

ESSENTIAL REFERENCE PAPER 'I': CHAPTER 3 - DEVELOPMENT STRATEGY

Question 22: Development Strategy

Which development strategy do you think is the most appropriate to meet the challenges facing East Herts and achieve sustainable development? Is there another option we have not considered?

497 respondents provided comments in relation to Question 22. These included:

- 413 Individuals / Residents
- 43 Developers / Landowners / Agents / Businesses
- 28 Stakeholders / Organisations including:
 - Aston Village Society
 - Birchanger Parish Council (Uttlesford)
 - Bishop's Stortford Civic Federation
 - Broxbourne Borough Council
 - Broxbourne Woods Area Conservation Society
 - Buntingford Civic Society
 - CPRE - The Hertfordshire Society
 - East Herts Council Landscape
 - EEDA
 - Environment Agency
 - Epping Forest District Council
 - Harlow District Council
 - HCC Environment
 - HCC Minerals and Waste
 - HCC Passenger Transport Unit
 - HCC Property
 - Hertford Civic Society
 - Hertfordshire Association of Town and Parish Councils
 - Highways Agency
 - Lee Valley Regional Park Authority
 - Parsonage Residents Association
 - RSPB
 - Stevenage Borough Council
 - Thames Water
 - The Ware Society
 - Thorley Manor Residents Association
 - Transition Hertford
 - Welwyn Hatfield Council
- 13 Town and Parish Councils including:
 - Aston
 - Bishop's Stortford Town
 - Braughing
 - Great Munden
 - Hertford Heath
 - Little Hadham
 - Much Hadham
 - Sawbridgeworth Town
 - Stanstead Abbotts
 - Tewin
 - Thorley
 - Thundridge
 - Walkern

Q22 - Summary Comment	Q22 - Detailed Comment
General Support	<ul style="list-style-type: none"> • Can't think of any other options • Broad support for options in the document and SA • General scope of options well considered • Reasonable basis from which further more detailed analysis can be carried out
Disagree / Critique of Options	<ul style="list-style-type: none"> • None of the options are appropriate / ideal • Do not consider the impact on the villages or the volumes associated with each area • Too simplistic <ul style="list-style-type: none"> • Require more rigorous testing to understand potential impacts • Most sustainable option will be a hybrid of different elements of these strategies • Meaningless - everyone in villages will say towns and vice versa • Flawed - some large villages have poor public transport links • Number of jobs in past has been very low • Suggests that most people moving to new houses will commute pushing more cars onto the roads • Unclear as to what role sustainable development and sustainability appraisal has played in assessing the options • Unclear as to what role strategic objectives have played in assessing the alternative growth options - no discussion since options primarily based on accessibility • Difficult to answer this question without considering how housing will be distributed (Q23) • Why is it necessary at this stage to say where they will be located? • No one option in isolation and do not agree that are all realistic • All have downside of car-dependency • Absence of any numerical breakdown of 8,500 between settlement types makes it difficult to rank options • Core Strategy fails to embrace localism agenda - approach simply distributes a top down target rather than being bottom-up and based on the wishes of individual towns and villages. Town and Parish plans should be the building blocks and you should facilitate them for those localities that do not yet have them • Packing too much in the larger towns would not help communities – it would be better to look at the possibilities that are near that could be expanded • Disagree that 'to-find' figure is less important than how homes are distributed - inextricably linked with assessment of capacity, location, viability otherwise impossible to determine most effective way to distribute them
Disagree / Critique of Options: Standard Bishop's Stortford Civic Federation Response (or equivalent)	<ul style="list-style-type: none"> • None of the options are appropriate because they distribute a housing target that has been scrapped. Demand and its distribution should be based on population forecasts, infrastructure, the Green Belt protection and local employment prospects
Comments on Approach to Generating the Options / Further Work	<ul style="list-style-type: none"> • Irrespective of whichever option is taken forward, there remains a real and strong need to provide new homes • Options should be informed by capacity and implications for County Council services • Strategy must be integrated with wider economic issues and challenges facing the district including impact of regeneration of Harlow, Stevenage, Lee Valley

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	<ul style="list-style-type: none"> • Development tailored to actual local demand and the availability of work, schools, transport • Quantum of housing has significant bearing on broad options for growth • Options (including Harlow) should be reappraised against strategic objectives, sustainable objectives, not just accessibility • Further analysis to provide a clearer understanding of the impact on the strategic road network • Clear evidence necessary to determine why certain options are considered better or worse and to justify why options are taken forward or discounted • Need to base strategy on informed bottom-up assessment of housing demand based on local population estimates and assessment of infrastructure, employment, Green Belt for each town • Transport is priority for all options outside of large towns • Whichever approach is finally adopted, should be founded on a robust and credible evidence base and based on principles of sustainable development as set by national planning policy • Council must recognise that sites outside the options may also need to be considered for development in order to meet the long-term housing needs of East Herts. This may include Green Belt / greenfield sites and sites in smaller villages and it is important that the Council also assesses the availability and potential of development sites in these locations • In accordance with PPS1 & PPS3, new development should be directed where there is a good range of community facilities, jobs, key services • Development should take place in accordance with local need - particularly relevant for villages where the maintenance of the local population in line with growth/ ageing/ births/ employment etc have always required changes to available housing stock and amenities • Concerned that broad locations for growth are purely based on un-assessed sites put forward by those with a vested interest in their development. Hostage to fortune - Council should shape its Development Strategy around the public preference. What contingency does the Council have if the majority of call for sites in the growth areas proves unviable? • Core Strategies must be justified and based on evidence that considers the views of the local community and is backed up by technical evidence • Options must be more nuanced and community views should be balanced with principles of sustainable development. Community suggestions may be unsustainable e.g. results Interactive LDF Sessions in respect of Chipping / Church End (too much growth in unsustainable location) and Stanstead St Margarets / Watton-at-Stone (too little in a sustainable location) • Settlements have different access characteristics - larger the settlement, the more readily available sustainable transport is • Better compromise might be to base option on deeper study of infrastructure (transport capacity & utility network options) rather than attempting to classify settlements by current size • Where possible, development should be within or close to built-up areas, particularly those close to town centres and public transport routes, although school playing fields, allotments, gardens, recreation grounds etc should also be protected. • Could be better to classify by availability of surrounding suitable land without causing settlement coalescence rather than classifying by current size/service nature • Decisions on housing location are not just about where there is least resistance to development but also where people might prefer to live. The difficulty is in deciding the best proportions between town and rural in the long-term and difficult to know how society will change (e.g. use of computers and home working, fuel availability, energy infrastructure, co-location of rural services, and the services that villagers

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	<p>want)</p> <ul style="list-style-type: none"> • Evaluate past expansion and identify no-go areas due to current over-development • Supports current approach which allows use of all available sites and enhances the viability of communities • Broader allowance for low and medium density development across the district. This must be moderated to ensure that it does not result in strip developments along these routes that would start to join these settlements. This can be achieved through the use of a green belt approach around settlements such as we have already with a defined envelope. • The Matthew Taylor Review notes that development in market towns can detract from economic and social vitality of smaller nearby villages making them reliant on towns and reducing self containment. To relieve this tension, the Core Strategy must allow some levels of economic and housing development in smaller settlements • Just because villages are less sustainable than towns doesn't mean that they should receive no development. East Herts should develop a policy framework that takes into account need to encourage people to switch to sustainable modes but allows rural village economies to thrive • In favour of new housing within the existing traditional boundaries of the towns and villages of East Hertfordshire but strongly opposes the attempt being made to swamp East Herts with new housing • Existing Minerals Plan must be taken into account when considering growth options and fact that minerals may have to be extracted prior to development and the opportunistic use of some limited or poorer quality minerals within the development itself • Build lower number of houses only where/when absolutely necessary and where a suitable site becomes available to be decided on a case by case basis • Elements of the presented alternatives are not necessarily mutually exclusive. Consultation may have been better served by consulting on distinct elements individually
Alternative Options	<ul style="list-style-type: none"> • Flawed nature of methodology used to determine quantum of housing capacity and selection of growth areas (use of Call for Sites and omission of HCA) make it impossible to judge true requirement for major settlements and residual requirement for rural settlements and Green Belt
Alternative Options: Specific Locations	<ul style="list-style-type: none"> • Towns and Puckeridge • Towns and Stevenage • Stevenage and Welwyn Garden City • Stevenage, Welwyn Garden City and Harlow North • Stevenage, Welwyn Garden City and Bishop's Stortford • Towns, Stevenage, Welwyn Garden City and transport corridors • Anywhere but Bishop's Stortford • Area between Tonwell and Stevenage / west side of A10 (with improved transport facilities) • Bulk around Sawbridgeworth & southeast, distributed using Option F and some allocated each to Category 2 and 3 villages (Category 1 villages should be protected) • Urban scrub land between Welwyn Garden City and Hertford • Terlings Park • Development along old A10 between Ware and Puckeridge • Towns, Watton-at-Stone and Stanstead Abbots - places with rail services • Towns with good public transport • Welwyn/Hertford/Stevenage triangle rather than threatening already struggling services • Hertford, Ware, Bishop's Stortford, Buntingford etc and the smaller service villages - Watton-at-Stone, Datchworth, Walkern etc

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	<ul style="list-style-type: none"> • Single much larger development of one of the existing towns such as Hertford - already served by rail and road, will concentrate infrastructure and reduce costs
Alternative Options: Non-specific Locations	<ul style="list-style-type: none"> • Jobs are outside the district so most sustainable option is to put dwellings on edge of district nearer to employment to minimise driving through district • Infill and growth on edges of towns and areas of inferior housing and by building 4 & 5 storey flats • Fewer homes in all areas and small developments in remoter areas • General policy for increasing all towns and villages by 10% against existing housing stock - would limit need for additional infrastructure and would avoid loss of productive agricultural land • Support development along suitable corridors. If there is not sufficient land to achieve this, the only way to preserve overall rural scene is to share the pain equally • Little expansion to towns with good public transport • Growth focused in larger settlements as these have established infrastructure, but some development in smaller settlements will be essential if services are to survive • Build council houses - a few in each hamlet, village, towns • Developing towns/villages with least constraints (i.e. flood plains, Green Belt, infrastructure) • If every area with facilities took some development the overall impact would hopefully be less • Northern development and better transport routes • Build 'Transition Hamlets' • Inclusive communities (see "Local Sustainable Housing" by Chris Bird) • Locate all houses as close to major cities as possible - already have infrastructure, crowded and land environmentally destroyed
Alternative Options: Locations Outside of East Herts	<ul style="list-style-type: none"> • South of Royston as it has a rail link • North of Welwyn Garden City to Stevenage - east of A1 corridor • M11 Corridor • North Weald, Ongar
	<ul style="list-style-type: none"> • Stansted - space for development near the airport
Alternative Options: Areas to Avoid	<ul style="list-style-type: none"> • Areas of good landscape value (e.g. Beane Valley) • Coalescence between East Herts and Stevenage • Increasing development in the southeast quadrant of East Herts would add to coalescence problems which is not a supported principle of planning
Town Comments	<ul style="list-style-type: none"> • Support principle that whichever option is selected, a large part of new development should be allocated to the towns, as the most sustainable locations • Most people live in large towns with trains and shops - therefore towns will expect more growth • Focus on the towns with good rail links, to <ul style="list-style-type: none"> • reduce car use • must have reliable and frequent trains • integrated transport system (with bus and coach) • reduce CO2 emissions • Larger towns have established infrastructure to support and absorb growth • Why spend a fortune developing rural areas when infrastructure is already in place in towns? • Locate all developments on least fertile margins of existing towns • No towns at all • Why do towns feature in all options? • Risk is that as towns become even larger and only peripheral development is possible, new residents are too far from the town centre for bus services to be efficient so they drive everywhere • Towns already full
New Settlement	<ul style="list-style-type: none"> • Note that idea of new settlement discarded as unachievable but when would it get considered?

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	<ul style="list-style-type: none"> • May be better solution than developing existing towns which may compromise quality of life • Too expensive? • Space for a new town? • Impact on Green Belt? • Will not be popular • Identify Larger Service Villages suitable for expansion as new town/s • New Larger Service Villages • New small settlements in places with low visual impact
Benefits of a New Settlement	<ul style="list-style-type: none"> • Self contained with all supporting infrastructure • Built near transport links • Capacity to expand • Avoid ribbon development and retain smaller villages and larger towns • Allow fresh thought • Prevent already overstretched facilities elsewhere becoming even more stressed • Sustainable development (zero carbon) / energy saving technology • Balanced mix of dwellings • Won't impact on already congested areas • Protect character of our towns and villages • Can't ruin new towns
Suggested Locations for a New Settlement	<ul style="list-style-type: none"> • A1 corridor (good train access & within bus distance of hospitals) • Buntingford area - two good road links nearby • East of Buntingford near M11 • Southwest of Buntingford • North of Buntingford • A10 corridor
Suggested Locations for a New Settlement Outside East Herts	<ul style="list-style-type: none"> • Knebworth • North of Royston on A10 Corridor • On M11 corridor (possibly even comparable to Milton Keynes to soak up incomer pressure) • Old airfields e.g. North Weald • North of Buntingford between A10 and M11 near Cambridge rail line using similar model to Letchworth and Welwyn Garden City
Oppose New Settlement	<ul style="list-style-type: none"> • Support decision not to promote a new town which would be undeliverable
Option A - support	<ul style="list-style-type: none"> • General support, reflects PPS3, most sustainable option • Easily accessible to existing services and higher levels of concentration will allow more efficient provision of new services • Wide range of existing services and facilities (inc shops, transport, medical) which villages do not, which reduce need to travel • Preferential re water and wastewater • Reduce travel by car • Help achieve aims set out in vision (Theme 1, Theme 5, Theme 9) • Potential for existing facilities to be enhanced • Availability of brownfield land in existing urban areas close to services and public transport • traffic generation perspective - development is concentrated in established urban centres rather than dispersed where access to key services is likely to be poorer • able to facilitate an increased population • enables locally generated needs to be met in sustainable settlements • Beneficial impact on rural area: <ul style="list-style-type: none"> • Ensure character of rural area retained • Better than burdening villages • Must ensure it does not prevent limited development in other settlements to meet

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	<p>specific requirements</p> <ul style="list-style-type: none"> • “Natural development” in villages still required
	<ul style="list-style-type: none"> • No support for additional housing in village in Parish Plan Survey - therefore Option A is only choice
	<ul style="list-style-type: none"> • If development is necessary
Option A - Object	<ul style="list-style-type: none"> • Most large towns (except Buntingford) have access to commercial network of services and do not rely on HCC contracted routes and this is likely to offer most sustainability
Option A - Comments / alternate approaches	<ul style="list-style-type: none"> • Historic market towns have similar rural characteristics to villages and are not supported by significant services and infrastructure to support new major development. Greenfield locations around their boundaries are constrained and do not have the critical mass to accommodate necessary level of housing required to address housing, socio-economic and environmental issues • Fails to meet demands of rural communities • Excessive concentration in towns • Threats to local character and burdens on services • Towns totally congested • Risk that those settlements with railway stations simply accommodate commuters rather than those who work locally
Option B - Support	<ul style="list-style-type: none"> • Inevitable that there will be development in these towns but it is unrealistic to rely on a plan that assumes that this is the only development possible • Add infrastructure stress but will increase accessibility. Town roads already congested and may reach peak unless people switch modes • May also be room for sensitive small scale developments in all settlements, especially affordable housing for family occupation • Include sustainable development to the east of Stevenage, thus reducing development requirements elsewhere • Exclude Buntingford as the town has no railway station nor easy access to a railway service • Complimented by Option F. Most accessible and sustainable locations including Buntingford which is supported by Entec Edge of Settlement Study • Towns would be most appropriate especially Buntingford, Sawbridgeworth and Bishop’s Stortford i.e. those most suitable and able to absorb larger developments with the possibility of using and improving existing services, facilities and transport links particularly near Stansted Airport. Ware and Hertford may have difficulty in expanding with potential for merging albeit on low-lying flooding land • Further consideration should be given to which settlements are considered towns e.g. should include Stanstead Abbots & St Margarets
Option B - Object	<ul style="list-style-type: none"> • Easily accessible to existing services • Higher levels of concentration allow more efficient provision of new services • Reflects PPS1 and PPS3 • Preferable in terms of water and wastewater • Preferable in terms of biodiversity, GI, climate change • Provides flexibility to incorporate GI features & avoid negative effects on biodiversity • Best balance between accessing and supporting viability of existing services and maintaining and increasing accessibility in both towns and larger villages without too much pressure on existing towns • More likely that a network of bus services will exist and be more sustainable • Spread out highway stress and some larger villages have reasonable accessibility • Traffic generation perspective - development is concentrated in established urban centres rather than dispersed where access to key services is likely to be poorer • Safest option to minimise development in Green Belt and countryside • Enables locally generated needs to be met in sustainable settlements

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	<ul style="list-style-type: none"> • Towns totally congested • Overdevelopment in larger villages • Undue pressure on the local road network • Increase car dependency • Significant impact to the Green Belt, landscape and rural character • Strong risk of ribbon development and coalescence • Identified villages are unsustainable • Employment opportunities and infrastructure are not sufficient to support new residents, natural population growth, and major development • Increase in land-take (due to lower density in villages) • Larger villages would be equivalent to towns, yet infrastructure money is funnelled into towns, putting pressure on the voluntary sector to fill the gaps in the villages
Option B - Location Specific	<ul style="list-style-type: none"> • Many of the villages identified in options B and C are on transport corridors (as identified in option F) and as such are vulnerable to the risks of ribbon development or coalescence. These risks outweigh potential to enhance transport services which are inadequate to cope with excessive housing increase from now defunct Regional Plan • Green Belt release required around the larger towns such as Hertford • Revise to include Stanstead Abbots & St Margarets in the highest tier of development • Include sustainable development to the east of Stevenage • Combine Options B and E - concentrating development in these areas would least affect the rural character of the district and at the same time make services etc in the smaller towns of Buntingford and Sawbridgeworth more viable
Option C - Support	<ul style="list-style-type: none"> • Concentrates development in the most sustainable locations in accordance with PPS1 and PPS3 • Best balance between accessing and supporting viability of existing services and maintaining and increasing accessibility of towns and villages • Supported by sustainability appraisal - lead to positive effects by improving overall accessibility to services and meet economic and employment needs • Vital that allocation of houses is based on demonstrable need not pro-rata existing population • Preferable in terms of biodiversity, GI, climate change; provides flexibility to incorporate GI features & avoid negative effects on biodiversity • Provides some flexibility for avoiding significant effects on the historic environment • Most appropriate to meet the challenges facing East Herts and achieve sustainable development • Brings together twin objectives of increasing sustainability and supporting continuing provision in rural areas • Difficult to predict which pubs/shops will succeed or where community based facilities will emerge • Recognises that distribution of housing among villages will not necessarily guarantee success or failure although is some logic for concentrating growth in those villages where there are existing services
Option C - Object	<ul style="list-style-type: none"> • Identified villages are unsustainable; developments in smaller villages not very sustainable • Less non-car transport available, will result in increase in car dependency • Impact on rural setting and character of the villages • Employment opportunities, facilities, and public transport are not sufficient to support new residents, natural population growth, and major development • Object to spread of development around district • Increase land-take (due to lower density in villages) • Result in a more dispersed settlement pattern locating development in many places where local services and transport would be insufficient or even non-existent • Undue pressure on the local road network significant impact to the Green Belt and surrounding landscape

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	<ul style="list-style-type: none"> • Risk of ribbon development and coalescence • Does not allow for natural local development • Tends to force development into areas that do not have good services so are unlikely to be able to support the level of growth needed • Less sustainable from a traffic generation perspective, access to key services, jobs and public transport is likely to be poorer rather than concentrated around established urban centres
Option C - Comments	<ul style="list-style-type: none"> • Misleading - not a true reflection of the Local Plan as Stanstead Abbots & St Margarets is not shown as a main settlement • Sound approach of Local Plan should continue • Need to consider distribution • Allocation based on demonstrated need only within each area - not pro-rata on existing population • Addition of other villages under Option C only if residents want small developments • Fairest option for village - each should play part but in proportion • Key conclusion from Interactive LDF sessions was that growth should be focused in more sustainable and larger settlements, but some smaller villages should receive limited growth to sustain their vitality - sensible approach
Option C - Specific Location	<ul style="list-style-type: none"> • Many of the villages identified in options B and C are on transport corridors (as identified in option F) and as such are vulnerable to the risks of ribbon development or coalescence. These risks outweigh potential to enhance transport services which are inadequate to cope with excessive housing increase from now defunct Regional Plan <ul style="list-style-type: none"> • Revise to include Stanstead Abbots & St Margarets in the highest tier of development • Add appropriately sized extensions to Stevenage and Welwyn Garden City (Option E) thus reducing development requirements elsewhere • Change perceived weakness in terms of accessibility of Buntingford by enhancing passenger transport services • Buntingford - ensure maintenance and viability of local facilities and services without placing too much pressure on the local distinctiveness and character, and provides flexibility for avoiding significant effects on the historic environment • For Ware, would: <ul style="list-style-type: none"> • Minimise amount of development & effect of traffic growth • Maintain character & individual identity • Lead to supportive development in the villages whilst maintain character of Ware and enhancing its environs • Avoid ribbon development and possible coalescence between towns and villages
Option D - Support	<ul style="list-style-type: none"> • Fairest solution that each community will get a building programme proportional to its size • Preferable in terms of biodiversity, green infrastructure and climate change • Provides the flexibility to incorporate green infrastructure features and avoid negative effects on biodiversity • Best balance between accessing and supporting viability of existing services and maintaining and increasing accessibility • Most preferable - inevitably the largest settlements will bear greatest burden but should not deny small settlements chance to grow otherwise they will decay • Limited development in all areas including small villages and hamlets - they have grown to their current size over the years by virtue of local need and need to continue to expand to provide local housing, schools etc
Option D - Object	<ul style="list-style-type: none"> • Strongly opposed - means development in hamlets • Inappropriate - identified villages are unsustainable • Undue pressure on the local road network, encouraging car use • Increase land-take (due to lower density in villages) • Significant impact to the Green Belt and surrounding landscape • Risk of ribbon development and coalescence • Impact on rural setting and character of the villages

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	<ul style="list-style-type: none"> • Employment opportunities, facilities, and public transport are not sufficient to support new residents, natural population growth, and major development • Best represents a balance between need to locate majority of development where it can make good use of existing infrastructure and sustainable transport connections and also direct sufficient development to rural areas so as to maintain and enhance their sustainability • It is likely many new dwellings will have no access or prospect of access to sustainable transport • Even more dispersed than Option F but with lower accessibility • Less sustainable from a traffic generation perspective as access to key services, jobs and public transport is likely to be poorer rather than concentrated around established urban centres
Option D - comments	<ul style="list-style-type: none"> • Precise balance needs to be based on a number of considerations, primarily sustainability of each settlement • Need to consider distribution • Expansion should be fairly distributed across all types of settlement, avoiding ribbon development / over development which can destroy individual character; number of new houses should be proportional to local population • Least worst option • Development should be spread across all areas of population to avoid undue pressure on local services and infrastructure • Main development in towns, less development in service villages and some affordable housing where needed in small villages / hamlets • Development in all villages and hamlets • Development should be mainly affordable to meet the needs of existing residents
Option D - Specific Locations	<ul style="list-style-type: none"> • Revise to include Stanstead Abbots & St Margarets in the highest tier of development • Assuming distribution approach I or II (Q23) but with some development allocated to east of Stevenage and east of Welwyn Garden City • Should include sustainable development to the east of Stevenage, thus reducing development requirements elsewhere • A combination of Options D and F. Preference should be to favour developments that are supported by good transport services that will not depend on major investment, but supplemented with a broader allowance for low and medium density development across the district. This must be moderated to ensure that it does not result in strip developments along these routes that would start to join these settlements. This can be achieved through the use of a green belt approach around settlements such as we have already with a defined envelope.
Option E - Support	<ul style="list-style-type: none"> • Stevenage Borough Council supports Option E insofar as it relates to development at Stevenage • It is important that the planning decisions of surrounding authorities do not restrict or prejudice the future growth and regeneration of Stevenage • Green Belt review will be required (opportunity for joint working) • Easily accessible to existing services and higher levels of concentration will allow more efficient provision of new services • Preferred re water and wastewater • Stevenage and Welwyn Garden City are best equipped to cope with growth - East Herts is not • More sustainable from a traffic generation perspective • Concentrates growth in existing urban areas and extensions to existing towns, thereby locating development in a sustainable location with facilities, services and transport links nearby • Least affect the rural character of the district and at the same time make businesses, shops, and services in the smaller towns of Buntingford and Sawbridgeworth more viable
Option E - Object	<ul style="list-style-type: none"> • Strongly oppose

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	<ul style="list-style-type: none"> • Fails to meet demands of rural communities • Towns totally congested • Undue pressure on the local road network; encourages car use • Significant impact to the Green Belt and surrounding landscape • Strong risk of ribbon development and coalescence • Remote from the housing needs of East Herts • Significant capacity issues at Rye Meads due to internationally designated biodiversity designation
Option E - Comments	<ul style="list-style-type: none"> • Enlarge both of Stevenage and Welwyn • Add infrastructure stress but will increase accessibility. Town roads already congested and may reach peak unless people switch to other modes/smarter choices • Inevitable that there will be development in these towns but it is unrealistic to rely on a plan that assumes that this is the only development possible
Option E - East of Welwyn Garden City	<ul style="list-style-type: none"> • Welwyn Garden City / east of: <ul style="list-style-type: none"> • Also a KCDC but no specific growth requirement • Difficult to service from centrally located services due to distance from town centre (see Welwyn Hatfield's Core Strategy) • Not assist in regeneration of town • Constrained by contamination, ancient landscape, SSSI • Does not take account of abolition of RSS • Premature - housing figure for Welwyn Hatfield yet to be determined • Study should be undertaken to assess suitability of this location and scale of growth • Could result in a disjointed and isolated settlement pattern which is unsustainable • If development is acceptable, East Herts and Welwyn Hatfield Councils need to work collaboratively together • Remote from town centre • Impacts on Mimram and Lee valleys, open elevated landscape and A414 • (see Welwyn Hatfield's Core Strategy Issues and Options 2009)
Option E - Stevenage	<ul style="list-style-type: none"> • Stevenage / east of: <ul style="list-style-type: none"> • Potential for development - all the facilities but not as busy as Harlow • Existing train services could be improved • People want to live there as it has a hospital • Unsustainable as indicated by RSS evidence (e.g. landscape sensitivity) • North and west offer greatest potential in strategic terms • Too large already and destined to become even bigger to west • Landowner confirms substantial land holding east of Stevenage is available for development • Strongly oppose - unsuitable • Will inevitably lead to a take over of Aston by Stevenage Borough Council • Green Belt should be defended to allow villages and surrounding countryside to retain the unique character that is essential for the future success of the district • Area chronically short of water • Will not help East Herts residents / housing need • Would engulf existing villages and simply add to urban sprawl • Stevenage has grown beyond the resources and services available • Landscape constraints over the prominent ridgeline into the Beane Valley
Option F - Support	<ul style="list-style-type: none"> • Second preference - <ul style="list-style-type: none"> • focuses growth within transport corridors allowing future development to be located in close proximity to public transport • reduces the need for car based travel • provides an opportunity to enhance public transport modes by concentrating

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	funding in infrastructure
Option F - Object	<ul style="list-style-type: none"> • Not concentrated enough re water and wastewater infrastructure • Fails to meet demands of rural communities • Ribbon development along major roads and coalescence • Employment opportunities, facilities, and public transport are not sufficient to support new residents, local natural population growth, and major development • Inappropriate because identified villages are unsustainable • Increase car dependency • Impact on rural setting and character of villages • Increase land-take (due to lower density in villages) • Concern with potential for coalescing into towns • Will lose all of village / town characters • Undue pressure on the local road network providing for unsustainable development • Significant impact to the Green Belt and surrounding landscape • Unsustainable - although concentrated along transport links many of the settlements would be too small to have services required to support development • Less sustainable from a traffic generation perspective because development is dispersed across where access to key services, jobs and public transport is likely to be poorer rather than concentrated around established urban centres • Could attract disproportionate number of commuters moving into East Herts from outside the district • Development should reduce journeys by private car - both in urban and rural areas this often means locating development where there are a range of local facilities within walking distance as well as alternatives to the car for longer trips • Would focus on road network and increase car use than if development was just focused at settlements with stations
Option F - Comments	<ul style="list-style-type: none"> • May have some public transport benefits, likely to encourage car use. New access on to primary routes against HCC policy • It is likely that car dependency will be high as any settlements will need to be self sufficient in most respects • New roads required for this option • Closest to planning based on infrastructure but there will be roads with good bus services and/or low congestion outside these that would support development rather than to generalise
	<ul style="list-style-type: none"> • Stevenage Borough Council reserves its position on Option F insofar as it may relate to development on public transport corridors to / from Stevenage
Option F - Specific Location	<ul style="list-style-type: none"> • Option F only makes sense with a Little Hadham bypass • A120 between A10 and Bishop's Stortford should be removed from Option F as it is totally incapable of acting as a transport corridor for traffic generated by adjacent significant new development in addition to current and future traffic loading • Flawed - option F includes A10 north of Hertford/Ware which has poor public transport services with no stations for 10 miles • Highlights that development along transport corridors can be sustainable regardless of level of services each settlement can provide. Hayter Site lies on an identified transport route with the busiest bus route service in the district as well as good access to the rail network • Avoid duplication of infrastructure and transport systems (both rail and road) • On north/south routes to Stansted Airport and M25 • Less cross-country traffic movement into less suitable areas
Miscellaneous	<ul style="list-style-type: none"> • Ranking only information provided in comment box • Ranking information provided in comment box, together with comments • Broxbourne and Harlow Council's welcome continued collaboration on matters relating to future development • Call for Sites assessment must be seen in the wider context including limited

Q22 - Summary Comment	Q22 - Detailed Comment
	<p>capacity within the urban area to accommodate further development</p> <ul style="list-style-type: none"> • To what extent will other Lee valley towns expand? • Promote community based initiatives and provide stronger base for commercial activity • Development Strategy should be in accordance with national planning policy • It would be a tragedy if this part of Hertfordshire were turned into an outer suburb of Greater London. • East Herts has a wonderful rural ambience which must not be compromised - once a piece of land is within the settlement envelope all environmental protection requirements seem to be forgotten (e.g. site clearance) • Allow East Herts to evolve and develop to meet the needs of the community with small scale developments • Developers like big contracts for big profits and smaller work on infrastructure. Should be some leeway. Smaller units of social housing within hamlets should be provided as an element of big contracts • Strongly opposed to any proposals that would encourage or permit individual and isolated sites to be developed. These increase pressure on existing infrastructure and have potential to connect small residential enclaves and increase the urbanisation of Broxbourne Woods • Would it be worth inserting reference to landscape sensitivity and capacity in para 3.6.6 • Nominal 600 dwellings per annum is an 8% increase on the current (old Structure Plan derived Local Plan figure of 555) so it is inevitable that there will be need to be greenfield (and, as a consequence, Green Belt) development between now and the end of the next decade to meet any likely housing requirement.
	<ul style="list-style-type: none"> • Different emphasis needs to be put on sites that are within a town/village boundary as opposed to adding to the edges.
Consultants	<ul style="list-style-type: none"> • Unless consultants live in the area they make a hash of these things
Government	<ul style="list-style-type: none"> • Inform Government that you oppose growth - Government has no interest in Environment
Development Control	<ul style="list-style-type: none"> • Planners need to concentrate on getting things right for the families that live in the area already • Problems with retrospective applications and unwillingness for planners to go to appeal and fight unauthorised development • Need to prevent creeping urbanisation (esp. Broxbourne Woods) • e.g. establishment of barns for agricultural purposes that are then extended and used as a focus/precedent for further housing once the agricultural tie has been removed
Critique of Consultation	<ul style="list-style-type: none"> • Despair at lack of foresight and sensible planning in this area and thought must be given without political bias to how the area should really develop - not just do we need 8,000 homes and split them between towns/villages - lets see some vision not just crass simplistic questionnaire • Chapter 3 adds more smoke than light to debate on housing levels. Difficult to comment in light of policy vacuum; Too overloaded with information and steeped in uncertainty. Portrays what EHDC has already decided as the common good. Must be reviewed against sustainability criteria • Opportunity to revisit Core Strategy timeframe and have 15 year period rather than 30 years starting at 2001
Role of the Council	<ul style="list-style-type: none"> • Council's policies should not be constrained by what was done in the past - need to analyse and plan for what the communities of East Herts really want and need - Government policy indicates a more fluid approach to planning (e.g. community right to build) • The Council should be protecting and furthering the interests of the residents of East Herts
Children's	<ul style="list-style-type: none"> • One centre per 800 children aged 0-5 years

Q22 - Summary Comment	Q22 - Detailed Comment
Centres	<ul style="list-style-type: none"> • Developments of 2,500 require a children's centre
Libraries - General	<ul style="list-style-type: none"> • Statutory service • No libraries proposed to close although opening hours may be reduced
Non-Comments	<ul style="list-style-type: none"> • Reserves the right to comment later
Site Specific Comments	<ul style="list-style-type: none"> • Land at Birchall Lane, east of Welwyn Garden City – unique opportunity for housing after minerals have been extracted
	<ul style="list-style-type: none"> • Thieves Lane Hertford - fits all options submitted with advantage of being in a sustainable location with a reduction in car dependency

Comments received to Q22 in respect of other issues relating to Chapter 3

Q22 - Summary Comment	Q22 - Detailed Comment
Question 23	<ul style="list-style-type: none"> • Allocate new housing proportionately to existing houses • Spread evenly over large/medium/small villages and hamlets then no one place will take full brunt • Aware that additional housing may be necessary but any such development should be based on a fair distribution proportionate to the current footprint
Housing Figures - General	<ul style="list-style-type: none"> • Need to make the case for why we need these houses rather than dividing up an unsubstantiated number in a politically expedient way
	<ul style="list-style-type: none"> • Number of houses is probably about right to meet growth needs with a large part coming from expansion of existing population (older people, smaller families etc)
	<ul style="list-style-type: none"> • Unfortunate the Issues and Options does not specify what the new housing requirement will be and no attempt has been made to quantify this
	<ul style="list-style-type: none"> • East Herts will continue to suffer housing pressure from incomers and this is set to worsen - options presented are short-term. Without significant regional change, any of the options will raise serious issues in respect of the Core Strategy objectives.
	<ul style="list-style-type: none"> • Sympathetic of East Herts' decision at this early stage to round housing 'to-find' figure to 8,500 • Downsizing of housing figure could negatively impact on economic performance. As such the existing RSS should as a minimum be considered in a broader debate • Need for new housing is beyond question - scale and distribution derived from demographic projections. Population expected to rise 16.4% resulting in need for 25.5% increase in households • East Herts will need to justify its housing numbers in order to defend them at examination
	<ul style="list-style-type: none"> • Need for clarity and certainty on the matter of housing figures before options are next put forward for consultation
	<ul style="list-style-type: none"> • Important to establish why some allocated sites have not come forward for development and whether these factors will prevent site from coming forward in the future. If this is the case, then the 'to-find' figure will need to be increased.
Housing Target - Support	<ul style="list-style-type: none"> • In conformity with East of England Plan
Housing Target - Object	<ul style="list-style-type: none"> • Question need for 8,500 houses • East of England Plan been revoked • Housing target scrapped • Question validity of using RSS top-down targets in light of their impending abolition • Don't need to build as many houses • Based on a spurious target • Based on 'predict and provide' which may well be wrong (e.g. 2nd runway at Stansted) • No evidence of need for 8,500 • So many new flats unfinished and unsold
Housing Target -	<ul style="list-style-type: none"> • Should be based on an assessment of local need - not just existing local

Q22 - Summary Comment	Q22 - Detailed Comment
Approach to deriving new target	<p>population</p> <ul style="list-style-type: none"> • Should be based on local population forecasts complimented by an assessment of additional population which each settlement could support in relation to: <ul style="list-style-type: none"> • sustainability of infrastructure • prospects for local job creation to reduce dependency on commuting • limitations on settlement expansion imposed by the Green Belt • Complimentary top-down and bottom-up approach can be taken together and more informed trade-offs made between meeting demand and resulting deterioration in quality of life • Review of housing target would require further iteration of, and consultation on, the Core Strategy and Sustainability Appraisal • Target may need to be increased to reflect any reduction in housing provision in the greater Stevenage area <hr/> <ul style="list-style-type: none"> • Use the SHMA to derive housing target: <ul style="list-style-type: none"> • Bottom-up approach • More accurate • Contains information on likely ages bands and types of housing which could assist in assessing appropriateness of locations, land-take, phasing • Concludes East Herts needs 15,2000 dwellings (current target insufficient)
Standard BS Civic Federation Response (or equivalent)	<p>“None of the options are appropriate because they distribute a housing target that has been scrapped. Demand and its distribution should be based on population forecasts, infrastructure, the Green Belt protection and local employment prospects”</p>
Object to development in East Herts	<ul style="list-style-type: none"> • No development (including because): <ul style="list-style-type: none"> • Housing density too high • Too congested • Poor infrastructure • No target • Only people to profit are developers • Why should we overcrowd our existing towns and villages • Infinite growth is impossible - can't manage population growth so stop or decrease it now
Population and Demographics	<ul style="list-style-type: none"> • Already too many people and cars in East Herts • No more houses in UK (static population) • Strict limit on immigration and control illegal immigration • Need to look at why we are over-populated in this area • Tackle world population explosion • Campaign to limit immigration: fewer people = fewer houses • Change of Government may discourage the trend of migration to the southeast from other less populated areas of the UK and beyond thereby removing the demand for many of these houses
Elsewhere in UK	<ul style="list-style-type: none"> • Develop houses in (depressed) areas of UK that need jobs • Reject Government policy to develop southeast without regard for jobs • Economic regeneration of areas of high unemployment outside of southeast rather than the destruction of areas of great beauty • Provision should be made for where the demand is e.g. north London • Any site close to the Olympics area to utilise the services and infrastructure
East of England Plan	<ul style="list-style-type: none"> • Development strategy needs to be kept under review following legal challenge to East of England Plan <hr/> <ul style="list-style-type: none"> • Assume 8,500 is based on East Herts estimation of housing need and not cancelled East of England Plan <hr/> <ul style="list-style-type: none"> • Broadly support uses of the housing figure in the East of England Plan rather than the figure in the emerging Draft Review. However, following abolition of RSS, future district housing requirements will need to be derived locally and based on

Q22 - Summary Comment	Q22 - Detailed Comment
	local need
Sprawl	<ul style="list-style-type: none"> • Concern that growth will lead to urbanisation, ribbon development and urban sprawl causing loss of rural nature, settlement character, and quality of life
Density	<ul style="list-style-type: none"> • In terms of transport provision, higher densities are favoured as these are more likely to be commercially viable • No mention of SHMA Viability Study which looks at impact of different densities • No information how the density figures were compiled - multiplied based on 20dph (gross) which is crude • Density needs to be increased in order to discourage expansion in villages • No longer prescriptive target - local target must be identified and based on evidence <hr/> <ul style="list-style-type: none"> • Object to town cramming which has resulted in flats, traffic congestion and deterioration of character and quality of life • Should be space / flexibility to encourage small shops and businesses
Brownfield / Infilling Capacity	<ul style="list-style-type: none"> • No more dwellings that can be accommodated on brownfield land • Prioritise development on brownfield land before Green Belt • Unconvinced brownfield sites have been utilised <hr/> <ul style="list-style-type: none"> • Use spaces for infilling first <hr/> <ul style="list-style-type: none"> • Strongly object to use of undeveloped green spaces (e.g. parks, playing fields and allotments) which contribute to the openness and character of settlements and provide essential amenities and leisure facilities <hr/> <ul style="list-style-type: none"> • HCA Study results not been utilised for consultation - which is misleading especially since it gives radically different results to Call for Sites <hr/> <ul style="list-style-type: none"> • Dangerous and naïve to base capacity assumptions on Call for Sites
Existing Housing Stock / Empty homes	<ul style="list-style-type: none"> • Better use of existing housing stock/re-use of empty homes: <ul style="list-style-type: none"> • No need for further expansion when empty houses/flats • Prevent destruction of countryside • Re-use derelict / empty homes (1,500 in East Herts) including unused office blocks and empty properties above shops • Maximise occupancy of existing houses • Compulsory purchase / grant funded • Increase empty property tax • New law to force sale of empty properties • Prevent long term empty properties anywhere in UK • Build on derelict land in places like Stevenage, Watford, Welwyn Garden City where there are lots of disused factories
Housing Need	<ul style="list-style-type: none"> • Not solely about number of dwellings sizes of dwellings - tenure and affordability are critical <hr/> <ul style="list-style-type: none"> • Ratio of population to household growth suggests bulk of new housing will be for single people which is contrary to demographic evidence commissioned by Council
Local Housing	<ul style="list-style-type: none"> • Restrict housing to local people not in-migrants, commuters e.g. Lake District, Isles of Scilly
Housing sizes	<ul style="list-style-type: none"> • Larger houses in villages - smaller units in towns • Emphasis on family accommodation
Support development in Green Belt	<ul style="list-style-type: none"> • Inevitable that there will need to be greenfield and Green Belt releases • Unrealistic to locate development outside of Green Belt especially if development is to take place in the four towns • Development should be adjacent to the towns as these are the most sustainable locations • Agree that options should not avoid Green Belt
Object to development in Green Belt	<ul style="list-style-type: none"> • Protect Green Belt (including): <ul style="list-style-type: none"> • Sacrosanct and should be kept for posterity • No development

Q22 - Summary Comment	Q22 - Detailed Comment
	<ul style="list-style-type: none"> • Protect countryside and open spaces for future generations • Preserve historic character of towns and villages • Protect for local agriculture • All development should be outside of Green Belt as there is little evidence of need for housing within Green Belt • Vital role in preventing urban sprawl • Should be last resort - re-use urban brownfield, urban greenfield, brownfield and greenfield outside settlements • Since fewer houses required, section on Green Belt needs to be reconsidered • Invaluable constraint on land use and development and was set up to deter the natural attraction of concentrations of populations leading to further migration to those areas and creating an almost exponential trend • The availability of Green Belt land therefore discourages building on previously developed land which should be the preferred option
Green Belt - Specific Locations	<ul style="list-style-type: none"> • Greater reference to Green Belt Review at Stevenage • Greater reference to Green Belt Review at Welwyn Garden City • Review of Green Belt adjacent Broxbourne Borough • Strongly oppose erosion of Green Belt at Stanstead Abbots • Strongly oppose review of Green Belt east of Stevenage
Green belt Review	<ul style="list-style-type: none"> • Boundaries subject to review in accordance with PPG2 • Must only be reviewed as a one-off event otherwise it ceases to serve its function • Green Belt "Review" is an euphemism - question is how much land is to be released and where • LPAs should take account for the need to promote sustainable patterns of development when redrawing Green Belt boundaries • Issues and Options does not contain any criteria setting out how a Green Belt review will be conducted - a major omission • Reasons for undertaking a Green Belt review are not set out in the consultation nor are the constraints to development (i.e. PPG2). • Why has HCA work been ignored
Need for Green Belt Review - no justification	<ul style="list-style-type: none"> • No justification whatsoever to support the assertion that there is insufficient capacity within the settlements • No mention of HCA which is highly misleading • Implication that there is insufficient land within towns to accommodate expansion is worrying - vital to emphasise need to preserve rural nature and protect small villages from neighbouring towns expansion
Employment	<ul style="list-style-type: none"> • No reference to latest available economic projections which projects increase in jobs of 10,000 over the period 2001-2021 and 2001-2031. Some concern for the longer term economy of the district • No consideration as to the potential role of strategic employment sites • No reference to the importance of a low carbon economy to the future economy of the district • Explanation as to why jobs to homes ratio of 0.81 is considered robust • Little information in Issues and Options about how many jobs will be created locally. Inevitable that some new homes will be occupied by commuters but should concentrate on building new homes for those who work locally - will also reduce car journeys to work • Jobs target is equally flawed as it is based on housing target that will change • Need to balance jobs with houses • Question of where to put 8,500 homes is highly misleading - no mention is made of where people might find work or how they may get to work. Need to do this in a reasonable time and cost • Future housing should be built with employment and transport and other support services (e.g. Harlow and Stevenage)

Q22 - Summary Comment	Q22 - Detailed Comment
	<ul style="list-style-type: none"> • Fantasy - more houses = more jobs • No jobs at moment? <hr/> <ul style="list-style-type: none"> • Expansion of settlements should have a degree of linkage to expansion of employment. Inevitably, will continue to be commuting but growth in accommodation for employment in London should be avoided particularly since it would eventually lead to pressure to increase public transport capacity, noticeably rail <hr/> <ul style="list-style-type: none"> • Already a large amount of empty B1 office space in our high streets and town centres. Efforts should be made to promote the uptake of empty office space which would also assist in desire to reduce out-commuting and the overall need to travel

Comments received to Q22 in respect of other Chapters

Chapter 1: Background and Context

Summary Comment	Detailed Comment
Question 1 - Sustainability Appraisal	<ul style="list-style-type: none"> • SA notes that villages have become dormitory settlements • Unclear why all directions around settlements have not been consulted on at this stage and why no reasons have been given for not doing so. SA should identify and assess all reasonable alternatives - does not appear to have done so

Chapter 2: Key Issues and Vision

Q22 - Summary Comment		Q22 - Detailed Comment
Theme 1: East Herts Energy & Climate Change	SFRA	<ul style="list-style-type: none"> • Must pay full regard to flood risk issues caused by future development options along route of River Lee through Broxbourne • Avoid building on floodplain • SFRA should be used to inform which areas to develop using sequential test to allocate sites
	Environmental infrastructure	<ul style="list-style-type: none"> • Important to recognise potential risk/benefits associated with many small/dispersed developments versus few large developments. Cumulative impacts of development will need to be planned for to ensure environmental infrastructure is upgraded in line with development. This can be overlooked when many small developments occur.
	Greenhouse gas emissions	<ul style="list-style-type: none"> • Welcome the documents acknowledgement that built environment is a significant source of greenhouse gas emissions as well as transport
Theme 3: Housing East Herts	Adult Care Services - General	<ul style="list-style-type: none"> • Requires commissioning of suitable housing-based services e.g. extra care and less reliant on commissioning residential based care • Significant number of new services could use existing buildings currently used for other purposes • Service changes could reduce need for new buildings • Demand for residential care but preference for flexicare above care homes • Mental Health - significant under provision has resulted in out of district placement • Physical Disabilities - better use of existing accommodation and development of schemes for <ul style="list-style-type: none"> • younger people to enable them to live independently • Day Care - sufficient accommodation • Learning disabilities <ul style="list-style-type: none"> • Larger settlements preferred (transport and lower risk of isolation) • Small developments (6-12 units) of 1-2 beds • Non-institutional in appearance • Accessible location close to family and friends, shops, transport and amenities • On site communal facilities
		<ul style="list-style-type: none"> • Maximum need across all care groups: <ul style="list-style-type: none"> • Social Rented / Public - 547 • Privately Financed - 697 • HCC would support in general private schemes across the district <ul style="list-style-type: none"> • Large enough to be financially viable / balanced community model (60 units) • Lifetime Homes standards • Ancillary facilities provided • Near shops and other local amenities, good transport links, relatively flat and navigable • Links to existing community resources

Q22 - Summary Comment		Q22 - Detailed Comment
Theme 4: East Herts Character	Impact on rural area	<ul style="list-style-type: none"> • Impact of huge quantities of housing have a devastating impact on rural area
	Character	<ul style="list-style-type: none"> • Current growth objectives are unsustainable and will ruin character and quality of life in East Herts
	Question 9 - Objectives	<ul style="list-style-type: none"> • Strongly support CHA1 - CHA4 • No explanation how the Council's approach to broad locations ties in with CHA1 - Core Strategy should have policy options that maintain openness of whole of rural area
Theme 5: Economy, Skills & Prosperity	East Herts - Primary and First Education	<ul style="list-style-type: none"> • Generally: <ul style="list-style-type: none"> • schools to the north have spare capacity • schools to the south are full • HCC would support policies that promote affordable housing in villages which would assist in supporting local schools
	Retail Floorspace	<ul style="list-style-type: none"> • Development Strategy fails to outline the future type and level of retail floorspace needed and what this means for the location of future growth in the District
Them 6: East Herts On the Move		<ul style="list-style-type: none"> • Focused on existing services and good transport links • not depend on major investment
		<ul style="list-style-type: none"> • Tewin is well used in the morning as a rat-run but has poor quality roads that are too narrow for drivers in a hurry
		<ul style="list-style-type: none"> • Scale of growth proposed could have an impact on the strategic road network, particularly in combination with planned growth in neighbouring districts, however, degree and nature of impact will depend on strategy that is taken forward
		<ul style="list-style-type: none"> • Need for bypass increases with traffic volumes - more housing along road like A602 will increase demand for bypass which is counter productive
		<ul style="list-style-type: none"> • Until an east/west road is constructed from Stevenage to Bishop's Stortford, all development north of a line on a latitude of Puckeridge must be ruled out. Economics dictate building close to current services (rail/road). The access to Stansted is appalling north of the county.
		<ul style="list-style-type: none"> • Develop train connections for larger service villages
		<ul style="list-style-type: none"> • Only towns with good transport links (rail) to London - other options encourage car use
		<ul style="list-style-type: none"> • Look at areas with enough parking
		<ul style="list-style-type: none"> • Although road congestion is highlighted, the Core Strategy should also refer to rail congestion at St Margarets where peak trains are at capacity. Capacity on the line is also limited because it is a branch line and single track in places
		<ul style="list-style-type: none"> • Development that promotes commuting is not sustainable
Theme 7: Health, Wellbeing and Play	Village vitality	<ul style="list-style-type: none"> • Pubs thrive because they are used extensively by people outside the village and perversely, they will be damaged by significant development inside the village. Pubs will not be sustained solely by development inside the village

Q22 - Summary Comment		Q22 - Detailed Comment
Theme 8: Green East Herts	Lee Valley Regional Park	<ul style="list-style-type: none"> • Park is a key leisure, open space and recreational resource in relation to climate change mitigation and adaptation, flood water management, and the conservation and enhancement of biodiversity and scarce resources such as water and open space • Green Belt south of Ware and adjacent to Stanstead Abbots forms part of Lee Valley Regional Park and should be protected from non-leisure related development
	Broxbourne Woods	<ul style="list-style-type: none"> • Real danger that imposition of large numbers of housing in Hertfordshire will seriously impact on the ancient woods and their immediate surroundings
	Minerals and Waste	<ul style="list-style-type: none"> • Reference should be made to advanced stage of preparation on Waste Core Strategy and Minerals Local Plan • Whichever housing figures are used, growth must consider the impact of waste generation which needs to be appropriately managed
	Waste Management	<ul style="list-style-type: none"> • No specific mention of HWRC in I&O document • Existing 3 Household Waste Recycling Centres (HWRC) are operating at the limit of their capacity, if not beyond • Would be difficult to cope without improvement with demands from additional housing • BS ASRs would require new facility to west side of town (see Draft Municipal Waste Spatial Strategy 2009) • Waste Transfer Station needed for east of the county • Sites at Westmill and Presdales Pit could be appropriate • Helpful if Core Strategy could identify and acknowledge role that new sites could play in providing suitable facilities to serve communities • No mention of provision of alternative waste treatment facilities (final nor composting/ recycling)
Theme 9: East Herts Monitoring and Delivery	Existing infrastructure at capacity / not adequate	<ul style="list-style-type: none"> • We do not have the infrastructure to cope with an influx of large numbers of new homes. • Impact on: <ul style="list-style-type: none"> • Schools • Water • Sewerage • Healthcare - doctors, dentists, hospitals • Leisure • Roads - congested and at capacity • Buses • Trains - overcrowded • Local jobs / employment • Power supply • No more building of new houses until capacity of infrastructure / infrastructure plans in place (e.g. water & sewerage) especially development that causes abstraction from River Beane
	Need to ensure adequate infrastructure	<ul style="list-style-type: none"> • Impact of development on infrastructure • Considerable infrastructure improvements required before development occurs • Proper assessment of infrastructure • Quantum of housing has significant bearing on infrastructure • Infrastructure a pre-requisite for any development • Infrastructure and growth need to be planned together on a strategic basis • Risk of loss of quality of life because infrastructure will never catch up with unsustainable levels of growth • Need to attract industry to provide jobs • Specific plans should be in place for service and infrastructure organisations to provide additional capacity

Q22 - Summary Comment		Q22 - Detailed Comment
		<ul style="list-style-type: none"> • Where will extra rubbish go?
	General infrastructure issues affecting development strategy	<ul style="list-style-type: none"> • Infrastructure within towns cannot cope with growth • Water and wastewater - easier to provide the necessary infrastructure for a small number of large clearly defined sites • More efficient water retention • Balance needs to be struck as most of the large towns lie within the catchment of Rye Meads • Await results of 2011 census in order to project needs for future infrastructure realistically • Scale of development - significant infrastructure investment required (transport, schools, hospitals) • Impact of current economic climate • One of the driest areas of the country - there is not sufficient water for current population and cannot cater for extra houses without an increase in water supplies
	Location specific infrastructure issues affecting development strategy	<ul style="list-style-type: none"> • Medium/longer term - if the northern portion of East Herts is to be further developed must resolve traffic management - A1M/A505 eastwards (Baldock, Cottered, Cromer, Buntingford) to Stansted Airport and ease smaller villages northwards) • All options likely to increase pressure on water resources (which are already highly stressed). Further abstraction could reduce groundwater flow which supplies rivers upstream. Reduction in river flow could affect the balance of biodiversity within river corridors as well as reducing quantity of water available for abstraction. Could adversely impact Lee Valley SPA.
	Infrastructure and Core Strategy	<ul style="list-style-type: none"> • Not enough information about infrastructure in Core Strategy • Problem with the East of England Plan approach was that it almost ignored infrastructure capacity issues • Infrastructure issues are mentioned in sustainability appraisal but not mapped out in Core Strategy

Chapter 4: Bishop's Stortford

Q22 - Summary Comment		Q22 - Detailed Comment
Primary Education		<ul style="list-style-type: none"> • 1.5 FE surplus by 2014/15: <ul style="list-style-type: none"> • but largely in one school • most schools full at Reception • Estimated that surplus will be taken up by future demand of existing community
		<ul style="list-style-type: none"> • If ASR's provide 3,000 homes, a 5FE will be required and expected that ASR's will meet their own school capacity
		<ul style="list-style-type: none"> • If High School relocates and existing school developed for housing, flexibility should be provided to enable expansion of Thorley Hill Primary School
Bishop's Stortford and Sawbridgeworth - Secondary Education		<ul style="list-style-type: none"> • Less than recommended 5% surplus (although additional limited boarding spaces have not been accounted for) • Additional need for secondary school capacity • Supports relocation and expansion of 2 Bishop's Stortford High Schools to 8FE each to meet future demand
Adult Care Services		<ul style="list-style-type: none"> • Older People's Services (Flexicare) - 85-100 • Mental Health Services - Pressing need (no units in this area) i.e. 1-bed flats • Learning Disability Services - target location
Youth Connexions		<ul style="list-style-type: none"> • Existing site is reasonable size and centrally located but requires significant investment
Libraries		<ul style="list-style-type: none"> • Centrally located but undersized (one of busiest in county)
Bishop's Stortford – other comments		<ul style="list-style-type: none"> • Growth options for the towns should not be mutually exclusive as it is likely that combinations of several options may be the most viable way of

Q22 - Summary Comment	Q22 - Detailed Comment
	accommodating the required growth
	<ul style="list-style-type: none"> Green Belt release constrained by: <ul style="list-style-type: none"> sensitive woodland (Birchanger Wood) lack of defensible boundary due to distance to M11 sloping landscapes and potential aircraft noise (particularly to the south)
	<ul style="list-style-type: none"> Review Green Belt to south of Bishop's Stortford to enable town to grow to 2031
	<ul style="list-style-type: none"> Opposition to growth: <ul style="list-style-type: none"> Has enough housing Does not have the infrastructure Absorbed too much East Herts housing 1991-2011
	<ul style="list-style-type: none"> Housing growth: <ul style="list-style-type: none"> Informed bottom-up assessment of housing demand based on local population estimates and assessment of infrastructure, employment, Green Belt Conclude that Stortford neither needs nor can support 4,000 dwellings
	<ul style="list-style-type: none"> Good transport links
	<ul style="list-style-type: none"> Unclear why all directions around settlements have not been consulted on and why no reasons have been given for not doing so
	<ul style="list-style-type: none"> Bishop's Stortford and Sawbridgeworth are already overdeveloped so why would we want more houses. Airport expansion not going ahead so where are jobs for new owners/renters
	<ul style="list-style-type: none"> Substantial areas of undeveloped land on the northern fringes to accommodate growth

Chapter 5: Buntingford

Q22 - Summary Comment	Q22 - Detailed Comment
First Tier Education	<ul style="list-style-type: none"> Some surplus to cater for any additional demand although additional 1/2FE may be required
Buntingford and Puckeridge - Middle Tier Education	<ul style="list-style-type: none"> No capacity within existing schools to cater for additional need Further work required to establish whether existing sites could be expanded
Upper Tier Education	<ul style="list-style-type: none"> Freman College: <ul style="list-style-type: none"> Full in 2010 and further capacity required to meet need Potential expand to north by relocating existing playing fields further north Land not in HCC ownership
Adult Care Services	<ul style="list-style-type: none"> Older People's Services (Flexicare) - 40-60 Mental Health Services - Pressing need (no units in this area) i.e. 1-bed flats
Youth Connexions	<ul style="list-style-type: none"> Existing building inadequate for expanding youth population - alternative shared or new facility required
Library	<ul style="list-style-type: none"> Accessible location on High Street (space to rear inaccessible)
Buntingford – other comments	<ul style="list-style-type: none"> Growth options for the towns should not be mutually exclusive as it is likely that combinations of several options may be the most viable way of accommodating the required growth Unclear why all directions around settlements have not been consulted on and why no reasons have been given for not doing so Should not be given same status as larger towns - reasons include: <ul style="list-style-type: none"> Small size Number of historic buildings No rail link and lack of road capacity Lack of facilities and amenities (employment and education) Greenfield development constrained by physical boundary and topographical issues

Q22 - Summary Comment	Q22 - Detailed Comment
	<ul style="list-style-type: none"> • Preferred area for development ensuring transport links are improved • Main concern is that Buntingford is given same status as larger towns and higher up settlement hierarchy than Stanstead Abbots which is more sustainable and is in a better position to accommodate more growth in accordance with Core Strategy objectives. Currently a second tier settlement along with Stanstead Abbots • Results of Interactive LDF Sessions are concerning: suggest that 1,000 homes should be built in Buntingford which would increase its population by over 50%. This level of growth is considered to be too much given the physical, environmental and socio-economic constraints. Such an increase would have a detrimental impact on historic character and rural setting • If a significant level of development is to be allocated to Buntingford, a detailed assessment needs to be undertaken and consulted upon (e.g. transport and highways issues) so residents can understand impact. • If growth is proposed to the north, it is extremely limited in terms of vehicular access to town centre and suffers from congestion and road safety issues • Should be made into a much larger town/city concentrating infrastructure • Some growth possible but no rail link • Far poorer range of facilities than other towns and no rail link. Town is already dominated by car trips and significant net out-commuting. Tests poorly in respect of sustainable development. • Must not give too much weight to outcome of LDF Interactive Sessions - Buntingford came out as second popular behind Hertford and above Bishop's Stortford. Council must take a balanced view • Council must recognise that Buntingford does not have a station and therefore should not be included • Stand alone town with no larger service villages nearby - on a transport corridor and having space to take a separate settlement with its own identity. • Identified as a location where traffic impact to the strategic road network as a result of new development is likely to be low • Sainsbury's Depot - good transport link A10 • Most suitable as it would benefit Bedford, Royston, Hitchin, Stevenage - although A1(M) would have to be widened making Lister Hospital more easily available to customers in the catchment area • Not near any large towns - careful development here alone could be sympathetically done with increase in amenities • Chelmer Model projects loss of 400 people (due to reduction in household size) - decline of population could be countered by identifying Buntingford as a focus for new housing growth to support local service provision and help ensure town remains a sustainable and vibrant community that serves its wider rural hinterland. • Further housing development would not affect existing Green Belt and would accord with national policy of focusing growth in sustainable urban locations • The purpose of the Entec report was to identify examples of sites in edge of settlement locations that demonstrate what types of areas might be released for housing and to draw broad conclusions on the suitability of sites. Eighteen sites throughout East Herts were considered, excluding areas of national ecological and archaeological constraint, including Buntingford West. It concluded that urban extensions close to the centre of larger existing settlements are typically more sustainable than sites extending from the edge of smaller settlements or sites more distant from settlement centres. • The site was chosen by Entec as it has clearly defined boundaries formed by the A10 and existing residential areas, is not affected by any of the significant constraints identified in the Entec study which included ecological designations, flood risk, landfill, other land use allocations, TPO's and

Q22 - Summary Comment	Q22 - Detailed Comment
	<p>archaeological designations.</p> <ul style="list-style-type: none"> • In terms of sustainability criteria the Entec report noted that the Buntingford West site is within a 10 minute public transport accessibility contour for a First school and GP surgery, a 20 minute contour for retail land uses and a 10 minute contour for employment land uses . In view of good footpath and cycle connections from the site, these walking times to these nearby facilities would be far less than waiting for and catching a bus for example. • The Habitats Regulation Assessment supports development in Buntingford: “with the exception of Buntingford, development at all the towns and most larger villages, plus the area north of Harlow creates some potential for increased recreational pressure on Wormley-Hoddesdonpark SAC and the Lee Valley SPA/RAMSAR. • Sustainability appraisal notes that development in the main towns will help to maintain and improve the viability of local services such as retail, education and public transport which would also benefit the surrounding rural area. Buntingford is the main town and service centre for the northern part of East Herts and would help to protect the character of the rural hinterland in the northern part of the district. • Does not raise Green Belt issues • Results from the LDF Interactive Sessions 2008 concluded that Buntingford ranked second to Hertford as preferred development location, where development was generally focused on the larger towns, especially along transport corridors. • Lacks a critical mass but has a beautiful town centre that would benefit substantially from the expenditure of another 600-800 families (40 dwellings per annum over 20 years is sustainable and achievable by the development industry) • Should growth continue to be allocated in its historical pattern or whether one should sow the seeds of a sustainable growth location that can help meet the needs of the district for the next 50 years

Chapter 6: Hertford

Q22 - Summary Comment	Q22 - Detailed Comment
Primary Education	<ul style="list-style-type: none"> • 2FE shortage in short-term: <ul style="list-style-type: none"> • Provision of 1FE permanent need • Provision of 1FE temporary need • Any new housing likely to generate additional demand - identify reserve schools sites through LDF (e.g. Mangrove Road inc relocation of cricket club)
Hertford and Ware - Secondary Education	<ul style="list-style-type: none"> • Additional capacity may be required in medium term • From 2014/15 less than recommended 5% surplus • Capacity needs to be increased by 0.5FE for 2014/15 • Capacity needs to be increased by 2FE by 2023/24 • Flexible policies required to allow for expansion as 3 schools in Green Belt • Additional playing fields required at Chauncey, Presdales and Richard Hale (could be detached or all-weather)
Library	<ul style="list-style-type: none"> • Central location and due to relocate 2011
Adult Care Services	<ul style="list-style-type: none"> • Older People’s Services (Flexicare) - two new schemes in development should satisfy long-term need • Learning Disability Services - target location
Hertford and Ware - Youth Connexions	<ul style="list-style-type: none"> • Neighbourhood facilities currently used but would look to develop a site in partnership located to the east of Hertford that could also serve Ware
Hertford – other comments	<ul style="list-style-type: none"> • Growth options for the towns should not be mutually exclusive as it is likely that combinations of several options may be the most viable way of accommodating the required growth

Q22 - Summary Comment	Q22 - Detailed Comment
	<ul style="list-style-type: none"> • Unclear why all directions around settlements have not been consulted on and why no reasons have been given for not doing so • Approaching capacity • Green Belt land release constrained by potential flooding issues, sensitive wildlife and ancient woodland sites and a congested existing infrastructure network • Overdeveloped but no extra shops etc • Well placed in respect of public transport (bus station and 2 rail stations) with excellent connections to nearby towns and London - therefore principle foci for growth

Chapter 7: Sawbridgeworth

Q22 - Summary Comment	Q22 - Detailed Comment
Primary Education	<ul style="list-style-type: none"> • Shortage of capacity - 2FE required • New housing likely to generate demand • Existing sites unable to expand • Potential for Mandeville to expand to 2FE through acquisition of adjacent land (not in HCC ownership) • Some capacity at Spellbrook and High Wych
Bishop's Stortford and Sawbridgeworth - Secondary Education	<ul style="list-style-type: none"> • Less than recommended 5% surplus (although additional limited boarding spaces have not been accounted for) • Additional need for secondary school capacity • Supports relocation and expansion of 2 Bishop's Stortford High Schools to 8FE each to meet future demand
Adult Care Services	<ul style="list-style-type: none"> • Older People's Services (Flexicare) - future schemes required given expected increase in older population
Youth Connexions	<ul style="list-style-type: none"> • Existing facility would need to be expended if significant population growth occurs
Sawbridgeworth – other comments	<ul style="list-style-type: none"> • Growth options for the towns should not be mutually exclusive as it is likely that combinations of several options may be the most viable way of accommodating the required growth • Unclear why all directions around settlements have not been consulted on and why no reasons have been given for not doing so • Bishop's Stortford and Sawbridgeworth are already overdeveloped so why would we want more houses. Airport expansion not going ahead so where are jobs for new owners/renters • Green Belt land release could lead to coalescence with surrounding settlements • Constrained by local road and rail network capacity issues • Good transport links • Already provides a full range of shops, services and employment opportunities • A carefully designed and well planned extension of the existing town provides an excellent opportunity to add to and improve the existing medical facility at the Thomas Rivers hospital - a major employer in the district. In addition, the land to the north can deliver sustainable retirement accommodation and/or housing

Chapter 8: Ware

Q22 - Summary Comment	Q22 - Detailed Comment
Primary Education	<ul style="list-style-type: none"> • Sufficient short-term capacity • 1/2FE over plan period to cater for needs of existing population • New housing likely to generate additional demand

Hertford and Ware - Secondary Education	<ul style="list-style-type: none"> • Additional capacity may be required in medium term • From 2014/15 less than recommended 5% surplus • Capacity needs to be increased by 0.5FE for 2014/15 • Capacity needs to be increased by 2FE by 2023/24 • Flexible policies required to allow for expansion as 3 schools in Green Belt • Additional playing fields required at Chauncey, Presdales and Richard Hale (could be detached or all-weather)
Adult Care Services - Ware	<ul style="list-style-type: none"> • Older People's Services (Flexicare) - future schemes required given expected increase in older population • Mental Health Services - Pressing need (no units in this area) i.e. 1-bed flats • Learning Disability Services - target location
Hertford and Ware - Youth Connexions	<ul style="list-style-type: none"> • Neighbourhood facilities currently used but would look to develop a site in partnership located to the east of Hertford that could also serve Ware
Library	<ul style="list-style-type: none"> • Excellent location adjacent to car park • Listed building with limited disabled access • S106 contributions being pooled to relocate to premises to rear
Ware – other comments	<ul style="list-style-type: none"> • Growth options for the towns should not be mutually exclusive as it is likely that combinations of several options may be the most viable way of accommodating the required growth
	<ul style="list-style-type: none"> • Unclear why all directions around settlements have not been consulted on and why no reasons have been given for not doing so
	<ul style="list-style-type: none"> • Although it is acknowledged that development is more sustainable in the towns, having regard to Ware, capacity is very limited and there will need to be significant greenfield development: therefore valid reasons for developing in villages
	<ul style="list-style-type: none"> • Approaching capacity
	<ul style="list-style-type: none"> • Green Belt release is constrained by flooding issues, Registered gardens, a wildlife site, coalescence issues and potential noise/environmental impacts caused by its proximity to A10 • Available brownfield sites already turned into flats turning Ware into a dormitory town with a large number of residents who care little for the community but demand use of all facilities. • Development to the south has recreational and environmental benefits and contrary to other Core Strategy claims. • Significant issues: water, sewerage, health (A&E), police, schooling, roads and congestion, lack of buses, overcrowded trains. • Will G&T and social tenants queue jump above existing local residents? • Situation for Ware looks very bleak indeed • Overdeveloped but no extra shops etc

Chapter 9: Villages

Q22 - Summary Comment	Q22 - Detailed Comment
Primary Education	<ul style="list-style-type: none"> • Little Munden - new housing likely to generate demand
	<ul style="list-style-type: none"> • Furneux Pelham - no spare capacity but not a constraint on limited development in village
	<ul style="list-style-type: none"> • Little Hadham - school could be extended to 1FE but increased site would be required (HCC in negotiations will adjacent landowner to acquire land)
	<ul style="list-style-type: none"> • Much Hadham - full in most year groups and limited capacity to cater for any need arising from further development. Expansion of Little Hadham could assist.
	<ul style="list-style-type: none"> • Albury - some spare capacity but new housing likely to generate additional demand
	<ul style="list-style-type: none"> • Watton-at-Stone - Reserve land to expand to 2FE to provide capacity to meet demand from additional development
	<ul style="list-style-type: none"> • Hunsdon - full in most year groups
	<ul style="list-style-type: none"> • High Cross (Puller Memorial) - places available. Development that would

Q22 - Summary Comment	Q22 - Detailed Comment
	<p>increase number of pupils at the school would be welcomed. Some deficiency in built development that could be addressed through S106</p> <ul style="list-style-type: none"> • Stanstead Abbots - full and oversubscribed. No capacity to accommodate additional demand and site will not enable expansion. Additional development will require additional 2FE site to enable relocation and expansion • Thundridge - full in most year groups taking children from local area and Ware. Accommodating needs from the village may be possible but may impact upon pattern of accommodating children from elsewhere • Wareside - takes children from village and local area. Capacity not a constraint to limited development in village • Bayford - full in most year groups and takes children from Hertford, Hoddesdon and Cheshunt. Small amount of housing would have an impact on both the school and the pattern of accommodating children from elsewhere • Widford - takes children from village and local area. Capacity not a constraint to limited development in village • Hertford Heath <ul style="list-style-type: none"> • Full in most year groups. • Caters for children from Hertford Pinehurst estate (transferred when The Pines School closed) and children attend from Hoddesdon. • No capacity to accommodate children from any additional development • Site unable to expand • Further housing may impact on pattern of accommodating children from outside village • If further housing is proposed, 2FE capacity required to relocate and expand existing school • Hertingfordbury - takes children from local area, Hertford and Welwyn. Accommodating children from new housing development may be possible but could impact on pattern of accommodating children from outside village • Stapleford - full in most year groups, taking children from local area, Hertford and Watton-at-Stone. Accommodating children from new housing development may be possible but could impact on pattern of accommodating children from outside village • Tewin - additional development will require additional capacity • Tonwell - enough children in village to fill the school in reception but many travel out of village to Ware and Hertford • Datchworth - full, taking children from local area Stevenage, Knebworth, Watton-at-Stone, Welwyn, Welwyn Garden City. Accommodating children from new housing development in Datchworth may be possible but could impact on pattern of accommodating children from outside village • Aston - takes children from both the village and the local area. Capacity would not constrain limited development in village • Benington - takes children from both the village and the local area. Capacity would not constrain limited development in village
<p>Villages - First Tier Education</p>	<ul style="list-style-type: none"> • Small amount of surplus capacity to cater for additional need arising from any new development but further work required to assess whether capacity of existing schools can be increased • Antsy - takes children from both the village and the local area - capacity would not be a constraint on limited amount of development • Hormead - takes children from both the village and the local area - capacity would not be a constraint on limited amount of development • Braughing - takes children from both the village and the local area - capacity would not be a constraint on limited amount of development • Walkern - takes children from local area and Stevenage. Accommodating

Q22 - Summary Comment	Q22 - Detailed Comment
	children from any new development may be possible but could impact on pattern of accommodating children from outside village
Buntingford and Puckeridge - Middle Tier Education	<ul style="list-style-type: none"> • No capacity within existing schools to cater for additional need • Further work required to establish whether existing sites could be expanded
Youth Connexions	<ul style="list-style-type: none"> • Local facilities used for limited programmes • Appropriately designed community facilities required if significant population growth occurs • Mobile project targets villages during holidays
Library	<ul style="list-style-type: none"> • Mobile library (based in Cheshunt) and operates fortnightly to a number of rural settlements
Villages – other comments	<ul style="list-style-type: none"> • Consider rural settlements as inter-related groups that together have the capacity to develop new forms of shared / networked rural services and enterprise (e.g. Hockerton). • Build satellite hamlets around the towns - not joined or big but self supporting and separated by green spaces • Proximity of villages and towns to each other needs to be considered. If there is a larger service village next to a smaller service village, better to grow one rather than both e.g. expand Puckeridge rather than Braughing • Enable smaller villages and hamlets to evolve and enhance and maintain their own sustainability - different to Towns and Larger Service Villages, which meet the general needs of the district (i.e. PPS3) • Amount of development distributed to each village must be based on an assessment of the services and facilities available, and their potential for acting as a local service centre for their rural catchment • Villages are not comparable and there is a huge difference in their ability to offer a sustainable form of development. Whilst national planning policy highlights the need to improve the sustainability of rural settlements, such development should be directed to locations where it can build on existing services e.g. larger villages. • Increase villages by 20%+ to save schools, village halls and pubs • Infill and protect village boundaries especially Category 1 • Some of the larger service villages may welcome the improved infrastructure a development could have with the increase of facilities such as new shops, schools and healthcare facilities • Larger and smaller service villages need more facilities (schools, medical centres, shops etc) • Consider new small developments in a range of villages alone • Built in small developments (5-10 properties) spread across the district with each area looked at so as not to negatively impact on countryside, economy, congestion, way of life, current residents • Would it be worth considering the numbers of potential infill sites in the villages and surrounding parishes which could be utilised without detriment to the areas and their amenities with least effect • Must avoid settlements falling into a 'sustainability trap': <ul style="list-style-type: none"> • Smaller Service Villages, Other Villages and Hamlets need a development framework that gives them an opportunity to evolve and become more sustainable • In current economic circumstances cross financing through the sale of market housing is likely to form the key mechanism for delivering this type of development • Policies need to permit the delivery of social, employment, sports or other amenities identified by a community in addition to affordable housing • Large Service Villages should not have their growth limited to that solely provided under the framework outlined above. This would fail to reflect the guidance in PPS3, which indicates at paragraph 38 that Local Service

Q22 - Summary Comment	Q22 - Detailed Comment
	<p>Centres are a sustainable location for development to meet the wider needs of the district in their own right.</p> <ul style="list-style-type: none"> • Can be exceptional circumstances for housing in smaller villages where this meets local affordability requirements • Not necessarily the larger villages that need to expand - often modest organic growth on small sites over a ten year period can assist small village communities whilst also providing affordable housing. Large scale housing in villages may sustain school but without employment, it generates commuting by car • Workable policies for smaller service villages that allow limited development and give priority to local residents to stay in village
Support for development in the rural area	<ul style="list-style-type: none"> • One third of population live in rural area • Necessary to maintain 'life' within small villages (e.g. schools, village stores, post office, public houses, churches) • Towns are in gridlock now yet villages are dying out • All villages have a small group of people who wish to keep the village as a private enclave for their own personal satisfaction with no thought for the future - pubs, shops and schools all closing • By increasing housing in rural area could improve sustainability of rural area i.e. greater vitality for shops and buses and lessen urban growth of the main towns • Development in smaller villages to cater for local need
Opposition to development in rural area	<ul style="list-style-type: none"> • Would blight our villages • Residents want countryside and peace (paid high prices for their properties for this reason) • To preserve rural character • Lack of transport • Development would increase traffic and CO2 • Large building projects in villages and hamlets destroys local character • Developments in smaller villages not very sustainable • Category 1 Villages are already developed and should have no further development
Question 40	<ul style="list-style-type: none"> • It would be helpful to have a definition of what services a Smaller Service Village should have. Does it have a school, church, village hall, pubs but no shop doctor etc? • Designation of a village with a small volunteer run shop, a school and 2 pubs as a Larger Service Village is nonsense
Question 41 - Aston	<ul style="list-style-type: none"> • Current status of Aston (Category 2 in Green Belt) should be retained allowing only minor development that will not change character of village. Recognise some development would be beneficial to encourage broader spectrum of ages within the village • Correctly identified as a smaller service village
Question 41 - Braughing	<ul style="list-style-type: none"> • Keep Braughing as a village
Question 41 - Great Amwell	<ul style="list-style-type: none"> • Great Amwell is very accessible • Whilst development to the northwest of Great Amwell is in the Green Belt it can be tightly constrained by the A10 bypass and would have less impact than development to the south of Ware
Question 41 - Hertford Heath	<ul style="list-style-type: none"> • Should be made into a much larger town/city concentrating infrastructure
Question 41 - Much Hadham	<ul style="list-style-type: none"> • A larger service village fortunate to have a bus service but this is not frequent enough to be used by many of those who work locally who have to travel by car • Interactive LDF sessions suggest 170 homes for Much Hadham by 2031, which assuming 60/70% executive homes with reasonable sized gardens

Q22 - Summary Comment	Q22 - Detailed Comment
	would result in too large a land take and too much greenfield development since only sites discussed so far have difficult access or are too small to make significant development possible
Question 41 - Puckeridge	<ul style="list-style-type: none"> • Development on the north side of Puckeridge should be totally precluded from housing development in order to allow for future route of Standon/Puckeridge bypass as part of strategic east-west A120 route
Question 41 - Stanstead Abbots & St Margarets	<ul style="list-style-type: none"> • Included as a Larger Service Village - not a Main Settlement which would limit amount of development directed to it • Two proposed sites could jointly contribute to the requirement for new homes without impacting on openness of the Green Belt or the character of the two villages • Also close to regional centre of Harlow in an area of land availability • Downgraded but not on the basis of sustainability - arguably more preferable than Buntingford • Comparable to Buntingford in terms of employment but also has a railway station and is better connected to larger settlements - far greater opportunities for achieving a truly sustainable development that does not rely on private car. This must be resolved in next iteration • Stanstead Abbots has limited public transport options and is difficult to travel to Stevenage, Welwyn Garden City and Watford • Stanstead Abbots becoming a dormitory village, adversely impacting its character <hr/> <ul style="list-style-type: none"> • Strong objection to the proposed de-classification of Stanstead Abbots and St Margarets as a main settlement - more facilities than other larger service villages and better located to other nearby towns - capable of accommodating a sustainable urban extension (e.g. Kitten Hill) • If Stanstead Abbots to remain as a service village, growth must be apportioned between each settlement on the basis of range of facilities, accessibility, land availability rather than on a proportional basis
Question 41 - Walkern	<ul style="list-style-type: none"> • Already a busy village
Question 41 - Watton-at-Stone	<ul style="list-style-type: none"> • One of most suitable locations outside of towns • Has a railway station, number of shops including a post office, food shops, general store, butcher, GP surgery, primary school & transport connections • Close to Hertford, Welwyn Garden City and Stevenage

Chapter 10: North of Harlow

Q22 - Summary Comment	Q22 - Detailed Comment
Primary Education	<ul style="list-style-type: none"> • Should provide sufficient capacity to meet its own demand and not impact upon existing village schools
Harlow North - Secondary Education	<ul style="list-style-type: none"> • Should provide sufficient capacity to meet its own demand and not impact upon existing schools in East Herts
North of Harlow - Library	<ul style="list-style-type: none"> • New library (700-750sqm) would be required to serve the new population
Opposition to development north of Harlow	<ul style="list-style-type: none"> • Effectively a new settlement and should be evaluated on this basis as undeliverable • Would use existing infrastructure which is insufficient • Against Green Belt development at Harlow North • Consultation does not allow comment on assumptions • Threatened by expansion of Harlow into Hertfordshire villages • We are in Hertfordshire and not Essex - therefore keep development out of Hertfordshire
Support for development to the north of Harlow	<ul style="list-style-type: none"> • First preference • Standalone preferred option

Q22 - Summary Comment	Q22 - Detailed Comment
Primary Education	<ul style="list-style-type: none"> • Should provide sufficient capacity to meet its own demand and not impact upon existing village schools
	<ul style="list-style-type: none"> • Preferred to overdevelopment of existing settlements due to existing infrastructure capacity problems • Can provide employment, transport and other services alongside housing • Can be objected to on various environmental grounds but these are overridden by it being self-sufficient • Has capacity and level of supporting services and infrastructure required to meet the district's housing, socio-economic and environmental needs to 2031 • Would relieve the development pressure on the constrained historic towns and villages • Help facilitate regeneration of Harlow • Meets East Herts and Harlow's housing needs • If significant development is required in East Herts, Harlow north can accommodate limited development
Approach to north of Harlow in Core Strategy	<ul style="list-style-type: none"> • Absence of Harlow north has an option A-F means its potential to contribute to the Core Strategy objectives and sustainable development is unknown • Separate strategic policy required • Shared vision with Harlow district to maximise opportunities and inter-linkages that a prosperous larger Harlow will have for the wider area • Joint approach advocated by EEDA • East Herts Core Strategy must recognise that the success of its settlements is linked to continued success of Harlow <hr/> <ul style="list-style-type: none"> • EHC Core Strategy should show greater recognition of role and function of Harlow by including growth to north of Harlow in its development strategy

Question 23: Approaches to Housing Distribution

Which housing distribution approach do you think is the most appropriate to meet the challenges facing East Herts and achieve sustainable development? Is there another approach we have not considered?

79 respondents provided comments in relation to Question 23. These included:

- 28 individuals/residents
- 36 Developers/agents/businesses/landowners
- 6 Organisations including:
 - Buntingford Civic Society
 - Epping Forest District Council
 - Stevenage Borough Council
 - The Ware Society
 - Transition Hertford
 - Environment Agency
- 9 Town and Parish Council including:
 - Aston
 - Bishop's Stortford Town
 - Great Munden
 - Hertford Heath
 - Hertford Town
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Thundridge

Q23 - Summary Comment	Q23 - Detailed Comment
Disagree with all approaches	<ul style="list-style-type: none"> • None are suitable • Do not agree with any one approach in isolation • Difficult to take this question seriously • Preferential ranking is not appropriate. Chapter 3 is too overloaded with information and portrays what EHDC has already decided - needs to be reviewed against sustainability criteria • PPS12 and soundness - proposed alternatives need to be reasonable and realistic and not invented for the sake of it. Assist with passage through examination and make it more difficult to challenge • None suitable - can't just apply numbers and hope it will work - needs to be looked at in far more detail • Purely abstract / theoretical / simplistic / restrictive and mechanistic - less crude approach required • Approaches are purely numerical and contrary to national planning policy (i.e. PPS1, PPS3, PPS4) which clearly state that development should be in most sustainable accessible locations not purely based on settlement size
Object: Top-down planning	<ul style="list-style-type: none"> • Example of top-down planning - needs and wished of separate communities should be considered. Only if they do not add up to something workable should EHDC resolve conflict. As such, this may not necessarily produce a pattern of development that conforms to a predetermined template • Not appropriate - take a top down estimate and then attempt to spread it about - need an informed assessment of housing need • Centralised approach - with far greater local consultation, a different approach would be identified
Approach needs to be modified	<ul style="list-style-type: none"> • No one approach - will differ in light of geography and circumstances • Any approach has to be tempered by capacity/constraints of the settlement (assessment of topography, environment, utilities, transport, Green Belt boundaries, character, prospects for local employment, demand for school places) which may override mathematical formulae • Need to take into account ability of infrastructure to cope with additional housing and impact of development in adjacent districts; what density of population increase can infrastructure cope with? • Tempered by desire criteria - ration of people who want to live in rural versus urban locations and high or low density housing. Approach by settlement type VI is closest to this (ranked 2nd)
1st preference	<ul style="list-style-type: none"> • I [proportional] • I & II • I moderated by II and V (and capacity/constraints) • I, IV, V, VI • II, • II & VI • II moderated by V (and capacity/constraints) • III & VI • VI & V - correct broad location then correct site • V [land availability] - minimal effect on current residents
Last preference	<ul style="list-style-type: none"> • III, • III & V, • I & II
Approach I comments	<ul style="list-style-type: none"> • Preserves status quo - appears fair in that it avoids complex issue of need but is arbitrary and contrary to vision • Based on existing size thus concentrating development near existing services and infrastructure • Flawed - fails to consider sustainability attributes of any given settlement - risk that

Q23 - Summary Comment	Q23 - Detailed Comment
	<p>more remote settlements with limited transport connections would be faced with disproportionately high number of homes</p> <ul style="list-style-type: none"> • Support variation of approach I if included east of Stevenage
Approach II comments	<ul style="list-style-type: none"> • arbitrary and contrary to vision • Based on existing size thus concentrating development near existing services and infrastructure • Starting point rather than sole determinant that should reflect sequential approach in which priority is also given to locations which lie outside of Green Belt • Starting point - but distinction needs to be made between larger and smaller villages - some of the larger villages are capable of accommodating a reasonable share of future population not only in terms of facilities and transport accessibility but because of availability
Approach III comments	<ul style="list-style-type: none"> • arbitrary and contrary to vision • Allocates growth where there is insufficient infrastructure and cannot make use of existing infrastructure within larger urban areas • Unrealistic - cannot see value of including this option where most development would be in least sustainable settlements • Lead to even greater infrastructure problems
Approach IV comments	<ul style="list-style-type: none"> • arbitrary and contrary to vision • Unsustainable - allocates equal growth regardless of size and infrastructure • Lead to even greater infrastructure problems
Approach V comments	<ul style="list-style-type: none"> • Not the most laissez-faire - solid basis in reality from which detailed evaluation can begin • Does not seem sensible - allocate land purely based on Call for Sites which is not definitive and may suggest areas that are not suitable • Development just because land is available and owner willing to profit is not an acceptable reason for development • Only approach that relates to Stevenage which is a sustainable location for development. Existing urban areas best equipped to accommodate growth • Most pragmatic and should not be capped by an arbitrary figure designed to constrain development • Lead to even greater infrastructure problems
Approach VI comments	<ul style="list-style-type: none"> • arbitrary and contrary to vision but has some advantage in being related to the model being used for settlement planning in the district • Fairly reasonable as it takes into account existing size and infrastructure • Revised approach distributing housing to Bishop's Stortford, Sawbridgeworth, Ware and Hertford • Similar to VI but instead of equal split, a larger proportion would go to larger settlements and smaller proportion to smaller settlements • Lead to even greater infrastructure problems
Combined approach	<ul style="list-style-type: none"> • Combination of I, II and V would be most realistic although depend on the strategy adopted • Combination of II, V and VI would be most realistic although depend on the strategy adopted
Alternative approaches: principle	<ul style="list-style-type: none"> • Distributed based on local need - not just pro-rata • Design-led approach rather than purely prescriptive; Core Strategy should simply identify specific sites based on sustainable locations and design • Allow local communities and parish councils to decide their own needs/referendum • Distribution should be based on the size of the hinterland that the settlement serves not purely number of homes at each settlement e.g. Buntingford has a large rural hinterland and is outside of Green Belt
Alternative approaches: criteria based	<ul style="list-style-type: none"> • Consider principles by which each settlement may be allocated different levels of development rather than arbitrary amount based on settlement type (remove inconsistencies in approach to settlement identification)

Q23 - Summary Comment	Q23 - Detailed Comment
	<ul style="list-style-type: none"> • All the major settlements have constraints and a needs assessment should be carried out to establish limited housing growth that they can absorb
	<ul style="list-style-type: none"> • fulfil criteria established under themes 1-8 • local need • land availability • capacity of services and infrastructure to expand
	<ul style="list-style-type: none"> • housing need • settlement type (size, range of services, access to public transport) • Land availability
	<ul style="list-style-type: none"> • Growth should help achieve the following: <ul style="list-style-type: none"> • 1. Maximise facilities (shop, church, pub, transport, employment); 2. Clear boundaries to avoid coalescence; 3. Sustainable housing in the right place for local employment
	<ul style="list-style-type: none"> • Reconcile national policy objectives with balance of jobs, homes and infrastructure
Alternative approaches: various	<ul style="list-style-type: none"> • Adjust development by reference to cumulative growth over last 30 years. Thus future growth would be concentrated in those settlements that have grown the least • Local Plan PCBD approach not included - which relegated Buntingford to a second tier development locations • Sequence and timing more important than total numbers • 80% to the towns and 20% to named larger centres and smaller villages • Split between Stevenage/Welwyn conurbations and remainder distributed using one of the options
Distribution in Villages	<ul style="list-style-type: none"> • Consider relationship between rural settlements to ensure that growth is distributed in a way that supports informal social networks assists people living near to place of work and benefit from key services • Rate of development year on year in villages should be constrained in order to retain the evolution of property and the community - single large developments dramatically alter community demographics and destroy rural communities turning them into satellite commuter housing estates with poor transport links • All approaches allocate far too many to villages
Miscellaneous	<ul style="list-style-type: none"> • Build up family life to avoid two houses per family • Collaboration with Welwyn Hatfield Council • Reserves right to comment later

Comments received to Q22 in respect of other issues relating to Chapter 3

Q23 - Summary Comment	Q23 - Detailed Comment
Q22: Development Strategy	<ul style="list-style-type: none"> • Option C preferred based on local need
Housing	<ul style="list-style-type: none"> • Identifying suitable sites particularly important RE PPS3, maintaining 5 year housing land supply • Take Hertfordshire as a whole for housing needs, not just East Herts
Brownfield	<ul style="list-style-type: none"> • Brownfield can be sustainable, but may not be well connected to transport, employment, local services. Greenfield development adjacent to town boundaries can be sustainable. • Old industrial sites are good for housing; support use of brownfield land • Brownfield redevelopment can resolve contamination and improve quality of water environment • Existing urban areas best equipped to accommodate growth
Challenge population growth	<ul style="list-style-type: none"> • Challenge population growth - cannot be infinite; no growth
East of England Plan	<ul style="list-style-type: none"> • Based on revoked East of England Plan which is flawed, based on false assumption inc Stansted Airport growth • Need detailed evidence to underpin consultation in respect of demographics and

Q23 - Summary Comment	Q23 - Detailed Comment
	population (to justify level of housing supply). Future assessment should consider evidence that supported regional plan which was tested and found sound at examination
Settlement Identification	<ul style="list-style-type: none"> • Stanstead Abbots & St Margarets is more sustainable than Buntingford (congested roads, no railway); is a current Main Settlement no justification for not continuing this approach • Stanstead Abbots & St Margarets and Watton-at-Stone should not be in same category as smaller villages like High Cross; they are second tier settlements • Stanstead Abbots & St Margarets should be classified as a main settlement • Buntingford categorised as a Larger Service Village
Towns / Larger areas	<ul style="list-style-type: none"> • Need to evaluate whether continuing to favour the towns (that have grown rapidly in recent years) is the best way forward? • Larger settlements typically offer best opportunities for sustainable development but must combine with land availability. • Look at areas with larger infrastructure e.g. railway, more than one school, doctor's, hospitals more than one bank, major shops
Bishop's Stortford	<ul style="list-style-type: none"> • Bishop's Stortford has taken a disproportionate share of the housing burden in recent years - mass development cannot be tolerated - burden must be shared across the district • Bishop's Stortford neither needs nor can support further 4,000 dwellings
Sawbridgeworth	<ul style="list-style-type: none"> • Land available in Sawbridgeworth
Ware	<ul style="list-style-type: none"> • Growth located near to Great Amwell given proximity to Ware, public transport and walking distance
Other locations	<ul style="list-style-type: none"> • Land at Birchall Lane - Advantages of scale - flexible site that can be brought forward to accommodate different scales of growth. Larger scale can provide greater benefits in terms of sustainability • East of Stevenage existing sustainable location for growth - existing urban areas best equipped to accommodate growth • developing outside Rye Meads catchment area • Prevent destruction of countryside - restrict to near M25 and M11, only brownfield sites