

Summary of Responses to the Standon Neighbourhood Development Plan (Regulation 16 Consultation)

Summary Document of Representations:

This Document provides a summary of representations received during the Regulation 16 consultation on the Standon Neighbourhood Development Plan. This summary does not contain an exhaustive list of every representation and detail received. All comments received during the consultation were sent to the Independent Examiner in their entirety.

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CALA Homes	<p>In general, CALA Homes support the principles for development set out within the Plan and believe the plan to be considered in general alignment with the emerging policies of the East Herts District Plan. We do however have comments on the following:</p> <ol style="list-style-type: none"><li data-bbox="409 831 1792 866">1. Extent of allocated land identified for development at site SLAA 35/004 – Land at Café Field <p>The site is proposed to be allocated for residential development purposes for the construction of 93 homes under reference SLAA 35/004. An outline planning application for up to 93 units has been submitted to East Herts Council under reference 3/17/1055/OUT and has received a resolution to grant planning permission subject to the completion of the S106 Planning Agreement.</p> <p>The Eastern boundary of the site allocated for development as shown in the Submission Draft of the NP does not align with the red line boundary that forms part of the outline planning application. This discrepancy should be amended so that the allocation within the Plan aligns with that of the outline planning permission.</p> <ol style="list-style-type: none"><li data-bbox="409 1315 978 1350">2. Policy SP19 – Car Parking Standards <p>The exclusion of garages being classed as usable parking spaces when assessed as part of the overall parking provision for each unit should be reconsidered. Whilst the concerns outlined within the Plan regarding garages</p>

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	<p>not being used for the parking of vehicles are noted, garages are an effective way of providing car parking. Garages whether these are attached to the side of a house or integral to the house provide a valuable means of parking that reduces the need for excessive levels of hardstanding to the front of the dwelling this subsequently has an adverse design impact on the street scene and appearance of the wider development.</p> <p>In addition, the requirement for one visitor space for every three units within a development is also considered excessive. For a site such as that at Café Field which is allocated for the development of 93 units, this would result in a requirement of 31 visitor spaces which would significantly impact upon the design and appearance of the development. Given East Herts Council discourages the use of parking courts for the provision of car parking, and the Neighbourhood Plan is also suggesting garages should not be included as part of the on site parking provision for units, this will have a significant design impact on the layout in terms of the layout of car parking within developments and conflicts with the general design guidance set by East Herts Council.</p>
Gladman Developments Ltd	<p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the SNP must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p> <p><i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></p> <p><i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i></p> <p>National Planning Policy Framework and Planning Practice Guidance</p> <p>The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.</p>

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	<p>At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.</p> <p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development. Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.</p> <p>Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p>Planning Practice Guidance</p> <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance</p>

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	<p>(PPG).</p> <p>On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p>On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the SNP's ability to meet basic condition (a), and (e) and this will be discussed in greater detail throughout this response.</p> <p>Relationship to Local Plan</p> <p>At the time of writing, the current development plan that covers the Standon Neighbourhood Plan area and the development plan which the SNP will be tested against is the East Herts Local Plan Second Review, adopted in 2007 with policies saved in April 2010.</p> <p>The Council has been progressing with a new District Plan which was submitted for independent examination in March 2017. During the course of this regulation 16 consultation the main modifications deemed necessary to make the emerging District Sound have been released and are currently the subject of a 6-week consultation. At this advanced stage the SNP should be mindful of any changes made to the policies contained with the emerging District Plan with sufficient flexibility in the policies of the SNP to avoid conflict and subsequently policies being superseded under Section 38(5) of the Planning and Compulsory Purchase Act 2004.</p> <p>One of the key modifications to the plan will be the increase in housing requirement during the plan period. It is not clear what this will mean for the neighbourhood area however this is new evidence of housing need that should be taken into account by the SNP and as such Gladman suggest flexibility is incorporated in to the plans policies. Gladman have suggested a series of modifications to the plan below that will ensure the basic conditions</p>

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	<p>can be met.</p> <p>Standon Neighbourhood Plan</p> <p>This section of the representations will deal with Gladman’s concerns with regards to the SNP’s ability to meet the basic conditions. Gladman responded to the Regulation 14 consultation held by the Parish Council and are concerned having read the supporting consultation statement that it is not clear how our consultation response has been considered in helping shape the submission version of the SNP, if at all. Unless it can be demonstrated how the representations received to the regulation 14 consultation have helped shape the formation of the neighbourhood plan Gladman question the effectiveness of the consultation.</p> <p>Policy SP1 - Sustainable Development</p> <p>Gladman support the inclusion of this policy in setting out that sustainable development proposals will be supported.</p> <p>Policy SP3 - Views and Vistas</p> <p>This policy is overly restrictive with insufficient evidence to support protection of the extensive views indicated on the policies map. Evidence should at least set out why each view is considered important, it is not enough to simply be a view across a nice field, it must exhibit some demonstrable physical attributes which elevate its importance above simply being an area of undeveloped countryside. The extent of these views and vistas is likely to restrict otherwise sustainable development form coming forward without flexibility being drafted in to the policy.</p> <p>Further, Gladman submit that new development can often be located on the edge of settlements without impacting on key vistas and views. Quite often the delivery of sustainable development proposals can enhance an existing landscape setting and provide new vistas and views to the surrounding area.</p> <p>Policy SP4 - Heritage Assets</p> <p>This policy does not accord with the Framework regarding non-designated heritage assets, seeking to offer further protection for non-designated heritage assets than set out in the Framework. To be in greater accordance with the Framework, specifically paragraphs 133 – 135, Gladman suggest this policy is amended to reflect that the significance of a non-designated heritage asset will be a consideration in any planning decision.</p> <p>Policy SP6 - Biodiversity</p> <p>Gladman submit that new development often offers the opportunity, where necessary, to improve biodiversity</p>

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	<p>assets of existing ecological values and can often be integrated into development proposals with appropriate design measures, helping to maintain their role as part of both the local and district biodiversity network. However, Gladman consider this policy to be overly restrictive and submit that this policy should note that in some circumstances, this policy should allow for the loss of some of these assets i.e. trees/hedgerows which may be required as part of a development proposal (e.g. for access). These limited losses will often be replaced by improvements to the useable public open space which will add further to the biodiversity assets found on site.</p> <p>Policy SP7, SP8 and SP9</p> <p>These policies set out the circumstances that development will be considered in the neighbourhood area. Following our comments above about the needs for flexibility following the publication of the main modifications to the emerging District Plan, Gladman are concerned that there is a presumption against residential development beyond the settlement boundary. This is not in accordance with the Framework and to meet the basic conditions will require modification to ensure to a more flexible approach. Gladman suggest that the consideration of demonstrably sustainable schemes adjacent to the settlement boundaries would provide this flexibility.</p> <p>Policy SP11 - Affordable Housing</p> <p>As no allocations included within the plan would meet the minimum threshold for affordable housing delivery and a current lack of flexibility to allow further development at this scale to come forward Gladman question the necessity of this policy and suggest it is removed to be dealt with through the Local Plan.</p> <p>Policy SP13 - Housing Density</p> <p>Gladman are opposed to this approach which seeks to restrict the density of new housing developments. This does not accord with paragraph 58 of the Framework which seeks to optimize the potential of a site to accommodate development. Seeking to restrict densities in this way does not meet basic condition (a).</p> <p>Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the SNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.</p>

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	<p>Gladman is concerned that the plan in its current form does not comply with basic condition (a) the Plan does not conform with national policy and guidance. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team. Gladman request to participate at the hearing session(s) should the Examiner decide it necessary to discuss these issues in a public forum.</p>
<p>Hertfordshire County Council Environment Department</p>	<p>Transport</p> <p>General Evidence presented in demonstrates an understanding of the highway network within the Standon Parish. The suggested transport objectives if achieved would provide the correct balance of transport infrastructure to support the anticipated growth within the Parish.</p> <p>Vision and Objectives</p> <p>Transport The aspirations that local transport links should provide the community of Standon better access to employment and leisure opportunities is supported, though access to education should also be included.</p> <p>Ensuring a safer highway network for both road users and pedestrians would be a key consideration and the County Council is pleased to see this is reflected within the objectives.</p> <p>An evidenced based approach should be used to demonstrate how pedestrian’s movements are prioritised within Standon Parish and all new paths should be constructed in accordance with the County Council’s Roads in Hertfordshire: A Design Guide.</p> <p>The proposals for developments to be located in such a way as to reduce current and future congestion, car parking and improve road safety are supported.</p>

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	<p>The County Council's own consultation concerning the potential bypass option concluded that no overall route choice was agreed. Therefore the objective to protect the "bands of interest" would need further consideration and evidence to be fully endorsed.</p> <p><i>Transport</i></p> <p><i>Highways and Road Traffic</i></p> <p>Paragraph 5.56 comments on proposals by the County Council for the introduction of on-line measures through Standon to the A10 to address the changing traffic flows arising from the construction of the Little Hadham bypass. Currently, results from a public consultation concerning the suggested measures have been finalised and are being incorporated into draft scheme plans which are due to be presented for wider public consultation in the coming months. The County Council will make scheme drawings available to the Advisory Committee as soon as they are available.</p> <p><i>Policy SP18 – Cambridge Road Access</i></p> <p>The County Council supports comments concerning the potential for improvements to the Cambridge Road Junction. The emerging work around on-line improvements through Standon to the A10, do include new crossing, improved road lay-out and junction improvements at Cambridge Road.</p> <p><i>Vehicle Parking</i></p> <p>Parking standards should strike a balance between delivering sustainable development which encourages the use of alternative forms of transport to the car, while recognising that Standon sets within a rural district with a dispersed settlement pattern and a high level of car ownership. The County Council would reference East Herts Council District Planning Executive Panel (19th March 2015) which includes comments concerning the proposed car parking standards in East Herts emerging Local Plan, these include:</p> <ul style="list-style-type: none">• Car parking standards are no longer referred to as being 'maximum' standards, which will enable provision to reflect local circumstances on a site specific basis.

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	<ul style="list-style-type: none"><li data-bbox="459 240 2098 320">• Car parking standards for residential dwellings with 1, 2 or 3 bedrooms (Use Class C3) have been amended to allow for a small increase in parking provision in comparison to current adopted standards. <p data-bbox="409 371 676 405">Public Transport</p> <p data-bbox="409 416 2074 539">The County Council would advocate working in partnership with bus companies as a key way to address the concerns over lack of rural services as suggested by the Plan. Commercial bus operators will provide better and more frequent services if there is potential for the number of users to increase.</p> <p data-bbox="409 592 2098 715">The County Council would support the adoption of “smarter choice” interventions, with the availability of residential travel packs (individual public transport information available per new dwelling) as a key consideration when interventions are being considered.</p> <p data-bbox="409 767 714 801">Cycling and Walking</p> <p data-bbox="409 812 2098 935">The suggestion that new housing developments proposed within the Plan should be linked by cycling and walking routes to key services such as shops, schools and leisure facilities with Standon and Puckeridge is supported. Improvements to cycling routes between former A10 to Colliers End should also be considered.</p> <p data-bbox="409 987 658 1021">The A120 Bypass</p> <p data-bbox="409 1032 2098 1155">The County Council will work closely with both the Parish Council and the Advisory Committee when developing any on-line interventions for Standon. As detailed above, further consultation and draft plans are currently being developed and wider public engagement will be undertaken.</p> <p data-bbox="409 1208 719 1241">Public Rights of Way</p> <p data-bbox="409 1252 2033 1332">The County Council will work with both the Parish and District Council to fully support, promote and maintain local rights of way within the Parish.</p> <p data-bbox="409 1385 573 1418">Air Quality</p> <p data-bbox="409 1430 2063 1457">Policies that would require developers to submit information concerning the effect on air quality are supported</p>

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	<p>and would want to review mitigation measures which would involve impacts on the highway network.</p> <p>Landscape</p> <p><i>Environment and Landscape</i> The reference to the current Landscape Character Assessment and relevant landscape character areas is supported.</p> <p><i>Conservation and Heritage</i> The reference to important local green spaces is supported.</p> <p><i>Green Infrastructure</i> The reference to the suite of Hertfordshire Green Infrastructure strategies is supported.</p> <p>Planning Practice Guidance states that '<i>Local Plans should identify the strategic location of existing and proposed green infrastructure networks.</i>' In line with this, there is an opportunity to go further and produce a plan of the key strategic assets throughout the Plan area and identify opportunities where they need to be enhanced including in relation to forthcoming site allocations.</p> <p><i>Biodiversity</i> The reference to important hedgerows is supported. There is also an opportunity to consider any important trees and other landscape features. A Green Infrastructure Plan (as described above) provides an opportunity to show where there is an opportunity to enhance networks of hedgerows, trees and features that could for example be delivered through future developments.</p> <p><i>Design of Development</i> The reference to sustainable design is supported. It would be beneficial to establish a requirement for high</p>

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	<p>quality landscape strategies to accompany development proposals where relevant, that take a landscape led approach to site layout and design, and the delivery of sustainable drainage systems.</p> <p>Historic Environment</p> <p>The statement (Conservation and Heritage 5.18) that ‘it is clear that the public places a great deal of value on the historic environment and built heritage of the Parish’ is welcomed.</p> <p>The Environment Report SNP4 that accompanies the Plan describes many of the heritage assets in the parish, including mention of both above and below ground heritage assets, such as the Scheduled remains of the Roman town at Braughing/Puckeridge (Scheduled Monument Ref 1005249).</p> <p>Section 5.22 NDP states that ‘the Parish Council supports the aims of the East Herts Submission District Plan, which seeks (Policy HA1) to protect the heritage assets of the District.’</p> <p>Section 5.22 also states that the District Plan also contains a pledge (Policy HA2) by the District Council to engage with local communities on the protection of non-designated heritage assets and that ‘Consequently the Neighbourhood Plan has identified certain non-designated heritage assets in the Parish - a schedule of these assets is contained in the Environment Report SNP4.’ This schedule includes visible historic features such as fords, and locally important buildings, but no sites containing known buried archaeological remains (heritage assets of archaeological interest) are put forward, even though the parish contains numerous significant archaeological sites of prehistoric, Roman, and later date.</p> <p>The Plan also does not include any mention of the potential presence of unknown buried heritage assets of archaeological interest. Since there is considerable potential for finding currently unknown below-ground archaeological remains throughout the parish, due account should be taken of this potential in considering development proposals. The Plan should therefore include clearer provision for protecting the historic environment within Policy SP4 Heritage Assets. The limitations that this may put on development should be also</p>

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	<p>recognised, as per the National Planning Policy Framework paras 126-141 and the policies contained in the Submission East Herts District Plan (due to be adopted in 2018).</p> <p>Policy SP4 should be revised and include a policy that recognises that due account should be taken of the importance of archaeological assets in the development process.</p> <p>With regard to the SLAA assessed sites, the majority require no specific comment with regard to the historic environment. However, it should be noted that four sites are wholly or partly within the Scheduled area of the Roman town at (SM 1005249). These are:</p> <p>35/016 Land at Wickham Hill – rated as achievable for up to 30 dwellings subject to a review of the village boundary.</p> <p>35/036 Land east of Buntingford Road (Site J) – SPNDP will accept this site to be put forward for Class B1 light business/industrial use with a change in village boundary subject to scheduled monument investigation.</p> <p>White Hart back land owned by McMullens (Site L, no SLAA) - SPNDP will accept this site to be put forward for Class B1 light business/industrial use with a change in village boundary subject to scheduled monument investigation.</p> <p>Kings Yard (Site M, no SLAA) – SPNDP will accept this site to be put forward for Class B1 light business/industrial use with a change in village boundary subject to scheduled monument investigation. The site however has Prior Approval Req/Grant with Conditions for change of use of the existing office building to a single residential dwelling.</p> <p>Scheduled Monuments are protected under the Ancient Monuments and Archaeological Areas Act (1979), and therefore no development, whether residential or light business/industrial use, could take place in these areas without the granting Scheduled Monument Consent. Development in close proximity to a Scheduled Monument</p>

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	that may adversely affect its setting is also a material consideration in the planning system.
Hertfordshire Ecology	<p>I fully support the objectives for the environment as outlined in Section 4.3, in particular:</p> <ul style="list-style-type: none"> • To offer greater protection to the retention of features important to the visual appearance and character of the Parish, including its built heritage, Conservation Areas, Listed Buildings, cherished views, green spaces, woodlands, natural habitats, and watercourses • To protect and manage land that is important for biodiversity and nature conservation • To protect and manage natural ground water sources and their habitats in order to maintain supporting ecosystems, to prevent water and soil pollution, and to sustain the role of water courses in flood prevention <p>However, my concern is that whilst <u>protection</u> of land may be achieved through the planning process, <u>management</u> of land is rarely - if ever is influenced by planning unless certain activities require planning permission. Most of this will be agricultural (largely arable) or woodland, or leisure (horses) where land management is not affected by planning unless there is a change of use. Whilst the objectives are laudable, the means to deliver them are wholly absent. Unless this is addressed, I cannot see how it is legitimate to include this aspect, however desirable.</p> <p>Better wording may be: 'To protect and where appropriate, seek to support appropriate management of...' as some planning issues may enable this, such as funding to support management if appropriate through a S106 agreement.</p>
Hertfordshire Ecology	<p>5.28 Supporting Statement. I do not recognise the statement that '<i>The Hedgerows Regulations 1997 state that "important" hedgerows cannot be removed during development</i>'. If an application for removal is made, the LPA is expected to issue a retention notice unless there are overriding reasons as to why it should be removed. This would mean the protection continues beyond the development. However, if – after development - the hedgerow is regarded as a garden hedgerow, the Regulations do not apply. Without any application, the hedgerow would be considered protected unless demonstrated otherwise.</p> <p>Consequently it would be more accurate to state: 'The Hedgerow Regulations aim to protect important hedgerows in the countryside by controlling their removal</p>

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	<p>through a system of notification, where there is a presumption in favour of protecting and retaining important hedgerows'. As stated in the Regulations.</p>
<p>Hertfordshire Ecology</p>	<p>I can't see any 'list' of designated wildlife sites in SNP4 as stated within SP6. Given Plashes Wood is highlighted, this must refer to non-statutory Wildlife Sites and there does not seem to be a list of these within the Parish. Whilst I support the protection of non-designated sites, applying the NPPF guidance must take into account the relative importance of sites which considers their relative status. This hierarchy is expressed in para 113 of NPPF. Consequently in practice, not all sites referred to in this policy would receive similar levels of protection. The policy should state: 'Protection will also be afforded to other non-designated sites of nature conservation interest commensurate with their status and giving appropriate weight to their importance and contribution they make to wider ecological networks.'</p> <p>I consider [<i>as identified by the Hertfordshire Environmental Records Centre</i>] should be removed as may not have been identified by HERC.</p> <p>If the Policy refers to important hedgerows in the context of the Hedgerow Regulations, there is insufficient evidence within SNP6 Trees and Woodlands Report to justify the hedgerows listed in the Policy as Important. There should have been a formal assessment against the Regulations criteria if this is the case and there is no evidence that this has been undertaken. H11 would be regarded as a garden hedgerow being the boundary of the properties in Aston Rd, and also H3 and part of H8 adjacent to Cambridge Court. These are not covered by the Regulations.</p> <p>Furthermore, I am not clear as to why only certain important hedgerows should be highlighted anyway if all relevant hedgerows are given protection by default under the Regulations, or at least until a removal notice is considered by the LPA. Surely all appropriate hedgerows covered by the regulations have an important role for many reasons and should be protected.</p> <p>Obviously I support the protection and enhancement of all hedgerows whether or not they are important under the Regulations and the policy could be amended to reflect this principle, such as: 'All hedgerows – including those protected under the Hedgerow Regulations - should be retained and enhanced</p>

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	<p>where possible to ensure their landscape, biodiversity and ecosystem service roles are maintained within the Parish’.</p> <p>It also may not be reasonable to require retention of all the listed hedgerows given some local removal may be required to enable access to development areas.</p> <p>The Policy detail on hedgerows also seems very site specific, namely focused on south of Puckeridge. This could be addressed by a more generic statement as the principle to protect local features where possible would apply to all development sites.</p>
Hertfordshire Ecology	<p>In respect of development sites for dwellings, 11 are proposed for inclusion within the Neighbourhood Plan. All of these have permission of some kind. Two are proposed for industrial use. Site M is adjacent to a wildlife site. None of the other sites on the Final Allocations map in SN8 and Policy SP7 directly or indirectly affect a Wildlife Site.</p> <p>In respect of the remaining SLAA sites within the Neighbourhood Plan, there is a potential conflict with a Wildlife Site at the following:</p> <p>35/001 - adjacent to WS Old Butts, Barwick 46/001; 35/013 – adjacent to WS Colliers End Meadows and Ponds 32/030.</p> <p>Other SLAA sites with local features of interest include the following:</p> <p>35/005 hedgerows and possible grassland interest; 35/014 hedgerows and possible grassland interest; 35/007 scrub; 35/015 hedgerows; 35/036 dense scrub, hedgerows and possible grassland interest; 35/016 hedgerows, wooded belt and dense scrub; 35/010 trees and possible grassland interest;</p>

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	<p>35/003 hedges and possible grassland interest; 35/037 tree belt; 35/011 trees; 35/019 hedgerows and possible grassland.</p> <p>It is not clear whether any of the above would also be considered by EHDC if development needs were not otherwise considered to be met by the Neighbourhood Plan, but the potential issues have been outlined if they were.</p> <p>If necessary, reference to the likely impacts could be made within supporting text for SP7 or SP6 as appropriate.</p>
Hertfordshire Gardens Trust	<p>We commend the inclusion of Policy SP3 on Views and Vistas but are disappointed that the setting of heritage assets is not included. As setting is one of the components of significance, this is perplexing. Setting of the countryside is included but setting for heritage assets is much more well defined. I attach the latest version from Historic England of <i>Setting of Heritage Assets</i> which came out in December of 2017.</p> <p>Further we are disappointed that no historic designed landscapes are included. The parish has no nationally Registered ones but it has the very important Standon Lordship. The comment about the meadow there is insufficient. The earthworks, both the river side and the terracing near 'Queen Anne's Bath' have been extensively surveyed and a report produced by Professor Williamson of UEA. Although more work needs to be done his conclusion was that;</p> <p><i>This is an exceptionally interesting collection of earthworks. Those lying to the south of the house clearly indicate the existence of extensive early gardens. If the more enigmatic features to the north west of the house can, indeed, be shown to relate to an early designed landscape, Standon would represent one of the most important garden earthwork sites in Hertfordshire.</i></p> <p>In light of this comment, we feel that the garden remains, possibly including a 17th century water garden, consistent with the magnificence of the house, merit inclusion as a heritage asset in the Plan.</p>
Historic England	<p>In December 2016 Historic England submitted comments on the Pre-submission (Regulation 14) Draft of the Neighbourhood Plan direct to the Parish Council. I have now had the opportunity to review the latest version of the Plan and am pleased to see that our earlier comments have been reflected in this latest version. I therefore</p>

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	do not wish to comment further at this stage.
East Herts Housing Team	<p>Pg 20 - Housing and Development We have a concern around the use of the word starter homes for young people. Starter Homes in terms of affordable housing is a defined type of housing and as yet not regulated by Government. We would suggest the use of alternative wording.</p> <p>Pg 32 - Housing and Development, Housing Land Supply. Policy SP10 - Housing Mix We have a concern about the use of the word starter homes. Starter Homes in terms of affordable housing is a defined type of housing and as yet not regulated by Government. We would suggest the use of alternative wording.</p> <p>Pg - 37- Affordable Housing 5.43 - this does not include the full policy thresholds for affordable housing as set out in the Draft District Plan policy.</p> <p>5.44 - The wording here reports the results of the Neighbourhood Plan survey. It should be noted that the Draft District Plan seeks 35% affordable housing on sites of 11-14 dwellings and 40% on sites of 15 or more dwellings. The tenure split identified for Affordable Housing is 84% for rent and 16% for shared ownership in the Draft District Plan.</p> <p>Pg 38 - Policy SP12 - Rural Exception Sites We have a number of comments on this Policy: The Housing Team prefer to apply a Local Lettings Cascade on a site by site basis as Rural Exception Sites come forward. The Local Lettings Cascade would form part of the accompanying S106 of the planning permission. The rental properties would be let via the Council's Housing Needs Register with the agreed Local Lettings Cascade applied. The wording proposed does not match requirements/priorities on the Housing Needs Register and is not explicit enough about things like hours of employment. The definitions in Local Lettings Cascade need to be very</p>

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	<p>clear and in alignment with policies in place. A 16 week first letting allocation would not be acceptable to a Registered Provider. The rental units would be let via the Council's Housing Needs Register.</p> <p>We prefer to not have a blanket policy for Local Lettings as there may be legislation/regulations/guidance changes which we can reflect at the time of the build in consultation with the Parish.</p>
Pelham Structures	<p>VISION AND OBJECTIVES</p> <p>4.3 EMPLOYMENT, BUSINESS, FACILITIES AND SERVICES</p> <p>It is my belief that the plan in its current form fails to meet the aims under these sections in relation specifically to Colliers End.</p> <p>The critical mass of a settlement needed to support and encourage employment and business is now larger than historically required. If Colliers End is to continue to support a Public House and some form of shop it needs to be larger. Its geographical location is recognised by EHDC and appeal inspectors as sustainable but to enhance further its sustainability it needs to grow if existing and additional employment and other community benefits such as the Church and Village Hall are to survive. The road frontage section of site 35/013 and the road frontage section of the land opposite are both obvious areas that would provide additional housing with minimal negative impact and would enhance and protect the existing local facilities.</p> <p>Puckeridge and Standon are already of sufficient size to support a varied range of facilities. Housing at Colliers End would provide for greater benefits.</p> <p>Further, a coordinated approach to growth could also provide a Colliers End sewage treatment plant with the obvious advantages to a distant system via Standon.</p> <p>TRANSPORT</p> <p>Colliers End has a frequent bus service with connection to the major service centres. Its location on the old A10 provides excellent road links to the north and south.</p> <p><i>POLICY SP8 - Colliers End In the Group 2 settlement of Colliers End, there will be limited infill provision for housing, in accordance with Policy VILL2 of the East Herts District Plan. Development will be permitted within the defined village boundaries as shown on the Policies Map</i></p> <p>The plans accepts that Colliers End could accommodate some development as infill, but within the defined village boundaries there are practically no infill gaps, thereby, rendering this section redundant.</p>

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	<p>CONCLUSION</p> <p>The failure to expand Colliers End will inevitably result in a loss of local facilities over time and become not a proper sustainable community but a dormant village. Some planned growth is essential.</p>
<p>Strutt & Parker on behalf of Sunderland Nominees</p>	<p>1. Introduction</p> <p>1.1 These representations are submitted by Strutt & Parker on behalf of Sunderland Nominees PTY Ltd who have an interest in land known as Café Field, Standon Hill, Puckeridge.</p> <p>1.2 On behalf of our client we would like to confirm our general support for the submission draft Standon & Puckeridge Neighbourhood Plan 2017 and acknowledge all the hard work which the Parish Council, the Neighbourhood Plan Steering Group and working groups, have put into the preparation of this very comprehensive document and supporting evidence documents. This is the culmination of a significant amount of work over a number of years and the local community should be proud of this, their Neighbourhood Plan.</p> <p>2. Specific comments</p> <p>We are pleased to be able to support the Neighbourhood Plan but would like to make the following observations and comments.</p> <p>2.1 Policy SP3 – Views & Vistas</p> <p>The inclusion of Policy SP3 is generally welcomed and we support the inclusion of key public viewpoints PV1 to PV9 included within the policy.</p> <p>2.2 Policy SP5 – Local Green Spaces</p> <p>We welcome the revisions to Policy SP5 to only include local green spaces which comply with the definition set out in the NPPF at paragraph 77. We therefore support the inclusion of LGS1, LGS2 and LGS3 as Local Green Space designations.</p> <p>2.3 Policy SP6 – Biodiversity</p> <p>We note that Policy SP6 has been expanded to include all the hedgerows surrounding our client’s site, namely, H8, H9, H10 and H11. While we understand the principle behind the policy and the need to protect hedgerows for their landscape and biodiversity value, we would question the inclusion of hedgerows H10 and H11.</p> <p>We would like to express reservations in respect of the inclusion of H10 which forms the northern boundary of our client’s site. The existing hedgerow, we would suggest is of limited value and contains extensive gaps. Similarly, hedgerow 11 forms the eastern field boundary between the site and the existing dwellings in Plashes</p>

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	<p>Close, Aston Road and Hammersfield Close. This hedgerow is also fairly sparse and contains extensive gaps.</p> <p>It is noted that the commentary in the Trees and Hedgerows Report, SNP6 acknowledges that both these hedgerows have extensive gaps and are of limited biodiversity value. In particular, hedgerow 11 is made up of various domestic hedging and has been managed by homeowners on both side of the boundary. We would therefore suggest that H10 and H11 should be omitted from Policy SP6, as they are both of extremely limited biodiversity value.</p> <p>2.4 Policy SP7 – Housing Land Allocations</p> <p>We support the allocations set out in policy SP7 for residential development in the first 5 year period of the plan. In addition, we support the inclusion of site C, the eastern part of Café Field.</p> <p>It is noted that the development boundary shown on the polices map (page 60) and Standon & Puckeridge Policies Inset Map (page 61) does not align with the extent of the application site, submitted under planning application number 3/17/1055/OUT and we would recommend that this should be adjusted to accurately reflect the extent of the application site. A copy of the planning application site plan, drawing number 8547/01 is enclosed with this representation for information.</p> <p>3 On behalf of our client, we hope you find the above comments and observations helpful and we take this opportunity to wish the Parish Council every success in getting their Neighbourhood Plan made.</p>
Thames Water	<p>Policy SP24</p> <p>Thames Water support the section of the draft Neighbourhood Plan in relation to flood risk and drainage and the aims of Policy SP24. However, as a result of changes to the way that sewerage infrastructure will be delivered coming into effect from the 1st April 2018 it is considered that the wording of Policy SP24 should be amended as set out below.</p> <p><i>“In Standon, Puckeridge, and Colliers End, any proposal which would result in an increase in surface water run-off or flood risk will not be permitted. For major development proposals, developers should minimise any surface water flows to the sewerage network and consult with the water and sewerage undertakers to establish if capacity exists to serve development. Where necessary phasing conditions may be used to ensure that occupation of development is aligned with any off-site infrastructure upgrade requirements.”</i></p> <p>It should be noted that within the supporting text for the policy in Section 5.76 reference is made to Policy WAT5</p>

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	<p>of the draft District Plan. It is considered that this reference should be to Policy WAT6 of the submission District Plan.</p> <p>Delivery of infrastructure</p> <p>Thames Water would welcome ongoing engagement with developers and the council in relation to the delivery and phasing of developments within the Neighbourhood Area to assist with ensuring that any necessary infrastructure upgrades necessary are delivered ahead of the occupation of development.</p>
Woodland Trust	<p>Vision and objectives</p> <p>The Woodland Trust is pleased to see that your vision for Standon identifies the importance of its quality landscape, and how it is enriched by its open aspect to the countryside</p> <p>Trees are some of the most important features of the area for local people. This is being acknowledged with the Pre-Submission East Hertfordshire District Local Plan (2016), which identifies ancient and other woodland as quality local green infrastructure, and resists development resulting in the loss of woodland, hedgerows and trees. One of the objectives of Policy NE4 (Green Infrastructure) is to protect, manage and plan for the preservation of valued landscapes, such as trees and hedgerows and woodlands. Also, one of the indicators of the monitoring framework for the Local Plan is change in the loss being made to ancient woodlands. This general Local Plan policy should also be taken into account with the issues, vision and objectives in the Neighbourhood Plan for Standon.</p> <p>Therefore, the vision of your Neighbourhood Plan should be amended to also seek to protect and enhance the character of Standon, and include the following:</p> <p>“To protect and enhance the local environment, green and open spaces, ancient woodland, veteran trees hedgerows and trees”.</p> <p>Environment</p> <p>We are pleased to see that the Neighbourhood Plan for Standon does identify the need to conserve and enhance its landscape, and how any new development in your Parish needs to respect its distinctive landscape character, such as Plashes Wood, which is ancient woodland.</p> <p>However, your Plan for Standon should also seek to ensure development must conserve mature trees and hedgerows, so there is no loss or degradation of ancient woodland in your parish. It should also support</p>

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	<p>conserving and enhancing woodland and trees, such as Oak trees, with management, and also to plant more trees in appropriate locations. Increasing the amount of trees and woods in Standon will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.</p> <p>Information can be found here: http://www.magic.gov.uk/MagicMap.asp and http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/</p> <p>Ancient woodland would benefit from strengthened protection building on the National Planning Policy Forum (NPPF). Therefore, we would recommend that your Environment section of your Neighbourhood Plan should include something along these lines:</p> <p><i>“Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional”.</i></p> <p>The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient woodland protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017) identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland in the geographical area of your Neighbourhood Plan. Standing Advice from Natural England and the Forestry Commission has some useful information:</p> <p>https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>The profile of Standon identifies the need to retain and enhance its rural character as a small rural settlement, and also the need for development to integrate with the landscape. Given that Neighbourhood Plans are a great opportunity to think about how trees can also enhance your community and the lives of its residents, the natural environment and tree and woodland conservation in Standon, should also be taken into account with a Policy in your Plan.</p> <p>Therefore, we would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Standon. In an era of ever increasing concern about the nation’s physical and mental health, the Woodland Trust strongly believes that trees and</p>

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	<p>woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.</p> <p>Public open green spaces</p> <p>Whilst Policy SP6 (Biodiversity) in your Neighbourhood Plan does acknowledge the principal importance of protecting ancient hedgerows and deciduous woodlands, it should also seek to retain and enhance open green spaces, resist the loss of open space. Whilst also ensuring the provision of some more, to what extent there is considered to be enough accessible open space in your community also needs to be taken into account. There are Natural England and Forestry Commission standards which can be used with developers on this:</p> <p>The Woodland Access Standard aspires:</p> <ul style="list-style-type: none"> □ That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. □ That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes. <p>The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication <i>Stemming the flow</i> - the role of trees and woods in flood protection - https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/.</p>
Individual	<p>Before any further development in Puckeridge/Standon goes ahead, the infrastructure needs to be addressed. Major priority must be to control the traffic, so that people can exit from Station Road on to the A120 safely, and to control the traffic on the A10 roundabout so you can cross onto the A120 safely from Ermine Road. Puckeridge-Standon can't cope with the traffic, streets lined with cars, were people with no parking space have to use the roads to park, High St and Station Road are two examples.</p>

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	<p>The Council need to fix some of the problems they have at the moment before going ahead with further developments.</p>
Individual	<p>I refer to Paragraph 5.36 under Policy SP6 (page 33) of the Standon Parish Neighbourhood Plan, Submission draft. This paragraph now clarifies that the hamlet of Wellpond Green is considered to be a group 3 settlement for the purposes of the Plan, where limited infill development will be acceptable provided it is identified in an adopted NP. I am writing to say that I wish my land at Highfield Nursery, Wellpond Green, to be identified in the Plan for consideration for future infill development. Total area at Highfield is 6.5 acres.</p>
Individual	<p>It appears Standon village is being strangled by housing developments. There's no consideration with existing residents concerned with medical access, which now one has to wait 3-4 weeks for an appointment, schools are at bursting point and traffic in the area is getting much more busier than ever.</p> <p>Standon gets flooded at times so no plans to improve drainage at all. Also public transport has been reduce through Standon, where once a direct route to airport – Lister hospital, is longer possible because you withdraw and changed buses times, routes and access.</p> <p>Standon is becoming a nice village which now will become a small town.</p>
Individual	<p>As a resident of Puckeridge my concern is the flooding that occurs at the Northern end of Station Road, drains have been cleaned, but they still do not take surface water away.</p> <p>Tributaries at the northern end of Station Road, although fairly clear, are not adequate enough to take away anymore surface water from these new houses that are proposed to be built on Café Field. I understand there will be lakes put in, but when they are full the water can only go one way to the tributary. Up stream of Puckeridge no work has been carried out on the tributary that comes into Puckeridge from the old A10 road by St Edmunds college meaning silt, leafs and anything else can work down into Puckeridge.</p> <p>Recently after the snow and rain, Paper Mill Lane in Standon flooded and you were able to cross the bridge, proving area still liable to flooding. Before anymore building work takes place I would like to see drains and tributaries corrected.</p> <p>At peak times it is becoming very difficult to cross the A120 at South Road and the Southern end of High Street Puckeridge, due to high amount of traffic. With the building of these new houses (where there is very limited amount of work) it means most people will have to use a car to get to work.</p>

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	In the Link magazine (winter 2016) the Council talk of wanting to include green travel plans i.e. cycle lanes, walkways new bus routes to reduce pollution. I do not see any of this happening.