

# **Wheathampstead Parish Council**

## **Wheathampstead Neighbourhood Plan 2020-2035**



## **Consultation Statement**

**January 2021**

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## **1. Introduction**

- 1.1 The policies contained in the Wheathampstead Neighbourhood Plan (WNP) have been developed as a result of extensive interaction and consultation with the community and businesses within the area. This engagement process has been an integral part of the work since the inception of the Neighbourhood Plan in 2015 and has included articles in the parish newsletter, surveys, public exhibitions and presentations to community groups.
- 1.2 This Consultation Statement has been prepared in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012, which requires that a consultation statement should:
- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted; and
  - describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

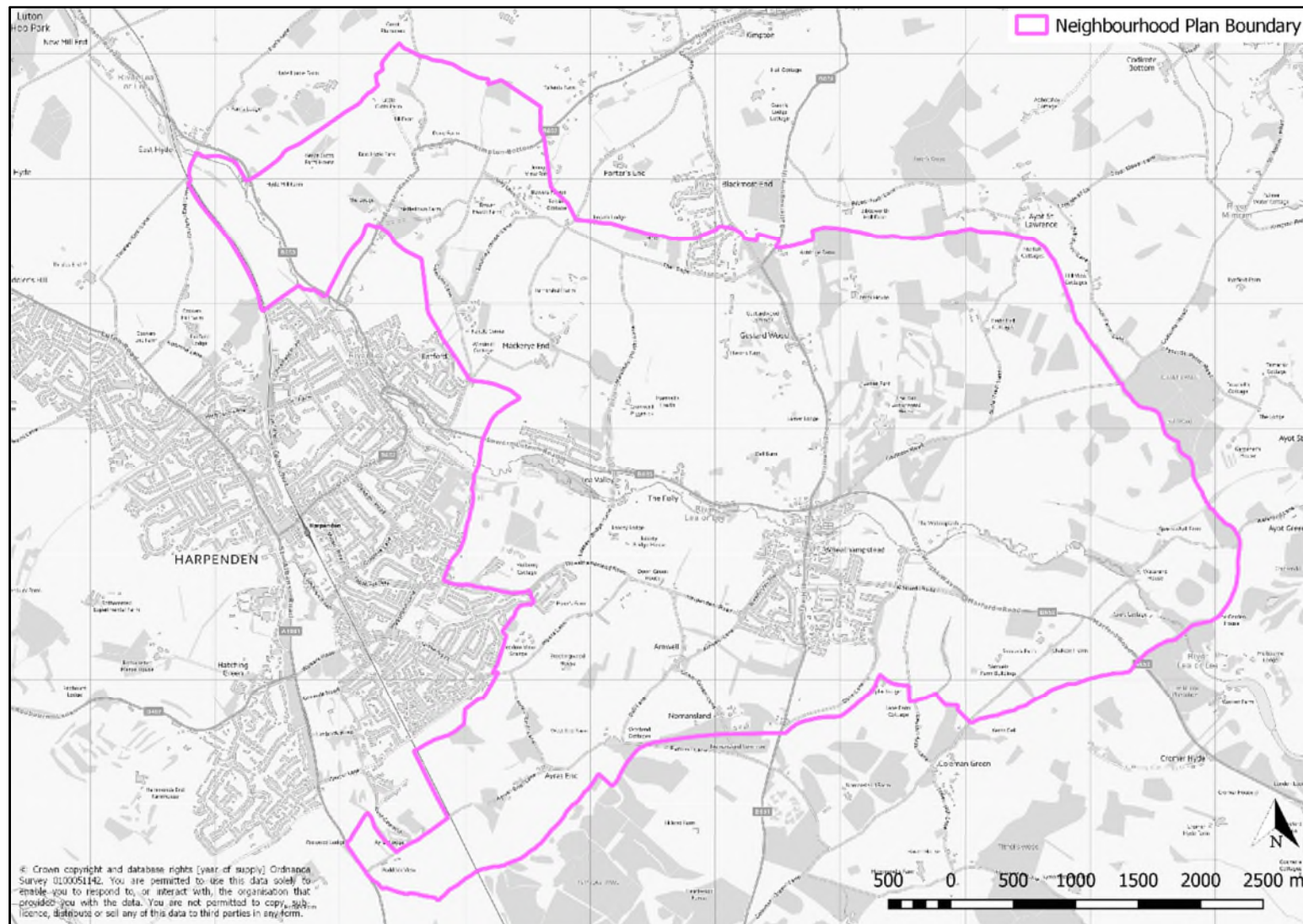
### **Wheathampstead Neighbourhood Plan Steering Group**

- 1.3 In 2015 the Parish Council decided that it would like to develop a neighbourhood plan for the parish to enable it to have a greater influence over land-use and planning in the area. It applied to St Albans City and District Council (SADC), as the strategic local authority, to designate the neighbourhood area, and this was confirmed on 21 July 2015. A map of the designated area is shown in Figure 1.1.
- 1.4 An appeal for volunteers was issued locally, followed by a meeting in September 2015 to introduce the idea of the Plan and what it might achieve. This led to the formation of the Neighbourhood Plan Steering Group (NPSG), comprised of parish councillors and local residents underpinned by a Terms of Reference. Whilst membership of this group has changed over the years, its commitment to the Plan has been focussed throughout. Each member took responsibility for a particular theme to explore, and additional volunteers were convened within Working Groups to explore these.

### **Supporting documents and evidence**

- 1.5 The Submission Version WNP, is supported by this Consultation Statement, a Basic Conditions Statement and an extensive evidence base. It has also been subject to a Screening, which ascertain that it requires neither a Strategic Environmental Assessment nor a Habitats Regulations Assessment. The Determination Statement is included within the Basic Conditions Statement.

# Wheathampstead Neighbourhood Plan Consultation Statement



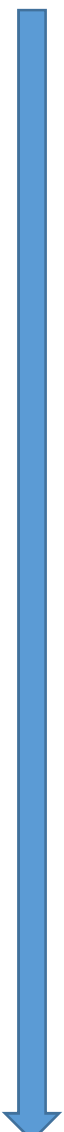
*Figure 1.1. Wheathampstead Neighbourhood Plan Boundary*



## 2. Summary of engagement and consultation activities, issues and outcomes

2.1. An important part of the Neighbourhood Plan process has been to ensure that all residents and those with an interest in Wheathampstead parish have had an opportunity to input into the work. The NPSG has spent a great deal of time and energy speaking to as many individuals, local groups and businesses as possible throughout the process. There has been ongoing engagement with the community – to share and disseminate information and to seek input - and also some key consultation activities at strategic points in the process. Throughout the whole process the Steering Group has met frequently and these meetings have been open to the public.

2.2. A summary of the significant programme of engagement and consultation is:



Date	Milestone	Key activities
2015	Parish Council decides to undertake a neighbourhood plan	<ul style="list-style-type: none"> <li>Neighbourhood Area designated</li> <li>Neighbourhood Plan Steering Group formed</li> <li>Working groups established</li> <li>Introduction Training on NP's provided by external consultants</li> </ul>
2016 to 2017	Community engagement to gather evidence on each topic	<ul style="list-style-type: none"> <li>Draft vision and strategic objectives created</li> <li>Ongoing programme of community events to engage on particular WNP topics</li> <li>Face-to-face meetings with local groups and interested parties where necessary</li> <li>Local Business survey</li> <li>Various updates provided parish newsletters, social media etc.</li> <li>Local Housing Needs Survey undertaken</li> <li>Local Call for Sites issued</li> </ul>
2018 to 2019	Developing and testing the options	<ul style="list-style-type: none"> <li>Feedback from the community and refined vision, objectives and emerging policies displayed and discussed locally</li> <li>Informal consultation on draft plan to enable preparation of Pre-Submission Version</li> </ul>
2020	Regulation 14 Consultation	<ul style="list-style-type: none"> <li>Plan consulted for 8 weeks in April 2020</li> <li>All households sent a summary document and feedback survey</li> <li>Comments reviewed and Submission Version Plan finalised</li> </ul>
2021	The final stages	<ul style="list-style-type: none"> <li>Submission of Plan to SADC</li> <li>Regulation 16 Consultation</li> <li>Examination</li> <li>Referendum</li> </ul>

2.3. The sections below describe, in fuller detail, the engagement and consultation process which took place during the course of the Plan preparation, divided into five main stages:

Stage I: Engaging the local community to understand main issues

Stage II: Exploring housing need and supply in the parish

Stage III: Developing and testing the emerging planning policies

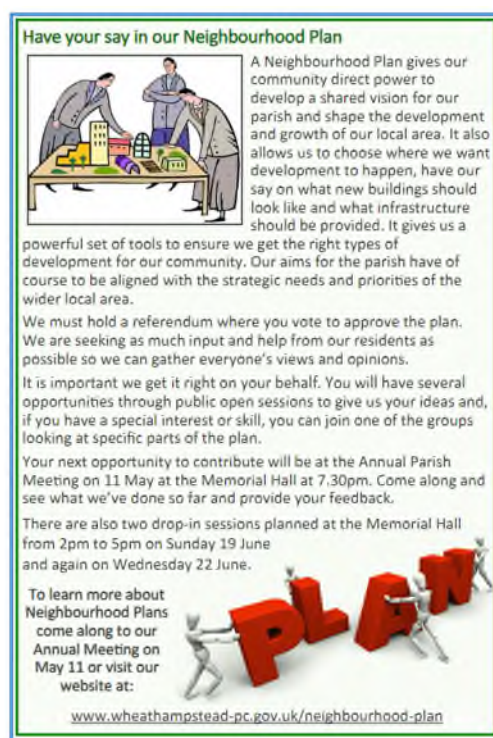
Stage IV: The Pre-Submission (Regulation 14) Draft Neighbourhood Plan

Stage V: Finalising the Submission (Regulation 16) Neighbourhood Plan

## Stage I: Engaging the local community to understand main issues (2015 to 2018)

### Launch Community Exhibitions

- 2.4. Following the decision by Wheathampstead Parish Council (WPC) to undertake a Neighbourhood Plan, a public meeting took place in September 2015 to share information about the plan, the process and to encourage people to volunteer take part. An initial discussion was also convened to seek views on important issues. This was advertised widely, including in the Parish Council newsletter, the Pump, the Parish Council website, an article in the Wheathampstead and District Preservation Society (WDPS) newsletter and on social media.
- 2.5. At the first NPSG meeting, a Terms of Reference was discussed as well as a project plan for the work ahead. A schedule of public engagement events was established, the first to



coincide with the Annual Parish Meeting on 11 May 2016 to explore a draft vision statement and objectives, housing, community facilities and transport.

- 2.6. The initial *Publicity for the Annual Parish Meeting* exhibition was well attended and revealed local concerns about local transport issues, in particular inadequate parking provision, and local

housing. On the latter the NPSG agreed that it would be helpful to identify local housing need in the parish. Some members of the NPSG attended a SADC workshop event to learn more about how this could be undertaken.

2.7. The next set of public workshop days were confirmed for June 2016 to focus on:

- Housing (design of residential development, housing mix, care home provision)
- Transport and movement (highway improvements, walking and cycling, public transport provision, car parking)
- Character and conservation
- Community facilities (health and leisure provision, schools)
- Environment (local green space, loss of public open space, flooding and drainage)
- Town/village centre and economy (Wheathampstead town/village centre, protection of existing commercial premises or land, new employment opportunities, rural economy)

2.8. In readiness for this, and bearing in mind information received so far and the combined knowledge of the NPSG, a draft vision statement and strategic objectives for the WNP were developed. These would also be displayed at the events to seek feedback. The events also provided an opportunity for other organisations to undertake engagement – the fire service and SADC – which would help to encourage greater footfall.

2.9. Event attendees were encouraged to read the displays and provide feedback on the flipcharts and post-it notes supplied. Coloured stickers enabled people to demonstrate where they agreed with an existing comment. Members of the NPSG were on hand to answer questions and help record feedback.

2.10. The events were promoted through the usual local channels as well as via posters for WPC noticeboards and leaflets distributed via local shops and organisations. The schools and nurseries were encouraged to attend.

#### Engaging local business

2.11. Members of Wheathampstead's Business Group (WEB) were encouraged to complete a survey with questions aimed at understanding what factors would help them. This led to the inclusion of "tourism promotion" as a topic to be explored within the economy section.

2.12. Public realm was also raised as an issue within the village centre, and the Preservation Society expressed a keenness for their Guidance document relating to Signage to be included in the WNP.

#### Face to face meetings

2.13. Members of the NSPG and Working Groups met frequently with local organisations, community groups and special interest groups took place during this initial fact-finding stage. In addition, ongoing contact was established with officers at SADC. In combination

with this engagement, the Working Groups also assembled evidence that would help to underpin the topics being highlighted as important for inclusion in the WNP.

- 1.6 Throughout this period, more and more detail was added to the emerging Neighbourhood Plan and the potential policies that it might contain. The outcome of this was an agreed vision and objectives and a set of themes and emerging policies to deliver these. It had also led to the creation of a set of 'SAFE' 'SAFE', an aspiration for Wheathampstead to become a “**S**ustainable **A**ccessible **F**air and **E**cological Community” where the policies and associated actions contained in the Neighbourhood Plan should contribute as follows:

We have a thread running through our plan



- **SUSTAINABLE**: development and other activities conducted without depletion of natural resources
- **ACCESSIBLE**: development meeting the needs of all users (cyclists, walkers, disabled, etc.)
- **FAIR**: development treats people equally without favouritism or discrimination
- **ECOLOGICAL**: maximising the positive impact of development on our environment



## Stage II: Exploring housing need and supply in the parish (2017)

- 2.14. The topic of housing had been raised early on in the process and the NPSG decided that it would be helpful to explore whether there was a local housing need and how this might be addressed. Based on examples from other parishes, in 2017 the NPSG developed a comprehensive Local Needs Survey, distributed to all households in the parish, to gather primary data on housing need now and in the future.
- 2.15. Just short of a quarter of all households in the parish responded, revealing a particular need for 1 and 2 bedroom dwellings, suited to both those starting <sup>1</sup> off on the housing ladder while also providing for those wishing to downsize. Affordability was also raised as an issue, perhaps not surprising given the attractive rural setting of Wheathampstead, good road connections and proximity to nearby larger settlements. Full details of the Local Housing Needs Survey, including the survey itself and the detailed findings, can be found in the WNP Housing Report that forms part of the evidence base.
- 2.16. Having identified a housing need, a Local Call for Sites was launched in late 2017 to gain a picture of how housing might be delivered locally. This brought forward 16 sites for consideration and a great deal of thought and effort was made by the NPSG to create a robust set of locally-specific criteria against which to assess the sites to determine their availability and suitability for development. The full detail of the Call for Sites process, the assessment criteria and the results of their application to the 16 sites is contained in the WNP Housing Report.
- 2.17. All of the sites stemming from the Local Call for Sites were located in the Green Belt. There had been a strong call from the local community to safeguard existing Green Belt where possible. Therefore the intention of the group was to not include sites at this stage, rather it would wait until the adoption of the Local Plan to set out the strategic housing growth and undertake an early review at that point. This was considered helpful in that the emerging Local Plan was anticipated to establish a strategic need to enable Neighbourhood Plans within the district to amend their Green Belt boundaries if needed, as set out in the National Planning Policy Framework (NPPF). This would enable the NPSG to explore this as an option for delivering against local housing need.
- 2.18. On 23 November 2020, however, following a much-delayed Examination, the emerging SADC Local Plan was withdrawn on the advice of the Inspector. The adopted St Albans



<sup>1</sup> [Para 136](#)

Local Plan Review 1994 does not establish this strategic need for minor Green Belt boundary changes, not least as it predates the NPPF as amended in 2019.

2.19. The NPSG, notwithstanding the aspiration to enable sustainable development to meet its local housing need, therefore decided not to progress site allocations within the WNP. It would however:

- commit to a review within six months of the adoption of the new Local Plan;
- seek to influence the emerging Local Plan in considering sites for allocation in Wheathampstead, employing the assessment criteria established by the Neighbourhood Plan Steering Group; and
- apply the policies of the Neighbourhood Plan, once made<sup>2</sup>, to planning applications as they arise, including development that is not considered inappropriate within the Green Belt.

### **Stage III: Developing and testing the emerging planning policies (2018 to 2019)**

2.20. The findings of the extensive set of community engagement events, business engagement and other one-to-one meetings were used to finalise the vision and objectives and the draft policies to deliver this. This resulted in the first Informal Draft of the WNP.

2.21. The Informal Draft was screened by SADC to determine the need for a Strategic Environmental Assessment and/or Habitats Regulations Assessment. The Determination Statement established that this would not be necessary.

2.22. It was also taken to consultation with the local community and SADC so that comments could be integrated before finalising into the Pre-Submission Version Plan. To assist this process, a summary leaflet (contained in Appendix A) about the Informal Draft Plan was distributed to all households in the parish and was made available at key locations locally and on the Council's website. Two responses had been received and were discussed, but of limited relevance to the NP.

2.23. The comments received from the informal engagement were used to finalise the draft Plan into its Pre-Submission (Regulation 14 version).

### **Stage IV: The Pre-Submission (Regulation 14) Draft Neighbourhood Plan**

2.24. The Steering Group finalised its Pre-Submission draft in late 2019, in readiness for the Regulation 14 consultation, which was held over an eight-week period from 24 February to 6 April 2020.

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<sup>2</sup> Or once passing Examination, while extraordinary Covid-19 measures are in place

- 2.25. The Plan and supporting evidence were uploaded onto the Parish Council website and the consultation was advertised to the local community: fliers were again delivered to all households; information was posted on the Facebook page; and articles were published in the Parish Newsletter and local press. Hard copies of the Plan were made available on request, and a series of public meetings were held to answer questions and receive feedback.

**Wheathampstead's Neighbourhood Plan**  
**Public Consultation (Regulation 14)**  
The Neighbourhood Planning (General) Regulations 2012 (as amended).

Comments are invited on Wheathampstead's draft Neighbourhood Plan.  
The Plan is available on the Parish Council's website – [www.wheathampstead-pc.gov.uk](http://www.wheathampstead-pc.gov.uk)

A copy of the Plan is also available at  
the Community Library, Marford Road, Wheathampstead AL4 8AY.

**The consultation runs from 9am February 24<sup>th</sup>, 2020 until 9am April 6<sup>th</sup>, 2020.**  
Please send your comments to [info@wheathampstead-pc.gov.uk](mailto:info@wheathampstead-pc.gov.uk) or write to  
The Clerk, Wheathampstead Parish Council, The Memorial Hall, Marford Road,  
Wheathampstead, AL4 8AY.

*Copy of notification included in the local press*

- 2.26. In addition to consulting with the local community, the NPSG wrote to a number of statutory consultees and other organisations having an interest in the Plan. A list of all the consultees written to is contained in Appendix B. Responses were received from the following:

- St Albans City and District Council
- Hertfordshire County Council
- Environment Agency
- Historic England
- Natural England
- Sport England
- Herts and Middlesex Wildlife Trust
- Strutt and Parker
- The Open Spaces Society
- Dartland Ltd (Owners of the Ayot Estate)

- 2.27. Finally, contact was made with the owners of the proposed Local Green Spaces to alert them to the inclusion of their land and the implication of this. To note, they had previously been contacted during the consultation on the Informal Draft Plan.

- 2.28. Comments received to Pre-Submission Consultations were recorded and made available for Steering Group members to read. The Comments were then assessed by Steering Group members and grouped by respondent and topic area. A detail of the comments and agreed NPSG responses to these is set out in Appendix C. The following

paragraphs provide a summary, by topic area, of the comments received during this process, where this has led to significant changes to the policies of the WNP or where they provide additional clarity.

- 2.29. **General comments:** The comments were largely supportive of the WNP and its policies. A number of text changes were made to provide additional clarity in places or to strengthen policy intentions.
- 2.30. The Hertfordshire County Council (HCC) Minerals and Waste Team provided information on mineral extraction sites within the parish. This was noted, however it was considered that no action was required as the WNP does not contain policies relating to waste and minerals, matters dealt with at the upper tier authority level.
- 2.31. **Section 3: Vision and strategic objectives (SO):** The comments received relating to the overarching vision and strategic objectives were supportive, with some minor textual changes recommended, for instance by SADC. The HCC Ecology team noted that they were pleased to see 'environment' included as part of the 'SAFE' golden thread principles. SO4 has been expanded to make it clear that it relates to the entire neighbourhood area.
- 2.32. **Section 4: Spatial Strategy and Housing:** Some comments were received about the relationship between the Neighbourhood Plan and the emerging Local Plan, particularly in light of the fact that the latter was experiencing difficulties at Examination. The WNP has to conform to the strategic policies adopted of the District Plan Review, and the intention had been also to synchronise with the policies of the emerging Local Plan, which had reached an advanced stage of the planning process. The withdrawal of the emerging Local Plan in November 2020, has led to the deletion of spatial and other policies relating to this document. In light of this, it is set out in Section 10 of the WNP that a review of the WNP would be undertaken on the adoption of the document to replace the current Local Plan.
- 2.33. No site allocations have been progressed in the WNP for a number of reasons: the fact that all sites coming forward were located in the Green Belt and the strong local desire to retain Green Belt; the fact Green Belt boundaries cannot be amended at the Neighbourhood Plan level without a strategic need expressed (the emerging Local Plan was anticipated to provide this but has been withdrawn. The adopted Local District Review does not set out this strategic need); the lack of strategic growth strategy at the district level; and the fact that sites for affordable housing (rural exception sites) could come forward without the need for an explicit site allocation policy. On this latter point, the work that has been undertaken in Sections 5 (Natural Environment) and 6 (Character and Conservation) are considered to provide sufficient guidance for any such schemes that might arise. A review of the WNP will be undertaken on the adoption of the new SADC Local Plan. This approach is considered as a response to queries raised by Strutt and Parker about whether the WNP could progress sites in the context of the emerging Local Plan having been withdrawn.
- 2.34. Policy W2 (Dwelling Mix) has been amended slightly on the advice of SADC, but the overall approach was supported.

- 2.35. **Section 5: Natural Environment:** This section attracted a number of comments from a range of stakeholders, generally very supportive of what the WNP is trying to achieve and offering advice on how the policies and supporting text might be strengthened.
- 2.36. In particular, helpful advice was received from the Herts and Middlesex Wildlife Trust Policy W4 (Conservation and enhancement of natural habitats and delivering biodiversity net gain) to strengthen the policy in respect of ensuring a measurable biodiversity net gain and how this should be measured. The policy and supporting text were amended accordingly.
- 2.37. SADC recommended additional justification text be provided for each of the views set out in Policy W7 (Locally significant views). This was undertaken, alongside maps in Appendix C showing a clearer arc, demonstrating the extent of each view and the area relating to the policy.
- 2.38. **Section 6: Character and Conservation:** Historic England in particular welcomed the WNP and its focus on local heritage assets. Policy W8 was amended to make more explicit reference to the Local Character Areas that have been identified as a result of the WNP engagement process, some of which are also considered to be non-designated heritage assets (NDHA). This is in addition to the list of individual buildings that have been identified as NDHAs, which are detailed fully in Appendix E of the WNP document.
- 2.39. It should be noted that following the Regulation 14 consultation, a great deal of effort was made to add additional information about why the NDHAs were considered to merit this title. Full descriptions have been developed alongside photographs and reasonings, bearing in mind the advice of Historic England<sup>3</sup>. Letters were sent to the owner (a copy is enclosed in Appendix D) of each of the proposed NDHAs. Responses received were:
- An email was received from a resident of The Folly, supporting its inclusion as a Local Character Area. This indicated that the topic had been discussed on the local Whatsapp page for the area, with support expressed there too.
  - One owner wished to have further clarification about what the NDHA meant for them as the owner of the building. This was provided and no further correspondence received.
  - One owner provided additional detail about their asset, to be added to the description.
  - Only one piece of correspondence was received from an owner<sup>4</sup> who was concerned about their building being considered as a NDHA as they did not consider sufficient reason had been provided. The Steering Group corresponded with the owner, providing a fuller description and reasoning, which has been mirrored in the Appendix E of the WNP. They also restated what is meant by an NDHA. The owner was invited to provide further feedback and, additionally, informed that there will be a further formal opportunity to comment on the Plan

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<sup>3</sup> <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>

<sup>4</sup> Further details can be provided to the Examiner but have not been included here for GDPR reasons.



at Regulation 16. No further correspondence has been received, therefore the asset has been retained in the Plan.

- 2.40. Policy W9 (Design of development) was also supported by the feedback received. Policy W11 (Attractive street scene) was expanded to include reference to both the SADC signage guidance and that produced by the Preservation Society for Wheathampstead.
- 2.41. **Section 7: Transport and Movement:** This section also received many comments, in particular supporting the emphasis on encouraging sustainable modes of transport. The Open Spaces Society comments provided some recommendations that were considered to add clarity to the policy and were therefore added. Policy W14 (Car parking in non-residential areas) was considered to be too promoting of movement by car by HCC and contrary to county transport policies seeking to move away from car parking provision. The NPSG discussed this at length. Availability of car parking was a key issue raised locally, which was felt to be unsurprising in the context of the rural nature of the parish and high levels of car ownership. One of the main features of this plan – encouraged by the SAFE framework - is to encourage sustainable transport. However there are practical considerations to be faced in the next 15 years, the scope of this plan, including the introduction of new personal transport technologies and improved public transport. It is considered that the WNP seeks to encourage a shift in travel modes and choices, but must also remain practical in what can be achieved and, in the meantime, ensuring that the community have access to the amenities they need. Therefore it was decided that this aspect of the policy should remain.
- 2.42. **Section 8: Community Facilities:** Again the policies in this section were largely supportive. Amendments to some of the policies included ensuring linkages between facilities and the footpath network. Sport England's comment led to a review of Policy W20 (Sports and recreational facilities), which was felt to improve the efficacy of the policy.
- 2.43. **Section 9: Local Economy:** A comment from Dartland on Policy W22 (Protection of Existing Employment Premises or Land) led to a discussion among the NPSG about what would constitute an appropriate length of time to market a property before a change of use should be considered. It was considered that 6 months, particularly in the current economic climate, would be a suitable time and the policy was amended from 12 months accordingly.

#### **Stage IV: Final Neighbourhood Plan submission**

- 2.44. Following the changes made to the Plan as a result of the Regulation 14 consultation, the Submission Version WNP was formally submitted to SADC. Assuming a favourable outcome, it will proceed to Examination and then to referendum.

### **3. Strategic Environmental Assessment and Habitats Regulation Assessment**

#### Strategic Environmental Assessment

- 3.1. The Plan, and the process under which it was made, conforms to the Strategic Environmental Assessment (SEA) Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 3.2. In accordance with Regulation 9 of the SEA Regulations 2004, SADC, as the responsible authority, determined in August 2019 that a Strategic Environmental Assessment (SEA) of the emerging Wheathampstead Neighbourhood Plan is not required as it is unlikely to have significant environmental effects.

#### Habitats Regulations Assessment (HRA)

- 3.3. Under Directive 92/43/EEC, also known as the Habitats Directive<sup>5</sup>, it must be ascertained whether the draft Plan is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulation Assessments ("HRA"). An appropriate assessment ("AA") is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.
- 3.4. SADC, as the responsible authority, determined in August 2019 that the WNP is unlikely to have significant impact on European sites and therefore the WNP does not require a full HRA to be undertaken.
- 3.5. In addition to conforming to its EU obligations, the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights.
- 3.6. The full Determination Statement is contained in Appendix A of the Basic Conditions Statement.

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<sup>5</sup> Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>

## **4. Conclusion**

- 4.1. The Steering Group has undertaken a very thorough engagement programme in order to develop its Neighbourhood Plan. It has set out a comprehensive vision and objectives. In developing the policies to achieve the vision and objectives, the Steering Group has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 4.2. Feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to SADC.
- 4.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012.
- 4.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Group and Working Groups as well as those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Neighbourhood Plan.

## APPENDIX A – Leaflet informing the community about the Informal Draft Plan

# Wheathampstead's Neighbourhood Plan 2019-2034



**What is in this booklet?**

**Important questions**

- \* Why is it important?
- \* Who wrote the Neighbourhood Plan?
- \* How will the Plan be used?
- \* How was the Plan developed?

**Key topics**

- \* Housing
- \* Natural environment
- \* Character and conservation
- \* Local transport and movement
- \* Community facilities
- \* Local economy

**Example policies**

- \* Policy W2: Dwelling Mix
- \* Policy W23: Encourage businesses to come to Wheathampstead

**Feedback and next steps**

- \* How to give feedback
- \* What happens next
- \* Contact information

### Please read the full plan and give feedback

You can find the full Plan on the Parish Council's web site by visiting [www.wheathampstead-pc.gov.uk/307-2](http://www.wheathampstead-pc.gov.uk/307-2)

There are also copies for you to refer to in the parish offices in both The Memorial Hall and the new library on Marford Road.

You are invited to comment on the Plan via email, verbal or written communication to the Parish Council - see contact details below.

### What are the next steps?

Once we have gathered your comments and made appropriate changes, we will present the plan to the independent inspector. The main purpose of the inspection is to ensure that the plan

- 1 Has regard to national planning policies;
- 2 is in general conformity with the strategic policies of SADC's Local Plan;
- 3 Is compatible with adjoining Neighbourhood Plans;
- 4 Contributes to the achievement of sustainable development.

Assuming the inspector recommends the Plan can proceed, the SADC will organise and pay for a referendum.

Once the Plan is adopted and is part of the planning process, it will be reviewed to ensure it is kept up to date.


### For more information contact:

Wheathampstead Parish Council  
The Memorial Hall, Marford Road, Wheathampstead, AL4 8AY  
Tel: 01582 832541  
[info@wheathampstead-pc.gov.uk](mailto:info@wheathampstead-pc.gov.uk)

The Parish Council Office is open from 9.30am to 12.30pm, Monday to Friday. If you wish to visit outside of these times, please contact us.

### Why is it important?

The graph below shows how Wheathampstead's population has grown to 6,500 since 1801 (solid blue line, left-hand scale) and the dotted line shows that, if the trend continues, it will grow to about 6,000 by 2034.



To make matters worse, the number of people who occupy a house or flat has reduced from an average of 6, to just over 2 today and this is likely to continue to fall beyond 2030 (orange lines, right-hand scale). So, not only do we need more houses and flats because of having more residents, but also because family units are smaller, and more people live on their own.

We must accept the reality of a growing population. The Neighbourhood Plan system exists to ensure that development in our civil parish is in the public interest, weighing up economic, environmental and social benefits and drawbacks.

### Who wrote the Neighbourhood Plan?

A steering group of Parish Councillors, residents and an external consultant has spent the last few years putting together the Plan and this is now ready to go to consultation both with our residents and with statutory bodies.

### How will the Plan be used?

Once the draft Plan has been screened and passed by the inspector, there will be a referendum as to whether it should be adopted as part of the planning system. If adopted by a simple majority vote, planning policies developed in the Plan are from then on part of St Albans District Council's (SADC) process when considering any planning application.

### How was the Plan developed?

We began by creating a vision of how Wheathampstead might develop in the next 15 years given our history and influences such as population growth and the environment. We also declared that Wheathampstead should be a SAFE community and this thread runs throughout the Plan.

**Sustainable:** Development and other activities conducted without depletion of natural resources.  
**Accessible:** Development meeting the needs of all users, such as cyclists, walkers, disabled etc.  
**Fair:** Development treats people equally without favouritism or discrimination.  
**Ecological:** Maximising the positive impact of development on our environment.

### What are the main topics underlying our policies?

From our vision we drew up nine strategic objectives, addressing issues such as building design and materials, public health, business, education, leisure and the environment.

We thereafter developed planning policies covering six main topics:

1. Housing
2. Natural environment
3. Character and conservation
4. Local transport and movement
5. Community facilities
6. Local economy

These policies are what give us some control over the planning process as they will be used in conjunction with policies developed by SADC as part of the wider Strategic Local Plan.

From our vision we drew up nine strategic objectives, addressing issues such as building design and materials, public health, business, education, leisure and the environment.

### Housing

We developed planning policies covering the six main topics. These policies are what give us some control over the planning process as they will be used in conjunction with policies developed by SADC as part of the wider Strategic Local Plan.

The steering group conducted a parish-wide survey on housing needs and concluded the main requirement is for smaller properties to accommodate first-time buyers and older residents wishing to downsize. The first housing policy addresses where development should take place - primarily within settlement boundaries. It also reinforces protection of the Green Belt.

The second policy addresses the mix of new development encouraging the building of 1 and 2 bed detached properties with an allocation of affordable housing.

### Natural environment

The natural environment is one of our greatest assets. The intention is therefore to minimise the environmental impact of development through five policies. The first policy says that new development must be appropriate to the character of our landscape and must maintain natural features such as hedgerows, ponds, hedges, etc.

The second policy looks at natural habitats while the third examines potential improvements to the flood risk corridor. The fourth policy offers protection to our 12 local green spaces and the fifth aims to protect locally significant views.

### Character and conservation

Wheathampstead has a distinctive character making it an attractive place to live and work. Policies have been developed to preserve and enhance our Conservation Areas and we have identified three Character Areas also worthy of protection.

Policies also address the quality of design including the use of appropriate building materials and the inclusion of sustainable design features. Maintaining an attractive village street scene is also covered in a separate policy.

### Local economy

The parish is home to over 200 businesses and these are important sources of employment as well as providing the High Street with customers. Local businesses also make a significant contribution to village life supporting local charities, village weekend and other projects such as the village platform and open spaces. Four policies are included which try to protect employment sites from being converted to other use, encourage new businesses to move to Wheathampstead and local more retail trade in the High Street.

### Local transport and movement

While the development of new highways is beyond the scope of the Neighbourhood Plan, we place emphasis on local access routes for pedestrians and buses identifying key walking and cycling routes and where they could be enhanced.

We also aim to protect and increase off-street parking wherever possible and to encourage improvements in the quality of public and community transport.

### Our community facilities

The area close to the Memorial Hall acts as the village hub for services including the doctors' surgery, the library and the station, and the services offered through the Parish Council. The Plan encourages the strengthening of this service hub.

Education provision is important and policies to enhance education delivery while minimising its impact on traffic flow is highlighted in a policy.

Medical provision and the protection of allotments, sports and recreational facilities are also covered in separate policies. The development of a heritage centre meeting a local museum is also actively supported.

### Example policies

**POLICY W2: DWELLING MIX**

This housing mix for development proposals must contribute to meeting identified housing needs of Wheathampstead parish.

Developments should seek to provide a mix of dwelling sizes based on the following distributions:

- 1 bed: 15-20% of all dwellings
- 2 bed: 40-45% of all dwellings
- 3 bed: 25-30% of all dwellings
- 4 bed: 5-10% of all dwellings

An alternative mix of housing will only be permitted where this is in line with up-to-date housing need and market demand as evidenced through the Strategic Housing Market Assessment.


**POLICY W23: ENCOURAGE BUSINESSES TO COME TO WHEATHAMPSTEAD**

A. Proposals for new business development, especially small scale flexible office units and affordable workshops, will be approved in appropriate locations subject to compliance with other relevant policies in this Plan and the St Albans City & District Local Plan.

B. This could be through either of the following:

- i. conversion of existing buildings across the Neighbourhood Plan area, subject to and subject to it being an appropriate use within the Green Belt (where applicable); or
- ii. provision of new buildings or conversion of existing buildings within the settlement boundary of Wheathampstead.

### Example map: Local green spaces



## Appendix B – Statutory consultees at Regulation 14

The following statutory consultees were contacted and invited to contribute to the Regulation 14 consultation:

<b>County and District Contacts</b>
St Albans District Council
Hertfordshire County Council
Welwyn Hatfield Borough Council

<b>Neighbouring Town / Parish Councils</b>
Harpenden Town Council
Hyde Parish Council
Kimpton Parish Council
Ayot St Lawrence Parish Council
Ayot St Peter Parish Council
Sandridge Parish Council
Hatfield Town Council

<b>Statutory Bodies and other interested parties</b>
Historic England
Environment Agency - Solent and South Downs
Highways Agency
Natural England
Network Rail
Homes England
Sport England
Herts and Middlesex Wildlife Trust
Herts Valleys Clinical Commissioning Group
EDF Energy - Infrastructure Planning South
Thames Water
UK Power Networks
National Grid
British Telecom



## APPENDIX C: Comments received from statutory consultees

Organisation	Comment	Response from Steering Group
<b>Herts and Middlesex Wildlife Trust</b>	1. Protecting natural habitats and species p31: The NPPF goes further than this in that it doesn't just seek to protect natural habitats and species, it requires measurable net gain. This applies to all habitats. All habitats have a value, but some are more valuable than others. The title of this section should reflect this. At the moment the title and the content appears to suggest that only priority or designated sites will be considered. This is not consistent with NPPF or indeed the immanent Environment Act which will mandate the use of the Defra biodiversity metric on all developments above householder. It makes sense that your NP is consistent with this national policy. So I would change this title to:  <b>Protecting natural habitats and species, and delivering measurable biodiversity net gain</b>	Change agreed and made
	2. Biodiversity net gain	
	The documents sets out how designated ecological sites will be protected, but it does not make it clear that all sites will need to demonstrate biodiversity net gain – as required by NPPF. I think you need another paragraph before 5.15 to make this clear.	Observation by consultee.
	<u>5.14 NPPF is clear that development must achieve a biodiversity net gain. Our biodiversity is not just located on designated sites. In fact most of our biodiversity is located and dependant on non-designated sites. All greenfield sites must demonstrate biodiversity net gain by utilising the Defra biodiversity metric (as amended).</u> <a href="http://publications.naturalengland.org.uk/publication/5850908674228224">http://publications.naturalengland.org.uk/publication/5850908674228224</a>	Modified Section 5 to take account of this suggestion.
	The reference to the Defra metric and the requirement for biodiversity net gain should then be spun through the rest of the document i.e.	Modified Section 5 to take account of this suggestion.

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	<p>5.15 Well-designed developments should properly establish the location of habitats and the movement patterns of animals and wildlife such that development does not impact on these. The creation of any habitat or species translocation should only be undertaken as a last resort when it is proven that a scheme cannot be designed to accommodate them in their existing location (including consideration of whether a reduced quantum of development would provide a solution). In order to reduce the impact of any such habitat creation or species translocation, this should be at an appropriate location as close to the existing site as possible, but not in a location that would damage existing habitats or species of value. Such locations should be identified in partnership with any appropriate wildlife body operating in the area.</p>	<p>No change required.</p>
	<p>5.16 The Defra biodiversity metric has been designed to determine and quantify existing biodiversity value, in terms of habitats, and the consequent measures required to ensure measurable net gain (<i>NPPF has been amended to require measurable net gain, not no net loss</i>). Net gain involves a post development increase in biodiversity units of 10%. Natural England (they created it) and the Herts and Middlesex Wildlife Trust consider this to be the most appropriate mechanism for determining current ecological value and delivering biodiversity net gain. Ecological assessment by suitably qualified people must utilise this metric on all habitats to determine net gain. Ecological reports must be consistent with BS 42020 Biodiversity – code of practise for planning and development.</p>	<p>Changes made as recommended.</p>
	<p>The clearer you make this requirement the less problems and disputes you will have down the line. The reference to BS 42020 is very important too because it allows you to refute poor ecological reports. Lots of ecological reports are very vague and make ‘recommendations’ or say what ‘could’ happen. These statements are misleading and worthless. BS 42020 demands that only definitive measures are proposed in ecological reports, so you know exactly what you are getting.</p>	<p>Observation by consultee.</p>
	<p>5.17 If significant harm resulting from a development cannot be avoided (by locating to an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.</p>	<p>No change required.</p>

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	<p>5.18 Planning permission should also be refused for any development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland, veteran trees, trees of a high conservation value located outside ancient woodland, <b>or ancient grassland</b>, unless the need for and benefits of the development in that location clearly outweigh the loss. In this instance substantial compensation as <b>quantified by the Defra biodiversity metric</b> will be <b>considered</b>.</p>	<p>Changes made as recommended.</p>
	<p>Strictly, development in irreplaceable habitats should always be refused. If it is absolutely necessary (as the HS2 argument went) then compensation must be substantial. The metric was absolutely not designed to consider the destruction of irreplaceable habitats, in fact it comes up with an error reading when these habitats are entered. So it should be very reluctantly stated as a basis for discussion rather than a baseline, to avoid accusation of 'a licence to trash'.</p>	<p>Observation by consultee.</p>
	<p><b>POLICY W4: CONSERVATION AND ENHANCEMENT OF NATURAL HABITATS AND DELIVERING BIODIVERSITY NET GAIN</b></p>	<p>Changes made as recommended.</p>
	<p>A. Proposals for development and other land use changes are required to demonstrate that where significant harm would result from such a development or other change, reasonable efforts have been made to avoid the harm, e.g. by redesigning or locating to an alternative site with less harmful impacts. This applies to harm to sites designated for their biodiversity value, e.g. Local Nature Reserve, Local Wildlife Site or Open Space (Figure 5.2), protected or <b>priority habitats and species</b> (these are defined under NERC 2006). Such proposals for development and other changes <b>must</b> be supported by a biodiversity appraisal, which must demonstrate how negative impacts would be minimised <b>and biodiversity net gain achieved</b>.</p>	<p>Changes made as recommended.</p>
	<p>I wouldn't mention Preliminary Ecological reports, they are generally of little value in determining planning applications because all they do is point out the need for more survey. Net gain is the requirement so all ecological reports should do this. This is their point, but often isn't what you get. Any reports that don't show a net gain can then be refused until they do.</p>	<p>Observation by consultee.</p>

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	B. The appraisal should demonstrate that where significant harm cannot be avoided, proposed development and other changes should adequately mitigate or, as a last resort, compensate for the harm. <b>The appraisal must demonstrate a measurable biodiversity net gain by utilising the Defra biodiversity metric.</b> Where <b>this is not demonstrated</b> , permission for planning or for the change should be refused.	Changes made as recommended.
	Again the point of an ecological report is to demonstrate a measurable net gain, so this should be specified by direct reference to the metric.	Observation by consultee.
	C. The appraisal should demonstrate that development and other changes should result in a clear and significant net gain to biodiversity <b>of 10%</b> . Net biodiversity impact should be determined by applying the <b>Defra biodiversity metric (or as amended)</b> . Ecological compensation may be delivered on or off site.	Changes made as recommended.
	You must specify the Defra metric. If you don't you invite spurious metrics to be used. Developers will reach for the one that gives them the best result. The metric must be standard to be fair.	Observation by consultee.
	D. Measures to achieve biodiversity net gain, mitigation or compensation involving the creation of habitat and/or relocation of species, must be agreed by the Local Planning Authority and include sufficient funding to support at least <b>30 years</b> of post-development habitat management or land use change.	Changes made as recommended.
	This is critical. The Environment Bill is specifying 30 years and it wouldn't be sensible to contradict this. Impacts on biodiversity are permanent so their compensation must also be permanent if net gain is to mean anything tangible. 30 years is considered the practical planning period for in perpetuity. In reality if a habitat has been managed appropriately for 30 years it will then become a priority habitat and then be protected by policy.	Observation by consultee.

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<b>Sport England</b>	Sport England provided a set of guidelines for the provision of sport facilities when developing a Neighbourhood Plan.	Replace whole of Policy W20 A. with: <i>A. Development that results in the loss of a sport, recreation or play facility will only be supported where it conforms fully with Sport England's Playing Fields Policy including all Exceptions. (Sport England, Playing Fields Policy and Guidance, March 2018). Added reference to List of Evidence Base Documents.</i>
<b>Natural England</b>	Natural England does not have any specific comments on this draft neighbourhood plan.	Noted.
<b>Strutt and Parker</b>	In summary:	
	We received a lengthy letter from Strutt and Parker (Taylor Wimpy Strategic Land) concerning the land at Hill Dyke Road. The land is the plot to the South-East of the village bordered by Beech Crescent, Hill Dyke Road, Dyke Lane and a line that runs approximately East-West.	
	The letter has five sections: Introduction, The Neighbourhood Plan Process, The Relationship between the Neighbourhood Plan and the Local Plan, The Site, Overview.	
	<b>The Introduction</b> section is a request for us to enter into discussions with them to consider the site as part of the Neighbourhood Plan. This follows its rejection by SADC as part of the Strategic Local Plan (SLP).	No change to the Plan. However, we are adding the site as if it was submitted as part of the "Call for Sites".
	In the <b>Neighbourhood Plan Process</b> section, they complain that we did not consult them on the site despite having written to the Parish Council (WPC) in 2016. They also complain that we did not adequately advertise the call for sites.	Observation



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	<p>The section on <b>The Relationship between the Neighbourhood Plan and the Local Plan</b> tries to establish that we should consider the site as part of our NP despite its rejection for the SLP. It points out that the existing, out of date plan has little value now and, in essence, all options can be considered. They argue that inevitably Wheathampstead will be required to provide additional housing despite being a Category 2 settlement, i.e. a large village currently protected from major development. They go on to make the point that In light of the above, they consider the emerging Neighbourhood Plan has an opportunity to allocate land for a proportionate level of growth in Wheathampstead that will ensure new housing and housing choice for those who need it, and will ensure the continued viability of social infrastructure within the village.</p>	<p>We are continuing to monitor the progress of the SLP so that our Neighbourhood Plan remains in alignment.</p>
	<p><b>The Site</b> amounts to 3.5 ha and this section provides arguments for its development including the provision of public green space. There are supporting documents showing the possible design of the site plus sustainability and deliverability surveys. The section also includes arguments as to why this development should be allowed in the Green Belt. Finally, the section lays out how this site conforms to six of our strategic objectives including the provision of housing for young residents and those wishing to downsize.</p>	
	<p>The final <b>Overview</b> section re-emphasises the positive contribution of the site to the NP.</p>	
<b>Open Spaces Society</b>	<p>This section needs careful consideration by the steering group with the need for an update from SADC on the developing SLP.</p>	
	<p>We welcome and support the emphasis on sustainable transport within this plan and the measures proposed for improving walking and cycling. We are however concerned that the wording of policy <b>W12: Primary local Access Routes</b>, may not result in the desired outcomes.</p>	<p>Observation by consultee.</p>
	<p><b>Firstly</b> the term “footway” has a specific legal meaning. In simple terms it applies only to a path which runs alongside a carriageway. It is commonly called the pavement. It does not apply to any other path. In addition it is only available to pedestrians as it is a criminal offence to cycle on a footway. This means that a requirement to “link up with a footway” in paragraph A of the policy has a very restricted meaning for pedestrians and limited benefits for cyclists who should dismount to cross the footway and join the carriageway. The word “footpath” has a much wider meaning.</p>	<p>Changed "footway" to "footpath" where appropriate</p>

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	<b>Secondly</b> not all roads are adopted and not all footpaths are public rights of way. The public has no right to walk or cycle along a private road and may not have the right to walk or cycle along a path which is not recorded on the Definitive Map and Statement as a “Public Right of Way”.	Observation by consultee.
	We suggest that the easiest way to remedy these deficiencies in the draft policy is to replace the phrase “link up with a footway” with the phrase “link up with an adopted footway or a public right of way”. It must be recognised that even with this change cyclists could be lead to a busy road with no separate cycle track but remedying this would require a more complicated modification.	Modified Policy W12 A
	<b>Thirdly</b> any development will be permanent. The access provisions need to be equally permanent. As landowners have the right to withdraw public access from any private path at any time without notice, this can only be guaranteed by requiring that any new routes provided as a result of policy W12A are to be dedicated as public rights of way.	Modified Policy W12 A
	<b>Finally</b> we suggest that this plan should include a policy to encourage the implementation of the measures proposed in Herts County Council’s Rights of Way Improvement Plan (ROWIP). The draft St Albans Local Plan contains several references to the ROWIP but it may be many years before this Local Plan comes into effect. The ROWIP already includes many proposals which would support the aims of this Neighbourhood Plan e.g. cycle paths to Harpenden and Sandridge, and it is likely that other proposals will be added during the timeframe of this Neighbourhood Plan. We suggest that wording along the following lines would be appropriate.	Added as Policy W12 D
	“Implementation of measures in the County Council’s Rights of Way Improvement Plan will be encouraged”	Added as Policy W12 D
<b>Dartland Ltd (Owners of the Ayot Estate)</b>	As a major landowner within the Parish, the Estate was disappointed not to be notified of the consultation process, especially as the Estate may be in a position to provide the Parish support and opportunities, in line with number of the policies identified in the plan. We would be grateful if you could ensure that all correspondence and consultations in the future will include the Estate, correspondence can be sent via Strutt & Parker at 15 London Road, St Albans, AL1 1LA.	Noted

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	The Estate has reviewed the Neighbourhood Plan and is generally supportive of the policies contained but would look to put forward the following comments:	
	<b>1) Section 1.13</b> – The Plan notes that it must be in ‘general conformity with the saved strategic policies of the adopted District Local Plan Review 1994’ and also to have reference to the emerging Local Plan. The Estate feels that this creates a conflict between policies that are some 26 years old and the policies of a plan where the Inspectors have cited ‘serious concerns in relation to legal compliance and soundness’. Therefore, whilst it is important that a plan is prepared to deal with the various issues that affect the Parish, it is questionable whether a plan should be finalised given the ongoing issues with the strategic local plan;	This is a timing issue and needs to be reviewed prior to submission to Regulation 16. We remain confident that continuing discussions with SADC we will be able to keep our plan in line with current thinking at District level.
	<b>2) Section 4.10</b> – The plan identifies the need for housing to fulfil the needs of the younger members of the village, to allow the older residents to downsize but also to provide the village with a better mix of housing sizes and types, but yet does not seek to allocate any sites for development. The Estate feels that this conclusion means that the plan is at odds with itself. It is felt that the Parish Council should seek to consider potential sites for development to achieve the plan objectives. This could be achieved by reviewing the site assessment process as it is felt that not all suitable sites were included or assessed;	This plan balances the need to keep the main settlement as a "village" with all the benefit that accrue for residents versus the need to provide a different housing profile. Inevitably older buildings, brownfield sites and some Green Belt will be developed and these policies are designed to encourage more appropriate accommodation when this occurs.
	<b>3) Policy W1</b> – Location of Development – The policy is broadly supported with the exception of B(iii). The policy notes that development will be supported outside of the settlement boundaries where ‘...the development brings redundant or vacant historic buildings back in to beneficial re-use’, but it is felt that this policy is overly limiting. The Neighbourhood Plan should consider to seek to support development where a change of use could provide for a more appropriate or more beneficial use than the existing use and not simply where the development brings a redundant/vacant building in to use;	Changed Policy W1 B(iii) and text

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	<b>4) Policy W22 – Protection of Existing Employment Premises or Land –</b> It is recognised that it is important to maintain employment opportunities/properties that can facilitate employment within the Parish. However, to suggest that a change of use will only be considered if 12 months of marketing of the property has been carried out, is excessive at the very least. There is no comparable requirement for this in the emerging Local Plan. The concern from the general public point of view, especially given the current economic situation, is the prospect of having commercial properties sitting empty for up to 12 months? The negative consequences of long term vacant properties are well documented and it is suggested that a more sensible approach would be for the owner of the property to work with SADC to consider the existing use and also the possible alternative uses that might be more beneficial for all.	Reduced to 6 months after further discussion. Changed text
<b>Strutt and Parker</b>	In summary:	
	The response is to promote a plot of land for the development of approximately 220 homes. The plot lies directly East of Long Buftlers and is bounded on the East by Pipers Lane opposite Pipers Farm. The response is in four sections: Introduction, The Site and Surrounding Area, Site's sustainability and deliverability for housing, Overview.	
	The site is 8.7 ha of grassland in the Green Belt. It has not been considered by SADC as part of it Strategic Housing Land Availability Allocation (SHLAA). The consultee wishes to discuss the site with the Parish Council for possible inclusion in the Neighbourhood Plan. The response also includes a discussion on why it could be developed despite being in the Green Belt.	No change to the Plan. However, we are adding the site as if it was submitted as part of the "Call for Sites".
<b>St Albans District Council</b>		
<b>Strategic Objectives</b>	<b>SO3:</b> - NPPF states local distinctiveness but that shouldn't preclude good modern design. Does it tie in to W8 E? Paragraph 6.10 again suggests only 'rural' designs ok which is different to W9. - This is really two separate points. Signage should be separated out.	Signage created as SO4. Other Strategic Objectives moved on a number and Conformity References renumbered.
	<b>SO4:</b> - This should be preserve or enhance. Concerned regarding included for the benefit of retailers as this may be used for arguments which put economic considerations above conservation when the weight to be applied is already set out in the NPPF etc.	New SO5 re-written as "To preserve and enhance Wheathampstead's historic buildings and conservation areas for future generations and to help draw visitors into the area for the

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		benefit of retailers."
<b>Policies</b>	<b>W1</b> - Use of 'or' - for example it appears development will be supported in Green Belt so long as it preserves or enhances the character or appearance of the area only.	Removed overuse of "or". It implied the Plan could allow development where Local Plan Policies would not. "and" inserted instead of "or" after B(i).
	<b>W1 (B)</b> - Is this criteria in addition to standard green belt criteria or instead? Location of development should not only be approved solely on the criteria that it preserves or enhances the character and appearance of the area.	By altering the use of "or" above, this issue is resolved as development in the Green Belt is covered by the SLP.
	<b>W1 (iii)</b> - Should include the clarifier that is consistent with their significance or similar. For example: 'where relevant, the development brings redundant or vacant historic buildings back into beneficial re-use, which is consistent with the conservation of their significance; or'	Modified using the phrase suggested.
	<b>W2</b> - There is no threshold – is this intended to apply even to relatively small sites of eg 10 homes?	Modified W2(B) to read "Developments of 10 dwellings or more should seek...". This allows the mix of dwellings to be achieved.
	<b>W2</b> - Does 'Local Connection' need to be defined? How would W2 D be 'policed'? Via S106?	Suggest: <i>"Priority must be given to the allocation of affordable housing to those with a local connection. Local connections shall include by birth, upbringing, family or personal residence of three years or more or local employment at the time of sale."</i>
	<b>W3 (A)</b> - What is the definition of 'cultural attributes'?	Changed text.



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	<b>W4 (A)</b> - Would this paragraph be best split into two Paragraphs?	Rewrite Policy W4
	<b>W5</b> - Does the 'Rive Lea Corridor' need to be defined?	For the pupose of this Plan the corridor is as defined by the River Lea Catchment Partnership (Upper Lea). <a href="http://www.riverleacatchment.org.uk">www.riverleacatchment.org.uk</a>
	<b>W7</b> - This would be a high test and in direct conflict with the intent of the policy as described in para 5.28. Potentially this could be changed to 'demonstrably detrimental' or similar?	Changed as suggested.
	<b>W7</b> - Does 'significantly detrimental impact' need to be defined?	Change, above, removes this issue.
	<b>W8</b> - Why does the policy state at E.	Changed to start at A
	<b>W8 (E)</b> - Development is expected to preserve or enhance the character and appearance of the Conservation area or Character Area in which it is located.	Changed "and" to "or".
	<b>W8 (F)ii</b> - This is a repeat of policy W7. The comments above apply.	Deleted F(ii)
	<b>W8 (F)iii</b> - Are you stating that character areas should be considered nonheritage assets? This would have NPPF application implications and would need to match the definition of a heritage assets in the NPPF glossary which we do not think all of the characters would meet.	The Local Character Areas have been highlighted 'zones' within the parish that have a special and distinctive character to them, features of which should be considered by any new development proposals. Changed text.
	This part of the policy is poorly worded. It could read instead: Development which affects heritage assets (including nondesignated (set out in Appendix D and E) heritage assets) either directly or indirectly, should respect the significance and context of the asset. Proposals should demonstrate how they will preserve or enhance any affected heritage assets.	Changed as recommended

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	There will be a presumption against the demolition of any structure listed in Appendix E. (this should be a separate criteria) – this needs to have a set of defensible reasons for this presumption which can be used in an assessment.	Created as new B(iii). New text.
	<b>W8 (F)iii</b> - Should be 'preserve or enhance'	Change made as part of 51, above.
	<b>W9</b> - There should be a colon before the list so it reads as such. We would suggest the list is re-worded to remove the 'it' at the beginning of each point as it is asking for demonstration, for example point one – how the development is guided by...	Change made as recommended. NB: (v) supports the HCC parking policy
	<b>W9 (iii)</b> - Is very stringent and is poorly worded. We think from the wording of the policy it is asking to make material choices contextualised. A better set of wording might be: How the development incorporates/responds to the local distinctiveness of its immediate surroundings, including the use of traditional building materials which are used in nearby existing buildings?	Changed as recommended
	<b>W9 (vi)</b> - What does 'visual intrusion' mean?	Removed "visual intrusion"
	<b>W9 (vi)</b> - Why has this policy changed from A- E and gone to roman numerals?	There is only one major policy in W9 that is qualified by the paragraphs itemised using Roman numerals.
	<b>W11</b> - 'Design Statement: Signage in the Parish of Wheathampstead produced in 2010 by Wheathampstead and District Preservation Society' is not an adopted planning document	Pending re writing of WDPS Document
	<b>W12 (A)</b> - Amend 'Should' within the first sentence to 'take opportunities to' instead. Very onerous otherwise.	No change
	<b>W19 (C)</b> - Amend to 'as part of any pre-submission...for all development proposals...'. Not all developments have to carry out community consultation, for example householders.	Changed as recommended
	<b>W21</b> - If want to say this, needs to say 'supported in principle' not simply 'supported'. This would prevent development which would otherwise be unacceptable.	Changed as recommended
	<b>W22</b> - Query is this what is intended - it refers to 'existing employment sites' and doesn't define particular areas, therefore appearing to apply to any existing site with an employment use.	Changed to "business premises (including retail)"
	<b>W24</b> - What is the intention of this policy? This could be too flexible and for example could result in the area solely consisting of A5 takeaways which we imagine is not the intention.	Changed to <i>"providing that it is of a scale that complements local provision of a mix of retail outlets and is compatible with the size and scale of the village centre."</i>

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	<b>W25</b> - How would this be implemented? Temporary permission if not already retail?	No change.
<b>Paragraphs</b>	<b>2.2.</b> - The third sentence should refer to it first as Hertfordshire Archive and Local Studies (HALS).	
	<b>2.11</b> - The Wheathampstead Conservation Area has 44 listed buildings and structures, including the grade I listed St Helens Church. According to Historic England there 64 designated heritage assets within 1km of the village centre, including the scheduled monument – so 63 listed buildings. Where these figures have come from?	Changed to: <i>"Overall there are approximately 120 Grade listed buildings within the parish.</i>
	<b>3.2 - Housing and Development:</b> The phrase ‘historic nature’ is really vague, potentially switching to historic character would be better language in line with the NPPF and acts.	Changed as recommended
	<b>3.2 - Heritage:</b> This needs to be re-worded for clarity. As per above, the phrase ‘historic nature’ is really vague, potentially switching to historic character would be better language in line with the NPPF and acts.	Changed as recommended
	<b>3.2</b> - As far as we are aware there is no heritage centre as of yet, this is pertinent to the comments below regarding the heritage centre section W21.	No change - this is part of our vision for Wheathampstead
	<b>5.6</b> - Expansion of woodland on the Symondshyde Ridge may have implications on the Scheduled Monument – Devils Dyke. Maybe this could be clarified in the text as the erosion of the scheduled monument should not be encouraged.	Changed to <i>"promote the expansion of woodland beyond ancient woodland boundaries, especially where this will help to create habitat links but not where it adversely impacts on historical assets such as Devil's Dyke;"</i>
	<b>5.8</b> - This would have quite substantial listed building setting and conservation implications. We think the aim is admirable but it should include discussion with the LPA for these reasons and potentially, as the manor house is grade I listed, Historic England.	5.8 simply supports the status quo and aren't identifiable policies.
	<b>5.28</b> - The phrase needs a better definition, instead of retain or improve these as it is then contradicted by the wording of the actual policy.	Added to policy W7: <i>"Development proposals that demonstratively improve locally significant views will be supported."</i>
	<b>5.28</b> - Either as a whole or each view should state what makes it special so it can be assessed whether or not development would preserves etc. The text included in Appendix C are not particularly sufficient. The photos included need to be more visible, larger and better co-ordinated with the map as they will need to be used as an evidence base and to state what these views are in	Replaced Appendix C with more detailed justification. Map redrawn.

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	2020.	
	<b>6.5</b> - There are 120 listed buildings and structures within the parish. The majority lie outside of the Wheathampstead conservation area.	Changed "majority" to "many"
	<b>6.5</b> - The second sentence is poorly worded. We would suggest instead: Listed buildings are buildings or structures which are considered to be of national 'special architectural or historic interest'. Listed buildings are designated nationally and are protected under the Planning (Listed Building and Conservation Areas) Act 1990.	Changed as recommended
	<b>6.5</b> - The last sentence should read: It is important that development preserves or enhances the setting of listed buildings and the character and appearance of the conservation area where appropriate.	Changed as recommended
	<b>6.7</b> - There will be a strong presumption against the loss of the buildings and monuments appearing on the list and developments which result in this will be refused.	No change
	<b>6.10</b> - Sympathetic to the built heritage - As discussed above the majority of listed buildings in the parish are not located in the Wheathampstead CA. We would suggest that it needs to be re-worded to say:	
	<i>'New developments within, or located in the setting of, designated heritage assets, should be compatible with existing architectural styles and materials ensuring that new build sits comfortably alongside existing developments. Some of these styles are illustrated in Figure 6.3.'</i>	Changed as recommended
	<b>6.10</b> - Use of typical local materials - The parish is quite large and character of local buildings varies throughout. What is considered local for Wheathampstead is not necessarily common for Gustard Wood etc. We think removing the specific materials mentioned. The examples in 6.3 only show those within the village centre of Wheathampstead. We would suggest that it needs to be re-worded to say:	
	<i>'Materials used in construction should reflect the existing built environment. The historic houses and cottages of the parish are built predominantly from local materials. The use of local building material has given a distinctive character to many of the buildings across the parish. Figure 6.3 shows examples of the use of local materials located within the Wheathampstead village core.'</i>	Changed as recommended

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	<b>6.15</b> - This should be used to discuss heritage assets, rather than singling out Conservation Areas – this would be important for listed buildings and potentially archaeology too – if considering ground source heat pumps.	Changed "Conservation Areas" to "heritage assets"
	<b>7.16</b> - This should read 'These should be off-road and minimise visual impact on the Conservation Area – off road parking if poorly considered can have a harmful impact on the conservation area'	Changed as recommended
<b>Other</b>	<b>12 Nonpolicy actions and spending priorities</b> - Character and Conservation – No evidence provided of need for an Article 4, which would be a lengthy process which the parish could not implement as it would need to be district led. SADC to consider this would need specific cases and examples of risk and erosion provided. None have been so this is not supported.	Revised text.
	<b>Glossary</b> - The definition of a conservation area is wrong and should be in line with the 1990 act.	Changed to match Historic England's definition: <i>"An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance."</i>
<b>Historic England</b>	We welcome the production of this neighbourhood plan, which we consider to contain a positive strategy for the conservation of the historic environment - including at a neighbourhood scale, through the inclusion of non-designated character areas and heritage assets amongst its considerations. In particular, Historic England welcomes Strategic Objective 4, although we would suggest that the wording of the objective is broadened slightly to include all areas within the Neighbourhood Area other than Wheathampstead only.	Changed SO4 to read: <i>"Signage in the parish will be controlled to prevent clutter and inappropriate use of lighting, materials and design."</i>

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	<p>We also strongly welcome policies W7 and W8. We would suggest that the wording of policy W7 is altered slightly to the following: <i>Development proposals <del>are required to ensure that they do not have a significantly</del> must avoid having a detrimental impact on the locally significant views listed in Figure 5.4 and indicated on the Policies Map (Section 13), with illustrated descriptions in Appendix C. Where an impact is unavoidable, its effects should be minimised, and mitigated where appropriate by high quality landscape design.</i> This wording, or similar, strengthens the requirement of the policy, and also places an obligation on any developer to include consideration of mitigation where appropriate.</p>	<p>Changed as recommended</p>
	<p>We would also suggest that the final sentence of Policy W8, iii is reworded to the following, in order to align more accurately with wording of paragraph 184the national planning policy framework: There will be a presumption in favour of the conservation of any structure listed in Appendix E.</p>	<p>Changed as recommended</p>
	<p>We are also pleased to see the inclusion of a strongly worded policy in favour of good design (W9). We would suggest that this policy include reference to and a requirement for any new developments to demonstrate how they have met, where appropriate, the principles of the CABE Building in Context Toolkit, which can be found here: <a href="http://www.building-in-context.org/the-bic-toolkit">www.building-in-context.org/the-bic-toolkit</a> . We would also suggest that the policies strong policies regarding vehicle movement and storage are backed up by a requirement to have regard to the governments best practice advice for road and street design, Manual for Streets 1 and 2. We would also suggest that reference could be made to Historic England's own 'Streets for All: Advice for Highway and Public Realm Works in Historic Places in policy W11.</p>	<p>Added to policy W8 - Character of Development: "<i>C. Development proposals should illustrate how the development complies with the eight <b>Building in Context</b> principles as developed by English Heritage , CABE and the Kent Architecture Centre (<a href="http://www.building-in-context.org">www.building-in-context.org</a>).</i>" Added to Policy W11 - Attractive Village Street Scene: (B) - "<i>Where appropriate, development should follow Historic England's Streets for All advice.</i>"</p>
	<p>For any further information, we would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>.</p>	<p>Noted.</p>
	<p>For further advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Hertfordshire County Council.</p>	<p>Observation</p>



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<b>Hertfordshire County Council</b>		
<b>SECTION 3: VISION AND OBJECTIVES</b>	<b>Vision for Wheathampstead (Transport)</b> - Highways & Transport. Due to its location, Wheathampstead benefits from being on the routes of several inter-urban bus services (366, 610, 304, 357). There are some gaps in the timetables of some of these routes, but combined frequency is adequate with best frequency to Harpenden (up to 3 per hour combined frequency weekdays), with accessibility to St Albans (via 304 and 357) and Hatfield (via 366 and 610). HCC's approach to the improvement of the bus network is set out in the Intalink Bus Strategy and associated Enhanced Partnership.	Observation
	<b>Strategic Objective SO6 - Highways &amp; Transport.</b> The county council supports SO6, as it clearly aligns with many of the policies within HCC's LTP4, and thereby further reinforces development proposals to be consistent with its objectives.	Observation
	<b>Strategic Objective SO8 - Ecology.</b> SO8 mentions maintaining biodiversity and implies enhancement, which is supported.	Observation
<b>SECTION 4: HOUSING</b>	<b>Policy W1: Location of Development (B iv) - Highways &amp; Transport.</b> It is considered that it would be beneficial to define utilities infrastructure to ensure that the definition considers public footways as a utility. In order to be sustainable a development shall need to be linked safely to the footway network, whilst it may be possible to link a development through off-site works at an applications expense the development would be expected to be within an acceptable walk distance via such route to local services.	Utilities services and infrastructure includes water supply, sewerage, drainage, gas, electricity, full fibre broadband, digital infrastructure and telephones. (as per definition included in the national design guide)
<b>SECTION 5: NATURAL ENVIRONMENT</b>	<b>Ecology.</b> Herts Ecology is pleased to see the 'golden thread' running through the neighbourhood plan through the delivery of Wheathampstead's SAFE objectives (Sustainable Accessible Fair and Ecological) Community, where ecological in this instance means maximising the positive impact of development on the NP environment.	Observation

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	The aspiration to achieve biodiversity net gain is covered in NPPF and has gained a lot of momentum recently, but it is not yet mandatory. The Defra Biodiversity Impact Calculator is one tool available to determine and quantify biodiversity value, however, Herts Ecology supports its use where applicable and appropriate.	Noted
	With regard to the wording in paragraph 5.17, suggesting an application be refused may be extreme and un-defendable at a Public Inquiry; therefore, consider adding the word 'normally' be refused or change to 'considered for refusal'. This approach should also be applied to paragraph 5.18.	Policy W4 rewritten.
	<b>Policy W4: Protection of Natural Habitats</b> - Ecology. This policy is broadly supported. However, with regard to paragraph B, add: "where appropriate" so that it now reads: "Where this cannot be achieved satisfactorily, then permission for planning or for the change should be refused where appropriate."	Policy W4 rewritten.
	<b>Policy W4: Protection of Natural Habitats</b> - Paragraph C within Policy W4 should also be amended as follows: "The appraisal should also demonstrate that development and other changes should result in a clear and significant net gain to biodiversity. Where appropriate, net biodiversity impact should be determined by applying a recognised biodiversity impact calculator. Ecological compensation may be delivered on or off site."	Policy W4 rewritten.
	<b>Policy W4: Protection of Natural Habitats</b> - It is uncertain where 10 years comes from re: securing supporting funding? However, it is widely accepted that biodiversity net gain secured through planning should be in perpetuity, which is considered to be 30-35 years. It is unreasonable to secure in perpetuity funding upfront.	Policy W4 rewritten.
	The wording within Policies W5, W6 and W7 are supported. Within paragraphs 5.13 and 5.14, there is mention of statutory or non-statutory nature sites (5.13, 5.14). For information, there are: Two statutory site(s): two Local Nature Reserves; 50 non-statutory Local Wildlife Site(s) (LWS): 41 are within the plan area, and 9 cross the parish boundary; 0 non-statutory Local Geological Site(s) / Regionally Important Geological Site(s) (RIGS); 13 non-statutory Ancient Woodland Inventory (AWI) sites; 11 are totally within the plan area and two cross the parish boundary.	Observation

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<b>SECTION 6: CHARACTER AND CONSERVATION</b>	Historic Environment. The plan does not include any policies which refer to the historic environment specifically. There are no policies which refer to archaeological remains, undesignated heritage assets, or the potential for as yet unknown heritage assets to be found. Historic landscapes are referred to, but only as part of ecological policies. Conservation of archaeological features may be strengthened if there are specific policies to do this. More importantly the Historic Environment Record (HER) does not appear to have been consulted, which not only is a basic requirement of the NPPF but also ensures the authors have sufficient information about the neighbourhood's historic environment when producing the plan.	Revised historical content and included new Policy W8 and Appendix F
	Should the plan wish to specifically conserve the historic environment in the neighbourhood, it should provide policies to do this and they should focus on heritage assets which make Wheathampstead locally distinctive.	Revised historical content and included new Policy W8 and Appendix F
	<b>Design of development (car parking) - Highways &amp; Transport.</b> A level of car parking that continues to encourage sustainable transport as an attractive option is supported. It may be useful to refer to HCC's design standards, as contained in the Roads in Hertfordshire design manual, to encourage compliance for any forthcoming developments.	Added: " <i>Car parking should comply with Hertfordshire County Council's design standards.</i> "
	<b>Design of development (well-connected developments) - Highways &amp; Transport.</b> To comply with the National Planning Policy Framework (NPPF), it is suggested that the wording be amended to include reference to congestion and capacity mitigation, as follows: " <i>Developments should include linkages to existing footpath and cycleway networks where available. They should not create such additional traffic as to impact negatively on road safety and where any significant impacts from the development in terms of capacity and congestion these are mitigated to an acceptable degree.</i> "	Changed as recommended
	<b>Policy W9: High Quality Design of Development (v) - Highways &amp; Transport.</b> It is suggested that reference is instead made to "those parking standards applied by the Local Planning Authority at the time of application" to allow for updated or amended standards without conflict with the neighbourhood plan.	Modified text.
	<b>Policy W10: Incorporating Sustainable Design Features (A.vii) - Highways &amp; Transport.</b> Clarification is needed on the meaning of small vehicles, as it is assumed that it refers to mobility scooters, powered 2 wheelers, and similar equipment. It is also considered that access to walking and cycling routes should be included within the policy.	Now reads: "...bicycles and other small vehicles such as mobility scooters, powered 2-wheelers, etc. without detriment ...". Access to walking and cycling routes is covered in Policies W9 and W12.

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	<p><b>Policy W10: Incorporating Sustainable Design Features (A.vii) - Minerals &amp; Waste Planning.</b> Policy W10 should consider incorporating the Waste Hierarchy. The EU Waste Framework Directive (WFD) applies a priority order to the management of waste, known as the Waste Hierarchy, which can be viewed here: <a href="https://ec.europa.eu/environment/waste/framework/">https://ec.europa.eu/environment/waste/framework/</a>. The Waste Hierarchy was transposed into UK law in 2011 and is embedded in the National Planning Policy for Waste, 2014.</p>	<p>Added: Policy W10, E. Building works must adhere to the Government's National Planning Policy for Waste, 2014.</p>
	<p><b>Attractive village street scene - Highways &amp; Transport.</b> HCC operate in accordance with national guidelines via a defect management approach, which prioritises those defects that may prove hazardous or obstructive to the travelling public. A like for like repair is not always possible under these programmes. Third party works are governed by legislation including the New Road and Street Works Act and accompanying codes of practice (primarily, the Specification for Reinstatement of Openings in Highways); there is no obligation for temporary repairs to make use of local or specific material.</p>	<p>The Neighbourhood Plan refers to new developments and not maintaining existing street furniture we therefore consider it unnecessary to make this change.</p>
	<p><b>Policy W11: Attractive Village Street Scene - Highways &amp; Transport.</b> With regard to paragraph 'B' the county council does not object to this statement, it must be stressed that for HCC (as Highways Authority) to consider roads for adoption the materials used must be accepted by the authority, which may constrain some selections. In reference to part 'C' bin stores should be within an acceptable distance from point of collection, nominally the highway.</p>	<p style="text-align: center;">Noted</p>
	<p><b>Policy W11: Attractive Village Street Scene - With regard to paragraph 'D'</b> It is important to ensure that off-street parking does not significantly increase provision and encourage car use., as this contravenes LTP4. If necessary, inappropriate on-street parking should be reduced or controlled rather than simply moved or expanded. HCC as Highways Authority does not support this currently as worded, as potentially providing additional parking is contrary to LTP4.</p>	<p>Modified to read: "<i>Development proposals that provide adequate off-street car parking for residents and visitors, in accordance with those parking standards applied by the Local Planning Authority at the time of application will be supported.</i>"</p>

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<b>SECTION 7: TRANSPORT AND MOVEMENT</b>	<b>Planning for sustainable transport - Highways &amp; Transport.</b> HCC currently has no standards or guidance for waymarking dementia friendly routes. Whilst we would have no objection and recognise and confirm the network should be safe for all users, this is worth noting.	Noted
	<b>Planning for sustainable transport</b> - The hierarchy of travel modes listed under paragraph 7.4 is not in line with that encapsulated in LTP4's Policy 1. Predominantly, there is no scope to encourage development that removes the need to travel.	No change. Paragraph 7.4 is broadly in line with LTP4's Policy 1 and is an illustration only - not a Policy. We agree that there is no scope to remove the need to travel in a development policy.
	<b>Planning for sustainable transport</b> - Whilst it is acknowledged that the hierarchy is intended as a simplistic overview of choices, it is not objectively true; minibuses, for example, are much less efficient on high volume routes and vehicle size is less impactful on emissions than engine size, age, and similar which may be independent of dimensions. The authority would not support this hierarchy.	We agree that the illustration in 7.4 is simplistic and is for illustration only. There is no definitive answer as it depends entirely on circumstances such as bus loading, age of engine, environmental cost of manufacturing, etc.
	<b>Proposed Cycleway Linkages - Highways &amp; Transport.</b> Limitations on Section 106 and CIL funding may prevent these measures, with the received funds needing to meet appropriate criteria including, but not limited to scale, scope, and proximity to the funding development. The county council does not object to the object to this approach but advise that this may not be practicable.	Noted
	<b>Proposed Cycleway Linkages</b> - With regard to paragraph 7.12, currently planning applications must demonstrate how the development will be linked into the wider foot/cycle network to allow access to key destinations and therefore encourage walking/cycling from the site. The precise routes however may vary depending on the site location.	Noted
	<b>Proposed Cycleway Linkages</b> - Where contributions are sought through Section 106 agreements for cycleway and footpath improvements, it is stressed that Section 106 agreements may not be suitable for all schemes, and alternative or supporting funding sources are highly variable.	Noted

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	<b>Policy W12: Primary Local Access Routes (C) - Highways &amp; Transport.</b> It should be notes that the county council's document: 'Roads in Hertfordshire' a hierarchy of provision. This does require cycleways to be provided segregated from traffic in certain situations, but not all. Footpaths should always be to an appropriate width throughout the length.	Noted
	<b>Improving cycle connections beyond the parish- Highways &amp; Transport.</b> Hertfordshire cycling infrastructure is predominantly delivered via the LCWIP (Local Cycling and Walking Infrastructure Plan) process. HCC would welcome a discussion with all stakeholders, including the parish, when this process begins for the Wheathampstead area.	Comment
	<b>Car Parking - Highways &amp; Transport.</b> Whilst the county council acknowledges and endorses the priority given to sustainable methods of transport, HCC suggests that placing Public Transport ahead of Car Parking in the plan would further support this stance.	Noted, text changed to address parking issues.
	<b>Car Parking</b> - With regard to providing sufficient car parking spaces in paragraph 7.16, this simply encourages car use and gives neither incentive nor drive to shift transport modes. A level of car parking that encourages active, sustainable travel would be supported.	Noted, text changed to address parking issues.
	<b>Car Parking</b> - It is suggested that proposals to place time restrictions on car parking spaces in the High Street, as suggested in paragraph 7.18 should be amended to allocate these spaces to essential car users only (for example, blue badge holders) and encourage others to visit the High St by sustainable modes. A plan to improve car parking is not in line with the approach of LTP4. New developments will need to demonstrate how the use of sustainable modes of transport will be encouraged from the site to mitigate the impact of the development through both physical measures and through travel plans for those developments that meet the criteria.	Noted, text modified - see Seq 116. One of the main features of this plan is to encourage sustainable transport. However there are practical considerations to be faced in the next 15 years, the scope of this plan, including the introduction of new personal transport technologies and improved public transport. Modify 7.18 to allow for the increase in sustainable transport: "...adjusting for the increase in electric and smaller vehicles, and cycles. "

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	<b>Policy W14: Off-Street Car Parking In Wheathampstead- Highways &amp; Transport.</b> The wording and intention behind the policy is not supported, as there is a presumption against the loss of publicly accessible off-street car parking, which contravenes LTP4. This undermines the sustainability agenda expressed in the neighbourhood plan.	Suggestion from HCC rejected. Instead a justification for existing version added.
	<b>Public transport - Highways &amp; Transport.</b> Funding for bus service improvements directly associated with a site comes from Section 106 agreements. Wider strategic transport needs can be funded through CIL. The focus of provision from specific developments is on service improvements where necessary to make the site sustainable, as well as infrastructure improvements such as bus priority and bus stop infrastructure. It is unlikely however that development will be able to fund all necessary infrastructure and other funding sources will need to be found.	Noted. Added reference to S106 along side of the reference to CIL.
	<b>Public Transport</b> - Section 106 funds towards community transport services can be requested where appropriate. For information on community transport services in the local area, please visit <a href="https://communitytransportherts.org/">https://communitytransportherts.org/</a> .	Noted
	<b>Policy W15: Bus and Community Transport Provision- Highways &amp; Transport.</b> Realistically, without significant development in the Wheathampstead area that generates significant developer contributions, improvements are likely to be focussed on smaller scale infrastructure schemes rather than services which are expensive to improve and cannot be funded from smaller developments. The Intalink Bus Strategy and Enhanced Partnership scheme and plan set out HCC's approach to the improvement of the bus network across the county.	Noted
<b>SECTION 8: COMMUNITY FACILITIES</b>	<b>Policy W18: Medical Provision - Highways &amp; Transport.</b> It is considered that the relocation of health facilities should also be accessible by walking and cycling, which is line with the requirements of the county council's adopted LTP4.	Added: <i>"iv. Any proposed site should be accessible by walking and cycling."</i>



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	<p><b>Policy W19: Allotments and Community Growing Spaces (B. iii) - Highways &amp; Transport.</b> walking and cycling should be added to the accessibility criteria within paragraph iii of section B, as this is in line with the requirements of the county council's adopted LTP4.</p> <p><b>Celebrating Wheathampstead's heritage - Historic Environment.</b> The county council supports the aspirations of paragraphs 8.27 and 8.28 to provide the neighbourhood with a heritage centre. It may be useful for the plan to link this with developer contributions and CIL. Also, specific funding by developers could be sought (e.g. section 106) to curate archaeological finds from sites with a high significance, which can be of local as well as national significance given, they may be displayed in a neighbourhood heritage centre. Any retention of archaeological finds locally should first be agreed with St Albans District Museums Service.</p>	<p>Added to B: <i>"iv. Any proposed site should be accessible by walking or cycling."</i></p> <p>Added paragraph 8.29: <i>"Funding for ongoing support of a heritage centre and further exploration, both archaeological and academic, of our rich heritage will be sought through CIL and S106 contributions."</i></p>
<b>SECTION 12: NON-POLICY ACTIONS AND SPENDING PRIORITIES</b>	<p><b>Highways &amp; Transport.</b> It is suggested that this section lists active travel options first, followed by public transport, and finally car parking/usage to further reflect the desired transport hierarchy. Detailed comments are listed in the table below.</p>	
<b>Possible actions identified in the neighbourhood plan</b>	<b>HCC Comments</b>	
'Explore options to deliver shortterm (e.g. 30 minute) car parking on the High Street and Station Road, to encourage those wishing to park for longer to use East Lane car	An approach that endorses and encourages sustainable travel options would be supported.	Noted - the overall thrust of the plan is to promote sustainable travel over the period of the plan recognising there will be a period of transition.

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park.'		
'Lobby for and support the installation of charging points suitable for cars, taxis, bikes and mobility scooters, both within local car parks and along streets where off-street parking is not possible.'	HCC would support the use of electric vehicles over the use of more polluting vehicles, however the overall approach should be to encourage the use of more sustainable modes of transport in line with the Transport User Hierarchy set out in LTP4. Use of E-bikes could be encouraged in this way and may be suitable for the village due to local topography. Local car parking standards are set by St Albans District Council.	Noted - see Seq 124
'Undertake a regular assessment of the use of local car parks and car parking spaces to monitor supply and demand. Address this, for instance through	The usage of electric vehicles would be supported to an extent – the approach should be to encourage fully sustainable travel options as defined in the transport user hierarchy. An increase in parking provision would not be supported.	Noted - see Seq 124 re transport policy. Modified second sentence to read: "Address this, for instance through the re-balancing of spaces for electric charging points, smaller parking spaces for smart vehicles, space for motorcycles etc."

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the provision of additional electric charging points, smaller parking spaces for smart vehicles, space for motorcycles etc.'		
'High Street on-road parking is not wide enough and could be widened.... Consider addressing as part of any resurfacing work along the High Street. Identify areas where cars are parking on the footway potentially blocking footway users – see if additional car parking is possible by reducing the footway to create parking bays – e.g. at the top of	Reducing available footpath widths to provide car parking would not be supported. Existing on street parking is best controlled, and if necessary removed, to further encourage sustainable transport options.	Remove first sentence. Modify second sentence in the Issue column. Remove "These two factors cause..." and replace with "This causes...". Remove the second paragraph in the Possible Action column

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Brewhouse Hill'		
Improvements required for the benefit of pedestrians and cyclists. Increase the separation of cars, pedestrians and cars where possible and make navigation easier for all users.	Cyclists should only be using footways where designated as a cycleway, for example a shared use foot-/cycleway. Current design guidance (Roads in Hertfordshire, Manual for Streets) encourages the design of highways to encourage use of sustainable modes. Highway design also needs to reflect the place and movement function of road in question.	Noted
Promote cycling (both pedal and electric) as a sustainable form of transport for work, school and leisure.	This is supported. Schools are encouraged, and some developments required, to develop travel plans which include measures to promote cycling	Noted
'Undertake an assessment of cycle usage to identify to the	The relationship with such points is reciprocal and should influence and increase rather than simply be shaped by existing usage.	Noted

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best places to install cycle racks and, ideally, electric charging points.'		
'Explore options for improvements including a point to point bus route/timetable specifically for Wheathampstead to St Albans (and similarly Harpenden, Hatfield etc.) with photographs of the bus stop and points along the route making it easy to follow.'	Journey planning is provided through some websites and may need to be undertaken through local community groups. Those with a high level of need may be better suited to community transport initiatives.	Noted
'Explore potential changes to existing road layouts with a first step being to undertake further research into traffic flows, trip origins and destinations, and the impact of	This is not a public transport initiative, and the wording should be amended for clarity. HCC transport policy is set out in LTP4 and areabased schemes within the South Central GTP. The HCC approach to tackling congestion is to promote the use of sustainable modes. Changes to road layouts may be considered where there is a safety issue or in order to facilitate and encourage use of sustainable modes.	Suggest: <i>As a local initiative</i> , explore potential changes to existing road layouts with a first step being to undertake further research into traffic flows, trip origins and destinations, and the impact of these on the roads in the parish, to understand what solutions there might be to tackle congestion and the cost implications. <i>Present findings to HCC for consideration.</i>

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these on the roads in the parish, to understand what solutions there might be to tackle congestion and the cost implications.'		
'Work with partners to identify whether there is a demand for a community shuttle bus and potential funding sources, drawing on existing examples of good practice'	A settlement the size of Wheathampstead is unlikely to support anything of scale and it would be better to promote existing bus and community transport options. The Harpenden Hopper is a local initiative for Harpenden which is a larger settlement, but struggles for patronage, and has had breaks in provision.	Noted - However public transport is critical to sustainable transport and cannot be ignored. Any local initiative should be welcomed and not discouraged.

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<p>‘Explore options to enable more onstreet car parking in the High Street by maximising spaces including reviewing need for existing number of disabled spaces.’</p>	<p>An increase in on street-car parking (especially free car parking) would not be supported and is contrary to LTP4. However, parking charging could be more acceptable. The county council would also support a review of the disabled spaces to ensure they are correct in number and placement.</p>	<p>Apply wording provided by HCC: <i>"Ensuring that the available parking provision in the High Street provides for those with a need to travel without encouraging additional vehicle journeys should remain a priority. It is recognised that businesses along the High Street see a high value in passing motor trade and it is not desirous to disrupt trade. The focus should be on ensuring that the right sort of users are catered for via appropriate bays, access points, and restrictions – such as time limitation or disabled parking."</i></p>
<p><b>Other General Comments</b></p>	<p><b>Community Protection (Hertfordshire Fire &amp; Rescue Services)</b> - Herts Fire &amp; Rescue Service does not have any specific comments relating to the policies and content of the neighbourhood plan. The service reserves the right to seek planning obligation contributions towards fire and rescue services via Section 106 agreements where necessary.</p>	<p>Noted</p>



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	<b>Community Protection (Hertfordshire Fire &amp; Rescue Services)</b> - The service requests to be consulted on requirements for the provision of water supplies, e.g. suitable and sufficient water mains and hydrants, and recommend the greater inclusion of Automatic Water Suppression Systems (AWSS) in the built environment. Sprinklers save lives, protect property, reduce the impact of fire on the environment and support UK businesses by reducing interruption.	Noted
<b>Minerals and Waste Planning</b>	The neighbourhood plan area is located within the sand and gravel belt where there is potential for the extraction of sand and gravel. This is shown as a Mineral Consultation Area within the county council's adopted Mineral Consultation Areas, Supplementary Planning Document, 2008. This is an area of the county where particular care is needed to prevent the unnecessary sterilisation of sand and gravel resources. In these areas, before planning applications are decided by the local planning authority, the county council will be given the chance to consider whether the development proposed would lead to unacceptable sterilisation of mineral resources. Minerals Policy 5: Sterilisation, of the adopted Minerals Local Plan 2002-2016 addresses the need for prior extraction of minerals to ensure that the resource is not sterilised.	Noted
	With regards to waste matters, the plan area cover a few existing safeguarded sites and operational waste sites identified in the Waste Local Plan (Waste Site Allocation document, July 2014). These sites include:  <ul style="list-style-type: none"> <li>• Sewage Treatment for Waste Harpenden (A) (east) (this site is in operation),</li> <li>• Sewage Treatment Waste Harpenden (D) (this is a safeguard area SA133),</li> <li>• Sewage Treatment Waste Wheathampstead (this site is in operation).</li> </ul>	Noted
	The plan area is cover by several historic/extant county matter planning applications for minerals and waste development. These are set out in table 1 below:	Noted

**Appendix D – Copy of letter sent to owners of proposed Non Designated Heritage Assets**

