



# Baldock, Bygrave and Clothall Neighbourhood Plan

Evidence report: December 2019

*Incorporating the Consultation Statement  
and Basic Conditions Statement*



This document provides additional evidence in support of the Neighbourhood Plan for Baldock, Bygrave and Clothall. It records the key evidence that has been drawn upon in producing the plan, and incorporates a 'Consultation Statement' and 'Basic Conditions Statement' which are required to show how the plan complies with certain legal requirements.

The matters covered by the Consultation Statement and the Basic Conditions Statement have been critical in shaping the plan (for example, community views, and how the policies relate to sustainable development and the North Hertfordshire Local Plan). As a result, the Consultation Statement and Basic Conditions Statement are included within this Evidence Report, but the sections that they comprise are identified clearly.

The Neighbourhood Plan has been produced by a small number of volunteers drawn from community organisations in the town, together with representatives from Bygrave Parish Council and Clothall with Luffenhall Parish Meeting. The group is independent of the district and county councils, and of any political parties. Further information about the group is available on our website [www.bbplan.co.uk](http://www.bbplan.co.uk).

The plan has been produced to get the best outcome for Baldock, Bygrave and Clothall from whatever development takes place in and around the town in the future.

# Baldock, Bygrave and Clothall Neighbourhood Plan 2018-31

## Evidence report

### *Incorporating the Consultation Statement and Basic Conditions Statement*

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### The evidence base for the plan

A substantial amount of evidence has been drawn upon in preparing the Neighbourhood Plan. This includes existing studies, community views (including a community survey), commissioned research and site visits.

Because its overall purpose is to add to the policies proposed in the new North Hertfordshire Local Plan, the evidence that has informed the new Local Plan was used extensively, as well as other studies concerning the nature of the area and the potential impacts of new development (including technical studies commissioned by Hertfordshire County Council in support of its initial planning applications for development around Baldock, and the representations made in response to those proposals).

This material formed the basis of a SWOT analysis (strengths, weaknesses, opportunities, threats) for five areas that the neighbourhood plan was likely to focus on:

- Community facilities
- Transport
- The environment
- Open space and recreation
- Design and heritage

The results of this exercise are presented in the following pages. Key documents and other published resources that informed the SWOT analysis are listed at the start of each topic (where applicable, North Hertfordshire District Council is abbreviated to 'NHDC'). In a small number of cases these resources were supplemented with information from local organisations or direct observation. The reports listed do not comprise all of the documents that were reviewed in preparing the Neighbourhood Plan, and nor does the SWOT analysis form the basis of every policy in the plan. The purpose of this exercise was, rather, to build a broad understanding of issues that the Neighbourhood Plan might be able to address.

Documents and other evidence that support particular policies in the Neighbourhood Plan are cited in the footnotes to those policies.

**COMMUNITY FACILITIES**

**Key documents reviewed**

Hertfordshire County Council (undated) *Meeting the Demand for School Places: Summer 2016/17*

NHDC (2011): *Communities Halls Strategy for North Hertfordshire*

RS Regeneration for NHDC (2016; updated 2018) *Infrastructure Delivery Plan*

**Strengths: key features or facilities that are an asset**

Baldock has an active community centre, as well as an Arts and Heritage Centre which came into community use in 2013.

The town hosts two successful festivals each year: the Baldock Festival in May, and the Balstock music festival in September. These make extensive use of community venues and pubs, as do a number of other events.

**Weaknesses: things that detract from the area or are weaknesses in provision**

Baldock’s community centre is of average condition and needs significant investment to bring it up to a good standard (est. £152,000 in 2011).

Baldock has a relatively small number of ‘other’ community halls (such as facilities for scouts and guides) compared to other towns in North Hertfordshire, and these offer relatively few facilities.

After-school provision in the town is over-subscribed, and there is also pressure on the facilities available for scouting.

Baldock library is relatively small compared to other towns in North Hertfordshire, and while it meets current needs it has limited space to expand on site.

The closure of both Lloyds and Barclays banks in 2017 has left the town without a full range of banking facilities.

While Clothall has a recently built community hall, Bygrave has no such provision – and is one of the most remote places from a community hall in the District.

**Opportunities: to improve the area or address impacts from new development**

A new community centre could be provided as part of an urban extension to the north of Baldock.

May be opportunities to use some of the ‘other’ community halls within Baldock more fully, as on average these are not used at capacity.

Likely need for a new children’s centre as part of any major development north of Baldock, and scope for children’s play facilities to be included in new community buildings.

Proposed level of growth in the new North Hertfordshire Local Plan will require additional school places: up to three primary schools and additional secondary provision – based on the HCC standard of 1 form entry / 500 homes for each type of schooling.

Astonia House surgery has some spare capacity currently, but additional or expanded premises will be needed to cater for growth. The best form of providing this needs to be established.

Likely need for a new Safer Policing Team as part of any major development to the north of Baldock, including office space and secure parking.

Opportunities for improved cycle and footpath connections within the town, and for new bus services in association with any major development.

**Threats: to the function or character of the area that may need to be addressed**

Lack of adoption of the Community Infrastructure Levy limits the contributions that can be secured from development for enhanced community facilities in Baldock and the villages.

## TRANSPORT

### Key documents reviewed

AECOM for NHDC (2016) Technical Note: Preferred Local Plan Model Testing Including Baldock Link Roads

Hertfordshire County Council (2007) Report to Highways and Transport Panel, 15 November: Baldock Bypass: One Year On

Hertfordshire County Council (2018) Local Transport Plan 2018 – 2031 ('LTP4')

Hertfordshire County Council (2018) Report to Highways and Environment Cabinet Panel, 14 September: A507 Hertfordshire Heavy Goods Vehicles (HGV) Project Plan

Markides Associates for NHDC (2017) North Hertfordshire Transport Strategy

Markides Associates for NHDC (2017) North Hertfordshire District Council Parking Strategy Review – Phase 1 Report

Markides Associates for NHDC (2018) North Hertfordshire District Council Parking Strategy Review – Phase 2 Report – Draft.

Odyssey Markides for NHDC (2016) Technical Note: Local Plan Transport Technical Review

WYG for Hertfordshire County Council (2017) Baldock North: Transport Assessment

WYG for Hertfordshire County Council (2017) Baldock South East: Transport Assessment.

### Strengths: key features or facilities that are an asset

By-passing of the town by the A1(M) (1963) and A505 (2006) removed much through traffic and lowered congestion overall.

Town centre enhancement (2008) improved the pedestrian environment and parking arrangements.

The previous (2012) Urban Transport Plan actions for Baldock have been delivered, including amendments to Traffic Regulation Orders.

Substantial spare town centre parking capacity exists at the Tesco car park.

### Weaknesses: things that detract from the area or are weaknesses in provision

The Whitehorse Street/Station Road crossroads is operating at or above capacity at present, and experiences regular delays. The scope for improvements is limited by the proximity of existing properties, including two listed buildings.

The car park for Baldock station is fairly small (44 spaces) and tends to be full by 11.00 on a weekday (although cycle parking at the station has spare capacity).

There is poor access to Baldock station for pedestrians and cyclists, including a lack of lift access to the platforms.

Icknield Way/Station Road junction is a difficult interchange for pedestrians to use.

Railway crossing points in Baldock are narrow (at Station Road, Norton Road and a pedestrian tunnel off Icknield Way). The low railway bridge on Station Road is a particular pinch-point, with narrow footways and no space for cycle lanes.

Commuter/long-stay parking pressures affect residential streets that are not within the controlled parking zone.

On-street parking and the one small council car park in the town centre (The Twitchell) tend to be fully utilised during the week (and, in the case of on-street parking, on Saturday).

There can be conflicts between resident and visitor use of on-street parking in the town centre (and because on-street parking is free, visitors have no incentive to use off-street parking unless on-street spaces are full).

The relatively small size of North Hertfordshire's market towns – including Baldock – limits the scope for comprehensive, high frequency urban bus services within them.

Despite its rural character, the A507 experiences many HGV movements as a result of through traffic and farm and industrial operations along its route.

**Opportunities: to improve the area or address impacts from new development**

The A505/B656 corridor between Baldock and Hitchin could offer better opportunities for walking, cycling and bus provision (viewing the towns as a single 'travel market'). More and better crossings for pedestrians/cyclists could be provided, as they could cross the railway line.

A new link road between the A507 and A505 could help to mitigate the impact of the proposed major development to the north of Baldock, but poses a challenge in terms of the balance to be struck between serving the needs of new residents, its potential use as a through route and securing a high quality environment.

More non-car travel to Baldock station could potentially be encouraged.

Reducing long-stay parking at trip destinations like the railway station, town centre and employment areas can help encourage more non-car travel within the town, but is likely to be less effective in relation to trips from outlying villages.

Scope for better use of some parking bays in Baldock town centre.

**Threats: to the function or character of the area that may need to be addressed**

Car traffic in North Hertfordshire is predicted to grow by 17% between 2015 and 2031 (including that arising from the new North Hertfordshire Local Plan proposals).

There is limited 'environmental capacity' to accommodate more traffic within Baldock (making it important to avoid significant future increases in through-traffic).

The scale of development proposed for Baldock in the new North Hertfordshire Local Plan could increase delays at the Whitehorse/Station Road crossroads even with the mitigation measures being considered (signal optimisation); although this depends in part on the degree of modal shift that can be secured.

Capacity at the Clothall Road/Wallington Road/South Road junction could also be exceeded, even with mitigation (although the effects will depend on the route chosen for a southern link road).

Demand for parking in Baldock town centre is likely to increase by 20% by 2031, and demand to park at the railway station is likely to grow by more than 80% over the

same period (taking into account historic trends, improvements to rail services and proposed residential growth).

Parts of site BA1 proposed in the new North Hertfordshire Local Plan are relatively remote from the town centre: i.e. more than a 20 minute walk or 10 minute cycle ride (which could generate demand for car trips unless good public transport is available).

## THE ENVIRONMENT

### Key documents reviewed

AECOM for Baldock, Bygrave and Clothall Planning Group (2019) *Land North of the Railway, Baldock: Landscape and Visual Appraisal*

BSG Ecology for NHDC (2016) *Blackhorse Farm, Baldock – Guidance Note: Corn Bunting*

BSG Ecology for NHDC (2016) *Ecological Advice Note – Ivel Springs*

Land Use Consultants for NHDC (2009) *North Hertfordshire District Green Infrastructure Plan*

Land Use Consultants for NHDC (2013) *Land North of Baldock: Landscape Sensitivity Study*

NHDC (2016) *Strategic Flood Risk Assessment Update*

NHDC (2017) *Baldock Air Quality Paper*

NHDC (2018) *Air Quality Planning Guidance Document*

RS Regeneration for NHDC (2016; updated 2018) *Infrastructure Delivery Plan*

WYG for Hertfordshire County Council (2017) *Land at Baldock North: Flood Risk Assessment & Drainage Strategy*

WYG for Hertfordshire County Council (2017) *Land at Baldock South East: Flood Risk Assessment & Drainage Strategy*

### Strengths: key features or facilities that are an asset

Current nitrogen dioxide (NO<sub>2</sub>) levels within Baldock are below the recognised Air Quality Objective of 40mg/m<sup>3</sup>, and have fallen since 2010.

Baldock's setting within a rolling chalk landscape makes a positive contribution to its distinctive character, affording long-distance views from within the town to the surrounding landscape.

The neighbourhood area contains two local nature reserves – at Ivel Springs immediately to the north-west of Baldock (which contains seasonal chalk springs) and Weston Hills to the south of the town – together with a number of local wildlife sites in Bygrave and Clothall parishes.

### Weaknesses: things that detract from the area or are weaknesses in provision

Baldock sits in a shallow 'bowl' – with higher ground especially to the north and south – which influences the natural dispersal of pollutants.

The A505 through Baldock is associated with air pollution approaching – but not exceeding – a national Air Quality Objective, and is characterised by residential properties lying close to the road.

There has been no monitoring of particulate matter in Baldock, nor are there any specific measures in train to address it.

Although Baldock does not suffer from fluvial flood risk, several parts of the town are at risk of surface water flooding, with a 1 in 30 year event being possible in the vicinity of Icknield Way, Pond Lane, Weston Way, Whitehorse Street and the eastern edge of Clothall Common (although the risk to the latter is likely to have been alleviated by the construction of the Baldock bypass).

### Opportunities: to improve the area or address impacts from new development

There are opportunities to strengthen planting at the edge of Baldock to help maintain the character of the town's setting, in ways which respect the nature of the surrounding landscape. Care will be needed to maintain long-distance views from within Baldock to the surrounding chalk landscape, given their importance for Baldock's character and setting.

Scope exists to enhance the management of the wetland area within Ivel Springs local nature reserve.

The narrow lanes and tracks to the north of Baldock, including Bygrave Road/Ashwell Road, could be maintained and enhanced as 'green corridors'.

There is potential to take a connected approach to managing surface water flood risk across the sites proposed in the new North Hertfordshire Local Plan (and related parts of the town).

Ground conditions underlying most of the allocations proposed in the new North Hertfordshire Local Plan are likely to allow drainage through infiltration, and therefore limit off-site risks from additional surface water flows.

Opportunities exist to incorporate renewable energy projects within new development.

**Threats: to the function or character of the area that may need to be addressed**

A narrow gap (of less than 170m) between Lower Bygrave and the expanded edge of Baldock (if site BA1 proposed in the New North Hertfordshire Local Plan goes ahead) would not secure an effective visual transition between the two places. A gap of at least 250m would be more effective in this respect, as well as retaining longer distance views of the landscape from Lower Bygrave.

Without mitigation, air quality is expected to decline by 2031 due to increased congestion at the Whitehorse Street/Station Road crossroads – both around the crossroads itself and potentially at other locations; although levels at building facades may remain within Air Quality Objective levels.

The proposed link roads in the new North Hertfordshire Local Plan are expected to offset this impact through a net reduction in congestion by 2031 – although this relies heavily on assumed levels of trip redistribution away from the crossroads.

Major development north of Baldock could lead to an increase in uncontrolled recreation use and environmental impacts on the Ivel Springs local nature reserve.

Surface water drainage from major development north of Baldock will need to be managed to avoid any adverse impact on Ivel Springs local nature reserve.

Most proposed allocations for development in Baldock have some level of surface water flood risk. Development of these sites will need to ensure that no additional flood risk is created.

## OPEN SPACE AND RECREATION

### Key documents reviewed

BSG Ecology for NHDC (2016) *Ecological Advice Note – Ivel Springs*

Knight Kavanagh & Page for NHDC (2015) *North Hertfordshire Playing Pitch Strategy Assessment Report*

Knight Kavanagh & Page for NHDC (2016) *North Hertfordshire Indoor Sports Facilities Study Assessment Report*

Knight Kavanagh & Page for NHDC (2018) *North Hertfordshire Indoor Sports Facilities Strategy & Action Plan 2015-2025: Final Draft*

Knight Kavanagh & Page for NHDC (2018) *North Hertfordshire Playing Pitch Strategy & Action Plan 2015-2025: Final Draft*

Land Use Consultants for NHDC (2009) *North Hertfordshire District Green Infrastructure Plan*

NHDC (2016) *North Hertfordshire Open Space Review and Standards*

### Strengths: key features or facilities that are an asset

Baldock has more natural and semi-natural greenspace per person than other towns in North Hertfordshire – and the NHDC figures underestimate the actual level of provision as they exclude the Weston Hills and open land adjoining Clothall Common.

Baldock has the highest level of allotment provision (0.37ha/1,000 people) of the North Hertfordshire towns.

The town has two local nature reserves at its edge – Ivel Springs and the Weston Hills, which provide important and contrasting informal recreation spaces.

Existing amounts of greenspace of different types – including pitches – generally meet or exceed Fields in Trust indicative standards, and NHDC's new standards.

There are two full sized artificial grass pitches available for community use (at Knights Templar School and The Arena), although both are operating at full capacity.

Baldock has one of the most active bowls clubs in North Hertfordshire, and while operating at near capacity, is thought to have sufficient facilities to cater for anticipated future demand.

### Weaknesses: things that detract from the area or are weaknesses in provision

The amount of 'amenity' greenspace within Baldock is low compared to other towns in North Hertfordshire, and slightly below Fields in Trust recommended standards; although this excludes amenity land adjoining Clothall Common.

Baldock relies on clubs in Letchworth, Hitchin and Royston for several sports (e.g. tennis, hockey, rugby, badminton and squash).

Bakers Close playing field is overplayed and of poor quality.

The North Hertfordshire Arena is not of sufficient standard for Baldock Town FC to use for Spartan South Midlands league matches (as a result of which the club ground-shares with Arlesey Town FC).

Baldock has no skate park or BMX facility.

There is limited cemetery capacity with Baldock.

### Opportunities: to improve the area or address impacts from new development

Major development to the north of Baldock would provide the opportunity for significant new greenspace to be provided; while the development proposals more generally create opportunities for new or enhanced green corridors to be created (including improvements to the rights of way network).

Scope for new community green space to be provided at Walls Field in the centre of Baldock, which would help to conserve the scheduled monument and create new opportunities for communicating Baldock's rich history.

Potential for additional allotment provision on Hertfordshire County Council land adjoining North Road.

Scope to provide fitness trails around sports pitches and areas of open space.

The anticipated increase in North Hertfordshire's population is likely to generate demand for additional football pitches and swimming pool capacity.

A big increase in the elderly population is expected over the plan period, generating a particular need for suitable recreation opportunities.

In Baldock specifically, the proposed growth of the town in the new North Hertfordshire Local Plan is likely to generate capacity for new clubs to be formed – including for sports not currently represented in the town – and lead to an associated demand for new facilities.

There will be a need for additional sports hall provision, as demand in North Hertfordshire already exceeds capacity, and the hall at Knights Templar School is fully utilised.

**Threats: to the function or character of the area that may need to be addressed**

The proposed scale of growth for Baldock in the new North Hertfordshire Local Plan could place an unacceptable level of pressure on existing areas of open space and recreational facilities, unless a sufficient amount and range of new provision is made available in line with that growth.

## DESIGN AND HERITAGE

### Key documents reviewed

Amec Foster Wheeler for NHDC (2016) *Heritage Assessment of Baldock*

BDP (2009) *Baldock Town Centre: The Transformation of a Market Town*

Dalton, C. (2007) *The Gardens at Quickwood, the Hunting Lodge of the Earls of Salisbury in Hertfordshire Garden History: a Miscellany* (ed. Anne Rowe)

Historic England (2018) *Heritage at Risk: East of England Register 2018*

NHDC (2003) *Character Statement for Baldock Conservation Area*

NHDC (2003) *Register of Buildings of Local Importance in Baldock*

Thompson, I. for Hertfordshire County Council (2002) *Baldock: Extensive Urban Survey Project Report*

Urban Practitioners for NHDC (2007) *North Hertfordshire Urban Design Assessment: Baldock*

Urban Practitioners for NHDC (2007) *Urban Design Assessment workshop slides*

The *Historic Environment Record* (HER) for Hertfordshire was also consulted, as were Historic England's *National Heritage List for England* (NHLE) and *Heritage at Risk Register*

### Strengths: key features or facilities that are an asset

The Neighbourhood Area contains important collections of listed buildings in Baldock town centre, and to a lesser degree in Luffenhall, Clothall and Upper Bygrave. A number of other buildings in Baldock have been identified as being of particular local value for their historic or architectural interest, or contribution to local character.

The area is very rich in archaeological remains, with extensive areas designated as being of archaeological importance. There are six scheduled monuments, and the remains of an important historic garden at Quickwood Farm.

Baldock town centre has a clear historic street pattern with prominent, attractive, features (e.g. wide market place, historic buildings throughout the centre, trees lining the southern end of the High Street and views of St Mary's Church and Weston Hills).

Consistency of building types and materials, together with the limited range of building heights, give the town centre a strong, distinctive character, with features that reflect its history (e.g. linear building plots, continuous building frontages onto streets, carriage arches).

The town centre improvements of 2008-9 have created attractive paved and grassed areas and given it a cohesive feel.

Residential areas to the south of Baldock have a distinctive 'semi-rural' character of their own, with wide streets and verges, consistent house types and large gardens.

Walls Field scheduled monument has been protected from development and provides part of an important 'green lung' within Baldock.

Attractive views of Baldock from surrounding hills (with St Mary's Church spire providing a strong focal point).

### Weaknesses: things that detract from the area or are weaknesses in provision

Some poor 'gateways' into Baldock along the main roads.

Two significant barriers to movement between different parts of the town: the railway line and the barrier between Sale Drive and Royston Road.

Poor physical connection between Tesco and the rest of the town centre.

Poor street scene and lack of character in some areas of more recent development (e.g. buildings that don't front onto streets, or form a strong building line, or echo local materials and details).

Walls Field scheduled monument is on the 'at risk' register due to the impact of ploughing on its archaeological interest, while St Mary's Church is also on the register due to some parts of the building remaining in poor condition.

**Opportunities: to improve the area or address impacts from new development**

Scope for improved entrances to the town, especially along Royston Road (coupled with improved connections between Sale Drive/Yeomanry Drive and Royston Road).

The architectural heritage of the town provides strong design cues that can be reflected in new development.

Potential to improve connections between Tesco and the rest of the town centre.

**Threats: to the function or character of the area that may need to be addressed**

Baldock's topography – relatively flat but surrounded by areas of higher ground – means that important views of the town and within the town could be harmed by tall buildings or large-scale development.

Increased traffic flows, especially through the Whitehorse Street/Station Road junction, would harm the character of the conservation area.

Development to the north of Baldock could alter the setting of the scheduled ancient monument at Blackhorse Farm (a crop mark complex) and two adjoining listed buildings, depending on the detailed site boundary design.



## Consultation Statement

Throughout the preparation of the plan, the Baldock, Bygrave and Clothall Planning Group has sought to inform the local community about the process, gather as many opinions as possible and reflect these in the way the plan has been put together:

**Website:** A website was set up at an early stage to provide background to the work of the group, advertise forthcoming events and record the activities being undertaken.

**Members' newsletters and emails:** During the initial meetings to establish the group, and through the promotion of subsequent activities, local residents and businesses have been invited to register as supporters. This has enabled newsletters and emails to be distributed, informing them of progress and providing a further means of publicising events.

**Advertising:** Events were publicised in local magazines, namely the Baldock Mail and On Our Doorstep (which is distributed monthly to all households in the area), and the consultation was covered in the local newspaper 'The Comet'. Posters were also put up on community notice boards and promoted using social media.

**Community Events:** As well as becoming members of the group, local residents and businesses were encouraged to make contributions through a number of events:

|   |  |
|---|--|
| Baldock Street Fair May 2017            | Stall inviting comments about aspects of the town's potential growth that are liked, disliked or of concern.                   |
| Public workshop June 2017               | Follow-up to the street fair to identify issues that the Neighbourhood Plan could influence.                                   |
| Organised walks July and September 2017 | Two walks around the main areas that the district and county councils have proposed for new development, led by the committee. |
| Public workshop October 2017            | To update the community about progress and explore topics to include in a community survey.                                    |

|   |   |
|---|---|
| Community survey January/February 2018            | Community-wide survey distributed to households and businesses through an insert in 'On Our Doorstep' magazine. The survey was also promoted on social media and local notice boards. Responses were collected online and via various collection boxes set up around Baldock, Bygrave and Clothall. |
| Knights Templar School community event March 2018 | Presentations of school pupils' project work on the future of Baldock, and summarising the outcome of the community survey, together with discussion groups on topics being considered for inclusion in the Neighbourhood Plan.   |
| Baldock Street Fair May 2018                      | Stall organised by AECOM to collect views on different aspects of design.   |
| Design workshop October 2018                      | Led by AECOM, exploring in more detail the issues raised by the street fair, with discussions on how these might be addressed in the Design Guidelines to accompany the Neighbourhood Plan.   |
| Public meeting July 2019                          | To report the outcome of the consultation on the draft plan and possible amendments.  |

The following pages summarise the outcomes from the Street Fair (May 2017), the Community Survey (January 2018) and the community event at Knights Templar School (March 2018). Feedback from the events run by AECOM is summarised in the Design Guidelines that form part of the Neighbourhood Plan.

A subsequent section outlines the approach to preparing and consulting on the draft Neighbourhood Plan (the formal 'Regulation 14' consultation).

**SUMMARY OF ISSUES RECORDED AT THE BALDOCK STREET FAIR, MAY 2017****Things about the area that people like:**

- Friendliness
- History
- Convenience
- Travel links
- Countryside
- Community
- Markets & events
- Schools & kids areas
- Local businesses

**Concerns about Baldock's potential growth:**

- Schools full
- GPs full
- Loss of Green Belt
- Traffic
- Trains full
- Pollution
- Sewers?
- Housing affordable?
- Damage to historic Baldock
- Loss of farms
- Loss of community
- Jobs

**Ideas for improving the area and managing growth:**

- Cycle Lanes
- Library open more
- Cinema
- Youth & leisure facilities
- Accessibility
- Better public transport
- Businesses & shops
- Police
- Increase GPs
- Parking & traffic
- Volunteers
- Sustainability & renewables
- Good design
- Garden village
- Green spaces

**Particular issues or concerns relating to Bygrave:**

- Light pollution
- Community hall
- Playground
- Traffic calming
- Footpaths
- Green space

THE NEIGHBOURHOOD PLAN SURVEY AND PRESENTATION OF RESULTS

# NEIGHBOURHOOD PLAN SURVEY



You may have heard of the plans to build thousands of homes around Baldock. We have a chance to influence what happens.

Complete the survey online at:  
[www.bbplan.co.uk](http://www.bbplan.co.uk)  
 by 14th February 2018

**YOUR OPINION COUNTS!**

Or fill in and return the survey on pages 3 and 4 of this section to one of our collection points: • Baldock Community Centre • WH Smith, Whitehorse Street • Clothall Common Food & Wine • Weston Way Post Office • Bygrave Church • Clothall Church

The survey is open to anyone living or working in Baldock and the parishes of Bygrave and Clothall. Each person in a household can respond. Extra copies of the form can be downloaded from [www.bbplan.co.uk](http://www.bbplan.co.uk), or scan the QR code.



Baldock could almost double in size over the next 20 to 30 years, if plans put forward by our local councils get approved. We'll know for sure some time in 2018, when the outcome of the examination into North Hertfordshire's Local Plan is made public.

To get the best outcome for Baldock, Bygrave and Clothall if it goes ahead, we are producing a neighbourhood plan.

A neighbourhood plan can't stop the developments happening. But it can influence how it takes place, and protect the things that local people value most about the town.

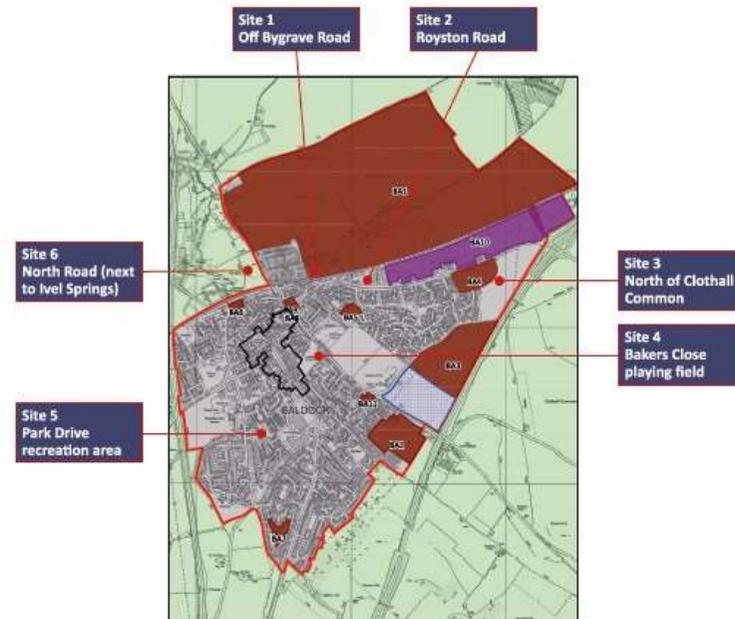
To help produce the plan we need to know what you think about some important issues. The survey is short so it's easy to complete, but there is space at the end to add any extra comments.

The neighbourhood plan will cover the whole of Baldock, as well as Bygrave and Clothall parishes (as some of the new development would be in these areas).

Once complete, the neighbourhood plan will have force in law as something the district council needs to consider when deciding any planning applications.

*The neighbourhood plan is being produced by a small number of volunteers drawn from community organisations in Baldock, Bygrave and Clothall, supported by a wider group of local residents and business representatives. We are independent of the district and county councils. Further information is available on our website [www.bbplan.co.uk](http://www.bbplan.co.uk), where you can also find out more about what the plan can and can't influence. If you'd like to join the group or think you could help with the work, please email us at [info@bbplan.co.uk](mailto:info@bbplan.co.uk)*

The map shows the location of sites that are mentioned in the questionnaire. The areas shaded brown or purple are the areas being proposed for development in North Hertfordshire's local plan (brown is residential, purple is employment, purple grid is open space).



**Baldock, Bygrave and Clothall NEIGHBOURHOOD PLAN SURVEY**

Please could you respond to this survey online at [www.bbplan.co.uk](http://www.bbplan.co.uk), or else tear off and return this form to one of the collection points listed on the front page. Please reply by 14th February 2018.

**How should Baldock grow?**

The neighbourhood plan can help ensure new developments have the right facilities and feel part of Baldock. To do this, we need to know what you think about the way the town should grow.

**Q1** If Baldock's expansion goes ahead, how important do you think each of the following things will be?

| please tick one box for each issue   | Very important | Important | Not important |
|--|----------------|-----------|---------------|
| Good footpath, cycle and road connections between existing parts of the town and the new developments              |                |           |               |
| New homes and facilities that meet the needs of people already living and working in Baldock, Bygrave and Clothall |                |           |               |
| Keeping a gap between Baldock and Bygrave, so that Bygrave stays a separate village with its own rural character   |                |           |               |
| Ensuring historic features like hedges and Bygrave Road are kept as part of the new development                    |                |           |               |
| Designing the new buildings and streets to reflect Baldock's existing character                                    |                |           |               |

**Housing**

To help make sure the new developments provide the sort of homes that local people need, it would be useful to know what types of housing you think should be the priority.

**Q2** If more homes are built here, how important are each of the following?

| please tick one box for each type of home | Very important | Important | Not important |
|---|----------------|-----------|---------------|
| 1-2 bed houses                            |                |           |               |
| 3-4 bed houses                            |                |           |               |
| 5+ bed houses                             |                |           |               |
| Flats                                     |                |           |               |
| Retirement properties                     |                |           |               |
| Custom or self-built homes                |                |           |               |

**Recreation**

The district and county councils are proposing new facilities like schools, shops and a GP surgery if development goes ahead. But more information is needed about the recreation facilities that should be provided, so we need your views about this.

**Q3** If Baldock expands significantly, how important will it be to provide each of the following?

| please tick one box for each type of facility | Very important | Important | Not important |
|---|----------------|-----------|---------------|
| Pitches for football, rugby or cricket        |                |           |               |
| Fitness trail                                 |                |           |               |
| Tennis courts                                 |                |           |               |
| Indoor sports hall                            |                |           |               |
| Additional venues to hire (for clubs etc.)    |                |           |               |
| Other recreation facilities (please specify)  |                |           |               |

**Station parking**

Parking at Baldock station is limited, and cars are often parked some distance away, adding to congestion on local roads. However, more station parking might just encourage more people to drive into the town. We'd like to know what you think about this.

**Q4** Do you think that more parking should be available at Baldock station?

Yes  Not sure  No

**Q5** If more station parking is provided, where do you think it should be?

| see map on page 2 for site locations – please tick if you support one or more of these sites, which could be accessed by new footpaths between them and the station |  |
|---|--|
| Site 1: Off Bygrave Road  |  |
| Site 2: Royston Road (relocate existing commercial use further along the road)  |  |
| Somewhere else (please specify)   |  |

**Open space**

The neighbourhood plan can give more protection to areas of open space that local people value, especially where there is public access to them. To do this, we need to know how much some areas are used. We have excluded Avenue Park and the nature reserves at Ivel Springs and Weston Hills, which are relatively well protected already.

**Q6** How often do you use the following areas of open space?

| see map on page 2 for site locations      | Most days | Most weeks | Sometimes | Never |
|---|-----------|------------|-----------|-------|
| Site 3: North of Clothall Common          |           |            |           |       |
| Site 4: Bakers Close playing field        |           |            |           |       |
| Site 5: Park Drive recreation area        |           |            |           |       |
| Site 6: North Road (next to Ivel Springs) |           |            |           |       |

**Q7** Are there other things that you think the neighbourhood plan should consider?

*We know that many people are concerned about things like traffic and affordable housing if the developments go ahead. We have not asked about these here, as they are not things that the neighbourhood plan can control, but we and other groups are continuing to raise these issues with the district and county councils.*

**About you**

We'd be grateful if you could provide a few details about yourself to help us assess the responses. We have kept these to a minimum, and none of the questions will identify you individually.

**Q8** What age group are you in?

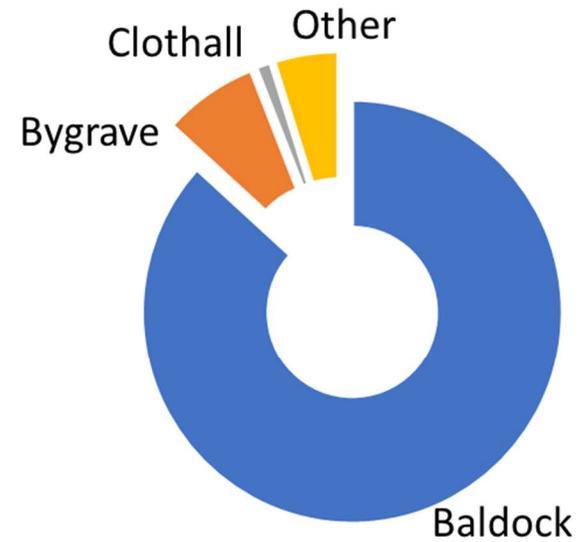
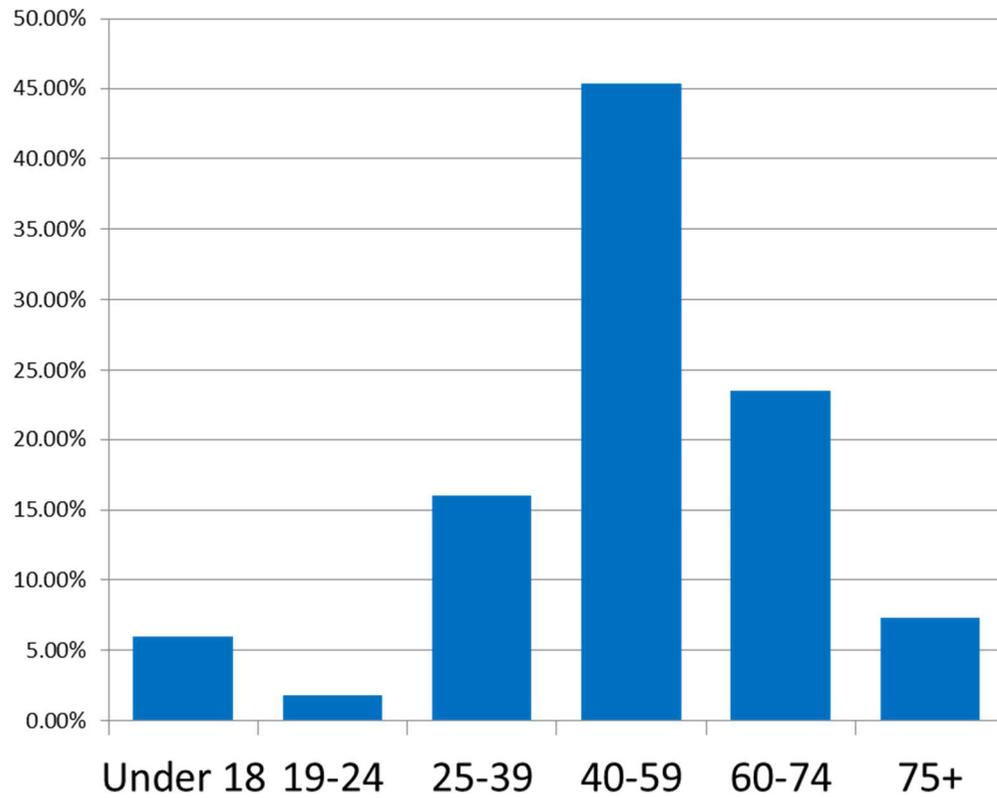
Under 18  19-24  25-39  40-59  60-74  75+

**Q9** Where do you live?

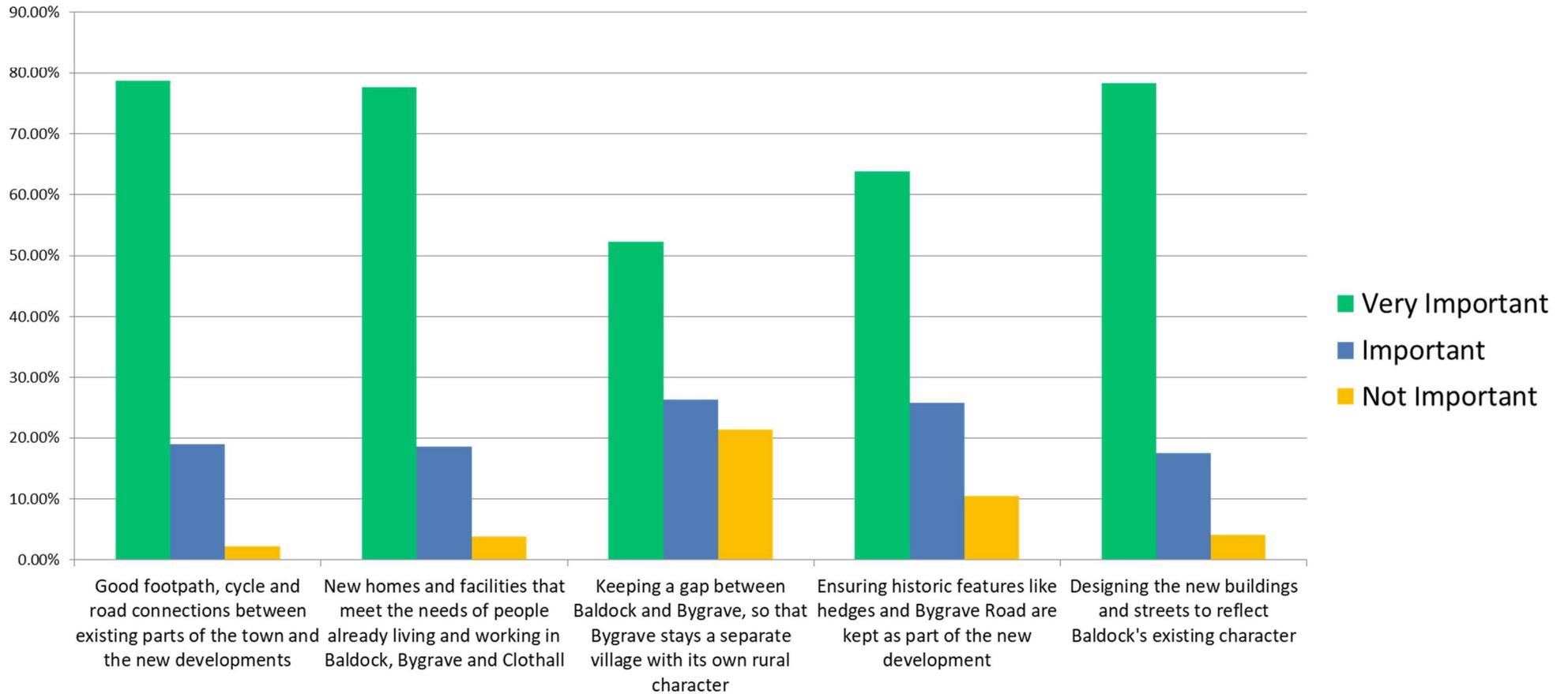
Baldock  Bygrave  Clothall Village  Other (please specify)

Thank you for taking the time to help us to create a Neighbourhood Plan for Baldock, Bygrave and Clothall.

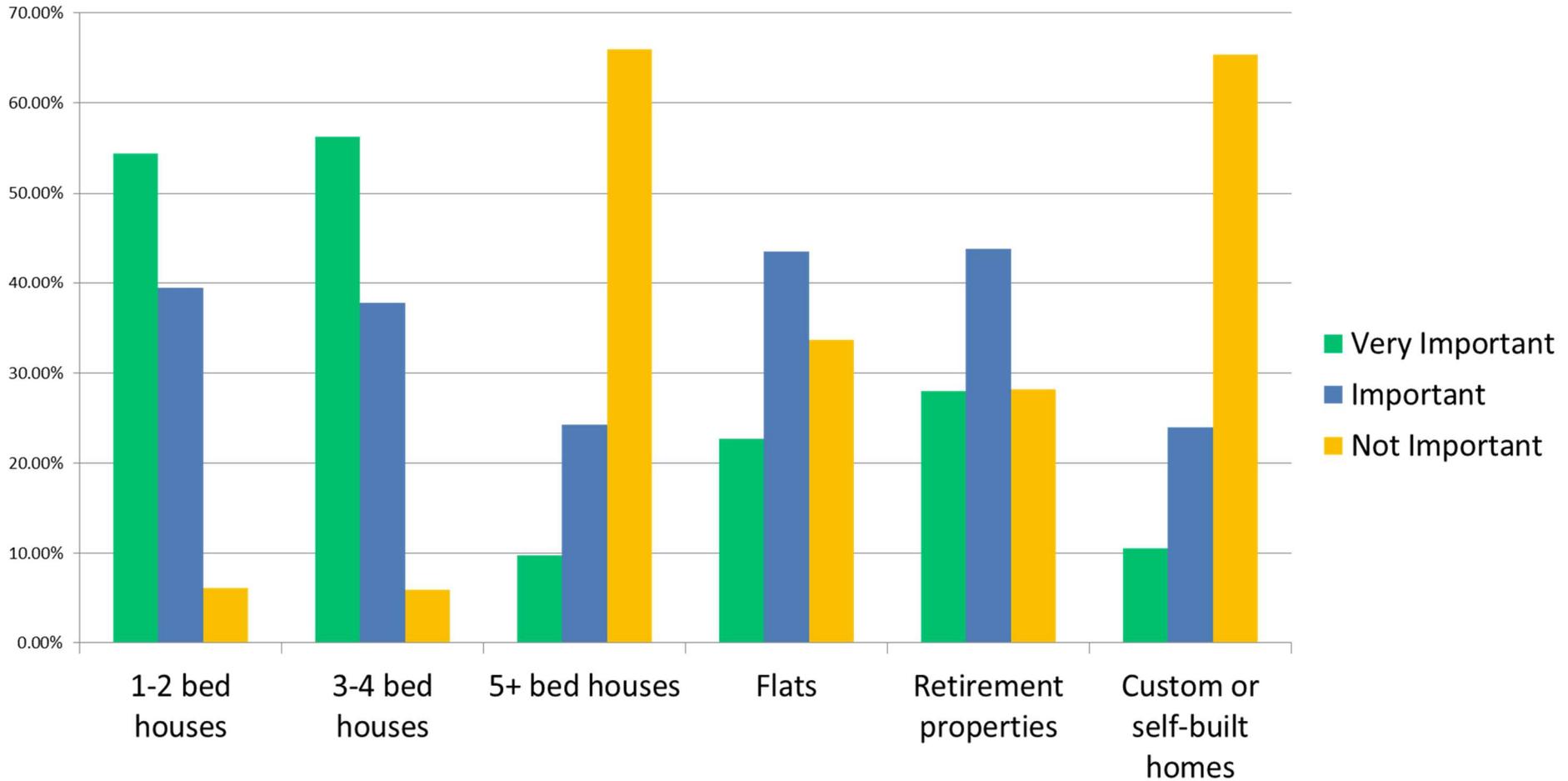
**There were 581 responses to the community survey, from these age groups and areas:**



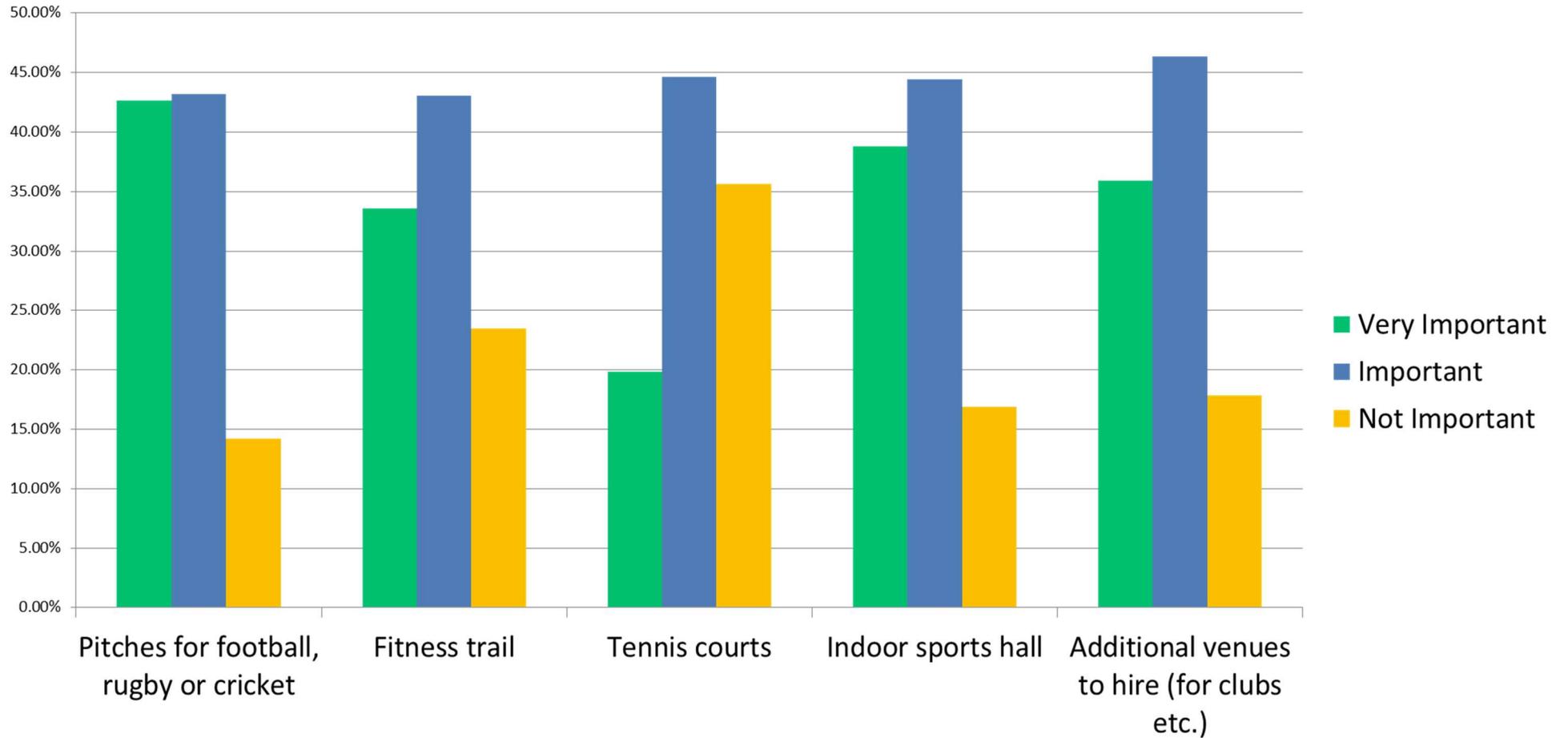
### If Baldock's expansion goes ahead, how important do you think each of the following things will be?



### If more homes are built here, how important are each of the following?



### If Baldock expands significantly, how important are each of the following?



**A wide range of other recreation facilities was also mentioned:**

*Number of mentions*

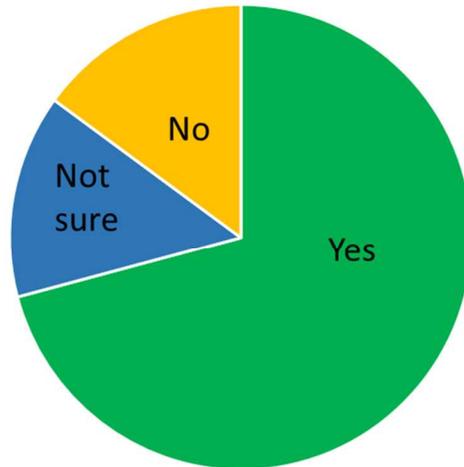
|                              |    |
|------------------------------|----|
| Swimming Pool                | 41 |
| Gym                          | 15 |
| Skate Park                   | 12 |
| Outdoor exercise equipment   | 11 |
| All weather pitches          | 4  |
| improved football ground     | 3  |
| Hockey and Netball pitches   | 2  |
| Golf club                    | 2  |
| indoor bowling               | 2  |
| Bowling alley                | 2  |
| Basketball courts            | 2  |
| Ice rink                     | 2  |
| Gym for over 65s             | 1  |
| Speedway track               | 1  |
| Wheelchair accessible sports | 1  |
| Putting/Crazy golf           | 1  |
| Indoor tennis courts         | 1  |

|  |   |
|--|---|
| Youth Club                               | 9 |
| Cinema                                   | 8 |
| Childrens Activity Centre / Scouts       | 5 |
| Local community Centres                  | 5 |
| Churches                                 | 3 |
| Theatre                                  | 3 |
| Schools                                  | 3 |
| Bygrave Village Hall                     | 3 |
| Shops                                    | 3 |
| Communal seating areas / social areas    | 2 |
| Pubs / Nightclub                         | 2 |
| Library / facilities for ART/music/drama | 2 |
| Cemetery                                 | 2 |

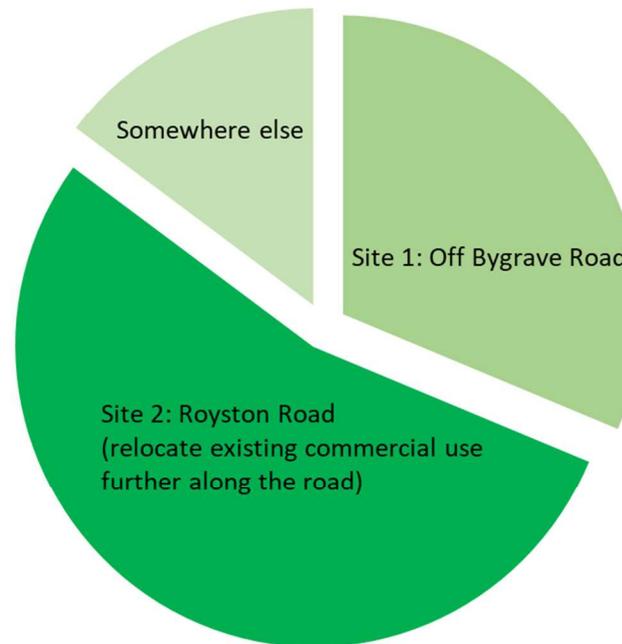


|  |    |
|--|----|
| Natural wildlife/Lakes/places to sit/flowers and trees | 65 |
| Playground/ Swings etc / dog free / ball games         | 46 |
| Cycle Paths / Greenway extension/child friendly routes | 27 |
| Maintain Footpaths / Bridleways                        | 14 |
| Dog walking areas                                      | 12 |
| Cycle track/ running track                             | 12 |
| Allotments   | 3  |
| Ivel Springs nature reserve visitor centre             | 2  |

**Do you think that more parking should be available at Baldock station?**



**If more station parking is provided, where do you think it should be?**



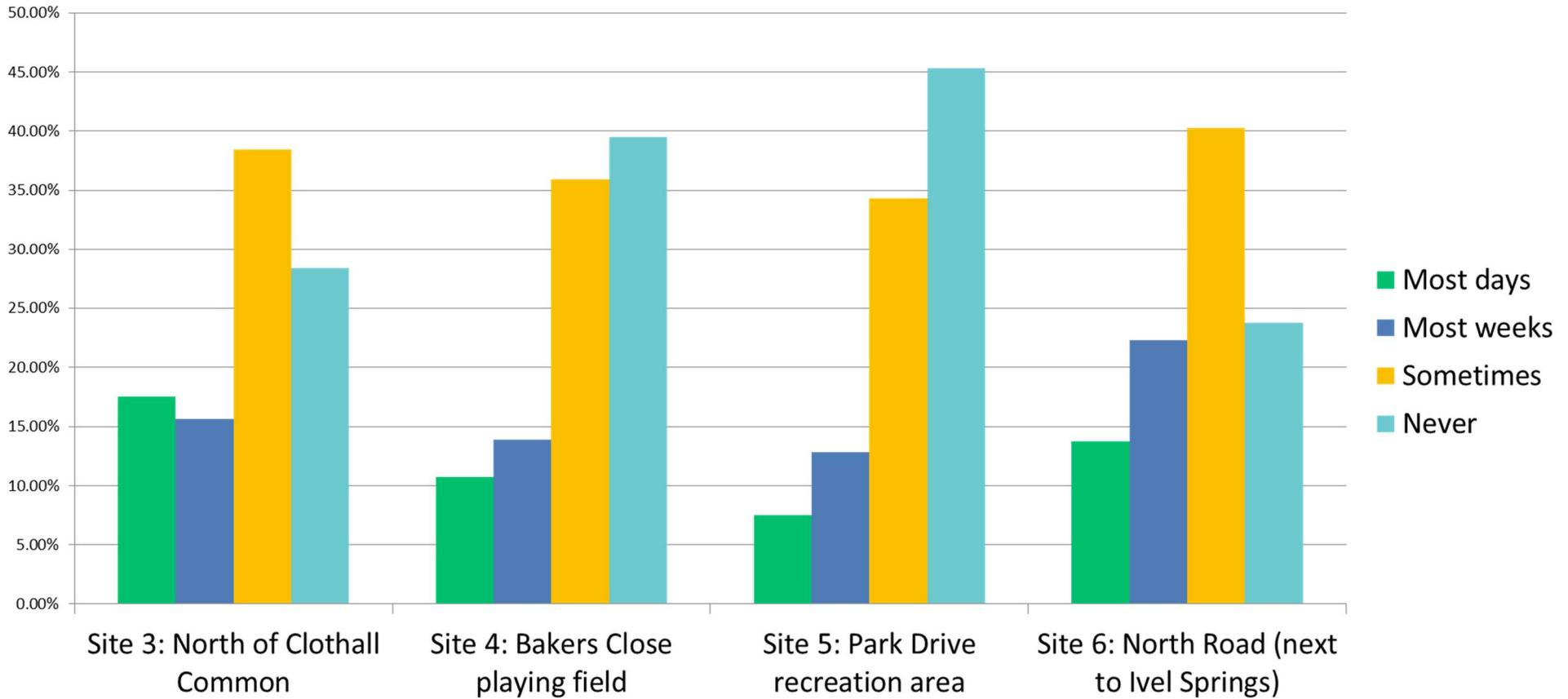
Somewhere else :-

- Multistorey on current carpark North Road
- Park and Ride (Baldock services)
- Not on local roads
- Relocate Station
- Engine Pub site
- Tesco/Clothall common park
- Icknield Way - disused factory site

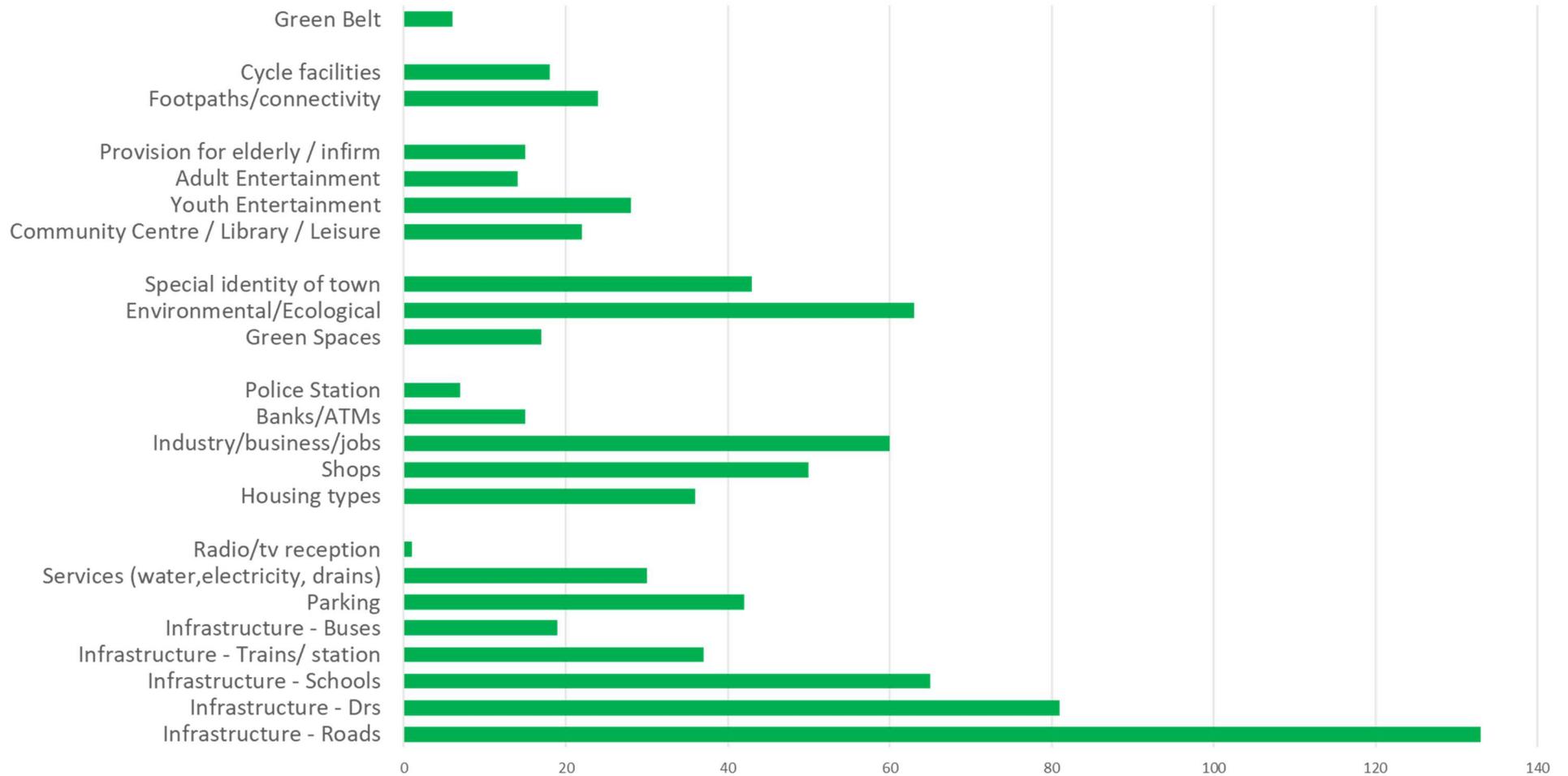
Consider:

- wheelchair access
- cost of parking
- better parking restrictions

### How often do you use the following areas of open space?



### Other issues for the Neighbourhood Plan to consider



## SUMMARY OF ISSUES DISCUSSED AT COMMUNITY EVENT, MARCH 2018

Table-based discussion groups focused on the following topics:

1. Preserving the special identity of Baldock and Bygrave
2. Integration of new and old Baldock
3. New features for 'old' Baldock to encourage integration
4. Leisure facilities for all
5. Open spaces/ ecology/ environment
6. Cycle tracks/ footpaths/ bridleways

The key points raised are summarised below:

- Community centres needed early on during building to act as a focus for coordination and information.
  - Architecture sympathetic to that of 'old' Baldock.
  - New groups (Guiding etc.) to be set up early, may attract some people from 'old' town. Youth Club.
  - Teaching/ sharing Baldock's history – naming streets/ parks etc. after the area's historic events. History trail?
  - Retain or copy the medieval street layout in some areas (shopping or leisure areas?) – gateways/ courtyards – in the new development.
  - Information boards to explain the history of the local area.
  - Use Garden City guidelines?
  - Excavated feature to demonstrate local history of the area?
- 
- Importance of timing and integration of developments.
  - Public competitions – consult locals on house design (similar to Wilbury Rd, Letchworth? Garden City Cottages competition?).
  - Competition to design a sculpture for a public position / square.
  - Integration could be difficult due to distances, parking etc.
  - Integration by town events and social media, leafleting etc.
  - Encourage a New Residents Committee to hold new events
  - A Town Council to cover the whole area?
  - Encourage integration through children's events.
- 
- More support for Arts & Heritage Centre to hold more community events.
  - A small cinema in the Arts & Heritage Centre.
  - A new events venue with flexible use and good capacity.
  - Leisure facilities for sports and other events.
  - Swimming pool indoor/ outdoor.
  - Better shopping opportunities in 'old' Baldock.
  - Space for extra buildings will be at a premium.
- 
- Open air swimming pool linked to outdoor leisure park and skate boarding park, tennis and badminton courts, cricket pitch.
  - No-car zones to aid social and family interaction.
  - Public toilets with wheelchair access/ disabled facilities.
  - Outdoor exercise equipment – fitness trail, walking trail.
- 
- Community gardens, meeting places, areas to walk and cycle.
  - Wildlife area, children's farm, maybe near nursery or lake.
  - Hedgehog highways throughout development.
  - No bypass or large HGVs through development.
  - Proper green space between BA1 development and Bygrave.
  - Preserve hedges/ trees and plant new ones.
  - New nature reserve (+pond) to protect rare and endangered species.
  - Permeable driveways etc. to allow rain to drain through. Protect Ivel Springs.
- 
- Linked-up footpaths and cycle tracks leading to key destinations in Baldock, Letchworth and other places. May need tunnels under roads for bikes/ walkers.
  - Link to Letchworth Greenway.
  - Safe areas for children to cycle and scoot etc.
  - Secure lock-ups for electric bikes at station and in town to encourage them and to reduce the need for more car parking.
  - Secure bike sheds between roads on new estates for communal use.

### Preparing the draft Neighbourhood Plan for consultation

The formal 'Regulation 14' consultation on the draft Neighbourhood Plan was the culmination of a long period of discussions with a large number of people and organisations. The issues raised during the initial rounds of community engagement had helped to identify a number of topics that the Neighbourhood Plan could most usefully focus on. These topics were also informed by the review of evidence and resulting SWOT analysis set out earlier in this evidence report, and by a 'gap analysis' of the new North Hertfordshire Local Plan (see pages 69-71 of this report). The gap analysis was important for identifying issues that the new Local Plan was already likely to cover sufficiently, such as the mix of housing to be provided.

In the light of this, the five topics that were identified as the most appropriate focus for the Neighbourhood Plan were:

- Community facilities
- Transport
- The environment
- Open space and recreation
- Design and heritage

The initial community discussions had also revealed a high level of concern about the scale of growth being proposed in the new North Hertfordshire Local Plan, as well as the importance of maintaining the distinctive character of the villages in the neighbourhood area. As a result, it was decided that these topics needed to be addressed through a combination of general policies, ones specific to the allocations being proposed in the new Local Plan and some specifically for the villages.

The community discussions, and the reviews of the evidence base and the new North Hertfordshire Local Plan, allowed an initial set of policies to be drafted. These were discussed informally with members of the Baldock, Bygrave and Clothall Planning Group, local councillors, officers and consultants working for North Hertfordshire District Council and Hertfordshire County Council, and relevant agencies (Historic England, Natural England, the Environment Agency and Sport England). Their feedback was taken into account in refining the policies and finalising the draft Neighbourhood Plan for consultation. For example, advice from Historic England helped to inform the approach to protecting Walls Field (Policy G2), while a

meeting with the County Council's transport planning team was used to refine the approach to transport and station parking.

The accompanying Design Guidelines were also informed by community engagement to identify design preferences and concerns, both through a stall at the 2018 Baldock street fair and a dedicated workshop, details of which are contained in the Design Guidelines.

### Publicising the consultation

The consultation on the draft Neighbourhood Plan was given advance publicity (including how to view the plan and comment) in a number of ways:

- Articles in the community magazine 'On Our Doorstep' and the local paper 'The Comet' (both of which are distributed door-to-door in the area);
- Posters on community notice boards and in a number of shops;
- Promotion through local social media channels;
- Publicity on the group's own website; and
- Direct notifications to members of the group and a large number of organisations and groups.

The organisations that were notified of the draft Neighbourhood Plan directly (as it was considered their interests may be affected by the proposals) included:

- The District and County Councils, neighbouring authorities (including parish councils) and Letchworth Garden City Heritage Foundation;
- Consultants acting for Hertfordshire County Council's Property Department;
- National agencies and public bodies: Historic England, Natural England, the Environment Agency, Sport England, the Forestry Commission, Highways England and Network Rail;
- Anglian Water and Affinity Water;
- Hertfordshire Police, local NHS interests (including the Clinical Commissioning Group) and the Local Enterprise Partnership;
- Local churches, schools, after-school club, scouts/guides and other community groups.

The pre-consultation publicity and notification included details of a public exhibition that was used to launch the consultation. This was held in Baldock Community Centre on the evening of Friday 3 May and morning of Saturday 4 May 2019. A series of exhibition boards explained the purpose of the Neighbourhood Plan, its key proposals and how to view and comment on them.

The formal consultation period began at the start of the next week, running for six weeks from 7 May to 18 June 2019. During the consultation period, the opportunity to comment was highlighted further through another article in ‘On Our Doorstep’, renewed social media coverage (including a bespoke animation to promote the plan) and a stall at Baldock’s annual street fair which re-presented the exhibition.

### Gathering and analysing the responses

Copies of the consultation materials were made available on the Baldock, Bygrave and Clothall Planning Group’s website and in Baldock library, with responses being invited either via an electronic response form or using a paper questionnaire (copies of which were available at Baldock Community Centre and Bygrave and Clothall churches, together with collection boxes for returned forms).

The public exhibition attracted a good level of interest, with over 100 visitors, while the street fair also attracted a steady stream of visitors during the day. The formal consultation itself gained a smaller number of returns, with 43 received in total (of which nine could not be recorded as being properly made, as they were either incomplete or lacked a name and address, in spite of the need for this being clear on the response form).

All of the responses that were properly made were analysed to assess whether they supported, objected to or had no opinion on each policy (as well as the overall vision, key objectives and Design Guidelines). The following pages summarise the balance of views, as well as the comments that implied a potential change to the draft Neighbourhood Plan. These comments were often made by those supporting a policy, rather than by those objecting. As a result, all the comments have been recorded together so that the full range of suggested changes is represented. Where changes have been made to the draft plan in response to these comments, the nature of the change is flagged in bold in the final column. The final column also sets

out the Baldock, Bygrave and Clothall Planning Group’s reasons for amending or not amending the plan in the light of the comments received.

### Key changes made to the draft Neighbourhood Plan

Numerous adjustments have been made to the draft policies in the light of the Regulation 14 consultation. Many of these are minor points as detailed in the tables that follow. The more significant changes include:

- Additional emphasis on the importance of walking and cycling links as part of promoting sustainable travel;
- The policy on creating well-designed places has been moved to the group of general policies, in recognition of the fact that good design is important for all developments (not just those proposed in the new North Hertfordshire Local Plan), and the fact that the Design Guidelines set out principles that can apply across the Neighbourhood Area;
- The policy on Baldock conservation area has been expanded to recognise the importance of maintaining important views of St Mary’s Church;
- Reference has been made to the importance of increasing tree cover as part of the major developments proposed in the new North Hertfordshire Local Plan;
- The size and character of the gap which it is necessary to maintain between Lower Bygrave and the expanded edge of Baldock (should site BA1 proposed in the new North Hertfordshire Local Plan proceed) has been clarified;
- A map illustrating key views from Bygrave that need to be respected has been added; and
- Additional justification has been provided for the importance of maintaining an area of undeveloped land on raised ground immediately to the east of Clothall Common.

These changes, as well as the more minor adjustments, are reflected in the revised version of the Neighbourhood Plan which has been submitted to North Hertfordshire District Council. **Note that as a result of moving the policy on well-designed places, not all of the policy numbers in the submitted Neighbourhood Plan correspond to those in the consultation draft. The table that follows is ordered in line with the revised document, but the corresponding policy numbers in the consultation draft are shown in brackets for ease of reference.**

**Overall vision**

We asked for views on the draft Neighbourhood Plan’s overall vision. 19 respondents strongly agreed with it, a further four agreed and two were undecided. No responses disagreed either ‘slightly’ or ‘strongly’. A further nine responses gave no reply to this question. A number of responses commented on the vision; those that implied a potential change to it are summarised below.

| Respondent / organisation                 | Issue   | Response   |
|---|---|--|
| 10793164076                               | Growth in Baldock must be sustainable and reduce commuting by car for employment.   | The vision and its supporting objectives and policies aim to achieve growth which is sustainable (insofar as the Neighbourhood Plan is able to influence the proposals emerging from the District and County Councils). New transport infrastructure and services, as well as additional job opportunities in Baldock, will be important for limiting car-based commuting.   |
| 10805937436                               | Protect existing connectivity with surrounding rural areas (e.g. keeping and enhancing cycling / walking links along the Old Wallington Rd within site BA3).                            | This is reflected in the policies in the Neighbourhood Plan, but has also been addressed through an addition to the objectives and supporting text (see responses to comments on the key objectives).  |
| 10804303514                               | The plan should be more clearly framed within the context of the local area: opportunity to create a project like the adjoining Letchworth Garden City, and to introduce more woodland. | The Neighbourhood Plan – including the Design Guidelines – responds to the existing character of the Neighbourhood Area and how it could change. The importance of creating a high quality environment for the future that respects this context is central to the vision, objectives and policies, and Policy E2 has been strengthened to make explicit reference to the importance of additional tree cover.                   |
| 10773748773<br>10730068645<br>10744633924 | Strong community feel, supported by sufficient infrastructure, are important parts of the vision (concerned that the infrastructure proposed will be insufficient to achieve this).     | We agree about the importance of these elements, which is reflected in the way the Neighbourhood Plan seeks to fill gaps in the policies and safeguards contained in the North Hertfordshire Local Plan. There are limits to how much infrastructure can be required on the back of development, but the Neighbourhood Plan tries to go as far as it can to ensure that growth will not have an unacceptable impact on the area. |

## Key objectives

We asked for views on the draft Neighbourhood Plan's key objectives. 19 respondents strongly agreed with them, a further five agreed and one was undecided. No responses disagreed either 'slightly' or 'strongly'. A further nine responses gave no reply to this question. A number of responses commented on the objectives; those that implied a potential change to them are summarised below.

| Respondent / organisation | Issue  | Response  |
|---------------------------|--|---|
| 10805937436               | Protect existing connectivity with surrounding rural areas (e.g. keeping and enhancing cycling / walking links along the Old Wallington Rd within site BA3). | <b>Key objectives and text on page 6 modified</b> to reflect this point (which is also addressed through some of the Neighbourhood Plan policies themselves).   |
| 10804303514               | Set objectives within a wider garden city context, taking the opportunity to create a greatly improved landscape with woodland.                              | The Neighbourhood Plan – including the Design Guidelines – responds to the existing character of the Neighbourhood Area and how it could change, although this is different to the Garden City context found in Letchworth. The importance of creating a high quality environment for the future that respects this context is central to the vision, objectives and policies, and Policy E2 has been strengthened to make explicit reference to the importance of additional tree cover.                         |
| 10802960680               | Emphasise Bygrave must not be considered a suburb of Baldock.  | The objectives already make clear that Bygrave should maintain its rural character and separate identity.   |
| 10793164076               | Securing the right infrastructure for any growth is critical.  | This is one of the key objectives and reflected in a number of policies in the Neighbourhood Plan.  |
| 10785796398               | Consider sites for local green energy production, including wind.  | This is desirable in principle. However, the Neighbourhood Plan has not attempted to address all aspects of planning for a more sustainable future, partly because the new North Hertfordshire Local Plan addresses some issues, but also because producing more extensive policies for the Neighbourhood Plan would require further research and evidence which has not been possible with the resources available to us currently. It could potentially be tackled in the future through an update to the plan. |
| 10744633924               | Should be a lot of open spaces so the rural feel of Baldock is retained.   | The importance of open spaces is reflected in the vision for the Neighbourhood Plan, and covered in general terms by the reference in the objectives to securing the right infrastructure and facilities. It is addressed more fully by Policies E2 and G2.   |

**G1 Improving access and parking**

20 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were four objections (although two of these were expressed in terms of support and wanting the policy to go further in relation to improvements to the railway station). A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|                          |   |   |
|--------------------------|---|---|
| 10805937436              | Oppose extra parking for journeys under one mile as it adds to peak hour traffic and congestion, additional pressure on nearby on-street parking (affecting local amenity) and increases air pollution. Encourage walking and cycling instead.  | <p><b>Policy amended</b> to make clear that additional parking would need to be justified by the scale of development proposed in the new North Hertfordshire Local Plan once the latter is adopted. The range of views for and against additional parking to serve Baldock station highlight both the arguments for some additional provision, and the importance of discouraging car journeys to the station that could be made by other means. The policy and its supporting text recognise this tension, and seek to strike an appropriate balance by providing only for a limited increase in provision, and noting the importance of complementary measures to manage on-street parking and parking demand. It has been informed by the parking strategy prepared recently for North Hertfordshire District Council, which includes an assessment of current and potential future demand for parking at the station. As any additional provision would be limited, it is not considered that it would lead to a significant increase in traffic on Whitehorse Street or the A507, although the local highways impacts would need to be considered as part of any planning application, and would depend on the location chosen.</p> |
| 10799882468              | A large car park would be wrong as there isn't space and it would add to traffic (so support some limited extra provision, alongside cycling and a bus service).  |   |
| 10785796398              | Station parking is important when car travel is needed for associated journeys such as school drop-off/collection.  |   |
| 10760525926              | For people living at the edges of site BA1, walking or cycling will not be a realistic way of getting to the station.   |   |
| 10739623979              | Significant additional parking needed to cater for people who can't walk, cycle or use public transport to get to the station (e.g. because of living too far away). Inadequate parking will just create extra pressure on surrounding streets. |   |
| 10785796398              | Station parking is important when car travel is needed for associated journeys such as school drop-off/collection.  |   |
| 10760525926              | For people living at the edges of site BA1, walking or cycling will not be a realistic way of getting to the station.   |   |
| 10739623979              | Significant additional parking needed to cater for people who can't walk, cycle or use public transport to get to the station (e.g. because of living too far away). Inadequate parking will just create extra pressure on surrounding streets. |   |
| 10803396419              | Support but concerned about traffic on Whitehorse Street.   |   |
| 10745210672              | Support but will need the extra traffic on the A507 from Baldock services to be addressed.  |   |
| N Herts District Council | Balance is needed between additional parking, managing on-street parking and encouraging use of sustainable modes of transport.   |   |
| Herts County Council     | Any additional station parking needs careful consideration, due to the risk of encouraging car journeys. A parking assessment is needed to understand the correct balance.  |   |

|   |   |  |
|---|---|--|
| 10793164076<br>N Herts District Council | The plan could be stronger in promoting more sustainable modes; need to improve pedestrian and cycle access to the station as well.   | <b>Policy and supporting text amended</b> to make additional reference to sustainable travel modes. The Neighbourhood Plan tries to avoid unnecessary duplication of policies in the North Hertfordshire Local Plan, including those relating to sustainable transport. It does, however, contain a number of measures to make more sustainable travel easier, including in relation to Baldock station. The policy and supporting text have been amended to make this clearer.  |
| 10773748773<br>10730068645              | Need to go further in supporting station improvements such as lifts, waiting areas and refreshment facilities, together with access to the station from the north.  | Policy G1 requires the provision of lifts, while the new North Hertfordshire Local Plan (which also supports station improvements) notes the importance of providing access from the north. The precise scope and deliverability of wider station facilities such as waiting areas and refreshments is best determined through more detailed assessments to inform individual planning applications (where required), and following consultation with the Baldock Rail Users Group and the community more widely.  |
| Herts County Council                    | Mention complementary parking management measures in the policy itself (e.g. on-street parking restrictions), rather than in the supporting text.   | These are not measures that would be secured through planning decisions in applying Policy G1, so are more appropriately mentioned as part of the supporting text.   |
| N Herts District Council                | Objects to suggestion that part of employment area BE2 might be used for station parking; would need to show how this loss does not undermine the Local Plan's strategic employment aims, or could be offset, and the impact on car movements and journey patterns. | <b>Policy and supporting text amended</b> to make clear that any proposals to provide additional parking should be on a suitable site, taking into account the impact on highways access, residents and (in the case of BE2) employment land availability. The Neighbourhood Plan does not allocate any part of BE2 (or indeed any other site) for station parking – it simply notes that this is one possible location, and acknowledges that it would be an exception to Policy ETC1 in the new North Hertfordshire Local Plan. Full assessments of the appropriateness of any proposals would need to accompany a planning application. |
| Herts County Council                    | Any improvements in drop-off/pick-up facilities at Knights Templar School should focus on bus access and not private vehicles.  | The policy and supporting text make clear that any improvements that would be supported are those to improve safety, in particular to limit vehicular movements outside the school entrance.   |

**G2 Strategic green space**

22 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were two objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|   |   |  |
|---|---|--|
| 10806349679                               | Objects to using this land for playing pitches – need recreational areas suitable for all ages and genders, and this proposal could mean other existing pitches being lost.                   | <b>Policy and supporting text amended</b> to require community engagement in developing proposals for this land, and to make clear that a range of uses is possible. This land could be used in a variety of different ways to provide environmental and recreation benefits, and the Neighbourhood Plan does not attempt to determine the best approach; that is best considered through more detailed community discussions. |
| 10804303514                               | Need lots of trees.   |  |
| 10793164076                               | Could Walls Field be turned into a meadow?  |  |
| 10613272184                               | Wouldn't want the fields to become a park but open space to walk on would be fine.  |  |
| 10805937436                               | Make clear that no part of site BA3 should be visible from Walls Field, and that the allotment land will be protected.  | Requiring that no part of BA3 is visible from Walls Field could unreasonably limit development on land that is proposed for housing in the new North Hertfordshire Local Plan, although any views should be softened once landscaping is complete. The allotment land is protected as part of this policy and also the 'urban open land' designated in the new Local Plan.   |
| Herts County Council<br>Herts CC Property | A 50m strip of Walls Field may be needed to expand Hartsfield School, though most of this would not be built on (with Herts CC Property concerned that the policy does not allow this).       | The policy does not prevent all development; rather it requires the predominantly open character of this area to be maintained. Any development proposal would however need to take into account the presence of the scheduled monument.   |
| Historic England                          | Suggests a minor change to its wording to reflect the archaeological, rather than historic, interest of Walls Field.  | <b>Policy and supporting text amended</b> to refer to the conservation and interpretation of the scheduled area, rather than 'historic conservation'.  |
| 10804688941                               | Adequate and appropriate strategic green spaces should be included in all the new housing areas, with a new cemetery to the north of site BA1.  | The new North Hertfordshire Local Plan already proposes new or improved open space as part of new development, sufficient to meet the District Council's standards. A new cemetery could not be justified at the present time, as the District Council is investing in Wilbury Hills as a district-wide facility.  |
| Gladman<br>Developments                   | The policy requires more robust evidence of why this landscape and view are special, to avoid inconsistencies in decision-making. Protection should not be based solely on community support. | <b>Supporting text amended</b> to make clear in a footnote that the value of views from this area is identified in the North Hertfordshire Green Infrastructure Plan, as is the importance of this area of strategic green space.  |

**G3 Creating well-designed places (formerly Policy E3)**

24 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were no objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

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| 10804688941              | Landscaping should be a feature of all proposed housing developments  | The Design Guidelines identify ways in which landscaping can be incorporated in new development, while specific landscaping requirements are set out in policies E5 to E7.   |
| 10804303514              | All residential areas should be built with premises for small shops and cafes on their street corners.  | It is difficult for planning policies to influence this, as the location of retail and catering outlets is driven mainly by commercial decisions, and policies also need to consider the viability of proposed development (including residential). The new North Hertfordshire Local Plan contains a requirement for new retail space on site BA1, in view of its size and distance from other facilities.                        |
| 10793164076              | Ample off-street parking and design should be in line with Baldock's history as a centre of brewing and coach houses.   | The Design Guidelines illustrate how parking can be accommodated.  |
| N Herts District Council | Delete specific reference to Hertfordshire Design Review Service.   | <b>Supporting text amended</b> to delete specific reference to the Hertfordshire Design Review Service, as it is accepted that other design review services could be used.   |
| Gladman Developments     | The policy wording should be more flexible to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone, as so as not to affect the viability of proposed residential developments, nor preventing or discouraging appropriate innovation or change. | Policies should be clearly written and unambiguous, as the National Planning Policy Framework (para 16d) requires. Policy G3 and the supporting Design Guidelines do not impose prescriptive aesthetic requirements, and are unlikely to affect the viability of proposed development, for the reasons set out in section 5.2 of the Design Guidelines and pages 52-53 of the Basic Conditions Statement contained in this report. |

**G4 Sustainable design (formerly Policy G3)**

23 responses supported this policy; 11 had no opinion or did not say whether they supported or objected; and there were no objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

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| 10805937436<br>10804303514<br>10712148328 | Go further to require particular climate change mitigation and adaptation measures, such as reflective surfaces, communal heating systems, solar panels, heat pumps, electric vehicle charging, water collection/storage and sustainable urban drainage. | It is important that any new development is as sustainable as possible, but the Neighbourhood Plan has to focus on what can be achieved through the planning system. Matters to do with building construction are controlled |
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| 10804688941                | Require aesthetically acceptable sources of renewable energy and energy conservation measures in all new homes. | mainly through the building regulations, which set mandatory national standards, and are set to be tightened.  |
| 10785796398                | Specific standards need to be set and enforced during each stage of new development.                            |  |
| 10805937436                | Remove permitted development rights that allow the loss of permeable surfaces.                                  | Permitted development rights are set nationally, and cannot be varied by the Neighbourhood Plan.   |
| 10802960680<br>10613272184 | Photovoltaic panels can look ugly / disapprove of solar panels.   | Policy G3 recognises this, and requires panels to be sited and designed so as to minimise their visual impact, where they are subject to planning control. |
| N Herts District Council   | Could delete the examples in the first sentence as they are covered by the supporting text.                     | It is important for the policy itself to signal the types of measures that will be supported.  |

### G5 Baldock conservation area (formerly Policy G4)

24 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were no objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

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|-------------------|---|---|
| 10805937436       | Development must reflect its surroundings rather than contrast with it.   | Policy G4 reflects the key legal requirements, which are about conserving or enhancing the conservation area, and it does not rule out contrasting or modern designs that are of high quality and meet the policy's requirements (as the supporting text makes clear).                      |
| Herts CC Property | The policy does not allow for the use of modern styles or materials, although the supporting text suggests this may be acceptable in some instances.                        |   |
| 10785796398       | Installation of solar panels by property owners should be allowed.  | The policy does not prevent the use of solar panels where appropriate.  |
| 10802960680       | Views to the Church from all directions are important.  | <b>Policy and supporting text amended</b> to refer to importance of maintaining key views of St Mary's Church.  |
| 10795823555       | How can protection of the conservation area be enforced?  | North Hertfordshire District Council is responsible for enforcing planning and conservation legislation and policy.   |
| Herts CC Property | Caveats such as 'where appropriate' or 'generally' should be added to the policy so that it does not pre-judge whether its principles are appropriate in all circumstances. | Policies should be clearly written and unambiguous, as the National Planning Policy Framework (para 16d) requires. Any other material considerations must also be taken into account when applying the policy, which allows for any situations where a different approach can be justified. |

**G6 Local heritage assets (formerly Policy G5)**

24 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were no objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

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| Historic England         | The policy could be strengthened by requiring the applicant to show that harm to the significance of these assets has been avoided where possible, and mitigated and fully justified where not possible.   | This point is addressed by Policy HE3 in the new North Hertfordshire Local Plan (which the Neighbourhood Plan does not seek to duplicate).  |
| N Herts District Council | The Neighbourhood Plan could identify local heritage assets in Bygrave and Clothall parishes.  | This would require a further phase of work, but could potentially be tackled in the future through an update to the plan.   |
| Herts County Council     | The policy should be made clearer as it seems to apply to locally important historic buildings only.   | The policy refers to local heritage assets generally, not just buildings, while the supporting text explains the assets to which it applies, including a historic garden.   |
| Herts County Council     | The map accompanying these policies (G4 and G5) should be renamed as it does not show undesignated heritage assets.  | The map shows buildings of local importance (undesignated heritage assets) as well as designated ones, so the title is appropriate.   |
| Herts County Council     | The plan should consider the historic environment holistically, including currently unknown heritage assets, showing how the Historic Environment Record has been used and making provision for a better understanding of heritage assets that have already been identified. | The plan focuses on issues which it is felt will add most value to the policies in the new North Hertfordshire Local Plan. This Evidence Report, and the Neighbourhood Plan itself, explain the basis for the policies. |

**E1 Transport and air quality**

22 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were two objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|                            |  |   |
|----------------------------|--|---|
| 10804303514<br>10805937436 | Question whether the policy can be enforced (10805937436 refers specifically to bus services and information on sustainable travel). | These are common requirements for large developments, and can be secured using a section 106 legal agreement. |
| 10805937436                | Need strict routes and timings for construction traffic during development phase.  | Addressed by Policy E3.   |
| 10793164076                | Prohibit heavy good vehicles using A507 through Baldock and reroute through bypass.  | Heavy vehicle restrictions on the A507 through Baldock are being implemented by Hertfordshire County Council. |
| 10793164076                | Increase provision of cycle paths and pedestrian crossings and pedestrian only areas.  | The policy addresses the importance of creating walking and cycling routes to serve the new developments.     |

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| 10773748773<br>10730068645 | Strengthen the policy by changing 'severe' [impact on the local road network] to 'negative' i.e. the new developments should be designed to improve traffic or be traffic neutral.  | This is a desirable change in principle, but would conflict with national planning policy.   |
| Herts County Council       | Query reference to Whitehorse Street/Station Road crossroads, as one junction on its own is unlikely to result in a 'severe' impact on the local road network. Suggest greater alignment with the National Planning Policy Framework (NPPF) which states "All developments which generate significant amounts of movement should be required to provide a Travel Plan." | Because the Whitehorse Street/Station Road junction is such a key node within Baldock's transport network – and one that already causes considerable traffic delays affecting surrounding roads – it is considered that there would be a 'severe' impact if it were to have to operate significantly above its design capacity. The NPPF reference to travel plans is unrelated to this, as it is a general requirement relating to developments which generate significant amounts of movement. |
| N Herts District Council   | Question whether the policy is intended to apply only to sites BA1-BA4 and BA10 in the North Hertfordshire Local Plan   | The policy does apply only to these sites, as it is concerned with helping to manage the transport and air quality impacts of the urban extensions proposed in the North Hertfordshire Local Plan.   |
| N Herts District Council   | The Policy and supporting text appear to neglect opportunities for improving sustainable transport modes to Bygrave, Clothall and Letchworth.   | The policy is concerned with the urban extensions and their impact, not wider opportunities for transport improvements (and the plan seeks to avoid duplicating other plans and strategies prepared by the District and County Councils). Proposals relating to Bygrave village are contained in Policy E5.  |
| Herts County Council       | The plan does not include bus priority measures as a traffic management solution to reduce congestion and pollution.  | Bus priority measures and wider traffic management options are more appropriately addressed through other plans and strategies prepared by the District and County Councils.   |

## E2 Green infrastructure and outdoor recreation

25 responses supported this policy; 9 had no opinion or did not say whether they supported or objected; and there were no objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|                            |  |  |
|----------------------------|--|--|
| 10805937436                | Point g (overlooking of play/recreation areas) does not work for those living on a green corridor due to disturbance and impacts on privacy.           | <b>Policy amended</b> to make clear that this should be done in a way that does not have an unacceptable impact on the amenity of occupiers.                             |
| 10804688941<br>10804303514 | Create more tree cover around and within the town to improve its setting and/or support carbon reduction, noise attenuation and leisure opportunities. | <b>Policy and supporting text amended</b> to include additional references to the importance of increasing tree cover.   |
| 10613272184                | Build fewer houses and preserve the green space we have - not create it.   | The Neighbourhood Plan cannot restrict the overall number of homes proposed in the new North Hertfordshire Local Plan, which is part of the latter's strategic policies. |

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| N Herts District Council | Policy appears to contradict statement on page 5 about the Local Plan not making suitable provision for open space and recreation, as the policy refers to making provision that reflects or exceeds NHDC standards. | <b>Text on page 5 amended</b> to make clear that it refers to making specific provision for open space and recreation.   |
| N Herts District Council | Amend policy title to include sport and recreation.  | <b>Policy title amended</b> to 'Green infrastructure and outdoor recreation'.  |
| Herts CC Property        | Reference to 'net benefits' is unclear: it does not describe what this constitutes or how it may be measured, and so may not be implementable.   | The supporting text explains this, while the concept of net benefits is well established in national planning policy (National Planning Policy Framework para 8); particularly in relation to net environmental gains (NPPF 118a) and net gains for biodiversity (NPPF 170d and 175d). Natural England publish a metric for calculating biodiversity gains and losses.   |
| Herts CC Property        | Reference to drainage (part b of the policy) should be clarified as referring only to applications for detailed permission, and should not prescribe what form of drainage would be acceptable.                      | It is unnecessary to state that E2b applies only to applications for detailed permission, as all of the policies in the Neighbourhood Plan (and indeed the development plan generally) will apply only insofar as they are material to particular proposals. The new North Hertfordshire Local Plan expects sustainable drainage features to be used to help manage surface water and flood risk, and indeed they feature prominently in the drainage strategies proposed by the County Council in its applications for the sites in its control. This aspect of the policy has been supported by Anglian Water in their comments on the draft Neighbourhood Plan. |
| Gladman Developments     | The policy wording should be more flexible. Planning policies should not be overly prescriptive, as they need to respond to site specifics and the character of the local area.                                      | Policies should be clearly written and unambiguous, as the National Planning Policy Framework (para 16d) requires. Any other material considerations must also be taken into account when applying the policy.   |

### E3 Managing construction impacts (formerly Policy E4)

22 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were two objections (although these were expressed in terms of support and wanting the policy to go further). A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|   |   |  |
|---|---|--|
| 10805937436                               | Add restrictions on hours of operation to part a of the policy.   | Restrictions on hours of operation are included in the policy.   |
| 10773748773<br>10730068645<br>10793164076 | Construction traffic should not have an adverse effect on traffic flow in the town (e.g. include a requirement that it should not use the roads at peak times). | <b>Policy amended</b> to reflect the importance of not adding to congestion (this may not require peak hour restrictions, if appropriate routes are used). |

**E4 Building strong communities (formerly Policy E5)**

22 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were two objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|                            |   |  |
|----------------------------|---|--|
| 10793164076                | Community centres are especially important, especially when most people are commuters.  | The policy highlights the importance of providing community facilities that are needed as early as possible. The new North Hertfordshire Local Plan and Policy E5 in the Neighbourhood Plan require suitable indoor community facilities on site BA1, while Policy E7 in the Neighbourhood Plan supports additional indoor and outdoor community facilities in association with sites BA2 and BA3.   |
| 10785796398                | Community involvement should extend to finding ways of local energy production/storage/distribution.  | Local energy production/storage/distribution is outside the scope of this Neighbourhood Plan, although it is agreed that this is something that could be pursued separately.   |
| 10773748773<br>10730068645 | The Neighbourhood Plan should promote a community hall with a capacity on a par with the size of the expanded town, such as 300 people, as otherwise venues will be too small for some groups (e.g. Christchurch); or alternatively seek funding to expand existing facilities. | What can be sought from development is limited to facilities that are necessary to make the development itself acceptable in planning terms, rather than things that could address wider capacity issues, unless this is offered voluntarily or funding is available from elsewhere (something which is outside the scope of the Neighbourhood Plan). The new secondary school required as part of site BA1 may however provide scope to secure a large multi-purpose space for community use. |
| 10745210672                | Unclear how the policy will be enforced.  | Compliance with the policy will be achieved through the evidence required accompany relevant planning applications, and through any section 106 legal agreements made alongside approved schemes.  |
| N Herts District Council   | Amend “pre-application discussions” to “early discussions” to avoid confusion with confidential pre-application discussions between a developer and the local planning authority.   | <b>Policy amended</b> to refer to ‘early’ discussions.   |
| Herts CC Property          | Modify part (a) of the policy to read “involve local residents”, rather than “involving both existing and new residents”, as we can’t be sure who the new residents will be.  | <b>Policy amended</b> to make the reference to new residents clear (this relates to recently arrived residents, who can be involved in discussions about future phases of development, once they are living in Baldock).   |

**E5 Development north of the railway (formerly Policy E6)**

21 responses supported this policy; 10 had no opinion or did not say whether they supported or objected; and there were three objections (although two of these were expressed in terms of support and wanting the policy to go further). A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|                            |  |  |
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| 10804688941                | Provide compensation to avert the impact of development on wildlife.   | Policy E2 covers the need to provide net benefits for nature as a result of this and other proposals to expand Baldock contained in the new North Hertfordshire Local Plan.  |
| 10804303514                | Environmental and visual effects must be softened by significant tree planting: i.e. woodland, not just 'landscape buffers'.               | <b>Policy and supporting text amended</b> to make clear the importance of appropriate landscaping between Bygrave and the expanded edge of Baldock, and also where site BA1 abuts the existing residential area around Salisbury Road/Larkins Close.   |
| 10795823555                | Can the working farmsteads on Bygrave Road be retained so the farmers are not thrown out of their homes and businesses?                    | The Neighbourhood Plan cannot control business decisions made by the landowners (Hertfordshire County Council), but Policy E5 does set out the importance of retaining the houses that are a distinctive feature of these farmsteads, and an important part of the site's history and character.   |
| 10773748773<br>10730068645 | Would like to see a more specific requirement for indoor recreation facilities, towards a multi-functional hall with capacity to seat 300. | What can be sought from development is limited to facilities that are necessary to make the development itself acceptable in planning terms, rather than things that could address wider capacity issues, unless this is offered voluntarily, or funding is available from elsewhere (something which is outside the scope of the neighbourhood plan). The new secondary school required as part of BA1 may however provide scope to secure a large multi-purpose space for community use. |
| 10773748773<br>10730068645 | Can the policy require the link road to be suitably sized to avoid a negative impact on Station Road?                                      | Measures to help avoid adverse impacts on the local highway network are contained in Policy E1. The appropriate size of the link road is something that will need to be determined through detailed highway modelling to inform planning applications, which will need to take planning policies into account.   |
| 10739623979                | To minimise the impact on Bygrave, BA1 needs to be reduced in size so it is proportionate to the current size of Baldock.                  | The Neighbourhood Plan cannot restrict the overall number of homes proposed in the new North Hertfordshire Local Plan.   |
| 10613272184                | Too many houses are being proposed north of Baldock.   |  |
| 10739623979                | Bygrave residents should continue to have good access to Baldock (road, cycle and walking) throughout construction and afterwards.         | Policy E5 requires improved pedestrian and cycle access between Bygrave and Baldock, and Bygrave will continue to have road access to Baldock; but at the same time it is important to avoid highway solutions that result in significantly more traffic through Bygrave (which is reflected in the safeguards set out in this policy).  |

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| Letchworth and Baldock District Scout Council | A single community building on site BA1 would be insufficient to accommodate the needs of scouting/guiding when shared with other community groups, so land should be made available for a suitable additional building as and when needed.  | <b>Policy and supporting text amended</b> to make clear that new community facilities on this site should offer sufficient capacity and flexibility to meet the additional needs generated by the development, including groups such as scouts and guides.  |
| 10766493505<br>10739623979                    | Concerned that 250m between Bygrave and the new development could be too small a gap.  | <b>Policy and supporting text amended</b> to make clear the role which the gap between Baldock and Bygrave needs to perform, the minimum size of gap necessary to achieve this and the additional benefits if a 250m gap can be secured. These changes reflect the findings of a landscape and visual survey commissioned by the Baldock, Bygrave and Clothall Planning Group in the light of the comments received on the draft Neighbourhood Plan. As the revised text in the Neighbourhood Plan indicates, it is considered that the minimum 170m gap can be achieved without reducing the overall developable area, and so would not compromise the plan's general conformity with the strategic policies in the new North Hertfordshire Local Plan (once adopted). It is appropriate for the Neighbourhood Plan to suggest minimum and desirable sizes for the gap based on the evidence contained in the landscape and visual survey. The latter also shows how the smaller gap proposed by Herts CC Property would not secure effective integration of proposed site BA1 into the landscape, nor a sympathetic transition from Baldock to Bygrave. |
| N Herts District Council                      | The proposed 250m buffer is more restrictive than Policy SP14 in the emerging Local Plan, and would reduce land available for development by 3 to 3.5ha. Need justification for the gap and to demonstrate it does not conflict with the Local Plan's proposals for 2,800 homes and associated infrastructure on this site.  |   |
| Herts CC Property                             | Remove reference to a specific size of gap, which is arbitrary and better determined through a planning application. A document appended to their representation sets out how a smaller gap could be appropriate. The landscape study referred to in the policy's supporting text (which references keeping development below the ridgeline that crosses Ashwell Road south of Lower Bygrave) is diagrammatic. |   |
| N Herts District Council                      | Part (b) of the policy [relating to impacts on longer-distance views] could be easier to read, and would be clearer if views were shown on a map and text from the Design Guidelines included.   | <b>Policy and supporting text amended</b> to clarify the key views which this relates to, and also to make clear that this relates more to views from Bygrave than from Baldock (which follows further research on the views which are most likely to be affected by site BA1, in response to this representation).   |
| Herts CC Property                             | Amend part (c) of the policy so that it refers to retaining existing landscape features "where possible", and omits reference to retaining built features including the cottages on Bygrave Road.  | Policies should be clearly written and unambiguous, as the National Planning Policy Framework (para 16d) requires. This does not preclude any other material considerations from being taken into account when applying the policy. The houses on Bygrave Road are considered to be an important part of the site's history (as part of the Hertfordshire Rural Estate) that could be incorporated within the proposed development.   |
| Herts CC Property                             | Description of the houses on Bygrave Road as 'cottages' is misleading.   | <b>Policy and supporting text amended</b> to refer to 'houses', and to explain the importance of these properties as part of the features which it is desirable to retain.  |
| N Herts District Council                      | Part (d) of the policy [relating to improved pedestrian and cycle access between Bygrave and Baldock] would be clearer if text from the Design Guidelines was reflected or included.   | <b>Policy and supporting text amended</b> to improve alignment with the Design Guidance, although neither document is intended to be prescriptive in requiring that Bygrave Road/Ashwell Road is used as a pedestrian and cycle route only (the Design Guidelines simply note that it could be used in this   |

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|                          |   | way). It is possible that limited vehicular access could be maintained, which the revised supporting text also makes clear.   |
| N Herts District Council | There may be insufficient evidence from traffic modelling to justify any measures to address perceived increases in traffic flows through Bygrave.                                    | The policy refers to the importance of addressing <u>potential</u> increases in traffic through Bygrave. The Transport Assessment accompanying Hertfordshire County Council's initial planning application for site BA1 (application 17/04420/OP) estimated that nearly 2,000 external trip movements would be generated by the site in the morning peak, which would make use of just three access points, including one with Ashwell Road close to Lower Bygrave. While most trips from the site would be likely to use the proposed link road to access either the A505 or the A507, it is inconceivable that there is no possibility of some increase in traffic flows through Bygrave (and no evidence has been provided by the District or County Councils to the contrary). Consequently, it is important that steps are taken to minimise this potential impact due to the rural character of Bygrave and of Ashwell Road running through it. |
| Herts CC Property        | Reference to gateways and signage in part (e) of the policy is inappropriate as it is not within the control of a planning application.   | If such measures are necessary to make the development of site BA1 acceptable in planning terms, then they could be secured by means of a section 106 agreement attached to the planning permission.  |
| N Herts District Council | Delete reference to a community hall being suitable for meetings of Bygrave parish council, as it is too specific (the hall should be sufficiently flexible for any community group). | <b>Policy amended</b> to make clear that the community hall should be capable of meeting the needs of local groups generally, such as Bygrave Parish Council. A reference to the Parish Council is important, as the development lies mainly within its area, and there is currently no meeting place that would be suitable for meetings of the Parish Council once the population has expanded by the amount proposed. Hence it is reasonable to expect the community hall to be capable of addressing this need, if the development of site BA1 is to be acceptable in planning terms. It cannot be assumed that parish boundary changes will necessarily occur (or, if they do, when this would be).  |

**E6 Royston Road (formerly Policy E7)**

23 responses supported this policy; 11 had no opinion or did not say whether they supported or objected; and there were no objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

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| 10804491906       | The Royston Road approach to Baldock is very open and needs to be developed very sensitively.   | This is the objective of the safeguards set out in the policy.  |
| 10804491906       | The existing properties must be protected against noise and air pollution from the industrial development proposed around them.   | The new North Hertfordshire Local Plan which proposes site BA10 for employment uses already requires adequate mitigation measures for noise associated with the railway line and commercial activity, while Policy E1 in the Neighbourhood Plan addresses the potential risk of air pollution.  |
| 10805937436       | Include hours of operation as a consideration to reflect surrounding residential area of Clothall common.   | This should be addressed through the new Local Plan’s proposed safeguards relating to noise mitigation.   |
| 10785796398       | The policy should not be at the expense of ‘green’ issues – photo voltaics, water and energy use, etc.  | The policies in the Neighbourhood Pan need to be read as a whole, alongside those proposed in the new North Hertfordshire Local Plan. Other policies deal with the environmental performance of development and would, where relevant, also apply to development proposals affecting Royston Road.  |
| 10804688941       | The policy could be applied to the North Road and A507 gateway and that coming into the town from the south.  | Policy E7 is designed to deal specifically with the major development proposed either side of Royston Road in the new North Hertfordshire Local Plan, and to reflect the particular characteristics of this road and the mix of proposed development.   |
| 10613272184       | Clothall Common should not be opened up to Royston Road through a new road.   | The proposal for a southern link road is contained in the new North Hertfordshire Local Plan, but it does not suggest that this would entail linking the existing built-up area of Clothall Common to Royston Road through a new vehicular access. The detailed designs for each site proposed in the new Local Plan will need to consider the most appropriate highways access points and routes for pedestrians and cyclists. |
| Herts CC Property | Question use of “relate sensitively” in part b of the policy, as it has connotations with protecting heritage assets (which the houses are not). Suggest using appropriate relationship in terms of scale, massing and landscaping instead. | It is considered that the policy is sufficiently clear; it is not couched in terms of the protection of heritage assets.  |

**E7 Cambrai Farm and south of Clothall Common** (formerly Policy E8)

23 responses supported this policy; 11 had no opinion or did not say whether they supported or objected; and there were no objections. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|                          |  |   |
|--------------------------|--|---|
| 10805937436              | Maintain the Old Wallington Road link over the bypass as part of a green corridor to Wallington, as it is important for walking and cycling and used for the Baldock Beast half marathon.  | There are no proposals to remove this – the bridge carries an existing bridleway and is not directly affected by the development proposals in the new North Hertfordshire Local Plan.   |
| 10805937436              | Any southern distributor road should have traffic calming measures to limit speed and discourage rat running between Royston Road and the A507.  | This will be a matter for the detailed highway design, which could include appropriate speed restrictions, although the road would need to fulfil its purpose, which is in part to provide an alternative route between Royston Road and the A507 avoiding the town centre.   |
| 10804303514              | Important to incorporate trees, e.g. as a community orchard or memorial woodland.  | Policy E2 which would apply to these sites has been amended to emphasise the importance of increased tree cover.  |
| Herts CC Property        | It is not necessarily appropriate to create a landscape buffer between BA2 and the Hillside Park mobile home site, so this should not be included as a policy requirement.   | The Environmental Impact Assessment prepared on behalf of Hertfordshire County Council to accompany its initial planning application for site BA2 (application 17/04417/OP) notes that development here would have a major, adverse and significant effect on the views available to existing residents of the mobile home site. In that context is it appropriate to require suitable reinforcement of the planting in this location, as Policy E7 provides for.   |
| N Herts District Council | The policy should be more flexible as the 'corridor' to the east of Aley Way and Merchants Walk might be able to accommodate the required link road and some development.  | <p><b>Policy and supporting text amended</b> to more clearly delineate the area to be protected from buildings, provide a fuller reasoned justification and make clear that the policy does not preclude the construction of the link road proposed in the new North Hertfordshire Local Plan. The inclusion of this land within site BA3 in the new North Hertfordshire Local Plan carries no implication that all of it is suitable for development. The amendments to policy E7 explain that there are several reasons why building on the raised land that it refers to would be inappropriate.</p> <p>Its ownership by Hertfordshire County Council does not take away from its current and potential recreational value. The Neighbourhood Plan survey conducted early in 2018 showed that almost three quarters of respondents used the area for recreation at least occasionally, with more than 30% using it most days or weeks.</p> <p>There is substantial first-hand and photographic evidence that the raised land was formed from material deposited during the construction of the</p> |
| Herts CC Property        | The proposed restriction on new buildings on part of BA3 (and the plan on page 29 of the consultation draft of the Neighbourhood Plan) is at odds with the emerging Local Plan, misleading and not supported by evidence. The elevated part of BA3 has limited recreational value as it is private land (apart from one public right of way), and no evidence is provided that the land is potentially unsuitable for building due to instability. It is more appropriate for a planning application to set out what may be suitable in relation to visual impact. |   |
| 10795823555              | The "higher ground immediately south of Royston Road" is spoil from the bypass, some of which covers the site of the medieval leper hospital of St. Mary Magdalene; the policy should require an archaeological excavation if any attempt is ever made to build on it.   |   |

|  |  |  |
|--|--|--|
|  |  | <p>Baldock bypass, which is less than 15 years ago. It cannot be assumed that this made land is sufficiently stable for development.</p> <p>The District Archaeologist has confirmed that the remains of a leper hospital lie beneath part of the site, but towards the roundabout with Royston Road. Policy E7 does not require an archaeological investigation as it seeks to prevent development in this area.</p> <p>It is not inappropriate for the Neighbourhood Plan to take a view about the potential visual impact of development on the raised land, given the prominent slope that exists. In addition, the Environmental Impact Assessment prepared for Hertfordshire County Council to accompany its initial planning application for this site (application 17/04417/OP) concluded that building to the east of Aleyn Way would have a “major, adverse, significant” visual effect for residents of Aleyn Way.</p> <p>Additional photographic and other supporting evidence relating to this site is appended to this consultation analysis on pages 48-49.</p> |
|--|--|--|

**V1 Bygrave village**

20 responses supported this policy; 13 had no opinion or did not say whether they supported or objected; and there was one objection. A number of responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|             |   |  |
|-------------|---|--|
| 10804688941 | Provide a tree line between Baldock and Bygrave village to emphasise their separate nature.   | Policy E5 requires appropriate planting at the edge of site BA1, between it and Bygrave, to help maintain a sense of separation between Baldock and Bygrave.   |
| 10799882468 | Would like street lighting as I am a senior citizen, but understand Bygrave residents wanting to keep the character of their village. | There are good arguments both for and against street lighting in rural areas, and the needs of older people have been taken into account in preparing this policy. Equally, there were strong views expressed while preparing the plan that suggested many Bygrave residents saw a lack of street lighting as an important part of Bygrave’s rural character. On balance, and taking into account both points of view, we have decided that the policy should continue to resist the introduction of street lights due to their urbanising effect. |
| 10739623979 | Object to size of BA1, as it fails to protect the rural character of Bygrave.   | The Neighbourhood Plan cannot restrict the overall number of homes proposed to in the emerging North Hertfordshire Local Plan, and needs to be in general conformity with strategic policies such as this.   |

**V2 Clothall and Luffenhall**

20 responses supported this policy; 13 had no opinion or did not say whether they supported or objected; and there was one objection. Two responses commented on the policy. Those comments that implied a potential change to the policy are summarised below.

|             |  |   |
|-------------|--|---|
| 10805937436 | Provide for a bridge over the A507 at the junction with Clothall and Quickwood to introduce a cycle link with Baldock via Bird Hill. | This is desirable in principle. However, it is not something that the Neighbourhood Plan could require given the likely level of use, and the available evidence of traffic impacts arising from the developments proposed in the new North Hertfordshire Local Plan.   |
| 10739623979 | The Neighbourhood Plan protects Clothall and Luffenhall at the expense of Bygrave.   | The Neighbourhood Plan does not promote any development affecting Bygrave, which arises instead from proposals in the new North Hertfordshire Local Plan. What the Neighbourhood Plan does seek to do is put additional safeguards in place so that the impact of the new Local Plan on Bygrave is minimised. There is no question of protecting Clothall and Luffenhall at the expense of Bygrave. |

**Design guidelines**

We asked whether those responding had any comments on the Design Guidelines. Ten did have comments, and those that implied a potential change to the Design Guidelines are summarised below.

|             |  |   |
|-------------|--|---|
| 10804688941 | There should be a policy enshrining the guidelines and requiring all new developments to give due consideration to them. | <b>Policy and supporting text amended</b> , and moved to the set of general policies. The Design Guidelines set out some general principles that are applicable to all developments, as well as guidelines that apply specifically to some of the sites proposed for development in the new North Hertfordshire Local Plan. Therefore, it is correct that a policy in the Neighbourhood Plan should apply the guidelines to development generally. This and other policies have been renumbered to accommodate this change. |
| 10804303514 | Reflect the importance of trees.   | The way that trees can be accommodated is noted at various points in the document. The importance of increasing tree cover is also now highlighted in Policy E2.  |
| 10795823555 | Important not to waste land through unused verges and spaces.  | Land does need to be used efficiently, and the Design Guidelines reflect this. There will be some situations where green strips such as verges can play a useful role, such as providing space for street trees and helping manage surface water.   |

|                          |  |   |
|--------------------------|--|---|
| 10795823555              | Developers should be encouraged to copy or replicate traditional period house styles suitable for an estate but not to produce pastiche.   | The Design Guidelines set out important features of local character and materials that are expected to be reflected in new development, but do not prescribe particular architectural treatments. This will help to avoid new development resorting to pastiche, while also allowing the creation of places that are locally distinctive.   |
| 10760525926              | Questions whether the link road through site BA1 will be a 'boulevard' as section 3.2 suggests, given that it will connect to a dual carriageway and the memorandum of understanding with Network Rail mentions a dual carriageway bridge. | The exact route and function of the link road would need to be determined as part of the detailed planning of site BA1, but the Design Guidelines suggest a way in which it could be designed to strike a balance between its role in carrying traffic and the importance of creating an attractive environment for residents.  |
| 10613272184              | Vital not to open up the old Wallington Road behind Clothall Common, as this would create a dangerous rat run.   | The new North Hertfordshire Local Plan proposes to maintain the old Wallington Road as a bridleway and green corridor.  |
| N Herts District Council | The Design Guidelines are not very specific to the allocated sites in Baldock, particularly in relation to the urban extensions.   | The Design Guidelines focus on the most critical issues, including broad place-making principles, the treatment of development edges and appropriate materials. They are not an attempt to set out a detailed code for the allocated sites, which would require far more resources than are available to the group, and potentially duplicate the detailed design work that consultants for the County Council have been progressing. |

### Other suggestions

We asked whether those responding had any other comments to make on the draft Neighbourhood Plan. Sixteen did have comments, many of them expressing support for the document. Those comments that implied a potential change to the plan are summarised below.

|                          |   |  |
|--------------------------|---|--|
| N Herts District Council | Page 5, 1 <sup>st</sup> paragraph – consider deleting reference to likely phasing of development, as this may change.   | <b>Text amended</b> to remove reference to a specific order of site phasing.   |
| N Herts District Council | Page 5, 3 <sup>rd</sup> paragraph – could be misleading by implying that the link roads required by the Local Plan are aimed at helping to take traffic away from the town. | <b>Text amended</b> to make clear this refers to limiting the impact of growth on traffic in the centre of the town.   |
| Herts CC Property        | Proposals map on page 5 should have a title/reference, and this and other maps should reflect the currently proposed boundary of site BA2.                                  | <b>Map amended</b> to reflect the currently proposed boundary of site BA2. The map already has a title, and is not a 'proposals map' for the Neighbourhood Plan, as it refers instead to allocations proposed in the new North Hertfordshire Local Plan. |
| Herts CC Property        | Statement on page 6 that the provision of facilities on site BA1 could help to create a town of two halves is misleading, as the  | <b>Text amended</b> to acknowledge the fact that the facilities proposed for site BA1 in the new North Hertfordshire Local Plan will be more limited than  |

|                      |   |   |
|----------------------|---|---|
|                      | facilities will be local in nature. Baldock town centre will be the focus for a significant majority of retail and leisure expenditure.   | those in the town centre. This does not, however, mean that the statement about creating a town of two halves is misleading; this is a clear risk in physical and perceptual terms, for the reasons set out in the paragraph.   |
| Herts County Council | References to new primary schools should include nursery provision, as it is intended to provide this as part of these schools. HCC would also be interested in providing a pre-school/day nursery in the community building on site BA1.         | Provision for new schools is made in the new North Hertfordshire Local Plan, rather than the Neighbourhood Plan. A pre-school/day nursery could potentially be provided within the community facilities which the new Local Plan and Policy E5 require for site BA1.  |
| Herts County Council | Herts Fire and Rescue Service would want to be consulted on water supply provision (including sprinklers) in relation to new development.   | This needs to be addressed by the applicants and North Hertfordshire District Council through pre-application discussions and consultation on specific development proposals.   |
| 10804688941          | Small businesses should be provided with discrete building space (e.g. a business centre) in the proposed industrial area.  | This is desirable in principle. However, the Neighbourhood Plan has not attempted to address the mix of commercial floorspace to be provided, as this would require further research and evidence which has not been possible with the resources available to us currently. It could potentially be tackled in the future through an update to the plan.  |
| 10802960680          | Major concern is the impact of additional car movements, the impact of joining the A505 and A507 (particularly for Bygrave and Ashwell) and the suggested closure of Ashwell Road which is ill-conceived and impractical.                         | It is important that the impact of growth on the road network is fully addressed, which needs to be done through a combination of planning policies and the detailed work to prepare and assess planning applications. The Neighbourhood Plan attempts to do as much as it reasonably can in setting out additional safeguards.   |
| 10793164076          | Need to focus on the infrastructure required to support growth (including cycle paths, adequate off-street parking and room for buses), and design that reflects Baldock's history as a centre of brewing and crossroads for travellers.          | Providing adequate infrastructure and design that reflects Baldock's character are important objectives of the Neighbourhood Plan, and are reflected in many of its policies. However, these must not be read in isolation, as additional policies relating to infrastructure and design are set out in the new North Hertfordshire Local Plan.   |
| 10785796398          | Need a policy on local energy production and water storage, conservation, and distribution. The new developments will need significant resources – and even if they didn't, we need to transition to fossil-free and locally sustainable options. | This is desirable in principle. However, the Neighbourhood Plan has not attempted to address all aspects of planning for a more sustainable future, partly because the new North Hertfordshire Local Plan addresses some issues, but also because producing more extensive policies for the Neighbourhood Plan would require further research and evidence which has not been possible with the resources available to us currently. It could potentially be tackled in the future through an update to the plan. |

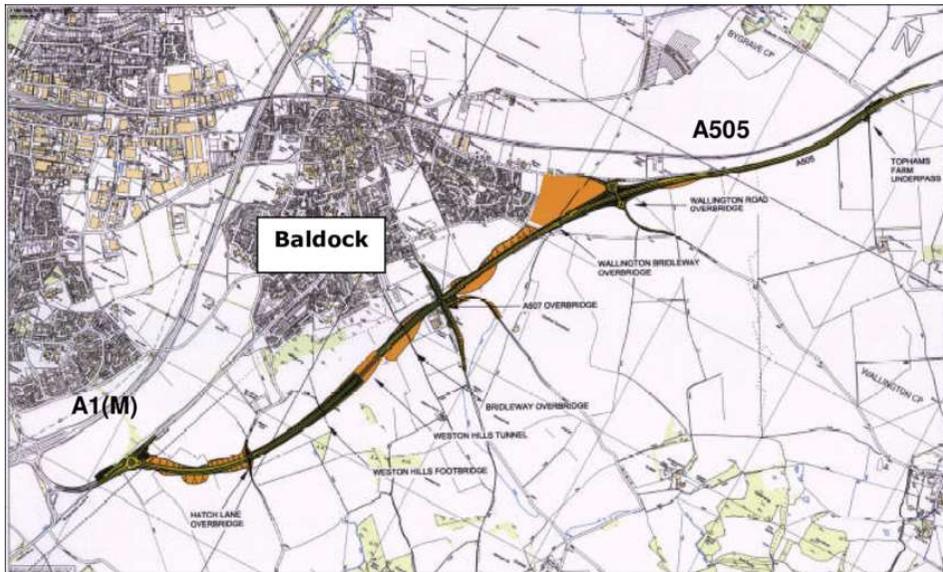
**Policy E7: Additional supporting evidence**



View from north end of Aley Way towards the raised ground immediately to the east, illustrating how the land rises quite steeply (as a result of which, development on this raised area would not be sympathetic to the landscape setting and would be likely to have an overbearing effect on houses in Aley Way and Merchants Walk). Image © WYG for Hertfordshire County Council.



View looking south from between Aley Way (to the right) and the raised land to the left, showing the 'corridor' of relatively flat ground between the two. Image © Baldock, Bygrave and Clothall Planning Group.



The land to the east of Clothall Common formed part of the scheme of works for the construction of the Baldock Bypass (top left; image © Hertfordshire County Council). The image above illustrates chalk being deposited on the land east of Aley Way during construction (image © Laurence Brown). This land remains heavily-used for recreation, as the network of informal paths crossing it in this image from 2017 shows (left, imagery © Google).

## Basic Conditions Statement

This basic conditions statement has been prepared by the Baldock, Bygrave and Clothall Planning Group, to accompany the submission of the draft Baldock, Bygrave and Clothall Neighbourhood Plan to North Hertfordshire District Council under regulation 15 of the Neighbourhood Planning (General) Regulations 2012, as amended.

The Neighbourhood Plan has been submitted by Bygrave Parish Council, which is the qualifying body authorised to act in relation to the Neighbourhood Area under section 61E(6) of the Town and County Planning Act 1990, as amended (“the 1990 Act”). The Neighbourhood Area comprises the parishes of Bygrave and Clothall and the unparished area of Baldock. The Neighbourhood Area was designated by North Hertfordshire District Council on 25 July 2017.

The draft plan relates to planning matters (the use and development of land) in the designated Neighbourhood Area and covers the period from 2018 to 2031. It does not contain policies relating to excluded development as set out in section 61K of the 1990 Act. There are no other neighbourhood plans in place within the Neighbourhood Area.

Most of the remainder of this statement addresses each of the other relevant basic conditions set out at paragraph 8(2) of Schedule 4B to the 1990 Act:

- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan
- the making of the plan contributes to the achievement of sustainable development
- the making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the local planning authority (or any part of that area)
- the making of the plan does not breach, and is otherwise compatible with, EU obligations

A final section addresses equalities considerations. While these do not form part of the basic conditions that need to be satisfied, there are legal requirements which apply and so it is appropriate to consider these as part of this statement.

### Approach to considering national policy and guidance

Neighbourhood plans should be appropriate having regard to national planning policy and guidance. The principal point of reference for this is the National Planning Policy Framework (the NPPF)<sup>1</sup>, as the purpose of the online planning guidance suite is to provide advice on how the Framework should be applied.

The NPPF provides a broad framework for producing plans at the local level, and so there is scope for neighbourhood plans to contain policies and proposals that are not expressly covered by the NPPF. However, policies that contradict the NPPF are less likely to satisfy the basic condition of being ‘appropriate’, unless the departure from national policy can be fully justified.

The Baldock, Bygrave and Clothall Neighbourhood Plan has been prepared with careful regard to the NPPF and its associated guidance. To illustrate this, and help demonstrate why it is appropriate to make the Neighbourhood Plan, Table 1 summarises how its constituent policies reflect the most relevant paragraphs in the NPPF.

More generally, the Neighbourhood Plan as a whole is intended to support the delivery of the strategic policies proposed in the new North Hertfordshire Local Plan (in line with NPPF paragraphs 13 and 29), with its policies providing additional safeguards to those in the Local Plan. In doing so, the Neighbourhood Plan aims to:

- contribute to sustainable development;
- provide a positive framework for the future, which has been shaped by early discussion with a wide range of interests;
- avoid unnecessary duplication of the policies in the new Local Plan; and
- contain policies that are clear and unambiguous.

(NPPF paragraph 16)

The Neighbourhood Plan contains a number of policies relating to sites which North Hertfordshire District Council proposes to remove from the Green Belt through its new Local Plan. The NPPF makes clear that it is only ‘strategic policies’ – such as

relevant policies in a Local Plan – that can establish the need for Green Belt releases. The Baldock, Bygrave and Clothall Neighbourhood Plan respects this principle, as it does not propose or endorse any changes to the Green Belt (as the preface to the Neighbourhood Plan makes clear). Where it contains policies relating to identified sites that are currently in the Green Belt, these policies will only have effect if and when the land is released for development as a consequence of the policies in the new North Hertfordshire Local Plan.

### Viability

Consideration has also been given to whether the policies in the Neighbourhood Plan could undermine the viability of the proposals in the new North Hertfordshire Local Plan (NPPF paragraph 34). This is unlikely for a number of reasons:

At a broad level, the policies in the new North Hertfordshire Local Plan (including the site-specific proposals within the Neighbourhood Area) have been assessed for their viability, concluding that values in North Hertfordshire “typically support a good level of development viability”<sup>2</sup>. The Neighbourhood Plan does not propose additional or alternative allocations, change the amount of development proposed or require significant new infrastructure to support the sites proposed for allocation.

Instead, the Neighbourhood Plan:

- Contains a number of policies that apply good planning principles to the circumstances of the Neighbourhood Area (such as responding to the important characteristics of the conservation area in new development, promoting good design that reflects the distinctive nature of the area and engaging communities in the development process). Because these are characteristics of good development, and supported by national policy, they should already be factored-in to development costs.
- Sets out limited additional safeguards to ensure that the development proposed in the new North Hertfordshire Local Plan is sustainable, in relation to the specific impacts of particular sites and the cumulative effect on the Neighbourhood Area. For example, some improved footpath and cycle

<sup>1</sup> Ministry of Housing, Communities and Local Government (2019) *National Planning Policy Framework*.

<sup>2</sup> Dixon Searle Partnership for NHDC (2016) *Local Plan Viability Assessment – Update*, page 5.

connections, strengthened landscape buffers and air quality monitoring in a limited number of locations. Given the scale of the sites and their potential impacts, these requirements should not be entirely unexpected, and their cost is likely to be very modest compared to the overall package of infrastructure needed for the sites' delivery<sup>3</sup>.

- Supports a small number of improvements that could be taken forward if circumstances allow, including limited additional station parking and the potential use of land between Hartsfield School and the A505 for recreation. These are not set out as requirements, and are only likely to be delivered if they are viable.

Land acquisition forms a significant element of the costs incurred in many developments, but all the sites proposed in the new Local Plan for development at the edge of Baldock have been in Hertfordshire County Council's long-term ownership. In addition, North Hertfordshire District Council has not implemented the Community Infrastructure Levy, which removes another potential cost that could otherwise be incurred. A draft of the Neighbourhood Plan was shared with the County Council at an early stage, so that its potential policies could be considered in developing proposals for the sites in its ownership.

National planning guidance makes clear that plans should take a proportionate approach to considering viability<sup>4</sup>. In view of the considerations outlined above, it is not considered that detailed viability testing of the Neighbourhood Plan's proposals is necessary.

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<sup>3</sup> For example, existing estimates of the overall cost of the green infrastructure needed to support the new North Hertfordshire Local Plan are very small compared to the contributions required for other service areas: see RS Regeneration for NHDC (2016; updated 2018) *Infrastructure Delivery Plan*.

<sup>4</sup> Planning practice guidance: Viability, paragraph 10-001-20180724

**Table 1: Relationship between policies in the Neighbourhood Plan and those in the National Planning Policy Framework**

| Neighbourhood plan policies |   | Key paragraphs in the NPPF 2019 to which the Neighbourhood Plan policies relate   |
|-----------------------------|---|---|
| G1                          | Improving access and parking                | No specific policies (but does not contradict the NPPF)   |
| G2                          | Strategic green space                       | 96 access to open space; 170a protecting and enhancing valued landscapes; 185 strategies for conserving and enhancing heritage assets   |
| G3                          | Creating well-designed places               | 124 importance of good design; 125-126 setting clear design expectations using appropriate tools; 127 design expectations; 129 tools and processes to assess design quality   |
| G4                          | Sustainable design                          | 148-150 planning for a low carbon future and mitigating and adapting to climate change  |
| G5                          | Baldock conservation area                   | 184 conserve heritage assets in a manner appropriate to their significance; 185 strategies for conserving and enhancing heritage assets; 200 development affecting Conservation Areas and World Heritage Sites  |
| G6                          | Local heritage assets                       | 184 conserve heritage assets in a manner appropriate to their significance; 189-90 assess the significance of heritage assets affected by development; 197 development affecting non-designated heritage assets   |
| E1                          | Transport and air quality                   | 104d provide for high quality walking and cycling networks; 109 preventing severe impacts on the road network; 110a prioritising pedestrian, cycle and then public transport movements; 110c places that are safe, secure and attractive; 181 compliance with air quality objectives and mitigating impacts   |
| E2                          | Green infrastructure and outdoor recreation | 91c facilities to enable and support healthy lifestyles; 96 access to open space; 98 protect and enhance public rights of way; 127e optimise site potential; 127f safe, inclusive and accessible places which promote health and well-being; 170d minimising impacts on and providing net gains for biodiversity; 171 strategic approach to maintaining and enhancing green infrastructure  |
| E3                          | Managing construction impacts               | 170e preventing unacceptable pollution and improving local environmental conditions; 181 compliance with air quality objectives and mitigating impacts  |
| E4                          | Building strong communities                 | 39-40 pre-application engagement; 91 achieving healthy, inclusive and safe places; 92a plan positively for community facilities; 128 early engagement on design matters   |
| E5                          | Development north of the railway            | 92a plan positively for community facilities; 104d provide for high quality walking and cycling networks; 110c places that are safe, secure and attractive; 127b visual attractiveness (including appropriate and effective landscaping); 127c sympathetic to local character and history (including landscape setting); 141 Green Belt enhancement; 170a protecting and enhancing valued landscapes and sites of biodiversity value; 174a safeguard habitats, including locally-designated sites |

|    |   |   |
|----|---|---|
| E6 | Royston Road                              | 104d provide for high quality walking and cycling networks; 110c places that are safe, secure and attractive; 127b visual attractiveness (including appropriate and effective landscaping); 127c sympathetic to local character and history (including landscape setting); 127d establish or maintain a strong sense of place;  |
| E7 | Cambrai Farm and south of Clothall Common | 92a plan positively for community facilities; 97 safeguarding existing open space; 127b visual attractiveness (including appropriate and effective landscaping); 127c sympathetic to local character and history (including landscape setting); 170e preventing unacceptable pollution and improving local environmental conditions; 178a site suitability (including ground conditions); |
| V1 | Bygrave village                           | 127c sympathetic to local character and history; 127d establish or maintain a strong sense of place; 145-146 development which is not inappropriate in the Green Belt; 180c limit impact of light pollution   |
| V2 | Clothall and Luffenhall                   | 78 location of rural housing; 127c sympathetic to local character and history; 127d establish or maintain a strong sense of place; 145-146 development which is not inappropriate in the Green Belt; 180c limit impact of light pollution   |

### Approach to considering sustainable development

Neighbourhood plans are required to contribute to the achievement of sustainable development. Sustainable development is a broad concept, which at a very high level can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs<sup>5</sup>.

This means that the planning system as a whole should pursue three overarching (and interdependent) objectives:

- an economic objective – to help build a strong, responsive and competitive economy
- a social objective – to support strong, vibrant and healthy communities
- an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment

National policy expects these objectives to be delivered through the preparation and implementation of plans, although there is no requirement for individual neighbourhood plans to address all of them (as the decision about whether to produce a neighbourhood plan, and its scope, is up to the local community).

The Baldock, Bygrave and Clothall Neighbourhood Plan builds on relevant proposals in the new North Hertfordshire Local Plan, which have already been subject to a thorough process of strategic environmental assessment and sustainability appraisal (which are legal or policy requirements for such documents). The additional policies in the Neighbourhood Plan are not considered to have the potential for significant environmental effects in their own right, such as to require a strategic environmental assessment to be carried out<sup>6</sup>.

However, to help demonstrate how the Neighbourhood Plan contributes to the achievement of sustainable development, a sustainability check of its policies has been prepared, and has been taken into account in refining the plan prior to its consultation and submission.

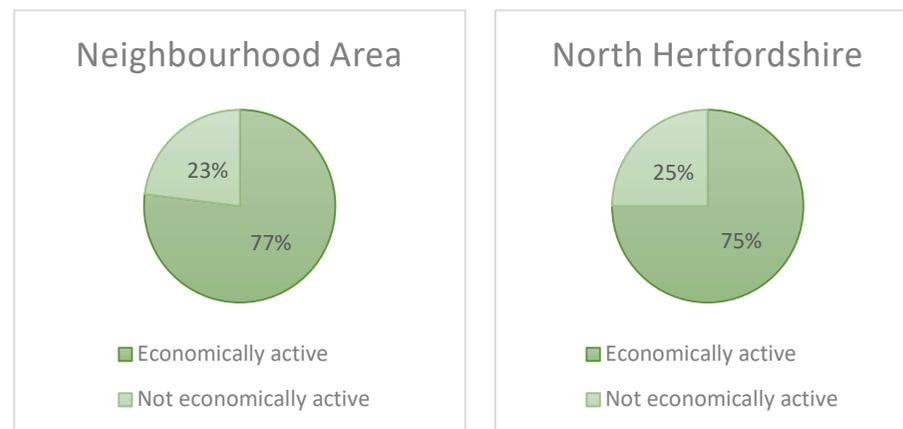
<sup>5</sup> Ministry of Housing, Communities and Local Government (2019) *National Planning Policy Framework*.

<sup>6</sup> See the screening determination prepared by North Hertfordshire District Council, which is available on our web site [www.bbplan.co.uk](http://www.bbplan.co.uk). This was prepared for the consultation draft of

### The sustainability check

To carry out the sustainability check, the policies in the Neighbourhood Plan have been assessed against a number of sustainable development objectives and questions. These are the same as those used to assess the policies in the new North Hertfordshire Local Plan. They cover the three high-level objectives set out in national planning policy (i.e. economic, social and environmental), but in more detail, and in a way which relates to the particular circumstances of North Hertfordshire. This appraisal framework is set out in Table 2.

It was considered appropriate to use this framework as the Neighbourhood Area is broadly similar to the district as a whole, comprising a market town and a rural hinterland containing a number of villages, and bisected by strategic transport routes. In socio-economic terms, the Neighbourhood Area and wider district are also very similar. For example, economic activity rates at the time of the last Census were almost the same:



Source: 2011 Census (usual residents aged 16 to 74)

the plan, but as the submission version has not changed significantly the conclusions of the screening determination are considered to remain valid.

Similarly, the Census showed instances of deprivation across the two areas as being almost identical: 30% of households in the Neighbourhood Area, and 31% in North Hertfordshire as a whole, were recorded as being deprived on one of the nationally-reported dimensions<sup>7</sup>; while 52% of households in the Neighbourhood Area and 51% in North Hertfordshire were not recorded against any of the dimensions.

In addition, none of the evidence reviewed or collected as part of the Neighbourhood Plan's preparation has suggested that any aspect of the appraisal framework used for the emerging North Hertfordshire Local Plan is inappropriate in relation to the Neighbourhood Area, even though the Neighbourhood Plan itself is not seeking to address every aspect of sustainable development.

To carry out the check, each policy in the Neighbourhood Plan has been assessed against the different objectives in the sustainability appraisal framework. A scoring system which is the same as that used for aspects of the new Local Plan's sustainability appraisal was also used, to help ensure a consistent approach:

|   |   |
|---|---|
| Positive compatibility with the sustainability objective      | ✓ |
| Conflict with the sustainability objective                    | × |
| Uncertain impact on the sustainability objective              | ? |
| Neutral (policy not relevant to the sustainability objective) | 0 |

### Results of the sustainability check

The outcome of applying this framework to the policies in the Neighbourhood Plan is shown in Table 3. All of the Neighbourhood Plan's policies provide positive support for one or more of the sustainability objectives, and no conflicts with those objectives have been identified. A minority of the sustainability objectives are not supported by any of the Neighbourhood Plan's policies, but this is unsurprising given

<sup>7</sup> These relate to aspects of employment, education, health and housing.

<sup>8</sup> Markides Associates for NHDC (2018) *North Hertfordshire District Council Parking Strategy Review – Phase 2 Report – Draft*.

that the plan does not attempt to deal comprehensively with all the planning issues facing the area.

Where uncertain impacts on the sustainability objectives have been identified, these relate mainly to whether positive benefits will be realised, as opposed to uncertainty about potential conflicts with those objectives.

There are two exceptions to this. The first is policy G1 (Improving access and parking), due to its uncertain impact on vehicle use and associated pollution. However, the improvements proposed by the policy are very modest, and are unlikely to have a significant impact on trip generation, especially in comparison to the potential movements generated by the allocations proposed in the new North Hertfordshire Local Plan. In addition, it is important that people living in the Neighbourhood Area – and especially outside Baldock itself – are able to make use of the railway station, as the alternative could be longer car-borne trips if they choose to drive for journeys to other centres rather than use the train. Additional measures to address the impact of commuter parking in Baldock and encourage sustainable journeys may be needed during the plan period (e.g. changes to on-street parking arrangements)<sup>8</sup>, but these are beyond the scope of the Neighbourhood Plan itself.

Second, the restriction on new external lighting in association with development in the villages (policies V1 and V2) could in theory have some impact on public health, as it might hinder improvements that would benefit highway safety. However, any impact is unlikely to be significant given the rural nature of the villages and the very limited amount of new development expected in each of them. On balance, it is considered reasonable to restrict new lighting in the villages in view of the wider policy objective of maintaining their rural character.

Overall, therefore, it is concluded that the Neighbourhood Plan will contribute to the achievement of sustainable development in the area.

**Table 2: Sustainability appraisal framework<sup>9</sup>**

| Sustainability objectives  | Will the policy or proposal help to...   |
|--|--|
| <b>ECONOMIC ACTIVITY</b>   |  |
| 1 Achieve sustainable levels of prosperity and economic growth   | <ul style="list-style-type: none"> <li>• maintain a diversified economy, with increased resilience to external shocks?</li> <li>• encourage new business to start-up and thrive in the District?</li> <li>• support and encourage the rural economy and diversification?</li> <li>• support and promote sustainable tourism in towns and rural areas?</li> <li>• improve the quality of local jobs available to people in the District?</li> <li>• increase the skills base?</li> <li>• make the cost of housing more affordable to those employed in the District?</li> </ul> |
| <b>LAND USE AND DEVELOPMENT PATTERNS</b>   |  |
| 2(a) Minimise the development of greenfield land and other land with high environmental and amenity value? | <ul style="list-style-type: none"> <li>• promote the use of brownfield sites and if brownfield sites are not available, land of low environmental and amenity value?</li> <li>• maximise reuse of vacant buildings and derelict land?</li> <li>• minimise the loss of the best and most versatile agricultural land?</li> <li>• reduce quantity of unremediated contaminated land?</li> </ul>  |
| 2(b) Provide access to green spaces  | <ul style="list-style-type: none"> <li>• provide/improve access for all residents of the District to green spaces?</li> <li>• provide opportunities for people to come into contact with and appreciate wildlife and wild places?</li> <li>• maintain/improve the public right of way network?</li> </ul>  |
| 2(c) Deliver more sustainable location patterns and reduce the use of motor vehicles                       | <ul style="list-style-type: none"> <li>• locate development so as to reduce the need to travel?</li> <li>• reduce car reliance, encourage walking, cycle, bus, and train use?</li> <li>• reduce road freight movements?</li> <li>• avoid exacerbating local traffic congestion?</li> <li>• provide affordable, accessible public transport in towns and in rural areas?</li> </ul>   |
| <b>ENVIRONMENTAL PROTECTION</b>  |  |
| 3(a) Protect and enhance biodiversity  | <ul style="list-style-type: none"> <li>• protect habitats and species, especially those designated as being of importance, and provide opportunities for creation of new habitats?</li> <li>• support and maintain extent of wetland habitat and river habitats?</li> </ul>  |
| 3(b) Protect and enhance landscapes  | <ul style="list-style-type: none"> <li>• protect and enhance landscapes, especially those of historic, recreational or amenity value, and within the Chilterns AONB?</li> </ul>  |

<sup>9</sup> CAG Consultants for NHDC (2018) *Sustainability Appraisal of the North Herts Submission Local Plan: Modifications Following Public Examination – SA Report Addendum*

| Sustainability objectives   | Will the policy or proposal help to...   |
|---|--|
| 3(c) Conserve and where appropriate, enhance the historic environment                         | <ul style="list-style-type: none"> <li>• conserve and enhance the historic built character of the District's town's and villages?</li> <li>• protect sites of archaeological and historic importance, whether designated or not?</li> </ul>  |
| 3(d) Reduce pollution from any source   | <ul style="list-style-type: none"> <li>• improve the water quality of rivers and groundwater supplies?</li> <li>• achieve good air quality?</li> <li>• reduce ambient noise, especially from traffic?</li> <li>• reduce light pollution in the District?</li> <li>• protect soil quality?</li> </ul>   |
| <b>CLIMATE CHANGE</b>   |  |
| 4(a) Reduce greenhouse gas emissions  | <ul style="list-style-type: none"> <li>• minimise energy consumption by transport and in buildings?</li> <li>• increase proportion of energy generated by renewable sources?</li> <li>• encourage use of local suppliers and the consumption of local produce?</li> </ul>  |
| 4(b) Improve the District's ability to adapt to climate change                                | <ul style="list-style-type: none"> <li>• reduce vulnerability to climate change, exploit any benefits?</li> <li>• avoid development in areas at risk from flooding?</li> </ul>   |
| <b>A JUST SOCIETY</b>   |  |
| 5(a) Share benefits of prosperity fairly  | <ul style="list-style-type: none"> <li>• reduce disparities in income levels?</li> <li>• contribute to regeneration of deprived areas (estates in Letchworth and Hitchin)?</li> <li>• provide employment and other opportunities for unemployed, especially long term unemployed and the disabled?</li> <li>• encourage entrepreneurial activity in deprived areas?</li> </ul> |
| 5(b) Provide access to services and facilities for all  | <ul style="list-style-type: none"> <li>• provide access to services and facilities without need to use a car?</li> <li>• retain rural services, especially shops, post offices, schools, health centres and bus services?</li> <li>• recognise the needs of specific groups such as minority ethnic groups, the young, the elderly and the disabled?</li> </ul>                |
| 5(c) Promote community cohesion   | <ul style="list-style-type: none"> <li>• support development of voluntary sector?</li> <li>• encourage development of community run business?</li> <li>• encourage people's feelings of belonging, for example by providing community meeting places?</li> <li>• recognise and value cultural and ethnic diversity?</li> </ul>   |
| 5(d) Increase access to decent and affordable housing   | <ul style="list-style-type: none"> <li>• help improve the quality of the housing stock and reduce the number of unfit homes?</li> <li>• increase access to affordable housing, particularly for the young, the disabled and key workers?</li> </ul>  |
| 5(e) Reduce crime rates and fear of crime   | <ul style="list-style-type: none"> <li>• encourage crime reduction, particularly through the appropriate design of new development?</li> <li>• help reduce the fear of crime?</li> </ul>   |
| 5(f) Improve conditions and services that engender good health and reduce health inequalities | <ul style="list-style-type: none"> <li>• help promote healthy lifestyles?</li> <li>• improve access to health services by means other than private cars?</li> <li>• reduce ambient noise near residential and amenity areas?</li> </ul>  |

| Sustainability objectives  | Will the policy or proposal help to...   |
|--|--|
|  | <ul style="list-style-type: none"> <li>• reduce road accidents?</li> <li>• reduce accidents and damage from fires?</li> </ul>  |
| 5(g) Increase participation in education and life-long learning                                  | <ul style="list-style-type: none"> <li>• improve access to skills learning by young people?</li> <li>• improve access to skills learning by adults?</li> </ul>   |
| 5(h) Maintain and improve culture, leisure and recreational activities that are available to all | <ul style="list-style-type: none"> <li>• increase access to culture, leisure and recreational activities?</li> </ul>   |
| <b>RESOURCE USE AND WASTE</b>  |  |
| 6(a) Use natural resources efficiently; reuse, use recycled where possible                       | <ul style="list-style-type: none"> <li>• minimise the demand for raw materials?</li> <li>• encourage sustainable design, use of sustainable building materials and minimise wastage caused by construction methods?</li> <li>• limit water consumption to levels supportable by natural process and storage systems?</li> <li>• protect groundwater resources?</li> <li>• promote sustainable drainage systems?</li> <li>• reduce minerals extracted and imported?</li> </ul>  |
| 6(b) Reduce waste  | <ul style="list-style-type: none"> <li>• reduce, reuse or recycle waste generated?</li> </ul>  |
| <b>TOWN CENTRES</b>  |  |
| 7 Promote sustainable urban living   | <ul style="list-style-type: none"> <li>• encourage wider range of shops and services in town centres?</li> <li>• encourage more people to live in town centres?</li> <li>• encourage mixed use developments in town centres?</li> <li>• improve transport connections in, and to, town centres?</li> <li>• encourage synergy in land uses, which supports the continued and enhanced viability of a wide range of shops and services?</li> <li>• protect or improve the quality of the public realm in towns?</li> </ul> |

**Table 3: Assessment of Neighbourhood Plan policies against sustainability objectives****GENERAL POLICIES**

| Sustainability objectives  | Predicted effect of each policy on the sustainability objectives |                             |                                     |                          |                                 |                             | Comments   |
|--|--|-----------------------------|-------------------------------------|--------------------------|---------------------------------|-----------------------------|--|
|  | G1<br>Improving access and parking                               | G2<br>Strategic green space | G3<br>Creating well-designed places | G4<br>Sustainable design | G5<br>Baldock conservation area | G6<br>Local heritage assets |  |
| <b>ECONOMIC ACTIVITY</b>   |  |                             |                                     |                          |                                 |                             |  |
| 1 Achieve sustainable levels of prosperity and economic growth   | 0  | 0                           | 0                                   | 0                        | 0                               | 0                           | This is not an aspect of sustainable development that the plan seeks to influence.   |
| <b>LAND USE AND DEVELOPMENT PATTERNS</b>   |  |                             |                                     |                          |                                 |                             |  |
| 2(a) Minimise the development of greenfield land and other land with high environmental and amenity value? | 0  | 0                           | 0                                   | 0                        | 0                               | 0                           | This is not an aspect of sustainable development that the plan seeks to influence.   |
| 2(b) Provide access to green spaces  | 0  | ✓                           | 0                                   | 0                        | 0                               | 0                           | Policy G2's proposals for Walls Field create new green space and recreational opportunities.   |
| 2(c) Deliver more sustainable location patterns and reduce the use of motor vehicles                       | ?  | 0                           | 0                                   | 0                        | 0                               | 0                           | The effect of Policy G1 on car travel is uncertain, but any impact is unlikely to be significant.  |
| <b>ENVIRONMENTAL PROTECTION</b>  |  |                             |                                     |                          |                                 |                             |  |
| 3(a) Protect and enhance biodiversity  | 0  | ?                           | 0                                   | 0                        | 0                               | 0                           | Policy G2's proposals for Walls Field could deliver net gains for biodiversity, depending on the uses and habitats provided for.   |
| 3(b) Protect and enhance landscapes  | 0  | ✓                           | 0                                   | 0                        | 0                               | 0                           | Policy G2 seeks to protect and enhance an important landscape feature (the strategic green corridor within and beyond the town).   |
| 3(c) Conserve and where appropriate, enhance the historic environment                                      | 0  | ✓                           | ✓                                   | 0                        | ✓                               | ✓                           | Policies G2, G5 and G6 provide additional policy support for identified heritage assets, while the policy and Design Guidelines associated with Policy G3 also support this objective. |

| Sustainability objectives   | Predicted effect of each policy on the sustainability objectives |                             |                                     |                          |                                 |                             | Comments   |
|---|--|-----------------------------|-------------------------------------|--------------------------|---------------------------------|-----------------------------|--|
|   | G1<br>Improving access and parking                               | G2<br>Strategic green space | G3<br>Creating well-designed places | G4<br>Sustainable design | G5<br>Baldock conservation area | G6<br>Local heritage assets |  |
| 3(d) Reduce pollution from any source   | ?  | 0                           | 0                                   | 0                        | 0                               | 0                           | The effect of Policy G1 on car travel (and associated pollution) is uncertain, but any impact is unlikely to be significant.                                 |
| <b>CLIMATE CHANGE</b>   |  |                             |                                     |                          |                                 |                             |  |
| 4(a) Reduce greenhouse gas emissions  | 0  | 0                           | 0                                   | ✓                        | 0                               | 0                           | This objective is addressed directly by Policy G4.   |
| 4(b) Improve the District’s ability to adapt to climate change                                | 0  | 0                           | ✓                                   | ✓                        | 0                               | 0                           | This objective is addressed directly by Policy G4, while the Design Guidelines linked to Policy G3 illustrate measures that can also support this objective. |
| <b>A JUST SOCIETY</b>   |  |                             |                                     |                          |                                 |                             |  |
| 5(a) Share benefits of prosperity fairly  | 0  | 0                           | 0                                   | 0                        | 0                               | 0                           | This is not an aspect of sustainable development that the plan seeks to influence.   |
| 5(b) Provide access to services and facilities for all  | ✓  | 0                           | 0                                   | 0                        | 0                               | 0                           | Policy G1 seeks to improve access to certain key services.   |
| 5(c) Promote community cohesion   | 0  | 0                           | 0                                   | 0                        | 0                               | 0                           | This is not an aspect of sustainable development that these policies seek to influence.  |
| 5(d) Increase access to decent and affordable housing   | 0  | 0                           | 0                                   | 0                        | 0                               | 0                           | This is not an aspect of sustainable development that these policies seek to influence.  |
| 5(e) Reduce crime rates and fear of crime   | 0  | 0                           | ?                                   | 0                        | 0                               | 0                           | Some of the design principles linked to Policy G3 could help to create environments that deter crime.  |
| 5(f) Improve conditions and services that engender good health and reduce health inequalities | 0  | ?                           | 0                                   | 0                        | 0                               | 0                           | Policy G2 could have an indirect benefit through the provision of improved recreation opportunities.   |
| 5(g) Increase participation in education and life-long learning                               | 0  | 0                           | 0                                   | 0                        | 0                               | 0                           | This is not an aspect of sustainable development that the plan seeks to influence.   |

| Sustainability objectives  | Predicted effect of each policy on the sustainability objectives |                             |                                     |                          |                                 |                             | Comments   |
|--|--|-----------------------------|-------------------------------------|--------------------------|---------------------------------|-----------------------------|--|
|  | G1<br>Improving access and parking                               | G2<br>Strategic green space | G3<br>Creating well-designed places | G4<br>Sustainable design | G5<br>Baldock conservation area | G6<br>Local heritage assets |  |
| 5(h) Maintain and improve culture, leisure and recreational activities that are available to all | 0  | ✓                           | 0                                   | 0                        | 0                               | 0                           | Policy G2 supports the provision of new recreation opportunities.                              |
| <b>RESOURCE USE AND WASTE</b>  |  |                             |                                     |                          |                                 |                             |  |
| 6(a) Use natural resources efficiently; reuse, use recycled where possible                       | 0  | 0                           | 0                                   | ✓                        | 0                               | 0                           | Policy G4 will help to encourage efficient use of natural resources.                           |
| 6(b) Reduce waste  | 0  | 0                           | 0                                   | 0                        | 0                               | 0                           | This is not an aspect of sustainable development that the plan seeks to influence.             |
| <b>TOWN CENTRES</b>  |  |                             |                                     |                          |                                 |                             |  |
| 7 Promote sustainable urban living   | 0  | 0                           | ?                                   | 0                        | 0                               | 0                           | Some of the Design Guidelines linked to Policy G3 provide indirect support for this objective. |

## POLICIES FOR SPECIFIC SITES

| Sustainability objectives  | Predicted effect of each policy on the sustainability objectives |  |   |   |  |                    |  | Comments   |
|--|--|--|---|---|--|--------------------|--|--|
|  | E1<br>Transport and<br>air quality                               | E2<br>Green<br>infrastructure<br>and outdoor<br>recreation | E3<br>Managing<br>construction<br>impacts | E4<br>Building<br>strong<br>communities | E5<br>Development<br>north of the<br>railway | E6<br>Royston Road | E7<br>Cambrai Farm<br>and south of<br>Clothall<br>Common |  |
| <b>ECONOMIC ACTIVITY</b>   |  |  |   |   |  |                    |  |  |
| 1 Achieve sustainable levels of prosperity and economic growth   | 0  | 0  | 0   | 0                                       | 0  | 0                  | 0  | This is not an aspect of sustainable development that the plan seeks to influence.   |
| <b>LAND USE AND DEVELOPMENT PATTERNS</b>   |  |  |   |   |  |                    |  |  |
| 2(a) Minimise the development of greenfield land and other land with high environmental and amenity value? | 0  | 0  | 0   | 0                                       | 0  | 0                  | 0  | This is not an aspect of sustainable development that the plan seeks to influence.   |
| 2(b) Provide access to green spaces  | 0  | ✓  | 0   | 0                                       | 0  | 0                  | ✓  | This is addressed directly by policies E2 and E7 (the latter protecting an important area of existing open space).                             |
| 2(c) Deliver more sustainable location patterns and reduce the use of motor vehicles                       | ✓  | 0  | 0   | ✓                                       | ✓  | ✓                  | 0  | Policies E1, E5 and E6 contain measures to promote walking, cycling and public transport, while E4 encourages the early provision of services. |
| <b>ENVIRONMENTAL PROTECTION</b>  |  |  |   |   |  |                    |  |  |
| 3(a) Protect and enhance biodiversity  | 0  | ✓  | 0   | 0                                       | ✓  | ✓                  | ✓  | Policies E2, E5, E6 and E7 all contain proposals that will help to protect or enhance biodiversity.  |
| 3(b) Protect and enhance landscapes  | 0  | ✓  | 0   | 0                                       | ✓  | ✓                  | ✓  | Policies E2, E5, E6 and E7 all contain proposals that will help to protect or enhance landscapes.  |
| 3(c) Conserve and where appropriate, enhance the historic environment                                      | 0  | 0  | 0   | 0                                       | ✓  | 0                  | 0  | The safeguards in Policy E5 help to support this objective.  |

| Sustainability objectives   | Predicted effect of each policy on the sustainability objectives |   |                                     |                                   |  |                    |   | Comments   |
|---|--|---|-------------------------------------|-----------------------------------|--|--------------------|---|--|
|   | E1<br>Transport and air quality                                  | E2<br>Green infrastructure and outdoor recreation | E3<br>Managing construction impacts | E4<br>Building strong communities | E5<br>Development north of the railway | E6<br>Royston Road | E7<br>Cambrai Farm and south of Clothall Common |  |
| 3(d) Reduce pollution from any source   | ✓  | 0   | ✓                                   | 0                                 | 0                                      | 0                  | ✓   | Policies E1, E3 and E7 all contain measures to help reduce certain types of pollution.   |
| <b>CLIMATE CHANGE</b>   |  |   |                                     |                                   |  |                    |   |  |
| 4(a) Reduce greenhouse gas emissions  | 0  | 0   | 0                                   | 0                                 | 0                                      | 0                  | 0   | This is not an aspect of sustainable development that these policies seek to influence.  |
| 4(b) Improve the District's ability to adapt to climate change                                | 0  | ✓   | 0                                   | 0                                 | 0                                      | 0                  | 0   | Policy E2 contains measures that support this objective.   |
| <b>A JUST SOCIETY</b>   |  |   |                                     |                                   |  |                    |   |  |
| 5(a) Share benefits of prosperity fairly  | 0  | 0   | 0                                   | 0                                 | 0                                      | 0                  | 0   | This is not an aspect of sustainable development that the plan seeks to influence.   |
| 5(b) Provide access to services and facilities for all  | ✓  | 0   | 0                                   | ✓                                 | ✓                                      | 0                  | 0   | Policies E1, E4 and E5 should improve access to services, either through their early provision or by supporting new walking, cycling or public transport routes. |
| 5(c) Promote community cohesion   | 0  | 0   | 0                                   | ✓                                 | 0                                      | 0                  | 0   | Policy E4 contains specific requirements to help build strong communities.   |
| 5(d) Increase access to decent and affordable housing   | 0  | 0   | 0                                   | 0                                 | 0                                      | 0                  | 0   | This is not an aspect of sustainable development that these policies seek to influence.  |
| 5(e) Reduce crime rates and fear of crime   | 0  | 0   | 0                                   | 0                                 | 0                                      | 0                  | 0   | This is not an aspect of sustainable development that these policies seek to influence.  |
| 5(f) Improve conditions and services that engender good health and reduce health inequalities | 0  | ✓   | 0                                   | ✓                                 | 0                                      | 0                  | 0   | The support for recreational opportunities in policy E2, and for the early provision of community facilities in policy E4, both support this objective.          |

| Sustainability objectives  | Predicted effect of each policy on the sustainability objectives |   |                                     |                                   |  |                    |   | Comments  |
|--|--|---|-------------------------------------|-----------------------------------|--|--------------------|---|---|
|  | E1<br>Transport and air quality                                  | E2<br>Green infrastructure and outdoor recreation | E3<br>Managing construction impacts | E4<br>Building strong communities | E5<br>Development north of the railway | E6<br>Royston Road | E7<br>Cambrai Farm and south of Clothall Common |   |
| 5(g) Increase participation in education and life-long learning                                  | 0  | 0   | 0                                   | 0                                 | 0                                      | 0                  | 0   | This is not an aspect of sustainable development that the plan seeks to influence.      |
| 5(h) Maintain and improve culture, leisure and recreational activities that are available to all | 0  | ✓   | 0                                   | ✓                                 | ✓                                      | 0                  | ✓   | Aspects of policies E2, E4, E5 and E7 provide support for this objective.               |
| <b>RESOURCE USE AND WASTE</b>  |  |   |                                     |                                   |  |                    |   |   |
| 6(a) Use natural resources efficiently; reuse, use recycled where possible                       | 0  | 0   | 0                                   | 0                                 | 0                                      | 0                  | 0   | This is not an aspect of sustainable development that these policies seek to influence. |
| 6(b) Reduce waste  | 0  | 0   | 0                                   | 0                                 | 0                                      | 0                  | 0   | This is not an aspect of sustainable development that the plan seeks to influence.      |
| <b>TOWN CENTRES</b>  |  |   |                                     |                                   |  |                    |   |   |
| 7 Promote sustainable urban living   | 0  | 0   | 0                                   | 0                                 | 0                                      | 0                  | 0   | This is not an aspect of sustainable development that these policies seek to influence. |

## POLICIES FOR THE VILLAGES

| Sustainability objectives  | Predicted effect of each policy on the sustainability objectives |                                  | Comments  |
|--|--|----------------------------------|---|
|  | V1<br>Bygrave<br>village   | V2<br>Clothall and<br>Luffenhall |   |
| <b>ECONOMIC ACTIVITY</b>   |  |                                  |   |
| 1 Achieve sustainable levels of prosperity and economic growth   | 0  | 0                                | This is not an aspect of sustainable development that the plan seeks to influence.  |
| <b>LAND USE AND DEVELOPMENT PATTERNS</b>   |  |                                  |   |
| 2(a) Minimise the development of greenfield land and other land with high environmental and amenity value? | 0  | 0                                | This is not an aspect of sustainable development that the plan seeks to influence.  |
| 2(b) Provide access to green spaces  | 0  | 0                                | This is not an aspect of sustainable development that these policies seek to influence.   |
| 2(c) Deliver more sustainable location patterns and reduce the use of motor vehicles                       | ✓  | ✓                                | These policies limit development in places where growth would be likely to encourage increased car travel.  |
| <b>ENVIRONMENTAL PROTECTION</b>  |  |                                  |   |
| 3(a) Protect and enhance biodiversity  | 0  | 0                                | This is not an aspect of sustainable development that these policies seek to influence.   |
| 3(b) Protect and enhance landscapes  | ✓  | 0                                | Policy V1 preserves the gap between Upper and Lower Bygrave, which is an important aspect of their landscape setting.   |
| 3(c) Conserve and where appropriate, enhance the historic environment                                      | ✓  | ✓                                | Both policies seek to maintain the distinctive characters of the villages, much of which derives from their historic development pattern and heritage assets.         |
| 3(d) Reduce pollution from any source  | 0  | 0                                | This is not an aspect of sustainable development that these policies seek to influence.   |
| <b>CLIMATE CHANGE</b>  |  |                                  |   |
| 4(a) Reduce greenhouse gas emissions   | 0  | 0                                | This is not an aspect of sustainable development that these policies seek to influence.   |
| 4(b) Improve the District's ability to adapt to climate change   | 0  | 0                                | This is not an aspect of sustainable development that these policies seek to influence.   |
| <b>A JUST SOCIETY</b>  |  |                                  |   |
| 5(a) Share benefits of prosperity fairly   | 0  | 0                                | This is not an aspect of sustainable development that the plan seeks to influence.  |
| 5(b) Provide access to services and facilities for all   | 0  | 0                                | This is not an aspect of sustainable development that these policies seek to influence.   |
| 5(c) Promote community cohesion  | 0  | 0                                | This is not an aspect of sustainable development that these policies seek to influence.   |
| 5(d) Increase access to decent and affordable housing  | ?  | ?                                | Both policies make clear that limited affordable housing on exception sites may be appropriate, but this will depend on local needs and whether suitable sites exist. |
| 5(e) Reduce crime rates and fear of crime  | 0  | 0                                | This is not an aspect of sustainable development that these policies seek to influence.   |

|  |   |   |  |
|--|---|---|--|
| 5(f) Improve conditions and services that engender good health and reduce health inequalities    | ? | ? | Restricting new outdoor lighting could potentially hinder highway safety after dark, but any impact is unlikely to be significant given the rural nature of the villages and limited amount of development expected in them. |
| 5(g) Increase participation in education and life-long learning                                  | 0 | 0 | This is not an aspect of sustainable development that the plan seeks to influence.   |
| 5(h) Maintain and improve culture, leisure and recreational activities that are available to all | 0 | 0 | This is not an aspect of sustainable development that these policies seek to influence.  |
| RESOURCE USE AND WASTE   |   |   |  |
| 6(a) Use natural resources efficiently; reuse, use recycled where possible                       | 0 | 0 | This is not an aspect of sustainable development that these policies seek to influence.  |
| 6(b) Reduce waste  | 0 | 0 | This is not an aspect of sustainable development that the plan seeks to influence.   |
| TOWN CENTRES   |   |   |  |
| 7 Promote sustainable urban living   | 0 | 0 | This is not an aspect of sustainable development that these policies seek to influence.  |

### Approach to considering conformity with the development plan

Neighbourhood plans must be in ‘general conformity’ with any strategic policies that already form part of the development plan for the area, at the time the neighbourhood plan is examined. General conformity is a broad test: it does not mean, or require, that neighbourhood plan policies replicate those strategic policies. It is more a question of the extent to which a neighbourhood plan upholds the general principles in the strategic policies (and can justify any departure from them).

When the Baldock, Bygrave and Clothall Neighbourhood Plan was being prepared, it was expected that the new North Hertfordshire Local Plan would be adopted ahead of the Neighbourhood Plan, and so would be the basis for considering general conformity. Delays to the Local Plan’s examination mean that is now unlikely to be the case, and so the legal requirements relating to general conformity need to be considered against the existing policies that form the statutory development plan.

These existing policies are, in general, confined to a limited set of ‘saved’ policies from the District Local Plan No.2 With Alterations, dating from 1996 (relevant policies from which are listed in Annex B of the Neighbourhood Plan)<sup>10</sup>. None of these are expressly identified as being ‘strategic’, and not all of them are up to date<sup>11</sup>. Nevertheless, no significant conflicts have been identified between these saved policies and those in the Neighbourhood Plan, such as to trigger any general conformity issues.

While it is not the formal basis for considering general conformity, it is also important to consider the consistency between the proposals in the Neighbourhood Plan and those in the new North Hertfordshire Local Plan, as the latter has reached an advanced stage<sup>12</sup> and the two documents will need to work together once both are in force.

The Baldock, Bygrave and Clothall Neighbourhood Plan has been prepared in parallel with the new North Hertfordshire Local Plan, and the aim from the outset has been

<sup>10</sup> In addition to these saved Local Plan policies, dedicated policies for minerals and waste also form part of the existing development plan, but are not considered to pose any general conformity issues. These policies are contained in Hertfordshire County Council’s Minerals Local Plan Review (2007), Waste Core Strategy and Development Management Policies (2012) and Waste Site Allocations Document (2014).

<sup>11</sup> North Hertfordshire District Council’s web site notes that saved policies 6 (development in rural areas beyond the green belt), 25 (re-use of rural buildings), 26 (housing provision) and 36

to add additional safeguards to those in the new Local Plan, rather than provide an alternative strategy. It is designed to be consistent with both the strategic policies and the other policies in the new Local Plan, but in a way that provides additional detail to help maintain the character of the Neighbourhood Area and ensure that new development is as sustainable as possible.

The basis for each policy in the Neighbourhood Plan, including its relationship with relevant policies in the new North Hertfordshire Local Plan, is explained in the supporting text in the Neighbourhood Plan itself. Discussions with officers at North Hertfordshire District Council took place at regular intervals during the preparation of the Neighbourhood Plan to help ensure that the policies are aligned.

Once the new North Hertfordshire Local Plan is adopted, there may be a need for consequential adjustments to the Neighbourhood Plan. If these are very minor, such as updating references to Local Plan policy numbers, then the adjustments can be made through a minor (non-material) modification procedure. If, however, there are more significant and unexpected changes to the Local Plan, it may be necessary to amend aspects of the Neighbourhood Plan to reflect those revised policies. If that is the case then a fuller process of consultation and re-examination is likely to be needed.

### The Local Plan gap analysis

A key consideration in preparing the Neighbourhood Plan was the extent to which it could usefully add to the policies in the new North Hertfordshire Local Plan, and in doing so help to address issues that were of concern to the local community.

To assess this in a structured way, a ‘gap analysis’ of the policies in the emerging Local Plan was carried out, and forms part of the evidence that supports the Neighbourhood Plan. The results of this analysis are summarised in Table 4 overleaf.

(employment provision) are inconsistent with the 2012 National Planning Policy Framework. No assessment appears to have been made against the more recent NPPF (2019).

<sup>12</sup> The main hearing sessions have been held, and draft Main Modifications consulted on. The Inspector has asked for some further hearing sessions to be held, but these do not directly concern the proposals for Baldock.

**Table 4: Gap analysis of the new North Hertfordshire Local Plan**

| Issues   | Opportunities   |
|--|---|
| <p><b>Vision and objectives:</b> The new Local Plan contains a broad vision and objectives for North Hertfordshire, but does not provide a distinctive vision for Baldock, despite the scale of change proposed. Similarly, it provides only very brief factual descriptions of Bygrave and Clothall villages (and nothing on Luffenhall).</p>   | <ul style="list-style-type: none"> <li>a) To provide a vision for Baldock’s future, and associated principles for new development (e.g. measures to help keep Baldock ‘one town’ rather than two communities north/south of the railway).</li> <li>b) To provide a more detailed policy framework for the villages within the neighbourhood area, which recognises their distinctive characters.</li> </ul> |
| <p><b>Major developments:</b> The new Local Plan sets out various requirements that site BA1 (North of Baldock) should meet, including infrastructure. It also sets out some policies for the other major proposals at Baldock but does not consider how they will work together.</p>  | <p>To provide a more cohesive framework for the other development sites which addresses their cumulative impacts and opportunities (such as improved gateways and corridors into the town, and links between the sites and neighbouring areas of development).</p>  |
| <p><b>Design:</b> The new Local Plan policies are very broad, rather than setting out specific principles to guide the form of development in a way that reflects the character of each place. The supporting Supplementary Planning Document on design is out of date and does not provide visual or place-specific guidance.</p>   | <p>To set out key design principles for the major developments proposed in the new Local Plan (e.g. street types, building heights, materials), and for the Neighbourhood Area more generally.</p>  |
| <p><b>Heritage:</b> The new Local Plan contains general policies to safeguard listed buildings and conservation areas, buildings of local interest and archaeological sites; but these assets are not shown on the proposals map, and the policies on conservation areas and buildings of local interest could be more comprehensive.</p>  | <ul style="list-style-type: none"> <li>a) To illustrate the location of nationally and locally designated heritage assets.</li> <li>b) To set out additional principles for safeguarding buildings of local interest.</li> </ul>  |
| <p><b>Green space:</b> The new Local Plan deals inconsistently with areas of green space within Baldock, with one area (opposite Tapps) designated as ‘urban open land’ and others incorporated within development allocations or left as ‘white land’, albeit subject to a general policy of protection. Specific areas of new green space – for sport, informal recreation or allotments – are not proposed as part of the site allocations (and no provision is made for indoor sport).</p> | <ul style="list-style-type: none"> <li>a) To provide clearer, more specific, protection for important areas of green space.</li> <li>b) To set out requirements for new green space and recreational facilities in association with the major development proposed in the new Local Plan.</li> </ul>  |
| <p><b>Environmental impacts:</b> The new Local Plan contains general policies designed to avoid or mitigate the impact that new development could have on air quality, flood risk, water courses and protected species; but does not deal in specific terms with all the potential issues that are particular to the Neighbourhood Area and the sites proposed for development.</p>  | <p>To set out more specific safeguards that new development should comply with.</p>   |

| Issues   | Opportunities  |
|--|--|
| <p><b>Community impacts:</b> The new Local Plan contains proposals to secure improved community facilities in association with new development, but does not address some of the wider issues such as engaging the community in the growth of the town, and mitigating adverse impacts while construction takes place.</p>   | <p>To set out policies that address the potential wider impacts of major development on the local community.</p>   |
| <p><b>Village and rural development:</b> Upper and Lower Bygrave and Clothall villages are 'washed over' by the Green Belt, while Luffenhall does not form part of the settlement hierarchy and lies in the rural area beyond the Green Belt. The new Local Plan does not provide a particularly clear framework for the future of these places, and nor does it contain policies that deal directly with the potential impact of site BA1 on Upper and Lower Bygrave.</p> | <ul style="list-style-type: none"> <li>a) To clarify and provide more specific policies on development in the villages.</li> <li>b) To address the impacts that development north of Baldock could have on Upper and Lower Bygrave.</li> </ul> |

**Approach to considering conformity with EU obligations**

There are three EU Directives that are most relevant in considering the Neighbourhood Plan’s compliance, which are summarised in Table 5. As the final column of the table demonstrates, the plan does not pose any issues of non-conformity with these obligations. No other EU Directives that could pose conformity issues have been identified, taking into consideration the proposals in the plan.

**Table 5: Conformity with relevant EU Directives**

| Directives   | Purpose   | Implications for the Neighbourhood Plan  |
|--|---|--|
| <p><b>Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</b> (often referred to as the Strategic Environmental Assessment (SEA) Directive)</p>   | <p>Seeks to provide a high level of protection of the environment, by integrating environmental considerations into the process of preparing certain plans or programmes that could have significant environmental effects.</p> | <p>The Neighbourhood Plan builds on the proposals in the new North Hertfordshire Local Plan, which has already been subject to strategic environmental assessment. The additional policies in the Neighbourhood Plan are not considered to have the potential for significant environmental effects in their own right, such as to require a strategic environmental assessment to be carried out. A screening determination has been provided by North Hertfordshire District Council to this effect, a copy of which is submitted alongside this basic conditions statement. The screening determination was prepared for the consultation draft of the Neighbourhood Plan, but as the submission version has not changed significantly the conclusions of the screening determination are considered to remain valid.</p> |
| <p><b>Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora and Directive 2009/147/EC on the conservation of wild birds</b> (often referred to as the Habitats and Wild Birds Directives respectively)</p> | <p>These aim to protect and improve Europe’s most important habitats and species. Their requirements (and subsequent amendments) are reflected in the Conservation of Habitats and Species Regulations 2017.</p>                | <p>There are no sites within the Neighbourhood Area which are of international importance for habitats or species (or outside the area which are likely to be affected by the proposals in the plan), which is demonstrated by the screening assessment of the new North Hertfordshire Local Plan<sup>13</sup>.</p>  |

<sup>13</sup> See NHDC (2018) *North Hertfordshire Local Plan 2011-2031 Habitats Regulation Assessment: Screening Report and Appropriate Assessment*.

## Introduction

Under the Equality Act 2010 public authorities are subject to a public sector equality duty, as are other bodies where they are exercising ‘public functions’. The duty is designed to ensure that equality is taken into account in shaping policies and delivering public services. In summary, where the duty applies, those subject to it must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

The duty covers several ‘protected characteristics’: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. There is also a need to have due regard to eliminating unlawful discrimination on the basis of marriage or civil partnership status.

The duty applies specifically to Bygrave Parish Council and Clothall with Luffenhall Parish Meeting. However, as the wider Baldock, Bygrave and Clothall Planning Group can be argued to have been undertaking a ‘public function’ in preparing the Neighbourhood Plan, the duty has been interpreted as applying to the Group as a whole in carrying out this work.

## Applying the duty to the Neighbourhood Plan

Potential equalities impacts have been considered during the preparation of the draft Neighbourhood Plan. The early decision to limit the plan’s scope to five broad areas (community facilities, transport, the environment, open space/recreation and design/heritage) reduced the range of equalities issues that might arise, although these areas nonetheless have the potential for equalities implications.

A proportionate approach has been taken to considering these: our initial assessment was that most of the draft policies would have either a neutral or a positive impact on protected characteristics. For example, those relating to conservation, landscaping and design would be unlikely to have a differential impact on those groups with protected characteristics. Policies to improve access arrangements for pedestrians and cyclists, secure a range of suitable recreation

opportunities, limit adverse impacts relating to traffic and air quality and manage construction impacts could have positive benefits, especially for older people. And Policy E4 (building strong communities) could have benefits across a range of the protected characteristics.

In view of this it was not considered necessary to collect detailed information to assess whether the draft policies would meet the requirements of the Equality Act, or undertake an equalities impact assessment. However, further consideration has been given to three issues raised during the consultation on the draft policies, which could have implications for equality of opportunity or removing/minimising disadvantage:

- One response to Policy G2 (strategic green space) was concerned that using land for sports pitches could create unequal opportunities for access to recreation. However the draft policy did not propose that this land be used solely for pitches, and the submission draft has been amended to make clear that a range of uses is possible and should be informed by community engagement. This will allow a full range of needs and views to be considered.
- Two responses to Policy E4 (building strong communities) argued that securing a community hall big enough to serve larger groups in the town, such as Christchurch, is important. While due regard has been given to this, the availability of suitable community spaces is something that affects all groups, and the Consultation Statement set out earlier in this document explains the limits to what the Neighbourhood Plan can reasonably seek.
- One response to Policy V1 (Bygrave village) noted that street lighting would be beneficial to them as a senior citizen. The policy seeks to prevent development giving rise to additional lighting that would harm Bygrave’s rural character; with Policy V2 applying a similar principle to Clothall and Luffenhall. Due regard has been given to the potential impact of these policies against the requirements of the Act. While a lack of street lighting affects all people, it could be more challenging for some older people, who make up a significant minority of the local population: at the last census 24% of residents in Bygrave parish were aged 60 or above (74 people in total), and 29% in Clothall parish (43 people). Nevertheless, as the same respondent noted, this needs to be balanced against local wishes to maintain the rural character of these villages, which relies in part on a relative absence of external lighting. It is also relevant to note that the draft Neighbourhood Plan does not propose to alter the existing lighting

environment; it merely seeks to restrict new external lighting that could harm this character. On balance, therefore, it is considered that the potential impact of the policy in relation to the Act's objectives is limited, and that it is reasonable to restrict new lighting in the villages in view of wider policy considerations relating to their rural character.

Beyond these specific issues, and taking into account the evidence reviewed and points raised during the preparation of the Neighbourhood Plan, it is not considered that the plan will have any adverse effects in relation to the requirements of the Equality Act.

