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Jeff Hughes

*Head of Democratic and Legal
Support Services*

MEETING : LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE
PANEL
VENUE : COUNCIL CHAMBER, WALLFIELDS, HERTFORD
DATE : THURSDAY 7 JULY 2011
TIME : 7.30 PM

PLEASE NOTE START TIME

MEMBERS OF THE PANEL

Councillors M Carver (Chairman) and L Haysey

All other Members are invited to attend and participate if they so wish.

CONTACT OFFICER: Linda Bevan

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PERSONAL AND PREJUDICIAL INTERESTS

1. A Member with a personal interest in any business of the Council who attends a meeting of the Authority at which the business is considered must, with certain specified exemptions (see section 5 below), disclose to that meeting the existence and nature of that interest prior to the commencement of it being considered or when the interest becomes apparent.
2. Members should decide whether or not they have a personal interest in any matter under discussion at a meeting. If a Member decides they have a personal interest then they must also consider whether that personal interest is also prejudicial.
3. A personal interest is either an interest, as prescribed, that you must register under relevant regulations or it is an interest that is not registrable but where the well-being or financial position of you, members of your family, or people with whom you have a close association, is likely to be affected by the business of the Council more than it would affect the majority of inhabitants of the ward(s) affected by the decision.
4. Members with personal interests, having declared the nature of that personal interest, can remain in the meeting, speak and vote on the matter unless the personal interest is also a prejudicial interest.
5. An exemption to declaring a personal interest applies when the interest arises solely from a Member's membership of or position of general control or management on:
 - any other body to which they have been appointed or nominated by the authority
 - any other body exercising functions of a public nature (e.g another local authority)

In these exceptional cases, provided a Member does not have a prejudicial interest, they only need to declare their interest if they speak. If a Member does not want to speak to the meeting, they may still vote on the matter without making a declaration.

6. A personal interest will also be a prejudicial interest in a matter if all of the following conditions are met:
 - the matter does not fall within one of the exempt categories of decisions
 - the matter affects your financial interests or relates to a licensing or regulatory matter
 - a member of the public, who knows the relevant facts, would reasonably think your personal interest is so significant that it is likely to prejudice your judgement of the public interest.
7. Exempt categories of decisions are:
 - setting council tax
 - any ceremonial honour given to Members
 - an allowance, payment or indemnity for Members
 - statutory sick pay
 - school meals or school transport and travelling expenses: if you are a parent or guardian of a child in full-time education or you are a parent governor, unless it relates particularly to the school your child attends
 - housing; if you hold a tenancy or lease with the Council, as long as the matter does not relate to your particular tenancy or lease.
8. If you have a prejudicial interest in a matter being discussed at a meeting, you must declare that interest and its nature as soon as the interest becomes apparent to you.
9. If you have declared a personal and prejudicial interest, you must leave the room, unless members of the public are allowed to make representations, give evidence or answer questions about the matter, by statutory right or otherwise. If that is the case, you can also attend the meeting for that purpose. However, you must immediately leave the room once you have finished or when the meeting decides that you have finished (if that is earlier). You cannot remain in the public gallery to observe proceedings.

AGENDA

1. Apologies

To receive apologies for absence

2. Declarations of Interests

To receive any Member(s)' Declaration(s) of Interest

3. Chairman's Announcements

4. Minutes (Pages 7 - 12)

To approve the Minutes of the meeting of the Panel held on 23 September 2010 (circulated with Executive agenda for 12 October 2010)

5. East Herts Local Development Framework: Localism and Neighbourhood Planning (Pages 13 - 26)

6. LDF Core Strategy: Responses to Issues and Options Public Consultation 2 September 2010 to 25 November 2011 (Pages 27 - 346)

7. East Herts Core Strategy Preferred Options: Project Plan and Methodology Statement (Pages 347 - 382)

8. New Home Bonus and Community Infrastructure Levy (CIL) (Pages 383 - 404)

9. LDF: Strategic Land Availability Assessment (SLAA) Project Plan and Establishment of SLAA Partnership (Pages 405 - 462)

10. LDF: Call for Sites Update Report (Pages 463 - 490)

11. East Herts Green Infrastructure Plan (March 2011) and Hertfordshire Strategic Green Infrastructure Plan (March 2011) (Pages 491 - 642)

12. Assessment of East Herts Sports Facilities (May 2011) (Pages 643 - 660)

13. LDF: Morphology and Place Shaping (MAPS) Technical Study (Pages 661 - 694)

14. Urgent Business

To consider such other business as, in the opinion of the Chairman of the meeting, is of sufficient urgency to warrant consideration and is not likely to involve the disclosure of exempt information.

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MINUTES OF A MEETING OF THE
LOCAL DEVELOPMENT FRAMEWORK
EXECUTIVE PANEL HELD IN THE
COUNCIL CHAMBER, WALLFIELDS,
HERTFORD ON THURSDAY 23
SEPTEMBER 2010, AT 7.00 PM

PRESENT: Councillor M G Carver (Chairman)
Councillors R L Parker

ALSO PRESENT:

Councillors Mrs M H Goldspink and
J P Warren

OFFICERS IN ATTENDANCE:

Linda Bevan	- Committee Secretary
John Careford	- Senior Planning Officer
Martin Paine	- Senior Planning Officer
Jenny Pierce	- Senior Planning Officer
Claire Sime	- Team Leader Planning Policy
Kevin Steptoe	- Head of Planning and Building Control
Bryan Thomsett	- Planning Policy Manager

**8 STRATEGIC HOUSING MARKET ASSESSMENT -
VIABILITY ASSESSMENT FOR LONDON COMMUTER
BELT (EAST)/M11 SUB REGION - FINAL REPORT
(AUGUST 2010)**

**The Executive Members for Planning Policy and
Transport and Housing and Health submitted a joint
report on the final Strategic Housing Market Assessment**

(SHMA) Viability Assessment undertaken on behalf of the London Commuter Belt (East/M11) Sub-region by consultants.

The SHMA assessed current and future housing demand and need and how distribution of this varied across the plan area. It would inform decisions relating to the provision of affordable housing. Further technical work had been undertaken to assess the viability of the SHMA recommendations with the help of Government funding. This would set the framework for detailed testing of specific sites, as part of the Council's housing trajectory and Strategic Housing Land Availability Assessment (SHLAA). This would also help to ensure that the policies in the Council's Local Development Framework (LDF) were as robust as possible and worked to maximise the deliverability of all housing including affordable housing.

The methodology of the viability assessment was explained in the report. It was based on a residual land value model which was recognised practice in the development industry. The SHMA recommended affordable housing requirements and these had been tested as part of the assessment using various tenure mixes.

Members commented on the complexity of the system and the difficulty of explaining it to the public. Officers emphasised that the work was essential to back up policies in the LDF. Results would need to be monitored which would use significant resources. Training would be needed for Officers and Members on the system.

The Panel decided to recommend to the Executive that the assessment be agreed as now detailed.

RECOMMENDED - that the Strategic Housing Market Assessment – Viability Assessment for London Commuter Belt (East)/M11 Sub Region – (August 2010) be agreed and published as a technical study, forming part of the evidence base

to inform and support the Local Development Framework (LDF), and for planning policy and housing strategy purposes.

**9 EAST HERTS PLAYING PITCH STRATEGY AND
OUTDOOR SPORTS ASSESSMENT (JULY 2010)**

The Executive Member for Planning Policy and Transport submitted a report on the Playing Pitch Strategy and Outdoor Sports Assessment. Agreement was sought to use the strategy and assessment as a technical document to support the evidence base of the LDF.

A presentation was given on the strategy and assessment and an executive summary was circulated at the meeting.

It was explained that the assessment contained the national and local context for sports, methodology of the assessment, and quantity and quality of outdoor sports areas and education provision. Facilities were needed for junior football in particular.

The strategy set out a series of strategies for dealing with the issues raised in the assessment and contained a series of action plans.

Members commented on the need for better outdoor facilities coordinated with indoor facilities and the use of East Herts facilities by people from outside the District.

The Panel decided to recommend to the Executive that the strategy and assessment be agreed as now detailed.

RECOMMENDED – that the East Herts Playing Pitch Strategy and Outdoor Sports Assessment – July 2010 be agreed and published:

(A) as a technical study, forming part of the evidence base, to inform and support the East Herts Local Development Framework;

(B) as a basis for informing future Development Control decisions concerning development which affects playing pitches and outdoor sports facilities; and

(C) as a basis for informing the Sports and Active Recreation Facilities Strategy (part of the Facilities Improvement Scheme) and any Action Plans contained therein.

10 HERTFORDSHIRE RENEWABLE AND LOW CARBON ENERGY TECHNICAL STUDY (JULY 2010)

The Executive Member for Planning Policy and Transport submitted a report on the completion of the Hertfordshire renewable and low carbon energy technical study. The study provided a technical evidence base in respect of CO₂ emissions and energy provisions which would assist in the formulation of climate change policies in the LDF Core Strategy.

The study had been produced by consultants for ten authorities in Hertfordshire. The first stage of the study (which had been reported to the Panel previously) had revealed issues which needed to be addressed in the second stage. Further recommendations were emerging from the first stage and were under discussion by Officers.

The revocation of the East of England Plan had left a policy vacuum in respect of energy and climate change. The study would provide a basis for a replacement local policy in the LDF. The role of planning was to identify energy and climatic opportunities and set out policies designed to support action and delivery.

The study explained that local policy would be needed in gearing the housing industry and supply chain to meet the zero carbon homes policy. It examined more efficient ways of generating and delivering heat and gave theoretical figures for opportunities for renewable and

low carbon technologies.

The Chairman commented on the huge challenge presented by this area of planning policy.

The Panel decided to recommend to the Executive that the study be agreed as now detailed.

RECOMMENDED - that the Hertfordshire Renewable and Low Carbon Energy Technical Study (July 2010) be agreed and published as a technical study, forming part of the evidence base, to inform and support the East Herts Local Development Framework.

11 LOCAL DEVELOPMENT FRAMEWORK EVIDENCE BASE - TECHNICAL STUDIES 2009/10 AND 2010/11

The Executive Member for Planning Policy and Transport submitted a report updating the Panel on evidence base related studies for 2009/10 and seeking agreement to those for 2010/11.

It was reported that one of the key aims of the planning system was that documents should be founded on a robust and credible evidence base. This should be based on background or technical studies/assessments which could be used to inform and justify planning policies. Details of the Council's studies were given. The Panel was also asked to give authority to the Head of Planning and Building Control, in consultation with the Executive Member for Planning Policy and Transport, to approve any other relevant studies deemed appropriate within the limits of the 2010/11 Planning Policy/LDF budgets.

The Chairman commented on the good progress made on these studies.

The Panel decided to recommend to the Executive that the studies be agreed as detailed below.

RECOMMENDED – that (A) it be noted that the technical studies listed in Essential Reference Paper ‘B’ to the report now submitted, which are due for completion, already underway or proposed to be undertaken during 2010/11, contribute to the Local Development Framework Evidence Base;

(B) the technical studies referred in (A) above be completed or undertaken by means of:

- (i) seeking competitive quotes or tenders, as appropriate, to engage consultants, with the costs being met from the 2010/11 Planning Policy/Local Development Framework budgets for such purposes; and/or
- (ii) partnership working where appropriate, with neighbouring authorities and other relevant partners; and

(C) the Head of Planning and Building Control, in consultation with the Executive Member for Planning Policy and Transport, be given authority to approve funding, within the limits of the 2010/11 Planning Policy/Local Development Framework budgets, for such other relevant planning policy studies, as may be deemed appropriate.

12 MINUTES

RESOLVED – that the Minutes of the Panel meeting held on 27 May 2010 be approved as a correct record and signed by the Chairman.

The meeting closed at 8.10 pm

Chairman

Date

EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL – 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

EAST HERTS LOCAL DEVELOPMENT FRAMEWORK: LOCALISM AND NEIGHBOURHOOD PLANNING

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- To provide Members with an initial briefing on the key elements of the Localism Bill and its likely implications for planning policy in East Herts.

<u>RECOMMENDATION FOR EXECUTIVE:</u> to commend to Council that:	
(A)	priority be given to progressing the Local Development Framework (LDF) as quickly as possible in order to provide an effective strategic planning policy framework for the new tier of neighbourhood planning; and
(B)	communities wait, before they do any substantive work on neighbourhood plans, until the Localism Bill has received Royal Assent later this year, so that there is more certainty about the neighbourhood planning process and the Council is in a better position to support and advise

1.0 Background

- 1.1 The Localism Bill was presented to Parliament on 13 December 2010. The Bill is currently being debated and is not expected to receive Royal Assent until late in 2011, with enactment in Spring 2012.
- 1.2 The Bill will devolve greater powers to Councils and neighbourhoods and give local communities more control over housing and planning decisions.

1.3 On 8 March 2011 the Executive considered a report on the Localism Bill, entitled 'Localism Bill – East Herts Council Leading the Way'. The report provided a brief overview of the key proposals contained in the Localism Bill and highlighted how the Council is already responding to some of the proposed changes.

2.0 Report

2.1 This report specifically considers the likely implications of the Localism Bill on planning policy in East Herts.

2.2 In summary, the planning and regeneration provisions of the Bill will:

1. Abolish Regional Spatial Strategies.
2. Streamline national planning policy guidance through the introduction of a new National Planning Policy Framework (NPPF).
3. Provide for neighbourhood plans, which would be approved if they receive support from more than 50% of the votes cast in a referendum.
4. Provide for Neighbourhood Development Orders and Community Right to Build Orders to allow communities to approve development without requiring normal planning consent.
5. Amend the Community Infrastructure Levy, which allows Councils to charge developers to pay for infrastructure; some of the revenue will be available for the local community.
6. Require prospective developers to consult local communities before submitting planning applications for large developments.
7. Abolish the Infrastructure Planning Commission and return to a position where the Secretary of State takes the final decision on major infrastructure proposals of national importance.

This report considers items 1-5 above.

2.3 In addition to the above provisions, the Budget 2011 saw the launch of the Government's 'Plan for Growth' (HM Treasury, March 2011) which includes:

- A new presumption in favour of sustainable development, so that the default answer to development is 'yes';
- The introduction of new powers so that businesses are able to bring forward neighbourhood plans and neighbourhood development orders; and

- 21 new Enterprise Zones, to focus growth in specific parts of the UK.

Revocation of Regional Spatial Strategies (RSS)

- 2.4 The Localism Bill will remove the primary legislation which sets the basis for Regional Spatial Strategies, including the East of England Plan.
- 2.5 Regional Spatial Strategies were first revoked by the Government on 6 July 2010 but were subsequently re-established on 10 November 2010 after a successful challenge by housebuilder CALA homes. Following this, the Government advised that it is for local planning authorities to decide what weight to give to the intention to abolish regional strategies. However, a more recent decision in the High Court (May 2011) has confirmed that the Government's intention to revoke regional strategies may only be worthy of being given weight in very few cases in which the proposed abolition of regional strategies will be relevant. Moreover, the intention to abolish should not be a factor in the plan-making process. Thus, in terms of the East Herts Local Development Framework (LDF), the provisions of the East of England Plan remain in place until the Localism Bill is enacted and a Strategic Environmental Assessment (SEA) of its revocation is completed.

National Planning Policy Framework (NPPF)

- 2.6 The Government has made it clear that, with the exception of nationally important projects, planning should be a local matter. The role of central Government is to determine and define environmental, economic and social priorities for the country and design a planning system which helps ensure a pattern of development that matches these priorities and local aspiration. This role is currently fulfilled through legislation, and through the suite of planning policy guidance notes (PPG's) and minerals policy guidance notes (MPG's), and more recently planning policy statements (PPS's) and minerals policy statements (MPS's).
- 2.7 These documents, which run to over 1,000 pages, currently set out central Government policy on various aspects of development and land use, and local planning authorities must have regard to them when drawing up their LDF's. They are also often relevant to making decisions on planning applications. They cover broad policy themes such as climate change, housing, renewable

energy, flood risk and green belt, and also procedural matters such as how to compile local development plans.

- 2.8 The Government believes, however, that the current suite of planning policy statements and guidance notes is too centralist in its approach, and too long and cumbersome for Councils and developers to use effectively. Therefore, the Government proposes to produce a simple national planning policy framework setting out their priorities for the planning system in England in a single, concise document covering all major forms of development proposals handled by local authorities. All the national planning policies set out in PPG's, MPG's, PPS's and MPS's will be integrated into a single document.
- 2.9 It is anticipated that the National Planning Policy Framework will set broad economic, environmental and social priorities and how they relate to each other, but will ensure that the majority of planning decisions are made at the local level. The framework will also set out a basis for economic growth, a presumption in favour of sustainable development, as well as any further policy needed to establish and implement neighbourhood plans.

Neighbourhood Planning

- 2.10 A key component of the Bill introduces a new tier of spatial planning - namely neighbourhood planning. The Government anticipates that neighbourhood planning will allow people to come together either through a Parish Council or neighbourhood forum and say where they think new houses, businesses and shops should go, and what they should look like.
- 2.11 A neighbourhood plan should be established within the context of a local planning authority's LDF and within the parameters defined in national planning policy. It is anticipated that a neighbourhood plan will comprise a policy element and a development order element.
- 2.12 Policies within a neighbourhood plan could cover:
- Planning objectives for the neighbourhood
 - The broad planning context (e.g. transport connections), local facilities and services
 - Key neighbourhood projects and infrastructure priorities
 - Development management policies
 - Site specific policies

- 2.13 A neighbourhood development order would directly grant planning permission for certain specified kinds of developments within the neighbourhood area. Permission could be full or outline, and could have conditions attached. It could be site specific or an order that could grant more generalised development rights across the neighbourhood area.
- 2.14 One of the Government's principle objectives for neighbourhood planning is to increase the rate of growth of housing and economic growth in England. Coupled with a system of financial incentives (see below), it is anticipated that neighbourhood planning will achieve this by enabling communities to be more involved in the design and location of development that takes place in their area.
- 2.15 However, in order to guarantee that neighbourhood planning will not lead to a lower rate of growth, a neighbourhood plan will only be able to advocate an equal or greater quantity of growth in housing or economic development than is established in the LDF.
- 2.16 The Localism Bill will therefore require that neighbourhood plans are in 'general conformity' with the strategic elements of the LDF. The strategic elements will in due course be defined through the new national planning policy framework (see above) and it is anticipated that the definition will include the scale (and broad location) of housing and economic development growth within the development plan area.
- 2.17 A neighbourhood plan can set out the nature of the development that is anticipated and, where a development proposal is shown to be in conformity with that neighbourhood development order, planning permission is automatically granted without the need for a planning application.

Duties on Local Authorities

- 2.18 There will be new duties on local authorities to:
- Confirm the status of a proposed neighbourhood forum
 - Confirm the geographical area of the proposed neighbourhood plan
 - Provide expertise and advice to neighbourhood forums or parish councils
 - Hold referendums

- Adopt neighbourhood plans where all requirements have been met

- 2.19 In East Herts neighbourhood plans and neighbourhood development orders will be undertaken by Town/Parish Councils. It is only in areas without parishes that neighbourhood forums would need to be established. More recently, following the Budget 2011 the Government has also stated in its 'Plan for Growth' that it will enable businesses to bring forward neighbourhood plans and neighbourhood development orders.
- 2.20 Where the promoters of a neighbourhood plan are able to demonstrate that they have adequate local support for the proposed plan, the local planning authority will have a duty to provide advice or assistance on, for example, good practice in plan making and conformity with national and local policy. They will also have a duty to provide practical support, such as helping with community engagement.
- 2.21 The Government estimates that an average neighbourhood plan will cost between £17,000 and £63,000. However, there will be no duty on the local planning authority to provide financial assistance (but it may do so if it chooses). Costs will therefore have to be met by the promoters of the neighbourhood plan. Developers will also be required to pay a fee upon completion of a development given permission under a development order, and in the initial years there will be some initial financial support from central Government.

Scope of a Neighbourhood Plan

- 2.22 Certain categories of development are more appropriately planned at a higher spatial scale than a neighbourhood and would therefore be excluded from a neighbourhood plan. These could include, for example:
- Large scale housing and economic development
 - Nationally significant infrastructure projects

Independent Examination

- 2.23 There will be a 'light touch' examination of the plan, undertaken by a 'qualified person'. Where the examination shows that the plan is not consistent with the strategic elements of the LDF, legal requirements or national policy, then the local planning authority

will not be obliged to carry out a referendum to adopt the plan. The plan would therefore not have any statutory status.

- 2.24 Where the examination shows that the plan is in conformity, the local authority will be legally required to hold a referendum. Where the plan receives the support of more than 50% of voters at the referendum, the local authority will be required to adopt the plan and bring it into effect. It is anticipated that the costs of running a local referendum will be £7,000.

Community Right to Build

- 2.25 As part of neighbourhood planning, the Bill will also give groups of local people the ability to bring forward developments where the benefit of development will be retained by the community, through a streamlined neighbourhood planning process (a Community Right to Build Order). This will be a special kind of neighbourhood development order and will be subject to similar (although less rigorous) requirements as a neighbourhood development order in respect of legal and policy provisions, independent examination and referendum. Referendum costs are expected to be split 50:50 between the community group and the local authority (i.e. £7,000 split 50:50).
- 2.26 Community groups could use this to bring forward small scale developments that have local backing, even where the local authority is opposed. Community Right to Build will apply in all areas, urban and rural, but is most likely to be relevant to rural areas, where for example communities seek additional affordable housing or shops/facilities to support rural life. Schemes eligible to use the streamlined neighbourhood planning process will be limited in size and should not be able to exceed 10% of existing development over a ten year period.

Financial Incentives - New Homes Bonus and Community Infrastructure Levy

- 2.27 As currently envisaged, the incentives package includes the following elements, which will be received by the local planning authority:
- New Homes Bonus (where the Government will match the council tax raised from new homes for the first six years after that home is built with an additional amount for affordable

homes. The bonus will also apply to any empty properties brought back into use).

- Community Infrastructure Levy (which will be levied on all development comprising over 100 square metres gross internal floorspace or involving the creation of additional dwellings even when that is below 100 square metres).

2.28 The Bill introduces three changes to the Community Infrastructure Levy. Firstly, the Bill includes provisions to make regulations requiring some of these funds to be passed to neighbourhoods where the development has taken place. Secondly, it makes clear that funds can be spent on the ongoing costs of infrastructure, as well as the initial costs of new infrastructure. Lastly, it gives local authorities greater control over setting their charging levels, through a local 'charging schedule'.

2.29 Further detail on the New Homes Bonus and Community Infrastructure Levy can be found under **Agenda Item 8**.

What should East Herts Council be doing?

2.30 Whilst there has been much debate about neighbourhood planning, it is not yet entirely clear how this will work in practice. The Government is currently undertaking further work to test some of the key principles, outcomes, costs and processes of the proposed neighbourhood planning reforms, and this in turn may refine how neighbourhood plans are expected to be done.

2.31 What we do know, however, is that neighbourhood planning will be additional to – and not a replacement for – the existing planning system. Greg Clark, Minister for Decentralisation, in a recent interview has made it clear that:

"The primacy of the local plan [LDF] is absolute, which itself has to conform with national policy. Any plan drawn up by a group of local people that didn't conform to the strategic aspects of the local plan would have no standing in the planning system at all."

Planning Magazine, 11 February 2011, page 20

2.32 In fact the Minister has gone so far to say that the new arrangements would reinforce the importance of existing LDF's:

"Throughout all the proposed changes, the importance of high-quality, well-designed local plans [LDF's] is a constant. If anything, they will matter more."

“They will set the wider context for neighbourhood plans. It is important for people to have the opportunity to express their ambitions for their very local area, but it's also important that those ambitions are consistent with the needs and ambitions of the residents of the wider area.

“So those authorities who have complete or well-developed plans should continue to use them, and those who do not should look to make swift progress as a matter of urgency.”

Planning Portal, 27 January 2011

- 2.33 More recently the Government, in its ‘Plan for Growth’, has reiterated the importance of having an up-to-date Core Strategy.
- 2.34 What is very clear then is that the Council should progress with its Core Strategy as quickly as possible, so as to provide an effective strategic planning policy framework for neighbourhood planning. The current anticipated timetable for production of the Core Strategy is:
- Preferred Options Preparation – Summer/Autumn/Winter 2011
 - Preferred Options Consultation – Spring 2012
 - Submission Preparation – Summer 2012
 - Submission Participation – Autumn 2012
 - Independent Examination – Winter 2012
 - Adoption – Spring 2013
- 2.35 This is not to say that communities should not start thinking about whether or not they want to do a neighbourhood plan. Rather the next few months should be seen as an opportunity, giving communities time to consider what they might want to do. It is however, not recommended that communities do any substantive work before the Localism Bill receives the Royal Assent later this year. By this time the new National Planning Policy Framework should have been published, including further policy needed to establish and implement neighbourhood plans, and the Council will have progressed further with its Core Strategy, which is necessary to provide a context for any neighbourhood plan produced.

Conclusion

- 2.36 Whilst the devolution of power to communities through neighbourhood planning may be positive, it is by no means clear

that the Localism Bill as currently drafted will achieve this aim. Detail is lacking both on how either local authorities or local communities can practically respond to the Bill.

- 2.37 Clarity is also needed to enable the general public to manage their expectations of what the Bill means in practice. Without clarification there could be a clear unintended consequence that communities feel less engaged and empowered through the creation of a system that does not work effectively.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

Decentralisation and the Localism Bill: an essential guide (DCLG December 2010)

<http://www.communities.gov.uk/publications/localgovernment/decentralisationguide>

A plain English guide to the Localism Bill (DCLG January 2011)

<http://www.communities.gov.uk/publications/localgovernment/localismplainenglishguide>

Localism Bill: neighbourhood plans and community right to build: impact assessment (DCLG January 2011)

<http://www.communities.gov.uk/publications/localgovernment/localismneighbourhoodplans>

Localism Bill – East Herts Council Leading the Way, Report by Leader of the Council, 8 March 2011

<http://e-services.eastherts.gov.uk/moderngov/mgConvert2PDF.aspx?ID=5262>

Plan for Growth (HM Treasury March 2011)

http://cdn.hm-treasury.gov.uk/2011budget_growth.pdf

Contact Member: Councillor M G Carver, Executive Member for Planning Policy and Economic Development

Contact Officer: Kevin Steptoe, Head of Planning and Building Control – Ext 1407

Report Author: Claire Sime – Team Leader Planning Policy

ESSENTIAL REFERENCE PAPER 'A'

<p>Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):</p>	<p>Promoting prosperity and well-being; providing access and opportunities <i>Enhance the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable.</i></p> <p>Pride in East Herts <i>Improve standards of the built neighbourhood and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
<p>Consultation:</p>	<p>Internal consultation has taken place with the Executive Member for Planning Policy and Transport; Director of Neighbourhood Services; Director of Customer and Community Services; Head of Planning and Building Control; and the Council's Planning Policy Team.</p>
<p>Legal:</p>	<p>It remains a statutory duty under the Planning and Compulsory Purchase Act 2004 that the Council produces and keeps up to date a sound and robust Development Plan for the District.</p>
<p>Financial:</p>	<p>Implementing the Localism Bill will be potentially resource intensive, in financial and staffing terms for the Council, as well as for town/parish councils.</p> <p>It is anticipated that the Council will be responsible for 50% of costs associated with a referendum on Community Right to Build Order (estimated to be £3,500 per referendum). It is not clear whether or not the Council will be responsible for costs associated with a referendum on a Neighbourhood Plan/Order (estimated to be £7,000 per referendum).</p>

	Whilst there will be no duty on the Council to provide financial assistance to those communities that wish to do a Neighbourhood Plan, it may do so if it chooses.
Human Resource:	The impact of the Localism Bill will be managed using existing Planning Policy Team staff resources.
Risk Management:	<p>It is a statutory requirement for the Council to prepare and keep up-to-date its Development Plan.</p> <p>Clarity is also needed to enable the general public to manage their expectations of what the Localism Bill means in practice. Without resolution there could be a clear unintended consequence that communities feel less engaged and empowered through the creation of a system that does not work effectively.</p>

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EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL – 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY - RESPONSES TO ISSUES AND OPTIONS PUBLIC CONSULTATION 2 SEPTEMBER 2010 TO 25 NOVEMBER 2010

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents for consideration a summary of the issues raised, and an analysis of the responses received, to the Local Development Framework Core Strategy Issues and Options consultation. It also sets out the need for further technical work to inform the East Herts housing requirement.

<u>RECOMMENDATION TO EXECUTIVE:</u> to commend to Council that:	
(A)	Members note the issues raised from the Core Strategy Issues and Options consultation;
(B)	the responses received and issues raised are used to inform the preparation of the next stage of the East Herts Core Strategy called Preferred Options; and,
(C)	Members note the ongoing and further technical work being undertaken to inform the East Herts housing requirement.

1.0 Background

- 1.1 The Core Strategy is the first Development Plan Document (DPD) East Herts Council is producing as part of its Local Development Framework (LDF); the series of spatial planning documents that

will replace the East Herts Local Plan Second Review 2007 (Saved Policies), and shape the future of East Herts to 2031.

- 1.2 The Core Strategy is perhaps the most important DPD as it is the overarching and strategic planning document for East Herts, identifying the District wide housing target, broad locations of growth and principles of development. It should be noted, however, that the Core Strategy will not deal with specific sites, other than those sites deemed to be of a strategic nature and central to the delivery of the Core Strategy itself. Instead it will identify broad locations for development to 2031. Importantly, the Core Strategy will establish the strategic planning context for subsequent LDF documents, such as the Site Allocations and Development Management DPDs, as well as any Neighbourhood Plans, prepared by parish councils.
- 1.3 There are a number of stages to the preparation of the Core Strategy involving various rounds of public consultation. The Issues and Options consultation is the first formal stage of consultation and followed community and stakeholder engagement in 2008 and 2009, which informed the content of the Issues and Options document. The next stage of preparation and public consultation is called the Preferred Options and is currently anticipated for spring 2012. Further information on the preparation of the Preferred Options is set out in the Preferred Options Project Plan and Methodology Statement, attached at **Agenda Item 7**.
- 1.4 The purpose of the Issues and Options consultation was simply to set out the issues facing East Herts and to present a series of options for dealing with those issues. Twelve weeks public consultation was held between 2 September and 25 November 2010 and a Summary of the Consultation Event is attached as **Essential Reference Paper B**; suffice to say that it was the most extensive public consultation carried out by East Herts Council on a planning policy document. Town and Parish Councils were sent copies of all of the consultation documents.
- 1.5 The consultation itself was structured around 43 questions, although a Summary Leaflet setting out the main issues and four of the questions was also produced and this was circulated to households alongside the autumn 2010 edition of the Council's LINK Magazine. The Summary Leaflet was also distributed to some businesses across the district.
- 1.6 For the first time, responses could also be submitted online. One

of the benefits of the online consultation portal is that once comments have been processed by Officers, they are available to view publicly online. For this reason, it is not considered necessary to include actual responses to the consultation in this report. Should Members wish to view the responses they can do so via the online consultation portal at <http://consult.eastherts.gov.uk/portal> and select the “who said what” icon. This report, therefore, simply summarises the main issues raised and analyses the responses received.

- 1.7 Acknowledgement should be given to all those unnamed individuals across East Herts who proactively encouraged fellow residents to participate and engage in the Issues and Options consultation.
- 1.8 In respect of campaigns, two local groups were particularly active. The Bishop’s Stortford Civic Federation encouraged residents to submit standard responses whilst the Stop Harlow North (SHN) campaign encouraged its supporters to submit standard letters, postcards and coupons. It should also be noted that the developer with an interest in land to the north of Harlow (Harlow North Joint Venture (HNJV)) sent leaflets to households across East Herts promoting the benefits of development to the north of Harlow to meet all of East Herts needs. For information, copies of the HNJV and SHN leaflets are attached as **Essential Reference Papers C and D**, respectively.
- 2.0 Report
 - 2.1 **Statistical Analysis**
 - 2.1.1 This report presents for consideration a summary of the issues raised to the Core Strategy Issues and Options consultation. A total of 3,398 individuals and organisations responded to the consultation, including 2,279 through the Stop Harlow North Campaign. Notwithstanding this, as can be seen from Figure 1 (below), the engagement of 1,119 individuals and organisations to an initial LDF consultation is still significant and compares favourably with neighbouring local authorities.
 - 2.1.2 A statistical analysis of the consultation responses is attached as **Essential Reference Paper E**. As with all statistics, they must be read with caution as there is a danger that they can be taken out of context. Whilst they assist with interpreting the responses they do not provide the definitive answer. Thus, the

statistics are attached for information only and no discussion or further analysis is given. The statistical analysis:

- Presents aggregate numbers only: they do not reveal whether the planning arguments for or against a particular option are strong or weak;
- Is based on the options selected by respondents; therefore if the options selected by respondents contradict their written comments, these contradictions are not revealed by the statistics;
- Should also be considered alongside the comments set out in this report.

Figure 1: Neighbouring Authorities LDF Consultations

Local Authority	Consultation	Number of people/ organisations responding
Stevenage BC	Key Issues and Alternative Options	78
	Preferred Options	61
Hertsmere BC	Issues and Options	200
	Preferred Options	100
	Submission Draft	45
Broxbourne BC	Core Strategy Key Issues	65
	Core Strategy Preferred Options	565
Harlow DC	Issues and Options consultation	(Due July 11)
Uttlesford DC	Policy Choices and Options for Growth	200
	Preferred Options	1671
	Further consultation on Preferred Options	2388
Welwyn Hatfield BC	Core Strategy Issues and Options	1500 (inc standard reps)

2.1.3 Furthermore, some of the responses to particular questions or from particular settlements are quite small, and it therefore remains open to question as to what level of statistical significance should be attached to them. They are however presented for transparency and completeness. The presentation of the data has also entailed professional judgement with charts being selected based on both the potential meaningfulness of the information and clarity of presentation.

2.1.4 The analysis makes no attempt to attach significance to particular numbers. However, the numbers may attain significance when viewed alongside the range of information which will be considered when selecting a preferred development strategy. This package of work will be undertaken as part of the Preferred

Options stage in preparation of the Core Strategy. Further explanation of this work is contained in the Preferred Options Project Plan and Methodology Statement (see **Agenda Item 7**).

2.1.5 The statistical analysis attached at **Essential Reference Paper E** is split into three parts. Part I provides an analysis of the overall response showing who responded and how they responded. It includes the following charts:

- Overall response
- Total response showing private individuals and others
- Response by type of organisation
- Responses by source
- Response by source for East Herts Town and Parish Councils
- Respondents by settlement

2.1.6 The consultation was the first to be run online: as such, the 200 web responses are seen to be a positive achievement, entailing significant savings in staff time and resources. Officers hope to achieve an even greater proportion of web responses to future consultations, building on the experience gained as part of this consultation.

2.1.7 Part II provides a demographic analysis of the 110 (9.8%) respondents who chose to complete the monitoring form. The information collected included the following:

- Age group
- Gender
- Race/ethnicity
- Do you consider yourself to have a disability?
- Do you work in East Herts?

2.1.8 Although the number of respondents is quite small, this data has been included to show the type of information the Council has collected. In future the Council will seek to collect further demographic information, whilst balancing this against making it easy for people to respond to consultations efficiently. Analysis of demographic information is useful in that it can help ensure that future consultations reach as wide an audience as possible, reflecting the full range of views and opinions by being effectively targeted through the most appropriate medium.

2.1.9 Finally, Part III provides an analysis by consultation question

number. These results in particular must be read in conjunction with any comments made for each question. Total responses by question are given in the chart on page 18 of **Essential Reference Paper E**. This chart shows a significant boost in response for those questions included on the Summary Leaflet distributed to households and businesses. The charts also include some geographical analysis of responses for several of the questions where useful.

- 2.1.10 A large number of responses to Question 43 were received from the Stop Harlow North campaign, using one of their standard response forms and statistical analysis of these is presented for completeness. For information, a screenshot of the Stop Harlow North Campaign webform is attached at **Essential Reference Paper F**.

2.2 Summary Leaflet

- 2.2.1 The Issues and Options consultation was the first time the Council had actively distributed a Summary Leaflet, as part of a planning policy consultation. 72% of the responses to the consultation were made using the Summary Leaflet (excluding Stop Harlow North postcards etc).
- 2.2.2 The purpose of the Summary Leaflet was three-fold. Firstly, to raise awareness about the consultation; secondly, to try and target those households who do not normally engage in the plan-making process; and thirdly, to encourage those who do wish to engage to read the full consultation document and respond to the full questionnaire.
- 2.2.3 Concerns were raised by some residents that they had not received their copy of the Summary Leaflet. These concerns were drawn to the attention of the distribution company, and where this was an issue, re-delivery was undertaken as appropriate. Additional leaflets were also circulated to parish clerks and at a number of evening parish engagement sessions with East Herts Council's then Executive Member for Planning Policy and Transport. It should also be noted that the leaflet was distributed to the circa 53,000 households in East Herts, not its 135,000 residents.
- 2.2.4 The Summary Leaflet set out the main issues and four of the questions from the Issues and Options consultation document. Question 1 was Question 22 in the consultation document and sought responses on the Development Strategy Options A to F.

- 2.2.5 Question 2 was a composite of Questions 24, 27, 30, 33 and 36 from the Issues and Options consultation document and sought responses about the growth options for *each* town. However, 159 (18%) of respondents to the Summary Leaflet misunderstood this and ranked the five towns against each other, rather than the growth options for each town. Where contact details were provided as requested, respondents were sent clarification and the opportunity to re-submit their responses to this question.
- 2.2.6 Question 3 was Question 41 in the consultation document and sought responses on whether the correct villages had been identified. Question 4 was Question 43 in the consultation document and sought responses on the issue of development to the north of Harlow.
- 2.2.7 Valuable lessons have been learnt from the use of the Summary Leaflet. The fact that not every respondent was able to successfully complete the form means that even clearer instructions and presentation of material is required. Timing of the distribution also needs to be considered. Many of the concerns raised by residents in relation to non-delivery came some weeks after the leaflet had been delivered, following extensive publicity in local newspapers. If leaflets are to be used again, then they need to be delivered *following* a period of awareness raising and publicity in order for residents to look out for the leaflet when it is delivered.

2.3 Late, Anonymous and Other Responses

- 2.3.1 Although the end of the consultation period was 25 November, the Council has accepted comments received up to 31 December 2010. Since that date, further responses have been received including from English Heritage (28 January 2011) and the Bishop's Stortford Civic Federation (7 February 2011), the latter specifically in respect of the development of the Areas of Special Restriction (ASR) to the north of Bishop's Stortford. Additional letters in support of the Civic Federation's position have also been received from a number of Parish Councils around Bishop's Stortford. Whilst these comments cannot formally be taken into account as part of the Issues and Options consultation, Officers are aware of the issues raised.
- 2.3.2 A further 60 responses were received anonymously. Again these cannot be taken into account formally, although the issues raised have been noted. The reason for requesting

contact details is because the Core Strategy will form part of the statutory Development Plan for East Herts District and be examined by an Independent Inspector. Being able to relate comments to individuals/organisations provides the Council with an audit trail of the Core Strategy preparation process ensuring that all comments have been dealt with. It is also of benefit to residents and stakeholders as they can be kept informed on progress and notified of future consultations. This ensures that they do not miss further opportunities to have their say.

- 2.3.3 In November 2010 Planning Policy Officers also attended the East Herts Youth Conference seeking to raise awareness and engage school children in the plan-making process, specifically in respect of Question 22. Again, whilst the results cannot be taken into account formally, the responses have been noted.

2.4 Status of the East of England Plan

- 2.4.1 Members will be aware that the Issues and Options consultation was carried out during a period of some uncertainty in the planning system. On 6 July 2010, prior to the start of the consultation the Secretary of State for Communities and Local Government wrote to local planning authorities abolishing regional strategies including the East of England Plan.

- 2.4.2 Some respondents have therefore questioned, firstly, why the consultation was carried out, and secondly, why it was based on the East of England Plan that had recently been revoked? However, East Herts Council took the decision to proceed with the Issues and Options consultation for the following three key reasons:

- 2.4.3 Firstly, and most importantly the East of England Plan has not been revoked or abolished. The Secretary of State was challenged at the High Court and found to have acted *ultra vires*. Regional strategies can only be abolished by Act of Parliament and until the Localism Bill receives Royal Assent (expected in Autumn 2011 at the earliest) the East of England Plan remains extant. However, it should be noted that subsequent to the Issues and Options consultation a more recent High Court challenge has concluded that it is for local planning authorities to decide what weight to give to the Government's intention to abolish regional strategies. As a postscript to this, in May 2011, the Court of Appeal accepted that the Government's intention to revoke regional strategies may only be worthy of being given

weight in very few cases in which the proposed abolition of regional strategies will be relevant.

2.4.4 Secondly, the Government has clearly stated that local planning authorities should continue to prepare local development frameworks, reflecting local people's aspirations and addressing important issues such as climate change, housing and economic development in their areas. Postponing the Issues and Options consultation until after the Localism Bill has been enacted would lead to significant delays to the plan-making process which could result in 'planning by appeal'.

2.4.5 Thirdly, as had been stressed throughout the run-up to the consultation and during the consultation itself, the Issues and Options is just the first formal stage of consultation. As such, the actual number of homes (as set out in the East of England Plan) is less important than identifying broad locations. If the number of homes required changes, then the Core Strategy can accommodate this in due course. The Issues and Options is a discussion document; it is not the final document.

2.5 East Herts Housing Requirement

2.5.1 In respect of the number of homes that need to be accommodated across East Herts by 2031 (known as the housing requirement), a number of respondents challenged both the need for any housing whatsoever and the assumption that the need was approximately 8,500. (This number being the 'to-find' figure based on the East of England Plan target of 660 dwellings per annum).

2.5.2 East Herts Council does not dispute the need to provide additional homes across the District to meet the needs of the existing and future population. The question, however, is what number of homes is required?

2.5.3 East Herts Council did not object to the District housing requirement as set out in the East of England Plan. Despite being "imposed from central Government", the housing figures in the East of England Plan are based on demographic forecasts and modelling. Furthermore, the East Herts figure was broadly similar with the previous Hertfordshire County Council Structure Plan 1991 - 2011 figure. As such, until further technical work is undertaken, East Herts Council has accepted the figure of 660 dwellings per annum.

- 2.5.4 Notwithstanding the above, in light of the impending abolition of the East of England Plan it is appropriate for East Herts Council to undertake technical work to assess the housing requirement for the District. This approach of a locally derived assessment of housing need has also been suggested by a number of respondents to the Issues and Options consultation and work is currently ongoing in this respect.
- 2.5.5 It is intended that the findings of this technical work will be reported to the next LDF Executive Panel, currently scheduled for November 2011.

2.6 Summary of Issues - Overview

- 2.6.1 The remainder of this report summarises the issues raised to the Core Strategy Issues and Options consultation. Unlike previous consultations, Officers have not responded to individual comments. Instead, the comments that have been received have been grouped together into relevant issues and it is these issues that will be used as the basis for the preparation of the next stage of the Core Strategy: the Preferred Options document. In identifying the issues, the comments have been subject to interpretation.

Figure 2: List of Essential Reference Papers

ERP	Chapter	Question Number
G	1 - Background & Context	1, 2
H	2 - Key Issues and Vision	3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21
I	3 - Development Strategy	22, 23
J	4 - Bishop's Stortford	24, 25, 26
K	5 - Buntingford	27, 28, 29
L	6 - Hertford	30, 31, 32
M	7 - Sawbridgeworth	33, 34, 35
N	8 - Ware	36, 37, 38
O	9 - Villages	39, 40, 41, 42
P	10 - North of Harlow	43

- 2.6.2 The following sections of this Report set out a 'snapshot' of the issues raised in order to capture the flavour of the comments to the Issues and Options consultation. Summaries are arranged by chapter and question. For a full appreciation of the issues raised for each question, please refer to the relevant **Essential**

Reference Paper (ERP) attached to this report, as shown in Figure 2 (above).

- 2.6.3 It should be noted that the comments made in response to the questions may not reflect the “results” of the statistical responses as set out in **Essential Reference Paper E**. As such, the summaries of the issues raised should be read alongside the statistical analysis.
- 2.6.4 A conscious decision was taken to base the consultation around a series of specific questions and not to have a question seeking ‘general’ or ‘any other’ comments. It was hoped that this approach would help focus the responses. This succeeded to a certain extent with those respondents who submitted comments using the online consultation portal having to submit all comments against one of the 43 questions. However, respondents submitting comments by email or letter were not subject to the same ‘restrictions’. When inputting email and letter responses onto the consultation portal (in order to ensure that all responses are publically available), Officers have endeavoured to place comments under the most appropriate question.
- 2.6.5 A number of comments, however, did not relate to the topics or questions being asked and as such, in order to upload them onto the online consultation portal for public viewing, an additional question has been created: Question 44. The summary of these miscellaneous issues is attached at **Essential Reference Paper Q**. Many of these comments concerned the consultation itself, including whether the Core Strategy would actually fit with local wishes.
- 2.6.6 Many comments naturally reflect the opinions and vested interests of the respondents. This is particularly the case in respect of identifying potential locations for development. It will be crucial, therefore, to ensure that any conclusions the Council draws in the preparation of its Preferred Options are based on legitimate planning considerations.
- 2.6.7 Notwithstanding the above, some of the comments related to the suitability or otherwise of specific sites. On the whole, whilst these comments are not relevant to the Core Strategy (which is concerned with strategic planning issues), these comments will be taken into account as part of the Strategic Land Availability Assessment (SLAA) technical work which is concerned with the

suitability of specific sites (see **Agenda Item 9**).

2.6.8 Some respondents misinterpreted the purpose of the consultation. The Issues and Options is not the final plan: it simply sets out the issues facing East Herts and presents a series of options for dealing with those issues. As the Core Strategy progresses it will evolve and the preferred approach will emerge.

2.6.9 This was especially the case in respect of the visions where it was felt by some respondents that the visions were too generic. Indeed, as the Council refines its options, these visions will become more precise and clearly set out what East Herts will be like in 2031. Work will also be undertaken to ensure that the visions are deliverable rather than purely aspirational. In terms of comments, notably, the Environment Agency noted that the visions would benefit from reference to managing flood risk and using new development to contribute to reducing existing flood risk, whilst the Hertfordshire Biological Records Centre has requested that the vision should protect the natural environment.

2.7 Summary of Issues - Chapter 1

2.7.1 The two questions in this chapter related to two accompanying technical documents that supported the Issues and Options Consultation: the Sustainability Appraisal Report and the Habitats Regulations Assessment, both prepared by Scott Wilson Ltd, consultants engaged by the Council to undertake such work.

2.7.2 A key area of concern raised throughout the consultation was the issue of infrastructure, both in terms of problems with existing provision (e.g. at capacity, inadequate) and the impact of new development on existing infrastructure (e.g. not being able to cope with increased demand). The issue of infrastructure provision is a crucial element of the plan-making process and in order for the Core Strategy to be found sound (i.e. fit for purpose) at examination, it will be accompanied by an Infrastructure Delivery Plan (IDP) setting out what infrastructure is required, when it will be built and, crucially, who will pay for it. The Preferred Options Project Plan and Methodology Statement (see **Agenda Item 7**) sets out the Council's approach to planning for infrastructure in greater detail.

Question 1: Sustainability Appraisal

2.7.3 In general, the majority of the responses to Question 1 were not specifically related to the sustainability appraisal document but to wider sustainability issues. Importantly, it was felt that the

sustainability appraisal needs to be re-assessed in the light of new evidence and changes to national and regional policy. This is particularly the case for housing and employment numbers and development to the north of Harlow.

2.7.4 Respondents felt that there were some conflicts between different objectives (i.e. the achievement of some objectives being to the detriment of others). There was also disagreement in some of the scores and conclusions given for some development options. The use of spatial areas as a method of assessing objectives was questioned as objectors felt it disguised the impacts on smaller settlements within a larger spatial area.

2.7.5 The areas that respondents were most concerned about and focused on were water infrastructure and the impact of development on natural resources and biodiversity. There was however, a lack of consensus on the correct approach to dealing with the categorisation and development of the villages, although there was support for allowing development in the villages in order to retain their vitality over the environmental concerns of building in the rural area. Importantly, respondents felt that the negative issues raised in the sustainability appraisal must be resolved prior to determining the development strategy.

Question 2: Habitats Regulations Assessment

2.7.6 It was commented that due to the location of the District's wildlife sites and sensitive habitats, there was a significant risk that inappropriate development could have both direct and indirect effects and cause detrimental harm to the quality of these areas. It was felt that more work will need to be done to ensure that these effects are understood and mitigated against, and in particular that water issues (scarcity, quality, disposal) are addressed as a priority before any new development takes place. Respondents also felt that the Habitats Regulations Assessment needed to be re-assessed in the light of new evidence and changes to regional and national policy.

2.7.7 In respect of green infrastructure, respondents felt that more should be done to buffer these much valued assets from the impacts of development through monitoring, education, stewardship, protection, expansion and enhancement programmes.

2.8 Summary of Issues - Chapter 2

- 2.8.1 Chapter 2 included a total of 19 questions designed to get feedback about the LDF Strategic Objectives, Policy Options and Vision for East Herts. Both the LDF Strategic Objectives and Chapter 2 were arranged by theme (see Figure 3). Each theme included two questions, the first looked at the purpose of the objectives themselves and the second looked at the approach to dealing with the policy options identified under each theme.

Figure 3: List of LDF Themes

- Theme 1 - East Herts Energy and Climate Change
- Theme 2 - East Herts People and Community Safety
- Theme 3 - Housing East Herts
- Theme 4 - East Herts Character
- Theme 5 - East Herts Economy, Skills and Prosperity
- Theme 6 - East Herts On the Move
- Theme 7 - East Herts Health, Wellbeing and Play
- Theme 8 - Green East Herts
- Theme 9 - East Herts Monitoring and Delivery

- 2.8.2 The LDF Strategic Objectives were identified through an analysis of the feedback from the awareness raising consultation in 2008. For reference, the LDF Strategic Objectives are attached as **Essential Reference Paper R**. Importantly the Preferred Options document will need to demonstrate how the Council's proposed approach meets these objectives.

- 2.8.3 Overall, there was general support for the Strategic Objectives, which covered the expected topics. However, some respondents expressed concern over whether they are achievable, whilst others sought stronger wording and more specific measures to be included. Doubts were raised as to the effectiveness of proposed policies and the willingness of East Herts Council to enforce strengthened policies, against pressure from developers.

Theme 1 - East Herts Energy and Climate Change
Question 3: LDF Strategic Objectives

- 2.8.4 It was pointed out that whilst development generally may be incompatible with climate change objectives, given the increase in emissions from cars and homes etc, the location and mix of development may also affect carbon emissions. There were also some concerns about the possible impact of climate change policies, for example, the visual intrusion of wind turbines,

pollution from biogas, and parking restrictions.

- 2.8.5 Respondents felt that reference should be made in ECC1 to various energy generation sources, energy efficiency at existing housing stock, home working, low carbon transport and linking air quality and carbon emissions. It was also suggested that targets for carbon savings should be included in the Core Strategy and not left to subsequent policy documents. In ECC2, mention should be made of habitat linkages/green infrastructure, and local food production.

Theme 1 - East Herts Energy and Climate Change

Question 4: Policy Options

- 2.8.6 Many of the issues raised were the same as those already dealt with under Question 3, although additional issues raised included the potential benefits of coppiced woodfuel for biodiversity as well as clean energy. It was also suggested that the Key Diagram should show the location of important biodiversity resources and proposed areas for enhancement. Onsite targets should be complemented by a requirement to offset all remaining emissions through a local carbon mitigation fund. Respondents also pointed out the need to consider scheme feasibility and viability.

Theme 2 - East Herts People and Community Safety

Question 5: LDF Strategic Objectives

- 2.8.7 Respondents commented that design standards produced by the Crime Prevention police architect are not currently adhered to which makes objective PCS1 meaningless and that the reference to 'reduce the fear of crime' should be removed as this goes beyond the controls of the planning system. There was strong support for PCS3 from Town and Parish Councils although there was still concern as to whether this objective could be achieved as it was felt that local views are often ignored in the determination of planning applications. Concern was expressed at the likely increase in population. It was suggested that household formation forecasts should be based solely on the trend in the resident population and internally generated growth rather than including inward migration figures. Comments were also made about the mix of housing and how this had affected the population balance, and concern was expressed about how the housing needs of an ageing population would be addressed.
- 2.8.8 It was suggested that existing community facilities needed to be enhanced and expanded, particularly in villages which have few useful facilities. Concern was specifically raised about the loss of

D1 designated sites which are a valuable asset to the community. There were a number of new objectives or additions to objectives suggested which link in with concerns expressed above including keeping the increase in population as low as possible and increasing the amount of affordable housing provided to maintain the population balance.

Theme 2 - East Herts People and Community Safety

Question 6: Policy Options

- 2.8.9 There was general support for the proposed approach and links identified with many of the other themes, with comments expressing clear support for policies to address housing mix, type and tenure to maintain mixed-age communities. However, the specific use of the word 'vibrant' was challenged due to confusion over its meaning. It was commented that new community facilities should meet the needs of all sectors of society and not specifically cater for disadvantaged groups. Particular emphasis was given to the need for a robust policy to protect D1 community facilities from redevelopment amidst concern that current policy has failed in this respect. It was felt that designing developments in an appropriate way to reduce crime and anti-social behaviour may be part of the solution but would not solve the problem.
- 2.8.10 Respondents also felt that a number of additional bullet points should be added to the Policy Options. Suggestions included policies to address: provision of mobile services to villages; support for local social infrastructure and culture in villages; specialised forms of older people's accommodation; the issue of 'fear of crime'.

Theme 3 - Housing East Herts

Question 7: LDF Strategic Objectives

- 2.8.11 The majority of comments concerned the housing target and its basis being the East of England Plan. Whilst this issue is dealt with elsewhere in this report (see Section 2.5 and 2.9), it is worth noting that as well as objection to the East of England Plan housing target, comments to this question included specific support (since it is founded on robust evidence and still part of the statutory Development Plan), as well as comments concerning any potential review and the consequences of reducing the housing target especially without robust evidence. It was also pointed out that basing the housing target on local needs could result in a higher figure than in the East of England Plan. Respondents also highlighted the relationship between housing and economic growth.

- 2.8.12 In respect of HOU1, respondents pointed out that any standards must be applied flexibly. There was also support for the objective to locate homes in sustainable and suitable locations although ensuring a mix of housing was considered important. There was support for objectives HOU3 and HOU4 relating to Gypsy and Travellers and specialist accommodation, although in respect of the former, it was noted that the policy context has changed in that the East of England Plan is being revoked. In respect of HOU5 (affordable housing), respondents pointed out that any target must be flexible, consider development viability, and based on the individual circumstances of each site. The issue of affordable housing for local people was also raised as well as greater reference to the Council's Strategic Housing Market Assessment (SHMA).

Theme 3 - Housing East Herts

Question 8: Policy Options

- 2.8.13 On the whole, the approach to the policy options was considered to be broadly correct although general comments were made against specific aspects of the objectives which are dealt with above. It was felt that an additional bullet point was needed in the Policy Options that referred to housing being located in sustainable locations including previously developed land and Green Belt sites adjacent to built-up areas.

Theme 4 - East Herts Character

Question 9: LDF Strategic Objectives

- 2.8.14 There was broad support for the Strategic Objectives although some concern was raised as to whether the objectives could be achieved in practice and strong disagreement at the suggestion that development north of Harlow could combine with the heritage of East Herts in a positive way. It was also felt that further consideration should be given to local historic environment data and Planning Policy Statement 5: Planning for the Historic Environment (PPS5). Comments were also made about the landscape character of a number of individual settlements.
- 2.8.15 It was suggested that CHA1 be amended to place a greater emphasis on the Rural Area beyond the Green Belt. Many respondents expressed support for the preservation of the Green Belt to prevent coalescence between settlements, although there was some support for a Green Belt review and acknowledgement that to satisfy the housing requirement, there may need to be some release of Green Belt sites. Hertfordshire County Council

commented that school sites should be removed from the Green Belt to aid the provision of additional educational facilities. New objectives to protect the Green Belt boundary with Stevenage and other major towns and to enhance the biodiversity of East Herts were suggested. There was a mixed response for objective CHA3 with some respondents showing strong support whilst others expressed concern that the wording of the objective was too prescriptive and that modern, contemporary design could complement the existing local environment.

Theme 4 - East Herts Character

Question 10: Policy Options

- 2.8.16 There was general support for the proposed approach, particularly with regard to the Green Belt, although there were comments that the policy options were too vague and contradicted the objectives. There was also concern that a policy that viewed the Green Belt as an absolute constraint could prevent the most sustainable development strategy for the district from being established.
- 2.8.17 It was commented that the landscape policy should contain reference to traditional orchards and that heritage assets identified at a local level should have the same protection in policy as nationally recognised assets. Some comments were made regarding the inclusion of minimum standards and parking standards in the policy addressing design of new developments. It was felt that an additional bullet point was needed in the Policy Options that referred specifically to the Rural Area beyond the Green Belt, and another to address the maintenance of open spaces within a settlement boundary in order to maintain the character of the settlement.

Theme 5 - East Herts Economy, Skills and Prosperity

Question 11: LDF Strategic Objectives

- 2.8.18 Respondents highlighted the need to recognise the link between the under-supply of housing (and consequent high prices) on the competitiveness of business in regard to the high cost of labour. This was combined with a need to ensure there is a degree of flexibility in economic policies that allow existing employers to expand/redevelop in order to retain their presence. It was felt that the objectives should acknowledge that supporting the rural economy is wider than simply allowing farm diversification since even the smallest village can be an appropriate location for general rural economic growth. It was also commented that the Council needs to be more supportive of the green economy and

the way green tourism and green industries can contribute to economic development and climate change mitigation.

- 2.8.19 There was also consensus amongst respondents that high quality environments encourage investment and help to attract and retain a suitable workforce. However, education and the need to assist the next generation of the working population was felt to be of vital importance. Hertfordshire County Council commented that there are locations in the district with an education capacity deficit which need to be addressed.

Theme 5 - East Herts Economy, Skills and Prosperity

Question 12: Policy Options

- 2.8.20 Comments included the need to ensure flexibility in economic policies, including retail, in order to maintain the retention and viability of existing locations. At the same time, it was felt that recognition should be given to the role of retail and leisure as major employment generators as well as the contribution made to the East Herts economy of employers in neighbouring towns.
- 2.8.21 Some comments were made about elaborating on the policy options and dealing with more of them in the Core Strategy rather than leaving important issues until future planning documents, including the approach to retail and leisure within both urban and rural locations as an important element of the economic profile of the district. Respondents also felt that the Council should work more closely with partners, including neighbouring authorities through a Local Enterprise Partnership, and large employers and educational providers to establish policies for achieving the district's economic potential.

Theme 6 - East Herts On the Move

Question 13: LDF Strategic Objectives

- 2.8.22 Whilst the aim to shift usage from the private car to other more sustainable means of transport was seen as laudable by respondents, the reality of a lack of alternatives was highlighted as an obstacle to achieving this. Dispersement of the population, reliance on the car, limited access to/reliability of passenger transport provision, difficulties associated with east-west travel across the District and capacity/peak crowding issues of trains featured high on the list of respondents concerns.
- 2.8.23 Also raised were issues in respect of the need to address car parking, congestion, existing road infrastructure and maintenance, and the need to do more to facilitate walking, cycling and

equestrian modes, including the need to manage recreational use in rural locations. In respect of OTM2 and the location of development in particular, whilst there was broad support for the principles and minimising the need to travel, there was also concern that this could detrimentally affect smaller villages. In respect of OTM6, Stansted Airport Ltd emphasised the positive role that the airport plays in facilitating local and international access and providing jobs. The Highways Agency wishes to work with both East Herts Council and Hertfordshire County Council on developing a transport evidence base.

Theme 6 - East Herts On the Move

Question 14: Policy Options

- 2.8.24 Whilst there was broad support for the Policy Options, many respondents believed that locating development in sustainable locations would result in development focused on the five towns or major transport routes, which may not be the right way forward. Some respondents requested that accessibility to key services and facilities be improved and maintained. In terms of future policy options, suggestions included: car sharing/car club schemes; airport access issues; the use of electric cars; maximising the use of waterways; improved cycling offer; community buses; improved passenger transport provision (especially in rural areas); park and ride provision; and other car parking matters.

Theme 7 - East Herts Health, Wellbeing and Play

Question 15: LDF Strategic Objectives

- 2.8.25 There was general support for the Strategic Objectives, including from Natural England. Whilst it was acknowledged that all new development should be supported by adequate facilities, concerns were raised over insufficient health facilities generally. Although there was specific support for HWP2, some respondents raised concerns over whether the Council should proactively support the diversity of faith communities, questioning the need for a separate objective. It was suggested that HWP5 should be amended to include reference to allotments together with access to the natural world. New objectives to protect village ways of life and to support the Living Landscapes initiative were suggested. It was commented that the role of the Lee Valley Regional Park will need to be strengthened at the next stage.

Theme 7 - East Herts Health, Wellbeing and Play

Question 16: Policy Options

- 2.8.26 There was general support for the proposed approach, including support from Sport England and Natural England. Particular concern, however, was raised that the Policy Options as drafted do not address the issue of protecting existing facilities (e.g. community, open space, sport and recreation) from other forms of development nor do they seek to ensure their continued viability. It was also suggested that the protection and enhancement of facilities should be dealt with in the Core Strategy and not left to subsequent LDF documents.

Theme 8 - Green East Herts

Question 17: LDF Strategic Objectives

- 2.8.27 It was felt that the Council should adopt a more proactive and stronger stance on all aspects of environmental protection, including water supply, processing and flood management. Waste management in general and in particular waste water and water supply are of great concern given the capacity issues and constraints of the current infrastructure and the threat of further developments exacerbating these issues. Concerns about the risk of flooding were countered by advocates suggesting using land at risk of flooding for development provided it meets the tests of Planning Policy Statement 25: Development and Flood Risk (PPS25).
- 2.8.28 Respondents commented that green spaces and allotments should be protected for recreational as well as ecological benefits and that Green Infrastructure is a vital part of the character of East Herts in protecting the District's ecology and countering the effects of climate change. It was felt that Green Infrastructure should, therefore, be given the greatest level of protection with enhanced measures to increase the land area of such spaces to provide buffering from development and increased human activity.

Theme 8 - Green East Herts

Question 18: Policy Options

- 2.8.29 British Waterways stated that Green Infrastructure should be given greater priority and detailed guidance on specific sites should be contained in the Core Strategy, as this is integral to decisions on the development strategy. Respondents also felt that the Core Strategy should raise the profile of wildlife sites, woodlands and traditional orchards, providing additional protection to sites of local significance. In addition, it was

suggested that a new policy option on the creation of new sites should be included. Comments also identified that water abstraction was a significant issue for the District's rivers, including their ecology and water supply, and that new developments exacerbate these problems. Natural England supported the proposed approach to Policy Options although respondents commented that infrastructure constraints, flood risk, and water consumption should be dealt with in the Core Strategy prior to determining the development strategy.

Theme 9 - East Herts Monitoring and Delivery

Question 19: Theme 9 - LDF Strategic Objectives

- 2.8.30 There was broad support with particularly strong support shown for MAD1. Comments were made that the existing infrastructure in the District is inadequate and significant concern was expressed over the timely provision and funding (especially in the current economic climate) of additional infrastructure to support development. Suggestions were made that detailed assessments of infrastructure requirements need to be carried out prior to any development and development should be made conditional upon the provision of the infrastructure to support it. The importance of considering growth in neighbouring districts to determine infrastructure provision was also raised. There was a mixed response to objective MAD3 with some respondents showing strong support and emphasising that developer contributions need to be enforced and subsequently used within the geographical area of the development. Other respondents felt that the viability of development proposals needed to be considered when addressing the use of developer contributions to achieve the outlined goals.

- 2.2.31 Comments were received from stakeholders including Thames Water, National Grid, the Highways Agency and Hertfordshire County Council as well as Hertfordshire Constabulary and Essex County Council expressing their wish to work with East Herts Council in the preparation of the Infrastructure Delivery Plan. Thames Water suggested specific policy wording that could be used in the Core Strategy to address 'Water and Sewerage Infrastructure Capacity/Development'.

Theme 9 - East Herts Monitoring and Delivery

Question 20: Policy Options

- 2.8.32 There was general support for the proposed approach, with a policy for infrastructure provision to accompany development regarded as being of major importance. Some respondents felt

that all of the bullet points raised were of sufficient importance to be included in the Core Strategy and not deferred to later documents. It was commented that the monitoring of key targets needed to include biodiversity and the maintenance and enhancement of the built and natural environment. It was stated that the monitoring framework needed to make clear how the policies would be prioritised as they could not all be achieved at the same time. Concern was expressed at the cost of monitoring so it was suggested that this should be carried out by central government or local voluntary bodies. It was suggested that mandatory requirements were put in place in respect of developer contributions as 'guidance' would fail to get the desired outcomes. However, some respondents felt that policy in this respect should be flexible to take into account the viability and therefore delivery of certain sites.

Question 21: East Herts LDF Vision

- 2.8.33 There was both general support and objection to the vision; the latter largely focused on seeking to ensure that the purpose of the vision is clear and it sets out how the Core Strategy will deliver change in East Herts, setting out what, where, when and how development will be delivered. A number of respondents stated that the vision should refer to the need to house the District's population and one respondent questioned the assumption that life in 2031 will be similar to life in 2011. Comments were also made in respect of the specific wording of the vision statements and amendments were suggested.

2.9 Summary of Issues - Chapter 3

- 2.9.1 Chapter 3 dealt with the District wide approach to development and included two questions on the broad locations for growth and how that growth should be distributed. It also included the following related topics. Although specific questions were not asked about these topics, a significant number of comments were received. These are being taken into account as appropriate.

- How many homes we need
- How many jobs we need
- Land availability, brownfield land, greenfield land
- The need to review the Green Belt

- 2.9.2 The issue of how many homes are needed is discussed in Section 2.5 of this report and it is also touched upon in the summaries to Theme 3 (Questions 7 and 8 - see Section 2.8 of this report). Notwithstanding this, it is worth reiterating that this issue

generated a strong level of opposition (to both the principle and extent of housing growth) as well as acknowledgment by other respondents of the socio-economic implications of housing provision and that housing is required to meet local needs, assist with housing affordability and sustain and promote local economic prosperity.

- 2.9.3 The relationship between housing growth and economic growth was also stressed by respondents in respect of new job provision. The reality of the jobs figure was also queried. This issue is also dealt with in the summaries to Theme 5 (Questions 11 and 12 - see Section 2.8 of this report).
- 2.9.4 The issue of land availability was raised by some respondents, including a preference for the re-use of empty properties and previously developed or brownfield land. This issue is closely related to the need to review the Green Belt, which was a very emotive topic.
- 2.9.5 Many respondents felt strongly that the Green Belt should be protected at all costs and as such, development should be located in locations outside of the Green Belt. Other respondents accepted that there would need to be some Green Belt releases in order for development to occur in sustainable locations such as around the four towns of Bishop's Stortford, Hertford, Sawbridgeworth and Ware. Buntingford is not in the Green Belt, and the distinction between Green Belt and greenfield land (i.e. undeveloped land) should also be noted.
- 2.9.6 The lack of availability of land within the existing settlements and the subsequent need for a Green Belt review was queried by some respondents who objected that the Issues and Options consultation had been based on the Call for Sites. Whilst the Core Strategy will not deal with specific sites, it must demonstrate that sufficient land will come forward for development within the identified broad locations in order to meet the district housing requirement. For information, the issue of land availability is considered in more detail in the separate Strategic Land Availability Assessment (see **Agenda Item 9**).

Question 22 - Broad Locations for Growth

- 2.9.7 Question 22 was perhaps the key question in the Issues and Options as it sought comments on the Development Strategy for East Herts. It presented six options (A-F) for distributing development across the District based on variations of the

following settlement hierarchy. This was a modified version of the hierarchy in the current East Herts Local Plan Second Review 2007 that identifies Six Main Settlements and Category 1, 2 and 3 Villages. The key difference being the treatment of the settlement of Stanstead Abbots and St Margarets which, for the purposes of the consultation, was 'demoted' from a Main Settlement to a Larger Service Village.

- Towns
- Larger Service Villages
- Smaller Service Villages
- Other Villages and Hamlets

2.9.8 In respect of the six options A-F, there were a considerable number of objections, including 172 standard responses organised by the Bishop's Stortford Civic Federation, commenting that *"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"*. A number of alternative suggestions for generating a development strategy were made as well as a range of specific and non-specific locations.

2.9.9 Specific comments in support of, and objecting to each individual option were also made, often in disagreement, particularly Options A (Towns), D (Towns, Larger Service Villages, Smaller Service Villages, and Other Villages/Hamlets) and E (Towns, East of Stevenage and East of Welwyn Garden City). It should be noted that many respondents made specific comments in respect of the suitability of specific settlements in response to the questions in the settlement chapters (4-9).

2.9.10 Respondents in support of Option A (Towns) commented that with their existing services, facilities and infrastructure, the towns were ideal sustainable locations for development. Respondents that disagreed cited congestion, threats to the character of the town, and the burden on existing services. Option A was also opposed by those who felt that concentrating development in the towns would not meet the demands of rural communities. There was also strong support for Option B (Towns and Larger Service Villages) including striking a balance between supporting and accessing existing services in both towns and larger villages without placing too much pressure on the towns. There were

however objections, including from those who felt Option B would lead to overdevelopment in the larger villages.

- 2.9.11 There was both support and objection to Option C (Towns, Larger Service Villages and Smaller Service Villages) which was akin to the current Local Plan, although some respondents pointed out that it was not a true reflection of the Local Plan since the settlement of Stanstead Abbots and St Margarets was not one of the Six Main Settlements. Option D (Towns, Larger Service Villages, Smaller Service Villages and Other Villages/Hamlets) was considered to be perhaps the fairest approach although some respondents pointed out that it would result in development in unsustainable locations (i.e. villages with little or no services). It was felt that such an approach would not deny small settlements the chance to grow although the precise distribution to each settlement was considered to be crucial.
- 2.9.12 There was broadly equal support and objection to Option E (Towns, east of Stevenage and east of Welwyn Garden City) with respondents acknowledging the benefits of large scale urban extensions, but raising concerns with infrastructure (especially water), the relationship to the existing towns and impact on the Green Belt. Option F (Settlements within Transport Corridors) received the most number of objections from respondents concerned with the potential increase in car dependency and potential for urban sprawl and coalescence between identified towns and villages along the transport corridors.
- 2.9.13 From the responses it is apparent that there was no clear preferred option; rather locations need to be assessed as to their individual suitability, based on other capacity and constraint considerations. Indeed, ensuring development is sustainable was a key theme to emerge.
- 2.9.14 In respect of the settlement hierarchy itself, a number of respondents queried the categorisation of the settlements of Buntingford, Standon and Puckeridge, Stanstead Abbots and St Margarets, and Watton-at-Stone. In particular, it is commented that Buntingford is not comparable to the other four towns of Bishop's Stortford, Hertford, Ware and Sawbridgeworth, primarily because of its small size and absence of a rail link. Alternative suggestions include a preference for Stanstead Abbots and St Margarets (since it has a rail link) and the creation of a new tier of service settlements between the Larger Service Villages and the four towns.

2.9.15 Members will recall that the Issues and Options consultation specifically discounted the option of a 'new settlement' because of issues about deliverability and the fact that such an option would not have been in conformity with the East of England Plan. Whilst there was support for this approach, a number of respondents proposed the creation of a new settlement to meet the district's development needs. In light of the impending revocation of the East of England Plan, it is proposed that further engagement with infrastructure stakeholders is undertaken in respect of this issue to resolve how realistic and feasible such an option is in terms of deliverability.

2.9.16 Members will note from **Essential Reference Paper I** that whilst many of the responses to Question 22 are related to the Development Strategy, they are not specific to the question itself. They are nonetheless important and these issues will be dealt with accordingly.

Question 23 - Approaches to Housing Distribution

2.9.17 This was perhaps the most abstract question in the Issues and Options consultation. The majority of respondents commented that no one approach was suitable, and that housing should be in the most sustainable locations based on an assessment of the capacity and constraints of the settlement. A number of respondents advocated a combination of approaches favouring approaches II (adjusted proportional distribution) and V (distribution by land availability), whilst others commented that housing should be distributed based on local needs. The focus of development on the towns was also questioned as whether it was the most appropriate way forward.

2.10 Summary of Issues - Chapter 4

2.10.1 Chapter 4 asked three questions in respect of options for Bishop's Stortford. It was commented that the town has reached its natural capacity and that there is no need for more new homes. Alternative approaches to development were also suggested. Whilst it was felt that the bypass sets a defined limit to development, concerns were expressed about the recent number of new flats, development in the Green Belt, infrastructure capacity, and adding to existing congestion in the town.

Question 24 - Growth Options for Bishop's Stortford

2.10.2 186 comments (including 145 standard Civic Federation responses) suggested that none of the options were suitable, and objected to the development of the Areas of Special Restraint

(ASR), which have already been identified for development. Option 1 (existing built-up area) received some support as the best option, although concerns were raised about flooding and existing levels of traffic congestion which could be exacerbated.

2.10.3 Respondents felt that Option 2 (northeast) is in a highly accessible location, has a strong relationship to existing employment and retail offerings, and could help to balance housing provision at the ASRs nearby, although concern was expressed about the impact on the character of Birchanger village and the integrity of Birchanger Wood. Respondents raised concern about the suitability of Option 3 (east) that it could lead to increased congestion at the gateway to the town, be noisy and polluted and result in harm to the visual separation of the town and M11. Concern was also raised that Options 4 (southeast) and 5 (south) could lead to coalescence with Sawbridgeworth.

2.10.4 In respect of Stansted Airport, it was noted that the airport is expected to grow to 35 million passengers during the plan period. It was also commented that Options 3, 4, and 5 would be affected by aircraft noise. Development should be avoided in areas of 60 decibels: Options 3 and 4 would be over 60, and Option 5 would be under 60 decibels. It was pointed out that since Options 2 and 4 lie within Uttlesford any planning decisions there sit with Uttlesford District Council.

Question 25 - Approach to Development in Bishop's Stortford

2.10.5 On the whole, respondents felt that quality of development is more important than density, and that sensitively designed terraces, townhouses and family houses are preferable to the recent trend for cramped 1 and 2 bedroom flats. Some respondents, however, pointed out that density is a site-specific issue that depends on the development strategy. It was also commented that higher density development which may involve the use of less land may make it easier to avoid areas of flood risk.

Question 26 - Bishop's Stortford Vision

2.10.6 Whilst there was support for the vision, several respondents stated that the draft vision is too idealistic and unlikely to be achieved. There were also concerns that the vision did not address the overall level of housing for the town and did not put enough emphasis on economic development.

2.11 Summary of Issues - Chapter 5

- 2.11.1 Chapter 5 asked three questions in respect of options for Buntingford. There was both strong support and strong opposition to the identification of Buntingford as a location for growth. Whilst it was favoured because of its rural location outside of the Green Belt, its small size, absence of a railway and limited range of facilities and services, meant that many considered that Buntingford is not comparable to the other four towns.

Question 27 - Growth Options for Buntingford

- 2.11.2 In terms of the growth options for Buntingford, there was support and objection to development in all locations. The issue of identifying defensible boundaries to development was raised as well as the issue of flood risk. Redevelopment of the former Sainsbury's Distribution Depot to the south of the town was both favoured (in terms of it being the only remaining source of brownfield land within the existing built-up area) and opposed, with opponents believing it to be poorly located for housing development, and in any case, should be retained for employment purposes.

Question 28 - Approach to Development in Buntingford

- 2.11.3 Responses to this question were more generalised with concerns being raised about the impact of higher density development, including in respect of ensuring adequate parking. Conversely though, HCC Passenger Transport Unit commented that higher densities are favoured because they can support commercially viable bus services. There was strong support for a range of densities to attract and retain a mixed population and housing styles.

Question 29 - Buntingford Vision

- 2.11.4 There was both support and objection to the vision for Buntingford, which it was felt needed to capture the essence of the town. The importance of protecting and promoting green space was highlighted whilst the reference to redevelopment of the former Sainsbury's site was also questioned by some respondents.

2.12 Summary of Issues - Chapter 6

- 2.12.1 Chapter 6 asked three questions in respect of options for Hertford. Significant issues raised in respect of Hertford included the need to protect the Green Belt and "Green Fingers"; physical and social infrastructure requirements; need to avoid the potential for coalescence; and the need to create a mixed housing stock.

Some respondents questioned the identification of Hertford as suitable for development and suggested alternative locations.

Question 30 - Growth Options for Hertford

- 2.12.2 There was a fair amount of disparity in the responses including a significant number commenting that none of the Options were preferred due to a number of issues, including increased pressures on already strained services and congested infrastructure, parking difficulties, potential coalescence between Hertford and other surrounding settlements, and the effect on the beauty and cultural heritage of the area. Alternative suggestions included the need for a bypass to accommodate new development; the reuse of commercial buildings for residential; and the possibility of tunnelling under Gascoyne Way.
- 2.12.3 A recurrent theme was the need to concentrate development on brownfield land although this should not be at the expense of employment land in the town. Option 2 (west) was the preferred option of both the Environment Agency and HCC Passenger Transport Unit (HCC PTU), due to the smallest amount of floodplain of any of the Options. HCC PTU also supported this approach as having the best potential to extend existing bus services although concern was raised by others in regard of potential coalescence, road capacity issues, detrimental effect on the Green Belt, and a lack of support from Hertfordshire Biological Records Centre.
- 2.12.4 Option 3 (north) received only limited comments with those in favour citing it as being more appropriate than building within the existing built up area. Objections were raised, however, in respect of the lack of transport links, the impact on existing road infrastructure and the issue of the Bengoe "rat run". Option 4 (south of Hertford) could be a suitable location for a new primary school which could be supported by the critical mass that new development in this location would bring. Whether the critical mass would be sufficient to make commercial passenger transport services viable in this potentially remote location was questioned.

Question 31 - Approach to Development in Hertford

- 2.12.5 Comments received favoured either a lower density approach (in order to restore the character of the town) or higher density development (in order to encourage social interaction and mutual support; movement by foot or bicycle; opportunities for decentralised energy; reduced land take; reduced heating demand; and public transport provision and other local

services/facilities). However, the majority of respondents favoured no specific approach commenting that density should be considered on a site specific basis; follow a mixed density approach in certain locations; and range from high density in the town centre and gradually reduce towards the extremities of the town.

Question 32 - Hertford Vision

- 2.12.6 Broad levels of support were received although some supporters caveated their response by questioning whether the aims could be achieved. The need for changing behaviours was identified as was the threat of the erosion of the town's character. In respect of the Mead Lane element, there was support for the regeneration of the area and also opposition from Hertford Town Council regarding regeneration involving major change of use.
- 2.12.7 Respondents (including the HBRC, Environment Agency and Sport England) also suggested that the vision should include additional issues such as acknowledgement of the need for greenfield/Green Belt development; protection of the natural environment (e.g. "Green Fingers"); the need to avoid development in the floodplain; need to strengthen character of the town; preservation of employment and shopping features; retention of trees; sustainable transport; and need to address playing pitch deficiencies.

2.13 Summary of Issues - Chapter 7

- 2.13.1 Chapter 7 asked three questions in respect of options for Sawbridgeworth. Traffic congestion was an issue along with other infrastructure constraints which respondents considered should be dealt with prior to determining the development strategy. Comments were also received in respect of the suitability of Sawbridgeworth as a location for growth.

Question 33 - Growth Options for Sawbridgeworth

- 2.13.2 There is as much support as opposition for development in all the potential growth directions. There was as much support as opposition cited for all of the growth options suggested for Sawbridgeworth, with a larger number of respondents indicating they would prefer to see no additional development in or around the town. Despite this, statistically the majority of respondents would prefer to see development contained within the existing built-up area (Option 1), although it was recognised that there is already congestion and infrastructure concerns and a lack of available locations for development.

2.13.3 Growth to the south west (Option 2) and west (Option 3) are almost equally preferred following the existing built-up area. Where development must occur on green field sites these should be located as close to the existing built-up area as possible ensuring they are well connected to the town centre and services. In respect of Option 4 (north), whilst it was suggested that land was available and could lead to improved passenger transport services, other respondents raised concern that this location was remote from the town centre and would lead to coalescence with Bishop's Stortford. A by-pass was suggested as a way of forming a new development boundary as well as easing the congestion within the town. Infrastructure capacity remains the biggest concern for all growth options, along with a desire to protect the character of the town, its valuable green assets and access to surrounding countryside whilst preventing coalescence between neighbouring villages and towns.

Question 34 - Approach to Development in Sawbridgeworth

2.13.4 Respondents commented that development density should be decided on a site by site basis and should be intrinsically linked to design, taking into account the local character of the area. Density should also consider local housing needs which suggest family sized homes are needed, which are likely to require larger sites. It was also recognised that higher density developments help to ensure the viability of services, prevent loss of green field land and areas of natural conservation value. However, it was acknowledged that sustainable communities contain a mixture of accommodation. It was also felt that it was vital that areas of flood risk are avoided.

Question 35 - Sawbridgeworth Vision

2.13.5 Respondents were generally supportive of the need to provide for new homes and development in the right locations that are well-connected to the town's existing infrastructure. The wider function of Sawbridgeworth as a service provider for surrounding villages and settlements was supported. Respondents wished to retain the town's character and avoid coalescence with nearby settlements. The town centre should be protected and enhanced but with an exploration into other uses that could support the town and draw visitors in. There was a desire to protect key wildlife areas and natural assets such as the Rivers Orchard and river/canal network. The efficacy of the emerging vision was also questioned although it was widely supported.

2.14 Summary of Issues - Chapter 8

- 2.14.1 Chapter 8 asked three questions in respect of options for Ware. Concerns were raised about the capacity of infrastructure to cope with more development; impact on the character of the town; and erosion of the Green Belt and possible coalescence with neighbouring settlements. Comments were also received in respect of the suitability of Ware as a location for growth, with alternative development options suggested.

Question 36 - Growth Options for Ware

- 2.14.2 It was commented that brownfield development should be prioritised, but acknowledged that there is a shortage of such land within the town. There was also concern that development in the existing built-up area (Option 1) should avoid adding to congestion in the town centre. Whilst it was felt that Option 2 (north) would be accessible by public transport and have good road access to the A10, it was noted that the “Nun’s Triangle” area is part of a registered garden and the area between Wodson Park and High Oak Road is well used by local residents for walking and local events. One respondent raised concerns about cost effective sewerage provision in the High Oak Road and Musley Hill area, although Thames Water is unable to comment until more detailed information on proposals is available.
- 2.14.3 Whilst Option 3 (east) poses minimal flood risk, concerns were raised that without significant new road infrastructure, development in this location could cause congestion in the town centre. It would require new or diverted bus routes. There were also concerns about the impact of development to the south-east (Option 4) on the Lee Valley Regional Park, the floodplain and associated ecology and wildlife, and coalescence issues with Stanstead Abbots. In respect of Option 5 (southwest), there was disagreement regarding sustainability, accessibility, integration with the town, parking and traffic congestion, coalescence with Hertford, use of the recreational facilities and whether sensitive design could mitigate these concerns.

Question 37 - Approach to Development in Ware

- 2.14.4 Whilst it was commented that higher density development would minimise land take, concentrate homes near services, and avoid any coalescence with neighbouring settlements, the flood plain and wildlife sites, the medium density option had the support, amongst others, of the Ware Society, wanting to maintain the character of the town and avoid high density. A low density approach was favoured by those seeking family houses and

better living conditions. The highest level of response, however, was received from those that did not wish to support any specific density; thought that density should be considered on a site specific basis; and thought that density should be determined by existing neighbourhoods to allow range of property types to be built.

Question 38 - Ware Vision

- 2.14.5 The majority of respondents supported or partly agreed with the Vision for Ware. The aspirational nature of the Vision was noted along with the need to restrain growth to achieve it. Sport England commented on the need to address deficiencies identified in the playing pitch strategy; Hertford Regional College suggested wording to accommodate higher educational provision in the town; and changes to wording were also suggested by the Lee Valley Regional Park Authority. Other comments concerned the need for the expansion of retail and business concerns in Ware.

2.15 Summary of Issues - Chapter 9

- 2.15.1 Chapter 9 asked four questions in respect of options for the villages. Three types of village were identified: Larger Service Villages, Smaller Service Villages and Other Villages/Hamlets, although a new category of village was suggested, based on villages with railway stations (e.g. Stanstead Abbots and Watton-at-Stone), thereby offering sustainable travel options. It was also suggested that the Core Strategy should consider a development strategy that would allow a more nuanced approach to the level of development that each settlement is allocated, based more closely on the principles of sustainable development.

Question 39 - Approach to Development in the Villages

- 2.15.2 Rather than taking a blanket approach to development, it was considered that density should be determined on either a site by site or village by village basis, and that design should take precedence over any artificial notions of minimum density. Some respondents also suggested that communities should be allowed to decide what is most appropriate for their village.

Question 40 - Identifying Types of Villages

- 2.15.3 Whilst there was some support for identifying three types of villages, the key concern raised was that the approach is too general and that villages should be considered individually, having regard to access to services and sustainability criteria, not just size and range of facilities. It was suggested that consideration needs to be given to the potential of smaller villages/hamlets to

evolve through accommodating growth and thereby avoiding a 'sustainability trap'. The role of neighbourhood planning and community right to build was referred to.

Question 41 - Village Identification

- 2.15.4 The majority of respondents commented on whether a particular village had been correctly identified. The village attracting the most comments was Braughing (where it was felt that it had been incorrectly identified as a Larger Service Village). A number of other villages were suggested as either Smaller or Larger Service Villages. Several respondents felt that they could not comment on the Other Villages/Hamlets as these had not been specifically listed in the consultation document. It was also requested that the basis for identifying each village should be published. Whilst a number of respondents did not want to see any development in the villages, some respondents felt that each village should accommodate a small amount of development.

Question 42 - An emerging Vision for the Villages

- 2.15.5 Whilst there was some support for the emerging visions, a number of respondents felt that they were too broad-brush given that each village is unique, too cautious and lacking in imagination, and would not protect the character of villages. It was also suggested that the Larger Service Villages should each have their own vision, informed by local Parish Plans / Village Design Statements. The Environment Agency was concerned that there was no mention of flood risk in any of the visions.

2.16 Summary of Issues - Chapter 10

- 2.16.1 Chapter 10 dealt with the issue of development to the north of Harlow. Growth in this location was specifically identified in the East of England Plan, as being separate and in addition to growth for the rest of the district. As required by the East of England Plan, an appraisal of planning and transport options was required to be undertaken in order to inform the preparation of LDF documents. Consultants were engaged on behalf of East Herts, Epping Forest and Harlow Council's to undertake this technical work, paid for by Government Growth Area Funding (GAF).
- 2.16.2 The Stop Harlow North campaign (SHN) has been active in its opposition to development in this location and encouraged its supporters to respond to this consultation using standard response worded webform and postcard. **Essential Reference Paper F** is a screenshot of the Stop Harlow North Campaign webform which sets out six statements of objection. The vast

majority of respondents indicated their agreement to all of these statements, although a small number disagreed with point 5. It should also be noted that the developer with an interest in land to the north of Harlow (Harlow North Joint Venture (HNJV)) sent leaflets to households across East Herts promoting the benefits of development to the north of Harlow to meet all of East Herts needs. For information, copies of the HNJV and SHN leaflets are attached as **Essential Reference Papers C and D**, respectively.

- 2.16.3 There were two parts to Question 43 and the responses to these are set out below. Part a. asked whether respondents agreed with the consultants suggested approach and Part b. asked, in light of the impending abolition of the East of England Plan, if development to the north of Harlow was no longer required by the East of England Plan, should this location be considered to meet some of East Herts District requirement.

Question 43a - North of Harlow Consultants Suggested Approach

- 2.16.4 Many detailed arguments for and against development north of Harlow were made, several of which covered points discussed at the Regional Plan Examination in Public in 2006. Most support for the proposals came from those living further away. It was also pointed out that development north of Harlow would assist with the Government's agendas for higher rates of house building and for growth and investment in East Herts as well as Harlow.
- 2.16.5 Concerns were raised about how the proposed development would integrate with Harlow; the deliverability of infrastructure and new jobs; water resources; traffic congestion (particularly on the A414, A1184 and in the villages); loss of Green Belt land; and about the impact on the character of the villages and the countryside. There were differing opinions on the effect of development north of Harlow on other East Herts towns and villages, and also differing opinions on the sustainability benefits of large-scale development generally.
- 2.16.6 Respondents also questioned the fit with the localism agenda and suggested that since the Government has announced its intention to abolish the RSS, Policy HA1 is now irrelevant. Several respondents pointed out that, without the RSS in place, Option C as set out in the Consultants' study (which did not include development to the north of Harlow) would form the Consultants' Suggested Approach.

Question 43b - North of Harlow District-wide Requirement

- 2.16.7 It was argued by some respondents that with the demise of the East of England Plan, the area north of Harlow potentially offers an opportunity for East Herts Council to locate all 8,500 dwellings to 2031. This could have the advantages of: a) preserving the towns and villages elsewhere in the district, b) reducing risk of non-delivery inherent in multiple small sites c) facilitating infrastructure delivery more effectively than would be possible through incremental growth at numerous locations d) and contributing to the important sub-regional role of Harlow in the London Arc.
- 2.16.8 On the other hand, respondents commented that a large development north of Harlow would: a) damage the character of the District and local villages if it became the area became a 'sink' for the District housing requirement b) would be impossible to fund the infrastructure requirements of what is effectively a new settlement c) the lack of barriers to development north of Harlow would effectively entail loss of control over development for generations to come and d) it does nothing to meet local needs or wishes.
- 2.16.9 It was argued that whilst there is no definable outer limit to development until the A120 is reached, a northern relief road/M11 link could provide a northern boundary to the development. Respondents also commented that smaller-scale development north of the Stort would relate better to Harlow and cause less damage to the countryside and character of the district.

2.17 What Happens Next?

- 2.17.1 The next stage of the Core Strategy is called the Preferred Options and is essentially the Council's draft plan for the district. The issues raised to the Issues and Options consultation that have been summarised in this report will be used to inform the Preferred Options.
- 2.17.2 Further information on the methodology for preparing the Preferred Options Project Plan is set out in **Agenda Item 7**. Importantly, the Preferred Options Project Plan will set out the further technical assessments that need to be undertaken as part of the preparation of the Core Strategy. As explained in Section 2.5 of this report, this will include further technical work in respect of the District housing requirement.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper A**.

Background Papers

Local Development Framework Executive Panel 27th May 2010 -
Agenda Item 5: LDF Core Strategy Issues and Options Consultation
Document (May 2010)

<http://www.eastherts.gov.uk/index.jsp?articleid=13789>

Contact Member: Councillor M G Carver, Executive Member for
Planning Policy and Economic Development

Contact Officer: Kevin Steptoe, Head of Planning and Building
Control - Ext 1407

Report Author: John Careford, Senior Planning Policy Officer

ESSENTIAL REFERENCE PAPER 'A'

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>Pride in East Herts <i>Improve standards of the built environment and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
Consultation:	Consultation with the community and stakeholders is a key requirement of DPD preparation. Issues and Options consultation was the first formal stage of ongoing engagement. The Preferred Options stage will involve statutory public consultation.
Legal:	It is a statutory duty under the Planning and Compulsory Purchase Act 2004 for East Herts Council as the local planning authority to produce and keep up-to-date sound and robust Development Plan for the district. The Core Strategy will become the key document in the Development Plan.
Financial:	The preparation of the Core Strategy is being funded from the Planning Policy / LDF Upkeep Budgets, which includes covering the costs of various stages of public consultation and independent examination.
Human Resource:	Existing Planning Policy staff resources will continue to manage the preparation of the Core Strategy.
Risk Management:	<p>Failure to consult with the community and stakeholders and demonstrate how their views have informed the preparation of the Core Strategy could result in the Core Strategy being found unsound or not fit for purpose at independent examination.</p> <p>In order to be found sound the Core Strategy should be based on technical evidence and the views of the community and stakeholders.</p>

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ESSENTIAL REFERENCE PAPER 'B': SUMMARY OF CONSULTATION

Meetings and Events
LDF Executive Panel (27 th May)
Rural Conference (10 th June)
Town and Parish Council Issues and Options Introductory Sessions (26 th and 29 th July)
<p>Community Voice Meetings:</p> <ul style="list-style-type: none"> • Hertford (2nd Sept) • Sawbridgeworth (9th Sept) • Buntingford (13th Sept) • Bishop's Stortford (16th Sept) • Ware (7th Oct)
<p>Town Council Engagement Sessions:</p> <ul style="list-style-type: none"> • Ware Town Council (29th Sept) • Buntingford Town Council (12th Oct) • Hertford Town Council (18th Oct) • Sawbridgeworth Town Council (25th Oct) • Bishop's Stortford Town Council (3rd Nov & 15th Nov)
<p>Parish Council Engagement Sessions:</p> <ul style="list-style-type: none"> • Southeast Parishes (27th Sept) • Western Parishes 1 (30th Sept) • Little Hadham Parish (5th Oct) • Western Parishes 2 (19th Oct) • Stanstead Abbots Parish (21st Oct) • Central Parishes (28th Oct)
<p>Civic Society Engagement Sessions:</p> <ul style="list-style-type: none"> • Bishop's Stortford Civic Federation (8th & 15th Sept) • Buntingford Civic Society (21st Sept & 13th Oct) • Hertford Civic Society (28th Sept) • Ware Society (14th Oct)
Bishop's Stortford Means Business (20 th Oct)
East Herts Youth Conference (26 th Oct)

Publicity and Press Articles
Feature article on East Herts Council Website homepage including News Banner
Extensive local press coverage
Article sent to parishes for inclusion in their magazines and websites
Article in East Herts Council's Autumn LINK Magazine delivered to households (Sept 2010)

Notification
All consultees on the East Herts LDF Database notified, including town and parish councils, and civic societies
Consultation documents sent to key stakeholders including Hertfordshire County Council, East Herts town and parish councils, and civic societies

Availability of Documents
Summary Leaflet distributed to households and some businesses and available at: <ul style="list-style-type: none"> • District Council offices in Hertford and Bishop's Stortford • Town Council offices • Public Libraries • Council run Leisure Centres
Additional copies of Summary Leaflet available upon request from the Planning Policy Team
Consultation documents available online, for purchase, and at the following locations: <ul style="list-style-type: none"> • District Council offices in Hertford and Bishop's Stortford • Town Council offices • Public Libraries



NorthHarlow

Protecting quality of life

Empowering local
communities

Protecting
quality of life

East Hertfordshire District Council is currently consulting on options for the growth of the district. Following the removal of regional housing targets, by the Coalition Government, the Council has the opportunity to review with its residents, where the most appropriate locations for new development may be.

Development to the north of Harlow has the capacity to meet all of the district's housing needs to the year 2031, allowing other areas of the district to avoid the need to deliver housing development for the foreseeable future.



Protecting quality of life

A long term objective of the Council has been to protect the quality of life for its residents whilst at the same time, balancing the future needs of the communities it serves. However, the Council's consultation document is clear that due to limited capacity within existing urban areas it is likely that significant greenfield development beyond existing town settlement boundaries will be required. The development of North Harlow offers a deliverable way of achieving the required housing numbers, as well as providing the major investment and improvement in the quality of services that future communities will require.

We know that public sector funding for much needed infrastructure investment will be constrained for many years to come. We also know that for families struggling to find a new home that they can afford, or young people trying to get their first foot on the property ladder, new solutions to delivering housing are needed.

A comprehensive development that focuses and controls growth in one location would generate significant funds for local services and infrastructure, as well as providing much needed new homes. It can also assist the regeneration of Harlow itself, bringing new jobs and investment into the region.

HNJV has, for the last year, been asking local people for their thoughts, concerns and ideas for our landholding to the north of Harlow. We have used this to shape our thoughts on our draft masterplan and to directly inform our forthcoming submissions to East Hertfordshire and Harlow Councils for their Local Development Frameworks. We would now like to share this with you.



1 Ardeley Village Green



2 The Ford at Braughing



3 The River Lea, Ware



4 Hertford Town Centre



Photographs
1 © Copyright Martin Addison. 2 © Copyright Christine Matthews. 3 © Copyright Robert Edwards. 4 © Copyright Roger Geach. All photos above are licensed for reuse under the Creative Commons Licence.

Empowering local communities

We are therefore looking at ways to involve the community in both planning and building North Harlow, through, for example, transferring land to community ownership, and enabling legally binding agreements which give local people a stake in the development.

This would give existing and future communities direct control of what happens in their neighbourhoods. It would also allow local people themselves to achieve those locally supported ambitions set out in the Eastwick and Gilston Parish Plan, prepared by the Parish Council or the proposals for Great Gilston Park, worked up by members of the local community. And it would allow residents to shape their relationship with North Harlow, particularly in sensitive areas between existing villages and new homes. It would ensure that the distinctive identity of each village could be maintained in perpetuity for the benefit of future generations.

We recognise from our consultation that the open spaces and green character of the area, and how they are maintained, are as important as the areas where development could occur. In fact they are vital to the success of the new place. Our emerging masterplan, shown here at its simplest, identifies where development may be appropriate. It is the result of active community dialogue and rigorous analysis of the constraints and opportunities of the locality.

The open spaces and green character of the area are vital to the success of the new place.



Empowering local communities

The new Government is changing the way the planning system works to put local people at the heart of decision making but also to ensure that the new homes and facilities that are required by our growing population will be built.

HNJV has asked people in East Hertfordshire their views and you have said that you want the character of existing towns and villages to be protected. But you also recognise the need for new homes, and providing choice and affordable homes for local families has been one of the priorities of your local authority.

Continuing the conversation

HNJV is a joint venture company comprised of Places for People and Land Securities. It remains committed to continuing our discussions with local people as we prepare our representations to the council's consultation process.

We will be holding exhibitions in East Hertfordshire and Harlow as follows:

Harvey Centre, Harlow, 11am to 4pm
Saturday 11th September 2010

Manor of Groves Hotel, High Wych, Sawbridgeworth, 11am to 8pm
Tuesday 14th September 2010

We want to listen to, and understand, your concerns but also demonstrate some of the many benefits our proposed investment can bring to help you make the most informed choice for the future of East Hertfordshire.

For further information or to comment on our emerging proposals please contact us at:

www.northharlow.com

0845 6048387

enquiries@northharlow.com

North Harlow
FREEPOST HNJV



We need you to
respond
again!

STOP HARLOW NORTH

Public consultation on
East Herts
Local Development Framework
**Speak up to protect
your countryside**



SAY NO NOW www.stopharlownorth.com

PLEASE RESPOND TODAY

Why do I need to respond again?

Good news – the new Government has revoked the East of England Plan.
Bad news - Developers and others are still suggesting the green fields north of Harlow are a suitable place to build thousands of homes.

East Herts Council has to prepare a Local Development Framework (Local Plan) to guide development for the district. The Council wants to hear residents' views before formulating the preferred options for housing in the district.

We need to give East Herts Council clear evidence that residents do not want major building on the green fields north of Harlow

What do I need to do?

You need to **respond to Q43 in the consultation**, saying you:

- **object to building thousands of houses in the countryside north of Harlow and the planned loss of Green Belt**
- **support your local parish councils' view that the land should remain actively used countryside, with access for all, as described in our Gilston Great Park proposals**

There are many more questions in the Issues and Options Consultation relating to development across the whole district. If you want to make a fuller response please go to the Council's website to view the full consultation

How can I comment?

1. Simply detach the attached postcard, fill in your name and address and post it back to East Herts Council (FREEPOST) – **No stamp required!**
or
2. Complete the form on our website www.stopharlownorth.com
or
3. Write directly to: East Herts Council, Issues and Options Consultation, Planning Policy Team, FREEPOST ANG6624, Pegs Lane, Hertford, Herts SG13 8YS or log on to www.eastherts.gov.uk
responses must be received no later than 5pm on 25th Nov 2010

Will it make a difference?

Over the many years of the campaign public support has been instrumental in achieving our goals. The number of individual responses the Councils receive will make a significant impact. Everyone in your household should respond.

Make sure your voice is heard before Nov 25th

Published and distributed by STOP Harlow North



East Herts Core Strategy Issues and Options Consultation:

Statistical analysis of consultation responses

Contents

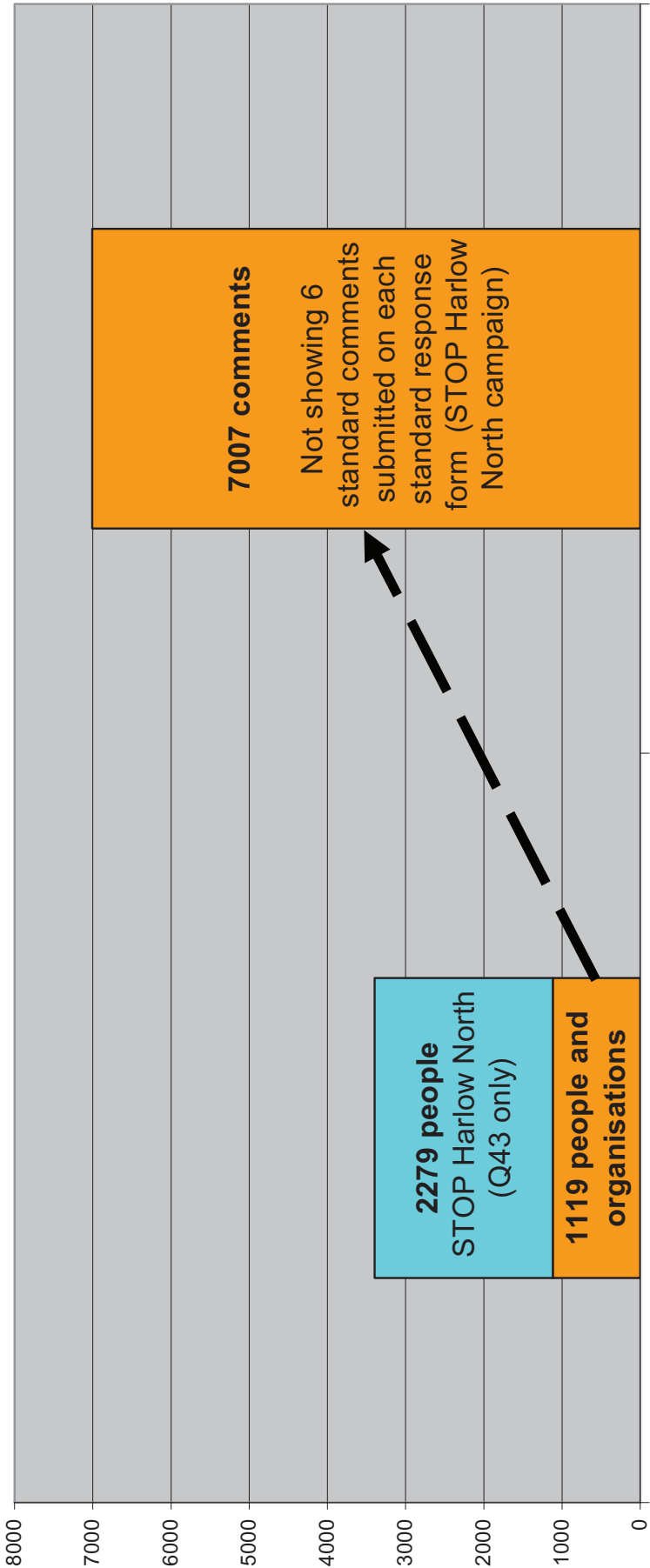
Part I	Analysis of overall response	Page 3
Part II	Demographic analysis	Page 11
Part III	Analysis by consultation question number	Page 17

Part I

Analysis of overall response

Overall response

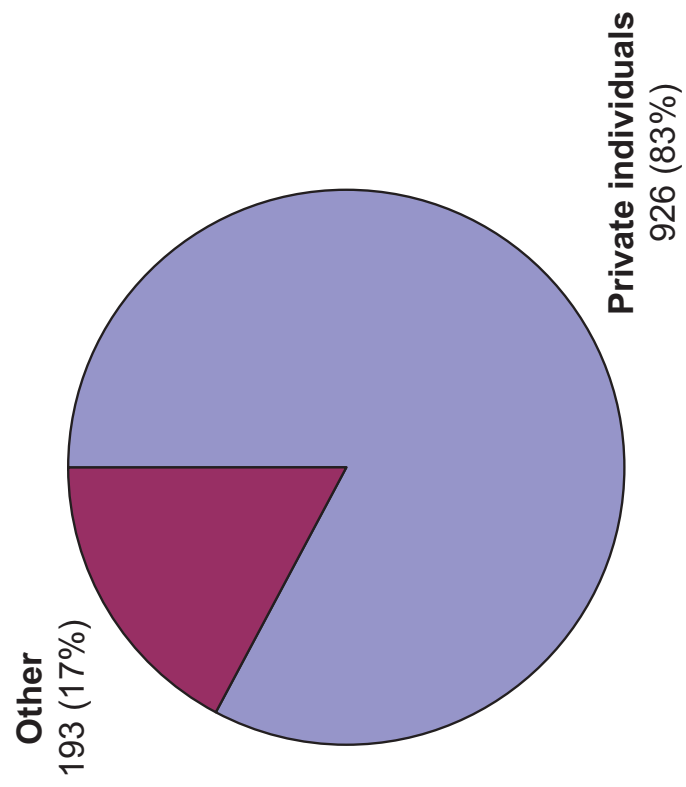
- STOP Harlow North responses - standard postcards, newspaper coupons, web form (Q43 only)
- Summary Leaflets, Web responses, Questionnaires, emails, letters



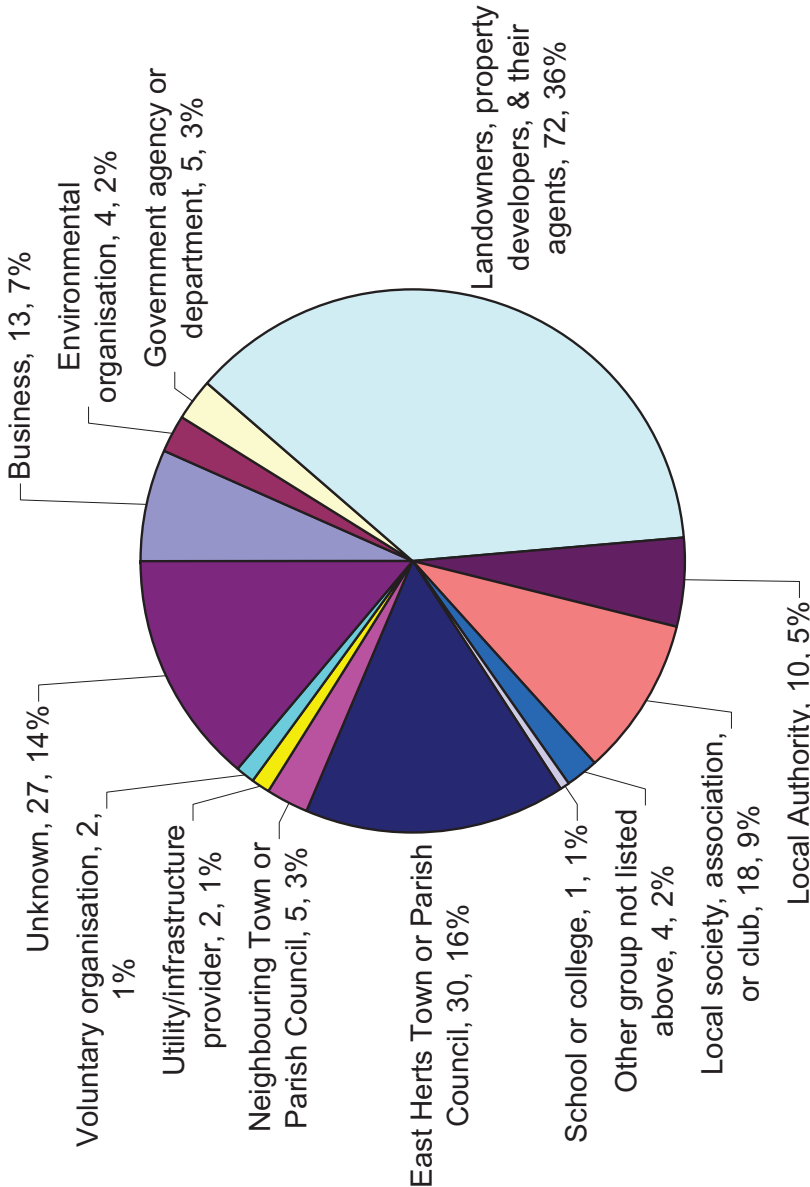
A: People and organisations responding

B: Comments made by those shown in A

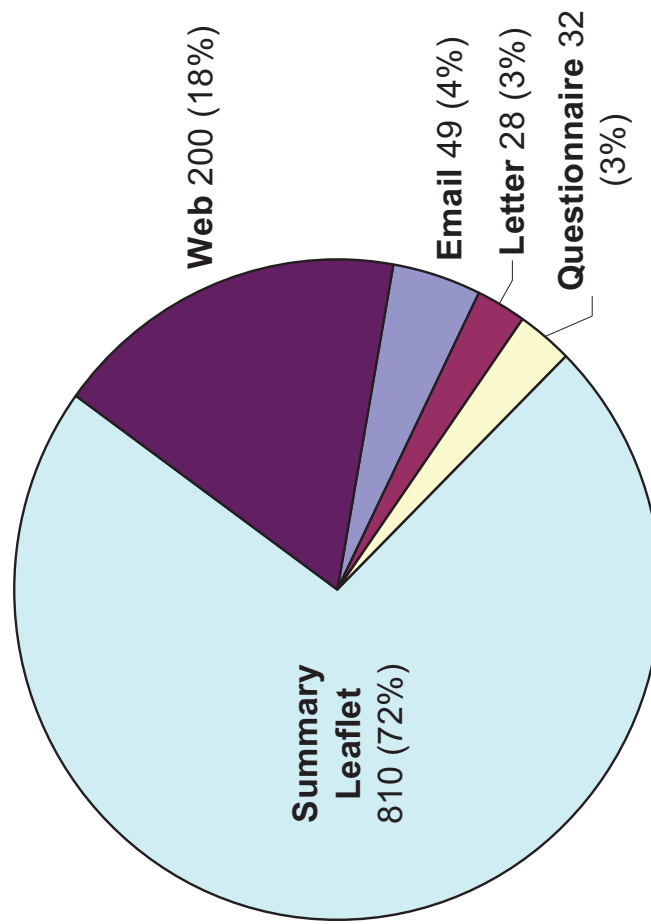
Total response showing private individuals and others
(of 1119 people and organisations)



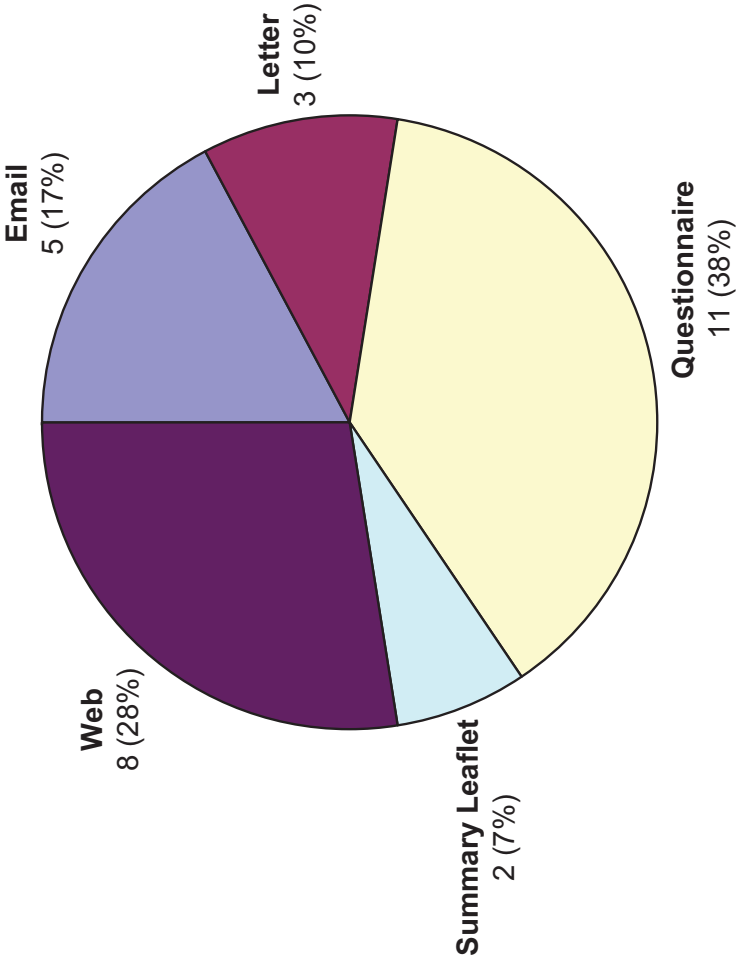
Response by type (i.e. 193 'other') - excluding private individuals



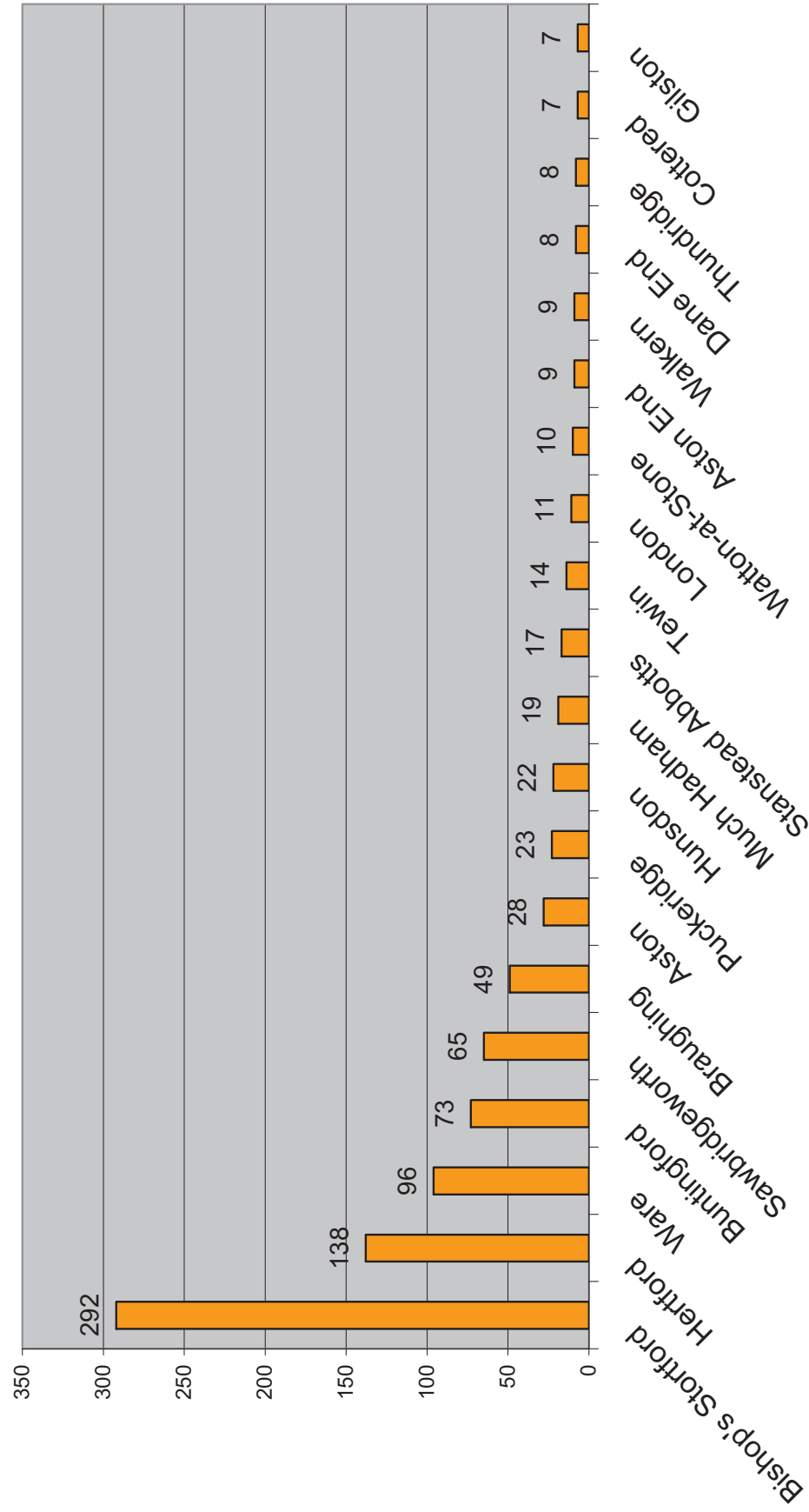
Responses by source - for 1119 people and organisations
(See Q43 analysis for STOP Harlow North responses pertaining to that question only)



East Herts Town and Parish Councils - response by source



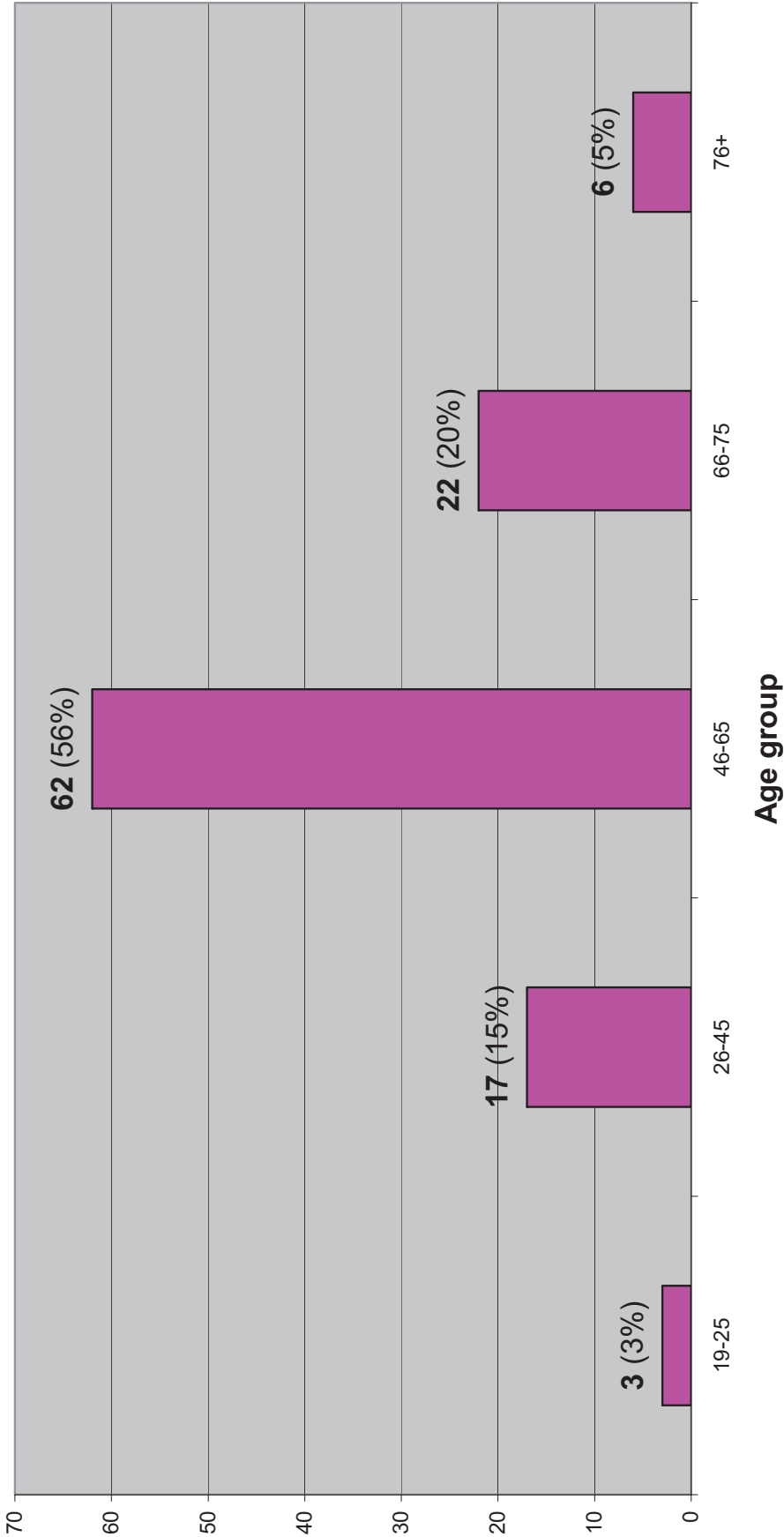
Respondents by Settlement - top 20 by point of origin



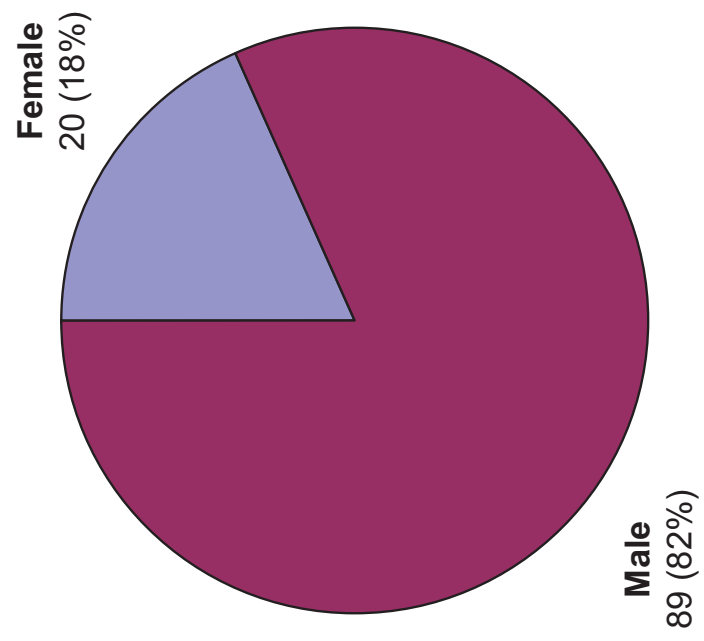
PART II

DEMOGRAPHIC ANALYSIS

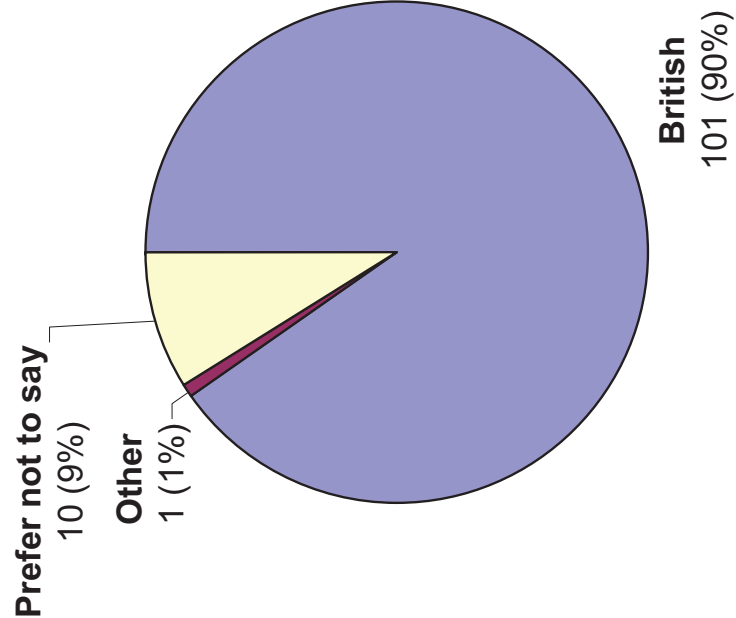
To which age group do you belong?
(of 110 responses)



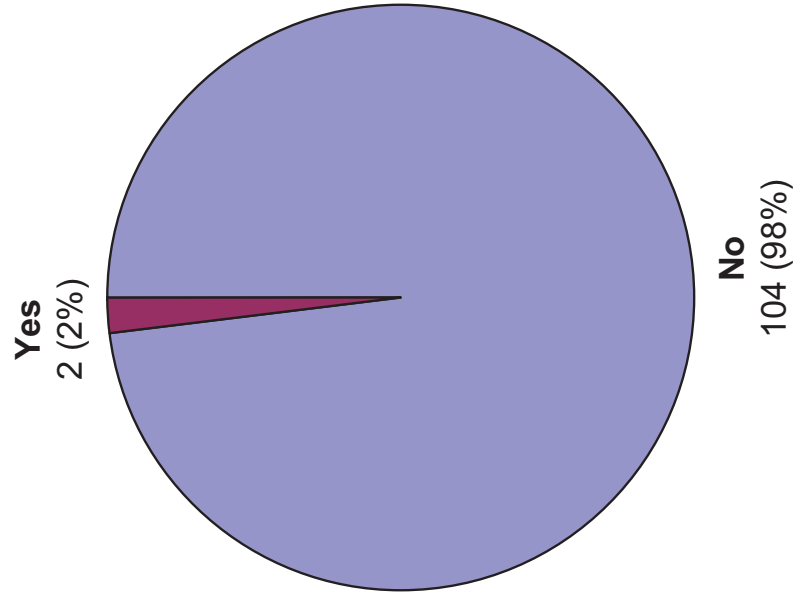
Are you male or female?



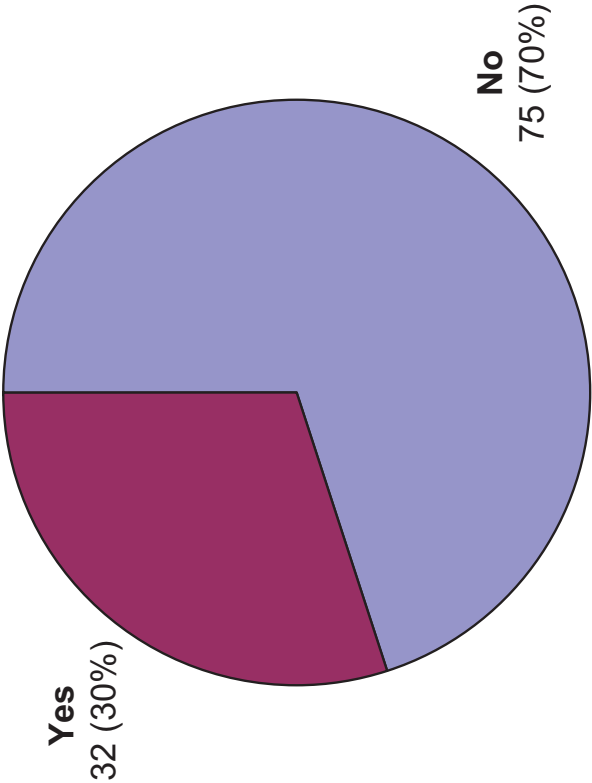
How would you describe your race/ethnicity?



Do you consider yourself to have a disability?



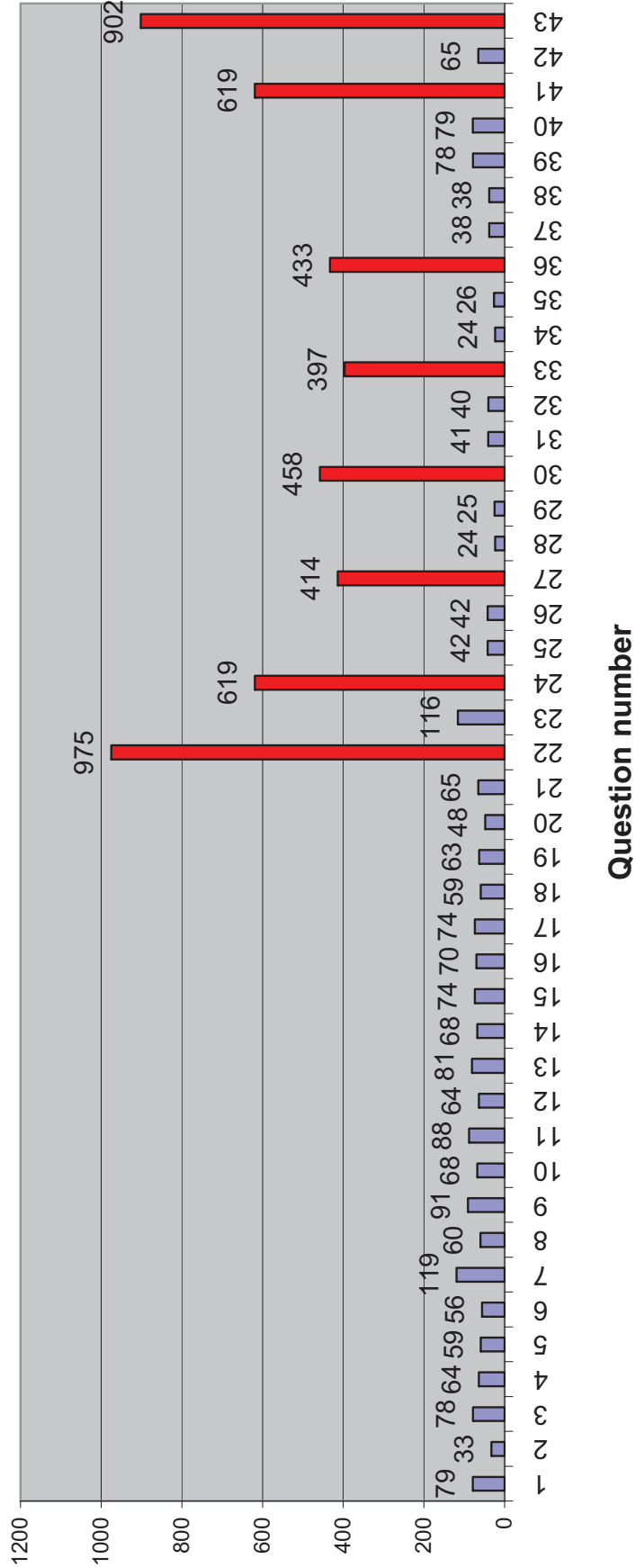
Do you work in East Herts?



PART III

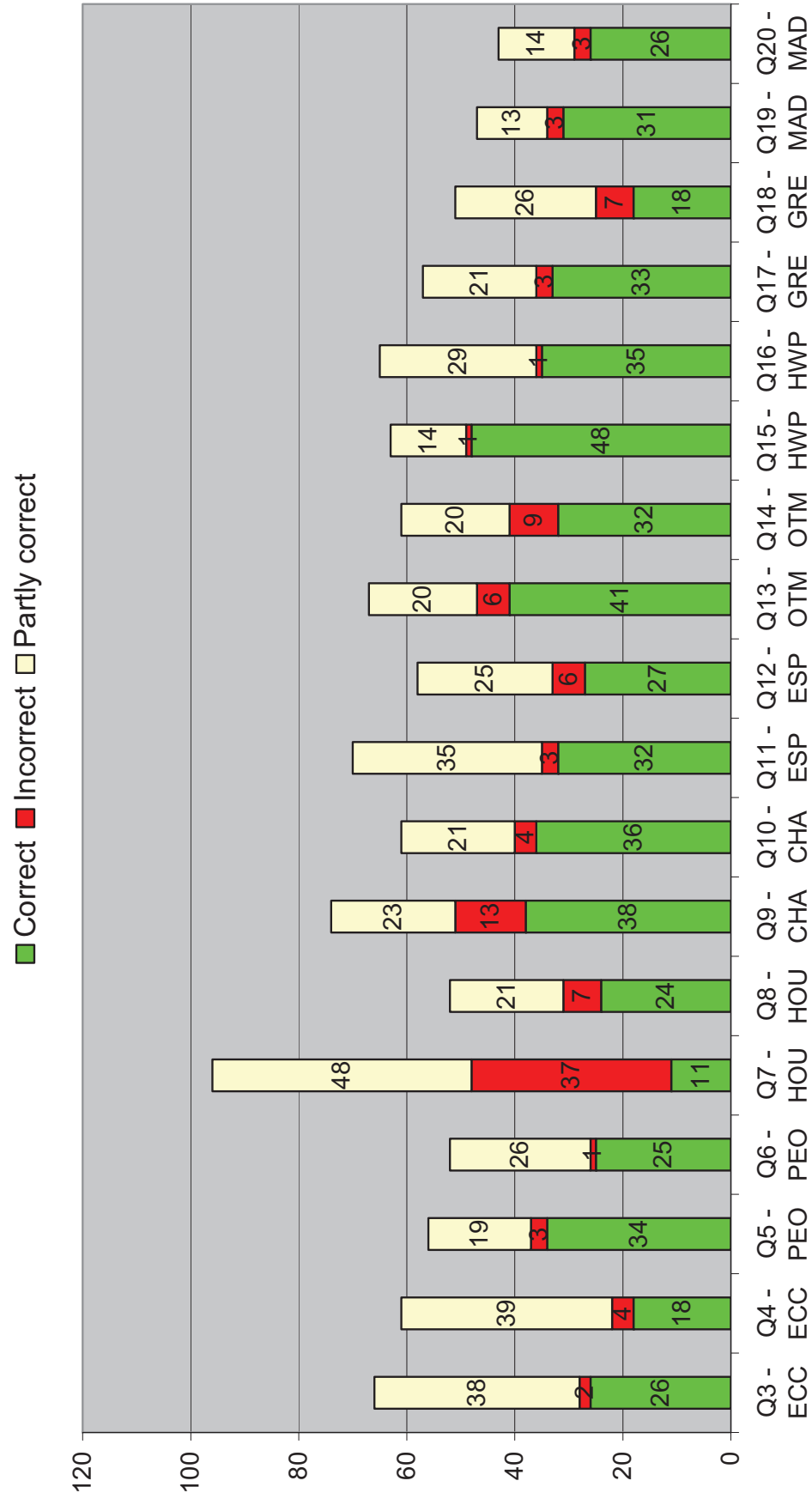
ANALYSIS BY CONSULTATION QUESTION NUMBER

Total responses by question



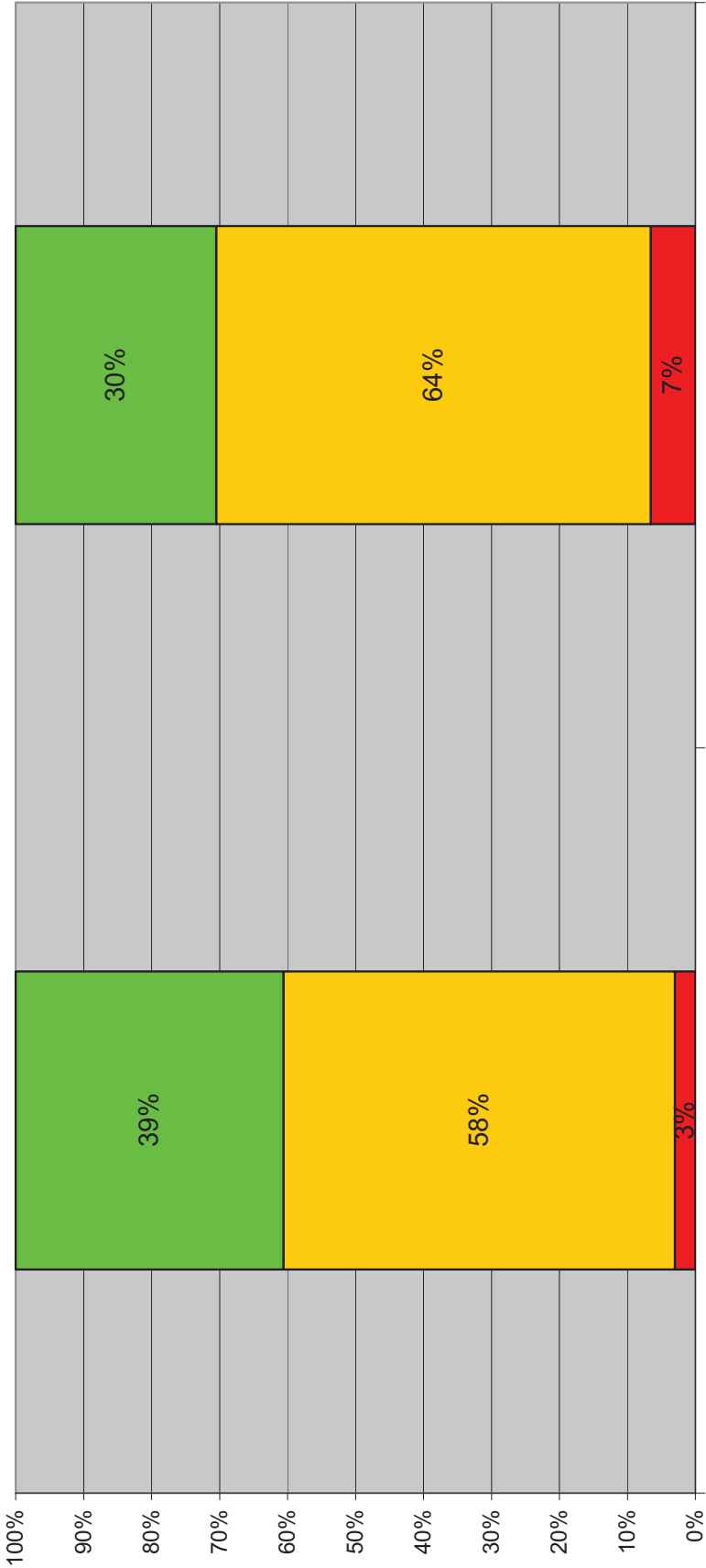
Items highlighted in red denote questions included on the Summary Leaflet mailed to households and businesses

Comments on Strategic Objectives and Policy Options by Theme



Theme 1: East Herts Energy and Climate Change

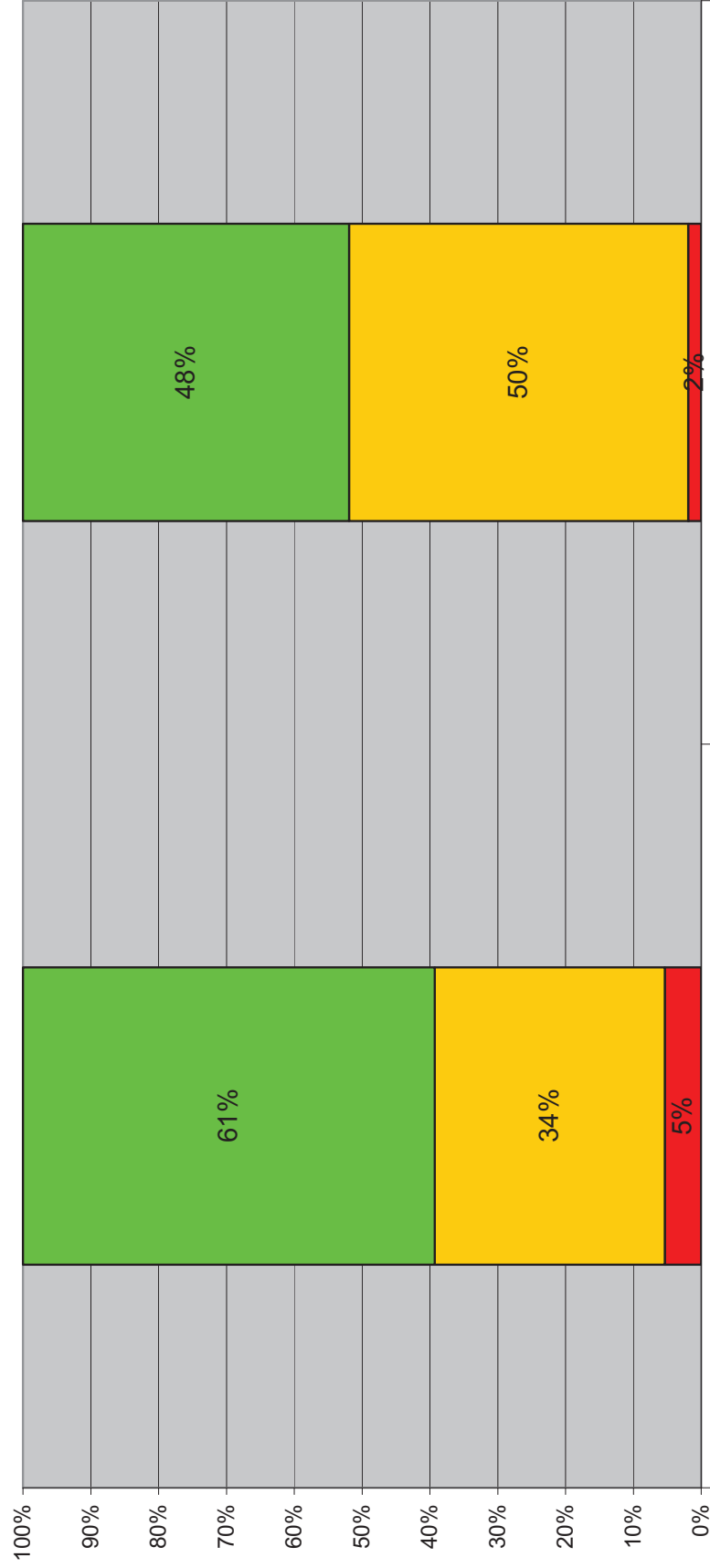
Incorrect Partly correct Correct



Question 3 - Have we got the strategic objectives correct? Question 4 - Have we got the policy options correct?

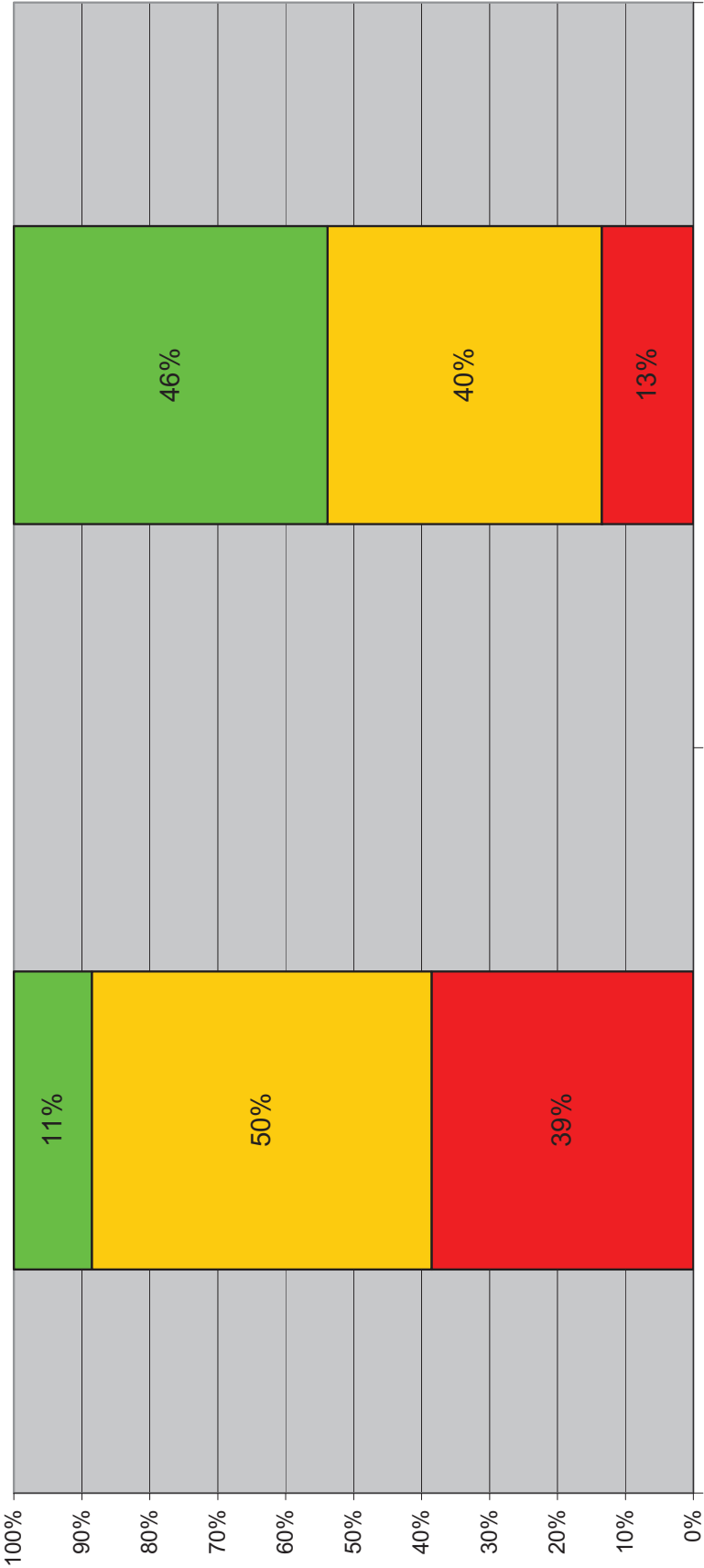
Theme 2: East Herts People and Community Safety

■ Incorrect ■ Partly correct ■ Correct



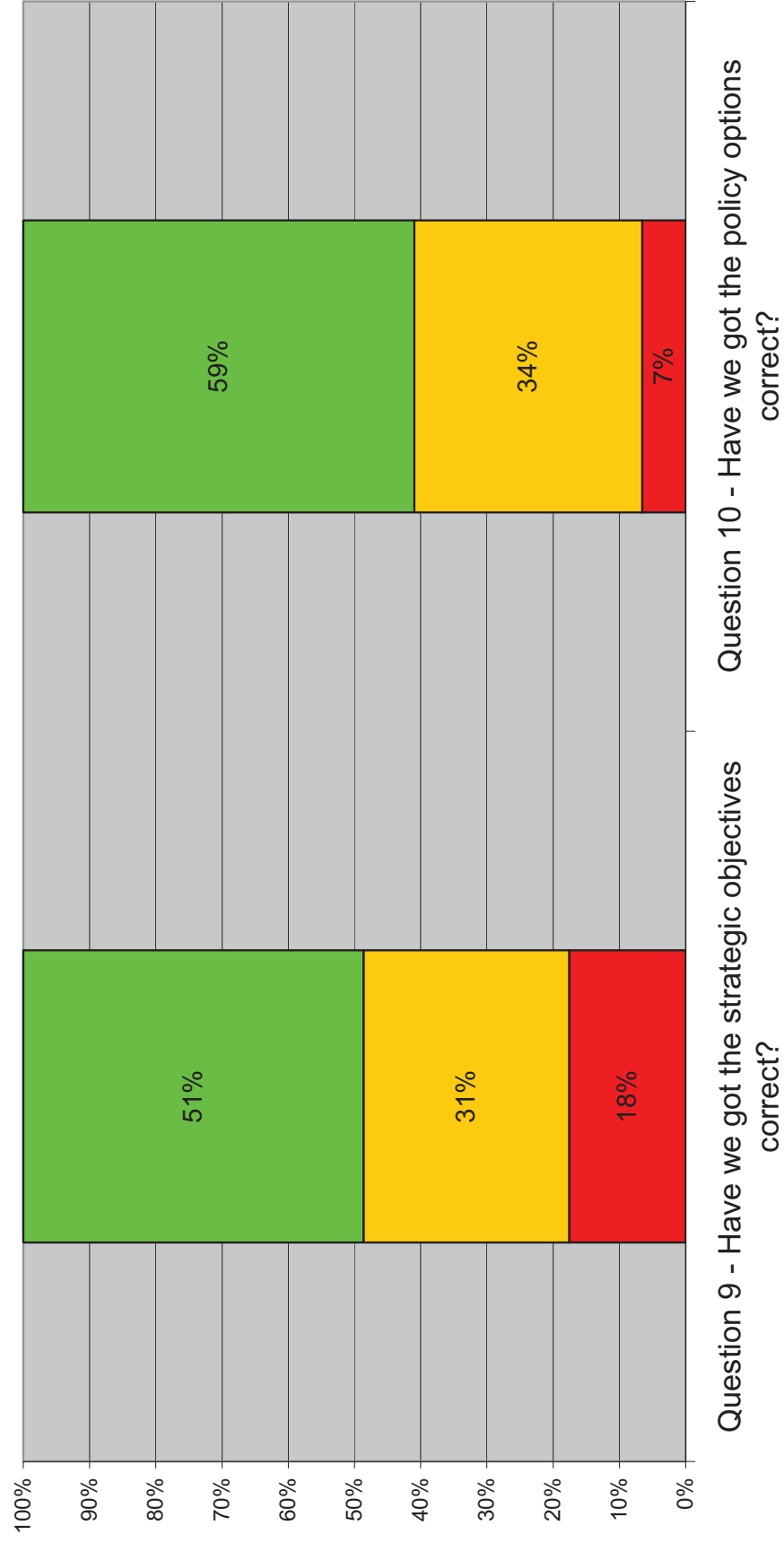
Theme 3: Housing East Herts

Incorrect Partly correct Correct



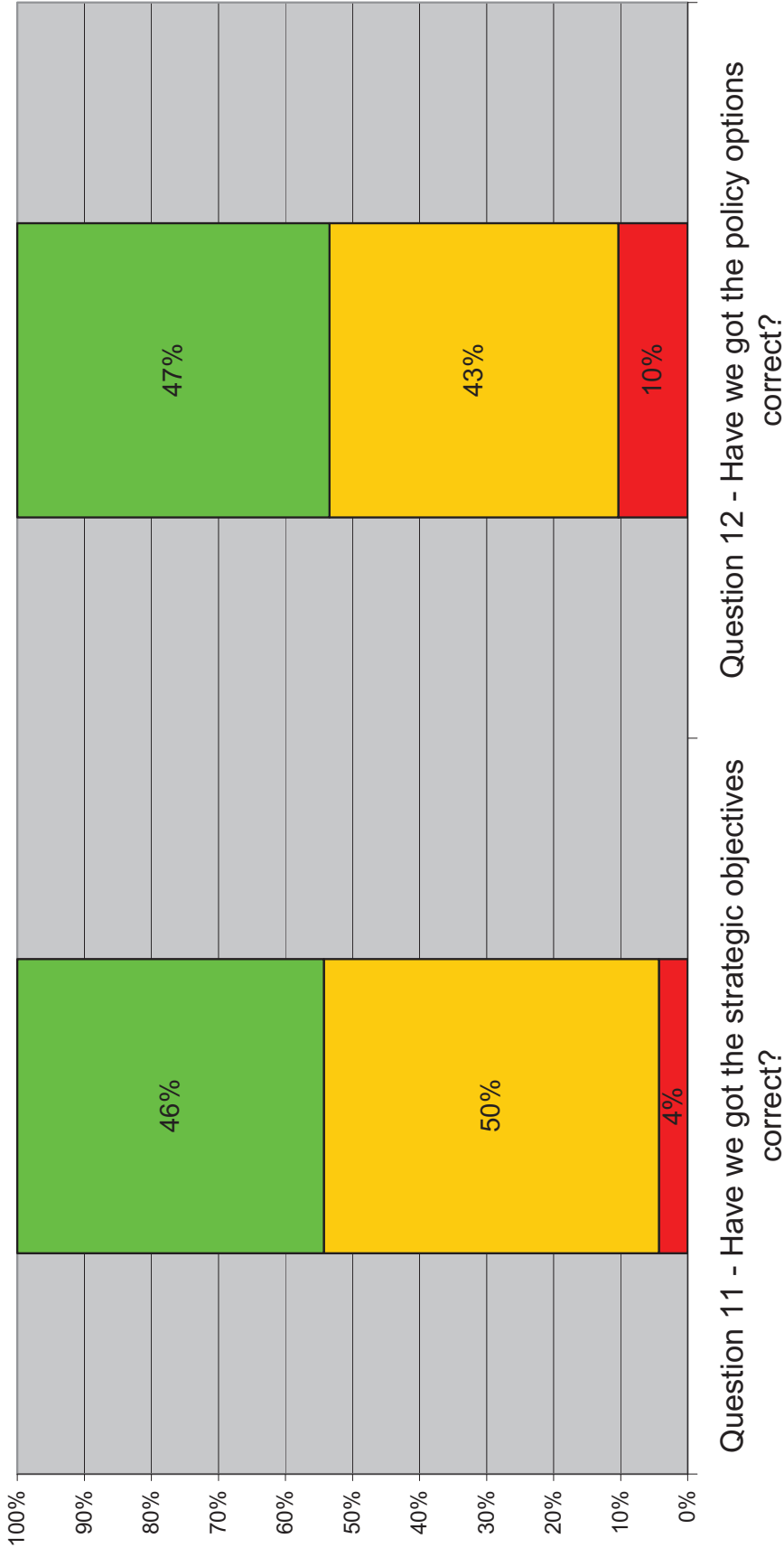
Theme 4: East Herts Character

■ Incorrect ■ Partly correct ■ Correct



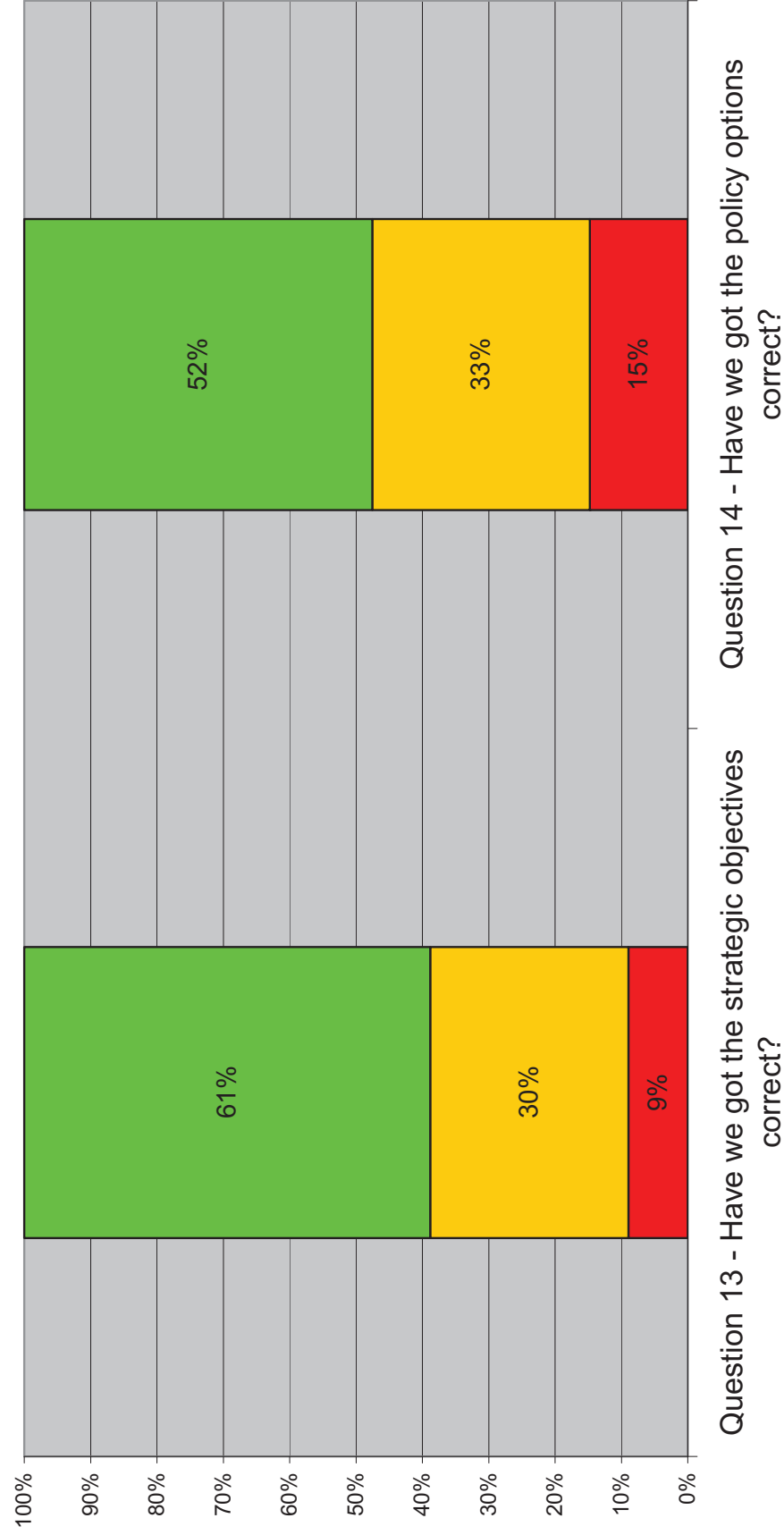
Theme 5: East Herts Economy, Skills and Prosperity

Incorrect Partly correct Correct



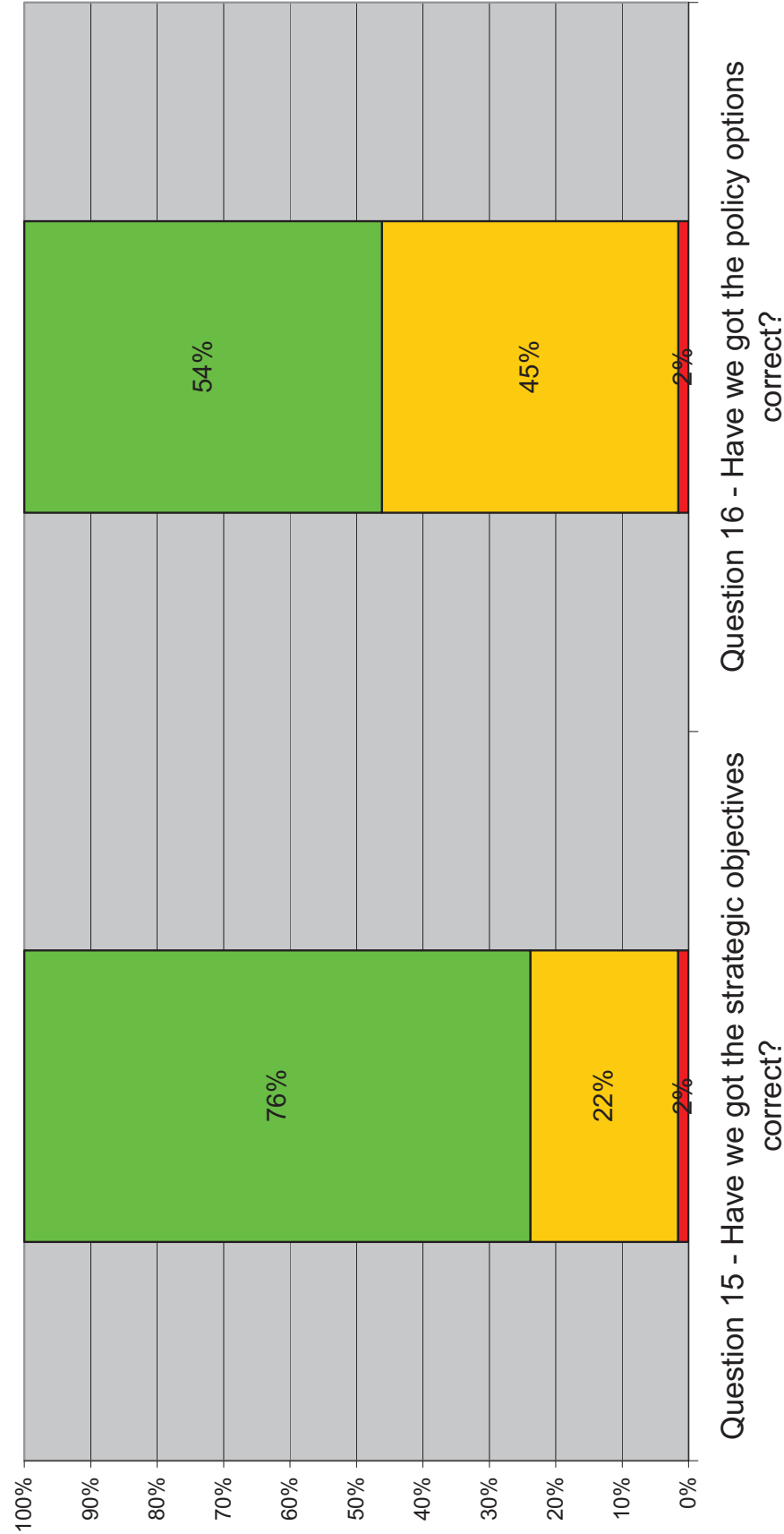
Theme 6: East Herts On The Move

■ Incorrect ■ Partly correct ■ Correct



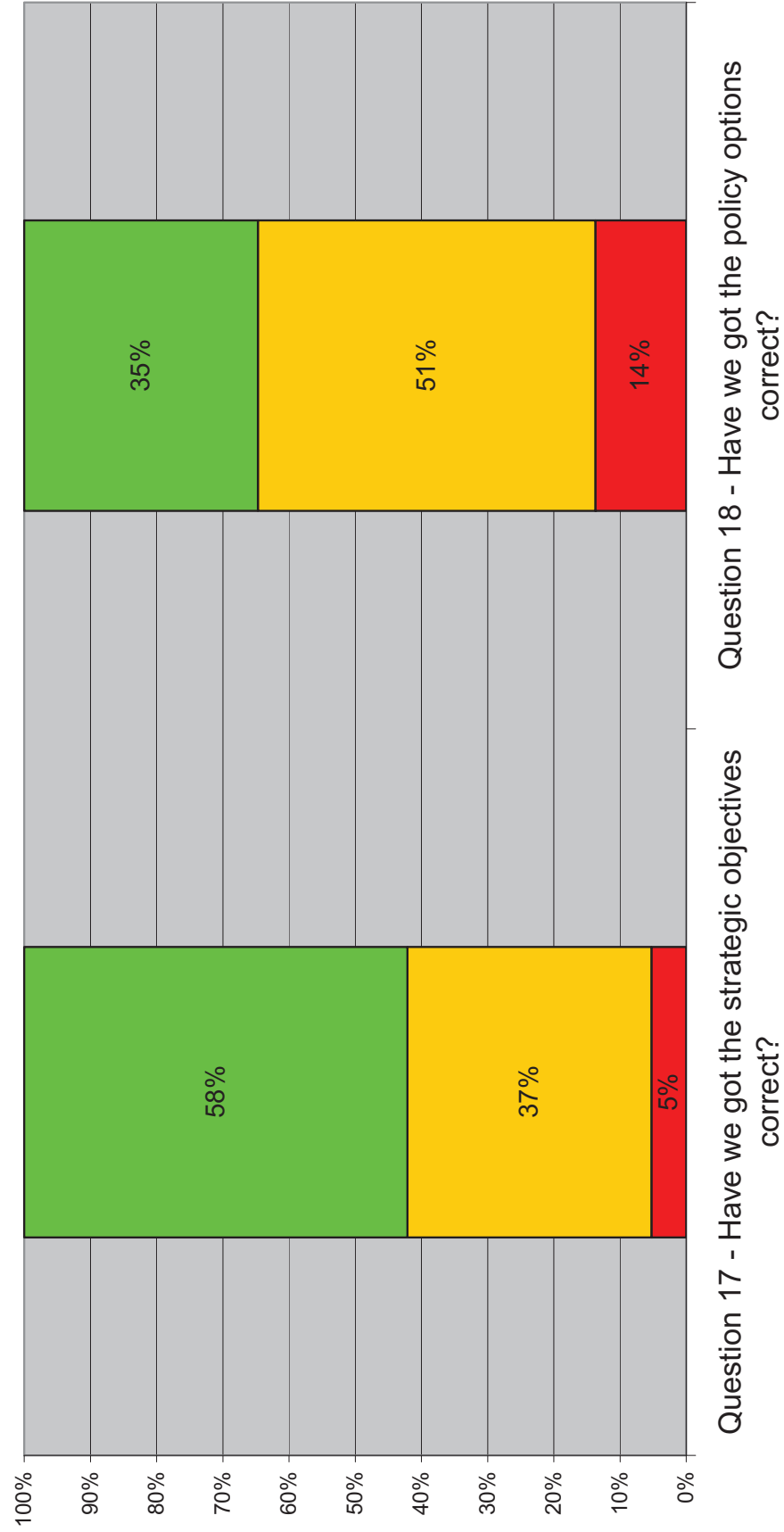
Theme 7: East Herts Health, Wellbeing and Play

Incorrect Partly correct Correct



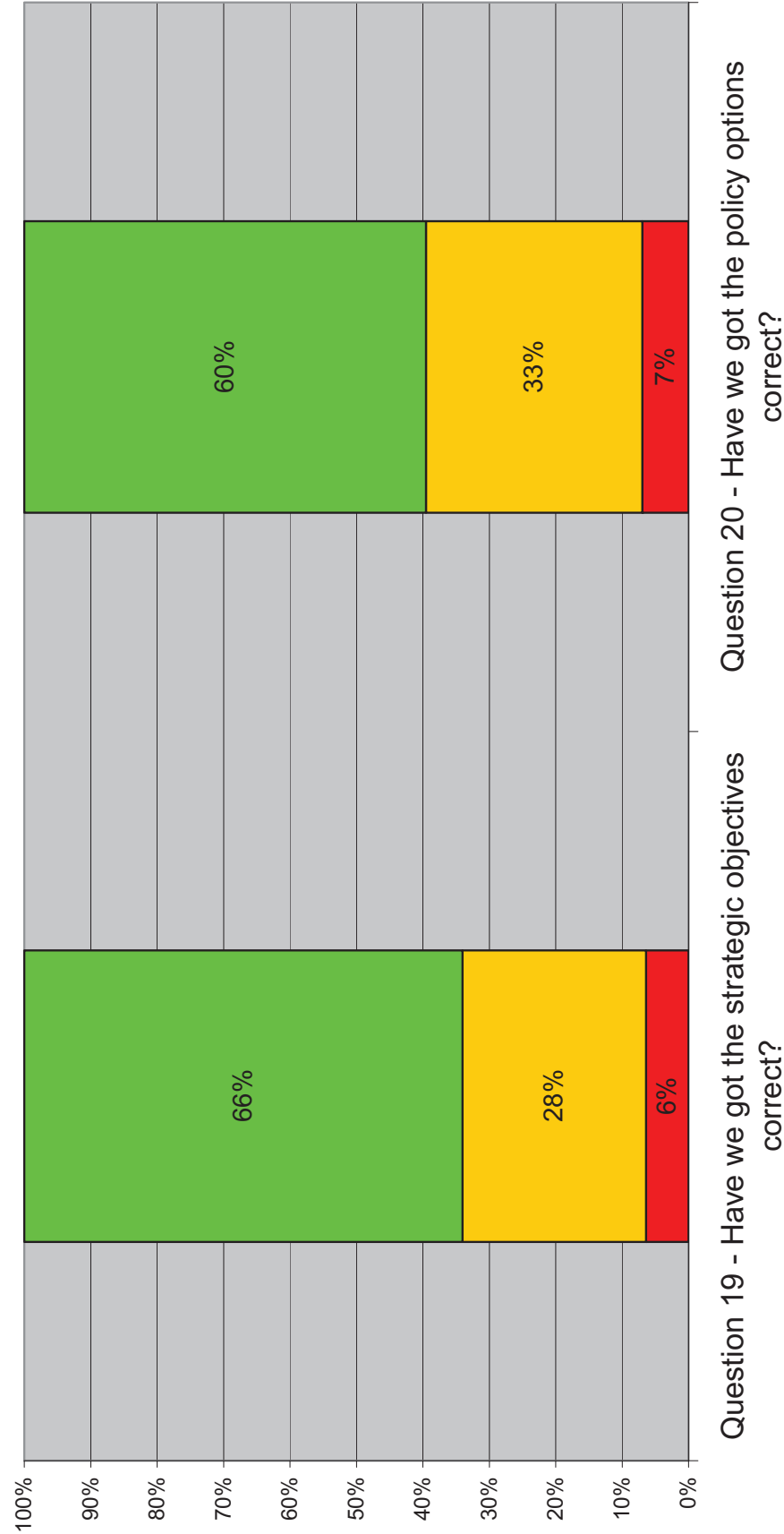
Theme 8: Green East Herts

■ Incorrect ■ Partly correct ■ Correct

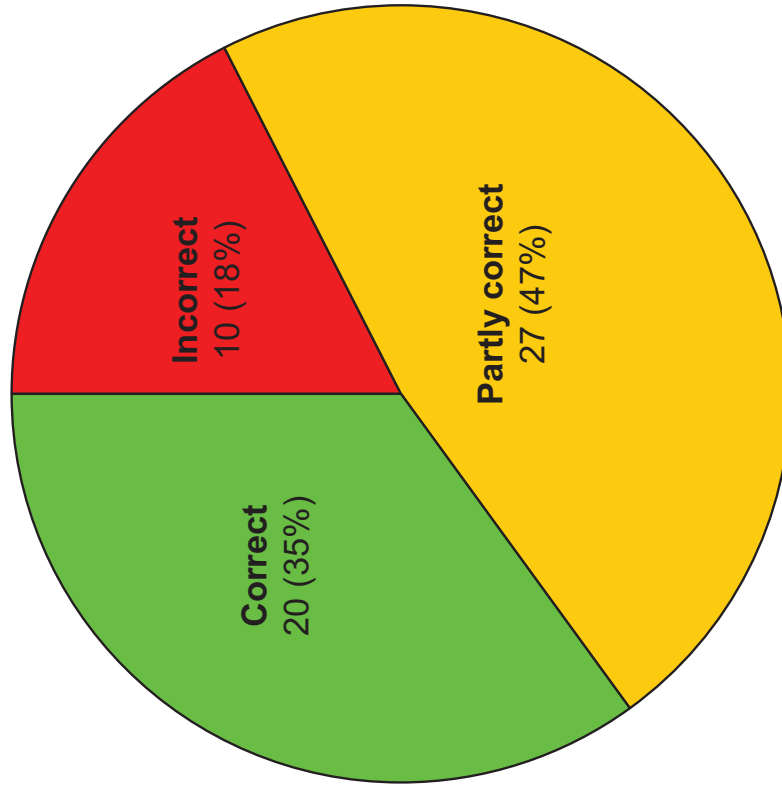


Theme 9: East Herts Monitoring and Delivery

Incorrect Partly correct Correct

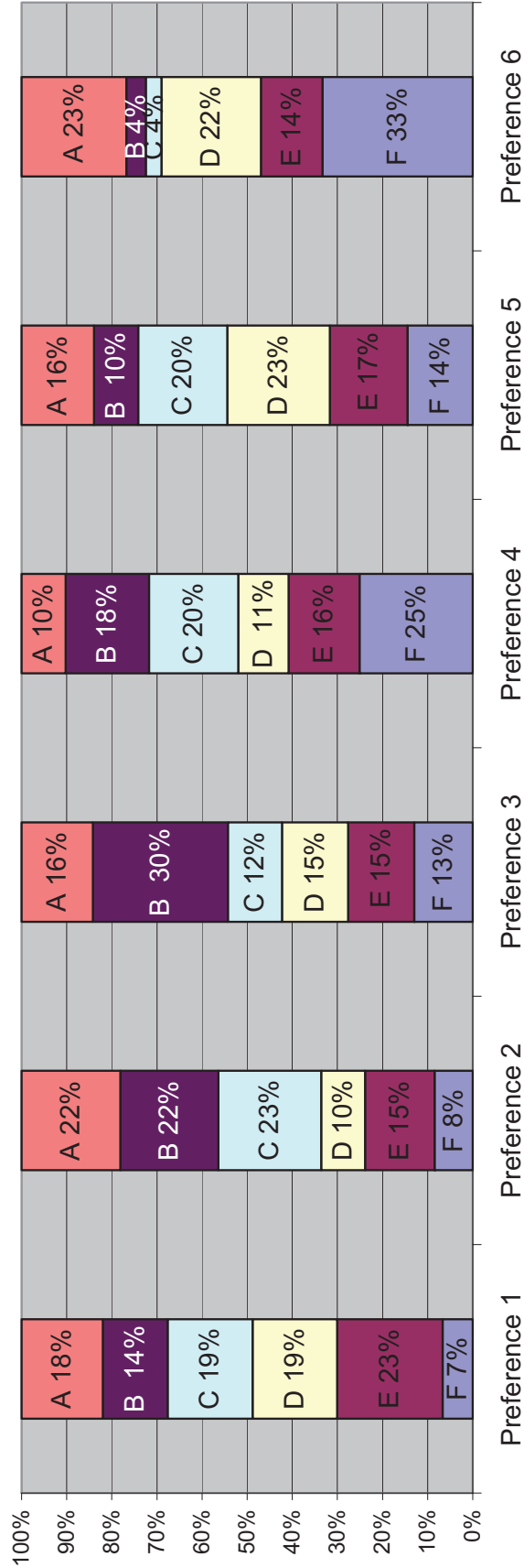


**Q21 - is our emerging LDF vision
for what East Herts will be like in 2031 correct?**

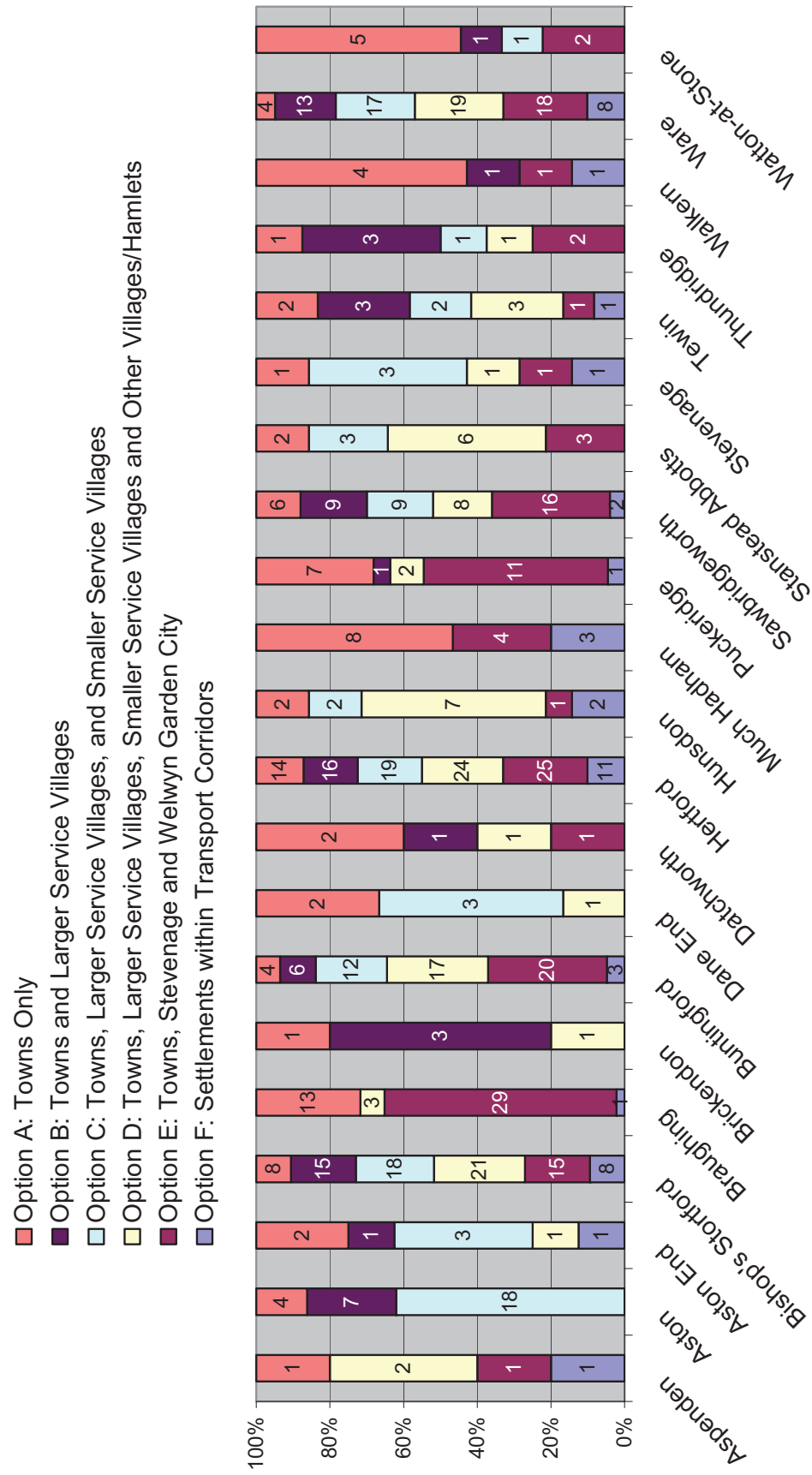


Q22 - Which development strategy do you think is the most appropriate to meet the challenges facing East Herts and achieve sustainable development?

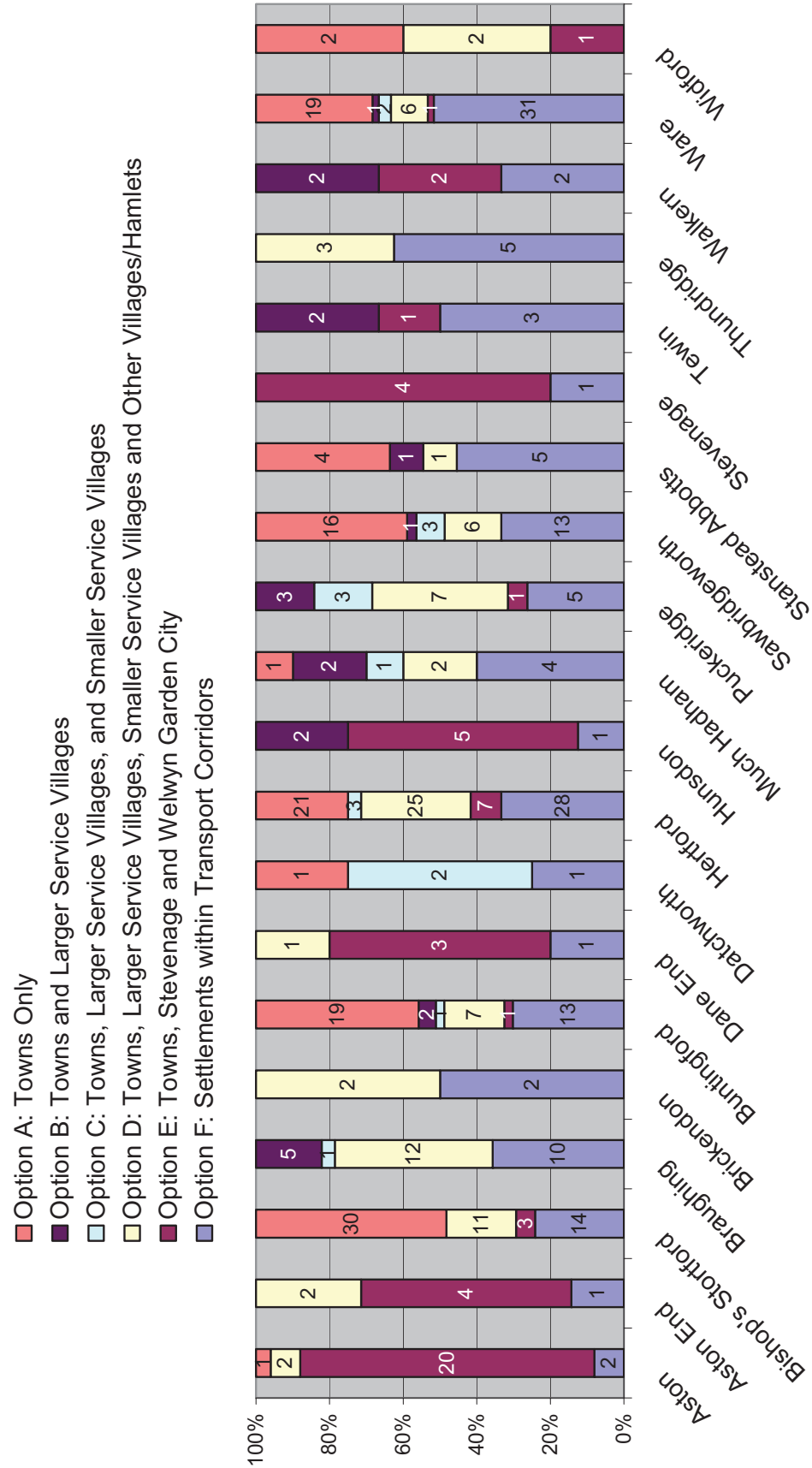
- Option A: Towns Only
- Option B: Towns and Larger Service Villages
- Option C: Towns, Larger Service Villages, and Smaller Service Villages
- Option D: Towns, Larger Service Villages, Smaller Service Villages and Other Villages/Hamlets
- Option E: Towns, Stevenage and Welwyn Garden City
- Option F: Settlements within Transport Corridors



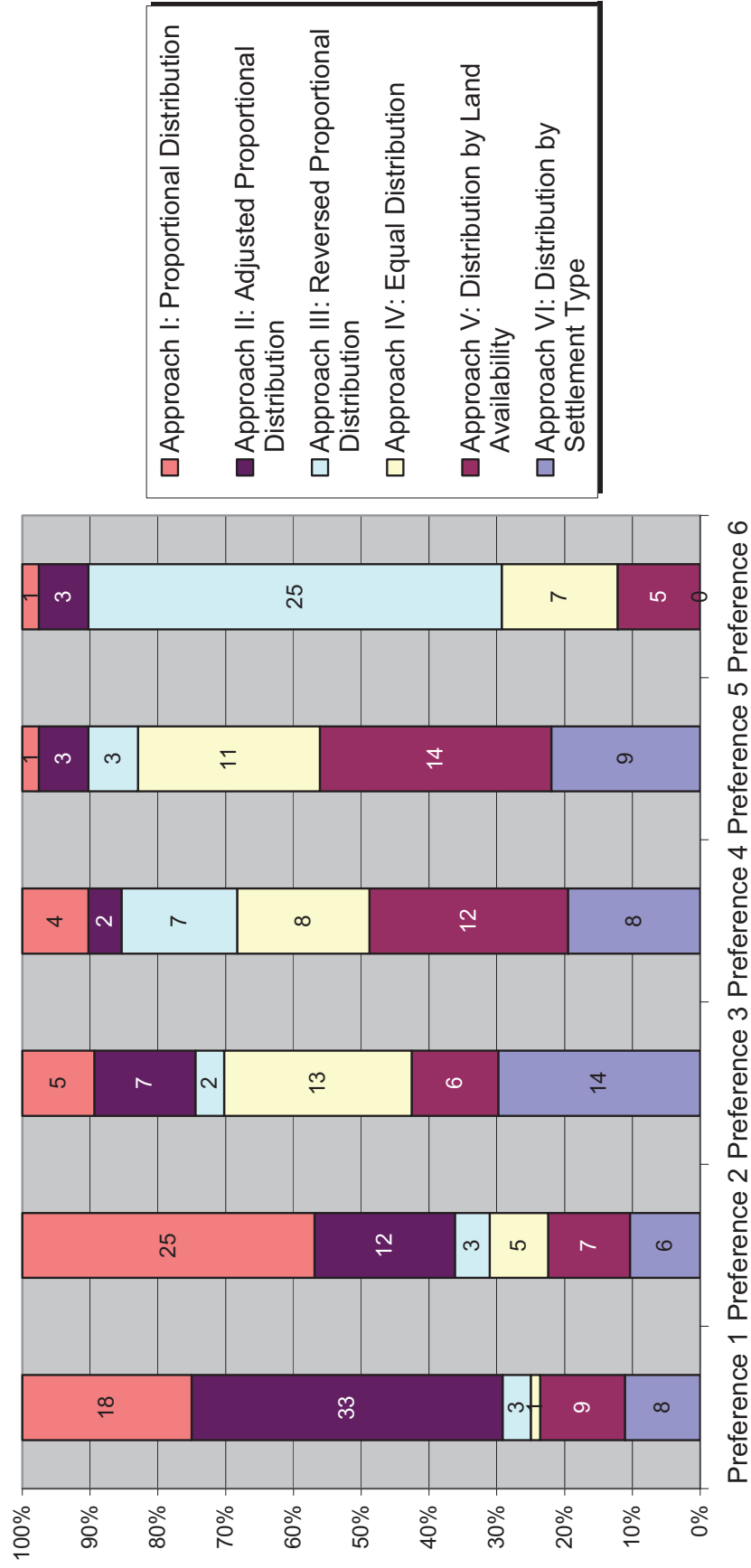
Q22 (continued) - Preference 1 (first preference) by top 20 points of origin



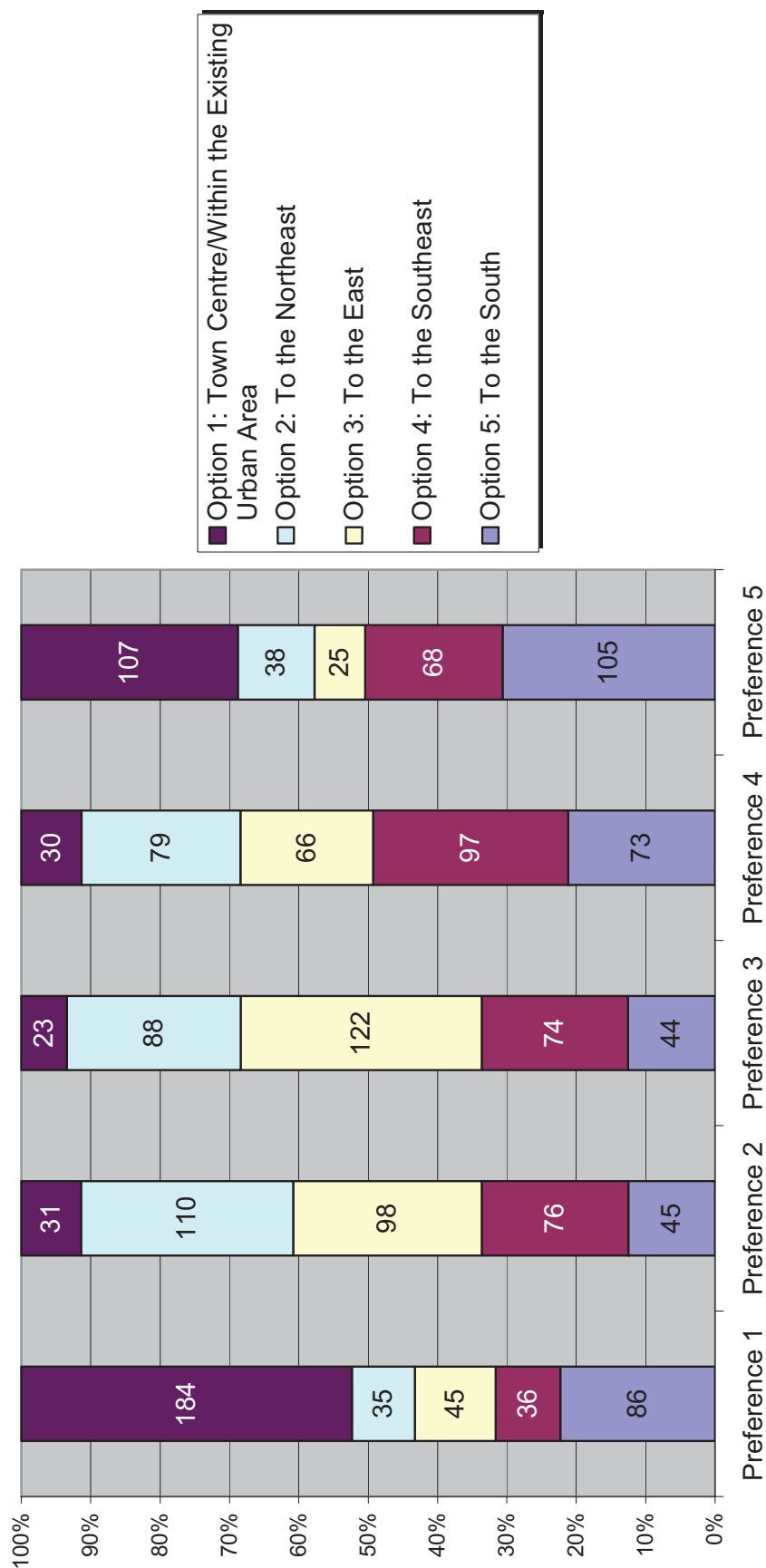
Q22 (continued) - Preference 6 (last preference) by top 20 points of origin



Q23 - Which housing distribution approach do you think is the most appropriate to meet the challenges facing East Herts and achieve sustainable development?

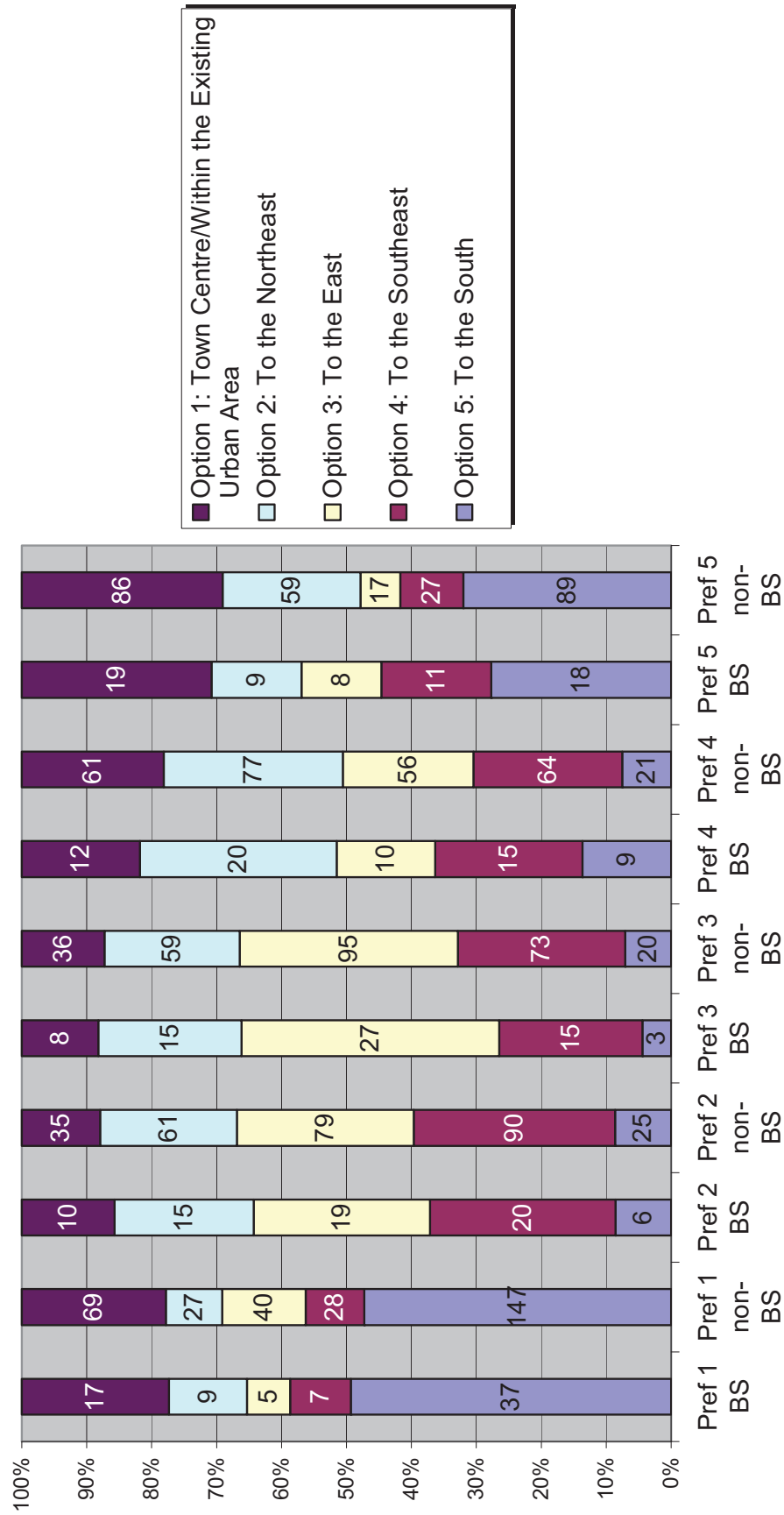


**Q24 - Please rank the growth options for Bishop's Stortford
in order of preference
(Total response)**



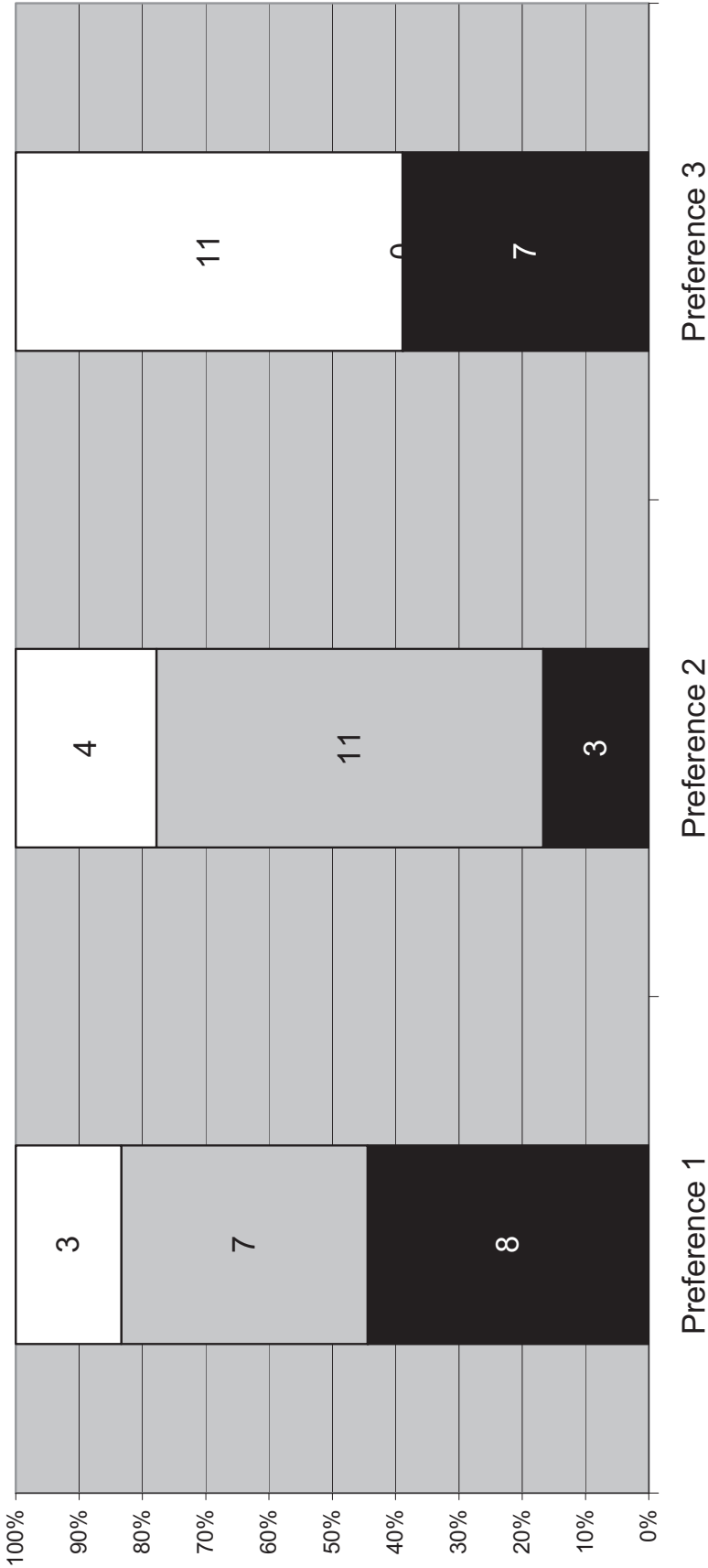
Q24 - Please rank the growth options for Bishop's Stortford

(Note - responses from Bishop's Stortford and responses from elsewhere are shown separately)



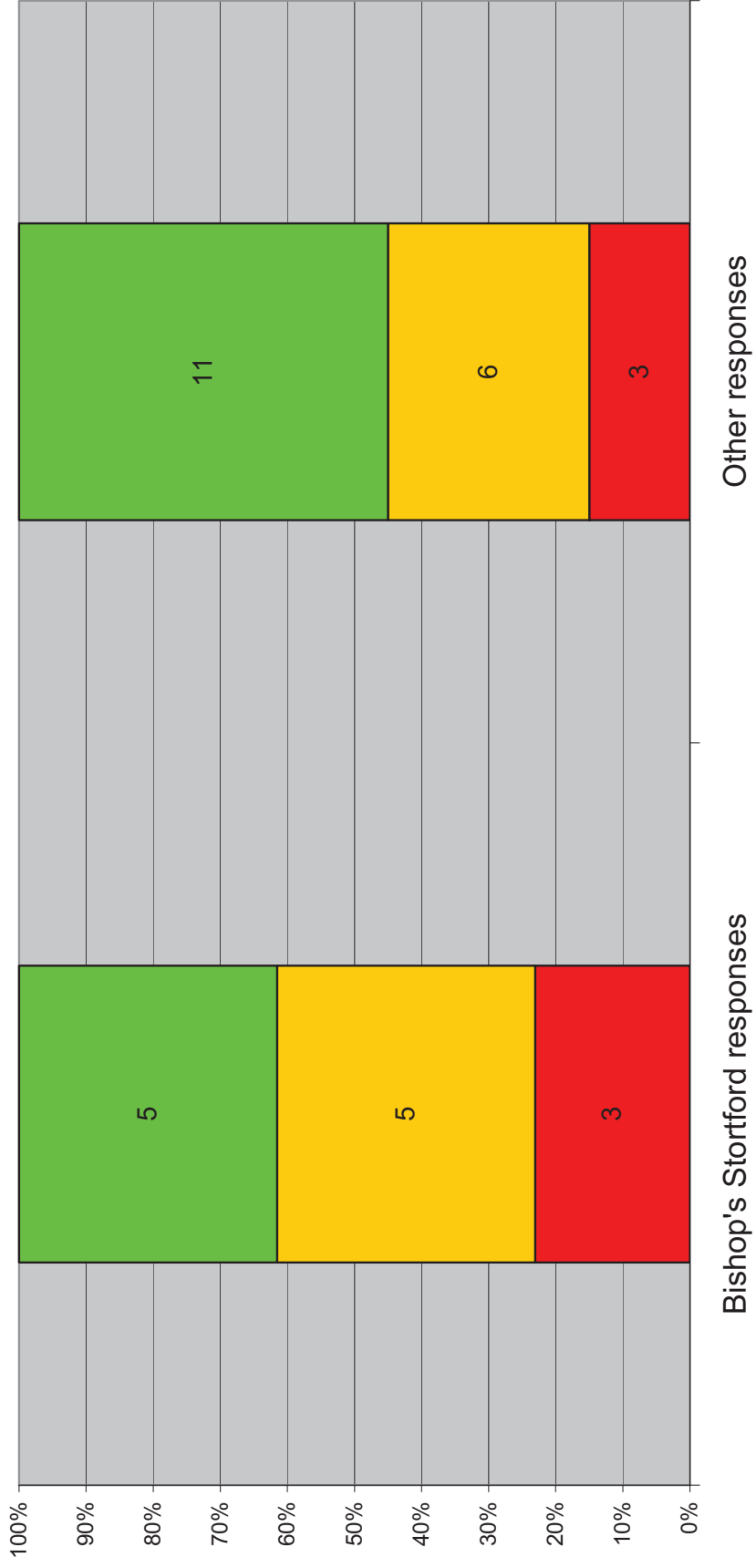
Q25 - Please rank the approaches to development in Bishop's Stortford in order of preference

- 1. Lower density - therefore higher land-take
- ▒ 2. Medium density - therefore medium land-take
- 3. Higher density - therefore lower land-take

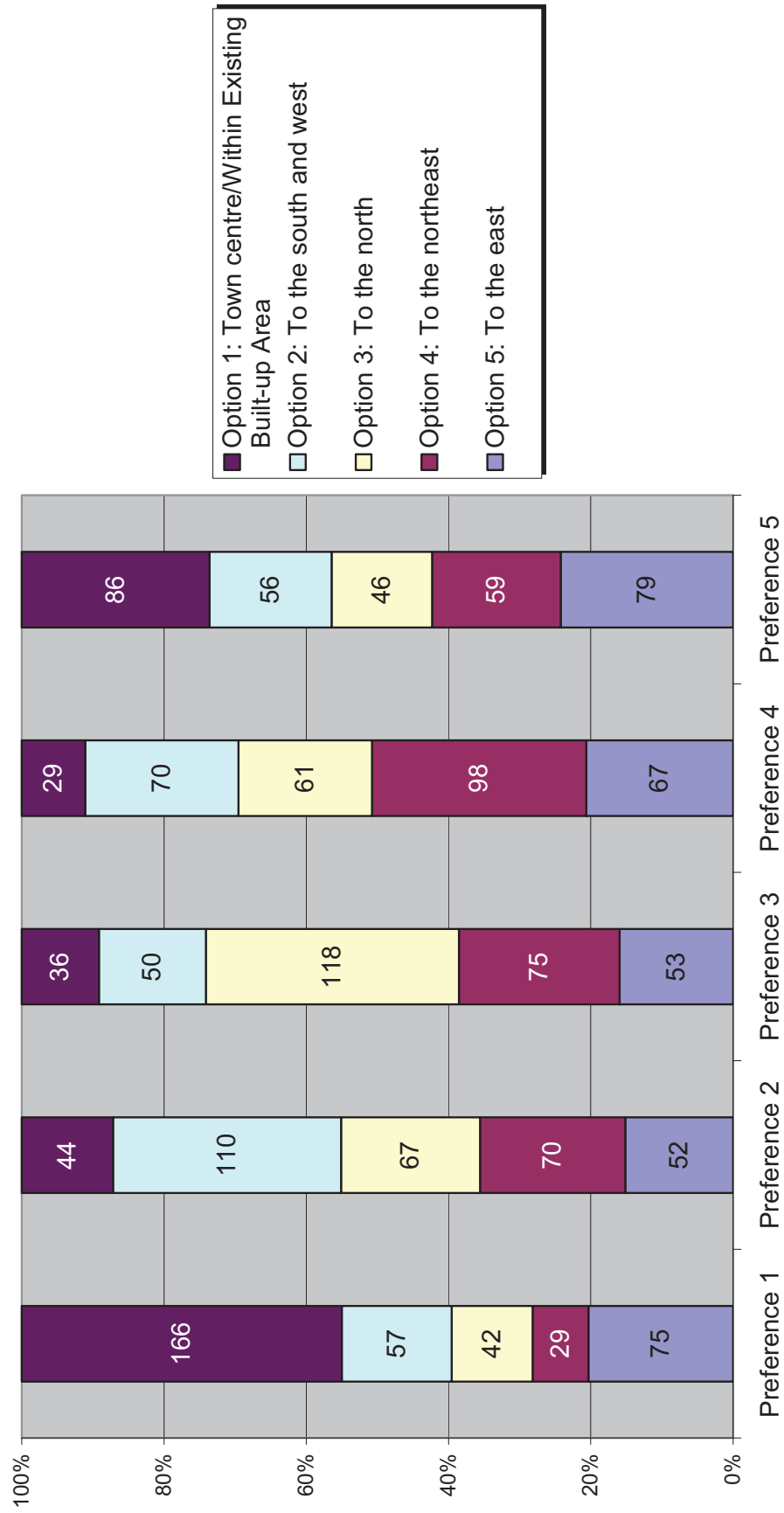


Question 26:
Do you agree with the emerging LDF vision for Bishop's Stortford?

■ Disagree
 ■ Partly agree
 ■ Agree

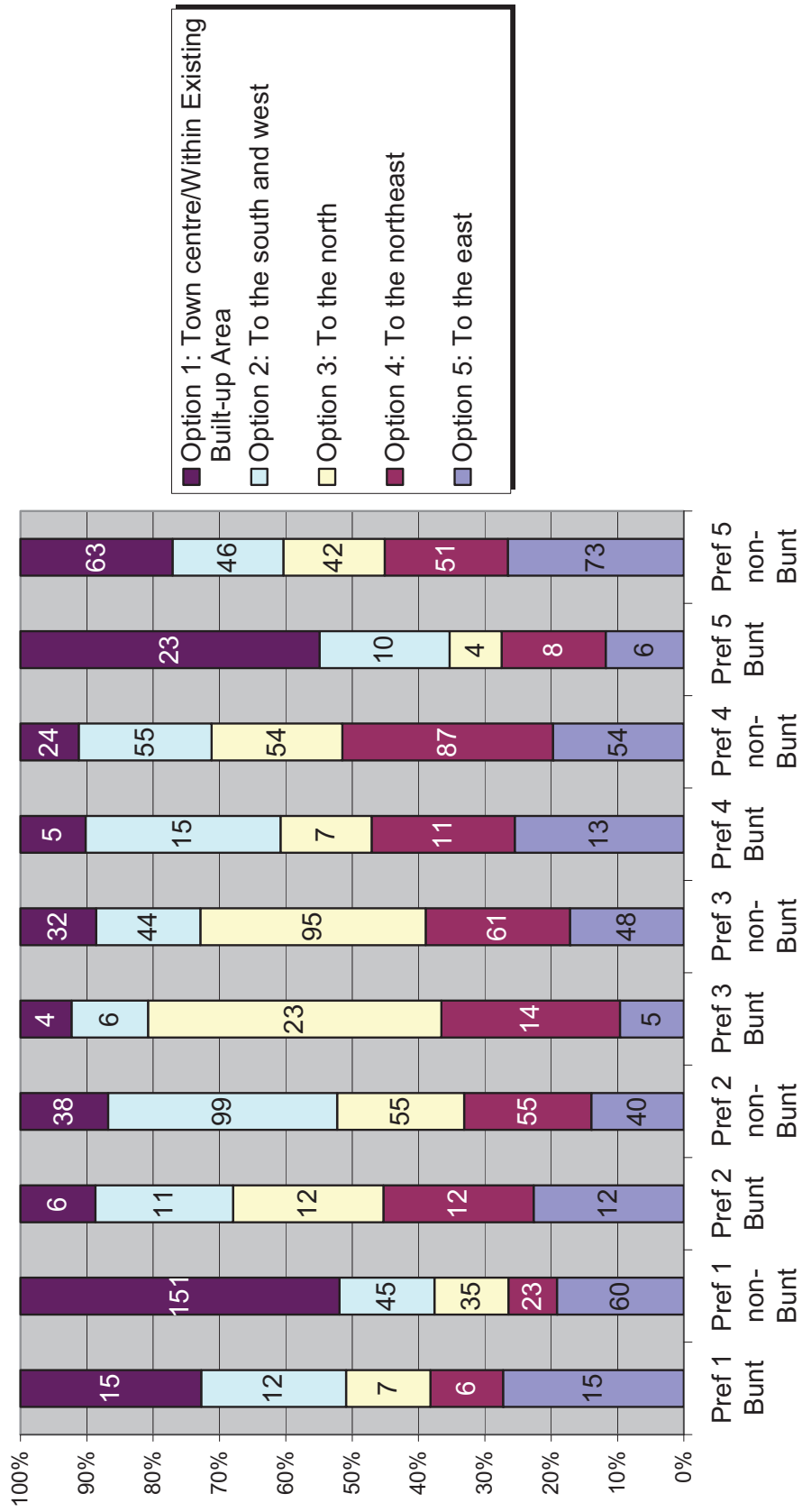


Q27 - Please rank the growth options for Hertford in order of preference
(Total responses)



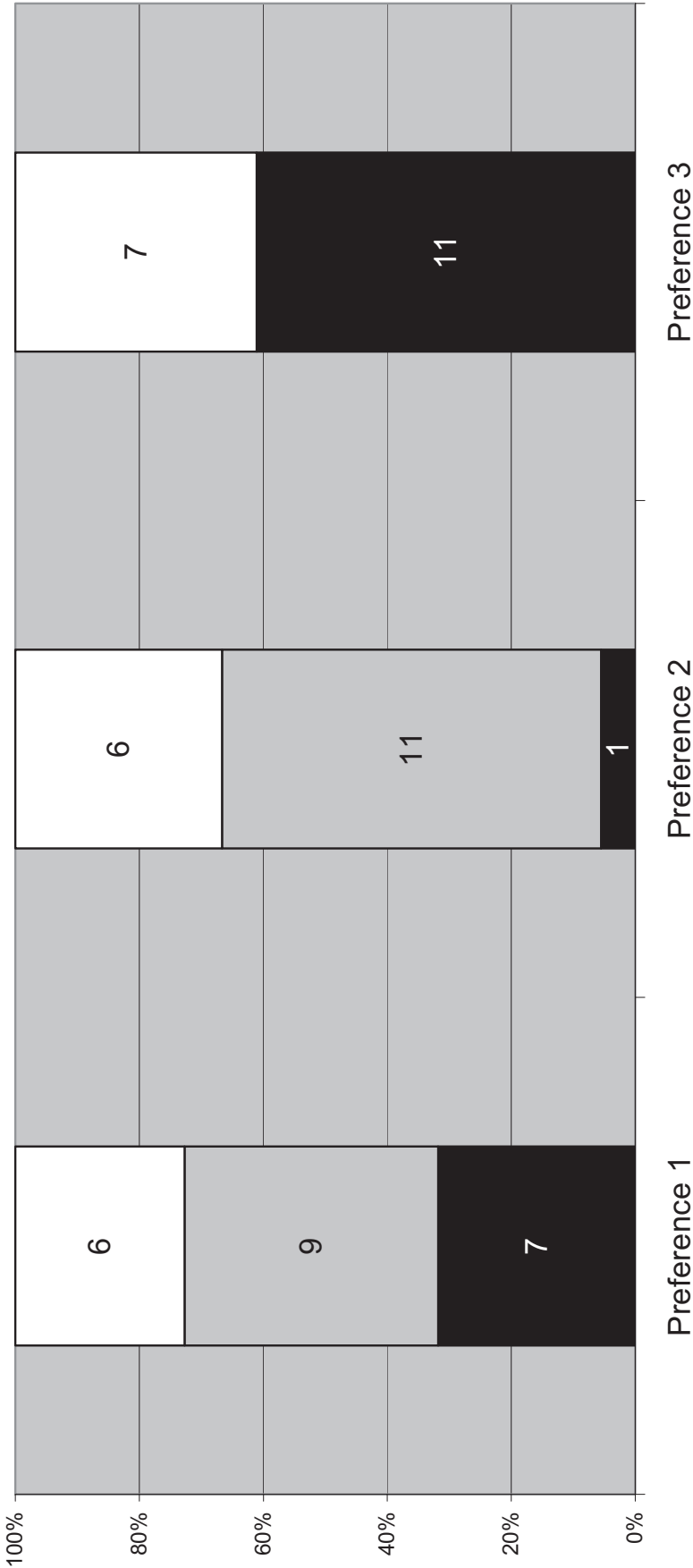
Q27 - Please rank the growth options for Buntingford in order of preference

(responses from Buntingford and elsewhere are shown separately)



Q28 - Please rank the approaches to development in Buntingford
in order of preference

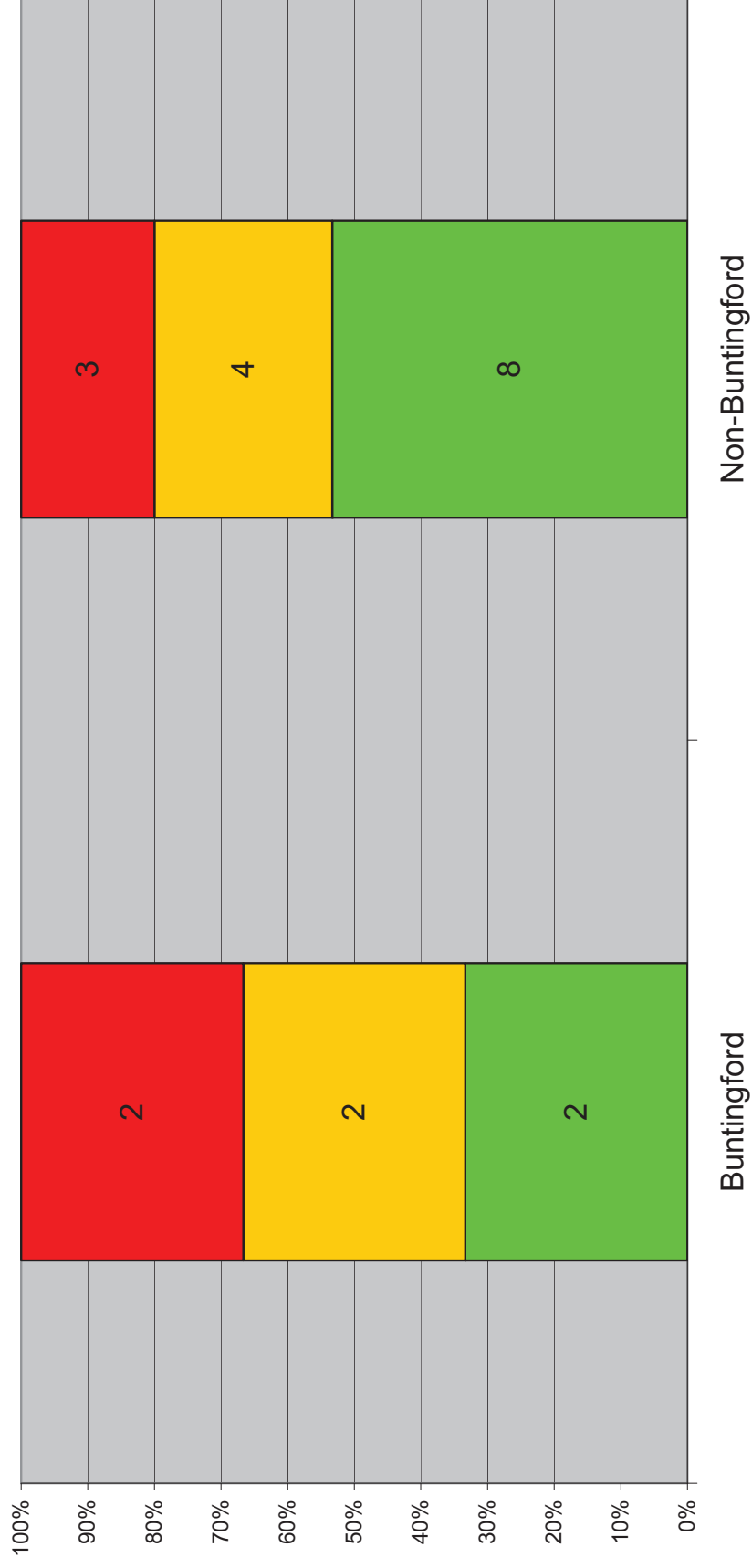
- 1. Lower density - therefore higher land-take
- ▒ 2. Medium density - therefore medium land-take
- 3. Higher density - therefore lower land-take



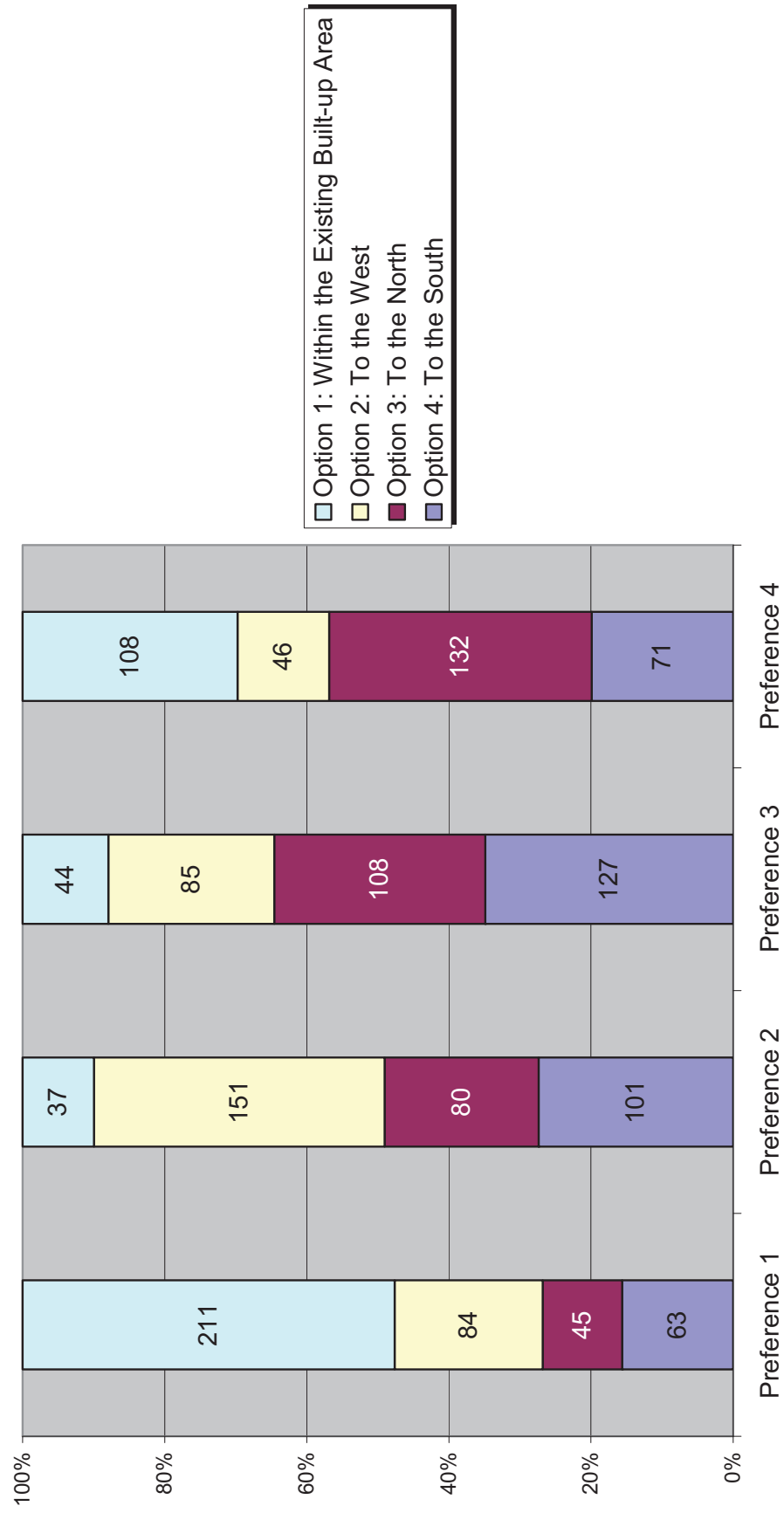
Q29 - Do you agree with the emerging vision for Buntingford?

(Responses from Buntingford and elsewhere are shown separately)

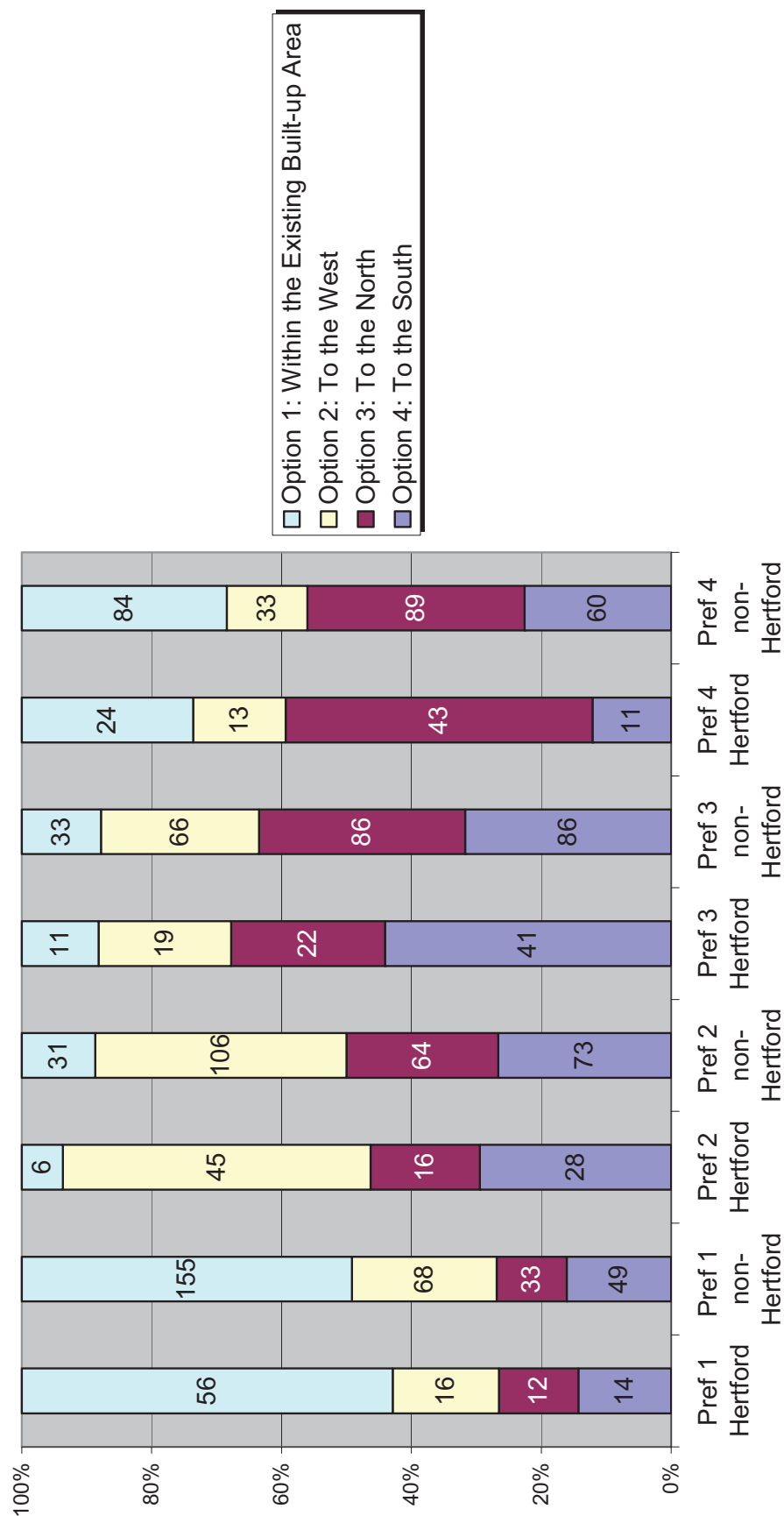
■ Agree
 ■ Partly agree
 ■ Disagree



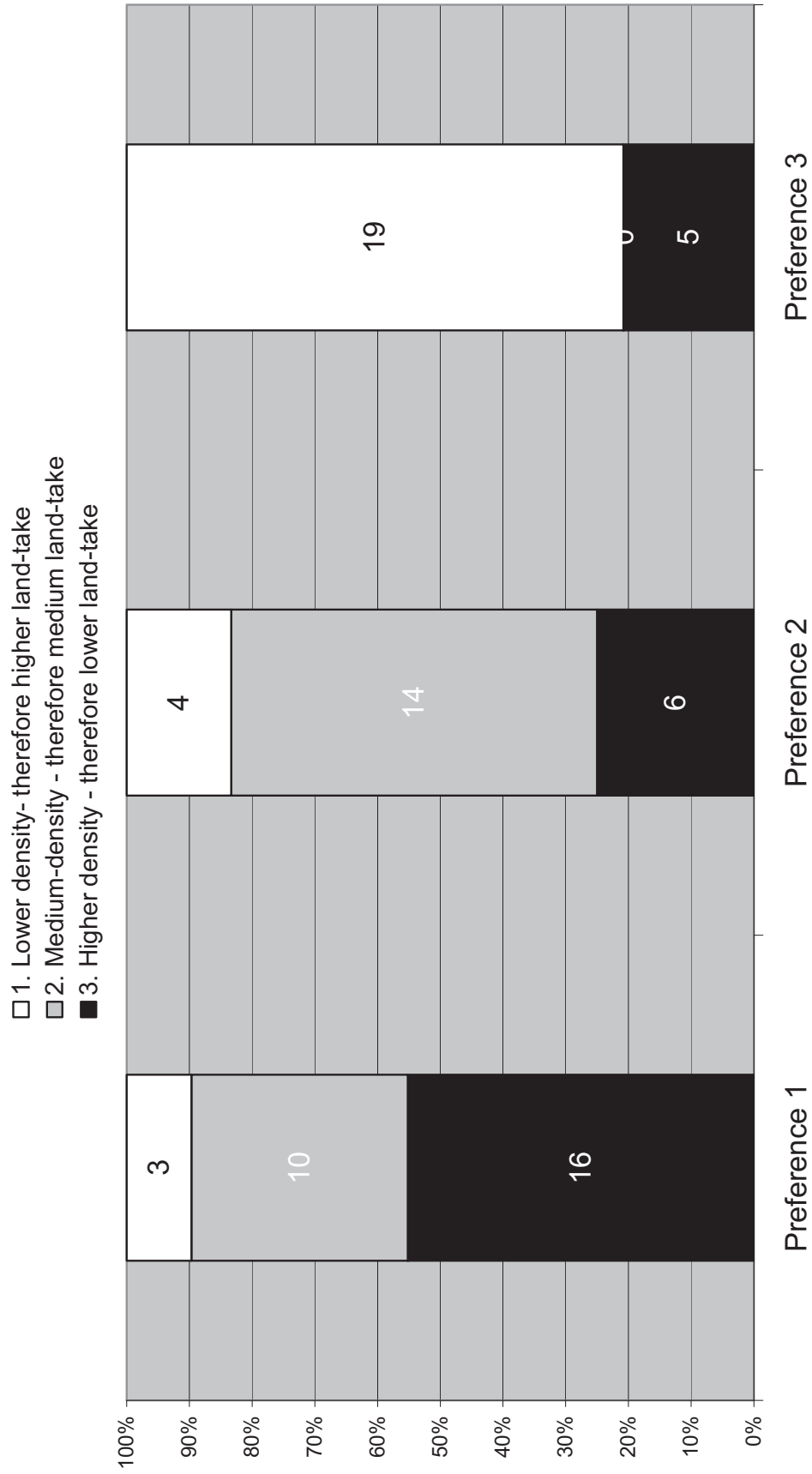
Q30 - Please rank the growth options for Hertford in order of preference
(Total responses)



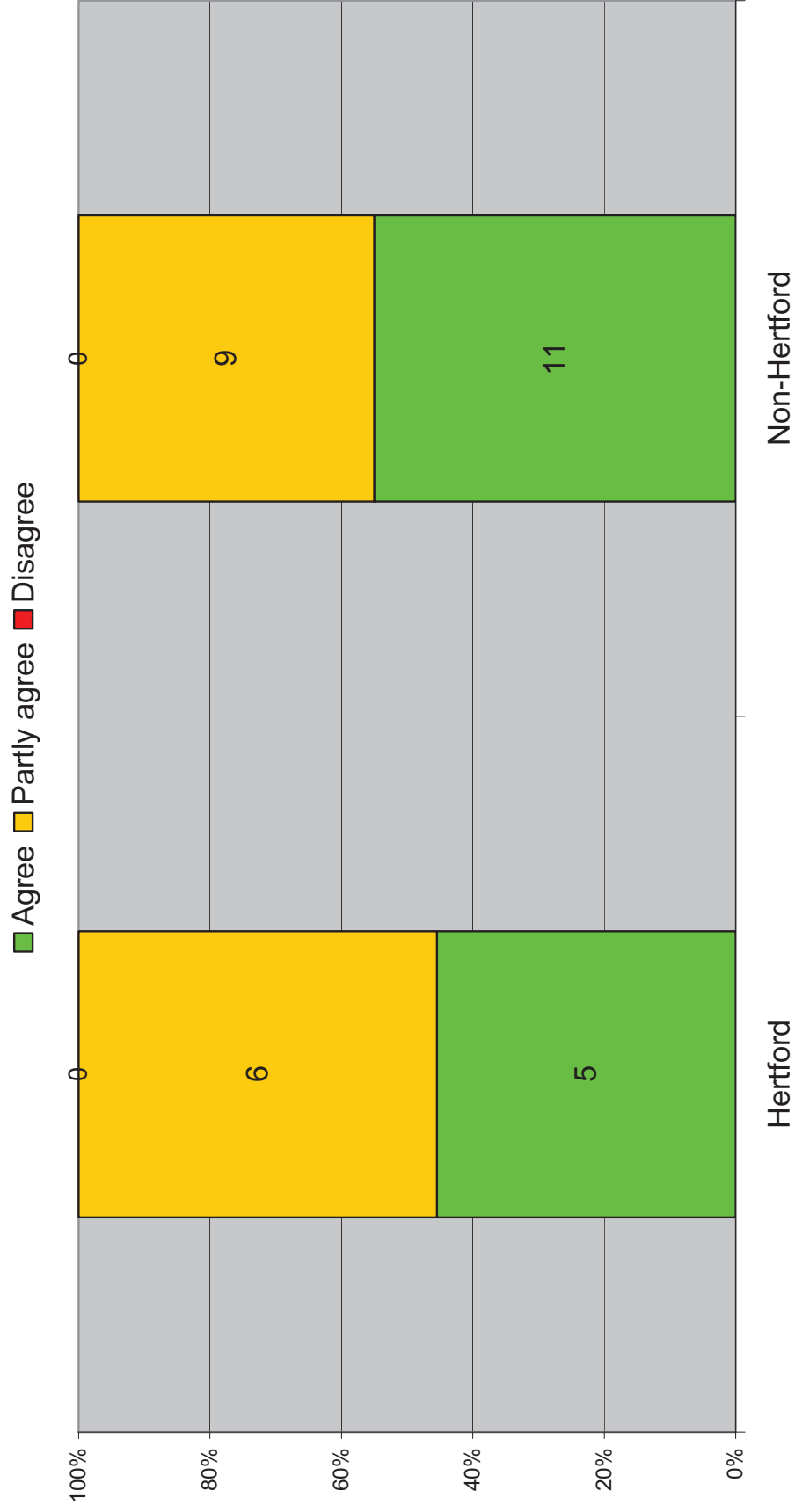
Q30 - Please rank the growth options for Hertford in order of preference (Responses from Hertford and elsewhere are shown separately)



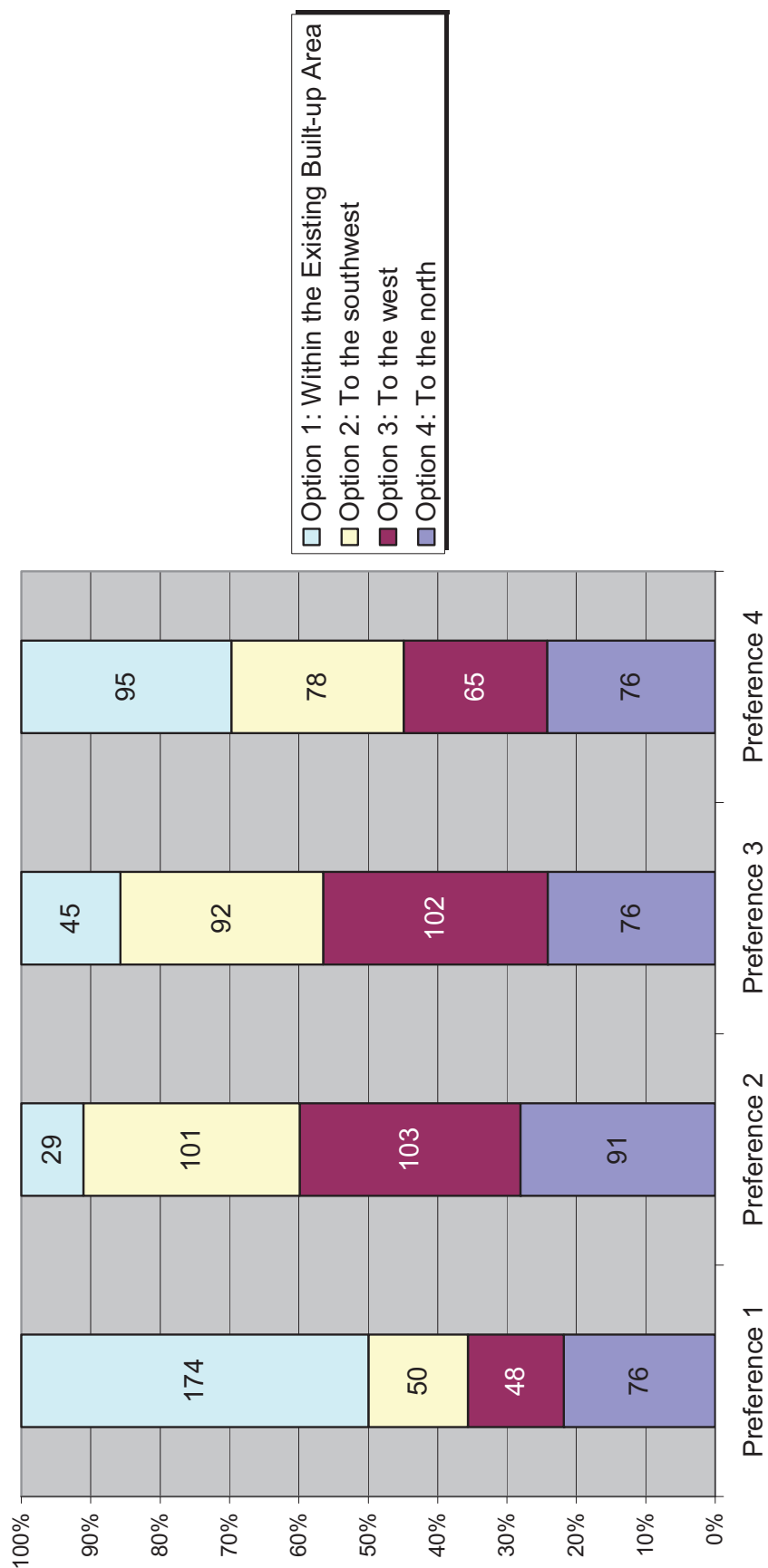
Q31 - Please rank the approaches to development in Hertford



Q32 - Do you agree with the emerging LDF Vision for Hertford? (Responses from Hertford and elsewhere are shown separately)

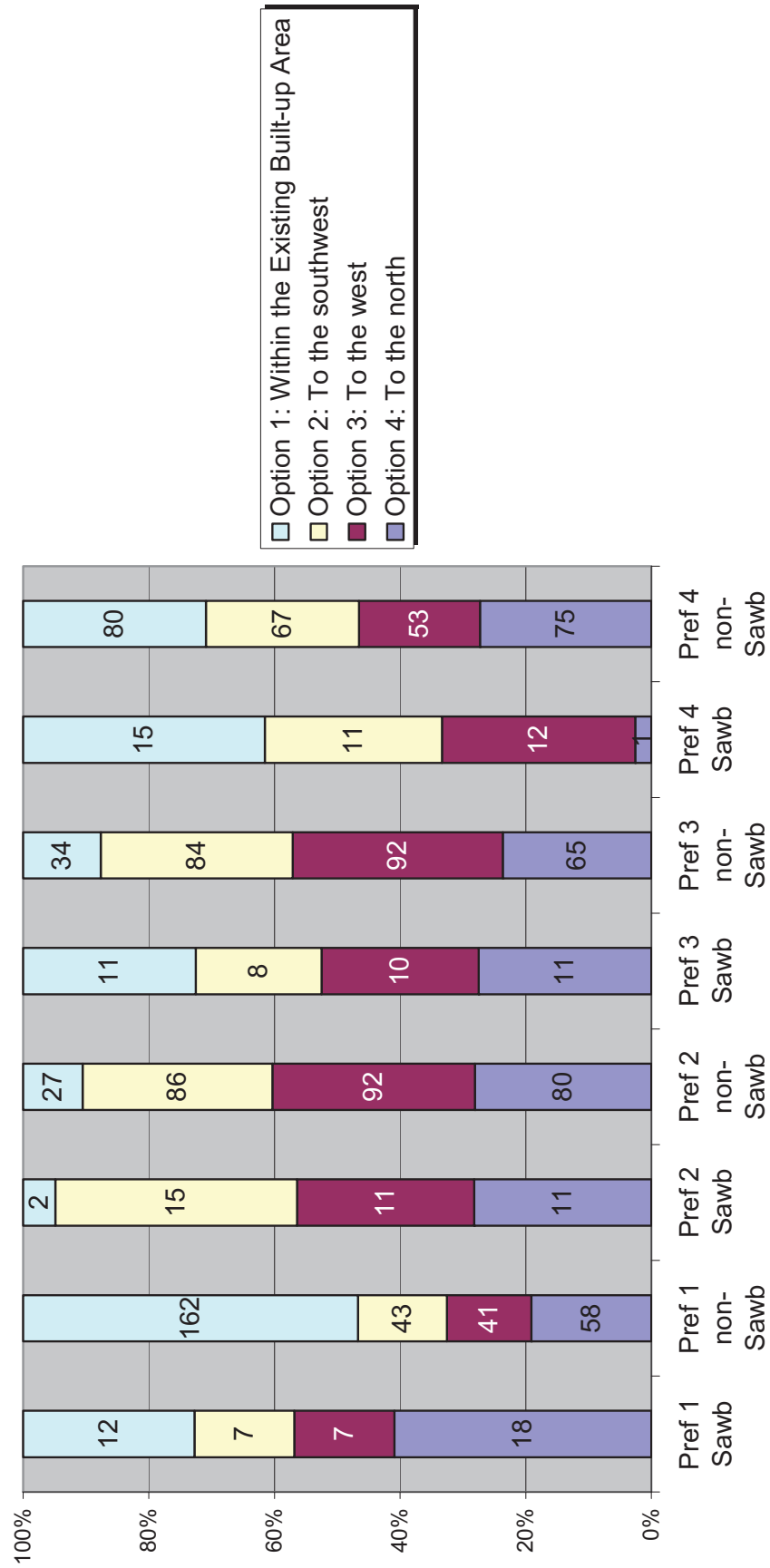


**Q33 - Please rank the growth options for Sawbridgeworth
in order of preference
(Total Responses)**



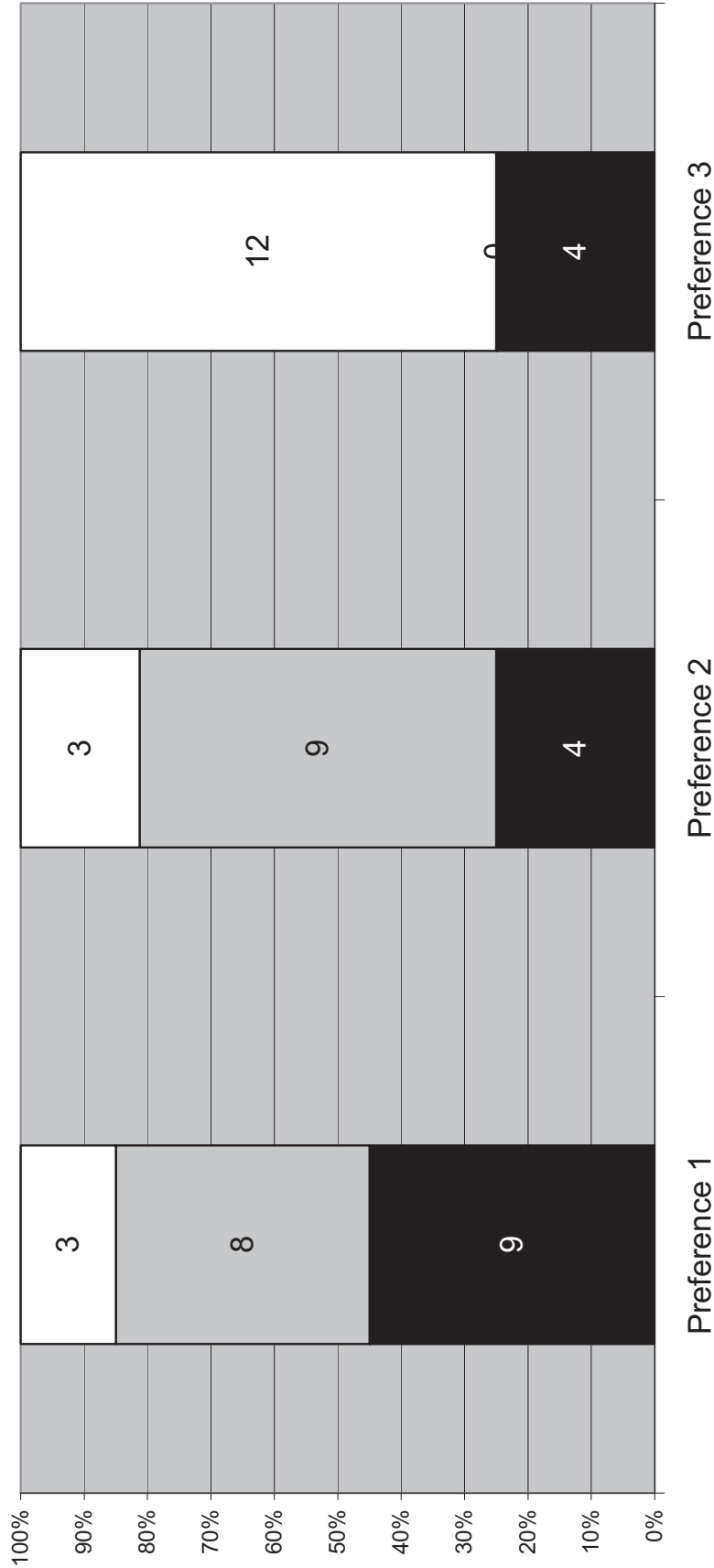
Q33 - Please rank the growth options for Sawbridgeworth in order of preference

(Responses from Sawbridgeworth and elsewhere are shown separately)

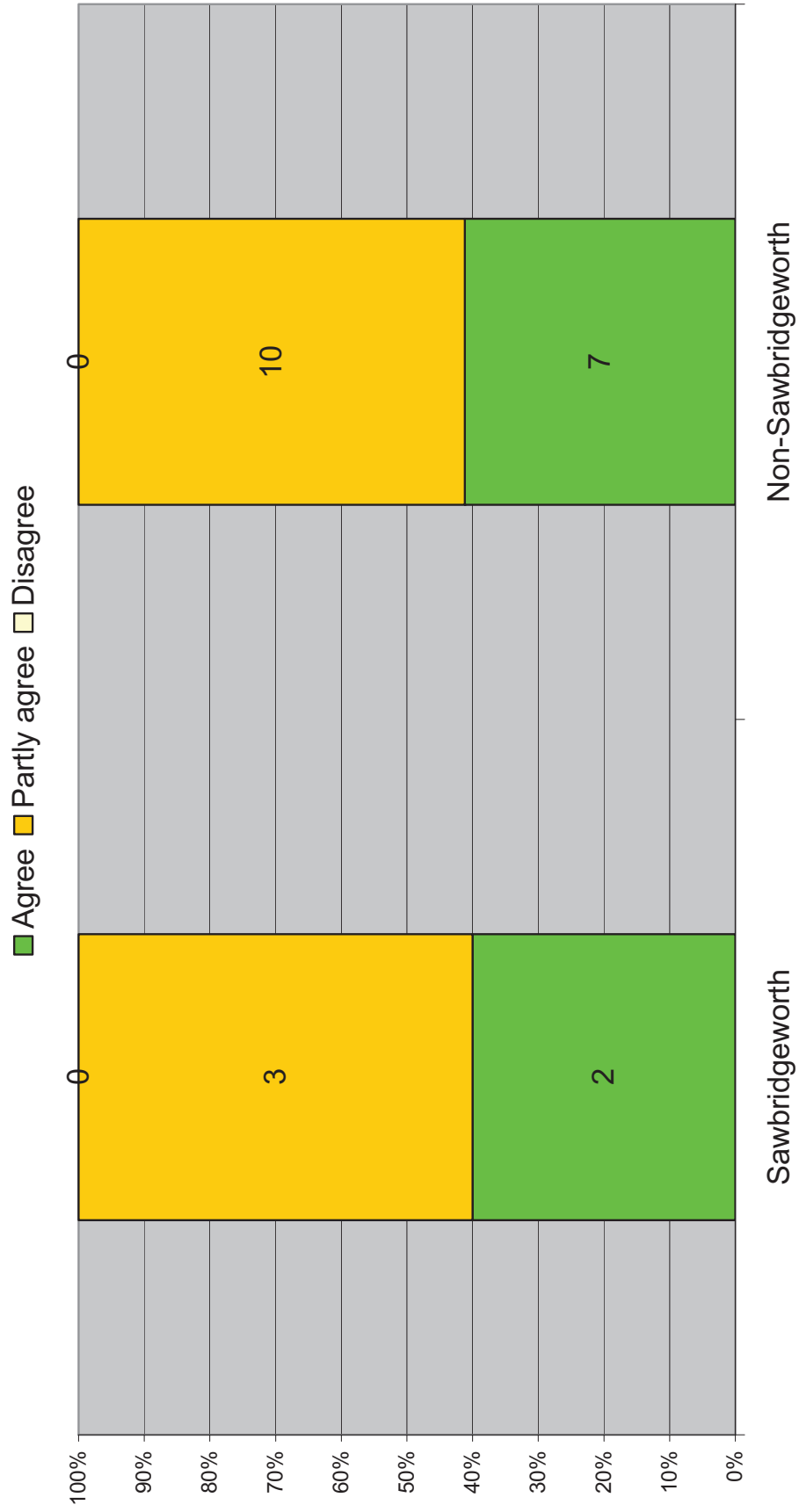


Q34 - Please rank the approaches to development in Sawbridgeworth in order of preference

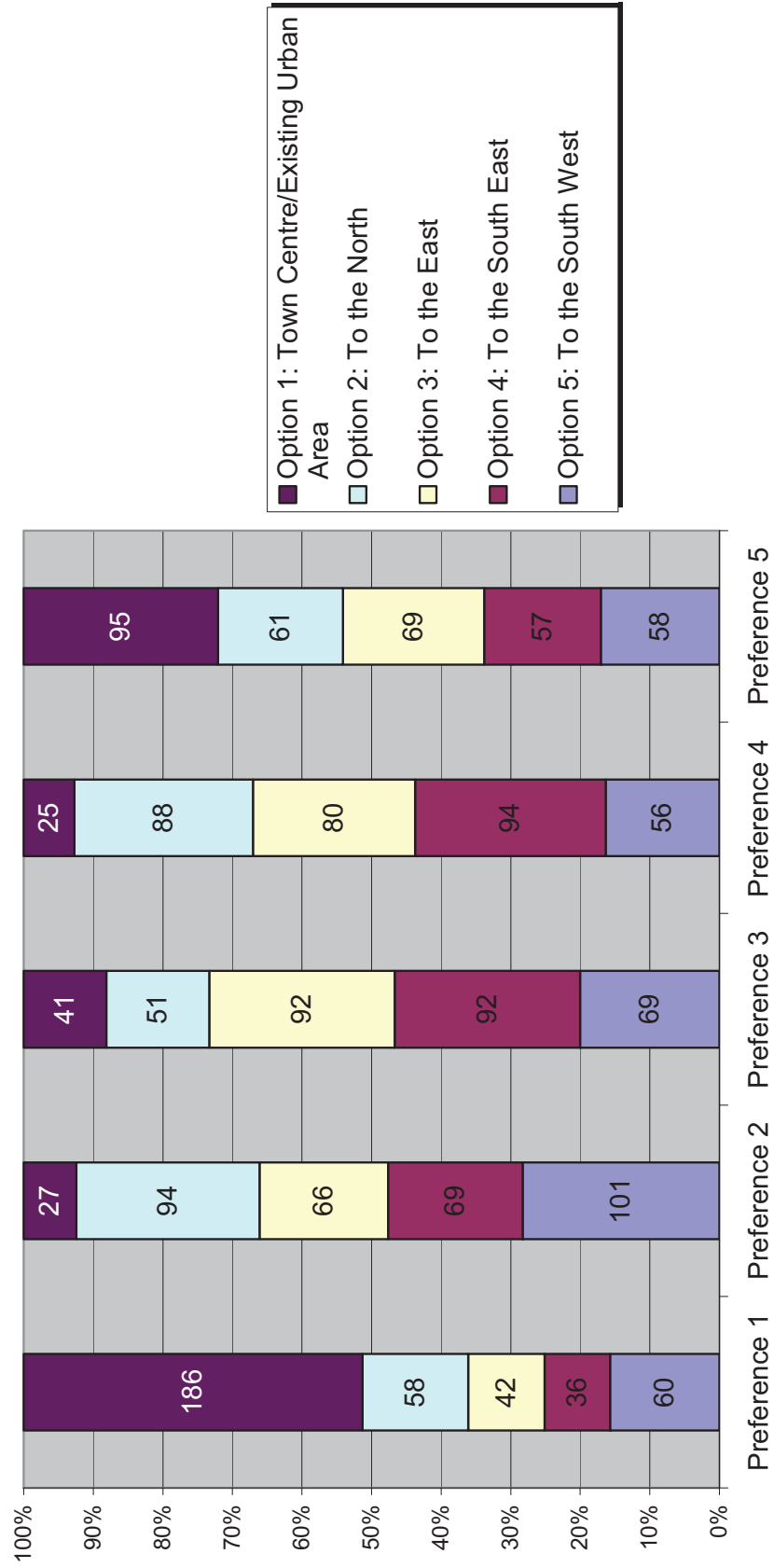
- 1. Lower density - therefore higher land-take
- 2. Medium density - therefore medium land-take
- 3. Higher density - therefore lower land-take



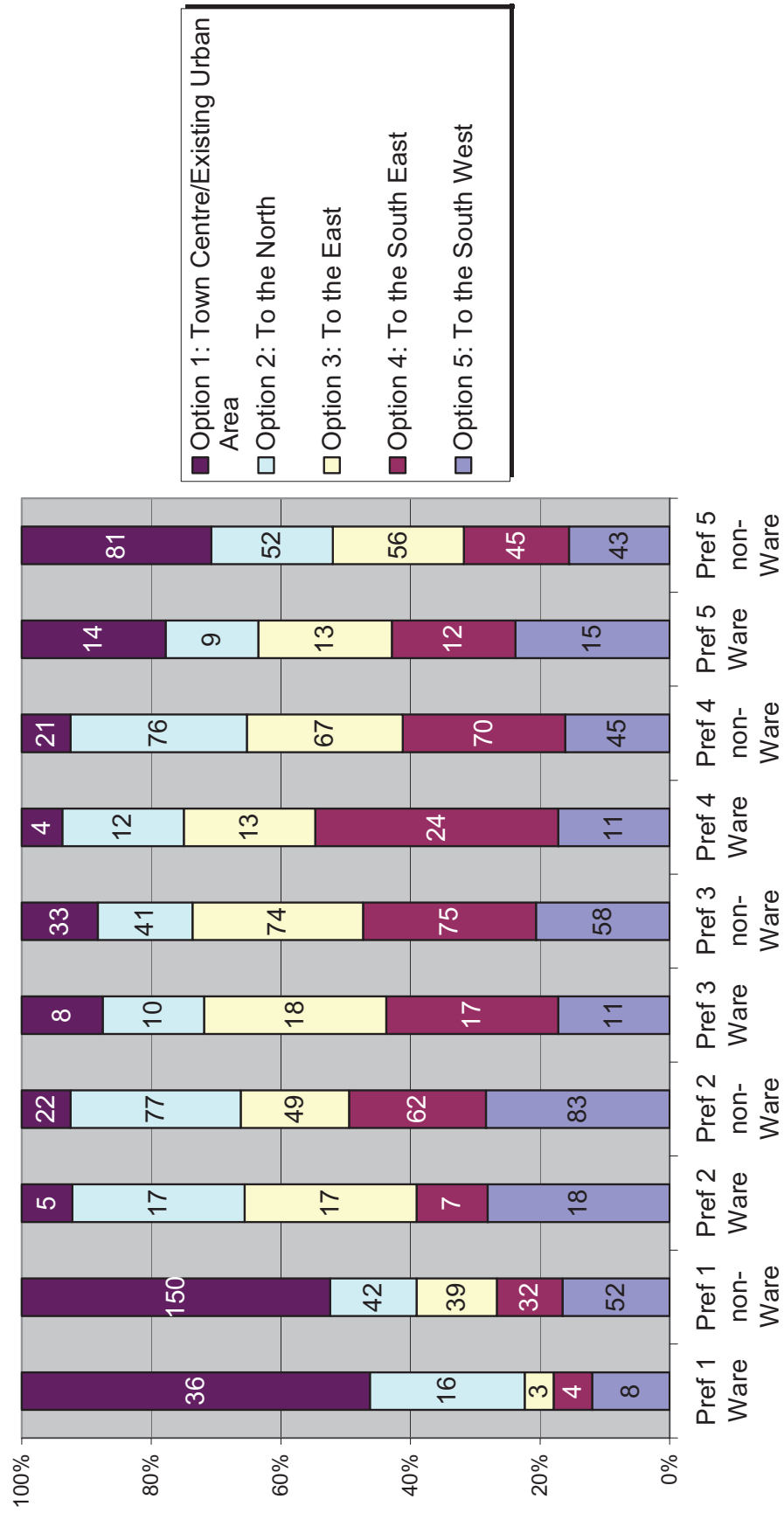
Q35 - Do you agree with the emerging LDF vision for Sawbridgeworth? (Responses from Sawbridgeworth and elsewhere shown separately)



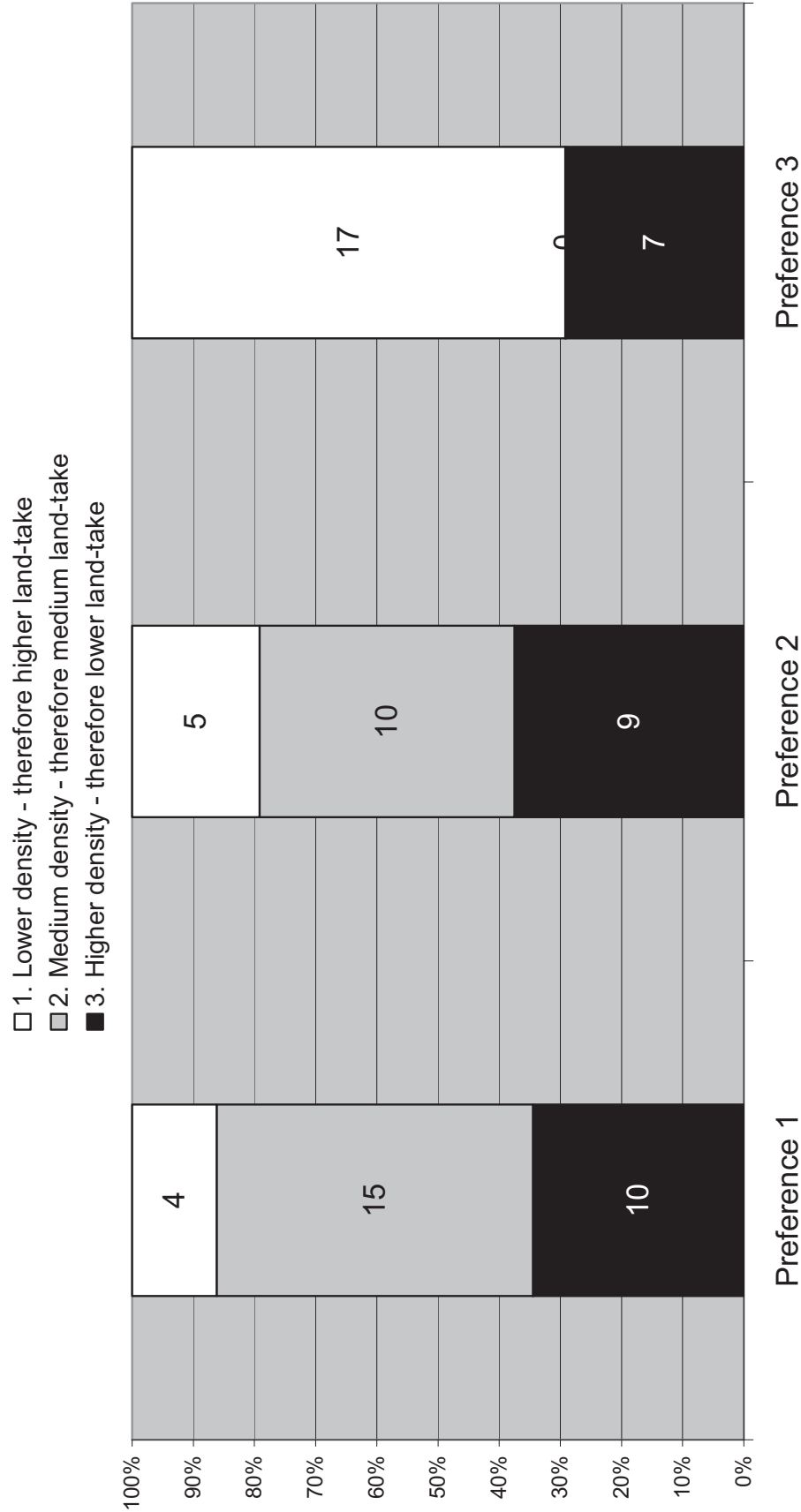
Q36 - Please rank the growth options for Ware in order of preference
(Total Responses)



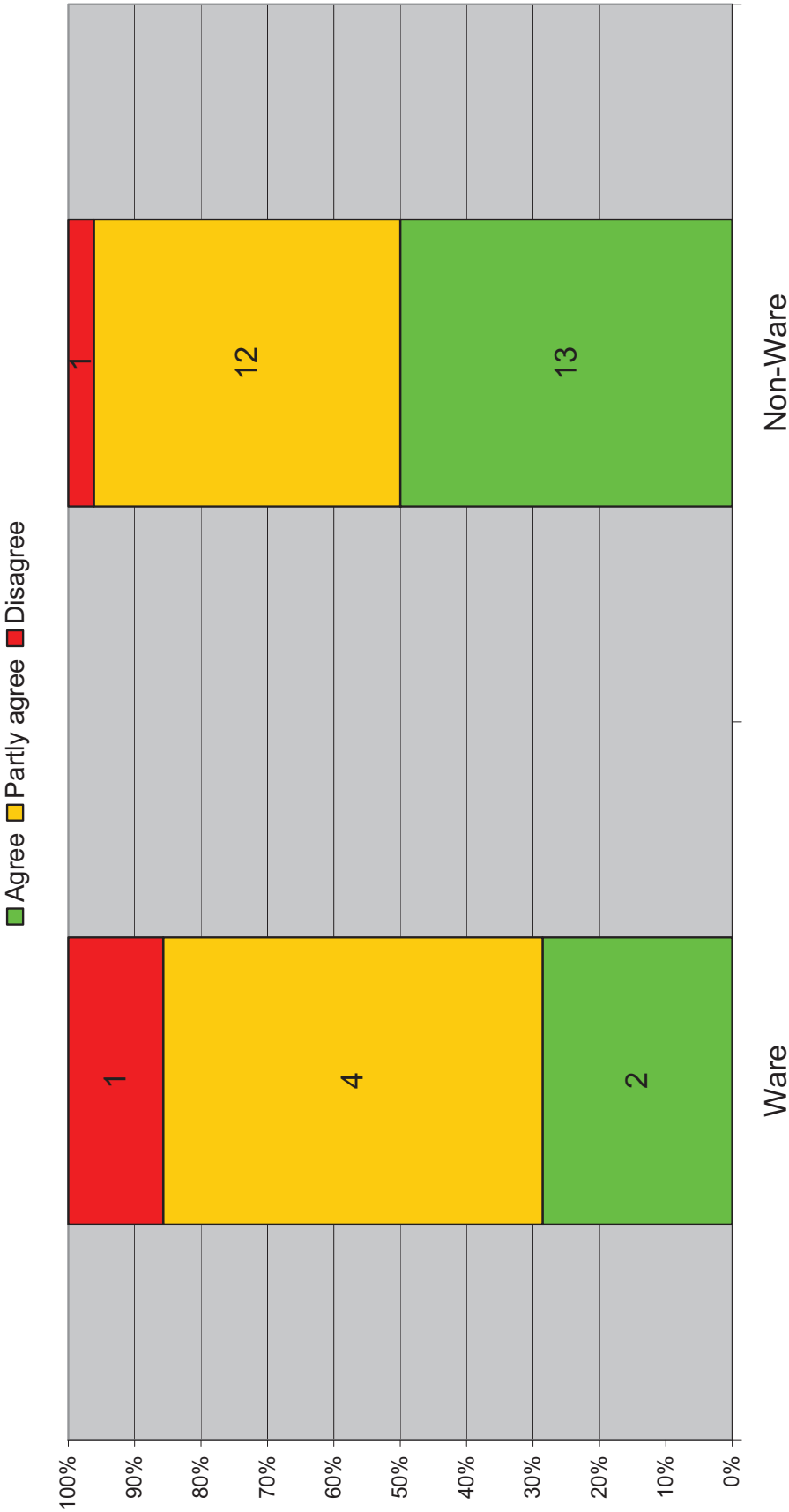
Q36 - Please rank the growth options for Ware in order of preference (Responses from Ware and elsewhere are shown separately)



Q37 - Please rank the approaches to development in Ware in order of preference

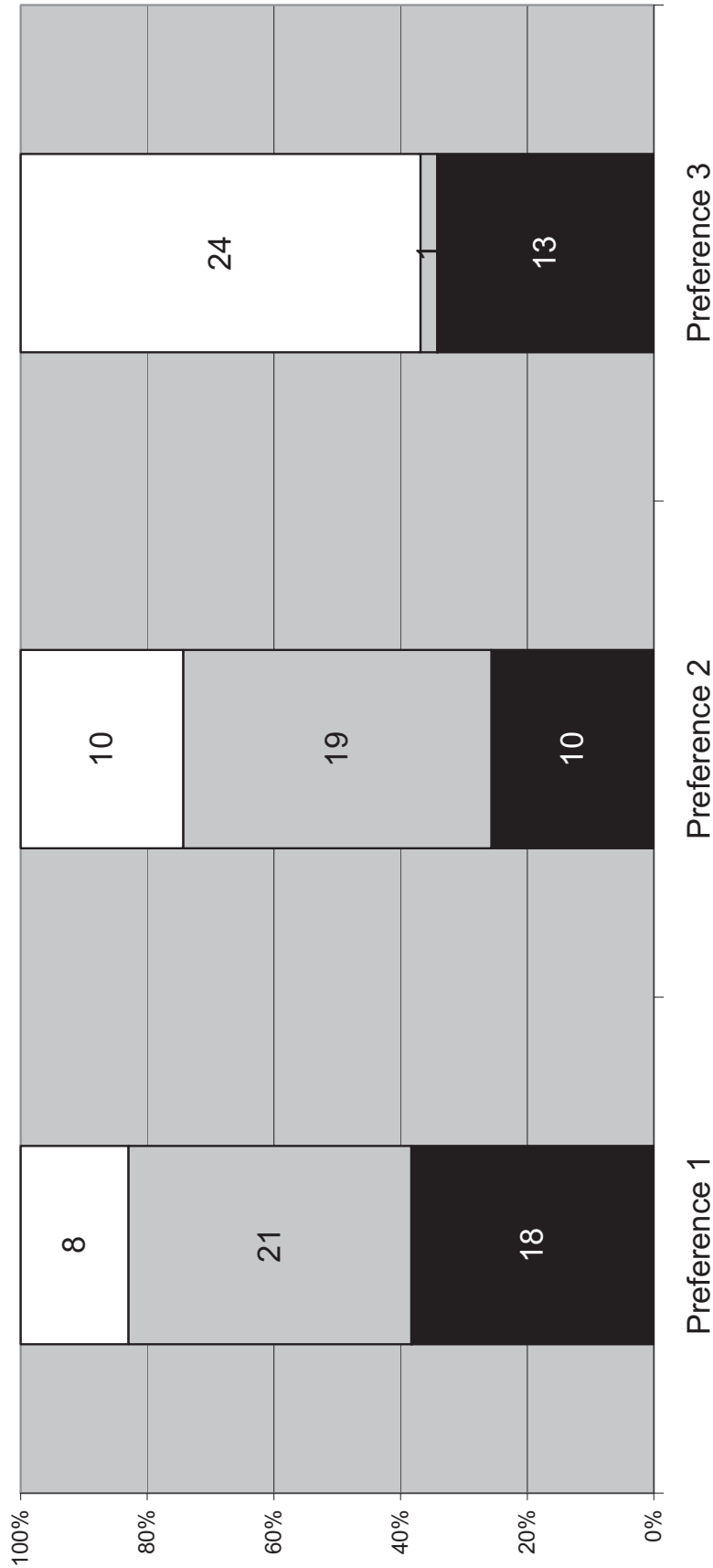


Q38 - Do you agree with the emerging LDF vision for Ware?
(Responses from Ware and elsewhere are shown separately)

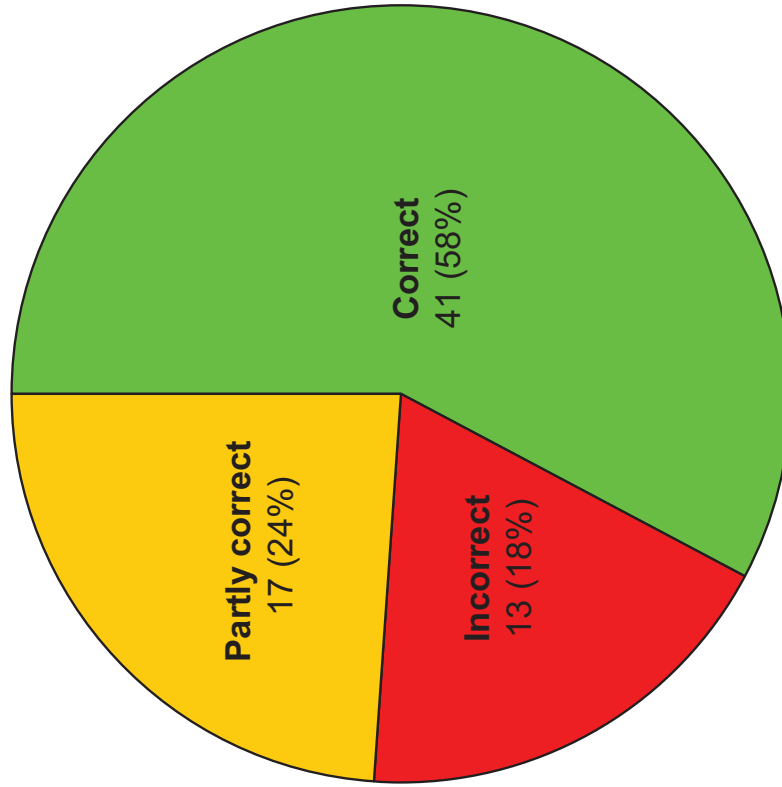


Q39 - Please rank the approaches to development in the villages in order of preference

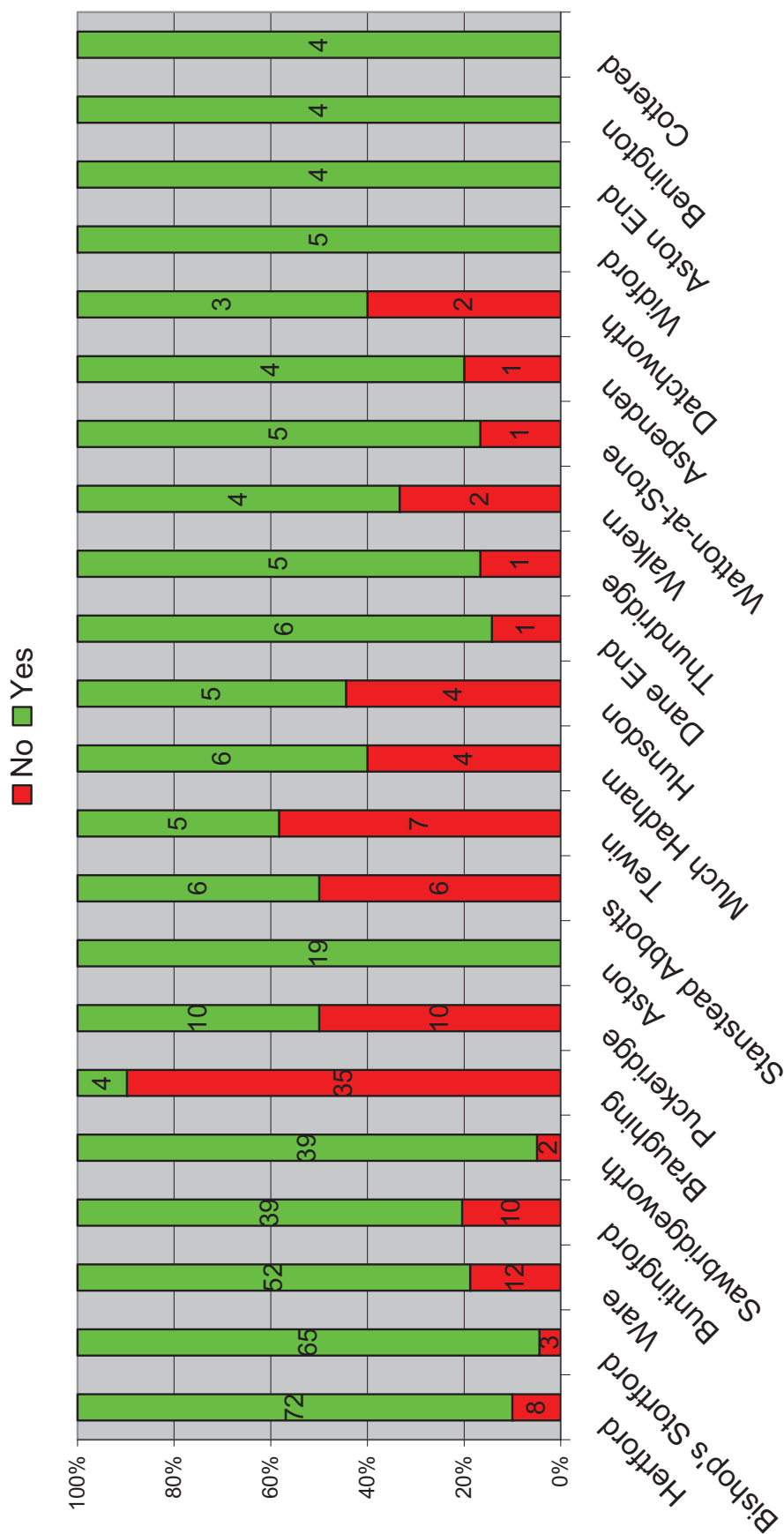
- 1. Lower density - therefore higher land-take
- ▒ 2. Medium density - therefore medium land-take
- 3. Higher density - therefore lower land-take



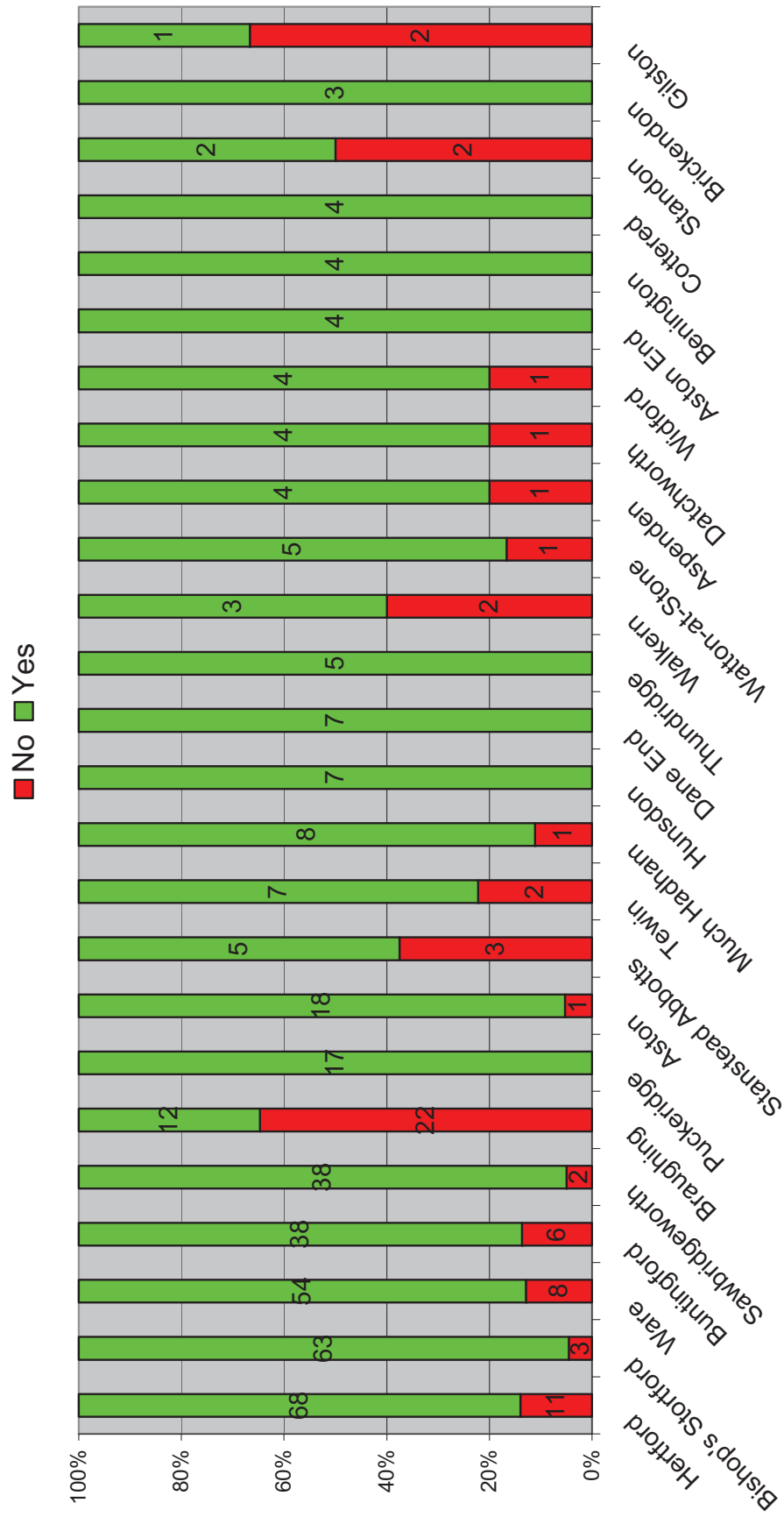
Q40 - Is our approach to identifying three types of village (Larger Service Villages, Smaller Service Villages and Other Villages/Hamlets) correct?



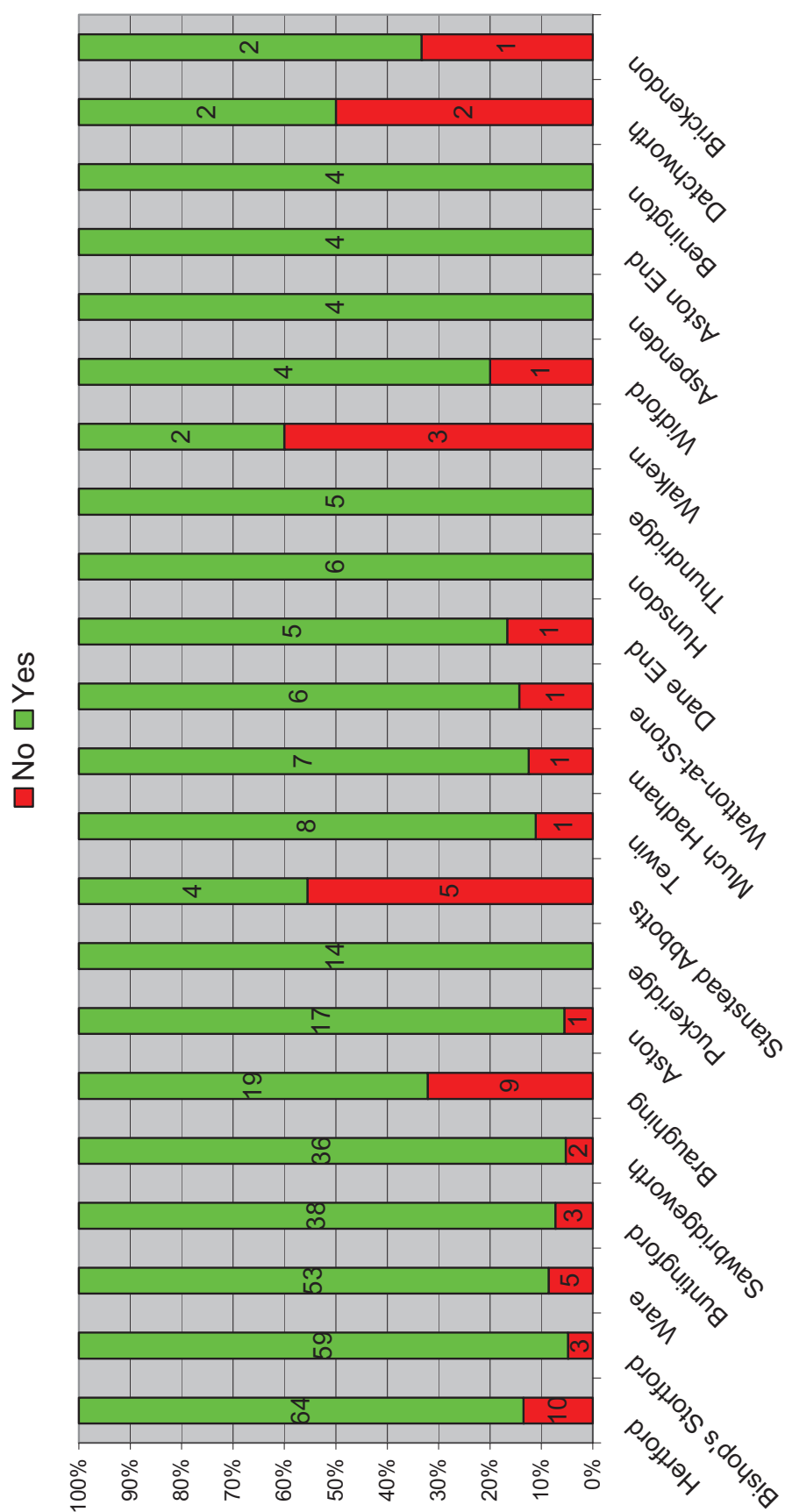
Q41 - Have we identified the correct villages under each village type? Top 20 responses by point of origin (LARGER SERVICE VILLAGES)



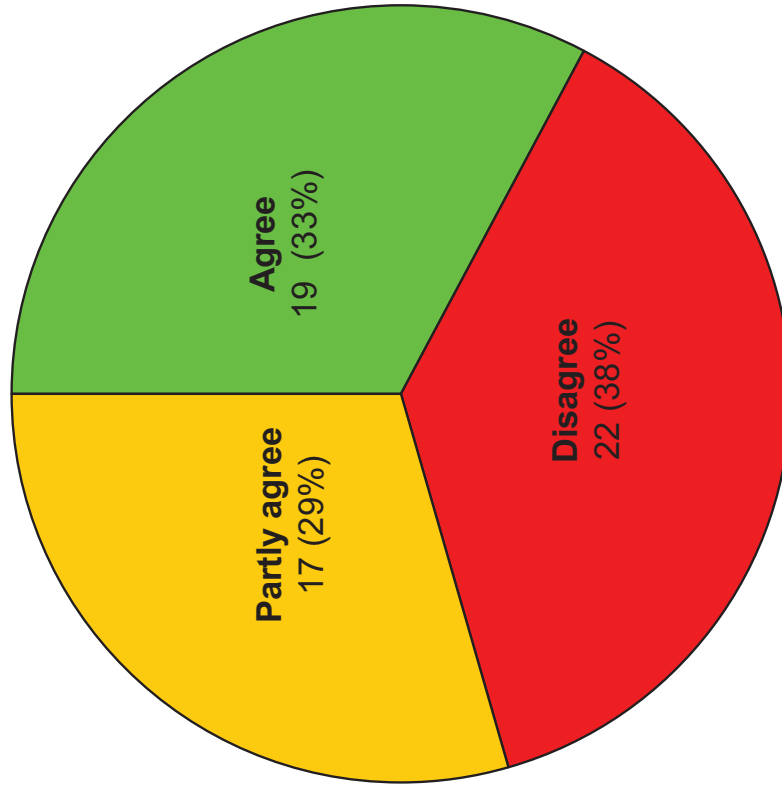
Q41 - Have we identified the correct villages under each village type? Top 20 by point of origin (SMALLER SERVICE VILLAGES)



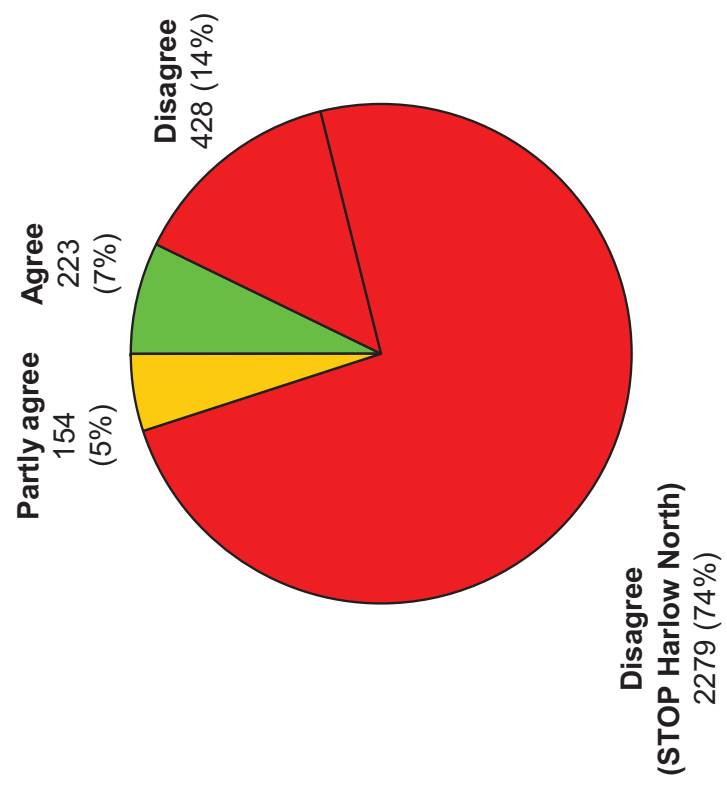
Q41 - Have we identified the correct villages under each type of village?
Top 20 by point of origin (OTHER VILLAGES/HAMLETS)



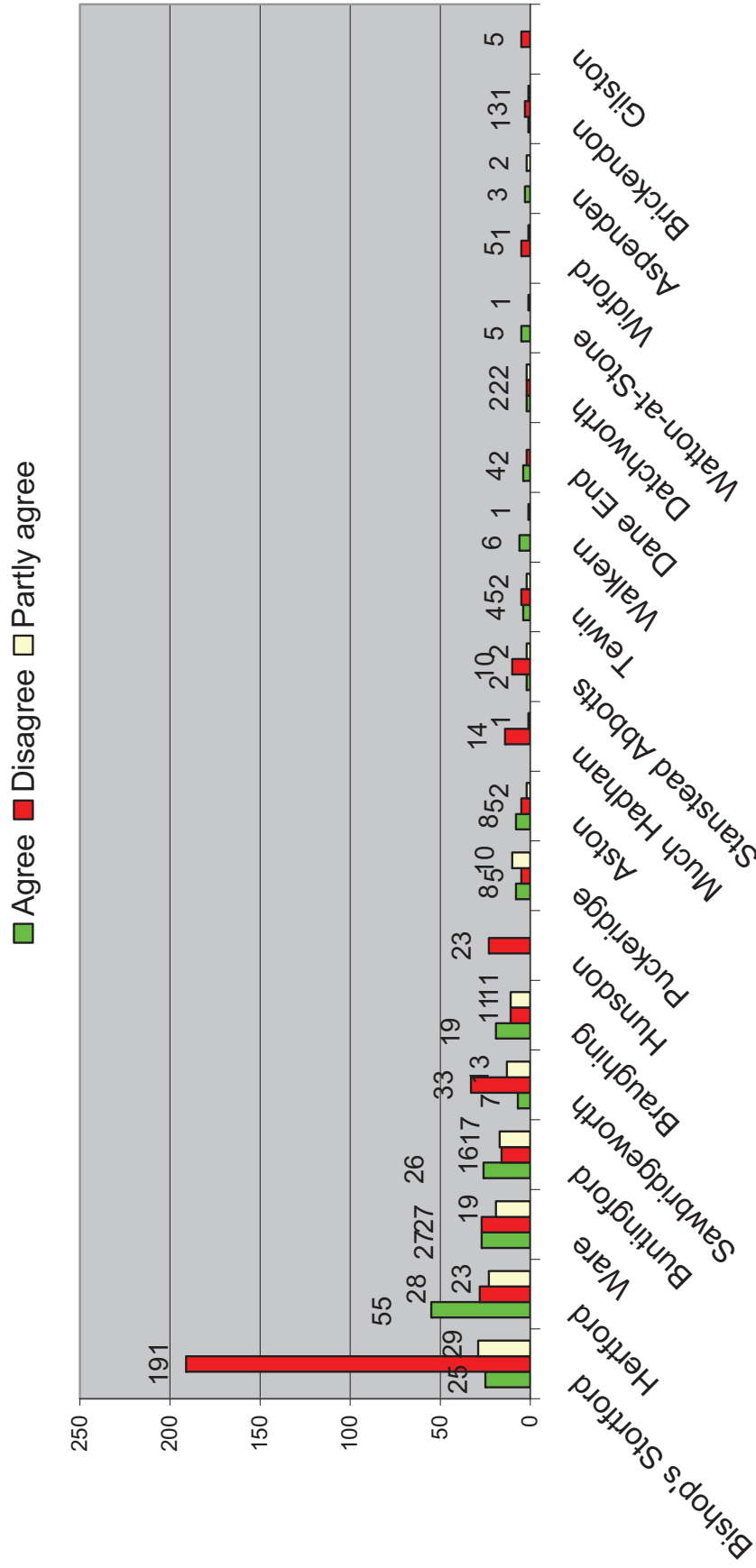
Q42 - Subject to whichever development strategy option we choose, do you agree with our emerging vision for the villages?



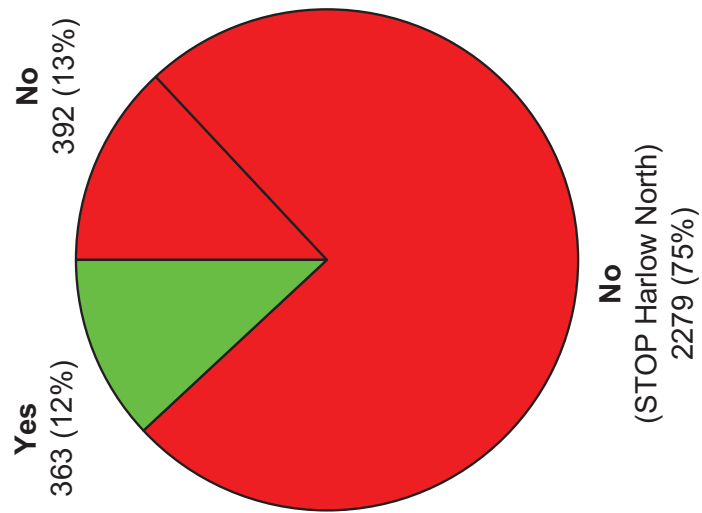
Q43 - Do you agree with the consultants Suggested Approach in respect of growth to the north of Harlow?



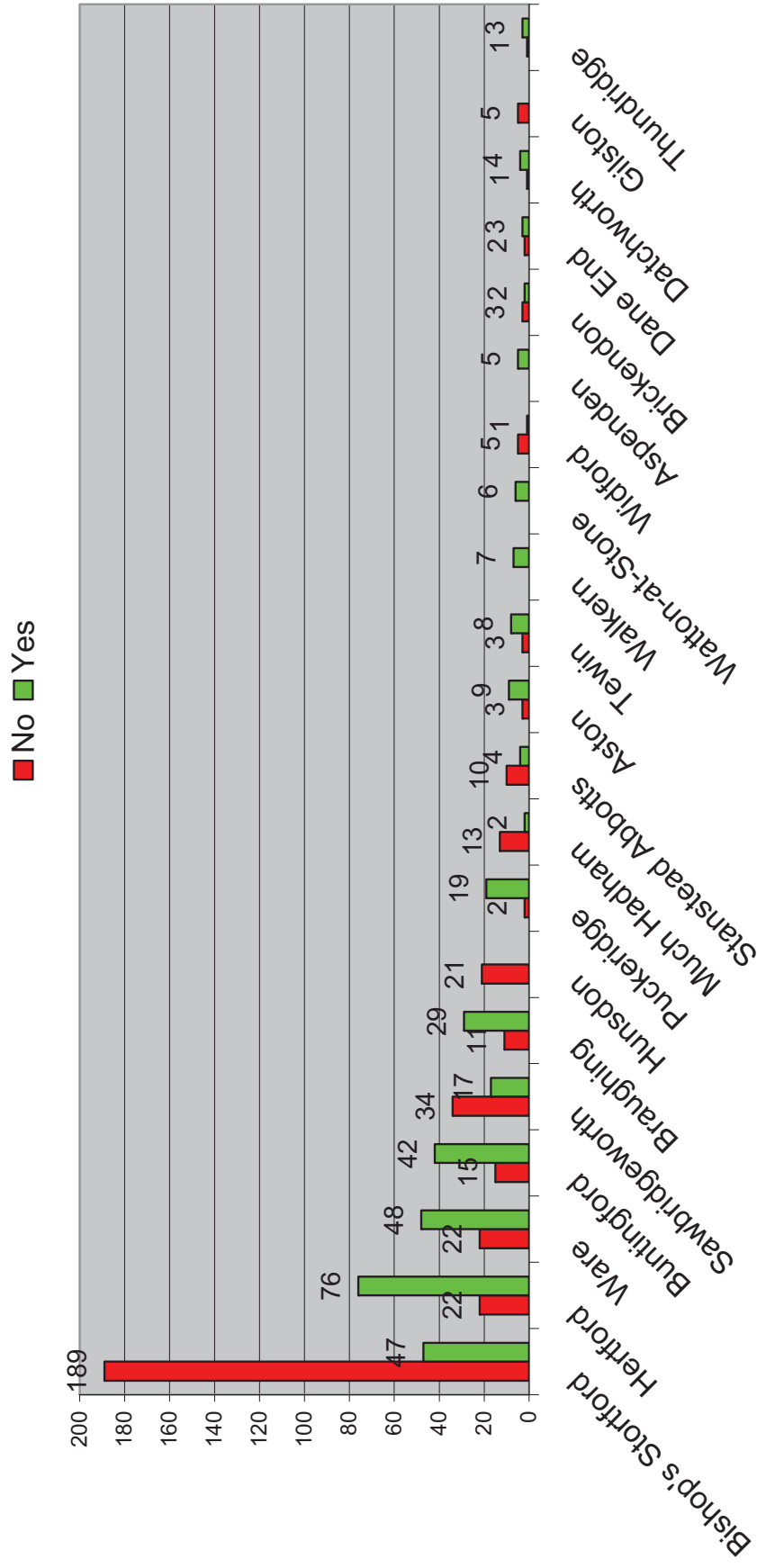
Q43 - Do you agree with the consultants Suggested Approach in respect of growth to the north of Harlow?
(Top 20 by point of origin - not including STOP Harlow North responses)



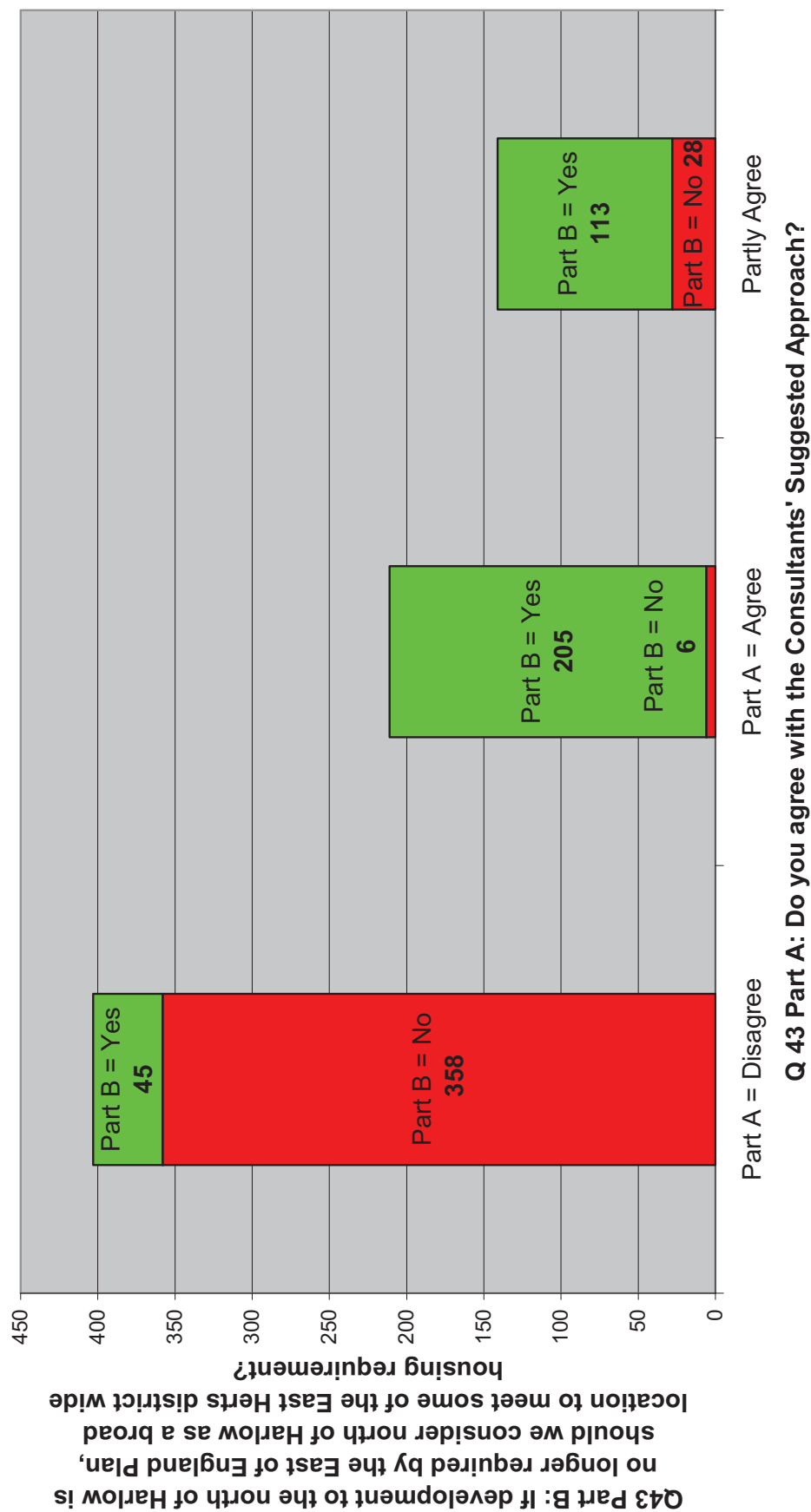
Q43 - Should we consider north of Harlow as a broad location to meet some of East Herts district wide housing requirement?



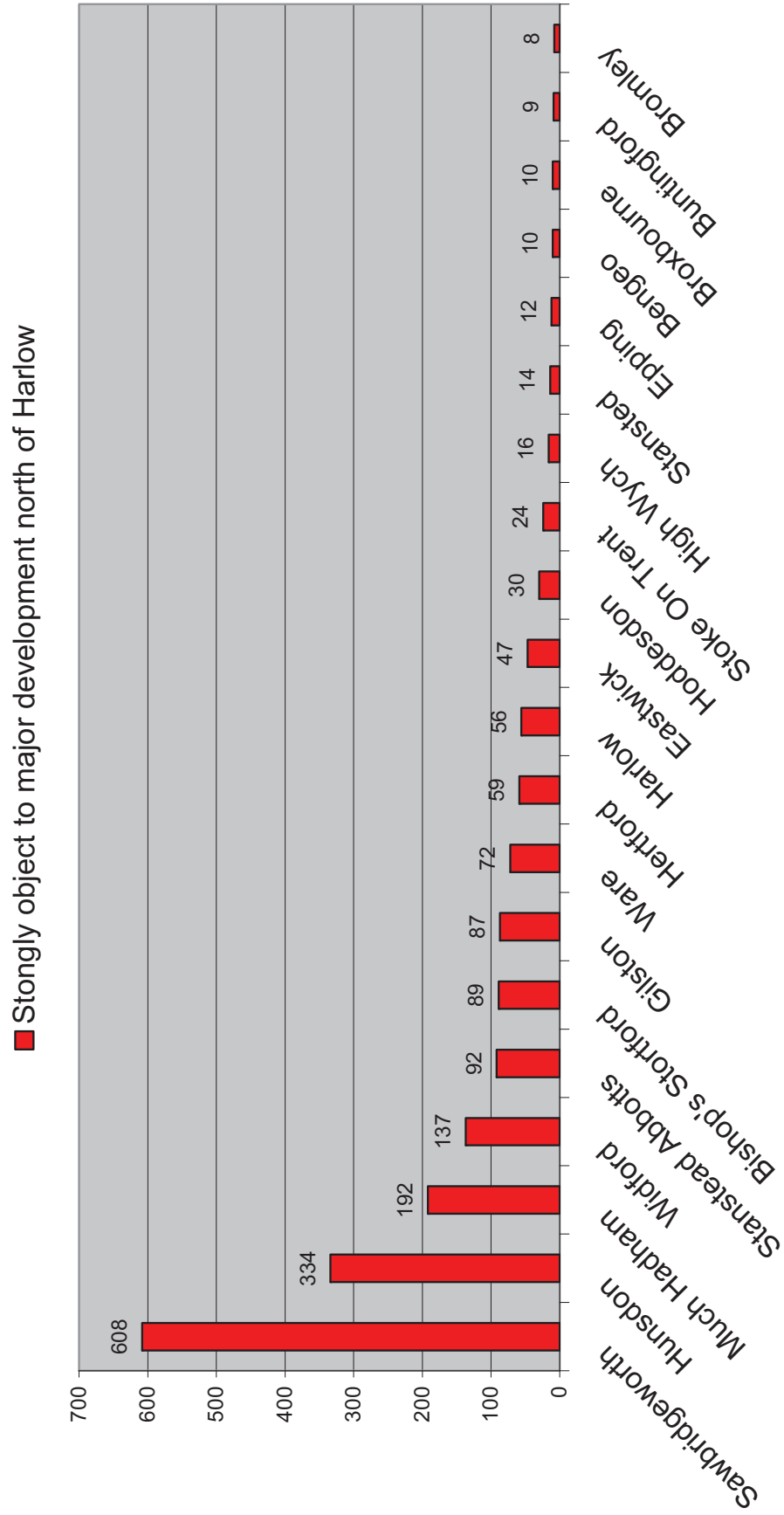
**Q43 - Should we consider north of Harlow as a broad location to meet some of East Herts district wide housing requirement?
(top 20 by point of origin - not including STOP Harlow North responses)**



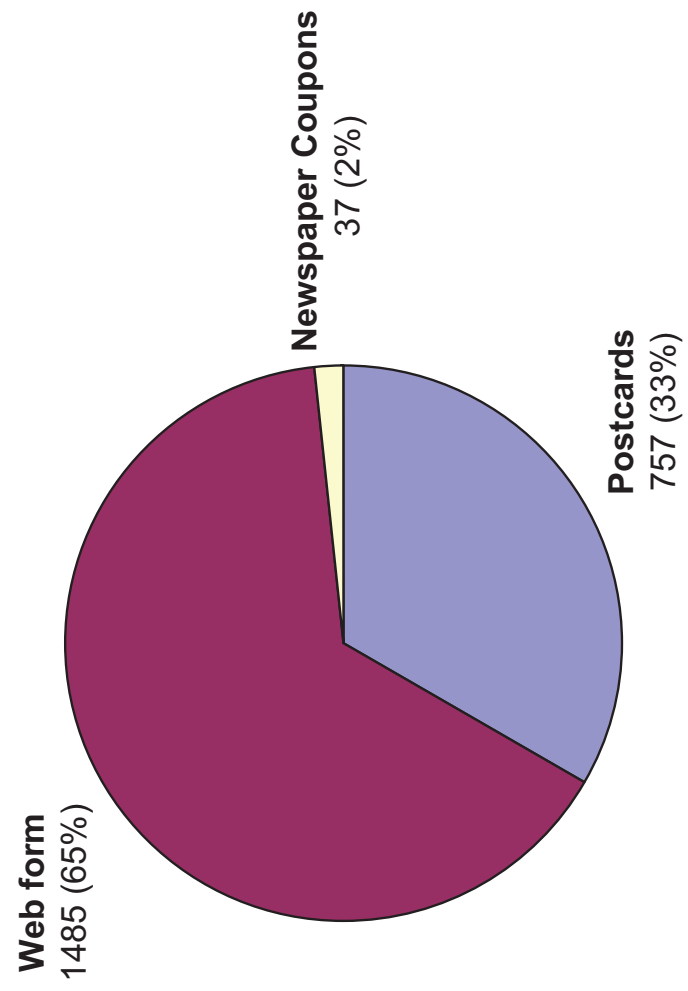
Comparison of responses to Q43 Part A and Q43 Part B



Q32 - STOP Harlow North Campaign Responses Top 20 by point of origin



Q43 - STOP Harlow North response by source



Consulation Windows Internet Explorer

http://www.stopharlownorth.com/response_5.htm#form

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File Edit View Favorites Tools Help

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East Herts / Harlow Local Development Framework; Issue and Option

East Herts Council has invited response on a number of questions, of which only one relates directly to the land north of Harlow. STOP Harlow North has prepared a response to that question as shown below. If you support that response, then please confirm as such in [the form at bottom of this page](#), add your details and click 'Submit'. Based on your response we will create a standard letter in your name which will be sent to East Herts Council.

At some stage Harlow Town Council will be conducting a parallel consultation on their Local Development Framework which might also include reference to Harlow North. If so and if appropriate, then we will respond in your name to express the same objections.

East Herts Question 43: Do you agree with the consultants' Suggested Approach in respect of growth to the north of Harlow? If not, how would you distribute development in accordance with Policy HA1 of the East of England Plan and why? If development to the north of Harlow is no longer required by the East of England Plan, should we consider north of Harlow as a broad location to meet some of the East Herts district wide housing requirement?

Harlow Question 26: What is your view on the consultant's Suggested Approach to accommodating growth around Harlow

1. I do not agree with the consultant's suggested approach in respect of growth north of Harlow. It was constrained by policy HA1 of the East of England Plan which has since been revoked. The consultants' own work indicates that, without that constraint, Option C is the preferred approach. The consultants' approach is unsustainable and will do untold economic and environmental damage.
2. There is no longer any need to distribute development in accordance with policy HA1 of the East of England Plan as the Plan has been revoked by the new Government. I support a better not a bigger Harlow.
3. The green fields north of Harlow are not suitable as a broad location to meet district wide housing requirements. The area should remain an essential part of (an extended) Green Belt
4. The towns and villages north of Harlow should be treated in the Local Development Framework no differently from other towns and villages of similar size and character in the district.
5. I support limited housing to meet local needs in accordance with locally developed parish and town plans
6. I strongly object to major development north of Harlow

I agree with (1) above	<input checked="" type="radio"/> Yes <input type="radio"/> No
I agree with (2) above	<input checked="" type="radio"/> Yes <input type="radio"/> No
I agree with (3) above	<input checked="" type="radio"/> Yes <input type="radio"/> No
I agree with (4) above	<input checked="" type="radio"/> Yes <input type="radio"/> No
I agree with (5) above	<input checked="" type="radio"/> Yes <input type="radio"/> No
I agree with (6) above	<input checked="" type="radio"/> Yes <input type="radio"/> No
Other comments	
Other comments (cont...)	
Other comments (cont...)	
Other comments (cont....)	
Your name	
Your address	
Your postcode	
Your email address	

[Cancel](#) [Click here to submit](#)

Please note You must supply a name, address and postcode for your response to be included in the public consultation. There is no such requirement to provide your email address, but if you do then we may be able to focus future reminders on those

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ESSENTIAL REFERENCE PAPER 'G': CHAPTER 1 - BACKGROUND AND CONTEXT

Question 1: Sustainability Appraisal

Do you have any comments on the Core Strategy Sustainability Appraisal?

72 people/organisations provided comments in relation to Question 1. These included:

- 27 Individuals
- 22 Developers/landowners/agents/businesses
- 15 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - East Herts Gospel Hall Trust
 - Environment Agency
 - Epping Forest District Council
 - Harlow District Council
 - Hertfordshire County Council – Environment
 - Hertford Gospel Hall Trust
 - Jehovah's Witnesses
 - Natural England
 - Parsonage Residents Association
 - Rivers Nursery Site & Orchard Group
 - RSPB
 - The Woodland Trust
 - Transition Hertford
- 8 Town and Parish Councils including:
 - Aston
 - Brickendon Liberty
 - Hertford Heath
 - Hertford Town
 - High Wych
 - Tewin
 - Thorley
 - Watton-at-Stone

Q1 - Summary Comment	Q1 - Detailed Comment
General support	<ul style="list-style-type: none"> • Welcome the 'whole plan' methodology adopted, including social and economic issues, including accessibility to education for all the community via all sources • Appears detailed and assesses appropriate topics. We expect it will become more detailed in later stages of the Core Strategy • NE generally supportive and does not dispute any conclusions • Despite being superseded by the revocation of the EEP it is still valuable for its data and reasoning on many aspects. • Welcome steps to a broader understanding of rural sustainability – not just reducing private car use but around social and economic issues
General objection	<ul style="list-style-type: none"> • SA too long and complicated, with information lost among the volume. • Some assumptions seem too simplistic • Questions over its strength and status or whether issues will be disregarded under developer pressure and government targets • Limited interrogation between the SA and HRA – therefore missed opportunity to ensure a thorough assessment of the Core Strategy's environmental affects. • Use of 'may' or 'could' lead to uncertainty. • Putting non-town settlements into categories does not work. • Level of understanding into rural accessibility is not sufficient
Missing factors SA should consider	<ul style="list-style-type: none"> • The impact of building more houses on Crime rates • No reference to designing out crime • Should be more forward-looking and consider the strategic issues and consequences of not providing sufficient housing post-recession such as affordability and socio-economic and environmental factors. Need to stabilise housing markets • Little recognition of the need to provide allotments and burial land • SA should appraise Approaches I, II and V and all future approaches • Agricultural land survey to ensure only lowest grade agricultural land is developed, thus protecting the best. • Contaminated land should not be avoided but cleaned up and reused. Should reference CL:AIRE Code of Practice • Need to take account of EA Source Protection Zones (SPZ1) designations and protect these zones from certain types of development • Minerals reserves not scoped or included - particularly potential sterilisation at potential development directions inc N Harlow • Significant mitigation measures for impact on water resources, river networks and transport modes have not been identified • Potential for freight transport via waterways should be discussed as a way of relieving congestion • Green Belt review not needed as part of EEP but should be done in conjunction with other housing/land allocation assessments
Infrastructure Issues	<ul style="list-style-type: none"> • If we cannot afford the infrastructure or development results in deterioration of assets and resources we should not build. • Infrastructure and increases in services should occur prior to house building • The lack of, or failure to provide infrastructure will determine whether and where houses will be built • Transport infrastructure is wholly inadequate for existing never mind new housing
Water infrastructure	<ul style="list-style-type: none"> • Issues around water and flood management – should seek to save, store and treat excess water to help resolve existing water scarcity issues and prevent exacerbation of issues through new development. • No recognition of the over-licensed or over-extracted status of existing water supplies in the area, which are harming ecology and biodiversity. Need an action plan and safeguarding policies to manage water infrastructure as a matter of urgency • Option E should not occur. EEP SA 2004 states Stevenage has a severe lack of available water resources due to over-extraction and poor ground water regime

Q1 - Summary Comment	Q1 - Detailed Comment
	<ul style="list-style-type: none"> • Need more local treatment of waste water to reduce loss of water flow to local rivers
Climate Change	<ul style="list-style-type: none"> • Section should be expanded to include delivering SUDs, flood prevention (including fluvial) and mitigation, sequential approach to land allocation (PPS25), low carbon energy infrastructure and energy efficiency and renewable technology plus reducing dependency on imported oil - "peak oil" issues – Sustainable Energy Security, Strategic Risks & Opportunities for Business (Lloyds of London) and Zero Carbon Britain 2030 (CAT). • Need to consider Hertfordshire Renewable and Local Carbon Energy Technical Study (July 2010) and refer to Climate Change Act 2008. • Should look towards more sustainable options of change including refurbishment of existing housing stock, creating harmony between environmental, social and economic needs. EH should be proactive in sustainability agenda acting as an exemplar, and should seek to shorten the distance between production and consumption. Part of the Big Society should include local self-sufficiency • Should assess the carbon emissions for EH and each of its settlements • Welcome reduction of emissions through sustainable construction. Consideration could be given to the type of heating system supplied
Wildlife / biodiversity Objectives	<ul style="list-style-type: none"> • Theme 8, GRE2 – too narrow an approach which lacks ambition. Change to: 'To protect and enhance designated wildlife sites, local biodiversity and promote networks of green infrastructure as a haven for wildlife as well as recreational amenity.' • Conflicts and incompatibilities between Strategic Objectives need to be resolved – the biodiversity and climate change objectives should not be compromised by housing development allocations. • Ancient woodland should be given absolute protection – 4.5% of EH covered by unique, valuable and threatened asset. • Traditional orchards are a priority habitat in the UK BAP and should be given greater protection • Revised BAP targets and consultation PPS on Natural and Healthy Environment need to be referred to. • Should consider the findings of the WWF report Riverside Tales, the Natural Environment and Rural Communities Act 2006. Should link better to Herts 2021 and EH SCS • Not enough emphasis on developing strategies to foster greater biodiversity, which affects global ecosystems more than carbon emissions • Options B, C and D are preferable because they provide the flexibility to incorporate GI features and avoid negative effects on biodiversity. • All possible mitigation measures highlight the devastating and unsustainable consequences for the habitats and character of EH • Green Belt philosophy should be maintained, GB particularly by Stevenage towards Aston, Walkern and Datchworth.
Faith and religion	<ul style="list-style-type: none"> • Support the Equality Impact Assessment in principle – identification of age, religion and or belief, equal provision for different faith groups and expand the facilities for worship and voluntary sector • Object to the screening out of religion and belief (Para 14.2.9) believe it is likely to result in the failure to make adequate provision for new places of worship. • Faith is an important contributor to wellbeing
Community/ social	<ul style="list-style-type: none"> • Welcome recognition of age as a key issue • Welcome stakeholder engagement undertaken, urge for more with disengaged groups and voluntary groups to ensure final plan is sound. • Consultation omits consideration of social issues such as rising costs of transport and living, ageing population, pressure towards centralising services – will lead to residents being trapped in their homes and a flight from village to town • Welcome recognition of education as a key factor of wellbeing and part of providing inclusive communities. SA and Core Strategy should embrace private education

Q1 - Summary Comment	Q1 - Detailed Comment
	providers
Bishop's Stortford Growth Options – pro development	<ul style="list-style-type: none"> • Bishop's Stortford- does not assess small GB releases (i.e. school sites), which would not jeopardise the purpose and function of the GB. • ASRs should be considered for development in the event an application is not forthcoming prior to the adoption of the CS.
B.S. Anti Option 2 (north east)	<ul style="list-style-type: none"> • Contains Birchanger Wood – “a place of quality” a “lung” to be preserved in perpetuity (Woodland Commission)
Buntingford Growth Options	<ul style="list-style-type: none"> • Scott-Wilson's comments lack vision and misread landscape impacts of developing to the east • Homes and jobs should be in balance
Hertford Growth Options	<ul style="list-style-type: none"> • Conflicts between consultant's tentative views and assertions in the I&O (6.3.26 I&O and 9.3.6 SA). • growth direction labels are incorrect • Option A, E and F are stated as positive for Hertford-Ware area but this takes no account of the negative impact of a moratorium of development on Hertford Heath as a larger service village
Hertford – pro Option 1 (built up area)	<ul style="list-style-type: none"> • Should be preferred • Avoid Green Belt development
Hertford – Pro Option 2 (West)	<ul style="list-style-type: none"> • Should be preferred • There is adequate PT networks so development should not add too much private car use. Both stations could be walked to from here
Hertford – anti Option 3 (north)	<ul style="list-style-type: none"> • Omits mention of green fingers, nature reserves, river networks and issues of traffic congestion and terrain
Hertford – Pro Option 4 (south)	<ul style="list-style-type: none"> • Would not create coalescence if to the west of Brickendon Lane. Sites to the south are well-connected and accessible and close to a secondary school. • Least damaging of Green Belt development options
Hertford – anti Option 4 (south)	<ul style="list-style-type: none"> • Would cause coalescence between Hertford and Hertford Heath
Sawbridgeworth /High Wych Growth Options	<ul style="list-style-type: none"> • Growth options score are inconclusive for all directions. • Does not acknowledge that all sites proposed are on Greenfield sites which it considers as negative. • All options could be made more acceptable by ensuring links to existing transport system
Sawbridgeworth – anti Option 1	<ul style="list-style-type: none"> • Stated as most sustainable apart from effect on Rye Meads and historic environment • Option 1 takes no account that it is undeliverable – no sites left without contamination or viability issues and would lead to increased congestion.
Sawbridgeworth – pro Option 2	<ul style="list-style-type: none"> • Option 2 would use least quality (Grade III) agricultural land. • If no Harlow North then Option 2 could be delivered with no coalescence, otherwise coalescence would occur • Option 2 is highly accessible though they must ensure proposals incorporate strong links to transport system.
Sawbridgeworth – anti Option 2	<ul style="list-style-type: none"> • High Wych – dispute findings of Table 24 – options 2 and 3 would have significant negative effects on High Wych.
Sawbridgeworth – Pro Option 3	<ul style="list-style-type: none"> • Option 3 is the best – Rivers Nursery site redevelopment (see Call for Sites submission). Assessment too narrow in dismissing transport related attributes of west of Sawbridgeworth. Should score positive and negative rather than major significant effects. • Developers maintain that ecology issues have been addressed at the site. Biodiversity issues would need assessing. • Would not cause coalescence with Harlow or High Wych • If providing a mixed use development of Hospital improvements, retirement and residential properties, open space, allotments and nature reserve should score positive on community and wellbeing, economy and employment, historic

Q1 - Summary Comment	Q1 - Detailed Comment
	environment and housing.
Sawbridgeworth – anti Option 3	<ul style="list-style-type: none"> Option 3 and 4 would cause the loss of Grade II (good) agricultural land,
Sawbridgeworth – anti Option 4 (<ul style="list-style-type: none"> Option 4 would cause coalescence with Bishop's Stortford Through traffic in Sawbridgeworth is the main cause for congestion and should not be allowed to influence decisions relating to the potential development of Sawbridgeworth itself (i.e. Rivers Nursery)
Ware – Pro Option 2 (north)	<ul style="list-style-type: none"> Large urban extension might reduce the gap between Ware and Wareside and Thundridge but would not cause coalescence as a significant green wedge would remain. Advocated in call for sites submissions
Ware - Pro Option 3 (east)	<ul style="list-style-type: none"> Might reduce the gap between Ware and Wareside but would not cause coalescence. Advocated in call for sites submissions Dispute SA stating there would be an impact on an open space, as this site is under-utilised and proposals would be to enlarge and improve this site. Lack of evidence on the potential impact on the rural economy due to loss of agricultural land. Purchase of the land would provide the landowner with money to invest in his business.
Ware – anti Option 5 (south west)	<ul style="list-style-type: none"> Dispute SA stating this would have a positive effect on employment as part of this land that would be developed is a golf course
Impact on villages and rural area - pro development	<ul style="list-style-type: none"> SA does not address the impacts of moratoriums on villages through Options A, E and F. Preventing development in the villages would only increase the effects of dormitory settlements - lack of affordability and lack of employment opportunities – forcing out-commuting, resulting in further loss of social networks and economic prospects for village services. Growth in villages (particularly larger service villages) would facilitate self-containment, accessibility to services, capture planning gain, prevent the need for agricultural diversification to provide economic opportunities regardless of their rural locations Dispute SA Options A and E would restrict growth in total areas but Option B would have a positive impact on High Cross as it directs growth to larger service villages If no Harlow north, Hunsdon could be developed Dispute SA 6.2.3 and 6.2.4 stating development in villages along A1M corridor would increase car use. Illustrates unsuitability of categorising villages by size rather than individual circumstances and geographic environment Villages close to larger settlements (Walkern to Stevenage) should be considered as reasonable alternatives for housing and employment development as they are more likely to have access to public transport networks and options such as car-sharing etc Does not appear to differentiate between smaller rural settlements and larger service villages except in transport terms. Smaller villages should ensure development is tailored to their needs, not say no to development entirely We should ask how will development add to or diminish the sustainability of this community. (Taylor Report) Particularly for housing, affordable housing and economic development, which should be assessed individually SA is too narrow in terms of the rural economy – affordable housing being linked to the needs of rural businesses through allowing seasonal agricultural worker accommodation – there is more to rural economy than agriculture Village location should not hamper business development, also applicable to larger businesses moving out of the district
Impact on villages – against development	<ul style="list-style-type: none"> Development in villages does not halt the decline of village services, just increases mileage by private car. Report under-estimates development effects on rural areas Does not appear to differentiate between smaller rural settlements and larger service villages except in transport terms.

Q1 - Summary Comment	Q1 - Detailed Comment
	<ul style="list-style-type: none"> SA does not address impacts of development options on the small service or other villages. Not an accurate assessment. Brickendon should be classified as an "other village" rather than "small service village" due to no services and weight restrictions on roads
Pro- Harlow	<ul style="list-style-type: none"> Does not consider the socio-economic and infrastructure advantages of developing north of Harlow at different levels of growth – Harlow's regeneration etc, rather than focussing simply on the negative environmental impacts. Should consider the implications of locating strategic development elsewhere which EH could not gain from before appraising Does not address the opportunity to build upon existing infrastructure located at Harlow, less of an impact on congestion and sustainable travel modes than other options. All response from Harlow District Council – joint benefits, inter-dependency, duty to co-operate etc.
Anti Harlow	<ul style="list-style-type: none"> Any development N of Harlow cannot be positive for sustainable transport and affordable housing.
Spatial Areas Approach	<ul style="list-style-type: none"> Not appropriate as it generalises issues facing these areas, which are not necessarily applicable to all the locations within them. E.g. Thundridge which is a rural area village but relates to Ware also and Spellbrook vs. Bishop's Stortford and Sawbridgeworth. Villages located within the urban spatial areas are effected by issues facing the rural area as much as the urban Each option has a different impact on each spatial area, sometimes contradictory
General	<ul style="list-style-type: none"> Wherever you build homes people will use their car even for short distances. There seems to be a presumption that if you live in a town you will behave differently to someone who lives a short distance away.

Comments received to Q1 in respect of other Chapters

Chapter 3: Development Strategy

Q1 - Summary Comment	Q1 - Detailed Comment
Revocation of RSS	<ul style="list-style-type: none"> Will need to be revised in the light of the Government's intention to revoke the East of England Plan – major developments (Stansted Airport and Harlow), housing targets and evidence Housing requirements should be based on bottom-up approach informed by issues raised in SA and HRA and evidence base
Alternative Options - Against development	<ul style="list-style-type: none"> Question need for 8,500 dwellings and per annum calculation Based on flawed assumption that more homes are needed. One option should be not to build at all. Not building north of Harlow should be a reasonable alternative and should undergo SA process Para 6.1.1 should state that there are no alternatives if this is the case and give the reasons
Alternative Options for development	<ul style="list-style-type: none"> Using existing housing/accommodation that is vacant/under-utilised in all sectors. Small-scale GB releases in locations other than main directions of growth are a reasonable alternative to be assessed. Should appraise alternative housing/employment growth levels and all potential directions for growth around settlements/Harlow. Confine all developments to the towns to protect rural ambience. SA shows that it should not be assumed development should occur in towns at all. Towns should be looked at individually to see where development can be allowed Development outside towns should be determined by suitable site availability and the need to avoid coalescence with regard to transport and utility provision Development should be concentrated on smaller villages rather than towns to regenerate populations/services etc. Concentrating development in just the towns would have a detrimental impact on small villages Stevenage should be classed as a town for the purposes of development strategy options and included in Options A-D Approach when assessing negative impacts – biodiversity, air quality, flood risk and historic environment - is not consistent throughout. Dispersed options are not considered fully enough in terms of potential wider impacts, viewed collectively Villages close to larger settlements should be considered as reasonable alternatives for housing and employment development as they are more likely to have access to public transport networks and options such as car-sharing etc Local food production should be considered as a way of increasing sustainability of local economy and should drive council's approach to development by capitalising on local food initiatives
Most sustainable development location	<ul style="list-style-type: none"> Adjacent to towns and on brownfield sites People will still obtain jobs that require travel. By limiting expansion in few areas the effects of increasing vehicle movements could be minimised by targeted investment in public transport. Distributing development wider makes this more difficult. Option C provided affordable housing is provided for local people near to their support structure – although SA over-simplifies with no negative scores Development Strategy Option C has least negative effects East of WGC – a sensitive, thoughtfully master-planned urban extension would not have the impacts stated, dispute disproportionate negative impacts on the areas' few historic features too much emphasis on the negative effects of Option E
Lacking evidence	<ul style="list-style-type: none"> Where is the evidence of current positions, housing stock, population, transportation plans, approved applications etc. No reference to local aspects of the development plan, Hertfordshire LTP and

Q1 - Summary Comment	Q1 - Detailed Comment
	UTPs
	<ul style="list-style-type: none"> • Assessments and conclusions should be sourced to evidence base or to consultant's views as appropriate.
	<ul style="list-style-type: none"> • Deficient on evidence of the historic environment
	<ul style="list-style-type: none"> • Statements like 11.3.13 should be omitted unless justified by tabular/numerical evidence – impact on rural economy

Question 2: Habitats Regulations Assessment

Do you have any comments on the Core Strategy Habitats Regulations Assessment?

24 people/organisations provided comments in relation to Question 2. These included:

- 9 Individuals
- 1 Developer/landowner/agent/business
- 9 Stakeholders/organisations including:
 - Buntingford Civic Society
 - Environment Agency
 - Epping Forest District Council
 - Hertfordshire Biological Records Centre
 - Natural England
 - Rivers Nursery Site & Orchard Group
 - RSPB
 - The Woodland Trust
 - Transition Hertford
- 5 Town and Parish Councils including:
 - Aston
 - Braughing
 - Hertford Town
 - Thorley
 - Walkern

Q2 - Summary Comment	Q2 - Detailed Comment
General support	<ul style="list-style-type: none"> • Appropriate scope and detail • Natural England agrees with conclusions – need to remove reference to EEP
General objection	<ul style="list-style-type: none"> • Found very difficult to understand and in turn, respond to. • Approach taken is inadequate. Refer to Respondent 68 comments to Question 1 • HRA does not offer any mitigation • The whole district is not covered / too much focus on area south of A1170 • Alternative prediction supplied – 475 dwellings per year. • Not enough information or clarity in the Core Strategy to allow conclusions to be reached • Query whether consultation was undertaken with stakeholders rather than visitors
Ecology and habitats	<ul style="list-style-type: none"> • Must support work of HMWT to ensure biodiversity is maintained and enhanced, that population of EH have access to natural world and is encouraged to actively participate in its enjoyment and care for it • Need to identify areas or sites for the restoration and creation of habitats. • New developments should provide accompanying open spaces with a variety of habitats and should protect and enhance existing sites, including on site hedgerows and trees. • Native hedgerows and mature trees are lost through development site clearance to maximise developable site area • There should be an onus on developers to prove that developments cause no significant harm.
Impacts on European Sites and Species	<ul style="list-style-type: none"> • If more local sites were raised to SAC (or similar) standard this would reduce car journeys and ease visitor pressure on existing vulnerable sites. • European Protected Species and Habitats Directives sites such as Lee Valley SPA and RAMSAR site and Epping Forest SAC are particularly vulnerable to effects from development including harm to air quality through increased vehicle movements and the effects of eutrophic of water quality. • Need careful consideration of demand management policies and the impacts of the different development strategies to prevent further harm from development • Need to refer to the protection of European Protected Species under the Habitats Regulations
Protection of Local Sites	<ul style="list-style-type: none"> • Sites of local and wildlife importance should be given more representation and protection. Including Hertford Green Fingers for example and traditional orchards
Monitoring	<ul style="list-style-type: none"> • Monitoring and management of sites is needed including schemes to encourage local stewardship. • Surveys need to be undertaken at the correct time of year to ensure full representation of species presence and behaviour.
Reinstatement of contaminated land	<ul style="list-style-type: none"> • Waste and all other developments should be designed to protect and enhance local biodiversity, including through cleaning and reinstating contaminated sites. Need to restore where countryside has been damaged in the past. • Once neighbouring authority proposals are confirmed we will need to assess these cumulatively.
Waste sites	<ul style="list-style-type: none"> • Disagree with energy from waste – new technology for waste plants mean they cannot harm local air supplies. Over a wider area they improve air quality as they reduce miles travelled by waste containing vehicles and reduce landfill emissions. • Waste developments should be designed to protect and enhance local biodiversity – refer to Habitats Directive
Climate change	<ul style="list-style-type: none"> • CC adaptation must be given a higher prominence in policy as CC mitigation can only go so far in preventing impacts • Effects of CC are showing in natural world – changing plant leafing/growth periods and resultant impacts on migratory birds and woodland species – flora and fauna
Need to manage water quality	<ul style="list-style-type: none"> • New water/sewage infrastructure needs to be built prior to development to protect vulnerable water courses from the effects of pollutant build up – damaging ecology – Lee Valley SPA particularly vulnerable • Issues of water scarcity and sewerage treatment capacity will be exacerbated by

Q2 - Summary Comment	Q2 - Detailed Comment
	<p>climate change in addition to development rates</p> <ul style="list-style-type: none"> • Water Framework Directive now includes stricter water quality targets that need to be complied with.
Need to manage water resources / habitats	<ul style="list-style-type: none"> • All development options will increase pressure on water resources. Reduction in river flows cause significant harm to ecology of wetland environments, particularly downstream of extraction site. • Insufficient water supplies to support 8,500 dwellings – especially with climate change forecast • Impact of North of Harlow on water availability and quality at Lea Valley RAMSAR
Water consumption	<ul style="list-style-type: none"> • Need to be more specific as to how we will reduce water consumption including sources of evidence • Failure of water abstraction policies and programmes not being rectified by providers and regulators
Woodland habitats	<ul style="list-style-type: none"> • Climate change and increasing tourism/disturbance harming woodlands. Prime areas need to be protected through woodland creation projects to increase core areas and make them more sustainable. • Refer to Space for Nature (Woodland Trust) • Disconnected nature of woodland areas harming their potential to adapt. Being 'locked-in' by hostile surroundings causing changes to the species variety of semi-natural habitats and loss of ancient woodland • LDF should explore the potential to encourage buffering of agricultural land and woodland edges as a means of agricultural diversification and habitat buffering – Defra's Entry Level Scheme Guide Book.
Existing over-development	<ul style="list-style-type: none"> • Any further development will only exacerbate existing issues, creating an environment that is unsustainable.

Comments received to Q2 in respect of other Chapters

Chapter 2: Background and Context

Q2 - Summary Comment	Q2 - Detailed Comment
Theme 1	<ul style="list-style-type: none">For renewables, the biggest impact is changes in electrical distribution routes, not just the new generation installation

Chapter 3: Development Strategy

Q2 - Summary Comment	Q2 - Detailed Comment
East of England Plan	<ul style="list-style-type: none">Housing numbers and scope of HRA need to be revisited (post revocation of EEP) and consider local housing lists and local predictions of housing need

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

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

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

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

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

Q3 - Summary Comment	Q3 - Detailed Comment
development	need for travel.
	• Does not mention home working or working at local employment hubs
	• Reduce emissions by locating growth where non-car access is possible, such as in urban extensions

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

Q3 - Summary Comment	Q3 - Detailed Comment
Themes	• All Strategic objectives need to address context, such as cross-boundary issues and LSCP corridor

Comments received in respect of Q3 relating to other Chapters

Chapter 3: Development Strategy

Q3 - Summary Comment	Q3 - Detailed Comment
Development Strategy	• No need for more houses; no garden grabbing
	• Growth options will undermine climate change objectives

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comments received to Q6 in respect of other Chapters

Chapter 3: Development Strategy

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

Question 7: Theme 3: LDF Strategic Objectives (Housing)
Have we got the LDF strategic objectives for Theme 3 correct?

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

- 43 Individuals
- 34 Developers/landowners/agents/businesses
- 14 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - East of England Development Agency
 - Epping Forest District Council
 - Harlow Council
 - Harlow Renaissance
 - Hertfordshire County Council – Environment
 - Hertford Civic Society
 - Hertfordshire Association of Parish and Town Councils
 - Hertfordshire Biological Records Centre
 - Homes & Communities Agency
 - National Grid Property Holdings Ltd / National Grid Gas
 - The Ware Society
 - Transition Hertford
- 14 Town and Parish Council including:

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

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

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

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

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

Comments received to Q7 in respect of other Chapters

Chapter 3: Development Strategy

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

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

Chapter 9: Villages

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

Chapter 10: North of Harlow

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

Question 8: Theme 3 Policy Options (Housing)

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

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

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

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

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

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

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

Question 9: Theme 4 LDF Strategic Objectives (Character)

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

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

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

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

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

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

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

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

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

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

Comments received to Q9 in respect of other Chapters

Chapter 3: Development Strategy

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

Chapter 9: Villages

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

Chapter 10: North of Harlow

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

Question 10: Theme 4 Policy Options (Character)

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

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

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

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

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

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

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

Comments received to Q10 in respect of other Chapters

Chapter 3: Development Strategy

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comments received to Q13 in respect of other Chapters

Chapter 1: Background and Context

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

Chapter 3: Development Strategy

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

Chapter 5: Buntingford

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

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

Chapter 9: Villages

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

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

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

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

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

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

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

Comments received to Q14 related to other issues in Chapter 2

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

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

Comments received to Q14 related to other Chapters

Chapter 1: Background and Context

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

Chapter 3: Development Strategy

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

Chapter 9: Villages

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

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

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

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

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

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

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

Chapter 3: Development Strategy

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

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

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

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

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

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

Comments received to Q16 related to other issues in Chapter 2

Q16 - Summary Comment	Q16 - Detailed Comment
Theme 4: Character	<ul style="list-style-type: none">• Support for Strategic Objectives CHA 1-4
Theme 7: Health, Wellbeing & Play	<ul style="list-style-type: none">• Existing Local Plan LRC1 allocations should not prevent land being considered for a broad location of growth in the Core Strategy

Comments received to Q16 related to other Chapters

Chapter 3: Development Strategy

Q16 - Summary Comment	Q16 - Detailed Comment
Green Belt	<ul style="list-style-type: none">• East Herts should plan development without impacting on the Green Belt

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

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

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

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

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

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

Comments received to Q17 in respect of other Chapters

Chapter 9: Villages

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

Question 18: Theme 8 Policy Options

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

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

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

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

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

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

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

Issues received to Q18 in respect of other Chapters

Chapter 3: Development Strategy

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Question 21: LDF Vision

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

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

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

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

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

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

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

Comments received to Q21 in respect of other Chapters

Chapter 3: Development Strategy

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

Chapter 5: Buntingford

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

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 Abbots
 - 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

Q22 - Summary Comment	Q22 - Detailed Comment
	<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

Q22 - Summary Comment	Q22 - Detailed Comment
	<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

Q22 - Summary Comment	Q22 - Detailed Comment
	<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?

Q22 - Summary Comment	Q22 - Detailed Comment
	<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
	<ul style="list-style-type: none"> • Easily accessible to existing services and higher levels of concentration will allow more efficient provision of new services
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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

Q22 - Summary Comment	Q22 - Detailed Comment
	<p>specific requirements</p> <ul style="list-style-type: none"> • “Natural development” in villages still required • No support for additional housing in village in Parish Plan Survey - therefore Option A is only choice • If development is necessary • 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 - Object	<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 A - Comments / alternate approaches	<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 - Support	<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
Option B - Object	<ul style="list-style-type: none"> • Excessive concentration in towns

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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 • 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
Option B - Location Specific	<ul style="list-style-type: none"> • 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

Q22 - Summary Comment	Q22 - Detailed Comment
	<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
	<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
Option C - Specific Location	<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
	<ul style="list-style-type: none"> • Add infrastructure stress but will increase accessibility. Town roads already congested and may reach peak unless people switch to other modes/smarter choices
	<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
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
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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)
	<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 <ul style="list-style-type: none"> • 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

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	<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

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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
	<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)	“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”
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 Assume 8,500 is based on East Herts estimation of housing need and not cancelled East of England Plan 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 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 Use spaces for infilling first 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 HCA Study results not been utilised for consultation - which is misleading especially since it gives radically different results to Call for Sites 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 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?
	<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
	<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
	<ul style="list-style-type: none"> 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
	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
Theme 3: Housing East Herts		<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
		<ul style="list-style-type: none"> 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
Theme 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
		<ul style="list-style-type: none"> Reference to Stanstead Abbots having frequent bus services is not a fair assessment since there is no Sunday service and services on other days are limited to hours of 6am to 7pm. As such it is highly impractical to reach major towns such as Stevenage, Welwyn, Watford or Bishop's Stortford by public transport and not possible to reach Harlow or Waltham Cross outside limited hours
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
	<p>accommodating the required growth</p> <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) • Review Green Belt to south of Bishop's Stortford to enable town to grow to 2031 • 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 • 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 • Good transport links • 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 • 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 expend 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 • High Cross (Puller Memorial) - places available. Development that would

Q22 - Summary Comment	Q22 - Detailed Comment
	increase number of pupils at the school would be welcomed. Some deficiency in built development that could be addressed through S106
	<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
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • Wareside - takes children from village and local area. Capacity not a constraint to limited development in village
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • Widford - takes children from village and local area. Capacity not a constraint to limited development in village
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • Tewin - additional development will require additional capacity
	<ul style="list-style-type: none"> • Tonwell - enough children in village to fill the school in reception but many travel out of village to Ware and Hertford
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • Aston - takes children from both the village and the local area. Capacity would not constrain limited development in village
	<ul style="list-style-type: none"> • Benington - takes children from both the village and the local area. Capacity would not constrain limited development in village
Villages - First Tier Education	<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).
	<ul style="list-style-type: none"> • Build satellite hamlets around the towns - not joined or big but self supporting and separated by green spaces
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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)
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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.
	<ul style="list-style-type: none"> • Increase villages by 20%+ to save schools, village halls and pubs
	<ul style="list-style-type: none"> • Infill and protect village boundaries especially Category 1
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • Larger and smaller service villages need more facilities (schools, medical centres, shops etc)
	<ul style="list-style-type: none"> • Consider new small developments in a range of villages alone
	<ul style="list-style-type: none"> • Built in small developments (5-10 properties) spread across the district with each area looked as so as not to negatively impact on countryside, economy, congestion, way of life, current residents
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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 • 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 • 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
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • Stanstead Abbots & St Margarets should be classified as a main settlement
	<ul style="list-style-type: none"> • 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?
	<ul style="list-style-type: none"> • Larger settlements typically offer best opportunities for sustainable development but must combine with land availability.
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • East of Stevenage existing sustainable location for growth - existing urban areas best equipped to accommodate growth
	<ul style="list-style-type: none"> • developing outside Rye Meads catchment area
	<ul style="list-style-type: none"> • Prevent destruction of countryside - restrict to near M25 and M11, only brownfield sites

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ESSENTIAL REFERENCE PAPER 'J': CHAPTER 4 - BISHOP'S STORTFORD

Question 24: Growth Options for Bishop's Stortford

Please rank the growth options for Bishop's Stortford in order of preference, and comment on their suitability. Are there any other options we have not considered?

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

- 315 Individuals
- 7 Developers/landowners/agents/businesses
- 11 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Environment Agency
 - Epping Forest District Council
 - Essex Country Council – Environment, Sustainability and Highways
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council – Passenger Transport Unit
 - Parsonage Residents Association
 - Stop Stansted Expansion
 - Thames Water Property Services
 - Thorley Manor Residents Association
 - Uttlesford District Council
- 6 Town and Parish Councils
 - Birchanger Parish Council (Essex)
 - Bishop's Stortford
 - Farnham Parish Council (Essex)
 - Stansted Parish Council (Essex)
 - Thorley
 - Walkern

Q24 - Summary Comment	Q24 - Detailed Comment
BS Civic Federation Standard response	<ul style="list-style-type: none"> • “In the case of Bishop’s Stortford, none of the options is suitable. The strategy proposals for at least 4,000 homes, with most on the Area of Special Restraint, is unacceptable” (145) • None of the options is suitable (non-standard response)
Option 1 Comments	<ul style="list-style-type: none"> • Support growth option 1. • Certain areas of Option 1 fall within Flood Zones 3 and 2. Incorporate reliance measures; • Restrict surface water run-off to green-field rates; 8m river buffer • Options 2-5 are in Flood Zone 1 but SUDS and 8m buffer strip should be incorporated. • Options 2 and 5 are supported as they are contained within the A road network surrounding Bishop’s Stortford • Need to speak to Thames Water about implications of development scenarios • Need to refer to Old River Lane site in the Core Strategy • Option 1 likely to be unsuitable due to lack of land • Option 1 – take care not to build on open spaces/green space
Option 2 Comments	<ul style="list-style-type: none"> • Support Option 2 for employment because of its highly accessible location. E. Herts and Uttlesford should work together on this site. • Threat to Birchanger Wood from Option 2 • Threat to character of Birchanger village from Option 2 • Object to Options 2 and 4, which lie outside East Herts and are within the Uttlesford Local Planning Authority area. • Option 2. Whilst the site is located in Uttlesford District, due to its proximity to Bishop’s Stortford town centre and its retail parks (and existing employment allocations) , it is considered that the proposals are of equal if not greater relevance to Bishop’s Stortford and East Herts as a district, although of course it of course it would also be of considerable benefit to Uttlesford being an employment use along the A120 corridor. • Option 2 Supported: A new employment provision within Stansted Road would assist the delivery of the work/homes balance and the creation of a sustainable settlement. • Option 2 supported – extremely accessible from the A120 and M11 such that it would be highly attractive to commercial occupiers • Option 2 – site capacity estimated to provide for around 1,500 new jobs. The site is supported by the East Herts Employment Land and Policy Review (October 2008) and could help to address the identified critical shortage of employment land in the town. • Option 2 – development of this option would help to meet the ‘challenging’ ambitions for job creation in the district set out in paragraph 3.4.6 of the issues and Options consultation document • Option 2 is a prime example of how collaborative working with neighbourhood authorities to maximise economic benefits, as stated in paragraph 3.4.13 of the Issues and Options consultation document. • Option 2. Green belt aims would not be undermined as A120 is a firm, defensible boundary. • Option 2 is in the ownership of a single landowner and is highly deliverable.
Option 3 Comments	<ul style="list-style-type: none"> • Option 3 area of surplus land west of the golf course would not be visible from or physically adjoining the M11. • Option 3 west of golf course would not extend urban sprawl into the countryside, and would help to support the golf club • Option 3 would increase congestion at M11 Jnct 8 and B1383, which links numerous Uttlesford villages. • Option 3 meets all the criteria for the development strategy set out in paragraph 3.7.8 of the issues and options consultation document.

Q24 - Summary Comment	Q24 - Detailed Comment
Option 5 Comments	<ul style="list-style-type: none"> Option 5 landscape impact affecting the setting of the town.
Options Comments	<ul style="list-style-type: none"> Danger of coalescence with Sawbridgeworth from Options 4 and 5. Concerns about visual impact from M11 of options 3 and 4. Noise and pollution near M11 Fill space west of M11 subject to topographical restrictions. Aircraft noise – Options 3, 4 and 5, not just Option 5. Avoid development in areas over 60 dBA Leq. Option 5 should be under 60, whereas options 3 and 4 would be over 60. 1, 3 and 4 are most likely to restrict 'sprawl'
Alternative development locations	<ul style="list-style-type: none"> Consider small-scale Green Belt releases in locations other than the directions of growth outlined Build 2-3 storeys on the Goods Yard Build new towns near established transport links using brownfield sites Prioritise brownfield sites Future growth should be outside the bypass with Park and Ride Promoting USS's properties at Myson Way and Raynham Close as employment locations Try Watton-at-Stone or Stanstead Abbots as they both have rail links Buntingford and Sawbridgeworth North of Harlow Hertford Extend towns around the perimeter of each. Dunmow/ Takeley Use empty properties Use Olympic Stadium after 2014 Has the redevelopment of Anchor Street/South Street been considered South of Royston area Spread a sensible number of homes amongst every town, village and hamlet
Miscellaneous	<ul style="list-style-type: none"> Target of 8,500 homes is spurious. Ignore targets and build according to local needs and budgets Increasing housing supply does not increase affordability but does fuel demand. No need for new homes Town has reached its natural capacity Infrastructure cannot cope. Need appropriate infrastructure Concentrate on social housing where car use/travel is not the priority and rebuild communities Too much housing growth in Bishop's Stortford in the recent past; too many flats built in recent years; no flats above three storeys; no demand for flats This has to be the prerogative of the inhabitants of these towns Do not build on the Green Belt Need agricultural land for food production Expand bypass to M11 Town centre residential development should be car-free due to area having good public transport accessibility Stansted Airport has planning permission to grow to 35 million passengers per years and 274,000 total aircraft movements. These levels are expected to be reached during the plan period We don't need more executive houses that only the rich can afford. Schools are full Damage to character of the town Traffic congestion e.g. Hockerill

Q24 - Summary Comment	Q24 - Detailed Comment
	<ul style="list-style-type: none"> • Keep pressure off town centres • Teenagers need something to do • Opinions should not be restricted to simple preferential ranking ticks in boxes • Avoid coalescence and ribbon development • Suitable options must be near major roads • Ring Road sets a clearly definable boundary and is more easily defended against future expansion. • Town Council will not sell its allotments • General approach should be high density with some medium • None of the options are perfect but development is necessary
Areas of Special Restraint (ASRs)	<ul style="list-style-type: none"> • Remaining Local Plan allocations, including the ASRs, should be carried forward as an allocation even if a planning application is not forthcoming. • Development of the ASRs will be necessary to address the shortage of housing land across the district • ASRs should be renamed as they are no longer 'reserve', but are now development sites following the Council's 2008 decision to release the sites for development. • Object to development of ASRs

Comments received to Q24 in respect of other Chapters

Chapter 3: Development Strategy

Q24 - Summary Comment	Q24 - Detailed Comment
General – East of England Plan	<ul style="list-style-type: none"> • Paragraph 3.2.19 of the Issues and Options document states that the number of homes East Herts must provide may be reduced following the revocation of the East of England Plan. However, this does not affect the clear position set out in the draft document with regard to the ASRs, a position which has been long established. It is vitally important that the local authority urgently comes to a view on total housing numbers.

Question 25: Approach to Development in Bishop's Stortford

Please rank the approaches to development in Bishop's Stortford in order of preference. Is there another approach we have not considered?

31 people/organisations provided comments in relation to Question 25. These included:

- 19 Individuals
- 6 Developers/landowners/agents/businesses
- 4 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Environment Agency
 - Hertfordshire County Council – Passenger Transport Unit
 - The Thatching Information Service
- 2 Town and Parish Councils including:
 - Bishop's Stortford
 - Thorley

Q25 - Summary Comment	Q25 - Detailed Comment
High Density	• Higher density development is likely to be more commercially viable for passenger transport provision
	• High density causes noise and pollution
	• Prevent cramped accommodation
	• Prefer quality town house/terrace style approach to higher densities, rather than flats
	• Redress current imbalance away from flats towards family housing on appropriate sites
	• Too many flats; high density flats have changed the town's character
	• Infrastructure and roads unable to cope with increased density
Medium density	• Medium density to the east
Low density	• Development should be low to medium density – we have far too many flats
Depends	• Cannot ask about density at this stage
	• Density can only be considered on a site-by-site basis; a mix of all three.
	• Density should be considered in terms of flood risk. Consider building on stilts
	• Need to build communities not dormitories, not ugly boxes.
Do not develop	• No further land-take
	• Do not develop
Miscellaneous	• Use the boys school land

Question 26: Bishop's Stortford Vision

Do you agree with the emerging LDF vision for Bishop's Stortford?

29 people/organisations provided comments in relation to Question 26. These included:

- 13 Individuals
- 7 Developers/landowners/agents/businesses
- 6 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Environment Agency
 - Jehovah's Witnesses
 - Natural England
 - Sport England
 - Stansted Airport Ltd
- 3 Town and Parish Councils including:
 - Bishop's Stortford
 - Farnham Parish Council (Essex)
 - Stansted Parish Council (Essex)

Q26 - Summary Comment	Q26 - Detailed Comment
Support vision	• Support the vision
	• Support development of the ASRs
	• Support strengthening of town centre viability and vitality
	• Support set-back from river front
	• Support flexible employment approach
Object to the vision	• Support Civic Federation's Vision – no need for another vision
	• More housing will add to dormitory effect
	• Concerned that the development will not meet housing need but rather demand, which will stimulate further demand
	• Need more emphasis on economic sustainability to prevent export of jobs
	• Need to look at maximum population and housing requirement for the town
	• Why is there no mention of Stansted Airport in the draft vision? E.g. employment and transport opportunities, and the need to mitigate impacts of noise and traffic
	• Oppose development on the ASRs
Question deliverability	• Vision is too vague/idealistic – how will these goals be achieved?
Other comments	• Concerned about access to Farnham village through the ASRs
	• Do not redevelop the Mill Site with flats – we were promised a green open space
	• Object to any spread into Uttlesford District

ESSENTIAL REFERENCE PAPER 'K': CHAPTER 5 - BUNTINGFORD

Question 27: Growth Options for Buntingford

Please rank the growth options for Buntingford in order of preference. Is there another approach we have not considered?

124 people / organisations provided comments in relation to Question 27. These included:

- 111 Individuals / Residents
- 5 Developers / Landowners / Agents / Businesses
- 7 Stakeholders / Organisations including:
 - Broxbourne Woods Area Conservation Society
 - Buntingford Civic Society
 - Environment Agency
 - HCC Passenger Transport Unit
 - Hertfordshire Biological Records Centre
 - Thames Water
 - The Thatching Information Service
- 1 Town and Parish Council (Buntingford Town Council)

Q27 - Summary Comment	Q27 - Detailed Comment
Support for Buntingford	• Should be given a degree of priority - plenty of land around Buntingford that could be utilised without encroaching on Green Belt
	• Could accommodate a little infilling
	• Major roads
	• Towns are most appropriate especially Buntingford, able to absorb larger developments and improving existing services and facilities; expand Buntingford to an economic size to provide facilities for rural area
	• Stortford, Hertford Ware are already crammed and overpopulated - room for expansion in Buntingford and Sawbridgeworth
	• Ware, Hertford and Sawbridgeworth haven't got good roads in rush hour - Buntingford and Stortford have
Objection to Buntingford	• Not comparable to other towns - small size, lack of infrastructure, no rail link
	• significant development taking place without future service planning for health and schools, quality of life
	• Need to update housing figures in document - recent development means that Buntingford has already had 10 years worth
	• Expansion has been poor quality which does not reflect important historic merit of existing buildings, increasing housing stock will do little to enhance this
	• Keep rural feel of Buntingford, character, green, character damaged by significant development
	• No more homes in town; no options suitable
	• Towns at capacity cannot support extra housing - roads terrible and trains full; road infrastructure is too antiquated/inferior especially A414 Hertford; none of these towns can sustain intensive housing development; towns had more than fair share, already congested
	• Important for schooling village children but no local employment and poor public transport = commuting and dormitory town
Buntingford - poor infrastructure	• No rail link, leisure (kids have nothing), broadband, drainage/sewage, cars, employment, policing and fire (part time), schools oversubscribed, long way from hospitals, doctors, dentists, sports, allotments, burial facilities - reason for low

Q27 - Summary Comment	Q27 - Detailed Comment
	values; large numbers of additional housing would increase in commuting, congestion
Buntingford - General Comments	<ul style="list-style-type: none"> • Conserve landscape setting, keep town as compact as possible • Whatever happens will require massive investment in infrastructure esp transport; options can only be ranked based on clear vision for infrastructure including funding • Guided by natural limitations to growth e.g. bypass and land availability. Against uncontrolled growth • Support recognition that development needs to help reduce carbon emissions • Needs housing for maturing families not first/second time buyers • No options are perfect but development is necessary • Ranking based on rail transportation and bus services • Problem with all options is distance from town centre. Need additional parking and shuttle mini-bus • Need to be near to major roads • Preserve some "green fingers" along existing rights of way and river corridors • Must take into account swallow holes (geology) when determining locations for development
Growth option 1: built-up area	<ul style="list-style-type: none"> • Limited capacity, lack of land to build on, built up a lot, congested; remaining green spaces should be preserved, • Close to existing transport provision and able to enhance provision • Optimum option meet Core Strategy objectives and would concentrate development in sustainable location; redevelopment of existing land, need to preserve land for agricultural use; help keep town as compact as possible • Apply sequential test and approach - development will need to be located outside of flood zone 3. However, redevelopment may help to reduce flood risk for existing properties
Sainsbury's	<ul style="list-style-type: none"> • Suitable for carefully planned housing (height); may be able to accommodate all housing and employment <u>need</u>; only remaining location in option 1; access to roundabout; plenty of industrial units to north • Not suitable - not appropriate location, not accessible for housing, • Retain for employment use as recommended by Employment Study; prospect for retaining/redeveloping site for economic development should not be excluded • Standalone option and first preference
Growth option 2: Southwest	<ul style="list-style-type: none"> • In respect of sewerage, south to the town is most suitable although need to demonstrate to adverse impact on amenity through odour • Unsuitable - spoil nature of Aspenden and Westmill; traffic noise from bypass; conflict with sewage works; narrow lanes, high quality agricultural, segregated from key services, flood zones • Do not support • Dependent upon extent - becoming remote from existing service provision, careful layout required • Relates well to settlement, contained by bypass (not urban sprawl) and less sensitive landscape setting; referred to in HCA & EoSA; South and west scored first and second in SA by Scott Wilson • Near major roads • Apply sequential test and approach - development will need to be located outside of flood zone 3 (River Rib) - natural buffer zone along river • Westwards ok, but not southwards; infill westwards to bypass; Buntingford west outside flood zone • Any new houses should be in areas that are clearly delineated e.g. by a bypass • Available for development, no impact of agricultural loss, access from bypass, can be designed to avoid noise, can include retail, good connectivity, acceptable in

Q27 - Summary Comment	Q27 - Detailed Comment
	sewerage and water terms, free from significant environmental and technical constraints, surface water balancing
Growth option 3: North	<ul style="list-style-type: none"> • Close to shopping frontage, well screened, close to employment, defensible boundary, no designations, lack of coalescence, accessible, available, not in flood zone • completely outside accessibility criteria - require diversions and service enhancements - unsustainable in long term • Least preferred as part of transition of town to rural area and exacerbate traffic congestion, public footpaths need to be protected, area of archaeological significance, wildlife site • Would not despoil landscape • Any new houses should be in areas that are clearly delineated e.g. by a bypass • Some space • Apply sequential test and approach - development will need to be located outside of flood zone 3 (River Rib floodplain) natural buffer. Largest area of floodplain to the east of Ermine St only • Unsuitable - presence of swallow holes; noise; do not support • Ensure development does not spread further north than necessary
Growth option 4: Northeast	<ul style="list-style-type: none"> • Unsuitable - availability of land?; floodplain; parklands of Corneybury; Remote and difficult to serve • High elevation would ruin landscape and lead to urban sprawl, town's escape route to countryside • Most suitable option. Land is available (dispute statement in Core Strategy), no known environmental or ownership constraints, assist with housing supply, would 'round-off' extent of town on lower slope and permanent boundary established, include proposal for CHP and assist with carbon emission reductions • Lots of space
Growth option 5: east	<ul style="list-style-type: none"> • Unsuitable - narrow lanes, high quality agricultural, segregated from key services, flood zones • Logical to go southeast to avoid elongation and spread to west of A10; help keep town as compact as possible • Close to existing transport provision and able to enhance provision • Lots of space • Positively against on rising land to east • Apply sequential test and approach - development will need to be located outside of flood zone 3 (Hailey Hill Main Ditch watercourse) • Snells Mead area is suitable - walkable to co-op supermarket • No topographical or boundary issues, maturing boundary exists which would be comprehensive by time site was developed
Miscellaneous	<ul style="list-style-type: none"> • Community has to decide • No Green Belt shown for Buntingford • None • Preclude Q22 options d and c? • East to bypass • Expansion compactor • Sawbridgeworth not comparable to Stortford, Hertford, Ware • Besides having somewhere to live, larger population needs something to do esp teenagers and not just sports facilities • Consult Environment Agency • Many • Concentrate on social housing where car use is not priority - rebuild communities • Young and old people like towns but for different reasons • Only people to profit are developers and builders

Comments received to Q27 in respect of other Chapters

Chapter 1: Background and Context

Q27 - Summary Comment	Q27 - Detailed Comment
Infrastructure	• If building in towns need to provide more infrastructure; depends on available funding and cost of extending infrastructure including public transport, road improvements to cater for increased traffic; growth without infrastructure is stupid
	• Need to ensure minimal impact on existing housing stock and infrastructure
	• Infrastructure cause difficulties - major demolition and start from scratch

Chapter 2: Key Issues and Vision

Q27 - Summary Comment	Q27 - Detailed Comment
Theme 3	• Offer smaller accommodation to smaller families leaving larger properties for larger families
	• Only build small properties - people live alone and can be housed in a smaller area - don't need executive houses only rich can afford

Chapter 3: Development Strategy

Q27 - Summary Comment	Q27 - Detailed Comment
Opposition to growth	• Population growth and development can't continue forever; not developing; no new houses in any areas - southeast already congested; campaign to limit immigration: fewer people = fewer houses;
	• Regeneration of deprived areas - not destruction of areas of beauty and cultural heritage
	• Target of 8,500 is spurious, reject assumption we need these homes, drastically reduce this number, prefer no growth
	• commuter dormitories - more housing is madness
	• Cannot keep building on countryside - conserve countryside and rural character
Green Belt	• For towns surrounded by Green Belt, option 1 is only option
	• Restrict to towns to preserve Green Belt, reduce congestion and ensure shops remain open and used by local residents
	• Don't build on Green Belt - designated for a reason
	• Build out to natural boundaries e.g. bypasses before using Green Belt
	• Growth should not be outward on Green Belt land: should be upward e.g. flats / maisonettes
Approach to development	• If must use Green Belt land, should be on edge of towns
	• Extend towns round perimeter of each
	• Build houses where you would otherwise build offices and supermarkets
Approach to development - brownfield land	• Expansion outwards is best - keep centres more open
	• Renovate empty properties and office blocks
	• Increase central densities of all towns
	• Build only or firstly on all available brownfield land (disused office blocks, industrial sites, railway sidings)
	• In-town sites are preferable provided they do not destroy historic fabric, character, layout
Housing targets	• Keep pressure off town centre areas
	• Not fair to rank growth options until robust level of housing need has been established.
	• Ignore target driven approach and build according to local needs and budgets;

Q27 - Summary Comment	Q27 - Detailed Comment
	demand for housing should be based on population forecasts for this settlement and infrastructure constraints, Green Belt and local job prospects
Q22	<ul style="list-style-type: none"> • Spread sensible number of homes (no flats) amongst every town, village, hamlet; maybe add a few dwellings to all options
	<ul style="list-style-type: none"> • 1: Hertford; 2: East Stortford; 3: Sawbridgeworth
	<ul style="list-style-type: none"> • Excludes east of Welwyn Garden City and Stevenage which adds to pressure to the towns on the periphery
	<ul style="list-style-type: none"> • North of Harlow
	<ul style="list-style-type: none"> • Watton-at-Stone & Stanstead Abbots - both have rail links
	<ul style="list-style-type: none"> • New towns near established transport links i.e. old airfields; new town of 8,500 with schools & hospitals or too expensive
	<ul style="list-style-type: none"> • Use Olympic stadia
	<ul style="list-style-type: none"> • South of Royston
Q23	<ul style="list-style-type: none"> • Area between Westmill and Aspenden
	<ul style="list-style-type: none"> • Growth of towns should be proportionate to existing; uniform distribution within existing town boundaries in proportion to their population

Question 28: Approaches to Development in Buntingford

Please rank the approaches to development in Buntingford in order of preference. Is there another approach we have not considered?

11 people / organisations provided comments in relation to Question 28. These included:

- 5 Individuals / Residents
- 3 Developers / Landowners / Agents / Businesses
- 2 Stakeholders / Organisations including:
 - Buntingford Civic Society
 - HCC Passenger Transport Unit
- 1 Town and Parish Council (Buntingford Town Council)

Q28 - Summary Comment	Q28 - Detailed Comment
Higher densities	• Adverse impact on character of Buntingford and views of it from surrounding countryside
	• In terms of transport provision, higher densities favoured as more likely to be commercially viable
	• Caused high land values, congestion and overcrowding
	• Recent developments have been higher density with smaller gardens and inadequate parking, which if it continues, will discourage people from putting down roots
Medium densities	• Range of densities required; providing houses of different densities to attract and keep a balance of population; mix of housing styles and densities to cater for different lifestyles
	• 30-40dph providing a range of housing types and respecting urban design and landscape;
	• Density of 33-35dph is publically and commercially viable
Lower densities	• Protect quality of life; buffer zones, rural character, space for family
Case by case basis	• Density needs to be assessed on an individual basis taking into account site characteristics;
Housing Mix	• Need to build more family housing 2, 3, 4 bed
	• Elderly accommodation (e.g. flats) should be built close to town centre
	• More bungalows, not larger houses
Other	• Need employment opportunities and parking otherwise lead to out-commuting
	• Planning not just for next few years but for generations to come
	• No growth
	• Broad socio-economic mix required
Parking	• Adequate parking should be provided
	• Can't force people not to own cars

Question 29: Buntingford Vision

Do you agree with the emerging vision for Buntingford?

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

- 3 individuals/residents
- 5 Developers/agents/businesses
- 6 Stakeholders / Organisations including
 - Buntingford Civic Society
 - Environment Agency
 - HCC Passenger Transport Unit
 - Hertfordshire Biological Records Centre
 - Natural England
 - The Thatching Information Service

Q29 - Summary Comment	Q29 - Detailed Comment
Purpose of vision	<ul style="list-style-type: none">• Core Strategy should not include generic statements and vague aspirations that could apply anywhere; too long and insufficiently precise• Needs to set out what, where, when and how development will be delivered• Needs to relate more specifically to individual character and nature of place• Require LPA to successfully uphold the vision• Vision supported in principle• Town Council articulate its vision better
Support (with revision)	<ul style="list-style-type: none">• Broadly agree• Reference to accessibility by sustainable modes of transport• Protect natural environment (habitats and species)• Emphasis on rural• Mix of housing reflecting broad socio-economic mix who are involved in planning process, sufficient green space provided to prevent overcrowding• Sainsbury's site includes sports facility, allotments and burial space retained• Reference to fact that growth will be accommodated without increasing flood risk, utilise floodplain as green space• Inclusion of combined heat and power• Support reference about additional housing being well connected to the town
Object	<ul style="list-style-type: none">• Not understood nature of town,• Not refer to Sainsbury's which should continue for employment (unsustainable location for housing)• Object to Sainsbury's site to be developed for housing• Buntingford chapter summarises key issues, challenges, historic character, setting features but these are not reflected in vision• Question how growth can be accommodated without compromising wider landscape setting - aim must be to minimise impact of development
Object to growth	<ul style="list-style-type: none">• Existing new development has already added to congestion, lack of infrastructure, transport, can't cope with new housing
Other	<ul style="list-style-type: none">• Town Council concerns ignored

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ESSENTIAL REFERENCE PAPER 'L': CHAPTER 6 - HERTFORD

Question 30: Growth Options for Hertford

Please rank the growth options for Hertford in order of preference, and comment on their suitability.

Are there any other options we have not considered?

147 people/organisations provided comments in relation to Question 30. These included:

- 122 Individuals
- 13 Developers/landowners/agents/businesses
- 10 Stakeholders/organisations:
 - Environment Agency
 - Hertford Civic Society
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council – Passenger Transport Unit
 - National Grid Property Holdings/National Grid Gas
 - Stop Stansted Expansion
 - Thames Water Property Services
 - The Thatching Information Service
 - The Ware Society
 - Transition Hertford
- 2 Town and Parish Councils:
 - Hertford Heath
 - Hertford Town

Q30 - Summary Comment	Q30 - Detailed Comment
Hertford Growth Options - General	<ul style="list-style-type: none"> While it is hoped that the final number of new houses allocated to Hertford is limited, by both a stringent and careful analysis of the numbers used from the East of England Regional Plan, and an equitable spread of houses across the District's existing settlements, it is clear that Hertford will still be asked to build a significant number of houses during the period of the LDF. Should current pressures continue, Hertford would have to grow as a town beyond 2031 therefore all options for future growth need to be considered with great foresight.
	<ul style="list-style-type: none"> There is not enough information here to make a decision. The areas outlined are too 'woolly'.
	<ul style="list-style-type: none"> This option excludes east of Welwyn Garden City & Stevenage which adds pressure therefore to the towns not on periphery
	<ul style="list-style-type: none"> Best to build in areas already built on.
	<ul style="list-style-type: none"> Hertford Civic Society recommends that a study (Town Plan?) should be conducted to identify Hertford's needs up to 2031 before any searching for sites to expand the town.
	<ul style="list-style-type: none"> None are perfect but development is necessary.
All Options Object	<ul style="list-style-type: none"> None of the options preferred.
	<ul style="list-style-type: none"> None of options supported due to some or all of the following issues: increased pressures on an already congested road infrastructure which is too antiquated/inferior to accommodate all the new developments, especially the A414 in Hertford (thorough review of the road network in and around Hertford needed with the funding secured for additional infrastructure before any development is permitted); trains on both Hertford North and East lines are over subscribed; parking is difficult; public services already strained (e.g. doctors); education; beauty; cultural heritage..
	<ul style="list-style-type: none"> Equal last preference to all options.
	<ul style="list-style-type: none"> To avoid further ribbon development and keeping space between major towns, Hertford should be restricted in further development.
	<ul style="list-style-type: none"> Impact of increased housing on the town of Hertford and Ware significantly higher than other towns because of the proximity to each other and to London. Prospect of Hertford and Ware to coalesce will happen if the Green Belt between these two towns is not kept and protected from development.
	<ul style="list-style-type: none"> Hertford & Ware town centres are far too crowded so adding more housing would destroy the towns further. By keeping developments within bypass roads you reduce the town footprints impact on the countryside.
	<ul style="list-style-type: none"> Reject the assumption that we need these homes.
	<ul style="list-style-type: none"> Prefer no growth.
Option 1 Support	<ul style="list-style-type: none"> Support
	<ul style="list-style-type: none"> No more new dwellings than can be accommodated on brownfield land within towns only. Avoid other options.
	<ul style="list-style-type: none"> Option 1 is the Town Council's first preference for the future growth of Hertford. However, this cannot be at the expense of employment land which must be retained for the benefit of the town and not transferred to other parts of the District.
	<ul style="list-style-type: none"> Use all available brownfield land first, including disused office blocks, commercial and industrial sites and appropriate railway sidings/land. Conserve East Herts countryside and rural character.
	<ul style="list-style-type: none"> PTU - Existing built up area located close to existing transport provision and able to enhance existing services, though could increase town centre congestion. This is likely to have an adverse effect on service provision and in particular buses in terms of frequency and reliability
	<ul style="list-style-type: none"> Within the built-up area, I do <u>not</u> think gardens should be built on, but redundant industrial or employment land should be used for housing. Important to keep some green spaces within the towns. Homes should have gardens for recreation and to grow vegetables and fruit.
	<ul style="list-style-type: none"> To maximise reuse of previously developed sites in urban areas flexible approach to be taken to reuse of underused or vacant employment sites for housing with compensatory employment land provided on edge of settlement to offer sustainable location for residents in accessing services.

Q30 - Summary Comment	Q30 - Detailed Comment
	<ul style="list-style-type: none"> 4 of the 5 towns are surrounded by Green Belt. For these only Option 1 is totally acceptable. Building should be restricted to the towns as much as possible to preserve Green Belt, reduce congestion on roads (i.e. people driving to facilities in towns), and to ensure shops in towns remain open and used by local residents. All options other than 1 would be disastrous for Hertford unless on a very limited scale.
Option 1 Object	<ul style="list-style-type: none"> Further building in already over-populated towns isn't or shouldn't be a suitable option. Lack of available land. Overloaded roads. Town Centre of Hertford should be a priority to provide good trade and jobs before the population is increased.
Option 1 Reservations	<ul style="list-style-type: none"> In order to protect Hertford's employment land, which centralised location helps support the town centre, it is very difficult to support development on any brownfield sites as proposed by Option 1 which would involve the loss of employment land. Any proposed change of use from employment land to residential would be regretted and should not be considered without a thorough, viable and approved plan to relocate the employment capacity lost within Hertford. Would seem impossible to develop in existing built up areas due to absence of available land.
Option 1 Observation	<ul style="list-style-type: none"> Environment Agency – Preference 4. Significant areas within the centre of Hertford that are already at high risk of flooding. Unlikely to be sustainable or achievable to promote major growth in this area. The floodplain of the Rivers Beane and Lee a constraint on development in land in the floodplain. Unselective infilling of existing urban area risks affecting adversely the quality of the built environment and/or the loss of employment floorspace. Selective infilling, particularly of obsolete commercial floorspace or non-employment premises washed over by existing Local Plan employment designations, would be a reasonable and appropriate solution to meet some of the town's housing requirement. Keep pressure off town centre areas (ranked 3rd preference) Need all the land we can use for agriculture to feed present and future generations - hence my choice for Option 1. Centre already very congested. Ring road/bypass needed. In-town sites are preferable provided they do not destroy more of the historic layout, fabric and character of the town.
Option 2 Support	<ul style="list-style-type: none"> Support Environment Agency – Preference 1. This area contains the smallest amount of floodplain and development here would be more sustainable than other sites. Floodplain of the River Mimram will need to be regarded when considering development in the valley immediately adjacent to the river. Not be acceptable to put new development at risk of flooding in the area of Flood Zone 3. Also encourage a natural buffer zone to be left free of development along the River itself. Options 2 and 3 are best but with small developments linking to old industrial areas. Good trains to London, shops and banks. Good for most adults and young. Based on rail transportation and best bus services. PTU - Area to the west of the existing settlement is most likely to have potential to extend existing commercial bus service provision to/from town centre
Option 2 Observation	<ul style="list-style-type: none"> Options 2 and 3 ranked as preference 2 = Options 2 and 4 ranked as preference 2 = Options 2 and 4 ranked as preference 4 = Both Options 2 and 4 are close to Secondary Schools, not just Option 4. Hertford Civic Society considers that the expansion of Welwyn Garden City eastwards should be taken into consideration when looking at the growth options for Hertford, on the grounds that it will remain important to maintain a sufficiently wide rural belt between the two settlements. If there are to be any extensions of Hertford's boundaries, they should be sited alongside areas already served by local schools, shopping facilities and bus routes to the town centre.

Q30 - Summary Comment	Q30 - Detailed Comment
Option 2 Object	<ul style="list-style-type: none"> Hertfordshire Biological Records Centre – do not support Problem is a lack of road capacity through Bengoe, so the only route (for buses or private vehicles) available is towards the A602 (Ware to Stevenage) road. There is no rail alternative for the north and I assume no spare utility capacity (electric, gas, water, sewerage).
Options 2 to 4 Comment	<ul style="list-style-type: none"> Options 2 to 4 may offer the best chance to provide the diversity of housing stock which Hertford will require for future generations. They also provide the opportunity to release the volume of land needed for accompanying infrastructure, not least primary school places. However, this is at enormous expense to the Green Belt.
Option 3 Support	<ul style="list-style-type: none"> Whilst development within the existing built up area may seem most sustainable, as there is limited land available for development and problems with congestion it is not the most suitable location for additional development. Development to the north of the settlement is more appropriate and support is given to green belt land release required to meet housing requirements. Options 2 and 3 are best but with small developments linking to old industrial areas. Good trains to London, shops and banks. Good for most adults and young.
Option 3 Observation	<ul style="list-style-type: none"> PTU - Development likely to access highly congested roads to/from town centre. Existing bus services are contracted and any increase in congestion is likely to have a significant impact on provision and reliability. Environment Agency – Preference 3. Would be constrained by the floodplains of the Rivers Beane and Rib so flood risk will pose more of a constraint to development in this location. Options 2 and 3 ranked as preference 2 =
Option 3 Object	<ul style="list-style-type: none"> The impact on existing road infrastructure would be particularly acute under Option 3 Completely unsuitable due to lack of transport links and existing traffic congestion. Plus flooding issues due to lack of capacity in drainage system. Would increase traffic in Porthill and the "rat run" through lower Bengoe.
Option 4 Support	<ul style="list-style-type: none"> Support There is sufficient land available to ensure a critical mass of development can also provide a new primary school to meet the identified requirement. Development in this sustainable location will respect Hertford's unique character, integrate well and avoid coalescence with Ware, Chapmore End, Hertingfordbury and Hertford Heath. Equal second preference given to Options 2 and 4. HCC - Mangrove Road/Balls Park – Need for primary school places in this part of Hertford. One of these two sites could be allocated as reserve primary school site or used as detached playing field if expanded existing school resulted in playing pitch deficiency as result. Option 4 (land to the south) provides the most sustainable option for future growth of the town when compared to Options 2 and 3 (comparison table supplied).
Option 4 Observation	<ul style="list-style-type: none"> PTU - Development locations are likely to be remote from transport provision and are likely to require additional subsidised routes as would be unlikely to reach such critical mass to become commercially viable Environment Agency – Preference 2. Watercourses in this area have smaller floodplain extents and amount of developable land here may be greater. Floodplain of the Rivers Lee and Bayford Brook & the Brickendon Brook main rivers will be a constraint on development in land in the floodplain. Options 2 and 4 ranked as preference 2 = Options 2 and 4 ranked as preference 4 = Option 4 not ranked.
Option 4 Object	<ul style="list-style-type: none"> Current road congestion problems and no options for solving those current problems have been identified. Creating additional demand for movements into the town centre rules out this option. Although the railway loop line runs through some of the potential area, I cannot believe another station could be constructed between Bayford and Hertford North to offer any alternative transport.
Support All	<ul style="list-style-type: none"> Any substantial growth in one area risks upsetting the natural balance of a town

Q30 - Summary Comment	Q30 - Detailed Comment
Options partially delivered	<p>which has developed according to its needs over centuries. If greenfield development is required, the town's future development is best achieved through the considerate use of all, rather than the single exploitation of one, of the external growth Options.</p> <ul style="list-style-type: none"> Favours Option 1 but generally supportive of remaining development options for Hertford.
Hertford Growth Options - Employment Land Protection	<ul style="list-style-type: none"> Growth options were preferenced within the built environment but employment land must be preserved and protected (Hertford Town Council).
Suggestions for Alternative Options	<ul style="list-style-type: none"> Watton at Stone should be considered as it has a rail link. Stanstead Abbots should be considered as it has a rail link. The amount of brownfield land is limited, therefore additional options (after Option 1) are likely to be required which should: <ul style="list-style-type: none"> Take into account public transport links. Concentrate dense development near to public transport links (bus routes, option 2 sites within walking distance of railway station, not encroaching on ancient woodland) as an absolute priority. It is noted that land to the north revealed limited land available in the Call, but the town centre and the railway stations all lie to the north of the A119/A414 corridor. Subject to satisfying highways and flooding issues, there are pockets of land to the north which, Green Belt aside (which applies to all 3 non-central options), are not constrained by environmental designations. Use land lying between the area marked option 2 and the A10 dual carriageway. A new development on the higher land in this area could be given the character of an urban village so that it had a community feel, much as Bengoe does today. It would benefit in sharing some of its infrastructure with Hertford and some with Ware, although as a significant amount of housing would need new infrastructure on its own account. Extend Option 4 to include land to the west of Brickendon Lane which would ensure that part of the site was not located within a 'Green Finger'. (Comparison table of growth options supplied) Stortford, Hertford, Ware are already crammed and over populated. Room for expansion in Buntingford, Sawbridgeworth. Ware, Hertford & Sawbridgeworth haven't got good roads through the towns in rush hours. Buntingford & Bishop's Stortford have got better roads. Extend towns around perimeter of each. Expansion outwards is the best method - keep centres more open. Renovate empty properties. Use the Olympics stadia infrastructure of the Olympics stadia - underused after 2012. Build close to them to generate the usage and capitalise on the services provided; make them economically used. Also on a direct route up to Stansted. Moratorium on new development. Drastically cut-down the number of homes supposedly "needed". Quite a lot of sites where planning permission has already been given, but the houses not yet available. Might be better to review whether there is still a need for more housing after all those have been built. Not considered the option that without enormous infrastructure investment private housing is not the option. Concentrate on social housing where car use / travel is not the priority and rebuild communities. Try to keep within 'ring roads'. Put Gascoyne Way in a tunnel under Hertford. There would then be space above for plenty of homes, green spaces etc and needn't spread out Hertford any further. Bypass Hertford to the south - as proposed in the 1960s. Line still available - then fill in. Any schemes that would impact on A414 traffic through Hertford. A Hertford bypass would be essential. This could run from Rush Green roundabout on A10 through farmlands & Balls Park to the roundabout on A414 at Letty Green. This would alleviate the heavy traffic in and around Hertford.

Q30 - Summary Comment	Q30 - Detailed Comment
	<ul style="list-style-type: none"> Has to be the prerogative of the inhabitants of these towns Office blocks and empty buildings could be used for flats and houses etc. This would be a much better investment than spending millions of pounds on new homes and would benefit more families and communities, we cannot keep building over our countryside in this way Instead of adding more supermarkets and office buildings - putting housing on those sites Land south of A414 Hertford to A10 link road; limited in extent to prevent coalescence with Hertford Heath Disused areas and reuse empty properties. Many!! None
Carbon Reduction	<ul style="list-style-type: none"> The Consultation states that green house gas emissions, can be reduced by providing opportunities for non-car transport through the location of new development. From the Call for Sites, there is limited land available to provide the number of houses in a central location. Also, there is still high car dependency in new homes within central locations. Given the amount of land available outside of Hertford, it is likely that the town's urban sprawl will have to grow as per Options 2 to 4 to fulfil any significant homes allocated to the town. Therefore, it is very doubtful that the desired objective of reducing carbon dioxide emissions, in a town heavily dependant on the car for transport, will be achieved under any of the Options
Green Belt	<ul style="list-style-type: none"> No Green Belt incursion Preserve Green Belt as far as possible If you have to use Green Belt land, let it be on the edge of towns. Concur that there will be a need to release greenfield sites on the edge of Hertford in order to accommodate the required level of housing to 2031 and that as a result there will need to be a local review of the Green Belt.
General	<ul style="list-style-type: none"> Most people like towns, not rural areas. Old people for transport, doctors, libraries. Young people for schools, sports centres, towns. None of the options can be properly ranked without a clear vision of plans for the necessary road, rail and services infrastructure that will be needed, including how it will be funded. There must be road improvements to cater for increased traffic volumes. These are not mentioned. While there are good train links, buses, doctors and schools there will be a need for increased infrastructure to support development. Growth without infrastructure is plain stupid!! Infrastructure elements will present difficulties for sustainability within the built environment and hurtful for all towns. Would this call for major demolition and start again from scratch. Suitability: Important to be near to present major roads. These options already preclude Q1* options D, C - why? North of Harlow (*Q1 Summary Leaflet = Q22 Full Consultation) Need to avoid coalescence (Hertford and Ware and other areas). Need to avoid an urban build-up: Ware-Hertford-Welwyn Garden City-Hatfield-St Albans-Hemel-Berkhamsted
Future Housing	<ul style="list-style-type: none"> Should create mixed housing stock.
Sewerage and Water Networks	<ul style="list-style-type: none"> Growth in all of these areas would be served by Rye Meads STW as such the options for growth in these areas should consider the outcomes of the Rye Meads Water Cycle Study.
Environment Agency General Observations	<ul style="list-style-type: none"> Development in the floodplain should be avoided, and opportunities to reduce flood risk should be sought where possible. Re-development may offer the opportunity to reduce the flood risk by either setting back development out of the floodplain or incorporating flood resistant and resilient technologies into existing developments. Natural buffer zones should also be left free of development along the rivers corridors themselves, not only to provide a green corridor, but to ensure access can be maintained to the watercourses and existing flood defences, and space is left for potential future flood defence work.

Q30 - Summary Comment	Q30 - Detailed Comment
	<ul style="list-style-type: none"> Consideration to be given should land be on designated flood plane. Environment Agency consultation required.
Hertford Town Council Detailed Comments	<ul style="list-style-type: none"> Hertford Town Council submitted detailed comments beyond the scope of this consultation (which may be viewed via full response) appertaining to: Climate change; protection of Green Fingers; use of green technologies in development; location of housing for elderly; concerns over recent developments not providing balanced housing stock; protection of Hertford's character; the need for an enhanced town centre; Health, wellbeing and play issues; funding of infrastructure;
Villages	<ul style="list-style-type: none"> It might be that some of the small settlements to the north of Hertford could grow with sustainability advantages.
Site Specific Comments	<ul style="list-style-type: none"> Hertford Road North However galling to reward landowner for neglect of land, Archers Spring area is well served by local centre and would resolve longstanding misuse problem. Compulsory purchase the land back from Lloyds at Archers Spring plus add on housing at Sele Farm (don't want to lose Blakemore Wood) Land adjacent to 145 North Road (ref 03/023) Dunkirksbury Farm (ref 03/011) Land North of London Road Hertford Fire & Ambulance Station, Old London Road West Street Allotments, West Street Mangrove Road/Balls Park Thieves Lane 13 – 19 Castle Mead Gardens Hertford Police Station (former) Land to the west of Brickendon Lane Option 1. Land fronted by Mill Road and Mead Lane adjacent to Hertford East Station including redundant railway sidings should be considered ripe for high density development. Option 1 Land in Churchfields presently GPO sorting office. Relocate sorting office to ease traffic congestion in town centre build medium density housing on site. Sainsbury's store at McMullen's site – request to include within town centre boundary.
Miscellaneous	<ul style="list-style-type: none"> As usual the Council are dictating and this consultation is a token gesture. If some pressure arises from not enough houses as opposed to flats, presumably EHDC will immediately refuse applications for flats on land that could take houses

Comments received to Q30 in respect of other Chapters

Chapter 2: Key Issues and Vision

Q30 - Summary Comment	Q30 - Detailed Comment
Themes	Town Council largely agrees with and support the themes outlined in the Consultation Document. However, they consider that all of the proposed Growth Options for Hertford to 2031 pose serious challenges to achieving these themes.
Theme 5: Economy, Skills & Prosperity	According to the Consultation, Hertford has the highest proportion of the District's employment land at 26%. However this should not be taken for granted by focussing new business based development elsewhere in the District. Some of the town's largest employers are in the public sector, which in light of the shift towards a smaller state, poses a risk to Hertford's employability. It should also be stressed that Hertford has lost a lot of traditional employment land recently to residential use and this is particularly acute in locations close to the town centre. It is alarming to read that lost employment land could be replaced elsewhere in the District (paragraph 6.3.21).
Theme 7: Health, Wellbeing & Play	With a larger population besides having somewhere to live people, especially teenagers, need something to do and not necessarily sports facilities. Is this going to be top of the agenda!!

Chapter 3: Development Strategy

Q30 - Summary Comment	Q30 - Detailed Comment
Housing Target / Amount of Development	Town Council surprised East Herts Council appeared to have too readily accepted the development of 8500 homes acceptable within East Herts. Town Council's judgment that, in resolutely opposing the north of Harlow development, the District Council may have accepted that the area could cope with an additional 8500 homes. The Town Council opposed this view.
	Do not agree with assumption that such large numbers of houses are needed in the area.
	Concerned that the premise of these options is that a further 8,500 new homes must be built in East Herts by 2031, and Hertford therefore must take many of these. I believe this number is unrealistically high for the district, and should be reviewed following the revocation of the East of England Plan.
	No development is preferable. Population growth and more development can't continue forever. Eventually we must stop. Let's stop now while we still have our countryside.
Approach to identifying housing target	Ignore 'target-driven' options and build according to actual local needs and budgets.
	Demand for housing should only be based on population forecasts for this settlement and the constraints of infrastructure, Green Belt and the prospects for local job creation.
Towns at Capacity	Towns are full to capacity and cannot support extra housing.
	None of these towns can sustain intensive housing development.
Housing Needs	A flexible approach to growth options is required to ensure that long terms housing needs are met. This may include the use of sites in the greenbelt/greenfield and at the edge of towns and villages.
Development Strategy - Options / Locations	Growth in Hertford preferable to Stortford
	Hertford, Ware and Sawbridgeworth have no by-pass roads and much increase in traffic feeding developments could cause through road congestion which already exists in rush hours.
	South of Royston area.
	In prioritising development between towns we suggest Hertford is priority 1, East Stortford 2, Sawbridgeworth 3.
	New towns preferred. Ideas suggested: near established transport links using sites which are run down i.e. old airfields (not North Weald).
	Growth should be upward i.e. well-designed flats/maisonettes, perhaps looking out over Green Belt land. Not high-rise, but sensible.
	I have given my options to each town/village. But feel maybe to add a few dwellings in all options.
	Buntingford and Sawbridgeworth are small towns unlike Hertford, Ware and Bishop's Stortford. Development should be proportionate to keep the character of the towns.
	These towns have had more than their share of over development. Spread a sensible no. of homes (no flats) amongst every town, village and hamlet.
Q23 - Housing Distribution	Uniform distribution within existing town boundaries in proportion to their population.
	Growth of towns should be in proportion to what is already there.
	Hertford has not suffered as much new housing as Bishop's Stortford so put the extra in Hertford.

Question 31: Approach to Development in Hertford

Please rank the approaches to development in Hertford in order of preference. Is there another approach we have not considered?

23 people/organisations provided comments in relation to Question 31. These included:

- 8 Individuals
- 9 Developers/landowners/agents/businesses
- 4 Stakeholders/organisations:
 - Environment Agency
 - Hertfordshire County Council – Passenger Transport Unit
 - The Thatching Information Service
 - Transition Hertford
- 2 Town and Parish Councils:
 - Hertford Heath
 - Hertford Town

Q31 - Summary Comment	Q31 - Detailed Comment
Lower Density Support	<ul style="list-style-type: none"> Town Council concerned not only with the preservation of the built environment of Hertford, but also in maintaining the community character and population balance and this could only be maintained through a mixture of housing provision. In recent years sustained development of high density housing in the form of apartments led to density issues in terms of infrastructure, changes in dynamics within communities and the character of the area. Therefore considered important to restore the balance through lower density, higher quality developments.
Medium Density Comment	<ul style="list-style-type: none"> Would prefer no prescriptive density but if allocated a specific density then sensible to take the middle ground – Medium density. However, as per 3.3.6 of the Issues and Options paper <i>'density can only be addressed once a clearer idea of the preferred development strategy for the district.'</i>
Higher Density Support	<ul style="list-style-type: none"> High density earlier traditional "non-flat" housing is now prized, and tends to encourage social interaction and mutual support, and encourages movement by foot or bicycle (though provision does need to be made for parking). Tight building also needs to ensure access to green space. In this context, the "green fingers" which Hertford has been blessed with must be maintained.
	<ul style="list-style-type: none"> PTU - In terms of transport provision, higher densities are favoured as these are likely to be more commercially viable. Higher density development would be preferred from the perspective of environmental sustainability as this will tend to provide greater opportunities for: <ul style="list-style-type: none"> Decentralised energy. Reducing the land take required. Potentially reducing heating demand (by allowing buildings to shelter one another from cool winds and reducing the proportion of external walls). Supporting public transport provision and other local services/ facilities. However, careful design will be critical to ensure new development fits with the existing surrounding development. Development of new housing should be considered in tandem with development of public transport routes, infrastructure to support electric cars, and car clubs.
No ranking of approach	<ul style="list-style-type: none"> Do not consider that any of the general approaches are suitable and have therefore not ranked them. Impossible to rank "general approaches". Across the district as a whole, densities need to be maximised and particularly in the towns. Also depends if net or gross figure. E.g. high density buildings in a parkland setting may be more appropriate on the edge of the town as opposed to a "low density" traditional estate. Do not believe it is possible or realistic to seek to define development densities on a town-wide basis. Rather, development densities should reflect the character, context and potential of individual development sites, with the Core Strategy simply providing a commitment to maximise the development potential of individual sites. Development should not be constrained by a general density minimum or maximum target across the whole of Hertford. Densities should be site and scheme specific in order to assist with the place making process. Do not support the adoption/imposition of a generic density approach for new development. Instead, we encourage a policy based on requiring each new development proposal to achieve the maximum intensity/density of use compatible with local context, design and public transport capacity. High density has been the order of the day in recent years and, as is evidenced every day in Hertford, traffic congestion has worsened. Living and working in Hertford and trying to negotiate the already busy roads has become more difficult with the additional numbers of people. Hertford was once a county town surrounded by green countryside. Today it is being swallowed up by developments of little architectural merit and lived in by commuters. Adding housing of whatever density will worsen the situation. The answer depends on who the housing is intended for and why it is to be built. Why are more houses/flats needed in Hertford? <i>[Examples provided]</i> In

Q31 - Summary Comment	Q31 - Detailed Comment
	reality there would be a host of different needs to be met, which would indicate different densities for different developments. But if the answer were: "Because the revoked East of England Plan said we had to build n units", how could any sensible density calculation be made?
Other Approach Not Considered	<ul style="list-style-type: none"> Mix of densities may be a more appropriate approach. Unrealistic to be too prescriptive of density – must relate to site setting, sustainable design and a sense of place that devolves from it.
	<ul style="list-style-type: none"> Development in the urban area of Hertford should continue to be relatively dense, to make the most efficient possible use of land in this most sustainable of locations. The need for small houses rather than flats, and the need to provide developments which respect the existing character of the town are noted. However, by utilising good and innovative design, it should be possible to achieve all of these things. Therefore medium and higher density developments within urban areas are supported.
	<ul style="list-style-type: none"> Another approach, favouring more mixed communities would be to take an 'onion skin' approach. In an area, provide a higher density zone with local services, surrounded by medium density housing with 'fingers' of lower density housing radiating out to an outer zone of lower density housing. This, I believe is the more traditional way that settlements have developed and hence would form more acceptable communities than simply adopting a uniform density.
	<ul style="list-style-type: none"> As advocated in PPS3, density is dependent on the site and the surrounding area, including existing residential densities. PPS3 advises that a range of densities may be appropriate, and would allow for a mix of densities on individual sites thus ensuring sustainable communities and helping to meet Theme 3 of the Vision in the Draft Core Strategy DPD, which is seeking to meet the accommodation needs of the whole community through the provision of a mix of types and sizes of dwellings. Propose an alternative – the Core Strategy DPD provides general guidance on a range of densities and advises that more detailed density information on individual sites will be considered through the Site Specific DPD.
Other Comments	<ul style="list-style-type: none"> Hertford Heath Parish Council - Can Hertford really cope with any more development. The roads are already very congested and the infrastructure must be creaking at the seams.
	<ul style="list-style-type: none"> The question posed over simplifies the issues. Given the need to avoid excessive land take, to concentrate development in sustainable and service-effective formats, and to accommodate small households, a combination of medium and higher densities should be the starting point. Very low densities are wasteful and should only be contemplated in exceptional circumstances.
	<ul style="list-style-type: none"> Environment Agency comments: Higher density development, if development in the floodplain cannot avoided, would place a higher density of people living in areas at risk of flooding. However a higher density of development may involve the use of less land for development and thus be easier to avoid flood risk areas. Lower density developments will require more land take increasing the likelihood that development will occur in areas at risk of flooding.
	<ul style="list-style-type: none"> Green Fingers and similar features need to be preserved. Concern that Hertford has seen an excessive number of flats built in recent years, and future build should redress this balance to make more houses available.

Comments received to Q31 in respect of other Chapters

Chapter 3: Development Strategy

Q31 - Summary Comment	Q31 - Detailed Comment
No growth	<ul style="list-style-type: none"> No growth

Question 32: Hertford Vision

Do you agree with the emerging LDF Vision for Hertford?

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

- 9 Individuals
- 9 Developers/landowners/agents/businesses
- 6 Stakeholders/organisations:
 - Environment Agency
 - Hertfordshire Biological Records Centre
 - Natural England
 - Sport England
 - The Thatching Information Service
 - Transition Hertford
- 3 Town and Parish Councils:
 - Brickendon Liberty
 - Hertford Heath
 - Hertford Town

Q32 - Summary Comment	Q32 - Detailed Comment
Support	<ul style="list-style-type: none"> • Support
	<ul style="list-style-type: none"> • Natural England: supports the emerging LDF Vision for Hertford in 2031
	<ul style="list-style-type: none"> • The emerging LDF vision for Hertford seems appropriate given the history and geography of the town.
	<ul style="list-style-type: none"> • Particularly agree with the need for future housing to integrate into the existing settlement.
Partly Agree	<ul style="list-style-type: none"> • The aspirations for your LDF vision are good, but not convinced it can be achieved.
	<ul style="list-style-type: none"> • It would be difficult to disagree with this description of a desirable state, but the aims, objectives and policies for East Herts and Hertford as set out would not lead to the future state described. The town's character has already been eroded, and any further outward growth will erode it further.
	<ul style="list-style-type: none"> • To achieve vision, there needs to be more impact on individuals and not convinced people will behave differently whatever decisions follow from the LDF. More development of transport provisions like cycle paths (e.g. alongside the railway across the A414 between North station and the Cole Green Way), and perhaps some intelligent advance notices re routes to avoid could help people to change their ways, but not convinced that decisions on housing will affect the outcome of vision.
	<ul style="list-style-type: none"> • Given limited development space available without encroaching onto green field sites, concerned that the vision of a dedicated cinema in the town is not a practical one without having to site this in green field space, particularly in this age of large multiplex cinemas. Hope that the newly refurbished Hertford Theatre will increase its offering of recently released films.
Object	<ul style="list-style-type: none"> • The "emerging visions" for the towns may be appropriate in other Council documents but they do not add anything to the Core Strategy and should not be included in a document intended to provide for and guide development. In the September 2009 guidance document resulting from the experience of examining DPDs, PINS states that such documents should be clear and succinct - "Generic statements and vague aspirations that could apply anywhere will not lead to a deliverable and worthwhile plan".
	<ul style="list-style-type: none"> • Believe statement " <i>Its town centre will continue as a thriving retail and employment base, with an improved range of services and facilities that will attract an increasing number of visitors</i>" to be quite untrue. Added impetus is needed to revitalise the town centre (The Wash, Maidenhead Street, Bull Plain, and Fore Street).
Mead Lane	<ul style="list-style-type: none"> • Support vision specifically including regeneration of the Mead Lane area.
	<ul style="list-style-type: none"> • Hertford Town Council: Strongly disagree with the element concerning the Mead Lane development proposal. Opposed to regeneration involving major change of use.
	<ul style="list-style-type: none"> • Hertford Heath Parish Council: The improved access in the Mead Lane area is essential.
Additional Matters Required in Vision	<ul style="list-style-type: none"> • It is surely inevitable that under any chosen Development Strategy there will be greenfield/Green Belt development around the district's towns, and it is misleading not to acknowledge this in the Vision.
	<ul style="list-style-type: none"> • Not enough attention paid to "creating harmony between environmental, social and economic needs" - nearly all the emphasis is on social and economic needs with a few tweaks which are hoped to provide a response to climate change. Challenges of climate change, sustainability, peak oil and increasing volatility in global markets and financial systems have not sufficiently been taken into account and are not adequate.
	<ul style="list-style-type: none"> • Hertfordshire Biological Records Centre: Vision must include the protection of the natural environment; particularly The Hertford Green Fingers, its rivers, Wildlife Sites, Local Nature Reserve and the species they support.
	<ul style="list-style-type: none"> • Countryside issues to be added including: importance of town/country relationships and preservation/expansion of "green fingers" (significant to Hertford's character and provide public access to green space); nature reserves; quality of the surrounding countryside (The Meads, Waterford

Q32 - Summary Comment	Q32 - Detailed Comment
	<p>Marsh and Heath, University's Pinetum, the various river valleys, and local rights of way plus routes including Colne Green Way), Sadlers Farm orchard. Also preserve playgrounds.</p> <ul style="list-style-type: none"> Hertford excellent base for accessing Broxbourne Woods and the Lea Valley Country Park. Environment Agency: It must be stated that development in the flood plain should be avoided. Vision would benefit from direct reference to managing flood risk and using new development to contribute to reducing existing flood risk wherever possible. Centre of Hertford has been progressively strangled by unsympathetic developments and road works. Future strategy for Hertford should try to reverse this and strengthen Hertford's character as a country town, and the County Town. This will require significant thought because of the piecemeal development that has taken place in the past and the lack of strategy and general direction for the town. Also difficult to offset the desires of developers. Suggest that as part of the Core Strategy, Hertford Civic Society be given the project to come up with a stronger centre for Hertford and propose a route for implementing this. Explicit support for the redevelopment of Brownfield land in proximity to the town centre and public transport needed. Need to preserve employment and shopping features. Trees etc. Needed not just for climate change reasons but because they make life better for all. Trees which go above roof height are especially valuable in "greening" a town, Preservation of the marvellous planes near the Christ's Hospital and Cross Road roundabouts will be symptomatic of whether the EDF is serious on this point. Bicycles. While agreed that more cycling is good and there are good routes a key to a successful cycling policy is good maintenance of the metre of road surface nearest the kerb. Potholes, uneven gully and drain covers, utility trenches etc are all dangerous and a deterrent to cyclists. Sport England – While overall vision broadly supported, core strategy needs to address land use implications for Hertford of the playing pitch strategy as deficiencies in the area are particularly significant e.g. the need for additional playing pitches would justify new sites being identified for outdoor sport and/or major new development should incorporate outdoor sports provision.
Other Hertford Related Comments	<ul style="list-style-type: none"> Criticism over traffic congestion in Gascoyne Way due to this. (Including comments by Brickendon Liberty Parish Council) Requests for 'pay on exit' at Council car parks. Detrimental effect on businesses in the town - people shop elsewhere. Parking is a major problem at whatever time of the day. The town centre is now a no-go area during the evening for older residents. More development will mean more traffic, more congestion, and demands for more road-building. More could be done to encourage cycling, but other 'green modes' of travel would not be relevant to Hertford. People in big cities use public transport as it is frequent and reliable, whereas driving on congested roads is difficult and time-consuming and often nowhere to park. In a place the size of Hertford public transport can never be good because the population base is not there to support it. Any attempt to discourage car use by making parking more difficult would mean people drive to competing centres, as many already do. There are problems with the town as it exists at the moment - empty shops, congestion, the dominance of commuting into and out of the town over local living and working. Two stations give protection against impact of railway engineering works and delays. Hertford has buses to a range of destinations with connections to more, although journey times of departure and durations may not suit. Town council under promotes tourism value - need a Biggles/Johns the author trail, a Wallace the naturalist trail and greater attempts to promote all

Q32 - Summary Comment	Q32 - Detailed Comment
	our riverside walks as a joined up network.
	<ul style="list-style-type: none"> Renovated Gascoyne Way multi-storey car park could be promoted with its availability of electric car recharging (there are no signs on the A414). Considerable expertise among Transition Hertford, other Transition groups throughout East Herts and local eco groups upon which you have not drawn. Would welcome the opportunity to be consulted more extensively to support development of more effective approaches which will support our communities to integrate sustainability more thoroughly towards 2031 and, ultimately, 2050.
	<ul style="list-style-type: none"> Support for development at Thieves Lane Support for development at Mead Lane

Comments received in respect of other issues in Chapter 6

Q32 - Summary Comment	Q32 - Detailed Comment
Q30 - Growth Options	<ul style="list-style-type: none"> Allow Hertford to retain its vestige of county town and do not under any circumstances allow any erosion of the surrounding countryside. River valleys, topography, and blocks of woodland (all have important roles to play and should influence the selection of growth options);
Q31 - Approach to Development	<ul style="list-style-type: none"> Most importantly we need to avoid any risk of coalescence with places like Hertford Heath, Tewin, Ware and so on.

Comments received in respect of other Chapters

Chapter 3: Development Strategy

Q32 - Summary Comment	Q32 - Detailed Comment
Question 22	<ul style="list-style-type: none"> Hertford is too important to the county to allow planners to ignore its status and permit ever more housing. Congestion and the loss of the vibrancy of the town have happened in the past decade coinciding with mass house building. More housing does not equate to better quality of life. No growth.

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Question 33: Growth Options for Sawbridgeworth

Please rank the growth options for Sawbridgeworth in order of preference. Is there another approach we have not considered?

119 respondents provided comments in relation to Question 33. These included:

- 105 Individuals
- 4 Developers/Landowners/Agents/Businesses
- 9 Stakeholders/Organisations:
 - Broxbourne Woods Area Conservation Society
 - Environment Agency
 - Epping Forest District Council
 - Essex County Council Environment Team
 - HCC Passenger Transport Unit
 - Hertfordshire Biological Records Centre
 - Rivers Nursery Site & Orchard Group
 - Stop Stansted Expansion
 - Thames Water
- 1 Town Council:
 - Sawbridgeworth

Q33 - Summary Comment	Q33 - Detailed Comment
Support for growth of the town	<ul style="list-style-type: none"> • Stortford, Ware and Hertford are already over-developed – Sawbridgeworth and Buntingford have room for expansion
	<ul style="list-style-type: none"> • Strategy should focus on towns, especially Sawbridgeworth, which have the capacity to absorb development, are close to services and Airport
	<ul style="list-style-type: none"> • Good location as it has trains into London, good shops and facilities for all ages plus industrial areas
	<ul style="list-style-type: none"> • Growth should be in proportion to existing size
	<ul style="list-style-type: none"> • No options are perfect but development is necessary
Objection to growth of the town	<ul style="list-style-type: none"> • Sawbridgeworth and Stortford constrained by river and railway
	<ul style="list-style-type: none"> • Equal last place to all four development growth options / not developing at all
	<ul style="list-style-type: none"> • Ware, Hertford and Sawbridgeworth have no by-pass therefore have more congestion – better roads in Stortford and Buntingford
	<ul style="list-style-type: none"> • Town is a commuter dormitory – more housing is madness
	<ul style="list-style-type: none"> • Conserve countryside and rural character – no GB development
	<ul style="list-style-type: none"> • Dispute need for large housing numbers – should be based upon local needs, constraints, Green Belts, prospects for job creation and budgets
	<ul style="list-style-type: none"> • Hertford then Stortford first followed by Sawbridgeworth
	<ul style="list-style-type: none"> • Used to be a village, now a town, sandwiched between Harlow and Stortford, taken its share of housing, don't count it as same as Hertford and Ware • None of towns can sustain intensive housing development, would harm character of the town
Infrastructure Issues	<ul style="list-style-type: none"> • Not enough infrastructure of all types to accommodate expansion
	<ul style="list-style-type: none"> • No development should occur in the area without necessary infrastructure upgrades, including schools, doctors etc.
	<ul style="list-style-type: none"> • By-pass needed or access to M11
	<ul style="list-style-type: none"> • Served by Rye Meads STW so should consider outcomes of Rye Meads Water Cycle Study
	<ul style="list-style-type: none"> • need to work closely with utility/infrastructure providers when deciding the development strategy, including neighbouring authorities
	<ul style="list-style-type: none"> • Cannot rank options until infrastructure delivery plan is tested and established
	<ul style="list-style-type: none"> • All options will impact on A1184 and Harlow therefore capacity improvements are needed, particularly to sewerage network
	<ul style="list-style-type: none"> • Private housing creates more infrastructure demands than social housing
Pro Growth option 1: built-up area	<ul style="list-style-type: none"> • Preferred option for access to services, facilities etc
	<ul style="list-style-type: none"> • Still remote from existing transport provision
	<ul style="list-style-type: none"> • Increase central density of towns within existing built-up area boundary with well-designed higher density flats/maisonettes
	<ul style="list-style-type: none"> • Use all brownfield land, disused industrial land and empty properties first, rebuild communities
	<ul style="list-style-type: none"> • No more new dwellings than can be accommodated on brownfield land within towns only – no GB development
	<ul style="list-style-type: none"> • Provided no development occurs within flood risk zones 2 and 3
	<ul style="list-style-type: none"> • Need all the land we have for agriculture to feed population
	<ul style="list-style-type: none"> • Instead of adding more supermarkets and offices, putting houses on those sites
	<ul style="list-style-type: none"> • Provided historic layout, fabric and character are not harmed
Anti Option 1	<ul style="list-style-type: none"> • No land available in built up centre of town therefore not achievable without comprehensive redevelopment which will never be deliverable nor realistic
	<ul style="list-style-type: none"> • Need to consider and understand the impact of this option on neighbouring Lower Sheering in terms of functionality and retaining separate characters
	<ul style="list-style-type: none"> • Consider impacts of this in existing Conservation Areas in Sawbridgeworth and Lower Sheering
	<ul style="list-style-type: none"> • Parts of town fall within flood risk zones 2 and 3 and are therefore unsuitable

Q33 - Summary Comment	Q33 - Detailed Comment
	<ul style="list-style-type: none"> Expand outwards, keep centres more open
Pro Growth option 2: Southwest	<ul style="list-style-type: none"> Based on rail and bus services Would be near to services Preferred option, though not in isolation Would engulf High Wych only if all development concentrated in this direction, if developed in part could revitalise the village Would join the two areas of ribbon development to the south and west and connect these areas better to the town Rowney Wood area is ideal for development – would accommodate much of housing need with little effect on traffic Smaller scale form could be accommodated within existing settlement pattern using unattractive countryside, if contained would not lead to sprawl particularly if Harlow North doesn't happen Lots of space Is suitable in terms of flood risk provided sustainable drainage is implemented and surface water run-off rates are capped to green field levels
Anti Option 2	<ul style="list-style-type: none"> Not ideal in terms of access to sustainable transport and accessibility criteria On Wildlife grounds Potential to engulf High Wych if all development for Sawbridgeworth were to occur in this direction and coalescence concern with Harlow
Pro Growth option 3: West	<ul style="list-style-type: none"> Preferred option only if a by-pass built Lots of space minimal impact on existing housing stock Would be near to services and is available Is suitable in terms of flood risk provided sustainable drainage is implemented and surface water run-off rates are capped to green field levels. Would need to prevent encroachment into flood plain of Sawbridgeworth Brook with 8m buffer zone around the river Land at Rivers Hospital as it's adjacent to the built-up area, is close to centre, services and facilities, takes account of areas of flood risk and makes efficient use of land in employment use, increases employment, provides a mixture of accommodation (including retirement), would make public transport more viable, is deliverable, could aid by-pass and enhance wildlife site through retention of orchard and creation of a nature reserve and public open space
Anti Option 3	<ul style="list-style-type: none"> On Wildlife grounds Would use high quality agricultural land Would not be well connected to either Stortford or Harlow but would be dependent entirely on Sawbridgeworth for services, which is deficient Well used by families for recreational purposes and a well-loved piece of countryside Few barriers to prevent sprawl into attractive countryside as land is open and prominent Not ideal in terms of access to sustainable transport and accessibility criteria
Pro Growth option 4: North	<ul style="list-style-type: none"> Most appropriate using land known as Keckies Farm and land north of Leventhorpe School – would accommodate most of housing need with little effect on traffic Preferred option despite positive and negative aspects Well placed in relation to services and facilities in Stortford which are superior to those in Sawbridgeworth Easier to ensure access to bus services based on north/south corridor and would make service more viable Least risk of coalescence Some space, though not a lot Is suitable in terms of flood risk provided sustainable drainage is implemented and surface water run-off rates are capped to green field

Q33 - Summary Comment	Q33 - Detailed Comment
	levels
Anti Option 4	<ul style="list-style-type: none"> Least preferable
	<ul style="list-style-type: none"> Would use high quality agricultural land
	<ul style="list-style-type: none"> Would see an extension to ribbon development and have a poor connection to existing settlement, coalescence concern to Stortford
	<ul style="list-style-type: none"> Few barriers to prevent sprawl into attractive countryside as land is open and prominent
	<ul style="list-style-type: none"> Need to consider and understand the impact of this option on neighbouring Lower Sheering in terms of functionality and retaining separate characters
Alternative option	<ul style="list-style-type: none"> Development of Herts/Essex zone along M11 corridor where intensive farming has degraded the land and robbed it of character and wildlife interest
	<ul style="list-style-type: none"> New towns near established transport links are preferred
	<ul style="list-style-type: none"> Build to the north of Harlow
	<ul style="list-style-type: none"> Build a new town on 8,500 homes with infrastructure
	<ul style="list-style-type: none"> Only after built-up area is developed should we build outward towards natural boundaries, including a by-pass before using the green belt tight to edge of towns
	<ul style="list-style-type: none"> South of Royston area
	<ul style="list-style-type: none"> Only near to present major roads
	<ul style="list-style-type: none"> Regenerate deprived areas rather than destruction of areas of beauty and cultural heritage
	<ul style="list-style-type: none"> Liaison with Essex authorities – build over the border – could Lower Sheering become part of Sawbridgeworth?
	<ul style="list-style-type: none"> Renovate existing derelict housing stock
	<ul style="list-style-type: none"> A few dwellings in all options, spread development over all towns, villages etc
	<ul style="list-style-type: none"> Many different alternatives
	<ul style="list-style-type: none"> Dual the A10 to A507 roundabout, improving Westmill junctions
	<ul style="list-style-type: none"> Use the infrastructure of the Olympics stadia that will be under-used after 2012 to make efficient use of services, also on a direct route to Stansted Airport
	<ul style="list-style-type: none"> Consider benefits of land at Thomas Rivers, north of High Wych Road and west of The Crest
	<ul style="list-style-type: none"> Limit immigration – fewer people = fewer houses needed
	<ul style="list-style-type: none"> Land to north of Sawbridgeworth Station – ideal for commuter housing
	<ul style="list-style-type: none"> Consider Watton-at-Stone and Stanstead Abbots as they have rail links
General Comments	<ul style="list-style-type: none"> Cannot hope to prevent both coalescence and severance
	<ul style="list-style-type: none"> Need smaller houses for smaller size households, not executive homes that are unaffordable
	<ul style="list-style-type: none"> Rivers Nursery Site could be transferred to public trust
	<ul style="list-style-type: none"> More housing means more children and teenagers so need to provide more sport, recreation and cultural facilities
	<ul style="list-style-type: none"> Previously allocated land is not coming forward or being built on despite permission
	<ul style="list-style-type: none"> Fails to consider the effects of growth in a combination of directions
	<ul style="list-style-type: none"> Assumes no development to east of Welwyn GC and Stevenage, so more pressure on towns elsewhere
	<ul style="list-style-type: none"> Green Belt Review needs to be undertaken first to enable informed choices to be made on development strategy
	<ul style="list-style-type: none"> Only residents within each town should have the prerogative to determine how their town is developed

Question 34: Approach to development in Sawbridgeworth

Please rank the approaches to development in Sawbridgeworth in order of preference. Is there another approach we have not considered?

10 respondents provided comments in relation to Question 34. These included:

- 3 Individuals
- 4 Developers/landowners/agents/businesses
- 3 Stakeholders/organisations:
 - Environment Agency
 - Epping Forest District Council
 - Hertfordshire County Council – Passenger Transport Unit

Q34 - Summary Comment	Q34 - Detailed Comment
Against a blanket approach to density	<ul style="list-style-type: none"> Should be considered on a site-by-site basis, intrinsically linked to detailed design
	<ul style="list-style-type: none"> Sustainable communities should have an appropriate mix of accommodation, therefore a mix of density is appropriate
	<ul style="list-style-type: none"> SHMA suggests more family size properties are needed – indications are that these could only be accommodated in greenfield locations
	<ul style="list-style-type: none"> The nature and character of the settlement and potential locations for growth should be considered
Benefits of high density	<ul style="list-style-type: none"> Public transport provision and other services are more viable with higher densities
	<ul style="list-style-type: none"> Avoids use of greenfield sites and land of high nature conservation value
	<ul style="list-style-type: none"> Provided it does not place large numbers of properties at risk from flooding
	<ul style="list-style-type: none"> Lower density developments use more land, increasing the likelihood of these occurring in areas at risk of flooding and subsequently increasing surface run-off
Site specific	<ul style="list-style-type: none"> Land at Thomas Rivers would be suitable for medium density development, given the surrounding density at High Wych Road and The Crest
General	<ul style="list-style-type: none"> No growth preferred

Question 35: Sawbridgeworth Vision

Do you agree with the emerging LDF Vision for Sawbridgeworth?

17 people/organisations provided comments in relation to Question 35. These included:

- 5 Individuals
- 6 Developers/landowners/agents/businesses
- 5 Stakeholders/organisations:
 - Epping Forest District Council
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council – Passenger Transport Unit
 - Natural England
 - Rivers Nursery Site & Orchard Group
- 1 Town Council:
 - Sawbridgeworth

Q35 - Summary Comment	Q35 - Detailed Comment
Support for vision	<ul style="list-style-type: none"> • General support • Welcome the recognition that Sawbridgeworth meets the needs of not only its residents but those living in the rural area. • New developments should be well-connected to the town. • Provided coalescence with surrounding towns and villages does not occur. • Needs more detail to provide certainty on how it can and will be delivered
Disagree with vision	<ul style="list-style-type: none"> • Generic statements and vague aspirations that could apply to anywhere will not lead to a deliverable and worthwhile plan. • Consultation misunderstands the geographical and economic structure of the parish which should refer to the whole civic parish to include Spellbrook.
Natural Environment	<ul style="list-style-type: none"> • Thought should be given to the potential of the river/canal in the life of the town. • Needs to place more emphasis on protecting wildlife sites and natural environment
Rivers Nursery Site and Orchard - protect	<ul style="list-style-type: none"> • Traditional Orchard is a priority habitat in the UK BAP. Recognised as the holy grail of English fruit production. • It is a special place which has contributed to the importance of the town, the past economic and social wellbeing that affects the majority of residents and is a managed community open space.
Rivers Nursery Site and Orchard - develop	<ul style="list-style-type: none"> • Enable some residential development which seeks to protect the nursery and orchard site, create a new nature reserve and provides retirement and market accommodation and hospital expansion
Infrastructure	<ul style="list-style-type: none"> • Sustainable travel options should be encouraged
Town Centre	<ul style="list-style-type: none"> • Need to protect and enhance town centre but also provide a flexible approach to uses in order to enable alternative uses that support the town centre and encourage visitors.
Type of housing	<ul style="list-style-type: none"> • Social housing should be kept completely separate from private housing.
Opposition to development in Sawbridgeworth	<ul style="list-style-type: none"> • Any directions of growth would require amendments to the Green Belt boundary.
Opposition - option 1 (urban area infill)	<ul style="list-style-type: none"> • Limited opportunities to accommodate further development within the built up area without comprehensive redevelopment schemes being pursued. Doubt as to the viability and suitability of these schemes being able to deliver the new dwellings people want.
Support - Option 2 (south west)	<ul style="list-style-type: none"> • Smaller scale development than implied in the CS could be contained within the existing settlement pattern and would involve unattractive countryside. Smaller scale land releases from the Green Belt would not lead to urban sprawl or coalescence (particularly if no North of Harlow). • Most logical direction for some growth to meet part of the housing requirement for Sawbridgeworth.
Opposition - option 3 (west)	<ul style="list-style-type: none"> • Land is open, prominent and exposed with few features to contain development. Involves release of land from the Green Belt. Result in urban sprawl into attractive open countryside to the west of Sawbridgeworth.
Opposition - option 4 (north)	<ul style="list-style-type: none"> • Land is open, prominent and exposed with few features to contain development. Involves release of land from the Green Belt. Result in urban sprawl along the A1184 into attractive open countryside to the north of Sawbridgeworth.

ESSENTIAL REFERENCE PAPER 'N': CHAPTER 8 - WARE

Question 36: Growth Options for Ware

Please rank the growth options for Ware in order of preference, and comment on their suitability. Are there any options we have not considered?

135 people/organisations provided comments in relation to Question 36. These included:

- 112 Individuals
- 12 Developers/landowners/agents/businesses
- 9 Stakeholders/organisations:
 - Environment Agency
 - Epping Forest District Council
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council, Passenger Transport Unit
 - Lee Valley Regional Park Authority
 - Save Our Green Spaces (SOGS) representing Ware South
 - Stop Stansted Expansion
 - Thames Water Property Services Ltd
 - The Ware Society
- 2 Town and Parish Councils:
 - Stanstead Abbots
 - Ware

Q36 - Summary Comment	Q36 - Detailed Comment
Option 1	<ul style="list-style-type: none"> • Need to prioritise this • Shortage of land within the town • May exacerbate flood risk • Keep pressure off town centres • Prioritise brownfield land • Need to preserve the character of the town; concerned that development could damage the character of the town
Option 2	<ul style="list-style-type: none"> • This is the least constrained in terms of environmental designations. Need to consider strategic gap with Thundridge • Outside flood plain but need to consider River Rib • Nun's Triangle is part of a Registered Garden (Poles Park) • Minimal impact on the character of the town • Has most going for it, but Musley Hill and High Oak Road are already congested • Avoid 'Cow Fields' area between Wodson Park and High Oak Road, which is well used by local residents for walking and local events • Good access to A10 • Downward slope to north could make it difficult to design a cost effective sewerage system • Easier to ensure access to bus services and development could be arranged around the main north/south corridor. Existing bus services are contracted and would have greater opportunity to strengthen these
Option 3	<ul style="list-style-type: none"> • Good integration with town via numerous access stubs. • Proximity to bus routes • Would cause considerable traffic problems for traffic accessing the town or A10 unless a significant new road network was provided. • In terms of transport provision it would be less sustainable as more remote from the town centre and existing transport provision. It is likely that a new or diversion of existing route would be required to access the location. • Low flood risk
Option 4	<ul style="list-style-type: none"> • Only suitable for flats, contrary to SHMA recommendations • Flood risk • Potential negative impact on the Lee Valley Regional Park • Concerns about coalescence with Stanstead Abbots
Option 5	<ul style="list-style-type: none"> • Threat to strategic gap with Hertford - coalescence • Poor access • Minimal impact on the character of the town • Remote from town centre and has poor links to existing passenger transport provision. Additional services will be necessary and probable on-going subsidy will be required. • Development would enable community benefits in allowing finance for completion of Ware Campus of Hertford Regional College
Infrastructure	<ul style="list-style-type: none"> • Infrastructure cannot cope • Including congestion issues • Consider funding • Development should not come forward ahead of the necessary infrastructure upgrades
Oppose growth of Ware	<ul style="list-style-type: none"> • Oppose more development • Oppose 3500 homes • No development in the Green Belt • No building on agricultural land
Support the growth of Ware	<ul style="list-style-type: none"> • To provide homes near workplace

Q36 - Summary Comment	Q36 - Detailed Comment
Other options	<ul style="list-style-type: none"> • Expansion of Great Amwell south of Ware, which has good transport links. A10 is a defensible boundary
	<ul style="list-style-type: none"> • Routes north of Ware: High Cross, Colliers End, Puckeridge
	<ul style="list-style-type: none"> • Watton at stone and Stanstead Abbots because they have rail links;
	<ul style="list-style-type: none"> • use the Olympic Stadium
	<ul style="list-style-type: none"> • Build on stilts between New River and River Lea west of Ware
	<ul style="list-style-type: none"> • South of Royston area
	<ul style="list-style-type: none"> • Build a new town
	<ul style="list-style-type: none"> • Prioritise empty properties
Misc	<ul style="list-style-type: none"> • Need something for young people to do
	<ul style="list-style-type: none"> • The approaches to Ware must be preserved in terms of general ambience
	<ul style="list-style-type: none"> • Build a mixture of houses and flats
	<ul style="list-style-type: none"> • Access to major roads is important
	<ul style="list-style-type: none"> • Risk of coalescence with Hertford or surrounding villages
Site Specific Comments	<ul style="list-style-type: none"> • Crane Mead
	<ul style="list-style-type: none"> • Near Great Amwell
	<ul style="list-style-type: none"> • Baldock Street Car Park
	<ul style="list-style-type: none"> • Land East of Trinity Centre
	<ul style="list-style-type: none"> • Ware Library
	<ul style="list-style-type: none"> • 2b Star Street
	<ul style="list-style-type: none"> • Agricultural Nursery adjacent to Presdales School, Hoe Lane
	<ul style="list-style-type: none"> • Hertford Rugby Club, Hoe Lane
	<ul style="list-style-type: none"> • Little Acres, Hoe Lane
	<ul style="list-style-type: none"> • Chadwell Springs
	<ul style="list-style-type: none"> • Option 5 landowner joint response
	<ul style="list-style-type: none"> • Land East of Ware

Comments received in respect of other Chapters

Chapter 3: Development Strategy

Q36 - Summary Comment	Q36 - Detailed Comment
Housing target	<ul style="list-style-type: none"> • Question need for so many homes
	<ul style="list-style-type: none"> • Ignore target-driven options and build according to actual local needs and budgets

Question 37: Approaches to development in Ware

Please rank the approaches to development in Ware in order of preference. Is there another approach we have not considered?

17 people/organisations provided comments in relation to Question 37. These included:

- 5 Individuals
- 7 Developers/landowners/agents/businesses
- 4 Stakeholders/organisations:
 - Environment Agency
 - Epping Forest District Council
 - Richard Hale Association
 - The Ware Society
- 1 Parish Council:
 - Stanstead Abbots

Q37 - Summary Comment	Q37 - Detailed Comment
Lower Density Support	<ul style="list-style-type: none">• Any further growth in Ware should be family houses only – already far too many small flats in the town. The number of these should be extremely limited and built on brownfield sites only. This is essentially a low to no-growth approach for the town.• Lower density does not mean higher land take and has better living conditions.
Medium Density Support	<ul style="list-style-type: none">• Currently an excess of High Density development (flats) in Viaduct Road, Crane Mead, Star Street and other central areas. More medium density housing for families required.• Ware Society: Choice based on desire to maintain town as a pleasant place in which to live, work and take leisure. Whilst it is true that some older high-density housing is now regarded as desirable, modern developments of this nature are less so. High-density housing with narrow roads and restricted car parking facilities are undesirable. While it is appreciated that lower density housing will require more land take, this is a price that needs to be paid for the protection of our town and the wellbeing of the residents.
Medium Density Comment	<ul style="list-style-type: none">• Marginally better than 3
Higher Density Support	<ul style="list-style-type: none">• Epping Forest DC: A higher density is preferred, in order to effectively concentrate homes near services, and to minimise take up of Greenfield land, and land with natural conservation value. It would also make use of the available land in the most efficient way.• Vital to avoid any coalescence with neighbouring settlements, and to stay away from the flood plain and wildlife sites of nearby settlements. Lowest land take supported.
Higher Density Comment	<ul style="list-style-type: none">• Unsuitable for a country town. All land should have the same dph!
No ranking of approach	<ul style="list-style-type: none">• Impossible to rank "general approaches". Across the district as a whole, densities need to be maximised and this is particularly so in the towns and it also depends if it is a net or gross figure. By way of example, high density buildings in a parkland setting may be more appropriate on the edge of the town as opposed to a "low density" traditional estate.• Density can only be determined on a site by site basis given it is intrinsically linked to detailed design. However, we refer to our comments made under question 24 above, which highlights the importance that the choice of development strategy, in terms of broad locations for growth, will have in regard to the provision of an appropriate mix of homes for Ware and the district as a whole. SHMA outlines that market housing in East Herts 71.7% should be 3 bedrooms or larger - a high proportion of flats have been delivered in Ware in recent years. If this balance is to be redressed housing allocations to be in locations appropriate for houses rather

Q37 - Summary Comment	Q37 - Detailed Comment
	<p>than flatted development, in the interests of providing for a mixed community in accordance with PPS3, which outlines the requirement for an evidence based approach to the provision of an appropriate housing mix.</p> <ul style="list-style-type: none"> Do not believe it is possible or realistic to seek to define development densities on a town-wide basis. Rather, development densities should reflect the character, context and potential of individual development sites, with the Core Strategy simply providing a commitment to maximise the development potential of individual sites.
No Preference	<ul style="list-style-type: none"> Environment Agency: Decisions on densities will be affected by flood risk considerations and should be informed by the Strategic Flood Risk Assessment. To promote sequentially preferable sites it may be necessary to promote higher density developments in order to avoid encroaching into the floodplain. Where flood risk is not a constraint to development, lower densities may be achievable.
Other Approach Not Considered	<ul style="list-style-type: none"> Richard Hale Assn: Alternative approach suggested that reflects the character of the areas affected by growth. Density should accordingly be consistent with the density of existing neighbouring residential areas, but adjusted upwards where this density is very low, to allow a range of property types to be built. A mixture of density.
Support for Sites	<ul style="list-style-type: none"> South of Ware as part of Great Amwell Village

Comments received to Q37 in respect of other issues in Chapter 6

Q37 - Summary Comment	Q37 - Detailed Comment
Q36 - Growth Options	<ul style="list-style-type: none"> Approach to development in Ware should occur by way of segregated expansion further to the south of Ware as part of Great Amwell village. This will have regard to the constrained nature of Ware and provide sustainable growth by way of a separate expansion of Great Amwell, whilst protecting and avoiding coalescence with Ware. Expansion to the south of Ware at Great Amwell would benefit from the public transport links to Ware, but will remain separated from Ware by Post Wood and Presdales. Expansion of Great Amwell provides alternative to direct expansion of Ware by benefiting from sustainable links along Amwell Hill and containment within the A10 bypass Stanstead Abbots Parish Council: We support East Herts Council's commitment to avoid coalescence into Stanstead Abbots and therefore think that option 4 on page 220 is undesirable.

Question 38: Ware Vision

Do you agree with the emerging LDF Vision for Ware?

23 respondents provided comments in relation to Question 38. These included:

- 4 Individuals
- 9 Developers/landowners/agents/businesses
- 9 Stakeholders/organisations:
 - Environment Agency
 - Epping Forest District Council
 - Hertford Regional College
 - Hertfordshire Biological Records Centre
 - Lee Valley Regional Park Authority
 - Natural England
 - Richard Hale Association
 - Sport England
 - The Ware Society
- 1 Parish Council:
 - Stanstead Abbots

Q38 - Summary Comment	Q38 - Detailed Comment
Support	<ul style="list-style-type: none"> • Support • Natural England: supports the emerging LDF Vision for Ware in 2031 • The emerging LDF vision for Ware seems appropriate given the history and geography of the town. • The Ware Society: It would appear that this is very much aspirational and continuous monitoring and development will be essential if the objectives are to be achieved. • Unfortunately a vision and action are two different things - the former is normally expendable when it is deemed necessary. Vision is too weak a word but agree with the sentiment.
Partly Agree	<ul style="list-style-type: none"> • Support • Agree with the goal established here, with caveat that it is possible to achieve only if there is very little or no growth in the town. Any building on greenbelt land or substantial infilling of green space within the town will negate the stated goals, drastically reducing the standard of living in the town and spoiling its small country town character. • Hertfordshire Biological Records Centre: The vision must protect the natural environment including the river, habitats and the species they support. • If vision is adhered to, it would be suitable for Ware. If too many dwellings (particularly more flats) are built, it would completely alter Ware as 'an attractive town and pleasant place to live'.
Object	<ul style="list-style-type: none"> • The "emerging visions" for the towns may be appropriate in other Council documents but they do not add anything to the Core Strategy and should not be included in a document intended to provide for and guide development. In the September 2009 guidance document resulting from the experience of examining DPDs, PINS states that such documents should be clear and succinct - "Generic statements and vague aspirations that could apply anywhere will not lead to a deliverable and worthwhile plan". • Cannot see how the LDF vision for Ware can be achieved given the scale of growth envisaged for Ware under all options and the need for the majority of this growth to be provided by Greenfield development.
Additional Matters Required in Vision	<ul style="list-style-type: none"> • It is surely inevitable that under any chosen Development Strategy there will be greenfield/Green Belt development around the district's towns, and it is misleading not to acknowledge this in the Vision. • Hertford Regional College: Note that the vision refers specifically to the importance of primary and secondary schools in achieving high education attainment. Consider the vision should also refer specifically to further and adult education provision (given the references to this at paragraph 2.8.1). Suggested amended wording: • <i>High educational attainment will be maintained and. Suitably sited primary and secondary schools will enable all of Ware's children to be educated within appropriate catchment areas. Ware will form a focal point for excellence in further, higher and adult education, servicing the District as a whole. Ware's community spirit will endure and opportunities for social interaction will increase.</i> • Environment Agency: The vision would benefit from a direct reference to managing flood risk and using new development to contribute to reducing existing flood risk wherever possible. • No mention of the flood plain. • Ware is not large enough to support a cinema or theatre and will attract more cars to a congested town. • Lee Valley Regional Park: References to the Regional Park welcomed within this section, but wish to see the Park referenced in the emerging draft vision. The last paragraph should read: • <i>"Continued protection and enhancement of the River Lea, the Lee Valley Regional Park and other open space, together with the preservation of existing</i>

Q38 - Summary Comment	Q38 - Detailed Comment
	<p><i>trees and new landscaping within the town will help Ware adapt to climate change"....</i></p> <ul style="list-style-type: none"> • Vision should include provision for expanding existing key businesses in and around Ware. The Vision for Ware refers to the need for the town centre to continue to provide a range of retail services and other facilities and to maintain its vitality. However, this does not cater for any policy guidance concerning existing major business outside the town centre, in particular Van Hage. • The Vision does not reflect the current recognised shortfall in retail provision for Ware. • Sport England – While overall vision broadly supported, core strategy needs to address land use implications for Ware of the playing pitch strategy as deficiencies in the area are particularly significant e.g. the need for additional playing pitches would justify new sites being identified for outdoor sport and/or major new development should incorporate outdoor sports provision.
Other Ware Related Comments	<ul style="list-style-type: none"> • Support emphasis on retaining Ware's function as a key employment base for the district. For a town with significant areas of employment accommodation and buoyant land values there will however be inevitable tension between maintaining suitable employment sites and the pressure to release sites for higher value purposes. Evidence from PPS3, PPS4 to support view that • There may be considerable pressure for existing employment sites to be converted to residential uses, particularly where old estates require redevelopment and investment. Land value issues (employment and residential) raised.
Support for Sites	<ul style="list-style-type: none"> • South of Ware as part of Great Amwell Village. • Van Hage Garden Centre

Comments received to Q38 in respect of other issues in Chapter 6

Q38 - Summary Comment	Q38 - Detailed Comment
Q36 - Growth options	<ul style="list-style-type: none"> • Stanstead Abbots Parish Council: We support East Herts Council's commitment to avoid coalescence into Stanstead Abbots and therefore think that option 4 on page 220 is undesirable.

ESSENTIAL REFERENCE PAPER 'O': CHAPTER 9 - VILLAGES

Question 39: Approach to Development in the Villages

Please rank the approaches to development in the villages in order of preference? Is there another approach we have not considered?

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

- 19 Individuals
- 10 Developers/landowners/agents/businesses
- 6 Stakeholders/organisations including:
 - Environment Agency
 - Epping Forest District Council
 - Haileybury School
 - Lee Valley Regional Park
 - Tewin Residents Group
 - The Thatching Information Service
- 9 Town and Parish Councils including:
 - Aston
 - Bramfield
 - Braughing
 - Great Munden
 - Standon
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Thundridge

Q39 - Summary Comment	Q39 - Detailed Comment
Density generally	<ul style="list-style-type: none"> • Density should only be determined on a site by site / village by village basis • Design should take precedence over any artificial notions of minimum density • Lower/medium density jointly preferred • Providing houses for people who will by necessity have to commute to places of work whether that housing is high or low density and depleting the already scarce resource of agricultural land does address the problems of the region as a whole
Lower density	<ul style="list-style-type: none"> • The least unacceptable development in villages would be lower density, however, even this is unacceptable and generally unwanted by local people • Lower density makes more sense as the nature of village life is by definition non-urban • Family homes should be lower density
Medium density	<ul style="list-style-type: none"> • For village extensions a medium density of 30-40 dwellings/ha should be the norm, whilst respecting urban design and landscape criteria • Starter homes should be medium density • If you are using this information simply to generate numbers of houses and land area utilised by the end of the period average it out on medium but please do not apply this as the recommended approach when individual developments are being considered • Medium density preferred assumption for a 'rule of thumb' exercise
Higher density	<ul style="list-style-type: none"> • Higher density is preferable in order to safeguard green belt/countryside, but sometimes medium density would enable more self-sufficiency in terms of vegetable growing and children's safe play space • Higher density preferred to concentrate homes near service and to minimise greenfield/green belt land • Higher density but no more than 12 dwellings in any one development
Neighbourhood planning	<ul style="list-style-type: none"> • Follow parish plans • Allow communities to decide what is most appropriate • Stanstead Abbots Parish Council wish to record their intention to develop a Parish Plan
Miscellaneous	<ul style="list-style-type: none"> • Development needs to be considered from a different viewpoint. The main criterion should be – does the village/town need development to remain a sustainable community? • Adding houses to villages does not in itself keep them vibrant, there also has to be local employment opportunities • There is an excess of large detached executive dwellings in the district and a limit should be imposed; more semi's with room for later growth are needed • There should be no major increases in population density until the necessary infrastructure is in place • Logical infill only – no linear expansion • Decisions on densities will be affected by flood risk considerations and should be informed by the SFRA. In order to promote sequentially preferable sites it may be necessary to promote higher density developments in order to avoid encroaching into the floodplain. Where flood risk is not a constraint to development, lower densities may be achievable • Care should be taken to minimise development in the villages or they will cease to be villages
Ranking Only	<ul style="list-style-type: none"> • Ranking explanation only, no additional comments made
Site Specific Comments	<ul style="list-style-type: none"> • Burrs Meadow, Standon • Land at High Trees Farm, Chapmore End • Land at Amwell Place Farm, Hertford Heath • The Wilderness, Stanstead Abbots • Watton-at-Stone Depot, Station Road, Watton-at-Stone

Comments received to Q39 in respect of other issues in Chapter 9

Q39 - Summary Comment	Q39 - Detailed Comment
Q40: Village Identification	<ul style="list-style-type: none"> • Braughing should not be identified as a Larger Service Village • Stanstead Abbots and St Margarets is incorrectly identified as a Larger Service Village; it should be a town • Stanstead Abbots is incorrectly identified as a Larger Service Village for the following reasons: <ul style="list-style-type: none"> • Much of the village lies in a flood risk area • The primary school is now at capacity • Rail passenger congestion and limited bus service
Policy	<ul style="list-style-type: none"> • There is a need for new and explicit smaller village related policies which will support village service and enable village residents to stay in the village in which they live
Stanstead Abbots	<ul style="list-style-type: none"> • The Lee Valley Regional Park Authority is concerned about the impact of growth on the Park in relation to options for Stanstead Abbots and St Margarets
Conversion of employment land/premises to residential	<ul style="list-style-type: none"> • Issue raised in respect of Stanstead Abbots; wish to retain and sustain a thriving High Street economy

Comments received to Q39 in respect of other Chapters

Chapter 2: Key Issues and Vision

Q39 - Summary Comment	Q39 - Detailed Comment
Theme 3: Housing	<ul style="list-style-type: none"> • East Herts should carry out a needs assessment for the types of dwellings that are needed in each area • New social housing must give priority to local people on the housing register
Theme 4: Character	<ul style="list-style-type: none"> • Support for Strategic Objectives CHA 1-4
Theme 6: On the Move	<ul style="list-style-type: none"> • Transport infrastructure is already strained
Theme 9: Monitoring & Delivery	<ul style="list-style-type: none"> • Any development in Stanstead Abbots needs to take account of capacity constraints at Rye Meads

Chapter 3: Development Strategy

Q39 - Summary Comment	Q39 - Detailed Comment
Development Strategy	<ul style="list-style-type: none"> • The SHMA outline that for market housing in East Herts 71.7% should be 3 bedrooms or larger, in part to reverse the trend of providing flatted developments. Housing allocations must therefore be in locations which are appropriate for houses rather than flats • Allocation of numbers of houses to Smaller Service Villages in Option C must be based on need • Option B is considered to best reflect national planning guidance • It is not necessarily the larger villages that need to expand; modest growth can assist small village communities while also providing affordable housing • Option F is the 'Jeremy Clarkson solution' • Option F might attract a disproportionate number of commuters
Green Belt	<ul style="list-style-type: none"> • East Herts should plan for development without impacting on the Green Belt
Flooding	<ul style="list-style-type: none"> • In the east of the county in particular there is an increased threat of flooding and building in these areas will make matters worse

Question 40: Identifying Types of Village

Is our approach to identifying three types of village (Larger Service Villages, Smaller Service Villages and Other Villages / Hamlets) correct?

52 people/organisations provided comments in relation to Question 40. These included:

- 23 Individuals
- 14 Developers/landowners/agents/businesses
- 2 Stakeholder/organisations including:
 - Epping Forest District Council
 - Haileybury School
- 13 Parish Councils including:
 - Aston
 - Bayford
 - Braughing
 - Brickendon Liberty
 - Cottered
 - Great Munden
 - Hertford Heath
 - Standon
 - Stanstead Abbots
 - Tewin
 - Thundridge
 - Walkern
 - Watton-at-Stone

Q40 - Summary Comment	Q40 - Detailed Comment
Support	<ul style="list-style-type: none"> • Approach to 3 types of villages • Approach correct but query allocation of villages • Approach correct/reasonable but must consider needs of village individually • Largely correct except where 'other villages' are located in an existing transport corridor • Fine as a high level planning exercise, but open to challenge from individual villages
Overall approach	<ul style="list-style-type: none"> • Too general; villages should be considered individually • More categories of village required e.g. large villages with few amenities; large villages with good amenities • Potential for 'village clusters' • Identification of villages should have regard to access to public services (including public transport) and sustainability, not just size and level of services • What is a 'limited range of local facilities'? • All villages need some limited development • Would prefer continuation of Local Plan categorisation (i.e. Category 1, 2 & 3) • New development should be located where there is the greatest potential for achieving sustainable development • Not villages in transport corridors – few are within walking distance on a station
Sustainability trap	<ul style="list-style-type: none"> • Potential for smaller service villages and other villages/hamlets to evolve through accommodating growth and thereby avoiding a 'sustainability trap'
Neighbourhood Planning	<ul style="list-style-type: none"> • Role of neighbourhood plans and community right to build
Site specific comments	<ul style="list-style-type: none"> • Half Acres, Stortford Road, • Land north west of Great Amwell

Comments received to Q40 in respect of other issues in Chapter 9

Q40 - Summary Comment	Q40 - Detailed Comment
Categorisation of villages: correctly identified	<ul style="list-style-type: none"> • Stanstead Abbots & St Margarets is correctly identified as a Larger Service Village • Braughing is correctly identified as a Larger Service Village
Categorisation of villages: incorrectly identified	<ul style="list-style-type: none"> • Hunsdon has been incorrectly identified as a Larger Service Village • Braughing has been incorrectly identified as a Larger Service Village • Standon/Puckeridge should be considered together as a Larger Service Village • Great Amwell is a sustainable location for development – proximity to Ware gives it an advantage over other larger villages • Brickendon has been incorrectly identified as a 'Smaller Service Village'; it should be categorised as an 'Other Village/Hamlet' • Tewin has been incorrectly identified as a Larger Service Village; it should be a Smaller Service Village • Stanstead Abbots & St Margarets should retain its classification as a main settlement • Stanstead Abbots and Watton-at-Stone offer a better prospect for sustainable development than Buntingford even though it is a larger settlement • Detailed comments on whether or not Stanstead Abbots is correctly identified as a larger Service Village • Walkern lacks most of the facilities that many other Category 1 Villages have
Historic Character	<ul style="list-style-type: none"> • In Braughing particular attention should be paid to the character and significance of the historic environment
Miscellaneous	<ul style="list-style-type: none"> • Inconsistency between maps as to how Stanstead Abbots is portrayed – sometimes on its own, sometimes with St Margarets

Comments received to Q40 in respect of other Chapters

Chapter 3: Development Strategy

Q40 - Summary Comment	Q40 - Detailed Comment
Housing Figure	<ul style="list-style-type: none"> • 'To find' housing figure is too high as East of England Plan has been revoked
Option F	<ul style="list-style-type: none"> • A disadvantage of Option F could be that development on transport corridors could attract a disproportionate number of commuters – resulting in dormitory villages
Q23: Approaches to housing distribution	<ul style="list-style-type: none"> • Cannot support proposed approaches as they are based on simple numerical divisions without reference to the potential for achieving sustainable development. The Core Strategy should consider potential development strategies which would allow a more nuanced approach to the level of development to be allocated to each settlement

Question 41: Village Identification

Have we identified the correct villages under each village type?

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

- 222 Individuals
- 15 Developers/landowners/agents/businesses
- 4 Organisations including
 - Broxbourne Woods Area Conservation Society
 - Epping Forest District Council
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council – Passenger Transport Unit
 - Tewin Residents Group
 - The Thatching Information Service
- 10 Town and Parish Councils including:
 - Aston
 - Braughing
 - Brickendon Liberty
 - Cottered
 - Hertford Heath
 - Standon
 - Stanstead Abbots
 - Tewin
 - Walkern
 - Watton-at-Stone

Q41 - Summary Comment	Q41 - Detailed Comment
General support for approach	<ul style="list-style-type: none"> • Identification of Larger and Smaller Service Villages seems reasonable • Depends on your definitions but it looks about right • Support categorisation identified, but provision needs to be made for villages to become more sustainable • General support, but there should be no significant development
Village has been <u>correctly</u> identified	<ul style="list-style-type: none"> • Aston is correctly identified as a Smaller Service Village • Braughing is correctly identified as a Larger Service Village • Hertford Heath is correctly identified as a Larger Service Village • High Cross is correctly identified as a Larger Service Village • Hunsdon is correctly identified as a Larger Service Village • Stanstead Abbots & St Margarets is correctly identified as a Larger Service Village • Walkern is correctly identified a Larger Service Village • Watton-at-Stone is correctly identified as a Larger Service Village
Village has been <u>incorrectly</u> identified	<ul style="list-style-type: none"> • No development in or around Aston • Aston is more like a hamlet • Bayford could be a centre for development based on the railway station • Benington should be a Larger Service Village • Support for Benington as a Smaller Service Village but only if these villages are allowed a reasonable and flexible margin for future housing growth • Braughing is not a Larger Service Village • Braughing should be a Smaller Service Village • Brickendon is not a service village • Brickendon should be an Other Village/Hamlet • Buntingford should be a Larger Service Village • Although Buntingford is a town, it is very different to in terms of size, populations and infrastructure to the other 4 • Dane End should be identified for expansion because of traffic and flooding issues • Great Amwell should be a Larger Service Village • Great Amwell should be an Other Village/Hamlet • Hertford Heath should not be a Larger Service Village • Hertford Heath should be a Smaller Service Village • High Cross is not a Larger Service Village • High Cross should be a Smaller Service Village • High Cross should be an Other Village/Hamlet • High Wych should be considered with Sawbridgeworth • High Wych should be a Larger Service Village • Hunsdon is not a Larger Service Village • Hunsdon should be a Smaller Service Village • Little Hadham should see some growth • Much Hadham should be a Smaller Service Village • No development in Much Hadham • Puckeridge is not a Larger Service Village • Puckeridge should be a Smaller Service Village • Puckeridge should be a town • To identify Puckeridge as being capable for expansion shows a lack of local knowledge; it is gridlocked with congestion, parking is an issue and the original village has largely disappeared within mass low-grade housing • Sawbridgeworth should be a Larger Service Village • Sawbridgeworth is not the same scale as Bishop's Stortford, Hertford, Ware etc • Standon/Puckeridge should be a Larger Service Village

Q41 - Summary Comment	Q41 - Detailed Comment
	<ul style="list-style-type: none"> • No more development should take place in Standon/Puckeridge • Standon should be a Larger Service Village • Standon should not be identified for expansion; the High Street is used as car park and the charm of the village has disappeared as it is used as a rat run, a further issue is the loss of local employment • Stanstead Abbots is a town and is much larger than other Larger Service Village e.g. Hunsdon and Puckeridge • Stanstead Abbots and St Margarets should retain its current categorisation as a settlement between the district's main towns and larger villages in the development hierarchy • Stanstead Abbots is not a Larger Service Village • The three Parishes of Stanstead Abbots, St Margarets and Great Amwell have separate identities • Stapleford should be an Other Village/Hamlet • Tewin should not a Category 1 Village – it should be re-designated as a Category 2 Village • Tewin is a small village, not a service village • Tewin is not a Larger Service Village • Tewin should be a Smaller Service Village • Thundridge is not a Smaller Service Village • Thundridge should be a Larger Service Village • Thundridge/Wadesmill should be a Larger Service Village • The Local Plan Inspector concluded that Thundridge/Wadesmill should be a Category 1 Village • Walkern is not a Larger Service Village • Walkern has suffered a disproportionate level of development over past years as result of inappropriate categorisation of village as a Category 1 Village • Walkern should be a Smaller Service Village • Not Watton-at-Stone • Watton-at-Stone should be a Smaller Service Village • Widford is not a Smaller Service Village • Widford should be a Larger Service Village • Why are Watton-at-Stone & Stanstead Abbots Larger Service Villages and Buntingford is a town? • Datchworth seems larger than Tewin but they are identified the other way round • Tewin has fewer facilities than Datchworth – one is wrong • Whilst some villages may be large (e.g. Much Hadham Hunsdon & Puckeridge) they have few facilities & services
Other villages which should be identified	<ul style="list-style-type: none"> • Ardeley Parish should be a Category 2 Village, which includes hamlets • Albury should be a Smaller Service Village • Anstey should be a Smaller Service Village • Aston End could accommodate some development • Barley should be a Smaller Service Village [NB not in district] • Barkway should be a Larger Service Village [NB not in district] • Barkway should be a Smaller Service Village [NB not in district] • Bramfield should be a Smaller Service Village • Brent Pelham should be included • Clavering should be a Smaller Service Village [NB not in district] • Cottered should be a Smaller Service Village • Cottered should be a Larger Service Village • Dane End should be a Smaller Service Village • Eastwick should be a Smaller Service Village

Q41 - Summary Comment	Q41 - Detailed Comment
	<ul style="list-style-type: none"> • Gilston should be a Smaller Service Village • Great Hormead should be a Smaller Service Village • Hare Street should be a Smaller Service Village • Hertingfordbury should be a Smaller Service Village • What about Hertingfordbury • Little Berkhamsted should be a Smaller Service Village • Stocking Pelham should be a Smaller Service Village • Tonwell could sustain some growth for young families • Wareside should be a Smaller Service Village • Westmill should be a Smaller Service Village • Why are Hare Street / Aspenden not included? • Add Tewin Wood, Digswell and Harmer Green also Oaklands & Woolmer Green [NB not all in district]
General comments on overall approach	<ul style="list-style-type: none"> • The basis for the identification of villages under each village type should be published and updated where applicable • Build away from existing towns and villages, e.g. A120/A10 corridor, M11 near Stansted, North/South Duxford • Need to consider infrastructure first, including access to passenger transport • Priority should be given to settlements with access to rail and other facilities, (e.g. Watton-at-Stone, Stanstead Abbots) • Only develop brownfield sites in villages, no incursion into the Green Belt • Designation irrelevant as expansion of any village would require uneconomic investment in infrastructure • Concentrate development in the towns and larger villages • No development in villages • Villages are unique and don't need development to spoil their beauty and quality • Keep villages rural • Expand towns • No development in smaller villages due to lack of infrastructure and to protect countryside, water resources etc • To simply group villages together which may benefit a few shops or schools but ignores existing problems of traffic, local employment etc is grossly neglectful • None of the 'larger' service villages have all of the following – enough vehicle access/parking, more than 1 shop, a doctor, public amenities – developers cannot be made to provide or service this support • Every village, however small it is, needs some (low cost) housing for young / local people • Every village should have houses built to take the strain off the major roads • All villages should have a small amount of growth to share the pain and to ensure gradual evolution • Limited development in Smaller Service Villages is an ideal way to spread the overall development required, without in any way spoiling the overall appeal of East Herts • Count all villages on an equal basis • Categorisation of some smaller serviced villages and hamlets is incorrect base on transport links • Need to consider whether adding growth to a particular village would change its category – if you develop a village it stops being a village; if you develop a town, you rarely change its nature • Possibly build in the smaller villages and distribute houses for local people to live in, allowing a real village community • Clarify how many services are required when distinguishing between smaller service villages and other villages/hamlets • Smaller and larger service villages seems a fair description; towns should also be split

Q41 - Summary Comment	Q41 - Detailed Comment
	<p>into 'large' and 'small' depending on a) road network b) transport network c) shopping facilities</p> <ul style="list-style-type: none"> • Ranking not possible without costed infrastructure plans • The smaller the village the less houses. But they must be in character and for local people with local jobs • Development in Smaller Service Villages should be according to local need • Cannot comment on Other Villages/Hamlets as these have not been listed • Query over Other Villages/Hamlets because of numbers involved plus how they are defined • Some villages like Wadesmill and Thundridge are on relatively major roads whilst others like Much Hadham are tucked away with few transport links • Putting people in villages means they get straight in their cars to drive to the towns, we must have less car use • Most villages large or small require a car, think carbon footprint • Some Larger Service Villages were previously classified a (2) not (1), they should now return to that status • Why are Little Hadham and Hadham Ford separate whereas Much Hadham and Hadham Cross are joined to make a larger village? • One third of the population of East Herts live in the rural areas. By increasing the housing in rural areas this could help the sustainability of the rural area i.e. greater viability for shops and bus services and lessen the urban growth of the main towns • Incorporate the villages but keep their character and improve their facilities i.e. transport and schools • There are more viable options just over District borders e.g. Barkway / Barley • Small net changes to villages using residential property as an incentive for developers to build new retail and service areas • Every village 100 homes, to help local schools, shops, amenities etc. Roads would not have to be major • No development in High Cross, Wadesmill and Thundridge – you have spent millions of pounds by-passing and quietening these villages, do not turn them back into a motorway again • The villages and hamlets should not be expanded but infill where sensible • Do not include very small villages/hamlets. Concentrate on larger villages to make them more sustainable. This may mean linking up with smaller villages close by • Maybe add a few dwellings in all options • No garden grabbing
Neighbourhood Planning	<ul style="list-style-type: none"> • Build in villages, with their consent, this could enable them to support local facilities • Each village should be asked to confirm its designated status. If it disagrees, its wishes should be respected • No problem with the villages under each village type, but this is more for the inhabitants of these villages to comment on
Miscellaneous	<ul style="list-style-type: none"> • Ensure protection of Green Belt between Aston and Stevenage • Build flats (5-6 storeys) to conserve countryside • The classifications identify that a service exists but no consideration is given to their potential for development • Starter homes and retirement homes needed to meet local need • Poor services in villages would result in additional cars travelling to rail stations (commuting) • A usable village should have a shop, post office and pub to avoid unnecessary travel • Town folk and country folk don't mix • Policies needed to support the maintenance of village services, including bus services • Last 2 categories must be included • Walkern has more than enough social housing

Q41 - Summary Comment	Q41 - Detailed Comment
	<ul style="list-style-type: none"> • Concentrate funding for new amenities in larger service villages • Other Villages/Hamlets are not shown on the map • Aston is unique given its proximity to a wide range of facilities in Stevenage • Ask this to the existing MPs and MEPs and explore our area yourselves, on foot and on footpaths. Ask all the organisations such as National Trust, and Natural England and real experts too. • Better public transport services to and between villages • Not qualified to answer this question • Leave it you • Benington no longer has a shop or post office but needs one • The transport links for trains need to be improved greatly. Living beyond Broxbourne is a nightmare - the travel on trains is dire and the bus links are non-existent. • Make sure villages where East Herts councillors live are not saved from development. • No GP Surgery in High Cross • The shop in Thundridge has closed • In villages/hamlets provide small business units / shops with accommodation • When is hamlet a village and when is a village a collection of hamlets? • Groups of 5-10 houses, not 6-10 bedrooms in villages, all with off street parking for a minimum of two cars • Irrelevant plans will not protect village heritage and character • Would like a safe off road route of Restricted Byway Status between Walkern and Stevenage Box Wood • Safeguard the post offices, village schools and local pubs • The problem with development in each of these settlements are roads - overused, public transport - minimal, water drains & other services - pressure. All these villages have too heavy traffic through them
Site specific comments	<ul style="list-style-type: none"> • Land to west of Stanstead Abbots & St Margarets

Comments received to Q41 in respect of other issues in Chapter 9

Q41 - Summary Comment	Q41 - Detailed Comment
Approach to identifying three types of village	<ul style="list-style-type: none"> • More categories of villages required • New category required based on villages with railway stations thereby offering sustainable travel options e.g. Watton-at-Stone, Stanstead Abbots • The distinction between Larger Service Villages and Smaller Service Villages should be further should be further categorised according to access and sustainability. As such, Great Amwell should score higher because of its public transport links and better sustainable location than say Much Hadham • Category of Larger Service Villages seems to be misconceived • The Core Strategy should consider potential development strategies which would allow a more nuanced approach to the level of development to be allocated to each settlement. Settlements such as Watton-at-Stone should be allocated more development than other villages such as High Cross, which do not have the same range of facilities or sustainable transport connections. The consultation document is wrong to include these villages on a par in all of its development strategy options, and further options, based more closely on the principles of sustainable development, must be tested • The village categories are not sufficiently granular. Consider each village on an individual basis
Map	<ul style="list-style-type: none"> • Under Option F Cole Green, Birch Green and Letty Green are wrongly positioned • Inconsistency between maps as to how Stanstead Abbots is portrayed – sometimes on its own, sometimes with St Margarets

Comments received to Q41 in respect of other Chapters

Chapter 2: Key Issues and Vision

Q41 - Summary Comment	Q41 - Detailed Comment
Theme 3: Housing	<ul style="list-style-type: none"> • Repair run down properties and only build new homes when necessary • Make certain large number of homes is really necessary, what about large number of empty homes?
Theme 6: On the Move	<ul style="list-style-type: none"> • Home working should be encouraged to reduce the need to travel

Chapter 3: Development Strategy

Q41 - Summary Comment	Q41 - Detailed Comment
Q22: Development Strategy	<ul style="list-style-type: none"> • Would like to see a development strategy that reflects current realities and needs, rather than outdated assumptions, the desires of developers and as abolished quango • Do not build
Option C	<ul style="list-style-type: none"> • Strong support for Option C provided the allocation of houses is based on need and not pro rata on existing populations
Housing Number	<ul style="list-style-type: none"> • Disagree with the assumption that such large numbers of houses are needed
New Town	<ul style="list-style-type: none"> • Create a new town south of Newport, west of junction 8A M11, with a new train link and station, with Uttlesford and Essex • Don't destroy the character of our towns and villages, build a new town
Green Belt	<ul style="list-style-type: none"> • East Herts needs to oppose review of Green Belt east of Stevenage • Keep Green Belt intact

Question 42: An Emerging Vision for the Villages

Subject to whichever development strategy options we choose, do you agree with our emerging vision for the villages?

39 people/organisations provided comments in relation to Question 42. These included:

- 19 Individuals
- 8 Developers/landowners/agents/businesses
- 5 Stakeholders/organisations including:
 - Environment Agency
 - Epping Forest District Council
 - Haileybury School
 - Hertfordshire Biological Records Centre
 - The Thatching Information Service
- 7 Town and Parish Councils including:
 - Aston
 - Benington
 - Hertford Heath
 - Stanstead Abbots
 - Tewin
 - Thorley
 - Walkern

Q42 - Summary Comment	Q42 - Detailed Comment
Support generally	<ul style="list-style-type: none"> • Vision for each scenario seem to fit the development strategies proposed • Yes with emphasis on the need for affordable housing, better bus routes and scattered development for local families and farmers
Disagree with emerging vision	<ul style="list-style-type: none"> • Too superficial / artificial • Too broad-brush when each village/settlement is unique • Depends on too many external factors • Will not protect character of villages • Will not protect villages from development • Can't agree or disagree until an option is chosen • The vision is cautious / lacks imagination
Option A	<ul style="list-style-type: none"> • There are no problems with the current situation - if people do not wish to travel to services they will not move to the area
Option B	<ul style="list-style-type: none"> • Support vision that larger service villages will be vibrant communities
Option C	<ul style="list-style-type: none"> • This is the only option that provides for some growth in smaller service villages • Support aim to create vibrant rural communities with a choice of social and economic opportunities, however, it should apply to all communities whatever their size
Option D	<ul style="list-style-type: none"> • Option D allows for the villages to react and develop to future demands but only if the change is driven by their local populations in response to local needs • If Option D is chosen, other villages/hamlets should only grow to accommodate local homes for local people where there are jobs to support them, local people must support development, and it should be appropriate in scale and character • Affordable housing is necessary; the minimum amount of land must be used; local employment must be created – only Option D allows this (although vision doesn't quite encapsulate this)
Option E	<ul style="list-style-type: none"> • Vision supported as it protects all villages from development
Option F	<ul style="list-style-type: none"> • Support for development strategy for Great Amwell under Option F
Vision needs amending	<ul style="list-style-type: none"> • The emerging vision for all options should include the words 'their historic character will have been preserved'
Individual village visions	<ul style="list-style-type: none"> • Larger Service Villages should each have their own vision • All villages should have their own vision • Each village has its own character and cannot be 'quantified' in the way that is attempted in the document
Vision - general	<ul style="list-style-type: none"> • Hockerton Housing Project in Nottinghamshire engenders a much closer link between houses and the land – part of the villages vision could be an increase in this type of housing and living • Inter-related settlement groups could share facilities, including development of local energy, waste disposal and sustainable transport networks could be part of an alternative vision for the villages
Neighbourhood planning	<ul style="list-style-type: none"> • Local parish plan / village design statement is the most representative / appropriate way forward – should be adopted by the Council
General village comments	<ul style="list-style-type: none"> • There must be a more flexible approach to future housing / local employment needs and an awareness of the vibrancy that could be created in small pockets of the rural landscape • There should be minimal no/development in villages • Specific policies are needed to support and protect village services • Needs to be a LDF for villages where limited small scale and infill development is allowed for either housing or employment • Village boundaries need to be carefully defined • Areas of green space in villages need to be identified and conserved • The council should continue to vigorously defend Aston End from coalescence with Stevenage

Q42 - Summary Comment	Q42 - Detailed Comment
	<ul style="list-style-type: none"> • Large scale development could result in rural ghettos • Thorley has been ignored in the document, yet it has already suffered from large scale development to the point of near extinction of identity and community well being • There is no mention of flood risk in any of the visions. There are areas of flood risk in the following villages: Braughing, Walkern, High Cross, Standon, Puckeridge, Watton-at-Stone, Stapleford, Thundridge, Wadesmill and Dane End. • Concern that large tracts of land around Hunsdon have been identified in the Call for Sites
Miscellaneous	• Not qualified to answer this question
Document	• Document is too complex and long
Agriculture	• Document lacks any sort of analysis of agriculture

Comments received to Q42 in respect of other issues in Chapter 9

Q42 - Summary Comment	Q42 - Detailed Comment
Identifying types of villages	<ul style="list-style-type: none"> • More granular categories needed • Categorisation of villages is broadly correct • Needs to be an approach based on local demonstrated needs • Villages should be further categorised according to access and sustainability – as such Great Amwell should score higher than say Much Hadham • It is wrong to categorise villages and then treat all villages with each category in the same way.
Village identification	• Thundridge should be identified as a Larger Service Village

Comments received to Q42 in respect of other Chapters

Chapter 2: Key Issues and Vision

Q42 - Summary Comment	Q42 - Detailed Comment
Theme 4: East Herts Character	• It should be mandatory that a small percentage of new building is thatched (using local companies)
Theme 8: Green East Herts	• Concern over the impact of further water from the River Beane upon the environment of the Beane Valley

Chapter 3: Development Strategy

Q42 - Summary Comment	Q42 - Detailed Comment
Development Strategy	<ul style="list-style-type: none"> • Development must be spread equally amongst all towns, villages and hamlets – this is unlikely to significantly change the character of any of them • Any strategy adopted must enable communities to retain separate communities • Inter-related settlement groups are another option for managing settlement planning • Growth must be apportioned between each settlement on the basis of the range of facilities that they provide, their accessibility and their land availability, rather than on a strictly proportional basis
Parking	• Substantial increases in housing should not be approved until necessary parking is provided at stations at affordable prices
Conservation Areas	• Any development should be consistent with and proportionate to the character of Conservation Areas

ESSENTIAL REFERENCE PAPER 'P': CHAPTER 10 - NORTH OF HARLOW

Q43: North of Harlow

a. Do you agree with the consultants Suggested Approach in respect of growth to the north of Harlow?

b. If not, how would you distribute development in accordance with Policy HA1 of the East of England Plan and why?

- Individuals/residents: Part a = 313; Part b = 165
- Developers/landowners/agents/businesses: Part a = 10; Part b = 16
- Stakeholders/organisations: Part a = 23
 - Bishop's Stortford Civic Federation
 - Bishop's Stortford College
 - Broxbourne Woods Area Conservation Society
 - Buntingford Civic Society
 - CPRE – The Hertfordshire Society
 - East Herts Ramblers
 - Environment Agency
 - Epping Forest District Council
 - Essex County Council – Environment, Sustainability & Highways
 - Haileybury School
 - Harlow District Council
 - Hertford Civic Society
 - Hertfordshire Association of Town and Parish Councils
 - Hertfordshire Biological Records Centre
 - Hertfordshire County Council
 - Hertfordshire Gardens Trust
 - Highways Agency
 - Much Hadham Church Council
 - St Margarets Church PCC
 - STOP Harlow North
 - Stop Stansted Expansion
 - The Ramblers' Association
 - The Thatching Information Service
- Stakeholders/Organisations: Part b = 9
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - Epping Forest District Council
 - Harlow Renaissance Ltd
 - Hertfordshire Gardens Trust
 - National Grid
 - Parsonage Residents Association
 - Ramblers' Association
 - Thorley Manor Residents Association

- Town and Parish Councils:

Part a responses = 11

- Bayford
- Eastwick & Gilston
- Hertford
- High Wych
- Hunsdon
- Little Berkhamsted
- Little Hadham
- Much Hadham
- Sawbridgeworth
- Stanstead Abbots
- Widford

Part b responses = 13

- Bayford
- Brickendon Liberty
- Buckland and Chipping
- Eastwick & Gilston
- Great Munden
- High Wych
- Hunsdon
- Little Berkhamsted
- Standon
- Thundridge
- Walkern
- Watton-at-Stone
- Widford

Q43 - Summary	Q43 - Detailed Comments
Comments on specific directions	<ul style="list-style-type: none"> • Development should be to the south not the north; south is nearer the M11; road links are better to the south; south of Harlow needs regeneration
	<ul style="list-style-type: none"> • Develop north of Harlow to leave the Green Belt near Epping Forest
	<ul style="list-style-type: none"> • Development should be to the east up to the M11, not the north. Countryside in this direction has already been compromised
	<ul style="list-style-type: none"> • Agree with the consultants recommendation of Option C
	<ul style="list-style-type: none"> • Land to the north of Harlow was considered to be the most sensitive compared to south, east or west (Colin Buchanan, 2004, paragraph 10.10.4)
Alternative strategies	<ul style="list-style-type: none"> • Spread development throughout East Herts, to enhance existing settlements and minimise the impact; gradual 'organic' growth to all settlements; development in villages to meet local needs.
	<ul style="list-style-type: none"> • Concentrate development in East Herts towns; concentrate development in larger East Herts towns such as Hertford and Ware
	<ul style="list-style-type: none"> • Ease development restrictions in the villages instead
	<ul style="list-style-type: none"> • Use Hunsdon airfield site
	<ul style="list-style-type: none"> • Develop Great Dunmow/ Braintree instead
	<ul style="list-style-type: none"> • Put the development in and around Stevenage rather than north of Harlow
	<ul style="list-style-type: none"> • Create small self contained sustainable settlements rather than urban sprawl. Create a sense of place
	<ul style="list-style-type: none"> • Use empty homes
	<ul style="list-style-type: none"> • Create a single new town for all 8,500 homes, but not north of Harlow.
	<ul style="list-style-type: none"> • Overall strategy should be to allow modest infilling, even in Green Belt locations; use infill in towns and villages
	<ul style="list-style-type: none"> • Restrict Greenfield development to encourage brownfield redevelopment e.g. Thames Gateway, Edinburgh Way Develop on extensive green spaces within Harlow rather than on the Green Belt; build within Harlow not East Herts villages
	<ul style="list-style-type: none"> • Use open spaces within Harlow for development
	<ul style="list-style-type: none"> • Build upwards (high rise) within Harlow rather than outwards
Support Harlow North	<ul style="list-style-type: none"> • Needed to address unmet housing demand in the region
	<ul style="list-style-type: none"> • That the most sustainable option is to the north has been tested through examination in terms of its planning and sustainability credentials (and endorsed by the High Court)
	<ul style="list-style-type: none"> • Support the principle of urban extensions to Harlow, Stevenage, and Welwyn Garden City, at no more than 4000 each.
	<ul style="list-style-type: none"> • If the district is viewed as a whole, this is probably the least bad option for East Herts to meet its housing need.
	<ul style="list-style-type: none"> • Can help to drive economic recovery
	<ul style="list-style-type: none"> • Support the principle of growth to the north of Harlow, but suggest the final distribution be decided following input from Harlow and Epping Forest District Councils. Should be a separate policy area.
	<ul style="list-style-type: none"> • Harlow North is the most appropriate strategy when considered against the reasonable alternatives; preferable to incremental growth elsewhere which would impact existing (historic) towns and villages.
	<ul style="list-style-type: none"> • There are very few physical and environmental constraints to development
	<ul style="list-style-type: none"> • Transport modelling suggests that a northern spine road and new motorway junction on the M11 would not be strictly necessary to support the traffic needs of North Harlow
	<ul style="list-style-type: none"> • Few on-site residents, compared with other potential growth areas in the district
	<ul style="list-style-type: none"> • Economies of scale from a large development: e.g. decentralised energy, water collection and treatment, reducing need for external travel, provision of full mix of housing stock
	<ul style="list-style-type: none"> • Masterplanning and design can minimise impacts on villages, biodiversity impact, and historic character in the area of the development; or even enhance them.

Q43 - Summary	Q43 - Detailed Comments
	<ul style="list-style-type: none"> Based on an evaluation of the strategic objectives, North Harlow is the appropriate locations to accommodate district's housing needs to 2031. Would allow employment, and transport to be provided alongside other support services North Harlow has the capacity to meet all of E. Herts housing needs to 2031 North of Harlow could leverage investment to the advantage of E. Herts and Harlow Creation of high-value jobs Will enhance the Stort valley as a focus for the town, rebranding it as a 'green' place
Support development north of Harlow – benefits to East Herts	<ul style="list-style-type: none"> Preferably to development other towns and villages, which are over developed. Infrastructure is overloaded in towns and villages. Existing towns and villages cannot cope. Abolition of RSS targets means that North Harlow can make a significant contribution to E. herts housing needs. Easier to deliver 600 new homes p.a. on a single site rather than scattered across the district in a collection of small sites. Greater certainty than numerous small developments Support north Harlow – resources and infrastructure can be concentrated using new methods for building, heating etc rather than being scattered throughout the area. Support – this location should be used regardless of East of England Plan – makes good use of Harlow Mill, and will improve bus service between 3 major towns Development at North Harlow would relieve pressure on existing towns and villages; and prevent piecemeal growth there Support development south of Rodericks Lane, which was mistakenly classified as Greenfield in the Harlow Options Appraisal, but is actually historic landfill (brownfield) Areas north of Harlow in greater proximity to the town and existing employment areas should be considered more favourably than remoter sites. Development strategy should highlight benefits of jobs and housing growth at Harlow for East Herts residents. Can enhance the heritage and environmental quality of the area
Support development north of Harlow – benefits to Harlow	<ul style="list-style-type: none"> Support major strategic growth at Harlow which will transform the town Important sub-regional role of Harlow – London Arc This scale of development is needed in order to achieve transformational change; critical mass, and sustainability features High quality/aspirational housing necessary to attract a broader socio-economic mix to the town
Oppose Development north of Harlow	<ul style="list-style-type: none"> Keep Harlow in Essex Impact on the beautiful countryside/rural area (56) Object to loss of Green Belt Land (59) Quality of life/'breathing space', impact on lifestyles (13) People not profits; developers seek large houses which local people cannot afford; Need low cost rented accommodation, not big detached houses with no regard to infrastructure greed Object to development north of Harlow Even allowing 2000 homes north of Harlow would set a precedent for further long-term expansion ambitions of the developers. Would entail a loss of control of development for generations to come. No natural limits to development before the A120 once the Stort Valley threshold is broken Scale of development is too big Aircraft flightpath – noise. Colin Buchanan study (2004) notes that eastern parts are in the 57dB(A) Leq noise contour. Impact on tranquillity Pylons crossing the site pose cancer risk

Q43 - Summary	Q43 - Detailed Comments
	<ul style="list-style-type: none"> • Not reasonable or sustainable to suggest that all development should go north of Harlow • Unexploded ordnance • Breach of A414/Stort valley • Develop in Harlow rather than the countryside; protect the countryside • Development should help to stabilise and improve existing communities rather than try to introduce large area development which does not encourage communities • New government, new agenda; localism and community wishes; top-down RSS process was undemocratic and lacking in transparency; should be in accordance with locally developed town and parish plans • Harlow North has already been rejected twice, by the Herts Structure Plan and by RPG9. • Development would have serious impact on 16 wildlife sites, 2 scheduled ancient monuments, 6 areas of archaeological significance and a number of historic gardens, especially the Gilston Estate. • Need to reflect future changes in the RSS situation in the Core Strategy. • Despite abolition of RSS, govt is still committed to high house building rates • Object to development in the Green Belt • Will coalesce Harlow and Sawbridgeworth/Bishop's Stortford; will create conurbation joining as far as Hertford and Ware; uncontrolled urban sprawl • 95% of responses to Much Hadham Parish Plan questionnaire object to proposals for any development north of Harlow. • LCA says 'improve and conserve' • Will result in dormitory town • Protect and retain high-quality agricultural land • Impact on the character of the villages. Towns and villages north of Harlow should be treated no differently from other towns and villages of similar size and character in the district; should not be treated as a 'sink' for housing requirement. • Impact on local community • The development would spread existing crime and social problems from Harlow • Inappropriate retail development such as supermarkets • Impact on rural character of East Herts and the quality of life • Too much development already • Need a better not a bigger Harlow • Sustainability Appraisal of the original RSS raised several important doubts about the overall sustainability • No conclusive Appropriate Assessment yet conducted
Oppose development north of Harlow – jobs arguments	<ul style="list-style-type: none"> • There are no local jobs to support such a development. Unrealistic economic aspirations. Will be a commuter town. Jobs before houses. Two major pharmaceutical companies have shut down sites • The recent Harlow Infrastructure Study (March 2010) only identifies potential for 1,900 jobs north of Harlow by 2031. Clearly there would be massive out commuting from development in this location. • RSS was housing-led: no evidence for jobs creation assertions. No evidence to support a policy that Harlow will attract such high tech industries as is suggested.
Oppose development north of Harlow – EiP arguments	<ul style="list-style-type: none"> • Agree with the EiP panel that development north of Harlow would create a separate town; this is exacerbated by the latest proposals from Places for People. I&O paragraph 3.7.8 states that a new settlement will not be considered on the basis that it will not be deliverable within the plan period. This statement also applies to Harlow north, which would to all intents and purpose be a stand-alone settlement. • North Harlow will never integrate with Harlow as the railway and river will always be a barrier to effective linkages between the two. Stort is a natural boundary. • Latest proposals from Places for People is clearly a separate settlement. This reconfiguration is based on a retrenchment of the proposal onto land controlled by

Q43 - Summary	Q43 - Detailed Comments
	<p>the developer, i.e. it reflects what they are now able to deliver. Para 3.7.8 notes that E Herts will not consider a new settlement – this also applies to north Harlow.</p> <ul style="list-style-type: none"> • EiP independent Panel opposed it, following lengthy debate, but was over-ridden by the then Secretary of State without justifying the decision. • E. Herts objected to Harlow north at the EiP; East Herts Council previously opposed expansion to the north. • Agree with the EiP panel that there are strong objections on environmental and landscape grounds; Sustainability Statement prepared by EERA for EiP states that “the CBA study concluded that the location was in the highest category of sensitivity to anything more than 50-100 dwellings and was unlikely to accommodate the particular type of change without extensive degradation of character and value. Mitigation measures are unlikely to be able to address potential landscape/environmental issues” • Area used for rambling, bird-watching, horse riding, cycling, boating and other recreation. STOP Harlow North’s proposals for Gilston Great Park aim to build on this existing use. • Support Gilston Great Park. Harlow Green Infrastructure Plan supports the principles in the Gilston Great Park proposal for ‘actively managed countryside’, which are also complemented by the Stort Waterspace Strategy.
Oppose north of Harlow – infrastructure cannot cope	<ul style="list-style-type: none"> • Increased traffic congestion, e.g. Much Hadham, Sawbridgeworth, Bishop’s Stortford, A414 roundabout • Congestion on trains • No public money to fund the infrastructure, especially since the Comprehensive Spending Review 2010; Learning and Skills Councils (LSC) funding crisis means Harlow College capital programme cannot proceed. • No significant development should occur without firm funding commitments to provide facilities at the same time as, or before, the development occurs • Link road to M11 would be critical • Scott Wilson’s proposals do not address the existing infrastructure deficit • Development would not resolve existing congestion, which is caused by local and terminating traffic • Infrastructure cannot cope; not deliverable • Concerns about sewage capacity; capacity of Rye Meads sewage treatment works; major network upgrades will be needed, as shown by the Rye Meads Water Cycle Strategy. • Schools full; doctors/hospital at capacity • Water supplies cannot sustain a larger population; local water companies are investigating low water pressures in the Hugh Wych area during the summer months which has stopped some homes and businesses having adequate supplies at peak times. • Damage and destruction to wildlife & habitats: e.g. trees, owls, deer, buzzards • Water Framework Directive is a key risk, as Rye Meads WwTW may be required to produce a discharge with a much higher quality in the future than at present, which may even lead to a possible reduction of current maximum volumetric flow consent if the specified chemical and biological quality improvements are not achievable through improved treatment and financial investment. • No gas supply • Concerns about traffic on B1004 through Much Hadham • Development will cause flooding; no building in a floodplain • Possible detrimental effect on Hunsdon Meads SSSI, which could be affected by flooding caused by surface water run-off from the development.
Oppose north of Harlow – disbenefits to Harlow	<ul style="list-style-type: none"> • Will damage the urban form of Harlow; contrary to Gibberd principles. Build to the east first. Stort is a natural boundary between Essex/Harlow and Herts. • Regenerate Harlow first • No regeneration benefits to Harlow – it is a freestanding settlement. Scale of

Q43 - Summary	Q43 - Detailed Comments
	<p>development would undermine regeneration efforts. Target regeneration efforts within the existing town. Developers want to make the development separate from Harlow, probably with a different name – do not care about regeneration; increase housing density with Harlow. Green Belt encourages regeneration of Harlow rather than take the easy Greenfield option which allows obsolescence to remain in the town.</p> <ul style="list-style-type: none"> • No prospect of job creation to match housing growth; could harm employment and regeneration within E. Herts
No need	<ul style="list-style-type: none"> • No justification for all these new homes; reduce the quantum of development; too many homes planned; scale too large; scale is inappropriate to Hertfordshire • No need for East Herts to accommodate London overspill – London plan allows for that. • Question need for so much housing. • Developing North of Harlow will only encourage more people into the area creating a need for more housing; No need for housing due to lack of demand during the recession; Development creates fresh need; Mass immigration creates need; Homes not needed; There is no need for another faceless Church Langley or Thorley Park; a school in Harlow has just closed due to lack of numbers. • No need since Stansted airport second runway now binned; 2nd runway abandoned therefore fewer job opportunities • Will not meet need for affordable housing as well as smaller sites elsewhere in the district
Suggestions for a sustainable development	<ul style="list-style-type: none"> • Should incorporate a truly sustainable drainage system that provides benefits to water quality and improves the environment. • New housing should not be mass produced on ugly estates; no 'brutal' flats; poor quality of residential design on modern developments. • Rivers flowing north-south through the site should be protected by an 8m buffer strip. No development in Stort floodplain. Protect the Stort Valley • Will require appropriate governance arrangements for strategic delivery, e.g. LEP • Any development must be sustainable: including the right infrastructure and the right mix of housing and other land uses. • Any contribution to nationally driven housing targets, such as the growth areas, should no longer form part of the rationale for Harlow growth • Towns and villages should have priority in being allowed to expand in order to meet local need and support existing services; use brownfield sites in existing towns and villages • Do not build on Stort flood plain • Development should not impact the identity of the existing villages e.g. Hunsdon • Planning and sustainability merits have been tested at examination and endorsed by the High Court
Miscellaneous	<ul style="list-style-type: none"> • Questionnaires not delivered • Not enough explanation of the Harlow Options Appraisal is provided. • Must know more about the housing mix and needs of people • Population growth is unsustainable • Vested interests – extensive promotion by HNJV may have trumped planning concerns on RSS policy process. Object to HNJV flyer – misleading. Although residents have repeatedly stated their opposition to the principle of major development in the green fields north of Harlow, HNJV has continued to use such feedback in a frantic attempt to demonstrate community engagement to support their scheme. • Develop north of England and Wales instead of the south • Need a review of the evidence base for development north of Harlow • Question consultants' methodology; lacking in site level detail • Strategic Objectives should be more specific to the spatial context e.g. Theme 1 should refer to towns as the best place to minimise transport emissions. Theme 4

Q43 - Summary	Q43 - Detailed Comments
	should relate design to Gibberd, rather than East Herts
	<ul style="list-style-type: none"> • Para 10.7.5 - Consultants advised that development to the north of Harlow could undermine regeneration benefits – difficult to see how this work could be achieved.
	<ul style="list-style-type: none"> • East of England Plan has been abolished, therefore no development should take place north of Harlow

Comments received to Q43 in respect of other Chapters

Chapter 1: Background and Context

Q43 - Summary Comment	Q43 - Detailed Comment
Sustainability Appraisal	<ul style="list-style-type: none"> The SA has several shortcomings in relation to development north of Harlow: gives no weight to positive cross-boundary impacts at Harlow; fails to recognise that the approach is about the wider housing needs of Hertfordshire, Essex and London; does not give enough weight to social and economic considerations. The SA is superficial.

Chapter 2: Key Issues and Vision

Q43 - Summary Comment	Q43 - Detailed Comment
Theme 1: Energy and Climate Change	<ul style="list-style-type: none"> EEC1 should encourage sustainable location in reducing transport emissions
Theme 3: Housing	<ul style="list-style-type: none"> The need to increase housing supply in relation to wider area, as set out in the SHMA and RSS evidence base, does not appear to have information the objectives. Govt is still committed to high housebuilding rates, despite abolition of RSS. Significant backlog of unmet housing need Overall housebuilding target is far too high – should be accommodated on brownfield land.
Theme 4: Character	<ul style="list-style-type: none"> Fails to assess whether character will best be maintained by a series of Greenfield developments or a single concentrated development – given that there are not enough brownfield sites. 'Green bubble' is inappropriate – a non-planning term. As above, fails to deal with the central policy choice of how to accommodate development on Greenfield sites – through concentration or dispersal
Theme 5: Economy, Skills & Prosperity	<ul style="list-style-type: none"> If, as stated in 2.8.4, numerous existing operators are located in premises no longer suitable for their needs, it is important that they relocate within the local area. As such, the Council needs to consider its strategy for improving and enhancing unsuitable premises in conjunction with providing new premises in locations such as North Harlow, to prevent the loss of employers from the district.

Chapter 3: Development Strategy

Q43 - Summary Comment	Q43 - Detailed Comment
Q22: Development Strategy	<ul style="list-style-type: none"> The evidence base, including SHMA and RSS, points towards need for more not less housing – contradicts paragraph Question sequential approach to Greenfield land use – paragraph 3.5.10
Q23: Distribution Strategy	<ul style="list-style-type: none"> Fails to recognise option to distribute to a single centre

ESSENTIAL REFERENCE PAPER 'Q': MISCELLANEOUS COMMENTS

Q44 - Summary Comment	Q44 - Detailed Comment
Object to housing	<ul style="list-style-type: none"> • No need for so many houses. Question basis on which housing requirement figures have been calculated/housing capacity. Building more houses will not increase affordability. • Inappropriate to suggest a reduction in the planned number of new houses until new evidence is produced. • No more development/develop elsewhere. Do not allow Hertfordshire to go the way of Middlesex. • Expect strong opposition from East Herts Council to any proposal of green belt movement from Stevenage. • Too many large executive dwellings in the villages. More 2-3 bed semis. • Need to prevent an influx of applications between adoption of Core Strategy in 2013 and Zero-carbon 2016.
Role of the Core Strategy	<ul style="list-style-type: none"> • Core Strategy must reflect local wishes • Core Strategy should drive development control. Too many planning applications are considered in isolation, rather than as part of a strategy. After all this consultation, will it be possible to refuse an application because it does not fit in with the Core Strategy that results? • How will the consultation feedback influence the final strategy? • Support sequential approach to brownfield-greenfield development • Need an empty homes strategy • To be a strategy, must be measurable and attainable, otherwise it is not a strategy but a set of aspirations. Parish plans are informative background, but not evidence. • It is wrong that Rural Area policies are virtually indistinguishable from Green Belt policies and the Council should consider how such policies can be re-written to reflect a difference in emphasis and application.
East of England Plan	<ul style="list-style-type: none"> • RSS situation remains fluid – even greater need for sound evidence base. Need to reflect changes to RSS as Core Strategy develops • Not legitimate to consult at this stage when the RSS is to be rescinded. There will be a need to re-consult on Issues and Options.
Question the consultation process	<ul style="list-style-type: none"> • Leaflets not delivered • Leaflets do not include details of distribution • Responding online is not easy and might have deterred people as a result. • Question presentation, content and methodology of the consultation • No-one will vote for the town in which they live to accommodate growth • Why no stakeholder events involving the development industry?
Buntingford	<ul style="list-style-type: none"> • Incorrect to say that there are frequent bus services in Buntingford. This is currently exaggerated in Ch 3. • Dispute assertion that Buntingford is below standard provision of parks, gardens and open spaces • Wildlife sites in Downhall Ley and Porters close are both completely built up and residential
Advice & guidance	<ul style="list-style-type: none"> • Consider the potential benefits of waterways. • Royal Mail has a number of sites in East Herts • Highways Agency is happy to offer assistance in respect of assessing the potential impacts of planned development growth on the strategic road network. • Need to reflect the Lee Valley Regional Park Authority's 'Vision Aims and Principles' document (July 2010). • Needs to be a telecoms policy within the LDF Development Management Policies DPD. See PPG8 for guidance. [Suggested policy wording provided]. • Recommend that the Council consults with aerodrome operators directly. Consider

Q44 - Summary Comment	Q44 - Detailed Comment
	a 'non-official' safeguarding map. Notify local aerodrome operators or any plans for telecom installations, wind turbines, high structures, or minerals venting/flaring nearby
	<ul style="list-style-type: none"> • Need for collaborative working with neighbouring Local Planning Authorities.

ESSENTIAL REFERENCE PAPER 'R': LDF STRATEGIC OBJECTIVES

Theme 1: East Herts Energy and Climate Change

- **ECC1:** To mitigate climate change by reducing carbon dioxide emissions from new and existing development through an integrated approach to sustainable construction, energy efficiency and energy supply, and by encouraging use of low-emission travel alternatives including passenger transport, walking and cycling.
- **ECC2:** To enable communities to adapt to climate change through appropriate design measures, including landscaping, drainage, street layout and building design.

Theme 2: East Herts People and Community Safety

- **PCS1:** To develop safe and secure communities by taking into account the need to reduce opportunities for crime and anti-social behaviour and to reduce the fear of crime across the district
- **PCS2:** To encourage a rich and diverse community life to enhance cohesion and maintain the thriving and vibrant communities in East Herts
- **PCS3:** To encourage increased communication and partnership working between town, parish, district and county councils, and community and voluntary groups, to enable community involvement in the design, development and management of places
- **PCS4:** To ensure that services can withstand pressure from increased population numbers and take measures to maintain a mixed age population, enabling young people to stay in the district and catering for the growing elderly population, to ensure a balanced community
- **PCS5:** To protect existing facilities and provide high quality community based services to serve all levels of dependency, in an effort to reduce social inequalities and disadvantage and to address the needs of all groups in East Herts

Theme 3: Housing East Herts

- **HOU1:** To ensure flexibility of housing through minimum quality, accessibility, space, and private outdoor amenity standards
- **HOU2:** To ensure that the East of England Plan target of at least 600 additional homes per annum are delivered on suitable sites in sustainable locations that provide for a choice of housing types, sizes and tenures
- **HOU3:** To provide sufficient accommodation in sustainable locations for Gypsies & Travellers and Travelling Showpeople on sites which enable successful co-existence with settled communities and offer opportunities for social integration
- **HOU4:** To ensure that the specialist accommodation needs of vulnerable individuals and groups including older people are met

- **HOU5:** To achieve sustainable mixed communities by ensuring the delivery of sufficient affordable housing, either social rented or intermediate housing

Theme 4: East Herts Character

- **CHA1:** The whole rural area of East Herts functions as an important 'green bubble' and its openness should be maintained through the prevention of urban sprawl and inappropriate development and land use through the appropriate management of the Green Belt
- **CHA2:** To accept that all landscapes are influenced by human action and that they have changed and will continue to change over time. Manage this change in a sustainable manner by understanding and applying the key landscape features of each landscape character area to new development in a proactive way that does not destroy the intrinsic value of that unique landscape
- **CHA3:** Ensure that all new development is well designed, reflects its local vernacular context and uses local materials and/or building styles as appropriate to maintain a unique sense of place. By utilising sustainable and innovative approaches to design, new development should also seek to make the most efficient use of land, including land that has been previously developed
- **CHA4:** To preserve and enhance the special historic character of all East Herts' heritage assets

Theme 5: East Herts Economy, Skills and Prosperity

- **ESP1:** To attract investment and balance new housing with the creation of high-value jobs by delivering appropriate business infrastructure and employment sites for a range of business types and needs
- **ESP2:** To support a viable rural economy in the villages and on the land by enabling diversification whilst preserving the special character of the rural area
- **ESP3:** To promote the vitality and viability of the district's town centres by defining a clear and distinctive role for each one, encouraging an appropriate mix of shops, and a high quality urban environment which will appeal to residents and visitors alike
- **ESP4:** To support educational needs by encouraging the provision of new facilities and infrastructure in appropriate locations
- **ESP5:** To encourage visitors to our towns and villages by promoting East Herts and its culture supported by the provision of appropriate tourist facilities

Theme 6: East Herts On the Move

- **OTM1:** To assist in enabling people's travel needs to be met in order that safe access to the services and amenities offered in local towns, villages, the countryside and wider destinations can be achieved by all

- **OTM2:** To locate development where it will minimise the need to travel to key services and facilities such as employment, education, healthcare, retail and recreation
- **OTM3:** To assist in engendering modal shift from private motorised transport to sustainable integrated travel options to help relieve congestion, address car parking issues, reduce the district's carbon footprint and improve the quality of life for all
- **OTM4:** To help facilitate the delivery of passenger transport services that meet the travel needs of residents and employees in the district in a manner which addresses current shortfalls in provision and allows capacity to accommodate future growth
- **OTM5:** To support the retention and enhancement of existing walking and cycling routes and facilities and seek additional safe and attractive provision to make these means of travel more appealing to users and thereby increase modal share
- **OTM6:** To seek to mitigate the negative effects of aviation development and operation

Theme 7: East Herts Health, Wellbeing and Play

- **HWP1:** To maintain and improve existing arts, culture and entertainment facilities and to encourage the provision of new facilities in appropriate locations
- **HWP2:** To support the diversity of faith communities and places of worship by protecting existing facilities and encouraging the provision of new facilities in appropriate locations
- **HWP3:** To protect and support existing community facilities and encourage the provision of accessible new facilities which address the specific needs of the community
- **HWP4:** To support the provision of good quality, accessible, health facilities to meet the needs of the community
- **HWP5:** To support healthy communities by protecting and enhancing existing sport, recreation and open space facilities and providing accessible opportunities for new facilities including encouraging new water-based recreational opportunities in appropriate locations

Theme 8: Green East Herts

- **GRE1:** To protect and enhance the quality of the environment by mitigating the impacts of air, water, land, light, and noise pollution through measures including the sustainable reduction and management of waste and the promotion of recycling
- **GRE2:** To identify and promote networks of green infrastructure as a haven for wildlife as well as a recreational amenity including the protection and management of habitats and areas of biodiversity
- **GRE3:** To protect water supplies and water quality from the impacts of new development

- **GRE4:** To mitigate flood risk by avoiding development in areas at risk of flooding and encouraging sustainable drainage

Theme 9: East Herts Monitoring and Delivery

- **MAD1:** To ensure the timely delivery of infrastructure necessary to support new growth and development
- **MAD2:** To provide a framework for continuous monitoring together with procedures and guidance to enable risk to be managed in the best way, and to provide sufficient flexibility to cope with changing circumstances and uncertainty
- **MAD3:** To deliver sustainable development and ensure that social and environmental benefits are achieved through proper use of developer contributions
- **MAD4:** To produce and keep up to date an effective Local Development Framework based on an analysis of robust evidence to deliver the LDF vision and objectives and achieve sustainable development

EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

EAST HERTS CORE STRATEGY PREFERRED OPTIONS - PROJECT PLAN AND METHODOLOGY STATEMENT

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- To seek agreement to the attached Core Strategy Preferred Options Project Plan and Methodology Statement, which sets out how the Council will reach an initial view on the broad locations for development in the district to 2031;
- To set out the Work Programme for this stage in the project, culminating in public consultation in Spring 2012.

RECOMMENDATION TO EXECUTIVE: to commend to Council that:	
(A)	the East Herts Core Strategy Preferred Options Project Plan and Methodology Statement, together with accompanying Work Programme, contained at Essential Reference Papers 'B' and 'C' to this report, be agreed.

1.0 Background

- 1.1 With the completion of the Issues and Options stage in preparation of the Core Strategy, the Council now turns to the next stage in preparation of the Core Strategy, namely, the Preferred Options.
- 1.2 The Preferred Options stage will be the first time that the District Council sets out for consultation its emerging views on a suitable development strategy for the District to 2031. In other words, the Preferred Options will set out in broad terms, where development should be located, together with a strategy for delivery of that development.

2.0 Report

- 2.1 **Essential Reference Paper 'B'** consists of a Project Plan and Methodology Statement for the Core Strategy Preferred Options. The document explains the steps that the Council needs to take in order to achieve this key milestone.
- 2.2 **Essential Reference Paper 'C'** consists of the Core Strategy Work Programme, showing tasks leading to anticipated consultation on the Preferred Options in spring 2012. ERP 'C' should be read alongside Sections 3 and 4 of the Project Plan.
- 2.3 Section 2 of the document provides an overview of the context for preparation of the Core Strategy Preferred Options. It sets out how the preparation of the Core Strategy Preferred Options will respond to changes in the national policy context (as far as we can be sure at the present time) including proposals relating to the delivery of development. It also explains the role and function of the Core Strategy and also how the Preferred Options stage relates to other stages in preparation of the Core Strategy. Finally, it sets out the justification and rationale for strategic planning at the District level.
- 2.4 Section 3 explains the procedure for selection of the Preferred Option. It explains the basis on which the difficult decisions in respect of the broad development locations will be made. It sets out the various inputs to the decision making process, and explains the procedure by which these inputs will be considered. The aim of this section is to enable stakeholders to see how their views will be considered and understand how the Council will reach its decision.
- 2.5 Section 4 of the document sets out a work programme for preparation of the Preferred Options consultation document, as far as we can be certain at the present time. Given that the detail of the new national planning system remains to be finalised, this may be subject to change.
- 2.6 Finally, section 5 of the document sets out the procedure for handling responses to the Preferred Options consultation.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Essential Reference Papers

‘A’ – Corporate Issues and Consultation

‘B’ – Core Strategy Preferred Options Project Plan and Methodology Statement

‘C’ – Core Strategy Work Programme

Background Papers

None

Contact Member: Councillor M G Carver, Executive Member for Planning Policy and Economic Development

Contact Officer: Kevin Steptoe, Head of Planning and Building Control - Ext 1407

Report Author: Martin Paine, Senior Planning Policy Officer

ESSENTIAL REFERENCE PAPER 'A'

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>Pride in East Herts <i>Improve standards of the built neighbourhood and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
Consultation:	None
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	Failure to progress with the Core Strategy as set out in the Project Plan could lead to a presumption in favour of sustainable development in East Herts, in line with government proposals under the Localism Bill. This would severely limit the ability of local residents and others to shape the future of the district.



**East Herts
Local Development Framework**

Core Strategy Preferred Options

Project Plan and Methodology Statement

July 2011

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Appendices

Appendix A List of Technical Studies/Strategies/Briefs

Appendix B Work Programme

1.0 Summary and Purpose

- 1.1 With the completion of the Issues and Options stage in preparation of the Core Strategy, this document sets out the Council's approach to reaching the next key milestone, namely the Preferred Options stage.
- 1.2 The Preferred Options stage will be the first time that the District Council sets out for consultation its emerging views on a suitable development strategy for the district to 2031. In other words, the Preferred Options will set out in broad terms, where development should be located, together with a strategy for delivery of that development.
- 1.3 Section 2 provides an overview of the context for preparation of the Core Strategy Preferred Options. It sets out how the preparation of the Core Strategy Preferred Options will respond to changes in the national policy context (as far as we can at the present time) including proposals relating to the delivery of development. It explains the role and function of the Core Strategy and also explains how the Preferred Options stage relates to other stages in preparation of the Core Strategy. Finally, it also sets out the justification and rationale for strategic planning at District level.
- 1.4 Section 3 explains the procedure for selection of the Preferred Option. It explains the basis on which the difficult decisions in respect of the broad development locations will be made. It sets out the various inputs to the decision making process, and explains the procedure by which these inputs will be considered. The aim of this section is to enable stakeholders to see how their views will be considered and understand how the Council will reach its decision.
- 1.5 Section 4 of the document sets out a work programme for preparation of the Preferred Options consultation document, as far as we can be certain at the present time. Given that the detail of the new national planning system remains to be finalised, this may be subject to change.
- 1.6 The work programme itself is provided in Appendix B. This will be made available online at www.eastherts.gov.uk/ldf and paper copies can be provided on request from the Planning Policy Team.
- 1.7 Finally, Section 5 of the document sets out the procedure for handling responses to the Preferred Options consultation.

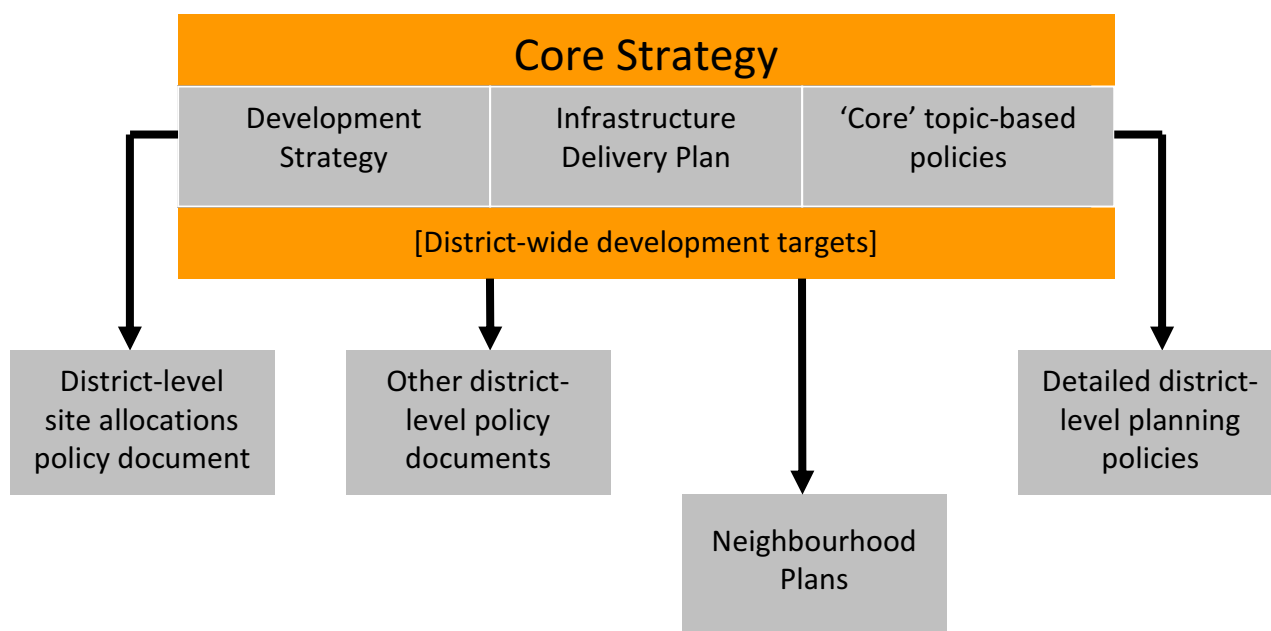
2.0 Core Strategy Preferred Options: Context

2.1 Role and Function of the Core Strategy

2.1.1 The Core Strategy is the first document in the preparation of the Local Development Framework. The Core Strategy has several functions, as shown in Figure 1:

- To set the development strategy (broad locations of growth) for the district;
- To set the overall amount of development for the district over the plan period;
- To provide an infrastructure delivery plan to facilitate effective delivery of the development strategy;
- To set the 'core' planning policies for the district covering topics including housing, economic development, transport, and the environment;
- To embed the principles of sustainable development and good design at the heart of planning policy;
- To provide a context for later District-level policy documents, including site allocations and more detailed planning policies for the determination of planning applications;
- To provide a strategic context for any Neighbourhood Plans which aspire to the status of planning policy through formal adoption by the District Council.

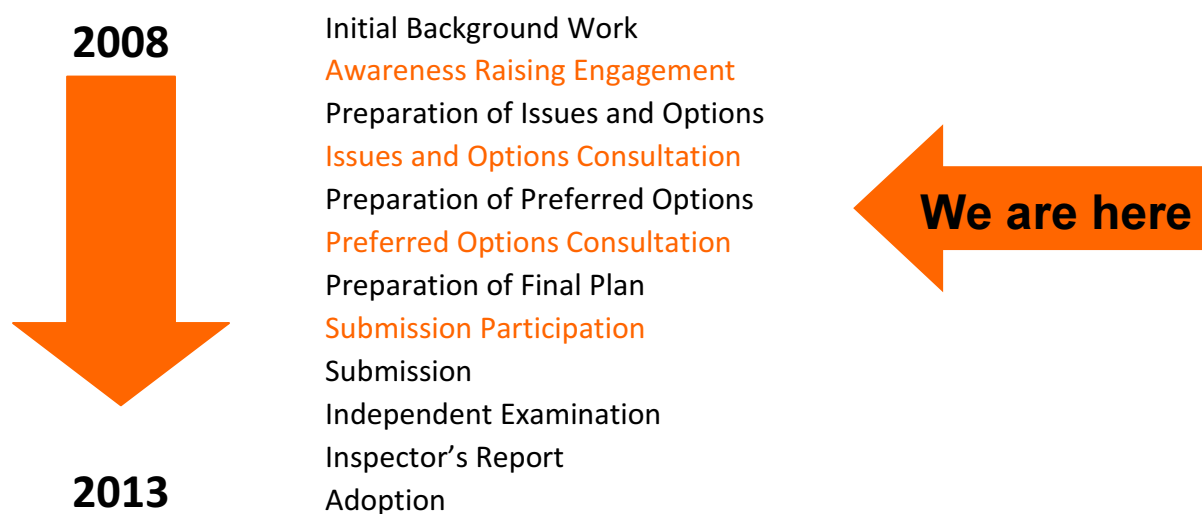
Figure 1: Key functions of the Local Development Framework (LDF) Core Strategy



2.2 Key stages in preparation of the Core Strategy

- 2.2.1 The first stage in preparation of the Core Strategy, known as the Issues and Options stage, was a discussion paper which asked for opinions on any possible development strategy options. Over 3000 responses from individuals and organisations, incorporating 8000 comments were received in response to the Issues and Options consultation in September-November 2010.
- 2.2.2 The second stage in preparation of the Core Strategy is known as the Preferred Options stage, and is the subject of this methodology statement. The Preferred Options stage is the first time that the District Council will set out for consultation its emerging views on the 'difficult decisions' for the development strategy for the district. This is based on the stage one consultation responses and a wide range of other evidence.
- 2.2.3 The third stage is the preparation of the submission version of the Core Strategy. At this stage any significant new information coming forward through the Preferred Options consultation will be assessed and minor changes can be made, or additional information can be used to add support to the delivery strategy.
- 2.2.4 In the event that significant new evidence comes to light during the Preferred Options consultation, the Council may need to re-consult on its Preferred Options before producing its Submission version.
- 2.2.5 The fourth and final stage is in the examination and adoption of the Core Strategy, which is the process by which the strategy becomes planning policy for the district and gains the weight of statute. This constitutes a final 'quality assurance' check on the plan.

Figure 2: Core Strategy Stages of Production (orange text represents stages of production)



2.3 National and Regional Changes to Planning

2.3.1 During the preparation of the Core Strategy the Localism Bill was published, which contained a series of proposed changes to the planning system. Although the Bill has not yet been enacted as an Act of Parliament and there is still the possibility of some late changes, the basic direction of policy as it will impact the preparation of the Core Strategy is clear.

2.3.2 Firstly, Regional Spatial Strategies, including the East of England Plan, are to be abolished. This has several implications for the East Herts Core Strategy:

- housing and other targets currently set by the East of England Plan will need to be replaced by targets set at District level;
- the Core Strategy Preferred Options process can no longer treat north of Harlow separately from other development strategy options, as it did in the Issues and Options Consultation document;
- The separate housing quota established in Policy HA1 of the East of England Plan no longer applies, and therefore if any development is proposed north of Harlow, this would count towards the East Herts district-wide housing requirement;
- the replacement of certain key environmental policies contained within the East of England Plan, for example related to water consumption and climate change, will need to be considered by the Core Strategy.

2.3.3 Secondly, through the Local Development Framework Core Strategy, East Herts District Council is to have responsibility for all strategic planning policy within its boundaries. This is to include setting the amount of development for the plan period, setting the development strategy (the broad locations for development), infrastructure planning, and setting the Community Infrastructure Levy.

2.3.4 Thirdly, a new tier of planning policy is to be introduced below the district level. These 'Neighbourhood Plans' are likely to be at Parish level, and, provided that they are in conformity with the district's Development Plan (of which the Core Strategy is the most important part) and meet various other requirements, the District Council will be under an obligation to adopt them as planning policy. The government has stated that one of the principal objectives of neighbourhood planning is to increase the rate of growth of housing and economic development, and therefore it has announced a number of proposals to ensure that Neighbourhood Plans may not propose less development than that contained within the Local (District) Plan¹

2.3.5 Fourthly, the government has introduced a number of financial incentives in order to promote more development. These include the New Homes Bonus and the

¹ These proposals have been set out in a number of different government publications, including *The Plan for Growth* (HM Treasury, March 2011); *The Local Growth White Paper* (BIS, October 2010), and the *Localism Bill Impact Assessment* (CLG, January 2011). Details are expected within the National Planning Policy Framework, scheduled for consultation during summer 2011.

Community Infrastructure Levy (CIL). The New Homes Bonus will “match fund the additional council tax for each new home and property brought back into use, for each of the 6 years after that home is built with an additional amount for affordable homes” (Grant Shapps, Minister for Housing and Local Government, 12th November 2010).

2.3.6 CIL should help to fund the necessary infrastructure to support communities as they grow. CIL will be levied on all forms of development, with the exception of householder applications. District Councils will be responsible for setting the level of CIL and establishing a ‘charging schedule’.

2.3.7 The CIL regulations (April 2011) are clear that CIL should be integrated with local strategic planning through the Local Development Framework. In recognition of the key supporting role of CIL in delivery of the Core Strategy, East Herts Council intends that CIL will be adopted at the same time as the Core Strategy. An initial consultation on a draft CIL charging schedule will accompany the Preferred Options consultation. This will progress in parallel with the accompanying work on the infrastructure assessment and the Infrastructure Delivery Plan.

2.4 The need for a district-wide strategy

2.4.1 The government has decided that the District level represents the best balance of local accountability and strategic planning. The strategic level of planning will provide the context for the new tier of neighbourhood planning.

2.4.2 There are a number of reasons why a district-wide strategy is needed. It should:

- Provide the statutory basis and hence long-term certainty and confidence for individuals and organisation to make their own plans;
- Enable early planning of infrastructure and service provision to support new development;
- Facilitate work on strategic development issues with adjacent authorities, government partners and delivery agencies;
- Ensure democratic accountability;
- Provide a framework for local strategies and aspirations;
- Ensure that different development sites and types of development work together in the interests of the locality and wider area, rather than in isolation;
- Ensure that wider social, economic, and environmental goals are considered.

2.4.3 One of the most important goals of the Core Strategy is achieved in the process of its production. The process, described in Section 3 below, should demonstrate how the aspirations of a wide range of individuals and organisations may be considered as part of a fair and transparent plan-making process. This is a difficult task, particularly where it requires the Council to decide between conflicting aspirations. In this document, the Council aims to show how its decisions will be informed by a clear and robust decision making process.

3.0 Development Strategy Assessment Process

3.1 Introduction

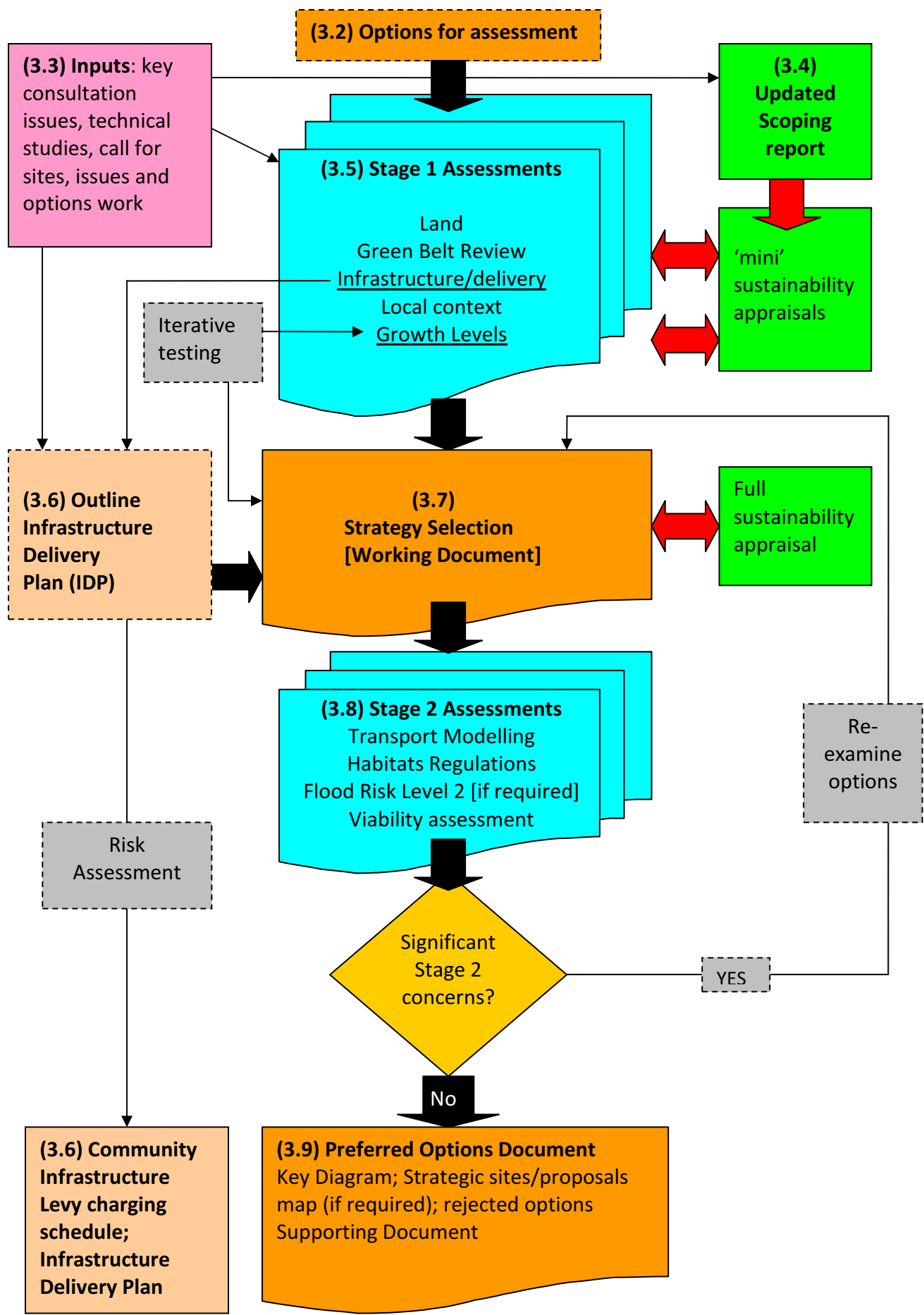
3.1.1 This section explains the procedure for assessment and selection of the preferred development strategy. This section thereby provides the basis for a transparent understanding of the process. It also provides a basis for understanding the Work Programme set out in Section 4.

3.1.2 Figure 3 outlines the assessment process. Each of the numbers in brackets on the diagram corresponds with a sub-section number with Section 3. For further explanation of each step in the progress please refer to the appropriate sub-section below.

3.1.3 Figure 3 may be summarised as follows:

- Inputs (information) are used to update the Scoping Report, which is used to provide baseline information for Sustainability Appraisal of the emerging options, and also to input to the Stage 1 assessments;
- Stage 1 technical assessments are applied to all the initial options. Each of these assessments is then challenged by a 'mini' sustainability appraisal with the aim of improving the breadth and depth of each assessment;
- The Strategy Selection working document will aim to draw together the results of all these separate assessments and provides the first tentative view on appropriate preferred options. The emerging Strategy is then subjected to a full sustainability appraisal with the aim of challenging and improving it;
- Proposed growth levels will be tested against the emerging strategy to see whether they support or undermine it;
- The Stage 1 infrastructure and delivery assessment and any further relevant inputs are used to scope out a draft Infrastructure Delivery Plan (IDP) for consideration alongside the Strategy Selection Report;
- Stage 2 assessments are run against the Preferred Strategy options. If these assessments raise significant concerns, it will be necessary to re-examine the strategy selection report to see whether a) preparation of appropriate mitigation strategies are possible to address the concerns, or failing that b) to look at an alternative development strategy;
- If the Stage 2 assessments do not raise significant concerns then it will be possible to prepare the Preferred Options document for consultation;
- A draft Community infrastructure Levy (CIL) charging scheme and Infrastructure Delivery Plan to support the Preferred Options will also be published for consultation at the same time.

Figure 3: Development Strategy Assessment Process (section references in brackets)



3.2 Options for Assessment

- 3.2.1 As a starting point, the assessment process will examine the options set out in the Issues and Options consultation document². This includes four different types of options: the district-wide development strategy, the district-wide distribution strategy, the settlement-level growth options; and the village strategy. These are set out below.
- 3.2.2 This assessment framework will not preclude any reasonable alternative options which may emerge through subsequent work, nor will it preclude a combination of two or more of the different options from coming forward.
- 3.2.3 Firstly, the assessment will focus on the district-wide strategic options as follows:
- **Option A:** Towns
 - **Option B:** Towns and Larger Service Villages
 - **Option C:** Towns, Larger Service Villages and Smaller Service Villages
 - **Option D:** Towns, Larger Service Villages, Smaller Service Villages, and Other Villages/Hamlets
 - **Option E:** Towns. Stevenage and Welwyn Garden City
 - **Option F:** Settlements within Transport Corridors
- 3.2.4 In the context of Policy HA1 of the East of England Plan, the Issues and Options consultation document set out separate options for urban extensions to Harlow. However, given that there is no longer a requirement to consider Harlow separately, development north of Harlow will be considered as part of Option E, since it shares several characteristics with that option, as an urban extension to a town in a neighbouring district.
- 3.2.5 The Issues and Options consultation specifically discounted the option of a 'new settlement' because of issues about deliverability and the fact that such an option would not have been in conformity with the East of England Plan. There is support for this approach. However, a number of respondents have proposed the creation of a new settlement to meet the district's development needs. In light of the impending revocation of the East of England Plan, it is proposed that further engagement with infrastructure stakeholders is undertaken in respect of this issue to resolve how realistic and feasible such an option is in terms of deliverability.

² Please refer to the Issues and Options consultation document for an explanation of the original options generation process. See for example Chapter 1 and Section 3.7 at <http://consult.eastherts.gov.uk>

3.2.6 Whichever development strategy option we choose, we still need to decide how to distribute the district-wide 'to-find' figure between the identified settlements. The Issues and Options consultation document identified six different distribution strategies:

- **Approach I:** Proportional Distribution
- **Approach II:** Adjusted Proportional Distribution
- **Approach III:** Reversed Proportional Distribution
- **Approach IV:** Equal Distribution
- **Approach V:** Distribution by Land Availability
- **Approach VI:** Distribution by Settlement Type

3.2.7 The development strategy selection process will consider all the settlement-level growth options set out in the Issues and Options document as follows:

- **Bishop's Stortford:** within the existing built-up area; to the northeast; to the east; to the southeast; to the south.
- **Buntingford:** within the existing built-up area; to the south and west; to the north; to the northeast; to the east.
- **Hertford:** within the existing built-up area; to the west; to the north; to the south.
- **Sawbridgeworth:** within the existing built-up area; to the southwest; to the west; to the north.
- **Ware:** within the existing built-up area; to the north; to the east; to the south east; to the south west.

3.2.8 Finally, the Preferred Options Assessment will consider the approach to development in the villages based on three village types (Larger Service Villages, Smaller Service Villages, and other Villages/Hamlets), and the identification of particular villages within each village type.

3.3 Key Inputs to the Assessment process

3.3.1 In brief, the inputs include:

- Technical studies
- Preferred Options Assessments
- Issues arising from the Issues and Options consultation
- Landowner/Developer submissions to the Call for Sites
- Feedback from community events
- Information from ongoing dialogue with key stakeholders
- Sustainability Appraisal/Scoping Report
- The Issues and Options consultation document

Technical Studies

3.3.2 Existing evidence will be updated or supplemented where necessary. A list of technical studies is provided in Appendix A.

3.3.3 A study of an appropriate housing target will need to be completed, following the abolition of the targets set in the Regional Spatial Strategy.

Preferred Options Assessments

3.3.4 The Preferred Options assessments will draw on existing information where this is available and relevant, but will also incorporate new evidence, ranging from field surveys and desk-top research through to information from dialogue with infrastructure and service providers. For more information see Sections 3.5 and 3.8 below.

Consultation issues

3.3.5 Where significant issues relating to the development strategy have been raised through the consultation, these may be considered in one of the following ways:

- Significant issues which do not require further investigation will be considered directly in the Strategy Selection Working Document (see Section 3.7 below). This applies to comments from all sources, including residents, businesses, infrastructure providers, landowners and developers;
- Significant issues which require further investigation and relate to one or more of the assessments will be considered as part of the relevant assessment process;
- Issues which are considered to require further investigation but do not fall within one of the assessments will be programmed as a separate workstream and then considered through the Strategy Selection Working Document.

Landowner/Developer Submissions

- 3.3.6 These submissions³ will be considered through the land assessment discussed in more detail in Section 3.5 below.
- 3.3.7 Any strategically important issues arising from the Call for Sites may also be considered directly by the Interim Preferred Options report, alongside relevant issues arising from the Issues and Options consultation.
- 3.3.8 At this stage there have been no direct meetings with any landowners or developers. However, moving forwards to the submission stage it may be necessary to meet some landowners or developers, depending on any outstanding issues related to delivery of the strategy. Such issues should be identified through consideration of the responses to the Preferred Options consultation.

Feedback from stakeholder events

- 3.3.9 There will be a number of stakeholder events prior to any decisions on the Preferred Options. These may be similar in nature to some of the interactive events held during the preparation of the Issues and Options consultation document.⁴

Key Stakeholder dialogue

- 3.3.10 There will need to be ongoing dialogue with key stakeholders as an initial assessment of the feasibility of the options, particularly in relation to transport and infrastructure concerns. For example, these are likely to include infrastructure and service providers, and statutory bodies such as the Environment Agency.

Sustainability Appraisal

- 3.3.11 The Sustainability Appraisal Scoping Report contains a lot of information relating to a series of topic areas and different spatial areas around the district. It was used as the basis for the Sustainability Appraisal of the Issues and Options document. The Scoping Report may need to be supplemented by any new relevant information.

The Issues and Options Consultation document

- 3.3.12 The document includes information on key issues in each of the five main towns and in the villages and the rural area. Supplemented by issues arising from the comments received in response to the consultation, the document provides a good source of baseline information to inform the decision-making process.

³ Sites were submitted through the Call for Sites exercise. A list of submissions and accompanying site plans are available to view at www.eastherts.gov.uk/callforsites. The information received will be assessed through the Strategic Land Availability Assessment (SLAA). Details of the SLAA are available in the SLAA Project Plan.

⁴ A list of consultation events before and during the Issues and Options consultation event is available on the Council's website at www.eastherts.gov.uk/issuesandoptions

3.4 Sustainability Appraisal

- 3.4.1 Sustainability Appraisal (SA) involves identifying and evaluating the impacts of a plan on the economy, the community, and the environment – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan as well as ways of maximising its positive impacts. SA is a statutory requirement for Core Strategies under the Planning and Compulsory Purchase Act 2004.
- 3.4.2 Scott Wilson Consultants Ltd prepared an SA Scoping Report for the Council in March 2010, which included a key stakeholder consultation period⁵. The Scoping Report sets out the baseline data and framework for the assessment of the strategic options. Using the Scoping report, Scott Wilson conducted a Sustainability Appraisal of the six development strategy options (A-F) and the ‘possible directions of growth’ around the towns.
- 3.4.3 For the appraisal of the Preferred Options process, a full appraisal of the Interim Preferred Options Report will be conducted. The appraisal will be based on the Scott Wilson Scoping Report plus an updated baseline data report consisting of any new information, for example issues raised by the consultees or by the various assessments. The appraisal will incorporate a Strategic Environmental Assessment Assessment (SEA) as required under (European) Directive 2001/42/EC. It will also incorporate a rural proofing assessment, a Health Impact Assessment and an Equalities Impact Assessment.
- 3.4.4 There will be an iterative relationship between the Interim Preferred Options Report and the SA. If the SA identifies significant issues with the Interim Preferred Options, the Interim Preferred Options will be reassessed in the light of the findings of the SA.

‘Mini’ Sustainability Appraisals

- 3.4.5 The emerging findings of the four assessments in terms of the options will then be appraised for their likely wider social, economic and environmental impacts using the sustainability appraisal framework contained in the SA Scoping Report. Any significant findings from this ‘mini-SA’ will be used to adjust the findings within each assessment, and to draw out possible conflicts or areas in need of mitigation.
- 3.4.6 The SA will be conducted in-house by the Planning Policy Team. The Council believes that at the Preferred Options stage a detailed local knowledge of key issues affecting the emerging development strategy is essential to a meaningful appraisal. The Council’s Planning Policy Team, rather than external consultants, are best placed to accomplish this. However, different members of the team have been assigned to work on the Strategy Selection working document and the SA, and therefore the necessary critical distance can be maintained.

⁵ For more details see www.eastherts.gov.uk/corestrategyasa

3.5 Stage 1 Assessments

3.5.1 There will be five initial assessments, each informed by the relevant technical studies:

- Infrastructure assessment
- Land assessments
- Green Belt Review
- Local context assessment (known as the MAPS study)
- Growth levels assessment

3.5.2 Each assessment will draw out any information of relevance to the development strategy options, and make some initial comments on the relative strengths and weaknesses of each option.

Infrastructure Assessment

3.5.7 The Infrastructure Assessment will provide a high-level assessment of the deliverability of the options, and also look at the different infrastructure requirements under each option.

3.5.8 The assessment will be high-level rather than detailed because **a)** information is limited given that East Herts Council is not directly responsible for the delivery of much of the infrastructure required by new development, and **b)** even where East Herts Council has been able to obtain information from providers, certain broad assumptions have had to be made given the early stage in strategy formulation.

3.5.9 It will be possible to go into more detail about infrastructure delivery as more certainty is gained about the emerging Preferred Options. This will be set out in an Infrastructure Delivery Plan (IDP) to accompany the Core Strategy.

Land Assessment (SLAA)

3.5.10 An assessment of land available for development will be carried out based on the information submitted through the Call for Sites. The main objective is to assess the suitability of the land suggested by developers. Far more land was submitted than will be needed in order to accommodate the full housing requirement for the district, and therefore it will be necessary to carefully examine each site against a standard set of assessment criteria.

3.5.11 By integrating the land assessment with the other assessments as part of the preferred option selection methodology, it will also be possible to assess each site against the emerging preferred strategy, which will provide an important additional check on the site-level assessments. This second level of checks will enable the assessment to respond to a wider range of concerns than would be possible by considering each site in isolation.

3.5.12 As with the other assessments, it will be necessary to undertake the land assessment in two distinct iterations: the first, concluding the site-level assessments; and the

second, when further information from the other assessments and therefore the emerging preferred options are understood.

Green Belt Review

- 3.5.13 The Issues and Options consultation highlighted that a Green Belt review would be necessary since there is insufficient brownfield land to accommodate the housing requirement.
- 3.5.14 The Green Belt review will assess all the Green Belt land in the district against the five criteria set down in PPG2. It will also assess where compensatory Green Belt extensions may be made. The study will pay particular attention to the edges of settlements as identified in the development strategy options and possible directions of growth outlined in the Issues and Options consultation.

Local Context assessment (MAPS)

- 3.5.15 The local context assessment will sit alongside the land assessment and the Green Belt review as it will look in detail at land, but from the perspective of the context of the 'grain' of the local built and natural environment. Principally through map-based study it will attempt to describe and explain the character of places and show how that character could be sustained, enhanced, or evolved as necessary.
- 3.5.16 As with the previous two assessments, the local context assessment will be conducted through two iterations. As with the other assessments, the local context assessment will work in two iterations. The first iteration will look at the local context in isolation. The second iteration will look at potential changes to the local context through the adoption of the emerging preferred development strategy.

Growth levels assessment

- 3.5.17 With the anticipated abolition of Regional Spatial Strategies including the East of England Plan, it may shortly be for Local Planning Authorities to decide on how much development is appropriate for the district as a whole as part of their development strategy⁶.
- 3.5.18 Whilst the details of the methodology for deciding the amount of growth have yet to be finalised, part of the process should involve assessing growth levels scenarios against the emerging development strategy, to ensure that the overall growth targets set serve to support rather than undermine the strategy. The emerging growth levels will need to be tested iteratively against the emerging strategy to see what the effects of different growth level scenarios are likely to be.

⁶ Regional Spatial Strategies were first revoked by the Government on 6 July 2010 but were subsequently re-established on 10 November 2010 after a successful challenge by housebuilder CALA homes. Following this, the Government advised that it is for local planning authorities to decide what weight to give to the intention to abolish regional strategies. However, a more recent decision in the High Court (May 2011) has confirmed that the Government's intention to revoke regional strategies may only be worthy of being given weight in very few cases in which the proposed abolition of regional strategies will be relevant. Moreover, the intention to abolish should not be a factor in the plan-making process. Thus, in terms of the East Herts Local Development Framework (LDF), the provisions of the East of England Plan remain in place until the Localism Bill is enacted and a Strategic Environmental Assessment (SEA) of its revocation is completed.

3.6 Infrastructure Delivery Plan

- 3.6.1 One of the key aims of the Core Strategy is to enable early planning of infrastructure and service provision to support new development (see Section 2.4 above). An outline Infrastructure Delivery Plan will be prepared alongside the Strategy Selection Report (see Section 3.7 below), informed by information from the Stage 1 Infrastructure Assessment, technical studies, and ongoing dialogue with key delivery partners.
- 3.6.2 As more certainty emerges about the emerging Preferred Options it will be possible to add more detail to the Infrastructure Delivery Plan. Whilst the initial outline Plan is likely to contain many gaps, it should be possible to fill these in through ongoing research as work progresses.
- 3.6.3 A wide range of agencies from the public and private sectors are responsible for the delivery of essential infrastructure. The IDP has several functions:
- To act as a check on the realism of the emerging Core Strategy;
 - To act as a monitoring tool to ensure that development does not outpace infrastructure delivery, enabling coordinated phasing of the development pipeline;
 - To flag up any critical gaps, for example in knowledge of who will supply the infrastructure, or how it will be funded.
- 3.6.4 If critical gaps remain following work on the Preferred Options and these are not filled in by information from the Preferred Options consultation, it will then be necessary to conduct a risk assessment to judge whether the Infrastructure Delivery Plan is sufficiently robust to enable effective delivery of the Core Strategy.
- 3.6.5 The Infrastructure Delivery Plan will also form the context for the draft Community Infrastructure Levy Charging Schedule (see Section 2.3 above).

3.7 Strategy Selection Working Document

- 3.7.1 This report will draw together the conclusions from each of the five main assessments. It will also draw on any relevant information from the technical studies which have not been incorporated into the updated Scoping Report.
- 3.7.2 The report will assess:
- the development strategy options against the Core (thematic) Policies;
 - whether any 'strategic sites' may be required as allocations within the Core Strategy, and if so, which these might be;
 - the jobs and employment implications of the various options;
 - settlement-specific growth levels, to take forward to the Stage 2 assessments;
 - the key inter-dependencies between the options at various levels.
- 3.7.3 Regarding this last point, the inter-dependencies may be either top-down or bottom up. For example, if certain district-wide strategies are not compatible with effective infrastructure delivery, this top-down consideration may help to structure the response accordingly. If certain settlement-level growth options are not realistic, this may influence the selection of district-wide strategies. The selection process will aim to ensure that the 'big picture' strategy is carefully informed by the relevant detail.
- 3.7.4 The report will be revised following the completion of the Stage 2 assessments to incorporate any relevant findings. If the Stage 2 assessments suggest that there may be serious problems with the Preferred Option, this second iteration of the report will need to address either mitigation measures, or examine another preferred option.
- 3.7.5 Due to its status as a working document which is likely to be subject to frequent revision and amendment throughout the assessment process, the Strategy Selection working document will not be a public document during the process of its development. However, the finalised Strategy Selection Report will be included in the supporting document to the Preferred Options consultation so that consultees may observe the rationale and process of selection for the Preferred Option.

3.8 Stage 2 Assessments

- 3.8.1 As outlined above, the Stage 2 assessments are those which can only reasonably be undertaken once there are some emerging preferred options to assess.

Habitats Regulations Assessment

- 3.8.2 A Habitats Regulations Screening Report of all the development strategy options was undertaken by Scott Wilson Consultants as part of the preparation of the Issues and Options consultation document. This concluded that none of the options could be screened out as having no impact on European Wildlife Sites in the vicinity (Wormley-Hoddesdonpark Woods Special Area of Conservation, Epping Forest SAC, Lee Valley Special Protection Area, Lee Valley Ramsar).
- 3.8.3 The consultants recommended that more detailed research should be undertaken once a preferred strategy starts to emerge. Given the need to comply with the Habitats Directive, in the event that this work identifies substantial likely significant effects on the European Sites, it will be necessary to either identify appropriate mitigation measures or reassess the emerging preferred option.

Flooding Assessment

- 3.8.4 A district-wide flood risk assessment was carried out as part of the evidence base for the LDF⁷. The information in that assessment will be used to inform the land assessment referred to above.
- 3.8.5 In the event that the emerging preferred options include land identified in the district-wide flood risk assessment as 'at risk', it will be necessary to prepare a more detailed flood risk assessment of the broad locations affected under the emerging preferred option. If this study is required, it will be prepared with the close involvement of the Environment Agency.
- 3.8.6 As with the Habitats Regulations assessment, in the event that this detailed flood risk assessment identifies a high flood risk, adequate mitigation solutions will need to be proposed, otherwise it will be necessary to re-examine the options.

Transport Modelling

- 3.8.7 Transport modelling is a quantitative assessment exercise which requires certain assumptions to be made about development options. Where such assumptions cannot be made, for example where there is insufficient information, transport modelling cannot be used. Given the expense and scope of transport modelling, there is a cost-benefit calculation to make in terms of targeting modelling in the most effective way.

⁷ See www.eastherts.gov.uk/sfra

3.8.8 Given these limitations, it is not possible to comprehensively model all the development strategy options. Therefore modelling will be targeted on the emerging Preferred Option as a 'quality assurance' check. In the event that this modelling (together with the habitats regulations assessment and any necessary work on flood risk) uncovers significant negative effects from the emerging preferred option, these will be flagged up and then the emerging option will be reappraised against the original options, together with possible mitigation strategies.

3.8.9 There are three transport models available for use by East Herts Council:

- DIAMOND is an Excel-spreadsheet based model operated by Aecom Consultants but endorsed by Hertfordshire County Council;
- the Harlow-Stansted-Gateway Transportation Board (HSGTB) model will be used to test the option for development north of Harlow together with options along the A1184, including Sawbridgeworth and Bishop's Stortford. The HSGTB model has the advantage of being able to assess the cumulative impacts of other developments in Essex, together with the effect of new roads such as the north Harlow – M11 link road;
- The SATURN model covering Bishop's Stortford may be used in conjunction with any new models to test the impact on development of the Bishop's Stortford North Areas of Special Restraint (ASRs) and other sites in the town.

3.8.10 In carrying out transport modelling, East Herts Council will work closely with Hertfordshire County Council as the highways and transport authority for the District, and with the Highways Agency to consider motorway impacts where necessary.

Viability Assessment

3.8.11 It is important that the emerging Preferred Options should be financially viable. As with the other Stage 2 assessments, if these options are shown to be unviable, then it will be necessary to re-examine the emerging strategy.

3.8.12 The viability assessment will need to be carried out alongside the draft Infrastructure Delivery Plan, taking account of likely costs and funding streams including the Community Infrastructure Levy (CIL).

3.9 Structure and Content of the Preferred Options Document

3.9.1 As noted in Section 1 above, the Preferred Options consultation is the first time the Council will set out for consultation its emerging views on the 'difficult decisions' for the development strategy for the district. In this respect, the Preferred Options Consultation Document is a draft Core Strategy. The Core Strategy is one of several policy documents in the LDF, and is by nature high-level, and should therefore be succinct⁸.

3.9.2 The Preferred Options consultation document will:

- establish the proposed **structure** of the Core Strategy document, and will also strive to attain the same concise nature;
- make it clear **which options have been rejected and why**. A brief explanation will be given in the main document, and further explanation will be given in a supporting document if necessary;
- include a draft **Key Diagram**. The purpose of the Key Diagram is to depict and explain the core components of the development strategy, which is comprised of the broad locations for future development;
- include draft **Core Policies**, which will be based on the themes set out in the Issues and Options document. The document will show how the draft Core Policies will achieve the relevant Strategic Objectives⁹;
- include the key components of the **delivery strategy**, such as infrastructure and employment.

Depending on the nature of the emerging development strategy, the Preferred Options document may:

- include a **proposals map** showing 'strategic sites'. Individual site allocations will be set out in the Site Allocations policy document, once the Core Strategy has been established. However, if certain sites are deemed to be critical to the delivery of the development strategy, these may be allocated through the Core Strategy as 'strategic sites'.

⁸ The Issues and Options consultation document is a discussion document designed to introduce the background and context against which key issues can be evaluated. It is therefore of necessity much longer than a draft Core Strategy.

⁹ The draft Strategic Objectives were set out for consultation in Chapter 2 of the Issues and Options consultation document.

4.0 Work Programme

- 4.1 The Core Strategy Work Programme is shown in Appendix B. This provides the detail to the overall scheme given in Figure 3 (page 10).
- 4.2 It should be noted that given changes to national guidance and other circumstances beyond the control of the Council, the Work Programme should be seen as a guide and may be updated at intervals. Updates will be available online at www.eastherts.gov.uk/ldf or in paper format on request from the Planning Policy Team. The LDF Bulletin will notify registrants of updates to the Work Programme.
- 4.3 The Work Programme shows timelines for forthcoming work on the Preferred Options stage. As yet the Submission Stage (see Section 2.2 above) has not been added to the Work Programme given inherent uncertainties in the policy planning context over the longer duration.
- 4.4 In respect of the Preferred Options stage, this follows on from the Assessment Process outlined in Section 3 (and Figure 3) above.
- 4.5 In brief, the timeline is as follows:
- September 2011 – completion of Stage 1 Assessments
 - November 2011 – completion of Strategy Selection Report
 - January 2012 – Completion of Stage 2 Assessments
 - January 2012 – Completion of Preferred Options Document
 - April 2012 – approval from members for consultation on Preferred Options
 - May-July 2012 – consultation on Preferred Options
- 4.6 It should be noted that there are several ‘critical path’ dependencies within the Work Programme. Therefore, whilst it is possible to conduct some work in parallel, some of the work cannot be commenced until other tasks have been completed. For this reason it is unlikely that the Work Programme will be able to compress the Stage 1 and Stage 2 assessments, for example.

5.0 Handling Consultation Responses

- 5.1 Consultation forms a key part of the democratic policy process. All the issues raised through the consultation process are considered and form a key input to the policy process, as shown in Figure 3 above (see paragraph 3.3).
- 5.2 However, the Government has made it clear that, as part of the Growth agenda, it expects Local Planning Authorities to make rapid progress in getting their plans in place. To this end, a new 'presumption in favour of sustainable development' is to be introduced, which will mean that where a Local Planning Authority does not have an up-to-date plan in place, decisions on planning applications will be based solely upon national policy.¹⁰
- 5.3 East Herts Council has an online consultation portal for LDF consultations (see <http://consult.eastherts.gov.uk>). One of the principal benefits of this system is that it speeds up the handling of consultation responses, since respondents enter their own name, organisation, and comments. In previous consultations, any responses which were not entered directly by respondents using the system were typed up by Council officers. This is a very time-consuming process, and has the potential to cause considerable delay to the policy-making process, particularly for consultations where a large volume of comments are received.
- 5.4 Nevertheless, East Herts Council proposes to continue to give consultees a choice of how to respond to consultations. Although the Council prefers consultees to respond using the online consultation portal, there will be no requirement to use it.
- 5.5 However, anticipating a large volume of responses to the Core Strategy Preferred Options consultation, the following steps will be followed:
1. There will be continued efforts to simplify and improve the user experience of the online consultation portal;
 2. There will be further efforts to promote the portal in preference to other response mechanisms;
 3. Where the Council is aware that groups are intending to coordinate a large campaign in response to a consultation, such groups will be informed of the Council's preference for responses to be made using the portal, and explanation of how to use the portal will be provided;
 4. Comments received from individuals in hard copy format will be made available online in an appropriate format where practicable, or if not practicable, the original documents will be available for viewing at the Council offices;
 5. In the interests of transparency, all submissions from organisations, agencies, businesses, landowners and developers, and Town and Parish Councils, will be

¹⁰ Details of how this will work in practice are anticipated to be clarified by the Government during 2011.

scanned or typed up and made publicly available within the consultation event on the online consultation portal;

6. All responses will be made available for public viewing, either online or in hard copy format, until at least three months after the Core Strategy is adopted;
7. All respondents will be notified of receipt of their comments, preferably by email or, failing that, by post;
8. A list of the name, settlement, and organisation (if applicable) of all respondents will be made available online, either as part of the consultation event within the portal, or separately as a simple list, depending on how the comments were submitted;
9. Issues arising from all comments received will be summarised in the Council's issues report following the consultation;
10. Consultees who wish to receive ongoing updates about the LDF can sign up to receive the LDF Bulletin. Explanation of how to do this will be provided.

- 5.5 It should be re-iterated that all the issues raised will be carefully considered, from whatever source or however they are submitted, and these will be reported in the issues report following the consultation (point 9 above). However, the differing ways in which the comments themselves will be made available for public viewing, depending on the way in which they were submitted, reflects the Council's determination to maintain transparency whilst meeting the Government's requirement to speed up the plan-making process.

Appendix A - List of Technical Studies/Strategies/Briefs

Topic area	Study Title	Date
Bishop's Stortford	Bishop's Stortford Transport Study	2006
	Bishop's Stortford Masterplanning Study	2006
	Mill Site Development Brief	2010
	Goods Yard Development Brief	2011
	Bishop's Stortford and Sawbridgeworth Urban Transport Plan	2011
Energy and Climate Change	Herts Renewable and Low Carbon Study	2010
	Herts Climate Change Scoping Study	2009
Employment and Retail	Employment Land and Policy Review	2008
	Retail and Town Centres Study	2008
Environment	Strategic Flood Risk Assessment	2008
	Habitats Regulations Assessment	2010
	Landscape Character Assessment	2007
	Wildlife Sites Ratification Report	2009
	Hertfordshire Strategic Green Infrastructure Plan	2011
	East Herts Green Infrastructure Plan	2011
Gypsy and Travellers	Accommodation Assessment Stage 1 - Needs	2006
	Accommodation Assessment Stage 2 - Site Scoping	2007
Hertford	Hertford and Ware Urban Transport Plan	2010
	Riverside Yards Development Brief	1998
	Mead Lane Urban Design Framework	2011
Housing	Housing Capacity and Edge of Settlement Study	2007
	Housing Needs Survey/update	2004/5
	Strategic Housing Market Assessment (SHMA)	2008
	SHMA Viability Assessment	2010
Infrastructure and Transport	Herts Infrastructure and Investment Strategy (HIIS)	2010
	Eastern Herts Area Transport Plan	2007
	HIIS Transport Report	2010
	Rye Meads Water Cycle Strategy	2009
	Herts Local Transport Plan 3	2011
	Hertfordshire Inter-Urban Routes Strategy	Forthcoming
Land	Strategic Land Availability Assessment	2011
	Call for Sites	2008
Leisure	PPG17 Audit and Assessment	2005
	Playing Pitch Strategy and Outdoor Sports Audit	2010
North of Harlow	Harlow Options Appraisal	2010
	Harlow Infrastructure Study	2010
Sawbridgeworth	Bishop's Stortford and Sawbridgeworth Urban	Forthcoming

Topic area	Study Title	Date
	Transport Plan	
Stanstead Abbots & St Margarets	St Margarets Farm Development Brief	
Sustainability	Sustainability Appraisal Indicators and Targets	2007
	Sustainability Appraisal	2010
Ware	Hertford and Ware Urban Transport Plan	2010
	Trinity Centre Development Brief	2002

Appendix B: Work programme

[see attached]

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East Herts LDF Core Strategy Preferred Options - Work Programme																						
	2011												2012									
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A		
Handling Consultation Responses																						
Comment Processing																						
Comment Summaries																						
Update SA Scoping																						
Draft addendum																						
Stage 1 Options Assessments																						
Growth levels																						
Infrastructure																						
SLAA																						
Green Belt Review																						
Local Context (MAPS)																						
Strategy Selection Working Document																						
Objectives/Core Policies																						
Options Evaluation and selection																						
Growth levels evaluation																						
Sustainability Appraisal																						
Re-evaluation [if necessary]																						
Stage 2 Options Assessments																						
Transport Modelling																						
Habitats Regulations Assessment																						
Level 2 SFRA [If required]																						
Viability																						
Preferred Options Document																						
Draft document																						
Supporting document																						
Democratic Process																						
Public Consultation - Preferred Options																						
CIL - Preliminary Draft Charging Schedule																						
Preparatory work																						
Democratic Process																						
Public consultation																						
Key																						
Task																						
Officer work																						
Democratic/committee process																						
Public consultation																						

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EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

THE NEW HOMES BONUS AND THE COMMUNITY INFRASTRUCTURE LEVY (CIL)

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- To allow Members to consider the implications of the New Homes Bonus and Community Infrastructure Levy (CIL), which are being introduced as an incentive to new development, and to consider and endorse a suitable approach towards the introduction of these new revenue streams.

<u>RECOMMENDATIONS TO EXECUTIVE: to commend to Council that:</u>	
(A)	a preliminary Draft Community Infrastructure Levy Charging Schedule to be published for consultation alongside the Core Strategy Preferred Options; and
(B)	the importance be acknowledged of the New Homes Bonus and Community Infrastructure Levy, in assisting the delivery of the infrastructure required by the Local Development Framework Core Strategy.

1.0 Introduction – the New Homes Bonus and Community Infrastructure Levy (CIL)

- 1.1 The Government has introduced two financial mechanisms closely related to the planning system, which have significant wider implications for local government: namely, the New Homes Bonus and the Community Infrastructure Levy (CIL).
- 1.2 On 17 February 2011 CLG issued letters to Local Authority Leaders, Chief Executives, and English MPs, which detailed the

provisional **New Homes Bonus** allocations to each local authority and summarised the scheme as follows:

The New Homes Bonus is designed to address the disincentive within the local government finance system for local areas to welcome growth. Until now, increased housing in communities has meant increased strain on public services and reduced amenities. The New Homes Bonus will remove this disincentive by providing local authorities with the means to mitigate the strain the increased population causes. In addition, in doing so the New Homes Bonus should help engender a more positive attitude to growth, and create an environment in which new housing is more readily accepted.

The New Homes Bonus scheme will be a powerful, simple and transparent incentive. Commencing in April 2011, the Bonus will match fund the additional council tax potential from increases in effective housing stock, with an additional amount for affordable homes, for the following 6 years. For the first time, it will ensure that the natural economic benefits of growth are returned to the local authorities and communities where growth takes place.

The New Homes Bonus sits alongside the existing planning system. Local planning authorities will continue to be bound by their obligations under planning law and, in particular, the new Homes Bonus is not intended to encourage housing development which would otherwise be inappropriate in planning terms.

- 1.3 Although the new Homes Bonus is not ring-fenced, the intention is that it should be used locally where new housing is accepted. Announcing finance for the scheme in November 2010¹, Housing Minister Grant Shapps said:

"For too long communities have fought against development because they can't see how it does anything to improve their lives. I'm determined to change this. The New Homes Bonus will ensure that those communities that go for growth reap the benefits of development, not just the costs.

"Councillors will now be able to lead a mature debate about the benefits of development. And rather than being punished for not meeting targets, local communities will now have a reason to say yes to new homes, because they will benefit from better local

¹ CLG Press Release, 12th November 2010. See www.communities.gov.uk/news/newsroom/1768252

services, or perhaps the redevelopment of their town centre in return for backing new housing."

- 1.4 On 4 April 2011², Grant Shapps confirmed the New Homes Bonus allocations and said:

"The system where Whitehall told communities what homes they need to build never worked. Housebuilding declined for years, eventually slumping to its lowest peacetime level since 1924. The construction industry suffered terribly, and in many areas plans for new homes created a bitter legacy of divided communities and animosity towards developers."

"This country needs more homes, so we need the nation to start building again - but this time with the backing of local communities rather than in the teeth of their opposition. That's why we're giving communities a reason to say yes to new homes through these powerful cash incentives."

"But this funding from Government is only the start of the process - it is now essential that councils engage with their local community to decide how the money is spent, so residents feel the direct benefits of growth, rather than extra pressure on local services."

- 1.5 Regulations governing the **Community Infrastructure Levy (CIL)** came into force under the previous government in April 2010. It allows local authorities to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes transport schemes, flood defences, schools, hospitals and other health and social care facilities, parks, green spaces and leisure centres. It will not include affordable housing, which will continue to be dealt with as planning obligations, which enable affordable housing contributions to be tailored to the particular circumstances of the site and crucially, enable affordable housing to be delivered on-site.
- 1.6 Whilst the introduction of a CIL by local authorities is not mandatory, the Government has decided that this tariff-based approach provides the best framework to fund new infrastructure to unlock land for growth. The Community Infrastructure Levy is fairer, faster and more certain and transparent than the system of

² <http://www.communities.gov.uk/news/corporate/1879754>

planning obligations which causes delay as a result of lengthy negotiations.

- 1.7 The principal reform introduced by the new Government (which came into force in April 2011) is to align CIL with aspirations for localism. In November 2010, Decentralisation Minister Greg Clark said³:

"Too little of the benefits of development go to local communities, and our ambition is to correct that with a reformed levy under genuine local control. Neighbourhoods will now get a direct cut of the cash paid by developers to councils - to spend how they wish to benefit the community, from parks and schools to roads, playgrounds and cycle paths."

"Our decentralising changes will also benefit developers through a system that is flexible, predictable and transparent while also cutting the red tape and bureaucracy faced by councils."

"Alongside the New Homes Bonus, this is another way to make sure communities benefit from development in their area. It will help change the debate about development from opposition to optimism."

- 1.8 East Herts Council needs to decide whether to introduce a CIL to the District. There are potentially significant benefits from CIL, in terms of increased revenue to fund the infrastructure supporting new development, and also in delivering the localism agenda. However, whilst there should be significant resource savings in terms of reducing the need for lengthy negotiations with developers during the planning application process, a significant amount of up-front policy work will be required in order to establish the levy.
- 1.9 In order to facilitate this decision-making process, this report provides an overview of New Homes Bonus (Section 2) and CIL (Section 3), and sets these in the context of planning policy (Section 4), which will play a critical role in setting the framework for the operation of these new financial mechanisms. Finally, the report suggests next steps for consideration (Section 5).

³ CLG press release, 18th November 2010: See www.communities.gov.uk/news/corporate/176860911

2.0 New Homes Bonus: overview

- 2.1 Following a consultation on the New Homes Bonus in December 2010, CLG announced on 17 February 2011 that it is implementing the scheme without delay.
- 2.2 A 'New Homes Bonus Calculator' containing the provisional allocation for each district was published at the same time. The results for East Herts are shown in **Essential Reference Paper 'B'**. In summary, according to the calculator, in October 2010:
- Total housing stock was 58,274 (392 net additions October 09/10)
 - Stock of empty homes was 587 (64 net additions)
- Therefore the provisional allocations for **East Herts Council** are:
- Year 1 (2011): **£415,263**
 - Total payment over 6 years: **£2,491,578**
- 2.3 The Year 1 allocations were confirmed by CLG on 4th April 2011.
- 2.4 The allocation for Hertfordshire County Council as Upper Tier authority is calculated at £103,816 in Year 1 and £622,894 total payment over six years. This money is in addition to the East Herts Council allocations given above.
- 2.5 There is unconfirmed speculation at Westminster and in the press that the New Homes Bonus may ultimately have to be 'top-sliced' from existing Council grant funding. As yet the Government has neither confirmed nor denied this.
- 2.6 The details of the financial operation of the scheme are set out in the document entitled "New Homes Bonus – Final Scheme Design" (February 2011). Paragraphs 2.7 to 2.16 below contain selected key extracts from this document, shown in italics. The text is national guidance, not East Herts Council policy.

2.7 Key Principles

- **Powerful:** the grant will be payable for the following six years, so the total will rise for at least the first six years. The diagram below shows how the profile will rise as the grant rolls forward.

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
Yr 1	£	£	£	£	£	£	
Yr 2		£	£	£	£	£	£
Yr 3			£	£	£	£	£
Yr 4				£	£	£	£
Yr 5					£	£	£
Yr 6						£	£
Yr 7							£

Those authorities which respond to the incentive and embrace housing growth will reap the benefits.

- **Simple** - for each additional home local authorities will receive six years of grant based on the council tax, ensuring the economic benefits of growth are more visible to the local community.
- **Transparent** - it will be easy for councillors, the community and developers to calculate and to see the early benefits of growth.
- **Predictable** - the scheme is intended to be a permanent feature of local government funding and will therefore continue beyond the six-year cycle. The design features have been kept simple and stable to ensure that expected rewards for growth are delivered.
- **Flexible** - local authorities will be able to decide how to spend the funding in line with local community wishes... The Bonus will be paid through section 31 of the Local Government Act 2003 as an unringfenced grant.

2.8 Unit of reward (Paragraph 7)

We want the economic benefits of housing growth to be more visible to the local community. We have therefore designed the New Homes Bonus around the council tax revenues generated from housing development.

2.9 We will link the level of grant for each additional dwelling to the national average of the council tax band for the following six years to incentivise local authorities to build and bring back into use the types of homes people want and need, in the places that people

want them.

2.10 Affordable Housing Enhancement (Paragraph 10)

It is crucial that there is a good balance of market and affordable housing. We want to incentivise local authorities to provide the right balance of housing to meet the needs of local people. Particularly in bringing forward land for development, granting planning permissions and negotiating section 106 agreements. This will support the commitment made in the Spending Review of almost £4.5bn over a four year period to support affordable housing.

- 2.11** *To ensure that affordable homes are sufficiently prioritised within supply, there will be a simple and transparent enhancement of a flat rate £350 per annum for each additional affordable home. This is about 25 per cent of the current average Band D council tax or 36 per cent of the average Band A council tax, and will be reviewed if council tax rises. Over six years an affordable home would receive an enhancement of £2,100.*

2.12 Traveller Sites (Paragraph 14)

Traveller sites in public ownership also contribute to the supply of affordable homes. Provision of public traveller caravan sites is now included in the Homes and Communities Agency's affordable housing programme. In agreeing Local Investment Planning with local authorities, the Homes and Communities Agency will seek to ensure that provision of appropriate sites forms part of the overall package of housing and regeneration in the area.

2.13 Empty Homes (Paragraph 20)

The New Homes Bonus is designed to increase the supply of effective housing so it follows that local authorities should be rewarded for bringing empty homes back into use. In addition, making use of existing stock can be important in overcoming some local opposition to new housing.

2.14 Tier split (Paragraph 22)

The payment of the New Homes Bonus will be split between tiers outside London, where two tier arrangements apply: 80 per cent to the lower tier (i.e. Districts) and 20 per cent to the upper tier (i.e. Counties), as a starting point for local negotiation.

2.15 Local Flexibility (Paragraph 23)

Local authorities will have flexibility on how to spend the unringfenced grant. Every development is different and will need different services to support it. Local authorities are best placed to

decide how to meet the needs of local neighbourhoods and communities. In many cases this will involve advanced planning with other local service providers to ensure that there is timely delivery of infrastructure for the new development. For example, local authorities can pool funding to deliver infrastructure.

2.16 Basis of Calculation (Paragraph 26)

The basis on which grant to individual authorities is calculated must be fair and equitable and support the objective of the scheme – to increase housing supply. We want to collect data in a way which is simple and minimises additional burdens on local authorities and others, but is robust and sufficiently timely.

2.17 *We will therefore use the Council Tax Base form to calculate increases in effective stock. This has the advantage of bringing together data on additions, demolitions and empty homes in one place and is already used to calculate formula grant. This data is provided by local authorities. Collection of affordable homes data is considered separately below.*

2.18 Timing of grant allocations and payments (Paragraph 29)

The grant has been designed to be stable and predictable. To maximise this we will normally pay the New Homes Bonus alongside the local government finance timetable. This means that provisional allocations will be announced in early December and final allocations in early February. This will allow local authorities to include the grant in their budget setting process in February. We are issuing allocations for year one slightly later than usual in parallel to the publication of this document.

3.0 Community Infrastructure Levy (CIL) – Overview

3.1 It is considered that there are a number of compelling reasons to introduce a CIL charge in East Herts:

- To make a significant financial contribution towards the infrastructure necessary to enable delivery of the LDF Core Strategy;
- Thereby to maximise East Herts' potential New Homes Bonus payments;
- To fill the gap left by the scaling back of Section 106 contributions, scheduled for spring 2014;
- To increase the transparency with which financial contributions are collected and spent.

3.2 There are no identified disadvantages to the adoption of a CIL

charge by East Herts Council, although if the CIL level is set too high it could stifle development. There is also a requirement to comply with the correct procedures, several of which will need to be undertaken by the Planning Policy Team as part of the preparation of the Local Development Framework. However, there are also important corporate implications relating to collection, reporting, and expenditure of CIL revenues.

- 3.3 Should East Herts Council decide to introduce a CIL, as Local Planning Authority, East Herts Council will become both the CIL charging and collecting authority for Community Infrastructure Levy within the District.
- 3.4 Within Hertfordshire, a substantial amount of useful preparatory work has already been undertaken within the context of the Hertfordshire Infrastructure and Planning Partnership (HIPP).
- 3.5 This work is particularly valuable in setting the wider context for CIL in terms of delivery of infrastructure beyond the local level, which is anticipated to require collaboration by the Hertfordshire local authorities together with other infrastructure providers. In particular, the Hertfordshire Infrastructure and Investment Strategy (October 2009) provides a wealth of information related to CIL and infrastructure delivery more generally.
- 3.6 Paragraphs 3.7-3.19 below provide a brief synopsis of the key guidelines contained within the CLG publication “Community Infrastructure Levy: An Overview” (May 2011), and are therefore shown in italics. The text is national guidance, not East Herts Council policy.
- 3.7 ***How will the levy be spent? (Paragraph 9)***
Local authorities are required to spend the levy’s revenue on the infrastructure needed to support the development of their area and they will decide what infrastructure is needed. The levy is intended to focus on the provision of new infrastructure and should not be used to remedy pre-existing deficiencies in infrastructure provision unless those deficiencies will be made more severe by new development. The levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development.
- 3.8 *The Government will require charging authorities to allocate a meaningful proportion of levy revenues raised in each*

neighbourhood back to that neighbourhood. This will ensure that where a neighbourhood bears the brunt of a new development, it receives sufficient money to help it manage those impacts. It complements the introduction of other powerful new incentives for local authorities that will ensure that local areas benefit from development they welcome.

- 3.9 Local authorities will need to work closely with neighbourhoods to decide what infrastructure they require, and balance neighbourhood funding with wider infrastructure funding that supports growth. They will retain the ability to use the levy income to address the cumulative impact on infrastructure that may occur further away from the development.*
- 3.10 Charging authorities will be able to use revenue from the levy to recover the costs of administering the levy, with the regulations permitting them to use up to 5 per cent of their total revenue on administrative expenses to ensure that the overwhelming majority of revenue from the levy is directed towards infrastructure provision.*
- 3.11 *Monitoring and Reporting spending of the Levy (paragraph 19)***
To ensure that the levy is open and transparent, charging authorities must prepare short reports on the levy for the previous financial year which must be placed on their websites by 31 December each year. They may prepare a bespoke report or utilise an existing reporting mechanism, such as the Annual Monitoring Report which reports on their development plan.
- 3.12 These reports will ensure accountability and enable the local community to see what infrastructure is being funded from the levy. Charging authorities must report how much revenue from the levy they received in the last financial year and how much revenue was unspent at the end of the financial year. They must also report total expenditure from the levy in the preceding financial year, with summary details of what infrastructure the levy funded and how much of the levy was ‘spent’ on each item of infrastructure, and how much on administrative expenses.*
- 3.13 *Charging Schedules (Paragraph 22)***
Charging authorities wishing to charge the levy must produce a charging schedule setting out the levy’s rates in their area. Charging schedules will be a new type of document within the folder of documents making up the local authority’s Local Development Framework (LDF).

3.14 Public Consultation (Paragraph 30)

Charging authorities must consult local communities and stakeholders on their proposed rates for the levy in a preliminary draft of the charging schedule.

3.15 The examination of the charging schedule (Paragraph 31)

A charging schedule must be examined in public by an independent person appointed by the charging authority. Any person requesting to be heard before the examiner at the examination, must be heard in public. The format for the levy's examination hearings will be similar to those for development plan documents... (Paragraph 34) To ensure democratic accountability, the charging schedule must be formally approved by a resolution of the full council of the charging authority.

3.16 How will the levy be charged? (Paragraph 39)

The levy must be charged in pounds per square metre on the net additional increase in floorspace of any given development. This will ensure that charging the levy does not discourage the redevelopment of sites... (Paragraph 40) Any new build – that is a new building or an extension – is only liable to pay the levy if it has 100 square metres, or more, of gross internal floorspace or involves the creation of additional dwellings even when that is below 100 square metres.

3.17 The relationship between the Community Infrastructure Levy and Planning Obligations (Paragraph 57). *The levy is intended to provide infrastructure to support the development of an area rather than to make individual planning applications acceptable in planning terms. As a result, there may still be some site specific impact mitigation requirements without which a development should not be granted planning permission. Some of these needs may be provided for through the levy but others may not, particularly if they are very local in their impact. Therefore, the Government considers there is still a legitimate role for development specific planning obligations to enable a local planning authority to be confident that the specific consequences of development can be mitigated.*

3.18 Ensuring the local use of the levy and planning obligations does not overlap (Paragraph 62). *On the local adoption of the levy, the regulations restrict the local use of planning obligations to ensure that individual developments are not charged for the same items through both planning obligations and the levy. Where a*

charging authority sets out that it intends to fund an item of infrastructure via the levy then that authority cannot seek a planning obligation contribution towards the same item of infrastructure.

- 3.19 *(Paragraph 65) A charging authority may publish, on its website, a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by the levy.. If a charging authority does not publish a list, then this would be taken to mean that the authority was intending to use the monies raised from the levy for any type of infrastructure capable of being funded by the levy, and consequently that authority could not seek a planning obligation contribution towards any such infrastructure.*
- 3.20 *(Paragraph 66) A charging authority can at any time update its published list of infrastructure projects or types of infrastructure. It may consider it expedient to update its list as its infrastructure priorities change over time. The process of updating the list is separate to the formal process of reviewing its charging schedule. If it wishes to update the list, the charging authority simply needs to amend the published list on its website.*

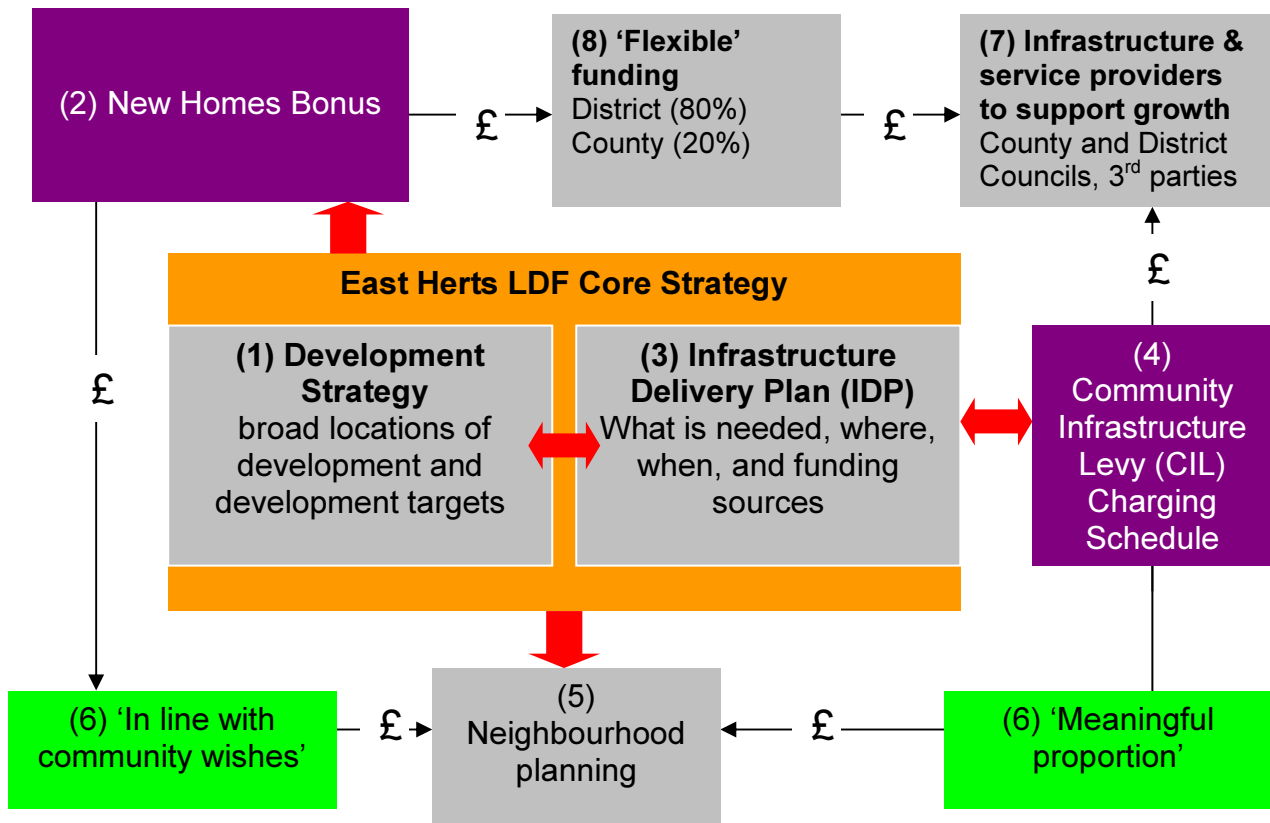
4.0 New Homes Bonus, Community Infrastructure Levy and the LDF Core Strategy

- 4.1 From the above overview of the New Homes Bonus and CIL it will be clear that the Local Development Framework (LDF) has a critical role to play in relation to both schemes. Paragraph 3 of the New Homes Bonus Final Scheme Design states:

The Bonus will sit alongside the existing planning system. It is intended to help deliver the vision and objectives of the community and the spatial strategy for the area. In particular, it will be relevant to the preparation of development plans which concern housing where it assists with issues such as service provision and infrastructure delivery.

- 4.2 Figure 1 below sets out the key relationships as understood by Officers on the basis of the government guidance. At the centre is the Core Strategy, which includes the Development Strategy (Spatial Strategy) and an Infrastructure Delivery Plan.

Figure 1: the role of the East Herts LDF Core Strategy



4.3 Key relationships shown in Figure 1 are as follows:

- The Development Strategy **(1)** is where the number of new homes for the District will be set. This 'housing requirement' is the driver of the total amount of New Homes Bonus **(2)** – See paragraph 4.6 below;
- The Infrastructure Delivery Plan (IDP) **(3)** will set out the infrastructure that is needed to support the development strategy. It is a 'reality check' on the Development Strategy – See paragraph 4.5 below;
- The IDP will specify where funding for infrastructure delivery will come from. The IDP will inform the creation of the CIL **(4)** charging schedule, and will rely on CIL for a portion of the funding allocations contained therein;
- Neighbourhood planning **(5)** is a new tier of planning. Government guidance is clear that neighbourhood plans must be in conformity with the District LDF, and cannot suggest less housing than the LDF;
- A proportion of both the New Homes Bonus and CIL are expected to be spent at neighbourhood level **(6)**, in order to enable communities to 'reap the benefits' of growth. Planning will be necessary for neighbourhoods to have coherent

- proposals for the expenditure and monitoring of this money;
- Much of CIL will be allocated to infrastructure and service providers **(7)**, particularly items highlighted by the IDP as necessary to the Core Strategy;
- New Homes Bonus will be allocated to District and County Councils in the ratio 80/20 **(8)**. Some of this funding may be needed for items in the IDP.

4.4 Critically, the Core Strategy will be an essential tool in deciding where the balance of funding should lie, as stated by CLG:

Local authorities will retain the ability to use the levy where it is needed in their area to address the cumulative impact on infrastructure that may occur further away from the development. They will need to balance neighbourhood funding with wider infrastructure funding needed to support growth.⁴

4.5 The Infrastructure Delivery Plan will link CIL revenues and/or elements of New Homes Bonus where appropriate to the delivery of development, alongside other funding sources such as mainstream public funds. This approach will demonstrate how development should be complemented by the timely delivery of appropriate infrastructure and services, to the advantage of the local community.

⁴ CLG Press Release, 18th November 2010: Notes to editors bullet point 9. See www.communities.gov.uk/news/corporate/176860911

- 4.6 Variations in the overall level of new homes specified in the Core Strategy can lead to significant differences in the amount of New Homes Bonus allocated to the Council. The table below has been produced using the New Homes Bonus Calculator to illustrate the effect on East Herts Council as a Lower Tier authority (receiving 80% of the bonus):

	Scenario	Year 1	Over 6 years
1	East Herts Allocations to October 2010 (392 dwellings). Based on New Council Tax registrations	£415,263	£2,491,578
2	NI 154 - net additional dwellings April 2009 to March 2010 (470 dwellings). Based on County monitoring service.	£599,083	£3,594,495
3	Current Local Plan targets (550 dwellings per annum)	£701,054	£4,206,324
4	East of England Plan (2008) targets (660 dwellings per annum)	£841,265	£5,047,581

Figures compiled using the CLG New Homes Bonus Calculator

- 4.7 Hertfordshire County Council will also experience variations in the level of New Homes Bonus depending on the volume of new homes, reflecting the 20% allocation to Upper Tier authorities.

5.0 **Next Steps**

- 5.1 It is anticipated that the East Herts CIL Charging Schedule would be adopted at the same time as the LDF Core Strategy, anticipated in 2013. However, it is considered that it will be necessary to establish the following corporate mechanisms in advance of adoption:

- Mechanisms for monitoring the expenditure of CIL receipts provided to East Herts Council services;
- Mechanisms for disbursement of CIL receipts to third parties, including infrastructure providers;
- Services budgeting for CIL;
- Collection and enforcement mechanisms.

- 5.2 As part of its LDF Work Programme the Planning Policy Team will carry out the following tasks:

- Viability appraisal of CIL levels

- Preparation of and consultation on a) the Infrastructure Delivery Plan and b) a CIL Charging Schedule
- Work on strategic aspects of CIL under the auspices of HIPP (see paragraph 3.4 above).

5.3 Agreement needs to be reached around what constitutes a 'meaningful proportion' of CIL revenues to be devolved to the neighbourhoods (see paragraph 3.7 above). This is a complicated question and will need further consideration within the context of the LDF process.

5.4 Actions relating to New Homes Bonus need early attention, since the scheme is currently in process of being implemented. Such actions include:

- Looking at how new homes should be monitored and reported;
- Looking at how the expenditure of New Homes Bonus should be monitored and reported in accordance with the principle of transparency.

5.5 Even more complicated is how to define what neighbourhood wishes are, and how the New Homes Bonus might be allocated in accordance with these wishes. The New Homes Bonus 'Final Scheme Design' document (Summary, Page 7) sets a challenging framework within which this question should be considered:

Flexibility...local authorities will be able to decide how to spend the funding in line with local community wishes. The Government expects local councillors to work closely with their communities – and in particular the neighbourhoods most affected by housing growth – to understand their priorities for investment and to communicate how the money will be spent and the benefits it will bring. This may relate specifically to the new development or more widely to the local community. For example, they may wish to offer council tax discounts to local residents, support frontline services like bin collections, or improve local facilities like playgrounds and parks. This will enable local councillors to lead a more mature debate with local people about the benefits of growth, not just the costs.

This is a high-level decision for the corporate and political leadership of the Council, but will also require a lot of detailed ongoing work.

5.6 The guidance hints at four major ways for this to take place:

- The Core Strategy will identify the broad locations of growth in

the District, and therefore those neighbourhoods where the New Homes Bonus should be focused;

- “*Local authorities are best placed to decide how to meet the needs of local neighbourhoods and communities*” (NHB Final Scheme Design – see paragraph 2.15 above). This appears to require a strong corporate steer from the District.
- “*In many cases this will involve advanced planning with other local service providers to ensure that there is timely delivery of infrastructure for the new development.*” (ibid) This is a key function of the Core Strategy Infrastructure Delivery Plan.
- Neighbourhood planning is clearly recommended as a way to articulate community wishes.

5.7 At this stage much work remains to be done in order to clarify how this will work in practice.

6.0 Implications/Consultations

6.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper ‘A’**.

Essential Reference Papers

‘A’ – Corporate Issues and Consultation

‘B’ – New Homes Bonus Calculator –Final Allocations

Background Papers

New Homes Bonus: Final Scheme Design (CLG, February 2011)

New Homes Bonus Calculator

www.communities.gov.uk/housing/housingsupply/newhomesbonus

Community Infrastructure Levy: An Overview (CLG, May 2011)

www.communities.gov.uk/planningandbuilding/planningsystem/communityinfrastructurelevy/

Localism Bill: Community Infrastructure Levy

Impact Assessment (CLG, January 2011)

www.communities.gov.uk/publications/localgovernment/localisminfrastructurelevy

Hertfordshire Infrastructure and Investment Strategy (October 2009)

Contact Member: Councillor M G Carver, Executive Member for
Planning Policy and Economic Development

Contact Officer: Kevin Steptoe, Head of Planning and Building
Control - Ext 1407

Report Author: Martin Paine, Senior Planning Policy Officer

ESSENTIAL REFERENCE PAPER 'A'

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>Caring about what's built and where <i>Care for and improve our natural and built environment.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
Consultation:	Heads of Service Corporate Management Team
Legal:	CIL will need to be properly constituted. There may also be legal implications for the monitoring and expenditure of the New Homes Bonus.
Financial:	The costs of setting up and running CIL have been estimated by CLG in their document 'Community Infrastructure Levy: Impact Assessment' at £91,000 set-up costs (to cover examination) and £16,700 on-going costs. However, up 5% of CIL revenues may be used for running costs. The revenue implications of CIL are difficult to quantify at this stage.
Human Resource:	Relevant Officers from planning and other departments as necessary will need to commit sufficient time in order to set up the appropriate monitoring and management arrangements.
Risk Management:	There will be a need to carefully manage community expectations around how New Homes Bonus and CIL are conditional upon acceptance of new development.

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New Homes Bonus Calculator

[Return to homepage](#)

East Hertfordshire

Current housing stock (Oct 10): 58,274
 Net change in stock (Oct 10)¹: 392
 Stock of empty homes (Oct 10): 587
 Affordability ratio (2010)²: 10.18

Band	A	B	C	D	E	F	G	H	Total
Dwelling stock: (Oct 10)	1%	10%	25%	25%	17%	12%	9%	1%	58,274
Council tax: average national band (2010/11)	£959	£1,119	£1,279	£1,439	£1,759	£2,079	£2,399	£2,878	

Net additions (Oct 09-10):

392									
17	29	166	89	38	21	17	15		392

Empty homes brought back into use⁴:

-1	-45	-10	-18	-5	7	7	1		-64
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Provisional allocations for Year 1:

Lower tier	Upper tier
£415,263	£103,816

Total payment over 6 years:

Lower tier	Upper tier
£2,491,578	£622,894

Please note that the calculator has been updated following the consultation and presents provisional allocations. All revisions to 2009 and 2010 CTB data should be sent to CTB.statistics@communities.gsi.gov.uk. Payments are calculated by subtracting effective stock (total stock less empty homes) in the current year from the previous year to give the net change.

Assumptions:

- Net additional dwellings are calculated by subtracting effective stock (total stock less long-term empty homes) as recorded on the CTB in one year from the previous year. Please see page 21 of the consultation document for further details (<http://www.communities.gov.uk/publications/housing/newhomesbonusconsult>).
- Affordability is measured by the ratio of lower quartile house price to lower quartile earnings (2010).
- Long term empty homes are measured by Lines 12, 14 & 15 of the CTB form (see page 21 of the consultation document). The number brought back into use is calculated by subtracting the stock of empty homes in October 2010 from October 2009 to give the net change. A negative figure represents an increase in the number of empty homes.
- The data have been taken from the Local Authority Council Tax Base 2009 and 2010 Statistical releases. These are based on the council tax base forms submitted by all billing authorities in England. In the case of Welwyn Hatfield and North Warwickshire an interim adjusted figure for empty homes in 2009 have been used. Further data checks will be carried out before any allocations are final. Any revisions to the 2010 CTB statistical release will be made after formal data consultation and quality assurance and they will be officially published.
- The first enhancement payments for affordable homes will be based on 2011/12 data; and paid in Year 2.

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EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL – 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

LOCAL DEVELOPMENT FRAMEWORK: STRATEGIC LAND AVAILABILITY ASSESSMENT (SLAA) PROJECT PLAN AND ESTABLISHMENT OF SLAA PARTNERSHIP

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- The Strategic Land Availability Assessment (SLAA) is ongoing technical work that will inform the East Herts Local Development Framework (LDF). This report seeks endorsement of the SLAA Project Plan and establishment of a formal SLAA Partnership to provide technical advice and guidance to East Herts Council, in respect of land availability and the deliverability of sites.

<u>RECOMMENDATION TO EXECUTIVE: to commend to Council that:</u>	
(A)	the East Herts Strategic Land Availability Assessment Project Plan (July 2011), contained at Essential Reference Paper 'B' to this report , be agreed; and
(B)	a formal SLAA Partnership be established, in order to allow work to commence as soon as possible to inform the next stage of the Core Strategy.

1.0 Background

- 1.1 As part of the preparation of the East Herts Local Development Framework (LDF), Members will recall that East Herts Council is undertaking ongoing technical work in respect of land supply, called a Strategic Land Availability Assessment (SLAA). It is part of the proactive plan-making process that will shape the future of East Herts to 2031, by considering the future needs of the District in terms of the availability of land.

Purpose of the SLAA

- 1.2 Broadly speaking, the SLAA is a survey and assessment of potential sites for development. It provides information from which decisions can be made on how much development to put where and helps reveal the extent to which greenfield and Green Belt land may be needed to meet the district's housing requirement.
- 1.3 The SLAA identifies potential sites for development in the District and gives a technical assessment as to whether they are developable and when they could be developed. The SLAA does not make any decisions as to whether a site should be developed: that is the role of the planning system itself. The main output will be a list or database of sites that could be developed in East Herts from which the Council can select the most sustainable and appropriate sites to be developed through the LDF and planning process.
- 1.4 As such, the SLAA does not automatically rule out sites currently designated as Green Belt. Such sites may however, be ruled out on these grounds during the LDF process.
- 1.5 It should be noted that there is no requirement for East Herts Council to produce a SLAA. There is only a requirement to ensure a continuous supply of housing land by preparing a Strategic Housing Land Availability Assessment or SHLAA. However, acknowledging the wider spatial objectives of the planning system, East Herts Council has opted to prepare a SLAA to look at land supply for all development including employment, retail, leisure and community uses, rather than just prepare a SHLAA in respect of housing.

East Herts Housing Requirement

- 1.6 Members will be aware that on 6 July 2010, the Government revoked regional strategies: the intention being that decisions about planning and housing numbers will rest with local planning authorities.
- 1.7 It should also be noted that this revocation was the subject of a successful High Court challenge by a house builder in November 2010. The Government has, however, signalled its intention to continue the process of abolishing Regional Spatial Strategies (RSS) through the Localism Bill in due course but until this becomes law, the East of England Plan remains part of the statutory Development Plan for the District. Notwithstanding this, it

is for local planning authorities to decide whether the Government's intention to abolish regional strategies forms a material consideration. The Localism Bill will also set out the Governments' changes to the planning system.

- 1.8 Indeed, the Government has indicated that local authorities should continue to demonstrate a continuous five year supply of housing through their SHLAAs. The Government has stated that "local planning authorities will be responsible for establishing the right level of local housing provision in their area, and identifying a long term supply of housing land without the burden of regional housing targets."¹
- 1.9 To date, East Herts Council has not taken a decision as to the appropriate level of housing for the District. The Council consulted on its Core Strategy Issues and Options document between 2 September and 25 November 2010. This document is based on the District wide housing figures set out in the East of England Plan 2008. It should be noted however, that the Review of the East of England Plan, published March 2010, set a lower District-wide housing figure for East Herts.
- 1.10 Thus, irrespective of whatever figure is adopted as the housing target, a SLAA still needs to be undertaken in order to inform both the long-term supply of housing and the wider LDF process.

Relationship to LDF

- 1.11 The SLAA will inform two key Development Plan Documents (DPD) or policy documents in the East Herts LDF: the Core Strategy and Site Allocations. As the overarching strategic policy document which will shape the future of the district to 2031, the Core Strategy is being prepared first. Importantly however, the Core Strategy will not deal with specific sites: it will simply identify broad locations that are suitable for development. The SLAA is crucial, therefore, in demonstrating that there is sufficient capacity within each broad location to deliver the objectives and development requirements in the Core Strategy.
- 1.12 Following preparation of the Core Strategy, the SLAA will then be used to identify which sites should actually be allocated for development in the Site Allocations DPD. Allocating sites for development is an intrinsic part of the plan-making process and enables to Council to effectively manage development and pro-

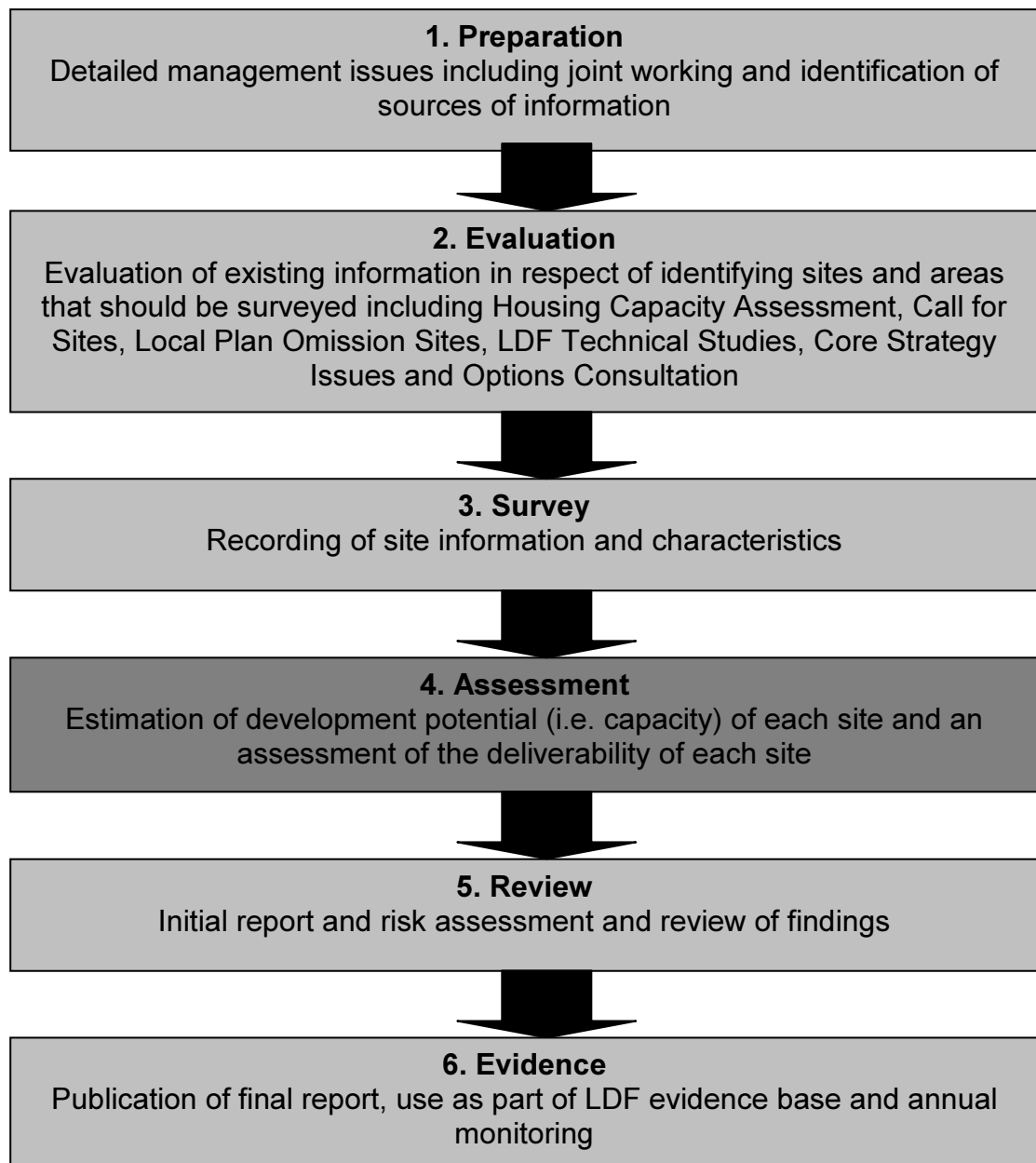
¹ Letter to Chief Planning Officers and Accompanying Frequently Asked Questions (CLG, 6th July 2010)

actively shape how the District will change over the plan period. It gives certainty to both developers and communities in knowing which sites will be developed. It is important to understand however, that there will be a time-lag between the adoption of the Core Strategy and the adoption of the Site Allocations document, during which time the SLAA will be used to provide planning application advice in respect of land availability.

SLAA Methodology

- 1.13 The preparation of the SLAA involves a number of phases reflecting the various stages involved. A SLAA Project Plan has been prepared that sets out the methodology for undertaking the SLAA including a six phase approach as shown in Figure 1. For reference, the SLAA Project Plan is attached as **Essential Reference Paper B**.

Figure 1: The SLAA Phases

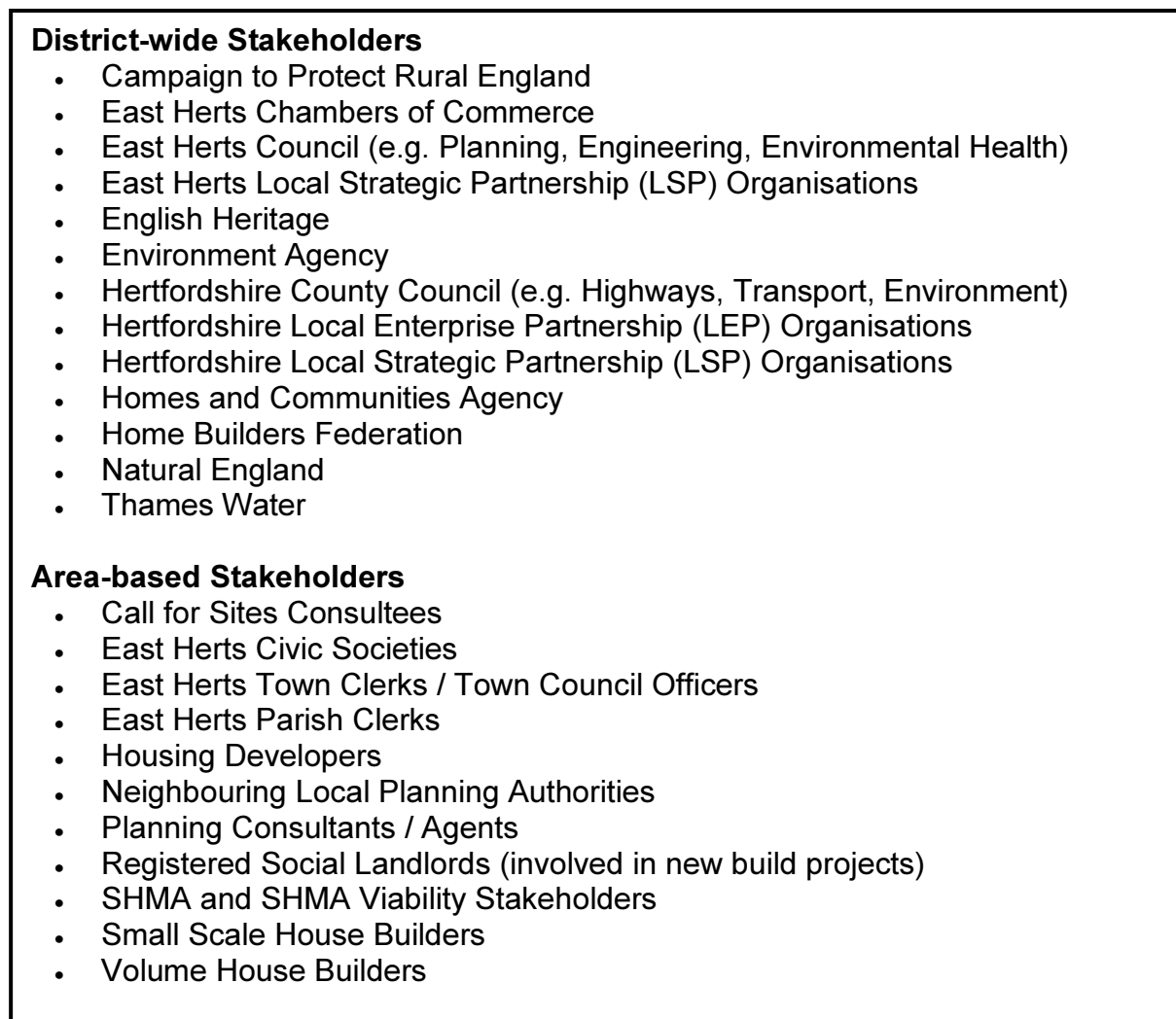


- 1.14 This SLAA has been ongoing for a number of years and much of the work has already been completed, following endorsement of the SLAA through previous LDF Panels, including the Housing Capacity Assessment and Call for Sites. As such, Phase 3 is currently being finalised with preparatory work on Phase 4 beginning.
- 1.15 A key element of Phase 4 is the establishment of a formal SLAA Partnership to assist with the assessment of sites. This report seeks endorsement from Members to establish a formal SLAA Partnership.

2.0 Report

- 2.1 The purpose of the SLAA Partnership is to assist in the preparation of the SLAA technical study by acting as an independent body appointed by East Herts Council to provide advice and opinions on the deliverability and developability of identified sites in an efficient and timely manner, and to add value to the SLAA process through the skills, expertise and knowledge of each of the Partnership's members.
- 2.2 The use of a Partnership is recommended in Government guidance. Failure to engage appropriately with stakeholders could undermine the robustness of the SLAA as a technical study and key piece of the LDF evidence base and subsequently undermine the soundness at examination of the Core Strategy itself.
- 2.3 The Partnership should consist of key stakeholders such as house builders, social landlords, local property agents, local communities and other agencies, where they have a recognised interest in an area (see Figure 2).
- 2.4 Where there are numerous stakeholders (e.g. Parish Councils), a representative may be appointed. Invitations will be sent to a number of agencies although it is recognised that not all of them will be able attend/participate.

Figure 2: List of Key SLAA Stakeholders



2.5 Given the geographic nature of East Herts and the variety of stakeholders involved, it is proposed that that three Sub-groups are established reflecting the three main housing market areas in East Herts (see Figures 3 and 4). The housing markets represent relatively self-contained travel to work areas (excluding London) where on the whole residents live and work, and where they consider moving to when moving home.

Figure 3: SLAA Partnership Structure

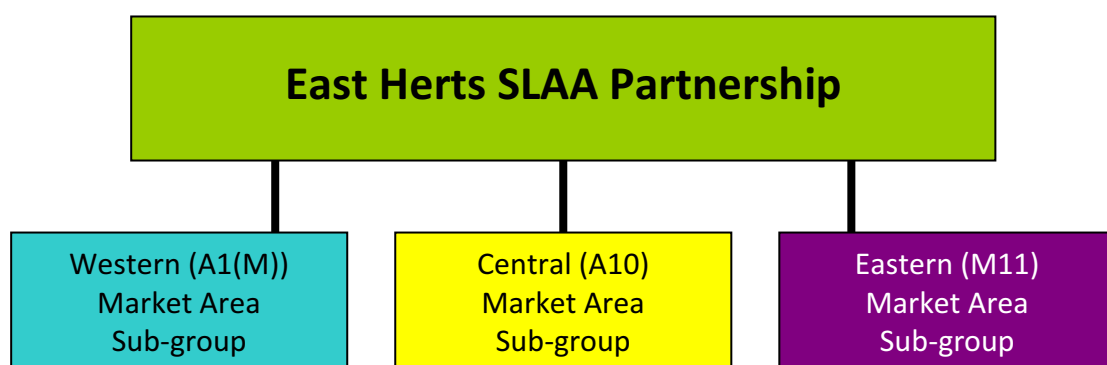
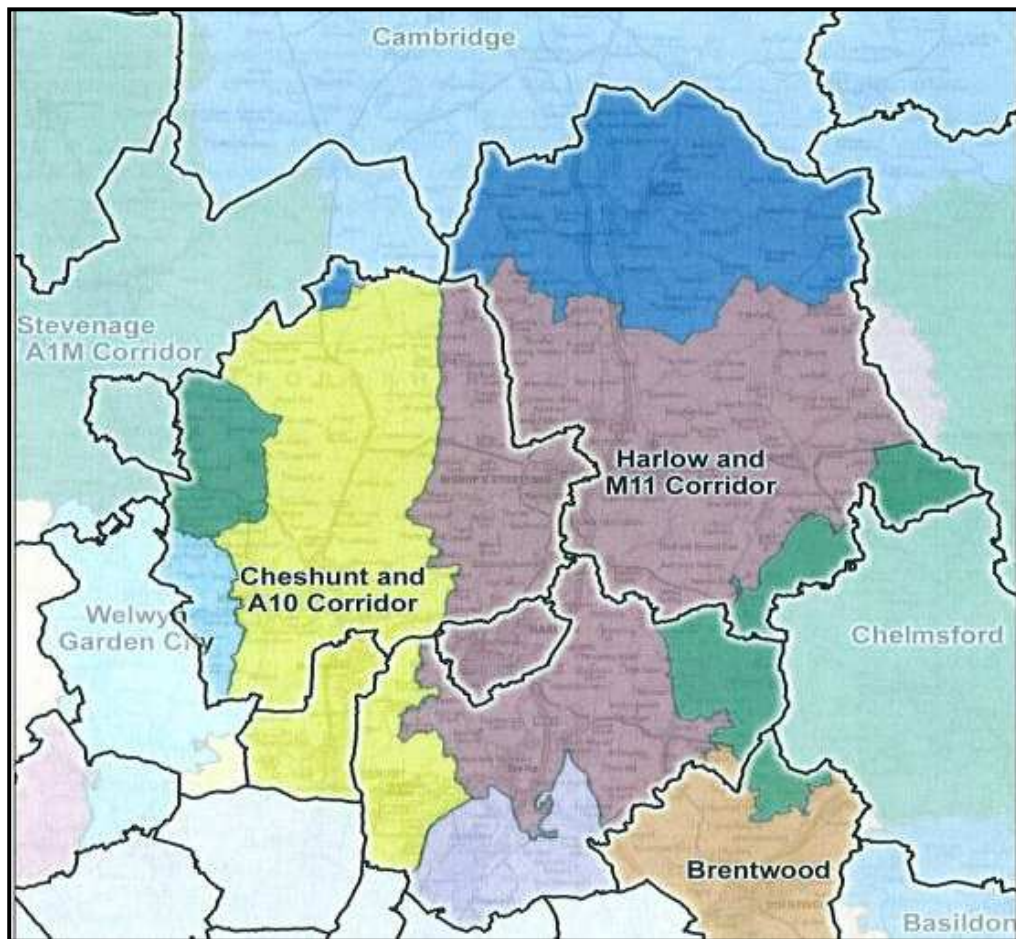


Figure 4: East Herts Housing Markets
(From LCB (East)/M11 SHMA, ORS, 2010)



- 2.6 The benefit of this approach is that not only should it increase levels of engagement with the SLAA process, but that members of the Sub-Groups will have greater expertise of the local property market and area.
- 2.7 The District-wide SLAA Partnership will include representatives of the different stakeholder groups. Its purpose will be to endorse the methodology and assumptions, prior to the assessment process, and then to quality check and risk assess the conclusions of the Sub-Groups. Stakeholders will then be placed into the relevant Sub-Grouping (Western (A1(M)), Central (A10), Eastern (M11)) and it will be these area Sub-Groups that will undertake the actual assessment of sites. As such, certain stakeholders or stakeholder representatives may sit on all three of the Sub-Groups (see Figure 2 above for list of stakeholders).
- 2.8 Due to the technical nature of this work and in order to maintain a clear distinction from the policy-making process, it is proposed

that County, District, and Town and Parish councillors are not invited to sit on the partnership. Councillors will however, be kept informed of progress on the SLAA. For the avoidance of doubt, Figure 5 identifies which parishes will be included within each area Sub-group.

Figure 5: Parishes by Area Sub-group

Western (A1(M)) Market Area Sub-group	Central (A10) Market Area Sub-group		Eastern (M11) Market Area Sub-group
Aston Benington Bramfield Datchworth Hertingfordbury Little Berkhamstead Tewin Walkern Watton-at-Stone	Anstey Ardeley Aspenden Bayford Bengeo Rural Braughing Brickendon Liberty Buckland Buntingford Cottered Great Amwell Great Munden Hormead Little Munden	Hertford Hertford Heath Puckeridge Sacombe Standon Stanstead Abbots Stanstead St Margarets Stapleford Thundridge Ware Wareside Westmill Wyddial	Albury Bishop's Stortford Brent Pelham Eastwick Furneux Pelham Gilston High Wych Hunsdon Little Hadham Meesden Much Hadham Sawbridgeworth Stocking Pelham Thorley Widford

- 2.9 Notwithstanding the above, East Herts Council Members will have the opportunity to endorse the Draft SLAA Report, expected at the next LDF Executive Panel in the Autumn.
- 2.10 The Draft Terms of Reference for the SLAA Partnership are attached as **Essential Reference Paper C** (and is also included as an Appendix to the Project Plan). Members of the SLAA Partnership will be required to sign this agreement prior to commencement of the Partnership.
- 2.11 Interest in the development of one or more potential sites will not preclude membership on the Partnership. However, members of the Partnership will be expected to indicate where potential conflicts of interest might arise with regard to sites that are being considered and shall take no part in the deliberations concerning such sites. This does not preclude providing information as to the deliverability (e.g. suitability, availability and achievability) of a particular site.

- 2.12 Ultimately, the purpose of the Partnership is to provide advice and opinions to the Council on the deliverability and developability of identified sites, and to add value to the SLAA process through the sharing of skills, expertise and knowledge.
- 2.13 The SLAA Partnership is part of the technical SLAA process of assessing whether a site could be developed. It does not make any decisions as to whether a site should be developed.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

- Planning Policy Statement 3: Housing (PPS3), CLG, June 2010
- Strategic Housing Land Availability Assessments Practice Guidance, CLG, July 2007

LDF Executive Panel Reports:

- Local Development Framework Executive Panel 23rd September 2010 - Agenda Item 8: LDF Evidence Base - Technical Studies 2009/10 and 2010/11
<http://www.eastherts.gov.uk/index.jsp?articleid=15160>
- Local Development Framework Executive Panel 27th May 2010 - Agenda Item 7: Call For Sites Update Report
<http://www.eastherts.gov.uk/index.jsp?articleid=13789>
- Local Development Framework Executive Panel 27th August 2009 - Agenda Item 9: LDF Evidence Base - Technical Studies 2008/09 and 2009/10
<http://www.eastherts.gov.uk/index.jsp?articleid=9284>
- Local Development Framework Executive Panel 27th August 2009 - Agenda Item 8: Strategic Land Availability Assessment - Call For Sites Progress Report
<http://www.eastherts.gov.uk/index.jsp?articleid=9284>

Contact Member: Councillor M G Carver, Executive Member for Planning Policy and Economic Development

Contact Officer: Kevin Steptoe, Head of Planning and Building Control - Ext 1407

Report Author: John Careford, Senior Planning Policy Officer

ESSENTIAL REFERENCE PAPER 'A'

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>Pride in East Herts <i>Improve standards of the built environment and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
Consultation:	Engagement with appropriate stakeholders as required.
Legal:	Membership of the SLAA Partnership will require agreement to the SLAA Partnership Terms of Reference.
Financial:	LDF technical work is being funded from the Planning Policy / LDF Upkeep Budgets.
Human Resource:	Existing Planning Policy staff resources will undertake this study.
Risk Management:	In order to be found sound at examination, it is essential that the Core Strategy should be based on a robust evidence base.



Strategic Land Availability Assessment

Project Plan

July 2011

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Appendix A:	List of SLAA Tasks
Appendix B:	SLAA Project Timeline
Appendix C:	List of SLAA Related LDF Executive Panel Reports
Appendix D:	SLAA Partnership Draft Terms of Reference
Appendix E:	SLAA Call for Sites Guidance Note
Appendix F:	SLAA Call for Sites Pro-forma
Appendix G:	SLAA Frequently Asked Questions

1.0 Background and Purpose

Purpose

- 1.1 This Project Plan sets out the Council's approach to preparing its Strategic Land Availability Assessment (SLAA); a piece of ongoing technical research that will inform the East Herts Local Development Framework (LDF) in respect of land supply and assist, as appropriate, in determining planning applications. It is part of the proactive plan-making process that will shape the future of East Herts to 2031, by considering the future needs of the district in terms of the availability of land.
- 1.2 It should be noted that the SLAA identifies potential sites for development in the district and gives a technical assessment as to whether they are developable and when they could be developed. The SLAA does not make any decisions as to whether a site should be developed: that is the role of the planning system itself. The main output will be a list or database of sites that could be developed in East Herts.
- 1.3 Broadly speaking, the SLAA is a survey and assessment of potential sites for development. It provides information from which decisions can be made on how much development to put where and helps reveal the extent to which greenfield and Green Belt land may be needed to meet the district's housing requirement. As such, the site search must be as wide ranging as possible and the Council cannot pick and choose which sites to include. It is expected that the SLAA will identify far more land than required. Thus, the SLAA provides a pool of sites from which the Council can select the most sustainable and appropriate sites to be developed through the LDF and planning process. As such, the SLAA does not automatically rule out sites currently designated as Green Belt. Such sites may however, be ruled out on these grounds during the LDF process.

Relationship to LDF

- 1.4 The SLAA will inform two key Development Plan Documents (DPD) or policy documents in the East Herts LDF: the Core Strategy and Site Allocations. As the overarching strategic policy document which will shape the future of the district to 2031, the Core Strategy is being prepared first. Importantly however, the Core Strategy will not deal with specific sites: it will simply identify broad locations that are suitable for development. The SLAA is crucial, therefore, in demonstrating that there are sufficient sites within each broad location to deliver the objectives and development requirements in the Core Strategy.
- 1.5 Following preparation of the Core Strategy, the SLAA will then be used to identify which sites should actually be allocated for development in the Site Allocations DPD. Allocating sites for development is an intrinsic part of the plan-making process and enables to Council to effectively manage development and pro-actively shape how the district will change over the plan period. It gives certainty to both developers and communities in knowing which sites will be developed. It is important to understand however, that there will be a time-lag between the adoption of the Core Strategy and the adoption of the Site Allocations document, during which time the SLAA will be used to provide planning application advice in respect land availability.

SLAA or SHLAA

- 1.6 There is no requirement for East Herts Council to produce a SLAA. There is only a requirement to ensure a continuous supply of housing land by preparing a Strategic Housing Land Availability Assessment or SHLAA. However, acknowledging the wider spatial objectives of the planning system, East Herts Council has opted to prepare a SLAA to look at land supply for all development including employment, retail, leisure and community uses, rather than just prepare a SHLAA in respect of housing.
- 1.7 Having said that, it is acknowledged that the SLAA will be housing orientated. There are three reasons for this. Firstly, it reflects the actual requirement to prepare a SHLAA and ensure continuous delivery of housing for at least 15 years¹, as required by Planning Policy Statement 3: Housing (PPS3)². Secondly, it recognises that the majority of sites will be for residential development, reflecting the differing need and demand for various land uses. Finally, it appreciates that in many instances employment, retail, leisure and community uses will come forward on sites as part of a housing or housing-led mixed-use scheme.
- 1.8 The SHLAA Practice Guidance³, which sets out a standard methodology for assessing land availability which this Project Plan follows, does also refer to co-ordinating the SHLAA with other evidence gathering exercises such as the employment land review.⁴ The intention, therefore, for non-housing uses is not necessarily to ensure a continuous supply of land but to ensure that there is sufficient land available in suitable locations to meet the needs of East Herts.
- 1.9 In respect of housing, the Government's objective is to ensure that the planning system delivers a flexible, responsive supply of land for housing.⁵ The purpose of the SHLAA (SLAA) is to identify sites in and around settlements with potential for housing; assess their housing potential; and assess when they are likely to be developed. The overall aim of the SHLAA (SLAA) is to:
1. Produce a list of sites, cross referenced to maps showing locations and boundaries of specific sites or broad locations;
 2. Assess the deliverability/developability of each site (suitability; availability; and achievability) to determine when an identified site is realistically expected to be developed;
 3. Estimate the potential quantity of housing a site could accommodate;
 4. Identify the constraints on each site; and,
 5. Recommend on how these constraints could be overcome and when.

SLAA Benefits and 'Windfall Sites'

- 1.10 The rationale for preparing a SLAA comes from the Government acknowledging that a common weakness of former local plans was that they did not address how existing residential areas will change as a consequence of infilling and redevelopment for housing, nor how the consequence of this change for social services, GP

¹ Paragraph 53, Planning Policy Statement 3: Housing (CLG, June 2010)

² Planning Policy Statement 3: Housing (CLG, June 2010)

³ Strategic Housing Land Availability Assessments: Practice Guidance (CLG, 2007)

⁴ Paragraph 19, Strategic Housing Land Availability Assessments: Practice Guidance (CLG, 2007)

⁵ Paragraph 52, Planning Policy Statement 3: Housing (CLG, June 2010)

services, education or transport will be managed. This meant that there was often no planned approach to managing change in such areas. Rather, development control has had to try to cope on a purely responsive basis within overall national policy, often leading to serious delays in the provision of social infrastructure, or failure to make adequate provision for it at all, together with rising public opposition to growth⁶.

- 1.11 These developments that were granted permission on unidentified and therefore unallocated sites are known as ‘windfall sites’. Whilst the East Herts Local Plan 2007 includes an allowance for such sites to come forward (160 dwellings per annum), there was no certainty that this number of dwellings will actually come forward or how many would come forward in a particular location. Given this uncertainty, local planning authorities are no longer able to take a ‘windfall allowance’ into account in the LDF. But this does not matter because the SLAA will identify all sites in advance and should include what would have been known as ‘windfall sites’ (although such sites identified and assessed in a SLAA database are not windfalls, for the very reason that they have been identified).
- 1.12 It is also worth remembering that when a windfall site comes forward and planning permission is granted, it becomes a part of the housing supply and should be added to the SLAA database when it is next updated⁷. Thus, the SLAA is part of the pro-active plan-making process of the LDF inasmuch that because it will identify which areas will witness development it can more effectively plan for those areas.
- 1.13 A further benefit of the SLAA (as opposed to just a SHLAA) is that it will consider the availability of other land use and help ensure that sufficient land is made available to provide employment and leisure uses to support housing development.

East Herts Housing Requirement

- 1.14 It should be noted that the requirement to demonstrate a continuous five-year supply of housing originates from the original PPS3 published in November 2006, which was formulated in the context that Regional Spatial Strategies (RSS) set the district housing target.
- 1.15 On 6th July 2010, the Government revoked regional strategies. However this revocation was the subject of a successful High Court challenge by a house builder in November 2010. The Government has signalled its intention to continue the process of abolishing Regional Spatial Strategies (RSS) through the Localism Bill in due course but until this becomes law, the East of England Plan remains part of the statutory Development Plan for the district. Notwithstanding this, it is for local planning authorities to decide whether the Government’s intention to abolish regional strategies forms a material consideration.
- 1.16 The Localism Bill will also set out the Governments’ changes to the planning system. To date, the Government has indicated that local authorities should continue to demonstrate a continuous five year supply of housing through their SHLAAs. The Government has stated that “local planning authorities will be responsible for establishing the right level of local

⁶ Paragraphs 8 & 9, Strategic Housing Land Availability Assessment and Development Plan Document Preparation (PAS/POS, July 2008)

⁷ Paragraph 56, Strategic Housing Land Availability Assessment and Development Plan Document Preparation (PAS/POS, July 2008)

housing provision in their area, and identifying a long term supply of housing land without the burden of regional housing targets.”⁸

- 1.17 To date, East Herts Council has not taken a decision as to the appropriate level of housing for the district. The Council consulted on its Core Strategy Issues and Options document between 2nd September and 25th November 2010. This document is based on the district wide housing figures set out in the East of England Plan 2008. It should be noted however, that the Review of the East of England Plan, published March 2010, set a lower district-wide housing figure for East Herts. Whatever figure is adopted as its housing target, it should be supported by robust up-to-date evidence.

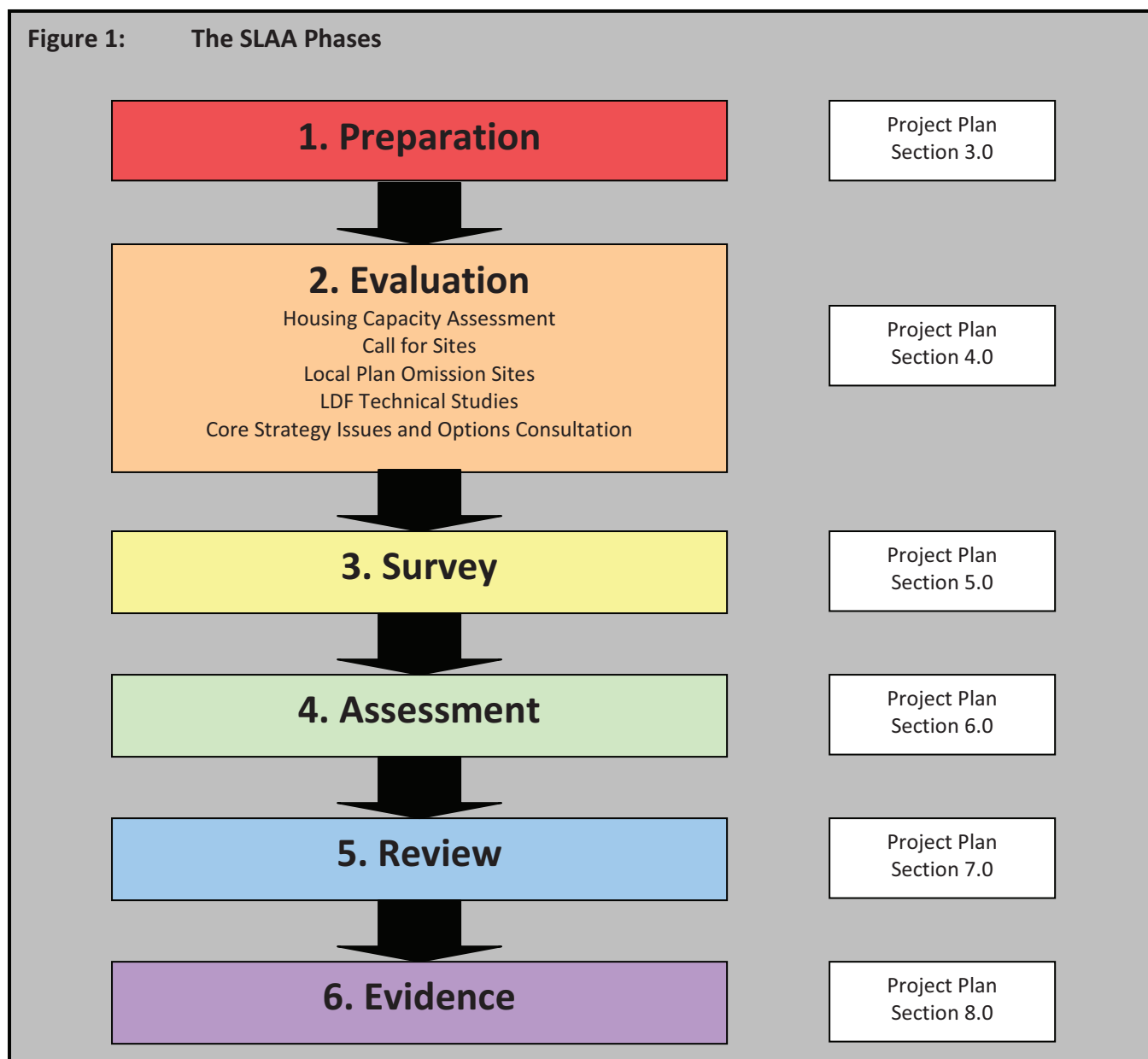
Disclaimer

- 1.18 It is important to remember that the SLAA provides evidence to support decision making, it does not make decisions about which sites should be developed for housing through plan policy. Potential sites for new development which have been identified through the SLAA will be further tested through the plan making process for DPDs, including Sustainability Appraisal, stages of public participation and consultation, and independent examination. The completed SLAA will be an important technical document in the evidence base for the LDF, crucially in respect of demonstrating a continuous five-year supply of housing.

⁸ Letter to Chief Planning Officers and Accompanying Frequently Asked Questions (CLG, 6th July 2010)

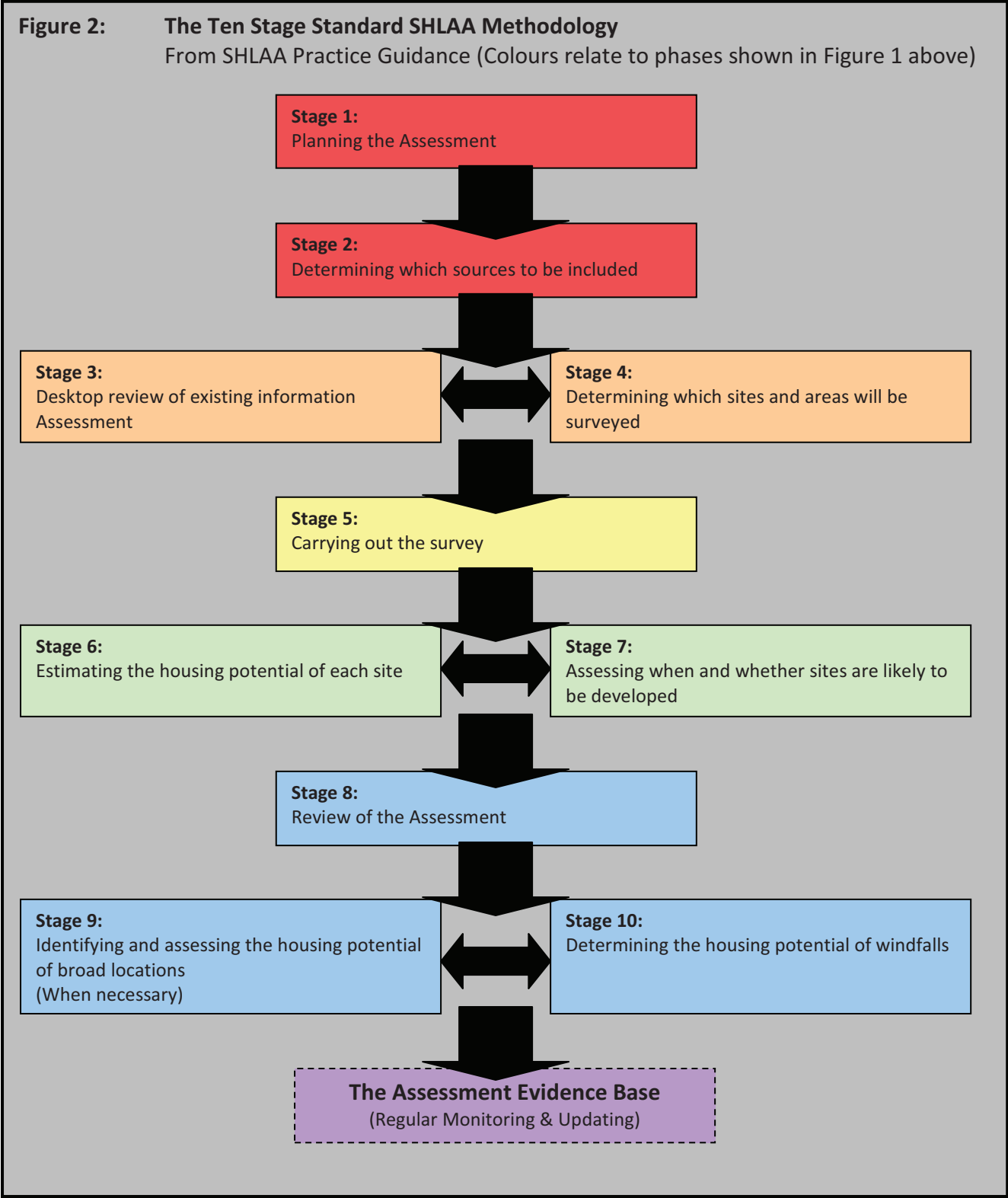
2.0 Methodology

- 2.1 The process for undertaking the SLAA has been divided into six phases. These are shown in Figure 1 and explained in the subsequent sections of this Project Plan. The phases reflect the wider role and purpose of the SLAA and the fact that it is being tied into the preparation of the East Herts LDF.
- 2.2 A Summary of Tasks for each phase is set out at the end of Phases 2 - 6 (Sections 4.0 - 8.0) and in full in Appendix A. For those tasks still outstanding, anticipated dates of completion are also given. These are also shown in the Timeline in Appendix B.



- 2.3 The SLAA is concerned with the availability of *all* land uses, including housing. Because it is a requirement to assess *housing* land availability, the Government has published a standard methodology for doing so. This Project Plan, therefore, reflects that methodology as set out in Strategic Housing Land Availability Assessments: Practice Guidance (July 2007). Use of

this standard methodology is strongly recommended “because it will ensure that the assessment findings are robust and transparently prepared. When followed, a local planning authority should not need to justify the methodology used in preparing its assessment, including at independent examination.”⁹ Figure 2 shows how the standard ten-stage SHLAA methodology relates to the six phases of the SLAA.



⁹ Paragraph 15, Strategic Housing Land Availability Assessments: Practice Guidance (CLG, 2007)

Timeline

- 2.4 Whilst the SLAA is part of the technical evidence to inform the preparation of the East Herts LDF, it is unlike other technical studies in that there are a number of separate phases to the project that have been prepared over a number of years. The timeline for the SLAA, including the various tasks is set out in Appendix B.

Outputs and Monitoring

- 2.5 The main output of the SLAA will be the SLAA database. Using Hertfordshire County Council's CDP monitoring system, the database will include a list of sites, site information such as address, characteristics and constraints, an estimation of development potential, an assessment of deliverability, and recommendations on how any identified constraints could be overcome. Each site will be accompanied by a 1:1250 or suitable scale Ordnance Survey map.
- 2.6 This information will be presented in a draft SLAA Report, which like all technical studies, will be endorsed by East Herts Council. The Council will then publish its final SLAA Report which will form part of the evidence base to inform the East Herts LDF.
- 2.7 The SLAA report will provide a robust assessment of available developable land in East Herts for the period to 2031 that will inform policy decisions in the East Herts LDF. It will also form the basis for calculating the Council's continuous five-year supply in respect of housing land as part of its housing trajectory. The intention is that the SLAA will be updated annually as part of the preparation of the Council's Annual Monitoring Report (AMR). Further information is set out in Phase 6 (Section 8.0 of this Plan).

SLAA and the LDF

- 2.8 By tying the SLAA into the preparation of the Core Strategy, East Herts Council will have robust evidence as part of the formal plan-making process, as to the broad locations in East Herts that are suitable for development. Such an approach will ensure that East Herts Council is not pre-determining nor unduly constraining suitable broad locations: actions that would undermine the robustness of this piece of technical work. It will also enable co-ordination with technical work being undertaken in respect of reviewing the Green Belt across East Herts. This is important in order to ensure the robustness of any Green Belt review and the long-term endurance of Green Belt boundaries.
- 2.9 In respect of housing, the SLAA will inform the Development Strategy in the East Herts Core Strategy and help demonstrate that there are sufficient suitable sites available in the broad locations that have been identified, to meet the East Herts housing requirement. A robust supply of housing will put the Council in a strong position to reject housing in unsuitable locations.

Member Endorsement

- 2.10 The ongoing preparation of the East Herts LDF is overseen by Members through the Council's LDF Executive Panel. Various elements of the SLAA process have been endorsed by the Council. A list of the Reports to the LDF Panel is included in the Appendix C and these, along with the agenda papers and minutes are available to view at www.eastherts.gov.uk/ldfpanel.

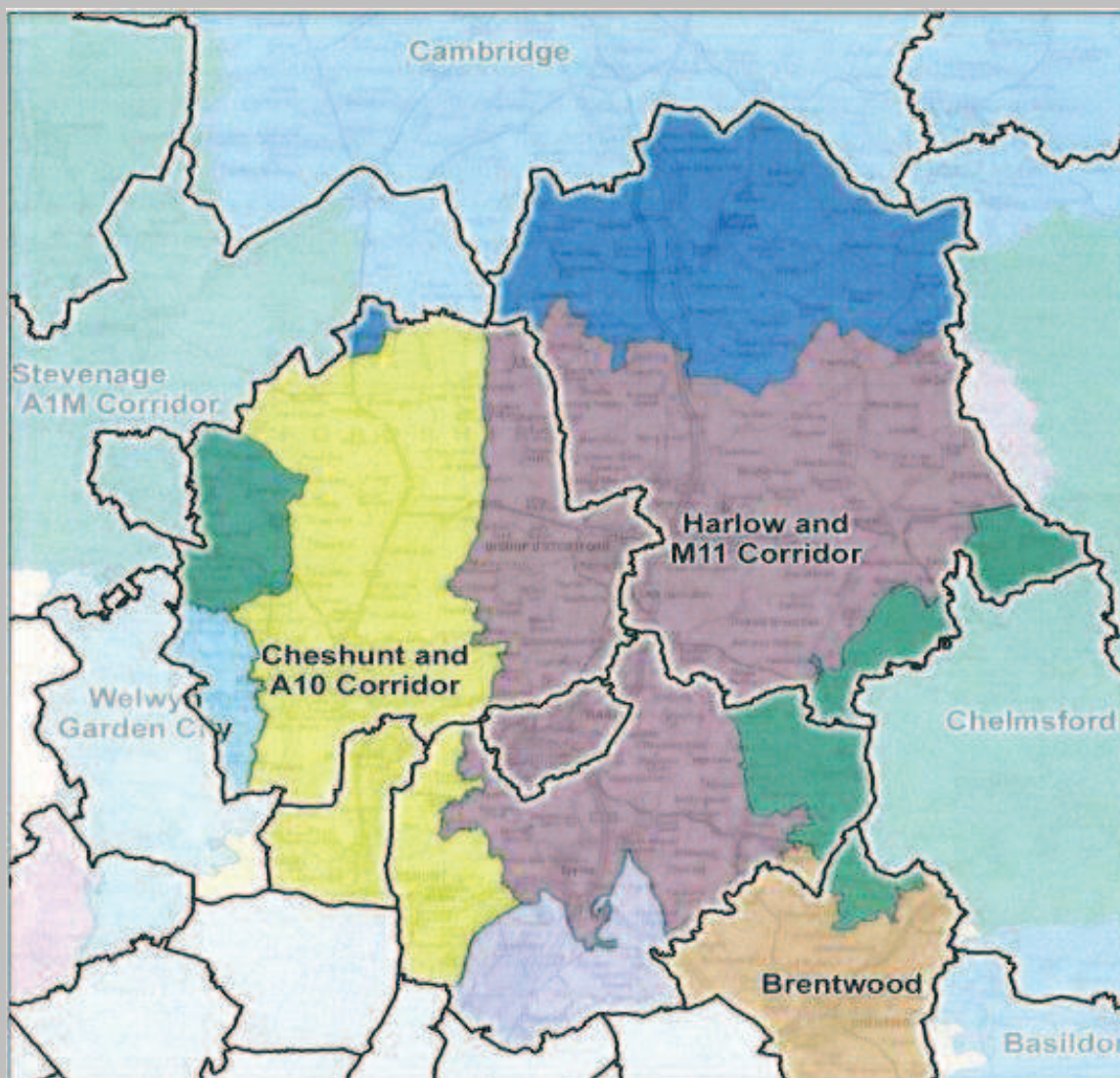
3.0 Phase 1 - Preparation

- 3.1 Phase 1 deals with the more detailed management issues of the SLAA such as the issue of joint working and the identification of sources of information. It differs from the methodology which simply outlines the broad approach for undertaking the SLAA.

Joint Working

- 3.2 East Herts is not an island and there are numerous cross-border issues, not least in the flow of commuters in and out of East Herts. It is also true that many towns, Bishop's Stortford for example, provide services (e.g. education) to residents in neighbouring districts.

Figure 3: Housing Markets in the London Commuter Belt (East)/M11



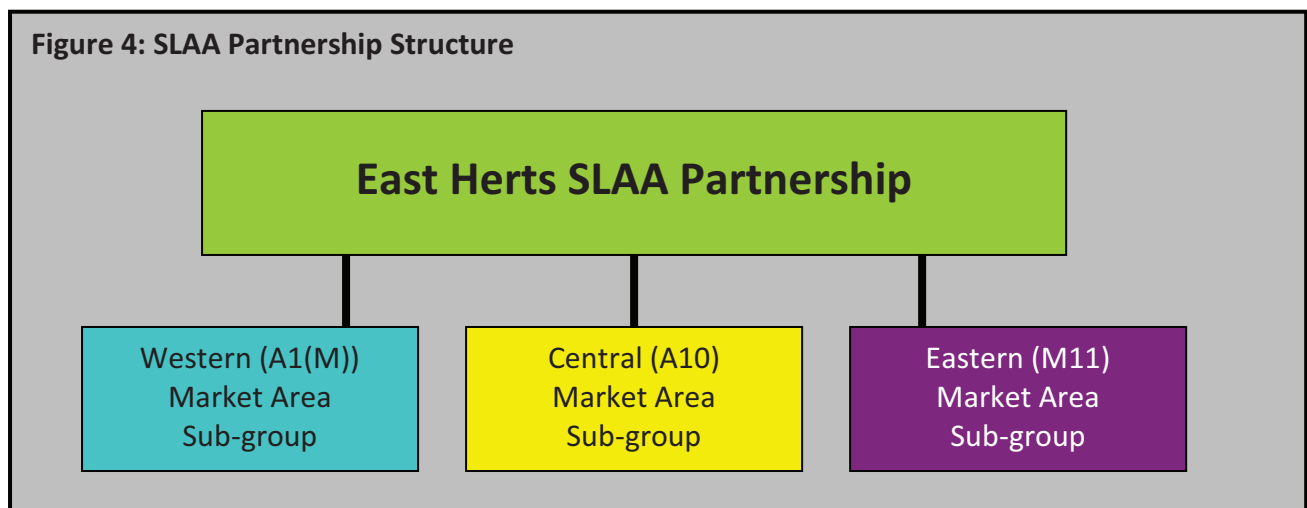
- 3.3 In respect of housing, East Herts does not function as a single housing market area and the district sits within the much wider London Commuter Belt Housing Sub-region. Figure 3

shows the housing markets within the Housing Sub-region¹⁰. Furthermore, within each housing market there are further variations in house prices at post-code level.

- 3.4 Whilst joint working was undertaken for Strategic Housing Market Assessment (SHMA) purposes, some neighbouring local authorities are further advanced in the preparation of their respective LDFs, and as such have already completed or are currently undertaking their SHLAAs. Whilst Harlow Council is at a similar stage to East Herts in both its Core Strategy and SHLAA, and there are cross-boundary issues stemming from the identification of Harlow as a Key Centre for Development and Change (KCDC)¹¹ in the East of England Plan, the housing challenge facing Harlow and the legacy of its New Town heritage mean that land supply issues are somewhat different. There is little merit, therefore, in undertaking joint SLAA (SHLAA) work.

SLAA Partnership

- 3.5 The Practice Guidance recommends that a Partnership is established consisting of key stakeholders such as house builders, social landlords, local property agents, local communities and other agencies, where they have a recognised interest in an area¹². The purpose of the Partnership is to provide advice and guidance on assessing the deliverability of sites.
- 3.6 Given the geographic nature of East Herts, and the variety of stakeholders involved, it is proposed that that three Sub-groups are established reflecting the three main housing market areas identified in Figure 3 (above). The benefit of this approach is that not only should it increase levels of engagement with the SLAA process, but that members of the Sub-groups will have greater expertise of the local property market and area.



- 3.7 The district-wide SLAA Partnership will include representatives of the different stakeholder groups. Its purpose will be to endorse the methodology and assumptions, prior to the assessment process, and then to quality check and risk assess the conclusions of the Sub-groups. Stakeholders will then be placed into the relevant Sub-grouping and it will be these

¹⁰ Figure 15, London Commuter Belt (East)/M11 Strategic Housing Market Assessment (SHMA), prepared by ORS on behalf of Brentwood, Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford Councils, January 2010

¹¹ Key Centre for Development and Change, Policies SS3 and HA1, East of England Plan (GO-East, 2008)

¹² Paragraph 11, SHLAA Practice Guidance (CLG, 2007)

area Sub-groups that will undertake the actual site assessments. As such, certain stakeholders or stakeholder representatives may sit on all three of the Sub-groups. The Partnership structure is set out in Figure 4.

- 3.8 Given the wider scope of the SLAA and the creation of Local Enterprise Partnerships (LEPs), including the Hertfordshire wide LEP, it may be that there are existing forums that can form the basis of the Partnership and contribute to the assessment of all sites, including those proposed for employment, retail, leisure and community uses. Although stakeholders were engaged in the preparation of both the SHMA and the SHMA Viability Assessment,¹³ a formal housing market partnership was not established. It is proposed, however, that those stakeholders involved in the SHMA with an interest in East Herts, should be invited to sit on the SLAA Partnership.

Figure 5: List of Key Stakeholders

All 3 Area Sub-group Stakeholders

- Campaign to Protect Rural England
- East Herts Chambers of Commerce
- East Herts Council (e.g. Planning, Engineering, Environmental Health)
- East Herts Local Strategic Partnership (LSP) Organisations
- English Heritage
- Environment Agency
- Hertfordshire County Council (e.g. Highways, Transport, Environment)
- Hertfordshire Local Enterprise Partnership (LEP) Organisations
- Hertfordshire Local Strategic Partnership (LSP) Organisations
- Homes and Communities Agency
- Home Builders Federation
- Natural England
- Thames Water

Specific Area Sub-group Stakeholders (as appropriate)

- Call for Sites Consultees
- East Herts Civic Societies
- East Herts Town Clerks / Town Council Officers
- East Herts Parish Clerks
- Housing Developers
- Neighbouring Local Planning Authorities
- Planning Consultants / Agents
- Registered Social Landlords (involved in new build projects)
- SHMA and SHMA Viability Stakeholders
- Small Scale House Builders
- Volume House Builders

- 3.9 Key stakeholders who will be invited to sit on the partnership are listed in Figure 5. Where there are numerous stakeholders (e.g. parish councils), a representative may be appointed.

¹³ Undertaken by Level on behalf of Brentwood, Epping Forest, East Herts, Harlow and Uttlesford Councils, Aug 2010

Invitations will be sent to a number of agencies although it is recognised that not all of them will be able attend/participate.

- 3.10 Due to the technical nature of this work and in order to maintain a clear distinction from the policy-making process, it is proposed that county, district, and town and parish councillors are not invited to sit on the partnership. Councillors will however, be kept informed of progress on the SLAA. For the avoidance of doubt, Figure 6 identifies which parishes will be included within each area Sub-group. In addition, endorsement from East Herts Council Members through the LDF Executive Panel will be sought for both this Project Plan and the Draft SLAA Report. Appendix C lists SLAA related LDF Panel Reports.

Figure 6: Parishes by Area Sub-group

Western (A1(M)) Market Area Sub-group	Central (A10) Market Area Sub-group		Eastern (M11) Market Area Sub-group
Aston Benington Bramfield Datchworth Hertingfordbury Little Berkhamstead Tewin Walkern Watton-at-Stone	Anstey Ardeley Aspenden Bayford Bengeo Rural Braughing Brickendon Liberty Buckland Buntingford Cottered Great Amwell Great Munden Hormead Little Munden	Hertford Hertford Heath Puckeridge Sacombe Standon Stanstead Abbots Stanstead St Margarets Stapleford Thundridge Ware Wareside Westmill Wyddial	Albury Bishop's Stortford Brent Pelham Eastwick Furneux Pelham Gilston High Wych Hunsdon Little Hadham Meesden Much Hadham Sawbridgeworth Stocking Pelham Thorley Widford

- 3.11 The Practice Guidance¹⁴ recommends that key stakeholders are involved from the outset so that they can help shape the approach undertaken¹⁵. For practical reasons it has not been possible to engage with stakeholders in the preparation of this Project Plan nor in the work that has been and will be undertaken prior to the formal establishment of the Partnership. It is not considered that this affects the robustness of the approach since as part of the formal establishment of the Partnership, both the terms of reference and the detailed methodology for assessing the deliverability of sites will be consulted on with key stakeholders. Furthermore, the SLAA is being integrated into the preparation of the LDF Core Strategy itself, which is subject to extensive stakeholder engagement.

SLAA Partnership Management

- 3.12 Agreed Terms of Reference that set out the scope and role of the Partnership will ensure that it is effective. Draft Terms of Reference are attached at Appendix D. A representative of

¹⁴ Strategic Housing Land Availability Assessments: Practice Guidance (CLG, 2007)

¹⁵ Paragraph 11, Strategic Housing Land Availability Assessments: Practice Guidance (CLG, 2007)

East Herts Council will chair all meetings and will hold the casting vote in any decisions made. East Herts Council will aim for a consensus on the result amongst relevant Partnership members. Members of the Partnership will be expected to indicate where potential conflicts of interest might arise with regard to sites that are being considered and shall take no part in the deliberations concerning such sites.

- 3.13 Meetings will be held during normal office hours at East Herts Council offices. If a stakeholder is unable to attend, a nominated substitute will be accepted. Notes of meetings will be taken and minutes recorded which will be published and made available following publication of the SLAA Report itself. Membership of the SLAA Partnership will be on a voluntary/unpaid basis. East Herts Council will not be liable for any expenses incurred by Partnership Members during the SLAA process.
- 3.14 The SLAA report will be prepared on behalf of the partnership and East Herts Council. Copyright will rest with East Herts Council. The SLAA, including the site surveying and the initial assessment of whether the site is suitable for development, will be led by the Planning Policy Team using existing staffing resources. Quality Assurance will be ensured through the review mechanism (see Phase 5 - Section 7.0) provided by the district-wide Partnership.

Risk Management

- 3.15 The greatest risk associated with this project is in respect of public relations and the potential for members of the public to misunderstand the purpose of the SLAA, believing either that decisions about where development will go have already been made, circumventing the due planning process, or that the Council is proposing to develop a particular piece of land, without the landowners' consent. Notwithstanding this, splitting the project into a number of discrete stages and tying it into the plan-making process already appears to have been beneficial, especially in respect of Phase 2.
- 3.16 Any fieldwork and surveys will be undertaken from public land and public rights of way. The completion of the Call for Sites Pro-forma, gives consent for Council Officers to access the site in order to assess its suitability, although prior permission with the landowner would be preferable. Phase 3 of this study has the potential to pose a number of risks including contact with members of the public. However, these risks are not considered to be any greater than those risks usually associated with undertaking planning site visits or survey work. Undertaking survey work is also subject to weather conditions and should not be carried out if there is a risk of bad weather such as fog, snow or ice.

Sources of Sites

- 3.17 Except for more clear-cut designations such as Sites of Specific Scientific Interest (SSSI), the scope of the SLAA should not be narrowed down by existing policies designed to constrain development¹⁶. On this basis, given the geographic nature of East Herts - a rural district made up of five market towns and some one hundred villages - potentially the whole district (477 square kilometres) would be subject to assessment. This would not be an efficient or effective use of resources.

¹⁶ Paragraph 21, Strategic Housing Land Availability Assessments: Practice Guidance (CLG, 2007)

- 3.18 A key issue for the SLAA will be the decision as to which sites outside settlements will be assessed. It is anticipated that these will generally be peripheral greenfield sites and perhaps some non-urban brownfield sites. Sufficient sites outside existing settlement boundaries should be included to enable the authority to be as confident as possible that enough developable sites will be identified to meet the housing target, and to provide for the genuine consideration of alternatives as part of the plan-making process.¹⁷ Figure 7 lists the sources of sites that will be considered.

Figure 7: Sources of Sites

Sites in the Planning Process

- Planning permissions for housing development that are under-construction
- Unimplemented/outstanding planning permissions for housing
- Local Plan Housing Allocations
- Land allocated (or with permission) for employment or other land uses which are no longer required for those uses (such sites to be considered as part of the review of the Employment Land and Retail and Town Centre technical studies)

Sites Not Currently in the Planning Process

- Local Plan Inquiry 2005/06 Omission Sites
- Housing Capacity Assessment (HCA) 2007 Sites
- Call for Sites suggestions - 2009 Onwards
- Vacant and derelict land and buildings
- Surplus public sector land
- Land in non-residential use including utilities, leisure, employment and retail (the latter two categories to be considered as part of the review of the Employment Land and Retail and Town Centre technical studies)

- 3.19 East Herts Council has undertaken technical studies to inform policy decisions on employment,¹⁸ retail¹⁹ and open space.²⁰ The recommendations of these studies will inform decisions in respect of these land uses. The SLAA work will also feed into a review of these studies, as appropriate. It should also be noted that in many instances, employment, retail, leisure and community uses will come forward on sites as part of a housing or housing-led mixed-use scheme.
- 3.20 The Practice Guidance also lists a number of other sources of potential sites as shown in Figure 8. However, for the reasons given in italics in Figure 8, it is not considered that these sources require further exploration.
- 3.21 Greenfield sites are being considered because they may be suitable for development. We can not rule them out simply because they are currently undeveloped. However, this is not to say that they will be developed. Indeed, it may be that development on greenfield land is

¹⁷ Paragraph 23, Strategic Housing Land Availability Assessment and Development Plan Document Preparation (PAS/POS, July 2008)

¹⁸ Employment Land and Policy Review (Halcrow, 2009)

¹⁹ Retail and Town Centres Study (Chase and Partners, 2009)

²⁰ Playing Pitch strategy and Outdoor Sports Audit (KKP, 2010)

preferable to re-development within the existing urban areas that may result in intensification and significant change to the character of an area. To reiterate, the purpose of the SLAA is to provide a pool of sites from which the Council can select the most sustainable and appropriate sites to be developed through the policy making and planning process.

Figure 8: Discounted Sources of Sites

- Additional housing opportunities in established residential areas, such as under used garage blocks - *These opportunities have been included within the HCA which identified garage blocks and vacant parcels of land*
- Large scale redevelopment and re-design of existing residential areas - *It is not considered that this source is applicable to East Herts give the nature of, and challenges facing, the district.*
- Sites in rural settlements and rural exception sites - *The HCA identifies sites in Category 1 and 2 Villages rather than just the urban areas. The identification of sites in other rural areas will be subject to whichever broad locations are identified as the Council's Preferred Option.*
- Urban Extensions - *The HCA included an Edge of Settlement Assessment that looked at the type of land that could come forward as urban extensions. The Call for Sites has also suggested sites for urban extensions. The further identification and assessment of such will be subject to whichever broad locations are identified as the Council's Preferred Option.*
- New Free Standing Settlements - *The further identification and assessment of such will be subject to whichever broad locations are identified as the Council's Preferred Option.*

4.0 Phase 2 - Evaluation

- 4.1 Phase 2 evaluates existing information in respect of identifying which sites and areas should be surveyed. Because the SLAA is being tied into the preparation of the LDF, it builds on existing work that has already been undertaken, both as part of the technical and plan-making process.
- 4.2 In 2006, consultants undertook a Housing Capacity Assessment (HCA) for East Herts district that sought to estimate the housing potential of existing urban areas including the Six Main Settlements, and Category 1 and 2 Villages as identified in the East Herts Local Plan 2007, reflecting the geographic and rural nature of East Herts. This technical work included a detailed street survey as well as a desk-top review to identify sites with housing potential, again reflecting the fact that in East Herts, a large number of smaller sites come forward for development.
- 4.3 In 2009, the Council initiated a Call for Sites: technical work that sought suggestions from landowners, developers and other interested parties for future development and change of use. This was a bottom-up approach to compliment the top-down survey of the HCA and specifically did not exclude any areas, size of sites or types of site from being suggested.
- 4.4 Finally, in 2010 the Council consulted on its Core Strategy Issues and Options document seeking views from residents and stakeholders as to the suitability of various broad locations for development. The feedback from the Issues and Options will assist with focusing the SLAA survey and assessment to those areas where development is more acceptable.
- 4.5 As such, it is considered that there is a comprehensive and robust basis for the SLAA. It is not considered that further survey work to identify significant numbers of additional sites will be required. Initial SLAA work will involve reviewing and updating this existing information. A summary of tasks is set out in Appendix A.

Housing Capacity Assessment

- 4.6 Previous approaches to identifying land for housing development were based on the urban capacity methodology as advocated by PPG3²¹. The SLAA (SHLAA) approach is somewhat different.
- 4.7 Work on a Housing Capacity Assessment (HCA)²² commenced in Autumn 2006 prior to the publication of PPS3 (2006) and the new approach of the SHLAA. As such the HCA was based on the then current guidance set out in PPG3 (2000) and Tapping the Potential,²³ as well as the emerging approach to housing supply proposed in the draft PPS3. However, the bulk of the work was complete before the publication of the Practice Guidance.

²¹ Planning Policy Guidance Note 3: Housing (DETR, 2000)

²² Prepared by Entec Ltd (Nov 2007) on behalf of East Herts Council <http://www.eastherts.gov.uk/index.jsp?articleid=1962>

²³ Tapping the Potential, (DETR, 2000)

4.8 As such, a brief gap-analysis has been undertaken testing the HCA against the SHLAA requirements to identify areas of further work required to ensure that the HCA can be used as part of the SLAA.²⁴ This is shown in Figure 9.

Figure 9: SHLAA Requirements

SHLAA Core Requirements	Assessment / Analysis of Current Situation	Further Action Required
1. A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary)	<ul style="list-style-type: none"> • HCA includes list of sites • Specific sites & boundaries are shown on maps • Lack of cross referencing 	Maps need to include site references
2. Assessment of the deliverability/developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed	<p>Does HCA include information on specific sites:</p> <ul style="list-style-type: none"> • Availability – No • Suitability – Yes (all are in sustainable settlements) • Achievability – Yes? (timescales) 	<ul style="list-style-type: none"> • Identify availability of sites • Revisit achievability of sites
3. Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)	HCA includes estimated capacity on each site but are density assumptions accurate? (See paragraph 27 of PAS guidance)	Revisit density assumptions?
4. Constraints on the delivery of identified sites	HCA identifies area/% of <u>group</u> constraints on each site – does not identify what specific constraints for each site are	Identify specific constraints for each site as appropriate
5. Recommendations on how these constraints could be overcome and when	HCA identifies area/% of <u>group</u> constraints on each site – does not identify what specific constraints for each site are. Therefore, HCA does not advise how to overcome constraints on individual sites	Once individual constraints are identified, (see above), recommend how to overcome them

4.9 As previously stated, the HCA included the Six Main Settlements of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. Category 1 and 2 Villages are listed in Figure 10 below.

4.10 Following publication, East Herts Council made the HCA available for comment to stakeholders. This was an opportunity to get an independent check on the robustness of the HCA in light of the requirements of the SHLAA as well as an opportunity to suggest further sites. The feedback from this period for comment has informed this Project Plan and is available to view at www.eastherts.gov.uk/technicalstudies.

4.11 A key piece of further work will be to ensure that there is a consistent basis of site information for the SLAA. This means that a SLAA Pro-forma needs to be completed for each HCA site. As part of the updating of the HCA, Planning Policy Officers will survey HCA sites to obtain the additional information relating to site characteristics. This work will also

²⁴ Figure 1, SHLAA Practice Guidance (CLG July 2007)

provide a useful opportunity to obtain up-to-date information on Omission Sites outside settlement boundaries. Omission Sites are those sites submitted by objectors to the Local Plan Inquiry in 2005.

Figure 10: Villages Covered by the HCA

Category 1 Villages

- | | | |
|------------------|---------------|-------------------|
| • Braughing | • Hunsdon | • Tewin |
| • Hertford Heath | • Much Hadham | • Walkern |
| • High Cross | • Puckeridge | • Watton-at-Stone |

Category 2 Villages

- | | | |
|-------------------------------|------------------|--------------|
| • Aston (excluding Aston End) | • Datchworth | • Standon |
| • Bayford | • Furneux Pelham | • Stapleford |
| • Benington | • Great Amwell | • Thundridge |
| • Brickendon | • Hadham Ford | • Wadesmill |
| • Dane End | • High Wych | • Widford |
| | • Little Hadham | |

Call for Sites

- 4.12 In 2009 East Herts Council initiated a Call for Sites as part of the wider SLAA. The Call for Sites sought suggestions from landowners, developers and other interested parties for development and land use, including housing, employment, retail, leisure, community and other uses. The rationale for undertaking a Call for Sites is that it is a 'bottom-up' approach and by default, identifies land that is available for development (in so far as the owner wants to bring it forward for development).
- 4.13 A consequence of Call for Sites is that they tend to identify greenfield sites as opposed to brownfield sites. However, given the fact that the Practice Guidance is clear that existing policy constraints should not fetter consideration of sites or broad locations for development, undertaking a Call for Sites is considered beneficial.
- 4.14 The Call for Sites requires landowners, developers and other interested parties to complete a standard Pro-forma including a 1:1250 or suitable scale site map, to ensure a consistent record of information. The Pro-forma Guidance Note and template are attached at Appendices E and F, respectively.
- 4.15 The results of the initial Call for Sites can be viewed at www.eastherts.gov.uk/callforsites. The Council has not verified any information submitted and inclusion in the Call for Sites is no indication of the suitability of a particular site for development. East Herts Council cannot, therefore, make any comment or commitment about any of the sites suggested at this stage for potential development.
- 4.16 Although there was an initial Call for Sites in 2009, the work is ongoing and the Council will continue to receive suggestions to feed into the SLAA. As part of Phase 3 - Survey, the Call

for Sites information will need to be verified and an assessment made as to the deliverability of the site.

Local Plan Omission Sites

- 4.17 In 2005 the Council consulted on 'Omission Sites' arising out of the formal public consultation on the Deposit and Re-Deposit stages of the East Herts Local Plan Second Review. Omission Sites included those sites suggested by an objector as an allocation, or where an alternative land use was proposed.
- 4.18 Where Omission Sites were located within the Six Main Settlements and Category 1 and 2 Villages, they would have been captured in the HCA. In addition, many Omission Sites may have been re-submitted through the Call for Sites. The remaining Omission Sites provide a further source of sites and as part of Phase 3 - Survey, Omission Sites information will need to be verified and an assessment made as to the deliverability of the site.

LDF Technical Studies

- 4.19 Other technical studies²⁵ prepared as part of the LDF evidence base can also identify potential sites and provide useful information as to site suitability. A list of technical studies that will help identify sites is included in Figure 11. All technical studies will be used as appropriate to inform site selection following the SLAA as part of the plan-making LDF process itself.

Figure 11: List of Technical Studies

- Employment Land Review (Halcrow, 2008)
- Gypsy and Traveller Site Scoping Study (Scott Wilson, 2007)
- Playing Pitch Strategy and Outdoor Sports Assessment (KKP, 2009)
- Retail and Town Centres Study (Chase and Partners, 2008)

- 4.20 These technical studies may provide a further source of sites and as part of Phase 3 - Survey, information will need to be verified and an assessment made as to the deliverability of the site.

Core Strategy Issues and Options

- 4.21 The Call for Sites suggestions have been taken at face value to inform the preparation of the Core Strategy Issues and Options consultation document. They have provided a useful 'reality check' to ensure that, theoretically at least, the options in the Core Strategy are feasible. The Issues and Options consultation documents are available to view at www.eastherts.gov.uk/issuesandoptions. The Development Strategy is the key feature of the Issues and Options which presented six distinct options for development as listed in Figure 12.

²⁵ All technical studies are available to view and download at www.eastherts.gov.uk/technicalstudies

Figure 12: Development Strategy Options

- Option A: Towns
- Option B: Towns and Larger Service Villages
- Option C: Towns, Larger Service Villages and Smaller Service Villages
- Option D: Towns, Larger Service Villages, Smaller Service Villages and Other Villages/Hamlets
- Option E: Towns, East of Stevenage and East of Welwyn Garden City
- Option F: Settlements within Transport Corridors

4.22 It was not considered appropriate to base the Issues and Options on sites identified through the HCA since the HCA was a top-down study and no assessment has yet been made regarding the availability of these sites. They will of course be fed into the plan-making process, as appropriate, via the SLAA.

4.23 The feedback from the Issues and Options consultation and other evidence will be used to inform the identification of suitable broad locations for development. In other words, narrow down the areas of the district within which sites need to be surveyed and assessed. Identifying suitable areas through the formal plan-making process ensures that this approach is robust. As the Council prepares the Core Strategy and its Preferred Option becomes known, the assessment of SLAA sites can begin in earnest.

Task Summary

4.24 A Summary of the Tasks necessary to complete Phase 2 is set out below:

Phase 2 - Task Summary

Task	Date	Completed
2a Publish Housing Capacity Assessment (HCA)	Autumn 07	✓
2b Update HCA: HCA for 'Period For Comment'	Spring 08	✓
2c Update HCA: Identify postal addresses for HCA sites	2010	✓
2d Update HCA: Assess HCA sites against planning permissions	2010	✓
2e Undertake Call For Sites	Spring 09	✓
2f Issues and Options Consultation	Autumn 10	✓
2g Issues and Options Feedback Analysis	Summer 11	Ongoing

5.0 Phase 3 - Survey

- 5.1 A detailed street by street survey will not be undertaken since this work was undertaken through the Housing Capacity Assessment (as explained in Section 4.0). It is also considered that along with the Call for Sites, Omission Sites and technical studies, comprehensive coverage of suitable sites across the district has been achieved.
- 5.2 Furthermore, the use of the standard Call for Sites Pro-forma has ensured a standard approach to data collection. For those sites that were not identified through the Call for Sites process (such as through the HCA, remaining Omission Sites and sites identified by technical studies), an edited Pro-forma will be completed for each site.
- 5.3 As much information as possible will be collated through a desk-top survey of sites using aerial photography and GIS information. Where information is not available, or information needs to be clarified, a field survey/site visit will be undertaken by members of the Planning Policy Team. A set of Frequently Asked Questions (FAQs) will be available to members of the public should they enquire as to the purpose of the survey work. The FAQs are attached at Appendix G.
- 5.4 A Summary of the Tasks necessary to complete Phase 3 is set out below:

Phase 3 - Task Summary			
Task		Date	Completed
3a	Complete SLAA Pro-formas for HCA Sites	Spring 11	
3b	Complete SLAA Pro-formas for remaining Omission Sites	Spring 11	
3c	Complete SLAA Pro-formas for technical study sites	Spring 11	
3d	Site Survey (Clarification)	Spring 11	

6.0 Phase 4 - Assessment

- 6.1 There are two aspects to site assessment: the estimation of the development potential of each site and an assessment of the deliverability of each site. Whilst separate, they should be considered in parallel since potential can affect deliverability. Indeed, co-ordination will be needed to identify what the most suitable use on a site is, bearing in mind evidence and objectives to create sustainable mixed communities.
- 6.2 Owing to the value associated with housing development and the demand for housing, it is anticipated that there will be pressure to favour housing development or housing-led development on the majority of sites. Indeed, it is anticipated that the SLAA will include an estimation of housing potential on the majority of sites. In many instances however, employment, retail, leisure and community uses will come forward on sites as part of a housing or housing-led mixed-use scheme. Thus, it may be appropriate for the SLAA to include a presumption for the retention of the existing non-residential uses. This is especially crucial in maintaining the role and function of market towns.
- 6.3 Deliverability is an assessment of the suitability, availability and achievability of a site for development at some point in the future²⁶. A site is considered to be deliverable if it is available now, offers a suitable location for development and there is a reasonable prospect of development being delivered within five years. A site is considered developable if it is in a suitable location and there is a reasonable prospect that it will be available and be developed at a specific point in time. In respect of housing, this information will be used to demonstrate that the Council can deliver a continuous five year supply of housing as part of its housing trajectory.
- A site is considered **suitable** for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. In considering suitability, policy restrictions, physical constraints, potential impacts of developing the site and the environmental conditions which would be experienced by prospective residents should all be considered.
 - A site is considered **available** for development, when on the best information available there is confidence that there are no legal or ownership problems. This means that the site is controlled by a housing developer who has expressed an intention to develop or the land owner has expressed an intention to sell.
 - A site is considered **achievable** for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. Achievability is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and sell the site.
- 6.4 The assessment of the deliverability of individual sites will be undertaken on behalf of the East Herts SLAA Partnership. It should be stressed that the assessment of the deliverability of individual sites is a technical assessment and not a policy decision. The SLAA will not make judgements about whether sites should be allocated through plan policy. Potential sites for new development which have been identified through the SLAA will be further tested through the plan making process for Development Plan Documents, including

²⁶ Paragraph 54, PPS3 (CLG, 2010)

Sustainability Appraisal, stages of public participation and consultation, and independent examination.

Annual Monitoring and Assessment Prioritisation

- 6.5 As explained in Section 2.0, the SLAA will form the basis for calculating the Council's housing trajectory as set out in the Annual Monitoring Report (AMR). The AMR is prepared every autumn and published in December. For the next AMR, the intention will be to base the housing trajectory on actual SLAA sites and information.
- 6.6 However, because the SLAA is a technical piece of work and assesses the deliverability of all sites, by default it will include sites where development is inappropriate, such as those in the Green Belt or Rural Area beyond the Green Belt. Clearly, such sites could not be included in the housing trajectory as they are contrary to current planning policy and in general, should not be developed. Including them in the trajectory would also weaken the purpose of the SLAA itself, which is to provide a technical assessment of deliverability: not to take policy decisions, such as the re-designation of land. This is the role of the LDF plan-making process.
- 6.7 For these reasons, the assessment of sites will be prioritised starting with those sites where there is no in-principle objection to their development, such as those sites within town and Category 1 Village boundaries. As these sites could come forward for development at any time, Council endorsement of the SLAA is not required for their inclusion within the AMR and the housing trajectory. The remaining SLAA sites will then be assessed and all sites included in the draft SLAA Report.

Estimating Housing Potential

- 6.8 The housing potential of each site should be guided by existing or emerging planning policy, and reflect a judgement on what can be accommodated reasonably on each particular site. An initial estimation will be undertaken by Planning Policy Officers in consultation with colleagues in Development Control. This will require some general assumptions about housing mix, housing density and scheme viability. To inform these decisions, East Herts Council has undertaken a Strategic Housing Market Assessment (SHMA) and SHMA Viability Assessment. These can be viewed online at www.eastherts.gov.uk/technicalstudies.
- 6.9 The SHMA considers housing need and demand and recommends housing type, size and tenure mix including the affordable housing percentage and threshold. The SHMA Viability Assessment is a strategic assessment that tests the findings of the SHMA on a range of notional sites. The SHMA Viability Assessment acknowledges that any assessment of viability should be undertaken on a site-by-site basis because viability is both site and scheme specific. However, it has been essential to undertake a strategic assessment of viability so as to be able to agree the policy parameters that will be tested on a site-by-site basis through the SLAA. Thus, in addition to providing information about the deliverability of land, the SLAA will also inform along with the SHMA studies and the Council's housing objectives, affordable housing policy.
- 6.10 Initial estimates will be based on the following density assumptions:
- Sites up to 1 hectare = 30 dwellings per hectare (gross)

- Sites over 1 hectare = 20 dwellings per hectare (gross) allowing for open space and other infrastructure provision

6.11 As part of the Housing Capacity Assessment, the housing potential of each site was estimated by consultants using the following density assumptions, based on accessibility by public transport to key services (i.e. retail land uses, employment land uses, GP Surgeries, Primary Schools, Hospitals). Undertaking Phase 4 will enable a timely update of this original work, especially following changes to PPS3²⁷ in respect of density in June 2010.

- 75 dph - 10min public transport accessibility
- 55 dph - 20min public transport accessibility
- 40 dph - 30min public transport accessibility

6.12 The housing potential of a site is a significant factor that affects economic viability. As such, the assessment of site deliverability should be considered in parallel with the estimation of development potential. Thus, the first role of the SLAA Partnership will be to verify the housing potential of each site.

Assessing Deliverability: Suitability

6.13 Assessing whether a particular site is suitable for a particular type of development forms the basis of the planning system. The SLAA provides a technical assessment to inform that decision-making process: it does not replace it. A co-ordinated approach to assessing site suitability and land-use is required, bearing in mind the aim of the planning system and wider planning objectives to create sustainable, mixed and viable communities. This approach dovetails neatly with the Government's emerging Localism agenda.

6.14 The following factors will be considered when assessing suitability. Where constraints exist, the assessment should consider what action would be needed to overcome them.

- *Policy Restrictions* - including planning designations as well as wider corporate objectives
- *Physical Restrictions* - e.g. access, infrastructure, flood risk, contamination, ground conditions
- *Potential Impacts* - effect upon landscape features and conservation
- *Environmental Conditions* - experienced by prospective residents

6.15 As already explained, the SLAA will assess the deliverability of all sites including those that are currently in the Green Belt. As with other constraints, this policy restriction will be noted, but its current policy designation will not automatically remove it from the SLAA. Instead, the SLAA will include an interim list of non-Green Belt sites. This interim list will then inform the plan-making process as to what extent the Council needs to consider sites that are currently in the Green Belt.

Assessing Deliverability: Availability

6.16 A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems (e.g. multiple owners,

²⁷ The national indicative minimum of 30dph was deleted from paragraph 47 of PPS3 following its revised publication in June 2010. However, the requirement to make the effective and efficient use of land (e.g. paragraph 10) remains.

ransom strips, tenancy or operational requirements of landowners) that would prevent the site from coming forward for development.

- 6.17 In other words, the site is controlled by a developer who has expressed an intention to develop or the landowner has expressed an interest to sell. It should be noted, however, that the existence of a planning application does not necessarily mean that the site is available. Where problems have been identified, an assessment should be made as to how and when they can realistically be overcome.

Assessing Deliverability: Achievability

- 6.18 A site is considered achievable for development where there is a reasonable prospect that development will come forward at a particular point in time. In essence, this is a judgement about the economic viability of a site as well as the capacity of the developer to complete and sell the site over a certain period. Achievability is affected by:

- *Market Factors* - e.g. adjacent and alternative on-site uses in relation to land value, level of potential market demand etc
- *Cost Factors* - e.g. build and development costs, S106 contributions etc
- *Delivery Factors* - e.g. phasing, build out rates, capacity of developer etc

- 6.19 The SHMA Viability Assessment²⁸ will be used to assist whether development is economically viable as well as the views and experience of the SLAA partnership. Again, where problems exist, the assessment should consider what action would be needed to overcome them.

Task Summary

- 6.20 A Summary of the Tasks necessary to complete Phase 4 is set out below:

Phase 4 - Task Summary			
Task		Date	Completed
4a	Estimate housing potential	Summer 11	
4b	LDF Executive Panel approve SLAA Methodology	7 July 11	
4c	Establish SLAA Partnership and Sub-groups	Summer 11	
4d	Partnership to agree methodology and key assumptions	Summer 11	
4e	Sub-groups to assess deliverability	Summer 11	
4f	Prepare Interim list of SLAA sites	Autumn 11	

²⁸ Available at www.eastherts.gov.uk/technicalstudies

7.0 Phase 5 - Review

- 7.1 Once Phases 3 and 4 have been completed an initial SLAA report will be prepared. In respect of housing, this will include an indicative housing trajectory that sets out how much housing can be provided and at what point in the future.
- 7.2 An overall (risk) assessment will also be prepared as to whether sites will come forward as anticipated. Should it be concluded that insufficient sites have been identified and that further sites need to be sought, or that some of the assumptions made need to be revisited, then further work in respect of Phases 3 and 4 will be undertaken. In arriving at its conclusions, the risk assessment should consider the nature of the development market in East Herts including how quickly sites may be developed and whether a five year supply of identified sites can be maintained.
- 7.3 Phase 5 will also incorporate Stages 9 and 10 of the SHLAA methodology as shown in Figure 2 above, as appropriate. This includes identifying and assessing broad locations, such as urban extensions, where necessary and including an allowance for Windfall Sites if this can be justified. For example, if there is a steady supply of land from certain sources (e.g. back land development), but individual specific sites cannot be identified.
- 7.4 A Summary of the Tasks necessary to complete Phase 5 is set out below:

Phase 5 - Task Summary			
Task		Date	Completed
5a	Publish initial report for consideration by Partnership	Autumn 11	
5b	Partnership to provide risk assessment	Autumn 11	
5c	Further survey and assessment work (if required)	-	
5d	SHLAA Stages 9 and 10 (if required)	-	

8.0 Phase 6 - Evidence

- 8.1 On its publication, the SLAA Report will form part of the evidence base for the East Herts LDF. It will provide information to demonstrate that there is sufficient deliverable land to deliver the Council's Preferred Option in its Core Strategy
- 8.2 In parallel with the preparation of the Core Strategy Preferred Options, the Council will begin preliminary work on its Site Allocations DPD. It is through this document that decisions will be made as to the suitability of a particular site for development, based on the evidence and list of sites in the SLAA.
- 8.3 The Site Allocations DPD will also determine which sites should be allocated for development (whether housing, employment, retail, leisure or community uses) through the LDF. It will also determine which sites should be designated for a particular use, based on the strategic approach set out in the Core Strategy.
- 8.4 For some or all of the allocated sites, it may be appropriate to produce Concept Statements that set out the type of development the Council envisages for each site. These brief documents (e.g. two sides of A4 paper that set out the design and policy principles), give both certainty to the developer and assurance to the local community that high quality development will come forward on site. The Site Allocations process may also be informed by settlement wide design work in the Core Strategy.
- 8.5 The SLAA will be monitored through the Annual Monitoring Report (AMR) process, including setting out the Council's housing trajectory, and demonstrating a continuous five year supply of housing, as required by PPS3. Through this process, the SLAA will be updated and new sites included. It is anticipated that new sites will be identified as an ongoing process although an annual Call for Sites may prove a useful medium. Following this, suggestions will be surveyed (Phase 3) and assessed (Phase 4), reconvening the SLAA partnership.
- 8.6 A Summary of the Tasks necessary to complete Phase 6 is set out below:

Phase 6 - Task Summary			
Task		Date	Completed
6a	Draft SLAA Report to LDF Executive Panel	24 Nov 11	
6b	Final SLAA Published Following Council Agreement	14 Dec 11	
6c	Publication of Core Strategy Preferred Options	2012	
6d	Preparation of Site Allocations DPD	2012	
6e	Annual Review and Monitoring	Autumn 2011 +	

9.0 Conclusion

- 9.1 The SLAA will provide East Herts Council with a robust assessment of available developable land in East Herts for the period to 2031 that will inform policy decisions in the East Herts LDF. It will also form the basis for calculating the Council's continuous five-year supply in respect of housing land as part of its housing trajectory.
- 9.2 It should be stressed that the SLAA is a piece of technical research work and does not make policy decisions. Thus, the inclusion of a particular site in the SLAA does not mean the site will definitely come forward for development. That decision can only be made through the LDF plan-making or planning application processes. The SLAA simply helps inform these processes.
- 9.3 Ultimately, the SLAA is a list of sites that includes a technical assessment of their deliverability, with information stored in a database format. In terms of outputs, the following will be produced:
- Interim list of non-Green Belt sites (Task 4f)
 - Initial list of sites to be reviewed by the SLAA Partnership (Task 5a)
 - Draft SLAA Report to be considered by the LDF Executive Panel (Task 6a)
 - Final SLAA Report published by East Herts Council (Task 6b)
- 9.4 The draft SLAA report will be prepared on behalf of the SLAA Partnership. This draft report will be subject to Council endorsement via the LDF Executive Panel. As with all planning policy technical studies, whilst Members will have the opportunity to comment on the findings of the study, it is not intended that changes to the technical assessment will result.
- 9.5 Following agreement by Council, the Final SLAA Report will be published and used to inform the preparation of the East Herts LDF and planning processes.
- 9.6 The intention is that the SLAA will be updated annually as part of the preparation of the Council's Annual Monitoring Report (AMR).

Appendix A: Summary of SLAA Tasks

Task		Date	Completed
2a	Publish Housing Capacity Assessment (HCA)	Autumn 07	✓
2b	Update HCA: HCA for 'Period For Comment'	Spring 08	✓
2c	Update HCA: Identify postal addresses for HCA sites	2010	✓
2d	Update HCA: Assess HCA sites against planning permissions	2010	✓
2e	Undertake Call For Sites	Spring 09	✓
2f	Issues and Options Consultation	Autumn 10	✓
2g	Issues and Options Feedback Analysis	Summer 11	Ongoing
3a	Complete SLAA Pro-formas for HCA Sites	Spring 11	
3b	Complete SLAA Pro-formas for remaining Omission Sites	Spring 11	
3c	Complete SLAA Pro-formas for technical study sites	Spring 11	
3d	Site Survey (Clarification)	Spring 11	
4a	Estimate housing potential	Summer 11	
4b	LDF Executive Panel approve SLAA Methodology	7 July 11	
4c	Establish SLAA Partnership and Sub-groups	Summer 11	
4d	Partnership to agree methodology and key assumptions	Summer 11	
4e	Sub-groups to assess deliverability	Summer 11	
4f	Prepare Interim list of SLAA sites	Autumn 11	
5a	Publish initial report for consideration by Partnership	Autumn 11	
5b	Partnership to provide risk assessment	Autumn 11	
5c	Further survey and assessment work (if required)	-	
5d	SHLAA Stages 9 and 10 (if required)	-	
6a	Draft SLAA Report to LDF Executive Panel	24 Nov 11	
6b	Final SLAA Published Following Council Agreement	14 Dec 11	
6c	Publication of Core Strategy Preferred Options	2012	
6d	Preparation of Site Allocations DPD	2012	
6e	Annual Review and Monitoring	Autumn 2011 +	

Appendix B: SLAA Project Timeline

[illegible]

Appendix C: List of SLAA Related LDF Executive Panel Reports

The following table lists SLAA related reports to East Herts Council's LDF Executive Panel. The reports, agenda papers and minutes can be viewed under the relevant meeting date at www.eastherts.gov.uk/ldfpanel.

Date of Panel	Agenda Item	Title of Report	Purpose of Report
26 th July 2007	6	Housing Capacity Assessment	To consider the non-technical summary of the study
22 nd November 2007	8	Housing Capacity Assessment and Edge of Settlement Assessment	To consider the revised study and make the HCA available for comment
24 th April 2008	8	LDF Evidence Base - Technical Studies 2007/08 and 2008/09	To agree that various technical studies, including a SHLAA, be undertaken to inform the LDF
17 th July 2008	7	Housing Capacity Assessment and Edge of Settlement Assessment - Responses to Period for Comment	To consider the responses received and inform members of the requirement to produce a SHLAA
6 th November 2008	7	Annual Monitoring Report 2007/08 and Requirement to provide a continuous 5 year supply of housing	To inform Members on the requirement, implications of, and ongoing work to deliver a continuous five year supply of housing
27 th August 2009	8	Strategic Land Availability Assessment - Call for Sites Progress Report	To update Members on the responses to the Call for Sites consultation and to agreement for the responses to be taken into account as part of the preparation of the Core Strategy Issues and Options consultation and the preparation of the East Herts SLAA
27 th August 2009	9	LDF Evidence Base - Technical Studies 2008/09 and 2009/10	To update Members on progress on the various technical studies, including a SLAA, that are being undertaken to inform the LDF
27 th May 2010	5	LDF Core Strategy Issues and Options Consultation Document	To consider and agree the Core Strategy Issues and Options document for 12 weeks public consultation
27 th May 2010	7	Call for Sites Update Report	To update Members on the submissions received to the Call for Sites consultation between 12/08/2009 and 05/05/2010 and seek Member agreement for the responses to be taken into account as part of the preparation of the East Herts SLAA
23 rd September 2010	8	LDF Evidence Base - Technical Studies 2009/10 and 2010/11	To update the Panel on progress in respect of completed and ongoing LDF evidence base related technical studies from 2009/10 and seek agreement to those underway or proposed to be undertaken during 2010/11, including the SLAA

Appendix D: Draft Terms of Reference



East Herts Local Development Framework

Strategic Land Availability Assessment Partnership Terms of Reference

Purpose of the SLAA Partnership

- 1.1 The purpose of the Strategic Land Availability Assessment (SLAA) Partnership is to assist in the preparation of the East Herts SLAA technical study that forms part of the evidence base for the East Herts Local Development Framework (LDF).
- 1.2 The SLAA Partnership will act as an independent body appointed by East Herts Council that is representative of key stakeholders in the district, for the sole purpose of the preparation of the SLAA.
- 1.3 The objectives of the SLAA Partnership are as follows
 - 1. To provide advice and opinions on the deliverability and developability of identified sites in an efficient and timely manner; and,
 - 2. To add value to the SLAA process through the skills, expertise and knowledge of each of the Partnership's members.

Scope of the SLAA Partnership

- 1.4 The background to the SLAA is set out in the SLAA Project Plan, which interprets the Government's standard methodology for undertaking Strategic Housing Land Availability Assessments (SHLAA), as required by Planning Policy Statement 3: Housing (PPS3).
- 1.5 The scope of the SLAA Partnership is as follows:
 - 1. To consider and give advice and opinions on the findings of the initial assessment undertaken by East Herts Council of the suitability of potential development sites within East Herts;
 - 2. To consider and give advice on the availability of the potential development sites by indicating by what five year period for development (if any) the site should be included;
 - 3. To assess the achievability of the potential sites for development which are being assessed for the purpose of the SHLAA.
- 1.6 In considering the developability of the sites, each Partnership member will have regard to any relevant published documents and draw from their own experience. Partnership members will not be expected to advise on areas beyond their experience.

Membership of the SLAA Partnership

- 1.7 Membership of the SLAA Partnership will be on a voluntary/unpaid basis. East Herts Council will not be liable for any expenses incurred by Partnership Members during the SLAA process.

- 1.8 Key stakeholders who will be invited to sit on the partnership are listed in the Project Plan. Where there are numerous stakeholders, a representative may be appointed. If a stakeholder is unable to attend, a nominated substitute will be accepted. The names and contact details of Partnership members will be recorded and published in the SLAA report.
- 1.9 A representative of East Herts Council will chair all meetings and will hold the casting vote in any decisions made. East Herts Council will aim for a consensus on the result amongst relevant Partnership members. Members will be asked to respect the views and opinions of other members and act at all times in a professional and courteous manner.
- 1.10 Meetings will be held during normal office hours at East Herts Council offices. Notes of meetings will be taken and minutes recorded which will be published and made available following publication of the SLAA report itself.
- 1.11 Interest in the development of one or more potential sites will not preclude membership on the Partnership. However, members of the Partnership will be expected to indicate where potential conflicts of interest might arise with regard to sites that are being considered and shall take no part in the deliberations concerning such sites. This does not preclude providing information as to the deliverability (e.g. suitability, availability and achievability) of a particular site.

Operation of the SLAA Partnership

- 1.12 The SLAA report will be prepared on behalf of East Herts Council. Copyright will rest with East Herts Council. The SLAA database will remain the property of East Herts Council, which will be responsible for any amendments to the SLAA database as a result of the Partnerships assessments. East Herts Council will also be responsible for the regular updating and monitoring of the SLAA.
- 1.13 The SLAA Partnership will provide advice and guidance in respect of the deliverability and developability of sites. East Herts Council reserves the right to amend any assessment of sites between the preparation of the draft report and the publication of the final SLAA report.
- 1.14 Partnership members will be provided with all necessary information, which may include unpublished information. They will be required to keep this information confidential until publication of the SLAA report.

Agreement

- 1.15 Agreement of these Terms of References includes acknowledging the purposes of the SLAA to assist with the preparation of the East Herts LDF in a timely manner. Contravention of the Terms of Reference may lead to dismissal from the SLAA Partnership.
- 1.16 I hereby agree to, and abide by, the SLAA Terms of Reference:

Signed:

Dated:

Print Name:

Organisation:

Appendix E: SLAA Call for Sites Guidance Note

Appendix F: SLAA Call for Sites Pro-forma

Appendix G: Frequently Asked Questions



East Herts Local Development Framework Strategic Land Availability Assessment

Frequently Asked Questions

1. What is the Strategic Land Availability Assessment (SLAA)?

The SLAA is a piece of ongoing technical research that will inform the preparation of the East Herts Local Development Framework (LDF) in respect of land supply. It will assist, as appropriate, in determining planning applications.

2. Why do we need a SLAA?

Government planning guidance requires us to produce a SLAA. It helps us demonstrate that we have an adequate supply of land for development to meet our future needs and prove that our LDF is fit for purpose. It is just one way to help pro-actively shape the future of East Herts to 2031.

3. What is the purpose of the SLAA?

The SLAA does two things:

1. It identifies the development potential of sites across East Herts (e.g. how many houses can be built on a site);
2. It provides an assessment of when, if and how the site could be developed. It helps us take policy decisions as to how we can best meet our housing requirement and how much development should go where.

4. What does the SLAA not do?

The SLAA is a technical document and does not make decisions about whether a particular site should be developed. That is the purpose of the planning system, either through the LDF or through a planning application. The SLAA provides information as to whether a particular site could be developed. As such, the SLAA does not automatically rule out sites that are outside of settlement boundaries, currently in agricultural use or in the Green Belt.

5. Why do we need to build more houses anyway?

To meet the existing and future housing needs of the district. The level of housing growth is based on population forecasts and projections. Current demographic evidence suggests that East Herts has an ageing population as well as an increasing number of single person households. Both of these pressures increase the demand for new housing. Lack of housing also has socio-economic consequences with local people being unable to live in their own communities. However, the need for housing must be balanced against social, environmental, and infrastructure considerations. The SLAA informs these considerations.

6. How is the SLAA produced?

The SLAA is produced by East Herts Council in partnership with stakeholders including town and parish councils and representatives of the development industry and the wider planning profession.

7. Will residents be consulted on the results of the SLAA?

Yes. Through consultation on the relevant LDF policy documents residents will be able to comment on the results of the SLAA. However, the SLAA itself won't be consulted on as it is a technical study which is not normally subject to consultation.

8. Haven't you already done this work? Haven't you done a Call for Sites?

Yes, the SLAA is being done in stages and much of the preparation work has already been completed. A Housing Capacity Assessment (HCA) in 2007 looked at the capacity of our towns and villages to accommodate housing development, while the Call for Sites is an ongoing process. It seeks suggestions from landowners, developers and other interested parties for development and change of use.

9. What work still needs to be done?

The technical assessment setting out when, if and how a site could be developed will be carried out by the SLAA Partnership during summer/autumn 2011.

10. How will the SLAA be used?

The SLAA will inform the LDF Core Strategy policy document currently being prepared. It will show that the options chosen by the Council are feasible and that there is sufficient deliverable land in different areas. It will provide a list of sites from which the Council can select the most sustainable. It will also be used to demonstrate that the Council has a five year supply of housing land in the district, as required by the Government.

11. What happens next?

Once work on the SLAA is completed, it will be updated and rolled forward every year. This will not entail starting from scratch, but the SLAA will be monitored to see which sites have been developed and which new sites can be added.

12. Where can I find out more information?

The detailed Methodology and the Council's Project Plan for undertaking the SLAA are available at www.eastherts.gov.uk/sl原因. Government planning guidance is available at <http://www.communities.gov.uk/planningandbuilding>. More information about the East Herts LDF can be found at www.eastherts.gov.uk/ldf. If you have any queries about the SLAA, please contact Planning Policy on 01279 655261 or email planningpolicy@eastherts.gov.uk.

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EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL - 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

LOCAL DEVELOPMENT FRAMEWORK – CALL FOR SITES UPDATE REPORT

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report updates Members on the submissions received to the Call for Sites consultation between 6 May 2010 and 10 June 2011 and seeks Members agreement for the responses to be taken into account as part of the preparation of the East Herts Strategic Land Availability Assessment (SLAA).

<u>RECOMMENDATION TO EXECUTIVE: to commend to Council that:</u>	
(A)	the responses received to the Call for Sites consultation between 6 May 2010 and 10 June 2011, attached at Essential Reference Paper 'B', be noted and taken into account as part of the preparation of the East Herts Strategic Land Availability Assessment (SLAA); and
(B)	any future Call for Sites suggestions be included and assessed as part of the preparation of the SLAA in Summer/Autumn 2011, and subsequently as part of the annual monitoring and review of the SLAA.

1.0 Background

- 1.1 The Core Strategy is the first Development Plan Document (DPD) East Herts Council is producing as part of its Local Development Framework (LDF); the series of spatial planning documents that will replace the 2007 East Herts Local Plan Second Review Saved Policies, and shape the future of East Herts. The Core Strategy is the strategic and overarching planning document for the District and sets the context for the subsequent Site Allocations and Development

Management Policies DPDs.

- 1.2 The Core Strategy should establish the principle of development and identify broad locations for growth based on an analysis of robust evidence. It should seek to ensure the delivery of a continuous supply of housing for at least 15 years.
- 1.3 One of the key pieces of technical work as part of the evidence base is the Strategic Housing Land Availability Assessment (SHLAA). This is essentially a database of housing sites that includes an assessment of their deliverability; that is, their availability, suitability and achievability.
- 1.4 However, given the fact that the LDF is a spatial planning system, it was considered appropriate to broaden the scope of the SHLAA to include all types of land-use and development such as employment and community infrastructure; thus East Herts is in the process of undertaking a Strategic Land Availability Assessment (SLAA).
- 1.5 The first stage of the SLAA is to identify potential sites. Part of this process is the carrying out of a Call for Sites, a bottom-up approach asking landowners, developers and other interested parties, for their suggestions of where they would like to see land brought forward for development at some point in the future.
- 1.6 Members will be aware that an initial three month consultation on the Call for Sites was held between March and June 2009 and a total of 244 submissions were received up to the 12 August 2009.
- 1.7 The LDF Executive Panel on 27 August 2009 considered the responses received to the Call for Sites consultation and the Panel agreed that the sites submitted would be taken into account as part of the preparation of the East Herts Core Strategy Issues and Options consultation document and as part of the preparation of the East Herts Strategic Land Availability Assessment (SLAA).
- 1.8 It was noted that the Call for Sites consultation was an ongoing exercise and that submissions of further sites would be accepted and considered alongside the ongoing development of the Local Development Framework.
- 1.9 It was agreed that additional sites that had been submitted through the process would be reported to Members at appropriate intervals.
- 1.10 A further 16 submissions to the Call for Sites exercise were received

in the period between 12 August 2009 and 5 May 2010. These submissions were considered by the LDF Executive Panel on 27 May 2010 and the Panel agreed that the sites submitted would be taken into account as part of the preparation of the East Herts Strategic Land Availability Assessment (SLAA).

2.0 Report

- 2.1 A further 29 submissions have been received to the Call for Sites in the period between 6 May 2010 and 10 June 2011. It should also be noted that two sites have been resubmitted with amendments regarding the 'Suggested Use' for the site and two sites have been withdrawn from the process. These responses are attached as **Essential Reference Paper 'B'** to this report. As before, the list includes information such as the site address, suggested use and total site area.
- 2.2 Members are therefore asked to note the additional submissions received and agree that they are taken into account as part of the preparation of the SLAA.
- 2.3 This will be the final Call for Sites Update Report to Members. Any future responses to the Call for Sites will be included and assessed as part of the preparation of the SLAA in Summer/Autumn 2011, and subsequently as part of the annual monitoring and review of the SLAA.
- 2.4 For reference purposes a full list of sites submitted to the Call for Sites exercise is attached as **Essential Reference Paper 'C'** to this report.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

- Strategic Housing Land Availability Assessments Practice Guidance (CLG, July 2007)
- LDF Executive Panel Report – 27th August 2009
<http://www.eastherts.gov.uk/index.jsp?articleid=9284>

- LDF Executive Panel Report – 27th May 2010
<http://www.eastherts.gov.uk/index.jsp?articleid=13789>

Contact Members: Councillor M G Carver, Executive Member for
Planning Policy and Economic Development

Contact Officer: Kevin Steptoe, Head of Planning and Building
Control – Ext 1407

Report Author: Laura Pattison, Assistant Planning Policy Officer

ESSENTIAL REFERENCE PAPER 'A'

Contribution to the Council's Corporate Priorities/ Objectives:	<p>Pride in East Herts <i>Improve standards of the built neighbourhood and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
Consultation:	Consultation has taken place internally with the Executive Member for Planning Policy and Economic Development, Director of Neighbourhood Services, Head of Planning and Building Control and the Council's Planning Policy Team.
Legal:	It is a statutory duty under the Planning and Compulsory Purchase Act 2004 for East Herts Council as the local planning authority to produce and keep up to date a sound and robust Development Plan for the District.
Financial:	The preparation of the SLAA will be funded from the Planning Policy/LDF Upkeep Budgets.
Human Resource:	Existing Planning Policy staff resources will continue to project manage the preparation of the SLAA.
Risk Management:	It is a statutory duty under the Planning and Compulsory Purchase Act 2004 for East Herts Council as the local planning authority to produce and keep up to date a sound and robust Development Plan for the District.

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ESSENTIAL REFERENCE PAPER 'B'

RESPONSES RECEIVED TO THE CALL FOR SITES CONSULTATION BETWEEN 06/05/2010 AND 10/06/2011

- Please note: the inclusion of a site or particular area of land in the list below is not in any way an endorsement of a particular site for development. The Call for Sites is part of the SLAA evidence gathering process to inform the LDF plan-making process.
- The sites have been suggested by landowners, developers and other interested parties and simply indicate a desire to bring forward a site for development at some point in the future.
- For information, total site areas have been included below although for larger sites especially, the whole site would be unlikely to be developed.
- For ease of reference the sites are listed by town and parish.
- The Call for Sites is separate from the planning application process and neither the Call for Sites nor the SLAA precludes landowners and developers from submitting planning applications for development.
- As such, at this stage, the Council has not and can not make any comment or commitment in respect of any of the sites suggested.

Ref:	Site Location	Site Address	Site Settlement	Site Area (Ha)	Suggested Use
01	Bishop's Stortford				
01/032	Bishop's Stortford Delivery Office & Post Office	102 South Street	Bishop's Stortford	0.27	Mixed Use
01/033	Land at Styleman's Farm	Hallingbury Road	Bishop's Stortford	4.68	Residential, Affordable Housing, Leisure/ Recreation, Employment
02	Buntingford				
02/011	Land at Aspenden Road	Aspenden Road	Buntingford	0.73	Residential
03	Hertford				
03/024	Hertford Delivery Office	Greencoates	Hertford	0.42	Residential
03/025	Land west of Mangrove Road	Mangrove Road	Hertford	2.76	Residential
04	Sawbridgeworth (No Additional Suggestions Received)				

05	Ware				
05/022	Swains Mill & land south of Crane Mead (Starstage site)	Crane Mead	Ware	0.82	Residential, Affordable Housing
06	Albury (No Additional Suggestions Received)				
07	Anstey (No Additional Suggestions Received)				
08	Ardeley (No Additional Suggestions Received)				
09	Aspenden (No Additional Suggestions Received)				
10	Aston (No Additional Suggestions Received)				
11	Bayford (No Additional Suggestions Received)				
12	Bengeo Rural (No Additional Suggestions Received)				
13	Benington (No Additional Suggestions Received)				
14	Bramfield (No Suggestions Received)				
15	Braughing (No Additional Suggestions Received)				
16	Brent Pelham & Meesden (No Additional Suggestions Received)				
17	Brickendon Liberty				
17/003	Land at Brickendon Grange	Pembridge Lane	Brickendon	0.17	Residential
18	Buckland (No Suggestions Received)				
19	Cottered (No Additional Suggestions Received)				
20	Datchworth				
20/003	Land between 67 & 75 Burnham Green Road	Burnham Green Road	Burnham Green	1.31	Residential
21	Eastwick & Gilston				
21/009	Land south of Eastwick Road & Redricks Lane	Redricks Lane	Gilston	112.97	Residential, Affordable Housing, Community Facility, Leisure/ Recreation, Retail, Renewable Energy
22	Furneux Pelham				
22/003	Land at Violets Lane	Barleycroft End	Furneux Pelham	0.37	Residential
22/004	Land at Tinkers Hill	The Street	Furneux Pelham	0.23	Residential
23	Great Amwell				
23/004	Land surrounding Van Hages Garden Centre	Amwell Hill	Great Amwell	39.37	Residential, Affordable Housing
24	Great Munden (No Suggestions Received)				
25	Hertford Heath (No Additional Suggestions Received)				
26	Hertingfordbury (No Additional Suggestions Received)				
27	High Wych (No Additional Suggestions Received)				
28	Hormead (No Additional Suggestions Received)				
29	Hunsdon (No Additional Suggestions Received)				
30	Little Berkhamstead (No Additional Suggestions Received)				
31	Little Hadham				
31/007	Field behind Foxearth	Chapel Lane	Little Hadham	0.92	Residential
32	Little Munden (No Suggestions Received)				

33	Much Hadham				
33/004	Land south of Ashleys	Widford Road	Much Hadham	0.58	Residential
33/005	Dolan's Field (land north of New Barns Lane)	New Barns Lane	Much Hadham	4.48	Residential
34	Sacombe (No Suggestions Received)				
35	Standon				
35/016	Land at Wickham Hill	Wickham Hill	Puckeridge	8.69	Residential, Community Facility, Leisure/ Recreation
35/017	The Chestnuts & Glanton	Cambridge Road	Puckeridge	0.89	Residential
35/018	Bromley Farm Yard	Bromley Lane	Bromley, Nr Standon	0.33	Residential
35/019	Land adjacent to Arches Hall Cottages	Arches Hall	Latchford, Nr Standon	1.09	Residential
36	Stanstead Abbots				
36/008	Tennis Court, 1 The Abbots, Warrax Park	Cappell Lane	Stanstead Abbots	0.91	Residential
37	Stanstead St Margarets (No Additional Suggestions Received)				
38	Stapleford (No Additional Suggestions Received)				
39	Stocking Pelham (No Suggestions Received)				
40	Tewin				
40/003B	Land east of Upper Green Road	Upper Green Road	Tewin	0.31	Residential
40/007	Land rear of 29 Upper Green Road	Upper Green Road	Tewin	0.91	Residential
41	Thorley				
41/005	Land at Pig Lane	Twyford Bury Lane	Bishop's Stortford	10.91	Residential, Mixed Use
42	Thundridge				
42/010	Land at Oakley Coach Builders	High Road	High Cross	0.57	Employment
42/011	Land at Oakley Coach Builders	High Road	High Cross	1.50	Employment
42/012	Sawtrees Yard	Cold Christmas Lane	Sawtrees, Nr Barwick	0.26	Residential
42/013	Land south of Cold Christmas Lane	Cold Christmas Lane	Cold Christmas	18.44	Residential
42/014	Land south of North Drive	North Drive	High Cross	0.86	Residential
43	Walkern (No Additional Suggestions Received)				
44	Wareside (No Additional Suggestions Received)				
45	Watton-at-Stone				
45/004	Land north of 25 Walkern Road	Walkern Road	Watton-at-Stone	1.08	Residential
46	Westmill (No Additional Suggestions Received)				
47	Widford (No Additional Suggestions Received)				
48	Wyddial (No Suggestions Received)				

AMENDED RESPONSES TO THE CALL FOR SITES PROCESS
(SUGGESTED USE)

Ref:	Site Location	Site Address	Site Settlement	Site Area (Ha)	Suggested Use
01	Bishop's Stortford				
01/010	Bishop's Stortford Football Club	Woodside Park	Bishop's Stortford	2.99	Leisure/ Recreation, Other - Hotel
05	Ware				
05/001	Presdales Pit	Hoe Lane	Ware	11.23	Residential, Affordable Housing, Employment (Resource Recovery Park)

RESPONSES WITHDRAWN FROM THE
CALL FOR SITES PROCESS

Ref:	Site Location	Site Address	Site Settlement	Site Area (Ha)	Suggested Use
05	Ware				
05/006	Ashwood	Dickenson Way	Ware	0.56	Residential
05/012	103 New Road	New Road	Ware	0.12	Residential

ESSENTIAL REFERENCE PAPER 'C'

RESPONSES RECEIVED TO THE CALL FOR SITES

- Please note: the inclusion of a site or particular area of land in the list below is not in any way an endorsement of a particular site for development. The Call for Sites is part of the SLAA evidence gathering process to inform the LDF plan-making process.
- The sites have been suggested by landowners, developers and other interested parties and simply indicate a desire to bring forward a site for development at some point in the future.
- For information, total site areas have been included below although for larger sites especially, the whole site would be unlikely to be developed.
- For ease of reference the sites are listed by town and parish.
- The Call for Sites is separate from the planning application process and neither the Call for Sites nor the SLAA precludes landowners and developers from submitting planning applications for development.
- As such, at this stage, the Council has not and can not make any comment or commitment in respect of any of the sites suggested.

Ref:	Site Location	Site Address	Site Settlement	Site Area (Ha)	Suggested Use
01	Bishop's Stortford				
01/001	Land at Rye Street	Rye Street	Bishop's Stortford	2.89	Residential
01/002	Land to the rear of 165/167 Rye Street	Rye Street	Bishop's Stortford	0.06	Residential
01/003	Woodlands Lodge	Dunmow Road	Bishop's Stortford	0.42	Employment
01/004	Land west of Farnham Road	Farnham Road	Bishop's Stortford	10.41	Residential
01/005	B.J. Ashpole Ltd	Southmill Road	Bishop's Stortford	0.70	Residential
01/006	34 Rye Street	Rye Street	Bishop's Stortford	0.08	Residential
01/007	Land at 9 Dolphin Way	Dolphin Way	Bishop's Stortford	1.25	Residential
01/008	Land at Hoggates End	Whitehall Lane	Bishop's Stortford	1.19	Residential
01/009	Land to the rear of 37-57 Haymeads Lane	Haymeads Lane	Bishop's Stortford	0.46	Residential
01/010	Bishop's Stortford Football Club	Woodside Park	Bishop's Stortford	2.99	Leisure/ Recreation, Other - Hotel
01/011	Thorley Place	Thorley Lane East	Bishop's Stortford	0.56	Residential

01/012	Apton Road Car Park	Apton Road	Bishop's Stortford	0.22	Residential
01/013	Reserve Secondary School Site	Hadham Road	Bishop's Stortford	10.17	Residential
01/014	Land at Bishop's Stortford Golf Club (to the rear of Manor Links)	Manor Links	Bishop's Stortford	2.12	Residential, Affordable Housing
01/015	Farm Shop, Blyth Farm	Gipsy Lane	Bishop's Stortford	0.02	Retail
01/016	Rock Cottage, Blyth Farm	Gipsy Lane	Bishop's Stortford	0.05	Residential
01/017	Land north of Great Hadham Road & east of Monkswood Drive	Great Hadham Road	Bishop's Stortford	3.07	Residential, Affordable Housing, Leisure/ Recreation
01/018	Land south of Maze Green Road	Maze Green Road	Bishop's Stortford	0.14	Residential
01/019	Junior School Site, Bishop's Stortford College	Maze Green Road	Bishop's Stortford	0.99	Other - Education
01/020	Land at Dane O'Coys Road	Dane O'Coys Road	Bishop's Stortford	17.96	Residential, Affordable Housing
01/021	Whitehall Leys	Whitehall Road	Bishop's Stortford	0.98	Residential
01/022	Land north of 221 Rye Street	Rye Street	Bishop's Stortford	1.49	Residential, Affordable Housing
01/023	Land north-east of Farnham Road	Farnham Road	Bishop's Stortford	18.78	Residential
01/024	Bishop's Stortford Areas of Special Restraint No's 1-5, Special Countryside Area and adjoining Green Belt	Land south of A120	Bishop's Stortford	154.05	Mixed Use
01/025	Bishop's Stortford Air Cadet HQ	Knights Row	Bishop's Stortford	0.07	Community Facility
01/026	Reserve Secondary School Site	Hadham Road	Bishop's Stortford	8.74	Residential
01/027	Land adjacent to Bournebrook House	Farnham Road	Bishop's Stortford	0.47	Residential
01/028	Council Offices & land at The Causeway	The Causeway	Bishop's Stortford	1.40	Mixed Use
01/029	Land at Riverside Walk	Riverside Walk	Bishop's Stortford	0.05	Mixed Use
01/030	Land at Hallingbury Road	Hallingbury Road	Bishop's Stortford	0.93	Residential
01/031	Oxford House	London Road	Bishop's Stortford	0.20	Residential
01/032	Bishop's Stortford Delivery Office & Post Office	102 South Street	Bishop's Stortford	0.27	Mixed Use

01/033	Land at Styleman's Farm	Hallingbury Road	Bishop's Stortford	4.68	Residential, Affordable Housing, Leisure/ Recreation, Employment
02	Buntingford				
02/001	Land south of Owles Lane	Owles Lane	Buntingford	12.24	Residential, Affordable Housing, Specialist Residential, Community Facility, Leisure/ Recreation, Retail, Employment, Renewable Energy, Mixed Use
02/002	Land to the rear of Snells Mead	Station Road	Buntingford	18.22	Residential, Leisure/ Recreation
02/003	Land off Longmead	Longmead	Buntingford	1.18	Residential
02/004	Land east of Buntingford (south of the Causeway & north of Hare Street Road)	The Causeway	Buntingford	11.73	Residential, Affordable Housing, Leisure/ Recreation, Other – Open Space, Children's Play Area, Car Parking, Forest Planting
02/005	Land west of Buntingford (between Monks Walk & A10)	Monks Walk	Buntingford	21.25	Residential, Affordable Housing
02/006	Aspenden Bridge (opposite Watermill Industrial Estate)	Aspenden Road	Buntingford	2.78	Residential, Affordable Housing
02/007	Former Sainsbury's Depot	London Road	Buntingford	10.93	Residential
02/008	Land west of London Road	London Road	Buntingford	2.14	Residential
02/009	Land west of Ermine Street	Ermine Street	Buntingford	17.39	Residential, Affordable Housing, Specialist Residential
02/010	Land to the rear of How Green Meadow	Baldock Road	Buntingford	0.27	Residential
02/011	Land at Aspenden Road	Aspenden Road	Buntingford	0.73	Residential

03 Hertford					
03/001	Bengeo Plant Nursery	Sacombe Road	Hertford	1.68	Residential
03/002	National Grid Site/ Norbury Woodyard	Marshgate Drive	Hertford	4.18	Mixed Use
03/003	Land north of Molewood Road	Molewood Road	Hertford	0.47	Residential
03/004	Land east of North Road	North Road	Hertford	3.04	Residential
03/005	Land west of Mangrove Road	Mangrove Road	Hertford	4.87	Residential
03/006	Land adjacent to London Road & Cricket Ground on Mangrove Road	Mangrove Road	Hertford	4.39	Residential
03/007	The Old Orchard	Old Hertingfordbury Road	Hertford	0.29	Residential, Affordable Housing, Specialist Residential
03/008	Hertford Fire Station & Fire Service HQ	Old London Road	Hertford	0.59	Residential
03/009	West Street Allotments	West Street	Hertford	0.45	Residential
03/010	Land west of Thieves Lane & south of Welwyn Road	Thieves Lane	Hertford	11.37	Residential, Renewable Energy
03/011	Dunkirksbury Farm	Mangrove Lane	Hertford	51.85	Residential
03/012	13-19 Castle Mead Gardens	Castle Mead Gardens	Hertford	0.21	Residential
03/013	Land east of East Lodge, Balls Park	London Road	Hertford	0.10	Residential
03/014	Land west of London Road Cottages, Balls Park	London Road	Hertford	0.22	Residential
03/015	Land to the rear of 'Fireflies'	9 The Avenue	Hertford	0.06	Residential
03/016	1-14 Dicker Mill	Dicker Mill	Hertford	0.45	Residential, Affordable Housing
03/017	30-34 and 33-41 Chambers Street	Chambers Street	Hertford	0.24	Residential, Affordable Housing
03/018	Former McMullen Brewery	Hartham Lane	Hertford	2.35	Retail
03/019	Goldings Manor	Waterford	Hertford	40.47	Residential, Affordable Housing, Specialist Residential, Community Facility, Leisure/ Recreation, Employment, Mixed Use

03/020	Land at Braziers Field	Braziers Field	Hertford	0.59	Residential
03/021	Goldings, Orchard House	Broad Oak End	Hertford	1.37	Residential
03/022	Chelmsford Lodge	Valeside	Hertford	1.54	Residential, Affordable Housing, Specialist Residential
03/023	Land south of 145 North Road	North Road	Hertford	0.05	Residential
03/024	Hertford Delivery Office	Greencoates	Hertford	0.42	Residential
03/025	Land west of Mangrove Road	Mangrove Road	Hertford	2.76	Residential
04 Sawbridgeworth					
04/001	Land at 'The Colt'	Redricks Lane	Sawbridgeworth	2.51	Residential
04/002	Biss Brothers Old Site	Land north of 'The Dell'	Spellbrook	0.28	Residential
04/003	Land to the rear of 4 Newports	High Wych Road	Sawbridgeworth	0.21	Residential
04/004	Land adjacent to east edge of Rowney Wood	Chaseways	Sawbridgeworth	4.08	Affordable Housing
04/005	Land at Thomas Rivers Hospital	High Wych Road	Sawbridgeworth	27.90	Other - Health
04/006	Land at Chalk's Farm (south of West Road)	West Road	Sawbridgeworth	14.19	Residential
04/007	Land west of Sawbridgeworth		Sawbridgeworth	108.84	Residential
04/008	Land at Northfield House	Cambridge Road	Sawbridgeworth	1.04	Residential, Affordable Housing
04/009	Land north of Chaseways	Chaseways	Sawbridgeworth	8.79	Residential
04/010	Land adjacent to Primrose Cottage	High Wych Road	Sawbridgeworth	1.00	Residential, Affordable Housing
04/011	The Piggeries (land south & west of the Coach House)	Redricks Lane	Sawbridgeworth	4.05	Residential
04/012	The Bungalow and land to the east	Three Mile Pond Farm	Sawbridgeworth	5.29	Residential, Affordable Housing
04/013	Brickwell Fields (land north of West Road)	West Road	Sawbridgeworth	5.93	Residential
04/014	Land south of Bridgefoot House	Station Road	Sawbridgeworth	0.73	Residential
04/015	Land west of the River Stort and south of Station Road	Station Road	Sawbridgeworth	2.99	Residential, Affordable Housing
04/016	Land adjacent to Cambridge Road	Cambridge Road	Sawbridgeworth	?	Residential

04/017	Land north & south of Spellbrook Lane West	Spellbrook Lane West	Spellbrook	11.21	Residential, Affordable Housing, Employment
04/018	Land at Thomas Rivers Nursery	High Wych Road	Sawbridgeworth	27.90	Community Facility
05	Ware				
05/001	Presdales Pit	Hoe Lane	Ware	11.23	Residential, Affordable Housing, Employment (Resource Recovery Park)
05/002	Leaside Depot	Widbury Hill	Ware	1.97	Mixed Use
05/003	Nuns' Triangle (land bound by A10/ A1170/ Quincey Road)		Ware	10.65	Residential
05/004	Land south of Fanhams Hall Road and east of the Trinity Centre	Fanhams Hall Road	Ware	5.20	Residential
05/005	Horticultural Nursery, Presdales School	Hoe Lane	Ware	1.12	Residential
05/006	SITE WITHDRAWN				
05/007	Baldock Street Car Park	Coronation Road	Ware	0.23	Residential
05/008	Old Hertfordians Rugby Club	Hoe Lane	Ware	2.27	Residential
05/009	Land east of the Trinity Centre	Lady Margaret Gardens	Ware	2.8	Residential, Affordable Housing
05/010	Ware Library & The Old Fire Station	High Street	Ware	0.07	Residential, Community Facility
05/011	2B Star Street	Star Street	Ware	0.05	Residential
05/012	SITE WITHDRAWN				
05/013	Land at Rush Green	Hoe Lane	Ware	14.61	Residential
05/014	Land at Crane Mead	Crane Mead	Ware	1.66	Residential
05/015	Swain Mill	Crane Mead	Ware	0.40	Residential, Specialist Residential, Leisure/ Recreation, Retail, Mixed Use
05/016	Land at Chadwell Springs Golf Course	Hertford Road	Ware	4.27	Leisure/ Recreation
05/017	Land at Little Acres	Little Acres	Ware	2.16	Residential
05/018	Cintel Site	Watton Road	Ware	2.14	Retail, Mixed Use
05/019	Hale Club	Hoe Lane	Ware	3.85	Residential

05/020	Land east of Ware (to the rear of Cozens Road)		Ware	11.75	Residential, Affordable Housing
05/021	Land at King George Road	King George Road	Ware	0.10	Residential
05/022	Swains Mill & land south of Crane Mead (Starstage site)	Crane Mead	Ware	0.82	Residential, Affordable Housing
06	Albury				
06/001	Bride Croft (land south of Upwick Green Road)	Upwick Green Road	Upwick, Nr Albury	6.25	Residential
06/002	Salmon Mead (land east of Tatts Cottage; now known as The Nook)	Upwick Green Road	Upwick, Nr Albury	0.96	Residential
07	Anstey				
07/001	Land south-east of Anstey village school	Anstey Road	Anstey	0.52	Residential, Affordable Housing
07/002	Silkmead Farm	B1368	Hare Street	2.70	Residential
08	Ardeley				
08/001	Kingswick	White Hill	Cromer	0.19	Residential
09	Aspenden				
09/001	Land north of Buntingford Business Park	Baldock Road	Buntingford	2.80	Retail, Employment, Renewable Energy, Mixed Use
10	Aston				
10/001	Palletts Orchard	Stringers Lane	Aston	0.44	Residential, Affordable Housing
10/002	Coppers Field	Aston End Road	Aston	3.04	Residential
10/003	Little Orchard	Dene Lane	Aston	0.48	Residential
10/004	Lammas Cut	Dene Lane	Aston	0.29	Residential
11	Bayford				
11/001	Land to the rear of 4-6 Ashendene Road	Ashendene Road	Bayford	0.18	Residential
12	Bengeo Rural				
12/001	Land at High Trees Farm		Chapmore End	22.05	Residential
12/002	Land at Bourne Honour	Bourne Honour	Tonwell	0.41	Residential
13	Benington				
13/001	Land west and north of Oak Tree Surgery	Oak Tree Close	Benington	1.73	Residential
13/002	Land west of 22 Burns Green	Burns Green	Benington	0.31	Residential
13/003	Land west of 90 Town Lane	Town Lane	Benington	0.34	Residential
13/004	Land south of 2A Whempstead Road	Whempstead Road	Benington	0.36	Residential

13/005	Land east of 25 Hebing End	Hebing End	Benington	0.14	Residential
13/006	Land north of 68 Whempstead Road	Whempstead Road	Benington	0.83	Residential
13/007	Old School	Old School Green	Benington	0.05	Residential
13/008	Land at the Old Chalk Pit	Church Green	Benington	0.33	Residential
13/009	Whitehall Stables, Whitehall Farm	Walkern Road	Watton-at-Stone	0.17	Residential
13/010	Land north of High Elms Lane	High Elms Lane	Watton-at-Stone	0.74	Residential
13/011	Land adjacent to Frogmore Lodge	Walkern Road	Watton-at-Stone	0.17	Residential
13/012	Holbrook Barns	Benington Road	Benington	0.22	Residential
13/013	Land adjacent to The Bell PH	Town Lane	Benington	0.77	Residential
14	Bramfield (No Suggestions Received)				
15	Braughing				
15/001	Arden Meadow	Friars Road	Braughing	1.71	Residential
15/002	Land east of B1368, Quinbury Farm	Hay Street	Braughing	0.83	Residential
15/003	Land off Green End & Gravelly Lane	Gravelly Lane	Braughing	1.61	Residential
15/004	Land off Green End	Green End	Braughing	6.69	Leisure/ Recreation
15/005	Land north of 21 Green End	Green End	Braughing	0.73	Residential, Affordable Housing
15/006	Open land in and surrounding the village of Braughing		Braughing	67.52	Other – Open/ Green Space
15/007	Land to the rear of the Chesnuts	Hull Lane	Braughing	0.33	Residential
16	Brent Pelham & Meesden				
16/001	Land adjacent to Pumphill Cottage	Pumphill	Brent Pelham	0.31	Residential, Affordable Housing
17	Brickendon Liberty				
17/001	Birch Farm	White Stubbs Lane	Broxbourne	1.08	Residential
17/002	Land west of Brickendon Lane	Brickendon Lane	Hertford	24.81	Residential, Affordable Housing, Specialist Residential, Community Facility, Leisure/ Recreation, Employment, Mixed Use
17/003	Land at Brickendon Grange	Pembridge Lane	Brickendon	0.17	Residential
18	Buckland (No Suggestions Received)				

19	Cottered				
19/001	Trinity Meadow, Thirty Acre Farm	Broadfield	Throcking	2.17	Residential
19/002	Land to the rear of Peasecroft & The Crescent	Peasecroft & The Crescent	Cottered	12.90	Residential
19/003	The Paddock	Warren Lane	Cottered	0.45	Residential
20	Datchworth				
20/001	Home Farm	76 Bramfield Road	Bulls Green	0.47	Residential
20/002	Pound Farm	Hollybush Lane	Datchworth	0.78	Residential
20/003	Land between 67 & 75 Burnham Green Road	Burnham Green Road	Burnham Green	1.31	Residential
21	Eastwick & Gilston				
21/001	Fiddlers Brook Stables	Church Lane	Gilston	2.28	Unspecified
21/002	Redricks, Hollingson Meads, Sayes Park, Gilston Park (part)	Marlers, Pye Corner	Gilston	135.83	Residential, Affordable Housing, Specialist Residential, Community Facility, Leisure/ Recreation, Retail, Employment, Renewable Energy, Mixed Use
21/003	Terlings Park	Eastwick Road	Eastwick	12.08	Residential
21/004	Land north of A414/ Eastwick Road		Eastwick	1012.03	Residential, Affordable Housing, Specialist Residential, Community Facility, Leisure/ Recreation, Retail, Employment, Renewable Energy, Mixed Use
21/005	Land adjacent and to the rear of The Dusty Miller PH	Burnt Mill Lane	Eastwick	0.81	Residential, Employment
21/006	Land south of Gilston Park House	Gilston Park	Gilston	7.99	Residential
21/007	Terlings Park and the Gravel Pits to the west of Redricks Lane	Redricks Lane	Gilston	?	Residential, Affordable Housing, Mixed Use

21/008	Gilston Great Park (land to the north of Harlow)		Eastwick & Gilston	2500	Residential, Affordable Housing, Community Facility, Leisure/ Recreation, Employment, Renewable Energy, Mixed Use
21/009	Land south of Eastwick Road & Redricks Lane	Redricks Lane	Gilston	112.97	Residential, Affordable Housing, Community Facility, Leisure/ Recreation, Retail, Renewable Energy
22	Furneux Pelham				
22/001	Land north of Lake Villas	Barleycroft End	Furneux Pelham	0.31	Residential
22/002	Hollybush	The Street	Furneux Pelham	0.25	Residential
22/003	Land at Violets Lane	Barleycroft End	Furneux Pelham	0.37	Residential
22/004	Land at Tinkers Hill	The Street	Furneux Pelham	0.23	Residential
23	Great Amwell				
23/001	Land to the rear of The Brooms	Lower Road	Great Amwell	0.65	Residential, Affordable Housing
23/002	Byfield Nursery	Gipsy Lane	Great Amwell	2.05	Residential
23/003	Land north of Jansus	Amwell Lane	Stanstead Abbots	0.23	Residential
23/004	Land surrounding Van Hages Garden Centre	Amwell Hill	Great Amwell	39.37	Residential, Affordable Housing
24	Great Munden (No Suggestions Received)				
25	Hertford Heath				
25/001	Land west of London Road (opposite no's 87-119)	London Road	Hertford Heath	5.44	Residential, Affordable Housing
25/002	Land at Amwell Place Farm (east & west of Downfield Road	Downfield Road	Hertford Heath	70.38	Residential
25/003	The Roundings and land to the rear	The Roundings	Hertford Heath	1.70	Residential, Affordable Housing

26 Hertingfordbury					
26/001	Water Hall Quarry Complex	Lower Hatfield Road	Little Berkhamsted	128.09	Gypsies & Travellers, Travelling Showpeople, Community Facility, Leisure/ Recreation, Employment, Renewable Energy, Mixed Use, Other
26/002	Joseph Rochford Gardens Ltd	1 Pipers End	Letty Green	10.83	Residential
26/003	Birchall Farm (land north of Birchall Lane)	Birchall Lane	Cole Green	70.88	Residential
26/004	Hatfield Estate (land surrounding Munn's Farm)	Munn's Farm	Cole Green	126.80	Unspecified
26/005	New England Nursery		Birch Green	0.69	Residential
27 High Wych					
27/001	Builders Yard	High Wych Lane	High Wych	0.28	Residential
27/002	Sayes Park Farm	High Wych Road	High Wych	169.42	Residential
27/003	Land surrounding High Wych Grange	High Wych Road	High Wych	6.79	Residential
28 Hormead					
28/001	Field 2769 (land south of B1038)	B1038	Hare Street	0.89	Leisure/ Recreation
28/002	Land to rear and east of Hormead C of E Primary School	B1038	Great Hormead	3.62	Residential, Affordable Housing
28/003	Land west of Hormead Village Hall	B1038	Great Hormead	0.89	Residential, Affordable Housing
28/004	Land to rear of Jubilee Cottages	Horseshoe Lane	Great Hormead	1.28	Residential, Affordable Housing
29 Hunsdon					
29/001	Land west of Little Samuel's Farm	Widford Road	Hunsdon	28.85	Residential
29/002	Land north of Little Samuel's Farm	Widford Road	Hunsdon	1.07	Residential
29/003	Little Samuel's Farm Estate	49 Widford Road	Hunsdon	1.14	Residential
29/004	Eastern part of Briggens Estate (land east & west of Eastwick Road)	Eastwick Road	Hunsdon	114.05	Residential
29/005	Land south of Drury Lane & east of allotments	Drury Lane	Hunsdon	0.67	Residential, Affordable Housing

29/006	Land south of Tanners Way	Tanners Way	Hunsdon	0.33	Residential, Affordable Housing
29/007	Land north of 50 Widford Road	Widford Road	Hunsdon	0.05	Residential
30	Little Berkhamsted				
30/001	Brookside and the old gravel pit	Lower Hatfield Road	Little Berkhamsted	5.67	Residential, Mixed Use
31	Little Hadham				
31/001	Field 5155, Stone House Farm (land south of Stortford Road)	Stortford Road	Little Hadham	0.66	Residential
31/002	Land & buildings at Little Hadham	Church End Farm	Little Hadham	268.15	Residential, Community Facility, Leisure/ Recreation, Retail, Employment, Renewable Energy, Mixed Use, Other – Health, A120 bypass
31/003	Land at Bury Green Farm	Millfield Lane	Bury Green	3.34	Residential, Affordable Housing
31/004	Land to rear of Florence Cottage	The Ford	Little Hadham	0.24	Residential
31/005	Paddock adjacent to Barrans		Bury Green	0.41	Residential
31/006	Land east of Ashcroft Farm	Stortford Road	Little Hadham	0.66	Residential
31/007	Field behind Foxearth	Chapel Lane	Little Hadham	0.92	Residential
32	Little Munden (No Suggestions Received)				
33	Much Hadham				
33/001	Land west of Hodge's Garage	Victoria Terrace	Much Hadham	0.78	Residential
33/002	Land at Walnut Close	Walnut Close	Much Hadham	0.23	Residential
33/003	Land between 2-3 Poplar Cottages	Windmill Way	Much Hadham	0.05	Residential
33/004	Land south of Ashleys	Widford Road	Much Hadham	0.58	Residential
33/005	Dolan's Field (land north of New Barns Lane)	New Barns Lane	Much Hadham	4.48	Residential
34	Sacombe (No Suggestions Received)				
35	Standon				
35/001	A10 Timber Company	Gore Lane	Barwick Ford	1.73	Employment
35/002	Burrs Meadow	High Street	Standon	0.47	Residential
35/003	Lilymead	Mill End	Standon	0.46	Residential
35/004	Café Field (land north of A120)	Standon Hill	Puckeridge	11.20	Residential

35/005	Land to rear of Lamb & Flag PH	Ermine Street	Colliers End	2.92	Residential
35/006	Land at Half Acres	Stortford Road	Standon	0.02	Residential
35/007	Land south of Dowsetts Lane	Dowsetts Lane	Colliers End	5.77	Residential
35/008	Land north of St Mary's Church	Ermine Street	Colliers End	0.50	Residential, Specialist Residential
35/009	Land west of Buntingford Road & north of Mentley Lane East	Buntingford Road	Puckeridge	1.55	Residential
35/010	Land east of Station Road	Station Road	Standon	1.18	Employment
35/011	Hopson Site (land bounded by the A120, River Rib & the dismantled railway)	Stortford Road	Standon	0.93	Employment
35/012	Land north of Barnacres	Ermine Street	Colliers End	0.05	Residential
35/013	Camps Field	Ermine Street	Colliers End	5.62	Residential
35/014	Slaughterhouse/ Orchard	Ermine Street	Colliers End	0.24	Residential
35/015	Ryders Mead	Ermine Street	Colliers End	1.84	Residential
35/016	Land at Wickham Hill	Wickham Hill	Puckeridge	8.69	Residential, Community Facility, Leisure/ Recreation
35/017	The Chestnuts & Glanton	Cambridge Road	Puckeridge	0.89	Residential
35/018	Bromley Farm Yard	Bromley Lane	Bromley, Nr Standon	0.33	Residential
35/019	Land west of Arches Hall Cottages	Morley Lane	Latchford, Nr Standon	1.09	Residential
36	Stanstead Abbots				
36/001	Kitten Hill (land east of Hunsdon Road & north of Roydon Road)	Kitten Lane	Stanstead Abbots	3.36	Residential
36/002	Land north of Marsh Lane	Marsh Lane	Stanstead Abbots	1.31	Residential, Affordable Housing
36/003	Land north of Marsh Lane (adjacent to the Mill Stream)	Marsh Lane	Stanstead Abbots	0.22	Leisure/ Recreation
36/004	Land at French & Jupps	The Maltings	Stanstead Abbots	0.28	Other – Parking
36/005	The Old Windmill	Glenmire Terrace	Stanstead Abbots	0.02	Residential
36/006	David Websters	Netherfield Lane	Stanstead Abbots	1.34	Employment
36/007	Land off Netherfield Lane (north of David Websters)	Netherfield Lane	Stanstead Abbots	1.35	Residential

36/008	Tennis Court, 1 The Abbots, Warrax Park	Cappell Lane	Stanstead Abbotts	0.91	Residential
37	Stanstead St Margarets				
37/001	Land at Stanstead St Margarets (land north & south of A414)	A414	Stanstead St Margarets	45.65	Residential
37/002	Land west of Ware Road, Springle House	Springle Lane	Hailey	17.98	Residential
37/003	The Wilderness (land between Hoddesdon Road & the New River)	Hoddesdon Road	Stanstead St Margarets	0.48	Residential
37/004	Hillside Nursery	Ware Road	Hailey	1.88	Residential, Affordable Housing
38	Stapleford				
38/001	Little Gobions	Gobions Lane	Stapleford	0.31	Residential
38/002	Hubbards	Gobions Lane	Stapleford	0.43	Residential
39	Stocking Pelham (No Suggestions Received)				
40	Tewin				
40/001	Land adjacent to Cowper C of E School	Cannons Meadow	Tewin	1.49	Residential, Affordable Housing
40/002	Seven Acres	49 Upper Green Road	Tewin	1.97	Residential
40/003A	Land east of Upper Green Road	Upper Green Road	Tewin	1.00	Residential
40/003B	Land east of Upper Green Road	Upper Green Road	Tewin	0.31	Residential
40/004	Land at junction of Upper Green Road & Tewin Hill	Upper Green Road	Tewin	2.23	Residential
40/005	Land rear of 8 Tewin Hill Cottages	Tewin Hill	Tewin	0.04	Residential
40/006	Land north of 16 Grass Warren	Grass Warren	Tewin	0.09	Residential
40/007	Land rear of 29 Upper Green Road	Upper Green Road	Tewin	0.91	Residential
41	Thorley				
41/001	Land north of Twyford Bury	Twyford Lane	Bishop's Stortford	0.44	Residential
41/002	Land south of Whittington Way	Whittington Way	Bishop's Stortford	53.14	Residential
41/003	Thorley Wash Grange	London Road	Bishop's Stortford	0.48	Residential
41/004	Land south of Whittington Way	Whittington Way	Bishop's Stortford	53.14	Residential
41/005	Land at Pig Lane	Twyford Bury Lane	Bishop's Stortford	10.91	Residential, Mixed Use
42	Thundridge				
42/001	The Football Pitches (land south of Dane End Road)	Dane End Road	High Cross	8.50	Residential
42/002	Land rear of Rennesley Farm	Anchor Lane	Wadesmill	0.97	Residential, Affordable Housing

42/003	Land east of Cambridge Road	Cambridge Road	Wadesmill	1.25	Residential, Affordable Housing
42/004	Land rear of Puller Memorial JMI School	High Road	High Cross	1.09	Residential, Affordable Housing
42/005	Land south of Cold Christmas Lane	Cold Christmas Lane	Thundridge	1.13	Residential, Affordable Housing
42/006	Sutes Farm	High Road	High Cross	1.47	Employment
42/007	Land north of 24 Cambridge Cottages	High Road	High Cross	0.19	Residential, Affordable Housing
42/008	Land to rear of Cambridge Cottages	High Road	High Cross	1.15	Residential, Affordable Housing
42/009	Land north of North Drive	North Drive	High Cross	0.70	Residential
42/010	Land at Oakley Coach Builders	High Road	High Cross	0.57	Employment
42/011	Land at Oakley Coach Builders	High Road	High Cross	1.50	Employment
42/012	Sawtrees Yard	Cold Christmas Lane	Sawtrees, Nr Barwick	0.26	Residential
42/013	Land south of Cold Christmas Lane	Cold Christmas Lane	Cold Christmas	18.44	Residential
42/014	Land south of North Drive	North Drive	High Cross	0.86	Residential
43 Walkern					
43/001	SITE REFERENCE AMENDED TO 08/001				
43/002	Land to the north-east of Stevenage, Boxbury Farm & Walkern & Chells Farm		Walkern/ Stevenage	247.42	Residential, Affordable Housing, Specialist Residential, Community Facility, Leisure/ Recreation, Retail, Employment, Renewable Energy, Mixed Use, Other
43/003	Chells Field (land south of Stevenage Road & east of Gresley Way)	Stevenage Road	Walkern/ Stevenage	9.82	Residential (see 43/002)
43/004	Land to rear of The White Lion PH	High Street	Walkern	0.54	Residential
43/005	Land to rear of 6-7 Clay End Road	Clay End Road	Clay End, Nr Walkern	0.13	Residential
43/006	Land to the east of Clay End Road	Clay End Road	Clay End, Nr Walkern	0.16	Residential
43/007	Land to rear of 5 Clay End Road	Clay End Road	Clay End, Nr Walkern	0.20	Residential

43/008	Land adjacent to 1 Clay End Road	Clay End Road	Clay End, Nr Walkern	0.18	Residential
43/009A	Land to the rear of 19-39 Aubries	Aubries	Walkern	0.93	Residential, Affordable Housing
43/009B	Land to the rear of 19-39 Aubries	Aubries	Walkern	1.88	Residential, Affordable Housing
43/010	Land adjacent to Granary Cottage	High Street	Walkern	0.34	Residential
43/011	Land north of Manor View	High Street	Walkern	0.12	Residential
44	Wareside				
44/001A	Land north of Ware (land to rear of Heath Drive)	High Oak Road	Ware	7.19	Residential
44/001B	Land north of Ware (land bound by Wodson Park to west, High Oak Road & Fanhams Hall Road to south & the Round House to north)		Ware	39.43	Residential
44/002	Appleton Farmyard, Appleton Farm	Babbs Green	Wareside	0.28	Residential
44/003	Land south of St Georges Cottages	Babbs Green	Wareside	0.18	Residential
44/004	Land adjacent to Appleton Farm	Babbs Green	Wareside	0.69	Residential
44/005	Land to the north and east of Ware		Ware	99.18	Residential, Affordable Housing, Community Facility, Leisure/ Recreation, Retail, Employment
45	Watton-at-Stone				
45/001	Watton-at-Stone Depot	Station Road	Watton-at-Stone	0.39	Residential
45/002	Land and buildings at Perrywood Lane	Perrywood Lane	Watton-at-Stone	0.71	Residential, Affordable Housing
45/003	Land at 22 Great Innings North	Great Innings North	Watton-at-Stone	0.11	Residential
45/004	Land north of 25 Walkern Road	Walkern Road	Watton-at-Stone	1.08	Residential
46	Westmill				
46/001	Land south of Cherry Green Lane (between Pantiles and Gaynors Farm	Cherry Green Lane	Westmill	0.60	Residential
46/002	Land to rear of School Cottages		Westmill	0.06	Residential, Affordable Housing, Specialist Residential

47	Widford				
47/001	Adams Farm	Hunsdon Road	Widford	0.53	Residential
47/002	Land to rear of Adams Farm	Hunsdon Road	Widford	1.66	Residential
48	Wyddial (No Suggestions Received)				

RESPONSES WITHDRAWN FROM THE
CALL FOR SITES PROCESS

Ref:	Site Location	Site Address	Site Settlement	Site Area (Ha)	Suggested Use
05	Ware				
05/006	Ashwood	Dickenson Way	Ware	0.56	Residential
05/012	103 New Road	New Road	Ware	0.12	Residential

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EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL – 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

EAST HERTS GREEN INFRASTRUCTURE PLAN (MARCH 2011) AND HERTFORDSHIRE STRATEGIC GREEN INFRASTRUCTURE PLAN (MARCH 2011)

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents for consideration and agreement the East Herts Green Infrastructure Plan and Hertfordshire Strategic Green Infrastructure Plan by Land Use Consultants.

<u>RECOMMENDATION TO EXECUTIVE: to commend to Council that:</u>	
(A)	The East Herts Green Infrastructure Plan (March 2011) and the Hertfordshire Strategic Green Infrastructure Plan (March 2011) be agreed and published:
(i)	as a technical study, forming part of the evidence base to inform and support the East Herts Local Development Framework;
(ii)	as a basis for informing future Development Control decisions concerning development and green infrastructure; and
(iii)	as a basis for green infrastructure planning in the District.

1.0 Background

- 1.1 Green Infrastructure is described in Planning Policy Statement 12: Local Spatial Planning, as “*a network of multifunctional green space...both new and existing...both rural and urban...which*

*supports the natural and ecological processes...and is integral to the health and quality of life of sustainable communities...” This definition is reinforced and expanded in *Green Infrastructure in Hertfordshire: A Framework* and in Natural England’s *Green Infrastructure Guidance*.*

- 1.2 Working on behalf of a network of stakeholders, in particular Hertfordshire Borough and District Councils, Natural England, Environment Agency, Forestry Authority and the Herts and Middlesex Wildlife Trust, Hertfordshire County Council commissioned Land Use Consultants to develop Strategic Green Infrastructure Plans for the county and the wider GreenArc area. ‘Local level’ Green Infrastructure Plans (GIPs) have also been developed for seven districts (Dacorum, East Herts, Hertsmere, St. Albans, Three Rivers, Watford and Welwyn Hatfield). Account has also been taken of existing GIPs to ensure links across boundaries, such as with North Herts.

2.0 Report

- 2.1 The East Herts GIP is a high level plan which identifies further technical and project work which will be needed in the future to deliver green infrastructure. As such the GIP for East Herts:

- Provides an overview of existing green infrastructure assets within the district;
- Sets out an assessment of the ability of green infrastructure to provide multiple environmental, social and in some cases economic functions;
- Considers opportunities for enhancement and creation of green infrastructure;
- Outlines a series of potential projects to deliver multiple functions and benefits; and
- Provides advice on taking green infrastructure proposals forward through spatial planning and practical delivery.

- 2.2 The Strategic Green Infrastructure Plan for Hertfordshire relates to GI assets and proposals which affect multiple districts. In addition to the above, the Hertfordshire Strategic GIP:

- Provides an overview of existing green infrastructure assets within the County, including consideration of assets and proposals which are significant for national and sub-national/regional green infrastructure planning; and,

- Sets out an assessment, at the strategic level, of the ability of green infrastructure to provide multiple environmental and social and in some cases economic functions.
- 2.3 The production of the reports has been informed by a variety of stakeholder events held for each district and for the Hertfordshire Strategic Plan. Both the East Herts and Strategic events were very well attended by a wide variety of interested parties including the Herts and Middlesex Wildlife Trust, Hertfordshire Biological Records Centre, Environment Agency, Natural England and British Waterways among other industry experts.
- 2.4 The East Herts GIP (**Essential Reference Paper ‘B’**) consists of four sections with Section 1 introducing the project and explaining what green infrastructure is and the importance of managing these assets through the planning process. Section 2 explains in detail how the District’s GI assets have been mapped and assessed based on particular functions of GI, such as contributing to health and wellbeing, conserving historic landscape character, land remediation, flood attenuation and water management for example. Each assessment is supported by further evidence contained in an appendix document which consists of larger maps, detailed evidence and references (**Essential Background Paper ‘C’**).
- 2.5 Section 3 of the report takes the assessment stage through into a bespoke vision, five action zones based on key habitat enhancement schemes defined for the wider GI network and a list of recommended GI projects for East Herts, with an indication of costs and steps required to deliver. This list of projects does not preclude others from coming forward at a later date, but the six detailed are considered of sufficient scale and importance to the East Herts and wider GI network to be given priority. They include:
1. Hertford and Ware Wetland Enhancements
 2. Stort Valley and Countryside Links
 3. River Valleys Project – Lee, Stort, Rib, Beane, Quin and Ash
 4. Lateral Links – Green Link between Bishop’s Stortford and Stevenage
 5. Panshanger Park and Mimram Valley Greenspace
 6. Green Hertfordshire
- 2.6 Section 4 of the report addresses issues of delivery in terms of progressing the findings of the report into spatial planning and

development management/development control policies. A process diagram is included which details the way the reports should be used in practice, which could be provided to developers, stakeholders and officers. This section also details specific actions that should be taken to embed the importance of green infrastructure into all aspects of the local authority's responsibilities. One of these actions is to nominate a green infrastructure 'Champion', ideally a Council Member, to ensure greater 'buy-in' from Members and to actively promote GI.

- 2.7 Potential future work could also include producing a GI checklist for development management decisions, a GI Design and Delivery Guide or a GI Supplementary Planning Document and more detailed site-specific GI project work.
- 2.8 It is the intention that the East Herts GIP and Hertfordshire Strategic Plan, along with the suite of district and GreenArc reports and appendices prepared by Land Use Consultants, will become a key part of the evidence base informing the development of the Core Strategy, Site Allocations and Development Management documents along with informing decisions on planning applications.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

An electronic copy of the reports are available online at www.eastherts.gov.uk/gip

- *ERP 'B': East Herts Green Infrastructure Plan – Final Report, March 2011, Land Use Consultants*
- *ERP 'C': East Herts Green Infrastructure Plan – Appendices*

- *Hertfordshire Strategic Green Infrastructure Plan – Final Report, March 2011, Land Use Consultants*
- *Hertfordshire Strategic Green Infrastructure Plan – Appendices*

Hard copies can be made available for Members to borrow on request from the Planning Policy Team.

Public inspection copies are available at reception at the Council Offices in Hertford and Bishop's Stortford.

Contact Member: Councillor M G Carver, Executive Member for Planning Policy and Economic Development

Contact Officer: Kevin Steptoe, Head of Planning and Building Control - Ext 1407

Report Author: Jenny Pierce, Senior Planning Policy Officer

ESSENTIAL REFERENCE PAPER 'A'

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>Pride in East Herts <i>Improve standards of the built neighbourhood and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
Consultation:	In order to ensure the GI plans had 'buy-in' from landowners, stakeholders and providers a series of consultation events were held.
Legal:	It is a statutory duty under the Planning and Compulsory Purchase Act 2004 for East Herts Council as the local planning authority to produce and keep up-to-date sound and robust Development Plan for the district. The Green Infrastructure Plan forms part of the evidence base used to ensure the Core Strategy and other planning documents are justifiable and deliverable.
Financial:	There will be on-going costs associated with the recommended projects and future technical work if this is undertaken. It is intended that the majority of project work would be achieved through developer contributions and partnership working with the Herts and Middlesex Wildlife Trust among others. Other sources of potential future funding include Central Government, Lottery and European funding.
Human Resource:	Depending on how the GIP is taken forward there could be staffing implications in terms of providing a central resource for GI project management and promotion.
Risk Management:	Failure to proceed with the recommended actions and projects contained in the GIP reports could result in the gradual loss of or decline in quality of the district's GI assets resulting in a reduced quality of life for both people and wildlife, a loss of key habitats and wildlife corridors. GI assets also mitigate against the implications of climate change, including extreme weather conditions such as drought and flood.

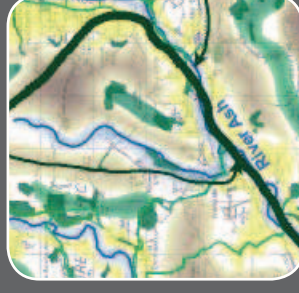
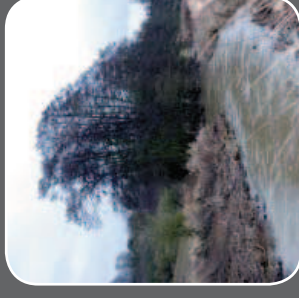
	<p>In order to be found sound the Core Strategy and other planning documents should be based on technical evidence and the views of the community and stakeholders. There is widespread support for raising the profile of green infrastructure. To not take the reports into account in the production of key planning documents could lead to challenges that they are unsound.</p>
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EAST HERTS GREEN INFRASTRUCTURE PLAN - FINAL REPORT

Prepared for East Herts Council
by
Land Use Consultants

March 2011



LUC SERVICES

Environmental Planning

Landscape Design

Landscape Management

Masterplanning

Landscape Planning

Ecology

Environmental Assessment

Rural Futures

Digital Design

Urban Regeneration

Urban Design

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DOCUMENT CONTROL SHEET

Version	Issued by:	Approved by:
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	Senior Landscape Architect	Principal-in-Charge
	30 th March 2011	30 th March 2011

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Acknowledgements:

The production of this Green Infrastructure Plan represents an important milestone in work developed over several years by a wider partnership of Hertfordshire stakeholders, guided throughout by Rob Rees, Hertfordshire County Council. This Green Infrastructure Plan was developed by Land Use Consultants with a steering group comprising of Bryan Thomsett, Jenny Pierce and Paul Stevens (East Herts Council), supported by Simon Odell (Hertfordshire GI Plans Contract Manager, based at Hertfordshire County Council/ Hertfordshire Biological Records Centre). In addition consultation was undertaken with a range of stakeholders as the plan developed, and their contribution is gratefully acknowledged. The views in this GI Plan are those of Land Use Consultants.

Land Use Consultants team comprised: Kate Ahern (Principal), Andrew Tempamy (Project Manager), Alex Massey, Emma Deen, Fearghus Foyle, Graham Savage, Sofie Swindlehurst, Matthew Parkhill and Diana Manson.

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1 Introduction

- 1.1 Green infrastructure (GI) is increasingly recognised as a cornerstone of sustainable development and communities. It is a 'must have', due to the many social, environmental and economic benefits it offers.
- 1.2 Green infrastructure planning and delivery completes Hertfordshire's consideration of sustainable land use and landscape planning, expressed in **Green Infrastructure in Hertfordshire: A Framework**¹. It helps bridge the gap between strategic planning and site design and management, providing messages to inform spatial land planning and development management decisions.
- 1.3 Working on behalf of a network of stakeholders, in particular members of the Hertfordshire Technical Chief Officers Association (HTCOA), Natural England, Environment Agency, Forestry Commission and the Herts & Middlesex Wildlife Trust (HMWT), Land Use Consultants (LUC) was commissioned by Hertfordshire County Council in September 2010 to develop the Hertfordshire GI Plans. This encompassed a county wide strategic Green Infrastructure Plan for Hertfordshire/the Green Arc and 'local level' district Green Infrastructure Plans for seven Hertfordshire districts. The East Herts Green Infrastructure Plan has been developed in parallel with the strategic county wide plan and with those for Watford, Dacorum, Three Rivers, Hertsmeire, Welwyn Hatfield and St Albans. Account has also been taken of

- existing GI plans to ensure links across boundaries, with the strategic GI Plan also considering existing GI work in Hertfordshire, such as the North Hertfordshire District Green Infrastructure Plan.
- 1.4 This is a high level Green Infrastructure Plan, which identifies further work which will be needed in future to deliver green infrastructure. Where further, more detailed green infrastructure planning work will be required, this is also referenced.
- 1.5 The Green Infrastructure Plan for East Herts:
- Provides an overview of existing green infrastructure assets within the District;
 - Sets out an assessment of the ability of green infrastructure to provide multiple environmental and social and in some cases economic functions;
 - Considers opportunities for enhancement and creation of green infrastructure;
 - Outlines a series of potential projects to deliver multiple functions and benefits, and
 - Provides advice on taking green infrastructure proposals forward through spatial planning and practical delivery.

What is green infrastructure?

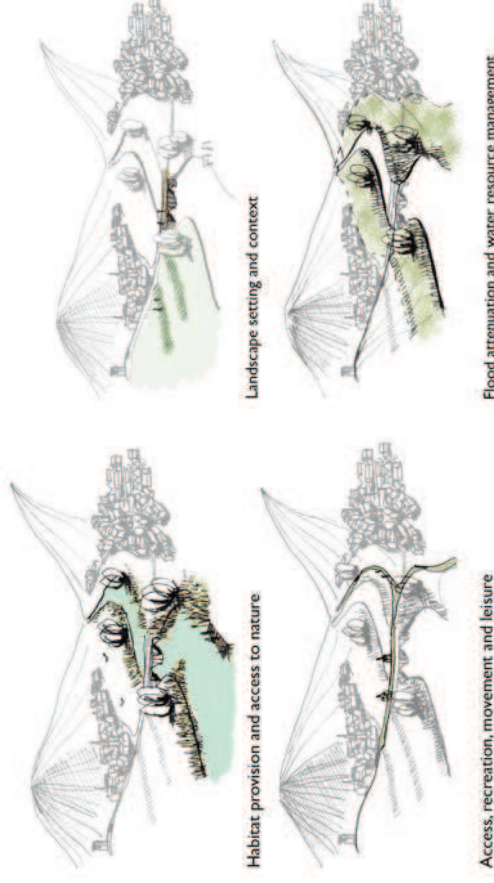
- I.6 Green infrastructure is described in **Planning Policy Statement 12: Local Spatial Planning**, as:
a network of multi-functional greenspace...both new and existing...both rural and urban...which supports the natural and ecological processes...and is integral to the health and quality of life of sustainable communities...
- I.7 This definition is reinforced and expanded in **Green Infrastructure in Hertfordshire: A Framework** and in Natural England's **Green Infrastructure Guidance**.ⁱⁱ



Aspects of multi-functional green infrastructure – links and spaces for people and wildlife

Benefits and relevance of the green infrastructure approach to East Herts

- 1.8 In the face of competition for resources and environmental change, now more than ever we must look to our landscape and to sites to perform the widest range of functions for people, communities and quality of life, wildlife and ecosystems. This concept of ‘multi-functionality’ is shown in the illustration from Natural England’s Green Infrastructure Guidance.



The green infrastructure approach: One site performing multiple functions (source: Natural England, Green Infrastructure Guidance)ⁱⁱⁱ

- 1.9 East Herts has a rich green infrastructure resource centred on the principal river valleys of the Lee, Beane, Quin, Rib, Ash and Stort in addition to a varied mosaic of landscape and habitat types, such as grassland, ancient and plantation woodland and farmland. The landscape of East Herts is a relatively simple and unified, intact and strongly rural, often tranquil chalk landscape of lightly settled Wooded Plateau Farmlands, cut by a network of well defined Wooded Chalk Valleys. East Herts has a distinctly rural character defined by the agricultural land use, low density settlement and the tranquil river valleys that flow through the agricultural landscape

I.10 There is also a wide array of existing green infrastructure assets and initiatives in the District, such as promoted greenway routes along the river corridors and on disused railway lines, Hartham Common and the Meads and the historic landscape of Pishiobury Park and ongoing positive restoration taking place at Panshanger Country Park.

I.11 Against this must be considered issues of green infrastructure need and demand, how existing green infrastructure is performing, and the potential for green infrastructure to contribute to landscape and environmental enhancement in more fragmented, southern parts of the District (presence of major transport corridors and large settlements).

I.12 In some cases, existing GI assets are delivering the necessary functionality, in others not. This pattern of demand and supply forms the basis for the analyses undertaken and proposals made in this plan.

I.13 This Green Infrastructure Plan seeks to address links and connections, alternative greenspace provision and low cost, maximum benefit interventions such as improved landscape management to deliver a wider array of functions. It also looks at ways to influence sustainable living modes and transport choices through non spatial and educational projects to support spatial proposals.

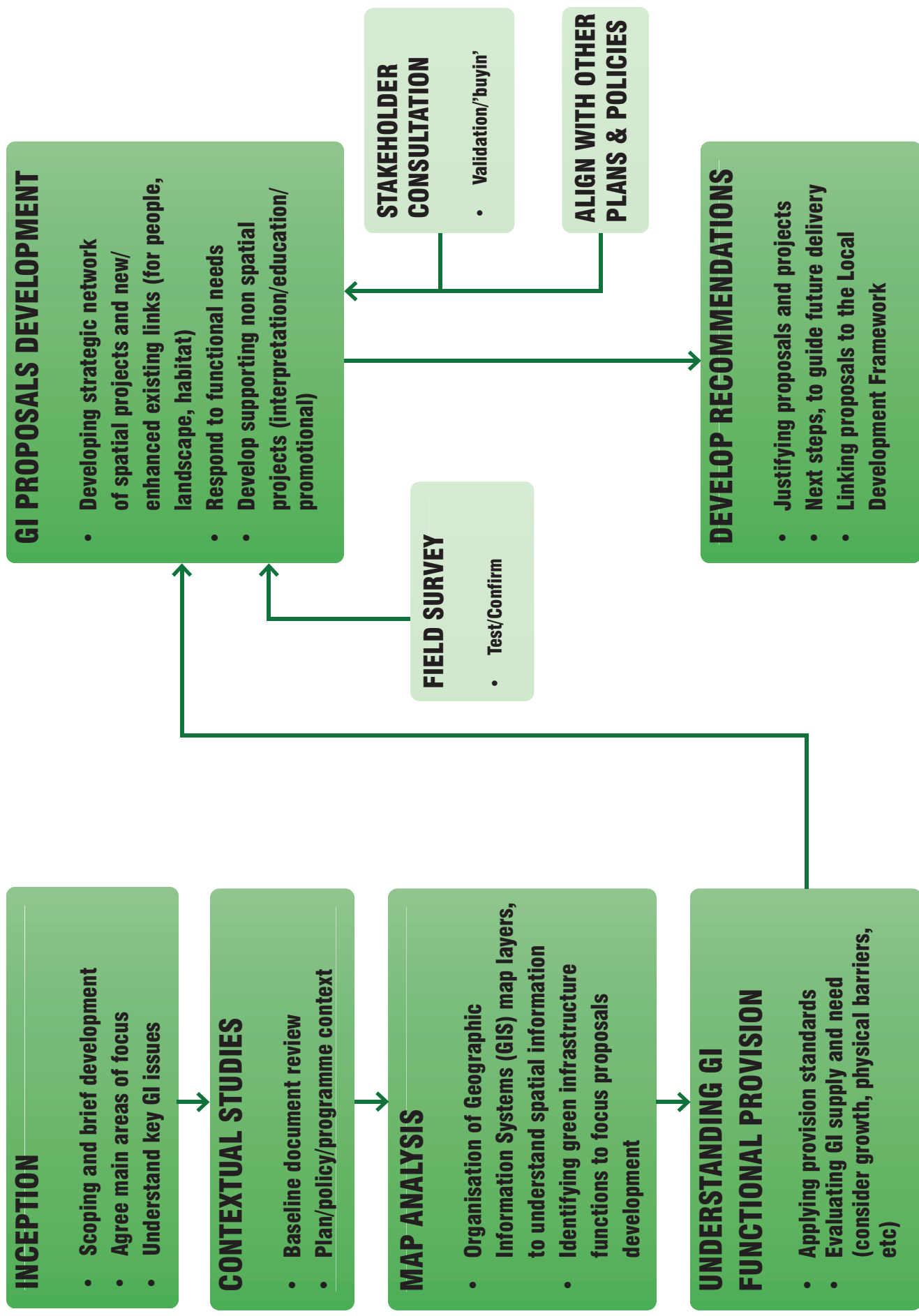


The varied green infrastructure of East Herts

The green infrastructure planning process – a summary

I.14 For the purposes of this study, the green infrastructure planning process can be summarised in the diagram overleaf.

Developing the Green Infrastructure Plan: Summary of Process



STRUCTURE OF THIS GREEN INFRASTRUCTURE PLAN

I.15 The remainder of this Green Infrastructure Plan is set out as follows:

- Section 2: Green infrastructure demand and opportunity in East Herts by function
- Section 3: Proposed green infrastructure network and projects
- Section 4: Linking the green infrastructure proposals to local spatial planning

I.16 Appendices are presented in a separate volume. **Appendix 1** sets out the record of stakeholder consultation undertaken as part of the study. **Appendix 2** shows the summary findings from a thematic document review undertaken to set the GI Plan in context. **Appendix 3** sets out the summary findings from the functional analysis.



Aspects of the green infrastructure of East Herts
Top – (l) The River Ash, (r) Hartham Common and the Meads;
Bottom – Typical agricultural landscape in East Herts


2 Green infrastructure demand and opportunity in East Herts by function

- 2.1 To evaluate existing green infrastructure opportunities, a rapid thematic document review was undertaken to understand the environmental and social context. The themes for the document review are different from but are linked to and have informed the separate analysis of GI functional provision.
- 2.2 Themes for the literature review were:
- Access and recreation
 - Landscape character and experience; settlement setting
 - The historic environment
 - Health and deprivation
 - Functional ecosystems and flood risk
 - Productive landscapes (orchards and allotments) and land in Higher Level Stewardship (HLS)
 - Land remediation (issues concerning mineral sites and restoration, derelict and previously developed land)
 - Nature conservation
- 2.3 Documents reviewed and key messages from each theme are set out in **Appendix 2**.

GREEN INFRASTRUCTURE FUNCTIONS

- 2.4 Key to understanding green infrastructure and to justifying the proposals is consideration of the functions green infrastructure can and needs to perform.
- 2.5 The eleven functions which have been identified for this Green Infrastructure Plan are shown overleaf.
- 2.6 These functions have been defined and mapped to understand geographical/spatial provision of green infrastructure assets in East Herts. When considered alongside main settlements, an indication of GI demand is also provided. Consideration has been given to shortfalls and potential need in the context of future growth as identified in the emerging Core Strategy, where these areas are known. The functions have also been used to develop proposals in response to identified need and to evaluate proposals, for prioritisation and future implementation by others.

Green infrastructure functions

	access
	approach
	health
	ecosystems
	productive
	historic
	sustainability
	remediation
	nature
	experience
	flood

- 2.7 Each of the functions have been considered at either district/borough wide scale or settlement scale (including a 2.5km buffer) which varies between function and district/borough. The analysis methodology for each function (including provision standards applied) is set out at **Appendix 3**. Supporting mapping showing the distribution of GI assets and their functions is shown in relation to each function, below.

THE FUNCTIONS – SUMMARY OF NEED, SUPPLY AND OPPORTUNITY IN EAST HERTS

- 2.8 The findings from each functional analysis are summarised below.

Access to recreation



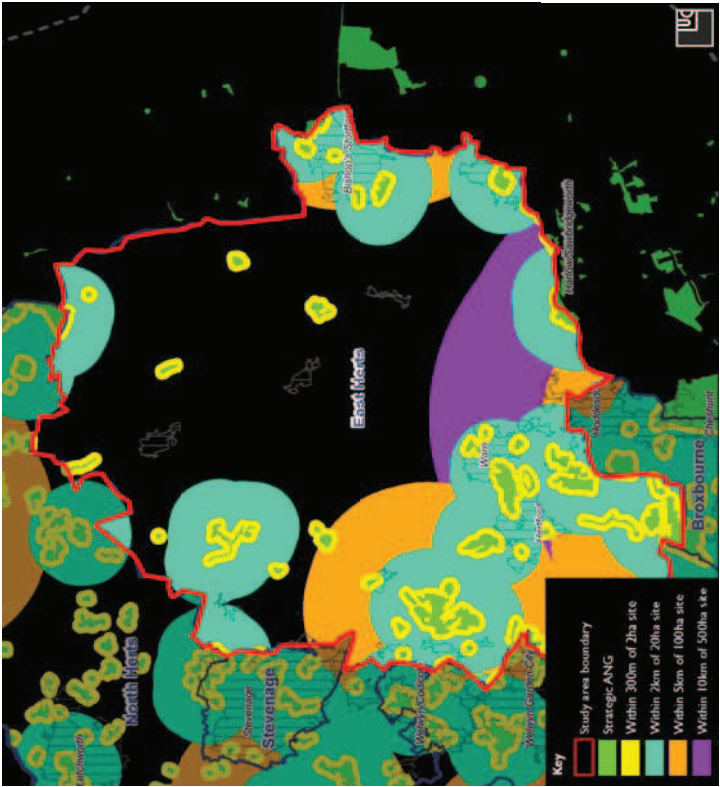
- 2.9 Accessible open space forms a key part of the quality of life of communities, although it is recognised that functionality varies according to the type and size of spaces. Areas may not always be well served due to settlement evolution and the presence of barriers to access. These issues are both relevant to some degree in parts of East Herts.
- 2.10 Applying the Natural England Accessible Natural Greenspace (ANGSt) standards deficiency in 2ha ANG and space for children sites has been identified at Hertford, the

former which should be prioritised for action (mainly through enhanced links to the wider countryside via the river valleys from Hartham Common out into the countryside (see the proposed GI network in **Figure 3.1**, section 3). Within Hertford, there appear to be few off-road links between the urban area and the surrounding countryside, and this is particularly true to the north and west of Hertford, which is severed from the countryside by the A414 and B1502 road, and this is an issue which should be addressed (see **projects 1 and 2** in section 3). Cycle provision is also limited within Hertford which should be supported through improved access as part public access enhancements across the District (as shown on **Figure 3.1**, section 3). There are also deficiencies in strategic ANG (500ha) at Bishop's Stortford, while at Buntingford there is poor provision of ANG and as well as space for children. In order to improve access to open space enhanced links along the disused railway line and river corridors has been identified (see **projects 3 & 4** in section 3).

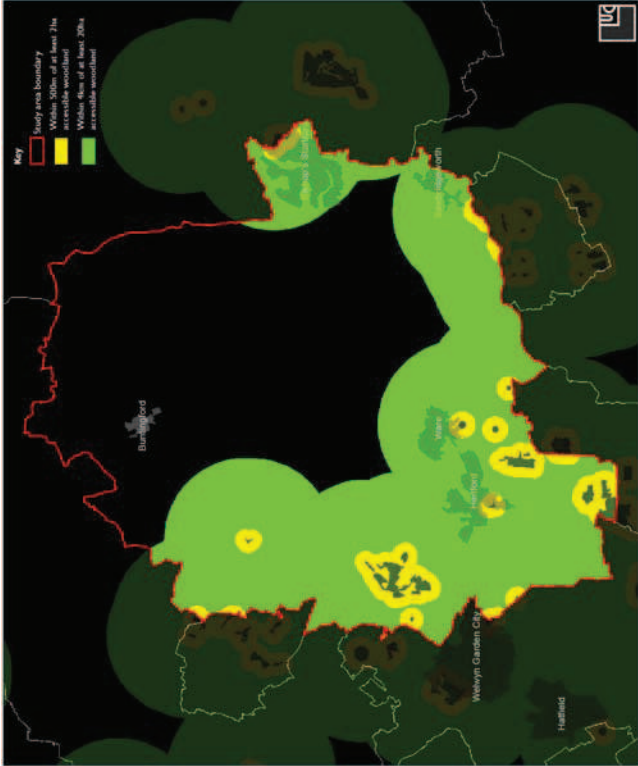
- 2.11 At Ware there is poor provision in ANG at Ware, as well as in space for children and young people. This should be alleviated through creating better public access to the countryside resource that surrounds the settlement, including the Lee and Rib Rivers. The A414 and B1502 are barriers to access to the countryside. The river corridors have been identified as areas for improvement of both habitat and physical links between the settlements at Hartham Common (see **project 1** and **Figure 3.1** in the

GI Plan). Key issues are to make improved links between Hertford and Ware and the wider countryside, while also ensuring lateral links across the District, particularly if future growth is considered to the urban fringes.

- 2.12 With reference to the Woodland Trust's Accessible Woodland Standard mapping the northern half of the District appears to be deficient in accessible woodland; however this is likely due to the nature of the land use in this area (agricultural). The south west of the District surrounding the larger settlements of Hertford and Ware has therefore formed part of the focus for a Woodland Enhancement Zone shown on **Figure 3.1**.
- 2.13 Opportunities for access improvements could be met through proposed projects for the Hertford and Ware wetland enhancements, River Valleys and Lateral Links projects, as well as improved links to strategic, cross district corridors such as the Hatfield Forest. These broad principles are shown on **Figure 3.1** and **projects 1** and **3** at section 3.

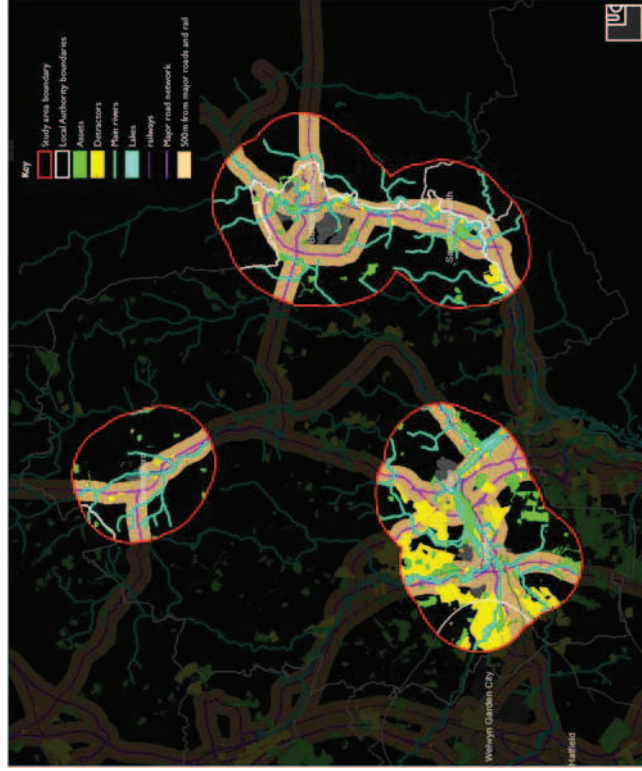


Accessible Natural Greenspace (ANG) provision, applying the Natural England ANGSt standards (source: Natural England^{iv})



Accessible Woodland Provision (Woodland Trust standard)

Prestige on settlement approach corridors



2.14 The concept of prestige, that is, the experience and perception of settlement approaches, is a key part of the green infrastructure approach and for positive planning of settlement fringes. Within the context of the principal transport corridors on the East Herts main settlement approaches, this functional analysis has referred to spatial mapping of assets and detractors produced for Hertfordshire^v, as well as consideration of landscape condition and quality in the Hertfordshire Landscape

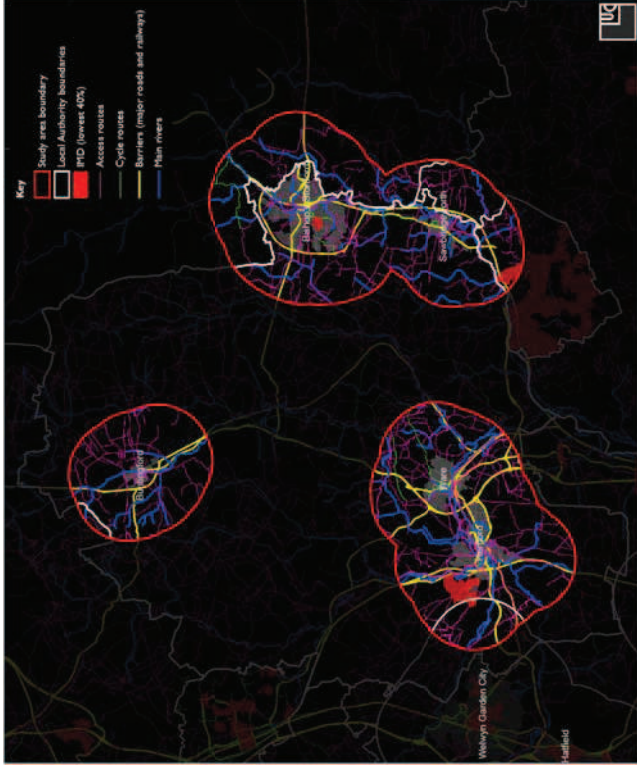
Character Assessment^{vi}. Given the time at which baseline data was drawn up (e.g. assets and detractors mapping), this does reflect ongoing positive land management and conservation (and which has been considered in developing the proposed GI network), as at Panshanger Park for example. As such that data represents a ‘point in time’ not necessarily now reflected at site level, but the data nonetheless provides a guide to help focus GI proposals development.

2.15 Within the main settlements, the experience of most of the GI assets is impaired to a degree by intrusion of transport corridors (e.g. A10 crossing of Hartham Common). Existing woodlands in the transport corridor buffers should be used as a template for re-linking woodland sites south of Hertford around Hertford Heath, to enhance settlement approach (see **project 1** at Section 3). The setting of the Stort Valley is impaired to the north of Sawbridgeworth and could be improved with small scale wetland planting as part of a package of measures to deliver proposals in the Stort Valley as identified in the Harlow GI Plan and the Stort Valley Feasibility Study, e.g. that structural green infrastructure provision, whilst buffering detractors and edges, should not detract from the more open landscape character here.

2.16 The analysis indicated a need to re-link areas of the landscape due to severance and fragmentation of landscape structure as a result of the bypass at Bishop’s Stortford. There is an opportunity to reconnect areas of woodland to enhance perception of tranquillity and settlement approach

to the north and west of the town. A key opportunity is to extend wetland vegetation and wet woodland habitat to enhance settlement edge/interface with valley at this point and to consider this as part of proposals for access links in the Stort Valley Park proposed in the Harlow GI Plan (see **project 2** at Section 3). Enhancing access to settlements from the river valleys across the District (e.g. improvements to Rivers Nursery Site on the western edge of Sawbridgeworth) could improve settlement approaches. To the east of Bishop's Stortford within Essex, expanded woodland planting could re connect Hatfield Forest and provide attenuation in relation to the M11 interchange. In Buntingford, GI enhancement issues will relate mainly to integration of hard southern edge of Buntingford with localised foiling and using such landscape structure to make better visual connections with wet woodland in landscapes such as the Quin Valley while enhanced hedgerow planting would be beneficial to the A10 bypass to improve setting of and approach to Buntingford in the landscape (see **project 4** at Section 3).

Health



- 2.17 In this analysis, access links and proximity to areas of deprivation were mapped. Main road corridors were also considered to understand where there were linked issues of ‘unhealthy environments’ (air quality and pollution), or need to target tree planting as described in relation to the ‘prestige’ function above.
- 2.18 With reference to the Indices of Multiple Deprivation (IMD) shown on the left, with areas of health deprivation are evident in Sele Ward (Hertford), with no significant

health deprivation issues in Bishop's Stortford, Sawbridgeworth or Ware although access to public rights of way and cycle routes are limited in each of these settlements.

- 2.19 In many of the larger urban areas such as Hertford and Ware and locations along major transport corridors, air quality is usually affected. As such, public open spaces, paths and rights of way and cycle routes should be buffered as far as possible through tree and woodland planting. Alternative off road links and areas of woodland creation opportunity are shown on **Figure 3.1**. This also includes areas of strategic woodland planting to high intensity road corridors such as the M11 & A414 (to extend earlier strategic level considerations and proposals set out in the Trees Against Pollution (TAP) Report^{vii}).

Sound ecosystems



- 2.20 Sound ecosystems are a key part of a green infrastructure network, and proposals should seek to contribute to positive and proactive management of these for community benefit. The focus for this analysis has been the key services of water and air quality.

- 2.21 The analysis interpreted the Water Framework Directive (WFD) data produced by the Environment Agency for river catchments. The riverine environment of the Lee, Stort, Mimram, Rib, Beane, Quin & Ash Rivers are

identified as being of poor ecological status and vulnerable to abstraction and low flow pressures. Key areas for expansion identified in the Wetland Biodiversity Action Plan (BAP) include the Stort valley, Lee and Stort confluence (Rye Meads and the Lee between Hertford and Ware, including the Rib and Beane confluences) and the Mimram Valley.

2.22 The analysis indicates a need for positive management of the all the rivers in the district, particularly the Ash due to the high level of environmental contaminates. Opportunities include reinstatement of native wetland and riparian river valleys. Also additional wetland creation in the Ash and Lee to reinforce it's habitats in light of high abstraction pressures. Whilst this does not apply to the Lee, the majority of the river courses and riverine environments are affected by clusters of invasive species along their length.

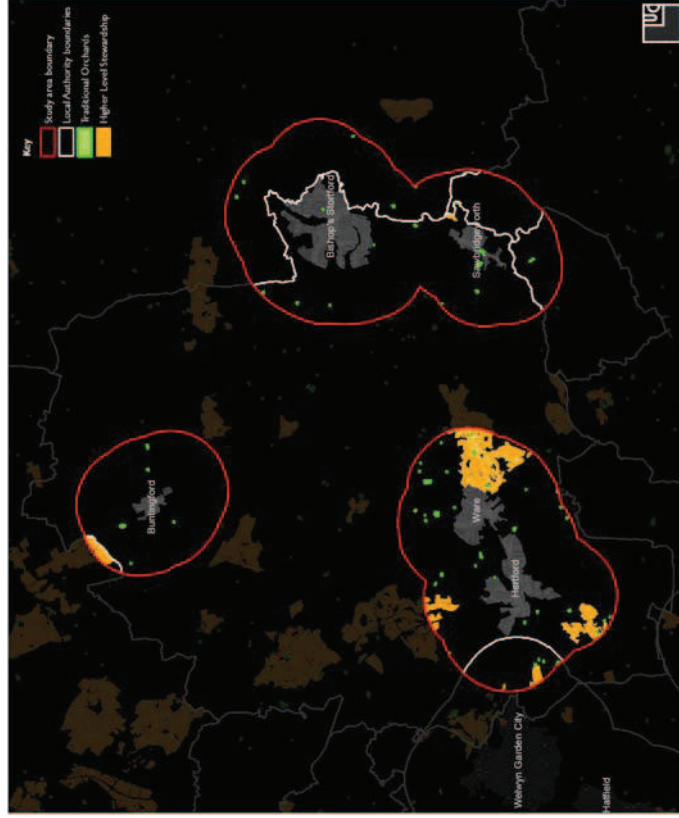
2.23 Future development in Hertford and Ware, and Bishop's Stortford could place further abstraction pressures on the Lee, Ash and Stort Rivers, further heightening the need for positive management of the river network and appropriate wetland expansion.

2.24 The analysis indicates a need for positive management of the Ash and Beane their various brooks within the District. There is a significant opportunity to enhance and expand wetland character near pinch points such as at Hertford and Ware where the rivers of the District meet. Also reinstatement of native wetland and riparian river

corridors, and making 'space for water' (see **project 3** at section 3).

2.25 Whilst large parts of the principal transport corridors are partly wooded (M11) there is a need for additional woodland and hedgerow belts to re connect existing woodlands and improve air quality. Primary locations are the infrastructure corridors M11 & A414 (e.g. to deliver continued woodland buffering in areas such as Panshanger Country Park and Broxbourne Woods) and the A10, focussing on links to existing large scale woodlands such as Broxbourne Woods.

Productive green environments



- 2.26 Consideration of the wider farmland landscape in East Herts reveals that a relatively high proportion (864.50 ha) of the landscape is managed through Higher Level Stewardship (HLS). These areas are spread throughout the north and west of the District (e.g. Benington and the lower Ash Valley) with large areas focused around Hertford and Ware. However, most of the land in stewardship lies outside the 2.5 km settlement buffer

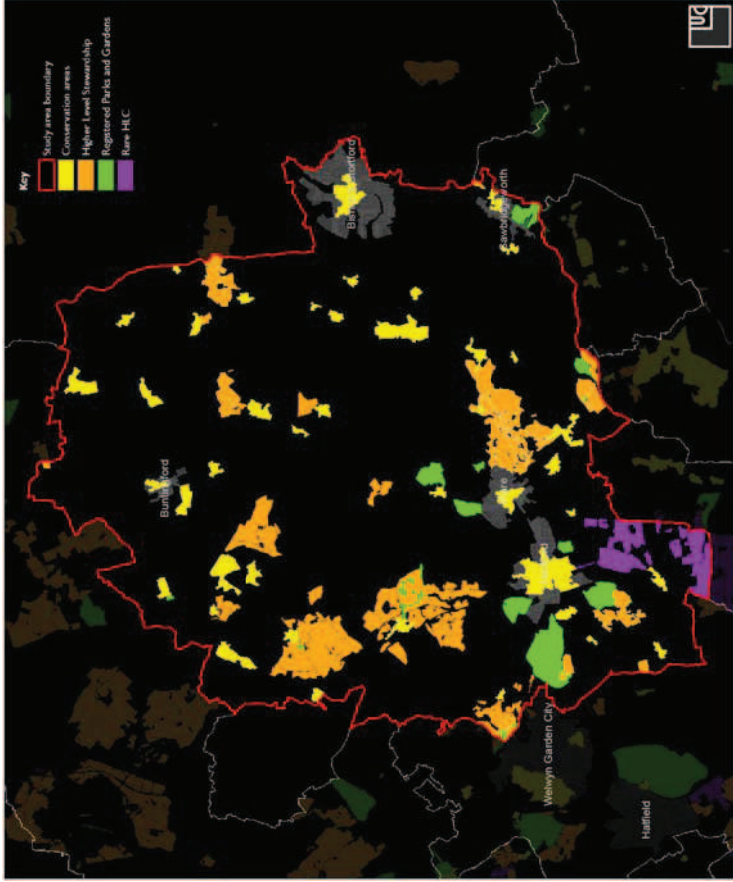
defined for this analysis as shown on the map. In addition there is a small area forming part of the Rivers Nursery Site at Sawbridgeworth. There is potential to improve uptake of organic level stewardship with the District currently having only one site (81ha). HLS uptake is therefore a key opportunity to enhance productivity and functionality of farmland landscapes in East Herts. It would also help deliver the objectives of the Farmland Conservation and Enhancement Zone and Landscape Restoration Zone identified on **Figure 3.1**.

- 2.27 Small areas of the District along its eastern and southeast border (e.g. Sawbridgeworth) fall within the Essex Coast and Growth Areas HLS Target Area. HLS schemes which will be supported within this area include those which seek to maintain, restore or create wet woodland or ancient semi-natural woodland. An opportunity therefore exists to benefit both biodiversity and the production of timber and/or biofuels by tree planting, support for natural woodland expansion or the bringing of existing woodland under management such as coppicing.

- 2.28 The Rivers Nursery site at Sawbridgeworth has historic importance for fruit production and breeding and is cited by the East Herts Core Strategy Issues and Options as one of the open spaces of particular importance to the settlement's character. Recognising multi-functional values of historic orchards in the District is important. (**project 2**, section 3).

2.29 There is an opportunity to improve the quality and value of many of these allotment sites throughout the District, but also to provide enhanced urban greening and locally productive landscapes as part of GI proposals including river valley enhancement (**project 3**, section 3).

Conserving historic landscape character



2.30 The historic environment and historic legacy provides a rich resource for conservation and interpretation as part

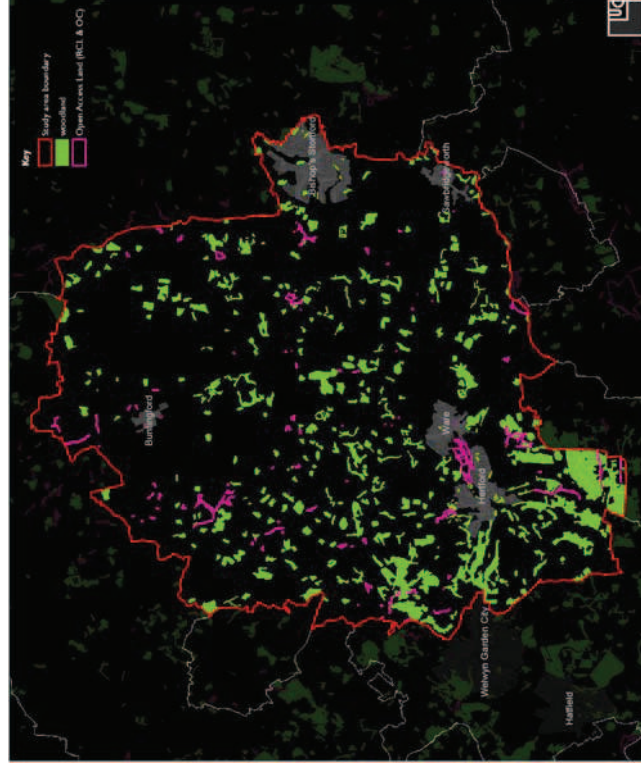
of a multi-functional green infrastructure network. It also clearly links to other functions such as prestige, experience and the potential for recreation. This analysis considered the distribution of designated heritage assets in addition to rare historic landscape character types, as a basis for identifying aspects of historic legacy to be conserved as part of the GI network.

Rare historic landscape types in East Herts are Co Axial Enclosures, which occupy around 1% of the District area. The Co Axial Enclosures (boundaries of adjacent fields make a series of long, roughly parallel lines) form part of the Farmland Conservation and Enhancement Zone on **Figure 3.1**.

2.32 Although there are a high number of Registered Parks and Gardens (15) and a high number of Conservation Areas scattered throughout the District. Only four of the fifteen registered parks are covered by agri-environment schemes. In addition a number of ancient woodland sites are statutorily designated for nature conservation as Sites of Special Scientific Interest (SSSI). These include ancient woodland at High Wood (west of Benington), Moor Hall, Plashes Wood, Wormley Wood, Hodeson Park, Broxbourne Wood and Great Hormead Park. There is a very large and rather dispersed ancient woodland resource, with two covered by Conservation Areas (Moor Hall Wood and Hadham Cross Wood), while parts of Broxbourne Woods in the south of the District has additional protection as a National Nature Reserve (NNR).

2.33 Key opportunities are to secure protection and enhancement for the woodland resource through HLS and Woodland Grant Schemes, and also through additional broadleaf native woodland planting to reconnect sites. If this was concentrated around registered parklands, in particular the area surrounding the settlements of Hertford and Ware, this could also help enhance their setting and context (see **Figure 3.1**). Another opportunity may be more sympathetic/appropriate management of replanted woodland sites e.g. Waterford Heath (a former mineral site at Hertford).

Sustainability and responding to climate change

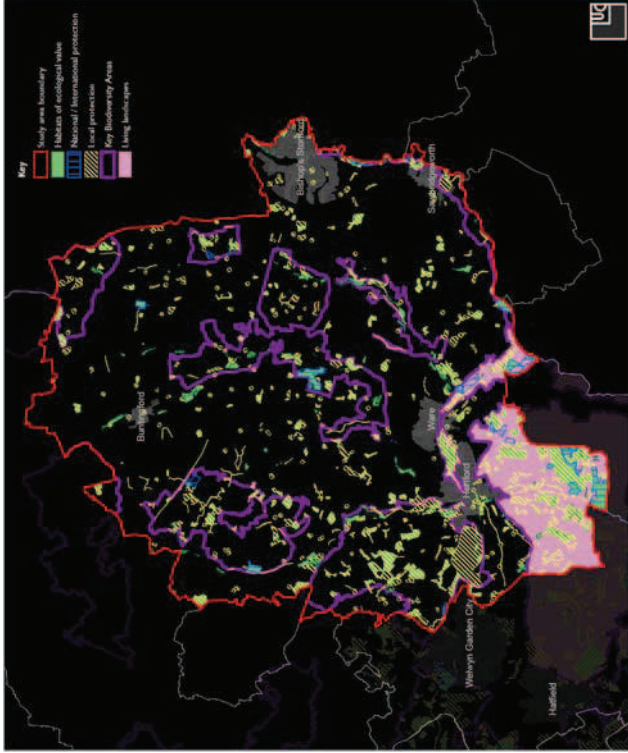


2.34 Urban greening, shading and cooling is a key part of community focussed green infrastructure. This analysis has concentrated on tree cover. There are however clear links with other functions such as flood attenuation and water management, as part of a climate change adapted response to spatial planning. This function is particularly relevant to the higher density settlements within the District, such as Hertford and Ware, and Bishop's Stortford.

and St Mary's Lane sites. These have formed foci for landscape enhancement zones shown on **Figure 3.1** and for projects to deliver wider connectivity for green infrastructure assets to settlement gateways, e.g. linking the positive restoration taking place at Panshanger Park with other mineral sites at Waterford Heath and St Mary's Lane (**project 5** at section 3).

- 2.40 Areas of lower landscape quality as identified in the Landscape Character Assessment tend to have been previously worked for minerals. These occur in close proximity to the larger settlements of Buntingford, Bishop's Stortford, Sawbridgeworth and to a larger extent around Hertford and Ware. As such they form part of the focus for ongoing landscape conservation, enhancement and restoration zones as shown on **Figure 3.1**.
- 2.41 Due to the number of mineral sites and their proximity to each other (e.g. surrounding Hertford and Ware), proposals should aim to connect and improve the quality of the land, thereby enhancing the character of the landscape. This could be brought forward as part of the ongoing Panshanger Park restoration (see **project 5**).

Nature conservation



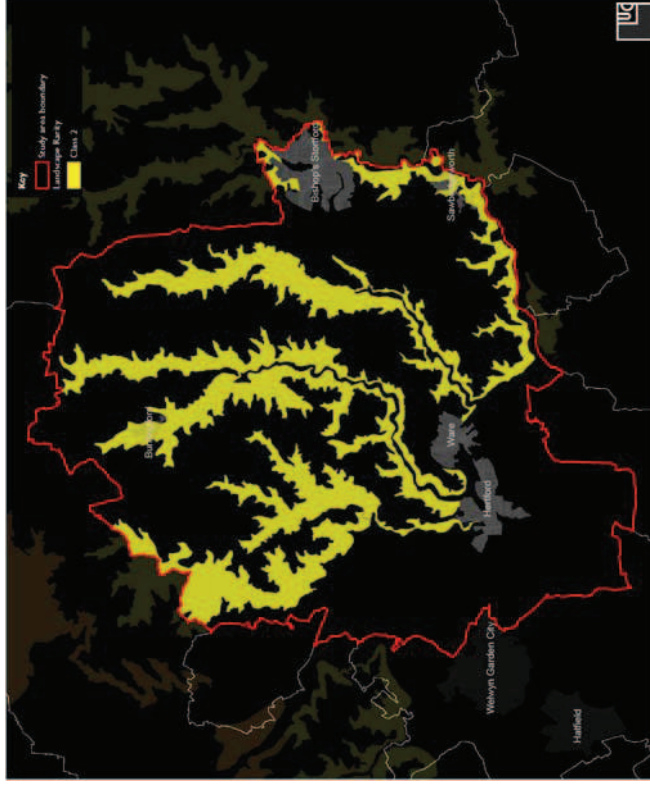
2.42 Conservation and enhancement of habitats, together with planning for sustainable communities, is a key consideration of multi-functional green infrastructure planning. This plan has taken a landscape scale approach, considering Hertfordshire Biodiversity Action Plan Key Biodiversity Areas (KBAs), in addition to statutory and locally designated nature conservation sites and areas of local protection (Local Wildlife Sites).

- 2.43 Primary issues relate to the connectivity of habitats in light of future landscape change and climate change, and barriers to habitat connectivity created by the transport network. Main barriers to habitat links are the M1 close to the east district boundary, the A414 to the south and the A10 running north/south along the centre of the District.
- 2.44 The analysis identifies core biodiversity areas through the south west of the District, in addition to the principal river valleys – the Lee, Beane, Quin, Rib and Stort. The majority of the remainder of the District is identified for habitat extension and linkage. The two most common threats to ecologically valued habitats across the district is first the relatively small and isolated patch size, which has inherently limited viability in the long term, and second, the conflict between recreational use and nature conservation. The Woodland and Heathland BAPs identified additional key threats as the lack of / changing management practices. The Wetlands BAP identified additional threats of low water levels and drainage, natural succession, nutrient enrichment, acidification and pollution (see **project 3**, section 3).
- 2.45 Key opportunities include ensuring the consideration of green infrastructure provision within the strategic / Masterplanning of proposed development. Expanding of existing wetland features to a varied wetland mosaic, for example, including wet grassland, carr and open water could also improve biodiversity. Key areas for expansion identified in the Wetland BAP include the Stort valley, Lee and Stort confluence (Rye Meads and the Lee between

Hertford and Ware, incl. the Rib and Beane confluences)
and the Mimram Valley.

2.46 Grassland and heathland expansion identified in the BAP have been drawn out in the enhancement zones identified in **Figure 3.1** of the GI Plan. Woodland enhancement zones include both Broxbourne Woods and Knebworth Wood (West of Stevenage). These should help alleviate severance along transport infrastructure and use of such linear features as foci for connectivity, for example, expansion of wildlife corridors along the existing transport network, using the principles of the Trees Against Pollution initiative are also important measures to be considered.

Experience



2.47 The main regionally rare landscape types in East Herts have been identified as Settled Chalk Valleys and Wooded Chalk Valleys landscape types. The Settled Chalk Valleys represent approximately 19% of the District area (significantly this also represents approximately 43% of the total regional distribution of the landscape type) and the Wooded Chalk Valleys represent approximately 4% of the District (note that this also represents approximately 10% of the total regional distribution of the landscape type).

primarily open space; although there are instances of floodplain development in both settlements (e.g. the floodplain flows through Lower Sheering in Sawbridgeworth).

- 2.53 Future development in close proximity to the rivers within East Herts could exacerbate existing pressures in this area so identifying areas for wetland expansion may help alleviate this pressure. Any future settlement growth is likely to increase pressures during periods of high flows and could inevitably lead to flooding of developed land.
- 2.54 The need to 'make space for water' outside and upstream of main settlement pinch points has formed part of the focus of a River Valleys project (**project 3**) at section 3, and also the Wetland Habitat Zone shown on **Figure 3.1**.

3 Proposed green infrastructure network and projects

GREEN INFRASTRUCTURE VISION

3.1 The green infrastructure vision for East Herts is:

To conserve and enhance

- The varied landscapes of the District – farmland, ancient woodland, wooded chalk valleys, settled chalk valleys, heathlands and commons and intricate network of river valleys;
- The functionality of the riverine environments of Mimram, Beane, Rib, Quin, Ash, Stort & Lee in terms of landscape character, ecology and flows and improving water quality throughout;
- The quiet rural landscape character and distinctive agricultural landscape, while also linking areas of broadleaf woodland to provide increased landscape connectivity and resilience in the face of climate change, balancing this with large scale open landscape character;

To improve and create

- Enhanced wetland networks associated with the East Herts Rivers – Lee, Beane, Rib, Quin, Ash & Stort;
- Accessibility and connections to and along the river valleys and lateral links across the District to adjoining

districts in Hertfordshire, Essex and north London GI network;

- Links for a variety of users – walkers, cyclists and riders;
- ‘Space for water’ - naturalising river courses to reduce the potential for flooding in the District and aid creation of additional recreational water spaces;
- Enhanced links to greenspace, particularly in the larger and higher density settlements such as Hertford and Ware, and Bishop’s Stortford and outlying suburbs, and Buntingford and Sawbridgeworth, as well as opportunities for urban greening for community benefit and value, such as orchards;

To recognise and value

- The importance of links between landscape and nature and ensuring that this is the first layer of consideration in the development process;
- The significance of Community Forestry, and links to the aspirations of Watling Chase Community Forest;
- GI for people – the importance of provision for low key and informal recreation to enhance the value of existing green infrastructure, and creating/promoting an improved series of links between settlements, commons and the wider countryside;
- The importance of the green infrastructure network for health and quality of life, seeking to promote awareness and appreciation of the network;

- The need for an appropriate balance between community, access, recreation and biodiversity interests;
 - The need for joined up working with key partners, landowners, the parish councils and local 'green groups' to deliver sustainable proposals;
 - The educational potential of GI - the need to raise awareness of and promote linked agendas such as local food including recognition of the importance of historic orchards throughout the District.
- 3.2 The vision is necessarily aspirational and long term, since it will need to consider GI significantly beyond the current Local Development Framework. Proposals to begin achieving the vision and initial consideration of delivery are set out in the remainder of this section.

DELIVERING THE VISION – THE NETWORK

Rationale, key messages

- 3.3 The proposed green infrastructure network has been developed in response to the key messages from the document review and the functional need and supply analysis in **section 2**, and to deliver the points of the vision above. It has been proofed against the adjoining authorities' green infrastructure context and other relevant spatial plans, policies, programmes and projects. The proposals have also been validated through stakeholder consultation (the main messages from the stakeholder workshop are in **Appendix I**).

- 3.4 The proposed Green Infrastructure Network is shown on **Figure 3.1** and the component action zones and green infrastructure types which make up the GI network are described below. Spatial projects and non spatial proposals which deliver the GI network are explained at the end of this section, with spatial projects cross referenced to **Figure 3.1**. This includes high level consideration of cost, phasing and delivery and management mechanisms. Recommendations to link the green infrastructure proposals to delivery through spatial planning are set out in **section 4**.

Green infrastructure action zones

- 3.5 Several 'action zones' have been defined for the wider green infrastructure network. Shown on **Figure 3.1**, these are:
- **Wetland Habitat Zone:** Restoring and enhancing the quality of the river valley network (chalk and clay rivers) and associated wetland habitats which form part of Wetlands BAP. Aim to create landscape links to adjacent authorities (e.g. Welwyn, Essex and north London) and to sites such as Broxbourne Woods and the Lee Valley. The zone and component projects can also contribute to delivery of Natural England's Thames and Tributaries Integrated Biodiversity Delivery Area (IBDA) and are complementary to the aims and objectives of the Thames Catchment Flood Management Plan.

- **Woodland Enhancement Zone:** linking woodland habitats (e.g. lowland wood-pasture, heathland and acid grassland and alder wet woodland) and restoring landscapes/defining the network of valleys including regionally rare Wooded Chalk Valleys. This includes continued enhancement to the setting of historic GI assets such as Panshanger Park, Pishiobury Park and Broxbourne Woods – buffering and protecting such sites, through creating woodland linkages.
- **Valleys Conservation Zone:** conserving key GI assets as part of the movement, habitat and physical landscape network, also securing links to the river valley network and associated Wetland Habitat Zone. Links to landscape restoration and enhancement in the Lee and Stort Valley's and delivering landscape character assessment objectives in this area (considered jointly with Welwyn Hatfield).
- **Farmland Conservation and Enhancement Zone:** Conserving and reinforcing the rural green infrastructure network, securing landscape and habitat connectivity. Also encouragement of agri-environment schemes take up (at both entry and higher level) to deliver landscape and GI improvements across the farmland landscapes of the District.
- **Grassland Creation Zone:** Arable farmland is an intrinsic part of the landscape of East Herts and is woven into its fabric. Whilst it is important that it is recognised and retained, projects should also be identified for

grassland restoration to enhance landscape character and interpret aspects of historic character. The zone seeks to identify areas where enhanced grassland linkage/corridors could be considered, to reduce fragmentation of existing assets, balanced with consideration of farming viability. Primary areas are associated with woodland clusters such as Broxbourne Woods and the area north of Panshanger Park. Clearly delivery objectives for this zone will be dependant on appropriate grassland management (grazing).

3.6

These zones are colour coded on **Figure 3.1**. They indicate broad areas in which future small scale projects could contribute to the objectives of the zone. They do not relate to large scale or 'blanket' proposals. For example, the Woodland Enhancement Zone does not indicate mass woodland planting, rather an area where woodland enhancement and linkage, of even small scale, is desirable/meets a range of functional criteria, and should therefore be supported.

Green infrastructure types in East Herts

3.7 A series of green infrastructure types have been defined to
organise proposed green infrastructure projects in East
Herts, these are:



Urban greenways



Urban blue links



Urban wildspace



Peri urban wildspace



Rural wildspace



Rural blue links

Proposed green infrastructure projects

Working with East Hertfordshire District and key professional and community stakeholders, a series of potential projects have been identified to take forward the GI network and to deliver the functions identified and analysed in **section 2**. These are described at the end of this section, which also identifies supporting non spatial GI projects. **Section 4** identifies potential future work for East Herts to consider in delivering green infrastructure. Due to the high level nature of this study, more detailed

3.8

work will be needed to test and develop proposals (e.g. further ecological work and advice to determine requirements for suitable habitat creation and enhancement at a local level).

3.9 The GI projects (shown on **Figure 3.1**), are as follows:

- **1. Hertford and Ware Wetland Enhancements**
- **2. Stort Valley and Countryside Links**
- **3. River Valleys Project – Lee, Stort, Rib, Beane, Quin & Ash**
- **4. Lateral Links – Green Link between Bishop’s Stortford and Stevenage**
- **5. Panshanger Park and Mimram Valley Greenspace**

3.10 These are described in the tables at the end of this section. A further, non spatial (thematic or interpretative) project (**project 6: Green Hertfordshire**) is identified at the end of this section.

3.11 Also identified at the end of this section are GI links with adjacent Hertfordshire authorities, to signpost where ‘joined up’, cross authority working will be required.

3.12 Projects are prioritised according to the functions and benefits they offer, with an indication of steps likely to be required to deliver. Broad consideration is also given to costings, to give a guide as to future levels of investment in

delivering capital works, using the following indicative rates/bands:

£ = Up to £50,000

££ = £50,000-100,000

£££ = £100,000 – 500,000

££££ = £500,000 – 2million

£££££ = £2million +

3.13 Note that costs are indicative/guidelines only and are based on LUC’s knowledge and experience of delivering comparable schemes. They represent a reasonable best estimate of investment costs to deliver the required green infrastructure functionality. It is also recognised that further, more detailed green infrastructure planning and cost planning will be required. Where a project is a series of component sub projects, this will have an effect on costs. As such, proposals are a ‘palette’ of projects which East Herts and partners can pick from as appropriate funding streams become available, but which will still help deliver the overall green infrastructure vision. In considering cost ranges, account has also been taken of match funding and grant aid in broad terms e.g. that where this applies, the net effect is to reduce costs of schemes in real terms. Potential funding sources are identified as appropriate in the project sheets at the end of this section.

- 3.14 Consideration is given in broad terms to further work needed to deliver projects in the following project sheets. As a general rule, in addition to the liaison, consultation and negotiations identified, each capital project will also require further survey work – land, ecological and archaeological surveys, in addition to impact assessment of proposals and projects in ecologically sensitive areas.

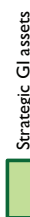
Hertfordshire Green Infrastructure Plans - East Hertfordshire Figure 3.1: Proposed Green Infrastructure Network

Key

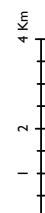
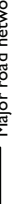
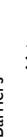
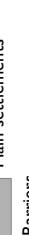
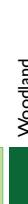
Proposals



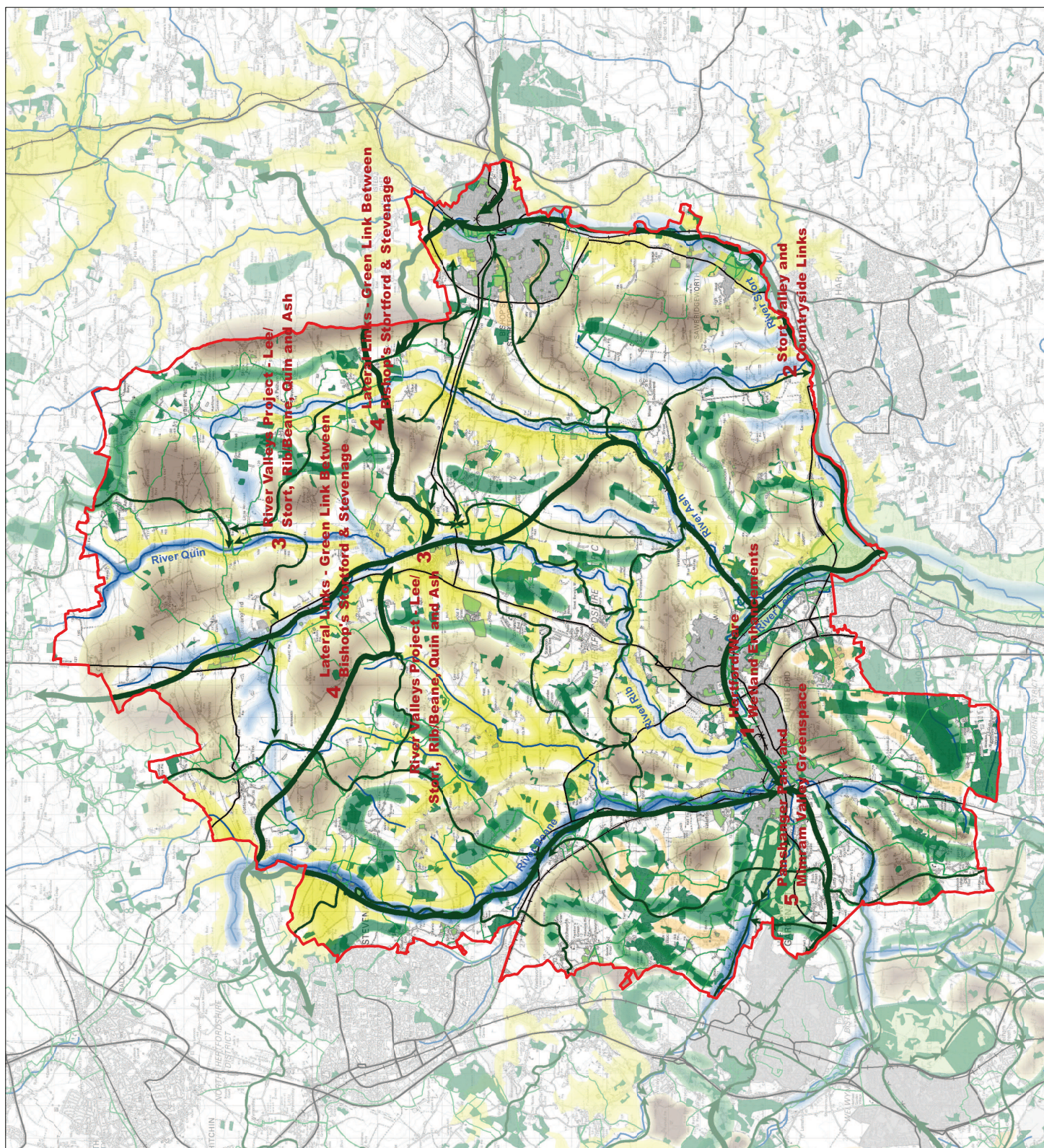
1 Green infrastructure projects



Existing



Date: 31/03/2011
Revision:



Urban Blue Link - Brief description / snapshot of the project :



- Improve access and allow for a more positive approach to Hertford and Ware balancing formal and informal recreation and nature conservation interests while enhancing provision for informal natural play spaces for different age groups and interests
- Extension of existing wetland project at Hartham Common and links to Hertford 'Green Fingers'
- Conservation and enhancement of the distinctive wetland environment including enhanced physical and habitat links to urban stretches of the River Lee creating improved landscape, recreational and visual linkages between the settlements enhancing the urban setting
- Significant opportunity to further enhance wetland character to reduce potential flood risk associated with pinch points in urban areas by creating enhanced 'space for water'
- Appropriate management of wetland west of the A10 would create a transition between the managed recreational landscape at Hertford and the more naturalistic landscape at Ware
- Physical links to the wider GI network (e.g. Amwell Quarry) to serve strategic links to Lee Valley
- Proposals for improvements to network of access paths creation of lateral links to Project 2

FUNCTIONS MET :

access	prestige	health	ecosystems	productive	historic	sustainability	remediation	nature	experience	flood mgmt

PLANS / POLICIES / PROGRAMMES WHICH THE PROJECT CAN HELP DELIVER : Improving physical (upgrading of footpaths/routes) and habitat links to enhance the riparian character and wetland habitat connections between Hertford and Ware while also improving enhanced 'space for water' (responds to Environment Agency's (EA) Water Framework Directive (WFD) issues of ecological quality/flows). Green link enhancements will contribute to the Hertfordshire Rights of Way Improvement Plan (ROWIP), while the creation of informal play areas will address deficiency identified in the strand analysis. Enhancing the functionality of the Common and access routes to it will help improve the available provision of natural greenspace to the area, contributing to the provision of Accessible Natural Greenspace (ANG).

ISSUES ASSOCIATED WITH DELIVERY : Need for landownership liaison and negotiation. Project will need an action plan. Project could be partly achieved through small scale funding through High Level Stewardship (HLS) and Heritage Lottery Funding (HLF) or more locally based initiatives under a series of guidelines or a series of 'how to' guides for local green groups, volunteer organisations, parishes and Trusts (e.g. Groundwork). Need for link with local societies e.g. National History Society. Need for education and awareness raising in relation to enhancement/management. Funding and delivery of the different facets may need to be phased and assessed on merit within the wider scheme, with a clear delivery method stating key elements for a successful project. Appropriate management and resource capabilities will need to be funded. Large scale funding through government bodies, i.e. HLF might come up against competition from other projects within the county.

DELIVERY PARTNERS AND MONITORING MECHANISMS : Potential developer contributions through off-site Community Infrastructure Levy (CIL).106. Need for liaison with Herts and Middlesex Wildlife Trust (HMWT) to avoid conflict of users needs and nature conservation. Contact should be made with Environmental Agency, HMWT, Natural England, Parish Councils and relevant local scale partners who can deliver on small scale projects. HWMT and District Council, including government funded schemes (e.g. HLF). Higher Level Stewardship (HLS) is one of the main delivery mechanisms for landscape capital works. As part of the wider strategic plan, this could involve key bodies such as the EA, Lee Valley Regional Park, Woodland Trust, Natural England (through Access to Nature) and joint funding initiatives between Counties. A feasibility study should be a priority and monitoring for components is likely to be through visitor and species surveys, as well as take up of grant schemes such as HLS.

WHAT HAPPENS NEXT? PRIORITY / RANKING : Priority for access improvements from Hertford town to Hartham Common including access along the River Lee also physical improvements to the footpaths/river crossing points. Need for early liaison with landowners and relevant partners.

RURAL WILDSPACE - Brief description / snapshot of the project :



- Recognising and valuing the rural landscapes in and around the Stort Valley and encouraging sustainable management of aspects of the habitat mosaic e.g. grassland and ancient woodland plus enhanced woodland and wet woodland linkage
- Enhanced pedestrian access and habitat links from the Stort Valley and Harlow to local GI sites of interest (Rivers Nursery Site, Lee Valley and river network) plus wider farmland landscape
- Selective landscape management which enhances legibility and permeability (balanced with nature conservation interests) and improved signage/interpretation which could extend to links from Hertford and Ware to Harlow and Sawbridgeworth (and outlying rural villages e.g. Gilston)
- Reinforcement of the green back drop to Harlow and Sawbridgeworth, where conserving Gilston Park's woodland and Pishiobury Park could enhance the rural character of the area
- Creation of a series of local walking links to nearby towns which could include a sculpture trail to recognise the rich cultural heritage of the area, e.g. connections between Henry Moore at Perry Green and 'parallel' modernist landscapes of Harlow New Town



FUNCTIONS MET :

access	prestige	health	ecosystems	productive	historic	sustainability	remediation	nature	experience	flood mgmt

PLANS / POLICIES / PROGRAMMES WHICH THE PROJECT CAN HELP DELIVER : Enhancing grassland and ancient woodland across the District will help support a number of important UK Biodiversity Action Plan (BAP) habitats and will help reinstate habitats such as broadleaf woodland at Gilston Park. Re-generation of the ancient woodland and enhancement access links with the aspirations for the Stort Valley. Improved access and the creation of new routes, with circular walks and cultural trails will contribute to functionality of the Gilston Park making it more available to local and visiting users, contributing to the aims of the ROWIP. Projects links to and complements Harlow GI Plan and Stort Valley Plan while it also helps meet ANG requirements.

ISSUES ASSOCIATED WITH DELIVERY : Land ownership and HLS uptake are key issues, while possible changes in land (e.g. access v grassing) use will require further consultation with land owners and user groups. A co-ordinated approach to the access, landscape enhancement and ancient woodland improvement projects will be important requiring EHDC and landowners to work together with Natural England (NE) and HWMT. Need for liaison with Woodland Trust, Farm and Wildlife Advisory Group (FWAG) and Eastwick and Gilston Parish Council. Environmental Stewardship will enable delivery at a landscape scale. Also need for liaison with local friends groups e.g. Rivers Nursery Site

DELIVERY PARTNERS AND MONITORING MECHANISMS : Natural England (through HLS/ELS agreements, to encourage habitat restoration and capital payment for access, Forestry Commission, Farming and Wildlife Advisory Group, Herts and Middlesex Wildlife Trust, local Parishes, East Herts Council. Countryside Management Scheme, Sustrans and the Local Access Forum. Monitoring mechanisms could be through both species and visitor/user surveys and through take-up of relevant grant schemes such as HLS/HLF. Heritage sculpture trail has potential as an HLF project (also links with Henry Moore Foundation at Perry Green).

WHAT HAPPENS NEXT? PRIORITY / RANKING : Need for early landowner liaison to embed GI thinking in agri-environment schemes and with relevant partners such as NE, EA, HMWT and Woodland Trust. Smaller projects and those which could be delivered through HLS and HLF (given reduced match funding requirements) are high priority. Larger schemes and enhancements will require co-ordinated working with HMWT, NE and landowners under a coherent plan to deliver through initiatives such as the ELS, HLS and HLF.

RURAL BLUE LINK - Brief description / snapshot of the project :



- Conservation and enhancement of the distinctive wetland environment including physical and habitat links
- The rivers provide the setting to the main settlements and could be enhanced to provide positive approaches
- Significant opportunity to enhance wetland landscape habitat mosaic near pinch points such as at Ware and Hertford, creating enhanced ‘space for water’ and improving biodiversity in the area
- Ensure appropriate management of rivers, particularly the Ash and Beane to improve biodiversity
- Low key proposals for river access (Beane) to provide the densely populated area of Stevenage with accessible open space (links to North Herts GI and Rib Valley)
- Opportunity to enhance aspects of historic character and recognise the value of traditional orchards
- Links to Project 4 (Lateral links - green link between Bishop’s Stortford and Stevenage)

FUNCTIONS MET :

access	prestige	health	ecosystems	productive	historic	sustainability	remediation	nature	experience	flood mgmt

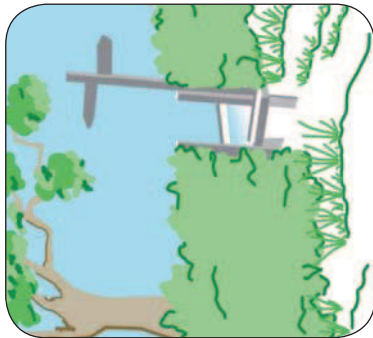
PLANS / POLICIES / PROGRAMMES WHICH THE PROJECT CAN HELP DELIVER : Enhancements will deliver improved and continuous access along the network of rivers linking with adjacent Districts and Counties. Improving the riparian character and wetland habitat connections while forming attractive, usable green links, as well as providing enhanced ‘space for water’ (responds to EA WFD issues of ecological quality/flows identified in functional analysis - key vulnerabilities of the Hertfordshire Rivers) and project will also satisfy Landscape Character Assessment (LCA) objectives. Project will contribute to improved functionality, making it more available to a larger number of users, satisfying ROWIP and ANG objectives. Stronger and more defined access links along the river corridors will connect to other key East Herts GI projects, such as the Lateral Links project (green link between Bishop’s Stortford and Stevenage).

ISSUES ASSOCIATED WITH DELIVERY : Land ownership negotiation (access/ way leaves) will be key. The project is primarily focused on improved access and upgrades to off-road links along river corridors and connections with the wider strategic county wide project of enhancing river corridors. As such, access upgrades, off road links, enhancements and creation can require significant funding to achieve a continuous standard which will satisfy fully a range of existing and new users. Where large scale funding is not available (CIL/s.106), river enhancements could be more locally based initiatives under a series of guidelines or a practical ‘how to’ for local friends groups, parishes Trusts (e.g. Groundwork) to take forward (e.g. repairing off road links / removal of invasive species as voluntary work). Also through enhanced agri environment (HLS) scheme uptake.

DELIVERY PARTNERS AND MONITORING MECHANISMS : Need for liaison with HMWT to avoid conflicting uses, East Herts Council, landowners and relevant bodies such as Natural England, Sustrans, Ramblers Association and Environmental Agency. Contact should be made with relevant local partners who can offer small scale delivery through their voluntary activity (e.g. Friends Groups), minimal funding, labour/clean up days and events. Groundwork may also be able to assist with securing funding for/delivering local community projects. East Herts Council could also help with coordination between landowners, encouraging green infrastructure deals to be considered in HLS and Entry Level Stewardship (ELS) and cross compliance at the start of these agreements. Monitoring is likely to occur through take up of HLS agreements and also through species surveys (monitoring of biodiversity) after implementation.

WHAT HAPPENS NEXT? PRIORITY / RANKING : Liaison with landowners (HLS) uptake is a priority, as is pre-application negotiations to get links and enhancements written into relevant future schemes. Priority for promotion to locally interested groups, approaching parish councils, liaison with Groundwork, friends groups and other user groups.

RURAL GREEN LINK - Brief description / snapshot of the project :



- Enhanced off-road strategic green access link (pedestrian and bridleway links) between both settlements to tie together Hertfordshire Way and Harcamlow Way with the dismantled railway line running north/south along the Rib and Ash valleys
- Providing additional loops for walkers to enable enhanced recreational/commuting links between Stevenage and Bishop's Stortford and to the Green Arc (link with the Hatfield Forest)
- Project provides scope for greater interpretation of historic elements of the District such as the Roman Road east of Stevenage as part of the route
- Urban and countryside links create a series of waterway loops which provide important off road access between larger settlements – promotion of a sustainable transport network
- Link to wetland enhancement e.g. mirror the quality of wetland environment south Braughing (River Quin) and buffer planting along roads to reduce intrusion and connect landscape elements (woodland/grassland)
- Link to Project 3 River Valleys (create a series of recreational loops across the District).



FUNCTIONS MET :

access	prestige	health	ecosystems	productive	historic	sustainability	remediation	nature	experience	flood mgmt

PLANS / POLICIES / PROGRAMMES WHICH THE PROJECT CAN HELP DELIVER : Can contribute to enhancing lateral links across the District contributing to County wide strategic objectives in the ROWIP: Potential to assist in meeting ANG deficiencies in the District through enhanced links. Linked habitat creation e.g. woodland and grassland buffers to reconnect landscape features is complementary to LCA and BAP objectives and to climate change responsiveness. Landscape enhancement has potential to link Key Biodiversity Areas (KBA).

ISSUES ASSOCIATED WITH DELIVERY : The project covers both green access links spanning the width of the District where a co-ordinated approach will be important requiring East Herts Council to work together with Hertfordshire County Council (HCC) and landowners (key landowners need to be identified). Land ownership and negotiations are therefore key issues. Need for further archaeological survey and feasibility studies in relation to the Roman Road. Need for enhanced HLS uptake to deliver works.

DELIVERY PARTNERS AND MONITORING MECHANISMS : Landowners and Natural England (through HLS/ELS agreements to deliver landscape capital improvements). East Herts Council (enabling role and in liaising with developers to embed links to local schemes), Sustrans and the Local Access Forum. Also countryside Management Schemes (CMS) for continued green access routes are likely to be through potential CMS implementation and take up of Higher Level Stewardship agreements. Enhanced grassland management to field boundary buffers. Also planning conditions in relation to development in main settlements which could incorporate parts of the link.

WHAT HAPPENS NEXT? PRIORITY / RANKING : HLS/ELS initiatives should be encouraged as a priority, as this could deliver many aspects of the overall project. Promotional projects (e.g. Green Hertfordshire - Project 6), to raise awareness of existing and new sustainable transport links (non car), will also be key. Need to get the idea of lateral link written into relevant development schemes at local level as they come forward - liaison with developers to factor in.



PERI URBAN WILDSpace - Brief description / snapshot of the project :

- A multi functional future for the historic designed landscape of Panshanger Park, linked to ongoing positive restoration of the site, and interpreting the historic resource
- Linking Panshanger Park with the strategic GI network and setting it in context through opening up access to the Mimram Valley (balanced with nature conservation interests)
- Providing strategic semi natural greenspace for East Herts and Welwyn Hatfield
- The project will be linked to conservation and enhancement of the Mimram Valley corridor which meanders through the parkland, and to additional wetland landscape creation, making use of mineral extraction to create areas of new landscape character
- Connection to Hertford via the Mimram and Lee and to adjacent former mineral sites creating a network of links (e.g. Waterford Heath, Presdales and St Mary's Lane sites)
- Also links to Welwyn Hatfield Borough River Valleys Project



FUNCTIONS MET :

access	prestige	health	ecosystems	productive	historic	sustainability	remediation	nature	experience	flood mgmt

PLANS / POLICIES / PROGRAMMES WHICH THE PROJECT CAN HELP DELIVER : Can address landscape quality and enhancement issues (contribute to landscape character assessment guidelines). Contribute to the quality of landscape and LCA objectives by restoring areas of fragmented landscape character and interpreting/enhancing historic landscape character (Brownian Landscape). Improving access and providing links would also help meet ANG deficiencies. Providing cross district links between Welwyn Hatfield and East Herts would assist in delivering ROWIP objectives.

ISSUES ASSOCIATED WITH DELIVERY : Project will involve changes in landscape management (e.g. landscape enhancement and reinstatement while also improved connectivity delivered as capital projects through the existing minerals agreement at Panshanger Park and HLS in the Mimram Valley). Need for ongoing landowner liaison as Panshanger Park restoration progresses and for future aftercare/management. This is a key part of the process. Other issues relate to provision of enhanced signage and interpretation, both through Herts Rights of Way and Herts Highways. The project could link to the interactive green infrastructure web based map proposals (Green Hertfordshire: Project 6), which could potentially be developed and hosted, as part of a wider, multi-district project and subject to resources, with HCC and Countryside Management Service.

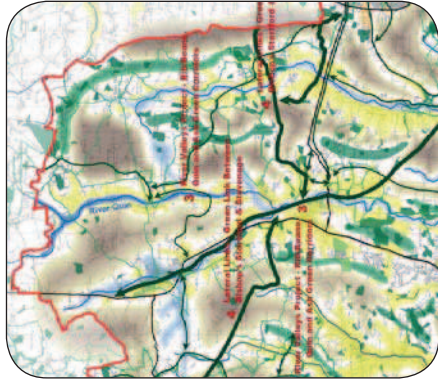
DELIVERY PARTNERS AND MONITORING MECHANISMS : Landowners and Natural England (through HLS/ELS agreements) to deliver landscape capital works working in partnership with Lafarge (to link to their ongoing programme of high quality landscape restoration works at Panshanger Park), Herts Rights of Way and the Local Access Forum. Also Mimram Valley, HCC/Landscape Unit and CMS for interactive and interpretative project (Green Hertfordshire - Project 6). Monitoring mechanisms are likely to be through the delivery of conditions associated with the minerals agreement of Panshanger Park. Take up of HLS agreements is the other key mechanism for landscape capital projects.

WHAT HAPPENS NEXT? PRIORITY / RANKING : HLS take up should be encouraged as this could deliver many aspects of the work in the Mimram Valley. Need for continued liaison with Lafarge re. phasing of works and future adaptation when their workings/restoration finishes As such priority is high. The same applies to incorporating the project into a promotional/awareness raising project (Green Hertfordshire - project 6).



Brief description / snapshot of the project :

- Accessible electronic GI map based/navigator resource
- Web based and Smartphone app (application) based outputs for easy access and to reach the widest audience, including schools and colleges
- Translate information on the GI network and new green links for people, to users
- Provide information on GI assets (landscape, habitat, historic etc) to users, to aid understanding and appreciation of the natural environment - educational resource
- Development of a series of themed walking/cycling and riding trails and routes from pubs etc and promotion of these to offer low key, 'low environmental impact' fun/recreation for all ages
- Link to other relevant programmes e.g. Transition Towns web presence - use of the interactive mapping for people to identify 'green' ways of living life - green transport routes for commuting as well as recreation, places to buy local produce etc, community events in a greenspace setting



FUNCTIONS MET:

access	prestige	health	ecosystems	productive	historic	sustainability	remediation	nature	experience	flood mgmt

PLANS / POLICIES / PROGRAMMES WHICH THE PROJECT CAN HELP DELIVER : Contribute to objectives of Local Transport Plans and ROWIP, in promoting routes for people to use for green travel. Embed most of the aims of much of the spatial planning at county and local authority level (landscape conservation in the Landscape Character Assessments for example) in the wider sub conscious of the communities who use and enjoy these environments. Recognises the full functional potential of green infrastructure (interpretation/education/appreciation of historic environment/skills development - 'soft' skills) as expressed in the Green Infrastructure Guidance.

ISSUES ASSOCIATED WITH DELIVERY : The main issue is with hosting, managing and updating a comprehensive, but relevant, usable and above all visually engaging and appealing on line resource, as well as marketing and promoting the use of the Green Hertfordshire brand/app to the widest possible audience. Need for specialist ICT, GIS and graphic design skills to help develop the package. Link to a potential GI marketing and communications strategy to launch the GI work and embed the concept. A communications strategy and user groups market research (e.g. school and youth groups) should be undertaken prior to and during development of the App. Map licensing protocols and restrictions on use of Ordnance Survey data would need to be worked around (lead in times associated with delivery of project are likely to be an issue). Need for compatibility with main Smartphone platforms. Could be compatible with traditional leaflet media using Smartphone scannable 'QR' codes with links to interactive material.

DELIVERY PARTNERS AND MONITORING MECHANISMS : The Hertfordshire Districts, Hertfordshire County Council, Hertfordshire Technical Chief Officers Association (HTCOA) landscape group, and Countryside Management Service, as well as key agencies and organisations with an interest in promoting GI (e.g. Natural England, Herts and Middlesex Wildlife Trust (HMMWT), British Waterways) and landowners of key sites within the Hertfordshire districts - potential for funding/'in kind' contributions and sponsorship. Liaison with local green groups e.g. Transition Towns. Possible private sector involvement.

WHAT HAPPENS NEXT? PRIORITY / RANKING : This is a key project to translating GI to a wider audience beyond planners and decision makers. The initial skeleton of the interactive map (which could be added to and developed as and when new information and funding became available), should be developed as a high priority project across the districts, with liaison between HCC, the Countryside Management Service and HTCOA representatives.

GI projects and cross authority connections

3.15 An essential part of effective GI delivery is a strategic, coordinated approach, to ensure that projects are resourced appropriately in terms of capital works and ongoing revenue activity. This section notes potential connections with adjacent authorities in terms of GI links and projects:

- **1. Hertford and Ware Wetland Enhancements:** Is a District specific project but will require working with parish councils and East Herts at a local level, as will all projects identified in this GI Plan.
- **2. North Harlow & Stort Valley links:** need for liaison with local authorities in Essex and Harlow Council and will require working with parish councils and local groups.
- **3. River Valleys Project – Lee, Stort, Rib, Beane, Quin and Ash:** need for links Welwyn Hatfield Borough, Harlow Council and also with local authorities in Essex.
- **4. Lateral Links – green link between Bishop's Stortford and Stevenage:** Links with Stevenage Borough Council and local authorities in Essex, particularly in relation to strategic links
- **5. Panshanger Park and Mimram Valley Greenspace:** Links with Welwyn Hatfield Borough through liaison with Lafarge and local groups and Parish Councils

3.16 In addition, delivery of the objectives of a number of the action zones described earlier in this section, will require cross authority and cross county links. For example the Wetland Habitat Zone links to Bedfordshire, whilst the Woodland Enhancement Zone requires links with Dacorum, Welwyn Hatfield and Hertsmere Boroughs (and with the latter two LPA's in particular to help deliver community forestry aspirations set out in the Watling Chase Community Forest Plan).

3.17 Account should also be taken of parallel GI projects in adjoining Hertfordshire authorities, e.g. the River Valleys Project in the Welwyn Hatfield Borough Green Infrastructure Plan, which could link to the Panshanger Park and Mimram Valley Greenspace Project. Also the Lateral Links Project which provides strategic links to Stevenage Borough Council and local authorities in the Green Arc Green Infrastructure Strategic Plan.

3.18 In addition, two of the projects in this plan should also be cross referenced with proposals contained in the county wide Strategic Highlights Green Infrastructure Plan (also referred to as the Strategic Plan). Project 3 forms part of the Thames Tributaries River Valleys and Corridors project in the Strategic Plan. Project 5 also relates to strategic proposals for the Mimram Valley.

4 Linking the green infrastructure proposals to local spatial planning and development management

4.1 It is intended that this Green Infrastructure Plan will form part of the evidence base for Development Plan Documents (DPDs) in the Local Development Framework (LDF) and for green infrastructure issues to be included and addressed in the Development Plan Documents. In order for any **future** policies that deal with green infrastructure to be found to be 'sound' when going through public examination they will have to comply with the three tests:

- To be consistent with National Policy; a green infrastructure approach is clearly advocated by national policy.
- To be justified; evidence needs to be provided to prove why it is justified for there to be a green infrastructure policy (why something is being proposed and that there is a problem or a need)^{ix} (see **sections 2 and 3**).
- To be effective; where a policy proposes tackling a green infrastructure issue there is a need to ensure that the mechanism for tackling the issue will be effective and that there is some basis for taking this course of action.

4.2 The tests of soundness point to the need for a clear link between policy formulation and the evidence that has been gathered.

4.3 PPS12, the Planning Inspectorate^x and the Planning Advisory Service (PAS) all give more detail on what is meant by effectiveness and the Green Infrastructure Plan has sought to ensure that all these aspects have been addressed through the development of the Plan. The proposals developed in this Plan have been proofed against other relevant plans, policies and programmes. The Green Infrastructure Strategies and Plans of neighbouring authorities have been reviewed to ensure consistency between this Plan and those of neighbouring authorities. A robust and transparent methodology has been used to ensure that proposed solutions are clearly linked to addressing issues and needs identified in the evidence base. A workshop and consultation with delivery partners has ensured that proposed solutions (**section 3**) are deliverable, flexible and that potential delivery partners are identified. Suggestions for monitoring have also been included in the Plan.

4.4 The key findings of the Green Infrastructure Plan that are relevant to planning policy, are set out here. This will aid plan makers, those assessing the plan (SA/SEA practitioners) and consultees in successfully embedding green infrastructure into the DPD process.

Evidence Base

4.5 The Green Infrastructure Plan is to be included as part of the evidence base for the LDF. There may be benefits to including or referring to parts of the evidence gathering and analysis undertaken for this Plan in other LDF supporting documents such as Sustainability Appraisal baselines. The following may be useful:

- An overall justification for following a green infrastructure approach is provided in **section 1**.
- Background information on environmental character can be found in **Appendix 2**.
- Key green infrastructure issues are set out by function in **section 2** and **Appendix 3**. These issues should be used by plan makers, SA practitioners and consultees to identify what the broad green infrastructure (and environmental) issues are in the District.
- The assessment of need for green infrastructure is given by function in **section 2** and **Appendix 3**.
- **Section 3** sets out the proposed green infrastructure vision, network and supporting projects. This may be useful for plan makers when they are developing policies, and for SA practitioners and Consultees when reviewing policies to help ensure options have been presented that take full advantage of potential opportunities and are most likely to help solve current and future problems.

Core strategy

4.6 Key GI points for the Core Strategy to take into consideration are:

- Wetland enhancement and sustainable water management in the Lee, Stort, Rib, Beane, Quin & Ash Valleys, making 'space for water' up and downstream of the main settlement pinch points;
- Increased green links to the countryside from high density settlements in particular Hertford and Ware, & Bishop's Stortford, seeking enhanced links along the river valleys network, where these do not conflict with nature conservation interests;
- Improved strategic links with adjunct District/County (such as the Lateral Links project), facilitating greater levels of car free access;
- Using green infrastructure to contribute positively to landscape character enhancement, restoration and linkage (e.g. areas for farmland, grassland restoration and woodland enhancement as shown on **Figure 3.1**);
- Green infrastructure to interpret and appreciate significant cultural heritage assets (e.g. Henry Moor cultural trail and reinstatement of Roman Road);
- Context, sense of place and local distinctiveness: Recognition, conservation and enhancement of the key assets of river valleys, woodlands, grasslands and commons.

DEVELOPMENT MANAGEMENT

4.7 The green infrastructure zones and component projects identified in **section 3** form a basis for evaluating future development proposals against the proposed green infrastructure network, and to ensure that they contribute to the desired environmental outcomes and functions. A model process for ensuring that green infrastructure is embedded in development management, and that appropriate account is taken of green infrastructure recommendations, is set out in **Figure 4.1**. A standardised approach to the design and implementation of a generic green infrastructure development project is shown in the central column of this Figure, with respective responsibilities of the applicant and the District Council, as they relate to GI, shown to the left and right hand sides respectively.

4.8 **Figure 4.1** is designed to assist Development Management officers and planning applicants to ensure that green infrastructure is embedded in the scheme design from the outset, as part of the development process. The diagram can be applicable to any scale of proposed development. The starting point is to identify the green infrastructure zone or elements in which a specific site lies and whether it relates to, can contribute to or affects any proposed projects in this GI Plan. Reference should be made to the key messages for the relevant projects e.g. the important green infrastructure assets and links to conserve and enhance, and this should be used as a starting point for site

planning and design – a ‘greenprint’ or a green infrastructure led basis for masterplanning, to ensure that green infrastructure assets are considered and protected from the first.

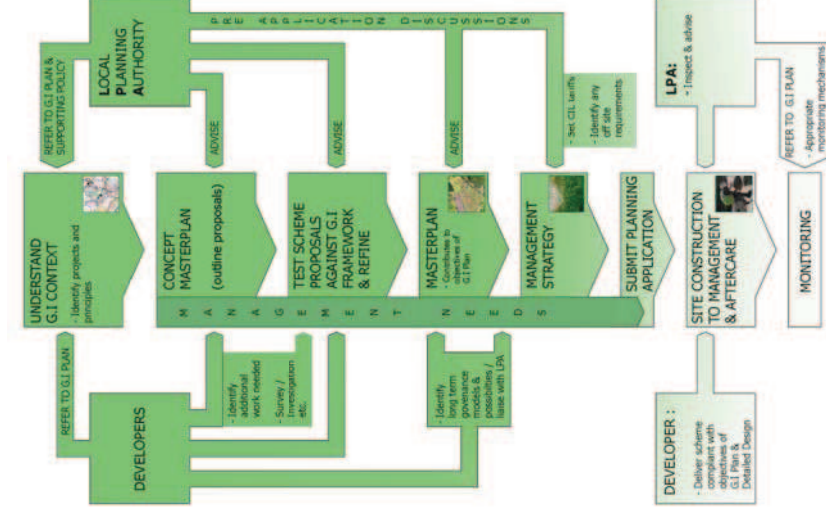


Figure 4.1: Embedding GI in Development Management

NEXT STEPS

4.9 The following steps/alternatives are recommended in order to take forward green infrastructure delivery within the District:

- Creation of a dedicated **Green Infrastructure Delivery Officer** role at County level (subject to resources – this may be a desirable long term aspiration);
- **Taking the GI Plan forward in the District through existing mechanisms** (Hertfordshire Environmental Forum) and with assistance and advice from the Countryside Management Service;
- Attendance at and participation in a potential new Hertfordshire wide/cross district **GI Delivery Panel** (potentially linked to HTCOA's landscape group and other stakeholders such as the Herts and Middlesex Wildlife Trust, as well as the Parish Councils). Management of this panel could be commissioned from a relevant commercial organisation such as Groundwork or other GI implementation consultancy. This should have a practical focus in securing on the ground delivery.
- 4.10 Whichever approaches are selected, clearly there will be a need for close partnership working with other organisations with parallel interests and objectives (East Herts in an enabling/facilitating role, liaising as appropriate with adjacent Districts and Boroughs). By doing this and through intelligent use of existing mechanisms and

processes, a SMART approach to GI delivery could be achieved in the District, as described below. Possible future responsibilities in relation to green infrastructure delivery, whether through a Delivery Officer or through participation in a Delivery Panel, at District level, are as follows:

- **Actively promote green infrastructure**, liaising with relevant members of the Local Strategic Partnership, to ensure that green infrastructure contributes to the objectives of spatial planning;
- Preparation and implementation of a **Communications Strategy for green infrastructure** in the District, to raise public awareness of the concept. This should link to the interactive GI mapping/web/app based project described in **section 3** (Project 5: Green Hertfordshire). Focus on projects with a community emphasis, to engender greater public support and ownership, as well as embedding positive informal management/stewardship, in addition to any more formal management structures identified;
- **Advise and assist a nominated green infrastructure 'champion'**, (ideally a Council member, to ensure greater potential for 'buy in' from members);
- Provide constructive advice to the Council on GI delivery, considering the points below:

- **Homes Bonus).** Cross refer to the work of Sustainability East for embedding sustainable development considerations in relation to business development^{xi};
- Ensure that developers and others bringing forward green infrastructure not only take account of the key messages in this GI Plan, but that they also identify sustainable, resourced mechanisms and models for long term governance to deliver design intentions and desired environmental outcomes;
- **Make appropriate links with future delivery and funding partners** identified in the projects in **section 3** of this GI Plan, in relation to **co ordination of funding bids**, and also in **making links with adjacent authorities** for projects on authority boundaries/in considering adjacent District GI projects which could impact on/benefit East Herts;
- **‘Grass roots’ delivery:** Continue to develop links with Parish councils and relevant community and volunteer groups such as the British Trust for Conservation Volunteers (BTCV), allotment societies, local schools (tree planting activities) and existing Friends Groups and formation of new Friends Groups, where appropriate. Also potential for formation of **local green groups** working with a Delivery Officer/panel. As part of this grass roots approach, ensure that reasons for changes to greenspace management etc are translated to the community (perception and awareness raising);

- **A checklist** for evaluating development proposals in terms of GI and against the components of the GI network in this GI Plan. Possible components of such a checklist are set out under ‘Potential future work’, at the end of this section;
- **Consider potential for further work** and additional studies to bring GI forward, including more detailed GI planning work, as highlighted at the end of this section;
- Identification of constraints, challenges and potential conflicts of interest in relation to practical delivery, making early links with appropriate bodies (e.g. in relation to ecological advice, surveys and flood risk etc).
- **Land ownership liaison and negotiation** (this is a key stage);
- Where appropriate, as part of liaison with landowners **seek to encourage take up of grant schemes** which could contribute to the aims of the GI Plan e.g. agri-environment and woodland grant schemes;
- As a consultee, comment on relevant planning applications through the pre application and application processes, using the proposed GI Network;
- **Liaise with developers early in pre application stage**, ideally at site acquisition, so that GI is factored into schemes from the start, and as part of section 106 contributions (identification of the proportion of GI to be met through the Community Infrastructure Levy - CIL, section 106 and through the local authority New

- Liaise with the relevant Local Strategic Partners, **noting and using where appropriate existing processes** that may be of relevance to GI delivery, for reasons of efficiency and avoiding duplication of work;
- Develop appropriate consultancy briefs for masterplanning and detailed design services in relation to key GI projects, making appropriate reference to key messages in the GI network and projects at **section 3**;
- Create an audit trail of appropriate monitoring mechanisms in relation to green infrastructure delivery, making use of existing tools such as site inspections to adoption, and visitor surveys. This will help monitor performance of the green infrastructure proposals in relation to the environmental functions, to inform and refine future iterations of the spatial plan for East Herts;
- With the Council, convene regular updates, meetings and opportunities for progress reporting during the life of the GI Plan and wider spatial plan, to disseminate results, good practice and lessons learned (e.g. with reference to good practice case studies, such as Broxbourne Woods and Amwell Quarry regeneration).

POTENTIAL FUTURE WORK

GI checklist for development management decisions

- 4.11 In addition to the general pointers shown on **Figure 4.1**, this could cover the following subject areas:

- Sense of place: Including historic character and landscape management;
- Nature conservation enhancement and management;
- Sustainable resource management and climate change adaptation;
- Healthy and cohesive communities including access for all;
- Choices for responsible travel;
- Sustainable design and construction techniques and specifications.

GI Design and Delivery Guide

This could take the form of accessible, concise, written and illustrated design principles aimed at developers and to inform Development Management Officers in evaluating planning applications in terms of green infrastructure. The aim with such a document should be to ensure that the most positive consideration is given to GI planning, design and management, from the outset of the development process.

4.12

GI Supplementary Planning Document (SPD)

It may be desirable for the District (possibly with adjacent authorities) to consider production of a green infrastructure SPD, although this must not detract from the wider need to embed green infrastructure more generally within the LDF, the Core Strategy and relevant

4.13

policies. It may be more useful to include aspects of the Green Infrastructure Plan and potential future work within other SPD (e.g. Planning Obligations/Developer Contributions, or a Design SPD).

More detailed and local level GI planning work

- 4.14 This is a strategic level GI Plan and more detailed and 'site specific' GI planning work, drawing on this plan, is likely to be required within the District, particularly as growth locations and areas of change become more fixed.

Outward facing projects to 'launch' the GI concept

Interactive/web/app based mapping project – GI for people – 'Green Hertfordshire'

- 4.15 This is described in the 'Green Hertfordshire' project (Project 6) at **section 3** of this GI Plan. This project could also be linked to promotion through established greenspace events in the District, such as those held in Hartham Common. Another focus of the project could be to promote local suppliers and producers (local food).

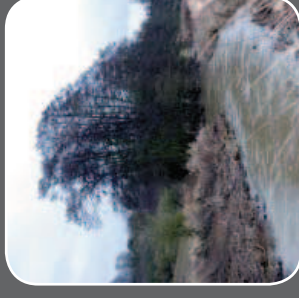
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- ⁱ <http://www.hertsdirect.org/infobase/docs/pdfstore/giframework.pdf>
- ⁱⁱ <http://naturalengland.etraderstores.com/NaturalEnglandShop/NEI176>
- ⁱⁱⁱ **NEI176, Op Cit**
- ^{iv} Natural England/The Landscape Partnership **Analysis of Accessible Natural Greenspace Provision in Hertfordshire**
- ^v Source: V4C Project. Study produced for Hertfordshire County Council
- ^{vi} <http://www.hertsdirect.org/libslisure/heritage/landscape/hlca/>
- ^{vii} Groundwork Hertfordshire 2004 **Trees Against Pollution: A Strategy for Tree Planting and Air Quality**
- ^{viii} Liz Lake Associates 2009 **Landscape and Visual Impact Assessment: Re Restoration Sites - Hertfordshire**
- ^{ix} Planning Advisory Service 2008 **Local Development Frameworks: Evidence Base**
- ^x The Planning Inspectorate 2008 **Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance**
- ^{xi} http://www.sustainabilityeast.org.uk/index.php?option=com_content&view=article&id=17&Itemid=22



EAST HERTS GREEN INFRASTRUCTURE PLAN APPENDICES

Prepared for East Herts Council
by
Land Use Consultants

March 2011



LUC SERVICES

Environmental Planning

Landscape Design

Landscape Management

Masterplanning

Landscape Planning

Ecology

Environmental Assessment

Rural Futures

Digital Design

Urban Regeneration

Urban Design

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1 Stakeholder consultation record: Stakeholder event, East Herts Council, 27th January 2011

4993 East Herts GI Plan: Stakeholder event, 27th January. Record of discussion and LUC responses (in bold)

Stakeholder workshop report	<p>The workshop was held at EHDC's offices on 27th January from 1.30-4.30pm, facilitated by Bryan Thomsett, Jenny Pierce and Ian Sharratt (EHDC) and Andrew Tempny and Fearghus Foyle (LUC). Attendees were split into 5 groups and considered three subject areas/exercises to inform development of the GI Plan, following a short introduction to the work by LUC. Exercises considered: Visioning, Proposals and Projects and Delivery. Findings and LUC responses (where appropriate) are summarised by group below.</p>
Group 1: Visioning (LUC responses in bold)	<ul style="list-style-type: none"> • We should protect areas that are not yet protected. Yes, agree with principle • Identify all protected landscapes (other than Panshanger) LUC to check • Too specific – provide examples Yes • Define 'protected' • Separate routes for cyclists Detailed consideration for future work • Why particularly Beane Valley The importance of all river valleys is recognised and will be referenced • More thought about, e.g. linking neighbouring strategies (cross-county) Cross district links are identified in parallel • Herts district GI work being undertaken by LUC <ul style="list-style-type: none"> - e.g. North Herts / Broxbourne - re-word – adjoining districts • Identify SSSI locations to avoid conflict from increased access Yes, these have been identified as part of the functional mapping undertaken for the project • Biodiversity should be stressed more as a key message Can emphasise more • Are other documents linked e.g. Living Landscapes? Yes • What does low key and informal mean? • Conservation of 'heritage' landscapes not mentioned, e.g. historic landscape character. HLC is being referenced in the GI Plan Report and the functional analysis • Wider assets? • Growth points – ensuring new developments are designed to link with and enhance green infrastructure. Agree with principle

<p>Want to see:</p> <ul style="list-style-type: none"> • Need for good evidence base This has been provided in document review and functional analysis which will form part of the full GI Plan report • Could maps be made available online to see more detail This is not within the contract scope. The GI proposals map has been circulated by EHDC for information • External river valleys “outside” of the map boundary LUC to check • More emphasis on “quality of place” – v important to residents. Can emphasise more 	
<p>Group 2: Visioning</p> <ul style="list-style-type: none"> • Stevenage and Lee Valley (the natural place rather than the park itself) links Agree, these form part of the network - Promote as an asset separate to Lee Valley Regional Park. Agree with promotion of the valley itself in principle • Ownership – shared ownership with council and stakeholders • Buntingford (all urban areas in the district) <ul style="list-style-type: none"> - Urban envelope - Enhance / maintain rural character Agree - Urban / rural links – reinforce importance of countryside Agree • Land Use Recognise its importance as a key component of GI and planning for the future <ul style="list-style-type: none"> - Wider land use issues for the future - Water / water quality will be a significant driver in land use Agree • GI should inform development and not the other way round. Agree • Access – promotion of existing and improvement Incorporated into GI proposals • Education Agree with importance and need for awareness raising <ul style="list-style-type: none"> - Rights of way - Farming – promotion • Identity / place / setting – crucial to development proposals Agree • Belonging Agree <ul style="list-style-type: none"> - Ownership - Localism - Shared ownership – Council, EH & Stakeholders 	

<ul style="list-style-type: none"> • Urban – rural links Yes • Development <ul style="list-style-type: none"> - GI informs development plans Agree with principle - GI evidence base for development • Access – promotion of existing and additional routes Agree • Taking forward <ul style="list-style-type: none"> - Agri-schemes/HLS Agree - Section 106 Yes, agree - No longer publicly supported route to delivery - HLS • Education Yes, very important <ul style="list-style-type: none"> - RoW - Farming – promotion (agri-environment) - Those in receipt of funding should be reminded • Place / setting - ensure landscape is a primary element in deciding development Agree with principle. GI forms a part of that process 	
Group 3: Visioning	
<ul style="list-style-type: none"> • Buffering of communities – e.g. Stevenage and the way it accesses wider resources. Could this be stronger? More on requirement of community LUC to check • Vision is quite comprehensive for this level/spatial scale • ‘How to get there?’ A point for consideration of delivery • Sensitivity of landscape north of Harlow Agree this is important in terms of GI assets • Links with Stort Valley & Harlow area GI work Yes • Joined up approach – linking to project delivery at Stort Valley Agree with principle • Good to express more clearly along Lee Valley • Farmland: more on local food initiatives Agree with principle • Rural tourism • Value of farmland for linked habitats Importance has been identified • Linking HLS areas Agree with principle 	

<ul style="list-style-type: none"> • Link to other activities – skills / training etc Yes, agree with principle • Need for co-coordinating role – (CMS?) e.g. how to achieve projects. Land ownership & Parish councils are key. Agree • Partnership working irrespective of development. Agree with principle
<p>Group 4: Visioning</p> <ul style="list-style-type: none"> • Are we acting for and on behalf of London spreading north using Herts GI assets or vice versa? – Providing a network of open space within Hertfordshire with links to and from adjoining districts. GI aims to remove boundaries • Barge over-crowding on the Stort • River network is a ready-made GI network Agree • Needs to be a link between development extraction levels harming the very environment they want to take advantage of • Importance of Broxbourne & Herts woodlands NNR Signpost to strategically important assets as appropriate • Increasing corridor effect for wildlife / plants migration – issues getting land owners to sign up, particularly funding solutions (Climate change) • Landowners funding • Links to 'localism' to maximise asset use Agree with principle – parishes and local community involvement in future • Needs to be actioned – not another study on the shelf – need to give much greater priority to GI Agree with principle. GI Plan will identify initial steps to begin bringing the network forward • Needs more reference to biodiversity. LUC to check
<p>Group 5: Visioning</p> <ul style="list-style-type: none"> • Sense of place Agree with importance <ul style="list-style-type: none"> - Rural once out of town - Physical barrier around edge of town - Happy with consultation proposals • How are we going to link the wooded areas? Farms already encouraged to do this • What about the concept of “landscape view” as GI Unsure of meaning • To add: <ul style="list-style-type: none"> - Act to improve, enhance information dissemination esp. Permissive Rights of Way – (in conjunction with Herts Rights of Way Improvement Plan). RoW and Herts RoWIP considered as part of document review undertaken for

the project. Agree that promotion and awareness raising are key principles for GI	
Group 1: Proposals and Projects	
Project 1: Kings Mead	<ul style="list-style-type: none"> - Hartham wetland – care in research? Unsure of the meaning of this - Would like Rivers Nursery mentioned specifically as historical site. This may be too detailed for a strategic vision
Project 2: More emphasis on enhancing and protecting the area and its rural environment. Recognise and reference as appropriate	
Project 3: Why Stort Valley not mentioned? Lee also Agree, will add	
Project 4: Roman Rd East of Stevenage would potentially impact on archaeology – needs assessing Agree	
Project 5: What is envisaged? LUC to check	<ul style="list-style-type: none"> - Link to wetland enhancement – make clearer. - Emphasise historic environment
<ul style="list-style-type: none"> • Could be more a specific project to identify and regenerate the ‘lower quality’ landscapes? LUC to check • Why not mapping Entry Level Stewardship schemes This did not form part of the specification for the contract • Mention traditional orchards (BAP) Yes, account has been taken of this in the functional analysis 	
Group 2: Proposals and projects	
Project 1	<ul style="list-style-type: none"> • King’s Mead – Amwell Quarry • Greening River Lee around Hertford and Ware • Encompassing a broader area to include a number of different bodies to bring projects forward • Herts Civic Society
LUC to check/take account of the above, as appropriate	
Project 2	<ul style="list-style-type: none"> • Scale / size of projects • Stort valley / Harlow GI Plans act as an overall vision • Investment in Harlow North countryside

<ul style="list-style-type: none"> • Lack of funding • What do zones mean – compulsory consideration or optional • Green belts – results in overcrowding in urban areas <p>LUC to check/take account of the above, as appropriate</p>	
<p><u>Project 3</u></p> <ul style="list-style-type: none"> • Beane – runs dry • EA in consultation with CC to reduce abstraction • Stort is over licensed • All Herts Rivers over abstracted • Programming money to reduce abstraction • Habitat quality & habitat management • Run off mgmt • Tributary mgmt - Beane in particular • Physical habitat & farming mgmt • Developing suitable industries along river valleys <p>LUC to check/take account of the above, as appropriate</p>	
<p><u>Project 4</u> (grassland mgmt)</p> <ul style="list-style-type: none"> • Lateral links Agree 	
<p><u>Project 5</u></p> <ul style="list-style-type: none"> - Panshanger - Mineral abstraction - Designated mineral sites (future sites allocated in the Minerals Core Strategy) – what happens in the in-term? E.g. can they be used as part of GI network until extraction commences? - Long term ambition for mineral sites 	

<p>- Abstraction issues</p> <p>LUC to check/take account of the above, as appropriate</p> <p>Group 3: Proposals and Projects</p>	
<p>Project 1: Link to existing work being done in Hartham Agree, reference this</p> <ul style="list-style-type: none"> • Land ownership an issue Agree • Links to others e.g. Beane an opportunity • Hertford Green Fingers study Make reference as appropriate • Information is a key part to “translate why GI assets are special” Agree • Support for idea of links to Amwell NR + Lee Valley Regional Park • Expand on the good people links of navigation • Explore links along valley via nature reserve LUC to check • Possible link along A414, but many barriers – railway. • BWB – works on links at Roydon. Potential further work on Sustrans route • Also at Bishop Stortford – opportunity for good link in town centre where river un-canalised (Grange Paddocks) LUC to check. Could this also link to 2020 vision for Bishops Stortford? (some towpath works being delivered to canalised part). Make sure gaps are joined for users of network Agree with principle • To do rest of towpath is a key aspiration of the Stort Valley Plan, but no funds to deliver • Need for signage / interpret – action. Awareness raising is absolutely key Yes, agree 	<p>Project 2: Pole Hole (mineral ext.) & ex Harlow Town rubbish tip. Key opportunity on floodplain site and restore higher ground to farmland Could be assessed further at a later, more detailed stage</p> <ul style="list-style-type: none"> • Therefore need to formalise as part of valley • Other aspects of project cover points well • Land ownership + negotiation key Agree • Wording sounds a bit “Harlow North”? – could it be cast it more in Eastwick / Gilston perspective (local resonance) Agree, will check • Interesting idea re wider landscape sculpture trail • Potential “tourism angle” – local business input? Agree, an opportunity

<p>Project 3: Ecosystem services - should link to vision, e.g. what landscape and habitat provide for people (flood risk management). Same issues re land ownership. Agree</p> <ul style="list-style-type: none"> • Link to existing Beane Valley trail / walk (Walkern etc) – Hertford (1996 leaflet- needs updating!) • Beane arable but some significant HLS in the valley <p>Project 4: Principle sounds good</p> <p>Project 5: Project is good but how will it be delivered? GI Plan will identify initial thoughts and recommendations re: delivery of the network. Links with Lafarge will be key for this project in future</p> <ul style="list-style-type: none"> • Sounds good if phased and more use of quiet roads also. <p>Panshanger</p> <ul style="list-style-type: none"> • Good to have woodland and landscape connections • Links to phased restoration of site • What about management – grazing (viability)? <p>Project 6: Non spatial project</p> <ul style="list-style-type: none"> • App idea sounds sensible / appropriate • Current/relevant idea a cost effective proposal for which there is broad support • Potential for communities to come together to share info, in addition to hosting by tourism board • Good for awareness raising • Potential to act as “portal” for different interest groups Agree with principle • Educational value – enhanced understanding / perception. 	<p>Group 4: Projects and Proposals</p> <ul style="list-style-type: none"> • Bias towards wetland projects Landscape as a whole has been analysed however, East Herts water courses are a prominent landscape feature and clearly form a key part of the strategic GI network • Need natural history societies input A point for future engagement • Perhaps group river valleys / wetland projects into an overarching project leaving room to accommodate woodland and other projects LUC to consider
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<ul style="list-style-type: none"> • Add Mimram to Panshanger Park to link East Herts to Welwyn Hatfield Agree, this proposal has been developed for the strategic County GI Plan and should cross reference to this district scale GI Plan – proposal can be amended to include • Stort sewerage issues preventing floodplain from functioning properly as it would harm valley biodiversity • Is the west at risk of being missed due to focus on river valley Appropriate promotion and use of river valleys can impact positively on the GI network • Add a project on farmland and stewardship schemes LUC to check, possibly more an overarching point re: delivery • Increase the involvement of voluntary organisations (Natural History Societies) Agree with principle, for future engagement • DEFRA – funding for environmental stewardship schemes – 10 yr revenue & capital <ol style="list-style-type: none"> 1. Wetland and river valleys 2. Woodland 3. Farmland (environmental stewardship) 4. North of Harlow 5. Lateral links 6. Panshanger Park <ul style="list-style-type: none"> • Need to draw out use of renewables in new developments Agree with general principle 	<p>Group 5: Projects and Proposals</p> <p>Project 1: Hetford Ware</p> <ul style="list-style-type: none"> - Possible conflict with public access / wildlife Principle of project is about striking appropriate balance between such interests and avoiding conflict - Need for more 'permissive paths' as preferred by farmers / landowners - Agree with project generally - 'Natural' approach to flood management prevention important. Need to increase vegetation to slow run off. Reduce canalisation. Agree with principles <p>General:</p> <ul style="list-style-type: none"> - Need for more co-ordination between separate landowners and stewardship scheme
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<ul style="list-style-type: none"> - Problem now that access is missing from Stewardship Schemes. <p>Agree in principle with the above points</p> <p>Project 2: North of Harlow</p> <ul style="list-style-type: none"> - 'Legibility' What is this concept? A more detailed explanation will be given in GI Plan Report - Make sure 'access' is considered at the start of any development, so public access is available to surrounding countryside <p>Agree with principle</p> <p>Project 3: River Valleys – R. Beane</p> <ul style="list-style-type: none"> - Too much abstraction from River Beane – this causes massive damage Agree, an important issue - There is no more water from aquifers - All waste water is lost from the catchment as ends up in R. Lee - Climate change making this a more pressing issue Agree <p>Project 4: Lateral Links to Bishops Stortford</p> <ul style="list-style-type: none"> - Strongly support the proposal east-west link - Conflict with some future development opportunities; whilst conversely it may benefit others in the rural economy This need not conflict as link can work with and around any future development, if principle of link is established early enough <p>Project 5: Panshanger</p> <ul style="list-style-type: none"> - Agree with proposals <p>Project 6: Non-spatial project</p> <ul style="list-style-type: none"> - Need more awareness of water management and use. East Herts a very dry area. - Need for web based register of Permissive Paths, linked with HCC existing web site of Rights of Way - Agree with concepts, especially on education / local produce. - Awareness with regard to litter & dog mess A micro level consideration, although use and misuse issues should be recognised in greenspace management
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<p>Group 1: Delivery</p> <ul style="list-style-type: none"> • Parish Council – putting link on Parish websites, path, workgroups involvement in access issues in Standon. Strongly agree with promotion and publicity for GI, and agree that local level engagement will be key in future • County archaeology <ul style="list-style-type: none"> - Checking evidence base - Advice for projects re. archaeology Agree with principle, although this would be a focus for later, more detailed and site specific proposals/work • Consultation at an early stage Yes • RSPB – expertise on land management • North Herts <ul style="list-style-type: none"> - Learning experience, joint working Agree • Rivers Nursery <ul style="list-style-type: none"> - Objectives re living landscapes etc - Supportive role - Herts Orchard Initiative (link) 	<p>Group 2: Delivery</p> <ul style="list-style-type: none"> • Buntingford (other town plans) • Two levels <ul style="list-style-type: none"> - Delivery of vision - Delivery of projects We see the two levels as linked e.g. implementation of projects on the ground will be able to help deliver the vision • Living landscape • Agri-environment <ul style="list-style-type: none"> - PR exercise - Public money been spent on the ground – utilise it • Showcasing existing work to bring forward additional projects Agree with principle • Harlow local initiative – good example of localism • Delivery bodies <ul style="list-style-type: none"> - Partnership
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- Stort Valley
- Project leader / mentor
 - How?
 - Ownership of plan?

<p>Group 3: Delivery</p>	<ul style="list-style-type: none"> • Identify partners to deliver objectives / projects Agree with principle • Portfolio of projects – strategic approach Yes, agree • Need coordinating role (sub groups) Agree with principle • Resource dependent. Need someone with overview. Yes, agree, as per above point • Prioritisation and costing Agree, early consideration of prioritisation is part of the work. More detailed feasibility studies and costings will be required as a later stage, although broad cost range can be identified to help guide future investment • Use of existing mechanisms as well to help mobilise e.g. Herts Env't Forum Agree • Link to CMS / HMWV • Scope for delivery panel? Idea should be referenced as an option • Role of CMS in 'doing role' (cf. North Herts) Agree, a key player • Another tier of work? – Delivery plan? – gap between GI strategy and on ground delivery Yes, key future stage after this study • Cluster projects together (strategic) = larger funding bid (cf. Stort Valley) Agree with principle • Factor in staffing costs Agree with principle for future detailed costings • Fully costed project plans advantageous for tie in re S.106 (link to Planning). Developers need to factor GI costs into "bottom line" Agree with principles • How to make it happen. Identify interested parties • Look at other successful models • Identification of resources (& capacity) to deliver / lead. • HCTOA <ul style="list-style-type: none"> - Consider possible GI officer appointment? Idea is interesting if resources were available - Could they oversee strategically? • Need for & ability for GI to happen irrespective of development • Parish plans inc. GI element. Could parishes enable through liaison with CMS? Reference
<p>Group 4: Delivery</p>	<ul style="list-style-type: none"> • Need to be opportunistic – don't ask, don't get • Identify key landowners and opportunities Key principle for future work

<ul style="list-style-type: none">• Willingness to participate• Funding – where from / how to spend –• Natural England: Key issues/interests<ul style="list-style-type: none">- Landscape- Environmental Stewardship Schemes- Higher Level Schemes• Partnership working<ul style="list-style-type: none">- Lafarge e.g. at Panshanger & HCC- Commercial – S.106- County & District- NE, EA, Forestry Commission, HMWT, FWAG (Farming and Wildlife Advisory Group), HBRC, CMS, Ground Work.- Local groups – Green space groups / community groups- Farmers Markets use / support local producers• Need to keep at it as landowners change• Capture Development Gain S.106 <p>LUC to take account of the above, as appropriate</p>		
Group 5: Delivery		
<u>Project</u>	<u>Who</u>	<u>How + mechanisms</u>
Project 1; Hertford / Ware	Existing groups in place	Need to link with landowners / developers
Project 3: River Valleys	Andrew Bott	Political pressure & coordination with water company / EA.
<u>General points</u>		
1. Farmers / landowners <ul style="list-style-type: none">- How to help deliver. Need subsidy. Arable land use is key use in East Herts. Grain prices high.- Council – can help with coordination between landowners – get them together. Encourage green infrastructure ideals to be considered in HLS & ELS & cross compliance at start of these agreements Agree with principle		
2. Adaptation to climate change <ul style="list-style-type: none">- Landowners will be reactive		

3. Need to keep communities moderate in size so people can walk to 'town centre'.

2 Summary findings from the document review

This section also includes messages useful for future, local level GI planning, and which go beyond the scope of this high level GI Plan. Where relevant, appropriate projects and proposals in the GI Plan (section 3 and **Figure 3.1** in the main report) are also identified.

KEY MESSAGES FROM THE LITERATURE REVIEW, BY THEME

Access and recreation (open space)

- 2.1 The following documents were reviewed: *East Herts Open Spaces Strategy*, *East Herts Council*, 2009, *East Herts PPG17 Audit and Assessment*, 2004, *Hertfordshire Rights of Way Improvement Plan*, 2008.
- 2.2 The open space strategy identifies extensive open space provision in East Herts. Of the 2117 acres in East Herts, this includes 986 hectares of semi-natural open space which accounts for over 30% of the landscape. East Herts has developed quantity provision standards for publicly accessible open space, most of which are met, with the exception of provision for young people and children, where there are deficiencies identified at Hertford and Buntingford. A number of open spaces across the District have also been identified for quality improvements.

- 2.3 There is good overall provision of public rights of way and the network is extensive, but disjointed in places, where a need to improve off-road cycle access, particularly around Bishop's Stortford, is required. Roads and other barriers affect the use of rights of way in many parts of the District, particularly in close proximity to larger settlements.
- 2.4 GI opportunities in **section 3** of the GI Plan which aim to improve access to open space include River Valley Links and Lateral Links across the District which aim to create an a network encompassing the entire District with strategic links incorporated. These broad principles are expressed in **projects 3 and 4** and on **Figure 3.1** in the GI Plan.

Landscape character, experience, settlement setting

- 2.5 The following documents were reviewed: *Landscape East/Natural England*, 2009: *East of England Regional Landscape Framework: Landscape Typology Final Report*, HCC, 2001: *Hertfordshire Landscape Character Assessment*, EHDC *Landscape Character SPD*, CPRE, 2007, *Intrusion Mapping*, CPRE, 2000, *Night Skies Mapping*.
- 2.6 The landscape context of the main settlements in East Herts (Hertford and Ware, Sawbridgeworth, Buntingford and Bishop's Stortford) is a relatively simple and unified, intact and strongly rural, often tranquil chalk landscape of lightly settled Wooded Plateau Farmlands, cut by a network of well defined Wooded Chalk Valleys. The

wooded plateau farmlands are characterised by small scale, traditional settlement and have a gently rolling landform, with blocks of ancient broadleaf woodland, often connected by a strong network of hedgerows, imparting an intact, historic feel to the landscape. The chalk valleys generally have a quiet character, and in some instances definition is provided by wooded valley crests and adjacent plateau woodlands. A number of the chalk valleys are associated with the Valley Meadowlands of the principal river valleys and chalk streams which cut the District, such as the Beane, Quin, and Rib. The principal nucleated settlements are often located in larger valleys, such as the Stort. Other aspects of the local landscape experience include intact and larger scale arable plateau farmlands and a network of parkland estates and areas of designed landscapes overlooking the valleys (e.g. Gilston in the Stort Valley).

- 2.7 Key issues relevant to green infrastructure are fragmentation of the parkland estates and their settings due to mineral extraction, agriculture and development, the severance of intimate valley landscapes such as the Stort and the Ash by transport corridors, and exposed settlement edges which jar with landscape character.
- 2.8 Key opportunities are to use the parklands as primary foci for the GI network and to enhance their setting and understand such landscapes through interpretation. Historic gems such as Gilston and Pishiobury and (with ongoing positive restoration) Panshanger will form primary components of the GI network, as will the tranquil lowland

river valleys – clear opportunities for interlinked ‘necklaces’ of landscape and habitat, threading through countryside and settlements (see **projects 3 and 4** in the GI Plan).

The historic environment

- 2.9 The following documents were reviewed: *Historic Landscape characterisation (HLC)*, *Hertfordshire County Council, 2001*; *Hertfordshire Landscape Character Assessment, Conservation Area Appraisals where available: Hertford and Bishop’s Stortford, The Hertfordshire Historic Environment Record*.
- 2.10 A rich historic landscape resource exists across the District, with some of the most intact areas of historic landscape in the county. The Historic Landscape Characterisation (HLC) has identified large scale presence of intact early enclosure field systems across the rural landscape, allied to historic parklands and designed landscapes, ancient woodland and a network of river meadows.
- 2.11 Much of the historic character of East Herts is the legacy of Roman occupation, where the landscape is crossed by a network of Roman roads such as Stane Street in Bishop’s Stortford and Ermine Street in Hertford. These should be considered key cultural assets and where accessible these should be integrated into District wide non motorised routes (see **project 4** in the GI Plan) and **Figure 3.1**. Greater accessibility to the numerous river valleys across the District and in particular the integration of the Lee

Valley with the wider landscape will be a key element of green infrastructure planning. Although the quarried sites across the district have become a key feature of the landscape over time particularly near Hertford, their restoration should be considered where their recreational functions could be better utilised – woodland and landscape linkages (see **project 5** in the GI Plan).

Health and deprivation

2.12 The following documents were reviewed: *East Herts Open Spaces Strategy, East Herts, 2009, East Herts PPG17 Audit and Assessment, 2004, Hertfordshire Rights of Way Improvement Plan, 2008.*

2.13 According to the Indices of Multiple Deprivation, there is no significant health deprivation in East Herts. In addition, there is extensive provision of open space in the District, although there are some localised deficiencies which may affect the health of the population, including lack of provision for young people and children at Hertford and Buntingford. Public consultation indicates that 1/3 of respondents had not visited an open space of any type in the last 12 months. The majority of residents also access the public rights of way network by car, and healthier, sustainable transport options should be promoted (see **project 4** in the GI Plan). GI opportunities include enhancing links to nearby initiatives, such as the Lee & Stort Valleys and Gilston Park proposals and Harlow GI Plan (see **project 2** in the GI Plan).

Functional ecosystems and flood risk

2.14 The following documents were reviewed: *East Herts Level 1 Strategic Floodrisk Assessment (SFRA) 2008, EA Thames Catchment Flood Management Plan, EHDC Landscape character SPD, Hertfordshire County Council note on drought sensitive landscape character areas.*

2.15 East Herts is hydrologically complex, cut by a network of chalk valleys (Beane, Mimram, Quin, Rib and Lee) and clay valleys (Ash and Stort), with five river valleys converging on the town of Hertford. The wide floodplains of the valleys are a key part of floodrisk management, although the clay catchments are prone to flash flooding (see **project 3** in the GI Plan for further details).

2.16 Key issues are in respect of abstraction pressures resulting from existing urban areas and potential future settlement growth, the vulnerability of the valley landscapes to climate change, and consideration of urban flooding (due to lack of space for water) where rivers flow through towns such as Hertford (see **projects 1 and 3** in the GI Plan).

2.17 Primary opportunities for the Green Infrastructure Plan are therefore to conserve, enhance and extend floodplain landscapes, to create more space for water, specifically flood storage in the event of drought. SuDS should be an integral consideration in planning any new development. This would both assist with flood storage functions and with management of run off/groundwater re charging, alleviating pressures in respect of water abstraction and therefore

assisting in conservation of landscape character and biodiversity.

Productive landscapes

2.18 The following documents were reviewed: PPG17 Audit and Assessment - East Herts Council, 2005, Natural England mapped data on traditional orchards, HLS Target Area mapping (www.natureonthemap.org.uk) and statements, Woodland For Life: The Regional Woodland Strategy For The East Of England, November 2003, East Herts Core Strategy Issues and Options Consultation Document, August 2010, Hertfordshire Low & Zero Carbon Technical Study – Final Report, March 2010.

2.19 Small areas of the District along its eastern and southeast border (e.g. Sawbridgeworth) fall within the Essex Coast and Growth Areas HLS Target Area. HLS schemes which will be supported within this area include those which seek to maintain, restore or create wet woodland or ancient semi-natural woodland (see **project 2** in the GI Plan). An opportunity therefore exists to benefit both biodiversity and the production of timber and/or biofuels by tree planting, support for natural woodland expansion or the bringing of existing woodland under management such as coppicing.

2.20 There is an opportunity to enhance the existing woodland from potential adverse effects of any future settlement growth at Bishop's Stortford, Hertford, while there is also an opportunity to provide new biomass fuel sources (e.g. woodland managed as short rotation coppice) to meet the energy needs of existing high density heat demand areas

identified in the Low and Zero Carbon Study and areas targeted for high density new development (see **project 2** and broad principles relating to woodland enhancement zones outlined in **Figure 3.1** in the GI Plan).

2.21 Opportunity identified in the East Herts Core Strategy Issues and Options to supply new development in villages from community energy schemes using combined heat and power technology fired by newly planted woodland. New woodland could also help to provide climate change adaptation through shading and cooling effects in summer while also softening the urban edge.

Land remediation

2.22 The following documents were reviewed: Strategic Housing Land Availability Assessment (SHLAA), Minerals and Waste Development Framework for Hertfordshire – Waste Core Strategy, East Herts LDF – Core Strategy, Indices of Multiple Deprivation (IMD), National Land Use Data (NLUD).

2.23 The 2007 Index of Multiple Deprivation (IMD) shows that overall the District has very few areas of deprivation. Much of the land is used for agricultural practices; however areas in the south west of the District surrounding Hertford and Ware have higher levels of deprivation. These include Hertford Sale, Hertford Castle, Stanstead Abbots and Hertford Kingsmead. Areas of Bishop's Stortford in the east of the District such as Bishop's Stortford Central and Bishop's Stortford Meads are areas which present opportunity for regeneration. The District's landscape is rich and diverse, reflecting a variety of natural features and

- thousands of years of human activity. It is an undulating, complex, and widely dispersed mix of fields, woodland, river valleys and settlements, with the main river valleys of the Lee and Stort containing the major settlements where limited higher levels of deprivation exist.
- 2.24 Existing mineral sites in the District could be monitored in terms of landscape quality to minimise any long term impacts on the landscape and allow for restoration to be planned at an earlier stage of the life of mineral sites such as the ongoing positive restoration work at Panshanger Park (see **project 5** in the GI Plan).
- 2.25 A number of sites (e.g. Waterford, Presdales Pit & St Mary's Lane) within the District which have formerly been used as mineral extraction sites and have since been restored, provide interesting landscapes with an enormous GI resource potential in landscape, recreational and biodiversity terms. However, due to the pervious and outdated restoration techniques used, many of them have the potential to be re-restored once again and become key GI assets throughout the District.
- Nature conservation**
- 2.26 *The following documents were reviewed: East of England Biodiversity Mapping Project 2005, Hertfordshire Biodiversity Action Plan 2006, Hertfordshire & Middlesex Wildlife Trust Living Landscapes, Statutory designated sites (Natura 2000, SSSI, NNR, LNR), County Wildlife Sites.*
- 2.27 The primary land use across East Herts is agricultural. Hertford, the county seat, and Ware form the primary urban foci, and, to a lesser extent, Bishop's Stortford in the north east. Each of these settlements enjoy linear stretches of naturalised habitat into the built up area, several of which are centred on the river corridors. There is a wide network of chalk rivers across East Herts. The principal rivers of the Stort, Lee, Rib, Mimram, and Beane support a range of associated wetland features and woodland assets. However, areas of reduced ecological value do occur, largely as a result of water abstraction or pollution (see **project 3** in the GI Plan for proposals for river valley enhancements).
- 2.28 The East of England Biodiversity Map identifies core biodiversity areas through the south west of the District, in addition to the principal river valleys – the Lee, Beane and Rib. The two most common threats to ecologically-valued habitats across the District is first the relatively small and isolated patch size, which has inherently limited viability in the long term, and second, the conflict between recreational use and nature conservation. The Woodland and Heathland BAPs identified additional key threats as the lack of active management and changing management practices. The Wetlands BAP identified additional threats of low water levels and drainage, natural succession, nutrient enrichment, acidification and pollution.
- 2.29 Key opportunities include ensuring the consideration of green infrastructure provision within the strategic / Masterplanning of proposed development. Also expanding

of existing wetland features to a varied wetland mosaic, for example, including wet grassland, carr and open water could also improve biodiversity. Key areas for expansion identified in the Wetland BAP include the Stort valley, Lee and Stort confluence (Rye Meads and the Lee between Hertford and Ware, including the Rib and Beane confluences) and the Mimram Valley (see **projects 1 and 3** in the GI Plan).

2.30 Key areas within the District which have been identified for heathland, grassland and woodland enhancement and expansion include the north east chalklands, Benington and Ardeley plateau, the East Herts river valleys, River Stort flood plains, Lee Valley, and the Mimram Valley and Bramfield plateau (see **Figure 3.1** and Green Infrastructure Zones at section 3).

2.31 Alleviation of severance along transport infrastructure and use of such linear features as foci for connectivity, for example, expansion of wildlife corridors along the existing transport network, using the principles of the Trees Against Pollution¹ initiative pioneered in St Albans District are also important measures to be considered (see **projects 2 and 4** in the GI Plan).

3 Summary findings from the functional analysis

THE FUNCTIONS – SUMMARY OF NEED, SUPPLY AND OPPORTUNITY IN EAST HERTS

3.1 For each function the methodology behind the GIS spatial analysis is summarised in *italics*, with summary findings and pointers presented afterwards. This appendix cross references to the mapping shown in section 2 of the GI Plan (main report). For each function, consideration was also given to broad situations where functional need and supply mismatch may be exacerbated (potential longer term growth using initial options considered in the emerging Core Strategy where known).

Access to recreation

3.2 *The analysis considered the 2.5 km envelope around the main settlements in East Herts (Hertford, Ware, Buntingford, Bishop's Stortford, Sawbridgeworth). Accessible open space was mapped using open space datasets in the Open Space Study, together with other datasets such as Local Nature Reserves. Access links (paths and rights of way, promoted routes and cycleways) were mapped, as was point data for ROWIP priority projects. A number of open space provision standards were also applied, mainly in the form of Natural England Accessible Natural Greenspace (ANG) and Woodland Trust Accessible*

Woodland Buffers. GIS spatial and visual map analysis was then used to identify gaps in provision and barriers to access, to identify potential foci for proposals.

3.3 In Hertford, there is a deficiency in space for children and young people, and in local ANG. There appear to be few off-road links between the urban area and the surrounding countryside, and this is particularly true to the north and west of Hertford, which is severed from the countryside by the A414 and B1502 road (see proposed GI network at **Figure 3.1**). Cycle provision is also limited to one route which runs north-south through the town. Potential growth locations surrounding the town should aim to improve ANG provision as well as rights of way to support these new communities. Four 'green fingers' have been designated in local policy, and the GI functions of these areas should be maximised to help ensure that all residents have access to recreational sites.

3.4 There is good provision of open space within Bishop's Stortford, but deficiencies in strategic ANG exist, and there is a lack of provision for people to travel off-road by cycle or foot between the town and countryside. Links to the River Stort, Gilston Park, Harlow and the woodland sites to the south and east should be enhanced, and there is a potential need for a new strategic ANG site to serve existing and future communities (see **projects 2 & 3** and **Figure 3.1** in the GI Plan).

3.5 Growth is being considered to the north, south and east of the town, and access links to the countryside as well as

- cycle routes should be enhanced with consideration to potential new communities as well as existing residents.
- 3.6 There is poor provision of ANG at Buntingford, as well as in space for children and young people. This should be alleviated through creating better public access to the countryside resource that surrounds the settlement. There is also a lack of cycle route and rights of way to the north and south east of the settlement. If growth was considered to the settlement edge, rights of way / green corridors should be created to ensure these new homes have sustainable access. ANG and open space for children and young people will also need to be provided alongside any new residential areas.
- 3.7 There is a deficiency in strategic ANG (500ha) and the M11 is a barrier to movement/access to the countryside. This deficiency should be alleviated either through enhancing existing assets or through the creation of new strategic ANG to serve the existing and future populations of Bishop's Stortford, Sawbridgeworth and Harlow. Small amounts of growth are being considered to the west and north of Sawbridgeworth, as well as a potential larger extension to the north of Harlow, and there is a need for strategic ANG sites to cater for existing and new communities (see **project 2** in the GI Plan).
- 3.8 There is poor provision of ANG at Ware, as well as in space for children and young people. This should be alleviated through creating better public access to the countryside resource that surrounds the settlement,

including the Lee and Rib rivers. The A414 and B1502 are barriers to access to the countryside (see **project 1** and **Figure 3.1** in the GI Plan).

Prestige on Settlement Approach Corridors

- 3.9 *The analysis considered the 2.5 km envelope around the main settlements in East Herts. Using data developed for the earlier Hertfordshire V4C project, a series of assets and detractors were mapped around settlement fringes. Assets included open space and areas of woodland planting, as well as water bodies and main rivers. Detractors included degraded land such as mineral workings and industrial sites. These were mapped within a 500m buffer of main road and rail corridors on settlement gateways, to understand where experience of GI assets may be impaired currently and to inform the spatial direction of proposals. Detractors were also considered with landscape character areas of lower quality as identified in the Landscape Character Assessment, to target areas where landscape enhancement could contribute to GI proposals development.*
- 3.10 In Hertford, key issues are in relation to verge management and character e.g. to introduce a less urban character to the A414 and A10, as well as to re connect woodlands as part of the ongoing positive restoration scheme for Panshanger Park and to buffer/foil detracting features, as well as to enhance the setting of Hartham Common (see **projects 1 and 5** in the GI Plan). Also re-connection of woodlands to the south of Hertford around Hertford Heath and restoration of valley floor features

- where eroded by detracting features, to provide more positive sense of arrival e.g. Rivers Beane and Rib (see **project 3** in the GI Plan).
- 3.11 Key issues in Ware relate to severance of main assets by transport corridors (e.g. Hartham Common and King's Mead by the A10). Seek to enhance crossing and interface with road corridors (landform/heatland/low level planting). Also restore and reinstate wetland habitats associated with workings in the Rib Valley to give a better settlement approach (see **project 1** in the GI Plan). Similarly in the eastern Lee Valley and the Navigation.
- 3.12 Main issues relate to enhancing and buffering of primary assets such as Pishiobury Park at Sawbridgeworth. Also beyond the settlement envelope, to include consideration of the relationship to Gilston Park (and buffering from detractors south and east of Gilston). The setting of the Stort Valley is impaired to the north of Sawbridgeworth and could be improved with small scale wetland planting as part of a package of measures to deliver the Stort Valley Project as identified in the Harlow GI Plan and the Stort Valley Feasibility Study, e.g. that structural green infrastructure provision, whilst buffering detractors and edges, should not detract from the more open landscape character here. There may be considerable potential for detracting features in the valley floor to be restored and used as part of the greenspace network/Stort Valley Park (see **projects 2 and 3** in the GI Plan).

- 3.13 Severance and fragmentation of landscape structure due to the bypass at Bishop's Stortford is an issue relevant to GI – opportunity to reconnect areas of woodland to enhance perception of tranquillity and settlement approach. Assets and detractors are at close proximity in the Stort Valley, which also contains a number of transport corridors. A key opportunity is to extend wetland vegetation and wet woodland habitat to enhance settlement edge/interface with the valley at this point and to consider this as part of proposals for access links in the Stort Valley Park proposed in the Harlow GI Plan. To the east of Bishop's Stortford within Essex expanded woodland planting could re connect Hatfield Forest and provide attenuation in relation to the M11 interchange (see **Figure 3.1** in the GI Plan).

- 3.14 In Buntingford, the landscape has a simple and open character with few detractors. GI enhancement issues will relate mainly to integration of the hard southern edge of Buntingford with localised foiling and using such landscape structure to make better visual connections with wet woodland in landscapes such as the Quin Valley (see **project 4** in the GI Plan). Also occasional small scale woodlands to link the existing relatively sparse distribution in the settlement envelope whilst maintaining simple, open landscape character. Enhanced hedgerow planting would be beneficial to the A10 bypass to improve the setting of and approach to Buntingford in the landscape.

Health

- 3.15 The analysis considered the 2.5 km envelope around the main settlements in East Herts. In addition to paths and rights of way and other access routes such as cycle routes, the Indices of Multiple Deprivation (IMD) were mapped, considering the 40% most deprived wards in the settlement within the District. Taking this with mapped information on barriers such as arterial transport corridors enabled the analysis to target areas where green infrastructure could potentially address deprivation issues through enhanced linkages.
- 3.16 Within Hertford poor health is not currently a problem, with the exception of Sele ward. However, lack of adequate open space provision for children and young people should be addressed to avoid problems arising in the future. Growth is being considered to the north, south and west of Hertford, and open space provision as well as routes for healthy transport options should be delivered alongside this potential growth (see **project 2** in the GI Plan).
- 3.17 In Bishop's Stortford, the Central and Meads Wards have been identified as areas of deprivation. Poor health is not generally a problem in Sawbridgeworth or Ware; however improvements to the cycle and path network should be delivered to enable people to live healthier lifestyles. Where growth is proposed, healthy new communities should be enabled through provision of quality open space, cycle and path routes. Enhanced links are shown at a strategic level on Figure 3.1 in the GI Plan.

Sound ecosystems

- 3.18 The analysis considered the whole District. Environment Agency Water Framework Directive (WFD) GIS data was used for the main rivers and their catchments, to understand issues of ecological quality, low flows and abstraction pressures. High intensity traffic flows and main roads were also mapped to provide a broad picture of air quality issues. These two datasets enabled targeting of strategic GI proposals and zones in terms of wetland enhancement and large scale tree and woodland planting.
- 3.19 The analysis indicates a need for positive management of all the rivers in the District, particularly the Ash due to the high level of environmental contaminants (see **project 3** in the GI Plan). The riverine environment of the Lee, Stort, Mimram, Rib, Beane, Quin & Ash Rivers are identified as being of poor ecological status and vulnerable to abstraction and low flow pressures. Key areas for expansion identified in the Wetland BAP include the Stort valley, Lee and Stort confluence (Rye Meads and the Lee between Hertford and Ware, including the Rib and Beane confluences) and the Mimram Valley.
- 3.20 Opportunities include reinstatement of native wetland and riparian river valleys (see **project 3** in the GI Plan). Also additional wetland creation in the Ash and Lee to reinforce habitats in light of high abstraction pressures.
- 3.21 Whilst large parts of the principal transport corridors are partly wooded (M11 & M25) there is a need for additional woodland and hedgerow belts to re connect existing

woodlands and improve air quality (e.g. connecting Panshanger Park to the eastern edge of Ware via the A414).

3.22 Although the Trees Against Pollution (TAP) project (pioneered by St Albans District) does not fall within this District, the principles relating to tree selection and management could be implemented along roadsides throughout the District. The TAP project notes that only trees adjacent to transport corridors are effective in absorbing pollution. It also identified species which can positively contribute to air quality as Scots pine, common alder, larch, Norway maple, field maple, ash and silver birch. With reference to the TAP report species which can have a detrimental effect on air quality are English oak, crack willow, goat willow, poplar, red oak, sessile oak and white willow.

3.23 Future development in Ware, Hertford and Bishop's Stortford could place further abstraction pressures on the Lee, Ash and Stort Rivers, further heightening the need for positive management and wetland expansion (see **projects 1 and 3** and broad principles set out in **Figure 3.1** in the GI Plan).

Productive green environments

3.24 This analysis considered the whole District, mapping provision of allotments, traditionally managed orchards and farmlands covered by higher level stewardship agreements, as well as land in organic stewardship. Patterns were noted in terms of

distribution and opportunities for new provision noted. Performance against recommended provision standards (e.g. for allotments) was also considered.

3.25 Consideration of the wider farmland landscape in East Herts reveals that a relatively large proportion (864.50 ha) of the District's landscape is managed through Higher Level Stewardship (HLS). These areas are notably parts of the estate at Benington and associated farmland in the Ash Valley east of Ware, while there is also a small area at the Rivers Nursery Site at Sawbridgeworth protected. As such, there is an opportunity to enhance HLS uptake to improve functionality of farmland, particularly where this could deliver enhanced landscape connectivity or interpretation of historic landscape assets (linked to 'conserving historic landscape character' analysis). There is also potential to improve uptake of organic level stewardship with the District currently having only one site (81 ha). This also forms part of the focus for a series of GI 'action zones' (including for farmland conservation and enhancement), shown on GI Plan **Figure 3.1**.

3.26 At the local level, allotments, as part of Bishop's Stortford's 'green wedges', are cited by the East Herts Core Strategy Issues and Options as an important feature of the relationship between the town and the surrounding countryside. They are also cited as a valued leisure facility in Bishop's Stortford, Sawbridgeworth, Ware and Hertford, with council-owned sites in Bishop's Stortford and Sawbridgeworth having waiting lists. This is at odds with the older evidence from the PPG17 audit that the

- quantity of allotment provision is sufficient so additional orchards could be integrated in applications for new large scale development in the larger settlements.
- 3.27 The Rivers Nursery site at Sawbridgeworth has historic importance for fruit production and breeding and is cited by the East Herts Core Strategy Issues and Options as one of the open spaces of particular importance to the settlement's character and promoting its identity as an important GI asset could help improve the setting and approaches to Sawbridgeworth (see **projects 2 and 3** in the GI Plan).
- Conserving historic landscape character**
- 3.28 *This analysis considered the whole District. Designated historic assets such as registered parks and gardens and Conservation Areas were mapped and the qualifying features of designation relevant to green infrastructure noted. Consideration was also given to non designated assets important to urban green infrastructure heritage in general (e.g. links to green spaces project in Harlow New Town).. Ancient woodlands were mapped, and the proportion of both these and registered parks and gardens actively protected through schemes such as environmental stewardship identified. As much of this function is about understanding and conserving historic legacy, the Historic Landscape Character types identified as regionally rare by Hertfordshire County Council, were mapped. The aim was to understand distribution of historic landscape elements and boundary networks which could contribute to the green infrastructure network.*
- 3.29 Rare historic landscape types in East Herts are Co Axial Enclosures, which occupy around 1% of the District area. The Co Axial Enclosures (boundaries of adjacent fields make a series of long, roughly parallel lines) form part of the Farmland Conservation and Enhancement Zone on **Figure 3.1**.
- 3.30 Although there is a large number of Registered Parks and Gardens (15) alongside a high number of Conservation Areas, little of the ancient woodland heritage resource is protected and only four of the sixteen registered parks are in an agri-environment scheme. There is a very large and rather dispersed ancient woodland resource, with two covered by Conservation Areas (Moor Hall Wood and Hadham Cross Wood) in addition some sites enjoying other protection e.g. through SSSI designation (High Wood, Moor Hall Wood, Plashes Wood, Wormley Wood, Hodesdon Park, Broxbourne Wood and Great Hormead Park).
- 3.31 Any urban extension to the settlements within the District, particularly surrounding Hertford would need careful consideration to integrate the design proposals with the historic landscape with emphasis placed on the retention and protection of ancient woodlands and consideration of parkland settings. Any such development would require the creation of additional features which would enhance the setting of the site using historic landscape framework as template. Any additional road or infrastructure corridors which create severance within the historic fabric of the landscape pose a threat to the protection of this

resource and may require further woodland creation to buffer and enhance such sites.

Sustainability and responding to Climate Change

3.32 Within the 2.5km envelope of the main settlements, accessible woodlands were mapped using National Woodland Inventory data. Visual analysis of aerial photography was also undertaken, to understand the distribution of street trees and the opportunity for urban greening. Gaps were noted as possible opportunity areas for green infrastructure.

3.33 In general, the settlements display a relatively high density of tree cover in terms of woodland blocks and corridors, in principal open spaces and along infrastructure routes. However tree cover within the public realm is generally limited to these and streetscape planting including higher density of planting in the suburbs.

3.34 Most settlements appear to have very high levels of tree cover in private gardens but are lacking in parts where street verges are limited. Issues and opportunities relate mainly to conserving what exists and managing this appropriately / planning for succession planting and ensuring new tree planting in relation to redevelopment sites – use of the TCPA standards for enhanced urban tree planting of 80 street trees (of appropriately robust grade) per linear km. Any future growth and redevelopment should plan for street tree planting as an integral part of the masterplan to ensure climate change adaptation,

seeking to apply the TCPA tree planting standard as referenced above.

Land remediation

3.35 This analysis considered the whole District. East Herts has been mapped and analysed for this exercise in order to identify where former waste, restored minerals and contaminated land sites could be restored and aid the development of the GI network. Any disused mineral sites within the District were identified and their current use and surface condition were assessed. Also considered in the analysis were the IMD (Indices of Multiple Deprivation) and the quality of the Landscape Character Areas in which the sites were located.

3.36 As referenced in the Liz Lake Landscape and Visual Assessment Report, the former mineral sites within the District are each in relatively good condition and could be considered for re-restoration. Restored sites, particularly Waterford Pit and Presdales Pit could contribute to the GI network within the District and any future urban extensions could incorporate plans for links to these areas which are in close proximity to urban settlements and provide interesting landscapes with great potential for improvement (see **project 5** in the GI Plan).

3.37 Areas of lower landscape quality as identified in the Landscape Character Assessment tend to have been previously worked for minerals. These occur in close proximity to the larger settlements of Buntingford, Bishop's Stortford, Sawbridgeworth and to a larger extent

around Hertford and Ware. As such they form part of the focus for ongoing landscape conservation, enhancement and restoration zones as shown on **Figure 3.1** in the GI Plan.

Nature conservation

3.38 *Consideration was given to the whole District, noting distribution of internationally, nationally and locally designated assets. Cross referring to the earlier document review, main issues and vulnerabilities were noted. Hertfordshire Biodiversity Action Plan Key Biodiversity Areas and Living Landscape areas were mapped, to understand where there may be potential for enhanced landscape and habitat linkages through green infrastructure.*

3.39 Key issues for the GI Plan to focus on are alleviation of pinch points on river corridors through urban areas – Hertford and Ware in particular (see **project 3** and **Figure 3.1** in the GI Plan for broad principles).

3.40 Where future growth points may potentially link distinct urban areas - maintenance/enhancement of ecological connectivity through this belt may entail 'stepping stones' as well as linear features through GI incorporated into new development proposals (e.g. to reconnect landscape features).

3.41 Key locations for GI to deliver biodiversity benefits are throughout the Mimram / Lee Key Biodiversity Area (KBA). Extended west along the Mimram valley to alleviate pinch points through Hertford and extend to Welwyn

through the adjoining KBA. Extend north east along the Lee valley to strengthen GI through the urban areas of Harlow, Sawbridgeworth and Bishop's Stortford. Strengthen the Rib KBA close to the A10 corridor (existing severance), south of Buntingford (several growth points), while also through the Ash KBA extending north to Little Hadham (which overlaps Little Hadham KBA) and south to link to the Mimram/Lee KBA / LL (which encompasses the locally designated sites to the south east of Ware).

3.42 Additional areas include potential future growth points – along the east county boundary (Harlow, Sawbridgeworth and Bishop's Stortford), Hertford and Buntingford. Potential for greatest impact is where currently distinct urban areas become linked, e.g. Harlow and Bishop's Stortford, with associated potential fragmentation of ecological/landscape features.

Experience

3.43 *The analysis considered the whole borough. Using the Regional Landscape Typology as a starting point, the 27 rural landscape types of the region were assigned rarity based on percentage distribution. The three rarest landscape types were considered for analysis as these often form a potential focus for place and conservation orientated green infrastructure proposals (e.g. chalk landscapes). Their distribution was noted as was the percentage distribution as a proportion of the total regional distribution of the landscape type. Tranquillity, intrusion and*

night skies mapping were also used to build a broader picture of landscape experience and quality.

3.44 The main regionally rare landscape typesⁱⁱ in East Herts have been identified as Settled Chalk Valleys and Wooded Chalk Valleys landscape types. The Settled Chalk Valleys represent approximately 19% of the District area (note that this also represents approximately 43% of the total regional distribution of the landscape type) and the Wooded Chalk Valleys represent approximately 4% of the District (note that this also represents approximately 10% of the total regional distribution of the landscape type).

3.45 The Regional Landscape Typology identifies key characteristics of the Wooded Chalk Valleys as steep sided, wooded valley landforms, seasonal watercourses in upper valleys and permanent watercourses/flood meadows in larger, lower valleys. Also an interlocking pattern of ancient woodlands on the steepest valley slopes, creating an intimate spatial character. The valleys often form transport corridors, impairing tranquillity, which is apparent in this District.

3.46 The Settled Chalk Valleys and Wooded Chalk Valleys should be conserved, managed and enhanced to maximise their functions (character, floodplain, biodiversity, access). However, the tranquillity of the Wooded Chalk Valleys is often impeded by road and transport corridors, with all of this landscape type within the District lying within areas of intrusion as defined by the CPRE intrusion mapping. There

is an opportunity to enhance access in a way that maintains the tranquil character of the valleys

3.47 A key opportunity may be to facilitate enhanced access in appropriate locations, such as the expansion of the riparian habitat through HLS (e.g. Beane Valley). There may also be an opportunity for some restoration of woodland linkages and to re connect ancient woodlands on ridges, to provide enhanced definition of the valley network.

3.48 Both the Settled Chalk Valleys and Wooded Chalk Valleys form primary aspects of the District's green infrastructure network (in terms of landscape character, floodplain, biodiversity, and, to a degree, access. They should therefore be conserved, managed and enhanced as such. A key opportunity may be to facilitate enhanced access in appropriate locations, ensuring this was of a low-key character, maintaining the often more tranquil character of the tributary valleys. Also expansion of riparian habitat through HLS (for example in the Beane Valley). Whilst the landscapes surrounding the valleys are often open and of relatively large scale there may be the opportunity for some restoration of valley crest woodland linkages and to re connect ancient woodlands on ridges, to provide enhanced definition of the valley network, where a more intact landscape framework already exists as a template (see **Figure 3.1** in the GI Plan).

3.49 If growth was considered in valley settlements such as Buntingford and Sawbridgeworth, this could place pressure on the existing green infrastructure resource and

necessitate expansion of valley landscape and habitat to ensure landscape fit, although the floodplain constrains development within the valley proper. Any growth within Sawbridgeworth should seek to respond to the aims and objectives of the Stort Valley project e.g. to maintain space for a linked and multi-functional network of valley landscapes (see **project 2** in the GI Plan). Growth to the fringe of Bishop's Stortford may provide the opportunity to enhance the settlement interface with the Stort Valley – positive new green gateways as part of the GI network. Similarly any growth to the northern fringe of Bishop's Stortford should aim to secure enhanced links to the local green infrastructure resource e.g. the Stort Valley. The same principles would be applicable to Hertford, at the confluence of five valleys. If large scale growth was considered to the north of Harlow, key objectives would be to conserve and enhance the character of the valley and associated assets such as Gilston Park, as well as to maximise linkages and connections to and across the valley, as part of the GI network and the Stort Valley Park proposed as part of the Harlow Green Infrastructure Plan.

Flood attenuation and water management

3.50 *This considered the flood zones in the 2.5km envelope of the main settlements, and proximity to designated nature conservation sites, to understand vulnerabilities in the context of water level fluctuation.*

3.51 East Herts falls within the River Lee and Stort Catchments, part of the wider Thames catchment and Thames River

Basin. The River Lee, rising north of Luton, flows in a southerly direction through the District towards London, fed by a number of chalk tributaries which cut the landscape of East Herts. These are the River Mimram, rising in Welwyn and joining the Lee at Hertford, the River Beane, rising in North Hertfordshire and running into the District east of Stevenage at Walkern, before joining the Lee at Hartham Common, the River Ash, flowing through the Hadhams and Furneaux Pelham, meeting the Lee at Amwell Nature Reserve (near the northern extents of the Lee Valley Regional Park), the River Rib, which flows through Buntingford and south of Braughing before joining the Lee east of Hertford, and its associated tributary, the River Quin. Finally the River Stort, which rises from Royston and flows along the Harlow boundary before meeting the Lee at Rye Meads.

3.52 Hertford is located at the confluence of a number of tributaries and as a result the flood zone poses a significant threat to development. A review by the EA has identified most of the river water bodies in this area as been at risk in terms of low flows and abstraction pressures. Pinch points along the rivers routes are common in Hertford and developed land near Mill Bridge and Cow Bridge is at risk of flooding due to the narrow width of the river channels.

3.53 The flood zone in Ware acts as a multi-functional GI asset where expansive areas of open space benefit from flooding. Amwell Quarry, a former abstraction site, now acts as a flood attenuation area and nature reserve. Much of the Lee in this area has been heavily modified and its course

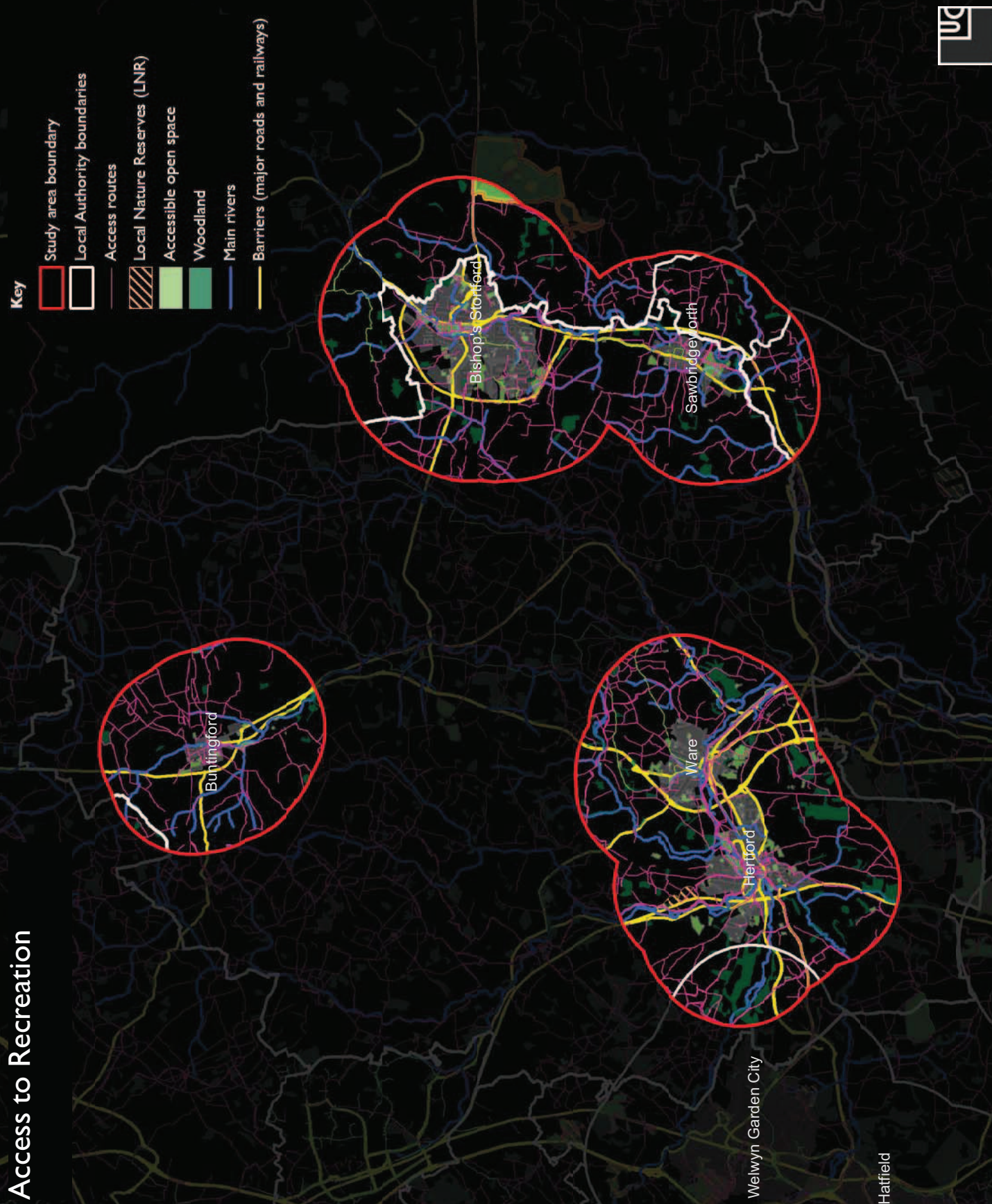
- altered over time. To the west of this area the flood zone widens at Kings Meads and any flood risk is alleviated by the expansive open space.
- 3.54 Any further development within the flood zone could potentially exacerbate the risk of flooding in the area. The tributaries of the Lee which run through the town centre pose significant risk to residential properties in this area and increase the risk of surface water flooding. Retro-fitting SuDS where possible and ensuring permeable paving is used where possible should be considered.
- 3.55 The flood zone within Buntingford is primarily open space along the river valley which runs through the settlement. Acting as a multi-functional space, the river is a key GI asset in the town. A number of flood defences have been built along the course of the river which has its course modified over time; however the flood zone poses a risk to a number of residential properties along its route.
- 3.56 Any sites identified for future development surrounding the settlement could potentially be at risk of flooding due to proximity to the flood zone. Potential sites are located outside the flood zone; they could however lead to increased pressure on ground water resources as the area is considered to probably be at risk of abstraction and low flow pressures. Mitigation could include SuDS and additional flood attenuation areas to contain run off and fluvial flooding during times of high flows.
- 3.57 On the northern side of Bishop's Stortford, the flood zone is a wide valley which follows a natural meandering course through the centre of the settlement. Where the river runs through Hockerhil and New Town, and its natural course has been altered, pinch points (bridges, weirs etc.) have been created which could exacerbate flood risk during times of high flows.
- 3.58 Any proposals for development to the north of the settlement near Foxdellas Farm could be at risk of flooding due to the proximity to the flood zone. Any proposals would need integrated flood attenuation areas and would need to be sympathetically designed with the natural flow of the river. Other areas zoned for potential development do not lie directly in the flood plain but could exacerbate pressures on abstraction levels in the area and could create problems in relation to surface water flooding.
- 3.59 The flood zone in Sawbridgeworth extends over expansive areas of open space along the eastern boundary which is a key GI asset in this area. Within the flood zone, The Stort Valley Way and the Three Forests Way provide access to this recreational area. Much of the river valley here benefits from flooding and although the river is heavily modified, existing abstraction pressures probably do not pose a risk. Development however has encroached on the flood zone in Lower Sheering and a number of residential properties are at risk of flooding.
- 3.60 Development is confined by the railway line which could increase pressures on the flood zone. A potential urban extension to Sawbridgeworth located on the western boundary near Chalks Farm, may pose surface water

problems in this area. Also development to the north near Three Mile Pond Farm may pose a risk to properties in relation to fluvial flooding and ground water flooding in this area. Additional flood storage areas may provide an opportunity to divert water away from this area and create additional wetland habitats. These broad principles in relation to wetland habitats and valley conservation are outlined in greater detail the description of GI action zones and shown in **Figure 3.1**.

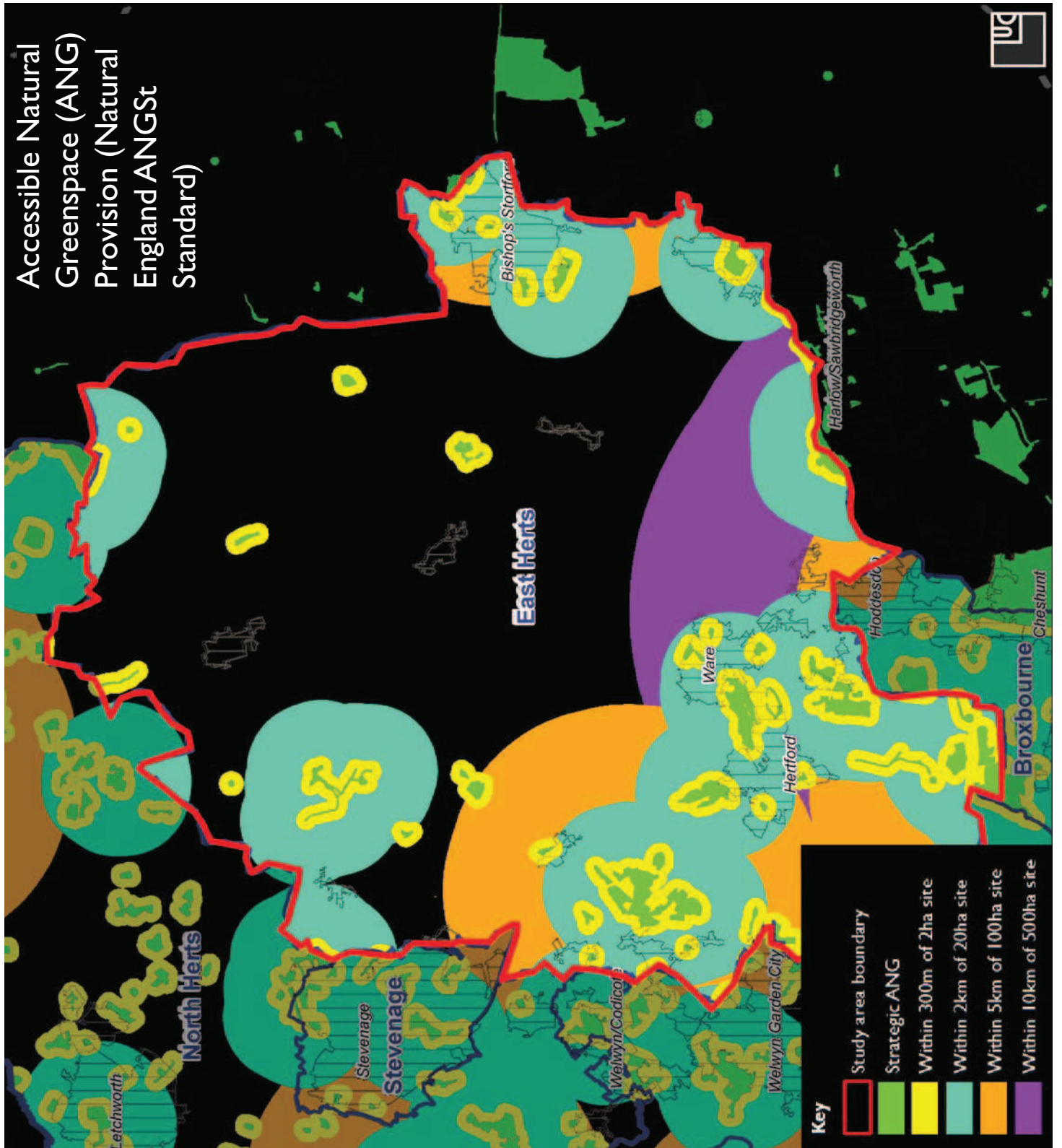
Functions Mapping:

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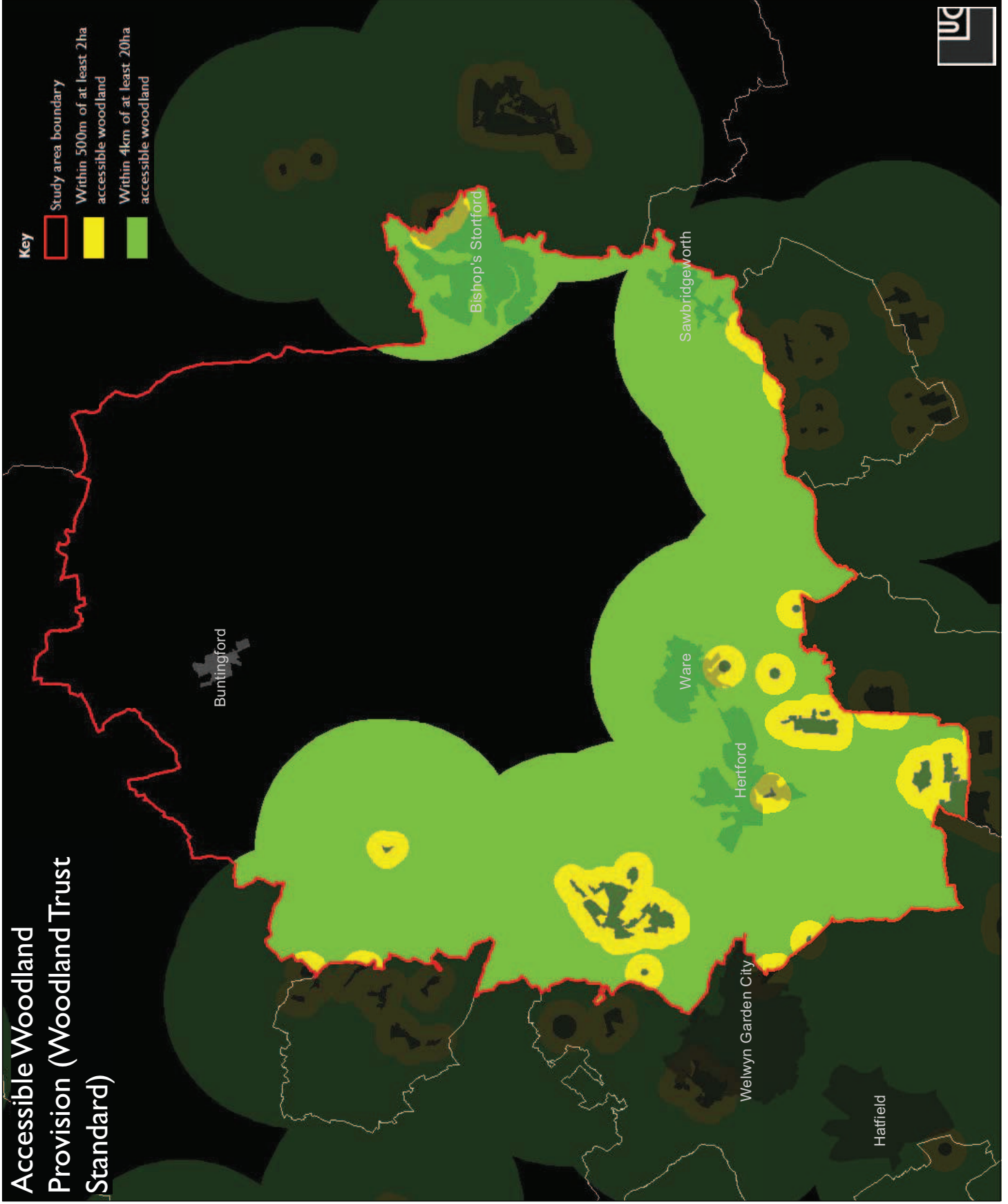
Access to Recreation



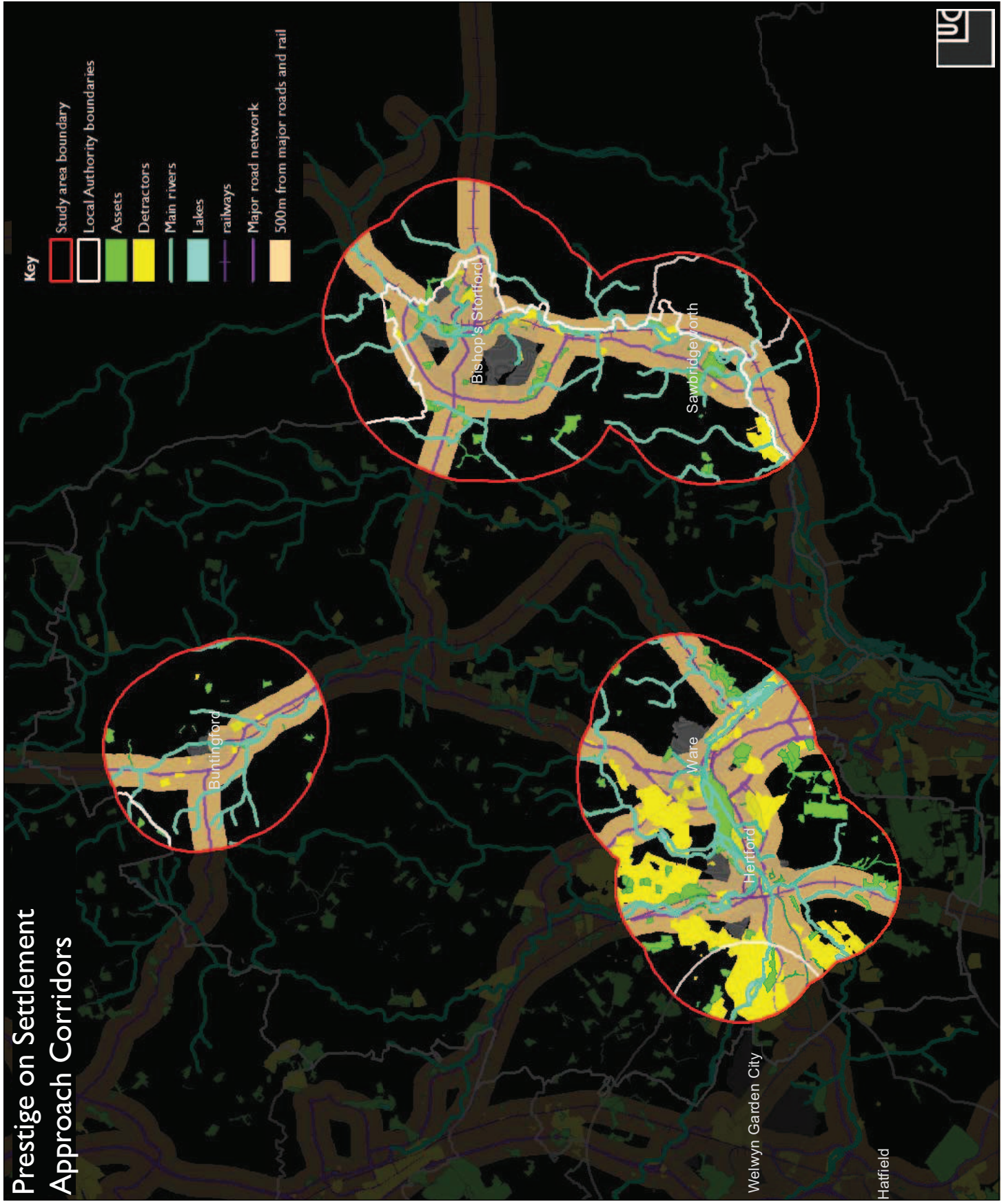
Accessible Natural Greenspace (ANG) Provision (Natural England ANGSt Standard)

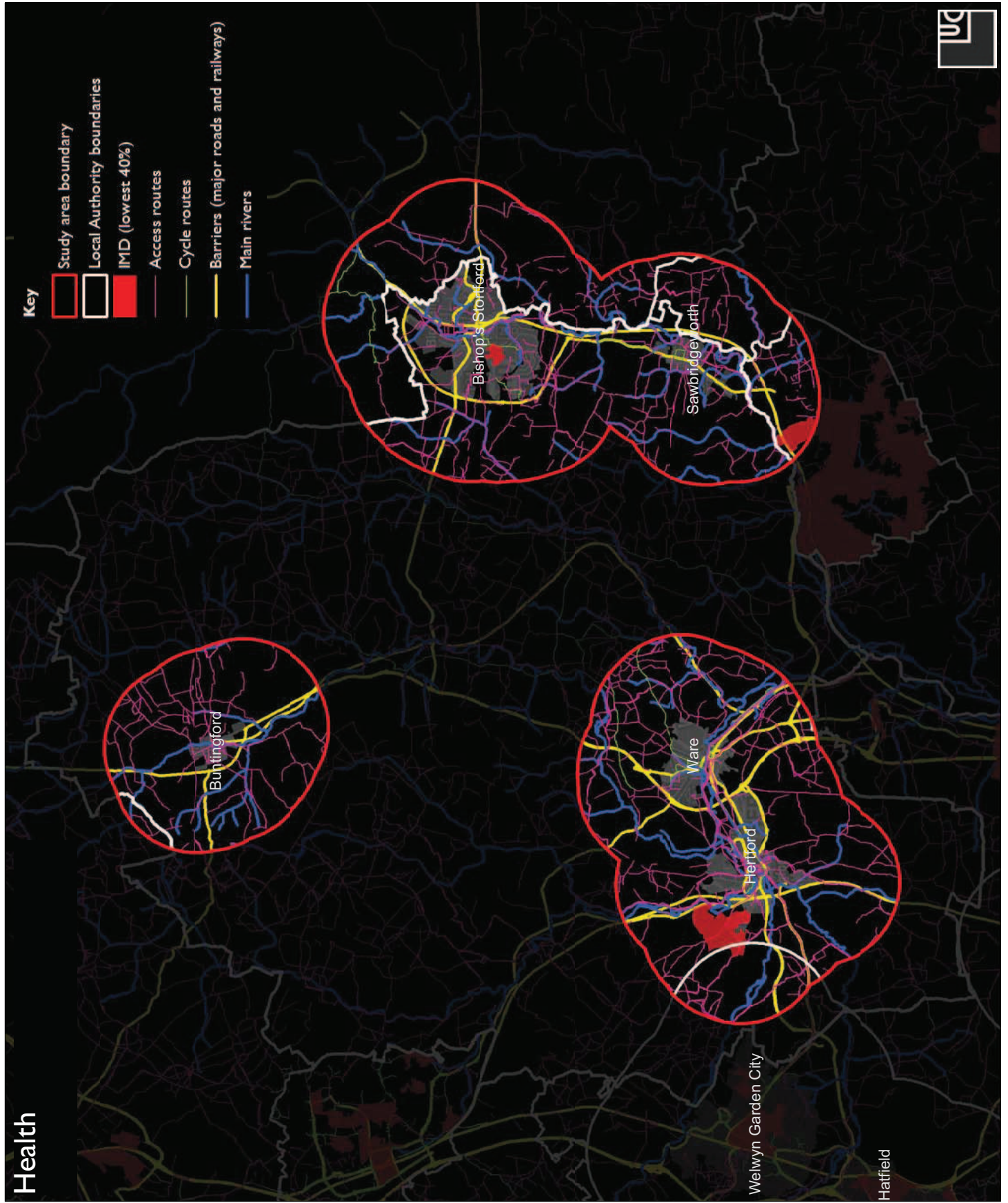


Accessible Woodland Provision (Woodland Trust Standard)

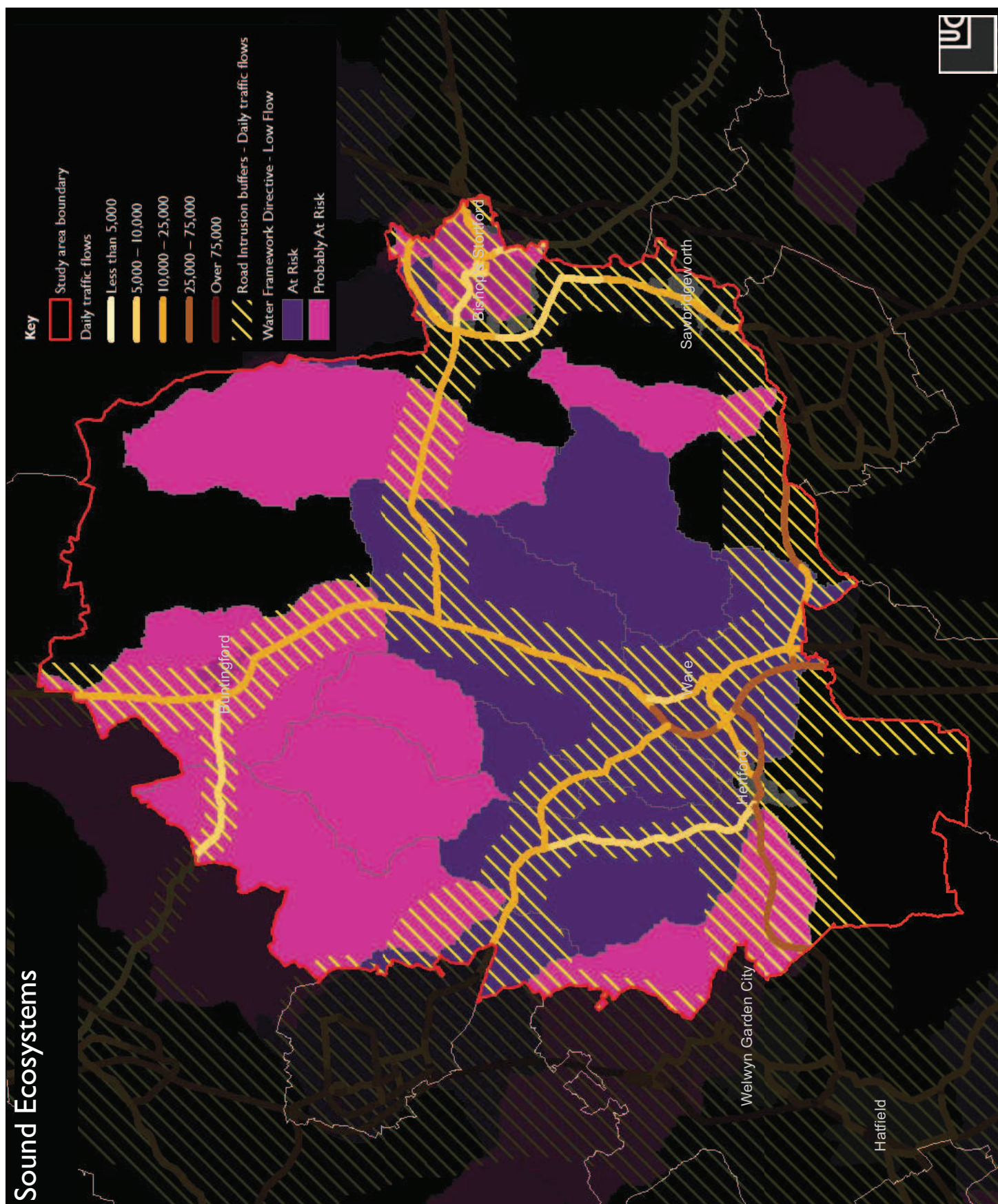


Prestige on Settlement Approach Corridors

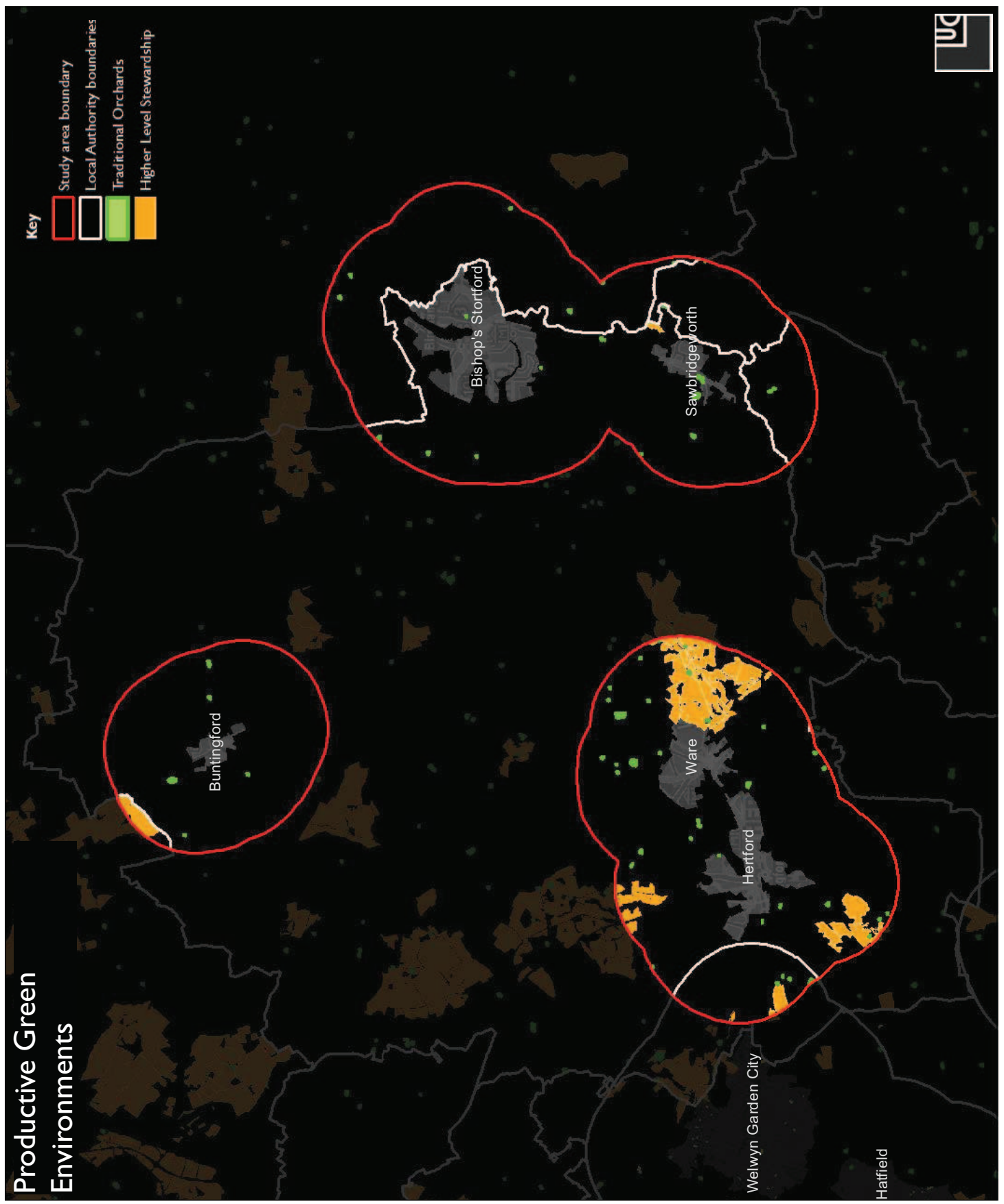




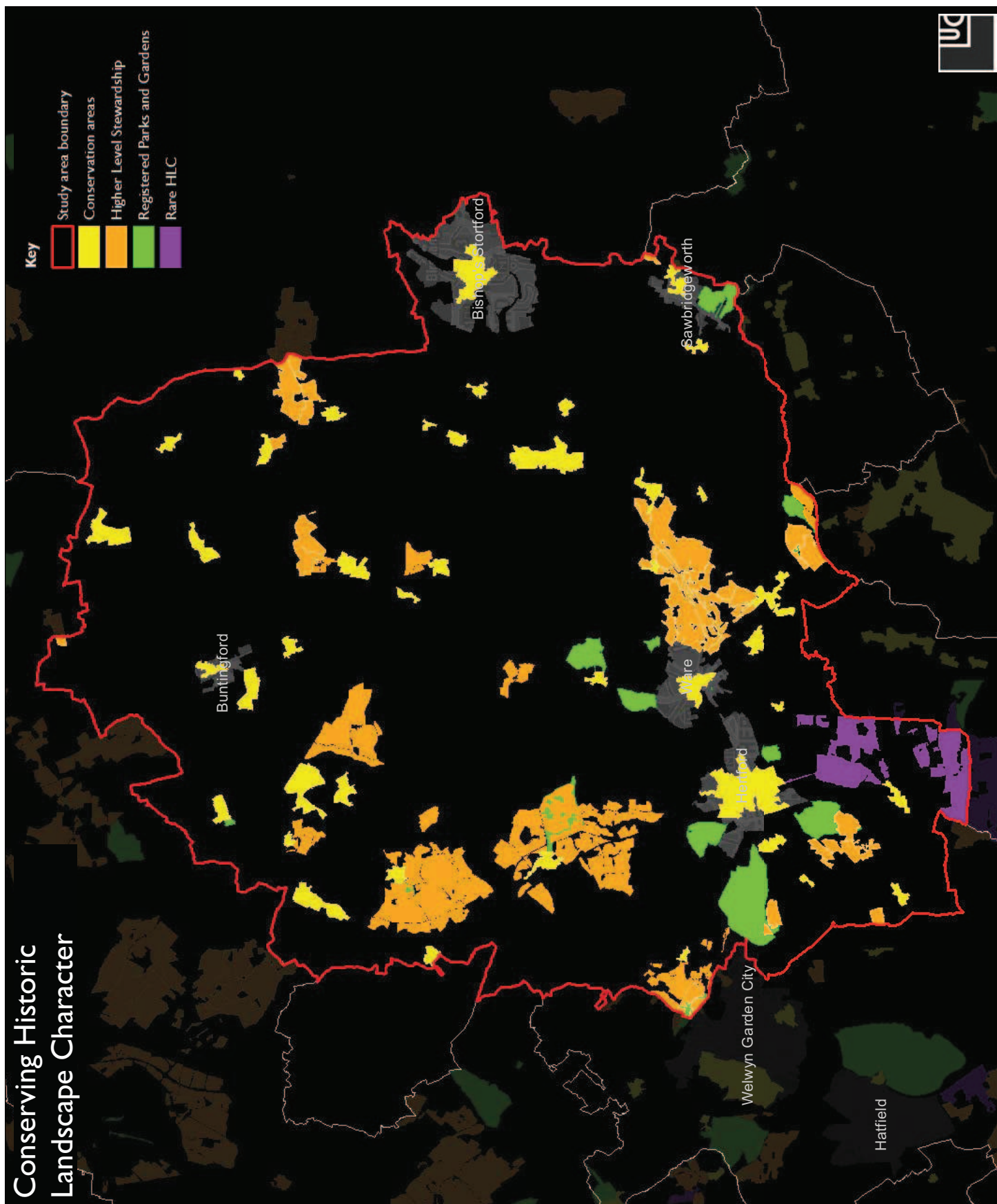
Sound Ecosystems



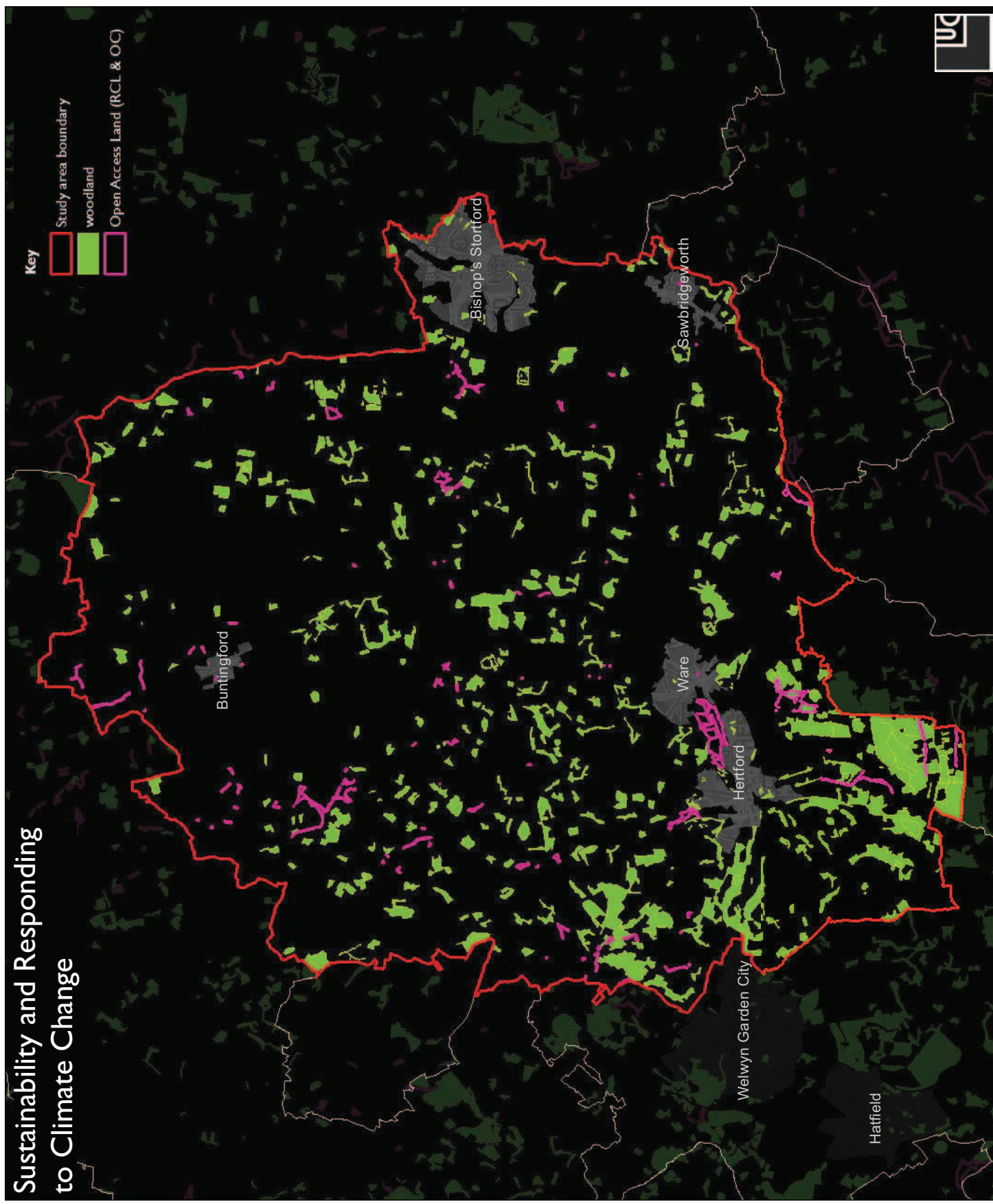
Productive Green Environments



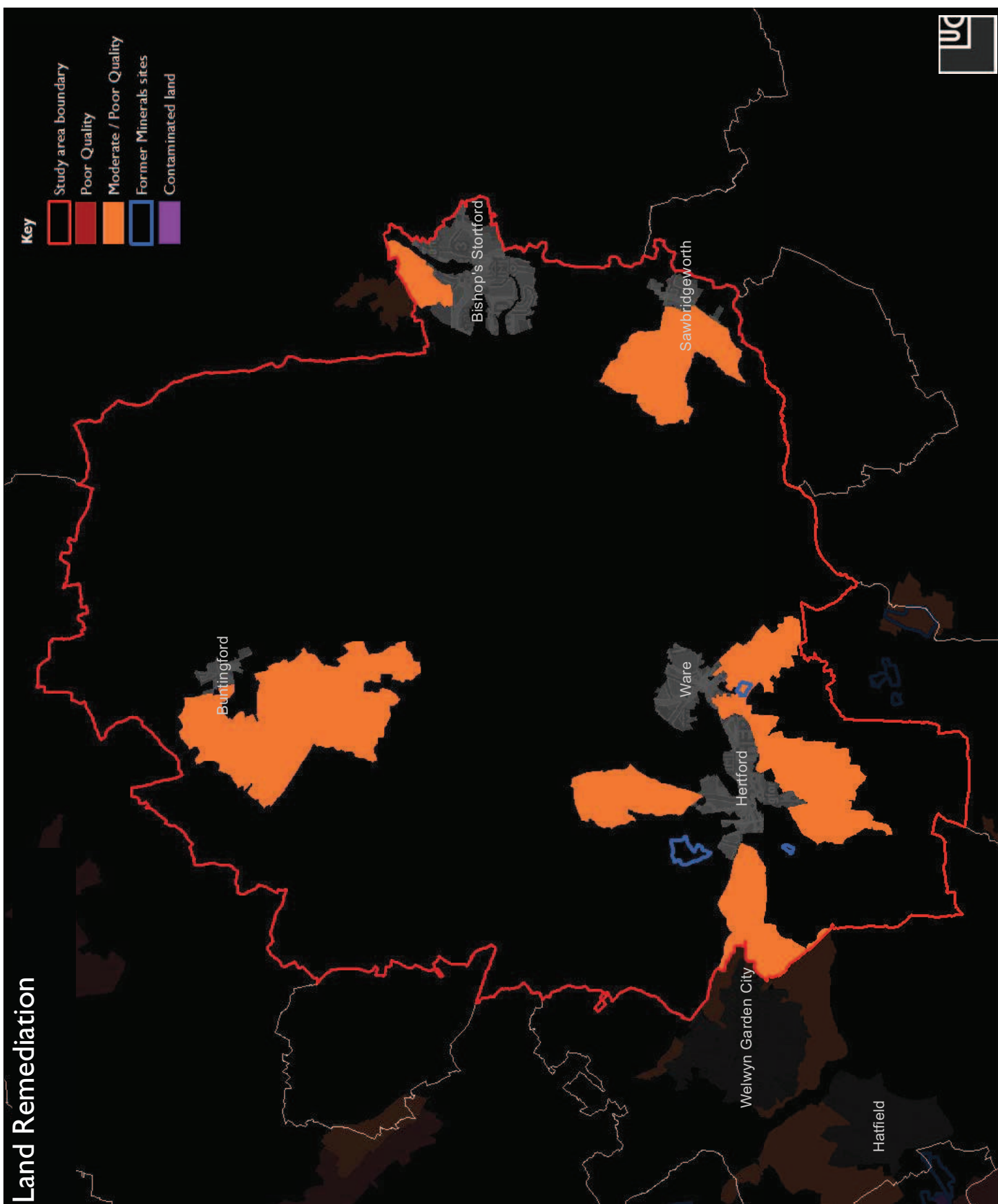
Conserving Historic Landscape Character



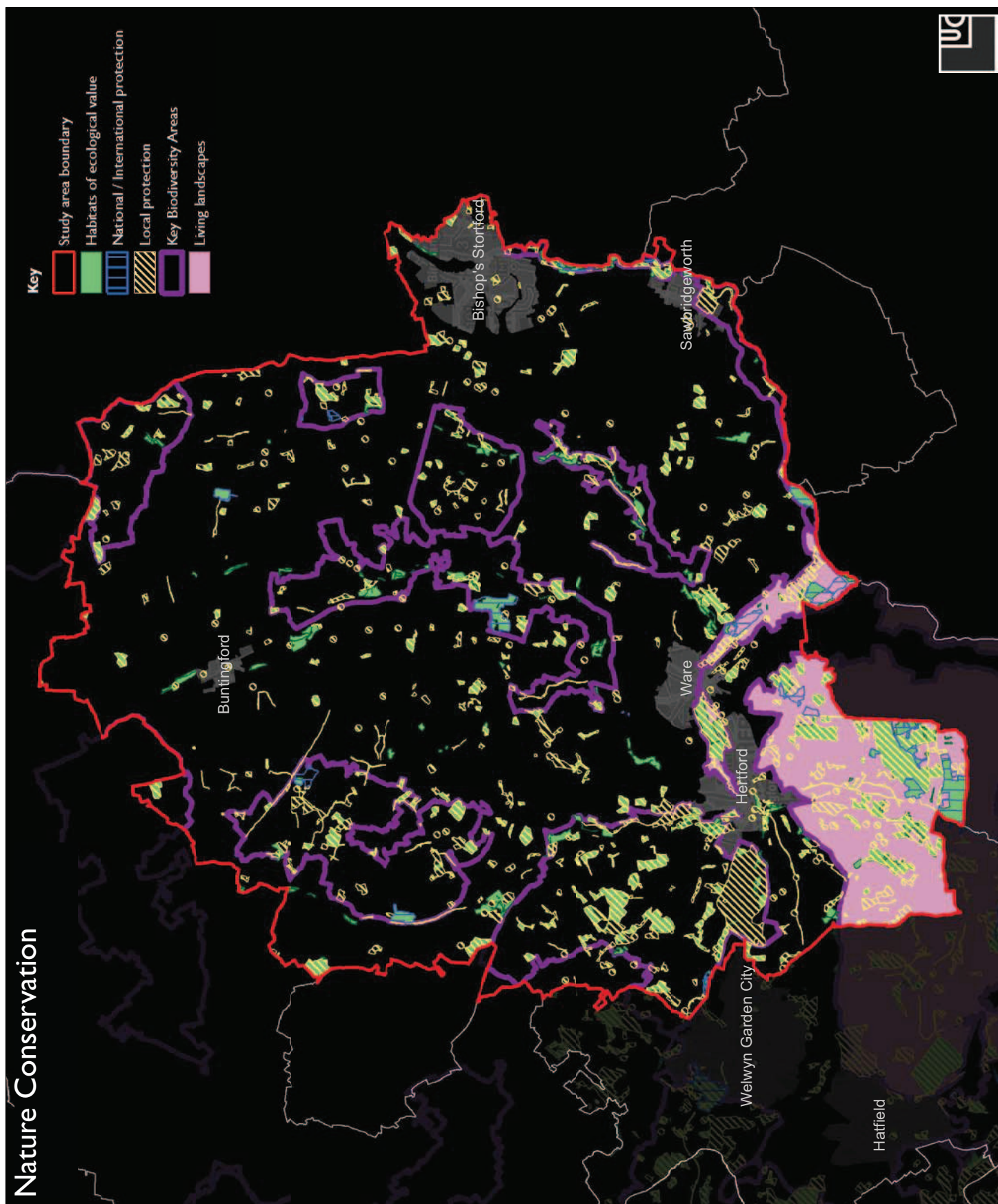
Sustainability and Responding to Climate Change

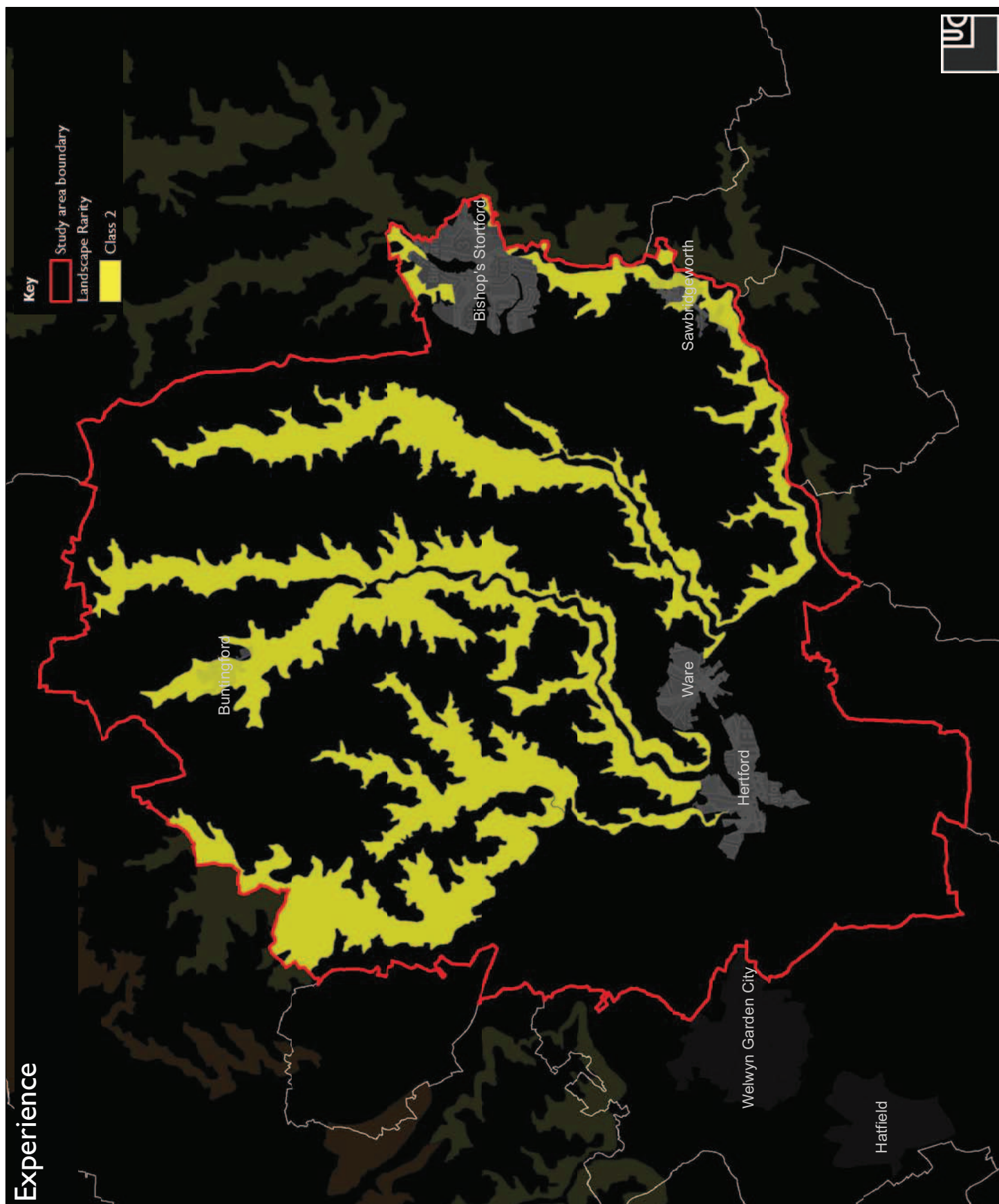


Land Remediation

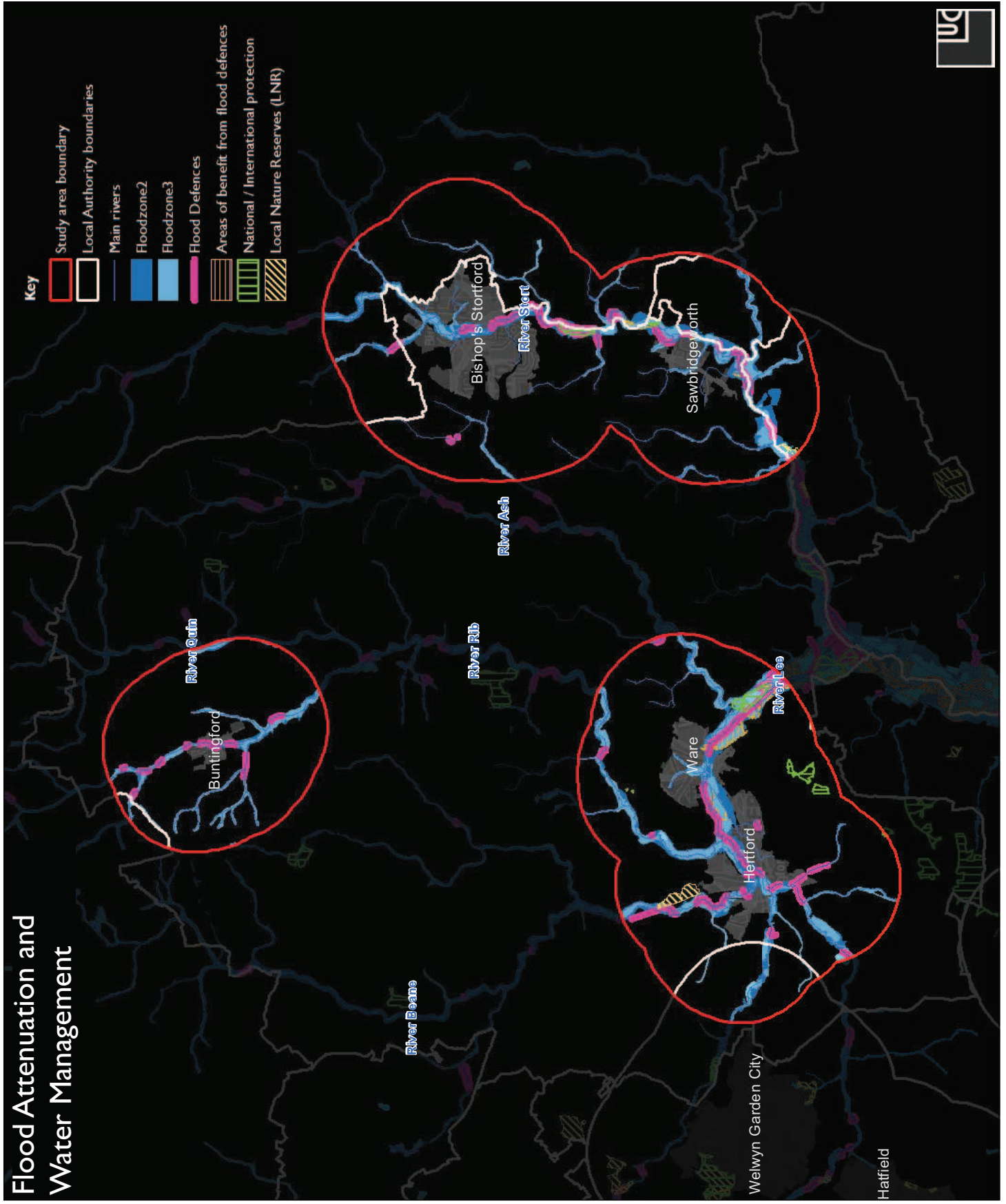


Nature Conservation





Flood Attenuation and Water Management



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- ⁱ Groundwork Hertfordshire 2004 **Trees Against Pollution: A Strategy for Tree Planting and Air Quality**
ⁱⁱ Hertfordshire County Council, 2001: **Hertfordshire Landscape Character Assessment**



EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL – 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

ASSESSMENT OF EAST HERTS SPORTS FACILITIES (MAY 2011)

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents for consideration and agreement the draft Assessment of East Herts Sports Facilities (ASF) and a range of recommendations and long term aspirations.

<u>RECOMMENDATION TO EXECUTIVE: to commend to Council that:</u>	
(A)	The draft Assessment of East Herts Sports Facilities be agreed and published:
(i)	as a technical study, forming part of the evidence base to inform and support the East Herts Local Development Framework;
(ii)	as a basis for informing future Development Control decisions concerning the development of, and developments affecting sports facilities; and
(iii)	as a basis for sports facility planning in the District.

1.0 Background

- 1.1 The Assessment of East Herts Sports Facilities (ASF), the subject of this report was presented to Community Scrutiny on 14 June 2011. The Community Scrutiny report recommended that the draft ASF be noted and agreed as planning guidance; and that the ASF be used to pursue external funding opportunities. It had the following recommendations:

RECOMMENDATION FOR COMMUNITY SCRUTINY:	
(A)	That the draft Assessment be noted and agreement given to use as planning guidance
(B)	That officers are asked to pursue external funding opportunities as appropriate

RECOMMENDATION FOR EXECUTIVE :	
(A)	That the views of Community Scrutiny Committee be considered
(B)	That the proposed recommendations/aspirations for indoor sports facilities be acknowledged and the Assessment be noted and published

- 1.2 East Herts is well served by a range of high quality, indoor and outdoor sports facilities. The ASF is about how the Council might make best use of its existing facilities and take advantage of external funding opportunities to add to this provision and help ensure it is better fit for purpose. It is not proposed that the Council adopt the recommendations (listed in **Essential Reference Paper 'B'**) in the Assessment as policy, but rather that they be acknowledged as aspirations. It is intended that the recommendations be delivered by sports providers in the commercial, voluntary and/or public sector and are not the sole responsibility of any one sector or agency.
- 1.3 In 2008, Sport England invited Councils in the south east area to attend workshops to discuss and join its Facilities Improvement Scheme (FIS). The ASF is one of the outcomes of this work and the subject of this report.
- 1.4 The purpose of the Assessment is to undertake a review of the current state of indoor and outdoor sports facilities in the District and to propose local planning standards as appropriate. In addition, it will inform future work on open spaces for sport and recreation, in line with the anticipated forthcoming Planning Policy Statement from Central Government on Creating Natural and Healthy Environments.
- 1.5 Led by the Planning Policy Team, a Steering Group was established with representatives from the Leisure, Contract Services, Community Projects and Property Teams and the East Herts Community Sports Network (CSN).

- 1.6 The scope of facilities included in the FIS and considered by the Steering Group, included: sports and leisure centres, swimming pools, sports halls, health and fitness centres, indoor tennis courts, indoor bowls rinks, athletics tracks, Artificial Grass Pitches (AGPs) and any specialist facilities. All sports facility providers have been included – commercial sector, voluntary and community sector, statutory and not-for-profit.
- 1.7 To develop the ASF, it was necessary to commission three reports:
- Facilities Planning Models (FPM),
 - An audit of all outdoor sport facilities in the form of an East Herts Playing Pitch Strategy (PPS) which looked at all outdoor sports facilities, multi use games areas and playing pitches; and
 - An audit and assessment of all indoor sports facilities within the district (ASF)
- 1.8 Further desk-based research was also conducted, including the consideration of population figures and housing growth, analysis of physical activity rates among East Herts residents and a survey of village halls and community centres.
- 1.9 The Facilities Planning Model (FPM) is a Sport England strategic modelling tool, for swimming pools, sports halls and Artificial Grass Pitches (AGPs). The model enables Officers to anticipate the future need for individual sports facility types as a result of population increases, such as that arising from a proposed development. Officers can then use the model's cost calculations as a starting point for negotiating developer contributions.
- 1.10 The PPS, which forms part of the ASF, was agreed by the Local Development Framework Executive Panel on 22 September 2010. It was agreed that the PPS would be used i) as a technical study, forming part of the evidence base, to inform and support the East Herts Local Development Framework; ii) as a basis for informing future Development Control decisions concerning development which affect playing pitches and outdoor sports facilities; and (iii) as a basis for informing the ASF (or as it was known at the time, the Sports Facility and Active Recreation Strategy or SFARS), and any Action Plans contained therein.
- 1.11 Working in partnership with an independent consultant Michael Presland, a draft ASF was prepared and given to the Community Projects Team to finalise and coordinate consultation with

stakeholders.

1.12 A consultation event, supported by the CSN, was held on the 27 January 2011 at Wodson Park Sports Centre where more than 20 representatives of local sports clubs attended. Representatives of National Governing Bodies of indoor sports and Village Hall/Community Centre Management Committees were also invited. A list of those consulted along with the notes from the event, is included in Appendix 1 of the full Assessment document, available on line at: www.eastherts.gov.uk/SportsFacilitiesAssessment

1.13 The ASF document provides:

- A comprehensive audit of the supply of, and demand for the various sports facility types in East Herts
- An analysis of the quantity and quality of existing indoor sports facilities in the district;
- Proposals on local standards of indoor sports provision for planning purposes;
- Consideration of the adequacy of existing provision against these standards;
- Recommendations on appropriate responses for each facility type; and
- An approach towards delivery and resources

2.0 Strategy Report

2.1 Comprised of 10 chapters, the Assessment contains the national and local context for sports and sets out the methodology of undertaking the desk-based assessment (Chapters 1 to 4).

2.2 Chapter 5 details the current level of built sports facilities provision and future needs using the planning tools described in Chapter 4. Each sports facility type contains a conclusion summarising the findings of the assessment for that facility and highlights where there are particular deficiencies in provision or quality that will need to be addressed, along with suggestions as to how to manage these issues in future.

2.3 Chapter 6 looks at the contribution village halls and schools make to the level of sport facility provision across the District. The report identifies the greatest need in the area of community use and working with partners to obtain best use of existing buildings.

2.4 Chapter 7 includes the previously agreed Playing Pitch Strategy

and Outdoor Sports Assessment.

- 2.5 Chapter 8 identifies the key issues, options and recommendations for indoor sports facilities. (A summary of these is contained in **Essential Reference Paper 'B'**). The recommendations are intended to ensure that the individual sports facility types are better fit for purpose and are suitable for the changing needs of a growing population and changing demographic. A key recommendation is to make more efficient use of existing facilities through improved management and promotion of opening times for example. Another method is the use of Community Use Agreements as a means of opening school facilities to the public when not needed for school activities.
- 2.6 Chapter 9 covers delivery through partnerships, including the CSN and local sports clubs, resources, planning gain and identifies local standards for indoor and outdoor sports provision. Chapter 10 concludes with a statement on monitoring and review.
- 2.7 Potential future work could include a fuller assessment into the availability of particular facilities (including schools) throughout the day, hours of usage, age and condition in order to facilitate better use of facilities and to inform a maintenance programme.
- 2.8 It is the intention that the Assessment of Sports Facilities will become a key part of the evidence base informing the development of the Core Strategy, Site Allocations and Development Management documents along with informing decisions on planning applications.
- 2.9 As a result of the robust approach to analysis and consultation, Sport England is very pleased with the overall strategy and, if adopted, will be using the East Herts document as a national good practice example of a sports facilities assessment.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

Summary: Assessment of East Herts Sports Facilities (May 2011)

Draft Assessment of Sports Facilities (May 2011)

East Herts Playing Pitch Strategy and Outdoor Sports Audit Strategy
Report (July 2010), Knight Kavanagh and Page

All are available online at www.eastherts.gov.uk

Hard copies can be made available for Members on request from the
Planning Policy Team or Community Projects Team.

Contact Member: Councillor M G Carver, Executive Member for
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Claire Pullen, Community Planning and
Partnerships Manager, Community Projects Team

ESSENTIAL REFERENCE PAPER 'A'

Contribution to the Council's Corporate Priorities/ Objectives:	<p>Promoting Prosperity and well being; providing access and opportunity <i>Enhancing quality of life, health and well being of individuals, families and communities, particularly those that are vulnerable</i></p> <p>Pride in East Herts <i>Improve standards of the built neighbourhood and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
Consultation:	27 January 2011 with East Herts Community Sports Network
Legal:	It is a statutory duty under the Planning and Compulsory Purchase Act 2004 for East Herts Council as the local planning authority to produce and keep up-to-date sound and robust Development Plan for the district. The Assessment of Sports Facilities forms part of the evidence base used to ensure the Local Development Framework is justifiable and deliverable.
Financial:	There will be on-going costs associated with the recommended policies and future technical work if this is undertaken. It is envisaged that future developments could be achieved through developer contributions and partnership working with sports clubs, governing bodies and facility managers.
Human Resource:	Depending on how the Assessment of Sports Facilities is taken forward there could be staffing implications in terms of providing a central resource for the management, co-ordination and promotion of the district's sports facilities.
Risk Management:	Failure to follow the recommendations contained in the Assessment may result in sports facilities that are inadequate for the 21 st century and not fit for purpose, leading to a decline in participation in sports and recreation

	<p>and resultant longer-term risks to the health and wellbeing of the district's residents and visitors.</p> <p>In order to be found sound the Core Strategy and other planning documents should be based on technical evidence and the views of the community and stakeholders. There is widespread support for raising the profile of sports clubs and increasing recreational activity. To not take the reports into account in the production of key planning documents could lead to challenges that they are unsound.</p>
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ESSENTIAL REFERENCE PAPER 'B'

Assessment of East Herts Sports Facilities - Proposed Recommendations/ Aspirations

SUMMARY AND CONTEXT

This Assessment shows that East Herts is well served by a range of high quality, indoor and outdoor sports facilities. In general, residents are currently satisfied with the sports and active recreation facilities on offer.

East Herts Council recognises the physical, mental and social benefits of sport and physical recreation and aims to encourage and enable “sport for all” through stimulation of interest, creating awareness and facilitating access to an active, healthy lifestyle through the provision of sports facilities. The Council will work in partnership with schools, local sports facilities providers and the voluntary sports club network to provide and improve opportunities for everyone to participate in the sport and active recreation of their choice and attain their desired level of performance.

The following recommendations and long term aspirations take into account the following factors:

- The population in East Herts is predicted to increase from 128,919 to 145,000 (by 2016) or 153,000 by 2021 (an increase of 11% and 15% respectively). The “active” population is expected to increase by 6% by 2021.
- It is anticipated that there will be a 24% rise in people over 65 years old by 2021 and expectations are changing: significantly people increasingly want to have more control over their own lives and how their needs are met. Older people are getting “younger” physically and mentally and therefore they will still be active, possibly more active than younger people as they have more time and disposable income to spend on leisure and sport.
- Residents of East Herts are generally affluent with a good level of health and quality of life though there are pockets of deprivation.
- There are 5 main towns and a large dispersed rural area and differential accessibility to facilities.
- Access to school sports facilities by the community is limited.
- Access to sports facilities in neighbouring local authority areas is good; and there is some import and export of demand across boundaries to each others’ sports facilities.
- Many of these factors combine to demonstrate that activity levels in sport in the district are higher than the national average. However, there is still less than

25% of the local population undertaking 30 minutes of exercise, three times a week, so participation could be improved – as per the new East Herts Public Health Action Plan.

- In terms of East Herts residents participation in sport, the condition of individual sports facilities has a higher than average impact on whether they are encouraged to take part. For those active in sport, improving performance is an important motivating factor.

ASSESSMENT AND RECOMMENDATIONS/ASPIRATIONS FOR INDIVIDUAL SPORTS FACILITY TYPES

The recommendations identified in the next pages could be delivered by sports providers in the commercial, voluntary and/or public sector and are not the sole responsibility of any one sector or agency. The medium/long term recommendations are aspirations for the future and would be pursued only if external funding opportunities become available or if the Council's financial situation changes.

SPORTS HALLS (Chapter 5):

Key Issues from the Assessment - There are 11 main sports halls with 3+ courts, and a number of smaller halls, although some are on school and education sites and may not offer full community access at all times. According to Sport England's Sports Facility Calculator, anticipated demand from within the district is for about nine 4-court halls.

The level of satisfied demand for sports halls in East Herts is high, but there is a small amount of unmet demand in the Hertford area, which might justify one additional hall, though this would be likely to drag demand in from outside the district. In addition, four of the existing main sports halls are operating at capacity, and additional space could therefore be considered, either on these sites by increasing capacity, or refurbishment, or by improving community access to other halls on nearby school sites.

Current provision of sports halls relies on all existing halls being available in some degree to community use. Better use of school halls is required to maintain this level of provision at present, and avoid existing halls being overused. It is estimated that there is unmet demand for the provision of one additional 4-court hall in Hertford.

Future provision - on the basis of the desirable level of current provision, it is estimated that up to 2.5 additional halls would be needed in the period up to 2021.

Proposed Recommendations/Aspirations

1. In the short term, there is demand for the development of a 4-court sports hall to meet the needs of Hertford, possibly on the basis of dual use with schools.
2. Retain and maintain the quality of the existing 'public' sports halls at Wodson Park Sports Centre in Ware, including ongoing maintenance and improvement to ensure continued community use and long term sustainability.
3. Maintain and improve community access to school sports halls throughout the district, using models of good practice for community use agreements.

4. Coordinated management and promotion of all halls throughout the district, possibly by the CSN, to ensure optimum availability for all different users, and support the appointment/identification of an organiser.
5. Establish a framework for the usage of all sports halls to ensure community use by the wider community, sports clubs, and other users, including defining particular halls for specialist use by clubs in a particular activity.
6. Ensure that all sports halls meet the needs of the widest range of users, including young people, women and the disabled by improved management and publicity.
7. Ensure that all sports halls are maintained and fit for purpose over the whole term of the strategy to 2021.
8. Work in partnership with Local Education Authority and local schools to ensure that any new sports hall – provided as part of a future schools investment programme – are planned and designed to meet community as well as school needs.
9. Plan for the specialist needs of individual sports when designing new or refurbished sports halls in consultation with sports national governing bodies in order to meet any sport specific or competition needs that are currently not being met.
10. Adopt Sport England design and technical guidance advice for quality standards for new sports halls.
11. In the medium/longer term, it is estimated that one additional larger (6 to 8 court) sports hall with full community access may be needed in the Bishops Stortford or a 4-court hall in the Buntingford area, depending on housing growth. This aspiration is dependent on external funding becoming available or a change in the Council's financial situation.

SWIMMING POOLS (Chapter 5)

Key Issues from the Assessment - There are 17 pools available in some measure to the wider community in East Herts, though only nine with four lanes or more. Of these, there are six main pay and play pools with 1750m² of water in the main pool, and a further three on school sites and mainly available for clubs and bookings with 750m² of water. If an allowance is made for pools not in secured community use, there is the equivalent of 2125m² or about 10 4-lane pools available for use in the district. Anticipated demand from within the district from Sport England's Sports Facilities Calculator is for about six 4-lane pools.

The level of satisfied demand for swimming in East Herts is very high, and additional pools are not required for this reason. There is spare capacity overall and at all individual pools. No additional pools are required at the present time.

Future provision - on the basis of current provision and spare capacity at existing pools, it is unlikely that additional water space is required to meet increased population growth, even taking into account increased participation rates. However, there will be issues of quality and possibly accessibility by then, and some consideration will need to be given to these in the future.

Proposed Recommendations/Aspirations

1. Retain and maintain the availability and quality of the main 'public' pools at Hartham, Grange Paddocks, and joint provision pools - Fanshawe, Ward Freman and Leventhorpe.

2. Seek to secure appropriate community usage of schools and other pools in the district.
3. Ensure that all different demands for swimming – casual, teaching, training, life saving, competition are catered for throughout the district in a coordinated manner and establish a hierarchy of pools to deliver this.
4. Endeavour to coordinate the management and promotion of all pools throughout the district to ensure optimum availability for all different users. Taking measures to spread the peak demand for swimming so that existing supply can ‘fit’ the variety of different demands on time.
5. Endeavour to ensure that all swimming pools meet the needs of the widest range of users, including young people, women and the disabled by improved management and publicity.
6. Further investigate/consult on whether there is a need for a district Aquatics Strategy and organiser to promote the maximum and profitable usage of all pool space.
7. Work in partnership with the owners of the joint provision pools to maintain and, where appropriate, further develop the joint use pools at Fanshawe, Ward Freman and Leventhorpe, in the face of the continuing and possibly increasing demand for water space arising from development initiatives and population increases.

HEALTH AND FITNESS CENTRES (Chapter 5)

Key Issues from the Assessment - There are 895 health and fitness stations throughout East Herts, of which about 800 are available to the wider community either through Pay-as-You-Play access, sports club use or by registered membership.

In accordance with the guidelines of the Fitness Industry Association, an estimated demand from the current population of the district would require about 670 stations in the district. Despite the calculations above, demand and supply are therefore considered to be in broad balance, and additional centres are not considered necessary at the present time.

Future provision - on the basis of the desirable level of current provision, up to 130 additional stations might be required for community usage up to 2021.

Proposed Recommendations/Aspirations

1. Maintain the current level and mix of facilities in the district.
2. Maintain and improve where necessary the quality of facilities in the district.
3. Seek to ensure that all health and fitness centres meet the needs of the widest range of users, including young people, women and the disabled by improved management and publicity.
4. In the longer term, it is estimated that there may be a demand for two to three 50-station centres, in accessible locations throughout the district, preferably in conjunction with other sports and community facilities including sports halls (especially on schools sites), pools, artificial grass pitches and village/community halls, to ensure that all facilities are sustainable in financial terms. This aspiration is dependent on external funding becoming available or a change in the Council's financial situation.

INDOOR BOWLS (Chapter 5)

Key Issues from the Assessment - There is no indoor bowls provision in East Herts. Despite the relatively good accessibility to facilities in neighbouring local authority areas, it would be appropriate to plan for the provision of new indoor bowls facilities in the district to bring local provision up to the county or national average, or in accordance with Sports England's Sports Facilities Calculator (based on the average participation rate at a national level.) It is not feasible, unless a local demand can be identified, to improve to the regional average which is very high. On this basis, the local population could justify 5 to 8 rinks, and this could be in two locations in the east and south of the district. Bowls is an activity especially popular in the 50 plus population.

Future provision - on the basis of the desirable level of current provision, up to three additional rinks might be required up to 2021.

Proposed Recommendations/Aspirations

1. In the short term, in conjunction with the existing outdoor provider and with the national governing body, further research the need for the development of a multi-use 4-to-6 rink facility in the Bishops Stortford area to meet existing demand which is currently met via a facility outside the district.
2. Work with the English Indoor Bowling Association and Bowls Development Alliance (operating in Hertfordshire) to promote the sport throughout the district as an activity which is particularly suitable for older people, given the future demographics of the area, while at the same time encouraging more participation by younger people.
3. In the longer term, it is estimated there will be demand for an additional multi-use 2-to-4 rink facility either in conjunction with the short term provision above or as a separate facility in the Hertford/Ware area, liaising closely with national governing body. This aspiration is dependent on external funding becoming available or a change in the Council's financial situation.

INDOOR TENNIS (Chapter 5)

Key Issues from the Assessment - Indoor tennis provision in East Herts is at about the regional and national average, though below the very high levels in Hertfordshire as a whole. (The county average provision is inflated by very high levels of court provision in Welwyn Hatfield, Hertsmere and St Albans.)

Unless there is any clear local demand for additional indoor tennis, it is unlikely that further provision can be justified at the current time.

Future provision - on the basis of the existing provision, up to one additional court might be required up to 2021, but this would depend on a local case being made.

Proposed Recommendations/Aspirations

1. Additional indoor tennis facilities are unlikely to be required unless there is an identified need for them.
2. Maintain existing facilities over the duration of the strategy to ensure they continue to be fit for purpose.

COUNTY SPECIALIST FACILITY REQUIREMENTS (Chapter 5)

Key Issues from the Assessment - The Active Hertfordshire Sports Facilities Strategy (2007-2016) highlighted a demand for a number of specialist facilities, which might be provided in East Herts. These include athletics, badminton, cricket, cycling, football, gymnastics, hockey, martial arts, netball, rugby union and volleyball. The information supplied in the county strategy is now several years old, and further consultation with county governing bodies of sport should be undertaken, so that the local implications of sport development plans and facility strategies currently being prepared can be assimilated in this document.

Proposed Recommendations/Aspirations

1. Wodson Park Sports Centre in Ware would be an appropriate venue for development as a centre of strategic sporting excellence due to its existing diverse provision and strong user base, as a venue for the development of any identified specialist facilities and for support facilities associated with these uses.
2. Incorporate specialist facilities for table tennis, badminton, basketball, volleyball or other sports within a hierarchy of sports halls (See Chapter 5) in a coordinated manner, particularly on school sites where management would be facilitated.
3. It is acknowledged that a range of specialist clubs (e.g. Bishops Stortford Judo) could work together to find and develop a suitable training venue.
4. Ensure that national governing bodies of sport be consulted for input on specialist needs when new facility proposals come forward.

VILLAGE HALLS/COMMUNITY CENTRES (Chapter 6)

Key Issues from the Assessment - There are 61 village halls and community centres in the district, which offer the opportunity for sport and recreation outside the main towns and where access to sports facilities is poorer. There is widespread usage for a range of activities and most halls are open in the evening allowing full community access. The majority of halls and community centres are in regular use, although most have some spare capacity.

There is no specific evidence for the total demand for village halls and community centres and further research is required. However, three quarters of halls have identified no demand that cannot be met. Most village halls are considered to be in good or excellent condition. Almost all halls have been improved in recent years and half of all halls plan further refurbishment in the future. Future plans are not, for the most part, intended specifically for sport, but opportunities for sport will benefit from general improvements.

Future provision - if the current standard of provision is projected into the future, there would be a requirement of between four to seven additional halls to meet the needs of the increased population. However, this needs to be related to the actual location of additional housing and its relationship to the current network of halls, and additional research is required to ascertain the appropriate gaps and future locations.

Proposed Recommendations/Aspirations

1. Seek to facilitate the maintenance and refurbishment of existing village and community halls as a suitable base for sports activities in the rural parts of the district through available capital grants.
2. Ensure that any major improvements to village halls in the future accommodate space suitable for indoor sport - as feasible
3. In the longer term, it is anticipated there may be a need for the provision of four to seven additional village halls in locations which best meet the needs of the rural population, and in conjunction with new housing development. This aspiration is dependent on external funding becoming available or a change in the Council's financial situation.

PLAYING PITCHES AND OTHER OUTDOOR SPORTS (Chapter 7)

No summary is attached here as this relates to the East Herts Playing Pitch and Outdoor Sports Strategy which has already been agreed by the Council. The Playing Pitch strategy includes such facilities as outdoor tennis, netball, bowls, multi use games areas (MUGAs) as well as Artificial Grass Pitches and Athletics Tracks and the proposed agreed policies are shown below.

ARTIFICIAL GRASS PITCHES (AGPs)

Key Issues from the Assessment - There are eight full-size AGPs (synthetic/artificial all weather pitches) in East Herts, seven in some form of community use, although most of these are on school and education sites and may not offer full community access at all times. Anticipated demand from within the district from the Sports Facilities Calculator is for about four pitches in total.

Additional AGPs in East Herts cannot be justified at present, but some spare capacity would be released by additional pitch construction in neighbouring towns and districts.

Future provision - on the basis of the existing provision, one additional pitch in community use might be required up to 2021.

Proposed Recommendations/Aspirations

1. Maintain and enhance the existing use of AGPs throughout the district to meet the current needs for hockey, football and other activities and ensure the maximum use of school facilities by the wider community.
2. Require that all new pitches are maintained with a sinking fund in place, to ensure that the surface is replaced at least every 10 years, and all pitches remain fit for purpose.
3. Investigate the need for the provision in the longer term of one additional new pitch, built to 3G specification to meet Football Association requirements, in the area of highest housing growth.
4. In the short term, it is estimated that there may be a need for the provision of a facility suitable for the development of small sided football in the short term.
5. Ensure that any new pitch is associated with any necessary changing and clubhouse facilities to facilitate club development.

6. Embrace any new technology which ensures that pitches can be used by a wider range of sports e.g. 4th Generation pitches, when existing pitches reach the end of their life or are considered for refurbishment.

These conclusions are compatible with the results of the Playing Pitch and Outdoor Sports Strategy which concluded that “it is not thought that current or future demand for hockey will attribute to the need for more AGP provision in East Herts. Accessibility and management issues at existing sites are more of priority to tackle.”

ATHLETICS TRACKS

Key Issues from the Assessment - There is one athletics track in the district with eight lanes. Athletics provision in the district is better than the average, and most residents of the borough can gain access to a track within a reasonable drive. The track is understood to be in good condition and was recently refurbished. There is little justification in further provision for athletics at present, although as athletics is primarily a club-based sport, any local sports development factors would need to be considered.

Future provision - on the basis of the existing provision, up to 2 additional lanes might be required up to 2026. These levels of additional provision cannot be met alone, but depending on sports development factors, consideration might be given to a smaller training track or J-track in the north of the district, around Buntingford, possibly in conjunction with a developing school site.

Proposed Recommendations/Aspirations

1. Maintain and enhance the existing 8-lane track at Wodson Park Sports Centre in Ware as the centre for athletics in the district.
2. If demand increases in the future, there may be a need for the provision of a smaller training track or J-track in the north of the district as a satellite facility for athletics in the rural area, preferably on a school site.

These conclusions are compatible with the results of the Playing Pitch and Outdoor Sports Strategy.

DELIVERY (Chapter 9)

As listed above, the Assessment has identified a range of recommendations/aspirations that would meet anticipated and future demand for sports facilities. Action on these recommendations will depend on the following factors:

- Funding and procurement – the availability of finance from a variety of sources, borrowing, grant aid, partnerships, private sector funding, procurement competitions, joint ventures and other arrangements
- New planning legislation, such as the Community Infrastructure Levy (CIL)
- The development of planning policies and inclusion of these in the Core Strategy and ongoing Local Development Framework
- Planning contributions from developers towards essential community infrastructure including sports facilities

The strategy should be guided by a steering group specifically set up for the purpose, and this should base its considerations on the action plan (to be prepared).

REVIEW AND MONITORING (Chapter 10)

The Assessment is relevant in the current situation and represents a snapshot from 2010. It is essential that the document is constantly monitored and reviewed on an annual basis, and a comprehensive review undertaken in 2016.

Appendix 1: List of Attendees at consultation event 27 January 2011

John Hornby, Indoor Bowls
John O'Brien, Hertford Swimming Club
Margaret Carrier, Swim 21 Coordinator
Linda Ashley, Herts Leopards Basketball Club
Tim Saunders, Head of PE, Richard Hale School
Perry Oliver, Bishops Stortford Rugby Club
John O'Callaghan, Active East Herts Community Sports Network
Janet Warrington, Hoddesdon Swimming Club
Andrew Wilesmith, Eastern Region Judokwai
Sarah Jackson, Bishops Stortford Judokwai
Nicole Nunn, Bishops Stortford Judokwai
Debbie Evans, School Sports Development Officer
Jan Wood, School Sports Development Officer
Rhys Loveday, School Sports Development Officer
Will O'Neill, East Herts Council
Roy Warren, Sport England
Michael Presland, Sport England consultant
Jenny Pierce, East Herts Council
Claire Pullen, East Herts Council
Valdis Belinis, East Herts Council

Invitations were sent to members of the East Herts Community Sports Network, village halls and community centres, national governing bodies of sports and the Director of Sport at Amwell View (Special School) and Disability Hertfordshire.

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EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL – 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

LOCAL DEVELOPMENT FRAMEWORK MORPHOLOGY AND PLACE SHAPING (MAPS) TECHNICAL STUDY

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- The Morphology and Place Shaping (MAPS) technical study aims to embed a settlement-wide approach to design in the East Herts Local Development Framework (LDF). This report seeks endorsement from Members to agree the Project Plan.

<u>RECOMMENDATION TO EXECUTIVE:</u> to commend to Council that:
settlement-wide design based technical work is undertaken to inform the preparation of the East Herts Local Development Framework, and the Morphology and Place Shaping (MAPS) Technical Study Project Plan, contained at Essential Reference Paper ‘B’ to this report, be agreed.

	settlement-wide design based technical work is undertaken to inform the preparation of the East Herts Local Development Framework, and the Morphology and Place Shaping (MAPS) Technical Study Project Plan, contained at Essential Reference Paper ‘B’ to this report, be agreed.

1.0 Background

- 1.1 Good design is increasingly being seen as an important part of the planning and plan-making process. Indeed, design is more than simply what a building looks like: design is about the way neighbourhoods function as social environments and how they affect people's lives.
- 1.2 It is important therefore, that design is embedded into the East Herts Local Development Framework (LDF). The Council is currently preparing the Core Strategy Development Plan Document (DPD): the strategic and over-arching planning policy document in the East Herts LDF. Thus, the Morphology and Place Shaping (MAPS) study seeks to embed settlement-wide

design into the Core Strategy.

- 1.3 As Planning Policy Statement 3: Housing (PPS3) notes, good design can be described as design that is appropriate to its context and makes the most of opportunities available for improving the character and quality of an area and the way it functions.
- 1.4 It is clear, therefore, that an understanding of context forms the basis of good design. The MAPS study provides that context on a settlement-wide scale by providing an evidential understanding of how a town functions, its character and how it should evolve. MAPS also dovetails neatly with the Government's localism agenda in that it seeks to ensure that development is locally distinctive.
- 1.5 Fundamentally, MAPS is a study of built-form and urban design. Whilst it is acknowledged that the terms morphology and place shaping constitute planning jargon, they do nonetheless (along with the acronym itself) accurately and succinctly describe the purpose of this study. The terms have also been used because the former is the means of achieving the latter. Indeed, one cannot successfully shape places until the morphology of the place has been examined and understood.
- 1.6 Morphology is the study of settlements and built form. It seeks to understand the structure and character of a place by examining the patterns of its component parts and the process of its development.
- 1.7 Place shaping is an aspect of planning that is specifically concerned with creating attractive, prosperous and safe communities; places where people want to live, work and do business. It is about embedding design considerations into the planning process.
- 1.8 The LDF must also be based on robust and credible evidence (Planning Policy Statement 12: Local Spatial Planning). It is considered appropriate therefore, that a Project Plan is prepared that sets out the agreed methodology for undertaking settlement-wide design work. The MAPS Project Plan is attached as **Essential Reference Paper B**.

2.0 Report

- 2.1 The key aspects of the MAPS Project Plan are set out below. In terms of the methodology itself, a two-stage approach is proposed: Stage 1 - Morphology considers the character, form and functionality (or context) of each settlement and then using this information, Stage 2 - Place Shaping analyses how each settlement can positively accommodate future development.

Extent of the Study

- 2.2 Using the Issues and Options consultation document as its basis, the MAPS study will initially cover the following settlements.

- Bishop's Stortford
- Buntingford
- Hertford
- Sawbridgeworth
- Ware

Should further settlements be identified for significant growth following the Issues and Options consultation, the study will be extended to cover those settlements.

Resources and Quality Assurance

- 2.3 This study will be undertaken using existing in-house resources within the Planning Policy Team. It is also proposed that a Quality Assurance Group (QAG) is set up consisting of specialist officers from the Council's Development Control, Conservation and Landscape Services. Whilst these officers will not undertake any of the MAPS work, this group will review the outputs of the study as part of quality assurance.

Stakeholder Engagement

- 2.4 Following completion of Stage 1 - Morphology, it is proposed to engage with local District Councillors, Town Councils and civic societies in the respective towns to get their feedback and impressions about the characterisation work. It is envisaged that a MAPS working group will be established for each settlement. Each working group will be made up of two or three representatives from each organisation and will then provide feedback on Stage 2 - Place Shaping.
- 2.5 This engagement will ensure that the study is robust by obtaining valuable community feedback as to the character of the town and how it functions. The feedback will provide an important 'reality-

check' to the study, although when engaging with community representatives, it will be essential to be clear about both the objectives and limitations of the study and reiterate the role and purpose of the Core Strategy. The findings of the study will also be subject to wider public consultation as part of the Core Strategy Preferred Options stage.

Stage 1 - Morphology

2.6 Stage 1 looks at the settlement in its landscape context as well as its built environment or townscape. The work for both aspects of Stage 1 involves a review of existing geographic information (using the Council's existing Geographic Information System (GIS) software) followed by additional survey fieldwork. Survey information will be supported by photographic evidence.

2.7 The following information will be collated:

Landscape Information:

- Geography
- Topography
- Green Infrastructure
- Rivers and flooding
- Agricultural land classifications
- Key landscape features
- Landscape Sensitivity
- Landscape Capacity

Townscape Information:

- Settlement evolution
- Existing land use
- Heritage assets
- Landmark buildings
- Accessibility to key services
- Connectivity
- Network of routes
- Built-form

Stage 2 - Place Shaping

2.8 Utilising the morphology information from Stage 1, Stage 2 will apply it to the settlements to give an analysis of how the settlement can positively accommodate future development (i.e. place shaping). There are also two aspects to Stage 2. The first relates to the existing built-up area and seeks to broadly characterise the settlement into its component parts, providing guidance on how the existing town could accommodate development.

2.9 The following five standard PLACE zones have been identified and these will be applied to each settlement. Whilst it is acknowledged that every town is unique in its appearance and character, when looking at the settlement as a whole there are common features shared by all towns, reflecting the way that market towns have evolved over the centuries.

- **Peripheral Commercial Zone**
- **Living / Suburban Zone**
- **Access Corridor Zone**
- **Core Commercial Zone**
- **Edge of Centre Zone**

2.10 A series of PLACE Zone summaries will provide more detailed descriptions of the specific characteristics of these areas within each settlement. However, these summary descriptions of the zones will not be a detailed account nor will they be prescriptive in terms of built-form and design. Such information would not be appropriate for inclusion in the Core Strategy and should be included in a detailed design Supplementary Planning Document (SPD). Instead the summaries should seek to capture the flavour and atmosphere of the area to inform the principles of design and development in each identified settlement. These summaries will also help inform the design and integration of new areas for development.

Place Shaping and the Green Belt

2.11 The second aspect provides guidance in respect of how development could be accommodated on the periphery of the settlement. This will entail looking at greenfield and Green Belt locations.

2.12 However, it should be stressed that the inclusion of an area within the MAPS study is not an indication that it will come forward for development: that is a policy decision to be made through public consultation and the preparation of the LDF. The MAPS study simply informs that process by providing technical evidence as to which locations (if any) are most suitable from a settlement-wide design perspective.

2.13 It should be noted however, that the MAPS study does not consider Green Belt designation. Importantly, whilst Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection.

2.14 Notwithstanding this, whilst Green Belt considerations should not influence a design-based study, it would be disingenuous not to acknowledge the role that Green Belt designation plays when looking at settlement-wide design. It is expected that a separate Green Belt study will be undertaken for East Herts, although the

findings from this study will inform that work as appropriate, particularly in respect of the character of historic towns.

Outputs

- 2.15 The main output will be a MAPS Report for each identified settlement. In addition, to fieldwork and survey information, each report will also make recommendations, presented as follows:
- A plan that identifies the townscape character zones and the locations where development could be accommodated from a settlement-wide design perspective
 - Summaries of each townscape character zone that describe the key features of each zone and any areas of opportunity
 - Design-led principles for accommodating development including peripheral development and setting out how connectivity could be improved
- 2.16 Importantly, it should be stressed that the MAPS study itself does not constitute planning policy nor necessarily represent the intentions of East Herts Council. Once completed, the MAPS Reports will form part of the evidence base for the East Herts LDF and will simply inform decisions in respect of settlement-wide design and shaping the future of East Herts to 2031.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

- Planning Policy Statement 3: Housing (PPS3), CLG, June 2010
- Planning Policy Statement 12: Local Spatial Planning (PPS12), CLG, 2008

Contact Member: Councillor M G Carver, Executive Member for Planning Policy and Economic Development

Contact Officer: Kevin Steptoe, Head of Planning and Building Control - Ext 1407

Report Author: John Careford, Senior Planning Policy Officer

ESSENTIAL REFERENCE PAPER 'A'

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>Pride in East Herts <i>Improve standards of the built neighbourhood and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p>
Consultation:	Engagement with appropriate stakeholders as required.
Legal:	N/A
Financial:	LDF technical work is being funded from the Planning Policy / LDF Upkeep Budgets.
Human Resource:	Existing Planning Policy staff resources will undertake this study.
Risk Management:	In order to be found sound at examination, it is essential that the Core Strategy should be based on a robust evidence base.

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Morphology and Place Shaping (MAPS)

A study of built form and urban design

Project Plan

July 2011

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1.0 Background and Purpose

Purpose

- 1.1 This Project Plan sets out the methodology for undertaking a Morphology and Place Shaping Study (MAPS) for East Herts district; a piece of technical work that will inform the East Herts Local Development Framework (LDF) in respect of settlement-wide design. It is part of the proactive plan-making process that will shape the future of East Herts to 2031, by helping to ensure that all new development is appreciative of its context.
- 1.2 The purpose of the MAPS study is to establish a set of guiding design principles setting out how each identified settlement can positively accommodate future development. In short, it aims to adopt a settlement-wide approach to design.

What is Morphology and Place Shaping?

- 1.3 Whilst slightly 'jargonistic', the terms morphology and place shaping accurately and succinctly describe the purpose of this study. The terms have also been used because the former is the means of achieving the latter. Indeed, one cannot successfully shape places until the morphology of the place has been examined and understood.
- 1.4 Morphology is the study of settlements and built form. It seeks to understand the structure and character of a place by examining the patterns of its component parts and the process of its development.
- 1.5 Place shaping is an aspect of planning that is specifically concerned with creating attractive, prosperous and safe communities; distinctive places of quality where people want to live, work and do business. It is about embedding design considerations into the planning process.

The Importance of Good Design

- 1.6 Ensuring good design is rightly an increasingly important aspect of planning and plan-making. There is also a growing recognition that design is about the way neighbourhoods function as social environments and how they affect people's lives, rather than being a purely site-based concern.
- 1.7 Good design is about making places that are functional, durable, viable, good for people to use and reflect the importance of local character and distinctiveness¹. Good design can be described as design that is appropriate to its context and makes the most of opportunities available for improving the character and quality of an area and the way it functions². Indeed, planners should give the role of design in shaping overall urban form and the pattern of urban development much more attention.³
- 1.8 It is clear, therefore, that an understanding of context forms the basis of good design. The MAPS study provides that context on a settlement-wide scale by providing an evidential understanding of how a town functions, its character and how it should evolve.

¹ Page 11, Making Design Policy Work (CABE, June 2005)

² Based on Paragraph 13, PPS3 (CLG, June 2010)

³ Page 10, Making Design Policy Work (CABE, June 2005)

Localism and the LDF

1.9 Local Development Frameworks (LDF) are the vehicle for spatial, as opposed to purely land-use, planning. The MAPS study helps to fulfil the following LDF objectives:

- Understanding how our towns and villages function as places;
- Identifying a vision for what we want our communities to be like in the future;
- Achieving that vision through delivering planned growth and managing change;
- Realizing sustainable development by balancing competing social, economic and environmental needs;
- Moving away from traditional land-use planning to a wider approach of managing the built environment; and,
- Encouraging good design and adopting a settlement-wide approach to design.

1.10 MAPS also re-enforces the new 'localism' agenda because not only is it based on an understanding of the unique context of a particular place, but because it seeks to find specific solutions to delivering growth and managing change.

MAPS and the Core Strategy

1.11 East Herts Council is currently preparing its Core Strategy; the first and arguably most important Development Plan Document (DPD) in the East Herts LDF since it will set the overarching strategy and principles for development across East Herts.

1.12 Core Strategy Issues and Options consultation ran from 2nd September to 25th November 2010. Work is currently progressing on the preparation of the next stage of the Core Strategy called Preferred Options: essentially the draft document.

1.13 Given its strategic purpose, the fundamentals of design policy should be set out in the Core Strategy, including for example⁴;

- The need to follow a robust design process, clearly demonstrated in the Design and Access Statement submitted as part of the planning application;
- Basing proposals on a clear understanding of context, at every scale through the site, street, neighbourhood and settlement levels; and,
- The contribution of better design to achieving sustainable development objectives.

1.14 The Core Strategy should also consider the settlement in its wider context and consider the settlement as a whole when allocating land for development and deriving a vision for its future. A good Core Strategy needs to tell the story of the place. The story can be told by⁵:

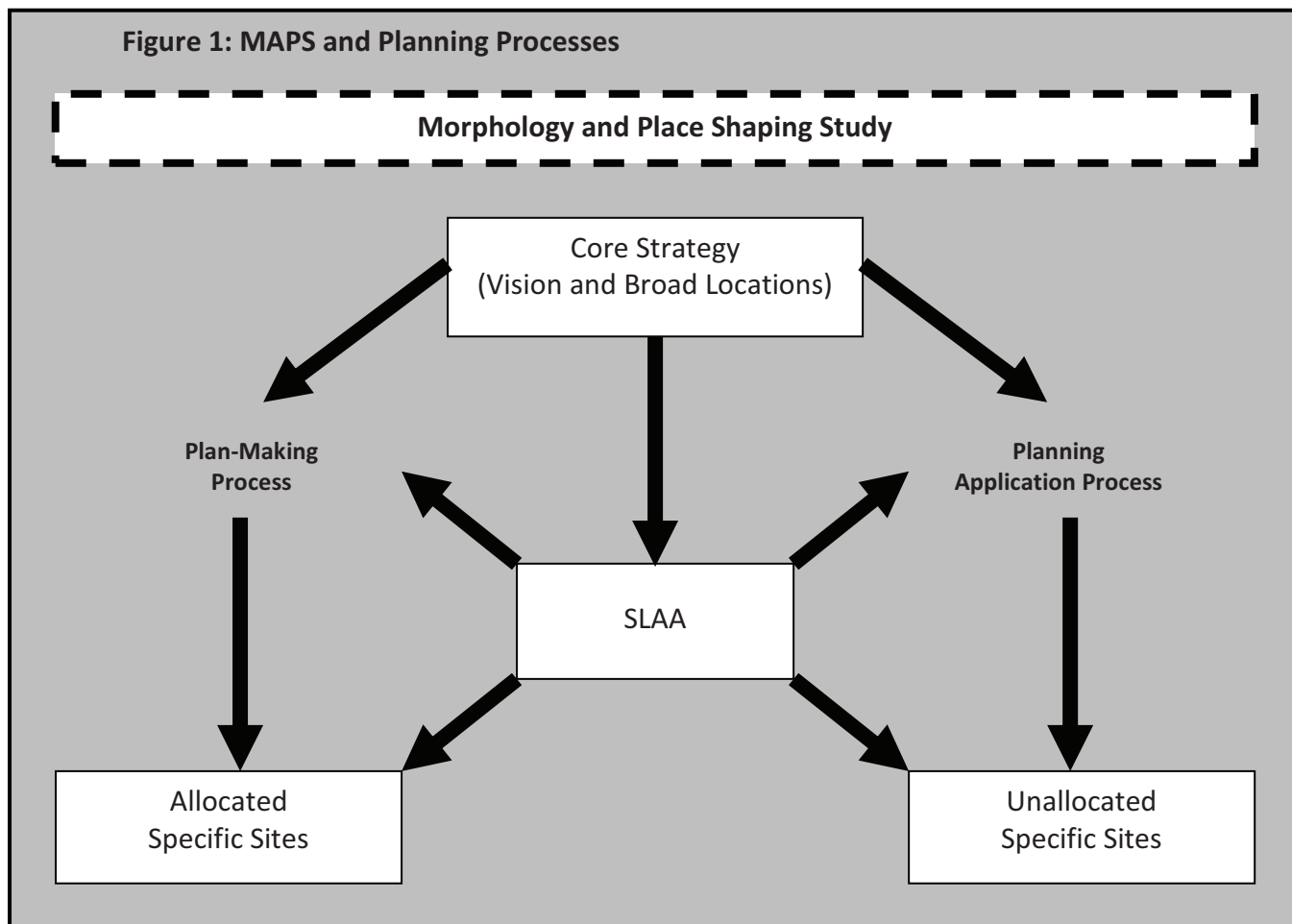
- Explaining the important history, context and physical characteristics of the area;
- Talking about the people who live there;
- Describing how the area functions;
- Understanding the relationships that exist with the wider area;
- Understanding the opportunities a place offers.

⁴ Page 13, Making Design Policy Work (CABE, 2005)

⁵ Page 7, Planning for Places: Delivering Good Design Through Core Strategies (CABE, 2009)

2.0 Using the MAPS Study

- 2.1 As shown in Figure 1, the MAPS study will inform a number of inter-linked aspects of the plan-making process that sit across a number of different planning documents and processes.



- 2.2 By following an agreed methodology the MAPS study demonstrates a real and robust understanding of place that withstands scrutiny. It also embeds the principles of design, character and context into considerations about sustainable development.

Core Strategy

- 2.3 The Core Strategy is the overarching and strategic planning document that will set the principles for development. It is therefore appropriate that the MAPS study feeds directly into the Core Strategy itself rather than simply another DPD or Supplementary Planning Document (SPD).
- 2.4 The MAPS study will inform a number of inter-linked aspects of the plan-making process (as shown in Figure 1 above). It is therefore appropriate that the Core Strategy, which sets the strategic context for these subsidiary documents, includes the outcomes of morphology and place shaping technical work. In addition, whilst SPD are the appropriate documents for detailed and/or site specific design policy and guidance, they do not carry sufficient material weight given the policy setting role that place shaping needs to have, sitting at the centre of the East Herts LDF.

- 2.5 Indeed, from the evidence gathered to-date, maintaining and enhancing the character of East Herts is a key objective of the East Herts LDF. Whilst the Core Strategy Issues and Options consultation document already includes context maps for each of the five towns, the MAPS study takes this context work forward to the next stage and undertakes a more detailed assessment of landscape setting, townscape character, structure and function.

Core Strategy: Visioning and Broad Locations

- 2.6 The Core Strategy vision and key diagram form the starting point for future planning in East Herts. Together, they set out the key principles for how the district should develop as well as identifying the broad locations for development. The MAPS study will inform the key diagram and vision for East Herts in addition to supplementing the strategic objectives of the Core Strategy.
- 2.7 Because the MAPS study looks town-wide, it will enable broad locations for development to be assessed in their widest context rather than simply on a site basis, thus ensuring that the broad locations for development are truly sustainable.

Strategic Land Availability Assessment (SLAA)⁶

- 2.8 The SLAA is a piece of ongoing technical work that will inform the LDF in respect of land supply and assist, as appropriate, in determining planning applications. In essence, the SLAA will be a report listing sites proposed for development that includes an assessment of the suitability, availability and achievability of each site for development.
- 2.9 A site is considered *suitable*⁷ for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. In considering suitability, policy restrictions, physical constraints, potential impacts of developing the site and the environmental conditions which would be experienced by prospective residents should all be considered. The MAPS study will contribute to the assessment of site suitability because it provides a robust and pre-agreed context framework that can be applied consistently.

Allocated Specific Sites

- 2.10 Through the LDF, specific sites will be allocated for development. The Site Allocations DPD will set out the Council's policy requirements, including type and mix of development and any on-site requirements, in respect of these specifically allocated sites. The purpose for allocating sites is to help deliver the Council's vision and planning objectives for East Herts. The MAPS study will provide evidence to ensure that allocated sites do not only comply with, but actually help deliver the vision.
- 2.11 It is intended that Concept Statements will be prepared for many, if not all, of the housing allocations in the Site Allocations DPD. It is incompatible with the principles of sustainable development to release building land without a specification for the scheme to be developed on that land. It might be the right site, but without robust guidance there is no guarantee that development will result in the right scheme.

⁶ See also Strategic Land Availability Assessment: Project Plan, (East Herts Council, July 2010)

⁷ Paragraph 54, Planning Policy Statement 3: Housing (PPS3) (CLG, 2010)

- 2.12 The MAPS study ensures a robust and pre-agreed design context framework that can be applied consistently to each Concept Statement, giving added weight to the robustness of each individual Concept Statement.

Unallocated Specific Sites

- 2.13 Over the life of the Core Strategy, a number of unallocated sites will come forward for development. In determining planning applications on these sites, consideration will need to be given as to whether the site fulfils the objectives of the vision and is in a suitable broad location.
- 2.14 Again, the MAPS study will provide the evidence that will form the basis of any decision. Design consideration should also be demonstrated in the Design and Access Statement (DAS)⁸ submitted as part of the planning application. This statement should 'tell the design story' of the scheme and demonstrate how the proposed design is the appropriate response to the particular context of the site.
- 2.15 By setting out the strategic design context through the MAPS study, much of the background work for preparing and determining planning applications will have been done. It will help ensure not only a robust and pre-agreed context framework, but also that every assessment is applied consistently. Such an approach is beneficial to those preparing planning applications and gives certainty to the development management process.

⁸ Required by DCLG Circular 01/2006 - Guidance on Changes to the Development Control

3.0 Methodology

Overview of Methodology

- 3.1 The methodology for the MAPS study involves two key stages. The first is to undertake an assessment or evaluation of settlement character and form (i.e. morphology). The detailed methodology is set out in Section 4.0 of this report. The second stage applies the morphology information from Stage 1 to the settlements to give an analysis of how the settlement can positively accommodate future development (i.e. place shaping). The detailed methodology is set out in Section 5.0 of this report.
- 3.2 The work for both Stages involves a review of existing geographic information (using the Council's existing Geographic Information System (GIS) software) followed by additional survey fieldwork. Survey information will be supported by photographic evidence.
- 3.3 The geographic information upon which the MAPS study is based is explained under the relevant Stage in Sections 4.0 and 5.0, as appropriate, and includes for example existing environmental and heritage designations.

Green Belt

- 3.4 It should be noted however, that the MAPS study does not consider Green Belt designation. The rationale for this approach is that Green Belt is a policy designation; the fundamental aim of which is to prevent urban sprawl by keeping land permanently open.⁹ Importantly, whilst Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection.¹⁰
- 3.5 Notwithstanding this, whilst Green Belt considerations should not influence a design-based study, it would be disingenuous not to acknowledge the role that Green Belt designation plays when looking at settlement-wide design. There are five purposes¹¹ to including land in Green Belts, and together, for those settlements within the Green Belt, they have fundamentally affected settlement design:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns from merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and,
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.6 It is anticipated that a separate Green Belt study will be undertaken for East Herts, although the findings from this study will inform that work as appropriate, particularly in respect of the character of historic towns.

Extent of Study

- 3.7 Using the Issues and Options consultation document as its basis, the MAPS study will initially cover the following settlements. Should further settlements be identified for

⁹ Paragraph 1.4, Planning Policy Guidance Note 2: Green Belts (PPG2), DCLG, 2001

¹⁰ Paragraph 1.7, Planning Policy Guidance Note 2: Green Belts (PPG2), DCLG, 2001

¹¹ Paragraph 15, Planning Policy Guidance Note 2: Green Belts (PPG2), DCLG, 2001

significant growth following the Issues and Options consultation, the study will be extended to cover those settlements.

- Bishop's Stortford
- Buntingford
- Hertford
- Sawbridgeworth
- Ware

Timeline and Resources

- 3.8 This study will be undertaken using existing in-house resources within the Planning Policy Team. Figure 2 sets out the anticipated broad timetable for the completion of the MAPS study, with work being undertaken around other planning policy work commitments.

Figure 2: Project Timetable

	APR 11	MAY 11	JUN 11	JUL 11	AUG 11	SEP 11	OCT 11	NOV 11	DEC 11	JAN 12	FEB 12
Project Plan Preparation & Sign-off											
Stage 1a - Landscape Survey											
Stage 1b - Townscape Survey											
Stakeholder Engagement - Stage 1											
Project Review											
Stage 2a - PLACE Zones											
Stage 2b - Peripheral Place Shaping											
Stakeholder Engagement - Stage 2											
Input into SLAA											
Preferred Options Preparation											

- 3.9 It is also proposed that a Quality Assurance Group (QAG) is set up consisting of specialist officers from the Council's Development Control, Conservation and Landscape Services. Whilst these officers will not undertake any of the MAPS work, this group will review the outputs of the study as part of quality assurance.

Stakeholder Engagement

- 3.10 Following completion of Stage 1 - Morphology, it is proposed to engage with local district councillors, town councils and civic societies in the respective towns to get their feedback and impressions about the characterisation work.
- 3.11 It is envisaged that a MAPS working group will be established for each settlement. Each working group will be made up of two or three representatives from each organisation and will then provide feedback on Stage 2 - Place Shaping.
- 3.12 This engagement will ensure that the study is robust by obtaining valuable community feedback as to the character of the town and how it functions. The feedback will provide an important 'reality-check' to the study, although when engaging with community

representatives, it will be essential to be clear about both the objectives and limitations of the study and reiterate the role and purpose of the Core Strategy.

- 3.13 The findings of the study will also be subject to wider public consultation as part of the Core Strategy Preferred Options stage.

Risk Management

- 3.14 As stated above, when engaging with community representatives, it will be essential to be clear about both the objectives and limitations of the MAPS study and reiterate the role and purpose of the Core Strategy, especially in respect of Stage 2 - Place Shaping. The MAPS study will simply inform decisions in the Core Strategy.
- 3.15 Any fieldwork undertaken as part of this study has the potential to pose a number of risks including contact with members of the public. However, these risks are not considered to be any greater than those risks usually associated with undertaking planning site visits or survey work. The fieldwork and surveys will be undertaken from public land and public rights of way. Copies of an explanatory letter should also be made available to inquisitive members of the public, as appropriate.
- 3.16 Survey work will be undertaken by car, on foot and possibly by bicycle, responding to the need to cover a large geographical area efficiently and effectively inline with the principles of undertaking an Outline Assessment. Appropriate safety clothing should be worn when cycling. Undertaking survey work is also subject to weather conditions and should not be carried out if there is a risk of bad weather such as heavy rain, fog, snow or ice. It is expected that the fieldwork will entail a substantial amount of walking and surveyors should be physically fit.

Outputs

- 3.17 The main output will be a MAPS Report for each identified settlement. In addition, to fieldwork and survey information, each report will also make recommendations, presented as follows:
- A plan that identifies the townscape character zones (see Section 4.0) and the locations where development could be accommodated from a settlement-wide design perspective (see Section 5.0)
 - Summaries of each townscape character zone that describe the key features of each zone and any areas of opportunity (see Section 4.0)
 - Design-led principles for accommodating development including peripheral development and setting out how connectivity could be improved
- 3.18 Importantly, it should be noted that the MAPS study itself does not constitute planning policy nor necessarily represent the intentions of East Herts Council. Once completed, the MAPS Reports will form part of the evidence base for the East Herts LDF and will simply inform decisions in respect of settlement-wide design and shaping the future of East Herts to 2031.

4.0 Stage 1 - Morphology

- 4.1 Stage 1 assesses the character, form and functionality (i.e. morphology) of each identified settlement. Stage 1 looks at the settlement in its landscape context as well as its built environment or townscape.
- 4.2 The work for both aspects of Stage 1 involves a review of existing geographic information (using the Council's existing GIS software) followed by additional survey fieldwork. Survey information will be supported by photographic evidence.

Landscape

- 4.3 A settlement is more than just the sum of its parts and understanding the totality of a place and its setting within its wider landscape is crucial in understanding the story of a settlement and its context. The following information will be collated and mapped:
- *Geography* - the location of the settlement within East Herts and the key transport routes (e.g. railway, primary roads, bus routes)
 - *Topography* - landform, land height, valleys and ridgelines, and views towards the settlement
 - *Green Infrastructure* - environmental assets including wildlife sites, key biodiversity areas, Sites of Special Scientific Interest (SSSI), national and European important wildlife sites
 - *Rivers and flooding* - water-based environmental assets such as rivers, and areas of flood risk which may limit or restrict development opportunities
 - *Agricultural land classifications* - broad areas showing indicative classification of agricultural land (this information should not be used on a site specific basis)
 - *Key landscape features* - natural features including hedgerows and areas of woodland, and man-made features such as key buildings/structures in the landscape and views of such features
 - *Landscape Sensitivity* - an assessment of the ability of the landscape to accommodate built development, including landscape character (as set out in the East Herts Landscape Character Supplementary Planning Document) and the relationships at the urban/rural fringe (e.g. how the 'town meets the countryside' and any positive/negative boundary relationships)
 - *Landscape Capacity* - a subjective assessment that takes account of sensitivity and value judgements as to how much development could be accommodated in the landscape

- 4.4 Fieldwork will be undertaken through a landscape survey to corroborate information identified through the desk-top survey and to undertake a preliminary landscape sensitivity and capacity assessment. A visual survey will be undertaken and information will be recorded on a standard Assessment Pro-forma (attached at Appendix A). The use of a standard Pro-forma ensures that the information will be recorded consistently. Information will also be recorded on OS base maps and photographs taken.
- 4.5 The assessment of landscape sensitivity and capacity is the standard approach for assessing how landscapes can best accommodate development, although the techniques are still evolving. Definitions as used by Natural England¹² are set out in Figure 3. A key point to note is that both assessments should be undertaken in the context of the particular type of development proposed. Thus, the MAPS study considers the impact of built development, (e.g. houses, commercial buildings and accompanying roads and land uses) as opposed to development such as renewable energy schemes (e.g. wind turbines, biomass crops).

Figure 3: Landscape Sensitivity and Capacity

- Landscape sensitivity - ability of the landscape to accommodate particular types of change or development, including landscape character sensitivity and visual sensitivity
- Landscape capacity - a subjective assessment of how much development could be accommodated in the landscape. This is based on landscape sensitivity but includes a judgement of landscape value including ecological and heritage designations

From Landscape Character Assessment Guidance for England and Scotland - Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity (The Countryside Agency & Scottish Natural Heritage, 2002)

- 4.6 It should be noted that an assessment of landscape sensitivity and capacity is a piece of technical work in its own right. The landscape sensitivity and capacity work undertaken as part of the MAPS study is intended to be a supplement to, and not replacement for detailed landscape sensitivity and capacity work. Indeed, it is an initial assessment undertaken in the context of the wider MAPS study and seeks to contribute to the understanding of the settlement in its landscape context. Importantly, this work will assess landscape locations as opposed to specific sites.
- 4.7 Providing that a standard methodology is used, such work is considered robust and offers a more than adequate framework for assessing sensitivity and making clear judgements about capacity. For clarity, Figure 4 (below) sets out the definitions of the criteria used in the Landscape Survey pro-forma in Appendix A. Although the survey form may appear complex, it is a checklist that simply sets out the criteria that need to be considered.
- 4.8 The assessment of landscape capacity is based on a judgement of sensitivity and value. There are five categories of capacity:
- No Capacity: Landscapes of such high sensitivity that development is likely to be precluded
 - Low Capacity: Landscapes unlikely to absorb development without unacceptable adverse effects

Continued on page 14

¹² Landscape Character Assessment Guidance for England and Scotland - Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity (The Countryside Agency & Scottish Natural Heritage, 2002)

Figure 4: Landscape Survey Criteria

Sensitivity Criteria

- **Land Cover** - Combination of land use and vegetation. Pasture is considered to have the greatest ecological value than arable, due to the intense farming methods used and application of chemicals. The ecological value of woodland can vary from a coniferous plantation (low) to deciduous ancient woodland.
- **Enclosure** - Sense of enclosure of the landscape including scale and boundary treatment. Small scale landscapes tend to be more historic and managed without machinery.
- **Continuity** - The 'age' and level of disturbance of the landscape. Ancient or unsettled landscapes are less likely to be disturbed and are more susceptible and sensitive to change.
- **Pattern** - A unified landscape is less likely to have been modified over time than a variable or mixed landscape that has undergone a number of changes in land use or boundary treatment.
- **Land Form** - Essentially the topography or shape of the landscape. Sloping sites or sites on a ridge are more sensitive to change.
- **Tree Cover** - Landscapes with trees may be more sensitive to change, although trees can form effective boundaries that screen development making such sites less sensitive to development.
- **Views** - The visibility of the landscape to people including from dwellings, roads, railways, footpaths and public spaces. Takes into account short and long views, in and out of the landscape. Views can vary seasonally and is dependent on how the landscape is used and accessed.

Sensitivity Notes

- **Prominence** - Related to views, land cover and land form, prominence is concerned with the visibility of the site in the landscape. A site could be prominent, even if there are limited views, or vice-versa.
- **Land use** - The current use of the land including any amenity uses such as allotments, playing fields etc
- **Settlement** - The pattern and type of any neighbouring settlement and populations
- **Boundary** - Description of the treatment of the settlement boundary including its completeness
- **Access** - The degree of public access to the landscape
- **Mitigation** - Measures to reduce, remedy or compensate for any adverse landscape and visual effects

Sensitivity Scoring

- The sum of the multiplication of the sensitivity criteria against the sensitivity score resulting in a total sensitivity score out of 21: 7-11 = low, 12-16 = moderate, 17-21 = high. The higher the score, the more vulnerable the landscape is to change.

Value Criteria

- **Ecology** - The presence of any ecological designations e.g. Wildlife Sites and Sites of Special Scientific Interest.
- **Heritage** - The presence of any heritage designations e.g. Scheduled Monuments and Areas of Archaeological Significance.
- **Tranquillity** - A subjective assessment of the experience of being in the landscape including noise. Tranquillity is also related to enclosure: for example, a small-scale intimate landscape can still be tranquil despite the presence of background noise.

Value Scoring

- The sum of the multiplication of the value criteria against the value score resulting in a total value score out of 9: 3-4 = low, 5-7 = moderate, 8-9 = high.

Landscape Capacity Scoring (see matrix)

- The degree to which a landscape is able to accommodate change without unacceptable adverse effects on its character. NB: capacity will vary depending according to the nature and type of development.

Sensitivity	High	Mod	Low	No
	Mod	High	Mod	Low
	Low	Very High	High	Mod
Capacity		Low	Mod	High
		Value		

Definitions based on: 'Landscape Sensitivity and Capacity Study Report' (North Hertfordshire District Council, Nov 2006) and Guidelines for Landscape and Visual Impact Assessment (The Landscape Institute & IEMA, 2002, Spon Press, 2nd Ed)

- Moderate Capacity: Landscape may be able to accommodate development of an appropriate type and scale although proposals must include sufficient mitigation to ensure that any net adverse landscape impacts are balanced by potential gain
- High Capacity: Taking into account potential mitigation, the appropriate scale and design of development could be accommodated without compromising unacceptably the value or character of the landscape
- Very High Capacity: Taking into account potential mitigation there are likely to be no net unacceptable adverse impacts on the landscape character and value and may even be potential to improve landscape value

Townscape

4.9 Following an appreciation of the settlement in its landscape setting, the existing townscape or built-form needs to be understood. The following information will be collated and mapped:

- *Settlement evolution* - how the settlement has grown and developed over time highlighting key phases of development in the history of the settlement
- *Existing land use* - land use information from Hertfordshire County Council grouped into the following five broad categories: residential, commercial, community, recreation, and transport and utilities
- *Heritage assets* - including listed buildings, conservation areas, scheduled monuments, tree preservation orders (TPO), historic parks and gardens, and areas of archaeological significance (AAS)
- *Landmark buildings* - locally important buildings and structures within the town or the wider townscape due to their architectural style and/or presence. Such buildings can make either a positive or a negative contribution to the townscape; the latter providing an opportunity!
- *Accessibility to key services* - accessibility information provided by Hertfordshire County Council based on access to five key services (primary schools, secondary schools, hospitals, GP surgeries, retail areas, employment areas) using passenger transport
- *Connectivity* - identifying the key functions of areas and how they are connected and related to other areas of the town; and how these may be improved
- *Network of routes* - showing the network of routes and connections including roads and public footpaths and key transport nodes where key routes and transport services intersect; and how these may be used to access and integrate new developments
- *Built-form mapping* - the framework of blocks and plots that make up the settlement (e.g. Figure-Ground diagrams) and how these vary across the settlement and can influence new patterns of development

- 4.10 Fieldwork will be undertaken to survey the built environment or townscape of each settlement. This will entail undertaking townscape characterisation work to identify different character areas or zones within each settlement.
- 4.11 In undertaking the Townscape Survey an Outline Assessment approach will be followed, as advocated by English Heritage¹³. Outline Assessments are the ideal approach where large geographical areas need to be assessed (see Figure 5). The outline approach will also be used because this study will look at the whole town and not just focus on its historic cores or conservation areas.

Figure 5: Outline Assessment

An Outline Assessment will:

- Set out the general character of an area, or of sub-area within it, drawing attention to representative building types and landscapes, and the main periods of development;
- Identify any neighbourhoods, buildings, landscapes or other periods of particular historic interest or significance;
- And identify which areas, if any, merit more detailed assessment, and which have been adequately served by the Outline Assessment.

From Understanding Place - Historic Area Assessments: Principles and Practice (English Heritage, 2010)

- 4.12 Indeed, this study will not supplant work undertaken as part of the conservation area appraisals; although there are obvious synergies. Co-ordination, where appropriate, will help avoid unnecessary duplication although it should be stressed that the purpose of townscape characterisations (and therefore the level of detail) is different from detailed conservation area characterisation that focuses much more on the history of the area and on specific historic buildings. Nevertheless, it is anticipated that the outputs of this study will sit alongside conservation area character statements to inform development proposals.
- 4.13 A visual survey will be undertaken and information will be recorded on a standard Assessment Pro-forma (attached at Appendix B). The use of a standard Pro-forma ensures that the information will be recorded consistently. The survey will be based on the Aspects of Development Form as set out in 'By Design'¹⁴ which identifies the different components of the built environment. The components are summarised as follows and explained in greater detail in Figure 6 (below):
- Layout: urban structure and grain (including framework of routes and arrangement of plots)
 - Landscape (including character and appearance of land)
 - Mix (including range of uses)
 - Scale: density, height and massing (including impact of views and vistas and the three dimensional expression of buildings)
 - Appearance: details and materials (including building techniques and decoration, texture, colour and pattern)

¹³ 'Understanding Place - Historic Area Assessments: Principles and Practice' (English Heritage, 2010)

¹⁴ Page 16, By Design - Urban Design in the Planning System: Towards Better Practice (DETR/CABE, 2000)

4.14 The survey form will also be used to identify urban design opportunities. The following information will be collated:

- Location, name and address
- Description e.g. current use, types of buildings etc
- Relationship to surroundings especially in terms of connectivity
- Justification of why the particular urban design opportunity exists
- Opportunities setting out how redevelopment could improve the character and vitality of the area

Figure 6: Aspects of Built Form

Layout: urban structure and urban grain

Urban structure is the framework of routes and spaces that connect locally and more widely, and the way developments, routes and open spaces relate to one other. The layout provides the basic plan on which all other aspects of the form and uses of a development depend. The pattern of the arrangement of street blocks, plots and their buildings in a settlement. The degree to which an area's pattern of blocks and plot subdivisions is respectively small and frequent (fine grain), or large and infrequent (coarse grain).

Mix

The range of uses in an area such as residential, retail, industrial or open space. It is also about how an area is used by people.

Scale: density, height and massing

Scale is the size of a building in relation to its surroundings, or the size of parts of a building or its details, particularly in relation to the size of a person. Density is the amount of development on a given piece of land. Density influences the intensity of development, and in combination with the mix of uses can affect a place's vitality and viability. The density of a development can be expressed in a number of ways. This could be in terms of plot ratio (particularly for commercial developments), number of dwellings, or the number of habitable rooms (for residential developments). Height determines the impact of development on views, vistas and skylines. Height can be expressed in terms of the number of floors; height of parapet or ridge; overall height; any of these in combination; a ratio of building height to street or space width; height relative to particular landmarks or background buildings; or strategic views. Massing is the combined effect of the arrangement, volume and shape of a building or group of buildings in relation to other buildings and spaces. Massing is the three-dimensional expression of the amount of development on a given piece of land.

Appearance: details and materials

The craftsmanship, building techniques, decoration, styles and lighting of a building or structure. This includes all building elements such as openings and bays; entrances and colonnades; balconies and roofscape; and the rhythm of the façade. Materials include the texture, colour, pattern and durability of materials, and how they are used.

The richness of a building lies in its use of materials which contribute to the attractiveness of its appearance and the character of an area.

Landscape

The character and appearance of land, including its shape, form, ecology, natural features, colours and elements, and the way these components combine. This includes all open space, including its planting, boundaries and treatment.

From Definitions from 'By Design - Urban Design in the Planning System: Towards Better Practice' (page 16, DETR/CABE, 2000) and quoted verbatim except for density that has been included in scale, and mix; the definition of which has been elucidated upon.

5.0 Stage 2 - Place Shaping

- 5.1 Utilising the morphology information from Stage 1, Stage 2 will apply it to the settlements to give an analysis of how the settlement can positively evolve and accommodate future development (i.e. place shaping). There are two aspects to Stage 2 - Place Shaping.
- 5.2 The first relates to the existing built-up area and seeks to broadly characterise the settlement into its component parts, providing guidance on how the existing town could accommodate development, including suggesting urban design opportunities.
- 5.3 The second aspect provides guidance in respect of how development could be accommodated on the periphery of the settlement. It is considered that this aspect of the MAPS study will be the most sensitive in that it will entail the Council producing information in respect of the design of peripheral greenfield and Green Belt locations. It will be essential, therefore, to be clear about both the objectives and limitations of the study.
- 5.4 Indeed, the MAPS study will be crucial in protecting peripheral greenfield and Green Belt locations because it seeks to provide design information as to how development can be accommodated positively in and around the town. Importantly, the MAPS study will not determine whether a location should come forward for development. Instead, subject to the amount of the development required in each settlement, the MAPS study will provide guidance on which locations should come forward for development from a design perspective. Thus, it seeks to ensure that any developed is well integrated and enhances the character of the existing settlement.

Urban Place Shaping

- 5.5 Using the survey information, a number of character areas or townscape zones will be identified. The purpose of identifying these zones is two-fold. Firstly, they help to understand how the town has evolved, in order to appreciate the present situation and context. Secondly, by understanding the context, they form part of the place shaping agenda to identify areas of opportunity setting out what each area of the town will be like in the future.
- 5.6 This will include identifying any key locations that, from an urban design perspective, would benefit from redevelopment, for example, locations that are not considered to make a positive contribution to the area in urban design or townscape terms. Any regeneration or redevelopment must be to enhance the vitality of the area. The purpose of this work is not to undertake a thorough analysis of every possible site within the settlement (that is the function of the Housing Capacity Assessment¹⁵). Furthermore, it should be stressed that the identification of such locations is not an indication of either their suitability for redevelopment in planning or planning policy terms or an indication that the landowner is seeking redevelopment.
- 5.7 Whilst it is acknowledged that every town is unique in its appearance and character, when looking at the settlement as a whole there are common features shared by the towns in East Herts, reflecting the way that our market towns have evolved over the centuries. Reflecting the principles of settlement morphology, the townscape zones will not simply be

¹⁵ East Herts Housing Capacity Assessment (Entec, 2007) available to view at www.eastherts.gov.uk/technicalstudies

defined by appearance and building form. Rather, the following five standard zones have been identified and these will be applied to areas within each settlement based on the areas' particular function and character:

- **Peripheral Commercial Zone**
- **Living / Suburban Zone**
- **Access Corridor Zone**
- **Core Commercial Zone**
- **Edge of Centre Zone**

5.8 These zones have been created for the purposes of this study, although they are considered robust to apply to other areas. It is however acknowledged that non-market towns (e.g. cities, urban areas, New Towns) will have a different evolution and history and the identification of different zones may be applicable. The key and standard components of the zones are set out below:

- *Peripheral Commercial Zone* - Commercial areas on the periphery of the settlement, often forming gateways to the town. Likely to have large-scale plots for retail, industrial, office, and utility use that cannot be accommodated within the centre of the town. Noticeably different from the peripheral suburban areas since they include trip generators e.g. supermarkets and retail warehouses, depots etc.
- *Living / Suburban Zone* - The main residential areas of the town, built to house the increasing population and dating mostly from the 19th Century to the present day. Such areas may encompass a variety of housing styles and tenures but are predominately in single residential use, whether on the periphery of the town or in more inner locations.
- *Access Corridor Zone* - Main linear access routes that penetrate the town. Corridors of mixed uses that connect the main residential areas of the town (e.g. Living / Suburban Zone) with the town's commercial activities (e.g. Core Commercial Zone). Even where residential uses predominate in the Access Zone, they have a distinctly different and more vibrant feel than the more suburban areas (e.g. Living / Suburban Zone).
- *Core Commercial Zone* - The town centre and commercial and historic core of the town. A mix of commercial uses including offices, although predominately retail focused. Reflecting the market town character, in East Herts this zone may be quite small with limited opportunities for development in the future.
- *Edge of Centre Zone* - A transition zone between the commercial core and the suburban residential areas. A mixed area, which, in terms of residential uses, includes historic residential plots as well as recent flatted redevelopments on former industrial sites. Ancillary commercial and utility uses to the town centre may also be present such as supermarkets and passenger transport interchanges.

5.9 Notwithstanding the above, it is acknowledged that identifying boundaries on a map is always a contentious issue and it is important that a robust approach using the Survey Pro-

forma is adopted (see Appendix B). Furthermore, it should be clear as to why one particular street falls within one particular area and not another.

- 5.10 The PLACE zones will be identified from the built environment survey and validated against the desk-top information to ensure that areas are not considered in isolation but within the wider context. The identification of separate zones will build on work already undertaken as part of the Core Strategy Issues and Options consultation as well as previous work including the Hertford Conservation Area Character Statement and the Bishop's Stortford Town Study that identified environmental zones in parts of the town.
- 5.11 A series of PLACE Zone summaries will provide more detailed descriptions of the specific characteristics of these areas within each settlement. However, these summary descriptions of the zones will not be a detailed account nor will they be prescriptive in terms of built-form and design. Such information would not be appropriate for inclusion in the Core Strategy and should be included in a detailed design Supplementary Planning Document (SPD). Instead the summaries should seek to capture the flavour and atmosphere of the area to inform the principles of design and development in each identified settlement. These summaries will also help inform the design and integration of new areas for development.

Peripheral Place Shaping

- 5.12 Using the information collated in Stage 1 - Morphology, the MAPS study then looks at how development could be accommodated on the periphery of the settlement. This will entail an appreciation of both the landscape setting and the relationship of the location to the adjacent existing built-up area.
- 5.13 The purpose of undertaking this technical work is to identify in settlement-wide design terms those locations that are and are not suitable for peripheral development. It should be noted, that the MAPS study is based on the assumption that greenfield land will be required to meet some of East Herts development requirements to 2031.
- 5.14 Many peripheral locations will also be designated as Green Belt. As explained in Section 3.0, Green Belt is a policy designation and it is envisaged that a separate Green Belt study will be undertaken to determine from a Green Belt perspective which areas, if any, should be released from the Green Belt.
- 5.15 It should be stressed however, that the identification of an area within the MAPS study is not an indication of its suitability for development in planning or planning policy terms or an indication that the landowner is seeking to bring it forward for development. Indeed, whether an area comes forward for development is a policy decision to be made through public consultation and the preparation of the LDF. The MAPS study simply informs that process by providing technical evidence as to which locations (if any) are most suitable from a settlement-wide design perspective.
- 5.16 Using the morphology information from Stage 1, locations will be assessed in broad design terms. The purpose of this work is not to provide detailed designs for actual sites but rather, provide information as to whether locations are suitable for development in principle. A series of design principles for accommodating peripheral development will also be established.

6.0 Conclusion

- 6.1 The ultimate aim of the MAPS study is to provide a sound analysis in respect of settlement design as part of the evidence base of the East Herts LDF, so as to inform planning decisions about how each town should evolve to 2031. Such information will assist landowners and developers, the community, and planning officers and councillors, as to how a site can contribute to the wider design of the town and help deliver the vision for that town. Specifically, it will inform the visioning and broad locations of the Core Strategy, the SLAA technical work and the Site Allocations DPD.
- 6.2 As set out in Section 3.0, the main output will be a MAPS Report for each identified settlement. In addition to fieldwork and survey information, each report will also make recommendations, presented as follows:
- A plan that identifies the townscape character zones and the locations where development could be accommodated from a settlement-wide design perspective
 - Summaries of each townscape character zone that describe the key features of each zone and any areas of opportunity
 - Design-led principles for accommodating development including peripheral development and setting out how connectivity could be improved
- 6.3 Importantly, it should be stressed that the MAPS study itself does not constitute planning policy nor necessarily represent the intentions of East Herts Council. Once completed, the MAPS Reports will form part of the evidence base for the East Herts LDF and will simply inform decisions in respect of settlement-wide design and shaping the future of East Herts to 2031. Decisions about which locations should be developed will be made through public consultation and the preparation of the LDF.

Appendix A: Landscape Standard Assessment Pro-forma

Landscape Survey Pro-forma

LCA Area:

Evaluation:

Key Characteristics:

Settlement:

Area:

OS Grid Ref:

Size:

Sensitivity	Low	Mod	High	Notes			
	1	2	3				
Land Cover	Arable	Wooded	Pasture				
Enclosure	Open	Moderate	Very				
Continuity	Planned	Pastoral	Unsettled				
Pattern	Varied	V / U	Uniform				
Land Form	Flat	Undulating	Sloping				
Tree Cover	Large	Small	Open				
Views	Few	Moderate	Many				
Short In				Land Use			
Short Out				Settlement			
Long In				Boundary			
Long Out				Access			
Prominence				Mitigation			
Total					L: 7-11	M: 12-16	H: 17-21

Value	Low	Mod	High	Notes			
	1	2	3				
Ecology	National	Local	None				
Heritage	National	Local	None				
Tranquillity	Very	Moderate	Un-tranquil				
Total					L: 3-4	M: 5-7	H: 8-9

Sensitivity	High	Mod	Low	No
	Mod	High	Mod	Low
	Low	Very High	High	Mod
Capacity		Low	Mod	High
		Value		

Photos:

Assessor:

Date:

Appendix B: Townscape Standard Assessment Pro-forma



Townscape Survey Pro-forma

Policy Designations:	Settlement: Street/Area:
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Layout:	Mix:
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Scale:	Appearance:
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Landscape:	Other observations:
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Location	Description	Relationship	Justification	Opportunities

MAPS Zones	
Peripheral Commercial	
Living / Suburban	
Access Corridor	
Core Commercial	
Edge of Centre	

Photos:

Assessor:
Date:

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