

Gilston Area Neighbourhood Plan Consultation: September – October 2019

General Comments:

The Gilston Area Neighbourhood Plan (GANP) presents a positive planning document that seeks to shape development and is responding to the strategic priorities in the development plan. However, there is still significant work that is necessary to review the draft Plan to ensure the policies in the GANP are clearly written, deliverable and produce the outcomes that are intended by the policy-makers.

The NPPF requires Plans to contain policies that are clearly written and unambiguous, as well being justified and effective. The GANP would benefit from revisiting a number of areas to ensure that the Plan is compliant with this section of the NPPF. Clarity in language, brevity and succinctness is encouraged and should be aimed for particularly regarding the policies in the draft Plan.

East Herts, as the Local Planning Authority (LPA) have made comments in the following pages to hopefully assist the Neighbourhood Plan group (NPG) ultimately meet the Basic Conditions that will be tested through an examination. Currently, outstanding issues remain around the effectiveness and deliverability of the policies set out in this Plan. In order to ensure that the Neighbourhood Plan produces the outcomes intended by the writers these issues need to be addressed and clarified. Issues also remain around the justification and community engagement behind some of the policies – the NPPF is clear that Plans must be shaped by early, proportionate and effective engagement between plan-makers and communities and also based upon proportionate evidence. In some cases it is unclear where the community and evidence has shaped the policies within the draft Plan. It should be understood that the planning process frequently requires the use of balanced judgements with weight afforded to various considerations, therefore the GANP should ensure that it clearly articulates the matters that are of greatest importance to the community.

The GANP should also have a holistic Policies Map that draws together the geographical designations and various policies throughout the Plan.

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

Section/Objective /Policy	Page No.	Comment
Chapter 1: Introduction		
1.1	5	<p>For the sake of clarity the second part of the 1st sentence should note that the green belt was released when the District Plan was adopted, in order to accommodate the strategic allocated site known as the Gilston Area (GA1). Consider re-wording the first sentence to the following:</p> <p><i>"In October 2018 the East Herts District Plan was adopted, with this the area surrounding the villages of Eastwick and Gilston allocated for</i></p>
1.3	5	<p>The final sentence refers to the Plan being 'made' after the referendum. To reflect recent changes and the formal process the line <i>'Once 'made' after the Referendum...'</i> should be changed to say;</p> <p><i>"If more than half of those voting vote in favour of the Neighbourhood Plan, the Plan will come into force as part of the statutory development plan alongside the District Plan."</i></p>
1.4	5-6	<p>In relation to the bullet points, whilst it appears that you are trying to bring to people's attention the ways in which the Parish Council has participated or could in the future. For the purposes of Neighbourhood Planning this section isn't relevant and adds unnecessary detail that could be briefly summarised within a paragraph elsewhere.</p>
1.7	6	<p>Bullet 3 - It is unclear who is required/expected to produce the comprehensive landscape masterplan for the whole area (including the existing settlements) as this by implication extends beyond the Policy GA1 area allocation. It is advised that wording is revised to provide clarity.</p> <p>Bullet 5 - It is advised that it be clearly indicated whose priority the projects are, and what engagement with statutory bodies has informed these as priorities.</p> <p>Bullet 6 - It is unclear whether the GANP is setting out the Delivery Strategy or identifying the need for a</p>

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		delivery Strategy to be prepared by the applicant/bodies responsible for delivery of development in Policy GA1. It is advised that wording is revised to provide clarity.
1.21 – 1.22	10	It is advised that it would be useful to identify and be clear throughout the GANP, and particularly within the supporting text of each Policy, specifically which evidence has informed the policies in the Plan.
1.25	11	Again, unsure what relevance noting fundamental concerns has to forming a Neighbourhood Plan. Your Plan is formed around the objectives and visions in the later chapters as well proportional evidence and community engagement.
Figure 2	12	In order to avoid ambiguity it is advised that definitions should match those of Figure 11.1 of the EHDC District Plan including: 'Site allocation developed area' and 'community trust open space land' to ensure consistency.
Chapter 2: Planning Policy Framework		
2.1 – 2.45	13-23	<p>Whilst it is appreciated that some policy context is useful – 10 pages that duplicate and repeat much of National Policy and guidance, then the same with Local Policy and the Garden Town does not aide the readability of this document.</p> <p>It might be better instead to summarise the issues that are really pertinent to this Neighbourhood Plan – such as the short, concise summary in paragraphs 2.18-2.21 and then make reference to extracts of the actual policy which could be detailed within the appendices.</p>
2.3 and 2.4	13	References should be provided to this definition of Sustainable Development.
2.15	16	Bullet 8 - Spelling: "... and sites of biodiversity value"
2.25	18-20	The statements included relate not just to Policy GA1 as indicated but also the supporting text of chapter 11 of the EHDC District Plan. It is advised that opening wording is revised to acknowledge this.
2.25	19	Grammar: "... are allocated to be developed."
2.25	19	Open Space - There is an incorrect quotation of the District Plan used which replaces and introduces new words. It is advised this should be corrected to ensure consistency.
2.44	23	It is advised that wording should be clarified regarding "the framework of the Harlow and Gilston Garden Town Board". The Board does not in itself establish a framework. Advised that wording might be amended

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		to "... the guidance of the Harlow and Gilston Garden Town".
2.45	23	The Gilston Area Concept Framework was agreed, together with the accompanying report (Gilston Area Concept Framework and Planning Process, East Herts Council Executive, 12 June 2018) as a material consideration for Development Management purposes in July 2018.
Chapter 3: Local Context		
3.10	27	Bullet 2 - Sentence is unclear, advise rewording.
3.14	29	Assumed reference is to Parndon .
3.22	30	The remaining Chapter relates to Local Context, however, this paragraph appears to relate to objectives of the community which might be better set out with Chapter 4 of the Plan.
Figure 8	31	It is advise that captions for each image indicating the subject, location and what is particularly relevant about that image would add greater usefulness for future users of the GANP.
Chapter 4: Vision and Objectives		
Introduction	34	<p>The introduction states that <i>'the vision and objectives are the result of collaborative joint work between the community, the local authority and the promoters of the development.'</i></p> <p>Whilst the vision and objectives in the Concept Framework might be the result of joint work the visions and objectives in the Neighbourhood Plan are not. The different contexts of the two documents are distinct and therefore you should be careful not to say that other parties have jointly progressed the Neighbourhood Plan when they have not. Once visions and objectives are set out in the GANP they become those proposed of the community.</p> <p>If the intent is to adopt the identical Visions and Objectives of the Concept Framework then the GANP might wish to state that, the Visions and Objectives of the Concept Framework are X and, that it is the intent of the GANP to adopt these for reasons of Y, therefore the Visions and Objectives of the Community through the GANP are also thus.</p>
4.1 - 4.2	34	Focus needs to be moved away from the consultation and endorsement of the Concept Framework and instead onto the endorsement and consultation of the Neighbourhood Plan. Again, it should be noted that

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		the contexts are different and so this Plan needs to set out why the Visions and Objectives are suitable for this Neighbourhood Plan and its community.
4.3	34	<p>It is advised that clarity is provided regarding the agreement to which this first sentence relates and the parties to that agreement.</p> <p>The second sentence of the paragraph states that a landscape led approach will be adopted – it is not however in a Neighbourhood Plan’s gift to determine such an approach, but only to suggest and evidence why such an approach might be used. Instead this should be reworded to say that a ‘landscape led approach is encouraged’. Likewise later in the sentence wording should be changed to suggest that the existing landscape ‘could’ be used to create an attractive place to reflect that the NPG will not be the developers of this site.</p>
4.4 (II)	34	The first sentence of II under Vision should be deleted as the location has already been determined through the District Plan.
Vision	34-35	<p>Where the word ‘will’ is used to describe an action (e.g. ‘<i>Every new village will be designed using a palette...</i>’), it should be replaced with the word ‘should’ or similar. The NPG will not be directly delivering this development and so it cannot determine what will be delivered with certainty – it can only shape development through its policies.</p> <p>It is further noted that the Vision appears to be a rearrangement of text from the Concept Framework Vision which have in places been altered and added to. For example, Part II. appears to be entirely new and parts I. and IV. and VIII. have been added to or altered, generally throughout the Vision has been rearranged with the order of text changing which might change the meaning of that text where previously it formed a part of a larger paragraph. The editing has not been explained in the introductory text. Where the Vision is based upon the Concept Framework it is advised that that should be acknowledged and faithfully recreated, where a Vision is proposed to be adapted or added to by the GANP it is similarly advised that this is acknowledged.</p> <p>In the case of the later it is advised that consideration is given to whether there is any value in adapting an</p>

Section/Objective /Policy	Page No.	Comment
		<p>existing vision statement where this has been indicated elsewhere in the GANP as representing an agreed form, this risks undermining that existing vision. Similarly as the GANP is indicated as having been based upon the Concept Framework that contains the original vision its adaptation should be considered in the context of how this might risk undermining the implied foundation of agreement and evidence of the GANP.</p> <p>Appendix 3 of the GANP for example seeks to articulate the links between the GANP policies to the District Plan and the Concept Framework and explicitly states this link is to the “Endorsed Concept Framework (2018) Vision” and therefore not necessarily the Vision set out in the GANP.</p> <p>This section needs to be clearly defined and needs to be linked back to the introduction of the Vision and Objectives chapter. The vision should be shaped by community engagement and be stated anew as the adopted Vision of that community, regardless of whether it has been previously endorsed.</p>
Objectives	36-40	<p>It is again noted that these Objectives appear to be a rearrangement of text from the Concept Framework Objectives which have again in places been altered and added to. For example:</p> <p>Objective 1: reference to “with most developments fronting directly and overlooking the green spaces” and “The streets will be easily navigable and permeable, with streets treated as vibrant and active spaces to promote inclusive communities” have been omitted (Concept Framework, page 74);</p> <p>Objective 2: the addition of the word “equally” changes the objective in respect to provision of infrastructure for new development and existing communities”</p> <p>Objective 4: the addition of text in relation to the Stort Valley “preserved for its natural and water-related character” and changing of the word “natural” to “rich in biodiversity” in relation to Green landscape and the addition of text “rather than designed and managed like urban parks”;</p> <p>Objective 5: the change of wording from “long distance views” to “rural open setting”;</p> <p>Objective 6: the addition of “by walking, cycling and bus” and “new and existing”; and, in respect to parking, the addition of “and carefully managed to minimise the visual impact on the street scene and to encourage walking, cycling and the use of public transport”;</p>

Section/Objective /Policy	Page No.	Comment
		<p>Objective 7: "Walking and Cycling will be prioritised within each village" has replaced "safe and secure layouts designed to minimise conflicts";</p> <p>Objective 8: omission of Essex villages as an inspiration; "adopted" has replaced the word "explored" in a generally reworked text relating to layouts and building lines; a qualification has been added in respect to back fences onto green areas being avoided where "for public use"; new text has been added in respect to "durable and high-quality buildings and public spaces";</p> <p>Objective 9: this has been significantly redrafted throughout;</p> <p>Objective 10: there is minor redrafting throughout;</p> <p>Objective 11: addition of "early on" in respect to the transfer of land into community ownership;</p> <p>Objective 13: addition of "and phased to minimise and manage the impacts of the development on the local area";</p> <p>Where the Objectives are based upon the Concept Framework it is advised that that should be acknowledged and faithfully recreated, where an Objective is new or proposed to be adapted or added to by the GANP it is similarly advised that this is acknowledged.</p> <p>As with the Vision, it is advised that careful consideration is given to the value of recreating and rewriting Objectives where these are based upon a document that is indicated elsewhere as forming an agreed position and the foundation for the GANP.</p> <p>Appendix 3 of the GANP for example seeks to articulate the links between the GANP policies to the District Plan and the Concept Framework and explicitly states this link is to the "Endorsed Concept Framework (2018) Objectives" and therefore not necessarily the Objectives set out in the GANP.</p> <p>As with the vision, the objectives should be shaped by community engagement and be stated anew as the adopted objectives of that community, regardless of whether they have been previously endorsed.</p>
4.5	41	Typo: para 4.5 should be 4.6

Neighbourhood Plan Policies: General Points

In the introductory text to the Council's response it was noted that the GANP would benefit from clarity to provide clear and unambiguous policies that will help the decision-maker to shape growth in the way that the GANP intended. In most cases, the Council's comments draw attention to areas where further clarity is needed but the need to address clarity is not limited to these points only. Likewise, comments also relate to the expectation that proportionate evidence is needed to inform the policies themselves which isn't always clear. It is not always clear where the community have shape the formation of policies either.

The introductory text for each Policy is split into "Rationale and Justification" and a separate heading for "Community Perspective". These different sections, however, frequently appear to both provide perspectives rather than limiting the initial text to factual context based upon the District Plan and Concept Framework followed by the community perspective setting out the related key matters as viewed by the community through consultation. This area in particular should be improved to help clearly identify the overall rationale behind the policies.

A general issue that is prevalent throughout is that Policies, as drafted, frequently appear to state what is going to happen, however the NPG is not the landowner/developer nor is the LPA that will use the GANP for decision-making. It is strongly advised that the Policies should be revisited so that their drafting provides clear guidance on the development and use of land, to both the landowner/developer and the decision-maker, and what considerations should inform proposals for development and the decisions made upon them.

Chapter 5: Neighbourhood Plan Policies		
5.1	42	This should say that it supports the vision and objectives of the Neighbourhood Plan – not the concept framework.
5.5	44	The first sentence states that the intention is to develop the Gilston Area as a series of villages. The Neighbourhood Plan is unable to speak of the intention of the developer but should instead highlight that development should be in accordance with Policy GA1 Part III which refers to distinct villages.
5.11	45	The community is concerned that 'major development'?
Policy AG1	46	Policy AG1 needs comprehensive re-wording in order to function as intended. It is the assumption that

this policy relates only to 'Major Development' rather than 'all development'. This distinction should be clearly made and emphasised otherwise this policy could end up being applied to all development proposals irrelevant of their size or scale.

Criteria 1 – this criterion states that proposals 'must be put forward' in the context of the overall development. Instead of using this terminology it might provide more clarity if the sentence is changed to read 'proposals *should consider* the context of the overall development of the Gilston Area and should demonstrate that it has not been considered in isolation'. That said, GANP might want to consider whether this criterion is necessary given Policy DES1 (III) and DES4 of the District Plan and whether it is unnecessary repetition.

Criteria 2 – Unsure what the word 'positively' contributes to the criteria, consider deleting to provide clarity. Delete 'relationship'. Also delete reference to 'new' settlements as Gilston, Eastwick and Hunsdon are existing settlements. Add the term 'where possible' into the latter part of the criteria to acknowledge that this isn't achievable in all cases. Delete 'in line with new development' as this doesn't add any value to the criteria. Policy could be reworded as below:

"Proposals must demonstrate how they have considered the existing settlements of Gilston, Eastwick and Hunsdon, in respect to their character and setting. Where possible proposals should seek to enhance the landscape setting of these existing settlements and their access to services and facilities;

Criteria 3 – covers a number of varying areas of planning. This policy refers to scale, location and form of development, as well as living and working environments, and local services, all of which could relate to individual policies and would benefit from considerably more detail in order to be successfully utilised. The main point of the third criteria is to introduce the sub-criteria, consider deleting Criteria 3 and instead replace with:

"In order to assist the creation of sustainable development across Policy GA1, new development should:"

Sub Criteria -

		<p>i. “existing rural landscape assets” are not defined. It is advised that criteria i. , vi. and ix. could be combined to provide clarity on the nature of a landscape asset. It is advised that “Predominance” of the landscape setting should be articulated as relating to the entire Neighbourhood Plan Area and not individual development areas where this would be contrary to the delivery of the Development Plan allocation.</p> <p>ii. The term ‘balanced’ may benefit from being defined in the supporting text.</p> <p>iii. This has already been covered in criteria 2 – delete.</p> <p>v. Heritage and character is covered in policy H1 and doesn’t need repeating.</p> <p>vi. Needs to be more specific about what villages are being referred to, is this the existing villages?</p> <p>ix. following the adoption of the District Plan the Green Belt was removed from the area covered by Policy GA1. Some areas of Green Belt still remain within the Neighbourhood Area but are not the subject of any development within this Plan. This point needs to be clearer as to what the expectations are on a development proposal that comes forward.</p> <p>x. Delivering all infrastructure in advance of requirement is an aspiration but in many cases not deliverable for a variety of reasons. Consider the use of the phrase ‘where possible’ to promote advanced infrastructure provision but also to recognise that it is not always deliverable.</p>
5.14	47	The first sentence refers to ‘guidance and policy documents’ but does not explicitly mention any. In order to help justify the inclusion of the policy, the documents should be clearly referenced.
Policy AG2	48	This policy is currently titled as Creating a Green Infrastructure Network but the policies appear to relate to a Landscape Masterplan. Thought needs to be given to whether it is better to refer only to Green Infrastructure rather than GI through the mechanism of a Landscape Masterplan which isn’t a requirement of the GA1 policy. It is also unclear who is responsible for preparation of an overall landscape

masterplan, how this accords with the development Plan allocation and how this is justified in advance of preparation of individual Village Masterplans. It is advised that further explanation and justification of this Policy is required.

Criteria 1 – This criterion is vague and in its current state is unlikely to be effective or achieve its intended goal. As this policy currently reads, it would require development proposals to justify that a landscape masterplan had been prepared prior to the preparation of a masterplan and the commencement of development. Considering that a development cannot commence without a planning consent this is a non-point. If the intention is instead to require development proposals to conform with a landscape masterplan then it should simply state that.

Again, whilst a Landscape Masterplan might be produced, it is not a requirement of policy GA1 it may be better to refer to GI network requirements outside of this context as these would still therefore be applicable in any context.

Sub Criteria:

i. Presumably this criteria is trying to explain that it wants the existing network of parks, woodlands and wildlife sites incorporated into any GI network? As it currently reads this is not being made clear.

ii. The first part of **point 1** of this criterion needs rewording in order to make sense “...and establishment of ample and wildlife”. The second part of this point might function better separately by saying:

- “Where possible consideration should be given to connecting any GI proposals with existing GI in the Stort Valley, Lee Valley Park, Epping Forest and Hatfield Forest”

Point 2 refers to the separation between villages, Policy AG5 already deals with this and with reference to GI and so it should cross reference to that policy rather than repeating.

Point 3 notes that walking and cycling access should be delivered but without encroachment into wildlife sites and the green separation between villages. This potentially conflicts with previous policy criterion that encourages the incorporation of wildlife sites into all GI. Likewise, a ‘green separation’ cannot prevent blanket encroachment – instead, the addition of a sentence such as “access is encouraged but should be sensitive to its environment”.

		<p>iv. Currently unsure how this criterion relates to GI. It either needs to consider views in the context of GI or should be deleted as views are considered in other policies.</p> <p>v. Again – this needs to be clear</p> <p>Criteria 3 – unless the NPG is intending to extend the woodlands then this needs to be reworded. It could be reworded as follows; <i>“Consideration should be given to extending or enhancing woodlands where appropriate. Management plans should also be considered at an early stage of the planning process.”</i></p> <p>Criteria 4 – This criterion contains areas designated as Local Green Space (LGS). Paragraph 99 and 100 of the NPPF set out the policies that allow for the provision of LGS and also the criteria that a LGS must fulfil in order to be designated as such. There is no supporting evidence provided to justify the inclusion of these current allocations to support the requirements of the points in paragraph 100 of the NPPF.</p> <p>Criteria 5 – further clarification is needed as to the responsibility for preparing the management and maintenance plans for these areas and how this will be secured.</p>
Figure 12	50	It is advised that evidence should be referenced that supports the designations on Figure 12 including the Local Green Space (see above) and Sensitive Historic Setting which should be defined.
Figure 13	51	This figure does not appear to be referenced in the GANP.
Policy AG3	53	<p>Criterion 1 – It might be worth the addition of a cross-reference to Policy GA1 in the District Plan to acknowledge that mitigation and impacts are in the context of a strategic development that will deliver around 10,000 new dwellings, employment areas and infrastructure. The addition of the words where possible would also be welcome and encourage a pragmatic approach to delivery of a strategic site.</p> <p>Criterion 2 – all references would benefit from being identified on a policies map.</p> <p>Criterion 4 – the addition of ‘where possible’ might be a pragmatic addition. It prevents sustainable modes of transport being discouraged by a requirement for natural finishes but also identifies a</p>

		<p>preference and aspiration simultaneously.</p> <p>Criterion 5 – add the words “...and where appropriate enhanced”</p> <p>Criterion 6 – Limitations on sports pitches could have adverse impacts to the success of community facilities and schools into the future. In particular:</p> <p>ii. Artificial surfaces and fencing are terms which can apply to a very wide range of treatments, it is advised that further consideration be given to what this policy criteria is seeking to achieve.</p> <p>iii. It is advised that “Exceptional Design” should be defined, for example reference be made to policy AG1 where “exceptional quality” has been defined in the GANP.</p> <p>v. It is advised that the unacceptable nature of an impact should be defined rather than using the term “no” impact which could be of any scale or nature.</p> <p>Criterion 8 – policy needs to be reworded to reflect that it might not be appropriate for all trees to be retained, but instead should consider where possible retaining trees that can contribute to the overall setting of the development.</p>
Paragraph 5.24	54	It is advised that reference to only “existing” buildings being the exception is not consistent with Policy GA1.
Policy AG4	55-56	<p>It is advised that the term “Country Park” has a special meaning as an area originally designated under the Countryside Act or as accredited by the local authority with the support of Natural England. Clarification may need to be provided if this term is used to this meaning and whether the Policy would support the accreditation criteria being met.</p> <p>Criteria 1-4 and 5-6 establish a series of arrangements that haven’t as yet been defined or agreed. This policy should be revisited and perhaps only focus upon detailing Criteria 4 further in order to shape the development of the area rather than the ownership and funding arrangements.</p>

		The Council welcome further discussion on this policy following the consultation period.
Policy AG5	59	<p>It is advised that “Community Boundaries” should be defined in the GANP if these are intended as a designation as indicated in Figure 18 (although this figure is not referenced in the Policy) with proportionate evidence to support why these designations are appropriate. This policy in general would benefit from further explanation, clarity of language and more backing in the supporting text.</p> <p>Criterion 1 – iii Views should be defined on a policies map in order to provide clarity around the description in this policy.</p> <p>Criterion 2 – suggest the deletion of the word ‘firm’ as this could be misinterpreted, or consider further wording defining this terminology.</p>
Policy AG6	64	<p>Examples should be provided/cited in the supporting text to support the policies and support whether the characteristics in the supporting text are asserted to be common to all Hertfordshire villages or are a local example that may form a consideration.</p> <p>Criteria 1-4 – all criteria are indistinguishable from the one another. Consider combining these criteria to provide one criterion that provides clarity and succinctness for the decision-maker.</p> <p>Criterion 6 – This is set out in Policy GA1 and does not need to be repeated.</p>
Policy AG7	66	<p>Criterion 1 – An Infrastructure Delivery Plan is an evidence document prepared by the Council, an alternative term may wish to be considered to avoid confusion.</p> <p>Criterion 2 – It is advised that requirements must be compliant with regulations, as such, reference should only be made to needs and not define existing and new.</p> <p>Criterion 3 - It is advised that consultation on infrastructure requirements is through planning applications where the public and stakeholders have opportunity to raise comments to the local planning authority. As worded this policy part 3 could provide a misleading public perception that this forms a separate process.</p>
Policy AG8	67	This policy relates to the provision of infrastructure for existing communities through development at GA1. This policy is currently in conflict with the Community Infrastructure Levy Regulations 122 (2) and

		<p>needs to be revised. Which state that;</p> <p>A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—</p> <p>(a) necessary to make the development acceptable in planning terms;</p> <p>(b) directly related to the development; and</p> <p>(c) fairly and reasonably related in scale and kind to the development.</p> <p>Stating a planning requirement for upgrades that do not relate to that development does not meet with CIL Reg 122. It is advised that the GANP should seek to encourage opportunities for improvements being considered when planning and undertaking infrastructure works.</p>
Policy AG9	69	<p>Policies in Neighbourhood Plan's should predominantly relate to land use and shaping development. It may be better to phrase this policy in the context of Policy GA1 and particularly part IV as well as the policy DES1 in the District Plan</p>
B. Delivering Quality Places		
Figure 20	71	<p>It may assist the reader to have locational information attached to the individual photographs.</p>
Policy LA1	72	<p>Criterion 1 – the requirements of village masterplans are set out in Policy DES1 of the District Plan. A policy within a Neighbourhood Plan forms part of the Development Plan and so should not limit itself to certain elements of the planning process. Delete “this will be required as part of the Village Master Plans”.</p> <p>The first part of the Criterion would benefit from some rewording as well, consider; “The design of each village should respond to the existing landscape character and topography, and seek to have a positive relationship with...”</p> <p>Criterion 3 – refers to the routes of pedestrian and cycle routes. This criterion is only loosely related to landscape and provides similar wording to that covered within a number of other policies throughout the document. Consider only one comprehensive reference to pedestrian and cycle routes in order to avoid repetition and variations that create confusion. Consider whether this criterion is better emphasised elsewhere.</p> <p>Criterion 4 – A masterplan is prepared in advance of development proposal as specified within Policy</p>

		<p>DES1 of the District Plan. The chronology of this criterion does not work, and again limits itself to only applying to one part of the planning process. Consider deleting the introductory text and instead using the sub-criteria as the main criterion. Sub-criteria iii refers to important views, have any important views been identified and justified within the neighbourhood plan. The effectiveness of this criterion depends upon the Plan's ability to demonstrate where and why important views exist. Otherwise, the policy should seek proposals to identify key views and demonstrate how they have sought where possible for these to be maintained.</p> <p>Criterion 6 – the first sentence of this criterion needs rewording to ensure its effectiveness as it is currently quite vague as to what it is trying to achieve. Secondly, limiting sports facilities to areas within village boundaries needs to be justified as there might be a reasonable case for sports facilities being located outside of those boundaries providing they are compliant with all other policies and can demonstrate that there is no harm. Further to this, village boundaries haven't been defined within the Neighbourhood Plan so the effectiveness of referring to them is questionable.</p> <p>Criterion 7 – this criterion needs to be reworded as it refers to the 'early planting of key landscape areas' which isn't feasible. The occupation of development based upon the maturity of trees is also not justifiable, but it is assumed this was not the intended requirement of the policy. Consider rewording for clarity.</p> <p>Criterion 8 – the perpetual provision of landscape management and maintenance should be aspirational and also needs to be clear about what landscaping and green spaces it refers to, presumably just those being brought forward by that particular development proposal.</p>
5.69	73	It should be noted that maintenance of trees and hedgerows rests with the landowners. It should be noted that landscape proposals relating to the implementation of Policy GA1 will typically cover the extent of the application boundary only unless off-site enhancement has been required based upon a definitive need to mitigate against the impacts of the development.
Policy LA2	74	This policy is likely to lack effectiveness as it refers to landscape improvements within areas that will not form part of an application boundary. It is sensible to maintain part 2 of the policy (with some rewording) as it relates to the integration of new connections with existing.

<p>Policy BU1</p>	<p>76</p>	<p>Criterion 1 – Presumably the final objective of this criterion is that developments have a defined character and individuality etc. Why limit this to the Masterplan process alone. Suggest deleting reference to master plans and instead focus upon development proposals. The use of the term ‘etc.’ within policy is not encouraged – likewise ‘contemporary interpretation of traditional character’ is likely to be a highly ambiguous term and should be set out and described somewhere in order to ensure effective compliance with this policy.</p> <p>Criterion 2 – The term ‘genuinely affordable homes’ should be removed as this cannot be directly controlled through planning policy, affordable dwellings and market dwellings are accepted terms. Consider whether this policy goes any further than Policy HOU1 in the District Plan – if not, consider deleting.</p> <p>Criterion 3 – Sub-criteria I refers to no development exceeding 33 dwellings per hectare in density. This is too prescriptive and has not been justified within the document. The criteria is then in conflict with sub criteria ii which states that higher densities might be acceptable in certain cases. Consider deleting both criteria and instead having one which could read as follows;</p> <p><i>“Residential development should provide variation in scale and height to create distinctiveness. Densities should be used appropriately respecting the character and the overall location of the development as well as the other policies within this Plan.”</i></p> <p>Sub-criterion iii needs to be reworded to provide clarity about its intentions and the term ‘sensitive views’ needs to be defined.</p> <p>Criterion 4 – typo after iv.</p>
<p>Policy BU2</p>	<p>78</p>	<p>Criterion 2 – in order to strengthen and provide clarity, the second part for the criterion could be reworded as follows;</p> <p><i>“to support the role of the village centre, the close location of nursery and primary schools to the centre should be considered”</i></p>

		<p>Criterion 4 – basing development heights upon the height of trees is both too vague and also too restrictive. Consider deleting the middle part of this criterion so that it reads;</p> <p><i>“The height of development will be required to respect village character. The location for taller buildings should be considered throughout the planning process”</i></p>
5.86	78	Define what market and affordable employment space is.
Policy BU3	79	<p>Criterion 1 – Policy GA1 states that employment areas should be located in visible and accessible locations not explicitly within the village centres. Consideration needs to be given to the event that a suitable location comes forward that isn’t within a village centres and this policy could prevent that coming forward.</p> <p>Criterion 2 – conflicts with Policy ED1 in the District Plan.</p> <p>Criterion 3 – requires greater definition in order to be effective.</p> <p>Criterion 4 – in order to deviate from the parking standards set by the District Council, justification and supporting evidence is required. Consideration might instead be given to what is sought to be achieved by this and how that might be articulated.</p> <p>Thought needs to be given to how this policy relates with, and adds further details to those policies set out in Chapter 15 of the East Herts District Plan.</p>
BU4	80	<p>Criterion 2 – refers to ‘all streets’ and then names ‘connecting and main roads’. The policy needs to be clear to what it is referring to and should be one or the other. Presumably ‘road speeds’ is referring to the speed of cars on the highway, further detail is needed here to determine whether natural measures or engineered measures are required. If so, consideration needs to be given to whether lowering road speeds throughout a development is a priority on <i>all</i> roads.</p> <p>Criterion 4 – thought needs to be given to whether ‘minimal street lighting’ conflicts with the priority of</p>

		<p>assisting pedestrians and the legibility of development. Street lighting will be determined by the status of roads in any case, if the road is adopted then it will be subject to County Council standards.</p> <p>Criterion 5 – please define a countryside tree and hedgerow.</p>
Policy H1	83	<p>This policy relates to heritage assets but does not at any point define or identify heritage assets. For this policy to be effective it should identify exactly what it considers a heritage asset.</p> <p>Criterion 1 – consider using the word ‘should’ instead of ‘will’ in the second sentence to reflect that open space isn’t likely to be brought forward by the Neighbourhood Plan, it is also repeated in criterion 3 part ii so might not be necessary here..</p> <p>Criterion 2 – change ‘will be’ to ‘have been’. Consider deleting the last part; ‘so that their meaning will not be lost’, as ‘meaning’ is ambiguous.</p> <p>Criterion 3 – consider changing the intro from ‘will also be required’ to ‘should:’. Sub-criterion ii and iii are duplicates of Criterion 1 – consider deleting one or the other to prevent unnecessary repetition.</p> <p>Criterion 6 – should state that <i>“Any overall masterplan should identify heritage assets and a clear approach for their protection and where possible, enhancement should be incorporated into the overall masterplan.”</i></p> <p>Criterion 7 – This criterion says that ‘management plans <i>will</i> be developed for...’. Are the Neighbourhood Plan group committing to produce management plans? If not it should be reworded to suggest that management plans could supplement heritage conservation and should be considered.</p>
Policy C1	85	<p>This policy and its supporting text would benefit from greater clarity of what a community facility is. Currently the policy and its supporting text could wrongly be interpreted as referring to strategic infrastructure such as schools, highways or utilities which are subject to complex mechanisms of delivery. Please revisit this policy to provide further clarity.</p> <p>Criteria 2 & 3 – both criterion appear to cross reference infrastructure and community facilities. Whilst community facilities are an essential part of infrastructure provision clarity needs to be found to ensure</p>

		<p>that strategic infrastructure is not confused with these policies. E.g. cumulative needs and capacity relate more readily to strategic infrastructure provision not that of community facilities.</p> <p>Criterion 4 – reference to master plans should be deleted so that policy applies to all development proposals. It is unclear what this policy wants to achieve, if it is attempting to suggest that community facilities should be located where possible within walking and cycling distance it should clearly word this.</p>
Policy C2	86	<p>Criterion 1 - It is advised that the timing of creation of a community trust or similar is not defined in the District Development Plan, requiring this to be completed prior to commencement of any works, including works necessary to enhance that area would need to be demonstrated by the NP as not compromising the delivery of allocation Policy GA1 including both developed and open spaces.</p> <p>Criterion 2 – again, for clarity, unless the Parish Council is developing a governance strategy this policy should say ‘should’ instead of ‘will’.</p> <p>Criterion 3 – the transfer of land to community ownership should not be determined through planning policy in a neighbourhood plan. Instead this policy could state that the timely transfer of land into a community trust is encouraged to ensure consistency in GA1. Unsure what funding is being referred to in this criterion – please define.</p>
Policy TRA1	88	<p>Criterion 1 - It is advised that the HGGT Transport Strategy is presently a draft guidance document that has not yet been consulted upon.</p> <p>Criterion 2 - (i) certain terms should be defined for example “innovative mobility” for clarity. This includes reference to ‘through traffic’ that needs to be explained as the Neighbourhood Plan Area contains existing roads including the A414 and links between local settlements.</p>
Policy TRA2	89	<p>It is advised that walking and short cycling distances should be defined for clarity. Consideration should be given to whether this Policy is consistent in terms of the access for existing communities with other policies in the GANP that seek to restrict the location of uses and the location of walking and cycling routes and whether those policies should be revisited.</p>
Policy TRA3	91	<p>It is advised that this policy is likely to need to be revisited and engagement with the highways authority is recommended including in relation to the NPPF test of ‘severe’. Criterion 4 is too restrictive and needs to</p>

		be revisited, a zero tolerance of construction vehicles will impact on the strategic priorities within the District Plan and as is rightly mentioned in Criterion 5, will form part of a construction management plan.
Policy EX1	93	<p>This policy needs to be revisited.</p> <p>The policies within the rest of the Plan should be aimed at reducing negative impacts upon the existing communities by identifying and detailing areas that are exceptional to the community. The use of a policy that requires any development to enhance existing settlements without any details is not justified and would impact upon the strategic objectives within the District Plan.</p>
Implementation and Delivery	94	The 3 stages highlight additional requirements of the various planning stages but the requirements are not set out in the form of policies and so will not be treated as such. This section as a whole does not put forward any policies or set out how the NPG will use their Neighbourhood Plan to assist in the implementation or delivery of its objectives. Consider re-writing this section to focus less on the planning application process and instead on the delivery of the Neighbourhood Plan's objectives.
7.1	94	Paragraph 7.1 makes reference to 'Figure xx' presumably this is an unfinished reference and needs to be updated with a complementary Figure/diagram.
Monitoring and Review	95	<p>Please remove reference to East Herts Council from paragraph 7.4 as you cannot commit the LPA to monitoring a Neighbourhood Plan unless this has been established beforehand. The LPA will monitor certain aspects of Neighbourhood Plan's progress across the District but this is dictated by the Council itself and various regulations, not by the Neighbourhood Plan group.</p> <p>In summary, this section needs to reflect how the NPG will monitor its own Neighbourhood Plan.</p>