

Appendix B : Knebworth Neighbourhood Plan – Schedule of proposed modifications to the neighbourhood plan policies and supporting text

Unless there is a specific comment made against the examiners' recommendations, the District Council is in agreement with the examiners' proposed modifications to the Knebworth Neighbourhood Plan.

Policy, paragraph or page reference	Examiners Proposed Modifications	The Council's comments
Page 9	Change third para to "...2021 National Planning...(NPPF, July 2021)	
Page 9	Delete fourth para ("In...lives.")	
Page 9	Change fifth para to "The NPPF supports the involvement of local..."	
Page 10	Delete second full para and replace with "The emerging North Hertfordshire District Council Local Plan (referred to as "the emerging NHDCLP" in this Neighbourhood Plan) had reached an advanced stage by the time of the examination of the Neighbourhood Plan. The emerging NHDCLP and its evidence base have provided important background information for the Neighbourhood Plan."	
Page 10	Change third full para to "In the emerging NHDCLP..."	
Page 10	Change end of fourth full para to "...by the emerging NHDCLP and additionally, through the Neighbourhood Plan." (delete rest of sentence)	
Page 10	Delete fifth, sixth and seventh full paras ("If the proposed...emerging NHDCLP.")	
Para 1.4	Line one, change to "...established and this was chaired..."	
Para 1.5	Change to "...parish in the emerging NHDCLP..."	

Para 1.6	Change to "...from the emerging NHDCLP..."	
Para 1.7	Third and fourth para, change to "...chapter on design guidance, included as Appendix K to the Neighbourhood Plan. Other parts of...or access proposals but are intended as helpful guidance." (delete rest of fourth para)	
Para 3.4	Change title to "Policies and Policies Maps." Change first line to "...the emerging NHDCLP..." and change fifth line to "The Policies Maps on pages XX and XX should be read..." (NB, page numbers will be determined as the recommended changes are made)	
Policy KBDS1	Change the title of Policy KBDS1 to "Knebworth Village Character"	
Policy KBDS1	Replace the text of Policy KBDS1 with "Development should respect or enhance the special character of Knebworth village."	
Para 4.1	Delete "The following objective relates...nearby towns and villages"	
Para 4.2	Delete all supporting text and delete Figure 9	
Policy KBDS2	Delete first sentence (The...vary."), penultimate and last sentences Reference...supported.")	
Para 4.3	Change first line to "The emerging NHDCLP..."	
Para 4.3	Change second para to "In order to guide development...for development sites allocated in emerging NHDCLP Policies KB1, KB2 and KB4."	
Policy KBLE1	Change policy text to "Proposals for new or expanded commercial space outside the Green Belt will be supported subject to such development respecting local character, residential amenity and highway safety."	
Para 5.2	Change ref at end of first para to "...proposed in the emerging NHDCLP." and change ref on last line of next para to "consistent with emerging NHDCLP Policy..."	In the Council's Regulation 16 response, it was raised that the end of the first

		paragraph seems to trail off, which is now rectified by this proposed change.
Policy KBLE2	Change heading to “5.3 Policy KBLE2 Rural Businesses”	
Policy KBLE2	Change to “...tourism uses will be supported where they are well designed and proportionate to existing buildings, and respect local character, residential amenity and highway safety.”	
Para 5.3	Change reference to “(emerging NHDCLP...”	
Para 5.3	Fourth para change to “The emerging NHDCLP...”	
Para 5.3	Last para, change to “...with emerging NHDCLP..,”	
Policy KBLE3	Change title and subsequent title in Green Box to “Policy KBLE3 Retail Area and Existing Businesses.”	The Council made representations to this policy at the Regulation 16 consultation stage suggesting that defining what was meant by Village Centre would be beneficial. This has now been taken into account by the Examiner by reference to the Retail Area instead.
Policy KBLE3	Delete first para and replace with “In the Retail Area, development requiring planning permission should retain retail or service uses. Also in the Retail Area, existing premises with ground floor access should retain an active retail frontage and new buildings should create new active retail frontage.”	The Council made representations to this policy at the Regulation 16 consultation stage suggesting that defining what was meant by Village Centre would be beneficial. This has now been taken into account by the Examiner by reference to the Retail Area instead.
Policy KBLE3	Delete second para and replace with “Redevelopment in the Retail Area along London Road should retain the characteristically wide footway.”	The Council made representations to this policy at the Regulation 16 consultation stage suggesting that defining what was

		meant by Village Centre would be beneficial. This has now been taken into account by the Examiner by reference to the Retail Area instead.
Policy KBLE3	Delete third and fourth paras and replace with “The change of use of commercial land, including at 1 Stockens Green, 1 Stevenage Road, The Station and The Lytton Arms pubs, the radio station Old Knebworth Lane, and 2 Station Approach, will not be supported unless it can be demonstrated, further to at least 12 months active and open marketing, that the uses are no longer viable.”	
Para 5.4	Change references in supporting text from village centre to “Retail Area” and change second para to “...Centres (emerging NHDCLP) survey...”	The Council made representations to this policy at the Regulation 16 consultation stage suggesting that defining what was meant by Village Centre would be beneficial. This has now been taken into account by the Examiner by reference to the Retail Area instead.
Policy KBLE4	Delete “encouraged and”	
Para 5.5	Change first line to “The emerging NHDC...” and change line three to “...also minimise the need...”	
Para 5.5	Change second para to “...suitable employment (emerging NHDCLP).”	
Policy KBLE5	Change to “...supported, subject to development respecting residential amenity, local character and highway safety.”	
Policy KBLE6	Change to “In respect of major development, developers will be expected to...business use. This may include...”	

Policy KBBE1	Change to "...Neighbourhood Plan area, whilst providing a range of types..."	
Para 6.1	Second para, change to "The emerging NHDCLP..."	
Para 6.2	Change first para to "...Plan area should not be visibly distinguishable from others...Affordable homes should be provided..."	
Para 6.2	Change reference in Para 6.2 from starter homes to "first homes."	The Council made representations to this policy at the Regulation 16 consultation stage and recommended the removal of reference to Starter Homes as this no longer exists. This has been taken into account by the Examiner and replaced with First Homes.
Policy KBBE2	Change wording of Policy KBBE2 to "Construction methods that engage low energy principles, including modular building that respects local character; the utilisation of simple design solutions such as orientation of buildings to optimise solar gain, with the aim of transitioning towards zero carbon energy usage; domestic scale (micro) energy generation from renewable or low carbon sources; and providing for rainwater harvesting and greywater recycling, will be supported."	The Council raised concerns at Regulation 16 stage regarding the introduction of requirements beyond the current and emerging Local Plan requirements which have not been subject to viability testing. This has now been addressed by the Examiner in the proposed amendments to the policy.
Para 6.3	Change to "...in the emerging NHDCLP, Policy KBBE2 seeks to promote sustainable construction techniques and a move towards zero carbon. Further recommendations..."	
Policy KBBE3	Change title to "6.4 Policy KBBE3 Accessibility and Adaptability"	
Policy KBBE3	Change to "Within major developments, the provision of accessible and adaptable homes, providing flexible internal space to allow homes to be adaptable to changing needs without major reconstruction, will be supported."	

Para 6.4	Change first para to "The National Design Guide and the Building for a Healthy Life toolkit provide guidance aimed at enhancing the benefits of new residential development. For example...garden areas can be designed..."	Reference to the National Design Guide and Building for a Healthy Life (now updated from Building for Life) was suggested in the Council's response to the Regulation 16 consultation, and is now incorporated here in the Examiners' recommendations.
Para 6.4	Change last sentence to "Further guidance is contained in the 8 Principles...Architecture Centre."	
Policy KBBE4	Policy KBBE4, delete wording and replace with "All development must demonstrate good design. Development must respect local character, which includes Knebworth's Garden Village context. New housing development should incorporate sensitively designed car parking, bin storage, cycle storage and electric charging for bicycles and motor vehicles."	<p>The Council raised the following points at Regulation 16 stage:</p> <ul style="list-style-type: none"> • Whether the proposed requirements for garages would meet the tests for planning conditions, and in particular in relation to enforceability. • That a range of car parking types is best practice. <p>Amendments to this policy now resolve these issues raised.</p>
Page 33	Delete photos on page 33	
Para 6.5	<p>Change to "Policy KBBE4 seeks to promote good design and is intended to ensure that new development responds to...spaces. In this way, building forms...appearance can be considerate...village.</p> <p>The low-rise...dwellings are expected to continue to be the norm,</p>	

	<p>with new development being sympathetic...areas.</p> <p>Responding...emphasis can be placed..."</p>	
Para 6.5	<p>Delete all supporting text from "Most local authorities appear..." to the end of the supporting text ("...private car ownership.")</p>	<p>The Council raised the following points at Regulation 16 stage:</p> <ul style="list-style-type: none"> • Whether the proposed requirements for garages would meet the tests for planning conditions, and in particular in relation to enforceability. • That a range of car parking types is best practice. <p>Amendments to this policy now resolve these issues raised.</p>
Policy KBBE5	Delete first para ("New...understood.")	
Policy KBBE5	<p>Change rest of Policy to "Major new residential development should be legible, safe, accessible, encourage social interaction and provide a choice of walking and/or cycle routes. Residential parking should be safe and convenient and should not undermine the quality and amenity of streets. Parking should predominantly be on plot, to the side or front in the case of houses, or in parking courts for flats. Underground parking as a solution to minimise land take for car parking will be supported. Vehicle barriers, gated housing developments and narrow footpaths between high sided walls or fences should be avoided."</p>	<p>The Council raised at Regulation 16 stage that good practice is to provide a variety of parking typologies to sensitively integrate cars into the street, block and plot design, rather than the predominate parking being on plot to the side or in front.</p> <p>Whilst the Examiner has deviated from this in stating that parking should predominantly be on plot, to the side or front in the case of houses, or in parking courts for flats, it addresses the wider issue</p>

		of how parking arrangements will be dealt with.
Policy KBBE6	Delete wording and replace with “Development at Deards End (KB1) should: a) be developed at densities that respect local character and Knebworth’s Garden Village context; b) seek to mitigate the effects of A1 (M) noise and air pollution; c) provide a green buffer where the site meets open fields and woodland.”	<p>The Examiner has now deleted parts of the policy which the Council raised issues with at Regulation 16 stage, which include the following:</p> <ul style="list-style-type: none"> • That green infrastructure provision needs to be considered as part of the wider masterplanning process. • That the requirement for outdoor sports facilities needs to be justified in quantitative terms and considered collectively across all emerging allocations. • That the associated car parking for outdoor sports facilities should be provided in line with the Council’s car parking standards.
Policy KBBE6	Delete the three lines of supporting text underneath the Policy	See above
Policy KBBE7	Delete wording and replace with “Development at Gipsy Lane (KB2) should: a) be developed at densities that respect local character and Knebworth’s Garden Village context; b) conserve or enhance the setting of the Stockens Green Conservation Area; c) seek to mitigate the effects of A1 (M) noise and air pollution.”	<p>The Examiner has now deleted parts of the policy which the Council raised issues with at Regulation 16 stage, which include the following:</p> <ul style="list-style-type: none"> • That green infrastructure provision needs to be considered as part of the wider masterplanning process. • That the requirement for outdoor sports facilities needs to be justified

		in quantitative terms and considered collectively across all emerging allocations.
Policy KBBE7	Delete the three lines of supporting text underneath the Policy	See above
Policy KBBE8	Delete wording and replace with “Development on land east of Knebworth (KB4) should: a) be developed at densities that respect local character and Knebworth’s Garden Village context; b) seek to improve pedestrian access and safety along Watton Road and Swangleys Lane; c) provide a green buffer to open fields.”	
Policy KBBE8	Delete the three lines of supporting text underneath the Policy	
Policy KBW1	Delete text and replace with “The development of new or enhanced community facilities and services, including those that increase opportunities for recreation and health and wellbeing, will be supported.”	
Policy KBW2	Policy KBW2, delete first sentence and replace with “The five areas listed below and shown on the Figures following this Policy are protected as areas of Local Green Space. The management of development within areas of Local Green Space will be consistent with that for development within Green Belts as set out in The National Planning Policy Framework. LGS1 Watton...LGS5 Allotments, Watton Road”	
Policies Maps, Local Green Space	Retain the references in the Policies Maps and provide detailed Figures showing the precise boundaries of each designated area of Local Green Space. These could be on individual or shared plans, the only requirement being that the boundary of each Local	

	Green Space is presented so clearly as to be beyond dispute. These Figures should be provided below the wording of Policy KBW2	
Para 7.2.3, page 43	First full para, change to "...in para 102 of the NPPF..."	
Policy KBW3	Delete the first two paragraphs ("Development...demonstrated:") and replace with "The loss of the following Recreation Green Spaces will not be supported unless they are replaced with better facilities at least as accessible to the local community as the current spaces: (list of 5 sites here)."	
Policy KBW3	Change last sentence to "...will not be supported unless..."	
Policy KBW4	Delete text and replace with "In order to maintain an inclusive village community, the valued and potentially vulnerable community facilities listed below should be retained in their current use unless: a) They are no longer needed/there is no demand for them; b) They are replaced by better community facilities in locations accessible to the local community"	
Policy KBW5	Replace the Policy wording with "The provision of new allotments to meet local demand will be supported."	The Council raised concerns regarding the level of provision and its potential effect on the delivery of other forms of open space at Regulation 16 stage. The Examiner has addressed this with the new proposed policy wording.
Policy KBW5	Delete the last sentence of the first paragraph of supporting text below the Policy (If...sites") and replace it with: "The Parish Council will seek the provision of new allotment areas, including within proposed major development sites.	

Policy KBW5	Change the second paragraph of supporting text to: "The Parish Council is keen to find around 1.5 hectares of land for use as allotments. This would be in general accordance with The Allotment Association...providing allotments. The Parish Council will seek to work with developers to identify...allotment provision."	The new proposed wording by the Examiner alleviates the concerns raised by the Council Regulation 16 stage about the level of allotment provision sought, by making the language more of an aim.
Policy KBS1	Delete Policy KBS1, supporting text and photographs	
Policy KBS2	Delete Policy KBS2 and supporting text	The Council suggested at Regulation 16 stage that the first sentence of the policy should be removed that related to the site for a new primary school. This is now resolved given that the Examiner has proposed the whole policy and supporting text to be deleted.
Policy KBS3	Delete Policy KBS3 and supporting text	
Policy KBS4	Delete Policy KBS4 and supporting text	<p>The Council raised concerns the following at Regulation 16 stage, which have now been resolved given the proposed deletions by the Examiner:</p> <ul style="list-style-type: none"> • That the latest proposed modifications to emerging Local Plan Policy SP10 and associated supporting text recognise the challenges around predicting and providing for long-term education needs and that alternate possibilities may be identified in the intervening period. It is considered that this would provide a more

		<p>appropriate basis for the commentary in the Neighbourhood Plan rather than the ‘ins and outs’ of the Local Plan Examination.</p> <ul style="list-style-type: none"> That the policy and supporting text effectively seek to apply Green Belt policy to land that would not be Green Belt if the Local Plan proceeded to adoption and this is not considered appropriate.
Policy KBS4	Taking the recommendations in the Schools Chapter into account, I recommend that the whole of the Schools Chapter is removed from the Neighbourhood Plan and that reference to Objective O elsewhere in the Neighbourhood Plan be deleted	
Policy KBEF1	Change to “Development should minimise impacts on and provide net gains for biodiversity. Major development should: ...to minimise disruption...wooded areas.”	
Policy KBEF1	Change last para of Policy to “...calculator can be taken into account...” and move this paragraph to the start of the supporting text in Para 9.2	
Para 9.2	Delete the first sentence of supporting text (“This...developments”)	
Para 9.2	Change the wording of the fourth, fifth and sixth paragraphs of supporting text under 9.2 to: “It will be important for new developments, wherever possible, to retain existing trees, hedgerows and green road borders to minimise disruption to wildlife. Wherever possible, the removal of mature trees should be justified and access to the sites should be through natural breaks. Removal of hedgerows and verges for access is generally something that should only be considered as a last resort. In addition, it will be important for care to be taken to ensure that tree roots are not damaged as they may extend well past the crown of the tree itself.	

	<p>“The Parish Council is keen that a green infrastructure audit is carried out prior to developments, to help to provide a checklist for... developer-independent equivalent) could be used prior to any...ecological impact.</p> <p>“The Parish Council is keen for landscaping schemes in new developments to encourage healthier ecosystems...aesthetically pleasing.”</p>	
Para 9.2.3	Change second line to “...decades. The Parish Council would like to see these hedgerows retained...” and change second para to “...in the emerging NHDCLP...Old Lane for reservation as part of any new development...”	
Para 9.2.4	Change third para to “...move around and that these connect to new or existing woods. Indeed, it is considered critical that the creation of such corridors takes account of the...”	
Para 9.2.4	Change fourth para to “It is considered important for new wooded areas to be of a size and to contain enough...”	
Policy KBEF2	Delete Policy KBEF2 and supporting text	The Council raised at Regulation 16 stage that existing legislation already covers these matters (apart from c). The proposed deletion by the Examiner rectifies this matter.
Policy KBEF3	Change to “The use of best practice in energy conservation, water conservation and the re-use of building materials with the aim of transitioning towards buildings being carbon neutral in construction and in ongoing use will be supported.”	
Para 9.4,	Delete first para (“This...Knebworth”) and change remaining text to “...However, where this technique is used it is worthwhile being cautious to ensure that the plants used are not so vigorous...New developments can be designed to maximise natural...”	

Policy KBEF4	Change to “Development should not result in a net increase in surface water run-off and should seek to reduce surface water run-off.”	At Regulation 16 stage, the Council recommended that ‘must’ should be replaced with ‘should seek to’ to ensure deliverability. With the new proposed wording, this recommendation is taken forward.
Para 9.5	Delete first five paras (“Although...and fauna”)	
Para 9.5,	Page 66, last para, change to “...flooding. This presents an opportunity to create an overall SuDS scheme that could enhance...”	
Para 9.5	Delete last para (“The...52.”) and replace with “The use of SuDS is likely to comprise an important part of new development in Knebworth and sustainable drainage systems provide a potential solution for managing flood related issues.”	
Policy KBEF5	Change opening sentence to “Development must respect the important views and character areas identified on the Policies Map and listed below:”	
Para 9.6	Delete first two paras (“The location...n.d)”)	
Para 9.6.1	Delete last sentence (“Site...skyline.”)	
Para 9.6.3	Last para, change to “...maintained. The Parish Council is keen to see that this is considered in the...”	
Para 9.6.4	Delete last sentence (“Any...appearance.”)	
Para 9.6.9	Delete last sentence (“Any...view.”)	

Para 9.6.11	Penultimate para, change to "...principles, which provide important opportunities to influence new developments."	
Para 9.7.1	Change start of second para to "NPPF para 189 states "Where..."	
Para 9.7.1	Change end of para to "...field evaluation." The emerging NHDCLP notes that "Should archaeological...asset."	
Policy KBEF6	Delete first para ("Development...asset") and change start of second para to "The following non-designated heritage assets will be conserved in a manner appropriate to their significance: War Memorial...Station Approach; The Cottage, Three Houses Lane; Knebworth Village Hall; 1, 3 & 5 Station Road; 23 Station Road; and 143 London Road."	
Policy KBEF6	Delete last sentence ("This policy...Plan.")	
Policy KBT1	Delete text and replace with "The provision of sustainable modes of transport, electric vehicle charging points and the protection and enhancement of public rights of way will be supported."	
Para 10.2	First para, delete "and North Herts...52)" and delete second para ("If...increase.") and delete second sentence of third para ("It is probable...40).")	
Para 10.2	Fourth para, delete last sentence ("This...51)")	
Policy KBT2	Delete Policy KBT2 and supporting text	The Council raised the following points at Regulation 16 stage:

		<ul style="list-style-type: none"> • That the second paragraph duplicates emerging Local Plan policy for the relevant allocations listed. • That cumulative transport impacts will be considered as part of the masterplanning process for allocations KB1, KB2 and KB4, which will inform appropriate transport access arrangements and mitigation measures. • The requirements for building line distances are not justified by evidence and fall beyond the scope of planning policy. <p>These comments are now resolved given the proposed deletion of the policy and supporting text.</p>
Policy KBT3	Delete Policy KBT3 and supporting text	
Policy KBT4	Delete Policy KBT4 and supporting text	
Policy KBT5	Delete Policy KBT5 and supporting text	
Chapter 11	Delete heading of Chapter 11 and replace with “11 - Implementation”	
Policy KBI1	Delete heading “11.2 Policy KBI1 Spending Priorities”	
Policy KBI1	Remove green box and delete “KBI1 Spending Priorities”	
Policy KBI1	Delete wording of text previously in green box and replace with “The Parish Council is keen to see that funding derived from development in Knebworth benefits the residents of	At Regulation 16 stage, the Council raised the point that limiting funding derived from

	Knebworth. To this end, a list of projects identified in an Action Plan (Appendix E) will be reviewed twice a year by the Parish Council."	development in Knebworth to only benefiting Knebworth residents was not reflective of the need to consider impacts beyond the immediate area. Further to this, this could hamper meeting the tests for planning obligations in the NPPF and Regulation 122.
Page 90	Delete last para and replace with "The Parish Council will seek to encourage developers to take the Action Plan into account when submitting planning applications for development in Knebworth Parish and will seek to work with the County Council and District Council to achieve this."	The Examiner has now proposed wording which retains the aim through the use of 'the Parish Council is keen...' without stating this in a prescriptive way as phrased previously. This therefore alleviates the concerns raised by the Council.
Other	Update the Contents, Policy, Figure, paragraph and page numbering to take into account the recommendations contained in this Report	As set out also above, the Examiner has softened the language in relation to the spending of developer contributions, which now resolves concerns raised by the Council at Regulation 16 stage.

Other proposed non-policy modifications to the neighbourhood plan

Policy or paragraph reference	Examiners Proposed Modifications	The Council's comments

Policies Maps	Move Policies Maps from Appendix A to the body of the plan, following on from the end of the Policy (and Implementation) section of the plan	
------------------	--	--