

## Baldock, Bygrave and Clothall Neighbourhood Plan : Consultation Draft – June 2019

### NHDC Officer Response

In making this response, Officers recognise the significant amount of work that has been undertaken in the preparation of this draft neighbourhood plan for Baldock, Bygrave and Clothall.

Page / Section or Policy reference	NHDC Officer comments
Page 5 1 <sup>st</sup> paragraph	<p>The first paragraph sets out how the County Council intends to phase the proposed developments for Baldock. Whilst this might be the intention of the County Council at the time of writing, circumstances may lead to a change in the way the developments might be phased.</p> <p>Consideration should be given to delete this part of the sentence.</p>
Page 5 3 <sup>rd</sup> paragraph	<p>The second sentence states:</p> <p>“It also requires new link roads to the north and south-east of Baldock to help take traffic away from the centre of the town.”</p> <p>Whilst both Policy SP14: Site BA1 – North of Baldock and Policy BA3 – Land south of Clothall Common require new link roads to be provided as part of a development scheme, these are not necessarily aimed at helping to take traffic away from the town. Officers consider that this statement could be misleading.</p>
Page 8 Policy G1	<p>There is a balance between the provision of additional car parking at the station, managing on-street parking and the need to encourage people to use sustainable modes of transport. The policy and supporting text could be stronger in promoting and encouraging more sustainable modes of transport .</p>
Page 9 1 <sup>st</sup> paragraph	<p>Officers are concerned that the neighbourhood plan states that land allocated in the Local Plan, BE2 : Royston Road could be considered for use as car parking for the railway station. The Local Plan has safeguarded land for employment uses across the District to ensure that the employment needs of the District in the period up to 2031 will be provided for.</p> <p>Whilst the neighbourhood plan states that the loss would be insignificant, the District Council would not want to compromise the use of safeguarded employment land and therefore objects to this statement.</p> <p>In order for the District Council to support this proposal, the Neighbourhood Plan would need to (i) provide evidence to demonstrate that the loss of employment land would not materially impact upon the strategic employment aims of the Plan, (ii) identify an alternate site(s) where an equivalent amount of employment could be re-provided and / or (iii) demonstrate the impacts of providing car parking in this location both in terms of car movements and upon sustainable travel.</p>
Page 12	<p>The first sentence of the policy could be simplified by deleting the examples included in the policy text, as these are already included in the explanatory</p>

Policy G3	text.
Page 15 4 <sup>th</sup> paragraph	The neighbourhood plan could identify buildings of local importance for the parishes of Bygrave and Clothall and include them as an appendix. Where appropriate this could include identification of buildings to be considered as non-designated heritage assets for the purposes of national policy (see Paragraph 197 and Annex 2 of the NPPF)
Page 16 Policy E1 2 <sup>nd</sup> paragraph	<p>The first sentence of this paragraph refers to “...<i>applications for these sites should provide for or contribute towards...</i>”.</p> <p>Is this correct? Is the intention that this policy is only applied to applications for the sites BA1, BA2, BA3, BA4 and BA10?</p> <p>The Policy and supporting text appears to neglect opportunities for improving sustainable transport modes to the parishes of Bygrave and Clothall, and also towards Letchworth.</p>
Page 18 Policy E2	<p>The provisions of this policy appear to contradict the statement earlier in the neighbourhood plan (page 5) which states that the Local Plan does not make suitable provision for open space and recreational facilities as the policy states that publicly accessible open space should be provided in accordance or in excess of NHDC standards.</p> <p>The title of the policy should be amended to include sports and recreation facilities, as these are also included in the policy provisions.</p>
Page 20 4 <sup>th</sup> paragraph	The reference to the Hertfordshire Design Review Service should be deleted.
Page 22 Policy E5	<p>The phrase “pre-application” can be used specifically to describe early confidential discussions between a developer and the local planning authority. Consideration might be given to re-wording the criterion to describe early discussions?</p> <p>It should be noted that the developer will be required to submit a statement of community involvement to demonstrate how the community has been involved in the development of the proposals.</p>
Page 24 Policy E6	The wording of the policy in the draft neighbourhood plan is more restrictive than the requirements set out in Policy SP14: Site BA1 – North of Baldock (k) of the Local Plan. Officers have investigated the impact that this requirement would have on development. The requirement to maintain a 250m buffer would reduce the land available for development at the far eastern end of BA1 by approximately 3 – 3.5Ha. In order for the District Council to support this proposal, the Neighbourhood Plan would need to ensure that there is evidence to justify this distance and that there is no conflict with the overall aims of the Local Plan to deliver 2,800 home and the associated infrastructure.
	Criterion (b) – this criterion is not easy to read. It would be beneficial if the views are identified on a map to make it clear which views are being referred to in the policy. The inclusion of text from the Design Guidance would help to make the policy clearer. (See additional comments)
	Criterion (d) – This could be made clearer if text from the Design Guidance

	was reflected or included into this criterion. (See additional comments)
	Criterion (e) – Whilst Officers recognise that concern has been expressed from residents that increased traffic flows should be minimised (page 25), it might be that there is insufficient evidence from the traffic modelling to justify the provision of any measures to minimise perceived increases in traffic flows.
	Criterion (f) – Bygrave Parish Council should be deleted from the policy. This is too specific. The requirement for a community hall should be sufficiently flexible for any community group, including the Parish Council.
Page 28	Officers consider that the wording in Policy E8 (b), “avoid new buildings on that part of BA3 that lies immediately to the east of the existing properties on Aleyn Way and Merchants Walk, and on the higher ground immediately south of Royston Road, which should be retained and enhanced as space for informal outdoor recreation” is too restrictive. The “corridor” through this part of the site known as BA3, might be able to accommodate the required “link” road and some development and the policy should be more flexible.
Page 39 Annex D	In addition to the list of Buildings of Local Importance in Baldock, the neighbourhood plan could also include suggestions for the villages of Clothall, Bygrave and Luffenhall. See comments against p.15 above.

## Baldock, Bygrave and Clothall Neighbourhood Plan – Design Guidelines

Page / Section or Policy reference	NHDC Officer comments
General comments	As a general comment, the Design Guidance is not very specific to the allocated sites in Baldock, particularly in relation to the guidance set out for urban extensions.
Page 24 3 <sup>rd</sup> paragraph	Cycle paths – the final sentence in this section provides some clarity to Policy E6 : Development north of the railway. This sentence should be reflected or simply repeated in the policy to ensure that the policy requirement for the treatment of Bygrave / Ashwell Road is clearer.
Page 25	<p>Landmarks and vistas – the second paragraph appears to provide additional clarity for Policy E6(c). This sentence should be repeated in the policy to ensure that the policy requirement for the views across the valley from upper Bygrave to Baldock is clear.</p> <p>A map illustrating the important views into and out of Baldock would be helpful.</p>
Page 58 BA6: Land at Icknield Way	The Design Guidance includes details for one of the sites allocated in the Local Plan for residential development. It should be noted that a planning application has been submitted for BA6: Land at Icknield Way and negotiations are at an advanced stage.