

St Stephen Neighbourhood Plan
Responses to Independent Examiner's Clarification Note
Prepared by the St Stephen Neighbourhood Plan Steering Group
20 December 2021

Examination Ref: 01/AF/SSNP

20 December 2021

Dear Mr Freeman

ST STEPHEN PARISH NEIGHBOURHOOD PLAN EXAMINATION

This note has been prepared by the Steering Group (SG) for the St Stephen Neighbourhood Plan, on behalf of St Stephen Parish Council. We are grateful for the opportunity to provide further clarification on the points raised below.

Questions for St Stephen Parish Council and St Albans City and District Council

1. A revised version of the National Planning Policy Framework was published by the government on 20 July 2021 alongside a final version of the National Model Design Code. Please advise whether you consider any modifications in relation to the non-strategic matters covered by the draft St Stephen Parish Neighbourhood Plan are necessary as a result of the publications (other than amended referencing) and, if so, what these are?

We do not consider that modifications, beyond updating references, are required. We do, however, note that the revised NPPF strengthens some of our policy areas, including:

- Policy S5 – the renewed emphasis on the importance of local people having an involvement in setting local design guidance, in the context of the National Model Design Code.
- Policy S5, Policy S6, Policy S7, Policy S9 – the importance of trees and their protection, including their contribution to mitigating climate change

Questions for St Albans City and District Council

2. Does the City and District Council have any comments on the Neighbourhood Plan?
3. Policy S13: Does the City and District Council have a Community Infrastructure Levy scheme that covers contributions to community bus services/improvements to public transport infrastructure?

Questions for St Stephen Parish Council

4. Policy S1 – Is Paragraph 1 needed (in addition to Paragraph 2)?

It is agreed that the paragraph 1 is not required and can be removed.

5. Policy S1 - Paragraph following Paragraph 3 (incorrectly numbered 1): Does this paragraph relate to *residential* development? If not, how is the additional provision to be secured? "Additional provision": Provision additional to what?

It is confirmed that this paragraph relates to residential development.

6. Policy S1 – Paragraph 3 i: What is the predecessor to the St Albans District Local Plan?

This is a typo and should read 'successor' not 'predecessor'.

7. Policy S1 - Paragraph 4: How will an applicant know what are deemed to be visually intrusive locations?

This refers to locations in the immediate vicinity, and those visible from publicly accessible locations.

8. Policy S2 – predominantly 1, 2 and 3-bedroom properties: Is a mix of properties required? In what proportions?

The purpose of the policy is to seek to ensure that additional smaller properties (in terms of numbers of bedrooms) are prioritised, to address the shortage of such properties in the area – this shortage has been evidenced in the Local Housing Needs Assessment prepared to support the neighbourhood plan. The concern is that the lack of such properties impacts in particular on those wishing to downsize and those who are starting out on the housing ladder. Whilst it is considered too prescriptive to suggest percentages for each type of dwelling on a given site, a mix of such sizes would be optimal. The policy does not preclude larger (in terms of number of bedrooms) homes, but supports in particular the delivery of smaller (number of bedroom) properties.

9. Policy S2: Please comment on the representations of M Scott Properties Ltd in relation to the demand for 4-bedroom dwellings.

As worded, the policy does not preclude the delivery of 4 and 4+ bedroom dwellings. The purpose of the neighbourhood plan, however, is to consider locally specific policies and the evidence prepared to support the plan, as detailed in Q8, demonstrates a shortage of homes with smaller numbers of bedrooms. The policy therefore supports proposals that will assist in tackling this imbalance.

10. Policy S2 – supporting affordable housing for those with a local connection: As expressed, is this a land-use planning matter? How is this going to be achieved?

Whilst it is understood that the allocation of affordable housing is generally dealt with outside the planning system, the introduction of First Homes (introduced after the St Stephen Plan going to Regulation 16), does offer the ability to prioritise those with a local connection (among other groups such as key workers) to access First Homes. It is considered that the inclusion of 'First Homes' in the policy clause would enable this clause to be retained.

11. Policy S4 – non-listed assets within St Stephen's Parish Church: Please provide a related link to the Historic Environment Record. Is there clarity over which assets are included and covered by the policy?

Within St Stephen Parish, there are:

- i. nationally listed heritage assets
- ii. locally listed heritage assets

- iii. heritage assets which are neither nationally listed nor locally listed but appear on the Historic Environment Record – details can be found online in the Heritage Gateway: www.heritagegateway.org.uk/gateway/
- iv. two heritage assets – The Parish Barn, and St Luke’s Church - which are neither nationally listed nor locally listed and also do not appear on the Historic Environment but are considered important locally. Detail on why these are considered historically important are included in Appendix B of the NP.

The first part of the policy first seeks to identify (formally) assets (iii) and (iv) above as non-designated heritage assets. The second part of the policy then relates to all the assets – designated and non-designated - seeking to ensure that proposals affecting them are accompanied by a heritage statement.

12. Policy S5 - St Albans open space provision and Hertfordshire County Council’s Planning Obligations Guidance: Please provide links.

- St Albans Green Space provision – quality and quantity standards can be found in the Detailed Local Plan Technical Report Green Spaces (May 2016): https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/SP_GreenSpacesTechnicalReportPublicationDraft111016_tcm15-56020.pdf
- Hertfordshire County Council’s Planning Obligations Guidance: <https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/planning/developer-infrastructure-contributions-guide/guide-to-developer-infrastructure-contributions.pdf>

13. Policy S5 - accommodating grey water recycling and rainwater harvesting: Should this be tied necessarily to the building of basements rather than as a stand-alone objective?

Following a discussion, the Steering Group consider that this does not to be tied to the building of basements and should be a standalone objective.

14. Policy S5 - Para 3 ii) and v): Please comment on the representations of Hertfordshire County Council.

“Part 3, Paragraph ii: the text should be elaborated further, as it is unclear how the plan is quantifying high quality and thermally efficient materials. Will the plan also provide a minimum thermal efficiency rating?”

It is anticipated that development (for residential) should be in accordance with the Future Homes Standard.

“Part 3, Paragraph v: the text should also be elaborated, as it is unclear how the plan is quantifying low embedded carbon materials. Will the plan provide a list of sustainable efficient materials that can be used?”

Additional information within the supporting text could be added to provide further detail on the benefits of using materials that have low embodied carbon and how it might be achieved, for instance:

Embodied carbon means all the CO₂ emitted in producing materials. It's estimated from the energy used to extract and transport raw materials as well as emissions from manufacturing processes. The embodied carbon of a building can include all the emissions from the construction materials, the building process, all the fixtures and fittings inside as well as from deconstructing and disposing of it at the end of its lifetime.

Ways to reduce embodied carbon includes:

- using construction products that are made from locally available raw materials, through energy efficient and low emission processes and by manufacturers local to the construction site.
- Transporting materials with low carbon vehicles.
- Designing the construction process to minimise waste and reuse or recycle products where possible.
- Using systems and products that have long life spans.
- Designing the building to be able to change its use over time to minimise future refurbishments

(taken from [UCL Factsheet](#))

15. Policy S5: Please comment on the representations of Pegasus on behalf of Bloor Homes and the Department of Health and Social Care.

The representation is helpful and in line with the Steering Group's response to Question 14 above.

16. Policy S6 - objectives of the Watling Chase Community Forest Plan and the Charter for Trees, Woods and People: Please provide links.

Watling Chase objectives:

https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/SP_SPG---Watling-Chase_tcm15-60869.pdf

Charter for Trees, Woods and People: <https://treecharter.uk/>

17. Policy S6 – wildlife corridors and buffer zones: Please provide a link to Environment Agency recommendations.

<https://www.gov.uk/guidance/owning-a-watercourse>

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewidhOCM3fLOAhUGAcAKHcJ0A4sQFnoECAMQAQ&url=https%3A%2F%2Fwww.oxford.gov.uk%2Fdownload%2Fdownloads%2Fid%2F1662%2Fdevelopment_near_watercourse_or_floodplain_guidance.pdf&usg=AOvVaw02YxbclpwhMrz2aZhkRAmQ (The page linked to currently in the NP document appears to have been removed).

18. Policy S7: Where should applicants look to find details of Local Wildlife Sites?

<https://data.gov.uk/localwildlifesites>

<https://www.wildlifetrusts.org>

<https://www.hertswildlifetrust.org.uk>

19. Policy S8: Please identify those sites that are within the Green Belt. Please point me to the evidence of any additional local benefit (over and above Green Belt protection) that would be gained by designation as Local Green Space.

None of the sites proposed for designation as a Local Green Space are within the Green Belt. Appendix C does include a list of sites that are considered to be demonstrably special and within the Green Belt – these are not however proposed for designation at this time, rather it is considered that should a review of the Green Belt be undertaken, these sites should be reviewed as Local Green Spaces (if they are to be removed from Green Belt).

20. Policy S9: The Policies Map does not show a river corridor with well-defined boundaries. Is the river corridor to be taken as including a strip of land 8m wide adjacent to the river?

Where practical, yes.

21. Policy S9: Will an environmental impact statement be required for *all* developments?

It is considered that it may not be essential for land that is being redeveloped, however the redevelopment of brownfield land can have an environmental impact, as advised by Natural England.

22. Policy S9: For qualifying developments, is it proportionate to require a long-term landscape and ecological management plan for the river (the *whole* of the river)?

This is considered an unintended consequence of the current wording, which implies the ‘whole’ river. This could be amended to refer to only that part of the river within/adjacent to the development.

23. Policy S11: Having regard to the representations of Pegasus on behalf of Bloor Homes and the Department of Health and Social Care, are there any modifications that you would wish to make?

The response is noted, and it is acknowledged that the developer would seek to work positively on this pinchpoint issue.

24. Policy S14: Recommendations in Hertfordshire County Council’s Rights of Way Improvement Plan (part 10) for St Stephen Parish: Please respond to the representations of The Ramblers and provide an appropriate link.

The Steering Group are content with this suggested amendment. In terms of a link to the proposed report, having spoke to the Ramblers Association, it is the case that there is no public link to the recommendations. Rather it would be necessary to approach Herts County Council Rights of Way Team (Richard Cuthbert) to request the relevant mapping an excel spreadsheet extract relating to the Parish.

25. Policy S16: Has an inventory of “existing community facilities” been prepared?

Yes, this appears in one of the evidence base documents prepared for the Plan and is attached alongside this letter for ease.

26. Policy S16: What would constitute “other suitable employment or service trade uses”?

On reflection, the Steering Group would be minded to remove this statement.

27. Policy S21: What is envisaged under the description “appropriate mitigation”?

For example, enhanced landscaping or increasing biodiversity.

We are grateful for the opportunity to provide further clarification on this questions and points.

Yours sincerely

Cllr Bill Pryce

Chair of the Neighbourhood Plan Steering Group