

ESSENTIAL REFERENCE PAPER 'H': CHAPTER 2 - KEY ISSUES AND VISION

Question 3: Theme 1 LDF Strategic Objectives (Energy and Climate Change) **Have we got the LDF Strategic Objectives for Theme 1 correct?**

59 people/organisations provided comments in relation to Question 3. These included:

- 23 Individuals
- 11 Developers/landowners/agents/businesses
- 15 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - East Herts Council – Environmental Health Team
 - Environment Agency
 - Epping Forest District Council
 - Essex County Council – Environment, Sustainability & Highways
 - Harlow District Council
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council – Environment
 - Herts & Middlesex Wildlife Trust
 - Lee Valley Regional Park Authority
 - Natural England
 - Rivers Nursery Site & Orchard Group
 - Stansted Airport Ltd
 - Transition Hertford
- 10 Town and Parish Councils including:
 - Aston
 - Brickendon Liberty
 - Buntingford
 - Cottered
 - Hertford
 - High Wych
 - Stanstead Abbots
 - Thorley
 - Walkern
 - Watton-at-Stone

Q3 - Summary Comment	Q3 - Detailed Comment
Community energy	<ul style="list-style-type: none"> • Emphasise local production of energy • Community-run energy
Air Quality	<ul style="list-style-type: none"> • Link climate change and air quality/pollution together. E.g. potential air pollution problems from too many biomass boilers. Mention Air Quality Management Areas; Establish air quality monitoring targets • Do not use incineration to generate energy
Specific technologies	<ul style="list-style-type: none"> • Visual intrusion of wind turbines • No evidence to say that wind turbines are productive • Waste recycling • Solar Panels • Anaerobic digestion can contribute significantly to carbon reduction targets, if biogas produced can be converted to electricity and heat via a CHP plant. • Biogas is inefficient if full use is not made of the waste heat • To avoid vehicle emissions biogas projects should not be located in rural areas. • Amend ECC1 as follows: 'encourage the use of renewable energy and energy from waste sources'
Other climate change mitigation issues	<ul style="list-style-type: none"> • Energy conservation has a profound spatial and design aspect, including location of centres e.g. Welwyn Garden City. • Energy conservation before energy generation • Funding incentives for green energy; off-set fund for retro-fitting. • Carbon reduction/energy generation targets should recognise that this varies from site to site • Need to consider the practicality and viability of technologies such as neighbourhood or district heat networks • Consider mapping opportunities for decentralised energy • Need to monitor district carbon emissions on an annual basis • Core Strategy needs a carbon reduction strategy; • Improve energy efficiency of current housing stock • Sustainable construction materials/natural products
Food	<ul style="list-style-type: none"> • Secure and sustainable local food supply • Do not take agricultural land out of use to produce energy crops
Water	<ul style="list-style-type: none"> • Need for sustainable drainage – potential flooding • Need greater investment in water infrastructure; need to increase water supplies • Concerns about water quality – pollution and impact on wildlife sites. • Impact of capacity constraints at Rye Meads • ECC2 should include rain water harvesting and grey water systems in all new development • Do not 'avoid' development in the flood plain, but should be appropriately assessed in line with PPS25
Role of green spaces	<ul style="list-style-type: none"> • Gilston Great Park • Lee Valley Regional Park has an important role to play in mitigating the impacts of climate change • Create linkages between fragmented areas of biodiversity value • Preserve Hertford's green fingers • Allotments
Other adaptation issues	<ul style="list-style-type: none"> • Core Strategy needs a climate change adaptation strategy • Improved cycling facilities
General	<ul style="list-style-type: none"> • Objectives need to be more specific and defined. • Wording of Strategic objective should be stronger
Travel and location of	<ul style="list-style-type: none"> • Still need to provide for cars/car parking. Electric cars? • Location of development - Local employment and public transport will alleviate the

Q3 - Summary Comment	Q3 - Detailed Comment
development	need for travel.
	<ul style="list-style-type: none"> • Does not mention home working or working at local employment hubs
	<ul style="list-style-type: none"> • Reduce emissions by locating growth where non-car access is possible, such as in urban extensions

Comments received in respect of Q3 relating to other issues in Chapter 2

Q3 - Summary Comment	Q3 - Detailed Comment
Themes	<ul style="list-style-type: none"> • All Strategic objectives need to address context, such as cross-boundary issues and LSCP corridor

Comments received in respect of Q3 relating to other Chapters

Chapter 3: Development Strategy

Q3 - Summary Comment	Q3 - Detailed Comment
Development Strategy	<ul style="list-style-type: none"> • No need for more houses; no garden grabbing
	<ul style="list-style-type: none"> • Growth options will undermine climate change objectives

Question 4: Theme 1 Policy Options (Energy and Climate Change)

Is our approach to dealing with the policy options for Theme 1 correct?

45 people/organisations provided comments in relation to Question 4. These included:

- 20 Individuals
- 5 Developers/landowners/agents/businesses
- 11 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Environment Agency
 - Epping Forest District Council
 - Hertford Civic Society
 - Hertfordshire Biological Records Centre
 - Herts & Middlesex Wildlife Trust
 - Natural England
 - Thames Water Property Services
 - The Ware Society
 - The Woodland Trust
 - Transition Hertford
- 9 Town and Parish Councils:
 - Aston
 - Braughing
 - Brickendon Liberty
 - Cottered
 - Hertford Town
 - High Wych
 - Stanstead Abbots
 - Thorley
 - Walkern

Q4 - Summary Comment	Q4 - Detailed Comments
Anaerobic digestion/ biogas	<ul style="list-style-type: none"> Anaerobic digestion should not be included if only one of the outputs is used i.e. electricity. Heat and ideally CO₂ should also be used.
	<ul style="list-style-type: none"> Biogas projects are a threat to beautiful natural environment: increased traffic; pressure to build new houses adjacent to use waste heat; eyesore. As an alternative, projects could be built near the National Gas grid and the biogas cleaned and piped into it, avoiding the need for new houses completely.
Targets	<ul style="list-style-type: none"> Carbon emission targets for new and existing housing. Onsite savings and offsite contributions – see Islington’s Core Strategy and Development Management policies
	<ul style="list-style-type: none"> Need more assertive strategy, not just ‘guidelines’ and ‘targets’
	<ul style="list-style-type: none"> Need specific policy support for renewable energy generation, specifically energy from waste
	<ul style="list-style-type: none"> Introduce tough housing standards including: zero carbon, lifetime homes, passivhaus, retrofitting. Cannot wait for 2016
	<ul style="list-style-type: none"> Need specific targets for transport emissions
	<ul style="list-style-type: none"> Focus on transport initiatives
	<ul style="list-style-type: none"> Need clear policies in favour of renewable energy projects e.g. wind
	<ul style="list-style-type: none"> Carbon reduction/energy generation targets should recognise that this varies from site to site Need to consider the practicality and viability of technologies such as neighbourhood or district heat networks
Other mitigation measures	<ul style="list-style-type: none"> Edmonton-style burner is required in East Herts but where should it be located? – brownfield sites
	<ul style="list-style-type: none"> Reduce street lighting to save CO₂, reduce light pollution and reduce costs.
	<ul style="list-style-type: none"> Need measures to limit pollution from roads, railways and airports
Guidance	<ul style="list-style-type: none"> Needs specific guidance in the Core Strategy on what is expected – otherwise, how will you determine what development proposals are in line with the plan?
	<ul style="list-style-type: none"> Do not repeat national guidance
Development Strategy	<ul style="list-style-type: none"> Stanstead Abbots lies in a flood risk area
	<ul style="list-style-type: none"> Capacity constraints at Rye Meads
	<ul style="list-style-type: none"> Strategic cross-boundary drainage issues
	<ul style="list-style-type: none"> Locating development in villages with few facilities will increase car use
	<ul style="list-style-type: none"> Conflict between growth and climate change objectives
	<ul style="list-style-type: none"> Extend Green Belt to the north to protect countryside
Climate change adaptation	<ul style="list-style-type: none"> Net environmental footprint – negative impact of development
	<ul style="list-style-type: none"> ‘Peak oil’
	<ul style="list-style-type: none"> Do not sacrifice Greenfield land to developers – vital for food security
	<ul style="list-style-type: none"> Green Infrastructure networks vital for climate change adaptation
	<ul style="list-style-type: none"> Water efficiency
General	<ul style="list-style-type: none"> Tree planting and coppicing for CHP wood fuel – biodiversity benefits of this.

Question 5: Theme 2 LDF Strategic Objectives (People and Community Safety)
Have we got the LDF strategic objectives for Theme 2 correct?

32 people/organisations provided comments in relation to Question 5. These included:

- 14 Individuals
- 4 Developers/landowners/agents/businesses
- 5 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - Epping Forest District Council
 - Hertfordshire Constabulary
 - Jehovah's Witnesses
- 9 Town and Parish Councils including:
 - Aston
 - Braughing
 - Buntingford
 - Hertford Town
 - High Wych
 - Stanstead Abbots
 - Thorley
 - Walkern
 - Watton-at-Stone

Q5 - Summary Comment	Q5 - Detailed Comment
Strategic Objectives - General	<ul style="list-style-type: none"> • Support/ broadly correct • Need wise objectives • Would like to see objectives which take clear learnings from rural settlements and the good things about them, and apply these to developing our towns in a new way. • These aims should be achieved from within the existing population and expected internally generated growth. • Objectives are in no way realised by fact. • This subject should be one of planning issues, not glib statements and plans. • Objectives are what one would expect to find, but they are too general and sometimes in contention.
PCS1	<ul style="list-style-type: none"> • Support • Goes beyond the controls of the planning system. It is not the duty of the LPA to reduce 'the fear of crime across the district'. This reference should be removed from PCS1. • Objective is consistent with the Government's approach to delivering sustainable development and social cohesion and inclusion set out in PPS1. • Objective should acknowledge and value the lower crime rate in villages and rural areas and seek to protect these havens of safety and community from future development.
Crime	<ul style="list-style-type: none"> • East Herts planning department needs to take into account the 'Design for Safety Standards' as produced by the Crime Prevention police architect otherwise the vision statements are worthless. (Not being enforced at Barratt's development, Buntingford) • See 'Local Sustainable Housing' by Chris Bird for inclusive build designs which reduce anti-social behaviour. • Anti-social behaviour can be combated in rural areas by housing allocation vetting. • Are your crime statistics really correct?
PCS2	<ul style="list-style-type: none"> • More emphasis on existing stakeholders within communities to determine how integration best occurs. • See 'Local Sustainable Housing' by Chris Bird for inclusive build designs which promote community cohesion. • Concern over the integration of new development can be avoided or risk minimised through early consultation and engagement with the LPA, the local community and stakeholders so that the opportunity is provided for comments to be made. • Try to ensure that any new development is integrated with the existing community. • Electronic networking would help to increase involvement and interworking among communities.
PCS3	<ul style="list-style-type: none"> • Development Control processes will need to be drastically overhauled if this objective is to be satisfied. • The Council pays little attention to local views eg. Barratt development at Buntingford shows non-conformity with this objective • Communication and partnership working will need to involve the Police in the design, development and management of places. • We welcome the fact that EHC is taking account of parish plans in understanding the issues facing East Herts.
PCS4	<ul style="list-style-type: none"> • Requires the provision of extra community facilities not only to keep pace with expanding population but also to catch up with it. • Hertfordshire is woefully lacking in D1 community facilities due to the loss of D1 designated sites. • Current policies state that it will be protected but it is constantly lost to residential development.

Q5 - Summary Comment	Q5 - Detailed Comment
	<ul style="list-style-type: none"> • Need to prevent any further loss of this valuable D1 asset.
Population Increase/ Demographic forecasts	<ul style="list-style-type: none"> • The basis of the demographic forecasts is unclear, particularly, the extent to which household formation is based on inward migration rather than the trend in the resident population. That in turn affects the provision of facilities and services.
	<ul style="list-style-type: none"> • The fact and degree of additional population growth should not be taken as a given. The level of growth is one of the things which the plan itself should determine.
	<ul style="list-style-type: none"> • The Core Strategy should be underpinned by a properly evidenced set of population and household formation forecasts rather than relying on the now redundant housing allocation figures imposed by the East of England Plan.
	<ul style="list-style-type: none"> • East Herts is already overcrowded and unpleasant to live in. We do not have the space or facilities for more people.
Mixed age population	<ul style="list-style-type: none"> • The community character and population balance of Hertford can only be maintained through a mixture of housing provision.
	<ul style="list-style-type: none"> • Sustained development of high density housing (often apartments) has led to changes in dynamics within communities and the character of the area.
	<ul style="list-style-type: none"> • Balance to be restored through lower density, higher quality developments.
	<ul style="list-style-type: none"> • Homes are being built for millionaires, not for young people or the elderly. Poor public transport does not provide for vulnerable groups.
	<ul style="list-style-type: none"> • Council must return to the provision of traditional Council Housing which remains the property of the Council and is rented to the most needy and vulnerable.
	<ul style="list-style-type: none"> • It is pointless providing 'affordable housing' if anyone can purchase it. • Developments need to be mixed; no ghettos and no gated estates and commercial and industrial properties need to be overlooked and not segregated.
Ageing Population	<ul style="list-style-type: none"> • Risk that outward expansion of Hertford could cause elderly residents to become isolated from the community. • A significant proportion of the limited residential development land available under Option 1 should be dedicated to housing for elderly residents to ensure that they continue to have good access to services in an enlarged town.
	<ul style="list-style-type: none"> • Important that the implications for future housing need of 37% of population growth being from people aged over 65 is not lost among standard housing policies. • The Council should specifically allocate sites for older persons accommodation to ensure delivery of this housing type, given the Council's reticence to approve specialised forms of older persons accommodation on windfall sites in the district
	<ul style="list-style-type: none"> • Emphasis should be placed on facilitating older people to down-size into smaller social housing dwellings. • New developments should be accepted only if the providers are mandated to produce dwellings suitable for an ageing population and to give priority in its allocation to this group.
	<ul style="list-style-type: none"> • Important to ensure that older people can live independently for longer, through good quality housing and with access to services that they are dependent on.
	PCS5
<ul style="list-style-type: none"> • Requires the provision of extra community facilities not only to keep pace with expanding population but also to catch up with it. 	
<ul style="list-style-type: none"> • Hertfordshire is woefully lacking in D1 community facilities due to the loss of D1 designated sites. 	
<ul style="list-style-type: none"> • Current policies state that it will be protected but it is constantly lost to residential development. 	
<ul style="list-style-type: none"> • Need to prevent any further loss of this valuable D1 asset. • Objective should be in conjunction with parish or town council. 	

Q5 - Summary Comment	Q5 - Detailed Comment
	<ul style="list-style-type: none"> • Need to encourage the expansion of existing facilities in addition to 'protecting' them, as many of the villages have few if any useful facilities. • Provide accessible and affordable computing facilities via local shops, pubs or churches. • Access via video conferencing or similar to Council and other services generally would alleviate isolation.
New Objective needed	<ul style="list-style-type: none"> • Objectives which acknowledge and value the lower crime rate in villages and rural areas. • New objective needed to provide a balanced community of mixed ages to live in a close community to provide social care to those in need and employment opportunities for others. • Specific objective needed to preserve the 'rich and diverse community life' in villages by encouraging a balanced population by age and supporting the retention/re-instatement of facilities. • New objective needed to keep the increase in population as low as possible. Increasing the population at anything other than very low rates over the next planning period will adversely impact all of EHC's best intentions in respect of Theme 5. • New objective needed to increase the quantum of affordable housing in order to maintain the population balance.
Miscellaneous	<ul style="list-style-type: none"> • If we carry on building, cities and towns will continue to grow, and eventually everybody will live in densely populated areas with no community cohesion and high crime-rates • A major aspect of anti-social behaviour is exceeding the speed limit (in this respect there is a high level of crime in East Herts). • Speeding gives rise to excessive noise. Traffic noise is an important consideration for the location of new homes. • Speeding severs the community of Standon. • Planning matters such as bypasses and road design are relevant to the district council. • Many problems faced by the police are the results of failures of our society at large in the family, schools, employment, personal and community morals and so on.
Site Specific	<ul style="list-style-type: none"> • Thomas Rivers Hospital, Sawbridgeworth

Comments received to Q5 in respect of other issues in Chapter 2

Q5 - Summary Comment	Q5 - Detailed Comment
Theme 1: Energy & Climate Change	<ul style="list-style-type: none"> • Concern that there will be an influx of planning applications prior to 2016 so that developers don't have to comply with proposed changes to building regulations
Theme 3: Housing	<ul style="list-style-type: none"> • Necessary for the Council to have a policy which actively promotes the delivery of specialised forms of older persons housing. • New build should be to Lifetime Homes standard • It is necessary for the Council to have a policy which promotes the delivery of Lifetime Homes. • Developments need to be mixed, ie. no ghettos and no gated estates; Commercial and industrial properties need to be overlooked and not segregated.
Theme 9: Infrastructure	<ul style="list-style-type: none"> • Sustained development of high density housing (often apartments) has led to density issues in terms of infrastructure. • Efforts are encouraged to bring good electronic services to those areas not so served.

Question 6: Theme 2 Policy Options (People and Community Safety)

Is our approach to dealing with the policy options for Theme 2 correct?

29 people/organisations provided comments in relation to Question 6. These included:

- 16 Individuals
- 4 Developers/landowners/agents/businesses
- 6 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Epping Forest District Council
 - Hertfordshire Constabulary
 - Jehovah's Witnesses
 - The Ware Society
 - Hertfordshire Biological Records Centre
- 3 Town and Parish Councils including:
 - Aston
 - Stanstead Abbots
 - Thorley

Q6 - Summary Comment	Q6 - Detailed Comment
Support	<ul style="list-style-type: none"> • Generally
Disagree	<ul style="list-style-type: none"> • Policy options are what one would expect to find but they are too general and sometimes in contention.
Policy Options- Creation of vibrant, sustainable communities	<ul style="list-style-type: none"> • Needs of all social levels must be satisfied but the current policy requiring a % of any built development to be affordable housing adds to the inward movement of more people.
	<ul style="list-style-type: none"> • Villages naturally evolve and if small numbers move into an area they can easily be assimilated into the community.
	<ul style="list-style-type: none"> • I question the use of the word 'vibrant'. Means 'lively, full of energy'. I think a lot of people would prefer a secluded, peaceful and quiet residential environment.
	<ul style="list-style-type: none"> • Development in villages should give priority to the changing needs of the immediate population to address the need to maintain community cohesion and sustainability.
	<ul style="list-style-type: none"> • Needs to be recognition that investment in infrastructure and services is required to support safe, mixed sustainable communities.
Policy Options - Mixed age population/Mixed housing	<ul style="list-style-type: none"> • Need to make available, according to the village's need:
	<ul style="list-style-type: none"> • Social housing: 1 and 2 bed houses/flats
	<ul style="list-style-type: none"> • Smaller starter homes:2-3 bed houses
	<ul style="list-style-type: none"> • Retirement homes to enable older residents to downsize (bungalows/ dormer-style houses, high quality managed flats)
	<ul style="list-style-type: none"> • The problem with flats is the lack of space for children to play which is essential.
	<ul style="list-style-type: none"> • Due to the increase in the elderly population, their particular requirements regarding housing and care in the community need to be addressed.
	<ul style="list-style-type: none"> • There is inadequate provision for family accommodation in the District; many current developments concentrate on singles, couples or large executive style accommodation. Correcting this brings in additional issues of catering for children and adolescents.
	<ul style="list-style-type: none"> • Do not understand why 'Criteria for meeting older people's housing need' is deferred when 'Maintaining a mixed-age population and encourage equal opportunities within new developments through providing a mix of housing' is included in Core Strategy policy.
Policy Options – Accessibility to services	<ul style="list-style-type: none"> • Older people in villages in particular must have better public transport to prevent either isolation in the village or forcing them to move elsewhere and break the ties with the community.
Policy Options - New community facilities	<ul style="list-style-type: none"> • Extra community facilities are required not only to keep pace with the expanding population but also to catch up with it. • Hertfordshire is woefully lacking in D1 community facilities due to the loss of D1 designated sites. • Current policies state that it will be protected but it is constantly lost to residential development. • Need policy to prevent any further loss of this valuable D1 asset.
	<ul style="list-style-type: none"> • New community facilities should meet the needs of all sectors of society – not just disadvantaged groups.
Design of developments and Crime	<ul style="list-style-type: none"> • Would like to see an approach which acknowledges and values the lower crime rate in villages and rural areas.
	<ul style="list-style-type: none"> • 'Design of developments to reduce crime' appears to only tackle new developments.
	<ul style="list-style-type: none"> • Large scale development encourages crime where a large influx of newcomers into an area can not integrate.
	<ul style="list-style-type: none"> • Designing developments appropriately to reduce crime and anti-social

Q6 - Summary Comment	Q6 - Detailed Comment
	behaviour is part of the solution but not the whole story.
	<ul style="list-style-type: none"> The emphasis should be on protection of the individual and their property. Failure to cater for the needs of children and adolescents within developments encourages vandalism, graffiti, and petty crime and lays the groundwork for anti-social and dissociated behaviours.
New polices	<ul style="list-style-type: none"> Need new policies which will enable village residents to stay in their village. Need policies to provide mobile services in the villages: shops, libraries, post offices, doctors, police. Need policies to provide support for local social infrastructure and culture: village hall, sports club, village societies. Need specific policy and site allocations for specialised forms of older peoples accommodation. Key policy priority should be protection of individuals and their property, in whatever type of settlement they live. Policies will be needed to address the issue of 'fear of crime'.
Miscellaneous	<ul style="list-style-type: none"> Most crime in the region is caused by over indulgence of alcohol and drugs. Needs to be a better balance between the needs of the community and the freedom of the individual.

Comments received to Q6 in respect of other issues in Chapter 2

Q6 - Summary Comment	Q6 - Detailed Comment
Theme 2: People & Community Safety	<ul style="list-style-type: none"> Support strategic objective PCS4
Theme 3: Housing	<ul style="list-style-type: none"> Need specific new policies which will enable village residents to stay in their villages, by making available, according to the village's need: <ul style="list-style-type: none"> Social housing: 1 and 2 bed houses/flats Smaller starter homes:2-3 bed houses Retirement homes to enable older residents to downsize (bungalows/ dormer-style houses, high quality managed flats) The problem with flats is the lack of space for children to play which is essential. New way of financing affordable housing needs to be found. Need more affordable housing. Due to the increase in the elderly population, their particular requirements regarding housing and care in the community need to be addressed. Need specific policy and site allocations for specialised forms of older persons accommodation.
Theme 6: Economy, Prosperity & Skills	<ul style="list-style-type: none"> Maintain and create local employment opportunities for all age classes.

Comments received to Q6 in respect of other Chapters

Chapter 3: Development Strategy

Q6 - Summary Comment	Q6 - Detailed Comment
Development Strategy	<ul style="list-style-type: none"> Would like to see an approach that seeks to protect villages and the rural area from development.

Question 7: Theme 3: LDF Strategic Objectives (Housing)

Have we got the LDF strategic objectives for Theme 3 correct?

105 people/organisations provided comments in relation to Question 7. These included:

- 43 Individuals
- 34 Developers/landowners/agents/businesses
- 14 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - East of England Development Agency
 - Epping Forest District Council
 - Harlow Council
 - Harlow Renaissance
 - Hertfordshire County Council – Environment
 - Hertford Civic Society
 - Hertfordshire Association of Parish and Town Councils
 - Hertfordshire Biological Records Centre
 - Homes & Communities Agency
 - National Grid Property Holdings Ltd / National Grid Gas
 - The Ware Society
 - Transition Hertford
- 14 Town and Parish Council including:
 - Aston
 - Buntingford Town
 - Cottered
 - Great Munden
 - Hertford Heath
 - Hertford Town
 - High Wych
 - Little Hadham
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Thundridge
 - Walkern
 - Watton-at-Stone

Q7 - Summary Comment	Q7 - detailed Comment
Strategic Objectives - General	<ul style="list-style-type: none"> Support / broadly correct
	<ul style="list-style-type: none"> Incorrect / Object
	<ul style="list-style-type: none"> Difficult to comment in absence of definitive housing figure Expected but too general and sometimes in contention Reference to national policy objectives required but do not repeat Specifically identify objectives of strategic importance to East Herts
	HOU1
<ul style="list-style-type: none"> Aim of objective is ambiguous - minimum quality does not relate to flexibility of housing and should be deleted 	
Minimum standards	<ul style="list-style-type: none"> must be applied flexibly must take account of viability outside scope of LDF should not lower standards
Support housing target	<ul style="list-style-type: none"> East of England Plan still part of the development plan Realistic target - RSS well-researched and democratically based Necessary to enable locally generated needs to be met
Object to housing target	<ul style="list-style-type: none"> Irrelevant No justification for 600 per annum Inaccurate
	<ul style="list-style-type: none"> Population forecast flawed / unclear - particularly balanced between resident population and inward migration
	<ul style="list-style-type: none"> Too high
	<ul style="list-style-type: none"> Figure based on revoked East of England Plan
	<ul style="list-style-type: none"> Does not derive from issues identified - should be based on local issues and needs
	<ul style="list-style-type: none"> Conflicts with stated objective of 425 per annum
Review housing target	<ul style="list-style-type: none"> Housing figure needs to be reviewed
	<ul style="list-style-type: none"> Should be meeting the needs of our existing and future internally generated population - not encourage inward migration
	<ul style="list-style-type: none"> East Herts must meet a wider need than that generated by its existing population
	<ul style="list-style-type: none"> RSS sets minimum targets - may be a requirement for more houses and objective may need to be reworded
	<ul style="list-style-type: none"> If East Herts intend to move away from RSS figures, they must conduct a full consultation on the methodology they intend to adopt to determine the housing numbers in the Preferred Options
	<ul style="list-style-type: none"> Target should be justified, evidenced based and based on local need, demand, capacity, jobs, infrastructure etc
	<ul style="list-style-type: none"> Housing growth also driven by diminishing size of average households
	<ul style="list-style-type: none"> SHMA and evidence at the national level indicate that housing in excess of RSS target is needed to address housing need and high house price to income ratio
	<ul style="list-style-type: none"> Whilst the views of local residents should be considered, the housing target must be supported by an appropriate evidence base, in accordance with PPS3
	<ul style="list-style-type: none"> Core Strategies must be founded on robust evidence - RSS provides a robust evidence base
	<ul style="list-style-type: none"> SHMA clearly sets out need in East Herts
	Reduction of housing target
<ul style="list-style-type: none"> Restricting housing numbers where in-migration is high will not meet local needs 	
<ul style="list-style-type: none"> No reasonable basis / justification for reducing the housing target 	
<p>Reducing housing target would:</p> <ul style="list-style-type: none"> increase problems of affordability stifle economic growth increase overcrowding increase housing waiting list and housing benefit bill increase the gap between haves and have-nots and resentment between 	

Q7 - Summary Comment	Q7 - detailed Comment
	generations
Housing Supply	<ul style="list-style-type: none"> Need to maintain 5 year supply - allowance needs to be made for those sites that will not be delivered. To-find figure will be greater than 8,500 and consideration must be given to past performance
	<ul style="list-style-type: none"> Should not include sites with planning permission unless they can demonstrate that the sites are developable
	<ul style="list-style-type: none"> Specific sites identified in sustainable locations to ensure housing delivery
	<ul style="list-style-type: none"> Housing in East Herts cannot be dealt with in isolation – regional strategy required and issue of commuting is dealt with
HOU2 - Comments	<ul style="list-style-type: none"> Support - additional homes provided in suitable and sustainable locations that provide choice of housing types, sizes and tenures
	<ul style="list-style-type: none"> House types should suit the location
	<ul style="list-style-type: none"> Outside control of Council - can only “encourage and facilitate” rather than “ensure”
	<ul style="list-style-type: none"> Costs should be met by developers not Council misusing our money
	<ul style="list-style-type: none"> Can only be addressed where there is a will to deliver housing and the matter of assessing appropriate locations to deliver quantum of housing is vitally important
Housing Size Mix	<ul style="list-style-type: none"> Development should provide a balanced housing stock to cater for every local resident Imperative that safeguards are put in place to ensure a mixed housing stock that outlasts any short-term market trends Low number of 1-2 bedroom houses/bungalows; brownfield sites have favoured apartments meaning greenfield sites are more attractive for providing future mix of housing although with increasing land and construction costs, apartments are favoured option irrespective of location Specific policy to ensure right mix of housing to preserve quality of village life Important to provide a range of types of housing in a range of different locations Housing should retain character of area and be a mix of size (including low cost) rather than large houses (especially in villages) which only high earners can afford that does nothing to maintain local shops, schools, businesses Contributing factor to unaffordable housing is extensions to small properties – price rises and no longer affordable. Needs to be controlled Demand for smaller homes is a direct result of the cost of the product and the level of available finance. People tend to buy the largest property that they can afford irrespective of their household size: the Council cannot dictate what type of market housing should be built
HOU3 Comments	<ul style="list-style-type: none"> Supported
	<ul style="list-style-type: none"> Strengthened to read “sufficient accommodation based on clearly identified local need”
Location of Gypsy & Traveller Sites	<ul style="list-style-type: none"> Welcome location of sites in sustainable locations but this must be in consultation with settled and traveller communities
	<ul style="list-style-type: none"> Their choice that they choose not to integrate with settled communities and sites away from everybody should be made available
	<ul style="list-style-type: none"> Do not agree that they should be located near better services
	<ul style="list-style-type: none"> Pitches should be limited to existing sites
	<ul style="list-style-type: none"> They know where they want to go and what type of accommodation they want - they need to be asked
Need for Gypsy & Traveller Sites	<ul style="list-style-type: none"> Question whether there is any real pressure from Gypsy and Travellers to live in East Herts - is this a legacy from East of England Plan
	<ul style="list-style-type: none"> Over-emphasis on needs of Gypsies and Travellers
	<ul style="list-style-type: none"> Feared concern but may reduce illegal encampments
	<ul style="list-style-type: none"> Must make provision for Gypsies and Travellers to meet locally identified need i.e. 5 pitches which is based on robust evidence
	<ul style="list-style-type: none"> RSS used a redistribution approach identifying 25 pitches for East Herts owing to large amount of non Green Belt land and not local need which goes against Circular Requirement for transit pitches is not based on sound evidence and as such no specific allocations should be made until technical study undertaken

Q7 - Summary Comment	Q7 - detailed Comment
	<ul style="list-style-type: none"> Requirement for travelling showpeople is invalid and as such no specific allocations should be made until technical study undertaken
HOU4	<ul style="list-style-type: none"> Welcomed / Supported Should include reference to providing special needs accommodation for people with learning, mental, physical disabilities Expect to see appropriate policies in future Core Strategy documents Specialist accommodation should be where the individual wishes it to be and not where it suits the Council
Ageing Population	<ul style="list-style-type: none"> East Herts has an ageing population an suitable accommodation must be delivered to enable older people to live independently and longer If there is an ageing population why are so many 5-6 bedroom houses being built? / Lack of smaller properties Housing for elderly is often boring - return to 'almshouses' pattern around a quadrangle could encourage community and secure environment Homes and jobs for the commercially active must be provided Do not understand the term "flexible housing" Provide affordable housing for frail elderly and people or people with physical, learning, mental disabilities
HOU5 Comments	<ul style="list-style-type: none"> Broadly support / necessary Definition is from previous Government Form should be in accordance with PPS3 Outside control of Council - can only "encourage and facilitate" rather than "ensure" Council has a holistic view of future need, challenges and opportunities and an encouraging willingness to work with partners to bring about best outcome for East Herts General public has no time to familiarise themselves with the nuances of local government language – will assign a literal interpretation to "affordable housing for local needs" Include some commentary on housing mix and tenure (e.g. SHMA Viability work) especially in respect of finding correct balance to suit differing needs of residents in and around Harlow
Objections to provision of affordable housing	<ul style="list-style-type: none"> Costs should be met by developers not Council misusing our money What evidence is there that East Herts has had any success in delivering affordable housing? Any beneficial effect in medium to long-term?
Affordable Housing Target / Viability	<ul style="list-style-type: none"> High affordable housing targets may discourage developers from bringing land forward now or in the future Unreasonable for Council to adopt a stance other than to negotiate Should recognise that different postcodes within the district have different levels of viability and it should make it clear when and what level of public subsidy is required Policy must be flexible and assessed on a site-by-site basis Take into account viability Take into account other S106 'burdens' <p>Based on PPS3:</p> <ul style="list-style-type: none"> evidence of need and demand and long-term house prices (SHMA) advice on the impact on affordability (NHPAU) Governments latest population projections and economic growth forecasts
Mix of housing	<ul style="list-style-type: none"> Equal prominence should be given to the provision of a range of market housing as well as affordable Sustainable communities will emerge where there is a real mix of housing to cater for full range of socio-economic groups Reference and support for low cost housing Part buy affordable housing is an option Good supply of intermediate affordable housing is important No demarcation between affordable and "unaffordable"
Housing for local people	<ul style="list-style-type: none"> Additional housing should meet the needs of the resident population Affordable housing rather than housing for incomers displacing local people

Q7 - Summary Comment	Q7 - detailed Comment
	<ul style="list-style-type: none"> • Difficult for young people to stay in their community because of cost of housing • Enable local people to stay in their community - aids social cohesion • Local children should be given priority on housing lists
Benefits of affordable housing	<ul style="list-style-type: none"> • Affordable housing policy should also recognise that where there are clear environmental benefits from a proposed development this may offset a proportion of the affordable housing requirement
Cause of unaffordable housing	<ul style="list-style-type: none"> • A financial not a house-building problem (inflated mortgages and cost of private rent) that can only be tackled at the highest level • More houses will not make prices lower - it will fuel buy-to-let market (people from outside UK will buy here which defeats the objective) • Growth forecasts suggest local economy may take some time to recover from current recession implying that poor affordability is unlikely to improve • Housing gap in East Herts for lower quartile earners (significant) and median or slightly higher quartile will also struggle to afford market housing
Management of affordable housing	<ul style="list-style-type: none"> • Must ensure that affordable housing remains in perpetuity • Ensure existing stock is well maintained and affordable
Housing Supply and Affordability	<ul style="list-style-type: none"> • Given Government cuts to housing budget, affordable housing will only be delivered through market housing - thus high numbers are needed to meet significant affordable housing need • Provision of homes should be a priority for the Core Strategy to tackle affordability • Need to significantly increase the supply of all housing (to address affordability) • Ensure adequate quantity to serve needs of lower paid and vulnerable • RSS housing targets minima because below level NHPAU advised is needed to prevent further deterioration in affordability • Meet demand, reduce pressure for new housing and therefore reduce prices to ease affordability • Big unfilled demand for privately owned and Council / Housing association housing • New affordable housing is unlikely to have a material impact on its overall availability - municipalisation of existing housing is necessary to impact on supply
Location of affordable housing	<ul style="list-style-type: none"> • Best provided in strategic locations close to employment
Lifetime Homes	<ul style="list-style-type: none"> • No justification (and consideration of effects) that all housing should be built to Lifetime Homes Standard
Identification of need	<ul style="list-style-type: none"> • Voids should be taken into account nationally and locally in determining housing needs • cannot be expressed solely in terms of number of dwellings • East Herts is likely to come under increasing pressure from commuting households
Housing and Employment	<ul style="list-style-type: none"> • Planning at heart of economic recovery - economic growth should be at the heart of the Core Strategy • Businesses should play a key part - strategic planning role of LEPs • Build number of homes required to match job opportunities that can be accessed easily and at a reasonable time and cost(e.g. Harlow, Stevenage) • Recognise locational advantages in LSCP Growth area and London Arc Sub-region • Refer to cross-boundary and wider housing issues • New objective - new housing should be responsive to areas where economic growth is forecasted in order to attract and retain skills base (relationship should be referred to in Theme 5) • Lack of significant housing hinders economic recovery and to avoid serious consequences of economic growth without sufficient labour supply (relationship should be referred to in Theme 5) • Housing affordability is a key driving factor and critical in informing the district's approach to growth but also in relation to employment provision and growth aspirations of neighbouring areas • Traditionally lived and worked locally and communal transport provided by

Q7 - Summary Comment	Q7 - detailed Comment
	employers
Sustainable housing	Build sustainable homes / modify existing homes: <ul style="list-style-type: none"> • produce buildings that lock up more carbon than they produce • energy efficient • have local distinctiveness • stimulate local economy rather than leeching from it • use local materials • scale up the small-scale
Consultation	Need to provide clarity and certainty on housing target before options are next put forward for consultation
Critique of consultation	<ul style="list-style-type: none"> • Consultation based on out-of-date material • Consultation does not provide the local needs evidence base for East Herts • Currently envisaged Core Strategy will be rendered obsolete and need for a new town style of development will arise – M11 corridor obvious candidate for this • Inconsistencies in data periods and guesses at what is required.

Comments received to Q7 in respect of other Chapters

Chapter 3: Development Strategy

Q7 - Summary Comment	Q7 - Detailed Comment
East of England Plan	<ul style="list-style-type: none"> • RSS evidence base robustly tested and found sound at examination - need a step-change in housing supply • No longer key driver of policy and future plans should be deferred until new planning regime is detailed • Council should be focused on pushing back against previous Government's top-down impositions • RSS housing and Gypsy and Traveller targets which we do not support are being abolished • All reference to RSS should be removed but SHMA indicates target of 600 per annum is still appropriate • Antithesis to localism
Principle of development	<ul style="list-style-type: none"> • Do not overdevelop • Heavily developed and prosperous areas should not compete for growth with those areas where unemployment rates are much higher • Additional policy to consider the impact of development on existing communities, the adequacy of the infrastructure and the sustainability of development • Must oppose high level of development if East Herts is to remain a rural district • New settlement in Hertfordshire to meet Hertfordshire's expansion requirements
Bottom up planning	<ul style="list-style-type: none"> • Bottom-up, identification of local needs can best be achieved through parish and town plans which will form the building block for District Plan • East Herts Council should concern itself with the needs arising from and the wishes of the residents of the District • Welcome fact that East Herts Council is taking account of parish plans to understand the issues facing East Herts • Community right to build and incentives
Brownfield / Greenfield / Green Belt	<ul style="list-style-type: none"> • Inevitable that there will be greenfield (and Green Belt) releases to meet housing requirement • Green Belt Review required since most suitable and sustainable sites may be in the Green Belt • First preference should be given to those brownfield sites within urban centres in close proximity to public transport • Council may need to be flexible in respect of housing supply and promote development in the smaller centres and Green Belt to meet longer term housing

Q7 - Summary Comment	Q7 - Detailed Comment
	<ul style="list-style-type: none"> need Bring back into use the 1000+ empty homes in East Herts to reduce impact on green fields and Green Belt

Chapter 9: Villages

Q7 - Summary Comments	Q7 - Detailed Comments
Housing in villages	<ul style="list-style-type: none"> Development in smaller service villages may help to revitalise them but effects are short lived as houses get extended and become more expensive. Policies which encourage limited development and give priority to local residents to enable them to stay in the village would be acceptable (e.g. small social housing, small starter homes, small retirement homes) Need to scatter new housing in rural areas Need for specialist residential accommodation Take into account Parish Needs Surveys Need for affordable housing will be satisfied as “natural development”
Objections to development in villages	<ul style="list-style-type: none"> What point at which development destroys the nature of the village Building houses in villages to justify the claim that people cannot afford to live there and more housing will help support village facilities Building at high density to get 40% affordable housing Exceeding local needs and using village housing to satisfy district wide need Seeking as much rented affordable housing as possible Intermixing social rented housing with open market

Chapter 10: North of Harlow

Q7 - Summary Comment	Q7 - Detailed Comment
Principle of development	<ul style="list-style-type: none"> Assumptions incorrect - no reason why East Herts should accommodate houses for Harlow
Housing Need	<ul style="list-style-type: none"> Harlow's housing needs may be different to those of East Herts and any future development in the Harlow area should recognise different roles and aspirations of Harlow

Question 8: Theme 3 Policy Options (Housing)

Is our approach to dealing with the policy options for Theme 3 correct?

38 people/organisations provided comments in relation to Question 8. These included:

- 14 Individuals
- 12 Developers/landowners/agents/businesses
- 6 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Broxbourne Borough Council
 - Epping Forest District Council
 - Harlow Renaissance
 - National Grid Property Holdings Ltd / National Grid Gas
 - Transition Hertford
- 6 Town and Parish Councils including:
 - Aston
 - Braughing
 - Cottered
 - Stanstead Abbots
 - Thorley
 - Watton-at-Stone

Q8 - Summary Comment	Q8 - Detailed Comment
Approach correct	<ul style="list-style-type: none"> Realistic, welcomed, appropriate, no-objection, broadly right
Approach incorrect	<ul style="list-style-type: none"> What one would expect but too general and sometimes in contention
Bullet point 1: broad locations	<ul style="list-style-type: none"> As well as establishing broad locations, Core Strategy should attribute numbers to them
	<ul style="list-style-type: none"> Meaning of broad locations is unclear - can only be site specific
	<ul style="list-style-type: none"> Core Strategy should indicate actual areas of growth e.g. Bishop's Stortford North and Buntingford East
	<ul style="list-style-type: none"> Broad locations only identified after proper re-consideration of targets
Bullet point 1: PDL	<ul style="list-style-type: none"> Additional bullet point in Core Strategy approaches: housing to be located in sustainable locations including PDL and Green Belt sites adjacent to built-up area
	<ul style="list-style-type: none"> Include a commitment to PDL to minimise amount of greenfield land required. Should be included as a policy
Bullet point 1: Green Belt	<ul style="list-style-type: none"> Diminution of Green Belt resisted and existing boundaries reassessed to protect our towns
	<ul style="list-style-type: none"> Must not be sacrificed - public consultation should be held for any proposal to build on Green Belt
	<ul style="list-style-type: none"> Acknowledge that some development will need to be in the Green Belt
Bullet Point 1: G&T	<ul style="list-style-type: none"> Welcomed
	<ul style="list-style-type: none"> Huge problem for everybody. Do not object to way they live but do not agree that they should be in locations where there are better services. If they want to remain separate they should live away from everybody.
	<ul style="list-style-type: none"> G&T know where they want to live and what type of accommodation they want - they need to be asked
	<ul style="list-style-type: none"> Support idea of G&T sites being funded by a levy or licence fee on users equivalent to Council tax; ground rent equivalent to band A - not by East Herts Council tax payers
	<ul style="list-style-type: none"> RSS to be abolished and targets to be based on local need: do not think Core Strategy provides adequate evidence base for local G&T need
	<ul style="list-style-type: none"> Additional pitches limited to existing sites
Bullet point 2: affordable housing	<ul style="list-style-type: none"> East Herts should seeks to meet local needs and does not have an adverse impact on affordability or homelessness on Broxbourne
	<ul style="list-style-type: none"> East Herts 'green bubble' will burst if we don't constrain housing to local needs
	<ul style="list-style-type: none"> Is a financial problem, not a house building problem that needs to be tackled at the highest level and cannot be solved by over-building as it simply attracts more people from overseas. More houses will not make prices lower: simply fuel buy to let market.
	<ul style="list-style-type: none"> Must recognise that growth must fulfil an existing and real need not drive a market
	<ul style="list-style-type: none"> Core Strategy does not include results of SHMA which may result in under-provision of housing in East Herts with a consequential impact on Broxbourne
	<ul style="list-style-type: none"> Flexible approach to tenure split taking into account viability and site constraints to ensure delivery
Bullet Point 3: specialist accommodation	<ul style="list-style-type: none"> Include suitable provision for people with disabilities
	<ul style="list-style-type: none"> Assumption that older people need specialist residential care is debatable
	<ul style="list-style-type: none"> Welcomed, support allocation for older persons accommodation
	<ul style="list-style-type: none"> Approach to dealing with specialist accommodation is contradictory in paras 2.6.15 and 2.6.16 as specialist accommodation will be dealt with in site allocations document. Agree should be included in Core Strategy but Core Strategy should allocate strategic sites
Housing sustainability	<ul style="list-style-type: none"> Lifetime homes - does it include, as it should, energy and water consumption efficiency?
	<ul style="list-style-type: none"> Developers must be forbidden from building houses that do not conform to highest standards of energy efficiency and climate change mitigation
	<ul style="list-style-type: none"> Apply 'transition thinking' to housing: build houses using local materials and no space heating, are locally distinctive and stimulate local economy
	<ul style="list-style-type: none"> Apply 'transition thinking' to housing: retrofitting

Q8 - Summary Comment	Q8 - Detailed Comment
Rural housing	<ul style="list-style-type: none"> • New objective HOU6: Category 2 Village policy does not work: therefore new objective to ensure right mix of housing to preserve quality of life in villages
	<ul style="list-style-type: none"> • Innovative approach to rural exceptions required in order to deliver rural affordable housing in current financial climate
	<ul style="list-style-type: none"> • Apply 'transition thinking' to housing: new models for housing e.g. co-housing, co-operatives etc; scale-up existing small-scale one-off housing
Housing target	<ul style="list-style-type: none"> • East of England Plan now discredited, its housing projections were never accurate and are now irrelevant and should be ignored; clarity over 8,500 figure
	<ul style="list-style-type: none"> • RSS to be abolished and targets to be based on local need: do not think Core Strategy provides adequate evidence base for local housing need
	<ul style="list-style-type: none"> • Current growth objectives unsustainable
Housing types and sizes	<ul style="list-style-type: none"> • If there is an ageing population why are so many 5&6 bed executive homes being built; excess of large executive houses being built; need is for smaller houses
	<ul style="list-style-type: none"> • Need to be a replacement of 'traditional' semi which has been lost from the market
	<ul style="list-style-type: none"> • Prioritise re-use of empty and second homes - should be a policy to make use of these before new ones are built
	<ul style="list-style-type: none"> • No requirement or restriction on developers to deliver homes we need.
	<ul style="list-style-type: none"> • Housing design and style must reflect surroundings
	<ul style="list-style-type: none"> • Not lifetime homes but lifetime communities that allow people to move house within their community as their life changes. Continual bar to this is pressure from newcomers: action for which is needed on a regional basis
Amenity and space	<ul style="list-style-type: none"> • Should not be overly onerous, reflect housing demand and can be applied flexibly on a site by site basis
Specific sites	<ul style="list-style-type: none"> • Thomas Rivers; Hertford and Ware Police Station
Other	<ul style="list-style-type: none"> • Reserve right to comment later
	<ul style="list-style-type: none"> • Welcome reference to parish plans

Comments received to Q8 in respect of other issues in Chapter 2

Q8 - Summary Comment	Q8 - Detailed Comment
HOU Objectives correct	<ul style="list-style-type: none"> • Broadly correct
	<ul style="list-style-type: none"> • Subject to East of England Plan Review
HOU Objectives incorrect	<ul style="list-style-type: none"> • Assumptions incorrect and policy options vague; what one would expect but too general and sometimes in contention
	<ul style="list-style-type: none"> • Insufficient because achievement of objectives beyond Council's power. Developers not obliged to conform. Need to address limits to your power

Question 9: Theme 4 LDF Strategic Objectives (Character)

Have we got the LDF strategic objectives for Theme 4 correct?

66 people/organisations provided comments in relation to Question 9. These included:

- 25 Individuals
- 20 Developers/landowners/agents/businesses
- 8 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Broxbourne Woods Area Conservation Society
 - Buntingford Civic Society
 - Epping Forest District Council
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council – Environment
 - Lee Valley Regional Park Authority
 - Natural England
- 13 Town and Parish Councils including:
 - Aston
 - Braughing
 - Cottered
 - Great Munden
 - Hertford
 - High Wych
 - Little Hadham
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Thundridge
 - Walkern
 - Watton-at-Stone

Q9 - Summary Comment	Q9 - Detailed Comment
Strategic Objectives - General	<ul style="list-style-type: none"> • Support/ broadly correct • These objectives should be given high priority. • Concept of character is devalued by the widespread use of terms such as 'special' and 'unique'. • Firm justification for the use of these words is needed. • It is impossible for the character of East Herts to not change greatly with the increase in population, traffic and the drain on resources. • It is too big a subject that deserves more than glib statements and responses. • Objectives are admirable but there is little evidence that these are achieved in practice, and there appears to be no legal requirement for developers to uphold these objectives. • Objectives are what one would expect to find, but they are too general and sometimes in contention.
North of Harlow	<ul style="list-style-type: none"> • Do not agree with paragraph 2.7.8 • Paragraph 2.7.8 is incorrect in that it implies that there is the opportunity to combine Harlow North with the heritage of East Herts in a positive way. • Heritage of East Herts would be wrecked over a significant area if this development was allowed to happen.
CHA1	<ul style="list-style-type: none"> • Support • Objective appears to confuse the Green Belt and the wider rural area within the District. • These areas are distinct in planning policy terms, and should not be confused in a strategic objective. • Not all of the rural area in East Herts is within the Green Belt. • It is appropriate to continue the strategy of applying alternative policies to the area beyond the Green Belt. • Building thousands of houses and roads is not the easiest concept to present the maintenance of the countryside.
Wording	<ul style="list-style-type: none"> • 'appropriate management' – this phrase could be used by developers for all kinds of cynical future development. • Objective needs to be re-worded to provide greater protection to 'Rural Area outside of the Green Belt' from inappropriate development • Objective should be modified to read 'The whole rural area.....through the appropriate management of the Green Belt and the Rural Area beyond the Green Belt'. • Needs to have a caveat that the objective should be promoted via policies that are compatible with objectives HOU2, HOU3, HOU4, and HOU5 together with ESP1, all of which may require the release of greenfield/ Green Belt land to satisfy the housing and employment land requirements of the LDF period.
Green Bubble	<ul style="list-style-type: none"> • Agree that East Herts plays an important role as a 'green bubble' within the geography of the wider area. Any development in East Herts must allow for this amenity to continue. • Objective reads as though the whole District is a rural area with no major settlements or towns due to the use of the term 'green bubble'. • Objective should take account of settlements within the District which also contribute to the character of East Herts.
Location Specific – Green Bubble	<ul style="list-style-type: none"> • The 'green bubble' effect of CHA1 has particular relevance to Tewin. • There is a danger that continual development in Tewin will move the psychological boundary of the 'green bubble' beyond Tewin and this will afford less protection to the Mimram Valley.
Urban Sprawl	<ul style="list-style-type: none"> • The openness of rural areas needs to be maintained in order to prevent urban sprawl. • Need to stop East Herts being dragged ever deeper into London's urban sprawl.

Q9 - Summary Comment	Q9 - Detailed Comment
	<ul style="list-style-type: none"> CHA1 needs to recognise that many villages are located close to urban areas and therefore their capacity to expand without adding to sprawl is limited. Villages must retain the 'isolation' that identifies them as villages and which makes them a haven for leisure. This isolation must not just be physical, it must also be perceived when viewed from adjoining areas.
Green Belt	<ul style="list-style-type: none"> Prime objective should be to preserve the Green Belt and maintain openness. The Green Belt is vital in preserving the existing historic character of the towns and villages of East Hertfordshire and I oppose any changes to it. The legal confines of the Green Belt must be respected and cannot be 'revised' to suit relentless and unsustainable growth. EHC needs to focus much more on prevention of coalescence between its settlements. Need to plan development without impacting the Green Belt. It is unnecessary and undesirable to include existing settlements and groups of rural buildings within the Green Belt in order to prevent urban sprawl. Development within the envelope of these complexes does not encroach upon the countryside but it can often be important in order to ensure that the countryside can prosper. CHA1 seems to imply that all change will be resisted. The required housing numbers cannot be delivered without some incursions into the Green Belt and greenfield land. Urge the Council to recognise that there may be a need to commence the release of greenfield/Green Belt sites to meet long-term housing need.
Location Specific – Green Belt	<ul style="list-style-type: none"> Residents are strongly opposed to erosion of the Green Belt because of the wish to protect the rural character of Stanstead Abbots and prevent coalescence with neighbouring towns and villages.
Green Belt Review	<ul style="list-style-type: none"> CHA1 should not imply that a Green Belt review for the district will not be undertaken. We support a Green Belt review as proposed at paragraphs 3.6.6 – 3.6.9 of the consultation document. Support a Green Belt review in particular in relation to the north of Bishop's Stortford Any changes in the boundaries and definitions of the Green Belt in East Herts will have a devastating effect on most of the Key Issues specified especially No's 3, 4, 6, 7 and No 8. Accept that the current statutory Green Belt will need some reviews. Any loss of Green Belt land should be compensated for by protecting equivalent acres around other settlements. Green Belt review should preserve wildlife corridors by leaving fingers that connect into settlements, preferably where 'green' parks or similar pre-exist.
Education	<ul style="list-style-type: none"> Presence of a Green Belt designation washing over sites being used for education acts as a constraint and obstacle in being able to respond to the need to provide new, or to enhance existing facilities. Need to remove the Green Belt designation from school sites. If removal from Green Belt is not appropriate, school sites in the Green Belt should be designated as Major Developed Sites (MDS) Review boundaries of current school sites with MDS status to enable provision of new facilities. Important to consider the identification of additional/extended playing fields for some of the existing schools in the district.
CHA2	<ul style="list-style-type: none"> Support
Landscape	<ul style="list-style-type: none"> Agricultural land/open countryside surrounding towns should be preserved

Q9 - Summary Comment	Q9 - Detailed Comment
	<p>where possible.</p> <ul style="list-style-type: none"> • Local landscape character assessments are recommended to be prepared in order to inform the plan making process and shape future development. • Many country towns and villages are of considerable historic value and make an important contribution to the character of the countryside. • Need to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced and only allow development that respects and, where possible, enhances these particular qualities. <ul style="list-style-type: none"> • Green space is important in towns and villages and must be protected. • In the affected locality as a whole the Council should be aiming for maintenance of and if possible enhancement of the landscape. • Landscape Character Assessment is crucial.
Location Specific - Landscape	<ul style="list-style-type: none"> • Rural area and landscape surrounding Buntingford create the setting in which the historic market town sits and is part of the towns character, which makes the town special to the residents that live there. • Protecting the historic routes into Buntingford from inappropriate development will assist in preserving its setting. • Retaining agricultural and open land along the northern part of Ermine Street will help preserve the character of the historic route from Buntingford to Royston. • Northern edges of Buntingford are visually sensitive and should be protected from inappropriate development. <ul style="list-style-type: none"> • Concern that the green spaces between areas of build in Braughing may be at risk of development. • The green spaces are an integral part of historic Braughing and must be protected. • It is the 'cherished local scene and appearance' of the integrated built and green areas which make Braughing village unique. • The Parish Council believes that Braughing has a distinctive identity which cannot be lost to development and call on the District Council to recognise the unique build and setting, and set policy in place to ensure it is conserved in perpetuity. <ul style="list-style-type: none"> • The historic and rural character of Little Hadham must be protected for future generations.
CHA3	<ul style="list-style-type: none"> • Support • Important • CHA3 must be made clearer so that overdevelopment is not considered the norm.
Design	<ul style="list-style-type: none"> • Recent housing developments have done little to enhance the environment of East Herts. <ul style="list-style-type: none"> • Design in rural areas is critical. • Design of houses is just as important as the number of houses being built. • Trendy pretentious architecture should have no place in the future plans of East Herts. • Character and traditional design helps to prevent ghettos. <ul style="list-style-type: none"> • Use local materials such as cob, lathe and plaster, and thatched roofs. These materials are more historic and the properties tend to be highly sought after. • Innovative, sympathetic design based on natural products and incorporating the natural world can make house building and placement acceptable to communities who do not want to see their 'place' changed beyond recognition. <ul style="list-style-type: none"> • Need to ensure that developments are in keeping and in character with the existing urban and rural environments. • Too many cases of communities undermined by unsympathetic and inappropriate development. • It should be a planning condition that applicants show how their

Q9 - Summary Comment	Q9 - Detailed Comment
	<p>development fits the character and scale of the community.</p> <ul style="list-style-type: none"> • Development should allow for modern design using energy efficient materials as well as traditional styles and materials. • CHA3 is too prescriptive with regard to the design of new development requiring it to replicate, or form a pastiche of the local vernacular. • Objective contrary to paragraph 2.7.7. • Good design can be different in style to its local vernacular context but still complementary, so the wording of the objective needs to allow for this flexibility. • Issue should be judged on the merits of each proposal. • Whilst new development should be developed with an understanding of its context, this should not preclude appropriate contemporary architectural design being supported. • It is unrealistic to require all new development to use local materials and/or building styles.
Density	<ul style="list-style-type: none"> • Too many small houses of a standard design being crammed into a small space and not being adapted to the location. • Would be better to have high density housing with space around the houses. • Denser housing can only reduce reliance on the private car if the development is in fully serviced towns/larger villages. • Reference to the efficient use of land might be interpreted as high density residential development contrary to recent government guidance on this subject. • If a build is too dense, the sense of place is lost due to the loss of green space.
New Objective wording	<ul style="list-style-type: none"> • Ensure that all new development is well designed, reflects/respects its local vernacular context and where appropriate uses local materials and/or building styles as appropriate to maintain a unique sense of place. By utilising sustainable and innovative approaches to design, new development should also seek to make the most efficient use of land, including land that has been previously developed.
CHA4	<ul style="list-style-type: none"> • Support
Heritage Assets	<ul style="list-style-type: none"> • Little consideration of PPS5 policies or the historic environment generally within the consultation document. • Little consistency in any reference made to it. • No use has been made of key and readily available information on the historic environment contained within the Hertfordshire Historic Environment Report. • The Core Strategy is deficient in respect to the evidence base used for the historic environment. • No use has been made of either the Hertfordshire Historic Landscape Character map or the Extensive Urban Surveys of the historic towns of Hertford, Ware, Sawbridgeworth, Buntingford and Bishop's Stortford which provide summaries of the archaeological and historic development of the district's historic towns which could have been usefully used for the Core Strategy. • Areas of Archaeological Significance should not be referred to in their current form as they do not conform with PPS5. • Any static mapping of archaeological sites will be unreliable and potentially misleading for the public within 12 months. • There are a number of known undesignated archaeological sites that are worthy of consideration for national designation. • HCC Historic Environment Unit is keen to engage in discussions with EHC to supply appropriate historic environment mapping for strategic planning and development management that conforms to PPS5 policies.
New Objective needed	<ul style="list-style-type: none"> • The protection of the East Herts Green Belt boundaries with major towns, and specifically Stevenage, to ensure no further loss of Green Belt, unless

Q9 - Summary Comment	Q9 - Detailed Comment
	<p>it is agreed as a strategic option.</p> <ul style="list-style-type: none"> • Make best use of brownfield sites • Conserve, enhance the biodiversity of East Herts • Role of countryside needs to be recognised in terms of its function of supporting biodiversity – habitats and species
Miscellaneous	<ul style="list-style-type: none"> • Quality planning input from planning officers, coping with great pressures over the years, have saved and preserved much to be proud of. Let that work continue! • Council should be protecting and furthering the interests of the residents of East Herts. • It would be a tragedy if this part of Hertfordshire were turned into an outer suburb of Greater London. • Landscape Character Assessment document on website is not legible. • People don't want to live in little boxes –they want to live in homes. • Concerned that the Planning Policy Team has ignored the effects on the Broxbourne Woods NNR and surrounding area caused by the review of the Green Belt by Broxbourne Borough Council. • There is a loophole in the current planning legislation that allows animal shelters of all size and shape to be erected in fields that have been farmed for centuries apparently with no need of permission. • Run the risk of miles and miles of shanty towns. • This issue needs addressing and regulating.
Site Specific	<ul style="list-style-type: none"> • Remove the group of existing buildings at Blyth Farm from the Green Belt.

Comments received to Q9 in respect of other issues in Chapter 2

Q9 - Summary Comment	Q9 - Detailed Comment
Theme 3: Character	<ul style="list-style-type: none"> • Policy Option should read 'Heritage protection and enhancements'. • Policy Options for Theme 4 should consider the role of the Lee Valley Regional Park. • Policy should protect the boundaries of the Park and Green Belt and the openness and high quality of the landscape. • Synergies between Green Belt and Green Infrastructure will need to be drawn out.
Theme 8: Green	<ul style="list-style-type: none"> • Important to consider the identification of additional/extended playing fields for some of the existing schools in the district. • Lee Valley Regional Park should be identified as a strategic open space and leisure asset in the Core Strategy. • Building thousands of houses and roads is not the easiest concept to present the maintenance of wildlife habitats, and water shortages in a country with high rainfall and flooding due to the mismanagement of the resource.

Comments received to Q9 in respect of other Chapters

Chapter 3: Development Strategy

Q9 - Summary Comment	Q9 - Detailed Comment
Development Strategy	<ul style="list-style-type: none">• In favour of new housing within the existing traditional boundaries of the towns and villages of East Herts but strongly oppose the attempt being made to swamp our area with new housing.

Chapter 9: Villages

Q9 - Summary Comment	Q9 - Detailed Comment
Village Plans	<ul style="list-style-type: none">• In favour of creating a separate planning document for each village, rather than lumping them into three simplistic categories.
Need for development	<ul style="list-style-type: none">• Rural areas need affordable housing and therefore improvements to public transport.

Chapter 10: North of Harlow

Q9 - Summary Comment	Q9 - Detailed Comment
Growth	<ul style="list-style-type: none">• The growth to the north of Harlow should be very restricted

Question 10: Theme 4 Policy Options (Character)

Is our approach to dealing with the policy options for Theme 4 correct?

39 people/organisations provided comments in relation to Question 10. These included:

- 10 Individuals
- 13 Developers/landowners/agents/businesses
- 8 Stakeholders/organisations including:
 - Buntingford Civic Society
 - Epping Forest District Council
 - Hertford Civic Society
 - Hertfordshire Biological Records Centre
 - Hertfordshire Gardens Trust
 - Rivers Nursery Site & Orchard Group
 - The Ware Society
 - The Woodland Trust
- 8 Town and Parish Councils including:
 - Aston
 - Benington
 - Braughing
 - Great Munden
 - Hertford
 - Stanstead Abbots
 - Thorley
 - Thundridge

Q10 - Summary Comment	Q10 - Detailed Comment
Support	<ul style="list-style-type: none"> • Generally
Disagree	<ul style="list-style-type: none"> • Policy options are so vague as to be worthless. They are not even 'options'.
	<ul style="list-style-type: none"> • Approach to dealing with the policy options completely contradicts its fine objectives.
	<ul style="list-style-type: none"> • Policy options are what one would expect to find, but they are too general and sometimes in contention.
General	<ul style="list-style-type: none"> • Policy options need to be subject to continuous monitoring and development. Will any subsequent changes be subject to consultation?
	<ul style="list-style-type: none"> • You will have to work very hard to deliver affordable, deliverable policies.
	<ul style="list-style-type: none"> • Maintaining the character of the district in all its shades will be high on all resident's aspirations.
Policy Options – Green Belt	<ul style="list-style-type: none"> • Support
	<ul style="list-style-type: none"> • Viewing the Green Belt as an absolute constraint could prevent the most sustainable development strategy for the district being established.
	<ul style="list-style-type: none"> • Policy option should recognise the need for Green Belt boundary review to accommodate housing provision.
	<ul style="list-style-type: none"> • Policy needs to ensure villages are separated from towns by suitable strips of Green Belt
	<ul style="list-style-type: none"> • Green Belt and maintaining openness should be first priority.
	<ul style="list-style-type: none"> • Challenge the Council to plan development without impacting on the Green Belt.
Location Specific – Green Belt	<ul style="list-style-type: none"> • Oppose any movement of the Green Belt boundary eastwards to enable Stevenage to expand to the east.
Policy Options – Landscape	<ul style="list-style-type: none"> • Landscape Character Assessment is crucial.
	<ul style="list-style-type: none"> • Greater clarity and detail needs to be shown on historic landscapes.
	<ul style="list-style-type: none"> • Policy should have 'traditional orchards' as a strategic element in landscape and biodiversity top themes.
	<ul style="list-style-type: none"> • Protection of these special places has to start with the top policy documents.
Policy Options – Design	<ul style="list-style-type: none"> • Policy should include minimum standards to ensure all new developments reflect the character of the surrounding environment.
	<ul style="list-style-type: none"> • Design policy should address providing integrated parking spaces for new residential developments to prevent parking on private streets.
Policy Options – Heritage	<ul style="list-style-type: none"> • Listed buildings have developed over many years and maintenance of them exactly as they were at the time of listing may not be appropriate.
	<ul style="list-style-type: none"> • Locally important heritage assets as well as those nationally listed/registered need to be included.
	<ul style="list-style-type: none"> • Sites highlighted as having the most heritage, conservation areas and scheduled monuments almost mirror those that have been suggested on your choice of options for most development.
	<ul style="list-style-type: none"> • The availability of land in an area should not be allowed to dictate the quantity and extent of development. • The fact that land is available does not mean that it is suitable for development.
New Policy Options	<ul style="list-style-type: none"> • Policy options should include the maintenance of open space within an urban setting in order to maintain the settlements character.
	<ul style="list-style-type: none"> • Policy options should deal with the protection and enhancement of the natural environment and biodiversity.
	<ul style="list-style-type: none"> • Preservation of the Rural Area beyond the Green Belt should be a separate policy option.
Miscellaneous	<ul style="list-style-type: none"> • Importance of ancient woodland and woodland creation in East Herts. • Woods need to be located near to where people live so that they can benefit from them.
	<ul style="list-style-type: none"> • East Herts Landscape Assessment Area 39 needs to be amended to specifically acknowledge the landscape value of the upper Beane valley from Watton-at-Stone to Cromer.
	<ul style="list-style-type: none"> • Social and environmental considerations must take precedence over expediency and profit.

Q10 - Summary Comment	Q10 - Detailed Comment
	<ul style="list-style-type: none"> • Too many under utilised hanger style barns and pools of livestock waste. • Site which is of great historical significance as a National Fruit Collection and has as of yet no appropriate designation. • Urge the Council to work with landowners in identifying suitable sites for development to ensure they come forward during the lifetime of the plan. • The Council should enter into early discussions with landowners/ developers to properly understand the challenges/opportunities/constraints associated with bringing forward new development on potential sites.
Site Specific	<ul style="list-style-type: none"> • GSK, Ware • Old River Lane, Bishop's Stortford

Comments received to Q10 in respect of other issues in Chapter 2

Q10 - Summary Comment	Q10 - Detailed Comment
Theme 4: Character	<ul style="list-style-type: none"> • Objectives need to take a tighter control over preserving the character and scale of rural development. • Objectives need to emphasise the responsibility of developers and developments to care and preserve, rather than to be lead simply by function and use of unsympathetic materials and styles. • CHA1 must reflect the need for some changes to the Green Belt boundary in order to accommodate the level of development required.
Theme 5: Economy, Skills & Prosperity	<ul style="list-style-type: none"> • Should be a resurgence of skills through schools and adult education to get people working in agriculture, building, craft enterprises and green technologies. • People will need to work locally rather than travel many miles to work.
Theme 7: Health, Wellbeing & Play	<ul style="list-style-type: none"> • Open space, sports and recreation facilities need to be protected.

Comments received to Q10 in respect of other Chapters

Chapter 3: Development Strategy

Q10 - Summary Comment	Q10 - Detailed Comment
Development Strategy	<ul style="list-style-type: none"> • Option E – Consider this to be inappropriate development as it negates the openness of the rural area and extends Stevenage over its natural ridge boundary.

Question 11: Theme 5 LDF Strategic Objectives (Economy, Skills and Prosperity)
Have we got the strategic objectives for theme 5 correct?

64 people/organisations provided comments in relation to Question 11. These included:

- 13 Individuals
- 30 Developers/landowners/agents/businesses
- 11 Stakeholders/organisations including:
 - Buntingford Civic Society
 - Environment Agency
 - EEDA
 - Epping Forest District Council
 - Harlow District Council
 - Hertford Civic Society
 - Hertfordshire County Council – Environment
 - Lee Valley Regional Park Authority
 - Natural England
 - National Grid Property Holdings Ltd/National Grid Gas
 - Transition Hertford
- 10 Town and Parish Councils including:
 - Aston
 - Benington
 - Braughing
 - Buntingford
 - Hertford
 - High Wych
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Walkern

Q11 - Summary Comment	Q11 - Detailed Comment
General support	<ul style="list-style-type: none"> • Support specific recognition of the importance of diversification • EEDA and Natural England supports the main thrust of the ESP approach and objectives but urge economic aims to be more specific. They are too general and sometimes in contention • Welcome taking account of parish plans in understanding EH. • Support for Gilston Great Park
General objection	<ul style="list-style-type: none"> • There should be more specific emphasis on jobs • Houses should be only for local people • ESP1 is correct and Buntingford should not surrender valuable employment land at the former Sainsbury's site to housing.
Anti- housing/and employment growth	<ul style="list-style-type: none"> • Attracting investment/providing new jobs only increases pressure for more housing. Unrealistic to try to reduce commuting by creating high-value jobs as London will remain. It will only result in more people and activity in an already over-crowded area. • Should maintain employment prospects of existing population only. • Should focus on Green Belt retention and conservation, reduce volume of all types of development.
Link to housing growth	<ul style="list-style-type: none"> • New job creation should be linked to house building and vice versa. Current evidence and approach is unclear. • New housing and job creation needs to take account of impact of existing under-supply of housing and resultant high prices on the competitiveness of business in terms of the cost of labour. Low affordability of housing results in low job creation. • GSK supports objective ESP1 to attract new investment, balance new housing and create high-value jobs through delivering appropriate business infrastructure and employment sites.
High cost housing attracts business investment	<ul style="list-style-type: none"> • Towns like Buntingford need to provide housing to support maturing professionals (not high-density starter-homes) so they will be encouraged to locate and set up businesses in the town.
Quality environments attract investment	<ul style="list-style-type: none"> • The quality of the environment is a significant factor in attracting business and high-value skilled jobs. • Emphasis should be shown as to how different locations possess different opportunities for attracting investment that are shaped by each location containing different mixes and patterns of services, facilities and infrastructure.
Employment Land distribution	<ul style="list-style-type: none"> • New employment land should be spread amongst the whole district. Just because historically Hertford has a large number of employers this does not mean it the town is resilient to economic changes particularly if these employers are public sector. • Historical development has changed the face of EH towns, with employment land focussed in the south turning southern parts of the district into dormitories of London and surrounding larger towns • Need to consider the proximity of employers in neighbouring districts who offer significant employment for EH residents (GSK, MBDA, Astrium etc). • Need to cooperate with neighbouring authorities over employment land location. Establish a Partnership and LEP. • Employment locations can be sustainable even where they do not fit into a chosen development strategy. • Jobs should be in the locations people live – commuting should not be needed. • Existing vacant land and units should be considered when promoting new employment sites and considering diversification of rural areas. • Should refer to Halcrow Employment Land Study.
Loss of land	<ul style="list-style-type: none"> • Huge pressure to redevelop land for housing particularly in sites close to town centres • Housing developments on parts of employment land lead to the unsustainability of remaining employment land and resulting in ghost estates only habitable for commuters as local jobs have gone.

Q11 - Summary Comment	Q11 - Detailed Comment
	<ul style="list-style-type: none"> • ESP 1 should include <i>'protection of suitable existing employment sites'</i> in addition. • It is not an option to pursue a policy of 'managed decline' when government policy is to place economic growth at the heart of planning.
Supports reduction of employment land	<ul style="list-style-type: none"> • Should include a policy which would allow the flexibility for vacant/under-used employment sites to come forward for redevelopment for alternative uses where appropriate, including housing, provided this does not prejudice the business activities of remaining occupants.
Major Developed Sites/ major employers	<ul style="list-style-type: none"> • Site-specific proposal for Hayter's in Spellbrook – Core Strategy should continue to allow flexibility on MDSs in the GB to allow for partial residential development to make remaining employment use more viable. Loss of large employers would be bad for EH economy. • There may be difficulty, where a large site is under specific use, to convert the land to other occupiers should the original occupier move (Hayters, Terlings Park e.g.) • Objectives conflict: you cannot seek to retain employment opportunities by protecting existing sites and encourage investment where physical constraint policies seek to protect the site and its environs, i.e. preventing expansion and development of sites in the GB. • In order to fund relocation/expansion they would need to redevelop existing land for housing.
Infrastructure	<ul style="list-style-type: none"> • Need to recognise the importance of appropriate transport
Type of jobs	<ul style="list-style-type: none"> • GSK supports objective ESP1 to attract new investment, balance new housing and create high-value jobs through delivering appropriate business infrastructure and employment sites. • Should look for a range of jobs – heavy/light manufacturing as well as high-value skilled jobs. Mixed uses should be encouraged. • Need to encourage and support rural jobs and crafts. • Should work in partnership with other districts and the county to establish a LEP.
Rural economy	<ul style="list-style-type: none"> • Rural diversification needs to be greater than just farm business diversification. Need to encourage and support rural jobs and crafts. • Need to support and retain all available agricultural land to encourage food self-sufficiency/mitigate climate change etc. • Larger service villages and even the smallest village can be in a sustainable location. ESP2 should add <i>"...by enabling diversification and rural economic growth..."</i> supported by 2010 State of the Countryside Report and para1.17 of the White Paper 'Local Growth, Realising Every Place's Potential'. • Should strengthen village rather than urban communities by encouraging small locally serviced office and industrial units to provide rural employment and incubation potential. • Should encourage community-run enterprises and mobile traders. • Parishioners should have a greater say as to whether rural diversification projects are suitable for a village
General Rural area	<ul style="list-style-type: none"> • Transition Hamlet model is appropriate model - 2 acres homes and workshops surrounded by 6/7 acres productive land and natural woodland linked by green links
Forecasting	<ul style="list-style-type: none"> • Need to use latest available economic forecasting Models • Could have sought opinions on potential need/value of strategic employment sites. Could also use forthcoming Hertfordshire Strategic Employment Sites Study due early 2011 • Policy decisions need to be based on forecasts, policy aspiration and deliverability
Sustainable Economy	<ul style="list-style-type: none"> • No reference to the importance of a low carbon economy to the future economy of the district. Reference should be made to the White Paper on Local Growth which refers to 'green growth' and the 'green economy'. • Need to support and retain all available agricultural land to encourage food self-sufficiency/mitigate climate change etc. • Economic and social considerations are of equal importance to environmental

Q11 - Summary Comment	Q11 - Detailed Comment
	concerns. Often there is too narrow an approach to sustainable development based on transport orientated accessibility.
Retail Town Centres – Allow change to non-A1	<ul style="list-style-type: none"> • Correct in that the CS follows national policy in promoting vitality and viability of town centres. However, there should be enhanced consumer choice through innovative and efficient shopping, leisure, tourism, and local facilities, art galleries and museums. • The approach to town centres should change to reflect changing economic circumstances and patterns of retailing. STC2 is outmoded in not permitting other than A1 uses.
Retail Town Centres – Retain all land for economic activity.	<ul style="list-style-type: none"> • Land in town centres and high streets should be retained for economic growth not for residential (particularly Hertford and villages). • Should cater for daytime and night-time activity and a welcoming attitude to the motorist. Need to maintain vitality despite growth of supermarkets.
General retail development	<ul style="list-style-type: none"> • Need to refer to Retail Study which highlights the need to develop B.S town centre and to allocate land for major retail development. • Need to fill the policy gap between economic development outside town centres and within in rural areas. • Policy should provide for non town centre retail delivery to meet local business and community needs to maintain viability. • Support for Van Hages Garden Centre to be allocated for future economic development.
Retail Parks	<ul style="list-style-type: none"> • There is a saturation of large retail parks in the sub-region causing harm to high streets. Policies should prevent these.
Pro Stansted Airport	<ul style="list-style-type: none"> • Nearly a quarter of Stansted employees live in EH with a potential contribution of £50million to the EH economy based on average earnings of £23,400. So Airport has a positive economic influence as an accessible workplace to those living in B.S, Sawbo and Harlow. • Should make more advantage of opportunities for economic growth offered by a growing Stansted Airport and international business, tourism etc.
Anti Stansted Airport	<ul style="list-style-type: none"> • Proximity to Stansted Airport brings safety issues not necessarily tourism
Pro Harlow Growth	<ul style="list-style-type: none"> • All of Harlow Council's submission, joint working, cross-boundary reliance and benefits etc
Anti-Harlow	<ul style="list-style-type: none"> • Requirement for growth North of Harlow does not exist. To do so would be to desecrate valuable and beautiful rural landscape.
Education and School growth	<ul style="list-style-type: none"> • Objectives do not tackle issues such the need for a new school in Bishop's Stortford. • Education is a significant issue and should be given a greater priority with its own objectives. What educational needs are to be met? • Need to recognise educational opportunities provided in neighbouring districts, i.e. Harlow • HCC Property supports ESP4 which supports educational needs by encouraging the provision of new facilities and infrastructure in appropriate locations. • Hertford Regional College supports ESP4 and wants to work in partnership to help complete its redevelopment of its Ware Campus due to funding shortfall. Key link between standard of education facilities and achievement. Possible receiver of S106. • Need to encourage teaching of skills in new technologies and changing economic world. 'Peak Oil' is an opportunity to get people working in agriculture, building, craft enterprises and green technologies. • Education is good but there may not be the jobs available in EH. • When classifying larger service villages need to take into account capacity of facilities.
Pro Bishop's Stortford	<ul style="list-style-type: none"> • Bishop's Stortford's importance as a commuter town is under-rated.
Evidence base	<ul style="list-style-type: none"> • Need to use more up-to-date evidence not 2001 census.
Tourism	<ul style="list-style-type: none"> • Careful consideration needed as to what appropriate tourist facilities are, what tourism do we wish to offer and what type of tourist do we want to attract.

Q11 - Summary Comment	Q11 - Detailed Comment
	<ul style="list-style-type: none">• Links to type of offer available in town centres and rural areas• Lee Valley Regional Park and its plans offers strategic benefits to tourism, GI and green economy. Policy should seek to support sustainable tourism.

Question 12: Theme 5 Policy Options (Economy, Skills and Prosperity)

Is our approach to dealing with policy options for theme 5 correct?

41 people/organisations provided comments in relation to Question 12. These included:

- 9 Individuals
- 19 Developers/landowners/agents/businesses
- 6 Stakeholder/organisations including:
 - Bishop's Stortford Civic Federation
 - British Waterways
 - Epping Forest District Council
 - National Grid Property Holdings/National Grid Gas
 - The Ware Society
 - Transition Hertford
- 7 Town and Parish Councils including:
 - Aston
 - Great Munden
 - Hertford
 - Stanstead Abbots
 - Thorley
 - Thundridge
 - Watton-At-Stone

Q12 - Summary Comment	Q12 - Detailed Comment
General support	• Support for Gilston Great Park
	• Seems appropriate
	• Welcome the use of parish plans in understanding issues of EH
General objection	<ul style="list-style-type: none"> • Laudable but very broad and generic – need to be specific now • Sometimes in contention
Link to housing growth	• Job provision should be linked to housing targets
Employment Land distribution	• Should be directed to large settlements to reduce need to travel, and contribute to maintaining viability and self-sufficiency of local communities, inc rural. (Stanstead Abbots recommended)
	• Should retain and restrict additional employment land for employment purposes
	• Maximise potential for waterside development in towns for mixed uses in attractive environment.
	• Policy needed for managing existing stock: needs to be deliverable up to 2031; should not prohibit development and investment, allows for a wide range of employment generating uses; allows for other uses to come forward on sites that are not attractive to the market.
	• Should allocate specific land (for strategic growth purposes), this would encourage retention and relocation of existing employers within the district, freeing up other sites for other uses
	• This would allow some PDL to be used for short-term housing need, delaying need for greenfield sites (Hertford recommended), with balance of employment land being made up later (<i>but where would replacement employment land go??</i>)
	• New sites should not compromise existing sites
	• Consultation with landowners/developers necessary to ensure deliverability of policy designations
	• Should provide support for and encourage working from home
	• Sites should not have to prove they have been vacant / un-marketable for a long period in order to be released. Policy should be modified. Property agent could be used to predict suitability of sites in the market and allocate land accordingly. Oversupply of employment land Update employment land review.
Rural economy	• Add an option covering the approach to rural economic growth
	• Small and medium enterprises more suitable to the type of settlements in EH. Does not have the infrastructure to support large enterprises.
	• Rural diversification will need vastly improved electronic infrastructure. Wide area wireless networks ideal for retro-fitting rural communities.
	• Support working from home
Retail	• CS should define a retail hierarchy in its towns, with town centre boundaries allocated, with reference to retail need identified in RTC 2008 study.
	• Retail and leisure are major employment generators and should not be treated separately from employment land and economic development
	• Need an approach to retail locations outside town centres and in high streets
	• Should resist changes of high street retail to residential to maintain vitality and viability
Town character	• Each towns should be protected to preserve and enhance individual characteristics
Education	• Strategy should take account of need for, capacity of existing, and the ability of HCC to provide additional education facilities in both urban and rural locations. Particularly when classifying villages. Land should be allocated to accommodate education.
	• Should not be prescriptive about private education provision, which could negate the governments intentions
Employers	• Recognise the contribution of larger employers both within and outside EH, urban and rural and to allow flexibility to retain them
	• Should maintain, encourage and support small businesses,
	• Should maintain diversity of small businesses and not concentrate jobs market

Q12 - Summary Comment	Q12 - Detailed Comment
	on few large employment centres
Type of jobs	<ul style="list-style-type: none"> • Need to determine what sort of jobs we want and how to attract it. • Take into account service industry jobs.
Infrastructure	<ul style="list-style-type: none"> • Infrastructure provision should precede development
Miscellaneous	<ul style="list-style-type: none"> • Assumes structure of the economy in 2031 will be the same as 2010 just bigger. Transition settlement model offers an alternative model to self-sufficiency and resilience against global changes • Provide appropriate health facilities in urban and rural areas

Question 13: Theme 6 LDF Strategic Objectives (On the Move)
Have we got the LDF strategic objectives for Theme 6 correct?

54 people/organisations provided comments in relation to Question 13. These included:

- 14 Individuals
- 19 Developers/landowners/agents/businesses
- 11 Stakeholders/organisations including:
 - Epping Forest District Council
 - Essex County Council
 - Haileybury School
 - Harlow District Council
 - Hertford Civic Society
 - Hertfordshire County Council – Environment
 - Highways Agency
 - National Grid Property Holdings/National Grid Gas
 - Natural England
 - The Ware Society
 - Transition Hertford
- 10 Town and Parish Councils including:
 - Aston
 - Bayford
 - Hertford Heath
 - Hertford Town
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Walkern
 - Ware
 - Watton-at-Stone

Q13 - Summary Comment	Q13 - Detailed Comment
Support Objectives	<ul style="list-style-type: none"> • Support
	<ul style="list-style-type: none"> • Broadly correct
	<ul style="list-style-type: none"> • Support, but are they achievable
	<ul style="list-style-type: none"> • Objectives are good – but are aspirations only until detailed, costed and resourced.
	<ul style="list-style-type: none"> • East Herts consists of dispersed towns and villages. Car dependency is high & often viewed as the only viable travel option. Poor transport limits opportunities to access employment as well as services and facilities. Agreed that a reliable, efficient and above all, sustainable, transport system is essential to help achieve a strong local economy. Aim to reduce car dependency, while ensuring that current and future access needs are met through improving passenger transport, walking, cycling, and other sustainable modes of travel as detailed in paragraph 2.9.8 is supported.
	<ul style="list-style-type: none"> • Important that objectives are supported by ensuring an appropriate mix of employment and residential development sites, in accessible locations in the smaller towns such as Sawbridgeworth (such as at the Thomas Rivers site).
Amendments to Objectives Sought - General	<ul style="list-style-type: none"> • The objectives are appropriate for local issues and in tune with making the District more self sufficient in employment. However, major problems are traffic traversing East Herts and commuting into London and to nearby industrial conurbations.
	<ul style="list-style-type: none"> • The transport strategy should include the encouragement of alternative means of transport including car share schemes and community buses.
	<ul style="list-style-type: none"> • It is important when using passenger transport provision that journey reliability is consistent and a key factor in determining the method of travel.
	<ul style="list-style-type: none"> • Over emphasis on walking and cycling fails to adequately acknowledge the ageing population unable to adopt these modes of transport and to whom the car is often essential
	<ul style="list-style-type: none"> • No mention of new dedicated cycle paths and footpaths. Need to revise Right of Way - vehicular traffic must be banned from footpaths/bridleways/Public Rights of Way. Community transport - make this free to all users via Council Tax - it then is economically sensible for all to use it.
Object to Objectives	<ul style="list-style-type: none"> • Not enough emphasis has been placed on addressing car park issues.
	<ul style="list-style-type: none"> • Words need to be stronger/more specific
	<ul style="list-style-type: none"> • OTM1 to 6 are so vague as to be worthless. It is essential that the infrastructure of say, Bishop's Stortford, is improved before any further development takes place. For example, a south-east bypass is urgently required. Hertford also has a major problem.
	<ul style="list-style-type: none"> • Both Objectives and Policy Options are as expected, but are too general and sometimes in contention.
OTM1 Support	<ul style="list-style-type: none"> • Fail completely to recognise the use of quieter roads and lanes in the sole pursuit of recreation. Large numbers of cyclists, walkers and horseriders on such lanes. These cyclists come from all over and add considerably to the locally economy of cafes and pubs. The roads used need greater protection from mechanised vehicles. Conversely cyclists and horseriders need to be encouraged away from main roads.
OTM2 Support	<ul style="list-style-type: none"> • Support
	<ul style="list-style-type: none"> • Support
	<ul style="list-style-type: none"> • Embodies fundamental principle of sustainable development/modal shift/minimising need to travel
	<ul style="list-style-type: none"> • If policy successful some residents will live at their destination and travel nowhere. Common sense keeps coming back to concentrated development.
	<ul style="list-style-type: none"> • Future developments should be of sufficient scale and in right location to enable the delivery of strategic infrastructure. Concentrating development ensures critical mass is achieved to support new infrastructure. Dispersing development, where the existing infrastructure is already at capacity, will only exacerbate the situation

Q13 - Summary Comment	Q13 - Detailed Comment
	<p>with insufficient funding for infrastructure improvements.</p> <ul style="list-style-type: none"> In accordance with PPS4 and PPG13, support the location of town centre uses in central locations where it minimises the need to travel to key services and facilities. Mixed use development is recognised for its potential to provide significant benefits in terms of promoting vitality, viability and diversity (paragraph 30, PPG13).
Amendments to Objectives Sought – OTM 2	<ul style="list-style-type: none"> To recognise that it is not merely the location of development which makes it accessible to services OTM2 should be redrafted: “To plan development in order that it will be easily accessible to key services and facilities such as employment, education, healthcare, retail and recreation.” OTM2 should be re-drafted to read: - "To locate development where it will minimise the need to travel to key services and facilities such as employment, education, healthcare, retail and recreation; whilst recognising that this will be more difficult to achieve in rural areas where development may be required to meet the social and economic needs." Objective should also refer to the need to locate development where it will not exacerbate existing congestion issues. OTM2 seems to militate against villages unless transport can be improved substantially – employment will be focussed on larger towns It is important that objectives do not simply repeat national guidance/policy. The objectives should refer to precise places to provide a spatial expression.
OTM2 not achievable	<ul style="list-style-type: none"> Not all development can be located where it is directly accessible to services Reducing parking facilities will not reduce the need or engender 'modal shift' to sustainable transport.
OTM2 Object	<ul style="list-style-type: none"> OTM2 as currently drafted will deny a sustainable future for Smaller Service Villages, Other Villages and the rural area generally. Accessibility, whilst an important aspect of sustainability, is not the only definition of sustainable development set out in PPS1. Environmental matters are not restricted to reducing carbon dioxide emissions from the private car. Limiting development in locations accessible only by the private car neglects the economic and social needs of Smaller Service Villages and Other Villages and contributes directly to exacerbation of social and economic problems in rural areas, in particular acute housing affordability and other issues detrimental to community.
OTM3 Support	<ul style="list-style-type: none"> Support Embodies fundamental principle of sustainable development
Amendments to Objectives Sought – OTM 3	<ul style="list-style-type: none"> OTM3 is admirable, but how will it be achieved? Must accept level of public transport that can be provided to rural communities will not produce significant decrease in private car use. Council underestimates how many people are reliant on their car and that parking will always be needed to avoid residents parking on private streets and blocking existing premises.
Amendments to Objectives Sought – OTM 4	<ul style="list-style-type: none"> Needs to encourage more car parking at stations.
Amendments to Objectives Sought – OTM 5	<ul style="list-style-type: none"> There will never be any significant take up of walking and cycling as modes of transport in rural areas except locally within village centres. But villages attract cycling and walking recreational traffic from the nearby towns.
Amendments to Objectives Sought – OTM6	<ul style="list-style-type: none"> OTM6 is not preceded by any text relating to the perceived or actual negative effects of aviation development and operation on the district. No disagreement that the airport gives rise to adverse effects and that these need to be managed and mitigated, but reality is that adverse impacts such as airport related car parking effect only very small parts of the Districts. OTM6 is considered one sided given overall important and positive role Stansted plays in facilitating access locally and internationally, and in providing jobs local to many of the district's residents and supporting sustainable travel patterns.

Q13 - Summary Comment	Q13 - Detailed Comment
	<ul style="list-style-type: none"> In access terms Stansted contributes positively to the transport network in the District and facilitates sustainable travel patterns and reduced car dependency for residents and employees of the district. Objective should be phrased positively to maximise and realise opportunities presented by the Stansted Airport to support sustainable travel patterns within the District and reduce congestion.
Miscellaneous	<ul style="list-style-type: none"> More effort should be made to understand why people travel. More people should work from home. Golf carts should be used for local travel as more sustainable and could run on cycle ways, particularly those in Stevenage. Could provide cycle ways from surrounding villages and free parking for golf carts in the town. East/West Travel is of great significance to Hertford and East Herts. Improved east/west routes were considered important both for the traveller and the communities along the route. Hertford currently suffers greatly from the limitations of the A414 and the inability to travel east/west by rail. The Town Council would ask that serious consideration be given to the construction of a largely tunnelled route for motor vehicles and possibly also a light railway from the A414 junction at the Great Amwell roundabout area to a point beyond Cole Green. (Note: Whilst asking that consideration be given to the proposed route, the Council was not necessarily advocating the idea at this point). East-west routes, both the A414 and Stevenage - Buntingford need to be addressed. There is no satisfactory transport link from East to West in this area. Locations outside EHDC (wide range of employment, services and facilities exist) provide good opportunity to maximise benefits of more sustainable modes of transport. 2.9.9 introduces North Harlow not only unnecessarily, but providing an excellent example of proposed development without any new infrastructure Map refers to road traffic congestion hotspots but not to rail passenger congestion. St Margarets station should be highlighted as significant number of users of this line start journeys from this station and trains at peak rush hour are packed to capacity. Capacity on this line is limited as it is a branch line and is single track in places. 2.9.10: the problem of peak crowding on trains is very serious and needs to be addressed urgently. Reduction of affordable parking at railway stations (which also serve outlying villages) significantly increases the on street parking problem. Figure 2.6 – Local bus services are described as 'frequent'. Appendix D showing local bus service timetables may be grammatically correct but would be more informative if frequency were given Stanstead Abbots is recorded as having "frequent bus services". This does not portray a fair assessment of the bus services where there is no Sunday service and services on other days are limited (6am to 7pm). It is highly impractical to reach major towns (Stevenage, Welwyn, Watford or Bishops Stortford) by public transport, and not possible to reach Harlow and Waltham Cross directly outside the limited hours of the bus service. OTM3 refers to addressing car parking issues and section 2.9.10 refers to the lack of realistic alternatives to car ownership. The feasibility of developing car clubs and park-and-ride schemes should be fully assessed. Development of a car club in partnership with a local council (including parking bays reserved for car club cars) is demonstrated to reduce car use and space required for parking and reduce ownership and running costs (e.g. see examples in Bath, Highgate and Islington). Disappointment at the generally negative connotations made about Stansted Airport given, as recognised in the plan, the central role travel plays in all our lives and given the important transport benefits which Stansted brings. CS identifies Buntingford as one of 6 main settlements, putting it on a par with Bishop's Stortford, Hertford or Ware. This does not fairly reflect Buntingford's size and its relative physical, environmental and socio - economic constraints. Town

Q13 - Summary Comment	Q13 - Detailed Comment
	<p>centre has no railway station and is heavily reliant on surrounding larger towns to provide necessary services and amenities. Buntingford is also heavily reliant on two main bus services to surrounding larger towns, therefore it is inevitable that existing and future residents will have a higher reliance on private cars.</p> <ul style="list-style-type: none"> • Need to encourage walking, cycling and large village town paths to reduce motorised traffic and use the hardened footpath and byway network. • Cycle lanes needed - proper ones, not painted lines on roads. • Travel on rural roads increasingly dangerous • Need to improve road maintenance – HCC • If development to take place in East Herts, existing road infrastructure needs significant improvement, as already overstretched. Improvement must occur before development in place - and should be funded by the developers. • Public transport needs to be extended in villages and operate at times appropriate for commuters. • Policies should seek to ensure the following issues are addressed with respect to future growth at Harlow Inter-urban transportation connectivity: <ul style="list-style-type: none"> ○ Accessibility to Harlow town centre and employment sites from East Herts; ○ Accessibility within Harlow from the proposed North Harlow; ○ Public transportation accessibility; ○ Inter-urban transportation connectivity; ○ Freight movements; ○ Walking and cycling networks within the proposed urban extension at North Harlow; and ○ Parking issues. • Dependency on commuting is a serious issue. It is noticeable that many small industrial areas providing local employment have been allowed to be replaced by housing making the commuting issue even more critical. • Comments by others on use of quieter roads/main roads are more appropriate to HCC's LTP consultation. • The Highways Agency is keen to be involved in any discussions that may take place between East Hertfordshire District Council and Hertfordshire County Council on developing a transport evidence base which is capable of identifying any potential problems which may occur on the strategic road network.
Critique of consultation	<ul style="list-style-type: none"> • Sketches showing data of 'daily trips' in and out of Bishop's Stortford, Buntingford, Hertford and Ware are provided. It appears this information is 10 years out of date being based on the 2001 Census. How can any future planning be performed with confidence with such outdated information?

Comments received to Q13 in response to other issues in Chapter 2

Q13 - Summary Comments	Q13 - Detailed Comments
Policy Options	<ul style="list-style-type: none"> • The policy options (3rd bullet) for the Core Strategy to deal with that are set out in paragraph 2.9.12 could usefully refer to locating development where it does not exacerbate existing congestion issues. Existing congestion locations are identified in Figure 2.1. Other congestion hotspots not shown on that map are identified in 'Tackling Congestion in Herts'. • The Hertfordshire Infrastructure and Investment Strategy also contains a series of diagrams which indicate where roads within the district may experience capacity issues at the growth rates contained within the approved East of England Plan. • Future Highways & Transport policies need to reflect policies in LTP Long Term Strategy. Current Local Plan Policies are weak in highways terms and not easy to use/defend refusals at inquiry.
Subsequent LDF documents	<ul style="list-style-type: none"> • Some of the strategy documents identified in 2.9.13 will already be produced under the LTP and work should not be duplicated.
Transport Responsibility	<ul style="list-style-type: none"> • Concerns about spread of responsibility for transport amongst different authorities/agencies. No one body appears to have overall responsibility; reliance

Q13 - Summary Comments	Q13 - Detailed Comments
	upon co-operation dilutes efforts to meet objectives.

Comments received to Q13 in respect of other Chapters

Chapter 1: Background and Context

Q13 - Summary Comment	Q13 - Detailed Comment
Sustainability Appraisal	<ul style="list-style-type: none"> A more robust and comparative sustainability appraisal needs to be undertaken to support the proposed locations for new growth.

Chapter 3: Development Strategy

Q13 - Summary Comment	Q13 - Detailed Comment
Green Belt	<ul style="list-style-type: none"> Important to recognise that achieving development in the most sustainable locations may involve revisiting Green Belt boundaries.
Growth	<ul style="list-style-type: none"> The main large towns in the District (Bishop's Stortford, Hertford and Ware) should accommodate the greatest levels of future growth as they are the most sustainable locations. Further consideration needs to be given to the capacity for growth at settlements like Stanstead Abbots and St Margaret's, which performs well in relation to sustainability criteria, whilst Buntingford does not. More homes, more people, more traffic. This issue to be addressed before any future developments take place. Sustainable settlements, such as Stanstead Abbots, with reasonable level of facilities and access to public transport should be identified for further development to build on the existing success of the settlement and reinforce it for the future. Highways Agency can no longer be expected to cater for unconstrained traffic growth generated by new development and we therefore encourage development policies and proposals which incorporate measures to reduce traffic generation at source.
Site specific	<ul style="list-style-type: none"> Hertford Police Station which is a brownfield site in the town centre in proximity to public transport a developer meets the criteria of growth option 1.
Housing	<ul style="list-style-type: none"> Suggest that the options for locating housing should be reconsidered so as to better reflect OTM2 & OTM3 objectives. For instance, Stanstead Abbots and St Margarets performs well in relation to these criteria, while Buntingford does not; however, Buntingford is accorded a status akin to the District's main towns, while Stanstead Abbots and St Margarets are given a similar status to relatively smaller and less sustainably located villages such as High Cross.
Sustainability objectives	<ul style="list-style-type: none"> Many of the options for locating future housing do not accord with the proposed sustainability objectives in OTM2 & OTM3.
Option F	<ul style="list-style-type: none"> Additional disadvantage of option F could be that development on transport corridors might attract a disproportionate number of commuters moving in to East Herts from outside the district and Stanstead Abbots becomes a dormitory village, adversely impacting its character.

Chapter 5: Buntingford

Q13 - Summary Comment	Q13 - Detailed Comment
Suitability	<ul style="list-style-type: none"> The appropriateness for Buntingford to accommodate major levels of growth is questioned as it is not as sustainable as other settlements in the District, which are served by railway stations. Buntingford's great asset is that it is not a railway town and can become a self-contained community if job opportunities and homes are balanced.
Growth	<ul style="list-style-type: none"> Growth options at Buntingford should be limited to brownfield redevelopments as much as possible. If further sites are still necessary other opportunities close to the town centre should then be considered but not green field proposals such as land

Q13 - Summary Comment	Q13 - Detailed Comment
	west of Ermine Street/Corneybury Farm which will inevitably only further encourage the use of private cars and will be less sustainable than other alternative sites.

Chapter 9: Villages

Q13 - Summary Comment	Q13 - Detailed Comment
Accessibility	<ul style="list-style-type: none"> Support recognition at 9.3.10 that Larger Service Villages have good accessibility and could act as a focus for growth.
Development	<ul style="list-style-type: none"> Allowing <u>limited</u> development in villages (larger and smaller) would benefit transport companies which cover less populated areas. An increase in the people residing in the villages is more likely to encourage the transport companies to offer better services. Further development in the villages will make the roads more dangerous and the environment less attractive, encouraging recreational pursuits to go further afield with an increased carbon footprint. HA - Careful consideration should be given to scale of development in rural areas, access to key services, jobs and public transport, and current operation of transport infrastructure in areas where planned growth may occur. Residents of new development should have the choice of travelling by attractive non-car modes of transport to reduce car dependency. Should not be undue reliance on making long distance journeys potentially via the strategic road network.
Sustainability trap	<ul style="list-style-type: none"> Paragraph 9.3.10 proposes that "Perhaps one solution will be to focus development at those larger villages that have good accessibility or potential accessibility in terms of passenger transport." This fails to address the needs of the vast majority of rural settlements that are not 'Larger Service Villages', and leads directly to the issue of the 'sustainability trap' as defined in the Taylor report (p26).

Question 14: Theme 6 Policy Options (On the Move)

Is our approach to dealing with the policy options for Theme 6 correct?

41 people/organisations provided comments in relation to Question 14. These included:

- 10 Individuals
- 17 Developers/landowners/agents/businesses
- 8 Stakeholders/organisations including:
 - British Waterways
 - Broxbourne Borough Council
 - Epping Forest District Council
 - Haileybury School
 - Harlow District Council
 - National Grid Property Holdings/National Grid Gas
 - The Ware Society
 - Transition Hertford
- 7 Town and Parish Councils including:
 - Aston
 - Bayford
 - Great Munden
 - Stanstead Abbots
 - Thorley
 - Thundridge
 - Watton-at-Stone

Q14 - Summary Comment	Q14 - Detailed Comment
Support	<ul style="list-style-type: none"> • Support • Entirely supportable but very generic. It will not turn into reality until it has been detailed, resourced and costed, when without doubt it will not be all affordable
Object to Policy Options	<ul style="list-style-type: none"> • Both Objectives and Policy Options are as expected, but are too general and sometimes in contention. • The lack of identified activities makes it difficult to comment on the proposed approach to dealing with the policy options.
Policy Options Amendments Sought	<ul style="list-style-type: none"> • Principles as set out are logical but more detail is required on some of the suggested policy options (e.g. "mode hierarchy principles"), otherwise they may be considered meaningless.
2.9.12 Support	<ul style="list-style-type: none"> • Development needs to be in places where sustainable travel choices can be made. • Support policy promoting development accessible by different modes of transport.
2.9.12 Amendments Sought	<ul style="list-style-type: none"> • Final bullet point should seek to 'improve <u>and maintain</u> accessibility to key services and facilities'.
2.9.12 Object	<ul style="list-style-type: none"> • Locating development in places where sustainable travel choices can obviously be made will ensure it is centred on the 5 towns or major transport routes. This is not necessarily the right way forward.
2.9.13 Support	<ul style="list-style-type: none"> • Support certain aspects of OTM2 being dealt with in subsequent DPDs
Future Policy Options	<ul style="list-style-type: none"> • Policy options that relate to the airport that would benefit from inclusion in subsequent LDF documents: Support the need for new developments to address cycling provision, pedestrian provision, public transport improvements and travel planning as well as where necessary contributing towards new infrastructure. • Policy options that relate to the airport that would benefit from inclusion in subsequent LDF documents: Support a policy that development of facilities directly related to the operations of the airport should be provided at the airport, and that this should include resisting proposals for airport related car parking in the District. • Policy options that relate to the airport that would benefit from inclusion in subsequent LDF documents: Support a policy that resists new noise sensitive development in areas exposed to undesirable levels of noise including that from the current and future planned operation of Stansted Airport. • Consideration should be given to alternative transport facilities including car sharing/car club schemes. • Policy options should recognise the need for improved public transport provision, particularly within the rural areas. • Consideration should be given to alternative transport facilities including park and ride schemes. • Consideration should be given to alternative transport facilities including community buses. • Need to add policies e.g. electric cars. • Maximising the use and potential of the waterways and towpaths can clearly contribute to policy options linked to 6 objectives, especially in enabling sustainable transport and creating development that is accessible by different modes of transport. The alignment of the Lee and Stort with the four major towns in the District really enhances the opportunities since most of the population of the towns and most of the proposed new homes will be close to the waterways. • Paragraph 2.9.13 states that cycling provision and pedestrian provision should be dealt with in subsequent LDF documents. We would hope that these are provided soon and we would be keen to be involved in their preparation. • Core Strategy should include policy options that provide for the sustainable growth of rural areas, with 'sustainable' defined as meeting social, economic

Q14 - Summary Comment	Q14 - Detailed Comment
	<p>and wider environmental goals (rather than being limited to just the need to reduce CO2 emissions from the private car).</p> <ul style="list-style-type: none"> Broadly support objectives to enhance sustainable modes of transport as described in Theme 6 but request that any contributions towards transport improvements should be based on impact and scheme viability, taking into consideration issues such as proximity to public transport, proposed transport elements as part of the scheme and mix of uses etc. Also would urge implementation of reduced car parking standards, particularly on sites in proximity to public transport in order to promote sustainable forms of transport. This will ensure delivery of transport improvements whilst not jeopardising the delivery of the development proposals.
Miscellaneous	<ul style="list-style-type: none"> All prior and laudable aims for bicycles will <u>never</u> be a feature on English (East Herts) roads until they are given equal status with car borne travel (see Holland). Cycling provision is at present very poor. Narrowing roads by drawing a line down the side as a cycle track is totally inadequate. Byways and bridleways must have better surfaces if they are to be used as cycle paths. Local <u>reliable</u> transport is important. Bus timetable revisions suggested where services covering in part the same ground, running with only a short time between the two services, then followed by a longer wait. More regular services <u>might</u> encourage more use. While many of the LDF Strategic objectives for transport are admirable-reducing car use, improving public transport services etc, it is difficult to see how these marry with development in the villages. Building in the villages will lead to greater car use and dependency, contradicting objectives to reduce carbon emissions and combat climate change. On page 51 Figure 2.1 Bus and Rail Routes in East Herts shows local bus service, along the B1368, as a 'frequent service'. At peak times, buses run barely once an hour, and after 8.30am one can wait two hours. There are no buses after 8.30 pm and no service on Sundays. Its unreliability and infrequency mean that it can never be relied upon for keeping doctors' appointments, or making train connections. Those coming home late from nearby towns must take a taxi or get a lift. Stanstead Abbots is recorded as having "frequent bus services". This does not portray a fair assessment of the bus services where there is no Sunday service and services on other days are limited (6am to 7pm). It is highly impractical to reach major towns (Stevenage, Welwyn, Watford or Bishops Stortford) by public transport, and not possible to reach Harlow and Waltham Cross directly outside the limited hours of the bus service. Transport. Building more houses in a village [Aston] where the last bus comes at 16.11pm is hardly going to see a decrease in traffic within this rural area. There is no way that people working outside the area can get into or out of Aston without a car, particularly at peak times. The A1M is virtually blocked each morning and evening with the weight of traffic. The increase in houses will bring more misery for commuters. Should the A1M be on a road widening programme, and quickly, before you consider putting more traffic on it? No mention about Park and Ride schemes proposed recently for Hertford/Ware.

Comments received to Q14 related to other issues in Chapter 2

Q14 - Summary Comment	Q14 - Detailed Comment
Key Issues & Vision	<ul style="list-style-type: none"> Support

Theme 3: Housing	<ul style="list-style-type: none"> STAL does not wish to comment specifically on the strategy for providing housing across the district other than to note that the proximity of the airport as a likely key employment location for future residents and access to it via public transport services should be a factor considered in arriving at the preferred development strategy, along with noise impacts of the airport (for which comments are made below in response to Question 24 on the options being considered at Bishop's Stortford.
Theme 5: Economy, Skills and Prosperity	<ul style="list-style-type: none"> Although no specific questions are asked about job numbers and potential allocations the employment section in the section on Development Strategy acknowledge the potential opportunities in Harlow, Stevenage and the Lee Valley but fails to acknowledge the contribution Stansted Airport can make to meeting future employment needs of the District's residents. Stansted is an accessible and convenient location especially from Bishop's Stortford, and the northern and eastern parts of the Borough. The existences of the employment opportunities presented by the airport have been overlooked and should be a factor determining the need and distribution for employment land in the Core Strategy.
Theme 6: On the Move	<ul style="list-style-type: none"> Particular Support
	<ul style="list-style-type: none"> While it is accepted that road development is the responsibility of Herts CC and other bodies, it is essential that East Herts takes this opportunity to put down a marker in this planning process, re. the need for new roads. Bypass for south-east Bishop's Stortford, widening of M11 north of Stansted, bypass for Little Hadham, extension of A414 to M11 past Harlow etc.
	<ul style="list-style-type: none"> Ask that any transport modelling undertaken to support future development options in the East Herts LDF take full account of their impact along the A10 to the M25 junction.

Comments received to Q14 related to other Chapters

Chapter 1: Background and Context

Q14 - Summary Comment	Q14 - Detailed Comment
Green Infrastructure	<ul style="list-style-type: none"> Page 23 includes a table (table 1.1) called physical, social and Green infrastructure .Under Green infrastructure, footpaths are mentioned but towpaths and cycleways should be added to the list

Chapter 3: Development Strategy

Q14 - Summary Comment	Q14 - Detailed Comment
Development Locations/ Growth Options	<ul style="list-style-type: none"> East Herts should choose development locations which are not likely to lead to significant increases in traffic volumes on the A10 as it heads south into Broxbourne. Our emerging Core Strategy identifies that congestion on the A10 is a main challenge as it is used by both local and longer distance traffic and can get particularly busy along its southern stretches. Unlike Broxbourne, which has a dominant north-south pattern of development accessed via the A10, we consider that East Herts can select development options which distribute traffic onto a range of different roads.
	<ul style="list-style-type: none"> Harlow Council looks forward to working with EHDC to locate development in areas that will maximise opportunities to deliver on these policies. It is important to consider that these policies may be more effectively achieved by looking to facilitate improvements to established provision in larger urban centres outside EHDC, particularly Harlow. This can be helped through the location of new development.
Green Belt	<ul style="list-style-type: none"> It is important to recognise that achieving development in the most sustainable locations may involve revisiting Green Belt boundaries.

Chapter 9: Villages

Q14 - Summary Comment	Q14 - Detailed Comment
Development	<ul style="list-style-type: none">• Allowing <u>limited</u> development in villages (larger and smaller) would benefit transport companies which cover less populated areas. An increase in the people residing in the villages is more likely to encourage the transport companies to offer better services.
Braughing	<ul style="list-style-type: none">• We understand that Braughing's 'frequent' bus service has contributed to its being classified as a 'Larger Service Village'.• We ask how the inevitable increase in traffic, resulting from Braughing being a larger service village, would cope with our narrow streets, flanked with listed buildings and few footpaths. Our picturesque village centre has two fords, and roads flood almost whenever it rains.• We understand that you consider Braughing has excellent road transport connections; we can only think that you have never actually driven through our village.

Question 15: Theme 7 LDF Strategic Objectives (Health, Wellbeing and Play)
Have we got the LDF Strategic Objectives for Theme 7 correct?

44 people/organisations provided comments in relation to Question 15. These included:

- 17 Individuals
- 7 Developers/landowners/agents/businesses
- 13 Stakeholders/organisations including:
 - British Waterways
 - Broxbourne Borough Council
 - Buntingford Civic Society
 - East Herts Gospel Hall Trust
 - Epping Forest District Council
 - Hertford Gospel Hall Trust
 - Jehovah's Witnesses
 - Lee Valley Regional Park Authority
 - Natural England
 - Richard Hale Association
 - Rivers Nursery Site & Orchard Group
 - The Theatres Trust
 - Transition Hertford
- 7 Town and Parish Councils including:
 - Aston
 - Hertford Town
 - Little Berkhamsted
 - Stanstead Abbots
 - Thorley
 - Walkern
 - Watton-at-Stone

Q15 - Summary Comment	Q15 - Detailed Comment
Support	<ul style="list-style-type: none"> • Generally and for each objective
HWP2	<ul style="list-style-type: none"> • A local planning authority should not proactively support diversity of faith communities or encourage provision of new places of worship • Particular importance should be put on places for religious worship within community use provision • Combine HWP2 with HWP3 – no need to have a separate objective for faith communities • There is a need to provide places for religious worship in proximity to participants • Diversity of faith communities should be recognised but not at the expense of the majority faith
HWP3	<ul style="list-style-type: none"> • Potential conflict between HWP3 and HWP5. HWP5 needs to recognise that in order to expand an existing school in an identified area of need protected facilities may need to be developed • HWP3 stresses the provision of new facilities which all too often only new development can finance
HWP5	<ul style="list-style-type: none"> • Refer to allotments under HWP5 • HWP5 should include access to the natural world
Objectives are too general / unrealistic	<ul style="list-style-type: none"> • Objectives are as expected but are too general, unrelated, unrealistic and sometimes in contention • Has East Herts ever done anything to support these objectives?
New Objective needed	<ul style="list-style-type: none"> • New objective needed to protect the culture and way of life of Herts villages, where there are ageing populations and declining facilities • New objective needed to support the Living Landscapes initiative
Lee Valley Regional Park	<ul style="list-style-type: none"> • Reference will need to be strengthened at next stage; East Herts should work with Broxbourne and the Lee Valley Regional Park Authority to protect and enhance the environmental and recreational qualities of the Regional Park
Infrastructure	<ul style="list-style-type: none"> • All new development should be supported by adequate facilities
Miscellaneous	<ul style="list-style-type: none"> • Objectives should clearly include cultivating green, sustainable, environmentally beneficial opportunities for health and leisure • Insufficient health facilities generally and in particular to east of the district • Too much emphasis on walking and cycling • Open, green spaces and woodland have a beneficial effect upon wellbeing • Reference should be made to the fact that the district's 4 main settlements are directly connected to the waterways and their towpaths • Rights of Way are of a good standard. Hope that people use the sports facilities allocated to them • Core Strategy would be more effective if it included a policy which allowed sport, recreation and open space facilities to be supported by enabling development • Enhancing and strengthening local communities in ways which increase resilience and reduce their dependency on volatile markets are also ways of improving health, wellbeing and play • Council now needs to follow through on these objectives by enshrining free community access to open spaces in planning policies and then ensuring they are put into practice and adhered to • Gilston Great Park • Thomas Rivers Hospital, Sawbridgeworth • Potential marina east of the Mill Stream, Stanstead Abbots • Stanstead Abbots Parish Council welcome the fact that the Council is taking account of Parish Plans

Comments received to Q15 in respect of other issues in Chapter 2

Q15 - Summary Comment	Q15 - Detailed Comment
Theme 1: Energy & Climate Change	<ul style="list-style-type: none"> Policy options proposed for thematic issues raised under 1, 4, 5, 6, 7 and 8 should consider the role of the Lee Valley Regional Park and opportunities it offers to help address some of the issues
Theme 4: Character	<ul style="list-style-type: none"> Stanstead Abbots Parish Council strongly support objectives CHA1-4 Policy options proposed for thematic issues raised under 1, 4, 5, 6, 7 and 8 should consider the role of the Lee Valley Regional Park and opportunities it offers to help address some of the issues
Theme 5: Economy, Skills & Prosperity	<ul style="list-style-type: none"> Policy options proposed for thematic issues raised under 1, 4, 5, 6, 7 and 8 should consider the role of the Lee Valley Regional Park and opportunities it offers to help address some of the issues
Theme 6: On the Move	<ul style="list-style-type: none"> Policy options proposed for thematic issues raised under 1, 4, 5, 6, 7 and 8 should consider the role of the Lee Valley Regional Park and opportunities it offers to help address some of the issues
Theme 7: Health, Wellbeing & Play	<ul style="list-style-type: none"> Policy options proposed for thematic issues raised under 1, 4, 5, 6, 7 and 8 should consider the role of the Lee Valley Regional Park and opportunities it offers to help address some of the issues The Lee Valley Regional Park Authority supports the inclusion of policy in the Core Strategy for the planned provision of open space, sport and recreation facilities and recognition of the role these facilities can have in contributing to the health and wellbeing of individuals Policy in the Core Strategy should also protect and enhance existing sport, recreation and open space facilities and opportunities for waterside and water based recreation. Policy required to promote and protect existing cultural facilities. Policy should also resist the loss of such facilities unless it can be demonstrated that they are no longer required, or can be provided in another location
Theme 8: Green	<ul style="list-style-type: none"> Policy options proposed for thematic issues raised under 1, 4, 5, 6, 7 and 8 should consider the role of the Lee Valley Regional Park and opportunities it offers to help address some of the issues

Chapter 3: Development Strategy

Q15 - Summary Comment	Q15 - Detailed Comment
Green Belt	<ul style="list-style-type: none"> Strong opposition to the erosion of the Green Belt

Question 16: Theme 7 Policy Options (Health, Wellbeing & Play)

Is our approach to dealing with the policy options for Theme 7 correct?

44 people/organisations provided comments in relation to Question 16. These included:

- 11 Individuals
- 13 Developers/landowners/agents/businesses
- 14 Stakeholders/organisations including:
 - Bishop's Stortford College
 - Buntingford Civic Society
 - East Herts Gospel Hall Trust
 - Epping Forest District Council
 - Haileybury School
 - Hertford Gospel Hall Trust
 - Hertfordshire Biological Records Centre
 - Jehovah's Witnesses
 - Natural England
 - Richard Hale Association
 - Sport England
 - The Theatres Trust
 - The Ware Society
 - The Woodland Trust
- 6 Town and Parish Councils including:
 - Aston
 - Brickendon Liberty
 - Little Berkhamsted
 - Stanstead Abbots
 - Thorley
 - Watton-at-Stone

Q16 - Summary Comment	Q16 - Detailed Comment
Support	<ul style="list-style-type: none"> • Generally • Agree other than for reference to planned provision for places of worship
Policy Options	<ul style="list-style-type: none"> • More should be done; options too general and sometimes in contention; need to be more specific and support the culture and way of life in villages • Policy options should not only prevent the loss of rural services but should also ensure services remain viable e.g. through S106 • Policy options only look at planned provision as a mechanism to deliver new facilities. What about communities where no development is permitted – this does not allow smaller settlements to become more sustainable • Query ability or commitment to actively support policy options • Combined policy needed – where community and cultural facilities provide for the health, welfare, social, educational, spiritual, sporting, recreational, leisure and cultural needs of the community • Policy options should also state that the loss of existing facilities will be resisted unless no longer needed or can be provided in an alternative location • The protection and enhancement of facilities should be dealt with in the Core Strategy and not left to Development Management • Provision of new open space should be considered on a site by site basis • Need to include provision for places of worship
New Policy Options	<ul style="list-style-type: none"> • To allow for new development of community, cultural and leisure facilities where deficiencies are found in town centres • To include specific reference to allotments • Policy options also required to deal with publicising facilities and encouraging use/healthier lifestyles • New option identifying locations for new sport, recreation, cultural and health facilities
Miscellaneous	<ul style="list-style-type: none"> • Provision should be made for new rights of way, especially footpaths • Should be some provision for new places of worship in the Green Belt if provided sympathetically • The creation of new accessible woodland could help to improve the health and wellbeing of a community • Need to distinguish between open space for recreation, green infrastructure and wildlife habitat that should not be disturbed by human activities • An accessible and regular bus service would help provide access to health centres and sports facilities • Protecting and enhancing existing sport, recreation and open space facilities should be the second bullet point (i.e. second LDF Strategic Objective) • More needs to be done to recognise the use of quieter roads and lanes in the pursuit of recreation; conversely cyclists and horse riders need to be encouraged away from main roads
Site Specific Comments	<ul style="list-style-type: none"> • Gilston Great Park • Thomas Rivers Hospital • Land north of Great Hadham Road, east of Monkwood Drive, Bishop's Stortford

Comments received to Q16 related to other issues in Chapter 2

Q16 - Summary Comment	Q16 - Detailed Comment
Theme 4: Character	• Support for Strategic Objectives CHA 1-4
Theme 7: Health, Wellbeing & Play	• Existing Local Plan LRC1 allocations should not prevent land being considered for a broad location of growth in the Core Strategy

Comments received to Q16 related to other Chapters

Chapter 3: Development Strategy

Q16 - Summary Comment	Q16 - Detailed Comment
Green Belt	• East Herts should plan development without impacting on the Green Belt

Question 17: Theme 8 LDF Strategic Objectives (Green)
Have we got the strategic objectives for Theme 8 correct??

51 people/organisations provided comments in relation to Question 17. These included:

- 19 Individuals
- 2 Developers/landowners/agents/businesses
- 19 Stakeholder/organisations including:
 - Bishop's Stortford Civic Federation
 - Broxbourne Borough Council
 - Broxbourne Woods Area Conservation Society
 - East Herts Land Drainage Team
 - Epping Forest District Council
 - Environment Agency
 - Hertfordshire County Council – Environment
 - Hertford Civic Society
 - Hertfordshire Association of Parish and Town Councils
 - Hertfordshire Biological Records Centre
 - Herts and Middlesex Wildlife Trust
 - Lee Valley Regional Park Authority
 - Natural England
 - Rivers Nursery Site & Orchard Group
 - RSPB
 - Thames Water
 - The Ware Society
 - National Grid Property Holdings/ National Grid Gas
 - Transition Hertford
- 11 Town and Parish Councils including:
 - Aston
 - Braughing
 - Hertford
 - Hertford Heath
 - High Wych
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Walkern
 - Ware
 - Watton-At-Stone

Q17 - Summary Comment	Q17 - Detailed Comment
General Mapping	<ul style="list-style-type: none"> • Should include place names to help legibility • Not only larger sites are of value. Map 2.7 should include smaller sites as these are just as important. • Map 2.7 Key Wildlife Sites is the wrong title; needs further explanation and definition. • Fails to show Rivers Nursery wildlife site
General - negative	<ul style="list-style-type: none"> • The objectives and policy options are too general and sometimes in contention. • Developers and planners have been allowed to ignore these in favour of expediency and profit • Objectives and Policies GRE1-4 are very supportable but have failed in the past due to lack of commitment and resources.
General - positive	<ul style="list-style-type: none"> • Welcome that EH is taking account of parish plans in understanding the issues facing EH. • Natural England supports the strategic objectives • Support for principles of Gilston Great Park
GRE1: Waste - general	<ul style="list-style-type: none"> • Support for the strategic objective of GRE1 • Consider creating a new strategic objective relating to reducing/minimising resource use whether this be land, water waste generation etc. to provide a framework for policies relating to water consumption targets, density of development etc. - All households should compost rather than have it collected. All households should be fitted with composting toilets and rainwater harvesting systems. Packaging should be fully compostable • Reducing the amount of waste going to landfill is not an EHC matter but one for central government to introduce new regulations about packaging in particular. • Waste and pollution are on of the main concerns of many. There is a good system in place but there still needs more thought on type of bins and to wash out in the summer.
GRE1: Water – harnessing power	<ul style="list-style-type: none"> • Of importance to the Council's commitment to Green East Herts is the initiative to provide cheap power to Hertford Theatre by harnessing hydro-power from the adjacent water course of the River Lea.
GRE1: Waste - water	<ul style="list-style-type: none"> • Objectives should make specific comment on the provision of facilities for local treatment of sewage and waste water in order to protect vulnerable green infrastructure and built assets from pollution and harm. • Sewerage processing is already at full capacity. Refer to the findings of the Rye Meads Water Cycle Study, which needs to be updated to be in accordance with the Environment Agency's guidance. • Uncertainty in the implications of the Water Framework Directive for future discharge consents. Need to work with EA to clarify. • Most rivers do not have treated waste water pumped back into them. In the towns and villages served by Rye Meads there is very little 'pumping of treated waste water back into the water courses. • The quality of waste water needs to be regulated and should not be bored into underground reservoirs.
GRE2 – biodiversity issues	<ul style="list-style-type: none"> • Fig 2.7 needs to be more focussed on the natural environment and the need to protect and enhance habitats and the species they support. • All areas of wildlife importance should be given greater protection with new objectives: <i>'To protect and enhance designated wildlife sites, local biodiversity and promote networks of green infrastructure as a haven for wildlife as well as a recreational amenity.'</i> • ...referring to protecting wildlife corridors and recreational fingers for existing and new development. • ...<i>'safeguard existing nationally and internationally important habitats and areas of biodiversity (SACs, SPAs and SSSIs) from negative impacts associated with development.'</i> • Developers should be encouraged to incorporate biodiversity into developments. • Conflict of interest; needs to be split into two policies

Q17 - Summary Comment	Q17 - Detailed Comment
	<ul style="list-style-type: none"> • Chalk stream of vital importance to the district • Welcome the inclusion of Key Biodiversity Areas. Wildlife section needs to be made stronger and refer to BAP habitats and work being undertaken through district and county GIPs. • Should refer to work on Green Infrastructure • River networks are a key part of GI, providing connectivity for people and wildlife. New development and redevelopment areas should be set back from rivers. • Reference to protection of Local Sites needed (which should include RIGs Regionally Important Geological Sites), which meet specific criteria of species important in the county. • GRE2 is inadequate, covering everything but stating little specifically about what the objectives are – wildlife, habitats and biodiversity.
Lee Valley Regional Park	<ul style="list-style-type: none"> • The Lea Valley Regional Park should be designated as a protected strategic open space, leisure and multi-functional green infrastructure asset with links to adjoining GI networks
Landscape / Environment/ Green space / Green Belt issues	<ul style="list-style-type: none"> • Green Belt protection/expansion is vital. A fundamental part of what makes Green East Herts. • Any changes to GB designations will have a devastating effect on the key issues (nos. 3,4,6,7, and particularly 8 para.2.11.6) • In addition to objectives listed the plan should specifically target the protection and preservation of the landscape itself and keep new development within defined boundaries to avoid urban sprawl and coalescence. • In Bishop's Stortford essential green spaces give a sense of space. Sky lines and horizons are vital in this • Preserve amenity space and allotments • Preserve existing green spaces and allotments • EH should be surveyed and mapped with linking green corridors to existing woodland plus planting of new woodland and corridors (hedges). • The Lea Valley Regional Park is a key multi-functional Green Infrastructure asset. • Environmental mitigation should form a major part of planning strategy and policy. All land should have a full environmental assessment and S106 should be used more to mitigate impacts. • More emphasis needed on supporting Living Landscape initiative.
GRE3: Water abstraction and consumption	<ul style="list-style-type: none"> • The efficiency of water retention must be improved. A major problem with present development levels. Many of our rivers dry up in the summer. • Impact of growth on water consumption in the driest region should be referenced and issue in general should be addressed prior to new developments which should be limited. New policies should set water consumption targets • Even if metering and new technology is applied to all new homes this would still represent a significant increase in water demand. • The Water Cycle Study recommends the widespread adoption of water efficiency measures both for new and existing properties. This will need to be enshrined in policy within the core strategy and monitored effectively to ensure its effective implementation. • Efforts should be made to increase water supplies prior to development, not just protect existing supplies • Should liaise with water companies and neighbouring authorities as to water infrastructure requirements • In reality there is a water shortage. The water company will supply but at further environmental cost • Cost of supplying and maintaining water supply to new developments in villages is higher than urban areas • Need to source evidence i.e. EEP evidence on the impact of housing and water efficiency on supply.
GRE4: Water flooding	<ul style="list-style-type: none"> • GRE4 very important • Proposed policies would help achieve the stated objectives.

Q17 - Summary Comment	Q17 - Detailed Comment
	<ul style="list-style-type: none"> • Flash flooding is not limited to fluvial flooding in areas near rivers. Extreme weather events are likely to overwhelm surface water drainage systems, gardens and other open areas, particularly on compromised floodplains • Needs to be strengthened to include flood protection at sites already at risk and to encourage sustainable surface water drainage. • Should avoid development locations that could cause flooding downstream (i.e. Broxbourne and River Lee/Lea). Take close note of SFRAs for both Broxbourne and EH. • Lea valley Regional Park a key asset in managing these issues. • Sites in the floodplain should not be precluded but individually assessed in accordance with PPS25 tests, including brownfield sites in urban areas. • Conflict between village categorisation as larger service villages and proximity of floodplains (Stanstead Abbots cited)

Comments received to Q17 in respect of other Chapters

Chapter 9: Villages

Q17 - Summary Comment	Q17 - Detailed Comment
Village infrastructure	<ul style="list-style-type: none"> • Adequate water supply is partly obtaining water and partly piping that water to the users. Putting new development in the villages puts extra strain on their water infrastructure, which costs more per use to maintain and extend than it does in the towns.
Stanstead Abbots	<ul style="list-style-type: none"> • Much of SA lies in a flood risk area and this is contradictory with its apparent prioritisation for development under the categories of Larger Service Village and transport corridor. • We strongly support the strategic objectives CHA1 to 4

Question 18: Theme 8 Policy Options

Is our approach to dealing with the policy option for theme 8 correct?

45 people/organisations provided comments in relation to Question 18. These included:

- 20 Individuals
- 3 Developers/landowners/agents/businesses
- 13 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - British Waterways
 - Broxbourne Borough Council
 - East Herts Land Drainage / Engineering Team
 - Epping Forest District Council
 - Hertford Civic Society
 - Hertfordshire Biological Records Centre
 - National Grid Property Holdings/ National Grid Gas
 - Natural England
 - Rivers Nursery Site & Orchard Group
 - The Ware Society
 - The Woodland Trust
 - Transition Hertford
- 9 Town and Parish Councils including:
 - Aston
 - Braughing
 - Brickendon Liberty
 - Great Munden
 - Hertford Town
 - Standon
 - Thorley
 - Thundridge
 - Stanstead Abbots

Q18 - Summary Comment	Q18 - Detailed Comment
General	<ul style="list-style-type: none"> • Support for principles behind Gilston Great Park • Support for conservation policies • Natural England supports approach to policy options for theme 8 • appropriate • Welcome use of Parish plans in understanding EH issues
Objection	<ul style="list-style-type: none"> • Too general and sometimes in contention
Flooding	<ul style="list-style-type: none"> • Flood risk guidelines need to be stronger – not just guidance but active input. • Flood risk guidance and approach to surface water drainage need to be contained in Core Strategy not subsequent LDF docs as this is integral to decisions on the development strategy • Development may be acceptable in areas of flood risk provided they meet the tests of PPS25 • Add “avoiding development in areas at risk of flooding” <i>and encouraging sustainable drainage by use of above ground SUDs.</i> • Prevent land drainage onto highways and rights of way. Should be channelled into natural ditches and watercourses • Consider surface water drainage on new developments • Conflict between Stanstead Abbots being classified as a larger service village and its location in an area of flood risk
Water resource	<ul style="list-style-type: none"> • Require new developments to use grey water recycling. Surface water drainage should be addressed now not left until later. • Utility providers should provide the additional infrastructure capacity for new developments, water and sewerage in particular. • Development needs to take into account the capacity of Rye Meads for sewage and water. Referred to in regards of Ware but not larger service villages such as Stanstead Abbots. • Reinstate ponds, natural ditches and waterways • Water extraction levels are too high for river system. Sustainable supply must be addressed prior to developments. Too much extraction harms ecology of river system. • Add to strategic objectives the need to maintain and enhance the well-being of rivers. More is needed on water supply and usage • Water quality, supply and management not just an issue for new developments but throughout the district
Preserve Stort Valley	<ul style="list-style-type: none"> • Recognise Stort Valley as an extensive wildlife preserve. Protect it from plans to provide a link to the M11.
Woodland enhancement	<ul style="list-style-type: none"> • Work with Broxbourne Council (and others) to prepare management plan for Broxbourne Woods – utilise GI Plans • Embed woodland creation into EH planning policy to capture all the benefits of woodland landscapes. • Ancient and protected woodlands should be buffered through additional woodland creation • Traditional orchards and their association with wildlife sites need to be dealt with in the Core Strategy
Open spaces/ Wildlife/ biodiversity/ green infrastructure	<ul style="list-style-type: none"> • Open spaces and wildlife must remain a major issue • Must contain a policy on the protection of biodiversity; habitats and species – must be legally binding, not just guidance • Have a LDF document on biodiversity • Need a new policy on protection of sites pre-application as land clearance can occur before an application is submitted • Must protect hedgerows and habitats and incorporate them into developments • Ramsar site not mentioned • Green infrastructure needs to be a greater priority and guidance on specific areas should be dealt with in the Core Strategy as it may impact on development strategy decisions

Q18 - Summary Comment	Q18 - Detailed Comment
	<ul style="list-style-type: none"> • GI provision needed in relation to growth area to the south west of Ware and other edge of settlement developments
Mitigation	<ul style="list-style-type: none"> • Environmental mitigation should form a major part of planning strategy and policy. All land must have a full environmental assessment and mitigation should be built in or handled through S106 and be enforced.
Light pollution	<ul style="list-style-type: none"> • Policy options should include reducing light and noise pollution

Issues received to Q18 in respect of other issues in Chapter 2

Q18 - Summary Comment	Q18 - Detailed Comment
Theme 4: Character	<ul style="list-style-type: none"> • Strong support for strategic objectives CHA1 to 4
Theme 8: Green	<ul style="list-style-type: none"> • Partly right.

Issues received to Q18 in respect of other Chapters

Chapter 3: Development Strategy

Q18 - Summary Comment	Q18 - Detailed Comment
Green Belt	<ul style="list-style-type: none"> • Green Belt must be protected/expanded • Green Belt Review not mentioned • Greenfield sites must be a last resort, where a real and local need exists

Question 19: Theme 9 LDF Strategic Objectives (Monitoring and Delivery)
Have we got the LDF strategic objectives for Theme 9 correct?

39 people/organisations provided comments in relation to Question 19. These included:

- 10 Individuals
- 6 Developers/landowners/agents/businesses
- 13 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - Epping Forest District Council
 - Essex County Council
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council – Environment
 - Hertfordshire Constabulary
 - Highways Agency
 - National Grid
 - Natural England
 - Thames Water
 - The Ware Society
 - Transition Hertford
- 10 Town and Parish Councils including:
 - Aston
 - Braughing
 - Buntingford
 - Hertford Town
 - Hertford Heath
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Walkern
 - Ware

Q19 - Summary Comment	Q19 - Detailed Comment
Strategic Objectives - General	<ul style="list-style-type: none"> • Support/ broadly correct
	<ul style="list-style-type: none"> • LDF strategic objectives MAD1, MAD2 and MAD3 are welcomed. • Objectives are particularly important with regard to the provision of services such as school places.
	<ul style="list-style-type: none"> • Many of the policies proposed are very laudable, but very generic: they are individually supportable but collectively impossible. • The consultation does not say how the Council will decide which policies to support. • Without some sort of prioritisation and resourcing/ costing process the strategies are wish lists, and the policies are completely unsustainable.
	<ul style="list-style-type: none"> • Objectives are what one would expect to find, but they are too general and sometimes in contention.
MAD1	<ul style="list-style-type: none"> • Support
	<ul style="list-style-type: none"> • Objective supports the principles of PPS12.
	<ul style="list-style-type: none"> • Should be a pre-requisite of any planning permission.
Infrastructure Provision	<ul style="list-style-type: none"> • Timely delivery of infrastructure is crucial.
	<ul style="list-style-type: none"> • How can you ensure timely delivery of infrastructure when the Council is not responsible for its provision?
	<ul style="list-style-type: none"> • Assume that 'timely' means before new growth and development is completed.
	<ul style="list-style-type: none"> • Significant issues on the question of infrastructure provision.
	<ul style="list-style-type: none"> • Need to consider infrastructure as a knock on effect from development.
	<ul style="list-style-type: none"> • Current system seems to be to build it first, and then see that infrastructure is required afterwards.
	<ul style="list-style-type: none"> • The infrastructure in East Herts is inadequate and insufficient to deal with the number of new homes proposed.
	<ul style="list-style-type: none"> • There are a number of shortcomings in the expansion of house building in the area from the 1930s onwards that have still not been addressed including schools, health clinics, hospitals, rail and bus services, road systems and parking. Not forgetting retail shops and services. The policies should be very clear on all issues before one house brick is planned to be laid.
	<ul style="list-style-type: none"> • Need to consider increase in sewage and refuse, traffic, and provide additional roads, schools, hospitals and police stations.
	<ul style="list-style-type: none"> • Prior to the building of any new development, careful assessment must be made of infrastructure requirements, with more certainty and timely delivery of infrastructure improvements.
	<ul style="list-style-type: none"> • Should be no more substantive building of houses until specific plans have been generated by the service and infrastructure organisations to provide the additional capacity needed, for water and sewage in particular.
	<ul style="list-style-type: none"> • Before designating any area as fit for development, the LPA should ask the operators of the exiting utility systems to provide information on how much unused capacity there is.
	<ul style="list-style-type: none"> • Given that infrastructure development is largely in the hands of others and has consistently fallen further behind new housing provision, new development should be made conditional upon the provision of the infrastructure to support it.
	<ul style="list-style-type: none"> • Planning permission should not be given for any development unless proven that the infrastructure can support it.
	<ul style="list-style-type: none"> • Development should only be allowed when and where the infrastructure needs have been assessed and funding secured for its improvement.
<ul style="list-style-type: none"> • Timely delivery of infrastructure is easier if the bulk of development is concentrated within the towns rather than spread across the villages, so that various agencies can make more efficient use of their resources. 	
<ul style="list-style-type: none"> • Collaborative working is recommended between East Herts, HCC developers and Essex County Council to deliver appropriate social infrastructure and agree infrastructure thresholds. 	
<ul style="list-style-type: none"> • Need to consider any potential infrastructure deficits and requirements which 	

Q19 - Summary Comment	Q19 - Detailed Comment
	<p>could arise from planned growth in East Herts.</p> <ul style="list-style-type: none"> • Also need to consider growth planned in neighbouring districts in order for a more complete view to be taken on infrastructure needs. • Greater consideration of local expertise needs to be taken into account, rather than simply offers made by the developers. • Support a flexible approach to provision of infrastructure which recognises the challenges of bringing forward new development in the current economic climate.
Infrastructure Delivery Plan (IDP)	<ul style="list-style-type: none"> • Support the reference to the preparation of an Infrastructure Delivery Plan. • Support the provision of an IDP to set out infrastructure required to support growth. • It will not be possible to identify specific network upgrades to the water and wastewater infrastructure in the IDP until there is certainty of the scale, exact location and phasing of development. • Where is a detailed document explaining how infrastructure will be dealt with? • Hertfordshire Constabulary wish to be consulted and have input into the IDP, which will give the opportunity to identify any specific on site infrastructure requirements necessary to mitigate the impact of new development.
Infrastructure – Water/ Wastewater	<ul style="list-style-type: none"> • Core Strategy needs to include suitable mechanisms for ensuring that necessary water and wastewater infrastructure that cannot be provided through Section 106 agreements is delivered ahead of the occupation of development. • Rye Meads Water Cycle Study will be a key piece of evidence in the production of the Core Strategy. • It is essential that investment is directed to the areas where growth will take place so as to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. • New development may need to be phased to allow the prior completion of necessary infrastructure; 1-3 yrs for minor works, 3-5 yrs for major upgrades and 5-10+ yrs for the provision of new water or sewerage treatment works. • Current asset investment proposals are based on housing growth levels in the RSS. Keen to work with LAs to understand the potential implications of any changes to proposed housing targets on the delivery of water and wastewater infrastructure. • Account must be taken of other developments within the catchment both within and outside of East Herts district. • Infrastructure will need to be improved to cater for the clean and waste water needs of residents. • Rye Meads does not have the capacity to take any more sewage and is in danger of contravening EU regulations on the amount of sewage going into the River Lea. • When considering the outward enlargement of an existing built up area, the slope of the land needs to be considered due to the issues associated with laying new sewers.
Infrastructure – Energy	<ul style="list-style-type: none"> • Will be necessary to revise and update much of the UK's energy infrastructure over the next 20 years. • Need for an expansion of energy infrastructure and new forms of energy infrastructure • National Grid wish to be involved in the preparation, alteration and review of DPDs.
Infrastructure – Education	<ul style="list-style-type: none"> • Schools will have to grow to accommodate the increased population. • Future development on the Essex border must include commensurate on-site schools and Early Years and Child Care provision. • In any new neighbourhood or where existing capacity cannot be expanded, new education facilities could be required at much lower thresholds than indicated in Table 1.2.

Q19 - Summary Comment	Q19 - Detailed Comment
Infrastructure – Roads	<ul style="list-style-type: none"> Roads will have to be built or redesigned to cope with the traffic needs.
Infrastructure - Policing	<ul style="list-style-type: none"> Essential that the Core Strategy identifies the Police as a social infrastructure delivery agency. The delivery of new development will impose additional pressure on the Police infrastructure base which is critical to the delivery of an effective police service.
Infrastructure Funding	<ul style="list-style-type: none"> Public money to build the infrastructure required will be harder to source. Statements about infrastructure primarily being funded through mainstream public funding are misleading. Emerging picture is development assisting public funding, not public funding supporting development. Infrastructure funding to support service provision will have greater significance in the future, in the light of anticipated budget reductions. Important that the Core Strategy sets out appropriate funding mechanisms for infrastructure delivery The cost of relieving any pressure on infrastructure caused by new developments should not be borne solely by the public purse. Developers should pay for the costs associated with extending underground piping and cable systems. Where information shows that the costs of reinforcing existing infrastructure are likely to be prohibitive, would prefer that the LPA do not allocate the land for development or keep the land as Green Belt.
CIL/ New Homes Bonus	<ul style="list-style-type: none"> CIL and New Homes Bonus need to be factored into the overall considerations of 'delivery'. The incentives arising from these initiatives are important sources of funding or direct delivery of infrastructure.
MAD2	<ul style="list-style-type: none"> Support
Monitoring	<ul style="list-style-type: none"> Monitoring needs to include ongoing and genuine consultation with the public Annual Monitoring Report should help 'monitor' biodiversity; wildlife sites and species. There needs to be independent monitoring of key targets and much more input, influence and decision making from local parishes and communities.
Location specific – Monitoring	<ul style="list-style-type: none"> Encourage the District Council to work with Stanstead Abbots Parish Council in monitoring the effectiveness of plans at a local level.
MAD3 – developer contributions	<ul style="list-style-type: none"> Support Need to enforce developer contributions. Developer contributions must be used in the geographical area of the development in consultation with local parish/town council. Developers (who will make the profits from the development) must contribute to the cost of establishing a suitable infrastructure. Core Strategy must highlight that developers are expected to mitigate the impact of their proposals on community infrastructure. Core Strategy should reference that any developer contributions sought have to comply with the five tests set out in Circular 05/05 and the CIL Regulations 2010. Essential that Police infrastructure is identified as being needed to support development, to which developer contributions may be required. There should be a strategy that links S106 agreement spend to the strategic objectives of the LDF.
Viability	<ul style="list-style-type: none"> Objective should include a caveat that these goals be achieved subject to maintaining viability of development proposals. Council need to take into account the viability of new development in order to ensure the deliverability of the scheme. Core Strategy policy should take into account the viability and deliverability of developments when assessing how new infrastructure is to be delivered and funded.
MAD4	<ul style="list-style-type: none"> Support

Q19 - Summary Comment	Q19 - Detailed Comment
Miscellaneous	<ul style="list-style-type: none"> • Need to bring forward 2016 Building Regs to commencement of LDF, or delay LDF until 2016.
	<ul style="list-style-type: none"> • Sustainable and development are mutually exclusive – development is not sustainable, nor is growth.
	<ul style="list-style-type: none"> • Areas which need regeneration are being overlooked in favour of areas which are already successful.
	<ul style="list-style-type: none"> • East Herts cannot become the overspill for London commuters.
	<ul style="list-style-type: none"> • Issues surrounding environmental protection requirements and retrospective planning applications.
	<ul style="list-style-type: none"> • Strong legislation and legal challenge must be upheld.
	<ul style="list-style-type: none"> • Essex County Council welcomes collaborative working in respect of the daily trip rates utilised in the maps in the settlement chapters.
	<ul style="list-style-type: none"> • National Grid is happy to provide pre-application advice to developers and LAs on planning applications.
	<ul style="list-style-type: none"> • Council need to be aware of the lead-in time for housing delivery.
	<ul style="list-style-type: none"> • It is inappropriate that the consultation document should be so skewed towards new build and so, by and large, you will be monitoring the delivery of inadequate targets.
Site Specific	<ul style="list-style-type: none"> • Table 1.1 should include shops, parking and jobs.
	<ul style="list-style-type: none"> • East of Stevenage – no development as water would be abstracted from the R. Beane, which is already over-abstracted.

Comments received to Q19 in respect of other issues in Chapter 2

Q19 - Summary Comment	Q19 - Detailed Comment
Theme 3: Housing	<ul style="list-style-type: none"> • Totally opposed to 8,500 homes.
	<ul style="list-style-type: none"> • Question the need for such a large number of dwellings.
Theme 4; Character	<ul style="list-style-type: none"> • East Herts has a wonderful rural ambience which must not be compromised.
Theme 9: Infrastructure & Delivery	<ul style="list-style-type: none"> • Perhaps the Core Strategy preparation process should include policy options in relation to the IDP.
	<ul style="list-style-type: none"> • Crucial for supportive policies for the delivery of water and wastewater infrastructure to both support growth and deliver environmental improvements to be provided in the Core Strategy.
Theme 9: Infrastructure & Delivery	<ul style="list-style-type: none"> • Water and Sewerage Infrastructure Capacity – Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: sufficient capacity already exists or extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development.
	<ul style="list-style-type: none"> • Proposed Supporting Text – The Council will seek to ensure that there is adequate water, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.
	<ul style="list-style-type: none"> • Water and Sewerage Infrastructure Development – The development or

Q19 - Summary Comment	Q19 - Detailed Comment
	<p>expansion of water and waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.</p>

Question 20: Theme 9 Policy Options (Monitoring and Delivery)

Is our approach to dealing with the policy options for Theme 9 correct?

24 people/organisations provided comments in relation to Question 20. These included:

- 6 Individuals
- 3 Developers/landowners/agents/businesses
- 11 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Broxbourne Borough Council
 - Epping Forest District Council
 - Hertford Civic Society
 - Hertfordshire Biological Records Centre
 - Hertfordshire Constabulary
 - Natural England
 - Rivers Nursery Site & Orchard Group
 - Sport England
 - The Ware Society
 - Transition Hertford
- 4 Town and Parish Councils including:
 - Aston
 - Brickendon Liberty
 - Stanstead Abbots
 - Thorley

Q20 - Summary Comment	Q20 - Detailed Comment
Support	<ul style="list-style-type: none"> • Generally
Disagree	<ul style="list-style-type: none"> • Could do much more. • Paragraph 2.12.7 contradicts 2.12.6 • Policy options are what one would expect to find, but they are too general and sometimes in contention. • All of the bullet points raised are of sufficient importance to be addressed by policy in the Core Strategy and not deferred to some undefined future exercise.
Policy Options – Infrastructure Provision	<ul style="list-style-type: none"> • Lack of a strategy in relation to infrastructure provision is of major importance. • Strategy needed to ensure that infrastructure provision keeps pace with development.
Infrastructure - Sewage	<ul style="list-style-type: none"> • Thames Water and Environment Agency advised Broxbourne Council that Rye Meads sewage treatment works may exceed its consented flow limits after 2021 and that it may not be possible to accommodate higher rates of growth. • East Herts will need to consider where sewage treatment works capacity might exist to enable development. • An increase in flows from East Herts to Rye Meads sewage treatment works would be a concern for Broxbourne as Hoddesdon is served by Rye Meads.
Policy Options – Monitoring	<ul style="list-style-type: none"> • Monitoring process must make clear how the objectives/policies are prioritised as they cannot all be attainable at the same time. • Need to monitor biodiversity • If you do not monitor and measure what is happening to wildlife sites, associated habitats, traditional orchards, hedgerows and everything from bats to bees to badgers, how will you know what you are losing until it is lost forever? All planning departments have the latest statistics for the thousands of hectares of hedgerows and orchards lost already through the planning system. • Need to monitor the maintenance and enhancement of the built and natural environment. • Core Strategy should give detailed guidance on monitoring of development management policies. • This level of 'monitoring' is extremely expensive and provides unreliable data. • Monitoring and auditing of objectives should be by central government. • There are many voluntary bodies, organisations, clubs etc, that have a strong interest in the aspects to be covered that can provide monitoring and in some cases the delivery needed under the Strategy. Such bodies often provide otherwise untapped expertise and are quite capable of reporting as required. • Where no existing voluntary source is available the Council should help to bring one into existence.
Location Specific - Monitoring	<ul style="list-style-type: none"> • Encourage the District Council to work with Stanstead Abbots Parish Council in monitoring the effectiveness of plans at a local level.
Policy Options – Developer Contributions	<ul style="list-style-type: none"> • Core Strategy should give detailed guidance on developer contributions. • 'Guidance' is insufficient to get results; mandatory requirements must be in place to guarantee that developers do what is required of them. • Clarity on developer contributions is needed in advance so site viability can be tested. • NHDC have now had a Planning Obligations DPD in place for 2-3 years. • Policy approach in the Core Strategy and LDF documents needs to be suitably flexible with regards to developer contributions towards infrastructure costs and realistic to recognise issues of commercial viability which will affect the ability of development on certain sites to deliver developer contributions. • Seek flexibility in the strategy for developer contributions towards infrastructure costs which recognises the current economic challenges of bringing forward new development. • We urge the Council to take into account the viability of new development in order to ensure the deliverability of the scheme. • It will be necessary to publish supplementary guidance on developer contributions to ensure timely funding and provision of infrastructure to support

Q20 - Summary Comment	Q20 - Detailed Comment
	new development.
Miscellaneous	<ul style="list-style-type: none"> • Would like to see public money allocated to green, sustainable, environmentally beneficial, economically beneficial projects. • It is inappropriate that the consultation document should be so skewed towards new build and so, by and large, you will be monitoring the delivery of inadequate targets.
Site Specific	<ul style="list-style-type: none"> • Gilston Great Park

Comments received to Q20 in respect of other issues in Chapter 2

Q20 - Summary Comment	Q20 - Detailed Comment
Theme 3: Housing	<ul style="list-style-type: none"> • Caveats must be placed on developments to ensure that the housing needs of the local population are met, i.e. A first priority must be to provide housing suitable to meet the declared shortages in the towns and villages in which the development is located.

Question 21: LDF Vision

Is our emerging LDF vision for what East Herts will be like in 2031 correct?

49 people / organisations provided comments in relation to Question 21. These included:

- 17 Individuals
- 12 Developers/landowners/agents/businesses
- 11 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - Epping Forest District Council
 - Hertford Civic Society
 - Rivers Nursery Site & Orchard Group
 - The Ware Society
 - Transition Hertford
 - Environment Agency
 - Hertfordshire County Council – Environment
 - Hertfordshire Biological Records Centre
 - Natural England
- 9 Town and Parish Councils including:
 - Aston
 - Braughing
 - Cottered
 - Great Munden
 - Hertford Heath
 - Stanstead Abbots
 - Thorley
 - Thundridge
 - Walkern

Q21 - Summary Comment	Q21 - Detailed Comment
Support	<ul style="list-style-type: none"> General support; most reassuring and intelligent part of Issues and Options
Object	<ul style="list-style-type: none"> Incorrect. Long term aspirations have not produced in the past - what confidence can we have that future desires will be fulfilled?
	<ul style="list-style-type: none"> Themes are too wordy and wide ranging - when reality checked almost nothing of actual benefit or improvement results
	<ul style="list-style-type: none"> Not too sure about urban communities in the countryside - I think they will eventually dominate
Purpose of vision	<ul style="list-style-type: none"> Agree with vision as far as it goes but it needs to set out what, where, when and how things will be delivered - requires clarity to make it effective in accordance with PPS12
	<ul style="list-style-type: none"> Difficult not to agree - but are they realistic and can they be delivered? Laudable but a wish list - without priorities it is unattainable;
	<ul style="list-style-type: none"> Strongly support acknowledgement that mix of rural communities should be safeguarded and enhanced. Too often, villages are dismissed as unsustainable based on dubious assumption of what sustainability means
	<ul style="list-style-type: none"> Vision needs to tie together other key elements of Core Strategy including objectives, level of proposed development, broad locations and necessary infrastructure to deliver the plan. Needs to be carefully linked to locations for development as it will influence other LDF documents e.g. Site Allocations. Include an appropriate policy to protect settlements from inappropriate development
	<ul style="list-style-type: none"> Correct in that it describes a desirable state of affairs but not a description of what would actually happen if the aims of the Core Strategy were pursued e.g. increase in population = decrease in area of countryside, increased pressure on infrastructure, more congestion, loss of character
	<ul style="list-style-type: none"> Each community needs to be consulted individually RE wants and needs and this must be written into the LDF and implemented; little expectation that EHDC will allow "everyone to take part in decisions"
	<ul style="list-style-type: none"> Take a view as to likely trends and changes and how these evolve The authors of this report are assuming that in 2031 the structure of the economy will be largely identical to that of 2010, only larger in volume. We consider that this is unlikely, given the mounting pressures on global resources and finances that are already becoming evident.
Vision statement	<ul style="list-style-type: none"> Refer to need to house district's population; concept of fairness in terms of accessibility to housing; explicit recognition of social and economic opportunities;
	<ul style="list-style-type: none"> Refer to promotion of sustainable, high quality development (along with economic, environmental and social opportunities)
	<ul style="list-style-type: none"> Important to recognise that improving high quality of life can be achieved through the sustainable development of housing, employment and leisure facilities
	<ul style="list-style-type: none"> Explicit reference to regeneration/re-use of brownfield sites within the urban area in close proximity to public transport - assist with meeting development targets and sustainable development objectives
	<ul style="list-style-type: none"> Need to safeguard the resilience and creativity of local communities in an uncertain future by significantly reducing journeys, through the localisation of businesses and services and the strengthening of local communities. Transition Hamlets offer a model for East Herts rural areas: about two acres of homes and workshops surrounded by six or seven acres of productive land and natural woodland and linked by 'green drives', are a resilient way forward.
Additional bullets	<ul style="list-style-type: none"> Additional bullet points to highlight the need to meet current and future housing and employment need
	<ul style="list-style-type: none"> Commitment from both public and private agencies to increase sustainability of all the district's settlements regardless of their size
Theme 1	<ul style="list-style-type: none"> Serious omission: reference to protecting rural land since all plants (not just trees) help with climate change. This is a significant resource in East Herts
	<ul style="list-style-type: none"> Rephrase "clean energy" with "renewable and low carbon energy supplies"

Q21 - Summary Comment	Q21 - Detailed Comment
	<p>that encompasses use of waste and supports outcomes of Hertfordshire Renewable and Low Carbon Energy Study.</p> <ul style="list-style-type: none"> • Refer to cutting greenhouse gas emissions of existing stock • No mention of tackling fuel poverty/variable electricity supply (see “Zero Carbon Britain 2030”; high insulation to existing stock. • Refer to clean energy? Is this beyond remit of East Herts Council or does it imply Council will encourage wind turbines contrary to Theme 4? • Existing buildings not just new development
Theme 3	<ul style="list-style-type: none"> • Expand to note that LDF will seek to improve affordability of housing and to bring home ownership within reach of whole community (to be consistent with vision statement) • Should be clear that this is in the context of not encouraging/no increase in the size of population in East Herts
Theme 4	<ul style="list-style-type: none"> • Poorly worded - needs to take a clear stand against Green Belt development
Theme 5	<ul style="list-style-type: none"> • Refer to importance of a low carbon economy • Approach to transport is unrealistic - instead of attempting a modal shift, why not support a move towards greener cars • Pious hope but people still want car ownership. Green energy sources may occur
Theme 6	<ul style="list-style-type: none"> • A highly skilled workforce will require proportion of low density housing - need to ensure that East Herts does not become a temporary overspill for London • Agree but also recognise need to provide adequate employment opportunities for unskilled population who will continue to make up a significant proportion of the total • Encourage residents to work in the district
Theme 8	<ul style="list-style-type: none"> • Replace “controlled” with “managed” - in order to fully adapt to impacts of climate change engineering solutions (to both new and existing developments) and the actions of people through a variety of solutions are required to minimise risk; wording could be misleading: suggest hazards are managed in a cost effective and sustainable manner rather than controlled • Specifically address the natural environment and biodiversity - all new development will mitigate and compensate for wildlife by making positive environmental contributions • Be clear that East Herts is already over developed and that new development is unacceptable • Needs a rethink - too general and means very little
Theme 9	<ul style="list-style-type: none"> • Objective MAD1 is viewed as essential and should be a pre-requisite of any planning permission. No development should occur where provision of suitable infrastructure is not possible; guidance alone is insufficient, requirements must be mandatory.
New Theme 10	<ul style="list-style-type: none"> • Document and monitor assumptions and how these evolve and how changes will impact Core Strategy
Objectives prioritisation	<ul style="list-style-type: none"> • 1. Move towards sustainability and acknowledge climate change threat; 2. Protect character and distinctiveness of settlements including green infrastructure; 3. Accommodation of small, low income, ageing households (ties in with avoidance of car dependency); 4. Cost effective provision of service infrastructure at a time of public expenditure constraints (ties in with larger not smaller developments)
Time span	<ul style="list-style-type: none"> • Document needs to be consistent • Support the fact that Core Strategy will cover the period to 2031
Other	<ul style="list-style-type: none"> • Planners need to advertise more to their public the quality of the work they do and the contribution they are making to quality of environment, otherwise open to breeches to the system from interested parties and or distant bureaucrats imposing targets from above • Parish councils are not blessed with crystal balls

Comments received to Q21 in respect of other issues in Chapter 2

Q21 - Summary Comment	Q21 - Detailed Comment
Theme 3: Housing	<ul style="list-style-type: none"> Core Strategy should ensure continuous 5 year supply of viable housing land for at least 15 years
	<ul style="list-style-type: none"> Conversion of redundant barns into housing esp for young or elderly family members need to be facilitated
	<ul style="list-style-type: none"> New policy: conversion of one house into two dwellings; permit extensions & conversions for annexes for family members; and extensions & conversions to provide living space for other families - currently contrary to policy but would allow local people to stay in their environment - not a speculative approach
Theme 9: Monitoring and Delivery	<ul style="list-style-type: none"> Essential to improve infrastructure (water, sewerage, road) before attempting further housing

Comments received to Q21 in respect of other Chapters

Chapter 3: Development Strategy

Q21 - Summary Comment	Q21 - Detailed Comment
Housing Target	<ul style="list-style-type: none"> Question number of dwellings. Based on predict and provide which may be wrong e.g. Stansted Airport; critically review total amount of development given greenfield land take is inevitable; East of England Plan is flawed - should be based on development with and around Hertfordshire
	<ul style="list-style-type: none"> Probably an over-estimate of housing - other than low cost and starter homes
Brownfield	<ul style="list-style-type: none"> Prioritise brownfield land and where Green Belt release is concerned, should be in the best interests of sustainability, least damage to Green Belt aims, and protection of settlement character and setting

Chapter 5: Buntingford

Q21 - Summary Comment	Q21 - Detailed Comment
Growth	<ul style="list-style-type: none"> Not able to physically accommodate substantial levels of growth or infrastructure capacity especially to the north
Vision	<ul style="list-style-type: none"> Buntingford Town Council has a brief and clear vision