

## Buntingford Community Area Neighbourhood Plan 2014-2031 – Referendum March 2017

Name	Organisation	Summary of Comments
Richard Butler	Bidwells on behalf of the St Albans Diocesan Board of Finance	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• Policy HD1; Object – the policy applies greater restrictions on development in Group 3 Villages than the policy relating to village development in the emerging District Plan. Consideration should be included into the policy for small scale appropriate development in settlements other than Buntingford and Cottered.</li> </ul>
Richard Butler	Bidwells on behalf of the St Albans Diocesan Board of Finance	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• Policy HD1; Object – Promotion of a site outside the settlement boundary for development. Consideration should be included for future development beyond the plan period to boost the supply of housing and facilitate improvements to community infrastructure.</li> </ul>
Neil Osbourn	DLP on behalf of Messrs, Wattsdown Ltd, and Bovis Homes	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• General; the East Herts Local Plan is not up-to-date and, as a consequence, there is no strategic basis for some of the neighbourhood plan policies. The public interest would be better served by delaying the progress of the Neighbourhood Plan until the East Herts District Plan is adopted.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Policy HD1; Object – policy does not have regard to the NPPF as it imposes restrictions on development in the absence of an up-to-date objective assessment of housing need.</li> <li>• Policy HD1; policy is strategic in nature and goes beyond what may be considered appropriate in a neighbourhood plan.</li> <li>• Policy HD1; it is not within the gift of a neighbourhood plan to define a settlement boundary, where such boundaries are a factor of the strategic needs of the district as a whole.</li> <li>• Education, Business and Employment; the settlement boundary identified in the Neighbourhood Plan could restrict the ability of the Local Planning Authority to deliver economic growth opportunities in the town, and the ability to deliver a new first school site.</li> <li>• Landscape; specific reference made to a planning application on a site to the west of Buntingford where environmental screenings have not identified a significant impact on the landscape.</li> </ul>
Neil Osbourn	DLP on behalf of Taylor Wimpey	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• General; preparation of the Neighbourhood Plan is premature in</li> </ul>

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		<p>advance of the adoption of the East Herts District Plan.</p> <ul style="list-style-type: none"> <li>• General; it is not the role of a neighbourhood plan to determine how much development a town will need, but rather support the strategic policies set out in an up-to-date local plan.</li> <li>• Regard to NPPF; the Neighbourhood Plan fails to demonstrate that it would support strategic development needs in accordance with paragraph 16 of the NPPF.</li> <li>• General; the East Herts Local Plan is not up-to-date and, as a consequence, there is no strategic basis for some of the neighbourhood plan policies. The public interest would be better served by delaying the progress of the Neighbourhood Plan until the East Herts District Plan is adopted.</li> <li>• Policy HD1; Object – the Neighbourhood Plan does not seek to plan positively and provide opportunities for new housing.</li> <li>• Policy HD1; Policy is strategic in nature and could affect the ability of the local Planning authority to meet the strategic housing need.</li> </ul>
David Barker	Evolution Town Planning on behalf of	Comments as follows:

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	Pigeon Land Ltd	<ul style="list-style-type: none"> <li>• General; support the aims of the local Town and Parish Councils in producing the Neighbourhood Plan.</li>   <li>• General; hope to see the Neighbourhood Plan successfully adopted and be an asset to the area.</li>   <li>• Policy ES1; the policy should also state that developments which would provide benefits to the area should be permitted as this would provide some flexibility to allow development that would assist in the delivery of sustainable development in the area.</li> </ul>
	Gladman	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• General; it is imperative to the Plan's ability to meet the basic conditions that it provides sufficient flexibility so that it is able to respond positively and react to changing circumstances in the wider area.</li>   <li>• Policy HD1; policy will need updating as it restricts housing development in some settlements and prevents other settlements from being expanded.</li>   <li>• Housing; consideration needs to be given to the need for</li> </ul>

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		<p>housing reserve sites.</p> <ul style="list-style-type: none"> <li>• Housing; housing target for Buntingford should not be seen as a cap on development but the minimum target that is expected to be delivered.</li> <li>• Policy ES2; this policy could act to prevent development of otherwise sustainable and deliverable housing sites. Development could be located within the 12m buffer and meet the required criteria through the use of appropriate design measures.</li> <li>• Policy HD1; Object – to the use of a settlement boundary if it would preclude the delivery of sustainable development proposals. The policy provides no flexibility.</li> <li>• Policy HD1; policy does not identify what type of development would be considered acceptable outside the revised settlement boundary.</li> <li>• Policy HD1 suggested alternative wording;</li> </ul> <p><i>‘When considering development proposals, the Buntingford Community Area Neighbourhood Plan will take a positive approach to new development that reflects the presumption in</i></p>

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		<p><i>favour of sustainable development contained in the National Planning Policy Framework.</i></p> <p><i>Development that is adjacent to existing settlements in the Buntingford Community Area Neighbourhood Plan should be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development’.</i></p> <ul style="list-style-type: none"> <li>• Rural economy; an increase in rural housing availability will support rural economic growth.</li> <li>• Policy INFRA1; it should be noted that developers are only required to mitigate the adverse impacts of their development, and the need for financial contributions must be justified.</li> <li>• Policy INFRA6; developers are only required to mitigate the impact of their development and not solve existing problems.</li> <li>• Policy INFRA7 ; Object; neighbourhood plans should not apply any additional technical standards relating to the construction of new homes.</li> <li>• Policy T1; policy is not in conformity with existing Local Plan as parking standards are higher than the current parking standards sought.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Policy T2; there is no requirement in national policy or guidance that would require the measures contained in the Secured by Design scheme to be performed.</li> </ul>
	HCC Property	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• Policy INFRA3 suggested alternative wording to supporting text: <i>‘Within the three-tier school system which covers the BCA, there are sufficient school places to meet current demand. However, there is increasing pressure on the demand for school places and this will become critically important to deal with as population within the BCA, particularly in Buntingford, increases.’</i></li> </ul>
Michael Stubbs	Historic England	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• Vision Statement; to include reference to ‘heritage assets’ .</li> <li>• Vision Statement suggested alternative wording: <i>‘Maintain a sense of place and local character in a high quality environment, protecting their cultural and historical heritage assets including their settings and ensuring that access, outlooks and breathing space are preserved’.</i></li> </ul>

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		<ul style="list-style-type: none"> <li>• Historic Environment; there should be a specific reference to the historic environment and heritage assets within the neighbourhood plan policies.</li> <li>• Environment and Sustainability Objectives; include an objective linked to historic environment/ heritage assets (both designated and non-designated).</li> <li>• Community Infrastructure Levy; it may be appropriate for the Plan to set out priorities for spending any CIL receipts and it is hoped that this would include enhancements as they relate to matters of public realm within the 4 conservation areas.</li> </ul>
Seb Baker	Individual	<p>Comments as follows;</p> <ul style="list-style-type: none"> <li>• Policy BE1; the expression ‘will not be supported’ cannot be used by a decision maker to refuse or limit an application in any way. The policy should state that such developments will be refused, with any exceptions stated.</li> <li>• Policies BE2 &amp; BE5; the policy should not give blanket approval for the expansion of employment sites. Restrictions similar to those applicable to other new developments should be applied.</li> <li>• Policy BE5; supporting text presents an open door to any</li> </ul>



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		<p>industrial development in the Plan area, with policies BE1-BE3 not providing any constraint.</p> <ul style="list-style-type: none"> <li>• Policy BE4; the policy should include some size or area limits in terms of location.</li> <li>• Policy BE6; may be contrary to the new permitted development rights for change of use.</li> <li>• Policy ES3; Object – wind turbines should not be supported in locations that would result in significant adverse landscape or ecological impact. Solar farms should be resisted on areas of high quality agricultural land. Any assessment must show that there will be no adverse impacts of development.</li> <li>• Policy HD1; should include a reference to the clear visual separation between settlements.</li> <li>• Policy INFRA3; should not give unconstrained support for any school proposal in any location. Restrictions similar to those applicable to other new development should be applied.</li> <li>• Policy LR2; should include caveats on location and building height should be constrained.</li> </ul>

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Mick Cocker	Individual	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• General; support expressed for the Neighbourhood Plan.</li> </ul>
Pat Herz	Individual	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• General; support expressed for the Neighbourhood Plan.</li> </ul>
Jane Mean	Individual	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• Housing; need cheaper housing for local people, particularly for the young and the old.</li> </ul>
Tim White	Individual	<p>Comments as follow:</p> <ul style="list-style-type: none"> <li>• Infrastructure; the proposed relocation of the library would not support the policies in the Neighbourhood Plan as it will reduce linked trips to retail premises in the town.</li> </ul>
	Vincent & Gorbing on behalf of Fairview New Homes	<p>Comments as follows:</p> <ul style="list-style-type: none"> <li>• General; support the emerging Neighbourhood Plan as an essential vehicle for properly managing the future of Buntingford and the surrounding villages.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Policy BE1; policy must be subject to some flexibility. Suggest that the policy wording is amended to add :  <i>‘unless it can be demonstrated by evidence of continuous marketing over a period of two years that the premises or land are not viable for employment purposes and there is no reasonable prospect of employment use’.</i></li> <li>• Policy HD7; policy should be worded to indicate that new housing development should provide a mix of unit sizes. Sceptical that encouraging new bungalows will be effective.</li> <li>• Policy INFRA3; concern that the supporting text to the policy appears to consider that a wide array of infrastructure might be accommodated on the site south of Buntingford, at the same time as requiring employment land in general to be protected and retained. The site cannot deliver on all of these competing land use requirements.</li> <li>• Policy INFRA3; Object – to the suggestion in the supporting text that part of the employment land be used for a new first school. The site is not considered available for this use.</li> </ul>