



## Representations for St Ippolyts Neighbourhood Plan

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such we are very keen to see these plans progress. We would like to take this opportunity to draw your attention to the Woodland Trust's neighbourhood planning microsite:  
<https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/> This site sets out how woods and trees can help communities meet the aims of their plans.

Please do not hesitate to pass on my details to the St Ippolyts Parish Council and or get in touch if I can be of any assistance as the plan progresses.

**LDF/10635**                      **1**                      **Danbury**  
**Document Section:**                      St Ippolyts Neighbourhood Plan  
Representation:                      *Support*

I would like to offer my support for the parish council application for a St Ippolyts Neighbourhood plan

**LDF/10750**                      **1**                      **Hext**  
**Document Section:**                      St Ippolyts Neighbourhood Plan  
Representation:                      *Object*

The planning area includes Greenbelt and should not under any circumstances be included in any neighbourhood planning area for St Ippolyts.

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excluded from any future Neighbourhood Plan proposals.

Agent

Granted, establishing a boundary would be a first small welcome step; however, on reflection, it would be much sensible to support a more limited Neighbourhood Plan area; one which would just concentrate on informing & supporting future growth and any development in just the two principal villages of Gosmore and St Ippolyts, with possible consideration to include the Hamlets at St Ibbs and Little Almshoe. As there'll be no development or any growth in any of the rural/countryside area of the Parish, it would be completely unnecessary to include it within a new neighbourhood plan area.

Overall, I suspect, rather than promoting any ideas or vision, this is just the latest attempt by the Parish Council to suppress or to slow-down any new development. It is actually rather disingenuous, because the majority of the current crop of Parish Councillors are NIMPs, (Not In My Parish!), and there is no apparent reason to suppose the Parish Council will suddenly start to support any new growth or development. Of course, that unhelpful attitude is contrary to the aims & purposes of establishing a new Neighbourhood Plan. At the moment, I fear the opposite is more likely, whereby any Neighbourhood Plan process could end up becoming open to abuse, with efforts directed towards frustrating new growth or opportunities, or worse even openly opposing new development proposals.

**LDF/08600**                      **10**                      **Moore**

**Document Section:**                      St Ippolyts Neighbourhood Plan  
*Object*

Representation:

In response to your leaflet proposing St Ippolyts Neighbourhood Plan, having considered the matter carefully, on balance, I cannot support the entire Rural Parish Area to be designated a new Neighbourhood Plan Area.

There are two simple and distinct reasons for this. Firstly, if such a proposal is to achieve any meaningful successes, any new Neighbourhood Plan Area needs to be much smaller; for instance, I believe it should start by simply concentrating on future growth within the four existing settlements of Gosmore, St Ippolyts, Little Almshoe & St Ibbs.

Secondly, I am enclosing a leaflet which was hand-delivered to all the households around St Ippolyts only this week. This has reinforced my suspicions; because rather than seek support and fresh ideas in order to further a vision of growth and future development within the Parish, the Parish Council have missed an ideal opportunity to seek the views of the wider community. Instead, I suspect the meeting on Wednesday 14th January will merely provide a platform for those wishing to voice their objections to the Preferred Options of North Hertfordshire District Council.

In addition, even though the closure date for responses to the new Neighbourhood Plan proposal is 13th January, I will write to you again with an `update` following the outcome of this (yet to be convened) public meeting.

P.s: Even the pictures at the bottom of the enclosed leaflet rather clumsily appear to me disingenuous; the crude implication is open sunny countryside on one side but with the implied outcome of new buildings if the Preferred Options of NHDC are built, on the opposite side.

**LDF/09321**                      **1**                      **The Woodland Trust**

**Document Section:**                      St Ippolyts Neighbourhood Plan  
*Support*

Representation:

Many thanks for consulting the Woodland Trust on the designation of the St Ippolyts neighbourhood plan area.

The Woodland Trust are very supportive of the concept of neighbourhood planning as an important mechanism for embedding woods and trees into local communities, as

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parishes both within the District and beyond". For St Ippolyts, with no recent new housing provision, the fall in younger residents has been notable. However for the three arguably most successful villages in North Hertfordshire, namely Ashwell, Offley and Pirton, there the District and Parish Councils have successfully supported new small-scale development over the past decade to enable some younger residents to be able stay in their home village. In comparison, I feel some of the St Ippolyts Parish Councillors appear far too complacent.

3. "I am unaware of any recent proposals for small residential developments within the Parish which are both appropriate to the Parish and acceptable to the District Council". I believe this speaks volumes about the true intentions for the current Parish Council. Sadly, here is a prime example of a Parish with simply far too much Green Belt, the result of which has been to stifle almost every opportunity to date. So far, the Parish Council appear to have revelled in the fact that everything is 'Green Belt', and hence they've objected to pretty much all new housing development.

4. If, as admitted on September 22nd 2014, "The Parish Council has not yet defined a policy or direction..." it seems to me most unlikely that this Parish Council will have suddenly come up with any new vision necessary in order to support any future growth or development.

I genuinely fear the recent St Ippolyts Parish Council Neighbourhood Plan will just result in further wasted expense to rate payers, and may simply end up becoming a brake against the much needed future growth/opportunities for our communities.

A far cheaper and simpler option would be for planning applications to continue to be considered as at present. NHDC will continue to consult St Ippolyts Parish Council as a Statutory Consultee on every single planning application. In turn, the Parish Council's response will be considered by the Case Officer, and subsequently a decision issued.

Instead of being dependant upon the planning expertise of future Parish Councillors, with the whole Neighbourhood Plan exercise possible merely complicating or delaying the determination of fresh applications. Frankly, the opportunity for Neighbourhood Plans to be introduced under the Localism Act was supposedly in order to improve democracy and local accountability. But unless this Parish Council have got a clear vision for future development and growth, (within existing settlements only), I really can't see the point of having any new Neighbourhood Plan.

What would be much more useful would be for the District Council to consult on and then include specific new policies for individual Parishes within the new Local Plan from April 2017 onwards. In the event NHDC are forced to consider a Neighbourhood Plan, then we believe it should only cover the settlement area within St Ippolyts Parish.

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**LDF/08600**      **9**      **Moore**  
**Document Section:**      St Ippolyts Neighbourhood Plan  
*Comment*

Representation:  
As pointed out in the NHDC leaflet requesting a response by 13th January 2015, the primary purpose of introducing any new Neighbourhood Plan under the Localism Act 2011 was supposedly in order to give local communities more power and to help them to develop a vision for their neighbourhood and to shape development and growth within the existing settlements. But thus far, the Parish Council have failed to promote a single idea in this direction. Worse, having previously conducted a Housing Need Survey for St Ippolyts in 2011, to date they then completely failed to act on any of its findings. This, despite all the cost to rate-payers, whose money in this regard has again been wasted.

On balance, it would be a mistake if the whole Parish Area were to be considered for a new Neighbourhood Plan. Specifically, neither the small part of the Parish within the Hitchin settlement area, nor the new proposed site north of Pound Farm are necessary to be included in any future St Ippolyts Neighbourhood Plan; to start with at least, it should only focus much more on local settlements where there is likely to be future growth.

In addition, the area the District Council have recently identified to meet possible future un-met needs for the Borough of Stevenage, (West of Stevenage); this should also be

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Support

Representation:

We wish to state that we agree with the proposal.

**LDf/07667**      **4**      **Anglian Water Asset Management**

**Document Section:**      St Ippolyts Neighbourhood Plan  
*Comment*

Representation:

Thank you for the opportunity to comment on this application.

However, we have no comment to make.

**LDf/08551**      **8**      **Garrod**

**Document Section:**      St Ippolyts Neighbourhood Plan  
*Object*

**ADOC**      **Additional document attached**

Representation:

We disagree with the proposed Neighbourhood Area for St Ippolyts. We have highlighted the four settlements which currently lie within the Parish area, being the villages of Gosmore and St Ippolyts and the hamlets of St Ibbs and Little Almshoe.

We are not even sure it's a good idea for St Ippolyts Parish Council to be in charge of a proposed Neighbourhood Plan. Because, in contrast with Ashwell Parish Council; their Councillors work closely with the former Director of Planning Policy, in order to promote a development vision for their village. Consequently, Councillors continue to work closely with NHDC staff in order to secure some appropriate new development, small scale opportunities, with a specific objective of increasing Ashwell's population in order to preserve existing such as the post office, the school and the doctor's surgery, etc.

Whereas for years St Ippolyts Parish Council have done exactly the opposite; nothing!. Even with the proof published by the Community Development Agency for Hertfordshire 2012, which evidence-based survey supported the need for more housing, to date, in spite of the cost to rate payers, these findings have so far been completely ignored. St Ippolyts Parish Council have failed to act to support the needs of constituents/respondents.

Further, NHDC's own Annual Monitoring Report clearly shows that with the exception of two new houses built within the Hiltchin Settlement area, there has been no new housing achieved anywhere within the Parish for many years. The consequence of which, as has been recorded on the 2011 census; compared to the 2001 census, 245 residents (mainly 18-30 year olds) have been forced to move away from St Ippolyts, because there has been no new housing provision to enable them to stay.

It is of course possible that a new Neighbourhood Plan, if meaningfully drafted could encourage and give rise to future opportunities to enable some to return. But I fear the damage may have already been done.

I am enclosing an original letter recently sent to my neighbour from St Ippolyts Parish Councilor, dated September 22nd 2014. This letter gives a much more truthful/accurate picture of the current thinking of some on the Parish Council. Please note, and I quote:-

1. In spite of there being a current housing shortage/affordability crisis, the reference to "the 'perceived' needs regarding additional dwellings..." is, I feel, extremely telling.
2. The letter inaccurately talks about "...changes in demographic within the Parish over the past decade or so. Research shows a similar picture across many comparative

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Recently in the Preferred Options, NHDC have published a settlement boundary for the two principal villages within St Ippolyts Civil Parish. The public are to be asked to consult on the District Council's Preferred Options by the deadline:- 6th February 2015. In order that the District Council and the Parish Council can work better together, I would suggest any discussions on the future extent of the proposed Neighbourhood Plan Area be postponed. Then, once the District Council have finalised the extent of the settlement boundaries for both Gosmore and St Ippolyts, subsequently it would make good sense for the same boundary to be used for the new Neighbourhood Plan Area.

Specifically, because any Neighbourhood Planning Area is primarily to encourage our local communities to help towards shaping development and growth within that neighbourhood logically, it is only ever going to be within this boundary, once adopted, that any future growth or development will take place. Surely that's where the Parish Council need to concentrate their vision, not on the entire Civil Parish Area.

As 'Parish' & '@Neighbourhood' are certainly not one-and-the-same, not only is it highly unlikely there will be much other development or growth anywhere else in the rest of the Green Belt, it would also be highly misleading, and in my view, wholly inappropriate to ever consider the entire Civil Parish area as just one single Neighbourhood Area. I also fear it may yet prove to be counterproductive.

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**LDF/07307**                      **9**                      **Moore**  
**Document Section:**                      St Ippolyts Neighbourhood Plan  
**Representation:**                      *Object*

Any new neighbourhood plan area should be limited to existing settlements where growth and any developments are likely to occur. I don't think it should include any of Hitchin, or most of the countryside in the south of the parish either. Any future plan area, if approved should be much more localised, i.e. a "Neighbourhood", only the settlements. Not the whole of the civil parish of St Ippolyts.

As pointed out in the NHDC leaflet requesting a response by 13th January 2015, the primary purpose of introducing any new Neighbourhood Plan under the Localism Act 2011 was supposedly in order to give local communities more power and to help them to develop a vision for their neighbourhood and to shape development and growth within the existing settlements. But thus far, the Parish Council have failed to promote a single idea in this direction. Worse, having previously conducted a Housing Need Survey for St Ippolyts in 2011, to date they then completely failed to act on any of its findings. This, despite all the cost to rate-payers, whose money in this regard has again been wasted.

On balance, it would be a mistake if the whole Parish Area were to be considered for a new Neighbourhood Plan. Specifically, neither the small part of the Parish within the Hitchin settlement area, nor the new proposed site north of Pound Farm are necessary to be included in any future St Ippolyts Neighbourhood Plan; to start with at least, it should only focus much more on local settlements where there is likely to be future growth.

In addition, the area the District Council have recently identified to meet possible future un-met needs for the Borough of Stevenage, (West of Stevenage); this should also be excluded from any future Neighbourhood Plan proposals.

Granted, establishing a boundary would be a first small welcome step; however, on reflection, it would be much sensible to support a more limited Neighbourhood Plan area; one which would just concentrate on informing & supporting future growth and any development in just the two principal villages of Gosmore and St Ippolyts, with possible consideration to include the Hamlets at St Ibbs and Little Almshoe. As there'll be no development or any growth in any of the rural/countryside area of the Parish, it would be completely unnecessary to include it within a new neighbourhood plan area.

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**LDF/07635**                      **3**                      **Dawson**  
**Document Section:**                      St Ippolyts Neighbourhood Plan





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Motors is located 142m south west of the bottom corner of the proposed Plan Area. This site is safeguarded as a waste facility under policy 5: safeguarding of sites of the Waste Core Strategy and Development Management Policies document.

In terms of minerals matters, the proposed Neighbourhood Plan Area includes a mineral resource block (West of Stevenage - Langley), between Preston and Stevenage as identified in the Minerals Consultation Area Supplementary Planning Document 2008, and a history of planning applications for mineral extraction.

Further details relating to previous planning applications can be provided should this be necessary.

It should be noted, when the Parish Council develops its vision and objectives for shaping development and growth within the neighbourhood, that minerals and waste matters will need to be taken into account as Minerals and Waste Local Plans form part of the Development Plan. New development and growth of an area results in the generation of waste and this will be an important aspect needing consideration in due course in addition to the need to avoid the sterilisation of minerals.

**LDF/07297**                      **10**                      **Shaw**  
**Document Section:**                      St Ippolyts Neighbourhood Plan  
**Representation:**                      *Object*

I disagree with the idea the whole area should become a new Neighbourhood Plan Area. However, should the Parish Council come forward and put "some meat on the bone", and promote a meaningful vision for a smaller, proper neighbourhood, one with a genuine goal in order to encourage development and growth within our village, then I may in future be able to support a more limited Neighbourhood Plan. We shall see.

At the moment, almost the entire Parish is currently designated with Green Belt since 1984. This in turn has severely restricted any opportunities for any vision or development or growth anywhere in the Parish. NHDC's own Annual Monitoring Reports record the following net housing completions by Parish for St Ippolyts as follows:-

2009-2010	-1
2010-2011	1
2011-2012	2 (and only within the Hitchin town settlement area)
2012-2013	0
2013-2014	0

Because, for now, all the Parish land is pretty much washed as Green Belt, (settlements & all) to date, as far as I can tell, for the past 30 years the Parish Councilors have never even contemplated any vision for development, growth or any sustainable opportunities. It seems to me the St Ippolyts Parish Council's application to NHDC may be putting the cart before the horse.

Instead, I believe the Parish Council should set out their stall, with their vision (similar to that leadership which NHDC showed when publishing the Preferred Options for the Draft Local Plan), having earmarked sites where development could take place within the Parish; then they could attempt to put forward some housing numbers, demographic aspirations, and identify small scale opportunities within the existing settlement envelopes here in the Parish.

But, I would much rather see a number of smaller neighbourhood areas; the Parish Council could then legitimately concentrate on identifying the extent of individual Neighbourhood Plan Areas within which they would support future growth and development. Unfortunately, at the moment, because the Parish Council have been so negative for so long, and their mind-set remains pretty much against any development anywhere in the Parish, I fear their initial considerations may be unhelpfully negative. It would be tantamount to putting a fox in charge of the chicken coop.

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On behalf of our Company we wish to continue to promote our land (adjacent to Sloe Hill, Mill Lane, Gosmore) for frontage housing only and for your officers and councillors to approve its inclusion in the revision of the preferred sites as per the issued programme.

The land is vacant and is available now for inclusion within the planning process and I enclose a plan edged red showing the area with it frontage to Mill Lane and possible housing Plots.

Also I enclose previous site plans and correspondence for proposed site ref No's 220 from our files.

I also confirm we have had notification from your officer at NHDC regarding the Neighbourhood Area designation to whom we will be sending copies of the enclosed documents for their consideration.

**LDF/04214**                      **15**                      **New Road Developments Ltd**

**Document Section:**                      St Ippolyts Neighbourhood Plan  
Representation:                      *Support*

**ADOC**                      **Additional document attached**

On behalf of our Company we wish to continue to promote our land at Site Hitchin Lane, St Ippolyts, Location Ref No 222 for frontage housing only and for your officers and councillors to approve its inclusion in the revision of the preferred sites as per the issued programme. The land is vacant and is available now for inclusion within the planning process and I enclose a plan edged red showing the area with its frontage to Hitchin Lane and possible Housing Plots. Also I enclose previous site plans and correspondence for proposed site ref No's 222 from our files. We will also provide a 5 metre Right of Way along the brook for the public to use.

**LDF/04588**                      **7**                      **Windebank**

**Document Section:**                      St Ippolyts Neighbourhood Plan  
Representation:                      *Object*

**MAP**                      **Map/plans attached**

See smaller area plan boundary attached. I propose that the area coloured red be the proposed area for St Ippolyts.

**LDF/04752**                      **25**                      **Hertfordshire County Council - Spatial and Land Use**

**Document Section:**                      St Ippolyts Neighbourhood Plan  
Representation:                      *Comment*

The proposed Neighbourhood Plan Area does not coincide with any of the county council's proposed waste site designations as shown in the Waste Local Plan. The area does however include a history of planning applications for waste facilities.

There is currently an operational sewage treatment works which is a safeguarded facility at Ashbrook located within the Neighbourhood Plan Area. In addition, Vicars Grove lies within the area which is undergoing re-restoration under the latest waste planning permission. Also, a site at Harness Hall, Thistley Lane, Gosmore within the plan area, has recently been issued planning permission to burn waste timber and plant material for preheating of water on the farm through the installation and use of a purpose built incinerator.

There is one other waste facility to be aware of which is located within close proximity of the Neighbourhood Plan Area. The existing end of life vehicle facility at Rush Green

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on a map. This is an effective way to identify the development proposals that could encroach on consultation zones and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs and the HSE advises that you contact the pipeline operator for up to date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence<sup>3</sup>.

### Identifying Compatible Development in Neighbourhood Plans

The guidance in PADHI - HSEs Land Use Planning Methodology available at <http://www.hse.gov.uk/landuseplanning/padhi.pdf> will allow you to identify compatible development within any consultation zone in the area of the neighbourhood plan. The HSE recommends that you include in the plan an analysis of compatible development type within the consultation zones of major hazard installations and MAHPs based on the general advice contained in the PADHI guidance. The sections on Development Type Tables (page 9) and the Decision Matrix (page 17) are particularly relevant and contain sufficient information to provide a general assessment of compatible development by class within the zones.

There are a number of factors that can alter a PADHI+ decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSEs final advice on development compatibility can only be determined through use of PADHI+

### Provision of Information to Interested Parties - Pipeline Operators

The pipeline operator/s referred to will be sent a copy of this representation to make them aware of HSE's preliminary advice on this matter.

### Key

<sup>1</sup> = Article 12 provides that the objectives of preventing major accidents and limiting the consequences of such actions are taken into account in land-use policies and these objectives should be pursued through controls on the siting of new establishments, modifications to existing establishments, and new developments in the vicinity of existing establishments such as transport links, locations frequented by the public and residential areas where the siting or development is such as to increase the risk or consequences or a major accident.

<sup>2</sup> = Hazardous substances consents are granted by the Hazardous Substances Authority (HSA) which is the planning authority. The consent process is regulated by the HSA under the Planning (Hazardous Substances) Regulations 1992 (as amended). The HSA must consult the HSE on consent applications. In assessing the application for consent, HSE will produce a map with risk contours (or zones), representing the risk to a hypothetical house resident. Should the HSA grant consent this map defines the consultation advice within which HSE must be consulted over any relevant future planning applications.

<sup>3</sup> = The HSE does not hold detailed versions of the pipeline maps. Therefore you are advised not to rely solely on the information contained in this representation as reflecting the current status of MAHPs that could affect the plan. Please refer to the sources of information eg to local authority pipeline records, as pipeline operators have a duty to supply information on pipelines including ownership of MAHPs the HSE has provided a source of pipeline information on the HSE extranet pages at: <http://extranet.hse.gov.uk/Land%20Use%20Planning/padhi/pipelines.htm>

**LDF/04214**      **14**      **New Road Developments Ltd**

**Document Section:**      St Ippolyts Neighbourhood Plan

**Representation:**      *Comment*

**ADOC**      **Additional document attached**



## Representations for St Ippolyts Neighbourhood Plan

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than 40 dwelling units per hectare.

Applicant

Agent

### Workplace Allocations

Inner Zone - Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250 m<sup>2</sup> total floor space are compatible with the inner zone.

Note Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator.

Middle Zone - The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000 m<sup>2</sup> are compatible with the middle zone.

Outer Zone - Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically for people with disabilities (eg sheltered workshops) are only compatible with the outer zone. Retail developments with more than 5000 m<sup>2</sup> total floor space are compatible with the outer zone.

This is a general description of the compatibility for housing workplaces. Detail of other development types for example institutional accommodation and education and their compatibility with consultation zones can be found in the section on Development Type tables (page 9) of PADHI - HSEs Land Use Planning Methodology, which is available at <http://www.hse.gov.uk/landuseplanning/padhi.pdf>

### Mixed use Allocations

Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to PADHI+ to determine HSEs advice regarding mixed-use developments.

### Verification of Advice using PADHI+

The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard installations and MAHPs can be found on the HSE extranet system along with advice on HSEs land-use planning policy. Lists of all major hazard installations and MAHPs, consultation zone maps for installation, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access the HSE Planning Advice for Developments near Hazardous Installations Information Package (PADHI+) on the extranet, further information is available on the HSE website: <http://www.hse.gov.uk/landuseplanning/padhi/htm>. When sufficient information on the location and use class of site comes available at the pre-planning stages of the neighbourhood plan, the use of PADHI+ could assist you in making informed planning decisions about development compatibility. We recommend that for speculative testing of advice that the PADHI+ training database is used. This is accessed on the land-use planning extranet services screen.

### Identifying Consultation Zones in Neighbourhood Plans

The HSE recommends that where there are major hazard installations and MAHPs within the area of the neighbourhood plan, that you mark the associated consultation zones

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		<p>Regulation 10(b) of the town and Country Planning (Local Planning) (England) Regulations 2012 requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents by pursuing those objectives through the controls described in Article 12 of Council Directive 96/82/EC(Seveso II)<sup>1</sup>. Regulation 10(c)(i) requires that regard also be had to the need in the long term, to maintain appropriate distances between installations and residential areas, buildings and areas of public use, major transport routes as far as possible and recreational area.</p>	
		<p><b>Scope of Advice</b></p> <p>At this early stage HSE can give a general opinion regarding development compatibility based only on the outline information contained in the plan. This opinion takes no account of any intention to modify, relinquish or revoke hazardous substances consents<sup>2</sup>. Planning authorities are advised to use HSE's Planning Advice for Developments near Hazardous Installations Information Package (PADHI+) to verify any advice given. Further information on PADHI+ is available on the HSE website: <a href="http://www.hse.gov.uk/landuseplanning/padhi.htm">http://www.hse.gov.uk/landuseplanning/padhi.htm</a></p> <p>PADHI+ cannot be used for developments around nuclear sites, explosive sites or quarries. In these cases you must consult the appropriate HSE directorate for advice. Guidance on consulting the HSE about developments that could encroach on specialist major hazard sites is also available on the website: <a href="http://www.hse.gov.uk/landuseplanning/padhi/faqs.htm#hazardous-substances-consent">http://www.hse.gov.uk/landuseplanning/padhi/faqs.htm#hazardous-substances-consent</a>.</p>	
		<p><b>Encroachment of Plan Boundaries and Consultation Zones</b></p> <p>The following consultation zones are within the proposed neighbourhood plan boundary.</p> <p>The neighbourhood plan boundary encroaches upon the inner, middle and outer consultation zone associated with a MAHP's operated by National Grid Gas Plc, as follows:</p>	
		<p>Pipeline: Whitwell/Dyes Lane Stevenage (1SYO) / HSE Ref No: 7521 / Transco Index No: 1780</p>	
		<p>Pipeline: Whitwell/Cadwell Lane (1UAO) / HSE Ref No: 7518 / Transco Index No: 1777</p>	
		<p>Pipeline: 3 Feeder Royston/Whitwell / HSE Ref No: 7595 / Transco Index No: 1849</p>	
		<p><b>Compatibility of Development with Consultation Zones</b></p> <p>The compatibility issues raised by developing housing and workplaces within the inner middle and outer zones are summarised below.</p>	
		<p><b>Housing Allocations</b></p> <p>Inner Zone - Housing is not compatible with development in the inner zone. PADHI+ would normally give an Advise Against decision for such development. The only exception is developments of 1 or 2 dwelling units where there is minimal increase in people at risk.</p> <p>Middle Zone - The middle zone is compatible with housing developments up to and including 30 dwelling units and at a density of no more than 40 per hectare.</p> <p>Outer Zone - Housing is compatible with development in the outer zone including larger developments of more than 30 dwelling units and high-density developments of more</p>	

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 resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.

Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again at consultations@naturalengland.org.uk

### **LDF/04119                      1                      Forestry Commission**

**Document Section:**                      St Ippolyts Neighbourhood Plan

Representation:                      *Comment*

Forestry Commission received a consultation request for the above neighbourhood plan, we have the following comments to make:

There are several woodlands in the plan area, these should be retained and if possible enhanced through appropriate active management. Management should include controlling the deer population in the area to ensure that seedlings and saplings are able to grow without being browsed off by deer. The population of fallow deer in the area is very high and at current densities is causing damage to woodlands and crops in the area, including the adjacent Site of Special Scientific Interest, Wain Wood. Expansion of the existing woodlands through planting more woodland adjacent to them would further enhance their environmental value, and make them more robust in the face of increasing pests and diseases affecting our native trees.

Vicar's Wood is recorded as an ancient semi natural woodland, which means it has been present since at least the year 1600, and probably longer. As such it is of high environmental and historic value and should be protected and enhanced through appropriate management. Again this is likely to include controlling the deer population and possibly reintroducing management such as the ancient woodland management practice of coppicing where there is evidence of this occurring in the past.

Forestry Commission can provide advice to land owners on the above and should do so before any woodland work is undertaken as it may require a felling licence.

### **LDF/04154                      3                      Health and Safety Executive (HSE)**

**Document Section:**                      St Ippolyts Neighbourhood Plan

Representation:                      *Comment*

Thank you for your request to provide a representation on the St Ippolyts Parish Neighbourhood Plan consultation document. When consulted on land-use planning matters, the HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved. HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process.

HSE gives advice on neighbourhood plans with reference to the condition that neighbourhood plans or Orders must be in general conformity with the strategic policies of the Local Plan, and that neighbourhood plans or Orders must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant (Planning Practice Guidance - Neighbourhood Planning - Para 065). Our advice therefore is given with consideration to the following.

Paragraph 172 of the National Planning Policy Framework (NPPF) requires that planning policies should be based on up to date information on the location of major accident hazards and on the mitigation of the consequences of major accidents.

## Representations for St Ippolyts Neighbourhood Plan

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Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. This is available at: [http://webarchive.nationalarchives.gov.uk/20140328084648/http://cdn.environmentagency.gov.uk/lit\\_6524\\_7da381.pdf](http://webarchive.nationalarchives.gov.uk/20140328084648/http://cdn.environmentagency.gov.uk/lit_6524_7da381.pdf)

Local environmental record centres hold a range of information on the natural environment. A list of local records centre is available at: <http://www.nbn-nfbr.org.uk/nfbr.php>

### Protected landscapes

If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), we advise that you take account of the relevant National Park/AONB Management Plan for the area. For Areas of Outstanding Natural Beauty, you should seek the views of the AONB Partnership.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment.  
<http://www.naturalengland.org.uk/publications/nca/default.aspx>

### Protected species

You should consider whether your plan or proposal has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.

### Natural England Standing Advice

#### Local Wildlife Sites

You should consider whether your plan or proposal has any impacts on local wildlife sites, eg Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) or whether opportunities exist for enhancing such sites. If it appears there could be negative impacts then you should ensure you have sufficient information to fully understand the nature of the impacts of the proposal on the local wildlife site.

### Best Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. Paragraph 112 of the National Planning Policy Framework states that:

'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'.

General mapped information on soil types is available as 'Soilscapes' on the [www.magic.gov.uk](http://www.magic.gov.uk) and also from the LandIS website; <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.

### Opportunities for enhancing the natural environment

Neighbourhood plans and proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural



## Representations for St Ippolyts Neighbourhood Plan

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Conservation Area (Gosmore and St Ippolyts) each of which contain a number of listed buildings, plus some 25 listed buildings dispersed throughout the rest of the parish. While the majority of these buildings are at listed at Grade II, they also include the Grade I listed parish church of St Ippolyts, plus a series of important Mediaeval buildings comprising the 13th century Grade I Manor House of Almshoe Bury, the late Mediaeval Grade II\* former hall house at Maydencroft Manor together with its Grade II\* late 16th century barn, and the Grade II\* listed late Mediaeval Avenue Farmhouse. It will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

We consider that the planning team and historic buildings conservation officer at North Hertfordshire District Council will be best placed to assist the parish in the development of their Neighbourhood Plan and, in particular, how the strategy might address the area's heritage assets. Consequently, we do not consider that there is a need for English Heritage to be involved in the development of this plan, but we would welcome the opportunity to comment on the pre-submission draft in due course.

Furthermore, we would recommend that the Parish consult the Historic Environment Record to gain advice on designated heritage assets and archaeological matters, together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available on-line via the Heritage Gateway ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)). It may also be useful for the Parish to involve local voluntary groups such as the local Civic Society or local historic groups in the production of their Neighbourhood Plan.

English Heritage has produced a number of documents which the parish might find helpful in helping to identify what it is about their area which makes it distinctive and how they might go about ensuring that the character of the area is retained. These can be found at:-

<http://www.english-heritage.org.uk/caring/get-involved/improving-your-neighbourhood/>

The Parish Council may also find the advice in "Planning for the Environment at the Neighbourhood Level" useful. This has been produced by English Heritage, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information.

In the event that St Ippolyt's application for designation as a Neighbourhood Area is successful I would be grateful if you would provide them with a copy of this letter.

**LDF/03117**      **24**      **Natural England - East of England Region**

**Document Section:**      St Ippolyts Neighbourhood Plan  
*Comment*

Representation:  
Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning. We must be consulted on draft Neighbourhood Development Plans where the Town/Parish Council or Neighbourhood Forum considers our interests would be affected by the proposals. We must be consulted on draft Neighbourhood Development Orders and Community Right to Build Orders where proposals are likely to affect a Site of Special Scientific Interest or 20 hectares or more of Best and Most Versatile agricultural land. We must also be consulted on Strategic Environmental Assessments, Habitats Regulations Assessment screening and Environmental Impact Assessments, where these are required. Your local planning authority will be able to advise you further on environmental requirements.

The following is offered as general advice which may be of use in the preparation of your plan.







## Representations for St Ippolyts Neighbourhood Plan

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level to avoid a piecemeal approach to development.

Agent

Surface Water and Flood Risk

Appropriate management of flood risk and the consideration of climate change is critical for long term resilience.

Whilst fluvial flooding is a significant constraint to the location of development, other forms of flooding such as surface water should be a consideration. All developments should seek to reduce flood risk and incorporate Sustainable Drainage Systems (SuDS). We would wish to see that all developments should adhere to the surface water management hierarchy outlined in Part H of Building Regulations with disposal to a surface water sewer seen as a last resort. Under no circumstances will surface water be permitted to discharge to the public foul sewerage network.

Any brownfield sites marked for redevelopment must take the opportunity to completely remove or significantly reduce any surface water flows currently discharging to the surface water network. The demolished site should be, where practical, treated as if it was greenfield. Brownfield sites must still follow the surface water management hierarchy to determine whether infiltration techniques or a connection to a watercourse can be utilised prior to the consideration of a connection to a public surface water sewer.

Protection of our assets

Where there are sewers crossing the site, the site layout should be designed to take these assets into consideration. The existing infrastructure is protected by an easement and should not be built over or located in private gardens as access for repair and maintenance will be restricted. The sewers should be located in the highway or in public open space. All sites will also need to be a suitable distance from our pumping stations and Water Recycling Centres. Further details can be found at <http://www.anglianwater.co.uk/developers/planning/encroachment.aspx>

Pre Planning Service

Anglian Water offers a pre planning service which includes a capacity check to determine the impact of a proposed development. We will work with the customer during this process to develop foul and surface water (where applicable) drainage solutions which will not cause a detriment to our existing or future customer. We would encourage the prospective developer to contact us at the earliest convenience to discuss drainage proposals to serve the development. Details regarding this service can be found at <http://www.anglianwater.co.uk/developers/pre-planning-service-.aspx>

**LDf/00755**                      **24**                      **Beechwood Homes Ltd**

**JB Planning Associates**

**Document Section:**                      St Ippolyts Neighbourhood Plan  
*Comment*

**MAP**

**Map/plans attached**

Representation:  
Thank you for contacting me with regard to the above consultation, which I understand that North Herts Council is holding on behalf of St Ippolyts Parish Council. The consultation seeks to define the area to which a future Neighbourhood Plan for St Ippolyts should relate. The current proposals are for the Neighbourhood Plan to simply relate to the Parish boundary, which covers a relatively large area, including over 300 homes on the edge of Hitchin, and our Client's land north of Pound Farm, which is proposed for a development of around 67 dwellings.

As you will be aware, a Neighbourhood Plan must be consistent with the spatial strategy and any specific proposals set out in a higher level Local Plan. The emerging draft North Hertfordshire Local Plan 2011 & 2031 is at a relatively advanced stage, and is based on several years' research and numerous consultations into potential site allocations. As such, it is necessary for the emerging Neighbourhood Plan to follow a similar approach to that advocated in the emerging Local Plan, to ensure that it will

## Representations for St Ippolyts Neighbourhood Plan

<u>Ref.</u>	<u>Rep.No.</u>	<u>Applicant</u>	<u>Agent</u>
<i>Comment</i>			
Representation:			
Thank you for consulting us with the above Neighbourhood Area Designation. We have no comments to make on this designation. However, we would be keen to engage with you and St Ippolyts Parish Council as the Neighbourhood Plan progresses. In particular, we can provide advice on flood risk, water resources, contamination, groundwater, sustainable drainage and watercourses. I look forward to hearing from you as the Neighbourhood Plan move forwards.			

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<b>LDF/00057</b>	<b>53</b>	<b>Stevenage Borough Council</b>	
<b>Document Section:</b>		St Ippolyts Neighbourhood Plan	
<i>Comment</i>			
Representation:			
Thank-you for notifying us of St Ippolyts Parish Council's application for designation of a Neighbourhood Plan Area. The application is for the whole of the parish area and the Parish Council is therefore the relevant body under the necessary acts and regulations. As such, we have no specific comments to make.			
We would obviously be interested in hearing about, or participating in, any (formal or informal) neighbourhood planning activities within the Parish in the future.			

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<b>LDF/00384</b>	<b>164</b>	<b>Anglian Water Services Ltd</b>	
<b>Document Section:</b>		St Ippolyts Neighbourhood Plan	
<i>Comment</i>			
Representation:			
Thank you for consulting Anglian Water on the Neighbourhood Plan for St Ippolyts.			
I do not have any comments to make on the area of designation. Please note that the Anglian Water do not supply the potable water in the area, we only provide the sewerage service.			
I have some initial high level comments for your consideration which I will outline below. I will be happy to review sites put forward for allocation and provide site specific comments from a supply, capacity and asset encroachment perspective.			

Water Recycling Centre Capacity

The used water flows generated from any future growth will have an impact on Ashbrook Water Recycling Centre (WRC) formally known as Sewerage Treatment Works. We are unable to comment on the impact of growth at this early stage of your plan. Any required upgrades will be funded by Anglian Water however they will need to be planned and funded through our 5 year business plan, approved by our economic regulator Ofwat.

Sewerage Network

The used water flows from future growth will have an impact on the existing used water network. The used water infrastructure requirements will be dependant on the location, size and phasing of the development. All sites will require a local connection to the existing sewerage network which may include network upgrades. Upgrades will be funded by developers through the provisions of the Water Industry Act 1991 and will not be required to form part of the CIL provisions.

We would want the document to clearly state that a used water drainage solution will need to be identified and implemented prior to occupation. This should be at a strategic

## Representations for St Ippolyts Neighbourhood Plan

### St Ippolyts Neighbourhood Plan

Ref. Rep.No.

**LDF/00022** 76

Applicant

**Moore**

Agent

**Document Section:** St Ippolyts Neighbourhood Plan

*Object*

**MAP** **Map/plans attached**

Representation:

For many years now, I have been urging Parish Councillors to become more pro-actively involved with a Parish Plan/Neighbourhood Planning; having suggested they should try to formulate some sort of idea as to where future housing should go. Consequently, at least now someone has tried to start getting the ball rolling, at long last.

However, ironically, without they yet providing any other detailed proposals from the Parish, all that is currently being sought is to re-use the same Parish boundary, now proposed for an identical "new" Neighbourhood Plan boundary; but without yet providing any justification or background explanation.

As you pointed out in your leaflet, the primary purpose of introducing Neighbourhood Plans into the planning system under the Localism Act 2011 was supposedly in order to give local communities more power and to help them develop a vision for their neighbourhood and to shape development and growth within the settlements. But thus far, the Parish Council have failed to promote a single idea in this direction. Worse, having previously conducted a Housing Need Survey for St Ippolyts in 2011, to date they then completely failed to act on any of it's findings. This despite the cost to rate-payers, whose money in this regard has again been wasted.

I would also be very concerned if the whole Parish Area is to be considered for a Neighbourhood Plan. Specifically, I don't believe the parts of the Parish within the Hitchin settlement area, nor the new proposed site north of Pound Farm are necessary to be included in any future St Ippolyts Neighbourhood Plan. It should be much more local.

In addition, the area the District Council have recently identified to meet possible future needs for the Borough of Stevenage, (West of Stevenage), I believe this should also be excluded from any current Neighbourhood Plan proposals.

Granted, establishing a boundary is a small first step; however, in my opinion we think it would only be sensible to support a more limited Neighbourhood Plan area; one which would concentrate on informing and supporting future growth and any development in the two principal villages of Gosmore and St Ippolyts, with possible consideration to include the Hamlets at St Ibbs and Little Almshoe. (see attached).

Having the Parish Council done almost nothing over the past decade to either develop a vision for their neighbourhood, or to shape any development and growth within that neighbourhood, I am far from convinced that current Parish Councillors are at all likely to suddenly change their spots and become all enthusiastic and positive about any future small-scale growth/opportunities. I suspect their latest idea for a Neighbourhood Plan may only end-up becoming a negative drag on future opportunities, rather than achieving any enlightened vision or meaningful support going forward.

Be that as it may; I have volunteered to serve on their future working group and I am therefore happy in principal to support the first step of establishing a more limited new Neighbourhood Plan Area; but one that would only include the two villages of Gosmore and St Ippolyts and the two hamlets of St Ibbs & Little Almshoe.

Personally, I think it would be a complete folly to assume the entire Parish should suddenly be the subject of just an entire new Neighbourhood Plan. Conversely, I believe it's much more logical for a future informed Plan, (one that hopefully proposes some growth/vision) to simply cover the existing settlement areas; much more localised. Likewise, for the small northern part of the Parish which now lies within Hitchin's settlement area, that community will have its own needs & vision, being almost certainly entirely different from that of our rural communities.

**LDF/00025** 42 **Sustainable Places ,Environment Agency**

**Document Section:** St Ippolyts Neighbourhood Plan