

North Herts Council Officer Response to the Pre-Submission version of the Ickleford Neighbourhood Plan 2022 – 2035

November 16th, 2022

Page No. & Policy or Paragraph No.	Comments
General comments	We acknowledge that this pre-submission version of the Neighbourhood Plan was at an advanced stage of preparation before the Inspector's report for the Local Plan was received and published. However, as you may be aware, the Council adopted the Local Plan on November 8th, 2022, and the draft Neighbourhood Plan will need to be reviewed to ensure that all of the policies are in conformity with the strategic policies in the Local Plan and that any references to the 1996 Local Plan or the "emerging" Local Plan are updated.
Page 6 Paragraph 2.5	The paragraph states that Ickleford has been identified as a "Growth Village", but this is not a term that is used in the Local Plan. The paragraph should be amended to reflect the wording of the Local Plan.
Page 17 & 18 Paras 7.5 & 7.6 and Policy E1	<p>Paragraphs 7.5 and 7.6 will need to be revised before the submission version of the Neighbourhood Plan to reflect the adoption of the Local Plan.</p> <p>The Local Plan has set the Green Belt and settlement boundaries for the coming years, through Policies SP2 (Settlement Hierarchy and Spatial Distribution) and SP5 (Countryside and Green Belt). Those boundaries will only be reviewed by the Local Plan in accordance with the criteria set out in the NPPF.</p> <p>We consider that Policy E1, of your Neighbourhood Plan, is not in conformity with NPPF or the NHC Local Plan and should be deleted. There are specific circumstances which are detailed in the NPPF and Local Plan Policy SP5 when development can be permitted in the Green Belt.</p>
Page 27	We acknowledge that undesignated heritage assets should be included in your Neighbourhood Plan and that the Icknield Way, the Village Hall

Policy HE1	<p>and the commemorative bus shelter could be described as heritage assets.</p> <p>However, we do not consider that all of the areas of significant green space identified in the Ickleford Conservation Area Statement should be identified in the Neighbourhood Plan as undesignated or local heritage assets. In particular, the private gardens of the individual houses in Chambers Lane and Greenfield Lane which are not listed.</p> <p>Planning Practice Guidance (Paragraph 039 Reference ID: 18a-039-20190723) defines non-designated heritage assets and we do not consider that these areas of green space meet that definition.</p> <p>The Conservation Area Statement (Section 3.2) does include a number of buildings or local features which make a positive contribution to the Ickleford Conservation Area. Should these be included as non-designated heritage assets in this policy?</p>
Page 28 Policy SD1	<p>It is not clear from the policy what types of development would be considered “appropriate” and therefore supported within the settlement boundary, although they are defined in paragraph 9.5. You should amend it to make it clearer</p>
Page 28 Paragraph 9.7	<p>The wording of the paragraph needs to be revised following the adoption of our Local Plan to remove the references to “Category A” villages as Ickleford is no longer described as such in the Local Plan.</p>
Pages 29 - 31 Policy SD2	<p>Our detailed response to this section of the Neighbourhood Plan will follow.</p>
Page 33 Policy SD3	<p>As it is currently worded, the policy will require that modest householder applications for extensions to their property will have to meet all of the criteria listed in the policy. However, some of those criteria would not necessarily be applicable for those types of application. You should consider amending the policy to make it clear about the types of development that would be required to meet the criteria.</p> <p>Policy D2 in the Local Plan is specifically framed to ensure that a high-quality environment is maintained in residential areas whilst allowing flexibility with regard to house extensions, outbuildings or replacement dwellings.</p>
Page 34 Policy SD4	<p>As written, the policy is vague in that proposals should “aim” to meet a high level of design and construction. The policy could be amended to support proposals which provide high levels of energy efficient design and construction, which would be more positively framed</p>
Page 35	<p>The Building Regulations set out the requirements for water efficiency in new dwellings. To ensure that the water consumption does not exceed 110 litres per person per day, there must be a condition attached to the</p>

<p>Para 9.39 & Policy SD5</p>	<p>planning permission for that development. You could amend the policy to strengthen this requirement.</p>
<p>Page 39 Policy C1</p>	<p>The policy feels a little confused; it would be more positively framed if the part of the policy which focuses on the loss of community facilities was moved to being the last paragraph of the policy.</p> <p>The provision of new community facilities should be supported rather than encouraged, which would be a positive statement in the neighbourhood plan.</p> <p>Could the final paragraph be simplified?</p> <p>Outside of the neighbourhood planning process, has the Parish Council considered whether the community facilities listed in the policy should be designated as Assets of Community Value? Separate guidance is available through Locality and the Council's website.</p>
<p>Page 40 Policy C2</p>	<p>The policy lists a number of open spaces and refers to Annexes 8 and 9. Should the play area which is within the boundary of the Recreation Ground be listed as one bullet point?</p> <p>The Alleyfield Burial Ground is not included in Annex 9;</p> <p>Should the allotments bullet point be amended to name the Little Park and Ryder Way allotments?</p> <p>In terms of the footpaths, bridleways and byways, it would be more appropriate to take these out of this policy and treat them in a separate policy in the Movement, Traffic and Transport section which would link in with new provision and design of developments.</p> <p>Should the 2nd sentence of the policy be amended to be positive about what types of development would be appropriate at the named locations?</p> <p>The Parish Council could consider whether the open spaces listed in the policy should be designated as "Open Green Spaces", as described in paragraphs 101 to 103 in the NPPE.</p>
<p>Page 42 Policy C3 – 2nd paragraph</p>	<p>The wording of this part of the Policy should be amended to more accurately reflect the Local Plan. The Local Plan does not specifically identify a site for a new school, instead, our Policy IC3 includes a requirement that approximately 2 hectares of land should be secured as a reserve school site.</p>
<p>Criterion (b)</p>	<p>As worded, this largely mirrors the requirements set out in the Local Plan. However, the Neighbourhood Plan includes an additional requirement for the transport assessment to include "other sites beyond the parish in Stondon and Henlow" for which there is no justification set out in the Neighbourhood Plan. It will be for the Highways Authority to</p>

	<p>determine the scope of a Transport Assessment for the school if it is developed.</p>
<p>Final paragraph</p>	<p>This part of the policy also states that “all the relevant criteria set out in the masterplan and Design Codes should be followed including (but not exclusive to):...”</p> <p>The concern with this part of the policy is that it reads as though the Masterplan prepared by AECOM is the final version for the site and that all of the criteria should be followed. However, AECOM make it clear that the Masterplan prepared as part of the Design Code for the Neighbourhood Plan has been prepared at a high level, is illustrative and that technical studies have not been undertaken.</p> <p>We believe that the policy should be amended to encourage the preparation of a detailed masterplan in consultation with the local community which would then be able to better reflect the circumstances at the time the school proposal comes forward.</p> <p>There are a number of criteria listed here but these replicate the criteria set out in Policy IC3 of the Local Plan. It is not necessary for the Neighbourhood Plan to replicate these.</p> <p>It is also unclear why the criteria refer to the Oughtonhead Lane SSSI, which is some distance from this site.</p>
<p>Page 44 Policy C4</p>	<p>There are areas of duplication between this policy and a number of policies in the Local Plan, which include:</p> <p>Policy SP3: Employment</p> <p>Policy SP5: Countryside and Green Belt</p> <p>Policy ETC2: Employment development outside Employment Areas and Employment Allocations BA10 and RY9</p> <p>Policy CGB1: Rural Areas beyond the Green Belt</p> <p>Policy CGB4: Existing buildings in the Rural Area beyond the Green Belt</p> <p>Policy D3: Protecting living conditions</p> <p>Some consideration should be given to simplifying the policy to focus on the elements which are not included in the Local Plan to ensure that there is no duplication between the plans.</p>
<p>Page 46 Policy MTT1</p>	<p>The policy suggests that any new road junctions should be designed to complement the rural character of the village and reflect local heritage. It should be noted that Hertfordshire Highways is a statutory consultee for all planning applications and there is published guidance which sets out the standards that must be met for roads to be adopted.</p>

North Herts Council Officer Response to the Pre-Submission version of the Ickleford Neighbourhood Plan 2022 – 2035

December 6th, 2022

Size and Mix of Homes and Policy SD2: New Housing Development

We have noted that one of the aims of Policy SD2: New Housing Development is to provide at least 34% smaller and “less expensive” homes in the Parish.

Policies HS2 and HS3 in the new Local Plan set out the requirements for affordable housing and the mix of housing which should be provided across the district. These policies are underpinned by the evidence provided by the Strategic Housing Market Assessment and will be used with any update and any other relevant evidence of housing need. The Council would expect that the mix of house types and sizes on the allocated sites would be provided in accordance with the Strategic Housing Market Assessment (or any update).

However, Policy SD2 seeks to change the overall proportion to provide smaller “less expensive” units in Ickleford. This potentially brings about a policy conflict with the Local Plan and may also result in unintended consequences in the long run, e.g additional dwellings proposed for the allocated sites, additional traffic and demands on services. There are also no guarantees that smaller units are less expensive.

Is the intention of the policy to provide housing options for those people already in the village to downsize, or to keep residents from having to move out of the village? It maybe that the wording of the policy needs to be considered against the policies in the now adopted Local Plan.

A Housing Needs Survey was carried out by Community Development Action (CDA) Herts in 2018, which we consider as being up to date for the purposes of assessing all proposals for housing development in the Parish. The CDA Housing Needs Survey concluded that:

- 47 households were identified as being in housing need of affordable housing, the majority of which needed one and two bedroom homes for rent. Five households needed three bedroom houses and four households needed sheltered accommodation.
- 39 households expressed a desire to buy their home on the open market. Of those 39, 22 respondents completed the questions on affordability, income and deposit levels required to buy locally and only 2 households could afford open market housing.

- Of the remaining 20 households, 15 could only afford rented accommodation and 5 households would be able to afford shared ownership.
- 5 people expressed an interest in shared ownership accommodation but could not afford to enter this type of accommodation.
- Overall 42 households needed social and affordable rented accommodation and 5 households could afford to buy on a shared ownership basis.

The CDA study is undertaken by sending questionnaires to all households in the Parish to ask about housing needs in the future, but it is unclear whether the AECOM study has been undertaken in the same way, or whether the data has been taken from the original neighbourhood plan questionnaire. If it is the latter, the questions asked in the neighbourhood plan questionnaire did not ask about housing need in the future but asked whether it was likely that someone in the household would be living in the village in the next ten years or would consider moving in the village. Whilst the questionnaire asked people about what type of accommodation would be needed, this is a much more open question than is asked in the CDA Survey.

As mentioned, the 2018 CDA Housing Needs Survey did ask participants for their income details and found that most people cannot afford open market housing but can only afford rented accommodation. The AECOM Housing Needs Assessment gives an indicative tenure split for affordable housing in the Parish ([Table 4-7](#)). The Council is concerned that if this split is used when considering development proposals in the Parish, there may still be people who would not be able to afford to live in the affordable housing provided. In which case, those affordable units could be offered to people from outside the Parish. The usual approach is to first offer affordable homes to applicants with a local connection to the parish; then if none, applicants in adjoining parishes, then applicants in any rural parish in North Herts before finally being offered to applicants with a local connection to the district of North Hertfordshire generally.

As the AECOM Housing Needs Survey states, some of the affordable housing products described are unknown and therefore their contribution to providing suitable accommodation is also unknown. Previously affordable home ownership products have been shared ownership. Registered Providers / Housing Associations do not seem to offer the Rent to Buy product and so far, developers seem reluctant to provide First Homes, although this may change if nationally the product gains momentum.

The Council has commissioned a review of the Strategic Housing Market Assessment which will be used in conjunction with the Local Plan to assess development proposals across the district. The report is yet to be finalised, but initial findings indicate that for market properties there is a much higher demand (78%) for 3 and 4+ bedroom homes, a need for a greater proportion (64%) of 3 and 4+ bedroom homes for rent, and for affordable home ownership homes a greater need (80%) of one and two bedroom homes.

Across all tenures this equates to a need for 40% one and two bedroom homes and 60% 3 and 4+ bedroom homes. In any event it would be prudent to have a good mix of dwellings sizes on developments to provide a balance.

If you would like to discuss this policy in more detail with us, we would be happy to set up a meeting before the next version of the neighbourhood plan is submitted to the Council for public consultation.