

Hunsdon Area Neighbourhood Plan Consultation: February - March 2021

General Comments:

The Hunsdon Area Neighbourhood Plan (NP) presents a planning document that seeks to shape development and is responding to the development plan in a pragmatic and positive way. Further work is still necessary to review the draft to ensure the NP is compliant with the National Planning Policy Framework (NPPF) and the other Basic Conditions, particularly in the following areas:

- Clarity is needed around terminology used within policies to provide the decision-maker with a clearer framework with which to operate.
- Some policies require further information and evidence in order to meet the Basic Conditions.
- The housing strategy needs to be justified with necessary and proportionate evidence to demonstrate that the strategic policies have been met.

Once work has been undertaken to review the document following receipt of comments through this consultation, East Herts officer's welcome the opportunity to talk to the Neighbourhood Plan Group and work through any issues or modifications subsequently prepared particularly in relation to the comments below.

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General Comments		
		Whilst reviewing all policies in light of any responses received during this consultation, paragraph 16 of the NPPF needs to be considered and in particular parts b) and d). Clear and unambiguous policies assist the decision maker when trying to react to determining development proposals.
Introduction		
2.1 to 2.26	10-18	This section provides a detailed overview of the parish including the demographic, employment trends and photographs of historic buildings within the parish. Whilst it is important to set the context of the neighbourhood plan area, this section should be explored to see if there are areas that could be condensed to provide only the salient points.
Policies Map		
Figure 13: Policies Map	24	It is important to ensure that all of the designations can be read on the map. For example, Local Green Space 4 cannot be seen on the map, only on the insert. Likewise, the housing allocation HHD2 outlined by a grey hatched designation blends in easily with the background of the map, making it not barely visible to the viewer. Consideration should be given to ensuring that all aspects of the map are visible
Figure 14: Village Inset	25	Much like the previous comment, there are a couple of designations that are difficult to see clearly on the map – particularly the Local Green Space text and the Non-designated Heritage Assets.
Neighbourhood Plan Policies		
Housing Development	26	The first sentence refers to the ‘southern part of the designated area’ which presumably relates to part of the designated neighbourhood plan area. Consideration could be given to

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para 6.1		changing the wording from 'The southern part of the designated Area' to 'The southern part of the Neighbourhood Plan Area' just to be clear to the reader that this sentence is not referring to a housing designation or allocation.
Paragraphs 6.2 – 6.5	26	<p>These paragraphs refer to the Green Belt and its continued protection. Much reference is made to the removal of Green Belt through the East Herts District Plan for the Gilston Area strategic site allocation. The coverage of Green Belt within the Hunsdon neighbourhood area however, has not been affected by the District Plan and as such it is questioned how useful and accurate this section is to the reader.</p> <p>Paragraphs 6.3 and 6.4 are largely a repeat of information within the Introduction and again are useful wider-context of the local and neighbouring area, but not the Hunsdon neighbourhood area.</p> <p>The last sentence of paragraph 6.4 alludes to the strategic context of the preparation of the neighbourhood plan and its housing policies being the Gilston Area. This is incorrect, the key strategic policy is Policy VILL1 – housing policies, alongside other policies within this Plan will not apply to applications outside of the neighbourhood area which includes applications for the Gilston Area.</p>
Policy HHD1	27	Whilst it is clear that the community place great importance on the green belt, this Policy does not add anything more than Policy GBR1 of the District Plan or the NPPF with regards to the Green Belt.
Policy HHD2	28	This Policy, and indeed the holistic housing strategy, forms the key strategic policy that the

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		<p>Hunsdon Neighbourhood Plan will need to satisfy. The supporting text rightly and factually describes the context but fails to provide the necessary detail to demonstrate that the requirements of Policy VILL1 of the EH District Plan have been met.</p> <p>This section would benefit from providing a detailed account of exactly how and where the requirements have been met. Currently, it is hard to comment on whether the strategic priorities have been met as there is no information provided to demonstrate how the minimum 37 dwellings have been provided.</p> <p>It is recommended that this section is re-written to provide a detailed breakdown of the individual permissions (and completions) that have been counted in this total and why this meets the District Plan requirements. The level of detail needed may be more suitably provided in a short supporting document or in appendices to the Plan that can then be cross-referenced in the text. Likewise, it will be a useful opportunity to demonstrate and justify why sites that are located outside of Hunsdon village are still being counted in the figures. The fact that officers have not necessarily raised any objections to certain sites being included previously, does not mean that the position doesn't still have to be justified in the Plan when it goes to examination.</p> <p>Policy HHD2 itself makes reference to the 12 dwellings that have been granted permission at Acorn Street but simultaneously allocates it as well. Thought should be given to elaborating on this site and the details in order to justify its allocation.</p>

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Policy HHD3	28	<p>This Policy as currently written provides a policy as restrictive, if not more so than national green belt policy. The justification for this restrictive and focussed policy is based upon a small amount of supporting text which notes its distinctiveness and value to the community. This policy will be scrutinised by an examiner and currently the level of evidence provided does not justify the restrictive nature of this policy. Further information should be included for evidence and justification.</p> <p>It is also worth mentioning that there is a potential conflict between this Policy and Policy HHD2. For example, this policy makes it clear that Hunsdonbury and Hunsdon are separate and makes a clear distinction between the ‘main settlement’ and the hamlet. Given that Policy HHD2 seemingly relies upon the site in Hunsdonbury assisting with its housing requirement there is a risk that this Policy undermines that argument.</p>
POLICY HHD4	30	The name of this policy could be amended to ‘Infill Development’ for clarity. In addition, reference could also be made for the policy to be in accordance with Policy VILL1 of the District Plan.
POLICY HHD6	31	This policy is in conflict with eligibility criteria for affordable housing which is set by the District Council and the District housing register. Consider deleting.
6.20	31	Reference is made to Chapter 16 and Policy DES1 in the District Plan. Chapter 16 refers to Retail and Town Centres and Policy DES1 covers Masterplanning – it’s assumed that these are likely typos and instead should reference Chapter 17 (Design and Landscape) and Policy DES4 (Design of Development)?

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6.25	33	Similar to the point above; reference to Policies DES1 and DES3 should be checked as to whether that is the correct policy cross-reference.
Policy HHD7	34	<p>Criterion c) could be better served in Heritage and Conservation policy.</p> <p>Criterion e) is any justification provided to supplement this restrictive criterion?</p> <p>Criterion f) should provide justification for this approach. This approach should also be cross-referenced with the approach and objectives in Hertfordshire County Councils Local Transport Plan 4: https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/transport-planning/local-transport-plan.aspx</p> <p>Criterion g) relates to the material of driveways to reduce runoff. Most of this type of development would be completed under permitted development so may be difficult to control.</p> <p>Criterion i) inclusion of the term 'in the neighbourhood Plan Area' is unnecessary as all policies will apply only to this area unless stated otherwise.</p>
Policy HE1	37	<p>Criterion I. is it reasonable to expect that all development proposals <i>must</i> conserve and enhance biodiversity. Consider the addition of the term 'should seek to' after 'Development proposals...'</p> <p>Criterion II. should be reworded as it currently doesn't feature any relevance to</p>

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		<p>development or land use. The criterion should refer to the expectations of development proposals that would impact on the aforementioned sites in Table 2. It is recommended that reference to management is removed as that isn't a land use policy – criterion should also be read alongside District Plan Policy NE1 to determine whether the draft criterion adds anything further.</p> <p>Criterion III. this criterion feels like it should be 2 separate policies – 1. That refers to the 3 categories in the HERC mapping and what the implications are for development; 2. Reference to biodiversity offsetting. Consider splitting into two separate criterion and also adding further details in the supporting text around the location of the HERC mapping and in particular the areas referenced – ideally supplemented with a map that could be in the appendices.</p>
Figures 18 – 21	39-41	It may be beneficial to include the designation no. e.g. <i>Figure 18: LGS 1 – The Dell</i> just to make it clear that the figures relate to the designations within the Policy.
Policy HE3	42	Criterion II should be amended so that it relates to 'Any development within the identified views' rather than any development proposals within the neighbourhood plan area, as this may not be necessary and would depend on the location of the proposal within the area.
Policy HE4	47	This policy refers to 4 hedges that 'will be protected from development'. It is not all that clear what is meant by this phrase and the policy would benefit from clearer wording to assist the decision-maker.
Policy HE5	48	Criterion I. doesn't appear to relate to the use of land, but instead the management of the

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		<p>park. Consider deleting.</p> <p>Criterion II. uses the phrase ‘changing its use for commuting’, further detail or expansion of this point would be welcomed in order to demonstrate the justification behind its inclusion and also exactly what ‘changing its use’ would entail.</p> <p>Criterion III. is a SSSI catchment area externally defined? If so a link to, or reference of the details in the supporting text would be useful. Consideration should also be given as to what would be required during a site assessment for this purpose.</p>
Policy HHC1	58	<p>Criterion II. is vaguely worded and appears to add little beyond District Plan Policy HA7. The latter part of the criterion refers to the painting of buildings being inappropriate, this needs to be reworded as it is unlikely that painting a building would constitute development or require planning permission (outside of a conservation area or non-listed buildings) – if this point refers directly to listed buildings then it should make this clear, however ‘different colours’ is not clear and it also is not clear what the action of the decision-maker should be if a colour is determined ‘entirely inappropriate’.</p> <p>Criterion III. is written in a way that makes it sound like a more general, design-based policy criterion rather than a heritage and conservation one that refers to a specific area. The latter sentence refers to a specific area but not in detail, consider revising for further locational clarity and a more focussed criterion on that subject.</p>
Policy HT1	64	<p>Criterion I – should be clearer that it is referring to a TIA being submitted alongside a</p>

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		<p>planning application road proposals and infrastructure proposals would obviously need to provide a TIA or similar and so the necessity of their inclusion is questioned. Consider the following wording instead <i>'Where appropriate, major or new development proposals should be accompanied by a...'</i>.</p> <p>Criterion II. 'negative impacts' needs to be clearly defined as it could be widely-misinterpreted. This whole criterion could benefit from being revised as it is unclear and vague about both what its purpose is, and how a decision-maker would use it.</p> <p>Reference to, or use should be made of Hertfordshire's Local Transport Plan 4 both in influencing this policy and HT2: https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/transport-planning/local-transport-plan.aspx</p>
Policy HT2	65	<p>Criterion I. sets out that the 'promotion of safe and sustainable modes of transport' will be 'pursued through any discussion on development proposals' – it's unclear what is actually wanted from development proposals. Policies should be used to set out the expectations of development not to start a discussion without any framework which this seems to allude to.</p> <p>The criterion further refers to this policy applying to developments in the 'Parish and with developments on the Parish boundary', as set out in legislation policies in neighbourhood development plans only apply in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan. Therefore policies cannot relate to developments outside the Plan Area and so references to 'Parish' and</p>

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		<p>'parish boundary' should be deleted.</p> <p>The criterion further refers to 'new and enhanced networks' which are not defined in the policy or made clear enough in the supporting text. Further to this, consideration needs to be given to the effectiveness and desirability of limiting travel to 'commuters, residents of all ages and abilities...' - there would be no way to manage who uses new travel routes. This policy would benefit from significant re-working.</p>
Policy HB1	67	<p>Criterion c) – it may be more appropriate to say 'no significant increase in heavy good traffic' In addition, the Policy should be in accordance with Policy ED2 Rural Economy of the District Plan which states 'proposals that create new employment generating uses or support the sustainable growth and expansion of existing businesses in the rural area will be supported in principle where they are appropriately and sustainably located and do not conflict with other policies within this Plan.'</p> <p>On a side note – criterion numbering/lettering has been interchangeable throughout the document – in some policies Roman numerals are used but in others letters are, consistency would be beneficial.</p>
Policy HWB1	70	<p>It's possible that this policy weakens the protection of recreational space, or at least provides a lower test than that set out in in Policy CFLR1 of the District Plan (part VI). Consideration should be made as to whether there is a conflict with CFLR1 and which is more suitable to the community – consideration should also be given as to whether it is</p>

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		necessary for this policy given the District Plan policy and the aim to avoid duplication.
HWB2	70	Part a) of this policy appears to sound like a site allocation for facilities but does not have the justification for such a specific allocation in the supporting text.
HWB3	71	<p>The supporting text to this Policy makes it clear that the sole health facility is situated in the Village Hall.</p> <p>It is suspected that the part-time use of the Village Hall is not subject to any planning... It may be of more benefit to instead offer up greater protection of the village hall.</p> <p>Likewise, part b) refers to 'any development proposals which would have a negative impact on health provision in the parish, should show how that impact could be addressed.' Again, in practice the village hall is the facility that is being referred to here and as such this should probably be the focus.</p> <p>A further criterion could be added to support any development for the health facilities in the Neighbourhood Area.</p>