

## **ERPC: Council response to the Sustainability Appraisal Report January 2014**

1. Sustainability Appraisal and Plan preparation are part of the same iterative process of testing and refinement. The draft District Plan has been independently assessed through the Sustainability Appraisal. Below the Council's responses to the Sustainability Appraisal are set out, for Part 1: Development Strategy and Part 2 Topic Policies.

### **Part 1 of the Draft District Plan: Development Strategy**

2. The Sustainability Appraisal assessed seven alternatives to the Council's Preferred Option. **Tables 11.3 and 11.4 of the Interim SA Report** as presented below summarise the alternatives appraisal and the Council's response, i.e. the Council's reasons for selecting the preferred approach in light of appraisal findings. Table 11.4 (which considers each option in turn) is something of a 'refinement' of Table 11.3 (which considers each SA topic in turn). Further alternatives appraisal text is also presented in **Appendix B**.

### **Part 2 of the Draft District Plan: Topic Policies**

3. The Interim SA makes several recommendations where policies could be amended to improve their clarity or expand upon detail. Where these recommendations were raised early on in the process, they have already been incorporated into the latest version of the Draft District Plan being presented to Members in January and the SA Report details these changes in the information boxes throughout Part 2. Other recommendations will need to be actioned through minor amendments to policies through discussion with Members or through minor amendments following approval by Council.
4. Where recommendations will require further work, these will be resolved following the consultation stage. Some recommendations will, by necessity, be resolved only through the preparation of the Broad Locations Development Plan Document, which will set out in detail, the expectations of development and what they should achieve when they are progressed.
5. **Table 3** below illustrates the recommendations of the Interim SA and the Council's response. Some of this table reflects changes that have already been made and is therefore detailed within the SA

Report. This table also indicates where further changes will be necessary in the next stage of the District Plan.

### **Interim SA – Conclusions for the Development Strategy**

6. The Interim Sustainability Appraisal illustrates that whilst there are some potential negative impacts associated with the proposed development strategy, the alternative options are less sustainable when viewed in the round against Option 1, the Preferred Option.
7. Given the level of housing need, the only alternatives include large urban extensions east of Stevenage and west of Sawbridgeworth, both of which would result in low levels of self-containment and significant landscape impact. Other options, including higher levels of growth at the three broad locations, and the new settlements elsewhere in the district, are of doubtful deliverability, and cannot be considered

Table 11.3: Alternatives appraisal findings and Council response – by Topic

SA Topic	Alternatives appraisal findings	Council response
<b>Air quality</b>	<p>The impacts on the Air Quality Management Areas in Bishop's Stortford, Hertford, and Sawbridgeworth is the main concern, and therefore the Preferred Option (Option 1) performs less well, although some mitigation measures may be feasible. The best option would be to concentrate development with high levels of self-containment and avoid the towns with AQMAs (Option 7, followed by a new settlement in a transport corridor - Option 6). Sawbridgeworth bypass could avoid the AQMA there (Option 3). Higher levels of growth (Option 8) are more likely to be detrimental. A lower level of growth at the Gilston Area (Option 5) is less likely to fund a Harlow Northern Bypass (A414-M11) which could channel traffic onto the M11 and away from the European Sites in the Lea Valley, Broxbourne-Hoddesdonpark Woods and Epping Forest.</p>	<p>The impact on the Bishop's Stortford and Sawbridgeworth AQMAs will be studied further through the Urban Transport Plan during 2014, and on Hertford through the A414 study due to report in Spring 2014.</p> <p>Whilst AQMAs are considered to be important, the Council is not aware of examples where the Planning Inspectorate has sought to reject growth options on this basis.</p> <p>The provision of an A414-M11 northern link road would have air quality benefits but the deliverability is uncertain. The Broad Locations DPD should assess this in more detail. A Sawbridgeworth Bypass would not address the Duty to Co-Operate with Harlow.</p> <p>A final Habitats Regulations Assessment will be undertaken prior to examination of the District Plan, to understand the impacts on the European Sites.</p>
<b>Biodiversity and green infrastructure</b>	<p>Much of the biodiversity and leisure interest lies along the river corridors which are protected under all the options. There are relatively low levels of differentiation because all the development options involve some development in the vicinity of areas of biodiversity, and all involve some development on agricultural fields low in biodiversity. Therefore more detailed site-specific consideration will be necessary during future planning stages, which will also need a sustainable drainage strategy to minimise run-off risks to sensitive sites, for example Hunsdon Meads SSSI and the Lea Valley.</p>	<p>The Supporting Document shows how the development strategy has been prepared to reflect the impacts on the hierarchy of designations (NPPF Paragraph 113). As the SA points out, green infrastructure can mitigate impacts, and the draft policies (topic-based and settlement level) require this. Green Wedges and Green Fingers are a key part of the development strategy. Masterplanning and layout will be further considered through DPDs and SPDs.</p>

SA Topic	Alternatives appraisal findings	Council response
	<p>Option 6 (new settlement) could perform well if a suitable site can be found. Higher levels of growth in the Gilston Area (Options 7 and 8) perform least well because there is a risk that it could impinge on the streams through the area, although this could be mitigated through careful design. Although there is an option avoiding development at the edges of the market towns (Option 7), this would not perform better than the other options given the assumption that biodiversity interest would be preserved through appropriate green infrastructure.</p>	
<b>Climate change</b>	<p>Larger sites have better potential for clean energy infrastructure and better prospects for self-containment to reduce out-commuting and therefore lower vehicle emissions.</p> <p>West of Sawbridgeworth (Option 3) would likely be less self-contained. Concentrating growth in the Gilston Area (Options 7 and 8) would support self-containment and delivery of clean energy infrastructure.</p>	<p>The District Plan is set to contain policies to promote low carbon heating, particularly at the larger development locations. Masterplanning of development to increase self-containment and design in low carbon technology will be a feature of the Broad Locations DPD.</p>
<b>Community and wellbeing</b>	<p>Options are assumed to perform better where the effect would be to support provision of new or better facilities, or enable existing facilities to perform better.</p> <p>Option 8 (high growth) performs well as it provides for new facilities across the district. Option 2 performs next best because it could provide facilities in the Gilston area, Ware, and Welwyn Garden City, followed by Option 3 (Welwyn Garden City and Ware but not the Gilston Area). Options 3, 4, 5, and 6 which do not provide an urban extension North and</p>	<p>It is acknowledged that East of Welwyn Garden City will look to that town for many of its services. This is a part of the Duty-to-Cooperate in terms of cross-boundary strategic priorities and will need further work with Welwyn Hatfield Borough Council.</p> <p>Agreed that the new school capacity at Ware is likely to be a significant issue. This will be assessed further through the Broad Locations DPD.</p> <p>Agreed that Option 7 (avoiding urban extensions to the towns and focusing on the Gilston Area) would</p>

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	<p>East of Ware for new schools in the Hertford/Ware catchment perform poorly. Option 3 is ranked below Option 2 because there are doubts of the ability of a small town like Sawbridgeworth to provide substantial facilities, even with high levels of growth. Option 7 (avoid urban extensions) performs poorly as it would not provide opportunities to enhance community facilities through development.</p>	<p>have negative impacts and this supports the proposed development strategy. Whilst Option 8 could perform well in terms of this topic, the Interim Development Strategy Report finds that deliverability of this level of development to look very doubtful.</p>
<p><b>Economy &amp; employment</b></p>	<p>Options which enable a spread of employment opportunities in viable locations are assumed to perform well. In particular, it is important to consider that the A414 is a key connective transport route between the life science industries stretching from Harlow, Ware, and Welwyn Garden City through to Stevenage; and that Bishop's Stortford is an attractive location given its proximity to the M11 and Stansted Airport.</p> <p>- Option 8 performs best, followed by Option 2 and then Option 1. The Gilston Area (Option 5) performs better than the East of Stevenage (Option 4) because it is closer to the main employment areas and therefore more viable. A new settlement (Option 6) may not be as viable as opportunities closer to existing employment clusters. West of Sawbridgeworth (Option 3) is not an attractive location for business. Option 7 would not capitalise on opportunities for employment growth at Bishop's Stortford.</p>	<p>The Strategy Economic Development Advice (DTZ, 2012) shows that East Herts functions primarily as a source of labour and is generally not well suited as a location of new strategic business parks. The study also drew attention to the increase in service jobs outside employment areas which results from housing development and greater population.</p> <p>Agreed that Sawbridgeworth is not an attractive location for a new employment area and therefore a large urban extension (Option 3) is not appropriate.</p> <p>Agreed that Bishop's Stortford is the premier location in the district for new employment due to its links to Stansted Airport. Each urban extension would have the potential to build in a mixture of uses, thus providing small scale employment opportunities. Hence Option 7 performs poorly in this respect as these opportunities would be lost.</p> <p>Whilst Option 8 could support significant employment the DTZ study identified the relative lack of attraction of the Gilston area for a strategic business park due to distance from the M11. It also drew attention to competition with the Harlow Enterprise Zone. However, the A414 east-west is a key strategic</p>

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		<p>corridor; albeit congestion is a consideration.</p> <p>Given the existing high level of out-commuting, a high growth option would need to create considerable new employment opportunities to counter this or at least retain the status quo. The approach to a Broad Locations DPD potentially enables new employment and mixed-use development in locations close to the A414, subject to satisfactory resolution of the transport impacts.</p>
<b>Historic Environment</b>	<p>Historic assets such as scheduled monuments and listed buildings can be protected through sensitive design and layout regardless of the broad spatial strategy. However, if the topic is extended to include the setting of towns then some differentiation between the alternatives is possible. 'Concentration' options would potentially impact places less.</p> <p>On this basis, the options for 5,000 dwellings East of Stevenage, in the Gilston Area, and at a new settlement, are all likely to perform similarly well. Option 7 also performs well on the basis that urban extensions to market towns would be avoided; however, focusing in the Gilston Area would lead to impacts on Sawbridgeworth and would affect the original urban form of Harlow. A large urban extension to Ware (Option 2) and Sawbridgeworth (Option 3) would be out of character. Under the preferred approach North and East of Ware (1,800) there will be a need to pay careful attention to historic assets, e.g. Fanhams Hall.</p>	<p>The preferred sites and broad locations have been selected to minimise impacts on the historic environment. For example, Historic Parks and Gardens have been avoided, as explained in the Supporting Document. Some impact on the setting of towns is inevitable.</p> <p>The Broad Locations DPD will pay careful attention to the treatment of Fanhams Hall.</p> <p>The topic-based policies and settlement-specific policies provide a framework for sensitive treatment of historic assets, for example including buffer areas and incorporating assets within green infrastructure.</p> <p>Finally, it is important to consider that the District Plan is a way to protect the historic character of the District given the threat of 'planning by appeal' at the Market Towns without a plan in place.</p>
<b>Housing</b>	Options which achieve a spread of housing across the housing market areas to meet need within each	The Interim Development Strategy Report includes a section on the Duty to Co-Operate which looks at the

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	<p>area perform better.</p> <p>Options 1 and 8 could meet the needs of two wider housing market areas including settlements outside the district, whereas Options 2, 3, 4, 5, and 7 have the potential to meet the needs on only one, and Option 6 (new settlement) could meet the needs of none. Option 8 (high growth) would deliver most housing in addition and also potentially meet the needs of another area and therefore performs best. Option 7 (focus on the Gilston Area and avoid urban extensions to market towns) performs worst.</p>	<p>issue of unmet housing need across district boundaries. East Herts Council will need to work with Stevenage and North Herts Councils to assess suitable long-term growth locations to meet Stevenage's needs beyond 2031. Further discussions will be needed with Harlow and Welwyn Hatfield Councils in relation to unmet needs and the proposed Broad Locations.</p>
<b>Land</b>	<p>All options would require significant release of greenfield sites since the supply of brownfield and other urban land is very limited. All options except Option 6 require extensive release of Green Belt sites. Therefore Option 6 performs best (on the assumption that a new settlement would be located outside the Green Belt). Option 7 would require the next least amount of Green Belt release although this is a highly significant part of strategic Green Belt including the Stort Valley. Option 8 would require the most Green Belt release and therefore ranks worst. All options would result in loss of areas of Grade 2 agricultural land.</p>	<p>Option 6 (new settlement) is not considered realistic at this stage, since the land is not proposed in most cases and in all cases the infrastructure planning has not yet even reached infancy. Paragraph 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development when reviewing Green Belt boundaries.</p> <p>It is acknowledged that all options would result in the loss of Grade 2 Agricultural Land. Within each classification there are pockets of good and poor quality agricultural land. It is therefore necessary to ensure the DPD approach makes provision for the assessment of specific sites, mitigation measures and improvements to adjacent land where necessary.</p>
<b>Landscape</b>	<p>Key considerations are the quality and openness of the landscape, taking account of the Landscape Character Assessment (2007).</p>	<p>The Council acknowledges that there will be unavoidable landscape impacts given the scale of the housing requirement. There is no reasonable alternative that would avoid impacts, and some</p>

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	<p>Option 7 performs best because it concentrates development away from the majority of character areas, although impacts in the Gilston Area would be significant. A new settlement (Option 6) could choose a site to limit landscape impacts, although this would need to be subject to site-specific assessment. Other options are all likely to encroach into some attractive open countryside. East of Stevenage (Option 4) performs poorly due to impact on the sensitive Beane Valley.</p>	<p>would lead to impacts over and above the preferred approach. The preferred approach protects the most valuable landscape areas, for example the Beane Valley and the Stort Valley.</p> <p>District Plan policies require that design and layout, masterplanning, green infrastructure and landscaping minimise the impacts as much as possible.</p> <p>The Broad Locations DPD will need to give careful consideration to these issues as part of a masterplanning exercise.</p> <p>Additional site-specific impacts the Council is aware of include the sloping landscape south of Bishop's Stortford.</p>
<p><b>Transport</b></p>	<p>Larger developments (i.e. those of at least 5,000 homes) providing more services and facilities, and those better linked into existing settlements, are more likely to be self-contained, reducing the need to travel by car.</p> <p>Option 7 concentrates development at a 10,000 home development and so performs best in some respects. A concentration of growth in the Gilston Area (Option 5) is preferable to East of Stevenage (Option 4) in terms of connectivity. Options 1 and 2 are not ideal in that they would not concentrate development to a great extent, i.e. no single 5,000 home development is proposed. However, these options have the potential to create developments that are well-connected to existing towns and services. Sawbridgeworth (Option 3) is a small town with low potential for significant self-containment,</p>	<p>The feasibility of self-containment will need to be explored further through the District Plan. The separate transport assessments (see the Transport Update, November 2013) draw attention to the impacts of additional traffic on the network. The SA provides a different perspective.</p> <p>The Broad Locations DPD introduces safeguards which mean that very large options will not come forward until a robust framework for managing the transport impacts is in place.</p> <p>Deliverability of transport issues is a difficult issue for plan-making. Working with Hertfordshire and Essex County Councils and the Highways Agency, the Council will undertake a number of additional studies to further assess transport impacts prior to the submission stage.</p>



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	<p>even with a bypass. A distinct new settlement (Option 6) distant from other towns and (most likely) a railway station is assumed to perform poorly.</p>	
<p><b>Water</b></p>	<p>There may be greater potential for sustainability features including rainwater harvesting at very large sites. Option 7 performs well on this basis. Option 8 would result in a greater level of development and so could cancel out this efficiency gain.</p>	<p>The Council has worked closely with the Environment Agency and the water companies on the issue of the environmental impacts of low-flows in rivers. Water supply is a national policy issue involving a trade-off between the consumer price of water (championed by OFWAT) and the environmental impacts (championed by the Environment Agency). This trade-off can only be addressed at the national level. The Council proposes to introduce water efficiency requirements through the District Plan to address this issue as far as the remit of the local planning authorities allows. The Council is not aware of any cases where the Planning Inspectorate has reduced levels of development because of water supply concerns.</p>

Table 11.4: Key findings for each option and the Council's response

Option	Key appraisal findings	Council Response
<b>1: Preferred Option</b>	This option (the preferred approach) would result in some negative impacts on the landscape North and East of Ware and in the Gilston Area (as well as at some of the locations allocated for housing surrounding the market towns). Some negative impacts on air quality are also likely. Importantly, this option would enable the benefits of development, including new jobs as well as homes, to be spread around the District where they are needed.	It is acknowledged that there will be some negative impacts associated with implementing the preferred option; however, these are outweighed by the benefits. In terms of air quality, the Council will work with Environmental Health and Transport authorities to further understand the impacts and potential mitigation measures. The commitment to a Broad Locations DPD provides a safeguard to ensure that appropriately detailed assessment of the impacts is undertaken. It is important to remember that the development strategy has to comply with NPPF policy requirements including the Duty to Co-Operate and the five year housing land supply. These requirements can only be met by the preferred option.
<b>2: Focus on Welwyn Garden City and Ware</b>	This option would have some advantages because it would avoid the negative landscape impacts of development in the Gilston Area; however, the landscape impacts would be significant North and East of Ware.	Whilst there could be benefits to this option and it could be considered realistic in some respects, it would not comply with the Duty to Co-Operate in relation to Harlow District Council because it does not include the Gilston Area. The deliverability of 3,000 dwellings North and East of Ware will need further assessment through the Broad Locations DPD.
<b>3: Focus on Welwyn Garden City and Sawbridgeworth</b>	A large extension West of Sawbridgeworth would not be self-contained, and would likely result in many car-based trips to Bishop's Stortford and Harlow. It is a relatively unattractive location for new employment; and landscape impacts would be	This confirms the decision of the Council to drop the 'West of Sawbridgeworth' option from the selected development strategy. Also, as with Option 2, this option does not involve growth in the Gilston Area and hence would fail when assessed against the

Option	Key appraisal findings	Council Response
	similar to those for the Gilston Area.	Duty to Co-Operate.
<b>4: Focus on Stevenage</b>	East of Stevenage could help to address some of Stevenage's unmet housing need; however, it would have highly negative impacts on the sensitive Beane Valley landscape and would be less self-contained than the Gilston Area owing to the greater distance from the railway station, town centre and main employment areas.	This confirms the conclusions of Chapter 4 of the Supporting Document. Land in North Herts is beyond the scope of this sustainability appraisal, but it is clear that East Herts Council will need to continue to discuss Stevenage's long-term housing needs and growth aspirations (beyond 2031) with Stevenage and North Herts Councils.
<b>5: Focus on the Gilston Area</b>	A larger development in the Gilston Area could be better self-contained and provide a wide range of community infrastructure. It would also remove the need for an urban extension at Ware which could be out of character with this small town. However, this option would not meet housing needs in the A10 Corridor Housing Market Area, in particular for Ware, and potentially also in the A1(M) Corridor.	This option would fail when assessed against the Duty to Co-operate in relation to Welwyn Hatfield Borough because the area is needed for a new secondary school to help provide additional schools capacity for Welwyn Garden City. This option would also risk not being able to find an appropriate location for school sites in the Hertford-Ware catchment area. It is questionable whether a development in the Gilston Area of 5,000 homes is deliverable by 2031.
<b>6: Focus on a new settlement</b>	Potential benefits of a new settlement in a transport corridor could in theory encourage self-containment, and the ability to relieve some of the pressure on air quality and the transport network in the busier southern parts of the district. However, this would largely depend upon its location and opportunities for bus and rail connectivity. Without such connectivity, this option has the potential to result in greater levels of out-commuting by car. A new settlement option of 5,000 homes may not be sufficient to enable high levels of self-containment.	Policy DPS6: Long-term Planning commits the Council to further assessment of this option, in part as a contingency measure in the event that the Broad Locations DPD cannot resolve the challenges to development at those locations.
<b>7: Focus on the Gilston Area,</b>	This option would mean that the impact of development on the landscape and historic character	Whilst the potential sustainability benefits of this option are acknowledged, it would not meet NPPF

Option	Key appraisal findings	Council Response
<p><b>avoiding extensions to market towns</b></p>	<p>of the market towns would be lessened. It would also provide a self-contained development in the Gilston Area and reduce the air quality impacts. However, it would also mean that existing residents would not benefit from new community infrastructure (such as new schools and other community facilities) and additional local employment opportunities. The provision of the new Panshanger County Park and the remediation of the despoiled land north of Welwyn Road West of Hertford would be less likely to be achieved. Housing needs would not be met locally (i.e. near to the town where they arise), and some logical sites would not come forward.</p>	<p>requirements in terms of the five-year housing land supply in the period 2016-2021. The scale and pace of development in the Gilston Area could not match the speed of delivery from multiple smaller urban extensions early in the plan period, since these latter locations can be brought forward simultaneously by different developers and do not rely on the provision of expensive infrastructure.</p>
<p><b>8: High growth at Welwyn Garden City, Ware, and the Gilston Area</b></p>	<p>Positives include the delivery of greater amounts of community infrastructure and services, potential for clean energy generation, and higher levels of self-containment. There would be a negative impact on the landscape in the Gilston Area and North and East of Ware (as well as at some of the locations allocated for housing surrounding the market towns).</p>	<p>Whilst higher levels of development could in theory have some benefits, there are major question-marks surrounding the deliverability of such an approach. Detailed discussion on this matter is presented within the Supporting Document and the Interim Development Strategy Report. Whilst the current conclusion is that there is insufficient certainty regarding deliverability of higher levels of growth, further work will need to be done prior to submission in order to confirm this.</p>

**Table 3: Recommendations in Part 2 of the Interim SA Report and the Council’s Response**

Paragraph	Recommendation	Response
<b>13.3.7</b>	It is recommended that NE2 (Species and Habitats) be revisited to ensure that it is clear and implementable. The reference to enhancing ‘landscape quality’ could perhaps either be expanded upon (to reflect the importance of considering the biodiversity of a site in the context of the wider landscape) or removed. If point ‘V’ is concerned with compensation, then this should be made clear. The Council might wish to make reference to Defra’s biodiversity offsetting metric and particular instances where its application might be appropriate.	Reference to Landscape Quality has been removed from Policy NE2 as it was out of context and not necessary.  The matter of biodiversity offsetting or compensation will need to be resolved through stakeholder consultation. Offsetting is not a principle that is currently supported by the Council. Avoidance of harm or mitigation is the preferred approach.
<b>13.3.14</b>	HA8 (Historic Parks and Gardens) may help to support biodiversity given that these areas comprise a variety of features such as landscaped parkland, planted gardens and open water features; however, it is noted that no specific cross-reference is made to the achievement of biodiversity objectives.	This will be addressed prior to consultation through minor amendments to Policy HA8 and supporting text as appropriate.
<b>13.3.15</b>	In terms of the approach to site specific and area-wide ‘topic’ policy, the proposed approach is adequate; however, it is suggested that there could be some greater potential to set policy to ensure that the district’s Green Infrastructure Plan is fully reflected.	This will be addressed through the consultation process and through ongoing work with relevant stakeholders.  More detail will be included in the Broad Locations Development Plan Document as appropriate.
<b>13.4.7</b>	The majority of the site specific policies that relate to greenfield locations include a generic requirement for “sustainable urban drainage and provision for flood mitigation”. For reasons that are unclear, this requirement does not appear in any of the HERT (Hertford) policies.	The Hertford policies referred to have been amended in the draft being presented to Members on 16 January 2014. These last two sentences have been deleted from the SA Report.

	It is recommended that the policies for sites in and around Hertford establish a requirement for sustainable urban drainage and provision for flood mitigation.	
<b>13.4.9</b>	It is recommended that the following statement within the supporting text to Policy CC3 (Renewable and Low Carbon Energy) is reviewed: “Some renewable forms of energy used for heating may, cumulatively or in isolation, result in a rise in particulates which can be harmful to human health. For this reason such technologies will not be permitted within or near the urban areas of settlements, as explained in Policy EQ4 (Air Quality) (see Chapter 22: Environmental Quality).” A more flexible policy approach may be appropriate. It is important to support renewable / low carbon energy schemes where they are able to demonstrate that no impacts to air quality / human health will occur.	<p>This will be addressed prior to consultation through minor amendments to Policy CC3 and supporting text as appropriate.</p> <p>There is a need to ensure an appropriate balance is met between supporting renewable energy and protecting human health.</p>
<b>13.4.14</b>	The broad spatial approach to growth reflects a desire to support larger developments, where there will be the potential to fund and design-in decentralised energy generation / district heating schemes; however, it is suggested that policy guidance could go further in terms of clarifying the Council’s expectations in this respect.	This matter will be addressed in the Broad Locations Development Plan Document, where more detail will be provided as to the Council’s expectations. It is unlikely that developments of less than 500 dwellings would support district heating schemes due to the economies of scale required.
<b>13.5.7</b>	<p>Eight of the site specific (BISH, BUNT, EWEL, SAWB, GA, and WARE) policies identify specific elements of ‘social infrastructure’ that must be delivered... It is not clear why no ‘social infrastructure’ requirements are listed for the HERT (Hertford) site allocations.</p> <p>It is recommended that the HERT policies provide further clarity with regards to delivery of necessary social infrastructure.</p>	The Hertford policies referred to have been amended in the draft being presented to Members on 16 January 2014. These last two sentences can be deleted from the Interim SA Report.

<b>13.9.4</b>	The approach to housing density reflects the ambition to achieve attractive and functioning new communities, e.g. communities that incorporate green infrastructure. The proposals, therefore, do not perform as well as they might do in terms of the objective to 'use land efficiently'; however, significant negative effects are unlikely.	This is a matter of priorities. The Council's position is to ensure development provides the necessary supporting infrastructure, which includes open spaces. This will mean that lower densities are achieved, but using land effectively is not simply about built development, but about ensuring the right type of development is delivered.
<b>13.10.6</b>	The broad spatial approach to growth performs well from a landscape perspective...). In terms of the approach to site specific and area-wide 'topic' policy, the proposed approach is adequate; however, it is suggested that there could be some greater potential to set further policy to ensure that strategic objectives are realised.	This will be addressed through the consultation process and through ongoing work with relevant stakeholders.  More detail will be included in the Broad Locations Development Plan Document as appropriate.