



MEETING : DISTRICT PLANNING EXECUTIVE PANEL
VENUE : COUNCIL CHAMBER, WALLFIELDS, HERTFORD
DATE : THURSDAY 13 OCTOBER 2016
TIME : 7.00 PM

MEMBERS OF THE PANEL

Councillors L Haysey (Chairman), E Buckmaster and G Jones

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

Members are requested to retain their copy of the agenda and bring it to the relevant Executive and Council meetings.

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1. A Member, present at a meeting of the Authority, or any committee, sub-committee, joint committee or joint sub-committee of the Authority, with a Disclosable Pecuniary Interest (DPI) in any matter to be considered or being considered at a meeting:
 - must not participate in any discussion of the matter at the meeting;
 - must not participate in any vote taken on the matter at the meeting;
 - must disclose the interest to the meeting, whether registered or not, subject to the provisions of section 32 of the Localism Act 2011;
 - if the interest is not registered and is not the subject of a pending notification, must notify the Monitoring Officer of the interest within 28 days;
 - must leave the room while any discussion or voting takes place.
2. A DPI is an interest of a Member or their partner (which means spouse or civil partner, a person with whom they are living as husband or wife, or a person with whom they are living as if they were civil partners) within the descriptions as defined in the Localism Act 2011.
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 - participate in any discussion or vote on a matter in which a Member has a DPI;
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AGENDA

1. Apologies

To receive apologies for absence.

2. Chairman's Announcements

3. Minutes (Pages 5 - 16)

To approve as a correct record the Minutes of the meeting of the Panel held on 15 September 2016.

4. Declarations of Interests

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

5. Sustainability Appraisal of the Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area, September 2016 (Pages 17 - 64)

6. East Herts District Plan – Interim Duty To Co-operate Compliance Statement (Pages 65 - 172)

7. East Herts District Plan – Interim Consultation Statement (Pages 173 - 214)

8. Air Quality Planning Guidance, October 2016 (Pages 215 - 220)

Note – Essential Reference Paper 'B' to follow.

9. 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.

MINUTES OF A MEETING OF THE
DISTRICT PLANNING EXECUTIVE PANEL
HELD IN THE COUNCIL CHAMBER,
WALLFIELDS, HERTFORD ON THURSDAY
15 SEPTEMBER 2016, AT 7.00 PM

PRESENT: Councillor L Haysey (Chairman)
Councillors E Buckmaster and G Jones.

ALSO PRESENT:

Councillors A Alder, M Allen, D Andrews,
P Ballam, R Brunton, K Crofton,
I Devonshire, M Freeman, Mrs D Hollebon,
J Jones, M McMullen, P Moore, T Page,
M Pope, S Reed, S Rutland-Barsby,
R Standley, M Stevenson, N Symonds and
J Wyllie.

OFFICERS IN ATTENDANCE:

Lorraine Blackburn	- Democratic Services Officer
Chris Butcher	- Principal Planning Officer
James Mead	- Assistant Planning Officer
Kay Mead	- Principal Planning Officer
Laura Pattison	- Senior Planning Officer
George Pavey	- Planning Officer
Jenny Pierce	- Principal Planning Officer
Claire Sime	- Planning Policy Manager

- | | |
|---------------|---|
| Kevin Steptoe | - Head of
Planning and
Building Control
Services |
| Liz Watts | - Chief Executive |

51 **EAST HERTS DRAFT DISTRICT PLAN – BISHOP’S
STORTFORD – SETTLEMENT APPRAISAL AND NEW
DRAFT CHAPTER 5**

The Panel considered a report on a Settlement Appraisal for Bishop’s Stortford, together with a draft revised chapter, for subsequent incorporation into the Pre-Submission District Plan.

Councillor T Page sought and was provided with clarification on housing targets for Uttlesford District and East Herts Councils and how these were determined.

Councillor Mrs D Hollebon expressed her concern at developments proposed for Bishop’s Stortford South. The Chairman acknowledged her concerns and stated that further work would be required over the coming months in order to address more detailed issues. Her concerns were echoed by Councillor J Wyllie. Councillor N Symonds stated that one primary school in the District was teaching children in the corridor.

Councillor G Jones raised a number of concerns about development in Bishop’s Stortford based on the inadequacy of a supporting infrastructure, including education, health and transport. He also referred to limited sports provision. Officers responded to the points raised.

Councillor G Jones asked that his opposition to this Chapter of the District Plan (on the grounds of sufficient supporting infrastructure) be formally recorded.

The Panel supported the recommendations as now

detailed.

RECOMMENDED – that (A) the Bishop’s Stortford Settlement Appraisal as detailed at Essential Reference Paper ‘B’ to the report submitted, be agreed; and

(B) the draft revised Chapter 5 (Bishop’s Stortford), as detailed in Essential Reference Paper ‘C’ to the report submitted, be agreed as a basis for inclusion in the Pre-Submission District Plan.

52 **EAST HERTS DRAFT DISTRICT PLAN – CHAPTER 10 – VILLAGES: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION**

The Panel considered a report bringing Members’ attention to the issues raised through the Preferred Options consultation in connection with Chapter 10 (Villages) of the Draft District Plan preferred Options version together with Officer responses.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Chapter 10 (Villages) of the Draft District Plan Preferred Options, as detailed at Essential Reference Paper ‘B’ to the report submitted, be received and considered; and

(B) the Officers’ response to the issues referred to in (A) above, as detailed in Essential Reference Paper ‘B’ to the report submitted, be agreed.

53 **EAST HERTS DRAFT DISTRICT PLAN – VILLAGES APPRAISAL AND NEW DRAFT CHAPTER 10**

The Panel gave consideration to a report on a Settlement Appraisal for the Villages together with a draft revised chapter, for subsequent incorporation into the Pre-

Submission District Plan.

Councillor I Devonshire queried criterion VI of Policy VILL1. Officers agreed to split the criterion to ensure clarity.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the Villages Appraisal as detailed at Essential Reference Paper “B” to the report submitted be agreed; and

(B) the draft revised Chapter 10 (Villages) as detailed in Essential Reference Paper ‘C’ to this report, be agreed as a basis for inclusion in the Pre-Submission District Plan.

54 **EAST HERTS DRAFT DISTRICT PLAN – APPENDICES:
RESPONSE TO ISSUES RAISED DURING PREFERRED
OPTIONS CONSULTATION AND UPDATED APPENDIX C:
MONITORING FRAMEWORK AND APPENDIX D:
GLOSSARY**

The Panel considered a report bringing Members’ attention to the issues raised through the Preferred Options consultation in connection with the Appendices to the Draft District Plan Preferred Options version, together with Officer responses to those issues. Members were also presented with a revised Appendix C: Monitoring Framework and Appendix D: Glossary. The report sought agreement to include these appendices within the East Herts District Plan Pre-Submission Version, 2016.

The Officer explained that Appendix C: Open Space Standards’ was proposed for deletion. As a result, the Monitoring Framework, formerly labelled as Appendix D, would be renamed as ‘Appendix C: Monitoring Framework’. This updated position in respect of these appendices reflected both the Officer proposed

responses to representations made to the Preferred Options Consultation in 2014 and also to ensure alignment with the Pre-Submission Plan.

In respect of Appendix D 'Glossary', (previously Appendix E), the Officer explained that while no representations were made at the Preferred Options stage, this had been rewritten to reflect numerous changes in local and wider circumstances and was attached at Essential Reference Paper 'D' to the report, (and not Essential Reference Paper 'C' as detailed in paragraph 2.4 of the report). Two further amendments were proposed within Essential Reference Paper 'D', which would be addressed within the following report on the agenda papers.

Councillor G Jones sought and was provided with clarification in relation to the Council's Parking Standards and where these would be included within the District Plan i.e. that standards would not be included within the Plan itself, but that a revised Vehicle Parking at New Development Supplementary Planning Document would be produced to bring forward updated standards at the earliest opportunity post adoption of the Plan.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the issues raised in respect of Appendices to the Draft District Plan Preferred Options, as detailed at Essential Reference Paper 'B' to the report submitted, be received and considered;

(B) the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Paper 'B' to the report submitted, be agreed;

(C) the revised version of 'Appendix C: Monitoring Framework' to the East Herts District Plan Pre-Submission Version, 2016, as detailed at Essential Reference Paper 'C' to the report submitted, be

agreed for inclusion in the Pre-Submission East Herts District Plan, 2016; and

(D) the revised version of 'Appendix D: Glossary' to the East Herts District Plan Pre-Submission Version, 2016, as detailed at Essential Reference Paper 'D' to the report submitted, be agreed for inclusion in the Pre-Submission East Herts District Plan, 2016.

55 **EAST HERTS DISTRICT PLAN - PROPOSED AMENDMENTS TO FINAL TEXT OF THE EAST HERTS DISTRICT PLAN PRE-SUBMISSION VERSION, 2016**

The Panel gave consideration to a report which presented Members with a schedule of proposed amendments to address issues which had arisen since consideration of related chapters at previous District Planning Executive Panel meetings, and sought agreement to include these within the East Herts District Plan Pre-Submission Version, 2016.

The Officer referred to the need to include an addendum to Essential Reference Paper 'B'.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that the amendments to the East Herts District Plan Pre-Submission Version, 2016, as detailed at Essential Reference 'B' to the report submitted, and the addendum, be agreed.

56 **DRAFT HARLOW STRATEGIC SITES ASSESSMENT, SEPTEMBER 2016**

The Panel considered the Draft Harlow Strategic Sites Assessment, September 2016.

Councillor T Page queried whether all housing in the Gilston area would contribute towards East Herts housing

needs, rather than those of Harlow. The Chairman confirmed that they would.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the Draft Harlow Strategic Sites Assessment, September 2016, as detailed at Essential Reference ‘B’ to the report submitted, be supported as part of the evidence base to inform and support the East Herts District Plan; and

(B) the Head of Planning and Building Control, in consultation with the Leader of the Council, be authorised to agree the final version of the document.

57 **STRATEGIC FLOOD RISK ASSESSMENT, AUGUST 2016**

The Panel considered a report detailed the Strategic Flood Risk Assessment August 2016.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the Strategic Flood Risk Assessment, August 2016, be supported as part of the evidence base to inform and support the East Herts District Plan; and

(B) the Head of Planning and Building Control, in consultation with the Leader of the Council, be authorised to agree an updated version of the document following completion of the climate change mapping.

58 **SUSTAINABILITY APPRAISAL (SA) OF THE EAST HERTS DISTRICT PLAN - PRE-SUBMISSION VERSION 2016**

The Panel considered a report presenting Members with a

Sustainability Appraisal (SA) of the East Herts District Plan Pre-Submission Version 2016 and to seek agreement to publish the SA for consultation under Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012 as amended.

Councillor G Jones referred to the Appraisal Findings within the supplementary document circulated separately and expressed concern regarding Air Quality and the “residual minor negative effect” on air quality. He referred to the report’s findings on transport and its “negative effects” and the lack of mitigating actions to address this. The Officer addressed his points of concern.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that the Sustainability Appraisal of the East Herts District Plan Pre-Submission Version 2016, as detailed at Essential Reference ‘B’ to the report submitted, be agreed and published for consultation for a period of six-weeks in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended.

59 HABITAT REGULATIONS ASSESSMENT (HRA) OF THE EAST HERTS DISTRICT PLAN - PRE-SUBMISSION VERSION 2016

The Panel gave consideration to the Habitat Regulations Assessment (HRA) of the East Herts District Plan Pre-Submission Version 2016.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that the Habitats Regulations Assessment, as detailed at Essential Reference ‘B’ and Essential Reference Paper ‘C’ to the report

submitted, be supported as part of the evidence base to inform and support the East Herts District Plan.

60 **INFRASTRUCTURE DELIVERY PLAN (IDP) VERSION 1,
SEPTEMBER 2016**

The Panel gave consideration to the Infrastructure Delivery Plan (IDP) Version 1, September 2016.

Councillor J Jones sought and was provided with clarification in relation to the infrastructure requirement for Buntingford, specifically on the issue of transport and education.

Councillor Mrs D Hollebon sought and was provided with clarification on priority junction improvements on Obrey Way in Bishop's Stortford and referred to the severe congestion at Whittington Way. The Officer undertook to write to the Member with further information.

The Chairman reminded Members that transport issues would need to be addressed through more detailed design work in consultation with Hertfordshire County Council and other consultees. She stated she was cognisant of the Member's concerns.

Councillor J Wyllie referred to the "critical" need for primary and secondary education provision as part of the proposed Bishop's Stortford South development, and his concerns that current flight paths and the expansion of Stansted Airport could have health, noise and air pollution implications to children. He reiterated his concerns about development in this location.

Councillor G Jones questioned the level of priority given to certain infrastructure schemes within the document. The Head of Planning and Building Control explained that this was Version 1 of a 'live' document which would be refined prior to submission of the District Plan in March 2017.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that the Infrastructure Delivery Plan (IDP), Version 1, September 2016, as detailed at Essential Reference 'B' to the report submitted, be supported as part of the evidence base to inform and support the East Herts District Plan.

61 **EAST HERTS DISTRICT PLAN – PRE-SUBMISSION
VERSION 2016**

The Panel considered the consolidated East Herts District Plan Pre-Submission Version 2016 and sought agreement to publish the Plan for Consultation under Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012 as amended. The Officer explained that the Pre-Submission District Plan set out the vision, policies and proposals to guide future development and the use of land within East Herts over the Plan-period to 2033.

The Chairman referred to the lengthy and complicated process in developing the plan and thanked all Officers for their role in developing the Pre-Submission District Plan. She asked all Members to ensure that Towns and Parishes reviewed the Plan as a whole, as the information within it, provided certainty as to where development was most likely to take place and would guide decision-makers on the most appropriate forms of development.

Members complimented Officers on the preparation of the Plan.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the East Herts District Plan Pre-Submission Version 2016, as detailed at Essential Reference 'B' to the report submitted, be

agreed and published for consultation for a period of six-weeks in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended;

(B) the Head of Planning and Building Control, in consultation with the Leader of the Council, be authorised to make non-material typographical, formatting, mapping and other amendments to the Plan, prior to its publication for consultation in November 2016; and

(C) the 'Frequently Asked Questions' paper, as detailed at Essential Reference Paper 'C' to the report submitted, be agreed and published alongside the Plan.

62 CHAIRMAN'S ANNOUNCEMENTS

The Chairman welcomed all to the meeting. The Chairman outlined what agenda papers had been forwarded to Members.

The Chairman reminded Members that the Pre-Submission consultation on the District Plan would take place between 3rd November and 15th December. All responses submitted during that time would be collated and sent to the Inspector in March 2017 for consideration as part of the examination process. She stated that there would be another District Plan Executive Panel on 13 October 2016.

63 MINUTES - 8 SEPTEMBER 2016

RESOLVED – that the Minutes of the meeting held on 8 September be approved as a correct record and signed by the Chairman.

The meeting closed at 8.28 pm

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 13 OCTOBER 2016

REPORT BY LEADER OF THE COUNCIL

SUSTAINABILITY APPRAISAL OF THE STRATEGIC SPATIAL
OPTIONS FOR THE WEST ESSEX AND EAST HERTFORDSHIRE
HOUSING MARKET AREA, SEPTEMBER 2016

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members the Sustainability Appraisal (SA) of the Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the Sustainability Appraisal of the Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area as detailed at Essential Reference 'B' to the report submitted, be agreed as part of the evidence base to support the East Herts District Plan.

1.0 Background

1.1 Members will be aware that this Council has been working with Epping Forest, Harlow and Uttlesford District Councils through the Duty to Co-operate to identify the objectively assessed needs of the housing market area (HMA) and to explore options for meeting these needs across the HMA. Part of this work has involved undertaking a Sustainability Appraisal style assessment of the range of growth and locational options for delivering new housing.

1.2 A draft of this assessment was used to inform each authority's

formal Sustainability Appraisals and is now presented in this report in its final form. A copy of the assessment is included in **Essential Reference Paper 'B'**.

2.0 Report

2.1 In response to the need to fulfil Duty to Co-operate requirements and to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts, the West Essex and East Hertfordshire authorities have explored options for meeting the objectively assessed housing need across the Housing Market Area. To support this process, AECOM have worked with the four authorities to:

- identify options for spatially distributing the housing need identified in the SHMA (2015), the DCLG 2012-based household projections and the August 2016 advice from ORS;
- provide an evidenced-based sustainability appraisal style assessment setting out the anticipated significant positive and negative impacts of each option and potential mitigation measures (where relevant); and
- facilitate the development of mechanisms to agree how each authority will work together on Duty to Co-operate matters in the future.

2.2 These activities are collectively referred to as the Strategic Spatial Options Study. It is anticipated that the three elements of the Study will provide a critical piece of evidence to the Planning Inspectorate demonstrating that the key strategic issue of housing growth has been robustly addressed and that the Duty to Co-operate has been clearly complied with.

2.3 As the Sustainability Appraisal (SA) of the Strategic Spatial Options is not an appraisal of a 'Plan' per se, rather it appraises theoretical options, it was not undertaken in line with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. However, it has been undertaken in the spirit of the requirements and uses the same Sustainability Appraisal (SA) Framework as has been used for each local authority SA which comprises assessing each option against the following issues:

- Biodiversity
- Community and Wellbeing
- Economy and Employment
- Historic Environment
- Housing
- Land
- Landscape
- Low Carbon Development
- Transport
- Water

2.4 Part 3 of the assessment contains the assessment findings, considering the various alternative options against the SA framework. Part 4 of the assessment discusses the evidence base used to choose the preferred spatial option across the housing market area. Part 5 of the appraisal sets out the next steps of the sustainability appraisal process which have been incorporated into each authority's SA.

2.5 The assessment has informed the consideration of the possible cumulative impacts arising from growth across the housing market area. A key part of this assessment has been transport modelling which considers the impact arising from this growth on the wider transport network. This has improved understanding of the cross-boundary infrastructure required to mitigate the effects of this growth, which will form part of a Memorandum of Understanding with each relevant authority including Hertfordshire and Essex County Councils.

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

Sustainability Appraisal of the Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area, September 2016

Contact Member: Cllr Linda Haysey – Leader of the Council
linda.haysey@eastherts.gov.uk

Contact Officer: Kevin Steptoe – Head of Planning and Building
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Report Author: Jenny Pierce – Principal Planning Policy Officer
jenny.pierce@eastherts.gov.uk

ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	None
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Pre-Submission District Plan in general will have positive impacts on health and wellbeing through a range of policy approaches that seek to create sustainable communities.

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Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area



Sustainability Appraisal Report

September 2016



Uttlesford
District Council
Page 23

Quality information

Document name	Ref	Prepared for	Prepared by	Date	Reviewed by
Sustainability Appraisal Report for West Essex and East Hertfordshire Housing Market Area		East Hertfordshire District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council	Nick Chisholm-Batten	27 September 2016	Steve Smith

Revision history

Revision	Revision date	Details	Prepared by	Position
1	12 July 2016	1 st draft for client comment	Nick Chisholm-Batten	Principal Consultant
2	2 September 2016	2 nd draft for client comment	Nick Chisholm-Batten	Principal Consultant
3	22 September 2016	3 rd draft for client comment	Nick Chisholm-Batten	Principal Consultant
4	27 September 2016	Final version	Nick Chisholm-Batten	Principal Consultant

Limitations

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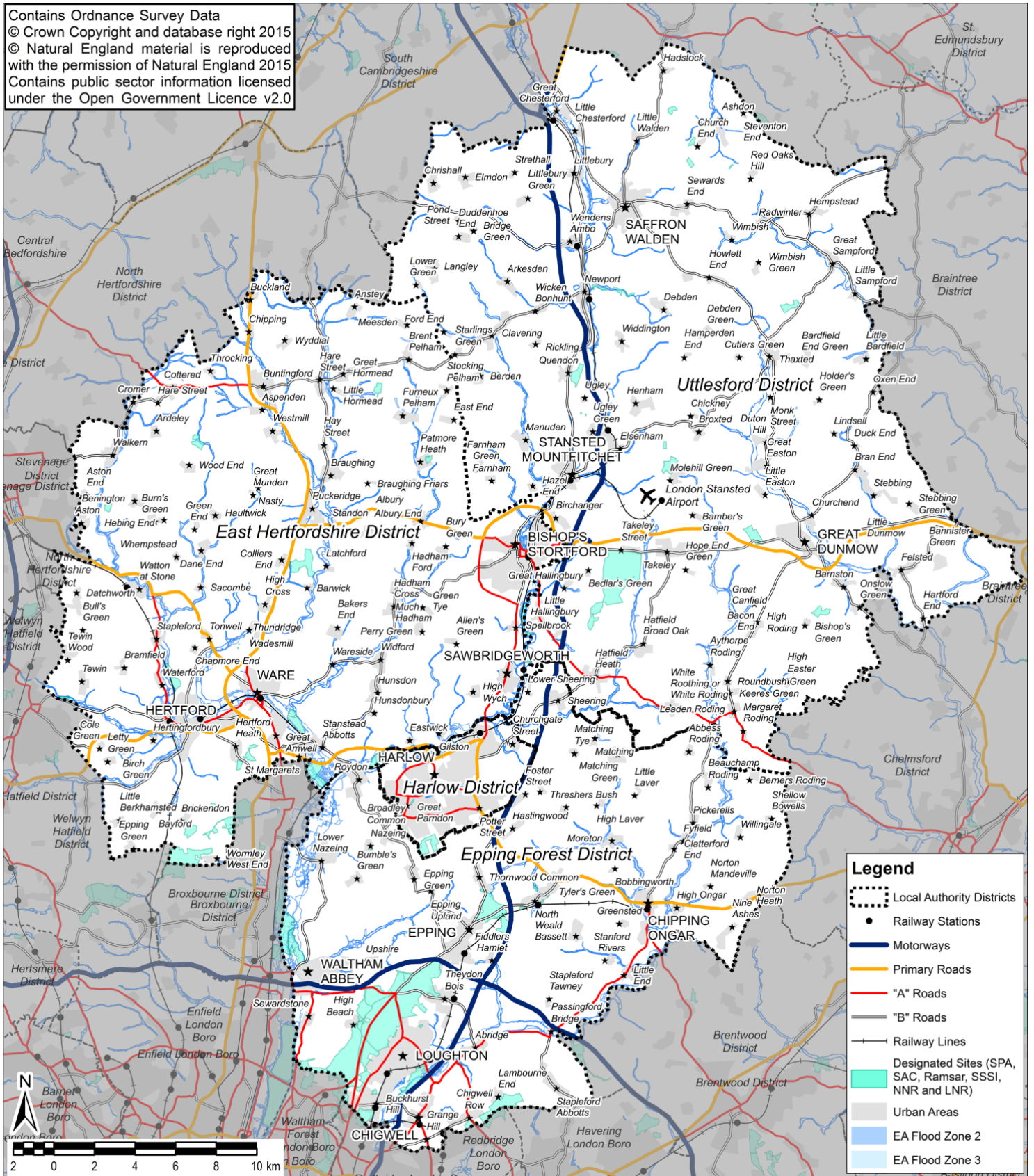
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Legend

- Local Authority Districts
- Railway Stations
- Motorways
- Primary Roads
- "A" Roads
- "B" Roads
- Railway Lines
- Designated Sites (SPA, SAC, Ramsar, SSSI, NNR and LNR)
- Urban Areas
- EA Flood Zone 2
- EA Flood Zone 3

Figure 1.1: West Essex and East Hertfordshire Housing Market Area

1 Introduction

1.1 Background: The West Essex and East Hertfordshire Housing Market Area Strategic Spatial Options Study

AECOM has been commissioned to undertake a Sustainability Appraisal process to support the consideration of housing growth and distribution options for the West Essex and East Hertfordshire Housing Market Area.

Strategic Housing Market Assessment

East Hertfordshire District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council have a substantial history of co-ordinated working on planning issues, including on assessing housing need and planning for future growth.

Growth in the area is also being promoted by the London Stansted Cambridge Corridor (LSCC) Growth Commission which aims to raise the global economic potential of the LSCC, setting out a vision for transformational change. The Commission's report, published in July 2016, argues that the LSCC has the hallmarks of a national asset: a fast-growing population, vibrant economy, and presence in globally traded economic activities.¹ The report emphasises that failure to invest in measures to boost housebuilding will lead to further rises in house prices and worsening affordability which, in turn, has major implications for employers and their ability to recruit and retain talent.

With respect to housing need, three joint Strategic Housing Market Assessments (SHMAs) have been undertaken for the West Essex and East Hertfordshire Housing Market Area (HMA) since 2010. These have sought to establish what is referred to as Objectively Assessed Housing Need (OAHN) for the HMA. The most recent SHMA was undertaken in 2015.² This identified the OAHN for the HMA to be 46,100 dwellings over the 22-year period between 2011 and 2033, equivalent to an average of 2,095 dwellings per year. This includes an Objectively Assessed Need for Affordable Housing of 13,600 dwellings over the same period, equivalent to an average of 618 per year.

For the four authority areas, the SHMA concluded that the OAHN over the 22-year period for each of the four areas was as follows:

- 16,400 dwellings in East Hertfordshire
- 11,300 dwellings in Epping Forest
- 5,900 dwellings in Harlow
- 12,500 dwellings in Uttlesford

In addition, the SHMA highlighted that the Department for Communities and Local Government's (DCLG) 2012-based household projections indicated an increase in households from 175,189 to 224,827 across the HMA over the 22-year period 2011-33. The SHMA stated that *"PPG [Planning Practice Guidance] identifies that the starting point for estimating housing need is the CLG 2012-based household projections. For the 22-year period 2011-33, these projections suggest an increase of 49,638 households across the West Essex and East Hertfordshire HMA: an average growth of 2,256 households each year, comprised of 779 in East Hertfordshire, 653 in Epping Forest, 326 in Harlow and 498 in Uttlesford."*

¹ London Stansted Cambridge Corridor Growth Commission (2016). Findings and Recommendations of the London Stansted Cambridge Corridor Growth Commission www.lsccgrowthcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf.

² Opinion Research Services (September 2015) West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=5344&p=0>.

In August 2016, Opinion Research Services (ORS) updated the overall housing need³ to take into account more recent information including the DCLG 2014-based household projections and suggested a revised OAHN for the HMA of 54,608 disaggregated as follows:

- 19,427 dwellings in East Hertfordshire
- 13,278 dwellings in Epping Forest
- 7,824 dwellings in Harlow
- 14,080 dwellings in Uttlesford

Joint Economic Report

Alongside the SHMA, the four authorities commissioned a study to consider the Objectively Assessed Economic Need of the Functional Economic Market Area (FEMA)⁴, which considers a wider area than that of the HMA.⁵ This was published in 2015 and gives an up-to-date assessment of jobs growth need in the FEMA for the period 2011-33.

The study identified a net jobs growth per year of 1,890 for the FEMA. For the four authority areas, this translated as the following ranges in jobs growth per year:

- 435 – 505 in East Hertfordshire
- 400 – 455 in Epping Forest
- 325 – 335 in Harlow
- 665 – 675 in Uttlesford

Strategic Spatial Options Study

In response to a need to fulfil Duty to Cooperate requirements, and to adhere to the spirit of the NPPF which requires that local authorities '*... demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*'⁶ the West Essex and East Hertfordshire authorities have explored options for meeting OAHN across the HMA. This includes the consideration of a range of growth and locational options for delivering new housing.

To support this process, AECOM worked with the four authorities to:

- identify options for spatially distributing the housing need identified in the SHMA (2015), the DCLG 2012-based household projections and the August 2016 advice from ORS across the HMA, based on an analysis of the policy context and evidence base;
- provide an evidence-based Sustainability Appraisal setting out the anticipated significant positive and negative impacts of each option (including opportunities to deliver infrastructure, employment development, regeneration benefits, etc.) and potential mitigation measures (where relevant); and
- facilitate the development of a draft Memorandum of Understanding (MoU) between the four authorities which sets out a high level agreement as to how new housing should be distributed across the HMA.

These activities are collectively referred to as the Strategic Spatial Options Study. It is anticipated that the study will provide a critical piece of evidence for demonstrating that the key strategic issue of housing growth has been robustly addressed and that the Duty to Co-operate has been clearly complied with.

1.2 Sustainability Appraisal

As part of the Strategic Spatial Options Study, a Sustainability Appraisal (SA) has been undertaken to assist in determining the most appropriate housing growth and distribution option for the HMA.

³ Opinion Research Services (August 2016). Updating the Overall Housing Need Based on 2014 projections for West Essex & East Herts.

⁴ Hardisty Jones Associates (September 2015) Economic Evidence to Support the Development of the OAHN for West Essex and East Herts <http://www.uttlesford.gov.uk/CHttpHandler.ashx?id=5438&p=0>.

⁵ The FEMA covers the four authority areas, but also includes: Broxbourne, a fringe area comprising all of the immediately adjacent local authorities; and a link to central London.

⁶ Paragraph 481, National Planning Policy Framework

http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

In addition, the options have also been subject to transport modelling by Essex County Council and Habitat Regulations Assessment screening by AECOM. The options themselves have also been informed by a Strategic Site Assessment study looking at the appropriateness of strategic sites in and around Harlow town and their capacity to contribute to housing need.

SA considers and communicates the likely significant effects of options in terms of key sustainability issues. The aim of SA is to inform and influence the decision-making with a view to avoiding or mitigating negative effects and maximising positive ones. Through this approach, the SA seeks to contribute to more sustainable development.

It should be noted that the SA was not undertaken in line with the requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 which transpose into national law European Union Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment' (the Strategic Environmental Assessment or SEA Directive). The SEA Directive applies to certain plans and programmes and requires an assessment of a 'draft plan' as well as 'reasonable alternatives'. In this case, the focus is solely on reasonable alternatives and there is no 'draft plan' being prepared. Instead, it is anticipated that the selected alternative will be reflected in the content of the local plans for East Herts, Epping Forest, Harlow and Uttlesford Districts. Furthermore, the SEA Directive applies to plans and programmes required under 'legislative, regulatory or administrative provisions' and does not apply to plans and programmes prepared on a voluntary basis, as is the case here with respect to the reasonable alternatives. For these reasons, a formal assessment in line with the SEA Directive has not been undertaken. It should be noted, however, that the four constituent local plans will be subject to an assessment in line with the SEA Directive's requirements.

1.3 Spatial distribution options considered

As part of the Strategic Spatial Options Study, a range of spatial options for distributing housing across the HMA were considered. Three levels of growth were considered:

- ~46,100 new homes in line with the 2015 SHMA
- ~49,638 new homes in line with the DCLG 2012-based household projections
- ~57,400 new homes in line with advice from ORS suggesting a revised OAHN of 54,608 new homes taking into account the DCLG 2014-based household projections

In particular, the spatial options explored different levels of growth in and around Harlow, a key urban centre within the HMA:

- ~10,500 (lower growth)
- ~14,150 (medium growth)
- ~17,650 (higher growth)
- ~20,985 (maximum growth)

Table 1.1 below presents the six spatial options considered and **Table 1.2** sets out the rationale for each of the alternatives considered.

Table 1.1: Spatial distribution options for the West Essex and East Hertfordshire Housing Market Area 2011 to 2033 (key figures that differentiate between the options in red)

Spatial area	Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
	Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ⁷ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ⁸)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~20985 at Harlow)
East Hertfordshire District						
'Givens' (up to July 2016)	Completions	1951	1951	1951	1951	1951
	Permissions	1839	1839	1839	1839	1839
	Windfall assumption	1120	1120	1120	1120	1120
	Sub-total	4910	4910	4910	4910	4910
Potential allocations / broad locations ('choices')	Bishop's Stortford	4321	4321	4321	3421	4321
	Buntingford	496	496	496	496	496
	East of Stevenage	600	600	600	600	600
	East of Welwyn	1350	1350	1350	1350	1350
	Harlow fringe (Sites A & E) ⁹	2750	1250	1250	4350	4350
	Harlow fringe (Site B)	0	0	0	0	160
	Harlow fringe (Site C)	0	0	0	0	50
	Harlow fringe (Site G)	0	0	0	0	900
Hertford	950	950	950	300	950	

⁷ The possibility of one of the two new settlements being located in Epping Forest District was discussed. However, Epping Forest District argued that 1,616 may be potentially allocated at North Weald and this position would only be reviewed if/when aviation is found to be unviable in the longer term; no sites of sufficient size for a new settlement have been promoted as a new settlement in the remainder of the District and much of the east of the District is relatively rural with limited public transport connections

⁸ Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion; Cross boundary developments at East of Stevenage and East of Welwyn unchanged

⁹ See Strategic Site Assessment for further information

Spatial area		Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
		Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ⁷ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ⁸)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
	Sawbridgeworth	375	375	375	0	375	375
	Ware	200	200	200	0	200	1000
	Larger villages / NP ¹⁰	500	500	500	500	500	500
	Other	337	337	337	337	337	337
	New settlement (option 1) ¹¹	N/A	N/A	0	N/A	N/A	N/A
	New settlement (option 2) ¹²	N/A	N/A	1500 ¹³	N/A	N/A	N/A
	New settlement (option 3) ¹⁴	N/A	N/A	0	N/A	N/A	N/A
	New settlement (option 4) ¹⁵	N/A	N/A	1500 ¹⁶	N/A	N/A	N/A
	New settlement (option 5) ¹⁷	N/A	N/A	0	N/A	N/A	N/A
	New settlement (option 6) ¹⁸	N/A	N/A	0	N/A	N/A	N/A
	Sub-total	11879	10379	13379	11354	13479	15389
East Hertfordshire District Total		16789 (OAHN = 16400)	15289 (OAHN = 16400)	18289 (OAHN = 16400)	16264 (OAHN = 16400)	18389 (OAHN = 16400)	20299 (OAHN = 19427)
Epping Forest							

¹⁰ Allocation to include facilitation of neighbourhood planning

¹¹ Location on the A10 corridor - north

¹² Location on the A120 corridor (Little Hadham)

¹³ Assume 1500 at each of two new settlements; option 2 (Little Hadham) and option 4 (Watton at Stone) are being tested under Option C for the purposes of the transport modelling

¹⁴ Location in the Hunsdon area

¹⁵ Location on the A602 corridor (Watton at Stone)

¹⁶ Assume 1500 at each of two new settlements; option 2 (Little Hadham) and option 4 (Watton at Stone) are being tested under Option C for the purposes of the transport modelling

¹⁷ Location on the A10 corridor - central

¹⁸ Location on the A507 corridor

Spatial area		Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
		Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ⁷ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ⁸)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
'Givens' (up to March 2016)	Completions	1007	1007	1007	1007	1007	1007
	Permissions	747	747	747	747	747	747
	Windfall assumption	1394	1394	1394	1394	1394	1394
	Sub-total	3148	3148	3148	3148	3148	3148
Epping Forest District part of the Harlow fringe	Latton Priory	1250	1350	350	2000	2000	2250
	West Sumners	1000	0	1000	1100	1100	1200
	West Katherines	750	0	0	800	800	1100
	East of Harlow	500	0	0	1500	1500	750
	West Pinnacles	0	0	0	0	0	1000
	Land at Riddings Lane	0	0	0	0	0	50
	Sub-total	3500	1350	1350	5400	5400	6350
Potential allocations / broad locations ('choices')	Chigwell	410	410	410	0	410	410
	Chipping Ongar	314	314	314	55	314	314
	Epping	513	513	513	413	513	513
	Loughton/Buckhurst Hill	892	892	892	1101	892	1101
	Theydon Bois	148	148	148	0	148	148
	Waltham Abbey	406	406	406	196	406	406
	North Weald ¹⁹	1616	1616	1616	0	1616	1616
	Larger villages / NP ²⁰	146	146	146	0	146	146

¹⁹ North Weald (including the Airfield) is subject to an existing masterplan (2014) prepared by Epping Forest District Council

Spatial area		Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
		Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ⁷ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ⁸)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
	Sub-total	7945	5795	5795	7165	9845	11004
Epping Forest District Total		11093 (OAHN = 11300)	8943 (OAHN = 11300)	8943 (OAHN = 11300)	10313 (OAHN = 11300)	12993 (OAHN = 11300)	14152 (OAHN = 13278)
Harlow District							
'Givens'(up to 1 April 2016)	Completions	1023	1023	1023	1023	1023	1023
	Permissions	3488	3488	3488	3488	3488	3488
	Windfall assumption	0	0	0	0	0	0
	Princess Alexandra Hospital	0	0	0	0	0	675
	Sub-total	4511	4511	4511	4511	4511	5186
'Choices'	Urban brownfield	1389	1389	1389	1389	1389	1389
	Greenfield (east of Harlow)	2000	2000	2000	2000	2000	2600
	Sub-total	3389	3389	3389	3389	3389	3989
Harlow District Total		7900 (OAHN = 5900)	7900 (OAHN = 5900)	7900 (OAHN = 5900)	7900 (OAHN = 5900)	7900 (OAHN = 5900)	9175 (OAHN = 7824)
Uttlesford District							
'Givens' (up to 1 April 2016)	Completions	1914	1914	1914	1914	1914	1914
	Permissions	5202	5202	5202	5202	5202	5202
	Windfall assumption	900	900	900	900	900	900
	Sub-total	8016	8016	8016	8016	8016	8016
Potential	Great Dunmow	500	500	500	500	500	750

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²⁸ Allocation to include facilitation of neighbourhood planning

Spatial area		Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
		Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ⁷ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ⁸)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
allocations / broad locations ('choices')	Saffron Walden	500	500	500	500	500	750
	New settlement A120 (1) ²¹	2000	4000	2000	2000	2000	1400
	New settlement A120 (2) ²²	1000	2500	1000	1000	1000	1400
	Larger villages / NP ²³	500	500	500	250	500	200
	Other	0	0	0	0	0	100
	Sub-total	4500	8000	4500	4250	4500	4600
Uttlesford District Total		12516 (OAHN = 12500)	16016 (OAHN = 12500)	12516 (OAHN = 12500)	12266 (OAHN = 12500)	12516 (OAHN = 12500)	12616 (OAHN = 14080)
Total in and around Harlow		14150 (medium growth)	10500 (lower growth)	10500 (lower growth)	17650 (higher growth)	17650 (higher growth)	20985 (maximum growth)
Grand Total		48298 (OAHN = 46100)	48148 (OAHN = 46100)	47648 (OAHN = 46100)	46743 (OAHN = 46100)	51798 (CLG 2012-based household projections = 49638 ²⁴)	56242 (OAHN = 46100; however, latest ORS advice = 54608)

The rationale for considering these options, and not appraising alternatives deemed to be 'unreasonable' is presented in **Tables 1.2** and **1.3**, respectively.

²¹ Land at Easton Park

²² Land at Boxted Wood/Andrewsfield developed jointly with Braintree (NB access through Uttlesford which might facilitate quicker delivery on the Uttlesford side)

²³ Allocation to include facilitation of neighbourhood planning

²⁴ The SHMA states "PPG identifies that the starting point for estimating housing need is the CLG 2012-based household projections. For the 22-year period 2011-33, these projections suggest an increase of 49,638 households across the West Essex and East Hertfordshire HMA: an average growth of 2,256 households each year, comprised of 779 in East Hertfordshire, 653 in Epping Forest, 326 in Harlow and 498 in Uttlesford."

Table 1.2: Rationale for reasonable alternatives considered

Reasonable alternative	Rationale
Spatial options to deliver ~46,100 new homes across the SHMA area	
<p>Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)</p>	<p>This option is predicated on two principles: firstly, a mid-range level of growth in and around Harlow town and, secondly, the assumption that each local authority should accommodate its identified OAHN within its own district boundaries. A strong focus on development in and around Harlow is a sensible starting point for developing reasonable alternatives in that the town represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment; its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for the town. Testing an alternative premised on each authority meeting its own housing needs was considered important in light of the NPPF's requirement that "local planning authorities should positively seek opportunities to meet the development needs of their area" (para. 14).</p>
<p>Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)</p>	<p>While a strong focus on development in and around Harlow town was considered an important starting point for developing reasonable alternatives (see rationale for Option A above), a degree of uncertainty surrounding the extent and likely provision of the additional infrastructure necessary to support growth suggested a need to test a lower overall housing figure for the area in and around Harlow. This, in turn, raised the question of where the growth that might otherwise have been located in and around Harlow should instead be focused (~3,500 new homes). In light of the conclusions of the Inspector examining the Uttlesford Local Plan (December 2014), it was considered reasonable to consider an option involving an accelerated level of development at two new settlements along the A120 (including one straddling the border with Braintree District): <i>"There appeared to me to be fairly widespread recognition that some form of 'new settlement(s)' may form an appropriate means for catering for the future long-term growth of the District and, if so, that this should be on a scale bold enough to achieve maximum possible sustainable critical mass and a long term solution, especially if there are judged to be limits as to how far relatively small towns with the characters of Saffron Walden and Great Dunmow can grow sustainably, attractively, and in an integrated way through successive phases of peripheral expansion"</i> (available at: www.uttlesford.gov.uk/CHttpHandler.ashx?id=4506&p=0).</p>
<p>Option C – Less development at Harlow and two new settlements in East Herts (NB ~10,500 at Harlow)</p>	<p>While a strong focus on development in and around Harlow town was considered an important starting point for developing reasonable alternatives (see rationale for Option A above), a degree of uncertainty surrounding the extent and likely provision of the additional infrastructure necessary to support growth suggested a need to test a lower overall housing figure for the area in and around Harlow. This, in turn, raised the question of where the growth that might otherwise have been located in and around Harlow should instead be focused (~3,500 new homes). In light of existing work undertaken by East Herts DC investigating six potential sites for a new settlement within their District, in discussion with East Herts, it was considered reasonable to investigate the implications of two of these delivering significant new housing in the plan period. In discussion with East Herts DC, two of the six locations were selected for testing (Little Hadham and Watton-at-Stone).</p>

Reasonable alternative	Rationale
<p>Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA)</p>	<p>In light of significant constraints to development across the HMA, in particular the extent of Green Belt in Epping Forest District and the southern part of East Herts District, it was considered reasonable to test an option that focused a higher level of development in and around Harlow with correspondingly lower levels of development in more constrained parts of the HMA (for example, at Bishop’s Stortford, Hertford, Sawbridgeworth and Ware in East Herts District and several settlements in Epping Forest District, notably Chigwell and Theydon Bois). Under this option, a significant development at North Weald in Epping Forest District was also removed. This option included the very maximum level of development considered conceivable in the plan period at Gilsten to the north of Harlow in East Herts District together with 5,400 new homes in the Epping Forest District part of the Harlow ‘fringe’.</p>
<p>Spatial option to deliver ~49,638 new homes</p>	
<p>Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)</p>	<p>The SHMA stated that “PPG [Planning Practice Guidance] identifies that the starting point for estimating housing need is the CLG 2012-based household projections. For the 22-year period 2011-33, these projections suggest an increase of 49,638 households across the West Essex and East Hertfordshire HMA: an average growth of 2,256 households each year, comprised of 779 in East Hertfordshire, 653 in Epping Forest, 326 in Harlow and 498 in Uttlesford.” In light of this, it was considered sensible to test an option of around 50,000 new homes. Reflecting Option D above, it was considered logical to explore an option that focused ~17,650 new homes in and around Harlow <u>and</u> which reinstated the development at the more constrained settlements removed under Option D as well as development at North Weald.</p>
<p>Spatial option to deliver ~57,400 new homes</p>	
<p>Option F – Maximum growth across the HMA (NB ~20,985 at Harlow)</p>	<p>Following an update of the HMA housing need by Opinion Research Services (ORS) (August 2016) in light of new information including the DCLG 2014-based household projections, it was considered prudent to test an option that provided for at least 54,608 new homes in the plan period. In order to reach this figure, it was necessary to include several new sites including two hitherto unconsidered sites to the north of Harlow in East Herts District and two previously unconsidered sites in the Epping Forest District part of the Harlow fringe. Altogether, Option F involved around 21,000 new homes in and around Harlow town.</p>

Table 1.3: Rationale for alternatives rejected as unreasonable

Unreasonable alternatives	Reason for rejection
Option X – Focus growth in areas beyond the Green Belt	<p>Given the extensive Green Belt in Epping Forest District and the southern part of East Herts District, it was considered sensible to ask the question as to whether the level of new development suggested in the SHMA could be conceivably accommodated outside of the existing Green Belt. However, such an approach was considered unreasonable due to:</p> <ul style="list-style-type: none"> • the rural nature of much of East Herts and Uttlesford districts (outside the Green Belt), which if development were allocated there, would likely lead to poor links between jobs and homes, limited or sporadic infrastructure to support new homes, poor access to services and facilities, limited public transport for new residents, and further trips generated from new residents utilising rural roads; • known significant constraints at Buntingford outside the Green Belt (e.g. the lack of capacity on the A10); • the Uttlesford 2014 Examination in Public Inspector’s conclusions regarding potential capacity at Saffron Walden and Great Dunmow; and • the fact that land at Great Chesterford in Uttlesford to the north of the HMA is linked to a different HMA.
Option Y – To develop less than ~10,500 new homes in and around Harlow	<p>This option was considered unreasonable as a strong focus on development in and around Harlow is a sensible starting point for developing reasonable alternatives. This reflects the fact that the town represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment as well as its Enterprise Zone status ; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for the town.</p>

2 Approach to the SA

2.1 Developing an SA Framework for the assessment

When undertaking an SA, options and other components of plans (e.g. policies) are typically appraised using an 'SA Framework' of appraisal questions. The SA Framework provides a benchmark or yardstick against which sustainability effects can be identified and evaluated based on a structured and consistent approach.

To reflect this approach, an SA Framework of appraisal questions was developed as part of the Strategic Spatial Options Study.

2.2 SA Framework

Table 2.1 overleaf presents the SA Framework of appraisal questions for the Strategic Spatial Options Study.

The appraisal questions are presented under a series of key 'sustainability themes', as follows:

- Biodiversity
- Community and wellbeing
- Economy and employment
- Historic environment
- Housing
- Land
- Landscape
- Low carbon development
- Transport
- Water

The selected sustainability themes incorporate the 'SEA topics' suggested in Annex I(f) of the SEA Directive.²⁵ These were refined to reflect a broad understanding of the anticipated scope of effects.

It is intended that presenting the SA information under these themes will provide a clear and concise approach to presenting appraisal findings and help enable the reader to easily locate the information of greatest interest to them.

²⁵ The SEA Directive does not set out to prescribe particular issues that should and should not be a focus of assessment, beyond requiring a focus on 'the environment, **including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors**' [our emphasis]

Table 2.1: SA Framework

Sustainability theme	Appraisal questions: will the option...
Biodiversity	<ul style="list-style-type: none"> • Support continued improvements to the status of the Epping Forest SAC? • Support continued improvements to the status of the Lee Valley SPA? • Support continued improvements to the status of the SSSIs located in the sub-region? • Protect and enhance county and local wildlife sites? • Protect ancient woodland? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Protect and enhance the sub-region's geodiversity resource? • Limit the effects from air pollution on biodiversity? • Increase the resilience of biodiversity in the plan area to the effects of climate change, including through the enhancement of ecological connections and green infrastructure networks?
Community and wellbeing	<ul style="list-style-type: none"> • Improve the availability and accessibility of key local facilities for all age groups, including specialist services for disabled and older people? • Maintain or enhance the quality of life of existing local residents? • Promote the development of a range of high quality, accessible community facilities? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Provide and enhance the provision of community access to green infrastructure? • Support enhancements to air quality, including in the five Air Quality Management Areas in the sub-region?
Economy and employment	<ul style="list-style-type: none"> • Provide for the needs of businesses (including enhancing the range of premises, services, infrastructure, and availability of a skilled workforce)? • Enhance the vitality of local centres? • Promote skills development and participation in further and higher education? • Support the visitor economy?
Historic environment	<ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Support the integrity of conservation areas and their settings? • Conserve and enhance historic landscapes and townscapes? • Conserve the historic settlement patterns of towns and villages? • Conserve and enhance local diversity and distinctiveness?
Housing	<ul style="list-style-type: none"> • Provide quality and flexible homes that meet people's needs? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Land	<ul style="list-style-type: none"> • Promote the use of previously developed land? • Support the remediation of contaminated land? • Avoid the development of the best and most versatile agricultural land?
Landscape	<ul style="list-style-type: none"> • Conserve and enhance landscape character? • Conserve and enhance local distinctiveness? • Promote enhancements to green infrastructure networks? • Support the integrity of conservation areas and their settings?

Sustainability theme	Appraisal questions: will the option...
Low carbon development	<ul style="list-style-type: none"> • Limit the increase in the carbon footprint of the sub-region resulting from population growth? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Reduce the need to travel?
Transport	<ul style="list-style-type: none"> • Reduce the need to travel through sustainable patterns of land use and development? • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure improvements?
Water	<ul style="list-style-type: none"> • Support improvements to water quality? • Minimise water consumption? • Ensure that no development takes place in areas at higher risk of flooding, taking the likely effects of climate change into account? • Improve green infrastructure networks to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk?

2.3 Approach to the assessment

The options presented in Table 1.1 above have been appraised against the SA Framework.

In undertaking the appraisal, the proposed options were reviewed to determine the likelihood of positive or negative effects under each theme.

Where a causal link between the options and sustainability themes was established, impacts were identified on the basis of professional judgment with reference to the evidence base. The appraisal was undertaken with reference to the criteria in Schedule 1 of the SEA Regulations, that is:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (for example, due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to-
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values; or
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, community or international protection status.

Every effort was made to predict effects accurately; however, this is inherently challenging given the strategic nature of the options considered. Because of the uncertainties involved, there was a need to exercise caution when identifying and evaluating significant effects and ensure that assumptions were explained in full. In many instances it was not possible to predict significant effects, but it was possible to comment on merits (or otherwise) in more general terms.

The assessment findings are presented in Chapter 3. These have been presented in a series of tables which present the findings of the assessment by sustainability theme.

3 Assessment findings

Table 3.1: Assessment findings, Biodiversity

Biodiversity	
<p>Will the options:</p> <ul style="list-style-type: none"> • Support continued improvements to the status of the Epping Forest SAC? • Support continued improvements to the status of the Lee Valley SPA? • Support continued improvements to the status of the SSSIs located in the sub-region? • Protect and enhance county and local wildlife sites? • Protect ancient woodland? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Protect and enhance the sub-region's geodiversity resource? • Limit the effects from air pollution on biodiversity? • Increase the resilience of biodiversity in the plan area to the effects of climate change, including through 	<p>The sustainability performance of the five options relating to the biodiversity theme is closely linked to the specific location of development and its proximity to sites designated for their nature conservation interest.</p> <p>In relation to Bishop's Stortford, Option D, through reducing housing provision in the town by 900 dwellings will help limit the potential for effects on sensitive nature conservation sites to the south of the town, including the Thorley Flood Pound SSSI, the Little Hallingbury Marsh SSSI and the Sawbridgeworth SSSI. SSSI Impact Risk Zones (IRZs) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this context the southern part of Bishop's Stortford is within the IRZ for 'residential development of 100 units or more'. As such similar development taken forward may have potential effects on these SSSIs. For this reason, Option D has increased potential for avoiding effects on these SSSIs proposing locations with fewer biodiversity sensitivities.</p> <p>Option D also has reduced potential to lead to effects on Hatfield Forest National Nature Reserve / SSSI, which is located to the east of Bishop's Stortford.</p> <p>In terms of the Harlow fringe (Gilston), this area is relatively unconstrained by biodiversity considerations. As such Options D, E and F, which put forward 4,350 dwellings for this location, may help alleviate effects on designated sites elsewhere. Option B and C, which put forward 1,250 dwellings at this location and consequently less development elsewhere, are less likely to do this.</p> <p>The locations of Little Hadham and Watton-at-Stone are relatively unconstrained regarding nationally designated nature conservation sites. As such the delivery of 1,500 dwellings in each location under Option C will help limit potential effects at designated nature conservation sites.</p> <p>Option D will deliver fewer houses at Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey and North Weald, helping to limit effects on biodiversity at these locations. The option will however lead to a higher level of housing provision in the Harlow Fringe and (to a lesser extent) at Loughton/Buckhurst Hill.</p> <p>In relation to Uttlesford, Option C will significantly increase the number of dwellings to be delivered to two new settlements at the A120. One of these locations, Land at Easton Park, is located close to the High Wood, Dunmow SSSI, which is a wet Ash-Maple and Pedunculate Oak-Hornbeam wood (including ancient woodland) associated with a rich and varied flora. Both settlements are likely to impact on the Flich Way nature route in terms of its biodiversity and quiet enjoyment. The proposed</p>

the enhancement of ecological connections and green infrastructure networks?

location for development is within the IRZ for 'residential development of 100 units or more'. The second proposed location for a new settlement at Land at Boxted Wood/Andrewsfield is not located within an IRZ- however Boxted Wood itself is ancient woodland.

In terms of the additional dwellings relating to the further 'choices', Options D, E and in particular F will deliver an increased level of housing at the Latton Priory, West Sumners, West Katherines and East of Harlow sites. West Sumners, Latton Priory and (part of) West Katherines are within the IRZ for the Harlow Woods SSSI for 'residential development of 100 units or more'. Alongside, Latton Priory is also in the IRZ for the Epping Forest SSSI. The East of Harlow sites are not within IRZs for the type of development proposed.

In terms of potential in-combination effects of potential allocations in locations in proximity to Epping Forest, all of the options all have potential to lead to effects on the Epping Forest SAC/SSSI through allocations at Theydon Bois, Loughton/Buckhurst Hill and Epping, in addition to growth at Harlow. Whilst the distribution between these settlements varies between Option A, B, C, E and F (which promote a higher level of development at Theydon Bois and Epping) and Option D and F (which promote a higher level of development at Loughton/Buckhurst Hill, the overall quantum of development in these settlements is similar. This is with the exception of the Maximum Growth option (Option F), which delivers significantly more housing across these settlements.

In relation to the Lee Valley SPA/Ramsar, whilst Option D proposes a lower level of development at Waltham Abbey, the settlement closest to this internationally designated site in the study area, comparative effects are likely to be limited by the relatively limited number of additional dwellings proposed through Options A, B, C, E and F (406 dwellings).

Potential effects on the Lee Valley SPA/Ramsar, Epping Forest SAC and Wormley-Hoddesdonpark Woods SAC have been examined in more detail through the HRA process undertaken with respect to the strategic spatial options²⁶. This considered: disturbance from recreational activities and urbanisation; atmospheric pollution; water abstraction; and water quality.

In terms of recreational pressures, whilst significant effects from the options considered were not anticipated on the three sites, it was recommended that all new development deliver greenspace in-line with the Natural England ANG standard to ensure it is self-sufficient. In relation to air quality, it was considered that the options considered would not lead to a likely significant effect upon the three sites either alone or in combination with other projects or plans. In relation to water abstraction, it was concluded that delivery of the options would not result in adverse effects on the Lee Valley SPA/Ramsar site through excessive water drawdown, either alone or in combination with other plans and projects. It was also evaluated that there would not be a water quality effect from the options on Lee Valley SPA/Ramsar site either alone or in combination with other projects and plans.

In relation to biodiversity action plan priority habitats, all options have the potential to lead to the loss of these if development is inappropriately located and poorly designed. Similarly all of the options have the potential to lead to adverse effects on priority species without the appropriate location, design and layout of development and the integration of appropriate green

²⁶ As presented in AECOM (September 2016) East Herts District Plan Habitats Regulations Assessment

Biodiversity

infrastructure provision.

The delivery of high quality green infrastructure provision is a key means of enhancing biodiversity habitats and improving ecological connections. In this context, it is possible that the larger scale developments proposed by Option D, E and F around Harlow and by Option C at the two new settlements at locations close to the A120 will facilitate opportunities for targeted biodiversity enhancements. This is linked to the delivery of Section 106 agreements likely to be levied on the larger development area at these locations promoted through these options. Whilst all new developments involving one or more dwellings are liable for the community infrastructure levy, concentrating the delivery of housing at fewer and larger sites may help secure additional contributions to site specific mitigation through Section 106 planning agreements. It should be noted however that such contributions are typically required to make a development proposal acceptable in planning terms that would not otherwise be acceptable.

Table 3.2: Assessment findings, Community and Wellbeing

Community and Wellbeing

Will the options:

- Improve the availability and accessibility of key local facilities for all age groups, including specialist services for disabled and older people?
- Maintain or enhance the quality of life of existing local residents?
- Promote the development of a range of high quality, accessible community facilities?
- Encourage and promote social cohesion and encourage active involvement of local people in community activities?

The options which plan for an increased level of housing provision to the largest settlements in the HMA (including Harlow and Bishop’s Stortford) will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will likely support social inclusion. In this context Option D and E, which deliver in the region of 17,650 dwellings at Harlow, and Option F, which delivers 20,985 dwellings, will deliver an increased level of housing to the largest settlement in the HMA, with the widest range of amenities. Option D will however deliver 900 fewer dwellings at Bishop’s Stortford than the other options.

Directing increased levels of housing delivery to the larger settlements will support access to services and facilities for those living within or close to these settlements. However there is significant potential for enhancements to the vitality of smaller settlements in the HMA to be secured through increased population growth. This may support the availability and viability of services and facilities in smaller settlements, helping to improve access to services and facilities, promoting social connections and supporting physical activity. In this context, Options B, C and E, which promote an increased proportion of housing in the parts of the HMA outside of Harlow may support enhancements to such facilities in these locations. It should be noted, however, such an approach has the potential to lead to an increased dispersal of development without the requisite services being delivered. Such an approach also has the potential to increase the need to travel for employment purposes - for example Uttlesford District has two residents per job and there is a significant level of out commuting to London across the sub-region.

The delivery of higher levels of housing growth has the potential to lead to effects on health and wellbeing through increasing road safety issues and impacts on air and noise from increased traffic flows at certain locations. This may have impacts on the health and wellbeing of residents. Effects therefore depend on the detailed location of new development areas and the integration of elements such as sustainable transport and green infrastructure provision.

Community and Wellbeing

- Provide and enhance the provision of community access to green infrastructure?
- Support enhancements to air quality, including in the five Air Quality Management Areas in the sub-region?

Regarding the Air Quality Management Areas (AQMAs) declared within the HMA, Options A-E have been modelled as having similar effects on traffic increases within the areas declared as AQMAs. In relation to the Sawbridgeworth AQMA, modelling indicates that there will be significant increases in traffic flows on London Road, (on which the AQMA is centred) through Options A-E. Minor traffic increases have been modelled for Options A-E in Epping on the routes where traffic has resulted in the declaration of an AQMA on High Road (Bell Common). No significant increases are currently modelled affecting the AQMA in Bishop’s Stortford or the AQMA in Saffron Walden.

The delivery of high quality green infrastructure provision will be a key contributor to health and wellbeing in the HMA. In this context it is possible that the larger scale developments proposed by Options D, E and F around Harlow and by Option C at the two new settlements at locations close to the A120 will facilitate opportunities for targeted biodiversity enhancements. This is linked to the delivery of Section 106 agreements likely to be levied on the larger development areas at the locations promoted through these options. Whilst all new developments involving one or more dwellings are liable for the community infrastructure levy, concentrating the delivery of housing at fewer and larger sites may help enable the securing of additional contributions to site specific mitigation through Section 106 planning agreements. It should be noted however that such contributions are typically required to make a development proposal acceptable in planning terms that would not otherwise be acceptable.

Table 3.3: Assessment findings, Economy and Employment

Economy and Employment

- Will the options:**
- Provide for the needs of businesses (including enhancing the range of premises, services, infrastructure, and availability of a skilled workforce)?
 - Enhance the vitality of local centres?
 - Promote skills development and participation in further and higher education?
 - Support the visitor economy?

Overall, through delivering a larger number of dwellings in the sub-region, Options E and F have the potential to deliver increased levels of housing provision, with additional potential for support HMA economic vitality.

Options F, D and E, and to a lesser extent, Option A will do more to support the economic vitality of Harlow through allocating a larger proportion of development in the vicinity of the town. This will help rejuvenate the town centre and support Harlow’s status as an Enterprise Zone. Options A, B, C, E and F through increasing the proportion of development to be located in a wider range of settlements, have the potential to do more to support the economic vitality of a broader range of settlements. These include Bishop’s Stortford, Hertford, Sawbridgeworth, Ware, Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey Saffron Walden and Great Dunmow and the larger villages in Uttlesford. Having said this, economic vitality can also be adversely affected by increased traffic congestion associated with new development.

Table 3.4: Assessment findings, Historic Environment

Historic Environment	
<p>Will the options:</p> <ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Support the integrity of conservation areas and their settings? • Conserve and enhance historic landscapes and townscapes? • Conserve the historic settlement patterns of towns and villages? • Conserve and enhance local diversity and distinctiveness? 	<p>Option D will help limit potential effects on the fabric and setting of the historic environment in Bishop’s Stortford, Hertford, Sawbridgeworth, Ware, Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey, at North Weald, Saffron Walden and Great Dunmow and the larger villages in Uttlesford by limiting development in the vicinity of these locations.</p> <p>Options D, E and F will increase the potential for effects on the nationally designated features present in the Harlow fringe, including the scheduled monuments and listed buildings located to the south of the town.</p> <p>The historic environment of Saffron Walden has the most potential to be impacted on by the higher level of development in the town proposed through Option F. All of the options have the potential to have impacts on the listed gardens at Easton Park West of Great Dunmow.</p> <p>In relation to the historic environment, conservation areas are designated locally for their special architectural and historic interest, and comprise particular concentrations of features of historic environment interest. In this context conservation areas are present in many of the settlements potentially affected by the level of housing delivery proposed through the options. Whilst potential effects on conservation areas from new housing depends on the detailed location, design and layout of development, a number of broad conclusions can be made.</p> <p>In relation to the conservation areas in Great Dunmow and Saffron Walden, Option F has the largest potential to have impacts on their fabric and setting through proposing an increased level of housing delivery in these settlements. In relation to the three conservation areas in Loughton (York Hill, Staples Road, Baldwins Hill), Options D and F have most potential to affect their setting and fabric. For similar reasons Option F has increased potential to have impacts on the Ware Conservation Area, and Option C has increased potential to have impacts on the fabric and setting of the Watton at Stone Conservation Area. In relation to the conservation areas in Hertford, Sawbridgeworth, Chigwell, Chipping Ongar (x3 conservation areas: Great Stoney School, Ongar and Chipping Ongar), Epping (x3 conservation areas: Bell Common, Coopersale and Epping), Theydon Bois and Waltham Abbey, all of the options have the potential to have comparable effects due to similar levels of housing delivery. This is with the exception of Option D, which limits the housing delivery numbers proposed for these settlements.</p>

Table 3.5: Assessment findings, Housing

Housing	
<p>Will the options:</p> <p>Provide quality and flexible homes that meet people’s needs?</p>	<p>Taken as a whole, at the HMA level, all six options exceed the OAHN for the Housing Market Area (46,100). In relation to meeting the four districts’ individual housing needs:</p> <ul style="list-style-type: none"> • Option A will meet East Herts’, Harlow’s and Uttlesford’s OAHN, but not Epping Forest’s (however, the figure for Epping Forest is just shy of OAHN).

Provide housing in sustainable locations that allow easy access to a range of local services and facilities?

- Option B will meet Harlow’s and Uttlesford’s OAHN, but not East Herts’ or Epping Forest’s.
- Option C will meet the delivery of East Herts’, Harlow’s and Uttlesford’s OAHN, but not Epping Forest’s.
- Option D will meet only Harlow’s OAHN, and not East Herts’ (just shy), Epping Forest’s or Uttlesford’s (just shy).
- Options E and F will meet all four districts’ OAHN.

More specifically, through limiting housing delivery in Bishop’s Stortford, Hertford, Sawbridgeworth, Ware, Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey Saffron Walden and Great Dunmow and the larger villages in Uttlesford, Option D may do less to meet localised housing needs at these locations.

Overall, through delivering a larger number of dwellings in the sub-region, Options D, E and F have most potential to deliver a broader range of housing types and tenures. In this context, higher levels of overall growth have the potential to deliver an increased range of housing (including affordable housing), with accompanying infrastructure provision, and will do more to support services and facilities.

Table 3.6: Assessment findings, Land

Land	
<p>Will the options:</p> <ul style="list-style-type: none"> • Promote the use of previously developed land? • Support the remediation of contaminated land? • Avoid the development of the best and most versatile agricultural land? 	<p>All of the options, due to the lack of available brownfield land in the HMA, will lead to the significant loss of greenfield land. In this context each Local Planning Authority in the sub-region have completed a Strategic Housing Land Availability Assessment, and all reasonable and available opportunities for use of brownfield land have been explored.</p> <p>Due to the lack of brownfield land available in Harlow, Options D, E and F and to a lesser extent, Option A, have increased potential to lead to the loss of the Best and Most Versatile Agricultural Land present in the vicinity of Harlow, including Grade 2 and Grade 3a land present in this area. It should be noted however that recent (post 1988) classification of agricultural land has not been undertaken in the area.</p> <p>Through limiting housing delivery in Bishop’s Stortford, Hertford, Sawbridgeworth, Ware, Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey Saffron Walden and Great Dunmow and the larger villages in Uttlesford, Option D is likely to limit the loss of the Best and Most Versatile Agricultural Land in the vicinities of these locations.</p> <p>The lack of available brownfield land in Harlow will also limit opportunities for the remediation of contaminated land.</p>

Table 3.7: Assessment findings, Landscape

Landscape	
<p>Will the options:</p> <ul style="list-style-type: none"> • Conserve and enhance landscape character? • Conserve and enhance local distinctiveness? • Promote enhancements to green infrastructure networks? • Support the integrity of conservation areas and their settings? 	<p>All of the options, due to the lack of available previously developed land in the sub-region, will lead to the loss of greenfield land; this has the potential to lead to impacts on landscape character.</p> <p>Through limiting housing delivery in Bishop’s Stortford, Hertford, Sawbridgeworth, Ware, Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey, Saffron Walden and Great Dunmow, and larger villages in Uttlesford, Option D may reduce the potential for effects on landscape and townscape character in the vicinity of these locations. Options D, E and F, and to a lesser extent, Option A, however have increased potential to lead to impacts on landscape character around Harlow. In terms of Green Belt, Option C, which proposes 6,500 dwellings rather than 2,800-3,000 dwellings proposed by the other options at the two locations close to the A120 (which are outside of the Green Belt) will help limit the overall loss of Green Belt in the sub region. No AONBs or nationally designated landscapes are located in the HMA. Option F would however potentially lead to impacts on the listed gardens at Easton Park at Great Dunmow.</p> <p>Conservation areas are key designations supporting local distinctiveness, townscape character and the quality of the built environment. In this context conservation areas are present in many of the settlements potentially affected by housing delivery proposed through the options. Whilst potential effects on conservation areas from new housing proposed through the options depends on the detailed location, design and layout of development, a number of broad conclusions can be made.</p> <p>In relation to the conservation areas in Great Dunmow and Saffron Walden, Options E has the largest potential to have impacts on the setting of these designated areas through delivering a higher level of housing in the vicinity of the settlements. In relation to the three conservation areas in Loughton (York Hill, Staples Road, Baldwins Hill), Options D and F have most potential to affect their setting. For similar reasons Option F has increased potential to have impacts on the Ware Conservation Area, and Option C has increased potential to have impacts on the setting of the Watton at Stone Conservation Area. In relation to the conservation areas in Hertford, Sawbridgeworth, Chigwell, Chipping Ongar (x3 conservation areas: Great Stoney School, Ongar and Chipping Ongar), Epping (x3 conservation areas: Bell Common, Coopersale and Epping), Theydon Bois and Waltham Abbey, all of the options have the potential to have similar impacts due to comparable housing delivery in the settlements. This is with the exception of Option D, which limits the housing proposed for these settlements.</p> <p>Options D, E and F, through potentially delivering in the region of 2,000 to 2,500 dwellings at Latton Priory may have significant effects on landscape character to the south of Harlow, linked to development of the ridgeline at this location.</p>

Table 3.8: Assessment findings, Low Carbon Development

Low Carbon Development	
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Low Carbon Development

Will the options:

Limit the increase in the carbon footprint of the sub-region resulting from population growth?

- Promote the use of sustainable modes of transport, including walking, cycling and public transport?
- Reduce the need to travel?

Overall, through delivering an increased level of housing growth, Options E and F will do most to increase the built footprint of the HMA. In this context these options have the most potential to stimulate the largest increases in greenhouse gas emissions. However the distribution of development is an important consideration.

Road transport is an increasingly significant contributor to greenhouse gas emissions in the sub-region. The options which direct an increased level of housing provision to the largest settlements in the sub-region, will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will help limit the need to travel to services and facilities, therefore helping to limit emissions from transport. In this context Option D and E, which deliver in the region of 17,650 dwellings at Harlow, will deliver an increased level of housing to the largest settlement in the sub-region, with the widest range of amenities. Option D will however deliver 900 fewer dwellings at Bishop’s Stortford than the other four options.

Options D, E and F, and to a lesser extent, Option A, through facilitating a larger scale of housing delivery at Harlow, may enable more effective improvements to walking and cycling and public transport links. This will support climate change mitigation. However Options A, B, C, E and F which promote an increased delivery of housing in the parts of the HMA outside of Harlow, may also support the limitation of emissions from transport. Whilst such an approach has the potential to lead to an increased dispersal of development without the requisite amenities being delivered, the delivery of housing at these locations will support the vitality of these settlements, with increased potential to facilitate the development of new housing at locations which are more integrated with the existing built up area of settlements. This has the potential to limit greenhouse gas emissions through supporting infrastructure improvements and reducing the need to travel. However, spreading growth around is likely to be less sustainable than focusing at Harlow because smaller settlements will have less employment opportunities and therefore journeys to work are likely to be longer/ encourage more travel. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the ‘critical mass’ necessary to deliver new/improved public transport services to the nearest employment centres. As a result more trips are likely to be made by private car.

In terms of the delivery of low carbon and energy efficient development in the HMA, this depends on the design and layout of new development areas.

Table 3.9: Assessment findings, Transport

Transport	
<p>Will the options:</p> <ul style="list-style-type: none"> • Reduce the need to travel through sustainable patterns of land use and development? 	<p>The options which direct an increased level of housing provision to the largest settlements in the sub-region will promote accessibility and reduce the need to travel through directing housing to the settlements with the broadest range of services and facilities. In this context Options D and E, which deliver in the region of 17,650 dwellings at Harlow, and Option F, which delivers 20,985 dwellings, will deliver an increased level of housing to the largest settlement in the sub-region with the</p>

Transport

- Encourage modal shift to more sustainable forms of travel?
- Enable sustainable transport infrastructure improvements?

widest range of amenities. This provides opportunities to capitalise on the towns good transport connections (for example, good rail links to London, Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors traversing the town. Option D will however deliver 900 fewer dwellings at the second largest settlement in the sub-region, Bishop’s Stortford, than the other four options.

Accessibility will however depend on the provision of sustainable transport infrastructure to accompany new development areas. Option D, E, F, and to a lesser extent, Option A, through facilitating a larger scale of housing delivery at Harlow, may enable more effective improvements to walking and cycling and public transport links to be undertaken. However Options A, B, C and E, which promote the delivery of increased proportion of housing in the parts of the sub-region outside of Harlow, have the potential to facilitate the development of new housing at locations which are more integrated with the existing built up area of settlements, and with increased potential of supporting the viability of existing sustainable transport links at these locations. However, spreading growth across the sub-region may do more to stimulate traffic than focusing housing at Harlow because smaller settlements will have less employment opportunities. This may increase the length of journeys to work and encourage more travel. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the ‘critical mass’ necessary to deliver new/improved public transport services to the nearest employment centres. As a result more trips are likely to be made by private car.

In the context of the options considered, well located and coordinated development provides opportunities for the development of sustainable movement corridors which utilises growth to support public transport and walking and cycling corridors. As such the options considered largely make use of existing public transport nodes, facilitating the development of north/south corridors and east west transport corridors in the sub-region. The level of growth considered through the options also offer opportunities for contributing or realising the need for new infrastructure to accompany new development areas. This includes, for example, a second River Stort crossing, or enhancements to junctions on the M11.

Table 3.10: Assessment findings, Water

Water

Will the options:

- Support improvements to water quality?
- Minimise water consumption?
- Ensure that no development takes place in areas at higher risk of flooding, taking the likely effects of climate change into account?

The effect of new development areas on fluvial, surface water and groundwater flooding depends on detailed location and the implementation of measures such as sustainable drainage systems. Similarly, potential effects on water quality depend on the integration of measures to limit point and non-point source pollution. In terms of water efficiency, this depends on the incorporation of appropriate measures within new development areas.

The West Essex and East Herts sub-region has one of the highest water usage rates in the country, and water supply issues regionally have impacted issues relating to the recharge of aquifers (the main source of water for the majority of users within Hertfordshire). Water resource pressures also have significant environmental impacts, with high levels of abstraction leading to some water bodies experiencing low flows. As such, water supply has the potential to become a constraint on

- Improve green infrastructure networks to support adaptation to the potential effects of climate change?
 - Sustainably manage water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk?
- growth as it becomes more difficult to match supply with demand.
- In relation to water supply, the NPPF states that local plans should plan positively to ensure the provision of infrastructure for water supply, including an assessment of its quality and capacity (paragraphs 156, 157 and 162). However in the context of the current study, it is anticipated that the Water Resources Management Plans prepared by water supply companies will be expected to address long-term water supply issues associated with growth.

4 Spatial Option

4.1 Identifying the Spatial Option

Under the requirements of the Duty to Co-operate, the Co-operation for Sustainable Development Member Board (the Co-op Member Board) considered six options (A-F) for accommodating new housing development across the West Essex and East Hertfordshire Housing Market (HMA) area up to 2033. These six options varied in terms of: (i) the overall quantum of development to be provided for across the HMA (ranging from ~48,300 to ~56,250 new houses); and (ii) the spatial distribution of that development, in particular the amount of new housing to be accommodated in and around Harlow town. Varying the overall quantum of development allowed the Co-op Member Board to test the implications of different levels of growth including: 46,100 (the figure for objectively assessed housing need in the Strategic Housing Market Assessment, SHMA); 49,638 (a figure based on the CLG 2012-based household projections); and 54,608 (an updated OAHN figure provided by Opinion Research Services, ORS, in light of recent information including the CLG 2014-based household projections). Varying the spatial distribution of development allowed the Co-op Member Board to explore the implications of focusing different levels of development in different parts of the HMA. In particular, the options varied in terms of the level of development located in and around Harlow, the HMA's key urban centre.

The implications of the six options (A-F) were investigated through four means:

1. Transport modelling to explore their implications in relation to traffic flows and the need for road upgrades or additional highways infrastructure
2. Sustainability Appraisal to assess their implications in relation to a range of topics including biodiversity, community and wellbeing, historic environment, landscape and water
3. Habitat Regulations Assessment to determine the implications, if any, for the integrity of the Epping Forest SAC, Lee Valley SPA/Ramsar site and Wormley Hoddesdonpark Woods SAC
4. Strategic Site Assessment to assess the suitability of the potential sites in and around Harlow that could deliver new housing development

Transport modelling

The transport modelling indicated a 35-40% increase in trips on the network by 2033 based on 14,000 new homes in and around Harlow (and 48,000 across the wider HMA) (NB 14,000 equates to Option A). In light of the transport modelling, it was concluded that a major improvement at Junction 7 of the M11 and a new Junction 7A were both *essential* to deliver growth. It was also concluded that a major improvement at Junction 8 was also *essential* to support HMA growth as well as potential expansion at Stansted Airport beyond the currently consented growth of up to 35 million passengers per annum (mppa).

With respect to Harlow town, in light of the transport modelling, it was also concluded that early delivery of a second crossing over the River Stort was *essential* to enable the development of an effective north-south sustainable travel corridor, significant modal shift towards public transport, walking and cycling and wider network benefits to Harlow (NB sustainable travel corridors are also arguably a key element of any 'garden settlement' approach to development in and around Harlow). In terms of the level of development that can be accommodated in and around Harlow, the transport modelling undertaken to date indicates that growth of between 14,000 and 17,000 new homes in and around Harlow could be accommodated provided that key mitigation measures are delivered during the plan period. For this reason, agreement must be pursued on the *Memorandum of Understanding on Highways and Transportation Infrastructure for the West Essex and East Hertfordshire Housing Market Area*. Growth beyond 2033 may be possible subject to further transport modelling and the identification and delivery of additional strategic highway mitigation measures.

Sustainability Appraisal

The SA process has considered the sustainability performance of the six options with regards to a broad range of environmental and socio-economic considerations. Whilst in many respects the overall sustainability performance of many of the options considered are broadly similar, there are differences between the options in terms of the potential environmental effects that may arise and the socio-economic opportunities offered by the options in specific locations. For example Options A, B, C and E, which promote the delivery of an increased proportion of housing in the parts of the sub-region outside of Harlow, will increase the potential for supporting services and facilities across a broader range of locations than Option D. Option D, through limiting housing delivery in Bishop's Stortford, Hertford, Sawbridgeworth, Ware, Chigwell, Chipping Ongar, Epping, Theydon Bois, Waltham Abbey, Saffron Walden and Great Dunmow, and larger villages in Uttlesford, may reduce the potential for effects on landscape and townscape character, biodiversity assets and air/noise quality in the vicinity of these locations. However this would come at a significant trade-off in terms of meeting local housing needs and supporting the vitality of these settlements. Similarly, whilst Options D, E and F, and to a lesser extent, Option A have increased potential to lead to environmental effects in the vicinity of Harlow, these options will do more to realise the wider sustainability benefits associated with focusing growth in the primary settlement of the sub-region.

Taken as a whole, at the HMA level, all six options exceed the OAHN for the Housing Market Area (46,100). However, through delivering a larger number of dwellings in the sub-region, Options D, E and F have most potential to deliver a broader range of housing types and tenures, promote the vitality of settlements and support infrastructure delivery.

Overall the sustainability performance of the six options will largely depend on the more detailed elements relating to the delivery of growth in the sub-region. This includes relating to the specific location of new development areas, design and layout of new development and the integration of elements such as enhancements to sustainable transport networks and green infrastructure provision

Habitat Regulations Assessment

Potential effects on the Lee Valley SPA/Ramsar, Epping Forest SAC and Wormley-Hoddesdon Park Woods SAC have been examined in detail through the HRA process undertaken with respect to the strategic spatial options. This considered: disturbance from recreational activities and urbanisation; atmospheric pollution; water abstraction; and water quality.

Atmospheric pollution

With respect to atmospheric pollution and the key issue of transport pollution affecting Epping Forest SAC, the HRA concluded that there was relatively little difference between any of the options. The HRA indicated that no option resulted in a change in nitrogen or acid deposition rate equivalent to (or even close to) 1% of the Critical Load on any road link. It was therefore possible to conclude, in line with relevant (DMRB and AQTAG) guidelines that all options would make an imperceptible or inconsequential contribution to local nitrogen and acid deposition within Epping Forest SAC. As such, it was concluded that there would be no adverse effect on the integrity of Epping Forest SAC from the options, either alone or in combination with other plans and projects (the same conclusion also applied to the other two sites). In practice, the HRA was not therefore material to the ultimate choice of option.

However, it was evident from the HRA work that, even allowing for some improvement in background air quality to 2033 from improved emissions technology, the total nitrogen deposition rates adjacent to all modelled road links would reach, or exceed, the lowest point of the currently used critical load range for Epping Forest SAC. As such, while the modelling indicated that none of the options could be 'blamed' for making a significant contribution to the future elevated nitrogen deposition rates, when all traffic is taken together there would clearly remain potential for a continued negative effect on the SAC by 2033. Therefore, while it may not be required as 'mitigation', it is nonetheless advisable for the HMA authorities to pursue agreement on the draft *Memorandum of Understanding on Managing the impacts of growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation*, the

anticipated signatories of which include Natural England and the City of London Corporation (Conservators of Epping Forest).

Recreational pressure

In terms of recreational pressures, whilst significant effects from the options considered were not anticipated on Lee Valley SPA/Ramsar site or Wormley Hoddesdonpark Woods SAC, it was recommended that all new development deliver greenspace in line with the Natural England Accessible Natural Greenspace (ANGSt) standard to ensure it is self-sufficient. Adverse effects on Epping Forest SAC due to growth in Epping Forest District in particular could not be dismissed particularly due to development in the following settlements: Loughton, Epping, Waltham Abbey, Theydon Bois and Chigwell. More detailed visitor survey work may be required. Any such survey, and any more refined assessment of impacts and mitigation solutions would be undertaken within the scope of a strategic commitment that all the HMA authorities have made in a Memorandum of Understanding between the HMA authorities, Essex County Council, Hertfordshire County Council, Natural England and the Corporation of London. Once that survey work has been completed, strategic mitigation solutions may follow (such as access management contributions and, for the largest sites, provision of on-site alternative recreational natural greenspace).

Water abstraction and quality

In relation to water abstraction, it was concluded that the options would not result in adverse effects on the Lee Valley SPA/Ramsar site through excessive water drawdown, either alone or in combination with other plans and projects. It was also concluded that there would not be a water quality effect from the options on Lee Valley SPA/Ramsar site either alone or in combination with other projects and plans.

Strategic Site Assessment

The Harlow Strategic Site Assessment study was undertaken to: consider and evaluate potential strategic sites in and around Harlow; establish an up-to-date direction of travel in terms of the acceptability of growth; take account of high-level infrastructure implications of particular sites and in combination across Harlow; enable officers, Members, statutory consultees and land promoters to understand how the sites perform; and provide outputs capable of forming part of the evidence base for the emerging Local Plans.

The Strategic Site Assessment identified that there are sufficient suitable sites in and around Harlow to accommodate close to 16,100 units during the plan period (taking into account sites either already completed or granted planning permission as well as urban brownfield sites) provided that:

- Further detailed traffic modelling for development to the East of Harlow demonstrates growth is deliverable on the scale envisaged;
- Significant infrastructure requirements are met, including highways, sustainable travel options, education, sewerage/drainage etc.;
- Landscape impacts can be mitigated; and
- Development can be distributed amongst several sites in combination (e.g. north and west of Harlow).

4.2 The Spatial Option

In light of this investigation, the Co-op Member Board identified a preferred Spatial Option to deliver c. 51,000 new homes across the HMA to 2033 broken down as follows:

Local authority	Net new dwellings 2011-2033
East Hertfordshire District Council	c. 18,000
Epping Forest District Council	c. 11,400
Harlow District Council	c. 9,200
Uttlesford District Council	c. 12,500
Total across the HMA	c. 51,100
...of which the area in and around Harlow* will provide	c. 16,100

*'in and around Harlow' refers to development in Harlow town as well as around Harlow in adjoining districts

A breakdown of the option in comparison with the six options considered is presented in **Table 4.1** below.

Table 4.1: Preferred Spatial Option alongside the spatial distribution options considered

Spatial area		The Spatial Option ²⁷	Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
			Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ²⁸ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ²⁹)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
East Hertfordshire District								
'Givens' (up to July 2016)	Completions	2625	1951	1951	1951	1951	1951	1951
	Permissions	2435	1839	1839	1839	1839	1839	1839
	Windfall assumption	800	1120	1120	1120	1120	1120	1120
	Sub-total	5860	4910	4910	4910	4910	4910	4910
Potential allocations / broad locations ('choices')	Bishop's Stortford	4142	4321	4321	4321	3421	4321	4321
	Buntingford	0 ³⁰	496	496	496	496	496	496
	East of Stevenage	600	600	600	600	600	600	600
	East of Welwyn	1350	1350	1350	1350	1350	1350	1350
	Harlow fringe (Sites A & E)	3050	2750	1250	1250	4350	4350	4350
	Harlow fringe (Site B)	0	0	0	0	0	0	160
	Harlow fringe (Site C)	0	0	0	0	0	0	50
Harlow fringe (Site G)	0	0	0	0	0	0	900	

²⁷ The Preferred Spatial Option reflects the latest figures for completions, permissions and windfall assumptions; the options were, however, based on spring 2016 figures and the transport modelling is based on these figures

²⁸ The possibility of one of the two new settlements being located in Epping was discussed. However, Epping argued that 1616 may be potentially allocated at North Weald and this position would only be reviewed if/when aviation is found to be unviable in the longer term; no sites of sufficient size for a new settlement have been put forward in the remainder of the District and much of the east of the District is relatively rural with limited public transport connections

²⁹ Figures reduced across settlements in East Herts (Bishop's Stortford, Hertford, Sawbridgeworth and Ware) and Epping Forest to minimise Green Belt incursion; Duty to Cooperate developments at East of Stevenage and East of Welwyn unchanged

³⁰ Numbers at Buntingford are reflected in the figure for permissions (NB there is no further development planned at Buntingford for the remainder of the plan period)

Spatial area		The Spatial Option ²⁷	Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
			Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ²⁸ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ²⁹)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
	Hertford	950	950	950	950	300	950	950
	Sawbridgeworth	500	375	375	375	0	375	375
	Ware	1000 ³¹	200	200	200	0	200	1000
	Larger villages / NP ³²	500	500	500	500	500	500	500
	Other	74	337	337	337	337	337	337
	New settlement (option 1)	N/A	N/A	N/A	0	N/A	N/A	N/A
	New settlement (option 2)	N/A	N/A	N/A	1500	N/A	N/A	N/A
	New settlement (option 3)	N/A	N/A	N/A	0	N/A	N/A	N/A
	New settlement (option 4)	N/A	N/A	N/A	1500 ³³	N/A	N/A	N/A
	New settlement (option 5)	N/A	N/A	N/A	0	N/A	N/A	N/A
	New settlement (option 6)	N/A	N/A	N/A	0	N/A	N/A	N/A
Sub-total	12180	11879	10379	13379	11354	13479	15389	
East Hertfordshire District Total		18040 (OAHN = 16400)	16789 (OAHN = 16400)	15289 (OAHN = 16400)	18289 (OAHN = 16400)	16264 (OAHN = 16400)	18389 (OAHN = 16400)	20299 (OAHN = 19427)
Epping Forest								
'Givens' (up to March	Completions	1173	1007	1007	1007	1007	1007	1007
	Permissions	1250	747	747	747	747	747	747

³¹ The increase at Ware stems from further discussions since the original options were formulated with Hertfordshire County Council highways and education departments which indicate that Ware can now accommodate around 1000 dwellings (NB also reflected in Option F).

³² Allocation to include facilitation of neighbourhood planning

³³ Assume 1500 at each of two new settlements; option 2 (Little Hadham) and option 4 (Watton at Stone) are being tested under Option C for the purposes of the transport modelling

Spatial area		The Spatial Option ²⁷	Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
			Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ²⁸ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ²⁹)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
2016)	Windfall assumption	595	1394	1394	1394	1394	1394	1394
	Sub-total	3018	3148	3148	3148	3148	3148	3148
Epping Forest District part of the Harlow fringe	Latton Priory	1000	1250	1350	350	2000	2000	2250
	West Sumners	1000	1000	0	1000	1100	1100	1200
	West Katherines	1100	750	0	0	800	800	1100
	East of Harlow	750	500	0	0	1500	1500	750
	West Pinnacles	0	0	0	0	0	0	1000
	Land at Riddings Lane	50	0	0	0	0	0	50
	Sub-total	3900	3500	1350	1350	5400	5400	6350
Potential allocations / broad locations ('choices')	Chigwell	410	410	410	410	0	410	410
	Chipping Ongar	314	314	314	314	55	314	314
	Epping	513	513	513	513	413	513	513
	Loughton/Buckhurst Hill	892	892	892	892	1101	892	1101
	Theydon Bois	148	148	148	148	0	148	148
	Waltham Abbey	406	406	406	406	196	406	406
	North Weald ³⁴	1616	1616	1616	1616	0	1616	1616
Larger villages / NP ³⁵	146	146	146	146	0	146	146	

³⁴ North Weald (including the Airfield) is subject to an existing masterplan developed by Epping Forest District Council³⁵ Allocation to include facilitation of neighbourhood planning

Spatial area		The Spatial Option ²⁷	Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
			Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ²⁸ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ²⁹)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
	Sub-total	8345	7945	5795	5795	7165	9845	11004
Epping Forest District Total		11363 (OAHN = 11300)	11093 (OAHN = 11300)	8943 (OAHN = 11300)	8943 (OAHN = 11300)	10313 (OAHN = 11300)	12993 (OAHN = 11300)	14152 (OAHN = 13278)
Harlow District								
'Givens'(up to 1 April 2016)	Completions	1096	1023	1023	1023	1023	1023	1023
	Permissions	3608	3488	3488	3488	3488	3488	3488
	Windfall assumption	0	0	0	0	0	0	0
	Princess Alexandra Hospital	675³⁶	0	0	0	0	0	675
	Sub-total	5379	4511	4511	4511	4511	4511	5186
'Choices'	Urban brownfield	1196	1389	1389	1389	1389	1389	1389
	Greenfield (east of Harlow)	2600	2000	2000	2000	2000	2000	2600
	Sub-total	3796	3389	3389	3389	3389	3389	3989
Harlow District Total		9175 (OAHN = 5900)	7900 (OAHN = 5900)	7900 (OAHN = 5900)	7900 (OAHN = 5900)	7900 (OAHN = 5900)	7900 (OAHN = 5900)	9175 (OAHN = 7824)
Uttlesford District								
'Givens' (up to 1 April 2016)	Completions	2468	1914	1914	1914	1914	1914	1914
	Permissions	4598	5202	5202	5202	5202	5202	5202
	Windfall assumption	850	900	900	900	900	900	900
	Sub-total	7916	8016	8016	8016	8016	8016	8016

³⁶ On the basis that the site would be vacated during the plan period when the hospital moved to a new location (NB also included under Option F)

Spatial area		The Spatial Option ²⁷	Spatial options to deliver ~46,100 new homes across the SHMA area				Spatial option to deliver ~49,638 new homes	Spatial option to deliver ~57,400 new homes
			Option A – Each authority meets its OAHN within its own boundaries (NB ~14,150 at Harlow)	Option B – Less development at Harlow and accelerated development on the A120 (NB ~10,500 at Harlow)	Option C – Less development at Harlow and two new settlements in East Herts ²⁸ (NB ~10,500 at Harlow)	Option D – Maximum growth at Harlow (NB ~17,650 at Harlow; reduced allocations in constrained areas of the HMA ²⁹)	Option E – Higher growth across the HMA (NB ~17,650 at Harlow; allocations in constrained areas)	Option F – Maximum growth across the HMA (NB ~ 20985 at Harlow)
Potential allocations / broad locations ('choices')	Great Dunmow	750	500	500	500	500	500	750
	Saffron Walden	750	500	500	500	500	500	750
	New settlement A120 (1) ³⁷	1400	2000	4000	2000	2000	2000	1400
	New settlement A120 (2) ³⁸	1400	1000	2500	1000	1000	1000	1400
	Larger villages / NP ³⁹	200	500	500	500	250	500	200
	Other	100	0	0	0	0	0	100
	Sub-total	4600	4500	8000	4500	4250	4500	4600
Uttlesford District Total		12516 (OAHN = 12500)	12516 (OAHN = 12500)	16016 (OAHN = 12500)	12516 (OAHN = 12500)	12266 (OAHN = 12500)	12516 (OAHN = 12500)	12616 (OAHN = 14080)
Total in and around Harlow		16125 (medium - higher growth)	14150 (medium growth)	10500 (lower growth)	10500 (lower growth)	17650 (higher growth)	17650 (higher growth)	20985 (maximum growth)
Grand Total		51094 (OAHN = 46100)	48298 (OAHN = 46100)	48148 (OAHN = 46100)	47648 (OAHN = 46100)	46743 (OAHN = 46100)	51798 (CLG 2012-based household projections = 49638 ⁴⁰)	56242 (OAHN = 46100; however, latest ORS advice = 54608)

³⁷ Land at Easton Park

³⁸ Land at Boxted Wood/Andrewsfield developed jointly with Braintree (NB access through Uttlesford which might facilitate quicker delivery on the Uttlesford side)

³⁹ Allocation to include facilitation of neighbourhood planning

⁴⁰ The SHMA states "PPG identifies that the starting point for estimating housing need is the CLG 2012-based household projections. For the 22-year period 2011-33, these projections suggest an increase of 49,638 households across the West Essex and East Hertfordshire HMA: an average growth of 2,256 households each year, comprised of 779 in East Hertfordshire, 653 in Epping Forest, 326 in Harlow and 498 in Uttlesford."

The Spatial Option represents a 'hybrid' of Options A-F (**Table 4.1**). With respect to the overall quantum of c. 51,100 new homes, this reflects the furthest the authorities consider that they can reasonably go in delivering the most recent advice from ORS regarding housing need, i.e. 54,608 homes to 2033, in light of the available evidence. Critically, the figure of c. 51,100 significantly exceeds the formal OAHN of 46,100 established through the SHMA and represents strong progress towards the revised figure. The critical issue in determining the overall quantum is the level of development that can be accommodated in and around Harlow on *suitable* sites *during* the plan period. The Strategic Site Assessment (SSA) work has identified a series of sites in and around Harlow which are considered suitable or potentially suitable for development and the authorities have identified six of these in the draft *Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area*. Critically, Gilston to the north of Harlow is identified in the East Herts Local Plan for up to 10,000 dwellings in the longer-term; however, the evidence suggests that up to only ~3,000 can be accommodated in the plan period to 2033. This is one reason why other sites to the south and west of Harlow in particular are also reflected in the Spatial Option. Importantly, the transport modelling indicates that growth of between 14,000 and 17,000 new homes in and around Harlow can be accommodated provided that the mitigation measures set out in the *Memorandum of Understanding on Highways and Transport Infrastructure for the West Essex and East Hertfordshire Housing Market Area* are delivered during the plan period. The MOU emphasises the importance of developing sustainable travel corridors across Harlow and the north:south corridor, in particular, is partly predicated on development to the south of Harlow (Latton Priory). In light of the transport modelling, is not advisable to advocate more than the proposed figure of c. 16,100 in and around Harlow as significant additional transport infrastructure (perhaps in the form of a Harlow northern bypass) would likely be necessary. In the view of the HMA partners this would be incredibly challenging to deliver *over-and-above* the infrastructure improvements already sought (upgrades to Junctions 7 and 8 and a new Junction 7A). Importantly, the wider HMA beyond Harlow town is highly constrained and, in some parts very rural, and development beyond that advocated in the Spatial Option would not be desirable. While two new settlements are being explored in Uttlesford these would deliver only relatively small levels of development *during* the plan period.

4.3 Reasons for choosing the Spatial Option

In summary, the Spatial Option was identified as the most sustainable choice for the HMA on the basis that:

- At c. 51,000 new homes, the planned level of housing growth is higher than both the established OAHN within the published 2015 SHMA (46,100) and the figure based on the CLG 2012-based household projections (49,638). It is lower than ORS' estimated OAHN figure taking into account recent information including the CLG 2014-based household projections (54,608) but nonetheless represents good progress towards this higher figure. Overall, the figure of c. 51,000 indicates that the four HMA authorities are positively seeking opportunities to meet the development needs of their areas in line with the National Planning Policy Framework (NPPF) and, furthermore, significantly boosting the supply of housing (NPPF, para. 47).
- Harlow represents the most sustainable location within the HMA at which to concentrate development given its role as a sub-regional centre for employment (especially in technology); its Enterprise Zone status; the need to rejuvenate the town centre; the opportunity to capitalise on its transport connections (for example, good rail links to London, Stansted Airport and Cambridge) and deliver north-south and east-west sustainable transport corridors traversing the town; its important location on the London – Stansted – Cambridge corridor; and, above all, the wider economic growth aspirations for the town. The findings and recommendations of the London Stansted Cambridge Corridor (LSCC) Growth Commission report, published in July 2016, stated that *"Broxbourne, Harlow and Stevenage have significant strategies and ambitions for growth and development. They can play an important role in supporting the Corridor's tech and life sciences clusters. Current developments and future plans will greatly improve the industrial, commercial and residential offer. These areas must be supported to provide the*

right types of development that enhance the quality of place for the Corridor's knowledge-based industries and residents" (our emphasis).⁴¹

- The transport modelling undertaken to date demonstrates that growth of between 14,000 and 17,000 new homes in and around Harlow can be accommodated provided that the mitigation measures set out in the Highways and Transportation Infrastructure MOU are delivered during the plan period. Evidence suggests that growth beyond 2033 is likely to be possible subject to further transport modelling and the identification and delivery of additional strategic highway mitigation measures.
- The Strategic Site Assessment indicates that sufficient suitable strategic sites are available in and around Harlow to deliver the figure of c. 16,100 (together with sites either already completed or granted planning permission as well as urban brownfield sites).

⁴¹ London Stansted Cambridge Corridor Growth Commission (2016). Findings and Recommendations of the London Stansted Cambridge Corridor Growth Commission
www.lscgcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf

5 Next Steps

5.1 SAs for Local Plans in the West Essex and East Hertfordshire Housing Market Area

As highlighted in Chapter 4, the current study has, with the transport modelling, Habitat Regulations Assessment and Strategic Site Assessment informed the choice of Spatial Option for the HMA.

The work undertaken by the Co-op. Member Board to develop and test options for distributing different levels of growth across the HMA will form a critical component of the evidence base informing each of the four local plans. This work clearly demonstrates that the questions of (i) how much housing should be delivered across the HMA; and (ii) where should this housing best go have both been robustly addressed. Specifically, the authorities have agreed an overall quantum of development for the HMA as well as a housing figure for each of the four authority areas and a specific figure for the level of development to be accommodated in and around Harlow town. Beyond these agreed figures the four authorities will determine the spatial distribution of housing in their respective areas through their own local plan processes. This study provides an appropriate strategic level basis for the more localised options ('reasonable alternatives') to be explored through the Sustainability Appraisals for the Local Plans for East Hertfordshire, Epping Forest, Harlow and Uttlesford.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 13 OCTOBER 2016

REPORT BY THE LEADER OF THE COUNCIL

EAST HERTS DISTRICT PLAN: INTERIM DUTY TO CO-OPERATE COMPLIANCE STATEMENT

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents the Interim Duty to Co-operate Compliance Statement.

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL: That Council, via the Executive, be advised that:</u>

(A)	the Interim Duty to Co-operate Compliance Statement be agreed in support of the Pre-Submission District Plan.
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1.0 Background

1.1 A report to the District Planning Executive Panel on 28th November 2012 (see Background Papers) explained the background to the Duty to Co-Operate and its implications for the East Herts District Plan. The report explained that the duty required the Council, as Local Planning Authority, to engage constructively with a range of bodies throughout the plan-making process in order to address strategic cross boundary issues.

2.0 Report

2.1 A number of authorities across the country have had their Local Plans found 'unsound' at Examination in recent months on the basis that they have not adequately demonstrated that they have met the requirements of the Duty.

2.2 In order to help ensure that East Herts is able to demonstrate to an Inspector at Examination that it has met the requirements of

the Duty, a Compliance Statement is required. The Statement should identify how the Council has engaged with neighbouring authorities and other organisations throughout the plan making process in order to address strategic cross boundary issues.

2.3 This report presents an Interim Duty to Co-operate Compliance Statement in support of the Pre-Submission District Plan. It should be noted that Plan making does not finish at Pre-Submission stage and that therefore, discussions with the relevant bodies will continue over the coming months. A final version of the Compliance Statement will be prepared prior to Submission of the District Plan in March 2017.

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

District Planning Executive Panel 28th November 2012:

<http://democracy.eastherts.gov.uk/documents/s17132/Duty%20to%20Co-Operate.pdf>

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	A series of informal stakeholder discussions have been undertaken throughout the preparation of the Interim Duty to Co-operate Compliance Statement.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Pre-Submission District Plan in general will have positive impacts on health and wellbeing through a range of policy approaches that seek to create sustainable communities.

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**Interim
Duty to Co-operate
Compliance
Statement**

September 2016

1. Introduction

- 1.1 The Duty to Co-operate was introduced by the Localism Act 2011. It places a legal duty on local planning authorities to engage constructively with their neighbouring authorities and other bodies with regards to strategic cross boundary issues. National policy makes it clear that the Duty to Co-operate is not a 'duty to agree', but that every effort should be made to secure necessary co-operation before submission of a Local Plan to the Planning Inspectorate.
- 1.2 As part of a Local Plan examination, the Inspector will test whether a local planning authority has complied with the Duty to Co-operate. The Duty is separate from, but related to, the Local Plan tests of soundness. The tests of soundness, which are set out within the National Planning Policy Framework (paragraph 182), assess whether a Local Plan is:
- Positively prepared;
 - Justified;
 - Effective; and
 - Consistent with national policy.
- 1.3 In identifying whether a Local Plan is 'effective', the Inspector will assess whether effective joint working has taken place in order to address cross boundary issues.
- 1.4 This Interim Duty to Co-operate Compliance Statement seeks to support the Pre-Submission version of the East Herts District Plan by demonstrating that the requirements of the Duty have been met and that the Plan is 'effective'.
- 1.5 It should be noted that Plan making does not end at the Pre-Submission stage. The Council will continue to pro-actively co-operate with relevant bodies over the coming months. A final version of this document will therefore be completed prior to

Submission of the District Plan to the Planning Inspectorate in March 2017.

2. Co-operation with neighbouring local planning authorities and County Councils

- 2.1 This section identifies how the Council has engaged throughout the Plan making process with its neighbouring authorities. It should be noted that the Council intends to sign Memoranda of Understanding (MoU's) with all neighbouring authorities prior to Submission of the District Plan, in order to clearly demonstrate agreement on relevant cross boundary issues. All minutes from Member level Duty to Co-operate meetings with neighbouring authorities are available on the Council's website: www.eastherts.gov.uk/dutytooperate

The Co-operation for Sustainable Development Board (the Co-op Board).

- 2.2 The Co-op Board was established in 2014 as a mechanism for discussing cross boundary issues with neighbouring authorities in the East Herts/West Essex housing market area and beyond. The constituent authorities of the Co-op Board are identified below:

- The East Herts/West Essex housing market area partners (East Herts, Harlow, Uttlesford and Epping Forest Councils);
- Hertfordshire and Essex County Councils;
- Broxbourne Borough Council;
- Chelmsford City Council;
- Brentwood Borough Council
- The London Borough of Redbridge;
- The London Borough of Enfield; and
- The London Borough of Waltham Forest;

- 2.3 The Greater London Authority (GLA) has 'observer status'. Other organisations are also engaged through the Co-op Board, including the Corporation of London (Conservators of Epping

Forest), the Lee Valley Regional Park Authority and the London Stansted Cambridge Consortium (LSCC).

- 2.4 The Co-op Board is a Member level forum which is supported by a separate Officer group. The terms of reference for the Co-op Board are included within **Appendix A**.
- 2.5 The strategic cross boundary issues that have been addressed through the Co-op Board are identified below.

Housing and Economic Need

- 2.6 Joint working on planning issues in the East Herts/West Essex area has been ongoing for many years. In 2008, the Council joined with Brentwood, Broxbourne, Epping Forest, Harlow and Uttlesford Council's to form the London Commuter Belt East/M11 Sub Region partnership. The group commissioned consultants to prepare a Strategic Housing Market Assessment (SHMA) in order to assess housing needs in the local area. This study was published in January 2010, and was subsequently updated in March 2013.
- 2.7 Following the publication of national Planning Practice Guidance (PPG) in March 2014, East Herts, Epping Forest, Harlow and Uttlesford Councils commissioned the same consultants to prepare a revised SHMA. This study, which was published in September 2015, confirms that the most appropriate functional housing market area comprises the administrative areas of the four authorities. It also recommends that Broxbourne Borough is better aligned with Welwyn Hatfield.
- 2.8 In terms of housing need, the SHMA concludes that the combined level of housing need across the four local authority areas is 46,058 homes for the period 2011 - 2033. This figure has been disaggregated amongst the four authorities. For East Herts, the level of need is 745 new homes per year, or 16,390 by 2033. A Memorandum of Understanding (MoU) is under preparation which will commit all four Councils to meeting their individual housing

needs within their own administrative boundaries, including those associated with Gypsies and Travellers and Travelling Showpeople. It is intended that the MoU will form part of the final version of this Compliance Statement in due course.

- 2.9 The four authorities also commissioned consultants to prepare economic evidence in order to inform the content of the SHMA. The purpose of this work was to identify the Functional Economic Area (FEMA) and to ensure that the assessment of housing need within the SHMA adequately addressed the requirement to match homes and jobs. The study concluded that, for East Herts, between 435 and 505 new jobs will be created each year. The result of this work has been reflected both within the SHMA and the District Plan.
- 2.10 The Government released new household projections in July 2016. Further work on the SHMA has shown that, as a result of this new data, the level of housing need within the housing market area has increased to around 54,600 homes. The Council will continue to work with its partnering authorities in order to refine this work as necessary.
- 2.11 Both the SHMA and supporting Economic Evidence are available to view online here: <http://www.eastherts.gov.uk/shma>

Transport

- 2.12 Transport modelling has formed a key aspect of ongoing joint working through the Co-op Board. The modelling, known as VISUM, has been led by Essex County Council and considers the impacts of planned growth arising from the respective local plans of the four core authorities (East Herts, Harlow, Uttlesford and Epping Forest).
- 2.13 To date, the modelling has demonstrated a need to deliver a range of strategic highways measures in order to provide for 14,000 – 17,000 new homes in the Harlow area within the Plan period. A draft Transport Memorandum of Understanding (**Appendix B** to

this report) is currently being finalised by East Herts, Harlow, Epping Forest and Uttlesford District Councils, Hertfordshire and Essex County Councils and Highways England. The MoU identifies the required mitigation measures and commits the signatories to working together to deliver the schemes during the Plan period.

- 2.14 Further transport modelling will be required as work on respective local plans progresses.

Harlow Strategic Sites Assessment

- 2.15 The Harlow Strategic Sites Assessment is a study jointly commissioned by East Herts, Epping Forest and Harlow Councils in order to assess the potential suitability of sites on the periphery of Harlow. The study was undertaken in recognition that the area around Harlow provides an opportunity to meet a significant proportion of the housing needs within the housing market area.
- 2.16 Based on the results of ongoing VISUM transport modelling work, the study concludes that between 14,000 and 17,000 homes (including 3,000 homes in the Gilston Area, within East Herts) could be delivered within the wider Harlow area by 2033 subject to the successful delivery of the highways mitigation measures identified within the Transport Memorandum of Understanding. It also indicates that further development is likely to be deliverable in that area following the identification of additional mitigation measures through transport modelling.
- 2.17 The study is currently ongoing. However, a Draft Harlow Strategic Sites Assessment is available to view online here:
<http://democracy.eastherts.gov.uk/documents/s36032/Draft%20Harlow%20Strategic%20Sites%20Assessment%20September%202016%20-%20ERP%20HSSA.pdf>

Harlow and Gilston Garden Town Expression of Interest

- 2.18 In March 2016, the Government published a prospectus entitled 'Locally Led Garden Villages, Town and Cities'. The document represents the Government's latest initiative to significantly increase the level of house building across the country. It invites local planning authorities to submit bids for technical and financial support in order to help facilitate the delivery of strategic sized developments within their administrative areas.
- 2.19 In response to the prospectus, East Herts, Harlow and Epping Forest Councils, with support from the Advisory Team for Large Applications (ATLAS), have submitted a joint expression of interest in relation to growth in and around Harlow. The expression of interest, which was submitted to Government in September 2016, is located within **Appendix C** to this report.

Strategic Sustainability Appraisal

- 2.20 As part of the consideration of reasonable alternatives, consultants have been commissioned by East Herts, Epping Forest, Harlow and Uttlesford District Councils in order to undertake a theoretical appraisal of how the identified need for homes could be distributed spatially regardless of local authority boundaries. To support this work, a Sustainability Appraisal style assessment is currently being undertaken. Once complete, this study will provide a strategic level basis for the more localised options being explored through the Sustainability Appraisals of each authority's local plans.

Air Quality

- 2.21 Of particular importance within the housing market area, is the potential impact of growth on Epping Forest Special Area of Conservation (SAC). As such, a draft Memorandum of Understanding has been agreed by East Herts, Harlow, Epping Forest and Uttlesford District Councils, as well as Hertfordshire

and Essex County Councils, Natural England and the Corporation of London. The MoU, which forms **Appendix D**, requires the authorities to monitor any impact on the environmental quality of the Forest, and to introduce mitigation measures where these are necessary.

Princess Alexandra Hospital

2.22 The Co-op Board has engaged with senior representatives from the Princess Alexandra Hospital in Harlow. The hospital, which is located on a highly constrained site near the town centre, faces a number of challenges in terms of ensuring that the buildings remain fit for purpose over the coming years.

2.23 In order to resolve these issues, the preferred option of the Hospital Trust is to re-locate to a new site on the edge of the town. As such, the Hospital Trust, with support from East Herts, Harlow and Epping Forest Councils, has commissioned consultants to assess the suitability of sites on the periphery of Harlow. One potential option is to re-locate the hospital to the Gilston Area, within East Herts District. Following completion of the options study, the Council will continue to engage with the Hospital Trust through the Co-op Board in order to identify the most suitable solution.

London Stansted Cambridge Consortium (LSCC)

2.24 The Councils of Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford form the LSCC Core Area. This corridor has, over the past decade or more, been the engine of UK growth with its world class industries and businesses. In order to support the aims of the LSCC, the four core Members of the Co-op Board have all resolved to include the LSCC's Strategic Vision within their respective Local Plans.

Hertfordshire County Council

- 2.25 The Council has engaged with HCC on a number of issues in relation to the District Plan including site specific transport issues as well as education and minerals and waste. Issues arising from these topic areas have been addressed through Settlement Appraisals, the Infrastructure Delivery Plan, and the District Plan itself.
- 2.26 As noted earlier in this report, the Duty to Co-operate requires local planning authorities to demonstrate how strategic cross boundary issues have been considered. One such issue is transport modelling. While the Co-op Board, led by Essex County Council, has progressed VISUM modelling to cover the eastern section of East Herts as well as west Essex, HCC is undertaking its own modelling known as COMET.
- 2.27 The purpose of COMET modelling is to consider the impacts of planned growth on the strategic highways network across the county. HCC has previously advised East Herts that the capacity of the A414 is constrained, particular as it passes through Hertford. This issue, which is explained fully within the Hertford Settlement Appraisal, has influenced the development strategy contained within the District Plan.
- 2.28 HCC will be publishing its '2050 Vision' in Autumn 2016 which will identify a long list of potential mitigation measures that may be required in order to support identified growth across Hertfordshire. East Herts will continue to engage with this process over the coming months, particularly with regards to identification and delivery of a strategic solution for Hertford, either in this plan period or beyond.

Hertfordshire Infrastructure and Planning Partnership

- 2.29 Hertfordshire Infrastructure and Planning Partnership (HIPP) is a long established working group comprising HCC and all ten District

Councils. The purpose of the Partnership is to consider county wide issues and to provide a forum for information sharing. An MoU was agreed and signed in May 2013, and subsequently updated in January 2015. The MoU identifies how the authorities will work collaboratively in order to deliver growth across the county. The Terms of Reference for the Partnership can be found in **Appendix E** to this study, while the MoU forms **Appendix F**.

Broxbourne Borough Council

- 2.30 In 2015, Broxbourne Borough Council indicated that it would be unable to meet its identified housing needs, and as such, formally asked East Herts Council and other neighbouring authorities for assistance. East Herts responded by confirming that, due to the challenging level of housing need in this District, it would be unable to provide any additional housing to meet Broxbourne's residual needs.
- 2.31 Since that time, Broxbourne has continued to give consideration to meet its full housing needs. In Summer 2016, Broxbourne Council published a revised Regulation 18 Local Plan for consultation which identified how the full housing needs of the borough could be met. The position set out in 2015 has therefore been superseded.
- 2.32 In order to support its Local Plan, Broxbourne has undertaken transport modelling work in order to understand the impact of growth on the A10, and to identify potential mitigation measures. East Herts will continue to engage in this process as necessary over the coming months.

Welwyn Hatfield Borough Council

- 2.33 Both the emerging East Herts and Welwyn Hatfield Local Plans seek to allocate land to the east of Welwyn Garden City for

strategic development. The two authorities have co-operated on this issue for a number of years at both an Officer and Member level. In order to support development in this location, joint policy wording and a concept diagram have been developed for inclusion within the respective Local Plans. An MoU is being prepared which will identify the basis for continued joint working, including masterplanning, in order to deliver development in this location. The MoU will also identify that there is an agreement in place in order to deliver a Gypsy and Traveller site as part of development in this location, either within Welwyn Hatfield or East Herts. The site will provide 15 pitches, 11 of which will help meet Welwyn Hatfield's needs, while the remaining 4 pitches will assist in meeting East Herts' needs.

2.34 Specific cross boundary issues have also been addressed in relation to education and minerals, in collaboration with HCC. With regards to education, the development within East Herts will provide a site for a secondary school which will help to meet needs arising from both authorities. The phasing of development, including the delivery of the school, is partly dependent on the timely extraction of minerals from the site. Discussions on this issue with Welwyn Hatfield, HCC and the developers are ongoing.

2.35 In addition, East Herts and Welwyn Hatfield Councils jointly commissioned consultants to undertake a Heritage Impact Assessment that considered the potential effects of development on Panshanger Park, along with suggested mitigation. This study can be viewed here: www.eastherts.gov.uk/panshangerhia

Stevenage Borough Council

2.36 The District Plan identifies a site to the east of Stevenage for the delivery of 600 homes which will help meet East Herts housing needs. The principle of development in this location has been discussed at both an Officer and Member level. As a result of

these discussions, Stevenage Council has not objected to development to the east of the town.

- 2.37 In addition, Stevenage Council submitted its Local Plan to the Planning Inspectorate in Spring 2016. The Plan seeks to meet the full housing needs arising from Stevenage Borough. An MoU has been signed by both authorities which confirms that East Herts does not object to the content of the Plan.

North Herts District Council

- 2.38 North Herts District Council has progressed a Local Plan in order to meet its full housing needs. At this stage it is not considered that there are any further cross boundary strategic issues that need to be resolved.

Uttlesford District Council

- 2.39 While both East Herts and Uttlesford Councils are fully engaged with the Co-op Board, bi-lateral Member level discussions have also taken in order to discuss specific issues.
- 2.40 Firstly, East Herts has asked Uttlesford to consider whether land adjacent to the settlement boundary of Bishop's Stortford, to the south of Beldams Lane and within Uttlesford District, could be identified for sports pitch provision associated with Herts and Essex Secondary School. At this stage Uttlesford has suggested that, while it is unlikely that they would be seeking to allocate the land for such uses, they would not object to the provision of sports pitches in that location, provided that they were also accessible for public use.
- 2.41 Secondly, East Herts has also asked Uttlesford to consider allocating land within the route of the A120, and adjacent to Birchanger Wood, for employment use. Uttlesford has suggested that the Council will consider this issue as part of their plan making process. However, they have clear evidence within their Green

Belt Review which indicates that the area of land does perform an important Green Belt function.

3 Other prescribed bodies

- 3.1 The National Planning Policy Framework identifies a number of other bodies that the Council should engage with through the Duty to Co-operate. These are identified below. Further discussions with these organisations will take place as necessary, both prior to Submission of the District Plan in March 2017, and subsequently through more detailed design work for specific sites.

Environment Agency

- 3.2 The Environment Agency (EA) submitted a number of comments to the Preferred Options draft of the District Plan. At that stage, the EA recommended that the Council's Strategic Flood Risk Assessment (SFRA) should be updated to reflect more recent data and changes to national policy. In addition, for those sites in the District Plan which are at least partially located within identified Flood Zones, the EA indicated that the updated SFRA should include a detailed 'Level 2' assessment to help provide more detail on the associated risk. The updated SFRA can be viewed online here: www.eastherts.gov.uk/sfra.

Historic England

- 3.3 Historic England (previously English Heritage) submitted a number of comments to the Preferred Options draft of the District Plan which will be considered through detailed site specific design work and the planning application process. Historic England was engaged through the Historic Impact Assessment for Panshanger Park, as detailed in paragraph 2.33.

Natural England

- 3.4 Natural England submitted a number of comments to the Preferred Options draft of the District Plan which will be considered through detailed site specific design work and the planning application process.
- 3.5 Importantly, Natural England has been fully engaged with regards to the wording of the Co-op Board MoU concerning air quality and potential impacts on Epping Forest SAC, as well as a Habitats Regulation Assessment which has been prepared in support of the District Plan.

NHS England and Clinical Commissioning Groups

- 3.6 The Council has engaged with these bodies throughout the Plan making process, including through presenting the draft development strategy to the NHS Estates Forum.
- 3.7 Ongoing engagement with these bodies will be required through further work on the Infrastructure Delivery Plan (IDP) prior to Submission of the District Plan in March 2017. In particular, the IDP will identify where extensions to existing health facilities are required. The larger strategic sites, identified within the District Plan, will deliver new facilities to support the needs of residents in those locations.
- 3.8 As detailed in paragraphs 2.21 and 2.22, the Co-op Board has engaged with Princess Alexandra Hospital in order to consider its potential re-location to land on the periphery of the town.

Civil Aviation Authority

- 3.9 The Council has not engaged directly with the Civil Aviation Authority. However, Officers have liaised with Stansted Airport through the Stansted Airport Local Authority Forum in order to consider the potential impacts of increased passenger numbers.

Homes and Communities Agency (HCA)

- 3.10 The Council has received significant support from the Advisory Team for Large Applications (ATLAS) which forms part of the HCA. In particular, ATLAS has provided impartial advice from the earliest stages of plan making with regards to the delivery of strategic developments at the Gilston Area and East of Welwyn Garden City.
- 3.11 As identified in paragraph 2.18, ATLAS has also provided significant support in relation to the Harlow and Gilston Garden Town expression of interest.

Transport for London (TfL)

- 3.12 The Council continues to engage with both TfL and Network Rail with regards to the proposed Crossrail 2 scheme. While the Council is supportive of the proposal to run Crossrail 2 to Broxbourne and possibly beyond to Harlow, the Council has objected to the potential option of terminating the line at Hertford East. It is expected that the Council will continue to have a key input into ongoing discussions over the coming months.

Office of Rail Regulation, Mayor of London and the Marine Management Organisation

- 3.13 The Council has not considered it necessary to engage with these bodies at this stage. With regards to railways, it should be noted that the Council has engaged with the relevant Train Operating Companies and Network Rail throughout the plan making process in order to discuss the way in which the railways may cater for planned growth. The need for additional capacity on the Liverpool Street line has been highlighted through several mechanisms and the four-tracking of the line between the Tottenham Hale and Broxbourne areas has been included in Network Rail's recently published Anglia Route Study, March 2016.

4 Other organisations

- 4.1 The NPPF also requires local planning authorities to engage with two other bodies, not covered by the Duty to Co-operate regulations; namely, the Local Enterprise Partnership (LEP) and Local Nature Partnership (LNP).
- 4.2 The Council has regularly liaised with the Hertfordshire LEP throughout the plan making process. In particular, a number of discussions have taken place with regards to facilitating development within the Gilston Area. The LEP has provided significant funding in order to help deliver the Little Hadham Bypass by 2019. Further discussions will be held over the coming months in order to consider how the LEP could help to deliver other critical infrastructure schemes identified in the Council's IDP.
- 4.3 The Hertfordshire Local Nature Partnership is a body that comprises representatives of various organisations including local authorities, the Hertfordshire and Middlesex Wildlife Trust, Hertfordshire Health and Wellbeing Board, Environment Agency and the National Farmers' Union. Engagement with the LNP has taken place through the Hertfordshire Infrastructure and Planning Partnership. Further discussions with this body will take place over the coming months with regards to the proposals contained within the District Plan.

Appendix A

Terms of Reference¹

Co-operation for Sustainable Development Board

October 2014

1. Aims and Objectives

(1) The Co-operation for Sustainable Development Board will support Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. It will do this by identifying and managing spatial planning issues that impact on more than one local planning area within West Essex, East Herts and the adjoining London Boroughs.²

- 1.1 Local authorities are required by law through the Duty to Cooperate to '*engage constructively, actively and on an on-going basis*' on planning matters that impact on more than one local planning area ('strategic planning matters'). The duty is further amplified in the National Planning Policy Framework (NPPF) which sets out the key 'strategic priorities' that should be addressed jointly³.
- 1.2 The Co-operation for Sustainable Development Board ('the Board') is responsible, on behalf of the core member authorities, for identifying the sustainable development issues that impact on more than one local planning area and agreeing how these should be managed (covering the whole local plan cycle from plan-making, through to delivery and monitoring). This may include evidence gathering. It is an advisory body, and any decisions resulting from its advice remain the responsibility of its constituent councils.
- 1.3 As part of this process, the Board will review cross boundary issues (strategic planning matters) being progressed through emerging local plans and constituent Local Development Frameworks documents as appropriate, and identify issues which are likely to be vulnerable in the legal tests applied under the Duty to Cooperate. In doing so it will consider the plans of local planning authorities outside the core membership where these are likely to impact upon more than one member authority.⁴

¹ These initial terms of reference are expected to be reviewed and updated at the start of each municipal year.

² The core constituent administrative areas are identified as Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield.

³ 'Strategic priorities' that local planning authorities have a duty to cooperate on are defined in Paragraph 156 of the National Planning Policy Framework (NPPF).

⁴ Initial identification of cross boundary issues will arise from the NPPF, NPPG and from issues identified at member workshops in 2014, but are expected to change as new issues arise.

(2) The Board will support better integration and alignment of strategic spatial and investment priorities in West Essex, East Herts and adjoining London boroughs, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

- 1.4 In order to support the economic growth points within the area and investor confidence, recognising the different attributes and contributions made by the individual member councils, the Board will work jointly with the Local Economic Partnerships identified in Section 4 to understand long term investment priorities and ensure that these are aligned with other public and private sector investment plans.
- 1.5 Initially the Board will seek to understand work that is already underway which is relevant to the Board's strategic planning role.

2. Membership and Accountabilities

- 2.1 The Board provides a forum for local authorities to manage issues that impact on more than one local planning area, developing the necessary evidence base and ensuring wider corporate and other relevant matters are fully taken into account. Although there is a clear emphasis on reaching a common approach on key strategic approaches, the Board is an advisory body only. Any decisions on taking forward outputs from its meetings and work programme (e.g. shared views, policy approaches, evidence or research) will be the responsibility of individual local authorities and the statutory planning process.
- 2.2 Core membership of the Board will comprise representatives from Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield. The GLA will be given Observer status and will be sent minutes of meetings and invited to engage at appropriate times.

Each core member authority will be invited to contribute to the work programme and to consider strategic planning issues that impact on the wider area. Other authorities may be invited to attend on an occasional basis if an issue being considered is likely to have a significant impact on the authority's planning area. Each core member authority will be represented on the Board by the relevant holder of the Planning portfolio or Leader as appropriate, to ensure confidence of authority and commitment to resources.⁵ Officers may attend meetings in support of members.

- 2.3 Regular feedback and briefing to the constituent members' political and corporate leadership is the responsibility of member representatives, and should be used as a way of ensuring wider ownership and support for the Board's work as it progresses. There should also be appropriate liaison between the local authority representatives of both the Board and the South East, Hertfordshire, Greater Cambridge and Greater Peterborough Local Economic Partnerships, and London Enterprise Panel

⁵ Councils will identify their lead member

- 2.4 The Chairman of the Board will be appointed on a rotating basis which should be reviewed at least annually to ensure fair and equal opportunities amongst the constituent member authorities. Officers of the Chairman's authority will provide administrative and clerical support to meetings.

3. Ways of Working

- 3.1 Refer to Diagram in Annex 1 for details of initial working arrangements. The Board will agree a work programme, including steering and management arrangements for each project, on an annual basis. This could include setting up 'task and finish' groups for specific projects, either reporting directly to the Board or on a shared basis with other bodies. The Board will meet regularly, as required and its meetings will rotate between Harlow, Epping Forest DC and East Herts Councils as the most convenient locations for all. In the interests of transparency, notes of the Board's meetings will be publicly available once they have been agreed.
- 3.2 The Co-operation for Sustainable Development Officer Group will provide either direct advice or support, and/or deliver agreed projects.
- 3.3 Once the work programme has been established, good project management principles should be applied, such as risk management, particularly around political sensitivities and funding, and keeping the work programme under review to ensure that it is meeting the agreed objectives and the identified priorities remain relevant.

4. Key relationships

- 4.1 **South East Local Economic Partnership:** The Board will work closely with SELEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.2 **Hertfordshire LEP:** The Board will work closely with Hertfordshire LEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.3 **Greater Cambridge and Greater Peterborough LEP:** The Board will work closely with GCGP LEP to ensure the long term integration of strategic planning and investment priorities. The LEP plays a key support role on economic development and regeneration and is responsible for major funding streams. It is also identified in Local Planning Regulations as a body that local authorities need to take account of in meeting its 'duty to cooperate' obligations.
- 4.4 **London Enterprise Panel** – this acts as the Local Economic Partnership for London.
- 4.5 **East Herts West Essex Border Liaison Group:** this is an established forum for members from many of the core Board authorities to come together and

discuss issues of common interest several times a year. Its terms of reference specifically include reference to the duty to co-operate. Its wide membership (in terms of the number of elected members invited from the constituent authorities) means that it provides a useful forum for the Board to communicate on its activities, and receive updates on issues. The Chairman of the Board or an agreed member should report to each meeting of the EHWEBLG.

- 4.6 **London Stansted Cambridge Consortium:** this is an established partnership of public and private sector organisations, including councils, which covers the area from Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the Lee Valley and M11/A10 and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge. The principal objective of the consortium is to drive economic development and enhance quality of life in the north London – Stansted – Cambridge corridor. This means not only driving job growth through productivity and investment, but more importantly increasing economic activity, by ensuring local communities access employment opportunities.
- 4.7 **Other Key Partners:** A number of key bodies and organisations will be necessary to support the work of the Board either through direct support/advice or through joint projects. Most of these will be subject to the legal requirements of the 'duty to cooperate' and may well already be involved in the other partnerships mentioned above. Key bodies include the Lee Valley Regional Park, the Corporation of the City of London (responsible for Epping Forest), the Environment Agency, Highways Agency, and Homes and Communities Agency. Private sector infrastructure providers, particularly utility companies, will also be key partners particularly in terms of ensuring alignment between investment plans and priorities.

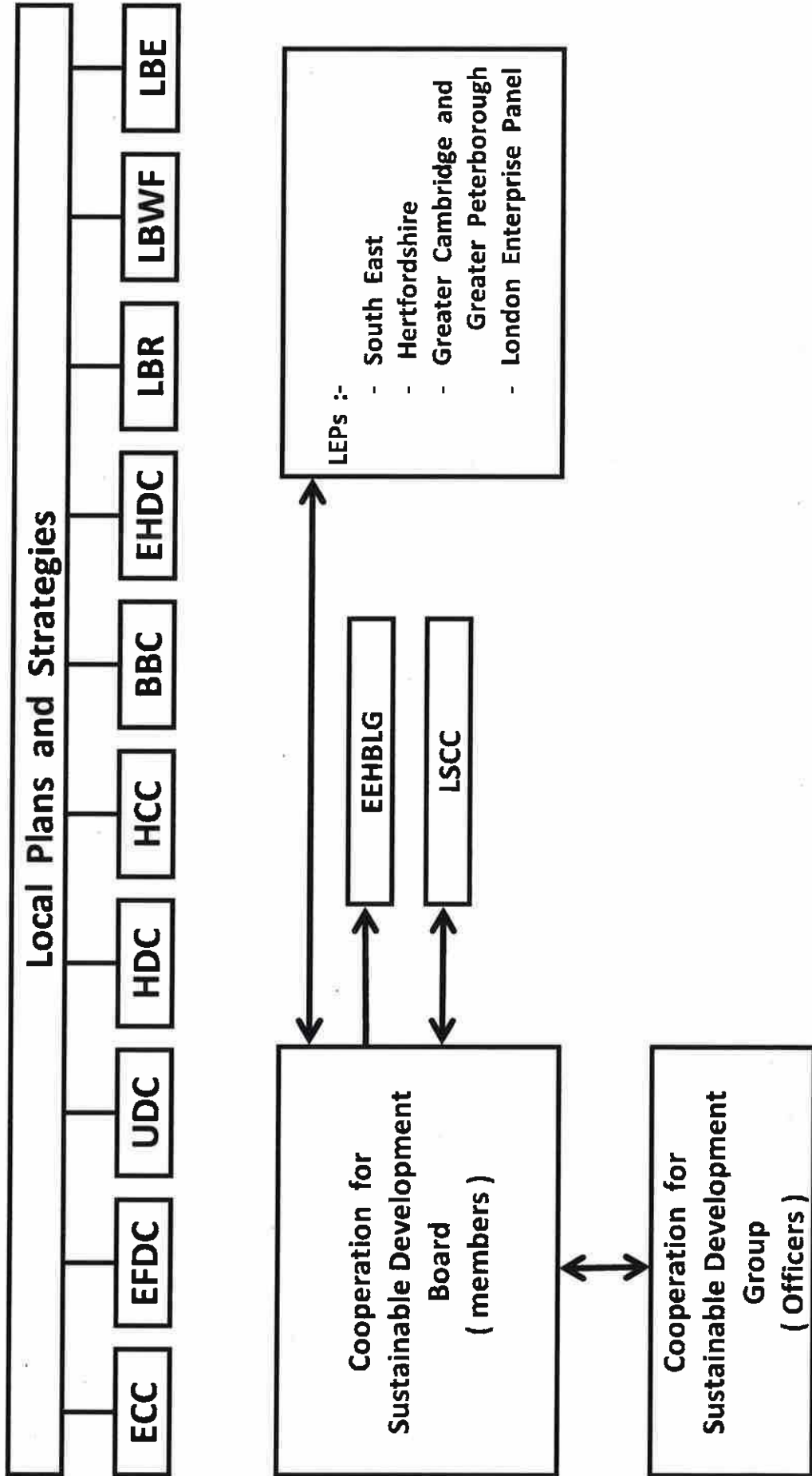
5 Technical Support

- 5.1 The Board will be supported by an officer group, known as the Co-operation for Sustainable Development Group, with representatives from each of the constituent authorities. The group will advise the Board on technical issues, and act as a steering group for any identified project, establishing suitable technical support and project management arrangements for each. This may involve the use of 'task and finish' groups and could include the use of external expertise e.g. from key statutory bodies identified in Section 4 above or the use of consultants. The group will therefore also be responsible for any necessary joint procurement arrangements.
- 5.2 A representative of the officer group (the chairman or a suitable substitute) will attend the Board meetings and provide regular progress updates on the work programme to the Chairman.

6. Review

- 6.1 These are initial terms of reference, and will be formally reviewed before May 2015. It is important to keep arrangements flexible to respond to changes in planning policy, priorities and work programmes and to move forward from plan policy development stages to implementation. It is therefore anticipated that the terms of reference will continue to be reviewed annually.

ANNEX 1



Appendix B

Draft

**Memorandum of Understanding on
Highways & Transportation Infrastructure
for the West Essex/East Hertfordshire
Housing Market Area**

between

Essex County Council
Hertfordshire County Council
Highways England

East Hertfordshire District Council
Epping Forest District Council
Harlow District Council
Uttlesford District Council

September 2016



Essex County Council



Uttlesford
District Council

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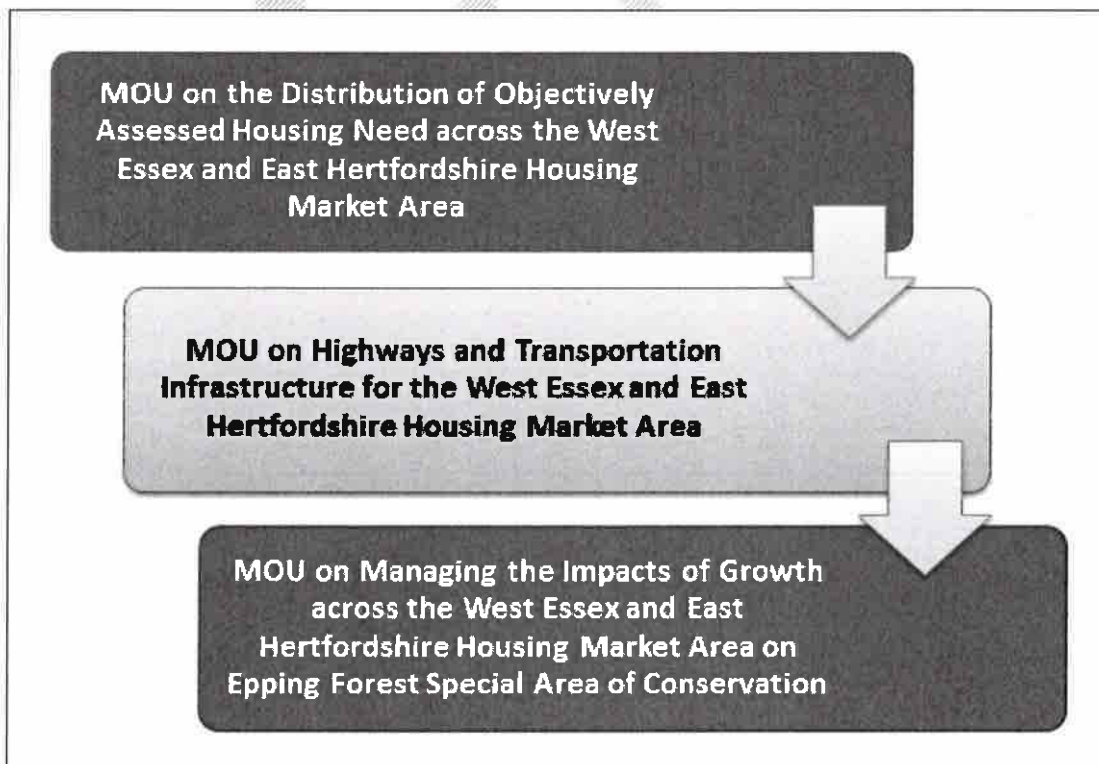
1 Background

- 1.1 Local Plans set out policies to guide development in a locality, including policies and proposals for specific sites to meet the housing, employment, environmental and social needs of the area. The suitability of sites for any of these uses depends on several factors, including transport matters such as local traffic flow, road and transport connections, and options for sustainable travel.
- 1.2 The preparation of Local Plans provides an opportunity to support a pattern of development that minimises the need for travel, minimises journey lengths, encourages sustainable travel, and promotes accessibility for all. This can contribute to the achievement of environmental objectives and reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.
- 1.3 East Hertfordshire DC, Epping Forest DC, Harlow DC and Uttlesford DC (also referred to as the 'West Essex/East Hertfordshire authorities' in this Memorandum of Understanding (MoU)) have a substantial history of co-ordinated working on strategic planning issues such as assessing housing need and planning for future growth. Essex County Council and Hertfordshire County Council have also been involved in cross-border working with the authorities for many years on many different topics including transport matters related to Local Plans.

The three inter-related Memoranda of Understanding

- 1.4 This MoU is one of a group of three related memoranda of understanding. The other two deal with the distribution of Objectively Assessed Housing Need (OAHN) across the West Essex/East Hertfordshire Housing Market Area (HMA), and managing the impacts of growth across the HMA on the Epping Forest Special Area of Conservation, as shown in Figure 1.

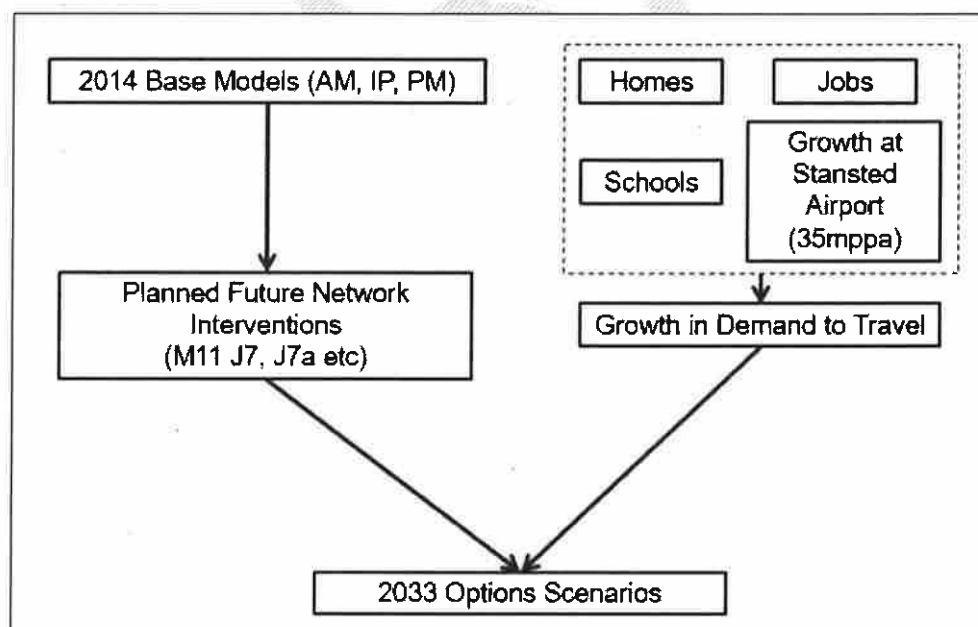
Figure 1 – Inter-related Memoranda of Understanding



Transport modelling relating to Strategic OAHN Spatial Options study

- 1.5 In conjunction with the West Essex/East Hertfordshire authorities, Essex County Council, Hertfordshire County Council and Highways England been involved in the Strategic OAHN Spatial Options study, which sets out the options for how the housing need identified in the West Essex/East Hertfordshire SHMA (2015 – and also emerging data indicating how the OAHN might change) could be distributed across the housing market area, based on an analysis of the existing/emerging policy context and evidence base.
- 1.6 One of the key ways in which the range of potential OAHN spatial distribution options were analysed was through strategic transport modelling carried out by Essex County Council, which was designed to assess the varying impacts to traffic and transportation. (This transport modelling is high-level in nature, and will be supplemented by district-wide modelling for the four West Essex/East Hertfordshire Local Plans when considering local-level issues).
- 1.7 This strategic highway modelling was carried out using Essex County Council's Visum model, which was agreed by Highways England in 2016.
- 1.8 The assumptions within the strategic highway modelling, as the baseline, are that the following will take place -
- planned improvements to M11 junction 7;
 - planned short-term improvements at M11 junction 8;
 - implementation of a new J7A on the M11;
 - A120 Little Hadham Bypass;
 - Public Health England moves to Harlow town (as announced by government);
 - London Stansted Airport growth reaches 35 million passengers per annum; and
 - TEMPRO¹ growth outside the West Essex/East Hertfordshire Housing Market Area.
- 1.9 The overall process for the highway modelling is shown in figure 2.

Figure 2 – Overview of Forecasting Process for the Highway Modelling:



¹ TEMPRO (Trip End Model Presentation Program) is the industry standard transport planning software tool for estimating traffic growth, which is required when assessing the traffic impact of a development on the local highway network.

- 1.10 The strategic highway modelling assessed five OAHN spatial distribution options A to E, for the Housing Market Area, which were as detailed in Appendix 1. Please also refer to the overarching 'Distribution of Objectively Assessed Housing Need across the West Essex and East Hertfordshire Housing Market Area' MoU for more details of the five options A to E. Option A1 was a variation to Option A, having a different spatial distribution around Harlow.
- 1.11 Following discussions with managers at Princess Alexandra Hospital (Harlow), and between the West Essex/East Hertfordshire officers, population data was explored to consider the effects on catchment area of a new hospital site either at Gilston (in East Hertfordshire District) or near a new junction 7A on the M11 (in Epping Forest District), as Princess Alexandra Hospital wishes to relocate.
- 1.12 The strategic highway modelling identified percentage traffic flow changes resulting from the Options A to E, and A1. Whilst all of the Options A to C including A1 are predicted to cause broadly similar increases in congestion and commensurate reductions in average vehicle speeds, with the higher growth (in and around Harlow) options D & E these approach 20% greater reductions in average vehicle speeds. In addition the higher growth options D & E both showed significant stress in specific areas of the network and are not recommended to be taken forward in transport terms, unless further major interventions were to be delivered during the Plan period (2011-2033). However more detailed assessment work is ongoing.
- 1.13 It should be noted that these model results are early indications based on initial forecast modelling, and there will of course be further modelling and sensitivity testing as work progresses on the four West Essex/East Hertfordshire Local Plans.
- 1.14 Since undertaking this analysis two additional spatial options have been identified. The first of these, 'Option F', aims to meet the maximum growth across the HMA. The second is the 'Spatial Option' which reflects the latest figures for completions, permissions and windfalls, and is based on spring 2016 household and population projections. It takes into account feedback from the initial highway modelling processes. It is the view of the Co-operation for Sustainable Development Officer Group that this is the most appropriate spatial option.
- 1.15 The strategic highway modelling thus played a key role in the recommendation and selection of the 'Spatial Option' to deliver the OAHN, which is as follows.

Figure 3 – The 'Spatial Option' of OAHN 2011-2033

Local authority	Net new dwellings 2011-2033
East Hertfordshire District Council	~ 18,000
Epping Forest District Council	~ 11,400
Harlow District Council	~ 9,200
Uttlesford District Council	~ 12,500
Total across the HMA	~ 51,100
...of which the area in and around Harlow* will provide	~ 16,100

**'in and around Harlow' refers to Harlow town as well as around Harlow in adjoining districts*

2 Purpose of this Memorandum of Understanding

- 2.1 This Highways and Transportation Infrastructure MoU confirms the collaborative working arrangements that exist between the three highway authorities of Highways England, Essex County Council and Hertfordshire County Council.
- 2.2 The purpose of this MoU is to ensure that Essex County Council, Hertfordshire County Council and Highways England (supported by the West Essex/East Hertfordshire authorities), together fulfil the following requirements:
1. to contribute to the delivery of the vision set out in section 3 of this MoU;
 2. to seek/support/work towards addressing the strategic highway issues identified through modelling, and some of the emerging transport issues are outlined in section 4 of this MoU;
 3. to work collaboratively to identify, develop and secure/deliver enabling highway infrastructure schemes supporting the 'Spatial Option' of the Objectively Assessed Housing Need within the West Essex/East Hertfordshire Housing Market Area, as set out above and within the overarching 'Distribution of Objectively Assessed Housing Need across the West Essex and East Hertfordshire Housing Market Area' MoU;
 4. to continue to engage with the West Essex/East Hertfordshire Councils (primarily through the Co-operation for Sustainable Development Officer Group and the Co-operation for Sustainable Development Member Board) at an early stage, in detail, and on a continuing basis, with the intention of avoiding possible objections being made at consultation stages and/or at Independent Examination of the individual Local Plans;
 5. to continue to co-operate during the implementation and monitoring of the individual West Essex/East Hertfordshire Councils Local Plans;
 6. to liaise with each other on any future joint evidence work which may be required to address the strategic highway issues;
 7. to help demonstrate compliance with the Duty to Co-operate during the Independent Examination of the West Essex/East Hertfordshire authorities' Local Plans
 8. to inform and support the 'Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation' MoU (see Figure 1).
- 2.3 This MoU specifically covers the area directly affected/impacted by the growth in and around Harlow and is NOT intended to cover the whole of the HMA, with specific district level interventions being identified by each district individually.
- 2.4 The schemes identified within this MoU are those major strategic schemes which would be required to meet the level of growth being proposed within and around the Harlow area. It does not include specific site level interventions, many of which may still be significant in themselves.

3 Vision

- 3.1 The three highway authorities are committed to co-operating with the planning authorities for the West Essex/East Hertfordshire HMA to enable sustainable communities by providing a better understanding of key highways infrastructure, including public transport and sustainable modes, that will be required to support those developments.
- 3.2 We recognise that we have a responsibility to support and develop a more coordinated approach to planning on the strategic and local highway networks to provide sustainable communities.
- 3.3 All parties are fully committed to jointly working together to resolve key highway and transportation issues, primarily those outlined in section 4 of this MoU, but also any further issues which come to light in future.

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4 Emerging key highway issues

4.1 While the following primarily focus on highways related infrastructure, the overall impact of the infrastructure also seeks to address rail and aviation issues indirectly through provision of improved access

Highways England Network Improvements (M11)

M11 Junction 7/7A

4.2 M11 Junction 7 serves as the main point of access to the strategic road network for the town of Harlow and the surrounding areas. The interchange is nearing capacity, which is constraining access to and from the M11. This in turn is constraining Harlow's growth opportunities. Highways England and Essex County Council are investigating solutions and are working together to develop improvements to Junction 7 and proposals for a new Junction 7A. For further details of the particular issues regarding Junction 7 and 7A, please see Appendix 2.

4.3 The following actions relating to these junctions are already complete:

Figure 4 – Completed actions relating to M11 Junction 7/7A

Completed Actions
Funding for improvements to Junction 7 has been obtained under Road Investment Strategy 1 (RIS1)
Essex County Council has completed four years of work on investigating options to improve Harlow's road network. A strategic options appraisal showed that the new junction 7A on the M11 is optimum solution to overcome the problems.
Essex County Council ran public consultation on the location and design of the new Junction 7A (together with widening of Gilden Way) in summer 2016

4.4 The signatories to this MoU recognise that the following actions will be necessary with regard to Junction 7/7A:

Figure 5 – Future actions relating to M11 Junction 7/7A

Action	Responsible authority
Essex County Council will announce the preferred route for J7A, by Autumn 2016	Essex County Council
Essex County Council will aim to submit a planning application for Junction 7A by Winter 2016/17	Essex County Council
West Essex/East Hertfordshire District Councils will provide support for J7A within their Local Plans, as appropriate to their area and support will be written into Local Plans which will go out to consultation in Autumn/Winter 2016	West Essex/East Hertfordshire District Councils
Highways England will continue to develop the RIS1 proposals for improvements to Junction 7	Highways England

Action	Responsible authority
RIS1 to support delivery of M11 7A before M11 J7 but will revert back to 7 if 7A isn't confirmed	Essex County Council/Highways England
Highways England will continue to provide on-going support and advice through the Co-op. Officer Group and Member Board on how best to achieve funding for J7A	Highways England / Essex County Council
Funding towards the delivery of M11 J7 and/or J7A will be sought from developers	Harlow/Epping Forest/Uttlesford and East Hertfordshire District Councils

M11 Junction 8

- 4.5 M11 Junction 8 serves as the main point of access to the strategic road network for the town of Bishop's Stortford and its surrounding area, as well as London Stansted Airport. It also provides access to the A120 and the B1256, which provides an alternative access to the strategic road network for Uttlesford District.
- 4.6 Short to medium term proposals to increase capacity through the interchange have been identified and are expected to commence in 2018. Longer term significant improvements will be needed at Junction 8 to support local growth and the expansion of London Stansted Airport. For further details of the particular issues regarding Junction 8 please see Appendix 3.
- 4.7 The following actions relating to Junction 8 are already complete:

Figure 6 – Completed actions relating to M11 Junction 8

Completed Actions
Essex County Council has identified short to medium term improvements at Junction 8.
£1,000,000 has been secured from the Greater Cambridge Greater Peterborough Local Enterprise Partnership to help fund the short to medium term improvements at Junction 8.
Essex County Council has submitted to Highways England a bid for funding for a strategic intervention at Junction 8 to Road Investment Strategy 2 (RIS2).
Essex County Council has submitted a bid to Highways England's Growth and Housing Fund (GHF) for the short to medium term improvements at Junction 8 (this bid is successfully through the first assessment stage)
Essex County Council has submitted a bid for Local Growth Fund round 3 funding to the South East Local Enterprise Partnership (SELEP) for the short to medium term scheme (this bid is successfully through the first assessment stage)

- 4.8 The signatories to this MoU recognise that the following actions will be necessary with regard to Junction 8:

Figure 7 – Future actions relating to M11 Junction 8

Action	Responsible authority
Essex County Council to continue to work with all relevant funding bodies to secure the funding of the short to medium term improvements at Junction 8 during 2016/17	Essex County Council

Action	Responsible authority
The delivery of identified short to medium term improvements at Junction 8 will be constructed in approximately 2018/19	Highways England / Essex County Council
Funding for a strategic intervention for Junction 8 with enhanced junction design will be pursued via RIS2, and through contributions from developers	Highways England / Essex County Council/Hertfordshire County Council/East Hertfordshire and Uttlesford District Councils
Strategic intervention to Junction 8 will be delivered within the Local Plan period	Highways England / Essex County Council

County Highway and Transportation Network Improvements

4.9 As well as the strategic improvements outlined above, the modelling work identified some key routes on which improvements would be required across all tested scenarios. These include the following:

- A414 corridor through Harlow (sections not currently either being upgraded or programmed for upgrading);
- A414 The provision of a second River Stort crossing to relieve the Harlow network and also help provide capacity for the provision of a north/south Sustainable Transport Corridor;
- A414 west of Harlow - Amwell Junction with the A10;
- Harlow A1025 Second Avenue Corridor (A414 to Velizy Avenue);
- Relocation of Princess Alexandra Hospital (site to be confirmed);
- A120 around Bishop's Stortford – With any long term intervention at M11 junction 8 consideration will need to be given to the impact on the A120 around Bishop's Stortford as to whether intervention(s) over and above that already agreed to facilitate development are required; and
- There will be a need to assess the impact that strategic interventions on the M11 junctions 7, and 8, and the implementation of the new junction 7A, will have on the Bishop's Stortford and Sawbridgeworth local highway network.

4.10 The A414 through Harlow to the A10 should be considered moving forward as part of an overall approach to the A414 corridor between the M11 and A1 with the Highway Authorities of Essex and Hertfordshire working together to provide the optimum outcome for both authorities.

Figure 8 – Future actions relating to County Highway & Transportation Network

Key Issue	Likelihood of identifying solution	Deliverability Issues	Phasing (years)*	Responsibility
A414 Corridor	High	Funded by developers	6 -10	East Hertfordshire DC Essex CC Harlow DC Hertfordshire CC
A1025 Second Avenue, Harlow	High	Funded by developers	6 -10	Essex CC Epping Forest DC Harlow DC

Key Issue	Likelihood of identifying solution	Deliverability Issues	Phasing (years)*	Responsibility
Second River Stort Crossing	High	Funded by developers	6 -10	Hertfordshire CC East Hertfordshire DC Essex CC Harlow DC
Multi-modal sustainable corridor, north-south through Harlow town	High	Funded by developers	6 -10	East Hertfordshire DC Epping Forest DC Essex CC Harlow DC Hertfordshire CC
Multi-modal sustainable corridor, east-west through Harlow town	High	Funded by developers	6 -10	Epping Forest DC Essex CC Harlow DC
Abercrombie Way/Third Avenue	High	Funded by developers	6 -10	Epping Forest DC Essex CC Harlow DC
A414 Amwell Junction with the A10	High	Funded by developers	6 -10	East Hertfordshire DC Hertfordshire CC
A120 Bishop's Stortford – B1383 Stansted Road Roundabout	High	Funding already in place	0 - 5	Hertfordshire CC Essex CC

**indicative timescale dependent on how developments come forward during the plan period*

Future Co-operation and Planning

- 4.11 It will be necessary to monitor the impacts of both the Highways England and County Network Schemes as these are delivered. This is crucial for planning for future interventions beyond the plan period. Due to the long timescales associated with major scheme delivery it is important that this work continues throughout the plan period to 2033, so that future growth in the next plan period can be coordinated and accommodated without delays while the planning and delivery of infrastructure is secured.

5 Securing funding

- 5.1 There are a number of different funding sources available to deliver the various key pieces of infrastructure identified within the MoU, which include Section 106 agreements or Community Infrastructure Levy (CIL - but with S106 being the key contributor to major schemes), Section 278 agreements, government funding streams administered through South East LEP, Hertfordshire LEP, RIS2 and subsequent funding periods, together with other funding opportunities as these arise.
- 5.2 There is a clear distinction between the national infrastructure requirements and the local and county infrastructure requirements which have been identified. Significant funding would be expected through national funding streams for the major pieces of infrastructure, such as the long term solution at M11 J8. However, this would not, and should not, preclude contributions, sometimes major contributions, from developers through S106 towards these schemes. Delivery of the county schemes identified as being required to deliver the levels of growth in the OAHN would be expected to be primarily, or totally, funded by developers through Section 106 or similar contributions, although other funding sources as identified above could provide for the delivery of these schemes in part or in total as necessary.

6 Timing

- 6.1 This Memorandum of Understanding has immediate effect and will remain in place until adoption of the last of the West Essex/East Hertfordshire authorities' Local Plans and all identified schemes have been delivered as required, unless this MOU is reviewed and replaced before this. This document will be kept under review. It is based on the most up to date evidence available at the time of writing.

7 Key contact details

7.1 The primary contacts for this Memorandum of Understanding are as follows.

Figure 9 – Key officer contacts

Organisation	Contact name and email address
Essex County Council:	David Sprunt david.sprunt@essex.gov.uk
Hertfordshire County Council:	Roger Flowerday roger.flowerday@hertfordshire.gov.uk
Highways England:	Andy Jobling andy.jobling@highwaysengland.co.uk
East Hertfordshire District Council	Claire Sime Claire.sime@eastherts.gov.uk
Epping Forest District Council	Amanda Thorn AThorn@eppingforestdc.gov.uk
Harlow District Council	Paul MacBride Paul.Macbride@harlow.gov.uk
Uttlesford District Council	Alan Gilham AGilham@uttlesford.gov.uk

8 Signatures and seals

8.1 This Memorandum of Understanding is signed by and duly authorised for and on behalf of:

Essex County Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

Hertfordshire County Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

Highways England

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

East Hertfordshire District Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

Epping Forest District Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

Harlow District Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

Uttlesford District Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

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Appendix 1 - Options tested within the Strategic Highway Modelling

A1.1 The strategic highway modelling assessed the six OAHN spatial distribution options for the Housing Market Area, which were as follows.

Figure 10 – ‘Reasonable Alternatives’ in the Strategic OAHN Spatial Options study

Option	Details of this option	<u>Rough</u> total dwelling number for option (source of number)	<u>Total dwellings to be delivered</u> across the HMA 2011-2033
A	Each authority meets its OAHN within its own boundaries	46,100 (2015 SHMA)	48,298 of which 14,150 in wider Harlow area
B	Less development at Harlow and accelerated development on the A120	46,100 (2015 SHMA)	48,148 of which 10,500 in wider Harlow area
C	Less development at Harlow and two new settlements in East Hertfordshire	46,100 (2015 SHMA)	47,648 of which 10,500 in wider Harlow area
D	Maximum growth at Harlow, with reduced allocations in constrained areas of the HMA	46,100 (2015 SHMA)	46,743 of which 17,650 in wider Harlow area
E	Higher growth across the HMA, with allocations in constrained areas	49,638 (2012-based household projections)	51,798 of which 17,650 in wider Harlow area
A1	Variation to option A removing Katherines, reducing Harlow East and adding more to Harlow South	46,100 (2015 SHMA)	48,298 of which 14,150 in and around Harlow

Figure 11 – Additional Spatial Options, not yet fully tested

Option	Details of this option	<u>Rough</u> total dwelling number for option (source of number)	<u>Total dwellings to be delivered across the HMA 2011-2033</u>
F	Maximum growth across the HMA	roughly 54,600 [^] (emerging OAHN according to 2012-based household projections and 2014-based Sub-National Population Projections (SNPP))	57,141 of which 20,895 in wider Harlow area
The 'Spatial Option' *	Reflects latest figure for completions, permissions and windfall assumptions and is considered to be the most appropriate spatial option;	n/a	roughly 51,100 of which roughly 16,100 in and around Harlow

* See the 'Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area MoU' for more details of 'the 'Spatial Option'.

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Appendix 2 - M11 Junction 7 improvements and the new junction 7A

- A2.1 M11 Junction 7 serves as the main point of access to the strategic road network for the town of Harlow and the surrounding areas. It also provides access to the A414 (a county principal road), which connects Chelmsford (to the east) and Hertford (to the west); and the B1393 which forms a local link between the settlements of Epping and Harlow and provides access to the strategic road network for much of Epping Forest District.
- A2.2 The M11 Junction 7 interchange is nearing capacity, which is constraining access to and from the M11. This in turn is constraining Harlow town's growth opportunities. Highways England and Essex County Council are investigating solutions and are working together to develop improvements to Junction 7, and a proposal for a new Junction 7A. These solutions will deliver the best benefits within project constraints for Harlow district, and the surrounding districts, by enhancing access to the M11 and acting as an enabler for the housing and economic growth as set out in the 'Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area MoU', and in the emerging Local Plans of Harlow DC, Epping Forest DC, East Hertfordshire DC, and Uttlesford DC.
- A2.3 Highways England is developing the Road Investment Strategy Period 1 scheme: 'M11 Junction 7 junction upgrade – extra capacity on junction 7 near Harlow', which aims to reduce the current congestion around the junction. Highways England is at the very early stages of developing these proposals and once they have been refined, the scheme will go out to public consultation. Works are expected to start by 2020.
- A2.4 Essex County Council are leading on proposals to create a new junction on the M11 (7A) to the east of Harlow that will enable housing and commercial development within and around Harlow and relieve some of the pressure on the existing Junction 7 to the south. Proposals went out to public consultation in 2016. Funding is yet to be identified and all authorities have committed to promoting this scheme for funding by the future Road Investment Strategy programme.
- A2.5 Essex County Council and Highways England have formed the Essex Strategic Highway Programme Group that meets monthly and will provide guidance in helping the project teams to work collaboratively.

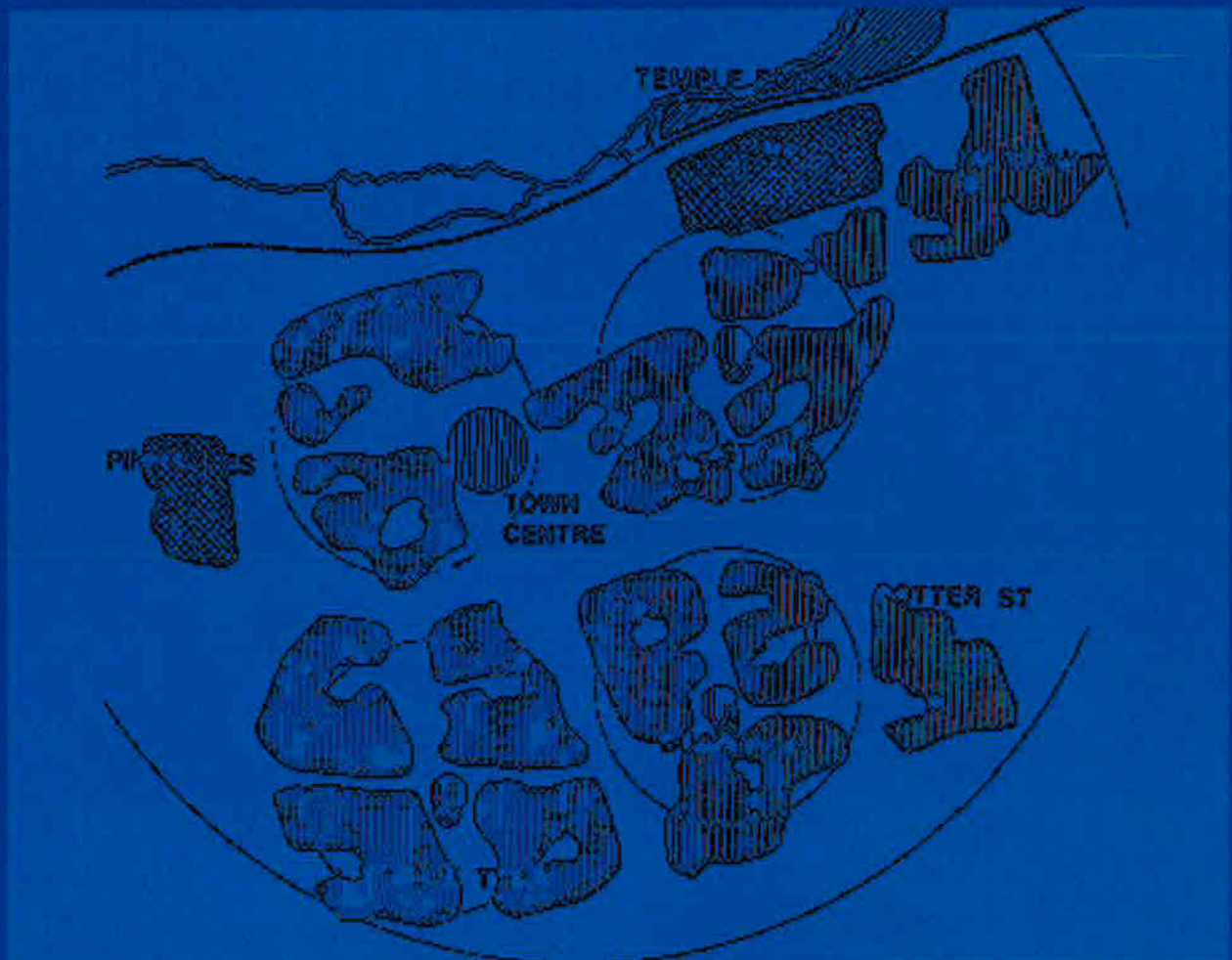
Appendix 3 - M11 Junction 8 Improvements

- A3.1 M11 Junction 8 serves as the main point of access to the strategic road network for the town of Bishop's Stortford and its surrounding area, as well as London Stansted Airport. It also provides access to the A120, an east-west route connecting Standon at the most westerly point with Harwich on the east coast; and the B1256, which provides an alternative access to the strategic road network for Uttlesford District.
- A3.2 Growth is planned both in and around Bishop's Stortford (within East Hertfordshire District) and within Uttlesford District, in addition to potential expansion of London Stansted Airport, both of which are likely to increase traffic demands at Junction 8.
- A3.3 Short to medium term proposals to increase capacity through the interchange have been identified. The Greater Cambridge Greater Peterborough Local Enterprise Partnership has secured £1,000,000 to undertake these improvements. Proposals include widening on the A120 link from Bishop's Stortford, a dedicated free flow left turn from the M11 southbound exit slip to the A120 eastbound, and widening on the M11 northbound exit slip. These proposals are estimated to cost upwards of £5,000,000; therefore, there will also need to be developer contributions. Timescales for the delivery of these proposals are still to be confirmed but are expected in 2018.
- A3.4 Longer term significant improvements will be needed at Junction 8 to support expansion of London Stansted Airport and growth identified by the West Essex/East Hertfordshire Housing Market Area. Highways England is developing the next round of Route Strategies, which will be a key building block in the Government's next Road Investment Strategy. Route Strategies bring together information from motorists, local communities, construction partners, environmental groups and across the business sector to help better understand the performance of the strategic road network, to shape investment priorities, to improve the service for road users and to support a growing economy. The evidence collected and the indicative solutions identified - along with the outcomes of the strategic studies - will be the foundation of Highways England's first 'Strategic Road Network Initial Report' to be submitted to Government in 2017.
- A3.5 Through the Route Strategies we are committed to highlighting the need for investment in Junction 8.

Appendix C

Harlow & Gilston Garden Town

Expression of Interest
September 2016



A joint response to the Government's locally-led Garden Towns prospectus on behalf of:



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A1 Wider housing needs

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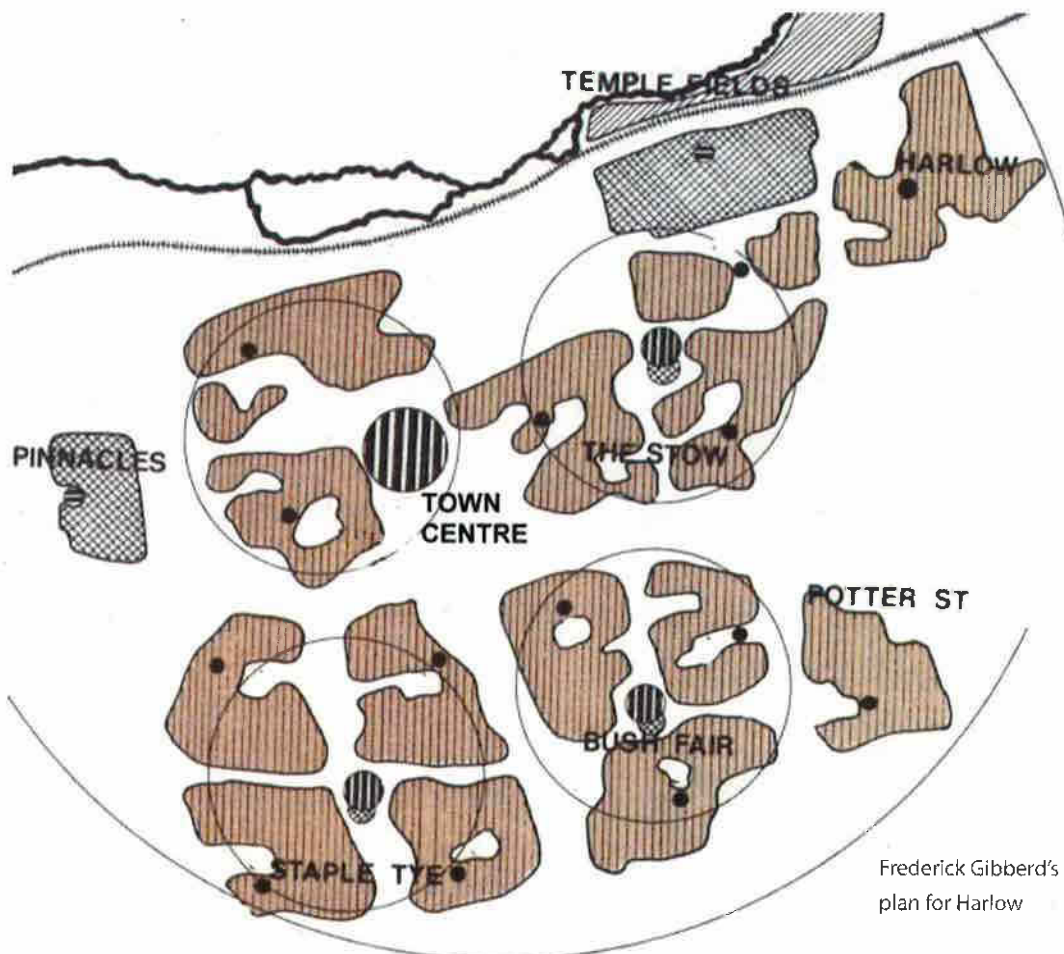
A4 Letters of support

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Frederick Gibberd's
plan for Harlow

Commitment

Harlow Council (HC), East Hertfordshire District Council (EHDC), Epping Forest District Council (EFDC), Hertfordshire County Council (HCC) and Essex County Council (ECC) ('the Councils') are working in partnership together with Hertfordshire LEP (HLEP), South East LEP, and site promoters to bring forward transformational growth at Harlow.

The Councils share a bold vision and set of objectives, recognising that areas in and around Harlow present a number of opportunities to deliver growth of considerable scale and significance. Such growth is key not only to meet growing pressures of housing need locally, but also delivering broader regeneration and change for Harlow.

We have prepared this document in response to the Locally Led Garden Villages, Towns & Cities Prospectus issued by the Department for Communities and Local Government (DCLG) in March 2016. In accordance with the requirements of the prospectus, this document provides a background to the proposals, sets out how our level of ambition fits with the various matters raised in the prospectus, and identifies what will be needed to help move forward effectively and efficiently into delivery.

We are committed to bringing forward transformational growth at Harlow, and the Councils are working collectively to establish a suitable suite of Local Plans that can guide growth going forward. Delivering at such scale is however complex and challenging, requiring a positive partnership approach. This not only involves the Councils, land owners and developers to bring proposals effectively through the planning system, but also requires a shared commitment with infrastructure providers and national Government to provide a strategic approach, enabling barriers to be overcome and opportunities to be realised.

We look forward to working with Government on this exciting new era for Harlow & Gilston, creating a new garden town, delivering transformational growth and a quality new working and living environment for future generations.

Clr Jon Clempner
Leader, Harlow DC

Clr John Philip
Planning Policy Portfolio Holder,
Epping Forest DC

Clr Linda Haysey
Leader, East Hertfordshire DC

1. Strategic context

1.1 Vision & objectives

Harlow & Gilston lies in the core area of the 'London Stansted Cambridge Corridor' (LSCC) - one of the most important and fastest growing economic regions in the country. The Councils of Broxbourne, East Hertfordshire, Epping Forest, Harlow and Uttlesford have all come together to drive forward the continued success of the corridor as a great place to live, work, do business and visit.

The LSCC vision for the core area, signed up to by all of the Councils, is to build on the areas key strengths including its skilled workforce in sectors such as health, life sciences and pharmaceuticals, advanced engineering and aerospace, its high quality environment and educational opportunities. Together with the presence of Stansted Airport, the local authorities are seeking to deliver sustainable growth to support the economic ambitions of the LSCC through:

- complementing and supporting the economic performance of the corridor whilst maintaining and enhancing the special character of the area, including the locally distinctive historic character of its market towns and rural settlements;
- the delivery of housing, supported by good access to social, leisure, community, health facilities, education and jobs, that meets the needs of local people and supports sustainable economic growth, whilst ensuring it remains an attractive place for people to live and locate to;
- capitalising on existing economic sectors and promoting growth of expanding industries including in the food production, life sciences, pharmaceuticals and technology sectors; tourism including hotels, Stansted's expansion, recreation/green assets including the Lee Valley, Stort Valley, Epping Forest and Hatfield Heath;
- working with partners to secure investment in major infrastructure including increasing rail capacity on the West Anglia Mainline and maximising the opportunities that Crossrail 2 can deliver, together with road improvements including a new junction on the M11 at 7a and improvements to junctions 7 and 8, and to the A414, A120, M25 and A10, together with delivery of superfast broadband;
- supporting the delivery of new jobs in the Harlow Enterprise Zone, and the north side of Stansted Airport, Broxbourne Park Plaza, Brookfield and Bishop's Stortford – all identified as Strategic Opportunity Sites within the corridor;
- the regeneration of existing urban areas including at Harlow, Waltham Abbey, Loughton and Waltham Cross.

Harlow provides a significant catchment of 3.3million people within an approximate one hour journey. This population is set to grow by 20% by 2032. The area has a strong economy and skills base with 41% of an expanding working age population qualified to degree level. The business base is also growing with a 2.2% increase between 2008 and 2010, despite a global recession.

Harlow Enterprise Zone: www.harlowez.org.uk

Harlow & Gilston Garden Town represents a major opportunity at the heart of the corridor with the potential to accommodate tens of thousands of homes and jobs between the global centres of London and Cambridge.

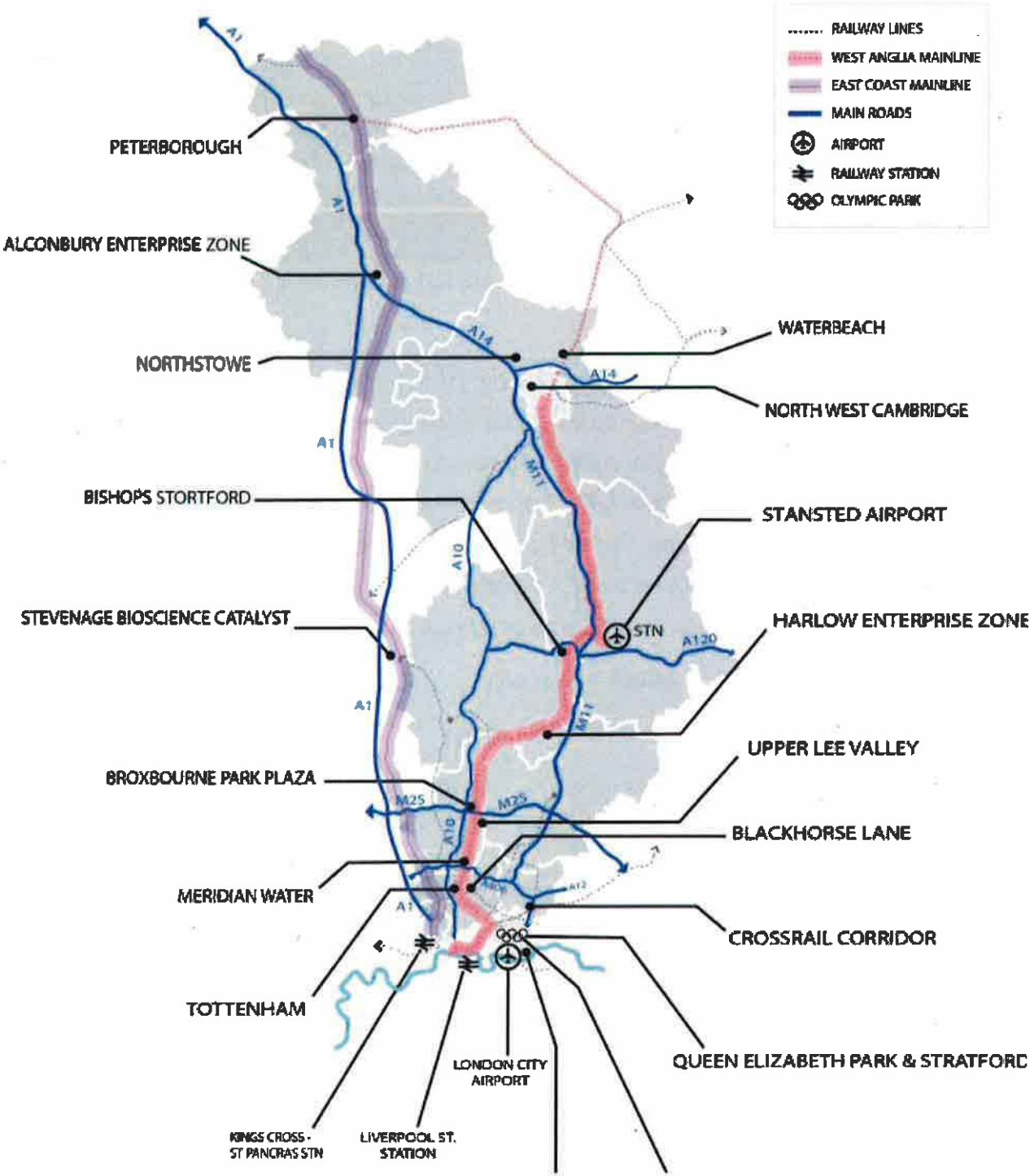


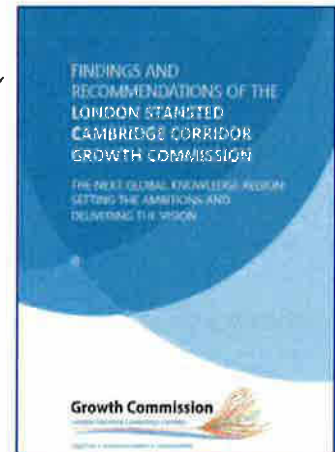
Figure 1: Opportunity sites within the LSCC



London Road South site within the Harlow Enterprise Zone, sitting adjacent to Newhall residential community

“We need to deliver quality of place to become the next global tech and life sciences region. Our ability to attract and retain talent relies on our ability to offer exciting career opportunities, host leading global firms, and provide vibrant, affordable and accessible homes and communities.”

London-Stansted-Cambridge Growth Commission



Putting in place these critical building blocks will provide the foundations for looking further ahead to 2050. Certainty through further investment and delivery of key infrastructure, including in the West Anglia mainline, Crossrail 2, the M11 junctions, M25 junctions, A10, A414 and A120 is a vital component of this. It will enable the Councils in the Core Area to focus development where it is needed, and where it can be sustainably accommodated, in order to

maximise the longer-term economic potential in a proactive way.

This will ensure that the core area plays its full role in the contribution that the corridor can make as an economic powerhouse within the UK and beyond.

1.2 The scale & impact of strategic growth

Various local studies have considered the opportunities to address the challenges facing Harlow today, and conclude with clear links between growth and regeneration outcomes.

The development of housing enables greater social mobility and provides labour for local employers, helping businesses to expand, which in turn benefits the wider local economy. The delivery of new housing at the right scale can also enable a critical mass to be reached. This means providing a sufficient number of people to sustain services, facilities and employment.

Harlow has not achieved the scale it needs to sustain the kind of infrastructure, economy or town centre from which many of its comparator towns benefit. Furthermore, it is evident from recent developments in Harlow that these have delivered jobs, homes, infrastructure investment as well as new facilities for the community.

There is an opportunity to deliver regeneration objectives through growth in order to achieve wider aspirations for economic and social prosperity, whilst also addressing housing market needs. With this in mind, the Councils have been considering alternative spatial options for growth and approaches to distributing housing across the Strategic Housing Market Area. This work has resulted in a preferred spatial option that will inform the final versions of Local Plans.

The appendix sets out the current position in relation to distribution of homes throughout the West Essex and East Hertfordshire Housing Market Area (HMA) and illustrates the scale of growth being envisaged. In advance of Local Plans being published, submitted, examined and adopted the figures may be subject to change. Nevertheless, the Councils are committed to taking forward the broad numbers highlighted.



“Tech and life sciences industries thrive in attractive places and well connected, vibrant communities.”

London-Stansted-Cambridge Growth Commission

The Councils are exploring site capacities aligned with the principles through respective Local Plans. One spatial option being explored demonstrates a transformational opportunity, with further work needed to refine and deliver the proposal.

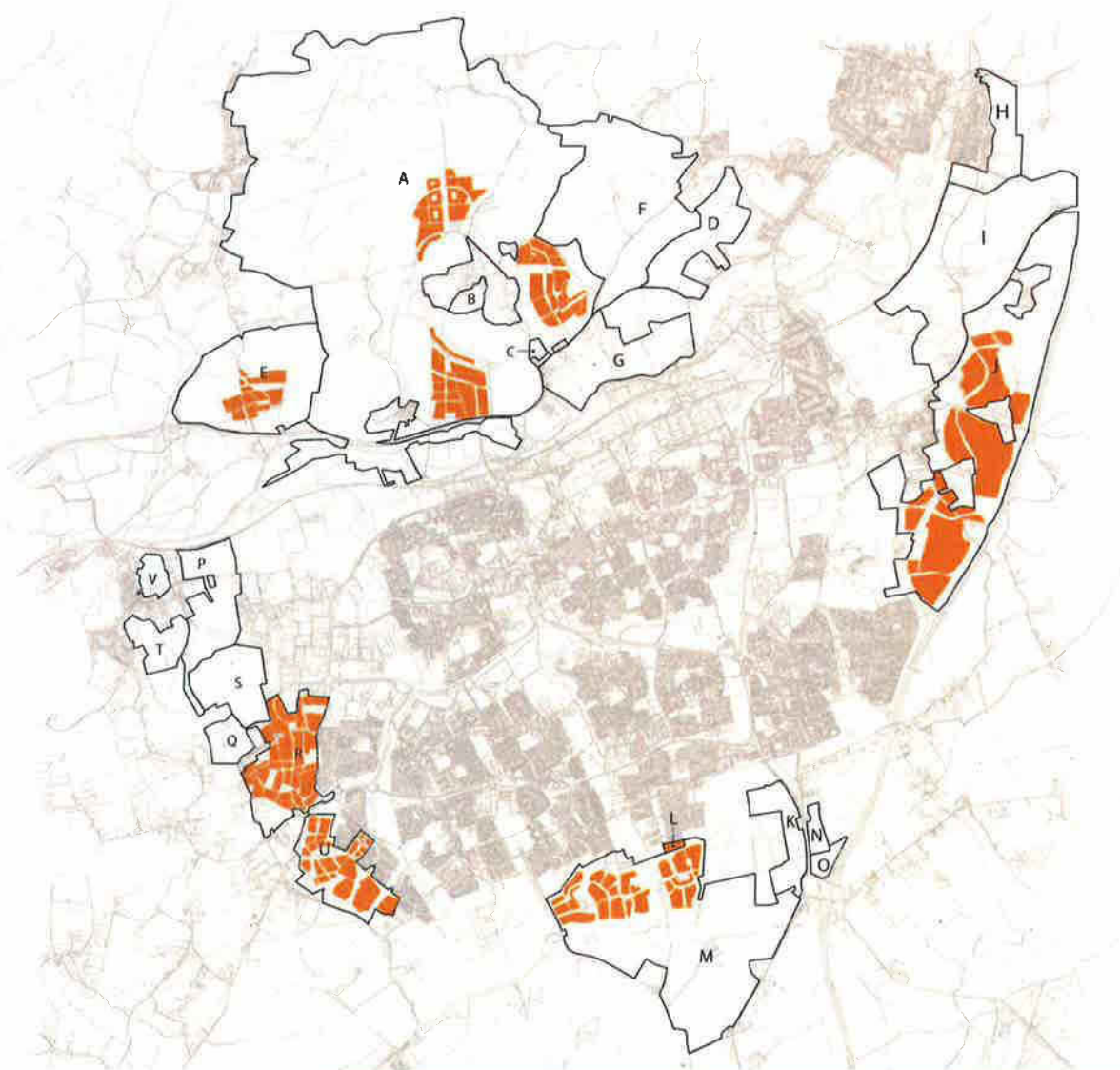


Figure 2: Indicative spatial option up to 2033

Joint working to-date has identified capacity to deliver c.16,100 homes up to 2033; Garden Town status will enable the Councils to front-load joint masterplanning work, secure place-making objectives & accelerate delivery within the first five years of the plan period.

1.3 Key issues & challenges

Delivering growth of the scale set out will be particularly challenging and require focussed effort and co-ordination to be realised. Of particular note, are the following key issues:

- enabling Harlow & Gilston to play a bigger role in contributing to the region's global tech ambitions; avoid falling behind in terms of quality of place, infrastructure, scaling-up businesses and workforce skills;
 - stakeholder coordination - due to the cross-boundary nature of growth, a large number of stakeholders will be involved requiring effective coordination and consistent approaches;
 - effective progress through planning - an efficient and effective approach will need to be found to ensure respective Local Plans can progress through the examination and adoption process; multiple plans, with elements of interdependency pose additional risk;
 - strategic infrastructure - the scale of growth has significant implications on the capacity of existing infrastructure; whilst individual developments can address their own mitigation, solutions will need to be found for strategic matters with cumulative impacts.
- These challenges are likely to be most acute in relation to:
- access to the M11 with impacts on existing junctions 7 and 8, and the need for a new Junction 7A;
 - the A414 corridor, with impacts both through Harlow but wider west along the corridor and the essential need for Stort crossing improvements;
 - water use & treatment - potential need for upgrades to Rye Meads sewage treatment works, and associated pipework;
 - healthcare - the provision of hospital space and potential relocation of Princess Alexandra Hospital;
 - viability - whilst emerging evidence indicates strategic growth should be viable, care will be needed to ensure strategic development can contribute effectively to the provision of infrastructure and wider policy requirements;
 - securing design quality in the context of viability will be key;
 - land & deliverability - the delivery of some of the sites will require collaboration between landowners.



2. Re-imagining the 21st Century Garden Town

The Councils share a commitment to further develop the guiding principles through future collaborative working; the next level of spatial work will be enshrined in a joint Garden Town Charter which will define clear design principles to guide future development.

2.1 Delivering Garden City principles

The local level of ambition is high, and there is a strong desire and commitment to achieve far more than the norm in terms of delivering growth. Strategic growth in and around Harlow is still at the stage where proposals can be guided and influenced to achieve true garden city ambitions, yet still achieve development in an efficient and timely manner. The partners understand and recognise the need to stand out from the ordinary, and support the core ethos and objectives set out in the Town & Country Planning Association's (TCPA) key guiding principles.

The Harlow & Gilston Garden Town represents an opportunity to deepen existing cross-boundary working. This will develop the spatial work to the next level by identifying clear design principles similar to charters developed elsewhere in Essex but tailored to the unique characteristics of Harlow & Gilston.

The Councils are already working towards an interpretation of the principles to fully reflect local context and place-making considerations. Part of this Expression of Interest is focussed on helping to evolve the thinking further to ensure that such ambitions can be enshrined in a joint charter and strong policy basis.

Example of a charter from elsewhere



BY 2036, THE LONDON STANSTED CAMBRIDGE CORRIDOR WILL BE...

One of the top five global knowledge regions, alongside San Francisco – Silicon Valley, Boston Route 128, and The Triangle.

- The prime location choice for tech and life sciences firms looking to locate in the UK
- The source of 10 new 'unicorns' (new firms with valuations reaching US \$1 billion or higher), three of which will be FTSE100 companies, and all of which are global technology leaders
- Home to 400,000 new jobs created since 2016, of which 200,000 will be tech, life sciences and knowledge jobs
- Leading UK productivity: with GVA per hour 20 per cent above the UK average

AS PART OF THIS WIDER VISION HARLOW & GILSTON GARDEN TOWN WILL...

Reach its full potential in contributing to the wider ambition to compete as a global tech region and to becoming a UK competitive knowledge town. Quality of place and connectivity will be fundamental to the vision for Harlow & Gilston. High quality housing development, infrastructure, and location will boost the town's attractiveness to talent and investment. This in turn will lead to increased growth, productivity and competitiveness. Tech and life sciences industries will thrive in high quality places and communities. New communities will be well connected, have great workforce skills and entrepreneurial talent. They will have a richness and diversity that acts as a magnet to global talent and investment.

The development of Harlow commenced in 1947 following its designation as a new town. The town was masterplanned by Sir Frederick Gibberd creating a strong urban identity and sense of place. Many of the guiding principles from Sir Frederick Gibberd's masterplan remain relevant today.

Harlow Council already has in place a Design Guide which sets out a series of objectives and principles providing a good fit with garden city principles. The Design Guide states that Harlow should develop as:

- A place of attractive, self-sufficient, walkable neighbourhoods;
- A place shaped by its landscape and natural setting. A green place where pedestrians have easy access to well-connected open spaces, areas of nature conservation importance and the countryside beyond;
- A place that benefits from an efficient, strategic movement network that is not solely dependent on private cars but makes provision for public transport, walking and cycling as viable choices;
- A place that is built to the highest standards of contemporary design and performance; and
- A place with attractive and distinctive neighbourhoods.



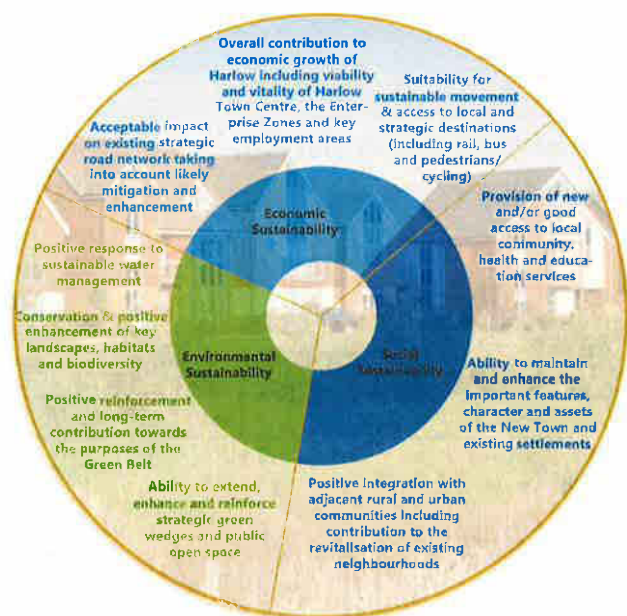
Innovative housing types at Newhall, Harlow

2.2 Joint-working

Relevant members from the Co-operation for Sustainable Development Board ('the Board', see appendix A3) have been involved in a series of workshops facilitated by ATLAS aimed at specifically considering the issue of expansion and role that strategic sites could play. The following shared objectives (see figures 3) arose from the workshops and are being considered through further technical work.

These objectives will evolve further, especially in relation to the approach to strategic sites as part of evolving masterplans and site specific design guidance for the major strategic sites. The next section identifies the initial guiding principles evolved through this work. These form the foundation for work towards a charter to transform Harlow & Gilston into a 21st Century Garden Town.

Figure 3: Sustainability wheel & shared objectives

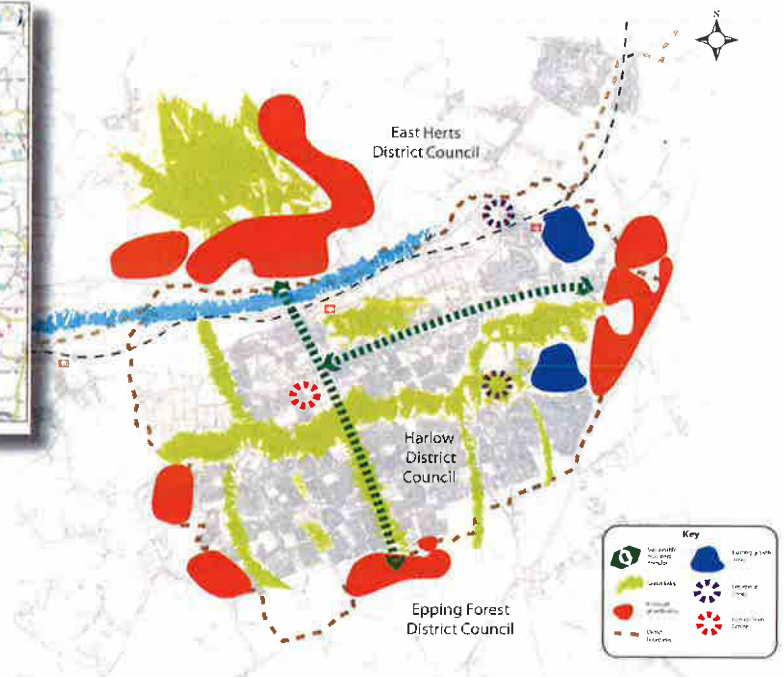


Guiding principles

The opportunity exists to extend and strengthen the existing framework of green wedges and spaces through a landscape-led approach aligned with Garden City principles. Further work is needed to refine the detail of the proposal.

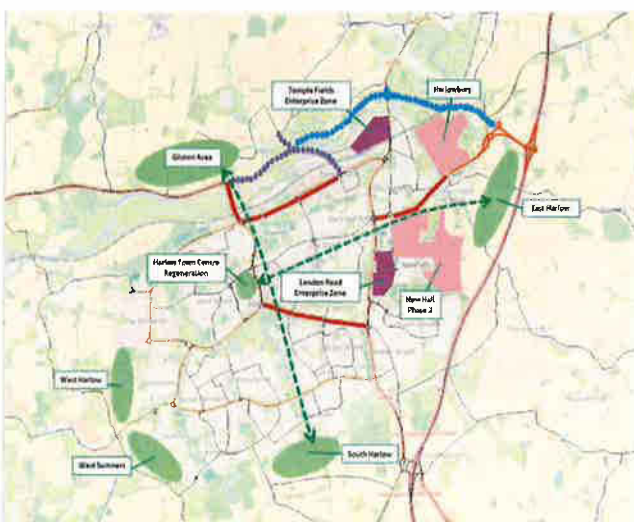


Figure 4: Harlow's existing network of Green Wedges and open spaces



Linking garden settlements & strengthening the green network

The Councils share an ambition to create sustainable travel corridors as part of managing overall travel demand and linking new communities & Enterprise Zones through a choice of transport modes.



Potential new Sustainable Transport Corridors



Sustainable transport route, Ravenswood, Ipswich

Quality of place and connectivity are at the heart of the vision to become a competitive knowledge-driven Garden Town.



Almere, Netherlands – a new town which puts walking and cycling infrastructure at the top of the hierarchy for local trips.



Stevenage, UK – a new town which has strong walking & cycling infrastructure, but it is often faster and more convenient to drive.



Northampton, UK – a new town which has retrofitted much of its cycle network. A common, uninviting sight across many UK towns & cities.

Employment growth will go hand-in-hand with placemaking. Harlow is already at the centre of a corridor that is already globally competitive in innovation and technology, but future growth depends on the place-based policies that can develop and support a high quality location for business and work.

These can play an important role in supporting the Corridor's tech and life sciences clusters. Current developments and future plans will greatly improve the industrial, commercial and residential offer. These areas must be supported to provide the right types of development that enhance the quality of place for the Corridor's knowledge-based industries and residents.

As part of this vision, the Councils recognise it is essential to provide a robust policy framework to promote and deliver a step change in sustainable travel, to manage overall travel demand.

Early delivery of a second River Stort crossing is essential to facilitate a north - south sustainable travel corridor, significant modal shift and wider network benefits to Harlow. The Councils also recognise the opportunity to create more sustainable travel-to-work patterns across Harlow further enhanced by proximity to the Enterprise Zones.

Green infrastructure combined with the development of sustainable transport corridors will form key underpinning design principles for the next stage of work, based on a strategic network of green wedges and green fingers as set out in Gibberd's original vision.

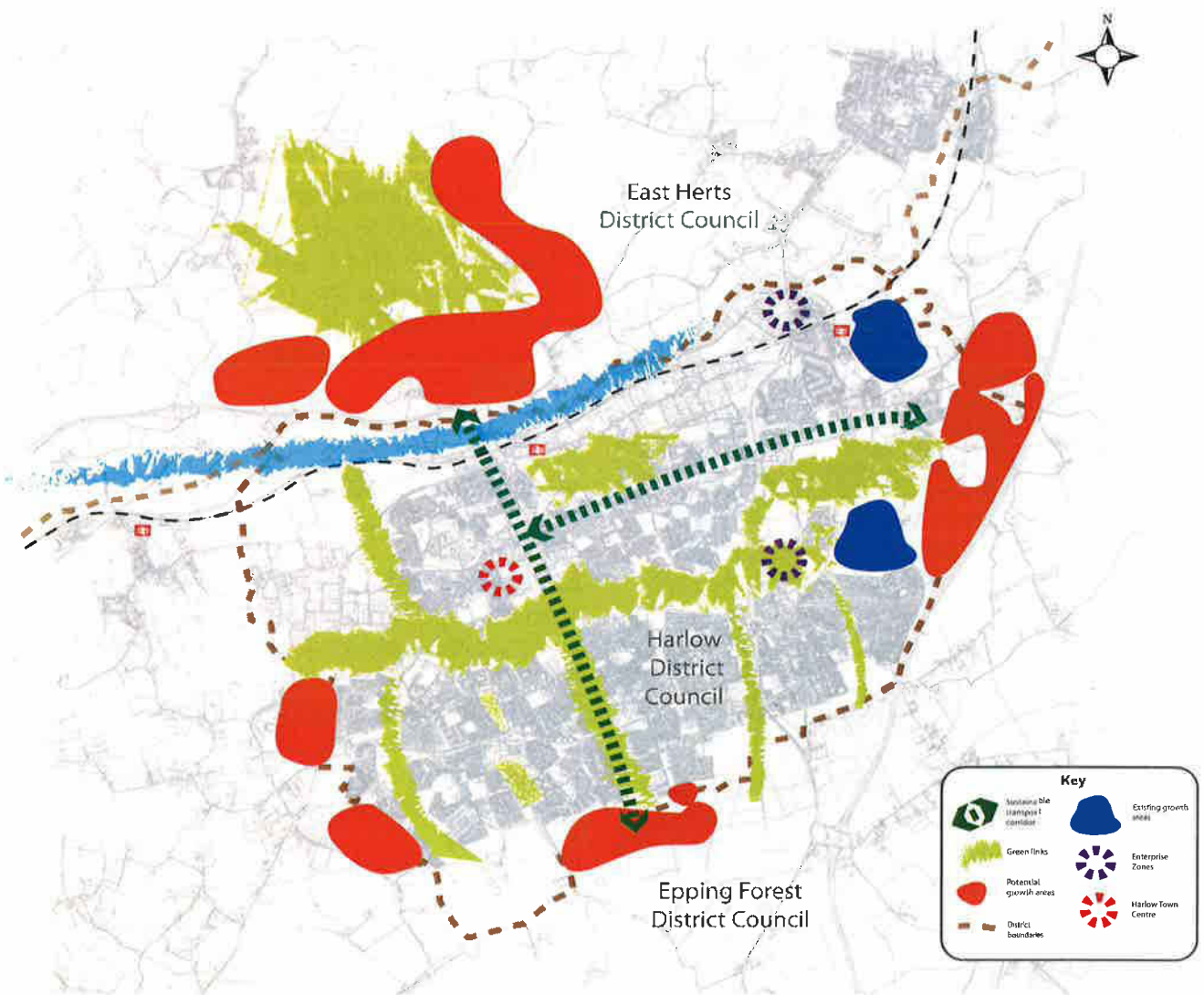


Figure 5: Concept Plan

2.4 Community engagement

For developers, communities and decision makers, one of the biggest challenges in taking forward a large scale development is to ensure that public engagement is undertaken in a way which is meaningful, inclusive and brings benefits for all involved.

The Councils recognise the value of early engagement and are committed to openly sharing and exchanging information, understanding different views, listening and responding to suggestions, developing trust and dialogue to support effective working relationships to the mutual benefit of all involved.

Through a combination of Local Plan processes and the emergence of development proposals the Councils will ensure under-represented individuals and groups are included and that they have an equal opportunity to be heard. The Councils will continue to work together to develop links with key groups and individuals who can assist and advise on what matters in the area. Further work will consider how existing community groups, networks and representatives might be involved, what barriers might exist and what help might be needed to build the capacity to engage.

The Councils will ensure that the information provided is clear, accessible and sufficient to tell people what they want to know, and to allow them to decide whether to engage. Communication will be clear about what is fixed and why, and what is 'up for debate'.

2.5 Long-term governance

In the longer-term, the Councils wish to jointly explore appropriate opportunities for long-term community ownership and governance. Strategic growth and place making must be accompanied by strong community capacity building and

empowerment. Ownership of assets and direct involvement in the place making process will be key. Discussions around the transfer of land assets to an appropriate community body are already underway in respect of the Gilston scheme.

It is envisaged this will examine what legal mechanisms exist for involving residents across all tenures in having a say in how their neighbourhood is run. Issues to explore include:

- explore how each neighbourhood involves residents in governance
- evaluate the different legal models used
- identify key principles in establishing a mechanism for involvement that works.



Illustrative vision for Gilston Park Estate



Interactive community engagement

3. Support Required

3.1 Brokerage

Delivering strategic growth of this scale will have major impacts on strategic infrastructure which is more than a local issue.

The process of evidence gathering in relation to transport modelling and evidence has been a particular cause of delay over recent years, and brokerage support will be necessary to ensure both plan making and individual sites can come forward without further delays. The Councils would like to work with Government to ensure the right mechanisms are in place to identify and resolve potential blockages, particularly in the area of strategic infrastructure delivery.

Brokerage will therefore be crucial to assist negotiations with statutory consultees, in particular Highways England and the Department for Transport who could represent a barrier to delivery in light of the strategic implications of the M11 and need for new investment contrary to the growth objectives of the Treasury. We would like to develop these relationships so there is a common understanding and a partnership which is committed to taking appropriate investment forward.

In addition, there is a need to work closely with the Department of Health in respect of the Princess Alexandra Hospital which is facing significant financial and clinical challenges and is considering relocation to a new site. This is a potential cause of uncertainty as the locational preference will have implications on growth proposals. Support to broker a solution will be important to avoid any such uncertainty or delay.

3.2 Enabling & capacity

Delivering growth at this scale is challenging, and it is not easy to achieve the Garden Town qualities in large new developments, partly because of the way the planning and development system works. Risks, costs and uncertainties prevail in the early stages of large-scale development, leaving the eventual developers of sites struggling to meet the legitimate aspirations of local authorities and local communities.

Whilst having a proven track record of delivery, the scale of development proposed is far beyond what any Local Planning Authority has dealt with over recent times and as such focus, dedicated resources, specialist advice and support will be required to move matters forward – particularly at this early stage when the 'ask' is being defined and refined. It is for this reason that the submission for support is being made. The proposal is ambitious in terms of scale and delivery, and will set high standards for design, quality and the provision of green space.

The Councils are already expending considerable sums as part of their formal plan making processes. In addition, all are committed to maintaining the joint working governance structure and established approach to partnership working.

Figure 6: Enabling & capacity ask

Strategic growth & delivery team		2016-17	2017-18
Strategic advice and scoping	Strategic advice, legal & financial support to evolve thinking around most suitable structure for the Joint Delivery Team.	£75,000	
Direct capacity/ resources	<p>Direct dedicated support, in the form of some form of dedicated team/unit to bring forward the Garden Town growth programme. This will include:</p> <ul style="list-style-type: none"> • Programme Manager; • Planning Manager/s (3 month contract 2016/17); • Infrastructure Manager; • Community Development & Communications Officer; and • Business Support Officer 	£100,000	£500,000
Evidence base & key consultancy support			
Garden Town Design Charter/Spatial Visioning	Preparation of a town wide charter / design guide to define and establish design principles to deliver on a local interpretation of Garden City principles, building upon the existing Harlow Design Guide.	£75,000	
Site specific masterplanning & infrastructure delivery planning	Emerging preferred sites will require further concept development & masterplanning work to provide a robust basis to bring delivery forward. This work will be required for each site to address Garden City principles, and establish the basis for design control. The Councils will need to show leadership and drive forward masterplans to provide a suitable and robust policy framework. These masterplans will need to be accompanied by additional working to evolve suitable and sustainable infrastructure delivery plans. This will need to include transport strategies, including appropriate levels of impact assessment work to satisfy ECC, HCC and HE. The preparation of a Concept Framework is already underway for the Gilston scheme, but a similar approach will be needed across other key sites.	£200,000	£100,000
Viability testing	Planning for viable delivery, including infrastructure assessment to ensure a clear plan is identified and prioritised to allow for early phased delivery. Early viability work is necessary to support policy formulation and demonstrate deliverability earlier in the plan period.	£50,000	£50,000
Community ownership models & stakeholder mapping	Professional support to evolve an appropriate approach to community ownership and stewardship, aligned to Garden City principles. Stakeholder mapping & community engagement strategy.	£25,000	£25,000
Hospital relocation feasibility study	The relocation of the hospital is causing a degree of uncertainty, and a study is required to assess feasible alternatives and agree a way forward.	£50,000	
Transport design work	The project has to date suffered from delays to modelling and associated design work around potential mitigation measures. Further resources are required to develop the concept of a sustainable transport corridor to support growth.	£100,000	£100,000
Sub total		£675,000	£775,000

Figure 6 overleaf sets out the various on-going and required workstreams, and defines the additional funding sought. This additional funding would enable the Councils to effectively evolve the Garden Town proposals to ensure they can deliver on the ambition, and put in place the dedicated resources required to drive the overall project towards delivery.

3.3 Financial & delivery innovation

The Councils would also welcome the opportunity to discuss possible legislation to support the creation of a high quality Garden Town in an innovative and locally led way. This could involve exploring appropriate delivery vehicle structures to enable local leadership, use of New Town powers, and any other associated powers or flexibilities to address land and funding needs.

Further flexibilities to deliver on Garden City principles in relation to establishing suitable local community ownership and governance structures (such as a community land trust) would also be welcomed. In the context of a wider trend towards the localisation of finance there are also opportunities to create a virtuous cycle of re-investment not currently available.

3.4 Planning flexibilities

In order to achieve their ambition of delivering starts by 2020, the Councils are jointly seeking greater planning freedoms to accelerate the process of bringing sites forward through the planning system. This is in addition to protections around their 5-year land supply, speeding up the engagement with statutory agencies, and closer coordination across the authorities with the Planning Inspectorate.

Local Plan Examinations

A key issue that the Councils will need to face is ensuring Local Plans can make effective progress through examination. The fact that several Local Plans are coming forward in tandem with shared issues between them could pose additional risk, and support from DCLG and PINS would be useful to minimise risk and establish suitable examination programmes. The Councils would like to explore the potential for closer co-ordination and alignment of examination processes across the planning authorities to avoid duplication.

Housing Land Supply

In recognition of the challenges posed in bringing forward strategic sites through the planning system the Councils would like to explore with Government opportunities for greater flexibility in terms of maintaining this supply during the period the Councils are pro-actively focusing resources on accelerating strategic sites through the planning system. This will enable the delivery focus to remain driving forward long-term sustainable growth rather than dealing with speculative planning applications and related appeals. In addition and related to financial flexibilities, it may be helpful to explore whether planning processes could be streamlined in any way to enable delivery to come forward effectively and efficiently, potentially aligned to any amendments to New Towns legislation.

4. The impact of support

Delivering the vision for a garden town through collaboration and cooperation

Effective partnership working in the housing market area has been given a good start through the work of the Co-operation for Sustainable Development Board. It is time to deepen this relationship and move to the next level to set out compelling, focused collaborative actions in the short, medium and long-term, where partners can achieve results together. This approach would help to build confidence in joint work and cross-boundary working, leading to more ambitious priorities and actions over the next five to ten years. Support will:

- Provide capacity to lead and coordinate on-going work such as infrastructure planning and the phasing of growth, going far beyond current traditional statutory duties of the Councils to properly plan for delivery.
- Broker and find solutions across Government, support in making sure issues are overcome and do not become a drag on progress
- Enable full and proper consideration of possible financial and planning freedoms, such as the potential for future legislation and/or current powers and delivery mechanism to achieve the level of ambition.

Accelerating the delivery of new homes and communities

There is ever increasing housing demand. Population growth has been extremely rapid across the London-Stansted-Cambridge Corridor. Between 2000 and 2014, the number of people living in the area increased by 438,700 – or 19.1 per cent – almost twice the growth rate across the UK (9.7 per cent). This growth is projected to continue at a steady rate. Housing completion rates, however, are not increasing to meet demand. Dedicated support will:

- Minimise risks to delivery, by front-loading evidence gathering and proper assessment to ensure that such problems do not become apparent late in the day, conflicting with expectations and causing paralysis of decision-making;
- Securing accelerated direct investment in both infrastructure and new homes construction, by achieving a faster and more effective process, bringing confidence to both the market and potential investors;
- With proactive support and leadership, sites can not only come forward sooner but also deliver at faster pace than traditional development models. For example, Places for People (the promoters for 'Gilston Park Estate'), intend to deliver broad tenure typologies and promote a design concept that will enable far greater housing delivery rates across multiple development fronts than may otherwise occur under traditional forms of housebuilder activity.

Deliver quality of place and connectivity in support of a globally competitive knowledge corridor

High quality housing, development, infrastructure, and location will boost the town's attractiveness to talent and investment. This in turn will lead to increased growth, productivity and competitiveness. Tech and life sciences industries thrive in high quality places and communities. Such locations are well connected, have great workforce skills and entrepreneurial talent. They have a richness and diversity that acts as a magnet to global talent and investment.

Appendix - planning context

A1 Wider housing needs

Harlow is a tightly-bound, principally urban, authority with limited scope to expand because of its tight administrative boundaries. As such, growth relies upon positive collaboration and joint-working between Harlow and direct neighbours, namely, Epping Forest District Council and East Herts District Council as well as Hertfordshire and Essex County Councils, Natural England, Conservators of Epping Forest and Highways England.

The four authorities of Harlow, Epping Forest District, East Herts and Uttlesford share the same Strategic Housing Market Area (SHMA) and they have collectively assessed housing needs to inform the preparation of respective Local Plans. Figure 7 sets out the emerging housing delivery numbers for individual Councils and the area as a whole. This sets the strategic context for growth, with a clear recognition that Harlow, as the major settlement that provides a range of high order services and employment opportunities for the wider area, will play a significant role in accommodating future area-wide growth.

There is a well-founded concern that these issues will continue to affect the town without concerted interventions and a comprehensive growth strategy effort to address these. Without intervention Harlow's long term prospects are considered to be weak, particularly given the position of comparator towns and cities elsewhere.

Figure 7: Emerging housing numbers

Local Authority	Net new dwellings 2011-2033
East Hertfordshire District Council	c.18,000
Epping Forest District Council	c.11,400
Harlow District Council	c.9,200
Uttlesford District Council	c.12,500
Total across the HMA	c.51,100
...of which the area in and around Harlow will provide	c.16,100

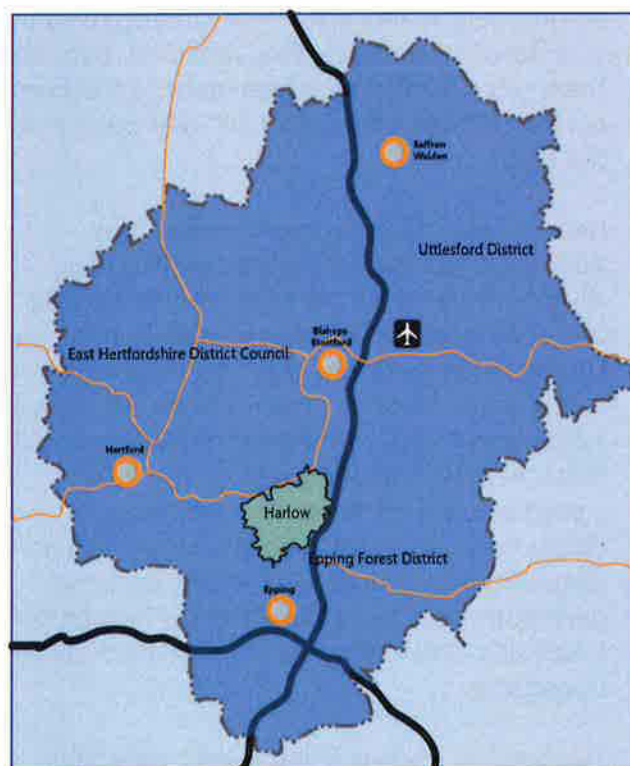


Figure 8: West Essex/East Hertfordshire Strategic Housing Market Area

A2 Local Plans

The three Councils are all at similar stages in preparing Local Plans, and are well advanced in their thinking around the approach to growth.

Harlow Council

In Harlow, there is a clear commitment to bring forward housing development to the east of the town and develop and regenerate a number of urban sites within the built up area of the town in order to deliver growth and regeneration. The Council's Issues and Options document, prepared in 2010, identified spatial options for growth around Harlow. This document, underpinned by a number of evidence studies, stated inter-alia that there was potential to deliver up to 11,000 homes north of Harlow and up to 7,300 new homes to the east.

Harlow Council's 2014 Emerging Strategy document and Further Options consultation document identified the regeneration benefits of a number of growth scenarios around Harlow supported by evidence undertaken by Nathaniel Lichfield and Partners. It recommended between 12,000 and 15,000 new homes at Harlow would meet the town's housing need and provide a positive platform to deliver regeneration objectives. The document also showed a clear commitment to bringing forward substantial development in and around Harlow including Green Belt land to the east within Harlow District boundaries.

The Council is now looking to prepare a new Local Plan for consultation in autumn/winter 2016 which again will show a clear commitment to growth and regeneration in and around Harlow, working together with the SHMA authorities to align Local Plan policies and timetables. The Plan will identify capacity for up to 9,200 dwellings in Harlow itself.

Epping Forest District Council

Epping Forest District Council consulted on Issues and Options (Community Choices) for the Local Plan in 2012. Since then much technical evidence base work has been undertaken including a Green Belt Review, a revised HMA-wide SHMA, economic studies, updates of the SLAA, and viability work. The Vision for the Local Plan (2011-2033) seeks to protect and enhance green spaces whilst encouraging appropriate levels of growth to provide for the housing, employment and social needs of the District.

The Council is now preparing a Draft Local Plan for consultation starting at the end of October 2016, which will show the proposed allocation of sites to meet the District's share of the Objectively Assessed Housing Need as defined by the SHMA for the Housing Market Area (approximately 11,400 dwellings). For several years the Council has worked with the other authorities in the HMA, to assess housing need and economic need, and to agree the most appropriate strategic spatial distribution of growth, including the quantum in and around Harlow, taking account of infrastructure requirements and other constraints. Much of this work has also involved other Local Councils, County Councils and other bodies, through the Co-operation for Sustainable Development Member Board, and the Co-operation for Sustainable Development Officer Group.

It is currently expected that the Publication stage will take place in summer 2017, followed by submission to the Planning Inspectorate in late 2017.

East Herts District Council

The Gilston Area was identified within the Preferred Options version of the East Hertfordshire District Plan in 2014 as a 'Broad Location for Growth' for the delivery of 5,000 to 10,000 new homes along with supporting infrastructure such as schools, roads and healthcare facilities. Since undertaking the Preferred Options consultation, the Council has continued to gather a significant amount of technical evidence. In particular, a document known as the Delivery Study was prepared which, in part, assessed whether development in the Gilston Area would be financially viable and deliverable within the plan period.

Given the range of evidence that is now in place, the Council is working closely with the site promoters in order to reach a position where the Gilston Area can be identified as an allocation for 10,000 new homes, to be delivered in this plan period and beyond, within the forthcoming Regulation 19 'Publication' stage of the District

Plan. It is currently expected that the Publication stage consultation will take place in Autumn 2016, followed by submission to the Planning Inspectorate in March 2017.

Key Next Steps

Figure 10 below illustrates the current position and key areas of work that are ongoing to enable the Councils to finalise their plans and publish for consultation.

The work programme is aiming for all three Local Plans to go through internal approval processes through Summer-Autumn 2016 and be published for consultation by the end of the year. The Plans will then progress into examination and adoption in 2017. It is anticipated that in tandem proposals will be worked up for individual sites, with planning applications coming forward.

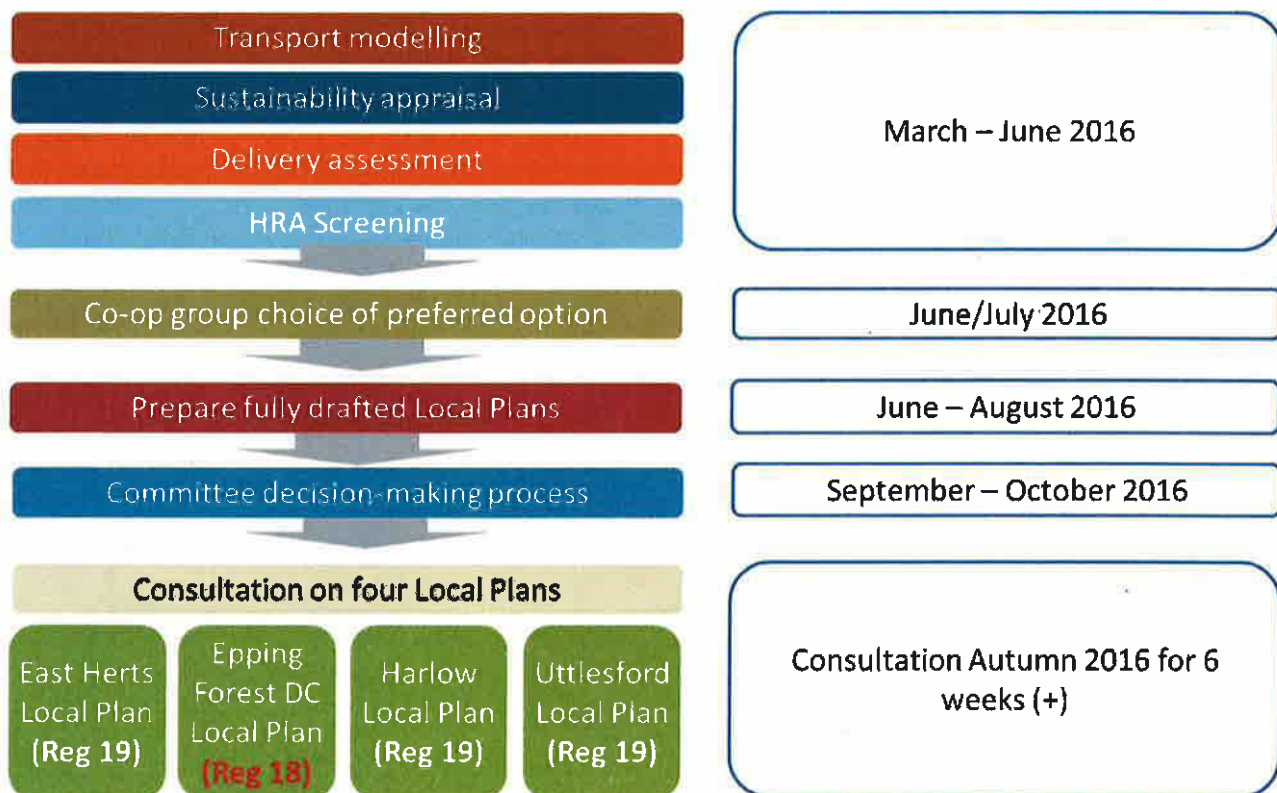


Figure 9: Local Plans Timescales

A3 Partnership-working

Considerable joint-working is long established locally. A Co-operation for Sustainable Development Board ('the Board') has been operational since 2014 with responsibility for identifying the sustainable development issues that impact on more-than-one local planning area and agreeing how these should be managed. This covers the whole local plan cycle from plan-making, through to delivery and monitoring. It is an advisory body, and any decisions resulting from its advice remain the responsibility of its constituent councils.

The Board has two key aims and objectives:

1. To support Local Plan-making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. It will do this by identifying and managing spatial planning issues that impact on more than one local planning area within West Essex, East Herts and the adjoining London Boroughs.
2. To support better integration and alignment of strategic spatial and investment priorities in West Essex, East Herts and adjoining London boroughs, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

In order to support the economic growth points within the area and investor confidence, recognising the different attributes and

contributions made by the individual member councils, the Board also works jointly with the Local Enterprise Partnerships to understand long-term investment priorities and ensure that these are aligned with other public and private sector investment plans.

Core membership of the Board as set out in Figure 10 comprises representatives from Harlow, Uttlesford and Epping Forest Districts, Brentwood Borough, Chelmsford City and Essex County Councils, East Herts and Broxbourne Districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield. The GLA has observer status and is sent minutes of meetings and invited to engage at appropriate times.

Regular feedback and briefing to the constituent members' political and corporate leadership is the responsibility of member representatives, and is used as a way of ensuring wider ownership and support for the Board's work as it progresses.

The Board is supported by an officer group, known as the Co-operation for Sustainable Development Officer Group, with representatives from each of the constituent authorities. The group advises the Board on technical issues, and acts as a steering group for any identified project, establishing suitable technical support and project management arrangements for each. This involves the use of 'task and finish' groups and could include the use of external expertise e.g. from key statutory bodies or the use of consultants.

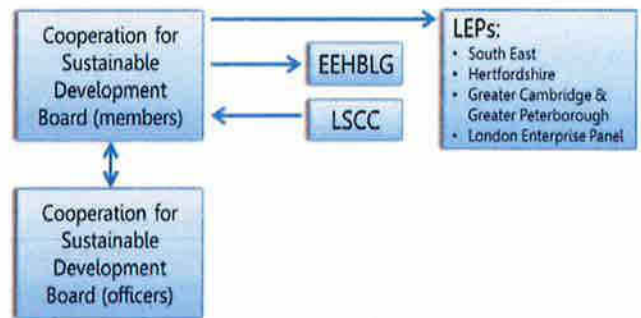
Figure 10: Co-operation for Sustainable Development



Key relationships as set out in Figure 11 are maintained with all relevant LEPs and other bodies:

- South East LEP, Hertfordshire LEP, Greater Cambridge and Greater Peterborough LEP, London Enterprise Panel - the Board will work closely with all LEPs to ensure the long-term integration of strategic planning and investment priorities. The LEPs play a key support role on economic development and regeneration and are responsible for major funding streams.
- London-Stansted-Cambridge Consortium - an established partnership of public and private sector organisations, including Councils, which covers the area from Tech City, the City Fringe, King's Cross, and the Olympic Park, up through the Lee Valley and M11/A10 and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge. The principal objective of the consortium is to drive economic development and enhance quality of life in the north London – Stansted – Cambridge corridor. This means not only driving job growth through productivity and investment, but more importantly increasing economic activity, by ensuring local communities access employment opportunities.

Figure 11: key relationships



- Other key partners - a number of key bodies and organisations are necessary to support the work of the Board either through direct support/advice or through joint projects. Key bodies include the Lee Valley Regional Park, the Corporation of the City of London (responsible for Epping Forest), the Environment Agency, Highways England, and the Homes and Communities Agency. Private sector infrastructure providers, particularly utility companies, will also be key partners particularly in terms of ensuring alignment between investment plans and priorities.

Letters of support



Garden Villages Team
Homes and Communities Agency
2 Marsham Street
London SW1 4D

Hertfordshire County Council
County Hall
Pegs Lane
Hertford
SG13 8DN

2 September 2016

Dear Sir/Madam

Locally led Garden Villages, Towns and Cities Programme

As Executive Member for Environment, Planning and Transport at Hertfordshire County Council, I am pleased to write in support of the bid by East Herts District Council, Epping Forest District Council and Harlow Council to be part of the Governme

As is set out in the Expression of Interest, the county council have been heavily engaged with the discussions concerning the potential growth of Harlow and in particular the development of the proposals for the Gilston area.

It is imperative that this major green field development builds embodies the philosophy of the original Gibberd designed New Town and delivers a truly sustainable set of new communities, based on a modern interpretation of Garden City principles.

Hertfordshire , being the home of the first two Garden Cites, is very supportive of continuing to develop and enhance the core ideas of the original movement in a contemporary way.

We are therefore hopeful that the Government will support this bid for support to help deliver a really outstanding set of new communities both in and around Harlow.

Yours faithfully

Derrick Ashley

Essex County Council
Cabinet Office
County Hall
Chelmsford
Essex CM1 1QH



To: Garden Town/Cities Team
Homes and Communities Agency
2 Marsham Street
London SW1 4DF

16 September 2016

Dear Sir/Madam,

Locally led Garden Villages, Towns and Cities Programme

I am writing to add my support to that expressed by other Authorities in respect for the funding bid for the Harlow Garden Community.

Harlow is an important community in North West Essex ideally located in the London-Cambridge corridor. Having previously chaired Harlow Renaissance Ltd for five years I well understand that transformation of Harlow into a prosperous, growing and less dependent community is in term dependent on imaginative and innovative expansion.

The fact that Harlow has attracted the support in principle of both East Herts and Epping Forest District Councils makes such expansion a real possibility. Harlow has been constrained by its own borders and outward growth, particularly that crossing the River Stort, can facilitate new sustainable housing- not only in the areas of expansion, but within the existing town footprint.

The immediate piece of work is required to identify exactly where that expansion is best placed. Importantly, it will also chime with detailed design work around the creation of the new Junction 7a on the M11.

Yours faithfully

Cllr John Spence
Cabinet Member for Finance, Housing
and Planning



Council Offices, London Road, Saffron Walden, Essex CB11 4ER
Telephone (01799) 510510, Fax (01799) 510550
Textphone Users 18001
Email uconnect@uttlesford.gov.uk Website www.uttlesford.gov.uk

Chief Executive: Dawn French

19 September 2016

Please ask for Richard Fox on 01799 510346
email: gglenday@uttlesford.gov.uk

Dear Sir/Madam

HARLOW AND GILSTON GARDEN TOWN

Uttlesford District Council is pleased to endorse the proposal and bid for the Harlow and Gilston Garden Town by East Herts, Epping Forest and Harlow Councils.

Uttlesford is part of the Strategic Housing Market Area (SHMA), together with the bid authorities, who are collectively planning for over 50,000 new homes up to 2033 together with associated infrastructure and employment opportunities.

The Spatial Vision for the SHMA focusses growth in and around Harlow. Key to realising this will be the successful delivery of the new settlement focussed on garden city principles.

Uttlesford hopes this bid is successful.

Yours faithfully

Gordon Glenday
Assistant Director Planning

LSCC

London. Stansted. Cambridge. Consortium

LSCC Secretariat
6th Floor,
River Park House
225 High Road
London
N22 8HQ

19th September 2016

Harlow and Gilston Garden Town

The London Stansted Cambridge Consortium is the strategic partnership of local government, the GLA, further and higher education and the private sector which was formed in 2013 to raise the profile, lobby for improved infrastructure and to support the growth of key knowledge sectors in the corridor between London and Cambridge.

The Consortium is pleased to support the proposal for the Harlow and Gilston Garden Town and I have summarised the reasons below.

region with jobs and population growing at twice the national average; enterprise growing at more than double the national average; and with a productivity that is 16% higher than

industries which has grown at nearly three times the national average during the post recession period (2009-2014) and which contribu

At the heart of the Corridor, and very close to Harlow is London Stansted Airport which over

11,000 people and with capacity to add another 10,000 jobs within current planning constraints.

A recent independent review, the LSCC Growth Commission, noted the importance of the Corridor to the UK economy and suggested that it has the potential to become one of the s rivalling those in the US and Far East.

However, the Commission highlighted lack of housing and affordability as challenges to the ensure the Corridor can attract and retain the businesses and the skilled workforce.

and scale of the economic growth means that other parts of the Corridor, Harlow particularly, need to play their full role in providing space for new housing and new jobs. Through their joint work, the districts of East Herts, Epping Forest and Harlow with the support of Broxbourne Borough and Uttlesford (the planning authority for Stansted Airport) are developing an ambitious vision, with supportive planning so that this area, the LSCC Core, can play a full role in realising the potential of the London Stansted Cambridge Corridor.

This is why the London Stansted Cambridge Consortium, the strategic partnership for the Corridor, strongly supports the work of the LSCC Core in developing their joint vision and strongly supports this Garden Town proposal for Harlow and Gilston.

Yours sincerely

John McGill
Director, LSCC



CITY & PROVINCIAL
PROPERTIES PLC



20 September 2016

Places for People Group
6th Floor
80 Cheapside
London
EC2V 6EE
0207 429 0445

Mr Chris Butcher
East Herts Council
Planning Department
Wallsfields
Pegs Lane
Hertford
SG13 8EQ

Dear Mr Butcher

HARLOW AND GILSTON GARDEN TOWN: EXPRESSION OF INTEREST

Places for People & City and Provincial Properties confirm their support for the Harlow Garden Town Expression of Interest produced by East Herts District Council ("EHDC"), Harlow District Council ("HDC") and Epping Forest District Council in response to the Locally Led Garden Villages, Towns & Cities Prospectus issued by Government in March 2016.

Places for People & City and Provincial Properties welcome the innovative and positive approach being taken by the Councils, and are pleased to see that it incorporates the work they have undertaken at Gilston, with input from the authorities.

Background

Places for People & City and Provincial Properties are the joint landowners of the Gilston Area in East Herts which is being promoted for a residential led development of 10,000 new homes within seven carefully planned individual 'villages'.

Places for People's landownership within the Gilston Area extends to circa 1000 ha and accommodates 6 of the 'villages', sensitively designed around an improved Gilston Park providing around 8,500 homes – known as Gilston Park Estate. The seventh 'village', promoted by City and Provincial Properties, is located to the south west of the Gilston Area on land referred to as the Briggens Estate, which provides circa 1,500 homes.

We have appointed a consultant team to undertake extensive technical assessment and evidence base work to enable the production of a sustainable and deliverable concept masterplan for the site – a copy is attached to this letter.

Working alongside EHDC, as well as HDC, and in light of the technical information that exists to support and justify the proposals, it is expected that the Gilston Area will be identified as a Site Allocation for 10,000 homes in the Pre Submission version of the District Plan which is scheduled to under-go public consultation in November 2016.

The Gilston Area and the Harlow Garden Town Expression of Interest

The Gilston Area and Harlow are situated within the M11 sub region which is one of the most economically productive and fastest growing areas of the UK. New jobs in the sub region generate more GVA than anywhere else in the country. The corridor linking London, Stansted and Cambridge is home to world-leading clusters in education, life sciences, health, pharmaceuticals and technology – meaning it is home to the country's highest skilled workers.

As a result, people want to live and work in the sub-region, and it is attractive to businesses. However, housebuilding has not kept up with population growth, and house prices are climbing – well in excess of wage growth.

In East Hertfordshire, the median house price is 9 times the average income. Even the cheapest 25% of homes are not affordable for residents on the lowest 25% of wages. In Harlow, where residents earn less on average than those in neighbouring districts, local housing options are even more limited with prices up to 10 times incomes.

Many young people cannot afford to start a life in the area and the existing population is ageing. As a result, the sub-regions' working age population will continue to fall as a proportion of all residents if nothing is done to arrest the trend. This has serious implications for the continued economic and social success of the sub-region.

For the London Stansted Cambridge Corridor to realise its economic growth potential, the working age population must grow at a faster rate than is currently predicted. Thousands of new homes and associated infrastructure are required to offer younger workers and their families attractive places to live. Without major investment in new homes, skilled working age people will continue to be priced out of the regional housing market.

Harlow has an Enterprise Zone, and Public Health England has announced a £350million investment moving their operations into Harlow. Although investment has been made in the Enterprise Zone, for the full benefits of this to be achieved, housing growth, infrastructure investment and Harlow's regeneration are key.

When Harlow New Town was created it provided urgently needed homes and jobs. It was always planned to grow however the Green Belt was wrapped around it and its economic performance has been constrained as a result. It has all of the ingredients for sustainable economic growth and prosperity, however, Harlow needs investment into homes and the quality of life to support the jobs that will be created. As with many new towns, when all of the infrastructure was delivered in a comparatively short period, it starts to age at the same time. The healthcare, education, rail and social facilities all need urgent investment. The Gilston Area can play a major role in addressing this.

The Gilston Area proposals comprise 10,000 new residential homes, delivering a full range of housing typologies from market sale to affordable, and starter and self-build homes to diversify the local housing offer. The homes will be supported by a full range of physical and social infrastructure including health care facilities, primary and secondary education places, and a comprehensive network of green space. It will create 1,500 new jobs on-site and support 6,500 jobs in the wider economy, as well as create a substantial number of construction related jobs.

Uniquely to other development sites being considered in the wider Harlow area, the Gilston Area proposals will make a significant contribution to addressing the substantial local housing need in EHDC, whilst also supporting the urgent economic and social regeneration of Harlow.

As you will see from the masterplan Places for People & City and Provincial Properties have embraced the garden town principles, and are already engaged with the Councils about how these will be built into the fabric of the new community.

Summary

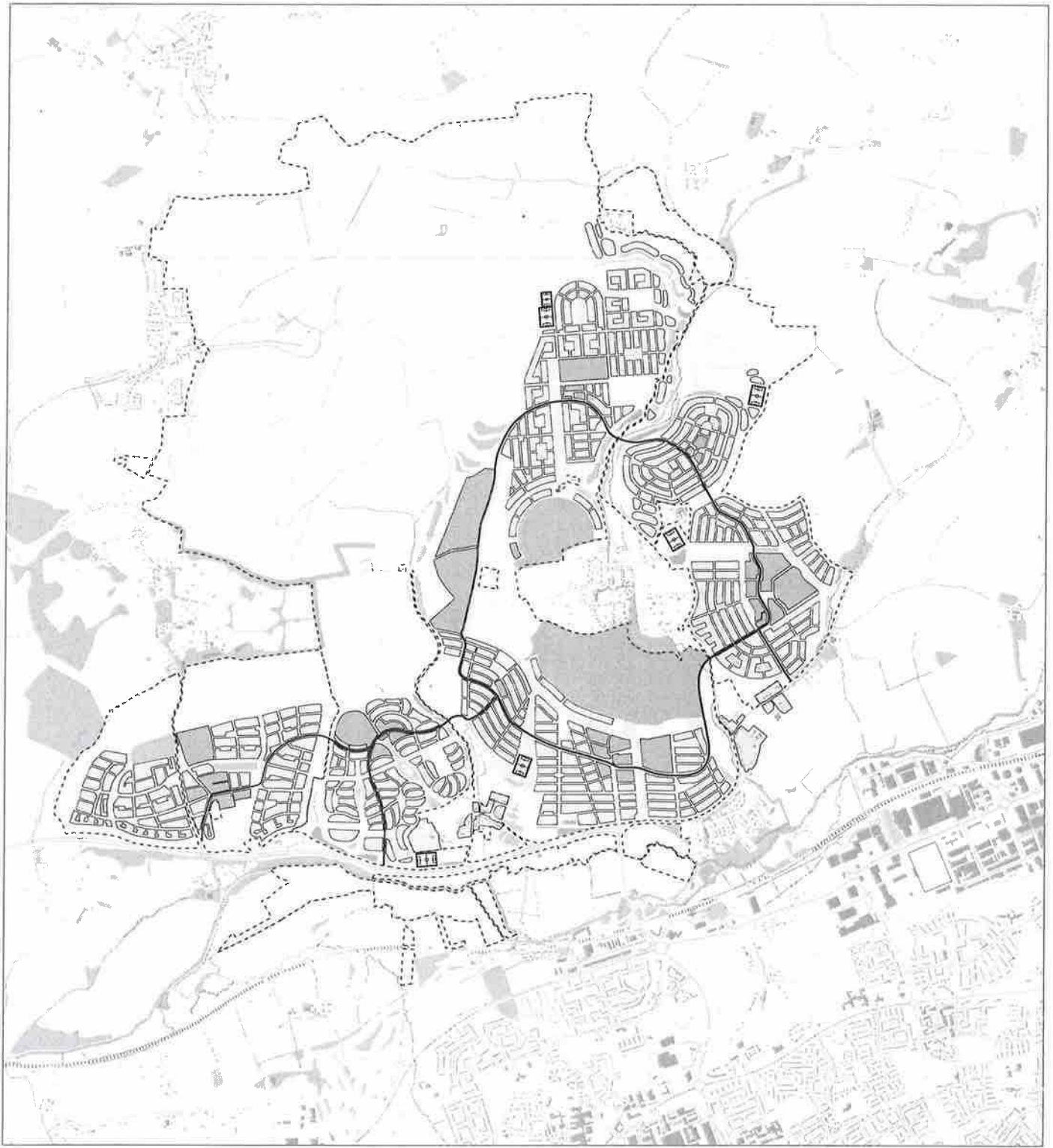
Places for People & City and Provincial Properties are clear that the Gilston Area has a central and important role to play in assisting meet the strategic growth requirements of the greater Harlow area. The proposals are supported locally having been identified in the emerging EHDC District Plan. They have been developed from the original Gibberd vision for Harlow as well as the original Garden City ethos. As a result, they are pleased to lend their support to this Expression of Interest which seeks to deliver transformational growth at Harlow, a central component of which is the realisation of development at the Gilston Area.

Places for People & City and Provincial Properties strongly commend the Expression of Interest proposals and hope they are supported by the Government. Critically, we hope that the Government will assist the wider growth of Harlow and investment in the area by committing to a programme for the transport improvements required to support the Councils' growth aspirations. We hope to have the opportunity to work with you, both through the planning process but also through our access to private finance and ability to enable innovative funding models, capitalising on land value uplifts, which can ensure they are delivered.

Yours sincerely

Mary Parsons
*Group Executive Director
Placemaking and Regeneration
Places for People Group*

Chris Lovegrove
*Director
City & Provincial Properties*



A3
 Page 146

Key	
[Symbol]	Blocks Residential
[Symbol]	Blocks Mixed Use
[Symbol]	Blocks Commercial
[Symbol]	GLD10 Use Plans Zone
[Symbol]	GLD10 City Front Zone
[Symbol]	Gilston Area Site Boundary
[Symbol]	Primary Road Network



GRIMSHAW		RICK MATHER		FIGURE GROUND													
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<table border="1"> <tr> <td colspan="2">Title: Gilston Area Neighbourhood Masterplan</td> <td>Issue 02 of 03</td> </tr> <tr> <td>Date: 11.02.2016</td> <td>Scale: 1:10000</td> <td></td> </tr> <tr> <td>Project: EPC</td> <td>Author: JMB</td> <td>Check/Approved:</td> </tr> <tr> <td colspan="3">Notes:</td> </tr> </table>						Title: Gilston Area Neighbourhood Masterplan		Issue 02 of 03	Date: 11.02.2016	Scale: 1:10000		Project: EPC	Author: JMB	Check/Approved:	Notes:		
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Project: EPC	Author: JMB	Check/Approved:															
Notes:																	

Garden Villages Team
Homes & Communities Agency
2 Marsham Street
London SW1P 4DF

27th September 2016

Dear Sirs,

Harlow & Gilston Garden Town

I am pleased to confirm Hertfordshire Local Enterprise Partnership supports the bid by East Hertfordshire District Council, Epping Forest District Council and Harlow Council to create a Garden Town at Harlow and Gilston.

Whilst encouraged by the work the Councils have undertaken to date with the support of the Homes and Communities Agency, Hertfordshire LEP fully appreciates the enormous amount of work and difficult resource implications that will be faced by the Councils going forward. As such, the LEP wishes to endorse the funding bid put forward by the Council in line with the Government's Garden Villages, Towns & Cities Prospectus.

Hertfordshire and Essex are facing immense housing and employment growth over the next 20 years or so. While local planning authorities are working hard to accommodate growth wherever possible within or adjoining their existing settlements, it is our firm view that significant development at Harlow will be required. Given the significant lead-in time required to bring forward such a major endeavour, local planning authorities need to start planning for it now, hence our support for this bid.

Hertfordshire LEP is fully committed to work with the Councils and other partners to bring forward transformational growth at Harlow.

Yours faithfully

Adam Wood – LEP
Infrastructure Delivery Manager
Hertfordshire Local Enterprise Partnership

Appendix D

DRAFT
Memorandum of Understanding

**Managing the impacts of growth within the
West Essex/East Hertfordshire Housing Market
Area on Epping Forest Special Area of
Conservation**

between

East Hertfordshire District Council
Epping Forest District Council
Harlow District Council
Uttlesford District Council

Essex County Council
Hertfordshire County Council

City of London Corporation (Conservators of Epping Forest)
Natural England

September 2016



Uttlesford
District Council



Essex County Council



CITY
OF
LONDON



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3. Evidence Gathering to inform a Joint Strategy.....	6
4. Developing a Joint Strategy.....	7
5. Signatures.....	9
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Appendix 2 – Road links to be investigated around Epping Forest	12
Appendix 3 – Air quality predictive modelling method	13

DRAFT

1. Introduction

- 1.1 The *Conservation of Habitats and Species Regulations 2010*¹ (“the Habitat Regulations”) set out that where a land use plan, either alone or in combination, is likely to have a significant effect on a European site, the plan-making authority must make an appropriate assessment of the implications for the site taking into account the site’s conservation objectives. The local authorities party to this Memorandum of Understanding (MoU) are working together under the Duty-to-Cooperate as defined by the Localism Act 2011. The areas of proposed Local Plan development covered by this MoU are within the bounds of the four district local authorities which make up a Housing Market Assessment (HMA) area, agreed under a separate Memorandum of Understanding². A map of the area covered by this MoU is shown at **Appendix 1**.
- 1.2 There are a number of significant areas for nature conservation within the HMA. Epping Forest is highlighted as a habitat that requires more detailed attention. It is the largest public open space within and adjoining London, covering around 2,450 hectares. It stretches from Manor Park to just north of Epping, with the main body of the Forest being located to the west of Loughton. Two thirds of the Forest has been designated a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC). The SAC status was confirmed in April 2005, with the primary reasons for designation being the presence of beech forest habitat and stag beetles. Dry and wet heath habitats are also cited as key features. Detailed information about the designation is available from the Joint Nature Conservation Committee website³.
- 1.3 There are known current challenges to the integrity of the part of the SAC which falls within the boundary of Epping Forest District Council. These include in particular, threats posed by air pollution and recreational pressures. The main threats and challenges are set out in Natural England’s (NE’s) Site Improvement Plan (SIP) for Epping Forest SAC (NE 2015)⁴.

¹ 2010 Conservation of Habitats and Species Regulations

<http://www.legislation.gov.uk/ukxi/2010/490/contents/made>

² 2016 Memorandum of Understanding: Distribution of Objectively Assessed Need across the West Essex/East Hertfordshire Housing Market Area

³ 2005 JNCC *Epping Forest Site Details*

<http://jncc.defra.gov.uk/ProtectedSites/SACselection/sac.asp?EUCode=UK0012720>

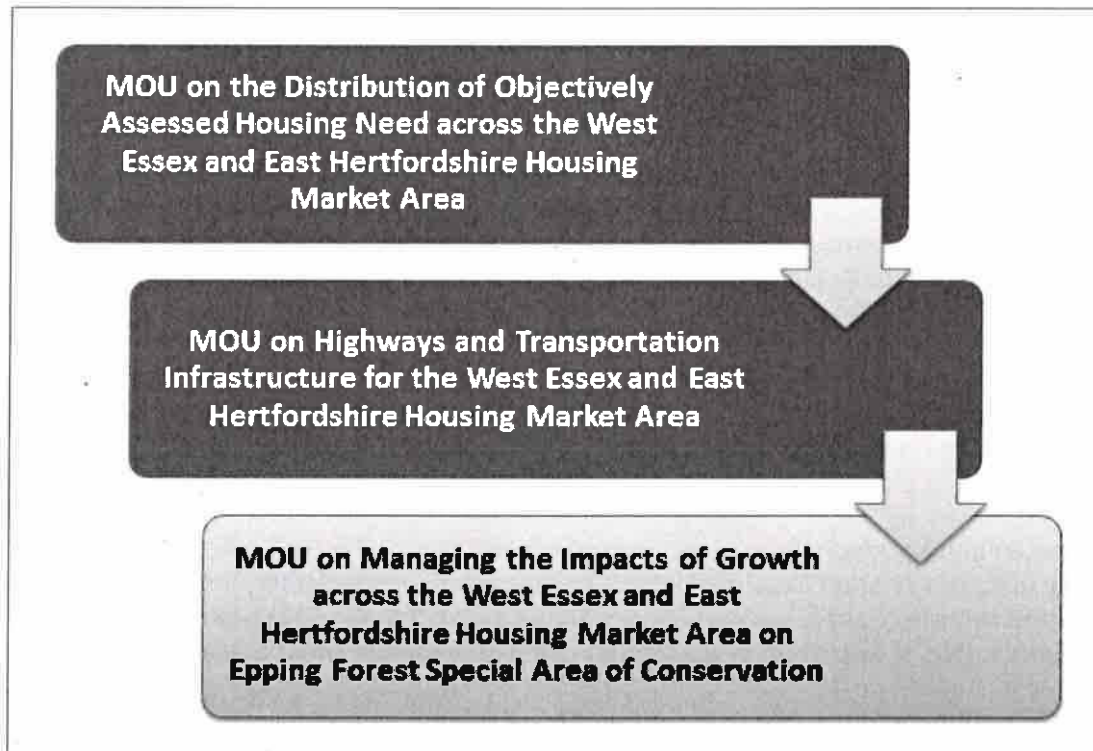
⁴ 2015 Natural England *Site Improvement Plan: Epping Forest*

<http://publications.naturalengland.org.uk/publication/6663446854631424>

2. Purpose of this Memorandum of Understanding

- 2.1 This MoU is one of a group of three related memoranda. The other two deal with the Distribution of Objectively Assessed Need across the West Essex /East Hertfordshire Housing Market Area, and Highways and Transportation Infrastructure, as shown in Figure 1.

Figure 1 - Inter-related Memoranda of Understanding



- 2.2 Currently air pollution is adversely affecting the Forest with Critical Loads of Nitrogen exceeded across the whole Forest and Critical Levels exceeded across a significant proportion of Forest Land. These exceedances affect the health and resilience of trees and impact on the balance of vegetation and fungal communities. The emerging spatial options for the distribution of growth across the HMA have been subject to an assessment of air quality to determine whether any of those options are likely to have an unacceptable impact on the Epping Forest SAC. The detailed findings of this assessment are subject to a separate report [insert reference] as part of the Habitats Regulations Assessment (HRA) process.
- 2.3 The assessment of air quality has been derived from transport modelling data, which are forecasts based on the best available data. It is therefore necessary to continue to monitor the position, and ensure that where any adverse impacts begin to emerge, that the partners are aware of these, and in a position to respond to the changing evidence. It is therefore necessary to establish an appropriate evidence base and monitoring framework.
- 2.4 The purpose of this MoU is to ensure that the parties named, work in partnership to fulfil the following requirements:
- i. to collect and analyse data and evidence related to the impacts of proposed development and growth under the Local Plans to provide sufficient and robust evidence on which to base a strategy for the protection of Epping Forest SAC;

- ii. to commit to prepare a joint strategy, based on relevant available data and evidence and to an agreed timetable; and
- iii. that the joint strategy will address both the requirement to avoid, or effectively mitigate, adverse impacts on the integrity of the SAC from Local Plan-led development and the requirement to prevent deterioration of the SAC features.

DRAFT

3. Evidence Gathering to inform a Joint Strategy

- 3.1 Natural England (NE), with the Environment Agency, published a Site Improvement Plan (SIP) for Epping Forest in 2015. This identified seven main pressures on the integrity of the SAC and provides the reference point for the scope of the data and evidence-gathering required under this MoU. Evidence will be collected and analysed to determine whether any of these pressures are worsening over time, and whether the growth planned across the HMA is a causal factor. NE will provide detailed and timely advice on the data required, to ensure it is collected within an appropriate and realistic timescale
- 3.2 Unless modified by further NE advice as a result of any future SIP revisions (including newly-identified pressures), all parties to this MoU agree that the data to be collected will include:
- allocated housing and commercial development sites, including delivery timeframes;
 - highways infrastructure changes;
 - public transport developments;
 - visitor numbers and behaviour, purposes of visits and distances travelled;
 - forecast change in traffic flows, and subsequent impacts on air quality including continued monitoring of the Bell Common Air Quality Management Area; and
 - forecast change to visitor pressures, and any significant positive or negative impacts.
- 3.3 Based on these data, assessments will be made of the ecological impacts that would be the consequence of predicted/likely changes in air pollution and recreational pressures to allow avoidance and mitigation plans to be put in place.
- 3.4 At this stage it is not clear how far visitors to Epping Forest travel, and therefore to what extent the growth in housing across the Housing Market Area may increase visitor and recreational pressures. The costs of gathering the appropriate data to provide a robust evidence base would be borne by the local authorities and prospective developers, as appropriate and proportionate to the development proposals across the HMA in relation to impacts on Epping Forest SAC.
- 3.5 Each party to this MoU agrees to ensure that its approval of the data is provided in a timely manner and is not unreasonably withheld. Any withholding of such approval would require a full written justification setting out clear remedial action that it would be reasonable for the data-gathering parties to take forward to meet their competent authority responsibilities under the Habitat Regulations 2010.

4. Developing a Joint Strategy

- 4.1 The organisations party to this Memorandum (MoU) agree to work together to facilitate the collection of data and evidence as outlined in section 3, in order to develop a Joint Strategy to address potential adverse impacts on the integrity of Epping Forest Special Area of Conservation (SAC), as required under the Habitats Regulations 2010. Epping Forest District Council (EFDC) will act as the coordinating competent authority in relation to Epping Forest SAC as defined by the Habitat Regulations 2010 and as described in the Defra Guidance 2012⁵.
- 4.2 The Joint Strategy will be prepared in accordance with a timetable to be agreed by the partners to this MoU in due course. It is intended this Joint Strategy will be in agreed and published prior to the determination of any of the planning applications on sites around Harlow that are part of The Spatial Option detailed in the "Distribution of OAN across West Essex and East Hertfordshire" MoU. If the Joint Strategy is not in place when planning applications are submitted, applicants will be required to submit the necessary information to ascertain whether any adverse impacts will be caused in Epping Forest, and if necessary any mitigation measures that may be necessary.
- 4.3 The Joint Strategy will incorporate early warning monitoring to ensure that adverse impacts do not occur or are mitigated effectively for the SAC. Should this monitoring identify a deteriorating position, sustainable mitigation strategies for air quality, traffic controls, highways and recreation will be set out in the joint strategy so they can be enacted in a realistic timescale if necessary. Local Plans will include appropriate monitoring policies.
- 4.4 Detailed monitoring frameworks will be prepared to support each of the adopted Local Plans, and some of the required data will be made available on a regular basis through this mechanism. Where additional data is required, the scope of this will be agreed by the parties to this MoU as part of the proposed joint strategy.
- 4.5 Based on the agreed spatial distribution and the associated infrastructure requirements, data would need to be generated by traffic modelling to continue to monitor the likely impacts of vehicle transport on Epping Forest SAC. The traffic models would need to meet the level of resolution required to make robust predictions, to cover all the roads within the Forest boundaries, as identified in the map in **Appendix 2**.
- 4.6 From these traffic data, robust monitoring of air quality and predicted levels and rates of change would be made using the standard assessment methods for the area bounded by Epping Forest SAC (see **Appendix 3**).
- 4.7 The overall health of the Epping Forest SAC is affected by activities outside of the HMA, and therefore the remit of the Joint Strategy may need to be broadened in due course. The overall purpose is to manage Epping Forest such that further deterioration is limited, and positive enhancements are introduced as necessary.
- 4.8 Under the joint strategy further development would be linked to any necessary mitigation such that the identified and required actions would be in place and effective prior to any development being undertaken.
- 4.9 Sources and levels of funding for the different levels of mitigation, if and/or when required, will be agreed and will be put in place under the joint strategy.

⁵ 2012 DEFRA Guidance on competent authority coordination under the Habitats Regulations
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69580/pb13809-habitats-guidance.pdf

- 4.10 The joint strategy would be reviewed at the time of the review of this MoU or earlier should circumstances require it and be agreed by all parties.

DRAFT

5. Signatures

5.1 This Memorandum of Understanding is signed by and duly authorised for and on behalf of:

East Hertfordshire District Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

Epping Forest District Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

Harlow District Council

Name (printed): _____

Signature: _____

Designation: _____

Date: _____

Uttlesford District Council

Name (printed): _____

Signature: _____

Designation: _____

Essex County Council

Name (printed): _____

Signature: _____

Designation: _____

Hertfordshire County Council

Name (printed): _____

Signature: _____

Designation: _____

Natural England

Name (printed): _____

Signature: _____

Designation: _____

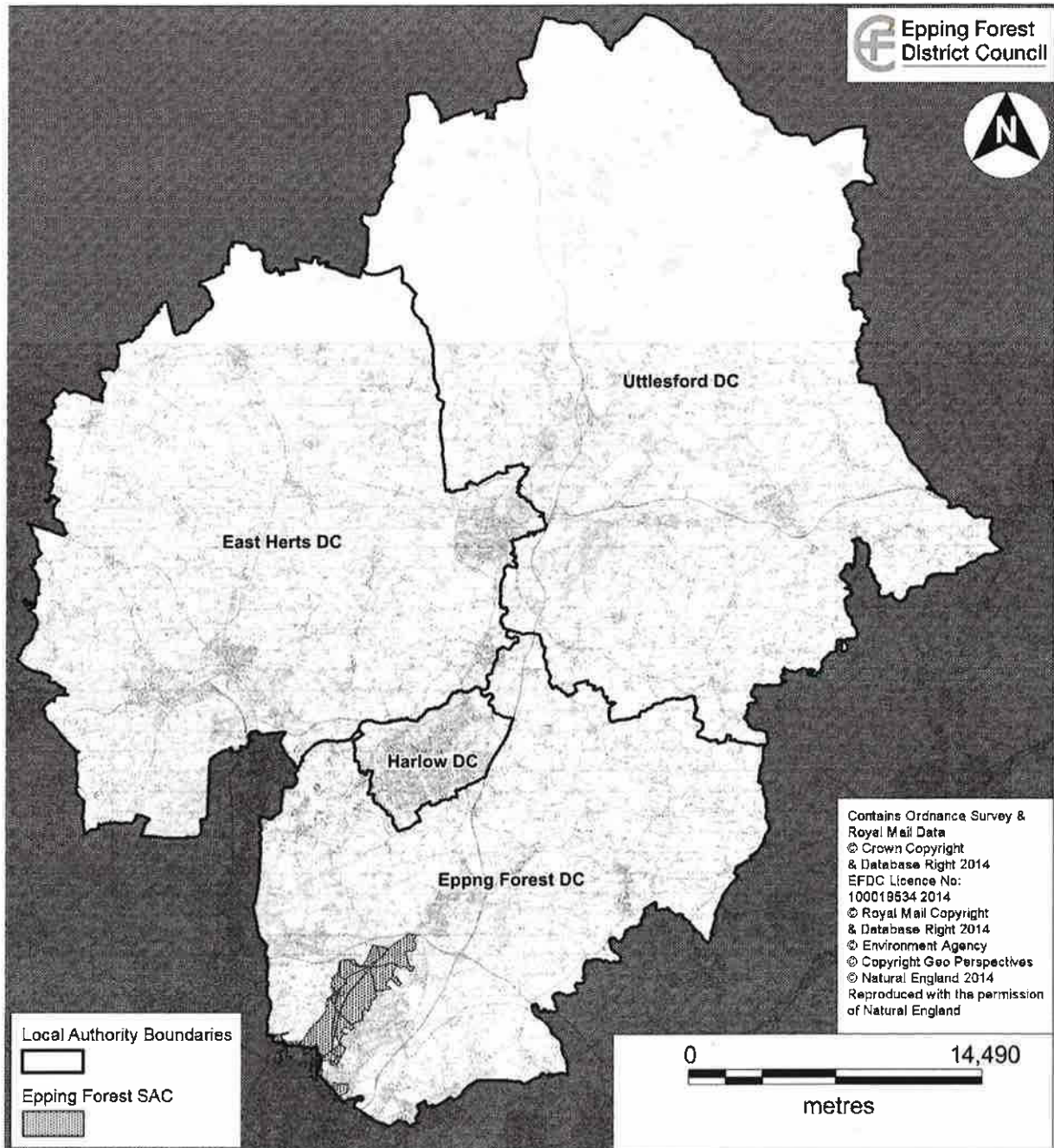
City of London Corporation

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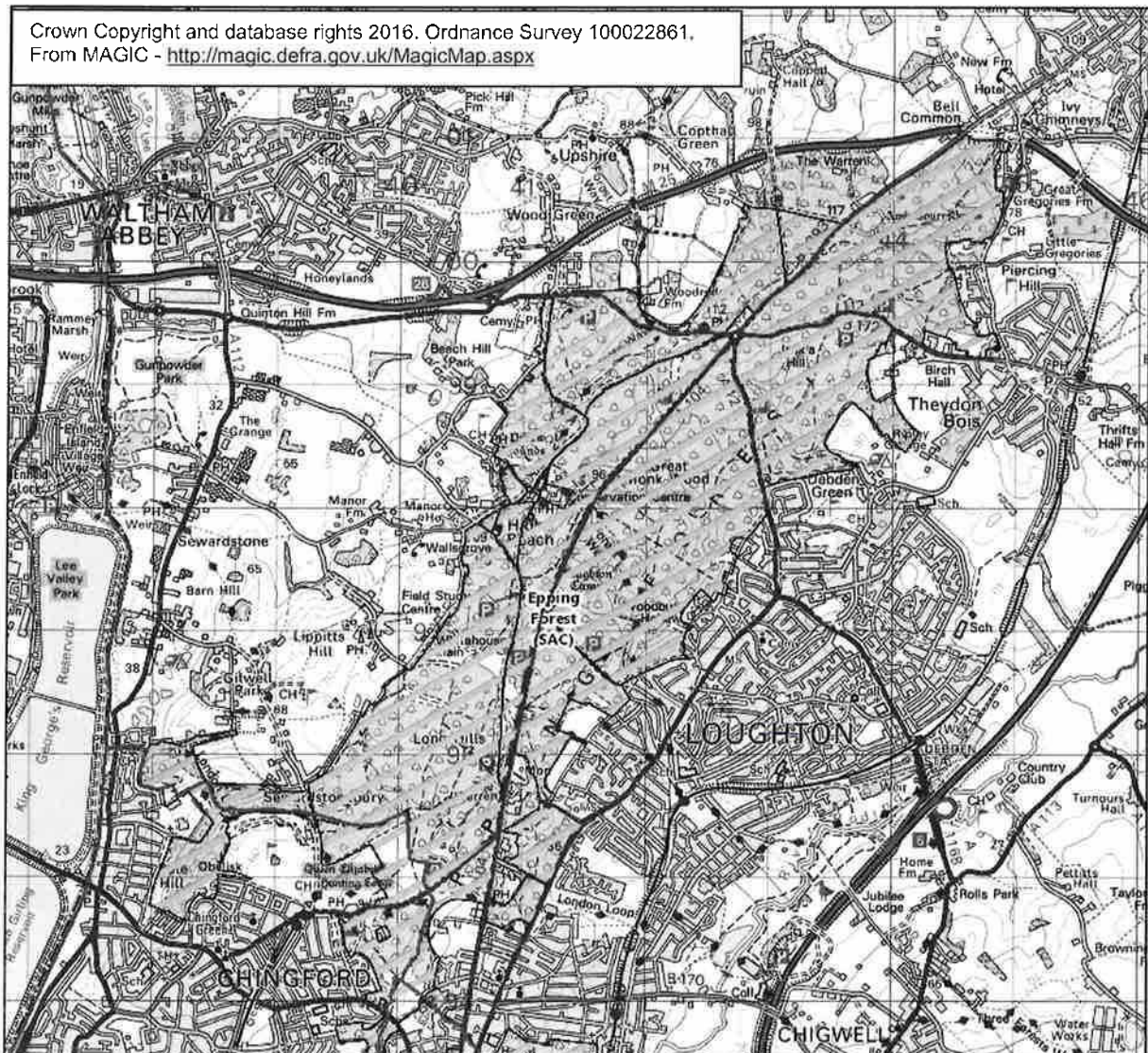
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Appendix 1 - The West Essex/East Herts area



Appendix 2 – Road links to be investigated around Epping Forest



Appendix 3 – Air quality predictive modelling method

- A3.1 The predictions of nitrogen deposition and annual mean NO_x concentrations for the proposed works will be based on the assessment methodology presented in Annex F of the Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)⁶ for the assessment of impacts on sensitive designated ecosystems due to highways works. Background data for the predictions for 2033 will be sourced from the Department of Environment, Food and Rural Affairs (Defra) background maps for 2011 projected forward to 2030 (2030 being the most advanced date in the future for which projections are currently available)⁷. Background data for 2030 would be used for the future assessment, with contributions from A-roads within the grid square removed from the background as this contribution was calculated using ADMS-Roads software. Background nitrogen deposition rates will be sourced from the Air Pollution Information System (APIS) website⁸. These rates will be reduced by 2% per year, as set out in HA207/07, to allow for the predicted improvements in background air quality over time as a result of ongoing national initiatives to improve emissions and the expected improvement in vehicle emissions over that period.
- A3.2 Annual mean concentrations of NO_x were calculated at 50m distances back from each road, with the closest distance being the closest point of the designated site to the road. Predictions were made using the latest version of ADMS-Roads using emission rates derived from the Defra Emission Factor Toolkit (version 6.0.2) which utilises traffic data in the form of 24-hour Annual Average Daily Traffic (AADT), detailed vehicle fleet composition and average speed. The end of the Local Plan period has been selected for the various future scenarios as this is the point at which the total emissions due to Local Plan traffic will be at their greatest.

⁶ Design Manual for Roads and Bridges, HA207/07, Highways Agency

⁷ Air Quality Archive Background Maps. Defra, 2013. Available from: <http://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html>

⁸ Air Pollution Information System (APIS) www.apis.ac.uk

Appendix E

Hertfordshire Infrastructure and Planning Partnership

Terms of Reference

(Amended following the HIPP meeting on 27 June 2016)

1. Objective

To provide a forum to discuss and, where appropriate, undertake a lobbying role and develop a shared view and agree joint work programmes on infrastructure and planning issues of common concern working co-operatively within Hertfordshire and across the county borders, including in respect of the development and review of the London Plan and other significant regional and sub regional strategies, according to the principles of localism and the duty to co-operate.

The Partnership will work together with Hertfordshire Forward, Hertfordshire Local Enterprise Partnership, the Local Transport Body for Hertfordshire, the Local Nature Partnership, other local authorities within the wider south east and other appropriate organisations, groups and partnerships in areas of shared interest to develop and where possible and necessary agree joint approaches to common issues. In particular the Partnership will work together to develop and maintain a shared Strategic Planning Framework for the County that will be consistent with the proposals of each constituent local authority and will set out the broad strategic direction and infrastructure needs of Hertfordshire. In a similar way the partnership will seek to provide a forum for challenging the priorities and proposals of the strategic economic plan, and any future reviews, ensuring that it is aligned with the strategic planning framework and local plans, and has political support. It will also take a lead role in progressing work around Devolution and the development of shared services.

The Chairman, or their deputy, will represent the Partnership as appropriate on external bodies, including the Board of the Local Transport Body for Hertfordshire.

The Partnership will not be a formal decision making-body and will not fetter the decision making processes of individual authorities. If individual authorities come to a different view from any collective Hertfordshire position they will ensure that all the other authorities are duly notified.

2. Membership

All eleven Hertfordshire local authorities.

The names of the accredited voting Member (and substitute) for each Authority should be registered with the Chairman of the Hertfordshire Planning Group. Accredited voting members and substitutes will be eligible to attend meetings.

Hertfordshire Local Enterprise Partnership (LEP) and other appropriate outside bodies will be invited to attend to speak where appropriate but will not be able to vote. There is a permanent invitation for Hertfordshire LEP to attend and participate at HIPP meetings.

3. Chairman and Vice Chairman

A Chairman and Vice Chairman will be elected annually at the first meeting of the municipal year.

4. Venues

Meetings will normally be held at County Hall, Hertford but any HIPP Member may host a meeting if they wish. The host authority will be responsible for organising the meeting room and refreshments.

5. Officer support

For partnership meetings, officers of individual authorities will be expected to provide support and briefings for their own Member representatives.

There is an expectation that officers from all authorities will actively contribute to delivery of the work programme and any other actions of the Partnership.

Secretariat support will be provided by the Hertfordshire Planning Co-ordinator, in liaison with the Chairman of the Hertfordshire Planning Group, who will be responsible for:

- Organising venues.
- Drafting agendas (which will be circulated, with any necessary papers, at least 7 days in advance of the meeting). If an individual authority wishes a specific item to be on the agenda they should notify the Hertfordshire Planning Co-ordinator at least 10 days in advance of the meeting.
- Ensuring that papers are drafted.
- Organising presentations.
- Drafting, circulating and finalising the minutes of the meetings.
- Actioning any collective decisions made by the Partnership.

6. Meetings

Each meeting will be Chaired by the elected Chairman, or the Vice Chairman in their absence. If neither the Chairman nor Vice Chairman is present a Chairman for that meeting will be elected by those present.

For a quorum there must be at least 6 voting Members present representing separate local authorities. However where a quorum is not present provisional decisions may be made for circulation to non attending Members

for their approval. The relevant decision will then become effective once a majority of HIPP Members, when added to those who attended the meeting and supported the decision, have confirmed their agreement.

If a vote is taken it will be by a show of hands and each local authority will have one vote. This can only be exercised by an accredited Member (or substitute Member) as nominated by that authority.

Decisions will be taken on a majority view of those eligible to vote where a unanimous view cannot be reached following reasonable debate. Any authority that disagrees with a vote will have the opportunity to present a minority report. Recorded votes shall be held if requested by at least one authority.

The Chairman will not have a casting vote.

The order of business shall be as indicated on the Agenda, or as otherwise prescribed by the Chairman.

The Chairman will control the conduct of the meeting. There will be no time limit on speeches and the number of times that individuals can speak. The Chairman will though use discretion to ensure that meetings are conducted in an open, transparent and constructive manner and will act impartially in seeking all views and summarising the views of those present prior to any vote.

The ruling of the Chairman on any point of order shall be final.

The meetings will not be open to the public or press.

Draft minutes will be circulated to each authority for comments within 7 days of the meeting. The subsequently amended minutes of the previous meeting will be circulated with the agenda for the next meeting and will be discussed and agreed at the start of each meeting.

7. Agreement of Terms of Reference

The terms of reference will be reviewed and revised by the Partnership as necessary.

Appendix F

AMENDED DRAFT JAN 2015

HERTFORDSHIRE INFRASTRUCTURE & PLANNING PARTNERSHIP

MEMORANDUM OF UNDERSTANDING

Hertfordshire Infrastructure & Planning Partnership (HIPP)

This memorandum of understanding has been developed by the Hertfordshire Infrastructure and Planning Partnership that comprises all local authorities in Hertfordshire, namely:

- Broxbourne Borough Council
- Dacorum Borough Council
- East Hertfordshire District Council
- Hertsmere Borough Council
- North Hertfordshire District Council
- St Albans City & District Council
- Stevenage Borough Council
- Three Rivers District Council
- Watford Borough Council
- Welwyn Hatfield Borough Council
- Hertfordshire County Council

HIPP & Supporting Officer Structure

HIPP meets approximately six times a year and is comprised of senior Councillors, usually the Planning Portfolio Holders, from Hertfordshire's District and Borough Councils and the County Council. It is supported by an officer group, the Hertfordshire Planning Group (HPG), which is made up of the Heads of Planning of each local authority. HPG acts as the implementation arm of HIPP and is in turn supported by a number of sub groups, task and finish groups and associated partnerships. These include HPG Development Plans, HPG Development Management, Hertfordshire Economic Development Group (HEDOG) and the Landscape & Green Infrastructure Group.

Purpose

This memorandum of understanding seeks to establish a framework for co-operation between the eleven local authorities that comprise the Hertfordshire Infrastructure & Planning Partnership (HIPP) and for the partnership to engage with other relevant organisations, both within Hertfordshire and beyond the county boundary. It particularly relates to strategic planning and infrastructure issues and consequently enables the partnership to agree joint approaches to common issues that impact on

more than one local authority district. The framework also reflects how HIPP will work together with other appropriate bodies including Hertfordshire Forward, Hertfordshire Local Enterprise Partnership, the Local Transport Body for Hertfordshire, the Local Nature Partnership, the Hertfordshire Association of Parish and Town Councils, Infrastructure providers and organisations based beyond the Hertfordshire boundary. The memorandum reflects the principles of localism and the duty to co-operate as enshrined in Section 110 of the Localism Act 2011.

This memorandum of understanding also seeks to establish a process to raise awareness of possible areas of conflict at an early stage. It is one of a series of documents and initiatives that establishes a direction of travel to ensure more effective and collaborative strategic planning across Hertfordshire. It is the cumulative effect of this joint and collaborative work that is intended to assist HIPP members in meeting their duty to co-operate obligations.

Status of this Document

This memorandum of understanding is a statement of intent that seeks to support effective co-operative working amongst the Hertfordshire local authorities. It is not intended to be legally binding and recognises that there will not always be full agreement on strategic planning and infrastructure issues across the HIPP authorities.

Objectives

This Memorandum has the following broad objectives:

- To provide a framework through which HIPP members will commit to engaging constructively, actively and on an ongoing basis both with each other and other public bodies and private sector interests including the Hertfordshire Local Enterprise Partnership (LEP), Hertfordshire Forward, Hertfordshire Local Nature Partnership (LNP), the Local Transport Body for Hertfordshire (LTB), the Hertfordshire Association of Parish and Town Councils (HAPTC) and Infrastructure providers on matters relating to strategic planning, strategic infrastructure and other activities that prepare the way for sustainable development;
- To provide a means by which HIPP can collectively and individually engage with the Greater London Authority and neighbouring counties and sub regional groupings on matters relating to sustainable development;
- Whilst recognising that individual HIPP Members have a duty to continue to act in the best interests of their localities and constituents provide the

opportunity to work collaboratively across local boundaries on issues of broader strategic importance;

- To facilitate the achievement of a broad, co-ordinated but consistent approach to strategic spatial planning, development and strategic infrastructure issues across Hertfordshire that recognises the differing characteristics, constraints and environmental considerations that exist across the County but that seeks to address the needs of business and local communities;
- To provide an opportunity for individual HIPP members to work jointly to meet development requirements that cannot wholly be met within their own areas;
- To enable a sharing of information and views and, where appropriate, to facilitate joint working on strategic issues which affect more than one local authority area;
- To ensure that the local planning, development and infrastructure policies prepared by each local authority are, where appropriate, informed by the views of other local authorities in Hertfordshire;
- To ensure that decisions on major planning applications, which have effects across more than one local authority area, are informed by the views of other Hertfordshire local authorities; and
- Provide a forum for HIPP members to discuss, debate and resolve potential areas of conflict at the earliest possible opportunity.

Strategic Planning & Infrastructure Issues

HIPP will jointly:

- Work to develop and maintain a Strategic Planning Framework that provides a broad strategic direction for Hertfordshire without imposing top-down targets on the scale or location of new development and that recognises the unique characteristics and different priorities of each constituent district and area;
- Seek input from key partners, in particular the Hertfordshire LEP, Hertfordshire LNP and the Hertfordshire LTB, in relation to the development, implementation and monitoring of the Strategic Planning Framework;
- Provide a forum for challenging the priorities and proposals of the strategic economic plan and any future reviews, ensuring that it is aligned with the strategic planning framework and local plans, and has political support.
- Identify areas for inter-authority co-operation on strategic issues, including the preparation of joint local development documents;
- Explore opportunities for sharing expertise and developing joint research/evidence with the LTB, LEP and LNP.
- Seek to co-ordinate land use planning functions and align adopted local plans, including the use of local development orders, across local authorities within the HIPP and LEP area;

- Adopt a flexible approach to joint work, recognising that the County may not always be the appropriate geography for all partnership activity;
- Develop and implement a programme of joint research aimed at producing a robust evidence base and for jointly addressing strategic planning and development issues, particularly, but not exclusively, those referred to in the National Planning Policy Framework (para 156);
- Prepare and jointly seek funding for a strategic infrastructure investment programme to meet the existing needs of Hertfordshire and address the future social, economic and environmental requirements of growth; and
- Maintain effective liaison and joint working arrangements with the LEP, Hertfordshire Forward, LNP, LTB and other public and private sector interests as appropriate.

Each Member of HIPP will also notify the Chairman of HIPP, and where appropriate report to a meeting of HIPP, any issue that in their view could potentially have an adverse impact on partnership working or the effective operation of this memorandum of understanding.

Policy Documents

Each member of HIPP will:

- Through the Chair of the Hertfordshire Planning Group Development Plans Officer Group (HPGDP) notify all HIPP local authorities at each consultation stage in the preparation of its local development documents or, in the case of the County Council, its local transport plan, or other relevant policy documents, and any documents associated with them;
- Through the Chair of HPGDP notify all HIPP local authorities of consultation on any other policy document which, in its view, would have a significant impact on strategic planning or development within Hertfordshire; and
- If requested, meet with and discuss any issues raised by one or more of the other HIPP local authorities and take into account any views expressed on those issues.

Development Management

Each member of HIPP will:

- Through their representative on the Hertfordshire Planning Group Development Management Group (HPGDM) notify all HIPP local authorities of any major planning applications, from within its area or on which it is consulted by a local authority from outside its area, which would, in its view,

have a significant impact on the strategic planning and development of Hertfordshire; and

- Take into account any views expressed in determining the application.

Monitoring

The operation and implementation of this Memorandum of Understanding will be managed and monitored through the HIPP Work Programme and will be reviewed on at least an annual basis through the HIPP Annual Review. Updates and amendments to be document will be issued as appropriate.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 13 OCTOBER 2016

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DISTRICT PLAN – INTERIM CONSULTATION STATEMENT

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members an Interim Consultation Statement and to seek agreement to include this as a companion document to the East Herts District Plan Pre-Submission Version, 2016, for consultation purposes.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the Interim Consultation Statement, as detailed at Essential Reference 'B' to the report submitted, be agreed as a companion document to the East Herts District Plan, Pre-Submission Version, 2016, for consultation purposes.

1.0 Background

1.1 The East Herts District Plan sets out the Council's planning framework for the district. Once adopted, the policies in the District Plan will replace the policies in the Local Plan 2007. It covers the period 2011–2033.

1.2 A Consultation Statement has been prepared, currently in interim form, in order to comply with the requirements of Regulation 19 and Regulation 22 (1) part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.3 This report details the contents of the proposed Interim Consultation Statement to accompany the East Herts District

Plan, Pre-Submission Version, and seeks agreement of this document for such a purpose.

2.0 Report

2.1 As detailed above, an Interim Consultation Statement has been prepared in order that the Council may comply with the requirements of Regulation 19 and Regulation 22 (1) part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (referred to throughout the Consultation Statement as ‘the Regulations’).

2.2 In detailing what the requirements for the ‘Submission of documents and information to the Secretary of State’ are, Regulation 22 (1) part (c) directs the Council to prepare a statement which sets out:

- i. which bodies and persons were invited to make representations under Regulation 18 of the Local Planning Regulations;
- ii. how those bodies were invited to make representations;
- iii. a summary of the main issues raised in those representations;
- iv. how those main issues have been taken into account;
- v. if there are representations made under Regulation 20, the number made and a summary of the main issues raised in those representations; and
- vi. if there are no representations made under Regulation 20, that no such representations were made.

2.3 It should be noted that, as the Council is about to undertake the Regulation 19 consultation stage, it is currently only possible to produce a Consultation Statement which covers points i. to iv. It is therefore proposed that an Interim document be produced at this time and that a final Consultation Statement be prepared once the Council is in a position to include reference to points v. and vi., which will occur post-Pre-Submission Consultation. A reproduction of Regulations 18 to 22 is produced at Appendix A to the Consultation Statement.

2.4 The draft Interim Consultation Statement is included at **Essential Reference 'B'** to this report and Members are invited to agree the document as a companion document to the East Herts District Plan, Pre-Submission Version, 2016, for consultation purposes.

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

Previous District Planning Executive Panel reports are all available at:
<http://democracy.eastherts.gov.uk/mgCommitteeDetails.aspx?ID=151>

Contact Member: Cllr Linda Haysey – Leader of the Council
linda.haysey@eastherts.gov.uk

Contact Officer: Kevin Steptoe – Head of Planning and Building Control
01992 531407
kevin.steptoe@eastherts.gov.uk

Report Author: Kay Mead – Principal Planning Officer
kay.mead@eastherts.gov.uk

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	Public consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Pre-Submission District Plan in general will have positive impacts on health and wellbeing through a range of policy approaches that seek to create sustainable communities.

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Interim Consultation Statement

October 2016

EAST HERTS DISTRICT PLAN, REGULATION 19, INTERIM CONSULTATION STATEMENT

1. Introduction

- 1.1 This Consultation Statement describes the processes followed by East Herts Council in undertaking community participation and stakeholder involvement in the production of the East Herts District Plan (Pre-Submission Version) and sets out how the main issues raised through consultation have helped shape the Plan. The Consultation Statement has been prepared to comply with the requirements of Regulation 19 and Regulation 22 (1) part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (referred to throughout this Consultation Statement as ‘the Regulations’). The Consultation Statement will assist the Inspector at the Examination in Public to determine whether the processes that the Council followed leading to the Submission of the District Plan comply with government guidance and requirements for public participation.
- 1.2 In detailing what the requirements for the ‘Submission of documents and information to the Secretary of State’ are, Regulation 22 (1) part (c) directs the Council to prepare a statement which sets out:
- i. which bodies and persons were invited to make representations under Regulation 18 of the Local Planning Regulations;
 - ii. how those bodies were invited to make representations;
 - iii. a summary of the main issues raised in those representations;
 - iv. how those main issues have been taken into account;
 - v. if there are representations made under Regulation 20, the number made and a summary of the main issues raised in those representations; and
 - vi. if there are no representations made under Regulation 20, that no such representations were made.
- 1.3 The District Plan has currently reached the Regulation 19 stage; therefore, this Interim Consultation Statement is restricted to covering points i. to iv and the sections following detail how the Council has complied with its obligations for each criterion. It is intended that the Consultation Statement will be revised, post-Regulation 19 consultation stage, to reflect whether or not any representations are made under Regulation 20, thus complying with criteria v. and vi. detailed above. An excerpt of the Regulations covering 18 to 22 is included at Appendix A to this Consultation Statement.

1.4 In carrying out its consultation processes, it should be noted that, in addition to complying with the Regulations, the Council has also complied with the provisions of its Statement of Community Involvement (SCI), October 2013. This document sets out the Council's approach to public engagement in the planning system and how it seeks to involve the local community in East Herts. The SCI may be viewed at: <http://www.eastherts.gov.uk/sci>.

2.0 Who Was Consulted

(i) Bodies and Persons invited to make representations under Regulation 18

2.1 The Council has consulted extensively at each stage of the preparation of the District Plan. This Consultation Statement is concerned with the approach taken at the Regulation 18 stage i.e. Preferred Options consultation.

2.2 To aid the consultation process, the Council maintains a live consultee database, which is stored on the Objective system. The database is continuously updated at each consultation event and as and when notified of changes by consultees.

2.3 In addition to Specific and General Consultees (as identified under Part 1 of the 'Regulations'), all consultees on the Objective database (i.e. those interested parties who had previously commented and/or expressed an interest in being notified) were contacted by means of email or letter, as appropriate. The Council's Objective database currently consists of over 3,000 persons, bodies and groups.

2.4 Additionally, every household in the district was individually notified of the consultation (see more below).

2.5 The Council has also carried out comprehensive ongoing formal and informal Duty to Co-operate discussions with various Councils, organisations and stakeholders, which has helped to inform the preparation of the plan. The Duty to Co-operate Statement shows how these requirements have been met in more detail.

3.0 How we consulted

(ii) How those bodies and persons were invited to make representations

3.1 The Preferred Options consultation (Regulation 18) was carried out for a 12 week period between 27th February and 22nd May 2014.

3.2 All Specific, General and other consultees on the Objective database (i.e. those interested parties who had previously commented and/or expressed an interest in being notified) were contacted by means of email or letter, with

relevant documents provided, as appropriate. A full list of those notified of the consultation is included at Appendix B to this Consultation Statement.

- 3.3 Hard copies of the full suite of consultation documents were made available at the Council's Offices, Town Council Offices, leisure centres and libraries.
- 3.4 To ensure widespread awareness of the consultation, the Council arranged for every household in the district to be delivered with a full colour A3 folded leaflet containing headlines of the development strategy and details of how to access hard and electronic copies of the full suite of consultation documents. Where gaps in delivery were identified, monitored follow-up deliveries were arranged.
- 3.5 An article also featured prominently in the Council's Link magazine to further raise awareness and this was delivered to properties with their Council Tax notifications. The magazine also benefited from reaching a further audience through its wider distribution.
- 3.6 A poster was produced in A3 and A4 formats and this was distributed to all Town and Parish Councils, libraries, local schools and local supermarkets for display on community notice boards.
- 3.7 All documents were made available on the Council's website, where the homepage advertised the consultation for its duration.
- 3.8 Following press releases a number of articles were published in the local press discussing the consultation.
- 3.9 Twitter and Facebook announcements were sent out, along with email notifications to all those registered on the consultation portal and on the Council's Stay Connected service.
- 3.10 The Council's District Plan Bulletin, which detailed the consultation as part of its contents, was distributed by email to Town and Parish Councils and all those parties who had registered an interest in receiving this communication through the consultation portal.
- 3.11 Meetings were held with the East Herts Association of Parish and Town Councils and attendees were invited to encourage local residents to engage in the consultation process.
- 3.12 A series of 25 public engagement meetings were held (see Appendix C for full details) which enabled members of the public and local groups to receive

presentations, view consultation material, and raise questions with officers and relevant members regarding the draft District Plan.

- 3.13 A structured telephone opinion survey was undertaken by an Opinion Research Organisation across a representative sample of 1,000 of the District's residents. This sought to reach a cross section of the local community across the district to explore opinions on future development and Draft District Plan.
- 3.14 Internal staff briefings were held with Council officers from all departments to increase awareness of the consultation and the content of the Draft District Plan.
- 3.15 Respondents to the Preferred Options Consultation were encouraged to comment directly via the Objective Consultation Portal (which allowed the user to interrogate the documents and post comments electronically and directly attribute them to specific paragraphs or policies within the document), but were also able to make comments via email, post or hand delivery at the Council's offices.

4.0 How we responded

(iii) & (iv) Summary of the main issues raised by the representations and how these have been taken into account

- 4.1 All issues relating to relevant planning matters within representations were summarised by Officers and reported to Members of the District Planning Executive Panel over a series of meetings along with an Officer Response, which detailed whether or not it was considered appropriate that a consequential amendment to the Plan be made. The final published East Herts District Plan Pre-Submission version reflects the Panel's agreed position in respect of the consideration of the Issues raised.
- 4.2 Responses to issues raised in respect of individual chapters¹ through the Preferred Options Consultation were considered at the following District Planning Executive Panel meetings:

¹ N.B. Some renumbering and renaming of chapters has occurred in the intervening period since the Preferred Options consultation in 2014. Where this is the case, the former title/number is included in brackets and italics.

Chapter Number	Chapter Title	Meeting Date Where Issues Raised Through Regulation 18 Consultation Were Considered
1	Introduction	21 July 2016
2	Vision and Strategic Objectives	21 July 2016
3	Development Strategy	25 August 2016
4	Green Belt and Rural Area Beyond the Green Belt	25 August 2016
5	Bishop's Stortford	8 September 2016
6	Buntingford	25 August 2016
7	Hertford	21 July 2016
8	Sawbridgeworth	21 July 2016
9	Ware	21 July 2016
10	Villages	15 September 2016
11 (12)	The Gilston Area	21 July 2016
12	East of Stevenage	Did not form part of the Preferred Options consultation
13 (11)	East of Welwyn Garden City	21 July 2016
14 (13)	Housing	25 August 2016
15 (14)	Economic Development (<i>Economy</i>)	21 July 2016
16 (15)	Retail and Town Centres	24 May 2016
17 (16) and (20)	Design and Landscape (<i>Design</i>) and (<i>Landscape</i>)	24 May 2016
18 (17)	Transport	24 May 2016
19 (18)	Community Facilities, Leisure and Recreation	21 July 2016
20 (19)	Natural Environment	24 May 2016
21	Heritage Assets	24 May 2016
22	Climate Change	24 May 2016
23	Water	24 May 2016
24	Environmental Quality	24 May 2016
25	Delivery and Monitoring (<i>Delivery</i>)	25 August 2016
Appendices	Appendices	15 September 2016

4.3 Links to the District Planning Executive Panel agenda papers referred to above are provided below:

25 May 2016:

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2953&Ver=4>

21 July 2016:

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2951&Ver=4>

25 August 2016:

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2952&Ver=4>

8 September 2016:

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=3028&Ver=4>

15 September 2016:

<http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2953&Ver=4>

- 4.4 Details of those people and organisations who responded to the Preferred Options consultation are available on the Council's website at Appendix D.

5 Conclusion

- 5.1 In carrying out its consultation processes, the Council considers that it has complied both with the Regulations and with the provisions of its Statement of Community Involvement (SCI). It should be noted that this document is an Interim version of the Consultation Statement, which will be updated post-Regulation 19 consultation.

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Appendix A: Town and Country Planning (Local Planning) (England) Regulations 2012

Regulations 18 to 22

Preparation of a local plan

18.—(1) A local planning authority must—

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and
- (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

Publication of a local plan

19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

Representations relating to a local plan

20.—(1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.

(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.

(3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.

Conformity with the London Plan

21.—(1) A local planning authority which are a London borough council must make a request under section 24(4)(a) of the Act on the day they comply with regulation 19(a).

(2) Where a request is made under section 24(4)(a) of the Act, the Mayor must send the opinion sought to the Secretary of State and the local planning authority within 6 weeks from the day on which the request is made.

Submission of documents and information to the Secretary of State

- 22.—(1) The documents prescribed for the purposes of section 20(3) of the Act are—
- (a) the sustainability appraisal report;
 - (b) a submission policies map if the adoption of the local plan would result in changes to the adopted policies map;
 - (c) a statement setting out—
 - (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
 - (ii) how those bodies and persons were invited to make representations under regulation 18,
 - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
 - (iv) how any representations made pursuant to regulation 18 have been taken into account;
 - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - (vi) if no representations were made in regulation 20, that no such representations were made;
 - (d) copies of any representations made in accordance with regulation 20; and
 - (e) such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.
- (2) Notwithstanding regulation 3(1), each of the documents referred to in paragraph (1) must be sent in paper form and a copy sent electronically.
- (3) As soon as reasonably practicable after a local planning authority submit a local plan to the Secretary of State they must—
- (a) make available in accordance with regulation 35—
 - (i) a copy of the local plan;
 - (ii) a copy of each of the documents referred to in paragraph (1)(a), (b) and (c);
 - (iii) any of the documents referred to in paragraph (1)(d) or (e) which it is practicable to so make available, and
 - (iv) a statement of the fact that the documents referred to in sub-paragraphs (i) to (iii) are available for inspection and of the places and times at which they can be inspected;
 - (b) send to each of the general consultation bodies and each of the specific consultation bodies which were invited to make representations under regulation 18(1), notification that the documents referred to in paragraphs (a)(i) to (iii) are available for inspection and of the places and times at which they can be inspected; and
 - (c) give notice to those persons who requested to be notified of the submission of the local plan to the Secretary of State that it has been so submitted.

Regulation 18 Consultation Meetings and Presentations

Date	Time	Venue	Type of Meeting	Audience
25-Feb-14	7.30pm	Standon Village Hall	Standon Parish Council Meeting	Public
27-Feb-14	7.30pm	Brickendon Village Hall - Fanshaws Room, Brickendon Lane	Brickendon Liberty Parish Council Meeting	Public
01-Mar-14	9.30am to 1pm	Sawbridgeworth Town Council, Sayesbury Manor, Bell Street	Drop-in session – Staffed	Public
04-Mar-14	8.00pm	Datchworth Village Hall, Datchworth Green	Parish Councillors only	Members Only
17-Mar-14	7.30pm	Hunsdon Village Hall, 45 High Street, Hunsdon	Presentation, Q&A	Public
17-Mar-14	6.30pm	Simon Balle School	Fly on the Wall	Public
19-Mar-14	8.00pm	Hertford Catholic Church - Hertford Civic Society	Hertford Civic Society only	Members Only
20-Mar-14	11.25am	Chauncy School	Presentation to 6th Form Geography Students	School Students
25-Mar-14	8.00pm	Datchworth Village Hall, Datchworth Green	Presentation, Q&A	Public
27-Mar-14	7.00pm	Hertford Town Council, Hertford Castle - Annual Town Meeting	Presentation, Q&A	Public
31-Mar-14	7.00pm	Bishop's Stortford Town Council, Windhill	Town Councillors only	Members Only
31-Mar-14	7.00pm	Ware Town Council Annual Town Meeting, The Priory	Presentation, Q&A	Public
01-Apr-14	7.00pm	Buntingford - Seth Ward Community Centre, Luyes Rise	Presentation, Q&A	Public
03-Apr-14	7.30pm	Brickendon - Fanshaws Room, Brickendon Lane	Presentation, Q&A	Public
05-Apr-14	9.30am to 1.00pm	Sawbridgeworth - Sayesbury Manor, Bell Street	Drop-in session – Staffed	Public
07-Apr-14	7.00pm	Tewin - Tewin Memorial Hall, Lower Green Road	Presentation, Q&A	Public
09-Apr-14	7.30pm	Nigel Copping Community Centre, Stanstead Abbots	Presentation, Q&A	Public
10-Apr-14	8.00pm	Braughing - St Mary's Church Hall, Church End	Braughing APM, Presentation, Q&A	Public
14-Apr-14	7.30pm	Sawbridgeworth Town Council, Sayesbury Manor, Bell Street	Annual Town Meeting	Public
15-Apr-14	7.30pm	Buntingford - Benson Hall, Station Road	Buntingford Civic Society	Members Only
16-Apr-14	7.30pm	High Wych Memorial Hall, High Wych Road	Presentation, Q&A	Public
17-Apr-14	7.30pm	Cottered Village Hall	Presentation, Q&A	Public
25-Apr-14	8.00pm	Amwell Society	Presentation, Q&A	Members Only
26-Apr-14	1pm to 4pm	Bishop's Stortford, Charris Centre	Drop-in session – Staffed	Public
29-Apr-14	7.30pm	Little Hadham Village Hall	Presentation, Q&A	Public

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Appendix C – Regulation 18 Consultees

Specific Consultation Bodies

- Anglian Water
- British Waterways
- Communication Operators (including; British Telecommunications plc, Hutchinson 3G UK Limited, Orange Personal Communications Services, T-Mobile, Telefonica O2 UK Ltd, Vodafone)
- Department for Transport Rail Group
- East and North Hertfordshire NHS Trust
- East of England Development Agency
- East of England Local Government Association
- East of England Regional Office
- English Heritage (now Historic England)
- Environment Agency
- Government Office for the East of England
- Greater Anglia
- Hertfordshire Constabulary
- Hertfordshire County Council
- Hertfordshire Highways
- Hertfordshire Local Enterprise Partnership
- Highways Agency (now Highways England)
- Homes and Communities Agency
- Lee Valley Regional Park Authority
- Mobile Operators Association
- National Grid
- Natural England
- Neighbouring Authorities (including; Broxbourne Borough Council, Epping Forest District Council, Essex County Council, North Hertfordshire District Council, Harlow District Council, Stevenage Borough Council, Uttlesford District Council, Welwyn Hatfield Borough Council)
- Network Rail
- NHS East of England
- NHS Hertfordshire
- NHS West Essex
- Other Hertfordshire Authorities (including; Dacorum Borough Council, Hertsmeare Borough Council, St Albans District Council, Three Rivers District Council, Watford Borough Council)
- Thames Water
- The Coal Authority
- The Princess Alexandra Hospital NHS Trust
- Veolia Water

East Herts Town and Parish Councils	
Bishop's Stortford Town Council	Hertford Heath Parish Council
Buntingford Town Council	Hertingfordbury Parish Council
Hertford Town Council	High Wych Parish Council
Sawbridgeworth Town Council	Hormead Parish Council
Ware Town Council	Hunsdon Parish Council
Albury Parish Council	Little Berkhamsted Parish Council
Anstey Parish Council	Little Hadham Parish Council
Ardeley Parish Council	Little Munden Parish Council
Aspenden Parish Council	Much Hadham Parish Council
Aston Parish Council	Sacombe Parish Meeting
Bayford Parish Council	Standon Parish Council
Bengeo Rural Parish Council	Stanstead Abbots Parish Council
Benington Parish Council	Stanstead St Margarets Parish Council
Bramfield Parish Council	Stapledford Parish Council
Braughing Parish Council	Stocking Pelham Parish Council
Brent Pelham & Meesden Parish Council	Tewin Parish Council
Brickendon Liberty Parish Council	Thorley Parish Council
Buckland and Chipping Parish Council	Thundridge Parish Council
Cottered Parish Council	Walkern Parish Council
Datchworth Parish Council	Wareside Parish Council
Eastwick & Gilston Parish Council	Watton-at-Stone Parish Council
Furneux Pelham Parish Council	Westmill Parish Council
Great Amwell Parish Council	Widford Parish Council
Great Munden Parish Council	Wyddial Parish Meeting

Other Town and Parish Councils	
Hatfield Town Council	Nazeing Parish Council
Ayot St Lawrence Parish Meeting	Northaw & Cuffley Parish Council
Ayot St Peter Parish Council	Nuthampstead Parish Meeting
Barkway Parish Council	Reed Parish Council
Barley Parish Council	Roydon Parish Council
Berden Parish Council	Rushden & Wallington Parish Council
Birchanger Parish Council	Sandon Parish Council
Clavering Parish Council	Sheering Parish Council
Codicote Parish Council	Stansted Mountfitchet Parish Council
Essendon Parish Council	Stansted Parish Council
Farnham Parish Council	Therfield Parish Council
Great Hallingbury Parish Council	Welwyn Parish Council
Langley Parish Council	Weston Parish Council
Little Hallingbury Parish Council	
Manuden Parish Council	

General Consultation Bodies and Other Organisations

(BRB) Residuary Ltd
1096 (Bishop's Stortford) Sqn ATC
1st Hertford Scout Group
Abel Smith School
Abron Ltd
ACERT
ACRE
ACW International
Adam & Eve Service Station
Adlington (Gladman Care Homes Limited)
Advance Housing
Affinity Sutton Group
Age UK Hertfordshire
Albury Acorns Pre School
Albury C of E (VA) Primary School
Aldwyck Housing Group Ltd
All Nations Christian College
All Saints C of E (VA) Primary School
All Saints C of E Primary and Nursery School
All Saints Church (Bishop's Stortford)
All Saints Church (Datchworth)
All Saints Church (Hertford)
Altamira (UK) Ltd
Amwell View School
Anchor Trust
Andrew Martin Associates
Angels at Play
Anstey First School
Ardeley St Lawrence C of E (VA) Primary School
Arriva the Shires and Essex
ASDA Stores Ltd
Ash Valley Children's Centre
Ashdene Residents Association
Ashley Godfrey Associates
Aston Pre-School
Aston St Mary's C of E (Aided) Primary School
Aston Village Society
B.J.Ashpole Ltd
BAA Stansted
Banner Homes
Barton Willmore
Bayford Action Group
Bayford C of E VC Primary School

Bayfordbury Estates Ltd
Beane Valley Children's Centre
Beechwood Homes
Bellway Homes
Bellwinch Homes
Belview Homes
Bengeo Playgroup
Bengeo Primary School
Benington C of E Primary School
Benington Nursery
Berkeley Homes (Three Valleys) Ltd
Birchanger HR Solutions
Birchwood High School
Bishop's Park Playschool
Bishop's Park Residents Association
Bishop's Stortford Baptist Church
Bishop's Stortford Business Connections
Bishop's Stortford Chamber Of Commerce
Bishop's Stortford Christian Assembly
Bishop's Stortford Christian Assembly
Bishop's Stortford Civic Federation
Bishop's Stortford College
Bishop's Stortford Football Club
Bishop's Stortford Golf Club
Bishop's Stortford Mencap
Bishop's Stortford Methodist Church
Bishops Stortford Montessori Nursery
Bishop's Stortford Retailers Group
Bishop's Stortford Town Centre Management Partnership
Bloor Homes Eastern
Blues Pre School
Bluestone Planning Ltd
Bobtails Playgroup and Teddy Club
Bovis Homes Ltd
Braughing Playing Field Association Trust
Brendan Boyle Architects
Brian Barber Associates
Briggens Estate Ltd
British Horse Society
British Telecommunications plc
Broxbourne & East Herts CVS
Broxbourne Woods Area Conservation Society

Building Design Maintenance
Building Research Establishment
Bullworthy Shallish LLP
Buntingford Action for Responsible Development (BARD)
Buntingford Chamber of Commerce
Buntingford Civic Society
Buntingford Medical Centre
Buntingford Relief in Need Charity
Buntingford Town Partnership
Buntings Nursery
Busy Bees
Busy Bees (Hartham Park)
Busy Bees (Stanstead Abbots)
Busy Bees (Thorley Park)
Busy Bees Day Nursery (Bishops Stortford)
Busy Bees Pre School (Great Munden)
C C A Parkins & Sons
CABE
CALA Homes (South) Ltd
Cambrills Ltd
Carers in Hertfordshire
Carers in Hertfordshire, South East Team
Carillion plc
Castle Joinery
Castlegate Surgery
Catherine Place Ltd
CBI East of England
CDA for Herts
Cecil Close Residents Association
Central Surgery
Centrebus Ltd
CgMs Consulting
Chaldean Estate
Chantry Community Association
Childrens Nest Day Nurseries
Chips Saturday Club
Christ Church
Christ Church C of E (VA) Primary & Nursery School
Christ Church United Reformed Church
Christopher Fleming as trustee to the JC & LB Thompson Trust
Church Commissioners
Church Farm

Church Street Partnership
Church Street Surgery
Churchfields Children's Centre
Churchfields Kindergarten
Churchill Retirement Living Ltd
Circle Anglia
City & Country Group
City & Country Group Trustees Ltd
City & Country Residential Ltd
City & Provincial Properties PLC
Civil Aviation Authority
Clocktower
Coke Gearing Consulting
Colliers International
Collins Bros
Collins Farming Ltd
Commercial Estates Group
Commissions East
Community Church
Community Safety & Crime Reduction Department, Herts Constabulary
Connect Scaffolding
Considerate Constructors Scheme
Countryside Management Service
Countryside Properties
CPRE - The Hertfordshire Society
Crest Nicholson Eastern Regional Office
Crest Strategic Prospects Ltd
Crook Bros
Croudace Homes
Croudace Strategic Ltd
Crozier Hadley
D W Group Holdings Ltd
D. W. Properties Ltd
Datchworth Pre-School
David G Williamson & Co
David L Walker Limited
David Wilson Homes
Deloitte Real Estate
Derrick Wade Waters
Deville Estates
Diocese of St Albans
DLP Consultants
DLP Planning
Dolphin House Surgery
DPDS Consulting Group
Duckling Green Children's Centre

Ducklings Playgroup
Duncombe School
Easneye Farms
East Herts Archaeological Society
East Herts Citizens Advice Service
East Herts Council
East Herts DC engineers team
East Herts Gospel Hall Trust
East Herts Ramblers
East Herts YMCA
East of England Ambulance Service NHS Trust
EDF Energy Networks
Edgar Harman & Co Ltd
Edwinstree C of E Middle School
ELA Design
Emmanuel Shared Church
Essex County Cricket Board
Essex Wildlife Trust
European Land Holdings
Executors of J Bailey Dec'd
Exemplas Holdings Ltd
Fairfield Partnership
Fairview New Homes Ltd
Fawbert & Barnard Infants' School
Federation for Small Business
Fields In Trust
First Capital Connect
First Tower Trustees Limited
Forebury Estates Ltd
Forewind Ltd
Forgetrack Ltd
Foxholes Farm
Framptons
Frankland International Ltd
Freight Transport Association
Freman College
French & Jupps Ltd
Friends of Panshanger Park
Friends of the Hertfordshire Way
Friends, Families and Travellers and Traveller Law Reform Project
Frontier Developments Ltd
Furneux Pelham C of E School
Fusion Online Ltd
Garden History Society
Gascoyne Cecil Estates
George Wimpey North Thames

GL Hearn
Gladman Developments
GlaxoSmithKline
GLPF Six Ltd
Good Architecture/ Transition Hertford
Goring LLP
GQ Properties Ltd
Grain & Co. Property Consultants
Grange Builders
Granta Housing Society Ltd
Great Amwell Nursery School
Green Energy & Developments Ltd
Greene King PLC
Groundwork Hertfordshire
Grove Cottage Special Needs Nursery
Grove Residents Action Group
GSK
H A F Buxton
Haileybury School
Hall Needham Associates
Hallam Land Management Ltd
Hanbury Manor Creche
Hanover Housing Association
Hanscombe House Surgery
Harlow Renaissance Ltd
Hastoe Housing Association Ltd (East)
Havers Action Team
Hawksmoor Property Services
Hawkspur Ltd
Haymeads Residents' Association
Hayter Ltd
Hazel End Farm
HCA
Health and Safety Executive
Heath Mount School
Henderson Global Investors Limited
Hertford and District University Of The Third Age
Hertford Baptist Church
Hertford Civic Society
Hertford Disability Support Group
Hertford Gospel Hall Trust
Hertford Heath Primary School
Hertford Planning Service
Hertford Regional College
Hertford Selections Children's Centre
Hertford St Andrews C of E Primary School

Hertfordshire Action on Disability
Hertfordshire African & Caribbean Network
Hertfordshire Anglo-Scandinavian Society
Hertfordshire Association of Parish and Town Councils
Hertfordshire Biological Records Centre
Hertfordshire BME Partnership
Hertfordshire Building Preservation Trust
Hertfordshire Careers Services Ltd
Hertfordshire Chamber of Commerce & Industry
Hertfordshire Chinese Class Association
Hertfordshire Community Foundation
Hertfordshire Community Health Services
Hertfordshire Gardens Trust
Hertfordshire Partnership NHS Trust
Hertfordshire Police Authority
Hertfordshire Spanish Circle
Hertfordshire Tamil Senior Centre
Hertingfordbury Conservation Society
Hertingfordbury Cowper C of E (VA) Primary School
Herts & Middlesex Badger Group
Herts & Middlesex Wildlife Trust
Herts and Essex Mosques and Islamic Cultural Centre
Herts Sports Partnership
HertsAID
High Cross Joinery
High Wych C of E Primary School
Highfield Day Nursery
Highfield Nursery School
Hightown Praetorian and Churches Housing Association
Hillmead Primary School
HNJV Ltd
Hockerill Anglo-European College
Hockerill Residents Association
Hollybush Primary School
Hollybush Under Fives
Holy Cross Church
Holy Trinity Church (Hertford Heath)
Holy Trinity Church (Hunsdon)

Holy Trinity Church (Little Amwell)
Holy Trinity Church with St Leonards (Bengeo)
Home Builders Federation
Home Farm Trust Herts & Essex
Hormead C of E (VA) Primary School
Hormead Hares FC
Housing 21
HPG Stortford Ltd
Hubert & Leach Ltd
Hunsdon Ducklings
Hunsdon JMI School
Hythe Ltd
Ian Baseley Associates
Iceni Projects Ltd
IDA Nurseries
Immaculate Conception & St Joseph
J Chapman Esq
Jack Poulton & Sons Ltd
Jameson & Hill
Januaries Consultant Surveyors
Jehovah's Witnesses
Jenyns First School and Nursery
John Martin & Associates
Joint response on behalf of Landowners to the south west of Ware
Joseph Rochford Gardens Ltd
Jumping Jacks
Kickstart Trust (Bishops Stortford) Ltd
Kier Developments Ltd
Kier Homes
Kingshill Infant School
Kingsmead Pre School
Kirby Cove Architects
Kler Developments Ltd
Knight Developments Ltd
Knightsfield School
L.A. Packing Co Ltd
Lafarge Aggregates Ltd
Land & County Development
Land Planning Group Plc
Landro Ltd
Layston C of E First School
Layston Pre-School and Nursery
Leach Homes
Leapfrogs Pre-School
Leaside Church
Leaside Under 5's Kindergarten

Lee Valley Estates
Leventhorpe School
Linden Homes Eastern
Little Hadham Pre School Playgroup
Little Hadham Primary School
Little Munden C of E (VC) Primary School
London Gypsy and Traveller Unit
Longmores Solicitors
M & D Developments Ltd
M J Warner
Mandeville Primary School
Manor Fields Primary School
Manor of Groves Hotel
Marchfield Developments Ltd
Marchfield Properties Ltd
Mark Liell & Son
Marksmill LLP
Marlers Estates Ltd
Martin Strategic Land
Martineau
McCarthy & Stone (Developments) Ltd
McCarthy & Stone Retirement Lifestyles Ltd.
McMullen & Sons Ltd
Merck, Sharp & Dohme Ltd
Messers C & W Hampton
Messers Tinney, Streeter & others
Methodist Church (Hertford & Watton-at-Stone)
Metropolitan Housing Trust
Michael J Lodge & Co
Middleton School
Mill Mead School
Miller Strategic Land
Millfield First & Nursery School
Millfield Little Stars
Mini Cowpers
Moles Farm Wodson & RABI
Molewood Residents Association
Molyneux Planning
Morgans Playgroup
Morgans Primary School
Much Hadham Church Council
Much Hadham Playgroup
Mullucks Wells
Muslim Prayer Group
Mynott & Webb

Nash & Jones Partnership
Nathaniel Lichfield and Partners
National Express East Anglia
National Farmers Union
National Federation of Gypsy Liaison Groups
National Grid Property Holdings Ltd/National Grid Gas
National Grid Property Ltd
National Trust
Netherfield Partnership
Network Housing Group Ltd
Network Rail Property
Newgate Street Society
NFU
Nicholas Kidwell Architect
North Hertfordshire Homes
North Stevenage Consortium
Northgate Primary School
Oak Grove Residents Association
Oakley Coachbuilders
Old Road Securities PLC
Openreach Newsites
Optimis Consulting
Orchard House Pre-School
Orchard Surgery
Origin Housing Association
PALS Pre-School
Papworth Trust Home Solutions
Paradigm Housing Group
Paradise Wildlife Park
Parsonage Residents Association
Parsonage Surgery
Paul Dickinson & Associates
Paul Wallace Land & New Homes
Pegasus Planning Group
Pelham Pre-School
Pelham Structures Ltd
Pellys LLP
Persimmon Homes (Essex) Ltd
Peter J Hamilton & Associates
Phillips Planning Services Ltd
Pinewood School
Places for People
Planning Perspectives
Planning Potential
PLI Property Developments
Portland Road Residents' Association

Presdales School
Prestbury Investment Holdings
Priors Wood Primary School
Protecting Aston's Community Existence (PACE)
Puller Memorial C of E (VA) Primary School
PWLL Consortium
R Gray & Son
Ralph Sadleir School
Ramblers' Association
Rapleys LLP
Redrow Homes Eastern
Redrow Homes South East
Reedings Junior School
Regal Specialist Industrial Supplies
Religious Society of Friends
RenewableUK
Richard Hale Association
Richard Hale School
Rivers Education Support Centre
Rivers Nursery Site & Orchard Group
Riversmead Housing Association
Robert Crawford Associates
Roger de Clare C of E (VC) First & Nursery School
Roger Tym & Partners
Roman Catholic Diocese of Westminster
Romehold Ltd (a subsidiary of Galliard Homes Ltd)
Ropemaker
Ropemakers Properties Ltd
Royal Mail Group Ltd
RPS Planning and Development
RSPB
Russell & Daniel Bone
Sacred Heart of Jesus & St Joseph Roman Catholic Church
Sacred Heart RC Primary School
Sainsburys Supermarket Ltd
Salvation Army
Salvation Army Bishop's Stortford Corps
Sanctuary Carr-Gomm
Sanctuary Hereward
Sanderson Weatherall
Sandon Cygnets Group
Save Our Green Spaces (SOGS)

Representing South Ware
Savills
Savills (UK) Ltd
Savills PLC
Sawbridgeworth Pre-School
Sawbridgeworth Sport Association
Selections Adult Education Programme
Shelter
Shire Consulting
Sikh Society
Silver Birches Children's Centre
Simon Balle School
Smiths Gore
Sons of Divine Providence
South Anglia Housing Association
South Street Surgery
Spellbrook Primary School
Sport England
Springboard Housing Association Ltd
Springs Christian Fellowship
SSR Planning
St Andrew & the Holy Cross
St Andrew's C of E (VC) Primary School
St Andrew's C of E Primary and Nursery School
St Andrew's Church (Hertford)
St Andrew's Church (Watton-at-Stone)
St Catherine's C of E Primary School
St Cecilia Church
St Dunstan's Church
St Edmund & the English Martyrs Catholic Church
St Edmund's College & St Hugh's School
St Elizabeth's Centre
St George's Church
St Gerard's Playgroup
St Giles Church
St James Developments (UK) Ltd
St James Montessori
St James the Great
St John The Baptist C of E (VA) Primary School
St Joseph & the English Martyrs
St Joseph's in the Park School
St Josephs Playgroup

St Joseph's Pre School
St Joseph's RC Primary School (Bishop's Stortford)
St Joseph's RC Primary School (Hertford)
St Leonard's Church
St Margarets Church PCC
St Mary's C of E (VC) Junior School
St Mary's Catholic School
St Mary's Church (Braughing)
St Mary's Church (Hertford)
St Mary's Church (Sawbridgeworth)
St Mary's Church (Ware)
St Mary's Church of England
St Michael's C of E (VA) Primary School
St Michael's Church
St Peter's Church
St Richard of Chichester Church
St Thomas of Canterbury RC Primary School
St Thomas's Catholic Church
Standon and Puckeridge Independent Nursery School (SPINS)
Standon and Puckeridge Surgery
STANDonA120 campaign
Stansgate Planning LLP
Stansted Airport Ltd
Stapleford Early Years
Stapleford Primary School
Stellco Developments Ltd
Stepping Stones Day Nursery
Stewart Ross Associates
Stigma Operations Ltd
STOP Harlow North
Stop Stansted Expansion
Strutt & Parker
Sublime Land Ltd
Summercroft Primary School
Sunland Nominees Pty Ltd
Sustrans
Swanfield (Hamels) Ltd
Sworders
T Findlay & Sons
Tamil Union of Hertfordshire
Taylor Wimpey Ltd
Taylor Wimpey Strategic Developments

Tees Law
Terence O'Rourke Ltd
Tesco Stores Ltd
Tetlow King Ltd
Tewin Cowper C of E (VA) Primary School
Tewin Residents Group
Thames Water Property Services
The Airport Operators Association
The Bishop's Stortford High School
The Braughing Society
The Canal & River Trust
The Catholic Worker Farm (London Catholic Worker)
The Chauncy School
The Co-operative Group (Planning Department)
The Cordell family
The Council of Almoners of Christ's Hospital
The Croft Group Ltd
The Easney Estate
The Fairfield Partnership
The Gallery at Parndon Mill
The Gates Family of Wymondley Bury, Little Wymondley
The Georgian Group
The Gypsy Council
The Health Centre
The Herts & Essex High School and Science College
The Hub Church
The Lawn Tennis Association
The Leventhorpe Foundation School
The Maltings Surgery
The Millbank family
The Mynott family
The Netherfield Partnership
The Pines Pre School
The Ramblers - Hertfordshire & North Middlesex Area
The Richard Whittington Primary School
The Royal Agricultural Benevolent Institution
The Roydon Society
The Sele School
The Society for the Protection of Ancient Buildings

The Thatching Information Service
The Theatres Trust
The Traveller Law Reform Project
The Trustees of the Fourth Lord Gerard Discretionary Will Trust
The Ware Christadelphians
The Ware Society
The Woodland Trust
Thomas Rivers and Deville Estates
Thorley Christian Centre
Thorley Hill Primary School
Thorley Manor Residents Association
Thorn Grove Primary School
Three Valleys Water Plc
Thundridge & High Cross Society
Thundridge Primary School
Tiny Toes Day Nursery
Tip Tops Pre-School
Tonwell St Mary's C of E Primary School
Touchwood Homes
Tower Primary School
Transition Hertford
Traveller Law Reform Project
Trundles
Trundles Ltd
Trustees of G & S Stores Directors Pension Fund
Trustees of JB Sapsed Grandchildren's Property Trust
Trustees of Rush Green Settlements & Hertford Rugby Club
Turley
United Reformed Church
Universities Superannuation Scheme Ltd
University Of The Third Age
Van Hage Garden Company
W A Fairhurst & Partners
Walkern Pre School
Walkern Primary School
Wallace House Surgery
Ware Road Surgery
Ware Town Partnership
Ware U3A
Wareside C of E Primary School
Wareside Pre-School
Warner-Smith Trustees

Warwick Road Residents' Association
Waterhall Group PLC
Watermill Estate Residents' Association
Watton Place Clinic
Watton-at-Stone Playschool
Watton-at-Stone Primary & Nursery School
Wattsdown Limited
Wellgrove Education Trust
Westmill Farm
Westmill Nursery
Weston Homes
Wheatcroft Primary School
Wheatley Homes Ltd
Widford School
Windhill Children's Centre
Windhill Primary & Nursery School
Wisbey Goodsell
WM Morrisons Supermarkets PLC
Woodhall Estate
Woodhall Properties Ltd
Woods Hardwick Planning Ltd
Youth Create
ZOG Brownfield Ventures Ltd.

Appendix D: Respondents to Regulation 18 Consultation

Specific Consultation Bodies

- Anglian Water
- English Heritage (now Historic England)
- Environment Agency
- Hertfordshire County Council: Archaeology, Ecology, Education, Landscape, Minerals and Waste, Property and Technology, Transportation, Planning and Policy Unit
- Hertfordshire Local Enterprise Partnership
- Highways Agency (now Highways England)
- Lee Valley Regional Park Authority
- Mobile Operators Association
- Natural England
- Neighbouring Authorities: Broxbourne Borough Council, Epping Forest District Council, Essex County Council, North Hertfordshire District Council, Harlow District Council, Stevenage Borough Council, Uttlesford District Council, Welwyn Hatfield Borough Council)
- NHS England (NHSE)
- NHS East and North Hertfordshire CCG
- Thames Water

East Herts Town and Parish Councils	
Bishop's Stortford Town Council	High Wych Parish Council
Buntingford Town Council	Hunsdon Parish Council
Hertford Town Council	Little Berkhamsted Parish Council
Sawbridgeworth Town Council	Little Hadham Parish Council
Ware Town Council	Much Hadham Parish Council
Anstey Parish Council	Stanstead Abbots Parish Council
Aston Parish Council	Tewin Parish Council
Braughing Parish Council	Thorley Parish Council
Buckland and Chipping Parish Council	Walkern Parish Council
Datchworth Parish Council	Wareside Parish Council
Eastwick & Gilston Parish Council	Watton-at-Stone Parish Council
Great Amwell Parish Council	Westmill Parish Council
Great Munden Parish Council	Widford Parish Council
Hertingfordbury Parish Council	

Other Parish and Town Councils	
Roydon Parish Council	Stansted Mountfitchet Parish Council

General Consultation Bodies and Other Organisations	
Aston Village Society	Hertfordshire Building Preservation Trust
Bishop's Stortford Civic Federation	The Herts & Essex High School and Science College
Bishop's Stortford High School	Herts & Middlesex Wildlife Trust
Bishop's Stortford Liberal Democrats	Labour Party
Bishop's Stortford Museum	Molewood Residents Association
Buntingford Action for Responsible Development (BARD)	Plymouth Brethren Christian Church
Buntingford Civic Society	Ramblers' Association
Buntingford Chamber of Commerce	The Roydon Society
The Canal and River Trust	Save Our Green Spaces (SOGS) Representing South Ware
Cecil Close Residents Association	Sport England
Chantry Community Association	Stansted Airport Ltd
CPRE - The Hertfordshire Society	STOP Harlow North
East Herts Council Community Services and Housing Services Environment and Engineering	The Theatres Trust
Fawbert & Barnard Infants School	University of Hertfordshire
Friends of Panshanger Park	The Ware Society
Haymeads Residents' Association	Ware Museum
Hertford Civic Society	Widbury Residents Association
Hertfordshire Gardens Trust	Wodson Park Sports Centre
Hertford Museum	

Land Owners, Developers and Others with Property Interest or Represented by Agent	
Name (Company/Organisation)	Representing Agent
Ashley, Sylvia	Sworders
Barratt Homes North London	Prospect Planning
Barratt Homes North London	Strutt & Parker LLP
Barton, John A	Prospect Planning
Barton Willmore	
F Beets & J Wallace	Savills (UK) Ltd
Bennison, Terry	Prospect Planning
Bidwells	
Bishops Stortford College	Sworders
Bishop's Stortford Football Club	Prospect Planning
Bishop's Stortford North Consortium	Star Planning & Development
Bloor Homes	
Boyer Planning Ltd	
Bridgeman, D	Gillian Davidson
Bridgeman, V	Prospect Planning
Brookgate Ltd	Bidwells
Chapman, James	Barker Parry Town Planning Ltd
Christ's Hospital Foundation	Deloitte Real Estate
City and Provincial Properties	Savills Planning & Regeneration
Clark, C	Sworders
Coastwind Ltd	Andrew Martin Planning

Coastwind Ltd	Phase 2 Planning and Development Ltd
Cooper, J	Prospect Planning
Croudace Strategic Ltd	Woolf Bond Planning
The Co-operative Group	
The Co-operative Group	Indigo Planning
Countryside Properties	
Countryside Properties	JB Planning Associates
Crest Nicholson	Savills (UK) Ltd
DLP Planning Ltd	
D W Group Holdings Ltd	Prospect Planning
Darling Homes LLP	Woods Hardwick Planning Ltd
Deville Estates	Andrew Martin Planning
Diageo Pension Trust Ltd & Wrenbridge	Barton Willmore
Dickermill Coachworks Ltd	
The Esbies Estate	Andrew Martin Planning
Fairview New Homes	Vincent and Goring
FBC Group	Indigo Planning
Findlay, Peter	Sworders
French & Jupps Ltd	JB Planning Associates
Gascoyne Cecil Estates	JB Planning Associates Ltd
Gladman Developments	
Grayston, S	Phase 2 Planning & Development Ltd
Harlow West Consortium	Pegasus Planning Group
Havord, Philip J	Prospect Planning
Hayter Ltd	Sworders
Hertford Land Ltd	Shire Consulting
The Trustees - Hillside Nursery	Gillian Davidson
Hubert C Leach (Leach Homes)	Barker Parry Town Planning Ltd
Hughes, Bernard and Lynda	JB Planning Associates
Hughes	Stuart Cunliffe
Hythe Ltd	Keymer Cavendish
The JC and LB Thomson Trust	Prospect Planning
Jenkins, J and Bailey, D	Andrew Martin Planning
Kemp, Nigel	Phase 2 Planning & Development Ltd
Kler Group	Barton Willmore
Lafarge Tarmac	David Lock Associates
Linden Homes Eastern	Planning Works Ltd
London & Regional	Savills (UK) Ltd
Lunar Retail sarl	
Marchfield Properties Ltd	JB Planning Associates
Matterhorn Capital DC Bury Green S.A.R.L.	Daniel Rinsler & Co.
Montagu Evans LLP	
Munro, Sarah	Shire Consulting
National Grid Property Holdings Ltd/National Grid Gas	Vincent and Goring
Newton, P	JB Planning Associates
Oakley Coachbuilders	Prospect Planning
C C A Parkins & Sons	Sworders
Persimmon Homes Essex	

Pigeon Investment Management Ltd	Evolution Town Planning Ltd
Places for People	Quod Planning
Planning Potential	
Positive Solutions	
Ptarmigan Planning	Barton Willmore
Reading	Prospect Planning
Ryan, Mick	Prospect Planning
Savills (UK) Ltd	
Shire Consulting	
Silver Spoon	Rapleys LLP
St Albans Diocesan Board of Finance	Bidwells
St James Developments (UK) Ltd	CBRE
St James Montessori	
St John's College Cambridge	Savills
Stort Landowners Consortium	Sworders
Trustees of Mrs W Streeter	Mark Jackson Planning
Sunland Nominees Pty Ltd	Strutt & Parker
Sworders	
Taylor Wimpey Strategic Developments	DLP Planning Ltd
Taylor Wimpey Strategic Developments	Pegasus Planning Group
Telereal Trillium	Iceni Projects Ltd
Tewin Grove Plot Owners	Tewin Grove Development Group
Threadneedle Property Investments	Indigo Planning
Thurley, N	Gillian Davidson
University of Hertfordshire	Turnberry Planning
Van Hage Garden Company	CBRE
Waitrose	CBRE
The Ware Park Trust	Sellwood Planning
Wattsdown Limited	Moult Walker
Weston Homes	
Wheatley Homes Ltd	Keymer Cavendish
Mr & Mrs Wilson	Collins and Coward
Woodhall Estate	
The Trustees of the Yew Tree Trust and MRN Trust	Strutt & Parker

Individuals			
Acheson	Ben	Brugioni	Urbano
Acheson	Tim	Brugioni	Kathleen
Acott	Alexander	Bryant	Janine
Adams	Frances	Bryson	Heather
Adams	Marion	Buck	Greg
Adams	Martin	Buckelew	Janet
Adams	Wendy	Buckmaster	Eric
Adam-Smith	Ben	Burgess	Chris
Aldrich	Margaret	Burgess	Janet
Allen	C	Burgess	Nigel
Allen	Myra	Burke	Cathy
Allison	Lynne	Burlison	John and Aileen
Allman	S	Burrell	Keith
Anderson	Mark	Burridge	Susanne
Anderson	Moray	Burton	Christopher
Andersson	Mikael & Janice	Bushell	Damian
Andrew	John	Buswell	Marina
Andrews	Jeff	Butcher	Martin
Ankers	David	Cacchioli	Kirsteen
Archer	B & M	Cahill	Richard
Archibald	Kathryn	Cairns	Mike
Arnold	Stephen	Canfield	Neal
Ashby	David	Cannon	Mary
Askew	Neil	Carey	Anne
Atkins	Clive	Carey	Michael
Atkinson	R F	Carless	Andrew
Aylard	Roger	Carless	Keith
Ayres	John	Carless	Sue
B	C	Carpanini	Stephen
Bacon	Jean	Carpenter	Tricia
Bailey	T	Carr	Andrew
Baker	Robert	Carr	Anita
Baker	Simon	Carter	M
Balcombe	Richard	Carter	Robert
Ball	Ian	Carter	Tracie
Ball	Louise	Cast	Brian
Ball	Suzanne	Chalcraft	Natalie
Bampton	Bill	Chalcraft	Robin
Banks	Carole	Chapman	R
Banks	Kerrie-Louise	Chappell	Neil
Banks	Ron	Chase	Clare and Mark
Bardle	Roger	Chastell	Bryan
Barnes	John	Cheesman	Gareth
Barry	Lucy	Cheesman	Joan
Barton	Philip	Cherry	Raymond
Bartram	C A	Chiappinelli	Susan
Batchelor	Anthony	Chu	Che Wah
Batchelor	Keith	Church	William and Alison
Baughn	Annette	Clare	David

Claridge	Debra	Crowther	Tim
Clark	Elizabeth	Culkin	Sara
Clark	John	Currell	Richard
Clark	Raymond	Cutting	George
Clark	Rosa	Daar	Alexandra
Clark	Sarah	Dainty	David
Clark	Victoria	Dalli	G E
Clark	Zachary	Dalton	P A
Clark-Bould	Joanna	Davey	Graham
Clarke	James	Davidson	Anne
Clarke	John	Davidson	Robert
Clarke	Julia	Davies	
Clarke	Susan	Davies	David
Clarke	Yolande	Davies	Emma
Clay	Linda	Davies	Julia
Coates	C	Davis	Beryl
Cocker	Michael	Davis	John
Cockley	Simon	Davis	Will
Coggins	Jill	Davitt	Jane
Coleman	Ian	Day	Rod & Maggie
Coleman	Linda	Deal	Gwenda
Collier	Drew	Dean	Ian
Collin	David	Dear	Susan
Collins	Peter	Dearman	David
Collyer	Sarah	Delain-Burke	Isabelle
Comley	Peter	Delaney	Melanie
Connolly	Lynda	Deveci	Hasan
Connolly	Tim	Dixon	Lawrence
Cook	Alice	Dixon	Paul
Cook	Anthony	Doal	Beena
Cook	Lynn	Donoghue	Patrick
Cook	Michael	Donovan	Lisa
Cook	Peter	Douglas	Paul
Cook	Tessa	Doway	Yvonne
Cooper	Ian	Downes	Anne
Cooper	Matthew	Dowsett	Brian & Elizabeth
Copeman	Joe	Dowsett	Chris
Copland	Philip	Doyle	Jack
Corbet	David	Doyle	John & Sophie
Cordingley	Geoffrey	Drake	Terry
Corlett	Janet	Drane	Michael
Cotterell	Paul	Draper	Peter
Cox	Andrew	Dumbovic	K
Cox	Rebecca	Dunstan	Mark
Coyne	Kenneth	Durbin	Jean
Cozzi	Martina	Durbridge	Martin
Crace	Christine	Dyer	Ian
Critchlow	Adrienne	Dymock	Gillian
Cropp	Edward	Dymock	Steve
Crosby	J	Ealey	David

Early	Vicky	Gilchrist	Angela
Edwards	Gruff	Gill	M
Ellam	David	Gilmour	Christopher
Ellison	George	Ginn	Eric
Elsden	Mike	Glanville	Michelle
Emery	Carol	Glanville	Steven
Emsley	Angela	Glasspool	Susan
Emsley	R W	Glover	Kerry
Emsley	Robert	Glover	Tim
Etheridge	Anita	Goddard	Roger
Evison	Mark	Godfrey	Ashley
Excell	Michael	Goldsmith	Astrid
Fahey	Paul	Goldsmith	Barrie and Marie
Fairweather	M	Goodwin	Sean
Fardell	J G	Goodyear	Michael
Farmer	David	Gorham	Sally
Farnham	Lotte	Graham	Martin
Felstead	Gemma	Graham	W G
Felstead	John	Gray	N
Fielding	Cristina	Green	Tim
Firman	Denise	Greenwell	Ava
Firmin	Phil	Griffith	Vivienne
Fisher	John	Griggs	Laura
Fishwick	Eric	Grisbrooke	John
Fitzgerald	S	Grocock	Dawn
Fitzgerald	Sean	Guilbride	Janet
Fitzgerald	Suzanne	Guilbride	Michael
Fleck	Russell	Hajkowski	Steven
Flowerday	Bobby	Hale	Ian
Flowers	Howard	Halford	Roger & Sandra
Fosters	The	Hall	Adam
Fowler	Robin	Hall	Beverley
Fox	David	Hall	Chris
Fox	Mike	Hall	Lizzie
Foy	Tom	Hammond	Liz
Fradley	R J	Hannah	Richard
Francis	Rob	Harden	Kate
Francis	Suzanne	Harden	Rebecca
Franklin	Alice	Harden	Tom
Franklin	Charles	Hardie	Mark
French	David	Harding	
Friend	Susan	Harding	Frances & Bill
Futter	David	Harding	Keith
Geller	Alex	Hardinge	Edward
George	Charlotte	Hardy	David
George	Jeremy	Hardy	Elizabeth
George	Rebecca	Harman	A C
George	Sharon	Harrington	Unity
Gibbs	Harry	Harris	Andrew
Gibbs	Helen	Harris	Gemma

Harris	Peter	Howard	Rebecca
Harris	Sharon	Howarth	Diana
Harris	Susan	Huckle	D
Harrison	Arthur	Hudson	Ian
Harrison	Julie	Hughes	Edward
Hart	Chris	Hughes	Esther
Hartley	Caroline	Humphrey	Janette
Harvey	Keith	Hunt	N
Haslett	Lynne	Hussain	M
Haswell	Ray	Hutchinson	Marguerita
Haworth	Clare	Illston	Sherrall
Hazell	John	Ireland	John
Hazelwood	Paul	Irons	Belinda
Hedley	Roy	Irvine	Stewart
Hegley	Grant	Irwin	Suzanne
Hemsworth		Isard	Mark
Henson	M	Jackson	Mary
Hermitage	Jennifer	James	Alan & Judith
Heseltine	Anton	Jarczewski	Paul
Hewlett	Paula	Jefferys	Brian & Gillian
Hewson	Kathleen	Jenkins	Colin
Hewson	Kathleen and Roland	Jennings	Gemma
Hewson	Roland	Jewson	Lee
Hill	Bob	John	Tony
Hill	J W	Johnson	Chris
Hill	Justin	Johnson	Peter
Hill	William	Johnson	Valerie
Hilliman	Catherine & Alan	Jones	Amanda
Hills	Tony	Jones	Bryn
Hilton	Mary	Jones	Corin
Hobkinson	Ailsa	Jones	Laura
Hodge	C	Jones	Laurence
Hodgen	David	Jones	Linda
Hodgkinson	Louise	Jones	Pamela
Holbrook	Elizabeth	Jones	Ross
Holder	Andrew	Jones	Simon
Hollis	Chris	Jones	Sulgwyn
Holmes	Keith	Jordan	H C & D E
Holyfield	Christine	June	Warriner
Honeywood	Elizabeth	Kappaka-Benzing	Michalitsa
Honeywood	Jane	Karn	Madeleine
Honeywood	Lucy	Karn	Marcus
Hootton	John	Karn	Stephen
Horrax	James	Keen	David
Horwood	Katie	Keen	Rachel
Hough	Peter	Kell	Christine
Hough	Peter K	Kenney	D
Howard	Daniel	Kenway	Philip
Howard	Julia	Kenway	R

Kenyon	Bradley	Makin	John
Keppler	Ray	Mallinson	Tim
Ker	Matt	Mann	Jack
Kerslake	B	Mannino	Denise
Keys	Rob	Mansfield	B
King	Kathryn	Marley	D
King	Neale	Marshall	Angela
King	Paul	Marshall	Ronald
King	Rod	Martin	D
King	Stirling and Lisa	Martin	D W
Kingseller	Justin	Martin	Daniel
Kitchen	Elaine	Martin	Roger
Kitchen	Meredith	Martinelli	Enrico
Knight	Alison	Mascall	Steve
Knight	Hannah	Maxwell	Barry
Knight	R J	Mayes	Danny
Knowles	David	Maynard	Chris
Ladbrook	James	McCarthy	LJ & P
Laidler	Jeff	McClymont	Elizabeth
Lambert	Nicholas	McDermott	Simon
Lancaster	Philip & Marion	McDonald	Sylvia
Lancaster-Clark	Verity	McEnally	Eve
Landon	Susan E	McGowan	Tom
Latchford	Doreen	McIntyre	Colin
Law	Jacqueline	McLaren	Jennie
Law	John	McMurray	Nikki
Law	S	McMullen	Tom
Lawless	Ben	McNally	Florence
Lawson	Robert	Melville	Antony
Lawson	Terrence	Melville	Katharine
Leary	Gregory	Mew	Rob
Leaver frics	Colin	Miles	Anne
Le Duc	Christine	Miles	Kevan & Becky
Lee	Kevin	Milner	Graham
Legon	Lieann	Milne-Smith	Pat
Leigh	Beatrice	Mintern	Emer
Lewis	Joanne	Mizen	N D
Lewis	John	Moody	Janet
Lincoln	Simon	Morgan	Ray
Lindop	Len	Morley	Alan
Locke	Angela	Morley	Peter
Lomax	Peter	Morley	Sheila
Lovell	Carol	Morris	Andrew
Loyer	Richard	Morris	Kathleen
Luxford	Samantha	Morris	Rick
Lynch	Lewis	Morris	Tricia
Macmillan	Ian	Morrisoe	Olga
Macpherson	Andrew	Moule	Barry
Maisey		Moule	C
Majekodunmi	Annette	Mount	Heidi

Moylette	Nicola	Patten	Allan
Muhiddin	Fabienne	Payne	Tom
Mumford	Lesley	Peacock	C W
Munn	Richard	Peacock	Jane
Murphy	John	Pearce	Bob
Musselwhite	Malcolm	Pearce	David & Audrey
N	S	Pearce	R
Nash	Martin	Pearce	Robert
Nassau	Pam	Pearcy	Patricia
Neal	Andrew	Pearson	Andrew
Neave	Vickie	Pearson	Mr & Mrs
Needham	Tanya	Peckham	Richard
Nelson	Carol	Peel	William
Newell	Diana	Pegg	Robert W
Newland	Simon	Penn	Alan and Janet
Newman	Mike	Pennington	Julian
Nixon	Jacqueline	Perry	C M & K J
Noakes	R E	Petherick	Ann
Noble	T R & C L	Pettit	D
Norman	Eve	Phipps	Thomas
Norman	Peter	Piercy	Derek
Norris	Simon	Pikett	John
North	Nigel	Pizey	Sonia
Norton	Karen	Pledger	Nigel
Nottage	Michael	Pole	Lanier
Nottage	Robert	Prescott	B
O'Connor	Gill	Price	Keith
O'Leary	Gary	Price	Tony
O'Smotherly	Colin	Pringle	Graham
O'Sullivan	Emmet	Prisk	Mark, MP
Ochiltree	G	Proctor	Dean
Ogier	Rachel	Pulham	Susan
Oldridge	Rachel	Pyatt	Andy
Orsborn	Jane	Quick	Steve
Orton	Paula	Quinn	Michelle
Orwin	Darren	Ramsay	
Owen	Robert	Ratcliffe	Gill
Packer	Joanne	Ray	Karen
Page	John S	Read	Gary
Palmer	Tracey	Reeks	Tom
Panter	Anthony	Rees	Michael
Panter	Leslie	Remmington	Julian
Parrott	Lee	Remmington	Mark
Parry	Glenys	Reynolds	Steven
Parsons	Graham	Richards	Pat
Parsons	Philip & Dot	Richards	Warren
Parsons	Rosemary & Peter	Richardson	
Paterson	J	Richardson	Alexia
Patrick	Terry	Richardson	Katharine

Richardson	Mark	Segal	Catherine
Richardson	Tony	Segal	Saul
Riches	Ralph and Heather	Senior	Adam
Rider	John	Sewell	David
Ridge	Catherine	Shaw	Kim
Ridge	Jayne	Shaw	Paul
Ridgewell	Gordon	Shaw	S
Ripper	Ken	Sheldrake	Norman
Risby	Clive	Shepherd	Major
Rist	Ken	Sheppard	Jeff
Rist	M and K	Shillito	Libby, Peter, Matt & Tim
Rixson	Christine	Shirley	Maureen & John
Roberts	Jenny	Shock	Philip
Roberts	Nigel	Shrosbree	Barrie
Roberts	Paul	Simmons	Christopher
Robertson	S	Simmons	Keith
Robinson	Jonathan	Simpson	Jane
Robinson	Louise	Slee	John
Robinson	Michael	Sleigh	Tom
Robson	Irene	Smith	Brenda Margaret
Rogers	F	Smith	Byron
Rollins	Claire	Smith	Charles
Rose	Jean	Smith	Devin
Rose	Jonathan	Smith	J S
Rose	Steve	Smith	Jim
Rossall	Donna	Smith	Ken
Rossiter	Tim	Smith	Louise
Rowlatt	Steve	Smith	Martin
Rowley	Maureen	Smith	Peter & Mollie
Royle	David	Smith	Richard
Rundle	Graham	Smith	Ryan
Rundle	Janet	Smith	Samantha
Ryan	Andy	Snelling	Ruth
Saban	Kim	Sovitch	Marian
Saban	Steve	Spears	Phil
Saggers	Michael	Spiers	Jo
Salter	David	Springham	Jay
Sapsford	Elizabeth	Stacey	Glen
Sarles	Clair	Standley	M E
Sarles	Stefan	Standley	Rosalie
Sartin	Jane	Stanley	David
Saunders	Sara	Stanley	Katharine
Saville	David	Statham	Jason
Saville	J	Statham	N
Scales	N	Steele	William
Scilly	Seb	Stephens	Sharon
Scott	David	Stevens	Shelia
Seabrook	Florence	Stevenson	Andrew

Stevold	Greta	Vaughan	Ann
Stewart	Bernard	Vaughan	Martin
Stocker	Janet	Stockwell	Pat
Stowe	David	Veale	Richard
Stringer	William	Vivers	Anthony
Stubbs	Chris	Voce	Helen
Stuttard	Louise	Voce	S
Stuttard	Thomas	Voller	V A
Sullivan	J	Vowles	David & Margaret
Sullivan	Sarah	Walden	Ann
Sumby	Deborah	Walden	Michael
Sunda	Amarjeet	Walker	A & E
Swallow	Rosemary	Walker	Dan
Swan	Susan	Walker	Helen
Swanzy	Martin	Walker	Sharon
Sweeney	Chris	Wallace	Pam & Nick
Tagliarini	Kelly	Walton	E
Tait	Robert James	Ward	Mark
Taylor	Alison	Warnes	Sarah
Taylor	Elahe	Warrington	Brian
Tesselment	Robin	Warwick	Mark
Thacker	Michael	Warwick	P Z
Thaddeus	Gary	Watkins	S
Thomas	Alan	Watson	Brian
Thomas	David	Watson	Peter
Thomas	Guy	Weeks	K G & R M C
Thomas	Heather	Welch	Bill
Thomas	Janet	Weston	Nick
Thomas	Kelly	Wetherell	Emma
Thomas	Margaret	Whippy	Arthur
Thomas	Mark	Whisker	Roger
Thomas	Natalie	White	Andy
Thompson	Will	White	Emily
Thorogood	Alison	White	K
Thorpe	Lauren	White	Keith
Thorpe	Simon	White	Malcolm
Thurston	M A	White	Sheila
Ticquet	Catherine	White	Suzanne
Tipper	Jeff	White	Tim
Todd	Laura	Whitehead	Stephen
Toll	Robert	Whiting	Richard
Toms	Barbara	Wild	Christine
Toms	Roger	Wilding	John
Troll	Clifford	Wiles	Rachel
Troughton	Anne	Willats	Cameron
Troughton	Peter	Williams	Anthony R.P.
Trundle	Terry	Williams	G
Turner	Jill	Williams	Geoffrey
Turner	Ralph	Williams	Gina
Tyler	Paul	Williamson	Mary

Wilson	Benjamin	Wright	Celia
Wilson	Iain	Wright	D W R
Wilson	Lynette	Wright	Janet
Windus	Richard	Wright	Julia
Wines	Mark	Wright	Katy
Wise	Jean	Wright	Richard
Wood	A A	Wright	Tim
Wood	Matthew	Wright	Vivienne
Woodhall	Michael	Wyett	Charlie
Woollard	Daphne	Yau Chu	Kin
Worboys	Roland	Youens	Andrew
Wrelton	David		

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 13 OCTOBER 2016

REPORT BY THE LEADER OF THE COUNCIL

AIR QUALITY PLANNING GUIDANCE, OCTOBER 2016

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents an Air Quality Planning Guidance prepared to support the East Herts District Plan and to assist in the Development Management process. The guide is intended to provide clarity and consistency by confirming how the Council will assess planning applications in relation to air quality.

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL: That Council, via the Executive, be advised that:</u>	
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(A)	the Air Quality Planning Guidance, October 2016 be agreed as guidance to inform Development Management decisions.
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1.0 Background

1.1 The East Herts Local Plan Review 2007 requires development proposals to consider the impact of development on air quality and to submit appropriate details to enable a full judgement of the impact of the development to be made. Policy ENV27 requires any development within designated Air Quality management Areas to have regard to the strategy for reducing pollutants in such areas.

1.2 The Council has recently approved the Pre-Submission District Plan for consultation. Chapter 24 of the Plan also addresses air quality; Policy EQ4 Air Quality requires development and land uses to minimise potential impacts on local air quality and be supported by an Air Pollution Assessment in line with the Council's Air Quality Planning Guidance Document. This requirement was written in anticipation of the completion of the guidance presented in this report.

1.3 Policy EQ4 Air Quality further requires developments within a designated Air Quality Management Area, or which may impact on these areas, to have regard to the Council's latest strategy and action plan for the reduction of pollutants. Evidence of mitigation measures is required. To this end, the Council has prepared an Air Quality Planning Guidance, which is presented as **Essential Reference Paper 'B'**.

1.4 The Department for Environment, Food and Rural Affairs has recently updated its guidance on Local Air Quality Management (Policy Guidance (PG16), April 2016) as part of the Government's duties under Part IV of the Environment Act, 1995. This guidance is statutory and all relevant Local Authorities should have regard to it. This Policy Guidance therefore forms the basis of the East Herts Air Quality Planning Guidance.

2.0 Report

2.1 The Air Quality Planning Guidance comprises three chapters. Chapter 1 introduces the air quality issues experienced in East Herts, and explains the duties the authority has in terms of monitoring and improving air quality. Chapter 1 also explains the role of planning as a tool to influence and make improvements to air quality.

2.2 Chapter 2 provides the practical guidance. It explains when an Air Pollution Assessment is required, and what different types of proposal (minor, medium or major scale) will be expected to address in terms of assessment and/or mitigation. Mitigation may be required for all stages of development, including demolition. Chapter 3 concludes the guidance.

2.3 The guidance will be used to inform the preparation of masterplans for sites within the District Plan and the determination of planning applications. It is the intention that following the adoption of the District Plan, this Guidance will be adopted as a Supplementary Planning Document (in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012) in order to ensure it is given full weight for Development Management purposes.

2.4 It should be noted that this is only one part of the Council's commitment to addressing air quality issues in the District. The Council has set up an Air Quality Steering Group and will be

working alongside Hertfordshire County Council and other partners to update the Hertfordshire Air Quality Action Plan. The Council has also established a Climate Change Task and Finish Group and a Sustainable Transport Task and Finish Group.

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

Air Quality Planning Guidance, October 2016 -
www.eastherts.gov.uk/airqualityplanningguidance

Contact Member: Cllr Linda Haysey – Leader of the Council
linda.haysey@eastherts.gov.uk

Contact Officer: Kevin Steptoe – Head of Planning and Building Control
01992 531407
kevin.steptoe@eastherts.gov.uk

Report Author: Jenny Pierce – Principal Planning Policy Officer
jenny.pierce@eastherts.gov.uk

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives:	Priority 1 – Improve the health and wellbeing of our communities Priority 2 – Enhance the quality of people's lives Priority 3 – Enable a flourishing local economy
Consultation:	None
Legal:	None
Financial:	None
Human Resource:	None
Risk Management:	None
Health and wellbeing – issues and impacts:	The Air Quality Planning Guidance will have positive impacts on health and wellbeing.

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