

Ashwell Neighbourhood Plan regulation 16 submission  
consultation statement

# Ashwell Neighbourhood Plan Consultation Statement

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# Ashwell Neighbourhood Plan Consultation Statement

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## 1 Introduction

- 1.1 This Consultation Statement has been prepared in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012, which requires that a consultation statement should:
- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted; and
  - describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.
- 1.2 When regulations were introduced in 2012 to empower Neighbourhood Plans, Ashwell Parish Council resolved to develop a Neighbourhood Plan (the Plan) of its own. Work began in October 2013 with a body comprising a Parish Councillor chairman and seven volunteers. They formed the Working Group overseeing the project. This group laid the foundation for the creation of an evidence-based Plan, bringing together numerous volunteers to form sub-groups to focus on particular topics as the work progressed.
- 1.3 Over the next seven years the Plan progressed to the point where it is now ready for submission to the Planning Authority, North Hertfordshire District Council (NHDC), for examination according to Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.4 This document explains the stages that the Plan went through to make it fit for submission.

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

- 2.1 An important part of the process has been to ensure that all residents, businesses and others with an interest in the Parish have had an opportunity to contribute.
- 2.2 In the case of Ashwell this may have been somewhat easier than in other areas as it is a self-contained settlement and residents exhibit a high level of engagement in the social life of the Parish in general. This has provided opportunities to communicate with residents on the back of other activities, for example the annual 'Ashwell at Home' event.
- 2.3 The programme of engagement, consultation and plan formation is summarised in Figure 2.1 .

Date	Key activities or issues	Milestone / outcome
May 2013	Parish Council tasks member with setting up a Neighbourhood Plan Working Group	Formal approval to create a Neighbourhood Plan
October 2013	Working Group first meeting	Work on Neighbourhood Plan starts. Core Working Group established
October 2013 to December 2014	Scope definition and data gathering (e.g.: previous surveys, design statements, guidelines) Designing the Housing survey	
January 2015	Public meeting, with over 200 attending. 17 residents recruited and 9 sub-groups set up to look at separate areas of policy.	Fully constituted Working Group and sub-groups established.
June to July 2015	Ashwell Housing Survey 2015	Conclusions produced to inform the Neighbourhood Plan policy areas on housing Neighbourhood Plan 'vision' defined
May 2016	Draft Neighbourhood Plan sent to NHDC for initial comment	NHDC provides feedback
June 2016	Ashwell Business Survey 2016	Conclusions produced to inform the Neighbourhood Plan policy areas regarding business
Jan / Feb 2017	Ashwell Second Survey 2017	Conclusions produced to inform the Neighbourhood Plan policy areas regarding use of local services, attendance at events,

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Date	Key activities or issues	Milestone / outcome
		education, health, environment, recreation, traffic and transport.
April 2017 to August 2018	Survey evaluation and Plan drafting	First regulation 14 draft Neighbourhood Plan produced
September to October 2018	First regulation 14 consultation carried out	First regulation 14 consultation completed, with significant modifications required
May 2019 to June 2020	Advice taken, research conducted to generate additional data, major redrafting and plan additions	Second regulation 14 draft Neighbourhood Plan produced
July to September 2020	Second regulation 14 consultation carried out	Second regulation 14 consultation completed with some modifications considered necessary
October to December 2020	Analysing comments received at Regulation 14 consultation and preparing the Submission Version Plan and accompanying documents.	Final Plan submitted to NHDC.

Figure 2.1 Key activities, issues, milestones and outcomes when developing the Ashwell Neighbourhood Plan

## 3 Principal stages in preparation of the Plan

- 3.1 The Working Group and sub-groups built up the Plan in stages, which were:
- Initiation
  - Communicate and seek input
  - Prepare a draft Plan for the first pre-submission (Regulation 14) consultation
  - Revise the draft Plan for the second pre-submission (Regulation) consultation
  - Preparing the Submission Version (Regulation 16) Neighbourhood Plan
- 3.2 It should be noted that as the Plan was a living document that has evolved during its development, the early stages overlapped to some degree.

### Initiation - May 2013 to January 2014

- 3.3 By resolution 6.2.1 (Appointments and nominations) of Ashwell Parish Council's AGM on 01-May-2013, a delegated member was tasked with setting up a Working Group to lead the development of the Neighbourhood Plan. Following an appeal, seven volunteers came forward who were acknowledged in the 04-Sep-2013 Parish Council meeting (item 53.1). The Working Group's first meeting was on 31-Oct-2013 when those attending formally set up the committee and appointed a chairman and vice-chairman.
- 3.4 In the three months following its formation, this group set out a project plan to enable the creation of an evidence-based Neighbourhood Plan by:
- Defining an initial scope for the Plan
  - Working out how to gather data
  - Designing a parish survey

### Communicate and seek input - January 2014 to August 2018

- 3.5 From early in 2014 the Working Group communicated with and encouraged input from local people and businesses through a combination of local media, surveys and public events. The following paragraphs describe the means by which the Working Group established Sub-Groups and maintained a continuing conversation with parishioners and other interest groups.

#### *Inviting participation in sub-groups*

- 3.6 In the period January to March 2015, posters in the village and advertising in Ashwell Village News appealed for volunteers to help with formulating the Plan. As a result the Working Group set up nine Sub-Groups corresponding to a set of broad topic areas that would underpin dialogue with the community:
- Housing
  - Business
  - Education

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- Sport and recreation
- Natural environment / character areas
- Tourism
- Elderly and health
- Ashwell Village Design Statement
- Transport

3.7 The campaign for volunteers continued with periodic reminders until July 2016.

### *Media and public relations*

3.8 The following publications were used throughout the process to keep people informed of progress on the Plan:

- Ashwell Village News: a monthly publication sponsored by the Parish Church, which is on sale at retail outlets in Ashwell at a modest cost. In it there were regular reports on Neighbourhood Plan progress, including invitations for comment and requests for contributors from June 2015 to August 2018.
- Yearbook: an annual publication distributed to all households in Ashwell Parish. It a quality publication containing articles about the activities of the many organisations in Ashwell. It is well read and valued by residents. Every year there has been a status report on the Neighbourhood Plan from the 2016 edition (covering 2015) to the 2020 edition.

### *Surveys*

3.9 The Working Group has proactively sought views from the community at regular intervals:

- Ashwell Housing Survey 2015:  
A key consideration within the Plan has been to understand what sort of housing is required at the local level. In June and July of 2015, the Working Group asked parishioners about their current and likely future housing needs, covering the following topics:
  - Demographic profile of respondents vs 2011 Census
  - Current housing type & future housing needs for the family
  - Views on quantity of additional housing for Ashwell
  - Views on the type of additional housing needed
  - Views on the type and size of additional housing developments for Ashwell
  - Views on the location for additional development in Ashwell

The survey was completed by 341 household, representing 43% of households in the Parish. The results were analysed and presented in the document attached at Appendix A1. In particular, the survey revealed a desire

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to maintain the 'village' status and feel of Ashwell, with a call for smaller (in terms of number of bedroom) homes to address the needs of those starting out on the housing ladder as well as those wishing to downsize locally. It was felt that new development should be of a scale in-keeping with the current size of the settlement, and that new build should complement the character of the area as well as safeguarding special views, such as of the Church.

### ■ Ashwell Business Survey 2016

A survey of local businesses generated 22 replies with the results being analysed and presented in the document attached at Appendix A2. The survey did not reveal a single consistent picture or a core list of significant issues. Perhaps this is unsurprising because, while businesses in Ashwell are all small in scale, they are diverse. The majority of responses indicated that trade was stable (neither growing nor declining) and sustainable. In addition the survey revealed that:

- Limited customer parking and poor broadband speeds affect some businesses
- Some businesses benefit from events such as 'Ashwell at Home', the Ashwell Show and 'Ashwell at Christmas', but in general an influx of tourism does not consistently increase trade.

### ■ Ashwell Second Survey 2017:

A further survey was undertaken in 2017 asking more specific questions about the non-housing themes of the Plan such as health, recreation, environment and transport. The survey was completed by 316 households, representing 40% of the households in the Parish. The results analysed and presented in the document attached at Appendix A3. The survey revealed information that would help the Sub-Groups and Working Group in developing their draft policies.

### *Face to face and public meetings*

3.10 The Working Group promoted the Plan and how to get involved in it at a number of public events, for example:

- Public meeting at Ashwell School, 10-Jan-2015: the Plan Working Group organised the meeting to give parishioners the opportunity to ask questions and state their views. Oliver Heald MP and District councillors attended and 206 parishioners took part.
- Meeting with local businesses in March 2015 to explain the work being undertaken and understand their needs

### *Other events*

3.11 During the annual Ashwell 'at home' day in May 2015, the Neighbourhood Plan Working Group set up a stand in a prominent place in the village.

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Figure 3.1 Neighbourhood Plan Working Group members in conversation with Parishioners, Ashwell 'at home', May 2015

- 3.12 There were also displays at the village's regular public events such as the annual Horticultural Society's Autumn Show and the Parish Council Annual General Meeting, 25-Mar-2015, with updates at subsequent AGMs.

### *Information published by bodies with an interest in planning*

- 3.13 Formulation of the Neighbourhood Plan also drew on a stock of relevant documentation, principally (but not exclusively):
- District Local Plan No.2 with alterations originally adopted April 1996 (current terminology used)
  - NHDC emerging Local Plan (as modified)
  - National Planning Policy Framework 2012
  - Local Development Framework, Design Supplementary Planning Document 2011
  - Ashwell Parish Plan
  - Ashwell Village Design Statement 2000
  - Ashwell Village appraisal 1994-5

A full list of evidence documents drawn from is contained in the Plan.

## **Prepare a draft Plan for the first pre-submission (Regulation 14) consultation -August 2015 to August 2018**

### *Plan preparation*

- 3.14 The first two stages of the Plan programme provided the Working Group with ideas about the scope and content of the plan and enabling them to start developing potential policy ideas. The consultation that followed was instrumental in refining these ideas and developing the policies themselves.

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- 3.15 Successive rough drafts of the emerging policies were created and consulted on as the process evolved, built upon the evidence and feedback received. Each policy included a detailed justification with background information and analysis to explain why they were there and why they were important.

### *Early draft Plan*

- 3.16 By Spring 2016, communication and feedback gathering had progressed to the point where it was possible to work up a rough draft of the Plan, which the Working Group passed to NHDC for early comment. This early draft included a series of potential site allocations for new homes. NHDC provided the following feedback:

- The existing Ashwell Village Design Statement in its entirety, could be included within the Plan, as this would be a way of giving it additional weight in planning decisions. Previous to this, only parts of the Design Statement had been brought into Supplementary Planning Documents held at the District level.
- The sites identified in the Ashwell draft plan would need to be assessed against a number of criteria used by NHDC, as this would be a more consistent approach with the Local Plan and would provide evidence of their availability and suitability. At this time, whilst sites had been identified, they had not undergone a rigorous assessment.
- There were a number of policies in the draft Plan that were not strictly planning policies which could be included as an addendum.
- Comments about the formatting of the document included the suggestion to include findings from the various surveys directly into the Plan, to help illustrate points that had been identified as important objectives.

### *First Pre-Submission (Regulation 14) draft preparation*

- 3.17 In addition to the input from NHDC, further material came from parishioners over the period between May 2016 to the end of 2017, mainly via the business and second survey. By the beginning of 2018 the Working Group was ready to compile the Pre-Submission Version Neighbourhood Plan, re-drafting policies and supporting narrative in order to address the points raised. The most significant of these were:

- The lack of properties in Ashwell suitable for older people to allow residents to downsize
- A desire to have smaller units of up to three bedrooms built to provide starter homes and homes within the means of ordinary people
- Concerns that Ashwell should not grow into a town and that individual developments should be kept to a reasonable size, focusing on brownfield and infill sites
- The provision of off-street parking for new development is important
- A wish to preserve the character of the village and its views

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- Residents value the environment and the Springs and Quarry are valuable assets. Recreation facilities are adequate but the footpath network could be improved
- Facilities like the pharmacy, parish rooms post office, doctor and dentist surgeries, bakery and butchers are important to residents
- Parking and speeding are a problem.

3.18 The Working Group's re-write of the August 2018 Draft Neighbourhood Plan resulted in a significantly changed document, with edits reflecting the points listed in paragraphs 3.16 and 3.17, above.

In particular it is worth pointing out that, at the time the Working Group considered that identifying sites for development in policies 1.d to 1.f would be a way of dealing with the first three points about the configuration of future development, and its scale.

### *First Regulation 14 draft consultation*

3.19 At the beginning of June 2018, the Working Group and Parish Council considered that the Pre-Submission Version Plan was ready to go to Regulation 14 consultation so it started the process.

### *Planning, preparation and timing*

3.20 The consultation exercise took place over six weeks between September and October 2018. From June 2018, the Working Group had begun to inform parishioners about this by advertising in successive editions of the Ashwell Village News and with posters placed around the village.

### *Communicating the content of the Plan:*

3.21 Details of the plan were made available via the channels below:

- Exhibition in St. Marys Church from 1 September to 13 October 2018
- Public meeting, Saturday 15 September
- Copies of the Plan available to view at popular village locations: Rhubarb and Mustard, the Bushel & Strike, the Rose & Crown and the Three Tuns
- Publication of the Plan and supporting documents on the Parish website

### *Obtaining responses*

3.22 Parishioners and others with an interest in the life of the Parish responded to the consultation either by emailing in their comments or by completing a questionnaire. The Working Group delivered one paper copy of the response form to every household and business in the Parish, with additional copies being available on request. There was also the option to respond online.

3.23 A copy of the questionnaire is attached at Appendix A4. It reproduced each of the Plan's policies and asked the respondent whether they agreed, disagreed or had no opinion about the specific policy. There was also a space against each policy for free text comments.

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3.24 In total 113 responses came in from the community and the Working Group recorded these on a spreadsheet, including the free text comments, anonymising the data, see Appendix B.

### *Statutory consultees:*

3.25 As required by the Regulations, the Working Group contacted the relevant organisations as well as others considered to have a legitimate interest in the Plan, including local landowners and developers. Appendix C contains the full list of those written to. Aside from NHDC, responses were received from four developers.

### *Analysis of feedback on the first Regulation 14 draft consultation*

3.26 Feedback from NHDC: as the planning authority for the area, the district council made a number of comments. From these it became apparent that significant changes to the Regulation 14 draft would be advisable. In summary they were:

- Instances where there was lack of clarity about the village settlement boundary and its relationship with the one defined in the emerging Local Plan.
- The Plan would need to be screened to determine whether or not a Strategic Environmental Assessment (SEA) and/ or Habitats Regulations Assessment would be required. It was NHDC's view that a full SEA would probably be required if sites were to be included.
- The criteria used to identify the selected sites were too narrow and the evidence supporting the need for housing for older people on these sites was not strong enough.
- The Plan should assess the situation of older households living in market housing and of growing children living in affordable and /or market housing who are unable to afford to leave home and set up their own household.
- The Plan offered an ideal opportunity to identify Local Green Space and this should be considered.
- The Neighbourhood Plan could identify non-listed buildings of local interest. This would link in with the emerging Local Plan which includes Policy, HE3 Local heritage.
- The Plan should be reviewed in the light of the main modifications to the emerging Local Plan that were about to be published, and the site allocations contained within it.

Other than NHDC the following statutory consultees replied. Much of the feedback was supportive but, for the sake of brevity, the list below focuses on gaps or oversights:

- The Forestry Commission (no comment and referred the Working Group to Natural England)
- Hertfordshire Constabulary (a reference to security standard 'Secured by Design' requested)
- Hertfordshire County Council. The County Council made a wide range of comments:

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- ❑ concern over the impact that sites for development identified in the Neighbourhood Plan would have on the landscape, rights of way and ecology,
  - ❑ failure of the Plan to translate aspirations about the environment and ecology into policies that are relevant to planning and development,
  - ❑ not enough consideration of green infrastructure or the possibility of identifying Local Green Spaces,
  - ❑ a need to take into account the Local Landscape Character Assessment,
  - ❑ protection of trees,
  - ❑ inadequate reference to sustainable drainage, light pollution and climate change
  - ❑ adequacy of primary school provision in the village,
  - ❑ lack of clarity on how the Neighbourhood Plan will conserve the Historic Environment,
  - ❑ not enough consideration of sustainable modes of transport including footpaths and the creation of new public rights of way,
  - ❑ the possible unintended consequences of draft traffic and parking policies, and their compatibility with the County Council's policies.
  - Hertfordshire Gardens Trust (Ashwell Bury could be included in the list of designated heritage assets)
  - Highways England (no comments)
  - Historic England: also made detailed comments:
    - ❑ wording used for policies in the Neighbourhood Plan presents them as considerations not formal policies leading to lack of clarity around site allocations,
    - ❑ inadequate consideration of heritage impacts of the site allocations and the need for a Strategic Environmental Assessment,
    - ❑ overlooked opportunity to nominate Local Green Spaces and Assets of Community Value.
  - Sport England (highlighted the importance of NPPF paras. 96 and 97 and provided information on sources of reference when formulating policy on recreation)
- 3.27 Responses from parishioners and other local interests: several key themes were apparent:
- Concern about development creating yet more pressure on village infrastructure: the school, health provision, drainage and flooding.
  - Reducing traffic and street parking was a priority.

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- Each new development should be small in size (less than 10 units) and use brownfield sites rather than greenfield, though the developers consulted disagreed with this view.
- Encouraging new business did receive support but not to the extent of allowing a business park in the area.
- Concern about how sites had been identified and assessed for inclusion in the Plan.

3.28 Overall, the consultation was a valuable exercise not least in illustrating where more work was needed to develop the Plan into a document that would be fit for purpose.

3.29 Bearing in mind that additional work would be required, North Hertfordshire District Council issued an SEA and HRA Screening Request in March 2019 of the Ashwell Neighbourhood Plan (Version dated 31 August 2018). The three statutory consultees – Environment Agency, Historic England and Natural England – were sent the standard NHDC screening template alongside a copy of the draft Neighbourhood Plan.

Responses were received from Historic England and Natural England and the Determination Statement issued in April 2019 found that whilst an HRA was not required, an SEA was recommended because of the potential impacts that some of the proposed sites could have on the historic environment.

### September 2018 to September 2020: Revise the draft Plan for the second pre-submission (Regulation 14) consultation

#### *Second Regulation 14 draft preparation*

3.30 Having considered the responses to the first Regulation 14 Consultation, in November 2019 the Working Group embarked on a re-write, taking account of NHDC's input, comments from other consultees and the general themes emerging from the consultation. Furthermore, it sought the advice of a consultant to provide specialist advice on preparing neighbourhood plans and who was able to revisit the findings of the surveys conducted in 2015, 2016 and 2017. Work was undertaken to address the following:

- Planning policies versus community aspirations: It was clear from the comments received at the first Regulation 14, that some of the policies would be better couched as 'community actions/aspirations'. It is important to retain these. However they would need to be put into a separate chapter of the Plan.
- Duplicating policies: There are instances where the policies in the draft Plan were largely duplicating those contained in the District's emerging Local Plan. These would need to be identified and streamlined, but not necessarily cut out because the Local Plan was not yet finalized..
- Robust evidence: The current evidence contained in the Plan and supporting documents would be reviewed to understand if it was sufficient to justify each policy and where additional evidence may be required.

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- Policy wording and conformity: Checking that the policies are worded appropriately and are in general conformity with the National Planning Policy Framework and the adopted version of the North Herts District Plan. Whilst the emerging Local Plan is not yet adopted, it is at a stage where it is well-progressed and neighbourhood plan policies should therefore seek to synchronise with these.
- Policy gaps: There were examples of policies that are currently not included in the Plan and which the Working Group may wish to explore. For instance, a policy to designate Local Green Spaces, to safeguard them from future development.
- Mapping – The plan would need a Policies Map and potentially other maps to help illustrate what was being sought.

3.31 The comments received led the Working Group to rethink a number of the policies contained in the Plan. Notably a decision was taken not to allocate housing sites. The emerging NHDC Local Plan, currently at Examination, is proposing to allocate a site in Ashwell Parish for 33 homes and amend the settlement envelope to enable modest further growth as considered appropriate for the Parish over the lifespan of the plan. This is in addition to 62 homes that have either been built or have planning permission since 2011 (the start date of the emerging Local Plan).

3.32 The emerging Local Plan does not provide an expectation for Ashwell Parish Council to deliver a particular number of houses above those set out in the strategic allocation. It is considered that the site for 33 homes, combined with opportunities provided by the extension to the settlement boundary, will adequately address housing quantity required in the Parish.

3.33 Therefore, the Working Group considered that it would be better placed focussing its work on setting out the criteria to which any new development should adhere, in respect of design, housing mix and affordability. As a result, NHDC wrote again to Historic England, the Environment Agency and Natural England to understand if this would alter their recommendations about the need for an SEA. A new Determination Statement was issued in June 2020 stating that as sites were not to be included, then the SEA would not be required. Indeed, the emerging new Plan contained a series of policies that would serve to protect heritage and natural assets within the Parish. Whilst an SEA was not required, the Working Group developed a Sustainability Statement to accompany the Plan, setting out how sustainability matters had been considered when constructing the policies.

3.34 Further amendments to the Plan at this stage included the inclusion of a Local Green Space policy.

### *Second Regulation 14 draft consultation, planning, preparation and timing*

3.35 In July 2020, the redraft was sufficiently advanced to justify planning for a second Pre-Submission Version (Regulation 14) consultation. This was complicated by the Covid-19 restrictions. However, the Working Group Chairman and other Parish Council

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representatives devised an approach acceptable to the Working Group as a whole and which was in line with the advice received from Locality. The approach was to:

- distribute leaflets to all households in the Parish informing them of why a new consultation is required, why it is important, how to get further information and how to contribute
- encourage all those who wanted to respond to do so by reading the Plan and using an online questionnaire to provide feedback
- Put all documentation online, available for public access
- Contact all statutory consultees as before (i.e. by email) and ask for a reply by email

3.36 Those people wanting to respond who either did not have access online or did not wish to do so online could request a hard copy of the questionnaire and the full draft plan. Delivery was by hand observing social distancing rules.

3.37 A copy of the questionnaire is attached at Appendix A5. Like the previous consultation the questionnaire was based on the draft Plan policies with each having a heading and a brief summary of the issues explored in the Plan. The questionnaire quoted each policy in full and invited a response that could either be agree, disagree or express no opinion, with space for free text comment. There was also a section at the start where respondents could record comments about the Plan in general.

3.38 Because of the Covid-19 restrictions, a period of eight weeks was allowed for the consultation, rather than the required minimum of six weeks. It began on 6 July 2020 and was to end on 30 August 2020, but in practice the period was extended by two further weeks to 13 September 2020. This was reasonable given that there were some initial problems with the online form that had not been picked up in testing.

### *Communicating the consultation and the content of the plan*

3.39 Restrictions on public contact meant that exhibitions and meetings were not appropriate methods of telling local people about the consultation and what the redrafted Plan contained. Therefore communication of both the consultation and the Plan itself relied on the channels below:

- Leaflet to all dwellings in the parish
- An Ashwell Village News advertisement before the consultation and a reminder two weeks before the (original) 30 August 2020 finish
- Details published on the Ashwell Mums Facebook pages
- Posters on Civil Parish and Parish Church room noticeboards advertised the start of the consultation. Posters notifying people of the extension to 13 September were displayed on the Civil Parish noticeboard and in other prominent positions around the village.

### *Obtaining responses*

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- 3.40 There were 106 responses received from the local community. Ashwell has approximately 1,500 residents over the age of 16, so it represents 7% of the total. The figure is broadly comparable with the previous consultation that produced 113 replies and is considered reasonable bearing in mind that residents' comments to the organisers suggested a degree of 'consultation fatigue' was setting in.
- 3.41 Note that the sum of the responses to some policies does not add up to 106. This is because some respondents left the choice of 'Yes, in agreement', 'No' or 'No opinion' completely blank. These cases could be interpreted as 'No opinion'.
- 3.42 By 30 September 2020 the results from electronic and hard copies were merged into a master document, including the free text comments, with all data anonymised. This is contained in Appendix D.

### *Statutory consultee responses*

- 3.43 To arrive at the list of consultees, the Working Group started with the list from the previous consultation but amended it to take into account the views of consultees who did not feel the need to be approached. The final list is in Appendix E. Nine organisations replied with comments:
- NHDC
  - Hertfordshire County Council
  - Anglian Water
  - The Environment Agency
  - Historic England
  - Hertfordshire and Middlesex Wildlife Trust
  - Highways England
  - Sport England
- Natural England and Guilden Morden Parish Council replied but made no specific comments about the Plan.
- 3.44 In addition, the headquarters of the owners of the Local Green Space (Foresters Friendly Society) was expressly written to, to inform them of the proposal regarding their land. Previous contact had been made with local members of the Society who had not raised concerns but then Society sent a formal response objecting.

## October to November 2020: preparing the Submission Version (Regulation 16) Neighbourhood Plan

### *Analysis of the second Regulation 14 consultation*

- 3.45 From October to November 2020 a small team, including the consultant, reviewed the merged comments received from the Pre-Submission Consultation, drafted responses and suggested changes to the Neighbourhood Plan. The full Working Group reviewed the Plan and supporting documents to produce the final versions of the documentation required for Regulation 16 submission.

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A consolidated report of the comments received and responses finalised by the Working Group are set out in Appendix F1 (Ashwell Village) and F2 (Statutory consultees).

### *Responses from Ashwell Village:*

- 3.46 Responses from the village consultation were overwhelmingly in support of the policies. Policies ASH13, Incubator/ start-up flexible business space, and ASH16, Provision of leisure and recreation facilities, had the lowest level of support but still received 91 and 92 responses in favour, which is 86% and 87% respectively.
- 3.47 Concerns were consistent with those expressed in the previous consultation and the surveys, such as:
- The level of development already experienced is putting the considerable historic and landscape assets of the village under unacceptable pressure and future development needs to be strictly managed to protect them,
  - While some facilities are under excessive pressure (school, doctors surgery), others such as the three pubs are having difficulty and need protection,
  - Traffic and parking are problems that are getting worse.
- 3.48 Not all of the issues raised by those responding can be addressed by a Neighbourhood Plan, for example: damage caused by visitors to the Springs or light pollution from security lighting. Where possible non-policy actions provide a response to these concerns.

### *Statutory consultees*

- 3.49 Most of the feedback from statutory consultees was supportive and they welcomed the policies.
- 3.50 Suggestions for change broadly fell into one of two categories:
- sub-policies that should be classified as follow-on actions for the Parish Council, NHDC, Hertfordshire County Council and other bodies,
  - helpful revisions that could be incorporated in the Plan without compromising its aims or requiring a major re-think.

### *Finalising the documentation for submission according to Regulation 16*

- 3.51 Following the changes made to the Plan as a result of the Regulation 14 consultation, the Working Group will make a submission to North Herts District Council according to Regulation 16.
- 3.52 The submission comprises the following documents:
- Ashwell Neighbourhood Plan, Regulation 16 submission version including appendices
  - Regulation 16 Consultation statement including appendices
  - other

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- 3.53 Assuming the submission pack is acceptable, it will proceed to the Examination stage and then to a referendum.

## 4 Strategic Environmental Assessment and Habitats Regulation Assessment

### Strategic Environmental Assessment

- 4.1 The Plan and the process under which it was made conforms to the SEA Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 4.2 North Herts District Council (NHDC) is the lead authority for Ashwell's Neighbourhood Plan. An initial screening based on the original (August 2018) version of the Neighbourhood Plan was undertaken and it was determined that an SEA would be required because of the potential impact that the site allocations might have, particularly on the historical environment.
- 4.3 The Plan was revised considerably following the first Regulation 14 consultation and this led to NHDC writing back to the statutory consultees to understand if the revised content would change their advice in respect of the need for an SEA.
- 4.4 Responses were received from all three organisations and it was determined that the policies contained in the Neighbourhood Plan would be unlikely to have significant impacts on the environment, therefore an SEA was not required.
- 4.5 Nevertheless, the Working Group prepared a Sustainability Statement to accompany the Pre-Submission Version Neighbourhood Plan for the second Regulation 14 consultation. This considered the potential impacts of each of the policies on sustainability and this has been amended, where necessary, to reflect comments received in readiness for submission alongside the Submission Version Neighbourhood Plan.

### Habitats Regulations Assessment (HRA)

- 4.6 Under Directive 92/43/EEC, also known as the Habitats Directive<sup>1</sup>, it must be ascertained whether the draft Plan is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulation Assessments ("HRA"). An appropriate assessment ("AA") is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.
- 4.7 A screening opinion in respect of Habitats Regulations Assessment (HRA) was prepared, which was subject to consultation with relevant stakeholders including Natural England. Their response concluded that "*the Neighbourhood Plan is not likely to result in significant effects on any European site*".

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<sup>1</sup> Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>.

## Ashwell Neighbourhood Plan Consultation Statement

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- 4.8 In addition to conforming to its EU obligations, the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights.
- 4.9 The original Determination Statement (dated 19 July 2019) and the updated SEA advice (dated 20 June 2020) are contained in Appendix G.

## 5 Conclusion

- 5.1 The Working Group has undertaken a very thorough engagement programme in order to develop its Plan. It has set out a comprehensive vision and objectives. In developing the policies to achieve that vision and those objectives, it has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 5.2 Feedback from NHDC and from Regulation 14 consultations generally has enabled the Plan to be shaped into its final version, ready for submission. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 5.3 Finally, the Parish Council would like to thank everybody who has contributed to the Plan's development, either as a valued member of the Working Group or one of its sub-groups, as well as those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Plan.

# Ashwell Neighbourhood Plan Consultation Statement

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## Appendix A Surveys, results and comments

### A1 Ashwell Housing Survey 2015

Scope: population structure and housing needs, see attached files as follows:

A copy of the questionnaire sent to all households in the parish	ANP_Housing_Survey_2015_Questionnaire_Reg16_Submission_2020.pdf
Questionnaire responses data with graphs	ANP_Housing_Survey_2015_Data_Reg16_Submission_2020.xls
Free text responses	ANP_Housing_Survey_2015_FreeText_Reg16_Submission_2020.pdf
Presentation of results and key messages	ANP_Housing_Survey_2015_Results_Reg16_Submission_2020.pdf

### A2 Ashwell Business Survey 2016

See attached files as follows:

A copy of the questionnaire sent to businesses in the parish (excluding farms and smallholdings)	ANP_Business_Survey_2016_Questionnaire_Reg16_Submission_2020.pdf
Questionnaire responses summary	ANP_Business_Survey_2016_Results_Reg16_Submission_2020.pdf

### A3 Ashwell Second Survey 2017

Scope: current usage and future need for village services covering:

- retail outlets
- education
- health
- the environment
- leisure and recreation
- parking and transport
- other utilities.

See attached files as follows:

A copy of the questionnaire sent to all households in the parish	ANP_General_Survey_2017_Questionnaire_Reg16_Submission_2020.pdf
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## Ashwell Neighbourhood Plan Consultation Statement

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Questionnaire responses summary with graphs	ANP_General_Survey_2017_Data_Reg16_Submission_2020.xlsx
Free text responses	ANP_General_Survey_2017_FreeText_Reg16_Submission_2020.pdf
Presentation of results and key messages	ANP_General_Survey_2017_Results_Reg16_Submission_2020.pdf

# Ashwell Neighbourhood Plan Consultation Statement

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## Appendix B First Reg.14 consultation:

### Parish consultation

The documents can be seen in the following files (attached).. They show the questions asked of local parishioners and businesses, and the comments obtained..

Consultation questionnaire	ANP_Consultation_2018_Questionnaire_Reg 16_Submission_2020.pdf
Anonymised table of all public consultation including businesses	ANP_Consultation_2018_Comments_Reg16_Submission_2020.xlsx

### List of statutory consultees and full comments received

The following organisation were invited to comment:

Organisation	Organisation	Organisation	Organisation
Affinity Water Ltd	Environment Bank	Milton Keynes Borough Council	Royal Society for the Protection of Birds
Anglian Water Asset Management	Equality and Human Rights Commission	Mono Consultants	RWENPOWER Plc
Anglian Water Services Ltd	Forestry Commission	National Express East Coast, Main Headquarters	Sport England - East Region
Arriva the Shires & Essex	Freight Transport Association - Head Office & London & South East Region	National Grid	Stevenage Borough Council
BAA Stansted - Corporate Office	Health and Safety Executive (HSE)	Natural England - East of England Region	Sustainable Places, Environment Agency
BCDTA Contacts - Main Contact Point	Hertfordshire Constabulary	Network Rail	Telefonica O2 UK Limited
Bedfordshire & River Ivel IDB	Hertfordshire County Council	NHS Cambridgeshire and Peterborough Clinical Commissioning Group	Thames Water Utilities Ltd
British Geological Survey, KEYWORTH (Headquarters)	Hertfordshire Fire and Rescue Service	NHS East and North Hertfordshire CCG	The Church Commissioners
British Telecommunications PLC	Hertfordshire Gardens Trust	NHS England	The Coal Authority

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Organisation	Organisation	Organisation	Organisation
CABE - Commission for Architecture and the Built Environment	Hertfordshire Local Enterprise Partnership	NHS Luton Clinical Commissioning Group	The Diocesan Board of Finance
Cambridge City Council	Hertfordshire Partnership NHS Trust	NHS Property Services Ltd	The Highways Authority
Centrica PLC - British Gas	Herts & Middlesex Wildlife Trust	North Hertfordshire District Council	The Woodland Trust
Civil Aviation Authority	Highways Agency	North Herts & Stevenage Green Party	Three
Defence Estates	Highways England	Police and Crime Commissioner for Bedfordshire	Transco
Department of Constitutional Affairs	Historic England	Police and Crime Commissioner for Cambridgeshire	UK Power Networks
Department of Environment, Farming and Rural Affairs (DEFRA)	Homes and Communities Agency	Police and Crime Commissioner for Essex	Veolia Water Central Ltd
Disability Rights Commission	Huntingdonshire District Council	Police and Crime Commissioner for Hertfordshire	Virgin Media
East & North Hertfordshire NHS Trust	Hutchinson 3G (UK) Ltd	Powergen	Vodafone and O2
East of England Ambulance Service NHS Trust	Letchworth Garden City Heritage Foundation	Primary Care Group	
EDF Energy	Letchworth Police Station	Rail Freight Group	
EE	London Luton Airport Operations Ltd	Road Haulage Association - Southern & Eastern Region	
Environment Agency	London Stansted Airport	Royal Mail - Property Holdings	

The following organisations provided a response:

# Ashwell Neighbourhood Plan Consultation Statement

Consultee	Response															
The Forestry Commission	Thank you for consulting the Forestry Commission, unfortunately we do not have the resources to respond to Neighbourhood plans															
Hertfordshire Constabulary	<p><b>HDP3 – Design standards:</b> Whilst assessment of the design merits of new developments under the existing Local Plan will not be limited to the following, applications for development will be required to meet all of the following criteria unless they include a clear justification for not meeting the standard on the basis of specific circumstances or viability:</p> <ul style="list-style-type: none"> <li>■ Meet the guidelines on internal space set out in good practice guidance prepared by the Royal Institute of British Architects (RIBA) in its 2011 publication 'The Case for Space: The Size of England's New Homes<sup>12</sup>, or any guidance which explicitly supersedes it.</li> <li>■ Achieve a 'green' for criteria 12 of the Building for Life 12 code that deals with external storage and amenity space.</li> <li>■ Achieve Part 2 Secured by Design accreditation as a minimum, and ideally should achieve full SBD accreditation. Features such as gated developments, that invoke a fear of crime, are to be avoided.</li> <li>■ Street lighting should achieve the standard as described in the Secured by Design publication 'Lighting Against Crime' or subsequent documents which explicitly supersede this.</li> <li>■ Meet the Government target for new buildings to be carbon neutral, ideally ahead of the proposed date (currently 2016).</li> </ul> <p><b>TP8 – Residential Parking:</b> Proposals for new developments will have adequate off-street car and cycle parking provision to meet current and reasonably assessed future needs. Developers will normally be expected to provide parking equal to the level set out as a maximum in the Local Plan 2007. These are as follows:</p> <table border="1" data-bbox="619 1272 1054 1509"> <thead> <tr> <th>Bedrooms</th> <th>Zone 227</th> <th>Elsewhere</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0.75</td> <td>1.25</td> </tr> <tr> <td>2</td> <td>1</td> <td>1.5</td> </tr> <tr> <td>3</td> <td>1.5</td> <td>2.25</td> </tr> <tr> <td>4</td> <td>2</td> <td>3</td> </tr> </tbody> </table> <p>Where the level of provision deviates materially from these numbers developers will be required to justify the level of parking provision in relation to:</p> <ul style="list-style-type: none"> <li>■ Local car ownership levels</li> <li>■ The type, mix and use of the development</li> <li>■ The accessibility of public transport to a range of destinations which users can reasonably be expected to visit</li> </ul> <p>Garages may be counted as parking spaces provided they have a minimum clear internal dimension of 3m*6m.</p> <p>Off street parking which is contiguous with, and part of, each numbered property is strongly preferred. Parking courts may be permitted provided that they</p>	Bedrooms	Zone 227	Elsewhere	1	0.75	1.25	2	1	1.5	3	1.5	2.25	4	2	3
Bedrooms	Zone 227	Elsewhere														
1	0.75	1.25														
2	1	1.5														
3	1.5	2.25														
4	2	3														

# Ashwell Neighbourhood Plan Consultation Statement

Consultee	Response
	<ul style="list-style-type: none"> <li>■ are built to Secured by Design standards or equivalent and adequately lit</li> <li>■ serve a small number of properties, for example no more than five<sup>28</sup>, except in the case of flats where a single block or two closely adjacent blocks may be served.</li> <li>■ are overlooked by surrounding dwellings</li> <li>■ are clearly visible and easily accessible from the property served</li> <li>■ are aesthetically pleasing and complement the street scene both when full and partially empty</li> <li>■ have a sense of place and are designed to encourage ownership</li> <li>■ have regard to any design guide published in association with this plan.</li> </ul> <p>The road layout at the approaches to parking courts must be designed so that residents will be encouraged to use them in preference to parking on the street. This will normally be achieved by ensuring that</p> <ul style="list-style-type: none"> <li>■ the entrance to parking courts precedes the dwelling when approached from the distributor road or other access serving the development</li> <li>■ the distance to be travelled from the distributor or access road to the parking space is comparable with or less than the distance to the 'on street' parking opportunity nearest to the property</li> <li>■ access to the parking court is easy to negotiate and that parking spaces are sufficiently wide that they are easy to use</li> </ul> <p>The walking distance between the vehicle and the dwelling to which it belongs (or to the relevant entrance to the block in the case of flats) must normally be no more than 20m<sup>29</sup> via a paved route.</p> <p>A reasonable level of car and cycle parking must also be provided for visitors to residential developments. Developers will normally be expected to provide 0.5 visitor car spaces per dwelling in addition to the above unless they can show that the demand is likely to be materially different.</p> <p><b>Crime prevention:</b> please add a section that ' All developments are to achieve the Police preferred minimum security standard that is Secured by Design. This is proven to reduce the risk of dwelling burglary by over 60%. (There is a precedent for this see Bishops Stortford Neighbourhood Plan for Silverleys ward and the Local Plan for East Herts. Both have been adopted and been through the Planning Inspectorate.)</p> <p><b>Crime and Security:</b> developments should be designed to reduce the opportunity for crime by encouraging the natural surveillance of streets, footpaths, parking and communal areas, and the creation of areas of defensible space. Such measures should not significantly compromise the provision of high quality design and landscape schemes nor be prejudicial to the existing character of the area and public amenity.</p> <p>Security features should be designed in a sensitive manner which respects the overall character of the frontage and location whilst maintaining an attractive street scene and minimising light pollution.</p>

## Ashwell Neighbourhood Plan Consultation Statement

Consultee	Response
Hertfordshire County Council	See attached .pdf file
Hertfordshire Gardens Trust	The only comments I have on this are on the Historic Environment (7.2 page 40). There is a bias here towards the earlier periods, which is where the wealth of your heritage assets come from. However, I am very disappointed that you have not included historic parks and gardens in your list of designated heritage assets as you have the Jekyll Ashwell Bury which is on the HE Register. You will also have a range of other historic gardens which are of local interest which you should add to the heritage assets mentioned in policy 7.h. In other NP where I have been involved crucial views/settings of the heritage assets have also been considered to help identify those which need to be protected when future development looms
Highways England	The following proposal is unlikely to have a severe impact on the strategic road network. We therefore offer no comments in this case
Historic England	See attached .pdf file
North Hertfordshire District Council	See attached .pdf file
Sport England	<p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p><a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p>

# Ashwell Neighbourhood Plan Consultation Statement

Consultee	Response
	<p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p>

## Ashwell Neighbourhood Plan Consultation Statement

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Consultee	Response
Thames Water	<b>By telephone:</b> Thames Water received the Ashwell NP consultation but it is not something it would be involved with. It has never been approached by anyone before with this sort of request.

# Ashwell Neighbourhood Plan Consultation Statement

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## Appendix C Second Reg.14 consultation

### Parish consultation

The documents can be seen in the following files (attached as separate documents). They show the questions asked of local parishioners and businesses, the comments obtained and the Working Group's responses.

Consultation questionnaire	ANP_Consultation_2020_Questionnaire_2020_Reg16_Submission_2020.pdf
Anonymised table of all public consultation including businesses, with responses and proposed edits to the Neighbourhood Plan (where required)	ANP_Consultation_2020_CommentsResponses_Reg16_Submission_2020.pdf

### List of statutory consultees, full comments received and Working Group responses

The following organisations were invited to comment:

Organisation	Organisation	Organisation	Organisation
Affinity Water Ltd	Eyeworth Parish Council	Homes and Communities Agency	Sport England
Anglian Water	Guilden Morden Parish Council	Marine Management Organisation	UK Power Networks
Bygrave Parish Council	Hertfordshire County Council	Natural England	Vodafone and O2
Caldecote and Newnham Parish Council	Herts and Middlesex Wildlife Trust	Network Rail	Woodland Trust
Cambridgeshire County Council	Herts and Middlesex Wildlife Trust	NHS Property Services	Croudace Homes (developer)
Central Bedfordshire Council	Herts Local Access Forum	North Hertfordshire District Council	Gladmans (agent)
Coal Authority	Highways Agency	Owner of Forrester's Allotments	JWPC (agent)
Dunton Parish Council	Highways England	Rushden and Wallington Parish Council	Tingdene Parks Ltd (developer)
East and North Hertfordshire Clinical Commissioning Group	Hinxworth Parish Council	Sandon Parish Council	Foresters Friendly Society (re: Local Green Space)

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Organisation	Organisation	Organisation	Organisation
Environment Agency	Historic England	South Cambridgeshire District Council	

The following organisations provided a response.

Consultee	Response
Anglian Water	<p>Policy ASH1: Location of development:</p> <p>The policy as drafted includes a requirement for utilities development including that proposed by Anglian Water to demonstrate that alternative sites have been considered as part of a site selection process. It is unclear on what basis Anglian Water would be required to demonstrate the consideration of alternative sites particularly as there is existing wastewater infrastructure located outside of the settlement boundary.</p> <p>We therefore consider the Neighbourhood Plan should be amended to state that the principle of development which is proposed by Anglian Water as an infrastructure provider within the designated countryside is supported subject to other development plan policies.</p> <p>It is therefore proposed that the final sentence of Policy ASH1 be amended as follows: '(iii). it relates to necessary utilities infrastructure [and where no reasonable alternative location is available.]'</p> <p>Policy ASH5: Flood Risk:</p> <p>Reference is made to the use of sustainable surface drainage systems (SuDS) for all development proposals.</p> <p>Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS). The use of SuDS would help to reduce the risk of surface water and sewer flooding and which have wider benefits e.g. water quality enhancement.</p> <p>The policy includes reference to SuDS standards from 2011. The national non-statutory standards for Sustainable Drainage Systems were published by Defra in March 2015 and are currently under review. It is therefore suggested that the wording of Policy ASH5 should update to refer to the 2015 standards.</p> <p>Anglian Water will only accept a surface water connection to the public sewerage network as last resort where it has been demonstrated that it is not technically feasible to discharge surface water by another option.</p> <p>Therefore we would suggest that final sentence of para A be revised as follows:</p> <p style="padding-left: 40px;">'Only where it is demonstrably unviable unfeasible will an absence of any on-site SuDS provision be permissible in such developments.</p> <p>Reference is made to non-SuDs solution performing as well as SuDS in relation to peak volume and flow.</p> <p>We would expect proposals to be consistent with the requirement of our Surface Water Policy (please see link below). Therefore we would suggest that the policy would require the peak volume and flow to be agreed with Anglian Water.</p> <p><a href="https://www.anglianwater.co.uk/developers/development-services/surface-water-policy/">https://www.anglianwater.co.uk/developers/development-services/surface-water-policy/</a></p> <p>Policy ASH11: Green Infrastructure and Biodiversity:</p>

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Consultee	Response
	<p>It appears that Ashwell Water Recycling Centre (formerly wastewater treatment works) which is managed by Anglian Water forms part of the designated area of green infrastructure.</p> <p>This is essential water recycling infrastructure which is used continuously to serve our customers within the Washbrook catchment which includes Ashwell, Ashwell End and Hinxworth. Reference is made to a number of existing green infrastructure assets but not the Ashwell Water Recycling Centre site or the reasons why it forms part of the green infrastructure network within the Parish.</p> <p>As such we would recommend that Ashwell Water Recycling Centre should be excluded from the designated green infrastructure area.</p>
Environment Agency	See attached .pdf file: ANP_Statutory_2020_CommentsEnvironmentAgency_Reg16_Submission_2020.pdf
Guilden Mordent Parish Council	<p>Thank you for your email of 3 July, which was considered by Guilden Mordent Parish Council at its meeting this week.</p> <p>The Parish Council made no comments.</p>
Hertfordshire County Council	See attached e-mail response: ANP_Statutory_2020_CommentsHCC_Reg16_Submission_2020.msg
Herts and Middlesex Wildlife Trust	<p>Thank you for consulting HMWT on this application. In my opinion the plan needs a chapter on biodiversity net gain which needs to be stated explicitly. The clearer you can make these policies, the better results you will get. We have a template section which has been used by lots of Parishes in Herts that you might want to adopt for your plan which I have attached.</p> <p>The most important element of this is the use of the DEFRA biodiversity metric on all applications bigger than householder. This will enable real, measurable net biodiversity gain as required by NPPF. If you don't include this element, ecological consultants will claim spurious, subjective and false net gain for all their applications, as they do routinely at the moment.</p>
Highways England	<p>Highways England is responsible for managing the strategic road network. In the vicinity of Ashwell, this is the A1 and the nearest points of contact are Junction 10 near to Baldock and the junction near to Edworth. Given the distance from Ashwell, it is unlikely that there is a direct impact from the proposed draft policies on the operation of our network.</p> <p>I note in your plan that you have concerns with congestion in your community, which is exasperated by the type of housing stock which encourages people to drive. I also note the imbalance in housing type and although you have a small housing need allocation, you are trying to adjust that balance. I hope that will encourage take up of more sustainable modes of transport and reduce the pressures on the highway which would be of benefit to all road users.</p>
Historic England	Policy ASH1: Delete policy. While we recognise that this Policy provides some useful context for planning decisions within the ANP area, it does not add anything to existing Local or National Planning Policy, but simply repeats/paraphrases it. Its inclusion in the ANP is therefore unnecessary, and it should be deleted. If you feel that this commentary is important for context, then it could be retained in the form of supporting text within the ANP.

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Consultee	Response
	<p>POLICY ASH3: While we support the inclusion of a heritage criterion 'c', we request the that the wording is amended as follows to ensure consistency with National Policy: C) Development proposals affecting designated and non-designated heritage assets (either directly or via a change in their settings), will be expected to respect, conserve and enhance their significance.</p> <p>POLICY ASH4: We support Policy ASH4, but request criterion 'a' is amended to include reference to the historic environment. We suggest the following amendment: A) Development is expected to demonstrate a high quality of design, which responds and integrates well with its surroundings, and meets the changing needs of residents. It should also minimise its impact on the local natural and historic environment, respecting the topography and the issues that it may create with, for example: access and open views.</p> <p>POLICY ASH8: While we welcome the inclusion of a specific policy on the historic environment, as with Policy ASH1 there is repetition of Local and National Planning policy, particularly with respect designated heritage assets, which is unnecessary.</p> <p>We recommended deleting these references, and focussing on the buildings or structures of character identified in APPENDIX c of the ANP. We suggest the following amendments to Policy ASH8:</p> <ul style="list-style-type: none"> <li>■ New development should seek to avoid harm to the heritage assets (designated and non-designated) within the ANP area.</li> <li>■ Development proposals that conserve or enhance the historic environment will be supported.</li> <li>■ Proposals that could affect the significance of the buildings or structures of character as set out in APPENDIX c of the ANP will be supported if they preserve, sustain and enhance the special character, significance, appearance and locally distinctive features of the asset/s affected, particularly in terms of scale, form, proportion, design, materials and the retention of features.</li> <li>■ Planning permission will not normally be granted for development that would result in the loss of these assets, and will only be supported where it can be demonstrated that the benefits of the scheme outweigh the scale of any harm or loss, having regard to their significance</li> </ul>
Natural England	<p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>
North Hertfordshire District Council	<p>See attached .pdf file: ANP_Statutory_2020_CommentsNHDC_Reg16_Submission_2020.pdf</p>
Sport England	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport,</p>

## Ashwell Neighbourhood Plan Consultation Statement

Consultee	Response
	<p>protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or</p>

## Ashwell Neighbourhood Plan Consultation Statement

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Consultee	Response
	<p>neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p>

The Working Group's responses to the statutory consultees' comments can be seen in the following file (attached as a separate document).

Table of summarised comments from statutory consultees with responses and proposed edits to the Neighbourhood Plan (where required)

ANP\_Statutory\_2020\_CommentsResponses\_Reg16\_Submission\_2020.pdf

Appendix D Copy of NHDC SEA Screening

**NORTH HERTFORDSHIRE DISTRICT COUNCIL**

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Ashwell Parish Council

Our Ref: LP18/Ashwell

By email only

Contact Officer: Clare Skeels  
Direct Line: 01462 474424  
Email: [clare.skeels@north-herts.gov.uk](mailto:clare.skeels@north-herts.gov.uk)  
Date: 22 June 2020

Dear Mr Lee

**SEA Screening Determination for the Ashwell Neighbourhood Plan – Pre-Submission (Regulation 14) Consultation Draft – June 2020**

Thank you for sending the Ashwell Neighbourhood Plan Pre-Submission (Regulation 14) Consultation Draft Sustainability Statement for consideration. The Statement outlines how the objectives of the neighbourhood plan and the draft policies will contribute towards sustainable development taking place in the Parish. The assessment of the draft policies suggests that none of the policies will have a negative effect when assessed against the NHDC Sustainability Appraisal Objectives. It is concluded that at this time the Ashwell Neighbourhood Plan is not likely to have significant environmental effects and therefore a SEA is not required. The principal reasons for this conclusion are that:

- No sites are allocated for development in the neighbourhood plan;
- The Plan focuses on the trying to encourage the right mix of new residential development with a particular emphasis on the design of new development to ensure that the historic character of the Parish is maintained; and
- While the neighbourhood area does contain sensitive features, particularly designated heritage assets, there are no proposals in the neighbourhood plan which are likely to have significant environmental effects on them. In fact, as already noted, key plan policies are designed to provide additional protection for these features.

This screening determination will be reviewed when the Regulation 16 version of the Ashwell Neighbourhood Plan is prepared.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Clare Skeels', is positioned above the printed name.

Clare Skeels  
Senior Planning Officer

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David Squires  
Chief Executive

[www.north-herts.gov.uk](http://www.north-herts.gov.uk)

