

Sandridge Neighbourhood Plan

Summary of Regulation 16 Representations

Person or Organisation	Ref	Summary
Hertfordshire Gardens Trust	SNP1	<p>This NP acknowledges heritage assets but does not include historic designed parks and gardens. There are no nationally registered parks and gardens within the parish but part of Oaklands lies within the area. Hertfordshire Gardens Trust has included that in their list of Locally Important Heritage Landscapes which was prepared with the support of English Heritage (now Historic England). Our Register entry is attached.</p> <p>We suggest this is added to the heritage assets under 4.18.</p> <p>Policy D1 suggests that curtilage land could be used for infilling of small housing developments. This land should not be considered for development if it forms part of the setting (e.g. a garden) of a heritage asset (e.g. listed building). This would cause harm to the Significance of a heritage asset contrary to NPPF.</p>
Mr Nigel Gale	SNP2	<ol style="list-style-type: none">1. The plan addresses the area in the Sandridge parish as at 2014. The Local Government Boundary Commission for England review report (February 2020) currently out for extended consultation, makes proposals affecting the Sandridge parish boundary. The Plan needs to say how it will respond to those proposals.2. Policy D3 in the plan says that affordable housing will be offered first to people with 'strong local connections to the Parish'. This policy will conflict with the St Albans district Plan under which such housing is to be allocated to people with connections to St Albans – not connections to sub-localities of St Albans. People from Sandridge could expect to be treated as having a St Albans connection, when seeking affordable accommodation in other parts of St Albans (as well as in Sandridge), whereas people in all other parts of St Albans could be denied eligibility in Sandridge, if this Neighbourhood Plan proposal proceeds. The Plan needs to state how such an anomalous and inequitable consequence would be avoided. Which plan policy would dominate? Could a non-Sandridge family's priority need be trumped by that of a less needy Sandridge family?

		<p>3. Were other Neighbourhood Plans to establish similar ‘us first’ policies for their parts of the St Albans District, how would district-wide housing authorities square the circles to ensure fair and non-discriminatory treatment?</p> <p>4. Would people successful in being allocated affordable housing in Sandridge be allowed subsequently to move to similar housing elsewhere in St Albans, if available, whereas those outside Sandridge would not be allowed to move to Sandridge?</p> <p>5. Having generated an ‘us first’ policy, the Plan needs to demonstrate that the consequences have been fully thought through, in a way that the current proposed Plan does not.</p> <p><i>I have ignored the central government new planning structures, offered for consultation in the last few days, but they will obviously impact on all District and Neighbourhood Plans, eventually, probably necessitating a near-total rewrite in the new planning terms of art now proposed. Whether there is any point in proceeding with the Sandridge Plan as currently composed, is for others to gauge.</i></p>
Mr James Burstow	SNP4	This is an excellent plan which I fully support. With the Government changes to the planning process, Plans of this nature are even more important in order to preserve and enhance the natural and built environment.
Transport for London (TfL)	SNP5	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft Sandridge Neighbourhood Plan
Sports England	SNP6	<p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area.</p>

		<p>Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p>
Michael Beckett	SNP7	<p>I personally am all in favour of the Plan for more Houses in the North of St. Albans.</p> <p>My son and many of his school friends are now not living in St. Albans because of the price of St. Albans houses.</p> <p>The quicker that the Council pull out its finger and pass the Planning the better it will be for St Albans.</p>
Eve	SNP8	I agree it is important to get the plan in place particularly so that the District councillors have a mandate

Richardson		that they can/ should use.
Natural England	SNP9	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this neighbourhood plan.</p>
Affinity Water	SNP10	<p>If there are any proposed locations please see the message from my Hydraulic Modelling colleague below and we can provide a more focused assessment.</p> <p>To do the assessment, there are three key factors we analyse when reviewing the proposed sites and number of homes. Firstly, if any of the sites are within a groundwater Source Protection Zone (SPZ); secondly, the location of any existing water network or other interests in the proposed area; and finally, is the current infrastructure sufficient.</p> <p>We will need the sites being filled in the format of the shapefile attached "Sample.zip" (use it as a template to create the shapefile with all the sites planned filling the proposed fields).</p> <p>This will give us consistency with data received and the assessment provided to the local authorities, which it is very important to keep track for future developments, local plans etc.</p> <p>Once we have the Shapefile in the right format it should take about 3 weeks to give an answer.</p> <p>Please, if you have any question do not hesitate to contact me</p>
National Grid	SNP11	An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipeline. National Grid has identified that there is no record of such assets with the neighbourhood area.
Historic	SNP12	We welcome the production of this neighbourhood plan, but do not wish to provide detailed comments

England		<p>at this time. We would refer you for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:</p> <p>https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p>
Highways England	SNP13	<p>Thank you for your e-mail of 27 July 2020 inviting Highways England to comment on the above consultation and indicating that a response was required by 21 September 2020.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. The SRN does not route through Sandridge Parish. The nearest SRN to Sandridge Parish are the M25, M1 and A1(M).</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and local planning policies. Accordingly, the Neighbourhood Plan for the parish of Sandridge is required to be in conformity with the emerging St Albans City and District Local Plan 2020-2036 and this is acknowledged within the document. The Regulation 19 consultation Publication Draft St Albans City and District Local Plan 2019-2036 document gives a housing target for the District at 14,608 at an overall average of 913 homes per year. The broad locations for development do not include any locations in Sandridge Parish. Sandridge is listed in Policy S1 as a Green Belt Settlement where development will be limited to small scale infilling and redevelopment of previously developed land.</p> <p>We welcome Policy T1 of the Neighbourhood Plan which recommends that major developments (of 10 dwellings or more) provide a traffic assessment and mitigation where required. We also note that the Neighbourhood Plan does not allocate any housing development sites and no housing target is established for Sandridge Parish. Considering the limited level of growth proposed across the Neighbourhood Plan area, we do not expect that there will be any impacts on the operation of the SRN</p>
Ramblers	SNP14	Policy D4 – Housing Development – Less than 10 dwellings. We strongly support item 10:

Association	<p>"Prioritise pedestrian access where possible – with reference to the Rights of Way Improvement Plan"</p> <p>Policy D5 – Housing Development – More than 10 dwellings. We strongly support item 2 "Pedestrian and cycle access....."</p> <p>Policy D7 - East St Albans Broad Location. We strongly support:</p> <ul style="list-style-type: none"> - Item 5 – "Provide safe access for pedestrians....." - Item 7b – "Sustainable transport enhancements....." <p>Paragraph 5.37, 5.38 and 5.39. We strongly support those measures in these paragraphs which will improve safety and provide new car free routes for pedestrians.</p> <p>We have serious concerns about the impact on North, South and East Drives from the proposals in these paragraphs to provide a north-south route between Sandpit Lane and Hatfield Road certainly for buses and potentially for all motorists, and to use East Drive for construction traffic. If these proposals remain in the plan it is essential that appropriate mitigation measures are also retained.</p> <p>Policy T1- Traffic Congestion and Road Safety. We support the requirements for:</p> <ul style="list-style-type: none"> - Impact assessments on pedestrian road safety, - Walking and cycling routes appropriate to the size of the scheme - These routes to connect with adjacent paths and facilities <p>Paragraphs 5.59, 5.60, 5.61 and 5.62. We support the proposals for highway improvements to improve pedestrian safety</p> <p>Policy T3 Walking Cycling and Recreational Travel We very strongly support all the elements of this policy and in particular the emphasis on Herts County Council's Rights of Way Improvement Plan (ROWIP).</p> <p>Paragraph 5.74. We support the measures described in this paragraph.</p> <p>We are pleased that policy E1 encourages developers to register open spaces as Village Greens but</p>
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		<p>are disappointed that it is not a stronger requirement. Registration as a Town or Village Green provides permanent protection against development and guarantees public access in perpetuity.</p> <p>Nomansland Common is an important recreational area where walkers have the freedom to roam and we regret that it is not given greater prominence in this plan.</p> <p>5 Year Forward Action Plan. We welcome the intention to keep the measures enabling and promoting active travel under review.</p>
Hightown Housing Association	SNP15	<p>Hightown Housing Association generally supports the affordable housing provision in Policies D2 and D3, but is concerned about Policy D3 Provision of Affordable Housing for Local People in Perpetuity. The neighbourhood plan area includes the two Broad Locations of North SA and East SA. Given that these are very large strategic allocations at District level, we would query the need for parish priority for the affordable homes.</p> <p>Moreover, the requirement for affordability in perpetuity, is, for shared ownership, (paradoxically) counterproductive. In the event of borrower default, lenders need the theoretical ability to force a sale at full market price. Without this, the choice of mortgages is often narrow, with the remaining lenders offering poorer interest rates, and/or requiring larger deposits. Such restrictions make the SO homes much less affordable to low income buyers.</p> <p>In addition, these hypothetical restrictions on lenders' freedom have the effect, through their security valuation, of reducing the loan amount that lenders offer the HA, to buy the s106 affordable homes from the developer. If the policy were to be retained, we advise that the wording is amended to be subject to it not compromising lenders valuations.</p> <p>Finally, if the policy were retained, for shared ownership to be affordable in perpetuity, the policy would need to specify a cap, typically 75 to 80%, on the total equity purchased via later "staircasing", and we also suggest the policy wording would also need amendment to refer clearly to enforcement via the s106 Agreement rather than planning conditions (which is what currently seems to be implied by the reference to rules for buyback and resale being a condition of planning). From experience, s106 Agreements are more effective.</p>

Miss Melanie Fowler	SNP16	<p>Sandrigebury school causes significant issues with congestion on nearby streets. New builds will put additional pressure on existing infrastructure.</p> <p>D10: Current developments along the Ridgeway are out of character</p> <p>D4 parking standards are justified given high car ownership.</p> <p>Agree that I should not be any further takeaway food outlets at the Quadrant and it would be good to have a better mix of retail services there.</p> <p>Support the proposed re-introduction of a bye law about maintaining and protecting grass verges; this is a particular issue around schools and after substantial building projects where verges are routinely wrecked and not re-instated.</p>
Lambert Smith Hampton on behalf of Oaklands College	SNP17	<p>These representations are submitted on behalf of Oaklands College, in respect of the Sandridge Neighbourhood Plan consultation. Oaklands College's interest relates to the East of St Albans Strategic Location. This site is identified under Policy D7 of the draft Neighbourhood Plan.</p> <p>The College and its advisors note the content of the document and look forward to working with Sandridge Parish Council in delivering the development proposals. The Parish Council is envisaged to play a significant role, both as a consultee in working up the proposals and also as a stakeholder forming part of any Community Management Organisation for the site.</p> <p>Some of the policies within the draft document raise issues that will need to be discussed and agreed with a number of different stakeholders, for example in relation to transportation and affordable housing provision. There will also need to be technical and viability work undertaken, to understand the feasibility of some suggestions. Continued discussion will therefore be required to establish the feasibility and best means of delivery for the various policy suggestions put forwards.</p>
Colney Heath Parish Council	SNP18	<p>The survey evidence does not support some of the elements within Policies D1-D3. No questions were asked about the type or size of homes required in the parish therefore these policies are not evidence based as required in NPPF.</p> <p>CHPC oppose D4 unless it is amended to include working with neighbouring parish councils when</p>

		<p>cross parish matters are being considered i.e. routing of traffic.</p> <p>D5 to include discussions with neighbouring parish councils on cross boundary matters.</p> <p>D7: A large part of Oaklands College is within Colney Heath Parish and outside the Sandridge Neighbourhood Plan Designated area Sandridge Neighbourhood cannot have policies relating to Oaklands College land outside the designated area the word should be amended to reflect this.</p> <p>While the policy does not state cross parish issues the Table of Public Transport Improvements includes cross parish elements therefore this policy includes areas outside the Sandridge Neighbourhood Plan designated area (see below). Additional wording to include working with neighbouring councils when considering cycle and walking improvements would solve the problem.</p>
William Gallagher on behalf of Belgrave Land (Northern No.2) Limited	SNP19	<p>The plan as currently drafted is not consistent with national planning policy or emerging local planning policy.</p> <p>The plan is predicated on the assumption that there is no requirement to allocate sites for residential development over and above those being proposed in the emerging local development plan. However, there is no guarantee that this plan will be progressed in its current form and as such reliance on meeting housing needs through this plan is inappropriate.</p> <p>There are a number of inconsistencies between the proposed policies and supporting texts that mean it does not support sustainable development.</p> <p>The proposed policies will have the effect of constraining development to an unacceptable degree contrary to national planning policy.</p>
Hertfordshire County Council	SNP20	<p>The county council's previous request for additional wording to be included under paragraph 12a of Policy D7 is welcomed, as this ensures that the education requirements are in line with Policy S6(v) of the Publication Draft St Albans Local Plan. It should be noted however that given the current uncertainty surrounding the Publication Draft St Albans Local Plan, the county council will still require the level of primary and secondary education provision that is stated within Policy S6(v), if this site were to still come forward.</p>

	<p>Herts Fire & Rescue Service does not have any specific comments relating to the policies and content of the neighbourhood plan. However, 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 placement of sprinkler systems in all buildings and new developments to form part of an integrated fire safety provision.</p> <p>LLFA. The parish of Sandridge is an area crossed by a surface water flood flow route (direction north – south) which has a significant impact in terms of flood risk from surface water. In the same way, the parish of Sandridge generally has a negligible flood risk from groundwater however there are some localized sites (House Lane and parts of Sandridge village) that are considerably affected from groundwater flooding. The flood risk from fluvial (river and watercourse) flooding risk is small.</p> <p>The Neighbourhood Plan Area falls partially within the sand and gravel belt. The county council, as Minerals Planning Authority (MPA) would raise concerns in relation to unnecessary mineral sterilisation from non-mineral development under Policy 8: Mineral Safeguarding within the Proposed Submission Minerals Local Plan (January 2019).</p> <p>Policy 20: Strategic Transport of the Proposed Submission Minerals Local Plan (2019) ensures that mineral extraction does not hold significant adverse impact on the highway network. While Policy 21: Operational Transport requires proposals for mineral extraction to carry out a Transport Assessment, which will satisfy the concerns in relation to mineral extraction as mentioned in the Neighbourhood Plan.</p> <p>It is requested that as Sandridge Gate Business Centre is allocated as an ELAS within the adopted Waste Site Allocations DPD, this is included under Section 6.14 of the draft plan, along with the associated council depot and HWRC.</p> <p>Transportation matters within the neighbourhood plan, must be in conformity with Hertfordshire's Local Transport Plan 2018-2031 (known as LTP4), which was adopted by the county council in May 2018. LTP4 outlines the county council's transport policy by providing a policy foundation for a balanced approach to transport and consistently promoting and enabling sustainable transport and sustainable</p>
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		travel behaviour, in order to support better economic, social, and environmental outcomes for the county in a context of growth. Comments on individual policies within the neighbourhood plan are set out in the attachment
Pegasus on behalf of Londbourn Estates	SNP21	Highlight examples of the principle concerns relating to the current omission of Land North of Sandridge and the positive role this site can play in helping to address the acute housing need within the District and to achieving the key objectives of the Neighbourhood Plan.
Strutt and Parker on behalf of D'Arblay Investments Limited	SNP22-23	A Neighbourhood Plan has authority to allocate development in the Green Belt. If the neighbourhood plan was to allocate some small and medium sites, including the entirety of our clients site at Orchard Garage, this should be seen as positive planning in seeking to assist with the strategic objectives of the district to deliver a range of housing sites. It will be some time before a new local plan comes into force and as such by identifying those sites which are preferable about the parish, the community will be able to have greater control over its future development. Developing site specific policies for allocated sites will help to ensure that development is not only appropriate to its local context but also delivers the necessary community benefits required.
St Albans Cycle Campaign (STACC)	SNP24	<p>There has been a major shift in Government Transport Policy with <i>Gear change: a bold vision for cycling and walking</i> (July 2020). As the Prime Minister said in launching the policy: “so anyone can ride safely; low-traffic neighbourhoods, to stop rat-running and make it easier to walk and cycle; bus and bike corridors on some main roads”.</p> <p>The Covid 19 pandemic has demanded a huge change in the way people travel. The Secretary of State for Transport said “We've got a once in a lifetime opportunity to create a shift in attitudes for generations to come, and get more people choosing to cycle or walk as part of their daily routine”.</p> <p>The Department for Transport has published LTN 1/20 <i>Cycle Infrastructure Design</i>. This has the clear expectation that highway authorities will create safe cycling networks, and that in developing these networks authorities must adopt the design standards set out in LTN 1/20. (STACC has proposed to Herts County Council that the proposed revision to the cycling section of <i>Roads in Hertfordshire: A Design Guide</i> should now be abandoned and that the Council should adopt the national design standards in LTN 1/20.)</p>

		Detailed comments attached.
Martin Staples	SNP25	<p>The terms 'St.Albans Broad location' could be confusing for many and should be defined or a reference put to where it is defined presumably in the St. Albans local plans.</p> <p>I think your parking proposal/policies under Policy D4 (5.18 point 4) and Appendix 2 annex A 6.6 are going a little too far for a number of reasons compared to recent requirements. Many properties will now not meet this policy so could have difficulties if they seek further planning permission so should be treated on a case by case basis.</p> <p>Generally, I do not think you should require up to 4 off road parking spaces but make the maximum 3 to prevent the erosion of the street scene by loss of front gardens.</p>
Paula Cohen	SNP26	<p>Having lived here for over 20 years, since Heartwood Forest opening, we have seen a massive increase in cars parked in Drovers Lane on the crossing linking the 2 Heartwood paths and excessively more people, bikes etc on the bridle way as a consequence. The main issue is anti social behaviour which is in the form of break ins, noise, waste tipping, arson,</p> <p>Woodland Trust consulted with Neighbours before opening of the surrounding land for public access including new footpaths. They assured us these would not be Right of Way paths so they were able to take action in the event of late night anti social behaviour and all the issues previously mentioned. I was surprised therefore they have not passed any detail of the paths you propose to enhance to Right of Way as it is part of our agreement with them to be consulted on paths due to the proximity to our boundary.</p> <p>As Woodland Trust have one representative covering Heartwood and other sites, they tell us they don't have the manpower to help when we experience incidents and ask us to contact the Police. On doing so a few times, the Police say they will come if they have availability, but they also don't treat this as high priority.</p> <p>My request therefore is that there is no enhancement to the current path across Heartwood land,</p>

		across Drovers Lane and leading to our boundary and the Bridle Path as it would increase the issues we already experience and limit any mitigation that may be open to remedy the situation as it escalates.
LRM on behalf of Hallam Land Limited	SNP27	<p>The ‘Basic Conditions’ test for a Neighbourhood Plan require it to be in general conformity with the strategic policies contained in the Development Plan for the area. In this instance, absent the Draft Local Plan progressing to adoption, the Development Plan is the 1994 Local Plan, which is particularly aged and cannot be deemed to provide appropriate strategic policy context. The Neighbourhood Plan Group will need to consider how it can proceed with its Neighbourhood Plan where there are no up-to-date Development Plan policies.</p> <p>As is referenced in the Draft Neighbourhood Plan, the North St Albans Broad Location allocation shown on the Local Plan’s Proposals Map adjoins the Parish Boundary and the Neighbourhood Plan Area.</p> <p>We have been working with St Albans District Council on the creation of a Masterplan to guide development at this Broad Location. Community and stakeholder events were arranged by the Council, to which Sandridge Parish Council was invited, where the emerging development proposals were discussed. These discussions considered such matters as the opportunity to downgrade or restrict vehicular access along Sandridgebury Lane east of the railway line to discourage highway movements and improve pedestrian and cycle connectivity, improving and creating new footpath routes north of the Site to connect to the Hertfordshire Way, and additional landscaping to complement the Heartwood Forest.</p>
David Lane	SNP28	<p>D1: Is it necessary to keep Sandridge village within the MGB, particularly as the village core is a CA wherein development will in any event be tightly controlled? If your definition of infill is to be contrary to the NPPF would an explanation of the rationale for this divergence be useful? How many dwellings on small scale sites are likely?</p> <p>D2: As there will not be an adopted plan, other than the 1994 Plan, should this policy be reworded? Are you able to enforce a CMP? How can a planning condition support a housing proposal, rather than addressing a potential reason for refusal?</p> <p>Is not the way to supply a meaningful number of affordable units is to allow development in the MGB around the village of Sandridge?</p>

	<p>D3: How can a planning condition control the ownership of a dwelling?</p> <p>D4: 4) Is this requirement contrary to Government advice on climate change? Will it lead to schemes dominated by parked vehicles?</p> <p>T1: Should a 20mph scheme be introduced in Marshalswick? Should Community Speed Watch Wardens be introduced? Should the PC take control of highway verges from HCC to remove vehicle parking on them?</p> <p>T2: Should the new service via Barnfield be provided with a stop on that road?</p> <p>C1/C2: Should not this policy be redrafted to reflect the new use classes order, under which most former Business Use Class premises could be converted to retail? Are not the proposals for up to 10% of hot food takeaways very high? (Currently there are only 2 such premises in The Quadrant, the remainder are in Class E)</p>
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