2018	July to December	Initial draft Plan prepared
2019	March to May	SADC organise screening of the draft Plan and informal comments
2019	Throughout	Strategic Environmental Assessment work (AECOM)
2020	January to July	Pre-Submission Version draft Plan finalised
2020	October	Pre-Submission Consultation (Regulation 14) 5 October – 30 November (Emerging SADC Local Plan withdrawn following examination)
2020/21	December to February	Finalising Submission Version Plan and re-screening for SEA requirement (ascertained no longer required)
2021	February	PC sign off Submission Version Plan and submit to SADC

Appendix B: What to Build? Where to Build? Sites engagement

WHAT TO BUILD? WHERE TO BUILD?

Public Meetings:

Bricket Wood 9 May 2017; How Wood 10 May; Chiswell Green 15 May 2017

ANALYSIS OF COMMENT FORMS RETURNED AT MEETINGS

Notes:

Twenty five Comment Forms returned at three meetings, now numbered 1-25 for ease of reference and anonymity of respondent. The analysis is divided into **General Comments** and **Site-Specific Comments**; the respondent's return form number is given with each comment/comment summary. See individual forms at the Parish Office if further information is needed.

Analysis comments:

GENERAL COMMENTS:

- All sites in Bricket Wood not suitable for further development: village not designed for further housing, already problems of traffic exiting village, pollution **(19)**.
- Protection of Green Belt vital; concerns about increased traffic (especially Park Street); lack of schools, doctors for increased population; **(20)**.
- So sad to see green belt and green spaces ruined by developing and overcrowding – use brownfield sites **(21)**;
- Do not take away our Green Belt land **(17)**;
- Roads over-crowded; hospitals overfull; difficulty of getting hospital and doctors' appointments; air polluted **(17)**;
- All brownfield sites should be used before Green Belt (release) is even considered; better to consider Rail Freight Terminal site for housing rather than destroy 'village community'; infill of green areas will have serious impact on community's wellbeing **(18)**;
- Use larger (brownfield) sites, eg Harperbury Hospital **(17)** & Bricket Wood Sports Centre **(14)**; development should be on brownfield sites, or infilling of existing spaces – not expansion of existing boundaries **(6)**;
- Increased pollution from each development **(22)**;
- Need for Plan to deal with problems of Mount Pleasant Lane (MPL) junction with M1 slip road in Bricket Wood (BW) if more housing in BW; MPL already 'rat run'; problems of bus delays **(23)**;
- Need to avoid 'affordable homes' being sold off-plan to 'buy to let' **(23)**;
- Need to bring S106 money into BW –community facilities disorganised **(23)**;

- All sites (BW especially): severe access problems: almost all therefore unacceptable and will probably cause the NP to be rejected on grounds of no provision for housing **(24)**;
- Need for smaller dwellings for older people – not 4-5 bedroom houses **(12)**;
- Need more affordable homes for local young people – not executive homes; need more provision for aging community **(14) (20)**;
- Improve subway under A414 for pedestrian use, with S 106 monies. Liable to flooding **(15)**;
- More homes need infrastructure for whole community –more school places, surgeries for doctors and dentists, shops etc. – especially for larger sites **(14)**;
- Very interesting exhibition; some sites with potential for improved rights of way **(25)**; (NB Ramblers PE: JB & DE Green Spaces contact with PE).

SITE-SPECIFIC COMMENTS:

- **L1:** Perfect for bungalows **(1)**;
- **L1:** Rounds off residential location; community benefit from new church & community hall; should be approved **(16)**;
- **L3:** Possible as on main road **(17)**;
- **L4:** No development: with BRE development, this would increase traffic using Bucknalls Drive & Mount Pleasant Lane to unacceptable level **(16)**;
- **L5:** Proximity of SRFT? No mention of site between Hyde Lane & Moor Mill Lane **(1)**;
- **L2:** All Green Belt should remain as boundary; If site developed need for 20m tree-planted bund between Noke Side & Long Fallow; gardens to run up to bund to prevent public access **(2)**;
- **L6:** Old Orchard land refused development recently: now revised layout 10 dwellings leading to increased traffic and access problems; development a pressure to develop adjoining land, joining Park Street to A414 **(3)**;
- **L7a:** Access to and from site? Surely not A405 - very heavily used, particularly at rush hours **(4)**;
- **L7a:** Regret if BT Garden Centre & Fisheries goes; need to examine access – already v difficult **(5)**;
- **L7a** New bridleways needed to link in with existing; large public open space; should go forward **(16)**;
- **L7b:** Access to/from A405 very dangerous & completely unacceptable; bund on north side vital to reduce noise & pollution – must be retained **(4)**;
- **L7b Donkey Field:** too close to M25 – leave land as buffer **(5)**;
- **L7b** Useful green lung for heavily polluted area; use for tree-planting; scout hut & facilities; tea room ? No residential **(16)**;
- **L8:** Unaffordability of detached bungalows **(6)**;

- **L8:** As long as no further Green Belt encroachment, should be used for 2-3 bedroom bungalows **(16)**;
- **L9:** Very limited space; nice Green Belt space with horses; noise from M25 **(7)**;
- **L9:** Continuing sewerage/foul water problem in Maplefield from too much building (see map on comment form); Need to upgrade sewerage system in Park Street Lane; no new developments – especially 35 new homes – without major & adequate infrastructure and upgrade **(8)**;
- **L9:** Part of land suitable for housing but only if does not extend beyond building line of opposite side of road; noisy polluted area – would benefit community for 2/3 site set aside for tree-planting (noise & pollution reduction); high-pressure gas main in field so possible problem for heavy tree planting by M25; ? Community orchard in middle, and residential nearest to Maplefield? Green buffer between Park Street & Bricket Wood would be retained by 2/3 tree planting & half-acre field on opposite side of M25 bridge in same ownership but not part of current application: field must remain open to achieve green buffer **(16)**;
- **L9:** poor condition of services (gas, water, electricity) in Park Street Lane (PSL) so cannot cope with more houses; concerns about more traffic in PSL because of narrow pathways, increased risk of pedestrian accidents **(20)**;
- **L9:** concern about development: gas pipes under field, railway line and M25; loss of access from houses into fields **(21)**;
- **L11:** Green Belt land - valuable green space would be eroded; (Lack of) school places **(9)**;
- **L11:** Green Belt land – green space separating How Wood & Park Street with good community use & horse-riding facilities; if developed would lead to pressure for access from cul-de-sacs at Hawfield Gardens and development of ransom strip owned by different party at end of Hawfield Gardens.; development could also lead to pressure to build on land adjacent to railway footpath **(10)**;
- **L11:** Important wildlife corridor & green lung linking water meadows at Bricket Wood to Greenwood Park and beyond **(11)**;
- **L11:** Land should never be built on – would change entire area and ethos; Green Belt land **(17)**;
- **L11:** Development of **L1** means that this land must remain open as green buffer **(16)**;
- **L12:** Seems sensible place for housing; land behind Baptist Church also good place **(12)**;
- **L12:** Green Belt must be protected: if site developed no distinct boundary between Park Street & Chiswell Green; TPOs in place along perimeter of smaller parcel of land; road cannot handle extra traffic – already difficulty for emergency vehicles & delivery lorries **(18)**;
- **L12:** Ideal for houses but need for enough off-road parking and widening of road adjacent to Orchard Drive; playground at top of Orchard Drive one of best around and should remain! **(13)**;

- **L12:** Coalescence of Park Street and Chiswell Green if this Green Belt lost; road too narrow – need to widen road and provide parking bays **(14)**;
- **L13:** Fields eroded; Green Belt land **(9)**;
- **L13:** Need for more houses **designed** for elderly; need for safeguards to ensure developers deliver on this **(15)**;
- **L13:** Good use for older people's dwellings – close to station, bus routes; but could lead to L6 development with downside of moving habitation closer to A414 & losing green space between St Albans & Park Street. (?? L6 comments not present – DE) **(12)**;
- **L14:** extra traffic (problem) **(9)**;
- **L14:** Use for bungalows & low density **(16)**;
- **L16:** No luxury homes – 1/2/3 bedroom houses/cluser homes/bungalows; need for car parking above required number **(16)**;
- **L18:** All Green Belt to remain as boundary; if site developed, need for 30 me tree-planted bund; gardens to border bund so public roads do not border Long Fallow & Forge End **(2)**;
- **L19:** Community Forest on contaminated land – SADC aware; planning permission already refused; location unhealthy **(5)**;
- Contaminated area: no objections if remediation work done **before** any homes sold; large houses would allow remaining site to be left as public open space and essential green lung on this side of M25; potential for additional bridleway & footpath **(16)**;
- **L20:** No large luxury detached houses: no objections for terraced homes in stable blocks to match existing character of Colney Street; remainder of site not included in plan must remain undeveloped to retain open character of Smug Oak Lane & rural feel: v important because of proximity to M25, flyover and SRFT **(16)**.

Appendix C: List of statutory consultees and correspondence sent at Regulation 14

The following statutory consultees and other interested parties were contacted at Regulation 14:

County and District Contacts	Email addresses
St Albans City and District Council	Planning.Policy@stalbans.gov.uk chris.briggs@stalbans.gov.uk
Hertfordshire County Council	spatialplanning@hertfordshire.gov.uk ecology@hertfordshire.gov.uk minerals.planning@hertfordshire.gov.uk
Hertsmere Borough Council	local.plan@hertsmere.gov.uk
Three Rivers District Council	trldf@threerivers.gov.uk
Watford Borough Council	strategy@watford.gov.uk

Parish Councils adjoining the neighbourhood area	Email Address
London Colney PC	parishclerk@londoncolney-pc.gov.uk
Shenley PC	clerk@shenleyvillage.org
Aldenham PC	manager@aldenham-pc.gov.uk
Abbots Langley PC	info@abbotslangley-pc.gov.uk (Tim Perkins)
St Michael PC	http://www.stmichaelpc.org.uk/contact-us/

Statutory Bodies / other organisations	Email Address
Coal Authority	planningconsultation@coal.gov.uk
Homes and Communities Agency	mail@homesandcommunities.co.uk
Natural England	consultations@naturalengland.org.uk
Environment Agency	HNLsustainablePlaces@environment-agency.gov.uk
Historic England	eastplanningpolicy@HistoricEngland.org.uk Andrew.marsh@historicengland.org.uk
Network Rail	TownPlanning.LNE@networkrail.co.uk

Statutory Bodies / other organisations	Email Address
Highways Agency	info@highwaysengland.co.uk eric.cooper@highwaysengland.co.uk planningEE-@highwaysengland.co.uk
Marine Management Organisation	Not required
Herts Valley Clinical Commissioning Group	Planning.Enquiries@Hertsvalleysccg.nhs.uk
Hertfordshire Community NHS Trust	communications@hct.nhs.uk
Affinity Water Ltd	nicolas.gilbert@affinitywater.co.uk
Thames Water	devcon.team@thameswater.co.uk ThamesWaterPlanningPolicy@savills.com
UK Power Networks	Luke.Hughes@UKPowerNetworks.co.uk
Herts Local Access Forum	LAF.Admin@hertfordshire.gov.uk
Vodafone and O2	EMF.Enquiries@ctil.co.uk
Sport England	planning.south@sportengland.org roy.warren@sportengland.org
Woodland Trust	enquiries@woodlandtrust.org.uk
Herts and Middlesex Wildlife Trust	planning@hmwt.org
St Albans CVS	memberservices@communities1st.org.uk
Forestry Commission	fe.england@forestry.gsi.gov.uk
Hertfordshire Local Enterprise Partnership	info@hertfordshirelep.co.uk
St Albans Chamber of Commerce	events@stalbans-chamber.co.uk
Churches Together St Albans	peter@ctstalbans.org.uk
Ver Valley Society	John.fisher@btclick.com

Green Space owners:

Green Space	Owner / Email Address
1. Ashridge Drive, Bricket Wood	SADC
2. Broad Acre Woodland, Bricket Wood	SADC
3. Juniper Avenue, Bricket Wood	SADC
4. Forefield, Chiswell Green	SADC
5. South Close, Chiswell Green	SADC
6. Sunnydell, Chiswell Green	SADC
7. Mayflower Road / Orchard Drive playground and recreation ground, Park Street	SSPC

The following correspondence was sent:

Dear Consultee

St Stephen Parish Neighbourhood Plan – Pre-Submission Consultation (Regulation 14)

I am pleased to invite your views on St Stephen Parish Council's proposals for a neighbourhood development plan and associated documents.

This is a Pre-Submission Consultation in accordance with the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended).

The following consultation documents may be found at the link below on the St Stephen Parish Council website:

- The St Stephen Parish Neighbourhood Plan
- Strategic Environmental Assessment
- St Stephen Local Housing Needs Assessment
- St Stephen Parish Neighbourhood Plan Site Assessment Report
- Housing report
- Additional evidence base documents

<https://www.ststephenparishcouncil.gov.uk>

Please note that the Pre-Submission Version St Stephen Parish Neighbourhood Plan has been developed in parallel with the emerging St Albans City and District Local Plan, which was

anticipated to be adopted before the Neighbourhood Plan. The policies in the St Stephen Neighbourhood Plan conform to the adopted saved policies of the St Albans District Local Plan Review (1994) and also synchronise with the emerging policies of the emerging Local Plan. There is now a strong possibility that the emerging St Albans Local Plan will not progress as previously scheduled. If this occurs, it will directly impact a number of the proposed policies in the Pre-Submission St Stephen Parish Neighbourhood Plan, namely the following sections:

- Policy S1: Spatial Strategy
- Policy S2: Housing Scale and Location
- AIM 3: Community facilities at the Donkey Field
- Policy S20: Burston Nurseries
- Policies S25 to S29: Site allocations

If the emerging Local Plan does not progress, these policies would not form part of the Submission Version Neighbourhood Plan.

A decision on the emerging Local Plan is yet to be taken, therefore these policies are retained for the purposes of the consultation and your views on them are welcomed.

Please submit your responses to the consultation to:

**Parish Clerk
The Parish Centre
Station Road
Bricket Wood
St Albans
Herts
AL2 3PJ**

Alternatively you may email your responses to: clerk@ststephenparishcouncil.gov.uk or complete our Neighbourhood Plan questionnaire: <https://www.surveymonkey.co.uk/r/StStephenNPReg14>

The consultation period runs for eight weeks from Monday 5 October to Monday 30 November. This is an extended consultation to take account of the restrictions imposed as a result of the Covid-19 outbreak.

Responses must be received by 5pm on Monday 30 November 2020.

I look forward to hearing from you.

Yours sincerely

Bill Pryce

Chair, St Stephen Parish Neighbourhood Plan Steering Group

Appendix D: Summary of Regulation 14 statutory consultee responses

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			
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.

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

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

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

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

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

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
		(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>

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
			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 point here is that our HNA and wider housing structure/pricing is essentially reinforcing the findings of the SHMA.

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

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
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>- 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>

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
		<p>- BREEAM standards require specific assessment – how 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.

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
		<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>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>

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
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.	Amend.
62.	15. D Parry	Area 7 on the list is within Green Belt. Can we protect 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, 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.

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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.	"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>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.</p>	<p>Agree – add sentence to supporting text and include in policy.</p> <p>Noted.</p> <p>Noted.</p>
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.

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
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.”	Noted.
Transport and Movement			
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.

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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	<p>Point 1: Car parking should favour those with limited access to other modes of (sustainable) transport.</p> <p>Point 2: Object – providing car parking can negatively impact the uptake of sustainable modes of transport.</p> <p>Recommend deletion as it is contrary to NPPF objectives on sustainable development and HCC’s adopted LTP4.</p>	<p>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 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>

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			<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	<p><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 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 <u>public transport use</u> 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</p>

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			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.”
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>
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:</p> <p><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</i></p>	<p>This may need to be an associated action alongside the policy – adopting of footpaths.</p>

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		<i>road the dedication must run from one adopted highway to another."</i>	
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.
90.	16. British Horse Society	Strongly support.	Noted.
Community Facilities			
Policy S15: Community Facilities			
91.	4. DPV	Support.	Noted.

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
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. <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</i>	Agreed.

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		<i>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?	Noted.
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 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	Noted.

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		<p>suitable for cyclists and equestrians and not just for pedestrians.</p> <p>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.</p>	
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	<p>Paragraph 9.4 page 62 Local Access Issues</p> <p>We note this paragraph contains the only reference to the proposed Strategic Rail Freight Terminal</p>	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			
108.	4. DPV	Support.	Noted.
Policy S23: Protection of Existing Employment Premises or Land			
109.	4. DPV	Support.	Noted.
Policy S24: High Speed Broadband			

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

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		<p>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 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.</p>	

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

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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.
122.	11. DLA for Bucknall’s Drive	Would welcome a discussion with the PC about how the site could be delivered in spite of the withdrawal of the Local Plan. Recommend wording change to policy ‘approximately’ instead of ‘a minimum of’.	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? Noted.

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123.	15. D Parry	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.	Noted.
Policy S29: Land at Frogmore, Park Street			
124.	3. EA	As this is in floodzone, could the areas within the floodzone be incorporated as open space on the site? Wording: “v. All built development is located outside of flood zones’.	Noted.
125.	15. D Parry	It is not appropriate for me to comment on this site, due to professional interest.	Noted.
Implementation and Monitoring			
126.	7. Ramblers	Paragraph 11.5. We suggest adding the word Paths to the first sentence so that it reads: “Any of the above could include new roads, paths and transport”	Agreed.
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.

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
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	<p>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.</p> <p>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 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</p>	<p>Noted.</p> <p>Noted.</p>

Comment Ref.	Respondent Ref:	Feedback given	Response from Steering Group
		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.	
Strategic Environmental Assessment			
130.	5. SADC	In light of the above comments, you may been to consider the implications of your SEA work	Approach AECOM to query.

APPENDIX E: Summary of feedback received from the local community

The table below summaries the responses received in the Regulation 14 Survey.

POLICY	DESCRIPTION (abbreviated)	STRONGLY AGREE / AGREE %	NIETHER AGREE OR DISAGREE %	DISAGEEE / STRONGLY DISAGREE %
S1	Spatial Strategy	66	16	18
HOUSING				
S2	Housing Strategy	68	11	21
S3	Dwelling Mix	63	24	13
S4	Design of Development	68	17	14
GREEN SPACES AND THE ENVIRONMENT				
S5	Environmental Impact	90	6	5
S6	Protection of Habitats	92	5	2
S7	Local Green Spaces	87	8	5
S8	Ver and Colne Rivers	95	3	2
S9	Green Infrastructure	87	11	2
TRANSPORT AND MOVEMENT				
S10	Toad Junctions / Pinch Points	87	10	3
S11	Off-street Parking	85	11	3
S12	Bus Services / Transport	81	16	3
S13	Walking and Cycling	87	10	3
S14	Bridleway Network	85	11	5
COMMUNITY FACILITIES				
S15	Community Facilities	83	12	5
S16	Facilities for Children	84	10	6
S17	Public Houses	77	18	5
S18	Allotments / Growing Spaces	78	19	3
S19	Retirement / Care Homes	84	15	5
S20	Burston Nurseries	73	16	11
LOCAL ECONOMY				
S21	Expansion of Businesses	76	13	11
S22	Village Retail Areas	85	11	3
S23	Protection of Employment	79	14	6
S24	High Speed Broadband	90	7	3
SITE ALLOCATIONS				
S25	Orchard Drive	50	32	18
S26	Baptist Church	57	28	15
S27	South of Park Street Lane	45	35	20
S28	Bucknalls Drive	48	26	26
S28	Frogmore	50	32	18

The comments received from residents and other parties via the online survey, email and hard copy were strongly supportive of the Plan. An Excel spreadsheet of all responses, including full comments, is contained in the Evidence Base. A summary of the comments is provided below:

Spatial Strategy / Housing Policies (34 comments)

- Concerns of how to ensure developers build smaller dwelling rather than larger units.
- The need for adequate off-street parking.
- Mixed reaction to releasing land from Green Belt for development, as can be expected.
- The need for smaller properties / sheltered accommodation for elderly residents to downsize into.
- Concern over state and size of local roads. Need for roads and facilities to be improved to cope with increased population.
- Need to enable younger families moving into the area / affordable properties for first-time buyers.
- Need to retain 'village feel'.
- Protection of Green Spaces to protect against 'in fill' development.
- Concern (and confusion) over development of former Radlett airfield – Garden Village or Strategic Rail Freight Terminal - and the impact of both projects on local facilities and traffic.

Green Spaces and the Environment Policies (28 comments)

- Strong reiteration for the protection of Green Spaces.

Transport and Movement Policies (31 comments)

- Protection of footpaths, bridleways and Rights of Way.
- Safe cycling routes.
- Concern over trend of narrow roads in new developments.
- Concern over major and minor road junctions - congestion and danger - potential accident black spots.
- Realistic number of off-street parking places included with new developments.
- Improvements to Abbey rail line strongly supported to provide viable road transport alternative.
- Concern over HGV traffic short-cutting through villages.
- Mixed comments regarding parking at village shopping areas, some supporting greater restrictions, others favouring 'freeing up'.
- Inadequate bus (and rail) services leading to greater car use.

Community Facilities Policies (19 Comments)

- Strong support for care homes / retirement homes.
- Strong support for improved facilities for younger people, including playground facilities and 'clubs'.
- Social facilities form older residents.
- Need for Medical Centre in Bricket Wood.

Local Economy (18 Comments)

- The importance of broadband connectivity for stressed by a high number of respondents.
- Mixed comments regarding new or expanding businesses in the Parish; the size of such developments, impact of location within residential areas.

Site Allocation Policies (27 comments)

The comments received were fairly mixed, perhaps not unsurprisingly given the desire among many to retain the Green Belt as it is. As the sites have now been removed, the comments will be retained and this aspect of the Plan will be revisited in an update once the emerging Local Plan has been adopted.