

# Sustainability Appraisal (SA) of the East Herts District Plan

SA Report Addendum

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## Quality information

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# 1. Introduction

## Background

- 1.1 The East Herts District Plan, once adopted, will establish a spatial strategy for growth and change in the District up to 2033, allocate strategic sites and establish strategic and development management policies.
- 1.2 The plan is at an advanced stage of preparation, having been formally published in November 2016 ahead of being submitted to Government for examination in March 2017; and then having been the focus of examination hearings in October/November 2017 as well as a joint hearing session with Welwyn Hatfield Borough Council in January 2018. During the hearings, the Inspector gave her preliminary views on the matters discussed and indicated that modifications would need to be made to the Plan. She invited the council to develop a list of proposed modifications, for her agreement and subsequent publication.
- 1.3 At the current time, work to prepare and agree proposed Main Modifications has been completed and proposed modifications are now published for consultation.

## Sustainability Appraisal (SA)

- 1.4 The District Plan is being developed alongside a process of Sustainability Appraisal (SA), a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

## Purpose and Structure of this SA Report Addendum

- 1.5 The aim of this SA Report Addendum is essentially to present information on the proposed modifications, and alternatives where appropriate, with a view to informing the current consultation and subsequent plan finalisation.
- 1.6 This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report published in 2016 and submitted in 2017 [Exam ref: SUB/004]. Whilst the focus of this report is on proposed modifications, there is a need to bear in mind that the proposed modifications will (if taken forward) be implemented alongside the rest of the District Plan, i.e. that part which is not set to be modified. For this reason, explicit consideration is also given to the effects of the District Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Plan as submitted).
- 1.7 This SA Report Addendum is structured as follows:
  - **Chapter 2** - presents the scope of the SA;
  - **Chapter 3** - explains the method and presents the findings of the screening of proposed modifications;
  - **Chapter 4** - presents a discussion around alternatives in light of the proposed modifications;
  - **Chapter 5** - explains the method and presents the findings of the appraisal for proposed modifications that were 'screened-in'; and
  - **Chapter 6** - sets out the next steps in plan-making and the SA process as well as any changes to previously proposed monitoring measures.



## 2. What's the scope of the SA?

### The SA Framework

2.1 The scope of SA work, with respect to the East Herts District Plan, is introduced within the SA Report submitted in 2017 [Exam ref: SUB/004]. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological 'framework' for appraisal. The SA objectives are listed below in **Table 2.1** below. It has not been necessary to update the SA framework for the purposes of this appraisal.

**Table 2.1: The SA framework**

SA topics	SA objectives
Air quality	<ul style="list-style-type: none"> <li>Improve air quality in AQMAs and other areas exceeding air quality objective levels.</li> <li>Protect problem areas / areas of known sensitivity from traffic congestion and polluting activities.</li> </ul>
Biodiversity and green infrastructure	<ul style="list-style-type: none"> <li>Protect and enhance areas designated for nature conservation including key biodiversity areas and Local Wildlife Sites.</li> <li>Plan for multi-functional green infrastructure at different scales, including within major developments and across administrative boundaries.</li> </ul>
Climate change (mitigation & adaptation)	<ul style="list-style-type: none"> <li>Aim to lower per capita GHG (greenhouse gas) emissions.</li> <li>Increase the amount of energy generated by decentralised or renewable sources.</li> <li>Minimise the impact of development on surface water flooding and avoid development within areas of flood risk.</li> <li>Support water efficiency and energy efficiency.</li> </ul>
Community and wellbeing	<ul style="list-style-type: none"> <li>Meet the needs (including health and social care) of a growing and ageing population.</li> <li>Plan for those with specialist needs, including the disabled population.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Support targeted job creation, e.g. capitalising on expansion of Stansted Airport.</li> <li>Match job creation with the provision of appropriate facilities and infrastructure.</li> <li>Support greater rates of gross value added (GVA).</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>Protect the District's historic environmental assets (both designated and non-designated) from inappropriate development.</li> <li>Capitalise on the potential that historic assets have to contribute towards place-shaping (e.g. as the inspiration for design).</li> <li>Recognise the potential for unknown historic sites to act as a constraint on development.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Provide for sufficient new dwellings over the plan period, including specialist housing.</li> <li>Increase the provision of affordable housing.</li> <li>Provide additional Gypsy and Traveller pitches, in appropriate locations, in line with up-to-date evidence on need.</li> </ul>
Land and waste	<ul style="list-style-type: none"> <li>Support efficient use of land, including development of previously developed land (PDL).</li> <li>Support the remediation of contaminated land.</li> <li>Consider waste minimisation at the design stage of development.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Protect and enhance the district's landscape character areas and key landscape assets.</li> <li>Ensure that landscape assets, such as hedgerows, are protected and integrated within development (to maximise their potential amenity value).</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Facilitate a modal shift away from the private car, with a particular focus on reducing commuting by car.</li> <li>Although it is recognised that all new development will add to congestion through increased vehicle movement, there is a need to ensure that the impacts are not</li> </ul>



SA topics	SA objectives
	severe. <ul style="list-style-type: none"> <li>• Seek to improve rural accessibility to bus services.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• The sub-region experiences water scarcity, and this is likely to be exacerbated due to climate change and future growth and development.</li> <li>• Support reduced per capita consumption of water.</li> <li>• Distribute development taking into account water supply and sewerage infrastructure.</li> <li>• Prevent contamination of the major aquifer beneath East Herts.</li> </ul>



## 3. Screening of proposed modifications

### Introduction

- 3.1 The Council is proposing a number of minor and Main Modifications to the submitted District Plan as a result of updated evidence and the examination hearing sessions. It is necessary to screen the Main Modifications to determine if they significantly affect the findings of the submitted SA Report [Exam ref: SUB/004] and if further appraisal work is therefore required.

### Method

- 3.2 All of the proposed Main Modifications were screened to determine if further SA work was required or they could be screened out from appraisal. The findings of the screening including the rationale for why a main modification was screened in or out are provided in **Appendix I**. Minor modifications mainly relate to minor edits to the Plan text and have therefore been screened out as not being significant in terms of the SA, i.e. they would be inherently unlikely to give rise to significant effects.

### Screening findings

- 3.3 The majority of the proposed Main Modifications were screened out as they seek to provide further clarification regarding the Plan's intentions and do not significantly affect the findings of the previous SA work [Exam ref: SUB/004]. **Table 3.1** below indicates which of the Main Modifications have been 'screened-in' for the purposes of SA and the rationale for the decision taken. The justification for why a main modification has been 'screened-out' is provided in **Appendix I**.

**Table 3.1: Screening the Main Modifications for the purposes of SA**

Main Mod. Ref	Focus (changes in relation to...)	Screened into SA?	Rationale
MM/3/01- MM/3/07	<b>Policy DPS1 (Housing, Employment and Retail Growth)</b> Changes to the supporting text and policy to reflect updated housing and employment need figures.	Yes	The policy has been amended to reflect updated housing and employment figures. The overall level of housing growth to be delivered during the life of the Plan has not significantly changed. There are no new site allocations proposed and the majority of the increased housing growth is as a result of an increase to the windfall allowance as well as the number of completions and commitments to reflect updated evidence. These changes to the housing numbers are not significant in terms of the SA. They do not necessitate further consideration of alternatives (Part 2 of the SA Report) or affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004]. However, the amount of employment land to be delivered during the life of the Plan has almost doubled from 10-11 to 19-20 hectares for B1/B2/B8 uses. <sup>1</sup> This is a significant change and should be considered in further detail through the SA.
MM/11/08	<b>Policy GA1 (The Gilston Area)</b> Changes to the policy to reflect issues raised by the Inspector and other stakeholders as well as to reflect the	Yes	There have been a number of changes to this policy. The majority seek to provide further clarity around the total level of growth to be delivered during and after the plan period in the Gilston area as well as the key principles for development. The policy now includes the requirement for the delivery of an employment area of around 5 ha.

<sup>1</sup> B1 is office, B2 is general industrial and B8 is storage and distribution.  
[https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)



Main Mod. Ref	Focus (changes in relation to...)	Screened into SA?	Rationale
	work that is now taking place in relation to the Harlow and Gilston Garden Town.		
MM/17/01-02	<b>New Policy DES1 (Masterplanning)</b>	Yes	New policy to provide greater clarity around Masterplanning. Should be considered through the SA.
MM/25/03-04	<b>New Policy DEL3 (Monitoring Framework)</b>	Yes	New policy that sets out measures to bring forward development if targets aren't being met.
MM/25/05-06	<b>New Policy DEL4 (Monitoring of the Gilston Area)</b>	Yes	New policy that commits the Council to monitoring the delivery of new housing in the Gilston Area.

- 3.4 The proposed modifications identified in the table above have been screened-in and carried forward for further consideration through the SA process. The proposed modifications that have been screened-out are presented in **Appendix I**.



## 4. Alternatives in light of proposed modifications

### Introduction

- 4.1 An important element of the SA process involves the development, refinement and appraisal of 'reasonable alternatives' to inform the development of the emerging District Plan. Part 1 of the SA Report [Exam ref: SUB/004] submitted in 2017 alongside the District Plan set out how the reasonable alternatives were established, presented the summary findings of the appraisal and provided the Council's outline reasons for progressing the preferred approach in light of reasonable alternatives.
- 4.2 This aim of this Chapter is to give consideration to reasonable alternatives in light of the proposed Main Modifications.

### The development strategy

- 4.3 The SA Report [Exam ref: SUB/004] explained, in Paragraphs 5.1.5 and 5.1.6 that, while the plan objectives are numerous and cover a range of issues, it was apparent that the key issue/objective<sup>2</sup> related to the identification of land to meet housing needs. Hence it was reasonable<sup>3</sup> that the consideration of alternatives through the SA process focused on the setting of the spatial strategy, which is at the heart of the Plan.
- 4.4 With this in mind, the focus of this Chapter and the narrative below is the proposed Main Modifications to Chapter 3 (The Development Strategy) of the District Plan, in particular Policies DPS1 (Housing, Employment and Retail Growth), DPS2 (The Development Strategy 2011-2033) and DPS3 (Housing Supply 2011-2033).
- 4.5 The key modifications to these policies for the purposes of the SA relate to the housing and employment figures and these changes have arisen predominantly as a result of updated evidence.

### Housing

- 4.6 A further SHMA update was carried out in 2017 taking into consideration the latest relevant evidence including the Department for Communities and Local Government's (now Ministry of Housing, Communities and Local Government) 2014 based household projections (July 2016). This update led to a revised objectively assessed housing need (OAHN) for the HMA of 51,710 dwellings from a previous figure of 46,100 while the need for affordable housing remained largely unchanged from the 2015 SHMA.<sup>4</sup>
- 4.7 The latest update identified a slightly increased OAHN for three of the four local authorities in the HMA, including East Herts District Council. The OAHN for East Herts District was calculated to have risen from 16,390 to 18,458 new homes by 2033.
- 4.8 However, as the increase had been largely anticipated and accounted for in the HMA level work and preferred spatial strategy, the updated overall housing need across the entire HMA remained broadly consistent with what had already been agreed (signed Memorandum of Understanding, March 2017). It was therefore not considered necessary to revisit alternatives for the level and distribution of growth for the HMA set out in the signed MoU (March 2017).

<sup>2</sup> In line with the Environmental Assessment of Plans and Programmes Regulations (2004), a decision on what 'reasonably' should be the focus of alternatives appraisal should be made in-light of the plan objectives. In the case of the East Herts District Plan, it is suggested that plan objectives (2) and (3), which relate to meeting objectively assessed housing needs, are somewhat overarching.

<sup>3</sup> Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process / report that is focused and accessible.

<sup>4</sup> Opinion Research Services (2017) West Essex and East Hertfordshire Strategic Housing Market Assessment.  
<https://www.eastherts.gov.uk/article/35975/Updated-Housing-Information>



The SA of Strategic Spatial Options [Exam ref: HOP/002] published in 2016 considered three alternatives for the overall level of growth in the HMA, which included the delivery of ~ 46,000, ~ 49,638 and ~ 57,400 new homes within the HMA.<sup>5</sup> As such, higher numbers including figures approximating to and in excess of 51,710 new dwellings had already been tested and so there was no need to revisit the HMA-level optioneering work.

- 4.9 The Preferred Spatial Option to deliver c. 51,000 new homes across the HMA to 2033 and agreed through the signed MoU (March 2017) is broken down in **Table 4.1** below.

**Table 4.1: The preferred broad strategy for the HMA**

Local authority	Net new dwellings 2011-2033
<b>East Herts District Council</b>	<b>c. 18,000</b>
Epping Forest District Council	c. 11,400
Harlow District Council	c. 9,200
Uttlesford District Council	c. 12,500
<b>Total across the HMA</b>	<b>c. 51,100</b>

...of which the area in and around Harlow<sup>6</sup> will provide c. 16,100

- 4.10 In anticipation of the emerging preferred broad strategy for the HMA and the increased level of OAHN, the SA Report submitted alongside the District Plan explored spatial strategy options to deliver around 18,000 and 19,500 new homes over the Plan period. Alternative spatial strategy options to deliver the increased OAHN have therefore already been explored and appraised through the SA process. In terms of housing supply, no new sites have emerged during the examination process that would necessitate revisiting the identified options and the appraisal.
- 4.11 Alongside the increased OAHN, there have been a number of proposed modifications to Chapter 3 of the Plan in order to reflect the current situation in terms of the housing supply. While there have been changes to the windfall allowance as well as the number of completions and commitments, these are not significant with regard to the SA. On the whole, the proposed allocations remain the same and it is important to note that no new sites have been identified that would require revisiting the spatial strategy options.
- 4.12 In summary, while there have been a number of modifications to Chapter 3 to reflect updated housing and employment figures, the overall development strategy remains the same. The reasonable alternatives established and the findings of the appraisal presented in Part 1 of the SA Report submitted alongside the District Plan remain valid.

## Employment

- 4.13 While the consideration of alternatives through the SA process has focused on the spatial strategy and, in particular, the identification of land to meet housing needs, some consideration also needs to be given the delivery of employment land given updated evidence and the proposed Main Modifications.

### What is the issue?

- 4.14 Further work was carried out to understand the employment land needs associated with the full OAHN set out in the updated SHMA (July 2017). This work was undertaken across the Functional Economic Market Area (FEMA) in collaboration with the HMA authorities [West Essex and East Herts Assessment of Employment Needs - Exam ref: ED144]. This work concluded that for East Herts, there is a need for circa 3 to 7 hectares of office land and 13 hectares of industrial land between 2016 and 2033 (a total of between 16 and 20 hectares).<sup>7</sup>

<sup>5</sup> Epping, East Herts, Harlow and Uttlesford District Councils (2016) SA of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area. <https://www.eastherts.gov.uk/HOP>

<sup>6</sup> 'in and around Harlow' refers to development in Harlow Town as well as around Harlow in adjoining Districts.

<sup>7</sup> Hardisty Jones Associates (2017) West Essex and East Hertfordshire Assessment of Employment Needs.



This is an increase of between 6 to 9 ha of employment land during the life of the Plan compared to the 10 to 11 hectares proposed in the Pre-Submission Plan.

### What are the choices?

- 4.15 The Council's Matter 3 hearing statement<sup>8</sup> set out the emerging findings of the updated evidence in relation to employment needs. It also provided a summary of the Council's approach to the location of employment land across the District and at key settlements. As explained within the Council's Matter 3 statement, the initial Plan-making stages included several assessments of potential approaches to the location of employment land across the District. These are detailed in the East Herts District Plan Supporting Document [Exam ref: SSS/001].
- 4.16 The evidence suggests that there are no new available or suitable sites that could deliver significant employment land within the District. As set out within the Council's Matter 3 hearing statement, some consideration was given to potentially delivering some of the additional requirement at an aggregate crushing plant to the East of Welwyn Garden City, which is part of a larger site (some of which lies within Welwyn Hatfield Borough). However, as this site is currently in operation, the potential delivery of traditional B uses will depend upon the relocation or cessation of the current use. A Main Modification is proposed however, to acknowledge the current use of the site and to enable future use of this land for employment purposes in the future. As this is not a new employment site, no consideration of alternatives is required for this allocation.
- 4.17 As there are no new sites that could deliver a significant level of employment land, the remaining choices were to:
1. Not to deliver the additional employment land;
  2. Deliver the additional employment land on sites previously rejected sites through the plan-making process; or
  3. Deliver the additional employment land on sites already proposed for allocation in the District Plan.
- 4.18 Option 1 is not considered reasonable as it would not reflect updated evidence. Option 2 is also not considered reasonable as the reasons for rejecting these sites previously through the plan-making process are still valid. Sites need to conform to the preferred development strategy (Policy DPS2) and the additional employment land needs to be delivered in a sustainable location(s).
- 4.19 The Council has opted for Option 3 and has apportioned the additional employment land across two allocations: to the East of Welwyn Garden City (discussed in 4.16 above) and in the Gilston Area. The Gilston Area (Policy GA1) was selected to deliver 5 ha of employment land either through a standalone business park, or through employment uses at the neighbourhood centres. In line with the FEMA Study [Exam ref: ED144], the Council considers that the provision of employment land in this area improves the sustainability of the Gilston Area allocation as it will provide local opportunities for employment without compromising the regeneration objectives of neighbouring Harlow.
- 4.20 The Council's statement in response to Inspector's Matters and Issues (Matter 3) describes how additional employment land is expected to be created through windfall developments over the Plan period. Such developments are expected to be small scale and therefore not of relevance to the Sustainability Appraisal. The Plan already makes provision for new employment land in Bishop's Stortford, Buntingford, Hertford and Ware, and for new employment opportunities to the East of Stevenage and East of Welwyn Garden City. Further provision of new employment land in these locations is considered limited by either land availability, viability, highways or other environmental constraints.
- 4.21 The Council considers that delivering the full additional employment land requirement at any one of the proposed allocations would not be appropriate because the strategy underpinning the development strategy is one of creating sustainable communities with residential,

<sup>8</sup> <https://www.eastherts.gov.uk/article/36040/Hearing-Sessions-Weeks-1-and-2>



employment and supporting infrastructure. Varying the hectarage slightly at these locations would have marginal implications for sustainability and would therefore not merit detailed appraisal. A single employment area which would need to be of at least 10 hectares is unlikely to be viable or deliverable, and would not be a reasonable alternative to the distribution of employment land in several smaller locations which supports residential development in areas of good accessibility by public transport.

- 4.22 In summary, there are no other reasonable alternatives to the preferred approach for the delivery of the additional employment land currently set out within the proposed modifications.



## 5. Appraisal of the proposed modifications

### Introduction

- 5.1 This Chapter presents an appraisal of the 'screened-in' proposed modifications (see Table 3.1). Also, consideration is given to the effects of 'the submitted plan plus proposed modifications'.

### Methodology

- 5.2 The appraisal identifies and evaluates 'likely significant effects' of certain proposed modifications on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 2.1) as a methodological framework. To reiterate, the sustainability topics are as follows:
- Air quality
  - Biodiversity and green infrastructure
  - Climate change
  - Community and wellbeing
  - Economy and employment
  - Historic environment
  - Housing
  - Land
  - Landscape
  - Transport
  - Water
- 5.3 The focus of the appraisal is on the proposed Main Modifications (given that it is the proposed modifications that are currently the focus of consultation); however, explicit consideration is also given to the effects of the District Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Plan as submitted).
- 5.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to the nature of plan implementation and aspects of the baseline that might be impacted.
- 5.5 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on effects in more general terms.
- 5.6 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as appropriate. Cumulative effects are also considered, i.e. effects that become apparent once the effects of the East Herts District Plan are considered in a wider context (i.e. recognising that it will not be implemented 'in a vacuum').



# Appraisal of the proposed modifications

## Air quality

### Appraisal of proposed modifications

- 5.7 Of the Main Modifications screened in for the purposes of SA, the changes proposed for Policy DPS1 (Housing, Employment and Retail Growth) are the most relevant in terms of air quality. In particular, the delivery of an additional 9 ha of employment land over the life of the Plan, consisting of around 5 ha in the Gilston Area (Policy GA1), to the East of Welwyn Garden City in the future (Policy EWEL1) and within the wider Garden Town Area.
- 5.8 The delivery of the additional employment land has the potential to increase pressure on the local highway network in those areas. There has been extensive traffic modelling undertaken to understand the impacts of development across the HMA as well as at the District level on the highway network and identify the transport infrastructure necessary to support development. A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A).
- 5.9 Taking the findings of the transport modelling into account as well as the transport infrastructure to be delivered through the signed MoU, it is considered unlikely that the additional employment growth proposed would result in a significant increase in traffic and therefore a significant negative effect on air quality. If delivered as part of a high quality mixed use development, with good accessibility to sustainable transport modes, there is the potential to reduce reliance on the private vehicle as well as the need to travel.
- 5.10 It is noted that the main modification to Policy GA1 (The Gilston Area) proposes the inclusion of a key principle for development relating to integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

### Appraisal of 'the submitted plan plus proposed modifications'

- 5.11 The SA Report [Exam ref: SUB/004] concluded in Paragraphs 10.4.1 to 10.4.2:

*"The broad spatial strategy, viewed in isolation, does give rise to a risk of increased traffic congestion in Bishop's Stortford, Hertford and Sawbridgeworth; all of which are towns with designated Air Quality Management Areas (AQMAs). The proposed strategic infrastructure improvements within Policy DPS4 are vital to ensuring that the residual effects of increased traffic on air quality as a result of proposed development are reduced. It is important to note that mitigating the impacts of additional traffic within the town centres will also be reliant on the achievement of modal shift through successful take up of the improved sustainable transport modes and the successful application of travel planning.*

*Taking account of the evidence available, including mitigation provided through draft plan policies and available at the project level, it is predicted that there is the potential for a **residual minor negative effect** on air quality. It will be important to continue monitoring air quality and use the early review of the District Plan (Policy DPS5) to reflect on the effectiveness of proposed mitigation and take the opportunity to consider further measures if necessary".*

- 5.12 This conclusion broadly still holds true for 'the submitted plan plus proposed modifications'. However, the proposed revisions to Policy EQ4 (Air Quality) introduce more rigorous tests which seek to minimise air quality. In addition, the new Policy DEL3 (Monitoring Framework) introduces an annual monitoring of policies and the delivery of sites, thus facilitating more effective management of such issues. In terms of effects on the Epping Forest Special Area of Conservation, a signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A).



## Biodiversity and green infrastructure

### Appraisal of proposed modifications

- 5.13 Of the Main Modifications screened in for the purposes of SA, none are considered likely to result in any significant negative effects on biodiversity or green infrastructure. The delivery of an additional 5 ha of employment land in the Gilston Area, and to the East of Welwyn Garden City does not change the proposed boundary of these sites. The additional development will therefore not result in the loss and fragmentation of any additional habitats. Given the nature of employment development it is also not likely to significantly increase disturbance to habitats and species. There is the potential for an increased level of traffic; however, the provision of employment as part of a mixed use development at these sites could also help to reduce the need to travel and therefore reduce potential impacts. These issues will be a key consideration in the determination of where further employment land is located within the wider Garden Town Area.
- 5.14 The addition of Policy DES1 (Masterplanning) is positive in terms of biodiversity and green infrastructure as it requires all significant development proposals to prepare a Masterplan. This will help to ensure that biodiversity and green infrastructure are taken into consideration and planned for at an early stage.
- 5.15 It is noted that the main modification to Policy GA1 (The Gilston Area) includes proposing a key principle for development in the Gilston Area to enhance the natural environment, providing comprehensive green infrastructure network and net biodiversity gains.
- 5.16 The proposed Main Modifications were also screened as part of the Habitat Regulations Assessment (HRA) process also accompanying the Plan's preparation and found that implementation of the proposed Main Modifications would not alter the conclusions of the HRA Report [Exam ref: SUB/013] submitted alongside the District Plan in March 2017. It concluded that the Council is providing a sufficient framework to address identified issues in combination with neighbouring authorities via the cross boundary MoU<sup>9</sup> and the resulting refined modelling and mitigation strategies currently being developed.

### Appraisal of 'the submitted plan plus proposed modifications'

- 5.17 The SA Report [Exam ref: SUB/004] concluded in Paragraph 11.4.1:

*"The broad spatial approach to growth performs well from a biodiversity perspective. The most sensitive locations are avoided, the scale of growth at some locations reflects the need to 'work around' and integrate (within green infrastructure) biodiversity assets, and growth is also proposed where it has the potential to support the delivery of biodiversity enhancement initiatives (e.g. country park initiatives at Panshanger and north of Bishop's Stortford). On this basis, **significant negative effects are not predicted**. On a more local scale, there will be some significant negative effects, but also significant positive effects".*

- 5.18 This conclusion broadly still holds true for 'the submitted plan plus proposed modifications'.

## Climate change

### Appraisal of proposed modifications

- 5.19 Of the Main Modifications screened in for the purposes of SA, none are considered likely to result in any significant negative effects in relation to this SA topic. In terms of climate change adaptation, the Main Modifications propose additional employment land within two existing allocations so it is considered that there are no significant issues with regard to flood risk. It is noted that the proposed modification to Policy GA1 (The Gilston Area) includes a key principle for development relating to the use of energy-positive technology to ensure climate resilience.
- 5.20 In terms of climate change mitigation, the key issue relates to reducing per capita related CO<sub>2</sub> emissions from the built environment with per capita CO<sub>2</sub> emissions from transport considered separately under the 'Transport' topic. The delivery of additional employment land at two

<sup>9</sup> Memorandum of Understanding on managing the impacts of growth within the West Essex / East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation (draft September 2016)



existing allocations is unlikely to offer any substantial new opportunities to deliver decentralised heat/electricity supply (or standards of sustainable design/construction significantly above national requirements). This issue will also be a key consideration in the determination of where further employment land is located within the wider Garden Town Area.

### Appraisal of 'the submitted plan plus proposed modifications'

- 5.21 The SA Report [Exam ref: SUB/004] concluded in Paragraph 12.6.1 (mitigation) and 12.7.1 (adaptation):

*"The broad spatial approach to growth reflects a desire to support larger developments, where there will be the potential to fund and design-in low carbon and renewable energy schemes. The policy approach to ensuring that development demonstrates how carbon dioxide emissions will be minimised; that carbon reduction is met on-site and that existing materials are re-used and recycled in construction is supported. Given that new developments that are relatively 'low carbon' will often replace older buildings that do not perform well in this respect, it should be the case that carbon emissions from the built environment fall over time. Overall, although it is **not possible to conclude significant effects** on the baseline, the proposed approach performs well in terms of climate change mitigation objectives".*

*"The broad spatial approach to growth seeks to avoid development in areas at risk of flooding; however, it is inevitably the case that development on this scale can lead to increased run-off and hence increased flood risk, and it is the case that growth is allocated to towns (e.g. Hertford) that sit within river valleys. The majority of the site specific policies that relate to greenfield locations include a requirement for sustainable urban drainage and provision for flood mitigation. These policies will be implemented in line with WAT5 (Sustainable Drainage) which requires applications of the 'Sustainable Urban Drainage System (SUDS) hierarchy' and states that: "Development should aim to achieve Greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible." **Significant effects on the baseline are unlikely**".*

- 5.22 This conclusion broadly still holds true for 'the submitted plan plus proposed modifications'.

## Community and wellbeing

### Appraisal of proposed modifications

- 5.23 Of the Main Modifications screened in for the purposes of SA, the delivery of additional employment land during the life of the Plan through Policy DPS1 (Housing, Employment and Retail Growth) is generally positive in terms of communities as it will improve access to employment opportunities in those areas.
- 5.24 New Policy DES1 (Masterplanning) performs well as it will help to ensure that necessary community infrastructure is delivered to support significant development proposals. New policies relating to monitoring (DEL3 and DEL4) also perform positively as they provide a commitment to monitoring the delivery of housing and infrastructure to meet identified needs.
- 5.25 Policy GA1 (The Gilston Area) now seeks the delivery of the Gilston Area to include mechanisms for encouraging a successful and active community, including an innovative approach to create the conditions for local resident participation in the design and stewardship of their new communities.

### Appraisal of 'the submitted plan plus proposed modifications'

- 5.26 The SA Report [Exam ref: SUB/004] concluded in Paragraph 13.4.1:

*"The broad spatial approach to growth reflects a desire to avoid over developing those towns with limited capacity for town centre expansion. A desire to direct growth to locations with sufficient school capacity is another key driver of the spatial strategy. Furthermore, the spatial strategy reflects a desire to focus on larger developments that will support the parallel delivery of social infrastructure. In terms of the site specific policies and area-wide 'topic' policies, a suitably ambitious approach is proposed. For example, it is clear that the available evidence-base in relation to access to natural green space, open space and sports pitches has been*



*reflected. Overall, the proposals are likely to result in **significant positive effects** on the baseline”.*

5.27 This conclusion broadly still holds true for ‘the submitted plan plus proposed modifications’.

## Economy and employment

### Appraisal of proposed modifications

5.28 Of the Main Modifications screened in for the purposes of SA, the provision of an additional 9ha of employment land is the key consideration under this topic. The delivery of additional employment land will have a long term significant positive effect as it will help to ensure that the identified employment needs of the District and wider Functional Economic Market Area (FEMA) are met.<sup>10</sup>

### Appraisal of ‘the submitted plan plus proposed modifications’

5.29 The SA Report [Exam ref: SUB/004] concluded in Paragraph 14.4.1:

*“The broad spatial strategy reflects a desire to support the achievement of established economic objectives at Bishop’s Stortford and Harlow. Elsewhere, a more restrained approach is taken in-light of the objective to maintain the existing function of town centres. This is deemed to be a sound long term strategy. Overall, the proposed approach is likely to lead to **significant positive effects** on the baseline”.*

5.30 This conclusion broadly still holds true for ‘the submitted plan plus proposed modifications’.

## Historic environment

### Appraisal of proposed modifications

5.31 Of the Main Modifications screened in for the purposes of SA, the delivery of an additional 9 ha of employment land is the most relevant in terms of the historic environment. The delivery of an additional 5 ha of employment land in the Gilston Area and to the East of Welwyn Garden City does not change the proposed boundary of these sites. It is therefore considered unlikely that the inclusion of this additional employment development is likely to give rise to any impacts over-and-above those previously considered through the SA. New Policy DES1 (Masterplanning) may help to reduce potential impacts on the historic environment as it requires proponents of all significant development proposals to prepare a Masterplan setting out the quantum and distribution of land uses; access; sustainable high quality design and layout principles; necessary infrastructure; the relationship between the site and other adjacent and nearby land uses; landscape and heritage assets; and other relevant matters. This approach will also apply to future proposals within the wider Garden Town Area.

5.32 The designated heritage assets that are of particular significance and sensitivity within the Gilston Area are now more clearly set out within Policy GA1 (The Gilston Area). Furthermore, development is expected to ensure that these assets and their settings are conserved and, where appropriate, enhanced, through careful design; landscaping; open space; buffer zones; protection of key views; and, better management and interpretation of assets, where appropriate.

### Appraisal of ‘the submitted plan plus proposed modifications’

5.33 The SA Report [Exam ref: SUB/004] concluded in Paragraph 15.4.1:

*“The broad spatial strategy reflects a desire to avoid impacts to historic town centres; however, the decision to follow an ambitious growth strategy at Ware is perhaps not ideal in this respect. Uncertainties also surround the potential for growth in A414 and A1184 corridors to be delivered in such a way that avoids worsened traffic congestion in historic town centres. In terms of the site specific policies and area-wide ‘topic’ policies, it is thought that the proposed approach is suitably ambitious. A careful policy approach has been developed to guide development in the rural area, which should go some way to ensuring a proactive approach to management of*

<sup>10</sup> Hardisty Jones Associates (2017) West Essex and East Hertfordshire Assessment of Employment Needs.

<sup>10</sup> <https://www.eastherts.gov.uk/article/36040/Hearing-Sessions-Weeks-1-and-2>



assets. Overall, the proposed approach is **unlikely to lead to significant effects on the baseline**".

5.34 This conclusion broadly still holds true for 'the submitted plan plus proposed modifications'.

## Housing

### Appraisal of proposed modifications

5.35 The two new policies (DEL3 and DEL4) relating to monitoring are of particular relevance to this topic. They relate to the monitoring of housing delivery within the District (Policy DEL3) and the Gilston Area (DEL4) in particular, proposing a number of measures to bring forward development and address any shortfalls. This is positive for this topic in terms of helping to ensure needs are met throughout the life of the Plan.

### Appraisal of 'the submitted plan plus proposed modifications'

5.36 The SA Report [Exam ref: SUB/004] concluded in Paragraph 16.4.1:

*"The broad spatial strategy is driven by the priority of ensuring housing supply in the long term by ensuring that sufficient housing land is allocated. Various area-wide 'topic' policies are in place to ensure that development is 'mixed' in terms of type and tenure, with a view to ensuring delivery of affordable housing and ensuring that other specialist housing needs are met. The proposed approach should lead to **significant positive effects**".*

5.37 This conclusion broadly still holds true for 'the submitted plan plus proposed modifications'.

## Land

### Appraisal of proposed modifications

5.38 None of the Main Modifications screened into the SA are likely to have a significant effect in relation to this topic. The delivery of an additional 9 ha of employment land will be within two existing allocations so will not result in the loss of any additional greenfield or agricultural land. This issue will be a key consideration in the determination of where further employment land is located within the wider Garden Town.

### Appraisal of 'the submitted plan plus proposed modifications'

5.39 The SA Report [Exam ref: SUB/004] concluded in Paragraph 17.4.1:

*"There is a focus on development on greenfield land given the lack of available brownfield sites. This approach is necessitated on account of the housing need that exists within the various housing market areas. 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'. While it is clear that brownfield land has been prioritised where possible and that quality of agricultural land has been taken into account through the Supporting Document, it is still suggested that **significant negative effects** are likely in terms of the overall loss of greenfield and agricultural land".*

5.40 This conclusion broadly still holds true for the 'the submitted plan plus proposed modifications'.

## Landscape

### Appraisal of proposed modifications

5.41 Of the Main Modifications screened in for the purposes of SA, the delivery of an additional 9 ha of employment land is the most relevant in terms of this topic. It is important to note that the delivery of an additional 5 ha of employment land in the Gilston Area, and to the East of Welwyn Garden City does not change the proposed boundary of these allocations. It is therefore considered unlikely that the inclusion of this employment development within these sites is likely result in any impacts over-and-above those previously considered through the SA. New Policy DES1 (Masterplanning) will help to reduce potential impacts on the landscape as it requires proponents of all significant development proposals to prepare a Masterplan setting



out the quantum and distribution of land uses; access; sustainable high quality design and layout principles; necessary infrastructure; the relationship between the site and other adjacent and nearby land uses; landscape and heritage assets; and other relevant matters. This approach will also apply to future proposals within the wider Garden Town Area.

### Appraisal of 'the submitted plan plus proposed modifications'

5.42 The SA Report [Exam ref: SUB/004] concluded in Paragraph 18.4.1:

*"While topic and site allocation policies include measures to reduce the potential impacts of development on the landscape, it is considered that there is still the potential for a residual **significant negative effect**. This is particularly as a result of development at Gilston as well as the cumulative effect of all the development proposed in the South of the District. It is recognised that the strategy focusses development in the south of the District in the most sustainable locations, which helps to protect the rural landscape character in the north. However, this does not negate the potential significant effects in the south of the District. This also results in the loss of Green Belt land to the south. In terms of the approach to site specific and area-wide 'topic' policy, the proposed approach is adequate".*

5.43 This conclusion broadly still holds true for 'the submitted plan plus proposed modifications'.

## Transport

### Appraisal of proposed modifications

5.44 The delivery of an additional 9 ha of employment land during the life of the Plan, 5 ha in the Gilston Area, to the East of Welwyn Garden City and within the wider Garden Town area has the potential to increase pressure on the local highway network in those areas. There has been extensive traffic modelling undertaken to understand the impacts of development across the HMA as well as at the District level on the highway network and identify the transport infrastructure necessary to support development. A signed Memorandum of Understanding (Feb 2017) has been produced, which identifies a number of new infrastructure interventions that will be necessary. The most notable of these is a proposed new motorway junction on the M11 (Junction 7A).

5.45 Taking the findings of the transport modelling into account as well as the transport infrastructure to be delivered through the signed MoU, it is considered unlikely that the additional employment growth proposed would result in a significant negative effect, particularly if it is delivered as part of a high quality mixed-use development. The employment land delivered in the Gilston Area, to the East of Welwyn Garden City and within the wider Garden Town Area will improve access to employment opportunities and therefore potentially reduce commuting. Delivered alongside housing, community infrastructure and sustainable transport modes, there is the potential to reduce reliance on the private vehicle as well as the need to travel in the first instance.

5.46 It is noted that the main modification to Policy GA1 (The Gilston Area) proposes the inclusion of a key principle for development relating to integrated and accessible sustainable transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

### Appraisal of 'the submitted plan plus proposed modifications'

5.47 The SA Report [Exam ref: SUB/004] concluded in Paragraph 19.4.1:

*"One of the driving 'principles' of the development strategy is: "To promote self-containment by directing development to areas where there is reasonable proximity to services and facilities, and which reflect existing travel to work areas, school catchments, and retail spend patterns and functional geographies." In this respect, the broad spatial strategy performs well in the sense that: the approach that seeks to maximise opportunities at Bishop's Stortford (where there is the potential for employment growth and town centre expansion); and growth is limited at Sawbridgeworth (a 'dormitory' settlement). Growth at Hertford and Ware may not support 'self-containment', but it is noted that these settlements have good access to the rail network. Allocations East of Welwyn Garden City, in the Gilston Area and East of Stevenage are set to be well connected to adjacent towns by public transport and walking/cycling; and, importantly, a restrained approach to growth is set to be taken at Buntingford, where car dependency is*



*entrenched. Overall, the proposed site allocations are unlikely to lead to significant negative effects (given site specific and area-wide 'topic' policies). Taking into account the evidence and larger strategic allocations, **negative effects** are **possible but uncertain**".*

5.48 This conclusion broadly still holds true for 'the submitted plan plus proposed modifications'.

## Water

### Appraisal of proposed modifications

5.49 None of the Main Modifications screened in for the purposes of the SA are likely to have a significant effect under this topic. There is no evidence to suggest that this increased growth could not be accommodated in terms of water resources and the capacity of wastewater treatment works.

### Appraisal of 'the submitted plan plus proposed modifications'

5.50 The SA Report [Exam ref: SUB/004] concluded in Paragraph 20.4.1:

*"Waste water infrastructure capacity has been given careful consideration over the course of plan-making. The outcome is confidence in that there will be no 'show-stoppers', i.e. infrastructure constraints that cannot be overcome, or would be expensive to address and hence draw on funding needed elsewhere (e.g. for community infrastructure). In terms of water efficiency and the potential for water quality impacts associated with surface water run-off, it would appear that a suitably ambitious policy approach is proposed, i.e. an approach that ensures that applicants go beyond national requirements".*

5.51 This conclusion broadly still holds true for 'the submitted plan plus proposed modifications'.



## 6. Next steps and monitoring

### Plan finalisation

- 6.1 This Chapter explains the next steps in the plan-making/SA process.
- 6.2 Following the current consultation, the Inspector will consider all representations received, before deciding whether to report on the Plan's soundness (with modifications as necessary), or resume examination hearings.
- 6.3 Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

### Monitoring

- 6.4 The SA Report submitted alongside the District Plan presented a range of 'measures envisaged concerning monitoring' in Chapter 25. The work carried out in relation to the proposed modifications does not necessitate any significant amendments to the proposed measures at this stage. A final list of monitoring measures will be presented within the SA Statement produced once the District Plan is adopted.



# Appendix I: Screening or proposed Main Modifications

**Table A: Screening the Main Modifications for the purposes of SA**

Main Mod. Ref	Focus (changes in relation to...)	Screened into SA	Rationale
MM/3/01-MM/3/07	<b>Policy DPS1 (Housing, Employment and Retail Growth)</b> Changes to the supporting text and policy to reflect updated housing and employment need figures.	Yes	The policy has been amended to reflect updated housing and employment figures. The overall level of housing growth to be delivered during the life of the Plan has not significantly changed. There are no new site allocations proposed and the majority of the increased housing growth is as a result of an increase to the windfall allowance as well as the number of completions and commitments to reflect updated evidence. These changes to the housing numbers are not significant in terms of the SA. They do not necessitate further consideration of alternatives (Part 2 of the SA Report) or affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004]. However, the amount of employment land to be delivered during the life of the Plan has almost doubled from 10-11 to 19-20 hectares for B1/BS/B8 <sup>11</sup> uses. This is a significant change and should be considered in further detail through the SA.
MM/3/08-MM/3/14	<b>Policy DPS2 (Development Strategy 2011-2033)</b> Changes to the supporting text and policy in response to issue raised by Inspector at Part 1 Hearing Sessions.	No	While there have been a number of changes to the policy these were mainly done to provide further clarity. There have been no significant changes to the preferred development strategy; therefore, the amendments do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/3/15-MM/3/19	<b>Policy DPS3 (Housing Land Supply 2011-2033)</b> Changes to the supporting text and policy to reflect updated housing figures.	No	The policy has been amended to reflect updated evidence. This includes greater windfall allowance as well as an increased number of completions and commitments. In line with emerging proposals at The Goods Yard (Bishop's Stortford) site the number of dwellings has risen from 400 to 600 during the life of the Plan. These changes do not significantly affect the findings of the appraisal of alternatives presented in Part 2 or the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/3/20-MM/3/21	<b>Policy DPS4 (Infrastructure Requirements)</b> Changes to policy to reflect issues raised by HCC and the Inspector.	No	Policy amended to provide more clarity around the infrastructure improvements to address constraints on the A414 as well as a reference to measures that facilitate sustainable transport. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/3/22	<b>Policy DPS5 (Review of the District Plan)</b> Deletion of supporting text and policy.	No	The Council is now proposing to meet the updated housing needs in full so the supporting text and policy are no longer relevant. The removal of this policy does not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].

<sup>11</sup> B1 is office, B2 is general industrial and B8 is storage and distribution.  
[https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)



Main Mod. Ref	Focus (changes in relation to...)	Screened into SA	Rationale
MM/4/01-03	<b>Policy GBR1 (Green Belt)</b> Changes to the supporting text and policy in response to issue raised by Inspector.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/4/04-07	<b>Policy GBR2 (Rural Area Beyond the Green Belt)</b> Changes to the supporting text and policy in response to issue raised by Inspector.	No	As above.
MM/5/01-02	<b>Chapter 5 Bishop's Stortford</b> New introductory text and key diagram.	No	Changes provide further clarity with regard to Masterplanning and reflect amendments to the policies below. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/5/03	<b>Policy BISH1 (Development in Bishop's Stortford)</b> Changes to policy to reflect updated evidence/housing numbers.	No	Amendments include an increase in the overall level of development for the settlement from 4,142 to 4,426 new homes. In terms of housing sites, changes include an increase in the number of new homes to be delivered at the Reserve Secondary School Site (from up to 163 to at least 247 dwellings) and at The Goods Yard (from 400 to 600 dwellings). The policy now includes reference to the delivery of employment as per Policy BISH3. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/5/04	<b>Policy BISH2 (Bishop's Stortford Town Centre Planning Framework)</b> Minor changes to policy wording.	No	Minor changes that do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/5/05	<b>Policy BISH3 (Bishop's Stortford North)</b> Minor changes to policy wording.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004]. The delivery of additional employment is considered through Policy BISH1.
MM/5/06-07	<b>Policy BISH4 (Reserve Secondary School Site, Hadham Road)</b> Changes to supporting text and policy to reflect the latest position with regards to the approved appeals on the site and the delivery of a secondary school being secured through the Bishop's Stortford North development.	No	Amendments to the policy to reflect outline planning permission that has recently been granted. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/5/08	<b>Policy BISH5 (Bishop's Stortford South)</b> Changes include minor changes to policy criteria.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/5/09-10	<b>Policy BISH6 (The Bishop's Stortford High School Site, London Road)</b> Changes to supporting text and policy to reflect the latest understanding with regards to the delivery of new homes linked to the availability and completion of a new school at Bishop's Stortford South	No	As above.



Main Mod. Ref	Focus (changes in relation to...)	Screened into SA	Rationale
	and provide further clarity on Masterplanning.		
MM/5/11	<b>Policy BISH7 (The Goods Yard)</b> Changes include minor amendments to policy criteria and updated housing number from 400 to 600 dwellings.	No	The increase in the number of new homes to be delivered from 400 to 600 reflects emerging applications and discussions with developers. This change does not significantly affect the findings of the Site Options Appraisal (Appendix III) or appraisal of the Draft Plan (Part 2) presented in the SA Report [Exam ref: SUB/004].
MM/5/12	<b>Policy BISH8 (The Causeway/Old River Lane)</b> Minor changes to the policy wording.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/5/13	<b>Policy BISH9 (East of Manor Links)</b> Minor changes to the policy wording.	No	As above.
MM/5/14	<b>Policy BISH10 (The Mill Site)</b> Changes to the policy to ensure that ongoing commercial interests are maintained should part of the site come forward independently.	No	As above.
MM/5/15	<b>Policy BISH11 (Employment in Bishop's Stortford)</b> Changes to the supporting text for clarity.	No	As above.
MM/6/01-05	<b>Chapter 6 Buntingford</b> Changes to introductory text and key diagram.	No	As above.
MM/6/06	<b>Policy BUNT1 (Development in Buntingford)</b> Changes to the policy to reflect updated housing numbers. Site allocations also now included within policy BUNT1.	No	These changes provide further clarity, which includes setting out the current commitments at this settlement that are contributing to housing supply. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/6/07-13	<b>Policy BUNT2 (First School Site Allocation)</b> Changes to the supporting text to reflect the preferences of the County Council for the first school site.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/6/14-16	<b>Policy BUNT3 (Employment in Buntingford)</b> Minor changes to the supporting text.	No	As above.
MM/7/01-02	<b>Chapter 7 Hertford</b> Changes to introductory text and key diagram to reflect provide further clarity on Masterplanning and reflect the current position in respect of the Local Transport Plan process.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/7/03	<b>Policy HERT1 (Development in Hertford)</b> Changes to policy include alterations to criteria regarding housing, employment and retail	No	The delivery of retail floorspace within the town centre and 3,000 sq.m of B1 employment floorspace in the Mead Lane Area (HERT2) is not a new addition to the Plan. The inclusion of them within Policy HERT1 is just to provide further clarity



Main Mod. Ref	Focus (changes in relation to...)	Screened into SA	Rationale
	delivery. Modifications reflect updated housing number as a result of updated evidence.		in terms of the overall level of development proposed in Hertford. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/7/04-05	<b>Policy HERT2 (Mead Lane Area)</b> Minor change to supporting text and changes to policy to provide further clarity.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004]. New criterion (n) helps to strengthen the policy through seeking that development will protect or, where appropriate, enhance heritage assets and their settings.
MM/7/06-08	<b>Policy HERT3 (West of Hertford)</b> Minor changes to supporting text and policy as well as extension of site boundary by 0.66ha.	No	The small extension of the site seeks to facilitate sustainable transport opportunities (that would result from provision of linkages through to the existing Sele Farm developed area); allow for the accommodation of an infiltration basin; and, provide a more robust Green Belt boundary in line with existing distinguishable features. These changes do not significantly affect the findings of the Site Options Appraisal (Appendix III) or appraisal of the Draft Plan (Part 2) presented in the SA Report [Exam ref: SUB/004].
MM/7/09-11	<b>Policy HERT4 (North of Hertford)</b> Minor changes to supporting text and policy.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/7/12-13	<b>Policy HERT5 (Land to the South of Hertford)</b> Minor changes to supporting text and policy.	No	As above.
MM/7/14-15	<b>Policy HERT6 (Employment in Hertford)</b> Minor changes to supporting text and policy.	No	As above.
MM/7/16-17	<b>Policy HERT7 (Hertford Town Centre Urban Design Strategy)</b> Minor changes to supporting text and policy.	No	As above.
MM/8/01	<b>Chapter 8 Sawbridgeworth</b> Additional introductory text to provide clarity around Masterplanning.	No	As above.
MM/8/02-03	<b>Policy SAWB1 (Development in Sawbridgeworth)</b> Changes to key diagram (to reflect the position agreed with site promoter) and the policy to improve clarity.	No	The amendments seek to provide further clarity, in terms of the direction of any new retail and employment development. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/8/04-06	<b>Policy SAWB2 (Land to the North of West Road)</b> Changes to supporting text and policy to improve clarity around Masterplanning.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/8/07-10	<b>Policy SAWB3 (Land to the South of West Road)</b> Changes to supporting text and policy.	No	References to the provision of greenspace/GI as part of any proposal for development at this site have been removed. Any proposal would still need to conform to Policy NE4 (Green Infrastructure); therefore, these changes do not significantly affect the findings of the appraisal of the Draft Plan



Main Mod. Ref	Focus (changes in relation to...)	Screened into SA	Rationale
			presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/8/11-12	<b>Policy SAWB4 (Land to the North of Sawbridgeworth)</b> Changes to supporting text and policy to improve clarity around Masterplanning.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/8/13	<b>Policy SAWB5 (Sports Pitch Provision)</b> Allocation deleted as the Council cannot be assured that the site can be delivered as a sports pitch.	No	The policy has been deleted as the Council cannot be assured that the site can be delivered as a sports pitch. The deletion of this policy does not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004]. Any proposals coming forward will be expected to be in line with Policy CFFR1 (Open Space, Sport and Recreation) and provide open space, indoor and outdoor sport and recreation facilities. This is reiterated through individual allocation policies within the Plan.
MM/9/01	<b>Chapter 9 Ware</b> Changes to introductory text.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/9/02-03	<b>Policy WARE 1 (Development in Ware)</b> Changes to policy to provide further clarity about proposed development in Ware as well as changes to key diagram.	No	The amendments to the policy seek to provide further clarity in terms of the overall level of development proposed in Ware. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/9/04-05	<b>Policy WARE2 (North and East of Ware)</b> Changes to supporting text and policy to provide more clarity, particularly around the delivery of infrastructure.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/10/01-12	<b>Chapter 10 (Villages)</b> Changes to the introductory text to improve clarity and reflect issues raised by the Inspector.	No	Villages with GB boundaries were previously excluded from this policy. The Inspector asked for them to be included and given an indicative housing number to provide further clarity in terms of growth during the life of the Plan. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/10/13	<b>Policy VILL1 (Group 1 Villages)</b> Minor changes to policy text.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/10/14-15	<b>Policy VILL2 (Group 2 Villages)</b> Changes to the supporting text and policy.	No	As above.
MM/10/16-17	<b>Policy VILL3 (Group 3 Villages)</b> Changes to the supporting text and policy. Deletion of wording regarding development in the Green Belt and Rural Area Beyond the Green Belt.	No	As above.
MM/10/18-21	<b>Policy VILL4 (Neighbourhood Plans)</b> Deletion of supporting text and policy.	No	Information on Neighbourhood Plans has been moved to the beginning of the Chapter and Policy VILL4 (Neighbourhood Plans) removed. This is not significant in terms of the SA as the Plan still seeks to monitor the progress of Neighbourhood Plans, which will help the Council to determine if it is



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			necessary to identify sites for development through the Site Allocations Development Plan Document. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/11/01-07	<b>Chapter 11 The Gilston Area</b> Changes to introductory text to provide further clarity, reflect updated evidence and respond to issues raised by the Inspector.	No	These changes do not constitute a change in policy thrust.
MM/11/08	<b>Policy GA1 (The Gilston Garden Area)</b> Changes to the policy to reflect issues raised by the Inspector and other stakeholders as well as reflect the work that is now taking place in relation to the Harlow and Gilston Garden Town.	Yes	There have been a number of changes to this policy. The majority seek to provide further clarity around the total level of growth to be delivered during and after the plan period in the Gilston area as well as the key principles for development. The policy now includes the requirement for the delivery of an employment area of around 5 ha.
MM/11/09-12	<b>Policy GA2 (The River Stort)</b> Changes to the supporting text and policy.	No	The changes seek to provide further clarification and respond to issue raised by Historic England. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/12/01-04	<b>Policy EOS1 (East of Stevenage)</b> Changes to the supporting text and policy to provide further clarification as well as changes to the key diagram.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/13/01-02	<b>Policy EWEL1 (Land East of Welwyn Garden City)</b> Minor changes to the policy to provide further clarification and agreed position with Historic England.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/14/01-02	<b>Policy HOU1 (Type and Mix of Housing).</b> Minor changes to supporting text and policy.	No	As above.
MM/14/03-06	<b>Policy HOU3 (Affordable Housing)</b> Changes to the supporting text to reflect updated evidence.	No	As above.
MM/14/07	<b>Policy HOU8 (Self-Build Housing)</b> Change to policy.	No	The percentage of dwelling plots for sale to self-builders has now been reduced from 5% to 1%. The reduction won't affect the delivery of housing and the Plan still seeks to ensure that the needs of self-builders are being met. This change does not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/14/08	<b>Policy HOU9 (Gypsies and Travellers and Travelling Showpeople)</b> Minor changes to the policy.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/14/09	<b>Policy HOU10 (New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople)</b>	No	As above.



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	Minor change to policy.		
MM/14/10	<b>Section 14.12 (Replacement Buildings in the Green Belt and the Rural Area Beyond the Green Belt)</b> Deleted as no longer required following modifications to Policy GBR2.	No	As above.
MM/14/11	<b>Policy HOU11 (Extensions and Alterations to Dwellings, Residential Outbuildings and Works Within Residential Curtilages)</b> Cross reference to GBR1 and GBR2 removed.	No	As above.
MM/15/01	<b>Policy ED1 (Employment)</b> Minor changes to supporting text and policy. Relatively minor changes in relation to the provisions of the General Permitted Development (England) Order 2015 (as amended).	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/16/01	<b>Policy RTC5 (District Centres, Neighbourhood Centres, Local Parades and Individual Shops)</b> Minor changes to policy.	No	As above.
MM/17/01-02	<b>New Policy DES1 (Masterplanning)</b>	Yes	New policy to provide greater clarity around Masterplanning. Should be considered through the SA.
MM/17/03	<b>Policy DES1 (Landscape Character) (renumbered DES2)</b> Changes to policy in order to provide further clarity.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/17/04	<b>Policy DES2 (Landscaping) (renumbered DES3)</b> Changes to policy to provide further clarity around mitigation.	No	As above.
MM/17/05	<b>Policy DES3 (Design of Development) (renumbered DES4)</b> Minor change to policy requiring the appropriate provision of high speed broadband connectivity.	No	As above.
MM/18/01-02	<b>Policy TRA1 (Sustainable Transport)</b> Changes to supporting text and policy.	No	Amendments to policy in response to issues raised by HCC on wider air quality issues and health benefits of sustainable travel. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/18/03	<b>Policy TRA3 (Vehicle Parking Provision)</b> Minor changes to policy.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/19/01	<b>Policy CFLR1 (Open Space, Sport and Recreation)</b> Minor changes to policy.	No	As above.
MM/19/02	<b>Policy CFLR2 (Local Green</b>	No	As above.



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	<b>Space)</b> Minor changes to policy.		
MM/19/03	<b>Policy CFLR4 (Water Based Recreation)</b> Minor changes to policy.	No	As above.
MM/19/04	<b>Policy CFLR6 (Equine Development)</b> Minor changes to policy.	No	As above.
MM/19/05-06	<b>Policy CFLR7 (Community Facilities)</b> Changes to supporting text and policy.	No	As above.
MM/20/01	<b>Policy NE1 (International, National and Locally Designated Nature Conservation Sites)</b> Changes to policy to provide further clarification.	No	As above.
MM/20/02	<b>Policy NE2 (Sites of Nature Conservation Interest (Non-Designated))</b> Changes to policy to provide further clarification.	No	As above.
MM/20/03	<b>Policy NE3 (Species and Habitats)</b> Changes to policy to provide further clarification.	No	As above.
MM/21/01	<b>Policy HA1 (Designated Heritage Assets)</b> Changes to provide further clarity.	No	As above.
MM/21/02	<b>Policy HA4 (Conservation Areas)</b> Minor changes to policy.	No	As above.
MM/21/03	<b>Policy HA5 (Listed Buildings)</b> Minor changes to policy.	No	As above.
MM/21/04	<b>Policy HA8 (Historic Parks and Gardens)</b> Minor changes to policy.	No	As above.
MM/21/05	<b>Policy HA9 (Enabling Development)</b> Policy amended so that is in line with Historic England's latest guidance.	No	As above.
MM/22/01	<b>Policy CC2 (Climate Change Mitigation)</b> Minor changes to policy.	No	As above.
MM/23/01	<b>Policy WAT3 (Water Quality and the Water Environment)</b> Minor changes to policy.	No	As above.
MM/23/02	<b>Policy WAT6 (Wastewater Infrastructure)</b> Minor changes to policy.	No	As above.
MM/24/01	<b>Policy EQ4 (Air Quality)</b> Policy has been reworded in consultation with Environmental	No	While there have been a significant number of changes the overall thrust of the policy remains the same. It seeks to minimise impacts on air quality



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	Health.		and sets out mitigation measures. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/24/02-03	<b>New Sections 24.6 Waste and Recycling and 24.7 Minerals</b> Additional supporting text included at the request of HCC.	No	The additional text provides further clarification in relation to the Hertfordshire Waste Local Plan and the Minerals Local Plan. These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/25/01-02	<b>Policy DEL1 (Infrastructure and Service Delivery)</b> Changes to the supporting text and policy.	No	These changes do not significantly affect the findings of the appraisal of the Draft Plan presented in Part 2 of the SA Report [Exam ref: SUB/004].
MM/25/03-04	<b>New Policy DEL3 (Monitoring Framework)</b>	Yes	New policy that sets out measures to bring forward development if targets aren't being met.
MM/25/05-06	<b>New Policy DEL4 (Monitoring of the Gilston Area)</b>	Yes	New policy that commits the Council to monitoring the delivery of new housing in the Gilston Area.



