



MEETING : DISTRICT PLANNING EXECUTIVE PANEL
VENUE : COUNCIL CHAMBER, WALLFIELDS, HERTFORD
DATE : THURSDAY 9 MARCH 2017
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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DISCLOSABLE PECUNIARY INTERESTS

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.
3. The Authority may grant a Member dispensation, but only in limited circumstances, to enable him/her to participate and vote on a matter in which they have a DPI.
4. It is a criminal offence to:
 - fail to disclose a disclosable pecuniary interest at a meeting if it is not on the register;
 - fail to notify the Monitoring Officer, within 28 days, of a DPI that is not on the register that a Member disclosed to a meeting;
 - participate in any discussion or vote on a matter in which a Member has a DPI;
 - knowingly or recklessly provide information that is false or misleading in notifying the Monitoring Officer of a DPI or in disclosing such interest to a meeting.

(Note: The criminal penalties available to a court are to impose a fine not exceeding level 5 on the standard scale and disqualification from being a councillor for up to 5 years.)

Public Attendance

East Herts Council welcomes public attendance at its meetings and will provide a reasonable number of agendas for viewing at the meeting. Please note that there is seating for 27 members of the public and space for a further 30 standing in the Council Chamber on a “first come first served” basis. When the Council anticipates a large attendance, an additional 30 members of the public can be accommodated in Room 27 (standing room only), again on a “first come, first served” basis, to view the meeting via webcast.

If you think a meeting you plan to attend could be very busy, you can check if the extra space will be available by emailing committee.services@eastherts.gov.uk or calling the Council on 01279 655261 and asking to speak to Democratic Services.

Audio/Visual Recording of meetings

Everyone is welcome to record meetings of the Council and its Committees using whatever, non-disruptive, methods you think are suitable, which may include social media of any kind, such as tweeting, blogging or Facebook. However, oral reporting or commentary is prohibited. If you have any questions about this please contact Democratic Services (members of the press should contact the Press Office). Please note that the Chairman of the meeting has the discretion to halt any recording for a number of reasons, including disruption caused by the filming or the nature of the business being conducted. Anyone filming a meeting should focus only on those actively participating and be sensitive to the rights of minors, vulnerable adults and those members of the public who have not consented to being filmed.

AGENDA

1. Apologies

To receive apologies for absence.

2. Chairman's Announcements

3. Minutes (Pages 7 - 12)

To approve the Minutes of the meeting of the Panel held on 13 October 2017.

4. Declarations of Interests

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

5. East Herts District Plan - Regulation 22 Consultation Statement, March 2017 (Pages 13 - 330)

6. East Herts District Plan - Duty to Co-operate Compliance Statement, March 2017 (Pages 331 - 542)

7. Equalities Impact Assessment of the East Herts District Plan, March 2017 (Pages 543 - 570)

8. East Herts District Plan - Proposed Minor Changes, Submission and Examination (Pages 571 - 600)

9. East Herts Infrastructure Delivery Plan, February 2017 (Pages 601 - 702)

10. Transport Modelling - COMET and VISUM Technical Papers (Pages 703 - 754)

11. Approach to Master Planning and Delivery of Strategic Sites (Pages 755 - 760)

12. Urgent Business

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

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

PRESENT: Councillor L Haysey (Chairman)
Councillor E Buckmaster.

ALSO PRESENT:

Councillors A Alder, M Allen, D Andrews,
P Ballam, S Bull, M Freeman, J Goodeve,
M McMullen, T Page, M Pope and S Rutland-
Barsby.

OFFICERS IN ATTENDANCE:

Chris Butcher	- Principal Planning Officer
Martin Ibrahim	- Democratic Services Team Leader
Kay Mead	- Principal Planning Officer
Laura Pattison	- Senior Planning Officer
Claire Sime	- Planning Policy Manager
Kevin Steptoe	- Head of Planning and Building Control Services
Liz Watts	- Chief Executive
Cerys Williams	- Senior Environmental Health Officer (Environment)

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

The Panel considered a report on the Sustainability Appraisal (SA) of the Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area (HMA).

Members were reminded that the Council had been working with Epping Forest, Harlow and Uttlesford District Councils through the Duty to Co-operate to identify the objectively assessed needs of the HMA and to explore options for meeting these needs across the HMA. Part of this work had involved undertaking a Sustainability Appraisal style assessment of the range of growth and locational options for delivering new housing. A draft of this assessment had been used to inform each Authority's formal Sustainability Appraisals and was now presented in its final form, as detailed at Essential Reference Paper 'B' of the report submitted.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that 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.

65 **EAST HERTS DISTRICT PLAN – INTERIM DUTY TO CO-OPERATE COMPLIANCE STATEMENT**

The Panel gave consideration to a report presenting the Interim Duty to Co-operate Compliance Statement. The Statement identified how the Council had engaged with neighbouring authorities and other organisations throughout the plan making process in order to address

strategic cross boundary issues.

In response to Members' comments and questions, Officers advised that Hertfordshire County Council's "2015 Vision" had been published and a web link to the document would be sent to all Members. A report on this matter would also be submitted to the Executive meeting in December 2016.

Officers also explained that dialogue with all neighbouring authorities, and not just those in the Strategic Housing Market Assessment area, had taken place throughout the plan-making process. Although Stansted Airport was not a statutory consultee, Officers had been and continued to be in regular dialogue.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that the Interim Duty to Co-operate Compliance Statement be agreed in support of the Pre-Submission District Plan.

66 **EAST HERTS DISTRICT PLAN – INTERIM CONSULTATION STATEMENT**

The Panel considered an Interim Consultation Statement which would form a companion document to the East Herts District Plan Pre-Submission Version, 2016, for consultation purposes. This Statement had been prepared 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. A final Consultation Statement would be prepared once the Council was in a position to include reference to any representations made under Regulation 20, at the end of the Pre-Submission Consultation.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that 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.

67 **AIR QUALITY PLANNING GUIDANCE, OCTOBER 2016**

The Panel considered a report presenting Air Quality Planning Guidance, which had been prepared to support the East Herts District Plan and to assist in the Development Management process. The guide was intended to provide clarity and consistency by confirming how the Council would assess planning applications in relation to air quality.

Chapter 24 of the Draft District Plan addressed air quality issues and the Panel was reminded that Policy EQ4 Air Quality required 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. Policy EQ4 Air Quality further required 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 was required. To this end, the Council had prepared an Air Quality Planning Guidance, as detailed at Essential Reference Paper ‘B’ of the report submitted.

Officers responded to Members’ comments submitted in advance of the meeting as well as those at the meeting. It was confirmed that the maps at Appendix 1 had been omitted and would be included in the final document. Officers also explained that section 106 contributions could be used for air quality issues and cited the example of Bishop’s Stortford North where £20k had been earmarked for air quality monitoring and mitigation

measures.

In respect of major developments and air quality, Officers also clarified that the cumulative impact of a development application would need to be considered in terms of making a judgement on the additional harm caused. Reference was also made to sustainable transport policies, which would look at measures such as green travel plans, car sharing, etc.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that the Air Quality Planning Guidance, October 2016, as now submitted, be agreed as guidance to inform Development Management decisions.

68 APOLOGIES

An apology for absence was submitted on behalf of Councillor G Jones.

69 CHAIRMAN'S ANNOUNCEMENTS

The Panel Chairman welcomed Members, Officers and the public and reminded everyone that the meeting was being webcast. She advised that the order of the agenda would be changed so that the item on Air Quality Planning Guidance, October 2016, would be considered first.

70 MINUTES

RESOLVED – that the Minutes of the meeting held on 15 September 2016 be approved as a correct record and signed by the Chairman.

The meeting closed at 7.46 pm

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 9 MARCH 2017

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DISTRICT PLAN – REGULATION 22 CONSULTATION STATEMENT, MARCH 2017

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members the Regulation 22 Consultation Statement, March 2017, and to seek agreement to include this as a companion document to the East Herts District Plan for Submission to the Planning Inspectorate.

RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE

PANEL: That Council, via the Executive, be advised that:

- | | |
|------------|---|
| (A) | the Regulation 22 Consultation Statement, March 2017, as detailed at Essential Reference 'B' to this report, be agreed as a companion document to the East Herts District Plan, for submission to the Planning Inspectorate. |
|------------|---|

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 Regulation 22 Consultation Statement (Consultation Statement) has been prepared 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. Members will recall that an Interim Consultation Statement was presented to the District Planning Executive Panel on 22nd October 2016.

1.3 This report details the contents of the proposed Consultation Statement to accompany the East Herts District Plan for submission purposes, and seeks agreement of this document for for Submission to the Planning Inspectorate.

2.0 Report

2.1 In order that it may comply with 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’), the Council is required to prepare a Consultation Statement.

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 When last reported to Panel, the Council was about to undertake the Regulation 19 consultation, and it was only possible at that time to produce an Interim Consultation Statement which covered points i. to iv. Since the conclusion of the Regulation 19 Pre-Submission consultation, it is now possible for matters in relation to points v. and vi. to be addressed and for the document to be presented in its final form.

- 2.4 For information purposes, and also to aid understanding of the Council's full responsibilities in respect of the Submission procedure, a reproduction of Regulations 18 to 22 is produced at Appendix A to the Consultation Statement.
- 2.5 In respect of point v., the main issues raised through the Pre-Submission consultation are included as Summary of Responses tables listed in chapter order as appendices I1 to I26 to the Consultation Statement.
- 2.6 As detailed in the East Herts District Plan – Proposed Minor Changes, Submission and Examination Report, which can be found at Agenda Item 8, a total 3,880 comments were received from 2,472 respondents. The Summary of Responses tables included in the Consultation Statement serve to consolidate the numerous individual points raised by the various bodies and individuals who responded to the consultation into a focussed and comprehensive statement of issues for each chapter. Cumulatively, these tables will provide the Inspector with a succinct overview of the main issues to be addressed through the forthcoming Examination, which will be held in due course.
- 2.7 It is important to note that the Council is not required to formally respond to these issues at this stage in the process. The tables within the Consultation Statement are therefore considered to fully comply with the requirements of Regulation 22, point v. in respect of issue summaries. However, it should be noted that copies of all of the representations made will be submitted, in full, alongside the District Plan to the Planning Inspectorate.
- 2.8 In relation to addressing point vi., it should be noted that this requirement does not apply in the case of the East Herts District Plan Regulation 22 Consultation Statement, as its intention is to cover an eventuality where no representations are made in respect of a Regulation 19 consultation.
- 2.9 The proposed final 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 for Submission 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>

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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 wide range of consultation has been undertaken in preparing the District Plan. Specific consultation on the Pre-Submission District Plan took place between the 3 rd November and 15 th December 2016.
Legal:	There are no direct legal implications arising from this report.
Financial:	There are no direct financial implications arising from this report. The cost of preparing a District Plan is significant and has been budgeted over the duration of its preparation.
Human Resource:	Staff resource is in place to ensure the ongoing timely preparation of the District Plan.
Risk Management:	The efficient and timely progression of the District Plan is of paramount importance and a risk assessment has been carried out to ensure that the preparation of the Plan takes place in accordance with the Council's Local Development Scheme. Without an adopted District Plan the district will be vulnerable to further unplanned development.
Health and wellbeing – issues and impacts:	The 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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East Herts District Plan

Regulation 22 Consultation Statement

March 2017

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- Appendix B – Regulation 18 Consultees
- Appendix C – Regulation 19 Consultees
- Appendix D – Regulation 18 Consultation Meetings and Presentations

Regulation 18 Consultation Documents

- Appendix E1 – Regulation 18 Comment Form
- Appendix E2 – Regulation 18 Consultation Portal Guidance Note
- Appendix E3 – Regulation 18 Frequently Asked Questions
- Appendix E4 – Regulation 18 Frequently Asked Questions for younger audience
- Appendix E5 – Regulation 18 Leaflet
- Appendix E6 – Regulation 18 Poster
- Appendix E7 – Regulation 18 Statement of Availability
- Appendix E8 – Summary Document

Regulation 19 Consultation Documents

- Appendix F1 – Regulation 19 Comment Form
- Appendix F2 – Regulation 19 Consultation Portal Guidance Note
- Appendix F3 – Regulation 19 Frequently Asked Questions
- Appendix F4 – Regulation 19 Post Card
- Appendix F5 – Regulation 19 Poster
- Appendix F6 – Regulation 19 Statement of Availability and Statement of Representations Procedure
- Appendix F7 – Press Notices

Respondents

- Appendix G – Regulation 18 Respondents
- Appendix H – Regulation 19 Respondents

Summary of Issues

- Appendix I1 – Chapter 1 Introduction
- Appendix I2 – Chapter 2 Vision and Strategic Objectives
- Appendix I3 – Chapter 3 The Development Strategy

Appendix I4 – Chapter 4 Green Belt and Rural Area Beyond the Green Belt
Appendix I5 – Chapter 5 Bishop’s Stortford
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Appendix I18 – Chapter 18 Transport
Appendix I19 – Chapter 19 Community Facilities, Leisure and Recreation
Appendix I20 – Chapter 20 Natural Environment
Appendix I21 – Chapter 21 Heritage Assets
Appendix I22 – Chapter 22 Climate Change
Appendix I23 – Chapter 23 Water
Appendix I24 – Chapter 24 Environmental Quality
Appendix I25 – Chapter 25 Delivery and Monitoring
Appendix I26 – Sustainability Appraisal

EAST HERTS DISTRICT PLAN, REGULATION 22, 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 Regulations 18, 19 and 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 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 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 and 19 stages, i.e. Preferred Options and Pre-Submission consultations.
- 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 5,000 persons, bodies and groups. A full list of those notified of the Preferred Options consultation is included at **Appendix B** to this Consultation Statement and those notified of the Pre-Submission Consultation is included at **Appendix C**.
- 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

Regulation 18 Consultation

- 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. As stated above, at paragraph

- 2.3, 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 D** 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 the 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.
- 3.16 Copies of relevant forms and publicity material for the Preferred Options consultation (Regulation 18) are included at **Appendices E1 to E8**.

Regulation 19 Consultation

- 3.17 The Pre-Submission consultation (Regulation 19) was carried out for a 6 week period between 3rd November and 5^{pm} 15th December 2016.
- 3.18 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. As stated above, at paragraph 2.3, a full list of those notified of the consultation is included at **Appendix C** to this Consultation Statement.
- 3.19 Hard copies of the full suite of consultation documents were made available at the Council's Offices, Town Council Offices and libraries.
- 3.20 The front cover and articles featured within the Council's Link magazine to further raise awareness, which was hand-delivered to all residential properties in the district. The magazine also benefited from reaching a further audience through wider distribution where copies were made available at Hertford Theatre, the Rhodes Centre (Bishop's Stortford), Wodson Park (Ware), Bishop's Stortford Tourist Information Centre, Hertford Tourist Information Centre, and the Council's leisure centres.

- 3.21 A poster was produced in A4 format and this was distributed to all Town and Parish Councils and libraries for display on community notice boards.
- 3.22 Post cards containing information relating to the consultation were also produced and provided to Members, all Town and Parish Councils, and libraries for distribution locally.
- 3.23 On 26th October, a presentation on the consultation was made to the Council's Parish and Urban Conference, 2016.
- 3.24 Presentations were made to Birchwood, Bishop's Stortford, and Herts and Essex High Schools.
- 3.25 All documents were made available on the Council's website, where the homepage advertised the consultation for its duration.
- 3.26 Following press releases a number of articles were published in the local press discussing the consultation.
- 3.27 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.
- 3.28 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.
- 3.29 A meeting was held with the East Herts Association of Parish and Town Councils 20th September 2016 where, as part of detailing the then forthcoming consultation, attendees were invited to encourage local residents to engage in the consultation process.
- 3.30 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.
- 3.31 Copies of relevant forms, publicity material and press notices for the Pre-Submission consultation (Regulation 19) are included at **Appendices F1 to F7**.

4.0 How we responded

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

Regulation 18 Consultation

- 4.1 A total of 3,018 comments from 1,062 respondents were received to the Preferred Options consultation. 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 East Herts District Plan Pre-Submission version reflected 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:

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

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.

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 provided at **Appendix G**.

Regulation 19 Consultation

- 4.5 A total of 3,880 comments from 2,472 respondents were received to the Pre-Submission consultation. All issues relating to relevant planning matters within representations were summarised by Officers and reported to Members of the District Planning Executive Panel at its meeting on 9th March 2017.
- 4.6 Details of those people and organisations who responded to the Pre-Submission consultation are provided at **Appendix H**.
- 4.7 In terms of the tests of soundness, legal compliance and Duty to Co-operate requirements:

3,522 (91%) of responses state that the Plan is considered to be unsound;

3,028 (78%) of responses state that the Plan has not met the legal requirements; and
2,988 (77%) of responses state that the Plan has failed the Duty to Co-operate.

Of the 3,522 responses received that state that the Plan has failed one or more of the tests of soundness:

3,341 (95% of those who considered the plan to be unsound) consider that the Plan is not positively prepared;

3,434 (98% of those who considered the plan to be unsound) consider that the Plan is not justified;

3,424 (97% of those who considered the plan to be unsound) consider that the Plan is not effective;

3,410 (97% of those who considered the plan to be unsound) consider that the Plan is not consistent with national policy.

- 4.8 In respect of representations relating to the Pre-Submission District Plan and its Sustainability Appraisal, a Summary of Issues has been prepared. This distils the main issues raised within the responses and is provided in chapter order, forming **Appendices I1 to I26** of this Consultation Statement.

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) <http://www.eastherts.gov.uk/sci>.

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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.

Appendix B – 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	Stapleford 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
Easney 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.

In addition, individuals registered on the Council's District Plan Objective database were also consulted by email.

Appendix C: Regulation 19 Consultees

Specific Consultation Bodies

- Affinity Water
- Anglian Water
- British Gas
- BT
- Canal and River Trust
- Civil Aviation Authority
- Department for Transport
- East and North Hertfordshire NHS CCG
- East and North Hertfordshire NHS Trust
- East of England Local Government Association
- EDF Energy Networks
- Environment Agency
- Essex County Council
- Greater Anglia
- Hertfordshire Constabulary
- Hertfordshire County Council
- Hertfordshire Local Enterprise Partnership
- Highways England
- Historic England
- Homes and Communities Agency
- Lee Valley Regional Park Authority
- National Grid
- Natural England
- Neighbouring Authorities: Broxbourne Borough Council, Epping Forest District Council, Harlow District Council, North Hertfordshire District Council, Stevenage Borough Council, Uttlesford District Council, Welwyn Hatfield Borough Council
- Network Rail
- NHS East of England
- NHS Hertfordshire
- Ofcom
- Other Hertfordshire Authorities: Dacorum Borough Council, Hertsmere Borough Council, St Albans City & District Council, Three Rivers District Council, Watford Borough Council
- Police and Crime Commissioner
- Stansted Airport
- Thames Water
- The Coal Authority
- The Princess Alexandra Hospital NHS Trust

- West Essex NHS CCG

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	Stapleford Parish Council
Braughing Parish Council	Stocking Pelham Parish Council
Brent Pelham and 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 and 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	Little Hallingbury Parish Council
Barkway Parish Council	Manuden Parish Council
Barley Parish Council	Northaw & Cuffley Parish Council
Berden Parish Council	Nuthampstead Parish Meeting
Birchanger Parish Council	Reed Parish Council
Clavering Parish Council	Roydon Parish Council
Clothall Parish Meeting	Rushden & Wallington Parish Council
Codicote Parish Council	Sandon Parish Council
Essendon Parish Council	Sheering Parish Council
Farnham Parish Council	Stansted Mountfitchet Parish Council
Great Ashby Community Council	Stansted Parish Council
Great Hallingbury Parish Council	Therfield Parish Council
Knebworth Parish Council	Welwyn Parish Council
Langley Parish Council	Weston Parish Council
Langley Parish Meeting	Woolmer Green Parish Council

General Consultation Bodies and Other Organisations

1st Hertford Scout Group
Abel Smith School
ACERT
ACRE
ACW International
Adam & Eve Service Station
Adlington (Gladman Care Homes Limited)
Advance Housing
Affinity Sutton Group
Age UK Hertfordshire
Albury C of E (VA) Primary School
Aldwyck Housing Group Ltd
All Nations Christian College
All Saints C of E (VA) Primary School (Bishop's Stortford)
All Saints C of E Primary and Nursery School (Datchworth)
All Saints Church (Bishop's Stortford)
All Saints Church (Datchworth)
All Saints Church (Hertford)
Altamira (UK) Ltd
Amwell View School
Amwell View School and Specialist Sports College
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
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
Ayot St Peter Parish
B.J.Ashpole Ltd
Banner Homes
Barratt Homes North London
Barton Willmore

Barton Willmore LLP
Bayford Action Group
Bayford C of E VC Primary School
Bayfordbury Estates Ltd
Beane Valley Children's Centre
Beechwood Homes
Bellway Homes
Bengeo Primary School
Benington C of E Primary School
Benington Nursery
Berkeley Homes (Three Valleys) Ltd
Birchanger HR Solutions
Birchwood High School
Bishop's Stortford Baptist Church
Bishop's Stortford Methodist Church
Bishops Park Playschool
Bishop's Stortford Business Connections
Bishop's Stortford Chamber Of Commerce
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 High School
Bishop's Stortford Liberal Democrats
Bishop's Stortford Mencap
Bishops Stortford Montessori Nursery
Bishop's Stortford Museum
Bishop's Stortford Retailers Group
Bloor Homes
Bloor Homes Eastern
Bluestone Planning Ltd
Bobtails Playgroup and Teddy Club
Bovis Homes Ltd
Boyer Planning Ltd
Braughing Playing Field Association Trust
Brendan Boyle Architects
Brian Barber Associates
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 Chamber of Commerce
Buntingford Civic Society
Buntingford Medical Centre
Buntingford Relief in Need Charity
Buntings Nursery
Busy Bees
Busy Bees at Hartham Park
Busy Bees at Thorley Park
Busy Bees Day Nursery at Bishops Stortford
Busy Bees Pre School
CABE
CALA Homes (South) Ltd
Carers in Hertfordshire
Carers in Hertfordshire, South East Team
Castle Joinery
Castlegate Surgery
Caxton Hill Motors Ltd
CBI East of England
CDA for Herts
Cecil Close Residents Association
Central Hertfordshire Green Corridor Group
Central Surgery
Centrebus Ltd
CGMs Consulting
Chaldean Estate
Chantry Community Association
Charles Planning Associates Ltd
Chauncy School
Childrens Nest Day Nurseries
Chips Saturday Club
Christ Church
Christ Church C of E (VA) Primary & Nursery School
Christ Church United Reformed Church
Church Commissioners
Church Farm

Church Street Partnership
Church Street Surgery
Churchfields Children's Centre
Churchfields Kindergarten
Circle Anglia
City & Country Group
City & Country Residential Ltd
City & Provincial Properties PLC
Clocktower
Coke Gearing Consulting
Colliers International
Collins Bros
Collins Farming Ltd
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
CS&HS environment and engineering
Datchworth Pre-School
David G Williamson & Co
David L Walker Limited
David Wilson Homes
Dean Lewis Estates
Deloitte Real Estate
Department for Transport Rail Group
Derrick Wade Waters
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 Ramblers
East Herts YMCA
East of England Ambulance Service NHS Trust
East of England Local Government Association
Edgar Harman & Co
Edward Gittins & Associates
Edwinstree C of E Middle School
ELA Design
Emmanuel Shared Church
Essex County Cricket Board
Essex Wildlife Trust
Exemplas Holdings Ltd
Fairview New Homes Ltd
Fawbert & Barnard Infants School
Fields In Trust
First Capital Connect
Forebury Estates Ltd
Forewind Ltd
Forgetrack Ltd
Foxholes Farm
Framptons
Framptons Planning
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
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
GQ Properties Ltd
Grain & Co. Property Consultants
Grange Builders
Granta Housing Society Ltd
Great Amwell Nursery School
Groundwork Hertfordshire
Grove Cottage Special Needs Nursery
Grove Residents Action Group
Haileybury
Hall Needham Associates
Hallam Land Management Ltd
Hanbury Manor Creche
Hanover Housing Association
Hanscombe House Surgery
Harlow Renaissance
Hastoe Housing Association Ltd (East)
Havers Action Team
Hawksmoor Property Services
Haymeads Residents' Association
Hayter Ltd
Hazel End Farm
HCA
HCC
Health and Safety Executive
Heath Mount School
Hertford and District University Of The Third Age
Hertford Baptist Church
Hertford Civic Society
Hertford Disability Support Group
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 BME Partnership
Hertfordshire Building Preservation Trust
Hertfordshire Careers Services Ltd
Hertfordshire Chamber of Commerce & Industry
Hertfordshire Chinese Class Association
Hertfordshire Community Health Services
Hertfordshire Gardens Trust
Hertfordshire Partnership NHS Trust
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 & North Middlesex Area of the Ramblers
Herts and Essex Mosques and Islamic Cultural Centre
Herts and Middlesex Wildlife Trust
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
Hockerill Anglo- European College
Hollybush Primary School
Hollybush Under Fives
Holy Cross Church
Holy Trinity Church (Hertford)
Holy Trinity Church (Little Amwell)
Home Builders Federation
Home Farm Trust Herts & Essex
Hormead C of E (VA) Primary School
Hormead C of E First School
Hormead Hares FC
Housing 21
HPG Stortford Ltd

Hubert & Leach Ltd
Hunsdon Ducklings
Hunsdon JMI School
Hutchinson 3G UK Limited
Hythe Ltd
Ian Baseley Associates
Iceni Projects Ltd
IDA Nurseries
Immaculate Conception & St Joseph
Indigo Planning
Jack Poulton & Sons Ltd
Jameson & Hill
Januarys Consultant Surveyors
Jarvis Homes Ltd
Jehovah's Witnesses
Jenyns First School and Nursery
John Martin & Associates
Joseph Rochford Gardens Ltd
Jumping Jacks
Kickstart Trust (Bishops Stortford) Ltd
Kier Homes
Kingshill Infant School
Kingsmead Pre School
Kirby Cove Architects
Knightsfield School
L.A. Packing Co Ltd
Labour Party
Lafarge Aggregates Ltd.
Lambert Smith Hampton
Land & County Development
Land Planning Group Plc
Landro Ltd
Layston C of E First School
Layston Pre-School and Nursery
Leapfrogs Pre-School
Leaside Church
Leaside Under 5's Kindergarten
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
Mark Liell & Son
Marksmill LLP
Marlers Estates Ltd
Martineau
Methodist Church (Hertford & Watton-at-Stone)
Metropolitan Housing Trust
Michael J Lodge & Co
Middleton School
Mill Mead Primary School
Millfield First & Nursery School
Millfield Little Stars
Mini Cowpers
Mobile Operators Association
Molewood Residents Association
Montagu Evans LLP
Morgans Playgroup
Morgans Primary School
Much Hadham Church Council
Much Hadham Playgroup
Mullucks Wells
Muslim Prayer Group
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 Trust
Nazeing Parish Council
Netherfield Partnership
Network Housing Group Ltd
Network Rail Property
Newgate Street Society
NFU
Nicholas Kidwell Architect
North Hertfordshire Homes

Northgate Primary School
Oak Grove Residents Association
Oakley Coachbuilders
Objective Corp
Old Road Securities PLC
Openreach Newsites
Optimis Consulting
Orange Personal Communications Services
Orbit Homes (2020) Limited
Orchard House Pre-School
Orchard Surgery
Origin Housing Association
PACE
PALS Pre-School
Papworth Trust Home Solutions
Paradigm Housing Group
Paradise Wildlife Park
Parsonage Residents Association
Parsonage Surgery
Paul Dickinson & Associates
Pegasus Planning Group
Pelham Pre-School
Pelham Structures Ltd
Pellys LLP
Persimmon Homes
Persimmon Homes (Essex) Ltd
Peter J Hamilton & Associates
Phillips Planning Services Ltd
Pigeon Investment Management Ltd
Pinewood School
Planning Perspectives
Planning Potential
PLI Property Developments
Portland Road Residents' Association
Positive Solutions
Presdales School
Princess Alexandra Hospital NHS
Priors Wood Primary School
Protecting Aston's Community Existence (PACE)
Puller Memorial C of E (VA) Primary School
Ralph Sadleir School
Ramblers' Association

Rapleys LLP
Redrow Homes South East
Reedings Junior School
Regal Specialist Industrial Supplies
Religious Society of Friends
RenewableUK
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
Romehold Ltd (a subsidiary of Galliard Homes Ltd)
Royal Mail Group Ltd
RPS Planning and Development
RSPB
Sacred Heart of Jesus & St Joseph Roman Catholic Church
Sacred Heart RC Primary School
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 (UK) Ltd
Savills PLC
Sawbridgeworth Sport Association
Selections Adult Education Programme
Shelter
Shire Consulting
Silver Birches Children's Centre
Simon Balle School
Smiths Gore
Solum Regeneration
South Anglia Housing Association
South Street Surgery
Spellbrook Primary School
Sport England

Springs Christian Fellowship
St Andrew & the Holy Cross
St Andrew's C of E Primary School and Nursery School (Much Hadham)
St Andrew's C of E VC Primary School (Stanstead Abbots)
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 Edmund's College/Prep School
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 Catholic Primary School (Bishop's Stortford)
St Joseph's RC Primary School (Hertford)
St Josephs in the Park Independent Prep School
St Joseph's in the Park School
St Joseph's Playgroup
St Joseph's Pre School
St Leonard's Church
St Margarets Church PCC
St Mary's Catholic School (Bishop's Stortford)
St Mary's VC C of E Junior School (Ware)
St Mary's Church (Hertford)
St Mary's Church (Sawbridgeworth)
St Mary's Church of England (Buntingford)
St Mary's Church (Braughing)
St Mary's Church (Ware)
St Michael's Church

St Michael's C of E (VA) Primary School
St Peter's Church
St Richard of Chichester Church
St Thomas of Canterbury RC Primary School
St Thomas's Catholic Church
St William
Standon and Puckeridge Independent Nursery School (SPINS)
Standon and Puckeridge Surgery
STANDONA120 campaign
Stansgate Planning LLP
Stapleford Early Years
Stapleford Primary School
Stellco Developments Ltd
Stepping Stones Day Nursery
Stewart Ross Associates
STOP Harlow North
Stop Stansted Expansion
Strutt & Parker
Summercroft Primary School
Sunland Nominees Pty Ltd
Sustrans
T Findlay & Sons
Tamil Union of Hertfordshire
Taylor Wimpey Strategic Developments
Taylor Wimpey UK Ltd
TBSHS
Tees Law
Telefonica O2 UK Ltd
Terence O'Rourke Ltd
Tesco
Tesco Stores Ltd
Tetlow King Ltd
Tewin Cowper C of E (VA) Primary School
Tewin Residents Group
Thames Water Property Services
The Bishop's Stortford High School
The Braughing Society
The Catholic Worker Farm (London Catholic Worker)
The Chauncy School
The Co-operative Group (Planning

Department)
The Croft Group Ltd
The Fairfield Partnership
The Gallery at Parndon Mill
The Gypsy Council
The Health Centre
The Hertfordshire and Essex High School and Science College
The Hub Church
The Lawn Tennis Association
The Leventhorpe Foundation School
The Maltings Surgery
The Pines Pre School
The Richard Whittington Primary School
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 Ware Christadelphians
The Ware Society
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
T-Mobile (UK) Ltd
Tonwell St Mary's C of E Primary School
Touchwood Homes
Tower Primary School
Traveller Law Reform Project
Trundles Ltd
Turley
Turnberry Planning
University Of The Third Age
Veolia Water
Vibrant Partnerships

Vodafone
W A Fairhurst & Partners
Waitrose
Walkern Pre School
Walkern Primary School
Ware Museum
Ware Road Surgery
Ware Town Partnership
Ware U3A
Wareside C of E Primary School
Wareside Pre-School
Warwick Road Residents' Association
Watermill Estate Residents' Association
Watton Place Clinic
Watton-at-Stone Playschool
Watton-at-Stone Primary & Nursery School
Westmill Farm
Westmill Nursery
Weston Homes
Wheatcroft Primary School
Widford School
Windhill Children's Centre
Windhill Primary & Nursery School
Windhill21
Wisbey Goodsell
WM Morrisons Supermarkets PLC
Wodson Park Sports Centre
Woodhall Estate
Woods Hardwick Planning Ltd
Youth Create

In addition, 2397 individuals from the Council's District Plan Objective database were consulted via email or post.

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, Luynes 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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COMMENT FORM

Please either use this form or, preferably, use the consultation portal which can be accessed via:

www.eastherts.gov.uk/districtplan

**DRAFT DISTRICT PLAN (PREFERRED
OPTIONS) CONSULTATION
27TH FEBRUARY TO 22ND MAY 2014**

OFFICIAL USE ONLY
REFERENCE.....
DATE REC.....

THE INFORMATION YOU PROVIDE WILL BE HELD ON A DATABASE & USED TO ASSIST IN THE PREPARATION OF PLANNING DOCUMENTS. THE INFORMATION WILL BE USED IN ACCORDANCE WITH THE DATA PROTECTION ACT (1998). YOUR NAME AND COMMENT WILL BE PUBLICALLY AVAILABLE FOR ANY OTHER PERSON TO INSPECT.

PLEASE TICK AS APPROPRIATE
RESPONDING AS AN INDIVIDUAL
RESPONDING ON BEHALF OF AN ORGANISATION
AGENT RESPONDING ON BEHALF OF CLIENT

**WE REGRET THAT WE ARE
UNABLE TO PROCESS ANY
RESPONSES SUPPLIED
WITHOUT CONTACT DETAILS**

PLEASE COMPLETE IN BLOCK CAPITALS
NAME.....
JOB TITLE / DEPT.....
ORGANISATION.....
ADDRESS.....
.....
POST CODE.....
TEL NO. (DAYTIME).....
MOBILE.....
EMAIL.....

AGENTS DETAILS (IF APPLICABLE)
NAME.....
JOB TITLE / DEPT.....
ORGANISATION.....
ADDRESS.....
.....
POST CODE.....
TEL NO. (DAYTIME).....
MOBILE.....
EMAIL.....

PLEASE RETURN TO THE PLANNING POLICY TEAM
ONLINE: www.eastherts.gov.uk/districtplan
BY EMAIL: planningpolicy@eastherts.gov.uk
BY POST: PLANNING POLICY,
EAST HERTS COUNCIL,
WALLFIELDS, PEGS LANE,
HERTFORD, HERTFORDSHIRE,
SG13 8EQ

**COMMENTS MUST BE
RECEIVED NO LATER
THAN 5PM ON:
THURSDAY 22ND MAY
2014**
COMMENTS RECEIVED AFTER THIS TIME
MAY NOT BE CONSIDERED

PLEASE TICK / COMPLETE AS APPROPRIATE

DO YOU WISH TO:

COMMENT

SUPPORT

OBJECT

IS YOUR COMMENT:

GENERAL

SPECIFIC

IF YOUR COMMENT IS SPECIFIC, TO WHICH SECTION
DOES IT REFER?

OFFICIAL USE ONLY

REFERENCE.....

DATE REC.....

PLEASE MAKE YOUR COMMENT HERE AND INDICATE ANY CHANGES YOU ARE SEEKING.
ADDITIONAL SHEETS MAY BE ATTACHED TO THIS FORM.

Consultation Portal Guidance Note

It is easy to enter your comments online using the Council's Consultation Portal using the instructions below.

You can either follow the link from the Council's website: www.eastherts.gov.uk/districtplan or use the direct link: <http://consult.eastherts.gov.uk>

Registering and Logging in to the Consultation Portal

The screenshot shows the 'Consultation Portal' interface. At the top right, there are links for 'Accessibility', 'Privacy', 'East Herts District Council', and 'Contact Us'. Below the search bar, there is a 'Login / Register' button. A 'Login' form is displayed, with fields for 'Username' and 'Password', and a 'Login' button. A green circle highlights this form. Below the form, there are links for 'Register', 'Forgotten Password?', and 'Forgotten Username?'. A table of consultations is visible below the form, with columns for 'Consultation', 'Start', 'End', and 'Status'. The table lists several consultations, all with a status of 'closed'.

Consultation	Start	End	Status
Bishop's Stortford North Interim Planning Brief	01/07/13 16:00	16/08/13 17:00	closed
Draft Statement of Community Involvement	21/03/13 00:01	02/05/13 17:00	closed
Mead Lane Urban Design Framework	16/06/11 00:00	28/07/11 17:00	closed
East Herts Core Strategy Consultation	02/09/10 10:00	25/11/10 17:00	closed

1. Log in or register on the site to make your comments. If you have already registered go to point 7 below. If you have previously registered but forgotten your details you may need to contact the Planning Policy Team.

2. Choose whether you are responding as an individual/on behalf of an organisation or whether you are representing a client.

The screenshot shows the 'Registration' section of the Consultation Portal. It explains that registering has many key benefits, including the option to participate in "sign-in required" consultations and the ability to save, track and manage your comments. Two registration options are presented: 'Consultee' and 'Agent'. Both options are circled in green. The 'Consultee' option is for those who wish to make comments expressing their own opinions or the opinions of their organisation. The 'Agent' option is for those who will be making comments on behalf of other individuals or third-party organisations. Below each option is a 'Register as [Consultee/Agent]' button.

3. Complete contact details and click ok.

Consultee Registration

Please complete the following information and select OK. We will then send you an activation email to confirm your account.

My Account

Name & Email

Title

Given Name

Family Name

Email Address

Username

Password

Confirm Password

I agree to all of the [Terms and Conditions of registering](#) Yes No

* denotes required field

4. There may be others already using the Objective Consultation system with a similar name so it may take more than one attempt to create a username.

5. You will receive an email notification. Important: You must follow the link from your acknowledgement email to complete your registration.

6. You will be asked to answer a series of questions, such as age range and interest. These are designed to enable officers to undertake statistical analysis only. No data provided is used for any other means.

Viewing and Making Comments

7. Click the title of the Draft District Plan Preferred Options Consultation 2014

Consultations

Show Consultations for: All Topics

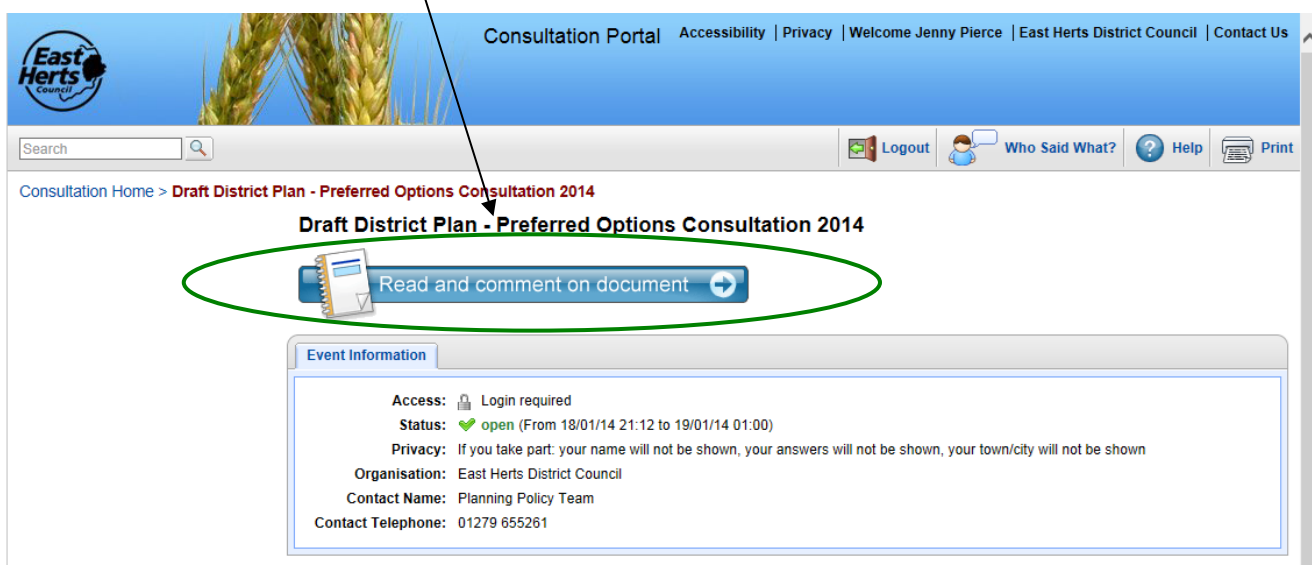
List View Date View

Consultation	Start	End	Status
Bishop's Stortford North Interim Planning Order	01/07/13 16:00	16/08/13 17:00	closed
Draft Statement of Community Involvement	21/05/13 00:01	02/05/13 17:00	closed
East Herts Core Strategy Consultation	02/08/11 10:00	25/11/10 17:00	closed
Mead Lane Urban Design Framework	16/08/11 00:00	28/07/11 17:00	closed

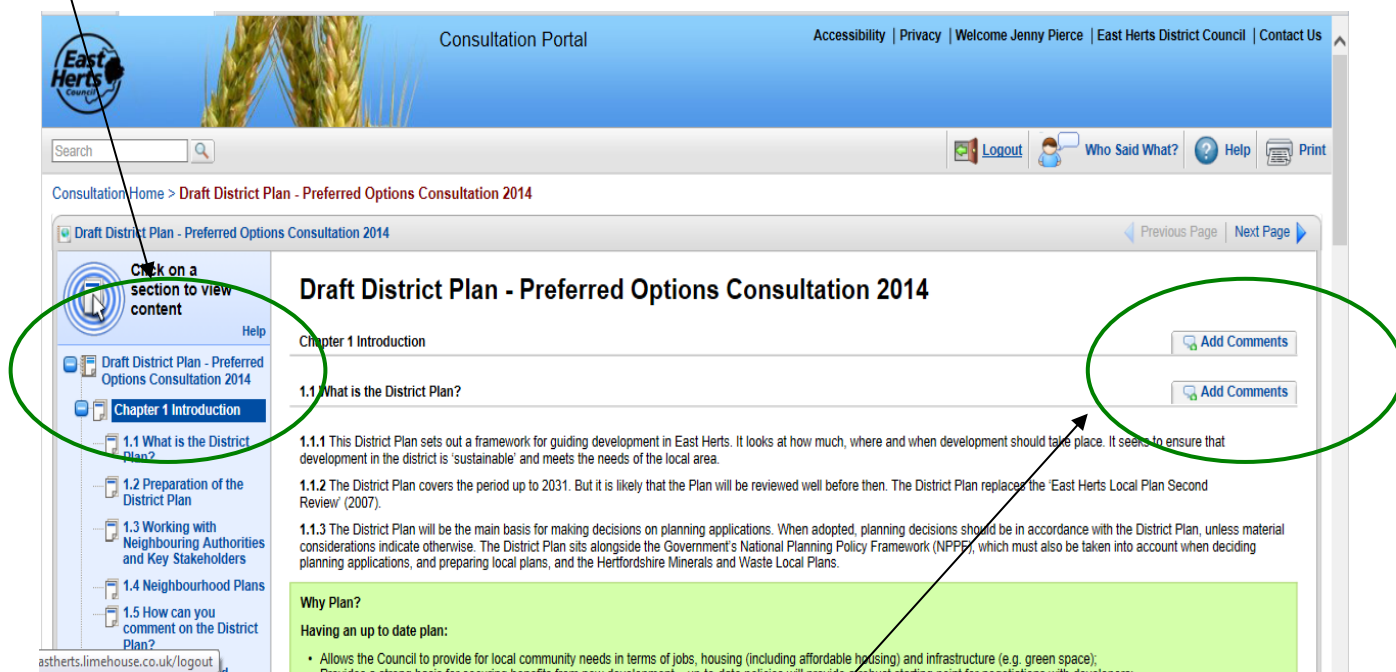
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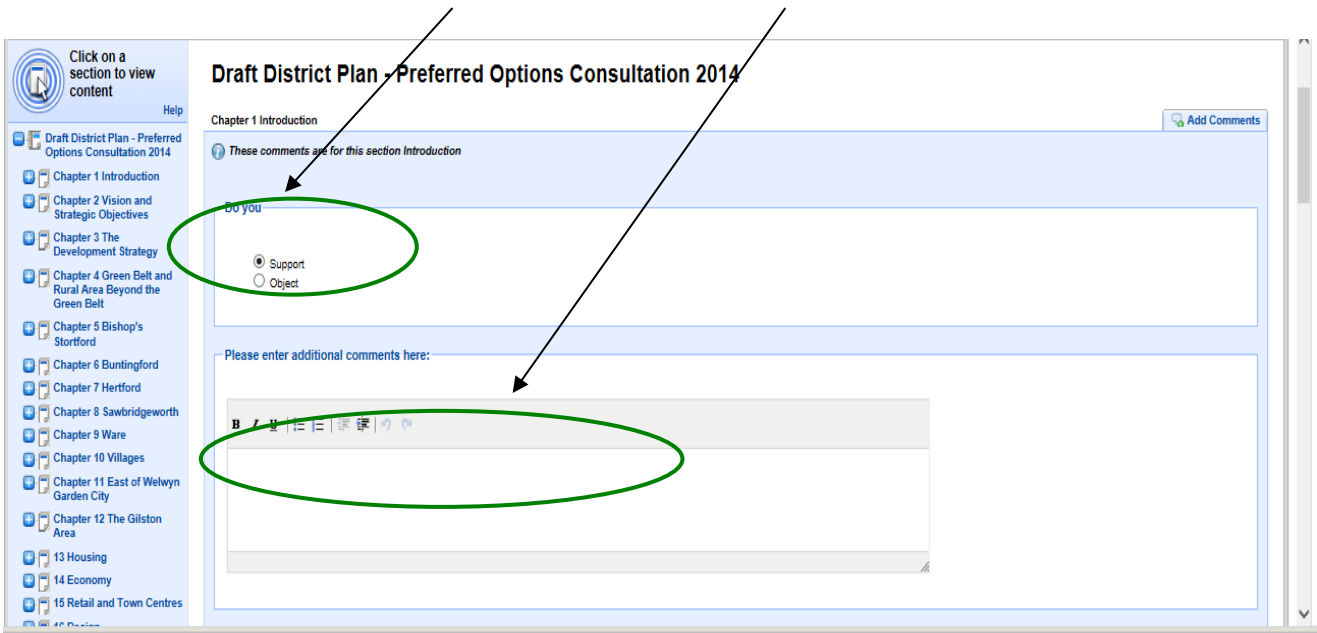


9. You can navigate around the document using the table of contents. Click the plus sign to expand the menu for sub-sections

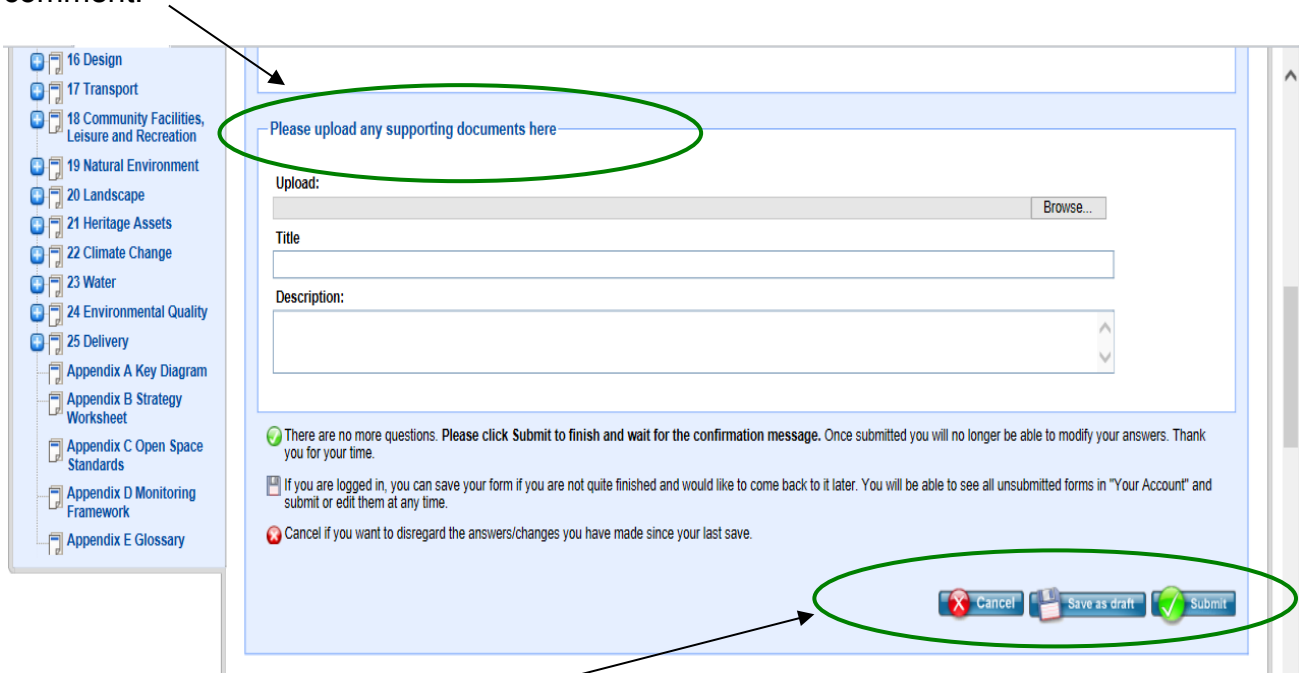


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11. You can choose to support or object and, if you wish to supplement this, you can enter additional comments.



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13. Finally, once you have finished adding your comment you can choose to save it as a draft to complete later or submit the comment. If you choose to save to draft, remember to return at a later time and submit your comments or they will not be registered. Once submitted you will be unable to change your comment and it will become visible to others once an initial processing stage has been undertaken by the Council.

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15. A Site Tour is also available on the Consultation Portal home page if you would like further information on completing your registration and entering comments.

East Herts Draft District Plan: Frequently Asked Questions (January 2014)

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1 What is the current Plan?

- 1.1** The Local Plan 2007 is the current statutory development plan for the district, together with the Minerals and Waste plans prepared by Hertfordshire County Council. It includes a number of site allocations, as well as development management policies, and policies relating to specific designations such as employment areas, leisure and recreation, and Green Belt. It also contains place-specific policies covering the towns and villages. It can be found at www.eastherts.gov.uk/localplan. The Local Plan is used as the basis for decisions taken by the on planning applications. Legislation requires that decisions on planning applications are made in accordance with the development plan, unless material considerations indicate otherwise. Material considerations are all other relevant planning issues that could be taken into account.

2 Why do we need a Plan?

- 2.1** A plan ensures that there is clarity about where and how much development will happen in the future. This enables local people and businesses to make decisions about their own activities. The 2007 Local Plan is now out of date and although the majority of the topic-based policies are saved (or still legally relevant), there is no plan to identify locations where development should be focused.
- 2.2** Having a plan also means that ‘larger than local’ decisions to do with infrastructure planning can be addressed between all the relevant bodies. For example, investment in utilities and hospital facilities may take many years to plan and build. Since there is no longer a County or regional-wide plan in place that would manage issues such as infrastructure which affect several districts or boroughs, the District Plan will provide important information to enable the relevant parties to make infrastructure enhancements. It will also allow the District Council to lobby central government and other funding bodies as necessary to provide the necessary infrastructure to support growth.
- 2.3** Without a plan it is likely that development proposals would be advanced which may be inappropriate in terms of their location and poorly supported by infrastructure. Should the Council refuse proposals of this nature and in the absence of more appropriate development, there would be significant risk of applicants making successful appeals to the Planning Inspectorate to overturn the Council’s decisions. This would be an expensive and time consuming process.

3 Where is the evidence underlying the Plan?

- 3.1** The evidence can be found in five main locations on the Council's website:
- Technical studies: www.eastherts.gov.uk/technicalstudies
 - A Supporting Document explains the process of defining and shortlisting options: www.eastherts.gov.uk/supportingdocument
 - The Interim Development Strategy Report draws on the evidence in the Supporting Document and the Technical Studies and explains the selected strategy: www.eastherts.gov.uk/strategyreport
 - An Infrastructure Topic Paper explains the approach to infrastructure planning and the further work to be done before Examination in Public (a public meeting with a Planning Inspector to discuss the proposed plan): www.eastherts.gov.uk/infrastructure
 - The Sustainability Appraisal of the draft District Plan assesses alternative options: www.eastherts.gov.uk/sa
- 3.2** The evidence underlying the plan runs to thousands of pages, but is considered proportionate to the needs of a plan which covers the whole district and beyond. All the evidence will be clearly signposted as part of the consultation on the Draft District Plan. A presentation setting out the background and approach to the development strategy was delivered to the District Planning Executive Panel on 16 January 2014. A copy of the presentation and link to the webcast is available at www.eastherts.gov.uk/districtplan.

4 What is the scope of the Plan?

- 4.1** Most detailed issues can only be addressed in relation to specific proposals put forward in a planning application and scrutinised through the Development Management process. The District Plan should be viewed as part of an end-to-end process. It sets the overall framework for development, but there will be issues specific to a particular site or planning application that need to be considered in addition to the District Plan. Examples of issues which are beyond the scope of the plan include detailed environmental health issues, ecological surveys, and detailed transport and infrastructure issues.

5 Who has made the decisions on the draft Plan?

- 5.1** East Herts Council is the Local Planning Authority and its responsibilities include production of a statutory plan to guide development. Officers prepare the plan, but have no power to make decisions.
- 5.2** All decisions are made by Full Council, comprising all 50 elected Ward Members of East Herts Council. All work on the District Plan has been presented to the District Planning Executive Panel for scrutiny before being

passed to the Executive and then Full Council. The District Planning Executive Panel is open to all East Herts Members to attend and ask questions. The sessions are all public meetings. The agendas, Minutes, and webcasts are all posted on the Council's website.

- 5.3** The District Planning Executive Panel is constituted of three Members of the Executive: Councillor Mike Carver, Executive Member for Strategic Planning and Transport and Chair of the Panel, Councillor Linda Haysey, Executive Member for Health, Housing, and Community Support, and Councillor Suzanne Rutland-Barsby, Executive Member for Community Partnership and Liaison. The three Members of the Panel make recommendations to Executive and Full Council but do not make policy decisions.
- 5.4** The draft Plan has 'emerged' from the evidence and national policy requirements, as the outcome of a rigorous and transparent process, rather than being 'chosen' by any individual or group of individuals. All the evidence is on the Council's website at www.eastherts.gov.uk/districtplan, along with links to webcasts and Minutes of all relevant Council meetings.
- 5.5** The Council is constrained by the requirements of the National Planning Policy Framework (NPPF) and the legal system within which planning operates. Compliance with the NPPF is assessed at Examination in Public presided over by a government-appointed Planning Inspector before the Council can adopt the plan. The Inspector may recommend the Council to change any aspect of its plan which is not in conformity with the NPPF or other legal and planning requirements. The Council is undertaking a robust and comprehensive process of plan preparation in order to avoid having to withdraw the plan at the last stage. Failure to follow the Inspector's recommendations would mean that, should the Council nevertheless decide to adopt the plan unchanged, it would be at very high risk of challenge through the courts.

6 Have alternative options been considered?

- 6.1** Yes. The Council has assessed 69 'areas of search'. The details of the assessments are set out in the Supporting Document to the District Plan (see Question 3). The rejected options were assessed through a Sustainability Appraisal of the selected options.
- 6.2** Alternative district-wide growth levels have not been considered as part of the Sustainability Appraisal process because the Council is required to make every attempt to meet its housing requirements (see point 8 below).

7 Why is the Plan housing-led? What about employment?

- 7.1** Whilst East Herts has a strong SME (Small and Medium Sized Enterprise) sector, its main economic role is in terms of the sub-regional labour market, providing many workers for major employment centres outside the district, including Stansted Airport, Hatfield Business Park, Stevenage, Harlow, Cambridge, and of course London.
- 7.2** Many skilled professional workers are attracted to East Herts as a place to live by the high quality of life on offer here. The combination of pleasant places to live with skilled job availability provides the foundations of the sub-regional economy.
- 7.3** The East Herts plan should therefore be understood as complementary to plans for economic development in neighbouring districts. Stevenage, Harlow, and Broxbourne all have aspirations to grow their employment offer.
- 7.4** It should be remembered that many of the businesses of East Herts itself depend on local customers, and that there is a strong link between local customers and vitality of the shopping centres. Development in the district will also assist local businesses to grow, by supporting the provision of small but well-located opportunities for new employment land throughout the district.
- 7.5** Further information is available in the Council's Strategic Economic Development Advice (2012). This can be found using the Technical Studies link detailed in Question 3.

8 Can the Council reduce the amount of housing and development proposed in the Plan?

- 8.1** No. One of the Core Principles of the National Planning Policy Framework is that *“every effort should be made objectively to identify and then meet the housing, business, and other development needs of an area, and respond positively to wider opportunities for growth”*. For East Herts the objectively assessed need amounts to 15,000 homes over 20 years according to official statistics published by the Department for Communities and Local Government. Whilst some local planning authorities may be able to make a case that a reduction in housing supply is justified due to particular constraints, the projected level of housing need itself cannot be adjusted, and is the starting point for consideration. Indeed, under the Duty to Co-Operate contained within the Localism Act 2011 and applied through the NPPF, such authorities would need to find another Council willing to accept the unmet housing need by providing additional sites on their behalf. In the case of East Herts, such an approach would not be reasonable given the availability of other otherwise suitable sites within the District.

- 8.2** Were the Council to seek to reduce the level of housing it would almost certainly be found unsound by a Government-appointed Planning Inspector at Examination in Public. This would result in substantial costs to local taxpayers and would mean that there would not be a framework in place to promote development where appropriate, and restrict it where inappropriate (see question 2 above).

9 Will the necessary supporting infrastructure be provided in a timely fashion?

- 9.1** East Herts Council has prepared the draft District Plan but is reliant on external providers to deliver the majority of the critical infrastructure and services to support development. The Council's role involves dialogue and co-ordination, but is not itself able to commit to delivery of infrastructure. For this reason the Council's plan needs to include a degree of flexibility and monitor the changing position in relation to infrastructure delivery over time.
- 9.2** Whilst there is always an element of uncertainty around infrastructure provision over such a long time period, there is a reasonable level of confidence that the infrastructure can be delivered. Further work over the coming year in the lead-up to examination will assemble further evidence in this respect. The Infrastructure Topic Paper sets out the key issues, and these will be worked up further through a Delivery Study leading to an Infrastructure Delivery Plan to support the District Plan at Examination in Public.
- 9.3** In some cases, critical infrastructure such as new schools will need to be built, and this will take a number of years. In such cases interim solutions to expanded school capacity are normally available to enable the gradual scaling up of capacity to the point where the new school can be filled. The plan also identifies options for potential provision of new school sites, which have the capacity to grow and expand over time. The provision of new sites is essential to enable the provision of high-quality educational facilities, given the identified limitations to the amount of capacity which can be provided at existing schools. The draft plan identifies potential new secondary school sites at Bishop's Stortford, the Gilston Area (north of Harlow), north of Ware, and east of Welwyn Garden City.

10 What about water supplies and waste water capacity?

- 10.1** The Council has worked with Affinity Water as the water supply company and Thames Water as the waste water company.
- 10.2** Supported by Affinity Water and the Environment Agency, the draft District Plan includes water efficiency targets for new development in excess of Building Regulation requirements and seeks to address concerns over water

pressure in some locations. However, East Herts Council has expressed concerns to Affinity Water and the Department for the Environment, Food and Rural Affairs (DEFRA) in respect of the company's draft Water Resources Management Plan (WRMP), which relies on increased water efficiency measures to offset the projected increase in consumption from population increases. The issue of water resources is a matter for the national regulatory framework. The Planning Inspectorate does not view general water resources issues as a reason to reduce the housing requirement. Reflecting this, the Council cannot view water supply issues as a basis for seeking to lower the amount of development in the plan.

- 10.3** Thames Water operates the waste water network and sewage treatment facilities. The company has advised that there is currently capacity in the network. The company has also advised where new sewers and upgraded treatment works will be needed to support development. Promoters in the Gilston Area (north of Harlow) have proposed a new sewage treatment works. Further details are provided in the Infrastructure Topic Paper.

11 What about transport impacts?

- 11.1** East Herts Council takes advice on transport matters from Hertfordshire County Council as transport and highway authority for the county. Advice has also been sought from the Highways Agency, which is responsible for the motorway network, and from Essex County Council, since aspects of the draft plan will have impacts beyond Hertfordshire. Transport modelling has been undertaken to inform the plan-making process and understand the cumulative impacts of development not just in East Herts but also across administrative boundaries.
- 11.2** Paragraph 32 of the NPPF states that "*development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe.*" The Council is not aware of any other examples where the Planning Inspectorate has accepted transport severity as a reason to reduce the level of development in a Local or District Plan. Highways safety rather than speed of traffic flow is emerging as the main concern of the highways and transport authorities. This will need to be kept under review as work on the plan progresses and further evidence is assembled.
- 11.3** Hertfordshire County Council has provided a Transport Update (November 2013) which sets out the available evidence in relation to the options underlying the draft District Plan. Further work will be produced during 2014. However, the District Plan is an early part of the end-to-end planning process (see Question 4). Detailed assessment of site-specific transport matters occurs through a Transport Assessment as part of the planning application process.

- 11.4** The proposed Development Plan Documents (see below) at strategic scale growth locations will allow for further detailed testing of transport impacts, working with landowner and developer transport consultants.

12 Have landowners and developers been involved in the strategy selection process?

- 12.1** In order to produce an effective plan it is essential to take into account whether there is any party that will actively bring a site forward, what they are proposing, and what other information they may have which could inform the plan. Given the large number of site options remaining at shortlisting stage (summer 2012) a questionnaire was issued to all known owners and responses were collected and reviewed. There have been no direct meetings between site owners and Planning Officers or Members from East Herts Council. However, the Council asked ATLAS, the Homes and Communities Agency's planning experts, to gather further information through targeted landowner meetings, sufficient to the requirements of this stage in the plan-making process. The notes of all these meetings, and the landowner responses to the questionnaire, are all on the Council's website at www.eastherts.gov.uk/developerinfo.

13 Why does the plan include development in the Green Belt?

- 13.1** The National Planning Policy Framework (NPPF) requires all Local Planning Authorities to make every effort to meet their objectively assessed housing needs (see question 8 above). Housing and development needs may constitute the required exceptional circumstances to review the Green Belt. Local Planning Authorities have the power to review the Green Belt in their Local or District Plans.
- 13.2** Housing need in East Herts amounts to 15,000 dwellings. Within the existing built-up areas of the towns there is capacity to accommodate around 1,500 dwellings at identified sites, with around another 1,200 at 'windfall' sites (i.e. permissions granted at previously unidentified sites through property conversions and demolitions for example). Whilst the northern part of the district includes areas not in the Green Belt, delivering the required level of development in this area, away from the infrastructure and facilities of the main towns, would not represent a sustainable or achievable development strategy.
- 13.3** The Council has undertaken a Green Belt Review technical study which assesses the role of all areas of the District's Green Belt against the purposes of Green Belt as a strategic planning tool, as set out in the NPPF, and looked in detail at potential boundaries at those locations shortlisted by the Council for further study (see the Supporting Document).

- 13.4** The Interim Development Strategy Report takes account of the technical recommendations of the Green Belt review and compares this with national housing requirements, which form the exceptional circumstances needed to justify Green Belt release. The proposed new Green Belt boundaries are shown on the draft Policies Map which accompanies the draft District Plan.

14 How can the Draft District Plan include development north of Bishop's Stortford when this is currently the subject of planning applications?

- 14.1** The District Plan addresses the principles of development with regard to scale and location of development over the long term. The current planning applications are advancing specific development proposals put forward by the landowners and developers. They are being assessed within the context of the Local Plan 2007, the National Planning Policy Framework and all relevant material considerations. The draft District Plan is informed by a review of relevant evidence from the planning application process. This review has confirmed that there are no in-principle reasons why development north of Bishop's Stortford should not be included as a site allocation within the plan, irrespective of the Council's decisions in relation to detailed matters of the planning application.

15 Didn't the Council previously reject the County Council's schools proposals south of Whittington Way, Bishop's Stortford?

- 15.1** Yes. The Council rejected the proposals within the context of the Local Plan 2007. The Planning Inspector and Secretary of State agreed that Hertfordshire County Council had not sufficiently explored alternative options for school expansion to justify the very special circumstances to allow development to take place in the Green Belt.
- 15.2** There is currently no finalised strategy in place from the County Council, as the local authority with responsibility for education in Hertfordshire, to ensure the provision of education capacity in the town. Until such time as this issue has been resolved, it is necessary for the District Plan to keep open the range of possible options for the provision of enhanced educational capacity in the town. Since this land has been identified as a possible residential development site, that includes the possibility of educational development here.
- 15.3** Aside from school provision, the other major consideration relates to housing requirements arising from the National Planning Policy Framework (NPPF). The NPPF requires Local Planning Authorities to meet their housing needs, particularly in the first five years (2016-2021). The Council has had regard

to the impact on the Hertfordshire Way, a footpath which runs through the site, and the sloping nature of the site amongst other considerations. However, in the absence of less harmful sites elsewhere, and considering the unmet need in the Housing Market Area, these concerns are considered to be outweighed by NPPF housing requirements.

- 15.4** A Housing Market Area is the geographical area which is relatively self-contained in terms of reflecting people's choice of location for a new home. They are often based upon travel-to-work routes along major transport networks.

16 Doesn't the Council oppose development north of Harlow any more?

- 16.1** The Council opposed the imposition of large-scale development north of Harlow through the East of England Plan (the now revoked Regional Plan for the eastern counties of the UK), and endorsed the conclusions of the Independent Panel which rejected the concept. However, the Panel's recommendations were subsequently rejected by the Secretary of State, who retained the policy to enable development here in the final Regional Plan. East Herts Council has reiterated its opposition to development north of Harlow since that time.
- 16.2** However, all Local Planning Authorities are obliged to make every effort to meet their housing needs (see Section 8 above). After extensive consideration of the full range of options, and taking unmet need into account, development in the Gilston Area (north of Harlow) is considered to be the least unfavourable location where those needs could be met to achieve the housing requirement in full. The alternatives have been examined through the strategy selection process and sustainability appraisal (see Section 6 above) and are either not feasible at the present time, or are less sustainable.
- 16.3** The Localism Act 2011 contains a Duty to Co-Operate which requires Local Planning Authorities to take account of the needs of their neighbours. Harlow Council supports large-scale growth in the Gilston Area (north of Harlow), providing that the necessary supporting infrastructure is provided. Harlow Council's aim is to attract skilled workers to the local area and achieve critical mass to enable the transformation of the town. This position has been confirmed through a recent meeting of Councillors. The agreed notes of all Duty to Co-Operate Meetings held with neighbouring authorities are available on the Council's website.
- 16.4** If East Herts Council were to proceed to Examination in Public of its own Plan without being able to demonstrate that it has reasonably considered Harlow Council's aspirations, in the absence of demonstrable evidence, then it is likely the plan will be found 'unsound'. Failure to do so would mean that

East Herts Council would fail the Duty to Co-Operate and would fail against housing requirements, and so the Council could not produce a plan to guide development anywhere in the district.

- 16.5** Whilst issues remain with regard to highways and transport matters in relation to development at land north of Harlow it is understood that the modelling to date does not provide sufficient evidence to demonstrate that transport solutions could not be found. Therefore, the transport authorities will need to commit to further work to assess potential transport solutions, and to appraise possible solutions based on a mix of schemes put forward by the developers.
- 16.6** Harlow Council and East Herts Council agree that development to the north of Harlow should not come forward without the supporting infrastructure, and recognise that the transport issues remain unresolved. Harlow Council is concerned about the potential impact of large-scale development on the Harlow road network without the necessary transport infrastructure.
- 16.7** In order to comply with the Duty to Co-Operate, and to ensure rigorous and transparent testing, the Council is proposing to produce a further Development Plan Document (DPD) to cover the area. A DPD is much like a smaller version of a District Plan for a specific location or issue. They are subject to consultation and examination in the same way as the District Plan. The DPD will provide the opportunity for further investigation of the feasibility of development in the Gilston Area (north of Harlow), in consultation with Harlow Council, landowners and developers, Town and Parish Councils and other stakeholders as necessary to ensure a robust framework for considering whether growth is feasible and if so, what scale and form it should take.
- 16.8** If work on the DPD demonstrates that large-scale development in the Gilston Area (north of Harlow) is not feasible, the Council will need to be ready with other development options elsewhere in the district. The draft District Plan contains strong policies to ensure that development does not come forward until there is sufficient evidence to demonstrate that it is sustainable with regard to infrastructure. In the meantime the Gilston Area (north of Harlow) will remain in the Green Belt until at least until the DPD is adopted.

17 What is the role of Localism and Neighbourhood Planning in the District Plan?

- 17.1** Any Neighbourhood Plans coming forward in the future will need to be in conformity with the District Plan. The draft District Plan will provide a strategic framework within which Parish Councils may prepare a Neighbourhood Plan, should they wish to do so. The District Plan framework provides considerable scope for communities to get involved in local decisions about the location and design of development within each settlement.

- 17.2** Prior to adoption of the District Plan, Neighbourhood Plans will need to be in conformity with the Local Plan 2007. In preparing the draft District Plan, East Herts Council has taken account of the emerging Neighbourhood Plans, as well as non-statutory Parish Plans.
- 17.3** For planning to function, there needs to be a strategic planning tier to enable joined-up decisions about larger-than-local planning issues (see Question 2: Why do we need a plan?). The Government has decided that Districts and unitary authorities are the most appropriate level for strategic plan-making, combining democratic scrutiny from locally elected Councillors with a perspective on strategic issues above settlement level. The Localism Act 2011 contains a number of provisions which embed this strategic planning requirement, including the Duty to Co-Operate.
- 17.4** During 2014 East Herts Council will consider what advice or support it is able to offer to Town and Parish Councils wishing to prepare Neighbourhood Plans. This will update the 2011 Neighbourhood Planning Guidance Note www.eastherts.gov.uk/neighbourhoodplanning

18 What is the difference between a site allocation and a broad location for development?

- 18.1** These are both policy designations found in Paragraph 157 of the National Planning Policy Framework (NPPF). This states that Local Plans should:
- “indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;*
 - “allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate”*
- 18.2** The draft District Plan Key Diagram shows Site Allocations as red areas and Broad Locations as orange stars enclosed by a dotted line in the form of an ellipse to indicate the general broad extent of the area under consideration without defining a boundary.
- 18.3** Site allocations have defined boundaries on the Key Diagram and on the Policies (Proposals) Map, and each is supported by a policy which will be used in the consideration of applications by the Council. Planning applications for site allocations will be encouraged in accordance with the policies set out in the District Plan.
- 18.4** Broad locations do not have identified site boundaries and further work will be required to determine the practicalities of delivery. District Plan policies on the Broad Locations will set out the high-level issues and define the scope

of the DPD. Planning applications in relation to the Broad Locations are not encouraged until a full planning framework is in place in the form of a DPD (see below).

- 18.5** Three Broad Locations for Development are identified in the draft District Plan: the Gilston Area (north of Harlow), North and East of Ware, and East of Welwyn Garden City. Each of these sites has outstanding issues which will need to be tested further. There is also uncertainty at each of these locations about the scale and mix of development, and in the case of Welwyn and Harlow, how it may relate to other strategic development in the area. All this will need further testing through a DPD (see below).
- 18.6** In the case of both Site Allocations and Broad Locations there will need to be a considerable amount of evidence gathered by the site promoters and submitted to the Local Planning Authority in support of any planning application.

19 What is the difference between a DPD and an SPD?

- 19.1** A Development Plan Document (DPD) is a statutory document prepared in accordance with Section 38 of the Planning and Compulsory Purchase Act 2004. A DPD must comply with the plan-making regulations for consultation and Examination in Public prior to adoption as policy by a Local Planning Authority. The East Herts Local Plan 2007 and the proposed District Plan are examples of DPDs.
- 19.2** The draft District Plan proposes a DPD to address the three Broad Locations for Development. A DPD will ensure that there is an appropriate vehicle for thorough testing of the Broad Locations, including options for scale, mix and infrastructure provision. Given the complex and challenging nature of delivery at these locations a DPD will offer an open and transparent basis for evidence gathering and testing with a range of stakeholders including the site promoters, Town and Parish Councils, and others as appropriate.
- 19.3** A DPD is considered an appropriate policy vehicle to support the Broad Location designation, to enable the Local Planning Authority to retain control and ensure that local communities have a stake in the development process.
- 19.4** In relation to SPDs, the National Planning Policy framework (NPPF) Glossary states: *"Supplementary planning documents: Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan... (Paragraph 153): Supplementary planning documents should be used where*

they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development."

- 19.5** Two SPDs are proposed in the District Plan to support the site allocations for large sites to the north and south of Bishop's Stortford. These will enable detailed consideration of design and layout. For Bishop's Stortford North, it may be that a decision has already been made and resolved prior to Examination of the District Plan. However, it may also be the case that there will still be outstanding matters to address through further planning applications, and therefore the option to move forwards with an SPD linked to a policy in the District Plan DPD.
- 19.6** As with the DPDs, the SPDs will be subject to public consultation and working with stakeholders including site promoters, Town and Parish Councils, and others as necessary.

20 What is the difference between a Group 1 village and a Group 2 village?

- 20.1** These are both local policy designations forming part of the proposed strategy for the District Plan. They have been introduced as a way of identifying the more sustainable villages with a wider range of services and facilities which are capable of accommodating some development.
- 20.2** Group 1 villages are those considered capable of accommodating a 10% increase in dwellings over the 2011 Census (when these figures are aggregated and published by Hertfordshire County Council). They are shown on the Key Diagram as orange circles with a black dot in the middle.
- 20.3** Group 2 villages are villages with a smaller range of services or which are otherwise constrained, and are considered to be capable of accommodating infill development only. No specific housing requirement will be apportioned to these villages, although it is expected that some development will be acceptable.
- 20.4** All other villages will be identified as Group 3 villages, in which being the smallest villages, no development beyond that which is appropriate in the Green Belt and Rural area Beyond the Green Belt would be acceptable.
- 20.5** It is anticipated that the Group 1 villages combined will be capable of providing around 500 new homes by 2031.
- 20.6** When the District Plan is adopted the Group 1, Group 2, and Group 3 designations will replace the Category 1, 2 and 3 village designations in the Local Plan 2007.

21 What are the guiding principles behind the Plan?

21.1 In addition to the Core Principles and requirements of the National Planning Policy Framework (NPPF), a set of locally derived Guiding Principles are set out in Section 3.3 of the Draft District Plan. These are as follows:

1. To seek to meet the housing requirement within each housing market area, even where local constraints mean that each settlement may not be able to meet its own needs;
2. To prioritise the development of brownfield land and other appropriate sites within the urban areas of the settlements, but to avoid over-development of such sites;
3. To promote self-containment by directing development to areas where there is reasonable proximity to services and facilities, and which reflect existing travel to work areas, school catchments, and retail spend patterns and functional geographies;
4. Wherever possible to utilise readily available features to provide clear and unambiguous Green Belt boundaries;
5. To allocate development sites unless there are clear planning reasons for not doing so, in order to provide clarity and certainty for local people, businesses and the development industry;
6. To co-operate with adjoining authorities on cross-boundary strategic matters where it is reasonable to do so;
7. To focus development in locations where the impacts on the historic and natural environment are minimised;
8. To acknowledge that in the long term, the capacity for the market towns and villages to grow is constrained by the existing capacity and future potential of these settlements, and therefore long-term planning will need to look towards large-scale strategic development options;
9. To protect and enhance the rural area and the Green Belt outside the allocated development areas to preserve the countryside and the rural character of the District;
10. To encourage limited small-scale development in and around the identified villages, with an opportunity for neighbourhood planning to influence the type and location of development sites.

22 How can I have my say?

22.1 There is a statutory requirement on Local Planning Authorities to consult for 6 weeks. East Herts Council will be consulting on the draft plan for 12 weeks in spring 2014. The Council's agreed procedure for handling consultations is set out in the Statement of Community Involvement (SCI).

22.2 A 'reference only' copy of the Draft District Plan can be seen at all local libraries, leisure centres, Town Council offices and the District Council offices in Hertford and Bishop's Stortford. The Draft Plan and all supporting

documents can be viewed online at www.eastherts.gov.uk/districtplan. Alternatively direct access to the consultation portal is via <http://consult.eastherts.gov.uk> (note: no 'www'.) You can also register online to receive updates on the progress of the Plan.

- 22.3** Comments should preferably be made online via the consultation portal. Alternatively, you can email us at planningpolicy@eastherts.gov.uk or write to the Planning Policy Team at East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ.
- 22.4** You can also download a standard Comment Form from the website and printed copies will be available at all locations listed above.
- 22.5** All comments should be received by **5pm on Thursday 22nd May 2014**. The Council cannot guarantee that comments received after this time will be considered.
- 22.6** If you have any further questions on the Draft District Plan, please contact the Planning Policy Team on 01279 655261 or email at planningpolicy@eastherts.gov.uk.

Draft East Herts District Plan: Frequently Asked
Questions for a Younger Audience (January
2014)

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1 What is a District Plan?

- 1.1 The Local Plan 2007 is the current plan for the district, along with other plans prepared by Hertfordshire County Council. It includes a number of locations where the Council has planned for development to go, as well as policies that explain what type of development this should be. It may be found at www.eastherts.gov.uk/localplan. The Local Plan is used as the basis for decisions taken by the Development Management Committee, where decisions are made as to whether plans for new homes or businesses should be allowed to be built.
- 1.2 This Local Plan is now getting old and no longer works well, so we need to replace it with a new one called the District Plan. The new District Plan is similar but has been updated to allow us to plan to 2031. It maps where the Council thinks new development should go and the type of development this should be. It provides a framework for what new development should provide, such as new homes, schools, parks and playgrounds and places for people to work for example.
- 1.3 At this stage, the Council has made a draft plan setting out its ideas on what the new plan should contain. We would like people to read it and tell us whether they like the ideas or not. This is called a consultation exercise.

2 Why do we need a Plan?

- 2.1 It is important that people understand how many new homes and jobs there should be and where they should be. This way the people who provide services such as schools, doctors and dentists, for example, know where they need to build new services.
- 2.2 As it takes a long time to plan and build new roads, schools and hospitals, once we know where development should be they can get started as soon as possible to make sure they are ready for when new homes are built. The District Plan also allows the Council and those building new roads and schools for example, to ask others to help pay for them as they are very expensive.
- 2.3 We think people should be able to walk to shops or schools and not have to drive everywhere. But sometimes that means making towns and villages a bit bigger and the Plan decides the best place for this to happen and prevent new buildings being built in the wrong places.
- 2.4 Trees, woodlands, rivers and open spaces provide places (or habitats) for birds, animals and special rare plants to live. If these habitats are lost as a result of new buildings being built, these birds and animals will have nowhere to live and we will also lose the rare plants and special environments. Trees and woodlands help to keep the air clean, and parks keep us healthy so we need to make sure there are new trees planted and parks to play in. We don't want homes to flood when it rains for a long time, so the plan prevents new buildings being located close to rivers.

where we think flooding might happen. We also think new buildings should be built in a way that reduces the need to put the heating on, and which use new technology such as solar panels which turn sunlight into electricity.

- 2.5** The District Plan cannot plan for everything but when people want to build in places we don't think is right, then a Planning Inspector can use the plan to decide what should happen.

3 How have we worked out what should be in the District Plan?

- 3.1** We have done lots of research and thought about a lot of things before making this Plan. We have made a lot of documents called technical studies, which explain what we have considered and these can all be found on the Council's website by using the following web addresses:

- Technical studies: www.eastherts.gov.uk/technicalstudies
- A Supporting Document explains the process of choosing the options in the Plan: www.eastherts.gov.uk/supportingdocument
- The Interim Development Strategy Report looks at all the evidence and explains how we have made decisions: www.eastherts.gov.uk/strategyreport
- An Infrastructure Topic Paper explains how we have planned for new roads and schools for example, and all the work we will still have to do on this before we make a final Plan: www.eastherts.gov.uk/infrastructure
- The Sustainability Appraisal of the draft District Plan compares different options we have thought about: www.eastherts.gov.uk/sa

- 3.2** All this information runs to thousands of pages, but we need to do this amount of work to make sure we have got the Plan right. We are asking people to tell us what they think of all these documents as part of the consultation.

4 How else is the Plan used?

- 4.1** Most of the time people use the Plan when choosing what new buildings or homes should look like or how new homes and roads are laid out. People make a planning application where they ask the Council for permission to build a new room on their house or a new house or lots of new houses. The Council checks these plans and decides if they match the District Plan. This is called the Development Management process.
- 4.2** The Plan provides guidance but there are lots of things to think about that the Plan doesn't cover. Often more detailed work is needed such as checking whether there are bats that live nearby (ecological surveys) or whether a new factory makes the air dirty (environmental health issues) for example.

5 Who has made the decisions on the draft Plan so far?

- 5.1** East Herts Council is the Local Planning Authority and one of its main roles is to produce a District Plan.
- 5.2** There are lots of people within the Council who make decisions but the Council as a whole has agreed what is in the Plan. Every time there is a meeting to discuss and decide things about the Plan, these meetings are filmed and put on the Council's website so everyone can see what things have been talked about. A written record is also kept and can be seen on the website.

6 How can I get involved in the Plan?

- 6.1** We have produced a draft Plan for consultation. This Plan sets out our preferred option for new development. It contains our ideas as to what we think the final Plan should look like.
- 6.2** However, because the Plan could affect everyone who lives in East Herts, we think it is important that everyone in East Herts gets a chance to tell us whether they think we have got these ideas right or not.
- 6.3** So we are giving people the opportunity to write to us with their ideas and they have twelve weeks to do so.
- 6.4** You will be able to see printed copies of the draft Plan at your local library, at East Herts Council offices in Hertford and Bishop's Stortford, at your local Town Council office or leisure centre. The Plan is very long but there are summary documents available that you can take home which are much easier to read. We are also sending summary brochures to every home.
- 6.5** There are several ways to contact us; you can write to us, send us an email or use an online portal. All the contact details are at the end of this booklet.

7 What happens next?

- 7.1** We expect to get lots of comments on the draft Plan and it will take a while to go through them all and work out what changes we will need to make to the Plan.
- 7.2** Once we have done that, we will make a final Plan which we will then send to a Planning Inspector. It is their job to decide whether we have got the final Plan right or not, whether we have used the right evidence and met all legal requirements.
- 7.3** The Inspector will hold a long meeting, which is called an Examination and may take several weeks, where they will discuss the Plan with lots of people who are interested before making a final decision. They may suggest we make changes to the Plan before the Council can adopt the Plan and be able to use it to guide development and make decisions on planning applications.

- 7.4** After this we will have to do more work to make new plans for future development and check that the District Plan is working well.

8 Contact Us

- 8.1** The Council is required by law to consult for 6 weeks. However, East Herts Council will be consulting on the draft Plan for 12 weeks in spring 2014. The Council's agreed procedure for handling consultations is set out in the Statement of Community Involvement (SCI).
- 8.2** The Draft District Plan can be viewed at all local libraries, leisure centres, Town Council offices and the District Council offices in Hertford and Bishop's Stortford. The Draft Plan and all supporting documents can also be viewed online at www.eastherts.gov.uk/districtplan. Alternatively direct access to the consultation portal is via <http://consult.eastherts.gov.uk> (note: no 'www'). You can also register online to receive updates on the progress of the Plan.
- 8.3** Comments should preferably be made online via the consultation portal. Alternatively, you can email us at planningpolicy@eastherts.gov.uk or write to the Planning Policy Team at East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ.
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- 8.5** All comments should be received by 5pm on Thursday 22nd May 2014. The Council cannot guarantee that comments made after this time will be considered.
- 8.6** If you have any further questions on the Draft District Plan, please contact the Planning Policy Team on 01279 655261 or email at planningpolicy@eastherts.gov.uk.

How has the Draft District Plan been prepared?

The Draft District Plan has been prepared using a 'stepped approach'; a process that breaks down the plan-making process into distinct stages. Each stage has been undertaken at public meetings of the Council and all the relevant papers and webcasts of the meetings are available on the Council's website (see link below).

Evidence

There are five main sources of evidence supporting the Draft District Plan:

- **The Supporting Document** explains the process of identifying and shortlisting development options;
- **An Interim Development Strategy Report** demonstrates how the plan meets national policy requirements;
- **A Sustainability Appraisal Report** appraises alternative options;
- **An Infrastructure Topic Paper** sets out the evolving programme of infrastructure planning work;
- **Other technical studies**, including demographic projections.

All these documents, plus all other supporting technical studies and Frequently Asked Questions can be viewed on the Council's website at: www.eastherts.gov.uk/districtplan.

Next Steps

The Council wants to know what you think about the proposals in the Draft District Plan. Following this consultation the Council will consider the responses received and will prepare a final version of the Plan, incorporating changes. There will be further opportunity to comment during a final round of consultation, to ensure it has been prepared correctly and is 'sound'. The Plan will then be submitted for independent examination by a Planning Inspector appointed by the Government.

The Inspector will then publish a report and recommendations and following this the Plan will be adopted by the Council.



CLICK
www.eastherts.gov.uk



PHONE
01279 655261



WRITE
East Herts Council, Wallfields,
Pegs Lane, Hertford SG13 8EQ



EMAIL
planningpolicy@eastherts.gov.uk



East Herts Draft District Plan Preferred Options Consultation 2011 - 2031

What do you think?



February 27 2014 - May 22 2014



What is the District Plan?

The East Herts District Plan sets out the Council's approach to development to 2031, including 15,000 new homes, 9,700 jobs, and a range of supporting infrastructure.



Population projections show that there will be a need for 15,000 new homes to 2031.

Local Planning Authorities are required to produce a Local (or District) Plan.

What do you think?

The Council has prepared a Draft District Plan for consultation and **wants your views** before proceeding to the next stage. The consultation runs for twelve weeks between February 27 to May 22 2014.

Why do we need a plan?

Having a plan in place:

- ✓ Provides a framework for local community needs in terms of jobs, housing (including affordable housing) and infrastructure (e.g. roads, schools, drainage, green space etc);
- ✓ Provides a strong basis for negotiations with developers to secure benefits from new development;
- ✓ Provides greater certainty for communities and businesses over where development will go – they can plan ahead with confidence;
- ✓ Allows infrastructure providers to plan more effectively – helping them to assess and deliver necessary capacity enhancements;
- ✓ Provides the relevant bodies with a firm basis on which to apply for infrastructure funding;
- ✓ Provides the private sector with greater confidence to invest in East Herts.

Not having a plan in place means:

- ✗ Potential for loss of local control making it more difficult to defend the District against inappropriate development (risk that if planning permission is refused developers may be more successful at appeal);
- ✗ New development may not be supported by adequate infrastructure;
- ✗ The cost of defending and losing appeals using an out-of-date plan can be a considerable cost to the tax payer;
- ✗ Opportunities to attract new businesses, investment and infrastructure funding are diminished without a plan.

How will the District Plan affect me?

The Draft District Plan and the Policies Map will show whether future development could be planned to take place near you. The policies also provide the criteria against which any planning applications submitted to the Council would be judged.

In addition to explaining what development is planned, the District Plan and its supporting documents also detail how the Council has come to formulate the strategy presented in this draft Plan.

Understanding issues underpinning the Plan provides a better appreciation of how difficult decisions have been made and why development has been planned in the locations proposed (see also 'How has the District Plan been prepared?' overleaf).



How do I respond to the Consultation?

The District Plan can be viewed at all local libraries, Town Council offices and the District Council offices in Hertford and Bishop's Stortford. The Plan and all supporting documents can also be viewed online at: www.eastherts.gov.uk/districtplan.

You can also register online to receive updates on the progress of the Plan.

Comments should preferably be made online. Alternatively you can email us at planningpolicy@eastherts.gov.uk or write to the Planning Policy Team at East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ.

All comments should be received by 5pm on Thursday 22 May 2014.

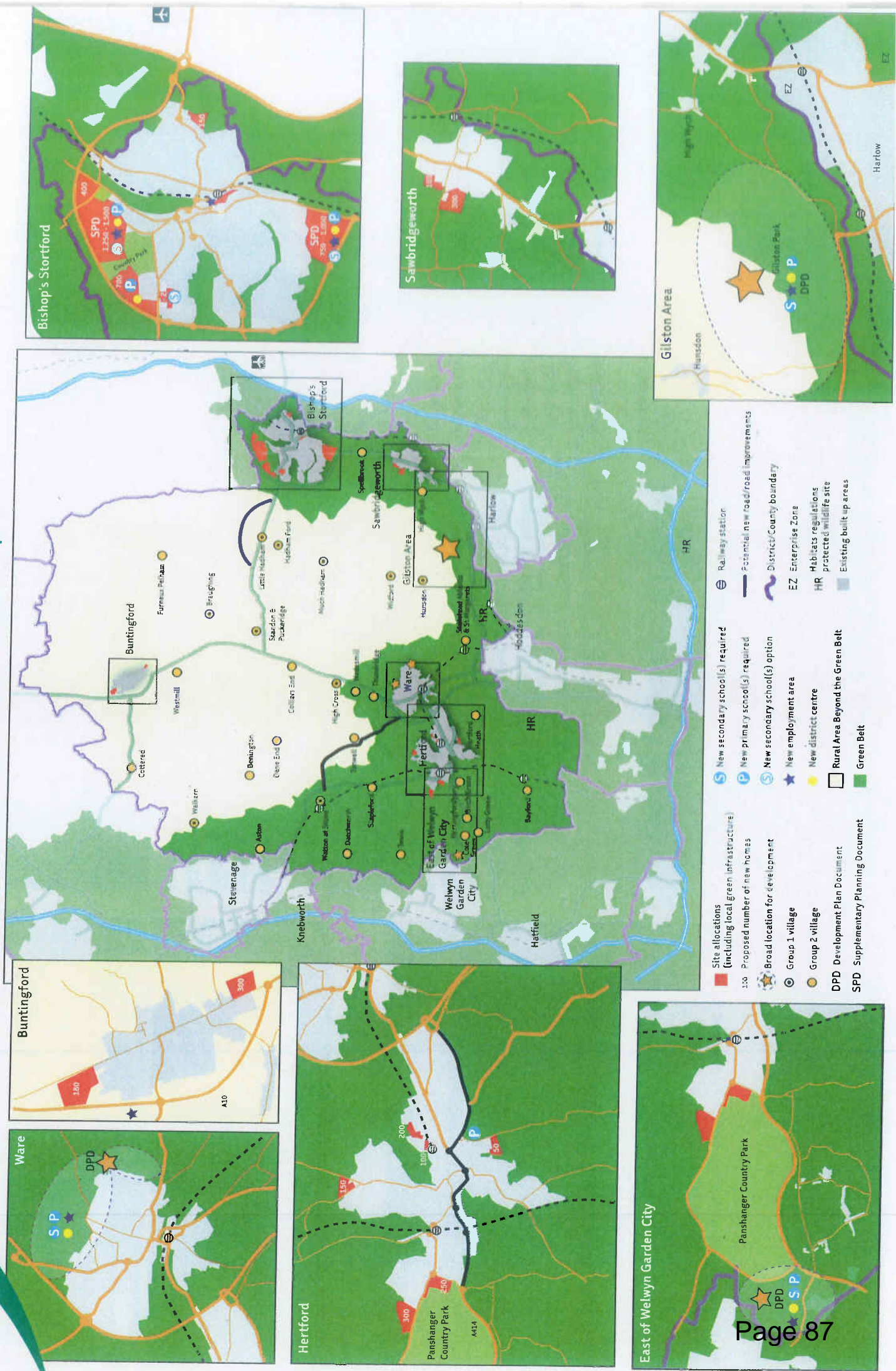
If you have questions on the Draft District Plan, please contact the Planning Policy Team on 01279 655261 or email at planningpolicy@eastherts.gov.uk.



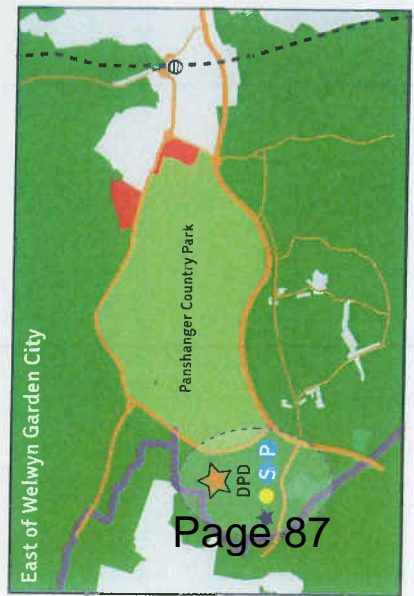
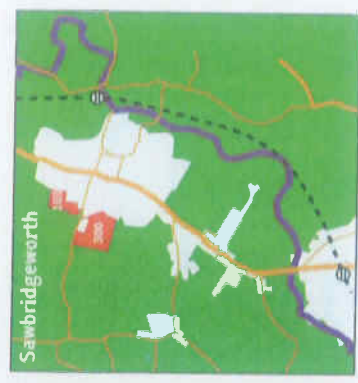
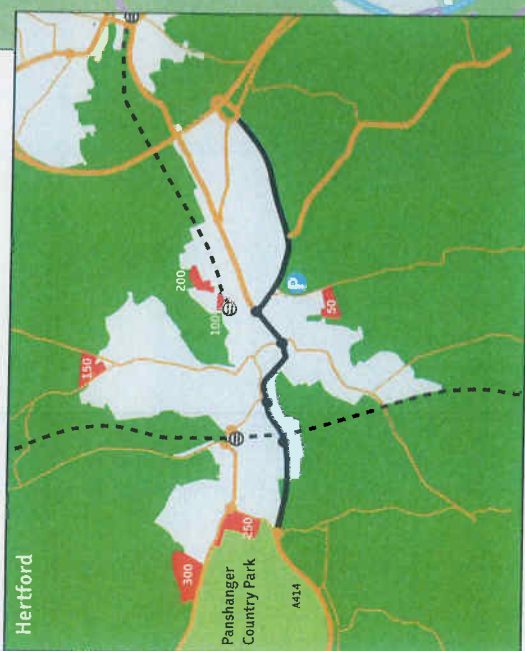
Draft District Plan Key Diagram (Preferred Options)

www.eastherts.gov.uk/districtplan

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Ordnance Survey, LA Ref: 100018528



- Site allocations (including local green infrastructure)
- 1:0 Proposed number of new homes
- ⊙ Broad location for development
- ⊙ Group 1 village
- ⊙ Group 2 village
- DPD Development Plan Document
- SPD Supplementary Planning Document
- S New secondary school(s) required
- P New primary school(s) required
- S New secondary school(s) option
- ★ New employment area
- New district centre
- Rural Area Beyond the Green Belt
- Green Belt
- ⊙ Railway station
- Potential new road/road improvements
- District/County boundary
- EZ Enterprise Zone
- HR Habitats regulations protected wildlife site
- Existing built up areas



What's in the Draft District Plan?

The Draft District Plan consists of two parts; a development strategy and supporting topic-based policies.

88000ft Development Strategy (Part 1)

The Development Strategy sets out how the Plan will deliver 15,000 homes and supporting infrastructure across the District.

Green Belt

Large parts of the District are designated as Green Belt. However, in order to meet national policy requirements and meet projected housing needs, the development strategy involves the release of carefully selected Green Belt, in locations adjacent to the towns with good access to services and facilities.

Bishop's Stortford

- 200 homes at the Goods Yard;
- 150 homes east of Manor Links;
- Depending upon the location of a new secondary school,
- Either 2,350 or 2,600 homes at a mixed-use development at Bishop's Stortford North supported by new schools, neighbourhood centres, employment areas and a country Park;
- Or 0 or 250 homes at Hadham Road; and
- Or 750 or 1,000 homes at a mixed-use development to the south of Bishop's Stortford.

Buntingford

- 300 homes at a mixed-use development to the south of the town;
- 180 homes at a mixed-use development to the north of the town;
- 3 hectares of new employment land at Buntingford Business Park and improved education facilities.

Hertford

- 300 homes at a mixed-use development at Mead Lane;
- 550 homes to the west of the town including a Country Park;
- 150 homes to the north of Hertford, west of Wadesmill Road; and
- 50 homes to the south of Hertford, west of Miangrove Road.

Sawbridgeworth

- 100 homes to the west of the town, north of West Road; and
- 300 homes to the south of West Road.

Ware

- 14 homes at a mixed-use development at the former Co-op depot, Star Street;
- Broad location for development north and east of the town.

Villages

At least a 10% growth to Braughing, High Cross, Hunsdon, Little Hadham and Hadham Ford, Much Hadham, Standon and Puckeridge, Walkern, Watton-at-Stone and Widford, to be delivered through Neighbourhood Planning. Limited infilling only will be appropriate for other rural settlements.

Future Development Options

- Development is also considered at the following locations:
- Approximately 1,700 homes at a mixed-use development East of Welwyn Garden City
- Between 200 and 3,000 homes to the North and East of Ware;
- Between 5,000 and 10,000 homes in the Gilston Area.

Key Infrastructure

In order to support both new and existing communities, it is vital that new development only occurs in tandem with supporting infrastructure. As such, the following key infrastructure improvements are planned:

- Road improvements;
- Little Hadham Bypass;
- Extensions to schools.

Topic-Based Policies (Part 2)

Housing – ensuring the right types of accommodation are provided when needed.

Economy – providing new and retaining existing employment opportunities.

Retail and Town Centres – supporting and protecting local shops and town centres.

Design – ensuring all proposals make a positive contribution to the built environment.

Transport – minimising the need to travel and encouraging journeys by sustainable modes of transport.

Community Facilities, Sport and Recreation – ensuring access to essential community and leisure facilities.

Natural Environment – protecting and enhancing biodiversity for wildlife and recreation.

Landscape – conserving and enhancing valued landscapes.

Heritage – protecting and enhancing historic assets while managing the impacts of change.

Climate Change – minimising the impacts of development on the natural environment and mitigating the impacts of a changing climate.

Water – protecting valuable water resources and managing the risks of flooding.

Environmental Quality – minimising potential environmental impacts of development.



Consultation

East Herts Draft District Plan Preferred Options

What do you think?

Where can I see the Draft District Plan?

Local libraries, leisure centres, Town Council offices and District Council offices in Hertford and Bishop's Stortford.

The Draft District Plan and all supporting documents, including Frequently Asked Questions, can also be viewed online at: www.eastherts.gov.uk/districtplan

Consultation February 27 2014 to May 22 2014



How do I respond to the Consultation?

Comments should preferably be made online at www.eastherts.gov.uk/districtplan, where you can register for updates on the progress of the Plan. Or you can email us at planningpolicy@eastherts.gov.uk or write to the Planning Policy Team at East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ.

All comments should be received by 5pm on Thursday May 22 2014.

Any questions call the Planning Policy Team on 01279 655261 or email at planningpolicy@eastherts.gov.uk.



www.eastherts.gov.uk/districtplan

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Statement of Availability of Draft District Plan Consultation Documents February 27 to May 22 2014

The Draft District Plan and supporting documents are available for public inspection during the normal office hours at the East Herts Council Offices in Hertford and Bishop's Stortford. They are also available for public inspection at the offices of the Town Councils and the libraries and leisure centres in the District. The Documents include:

- *Draft District Plan Preferred Options Consultation 2014*
- *Interim Sustainability Appraisal*
- *Interim Development Strategy Report*
- *Infrastructure Topic Paper*

The following forms, guidance notes and summary documents will also be made available at the locations shown:

- *Comment Form*
- *Consultation Portal Guidance Notes*
- *Frequently Asked Questions*
- *Summary Document*
- *Summary Leaflet*

All documents are also published on the East Herts Council website at www.eastherts.gov.uk/districtplan

Comments on the Draft District Plan Preferred Options Consultation document should be made via the online consultation portal accessed via the address above. Alternatively, you can email your comments to planningpolicy@eastherts.gov.uk or write to the Planning Policy Team, preferably using the Comment Form, to the Hertford address below:

East Herts Council Offices,
Wallfields,
Pegs Lane,
Hertford,
SG13 8EQ

East Herts Council Offices,
The Causeway,
Bishop's Stortford,
CM23 2EN

P.T.O

The Draft District Plan Documents will be available to view during the normal office hours at the libraries and offices of the Town Councils and Leisure Centres. See the Council's website for more details on opening times.

Bishop's Stortford Town Council,
The Old Monastery, Windhill,
Bishop's
Stortford

Bishop's Stortford Public Library,
6 The Causeway, Bishop's Stortford

Grange Paddocks Leisure Centre,
Rye Street, Bishop's Stortford

Buntingford Town Council,
The Manor House, 21 High Street,
Buntingford

Buntingford Public Library,
77 High Street, Buntingford

Ward Freman Pool,
Bowling Green Lane, Buntingford

Hertford Town Council,
The Castle, Hertford

Hertford Public Library,
Old Cross, Hertford

Hartham Leisure Centre,
Hartham Common, Hertford

Sawbridgeworth Town Council,
The Square, Sawbridgeworth

Sawbridgeworth Public Library,
The Forebury, Sawbridgeworth

Leventhorpe Pool and Gym,
Cambridge Road, Sawbridgeworth

Ware Town Council,
The Priory, Ware

Ware Public Library,
87 High Street, Ware

Fanshawe Pool and Gym,
Park Road, Ware

Knebworth Public Library,
7 St Martins Road, Knebworth



East Herts Draft District Plan Preferred Options Consultation

Summary Document

What do you think?

Consultation February 27 2014 to May 22 2014

January 2014



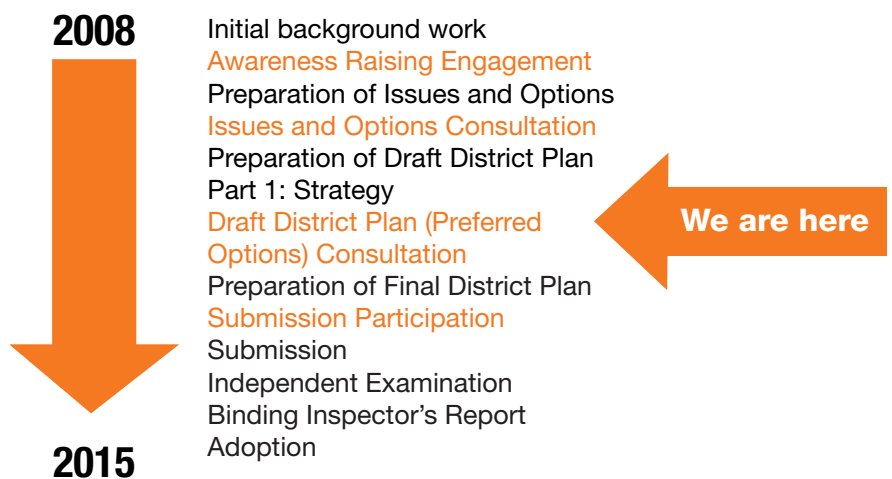
What do you think?

The Council has prepared a Draft District Plan for consultation and wants your views before proceeding to the next stage. The consultation runs for twelve weeks between 27 February to 22 May 2014

What is the District Plan?

The East Herts Draft District Plan is the overarching strategy guiding development up to 2031. It establishes a number of objectives for the District and sets out the policies and development strategy that will achieve these objectives.

Local Planning Authorities are required to establish the level of housing need through demographic projections. These show that there will be a need for approximately 15,000 dwellings over 20 years. In addition to housing it is important that the Council plans for the right types of jobs in the right locations and also ensures the necessary community infrastructure is provided alongside development. This strategy therefore plans approximately 9,700 jobs, new schools and new roads to support new and existing communities.



The District Plan contains two parts. The first part contains the development strategy for the District and settlement-specific policies guiding development in each town, the villages and broad locations of growth. The second part contains detailed topic-based policies to guide development and achieve the development strategy and the overall objectives of the District Plan.

This summary document contains a brief overview of the contents of the Draft District Plan (Preferred Options). It is not intended to replace the depth of material available in the consultation Draft District Plan nor the background evidence.

Why Plan?

Having a plan in place:

- ✓ Provides a framework for local community needs in terms of jobs, housing (including affordable housing) and infrastructure (e.g. roads, schools, drainage, green space etc);
- ✓ Provides a strong basis for negotiations with developers to secure benefits from new development;
- ✓ Provides greater certainty for communities and businesses over where development will go – they can plan ahead with confidence;
- ✓ Allows infrastructure providers to plan more effectively – helping them to assess and deliver necessary capacity enhancements;
- ✓ Provides the relevant bodies with a firm basis on which to apply for infrastructure funding;
- ✓ Provides the private sector with greater confidence to invest in East Herts.

Not having a plan in place:

- ✗ Loss of local control, making it more difficult to defend the District against inappropriate development (risk that if planning permission is refused developers may be more successful at appeal);
- ✗ New development may not be supported by adequate infrastructure;
- ✗ The cost of defending and losing appeals using an out-of-date plan can be a considerable cost to the tax payer;
- ✗ Opportunities to attract new businesses, investment and infrastructure funding are diminished without a plan.

Where is the evidence behind the Draft Plan?

There are five main sources of evidence:

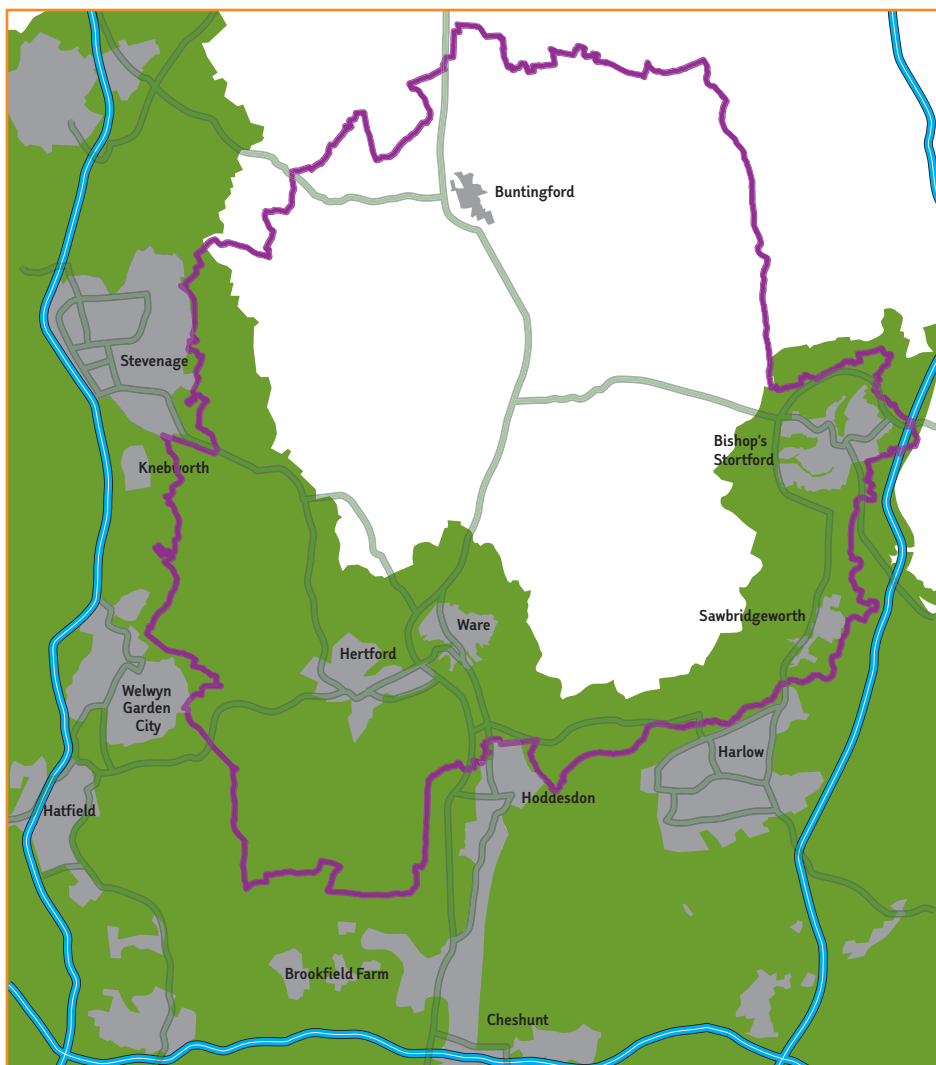
- The Supporting Document explains the process of identifying and shortlisting development options;
- An Interim Development Strategy Report demonstrates how the Plan meets national policy requirements;
- The Infrastructure Topic Paper sets out the evolving programme of infrastructure planning work;
- The Sustainability Appraisal appraises alternative option; and
- Other technical evidence including population projections.

All these documents, plus all other supporting technical studies and Frequently Asked Questions, are available on the Council's website at: www.eastherts.gov.uk/districtplan

Main Challenges

There are many challenges facing East Herts: High levels of housing need;

- Cross-boundary growth and infrastructure issues;
- The cumulative impacts of development;
- Traffic congestion and difficulties with east-west access;
- Developer challenges to the Green Belt and the rural area;
- A lack of primary and secondary education places in all of the towns;
- Competition in retail and employment terms from major towns outside the district with high levels of out-commuting;
- A need to balance the desire of people wishing to live in the District's historic settlements with the need to protect their special character;
- A lack of affordable housing across the District and a gap in the housing market for those with low to average earnings; and
- A wealth of sites of importance to wildlife which are particularly vulnerable to the effects of development.



The Green Belt

Large parts of the District are designated Green Belt as shown below. However, national policy requires Local Planning Authorities to make every effort to meet projected housing needs – where necessary involving the release of Green Belt. Therefore some carefully selected Green Belt releases are necessary in locations adjacent to the towns with good access to services and facilities. In the longer term, large scale development and new settlements may be needed to ease the pressures on the market towns and villages.

Bishop's Stortford

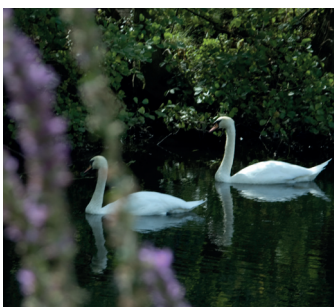
Bishop's Stortford is the largest town in East Herts with a population of approximately 37,500 people (2011 Census). The town has an important role related to its retail, leisure and employment offer, enhanced by good transport links including the M11 and the railway.

Main challenges

- A lack of education capacity, particularly at the secondary level;
- Congestion at key roads and a lack of town centre parking spaces at peak time;
- Development opportunities in the town centre mean that the town has capacity to provide more retail and employment opportunities and reduce the outflow of shopping trips to Harlow and Cambridge;
- Creating a coherent economic development strategy, taking account of the town's strengths including its proximity to the M11 and Stansted Airport.

Development Strategy Headlines

- Population projections show a need for 5,380 homes;
- 4,634 of these can be accommodated within the town;
- 3,950 will be on identified site allocations (as shown on the map below);
- 684 will be at locations in the town which have recently been completed, have planning permission and other small sites;
- The remainder to be directed to the Gilston Area (north of Harlow);
- Town centre sites include the Goods Yard and Old River Lane/Causeway;
- Areas ruled out include the Stort Valley and beyond the A1184/A120 bypass;
- Potential secondary school site options, new neighbourhood/district centres, employment areas and a Country Park are also proposed.



Buntingford is the district's smallest town, with a population of approximately 5,000 people (2011 Census). It is also the only town without a train station. Despite this, Buntingford is a thriving market town with a relatively high provision of local employment land, community facilities and retail, serving a wider hinterland of approximately 14,000 residents.

Main challenges

- Buntingford has a three-tier education system that is near capacity at lower tiers and is full in middle and upper tiers.
- The town's distance from larger towns and lack of rail line means there is a relative lack of public transport and a dependence on private vehicles to access services.
- The valley landscape places part of the town at risk of flooding.
- The town's limited retail offer leads to a general outflow of shoppers.
- Whilst there is a high level of out-commuting, Buntingford also attracts workers from a wide area into its small but successful employment areas.

Development Strategy Headlines

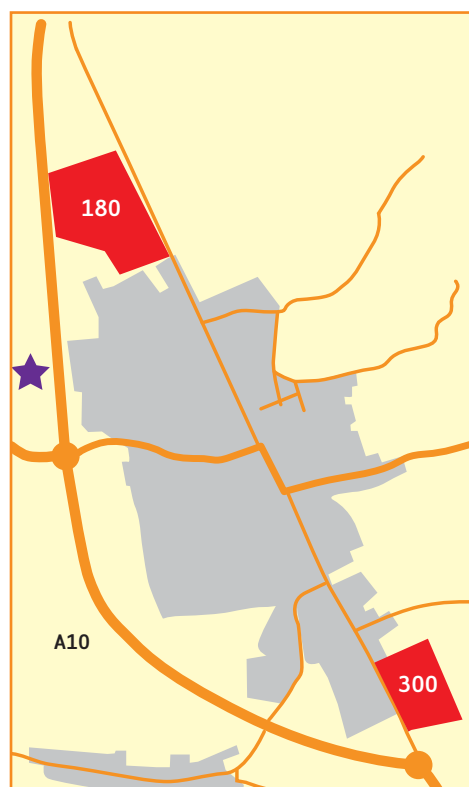
Buntingford will receive at least 500 new homes in the period to 2031. Development will be located in the following locations:

- Approximately 300 dwellings to the south on the former Sainsbury's depot site
- 180 dwellings to the north plus an extension to Freman College;
- Other identified SLAA sites, commitments and a proportion of windfall development;
- An additional 3 hectares to the north of Buntingford Business Park for employment purposes.



Key

- Site allocations (including local green infrastructure)
- 100 Proposed number of new homes
- ★ New employment area
- Rural Area Beyond the Green Belt
- Existing built up areas



Hertford

Hertford is the second largest town in East Herts, with a population of approximately 25,000 people (2011 Census). As the county town of Hertfordshire, there is a strong presence of local government, businesses and independent retailers set within and around an historic town centre.

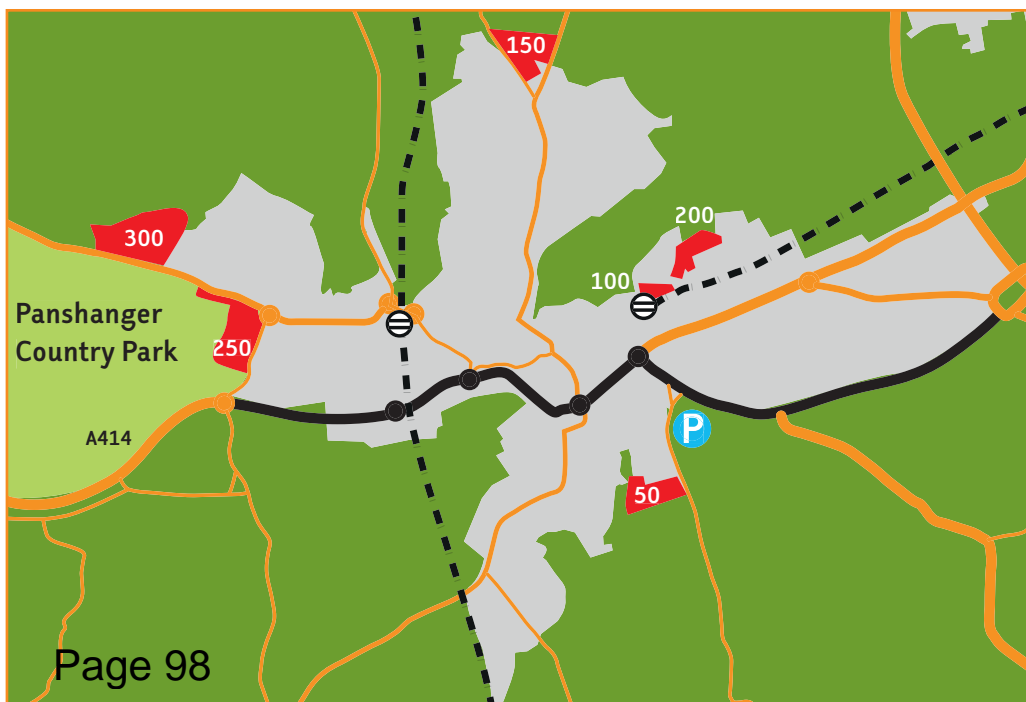
Hertford's urban form is largely influenced by the waterways that run through the town. 'Green fingers', which penetrate the urban core, contribute to the character and attractiveness of the town as well as providing valuable wildlife habitats and opportunities for recreation.

Main challenges

- There are capacity issues within Hertford's schools at both primary and secondary level.
- The town benefits from, but is also constrained by, its historic character, the A414, and by the presence of locally and nationally important wildlife assets.
- The town suffers from peak time congestion.
- Affordability of housing is a key issue which is exacerbated by high demand.

Development Strategy Headlines

- Population projections show a need for 3,242 homes;
- 1,948 of these can be accommodated within the town;
- 1,050 will be on identified site allocations (as shown on the map below);
- 898 will be at locations in the town which have recently been completed, have planning permission and other small sites;
- The remainder to be directed East of Welwyn Garden City;
- Areas ruled out include the historic parks and river valleys;
- A new primary school site and a Country Park are also proposed.



Key

- Site allocations (including local green infrastructure)
- 100 Proposed number of new homes
- P New primary school required
- ⊖ Railway station
- Potential road improvements
- Existing built up areas
- Green Belt



Sawbridgeworth

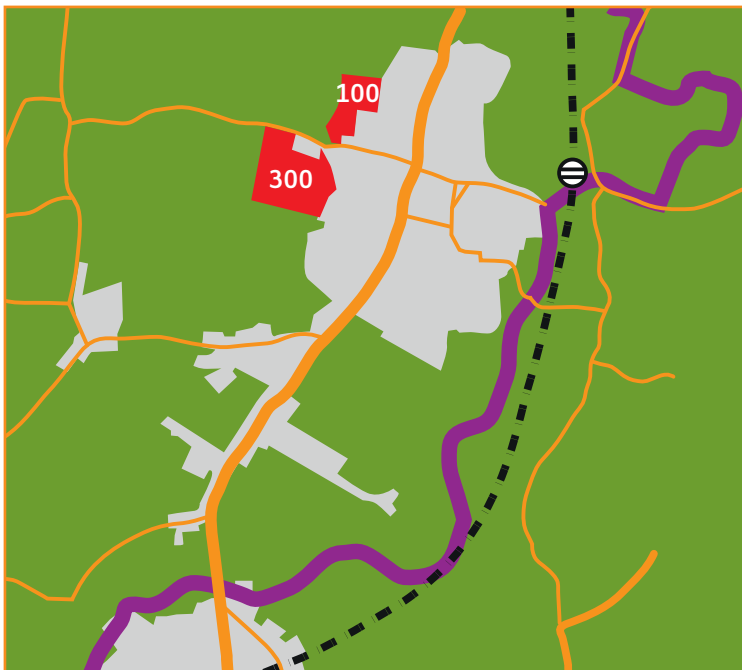
Sawbridgeworth is the District's second smallest town with a population of approximately 10,000 people (2011 Census). The location of the town between the larger settlements of Bishop's Stortford and Harlow, and its good rail connection, contributes to how the town functions; predominantly as a dormitory town, providing limited employment and retail opportunities, resulting in significant outflows of residents.

Main challenges






- Peak time congestion on the A1184 London Road with conflicts between vehicles and pedestrians in the historic town centre;
- The historic character of the town is both an advantage and disadvantage in terms of attracting new businesses;
- Proximity to larger centres results in out-commuting for employment and retail purposes;
- The town supports a wide rural area and as such suffers from a lack of capacity in its schools;
- Sawbridgeworth is physically constrained by features such as the valley landscape and River Stort floodplain but benefits from sites of national wildlife importance.

Development Strategy Headlines

- Population projections show a need for 456 homes;
- 562 homes can be accommodated within the town;
- 400 of which will be at identified site allocations (as shown on the map below);
- 162 will be at locations in the town which have recently been completed, have planning permission and other small sites.



Key

- | | |
|--|--|
|  Site allocations (including local green infrastructure) |  Green Belt |
| 100 Proposed number of new homes |  Railway station |
|  Existing built up areas |  District/County boundary |



The Development Strategy

- At least 15,000 new homes across the whole district to 2031;
- 9,700 new jobs;
- 10% growth to villages: Braughing, High Cross, Hunsdon, Little Hadham & Hadham Ford, Much Hadham, Standon & Puckeridge, Walkern, Watton-at-Stone and Widford;
- Site allocations for short and medium-term planning; and
- Broad locations identified for further assessment for long-term planning.

List of Topic Policies with their aims

Housing – ensuring the right types of accommodation are provided when needed.

Economy – providing new employment opportunities and protecting existing employment land.

Retail and Town Centres – supporting the role of town centres and protecting vital local centres.

Design – ensuring all proposals make a positive contribution to the built environment.

Transport – minimising the need to travel and encouraging journeys by sustainable modes of transport.

Community Facilities, Sport and Recreation – ensuring that residents benefit from improved access to community and leisure facilities.

Natural Environment – protecting and enhancing biodiversity assets and creating new green spaces for wildlife and recreation.

Landscapes – conserving and enhancing valued landscapes for their intrinsic beauty and their role in providing a setting for our towns and villages.

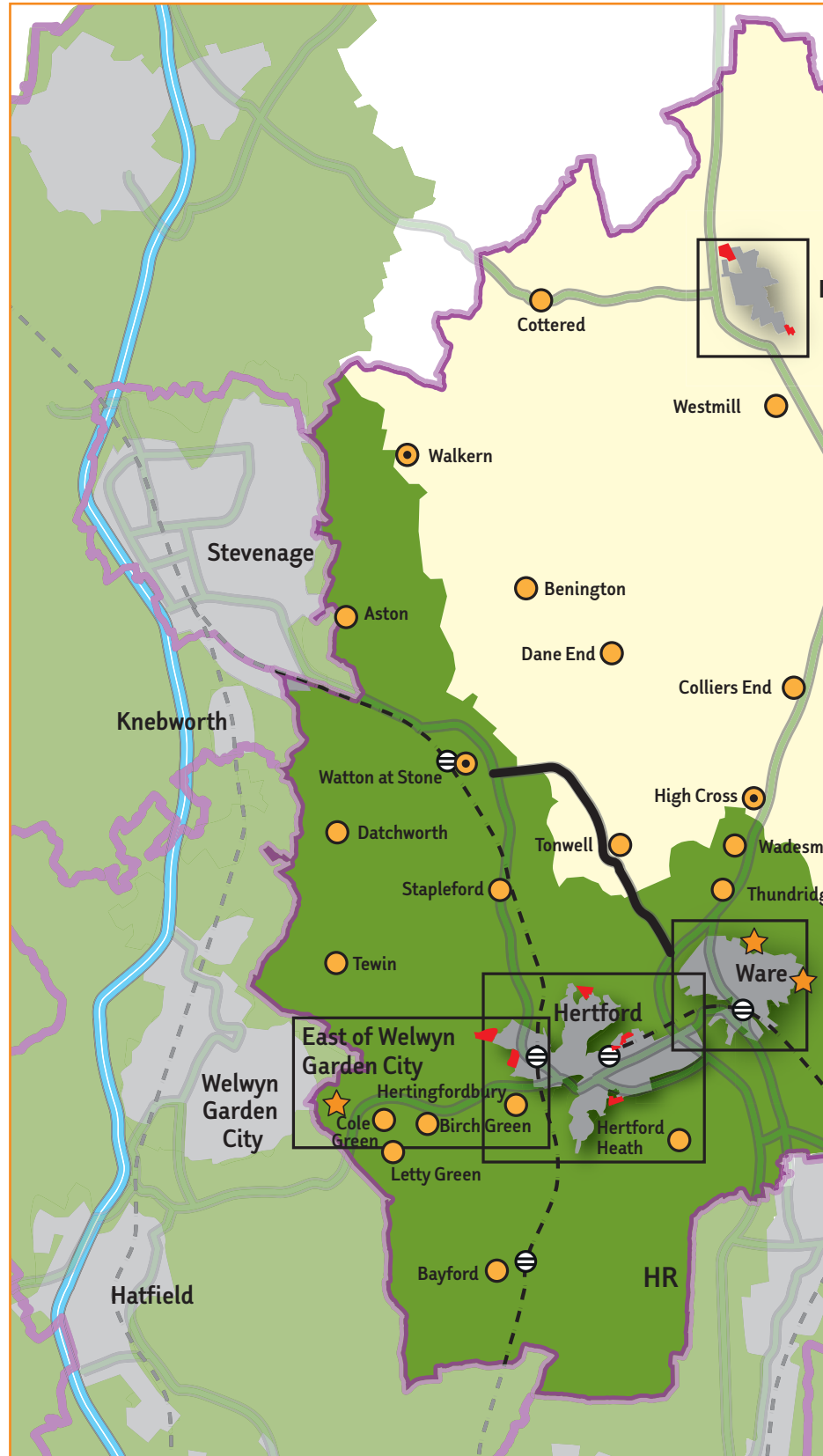
Heritage – protecting and enhancing the historic character of East Herts while managing the impacts of change.

Climate Change – minimising the impacts of development on the natural environment and mitigating impacts caused by a changing climate.

Water – protecting valuable water resources and managing the risks of flooding.

Environmental Quality – minimising potential environmental impacts of development.

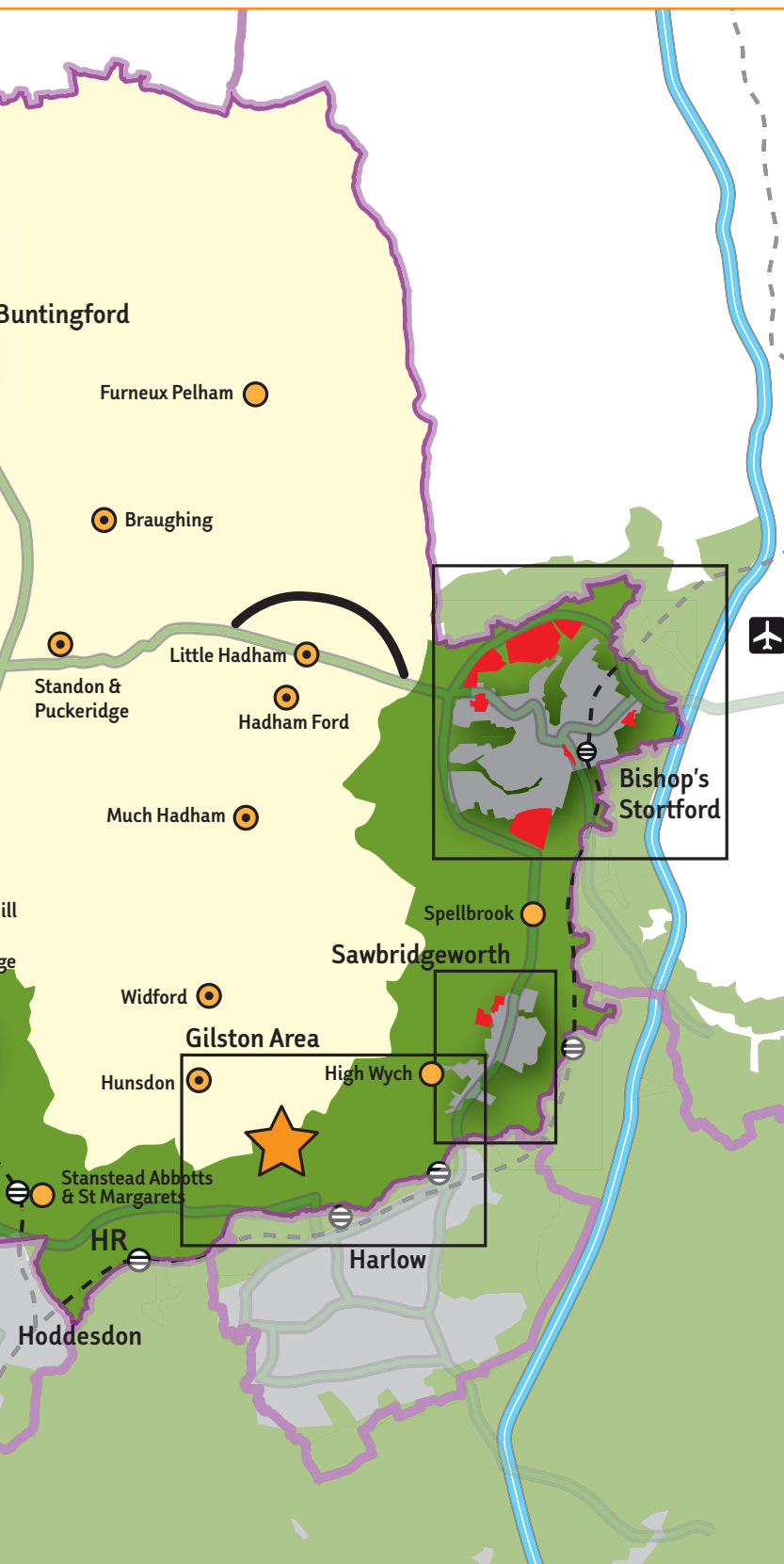
Delivery – setting out how the objectives of the Plan will be delivered and monitored.



Key

- Site allocations (including local green infrastructure)
- 100 Proposed number of new homes
- ★ Broad location for development
- Group 1 village
- Group 2 village

- DPD Development Plan Document
- SPD Supplementary Planning Document
- S New secondary school(s) required
- P New primary school(s) required
- S New secondary school(s) option



Guiding principles

The guiding principles informing the Development Strategy are as follows:

1. To seek to meet the housing requirement within each housing market area, even where local constraints mean that each settlement may not be able to meet its own needs;
2. To prioritise the development of brownfield land and other appropriate sites within the urban areas of the settlements, but to avoid over-development of such sites;
3. To promote self-containment by directing development to areas where there is reasonable proximity to services and facilities, and which reflect existing travel to work areas, school catchments, and retail spend patterns;
4. Wherever possible to utilise readily available features to provide clear and unambiguous Green Belt boundaries;
5. To allocate development sites unless there are clear planning reasons for not doing so, in order to provide clarity and certainty for local people, businesses and the development industry;
6. To co-operate with adjoining authorities on cross-boundary strategic matters where it is reasonable to do so;
7. To focus development in locations where the impacts on the historic and natural environment are minimised;
8. To acknowledge that in the long term, the capacity for the market towns and villages to grow is constrained by the existing capacity and future potential of these settlements, and therefore long-term planning will need to look towards large-scale strategic development options;
9. To protect and enhance the rural area and the Green Belt outside the allocated development areas to preserve the countryside and the rural character of the District;
10. To encourage limited small-scale development in and around the identified villages, with an opportunity for neighbourhood planning to influence the type and location of development sites.

Ware

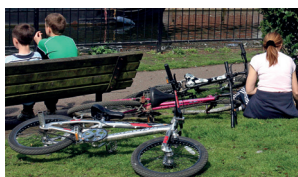
Ware is the District's third largest market town with a population of approximately 18,000 people (2011 Census). The town benefits from a wide range of independent retailers and cultural facilities in its historic core and hosts several sports and leisure facilities on its outskirts. Ware plays a key role as a market town and rural service centre serving both the town itself and rural hinterland. The presence of the River Lea, which historically influenced the town's development pattern, provides wildlife and leisure benefits as well as contributing to the form and character of the town.

Main challenges

- Located along the valley of the River Lea, parts of the town are at considerable risk of flooding;
- The town's historic core is both an advantage and disadvantage in terms of attracting businesses;
- The majority of the town's employment offer is concentrated on one major employer;
- The town centre suffers from peak time congestion, exacerbated by the delivery needs of the town centre shops;
- There is a lack of capacity in the town's education facilities, particularly at secondary level.

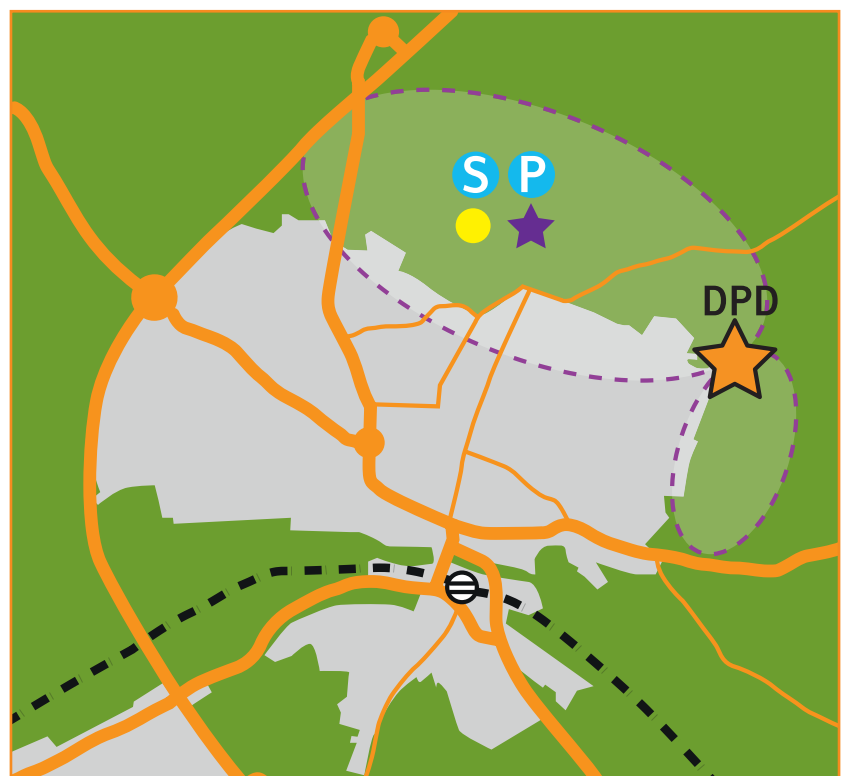
Development Strategy Headlines

- Population projections show a need for 2,261 homes;
- At least 330 can be accommodated within the town;
- 14 of which will be at an identified site allocation;
- 316 will be at locations in the town which have recently been completed, have planning permission and other small sites;
- The remainder will be addressed at the Broad Location to the north and east;
- Areas ruled out include the south-east and south-west, and the Meads.



In addition, land to the North and East of Ware is identified as a Broad Location for Development of between 200 and 3,000 new homes and supporting infrastructure, with the potential to deliver 1,800 homes between 2022 and 2031, (see 'Longer Term Planning' below for more information on Broad Locations).

- A Development Plan Document (DPD) will need to be prepared in collaboration with Ware Town Council, Wareside Parish Council, Hertfordshire County Council, landowners and stakeholders. The development will need to consider among other things:
 - Means of access, sustainable transport and highway mitigation measures (including a new link road);
 - The need for new school/s;
 - Provision of a new sewer and satisfactory water supply;
 - Community facilities, retail and employment opportunities;
 - Sustainable design, green infrastructure, landscaping and environmental mitigation; and
 - Green Belt boundaries.
- The area will remain in the Green Belt until adoption of the DPD, anticipated in 2019-20.



Key

- | | |
|----------------------------------|-------------------------|
| Broad location for development | New district centre |
| DPD Development Plan Document | Railway station |
| New secondary school(s) required | Existing built up areas |
| New primary school(s) required | Green Belt |
| New employment area | |

There are over a hundred villages and hamlets in the District, which are home to a significant proportion of the population. These villages vary in scale and range of facilities, and the development strategy differentiates these by designating villages as either Group 1, Group 2 or Group 3 villages (Group 3 not shown). Group 1 villages are considered more able to accommodate development, benefitting from local shops or schools for example.

The District Plan will give a significant role to Parish Councils for the Group 1 villages, by providing them with the opportunity to prepare Neighbourhood Plans. These will identify suitable development locations and planning guidance which will form an important consideration in relation to future planning applications.

Main challenges

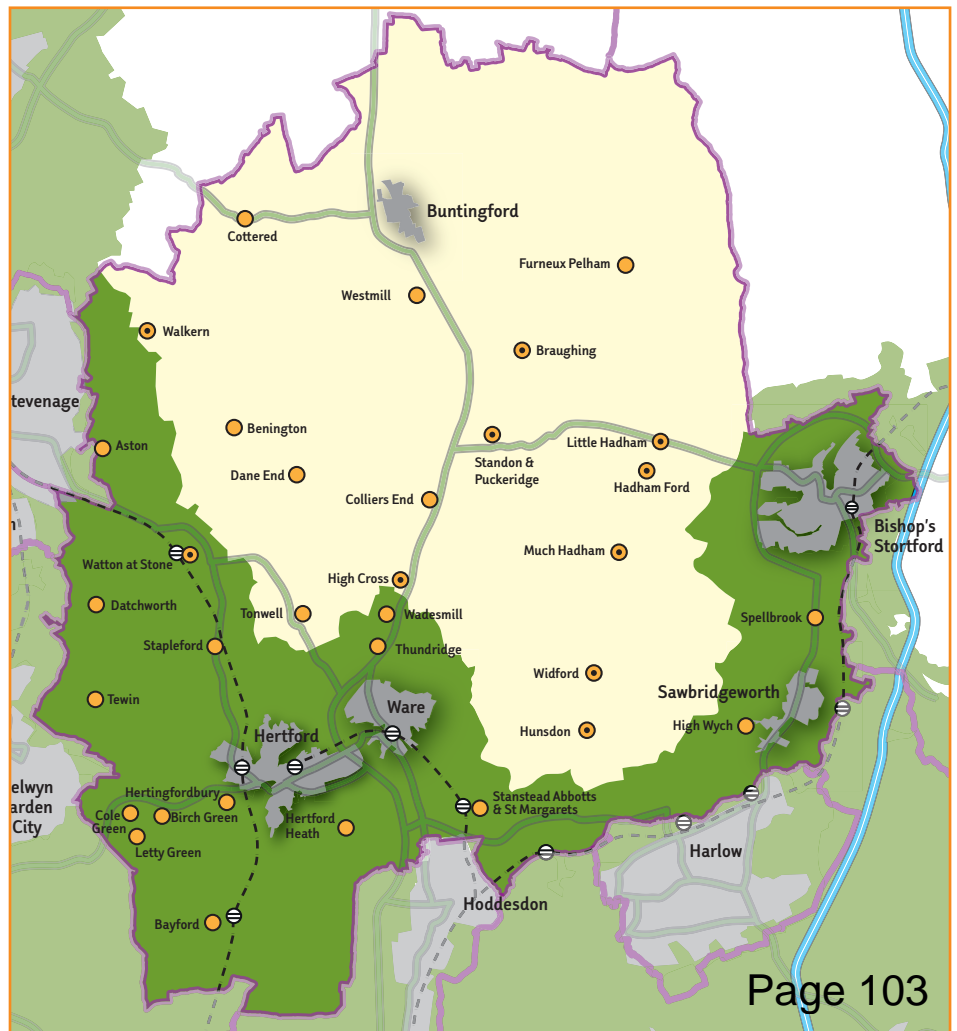
- Rural housing affordability;
- Ageing demographic profile;
- Preservation of the historic character and countryside setting;
- Continued viability of local services and facilities;
- Poor rural transport and significant volume of car-based trips to nearby towns.

Development Strategy Headlines

- Population projections show a need for 3,364 homes;
- 757 of these will be met through locations which have recently been completed or have planning permission;
- 500 will be met in Group 1 villages (see Key Diagram) through 10% growth. These will be delivered through Neighbourhood Planning;
- Limited infill only will be acceptable at Group 2 villages;
- The remainder of unmet rural housing need will be directed to the Gilston Area (north of Harlow).

Key

- Group 1 village
- Group 2 village
- ⊖ Railway station
- ⌞ District/County boundary
- Existing built up areas



Longer Term Planning

In order to ensure longer term development needs are met, three locations have been identified as Broad Locations for development. These locations will need further assessment and detailed planning through a Development Plan Document (DPD), subject to full consultation and examination in public. Due to the need to ensure necessary infrastructure is delivered as part of these proposals, development would not occur until the latter stages and beyond the current Plan process.

All three Broad Locations will remain in the Green Belt until the adoption of the DPD, anticipated in 2019-20. In addition to the land to the North and East of Ware (see above), the following two locations are proposed:

The Gilston Area

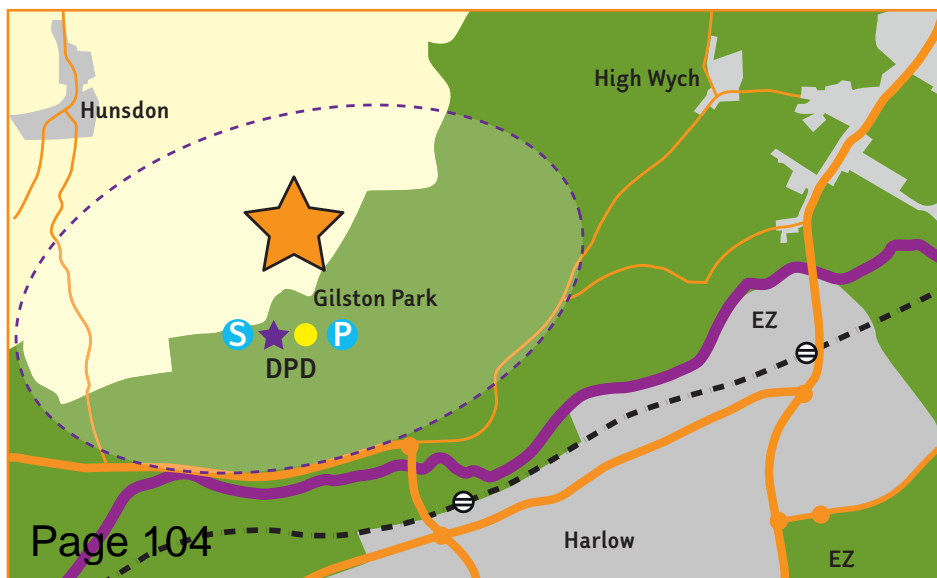
Land in the Gilston Area could accommodate between 5,000 and 10,000 new homes, with the potential to deliver 3,000 homes to meet the housing needs of East Herts between 2022 and 2031, and the remainder after 2031.

The DPD will need to be prepared in collaboration with neighbouring authorities of Harlow and Epping Forest District Councils, Sawbridgeworth Town Council, Hunsdon, Eastwick & Gilston, High Wych and Widford Parish Councils, Essex and Hertfordshire County Councils, landowners and stakeholders.

Development Strategy Headlines

The development will need to consider among other things:

- Local and sub-regional transport infrastructure measures;
- The need for new school/s;
- Sustainability features including district heating and rainwater harvesting;
- The relationship with surrounding settlements, including Eastwick, Gilston, High Wych, and Hunsdon;
- Linkages and connections with Harlow;
- Other infrastructure including a potential new sewage treatment works;
- Green infrastructure network including the Stort Valley and the streams crossing the area; and
- Green Belt boundaries and new Green Belt.



Key

- ★ Broad location for development
- DPD Development Plan Document
- S New secondary school(s) required
- P New primary school(s) required
- ★ New employment area
- New district centre
- Rural Area Beyond the Green Belt
- Existing built up areas
- Green Belt
- ~ District/County boundary
- ⊖ Railway station
- EZ Enterprise Zone

East of Welwyn Garden City

Land to the east of Welwyn Garden City could accommodate around 1,700 new homes to meet the housing needs of East Herts, with the potential to deliver 450 homes between 2029 and 2031 and the remainder after 2031.

The DPD will need to be prepared in collaboration with Welwyn Hatfield Borough Council, Hertingfordbury Parish Council, Hertfordshire County Council, landowners and stakeholders.

Development Strategy Headlines

The development will need to consider among other things:

- Linkages to potential sites in neighbouring Welwyn Hatfield Borough;
- The need for new school/s;
- Transport measures to address congestion on the A414, the A1(M) junction 4 and in Welwyn Garden City;
- A new County Park between the development area and Hertford;
- Green Belt boundaries; and
- Prior mineral extraction.

Key

- Site allocations (including local green infrastructure)
- ★ Broad location for development
- DPD Development Plan Document
- Ⓢ New secondary school(s) required
- Ⓟ New primary school(s) required
- ★ New employment area
- New district centre
- ⊖ Railway station
- ⤿ District/County boundary
- Existing built up areas
- Green Belt



What happens next

Comments and consultation feedback on the Draft District Plan will be used to inform the preparation of the Submission Draft District Plan.

The Council will consider all responses, along with any changes arising to the Plan as a result of the consultation. The Plan will be subsequently made available for a final round of consultation, to ensure it has been prepared correctly, and is 'sound'. In other words, it has been positively prepared, justified, is effective and consistent with national policy.

The Plan will then be submitted for independent examination by a Planning Inspector appointed by the Government. The Inspector will publish a report and recommendations and the Plan will in due course be adopted by the Council.

Whilst the Plan has been prepared using a stepped approach, the potential impacts of the plan will be monitored using the 'plan – monitor – manage approach'. This is a method that establishes a system of monitoring and reporting that then enables changes to be made to the plan in the form of revisions.

How can I view the Draft District Plan?

The Draft District Plan can be viewed at all local libraries, Town Council offices and the District Council offices in Hertford and Bishop's Stortford.

The Draft District Plan and all supporting documents, together with some Frequently Asked Questions, can also be viewed online at: www.eastherts.gov.uk/districtplan

How do I respond to the Consultation?

Comments should preferably be made online using our Consultation Portal by following the links at www.eastherts.gov.uk/districtplan. The Portal also enables you to register to receive updates on the progress of the Plan.

Alternatively you can email us at planningpolicy@eastherts.gov.uk or write to the Planning Policy Team at East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ.

All comments should be received by 5pm on Thursday 22 May 2014. The Council cannot guarantee that responses received after the consultation deadline will be considered.

If you have questions on the Draft District Plan, please contact the Planning Policy Team on 01279 655261 or email at planningpolicy@eastherts.gov.uk.

If you would like a translation of this document in another language, large print, Braille, audio or an electronic format, please contact Communications at East Herts Council on 01279 655 261 or email communications@eastherts.gov.uk



CLICK

www.eastherts.gov.uk



PHONE

01279 655261



WRITE

East Herts Council, Wallfields,
Pegs Lane, Hertford SG13 8EQ



EMAIL

planningpolicy@eastherts.gov.uk



VISIT

- Charringtons House, Bishop's Stortford
- Wallfields, Hertford



COMMENT FORM

Please either use this form or, preferably, use the consultation portal which can be accessed via:

www.eastherts.gov.uk/presubmissiondistrictplan or use the direct link:
<http://consult.eastherts.gov.uk>

**PRE-SUBMISSION DISTRICT PLAN CONSULTATION:
3rd NOVEMBER to 15th DECEMBER, 2016**

East Herts Council has produced its District Plan which sets out the planning framework for the District for the period 2011-2033. There have been two previous iterations (Issues and Options, 2010 and Preferred Options, 2014) that have been subject to Public Consultation and the Council now considers it has a sound plan to submit to the Planning Inspectorate.

The District Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements and whether it is sound. A Local Planning Authority should submit a plan for examination which it considers to be sound namely that it is:

- **Positively Prepared**- the Plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified**- the Plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence;
- **Effective**- the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy**- the Plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Comments submitted in this consultation should have regard for whether the plan is legally compliant, compliant with the Duty to Co-Operate and compliant with the four tests of soundness.

East Herts Council is also seeking to understand if respondents wish to take part in the oral part of the examination of the plan.

PLEASE REMOVE FRONT SHEET WHEN RETURNING FORM



COMMENT FORM



COMMENT FORM

The information you provide will be held on a database and used to assist in the preparation of planning documents. The information will be used in accordance with the data protection act (1998). **The information you supply, including personal details (name) and your comment, will be publically available for any other person to inspect.**

<p>Official Use Only:</p> <p>Reference:</p> <p>Date Rec:</p>

Part A- Personal Details

We regret that we are unable to process any responses supplied without contact details.

Please tick as appropriate:

- Responding as an individual
- Responding on behalf of an organisation
- Agent responding on behalf of client

Please Complete in Block Capitals

First Name

Last Name

Job Title/Dept

Organisation

Address Line 1

Line 2

Line 3

Line 4

Post Code

Tel. No (Daytime)

Mobile

E-mail

Agent Details (if applicable)

First Name

Last Name

Job Title/Dept

Organisation

Address Line 1

Line 2

Line 3

Line 4

Post Code

Tel. No (Daytime)

Mobile

E-mail



COMMENT FORM

Part B- Representation (Please use separate sheet for each comment)

Do you consider the proposed Pre-Submission District Plan to be:

Legally Compliant Yes No

Compliant with the Duty to Co-operate Yes No

Sound Yes No

Do you consider the proposed Pre-Submission District Plan to be:

Positively Prepared Yes No
(Is the plan based on a strategy that seeks to meet objectively assessed development and infrastructure requirements?)

Justified Yes No
(Is the plan the most appropriate strategy, when considered against the reasonable alternatives?)

Effective Yes No
(Is the plan deliverable over its period and is it based on joint working on cross-boundary strategic priorities?)

Consistent with national policy Yes No
(Does the plan enable the delivery of sustainable development?)

Which part of the District Plan does this comment relate to?

Paragraph

Policy



COMMENT FORM

Please make your comments here, taking account of whether you feel the Pre-Submission District Plan is legally compliant, compliant with the duty to co-operate and sound. Additional sheets may be attached to this form.



COMMENT FORM

Please set out the modification(s) you consider necessary to make the Pre-Submission District Plan legally compliant or sound.

COMMENT FORM

Examination

Do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

No, I do not wish to participate at the oral examination

Please note that written and oral comments carry the same weight and will be given equal consideration by the Inspector.

If you consider it necessary to speak at the examination, please outline below why you consider it to be necessary.

Please note that the Inspector will determine the most appropriate process to adopt to hear those who have indicated that they wish to participate at the examination.



COMMENT FORM

Do you wish to be notified of any of the following?

The submission of the East Herts District Plan for independent examination.	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
The publication of the Inspectors Report on the East Herts District Plan.	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the East Herts District Plan.	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please return form to the Planning Policy Team:

By Email:
planningpolicy@eastherts.gov.uk

By Post:
Planning Policy
East Herts Council
Wallfields, Pegs Lane,
Hertford, Hertfordshire
SG13 8EQ

Comments must be submitted no later than 5pm on Thursday 15th December, 2016

(Comments received after this time may not be considered).

Signature:

Date:



Consultation Portal Guidance



Pre-Submission Consultation 2016

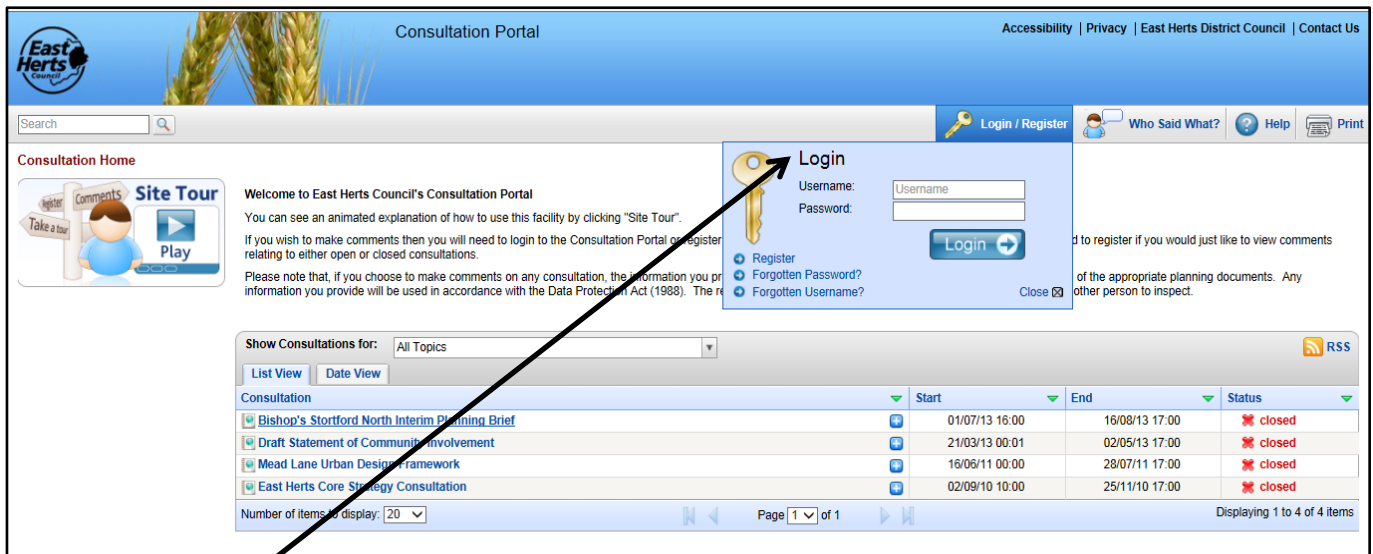
Consultation Portal Guidance

It is easy to submit your comments online using the East Herts Council Consultation Portal.

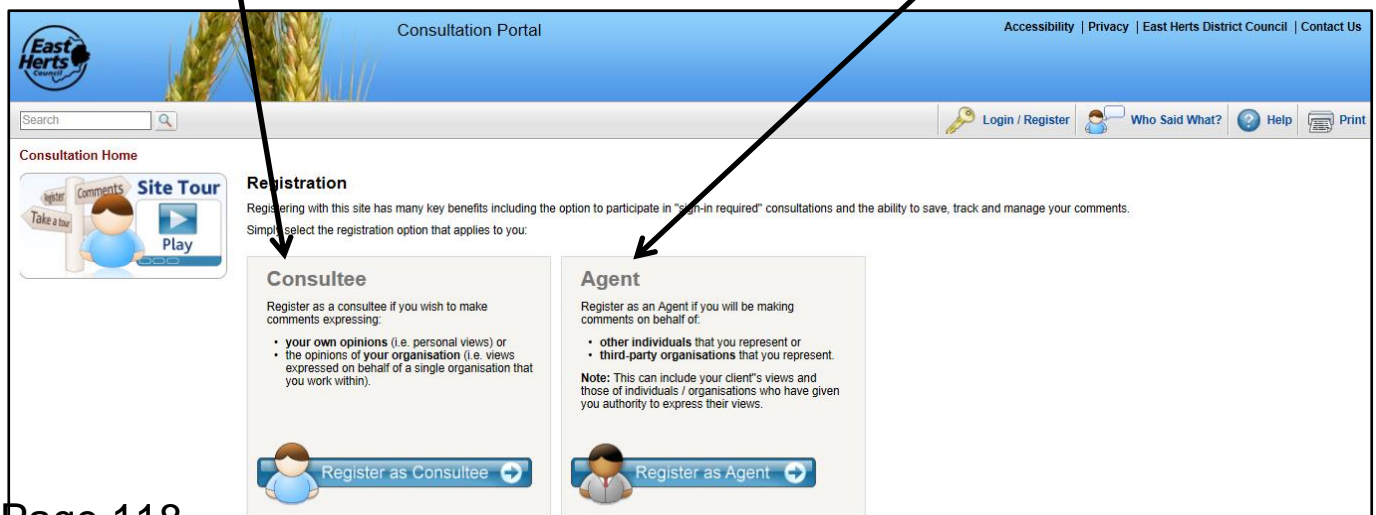
You can either follow the link from the Council's website:

www.eastherts.gov.uk/presubmissiondistrictplan or use the direct link:
<http://consult.eastherts.gov.uk>

Registering and Logging in to the Consultation Portal



- 1) Log in or register on the site to make your comments. If you have already registered go to point 7 below. If you have registered for a previous consultation the same log in details should be used. If you have previously registered but forgotten your details, click 'forgotten password' or 'forgotten username' to retrieve your details. If you are still having issues you can contact the Planning Policy team.
- 2) Choose whether you are responding as an individual/on behalf of an organisation or whether you are representing a client.



3) Complete contact details and click 'ok'

East Herts Council Consultation Portal

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Consultation Home

Register Comments Site Tour
Take a tour Play

Consultee Registration

Please complete the following information and select OK. We will then send you an activation email to confirm your account.

My Account

Name & Email

Title

Given Name

Family Name

Email Address

Username

Password

Confirm Password

I agree to all of the Terms and Conditions of registering Yes No

* denotes required field

4) There may be others already using the Objective Consultation system with a similar name so it may take more than one attempt to create a username.

5) You will receive an email notification. **Important:** You must follow the link from your acknowledgement email to complete your registration.

6) You will be asked to answer a series of questions, such as age range and interests. These are designed to enable officers to undertake statistical analysis only. No data provided is used for any other means.

Viewing and Making Comments

7) Click the title of the Pre-Submission District Plan Consultation, 2016.

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Search

Login / Register Who Said What? Help Print

Consultation Home

Register Comments Site Tour
Take a tour Play

Welcome to East Herts Council's Consultation Portal

You can see an animated explanation of how to use this facility, by clicking "Site Tour".

If you wish to make comments then you will need to login to the Consultation Portal or register your details if this is your first time using this facility. You do not need to register if you would just like to view comments relating to either open or closed consultations.

Please note that, if you choose to make comments on any consultation, the information you provide will be held on a database and used to assist in the preparation of the appropriate planning documents. Any information you provide will be used in accordance with the Data Protection Act (1988). The responses you supply and your name will be publicly available for any other person to inspect.

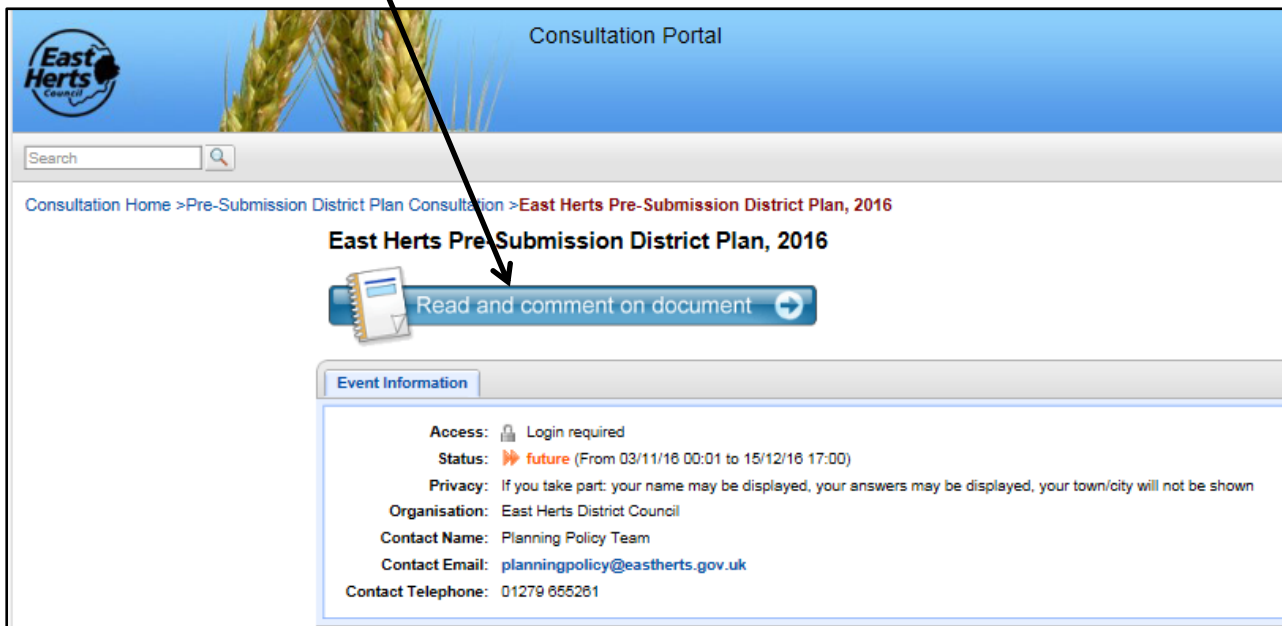
Show Consultations for: All Topics

List View Date View

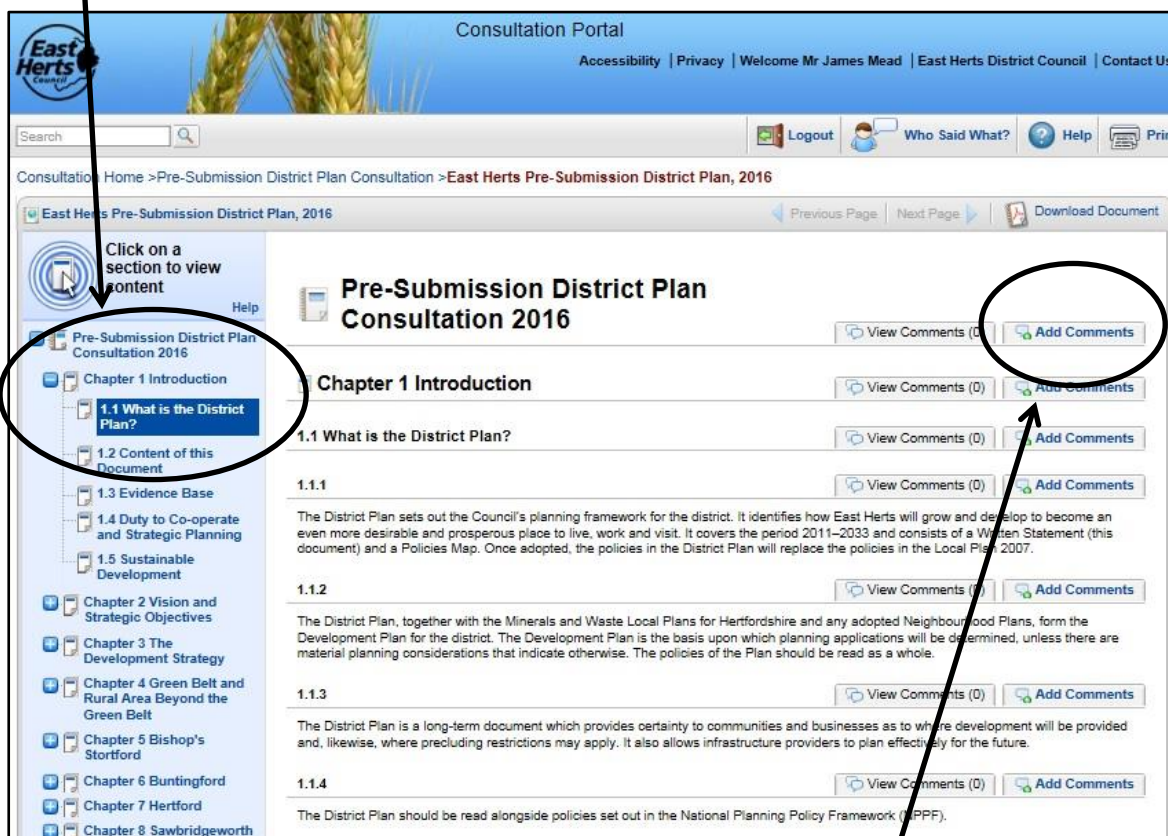
Consultation	Start	End	Status
Bishop's Stortford North Interim Planning Brief	01/07/13 16:00	16/08/13 17:00	closed
Draft Statement of Community Involvement	21/03/13 00:01	02/05/13 17:00	closed
East Herts Core Strategy Consultation	02/09/10 10:00	25/11/10 17:00	closed
Mead Lane Urban Design Framework	18/08/11 00:00	28/07/11 17:00	closed

Number of items to display: 20 Page 1 of 1 Displaying 1 to 4 of 4 items

8) Click 'Read and comment on document'.



9) You can navigate around the document using the table of contents. Click the plus sign to expand the menu for sub-sections.



10) Choose which part of the document you wish to comment on and click 'Add Comments'. You will also be able to view any comments made by others in a tab called 'View Comments'.

11) Once you have clicked to make a comment a text box will appear on your screen, it is important to read this information before proceeding any further.

Click on a section to view content

Pre-Submission District Plan Consultation 2016

Chapter 1 Introduction

Chapter 2 Vision and Strategic Objectives

Chapter 3 The Development Strategy

Chapter 4 Green Belt and Rural Area Beyond the Green Belt

Chapter 5 Bishop's Stortford

Chapter 6 Buntingford

Chapter 7 Hertford

Chapter 8 Sawbridgeworth

Chapter 9 Ware

Chapter 10 Villages

Chapter 11 The Gilston Area

Chapter 12 East of Stevenage

Chapter 13 East of Welwyn Garden City

14 Housing

15 Economic Development

Pre-Submission District Plan Consultation 2016

View Comments (0) Add Comments

These comments relate to this document as a whole. If you have a comment on a specific section or paragraph it would be better to add the comment at that level.

Warning: your session may timeout after an hour, to avoid any data loss please use the Save as draft button at the bottom of the page.

Comment Form - Information

East Herts Council has produced its District Plan which sets out the planning framework for the District for the period 2011-2033. There have been two previous iterations (Issues and Options, 2010 and Preferred Options, 2014) that have been subject to Public Consultation and the Council now considers it has a sound plan to submit to the Planning Inspectorate.

The District Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements and whether it is sound. A local Planning Authority should submit a plan for examination which it considers to be sound namely that it is:

- Positively Prepared** - the Plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified** - the Plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence;
- Effective** - the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy** - the Plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Comments submitted in this consultation should have regard for whether the plan is legally compliant, compliant with the Duty to Co-operate and compliant with the four tests of soundness.

East Herts Council is also seeking to understand if respondents wish to take part in the oral part of the examination of the plan.

Please click next below to proceed to make your representation.

Cancel Save as draft Next

12) Once you have read the information click 'next' to proceed to make your comment.

13) You will now have to answer Questions 1 and 2 regarding the legality and soundness of the District Plan.

Pre-Submission District Plan Consultation 2016

Chapter 1 Introduction

Chapter 2 Vision and Strategic Objectives

Chapter 3 The Development Strategy

Chapter 4 Green Belt and Rural Area Beyond the Green Belt

Chapter 5 Bishop's Stortford

Chapter 6 Buntingford

Chapter 7 Hertford

Chapter 8 Sawbridgeworth

Chapter 9 Ware

Chapter 10 Villages

Chapter 11 The Gilston Area

Chapter 12 East of Stevenage

Chapter 13 East of Welwyn Garden City

14 Housing

15 Economic Development

16 Retail and Town Centres

17 Design and Landscape

Pre-Submission District Plan Consultation 2016

View Comments (0) Add Comments

These comments relate to this document as a whole. If you have a comment on a specific section or paragraph it would be better to add the comment at that level.

Warning: your session may timeout after an hour, to avoid any data loss please use the Save as draft button at the bottom of the page.

1

Do you consider the proposed District Plan to be?

	Yes	No
* Legally Compliant	<input type="radio"/>	<input type="radio"/>
* Compliant with Duty to Co-operate	<input type="radio"/>	<input type="radio"/>
* Sound	<input type="radio"/>	<input type="radio"/>

2

Do you consider the proposed Pre-Submission District Plan to be?

	Yes	No
* Positively prepared	<input type="radio"/>	<input type="radio"/>
* Justified	<input type="radio"/>	<input type="radio"/>
* Effective	<input type="radio"/>	<input type="radio"/>
* Consistent with national policy	<input type="radio"/>	<input type="radio"/>

- 14) Scroll down and you can make your comments at part 3a. Accompanying documents can be attached at part 3b. Please note part 3c will only appear on your screen if you have answered 'no' to any of the statements in part 1 and 2.

18 Transport
19 Community Facilities, Leisure and Recreation
20 Natural Environment
21 Heritage Assets
22 Climate Change
23 Water
24 Environmental Quality
25 Delivery and Monitoring
Appendix A Key Diagram
Appendix B Strategy Worksheet
Appendix C Monitoring Framework
Appendix D Glossary

3a
Please make your comments here, taking consideration of whether you feel the Pre-Submission District Plan is legally compliant, compliant with the duty to co-operate and sound.

3b
If you consider it necessary to upload a file to support your representation please do so here.
Upload: Browse...
Title:

3c
Please set out the modification(s) you consider necessary to make the Pre-Submission District Plan legally compliant, compliant with the duty to co-operate or sound.

- 15) Scroll down and you will have to answer part 4a regarding whether you wish to participate at the oral examination of the plan. Please note part 4b will only appear on your screen if you answer 'yes' to part 4a.

4a
✔ Do you consider it necessary to participate at the oral part of the examination?
 Yes No

4b
★ If you consider it necessary to speak at the examination, please outline below why you consider it to be necessary.

✔ There are no more questions. Please click **Submit to finish and wait for the confirmation message**. Once submitted you will no longer be able to modify your answers. Thank you for your time.
📄 If you are logged in, you can save your form if you are not quite finished and would like to come back to it later. You will be able to see all unsubmitted forms in "Your Account" and submit or edit them at any time.
❌ Cancel if you want to disregard the answers/changes you have made since your last save.

4a

✔ Do you consider it necessary to participate at the oral part of the examination?

Yes No

4b

★ If you consider it necessary to speak at the examination, please outline below why you consider it to be necessary.

✔ There are no more questions. **Please click Submit to finish and wait for the confirmation message.** Once submitted you will no longer be able to modify your answers. Thank you for your time.

📄 If you are logged in, you can save your form if you are not quite finished and would like to come back to it later. You will be able to see all unsubmitted forms in "Your Account" and submit or edit them at any time.

✖ Cancel if you want to disregard the answers/changes you have made since your last save.

✖ Cancel 📄 Save as draft ✔ Submit

16) Finally, once you have finished answering each section you can choose to save it as a draft to complete later or submit the comment. If you choose to save to draft, remember to return at a later time and submit your comments or they will not be registered. Once submitted you will be unable to change your comment and it will become visible to others once processed by the Council.

17) You will get an email confirmation that your comment has been submitted and another email at a later time when it has been initially processed.

18) A Site Tour is also available on the Consultation Portal home page if you would like further information on completing your registration and entering comments.

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Frequently Asked Questions



Pre-Submission Consultation 2016

East Herts District Plan Pre-Submission Version (Regulation19)

Frequently Asked Questions

- 1. What is this consultation about?**
- 2. How long does the consultation last?**
- 3. Why should I comment?**
- 4. Can comments only be made on soundness and legal compliance?**
- 5. Hasn't the public already been consulted on the District Plan?**
- 6. I made comments on the Preferred Options consultation; do I need to comment again?**
- 7. Why does it take so long to produce a District Plan and who decides whether the Plan meets the Government's approval?**
- 8. What happens when people comment on the District Plan?**
- 9. What is an Examination?**
- 10. How do I make my views known?**
- 11. Where can I find the documents?**
- 12. Can I buy a copy of the District Plan?**
- 13. Questions**

1. What is this consultation about?

East Herts Council is consulting on the latest version of the East Herts District Plan. This stage is known as the Regulation 19 consultation, which is the final public consultation stage before the District Plan is submitted to the Planning Inspectorate for Examination. At this stage the Plan is known as the East Herts District Plan (Pre-Submission Version).

The Pre-Submission Plan takes forward a revised version of the earlier Preferred Options Plan, which was consulted on in 2014. Comments made in respect of this earlier consultation have been considered alongside updated evidence in preparing the Pre-Submission Plan.

The Pre-Submission Plan sets out the vision, policies and proposals to guide future development and the use of land within East Herts. It provides certainty to members of the public and developers as to where development is likely to take place and guides decision-takers on the most appropriate forms of development over the Plan-period to 2033.

2. How long does the consultation last?

The Pre-Submission District Plan will be available for comments for a period of six-weeks from **Thursday 3rd November** to 5pm on **Thursday 15th December 2016**.

Comments submitted after that 5pm on the 15th December may not be considered.

3. Why should I comment?

As a place shaping document, everyone can be affected and so everyone should have the opportunity to contribute – it is important to engage in the preparation of the District Plan.

4. Can comments only be made on soundness and legal compliance?

At this stage the Council is seeking views on whether the District Plan is sound and meets the tests set out in the National Planning Policy Framework (NPPF). In other words whether:

- the Council has planned for the district's housing, employment and infrastructure needs;
- the District Plan is based on sound evidence;
- the development proposals identified within the District Plan can be delivered by 2033; and
- the District Plan is consistent with national policy, and enables sustainable development.

Comments will be passed to the Inspector and it is recommended that comments should be clear, concise and targeted. While respondents are free to comment as they choose, in order to have the greatest influence at this stage it is advisable that comments should relate to the soundness of the Pre-Submission Plan or to its compliance with legal requirements. These are explained below.

Soundness

Regulations state that a local planning authority should submit a Plan for examination which it considers to be 'sound' – namely that it is:

- **Positively prepared** – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policies** – the Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

It is advisable that comments made at this stage should therefore focus on whether the Plan meets the tests listed above. This is because these are the broad areas that the Inspector will focus on in examining the District Plan.

Legal Requirements

When considering if the Plan meets its legal requirements, the Inspector will consider a number of issues including:

- **Local Development Scheme** – has the Plan been prepared in accordance with the timetable set out on the Local Development Scheme?
- **Statement of Community Involvement and relevant regulations** – has consultation on the Plan been in accordance with the Council's Statement of Community Involvement and have the appropriate bodies been consulted?
- **Duty to Co-operate** – has the Plan been prepared in co-operation with other local planning authorities and prescribed bodies, such as the Environment Agency and the Local Enterprise Partnership, to identify and address any issues?
- **Sustainability Appraisal** – has an adequate Sustainability Appraisal been carried out?
- **Appropriate Assessment** – has an adequate Appropriate Assessment under the Habitats Regulations been carried out?

- **National Policy and Legislation** – does the Plan comply with national policy and legislation, for example, the National Planning Policy Framework.

5. Hasn't the public already been consulted on the District Plan?

Yes – we have consulted the public several times over the last few years, most recently in 2014 when we received comments from over a thousand stakeholders including statutory consultees and members of the public.

The diagram below shows the District Plan process:



6. I made comments on the Preferred Options consultation; do I need to comment again?

The Council is not able to carry forward any comments made on previous consultations. Therefore, any comments previously submitted that you think have not been resolved would need to be submitted again as part of this consultation.

7. Why does it take so long to produce a District Plan and who decides whether the Plan meets the Government's approval?

Local Plans must be based on robust and up-to-date evidence, which meets legal requirements and tests of soundness. Evidence is rigorously tested and challenged by a Planning Inspector at an independent Examination. Many plans have had to be withdrawn for various reasons before or after Examination, including failure to comply with national policy statutory requirements. The Council should not submit its local plan before it is confident that it will succeed at Examination. To do otherwise would be inefficient and wasteful of resources, and ultimately delay adoption.

Without an adopted District Plan the district will be vulnerable to further unplanned development which may occur in undesirable locations.

8. What happens when people comment on the District Plan?

The Council will collate all the comments received during the consultation period and these will be submitted alongside the District Plan to the Planning Inspectorate.

The Council intends to submit the District Plan, the evidence supporting it, and comments received during the Pre-Submission consultation to the Planning Inspectorate in March 2017. Following this an independent Examination will take place.

9. What is an Examination?

An Examination is a form of public inquiry where an independent planning inspector, appointed by the Secretary of State, will 'test' the Plan and supporting information and judge whether it is sound and meets its legal requirements.

Further information will be provided about the Examination process before that stage begins. It is currently anticipated that the Examination will commence in late Spring/Summer 2017.

10. How do I make my views known?

There are different ways to send in your comments:

- Online at <http://consult.eastherts.gov.uk>. This is the most convenient means of submitting comments and ensures that you will be kept informed of future stages of plan preparation.
- Via email or post. A comment form can be used, which is available from the District Council and from libraries. The form should be sent to planningpolicy@eastherts.gov.uk or posted to: Planning Policy Team, East Herts Council, Pegs Lane, Hertford, SG13 8EQ.

**Remember the deadline for all comments is 5pm on
Thursday 15th December 2016.**

Please note – comments can only be deemed legitimate ('duly-made') if they are received in a written format with a name and address supplied. Comments made verbally or anonymously cannot be accepted. It is also important to appreciate that the Council is obliged to make duly-made comments available for public inspection on its website.

11. Where can I find the documents?

The District Plan and supporting documents will be available for public inspection during normal offices hours at the following locations:

- East Herts Council Offices, Wallfields, Pegs Lane, Hertford
- East Herts Council Offices, Charringtons House, The Causeway, Bishop's Stortford
- Bishop's Stortford Town Council, The Old Monastery, Windhill, Bishop's Stortford
- Bishop's Stortford Public Library, 6 The Causeway, Bishop's Stortford
- Buntingford Town Council, The Manor House, 21 High Street, Buntingford
- Buntingford Public Library, 77 High Street, Buntingford
- Hertford Town Council, The Castle, Hertford
- Hertford Public Library, Dolphin Yard, Maidenhead Street, Hertford
- Knebworth Public Library, 7 St Martin's Road, Knebworth
- Sawbridgeworth Town Council, Sayesbury Manor, Bell Street, Sawbridgeworth
- Sawbridgeworth Public Library, The Forebury, Sawbridgeworth
- Ware Town Council, The Priory, Ware
- Ware Public Library, 87 High Street, Ware

The District Plan and supporting documents can also be viewed online at: www.eastherts.gov.uk/districtplan.

12. Can I buy a copy of the District Plan?

A limited number of copies of the District Plan are available to purchase from the Council. The District Plan and accompanying Policies Map cost £35.00.

13. Questions

If you have any questions about the District Plan please contact a member of the Planning Policy Team on 01279 655261 or email planningpolicy@eastherts.gov.uk.

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East Herts District Plan - Pre-Submission Consultation

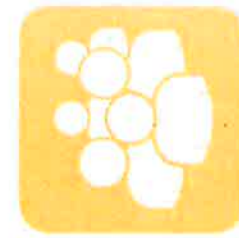


**Now is your
final chance
to comment on the District Plan**

**The best way to comment – visit
<http://consult.eastherts.gov.uk>**

Or collect a form from the council or library to return by post

Consultation: from November 3 until 5pm on December 15 2016



The District Plan identifies how East Herts will grow and develop while at the same time maintaining its attractiveness as a place to live, work in and visit.



Following the consultation - see over for details - the District Plan will be submitted to the Planning Inspectorate for an independent examination.



You can see the District Plan and supporting documents, including Frequently Asked Questions, at the council offices and the libraries in the district.



All documents are also on the council's website at www.eastherts.gov.uk/districtplan





East Herts District Plan



**Pre-Submission Consultation -
November 3 until 5pm December 15 2016**

**Now is your last opportunity
to comment on the
District Plan**

**The best way to comment –
<http://consult.eastherts.gov.uk>**

**Comment forms are also available online or from the Council's
offices and local libraries**

 @Eastherts

 EastHertsDC

www.eastherts.gov.uk/districtplan



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Statement of Representations Procedure

The Town and Country Planning (Local Planning) (England) Regulations 2012

Title of the Plan which the Local Planning Authority proposes to submit to The Secretary of State.	East Herts District Plan
Subject matter and the area covered by the District Plan.	Planning policies for the control of development and the use of land in the administrative area of East Hertfordshire District over the period to 2033.
The date by which comments on the District Plan must be received.	Thursday 15 th December 2016 (no later than 5pm)
The address to which comments about the District Plan must be made.	Planning Policy Team East Herts Council Wallfields Pegs Lane Hertford Hertfordshire, SG13 8EQ
Comments may be made in writing or by way of electronic communications.	In addition to the postal address above, comments may be submitted by the following electronic means: Online: http://consult.eastherts.gov.uk/portal Email: planningpolicy@eastherts.gov.uk

Comments may be accompanied by a request to be notified at a specified address or email address of any of the following:

- The submission of the East Herts District Plan for independent examination under section 20 of the Planning and Compulsory Purchase Act 2004 (“the Act”);
- The publication of the recommendations of the person appointed to carry out an independent examination of the District Plan under section 20 of the Act; and
- The adoption of the East Herts District Plan.



Statement of Availability

The Town and Country Planning (Local Planning) (England) Regulations 2012

The Pre-Submission District Plan and supporting documents are available for public inspection during normal office hours at the East Herts Council Offices in Hertford and Bishop's Stortford, town council offices and in libraries across the district.

East Herts Council (Hertford Office) Wallfields, Pegs Lane, Hertford, SG13 8EQ	East Herts Council (Bishop's Stortford Office) Charringtons House, The Causeway, Bishop's Stortford, CM23 2EN
Bishop's Stortford Town Council, The Old Monastery, Windhill, Bishop's Stortford, CM23 2ND	Bishop's Stortford Public Library, 6 The Causeway, Bishop's Stortford, CM23 2EJ
Buntingford Town Council, The Manor House, 21 High Street, Buntingford, SG9 9AB	Buntingford Public Library, 77 High Street, Buntingford, SG9 9AE
Hertford Town Council, The Castle, Hertford, SG14 1HR	Hertford Public Library, Dolphin Yard, Maidenhead Street, Hertford, SG14 1DR
Sawbridgeworth Town Council, Sayesbury Manor, Bell Street, Sawbridgeworth, CM21 9AN	Sawbridgeworth Public Library, The Forebury, Sawbridgeworth, CM21 9BD
Ware Town Council, The Priory, High Street, Ware, SG12 9AL	Ware Public Library, 87 High Street, Ware, SG12 9AD
	Knebworth Public Library, 7 St Martins Road, Knebworth, SG3 6ER

All consultation documents as well as supporting technical studies are available to view on the East Herts Council website at: www.eastherts.gov.uk/presubmissiondistrictplan

The consultation documents include:

- Pre-Submission District Plan, 2016
- Policies Map
- Sustainability Appraisal (SA)
- Comment Form
- Consultation Portal Guidance Note
- Frequently Asked Questions
- Statement of Representations Procedure

Comments on the Pre-Submission District Plan should be made via the online consultation portal accessed at: <http://consult.eastherts.gov.uk/portal>. Alternatively, you can complete a Comment Form which is available on the website. The Comment Form can either be e-mailed to planningpolicy@eastherts.gov.uk or posted to East Herts Council (Hertford Office).

Local Authority Notices



**Statement of Availability
The Town and Country Planning
(Local Planning) (England) Regulations 2012
Regulation 19 (Publication of a Local Plan)**

**East Herts Pre-Submission District Plan
Consultation 2016**

The Pre-Submission District Plan and supporting documents are available for public inspection during normal office hours at the East Herts Council Offices in Hertford and Bishop's Stortford, town council offices and in libraries across the district.

Period of Publication: Comments can be made in writing between the 3rd November 2016 and the 15th December 2016. Comments must be received by 5pm on the 15th December 2016.

Document Availability: The consultation documents include:

- Pre-Submission District Plan
- Set of Policies Maps
- Sustainability Appraisal
- Statement of Availability
- Statement of Representations Procedure
- Frequently Asked Questions
- Consultation Portal Guidance
- Comment Form

All consultation documents as well as supporting technical studies are available to view on the East Herts Council website at: www.eastherts.gov.uk/presubmissiondistrictplan

East Herts Council (Hertford Office)
Wallfields, Pegs Lane, Hertford, SG13 8EQ

Bishop's Stortford Town Council,
The Old Monastery, Windhill,
Bishop's Stortford, CM23 2ND

Buntingford Town Council,
The Manor House, 21 High Street,
Buntingford, SG9 9AB

Hertford Town Council,
The Castle, Hertford, SG14 1HR

Sawbridgeworth Town Council,
Sayesbury Manor, Bell Street,
Sawbridgeworth, CM21 9AN

Ware Town Council,
The Priory, High Street, Ware, SG12 9AL

East Herts Council (Bishop's Stortford Office)
Charringtons House, The Causeway,
Bishop's Stortford, CM23 2EN

Bishop's Stortford Public Library,
6 The Causeway, Bishop's Stortford, CM23 2EJ

Buntingford Public Library,
77 High Street, Buntingford, SG9 9AE

Hertford Public Library,
Dolphin Yard, Maidenhead Street, Hertford, SG14 1DR

Sawbridgeworth Public Library,
The Forebury, Sawbridgeworth, CM21 9BD

Ware Public Library,
87 High Street, Ware, SG12 9AD

Knebworth Public Library,
7 St Martins Road, Knebworth, SG3 6ER

How to respond

Online: You can access the online Consultation Portal directly using the following link: <http://consult.eastherts.gov.uk>

By email: A comment form is available online which you can complete and return by email to the Planning Policy Team at: planningpolicy@eastherts.gov.uk

By post: Alternatively you can send your completed comment form to East Herts Council, Planning Policy Team, Wallfields, Pegs Lane, Hertford, Herts, SG13 8EQ.

Comments may be accompanied by a request to be notified of the following:

- When the Council submits the Plan to the Planning Inspectorate for independent examination;
- When the Planning Inspector publishes their recommendations; and/or
- When the Council adopts the District Plan.

For queries on the consultation please email planningpolicy@eastherts.gov.uk or contact 01279 655261.

www.eastherts.gov.uk

Local Authority Notices



**Statement of Availability
The Town and Country Planning
(Local Planning) (England) Regulations 2012
Regulation 19 (Publication of a Local Plan)**

**East Herts Pre-Submission District Plan
Consultation 2016**

The Pre-Submission District Plan and supporting documents are available for public inspection during normal office hours at the East Herts Council Offices in Hertford and Bishop's Stortford, town council offices and in libraries across the district.

Period of Publication: Comments can be made in writing between the 3rd November 2016 and the 15th December 2016. Comments must be received by 5pm on the 15th December 2016.

Document Availability: The consultation documents include:

- Pre-Submission District Plan
- Set of Policies Maps
- Sustainability Appraisal
- Statement of Availability
- Statement of Representations Procedure
- Frequently Asked Questions
- Consultation Portal Guidance
- Comment Form

All consultation documents as well as supporting technical studies are available to view on the East Herts Council website at: www.eastherts.gov.uk/presubmissiondistrictplan

East Herts Council (Hertford Office)
Wallfields, Pegs Lane, Hertford, SG13 8EQ

Bishop's Stortford Town Council,
The Old Monastery, Windhill,
Bishop's Stortford, CM23 2ND

Buntingford Town Council,
The Manor House, 21 High Street,
Buntingford, SG9 9AB

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The Castle, Hertford, SG14 1HR

Sawbridgeworth Town Council,
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Charringtons House, The Causeway,
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How to respond

Online: You can access the online Consultation Portal directly using the following link: <http://consult.eastherts.gov.uk>

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By post: Alternatively you can send your completed comment form to East Herts Council, Planning Policy Team, Wallfields, Pegs Lane, Hertford, Herts, SG13 8EQ.

Comments may be accompanied by a request to be notified of the following:

- When the Council submits the Plan to the Planning Inspectorate for independent examination;
- When the Planning Inspector publishes their recommendations; and/or
- When the Council adopts the District Plan.

For queries on the consultation please email planningpolicy@eastherts.gov.uk or contact 01279 655261

www.eastherts.gov.uk

Local Authority Notices



**The Neighbourhood Planning (General)
Regulations 2012 Regulation 16
(Publicising a Neighbourhood Plan)**

**Bishop's Stortford Neighbourhood Plan for All Saints,
Central, South and part of Thorley 2016-2032**

Subject Matter: The Neighbourhood Plan has been prepared in the context of the 2007 East Herts Local Plan and contains policies relating to Housing and Design, Green Infrastructure, Transport, Education, Health, Sport, Leisure & Community, Business and Employment; and also for sites allocated in the East Herts Pre-Submission District Plan at The Goods Yard, Land south of Bishop's Stortford, Bishop's Stortford High School Site, East of Manor Links. The Plan does not allocate any land for development.

Area covered: The Neighbourhood Plan covers the wards of Bishop's Stortford All Saints, Bishop's Stortford Central, Bishop's Stortford South and part of Thorley.

Period of Publication: Representations can be made in writing between the 3rd November 2016 and the 15th December 2016. Representations must be received by 5pm on the 15th December 2016.

Address to which representations should be sent:

By post: Planning Policy, East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ.
By email: planningpolicy@eastherts.gov.uk

Format of representations: Representations may be made in writing or electronically. A standard comment form is available.

Request to be Notified: Representations may be accompanied by a request to be notified of the local planning authority's decision under Regulation 19. That is the decision whether or not to make the Neighbourhood Plan part of the development plan for East Herts District.

Document Availability: The publication material consists of:

- Bishop's Stortford Neighbourhood Plan for All Saints, Central, South and part of Thorley 2016-2032
- Bishop's Stortford Neighbourhood Plan for All Saints, Central, South and part of Thorley 2016-2032 Policy Maps
- Basic Conditions Statement
- Consultation Statement plus appendices
- Supporting Statement - Evidence Base

The publication material will be available for inspection during normal office hours at:

- East Herts Council Offices, Charringtons House, Bishop's Stortford, CM23 2EN
- East Herts Council Offices, Wallfields, Pegs Lane, Hertford, SG13 8EQ
- Bishop's Stortford Town Council, The Old Monastery, Windhill, Bishop's Stortford, CM23 2ND
- Bishop's Stortford Public Library, 6 Causeway, Bishop's Stortford, CM23 2EJ

All the documents, including a comment form, are also available on the Council's website at: www.eastherts.gov.uk/bsnp2

If you need any further information or assistance please contact the Planning Policy Team on 01279 655261 or email planningpolicy@eastherts.gov.uk

www.eastherts.gov.uk

Appendix G: 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			

In addition to the above, 481 standard responses were received in relation to Watton-at-Stone and 2,184 standard responses received in relation to Stop Harlow North.

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Appendix H: Respondents to Regulation 19 Consultation

Specific Consultation Bodies

- Environment Agency
- Essex County Council
- Hertfordshire County Council: Ecology, Education, Historic Environment, Minerals and Waste, Property (Development Services), Property (Landowner) Public Health and Transportation
- Hertfordshire Local Enterprise Partnership (represented by CIVIX)
- Historic England
- Lee Valley Regional Park Authority
- Natural England
- Neighbouring Authorities: Broxbourne Borough Council, Epping Forest District Council, Harlow District Council, North Hertfordshire District Council, Stevenage Borough Council, Uttlesford District Council
- Other Hertfordshire Authorities: Three Rivers District Council
- Stansted Airport
- Thames Water

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

Other Town and Parish Councils	
Roydon Parish Council	

General Consultation Bodies and Other Organisations	
Aston Village Society	Home Builders Federation
Bat Conservation Trust	Hormead CE (VA) First and Nursery School
Bishop's Stortford and District Footpaths Association	Leventhorpe School
Bishop's Stortford Civic Federation	Mandeville Primary School

Bishop's Stortford Climate Group	Molewood Residents Association
Bishop's Stortford Mencap	PACE (Protecting Aston's Community Existence)
Bishop's Stortford Rugby Club	PORA (Protection of the Roydon Area)
Caxton Hill Motors	Rambles' Association
Central Hertfordshire Green Corridor Group	River Beane Association
CPRE Hertfordshire	Sport England
Easneye Farms	Stephen Austin
East Herts Rural Branch Labour Party	Stevenage Liberal Democrats
Education Funding Agency	The Bishop's Stortford High School
Edwinstree Middle School	The Roydon Society
Environment Bank	The Theatres Trust
Fluorocarbon Group	The Ware Society
Friends of Panshanger Park	Ware Arts Centre
Hertford Civic Society	Ware Lions Football Club
Hertfordshire Gardens Trust	Welwyn Garden Society
Herts Against the Badger Cull	Widbury Residents Association
Herts and Middlesex Badger Group	Wodson Park Trust
Herts and Middlesex Wildlife Trust	

Members of Parliament	
MP Mark Prisk	MP Stephen McPartland

East Herts Council	
Councillors	Officers
Councillor Bob Deering	Andrew Stevenson (Environment and Engineering Department)
Councillor Gary Jones	Paul Stevens (District Landscape Officer)

Land Owners, Developers and Others with Property Interest of Represented by Agent	
Name (Company/Organisation)	Representing Agent
A T Bone & Sons	Jane Orsborn Associates
Aldi Stores Limited	Planning Potential
Ashley, Sylvia	Sworders
Bailey, David	Andrew Martin Planning
Barratt David Wilson North Thames	Strutt and Parker
Barratt North London	Jane Orsborn Associates
Barton, John	Jane Orsborn Associates
Bayfordbury Estates	Jane Orsborn Associates
Beechwood Homes	Boyer Planning
Bellis Homes	Rumball Sedgwick
Bennison, T	Jane Orsborn Associates
Bishop's Stortford College	Sworders
Bovis Homes and Wattsdown Limited	DLP Planning

Cambrills Limited	Andrew Martin Planning
Catesby Estates Limited	Strutt and Parker
CEG Hallam Land Management Limited	Boyer Planning
Chaldean Estate	Strutt and Parker
Chapman, James	Barker Parry Town Planning Limited
Chelmsford City Developments	Andrew Martin Planning
Christ's Hospital Foundation	Gerald Eve LLP
City and Country	Strutt and Parker
City and Provincial Properties (joint response submitted with Places for People)	Quod
Mr and Mrs Colhoun	Strutt and Parker
Cooper, Bruce	Jane Orsborn Associates
Mr and Mrs M Cooper	Jane Orsborn Associates
Countryside Properties	Andrew Martin Planning
Crest Nicholson	Savills
Croudace Homes	Woolf Bond Planning
David Lock Associates	
Del Basso, Luigi	Jane Orsborn Associates
Deville Estates	Andrew Martin Planning
Doyle, Kevin	Hertford Planning Service
Fairview New Homes	Vincent and Gorbing
Foxley Builders	Sworders
French and Jupp Limited	JB Planning Associates
Gascoyne Cecil Estates	JB Planning Associates
The Gates Family	Sworders
Gladman Developments	
Mr B Greenwold	Barker Parry Town Planning Limited
Mr and Mrs Glencross	Rumball and Sedgwick
Gowling WLG Trust	Sellwood Planning
Haileybury College	Sworders
Hertford Holdings Limited	JB Planning Associates
Hertfordshire County Council (Property)	
Hill Residential	Bidwells
Hubert C Leach (Nuns Triangle) Limited	Barker Parry Town Planning Limited
Hughes, Bernard and Lynda	JB Planning Associates
Hughes, Clew	Stuart Cunliffe
Iceni Projects	
The J C and L B Thomson Trust	Jane Orsborn Associates
Kler Group Limited	Cerda Planning
Lafarge Tarmac	David Lock Associates
LaSelle Investment	Boyer Planning
Legal and General	Savills
London and Regional	Rapleys LLP
Long, Julian	Waller Planning
Lunar Retail Sarl	Planning Works Limited
Marchfield Properties Limited	JB Planning Associates
Martin Grant Homes, Persimmon Homes	Pegasus Group

and Taylor Wimpey	
Matterhorn Capital DC Bury Green S.A.R.L	Daniel Rinsler and Co
McMullen & Sons Limited	Barker Parry Town Planning Limited
Morris, Chris	Andrew Martin Planning
Newton, Philip	Nathaniel Lichfield and Partners
The Oakhall Group	Arc Planning
Oakley, Brian	Jane Orsborn Associates
Orione Care	Gerald Eve LLP
The Pallet and Scale Families	Brignalls Balderston Warren
Persimmon Homes Essex	
Pigeon Investment Management Limited	Evolution Town Planning Limited
Pigeon Land Limited	Terence O'Rourke Limited
Places for People (joint response submitted with City and Provincial Properties)	Quod
Planning and Development Associates	
Pope, Mary and Beaumont, Roger and the Wentworth Stanley Family	Framptons Planning
Ptarmigan Planning	Barton Willmore
PWRE	
Rayner, David	Edward Gittins and Associates
Reading, Julian	Jane Orsborn Associates
Rose, Jonathan	RR Planning Limited
Royal Mail Group Limited	Cushman and Wakefield
Sainsburys Supermarket Limited	Indigo Planning
Scott Properties	
Silver Spoon	Rapleys LLP
Smart Street Furniture	Simply Planning Limited
Solumn Regeneration	Savills
St. Albans Diocesan Board of Finance	Bidwells
St. John's College Cambridge	Savills
St. William	Nathaniel Lichfield and Partners
STOP Harlow North (SNH)	Jed Griffiths
Sunland Nominees Pty Limited	Strutt and Parker
Surrige, Robert	Sellwood Planning
Tarmac Trading Limited	David Lock Associates
Taylor Wimpey Limited	Pegasus Group
Troy Navigus Partnership (on behalf of Eastwick and Gilston Parish Council and Hunsdon Parish Council)	
The United Reformed Church	The Planning Law Practice
Waitrose	Firstplan
Warner-Smith Trustees	Simmons and Sons
Wattsdow Development Limited	
Weston Homes	
Woodhall Farming Company	Strutt and Parker
Wright, Philip	PPML Consulting Limited

Individuals	
Family Name	Given Name
Abbey	Paul
Abbott	Sarah
Abrahams	Gillian
Adams	J
Adams	Matthew
Adams	Lorraine
Agate	Jeffrey
Agate	Jeff
Ainsworth	Sally
Aknai	Jeremy
Alan	C
Alderman	Richard
Alderman	Margaret
Aldridge	Lisa
Alexander	Nicholas
Alixandior	J C
Allday	Raymond
Allen	C
Allen	Alex
Allenby	Laura
Al-Seffar	A
Ambler	Diane
Ambler	Clive
Anderson	John
Anderson	Neil
Anderson	Gary
Anderson	Olivia
Anderson	Fiona
Anderson	Charles
Ansell	Hannah
Armour	Katherine
Arnold	Mike
Ashby	David
Ashley	Sylvia
Ashley	John
Ashley	Brenda
Ashley	G
Ashton	Matthew
Ashwell	Antony
Atkins	Clive

Atkins	Janet
Atkins	Dennis
Atkins	Roy
Atkins	Suzanne
Atkins	S
Atkins	Sara
Austin	Gary
Austin	Jennifer
Austin	Emily
Ayree	Jordan
Ayrton	Martin
B	Peter
Backshall	Paul
Bacon	Margaret
Badrock	Jane
Badrock	Jane
Baggs	Simon
Baggs	Vanessa
Bagnall	Sarah
Bailer	M.G.
Bailey	T
Bailey	Mark
Bailey	Charlotte
Baird	Lorna
Baird	Andrew
Baird	Kate
Baird	Kelly
Baker	Nicola
Baker	Adrian
Baker	Glynis
Baker	Mark
Baker	Michael
Baker	Sarah
Baker	Sue M
Balfour	Kam
Bamford	Steve
Banks	Carole
Bannerman	Calum
Bannerman	Selina
Bansal	Sarita
Barber	Ed
Barclay	India

Barclay	Susan
Barker	Susan
Barker	Maxine
Barker	Lionel
Barker	Jean
Barklem	Ruth
Barnes	Mark
Barnes	Alison
Barrett	Angela
Barrett	Brian
Barrett	Neil
Barron	Andrew
Barron	Dorothea
Barron	Charlie
Barton	S
Basavaraj	Diane
Bass	Shirley
Batchelor	Carol
Batchelor	Keith
Batchelor	Rachel
Baughn	Adrian
Baxter	Tony
Baxter	Helen
Baxter	Amanda
Baxter	Eileen
Baxter	Gillian
Baxter	T
Bayes	Elliott
Bayford	Stephen
Bayford	Anna
Bayford	Edouard
Bays	Paul
Beamish	Louise
Bean	Leslie
Bean	Joanna
Bean	John
Bearman	Kerry
Bearman	Richard
Beaujeux	Catherine
Beaumont	Rebecca
Beazley	Edward
Beazley	Hugo
Beazley	Sarah
Beazley	Lucille

Beazley	Dan
Beddoes	Ray
Beddoes	Louise
Bedell-Brill	Florence
Beeching	Roger
Beeching	Roger H
Belcher	Joy
Belcher	DJ
Bell	Matt
Bell-Irving	Diana
Bellwood	Krysia
Bence-Trower	Nicholas
Bendin	Matthew
Bennett	Anthony
Bennett	Steven
Bennett	Edward
Bennett	Peter
Bennett	Sue
Bennett	George
Benstead	John
Benstead	David
Berendt	Annelise
Berou	Sheryl
Berry	Deanne
Best	Nigel
Best	Ann
Best	Terence
Bethell	Elizabeth
Bett	Hilary
Betts	Martin
Betty	Tasmin
Bevan	Isabelle
Bevan	Henrietta
Bevan	Freddie
Bevan	Jack
Bevan	Hugh
Bevan	Leonora
Bevan	Eloise
Bevan	John
Bevan	Mark
Bevan	Anna
Bevan	Joanne
Bevans	Pat
Beverley	Jeanne

Beverley	Bernard
Bickmore	Anthea M
Bickmore	Elsie
Bickmore	Anthony
Bindefield	Patricia
Birchenall	Danielle
Birchenall	Paul
Birchenall	Michelle
Bird	William
Bird	Danielle
Birkett	Joanna
Birks	Reighan
Birksy	Steven
Birt	Christopher
Biscoe	Neale
Biscoe	Lorraine
Biscoe	Peter
Bishop	David
Bissell	Peter
Blackett	Carol
Blake	Haidy
Blount	James
Blundell	Mick
Blundell	Linda
Blundell	Gary
Boenke	Robert
Bolton Carter	Georgina
Bond	Julian
Bone	Patricia
Bone	Matthew
Bonnick	Greg
Borowski	Zbigniew
Boston	Laura
Boston	Nathan
Boswell	Glen
Bott	Charles
bott	annabel
Boulas Ayad	Mary
Boulding	Harriet
Bourne	Steven
Bovill	Charlotte
Bovill	Imogen
Bowen	Will
Bowen	RJ

Bowen	Barry
Bowlby	Nicholas
Bowman	Nichole
Bowring	Frederick
Boxford Brookes	V
Boyd-Bowman	George
Boyd-Bowman	Thomas
Brace	Mark
Braggins	Nigel
Brazier	Robert
Brentnall	Giles
Brett	Ian
Brett	Virginia
Brett	Chris
Brett	Paul
Briault	Lorraine
Bridge	Wendy
Bridge	Jon
Bridgeman	Tracey
Bridgeman	Colin
Bridger	Stephanie
Bridle	Neil
Bridle	Sophia
Bridle	Christine
Bridle	Jeffrey
Bridle Bridle	Gabrielle
Briers	Irene
Briers	Peter
Brinn	Tony
Britton	Jan
Britton	Michael John
Britton	S
Brix	Ani
Broadbent	Terence
Brockbank	Sophie
Brocklehurst	Naomi
Brocklehurst	Elizabeth
Brookfield	Ann
Brooks	David
Broom	David
Brothers	Simon
Brown	Steven
Brown	Barbara
Brown	Terence

Brown	Douglas
Brown	Abby
Brown	Abby
Brown	Trevor
Brown	Anthony
Brown	Nick
Brown	J
Brown	Michael
Brown	S
Brown MBE	Norman
Bruce	Charlotte
Bruce	Christopher
Bruce	Susan
Bruce	Elizabeth
Bruce	Milly
Brummitt	Anita
Brun	Frederick
Brundle	John
Brunt	Harry
Brunton	Chris
Bryant	Piers
Bryant	Janine
Bryant	Liam
Bryant	Jim
Bryant	T
Bryce	Debbie
Buck	Michael
Buck	Jill
Buckle	Ann
Buckley	Ed
Bull	Harry
Bullock	J E
Bunting	Clementine
Burgess	Anthony
Burgess	Alex
Burgess	Katie
Burgess	Alan
Burlingham	Wayne
Burlingham	Liz
Burlison	John
Burnell	M
Burnet	Zoe
Burns	S
Burrell	Keith

Burrows	Peter
Burrows	Sandra
Burton	Reginald Alan
Burton	Anne
Burton	Stephen
Busby	T A
Busby	Thomas
Busby	Marion
Butcher	Martin
Butchers	Suzanne
Butfield	Tracey
Butler	Steve
Butler	Philip
Butler	D C
Butters	Kevin
Butters	Carol
Butti	Gina
Button	Barry
Buxley	PR
Buxton	Henrietta
Buxton	George
Buxton	Hugh
Buxton	Tom
Buxton	Edward
Buxton	Victoria
Byatt	Fiona
Byatt	Pat
Byatt	Tony
Byatt	Michael
Bye	Peter
Byrch	E
Byrch	Ed
Cacchioli	Kirsteen
Cacchioli	Kirsteen
Cadman	Derek
Cairns	Michael
Caldwell	Jill
Caledon	Lady
Cameron	Nigel
Campbell	Timothy
Campbell	Stef
Cannon	Lesley
Cannon	M J G
Cannon	L

Cannon	Emma
Cannon	Louisa
Carlaw	P
CARNEGIE	MARCIA
Carpenter	Pat
Carpenter	L
Carpenter	Stephen
Carruth	Helen
Carruth	John
Carter	D
Carter	Maria
Carter	Sarah
Carter	Ben
Carter	Dan
Carter	Nick
Carter	Kate
Carter	Sheila
Carter	Lilli-May
Carter	L.M.
Carter	Neal
Carter	Faye
Carthy	Bud
Carthy	Jackie
Carthy	Tim
Cartmale	Amanda
Cartman	F.D.
Cartmell	Matthew
Carty	William
Carver	Mike
Case	Steve
Case	Charles
Casey	Ayse
Cashmore	Daniel
Cashmore	Georgina
Cassidy	George
Castree	Leonard
Castree	Brenda
Caswell	Clifford
Cater	Rose
Cater	Michael
Catton	Brian
Catton	Alexander
Catton	James
Cesarz	Rafal

Chadee	Rai
CHALKLEY	C
Chalkley	M.J.
Chalkley	D
Chandler	Thomas
Chaplin	Jane
Chappell	Brian
Chappell	Tina
Chappell	Geoffrey
Cheek	Janet
Cherry	Alexander
Chesterton	Rodney
Chesterton	Taet
Chesterton	Julie
Chesterton	Connor
Chichester	Ottlie
Chilcott	Sarah
Child	David
Chilver	Mark
Choo	Teck-Kong
Clare	David
Clark	Rachel
Clark	Barnaby
Clark	Derek
Clark	Eileen
Clark	Richard
Clark	Amy
Clark	Kate
Clark	Michael
Clark	Deborah
Clark	Nigel
Clark	Hector
Clark	Digby
Clark	Harry
Clark	Tony
Clark	Maureen
Clark	Simon
Clark	Sam
Clark	Judith
Clark	Jenny
Clark	Holden
Clark	Daniel
Clark	Charleigh-Faye
Clark	D

Clarke	Lara
Clarke	David
Clarke	Yolande
Clarke	Nicholas
Clarke	John
Clarke	Judith
Clarke	M C
Clarke	G
Clay	Tim
Cleal	Joyce
Cleal	Michael
Clee	David
Clements	Paul
Clewes-Garner	Philip
Clewes-Garner	Robert
Clifton	Tracey
Clinch	Roy
Clutterbuck	Simon
Clutton	C
Cobb	Gareth
Cobb	Alison
Cocker	Michael
Cockman	Kealy
Cockman	Chris
Cockram	Natalie
Cocquerel	CT
Codd	Joanna
Coghill	Dave
Coghlán	Sarah
Cole	J
Colella	Katherine
Coles	Tom
Collings	Ann
Collins	Sara
Collins	David
Collins	Lisa
Collins	Jon
Collins	Terry
Collins	Glenis
Collins	Jess
Collins	Paula
Collins	Roy
Collins	James
Collins	Margaret

Collins	Jo
Collins	Noreen
Collins	Kath
Collins	Tony
Collinson	Nicola
Compton	Kim
Compton	William
Compton	Beryl
Compton	T
Compton	Joe
Conn	Jean
Conroy	S
Cook	Michael
Cook	Michael J
Cook	Harriet
Cook	Tony
Cooksey	Mike
Coombe	Stephen
Coombe	Carol
Cooper	Paul
Cooper	Gordon
Cooper	Jessica
Cooper	Michael
Cooper	Fini
Cooper	Amy
Cooper	Colin
Cooper	Charmaine
Copland	Philip
Coppard	James
Corben	Lindsey
Corbet	David
Corbett	Gerald
Corbett	Jane
Corbishley	Sarah
Corbishley	Martin
Cordingley	Geoffrey
Cornell	Kaymi
Cosgrove	Elizabeth
Cotterell	Joy
Cottrell	J.
Cowdrey	Chris
Cowdrey	Theresa
Cowell	Graham
Cowper	D

Cowperthwaite	Pauline
Cowperthwaite	Mark
Cowperthwaite	Liam
Cox	Nicholas
Cox	Michael
Cox	Charlotte
Cox	Russell
Cox	Sophie
Coxall	Ryan
Coxall	Elizabeth
Coy	Mark
Crace	Andrew
Cramond	Amanda
Crampin	Alice
Crank	Lynne
Croasdale	D
Crook	Sally
Croot	Patrick
Cross	Rich
Crowther	Anne
Crowther	Tim
Cubitt	Mark
Cummins	Jennifer
Cummins	Barry
Cummins	B
Cunningham	Jan
Cuomo	Dan
Cuomo	Helen
Currell	Richard
Currey	Hal
Curtis	Hannah
Curtis	Lana
Curtis	Terase
Curtis	Jon
Curtis	Deboah and Matthew
Curtis	Sean
Dailly	Sue
Dalli	George
Dance	Janet
Dance	Trevor
Dangell	Roger
Dangell	Dianne
Dangell	Robert
Dangell	Matthew

Daniels	Colin
Darnell	Andrew
Davey	Joe
Davidson	Robert
Davidson	Patricia
Davies	Trevor
Davies	Craig
Davies	Sian
Davies	Kitty
Davies	
Davies	Sian
Davis	Stephen
Davis	Ian
Davis	Michael & Sandra
Davis	Will
Davis	J
Dawson	Adam
Dawson	Elizabeth
Day	Andrew
Day	Christine
De boinville	Katie
de Rivaz	Mark
Dean	Paul
Dear	Susan
Dearden	Kevin
Deeks	Betty
Deether	Jacqueline
Dennis	Susan
Dent	David
Deterding	Gilda
Deveci	Feyza
Devitt	James
Devonshire	Carolyn
Dewhurst	Eleanor
Di Lello	Pasquale
Dibley	Russell
Dickinson	John
Dickinson	Irene
Dickinson	Linda
Dickinson	Scott
Dickinson	Catherine
Digby	Zara
Dillon	Martin
Diment	Thomas

Dineen	Diane
Dines	Paul
Dingwall	John
Dixon	Chris
Dixon	Jill
Dixon	Faye
Dixon	Lynette
Dixon	Matt
Dixon	Adele
Dixon	Laura
Dixon	Graham
Dixon	Caroline
Dobson	Angela
Dobson	Sally
Dodd	Helen
Dodkins	Jack
Doherty	Barbara
Dollery	Patricia
Dominguez	Belen
Donnelly	Teresa
Dorman	James
Dorrow	Paul
Doughty	Roy
Doughty	Carol
Downing	Terence
Downing	Carolyn
Dowsing	Julie
Dowsing	Alan
Doyle	Jack
Drake	Terry
Drew	Roger
Drummond	Laurence
Drury	William
Dudley	Martin
Dumont	George
Dungey	Anne
Dunlop	David
Dunlop	Robert
Dunne	Pamela
Dunthorne	Tabitha
Dunthorne	Bernadette
Dunthorne	Paul
Dunthorne	Theresa
Durbin	Andrea

Durbin	Fred
Durman	Lucy
Durman	Chris
Dyer	Larry
Dymock	Miles
Dymock	July
Dymock	Rosie
Dymock	Celeste
Dymock	Matilda
Eames	M
Eastwell	Harry
Eaton	Tracy
Eaton	Darren
EBELING	C.J
Eccles	Bernard
Eddington	Stephen
Edmonds	Sarah
Edwards	Yvonne Molly
Edwards	Barrington
Edwards	Edna
Edwards	Alexandra
Edwards	Barbara
Edwards	Robert
Edwards	Caroline
Edwards	Michael
Elkington	Dave
Elkington	Hazel
Ellis	Brian
Ellis	M A
Elms	Jean
Eldson	Andrew
Emanuel	Mia
Emanuel	Jake
Emanuel	Linda
Emanuel	Gareth
Emsley	Robert
English	Jeremy
English	Sheila
Epworth	Richard
Erichsen	Ingrid
Etherington	Frances
Etter	Peter
Evans	Melissa
Evans	Susan

Evans	Sarah
Evans	Adrian
Evans	Maureen
Evans	Mr & Mrs G
Evans	Elaine
Evetts	Maxine
Evetts	Mark
Eyett	Brian
Eyett	Linda
Fairchild	Shona
Falchi	D
Falco	Riccardo
Fallows	C
Farley	Derek
Farley	Susan
Farnham	John
Farrell	Simon
Farrell	Jennifer
Farrow	Susan
Faulkner	Kitty
Faulkner	Thomas
Faulkner	Christopher
Faux	Kenneth
Feather	Anne
Feely	Joe
Felstead	John
Felstead	Robert
Felstead	Angela
Felstead	June
Fenson	Pamela & Alan
Fenwicke-Clennell	Susie
Fife	Harry
Fifield	Vicki
Findlay	Dinah
Findlay	Rosanna
Findlay	L
Findlay	R W
Finlay	Peter
Fisher	Graham
Fison	Jonathan
Fitch	Pauline
Fitch	Rebecca
Fitzgerald	Suzanne
Fitzgerald	Sean

Flavin	Neil
Fletcher	Rachael
Flouty	Robert
Flowers	Pauline
Fooks	Fred
Fordham	Alan
Forrest	Doug
Fossey	Diane
Foster	Samantha
Foster	John
Foster	Nick
Foster-Butters	Bethany
Fowell	Robert
Fowell	Matthew
Fowell	Hannah
Fowell	Sally
Fowler	Robin
Fox	Julie
Fox	Katharine
Fox	Matthew
Francis	Rob
Francis	Karim
Francis	Natalie
Francklin	Henry
Frankilin	Charles
Franklin	Alice
Franklin	Charles
Free	Colin
Free	Jane
Freeman	Martyn
French	Adrienne
French	Ruth Caroline
French	R C
French	M L
Freshwater	Alison
Friccker	B
Friell	Kim
Frost	
Fryatt	
Fullbrook	Diana
Furze	A
Furze	Teresa
Gabriel	Robert
Gait	Richard

Galbraith	David
Gale	Carolyn
Gallantree	Ian
Gallantree	Brenda
Gallantree	Jane
Gallavan	Joy
Galvin	Tania
Galway	Charles
Galway	Geraldine
Gardner	Margaret
Gardner	Janice
Gardner	Andy
Gardner	Stephen
Garnett	Lucia
Garton	Neil
Garton	Rebecca
Garvin	Alexander
Garwood	Robeet
Garwood	Susan
Gates	Don
Gattie	Frankie
Gauld	Robert
Gaunt	Gillian
Gearing	Charlotte
Geddes	Richard
Geddes	Matthew
Gee	Gina
Geller	Ali
Geller	Rachel
George	Victoria
George	Patricia
George	Pamela
George	Helen
George	Penelope
Gerrard	Lizzie
Gething	Pamela
Gibbs	David
Gibbs	Linda
Gibbs	G.S.
Gibson	T
Gifford	Robert
Gifford	Fred
Gifford	Linda
Giles	Philip

Giles	Helen
Gill	Ian
Gill	Sharon
Gill	Elodie
Gillies	Chris
Gillmor	John
Gillmor	Karen
Gittings	Clare
Glanville	Michelle
Gleed	Laura
Goatley	R
Gobell	Mark
Gobell	Jayne
Goddard	Marie
Godding	Peter
Godding	J
Godfrey	Sven
Godfrey	Ros
Godfrey	Lynn
Godfrey	Ashley
Godlee	Carolyn
Goggin	David
Goldsmith	Frank Barrie
Goldsmith	Astrid
Goldsmith	Elizabeth
Goodall	K
Goodbody	Amanda
Goodbody	Chris
Goodey	Cheryl
Goodwin	Alexander
Goodwin	K
Goody	Terence
Gore	Thomas
Gough	Derek
Goy	Patricia
Grace	Jaimie
Grace	George
Graham	Winifred
Gramlick	Sally
Gramlick	Michael
Granneman	Michael
Grant	William
Graves	Karen
Graves	Richard

Gray	Willa
Gray	James
Gray	
Green	Angie
Green	Edward
Green	Steve
Green	Andy
Green	Paul
Greenbank	J
Greensted-Benech	Lindsey
Greenwell	Ava
Green-Wodhams	Sofia
Greenwood	Alex
Gregory	Andy
Griffiths	Nigel
Griffiths	Jane
Griffiths	Victoria
Grimwood	Melvyn
Gristwood	Julia
Grocott	Doreen
Growden	J
Grufik	Vojtech
Grufikova	Lubka
Guard	Howard
Gulrajani	Ramesh
Gurry	G
Hague	Toby
Haigh	Jason
Haimes	Paul
Haire	Katie
Hale	Ian
Hale	Betty
Halford	Roger
Hall	Mike
Hall	Chris
Hall	Scarlett
Hall	David
Hall	Phillipa
Hallett	Mark
Hamilton	Thomas
Hammersley	Joyce
Hammond	Shaun
Hampton	Patricia
Hampton	Alan

Hanles	Nick
Hannaford	Patricia
Happe	Ian
Haq	Imran
Hardie	Mark
Harding	Paula
Harding	Frances & Bill
Hardy	S
Hargrave	Steven
Hargrave	Jackie
Hargrave	Luke
Hargrave	Amy
Harley	Robert
Harman	David
Harrington	Unity
Harris	James
Harris	Clive
Harris	Andrew
Harris	Ben
Harris	Pamela
Harrison	Karen
Harrison	Edward
Harrison	Kit
Harrison	Fiona
Harrison	Tim
Harrison	P A
Harrison	Karen
Hart	Sally
Hartwig	M-Corinna
Hassell	Nicholas
Hatch	Allan
Hatch	Claire
Hatch	David
Hatch	Stephen
Hawker	Janet
Hawkins	Lisa
Hawson	Margaret
Hay	Frances
Hayes	Lisa
Hayman	Sarah
Hayward	Jackie
Head	Sandra
Healy	Rita
Healy-Birt	Eleanor

Hearne	Sally
Heighway	John
Heighway	Sarah
Heilpern Brown	Judy
Helme	James
Helme	Sally
Hemingway	James
Hemingway	Laura
Hemingway	Robert
Hemmings	Stephanie
Henderson	Rachelle
Henderson	Archie
Henderson	Charlotte
Henry	Thomas
Henry	Maria
Heraud	Lynne
Herod	Julie
Herod	Charlotte
Herod	Ben
Herod	Victoria
Hewett	Brenda
Hewett	Philip
Hewitt	Philip
Hibbs	Simon
Hibert	Jean
Hickling	
Hicks	Debra
Higgins	Jeremy
Higgins	Matt
High	Sarah
Highstead	Mike
Higson	John
Hiles	Lorraine
Hill	Ian
Hill	Sally
Hill	Tim
Hill	Frances
Hill	Julian
Hill	Justin
Hill	Samuel
Hill	Ann
Hill	Susanna
Hill	Marian
Hill	J W

Hill	Paul
Hillman	Michael
Himsworth	Vivienne
Himsworth	Malcolm
Himsworth	Matt
Hindley	J
Hir-Hosseini	M.
Hitch	R
Hitching	V
Hoare	Nigel
Hoare	Natalie
Hodges	Nik
Hodgkinson	Paul
Hodson	Richard
Hogan	Jenny
Hogg	Nigel
Holbrook	Elizabeth
Holbrook	Keith
Holden	Alison
Holder	Emma
Hole	Sarah
Hole	Benjamin
Holland	Davina
Holland-Hibbert	Issy
Holland-Hibbert	Henry
Holliman	Alan
Hollis	John
Hollylee	Jean
Hollylee	Roger
Honeywood	Jane
Honeywood	Lucy-Jane
Hook	Anthony
Hope	Olivia
Hopkins	James
Hopkinson	Gordon
Horlock	Deborah S
Hossack	Ruby
Hough	Peter
Houghton	Hugh
Houston	Alexander
How	Anne
Howard	Gary
Howard	Megan
Howard	Catharine

Howard	Robin
Howarth	M
Howarth	Toni
Howells	Dillon
Howes	J
Hubbard	Ellie
Hudson	Ian
Hudson	Toby
Hudson Carty	Terri
Huggett	Richard
Hughes	Simon
Hughes	Helen
Hughes	Louise
Hughes	Margaret
Hughes	Alan
Hughes	Helen
Hughes	Darren
Humphrey	Janette
Humphreys	David
Humphries	Joanne
Hunt	David
Hunt	Laura
Hunter	Jan
Huntley	John
Huntley	Kenneth
Hurley	Liam
Hurley	Cath
Hurst	Daniel
Hutchings	Lois
Hutchings	Nicola
Hutchinson	Jennifer
Hutchinson	David
Hutchinson	Jacqueline
Hutchinson	
Hyam	Stephen
Hyde	Claire
Hyde	Peter
Hyde	Janice
Hyde	Ashleigh
Hyde	Shelley
Hydei	Ashleigh
Hymns	Lesley
Iles	Adrian
Iliffe	John

Iliffe	Veronic
Iliffe-Munns	June
Imroth	Rosemary
Inman	Anna
Inman	Averil
Inwood	Carl
Ireland	John
Isingor	Ayse
Ives	Deborah
Ives	Sebastian
Izzard	P
Jaafar	Mohammad
Jack	Martin
Jackson	Cherry
Jackson	David
Jackson	Mary
Jackson	Chris
Jackson	C C
James	Trevor
James	Emily
James	D
Jarratt	Christine
Jarvis	Sylvia
Jarvis	Robert
Jelf	Carole
Jenner	Rosemary
Jenkins	Carole
Jenkins	Martha
Jenkins	Danny
Jenkins	Michael
Jenkins	J
Jennings	Ashley
Joghee	Clare
John	Paul
Johnson	Richard
Johnson	Peter
Johnson	Victoria
Johnson	Claire
Johnson	Susan
Johnson	David
Johnson	J
Johnson	A
Johnson	Val
Johnston	Angela

Jolley	Catherine
Jolley	David
Jolly	Kirsten
Jones	Simon
Jones	Carol
Jones	Corin
Jones	Laura
Jones	Nicola
Jones	Simon
Jones	Celia
Jones	Cobie
Jones	Michael
Jones	Sarah
Jones	James
Jordan	Neil
Jordan	Brenda
Jordan	Keith
Jordan	Susan
Jordan	Jade
Jordan	Hattie
Jordan	Barney
Jordan	Sarah
Jowsey	Amy
Judd	Emma
Judd	Christopher
Kappaka-Benzing	Michalitsa
Karashan	Deana
Karn	Marcus
Karn	Stephen
Karsten	Peter
Karsten	Caroline
Kathy	
Keeley Foster	Keeley
Kellett	Hugh
Kellett	Sarah
Kellett	Jamie
Kelly	Madeline
Kelly	Humphrey
Kelsey	Peter
Kelsey	Lauren
Kelsey	Gavin
Kendall	Sarah
Kendall	Simon
Kendrick	Deborah

Kennard	Suzanne
Kennedy	Joan
Kenworthy	Stanley
Kenworthy	Shirley
Kenyon	Lesley
Keogh	Michael
Keogh	Joanne
Key	Charles
Key	Lisa
key	richard
Key	Rodney
Key	Grace
Key	Charlie
Khan	Sadiqua
Kidman	Karen
Kinder	Oscar
King	Joanna
King	Valerie
King	Nicola
King	William
King	Sophie
King	J
Kinloch	Ian
Kinsman	Heather
Kitchen	Sheila
Kite	L
Klaskala	O
Knatchbull	Phoebe
Knight	Ritchie
Knight	Beth
Knight	Lauren
Knight	Frankie
Knight	Gracie
Knight	Harry
Knott	Tom
Knowles	Sarah
Kock De Grooeynd	Tamara
Konn	Kate
Kyriakou	Andrew
Laing	Alistair
Lake	V A
Lambert	Nicholas
Lambert	Fiona
Lambert	Rosanna

Lambert	Angus
Lance	Henrietta
Landman	Benjamin
Landon	Susan E
Lane	Lucas
Lane	Jeffrey
Langman	Robert
Langman	Pam
Lanham	Steve
Lankester	Georgina
Latham	Peter
Laurie	Alexandra
Laurie	Sarah
Laurie	Andrew
Laurie	Louise
Laurie	Benjamin
Laurie	Henry
Laurie	Helen
Laurie	Claire
LaVelle	Jacqueline
LaVelle	Luke
Lavergne	Lara
Laverick	Sophie
Law	Jacqueline
Law	Nicholas
Law	Christine
Law	Mc
Lawrance	Edwina
Lawson-Williams	Nick
Lazarus	Barrie
Lazarus	Barbara
Leach	Lynda
Leaford	Mike
Learmonth	Jo
Lee	Andrew
Lee	Patricia
Lee	Roland
Leese	Tara
Lefever	Andrew
Legon	Lieann
Lemay	Brian
Leslie	Christine
Leslie	Barry
Lestet	Scott

Lever	Mark
Lewingdon	H.
Lewington	Martyn
Lewington	Sarah
Lewis	Corinne
Lewis	Denise
Lidster	Lara
Lilly	Sarah
Lilly	Andrew
Lilly	Andrew
Line	Lynn
LIne	David
Linehan	Molly
Littlebury	Jackie
Littleton	David and Tina
Livermore	James
Liyvinor	Sergei
Lloyd	Freddie
Lloyd	Laura
Lloyd	Shaun
Lloyd	Sarah
Lloyd	Richard
Lloyd	Sonia
Lock	Sophie Clare
Lock	Iain
Locke	Howard
Lockley	Bobbie
Lodge	Michael
Lodge	Marianne
Logan	Robert
Lord	Yvette
Lord	Helen
Lord	John
Lovett	Helena
Lowe	Brenda
Lowe	Stephen
Lucas	Peter
Luck	Peter
Luck	Frances
Luck	David
Luckie	Doreen
Lucking	Sue
Luedtke	Annette
Lukey	David

Lukey	Pauline
Lumb	David
Lundy	Karly
Lunn	Charlie
Lutyens	Mark
Lynch	Lewis
Lyons	Freddie
Mabey	Matthew
Mabey	Rachel
MacArthur	Jamie
MacArthur	Claire
Macdonald Johnston	Tamsin
Macdonald Johnston	Alistair
MacDonald-Milner	George
Macgilchrist	R
MacGilchrist	Barbara
Macintosh	Belinda
MacKenzie	Wendy
Mackenzie	Don
Mackenzie	Estelle
Mackey	Shelagh
Maclachlan	Karen
Maclachlan	William
Macmillan	Ian
Macpherson	S.R.
MacRae	Jamie
Magill	Cosima
Maher	Paul
Mainwaring-Burton	Constance
Maisey	Ailis
Makinson	Ian
Maleary	C
Maleary	S
Malone	Alison
Malpass	Sarah
Maltby	Alice
Manning	Mary
Manning	Dennis
Mansfield	Alison
Manzar	Aziz
Manzar	Beverley
Marendaz	George
Markham Harris	Rachel

Marks	Wendy
Marlow	Richard
Marrin	Pippa
Marris	Clare
Marris	David
Marster	Colin
Marsters	Annie
Martin	Sheila
Martin	Lucy
Martin	Anthony
Martin Smith	Evy
Mascall	Steve
Mascall	Wendy
Mascall	Margaret
Maskell	D
Maslinski	Michael
Mason	Leann
Matthews	Beryl
Matthews	Bradley
Matthews	Jack
Matthews	K
Maudling	
Maule	Julian
Maule	Fleur
May	Peter
May	Carol
Mayers	Nick
Mayeres	Louis
Maynard	Christopher
Mayo	Lucia
McAdam	Sandra
McAlan	John Paul
Mcalpin	Layla
McCann	Stephen
McCann	Colin
McClaymar	Melissa
McDonald	David
McDonald	Sharon
McDonald	Ken
McDonald	Janice
Mcdonald	Claire
Mcdonald	Neil
McFrederick	Clodagh
McFrederick	Malcolm

McFrederick	Helen
McFrederick	Willa
McGee	Denise
McGill	Joanna
McGreur	Karina
Mckelvey	Charlie
Mckenna	Victoria
McKinnon	John
McKinnon	Jill
McNab	John
McNally	Bruce
Mcnamee	Susan
McNamee	Scott
McPartland	Stephen
Meadows	James
Meadows	Bronwyn
Meehan	Diane
Meehan	Cathal
Meehan	Caroline
Meek	Isabella
Meek	J
Mellors	Steve
Melluish	Christopher
Melville	Katharine
Melville	Miranda
Merod	Alan
Metcalf	Jan
Michael	Maria
Michael	George
Micheli	Francesca
Middleditch	Kim
Middleditch	Tina
Middleton	Christopher
Milburn	Dominic
Miles	Pierre
Miles	Kevin
Miley	Sarah
Millard	Ray
Millard	Chris
Millard	Kim
Miller	Nigel
Mills	Bobbie
Milne	Sandra
Milne	Andrew

Milton	Silvana
Minkey	Terence
Minkey	Lisa
Minkey	Abigail
Minkey	Alexander
Mintram-Mason	Susan
Mitchell	Sharon
Moloney	Tracy
Moncur	Jennifer
Monk	J
Monroe	Ronald
Montgomerie	Lorna
Moore	Robert
Moore	Ann
Moore	Tina
Moore	Charles
Moore	Amy
Moore	Richard
Moore	Joyce
Moore	Edward
Moore	Teresa
Moore	Terry
Moran	Caroline
Morgan	Keith
Morgan	Suzanne
Morgan	Ellen
Morgan	S
Morgan-Giles	August
Morris	Kathleen
Morris	Mark
Morris	Susanna
Morris	Blaise
Morris	Jemima
Morris	Philip
Morris	Melanie
Morris	Claire
Morris	Paul
Morris	Kenneth
Morrison	Robert
Morrison	Brenda
Morrison-Barber	Lucy
Morton	Basih
Morton	P
Moseley	Jane

Moss	Marion
Moss	Jacqueline
Mostyn	Lucy
Mott	Ken
Moxey	Tricia
Moynan	Georgina
Mullender	Keith
Mullender	Pauline
Mullins	Gillian
Mullins	Edward
Mullins	Lee
Mumford	Jill
Munday	Rodney
Munday	Richard
Munn	Richard
Munns	Steven
Munro	Brian
Munro	Gordon
Munro	Bridget
Munslow	Steve
Munslow	Beryl
Murphy	Alan
Murray	Stephen
Murray	Leeanne
Myland	Lynn
Nairn	David
Napier	Phoebe
Nash	Helena
Nassau	Julie
Nathan	Jane
Nathan	William
Nathan	Jane
Natt	Peter
Neal	Kathie
Neall	Patrick
Necalpin	Jon Paul
Needham	Dave
Needham	
Neesam	Darren
Neeson	Jamie
Nelmes	Judith
Nelson	Tom
Neuhaus	Anne
Nevill	P C

Newberry	A
Newell	Keith
Newhook	Mark
Newman	Mike
Newman	Richard
Newman	Alan
Newman	Lorraine
Newman	Gary
Newman	Karen
Newman	Katy
Newmarch	Amanda
Newton	Hedley
Newton	Kay
Newton	Virginia
Nichol	Lorraine
Nichol	Brian
Nicholas	Heather
Nicholls	Colin
Nicholls	Kevin
Nicholson	Diana
Nicklin	Edward
Nickson	Graham
Nightingale	Kaye
Noakes	Edward
Noakes	Sandra
Noonan	Kirsty
Norden	Anthony
Norfolk	Harry
Norfolk	Chase
Norfolk	Chris
Norfolk	Jade
Norford	Zoe
Norgan	R F
Norman	Peter
Norman	Caroline
Norris	Gwen
Notley	Sue
Notley	Wesley
O Maskell	M
O.Shea	Franil
Oakley	Gina
O'Boyle	Ciaran
O'Brien	Suzanne
O'Brien	Chris

O'Brien	Therese
O'Brien	Michael
O'Brien	Michael
O'Brien	Laura
O'Connor	Anthony
O'Connor	Patricia
O'Dowd	Gerry
O'Dowd	Shaun
O'Dowd	Glenda
Offord	Phil
O'Hare	Dan
Oldman	Sharon
O'Leary	Gary
O'Leary	Gary
O'Leary	Jacqueline
Oliver	Stella
Oliver	Keith
O'Neil	Bill
Ordon	Jan
O'Reilly	George
O'Reilly	Louise
O'Reily	Hugh
O'Rourke	Andrew
Orsborn	Jane
Orson	Chris
Orson	Mark
Orson	Judy
Orton	Paula
Osborne	Jackie
Osborne	Gabrielle
Osborne	Sharon
Osgood	Paul and Nadia
Osgood	Nad
O'shea	Matthew
O'Shea	Margaret
O'Shea	Rebecca
Osterley	Karen
Owen	Pauline
Owen	Derek
Owen	Kelly
Owen	Colin
Oxenbridge	Julia
P. Castree	Brenda
Page	Carole

Page	Joan
Palmer	Jessica
Palmer	Andrew
Palmer	Graham
Palmer	Karen
Palmer	Lynn
Papworth	R
Parfett	Doug
Parker	Nicky
Parker	Emily-Harriet
Parkes	Gemma
Parkinson	Nicholas
Parrott	Malcolm
Parrott	John
Parrott	Caroline
Parrott	Ann
Parry	Matthew
Parsons	Belinda
Parsons	Olivia
Paskin Orr	Angus
Passfield	Andrew
Patterson	Caroline
Patterson	Callum
Pattie	Douglas
Pawle	George
Payling	Julie
Payne	Carrie
Payne	Tom
Payne	John
Payne	Yvonne
Payne	Sarah
Payne	Michael E
Payne	Sophie
Payne	Craig
Payne	John
Peachey	Julia
Peacock	C W
Pearce	Richard
Pearce	Stephanie
Pearce	Livia Elise
Pearce	Julie
Pearson	John
Pearson-Rose	Taryn
Peck	Marguerite

Peeters	Tups
Pegram	Teresa
Pegram	Michael
Pegram	P
Penney	Ginny
Pennington	Julian
Peplow	Denise
Perkin	Gill
Perks	Elliott
Perry	Dan
Petherick	Ann
Phillipps	Sarah
Phillips	John
Phillips	Alexander
Pick	Jean
Pickard	Charlie
Pickard	June
Piggott	Nigel
Pikett	John
Pilkington	Jonathan
Pilkington	Victoria
Pinches	Stephen
Pincombe	Gill
Pinfold	Jon
Pinfold	Janet
Pink	John
Pinney	Adrian
Pinney & Bates	Adrian & Lynn
Pipe	Warwick
Pipe	Nicola
Pipe	Graham
Pitts	Keith
Pkins	Julian
Platt	Paul
Playdell-Bouverie	Richard
Pole	Elizabeth
Ponting	Lee
Ponting	Michelle
Ponting	Mark
Ponting	Melanie
Pool	Alexander Jonathan
Poole	Chris
Poole	Jean
Poolgy	Chris

Portch	Luke
Posner	Kyle
Poullais	Daniel
Poulton	Emma
Povell	Edward
Preshous	Helen
Preshous	Steven
Preston	Gary
Preston	Lynne
Pribul	Timothy
Price	
Prizeman	
Probert	Rebecca
Procter	Rebecca
Proseve	Jo
Pullin	Melanie
Pullin	Max
Pullin	Sophie
Purdy	Alison
Quantrill	J S
Ramsay	Katherine
Rankin	Max
Rankin	Anna
Ransom	Jo
Raudle	D
Rawson	Victor
Rayner	David
Read	Mary
Read	John
Read	Sally
Read	Richard
Reed	Ralph
Reed	Cheryl
Reed	Peter
Reed	Bruce
Reed	P E
Reeks	Nickolas
Rees	John
Reid	Martyn
Reid	Teresa
Reid	Christine
Reynolds	Margaret
Rhodes	Rosamund
Rhodes	Fiona

Richards	Bruce
Richards	Warren
Richards	Stephen
Richards	D
Richardson	Clive
Richardson	Fraser
Richardson	Tania
Richardson	Suzy
Richardson	Ed
Riches	Alan
Richmond	Ann
Riddle	Paul
RIDER	JOHN
Ridge	Catherine
Riggs	Simon
Ripsher	Michael
Ripsher	Natalia
Risby	Dorothy
RISBY	CLIVE
Rist	Michele
Rist	Ken
Roach	Louise
Robarts	Edwina
Roberts	Lee
Roberts	Miles
Roberts	Sally
Robertson	John
Robertson	Archie
Robertson	Francesca
Robinette	Joy
Robinette	David
Robinette	Katie
Robinson	Adrian
Robinson	Charles
Robinson	Oliver
Robson	Irene
Robson	Stephanie
Roche	Tracy
Roche	Michael
Rogers	Claudia
Rogers	Simon
Rogers	M H
Rome	Bob
Roper	Elizabeth

Rose	Paul
Rose	Douglas
Ross	Michael
Ross	M
Ross-Collins	Michael
Round	Emily
Roupell	Sasha
Roupell	Harriet
Rous	Maha
Rowe	Felicity
Rowe	Nicholas
Rowe	Anne
Rowland	Stephen
Roxburgh	Florence
Roxburgh	Malcolm
Roxburgh	Max
Royle	David
Rupeiks	Rene
Russell	Carol
Ruszkowski	Danielle
Ryan	Sean
Saary	Mihaly
Saban	Kim
Sadler	Elaine
Salmons	Joesph
Saltau	Polly
Sampson	Charles
Samuel	Sandra
Samuelson	Charlie
Samuelson	Susie
Sanders	Kit
Sanderson	Frank
Sanderson	Danny
Sanderson	C
Sanderson	Calvin
Sanderson	Alan
Sandilands	Alice
Sangster	Andrew
Sargent	Robert
Saunston	Helen
Saw	Ciara
Sawer	Victoria
Sayer	Gillian
Schillaci	Sabrina

Schlenker	Lorna
Schuyler	Emily
Scolar	Paul
Scorah	Martin
Scott	Julia
Scott-Gatty	Jack
Seaman	Jean-Elaine
Seaman	Elaine
Seaman	Subreen
Searle	Dawn
Searle	Paul
Sears	C
Sears	Mark
Sefton	Otilie
Seller	Angela
Serra	Jack
Sexton	Janet
Shadbolt	GW
Shadbolt	Amy
Sharp	Daniel
Sharp	Denis
Sharp	Catherine
Sharpe	Jeff
Shaw	Jane
Shaw	Justin
Shaw	Kim
Shaw	Nigel
Shaw	Natalie
Shaw	Michael
Shaw	Sophie
Shaw Stewart	Lachlan
Shepherd-Barron	Sam
Sheraidah	Ghassan
Shields	T
Shirley	Roy
Shirley	James
Shirley	Henry
Shirley Dodgshon	Frances
Shorrock	Carol
Shrubb	Peter
Shutes	Richard
Siddons	Annabel
Sidiropoulou	Sofia
Siegmund	Ben

Simmonds	Lisa
Simons	Sheila
Simpson	Penny
Simpson	Michelle
Simpson	Xavier
Sinclair	Archie
Sirkett	Ella
Skinner	Stephen
Skinner	Jane Mary
Skinner	Jane
Slater	Paul
Sleigh	James
Sleigh	Margaret
Sleigh	Tom
Sleight	Hazel
Sly	John
Smalley	David
Smalley	Bryan
Smart	R
Smith	James
Smith	Janet
Smith	David
Smith	Paul
Smith	Sue
Smith	Amanda
Smith	J D R
Smith	Frances
Smith	Dorothy
Smith	Diane
Smith	Emily
Smith	Christine
Smith	N
Smith	Stewart
Smith	Hugh
Smith	John
Smith	Deborah
Smith	Kath
Smith	Mark
Smith	Maggie
Smith	Penny
Smith	Peter
Smith	Thomas
SMITH	
Smith	Alex

Smith	Arabella
Smith	Dorothy
Smith	Jennifer
Smith	Louise
Smith	Brian
Smith	J
Snook	Christine
Sofroniou	Jeffrey
Soley	Vera
Soltau	Julian
Soltau	Martin
Soltau	Jennifer
Sowden	Charlotte
Spalding	
Spall	Janet
Sparks	Raymond
Spence	Kathryn
Spencer	Jacqueline
Spenner	Andrew
Spinks	Robert
Spooner	Ian
Spooner	Neil
Sporborg	Rachel
Squires	Jenn
Squires	Adam
St John	Sandra
St Pier	Keith
Stafford	Jan
Stallman	Nicholas
Stanley	Kelsey
Staples	John
Stapleton	M
Statham	Jenny
Staughton	Joanna
Staunton	Chris
Steele	William
Stephens	S
Stephenson	Paul
Stergios	George
Stevens	Valerie
Stevens	Paul
Stevens	C
Stevenson	Paul
Stewart	Corrine

Stewart	Douglas
Stewart	Donald
Stewart	Kevin
Stewart	Robert
Stewart	Julie
Stickler	Tony
Stimpson	Robert
Stirling	Susan
Stocker	Janet
Stott	Steve
Straker	Lucy
Stratton	Helen
Street	Julie & Paul
Stretch	Paul
Strickland	Katie
Stringer	William
Strongitharm	Nigel & Sarah
Stubbs	Jennifer
Stubbs	Chris
Sturgeon	Victoria
Stuttard	Tom
Sukroo	James
Suleyman	Salahi
Sullivan	Christian
Sullivan	Dominic
Summerfield	Sharon
Summerfield	Lee
Supiler	Wendy
Surrige	David
Sutherland	Joshua
Sweeney	Michael
Symes-Thompson	Lou
Sypula	Stephen
Taberer	Annette
Tallent	Kevin
Tamiazzo	Elizabeth
Tarrant	Joe
Tasker	Maria
Taverner	Kelsey
Taylor	Jill
Taylor	Dean
Taylor	Nicholas
Taylor	Alison
Taylor	Benjamin

Taylor	Phil
Taylor	Gavin
Taylor	Nicola
Taylor	Philip
Taylor	Charlotte
Taylor	Jo
Taylor	Briary
Tee	Jeff
Thacktray	Liam
Thame	Brian
Thame	Hazel
Thomas	Mark
Thomas	Colin
Thomas	Ann
Thomas	John David
Thomas	Jennifer
Thomas	Brian
Thomas	Gary
Thompson	Paula
Thompson	Ray
Thompson	Glen
Thompson	Alice
Thomson	Alison
Thornton	Emily
Thornton	Ian
Thornton	Pamela
Thorogood	Alison
Thorogood	Ron
Tierney	Judie
Tilley	Shirley
Tilley	Colin
Tilley	Maxine
Tingling	Lynda
Tipping	S
Tirelli	Shirley
Todd	Laura
Toll	Peter
Toll	Robert
Toll	Daphne
Toller	Katharine
Tomlinson	T C
Toomey	Elizabeth
Towse	Carole
Tracey-Micheli	Veronica

Traer	Reginald
Traer	Sandra
Trenchard	Fiona
Trenchard	Hugh
Troll	Clifford
Troughton	Bertie
Trower	Edward
Trower	Hugo
Trower	Antonia
Trower	Gini
Trower	Tom
Trower	Jonathan
Trower	Robert
Trower	William
Trower	Archie
Trower	Mary
Trower	Hamish
Trower	Helen
Trower	Fergus
Trower	Emily
Trower	Anthony Richard
Trower	Charlotte
Trower	Arabella
Trower	Hector
Trower	Rosie
Trower	Cassia
Trower	Christopher
Tsangarides	Stephanie
Tsangarides	Savvas
Tsangarides	Sally-Anne
Tsangarides	Andreas
Tubb	James
Tucker	Brenda
Tucker	Phil
Tulloch	June
Tulloch	Ian
Turner	J C S
Turner	Andrew
Turner	Caroline
Twigg	Martin
Twigg	Mary
Twilly	Ben
Twiston-Davies	Sophie
Twiston-Davies	Thomas

Twitchett	Joan
Tyler	Ian
Tyler & Shannon	Tyler & Shannon
Tysome	Katie
Tysome	Mark
Umit	Filiz
Van Baars	G
Van de Bilt	Theo
van de Bilt	Simeone
Van de Bilt	Joe
Vanner	A
Vanner	Anne
Vaughan	Dawn
Vaughan	Martin
Vaughan	Susan
Vaughan	William
Vaughan	Simon
Veale	Richard
Veasey	Ed
Veasey	Shirley
Verulam	John
Vestey	Georgina
Vestey	Tessa
Vickers	Alan
Vickers	Michael
Vickers	Adrian
Vineall	Christine
Vineall	Chris
Vineall	Michael
Viwer	Michelle
Von Westenholz	Piers
Von Westenholz	Frederick
Vowles	David & Margaret
Vullo	Jennifer
Vullo	Vincenzo
Wade	Frank
Wade-Bylis	Patricia
Wagland	Gill
Wair	Stephen
Wair	James
Walford	Judy
Walford	Martin
Walkden	Christine
Walker	Ian

Walker	Danielle
Walker	Jonathan
Walker	Kelly
Wall	Mark
Wall	Enna
Wallace	Lorraine
Wallace	David
Wallace	Alister
Wallace	James
Wallace	Pam
Waller	Samantha
Wallersteiner	Imogen
Walsh	Kieran
Walsh	Rosalino
Walsh	Sarah
Walters	Peter
Walters	Jill
Ward	Lucy
Warlock	Jonathan
Warner	Jill
Warr	Tracy
Waters	Richard
Watkinson	Mark
Watson	Linda
Watson	Paul
Watson	Colin
Watts	Hannah
Waugh	Elizabeth
Waugh	Caroline
Webb	Gary
Webb	Charlie
Webb	Daniella
Webb	Elizabeth
Webster	S
Webster	C
Weeks	Hugh
Weeks	Giuseppina
Weir	Mayer
Welch	Bill
Welch	Liz
Wells	Jo
West	Tania
West	Raymond
Westell	Veronica

Westfallen	Joanne
Westmacott	Katherine
Wharmby	Malcolm
Wharmby	Helen
Wheeler	Pippa
Whetsone	Tom
Whitbread	Valerie
Whitby	Lauren
White	Tim
White	Sandra
White	Andy
White	Brian
White	Rob
White	Ian
Whitehead	Magdalena
Whitehead	Ben
Wigan	Sophie
Wiggett	John
Wightwick	Robert
Wightwick	Sarah
Wilkes	Sally
Wilkinson	Mary
Wilkinson	Philip
Wilkinson	Rosalind
Williams	Anthony
Williams	Shelley
Williams	Chris
Williams	Oliver
Williams	Grace
Williams	S
Williams	Penny
Williams	James
Willis	Martin
Wills	Kathryn
Wilmot	Dawn
Wilson	Kevin
Wilson	India
Wilson	Ricky
Wilson	Rebecca
Wilson	Johanna
Wilson	David
Wilson	Lesley

Wiltshire	Jo
Winter	Gary
Winter	Jenna
Winter	Robert
Wood	Karen
Wood	Robert
Wood	John
Wood	Angela
Wood	Valerie
Woodall	Rosemary
Woodget	Jennifer
Woodhouse	Charles
Woodhouse	Philip
Woodhouse	Sam
Woodhouse	George
Wood-Kaczmar	Barbara
Woods	Kevin
Woods	Alistair
Woolcombe	Rosemary
Woolcombe	Melanie
Worby	Beryl
Worby	Robert
Worby	Derrick
Workman	Daniel
Worrall	J M
Wray	Nigel
Wren	Maureen
Wren	Lee
Wright	Johanna
Wright	Lucy
Wright	Debbie
Wurr	R
Wybrew	I
Yarrow	Sara
Yates	Joanne
Yeates	Marcia
Young	Janis
Young	Karen
Young	Michael
Zarebska	Aleksandra
Zarebski	Blazej
Zimareva	Natalia

In addition to the above, a petition containing 1,929 signatures was received in respect of Bishop's Stortford South (Policy BISH5).

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
1.1 What is the District Plan?	
1.1	<u>Objection</u> <ol style="list-style-type: none"> 1. The Plan is far too long and policies that repeat the content of the NPPF should be deleted. 2. The consultation process is inadequate with a lack of information and over-complicated questions.
1.3 Evidence Base	
1.3	<u>Objection</u> <ol style="list-style-type: none"> 1. The evidence base is not sufficient. 2. The housing need figure is based on extrapolating previous trends. It would be more helpful to try to draw people away from areas that have experienced high growth previously. 3. The Sustainability Appraisal only assesses eight general distribution options and doesn't provide a detailed sustainability assessment of each proposed site. 4. The Sustainability Appraisal does not meet the requirements of the European Directive on SEA. 5. Evidence concerning transport modelling has not been published. 6. The Village Hierarchy Study fails to recognise that some Group 2 villages are much more sustainable than others. 7. The methodology used to assess Green Belt is flawed as it does not differentiate between individual sites.
1.3.2	<u>Objection</u> <ol style="list-style-type: none"> 1. The implications of Brexit have not been considered.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
1.4 Duty to Co-operate and Strategic Planning	
1.4	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The Council has failed in its Duty to Co-operate with North Herts Council in that insufficient consideration has been given to a new settlement on the A10 within either administrative area. 2. The Council has failed to consult properly with its housing market area partners in order to ensure that the SHMA is robust and fit for purpose. 3. There is little evidence that the Duty to Co-operate has been met. 4. There is no evidence with regards to how the Council has co-operated with Welwyn Hatfield Council, particularly with regards to how the development to the east of Welwyn will meet respective housing needs and impacts on Panshanger Park. 5. The Council has failed to consult the Hertfordshire Gardens Trust, a statutory consultee.
1.5 Sustainable Development	
1.5	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. There is no consideration of health issues, particularly hospital capacity.
INT1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for policy. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Part III of the policy should be deleted as the Council will never have a 5 year supply of land due to developers releasing allocated land slowly due to economic reasons.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
2.3 Key Issues and Challenges	
2.3.1	<u>Support</u> 1. Support for the identified key issues and challenges.
2.3.2	<u>Objection</u> 1. The key issues and challenges should also refer to pollution.
2.3.6	<u>Objection</u> 1. Other modes of transport must be considered and the Rights of Way Improvement plan should be considered for all non-motorised users.
2.4 Vision	
2.4	<u>Support</u> 1. Support for vision. <u>Objection</u> 1. There should be reference to agriculture, farming and rural character. 2. There should be reference to improving health. 3. Objection to point 7 in that it requires loss of Green Belt. 4. Point 7 just lists where development will go, it isn't a vision. 5. Point 7 should be expanded to refer to adjoining communities in neighbouring districts. 6. The vision should refer to maximising the use of brownfield sites. 7. No public consultation has taken place on the proposed development to the east of Stevenage. 8. Reference to meeting the full OAN and associated jobs should be included. 9. Reference to the LSCC as a key economic driver should be included.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
2.5 Strategic Objectives	
2.5	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for strategic objectives. <p><u>Objection</u></p> <ol style="list-style-type: none"> 2. There is no reference to health in the strategic objectives. 3. Objective 1 should refer to adapting to climate change as well as mitigation. 4. Insert an objective to protect the Green Belt. 5. Insert an objective to meet full objectively assessed housing needs.
2.6 London Stansted Cambridge Corridor (LSCC) Vision	
2.6	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for vision. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The vision is unsound as it does not refer to environmental and planning policy constraints. 2. The vision should not be limited to the Harlow/Bishop's Stortford area as investment in the A120 and A414 will bring adjacent locations such as Ware into play. 3. Money towards rail improvements should be re-directed to a Standon bypass, dualling the A602 and the A10 north of Puckeridge. 4. There should be a stronger reference to housing.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
3.1 Introduction	
3.1	<u>Objection</u> 1. The Council has identified the development strategy and then made the evidence fit to support it.
3.1.2	<u>Objection</u> 1. There are three mutually dependent elements of sustainability which must be achieved rather than just 'mitigated'.
3.2 Level of Growth	
3.2	<u>Objection</u> 1. The Plan does not take account of London's housing needs.
3.2.1	<u>Objection</u> 1. Existing infrastructure is not sufficient to support the level of development identified.
3.2.2	<u>Objection</u> 1. The housing target should take account of the need to avoid breaching environmental/policy constraints – objectively assessed housing need does not need to be met in full. 2. The existing under provision in infrastructure should be considered.
3.2.4	<u>Objection</u> 1. The amount windfall completions likely to take place over the plan period have been underestimated. 2. The Plan does not meet the needs arising from the 2014 household projections which were published in July 2016. 3. More information is required on how the level of housing need across the Housing Market Area has been disaggregated among the four authorities.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
3.2.6	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The housing need figure does not include the projected increase in the institutional population. There is a need for approximately 530 C2 bed spaces.
3.2.7	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. If the objectively assessed housing need is calculated over the Housing Market Area then joint or aligned plans should have been prepared. 2. The Local Plans of Housing Market Area partners don't use the same time horizon. 3. A 'bottom up' approach to calculating housing need should be used rather than the SHMA. This approach would seek to meet the housing needs of local people first. 4. The SHMA is based on past population trends which have been projected forward. This inhibits any change in future growth. 5. The SHMA does not take into account the fact that the U.K is leaving the European Union. 6. London will be providing significantly more affordable housing which may reduce migration to areas such as East Herts. 7. Ryanair will be focusing expansion away from Stansted Airport which may reduce demand for housing. 8. A 20% uplift in the SHMA, to take account of affordability issues, is too high. 9. The period 2001-2011 catered for mass expansion at Stansted, these trends should therefore not be projected forward. 10. Unclear why the East of England Model issued in August 2016 has not been considered. This model shows much lower growth figures. 11. The migration figures which form part of the SHMA are too low. 12. The SHMA does not address market signals which suggest a further uplift is required, such as high rental levels and high house prices.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	13.It is not clear from the SHMA how the housing need figure has been identified.
3.2.8	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The annual increase in employment shown in the SHMA is excessive. 2. There isn't a clear explanation within the SHMA how the growth of 10,000 extra jobs at Stansted Airport has impacted on housing need. 3. A figure of 5,000 jobs at Stansted Airport would be more realistic. This would reduce housing need.
3.2.9	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for provision of 11 hectares of employment land. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The release of Green Belt land for employment purposes at Bishop's Stortford South and North and East of Ware should be avoided. 2. The list should be amended to include employment land as part of the East of Welwyn Garden City site. 3. Providing additional employment land at Mead Lane, Hertford is not in accordance with the Mead Lane Urban Design Framework.
DPS1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. The Council has taken a pragmatic view in terms of meeting the housing need identified in the SHMA, while committing to an early review to deliver higher numbers that have emerged late in the Local Plan process. 2. Support for seeking to deliver in excess of the housing need figure identified in the SHMA. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The housing target should be reduced due to Green Belt constraints. 2. The housing target is out of date and does not reflect the higher requirement of 19,500 homes. The Objectively Assessed Need is therefore not being met.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> 3. Provision of additional jobs and infrastructure to meet this housing need is essential. 4. The housing target should be increased, including to reflect higher migration figures as the SHMA is based on data from 2001 to 2010 and therefore excludes years of higher migration (2011 and 2012). 5. The Plan should require a minimum proportion of new employment space be for B1 use to encourage higher order activities such as Research and Development. 6. The amount of employment floorspace that will be delivered should be identified. 7. It is unclear how the additional 9,700 jobs will be delivered. 8. Green Belt land should not be used to deliver employment growth. 9. Further employment land should be identified to cater for employment needs. 10. The rise in internet shopping means that the level of additional comparison goods floorspace may not be required.
3.3 Development Strategy	
3.3	<u>Objection</u> <ol style="list-style-type: none"> 1. The possibility of delivering a new settlement should not have been rejected at an early stage of plan making. This would be more sustainable than adding smaller developments to the edge of existing settlements. 2. No methods to support delivery are mentioned such as delivery partnerships, local housing companies and modern methods of housing construction. 3. Lower grade agricultural land should be used for housing rather than higher grade land.
3.3.2	<u>Support</u> <ol style="list-style-type: none"> 1. Support for Guiding Principle 6. <u>Objection</u> <ol style="list-style-type: none"> 1. The Guiding Principles are not consistent with housing or Green Belt policies.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> 2. Guiding Principle 3 is wrongly expressed and should say that development will be directed to settlements where people want to live. 3. Guiding Principle 4: it is not clear that new boundaries are 'unambiguous' or that they will be defensible in future. 4. Guiding Principle 7: unsound as the need for large scale strategic development has not been evidenced. 5. Guiding Principle 9: unsound as it promotes the principle of development in Green Belt locations on the edge of villages.
3.3.4	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. This paragraph does not reflect the fact that housing need does not need to be met in full if constraints such as Green Belt exist. 2. Delivery of 1,200 homes per year in the first 5 years is unrealistic.
3.3.7	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. A 5% buffer should have been used rather than 20%.
DPS2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The number of homes to be delivered in villages should be identified in order to assist in planning for school places. 2. The Council should evidence agreement with developers that town centre brownfield sites will be mixed use. 3. Clarification is required with regards to how housing needs arising from two functional housing market areas have been addressed. 4. There is a reliance on Neighbourhood Plans to bring forward development in villages – delivery is therefore uncertain.
3.3.10	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Should the Plan be adopted in 2018, there will still be a shortfall in 5 year land supply.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
3.3.13	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The need to 'plan positively' does not override the other three tests of soundness.
DPS3	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for the inclusion of various sites within the Plan. 2. Support for removing sites from the Green Belt in order to help meet housing need. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The Plan is over reliant on sites adjacent to the M11. If required highway infrastructure is not provided, the housing supply will be affected. 2. The Plan should not rely on SLAA sites which should form part of the windfall figure. 3. The cumulative impact of different developments on Rye Meads Sewage Treatment works should be considered. 4. Inclusion of Green Belt sites is unsound, Exceptional Circumstances have not been demonstrated. 5. There may be issues of double counting, particularly in relation to windfall, villages and SLAA categories. 6. The policy should distinguish between Green Belt sites and others. 7. Less housing should be directed to Bishop's Stortford. 8. More housing should be directed to villages. 9. East of Stevenage should be removed and replaced with a new Garden Village. 10. The Plan does not provide a 5 year supply of sites. 11. Some sites identified in the first 5 years don't have planning consent and further work is required to demonstrate their deliverability. 12. There is a need for a greater number of smaller sites which will deliver housing early in the Plan period. 13. A lapse rate of 10% should be incorporated within the commitments figure.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>14. There is no Housing Implementation Strategy as required by Para 47 of the NPPF.</p> <p>15. There is no contingency plan should development not come forward as expected.</p> <p>16. There is not sufficient evidence to suggest that 50 homes per year will be delivered as windfall.</p> <p>17. Including a windfall allowance in the first 5 years (2017-2022) is inappropriate.</p> <p>18. There should be a breakdown of housing numbers for commitments and completions in order to understand the true level of development that is being directed to different settlements.</p> <p>19. Various alternative sites have been promoted as being suitable for allocation.</p>
3.3.20	<p><u>Objection</u></p> <p>1. There are a large number of gaps in the Infrastructure Delivery Plan and therefore the District Plan cannot be considered 'sound'.</p>
DPS4	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for identification of the importance of providing appropriate levels of infrastructure. 2. Support for the policy approach. 3. Support for identification of highway infrastructure schemes in the Harlow area including Stort Crossings and M11 junctions. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Green Infrastructure should be added to the list. 2. A120 improvements to facilitate development in Standon and Puckeridge should be included. 3. The completion of the south eastern portion of the Bishop's Stortford bypass is required. 4. There are already infrastructure deficits. 5. The identification of the 'full option' for improving Junction 8 of the M11 is required at an early stage. 6. There is no certainty of delivery of infrastructure schemes.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Regard will need to be had to ongoing transport modelling, and in particular outputs of the COMET model in relation to impacts on the A10 within Broxbourne Borough.
3.3.22	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The cumulative need for strategic infrastructure, taking into account growth in neighbouring areas, has not been evidenced.
3.4 Review of the District Plan	
3.4.1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. It is unclear how the uplifted figure of 54,600 with 19,500 in East Herts has been reached.
DPS5	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. The commitment to review the Plan is in conformity with the MoU on the distribution of housing need across the Housing Market Area. 2. Support for an early review of the Plan. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The policy should say that a review of the Plan will make provision for additional homes depending on the provision of necessary infrastructure, both within and outside East Herts District. 2. This policy is not compliant with the NPPF as East Herts is not meeting its full housing needs. 3. There is no reason why additional sites could not be identified now through this Plan. 4. The policy could be broadened to state that the outcomes of further transport modelling, particularly in relation to the deliverability of highways schemes such as a Hertford and North Harlow bypasses, may trigger a review of the Plan. 5. There needs to be an indication of the timing of any review.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
3.5 Neighbourhood Planning	
3.5	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Requirement for additional text which says that Neighbourhood Plans may not promote a lower level of development than that identified in the District Plan.

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Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
4.1 Green Belt	
4.1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for the use of Green Belt for development <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Chapter is not necessary as it repeats the NPPF 2. Plan is contrary to the NPPF and purposes of the Green Belt 3. Site specific objections – why some Green Belt sites have been chosen over others, why certain sites have not been allocated – Green Belt Review findings are disputed 4. Green Belt Review does not assess all small sites on edge of Green Belt villages and therefore the Plan does not assess all reasonable alternatives 5. Plan is contrary to recommendations in the Green Belt Review – all land that does not make a significant contribution should be released, important sites have been allocated for development 6. Plan does not safeguard/remove Green Belt land for future development 7. Loss of Green Belt will harm biodiversity 8. Loss of Green Belt will result in lost agricultural resource 9. Opposition to loss of Green Belt in Bishop’s Stortford, Watton-at-Stone, north and east of Ware, east of Welwyn Garden City, the Gilston Area and east of Stevenage
4.3 Exceptional Circumstances	
4.3	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Exceptional circumstances exist to justify release of land from the Green Belt to accommodate

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>housing needs</p> <p>2. Support for land to the west of Sawbridgeworth (south of West Road) – advocates 300 homes</p> <p><u>Objection</u></p> <p>1. Failure to remove Westmill Quarry and Landfill Site from the Green Belt in accordance with the Waste Local Plan</p> <p>2. No exceptional circumstances proven for release of Green Belt</p> <p>3. Does not address requirement to balance housing need i.e. Green Belt as a constraint to reduce housing need</p> <p>4. Exceptional circumstances need to be proven for each site</p> <p>5. Housing need does not constitute exceptional circumstances</p> <p>6. Lack of suitable alternatives is not an exceptional circumstance</p> <p>7. No evidence of a lack of suitable sites – land to the north of the district should be considered for a new settlement</p> <p>8. Brownfield land should be used first</p> <p>9. No compensatory Green Belt proposed to replace lost</p> <p>10. Opposition to loss of Green Belt in Bishop's Stortford, Watton-at-Stone, north and east of Ware, east of Welwyn Garden City, the Gilston Area and east of Stevenage</p> <p>11. Incorrect boundary around Spellbrook</p> <p>12. Opposition to altering Green Belt boundary around Tewin</p> <p>13. Green Belt Review evidence base is not sound as it does not consider all smaller alternative sites</p>
4.4 Planning Applications in the Green Belt	
4.4.1	<p><u>Objection</u></p> <p>1. Conversion to residential use and replacement of buildings should be permitted</p>
4.4.2	<p><u>Objection</u></p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	1. Paragraph is not needed as the proposals are not covered by exceptions
4.5 Neighbourhood Planning	
4.5	<u>Objection</u> 2. Green Belt boundaries should be amended only through the District Plan, not left to Neighbourhood Plans, which are only encouraged, not required 3.
Policy GBR1 Green Belt	
GBR1	<u>Support</u> 1. Support for removal from the Green Belt and allocation of land east of Stevenage – if not used it should be safeguarded <u>Objection</u> 1. Adds no additional value to the NPPF policy 2. Green Belt Review evidence base is not sound as it does not consider all alternative sites – land to south west of Sawbridgeworth is cited as an example 3. Plan should remove land from the Green Belt and allocate further land to the west of Sawbridgeworth and around the villages of Hertford Heath, Stanstead Abbots & St Margarets and Watton-at-Stone <u>Other Comments and Observations</u> 1. Reference to other benefits of reducing light pollution could be added to the supporting text
4.7 Planning Applications in the Rural Area Beyond the Green Belt	
4.7.1	<u>Objection</u>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	1. No definition of 'material harm'
Policy GBR2 Rural Area Beyond the Green Belt	
GBR2	<u>Objection</u> <ol style="list-style-type: none"> 1. Development should be considered on its merits not restricted 2. Adds no additional value to the NPPF policy 3. No justification for applying Green Belt approach to the rural area beyond the Green Belt 4. New builds beyond the Green Belt are considered unacceptable but the Plan proposes new builds on Green Belt land 5. Such a restrictive approach should not be applied when there is a housing shortfall 6. Many of the things restricted would be permitted by the GDPO so do not need planning permission 7. Affords less protection than the 2007 Local Plan Policy GBC2 8. It is not clear if this would preclude development in a village 9. Should be amended to 'Countryside Protection' rather than Green Belt protection policy 10. Should define % and type of affordable homes 11. Should emphasise redevelopment of brownfield land in villages 12. Neighbourhood Plans should not be the only means to accept development in the rural area as they are voluntary and not required

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
5.1 Introduction	
5.1.1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Inadequate healthcare facilities to accommodate existing and new population 2. Princess Alexandra Hospital in Harlow cannot accommodate new growth – should be a new hospital provided in Bishop's Stortford 3. Should be a new GP surgery in the town centre 4. No Green Belt development while brownfield sites exist 5. Development will result in harm to wildlife and loss of agricultural land 6. Loss of infrastructure over time despite growth
5.1.4	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for relocation of the Bishop's Stortford High School to Bishop's Stortford South in order to facilitate expansion of the secondary school to accommodate additional demands and to facilitate the expansion of Thorley Hill Primary School. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Insufficient educational capacity to accommodate new development at primary and secondary level 2. As expansion of Thorley Hill Primary is reliant on the relocation of the Bishop's Stortford High School, the Plan may need to make additional provision for a 2fe primary school 3. No rationale for additional secondary school demands 4. Plan does not take account of cumulative growth and demands from neighbouring authorities 5. Success of local schools result in large numbers travelling from outside town – more provision is required to provide for this

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
5.1.5	<u>Objection</u> <ol style="list-style-type: none"> 1. Traffic congestion, already bad, will be exacerbated by new development causing a worsening of air quality. 2. Lack of parking in the town centre 3. Lack of road capacity in the town centre and around the station 4. Urban extensions are poorly served by public transport 5. A south-eastern bypass is required 6. Junction 7a will create more traffic 7. Inadequate cycling and pedestrian infrastructure
5.1.6	<u>Objection</u> <ol style="list-style-type: none"> 1. No need for new employment land
5.1.7	<u>Objection</u> <ol style="list-style-type: none"> 1. Further expansion will destroy the town's character 2. Historic environment needs to be given greater consideration.
5.3 Development in Bishop's Stortford	
BISH1	<u>Objection</u> <ol style="list-style-type: none"> 1. Bishop's Stortford has taken too much development and should take no more 2. Growth in homes has not been supported by growth in services 3. Development should not occur on Green Belt land while brownfield sites exist 4. No release of Green Belt should occur 5. Urban extensions are detached from the historic town and community 6. Growth will cause coalescence 7. Several additional sites are advocated to assist in meeting housing needs (Sunset Cottages at Thorley Lane, land at Hallingbury Lane, land at Dolphin Way and land at Bishop's Stortford College)

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
BISH2	<u>Support</u> 1. Support for reference to the town centre planning framework
BISH3	<u>Objection</u> 1. Land at Bournebrook House should not be prejudiced by this policy, nor be bound to the preparation of the masterplan. 2. Policy over-estimates rate of delivery in first five years – 600 homes is more realistic 3. Allotment off Rye Street should be retained – home for particular bee species 4. Objection to the omission of requirement for indoor and outdoor sports facilities as part of off-site infrastructure 5. Insufficient infrastructure to support development 6. Loss of Green Belt 7. Area has badger activity <u>Other Comments and Observations</u> 1. Strategic drainage infrastructure likely to be required. 2. The approved planning application has agreed the provision of a six-form entry secondary school, so an amendment is necessary. 3. Amendment suggested for more mention of additional demand on Junction 8 of the M11 and that the Plan should secure funding from developers to improve junction capacity. This issue is repeated for each proposed site allocation. 4. Concern about access to the town for new residents
BISH4	<u>Objection</u> 1. Objection to requirement for open space on this land as the whole site needs to be developed for housing to pay for the secondary school at Bishop's Stortford North. 2. Objection to the lack of engagement on this site prior to the allocation

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
5.3.14	<u>Objection</u> 1. Countryside object to requirement to create an SPD from the detailed masterplan.
BISH5	<u>Support</u> 1. Support the requirement to provide indoor and outdoor sports facilities 2. Support for the relocation of the school to facilitate the delivery of a new fit-for-purpose educational facility of asset to the town. Current school site does not enable expansion and will contribute enabling development. <u>Objection</u> 1. Countryside object to requirement to provide self-build plots, stating viability as an issue. 2. Loss of Green Belt – no exceptional circumstances proven. 3. Several developers dispute ability of the site to deliver its proposed numbers within the first five years. 4. Impact on congestion and subsequent impact on air quality 5. Allocation is under the flight path for Stansted Airport 6. Dispute need for a school in this location 7. Impact on the natural environment 8. Loss of arable farmland 9. Impact on the Hertfordshire Way public footpath 10. Relocation of the secondary school will not provide additional provision 11. Site comprises flood zone 12. As this land is within Thorley parish and Thorley is designated a Group 3 Village, this scale of development is not acceptable. 13. Insufficient healthcare to support the site. 14. No rationale for scale of employment land required

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. The site should be developed with sensitivity to its historic context, and should reference historic assets such as Wallbury Camp in neighbouring Uttlesford. 2. The policy may need amending depending upon the relocation of the secondary school and expansion of Thorley Hill Primary School. 3. Clarification sought on the types of green infrastructure connections being requested and suggest amendments to assist clarification and to minimise and mitigate recreational pressure on the Thorley Flood Pound SSSI. 4. Agreement has been reached with Natural England to focus connections to Southern Country Park to the west, rather than towards the SSSI to the east. 5. Land covers mineral reserves which need consideration
BISH6	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The policy does not reference the proposed expansion of Thorley Hill Primary School 2. Objection to the requirement for playing pitches as these will be provided at Bishop's Stortford South, and seek clarification of the amount of land to be used for this purpose. 3. Poor quality of the existing school should not influence decision <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Amendment suggested to link the delivery of the open space to the development at Bishop's Stortford South to ensure an adequate provision of open space is made for both sites. 2. Concern that emergency services cannot access the site
BISH7	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. 400 homes does not optimise the development potential of the site. 2. Objection to the requirement for self-build homes as it will not optimise development potential

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>and are not suitable for an urban site.</p> <p>3. Objection to the land use restrictions and suggest greater flexibility of use should be included.</p> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Site needs better pedestrian and cycling connections 2. Policy should reflect the current application 3. Current application should not influence creation of the policy 4. No certainty of permission due to flooding issues 5. Sufficient parking is required for all uses including neighbouring leisure complex
BISH8	<p><u>Support</u></p> <p>Sufficient evidence is provided to support the allocation – request enhancing the policy to ensure the sequential approach informs site layout and a site-specific flood risk assessment forms part of the masterplanning.</p> <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to masterplanning being through the town centre planning framework 2. Objection to the lack of clarity in terms of parking spaces, the idea of a new car park to the north of Link Road, and question its delivery as it is beyond the site allocation boundary. 3. Creation of a multi-storey car park on the current Council car park suggested 4. Development is within the floodplain
BISH9	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Lack of healthcare to serve this development 2. Proposed layout should be a through road not two separate parts which will lead to a segregated community if all affordable homes are located within one part of the site. 3. New roads will be too narrow, have insufficient sight lines, will be hazardous and prevent

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>service vehicles accessing the whole road. Parking restrictions will be required.</p> <ol style="list-style-type: none"> 4. Loss of Green Belt. 5. The site will be expanded in the future. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Amendments suggested to make the proposed mitigation more site specific – such as upgrades to the localised sewerage network <i>in order to serve the development</i>. 2. Traffic calming measures are required given proximity of the site to Birchwood School and the inappropriate use of the road for school related traffic.
BISH10	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. A strategic flood risk assessment is required to provide evidence. 2. Certainty over potential housing number is required to enable proper infrastructure planning including education. 3. A number of amendments are needed to make policy requirements such as pedestrian routes towards the town centre and station, including river frontage access and mooring points subject to tests of feasibility and viability. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Policy should make it clear that residential uses on part of the site would not be appropriate if the mill is still in operation. Amendments suggested to this effect.
5.4 Employment in Bishop's Stortford	
5.4	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Growth in the town has not been matched by growth in jobs
BISH11	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to requirement for employment land at Bishop's Stortford South as part of wider

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>objection to the site allocation.</p> <ol style="list-style-type: none"> 2. The current Bishop's Stortford Community Football Club grounds should be allocated for employment uses. 3. Remove employment land designation at the Stort Valley Industrial Estate or enable changes of use. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Suggested amendment to the policy to introduce flexibility in terms of how the site could come forward in parts, provided it does not undermine continued operation of the mill.
5.5 Retail Leisure and Recreation in Bishop's Stortford	
BISH 12	<p><u>Support</u></p> <p>The policy is supported but concern is raised that new emerging evidence will not have been planned for appropriately.</p> <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to the inclusion of land at Bishop's Stortford College within the Green Wedges in Bishop's Stortford and by definition, the allocation of college land for local green space. 2. Objection to the allocation of their land at Bishop's Stortford College under Policy CFLR 1. 3. Plan fails to allocate land for new sports facilities and pitches, including rugby and football.

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6.1 Introduction	
6.1.6	<u>Other Comments and Observations</u> <ol style="list-style-type: none"> 1. Suggestion that wording should be amended to reflect a ‘considerable’ loss of employment in the town. 2. Reference should be made to the findings of the Buntingford Employment Study.
6.1.7	<u>Objection</u> <ol style="list-style-type: none"> 1. Figure of 1,100 dwellings is incorrect; this should be amended to 1,328 dwellings having been approved or built in the town.
6.1.9	<u>Other Comments and Observations</u> <ol style="list-style-type: none"> 1. Query as to in what context the word ‘additional’ is being used. 2. Retirement and sheltered housing is required to support the ageing population.
6.1.10	<u>Objection</u> <ol style="list-style-type: none"> 1. The provision of new playing fields at Freman College has not definitely been secured through the S106 agreement for the development to the north of the town. <u>Other Comments and Observations</u> <ol style="list-style-type: none"> 1. It is not clear how expansion of Edwinstree Middle School can take place as it is surrounded by land designated as open space. 2. Clarification sought as to what form the expansion plans would take and how expansion would be funded.
6.1.11	<u>Objection</u> <ol style="list-style-type: none"> 1. The ability of village schools (eg. Hormead CE First and Nursery School) to assist in meeting the educational need in Buntingford has not been considered. 2. The expansion of Layston School should be secured before a new first school is delivered.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. It is not clear how expansion of Millfield and Layston schools can take place without encroaching onto land designated as open space.
6.1.12	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The reference to ‘financial contributions towards the implementation of a Community Transport project have been secured’ is inaccurate; only two of the permitted developments have contributed through S106 legal agreements. 2. Reference to cycle track links within the town is idealistic; there is no space in the town for upgraded cycle links. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Reference needs to be made to the congested roads in the Buntingford area and poor links to major roads (A1, M11). 2. Reference needs to be made to the fact that Buntingford has no rail link. 3. Dualling of the A10 is essential to accommodate the level of committed development. 4. Bus provision from Buntingford needs to be vastly improved.
6.1.13	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Suggest the word ‘may’ should be changed to ‘will’. Evidence provided by Thames Water in response to the Neighbourhood Plan states that the wastewater network will not cope with the level of development already permitted.
6.1.14	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Undeveloped designated employment land will remain unsold unless employment land is proactively sponsored in the Plan.
6.1.15	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Buntingford Library should be included as a key facility which could be developed for additional uses to benefit the community.

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	2. Location of the Buntingford Library should be protected.
6.1.16	<p><u>Support</u></p> <p>1. Support new facilities to the north of the town.</p> <p><u>Objection</u></p> <p>1. The current evidence is not up to date and the Plan may not have a justified strategy for dealing with open spaces.</p> <p>2. There is no significant provision for newly created open space within the town.</p> <p>3. There is no Green Infrastructure allocation in the IDP for Buntingford.</p> <p><u>Other Comments and Observations</u></p> <p>1. Unclear where the large open space and new playing pitches will be provided as part of the development to the north of the town.</p> <p>2. There is a critical requirement for health facilities in Buntingford.</p>
6.1.17	<p><u>Objection</u></p> <p>1. This paragraph is meaningless and does not reflect what is happening in the town.</p>
6.2 Development in Buntingford	
BUNT1	<p><u>Support</u></p> <p>1. Support expressed for inclusion of school sites within the settlement boundary.</p> <p><u>Objection</u></p> <p>1. Query as to why no allocations have been made in one of the 5 towns within East Herts.</p> <p>2. Buntingford lies outside of the Green Belt so should be a priority for growth.</p> <p>3. Policy restricts development in a sustainable location.</p> <p>4. Land west of Buntingford should be allocated for development of 400 homes and provision of a first school site.</p> <p>5. Land west of London Road should be allocated for residential development.</p> <p>6. Policy wording should be amended to read 'settlement boundary' instead of 'town boundary'.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>7. The settlement boundary should be amended to align with the settlement boundary identified in the Buntingford Community Area Neighbourhood Plan.</p> <p>8. Policy needs more flexibility to allow development to be permitted where it would facilitate community benefits.</p> <p>9. The policy should clarify that development is only appropriate where it protects or enhances the historic environment.</p> <p>10. Further windfall development should not be permitted in Buntingford.</p> <p><u>Other Comments and Observations</u></p> <p>1. Consideration is being given to whether the Buntingford Cougars playing pitch could be developed for housing to generate funds for improved football facilities nearby.</p>
6.2.7	<p><u>Support</u></p> <p>1. Support the dual use of the proposed school's playing pitch facilities with the wider community.</p>
BUNT2	<p><u>Support</u></p> <p>1. Support expressed for allocation of a new 2FE first school site on land west of London Road.</p> <p><u>Objection</u></p> <p>1. Policy is currently unsound as delivery of a new school by 2019 is not certain.</p> <p>2. Site selection study needs to be revisited to select the most appropriate site for a new school.</p> <p>3. Site has multiple landowners which may prohibit delivery.</p> <p>4. Such a large increase in school place provision in Buntingford will impact on local village schools and may make some financially unviable.</p> <p>5. Settlement boundary should be amended to include the site.</p> <p>6. Site is considered to be more appropriate for residential development.</p> <p>7. Residual area of site not developed as a school or designated as open space should be allocated for residential development.</p> <p>8. Site is not in a sustainable location; a central site would be more appropriate to reduce car</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>journeys.</p> <p>9. Site is currently in recreation use by the football club and the loss of community facilities should not be allowed.</p> <p>10. Location adjacent to petrol station could cause health issues.</p> <p>11. Criterion (d) of the policy should also make reference to the replacement of the pitch as this may be necessary to facilitate the development of the school.</p> <p>12. The policy wording does not appropriately reflect the need for the school’s playing pitch facilities to be for dual community use.</p> <p>13. The existing football pitch is a dedicated pitch and dual use of this facility would compromise its quality. Only the new pitch should be provided as a dual use facility.</p> <p>14. Land west of Buntingford should be allocated for provision of a new first school.</p> <p><u>Other Comments and Observations</u></p> <p>1. Unclear whether the retention of a playing pitch is referring to the existing Cougars pitch or a new pitch created in addition to the Cougars pitch.</p> <p>2. Improvements to the highway infrastructure will be required to reduce congestion.</p> <p>3. Speed limit on London Road should be reduced to 30mph or less.</p> <p>4. Access to this site would need to be extensive and mitigation would be costly.</p> <p>5. Clarification required that the retained or replaced playing pitch is required to be of equivalent size and quality.</p> <p>6. Wastewater network capacity may be unable to support this development and local upgrades may be required.</p>
6.3 Employment in Buntingford	
BUNT3	<p><u>Support</u></p> <p>1. Support expressed for policy.</p> <p><u>Objection</u></p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> 1. The Watermill Industrial Estate should not be developed any further. 2. The northern part of Watermill Industrial Estate should be removed from the employment land designation and allocated for residential uses. 3. Policy should be expanded to have regard to the additional future employment needs of the town. There is no allowance or flexibility for further employment growth and the need to replace any loss of employment land to other uses. 4. Land opposite the Sainsbury's depot roundabout (south west of Buntingford) should be allocated for employment use. 5. Objection to the designation of Park Farm Industrial Estate beyond the existing developed part of the employment site.
6.5 Leisure and Community Facilities in Buntingford	
6.5	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. There should be plans for more new sport and leisure facilities in Buntingford. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Query as to why no up to date assessment of recreational open space has been prepared. 2. This section should be amended prior to examination once the emerging strategies for both indoor and outdoor sports facilities have been completed.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
7.0 Chapter 7 Hertford	
7.1 Introduction	
7.1.7	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Plan welcomed overall, subject to specific points. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Development will exacerbate already congested road network in Hertford and insufficient mitigation identified. 2. Development in Green Belt contrary to policy. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Low density, high quality houses considered important as opposed to flats, in terms of housing mix.
7.1.8	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. A414 congestion concerns. 2. Mangrove Road traffic increase safety concerns. 3. No reference to Primary/Junior/disabled school needs. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. 950 dwellings proposed on the allocated sites in Hertford would require 1.9fe of school places.
7.1.9	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Failure of section to present the scale of issues present on the A414 and the need for a strategic intervention/bypass, the likely process for identifying potential solutions, the expected current timeframe for available capacity (2024) and the consequential likely timeframe for the strategic intervention/bypass (2021 onwards according the LTP Vision). 2. Failure of section to acknowledge the implications for the development strategy arising from the

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>uncertainty relating to the strategic intervention.</p> <ol style="list-style-type: none"> 3. A414 congestion concerns. 4. Tunnel should be created from London Road near to Hertingfordbury Road, west of the railway viaduct. 5. Concern regarding extra development exacerbating already congested road network and not enough weight placed on amelioration. 6. Need for additional car parking at the railway stations. 7. Air quality level concerns in Hertford, particularly areas close to the A414. 8. Noise pollution concerns in Hertford, particularly areas close to the A414. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. A414 should be able to accommodate development up to 2024.
7.1.10	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Concern about water supply in Hertford. 2. Concern about medical and healthcare provision in Hertford. 3. Acknowledgement that the Green Fingers would be protected but other green spaces within Hertford, such as at Sele Farm and beside County Hall, are equally important and should be retained.
7.2 Development in Hertford	
7.1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Key Diagram refers to 'potential road improvements', with annotation relating route of A414 through town, implying (in conjunction DPS4) on-line improvements. However, off-line bypass currently forms potentially significant strand to major schemes emerging through Herts LTP process (expected delivery timeframe of 2021-2031).

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HERT1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The word 'approximately' should be put before housing numbers for a, b, c and d. 2. Hertford Industrial Estate (Caxton Hill) should be allocated for residential development. 3. Density of sites in Hertford should be increased. 4. 306-310 Ware Road should be allocated in the Plan for residential development. 5. HERT2 site should be allocated for 400 dwellings. 6. Two discounted sites (76Ha North of Hertford and 48 Ha immediately South of Hertford) should be allocated in place of Birchall Garden Suburb to meet Hertford's housing need. 7. Policy amendment sought to include mixed-use allocation of the Dicker Mill site. 8. Deliverability of 150 homes from land north of Hertford questioned given allocation of neighbouring land for gravel extraction. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Unclear whether the Plan takes account of development/planning approvals which have been implemented in Hertford since 2011 these should be included in total.
HERT2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. 200 dwellings in the Mead Lane area considered sensible given brownfield site status, but further development not sustainable in this area without measures to improve traffic infrastructure, given already problematic road access to the site. 2. Development should proceed unless road network improved, especially for crossing the railway line. 3. Development should only comprise employment or leisure uses as site at risk of flooding. 4. Policy should include requirements for the sequential approach to inform site layout and an adequate FRA based on information provided within the level 2 SFRA, in addition to meeting requirements of flood risk policy WAT1. 5. Policy should reference Grade II listed Hertford East Railway Station and the need for

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>development to be sensitive to this building.</p> <ol style="list-style-type: none"> 6. Allocation of 3000sqm at Mead Lane not justified as it exceeds the requirements set out in DPS1 and would limit the scope to provide much needed new homes. 7. The site is not appropriate for B1 development. 8. Infrastructure requirements not justified. 9. Requirement to meet housing mix and affordable housing, unless there was an exception to these, will need to be addressed in any case, so should be deleted. 10. Split of housing at Mead Lane should be a higher proportion of flats and smaller units due to the central location. 11. Dicker Mill should be allocated for 260 homes. 12. As site lies within the Sand and Gravel Belt (Hertfordshire Minerals Local Plan, March 2007), additional wording sought as a commitment to consider 'opportunistic extraction' for use on site to prevent the mineral being sterilised where possible. 13. Mead Lane Industrial Estate appropriate for alternative uses (including residential) and could be available for redevelopment within the next five years. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Recognition that sequential test and level 2 Strategic Flood Risk Assessment (SFRA) have been undertaken. 2. In principle agreement of wastewater infrastructure capability.
HERT3	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for development 2. Support for minerals wording 3. Sustainable location 4. Well screened site ensuring minimal visual impact 5. Support for recognition of importance of wildlife sites/issues in policy.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Exceptional circumstances for Green Belt removal not justified. 2. Traffic impact concerns. 3. Concern that Hertford North Train station too overcrowded and development will add to issue. 4. Wastewater network capacity in this area may be unable to support this development. Local upgrades may be required. 5. Concern regarding potential badger presence and need for full ecological survey to be carried out. 6. As sites physically separated, a split into two allocations would be more effective. 7. Area to north of Welwyn Road should provide 350 homes (50 additional dwellings) at 27homes/ha. 8. Southern part of HERT3 for residential development runs counter to the Plan's protection and enhancement of the historic environment and of biodiversity Strategic Objectives. 9. Concern over impact of development on Grade II Panshanger Park and erosion of small rural buffer. 10. Light and noise pollution from development and loss of separation from the urban sprawl of Hertford would contribute to substantial loss of setting of Panshanger Park. 11. Concerns about effects of development on ecology, woodlands, noise, environmental impact and interfluvial issues. 12. Objection to loss of agricultural land.
7.2.9	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. 150 homes would exacerbate B158 congestion.
7.2.10	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Wording should be removed so that focus is solely related to sterilisation of potential mineral reserves at site. Due to close proximity of known mineral reserves in Preferred Area 2 (as

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>identified in the Minerals Local Plan 2007), likely that HERT4 also contains sand and gravel and material should not be needlessly sterilised and may also be used in the construction phase of development.</p> <p>2. Commercial viability questioned.</p>
HERT4	<p><u>Support</u></p> <p>1. Support for minerals wording.</p> <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Traffic impact concerns. 2. Traffic access concerns. 3. Public transport (buses) inadequate to cope with development. 4. Exceptional circumstances for Green Belt removal not justified. 5. Education capacity concerns. 6. Concern about topography limiting cycling and pedestrian access. 7. Density too high. 8. Deliverability questioned adjacent to gravel extraction. 9. Concern about effects of mineral extraction. 10. Concern regarding impact on Waterford Heath. 11. Concern about effect on Green Fingers. 12. Concern regarding effects on wildlife. 13. Loss of open space. 14. Loss of local landscape. 15. Concern about light pollution. 16. Objection to loss of agricultural land. 17. Concern that site would become isolated/segregated. 18. Insufficient local services to serve development.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ul style="list-style-type: none"> 19. Concern regarding juxtaposition with conservation area. 20. Paragraph I – ‘the satisfactory previous phased extraction of mineral deposits on the neighbouring site’ should be removed. 21. Wastewater network capacity in this area may be unable to support this development. Local upgrades may be required. 22. Part 1 should state ‘approximately 150 homes’, for consistency with HERT1. 23. Part 1 “the satisfactory phased extraction of minerals deposits on the neighbouring site”. It should clarify that this applies only to the first phase adjacent to the northern edge of HERT4. 24. Policy should allow for northern part of site to come forward prior to 2022 if mineral extraction and restoration is completed before that date.
7.2.11/ Figure 7.6	<p><u>Objection</u></p> <ul style="list-style-type: none"> 1. The treed area is marked incorrectly and should be amended.
HERT5	<p><u>Support</u></p> <ul style="list-style-type: none"> 1. Support for minerals wording. 2. In principle agreement of wastewater infrastructure capability. <p><u>Objection</u></p> <ul style="list-style-type: none"> 1. Concern about proposal to remove area from Conservation Area, largely to protect the number of trees. 2. Site should be allocated for 65 homes rather than 50. 3. Traffic impact concerns relating to congestion on Mangrove Road and A414. 4. Concerns over the safety of children because of added traffic congestion. 5. Concerns over the protection of the Green Finger at the western part of the site. 6. Air pollution concerns. 7. Proposed upgraded pedestrian and cycle way will make an already narrow Mangrove Road

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>narrower.</p> <p>8. No clear definition or minimum requirement of expectations on range of dwellings, highway mitigation measures, improvements to walking and cycling routes, enhanced transport measures, and outdoor play and fitness spaces.</p> <p><u>Other Comments and Observations</u></p> <p>1. "Building line" on the Western boundary of the housing site should be consistent with the adjoining existing properties on either side.</p>
7.3 Employment in Hertford	
HERT6	<p><u>Support</u></p> <p>1. Support for protection of employment areas.</p> <p><u>Objection</u></p> <p>1. Objection to inclusion of County Hall site within the employment area. If the County Hall site is to remain within this employment area, the boundary should be amended to exclude Leahoe.</p> <p>2. Pegs Lane should not be designated as an employment area as County Hall and the open space could be converted to residential use.</p> <p>3. Plan allocates HERT2 for 200 dwellings as part of a mixed use development, it therefore should not also be located in a designation where land is reserved for class B1, B2 and B8 use, as these two policy objectives conflict.</p> <p>4. Mead Lane Industrial Estate is appropriate for alternative uses (including residential) and could become available for redevelopment within the next five years.</p> <p>5. Caxton Hill employment designation should be removed and identified as residential allocation.</p> <p>6. Caxton Hill employment designation should be removed and identified as residential allocation.</p> <p>7. No strong case to roll forward previous employment allocations, especially where evidence is available to suggest they will increasingly become commercially unviable for commercial purposes.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>8. Listed employment sites are not sufficient to meet new job requirements.</p> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Hertford has lost significant employment land in recent years and lacks small business units. 2. Concern that Hertford has already lost substantial employment land to residential development. If this continues this will leave an imbalance of population and employment in the town. 3. Evidence that older industrial areas in the town are being allowed to run down by their owners. landowners of the Caxton Hill Employment Area are intent on selling the land for residential development and short term leases mean that the future of the established business and others on the estate are in jeopardy.
7.4 Retail in Hertford	
7.4	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Retention of the historic character of the town centre is important and quality facades and associated advertising should be encouraged and enforced where necessary.
7.5 Leisure and Community Facilities	
7.5	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support the acknowledgement of the under-provision of football pitches. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Plan makes reference to the need for junior football pitches but there is also a requirement for full size pitches in Hertford. 2. Hertford is severely lacking in sports stadium resource. 3. Current evidence regarding provision of football pitches is not up to date so the Plan may not have justified strategy for dealing with open spaces and pitch provision. Modifications should be made to section 7.5 before EiP, when emerging strategies for indoor and outdoor sports facilities are completed, to address needs in Hertford.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<u>Other Comments and Observations</u> 1. Changing facilities lacking on Hartham Common.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
8.1 Introduction	
8.1.7	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Concern that additional capacity for secondary education will be provided in Bishop's Stortford and not Sawbridgeworth. This will cause further car journeys at peak time. 2. Pre-school requirements are not mentioned at all. 3. Leventhorpe School is seeking to expand secondary education provision and could potentially provide 1FE or 2FE of secondary provision on site. 4. No mention of demand for school places from adjacent settlements such as Lower Sheering. 5. Further primary provision may be required beyond expansion of Mandeville School to 2FE. 6. Expanding Mandeville is not appropriate given traffic concerns. 7. 1.2 hectares may be insufficient to expand Mandeville School and provide playing fields.
8.1.8	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. M11, Junction 7a will increase traffic congestion in the town. 2. Development will cause an increase in congestion on West Road which will also lead to pedestrian safety issues. 3. Traffic lights at the West Road/A1184 junction will exacerbate congestion and air pollution issues. 4. The need for a bypass has not been considered. 5. Congestion on the A1184 will cause rat-running on side roads which is a safety risk, particularly for children. 6. Need for additional parking provision. 7. Lack of rail capacity. 8. Concern over air pollution, particularly in relation to the Air Quality Management Area.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>9. Pedestrian and cycle routes should be improved across the town, not just at new developments.</p> <p>10. Additional bus services are required.</p> <p>11. More than 500 homes could be delivered in the town as a result of the upgrades to M11 junctions.</p>
8.1.10	<p><u>Objection</u></p> <p>1. Concern that the village of Spellbrook is not identified as part of Sawbridgeworth.</p>
8.2 Development in Sawbridgeworth	
SAWB1	<p><u>Support</u></p> <p>1. Support for development in Sawbridgeworth subject to delivery of supporting infrastructure.</p> <p><u>Objection</u></p> <p>1. Concern over infrastructure, particularly given that few schemes are costed and funded in the IDP.</p> <p>2. The impact of large scale development at Gilston and Bishop's Stortford has not been considered in this chapter.</p> <p>3. There is a shortage of G.P capacity in the town.</p> <p>4. A number of sites have been put forward as being more suitable than the proposed allocations.</p> <p>5. All three developments will need to make financial contributions to the expansion of Mandeville Primary School.</p> <p>6. The Sustainability Appraisal does not compare the sustainability of alternative sites with proposed allocations.</p> <p>7. Concern regarding utilities capacity including water and electricity.</p> <p>8. Exceptional Circumstances required to justify Green Belt release have not been demonstrated.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>Each of the site specific policies should include a criterion requiring investigation for 'opportunistic' mineral extraction.</p> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. The need to expand the town by 500 homes is accepted and the proposed locations are considered to be acceptable. 2. The wastewater network capacity in the area may not be able to support the proposed developments and upgrades may be required. Detailed drainage strategies should be prepared at the planning application stage.
SAWB2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Only 0.9 hectares is required to expand the school and therefore more housing could be provided on site. 2. The policy should say that delivery of utilities and infrastructure will be proportionate to each development. 3. The policy should include reference to sustainable transport as SAWB3 and SAWB4 do. 4. Expansion of the school will require loss of playing field. 5. Density of development will harm local character.
SAWB3	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The site is capable of delivering 300 homes. 2. The open space designation on the west of the site is not necessary and should be used for housing.
SAWB4	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for site. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy wording should include the need to consider access arrangements and improvements to West Road/A1184 junction as with SAWB2 and SAWB3.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> 2. The site is important in Green Belt terms given its function in preventing coalescence between Sawbridgeworth and Spellbrook 3. The suite has not been fully justified and may not be deliverable.
8.3 Employment in Sawbridgeworth	
8.3	<u>Objection</u> <ol style="list-style-type: none"> 1. There isn't enough information with regards to employment in the chapter.
8.4 Retail in Sawbridgeworth	
8.4	<u>Objection</u> <ol style="list-style-type: none"> 1. The retail strategy for Sawbridgeworth is inadequate.
8.5 Leisure and Community Facilities	
SAWB5	<u>Objection</u> <ol style="list-style-type: none"> 1. Support for allocation. 2. Deliverability of proposal is questionable. 3. The boundary of this site requires amendment as Leventhorpe School have acquired the piece of land to the north east of its current site to assist with expansion. This land also needs to be excluded from the Green Belt.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Chapter 9 – Ware	
Ware	<u>Objection</u> <ol style="list-style-type: none"> 1. Infrastructure unable to cope with new development. 2. Transparency needed on funding Council will receive for development and reasoning why it is on Green Belt high grade agricultural land. 3. Converting ancient market town into a new town. 4. No reason why Ware should not become a larger town, but better location for homes is needed. <u>Other Comments and Observations</u> <ol style="list-style-type: none"> 1. Insufficient consultation on the Plan.
9.1 Introduction	
9.1.2	<u>Objection</u> <ol style="list-style-type: none"> 1. Ware Arts Centre should be detailed in the paragraph.
9.1.5	<u>Objection</u> <ol style="list-style-type: none"> 1. Exceptional circumstances not proven for Green Belt release for housing.
9.1.6	<u>Objection</u> <ol style="list-style-type: none"> 1. Failure to explain how Ware’s infrastructure will absorb additional population and its requirements. 2. Traffic congestion issues. 3. Development will lead to loss of Ware’s unique historic character. 4. Infrastructure costings and timelines should be submitted for public consultation.
9.1.8	<u>Objection</u> <ol style="list-style-type: none"> 1. No proof of demand for Travelling Showpeople’s accommodation.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	2. Water table and water runoff/flooding concerns
9.1.9	<u>Other Comments and Observations</u> 1. Needs to be strong commitment to sympathetic design in keeping with local vernacular styles.
9.1.10	<u>Objection</u> 1. Insufficient school places for children with SEN/disabilities – EHC should work with Essex CC to meet demands of increased population.
9.1.11	<u>Objection</u> 1. Council must ensure that additional community infrastructure is provided. 2. Bus provision to hospitals should be provided. 3. Concern over provision of healthcare facilities and need for sufficient GPs and nurses. 4. Arts and crafts provision should be made in addition to sporting facilities and open spaces.
9.1.12	<u>Objection</u> 1. Traffic congestion concerns due to greater traffic flow/delays arising from development. 2. Link Road should be delivered before houses are provided. 3. Concern that the proposed link road will not offset the impact of the proposed development. 4. Concerns regarding impact of traffic generated on A10/A414/M25. 5. Railway already at capacity and there will not be enough spaces for London commuters. 6. Extra track is required at Station and the platform should be moved to the other side of the boom gate to facilitate this. 7. New train station required at top of Ware. 8. Insufficient parking at station. 9. Insufficient public transport provision. 10. Bus services in the town are sporadic and unreliable – unreasonable to expect people to use public transport. 11. Concern about the level of available parking in the town centre/station.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	12. More traffic modelling required. 13. Roads leading to development (New Road, High Oak Road and Musley Hill, etc) not wide enough to improve congestion and cycle paths also required. 14. Speed restrictions are required on High Oak Road, Musley Hill and Kingsway. 15. Improvements for traffic from the south of the town should be put in place.
9.1.13	<u>Objection</u> 1. Infrastructure (sewerage, electricity, schools, public services, including healthcare) must be provided prior to development. 2. Existing problems in the sewerage system should be addressed prior to any new development being constructed. 3. More green spaces required for sustainable drainage. 4. Concerns regarding water pressure in Ware. 5. Concern about effects on historic assets and wildlife (SSSI).
9.1.14	<u>Objection</u> 1. More car parking needed in the town centre to support shops.
9.1.15	<u>Objection</u> 1. Concern that trade diversion to new retail centre will impact negatively on existing shops in Ware. 2. Concern about loss of employment base in Ware – employment area in new development should be expanded. 3. Lack of leisure activities for the under 18s in Ware and indoor opportunities should be provided.
9.1.16	<u>Objection</u> 1. Lack of detail regarding how leisure/sports facilities will be provided – at Wodson Park, which is at 93% capacity, parking already inadequate. 2. Plan eradicates the walking networks and bridleways to the North of Ware, removing the

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>opportunity to exercise in relative safety.</p> <p>3. Section unclear around 'may be shared use' of recreational facilities – if uncertainty this should not be included in the Plan.</p>
9.1.17	<p><u>Other Comments and Observations</u></p> <p>1. Some areas covered by the proposed development are used for dog walkers and events such as fireworks – amenity should be replaced.</p>
9.1.18	<p><u>Other Comments and Observations</u></p> <p>1. Need to ensure trees (especially those covered by TPOs) are not removed before development.</p>
9.1.19	<p><u>Objection</u></p> <p>1. Creating small open spaces will not compensate for the accessible green spaces lost through the development.</p> <p>2. Proximity of Lea Valley Regional Park does not make it acceptable to lose other green spaces.</p>
Development in Ware	
WARE1	<p><u>Support</u></p> <p>1. Support for 1,000 homes.</p> <p>2. Satisfaction that no existing homes between Kingsway and Wodson Park will be demolished.</p> <p><u>Objection</u></p> <p>1. Based on site promoters' highways modelling, sufficient highway capacity is likely to exist within the Plan period to accommodate the additional 500 dwellings envisaged by Policy before the end of 2033.</p> <p>2. Heritage impact assessment should be undertaken for Hanbury Manor, Poles Park and Fanhams Hall.</p> <p>3. Development of a new town either between Widford and Spellbrook or between Bennington and Westmill should be considered instead.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>4. Concern at proposed scale of the expansion of Ware with range proposed between 200 and 3,000 homes. Development towards the higher end of the scale would have a hugely adverse impact on the nature of the town.</p> <p>5. More certainty required over the windfall allowance, providing a maximum figure.</p> <p>6. Inclusion of the Nun's Triangle sought for development.</p> <p>7. Crane Mead should be released from Green Belt and allocated for 150-200 dwellings within first five years of the Plan.</p> <p><u>Other Comments and Observations</u></p> <p>1. If development proceeds, construction of a ring road required from the A1170, across the river and railway and around the East and North of Ware to the A10 junction north of Ware to alleviate existing traffic difficulties before further construction considered.</p>
9.2.5	<p><u>Support</u></p> <p>1. Development a positive step for Ware and the surrounding area.</p> <p>2. Development will provide work for local people during construction and increased population will encourage more businesses and provide more jobs.</p> <p>3. Commitment to Green Infrastructure as recommended in the HRA report is commended.</p> <p><u>Other Comments and Observations</u></p> <p>1. Council trusted to ensure that local services such as schools, health services, transport links, etc will be provided.</p>
WARE2	<p><u>Support</u></p> <p>1. Impressed with the competent and professional preparation of Plan, particularly sections on flooding, water supply, drainage and sewerage.</p> <p>2. Support for Part V (q) requiring outdoor sports facilities, including football pitches.</p> <p>3. Support for minerals wording.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to Criteria I and II wording because of long-term highway capacity limitation assumptions and the resultant limit placed on dwelling numbers in the Plan period. Transport Authority's view (HCC) that there will be insufficient highway capacity throughout the plan period on the local and wider strategic road networks not accepted. Sufficient capacity will exist for up to 1,500 dwellings to be delivered. 2. Given high level of unmet housing need, development should not be prematurely restrained – could potentially commence on this site as early as 2020. 1,000 dwellings likely to be completed by 2027 so full development could be unnecessarily delayed for over five years, despite acknowledged shortfall of 1,460 dwellings in the total dwelling supply sources shown under Policy DPS 3. 3. Exceptional circumstances for removing site from Green Belt have not been demonstrated. 4. Urban sprawl. 5. Development doesn't reflect findings of Green Belt review. 6. Allocation of a site for Travelling Showpeople in the Green Belt is deemed inappropriate by the NPPF. 7. Inclusion of the Nun's Triangle site sought as part of allocation. 8. Brownfield sites should be used before development on this scale in historic countryside. 9. Braziers Gravel Pit should be built on instead of arable land. 10. Land to the south of Ware should be considered instead (better access to A10 and A414). 11. Development of a new town on the opposite side of Watton-at-Stone or further north on the train line should be considered instead. 12. Building north of Ware will cause Thundridge, Wadesmill and Cold Christmas to inevitably merge. 13. Area understood to be a Conservation Area.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> 14. Site will be visible from the village of Thundridge. 15. Need for development to be reconsidered in light of Brexit and effect on the economy 16. No evidence why alternative sites were rejected in favour of this site. 17. Objection to loss of grade 2 agricultural land/use of land contrary to bequest. 18. Concern that development of 1,000 dwellings would not be viable. 19. Size of the development (approaching 50% of the current size of Ware) represents massive over development of the town (12% – 19%) in population. 20. Ware circa 8,000 households (2011 census), on which basis there could be up to 4,000 new homes built on allocation, yet only 1,000-1500 are planned – extravagant use of green belt land/hidden plan to add a lot more houses in future. 21. Site area is the same as that previously identified for 3,000 homes yet proposed number is half. 22. Concern over level of development compared to Hertford dwelling numbers. 23. Policy does not take into account 90 homes recently built in the town. 24. Concern about impact on local roads and public services/infrastructure unable to cope. 25. Relief road will not assist congested routes to the train station. 26. Need for link road questioned/not enough detail on route. 27. Link road will cut Ware from Great Amwell. 28. Plans of development not detailed enough. 29. Traffic impact on A414 and need for Hertford bypass before development in Ware. 30. A10 capacity concerns. 31. Station (and vehicular access to it) capacity issues. 32. Strategic rail strategy required as no plans to make rail improvements. 33. Bus service funding for development questioned given cuts in other bus services. 34. Concern re importance of ensuring extension to the town is suitably connected to the rest of

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>the community and not isolated.</p> <p>35. Concern about how this additional population will be able to access an already heavily congested town centre.</p> <p>36. Increase in noise and air pollution in Ware.</p> <p>37. Concern about electricity supply to new homes.</p> <p>38. Sewage and drainage capacity/flooding concerns.</p> <p>39. Policy at Part V (m) should be amended to refer to the provision of 3FE primary school to include early years provision and delete reference to catchment areas.</p> <p>40. Policy at Part V (n) should be amended to refer to the provision of a site for 6FE Secondary school (with room to expand to 8FE) and delete 'Schools Planning'.</p> <p>41. Schools are oversubscribed – one school not enough to ease pressure.</p> <p>42. Concern over the lack of Nursery and Pre-School places</p> <p>43. Concerns about local health provision capacity and wider access to existing hospitals.</p> <p>44. Hospital required to support development.</p> <p>45. No indication Police and Fire departments will operate efficiently to support large development.</p> <p>46. Concern that Jackson Wood will be destroyed.</p> <p>47. Concerns about wildlife and existing green infrastructure.</p> <p>48. Net loss of biodiversity</p> <p>49. Effects on the greenbelt and the Amwell nature reserve would be irreversible.</p> <p>50. This area of Green Belt used for recreation purposes e.g. walking, dog walking, cycling and horse riding.</p> <p>51. Concerns about sporting facilities provision.</p> <p>52. Ware already lacking in Accessible Natural Greenspace and development of this scale will further reduce ANG.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>53. Burial space required.</p> <p>54. Concern that part of site has been sold to Haringey Council so will not meet East Herts' housing needs.</p> <p>55. Garden City principles not possible to achieve as site is on the edge of a community contributing to urban sprawl.</p> <p>56. Concern over the type of employment provided as may result in too many HGVs.</p> <p>57. Concern that congestion from additional development would make the town less desirable and dissuade Glaxo from remaining.</p> <p>58. Development will destroy the setting of the Japanese Gardens/pose threat to historic landscape at Fanhams Hall.</p> <p>59. Concern over impact on Round House.</p> <p>60. Heritage impact assessment should be carried out for Hanbury Manor, Poles Park, the Round House and Fanhams Hall.</p> <p><u>Other Comments and Observations</u></p> <p>1. Travelling showpeople location not clear – should not be provided within residential area.</p> <p>2. No more flats/starter homes needed – more family homes required.</p> <p>3. Infrastructure to be provided before development.</p> <p>4. Coherent and viable highways plan for Ware is essential before this scheme can be considered, both in relation to access to the A10 and into and out of Ware itself.</p> <p>5. If development proceeds, construction of a ring road required from the A1170, across the river and railway and around the East and North of Ware to the A10 junction north of Ware to alleviate existing traffic difficulties before any further construction is considered.</p> <p>6. Wastewater network capacity in the area may be unable to support this development and local upgrades may be required – detailed drainage strategy should be submitted with planning application.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> <li data-bbox="416 312 2042 432">7. 3FE primary requirement could be met by a new 2FE on site and expansion of Priors Wood School by 1FE. However, this would require a new access to Priors Wood School through the proposed development. <li data-bbox="416 440 2042 520">8. The secondary school will require access to main roads and should be located close to the A10 junction (north of Wodson Park). <li data-bbox="416 528 2042 608">9. The Cow Fields/fireworks field is an important community asset and should be retained as open space. <li data-bbox="416 616 2042 647">10. Archaeological dig should be undertaken before building begins <li data-bbox="416 655 2042 687">11. Preservation of existing trees and hedgerows sought. <li data-bbox="416 695 2042 727">12. Development should incorporate sensitive architecture, with no flat roofs permitted. <li data-bbox="416 735 2042 863">13. Land on the edge of the site at Fanhams Hall Road (not submitted through the SLAA process), currently leased to local football club, should be included within WARE2 as part of the Masterplan process with consideration of re-location of the FC. <li data-bbox="416 871 2042 951">14. While the site lies within Wareside parish, the impact of development would be on the town of Ware. This boundary issue will need to be resolved. <li data-bbox="416 959 2042 1038">15. Service providers will incur upfront costs before development takes place – questioned whether these costs will be passed onto the existing community. <li data-bbox="416 1046 2042 1078">16. Important that the first 200 homes built do not impede creation of the relief road. <li data-bbox="416 1086 2042 1118">17. Traffic calming measures will be required during and post the development. <li data-bbox="416 1126 2042 1158">18. Adequate parking required/avoidance of displacement parking. <li data-bbox="416 1166 2042 1198">19. New cycleways needed. <li data-bbox="416 1206 2042 1286">20. Park and Ride service to the town should be provided rather than development of large car parks in the town centre. <li data-bbox="416 1294 2042 1374">21. Concern regarding the potential impact of this development and the associated infrastructure requirements on the Regional Park but strengthening of other policies elsewhere in the plan

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>should ensure the Park's assets are protected and, where appropriate, enhanced.</p> <p>22. Noted that HOU 3 allows for lower levels of Affordable Housing provision subject to the demonstration that there are sound viability reasons for doing so, such as the need to secure other infrastructure priorities.</p>
9.3 Employment in Ware	
9.3.2	<p><u>Objection</u></p> <p>1. Housing should be located on existing employment sites, such as Crane Mead before green belt land considered for development.</p>
WARE3	<p><u>Objection</u></p> <p>1. Using Green Belt designated land to create employment areas to support unsustainable and inappropriate residential development on other Green Belt designated land is not positively prepared, unjust and against National Policy</p> <p>2. Employment Areas should be retained and expanded. Object to loss of employment land for residential development.</p> <p>3. Land at Presdales Pit, Hoe Lane should be allocated as an employment site.</p> <p><u>Other Comments and Observations</u></p> <p>1. Crane Mead is changing usage from employment into housing.</p>
9.4 Retail in Ware	
9.4	<p><u>Objection</u></p> <p>1. Town centre parking already at capacity.</p> <p><u>Other Comments and Observations</u></p> <p>1. Plan should ensure new shops are viable.</p>
9.4.3	<p><u>Objection</u></p> <p>1. Providing only local shopping facilities in new development will increase traffic driving to the town centre.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	2. Providing too many shops in the new development will sever the town by splitting trade.
9.5 Leisure and Community Facilities in Ware	
9.5	<p><u>Objection</u></p> <p>1. Leisure facilities should include arts and craft.</p> <p><u>Other Comments and Observations</u></p> <p>1. Need for high quality football facilities as many of the existing pitches are of poor quality.</p> <p>2. already an under-provision of playing pitches in Ware (particularly 9 and 11 a side)</p> <p>3. plan should make it clear additional pitches will be for community use.</p> <p>4. where shared use facilities are available these need to be able to ensure long term access for community clubs.</p> <p>5. Current under provision of synthetic turf facilities, which could be provided as part of the new school (including community use).</p> <p>6. Council should be more explicit in terms of how it will ensure sufficient S106 funding is sought and then spent, which covers total costs of provision rather than the remaining funds being sought from the taxpayer.</p>
9.5.1	<p><u>Objection</u></p> <p>1. Footpaths in the area are a vital recreational and fitness resource – only way to maintain this is not to allow massive over development.</p>
9.5.3	<p><u>Objection</u></p> <p>1. While reference to the under-provision of football pitches and other sports facilities is supported, in advance of the emerging strategies for both indoor and outdoor sports facilities being completed, it is premature and inappropriate to make specific requests for sites to be allocated for meeting particular needs or to suggest the content of new or amended policies in the Ware chapter to address such needs.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
9.5.5	<p data-bbox="421 308 573 347"><u>Objection</u></p> <ol data-bbox="421 352 2018 517" style="list-style-type: none"><li data-bbox="421 352 2018 432">1. Expanded hospital services should be included as part of the proposals through restoration of A&E at WGC QEII and expanded services at Hertford County Hospital.<li data-bbox="421 437 2018 517">2. Insufficient healthcare provision planned to cope with existing failing health and hospital services. These should be planned for and timescales for delivery stated.

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Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
10.1 Introduction	
10.1	<u>Objection</u> 1. There is no section in the Plan that considers the infrastructure in villages. The IDP should also refer to infrastructure requirements in villages.
10.1.2	<u>Other Comments and Observations</u> 1. New village developments bring incoming people who do not assimilate into the rural way of life. Leads to commuter settlements and dilution of the community.
10.1.4	<u>Objection</u> 1. This paragraph suggests housing development will only be for younger residents which is discriminatory. <u>Other Comments and Observations</u> 1. Facilities have closed for a number of reasons. New development won't bring them back.
10.2 Development in Villages	
10.2	<u>Support</u> 1. Support expressed for the principle of the policy. <u>Objection</u> 1. The housing requirement for at least 500 dwellings to be delivered in the villages is too restrictive and will fail to deliver sufficient rural housing to meet housing needs. 2. Villages should provide 1,500 dwellings in total. 3. Query as to the likelihood of the figure for villages being met when specific sites are not allocated for development. 4. Objection to the methodology used in the Village Hierarchy Study. The existing population of the villages or location of employment areas has not been considered in the assessment and

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>constraints to development haven't been considered appropriately.</p> <ol style="list-style-type: none"> 5. Village Hierarchy Study doesn't consider 'village clusters'. 6. Many villages are unsustainable locations for further development. 7. Concern that villages are developing into small towns. 8. Concern over the lack of infrastructure in villages. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Query as to why village hierarchy has changed from the preferred options version of the Plan. 2. Road infrastructure needs to be improved in villages so that they are able to cope with additional traffic.
10.2.1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Villages will die as vibrant communities as facilities will not be supported without growth. 2. People do not always need to live in urban areas as home working has become more feasible
VILL1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy does not adequately provide for growth in villages. 2. The Sustainability Appraisal does not satisfactorily consider the reasonable alternative distribution of a greater amount of development to the villages. 3. The growth figure of 'at least 10% increase in housing stock' is arbitrary and unjustified. 4. The application of a blanket 10% growth figure for Group 1 Villages in the Rural Area beyond the Green Belt fails to take into consideration the unique character of different villages. 5. Villages should not be grouped together in three categories; each village should be looked at individually to see if it contains the right characteristics for development. 6. Giving a housing requirement to the villages will lead to speculative development on village boundaries. 7. Site allocations, with specified numbers of dwellings to be delivered, should be made in Group 1 Villages to provide certainty of development.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>8. Allocations should not be devolved to Neighbourhood Plans as there is no obligation on Parish Councils to produce a Neighbourhood Plan.</p> <p>9. Part III of the policy is unsound as Green Belt boundaries cannot be altered through Neighbourhood Plans. Changes to Green Belt boundaries are a strategic matter which should be addressed through the District Plan rather than delegated to Neighbourhood Plans.</p> <p>10. Object as there is no mention in the policy to the essential requirement for the demonstration of exceptional circumstances to justify Green Belt alterations.</p> <p>11. Part VII of the policy is too subjective.</p> <p>12. Part VII of the policy should be amended to make reference to development proposals seeking to optimise dwelling provision. Low density housing development should be discouraged.</p> <p><u>Other Comments and Observations</u></p> <p>1. Query as to how 10% figure was reached for development in Group 1 Villages.</p> <p>2. Query as to how development will be phased over the Plan period.</p> <p>3. Query as to how infrastructure capacity will be determined if villages exceed their minimum housing number.</p>
VILL2	<p><u>Support</u></p> <p>1. Support expressed for Part II and Part III of the policy.</p> <p><u>Objection</u></p> <p>1. Policy is too restrictive with regard to only permitting infill development in Group 2 Villages.</p> <p>2. Group 2 Villages should be allocated a specific housing target.</p> <p>3. Limited infilling should be defined.</p> <p>4. Suggest modification to policy to permit small scale development in Group 2 Villages with a good range of public transport services.</p> <p>5. Suggest modification to permit the partial or complete redevelopment of brownfield land or small extensions to the settlement boundary where the scheme is providing affordable housing</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>as part of a rural exception scheme.</p> <p>6. Policy just adds more development to the edges of Group 2 Villages which do not have the infrastructure to cope.</p> <p>7. Part IV of the policy is too subjective.</p>
VILL3	<p><u>Objection</u></p> <p>1. No guarantee that Neighbourhood Plans will be bought forward which would prevent any development in Group 3 Villages.</p> <p>2. More emphasis needs to be given to the redevelopment of brownfield sites in Group 3 Villages.</p> <p>3. Only permitting limited infilling in these villages will reinforce the lack of sustainability and will deliver no community benefits.</p> <p>4. Part III of the policy is too subjective.</p> <p><u>Other Comments and Observations</u></p> <p>1. A Neighbourhood Plan Group would be able to define a development area in a Group 3 Village in a less restricted manner than it could within a Group 2 Village.</p> <p>2. Further clarity is required as to what a Group 3 Village is.</p>
10.3 Village Development Boundaries	
10.3.1 & 10.3.2	<p><u>Objection</u></p> <p>1. Limited number of infill sites have been identified within existing village boundaries meaning it is unlikely sufficient development will come forward to meet housing need. Sites on the edge of villages should be permitted.</p> <p>2. Fixed development boundaries seek to unduly restrict development. This is contrary to the NPPF which only seeks to restrict the development of isolated dwellings in the countryside.</p> <p>3. Group 1 Villages should not have development boundaries drawn around them.</p> <p>4. Development adjacent to a Group 2 Village boundary should not be automatically deemed appropriate.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	5. Development boundaries should be deleted for villages washed over by the Green Belt and the NPPF should be used to determine sustainable development. 6. Sites which have had recent planning approvals have been excluded from the development boundaries. 7. Objection to village boundaries due to exclusion of land/specific sites.
10.3.3	<u>Objection</u> 1. Encouraging villages to make amendments to the Green Belt boundary is unsound. 2. Restriction on Group 2 Villages located in the Green Belt to alter their development boundaries is unduly restrictive and must be removed for the plan to be in line with the NPPF.
10.4 Neighbourhood Plans	
VILL4	<u>Objection</u> 1. No guarantee that Neighbourhood Plans will be bought forward which would restrict development in the rural area. Site allocations, with specified numbers of dwellings to be delivered, should be made to provide certainty of development. 2. There is no appropriate mechanism for delivery of development in villages where communities choose not to produce a Neighbourhood Plan. 3. Policy cannot be relied upon to deliver 500 dwellings so this figure should not be included in the housing trajectory. 4. Development of Neighbourhood Plans can take many years and does not offer a short or medium prospect of delivery of housing, and may result in the Council being unable to maintain a 5 year housing supply. 5. Policy seems to set a ceiling of 500 dwellings to be bought forward in the villages. 6. Concern that there will be no intervention by the Council in the event of under delivery of housing until 2022 at the earliest. 7. The monitoring and review process enshrined in Parts II and III of the policy are too time

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>consuming and will lead to a failure of the Plan to meet the housing target. Suggested modification to state that where monitoring demonstrates a shortfall in delivery, the presumption in favour of sustainable development will apply.</p> <p>8. Object to the District Council allocating sites for development in villages as this does not take into account the unique character of villages.</p> <p>9. Neighbourhood Plans should be allowed to amend village development boundaries.</p> <p><u>Other Comments and Observations</u></p> <p>1. The Local Education Authority need to be involved at the early stage of Neighbourhood Plan preparation to ensure there are enough local school places to meet demand.</p> <p>2. Clarification is required regarding a discrepancy between the wording of VILL4 and DPS3.</p> <p>3. Difficulty highlighted of bringing forward sites in a Neighbourhood Plan that straddle two adjacent parish areas.</p>
10.6 Retail, Leisure and Community Facilities in the Villages	
10.6	<p><u>Objection</u></p> <p>1. There are no plans to facilitate the introduction of new facilities to villages if existing facilities are lost</p>
Village Specific Comments	
Anstey	
	<p><u>Objection</u></p> <p>1. Objection to village categorisation. Anstey should be identified as a Group 3 Village.</p>
Aston	
	<p><u>Objection</u></p> <p>1. Objection to development boundary.</p> <p>2. Green Belt criteria should be used to determine appropriate boundary.</p> <p>3. Aston will be unable to meet its housing need.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<u>Other Comments and Observations</u> 1. Specific sites proposed for development.
Bayford	
	<u>Objection</u> 1. Query regarding Group 2 categorisation considering its access to a rail station.
Brickendon	
	<u>Objection</u> 1. Query regarding Group 2 categorisation considering its access to Bayford rail station.
Birch Green	
	<u>Support</u> 1. Support village categorisation. <u>Objection</u> 1. Villages 'washed over' by the Green Belt do not require development boundaries. 2. Objection to development boundary.
Bramfield	
	<u>Objection</u> 1. Objection to village categorisation. Bramfield should be identified as a Group 3 Village.
Braughing	
	<u>Support</u> 1. Support village categorisation. 2. Support minimum housing requirement of 35 dwellings. <u>Objection</u> 1. Objection to village categorisation. <u>Other Comments and Observations</u> 1. Specific sites proposed for development.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	2. The village school could be expanded. 3. Concern about impact of development on sites of archaeological importance. 4. Air pollution issues due to lorry movements on B1368.
Colliers End	
	<u>Objection</u> 1. Objection to development boundary
Cottered	
	<u>Objection</u> 1. Objection to development boundary. <u>Other Comments and Observations</u> 1. Specific sites proposed for development.
Dane End	
	<u>Objection</u> 1. Objection to development boundary.
Datchworth	
	<u>Support</u> 1. Support village categorisation. <u>Objection</u> 1. Objection to development boundary.
Great Amwell	
	<u>Support</u> 1. Support village categorisation. <u>Objection</u> 1. Objection to development boundary. <u>Other Comments and Observations</u>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	1. Specific sites proposed for development.
Hadham Ford	
	<u>Support</u> 1. Support village categorisation. <u>Objection</u> 1. Site allocations should be made in the village to meet local housing need. 2. Objection to development boundary. 3. Objection to village categorisation. Hadham Ford should be identified as a Group 1 Village. 4. Small scale development should be permitted in the village. <u>Other Comments and Observations</u> 1. Specific sites proposed for development. 2. Query regarding the village being called Hadham Ford rather than The Ford.
Hebing End	
	<u>Objection</u> 1. Objection to village categorisation. The village should be included as part of the categorisation of Benington as a Group 2 Village.
Hertford Heath	
	<u>Other Comments and Observations</u> 1. Specific sites proposed for development. 2. No capacity to expand village school.
High Cross	
	<u>Support</u> 1. Support village categorisation. <u>Objection</u> 1. Village should not be constrained in terms of growth as it is not in the Green Belt and has good

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>access to higher order settlements.</p> <ol style="list-style-type: none"> 2. Objection to village categorisation. High Cross should be identified as a Group 1 Village. 3. Objection to village categorisation. Employment area and newly created open space in the village should be taken into consideration in assessment. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Specific sites proposed for development. 2. Well planned moderate growth in the village could bring in additional facilities which would support a Group 1 Village categorisation. 3. Considered that the school has capacity to accommodate more growth. 4. The village has already received in excess of a 35% increase in housing stock.
Hunsdon	
	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support village categorisation. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to village categorisation. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Specific sites proposed for development. 2. Village has already accommodated a 10% growth in housing stock through approved planning applications. 3. Concern that village will merge with Hunsdonbury and Widford. 4. No capacity to expand village school.
Little Berkhamstead	
	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to village categorisation. Little Berkhamstead should be identified as a Group 3 Village.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Little Hadham	
	<u>Support</u> 1. Support village categorisation. <u>Other Comments and Observations</u> 1. Query regarding the village being called Little Hadham instead of The Ashe.
Much Hadham	
	<u>Support</u> 1. Support village categorisation. <u>Other Comments and Observations</u> 1. Specific sites proposed for development. 2. No capacity to expand village school.
Spellbrook	
	<u>Objection</u> 1. Objection to development boundary. 2. Spellbrook should not be considered in isolation of Sawbridgeworth. 3. Unrealistic to expect Spellbrook to produce a Neighbourhood Plan. <u>Other Comments and Observations</u> 1. Specific sites proposed for development.
Standon and Puckeridge	
	<u>Support</u> 1. Support village categorisation. 2. Support for minimum housing requirement of 146 dwellings. <u>Objection</u> 1. Objection to development boundary. 2. Concern that the growth figure for development in the village is not capped.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>3. Village is being overdeveloped compared to other Group 1 Villages.</p> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Specific sites proposed for development. 2. No capacity to expand village school (Roger De Clare) 3. Improvements need to be made to sewerage capacity.
Stanstead Abbotts and St Margarets	
	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to village categorisation. Village should be categorised as a distinct settlement that lies between the main towns and the villages. 2. Site allocations should be made in the village. 3. Green Belt boundary around the village should be amended to accommodate development. 4. Objection to any proposed amendment to the Green Belt boundary that would encroach on Great Amwell. 5. Lack of education capacity should not be a constraint to growth. HCC has a statutory duty to provide more school places. 6. Flood risk should not be a constraint to development and meeting the housing need of the village. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Specific sites proposed for development. 2. No capacity to expand village school.
Tewin	
	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support village categorisation. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to village categorisation. Tewin should be identified as a Group 1 Village.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	2. Objection to development boundary. <u>Other Comments and Observations</u> 1. Specific sites proposed for development.
Thundridge & Wadesmill	
	<u>Support</u> 1. Support village categorisation. <u>Objection</u> 1. Objection to village categorisation. <u>Other Comments and Observations</u> 1. Specific sites proposed for development.
Walkern	
	<u>Support</u> 1. Support village categorisation. <u>Objection</u> 1. Objection to development boundary. <u>Other Comments and Observations</u> 1. Specific sites proposed for development. 2. No capacity to expand village school.
Watton-at-Stone	
	<u>Support</u> 1. Support village categorisation. 2. Support for redevelopment of brownfield sites in the village. <u>Objection</u> 1. Objection to proposals to amend the Green Belt boundary. 2. Site allocations should be made in the village.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>3. Village should deliver a full 10% increase in housing stock.</p> <p>4. Decision regarding the amount of housing to be delivered in the village should not be left to the Neighbourhood Plan.</p> <p>5. Development would damage the quality of life for local people.</p> <p>6. Development would reduce the gap between the village and Stevenage.</p> <p><u>Other Comments and Observations</u></p> <p>1. Specific sites proposed for development.</p> <p>2. The village school could be expanded.</p> <p>3. Infrastructure in the village is severely constrained.</p>
Widford	
	<p><u>Objection</u></p> <p>1. Objection to development boundary. Development boundary defining the main built up area of the village will shortly be incorrect as it omits two areas which are being/will be developed.</p> <p>2. Cricket ground should not be designated as a facility for Open Space, Sport and Recreation as it is not a public recreation facility.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
11.1 Introduction	
11.1	<u>Objection</u> 1. Support for Stop Harlow North Campaign.
11.2 Development in the Gilston Area	
11.2	<u>Support</u> 1. Support for development in this location. <u>Other Comments and Observations</u> 1. Unclear whether Gilston Park House has retained its Green Belt status. 2. The site could provide for a greater proportion of the District's housing needs and ease pressure on other areas.
11.2.4	<u>Objection</u> 1. Not clear how a new Junction 7a on M11 will alleviate wider transport issues in this location. 2. Concern over increased traffic use of C161 (Eastwick Road) and surrounding roads, including rat-running through nearby villages. <u>Other Comments and Observations</u> 1. This paragraph and Policy GA1, Part III, may need to be updated should further transport modelling demonstrate a need for a Harlow Northern Bypass. This may also lead to a need to review the plan.
Figure 11.1	<u>Objection</u> 1. Other land in this area should be removed from the Green Belt and included as part of the site. 2. Concern that the Green Belt boundary has been drawn around land ownership rather than

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>using NPPF advice.</p> <p>3. The reference to a single neighbourhood centre is not reflective of the approach to create 7 individual villages.</p>
GA1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for reference to provision of indoor and outdoor sports facilities. 2. Support for development in this location. 3. Support for community ownership and stewardship of assets. Suggested additional wording to reflect this principle in the policy. 4. Development could be provided earlier on in this location. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The technical work required to justify changing the site from a Broad Location to an allocation has not been undertaken. 2. The Council has failed to consult on a version of the Plan that includes the Gilston Area as an allocation. 3. Exceptional Circumstances have not been demonstrated to allow Green Belt release. 4. Development will lead to the coalescence of existing villages with Harlow. 5. Development would destroy Gibberd's countryside setting. 6. Lack of detail in the Infrastructure Delivery Plan. 7. The proposed infrastructure schemes are unfunded and will not be sufficient/lack of capacity with existing infrastructure such as GP surgeries, schools and hospitals. 8. Infrastructure needs to be provided up front in order to avoid additional pressures on adjacent settlements. 9. There is no agreement in place between the developers and HCC with regards education and transport, or CCG/NHS in terms of health. 10. Lack of contingency planning should key infrastructure schemes not be delivered.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> 11. Concern that there is no CIL in place in order to fund infrastructure. 12. The proposals will threaten SSSI's, wildlife sites and the natural environment. 13. Concern regarding the capacity of Rye Meads STW. 14. Proximity to flood zones and strain on the sewerage system may lead to contamination of waterways. 15. The area should be used as an area of actively managed countryside. 16. Concern regarding traffic congestion. 17. Other suitable alternatives have not been explored sufficiently. 18. It is not clear how the development will support the regeneration of Harlow. 19. Princess Alexandra Hospital is already under severe pressure. 20. The houses won't be occupied by East Herts residents. 21. The development will lead to this area and surroundings becoming part of Essex. 22. Concern regarding air quality. 23. Impact on historic assets/need for a Heritage Impact Assessment. 24. Impact on the character of the area generally. 25. School provision for both primary and secondary education needs to be 20FE for each based on 1FE per 500 dwellings. 26. Brownfield sites should be re-developed first in order to avoid building on Green Belt. 27. Insufficient rail capacity. 28. Loss of agricultural land. 29. Concern regarding utilities including water supply/water pressure. 30. Concern regarding ability of police to cover such a large new development. 31. The reference to 7 villages is misleading. 32. Disruption to existing residents during long construction process. 33. Lack of reference to Garden City principles.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>34. Lack of detail with regards to masterplanning and infrastructure planning.</p> <p>35. The developer and the Council rejected the request from Eastwick and Gilston and Hunsdon Parish Councils for professional assistance in order to engage in collaborative working.</p> <p>36. The build out rates proposed by the developer are unrealistic, however if those levels are not reached then there is potential that required infrastructure will not be provided when needed.</p> <p>37. There is badger activity on site.</p> <p>38. Concern about parking at Harlow Town station.</p> <p>39. Potential impact on individual character of Sawbridgeworth.</p> <p>40. Lack of community involvement in draft Concept Framework/concern that the document was only produced shortly before Regulation 19 stage.</p> <p>41. Requirement to provide 40% affordable housing would not be viable. The policy should require 30%.</p> <p>42. Provision of 15 Gypsy and Traveller pitches and 8 Travelling Showpeople's plots is excessive given needs in Plan period will be met elsewhere.</p> <p>43. Part (l) is too prescriptive with regards to the proposed sustainable transport corridor.</p> <p>44. The text should be updated to reflect the fact that the potential re-location of Princess Alexandra Hospital would not form part of the Gilston Area.</p> <p>45. The need for a Harlow Northern Bypass, as mentioned in the Settlement Appraisal, is not accepted.</p> <p>46. The policy should be re-written in order to provide 2,000-3,000 homes spread across the wider Gilston area, including around Sawbridgeworth.</p> <p>47. The Sustainability Appraisal does not consider the full impacts of providing 10,000 homes in this location, only 3,000 in the Plan period.</p> <p><u>Other Comments and Observations</u></p> <p>1. HCC, ECC and Harlow Council would like to be involved in the preparation of the Concept</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>Framework.</p> <ol style="list-style-type: none"> 2. The development should include purpose built youth facilities. 3. There is a need for cross boundary discussions (Hertfordshire and Essex) in relation to education provision. 4. Pre-school/nursery facilities should be provided as part of new schools. 5. New homes and no-residential buildings should be served by superfast broadband. 6. The wastewater network capacity in the area is unlikely to be able to support the proposed development and upgrades may be required. A detailed drainage strategy should be prepared at the planning application stage. 7. Wording changes suggested to more fully reflect the required highways schemes. 8. The policy should be updated to reflect the fact that development would contribute towards the delivery of off-site infrastructure. 9. It is unclear whether the Plan can lawfully promote development beyond the Plan period. 10. The design should ensure that the Green Wedges maintain their links beyond the Stort Valley. 11. Further discussions are required between East Herts and Harlow in order discuss how the development may help meet some of Harlow's affordable housing needs. 12. A clear transport plan that demonstrates how trips arising from the full 10,000 homes will be accommodated on the network is required. This could include reference to a Harlow Northern Bypass. 13. Further transport modelling is required in order to demonstrate what other mitigation measures are required to deliver the full 10,000 homes.
11.3 The River Stort Crossings	
GA2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Concerns about the deliverability of the crossing. The land required is not in the ownership of the developers.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>2. Impact on the Stort Valley</p> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. It should be an aspiration to deliver the second Stort crossing as soon as possible to ensure that sustainable transport offer is available at the point of occupation. 2. The route of the Second Crossing should join with River Way in Harlow and not Elizabeth Way. 3. It could be helpful to indicate the preferred route of the second crossing on the Key Diagram.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
12.1 Introduction	
12.1	<u>Objection</u> 1. Inadequate healthcare facilities to accommodate existing and new population 2. Stevenage has lost lots of employers so no longer thriving.
12.2 Development East of Stevenage	
12.2	<u>Objection</u> 1. No release of Green Belt should occur – no evidence of exceptional circumstances 2. Site breaches Gresley Way which is a clear boundary 3. Sets precedence for future development 4. Objection to Travelling Showpeople site 5. Reinstating the secondary school within Stevenage will have implications for other schools
12.2.3	<u>Objection</u> 1. Reinstating the secondary school within Stevenage will have implications for other schools 2. Required schools and community infrastructure will not come forward with development or at all 3. Secondary schools are too far for children to walk (safety concerns)
12.2.4	<u>Objection</u> 1. Will cause congestion and rat running on rural road network and Stevenage road network 2. Impact on road network needs to be properly modelled and assessed 3. Limited public transport serving this area, including bus access to schools 4. Concern about the highway safety of Gresley Way 5. Increase in vehicles will cause impact on air quality 6. Site is too far away from town centre or station to walk or cycle

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	7. Site is disconnected from footpath and cycle network 8. Capacity concerns on the rail network 9. Travelling Showpeople vehicle movements will cause traffic problems
12.2.5	<u>Objection</u> 1. Proposed roundabouts will not mitigate traffic issues caused
12.2.6	<u>Objection</u> 1. Lack of healthcare provision and capacity of Lister Hospital
12.2.8	<u>Objection</u> 1. Will cause coalescence with neighbouring settlements and reduce gaps, impacting on the character of villages. 2. Unacceptable impact on the Beane valley – visual, environmental, light pollution and on the tranquillity of the valley, harm to wildlife such as Red Kites and Sky Larks. 3. Planting will not screen the site for many years, development will be visible from across the valley
Figure 12.1	<u>Other Comments and Observations</u> 1. Diagram incorrectly shows land to south-west of the site as country park/green space – should be Green Belt and Local Wildlife Site.
Policy EOS1 Land East of Stevenage	
EOS1	<u>Objection</u> 1. Lack of transport modelling to support the Plan – cumulative assessment not considered. 2. No Green Belt study to support release of this site 3. Site was brought in following the preferred options stage to contribute to meeting first five years of development. 4. There has been no consultation on this site 5. No exceptional circumstances for this site

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> 6. Site does not meet East Herts' needs which is in the south and east of the District 7. Infrastructure required is not costed, therefore question the deliverability of the development 8. Masterplan does not address how pedestrians, cyclists and equestrians will cross Gresley Way. 9. Site cannot be delivered within the first five years of the Plan – build out rate considered unachievable by other site promoters 10. Site will not deliver necessary community facilities 11. Site will not deliver highway mitigation 12. Stevenage Bus 1 will not provide sufficient route options. 13. A602/Gresley Way junction will need to be improved 14. Existing Stevenage infrastructure cannot cope – impacts need to be assessed 15. East Herts will need to determine if education needs can be met 16. Land west of Stevenage is more appropriate 17. Previous applications in location have been rejected 18. Site cannot sustain a local centre or other facilities 19. Object to travellers site – numerous anti-social issues raised and impact on ability to create a high quality urban extension 20. Site is not big enough to accommodate traveller site – should not cut down trees to accommodate this use 21. Aston Parish Plan has been ignored 22. Site will be disconnected from existing community 23. Site does not provide a sufficiently robust Green Belt boundary once Gresley Way is breached 24. Will have a detrimental impact on Box Wood/New Wood 25. Loss of trees to create access 26. Construction stage will harm the Beane valley

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>27. Impact on water supply 28. Detrimental to reintroduction of water voles to the river Beane 29. Will increase flooding in Walkern 30. Badger sets may be disturbed 31. Horse riders and equestrian businesses will be negatively affected.</p> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. The North Herts District Plan does not make sufficient secondary education provision to serve development to the north of the town, which is required to meet the needs of the Stevenage Education Planning Area. 2. A detailed drainage strategy will be required to assess the wastewater capacity in this area. 3. Stevenage residents should have been consulted 4. Stevenage Borough Council is pressurising East Herts Council 5. Stevenage Borough Council has no dependency on East Herts 6. Adjacent land owner recommends site should be expanded to include their land to provide total of 1,500 homes (900 up to 2033) 7. Stevenage town centre needs regeneration 8. New neighbourhood centre should be located on Gresley Way 9. The site should meet Stevenage’s neighbourhood and design principles, and do not agree with the Hertfordshire Design Review Panel recommendations.
Figure 12.3	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The site boundary should be enlarged to deliver a greater quantum of development. Adjacent site 43/003 is also proposed to meet shortfall <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. The diagram key is incorrectly labelled “enhancement to road network” – should be

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	“enhancement to rights of way network” 2. Diagram key terminology needs to be consistent – refer to community facilities/neighbourhood centre consistent with figure 12.1.

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Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
13.1 Introduction	
13.1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to the intention to have a collaborative joint masterplanning approach which is then taken through to a formal SPD – will add unnecessary financial burdens and delay. Suggest new wording to this effect <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Lack of consultation with stakeholders such as The Welwyn Garden City Society, Friends of Panshanger Park and Hertfordshire Gardens Trust 2. Local community were not consulted 3. An amendment to the Policy Map is suggested due to an incorrectly defined Local Wildlife Site
13.2 Development East of Welwyn Garden City	
13.2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Loss of Green Belt – no evidence of exceptional circumstances
13.2.9	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Impact on congestion on A414 and local roads
13.2.10	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Concern over capacity of healthcare services – only a minor injuries unit at the former QEII hospital
13.2.13	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Inconsistency between East Herts and Welwyn Hatfield Plans in text

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Policy EWGC1 Land East of Welwyn Garden City	
EWGC1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support intended sustainable transport measures 2. Support for intended sustainable drainage measures 3. Support for intended recreation uses <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The Heritage Impact Assessment has not considered all necessary areas and no specific mitigation is committed in the policy to address the HIA 2. Policy should require a three form entry primary school 3. Reference to an all through school should be removed as it has not been decided how the education facility should come forward 4. Preference cited for two adjacent rather than all-through schools 5. The need for eight forms of entry at secondary level is questioned as the proposal would require five forms. S106 requirements should be proportionate to the development. They also question the amount of land required for the secondary school (8-10 ha for secondary school of 5-6fe and 2.5ha for 3fe primary). More land than this would impact on viability. 6. Objection to development immediately west of the A414 – impact on heritage assets, contrary to Policy HA8 Historic Parks and Gardens, impact on Hatfield House and estate and Panshanger Park, needs a full archaeological appraisal 7. Visual impact and impact on landscape grounds, including on views of river corridors 8. Impact on green infrastructure, environmental assets, wildlife including badgers, river corridor, open rural landscape, needs a full ecological appraisal, soil erosion impacting on river Mimram, need for network of reed bed marshes, existing woodlands becoming sterile 9. Lack of green infrastructure / contradiction to Welwyn Hatfield Green Corridor plans

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>10. Will cause flooding downstream and risks of water pollution</p> <p>11. Concern regarding water abstraction and resultant river health</p> <p>12. Lack of integration to the existing town</p> <p>13. Presence of contaminated land – prejudicing development and open space use, harmful to human health, leaching of contaminants to adjacent non-filled land, unrecorded tipping beyond known landfill site</p> <p>14. Noise and air pollution caused by the development</p> <p>15. Use of Gascoyne Cecil Estate land as a buffer zone between the site and Panshanger Park</p> <p>16. Much reduced area of land proposed as an alternative for consideration.</p> <p>17. Green Belt loss – no exceptional circumstances evidenced</p> <p>18. Does not meet the needs arising from Hertford</p> <p>19. Will cause coalescence between Hertford and Welwyn Garden City</p> <p>20. Lack of evidence for Gypsy and Traveller needs – proximity of existing site</p> <p>21. Conflict with proximity of homes to household waste site</p> <p>22. Uncertainty over deliverability of required mitigation measures and responsibility for future maintenance</p> <p>23. Fails Duty to Co-operate as no engagement with Welwyn Hatfield Borough Council</p> <p>24. Fails Duty to Co-operate with Hertingfordbury Neighbourhood Plan Group</p> <p>25. No consultation on mineral extraction</p> <p>26. Impact of new homes adjacent to mineral extraction plant</p> <p>27. Cannot meet Garden City principles</p> <p>28. Impact on existing town’s infrastructure</p> <p>29. Impact on neighbouring residential areas</p> <p>30. Impact on road network and ability to access the site</p> <p>31. Too far from town centre and station</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>32. Over-reliance on assumption that people will use non-car modes of transport 33. Rural bus network is poor 34. Land south of B195 is not available for development 35. Does not meet needs of the LSCC corridor 36. Amendment to Policy is suggested to reflect their proposed masterplan and concept statement</p> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. A detailed drainage strategy will be required to assess the wastewater capacity in this area. 2. Inconsistency between the policies in the East Herts and Welwyn Hatfield Plans – open spaces 3. New wording requested with regards to green infrastructure (consistent with WHBC local plan) 4. Clear map should be provide for proposed footpaths and links 5. Policy requires amendment to appropriately deal with known mineral reserves 6. Policy requires amendment to appropriately deal with safeguarded waste recycling facilities 7. Need to ensure adequate provision of open spaces and leisure facilities
Figure 13.2 Strategy Diagram	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for designation of Eco-Aggregates site as employment land <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Figure 13.2 Strategy Diagram should be replaced with the equivalent from the WHBC Plan <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Error in location of waste management facility symbol 2. Omits new traveller site

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Policy Map	<u>Other Comments and Observations</u> 1. Scale should be the same for WHBC Local Plan and East Herts District Plan

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Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
14.1 Introduction	
14.1	<u>Other Comments and Observations</u> 1. Query as to what the Council has done to bring empty homes back into use. Council should acquire properties using compulsory purchase powers.
14.2 Type and Mix of Housing	
14.2	<u>Other Comments and Observations</u> 1. The use of pre-fabricated housing should be encouraged to speed up building and reduce the cost.
14.2.1	<u>Objection</u> 1. Object to reference to paragraph 47 of the NPPF not including the full wording. Suggest modification to text to include 'as far as this is consistent with the policies set out in this Framework'.
14.2.2	<u>Other Comments and Observations</u> 1. The NPPF should be added to the list of documents that housing requirements will be informed by.
HOU1	<u>Support</u> 1. Policy provides sufficient flexibility to allow sites to respond to local requirements, such as local character, in providing an appropriate mix of housing. 2. Support expressed for policy as it recognises the need for the provision of specialist housing. <u>Objection</u> 1. Requirement for small development sites to provide a mix of housing tenures, types and sizes is interference in the housing market and may impact on viability. 2. Mix of housing on each site should be determined on a site-by-site basis and should vary

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>depending on the location of the development and the character of the surrounding area.</p> <ol style="list-style-type: none"> 3. There needs to be flexibility with regards to the housing mix to be provided on each site. 4. A high proportion of large homes that attract commuters should not be developed in settlements located away from railway stations to minimise car travel. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Further clarity is required as to what is required in terms of affordable housing. Unclear whether affordable housing is required from sites of 5 or more dwellings. 2. Housing should be provided that caters for the needs of all sections of society.
14.3 Housing Density	
HOU2	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for flexible wording of the policy which enables development proposals to respond to local circumstances through a design-led process. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy should be promoting higher density development on sites in key locations (town centres, close to transport hubs and potentially in the proposed strategic development locations). 2. Policy is not distinctive to East Herts. 3. Policy should state what ‘high’, ‘medium’ and ‘low’ net densities would be to provide clarity. 4. Policy sets lower densities for housing development in villages but should be acknowledged that some villages have brownfield sites which should also be taken into consideration when assessing local character. 5. Policy is unclear about the approach to be taken to development of strategic sites, eg. the Gilston Area. Suggest modification to policy wording to make reference to the density work undertaken for the Gilston Area Concept Framework. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Query as to how the character of a local area will be taken into account when proposing a

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>sensitive housing density for a development.</p> <p>2. The guidelines for the density of development should not be applied rigidly.</p>
14.4 Affordability and the Housing Market	
14.4	<p><u>Objection</u></p> <p>1. Specific site promoted for allocation to help meet the identified need for affordable housing.</p>
14.4.7	<p><u>Other Comments and Observations</u></p> <p>1. A flexible approach to affordable housing tenure and mix should be adopted to ensure that affordable housing targets can be met on development schemes.</p> <p>2. Suggest modification to state that the affordable housing mix requirements may change over the lifetime of the Plan.</p>
HOU3	<p><u>Support</u></p> <p>1. Positive policy on the need for, and provision of, affordable homes.</p> <p>2. Support acknowledgment that affordable housing requirement can be subject to viability testing.</p> <p>3. Support expressed for the varying percentage requirement for affordable housing dependent on number of units delivered.</p> <p>4. Support the wording of Part II of the policy which provides flexibility for starter homes to be delivered.</p> <p><u>Objection</u></p> <p>1. Query the soundness of the assessment of affordable housing need set out in the SHMA, in that it doesn't take into account those who delay making housing plans due to affordability.</p> <p>2. The use of 'up to' in the policy wording invites developers to apply for a lower amount. A mandatory percentage should be stated in the policy.</p> <p>3. Policy wording is weak and it should be stated that the provision of less than 30% affordable housing will only be permitted in exceptional circumstances.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>4. Object as policy requires affordable housing provision on sites delivering less than 10 dwellings which isn't in accordance with national policy.</p> <p>5. Object to the calculation of affordable housing being based on gross supply rather than net additions.</p> <p>6. Part II of policy should be amended to state that the affordable housing mix sought will reflect the housing need at the point of determining a planning application.</p> <p>7. Policy should state how affordable homes will remain affordable in perpetuity.</p> <p>8. Object to policy seeking to retain affordable housing as affordable in perpetuity as this fails to recognise the amendments proposed to the definition of affordable housing in the NPPF.</p> <p>9. Lower provision of affordable housing should be made on developments located more than 2 miles from a railway station.</p> <p>10. Object to the reference to 'pepper-potted' as this can cause a range of management challenges. Suggest modification to make reference to 'clustering' instead.</p> <p><u>Other Comments and Observations</u></p> <p>1. Change to national policy, such as extension of Right to Buy, will negatively affect supply of affordable homes.</p> <p>2. Concern expressed that 'affordable housing' is unaffordable for many people.</p> <p>3. Plan needs to take account of how the policies adopted by the Council can influence the migration trends identified in the SHMA.</p> <p>4. Policy could be improved by providing detail and seeking specific provision of key worker housing.</p> <p>5. Developers should be prevented from selling affordable housing to London Councils.</p> <p>6. Affordable housing should be used for local requirements and should not be allocated to other authorities.</p>
14.6 Rural Exception Sites	

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
HOU4	<u>Objection</u> 1. Policy makes no reference to Green Belt policy. This should be included as a criterion in the policy. 2. Object to Part IV of policy as there is no legislation in place to prevent dwellings being sold on the open market in 5 years.
14.8 Housing for Older and Vulnerable People	
14.8.2	<u>Objection</u> 1. Better reference should be made to the fact that vulnerable people includes people with learning disabilities. Suggest modification to split reference to the elderly, people with disabilities and vulnerable people.
14.8.5	<u>Objection</u> 1. No reference is made to the identified housing needs of people with disabilities or other vulnerable groups.
14.8.6	<u>Objection</u> 1. Suggest reference is made to the need for C3 specialist accommodation to meet the housing needs of vulnerable people, eg. supported housing schemes.
HOU6	<u>Support</u> 1. Support expressed for principle of policy. <u>Objection</u> 1. Policy does not allocate sites to ensure the delivery of 530 bedspaces (Use Class C2). 2. Policy should make specific reference to vulnerable people as the policy currently only provides for older peoples housing needs. Suggest modification to the policy to state that in addition to the overall housing target , provision should be made for the housing needs of those vulnerable people who require C3 including C3(b) homes. <u>Other Comments and Observations</u>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<ol style="list-style-type: none"> 1. An appropriate definition is required (whether in the policy or in the glossary) that defines vulnerable people in the context of this policy. 2. Specific site promoted for the delivery of specialist housing in the form of retirement homes.
HOU7	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support the flexibility of Part I(b) of the policy as it doesn't require a specific percentage of wheelchair user dwellings to be delivered. <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Object to the reference to Building Regulations Requirements in the policy as the Government warns against including reference to non-planning legislation. 2. Unable to locate any compelling evidence for the need for these optional standards. Council needs to demonstrate the necessity for this policy requirement. 3. Policy lacks clarity as little guidance with regards to the quantum of housing that will be required to meet the Building Regulations Requirement M4(3) Category 3 – Wheelchair User Dwellings. 4. Suggest modification to state that compliance with this policy will be required where there is evidence of local demand. 5. The assessment of Plan viability has not considered the viability implication of requiring compliance with the Part M optional technical standards.
14.9 Self-Build and Custom Build Housing	
HOU8	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. No evidence within the SHMA to indicate demand for 5% of plots to be allocated for self-builders. 2. Imposing a strict percentage requirement for self-build plots will impact efficient delivery of housing. 3. The requirement for 5% of plots to be allocated for self-builders is not appropriate for larger,

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>strategic sites.</p> <ol style="list-style-type: none"> 4. Suggest modification to state that the appropriate proportion of self-build plots will be determined having regard to the overall housing mix of the development. 5. Self-build housing plots should be delivered through the allocation of smaller designated sites allocated specifically for self-build, rather than as part of a larger site. 6. The requirement for large sites to supply 5% of plots to self-builders will hinder the delivery of a comprehensive and holistic development, particularly with regard to design. For example, the delivery of self-build plots would not be feasible on a site suitable for higher density flatted development. 7. Object as the development of self-build plots as part of a larger site will significantly increase development costs, and may negatively impact the sale prices of houses, compromising overall viability of the development. 8. Object as it would compromise the security of a development site and the safety of on-site workers. 9. Suggest deletion of Part III of policy as prospective self-builders may be put off by a three year time limit for completion. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Unclear whether the delivery of self-build plots counts towards the affordable housing provision required on a site.
14.10 Gypsies and Travellers and Travelling Showpeople	
HOU9	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Policy considered to be sound and will meet the district's identified need for Gypsies and Travellers and Travelling Showpeople. 2. Assessment of need considered robust and thorough. 3. Support for Part (h), but strengthening of Policy by specifying "all highly vulnerable

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>development is located in Flood Zone 1” suggested.</p> <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Discrepancy between pitch provision numbers of EHC and WHBC. The lack of collaboration in assessment of needs in each authority results in failure of the Duty to Co-operate. 2. Due to in-principle Green Belt policy objection to allocations at EWEL1, EOS1, GA1, and WARE2, consequential removal of pitches and plots for Gypsies and Travellers and Travelling Showpeople identified at these locations is sought. 3. Objection to siting of Gypsy and Traveller site within 400m of existing Holwell Site and 2 miles from Barbaraville Site as contradicting DGLG guidance. 4. Neither EH or WHD council approached any of the settled community near existing sites in undertaking their assessments. 5. Situating a Gypsy and Traveller site in the Green Belt contrary to national policy. 6. As Gypsy and Traveller sites “should not dominate the settled community” and the Holwell site is already considered to dominate settled community of 17 properties, adding another 15 pitches nearby would be contrary to policy and, suggested, illegal. 7. Proposed new site at EWEL1 will be adjacent to housing development. No evidence that Gypsies would favour this or vice versa. The Plan lacks a robust assessment with the gypsy community. Council is not showing evidence of engagement with hard to reach communities. 8. Huge discrepancy between the pitch provision numbers being promoted in WHBC’s Plan and EHC’s Plan. WHBC has stated a need of 61 additional pitches. Duty to Co-operate has failed because there was no collaboration on assessment of need. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Continued monitoring of Gypsy and Traveller accommodation within the District, including the number of unauthorised sites and vacant sites, along with the monitoring of the five year supply of gypsy and traveller accommodation through the Annual Monitoring Report requested.

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14.12 Replacement Buildings in the Green Belt and the Rural Area beyond the Green Belt	
14.12.1	<u>Other Comments and Observations</u> 1. When considering proposals for replacement dwellings, Council should allow previously granted planning permissions and unexpended permitted development rights to be included in the overall house size allowable.
14.13 Extensions and Alterations to Dwellings and Residential Outbuildings	
HOU11	<u>Objection</u> 1. Policy is unnecessary in light of General Permitted Development Order. 2. Concern that there is no provision for large houses to be converted into multiple smaller units.
14.15 Residential Annexes	
HOU13	<u>Other Comments and Observations</u> 1. Policy is important given the shortage in suitable housing for the elderly and vulnerable people.

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Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
15.2 Economic Development	
15.2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Dispute growth of Stansted Airport – on 35 million passengers per annum growth by 2030 with only additional 5000 jobs created 2. No clear evidence of jobs growth increasing housing need 3. Contrary to para 51 of NPPF to approve change of employment to residential – this would reduce need for Green Belt development
Policy ED1 Employment	
ED1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. General support for policy <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Employment land should be designated for residential development 2. Retail uses should be included in permissible changes of use 3. Requirement for 12 months marketing evidence unreasonable – should consider market condition reports 4. Landlords are preventing local businesses from operating and applying for residential use 5. Policy is superseded by Permitted Development Order 6. Policy is contrary to HERT2 Mead Lane Area 7. Hertford Holdings consider sites on the edge of Hertford would be more attractive to businesses, existing Hertford Industrial Estate/ Caxton Hill should be allowed to convert to residential.

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	<p>8. Policy should be explicit about role of public/private partnerships in delivering employment opportunities</p> <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Stort Valley Industrial Estate should be considered for alternative uses including residential 2. Plan should refer to amount of floorspace needed 3. No reference to East of England Forecasting Model's job estimates 4. Promoted high order activities but not clear on implementation of this
Policy ED2 Rural Economy	
ED2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy is superseded by Permitted Development Order 2. Is inflexible and will lead to rural decline 3. Policy should be amended to recognise site allocation policies (i.e. should not apply where sites are allocated which are currently in agricultural use) 4. Policy should be amended to add more restrictions in terms of impact on rural traffic and road network 5. Lack of consultation

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Policy RTC1 Retail Development	
RTC1	<u>Objection</u> 1. Dispute use of locally set thresholds – national threshold should apply
Policy RTC3 Primary Shopping Frontages	
RTC3	<u>Objection</u> 1. Policy is superseded by Permitted Development Order <u>Other Comments and Observations</u> 1. Primary Shopping Frontage in Ware should be extended to cover the Sainsbury's supermarket in Star Street
Policy RTC4 Secondary Shopping Frontages	
RTC4	<u>Objection</u> 1. Policy is superseded by Permitted Development Order
16.8 District Centres, Local Parades and Individual Shops	
16.8	<u>Other Comments and Observations</u> 1. Omission of local parade in Standon 2. Omission of two new centres to be provided at Bishop's Stortford North 3. Neighbourhood centres in site allocations East of Welwyn Garden City, East of Stevenage, Bishop's Stortford South and North and East of Ware are unsound related to their general objection to Green Belt sites

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Policy RTC5 District Centres, Neighbourhood Centres, Local Parades and Individual Shops	
RTC5	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy is superseded by Permitted Development Order 2. Dispute inclusion of the White Hart PH in local parade allocation in Puckeridge <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Policy should be cross-referenced to Policy CFLR8 Loss of Community Facilities, rather than CFLR7 Provision of Community Facilities

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
17.3 Sustainable Design	
17.3.6	<u>Other Comments and Observations</u> 1. Amendment required to clarify that the BRE Home Quality Mark replaced the Code for Sustainable Homes not Building for Life
17.7 Local Character and Amenity	
17.7.7	<u>Objection</u> 1. Taller buildings are not “often suited to key locations such as...the end of vistas or parks” – could harm the setting and significance of historic parks and gardens <u>Other Comments and Observations</u> 1. Description of rural landscape is poor – should state “the Woodland Trust estimates that woodland in East Herts accounts for 9.8% of total land cover” 2. 11 ancient woodlands are under threat (not a %) – no evidence of this assertion 3. Hedgerows do not always represent enclosure 4. Should refer to Hedgerow Regulations not Legislation 5. Minor wording changes proposed for clarification
17.7.10	<u>Other Comments and Observations</u> 1. Minor wording changes proposed for clarification
17.7.11	<u>Support</u> 1. The Environment Agency supports this statement, in particular reference to buffer zones and

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	invasive species
17.7.13	<u>Other Comments and Observations</u> 1. Minor wording changes proposed for clarification – removal of reference to existing trees and hedgerows
17.7.15	<u>Other Comments and Observations</u> 1. Minor wording changes proposed for clarification – addition of reference to green space infrastructure
17.7.19	<u>Other Comments and Observations</u> 1. Aspiration 6 could include community orchards
17.7.20	<u>Other Comments and Observations</u> 1. Reference to Dementia Friendly communities could be added
Policy DES1 Landscape Character	
DES1	<u>Objection</u> 1. Policy adds no value than NPPF policy 2. Reference to the Landscape Character Appraisal SPD should be removed as standards should be set out in the District Plan
Policy DES2 Landscaping	
DES2	<u>Support</u> 1. Environment Agency strongly support this policy

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Objection</u> 1. Policy adds no value than NPPF policy</p> <p><u>Other Comments and Observations</u> 1. Minor wording changes proposed for clarification – advisory statements regarding mitigation</p>
Policy DES3 Design of Development	
DES3	<p><u>Objection</u> 1. Policy adds no value than NPPF policy 2. Part I(d) should be amended to refer to the role and primacy of Building Regulations – may be unviable 3. Part I(e) should be amended to remove requirement for electric vehicle charging points on the site – focus this provision in public spaces</p> <p><u>Other Comments and Observations</u> 1. Buildings must not interfere with airport safeguarding zones and height restrictions may be necessary</p>
17.8 Crime and Security	
17.8.2	<p><u>Other Comments and Observations</u> 1. Secured by Design initiative is only voluntary</p>
Policy DES4 Crime and Security	
DES4	<p><u>Objection</u> 1. Policy adds no value than NPPF policy</p>

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Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Introduction	
18.1.8	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. More examples of modal shift initiatives required i.e. Smarter Choices, readily accessible public transport information, working from home, and car clubs. 2. Reference required re delivery/monitoring of Travel Plans and responsibility for provision. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Questioned whether travel plans fall within Developer Contributions (paragraphs 25.3 & 25.4 Monitoring), in terms of targets set, monitoring and delivery obligations.
Sustainable Transport	
18.2	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. No clear District wide strategy to increase cycling.
18.2.1	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Point 6 should refer to wider air quality issues to accentuate health benefits of sustainable transport. 2. Point 6 should cross reference Policy EQ4. <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Questioned how sustainable transport provision is being factored into development planning. 2. Details of Sustainable Transport (cycle paths/shared routes/cycle lanes) should be publically available.
TRA1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Content and approach of policy are supported, including recognition of the need to link up development with existing walking/cycling routes (in the interests of public health and sustainable travel).

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>2. Protection of existing public rights of way, cycling and equestrian routes, (including undesignated and informal routes) and need to provide suitable replacement routes if diversion is unavoidable.</p> <p>3. Inclusion of positive messages on sustainable travel and need for these to be in place as soon as occupation occurs on developments.</p> <p><u>Objection</u></p> <p>1. Policy adds nothing to NPPF and should be deleted.</p> <p>2. Inconsistent with national policy and would fail to promote the principles of sustainable development as required by paragraph 151 of the NPPF.</p> <p>3. Reference required to the need to reduce greenhouse gases.</p> <p>4. I (b) Policy should be amended to reflect not all development proposals relate to the provisions of the Transport Plan/Vision.</p> <p>5. Insufficient emphasis has been placed on the promotion of sustainable transport within the Plan and the economic advantages it can deliver to Hatfield, Hertford, St Albans, and Welwyn Garden City.</p> <p>6. Government led investment required in east-west public transport system (tram and rail initiatives) as part of improvements to east-west connections linking St Albans, Hatfield, Welwyn Garden City and Hertford.</p> <p>7. Policy should refer to encouraging innovative sustainable transport options.</p> <p>8. (c) Park and ride should be included among sustainable transport initiative options listed.</p> <p>9. Policy should include broad strategic statement regarding sustainable transport provision and the contribution it could make to the local economy.</p> <p><u>Other Comments and Observations</u></p> <p>1. (c) S.106 funding towards Community Transport Schemes are difficult to gain.</p> <p>2. Improvements to existing public transport networks should take account of services that</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	provide access to the Lee Valley Regional Park at key or primary 'gateways' such as Stanstead Abbots, Ware and across District boundary with Roydon and Rye House.
Safe and Suitable Highway Access Arrangements and Mitigation	
TRA2	<u>Objection</u> 1. Policy adds nothing to NPPF and should be deleted.
Vehicle Parking Provision	
18.4	<u>Objection</u> 1. Car parking provision should be higher in villages to reflect reliance on car travel in remote locations.
TRA3	<u>Objection</u> 1. Current 2015 parking standards are too onerous and not in accordance with NPPF paragraph 35, thereby not encouraging sustainable modes of transport. 2. Policy should be deleted as there are occasions when it may not be appropriate to insist upon minimum parking standards (e.g. when public transport is adequate).

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Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
19.1 Introduction	
19.1	<u>Other Comments and Observations</u> 1. Plan needs to consider the provision of cemeteries 2. Plan needs to consider additional social care/ mental health and medical facilities
19.1.2	<u>Support</u> 1. Support for the reference to the role that open spaces and sports facilities have in encouraging health and wellbeing
19.2 Open Space, Sport and Recreation	
19.2.3	<u>Support</u> 1. Support for reference to Sport England Guidance
19.2.4	<u>Other Comments and Observations</u> 1. The current evidence for sports and open spaces is out of date, the Plan may not deal appropriately with needs potentially identified in emerging evidence
19.2.8	<u>Support</u> 1. Support for the use of Community Use Agreements for the shared use of facilities
Policy CFLR 1 Open Space, Sport and Recreation	
CFLR1	<u>Support</u> 1. Support this policy

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Objection to the CFLR1 designation at the Bishop's Stortford Football club grounds as the grounds are not a public open space, designation would prevent future use as employment land should the club relocate and site comprises buildings and hardstanding. To meet the criteria would prohibit relocation as alternative use would be needed to fund the relocation 2. Objection to the designation of CFLR1 at Bishop's Stortford College 3. Policy should be more flexible and include reference to shared amenity space, balconies and gardens 4. Objection to designation of land at Marsh Lane, Stanstead Abbots – private ownership, not in community use
CFLR1 Part III	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Requirement to provide such facilities may impact on viability of scheme <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Amendment suggested – integration of facilities into the landscape may not in itself provide net gains to biodiversity
CFLR1 Part VI(b)	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Amendment suggested – quantity <u>and/or</u> quality, not both – development on school playing fields may be mitigated by alternative form of provision
Policy CFLR2 Local Green Space	
CFLR2	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. As Local Green Spaces have been partly designated on their wildlife value, the approach to their protection is supported, justified and sound <p><u>Objection</u></p> <ol style="list-style-type: none"> 2. Objection to the designation of CFLR2 at Bishop's Stortford College

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	3. Restrictive stance of policy will prevent land coming forward for much needed development
Policy CFLR3 Public Rights of Way	
CFLR3	<u>Support</u> 1. Support cited for this policy – seeking enhancement of the New River Cycle Route project into Hertford and Ware
CFLR4 Water Based Recreation	
CFLR4	<u>Support</u> 1. Support for this policy where it will not have an adverse impact on nature conservation interest, the character or appearance of the environment 2. The importance attributed to maintenance of ecological interests, and the approach to protection is supported, justified and sound
19.6 The Lee Valley Regional Park	
19.6.4	<u>Support</u> 1. Recognition of the Lee Valley Regional Park Authority in the Plan is welcomed <u>Other Comments and Observations</u> 1. Reference should be to Chapter 20 Natural Environment not Chapter 19
Policy CFLR5 The Lee Valley Regional Park	
19.8.2	<u>Support</u> 1. Recognition of the Lee Valley Regional Park Authority in the Plan is welcomed <u>Other Comments and Observations</u> 1. Should be consistency in approach between the East Herts District Plan and Epping Forest District Plan

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Policy CFLR6 Equine Development	
CFLR6	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support the reference to equestrian facilities 2. Importance of equine developments needing to maintain and prevent harm to ecological interests is supported 3. Approach to protection of equestrian facilities is justified and sound <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy adds no value than NPPF policy
19.8 Community Facilities	
19.8.1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. The clear definition of community facilities is welcomed
Policy CFLR7 Community Facilities	
CFLR7	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for this policy is cited 2. Support cited for this policy, particularly reference to flexible, shared use of facilities <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Not all developments should be required to deliver community facilities
CFLR7 Part III(c)	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for Part III(c) is cited <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Amendment suggested – integration of facilities into the landscape may not in itself provide net gains to biodiversity

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Policy CFLR8 Loss of Community Facilities	
CFLR8	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for the protection of community facilities <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy omits reference to viability as a reason to permit change of use
19.9 Health and Wellbeing	
19.9.9	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support the reference to Sport England Active Design Guidance
Policy CFLR9 Health and Wellbeing	
CFLR9	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support cited for this policy – web links provided for updated strategies <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Evidence should be provided to demonstrate demand for healthcare facilities <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Amendment suggested to add reference to requirement to produce a health impact assessment
Policy CFLR10 Education	
CFLR10	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support cited for this policy – new schools should be designed to meet community use 2. Policy support for new schools is welcomed 3. Support cited for the requirement for new schools to be in locations which promote sustainable travel modes

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Developers should not be expected to ensure there are sufficient school places <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Plan should reference explicitly that contributions will be collected through CIL or S106 to fund increase in educational demand 2. Plan should identify and safeguard land for school expansion when new schools are built 3. Production of a 'Planning for Schools Development Plan Document' would be useful
CFLR10 Part III(C)	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. More flexible approach to playing field demand required. May be more appropriate to share the use of existing nearby facilities

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
20.1 Introduction	
20.1	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. This chapter is supported <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Until Memorandum of Understanding is signed with the housing market partners regarding air quality at the Epping Forest Special Area of Conservation, the Plan does not adequately address the issue of cumulative effects 2. An Air quality assessment is required to assess the impact on the Rye Meads SSSI 3. HRA findings are disputed – reference to the Lee Valley Regional Park Development Framework HRA cannot be relied on to reflect latest Plan position; confusion as to which scenario is worst 4. Lee Valley Regional Park Authority need to be consulted regarding recreational pressure
20.2 Nature Conservation	
20.2	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. As the policy considers sites the chapter should be renamed Nature Conservation Sites 2. Amendment suggested to clarify which parties provide planning advice 3. Wildlife Sites should be abbreviated LWS 4. All National Nature Reserves are SSSIs
20.2.2	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. This statement is supported, particularly reference to Local Nature Partnerships

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
20.2.8	<u>Support</u> 1. This statement is supported
20.2.9	<u>Support</u> 1. This statement is endorsed <u>Objection</u> 1. Should be more distinction between sites of different importance 2. Requires rewording to be in line with the NPPF
20.2.10	<u>Support</u> 1. This statement is endorsed <u>Object</u> 1. The NPPF does not require net gains to biodiversity only where possible. Amendment required otherwise policy assumes refusal if net gain is not provided 2. No guidance that says offsetting is required for all developments with a negative impact 3. Questions whether the calculator captures full ecosystem services <u>Other Comments and Observations</u> 1. Amendment suggested to refer to a locally approved DEFRA <u>biodiversity metric</u> rather than biodiversity Impact Assessment Calculator
20.2.11	<u>Support</u> This statement is endorsed
Policy NE1 International, National and Locally Designated Nature Conservation Sites	
NE1	<u>Support</u> 1. This policy is excellent in principle

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p>2. This policy is supported</p> <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Adds no additional value to the NPPF policy 2. Should be more distinction between sites of different importance – international sites afforded greater protection 3. Reference required to geodiversity and priority habitat 4. Requires reference to protection and enhancement of soils 5. Requires reference to protecting Best and Most Versatile Agricultural Land <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Amendment suggested to refer to a locally approved DEFRA <u>biodiversity metric</u> rather than biodiversity Impact Assessment Calculator
NE1 Part II	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy is incorrect to use two tests. If site is protected under the Habitats Directive there are three tests
Policy NE2 Sites of Nature Conservation Interest (Non-Designated)	
NE2	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. This policy is supported <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Adds no additional value to the NPPF policy 2. Query effectiveness of policy in ensuring no reduction in the environmental benefits of green corridors

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Other Comments and Observations</u></p> <p>1. Amendment suggested to refer to a locally approved DEFRA <u>biodiversity metric</u> rather than biodiversity Impact Assessment Calculator</p>
20.3 Species and Habitats	
20.3	<p><u>Support</u></p> <p>1. The integration of biodiversity into the Plan is supported – a good example to follow</p> <p><u>Objection</u></p> <p>1. Concern over impact of urban extensions on known badger setts</p> <p><u>Other Comments and Observations</u></p> <p>1. A safeguarded area of 13km radius needs to remain around Stansted Airport to prevent birdstrike risks</p>
20.3.3	<p><u>Support</u></p> <p>1. This statement is excellent</p> <p><u>Other Comments and Observations</u></p> <p>1. Amendment suggested to refer to a locally approved DEFRA <u>biodiversity metric</u> rather than biodiversity Impact Assessment Calculator</p>
20.3.6	<p><u>Support</u></p> <p>1. This statement is endorsed</p> <p><u>Other Comments and Observations</u></p> <p>1. Rye Street allotments should be retained – bee species</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
20.3.13	<u>Other Comments and Observations</u> 1. Description of culverting may need further explanation – restoring the habitat i.e. de-culverting
Policy NE3 Species and Habitats	
NE3	<u>Support</u> 1. This statement is excellent and is strongly supported <u>Objection</u> 1. Adds no additional value to the NPPF policy
NE3 Part I	<u>Other Comments and Observations</u> 1. Amendment suggested to refer to a locally approved DEFRA <u>biodiversity metric</u> rather than biodiversity Impact Assessment Calculator
NE3 Part V and VI	<u>Objection</u> 1. Parts V and VI will frustrate and potentially sterilise potential development – example includes Skylarks at northern part of Bishop’s Stortford South site
NE3 Part VII	<u>Objection</u> 1. 10 metre buffer requirement is excessive and conflicts with WAT3 which requires an 8 metre buffer alongside main rivers – amendment suggested
Policy NE4 Green Infrastructure	
NE4	<u>Support</u> 1. This policy is strongly supported

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Adds no additional value to the NPPF policy 2. Query effectiveness of policy in ensuring no reduction in the environmental benefits of green corridors and meeting demands of fishing 3. Plan does not consider the implications of Stewardship schemes coming to an end 4. Does not consider the Right of Way Improvement Plan 5. Policy should require compensation, offsetting, creation of new corridors and measures to identify and protect species rich habitats and habitats of local importance 6. Policy is too generic and meaningless 7. The Welwyn Hatfield Green Corridor should be mentioned

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
21.1 Introduction	
21.1	<u>Objection</u> 1. Allocations in proximity of grade II listed Panshanger Park are contrary to the NPPF
21.2 Heritage Assets	
21.2	<u>Other Comments and Observations</u> 1. There are 16 Registered Parks and Gardens in the District not 15
21.2.5	<u>Support</u> 1. Paragraph is not likely to be effective or consistent with national policy - Non-designated heritage assets should be treated the same as designated assets 2. The Conservation area Appraisals and Historic Parks and Gardens SPD do not take account of the historic environment as a whole – assets outside these documents will not be treated appropriately
Policy HA1 Designated Heritage Assets	
HA1	<u>Objection</u> 1. Adds no additional value to the NPPF policy 2. Policy should be reworded to be in line with paragraph 131 of the NPPF 3. Policy does not cover possibility of “less than substantial harm”
Policy HA2 Non-Designated Heritage Assets	
HA2	<u>Support</u> 1. Policy is supported
	<u>Objection</u> 1. Adds no additional value to the NPPF policy

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	2. Unclear what the policy is trying to achieve
HA2 Part I	<u>Objection</u> 1. Part I not effective as the NPPF states necessary expertise is required
HA2 Part II	<u>Objection</u> 1. Unclear what the policy is trying to achieve
21.3 Archaeology	
21.3.3	<u>Objection</u> 1. Plan should require appropriate analysis of material and publication of results 2. Policy needs to be in line with paragraph 141 of the NPPF – require recording and the advancement of understanding of significance to be lost
21.3.4	<u>Objection</u> 1. Paragraph is unclear – areas of Archaeological Significance can include areas of archaeological potential
Policy HA3 Archaeology	
HA3	<u>Objection</u> 1. Adds no additional value to the NPPF policy
Policy HA4 Conservation Areas	
HA4	<u>Objection</u> 1. Adds no additional value to the NPPF policy 2. Conservation Area Character Appraisals are non-statutory documents which are only a material consideration
HA8 Part I(f)	<u>Objection</u> 1. Criterion (f) is contrary to paragraph 11 of the NPPF – authentic restoration is not necessary when features are already lost

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
HA8 Part II	<u>Objection</u> 1. Policy is contrary to the NPPF – no ban on demolition where buildings make a contribution to the area
Policy HA7 Listed Buildings	
HA7	<u>Objection</u> 1. Adds no additional value to the NPPF policy
HA7 Part II	<u>Objection</u> 1. No provision within the NPPF for this criterion
HA7 Part III	<u>Objection</u> 1. No provision within the NPPF for this criterion
21.6 Historic Parks and Gardens	
21.6.1	<u>Objection</u> 1. No consultation with the Friends of Panshanger Park
21.6.5	<u>Objection</u> 1. Hertfordshire Garden Trust have not been requested to produce a local list
Policy HA8 Historic Parks and Gardens	
HA8	<u>Objection</u> 1. Adds no additional value to the NPPF policy 2. Historic Parks and Gardens are finite resources 3. Consultation required with the Hertfordshire Garden Trust

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Policy HA9 Enabling Development	
HA9	<u>Objection</u> <ol style="list-style-type: none"><li data-bbox="421 395 1205 435">1. Adds no additional value to the NPPF policy<li data-bbox="421 435 846 475">2. No need for this policy<li data-bbox="421 475 1832 563">3. If retained, should be amended to refer to Historic England's guidance on enabling development

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
22.1 Introduction	
22.1	<u>Objection</u> <ol style="list-style-type: none"> 1. There should be a policy requiring sustainable energy generation in new builds. 2. Need for greater encouragement of renewable energy schemes. 3. The policies do not encourage net-zero developments.
22.2 Adaptation	
CC1	<u>Support</u> <ol style="list-style-type: none"> 1. Support for policy wording. <u>Objection</u> <ol style="list-style-type: none"> 1. The policy adds nothing to the NPPF and therefore should be deleted. <u>Other Comments and Observations</u> <ol style="list-style-type: none"> 1. The policy could be more detailed.
22.3 Mitigation	
CC2	<u>Objection</u> <ol style="list-style-type: none"> 1. The policy adds nothing to the NPPF and therefore should be deleted. 2. Carbon reduction technologies are not always feasible. 3. Not all construction materials are capable of re-use. 4. Government has abandoned work on allowable solutions so reference should be deleted. 5. The requirement that applicants are 'encouraged' to achieve standards beyond Building Regulations should be deleted.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
22.4 Renewable and Low Carbon Energy	
CC3	<p data-bbox="416 355 577 391"><u>Objection</u></p> <p data-bbox="416 395 1805 430">1. Reference to the potential impact of schemes on aerodromes should be included.</p> <p data-bbox="416 483 1003 518"><u>Other Comments and Observations</u></p> <p data-bbox="416 523 1980 603">1. The policy could be strengthened to explain what measures/technologies the Council would support.</p>

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
23.2 Flood Risk	
WAT1	<u>Support</u> 1. Support for policy wording. <u>Objection</u> 1. The policy adds nothing to the NPPF and therefore should be deleted. 2. The policy may not ensure that there is no increased risk of flooding downstream of development sites.
23.3 Water Quality and the Water Environment	
23.3.2	<u>Other Comments and Observations</u> 1. It would be useful to re-insert the text from the Preferred Options Plan concerning the Water Framework Directive.
WAT2	<u>Support</u> 1. Support for policy wording. <u>Objection</u> 1. The policy adds nothing to the NPPF and therefore should be deleted.
WAT3	<u>Support</u> 1. Support from Environment Agency and Lee Valley Regional Park Authority for policy wording. <u>Objection</u> 1. The policy adds nothing to the NPPF and therefore should be deleted. 2. The policy should not say 'unless there is clear justification for doing so'.
23.4 Efficient Use of Water Resources	
23.4.4	<u>Objection</u> 1. Concern regarding water pressure in Ware and the impact of new development

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
WAT4	<u>Support</u> 1. Support for policy wording. <u>Objection</u> 1. The policy adds nothing to the NPPF and therefore should be deleted. 2. The water efficiency standard is not ambitious enough. 3. Reference to grey water recycling should be removed.
23.5 Sustainable Drainage	
23.5.5	<u>Other Comments and Observations</u> 1. Clarity required with regards to who is responsible for future maintenance of SuD's.
WAT5	<u>Support</u> 1. Support for policy wording. <u>Objection</u> 1. The policy adds nothing to the NPPF and therefore should be deleted. 2. Consideration should be given to the potential of SuD's to increase bird populations and therefore the potential for bird strikes near Stansted Airport.
23.6 Wastewater Infrastructure	
23.6	<u>Objection</u> 1. Concern regarding the capacity of Rye Meads Sewage Treatment Works and whether the Council is reliant on advice from Thames Water in this regard.
23.6.4	<u>Objection</u> 1. Suggested wording amendment regarding need for developers to engage with Thames Water.
23.6.5	<u>Objection</u> 1. Objection to the insinuation that fuel discharges from Stansted Airport could compromise water quality.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
WAT6	<p><u>Support</u></p> <ol style="list-style-type: none">1. Support for policy wording. <p><u>Objection</u></p> <ol style="list-style-type: none">1. The policy adds nothing to the NPPF and therefore should be deleted.2. The wording does not meet the requirements of Habitat Regulations Assessment.3. Adequate sewerage infrastructure should be in place prior to development.

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Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
24.2 Contaminated Land and Land Instability	
24.2	<u>Objection</u> 1. Allocation east of Welwyn Garden City does not take account of former landfill
Policy EQ1 Contaminated Land and Land Instability	
21.2	<u>Support</u> Policy is supported but could be strengthened with addition to competent persons <u>Objection</u> 1. Adds no additional value to the NPPF policy
Policy EQ2 Noise Pollution	
EQ2	<u>Support</u> 1. Support for requirement to produce a detailed noise assessment <u>Objection</u> 1. Adds no additional value to the NPPF policy 2. Noise pollution from road traffic is not just attributable to growth at Stansted Airport - amendment requested to clarify this
EQ2 Part III	<u>Support</u> 1. Support for the criterion in principle <u>Other Comments and Observations</u> 1. An amendment may be required to ensure that noise sensitive development will not prejudice existing operations

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Policy EQ3 Light Pollution	
EQ3	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Policy is supported 2. Recognition that ecology is an important consideration of limiting light pollution is supported <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Adds no additional value to the NPPF policy 2. Unclear what the policy is trying to achieve <p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. Reference to other benefits of reducing light pollution could be added to the supporting text
Policy EQ4 Air Quality	
EQ4	<p><u>Support</u></p> <ol style="list-style-type: none"> 1. Inclusion of Air Quality Guidance is supported – provides a clear approach, though more cross-referencing to the Air Quality Guidance may be useful <p><u>Objection</u></p> <ol style="list-style-type: none"> 1. Policy should enable permission to be refused if a development worsens air quality 2. Policy will not be effective due to quantum of development, regardless of mitigation

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
25.2 Infrastructure and Service Delivery	
25.2	<u>Objection</u> <ol style="list-style-type: none"> 1. Insufficient reference to infrastructure provision throughout the Plan. 2. More information is required in relation to Rye Meads STW. 3. The Infrastructure Delivery Plan requires more detail including costings, funding sources and consideration of cumulative impacts. 4. The Infrastructure Delivery Plan should refer to potential upgrades to the A10. 5. The Infrastructure Delivery Plan should refer to Crossrail 2. 6. The Infrastructure Delivery Plan should provide greater flexibility
DEL1	<u>Other Comments and Observations</u> <ol style="list-style-type: none"> 1. The weight of financial contribution should not compromise the delivery of housing. 2. Ongoing transport modelling in relation to the A414 in Hertford and a Northern Harlow Bypass may lead to a need to review the District Plan. 3. Importance of establishing infrastructure partnerships and governance arrangements.
25.3 Developer Contributions	
25.3.3	<u>Other Comments and Observations</u> <ol style="list-style-type: none"> 1. The Council should consider adopting Community Infrastructure Levy. Restrictions on pooling of contributions may limit ability to fund infrastructure.
DEL2	<u>Objection</u> <ol style="list-style-type: none"> 1. The policy adds nothing to the NPPF and therefore should be deleted. 2. Waste facilities should be included within the list of infrastructure in Part II of the policy.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
25.4 Mitigation	
25.4	<u>Objection</u> <ol style="list-style-type: none"><li data-bbox="427 395 1973 475">1. There is no mechanism for the Council to intervene when aspects of the Plan are not being delivered.<li data-bbox="427 483 1469 523">2. Monitoring should seek to measure positives as well as loss.<li data-bbox="427 531 1883 563">3. Measuring the number and area of wildlife sites is unlikely to reveal anything of value.

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
Sustainability Appraisal	
	<p><u>Objection</u></p> <ol style="list-style-type: none"> 1. The Sustainability Appraisal only assesses eight general distribution options and doesn't provide a detailed sustainability assessment of each proposed site. 2. There is no justification for discounting land north of the Green Belt. 3. As the SA does not contain a detailed consideration of the historic environment and is not commensurate with a positive strategy for the historic environment 4. The identified negative impacts of the Plan on landscape character will result in negative impacts on the historic environment 5. The avoidance of impacting historic town centres should not be at the expense of historic villages – the significance of rural areas has been afforded less weight 6. The SA does not give sufficient consideration to the natural environment – not based on evidence of ecology – fails to show how impacts can be negatively mitigated 7. A cross-border SA should be undertaken 8. The SA produces arbitrary scores which have no meaning or evidence 9. The SA should list all technical studies used in its consideration 10. The SA does not consider all reasonable alternatives such as meeting the higher Objectively Assessed Housing Need 11. The alternatives considered at earlier stages are not discussed or assessed or why the preferred options were chosen 12. There is no reference to the inter-relationships between effects 13. The methodology does not enable the reader to understand the assessment 14. The SA does not explain how it has been taken into account in decision making

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	<p><u>Site Specific Comments</u></p> <ol style="list-style-type: none"> 1. No alternatives that do not include the Gresley Park option were tested, other settlements can accommodate homes instead of this site 2. The SA supports the inclusion of sites that have been discounted such as land to the west of Buntingford, Dicker Mill in Hertford and land to the south-west of Sawbridgeworth <p><u>Support</u></p> <ol style="list-style-type: none"> 1. Support for the positive endorsement of land to the south of Bishop's Stortford within the SA
Part 1 Assessment	
	<p><u>Other Comments and Observations</u></p> <ol style="list-style-type: none"> 1. The SA would benefit from better signposting of Schedule 2 of the Regulations 2. The SA would benefit from the inclusion of a table/graphic illustrating the SA and Local Plan processes and the main alternatives considered at each stage 3. The relationship of the Local Plan with other relevant plans or programmes (East Herts or otherwise) is not clear from the SA 4. There should be a section on mitigation to illustrate how mitigation has been considered where there are identified potential negative impacts 5. The SA should also consider the possible impacts of any proposed mitigation/infrastructure required to facilitate development 6. The cumulative impacts of development should be given greater prominence in the SA 7. A comprehensive description of the current baseline and an assessment of this baseline with and without the Plan is required 8. The Baseline should be updated in the light of recent assessments – 2016 Strategic Flood Risk Assessment and Habitat Regulations Assessment cited 9. The relationship between the SA and site appraisals should be clearer – should show how the

Sustainability Appraisal

Section/ Paragraph /Policy	Summary of Responses (Support/Objection/Other Comments and Observations)
	SA has informed the selection or rejection of alternatives
15.3.1	<u>Support</u> 1. Endorsement of the phrase ‘historic environment’ rather than ‘heritage asset’
Appendix II	
	<u>Objection</u> 1. The baseline focuses on impacts on heritage assets rather than the historic environment more broadly in line with the NPPF definition
Appendix III	
	<u>Objection</u> 2. There should be a traffic light assessment of the historic environment impacts – an assessment based on distance is not sufficient
Appendix V	
	<u>Objection</u> 1. Historic environment experts have not been involved in the site selection process 2. Concern about the number of red and amber flags for the historic environment in Table C
Page 105	<u>Site Specific Objections</u> 1. Discounting land to the south-west of Sawbridgeworth ignores the proposed retention/enhancement of the Local Wildlife Site

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 9 MARCH 2017

REPORT BY THE LEADER OF THE COUNCIL

DUTY TO CO-OPERATE COMPLIANCE STATEMENT, MARCH 2017

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents the Duty to Co-operate Compliance Statement, March 2017.

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the Duty to Co-operate Compliance Statement be agreed in support of the Pre-Submission District Plan; and
(B)	the Head of Planning and Building Control, in consultation with the Leader of the Council, be authorised to agree any further amendments to the Duty to Co-operate Compliance Statement as required.

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.

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 An Interim version of the Duty to Co-operate Statement was presented to Panel in October 2016, prior to the commencement of the consultation on the Pre-Submission District Plan. This report now presents an updated version of that document.
- 2.4 Importantly, the updated Compliance Statement, which forms **Essential Reference Paper B** to this report, includes a series Memoranda of Understanding (MoU's). The purpose of the MoU's is to demonstrate how co-operation has taken place and identify the matters that have been agreed. In addition, the outstanding issues for which there is currently no agreement are also identified.
- 2.5 The majority of the MoU's are in draft form, and as such, have not yet been agreed with the relevant parties. The content of these MoU's will be finalised following further discussions with those parties prior to submission of the Plan at the end of March. Delegated authority for the Head of Planning and Building Control, in consultation with the Members of the Panel, to prepare, agree and sign MoU's was agreed at a meeting of the Panel on 25th February 2016.
- 2.6 Delegated authority is now also sought for the Head of Planning and Building Control, in consultation with the Leader of the Council, to agree any further amendments to the Duty to Co-operate Compliance Statement as required, prior to the District Plan Examination.
- 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>

District Planning Executive Panel 25th February 2016:

<http://democracy.eastherts.gov.uk/documents/s32484/Duty%20to%20Co-Operate%20Update.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:	No
Legal:	There are no direct legal implications arising from this report.
Financial:	There are no direct financial implications arising from this report for the Council. The cost of preparing a District Plan is significant and has been budgeted over the duration of its preparation.
Human Resource:	Staff resource is in place to ensure the ongoing timely preparation of the District Plan.
Risk Management:	Without a Duty to Co-operate Compliance Statement, the District Plan is likely to be found 'unsound' at Examination.
Health and wellbeing – issues and impacts:	The 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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**Duty to Co-operate
Compliance
Statement**

March 2017

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 Duty to Co-operate Compliance Statement seeks to support the 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 The Council will continue to pro-actively co-operate with relevant bodies over the coming months prior to the District Plan Examination, and subsequently through the implementation phase.

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. 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

Memoranda of Understanding (MoUs)

2.2 In order to support this Compliance Statement, a series of Memoranda of Understanding have been drafted with neighbouring authorities and other key organisations. These identify the matters where agreement has been reached, but also any outstanding matters where there is no agreement at present. The majority of the MoUs are currently in draft form and their content will be finalised following further discussions with the relevant parties prior to submission of the Plan at the end of March. The MoUs, which can be found within the appendices, are listed below:

- Co-operation for Sustainable Development Board – Highways and Transportation Infrastructure (**Appendix A**)
- Co-operation for Sustainable Development Board – Managing the impacts of growth within the West Essex/East Herts Housing Market Area on Epping Forest Special Area of Conservation (**Appendix B**)
- Co-operation for Sustainable Development Board – Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area (**Appendix C**)
- Hertfordshire Infrastructure Planning Partnership (**Appendix D**)
- Broxbourne Borough Council (**Appendix E**)
- North Herts District Council (**Appendix F**)

- Stevenage Borough Council (**Appendix G**)
- Welwyn Hatfield Borough Council (**Appendix H**)
- Hertfordshire County Council – Education (**Appendix I**)
- Hertfordshire Country Council - Highways (**Appendix J**)
- Environment Agency (**Appendix K**)
- Historic England (**Appendix L**)
- Natural England (**Appendix M**)
- Local Nature Partnership (**Appendix N**)
- Lee Valley Regional Park Authority (**Appendix O**)
- Thames Water (**Appendix P**)

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

2.3 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;

2.4 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).

- 2.5 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 Q**.
- 2.6 The strategic cross boundary issues that have been addressed through the Co-op Board are identified below. It should also be noted that Harlow, Epping Forest and Uttlesford Councils, in addition to Essex County Council, all responded to the Pre-Submission Consultation on the District Plan by confirming that, in their view, the Plan is 'sound'.

Housing and Economic Need

- 2.7 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.
- 2.8 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.
- 2.9 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) has been prepared which commits all four Councils to meeting their individual housing needs

within their own administrative boundaries, including those associated with Gypsies and Travellers and Travelling Showpeople.

- 2.10 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. Further work on the FEMA is currently being undertaken in order to gain an up to date understanding of employment needs across the wider area, and how those needs should be disaggregated amongst the respective local authorities. This also includes giving consideration to the most suitable locations for different employment uses. The outputs of this work will then be agreed through an MoU, signed by the four Housing Market Area authorities.
- 2.11 The Government released new household projections in July 2016. Further interim 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 following adoption of the District Plan. Any future work on housing need will also need to consider how national planning policy might have changed in light of the proposals contained within the Government's Housing White Paper which was published in February 2017.
- 2.12 Both the SHMA and supporting Economic Evidence are available to view online here: <http://www.eastherts.gov.uk/shma>

Transport

- 2.13 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).
- 2.14 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 Transport Memorandum of Understanding has been signed 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. It should be noted that some of the ‘future actions’ identified within the MoU have now been completed, particularly those that relate to M11 Junction 7a. The MoU will therefore need to be updated periodically to reflect further work undertaken.
- 2.15 Additional transport modelling will be required as work on respective local plans progresses.

Harlow Strategic Sites Assessment

- 2.16 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.
- 2.17 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.

- 2.18 The Harlow Strategic Sites Assessment is available to view online here: <http://www.eastherts.gov.uk/harlowsites>

Harlow and Gilston Garden Town

- 2.19 In March 2016, the Government published a prospectus entitled 'Locally Led Garden Villages, Town and Cities'. It invited 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.
- 2.20 In response to the prospectus, East Herts, Harlow and Epping Forest Councils, with support from the Advisory Team for Large Applications (ATLAS), submitted a joint expression of interest in relation to growth in and around Harlow. The Government announced in January 2017 that the Garden Town bid had been successful and awarded the joint working authorities £500,000 to carry out further technical work. This will be a key area of continued joint working over a number of years for the respective authorities. The expression of interest is located within **Appendix R** to this report.

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

- 2.21 As part of the consideration of reasonable alternatives, consultants were 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. The study provides a strategic level basis for the more localised options being explored through the Sustainability Appraisals of each authority's local plans. The study can be viewed here: <http://www.eastherts.gov.uk/technicalstudies>

Air Quality

2.22 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 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 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

2.23 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.

2.24 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, commissioned consultants to assess the suitability of sites on the periphery of Harlow. The study identifies that sites to the north and east of Harlow may be suitable in terms of accommodating a re-located hospital. The hospital is currently preparing a Strategic Outline Case in order to apply for the necessary funding from Government. Joint working on this issue will continue over the coming months, particularly in light of the successful Garden Town bid.

London Stansted Cambridge Consortium (LSCC)

2.25 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

- 2.26 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.
- 2.27 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.
- 2.28 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.
- 2.29 The outcomes of the initial COMET model run have informed the content of the representations made by Hertfordshire County Council on the Pre-Submission version of the District Plan in respect of potential impact for East Herts. In this respect, the County Council is generally satisfied with the approach taken by East Herts in relation to the proposed locations for growth, and in

transport terms considers the Plan to be ‘sound’ and, therefore, fit for purpose.

- 2.30 In addition to informing local plan making in Hertfordshire, the results of the COMET modelling will also inform the County Council’s 2050 Transport Vision and the subsequent Local Transport Plan 4 (LTP4). The final version of LTP4 will include strategic schemes which would be anticipated to be delivered within the lifespan of that Plan (e.g. a strategic solution to the A414 congestion issue in Hertford). Public consultation on a draft LTP4 is expected later this year.

Hertfordshire Infrastructure and Planning Partnership

- 2.31 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 S** to this study.

Broxbourne Borough Council

- 2.32 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.
- 2.33 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.

2.34 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.

2.35 In its response to the Pre-Submission District Plan, Broxbourne noted that further transport work will be required in order to understand the impact of the full Gilston Area allocation of 10,000 homes on the highway network, with particular consideration given to the potential for additional traffic movements southbound on the A10.

Welwyn Hatfield Borough Council

2.36 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 strategy diagram have been developed for inclusion within the respective Local Plans. An MoU has been prepared which identifies the basis for continued joint working, including masterplanning, in order to deliver development in this location. The MoU also identifies 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.

2.37 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.

- 2.38 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

- 2.39 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.
- 2.40 Stevenage Council submitted its Local Plan to the Planning Inspectorate in Spring 2016 and the Examination is currently ongoing. The Plan seeks to meet the full housing needs arising from Stevenage Borough.

North Herts District Council

- 2.41 North Herts District Council has progressed a Local Plan in order to meet its full housing needs. As part of its emerging local plan, North Herts is proposing significant development on the edge of Stevenage, within North Herts District. HCC has advised that this development, in conjunction with planned development in Stevenage itself and, to a lesser extent, 600 homes on the eastern side of the town within East Herts, result in a requirement for a new secondary school. HCC's preferred location for this school is a site to the north of the town, within North Herts. East Herts will

continue to work with the other local authorities in order to resolve this issue.

Uttlesford District Council

- 2.42 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.
- 2.43 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.
- 2.44 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. It is likely that these issues will be subject to a specific MoU between East Herts and Uttlesford Councils following further discussions.

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 the District Plan Examination 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 Pre-Submission draft of the District Plan which are generally positive in nature. The only objection was to the lack of reference to the Mill Site (BISH10) in the Flooding Sequential Test document – this objection has now been resolved.

Historic England

- 3.3 Historic England (previously English Heritage) submitted a number of comments to the Pre-Submission draft of the District Plan. HE has a number of concerns with regards to the potential impacts of certain developments on the historic environment. As the draft MoU demonstrates, most of these concerns are outstanding matters where there is currently no agreement. However, the MoU does identify a commitment from both parties to ongoing discussions.

Natural England

- 3.4 Natural England is broadly supportive of the proposals contained in the District Plan, although there are some outstanding matters which are identified by the draft MoU.
- 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 Examination of the District Plan. 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 previously, the Co-op Board has engaged with Princess Alexandra Hospital in order to consider its potential relocation 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 2.19, 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. Following further discussions, it is intended that an MoU be signed by the two parties.
- 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.

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

November 2016



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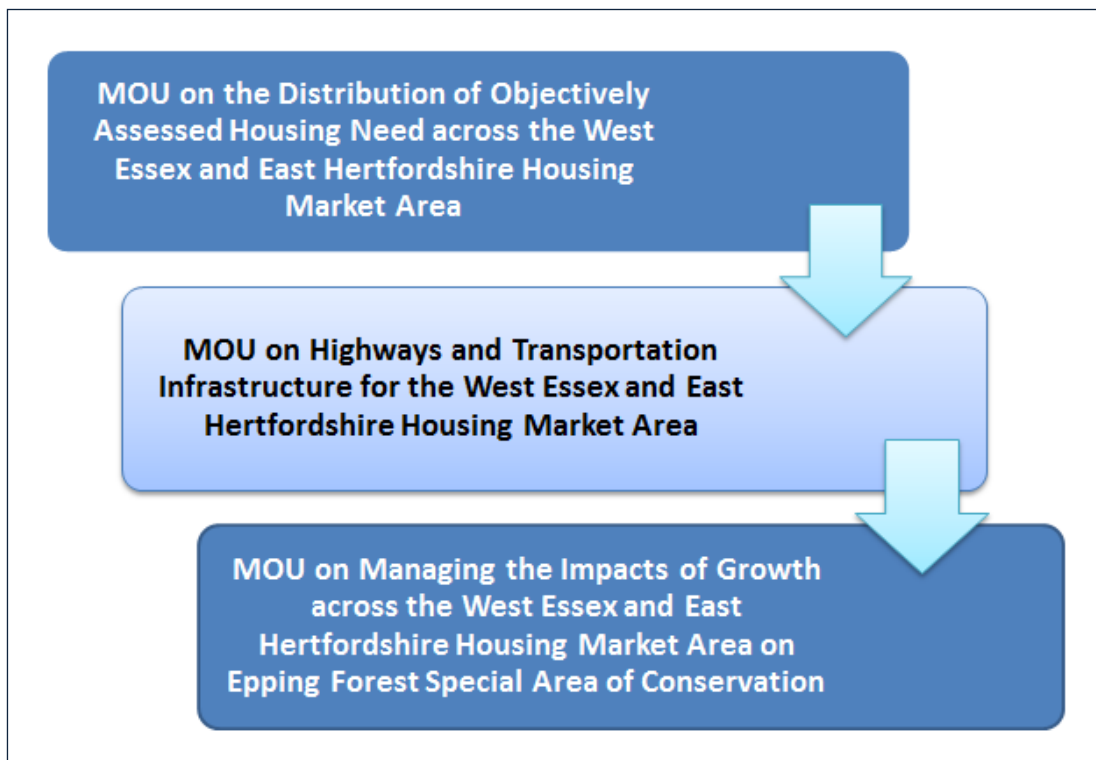
1 Background

- 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.

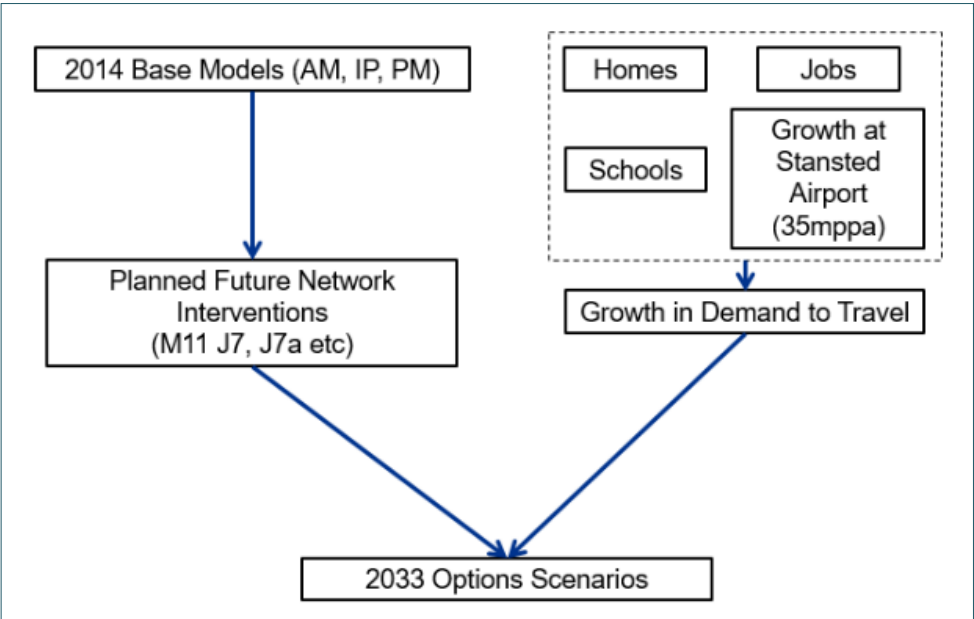
Figure 1 – Inter-related Memoranda of Understanding



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.

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 feedback to Highways England's Route Strategies, which will be the foundation of Highways England's first 'Strategic Road Network Initial Report' to be submitted to Government in 2017 and will inform the need 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 subject to funding and programme	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 Whilst the above schemes and projects have emerged as the conceptual solutions to the growth, before they can be progressed they will all require further transport modelling, business cases to be developed and assessment against policies and strategies of the respective highway authorities.
- 4.12 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.
- 5.3 Further work will be required to firm up costings of the proposed mitigations to establish affordability. The intention is to put in place a single infrastructure delivery plan (IDP) covering all of the interventions, setting out when they are required and what developments will be expected to contribute towards the scheme. The individual IDP's supporting each of the Local Plans will need to reflect these arrangements.
- 5.4 Subject to para 4.11, collective agreement will need to be reached with respect to phasing of the interventions and pooling of contributions to fund delivery in the agreed order. Decisions to proceed with an identified mitigation should be taken by the Co-operation for Sustainable Development Member Board

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	Richard Fox RFox@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: _____

9 Appendices

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

* 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'.

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.

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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



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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

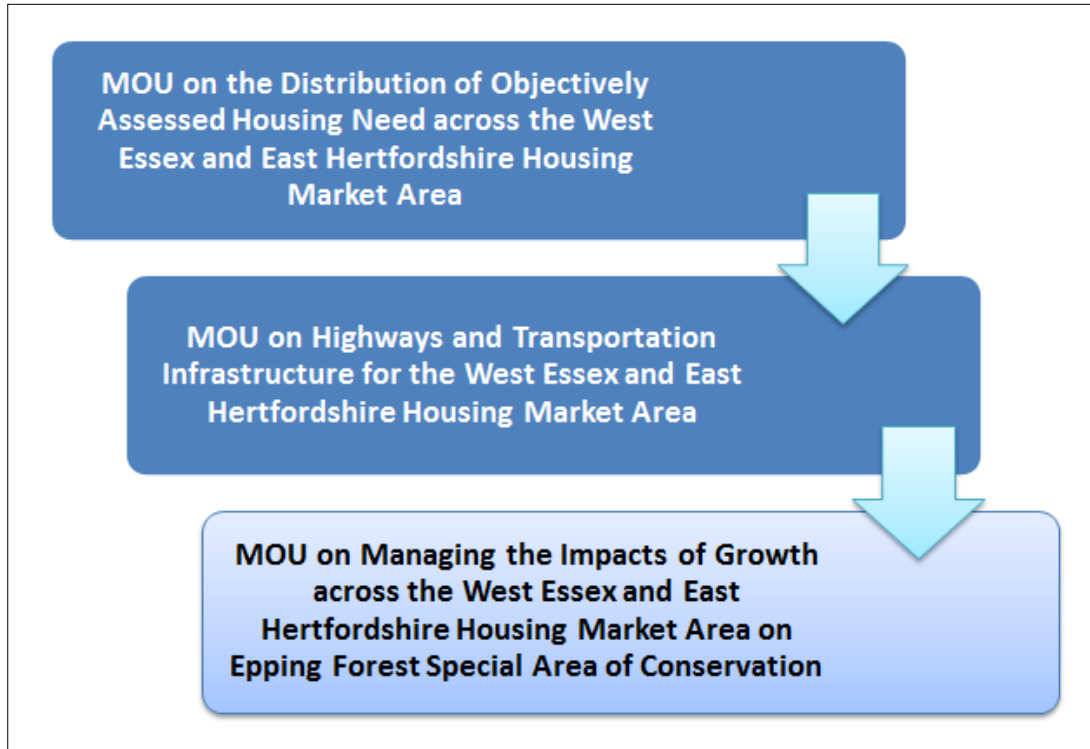
³ 2005 JNCC *Epping Forest Site Details*
<http://jncc.defra.gov.uk/ProtectedSites/SACselection/sac.asp?EUCode=UK0012720>

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.

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.

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: _____

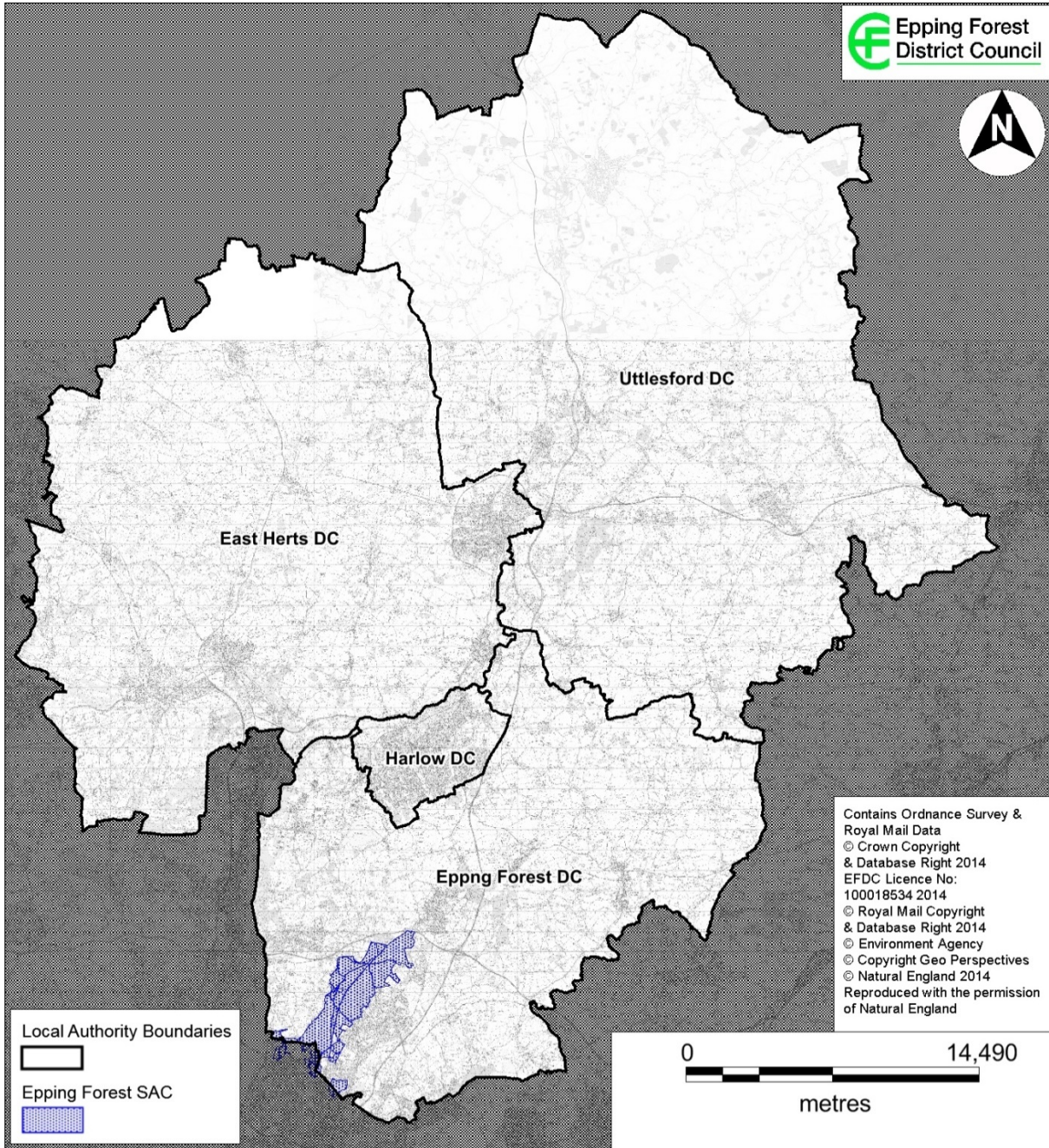
City of London Corporation

Name (printed): _____

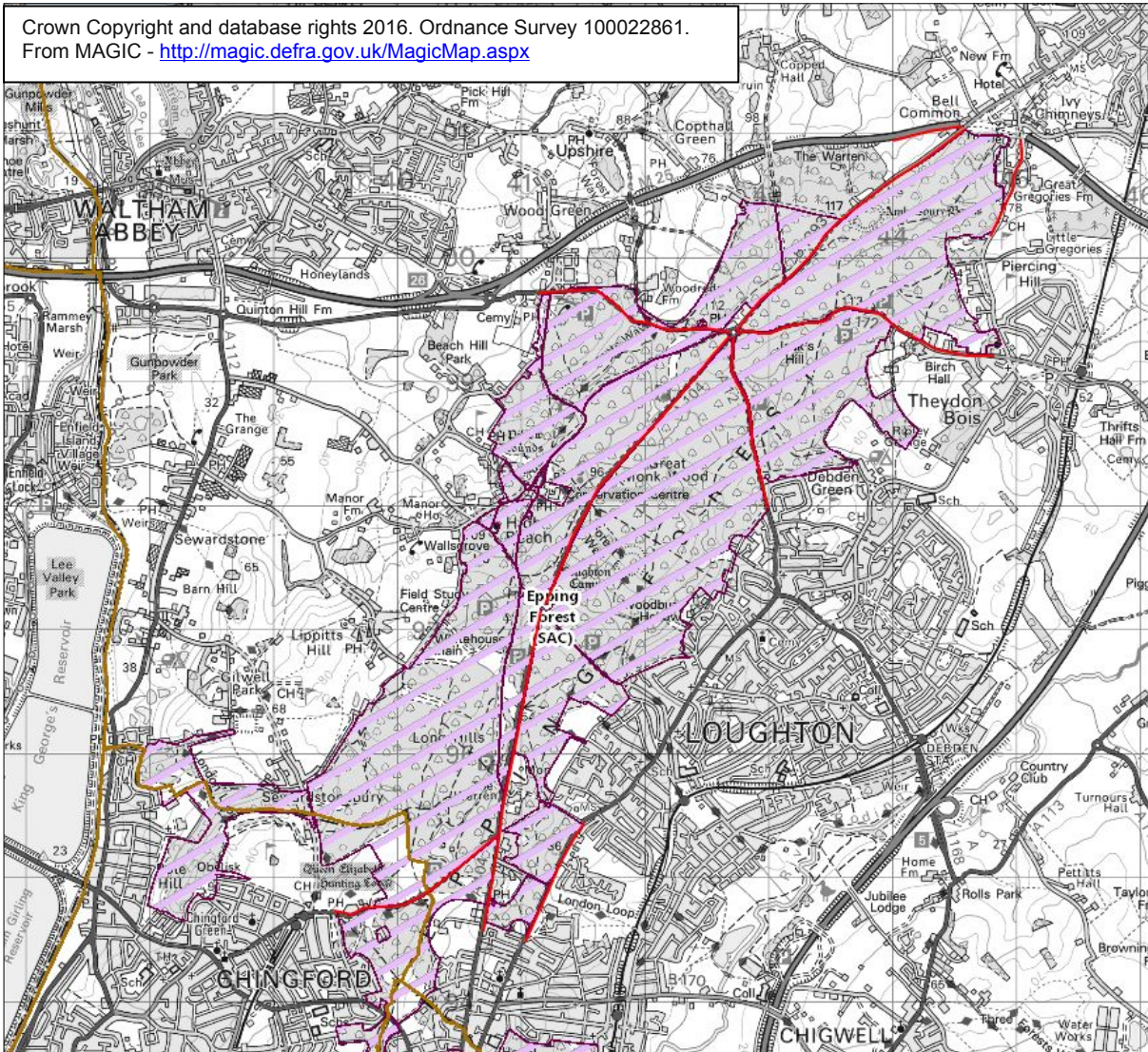
Signature: _____

Designation: _____

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

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**Memorandum of Understanding on
Distribution of Objectively Assessed Housing
Need across the West Essex/East Hertfordshire
Housing Market Area**

September 2016

Between

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



Uttlesford
District Council

And supported by (non-signatories)

Essex County Council (as a Highways Authority)
Hertfordshire County Council (as a Highways Authority)
Highways England



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1 Background

Introduction

- 1.1. This Memorandum of Understanding (MoU) concerns the distribution of the Objectively Assessed Housing Need (OAHN) of four councils comprising the West Essex/East Hertfordshire Housing Market Area (HMA): East Hertfordshire District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council (see Appendix 1 for more background on the HMA).
- 1.2. The MoU was prepared by officers and Members of these four authorities, with assistance from Essex County Council, Hertfordshire County Council and Highways England. The preparation of the MoU was overseen by the 'Co-operation for Sustainable Development Member Board' (the Co-op Member Board)¹.

Joint and co-ordinated working in the West Essex/East Hertfordshire HMA

- 1.3. The National Planning Policy Framework (NPPF) states that: "Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities..." and, furthermore, "The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities" (para 178). It also expects local authorities "...to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for Independent Examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development" (para 181).
- 1.4. East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils (also referred to in this MoU as the "West Essex/East Hertfordshire Authorities") have a substantial history of co-ordinated working on strategic planning issues, not least on assessing housing need and planning for future growth. Essex County Council and Hertfordshire County Council have also been involved in cross-boundary working with the authorities for many years on many different topics including planning matters.
- 1.5. Each of the West Essex/East Hertfordshire Authorities will publish their Local Plans for representations by the end of 2016 (East Hertfordshire, Harlow and Uttlesford District Councils for Regulation 19 representations and Epping Forest District Council for Regulation 18 consultation). The Local Plans will then progress into Independent Examination and adoption in 2017. Joint and co-ordinated working will continue on relevant matters.

Housing need

¹ The 'Co-operation for Sustainable Development Member Board', established October 2014, hereafter referred to as the 'Co-op. Member Board'. See Appendix 2 for further details of this and the related 'Co-operation for Sustainable Development Officer Group' (hereafter referred to as the 'Co-op Officer Group').

- 1.6. Three Strategic Housing Market Assessments (SHMAs), published in 2010, 2012 and 2015 have been undertaken for the combined area of East Hertfordshire, Epping Forest, Harlow and Uttlesford Districts². The most recent SHMA was commissioned by the Co-op Member Board and managed through a sub group of the Co-op Officer Group. Details of the terms of reference and working practices of the Co-op Member Board and the Co-op Officer Group are set out in Appendix 2. The 2015 SHMA gives an up to date and Planning Practice Guidance compliant³ assessment of housing need over the Housing Market Area (HMA) for the period 2011-2033. The 2015 SHMA gave the following headline results (in net additional dwellings) for the HMA as a whole, and for each local authority.

Figure 1 – Headline results from the SHMA (2015)

Local Authority	OAHN Market dwellings	OAHN Affordable dwellings	Total OAHN (net new dwellings 2011-2033)
East Hertfordshire DC	12,200	4,200	16,400
Epping Forest DC	8,100	3,200	11,300
Harlow DC	2,500	3,400	5,900
Uttlesford DC	9,700	2,800	12,500
Total for HMA	32,500	13,600	46,100

NB – totals may not sum due to rounding

The full 2015 Joint SHMA is available to view at:

<http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/458-strategic-housing-market-area>

Economic growth

- 1.7. The Co-op Member Board also commissioned a Joint Economic Report, to consider the Objectively Assessed Economic Need (OAEN) of the Functional Economic Market Area (FEMA, which has been found to be the same as the HMA). This was published in 2015 and gives an up to date and Planning Practice Guidance⁴-compliant assessment of employment need across the FEMA for the period 2011-2033. (More details of the 2015 Joint Economic Report can be found in Appendix 3).

Spatial distribution of housing

- 1.8. In order to comply with the Duty to Co-operate in section 33A of the Planning and Compulsory Purchase Act 2004, the West Essex/East Hertfordshire Authorities commissioned work from consultants AECOM, through the Co-op Member Board, to assess the sustainability of strategic spatial options for meeting the overall OAHN within the HMA. The results of this ‘spatial optioneering’ work inform this MoU.

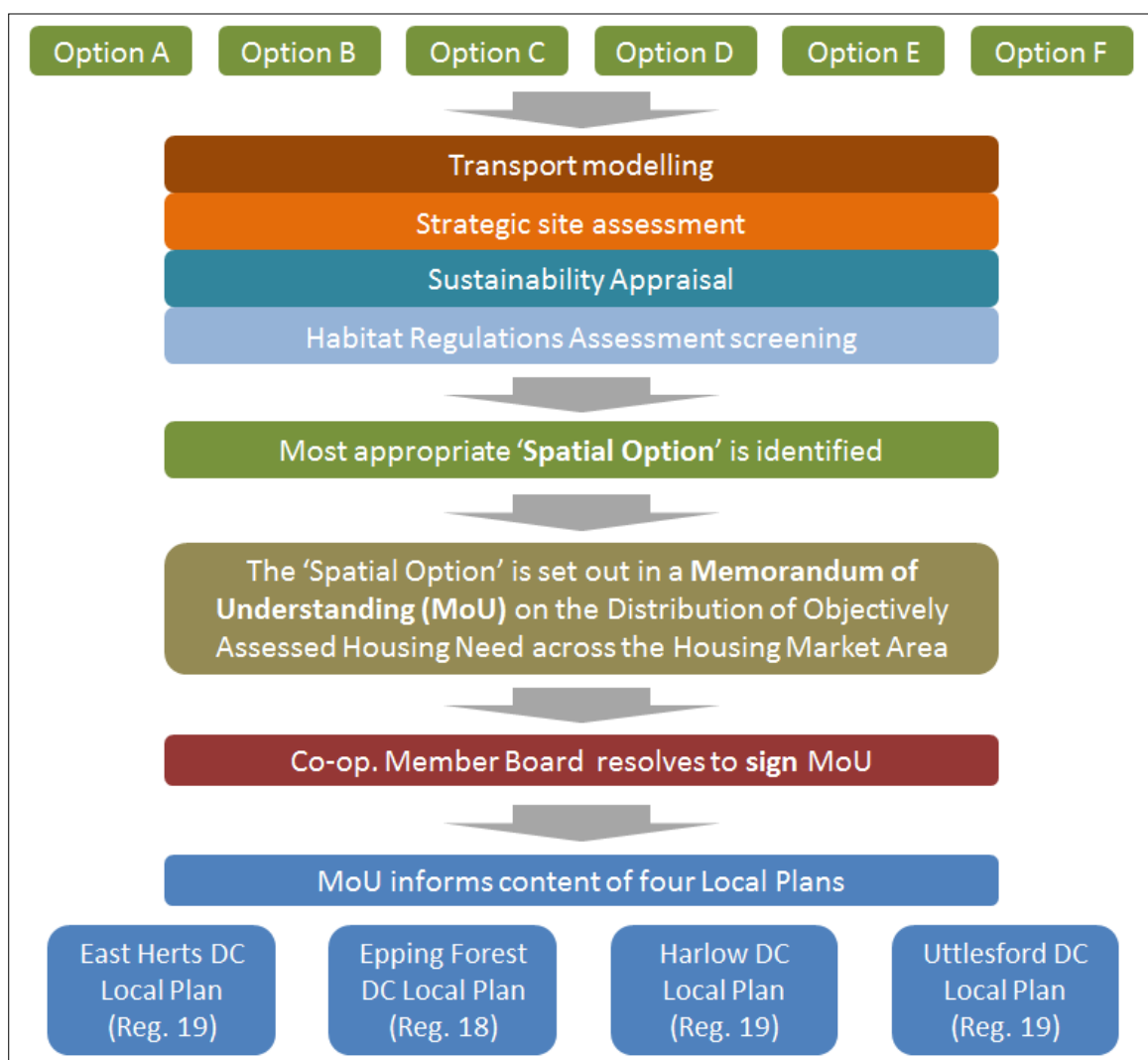
² The SHMAs published in 2010 and 2012 also included Broxbourne Borough Council and Brentwood Borough Council; both of these authorities declined to take part in the most recent SHMA, as Broxbourne BC decided to pursue its own SHMA and Brentwood BC had become part of a wider ‘Heart of Essex’ SHMA. However, both authorities adopted a ‘watching brief’ on the 2015 SHMA and through the Co-op Officer Group and Co-op Member Board, were involved in discussions about the SHMA brief and findings.

³ Planning Practice Guidance, Paragraph: 001 Reference ID: 2a-001-20140306

⁴ Planning Practice Guidance, Paragraph: 030 Reference ID: 2a-030-20140306

- 1.9. 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 (to be met in part through named strategic sites). Beyond these agreed figures the four authorities will determine the spatial distribution of housing in their respective areas through their own local plan processes.
- 1.10. The Spatial Options Study used four means to test six potential distribution Options (Options A - F), and the Co-op Member Board subsequently resolved on a specific 'Spatial Option', as set out in Figure 2.

Figure 2 – Process for the Strategic OAHN Spatial Options Study



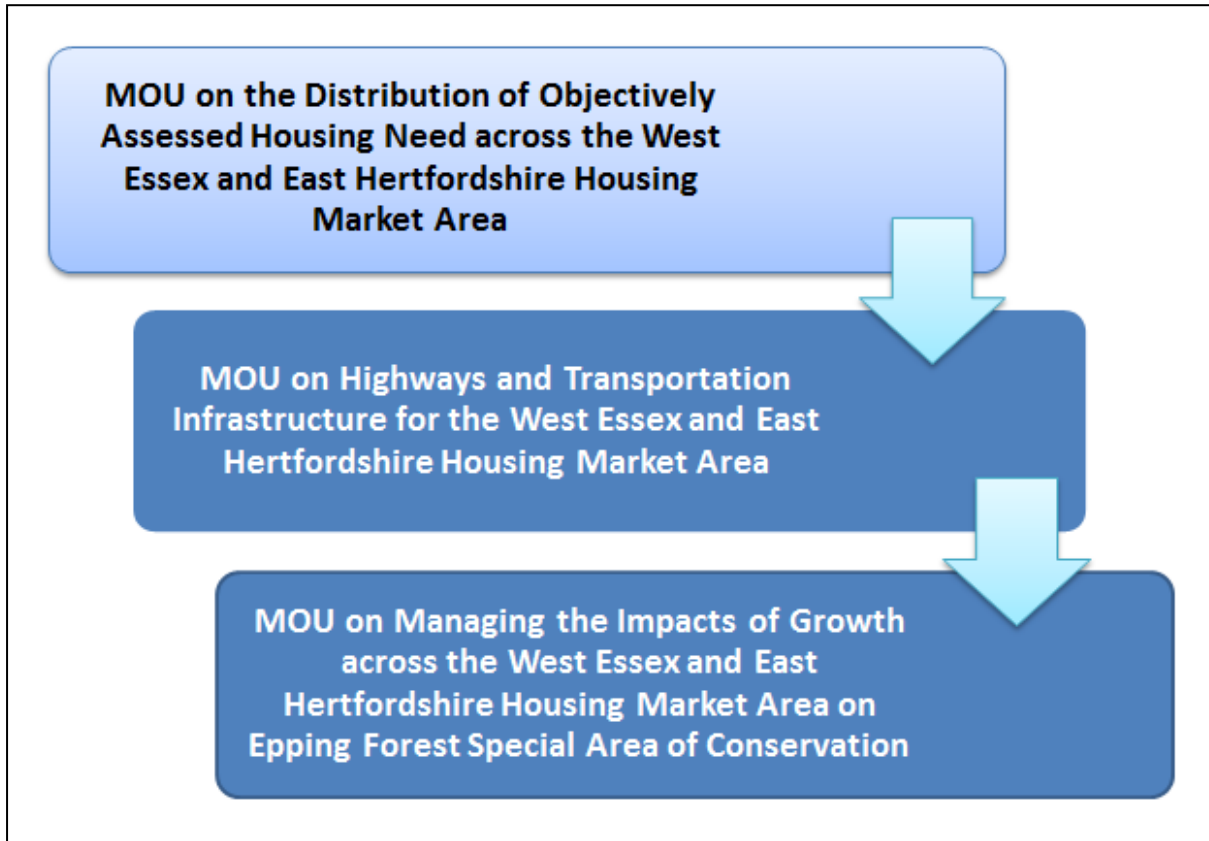
- 1.11. Further details of the Spatial Options Study are included within Appendix 4.

2 Purpose of this Memorandum of Understanding (MoU)

The three inter-related Memoranda of Understanding

- 2.1. This MoU is the overarching one of a group of three related memoranda of understanding.
- 2.2. The other two deal with highways and transportation infrastructure, and Epping Forest Special Area of Conservation respectively, as shown in Figure 3.

Figure 3 – Inter-related Memoranda of Understanding



This Memorandum of Understanding

- 2.3. This MoU is designed to address the distribution of OAHN as defined by the 2015 SHMA. Although it addresses the OAHN within the West Essex/East Hertfordshire HMA only, the draft of the MoU, and the evidence underpinning it, were discussed both at the Co-op Member Board and the Co-op Officer Group which includes other relevant authorities (see Appendix 2 for membership details).
- 2.4. The purpose of this MoU is to ensure that the West Essex/East Hertfordshire Authorities (supported by Essex County Council, Hertfordshire County Council and Highways England), working together, fulfil the following requirements:
 - (i) to meet in full, the Objectively Assessed Housing Need of the West Essex/East Hertfordshire HMA, as assessed by the Joint SHMA (2015), within the HMA (taking account of availability, viability and deliverability);
 - (ii) to deliver the shared Strategic Vision for the LSCC 'Core Area', as set out in Appendix 5 and to include this Strategic Vision as part of the individual local plans;

- (iii) to fulfil the commitment in the Joint Statement⁵ made by the Co-op Member Board in 2015, to "...work towards the production of a memorandum of understanding to support the joint working and meeting the duty to co-operate";
- (iv) to achieve item (i) above through the most sustainable pattern of development which is feasible, achievable and deliverable as assessed by the Spatial Options Study and other relevant evidence, by including the 'Spatial Option' for OAHN within individual Local Plans;
- (v) to continue to engage with one another 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;
- (vi) to continue to co-operate during the implementation and monitoring of individual Local Plans;
- (vii) to commission any future joint evidence work which may be required;
- (viii) to help demonstrate compliance with the Duty to Co-operate during the Independent Examination of Authorities' Local Plans;
- (ix) to assist in securing necessary enabling strategic infrastructure for the growth set out in this MoU; and
- (x) to inform and support the 'Highways and Transportation Infrastructure for the West Essex and East Hertfordshire Housing Market Area' MoU and 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 3).

Other matters considered outside this MoU

- 2.5. The NPPF states that, '*Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans*' (para 179).
- 2.6. There are of course many key issues, other than the spatial distribution of OAHN, which are cross-boundary in nature and which the West Essex/East Hertfordshire Authorities are working on together. Other key matters of strategic cross boundary significance which are being addressed by ongoing joint and co-ordinated work are listed in Figure 4. This is not an exhaustive list, and the four local authorities will continue to work together to identify and tackle cross-boundary matters. Essex County Council is preparing a Growth Infrastructure Framework, which will greatly assist in this task.

Figure 4 – Key matters of strategic cross-boundary significance (outside this MoU)

⁵ The Co-op Member Board issued a joint statement on sign-off of the 2015 Joint SHMA and 2015 Joint Economic Report, which is available here: <http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/532-shma-economic-growth-reports-co-op-board-joint-statement>.

Other Housing issues

- Viability
- Sustainable building materials and processes
- Unmet needs and five year housing land supply
- *Accommodation for Travellers and Travelling Showpeople (see below)*

Other Economic issues

- Existing retail offer and future need
- Competition between economic centres
- Commuting patterns

Highways & Transportation Infrastructure

- Delivery of the new J7A of the M11 to enable growth in and around Harlow
- Promotion of sustainable modes of transport
- Improvements at J7 and J8 of the M11
- London Stansted Airport growth
- Opportunities relating to Crossrail 2 and four-tracking of the West Anglia Main line
- Provision of Green Transport Corridors
- Central Line issues

Community Infrastructure

- Education - primary, secondary, higher
- Open spaces, and sport and recreation facilities
- Library provision

Health

- Consideration of a new site for Princess Alexandra Hospital, possibly a 'health and social care campus'
- Provision of primary care, adult social care etc.

Environment

- Epping Forest Special Area of Conservation (inc. air quality)
- Green Infrastructure
- Climate change including flood risk
- Food production, including the Lea Valley glasshouse industry
- Wastewater management
- Waste management
- Integration of local designations
- Urban form of growth areas and their integration with existing urban settlements

Built Environment

- Significant heritage assets e.g. Historic towns and Conservation areas
- Green Belt Reviews

- 2.7. These strategic cross-boundary issues will also be cascaded down to the individual Local Plans of the West Essex/Est Hertfordshire authorities.

Accommodation for Travellers and Travelling Showpeople

- 2.8. Assessing need and providing accommodation for Gypsies and Travellers and Travelling Showpeople is a key cross-boundary issue and one which will require ongoing and detailed engagement over the West Essex/East Hertfordshire area and beyond.
- 2.9. At the time of writing this MoU, an update to the Gypsy and Traveller Accommodation Assessment (GTAA) for Essex is being prepared. The update will re-assess need across Essex on the basis of the new definition (in planning terms) of travellers which was introduced in 2015⁶, and which effectively redefined 'traveller' in planning policy terms to

⁶ Planning policy for traveller sites, CLG, August 2015, available at <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

exclude those who no longer travel permanently. The update to the GTAA will also address need for Travelling Showpeople. The East Hertfordshire Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Update, May 2016⁷, has assessed need on the basis of the new national definition and taken into account the provisions of the Housing and Planning Act, 2016.

- 2.10. Harlow, Uttlesford and Epping Forest Districts have agreed to meet their own individual assessed need within their own boundaries. While East Hertfordshire District Council envisages being able to accommodate its need within its boundaries, it should be noted that it is entering into Duty to Co-operate arrangements with Welwyn Hatfield Borough Council to enable meeting some of both councils' identified needs via provision of a new site at Birchall Garden Suburb, East of Welwyn Garden City.
- 2.11. Those traveller households which have been identified as not meeting the new Planning Policy for Traveller Sites definition will have their accommodation needs provided for under other policies in the respective local plans.

⁷ This report is available at <http://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=151&MId=2862>

3 The ‘Spatial Option’ of OAHN within the HMA

- 3.1. The AECOM report (Harlow Strategic Site Assessment, September 2016) identified sufficient suitable sites in and around Harlow to accommodate close to 16,000 units provided that:
- Detailed traffic modelling demonstrates that development to the East of Harlow 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
 - Development can be distributed amongst several sites in combination
- 3.2. The Spatial Options Study identified the most suitable option capable of accommodating approximately 16,000 units in and around Harlow, based upon the evidence assessed by AECOM.
- 3.3. The most suitable ‘Spatial Option’ represents ‘planning positively for growth’, as it is higher than both the established OAHN within the published 2015 SHMA (46,100), and the number suggested by the 2012-based CLG household projections alone (49,638 dwellings).
- 3.4. It is lower than the SHMA consultants ORS’ estimated figure for emerging OAHN taking into account the 2014-based Sub-National Population Projections, and the 2012-based Household Projections (approximately 54,600⁸), and lower than Option F (57,141) but it still makes good progress towards these higher figures. The proposed option takes account of the infrastructure constraints and specifically the capacity on the highway network.

Figure 5 – 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
<i>...of which the area in and around Harlow* will provide</i>	<i>~ 16,100</i>

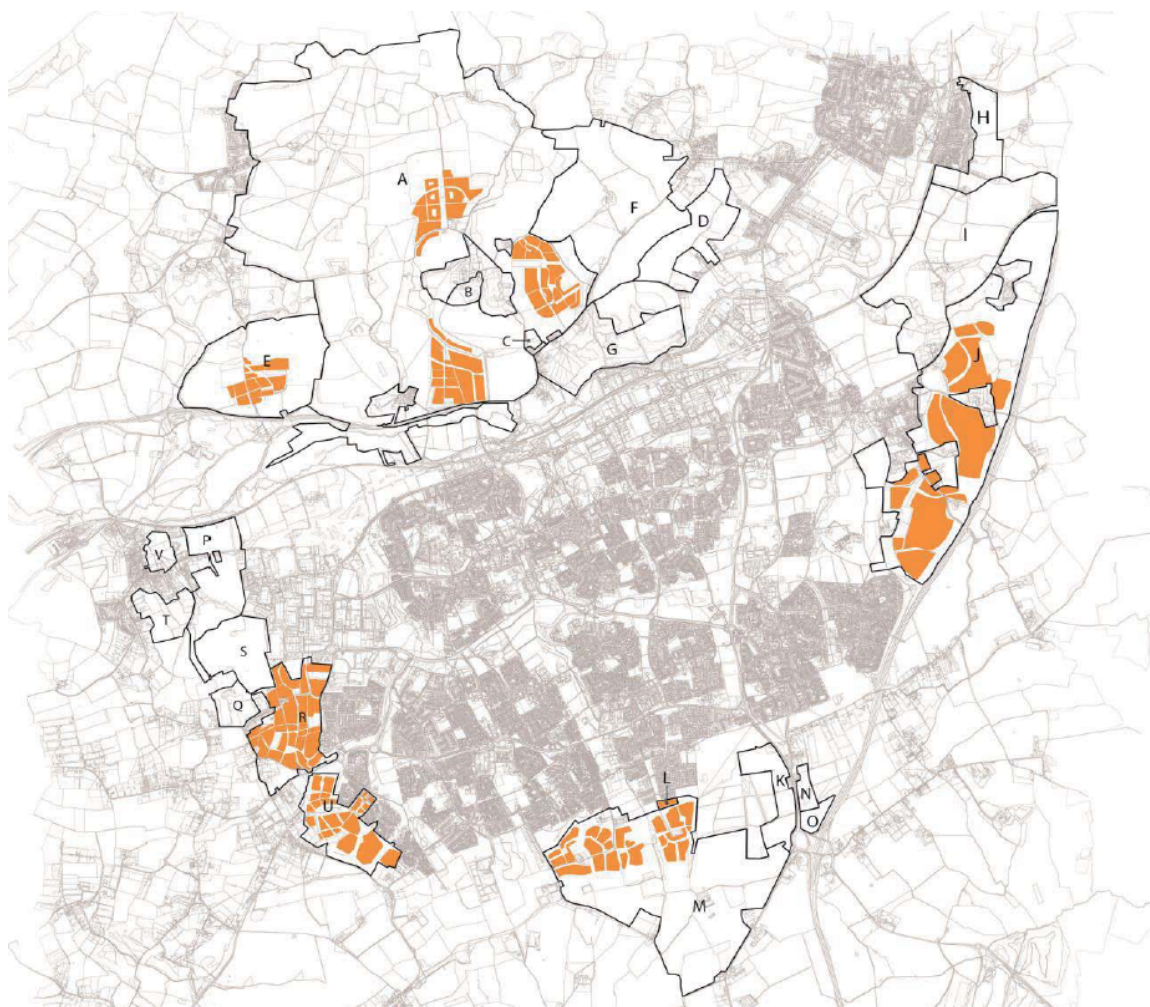
* This represents net new dwellings

** ‘In and around Harlow’ refers to Harlow town as well as around Harlow in adjoining districts

- 3.5. Approximately 16,100 dwellings identified in and around Harlow could be accommodated in the following AECOM distribution scenario subject to availability, viability and deliverability:

⁸ SHMA consultants ORS have estimated that the impact of the 2014-based Sub-National Population Projections, and 2012-based Household Projections could mean a rise in OAHN to approximately 54,600, but this number is not final. It has been tested through the Spatial Options Study in the interests of assessing what that number might mean for the HMA. Formal review of the OAHN number will take place through a full SHMA update in the future.

Figure 6; AECOM scenario for how growth could be distributed



- 3.6. Development in and around Harlow will also include, within Harlow District, existing commitments (including completions and permissions), urban brownfield developments and development of the existing site of Princess Alexandra Hospital (which will relocate), which are not shown in Figure 6. This comprises approximately 6,575 dwellings, which are within the overall number for Harlow District Council quoted in Figure 5.
- 3.7. Delivery of this 'Spatial Option' will be informed and managed through the four West Essex/East Hertfordshire Authorities' individual housing trajectories, which the authorities will continue to co-operate on.
- 3.8. For more details of the 'Spatial Option' please refer to Appendix 4, and the Spatial Options Study.

4 Future co-operation & monitoring

- 4.1. This section sets out basic tasks and outcomes at present; more specific actions will be jointly agreed at a later date as this MoU is reviewed and kept up to date.

Implementation and Monitoring of the tasks outlined in this MoU

- 4.2. Overall compliance with the MoU will be monitored via a standing item on the agenda of the Co-op Officer Board. If any issues arise they will be referred to the next available Co-op Member Board for discussion and resolution. There will also be a formal review of compliance with the MoU on the Co-op Member Board agenda roughly every six months.

Figure 7 – Implementing and monitoring the tasks outlined by the MoU

Task		Implementation by	Monitoring by
1	Deliver the shared Strategic Vision for the LSCC 'Core Area' and include as part of the individual local plans	West Essex/East Hertfordshire Authorities to include the shared Strategic Vision within their Local Plans and seek to deliver it together.	Co-op Officer Group and Co-op Member Board, supported by LSCC to monitor delivery of the shared Strategic Vision.
2	Meet in full, the OAHN (including affordable housing need) of the West Essex/East Hertfordshire HMA through the most sustainable pattern of development, as assessed by the Joint 2015 SHMA and Joint Economic Report (2015) and updates, (taking account of availability, viability and deliverability)	West Essex/East Hertfordshire Authorities to include the 'Spatial Option' for OAHN (high level numbers and spatial principles) within their individual evidence base and Local Plans and continue to co-operate to find the best way of meeting the OAHN requirement in full in the HMA (see also para. 1.8)	Co-op Officer Group to monitor Local Plan consultations and ensure that the 'Spatial Option' for OAHN is included in individual plans, and that ongoing engagement takes place
3	Continue to engage with one another at an early stage, in detail, and on a continuing basis, with the intention of avoiding avoid possible objections being made at consultation stages and/or at Independent Examination of the individual Local Plans	West Essex/East Hertfordshire Authorities to continue to engage regularly via the Co-op Officer Group and Co-op Member Board which provide a platform for regular communication for all parties.	Co-op Officer Group to monitor overall engagement from the West Essex/East Hertfordshire Authorities, ensuring that information is shared at an early stage for all Local Plan consultations.

Task		Implementation by	Monitoring by
4	Continue to co-operate during the implementation and monitoring of individual Local Plans	West Essex/East Hertfordshire Authorities to discuss and work towards a common set of indicators for monitoring Local Plan progress, and use these together.	Co-op Officer Group to monitor progress to common set of indicators.
5	Commission any future joint evidence work which may be required	West Essex/East Hertfordshire Authorities to continue to share ideas about joint evidence which could be commissioned. Essex and Hertfordshire County Councils to assist with any suggestions.	West Essex/East Hertfordshire Authorities to self-monitor their engagement with each other on this task.
6	East Hertfordshire DC, Epping Forest DC and Harlow DC to continue to work together on the expression of interest for capacity funding to DCLG in response to the Locally Led Garden Villages, Towns & Cities Prospectus.	The three authorities with support from Uttlesford District Council, Essex County Council and Herts County Council to submit a joint bid for capacity funding with the help of ATLAS	West Essex/East Hertfordshire Authorities to self-monitor their engagement with each other on this task
7	Help demonstrate compliance with the Duty to Co-operate to the Planning Inspectorate	West Essex/East Hertfordshire Authorities to continue to engage regularly via the Co-op Officer Group and Co-op Member Board, and to refer to this MoU, and the two related MoUs, at the Independent Examination into their Local Plans.	West Essex/East Hertfordshire Authorities to self-monitor their engagement with each other on this task.
8	Assist in securing enabling strategic infrastructure for the growth set out in this MoU	If this MoU is not effective in helping secure enabling infrastructure, it will be reviewed and re-drafted.	Co-op Officer Group to monitor effectiveness, if found ineffective, a new draft will be mooted at the next available Co-op Member Board, and decisions on drafting to take place at the Board thereafter.

Task		Implementation by	Monitoring by
9	Inform and support the 'Highways and Transportation Infrastructure for the West Essex and East Hertfordshire Housing Market Area MoU' and the 'Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation MoU'	<i>This task is already complete; the 'Highways and Transportation Infrastructure for the West Essex and East Hertfordshire Housing Market Area' MoU and the 'Managing the Impacts of Growth across the West Essex and East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation' MoU have been completed.</i>	

Contingency planning

- 4.3. Should the West Essex/East Hertfordshire Authorities encounter any significant difficulty in delivering the tasks outlined in this MoU, for example, if the 'Spatial Option' of OAHN were found in the future to be undeliverable for some unforeseen reason, the Authorities commit to working together to find a joint solution which represents the 'best option' for the HMA. This may include commissioning further technical evidence, preparing further MoUs or agreements etc. following discussions at the Co-op Officer Group and Co-op Member Board. Furthermore, mechanisms for Local Plan review may be considered by any of the Authorities.

5 Signatures

- 5.1 This Memorandum of Understanding is signed by and duly authorised for and on behalf of the following authorities. (See appendix 6 for details of roles and responsibilities of the organisations below in relation to this MoU):

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: _____

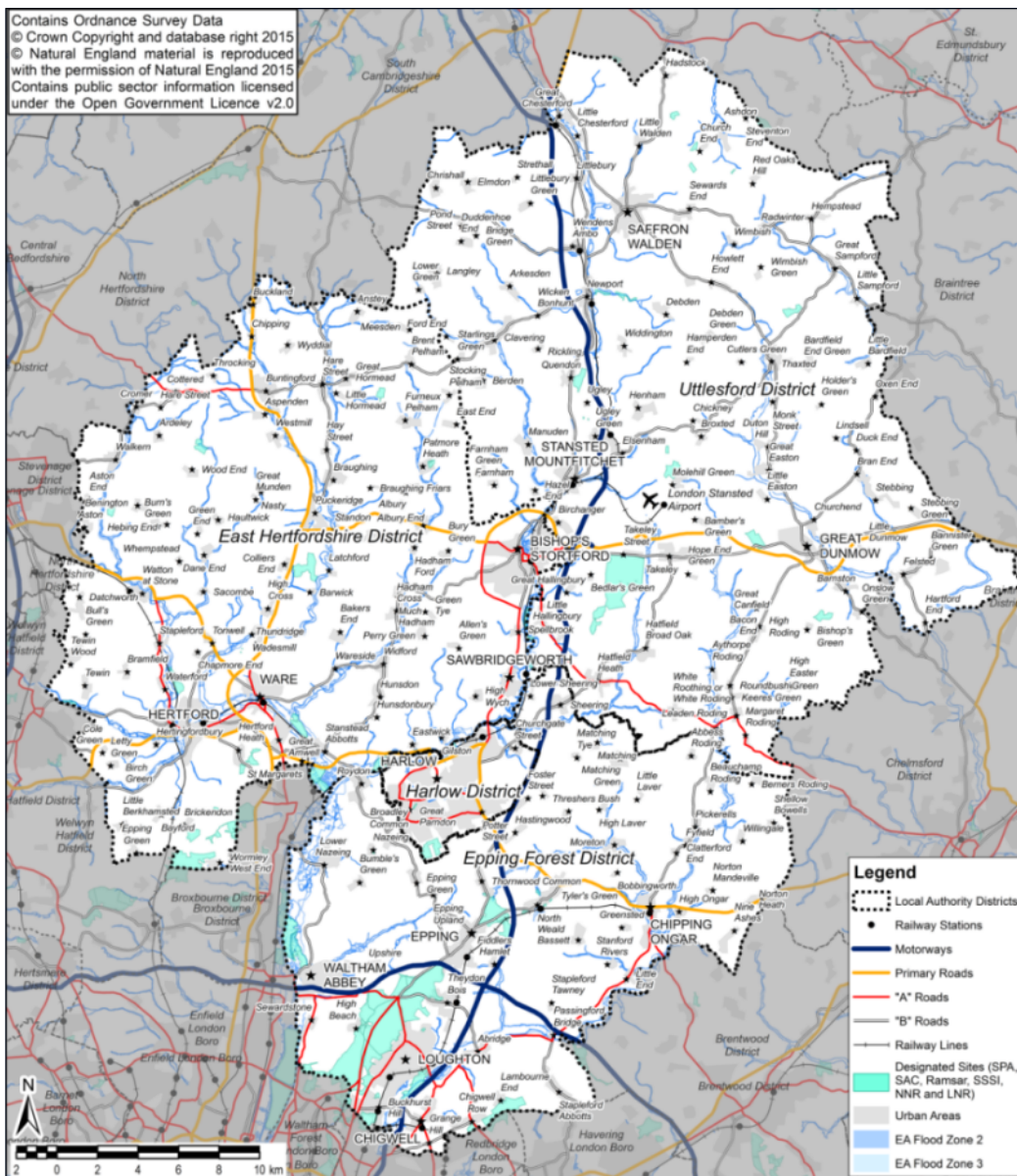
6 Appendices (for reference)

6.1 The following appendices are included for reference purposes only.

Appendix 1 – Background on the West Essex/East Hertfordshire HMA

- A1.1 The West Essex/East Hertfordshire HMA comprises the local authority Districts of East Hertfordshire, Epping Forest, Harlow and Uttlesford. It covers a total of approximately 574 square miles, and as at the 2011 Census, had a total population of 423,733 and a total of 181,336 dwellings.
- A1.2 A significant proportion is designated as Green Belt, and there are large portions of rural hinterland within the area, but also some larger and more urban settlements. The West Essex/East Hertfordshire HMA is centred on the large, 'new town' of Harlow, the biggest service centre within the area.
- A1.3 The West Essex/East Hertfordshire HMA also faces substantial pressure for development, due to population growth, and its proximity to London, and to major transport infrastructure such as the M25 and M11, the London Underground and Stansted Airport.

Figure 8 – The West Essex/East Hertfordshire area



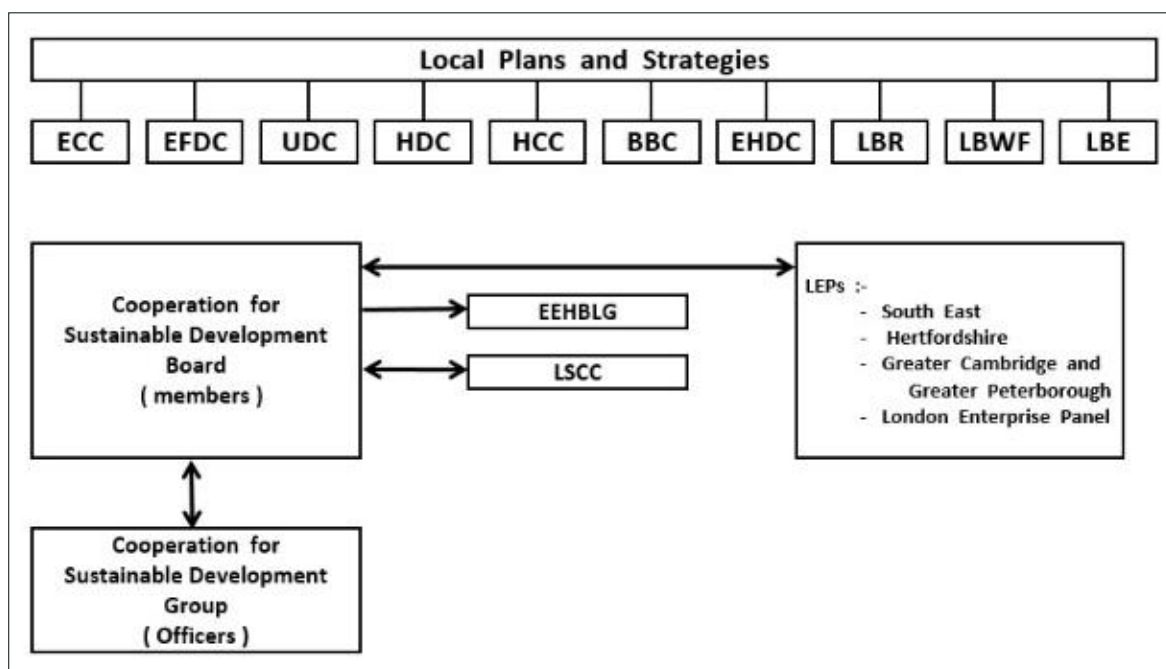
Appendix 2 – Details of the Co-op Member Board and Co-op Officer Group

- A2.1 The West Essex/East Hertfordshire Authorities form the core of the 'Co-operation for Sustainable Development Officer Group' (established February 2014, hereafter referred to as the 'Co-op Officer Group') and the 'Co-operation for Sustainable Development Member Board' (established October 2014, hereafter referred to as the 'Co-op Member Board').
- A2.2 The Co-op Member Board and Co-op Officer Group have been very important in helping to address cross-boundary issues, and they both now have many more members, including other adjacent local authorities, representatives from two County Councils, the Lee Valley Regional Park Authority, and the Corporation of London (Conservators of Epping Forest). The London Stansted Cambridge Consortium is also fully engaged and has been working with the four core authorities and Broxbourne Borough Council, and the Greater London Authority also has a watching brief.
- A2.3 Neither the Co-op Member Board nor Co-op Officer Group has formal decision making powers, however they both make recommendations to the constituent Councils, and to any cross boundary grouping of elected Members which has similar purposes. This approach has proved successful in furthering cross-boundary work and ongoing engagement.
- A2.4 The two groups have also proved a helpful platform for other bodies to engage with several authorities at once, for example the NHS, Highways England, and Thames Water. Both groups meet roughly every month to six weeks.

The Co-op Member Board

- A2.5 The 'Aims and Objectives' of the Co-op Member Board (from the Terms of Reference) are:
- "(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 Hertfordshire and the adjoining London Boroughs;
- and
- (2) The Board will support better integration and alignment of strategic spatial and investment priorities in West Essex, East Hertfordshire and adjoining London boroughs, ensuring that there is a clear and defined route through the statutory local planning process, where necessary."

Figure 9 – Governance structure of the Co-op Member Board



In this figure:

BBC = Broxbourne Borough Council

ECC = Essex County Council

EEHBLG = Enfield, Essex and Hertfordshire Border Liaison Group

EFDC = Epping Forest District Council

EHDC = East Hertfordshire District Council

HCC = Hertfordshire County Council

HDC = Harlow District Council

LBE = London Borough of Enfield

LBR = London Borough of Redbridge

LBWF = London Borough of Waltham Forest

LEP = Local Enterprise Partnership

LSCC = London Stansted Cambridge Consortium

UDC = Uttlesford District Council

- A2.6 The Co-op Member Board issued a joint statement on sign-off of the 2015 Joint SHMA and 2015 Joint Economic Report, which is available here:

<http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/532-shma-economic-growth-reports-co-op-board-joint-statement>.

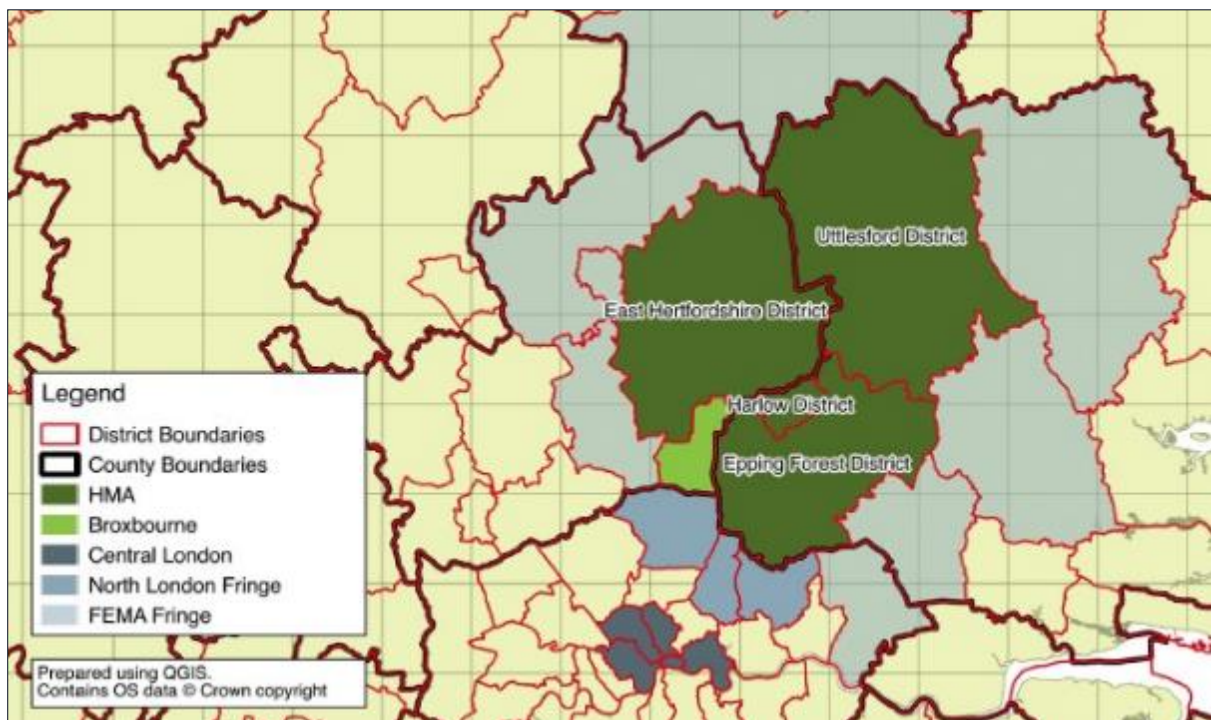
The Co-op Officer Group

- A2.7 The Terms of Reference for the Co-op Officer Group set out that the Group aims:
"To achieve effective co-operation between Councils 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.", by, '.... providing a forum across the county boundaries of Essex and Hertfordshire and Greater London for officers of participant councils to develop a shared understanding of community issues, to jointly review the options to achieve the needs of those communities, including growth, and to identify how they should co-operate to enable those needs to be met."

Appendix 3 – Joint Economic Report

- A3.1 The Joint Economic Report (2015, Hardisty Jones Associates, formal title: Economic Evidence to Support the Development of the OAHN for West Essex and East Hertfordshire) was commissioned by the Co-op Member Board on behalf of the West Essex/East Hertfordshire Authorities.
- A3.2 The 2015 Joint Economic Report found that Epping Forest District Council, East Hertfordshire District Council, Harlow District Council and Uttlesford District Council form an effective Functional Economic Market Area⁹, and so proceeded to assess economic need on that basis.

Figure 10 – The Functional Economic Market Area



- A3.3 The 2015 Joint Economic Report gave the following headline results for Objectively Assessed Economic Need (in net additional jobs per annum) for the Functional Economic Market Area as a whole, and for each local authority as a range of net additional jobs per annum, over the Local Plan period 2011-2033.

⁹ The Joint Economic Report highlighted some links from the Functional Economic Market Area to Broxbourne Borough Council, but concluded that it was not within the FEMA. Broxbourne BC had a 'watching brief' on the Joint Economic Report, and through the 'Co-operation for Sustainable Development Officer Group' and 'Co-operation for Sustainable Development Member Board', was involved in discussions about the Joint Economic Report brief and the results.

Figure 11 – Headline results from the Joint Economic Report (2015)

Local Authority	a) Projection based on historic share of total jobs	b) Projection based on likely future share of total jobs	OAEN range net new jobs per year 2011-2033
East Hertfordshire DC	505	435	435 – 505*
Epping Forest DC	400	455	400 – 455*
Harlow DC	325	335	325 – 335*
Uttlesford DC	665	675	665 – 675*
Total for FEMA	1,890	1,890	1,890 (same total for each projection)

NB – totals may not sum due to rounding

**These numbers express projected jobs growth as a range per year, for each local authority, for 2011-2033. This is because the Joint Economic Report analysed the projected jobs growth across the FEMA, then modelled apportioning the ‘share’ of jobs in two different ways:*

- a. based on the historic share of FEMA jobs that each authority had; and*
- b. based on the likely future share of FEMA jobs that each authority was likely to have (according to the projections).*

The Joint Economic Report then gave the range of these two numbers as the range for each authority. (The ‘a’ and ‘b’ do not signify the relative importance of one or other apportionment).

A3.4 The full 2015 Joint Economic Report is available to view at:
<http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/507-joint-economic-report>.

Appendix 4 – Strategic OAHN Spatial Options Study

Background

A4.1 The Strategic OAHN Spatial Options Study (“the Spatial Options Study”) was commissioned by the West Essex/East Hertfordshire Authorities to:

- facilitate the development of a memorandum of understanding between the West Essex/East Hertfordshire authorities, which sets out high level numbers and principles for distributing housing growth across the HMA (and which can be subsequently cited at Independent Examinations into the four constituent Local Plans)
- set out the strategic options for how the housing need identified in the SHMA (2015) could be distributed across the HMA, based on an analysis of the existing/emerging policy context and evidence base and provide an evidence-based commentary on the anticipated significant positive and negative impacts of each option relative to the others (including opportunities to deliver infrastructure, employment development, regeneration benefits, etc.) and potential mitigation measures (where relevant); and to assist in producing an MoU.

A4.2 The process of the study is shown in chapter 1 of this MoU.

Identification of the options

A4.3 The Spatial Options Study identified six ‘reasonable’ options, ‘A’ to ‘F’ as follows. Full details of the breakdown of dwellings over the four local authority areas is shown later in this MoU.

Figure 12 – The ‘Options’ in the Strategic OAHN Spatial Options study

Option	Details of this option	Rough total dwelling number for option (source of number)	Total dwellings* to be delivered 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

Option	Details of this option	Rough total dwelling number for option (source of number)	Total dwellings* to be delivered across the HMA 2011-2033
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
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

* These numbers differ from those in the 'Rough Total' column as they are based on the sum of units that actual potential sites could deliver, through the work on strategic sites in and around Harlow. The 'Rough Total' column is only based on the total dwelling numbers given in the SHMA, the 2012-based Household Projections and the 2014-based Sub-National Population Projections, i.e. as a SHMA-wide total not taking into account actual sites

** 'wider Harlow area' means in and around Harlow town, i.e. not just within Harlow District

▲ SHMA consultants ORS have estimated that the impact of the 2014-based Sub-National Population Projections, and 2012-based Household Projections could mean a rise in OAHN to approximately 54,600, but this number is not final. It has been tested through the Spatial Options Study in the interests of assessing what that number might mean for the HMA. Formal review of the OAHN number will take place through a full SHMA update in the future.

The 'Spatial Option'

- A4.4 The Spatial Options Study has identified that the 'Spatial Option' (a hybrid of some of those tested) is the most sustainable spatial distribution of OAHN across the HMA subject to the criteria listed at 3.1. and site availability, viability and deliverability
- A4.5 The 'Spatial Option' is based broadly upon each local authority meeting its OAHN within its own boundaries, and with medium-higher growth in the wider Harlow area. It comprises a total of approximately 51,100 dwellings in the Local Plan period 2011-2033. Broad details of the breakdown by local authority are in Figure 13. Full details of the breakdown are available within the Spatial Options Study.
- A4.6 The 'Spatial Option' dwelling total of approximately 51,100 represents 'planning positively for growth', as it is higher than both the established OAHN within the published 2015 SHMA (46,100), and the OAHN suggested by the 2012-based CLG household projections (49,638 dwellings). It is lower than the SHMA consultants ORS' estimated figure for emerging OAHN taking into account 2012-based Household Projections and the 2014-based Sub-National Population Projections (approximately 54,600), and lower than Option F (57,141) but it still makes good progress towards these higher figures.

Figure 13 – Details of Options A to F and the ‘Spatial Option’

Local authority	‘The Spatial Option’	Original ‘Reasonable Options’ as tested					
		Option A	Option B	Option C	Option D	Option E	Option F
East Hertfordshire DC	~ 18,000	Each authority meets its OAHN within its own boundaries (medium growth in and around Harlow)	Less development at Harlow and accelerated development on the A120 (lower growth in and around Harlow)	Less development at Harlow and two new settlements in East Hertfordshire (lower growth in and around Harlow)	Maximum growth at Harlow, with reduced allocations in constrained areas of the HMA (higher growth in and around Harlow)	Higher growth across the HMA, with allocations in constrained areas (maximum growth in and around Harlow)	Maximum growth across the SHMA area (maximum growth in and around Harlow)
Epping Forest DC	~ 11,400	16,789	15,289	18,289	16,264	18,389	20,299
Harlow DC	~ 9,200	11,093	8,943	8,943	10,313	12,993	14,152
Uttlesford DC	~ 12,500	7,900	7,900	7,900	7,900	7,900	9,175
		12,516	16,016	12,516	12,266	12,516	12,616
Housing Market Area Total	~ 51,100	48,298	48,148	47,648	46,743	51,798	56,242 + 759* 57,001
Within which - Greater Harlow total is	~ 16,100	14,150 (medium growth)	10,500 (lower growth)	10,500 (lower growth)	17,650 (higher growth)	17,650 (higher growth)	20,985 (maximum growth)

* Wider Harlow area means in and around Harlow town, i.e. not just within Harlow District

** This 759 consists of additional permissions/completions/windfalls which were identified after the testing of Options A to E was complete, but were available to test within option F.

Appendix 5 – Strategic Vision for LSCC Core Area

- A5.1 The following vision was prepared by the LSCC through working with representatives of East Hertfordshire District Council, Epping Forest District Council, Harlow District Council, Uttlesford District Council and Broxbourne Borough Council¹⁰. The five local authority areas form the LSCC 'Core Area'. Workshops for Members were held at an early stage in its preparation, and both Members and officers have been involved in its refinement. This joint Strategic Vision was presented to the Co-op Member Board, which agreed that each of the five local authorities within the LSCC 'Core Area' would include it within their individual Local Plans, alongside their own Local Plan level vision.
- A5.2 The Councils of Broxbourne, East Herts, Epping Forest, Harlow and Uttlesford form the LSCC Core Area which lies at the heart of the London Stansted Cambridge Corridor (LSCC). This corridor has, over the past decade or more, been the engine of UK growth with its world class industries and businesses.
- A5.3 Over the past five years the Corridor's dynamic, knowledge-based economy has grown at a rate almost double that of the UK average and as a result rates of population growth have increased. Transport links are excellent; with two major rail routes - the East Coast and West Anglia main lines - serving the Corridor. The A1(M), A10 and M11 motorways link its towns and cities with the capital, while London Stansted Airport offers international connections.
- A5.4 With a significant number of jobs in knowledge-based industries, the Corridor is a leading knowledge economy and a showcase for tech industries and firms. There is a high rate of innovation.
- A5.5 The Corridor accounts for 24,700 jobs in the life sciences sector contributing 11% of all national employment. This success is built on research institutes and notable firms and organisations, including Amgen and AstraZeneca in Cambridge, GlaxoSmithKline in Stevenage, and Public Health England in Harlow.
- A5.6 The continued success of the Corridor as a great place to live, work, do business and visit provides the opportunity for the Core Area to deliver greater and lasting prosperity for its residents and businesses. As such the Council is working with its partner authorities in the Core Area to deliver the following LSCC strategic vision for the area up to 2050:

Strategic Vision for the London Stansted Cambridge Corridor (LSCC) Core Area

- A5.7 *The Core Area will build on its 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 Stansted Airport, the local authorities will deliver sustainable growth which supports the economic ambitions of the LSCC and the UK 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;*

¹⁰ Although this MoU and the HMA cover only the four West Essex/East Hertfordshire Authorities, the MoU itself, the SHMA and Joint Economic Report, and the Spatial Options Study were discussed at the Co-op Member Board and the Co-op Officer Group, of which Broxbourne Borough Council is a member. Broxbourne BC officers and Members were also involved in the drafting and agreement of the LSCC 'Core Area' vision.

- *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 Forest National Nature Reserve;*
- *working with partners to protect and enhance the high quality environment, its unique landscapes and places of special wildlife value. This would be achieved by place-shaping initiatives which would include measures to conserve areas of high biodiversity; the provision of new, alternative green spaces for people and wildlife; and the increase of green infrastructure connections between these areas, to provide greater opportunities for more sustainable access to nature for everyone living in the corridor;*
- *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, A10 and M25; and 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; and*
- *the regeneration of existing urban areas including at Harlow, Waltham Abbey, Loughton and Waltham Cross.*

A5.8 *The Core Area supports the development and sustainable growth of Greater Harlow and key growth locations at Broxbourne, Brookfield and Bishop's Stortford together with Stansted Airport growing to its full permitted capacity and as a business growth hub. These centres, with proportionate growth throughout the wider area, and the right investment, would create an economic powerhouse.*

A5.9 *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, A414, A120 and A10 is a vital component of this.*

Appendix 6 – Governance and Roles (in relation to this MoU)

Appendix 6 A – Signatory organisations

The West Essex/East Hertfordshire local authorities

- A6a.1 The four local authorities form the core of the Co-op Member Board and Co-op Officer Group, and have several pieces of joint evidence in common, including the SHMA, Joint Economic Report, and the Spatial Options Study.
- A6a.2 The four authorities will continue to work together, and wish to use this MoU as a basis for making progress together, and on their individual Local Plans, in order to enable development to be provided in the most sustainable locations within the West Essex/East Hertfordshire area.

Appendix 6 B – Non-signatory organisations

Co-operation for Sustainable Development Member Board and Officer Group

- A6b.1 The Co-op Officer Group and the Co-op Member Board were both established in 2014, and provide a forum for the discussion of cross-boundary issues, the commissioning and management of joint studies, and the formation of recommendations to take back to the individual authorities who form its members. For more details on the working practises of these groups, see Appendix 2.
- A6b.2 The Co-op Member Board and Co-op Officer Group commissioned and oversaw the Joint SHMA, the Joint Economic Report, and the Spatial Options Study. All three of these studies, among others, inform this MoU.
- A6b.3 The Co-op Member Board also has overarching responsibility for the implementation and management of this MoU. The Co-op Officer Group will provide support in this matter, through monitoring the various aims and updating the Co-op Member Board regularly.

Essex County Council and Hertfordshire County Council (as Highways Authorities)

- A6b.4 Essex County Council covers fourteen unitary and district council areas, including the districts of Epping Forest, Harlow and Uttlesford. Hertfordshire County Council covers ten district council areas, including that of East Hertfordshire.
- A6b.5 Both County Councils have responsibility for many matters which are relevant to planning, including but not limited to: education and schools (including adult community education), highways and transport, health and social care, libraries, waste and minerals, and some strategic planning matters.
- A6b.6 Both Essex County Council and Hertfordshire County Council are key members of the Co-op Member Board and Co-op Officer Group, and provide support and guidance on cross-border issues.
- A6b.7 Essex County Council in particular contributes heavily to cross-border work on many different topics, including the Spatial Options Study, and has undertaken the Local Plan transport modelling for the West Essex/East Hertfordshire area, as well as more specific transport modelling, for example, for a new Junction 7A of the M11.

- A6b.8 Hertfordshire County Council produces its own transport modelling but the two County Councils work together to share information from their respective models, which is then fed into the other's model to help inform calculations. This is especially important as the West Essex/East Hertfordshire area crosses the county boundary between Essex and Hertfordshire.
- A6b.9 Although Essex and Hertfordshire County Council are not signatories to this MoU, as highways authorities their officers and Members have provided support in its drafting, and have been involved in its discussion at the Co-op Member Board and Co-op Officer group.
- A6b.10 Both county councils are signatories to the related cross-boundary Transport Infrastructure MoU regarding transport matters, along with the West Essex/East Hertfordshire Authorities.

Highways England

- A6b.11 Highways England (formerly the Highways Agency) is the government company charged with operating, maintaining and improving England's motorways and major 'A' roads (the strategic road network). For the West Essex/East Hertfordshire HMA these routes include the M11, A120 and M25.
- A6b.12 The Strategic Road Network is at the core of our national transport system. Its many arteries connect our major towns and cities, ensure commuters make it to work every day, connect businesses with their suppliers and customers, and help millions of us visit our friends and families.
- A6b.13 Highways England is a statutory consultee in the planning system. In discharging this responsibility, it acts as a proactive partner. Highways England will support economic growth, providing the conditions that help businesses to succeed and grow, facilitating new development around the road network, and supporting investment and trade.
- A6b.14 Highways England is not a signatory to this MoU, but its officers have provided support in its drafting, and are heavily involved in the related cross-boundary Transport Infrastructure MoU regarding transport matters, along with Essex and Hertfordshire County Councils, and the West Essex/East Hertfordshire Authorities.
- A6b.15 Once Local Plans are adopted, Highways England will continue to work with the West Essex/East Hertfordshire Authorities to ensure that its strategic planning is fully cognisant of their policies and proposals. 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 and shape investment priorities to improve the service for road users and 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.

London Stansted Cambridge Consortium

- A6b.16 The London Stansted Cambridge Consortium (LSCC)¹¹ was formed in June 2013 as a strategic partnership of public and private organisations covering the area north from the Royal Docks, Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the

¹¹ www.lsc.co

Lee Valley, the M11, A1 and A10 road, the East Coast and West Anglia Mainline rail corridors to Stevenage, Harlow and Stansted, and through to Cambridge and Peterborough.

- A6b.17 The consortium brings together public and private sector organisations which have the common aim of seeking economic growth, higher employment rates, providing places for people and business while preserving the quality and character of the corridor. It was formed to organise and promote what is a clear economic area, with strong inter-connections; commuting to work and learn patterns, clusters of industries and supply chains.
- A6b.18 The LSCC has supported the West Essex/East Hertfordshire Authorities in cross-boundary matters, particularly relating to the shared Vision for the LSCC Core Area (see section 4 of this MoU).

Advisory Team for Large Applications (ATLAS)

- A6b.19 Relevant elected Members from the Co-op Member Board have been involved in a series of workshops facilitated by the Homes and Communities Agency's Advisory Team for Large Applications (ATLAS)¹² aimed at specifically considering the issue of expansion in and around Harlow and role that potential strategic sites could play.
- A6b.20 A number of strategic expansion sites are coming forward as part of Local Plan processes. The precise distribution and scale of development from the sites will be subject to further evidence gathering, decision making and Independent Examination of Local Plans.

¹² www.atlasplanning.com

Appendix 7 – Key Member and Officer contacts

Figure 14 – Key Member and Officer contacts

Organisation	Contact name	Role	Email address
East Hertfordshire District Council	Cllr Linda Haysey	Leader of the Council	linda.haysey@eastherts.gov.uk
	Kevin Steptoe	Head of Planning & Building Control	kevin.steptoe@eastherts.gov.uk
	Claire Sime	Planning Policy Manager	claire.sime@eastherts.gov.uk
Epping Forest District Council	Cllr John Philip	Planning Policy Portfolio Holder	john.philip1@ntlworld.com
	Amanda Thorn	Principal Planning Officer	athorn@eppingforestdc.gov.uk
	Alison Blom-Cooper	Project Manager of the Local Plan	alison@fortismere-associates.co.uk
	Sarah King	Senior Planning Officer	sking@eppingforestdc.gov.uk
Harlow District Council	Cllr Danny Purton	Portfolio Holder for Environment	danny.purton@harlow.gov.uk
	Dianne Cooper	Planning & Building Control Manager	dianne.cooper@harlow.gov.uk
	Paul MacBride	Forward Planning Manager	paul.macbride@harlow.gov.uk
Uttlesford District Council	Cllr Susan Barker	Deputy Leader/Portfolio Holder for Environmental Services	cllrbarker@uttlesford.gov.uk
	Richard Fox	Planning Policy Team Leader	rfox@uttlesford.gov.uk
Essex County Council	David Sprunt	Strategy & Engagement Manager (Highways)	david.sprunt@essex.gov.uk
Hertfordshire County Council	Roger Flowerday	Development Manager (Highways)	roger.flowerday@hertfordshire.gov.uk
Highways England	Andy Jobling	Asset Development Manager	andy.jobling@highwaysengland.co.uk

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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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Duty to Cooperate
Memorandum of Understanding
East Herts Council and Broxbourne Borough Council

- 1.1. This memorandum of understanding establishes the outcomes of co-operation between East Herts Council and Broxbourne Borough Council with respect to strategic planning and development issues.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2. Parties to the Memorandum

- 2.1. The Memorandum is agreed by the following authorities:
 - East Herts Council
 - Broxbourne Borough Council

3. Limitations

- 3.1. The Local Authorities recognise that there might not always be full agreement with respect to all the issues on which they have agreed to cooperate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the

Local Authorities in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

4.1. The Memorandum has the following broad objectives:

- To help secure a consistent approach to strategic planning issues affecting East Herts Council and Broxbourne Borough Council.
- To identify and manage spatial planning issues that impact on both East Herts Council and Broxbourne Borough Council.
- To make sure that the local planning and development policies prepared by each local authority are, where appropriate, informed by the views of the other local authority. This will normally involve engagement in the preparation of Development Plans.
- To ensure compliance with the Duty to Co-operate.

5. Matters Agreed

5.1. The matters identified below have been discussed and agreed through a combination of Member and Officer level meetings between the two local authorities.

Housing Need

5.2 Both authorities have prepared Local Plans which seek to meet respective objectively assessed housing need figures in full. It is therefore agreed that neither authority requires assistance from the other to help meet objectively assessed housing needs.

Transport

5.3 In its representation to the East Herts Pre-Submission District Plan, Broxbourne Borough Council raised concerns regarding the fact that the highways mitigation measures required to deliver the full 10,000 homes at the Gilston Area have not been identified and that there are no trigger points for the delivery of known mitigation measures within the Plan period.

5.4 It is agreed between the two authorities that the mitigation required to deliver the full 10,000 home development is subject to further transport modelling which will be undertaken by Essex County Council. It is also agreed that trigger points for the delivery of highways mitigation measures can only be identified following further work on the delivery of other strategic scale developments in the Harlow area through the respective local plans of Harlow, Uttlesford and Epping Forest Councils.

5.5 It is also agreed that the outcomes of Broxbourne Council's emerging Transport Strategy may identify a need for further mitigation on the route of the A10 as it

passes through Broxbourne Borough. Both authorities will work with Hertfordshire County Council to deliver required schemes, including upgrades to Junction 25 of the M25.

- 5.6 Both authorities support the proposal to provide a cycle path along the New River from where it rises on the River Lea between Hertford and Ware, through Broxbourne, to its lower reaches within London. It is agreed that the two authorities will work together, with Thames Water and the London Borough of Enfield, in order to deliver this scheme.

Retail

- 5.6 It is agreed that East Herts Council will have an input into emerging proposals for an expanded Brookfield Centre which is located within Broxbourne Borough.

London Stansted Cambridge Corridor (LSCC) Core Area

- 5.7 East Herts Council and Broxbourne Borough Council are both members of the LSCC Core Area. As set out in the agreed LSCC vision, both Councils support the development of the strategic opportunity sites at Broxbourne Park Plaza, Brookfield and Bishop's Stortford.

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Duty to Cooperate
Memorandum of Understanding
East Hertfordshire District Council and North Hertfordshire District Council

- 1.1. This memorandum of understanding establishes the outcomes of co-operation between East Hertfordshire and North Hertfordshire District Councils with respect to strategic planning and development issues.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination.
- 1.4. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2. Parties to the Memorandum of Understanding ('the Memorandum')

- 2.1. The Memorandum is agreed by the following authorities:
 - East Hertfordshire District Council (EHDC / East Herts)
 - North Hertfordshire District Council (NHDC / North Herts)
- 2.2. The plans of EHDC and NHDC underwent Regulation 19 consultation and are being submitted to broadly similar timetables. It is **agreed** that the Memorandum covers relevant matters insofar as they relate to the preparation

of both authorities' local plans and will be submitted as part of the evidence base to the Local Plan examinations of both parties.

3. Limitations

- 3.1. The Local Authorities recognise that there might not always be full agreement with respect to all the issues on which they have agreed to cooperate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the Local Authorities in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

- 4.1. The Memorandum has the following broad objectives:
- To help secure a consistent approach to strategic planning issues affecting EHDC and NHDC.
 - To identify and manage spatial planning issues that impact on both EHDC and NHDC.
 - To make sure that the local planning and development policies prepared by each local authority are, where appropriate, informed by the views of the other local authority. This will normally involve engagement in the preparation of Development Plans.
 - To ensure compliance with the Duty to Co-operate.

5. Matters Agreed

- 5.1. The matters identified below have been discussed and agreed through a combination of Member and Officer level meetings between the two local authorities.

Housing Market Areas

- 5.2 The two Authorities **agree** that the strongest housing market connections are with other neighbouring authorities. In particular, the respective Strategic Housing Market Assessment's (SHMAs) identify that the 'best fit' Housing Market Areas are:
- East Herts, Uttlesford, Harlow and Epping Forest Councils
 - North Herts and Stevenage Councils
- 5.3 Notwithstanding this, both authorities **agree** that there are also strong connections with other neighbouring authorities. While the two SHMA documents follow similar methodologies, the supporting documentation behind the Stevenage/North Herts SHMA (Housing Market Areas in Bedfordshire in Surrounding Areas, December 2015) identifies Functional Housing Market Areas in addition to the 'best fit' Housing Market Areas.

- 5.4 The two authorities **agree** this work demonstrates that the north western portion of East Herts lies within the same Functional Housing Market Area as Stevenage as well as the majority of North Herts District.
- 5.5 The two authorities **agree** that, on a pro-rata basis, there would be an indicative objectively assessed housing need in this part of East Herts of approximately 1,000 homes.
- 5.6 Through its District Plan, EHDC has proposed some development in this area (notably land to the East of Stevenage for 600 homes).
- 5.7 Both authorities **agree** that a significant quantum of new housing on the edge of, but just outside, this Functional Housing Market area has been granted on appeal at Buntingford in advance of the submission of the East Herts plan. Due to these particular and specific circumstances, both authorities **agree** that these schemes should contribute towards requirements arising in the functional housing market area,
- 5.8 Both authorities **agree** that this approach would satisfactorily address the technical objection submitted by NHDC to EHDC's plan.

Housing Need

- 5.9 Both authorities **agree** they have determined their objectively assessed housing needs (OAHN) to a common methodology and that this appropriately addresses the requirements of the NPPF and planning practice guidance.
- 5.10 Both authorities have prepared Local Plans which seek to meet respective objectively assessed housing need figures in full. It is therefore **agreed** that neither authority requires assistance from the other to help meet objectively assessed housing needs.
- 5.11 Both authorities **agree** that well-planned extensions to existing settlements within and adjoining their respective districts form part of an appropriate strategy for development to meet future needs.

Rural issues

- 5.12 Both authorities **agree** that the approach to settlement hierarchy and rural areas beyond the Green Belt in each plan lead to a broadly consistent policy framework for rural northern Hertfordshire.

Transport

- 5.13 Both authorities **agree** to continue to work closely in order to identify and resolve any issues in relation to capacity of the A10, including the potential to upgrade the A10/London Road roundabout to the south of Buntingford which is likely to enhance traffic flows in that location.

- 5.14 Both authorities **agree** to continue to work closely in order to identify and resolve any issues in relation to the traffic implications of development in and surrounding Stevenage.

Education

- 5.15 It is **agreed** that existing and proposed development around Stevenage in EHDC and NHDC contributes to need for secondary education provision in the Stevenage school planning area..
- 5.16 It is **agreed** that EHDC and NHDC will continue discussions with relevant parties – including Hertfordshire County Council and Stevenage Borough Council - to ensure that the education needs of the Stevenage school planning area are met in the most appropriate way.

New Settlement

- 5.17 Both authorities **agree** that the proposed Gilston Area development, which forms part of the Harlow and Gilston Garden Town proposal, will meet a substantial proportion of East Herts' housing requirements in the current plan period but recognise that this scheme has been promoted for development by the landowners for a substantial number of years, before subsequently being identified with the East Herts Preferred Options District Plan in 2014. As such, a considerable amount of work had been undertaken in order to demonstrate that the scheme is deliverable.
- 5.18 In this context, both authorities **agree** that a new settlement in any additional or alternate location in either authority was not a 'reasonable alternative' for this round of plan-making.
- 5.19 Both authorities **agree** that providing for future housing needs beyond the current Plan periods will be challenging and that joint working (potentially also involving other neighbouring authorities) will be required in order to investigate the potential to deliver a new garden town or settlement(s) in a sustainable location that could meet a substantial proportion of the future housing needs of the respective authorities.

Rye Meads Wastewater Treatment Works (WwTW)

- 5.20 The Rye Meads WwTW is located within EHDC but serves a wide catchment including parts of NHDC. The WwTW is located within a nature conservation site of European importance. Both authorities **agree** that the policy approach set out in the East Herts plan, in concert with other relevant regulatory regimes and requirements, ensure that any future works at the Rye Meads WwTW to provide additional treatment capacity must occur in such a way as to ensure that there is no significant effect on the European site.

Duty to Cooperate
Memorandum of Understanding
East Herts Council and Stevenage Borough Council

- 1.1. This memorandum of understanding establishes the outcomes of co-operation between East Herts Council and Stevenage Borough Council with respect to strategic planning and development issues.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2. Parties to the Memorandum

- 2.1. The Memorandum is agreed by the following authorities:
 - East Herts Council
 - Stevenage Borough Council

3. Limitations

- 3.1. The Local Authorities recognise that there might not always be full agreement with respect to all the issues on which they have agreed to cooperate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the

Local Authorities in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

4.1. The Memorandum has the following broad objectives:

- To help secure a consistent approach to strategic planning issues affecting East Herts Council and Stevenage Borough Council.
- To identify and manage spatial planning issues that impact on both East Herts Council and Stevenage Borough Council.
- To make sure that the local planning and development policies prepared by each local authority are, where appropriate, informed by the views of the other local authority. This will normally involve engagement in the preparation of Development Plans.
- To ensure compliance with the Duty to Co-operate.

5. Matters Agreed

5.1. The matters identified below have been discussed and agreed through a combination of Member and Officer level meetings between the two local authorities.

Housing Market Areas

5.2 The two Authorities agree that the strongest housing market connections are with other neighbouring authorities. In particular, the respective Strategic Housing Market Assessment's identify that the 'best fit' Housing Market Areas are:

- East Herts, Uttlesford, Harlow and Epping Forest Councils
- North Herts and Stevenage Councils

5.3 Notwithstanding this, both authorities acknowledge that there are also strong connections with other neighbouring authorities. While the two SHMA documents follow similar methodologies, the supporting documentation behind the Stevenage/North Herts SHMA (Housing Market Areas in Bedfordshire in Surrounding Areas, December 2015) identifies Functional Housing Market Areas in addition to the 'best fit' Housing Market Areas. This work demonstrates that the north western portion of East Herts lies within the same Functional Housing Market Area as Stevenage as well as the majority of North Herts District.

5.4 Through its District Plan, East Herts Council has proposed some development in the north western area of the District (notably land to the East of Stevenage for 600 homes). However, due to the constraints that exist, both authorities recognise that it would be unsustainable to direct a level of development to this location that would be commensurate to the percentage of East Herts District that lies within the shared Functional Housing Market Area.

- 5.5 Nevertheless, it is agreed that development proposed on the edge of the Functional Housing Market Area, within East Herts District, will contribute towards housing need in this location. This development includes approximately 1,000 homes in Buntingford and 1,350 homes to the east of Welwyn Garden City.

Housing Need

- 5.6 Notwithstanding the issue identified above, both authorities have prepared Local Plans which seek to meet respective objectively assessed housing need figures in full. It is therefore agreed that neither authority requires assistance from the other to help meet objectively assessed housing needs.

Land East of Stevenage (Gresley Park)

- 5.7 It is agreed by both authorities that the principle of a sustainable level of development to the east of Stevenage should be supported.

Transport

- 5.8 The two authorities recognise that as a result of growth to the East of Stevenage, upgrades to the existing Gresley Way/A602 junction in Stevenage will be required. It is anticipated that this work will be funded by the developer of that site.
- 5.9 Development in the Stevenage area will also add additional pressure to the A602. A series of mitigation measures have been identified by Hertfordshire County Council (HCC), some of which have now received planning permission. When delivered this package of improvements will add extra capacity to the route and also improve journey times. The two authorities will continue to liaise closely with HCC on this issue.
- 5.10 It is also noted that AECOM undertook an analysis of the highways impacts of development to the East of Stevenage in June 2015. East Herts Council will be requesting an update to this work prior to Examination of its District Plan.

Education

- 5.11 It is noted that that Hertfordshire County Council objected to the Pre-Submission version of the North Hertfordshire Local Plan on the basis that the Council had not made sufficient provision for secondary education on land to the north of Stevenage. While HCC has not objected to the proposed Gresley Park development through the Pre-Submission consultation on the East Herts District Plan, it is recognised that development in this location contributes to need for secondary education in the Stevenage school planning area. HCC has already signed bi-lateral MoU's with both Stevenage and North Herts Councils which commits the relevant authorities to continuing discussions to find a solution to this issue.

- 5.12 It is therefore agreed that East Herts will also form part of the discussions to ensure that the education needs of the Stevenage school planning area are met in the most appropriate way.

New Settlement

- 5.13 Both authorities agree that providing for future housing needs beyond the Plan period will be challenging and that joint working (potentially also involving other neighbouring authorities) will be required in order to investigate the potential to deliver a new garden town in a sustainable location that could meet a substantial proportion of the future housing needs of the respective authorities.

6. Outstanding Matters

Design

- 6.1 In its representation to the East Herts Pre-Submission District Plan, Stevenage Borough Council raised concerns regarding a lack of reference to Stevenage Neighbourhood principles and design principles. In addition, concern was also raised in terms of outcomes from a meeting with the Hertfordshire Design Review Panel.
- 6.2 Notwithstanding these objections, it is agreed that these matters go beyond Plan-making, and as such, can be considered through the subsequent masterplanning process. It is agreed that Stevenage Borough Council will have the opportunity to contribute towards the masterplanning process.

Duty to Cooperate
Memorandum of Understanding
East Herts Council and Welwyn Hatfield Borough Council

- 1.1. This memorandum of understanding establishes the outcome of co-operation between East Herts Council and Welwyn Hatfield Borough Council with respect to strategic planning and development issues, with particular focus on land to the east of Welwyn Garden City.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Co-operation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2. Parties to the Memorandum of Understanding (“the Memorandum”)

- 2.1. The Memorandum is agreed by the following authorities:
 - East Herts Council (East Herts / EHC)
 - Welwyn Hatfield Borough Council (Welwyn Hatfield / WHBC)
- 2.2. The plans of EHDC and WHBC underwent Regulation 19 consultation and are being submitted to broadly similar timetables. It is agreed that the Memorandum covers relevant matters insofar as they relate to the preparation

of both authorities' local plans and will be submitted as part of the evidence base to the Local Plan examinations of both parties.

3. Limitations

- 3.1. The Local Authorities recognise that there might not always be full agreement with respect to all the issues on which they have agreed to co-operate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the Local Authorities in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

- 4.1. The Memorandum has the following broad objectives:
- To help secure a consistent approach to strategic issues affecting East Herts Council and Welwyn Hatfield Borough Council.
 - To identify and manage spatial planning issues that impact on both East Herts Council and Welwyn Hatfield Borough Council.
 - To make sure that the local planning and development policies prepared by each local authority are, where appropriate, informed by the views of the other local authority. This will normally involve engagement in the preparation of Development Plans and any relevant joint policies.
 - To make sure there is compliance with the Duty to Co-operate.

5. Matters Agreed

- 5.1. The matters identified below have been discussed and agreed through a combination of Member and Officer level meetings between the two local authorities.

Housing Need

- 5.2. Both Authorities have prepared Local Plans which seek to meet respective objectively assessed housing need figures in full. It is therefore agreed that neither authority requires assistance from the other to help meet objectively assessed housing needs.

Housing Market Areas

- 5.3. The two Authorities agree that while the strongest housing market connections are with other neighbouring authorities, there is a shared functional housing market area (HMA) which relates to the A414 corridor between Hertford and Welwyn Garden City and the rural hinterland around Welwyn garden City within East Herts.
- 5.4. Recognising the relationship between Hertford and Welwyn Garden City and the resultant shared HMA, both local plans are seeking to accommodate dwellings within this shared housing market area through the development of

land to the east of Welwyn Garden City of 2,550 homes, of which 1,350 will be within East Herts.

- 5.5. There is no set figure assigned to the shared HMA in the WHBC SHMA report. However, there is a mutual acknowledgement of the physical constraints preventing further growth in this location beyond what is currently proposed. Therefore, the two Authorities agree that it is necessary to seek to meet the needs of this HMA from a wider area, and that by locating development in more suitable locations, the East Herts District Plan is seeking to plan positively in this respect.

Gypsy and Traveller Provision

- 5.6. Both authorities have prepared local Plans which seek to meet respective identified needs for Gypsies and Travelling Showpeople. It is therefore agreed that neither authority requires assistance from the other to help meet objectively assessed needs.
- 5.7. Furthermore, the two authorities have agreed that a shared evidence base would be useful at the plan review stage to take into account the needs from a wider area, particularly to address transit requirements on a more strategic scale.

Employment

- 5.8. Related to the shared housing market area, there are clear relationships in terms of employment and travel to work, facilitated by the A414 corridor. As a key employment destination, Welwyn Hatfield has a wide reaching Functional Economic Market Area. In order to take advantage of the connections between Hertford and Welwyn Garden City and the key highway routes, both authorities agree that locating a new employment area along the B195, central to the proposed site allocation of land to the East of Welwyn Garden City will contribute towards creating a sustainable community.

Transport

- 5.9. Both authorities agree to continue to work closely in order to identify and address any issues in relation to capacity of the A414 and the wider strategic road network, in collaboration with Hertfordshire Highways and Highways England where appropriate. Both authorities also agree to work closely to identify opportunities to improve sustainable means of travel where possible.

Education

- 5.10. Both authorities agree to continue to work closely to identify and address any issues in relation to educational needs arising from development, in collaboration with Hertfordshire County Council.

Infrastructure

- 5.11. Both authorities agree to continue to work closely to identify and address any issues relating to strategic infrastructure arising from development, in collaboration with infrastructure providers as necessary.

Community Facilities, Leisure, Sports and Recreation

- 5.12. Both authorities agree to continue to work closely to identify and address any issues relating to community facilities, leisure, sport and recreation needs arising from development, in collaboration with infrastructure providers as necessary.

Approach to Plan reviews

- 5.13. Both authorities agree that providing for future housing needs beyond the current Plan periods will be challenging and that joint working (potentially also involving other neighbouring authorities) will be required in order to investigate the potential to deliver a new garden town or settlement(s) in a sustainable location that could meet a substantial proportion of the future housing needs of the respective authorities.
- 5.14. The two authorities have discussed and agreed the virtue of writing into each Plan the need for a review of the evidence base behind each local plan at the stage it is reviewed. This new evidence should focus on more strategic issues such as wider housing and economic development needs, infrastructure and Gypsies and Travellers and Travelling Showpeople.
- 5.15. Both authorities have made reference to the potential need to review their respective local plans (WHBC paragraph 27.29, EHC Policy DPS5). Following a Duty to Co-operate meeting in November 2016, East Herts Council agreed to suggest minor modifications to this policy to include reference to updating evidence bases as appropriate, which may include cross-boundary working, where relevant.

Duty to Cooperate
Memorandum of Understanding
East Herts Council and Hertfordshire County Council (Education)

- 1.1. This memorandum of understanding establishes the outcomes of co-operation between East Herts Council and Hertfordshire County Council with respect to education issues.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2. Parties to the Memorandum

- 2.1. The Memorandum is agreed by the following authorities:
 - East Herts Council
 - Hertfordshire County Council (HCC)

3. Limitations

- 3.1. The Local Authorities recognise that there might not always be full agreement with respect to all the issues on which they have agreed to cooperate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the

Local Authorities in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

- 4.1. The Memorandum has the following broad objectives:
- To demonstrate that the District Plan has been informed by the views of the other local authority.
 - To ensure compliance with the Duty to Co-operate.

5. Matters Agreed

- 5.1. The matters identified below have been discussed and agreed through Officer level meetings between the two local authorities.
- 5.2. The areas where there is agreement with regards to the proposed development strategy are identified on a settlement specific basis below.

Bishop's Stortford

- 5.3. As part of its representations to the Pre-Submission District Plan, HCC objected to the proposed strategy for Bishop's Stortford on the basis that Policy BISH6 does not identify that part of the site will be required to deliver a 1FE expansion to Thorley Hill Primary School.
- 5.4. It is agreed that a minor amendment to the policy is required in order to reflect the wording of Paragraph 5.3.15 which does confirm that land should be set aside for the expansion of Thorley Hill Primary School. It is therefore agreed that this objection has been resolved.
- 5.5. In addition, HCC also objected to the fact that Policy BISH3 requires that the new 6FE Secondary School in this location should have the potential to expand to 8FE. However, as planning permission has been given for a 6FE school, with no expansion potential, and that development has now commenced, this reference should be removed. It is agreed that reference to an expanded 8FE school can be removed as a minor amendment. It is therefore agreed that this objection has been resolved.

Hertford

- 5.6. It is agreed that the requirement for additional primary education provision in Hertford can be met through the expansion of existing schools.
- 5.7. It is agreed that preferred approach to secondary education is to provide a new school as part of development to the North and East of Ware.

Ware

- 5.8 As referred to in Paragraph 5.7, it is agreed that preferred approach to secondary education is to provide a new school as part of development to the North and East of Ware.

Sawbridgeworth

- 5.9 As part of its representations to the Pre-Submission District Plan, HCC objected to the proposed strategy for Sawbridgeworth on the basis that Land to the North of Sawbridgeworth (SAWB4) has been identified for development in the period 2022 - 2027, whereas the expansion of Mandeville Primary School has been identified for 2017 – 2022. In the view of HCC, all three proposed developments in the town would need to provide financial contributions towards the school expansion in order to it to be considered deliverable.
- 5.10 Following further discussions, it is agreed that the SAWB4 could be delivered earlier than anticipated, should a willing developer come forward in a timely manner. It is also agreed that, should SAWB4 be developed after 2022, there is potential for HCC to part fund the school expansion, before being reimbursed by the developers of SAWB4 at a later date. It is therefore agreed that this objection has been resolved.

East of Stevenage

- 5.11 It is agreed that provision should be made for a 2FE primary school in this location. In terms of secondary provision, it is agreed that East Herts will continue to work with HCC, as well as Stevenage and North Herts Councils, in order to identify the most suitable solution for meeting cumulative needs in the Stevenage area

East of Welwyn Garden City

- 5.12 As part of its representations to the Pre-Submission District Plan, HCC objected to the proposed strategy for East of Welwyn Garden City on the basis that Policy EWEL1 does not identify that the primary school located within the East Herts element of the site should be able to be expanded to 3FE.
- 5.13 It is agreed that a minor amendment to the policy is required in order to reflect the wording of Paragraph 13.2.4 which does confirm that provision should be made for the school to expand to 3FE should future needs arise. It is therefore agreed that this objection has been resolved.
- 5.14 It is agreed that the approach to secondary provision is sufficient, in that a 6FE school will be provided that can be expanded to 8FE.

Villages

- 5.15 As part of its representations to the Pre-Submission District Plan, HCC objected to the proposed strategy for the villages on the basis that it was unclear how much development would be provided in each location, and therefore whether further education capacity would be required.
- 5.16 However, following further discussions, it is now agreed that the amount of development proposed within Group 1 villages located in the Rural Area Beyond the Belt (Braughing, Hunsdon, Much Hadham, Standon & Puckeridge and Walkern) is identified by Table 10.1 in the District Plan, and that this forms an adequate basis for education planning. It is also agreed that much of the development proposed has already received planning permission, and that it is unlikely that emerging Neighbourhood Plans for these areas would propose further development.
- 5.17 For those Group 1 villages within the Green Belt (Watton-at-Stone, Hertford Heath and Stanstead Abbots & St Margaret's), there is no identified growth figure in the District Plan. Any development that is proposed in these locations within Neighbourhood Plans is likely to be very limited in nature. It is agreed that Watton-at-Stone Primary School does have potential to expand. It is also agreed that Hertford Heath and St. Andrews (Stanstead Abbots) Primary Schools have no further capacity at present and are unable to expand, and that this should be considered as part of the Neighbourhood Plan process.
- 5.18 It is therefore agreed that this objection has been resolved.

6. Outstanding Matters

- 6.1 In addition to the Matters Agreed above, there are a number of outstanding matters that need to be resolved. Again, these are identified on a settlement specific basis below.

Bishop's Stortford

- 6.2 As part of its representations to the Pre-Submission District Plan, HCC objected to the proposed strategy for Bishop's Stortford on the basis that Policy BISH4 (Hadham Road) requires that part of the site should be retained as playing pitches. HCC would like the policy to be amended in order to allow the whole site to be made available for residential development. As part of the Bishop's Stortford North planning application, HCC applied for the development of the Hadham Road site through three contiguous applications covering three parts of the site (Part A, B and C). Part B was progressed and permission granted. Subsequent to the District Plan consultation HCC have appealed against the basis of non-determination of applications A and C. It is anticipated that these will be heard by the Planning Inspector at an appeal Inquiry in the summer of 2017.

- 6.3 In addition, HCC has also objected to Policy BISH6 (Bishop's Stortford High School Site) which requires that the existing playing pitches should be retained. HCC has indicated that new playing pitches would be provided as part of the re-location of the High School to BISH5, and as such, retention of the existing pitches should not be required.

Buntingford

- 6.4 Policy BUNT2 of the District Plan allocates a site for a new First School which is required as a result of the cumulative impact arising from a number of sites that have received planning permission on the periphery of the town. While HCC welcomes the positive approach that East Herts has taken with regards to the identification of a school site, the County Council is currently undertaking work in order to identify the most suitable site for a new First School and therefore cannot support BUNT2 at present until this work is complete.

Gilston Area

- 6.5 Policy GA1 requires the provision of 14FE of Secondary education and 15FE of Primary education in order to cater for the needs of the full 10,000 home development. This assessment was undertaken using HCC's child yield model and was based on assumptions with regards to housing type, tenure and phasing. However, given that the Plan is still emerging, and that definite information regarding these inputs will not be forthcoming until more detailed masterplanning has taken place, HCC is of the view that Policy GA1 should require up to 20FE of provision for both primary and secondary education based on their standard formula of 1FE per 500 dwellings.

Sawbridgeworth

- 6.6 While not objecting to the Plan, HCC has suggested that the site area of Policy SAWB5 should be amended to reflect the fact that Leventhorpe School own part of the site, and that it is intended that this land is used to allow for the expansion of the school.

Ware

- 6.7 HCC has objected to Policy WARE2 on the basis that it does not present a clear strategy for primary school provision in this location. In the view of HCC the policy should present two scenarios. The first scenario is for a new 2FE school is provided to meet the needs of 1,000 homes, which can be expanded to 3FE to meet the needs of the additional 500 homes should they be provided. The second scenario is for a new 2FE school, plus the expansion of Priors Wood Primary School by 1FE if required.
- 6.8 While all of the matters detailed above are not resolved, the two authorities will continue to work together over the coming months in order to identify the most appropriate solutions.

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Duty to Cooperate
Memorandum of Understanding
East Herts Council and Hertfordshire County Council (Transport)

- 1.1. This memorandum of understanding establishes the outcomes of co-operation between East Herts Council and Hertfordshire County Council with respect to transport issues.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2. Parties to the Memorandum

- 2.1. The Memorandum is agreed by the following authorities:
 - East Herts Council
 - Hertfordshire County Council

3. Limitations

- 3.1. The Local Authorities recognise that there might not always be full agreement with respect to all the issues on which they have agreed to cooperate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the

Local Authorities in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

- 4.1. The Memorandum has the following broad objectives:
- To demonstrate that the District Plan has been informed by the views of the other local authority.
 - To ensure compliance with the Duty to Co-operate.

5. Matters Agreed

- 5.1. The matters identified below have been discussed and agreed through a combination of Member and Officer level meetings between the two local authorities.

Development Strategy

- 5.2 Overall, the County Council does not object to the quantum and location of development proposed within the District Plan. The two authorities have engaged pro-actively on transport matters through the Plan making process, both through bi-lateral meetings and through the Co-operation for Sustainable Development Board (the Co-op Board).
- 5.3 It is agreed that, where concerns have been raised by Hertfordshire County Council, East Herts Council has responded in a positive matter and has amended the development strategy in order to ensure that it is acceptable in transport terms.
- 5.4 For all proposed development sites, the County Council does not have any in principle objections with regards to access. However, further discussions will be required as part of more detailed design work and the planning application process.

COMET Modelling

- 5.5 In order to inform the plan making process, Hertfordshire County Council has developed a strategic county-wide transport model known as COMET. The model, which takes into account proposed growth across Hertfordshire, identifies areas that are likely to suffer from congestion, and therefore, where mitigation measures may be required. Outputs from the model have informed the development strategy as well as the mitigation proposals contained within the Infrastructure Delivery Plan.

Hertford and Ware

- 5.6 Advice from Hertfordshire County Council, initially received in July 2015 and supplemented by further information in January 2016, stated the capacity of the

A414 through Hertford to cater for future growth was limited. Based on the housing trajectory contained within the District Plan, the County Council consider that the A414 can support planned growth identified within the first seven years up to 2024. Beyond that date a strategic solution, potentially in the form of a Hertford bypass, will be required to deliver further growth in the Hertford and Ware area. The County Council is currently reviewing the Hertfordshire Local Transport Plan

- 5.7 In respect of development to the North and East of Ware, the two authorities have worked closely in order to identify a quantum and phasing of development that would be acceptable in highways terms. As a result of these discussions, a total of 1,000 dwellings are proposed within the Plan period, including 300 dwellings between 2022 and 2027. A further 500 dwellings are proposed beyond 2033 subject to suitable highways mitigation.

East of Welwyn Garden City

- 5.8 It is agreed that, while a proportion of traffic movements emanating from the site will flow eastwards along the A414 towards Hertford where there are known capacity issues, any such impacts are considered to be acceptable in highway terms. It is also agreed that further mitigation may be required to address impacts on the B195 and A1(M). Further discussions are required between East Herts, Welwyn Hatfield Council and the County Council, with regards to site access and access to the existing household waste recycling centre at Cole Green.

East of Stevenage

- 5.9 It is agreed that the existing road network will be able to cater for development in this location, subject to the necessary upgrade works to the Gresley Way/A602 junction. Further, more detailed modelling is currently being commissioned in order to assess the impact of having three points of access onto Gresley Way (with potential for a fourth in order to access the Travelling Showpeoples site).

Gilston Area

- 5.10 Hertfordshire County Council has not objected to the provision of 10,000 dwellings in this location. The required strategic mitigation measures required to deliver approximately 3,000 homes within the Plan period have been identified as part of ongoing work with the Co-op Board partners. These measures are reflected in the separate Co-op Board Transport MoU.
- 5.11 Given current uncertainty with regards to development locations and timescales within neighbouring authorities in the wider Harlow area, it is agreed that at present, it is not clear when each of the key pieces of infrastructure will be required. Further modelling work, using the Essex County Council VISUM model, will resolve these uncertainties moving forward.

- 5.12 It is also agreed that further modelling work, using both the Hertfordshire County Council COMET model and the Essex County Council VISUM model, will be required in order to identify further mitigation measures which might be required to deliver a further 7,000 homes post 2033. Potential solutions may include a Harlow Northern Bypass. The County Council is commencing work in order to assess potential strategic highway solutions on the entire A414 corridor, including a Harlow Northern Bypass and a Hertford Bypass.
- 5.13 Both authorities will continue to work with their partners as part of the Co-op Board in order to deliver a Sustainable Transport Corridor running from the Gilston Area, through Harlow town centre, to potential new development to the south of the town with Epping Forest District.

Bishop's Stortford

- 5.14 The County Council will continue to be involved in the preparation of the Bishop's Stortford Town Centre Framework. In part, this document will identify potential mitigation measures to help alleviate existing traffic concerns in the town centre.
- 5.15 The Co-op Board Transport MoU also refers to the need to deliver an upgraded Junction 8 and associated works on the A120.
- 5.16 The County Council does not object to the proposed location and quantum of development within Bishop's Stortford.

Sawbridgeworth

- 5.17 In the earlier stages of plan making, Hertfordshire County Council indicated that the provision of more than approximately 500 homes in Sawbridgeworth would require a bypass of the town. It is agreed that this advice remains extant subject to further transport modelling, and as such, provides a suitable basis for shaping the development strategy for the town.
- 5.18 The County Council does not object to the proposed location and quantum of development within Sawbridgeworth, subject to the delivery of an upgraded West Road/Station Road/A1184 junction.

Buntingford and Rural Areas

- 5.19 East Herts is not proposing any further development within Buntingford. The County Council does not object to the level of development proposed for the rural area.

6. Outstanding Matters

- 6.1 The two authorities will continue to work together, both through the Co-op Board and bi-laterally on further transport modelling. Joint working will also

continue as part of more detailed design work encompassing issues such as site access.

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Duty to Cooperate
Memorandum of Understanding
East Herts Council and the Environment Agency

- 1.1. This memorandum of understanding establishes the outcomes of co-operation between East Herts District Council and the Environment Agency with respect to strategic planning and development issues.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2. Parties to the Memorandum

- 2.1. The Memorandum is agreed by the following authorities:
 - East Hertfordshire District Council
 - Environment Agency

3. Limitations

- 3.1. It is recognised that there might not always be full agreement with respect to all the issues on which they have agreed to cooperate. For the avoidance of doubt the Memorandum will not restrict the discretion of any organisations in the

determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

4.1. The Memorandum has the following broad objectives:

- To help secure a consistent approach to strategic planning issues affecting East Hertfordshire District Council and the Environment Agency,
- To identify and manage spatial planning issues that impact on both East Hertfordshire District Council and the Environment Agency.
- To make sure that the local planning and development policies prepared by each local authority are, where appropriate, informed by the views of the other local authority. This will normally involve engagement in the preparation of Development Plans.
- To ensure compliance with the Duty to Co-operate.

5. Matters Agreed

5.1. The matters identified below have been discussed and agreed having had regard to comments received during the various consultation stages undertaken throughout the preparation of the District Plan as well as Officer level meetings.

Proposed Site Allocations

5.2 A number of proposed allocations contained within the District Plan are partially located within either Flood Zone 2 or 3, namely; the Goods Yard (BISH7), Old River Lane/Causeway (BISH8) and the Mill Site (BISH10) in Bishop's Stortford, and Mead Lane (HERT2) in Hertford.

5.3 Through the Environment Agency's response to the Pre-Submission consultation, it was agreed that there is an evidence base to justify the allocation of BISH7, BISH8 and HERT2. For each of the sites the evidence base consists of the following:

- A Sequential Test which justifies that there are no reasonable alternatives to the proposed allocation.
- A Level 2 Strategic Flood Risk Assessment (SFRA).

5.4 With regards to BISH10, the Mill Site, the Environment Agency objected on the basis that neither the Sequential Test nor a Level 2 SFRA had been undertaken. However, following the consultation, this work was undertaken to the satisfaction of the Environment Agency. It is therefore agreed that this objection has been resolved and that there is sufficient evidence to justify the site's inclusion in the District Plan as a proposed allocation.

5.5 It is also agreed that, for all four sites, a site specific Sequential Test should be carried out at the planning application stage in order to ensure that

development is located in those areas that are at the lowest risk of flooding. In addition a site specific Flood Risk Assessment, which takes account of the Level 2 assessments already undertaken, will be required at the planning application stage.

Development Management Policies

- 5.6 Agreement has been reached between the Council and the Environment Agency on the wording of a number of policies contained in the District Plan. In their response to the Pre-Submission consultation, the Environment Agency has made some suggestions that they feel would improve policy wording in some areas. It is therefore agreed that these suggestions can be discussed further prior to adoption of the District Plan, where such changes would not be 'material' in nature.

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**Duty to Co-operate
Memorandum of Understanding
East Herts Council and Historic England**

- 1.1. This memorandum of understanding establishes a framework for co-operation between East Herts Council and Historic England with respect to strategic planning and development issues, with particular focus on the historic environment related to the proposed District Plan allocations to the east of Welwyn Garden City (Policy EWEL1), west of Hertford (Policy HERT3) and in the Gilston Area (Policy GA1).
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Co-operation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.
- 1.4. This Memorandum of Understanding (MoU) has been prepared in the context of the publication version of the East Herts District Plan (2011-2033) which was placed on public deposit for a six week period ending 15th December 2016 (hereafter “the Plan”). The MoU was prepared in January 2017 in the period leading up to the planned submission of the plan to the Secretary of State for independent examination.

2. Parties to the Memorandum

2.1. The Memorandum is agreed by the following authorities:

- East Herts Council (hereafter “the Council”)
- Historic England

2.2. We the undersigned, set out in this memorandum those matters of joint strategic interest to both authorities as they are dealt with in the East Herts District Plan, in accordance with paragraph 181 of the National Planning Policy Framework, March 2012.

2.3. It is important to place on record that discussions between the two authorities have embraced the full range of strategic cross-boundary matters covered by the Duty to Co-operate. Both authorities are content that the Duty to Co-operate has been met thus far and ongoing liaison will ensure that this continuing liaison will be effectively addressed.

3. Limitations

3.1. The Parties recognise that there might not always be full agreement with respect to all the issues on which they have agreed to co-operate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the Parties in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

4.1. The Memorandum has the following broad objectives:

- To help secure a consistent approach to strategic planning and development issues.
- To identify and manage spatial planning and heritage issues that impact on heritage assets and the historic environment within East Herts District.
- To make sure that the local planning and development policies prepared by the local authority are, where appropriate, informed by the views of the Historic England and that there are agreed channels of communication between both parties in relation to proposed amendments to the Pre-Submission District Plan.
- To make sure that decisions on strategic planning applications are informed by the views of both authorities by setting up an agreed approach to continued early engagement in the masterplanning of strategic sites.
- To identify and agree the need for and approach to undertaking further technical evidence to inform the submission of the District Plan and/or the examination of the District Plan.
- To make sure there is compliance with the Duty to Co-operate.

5. Matters Agreed

5.1. Engagement between the two authorities under the Duty to Co-operate has focussed on the location and quantum of development and the approach towards heritage assets and the historic environment policies within the East Herts District Plan. A summary of the discussions which have taken place between the authorities so far are listed in Section 8 below, while minutes of Duty to Co-operate meetings are included in Appendix 1. These have highlighted the following matters upon which both authorities agree or have an agreed approach to resolving:

- **District Plan**

Historic England has been engaged throughout the Plan-making process through various means such as through discussion on early stages of site assessment and shortlisting, through to drafting the District Plan policies.

- **District Plan Evidence Base**

Historic England has been involved in the production of the Heritage Impact Assessment for Panshanger Park and its Environs, from providing assistance in preparing the Technical Study Brief, appraisal of the proposed methodology and at the draft and final reporting stages.

6. Outstanding Matters

6.1 Historic England made representations to the Pre-Submission District Plan. The Council met with Historic England (and Welwyn Hatfield Borough Council Officers) on the 23rd January to discuss their comments and have agreed the following approach:

- **Sustainability Appraisal**

Historic England made comments on the Pre-Submission District Plan consultation raising concern about the Sustainability Appraisal (SA) supporting the District Plan. They have concern that the SA does not give sufficient weight to the importance of the historic environment in its consideration of the alternatives, or indeed in the appraisal of the proposed Plan approach.

The Council's Sustainability Appraisal consultants have been invited to respond to the comments made by Historic England and the Council will act as the intermediary in discussions in regard to the Sustainability Appraisal.

- **Bishop's Stortford**

Historic England request that Policy BISH5 (Bishop's Stortford South) elaborates point (o) to refer to Wallbury Camp, and to set out a mitigation approach which includes careful layout, design and planted screening. Officers agree that this would be proposed as a minor change to the Plan when submitted to the Planning Inspectorate in due course.

- **Buntingford**

Historic England request that Policy BUNT1 (Development in Buntingford) be amended to clarify that development is only appropriate where it protects or enhances the historic environment. As the Plan is intended to be read as a whole, it is agreed that the addition of the word 'appropriate' would be proposed as a minor change to the Plan: "in accordance with Policy DPS3 (Housing Supply 2011-2033), appropriate development proposals will be permitted...". It was agreed with Historic England that this was a suitable way forward.

- **Hertford**

Historic England request that Policy HERT2 (Mead Lane Area) references the grade II listed Hertford East Station. At the meeting on 23rd January 2017, Historic England further elaborated that reference to the Mead Lane Urban Design Framework (UDF), which refers to the importance of the station would be insufficient, and that specific elements of the UDF should be referred to within the policy to make it explicit. However, the area of Mead Lane which is subject to this allocation is separated from the station setting by virtue of a recent development to the north of the station (3/15/0413/FUL), to which Historic England responded to say that it wished to make no comment and did not wish to be consulted again on the application. Due to the juxtaposition of this development between the station and the remaining development area, it is considered unlikely that there would be any impact on the station. The UDF already sets the parameters for urban realm improvements that may be occasioned by any alteration of the highway mitigation through further development in the area. This is supplemented by the provisions of the Hertford Town Centre Urban Design Strategy, where Policy HERT7 (Hertford Town Centre Urban Design Strategy) applies. This has the potential to impact positively on the setting of the station through townscape improvements connecting the station to the town centre.

Historic England was pleased that, further to their representations to the Preferred Options District Plan, East Herts and Welwyn Hatfield Councils had jointly commissioned a Heritage Impact Assessment of Panshanger Park and its Environs. However, in response to the Pre-Submission consultation, Historic England raises concerns that the sites to the West of Hertford (Policy HERT3) and East of Welwyn Garden City (Policy EWEL1) would have the potential to impact on the heritage assets and the wider historic landscape, including the open landscaped Grade II* listed Panshanger Park and the Grade I landscape around Hatfield House.

Whilst it is noted that Historic England does not object to the principle of development to the west of Hertford, it does seek to ensure that appropriate mitigation is provided to address the relationship and proximity of the two sites and the eastern edges of the Park. The southern site to the west of Thieves Lane has historically formed a continuation of the rural parkland and agricultural character of the Park. Therefore, it is important that an appropriate buffer zone should be maintained between the development and the boundary of the Park, and measures taken to minimise the traffic using the B1000 (Hertford Road) and Thieves Lane, as this would have the potential to

be detrimental to the rural quality of the north-eastern edges of the Park. It is considered that the provisions of Policy HERT3 will address all of these issues and dialogue with the land promoters of each site has occurred on these matters. It is therefore considered that these concerns can be successfully addressed through the masterplanning process.

- **East of Welwyn Garden City**

Historic England is concerned that the Heritage Impact Assessment of Panshanger Park and its Environs undertaken to inform the East Herts District Plan and the Welwyn Hatfield Local Plan had not taken account of land immediately adjoining the western edge of Panshanger Park adjacent to the former Panshanger Aerodrome, and by omission, the proposed site allocations had not been prepared in accordance with sound evidence. However, following an explanation by Officers that the area in question was indeed included in the HIA study area and that the proposed allocation had taken account of the evidence in requiring an appropriate heritage buffer, Historic England agreed that the two local plans had been soundly prepared in this regard.

Historic England maintains an 'in principle objection' to the southern portion of the proposed East of Welwyn Garden City allocation, within Welwyn Hatfield Borough. Their main concern is the potential impact on setting, views, vistas, approach and the valley setting of the Grade I Listed Hatfield House and Gardens. The HIA prepared by Beacon indicates that the southern extremity of the proposed site allocation at WGC5 (within Welwyn Hatfield Borough) would start to enclose the eastern views from Hatfield House with development, to the detriment of the Park. However, the HIA indicated that there is scope for development but it will need to be carefully considered and designed to integrate into the landscape. The HIA further mentions that the mitigation required will depend upon the extent and nature of development that comes forward, with the retention of open spaces and landscaping required. These could however, be determined through the masterplanning process.

It is the intention that Historic England is fully engaged in the masterplanning process, which will evolve into a Supplementary Planning Document to inform applications on the site moving forward. In order to inform the masterplanning, further work will be required which assesses the potential impact on the views from and of Hatfield House and Gardens, the valley setting and approach and the type and extent of mitigation required. The landowner will be required to submit this assessment to inform the collaborative masterplanning of the overall site.

- **Gilston Area**

As part of its response to the District Plan Preferred Options consultation, Historic England suggested that a comprehensive study should be undertaken in order to assess the potential impacts of development on heritage assets, both within the site area and beyond. In response, the site promoters commissioned a Heritage Desk Based Assessment and Historic Environment Management Plan. Historic England has some concerns about the work

undertaken but has agreed to provide feedback and recommended actions. The Council is committed to addressing any matters raised by Historic England, either through further technical work and/or through masterplanning.

- **Chapter 21 – Heritage Assets**

Historic England records that there are 16 rather than 15 Registered Parks and Gardens within East Herts. The Council agreed that this could be proposed as a minor change to the Plan in due course.

Historic England advises that their approach to Enabling Development has changed, and that this type of development should not be planned for within a Local Plan as it is by definition, contrary to policy. Therefore, they recommend that Policy HA9 (Enabling Development) should either be removed in full or should contain only reference to the Historic England guidance on the matter. It is agreed that only Part I of the policy, which refers to the Historic England guidance should be retained and this would be proposed as a minor change to the Plan in due course.

7. Commitment to Future Co-operation

7.1 Both authorities remain committed to effective co-operation on all matters relating to the Duty to Co-operate. As such, both East Herts Council and Historic England commit to review and update this agreement as appropriate, as key milestones are reached in the preparation of the District Plan, and any review, including if any amendments are proposed following the Pre-Submission District Plan consultation which may impact on heritage assets and the historic environment.

7.2 Historic England is a statutory stakeholder in Plan-making, but has a less frequent involvement in planning applications and the development of masterplans.

- **Masterplanning and Decision Making**

As strategic developments sites come forward as planning applications, it may be necessary for Historic England to engage in the masterplanning process of these larger, more complex sites, particularly where there may be impacts on the historic environment. East Herts Council therefore agrees that Historic England will be consulted at an early stage in the masterplanning process to enable Historic England officers to determine their level of further involvement. Matters of detail may be best managed by other local stakeholders such as the Historic Environment Unit at Hertfordshire County Council, for example.

- **Approach to Plan Reviews and the Review of Evidence**

East Herts Council is committed to the early review of the District Plan as required and will therefore engage with stakeholders such as Historic England at an early stage in the process. Where new or revised evidence is required, the Council and Historic England will engage pro-actively on the preparation of technical briefs, throughout the evidence gathering and reporting stages as

appropriate. This may involve attendance at meetings or through written representation.

8. Evidence of Co-operation

- 8.1 The Council and Historic England have co-operated throughout each stage of the Plan-making process. Historic England responded to the Core Strategy Issues and Options consultation in 2010. Their comments helped to shape the initial topic assessment stage of the District Plan.
- 8.2 Historic England responded with detailed comments at the Preferred Options stage. These comments were used to inform policies proposed in the Pre-Submission District Plan. At that time they requested that a Heritage Impact Assessment be carried out, which assessed the significance of Panshanger Park and the capacity of land in the vicinity of the park to accommodate development. This work was jointly commissioned with Welwyn Hatfield Borough Council and English Heritage Officers provided advice and feedback throughout each stage of the assessment.
- 8.3 Historic England was again consulted and responded to the Pre-Submission District Plan, making further detailed comments. In order to address these comments, Officers from East Herts Council and Welwyn Hatfield Borough Council attended a meeting with Historic England on 23rd January 2017. One of the outcomes of the meeting is the production of this Memorandum of Understanding and the matters agreed as set out in detail above.

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**Duty to Co-operate
Memorandum of Understanding
East Herts Council and Natural England**

- 1.1. This memorandum of understanding establishes a framework for co-operation between East Herts District Council and Natural England with respect to strategic planning and development issues.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Co-operation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.
- 1.4. This Memorandum of Understanding (MoU) has been prepared in the context of the publication version of the East Herts District Plan (2011-2033) which was placed on public deposit for a six week period ending 15th December 2016 (hereafter “the Plan”). The MoU was prepared in January 2017 in the period leading up to the planned submission of the plan to the Secretary of State for independent examination.

2. Parties to the Memorandum

2.1. The Memorandum is agreed by the following authorities:

- East Herts Council (hereafter “the Council”)
- Natural England

2.2. We the undersigned, set out in this memorandum those matters of joint strategic interest to both authorities as they are dealt with in the East Herts District Plan, in accordance with paragraph 181 of the National Planning Policy Framework, March 2012.

2.3. It is important to place on record that discussions between the two Authorities have embraced the full range of strategic cross-boundary matters covered by the Duty to Co-operate. Both Authorities are content that the Duty to Co-operate has been met thus far and ongoing liaison will ensure that this continuing liaison will be effectively addressed.

3. Limitations

3.1. The Parties recognise that there might not always be full agreement with respect to all the issues on which they have agreed to co-operate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the Parties in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

4.1. The Memorandum has the following broad objectives:

- To help secure a consistent approach to strategic planning and development issues.
- To identify and manage spatial planning and environmental issues that impact on natural environmental assets within East Herts District.
- To make sure that the local planning and development policies prepared by the local authority are, where appropriate, informed by the views of the Natural England and that there are agreed channels of communication between both parties in relation to proposed amendments to the Pre-Submission District Plan.
- To make sure that decisions on strategic planning applications are informed by the views of both parties by setting up an agreed approach to continued early engagement in the masterplanning of strategic sites.
- To identify and agree the need for and approach to undertaking further technical evidence to inform the submission of the District Plan and/or the examination of the District Plan.
- To make sure there is compliance with the Duty to Co-operate.

5. Matters Agreed

5.1. Engagement between the two authorities under the Duty to Co-operate has focussed on the location and quantum of development and the approach towards green infrastructure and environment policies within the East Herts District Plan. A summary of the discussions which have taken place between the authorities so far are listed in Section 8 below, while minutes of Duty to Co-operate meetings are included in Appendix 1. These have highlighted the following matters upon which both authorities agree or have an agreed approach to resolving:

- **District Plan**

Natural England has been engaged throughout the Plan-making process through various means such as through discussion on early stages of site assessment and shortlisting, through to drafting the District Plan policies. Natural England has also been involved in the production of the Habitat Regulations Assessment of the emerging District Plan, attending meetings and providing written responses as requested

- **Habitats Regulations Assessment**

Natural England made comments to the Pre-Submission District Plan consultation. They raise concern that the Habitat Regulations Assessment (HRA) contains a caveat that the conclusion of “no likely significant effects” is contingent upon the signature, adoption and implementation of the Epping Forest Special Area of Conservation (SAC) MoU between the Housing Market Area authorities. Natural England has been involved in the preparation of the Strategic Spatial Options Study. This study considers a range of development options around Harlow, which included a Habitat Regulations Assessment style appraisal of the options individually and cumulatively on the Epping Forest SAC and other European designated sites. Natural England are a signatory to the MoU for Managing the Impacts of Growth Within the West Essex/East Herts Housing Market Area on Epping Forest Special area of Conservation which has now been signed by all the authorities involved. Therefore it is considered that this addresses the concerns raised by Natural England in their representations.

- **Policy DPS4 Infrastructure Requirements**

Natural England raised concern that the policy and the supporting Infrastructure Delivery Plan did not make adequate provision for green infrastructure. Since the Pre-Submission consultation, more evidence is now available with regards to green infrastructure projects and associated costs and now forms an integral part of the Infrastructure Delivery Plan. The Council is working with Countryside Management Services and site promoters to better understand the requirements, opportunities and costs of meeting the District Plan requirements in terms of green infrastructure and the natural environment.

- **Policy BISH5 Bishop’s Stortford South**

Natural England has raised concern that the policy is unclear in terms of creating “connections to existing green infrastructure assets such as

Southern Country Park and the Thorley Flood Pound SSSI and Nature reserve". They are concerned that the additional recreational pressure on the nature reserve and SSSI would be to the detriment of the reserve. The Council agrees that the addition of explanatory words would be useful in order to make it clear that such connections are not to the detriment of the ecological interest of the SSSI. The Council will engage with Natural England further on the appropriate text to be put forward as a proposed minor change to the policy or supporting text.

The main intention of this element of the policy is to utilise existing green infrastructure assets around the proposed allocation to create green routes for pedestrians and cyclists to connect through the site, for example a cycle network running between Southern Country Park and surrounding residential areas through the site across London Road through to the River Stort up to the Station, as an alternative to road-based routes. The creation of open spaces and other green infrastructure features on site is anticipated to reduce recreational pressure on the SSSI from the development, but if increased desire for access occurs that these can be through an enhanced green infrastructure network of paths, waterways and open spaces.

- **Policy WARE2 Land North and East of Ware**

Natural England commends the commitment to green infrastructure. The Council welcomes this commendation and is keen to ensure Natural England and other partners are engaged throughout the masterplanning of this site.

- **Policy GA1 The Gilston Area**

Natural England has raised a concern about this site in relation to the Epping Forest Special Area of Conservation. This has since been addressed through the commitment set out in the MoU signed by the Housing Market Area authorities and Natural England.

Natural England recommend that the policy be expanded to contain safeguards for Hunsdon Mead SSSI and should seek enhancement where appropriate. Part III(g) already refers to quality local green infrastructure and the Council agrees that additional reference to Hunsdon Mead SSSI would be proposed as a minor change to the Planning Inspector in due course.

- **Soils and Best and Most Versatile Agricultural Land**

Natural England raise concern that the Plan is silent on matters of soil and best and most versatile agricultural land. The NPPF requires (paragraph 112) that local authorities take account of best and most versatile agricultural land, but does not require a policy on the issue. The quality of agricultural land has been considered alongside the many matters taken account of in the preparation of site allocations. Soil quality is only currently referenced in terms of contaminated land. The Council is happy to work with Natural England in the formulation of supporting text or a new policy to resolve their concerns if considered appropriate. This will then be proposed to the Inspector as a change to the Plan in due course.

- **Policy WAT6 Wastewater Infrastructure**
 Natural England raise concern that the use of Grampian conditions is not sufficient to ensure no likely significant effects are caused in terms of the Habitat Regulations Assessment. The capacity of Rye Meads Sewerage treatment Works is a key issue and therefore Natural England reserve their position until such time that Thames Water confirm there is sufficient capacity to accommodate development in the catchment. Development may need to be phased appropriately. The Council is working with Thames Water and will be signing a Memorandum of Understanding to this effect.
- **Policy EQ4 Air Quality**
 Natural England suggest that this policy may need amendment depending upon the outcome of the MoU to address air quality concerns in the Epping Forest SAC. The Council will work with Natural England in the formulation of additional words either in the supporting text or the policy if required and will propose these as minor modifications to the Plan in due course.
- **Policy DEL2 Planning Obligations**
 Natural England supports the addition of nature conservation in the list of infrastructure requirements. The Council is proposing a number of changes to the Infrastructure Delivery Plan which place greater emphasis on green infrastructure and biodiversity.
- **Monitoring**
 Natural England suggests that the monitoring framework is currently not sufficient to be able to identify any helpful changes and should also seek to monitor positive changes as well as losses. The Council agrees that as the Plan seeks to create net gains to biodiversity, that the monitoring framework should be able to capture these gains. The Council would welcome further engagement with Natural England on devising appropriate measuring tools for inclusion in the monitoring framework.
- **Recreational pressure on the Lee Valley Special Protection Area and Ramsar site**
 Natural England suggest that the HRA does not address the potential impacts from the Plan on the Lea Valley Regional Park. The HRA for the Regional Park (dated 2007) does not take account of the latest proposed growth in the East Herts District Plan and therefore the Regional Park Authority should be consulted to ensure that any potential increase on recreational pressure is considered manageable or if mitigation will be required. The Regional Park Authority were consulted and responded to the consultation. They were supportive of the Plan, particularly where amendments had been made in response to their comments on the Preferred Options District Plan consultation, which they now consider address their previous concerns.
- **Air quality in the Lea Valley Special Protection Area and Ramsar**
 Natural England raise concern that there are a number of errors in the HRA and that there is a discrepancy in its conclusions between Option C and Option E. These options are the spatial distribution options for the West

Essex and East Hertfordshire Housing Market Area. Option C comprises less development at Harlow and two new settlements in East Herts, while Option E comprises the highest level of growth across the housing market area, with considerable focus around Harlow. Therefore in terms of the East Herts HRA, focusing a greater amount of growth in two locations less well connected (Option C) would create more vehicle movements across the district, largely loading on to the A414. Whereas, given the potential to connect to public transport networks and the variety of options in terms of travel direction and access to the strategic road network, growth around Harlow would not necessarily generate the same number of vehicle movements on the A414. However, in terms of recreational pressure and other considerations, the option which maximises the amount of growth around Harlow would have the greatest level of impact in HRA terms as the growth would be closer to the Epping Forest SAC and the Lea Valley SPA and Ramsar sites.

6. Outstanding Matters

6.1 Policy NE1 International, National and Locally Designated Nature Conservation Sites

Natural England raise concern that there is insufficient distinction between the hierarchy of sites, and that international sites should enjoy the highest level of protection. The Council is keen to ensure that all designated sites benefit from protection given the vital importance they play in contributing to the wider ecological network. Regardless of this, Policy NE1 distinguishes between sites of different status, setting out different approaches to development proposals and mitigation measures commensurate to the site's status. To separate each of the three types of designated sites would result in very similar and repetitive policies. This would cause confusion given that a large number of the District's designated sites are co-located – a large Local Wildlife Site may contain distinct parcels which are also designated as a SSSI, an SPA or and SAC. Wormley-Hoddesdonpark Woods is one example of this situation.

In this regard, the Council does not agree that a change to the policy approach would add value to the Plan and is not proposing to make and suggested changes to this effect.

Natural England also raise concern that the Plan does not adequately address geological conservation interests. There is only one site within East Herts that has geological interest and that site is already designated as a SSSI. Therefore it is considered that this is appropriately covered within Policy NE1.

7. Commitment to Future Co-operation

- 7.1 Both authorities remain committed to effective co-operation on all matters relating to the Duty to Co-operate. As such, both East Herts Council and Natural England commit to review and update this agreement as appropriate, as key milestones are reached in the preparation of the District Plan, and any review, including if any amendments are proposed following the Pre-Submission District Plan consultation which may impact on designated sites of nature conservation interest.
- 7.2 Natural England are a statutory stakeholder in Plan-making, but have a less frequent involvement in planning applications and the development of masterplans.

- **Masterplanning and Decision Making**

As strategic developments sites come forward as planning applications, it may be necessary for Natural England to engage in the masterplanning process of these larger, more complex sites, particularly where there may be impacts on the natural environment. The two authorities therefore agree that Natural England will be consulted at an early stage in the masterplanning process to enable Natural England officers to determine their level of further involvement. Matters of detail may be best managed by other local stakeholders such as Herts and Middlesex Wildlife Trust and Herts Ecology, for example.

- **Approach to Plan Reviews and the Review of Evidence**

East Herts Council is committed to the early review of the District Plan as required and will therefore engage with stakeholders such as Natural England at an early stage in the process. Where new or revised evidence is required, the two authorities will engage pro-actively on the preparation of technical briefs, throughout the evidence gathering and reporting stages as appropriate. This may involve attendance at meetings or through written representation.

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Duty to Co-operate
Memorandum of Understanding
East Herts Council and the Local Nature Partnership

- 1.1. This memorandum of understanding establishes a framework for co-operation between East Herts District Council and the Local Nature Partnership with respect to strategic planning and development issues.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should cooperate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Co-operation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

2. Parties to the Memorandum

- 2.1. The Memorandum is agreed by the following parties / authorities:
 - East Hertfordshire District Council
 - The Hertfordshire Local Nature Partnership

3. Limitations

- 3.1. The Parties recognise that there might not always be full agreement with respect to all the issues on which they have agreed to co-operate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the

Parties in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

4.1. The Memorandum has the following broad objectives:

- To help secure a consistent approach to strategic planning and development issues.
- To make sure that the District Plan complies with the guiding principles of the Local Nature Partnership.
- To identify and agree the need for and approach to undertaking further technical evidence to inform the submission of the District Plan and/or the examination of the District Plan.
- To make sure there is compliance with the Duty to Co-operate.

5. Matters Agreed

5.1. East Herts council has prepared a Statement of Accordance with the LNP Principles and this has been agreed by the LNP Board as a fair and accurate statement. The Statement is attached as **Appendix A**.

6. Matters of Joint concern or where further co-operation will be required

6.1. The following LNP partnership bodies have made representations to the East Herts District Plan:

- **Herts and Middlesex Wildlife Trust** – Generally supports the District Plan and makes recommendations for amendments to policies to reflect changes in best practice and to enable flexibility should biodiversity calculation methods change over time, and to specify the purpose of these calculations is to demonstrate a net gain.
- **Lea Valley Regional Park Authority** – The Authority supports the District Plan policies of relevance to the Regional Park.
- **Herts and Middlesex Badger Group** – have raised concerns about the impact on badgers in the vicinity of the East of Stevenage proposed allocation.
- **Natural England** – have raised concern that the Lea Valley Regional Park Authority evidence will not have anticipated the proposed developments and that the authority should be consulted to ensure the Plan takes account of the impacts on the Regional Park. They also raise concern that the recreational pressures on the Epping Forest SAC arising from development across the Housing Market Area have not been considered. Other site specific issues were raised and suggestions put forward to add clarity to policy requirements.
- **Environment Agency** – generally supportive of the District Plan. Some site-specific matters were raised regarding the requirement to ensure flood risk assessments are carried out and that developers should apply the sequential approach to the layout of sites to avoid and mitigate flood risk.

7. Commitment to Future Co-operation

- 7.1. East Herts Council intends to suggest a number of minor amendments to the Plan as a result of these comments and will be collaborating with the relevant LNP partnership bodies to agree these suggestions. In particular, the issue of recreational pressure on the Epping Forest SAC have since been resolved in collaboration with Natural England. An MoU has been signed between East Herts, Harlow and Epping Forest Councils and the City of London Conservators and Natural England to this effect. This MoU is attached at **Appendix B**.
- 7.2. Site-specific matters will be resolved through a collaborative approach to masterplanning which will enable early and continued engagement on the planning and delivery of development.
- 7.3. It is also the intention of the Council to prepare Memoranda of Understanding with the Environment Agency, Natural England and the Lea Valley Regional Park Authority.

8. Evidence of Co-operation

- 8.1. Throughout the Plan-making process officers have liaised with various Local Nature Partnership bodies such as Hertfordshire Ecology, the Herts and Middlesex Wildlife Trust and the Lea Valley regional Park Authority in the formulation of the District Plan policies.
- 8.2. Officers also attend the Lea Valley Nature Improvement Area Partnership.

Appendix A

East Herts District Plan

Statement in Accordance with Local Nature Partnership Principles

February 2017

This Statement is to set out how the emerging East Herts District Plan has been prepared in accordance with the six guiding principles as established by the Hertfordshire Local Nature Partnership *Planning for Biodiversity and the Natural Environment in Hertfordshire – Guiding Principles*, 2014.

Principle 1: Recognise the value of the natural environment and the range of benefits and services it provides

The emerging East Herts District Plan (hereafter “the Plan”) recognises the many ecosystem services and benefits that the natural environment and green and blue infrastructure provide.

Chapter 20 of the Plan focuses on the natural environment, recognising that the natural environment is an integral part of the planning system and as such needs to be taken into consideration in any development. East Herts has a rich geological and biological inheritance and it is important that this is protected and enhanced for current and future generations.

Additions to the Plan subsequent to the Preferred Options District Plan consultation include greater reference to improving the health and wellbeing of residents and visitors to the District, and recognises that open spaces perform wider health and wellbeing benefits beyond opportunities for sport or recreation, such as for reflection and relaxation, for improving air quality and creating urban heat cooling for example.

These matters are also addressed through the Sustainability Appraisal of the District Plan.

Principle 2: Protect and enhance existing biodiversity assets

Chapter 20: Natural Environment contains four policies which seek to protect and enhance existing biodiversity assets. These policies seek to protect and enhance areas designated for their biodiversity importance commensurate to their level of significance.

Policy NE1: International, National and Locally Designated Nature Conservation Sites states, that permission will be refused for development proposals, land use or activities which are likely to have a detrimental impact which adversely affects the integrity of a site, unless there are imperative reasons of overriding public interest, as per the provisions of the National Planning Policy Framework (NPPF). In these exceptional situations, evidence of a sequential assessment will be required and appropriate mitigation sought which achieves a net gain for nature. Proposals are

required to avoid impacts, provide mitigation where impact is unavoidable and provide compensatory measures to achieve a net gain for nature, either on or off-site. Ecological impacts will be quantified by using an approved Biodiversity Impact Assessment Calculator.

Policy NE2: Sites of Nature Conservation Interest (Non-Designated), requires all development proposals to achieve a net gain in biodiversity, applying the mitigation hierarchy of avoidance, mitigation and compensation, within the context of avoiding harm to, or loss of features that contribute to the wider ecological network.

Policy NE3: Species and Habitats, requires development proposals to seek to enhance biodiversity and to create opportunities for wildlife. European Protected Species will be protected and the three derogation tests will be required in accordance with the European Habitats and Birds Directive.

Development proposals for strategic sites are required to follow a comprehensive masterplanning approach, which engages relevant experts and stakeholders as necessary. There will therefore be sufficient measures to ensure that masterplans are prepared with a full understanding of the ecological assets and constraints of a site and its surrounding environment.

Principle 3: Seek opportunities to improve habitat connectivity

The Natural Environment chapter seeks to increase habitat connectivity through the requirement for development to create a net gain to biodiversity. The chapter references and requires development to be in accordance with the Local Nature Partnership and the Hertfordshire Biodiversity Action Plan. Development is required to avoid habitat loss and fragmentation and to create, restore and enhanced linked habitats and 'stepping stones' through the landscape.

The chapter provides guidance as to the variety of possible interventions and mitigation measures and makes it clear that compensation is a last resort and will not make unacceptable development acceptable where a habitat is lost. Biodiversity offsetting approaches will not be applied to priority habitats.

The river environment is a key part of the character of each of the District's towns and many villages, and it is therefore particularly important that rivers and their landscapes are protected and improved and that opportunities are taken to maximise the benefit of river corridors in terms of increasing connectivity between different ecological assets and as a means of improving recreational access, thereby increasing a sense of appreciation and ownership of the natural environment.

In addition to the Natural Environment chapter, the Design and Landscape chapter and site specific policies seek to improve the coverage and connectivity of different habitats, including within the urban environment through street trees, buffer planting, amenity spaces, parks and residential gardens.

The Council is working with the Lea Catchment Nature Improvement Area Partnership on several schemes across the district and regularly engage relevant experts as required during the plan-making and planning application stages.

Principle 4: Integrate biodiversity opportunities within new development

The District Plan Design and Landscape chapters requires proposals to fully consider the landscape character of sites and must demonstrate how proposals conserve, enhance or strengthen the character and distinctive features of the landscape and to retain, protect and enhance existing landscape features which are of amenity and/or biodiversity value.

The Community Facilities chapter and site-specific policies require development proposals to integrate existing biodiversity features within the overall design, and to maximise the use of green infrastructure features to provide multiple-use solutions to matters such as drainage, the need for open spaces and as a means of providing non-vehicle based routes through sites. On-site mitigation measures are encouraged such as the use of bat and bird boxes, urban landscaping and reduced lighting for example.

Principle 5: Make decisions informed by the best available ecological information and data

The District Plan advises that applicants engage the advice of relevant stakeholders such as the Herts Environmental Records Centre at an early stage in the application process. The District Plan provides signposts to relevant organisations and tools to assist in this process.

Applicants are required to demonstrate that the ecological value of a site has been appropriately assessed and that proposals will mitigate any impacts or losses arising through development. All proposals are required to provide net gains to biodiversity in line with the requirements of the NPPF and therefore the Plan requires the use of an approved Biodiversity Impact Assessment Calculator.

Principle 6: Secure the long term management of existing and new habitats/sites

One important aspect to the provision of green infrastructure and other mitigation measures is the long-term maintenance of such features after the development is complete. Therefore the Plan seeks to ensure that management programmes are provided and agreed through the planning application process to demonstrate how the maintenance requirements have been considered.

The District Plan makes it clear that conditions and the use of Section 106 Agreements will be used to ensure that mitigation measures are provided satisfactorily. For the largest proposed strategic allocation at the Gilston Area site, it is envisaged that a community land trust is established to assist in the long term planning and maintenance of open space assets provided through the development.

The Infrastructure Delivery Plan supporting the East Herts District Plan identifies a range of green infrastructure projects likely to be required to support the development proposed in the Plan, and sets out how these projects can be funded and delivered in association with the Local Nature Partnership and its member bodies.

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Duty to Co-operate
Memorandum of Understanding
East Herts Council and the Lea Valley Regional Park Authority

- 1.1. This memorandum of understanding establishes a framework for co-operation between East Herts Council and the Lea Valley Regional Park Authority with respect to strategic planning and development issues, with particular focus on green infrastructure and the Lea Valley Regional Park within and adjacent to East Herts.
- 1.2. Local Authorities are required through the Duty to Co-operate to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. The NPPF sets out the requirement that public bodies should co-operate on planning issues that cross administrative boundaries particularly those which relate to the following strategic priorities:
 - The homes and jobs needed in the area.
 - The provision of retail, leisure, and other commercial development.
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management.
 - The provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment including landscape.
- 1.3. The NPPF requires Local Planning Authorities to work collaboratively with other bodies to make sure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Local Planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross- boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Co-operation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.
- 1.4. This Memorandum of Understanding (MoU) has been prepared in the context of the publication version of the East Herts District Plan (2011-2033) which was placed on public deposit for a six week period ending 15th December 2016 (hereafter “the Plan”). The MoU was prepared in January 2017 in the period leading up to the planned submission of the plan to the Secretary of State for independent examination.

2. Parties to the Memorandum

- 2.1. The Memorandum is agreed by the following authorities:
 - East Hertfordshire District Council (EHC)
 - The Lea Valley Regional Park Authority (LVRPA)
- 2.2. We, the undersigned, set out in this memorandum those matters of joint strategic interest to both authorities as they are dealt with in the East Herts District Plan, in accordance with paragraph 181 of the National Planning Policy Framework, March 2012.
- 2.3. It is important to place on record that discussions between the two Authorities have embraced the full range of strategic cross-boundary matters covered by the Duty to Co-operate. Both Authorities are content that the Duty to Co-operate has been met thus far and ongoing liaison will ensure that this continuing liaison will be effectively addressed.

3. Limitations

- 3.1. The Parties recognise that there might not always be full agreement with respect to all the issues on which they have agreed to co-operate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the Parties in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

- 4.1. The Memorandum has the following broad objectives:
 - To help secure a consistent approach to strategic planning and development issues.
 - To identify and manage spatial planning and development issues that impact on green infrastructure assets within East Herts District, in particular, on the Lea Valley Regional Park.
 - To make sure that the local planning and development policies prepared by the local authority are, where appropriate, informed by the views of the Regional Park Authority and that there are agreed channels of communication between both parties in relation to proposed amendments to the Pre-Submission District Plan.
 - To make sure that decisions on strategic planning applications are informed by the views of both authorities by setting up an agreed approach to continued early engagement in the masterplanning of strategic sites.
 - To identify and agree the need for and approach to undertaking further technical evidence to inform the submission of the District Plan and/or the examination of the District Plan.
 - To make sure there is compliance with the Duty to Co-operate.

5. Matters Agreed

- 5.1. Engagement between the two Authorities under the Duty to Co-operate has focussed on the location and quantum of development and the approach

towards green infrastructure and environment policies within the East Herts District Plan. A summary of the discussions which have taken place between the authorities so far are listed in Section 8 below, while minutes of Duty to Co-operate meetings are included in Appendix 1. These have highlighted the following matters upon which both authorities agree or have an agreed approach to resolving:

- **Vision and Strategic Objectives**

The LVRPA welcomes the addition of reference to green infrastructure within the vision and strategic objectives, which were made following their representations to the Preferred Options District Plan consultation.

- **Chapter 9: Ware**

The LVRPA has some concern about the scale of development and its associated infrastructure in the proposed allocation to the north and east of Ware in terms of its potential to impact on the Regional Park. However the LVRPA are satisfied that the strengthening of other policies in the District Plan on green infrastructure and design and landscape, will afford the Regional Park with sufficient protection from any potential impacts associated with development as well as potentially provide enhancements.

- **Chapter 15: Economic Development**

The LVRPA supports Policy ED5 which seeks to ensure that tourism related developments protect water quality and the water environment.

- **Chapter 17: Design and Landscape**

The LVRPA supports policies relating to design and landscape, and the role they will play in protecting the existing high quality landscape within and surrounding the Park.

- **Chapter 18: Transport**

While generally supportive of Policy TRA1 (Sustainable Transport), the LVRPA have highlighted the need to ensure that where improvements to public transport networks are made that they take account of services that provide access to the Regional Park at key 'gateways'.

- **Chapter 19: Community Facilities**

The LVRPA welcomes the inclusion of reference to the Regional Park within this section of the Plan as an important green infrastructure asset. Policy CFLR5 is endorsed as it provides support for the emerging Park Development Framework proposals and leisure-related developments.

- **Chapter 20 Natural Environment**

The LVRPA is pleased to see amendments made to the District Plan following their representations to the Preferred Options District Plan consultation. The LVRPA particularly supports Policy NE1 (International, National and Locally Significant Conservation Sites), NE2 (Sites of Nature Conservation Interest (Non-Designated)), NE3 (Species and Habitats) and NE4 (Green Infrastructure). Following the Preferred Options District Plan consultation and discussions with the LVRPA, reference to the control of

lighting was added in order to assist the LVRPA ambition to create dark corridors along the edge of the Park.

- **Chapter 23 Water**

The LVRPA supports Policy WAT3, which seeks to preserve and enhance the water environment and the ecological value of watercourses and their margins. The LVRPA welcome amendments made to Policy WAT6 through the addition of bullet point II (b) following their representations made to the Preferred Options District Plan; that where upgrades and expansions to Rye Meads Waste Water Treatment Works are required, that they do not have adverse impacts on the designated sites of conservation interest.

6. Commitment to Future Co-operation

- 6.1 Both Authorities remain committed to effective co-operation on all matters relating to the Duty to Co-operate. As such, both East Herts Council and the Lea Valley Regional Park Authority commit to review and update this agreement as appropriate, as key milestones are reached in the preparation of the District Plan, and any review, including if any amendments are proposed following the Pre-Submission District Plan consultation which may impact on the Regional Park.

Duty to Co-operate
Memorandum of Understanding
East Herts Council and Thames Water

- 1.1. This memorandum of understanding establishes a framework for co-operation between East Herts District Council and Thames Water with respect to strategic planning and development issues.
- 1.2. This Memorandum of Understanding (MoU) has been prepared in the context of the publication version of the East Herts District Plan (2011-2033) which was placed on public deposit for a six week period ending 15th December 2016 (hereafter “the Plan”). The MoU was prepared in February 2017 in the period leading up to the planned submission of the plan to the Secretary of State for independent examination.

2. Parties to the Memorandum

- 2.1. The Memorandum is agreed by the following authorities:

- East Herts Council
- Thames Water

- 2.2. We the undersigned, set out in this memorandum those matters of joint strategic interest to both organisations as they are dealt with in the East Herts District Plan, in accordance with paragraph 181 of the National Planning Policy Framework, March 2012.

3. Limitations

- 3.1. The Parties recognise that there might not always be full agreement with respect to all the issues on which they have agreed to co-operate. For the avoidance of doubt the Memorandum will not restrict the discretion of any of the Parties in the determination of any planning application, or in the exercise of any its statutory powers and duties or in its response to consultations and is not intended to be legally binding.

4. Objectives

- 4.1. The Memorandum has the following broad objectives:

- To help secure a consistent approach to strategic planning and development issues.
- To identify and manage spatial planning and environmental issues that impact on wastewater infrastructure within East Herts District.
- To make sure that the local planning and development policies prepared by the local authority are, where appropriate, informed by the views of the Thames Water and that there are agreed channels of communication

between both parties in relation to proposed amendments to the Pre-Submission District Plan.

5. Matters Agreed

- 5.1. While not formally covered by the Duty to Co-operate, as identified within the National Planning Policy Framework, discussions between East Herts and Thames Water with regards to waste water issues are considered to form an important part of the Plan making process. The matters that have been agreed are set out below.

Site Specific Comments

- 5.2 While not objecting to the sites contained in the District Plan, Thames Water has indicated that, for the following sites, the wastewater network capacity may not be sufficient to cope with the proposed level of development:

- Bishop's Stortford North (BISH3)
- Bishop's Stortford South (BISH5)
- Buntingford First School Site (BUNT2)
- Land West of Hertford (HERT3)
- Land North of Hertford (HERT4)
- Land South of West Rd, Sawbridgeworth (SAWB2)
- Land North of West Rd, Sawbridgeworth (SAWB3)
- Land North of Sawbridgeworth (SAWB4)
- Land North and East of Ware (WARE2)
- The Gilston Area (GA1)
- Land East of Stevenage (EOS1)
- Land East of Welwyn Garden City (EWEL1)

- 5.3 The comments provided are Thames Waters latest understanding of the position in relation to wastewater network infrastructure for these sites and are not an objection to the inclusion of the sites. The identification of areas of concern within the network is subject to change over time as more information becomes available regarding development, not only within East Herts, but also adjoining authorities.

- 5.4 It is agreed that East Herts and Thames Water will work together, with the relevant developers as necessary, in order to ensure that network infrastructure upgrades required to support development are identified and delivered ahead of the occupation of development. In order to inform this process, it is agreed that detailed drainage strategies will be required as part of masterplanning work or the planning application process.

- 5.5 Notwithstanding the above, it is noted that BISH3 now has planning permission. In addition, detailed drainage work has been undertaken for HERT3 in consultation with Thames Water.

Rye Meads Wastewater Treatment Works

- 5.6 With regards to sewage treatment, Rye Meads serves a large part of the District. Taking into account proposed growth within the catchment, including areas outside of East Herts, Thames Water has advised that Rye Meads currently has capacity up to 2024.
- 5.7 This presents a worst case scenario and is a high level assessment based on Thames Water's latest understanding of housing requirements. This is subject to change over time as more information becomes available regarding development within the Rye Meads catchment and is dependent on factors such as approved local plans, timing of planning permissions, phasing and final timing of development. This is reflected in the Position Statement which forms Appendix A to this MoU.
- 5.8 If there is a need for additional capacity at Rye Meads, then Thames Water will aim to provide it in a timely fashion to facilitate development. Thames Water is currently producing its business plan for the period 2020-2025 which will identify and prioritise needs for future investment. Wherever there is growth expected Thames Water may seek to find additional capacity and prioritise investment where appropriate.
- 5.9 It is therefore agreed that East Herts and Thames Water will work together, with other local authorities and the Environment Agency as appropriate, in order to identify and deliver any required increase in capacity at Rye Meads WwTW.

6. Outstanding Matters

- 6.1 Thames Water has indicated that Policy WAT6 is unsound in that it should say that any upgrades required the wastewater network should be delivered ahead of development rather than in tandem as currently stated.
- 6.2 This issue has not been resolved. However, the Council will continue to liaise with Thames Water in order to reach a suitable resolution.

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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.

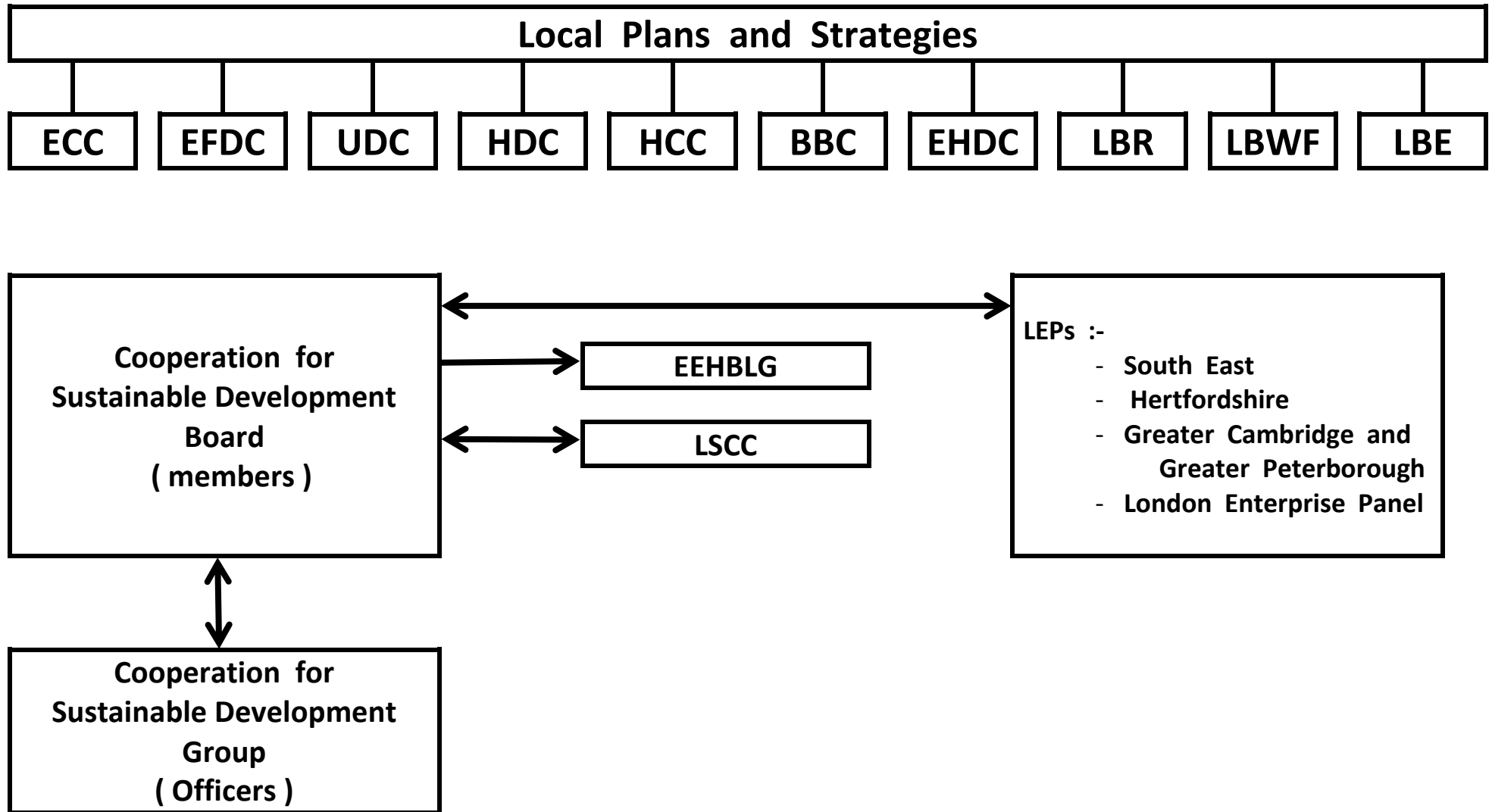
5 Technical Support

- 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

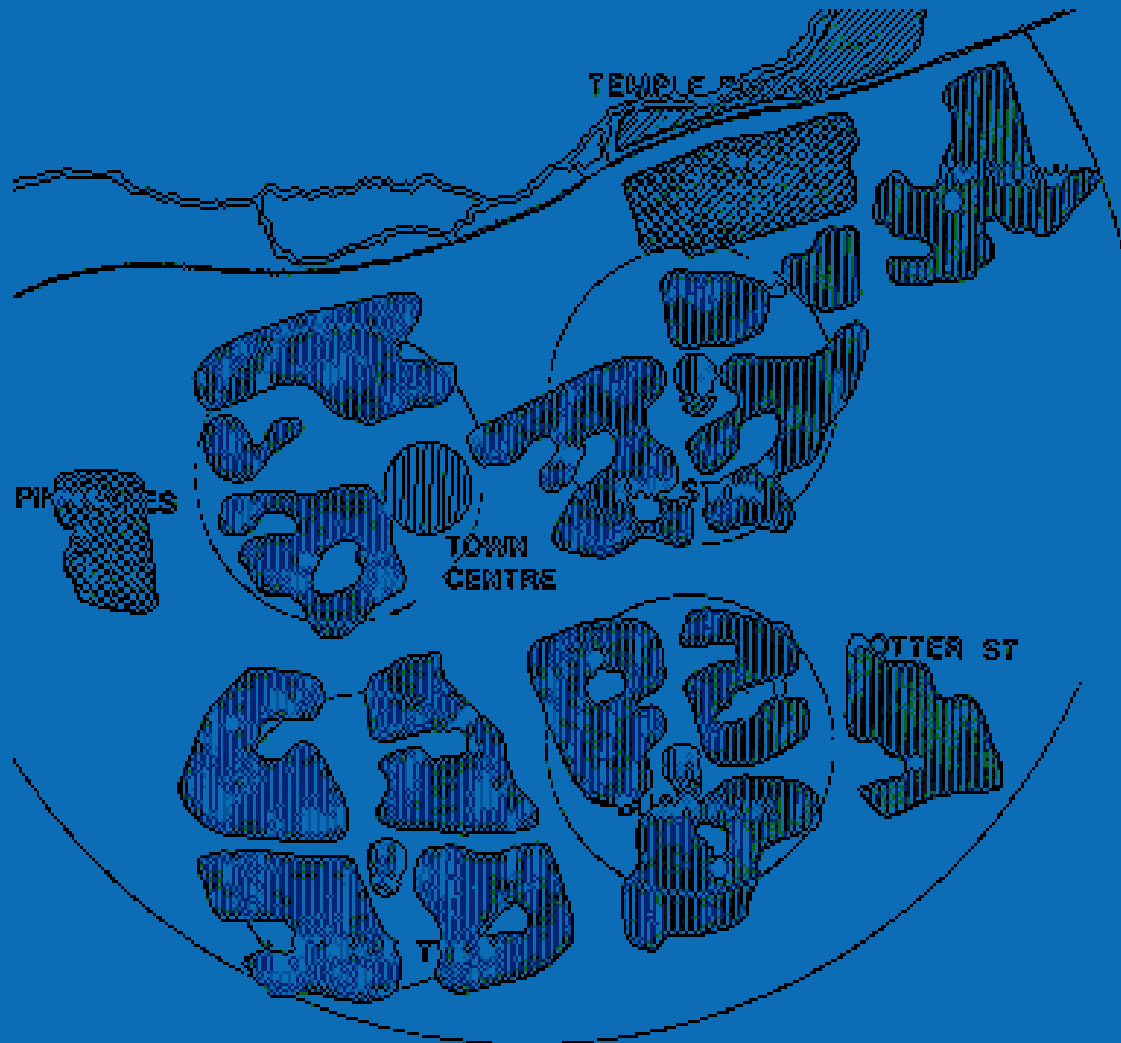


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Harlow & Gilston Garden Town

Expression of Interest

October 2016



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



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Disclaimer

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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.



Cllr Jon Clempner
Leader, Harlow DC



Cllr Chris Whitbread
Leader, Epping Forest DC



Cllr 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.

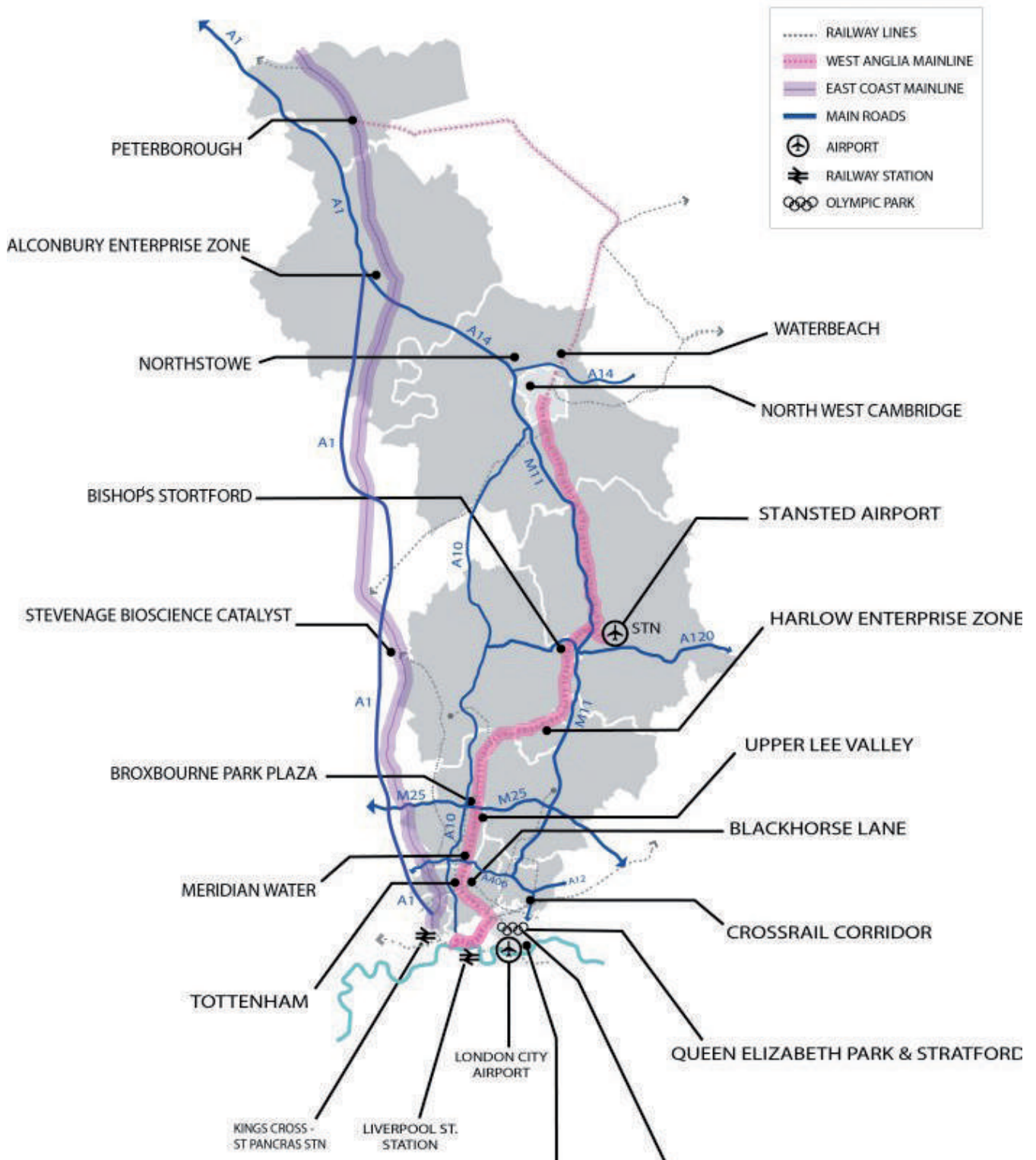


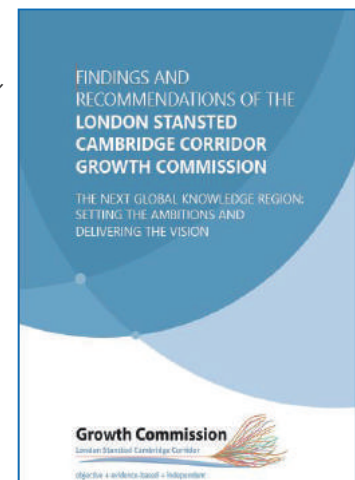
Figure 1: Opportunity sites within the LSCC



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

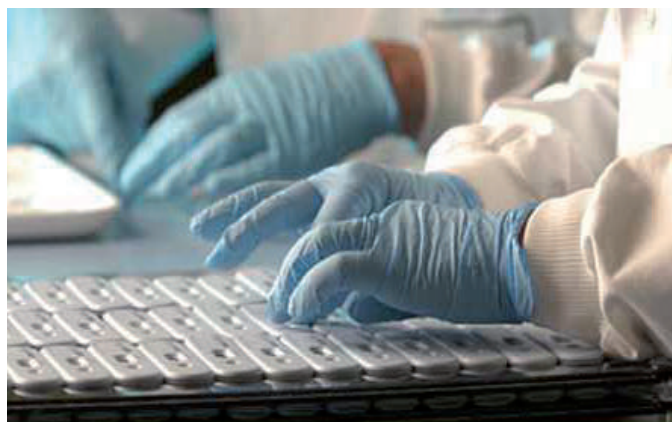
Various local studies have considered the opportunities to address the challenges facing Harlow today, and conclude with clear links between growth and regeneration outcomes.

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.

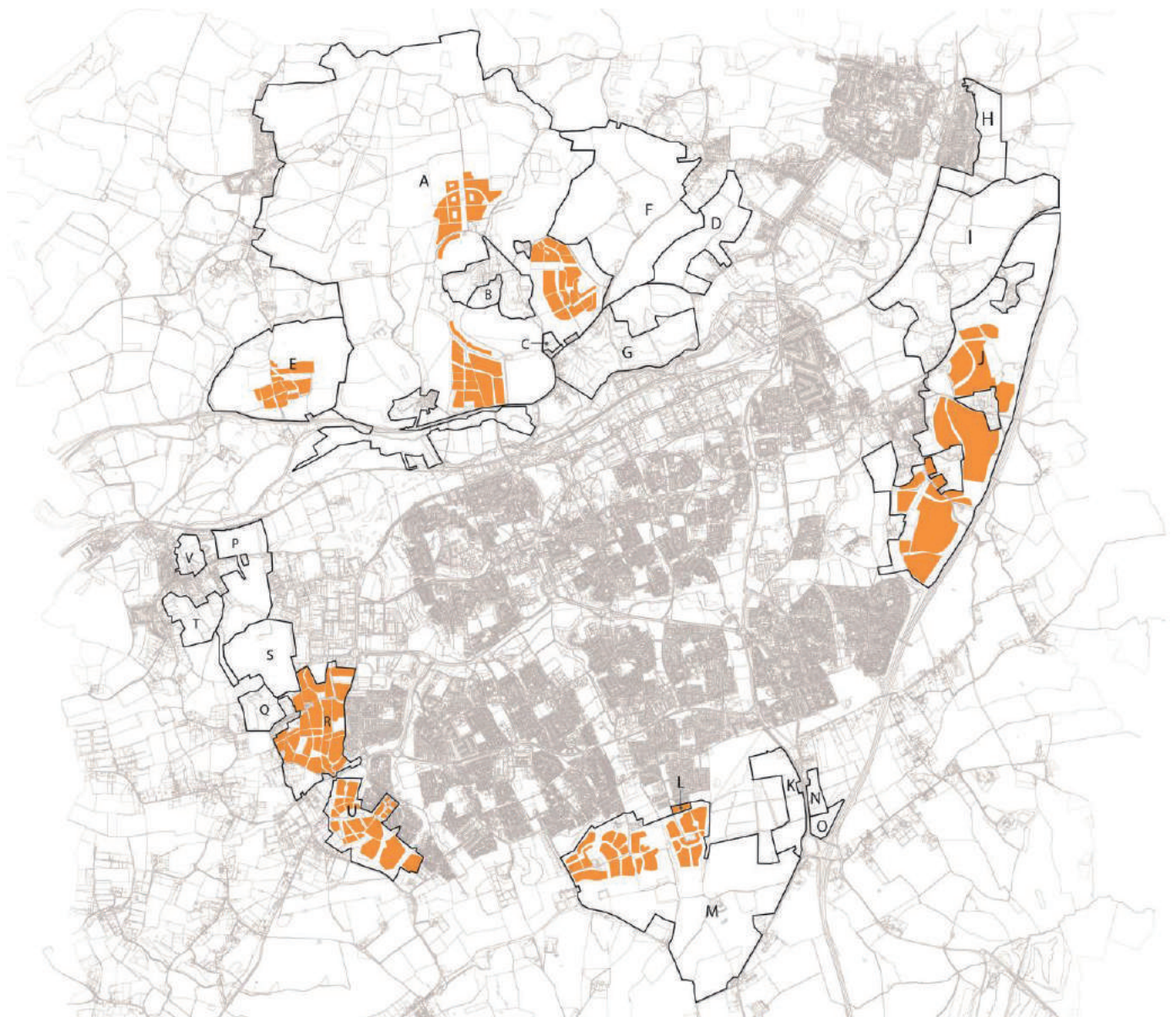


Figure 2: Indicative spatial option up to 2033

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

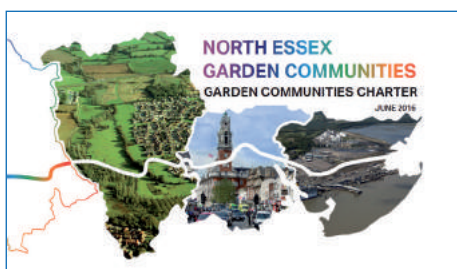
The Councils share a commitment to further develop the guiding principles through future collaborative working; the next level of spatial work will be enshrined in a joint Garden Town Charter which will define clear design principles to guide future development.

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

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.

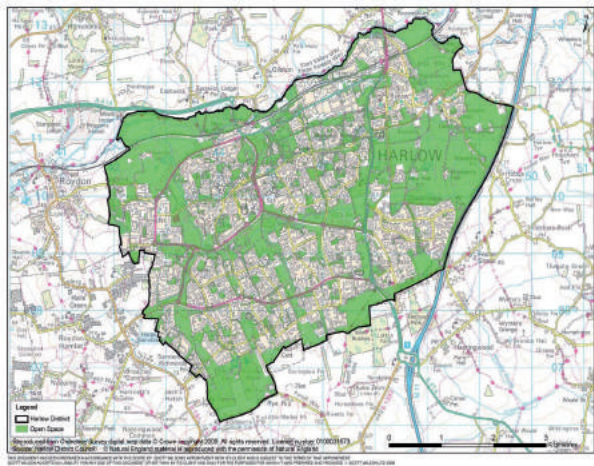
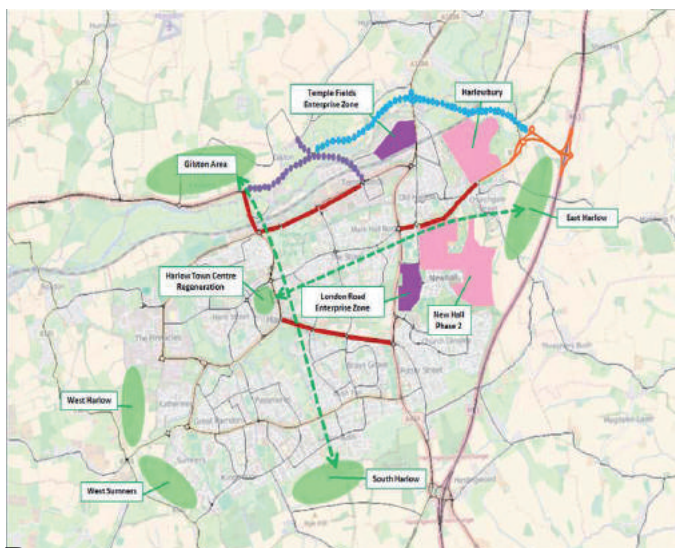


Figure 4: Harlow's existing network of Green Wedges and open spaces



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.



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

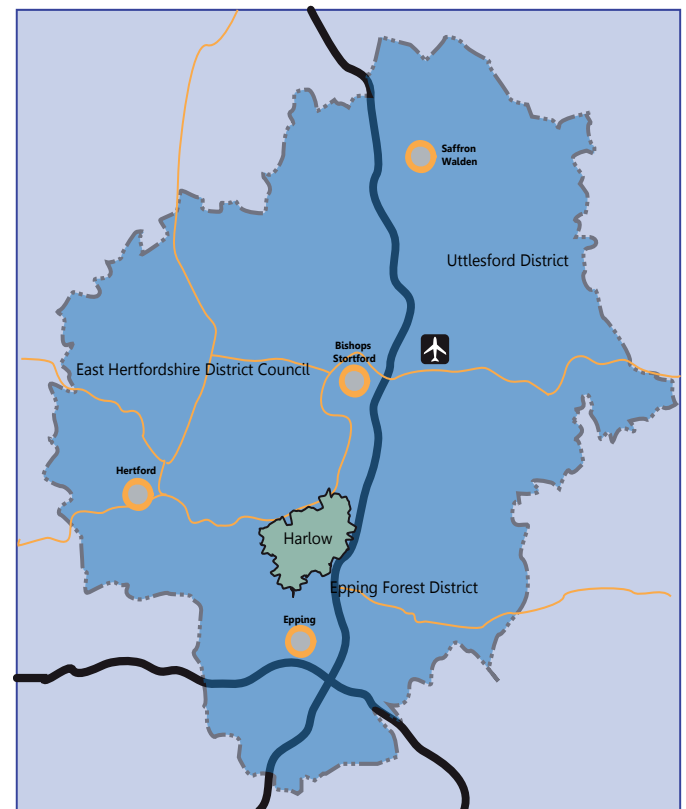


Figure 8: West Essex/East Hertfordshire Strategic Housing Market Area

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 9 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.

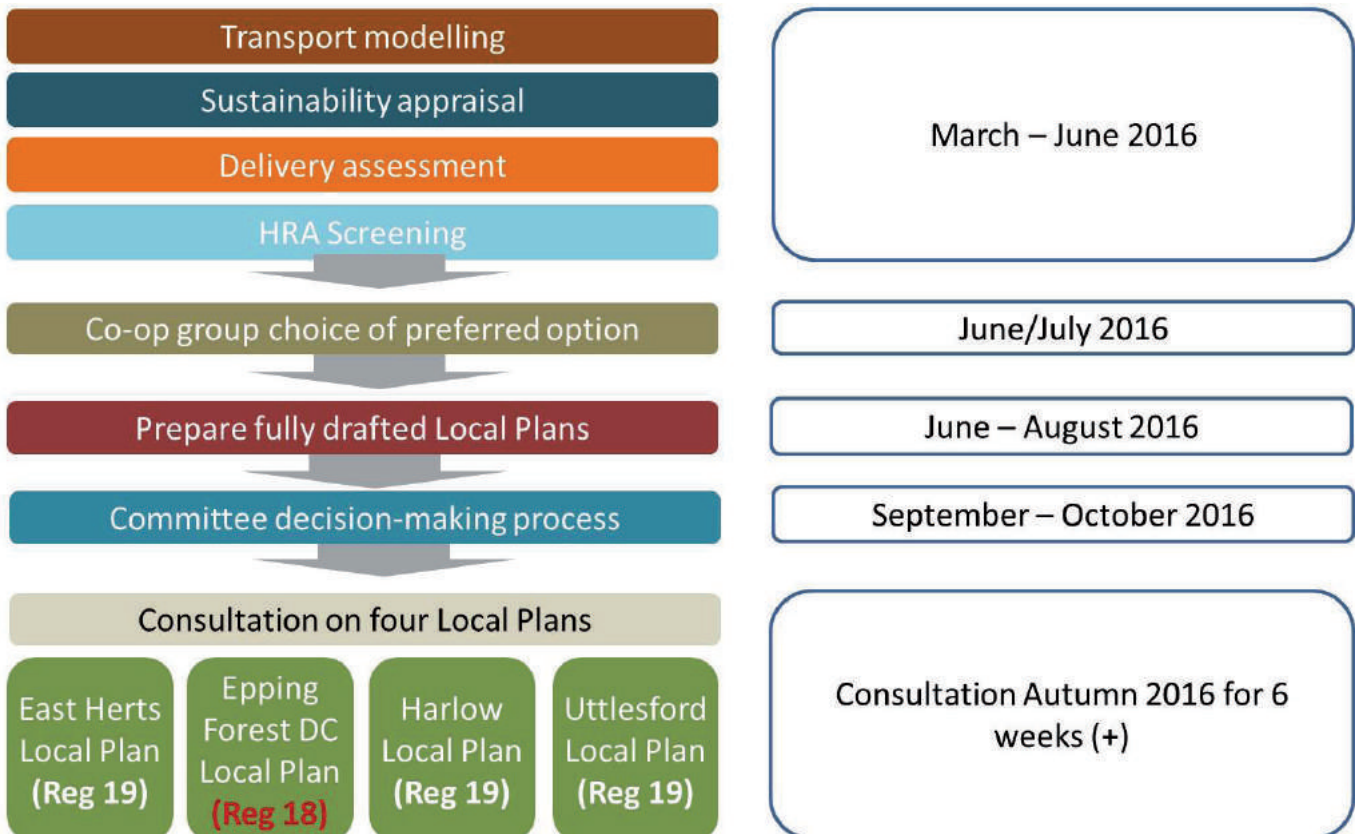


Figure 9: Local Plans Timescales

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.

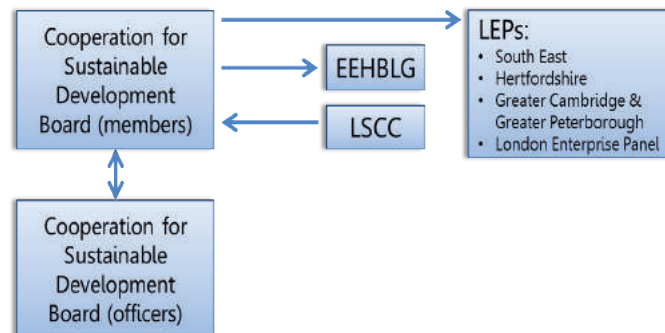
Figure 10: Co-operation for Sustainable Development



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



Robert Halfon, MP for Harlow:



Championing Apprenticeships
Campaigning for Lower Fuel Duty
Harlow Housing for Harlow People

HOUSE OF COMMONS
LONDON SW1A 0AA

Constituency Office:
01279 311 451

Westminster Office:
020 7219 7223

Gavin Barwell MP
DCLG
2 Marsham St
London SW1P 4DF

11th October 2016

Dear Gavin,

Expression of Interest under the Locally-Led Garden Towns Prospectus for 'Harlow & Gilston Garden Town'

As you may be aware, the Council Leaders and Portfolio Holders of Epping Forest District Council, East Hertfordshire District Council and Harlow District Council have recently submitted a joint Expression of Interest to the Department for Communities and Local Government, under the Locally-Led Garden Towns Prospectus, for 'Harlow and Gilston Garden Town'.

The level of growth detailed in the Expression of Interest is essential to meeting growing pressures for housing need locally and to delivering broader regeneration for Harlow. The Locally-Led Garden Towns Prospectus provides an excellent means to support the sustainable development of Harlow and its environs, using Garden City principles.

I have participated in discussions on this Expression of Interest with Council members, officers and with my colleague local MPs and am fully supportive of the ambition of the Council's as expressed in the Expression of Interest and all it seeks to achieve. The submission has the full support of Essex and Hertfordshire County Councils, Uttlesford District Council and the London Stansted Cambridge Consortium.

The three District Councils, along with Uttlesford District Council (who fully support the bid although they do not directly border Harlow and so did not feel it was appropriate to be party to it), have been working together for several years to bring about transformational growth within the Housing Market Area, centred on Harlow which functions as a regional service hub. All four authorities engage regularly as a Housing Market Area group, and also through the wider Co-operation for Sustainable Development Member Board and related Officer Group. All four authorities have worked together to align their Local Plan timetables, and all will be consulting on their Plans this Autumn/Winter.

I hope that you will be able to give the Expression of Interest your earliest support.

Yours sincerely,

Robert Halfon MP – Working Hard for Harlow

CAMPAIGNER OF THE YEAR, Spectator Magazine Awards POLITICIAN OF THE YEAR, Avanta Awards
TRANSPORT CAMPAIGNER OF THE YEAR, Dods Parliamentary Awards

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MRS. ELEANOR LAING MP



HOUSE OF COMMONS

LONDON SW1A 0AA

Gavin Barwell MP,
Minister of State for Housing & Planning and Minister for London,
Department of Communities and Local Government,
2 Marsham Street,
London SW1P 4DF

17th October, 2016

Dear Gavin,

**EXPRESSION OF INTEREST UNDER THE LOCALLY-LED GARDEN TOWNS PROSPECTUS
FOR 'HARLOW & GILSTON GARDEN TOWN'**

Council Leaders and Portfolio Holders from Epping Forest District Council, East Hertfordshire District Council and Harlow District Council have recently submitted a joint Expression of Interest to the Department for Communities and Local Government, under the Locally-Led Garden Towns Prospectus, for 'Harlow and Gilston Garden Town'.

The significant level of growth detailed in the Expression of Interest is key to meeting growing pressures of housing need locally, and to delivering broader regeneration and change for Harlow town. The Locally-Led Garden Towns Prospectus provides an excellent means to support the sustainable development of Harlow and its environs, using Garden City principles.

I have participated in discussions on this Expression of Interest with Council Members and other local MPs, and I am fully supportive of it, and all it seeks to achieve. It has also already attracted the written support of Essex and Hertfordshire County Councils, Uttlesford District Council and the London Stansted Cambridge Consortium.

The Three District Councils, along with Uttlesford District Council (who fully support the bid although they do not directly border Harlow town and so did not feel it was appropriate to be party to it), have been working together for several years to bring about transformational growth within the Housing Market Area, centred on Harlow which functions as a regional service hub. All four authorities engage regularly as a Housing Market Area group, and also through the wider Co-operation for Sustainable Development Member Board and related Officer Group, which were set up by Epping Forest District Council specifically to help meet the Duty to Co-operate. All four authorities have worked together to align their Local Plan timetables, and all will be consulting on their Plans this Autumn/Winter.

I hope that you will give the Expression of Interest your earliest support.

Yours sincerely,
Eleanor



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 Government's Locally Led Garden Town initiative.

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 Cities, 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.

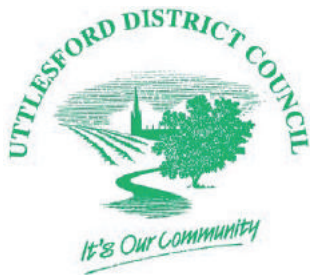
The fact that Harlow has attracted the support in principle of both East Herts and Epping Forest District Councils makes such expansion a real possibility. Harlow has been constrained by its own borders and outward growth, particularly that crossing the River Stort, can facilitate new sustainable housing- 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

A handwritten signature in blue ink, appearing to read "John Spence".

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

Garden Towns Team
Homes and Communities Agency
2 Marsham Street
London
SW1 4DF

9th October 2016

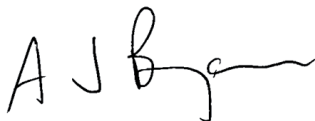
Dear Sir/Madam

Harlow and Gilston Garden Town

I am writing to offer SELEP's wholehearted endorsement of the joint funding bid between Epping Forest District Council, Harlow District Council and East Hertfordshire District Council for the Harlow and Gilston Garden Town.

Investment in a growing Harlow is, and will continue to be, a priority for SELEP and its partners in Essex. Improvements to the M11, the growth of the Enterprise Zone, and infrastructure investment around Harlow in particular all demonstrate a well-established shared commitment to the area. The concomitant establishment of the Garden Town will only increase future prospects for growth and business success and will keep the area as a major part of our vision for the future of the South East.

Yours Sincerely



Adam Bryan
Managing Director
South East Local Enterprise Partnership

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.

The London Stansted Cambridge Corridor is the UK's most dynamic and fastest growing 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 the UK average. Nearly 150,000 of the employees in this Corridor work in 'export intensive' industries which has grown at nearly three times the national average during the post recession period (2009-2014) and which contributed £20 billion to the national GVA in 2014.

At the heart of the Corridor, and very close to Harlow is London Stansted Airport which over the past two years has been Europe's fastest growing major airport, currently employing 11,000 people and with capacity to add another 10,000 jobs within current planning constraints.

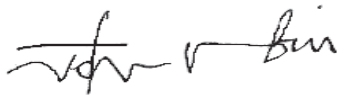
A recent independent review, the LSCC Growth Commission, noted the importance of the Corridor to the UK economy and suggested that it has the potential to become one of the world's leading tech and life sciences regions rivalling those in the US and Far East.

However, the Commission highlighted lack of housing and affordability as challenges to the Corridor's future prospects and also noted the importance of high quality 'place-making' to ensure the Corridor can attract and retain the businesses and the skilled workforce.

While much of the Corridor's growth has been located in Cambridge and London, the pace 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

A handwritten signature in black ink, appearing to read 'John McGill', written in a cursive style.

John McGill
Director, LSCC

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

20 September 2016

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.

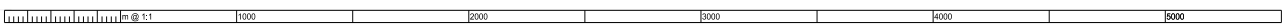
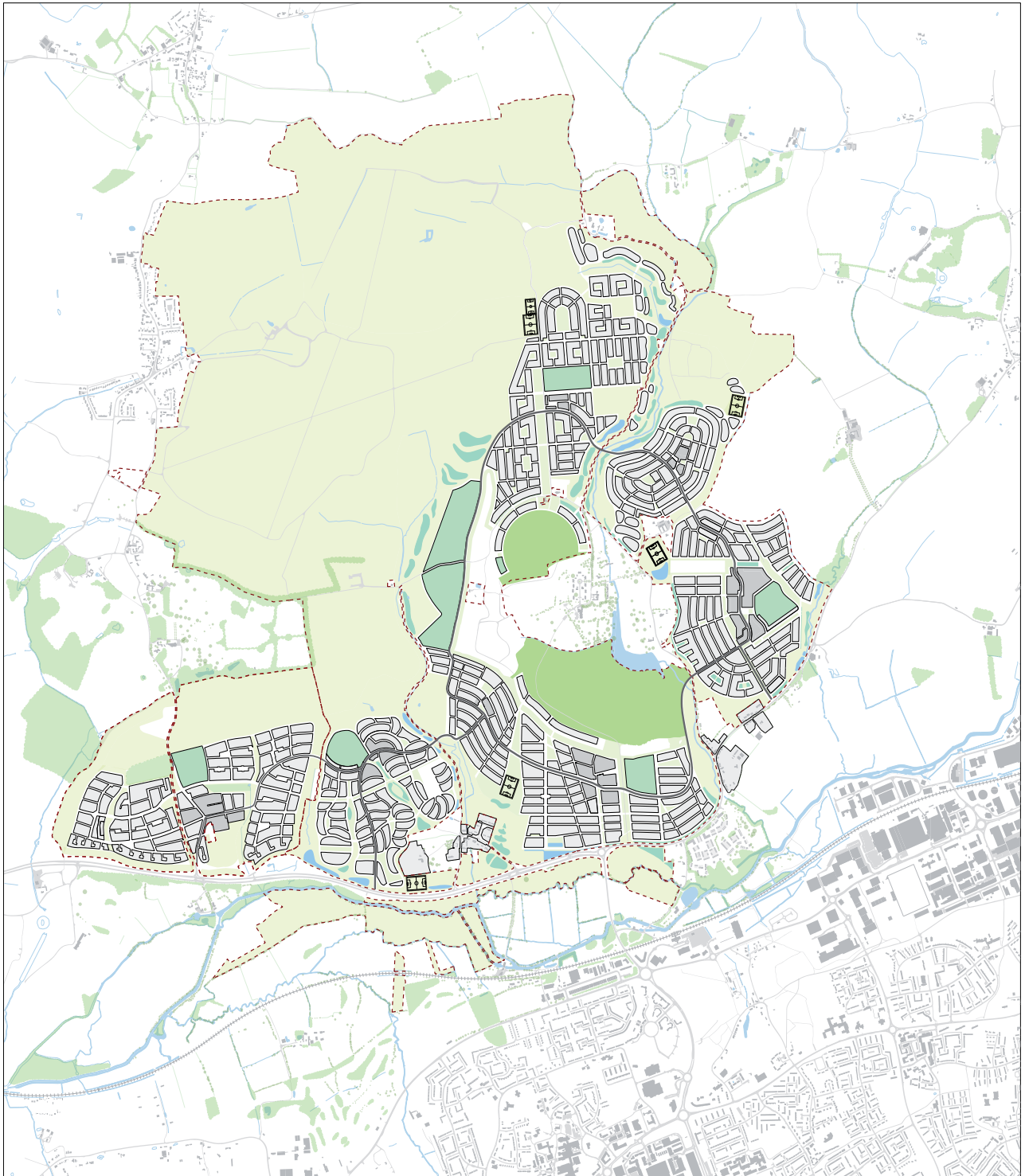
Yours sincerely



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



Chris Lovegrove
*Director
City & Provincial Properties*



© GRIMSHAW / RICK MATHER / FIGURE GROUND
A3
 N
 1:10000

Key

- Blocks Residential
- Blocks Mixed Use
- Blocks Community
- SuDS Wet Pond Zone
- SuDS Dry Pond Zone
- Gilston Area Site Boundary
- Primary Road Network

GILSTON AREA

GRIMSHAW	RICK MATHER	FIGURE GROUND
57 Gresham Road London EC2M 3NS	123 Camden High Street London N6A 1JH	54 Crown Works, Temple Street London E2 6QQ
T +44 (0)20 7291 4141 F +44 (0)20 7291 4156 E info@grimshaw-direct.com www.grimshaw-direct.com	T +44 (0)20 7290 1727 F +44 (0)20 7297 7826 E info@rickmather.com www.rickmather.com	T +44 (0)20 37746300 F +44 (0)20 37746300 E enquiries@figureground-direct.com www.figureground-direct.com

Title Gilston Area Illustrative Block Masterplan

Date	11.02.2016	Scale @ A1	1:10000
Drawn	DC	Checked	AB
Drawn		Authorised	

East Hertfordshire Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Harlow Council
Civic Centre,
The Water Gardens
College Square
Harlow CM20 1WG

Epping Forest District Council
Civic Offices
High Street
Epping
Essex CM16 4BZ

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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.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 9 MARCH 2017

REPORT BY LEADER OF THE COUNCIL

EQUALITY IMPACT ASSESSMENT OF THE EAST HERTS DISTRICT PLAN, MARCH 2017

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members an Equality Impact Assessment of the East Herts District Plan.

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the Equality Impact Assessment, March 2017, as detailed at Essential Reference Paper 'B' to this report, be agreed.

1.0 Background

1.1 East Herts Council aims to provide efficient and effective public services that are inclusive of all those living and working in the district. The Council wants to ensure that policies and services improve quality of life for all residents and employees, in ways that are both appropriate and accessible to the needs of different groups and individuals.

1.2 The District Plan sets out the Council's planning framework to guide future development and the use of land in the district. It identifies how East Herts will grow and develop whilst at the same time maintaining its attractiveness as a place to live, work and visit. The Plan covers the period 2011–2033. Once adopted, the policies in the District Plan will replace the policies in the Local Plan 2007.

1.3 In line with the Council's commitment to ensuring that its policies

improve the quality of life within East Herts and that the District Plan policies are inclusive, meet the needs of diverse communities and have outcomes and opportunities that are the same for all, an Equality Impact Assessment (EQIA) of the Plan has been undertaken. The full EQIA is included as **Essential Reference Paper 'B'**.

2.0 Report

- 2.1 The Equality Act 2010 contains a Public Sector Equality Duty which requires bodies such as local authorities to have 'due regard' to the importance of eliminating discrimination, advancing the equality of opportunity between those with identified characteristics and to foster good relations between those who have these 'protected characteristics' and those who do not. Protected characteristics include age, being or becoming a transsexual person, being married or in a civil partnership, being pregnant or having a child, having a disability, race, religion or belief, and gender.
- 2.2 Whilst there is no statutory requirement to undertake an EQIA of the District Plan, it is essential that a strategic document like the Plan fully considers the legal duties of the Equality act 2010. The EQIA also considers the consultation processes involved in the development of the Plan.
- 2.3 Part 1 of the EQIA provides the introduction of the assessment, while Part 2 provides a brief diversity profile of residents in East Herts, using data from the Office of National Statistics. The profile looks only at the identified 'protected characteristics' as set out above, and is not intended to be read as a full profile of the District.
- 2.4 Part 3 of the EQIA contains the assessment of the consultation processes used during the preparation of the District Plan. Part 4 of the EQIA contains the assessment of the Plan itself against each protected characteristic and those characteristics that are of importance in East Herts such as those who suffer from socio-economic disadvantages and those who live in the rural area.
- 2.5 Part 5 of the EQIA summarises and concludes the assessment. The assessment has shown that the District Plan will generally benefit all people who live, work and visit East Herts to some degree. While the Plan will have no impact on certain groups, there will be positive impacts for particular sections of the

community as defined in the Equality Act 2010, specifically for race, disability, age, religion or belief, being pregnant or having a child. In addition, the Plan will have positive impacts on those disadvantaged by socio-economic factors, and some residents who live in the rural area of East Herts. Where potential negative impacts are identified, these are considered to affect those who oppose or have pre-conceived ideas regarding the impact of development. These negative impacts are outweighed by the wider community benefits identified in this assessment.

3.0 Implications/Consultations

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

Background Papers

- More information on the Equality Act 2010 and the East Herts Comprehensive Corporate Equality Policy, Scheme and Action Plan is available at: <http://www.eastherts.gov.uk/article/9365/Equalities-Policy>
- Source data is from the 2011 Census
<http://www.neighbourhood.statistics.gov.uk>

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

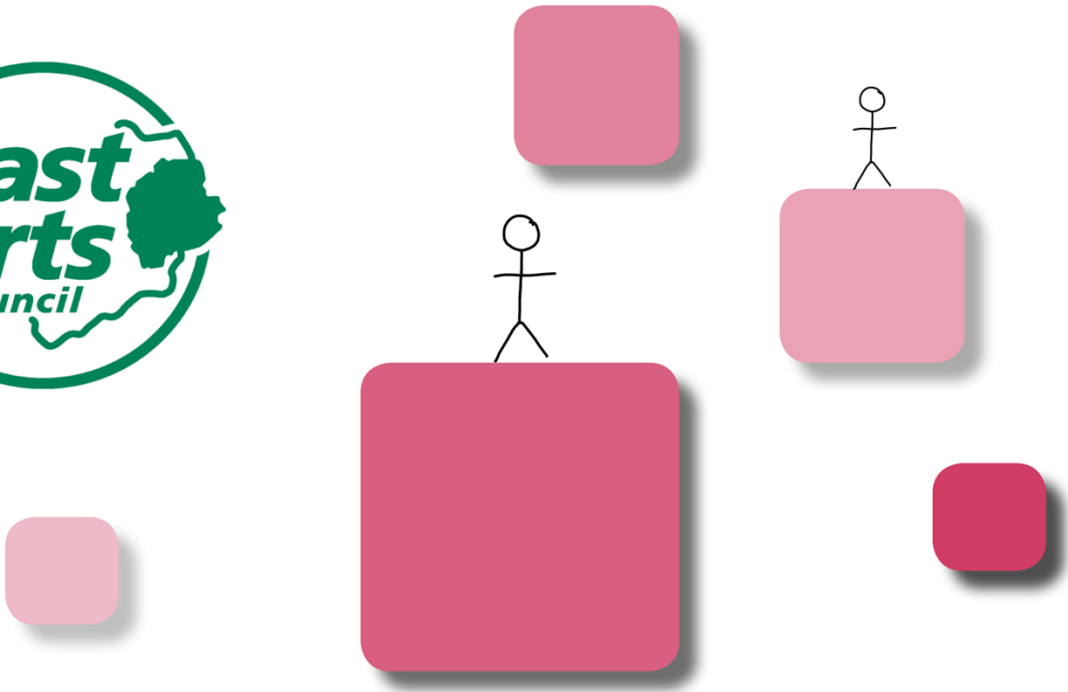
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ESSENTIAL REFERENCE PAPER 'A'

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:	The District Plan itself has been subject to statutory consultation.
Legal:	There are no direct legal implications arising from this report.
Financial:	There are no direct financial implications arising from this report for the Council.
Human Resource:	Staff resource is in place to ensure the ongoing monitoring of the District Plan against the Council's equality objectives.
Risk Management:	Ensuring that an Equality Impact Assessment of the District plan has been undertaken minimises the risk of the Council being challenged on the grounds of non-compliance with the Equality Act 2010.
Health and wellbeing – issues and impacts:	The District Plan in general will have positive impacts on health and wellbeing through a range of policy approaches that seek to create sustainable and inclusive communities.

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Equality Impact Assessment:

East Herts District Plan
2011-2033

March 2017



Contents

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1. Introduction

- 1.1 The term 'equality' means to ensure that different groups or individuals are treated fairly and in a manner specific to their needs. As such, it is about adapting services where possible or appropriate in such a way as to meet the needs of diverse communities and make certain that outcomes and opportunities are the same for all.
- 1.2 The concept of 'diversity' aims to understand, respect and value people's differences, and in doing so foster an inclusive environment and culture for everybody.
- 1.3 East Herts Council aims to provide efficient and effective public services that are inclusive of all those living and working in the district. We want to ensure that policies and services improve quality of life for all residents and employees, in ways that are both appropriate and accessible to the needs of different groups and individuals.
- 1.4 A more detailed account of the Council's actions to improve equality in the district can be found in the East Herts Comprehensive Corporate Equality Policy, Scheme and Action Plan 2016-2019. This sets out the Council's objectives for the next three years and ensures that the principles of equality influence service provision and staff employment. It is followed by all officers as they carry out their duties.
- 1.5 Further key actions taken by the council include:
 - Carrying out Equality Impact Assessments (EqIAs) when appropriate to inform planning and decision making, to ensure that policies do not disadvantage any group or individual, and to make sure there is fair and reasonable access to services for all.
 - Promoting equality of opportunity as an employer, in part through supporting the two ticks disability symbol awarded by Jobcentre Plus to employers who have a positive attitude towards job applications from disabled people. For further details, please see the Council's Equality and Diversity Report.
 - Actively working in partnership with the local voluntary and community sector to support those organisations to meet the diverse needs of the communities in East Herts.
- 1.6 Section 149 of the Equality Act is the Public Sector Equality Duty, which came into force in April 2011. It requires all public bodies, such as councils, to meet the needs of *all* individuals in day-to-day working operations. This includes when shaping policy, when delivering services and in relation to the Council's own employees.
- 1.7 In particular, it requires that public bodies:

1. Have 'due regard' to the importance of eliminating discrimination, harassment, victimisation and other such prohibited conduct;
2. Advance the equality of opportunity between those who share a relevant protected characteristic* and those who do not share it;
3. Foster good relations between those who share a relevant protected characteristic and those who do not share it.

* The protected characteristics, as set out in the Act, are:

- Age
- Being/becoming a transsexual person
- Being married/in a civil partnership
- Being pregnant/having a child
- Having a disability (defined as: if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative impact on your ability to do normal activities)
- Race (including colour, nationality, ethnic or national origin)
- Religion, belief or lack of religion/belief
- Sex
- For more information, see The Equality Framework for Local Government.

- 1.8 East Herts Council recognises that discrimination does not need to be intentional for unfair treatment or adverse impact to occur. The Council's approach to equality recognises that there is a range of different groups in the District who may have different needs and therefore the Council's services should be fairly and equitably provided to the whole community.
- 1.9 The District Plan sets out the Council's planning framework to guide future development and the use of land in the district. It identifies how East Herts will grow and develop whilst at the same time maintaining its attractiveness as a place to live, work and visit. The Plan covers the period 2011–2033. Once adopted, the policies in the District Plan will replace the policies in the Local Plan 2007.
- 1.10 The District Plan, together with the Minerals and Waste Local Plans for Hertfordshire and any adopted Neighbourhood Plans, form the Development Plan for the district. The Development Plan is the basis upon which planning applications must be determined, unless there are material planning considerations that indicate otherwise. The policies of the Development Plan should be read as a whole.

- 1.11 The District Plan is a long-term document which provides certainty to communities and businesses as to where development will be provided and, likewise, where development will be restricted. It also allows infrastructure providers to plan effectively for the future.
- 1.12 Whilst there is not a statutory requirement to undertake an Equality Impact Assessment of the East Herts District Plan, it is essential that a strategic document like the District Plan fully considers the legal duties under the Equality Act 2010. The purpose of carrying out an Equality Impact Assessment of the District Plan is to ensure that the Council has had due regard to the need to advance equality of opportunity and to remove or minimise disadvantages suffered by people by reason of their protected characteristics; that steps are taken to meet the needs of people from protected groups where these are different from those of other people; and to encourage people from these protected groups to participate in public life or other activities where their participation is disproportionately low.
- 1.13 This Equality Impact Assessment therefore considers not only the District Plan as a whole, but also the consultation processes involved in the development of the Plan itself.

2. East Herts Diversity Profile

Race

- 2.1 East Herts District has a limited diversity in terms of ethnic origin compared to the eastern region and the country as a whole. Census 2011 data indicates that 90% of the District's residents are White British, compared to 85% and 80% in the region and country respectively (figures are rounded).
- 2.2 The next largest ethnic groups in East Herts are White Other (4.04%) and White Irish (1.14%), meaning that the remaining ethnic groups constitute just 4.57% of the population. Of this 4.57%, the largest ethnic groups are Asian/Asian British; Indian (0.73%) and Mixed/Multiple Ethnic Groups; White and Asian (0.62%).
- 2.3 Whilst the level of diversity in East Herts is low, it is clear that the ethnicity of the District has changed since the 2001 Census, where 93.32% stated they were White British, 2.66% were White Other and 1.14% were White Irish. Similarly in 2001, the other largest ethnic groups were Asian British (0.93%), Mixed (0.91%), Chinese or Other Ethnic Group (0.66%) and Asian or Asian British: Indian (0.56%).
- 2.4 The East Herts Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment Update 2016 indicates that there are 8 Gypsy and Traveller households that meet the Government's 2015 definition, with the majority being Irish Travellers. The households comprised 33 residents – 16 adults and 17 children and teenagers under 18 (52% adults and 48% children and teenagers). There are a further 26 households who do not meet the new definition. However, six of these households have been

identified as Romany Gypsy or Irish Travellers who may be covered by equalities legislation. There are 16 Travelling Showperson households which meet the new definition, 13 of which have children.

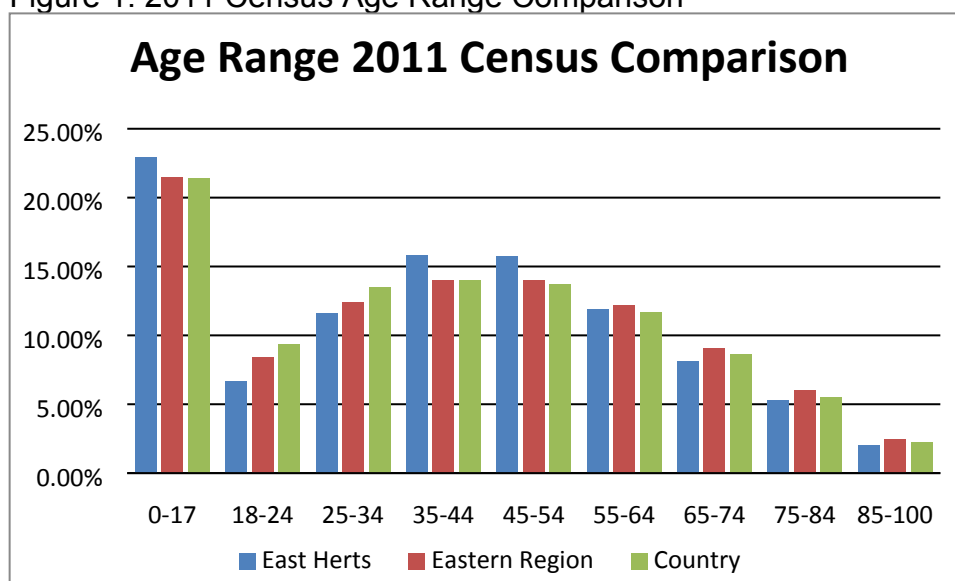
Disability

- 2.5 Statistics from the 2011 Census indicate that 20.6% of the District's population consider they have a long-term health problem or disability, compared to 24.6% in the East of England Region and 25.6% in the country as a whole.

Age

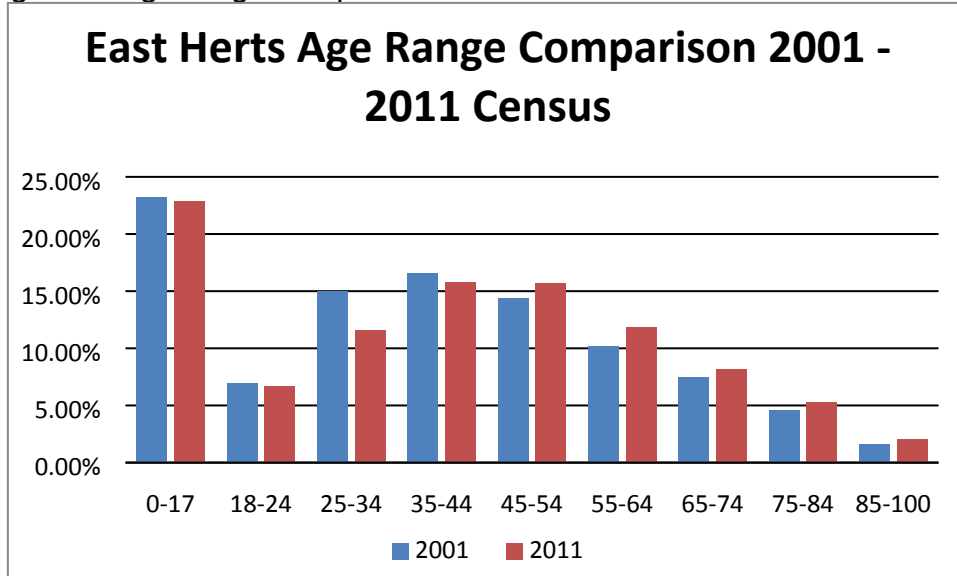
- 2.6 The 2011 Census records the East Herts population as 137,687 individuals. Figure 1 below illustrates the comparison between East Herts and the Eastern Region and country as a whole in terms of age ranges. East Herts has a slightly higher proportion of residents age 17 and under (22.90%) compared to the region (21.49%) and country as a whole (21.39%). However, there are fewer residents aged 18 to 24 and 25 to 34 in East Herts. East Herts has a higher proportion of residents aged between 35 and 44 (15.81%) and between 45 and 54 (15.70%) compared to the region (14.03% and 14.03%) and the country as a whole (14.03% and 13.73%), but there are fewer residents aged over 65 than the region and country as a whole (15.44% compared to 17.52% and 16.34% respectively).

Figure 1: 2011 Census Age Range Comparison



- 2.7 A comparison between the 2001 and 2011 Census in Figure 2 below illustrates that the population of East Herts is gradually getting older, with a greater proportion of the population older than 45 years of age compared to ten years ago. The 2015 Mid-Year Estimates indicate that this trend is continuing.

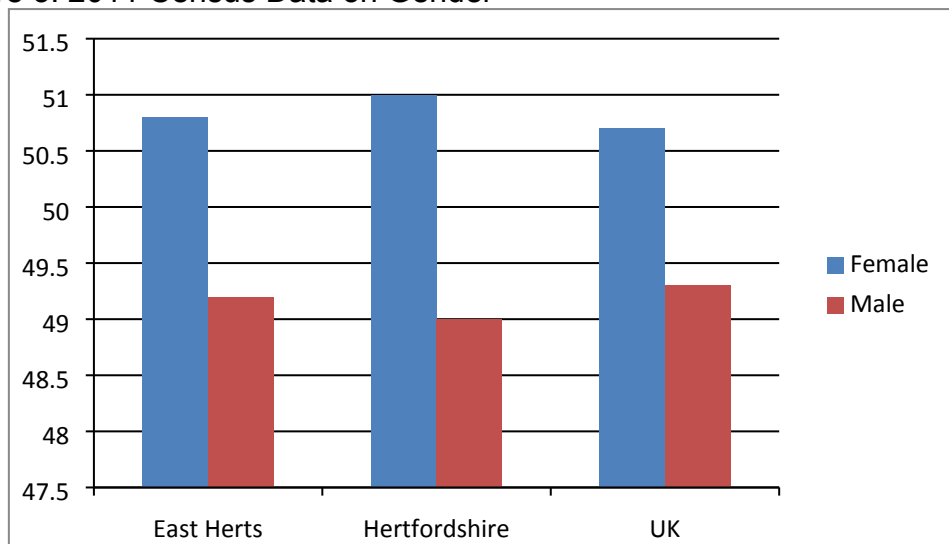
Figure 2: Age range comparison between the 2001 and 2011 Census



Gender

2.8 The 2011 census indicates that East Herts’ gender balance is in line with the county wide statistics. 49.2% of East Herts residents are male, and 50.8% of East Herts residents are female. Hertfordshire’s 2011 statistics indicate 49% of Hertfordshire’s residents are male and 51% of Hertfordshire residents are female. These statistics are also in line with national data where 50.7% of the population are female, and 49.3% of the population are male.

Figure 3: 2011 Census Data on Gender



Religion and belief

2.9 The 2011 census indicates that the highest proportion of East Herts residents are Christian (62.75%), this is slightly higher than the national average (59.38%). There are slightly more East Herts residents of no religion (27.75%), than the national average (24.74%). The other religious groups are

Hindu (0.45%) which is quite a lot lower than the national average (1.52%); Buddhist (0.32%) which is slightly lower than the national average (0.45%); Jewish (0.33%) which is also slightly lower than the national average (0.49%); Muslim (0.72%) which is substantially lower than the national average (5.02%); Sikh (0.12%) which is slightly lower than the national average (0.79%), and Other (0.32%) which is slightly lower than the national average (0.43%).

Sexual orientation

- 2.10 There is no current data available.

Transgender

- 2.11 There is no current data available.

Being married or in a Civil Partnership

- 2.12 East Herts currently has a slightly higher percentage of people living as a couple who are married or in a registered same-sex civil partnership than the East of England Region and England (52% compared to 49.4% and 45.9%).

Being pregnant or having a child

- 2.13 There is no data for pregnancy, only number of dependent children.
- 2.14 2011 Census data indicates that there are 17,778 dependent children in East Hertfordshire which is towards the top end of the county in terms of its number of dependent children. Only Dacorum and St Albans have slightly more dependent children, with 18,661 and 18,714 dependent children respectively. East Herts has more dependent children than Broxbourne with 12,371 dependent children; Hertsmere 13,059 dependent children; North Hertfordshire with 16,134 dependent children; Stevenage with 11,284 dependent children; Three Rivers with 11,358 dependent children; Watford with 11,930 dependent children; and Welwyn Hatfield with 13,186 dependent children.

Other Characteristics

- 2.15 In addition to the above protected characteristics, it is important to consider the issues that are distinct to East Herts. Therefore this assessment also considers the impact of the District Plan on those who are limited by socio-economic factors and those who live in rural areas.

People who are disadvantaged by socio-economic factors such as low incomes, skill or living in a deprived area, including homelessness

- 2.16 The most up to date information is from 2015 Indices of Multiple Deprivation data. East Herts' income deprivation is lower than that of Hertfordshire (6.9% compared to 9.7%). There is no data available for national income deprivation.

- 2.17 Child poverty is also low in East Herts compared to county and national averages. East Herts has 9.2% child poverty, compared to 13.2% county wide, and 20.1% nationally.
- 2.18 East Herts is substantially lower than the county wide figures in the 2015 Multiple Deprivation Indices for Education Skills and Training (10.0092 compared to 14.093). There is currently no national data available for this index.

Those who live in the rural area of East Herts

- 2.19 East Herts has a high number of residents who live in rural areas according to 2011 data. 29.5% of East Herts residents live in rural areas. This is much higher than the national average (17.6%), and the County average (11.5%).

Summary

- 2.20 The population of East Herts is distinctive and in some ways quite diverse. Unfortunately, the level of information available for each of the protected characteristic groups is currently not considered consistent or accurate.
- 2.21 However, it is important to consider if consultations carried out through the Plan-making process have engaged with the wide variety of people within the District, and then consider how the District Plan policies are likely to impact on these different parts of the East Herts community.

3. Assessment of the East Herts District Plan Consultation Process

- 3.1 Full details of the various stages of consultation undertaken throughout the Plan-making process are detailed in the Council's Regulation 22 Consultation Statement. All consultations are carried out in line with the Council's Statement of Community Involvement (SCI) and include activities that go beyond the requirements of Planning regulations.
- 3.2 The SCI acknowledges that in East Herts, 'hard to reach' groups may include young people, students, the elderly, ethnic minorities, gypsies and travellers, homeless people, single parent families, and people with disabilities. They may also include whole sections of the community living in the rural areas or more deprived areas of the district. The SCI also considers the need to ensure that those who have difficulty accessing information and those with limited time are able to become involved. The SCI therefore sets out how the Council will engage with the local community both in terms of the preparation of the District Plan, but also in relation to planning applications and Neighbourhood Planning.
- 3.3 In preparing the East Herts District Plan, the Council has undertaken a series of consultation activities to involve key stakeholders and the community in

developing the approach to development and policies within the Plan. The main consultation stages have been:

- Issues and Options Consultation, 2010
- Preferred Options Consultation, 2014
- Pre-Submission Consultation, 2016

Engagement Activities

- 3.4 The consultation events have included 'planning for real' exercises involving large scale maps and Lego-style bricks, visits to schools, informal drop in roadshow style events on Saturdays, and presentations with question and answer sessions held in the evening. The format of each session was carefully chosen to ensure it contained easy to understand information, that large print formats were available on request and that Officers were available to answer questions. Events were held at a variety of times in order to ensure that people had a number of options available depending upon working patterns/childcare etc. This was important not only for the public but also for Officers and Members attending.
- 3.5 Events were organised through various means including through Community Voice a community engagement forum, youth councils and youth conference, Bishop's Stortford Means Business and the Rural Conference. Events have also been organised directly with Town and Parish Councils.
- 3.6 There are a number of statutory stakeholders that need to be engaged in Plan-making. However, there is a wide range of other local groups that are regularly consulted, which include those representing disabilities and religious groups for example. There are 5,780 active contacts on this wider database which also includes individuals who are added to the database when they respond to the District Plan consultations to ensure they receive notifications of subsequent Plan-making stages. The database is also used to distribute the District Plan Bulletin, which provides updates of technical work and Plan-making activity.

Venues

- 3.7 Given the size of the district and the many different settlements, care has been taken to ensure that public events are held in local community halls in order to minimise the need for the public to travel and to ensure that they were already familiar to people. Each venue was chosen for their disabled access and availability of parking. Sound systems were provided where necessary, including hearing loops and a large screen projection system was used.

Published Material

- 3.8 In terms of published material, methods of engagement have included the distribution of leaflets, the delivery of a summary booklet to each household in the district, articles in the Council's Link Magazine, which is delivered to every household, articles in local newspapers and magazines, posters displayed across the district and formal adverts placed in local newspapers. Copies of

all published materials are also sent to every Town and Parish Council, displayed in libraries and in the Hertford and Bishop's Stortford Council offices.

- 3.9 All published material was also displayed on the Council's web site, with links direct from the front page. During consultation events people could respond via letter, email, by comment form or by using the Council's online consultation portal. The Issues and Options consultation included questionnaires with a Freepost return service. Comment forms could be left at either of the Council offices for free. All comments received were uploaded or transcribed into the consultation portal so anybody can view them.
- 3.10 In addition to the consultation documents, at each stage a series of Frequently Asked Questions (FAQs) were also prepared to assist in the understanding of the process. At the Preferred Options stage, a bespoke FAQ was prepared specifically for a younger audience.

Formal Engagement

- 3.11 There is also the formal democratic process where members of the public are able to attend the District Planning Executive Panel to hear Members and Officers discussing the evidence behind the District Plan. Each of these meetings are recorded and transmitted live via the Council's webcast facility, which are stored for at least six months for later perusal.

Consultation Feedback

- 3.12 Given the importance of providing feedback to those engaged in the Plan-making process, the results of consultation events are reported back to the District Planning Executive Panel. The Planning regulations require the Council to produce Consultation Statements which are produced following every stage of consultation.

Conclusions on Consultation Processes

- 3.13 Throughout the Plan-making process, the Council has engaged with or received responses from thousands of organisations/individuals. The Council has used a wide variety of consultation activities and events and has produced a range of publication materials from posters, leaflets and full documents. The high level of responses received indicates that consultation methods have been successful and inclusive. Although the Council aims to collect equalities data during each stage of consultation, this information is entirely voluntary, so it is not clear if all sections of the community have actively participated. We do know however, that people who respond to District Plan consultations are from a wide geographical area, with a large proportion of respondents from both rural and urban areas in and beyond East Herts.
- 3.14 It is considered that the consultation processes used throughout the Plan-making process has used all reasonable endeavours to be inclusive and to

engage with different sections of the East Herts community as defined in the Equality Act 2010.

4. Equality Impact Assessment of the East Herts District Plan

4.1 The District Plan is underpinned by a Vision and nine Strategic Objectives.

East Herts in 2033

1. The high quality environment of East Herts, its distinctive character and its economic prosperity will have been maintained.
2. New homes and jobs will have been provided through well designed and sustainable development. Local communities will have embraced Neighbourhood Planning to deliver their local objectives.
3. A range of sizes, types and tenure of new housing and accommodation will have been provided; including the provision of accessible and adaptable dwellings to meet the changing needs of occupants over their lifetime. There will be an increase in the overall stock of affordable housing including starter homes.
4. Working in partnership with other service providers, essential new and improved infrastructure to support the increased population of the District will have been delivered. Support will have been given to the retention of existing facilities and the provision of new facilities for leisure, recreation and cultural needs of the community. New development will have supported improved sustainable travel, including initiatives contained in Hertfordshire's 2050 Transport Vision. Mitigating measures will have helped ameliorate congestion, particularly on the A414.
5. The local economy in the District will have been supported, with provision having been made for the accommodation requirements of existing and new businesses. Important employment assets will have been retained. The emphasis will have been on sustainable economic development, of the right type and in the right place to meet employment needs both within the towns and in the rural areas.
6. The vitality and viability of the main towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware will have been safeguarded in a way that takes account of their distinctive roles. This will have been achieved through carefully planned development, which meets the needs of these centres, whilst recognising the importance of preserving and enhancing their historic character. In local and village centres shopping facilities that meet local needs will have been supported.
7. Outside of the main settlements, strategic development will have been accommodated to the east of Stevenage, east of Welwyn Garden City and in

the Gilston Area. These areas will have provided a range of homes, schools, facilities and services for the benefit of East Herts residents.

8. The rich heritage of historic buildings, features and archaeology in the District will have been protected and enhanced. The attractive landscape of East Herts, which contributes to its distinctive character, will have been conserved and enhanced.
9. New building will have contributed to the creation of sustainable communities, which are safe, attractive and inclusive and where the design of new development makes a positive contribution to the area in which it is located.
10. The rich biodiversity of East Herts will have been protected and enhanced. Where new development could potentially have an adverse effect on biodiversity and the ecological network of the District, measures will have been taken to ensure that the impact was either avoided or mitigated.
11. The District's rich and varied green infrastructure centred in the river valleys will have been re-connected and enhanced and its multi-functionality protected providing increased resilience to changing climates, improved ecological connectivity and new spaces for recreation and leisure.
12. East Herts will be more sustainable through measures to combat the effects of climate change. This will have been achieved by locating new buildings in the most sustainable locations so as to reduce car dependency and by ensuring through their design and construction, new buildings produce lower carbon emissions.
13. Measures will have been taken to adapt to the effects of climate change, which will have included steps to minimise the risk of flooding and reduce the demand for water as well as supporting the adaptation of buildings to cope with extremes of heat and cold in an energy efficient manner.

- 4.2 The following strategic objectives are the stepping stones to deliver the vision and form the basis of the policies contained in the District Plan:

Strategic Objectives

1. To mitigate the effects of climate change by reducing carbon dioxide emissions, supporting decentralised, low carbon and renewable energy and reducing the risk of flooding.
2. To encourage safe and vibrant mixed communities that provide for the needs of all East Herts residents including the young, the elderly and vulnerable people.

3. To balance the housing market by delivering a mix of market, low cost, and affordable homes and accommodating the housing needs of an ageing population.
4. To protect the countryside from inappropriate development and to protect and enhance the historic environment of East Herts, promoting good design that creates a distinctive sense of place.
5. To foster entrepreneurial endeavour through educational attainment and encourage small and medium enterprises through maximising existing employment opportunities and clusters and supporting rural diversification.
6. To improve access opportunities, minimise the need to travel, and encourage necessary journeys to be made by sustainable means to ease congestion and help reduce East Herts' carbon footprint.
7. To meet the needs of all of East Herts' communities by maintaining and improving existing facilities and providing new facilities including for arts, culture, community, leisure, entertainment, recreation, faith and health.
8. To reduce water consumption, increase biodiversity and protect and enhance the quality of existing environmental assets by, inter alia, creating new green spaces and networks of high quality green space for both recreation and wildlife.
9. To ensure that development occurs in parallel with provision of the necessary infrastructure, including enhancement and provision of green infrastructure.

4.3 The Vision and Strategic Objectives reflect the Plan's role in providing for all future and existing residents in terms of new homes and community infrastructure including jobs and retail opportunities within easy reach and accessible by public transport. Developments at strategic sites are required to provide community facilities including schools and open spaces on site and to make contributions to improving or expanding existing infrastructure to ensure that needs arising from developments are met.

4.4 Table 1 below assesses the Pre-Submission District Plan in terms of its potential impact on the identified equality groups - race, disability, age, gender, religion and belief, sexual orientation and transgender. Furthermore, it also considers the potential impact of the Plan on those groups whose characteristics are relevant to East Herts.

Table 1: Equality Impact Assessment of the East Herts District Plan

Equality	Positive	Negative	No Impact	Explanatory Text
Race	✓	✓		<p>The District Plan seeks to ensure that a range of housing options are provided, including through the allocation of sites for Gypsies and Travellers and Travelling Showpeople. In addition the Plan contains a criteria based policy for proposals for new park home sites for those who no longer fall within the Government's definition of Gypsies and Travellers and Travelling Showpeople. A full Accommodation Needs Assessment has been undertaken to identify the needs of these groups.</p> <p>There is the potential to strengthen the relationship between these groups and the settled community where sites are proposed as part of a wider development as issues such as access, privacy and security can be built in to the design of sites.</p> <p>However, there is also the potential that the 'settled community' feel disadvantaged or negatively affected by the proximity of such sites</p>
Disability	✓			<p>All new developments are designed to be compliant with the Building Regulations on disabled access. Policies HOU6 Specialist Housing for Older and Vulnerable People and HOU7 Accessible and Adaptable Homes both seek to ensure that new homes are provided which meet the needs of those who are less mobile or in need of specially adapted homes.</p> <p>Other policies within the Plan seek to ensure that new developments follow urban design principles, are designed to be easy to navigate, prioritise pedestrian movements and provide community facilities on site where necessary or make contributions to improving existing local community facilities where appropriate, including healthcare services.</p>
Age	✓			<p>The District Plan seeks to create communities that are inclusive for all ages, that comprise community facilities for young and old alike, provide schools and healthcare, provide a range of house type including family, adaptable or specialist</p>

Equality	Positive	Negative	No Impact	Explanatory Text
				<p>style homes. Affordable housing is important to younger and older people, and the Plan seeks to ensure a range of affordable homes are delivered as part of thriving mixed communities, in order to foster a sense of community and wellbeing.</p> <p>Open spaces provide space for play, sport and recreation and for gentle exercise and relaxation and these will be required as part of larger developments. Developments will also be expected to provide good pedestrian and cycle connections as well as improvements to public transport services, which are also of benefit to the young and old in particular. The creation of thriving communities will be of benefit to all age groups.</p>
Gender			✓	It is not considered that the Plan will have any impact on one gender or another. It is possible that the use of 'secured by design' standards could reduce the fear of crime, which tends to be higher in females, but any improvements in terms of creating safer neighbourhoods will be of benefit to the whole community.
Religion and Belief	✓			Facilities which enable the practice of faith and religious beliefs are covered within the community facilities section of the Plan and are supported by criteria based policy CFLR7 Community Facilities, and their loss is prevented through Policy CFLR8 Loss of Community facilities. The Plan seeks to encourage the integration of such groups through the sharing of facilities for multiple community uses.
Sexual Orientation			✓	It is not considered that the Plan has an impact on any particular sexual orientation.
Transgender			✓	It is not considered that the District Plan will have an impact on trans-gender issues.
Being married / in a civil partnership			✓	It is not considered that the District Plan will have an impact on those who are married or in a civil partnership any more so than any other individual or household.

Equality	Positive	Negative	No Impact	Explanatory Text
Being pregnant / having a child	✓			<p>The District Plan seeks to create communities that are inclusive for all individuals. Those who are pregnant or thinking of having children may have changing priorities in terms of looking for homes in the proximity of good schools and open spaces, and in locations where walking is deemed to be safer. The proximity of local shops and healthcare services may also become more important. Developments are required to provide local healthcare facilities and schools, play spaces and open spaces.</p> <p>Affordable housing is also important to those who need family sized homes and the Plan seeks to ensure a range of affordable homes and a mix of house sizes are provided.</p>
Those Disadvantaged by Socio-Economic Factors	✓			<p>The District Plan seeks to create mixed communities which provide a range of home options including affordable homes. Developments are also required to provide local services such as shops and healthcare facilities which are accessible within walking distance.</p> <p>New and/or improved public transport options will be provided through new development, connecting to town centres and other public transport options.</p> <p>The strategic development sites are required to provide land for employment generating activities. This can include traditional forms of business space, such as offices, light industrial or warehousing. But it can also include other employment generating activities such as in the care, education, retail or service industries.</p>
Those who live in the rural area	✓	✓		<p>The District Plan seeks to facilitate local decisions on the location and type of development through the Neighbourhood Planning process. This is seen as a positive by many communities.</p> <p>The village policies set out the approach to development in the rural area of East</p>

Equality	Positive	Negative	No Impact	Explanatory Text
				<p>Herts. New development in rural settlements can have many advantages; it can assist in creating thriving communities of a wider age ranges and life stages and can help to retain local services such as schools, community facilities and services, including public transport, local retail and commercial enterprises.</p> <p>The desire to maintain a rural idyll by restricting development make some villages a comparatively expensive and exclusive place to live. This lack of affordability is an issue for many who aspire to home ownership in the rural area and can cause issues with regards to the retention of those who work in the agricultural industry. Policy HOU4 Rural Exception Affordable Housing Sites provides the means to create affordable homes in the rural area which would otherwise be contrary to other policies within the Plan.</p> <p>However, those already within these settlements feel that the addition of new homes causes congestion and harms the character of settlements and can sometimes cause animosity between existing residents and those they see as ‘incomers’.</p> <p>As the quantum of development in the rural area is relatively small, compared to the overall distribution of development proposed across the District, individual development proposals do not lend themselves to the provision of new facilities on-site. Conversely, the proposed extensions to the District’s towns are large enough to be able to provide new facilities on site, and their proximity to existing services make them inherently more sustainable locations. This therefore means that in order to access some services, people who live in the rural area need to travel to their nearest town. However, rural public transport services are reducing in coverage and frequency and therefore this means that some rural residents will be disadvantaged by this approach.</p>

5. Summary and Conclusions of the Equality Impact Assessment

- 5.1 The assessment has shown that the District Plan will generally benefit all people who live, work and visit East Herts to some degree. While the Plan will have no impact on certain groups, there will be positive impacts for particular sections of the community as defined in the Equality Act 2010, specifically for race, disability age, religion or belief, being pregnant or having a child. In addition, the Plan will have positive impacts on those disadvantaged by socio-economic factors, and some residents who live in the rural area of East Herts.
- 5.2 No specific impacts have been identified in relation to the equality groups defined by gender, sexual orientation, transgender or those who are married or in a civil partnership. This is not unexpected given the strategic nature of the Plan.
- 5.3 Where potential negative impacts have been identified, these are considered to affect those who oppose or have pre-conceived ideas regarding the impact of development. These negative impacts are outweighed by the wider community benefits identified in this assessment.
- 5.4 Overall it is considered that no measures are felt to be required to mitigate the impacts that may arise as a result of the District Plan. However, the District Plan will be monitored regularly through the Authority Monitoring Report to measure whether and how well they deliver on their aims and whether changes are required through the District Plan review.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 9 MARCH 2017

REPORT BY LEADER OF THE COUNCIL

EAST HERTS DISTRICT PLAN – PROPOSED MINOR CHANGES, SUBMISSION AND EXAMINATION

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To agree a schedule of Proposed Minor Changes to the District Plan;
- To agree the submission of the District Plan and its supporting documents to the Planning Inspectorate on the 31st March 2017; and
- To set out the process, including indicative timelines, following submission of the District Plan to the Planning Inspectorate.

RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE

PANEL: That Council, via the Executive, be advised that:

(A)	the schedule of Proposed Minor Changes, as detailed at Essential Reference Paper ‘B’ to this report, be agreed, with any further additions authorised by the Head of Planning and Building Control, in consultation with the Leader of the Council;
(B)	the submission of the District Plan and supporting documents to the Planning Inspectorate on the 31st March 2017, be agreed;
(C)	the process following submission of the District Plan be noted; and
(D)	the Head of Planning and Building Control, in consultation with the Leader of the Council, be authorised to agree any further information required for the Examination.

1.0 Background

- 1.1 The District Plan sets out the Council's planning framework to guide future development and the use of land in the district. It identifies how East Herts will grow and develop whilst at the same time maintaining its attractiveness as a place to live, work and visit. The Plan covers the period 2011–2033. Once adopted, the policies in the District Plan will replace the policies in the Local Plan 2007.
- 1.2 The District Plan, together with the Minerals and Waste Local Plans for Hertfordshire and any adopted Neighbourhood Plans, form the Development Plan for the district. The Development Plan is the basis upon which planning applications must be determined, unless there are material planning considerations that indicate otherwise. The policies of the Development Plan should be read as a whole.
- 1.3 The District Plan is a long-term document which provides certainty to communities and businesses as to where development will be provided and, likewise, where development will be restricted. It also allows infrastructure providers to plan effectively for the future.
- 1.4 Work on the emerging District Plan has been ongoing now for a number of years. An Issues and Options consultation was undertaken in 2010. This was followed by a Regulation 18 Preferred Options consultation which was undertaken in 2014.
- 1.5 This report provides feedback on the Regulation 19 Consultation which was undertaken between 3rd November and 15th December 2016, and outlines the next steps in the process, including submission of the District Plan to the Planning Inspectorate and the subsequent examination.

2.0 Report

Response to Consultation

- 2.1 There was a significant response to the Regulation 19 Pre-Submission Consultation. In total 3,880 comments were received from 2,472 respondents.

- 2.2 All of the comments received (including those submitted online, those emailed and those received in hard copy) have now been processed and are available to view on the Council's consultation portal: <http://consult.eastherts.gov.uk>.
- 2.3 Whilst there is no legal requirement for the Council to formally respond to the comments received at this stage in the process, there is a requirement to produce a summary of the main issues raised. This summary is contained within the Regulation 22 Consultation Statement which can be found at Agenda Item 5. A considerable amount of time has been invested in producing a focussed and comprehensive statement of issues as this will be the first introduction that the Inspector will have to the likely issues to be addressed in the examination.
- 2.4 It should be noted that copies of all of the representations made will be submitted, in full, alongside the District Plan to the Planning Inspectorate.

Schedule of Proposed Minor Changes

- 2.5 Resulting in part from the comments raised there are a number of proposed minor changes to the District Plan. As such, a 'Schedule of Proposed Minor Changes' has been produced. The Schedule is intended to assist the Inspector in understanding the Council's position and outlines in Chapter order proposed minor changes to the Plan.
- 2.6 Minor changes are generally regarded as textual and grammar corrections; re-phrasing or limited new text to add clarity; or updates to figures and references which are necessary due to alterations which have been made elsewhere or for which new information has come to light.
- 2.7 The 'Schedule of Proposed Minor Changes' is a live document and will be updated periodically throughout the examination process, as necessary. A copy of the Schedule is available to view at **Essential Reference Paper 'B'**. The minor changes presented do not alter the overall scope of the District Plan, change the direction or affect the soundness of the document.

Submission and Examination

- 2.8 Following the Regulation 19 Consultation and the identification of the issues raised, the Council is not seeking to make any other

main modifications to the District Plan at this stage in the process. The Council considers that the District Plan is ready for examination and as such agreement is sought to submit the Plan and its supporting documents, as published at the Regulation 19 Stage, to the Planning Inspectorate on the 31st March 2017 in accordance with the Council's Local Development Scheme.

- 2.9 If the Inspector identifies in due course that there may be a need for main modifications to the Plan in order to resolve issues that would otherwise make the plan unsound or not legally compliant, then the nature and likely extent of the modifications will be fully discussed at the examination hearing sessions and may result in a subsequent further round of public consultation.
- 2.10 It is essential that the Council is equipped to move swiftly into the examination process once the District Plan has been submitted, making sure that the evidence base is complete, comments properly ordered and collated and that a Programme Officer is in place.
- 2.11 It should be remembered that the examination process starts on submission of the Plan and it is therefore important that time and resources are invested at this stage in the process to ensure that the Plan is dealt with as quickly and efficiently as possible. Key to this is ensuring that all the necessary practical arrangements have been put in place.
- 2.12 Work has already commenced in this respect with the recent appointment of an independent Programme Officer who will administer the process and act as a key point of contact between the appointed Inspector, Council Officers and interested parties who wish to appear at the examination.
- 2.13 The procedural timeline following submission of the Plan at the end of March 2017 is set out below. It should be noted that the timescales provided are indicative and will be agreed in due course between the Council and the Inspector.

Week 1

- Initial checks

Week 2

- The Planning Inspectorate will:
 - seek to appoint an Inspector;

- carry out an initial scoping on the Plan (procedure and content).

Weeks 3-4

- The Inspector will commence an early appraisal of the Plan and will make contact with the Programme Officer.
- The Inspector will give consideration to the matters and issues for examination, the structure of hearings, allocate participants to hearing sessions and decide whether additional material is needed from participants.
- The Council (and representors) may be asked to provide papers or responses on specific issues highlighted by the Inspector.
- The Inspector will confirm the hearing start date.

Week 5

- The Programme Officer will contact participants setting out the programme for hearing sessions including matters/issues and will circulate the Inspector's Guidance Notes.
- The Council and participants will start work on providing any material requested by the Inspector, including statements.
- The Council prepares answers to any questions raised by the Inspector.

End Week 7

- Responses and statements from the Council and participants are due.
- The Programme Officer clarifies and confirms attendance at the hearings.

Week 8

- The Programme Officer checks that the statements have been received and ensures that they are placed on the examination website.

Week 9

- The Inspector ensures that the programme for the hearing sessions including the agendas for the hearings is updated as necessary and placed on the examination website.
- The Programme Officer circulates final agendas for the discussions at each of the hearing sessions to the relevant participants.

Week 10+

Hearing Sessions Commence

- It is likely the hearing sessions will sit for up to 20-25 days, and maybe longer.
- The hearings are likely to sit for 3.5 days per week (Tuesday – Friday).

2.14 Given the number of Plans that are expected to be submitted to the Planning Inspectorate by the end of March 2017, it is not anticipated that the hearing sessions will commence before September 2017.

Evidence Library, Topic Papers and Additional Written Material

2.15 Submission of the District Plan will be supported by an evidence library, which will be available to view online and in hard copy.

2.16 A series of Topic Papers will also be submitted with the District Plan. The Topic Papers will highlight the information, evidence and feedback that have informed the choices made in formulating the strategy and policies in the District Plan. The Topic Papers will cover areas such housing, employment, transport, sustainability appraisal, site selection and Green Belt.

2.17 The intention of the Topic Papers is to provide background information for the Inspector; they will not contain any new policies, proposals or site allocations. Work on the Topic Papers is currently underway and will be finalised to accompany the submission of the District Plan to PINS at the end of March.

2.18 It is also likely that additional written material will be required by the Inspector in due course, for example, seeking clarification of issues raised; responding to questions; further modifications; statements of common ground etc.

2.19 Authority is therefore sought that the Head of Planning and Building Control, in consultation with the Leader of the Council, is able to agree the detail of the Topic Papers together with any further information that is required by the Inspector for the Examination.

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>

The Council's Local Development Scheme is available at:
<http://www.eastherts.gov.uk/lds>

The Council's District Plan and supporting information is available at:
<http://www.eastherts.gov.uk/districtplan>

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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 wide range of consultation has been undertaken in preparing the District Plan. Specific consultation on the Pre-Submission District Plan took place between the 3 rd November and 15 th December 2016.
Legal:	There are no direct legal implications arising from this report.
Financial:	There are no direct financial implications arising from this report. The cost of preparing a District Plan is significant and has been budgeted over the duration of its preparation.
Human Resource:	Staff resource is in place to ensure the ongoing timely preparation of the District Plan.
Risk Management:	The efficient and timely progression of the District Plan is of paramount importance and a risk assessment has been carried out to ensure that the preparation of the Plan takes place in accordance with the Council's Local Development Scheme. Without an adopted District Plan the district will be vulnerable to further unplanned development.
Health and wellbeing – issues and impacts:	The 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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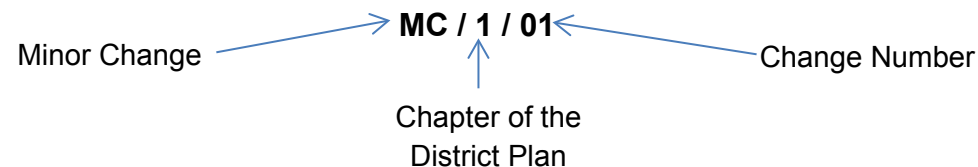
Schedule of Proposed Minor Changes to the East Herts Pre-Submission District Plan

This schedule outlines the proposed minor changes to the East Herts Pre-Submission District Plan. The proposed amendments seek to update the document and improve clarity. Minor changes are generally considered as grammatical and textual amendments; re-phrasing or limited addition of new text; or updates to numbering, figures, references and internet links which are required as a result of alterations elsewhere or due to the emergence of new information. The minor changes presented do not alter the overall scope of the District Plan, change the direction or affect the soundness of the document. The minor changes have been identified:

- In response to the representations received through the Regulation 19 Consultation; and
- By the Council following the consultation period.

This document is intended to assist the Inspector and will be available as an Examination Document. The document will be updated when necessary. The proposed Minor Changes are listed in the document order of the District Plan and for each change the schedule includes the following information:

Ref. No: Change identification number. The reference number is composed of:



Policy/Para: The specific policy/paragraph to which the change applies.

District Plan Page: Page Number of where the applicable policy/paragraph is located.

Proposed Minor Change: Details of the proposed change. Where text is to be deleted it will have a strike through e.g. ~~deleted text~~. Where additional text is proposed, it will be in bold e.g. **additional text**.

Reason for Change: The reason why the minor change is proposed e.g. to correct a typo or to update information.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
Chapter 1: Introduction				
Chapter 2: Vision and Strategic Objectives				
MC/2/	2.2.7	15	<ul style="list-style-type: none"> • 3 sites of international nature conservation designations • 1 National Nature Reserve at Broxbourne-Hoddesdonpark Woods • 44 15 Herts and Middlesex Wildlife Trust Reserves • 16 sites of Special Scientific Interest • 541 non-statutory Wildlife Sites 	Corrections at the request of HCC.
Chapter 3: The Development Strategy				
Chapter 4: Green Belt and Rural Area Beyond the Green Belt				
Chapter 5: Bishop's Stortford				
MC/5/	BISH3, Part II	50	Prior to the submission of a detailed planning application, reserved matters planning applications (pursuant to outline planning permission 3/13/08/04) a Masterplan will be collaboratively prepared, involving site promoters, landowners, East Herts Council, Hertfordshire County Council, Bishop's Stortford Town Council and other key stakeholders.	Correction identified by JB Planning Associates on behalf of Lynda and Bernard Hughes.
MC/5/	BISH3, Part	50	III. In order to ensure that the site is planned and	Clarification at the

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
	III		delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the masterplan, and will not prejudice the implementation of the site as a whole. Outside of the 3/13/08/04/OP permission area, development proposals should have regard to the masterplan (if available).	request of JB Planning Associates on behalf of Lynda and Bernard Hughes.
MC/5/	5.3.14	54	A collaborative approach to masterplanning which forms the basis of a Supplementary Planning Document is considered to be essential to the preparation of this site to guide development in the short and longer term.	Clarification at the request of Andrew Martin Planning on behalf of Countryside Properties.
MC/5/	BISH5, Part III (n)	57	Maintain and enhance ecological connections to existing green infrastructure assets such as Southern country Park and the Thorley Flood Pond SSSI and nature reserve Stort Valley;	Clarification to address concerns of Natural England.
MC/5/	BISH5, Part III (o)	57	Layout and orientation of spaces to facilitate views and vistas beyond the site, in particular towards Thorley church and Wallbury Camp , protecting and enhancing the setting of listed buildings along London Road where necessary. This may be done through careful layout, design and planted screening;	Clarification to address concerns raised by Historic England.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
MC/5/	BISH6, Part III (c) (New criterion)	59	(c) Provision of land to facilitate the expansion of Thorley Hill Primary School (subsequent number changes following insertion of new criteria)	Clarification requested by HCC Property (Development Services).
MC/5/	BISH7 Part III	60	In the context of this, the Goods Yard will provide for at least 400 homes between 2017 and 2027, as part of a mixed use development including a significant amount of B1a office floorspace, and small-scale retail provision and other community and leisure uses...	Savills on behalf of Solum Regeneration suggest that the site can accommodate a range of non-residential uses.
MC/5/	BISH9	66	...and upgrades to the localised sewerage network in order to serve the proposed development.	Clarification requested by Weston Homes.
MC/5/	BISH10 Part II (b)	68	The Mill Site will provide a new riverside hub of leisure and commercial uses with active frontages on the ground floor with residential and/or B1 office space on upper floors. Such development will not prejudice the continued operation of the mill and residential uses will only be permissible if the Mill ceases to operate on the site and the employment land designation is subsequently removed;	Clarification at the request of Rapleys/Silverspoon to ensure redevelopment does not prejudice the continued use of the site for employment purposes.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
Chapter 6: Buntingford				
MC/6/	6.1.12	75	Financial contributions towards the implementation of a Community Transport project have been secured from some of the approved development schemes in the town which will, once established, provide a valuable service to the residents of the town and neighbouring villages.	Clarification at the request of Buntingford Town Council.
MC/6/	BUNT1	77	In accordance with Policy DPS3 (Housing Supply 2011-2033), development proposals will be permitted within the town settlement boundary as defined on the Policies Map,	Correction identified by Buntingford Town Council.
Chapter 7: Hertford				
MC/7/	7.2.10	92	As the phasing of development will need to ensure that underlying mineral deposits in the locality can be satisfactorily extracted and that such resource is not sterilised, 50 dwellings will be provided by 2022 on the Bengoe Nursery site, with a further 100 dwellings provided by 2027, subject to the prior completion of minerals extraction on the adjoining site, where this would impact on the ability of the development to be delivered.	HCC Minerals request so that focus is solely related to the sterilisation of potential mineral reserves within HERT4.
Chapter 8: Sawbridgeworth				

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
Chapter 9: Ware				
MC/9/	9.1.2	114	In the past, the river has underpinned the town's economic function, but is now more widely used as a leisure resource. Ware also benefits from other excellent sporting and leisure facilities including, but not limited to: Wodson Park sports centre; Fanshawe Pool and Gym; Ware Lido; Place House; Ware Arts Centre and Fletcher's Lea at The Priory. The Lee Valley Regional Park, which bounds the south of the town, along with other woodland and countryside access opportunities are also available to Ware's residents and visitors.	Request of Ware Arts Centre to incorporate this facility into text.
MC/9/	WARE2, Part V (m)	121	(m) primary school/s (including early years provision) commensurate with the level of development to serve both the development and appropriate surrounding catchment area/s locality ;	Clarification at the request of HCC Property (Development Services).
MC/9/	WARE2, Part V (n)	121	(n) secondary school provision commensurate with the level of development within a site suitable for the provision of at least six forms of entry to serve the development and the wider Hertford and Ware Schools Planning A area ;	Clarification at the request of HCC Property (Development Services).
Chapter 10: Villages				
MC/10/	VILL1, Part	129	II. Within the Group 1 Villages of Braughing,	Officer correction.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
	II		Hunsdon, Much Hadham, Standon & Puckeridge, ad Walkern, as defined on the Policies Map, development for housing, employment, leisure, recreation and community facilities will be permitted subject to (VI) (VII) below and all other relevant policies in this Plan.	
MC/10/	VILL1, Part III	130	III. Within the Group 1 Villages of Hertford Heath, Stanstead Abbots & St. Margarets, and Watton-at-Stone, as defined on the Policies Map, development for housing, employment, leisure, recreation and community facilities will be permitted subject to (VI) (VII) below and all other relevant policies in this Plan.	Officer correction.
MC/10/	10.2.8	130	Infill development This development should take place within the main built up area of the village as defined on the Policies Map.	Clarification at the request of Datchworth Parish Council.
MC/10/	10.2.9	130	As with Group 1 Villages, Parish Councils may consider that the most appropriate way to plan for their community's needs is by preparing a Neighbourhood Plan. In villages located in the Rural Area Beyond the Green Belt, this may include development on the periphery of the main built up area of the village. Therefore, in addition to limited infill development, small-scale	Officer clarification.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
			development identified in an adopted Neighbourhood Plan will be permitted. In villages located in the Rural Area Beyond the Green Belt, this may include development on the periphery of the main built up area of the village.	
MC/10/	10.2.10	131	No specific housing target has been identified for these Group 2 Villages.	Officer clarification.
MC/10/	VILL2, Part III	132	III. In addition, small-scale development identified in an adopted Neighbourhood Plan will be permitted. Prior to a Parish Council preparing a Neighbourhood Plan, development in the villages listed above will be limited to the built up area as defined on the Policies Map.	Addition to text at the request of Datchworth Parish Council.
MC/10/	10.3.2	134	In addition, village development boundaries in Group 2 Villages located in the Rural Area Beyond the Green Belt may also be amended through the formulation of a Neighbourhood Plan to identify sites to accommodate small-scale development proposals.	Officer clarification.
MC/10/	VILL4, Part II	135	II. The District Council will expect at least 250 300 homes to be delivered in the villages in the period 2017-2022.	Correction of figure to accord with Strategy Worksheet/DPS3, identified by

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
				Sworders on behalf of Haileybury College.
MC/10/	VILL4, Part III	135	On the basis that at least 250 300 homes are delivered in the period 2017-2022 then the District Council will continue to monitor the situation in the period 2022-2027 and if a shortfall in delivery is identified during this timeframe, then, as with (II) above, a requirement for the District Council to identify specific sites for housing through a review of the District Plan will be triggered.	Correction of figure to accord with Strategy Worksheet/DPS3, identified by Sworders on behalf of Haileybury College.
Chapter 11: The Gilston Area				
MC/11/	11.2.7	139	Within the north and north western sections of the site, a substantial amount of public open space in the form of managed parklands will be provided as part of wider managed parklands including continuing farming will be provided.	Clarification at the request of Quod on behalf of Places for People.
MC/11/	GA1, Part III (o)	143	(o) protection and enhancement of heritage assets the historic environment and their its settings.	Clarification at the request of Historic England.
MC/11/	11.3.2	144	The eastern crossing is the option preferred by Essex County Council, largely because of the way in which it as it provides relief to	Clarification at the request of Essex County Council.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
			junctions along the western end of the A414 Edinburgh Way in Harlow, and enhances access to the Enterprise Zone and links through, potentially, to the proposed new motorway Junction 7a.	
Chapter 12: East of Stevenage				
MC/12/	Figure 12.3, Key	154	Possible enhancement of road network right of way network	Officer correction.
Chapter 13: East of Welwyn Garden City				
MC/13/	EWEL, Part III	161	III. A joint masterplan setting out the quantum and distribution of land uses, key views to protect heritage assets , access, sustainable design and layout principles will be prepared by Welwyn Hatfield Borough Council and East Herts District Council, working with the landowner and other key stakeholders.	Clarification at the request of Historic England to take account of the recommendation of the Heritage Impact Assessment and the need for further work on views.
MC/13/	EWEL, Part V	161	The developer must demonstrate the extent of the mineral that may be present and the likelihood of prior extraction.....	Clarification at the request of Hertfordshire County Council in line with the supporting text.
MC/13/	EWEL, Part	161	Education facilities, including one 2 form entry	Clarification at the

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
	VI (f)		primary school with Early Years provision in Welwyn Hatfield and an all-through school in East Herts comprising a 2 primary and secondary school provision in East Herts comprising land sufficient for a 3 form entry primary school with Early Years provision and a secondary school of up to 8 forms of entry.	request of Hertfordshire County Council in line with the supporting text.
MC/13/	EWEL1, Part VI (j)	162	j) Protection and enhancement of heritage assets and their settings, both on-site and in the wider area through careful masterplanning and appropriate mitigation measures;	Clarification at the request of Historic England.
MC/13/	Figure 13.3	163	Figure 13.23 Strategy Diagram- Land East of Welwyn Garden City	Officer correction.
Chapter 14: Housing				
MC/14/	14.2.2	166	The Older People's Housing Requirements Technical Study (2013);	Officer deletion of out of date study.
MC/14/	Text box following 14.2.3	168	The London Commuter Belt (East) Sub-Region: Older People's Housing Requirements Study (October 2013) can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/olderpeoplestudy	Officer deletion of out of date study.
MC/14/	Text box following 14.2.3	168	The Council's latest Housing and Health Strategy can be viewed and downloaded from the Council's Website at:	Officer correction.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
			www.eastherts.gov.uk/housing	
MC/14/	Text box following 14.4.17	174	The Affordable Housing and Lifetime Homes' (2008, or as amended) Supplementary Planning Document can be viewed and downloaded at: www.eastherts.gov.uk/affordablehousing http://www.eastherts.gov.uk/spd	Officer update to web link.
MC/14/	HOU9	186	II. (h) the site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains. All highly vulnerable development should be located within Flood Zone 1;	Environment Agency suggested additional wording to reflect national policy.
Chapter 15: Economic Development				
Chapter 16: Retail and Town Centres				
MC/16/	RTC3 / Policy Map	210	Modification to extend the Primary Shopping Frontage in Ware to encompass units in Star Street as far as the Sainsbury's Local	Request by Sainsbury's Supermarket Ltd.
MC/16/	16.8.6 Table	212	Neighbourhood Centre <ul style="list-style-type: none"> • Bishop's Park, Bishop's Stortford North • Bishop's Stortford North 	To address error raised by the Bishop's Stortford Civic Federation.
MC/16/	16.8.6 Table	212	Local Parade Villages <ul style="list-style-type: none"> • Standon 	To address error raised by Standon

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
			<ul style="list-style-type: none"> Puckeridge 	Parish Council.
MC/16/	RTC5, Part II	213	Proposals that result in the loss of individual shops will be resisted and will be considered in accordance with Policy CFLR7 8 (Loss of Community Facilities)	Officer correction.
Chapter 17: Design and Landscape				
MC/17/	17.3.6	218	The Building Research Establishment has established a new Home Quality Mark to replace Building for Life the Code for Sustainable Homes which was revoked in the National Standards Review Review 2015	Officer clarification.
MC/17/	17.7.7	221	Many hedgerows throughout the district are considered as being 'important' (as defined under the Hedgerows Legislation-Regulations, 1997).....	Clarification at the request of HCC and East Herts Landscape Officer.
MC/17/	Text box following 17.7.9	222	The Landscape Character Assessment Supplementary Planning Document (2007, or as amended) can be viewed and downloaded at: www.eastherts.gov.uk/landscapecharacterspd http://www.eastherts.gov.uk/spd	Officer update to web link.
MC/17/	17.7.10	222	Landscape issues must be regarded as an integral part of the site planning and layout phase of the design and development planning process.	Clarification at the request of East Herts Landscape Officer.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
MC/17/	17.7.13	223	Advice on existing trees and hedgerows , new planting and arboricultural constraints.....	Clarification at the request of East Herts Landscape Officer.
MC/17/	17.7.15	223	The Council welcomes landscape design which incorporates principles of green space infrastructure as well as sustainability such as...surfaces which increase the permeability of the ground (such as SUDS or multifunctional green space infrastructure)....	Clarification at the request of East Herts Landscape Officer.
Chapter 18: Transport				
MC/18/	18.1.8		Green Travel Plans can also help assist in modal shift e.g. via lift sharing schemes, Smarter Choices, readily accessible public transport information, working from home, car clubs, etc. Nonetheless, within the rural parts of the district the dispersed settlement pattern with related lower levels of passenger transport provision and attendant high levels of car dependency make the provision of realistic alternatives to the private car more challenging. Therefore, while supporting and encouraging a reduction in car usage, it is necessary to recognise the importance of private motorised transport in enabling the population of more rural	Clarification at the request of Essex County Council.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
			locations to access key facilities and services.	
MC/18/	Textbox following 18.4.3	234	The Vehicle Parking Provision at New Development Supplementary Planning Document (2008, or as amended) can be viewed and downloaded at: www.eastherts.gov.uk/vehicleparkingstandards	Officer update to web link.
Chapter 19: Community Facilities, Leisure and Recreation				
MC/19/	19.6.4	244	Further information on the Council’s approach to nature conservation and green infrastructure can be found in Chapter 19 20 : Natural Environment.	Correction identified by HCC Ecology.
Chapter 20: Natural Environment				
MC/20/	20.2.2	254	Applicants will be expected to seek the advice of the Herts and Middlesex Wildlife Trust, the Hertfordshire Environmental Records Centre, Hertfordshire Ecology at the County Council, Countryside Management Service , Natural England, and other advisory groups relevant local nature partnerships where appropriate.....	Clarification at the request of Hertfordshire County Council
MC/20/	20.2.2	254	...where proposals affect or have the potential to affect the natural environment and nature conservation assets, including valued landscapes, geological conservation interests and soils.	Clarification at the request of Natural England
MC/20/	Table 20.1	255	Local Wildlife Sites (LWS)	Clarification at the request of the Herts

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
				and Middlesex Wildlife Trust
MC/20/	20.2.7	256	There are currently 544 541 Local Wildlife Sites in the district....	Clarification at the request of Hertfordshire County Council
MC/20/	20.2.10	257	...To ensure they are consistently quantified, applications must be accompanied by a Biodiversity Impact Assessment using the locally approved DEFRA Biodiversity Metric. the application of the DEFRA and NE endorsed Biodiversity Impact Assessment Calculator (Warwickshire County council V18 2014 or as updated) will be required for all development with negative impacts on biodiversity.	Clarification at the request of the Herts and Middlesex Wildlife Trust
MC/20/	Policy NE1, Part II	257	Where a site of International or National designation for nature conservation importance is adversely affected by the proposals, permission will be refused unless the District Council is satisfied that... (c) There are no satisfactory alternatives to the proposal.	Clarification at the request of Hertfordshire County Council
MC/20/	Policy NE1, Part IV	258	Ecological impacts will be quantified by utilising the locally approved DEFRA Biodiversity Metric. Impact Assessment Calculator (BIAC).	Clarification at the request of the Herts and Middlesex Wildlife Trust

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
MC/20/	Policy NE2, Part I	258	All proposals should achieve a net gain in biodiversity, as measured by using the locally approved DEFRA Biodiversity Metric BIAG....	Clarification at the request of the Herts and Middlesex Wildlife Trust
MC/20/	20.3.3	258	...Through the use of the locally approved Biodiversity Metric BIAG, the ecological value of these habitats can be quantified...	Clarification at the request of the Herts and Middlesex Wildlife Trust
MC/20/	20.3.13	261	...and where possible restore the negative impact of previous development – e.g. the naturalisation of canalised or culverted water courses canalisation or culverting of rivers or streams.	Clarification at the request of East Herts Council Environment and Engineering
MC/20/	Policy NE3, Part I	261	The biodiversity value of a site pre and post development will be determined by applying the locally approved Biodiversity Metric BIAG.	Clarification at the request of the Herts and Middlesex Wildlife Trust
MC/20/	Policy NE3, Part VII	262	Development adjoining rivers or streams must provide a minimum of an 8m 40m buffer of complimentary habitat...	Officer clarification for consistency with Policy WAT3.
MC/20/	Textbox following 20.4.2	262	The Council's Green Infrastructure Plan can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/gip http://www.eastherts.gov.uk/technicalstudies	Officer update to web link.
MC/20/	Policy NE4,	264	IV. Proposals which affect the district's river	Officer deletion of

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
	Part IV		environments, including built development and recreation and leisure proposals, should take into account and contribute towards achieving, the aims of any statutory or non-statutory plans, such as the Lee Valley Regional Park Authority Park Development Framework, the Bishop's Stortford Waterspace Strategy , relevant River Catchment Management Plans and the Water Framework Directive, and any future relevant plans and programmes.	out of date study.
Chapter 21: Heritage Assets				
MC/21/	21.2.2	266	<ul style="list-style-type: none"> • 15 16 Registered Parks and Gardens... 	Clarification at the request of Historic England
MC/21/	21.2.5	267	Non-designated heritage assets are being identified through ongoing monitoring as well as through the Conservation Area Appraisal work that the Council is currently undertaking, and through future updates to in the Historic Parks & Gardens SPD 2007.	Clarification at the request of Hertfordshire county Council.
MC/21/	Textbox following 21.6.6	275	The 'Historic Parks & Gardens' Supplementary Planning Document (September 2007, or as amended) can be viewed and downloaded at:	Officer update to web link.

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change
			www.eastherts.gov.uk/historicparksandgardensspd http://www.eastherts.gov.uk/spd	
MC/21/	Policy HA2, Part I	268	The council will engage with key stakeholders and with local communities to identify...	Clarification at the request of Hertfordshire county Council.
Chapter 22: Climate Change				
Chapter 23: Water				
MC/23/	WAT6	292	I. Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with advance of the occupation of development.	Clarification at the request of Savills on behalf of Thames Water.
MC/23/	23.6.4	292	East Herts Council will seek to ensure that there is adequate wastewater network infrastructure to serve all new developments.	Clarification at the request of Savills on behalf Thames Water.
Chapter 24: Environmental Quality				
Chapter 25: Delivery and Monitoring				
Appendices				
Other				

Ref No.	Policy/Para	District Plan Page	Proposed Minor Change	Reason for Change

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 9 MARCH 2017

REPORT BY LEADER OF THE COUNCIL

EAST HERTS INFRASTRUCTURE DELIVERY PLAN, FEBRUARY 2017

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To present to Members the East Herts Infrastructure Delivery Plan, February 2017.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the East Herts Infrastructure Delivery Plan, February 2017, as detailed at Essential Reference ‘B’ to this report, be supported as part of the evidence base to 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 update the Infrastructure Delivery Plan as required for the Examination.

1.0 Background

1.1 In order to successfully deliver the identified level of growth across the District, new housing must be supported by improvements to existing infrastructure, and where necessary, creation of new infrastructure. Therefore the identification of required schemes is a fundamental part of the plan making process.

1.2 National policy requires local planning authorities to prepare an Infrastructure Delivery Plan (IDP) in order to support the implementation of a local plan. This report presents the second

version of the IDP which, will be submitted to the Planning Inspectorate in March 2017 alongside the East Herts District Plan.

2.0 Report

2.1 The purpose of an IDP is to identify the infrastructure schemes that are required in order to successfully deliver planned growth across the District. In addition, the IDP should provide information on the cost of schemes, likely funding sources and phasing. The IDP, which forms **Essential Reference Paper B**, has been prepared in collaboration with site promoters/developers and service providers, including Hertfordshire County Council.

2.2 At present, it is not possible to identify costings, funding and phasing information for all infrastructure schemes. However, this area will be continuously updated as and when information becomes available.

2.3 In particular, Members should note that Officers are currently working with NHS England and the East and North Hertfordshire Clinical Commissioning Group (CCG) in order to gather information on the following:

- The capacity of existing health facilities in East Herts;
- The facilities that would require expansion as a result of planned growth;
- Where new facilities would be required as a result of planned growth, and the services they should provide;
- How much new or expanded facilities would cost and the funding options for their delivery

2.4 This information is expected to be forthcoming prior to submission of the District Plan to the Planning Inspectorate at the end of March. Officers are also working with the County Council's Countryside Management Service to identify green infrastructure schemes that are planned across the District.

2.5 As such, it is likely that further updates to the IDP will be required prior to the Examination Hearing sessions.

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

The Infrastructure Delivery Plan (IDP) Version 1, September 2016:
<http://www.eastherts.gov.uk/idp>

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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:	No
Legal:	There are no direct legal implications arising from this report.
Financial:	There are no direct financial implications arising from this report for the Council. The cost of preparing a District Plan is significant and has been budgeted over the duration of its preparation.
Human Resource:	Staff resource is in place to ensure the ongoing timely preparation of the District Plan.
Risk Management:	Without an Infrastructure Delivery Plan which identifies infrastructure needs, it is likely that the District Plan would be found 'unsound'.
Health and wellbeing – issues and impacts:	The 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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East Herts: Infrastructure Delivery Plan

2017



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Introduction:

- 1.1** An Infrastructure Delivery Plan (IDP) sets out the infrastructure needed to deliver planned growth sustainably, effectively and at the right time. In order to successfully deliver the identified level of growth across the District, new housing must be supported by improvements to existing infrastructure, and where necessary, creation of new infrastructure. This document reviews and outlines the infrastructure needed to support the growth and objectives set out in the East Herts District Plan.
- 1.2** This document pulls together information from key delivery partners, including developers and service providers and in doing-so identifies where infrastructure improvements or new schemes are needed. Alongside this, information on costs, funding and phasing is provided where it is currently available. This area of the IDP will be continually updated as is the expectation of IDP monitoring.

Structure of the IDP:

- 2.1** Version 2 of the IDP has been divided into 2 parts to assist the reader;
- 2.2** **Part 1:** Explains the context, expectations and different backgrounds to the provision of infrastructure. There are also summaries of how the different infrastructure areas are planned and managed by the various providers and how funding for infrastructure schemes are secured and applied.
- 2.3** **Part 2:** Provides information related to specific infrastructure requirements for each main settlement and strategic site.
- 2.4** A full list of known infrastructure schemes is included in the Appendices. Each settlement or development has a schedule of infrastructure schemes and this includes funding information and phasing where this is known.

PART 1:

The East Herts IDP 2017

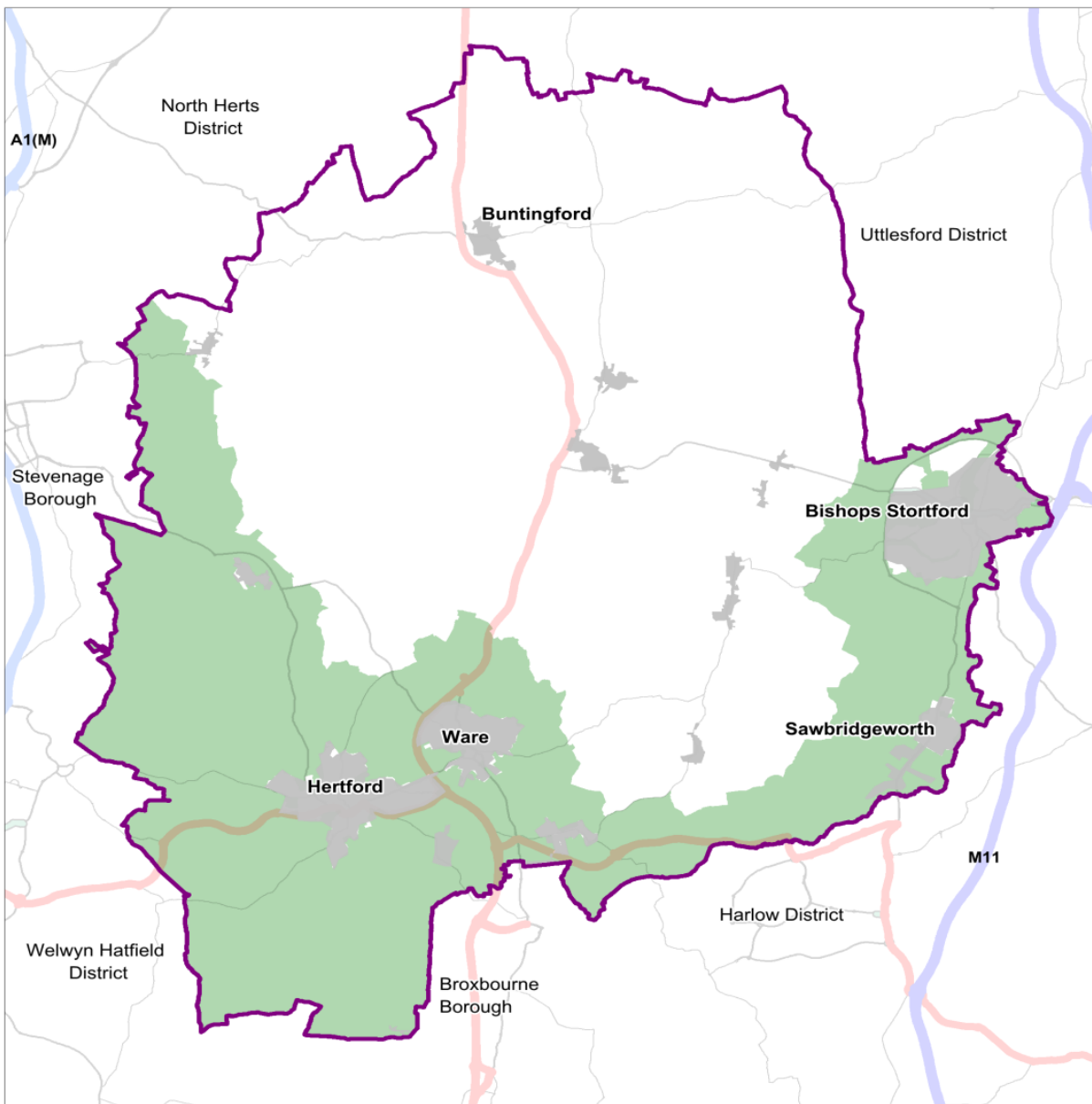


Figure 1: The East Herts District and Surrounding Area

Background to Version 2 of the IDP:

- 3.1** This document will replace and update Version 1 of the IDP which was published in September 2016. Version 1 set out an initial brief of the infrastructure schemes expected to supplement the level of growth indicated in the District Plan. In the period since Version 1's inception more information has become available and so this second iteration of the IDP provides a more comprehensive picture of the future of East Herts from an infrastructure perspective.

East Herts in Context

- 3.2** East Herts is predominantly a rural district comprising an area of 477 square kilometres (184 square miles) and covering approximately a third of the area of Hertfordshire. There are over 100 small villages and hamlets in the district in addition to the five historic market towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. These market towns provide a range of services to the nearby rural area. Approximately the southern third of the district lies within the London Metropolitan Green Belt, while the rest of the northern and central area lies within the Rural Area Beyond the Green Belt (Local Plan Policy GBC2).
- 3.3** The larger town centres are in Bishop's Stortford, Hertford and Ware, though the smaller settlements support a healthy number of shops and related services. The District is bordered by larger towns, with Stevenage and Welwyn Garden City to the west and Harlow to the south-east. **Figure 1** illustrates the main features of the District in its wider geographical context.
- 3.4** The district has good road and rail transport links and is well connected to the wider area. The A1M and M11 run close to the western and eastern boundaries of the district respectively. In addition, the M1 and M25 are located in close proximity to the district. Within the district, the A414 runs from west to east whilst the A10 cuts the district from north to south. The district benefits from two mainline rail links into London. Stansted Airport lies adjacent to the north-eastern boundary of the district within Uttlesford district. However, the location of Stansted Airport does have strategic implications for the district in terms of economic development; housing and aircraft generated noise pollution. The district's excellent transport links make it an attractive place to live and as such continue to create pressure for new development, particularly housing.

The East Herts Pre-Submission District Plan 2016

- 3.5** The East Herts Pre-Submission District Plan sets out the Council's planning framework for the District and identifies how East Herts will grow and develop during the plan period; 2011-2033. The document itself contains three parts; The Development Strategy; Development Management Policies; and Delivery and Monitoring.
- 3.6** The Development Strategy in the Pre-Submission Plan facilitates a spatial strategy for 18,040 new homes alongside further economic and retail growth. This level of growth will place additional demands on the existing infrastructure network and therefore infrastructure planning is an essential part of the Development Strategy. The IDP is designed to support the growth ambitions of the plan by identifying the specific needs of key sites and to support the overall strategic-level and pattern of growth outlined in the Development Strategy.
- 3.7** The plan, once adopted, will form the key part of the Development Plan for the District alongside the Minerals and Waste Local Plans for Hertfordshire and any adopted Neighbourhood Plans. The Development Plan is the basis upon which future planning applications will be determined.
- 3.8** The plan was published in November and a six-week consultation on the document took place between 3rd November and 15th December. The Council received just short of 4000 responses to the Pre-Submission consultation and anticipates that the plan and these comments will be submitted to the Secretary of State on the 31st March 2017, as stated in the Council's latest Local Development Scheme (LDS¹).

What the IDP Does Do

- 3.9** The IDP identifies infrastructure schemes which will be required in order to support identified growth. Such schemes include site specific infrastructure, settlement specific infrastructure and other schemes which are more strategic in nature and are required in order to help deliver growth across the wider sub-region.
- 3.10** The IDP seeks to present information on costs, funding and phasing where it is known. Some schemes will provide more information than others but in all cases, as schemes move further forward information becomes clearer and will be included within the IDP.

¹ <http://www.eastherts.gov.uk/lds>

What the IDP Does Not Do

- 3.11** In order to keep the schedule of infrastructure schemes manageable and focused, general on site costs associated with building works have not been identified. These include site preparation costs, connections to utilities, sustainable drainage and basic site access arrangements. These are considered to be general costs which are required as part of any development scheme and it is therefore unnecessary to identify them separately. Such costs have been considered through the Delivery Study ² which assessed the financial viability of development sites. In addition it is recognised that developments would be required to make financial contributions towards general infrastructure costs in accordance with the Council's Planning Obligations SPD and the Hertfordshire County Council Toolkit. These generic contributions have not been included within the IDP, unless a specific infrastructure scheme has been identified.
- 3.12** Infrastructure schemes associated with the Bishop's Stortford North site have not been included in the IDP as planning permission has been granted. As such, infrastructure requirements have been considered through the application process.

² <http://www.eastherts.gov.uk/deliverystudy>

Policy and Legislative Context:

3.13 The NPPF sets out the principle of achieving sustainable development. Paragraph 162 specifically deals with infrastructure stating that:

‘Local planning authorities should work with other authorities and providers to:

- *assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and*
- *take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.*

3.14 Paragraph 177 of the NPPF also sets out that infrastructure and development policies should be planned at the same time in a Local Plan to ensure there is a reasonable prospect that planned infrastructure is delivered in a timely manner.

3.15 The Government also published National Planning Practice Guidance (referred to as ‘the Guidance’). The Guidance states that:

‘The detail concerning planning infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.’

3.16 As such, Chapter 3 (Development Strategy) of the District Plan does identify the key strategic schemes that are required to deliver the strategy for the District. Certain schemes are also referenced in the relevant settlement specific chapters.

3.17 The NPPF also sets out a duty to cooperate (para. 179). This identifies that public bodies should work collaboratively across administrative boundaries to ensure infrastructure identified in the Local Plan is deliverable. The Council has worked closely with its neighbouring authorities and service providers throughout the Plan making process, and will continue to do so in order to finalise the IDP over the coming months.

3.18 Local Planning Authorities have only been required to prepare an IDP since the introduction of the NPPF. The IDP provides a mechanism that will enable the Council to closely monitor infrastructure provision. Therefore, the timely delivery of these schemes can be managed

more effectively than has been the case previously. Where issues are identified, suitable interventions can be made.

Planning for Infrastructure:

- 4.1** This section seeks to explain how key aspects of infrastructure are planned for by service providers. In particular, it focuses on how requirements for transport, education, healthcare facilities and water supply/disposal are determined.

Primary and Secondary Education

- 4.2** Hertfordshire County Council (HCC) is the local education authority and is subject to a number of statutory duties and responsibilities including:

- Promoting high standards of education;
- Planning and commissioning school places in its local authority area;
- Extending diversity and choice;
- Co-ordinating admissions in the normal admissions round for all maintained and some academy schools; and
- Resourcing the shared maintenance, improvement to, and provision of, the built school environment, and securing value for money.

- 4.3** HCC has a duty to secure sufficient school places in its area, ensuring that every child has access to a school place. HCC fulfils these planning responsibilities by forecasting the demand for school places in order to identify an appropriate balance between supply and demand. It negotiates the right number of places on an annual basis, whilst in parallel undertaking longer terms strategic planning.

Meeting the Demand

- 4.4** Hertfordshire has experienced a significant rise in the demand for primary places across the county in recent years in line with the picture nationally. The rise is not consistent across the county, with some areas experiencing substantial increases in the primary aged population, whilst in some more rural areas demand is less pressing or currently remains fairly static. More information on the rising demand is available through HCC's strategy document 'Meeting the Demand for School Places' available at:
<http://www.hertfordshire.gov.uk/mm/15529307/15744647/item3app1171209.pdf>

Forecasts

- 4.5** HCC produces regular pupil forecasts for both Reception and Year 7 demand. At a primary level, HCC publish forecasts four years ahead and secondary forecasts stretch to 10 years in the future.
- 4.6** These forecasts are based on actual data of 0-5 year olds in an area, historic pupil movement, as well as an assumed pupil yield from new housing developments. The secondary forecasts take account of an assumed housing growth trajectory for the longer term, based on information provided by District and Borough Councils.
- 4.7** Latest forecasts were provided to East Herts Council as part of HCC's response to the Pre-Submission District Plan. The forecasts project demand for admissions into Reception and Year 7 (or Reception, Year 5 and Year 9 in areas which operate a three tier system).

New Schools

- 4.8** The way in which new schools are set up has undergone significant change in recent years. The County Council's role as a commissioner of places is such that where it is considered there is a basic need for a new school it must:
- Seek proposals to establish an academy/free school; or (if unsuccessful)
 - Hold a statutory competition; or (if unsuccessful)
 - Publish its own proposals for a new maintained school.
- 4.9** The County Council remains responsible for providing the site and meeting all associated capital and pre/post opening costs, in instances where the new school provision is meeting basic need. Therefore, the County Council continues to hold the key role in negotiating S106 contributions for, and the provision of, all school infrastructure.

Principles

- 4.10** School provision is often described in terms of 'forms of entry'. 1 form of entry (FE) equals 30 places per year group.
- 4.11** Primary schools have seven year groups from Reception through to Year 6. HCC has a preference for primary schools of 2FE or more, as this larger size provides improved opportunities for delivery of a broad education curriculum and staff development, as well as offering the ability to better manage fluctuations in demand. A 2FE primary school will have 7 year groups of 60 pupils (420 in total), plus a Nursery class where offered.
- 4.12** Secondary schools have five year groups, from Year 7 through to Year 11. With few exceptions, the secondary schools within Hertfordshire operate sixth forms, providing lower and upper year's groups at Years 12 and 13. HCC has a preference for secondary schools of 6 to 10FE, again because this offers improved opportunities for delivery of a broad education

curriculum. A 6FE school will have 6 year groups of 180 pupils (1,080 in total) plus a Sixth Form.

- 4.13** When undertaking high level school place planning related to new residential development, HCC determines child yield based on a ratio of 1FE per 500 dwellings to be 97.5% confident of not underestimating yield.
- 4.14** This is based on a study of 49 Hertfordshire developments undertaken by HCC's demographer (c.2008). This work produced a yield range of 1FE per 500 dwellings (42 children per 100 dwellings/97.5% confidence) to 1FE per 850 dwellings (24.7 children per 100 dwellings/50% confidence). This position was confirmed by the County Council in a letter to the District and Borough Councils in April 2016.
- 4.15** The County Council applies the upper end of the range, 1FE per 500 dwellings, in the first instance to ensure prudent planning. When considering actual proposals or planning applications, the County Council uses specific development forecasting models to ascertain more tailored demographic profiles, including pupil yields.

Free Early Education and Childcare Provision and Children's Centres

- 4.16** Section 6 of the Childcare Act 2006 places a duty on all local authorities to secure sufficient childcare for working parents, or parent who are studying, or training for employment, for children aged 0 to 14 years (19 years for children with special educational needs and disabilities (SEND)). The County Council also has a statutory responsibility to provide universal Free Early Education (FEE) for 3 and 4 year olds. Since September 2013 HCC has had a statutory responsibility to provide 15 hours FEE to eligible vulnerable 2 year old children across Hertfordshire.
- 4.17** In September 2017 a new extended entitlement of an additional 15 hours free childcare will be introduced for working parents in Hertfordshire. HCC is currently working on the likely demand across Hertfordshire linked to the number of places available. Consequently demand for these services is forecast to increase, in addition to the increasing population of young children in the county. Provision for this new entitlement will be within schools preschools and day nurseries and childminders.
- 4.18** In addition to FEE places, HCC has a duty to ensure there are sufficient childcare places for 0 to 14 year old children (age 19 for children with SEND) in preschools, day nurseries and out

of school clubs, which can run either from school locations or other community facilities . The need for early years education can be met in various ways.

4.19 Maintained Nursery Schools are funded by the state where only children aged 3 and 4 receive their free early education entitlement before attending primary school. There are 15 such schools in Hertfordshire.

4.20 Maintained Nursery Classes are based in primary schools where children aged 3 and 4 receive their free early education entitlement until they move up to reception.

4.21 Preschool/Playgroup provision usually educates children between the ages of 2 years and school age. These settings are often able to offer free early education to eligible 2 year olds as well as all 3 and 4 year olds. These settings are run by Private, Voluntary and Independent (PVI) providers in local communities, and some children attending will be accessing their FEE place, while others will be accessing additional services for which parents pay. These settings will usually be set up in community buildings or schools and will usually be open term time only.

4.22 Day Nurseries offer childcare and early education for children from 0 to 5 years old. These settings are used predominately by working parents for childcare purposes. They also usually offer FEE for eligible children but with most children accessing additional services for which parents pay. This provision is market led.

Hertfordshire Sure Start Children's Centres

4.23 Legislation about Children's Centres is contained in the Childcare Act 2006. The Act places a duty on local authorities to improve the well-being of young children in their area and reduce inequalities between them. Specifically they must:

- ensure there are sufficient Children's Centres to meet local need
- ensure each Children's Centre is within the remit of an Advisory Board
- ensure there is consultation before any significant changes are made to Children's Centre provision in their area
- ensure that the local authority, local commissioners of health services and Jobcentre Plus jointly consider whether the early childhood services they provide should be provided through Children's Centres in the area
- ensure that after receiving a report from Ofsted following the inspection of a children's centre an Action plan is prepared and published.

4.24 The core purpose of Children's Centres, as defined by the Department for Education, is to improve outcomes for young children and their families, with a particular focus on those families in greatest need of support.

- Child development and school readiness - supporting personal, social and emotional development, physical development and communication and language from pre-birth to age 5, so children develop as confident and curious learners and are able to take full advantage of the learning opportunities presented to them in school.
- Parenting aspirations and parenting skills - building on strengths and supporting aspirations, so that parents and carers are able to give their child the best start in life.
- Child and family health and life chances - promoting good physical and mental health for both children and their family; safeguarding; supporting parents to improve the skills that enable them to access education, training and employment; and addressing risk factors so that children and their families are safe, free from poverty and able to improve both their immediate wellbeing and their future life chances.

Highways

4.25 Highways England operates, maintains and improves England's strategic road network (SRN) – the country's motorways and major A roads. Hertfordshire County Council (HCC) is the local Highways Authority and, as such, is responsible for all other adopted roads in the county.

4.26 From a transport perspective, HCC supports the local plan making process by undertaking strategic modelling work. The purpose of the modelling is to identify areas of the highway network that will come under stress as a result of planned growth. In doing so, required mitigation measures can be identified.

Paragraph 32 of the National Planning Policy Framework (NPPF) states that:

'Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'.

4.27 The NPPF is silent on what 'severe' might mean. However, it seems clear that a small to moderate increase in congestion, and therefore journey times, is likely to be considered acceptable in planning terms.

4.28 HCC has recently created a transport model known as COMET in order to assess the high level impacts of growth on the strategic network across Hertfordshire. In 2016, HCC published a '2050 Transport Vision' document for consultation which sought to identify strategic schemes that could be delivered up to 2050. The Vision goes beyond highways schemes and seeks to look at transport provision in a comprehensive manner. The Vision document will inform Local Transport Plan 4 (LTP4).

4.29 Essex County Council (ECC) has also produced a strategic transport model known as VISUM. This model is of relevance because it assesses impacts on the highway network, both within Essex and also the eastern section of East Herts District. Crucially, unlike COMET, it takes into account proposed growth within both administrative areas. Therefore, in terms of identifying capacity issues on that side of the District, VISUM is considered to be a more robust source of information.

4.30 Advice from the two County Councils, which has been based on the emerging results of the two strategic models, has been taken into account in preparing the District Plan. More information on this is provided within the settlement specific sections of this document.

4.31 In addition to COMET and VISUM, more detailed modelling has also taken place in respect of certain settlements and sites. Again this is further explained later in this document.

Rail

- 4.32** Network Rail is responsible for the maintenance and enhancement of the rail network. Upgrades to infrastructure are planned through 'Control Periods'. At present we are within Control Period 5 (CP5) which runs from 2014 through to 2019. A number of schemes are already planned for future Control Periods. The need for additional capacity on the West Anglia Line, which runs through East Herts, 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 Anglia Route Study, March 2016. This currently anticipates potential commencement within Control Period 6 (i.e. between 2019-2024).
- 4.33** Hertfordshire County Council has prepared a Rail Strategy which was published in July 2016. This document identifies the current challenges and future priorities with regards to the railways in Hertfordshire. The document can be viewed online here:
<http://www.hertfordshire.gov.uk/docs/pdf/r/HCCrailstratjuly16.pdf>

Buses

- 4.34** In a similar vein to the Rail Strategy, identified above, HCC has also published a Bus Strategy. Bus provision has been a particularly challenging area of transport provision in recent times, and in some areas services have been cut. New services can be provided as part of new developments, and in many cases, these services can be funded for an initial period by developers. Ultimately though, bus services need to be sustainable in terms of the number of passengers that use them.
- 4.35** The bus strategy sets out the challenges with service provision and identifies the priorities for investment and improvement. The document can be viewed here:
<http://www.hertfordshire.gov.uk/docs/pdf/b/busstrategy.pdf>

Open Space and Green Infrastructure

4.36 Open spaces and green infrastructure perform vital roles in terms of social cohesion and health and wellbeing.

4.37 The main types of open space are defined as follows:

- Parks and Gardens
- Natural and semi-natural open space: Open space that is not actively managed as amenity space and tends towards wilder land. Examples often include woodland, grasslands, watermeadow, commons, informal copses and, often, buffer land to roads and railways.
- Amenity Green Space: Typically formed of smaller pieces of open land, generally under one hectare, ordinarily grass. They are available for spontaneous and informal use and often have no specific function, and may or may not have trees and/or bushes.
- Children's play space / Children and young people: Unsupervised, equipped play space.
- Allotments: Council owned and managed areas where residents are able to rent space for growing their own produce.
- Outdoor sports pitches: primarily sites used for formal games (principally football, rugby and cricket) and include private sports clubs, school playing fields and municipal playing pitches.

4.38 All new development would be expected to deliver green spaces in some form on site. These might be small scale play areas or larger green spaces. For very large strategic developments, parklands and sports pitches will be provided. These schemes are planned for as part of the masterplanning/planning application process. However the framework for their delivery is established at the plan making stage.

4.39 The Council maintains a number of green spaces across the District. Two of the larger parks have received Green Flag status over recent years: Southern Country Park in Bishop's Stortford and the Ridgeway in Hertford.

4.40 HCC's Countryside Management Service oversees the delivery of green infrastructure schemes across the county. Information about these schemes has been incorporated within the IDP where relevant.

4.41 East Herts is currently undertaking an update to its Open Spaces and Sport Assessment which will advise on future requirements across the District. It is likely that this will be completed in Summer 2017, and as such the outcomes can be included in an updated IDP prior to Examination of the District Plan.

Health

- 4.42** In April 2013, under the terms of the Health and Social Care Act 2012, a reorganisation of the NHS took place regarding the administration of the NHS. Primary care trusts (PCTs) and strategic health authorities (SHAs) were abolished, and replaced by clinical commissioning groups (CCGs). CCGs now commission most of the hospital and community NHS services in the local areas for which they are responsible. Commissioning involves deciding what services a population is likely to need, and ensuring that there is provision of these services. The CCGs are overseen by NHS England, formally known as the NHS Commissioning Board which was established on 1 October 2012 as an executive non-departmental public body. NHS England also has the responsibility for commissioning primary care services - General Practitioners, opticians and NHS dentistry, as well as some specialised hospital services. Services commissioned include general practice physician services (most of whom are private businesses working under contract to the NHS), community nursing, local clinics and mental health services.
- 4.43** Local authorities have a wide range of duties and responsibilities regarding the health of their populations, which extend beyond the NHS into both public health and social care.
- 4.44** Every upper tier or unitary local authority in England must have a health and wellbeing board. The health and wellbeing board encourages work to improve local health and wellbeing outcomes, including (where appropriate) more joined up working across the NHS, public health, social care, and other services. The core membership of the health and wellbeing board includes commissioners from across the local authority – the director of public health, director of adult social services and director of children’s services – and representatives of all CCGs in the health and wellbeing board’s area.
- 4.45** Public Health England (PHE), an operationally independent executive agency of the Department of Health, supports local authorities in their duty to improve public health and has national responsibility for protecting the public against major health risks.
- 4.46** The local CCG for this District is the East and North Hertfordshire CCG. At this stage it has not been possible to include much information within the IDP with regards to infrastructure requirements relating to health. However, Officers are working closely with the CCG and NHS England in order to ascertain what schemes are required as a result of planned growth and how they would be delivered. This is particularly important given that a number of GP surgeries across the District are at capacity or are constrained. When this information becomes available, the IDP will be updated. This will occur prior to the Examination of the District Plan.

4.47 The current constraints relating to Princess Alexandra Hospital in Harlow are well known. The current hospital buildings are not considered to be fit for purpose in the long term and the existing site is very constrained. The preferred solution of the Hospital Trust is to relocate the hospital to a new site on the periphery of Harlow. As such, the hospital has engaged with East Herts, Harlow and Epping Forest Councils through the Co-operation for Sustainable Development Board in order to consider the potential for relocation. At present, the hospital is preparing a Strategic Outline Case to submit to Government in order to secure funding for a new hospital. This work will also be looked at in the context of the Harlow and Gilston Garden Town proposal that was supported by Government in January 2017.

Water Supply

4.48 There are two companies that are responsible for water supply in East Herts: Thames Water and Affinity Water. The water companies have a statutory duty to provide water to households. Each company prepares a Water Resources Management Plan that identifies what the demand will be over the period covered by the Plan, and also how this demand will be met. This is particularly important in water stressed areas such as the South East.

4.49 There are a number of ways in which water supply can be managed in order to ensure that new developments can be serviced. The main methods are:

- Repairs to the existing infrastructure. This involves investing in improvements to mains pipe work in order to reduce leakage.
- Progressive Metering. Introducing water meters is an effective way of reducing water use as consumers become more aware of the amount of water that they are using.
- Enhanced Water Efficiency. New technologies and household fittings can be included within new developments in order to reduce usage. This may include measures such as low-flush toilets and tap fittings. The District Plan includes a policy which seeks to reduce water consumption to 110 litres per person, per day.
- Water Transfers. It is common for companies, particularly those in water stressed areas, to transfer water resource from other water companies across the country in order to ensure a continuous supply. Increasing the volumes of water traded between organisations is a key Government initiative, designed to increase flexibility in supply systems and the efficiency with which available resources are used.

4.50 The current respective Water Resources Management Plans can be viewed online:

Thames Water: <https://corporate.thameswater.co.uk/about-us/our-strategies-and-plans/water-resources/our-current-plan-wrmp14>

Affinity Water: <https://stakeholder.affinitywater.co.uk/docs/FINAL-WRMP-Jun-2014.pdf>

Wastewater Treatment

- 4.51** Thames Water is responsible for wastewater treatment across the whole of East Herts. There are a number of local sewage treatment works which Thames Water maintains. However, the main strategic facility serving the District is Rye Meads Wastewater Treatment Works.
- 4.52** Rye Meads was built in the 1960's to serve the new towns of Stevenage and Harlow. It currently treats a population equivalent of 410,000. The works consists of primary sedimentation, activated sludge and secondary sedimentation processes. Effluent is passed through eight tertiary lagoons prior to discharge to the Toll House Stream which, within a short distance, joins the River Stort.
- 4.53** In recent years, there has been significant investment at Rye Meads in order to increase capacity and efficiency, as well as meeting new discharge consents which are governed by the Environment Agency. Further upgrade works, due for completion in 2018, will increase capacity to a population equivalent of 447,000.
- 4.54** Based on Thames Water's current growth forecasts, their high level assessment indicates that they currently expect the site to have headroom until 2024. This is a worst case scenario and this high level assessment is based on Thames Water's latest understanding of housing requirements. This is subject to change over time as more information becomes available regarding development within the Rye Meads catchment and is dependent on factors such as approved local plans, timing of planning permissions, phasing and final timing of development.
- 4.55** Thames Water will plan for future upgrades to Rye Meads, working with the Environment Agency and local authorities as required, in order to cater for further growth beyond 2024.

Libraries and other Community Facilities

- 4.56** Each of the five main towns in the District are served by library facilities. HCC is responsible for planning library services and set out the requirements for enhancements to service provision.
- 4.57** There are a number of other community facilities across the District which perform important roles, including village halls and community centres. These are often managed at the local level by Town and Parish Councils.

Infrastructure Funding:

- 5.1** Infrastructure schemes can be funded in a variety of ways. Where funding sources for specific schemes are known, these are reflected within the IDP. However, it should be recognised that the Council is still in the plan-making process, and therefore funding may not necessarily be agreed until post adoption of the District Plan during the planning application process. This section does not present a definitive list of funding sources, but does provide an indication of the way in which infrastructure schemes can be financed.
- 5.2** On large sites, such as the Gilston Area and East of Welwyn Garden City among others, developers will often be required to deliver infrastructure on site in order to serve that development. The developers will fund the complete cost of infrastructure as part of the overall development scheme. The identification, delivery and phasing of these schemes are included within Section 106 agreements at the time planning permission is given. Section 106 agreements are legally binding and therefore any given development must be built out in conformity with the requirements set out within the agreement. This provides certainty to the developers, local authority, service providers and the public in terms of what will be provided.
- 5.3** On occasion, a particular development might help provide for a specific piece of on-site infrastructure without financing the whole scheme itself. For example, a developer might provide land for a new school and only provide part of the finance, again through a Section 106 agreement, to deliver the buildings. This would be the case where the school is required to serve the needs of the wider area, not just those emanating from the development itself. In this instance, other developments in the local area would also be expected to make financial contributions towards the delivery of the school.
- 5.4** Financial contributions secured through Section 106 agreements are one of the main methods of financing infrastructure. At this stage of plan making it is difficult to identify the level of funding that may be secured through this mechanism. This is because Section 106 agreements are negotiable on a case by case basis, and therefore they would not be agreed until the planning application stage. In addition, payments vary depending on the number, size and tenure of houses and this information would not normally be known until later in the planning process. Nevertheless, both East Herts and HCC have online calculators which provide a starting point for negotiation. The payments required cover a number of different areas including education, healthcare and transport.
- 5.5** More information on Section 106 agreements can be found here:
<http://www.eastherts.gov.uk/article/24676/Adopted-Planning-Obligations-SPD>

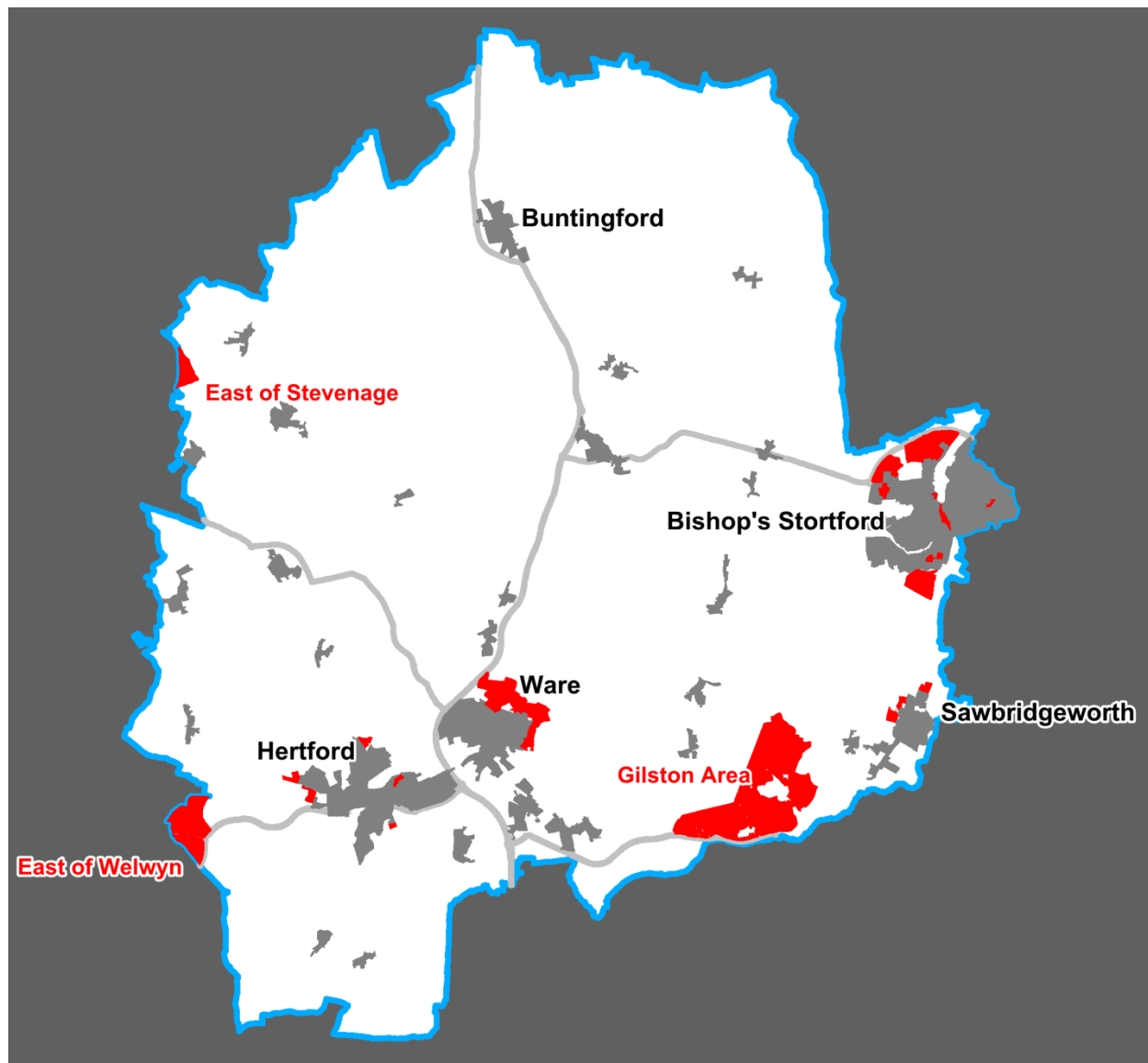
- 5.6** Beyond Section 106 payments, there are a number of other ways of delivering infrastructure. The Hertfordshire Local Enterprise Partnership (LEP) is one of 38 such bodies set up across the country in order to drive forward job and growth creation. The Hertfordshire LEP was first set up in 2010 and was recognised by Government in 2012. LEPs bid for funding, known as the Growth Deal, through a competitive process. The period of funding runs from 2015/2016 to 2020/21. To date the Hertfordshire LEP has secured a £221.5 million Growth Deal, with a further round of Growth Deal funding allocation anticipated for funding projects from 2017/18. Hertfordshire has also secured just over £60 million from the European Structural and Investment Funds, for investment into projects from 2015 onwards. In addition to Growth Deal and EU funding, the LEP has also been allocated £16.2 million Growing Places Fund, a loan scheme to unlock developments and enable the delivery of new jobs, commercial space and homes.
- 5.7** The Council can liaise with the LEP in order to seek funding for infrastructure schemes that would unlock growth. For example, the LEP is providing a significant proportion of funding for the Little Hadham bypass. As well funding infrastructure directly, the LEP can also 'forward fund' schemes in the form of a loan in order to deliver infrastructure at an earlier stage. The loan would then be paid back at a later date through Section 106 agreements as development comes forward.
- 5.8** Other forms of national funding are also available. In terms of strategic highways schemes, such as those involving the M11 junctions, Essex and Hertfordshire County Councils are able to bid for Road Investment Strategy (RIS) funding. RIS 1 funding, which was announced by Government in December 2014, covered investment in England's motorways and major roads (the 'strategic road network') during the 2015 to 2020 period. It provided £15.2 billion of investment in over 100 major schemes. Of importance to East Herts was a commitment to provide £34 million towards upgrading Junction 7 of the M11. It has since been agreed by Government that this funding should be transferred to the provision of a new Junction 7a instead. The identification of schemes for the second phase of funding, RIS 2, is currently underway.
- 5.9** Other forms of national funding for strategic highways schemes include the Strategic Roads Pinch Point Fund. This funding of £220 million has been identified to improve congestion hotspots on the strategic road network managed by Highways England. Within its Autumn Statement in 2016, the Government also announced an additional £1.1 billion to be allocated for local highway improvements which will reduce congestion at key locations, upgrade or improve the maintenance of local highway assets across the country, or unlock economic and job creation opportunities.
- 5.10** Service providers often also provide direct funding for infrastructure. For instance statutory providers such as utilities companies have a legal obligation to provide services to new developments. For instance Thames Water, which is responsible for wastewater treatment in East Herts, has a legal obligation to invest in its infrastructure in order cater for growth.

Hertfordshire County Council may also provide funding for certain schemes, and in particular can help 'forward fund' projects such as expansions to primary schools.

- 5.11** Finally, of significance to East Herts is a £2.3 billion Housing Infrastructure Fund that was also announced within the Autumn Statement. The funding pot will be used to help deliver up to 100,000 new homes in areas where they are needed most. The Council could apply for this funding in relation to strategic infrastructure schemes.
- 5.12** When identifying these large national funding sources, it is also important to consider the recent Harlow and Gilston Garden Town bid that was supported by Government in January 2017. While the successful bid does not guarantee access to national funding, it does raise the profile of development in that location, and as such required schemes are more likely to benefit from Government funding than would have been the case had the Garden Town bid not succeeded.
- 5.13** The IDP will be updated as and when more detail becomes available with regards to infrastructure funding.

PART 2:

Infrastructure by Settlement and Development



Bishops Stortford

Introduction:

6.1 Bishop's Stortford is the largest town within East Herts, the development strategy sets out plans for the town to accommodate approximately 4,000 dwellings. This includes the largest site to the north of the town which was initially identified for development within the adopted Local Plan (2007) and has since been granted planning permission for 2,529 homes. Other sites proposed for Bishop's Stortford include:

- Bishop's Stortford South – 750 homes
- Bishop's Stortford High School Site – 150 homes
- East of Manor Links – 50 homes
- Reserve Secondary School Site, Hadham Road – 163 homes
- The Causeway/Old River Lane – 100 homes
- The Goods Yard – 400 homes

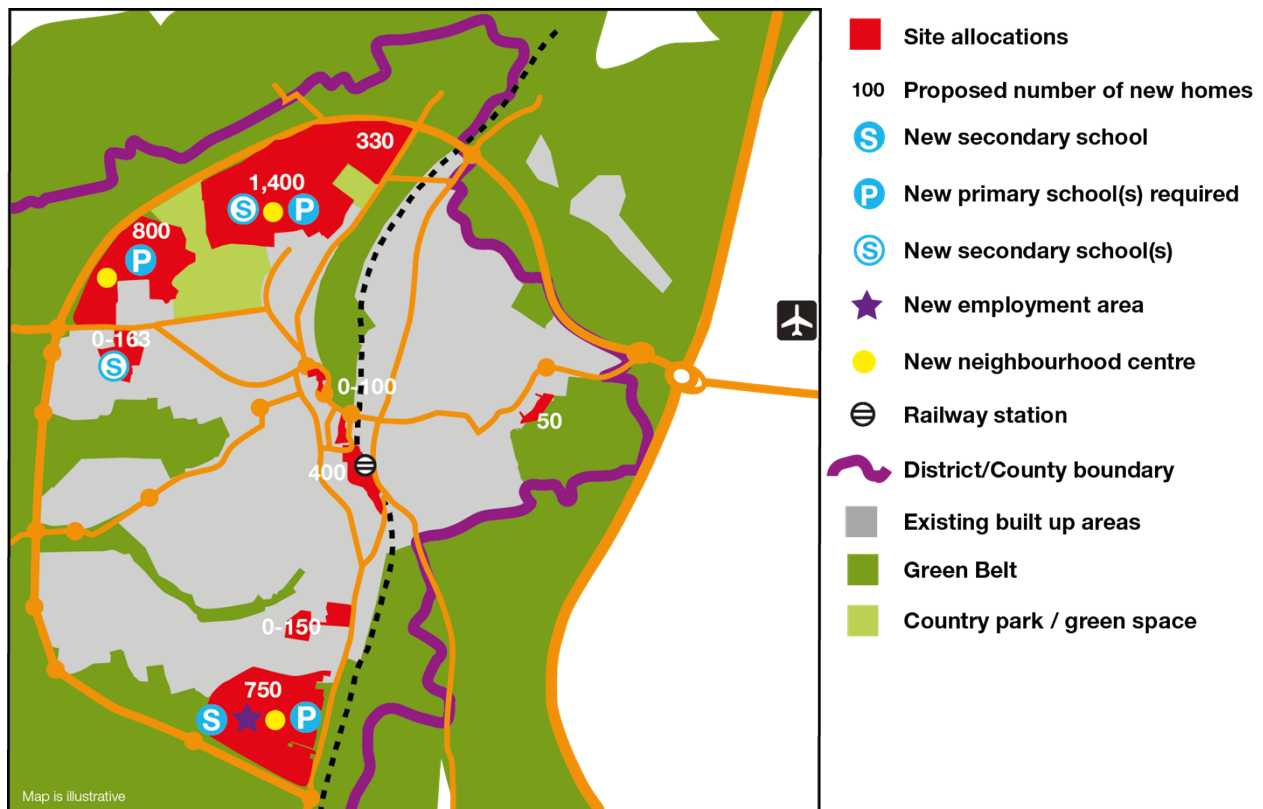
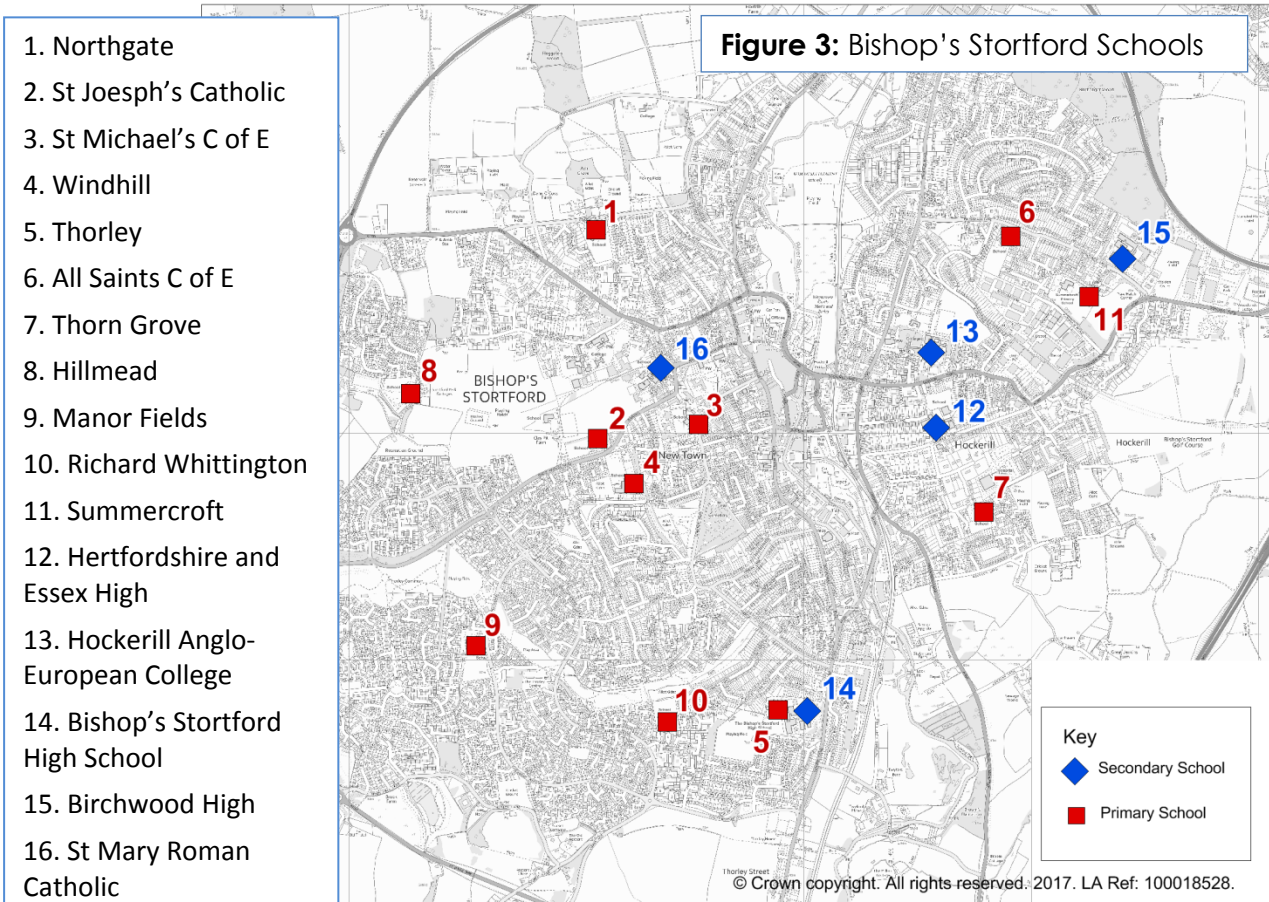


Figure 2: Bishop's Stortford Key Diagram

Education in Bishop's Stortford:

6.2 Bishop's Stortford has 11 Primary Schools across the town. The existing schools are either full or nearing full capacity. The town, which has 5 Secondary schools, is located within the same education planning area as Sawbridgeworth and therefore includes Leventhorpe Secondary School in Sawbridgeworth.



Education Requirements:

6.3 Primary: If all allocations are built-out then the total increase in dwellings will be 4,142 for Bishop's Stortford. This would result in a demand for 8.3FE of primary school places. As mentioned above, all existing primary schools are at or near capacity and therefore new or expanded schools will be required.

6.4 Secondary: Taking account of proposed development in Sawbridgeworth of 500 homes, the resulting demand across the education planning area is for 9.3FE of additional capacity.

Education Delivery:

- 6.5 Primary:** The site to the north of the town has received planning permission. Development will include the provision of 3 new primary schools with a total capacity of 5FE (2 x 2FE and 1 x 1FE). In addition, Bishop's Stortford South will deliver a 2FE school. Finally, the re-development of the existing Bishop's Stortford High School Site will allow the expansion of Thorley Hill Primary School by 1FE. This gives a total additional provision of 8FE in Bishop's Stortford.
- 6.6 Secondary:** The permitted development to the north of the town includes a 6FE secondary school. The Bishop's Stortford South development includes land for a 6FE secondary school that can be expanded to 8FE when there is demand. In addition, Leventhorpe School is currently considering expansion by 2FE. Taking into consideration the loss in terms of re-location of Bishop's Stortford High School (a 5.6FE facility), the result is a net gain of 10.4FE. HCC has also advised that through high level feasibility work, there is potential for 4FE of expansion within the existing school estate in the town. However, this is dependent on more detailed work and also reaching agreement with those schools as they are their own admitting authorities.

Education Funding:

- 6.7 Primary:** The two 2FE primary schools at Bishop's Stortford North will be fully funded by the developers. The third 1FE school will be partially funded by the developer with the remainder coming from Section 106 agreements from other developments in the town. The 1FE expansion of Thorley Hill primary will also be delivered through Section 106 agreements, while the 2FE school at Bishop's Stortford South will be funded directly by the developers.
- 6.8 Secondary:** The 6FE school at Bishop's Stortford North will be delivered by the developers. The 6FE school to the south will be funded by Section 106 contributions plus potentially some of the profit made by the County Council with regards to re-developing the existing High School site. Leventhorpe School is currently exploring various options with regards to funding as well as partly funding the development itself.

Transport Infrastructure:

- 6.9** Bishop's Stortford is well located to the existing highway network, particularly the A120 and M11. The A120 has capacity issues, particularly the B1383 Birchanger junction, while Junction 8 of the M11 will also reach capacity in the near future. A number of locations

within the town also currently experience congestion, including the Hockerill Junction near the town centre. The Bishop's Stortford Town Centre Planning Framework contains suggestions to rationalise traffic flows in the town centre and also to encourage walking and cycling.

Highways Infrastructure:

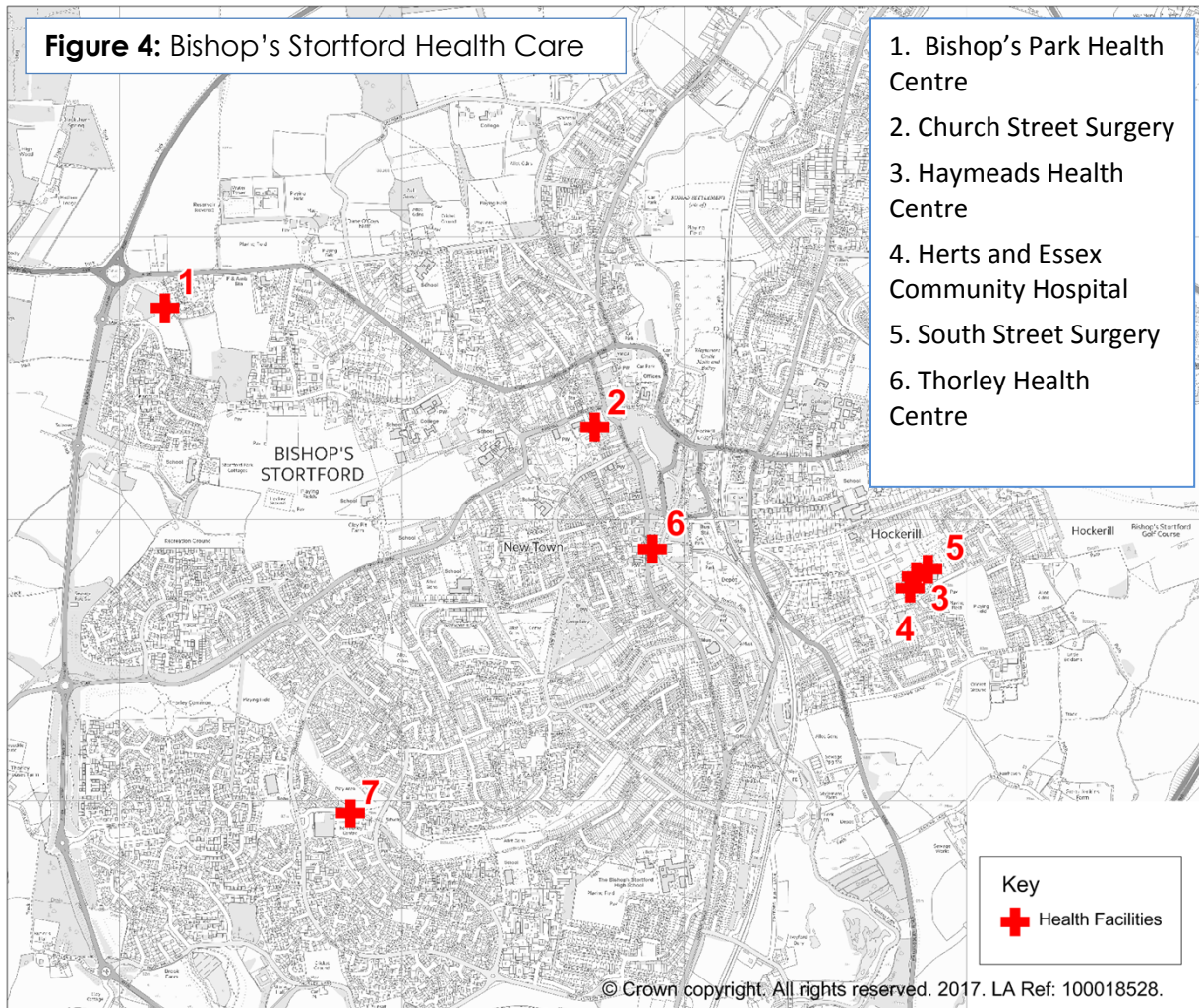
- 6.10** Essex County Council has identified two solutions to capacity issues at Junction 8 of the M11. The first is an interim solution that would provide extra capacity for a number of years. The proposals would cost in the region of £13 million.
- 6.11** The second would involve more significant works and can take place following the interim solution. At present, the likely cost is unknown.
- 6.12** The provision of a Little Hadham bypass is also of relevance to residents of Bishop's Stortford. This scheme will cost in the region of £30 million and is largely being funded by the Hertfordshire LEP (£27.4 million), with further funding being provided by the Environment Agency for a flood alleviation scheme. It is anticipated that the scheme will be delivered by 2020.
- 6.13** Other works in Bishop's Stortford involve the creation of suitable access points for the various development sites.
- 6.14** In addition, to highways measures, provision will be made for new bus services and walking and cycling.

Highways Funding:

- 6.15** The interim solution for Junction 8 has attracted £1 million of funding from the Greater Cambridge/Greater Peterborough LEP. Essex County Council has also bid for Road Investment Strategy 2 funding as well as money from the Growth and South East LEP (Local Growth Fund Round 3).
- 6.16** As noted above, the Little Hadham bypass is funded. Works required for site access will be delivered by the developers of the respective sites.

Health Care:

- 6.17** Bishop's Stortford has 7 full-time GP surgeries which are shown on the plan below. In addition, the Herts and Essex Community Hospital provides a range of services for the local community.



Healthcare Requirements:

- 6.18** The Council is currently waiting for further information from the CCG and NHS England with regards to the potential need to expand existing health facilities in the town. Further information will therefore be provided through a review of the IDP. However, health facilities have been secured as part of the planning permission at Bishop's Stortford North, while a facility will also be provided within Bishop's Stortford South.

Healthcare Funding:

- 6.19** All developments in Bishop's Stortford will be expected to make suitable financial contributions to healthcare. These contributions would be negotiated at the planning application stage through Section 106 agreements.

Open Space and Green Infrastructure

- 6.20** The planning permission at Bishop's Stortford North includes provision for a substantial amount of open space and green infrastructure. In particular, a new Country Park will be provided on land to the north and south of Dane O'Coy's Road, including Hoggate's Wood and Ash Grove. The development will also provide a range of other open spaces including sports pitches and play areas.
- 6.21** All other proposed sites in the town will provide a range of open space provision commensurate to the size of the respective developments. It is currently intended that the playing pitches associated with the Hadham Road site and the existing Bishop's Stortford High School site be maintained.

Buntingford

Introduction:

- 7.1** Buntingford's development strategy differs from the other towns within East Herts, due to a number of planning applications that have received permission prior to the adoption of the District Plan. Buntingford will see approximately 1,100 new dwellings built across a number of sites and therefore the development strategy is focussed upon mitigating and managing the impacts of this level of development.

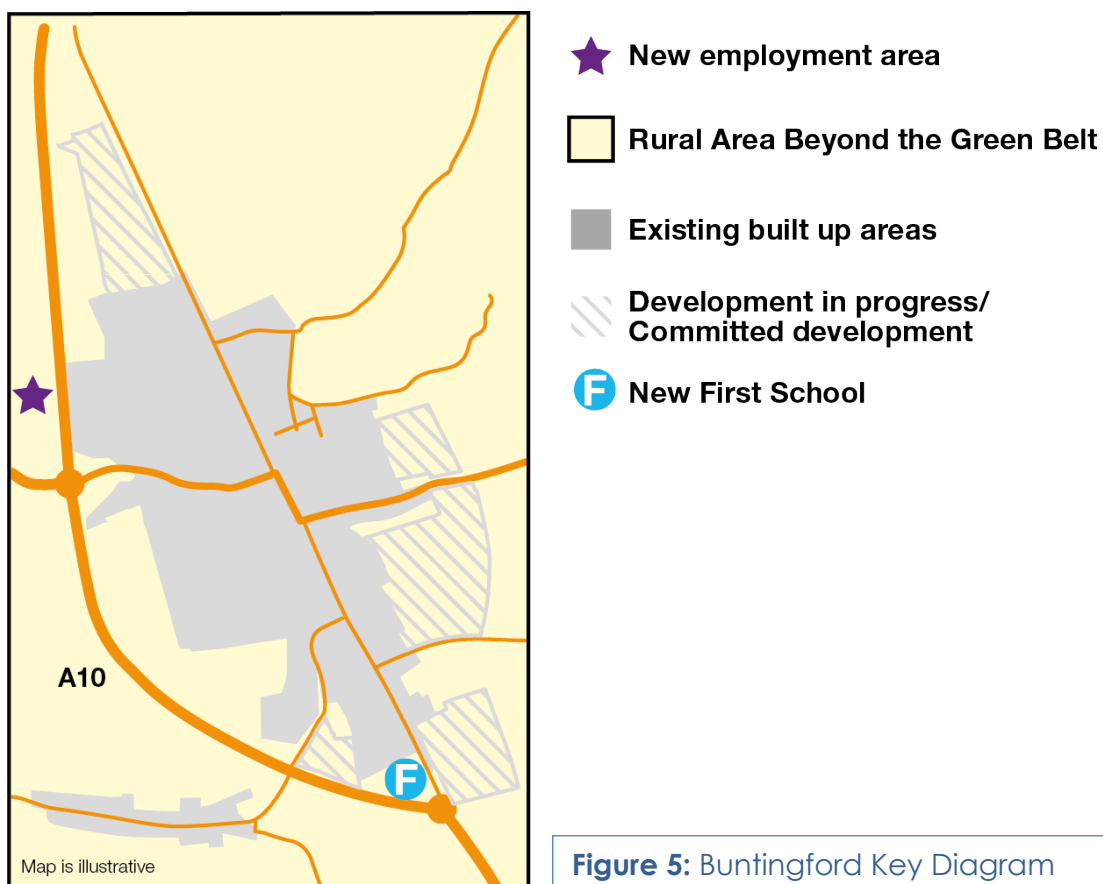
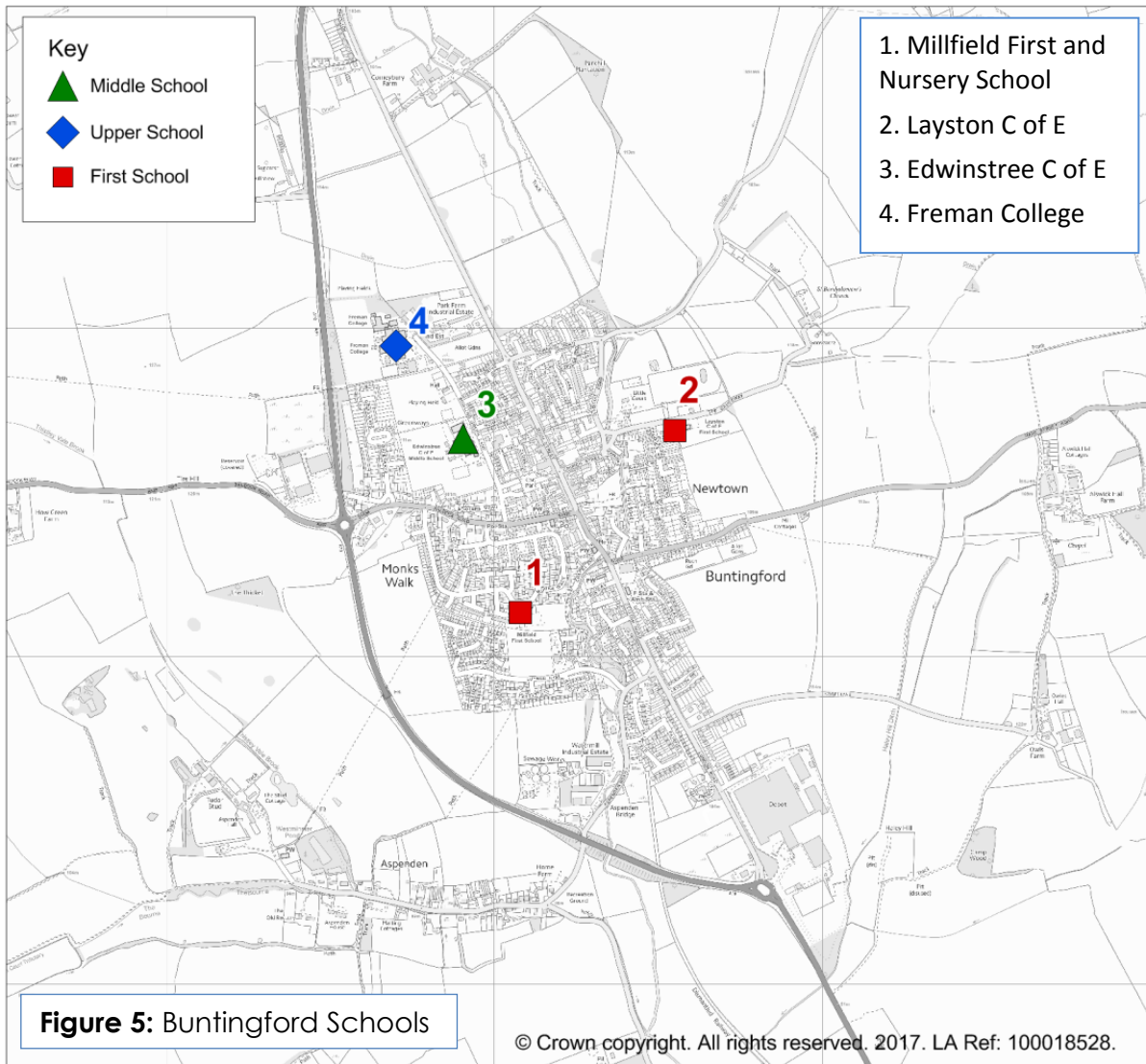


Figure 5: Buntingford Key Diagram

Education in Buntingford:

- 7.2** The town and surrounding area are served by a three tier education system. There are two First schools; Millfield First and Nursery School and Layston C of E First School. Edwinstree C of E provides middle school education (years 5 to 8) and Freman College providing upper

level education (years 9 to 11 and sixth form). Ralph Sadler is a middle school that services the Buntingford school planning area but is situated outside of Buntingford in the village of Puckeridge.



Education Requirements:

- 7.3 First Schools:** To meet the demand arising from the planned developments in Buntingford a new First School must be opened by September 2019. Policy BUNT2 within the Pre-Submission District Plan identifies land west of London Road for a 2FE First School. HCC is currently undertaking a further options appraisal comparing potential first school sites.
- 7.4** In addition, HCC is currently consulting on proposals to expand Millfield First School by 0.5FE from September 2018.

7.5 Middle Schools: Edwinstree C of E and Ralph Sadler have sufficient school places in the short-term to accommodate the increase from the development. HCC feel that adding more places at this time would be likely to draw more pupils from communities outside the planning area.

7.6 Upper level: Education at the upper level can be enhanced via the expansion of Freman College within the Plan period, if there is a need to do so.

Education Delivery:

7.7 As noted earlier, Buntingford has had a number of developments approved in recent times. Each development has contributed towards education needs in the form of a Section 106 agreement. With regards to delivery of the First School, HCC consider that enough money has been collected through the Section 106 process in order to purchase the necessary land. HCC is considering how funding can be secured for the remainder of the cost. This could involve applying to the Department for Education for example.

Transport Infrastructure:

7.8 Buntingford is the only town within East Herts that doesn't have a railway station but does have good access to the A10 which runs to the west of the town.

Highways Infrastructure

7.9 There are two main highways schemes identified to improve the capacity of the A10 around Buntingford. Firstly, enhancements to the A10/London Road roundabout to the south of the town will be delivered in order to improve traffic flow in that location.

7.10 Secondly, dualling of the A10 south of Buntingford would also be beneficial in transport terms.

Highways Funding

7.11 The Hertfordshire Local Enterprise Partnership (LEP) has recently confirmed that it will provide £1.96 million of funding to deliver the required upgrades to the A10/London Road roundabout.

7.12 It is not yet clear how much dualling of the A10 would cost, and there is not yet any funding secured for this scheme. The Council will continue to work with HCC in this regard and any updates will be reflected in the IDP in due course.

Health Care:

7.13 Buntingford has two full-time GP surgeries which are shown on the plan below. As explained above, the situation in Buntingford is different from other settlements in that development has already received permission.

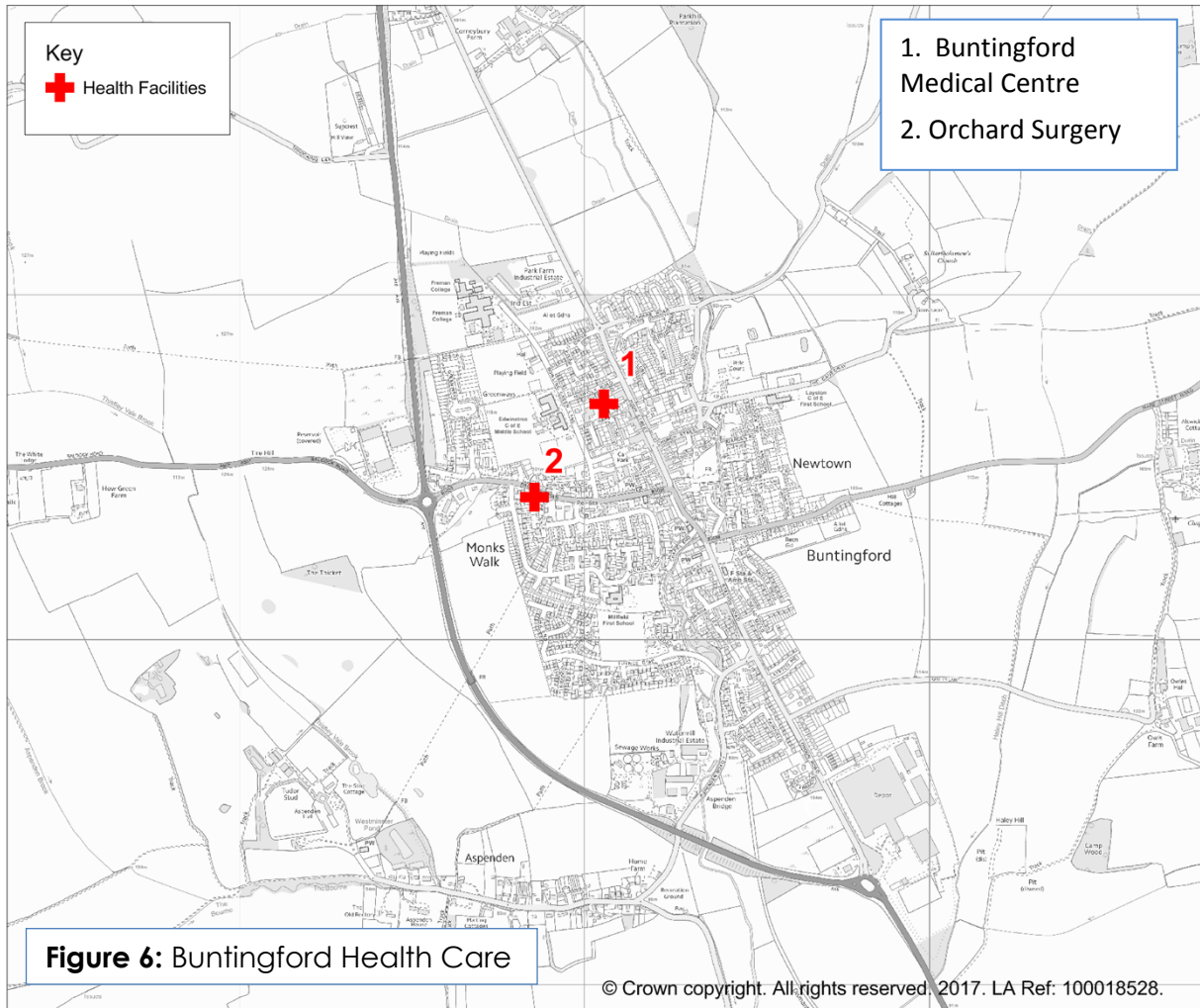


Figure 6: Buntingford Health Care

Healthcare Requirements:

7.14 The Council is currently waiting for further information from the CCG and NHS England with regards to the potential need to expand existing health facilities in the town. Further information will therefore be provided through a review of the IDP. Each of the developments that have received permission in Buntingford have made financial contributions towards healthcare in the town.

Hertford

Introduction:

8.1 The development strategy for Hertford states that the town will accommodate approximately 950 dwellings spread over 5 separate site allocations:

- West of Hertford (Welwyn Road) – 300 homes
- West of Hertford (Thieves Lane) – 250 homes
- Mead Lane Area – 200 homes
- North of Hertford – 150 homes
- South of Hertford – 50 homes

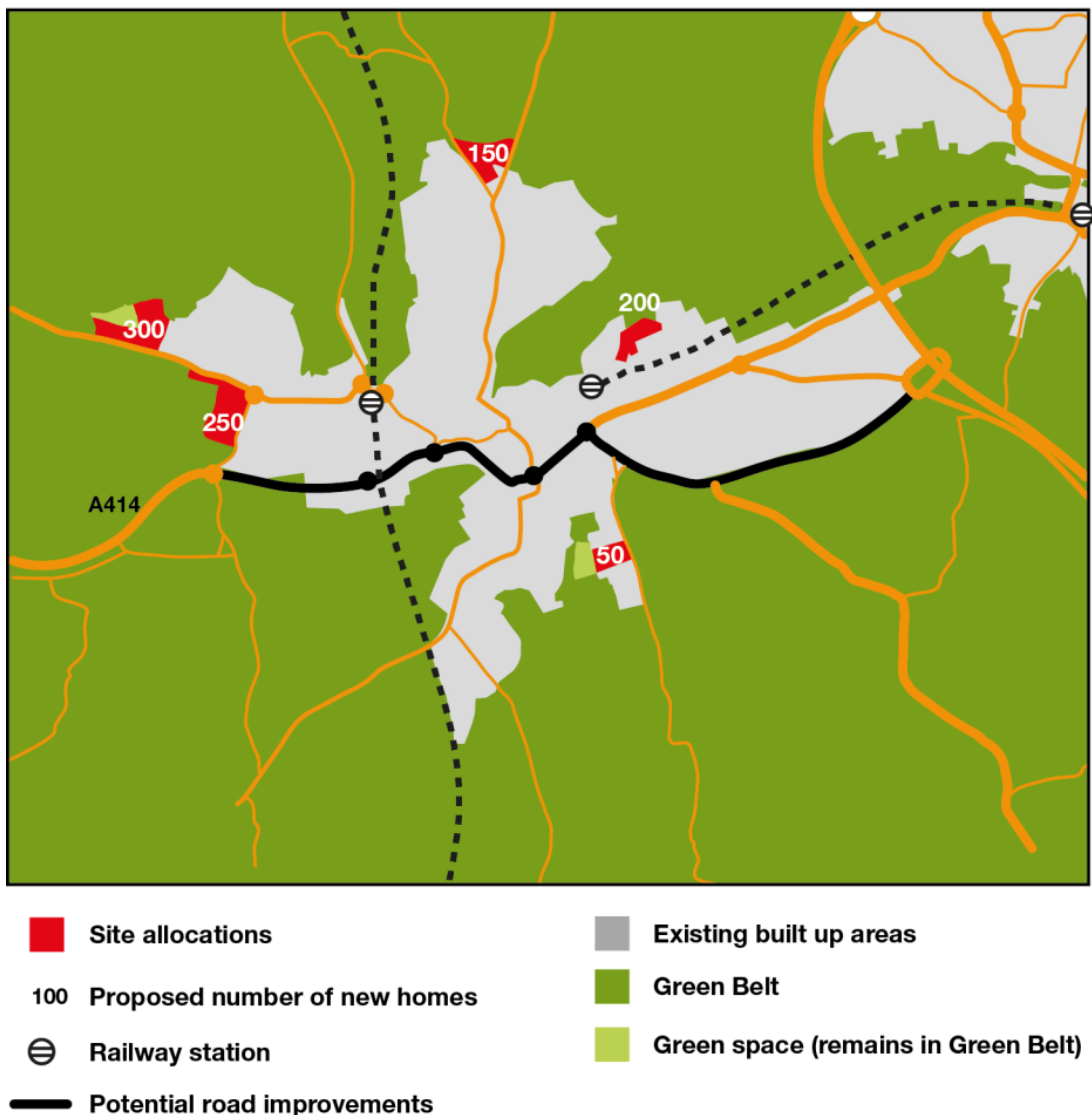
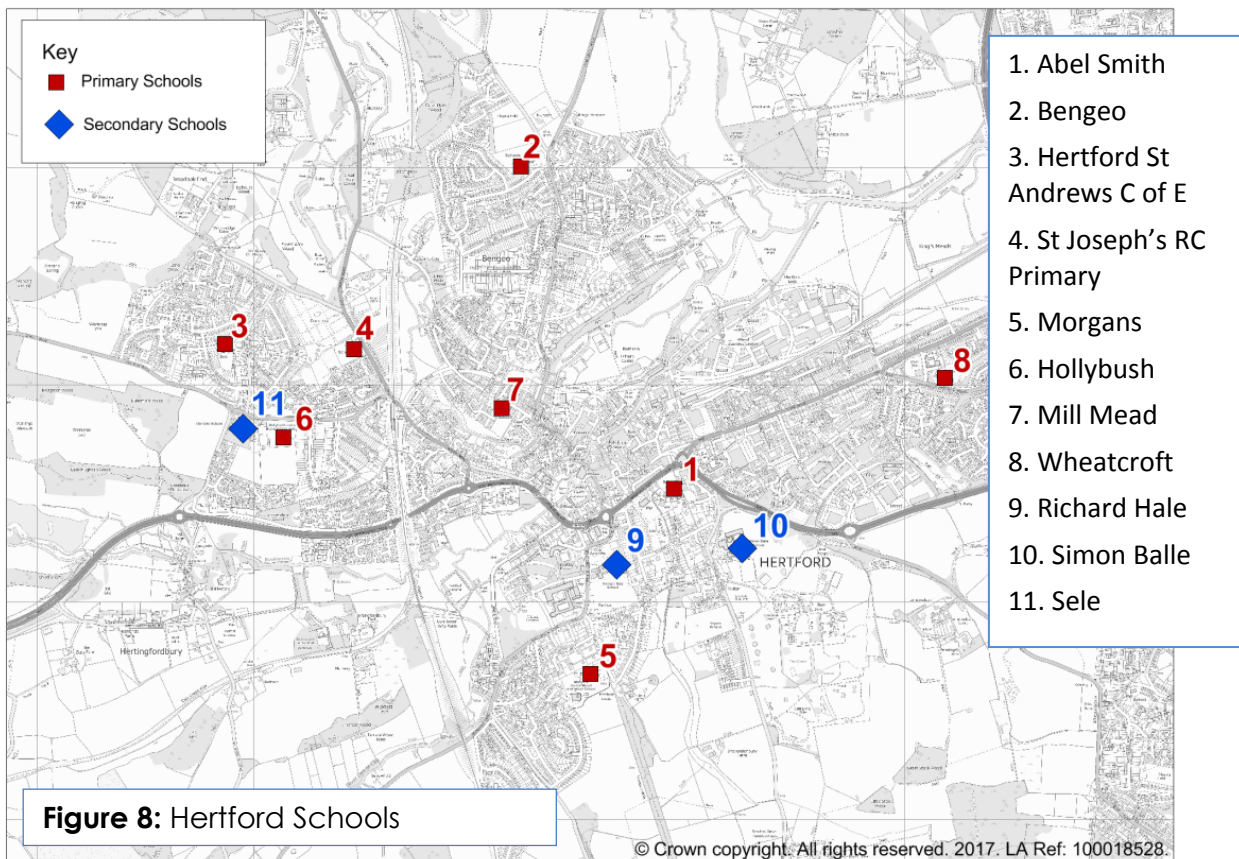


Figure 7: Hertford Key Diagram

Education in Hertford:

8.2 Hertford currently has nine Primary Schools and three Secondary Schools. Hertford experienced recent pressure on primary places and Simon Balle School was expanded in 2015 to include primary facilities, thereby becoming an all-through school. In terms of Secondary school provision, Hertford and Ware operate as one Education Planning Area and therefore includes a further two secondary schools in Ware.



Education Requirements:

8.3 Primary: The total accumulated development within Hertford results in 950 dwellings; this would produce an increased demand of around 2.0FE, whilst there is some capacity in existing primary schools there is not a sufficient enough level to meet the anticipated growth.

8.4 Secondary: Secondary education considers housing allocations in Hertford as well as Ware due to the shared Education Planning Area. Both settlements together will be delivering 2450 dwellings (Hertford; 950) which equates to a need of 5FE.

Education Delivery:

- 8.5 Primary:** Expansion of Hollybush Primary School would provide a further 1FE of primary education; this, along with capacity in the current schools will provide for the level of anticipated growth in the Hertford area.
- 8.6 Secondary:** Existing secondary schools in the Hertford and Ware area could be expanded to deliver new capacity. However, the preferred approach of HCC is to provide a new secondary school within the North and East of Ware development. This is explained further in the Ware section below.

Education Funding:

- 8.7** At primary level, the developers of the two West of Hertford sites will provide sufficient funding to deliver the expansion of Hollybush Primary School.
- 8.8** In relation to the secondary school, the North and East of Ware development will contribute an amount that is commensurate with the level of development proposed (3FE of provision). The remainder will come forward using contributions from other developments. In this case, the 5 site allocations coming forward within Hertford will be contributing towards the development of the secondary school along with any other windfall developments in the area. At present, the number of financial contributions that can be 'pooled' to pay for individual infrastructure schemes is limited to five. However, within the Housing White Paper, the Government has committed to reviewing the existing Section 106 regime. In addition, it is possible to split a scheme into smaller projects. For instance for a new secondary school, a specific project could be the provision for Sixth Form education or the delivery of sports pitches.

Transport Infrastructure:

- 8.9** Hertford has good transport connections, including a bus station and two rail stations that provide links to London and the wider area. Despite this Hertford suffers from traffic congestion at peak times focussed on the A414 running centrally through the town. Because of this it is important that future development doesn't exacerbate these problems.

Highways Infrastructure:

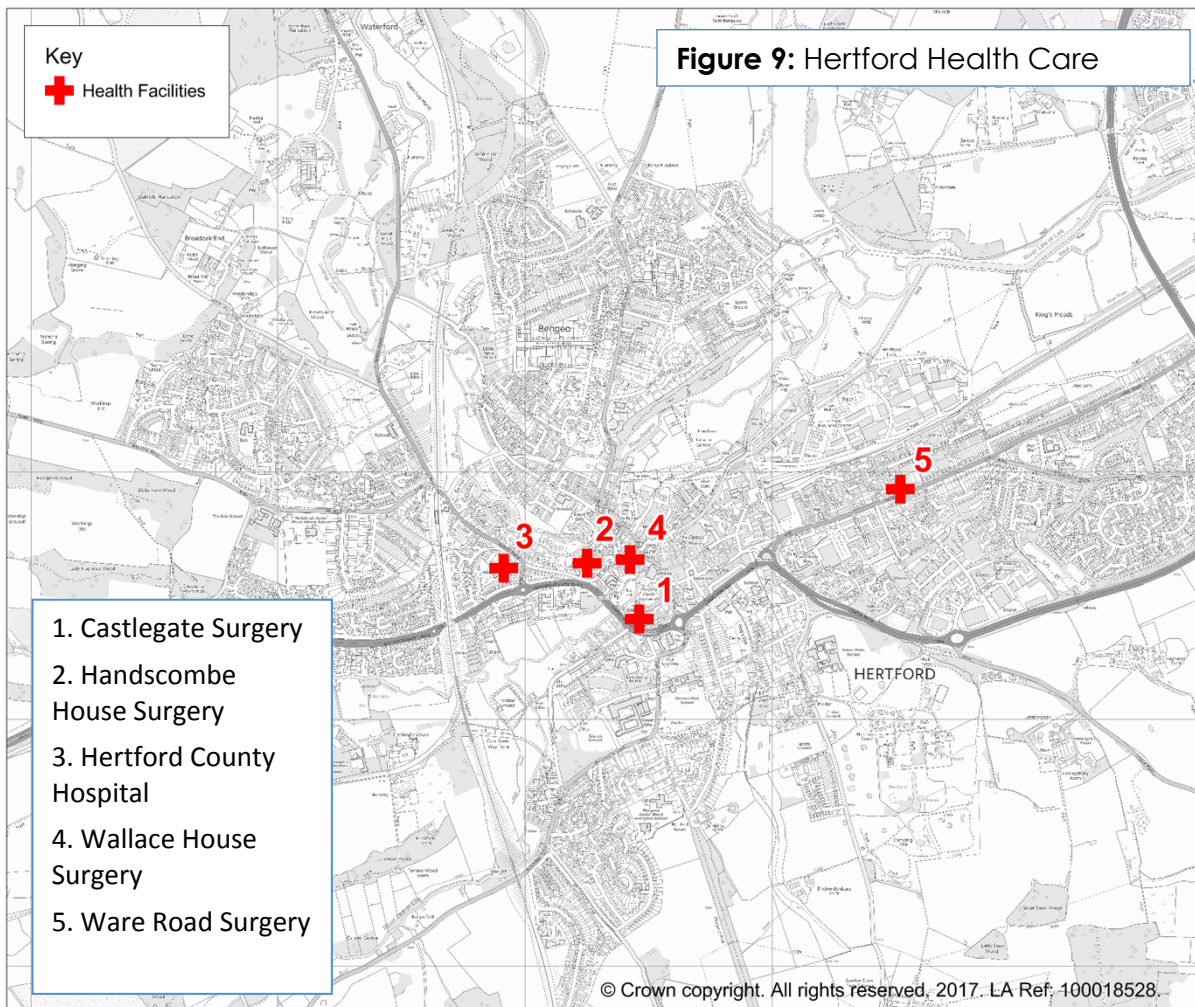
- 8.10** Advice from Hertfordshire County Council, initially received in July 2015 and supplemented by further information in January 2016, stated the capacity of the A414 through Hertford to cater for future growth was limited. Based on the housing trajectory contained within the District Plan, the County Council consider that the A414 can support planned growth identified within the first seven years up to 2024. Beyond that date a strategic solution, potentially in the form of a Hertford bypass, will be required to deliver further growth in the Hertford and Ware area. The County Council is currently preparing a 2050 Transport Vision which will inform the Local Transport Plan 4. A strategic scheme in Hertford will be identified as part of the work.
- 8.11** Further works may be required in relation to specific junctions to cater for proposed development, particularly in the Mead Lane area in accordance with the requirements contained in the adopted Urban Design Framework.
- 8.12** In addition, to highways measures, provision will be made for new bus services and walking and cycling.

Highways Funding:

- 8.13** While a preferred route for a Hertford strategic solution has not yet been identified, it is likely that such a scheme would cost in the region of £155 million to £175 million. It is therefore clear that a scheme of this scale would require national funding.
- 8.14** Site specific junction improvements will be fully funded and delivered by the developers of the respective sites.

Health Care:

- 8.15** Hertford has 6 full-time GP surgeries which are shown on the plan below. In addition, Hertford Hospital provides a range of Outpatient services for the local community as well as radiology, pathology and children's services.



Healthcare Requirements:

- 8.16** The Council is currently waiting for further information from the CCG and NHS England with regards to the potential need to expand existing health facilities in the town. Further information will therefore be provided through a review of the IDP.

Healthcare Funding:

- 8.17** All developments in Hertford will be expected to make suitable financial contributions to healthcare. These contributions would be negotiated at the planning application stage through Section 106 agreements.

Open Space and Green Infrastructure

- 8.18** The proposed developments in Hertford are not of a size that would provide significant new open space. However, developments should provide play areas and green infrastructure relating to sustainable drainage.
- 8.19** In addition, land to the south of Hertford (HERT5) will provide public open space on the western parcel of the site which will benefit the local community in that area, but also help protect the integrity of the Green Finger, of which the site forms part.

Sawbridgeworth

Introduction:

- 9.1** The development strategy for Sawbridgeworth will see the town accommodate approximately 500 dwellings across 3 sites. 300 dwellings will be split between two sites either side of West Road and a further 200 dwellings will be provided to the north of the town.

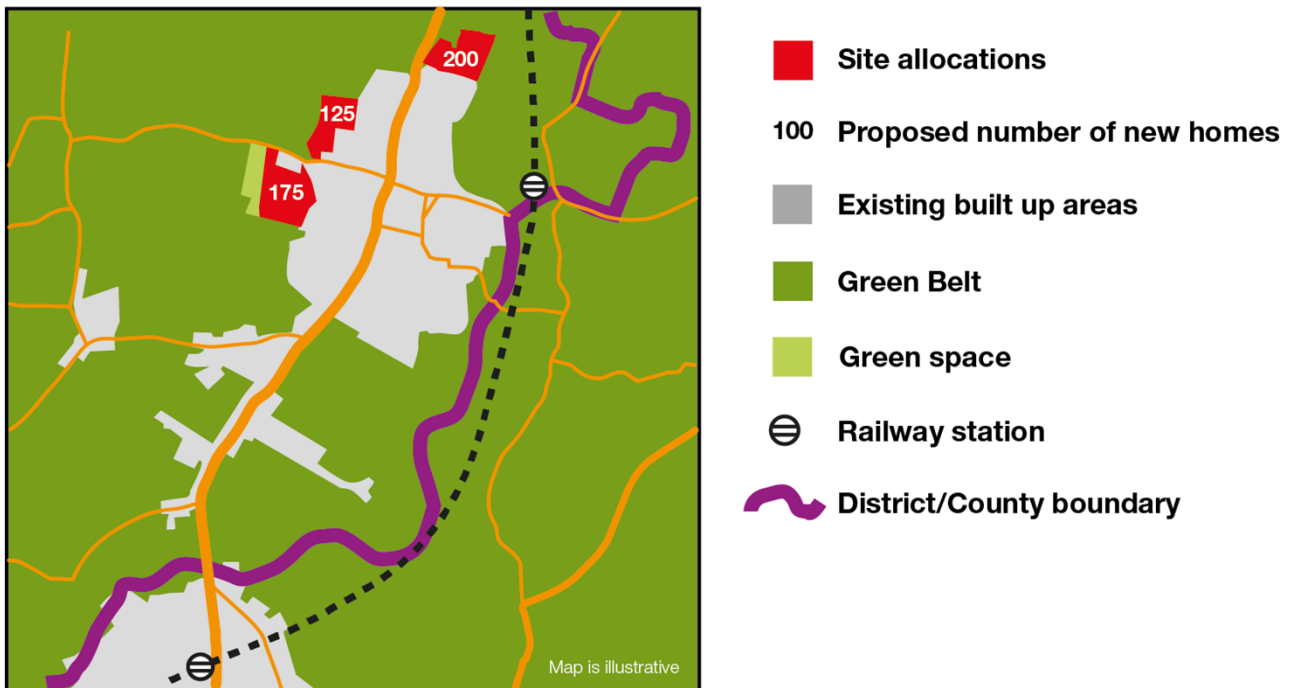
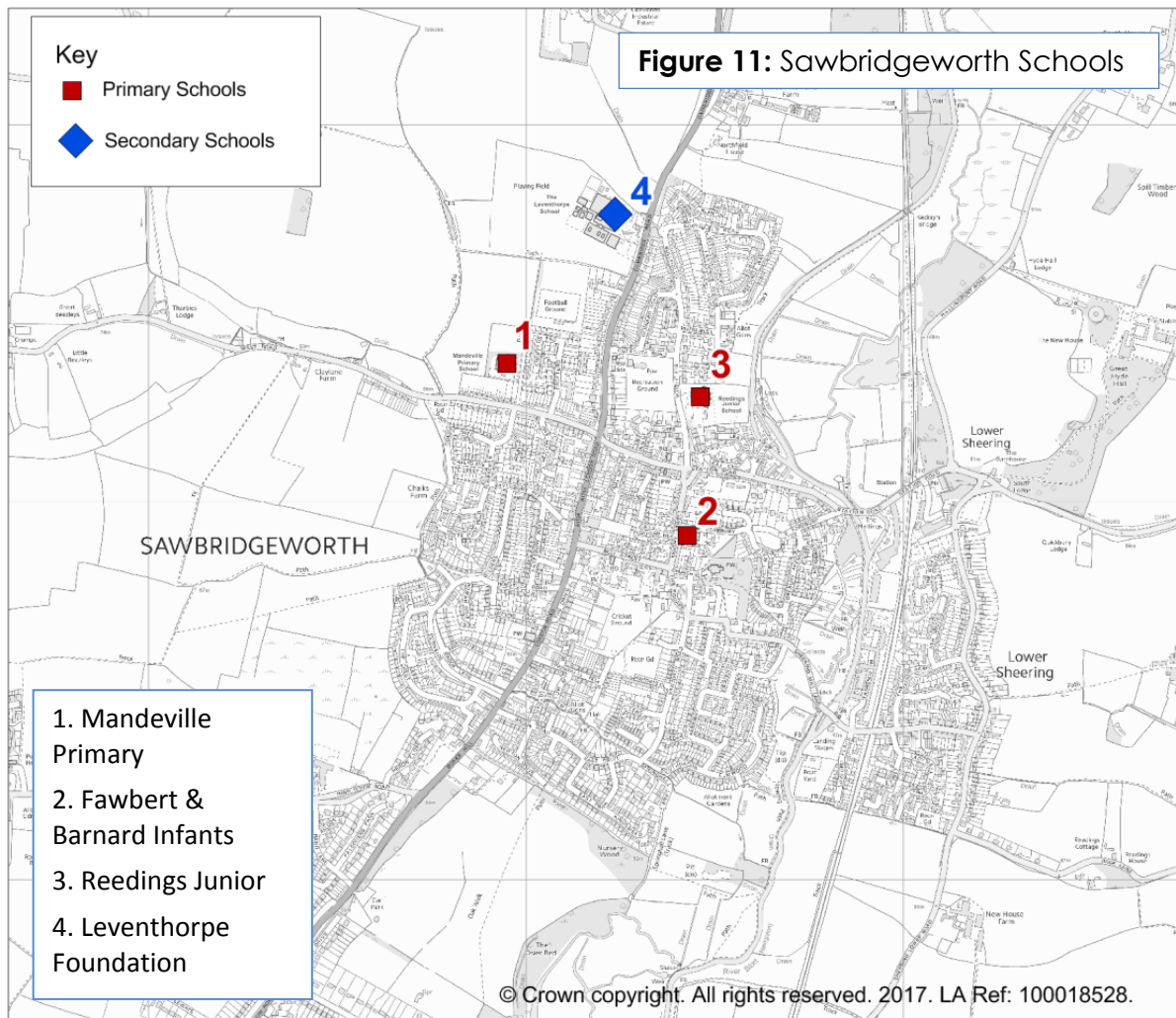


Figure 10: Sawbridgeworth Key Diagram

Education in Sawbridgeworth:

- 9.2** There are currently three primary schools in Sawbridgeworth; Mandeville, Reedings Junior and Fawbert and Barnard. To the north of the town is Leventhorpe Secondary School which has a current capacity of 6FE. In terms of secondary education, Sawbridgeworth is located within the same Education Planning Area as Bishop's Stortford.



Education Requirements:

- 9.3 Primary:** The development of 500 homes would lead to a requirement for an additional 1FE of primary provision in the town.
- 9.4 Secondary:** Taking account of proposed development in Bishop’s Stortford, the resulting demand across the education planning area is for 9.3FE of additional capacity.

Education Delivery:

- 9.5 Primary:** The additional 1FE of provision will be made by expanding Mandeville Primary School by 1FE. Given that there have been capacity issues in the town, there is also potential to provide for additional primary education on the site of Leventhorpe School.
- 9.6 Secondary:** The additional required capacity would largely be delivered in Bishop’s Stortford, this is explained more fully in the Bishop’s Stortford section. However, Leventhorpe School has aspirations to expand by 2FE and is currently seeking funding to achieve this.

Education Delivery:

- 9.7 Primary:** The expansion of Mandeville Primary School will be achieved through the receipt of Section 106 contributions from the three proposed developments in the town.
- 9.8 Secondary:** Leventhorpe School is currently in the process of seeking funding to expand by 2FE in addition to using some of its own resources. It is therefore unlikely that this expansion would require Section 106 contributions.

Transport Infrastructure:

- 9.9** Sawbridgeworth is located between Harlow and Bishop's Stortford with the M11 running to the east of the town. The A1184 runs through Sawbridgeworth. There is a train station in the town that provides services to Cambridge and London Liverpool Street.

Highways Infrastructure:

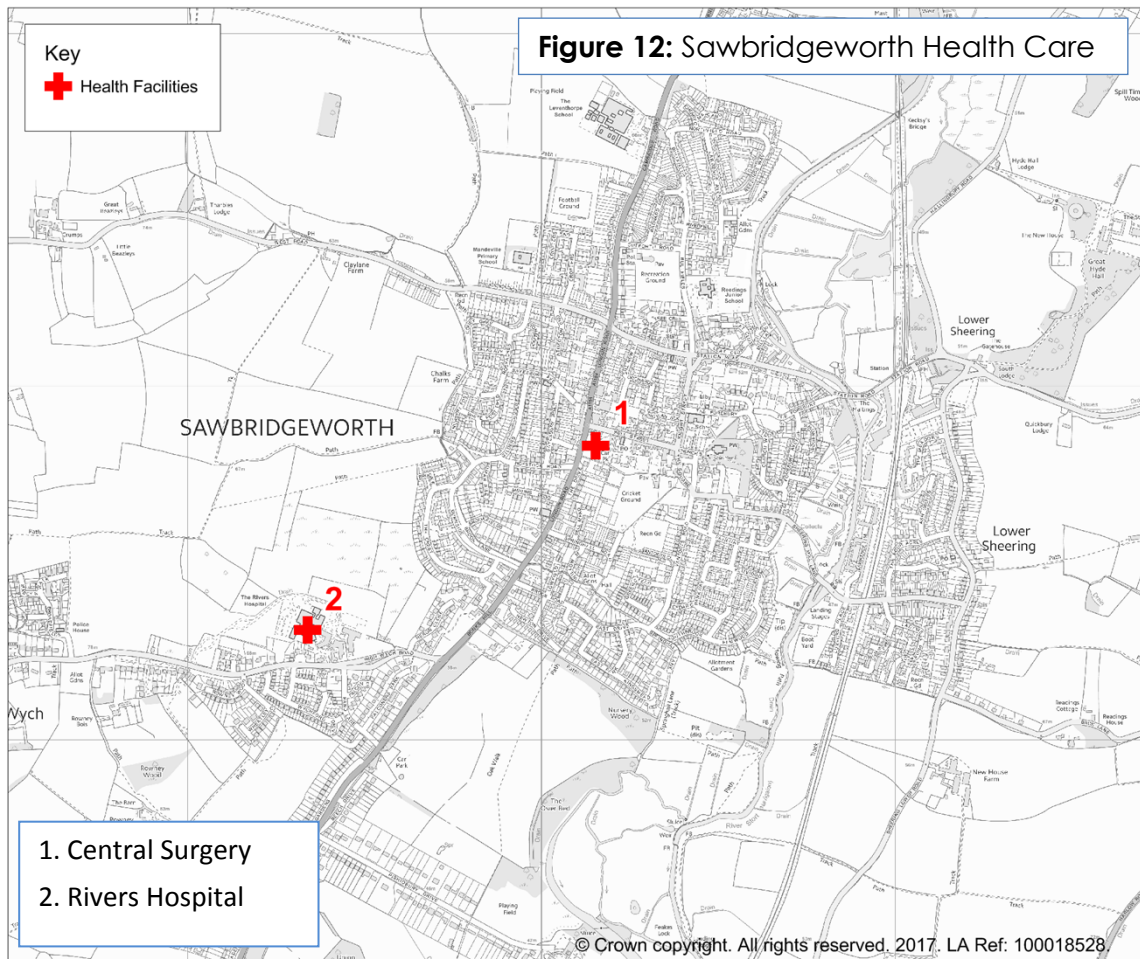
- 9.10** At present congestion is experienced at peak times on the A1184. The existing 'double roundabout' arrangement at the West Road/Station Road/A1184 junction can exacerbate this issue. Delivery of a new Junction 7a is expected to alleviate some of these issues by reducing the amount of through trips on the A1184 in the town.
- 9.11** Nevertheless, in order to ease traffic flow, it is also considered the signalisation of the existing double roundabout junction would be beneficial.
- 9.12** In addition, it is also necessary to undertake upgrade works to the A1184/High Wych Road junction on the southern side of the town on the form of signalisation.

Highways Funding:

- 9.13** The funding arrangements for Junction 7a are explained further in the Gilston Area section. The signalisation of the West Road/Station Road/A1184 junction and A1184/High Wych Road junction is directly linked to the development of the three proposed sites in the town. As such it will be funded through Section 106 contributions from those developments.

Health Care:

9.14 Sawbridgeworth has 1 full-time GP surgeries situated in the town centre. In addition, Thomas Rivers Hospital offers private medical care, covering a range of different services.



Healthcare Requirements:

9.15 The Council is currently waiting for further information from the CCG and NHS England with regards to the potential need for new or expanded healthcare facilities in the town. This information will be reflected within an updated version of the IDP.

Healthcare Funding:

9.16 The three proposed developments will provide Section 106 contributions towards healthcare, with the amount being agreed at the planning application stage.

Open Space and Green Infrastructure

- 9.17** All three developments will be expected to deliver elements of open space, including play areas. The design and nature of these spaces will be agreed at the planning application stage.
- 9.18** In addition, part of the allocation to the South of West Road includes a requirement to deliver a larger area of open space to the west of the site.
- 9.19** A large area of land to the north of Leventhorpe School is allocated for sports pitch provision. This allocation has been carried forward from the adopted Local Plan 2007. The proposed developments will be expected to deliver financial contributions towards this scheme.

Ware

Introduction:

10.1 The development strategy for Ware states that the town will accommodate 1,000 dwellings on a site to the North and East of Ware by 2033. A further 500 dwellings could be delivered beyond the plan period, should the necessary mitigation for highways constraints be implemented.

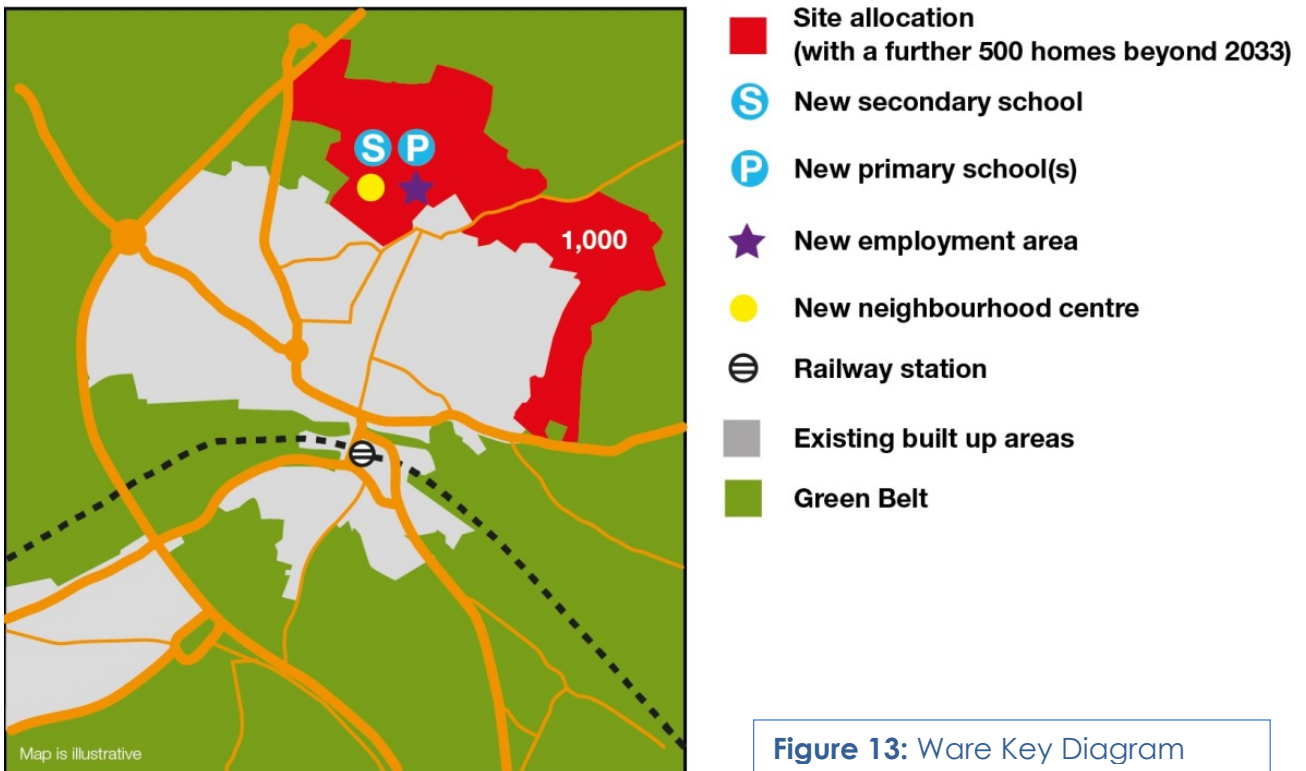
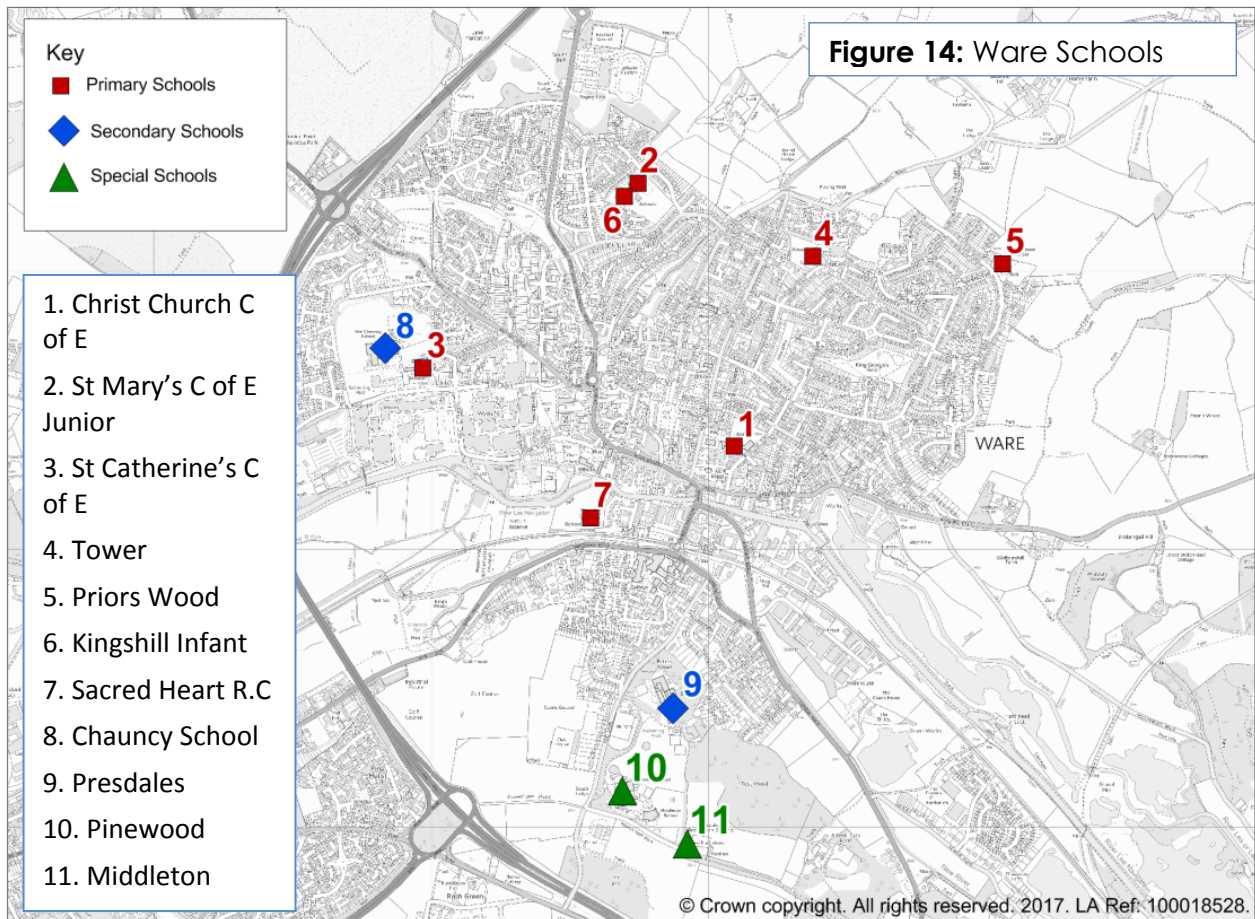


Figure 13: Ware Key Diagram

Education in Ware:

10.2 Ware currently has seven Primary Schools and two Secondary Schools. In addition there are a further two schools in Ware that provide for special educational needs. The location of each school is shown in Figure 14 below. In terms of Secondary school provision, Hertford and Ware operate as one Education Planning Area and therefore includes a further 3 secondary schools in Hertford.



Education Requirements:

10.3 Primary: The initial development of 1,000 dwellings would result in a need for 2FE of primary provision. Should the additional 500 homes come forward, then a further 1FE of provision will be required.

10.4 The 7 primary schools within Ware are all currently at capacity and therefore the need arising from the new allocation would have to be accommodated through new facilities or expansion to existing schools.

10.5 Secondary: Secondary education considers housing allocations in Hertford as well as Ware due to the shared Education Planning Area. Both settlements together will be delivering 2450 dwellings (Hertford; 950) which equates to a need of 5FE.

Education Delivery:

10.6 Primary: The Ware allocation will provide one 2FE Primary school (along with early years provision). The school will be provided within the development boundary with the exact location to be agreed through the master planning process. The timing of the delivery of the new school will be set out in the Section 106 agreement.

- 10.7** However, indicative trigger points have been provided by the developer: The construction of the primary school is expected to begin after 100 dwellings occupations, which is estimated to take place around 2022.
- 10.8** The additional 1FE of provision linked to the potential delivery of a further 500 homes beyond 2033 could be delivered in one of two ways. Firstly, the new 2FE school could be expanded to become a 3FE facility. Alternatively, the existing Priors Wood primary school could be expanded by 1FE. However, the land to expand the school is not currently within the ownership of HCC.
- 10.9** The Council will continue to work with HCC in order to identify the preferred option.
- 10.10** **Secondary:** Existing secondary schools in the Hertford and Ware area could be expanded to deliver new capacity. However, the preferred approach of HCC is to provide a new secondary school within the North and East of Ware development. Therefore the allocation will provide sufficient land for a 6FE secondary school, which will have potential to expand to 8FE. Again, the commencement of construction of the secondary education facilities will be set out in the Planning Obligations of the planning application process, there will be an agreed commencement linked to the delivery of a certain number of dwellings.
- 10.11** The developers provided trigger points for the secondary school construction; this is anticipated to start after 100 dwellings are occupied which will be around 2022. However, further discussions are required with HCC in this respect.

Education Funding:

- 10.12** At primary level, the developers will fund the school provision as it is directly linked to need arising from that site.
- 10.13** In relation to the secondary school, the development will contribute an amount that is commensurate with the level of development proposed (3FE of provision). The remainder will come forward using contributions from other developments. In this case, the 5 site allocations coming forward within Hertford will be contributing towards the development of the secondary school along with any other windfall developments in the area. At present, the number of financial contributions that can be 'pooled' to pay for individual infrastructure schemes is limited to five. However, within the Housing White Paper, the Government has committed to reviewing the existing Section 106 regime. In addition, it is possible to split a scheme into smaller projects. For instance for a new secondary school, a specific project could be the provision for Sixth Form education or the delivery of sports pitches.

Transport Infrastructure:

10.14 Ware benefits from good transport connections to both local and wider destinations both in terms of road links and train services. The town is closely located to the A10, A414 and A602 as well as train station with links to London Liverpool Street and Stratford.

Highways Infrastructure:

10.15 As noted above in the Hertford section, there are constraints related to the A414 in Hertford. Given its proximity to Hertford, this issue is also relevant to proposed development in Ware. The delivery of a further 500 homes beyond the initial 1,000 is dependent on the implementation of a strategic solution at Hertford.

10.16 The scheme to the North and East of Ware would deliver an internal spine road (indicatively illustrated in Figure 15) that would reduce the impact of the development on Ware High Street and provide some relief to other local roads. The road would be routed between Widbury Hill in the south-east to the A10/A1170 junction in the north west of the development. The entirety of the road will be provided within the boundary of the development.

10.17 Improvements to the Rush Green roundabout, located to the east of Hertford on the A10/A414 junction, will also be required. This work would involve the widening of the northern slip road where it meets the roundabout, to 3 lanes in order to accommodate the added traffic flows from the development.

10.18 In addition, to highways measures, provision will be made for new bus services and walking and cycling.



Figure 15

Highways Funding:

- 10.19** The spine road's exact location will be agreed through the master planning process. The commencement of construction will be set out in the Section 106 agreement, linked to the delivery of a certain number of dwellings.
- 10.20** Indicative trigger points have been provided by the developer who anticipates that the construction of the spine road will take place after the 750th dwelling is occupied, estimated to be in 2026, although sections of the link road are expected to be delivered as each phase comes forward. The spine road has been estimated to cost around £6,250,000 and will be funded in its entirety by the developer.
- 10.21** Rush Green roundabout improvements have been estimated to cost around £200,000 and will be funded in its entirety by the developer.

Health Care:

- 10.22** Ware has 3 full-time GP surgeries situated in the town centre; Dolphin House Surgery is the largest in terms of doctors (7) and has registered patients in excess of 11,200. Church

Street Surgery has 5 doctors caring for 9300 registered patients and Kite SA is the smallest with one doctor for 2900 registered patients.



Healthcare Requirements:

- 10.23** The Council is currently waiting for further information from the CCG and NHS England with regards to how new facilities could be provided on site. However, the proposals do include provision for a health facility that will include GP services. The facility provided will be of sufficient size to meet the needs of the proposed development. Further information will be provided through a review of the IDP.

Healthcare Funding:

- 10.24** The healthcare facilities on site will be fully funded by the developers.

Open Space and Green Infrastructure

- 10.25** This development provides an opportunity to provide a significant amount of open space.
- 10.26** The site will also make provision for playing pitches and play spaces as well as allotments. The design and location will be identified through future masterplanning.

East of Stevenage

Introduction

- 12.1** This development comprises 600 dwellings on the eastern edge of Stevenage, within East Herts District. The Council has worked in a collaborative way with Stevenage and North Herts Councils, as well as HCC, in order to plan for necessary infrastructure provision, both on site and in the wider Stevenage area.

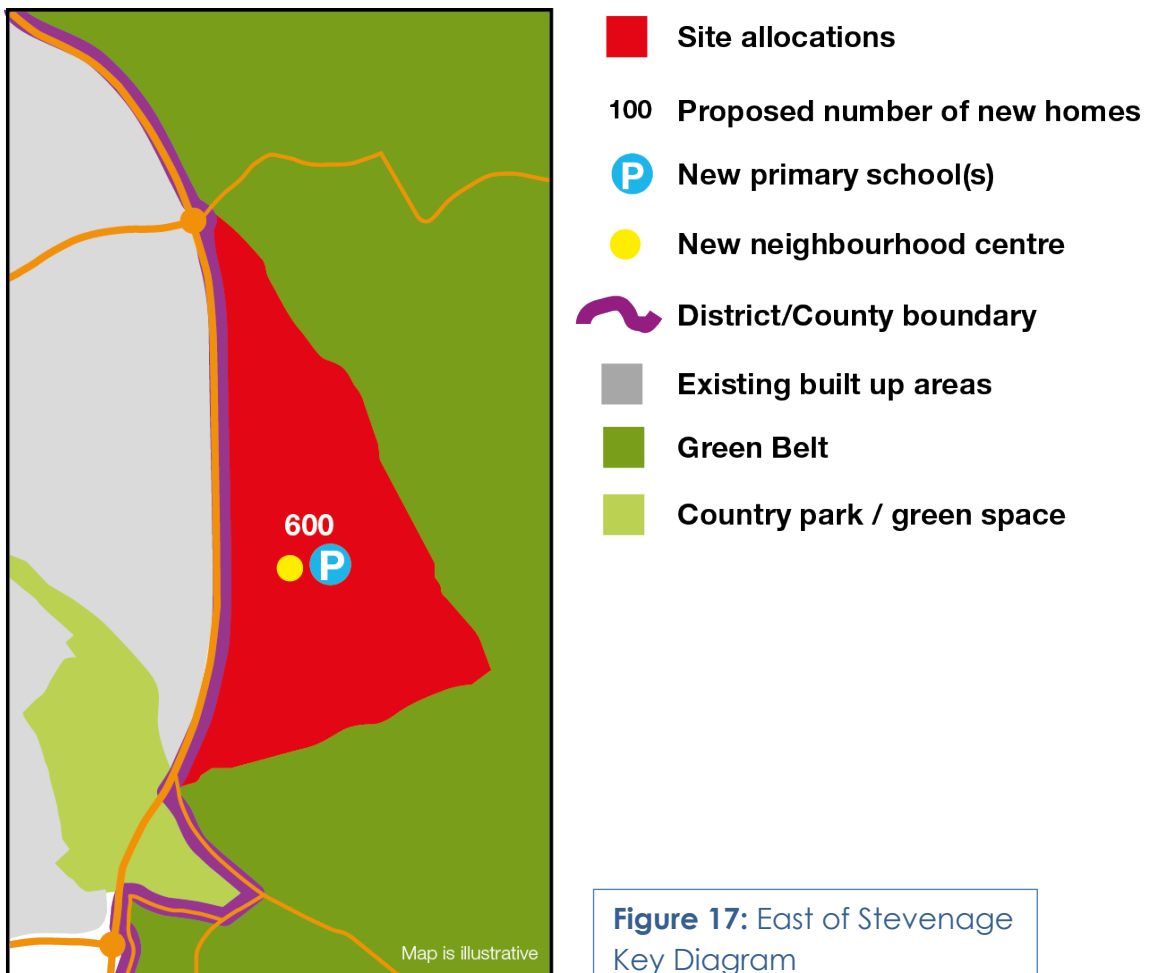


Figure 17: East of Stevenage
Key Diagram

Education

Education Requirements

- 12.2** In itself the development would only need just over 1FE of provision for both primary and secondary needs. However, the site must be looked at in the context of educational capacity elsewhere in Stevenage.

Education Delivery

- 12.3** The development will make provision for a 2FE primary school which will meet the needs arising from the site, as well as a part of the undersupply elsewhere in Stevenage.
- 12.4** With regards to secondary education, a new school is required in order to meet the needs of the wider Stevenage area, taking into account development on this site, but more importantly, larger scale development in Stevenage itself and on the edge of the town within North Herts. HCC has indicated that its preferred location for a new school is on the northern edge of the town, within North Herts. All four authorities are continuing discussions in order to find the most appropriate solution to this issue.

Education Funding

- 12.5** The development will provide a suitable level of financial contribution commensurate to the amount of development proposed. The rest of the funding for both primary and secondary education will be delivered through Section 106 agreements from other developments in Stevenage/on the edge of Stevenage within North Herts.

Transport Infrastructure

- 12.6** The site is well located to the existing road network in Stevenage with three accesses currently proposed on Gresley Way.

Highways Infrastructure

- 12.7** In terms of access, the two existing junctions with Uplands and The White Way would be upgraded to allow access to the site, while a new third access point, to the south of The White Way would also be provided.

12.8 Beyond access arrangements, the only highways mitigation scheme that would be required is an upgrading of the existing Gresley Way/A602 roundabout.

Highways Funding

12.9 All required highways works will be funded by the developer.

Health Care

12.10 There are various health facilities located within Stevenage. However, the development needs to provide sufficient facilities to meet the needs of the new residents in that location in order to avoid adding additional pressure to existing resources.

Healthcare Requirements

12.11 The Council is currently waiting for further information from the CCG and NHS England with regards to how new facilities could be provided on site. However, the proposals do include provision for a health facility of up to 600 square metres in size that will include GP services. Further information will be provided through a review of the IDP.

Healthcare Funding

12.12 The healthcare facilities will be fully funded by the developers.

Open Space and Green Infrastructure

12.13 The development will provide an amount of open space that is commensurate to the size of the development. The design and location will be identified through future masterplanning. The District Plan policy requires consideration of the need to provide cemetery space in this location.

East of Welwyn Garden City

Introduction

12.1 This development of 2,550 homes is a cross boundary development located both within East Herts and Welwyn Hatfield. The proposals include 1,350 homes in East Herts with the remainder within Welwyn Hatfield. Given the nature of this site, a considerable amount of joint working has taken place between the two Councils in order to plan for infrastructure delivery.

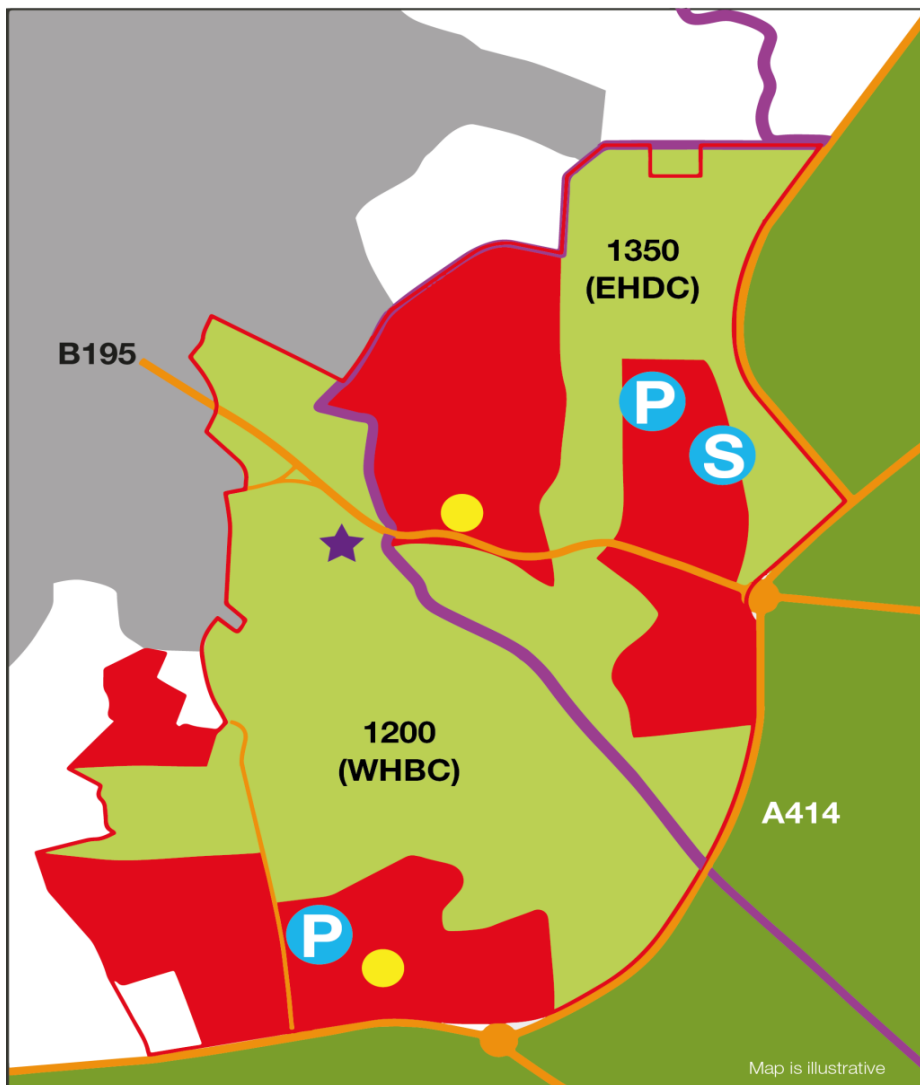


Figure 18: East of Welwyn Key Diagram

- | | |
|---|---|
| ■ Site allocations | ● New neighbourhood centre |
| 100 Proposed number of new homes | ~ District/County boundary |
| P New primary school(s) | Existing built up areas |
| S New secondary school | Green Belt |
| ★ New employment area | Country park / green space |

Education

Education Requirements

- 12.2** There are a number of existing schools in Welwyn Garden City. However the size of the site requires new provision to be made. In order to cater for all educational requirements arising from the site, 5FE of primary provision is required, based on the standard calculation of 1FE per 500 dwellings.
- 12.3** In order to support the development itself, and also wider needs in Welwyn Garden City, a site for a 6FE secondary school is also required.

Education Delivery

- 12.4** At present it is anticipated that the primary provision will be delivered across two sites. A 2FE school with early years provision will be delivered within Welwyn Hatfield, while a school of up to 3FE with early years provision will also be located in East Herts.
- 12.5** The secondary provision will be delivered through a new school of up to 8FE in East Herts.

Education Funding

- 12.6** The need for the two primary schools is directly linked to the scale of proposed development. As such, the developers will deliver and fully fund these schemes.
- 12.7** The secondary school will meet wider needs, beyond those emanating from the development itself. As such the land for the school will be provided, and a significant Section 106 contribution will be made towards the delivery of the school. The remaining funding will be delivered through Section 106 contributions from other development schemes in Welwyn Garden City.
- 12.8** The phasing will be agreed as part of the Section 106 agreement which will form part of a future planning permission.

Transport Infrastructure

- 12.9** The site is well located in close proximity to the strategic road network, particularly the A414 and A1(M). The B195 is routed through the middle of the development site. The site will form an extension to Welwyn Garden City which has a train station in the town centre.

Highways Infrastructure

- 12.10** While a substantial amount of development is proposed for this location, it is not considered that strategic measures will be required in order to mitigate potential impacts on the highway network in the immediate vicinity of the site. Capacity issues with regards to the A414, particularly as it passes through Hertford, have been identified earlier in this document. However, while this development is located on the A414 corridor, the County Council is satisfied that eastward traffic movements towards Hertford would be limited. This has been evidenced by the developers own transport model which was agreed and signed off by HCC as Highways Authority.
- 12.11** Upgrades to the two existing junctions on the A414 will be required (Birchall Lane and Holwell Lane), and there will also be a need for capacity upgrades to the B195.
- 12.12** Along with other developments in the wider area, development in this location contributes to pressures on the A1(M), in particular Junctions 3 and 4. A need to upgrade these junctions has therefore been identified. The need for these works has been identified within the HCC 2050 Transport Vision.
- 12.13** In addition, to highways measures, provision will be made for new bus services and walking and cycling.

Highways Funding

- 12.14** All of the required on site highways works, including access and the relevant upgrades to the A414 junctions and the B195, will be funded in full by the developers.
- 12.15** Upgrades to Junctions 3 and 4 of the A1(M) are likely to require bids for national funding. In particular the works to the 'Jack Oldings' roundabout at Junction 4 is likely to cost in excess of £250 million.

Health Care

12.16 There are various health facilities located within Welwyn Garden City. However, as with education facilities, the development needs to provide sufficient facilities to meet the needs of the new residents in that location in order to avoid adding additional pressure to existing resources.

Healthcare Requirements

12.17 The Council is currently waiting for further information from the CCG and NHS England with regards to how new facilities could be provided on site. However, the proposals do include provision for a health facility within the East Herts part of the development that will include GP services. Further information will be provided through a review of the IDP.

Healthcare Funding

12.18 The healthcare facilities will be fully funded by the developers.

Open Space and Green Infrastructure

12.19 This development provides an opportunity to provide a significant amount of open space. With regards to strategic schemes, a large parkland will be created by utilising the former landfill part of the site within Welwyn Hatfield.

12.20 In addition, the development will also benefit from its proximity to Panshanger Park which has recently been made accessible to the public. Upgrading of part of the Cole Green Way will also be delivered as part of this scheme.

12.21 The site will also make provision for playing pitches and play spaces as well as community orchards and allotments. The design and location will be identified through future masterplanning.

Gilston Area

Introduction

13.1 The Gilston Area is a proposal for a large development of 10,000 homes, to be delivered in this Plan period and beyond. Building at this scale ensures that a considerable level of new infrastructure can be provided on site, while substantial financial contributions can also be made in relation to strategic off-site infrastructure. Given likely build out rates, it is anticipated that approximately 3,000 homes will be provided by the end of the Plan period in 2033, with the remainder coming forward after that date.

13.2 Infrastructure provision in this location needs to be considered in light of the successful Harlow and Gilston Garden Town bid. As part of this ongoing work with our neighbouring authorities, an additional Infrastructure Delivery Plan for the Garden Town area will be prepared.

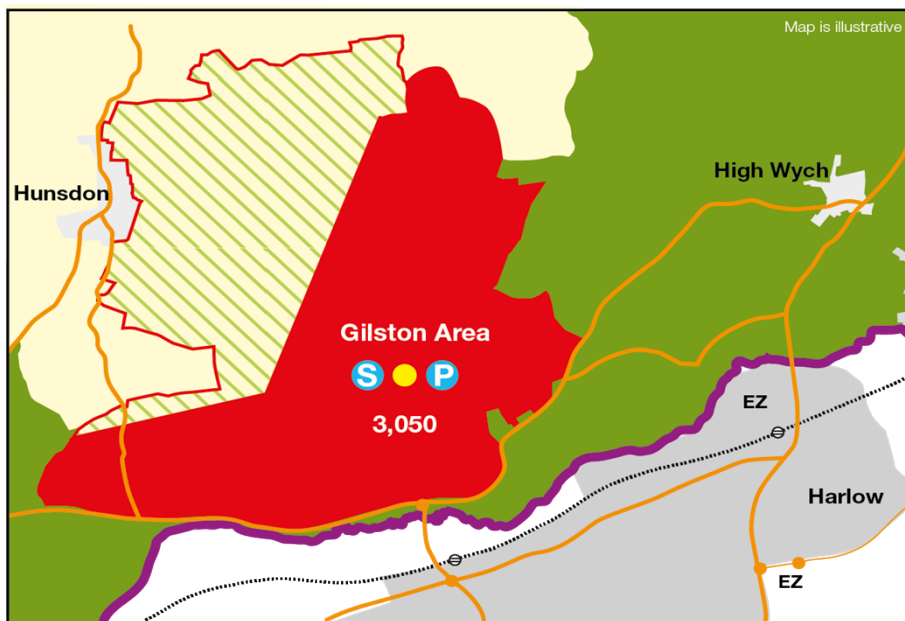


Figure 19: Gilston Area Key Diagram

- | | |
|--|--|
| ■ Site allocation developed area (with a further 6,950 homes beyond 2033) | Rural Area Beyond the Green Belt |
| S New secondary schools | Existing built up areas |
| P New primary schools | Green Belt |
| New neighbourhood centre | Community trust open space land |
| District/County boundary | ⊖ Railway station |
| | EZ Enterprise Zone |

Education

Education Requirements

- 13.3** The only existing schools located in close proximity to the proposed development area are either village primary schools or schools located within Harlow. There are capacity concerns with these schools, and as such, the Gilston Area development would need to deliver sufficient education provision, in order to meet all needs arising from the site.
- 13.4** Based on the standard approach of providing 1FE per 500 new dwellings, a scheme of 10,000 homes would require 20 FE of provision for both primary and secondary education. However this development will take place over a significant period of time, and the pupils living in the houses that are occupied first are likely to have finished their education by the time the later phases of development are completed.
- 13.5** A child yield model has therefore been utilised which uses assumptions based on housing type, size and tenure as well as phasing. This model identifies what the peak demand for education provision is likely to be over the lifetime of the development. Based on this approach, the required provision is for 14FE of secondary education and 15FE of primary education. This will need to be kept under review as more detail emerges through the masterplanning process with regards to the assumptions that have informed the model at this stage.

Education Delivery

- 13.6** The Gilston Area development concept is based around the delivery of seven villages. In terms of education, five of these villages will contain primary schools (3FE each), while two secondary schools of 7FE each will be provided in a suitable location. The primary schools will all include provision for early years education. Further work is required in order to identify the phasing of school places alongside the delivery of houses. However, school places will be available at the stage that the first homes are completed. The phasing will be agreed as part of the Section 106 agreement which will form part of a future planning permission.

Education Funding

- 13.7** The cost of this education provision is identified within the table in Appendix H. The developers will fund the delivery of these facilities, and as such there are not considered to be any funding issues.

Transport Infrastructure

13.8 Part of the reason why the Gilston Area is considered to be a sustainable location for growth is its proximity to the strategic road network. In particular, the A414 runs to the south of the site, while the M11 is located just to the east. The site is also close to Harlow Town train station which has regular services to Cambridge and London Liverpool Street.

Highways Infrastructure

13.9 While the site is in proximity to major roads, it is clear that 10,000 homes in this location, in conjunction with other developments in the Harlow area, will have a significant impact on the highway network, including existing routes through Harlow.

13.10 The Council has worked closely with Epping Forest and Harlow Councils as well the Essex and Hertfordshire County Councils and Highways England in order to identify the mitigation measures that would be required to deliver approximately 16,000 homes in the wider Harlow area by 2033 (including 3,000 in the Gilston Area). Of primary importance is the delivery of a new Junction 7a on the M11. A planning application for this scheme was submitted by Essex County Council at the end of January and is expected to be decided by the end of June 2017.

13.11 The remaining schemes are a package of measures, the timing of which will be considered in light of the identification and phasing of other developments in the Harlow area. The schemes include widening of the existing Stort crossing from the Eastwick roundabout to the Burnt Mill roundabout, provision of a second Stort crossing, and upgrade works to Junctions 7 and 8 of the M11. Works on specific junctions in Harlow itself have also been identified as being necessary.

13.12 It is envisaged that the widening of the existing Stort crossing could facilitate the delivery of a sustainable transport corridor which would run from the Gilston Area, through the town centre, to potential new development to the south of Harlow, within Epping Forest District.

13.13 In terms of need, the Second crossing would not be required until after the existing crossing had been widened. However, it is an aspiration of the joint working Councils to deliver the two schemes at the same time in order that provision for sustainable transport can be made from the earliest stages of development.

13.14 It is likely that further mitigation measures would be required to deliver the full 10,000 homes beyond the Plan period. A VISUM transport model run will be undertaken prior to the District Plan Examination which will assess the impact of this full development on the

highway network. HCC is also undertaking similar modelling. The IDP will be updated to take account of these further measures which could include a Harlow Northern Bypass.

- 13.15** At this stage, it is not possible to identify how these mitigation schemes will be phased as this is dependent on the location and timing of other developments around Harlow. The delivery of these mitigation measures will be dealt with through the Garden Town IDP.
- 13.16** In addition, to highways measures, provision will be made for new bus services and walking and cycling, including improved access to Harlow Town train station.

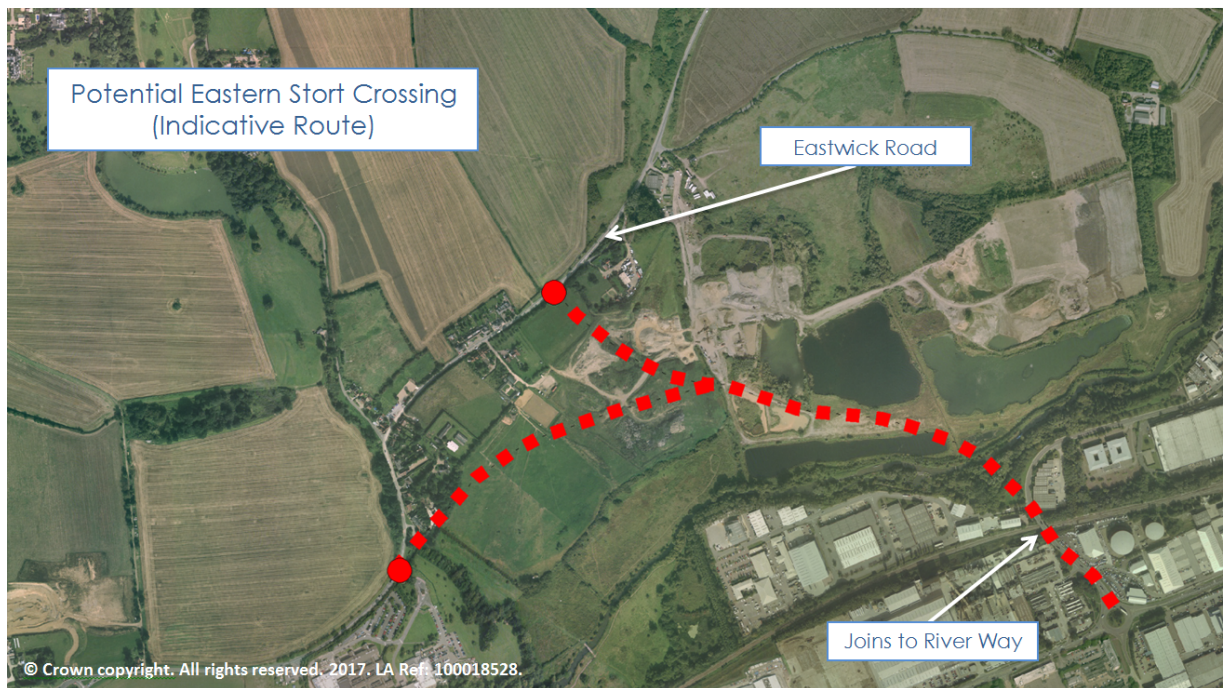


Figure 20

Highways Funding

- 13.17** All of the required on site highways works, including access, will be funded in full by the developers. The strategic mitigation schemes identified above will be delivered through a mixture of Section 106 contributions, of which Gilston would be expected to provide a significant amount being the largest proposed development, and funding from national sources including Road Investment Strategy Funding. The schemes are not all fully funded at present; however the Council will continue to work with our neighbouring authorities, the County Councils and Highways England in order to apply for different funding streams. This is likely to include discussions with the Government as part of the Garden Town proposals.

Health Care

13.18 There are various health facilities in the area surrounding Gilston within settlements such as Harlow and Ware. However, as with education facilities, the Gilston development needs to provide sufficient facilities to meet the needs of the new residents in that location in order to avoid adding additional pressure to existing resources.

Healthcare Requirements

13.19 The Council is currently waiting for further information from the CCG and NHS England with regards to how new facilities could be provided on site. However, the proposals do include provision for two health centres that incorporate GP surgeries and other healthcare requirements such as dentists. Further information will be provided through a review of the IDP.

Healthcare Funding

13.20 The healthcare facilities will be fully funded by the developers.

Open Space and Green Infrastructure

13.21 Given the size of the Gilston Area development, it provides a unique opportunity to deliver a substantial amount of publicly accessible green space. As identified within the District Plan (Policy GA1), the northern portion of the site will be used to provide new parklands which will include the existing Hunsdon Airfield. Within the area to be developed, there will be numerous green spaces and play areas as well as publicly accessible sports pitches and allotments. The design and location of these facilities will be identified through future masterplanning. There is also potential to improve access to the Stort Valley area, which lies outside of the development site.

13.22 One of the principles of development in this location is that the ownership of the parklands, open spaces and other community assets will be transferred to a Community Trust or equivalent which will provide protection in terms of ensuring that further development beyond the 10,000 does not take place. Again, the details of this process will be confirmed at a later stage.

13.23 The District Plan policy also requires consideration of the need to provide cemetery space in this location.

Other Infrastructure

13.22 A considerable amount of further infrastructure will be provided on site, directly funded in full by the developers. A list is provided in Appendix H. However, it will include community centres, places of worship, libraries, recycling facilities and a police station.

Rural Area

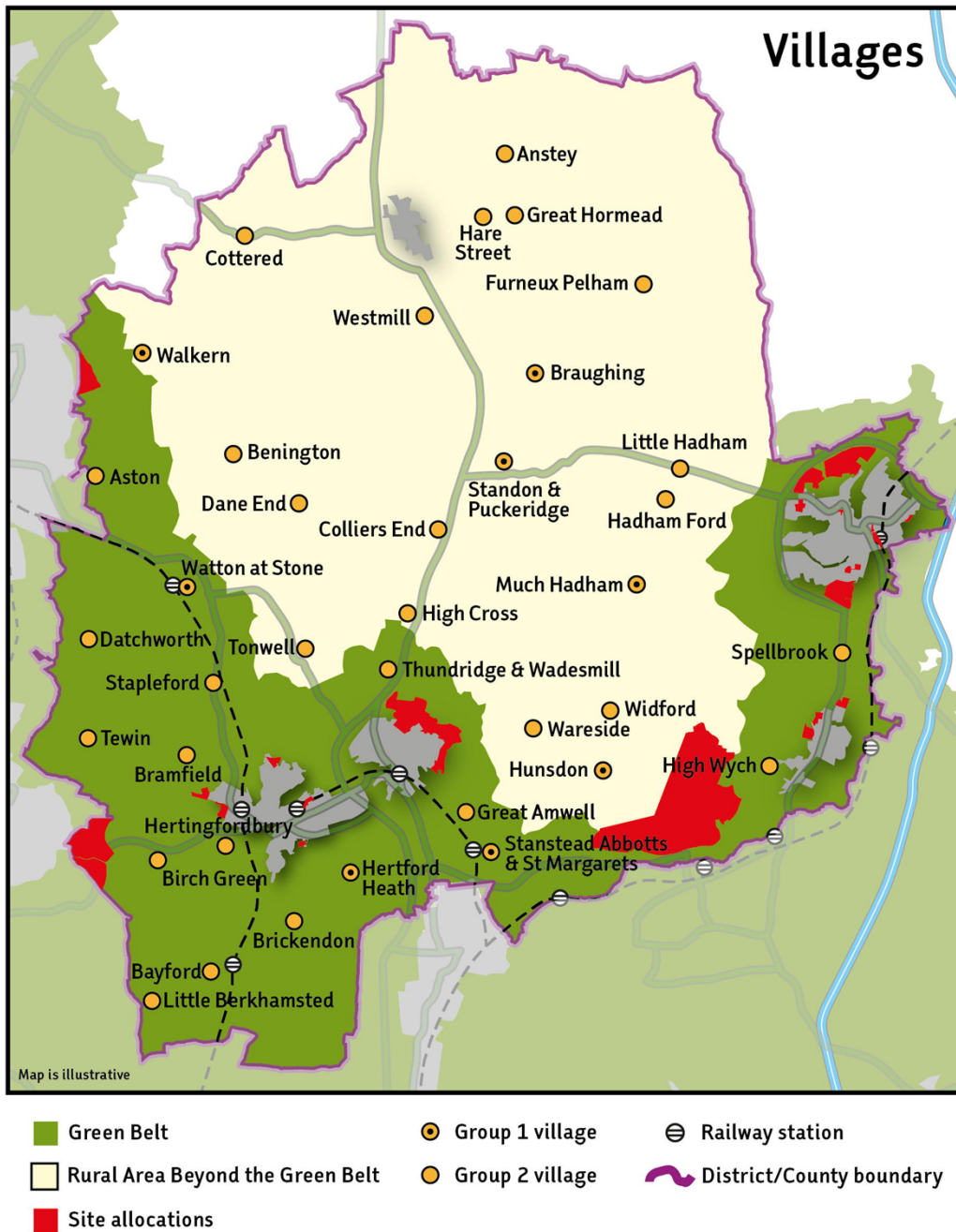


Figure 21: Rural Area Key Diagram

14.1 A limited amount of development has been identified for the rural area within the District Plan. A minimum of 500 dwellings will be delivered over the Plan period, largely focused on villages classified as ‘Group 1’ within the Rural Area Beyond the Green Belt.

- 14.2** Given the limited scale of development proposed for these locations, it not considered necessary to identify specific infrastructure schemes that may be required.
- 14.3** Proposals will be considered on a case by case basis as and when a planning application is submitted. Any development proposal would need to be considered to be acceptable in highways terms. Certain schemes may require highways works in relation to access.
- 14.4** In addition, there are known constraints with regards to school capacity in certain villages and again this issue should be considered by the County Council as part of the planning application process.

Appendices

Appendix A: Bishop's Stortford

Town Wide Infrastructure

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Widening of Station Road Bridge to provide safe access for pedestrians and cyclists	HCC	Unknown	Unknown	Unfunded It is likely that this scheme would be delivered through S106 contributions. However, the funding arrangements have not been confirmed yet.	The emerging Bishop's Stortford Town Centre Planning Framework seeks to address vehicular, pedestrian and cycle movements in the town centre. It is therefore likely that the IDP will need to be updated to reflect the outputs of that study in due course. The study area includes proposed development sites including the Goods Yard, Causeway/Old River Lane and the Mill Site.
Transport	Bus Priority measures along London Road into town centre	HCC	Unknown	Unknown	Unfunded It is likely that this scheme would be delivered through S106 contributions. However, the funding arrangements have not been confirmed yet.	The emerging Bishop's Stortford Town Centre Planning Framework seeks to address vehicular, pedestrian and cycle movements in the town centre. It is therefore likely that the IDP will need to be updated to reflect the outputs of that study in due course. The study area includes proposed development sites including the Goods Yard, Causeway/Old River Lane and the Mill Site.
Community Facilities	Possible expansion of health facilities in accordance with CCG requirements	NHS	N/A	N/A	N/A	Capacity constraints with existing GP surgeries in the town are well known. Haymeads, Parsonage and Bishop's Park surgeries are all 'severely constrained', while South Street and Church Street surgeries have 'limited capacity'. The Council is currently awaiting comments from the NHS with regards to how capacity should be increased over the Plan period. It is expected that this information will arrive prior to Submission of the District Plan on 31 st March. It should be noted that the planning permission for Bishop's Stortford North includes provision of a 3,000 sq m health facility.

BISH4: Reserve Secondary School Site, Hadham Road

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Sustainable transport measures that include walking and cycling and enhanced passenger transport services	Developer/HCC	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Community Facilities	Retention and enhancement of outdoor playing pitches on the western parcel of the site.	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no	This is dependent on further discussions with HCC and the way in which they wish to progress the current planning applications.

BISH5: Bishop's Stortford South						
Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Education	2FE primary school with potential to expand to 3FE, including Early Years facilities.	Developer/HCC	£7,500,000	2017-2022	Partially Funded The developer will be required to deliver a significant amount of funding towards provision of the school, commensurate with the size of the development (1.5FE). HCC will consider how the remaining costs should be funded.	
Education	A 6FE secondary school with potential to expand to 8FE.	Developer/HCC	£20,000,000	2017-2022	Partially Funded The developer will be required to deliver a significant amount of funding towards provision of the school, commensurate with the size of the development (1.5FE). HCC will consider how the remaining costs should be funded.	The new school facility in this location may accommodate a re-located Bishop's Stortford High School. If so, the profits made from residential development of the existing High School site may provide the necessary residual funding for this scheme.
Transport	Various access arrangements and local junction upgrades including: priority junctions on Obrey Way, a roundabout on St. James Way, a roundabout at the Whittington Way/Bishop's Avenue junction and improvements to the existing London Road/Whittington Way junction.	HCC	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	The detailed design for these works will be considered through the masterplanning/planning application stage.
Transport	Sustainable transport measures that include walking and cycling and enhanced passenger transport services	Developer/HCC	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Utilities	Upgrades to local sewerage infrastructure	Thames Water	Unknown	2017-2022	Funded – Subject to Further Work to Identify Costs The funding of upgrades to the sewerage network must be provided by the developer and Thames Water. A drainage strategy is required in order to identify costings. While potential costs are currently unknown, there is not a requirement to find alternative sources of funding.	This item is in response to Thames Water's representations on the Pre-Submission District Plan which identified that a number of proposed allocations may not have sufficient capacity to cater for development, and therefore upgrades could be required. The details of required work will be dealt with through drainage strategies at the planning application stage. It should be noted that Thames Water has a legal obligation to ensure that developments are served by sufficient infrastructure.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

					additional funding is expected to be required.	
BISH6: Bishop's Stortford High School Site						
Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Education	Expansion of Thorley Hill Primary School by 1FE	HCC	£3,000,000	2017-2022	Unfunded There is not currently any funding arrangements secured for this scheme.	This development is dependent on the re-location of the existing High School to a new site at BISH5: Bishop's Stortford South. If this does occur, the profits made from residential development of the existing High School site may provide the necessary residual funding for this scheme. It should also be noted that HCC is currently consulting on proposals to expand St Joseph's Catholic Primary School by 0.5FE.
Community Facilities	Retention and enhancement of outdoor playing pitches on the western parcel of the site.	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	This development is dependent on the re-location of the existing High School to a new site at BISH5: Bishop's Stortford South.
Transport	Sustainable transport measures that include walking and cycling and enhanced passenger transport services	Developer/HCC	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
BISH7: The Goods Yard						
Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Passenger Transport Interchange and parking provision at Bishop's Stortford railway station	Developer/Network Rail	Unknown	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	A planning application for the Goods Yard has been submitted but hasn't yet been determined by the Council. Consideration of this site forms part of the emerging Bishop's Stortford Town Centre Planning Framework.

Transport	Pedestrian and cycle routes from Goods Yard to town centre and station via Anchor Street Leisure Park	Developer/HCC	Unknown	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Enhanced passenger transport services to the town centre and the station including the creation of a sustainable route through the site	Developer/HCC	Unknown	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

BISH8: The Causeway/Old River Lane

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
						This site is now in Council ownership and consideration is being given to the type of development that should be provided, along with any necessary supporting infrastructure. However, it likely that a mix of uses will be provided including residential, retail and community uses. The IDP can be updated to reflect the outcome of these discussions in due course.

BISH9: East of Manor Links

Transport	Sustainable transport measures which encourage walking and cycling through the site, including the provision of a new pedestrian crossing point on Dunmow Road	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

BISH10: The Mill Site

Transport	New footbridge to facilitate pedestrian access to the town centre over the river Stort	Developer/Canals and Rivers Trust	Unknown	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	The delivery of this site is dependent on the re-location of existing uses. Consideration of this site forms part of the emerging Bishop's Stortford Town Centre Planning Framework.
Transport	Pedestrian and cycle friendly route between the station to the south of the site along Dane Street towards new crossing over Stort	Developer	Unknown	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	N/A	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

Appendix B: Buntingford

Town Wide Infrastructure

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Education	2FE First School	HCC	£7,500,000	By 2019	Partially Funded HCC considers that sufficient Section 106 contributions have been collected in order to purchase a suitable site. HCC is also considering how the remaining costs could be funded including applying for funding from the Department for Education.	It should be noted that HCC is currently consulting on a proposal to expand Millfield First School by 0.5FE
Education	Expansion of Edwinstree Middle School	HCC	Unknown	2017-2027	Partially Funded Section 106 contributions have been secured towards Middle tier education needs. However, it is not clear at present how the remainder would be funded.	The priority for Buntingford is the delivery of a new First School. Further capacity for Middle and Upper tier education is a longer term requirement.
Education	Expansion of Freman College	HCC	Unknown	2017-2027	Partially Funded Section 106 contributions have been secured towards Upper tier education needs. However, it is not clear at present how the remainder would be funded.	The priority for Buntingford is the delivery of a new First School. Further capacity for Middle and Upper tier education is a longer term requirement. The maximum expansion potential for Freman College is up to 10FE.
Transport	Upgrades to A10/London Road roundabout	HCC	£1,960,000	2017-2022	Funded This scheme has secured funding from the Hertfordshire Local Enterprise Partnership.	
Transport	Dualling of A10 southbound	HCC	Unknown	2022-2033	Unfunded There is not currently any funding arrangements secured for this scheme.	
Community Facilities	Possible expansion of health facilities in accordance with CCG requirements	NHS	N/A	N/A	N/A	The Council is currently awaiting comments from the NHS with regards to how capacity should be increased over the Plan period. It is expected that this information will arrive prior to Submission of the District Plan on 31 st March. As such the IDP will be updated again shortly to incorporate this information.

Appendix C: Hertford

Town Wide Infrastructure

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Education	Expansion of Hollybush Primary School by 1FE	HCC	£3,000,000	2017-2022	Partially Funded Development to the west of Hertford, comprising 500 dwellings would result in a requirement to deliver 1FE of additional education. Section 106 contributions from these schemes should provide a significant amount of funding – however this is subject to negotiation at the planning application stage.	
Community Facilities	Possible expansion of health facilities in accordance with CCG requirements	NHS	N/A	N/A	N/A	The Council is currently awaiting comments from the NHS with regards to how capacity should be increased over the Plan period. It is expected that this information will arrive prior to Submission of the District Plan on 31 st March. As such the IDP will be updated again shortly to incorporate this information.
Transport	Bus priority measures along A119 and A414	HCC	Unknown	2027 onwards	Unfunded There is not currently any funding arrangements secured for this scheme.	This is a long term aspiration that could only be delivered following the implementation of a strategic highways solution (such as a bypass) in Hertford. Delivery of a bypass would free up capacity on existing routes in the town, potentially allowing the delivery of bus priority measures.
Transport	Access improvements at Hertford North railway station to include a new bus interchange.	Network Rail	Unknown	Unknown	Unfunded There is not currently any funding arrangements secured for this scheme. However, it is likely that Network Rail would deliver this scheme.	

HERT2: Mead Lane Area

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Upgrade existing footways on Mead Lane to 3m pedestrian/cycleway to the south side of Mead Lane in addition to improvements to the towpath and links with the adjoining area and the town centre (in particular addressing links to Hartham Common and Kings Meads)	Developer/HCC	N/A	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	These measures are contained within the adopted Mead Lane Urban Design Framework.
Transport	The widening of Marshgate Drive to allow for improved vehicular and pedestrian access and car parking/car share scheme to be delivered within a Green Streets approach	Developer/HCC	N/A	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be	These measures are contained within the adopted Mead Lane Urban Design Framework.

					required.	
Transport	Hertford East Station access improvements / new station interchange	Network Rail	Unknown	2022-2027	Unfunded There is not currently any funding arrangements secured for this scheme. However, it is likely that Network Rail would deliver this scheme.	These measures are contained within the adopted Mead Lane Urban Design Framework.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	N/A	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

HERT3: West of Hertford (North of Welwyn Road, and West of Thieves Lane)

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Pedestrian/cycle routes between Hertford West site and Perrett Gardens (North of Welwyn Road site only) and new shared footway/cycleway along Welwyn Road	Developer/HCC	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Transport	Enhanced passenger transport services to include new bus stops on B1000 Welwyn Road	HCC	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

HERT4: North of Hertford

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Utilities	Upgrades to local sewerage infrastructure	Thames Water	Unknown	2017-2022	Funded – Subject to Further Work to Identify Costs The funding of upgrades to the sewerage network must be provided by the developer and Thames Water. A drainage strategy is required in order to identify costings. While potential costs are currently	This item is in response to Thames Water’s representations on the Pre-Submission District Plan which identified that a number of proposed allocations may not have sufficient capacity to cater for development, and therefore upgrades could be required. The details of required work will be dealt with through drainage strategies at the planning application stage. It should be noted that Thames Water has a legal obligation to ensure that developments are served by sufficient infrastructure.

					unknown, there is not a requirement to find alternative sources of funding.	
Transport	Old Cross Junction improvements	HCC	Unknown	2017-2022	Funded/ Partially Funded The developer will make a Section 106 contribution towards this scheme. Whether that amount will be sufficient to deliver the improvements is not currently known. If not, then alternative funding sources will need to be explored. However, the junction is constrained by listed buildings, and as such, options for improvements are likely to be limited.	
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
HERT5: South of Hertford						
Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Upgrade pedestrian and cycle way along Mangrove Road to Simon Balle School and towards the town centre	Developer/HCC	Unknown	2017-2021	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

Appendix D: Sawbridgeworth

Town Wide Infrastructure

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Community Facilities	Possible expansion of health facilities in accordance with CCG requirements	NHS	N/A	N/A	N/A	The Council is currently awaiting comments from the NHS with regards to how capacity should be increased over the Plan period. It is expected that this information will arrive prior to Submission of the District Plan on 31 st March. As such the IDP will be updated again shortly to incorporate this information.
Education	Expansion of Leventhorpe School by 2FE	Leventhorpe School/HCC	£6,500,000	2017-2022	Partially Funded This scheme is being led by Leventhorpe School which is an Academy. The school is funding part of the work itself; however most of the funding would come from other sources subject to a current bidding process. Subject to the outcome of that process, the scheme is considered to be partially funded but this will be kept under review.	
Education	Expansion of Mandeville Primary School by 1FE	HCC	£3,000,000	2017-2022	Partially Funded Development on three sites in the town, comprising 500 dwellings in total, would result in a requirement to deliver 1FE of additional education. Section 106 contributions from these schemes should provide a significant amount of funding – however this is subject to negotiation at the planning application stage.	

SAWB2: Land North of West Road & SAWB3: Land South of West Road

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Utilities	Upgrades to local sewerage infrastructure	Thames Water	Unknown	2017-2022	Funded – Subject to Further Work to Identify Costs The funding of upgrades to the sewerage network must be provided by the developer and Thames Water. A drainage strategy is required in order to identify costings. While potential costs are currently unknown, there is not a requirement to find alternative sources of funding.	This item is in response to Thames Water's representations on the Pre-Submission District Plan which identified that a number of proposed allocations may not have sufficient capacity to cater for development, and therefore upgrades could be required. The details of required work will be dealt with through drainage strategies at the planning application stage. It should be noted that Thames Water has a legal obligation to ensure that developments are served by sufficient infrastructure.
Transport	Footway/cycleway from West Road to Mandeville School and Leventhorpe School (SAWB2 only)	Developer	£30,000	2017-2022	Funded These measures would be delivered by the developer as part of the	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However,

					planning permission. As such no additional funding is expected to be required.	the need for such measures is a requirement within the District Plan policy.
Transport	Footway enhancements along southern side of West Road (SAWB3 only)	HCC	Unknown	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Transport	Signalisation of A1184/West Road/Station Road junction	HCC	£175,000	2017-2022	Funded This scheme will be funded jointly by the two sites.	Site SAWB4 would also be required to provide funding to deliver this scheme if it comes forward for development earlier than 2022-2027 as currently anticipated.
Transport	Signalisation of A1184/High Wych Road junction	HCC	£175,000	2017-2022	Funded This scheme will be funded jointly by the two sites.	Site SAWB4 would also be required to provide funding to deliver this scheme if it comes forward for development earlier than 2022-2027 as currently anticipated.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

SAWB4: Land North of Sawbridgeworth

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Utilities	Upgrades to local sewerage infrastructure	Thames Water	Unknown	2022-2027	Funded – Subject to Further Work to Identify Costs The funding of upgrades to the sewerage network must be provided by the developer and Thames Water. A drainage strategy is required in order to identify costings. While potential costs are currently unknown, there is not a requirement to find alternative sources of funding.	This item is in response to Thames Water's representations on the Pre-Submission District Plan which identified that a number of proposed allocations may not have sufficient capacity to cater for development, and therefore upgrades could be required. The details of required work will be dealt with through drainage strategies at the planning application stage. It should be noted that Thames Water has a legal obligation to ensure that developments are served by sufficient infrastructure.
Transport	Sustainable transport measures that include walking and cycling and enhanced passenger transport services	Developer/HCC	N/A	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space	Developer	N/A	2022-2027	Funded These measures would be delivered	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However,

					by the developer as part of the planning permission. As such no additional funding is expected to be required.	the need for such measures is a requirement within the District Plan policy.
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Appendix E: Ware

WARE2: North and East of Ware

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Spine Road (Widbury Hill to A1170/A10)	Developer/HCC	£6,000,000	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Provision of the Spine Road through the site, connecting to the A10 junction, is essential both in terms of serving the site itself, but also to reduce impact on existing roads.
Transport	Bus Services	HCC	Unknown	2027-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	The cost of extending bus services to serve the site is subject to further discussions with HCC. It is also likely that the services would need to be 'forward funded' by the developer for a period of time until they become self-sufficient in the later development phases.
Transport	Crossing point improvements	Developer/HCC	£30,000	2022-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Rush Green Roundabout Improvements – additional lane on northern slip road approaching roundabout.	HCC	£200,000	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	This scheme will provide some capacity improvements on the roundabout. However, the junction suffers from substantial congestion issues at different time, linked to use of McDonalds and the petrol station. At present, there isn't an identified solution to this wider problem but the Council will continue to work with HCC to consider this issue.
Utilities	New foul sewer	Thames Water	£5,000,000	2022-2037	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	This scheme is essential in order to overcome constraints with the existing sewerage network.
Utilities	Off-site gas upgrades	Utility Company	£450,000 for a 1,000 home scheme £650,000 for a 1,500 home scheme	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Utilities	Off-site electricity upgrades	Utility Company	£375,000 for a 1,000 home scheme £550,000 for a	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no	

			1,500 home scheme		additional funding is expected to be required.	
Utilities	Off-site water connection upgrades	Utility Company	£150,000 for a 1,000 home scheme £250,000 for a 1,500 home scheme	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Education	Primary Education for 2FE school (1,000 homes)with potential to expand to 3FE/expansion of Priors Wood by 1FE (1,500 homes). With Early Years provision.	Developer/HCC	£7,500,000 for 2FE. Further £3,000,000 to deliver additional 1FE	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	The initial 2FE would be delivered on a new primary school site to serve a development of 1,000 homes. Should the additional 500 homes be delivered then a further 1FE would be required. This could be delivered by expanding the new school by 1FE or by expanding the existing Priors Wood Primary School by 1FE.
Education	Nursery facilities	Developer	£3,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Education	New 6FE secondary school with potential to expand to 8FE	Developer/HCC	£20,000,000	2017-2022	Partially Funded The developer will be required to deliver a significant amount of funding towards provision of the school, commensurate with the size of the development (2FE for a 1,000 home scheme or 3FE for a 1,500 home scheme). The proposed developments in Hertford will be expected to provide Section 106 contributions towards this scheme. HCC will consider how any remaining costs should be funded.	Delivery of a new secondary school in this location to meet the needs of the wider Hertford and Ware catchment is the preferred solution. It is recognised that this development will come forward later than developments in Hertford. Therefore the most appropriate solution would be to provide this school site ahead of development of the wider site in order to cater for earlier planned development in Hertford. If this school cannot be delivered earlier, then it is likely that HCC would wish to consider the expansion of one or more existing secondary schools in Hertford. This situation will be kept under review.
Community Facilities	Town centre improvements	TBC	£2,500,000	2027-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	The nature of these improvements will be considered through the planning application process.
Community Facilities	GP surgery	NHS	£2,000,000	2022-2027	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	The size and design of this facility will need to be agreed with the NHS through the masterplanning process.

Community Facilities	Community Centre	Developer	£1,000,000	2022-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Community Facilities/Green Infrastructure	Indoor and outdoor sports facilities (which may be shared use) to include, junior football and mini soccer pitches; and all other green space on site including a cemetery if there is a demonstrable need.	Developer/Sport England	£7,500,000 for a 1,000 home scheme £11,250,000 for a 1,500 home scheme	2022-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Shared footway/cycleway between site, High Oak Road area and Wodson Park	Developer/HCC	£325,000	2022-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.

Appendix F: East of Stevenage

EOS1: East of Stevenage

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	3x roundabouts on Gresley Way for site access	Developer/HCC	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	The provision of cycle-ways and footways that provide links into Stevenage including existing cycle networks	Developer/HCC	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Upgrade to Gresley Way/A602 Junction	HCC	£425,000	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Education	Education provision - 2FE Primary School with Early Years provision	Developer/HCC	£7,500,000	2017-2022	Partially Funded The developer will be required to deliver a significant amount of funding towards provision of the school, commensurate with the size of the development (1.2FE based on 600 dwellings). HCC will consider how any remaining costs should be funded.	In addition to primary education, the developer would be expected to make a Section 106 contribution towards secondary education needs, commensurate to the size of the development. The site forms a relatively small proportion of new development in the Stevenage area which cumulatively leads to a need for a new 6-8FE school. HCC's preference is for this to be provided on the northern edge of Stevenage as part of new development in North Herts District. The Council will continue to work with Stevenage, North Herts and HCC on this issue.
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Community facilities	GP surgery and provision for pharmacy and dentist.	CCG/NHS Provider	Unknown	2017-2022	Partially Funded It is likely that the developer would fund this scheme in its entirety. However, the size of it is subject to discussions with the NHS and the cost is unknown. It is therefore cautiously identified as partially funded at present.	
Utilities	Upgrades to local sewerage infrastructure	Thames Water	Unknown	2017-2022	Funded – Subject to Further Work to	This item is in response to Thames Water's representations

					<p>Identify Costs</p> <p>The funding of upgrades to the sewerage network must be provided by the developer and Thames Water. A drainage strategy is required in order to identify costings. While potential costs are currently unknown, there is not a requirement to find alternative sources of funding.</p>	<p>on the Pre-Submission District Plan which identified that a number of proposed allocations may not have sufficient capacity to cater for development, and therefore upgrades could be required. The details of required work will be dealt with through drainage strategies at the planning application stage. It should be noted that Thames Water has a legal obligation to ensure that developments are served by sufficient infrastructure.</p>
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Appendix G: East of Welwyn Garden City

EWEL1: East of Welwyn Garden City

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Alignment of A414/Holwell Lane roundabout	HCC	£140,000	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	A414/B195 Birchall Lane/ Cole Green Lane Roundabout improvements	Developer/HCC	£2,300,000	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Roundabouts on Birchall/Cole Green Lane for access	Developer/HCC	£850,000	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Enhanced pedestrian and cycle linkages	Developer	N/A	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Utilities	Off-site utilities upgrades	Developer/Service Provider	£4,700,000	2017-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Education	Primary School up to 3FE.	Developer/HCC	Up to £11,000,000 for 3FE	2017 - 2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	The overall development will comprise 2,550 homes with 1,350 in East Herts and the remaining 1,200 in Welwyn Hatfield. In order to meet the needs of the development as a whole, two primary schools will be delivered, one in each administrative area.
Education	Secondary School up to 8FE.	Developer/HCC	Up to £25,000,000 for 8FE	2017 - 2022	Partially Funded The developer will be required to deliver a significant amount of funding towards provision of the school, commensurate with the size	This school will meet the needs of the whole site with the potential to meet some of the wider needs in the Welwyn Garden City area.

					of the development (approximately 5FE based on 2,550 homes). HCC will consider how any remaining costs should be funded.	
Community facilities	Library facilities	Developer/HCC	£300,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Community facilities	GP surgery and provision for pharmacies and dentists.	CCG/NHS/Developer	£3,500,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Community facilities	Community Centre	Developer	£450,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Green Infrastructure	Green Infrastructure, Play areas and public amenity green space.	Developer	£8,000,000	2017-2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy. This will include the formal Country Park which will form the centre of the overall development.
Transport	Improvements to National Cycle Network 61 cycle route into Hertford	HCC	Unknown	2022 onwards	Partially Funded The developer will be required to deliver a Section 106 contribution towards the funding of improvements to the Cole Green Way	The scope of these works is yet to be determined.
Utilities	Upgrades to local sewerage infrastructure	Thames Water	Unknown	2022 onwards	Funded – Subject to Further Work to Identify Costs The funding of upgrades to the sewerage network must be provided by the developer and Thames Water. A drainage strategy is required in order to identify costings. While potential costs are currently unknown, there is not a requirement to find alternative sources of funding.	This item is in response to Thames Water's representations on the Pre-Submission District Plan which identified that a number of proposed allocations may not have sufficient capacity to cater for development, and therefore upgrades could be required. The details of required work will be dealt with through drainage strategies at the planning application stage. It should be noted that Thames Water has a legal obligation to ensure that developments are served by sufficient infrastructure.

Appendix H: Gilston Area (Figures based on the full scheme of 10,000 houses)

GA1: Gilston Area

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	Widening of Central crossing over River Stort from Eastwick Roundabout to Burnt Mill Roundabout.	HCC/ECC	£16,000,000	2022-2027	<p>Funded</p> <p>These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.</p>	<p>The existing crossing will be widened to provide extra capacity in the earlier stages of development. If provided in advance of the Second Crossing, the extra capacity would be for car borne traffic only. Following provision of the Second Crossing, part of the existing crossing could be retro-fitted to facilitate sustainable forms of transport.</p> <p>However, the joint working Councils have an aspiration to deliver the Second Crossing earlier, at the same time as the widened crossing. This would allow provision for sustainable transport on the existing crossing from the earliest stages of development, thus providing a better chance of encouraging residents to use non-car forms of travel.</p> <p>Either way, the sustainable transport element of the existing crossing will form the northern section of the sustainable transport corridor, running from the Gilston Area, through Harlow Town Centre, to potential new development on the southern side of the town within Epping Forest District.</p>
Transport	New Second Stort Crossing to the east of the existing crossing	HCC/ECC	£50,000,000	2027-2033	<p>Funded</p> <p>The provision of this crossing is largely as a result of the Gilston Area development. As such the development would be expected to fund the majority, if not the entirety, of the scheme. Other developments in the Harlow area could be expected to provide contributions to this scheme depending on the timing of their delivery. This issue should be considered as part of the Garden Town bid and the IDP that will be prepared for that area.</p>	<p>An eastern crossing is the preferred option as it would reduce traffic flows on the western section of Edinburgh Way in Harlow. However, if the land required cannot be secured then a second option is to provide a crossing to the west of the existing.</p>
Transport	Hammarskjold/Fifth Avenue/Velizy Avenue 'Longabout'	ECC	£5,000,000	2022 onwards	<p>Funded</p> <p>These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.</p>	
Transport	Second Avenue/Velizy Avenue 'Throughabout'	ECC	£4,000,000	2022 onwards	<p>Funded</p> <p>These measures would be delivered by the developer as part of the planning permission. As such no</p>	

					additional funding is expected to be required.	
Transport	A414 Edinburgh Way/Howard Way improvement scheme	ECC	£5,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	A414 Edinburgh Way/Retail Park junction improvement	ECC	£2,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Amwell Roundabout	HCC	£4,200,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	There is potential to make this junction a 'throughabout' with priority given to traffic using the A414 but this is subject to further transport modelling.
Transport	Access arrangements	Developer/HCC	Unknown	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	There will be four site accesses for the full 10,000 home development. The main access will be off the existing Eastwick roundabout junction with a second on Eastwick Road to access the eastern part of the development. Two further access on the A414 will be located to the west of the existing Stort Crossing.
Transport	Improved access to Harlow Town Station and Adjoining Areas	ECC/HCC	£2,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Pedestrian/Cycle improvements (off site)	HCC/ECC	£1,200,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to enhancements to walking and cycling and other sustainable transport measures will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy.
Utilities	Water infrastructure	Thames Water	£17,500,000	2022	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Note that this figure includes on-site works in addition to off site.
Utilities	Sewerage infrastructure	Thames Water	£17,500,000	2022	Funded	Note that this figure includes on-site works in addition to off site.

					These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Utilities	Electricity Infrastructure	Utility Provider	£29,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Note that this figure includes on-site works in addition to off site.
Utilities	Gas Infrastructure	Utility Provider	£16,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Note that this figure includes on-site works in addition to off site.
Utilities	Telecommunications Infrastructure	Utility Provider	£7,500,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Note that this figure includes on-site works in addition to off site.
Green Infrastructure	Green Infrastructure, Country parks, Play areas, public amenity green space and cemetery if there is a demonstrable need.	Developer	£47,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Detailed design issues such as those related to green infrastructure and open space will be considered at the detailed design stage through a site masterplan. However, the need for such measures is a requirement within the District Plan policy. Much of the green space on the site will be transferred to community ownership through establishment of a Community Trust or equivalent mechanism.
Green Infrastructure	Off site infrastructure	Developer	£5,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	Much of this funding will help deliver significant enhancements to the Stort Valley corridor which is located outside of the development area.
Education	6x Crèche facilities	Developer/Service Provider	£1,100,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Education	5x 3FE Primary School provision	Developer/HCC	£51,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the	

					planning permission. As such no additional funding is expected to be required.	
Education	14 FE Secondary School provision	Developer/HCC	£50,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	This provision is likely to be in the form of two Secondary schools, subject to further discussions with HCC.
Community Facilities	2x Primary Care Health Centres including provision for GP surgeries, pharmacies and dentists.	Developer/NHS	£18,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	The nature of these facilities is subject to further advice from the NHS.
Community Facilities	Community Centres	Developer	£4,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Community Facilities	Libraries	Developer/HCC	£1,000,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Community Facilities	Police Station	Developer/Hertfordshire Constabulary	£500,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Community Facilities	Places of worship	Developer/Service Provider	£1,500,000	2022 onwards	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Transport	Bus Services	Developer/HCC	£7,000,000	2022-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Waste	On site and waste/recycling sorting facilities	Developer	£2,500,000	2022 onwards	Funded	

Management					These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	
Community Facilities	Public Art	Developer	£3,000,000	2022-2033	Funded These measures would be delivered by the developer as part of the planning permission. As such no additional funding is expected to be required.	

Appendix I: Strategic Infrastructure

Infrastructure Type	Description	Lead Agencies	Estimated Cost	Phasing	Funding	Notes
Transport	A602 capacity and traffic flow upgrades	HCC	£19,400,000	Complete by 2019.	Funded Hertfordshire LEP and HCC	Works will be undertaken in the following locations: <ul style="list-style-type: none"> • Hertford Road Junction • A119 roundabout • Ware Road • Sacombe Pound Junction • Stony Hills Junction • Anchor Lane roundabout • Westmill Road • A10 Junction
Transport	A1(M) Junction 4 – ‘Jack Oldings’ roundabout	Highways England/HCC	£250,000,000	Unknown	Unfunded There is currently no funding agreed for this scheme.	The nature of these works is at present unknown. The need for improvements is identified within HCC’s 2050 Transport Vision document.
Transport	M11 Junction 7a including widening of Gilden Way.	Highways England/ECC	£45,000,000	By 2021	Funded Up to £42,000,000 from Road Investment Strategy Funding. The remainder will be forward funded by Essex County Council and then returned to them through Section 106 contributions as development comes forward.	The money from Road Investment Strategy 1 was originally identified for upgrades to Junction 7. However, a new Junction 7a was seen by ECC as a more beneficial priority and so a switch was confirmed in late 2016. ECC is currently investigating the potential to implement interim capacity improvements at Junction 7 which would provide 5 to 10 years of future capacity. Road Investment Strategy 2 or 3 funding could then be used to deliver a more comprehensive scheme later in the Plan period.
Transport	M11 Junction 7	Highways England/ECC	£34,000,000	2022-2033	Unfunded There is currently no funding agreed for this scheme.	
Transport	M11 Junction 8 (Interim Option)	Highways England/ECC	£13,000,000	2022-2027	Partially Funded £1,000,000 secured from Greater Cambs/Greater Peterborough LEP. A bid has been made for Road Investment Strategy 2 funding. In addition bids for money from the Highways England Growth and Housing Fund and the Local Growth Fund Round 3 (through the South East LEP) have made it successfully through the first assessment stage.	ECC has submitted feedback to Highways England’s Route Strategies, which will be the foundation of Highways England’s first ‘Strategic Road Network Initial Report’ to be submitted to Government in 2017 and will inform the need for a strategic intervention at Junction 8 to Road Investment Strategy 2 (RIS2).
Transport	M11 Junction 8 (Full Option)	Highways England/ECC	Unknown	2027 onwards	Unfunded There is currently no funding agreed for this scheme.	
Transport	Little Hadham Bypass	HCC	£30,000,000	By 2019	Funded £27,400,000 has been provided by the Hertfordshire LEP with the remainder largely being provided by the	

					Environment Agency in relation to the flood alleviation scheme.	
Transport	Hertford Strategic Solution	HCC	£155,000,000 - £175,000,00	By 2024	Unfunded There is currently no funding agreed for this scheme.	This is most likely to be in the form of a bypass.
Transport	Further mitigation in Harlow area including a potential Harlow Northern Bypass	ECC	£200,000,000	Post 2033	Unfunded There is currently no funding agreed for this scheme.	The mitigation measures to deliver around 16,000 homes by 2033 in the Harlow area (including 3,000 at Gilston Area) are known. In order to deliver the rest of the Gilston Area development beyond the Plan period, it is likely that further schemes will be needed. This is subject to future transport modelling work by HCC and ECC.
Transport	M25 Junction 25 capacity improvements	Highways England	£23,000,000 - £27,000,000	By 2022/2023	Funded Funding has been secured through the Road Investment Strategy 1 programme.	Two options have been consulted on by Highways England. Both would add extra lanes to the roundabout and the A10 southbound approach would be widened. The more expensive option would also add a dedicated free flow left turn to join the A10 northbound.
Utilities	Rye Meads Sewage Treatment Upgrades	Thames Water	Unknown	2024 onwards	Unfunded The cost of any upgrade works is unknown. However, Thames Water will identify works and costings through its standard future planning procedures.	Rye Meads STW serves a large catchment. Thames Water has recently advised that it has capacity to around 2024, although this is regarded as a worst case scenario.
Health	Relocation of Princess Alexandra Hospital	PAH	Unknown	2025 onwards	Unfunded There is currently no funding agreed for this scheme. The hospital is preparing a Strategic Outline Case in order to seek Government funding.	The existing hospital site is extremely constrained and the preferred approach of the Hospital Trust is to relocate to a new site on the edge of the town. A high level study has identified that land to the north or east of Harlow could be suitable. This issue is being progressed by the joint working local authorities and the hospital through the Co-operation for Sustainable Development Board. There is potential for a new site to deliver a 'health campus' incorporating a range of medical services. Timescales for potential delivery of a relocated facility are relatively significant. At present, a Strategic Outline Case is being prepared by the hospital in order to seek the necessary funding from Government. It is likely that a decision on this would be made in 4 – 6 months' time. This would be followed by an Outline Business Case which could take a further 4 months before a Full Business Case is put to Government. Overall, timescales for delivery are likely to be 8 years plus.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 9 MARCH 2017

REPORT BY LEADER OF THE COUNCIL

TRANSPORT MODELLING: COMET AND VISUM TECHNICAL PAPERS

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To agree the COMET Technical Paper, January 2017, as part of the evidence base to support the East Herts District Plan; and
- To note the main outputs of VISUM modelling.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That Council, via the Executive, be advised that:	
(A)	the COMET Technical Paper, January 2017, be agreed as part of the evidence base to support the East Herts District Plan;
(B)	the outputs of VISUM modelling be noted;
(C)	the Head of Planning and Building Control, in consultation with the Leader of the Council, be authorised to agree the VISUM Technical Paper prior to the submission of the District Plan to the Planning Inspectorate; and
(D)	further transport modelling will be undertaken prior to the District Plan Examination Hearing Sessions.

1.0 Background

1.1 Transport modelling forms an integral part of the evidence base in support of local plan preparation. The development strategy contained within the East Herts District Plan has been shaped by ongoing advice from both Hertfordshire County Council and Essex County Council in respect of highway capacity issues.

1.2 Each of the County Councils has prepared a strategic transport model in order to consider the impact of proposed growth on the highway network, and subsequently, to identify mitigation measures that can alleviate any issues that are identified.

1.3 This report presents outputs in relation to both transport models.

2.0 Report

Hertfordshire County Council – COMET Model

2.1 Hertfordshire County Council has produced a transport model known as COMET. The model takes account of proposed growth within each of the ten boroughs and districts in Hertfordshire up to 2031. However, the model does not take account of identified development locations outside of Hertfordshire, and instead uses growth projections made by the Government's Department for Transport. These projections may not fully reflect the level of growth that is being proposed within neighbouring areas, but do serve to provide an indication of potential impact.

2.2 The County Council has planned to carry out two runs of the model in support of local plan making, which have both now been undertaken. The first run takes account of all proposed growth, but only assumes that currently permitted highway schemes, or those that are highly likely to be permitted in due course, will take place in order to mitigate the impact. A full list of schemes is included on Page 14 of the technical paper. In addition, a small number of other highway works linked to some of the very large strategic sites are also taken account of; i.e. access to the Gilston Area development and the proposed link road that will be provided as part of development to the North and East of Ware.

2.3 The purpose of this initial model run is to identify where stresses on the highway network are likely to be experienced as a result of proposed growth. These outputs can then be used in order to identify where further mitigation measures will be required.

2.4 The technical paper, which forms **Essential Reference Paper B** to this report, focuses on the outputs of the initial run that are relevant to East Herts. In particular, it identifies potential impacts on twelve specific junctions within East Herts. These are identified in Table 2 on Page 16 of the technical paper. In addition to these

junctions, an analysis has also made in relation to the five largest proposed development locations in the District: Gilston Area, Bishop's Stortford South, North and East of Ware, East of Stevenage and East of Welwyn Garden City.

- 2.5 The technical paper identifies areas on the highway network where greater delays will be experienced at peak times. It also provides a summary of potential mitigation options. This technical work has informed a second run of the COMET model which takes account of further identified mitigation measures. The reporting of the outcomes of this work at both countywide and district specific levels is currently ongoing and, as such, will be presented to a future meeting of this Panel.
- 2.6 In respect of the reporting of the first stage initial COMET run, it should be noted that the East Herts specific technical paper includes an assessment of likely impacts of growth in relation to the three Air Quality Management Areas (AQMA's) that currently exist in East Herts. This analysis is presented on Page 30.
- 2.7 Furthermore, the outcomes of the initial COMET model run have informed the content of the representations made by Hertfordshire County Council on the Pre-Submission version of the District Plan in respect of potential impact for East Herts. In this respect, the County Council is generally satisfied with the approach taken by East Herts in relation to the proposed locations for growth, and in transport terms considers the Plan to be 'sound' and, therefore, fit for purpose.
- 2.8 In addition to informing local plan making in Hertfordshire, the results of the COMET modelling will also inform the County Council's 2050 Transport Vision and the subsequent Local Transport Plan 4 (LTP4). The final version of LTP4 will include strategic schemes which would be anticipated to be delivered within the lifespan of that Plan (e.g. a strategic solution to the A414 congestion issue in Hertford). Public consultation on a draft LTP4 is expected later this year.

Essex County Council – VISUM Model

- 2.9 Essex County Council has also prepared a strategic transport model known as VISUM which covers the wider Harlow area. Within East Herts, the model assesses future highway capacity in Bishop's Stortford and Sawbridgeworth, as well as the area to the immediate north of Harlow within which the proposed Gilston Area

allocation is located. Unlike COMET, this model does take into account proposed growth in adjoining areas, including development in East Herts. As a result, the VISUM model is likely to provide a more accurate assessment of the impacts of growth on the eastern side of East Herts than the COMET model.

- 2.10 There are three Technical Papers currently in preparation which will be completed prior to submission of the District Plan to the Planning Inspectorate on 31st March 2017. The three Papers will set out the following:
- How the VISUM model has been prepared, and the inputs and assumptions that have informed it;
 - The outputs arising from the modelling work; and
 - A consideration of the need for a Second Stort Crossing and the potential for a Harlow Northern Bypass.
- 2.11 The three Papers are still in preparation and have not yet been agreed for publication by Essex County Council. As such, they cannot be presented as part of this Panel report. However, ahead of the Papers being agreed, this report identifies the main outputs from the first two Technical Papers. The outputs of the third Paper, concerning the Stort Crossing and Harlow Northern Bypass, are still emerging and are therefore not presented within this report. However, they will be presented as part of a verbal update at the Panel meeting.

Technical Paper 1: Forecast Methodology Report

- 2.12 The VISUM model covers the period 2014 to 2033 in order to align itself as far as possible with the local plan time horizons of East Herts, Harlow, Epping Forest and Uttlesford District Councils which run from 2011 until 2033. For the period 2011 to 2014, housing completions data provided by the respective local authorities has been utilised.
- 2.13 In order to assess the high level impacts of growth on the highway network in a manageable way, the model focuses on three specific time periods: the morning peak hour (8am to 9am), the inter-peak period (11am to 12pm) and the evening peak hour (5pm to 6pm).
- 2.14 In addition to proposed growth in the wider Harlow area, the model includes future highways mitigation schemes which are considered highly likely to be delivered. Of particular note is the inclusion of a new M11 Junction 7a, capacity improvements to

M11 Junctions 7 and 8, the A120 Little Hadham Bypass, widening of the existing Stort Crossing between the Eastwick and Burnt Mill roundabouts and signalisation of the A1184/West Rd/Station Rd junction in Sawbridgeworth.

2.15 In addition to planned development, the model also considers the following information which can affect the number of car trips made:

- Background growth (changes in car ownership levels, population growth, changes in propensity to travel due to factors such as car and fuel cost);
- Growth in passenger numbers using Stansted Airport; and
- School demand growth.

2.16 In order to help inform local plan making, the model assessed five different spatial options which were based on different levels of housing growth within the Harlow area. These options, which were originally identified through the Sustainability Appraisal of Strategic Spatial Options work (presented to Panel on 13th October 2016), are presented in Table 1 below.

District/Area	Option A	Option B	Option C	Option D	Option E
East Herts	15,195	13,695	16,695	14,745	16,795
Epping Forest	8,731	6,581	6,581	7,952	10,631
Harlow	7,216	7,216	7,216	7,216	7,216
Uttlesford	9,763	13,263	9,763	9,433	9,763
Total	40,905	40,755	40,255	39,346	44,405
Wider Harlow Area Total	13,466	9,816	9,816	16,966	16,966

Table 1: Options modelled by VISUM (housing completions)

2.17 With regards to East Herts, one of the most significant variables between the five options was the level of growth proposed within the Gilston Area by 2033. This varied as follows:

- Option A – 2,750 homes
- Option B – 1,250 homes
- Option C – 1,250 homes
- Option D – 4,350 homes
- Option E – 4,350 homes

2.18 The different options also assessed different levels of growth in

other strategic locations in the Harlow area, outside of East Herts District.

- 2.19 Employment growth was also considered through the model. The inputs in this regard were largely based on the East of England Forecasting Model (EEFM), along with proposed employment locations contained within the respective emerging local plans. The jobs forecasts incorporated within VISUM are identified within Table 2 below.

District/Area	Option A	Option B	Option C	Option D	Option E
East Herts	2,847	2,847	2,847	1,484	2,847
Epping Forest	7,272	5,151	4,436	7,336	8,500
Harlow	8,531	8,531	8,531	8,531	8,531
Uttlesford	14,143	14,143	14,143	14,143	14,143
Total	32,793	30,672	29,957	31,493	34,020
Wider Harlow Area Total	14,639	12,518	11,803	15,867	15,867

Table 2: Options modelled by VISUM (job numbers)

- 2.20 Having identified the inputs for the VISUM model, the second Technical Paper explains the outputs.

Technical Paper 2: Spatial Options A to E

- 2.21 In terms of the number of car journeys, the model shows that there would be an increase of approximately 37% in the AM and PM peaks when comparing the base year (2014) to the end date (2033).
- 2.22 Average speeds across the modelled area are forecast to drop by between 13% and 17% depending on which of the five spatial options is considered. However, the main impacts on average speed are forecast to occur within Harlow. Within the Bishop's Stortford and Sawbridgeworth area, speeds are forecast to reduce by between 1% and 6% in the AM Peak and between 0% and 3% in the PM Peak.
- 2.23 In seeking to assess the differences between the five spatial options, the VISUM model observes differences in journey times in the AM Peak for six routes in the Harlow area. These are as follows:

- 1) A414 Eastwick Road to Junction 7 M11 via A414 Edinburgh Way;
- 2) A414 Eastwick Road to Junction 7 M11 via A1019 and A1025;
- 3) The Pinnacles to Hatfield Heath via Fourth Avenue, First Avenue and B183;
- 4) Bishop's Stortford South to Junction 7 M11 via A1184 and A414;
- 5) Nazeing Common to A414 via A1025; and
- 6) Burnt Mill to A414 via Elizabeth Way and A1169.

2.24 From an East Herts perspective, the most relevant analyses are those related to Journeys 1, 2 and 4.

2.25 For Journey 1, the difference in time when compared to the base year of 2014 (9.6 minutes) varies from an additional 3.3 minutes to 5.2 minutes depending on which of the five spatial options is observed. Options D and E show increases at the top end of that scale, while Option B, which takes account of the lowest amount of development at the Gilston Area, shows the smallest increase. Option A which includes 2,750 homes in the Gilston Area (the figure closest to that identified within the District Plan), shows an increase in journey time of 3.9 minutes.

2.26 When taking the journey in the opposite direction (Junction 7 M11 to Eastwick Road), the difference in time compared to the base year (10.6 minutes) increases between 5.2 minutes (Option A) and 9.6 minutes (Option D).

2.27 For Journey 2, when compared to the base year (9.0 minutes), there is an observed increase of between 2.8 and 4.0 minutes. Option A shows an increase of 3.3 minutes.

2.28 Again, when taking the journey in the opposite direction, the increase in time on the base year (10.8 minutes) is between 4.0 minutes (Option A) and 6.3 minutes (Option D).

2.29 With regards to Journey 4 (Bishop's Stortford South to M11 Junction 7), the base year journey time was 17.3 minutes. It should be noted that there is already considerable congestion and delay on this route in peak periods. According to the model, the journey time will increase by between 1.8 minutes (Option A) and 4.9 minutes (Option E).

2.30 In the opposite direction, the base year journey time (16.6

minutes) is forecast to increase by between 2.7 minutes (Option C) and 4.9 minutes (Option D). Option A shows an increase of 2.8 minutes.

2.31 It should be noted that this iteration of the VISUM modelling did not take account of the provision of a Second Stort Crossing. The impact of this is considered as part of the third Technical Paper.

2.32 Overall, when considering the impacts of growth on the highway network in the wider Harlow area, Option A is observed to have the least impact despite not being the lowest growth option. This is likely to be because this option includes strategic growth spread fairly evenly around Harlow. Options D and E, which are both 'high growth' options, are shown to have the greatest impacts on network speeds.

2.33 In general terms, the modelling shows that the following junctions/locations in the Harlow area experience greater stress as a result of growth, and therefore that additional mitigation may be required:

- Edinburgh Way/Howard Way junction in Harlow (including adjacent Retail Park access);
- A414/B183 First Avenue junction in Harlow;
- Howard Way/Tillwicks Road and Manston Way/Tripton Road junctions in Harlow;
- B183 Gilden Way in Harlow;
- A1169/A1025 Third Avenue Corridor in Harlow
- The A1184 corridor in East Herts.

2.34 It is likely that further VISUM modelling will be required as the respective local authorities progress their local plans. However, it should be noted that the current outputs have informed the content of the representations made by Essex County Council on the Pre-Submission version of the District Plan. In this respect, the County Council is generally satisfied with the approach taken by East Herts in relation to the proposed locations for growth, and in transport terms considers the Plan to be 'sound' and, therefore, fit for purpose.

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 Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area 2016:

<http://www.eastherts.gov.uk/technicalstudies>

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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:	No
Legal:	There are no direct legal implications arising from this report.
Financial:	There are no direct financial implications arising from this report for the Council. The cost of preparing a District Plan is significant and has been budgeted over the duration of its preparation.
Human Resource:	Staff resource is in place to ensure the ongoing timely preparation of the District Plan.
Risk Management:	Transport Modelling forms a key part of the evidence base underpinning the District Plan. As such, not having this evidence in place is likely to lead to the District Plan being found 'unsound' at Examination.
Health and wellbeing – issues and impacts:	The 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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East Hertfordshire Local Plan Support

Client name East Hertfordshire Council	Date January 2017	Project number 60522529	Project name East Hertfordshire Local Plan Support
Prepared by: JL	Checked by: SK	Approved by: IB	

Revision	Revision date	Prepared by	Checked by
1: Draft for client comment (v1)	8 th December 2016	JL	SK
2: Final (v1.a)	10 th January 2017	JL	SK
3: Final (v1.b)	16 th January 2017	JL	SK

1. Introduction

1.1 Task Objective

- 1.1.1 In October 2016, AECOM was commissioned by East Hertfordshire Council (EHC) to provide support for its upcoming Local Plan submission in March 2017. The support is in relation to the district's highway network performance and covers an analysis of conditions in the present day¹ and 2031, estimated using a strategic transport model.
- 1.1.2 Hertfordshire County Council's (HCC) existing 2014 Base Year and 2031 Forecast Year COMET models (version 2, October 2016) have been used to inform this work. The 2031 Forecast includes Local Plan growth from all 10 Hertfordshire districts as well as the most significant committed/very likely planned transport infrastructure changes (see section 4.1.2 for a list of schemes). Although COMET is a multi-modal model, the focus of this work is on the interpretation of highway assignment results.

1.2 Caveats

- 1.2.1 COMET is a strategic countywide model and has not been developed specifically to represent traffic conditions in urban areas. The model has not been validated in urban areas located in East Hertfordshire. The model's main purpose is to simulate inter-urban movements in Hertfordshire, and the calibration/validation process has been conducted accordingly. This has an implication on the level of confidence that can be placed on results in urban areas of East Hertfordshire.
- 1.2.2 The highway assignment component of the COMET model suite is in SATURN. SATURN is a tool that suits the strategic geographical scale of COMET, however, does not enable investigation of detailed sections of the highway network (e.g. detailed junction or corridor assessment). At this stage, therefore, the results presented here should be interpreted as high level indications of likely traffic conditions.

¹ 2014 Base Year Model
AECOM

1.3 Structure of this note

1.3.1 This note is presented in the following sections:

- Review of Base Year (2014) Model Performance
- Review of Base Year (2014) Traffic Conditions
- Review of Forecast Year (2031) Traffic Conditions
- Proposed Major East Hertfordshire Developments
- Potential Mitigation Options
- Air Quality Management Areas
- Summary and Next Steps
- Appendices
 - Appendix A – Journey Time Validation Results
 - Appendix B – GEH Results
 - Appendix C – Town Based Trip Distribution Plots
 - Appendix D – A414 Hertford Corridor Analysis
 - Appendix E – Glossary of Terms

2. Review of Base Year (2014) Model Performance

2.1.1 This section of the document summarises the performance (i.e. representativeness) of the COMET highway assignment model in East Hertfordshire according to Department for Transport WebTAG (Transport Analysis Guidance) criteria. The performance indicators provided are those that were defined during the model development process, and are categorised as follows:

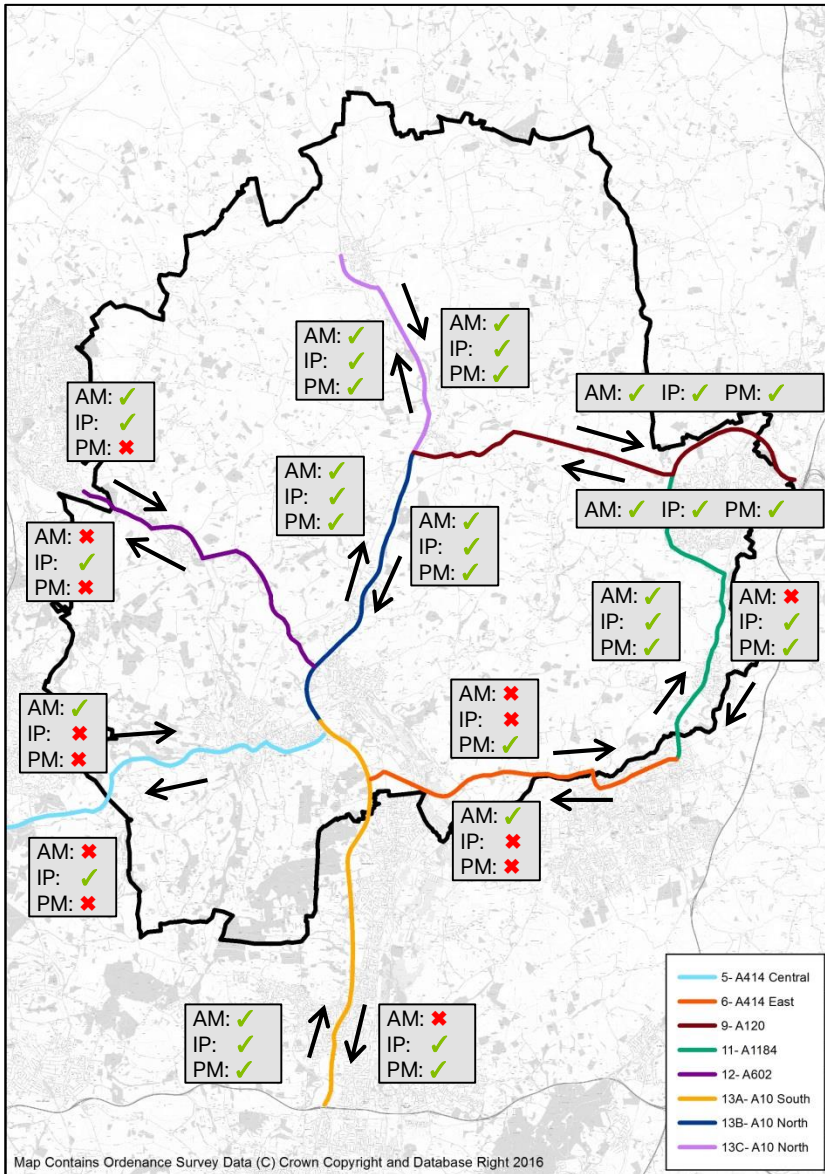
- Journey Time Validation Routes
- Screenlines and Cordons Validation
- Link flow Validation
- Town Based Trip Distribution Plots (not strictly an indication of model performance, however illustrates the strategic travel patterns)

2.2 Journey Time Validation Routes

2.2.1 During the development of COMET, eight journey time routes in East Hertfordshire were defined for the purpose of model validation, as shown in Figure 1. Journey times along these routes are compared between the model and observed data (TrafficMaster journey time data).

2.2.2 WebTAG recommends that modelled and observed journey times should be within 15% (or within 1 minute, if higher than 15%)². The diagram below has been annotated according to whether the journey time route meets this criterion. Full results for the journey time validation routes are provided in Table 5 (see appendix).

Figure 1. COMET Journey Time Validation Routes in East Hertfordshire³



2.2.3 In both the AM Peak (8am-9am) and PM Peak (5pm-6pm), the model represents journey times on approximately 70% of the defined routes in East Hertfordshire according to WebTAG criteria. The strongest validation results across all time periods are on the A120 between the M11 and A10, all sections of the A10, and A1184 south of Bishop’s Stortford.

2.2.4 The model’s performance on the A414 (both sides of the A10) and on the A602 generally does not meet WebTAG criteria:

- A414 west of the A10 – the model over-represents delay in both directions in the PM Peak, and under-represents delay in the westbound direction in the AM Peak. The representation of the eastbound movement in the AM Peak is WebTAG compliant.
- A414 east of the A10 – the model the model under-represents delay in the eastbound direction in the AM Peak, and in the westbound direction in the PM Peak. The AM Peak and PM Peak results for the opposite directions, respectively, are WebTAG compliant.
- A602 – the model under-represents westbound delay in both peak hours, and over-represents eastbound delay in the PM Peak. The AM Peak eastbound movement is WebTAG compliant.

³ IP (inter-peak) results are given for information only.

2.2.5 These results should be considered alongside any analysis regarding the likely scale of change in corridor level delay.

2.3 Screenlines and Cordons Validation

2.3.1 A further measure of model performance is the extent to which it represents the volume of traffic into/out of towns (cordons), and the volume of traffic across imaginary screenlines. WebTAG recommends that the difference between modelled and observed flow across screenlines and cordons should be less than 5%⁴.

2.3.2 Figure 2 and Figure 3 show the locations of the screenlines and cordons in East Hertfordshire, and also indicate (by colour coding) the difference between modelled and observed flow. In both time periods, the Bishop’s Stortford cordon represents outbound flow (inner circle in diagram) and inbound flow (outer circle in diagram) within WebTAG guidelines. The model performance in Hertford is also generally in accordance with the guidelines, however, the outbound flow in the AM Peak is underrepresented in the model by 10%-15%.

2.3.3 Although outside East Hertfordshire district, the cordon covering Hoddesdon/Broxbourne/Cheshunt also shows good results, suggesting that the interaction into/out of this section of the A10 corridor is well represented.

2.3.4 The east/west screenline in the northern part of the district (running broadly parallel to the A120) indicates that the north/south movements it covers (including those on the A10) are well represented by COMET.

2.3.5 The following screenlines do not consistently meet WebTAG guidelines:

- North/south screenline at the western edge of the district
- East/west screenline at the southern edge of the district

2.3.6 It should be noted, however, that both of these screenlines are among the longest in the whole modelled area. The more local performance of these screenlines (within East Hertfordshire) is provided in Table 1, and shows that the performance in East Hertfordshire is generally further from WebTAG guidelines than the screenline as a whole. This represents a potential weakness in the representation of trips crossing these screenlines into and out of the East Herts district.

Table 1. Local Screenline Performance

Screenline	Direction	Peak Hour	Performance across entire screenline	Performance within East Hertfordshire
North/south screenline at the western edge of the district	Eastbound	AM	+16% (over-representation)	+11% (over-representation)
		PM	+17% (over-representation)	+23% (over-representation)
	Westbound	AM	WebTAG compliant (<5% difference)	+7% (over-representation)
		PM	WebTAG compliant (<5% difference)	+9% (over-representation)
East/west screenline at the southern edge of the district	Northbound	AM	-12% (under-representation)	-12% (under-representation)
		PM	-10% (under-representation)	-10% (under-representation)
	Southbound	AM	WebTAG compliant (<5% difference)	-6% (under-representation)
		PM	-7% (under-representation)	WebTAG compliant (<5% difference)

Figure 2. AM Peak Cordon & Screenline Results

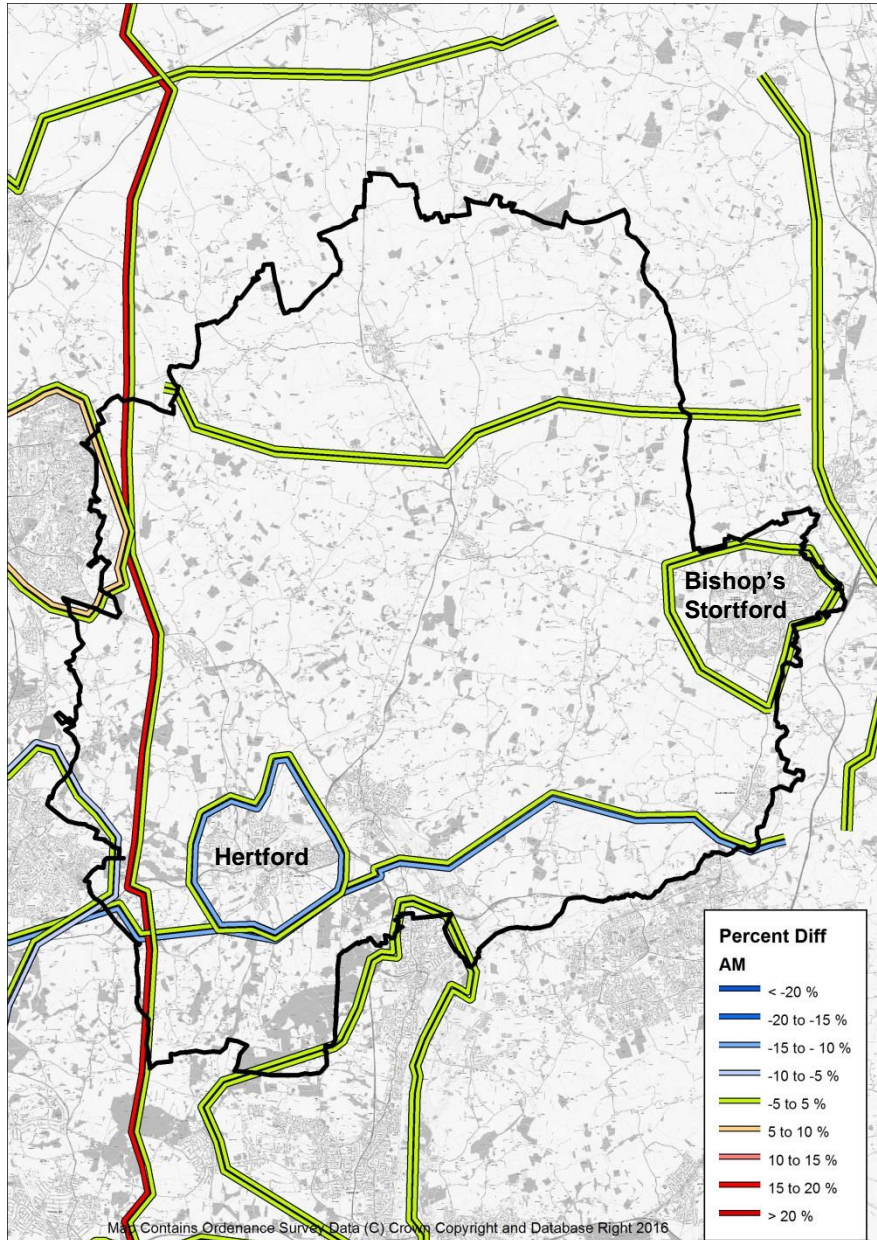
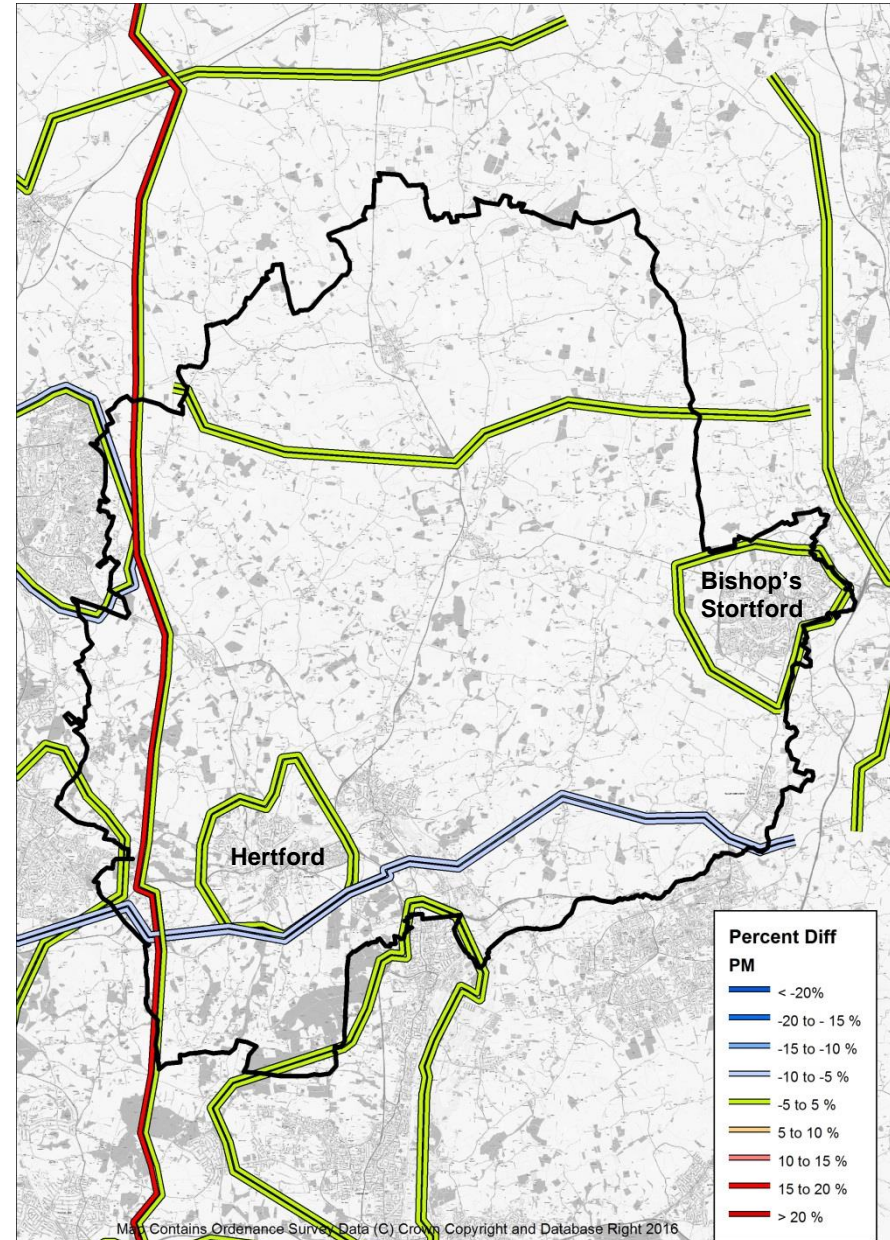


Figure 3. PM Peak Cordon & Screenline Results



2.4 Link Flow Validation

2.4.1 This section presents the validation results of the COMET highway assignment model according to the GEH statistic⁵. According to WebTAG criteria, the GEH value for individual model links should be less than 5.

2.4.2 Figure 4 and Figure 5 show the results of each link for which observed vehicle flow data is available. Links coloured green are those where traffic volumes are accurately represented by the model, whereas red links are furthest from meeting the criteria. See appendix (Table 6) for full GEH results.

2.4.3 At a district level, the GEH performance of the model in East Hertfordshire is mixed. The performance on the following radial routes around Bishop's Stortford generally meets or is close to meeting GEH values of 5 in both time periods:

- A120 to the west, north and east of the town
- Rye St (B1004) and Stansted Rd (B1383) north of the town
- Great Hadham Rd (B1004) to the southwest of the town
- Hallingbury Rd (A1060) south of the town

2.4.4 Weaknesses in model performance around Bishop's Stortford exist on the A1184 south of the town (particularly in the PM Peak), and on Pig Ln.

2.4.5 The performance of the model around Hertford is generally further from WebTAG guidelines, however, does represent vehicle volumes according to WebTAG criteria on the following key links:

- A414 east and west of the town
- A10 east of the town
- North Rd (A119) north of the town
- Bramfield Rd northwest of the town

2.5 Model Suitability

2.5.1 COMET has been developed in line with latest WebTAG guidance, however, (as raised in the preceding sections) there are performance limitations which have an implication on the level of confidence that can be placed in the model results.

2.5.2 Notwithstanding these limitations, COMET is deemed an appropriate tool for representing broad strategic movements, and is therefore considered suitable for assessing the Local Plan at a very high level.

⁵ GEH compares the modelled flow versus observed flow, and is defined in section 3.2.7 of WebTAG Unit M3.1 – Highway Assignment Modelling.

Figure 4. AM Peak GEH Results

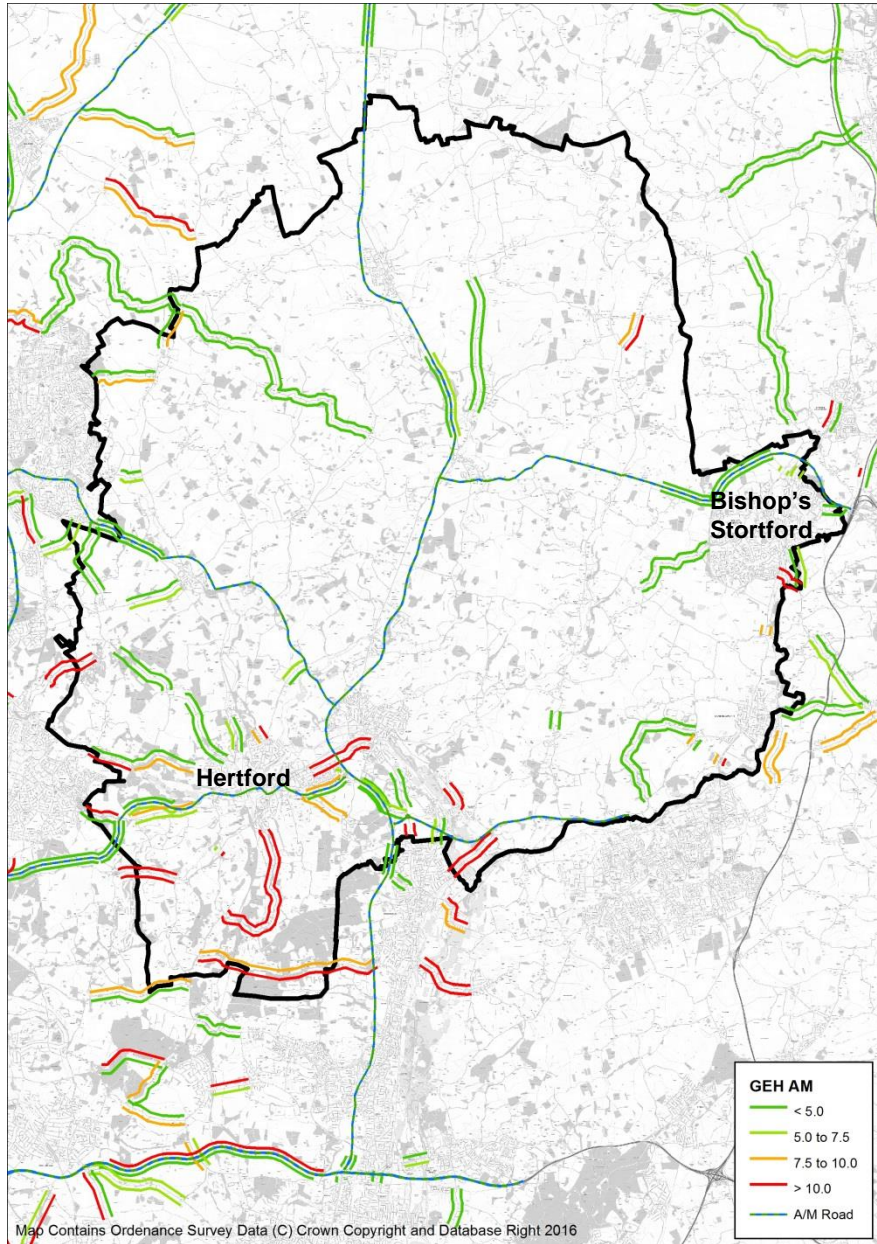
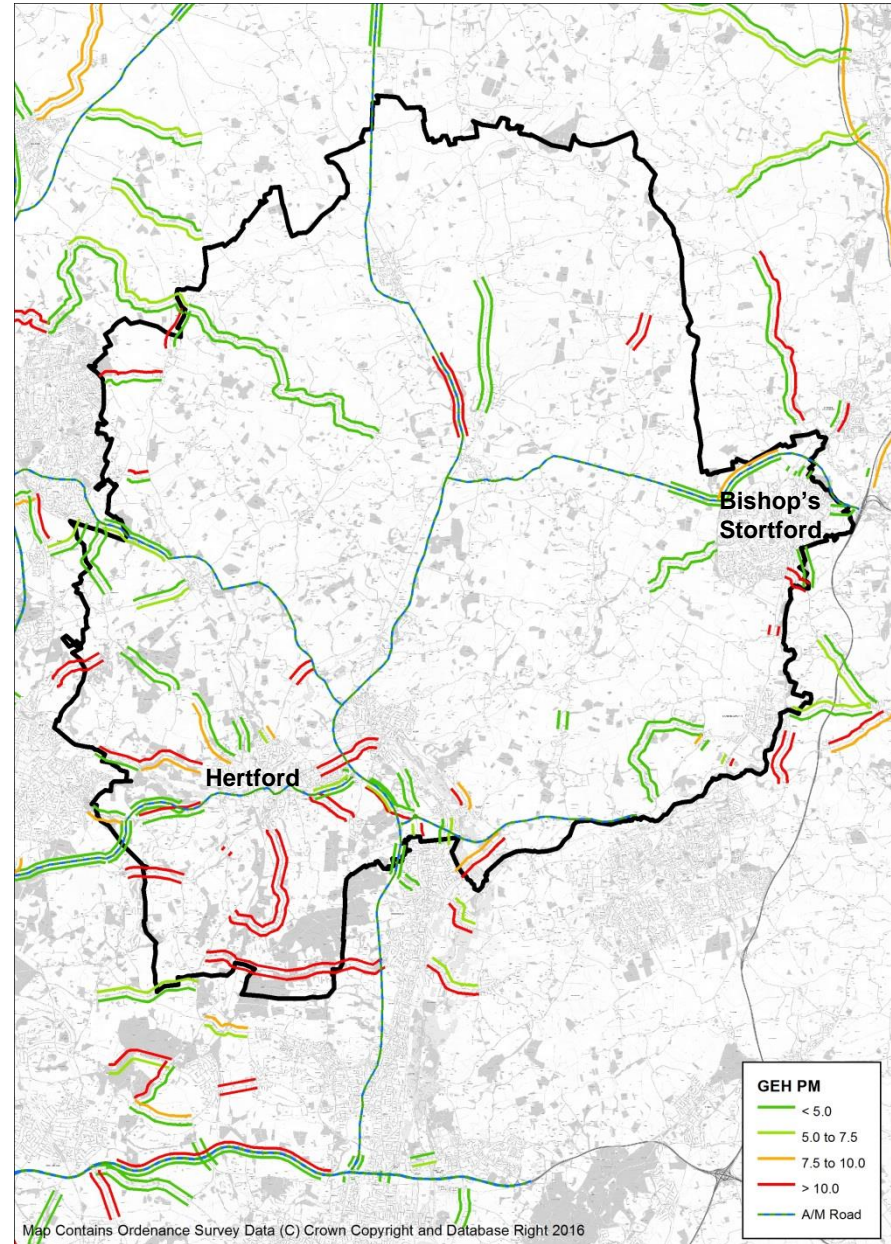


Figure 5. PM Peak GEH Results



2.6 Town Based Trip Distribution Plots: Base Year (2014)

- 2.6.1 Trip distribution plots are provided in this section to illustrate the origins, destinations and route choices of trips in the model to/from Bishop's Stortford and Hertford. Plots showing AM trips *to towns* and PM trips *from towns* have been provided in this section as they provide an indication of to work/from work travel patterns for Hertford and Bishop's Stortford⁶.
- 2.6.2 Figure 6 and Figure 7 show the AM Peak inbound trips and PM Peak outbound trips for Bishop's Stortford, respectively. These plots indicate that town has a close interaction with the A120 (towards Essex) and M11 corridors, and that the interaction with the rest of the district is relatively limited. There are a comparatively low number of trips between Bishop's Stortford and the rest of Hertfordshire. Where this interaction exists, it is primarily via the A120 and A414 towards the A10 and A1(M) corridors.
- 2.6.3 Figure 8 and Figure 9 show the equivalent diagrams for Hertford. The high levels of through-traffic through Hertford clearly constitute a significant proportion of the illustrated flow. Unlike Bishop's Stortford, a close interaction is visible between other towns in Hertfordshire including Welwyn Garden City, Ware, Hatfield, Stevenage and St Albans. These trips rely principally on the strategic A414, A602, A10 and A1(M).

⁶ Figure 32, Figure 33, Figure 34 and Figure 35 (see appendix) contain the remaining town based trip distribution plots.

Figure 6. AM Peak Inbound trips to Bishop's Stortford⁷

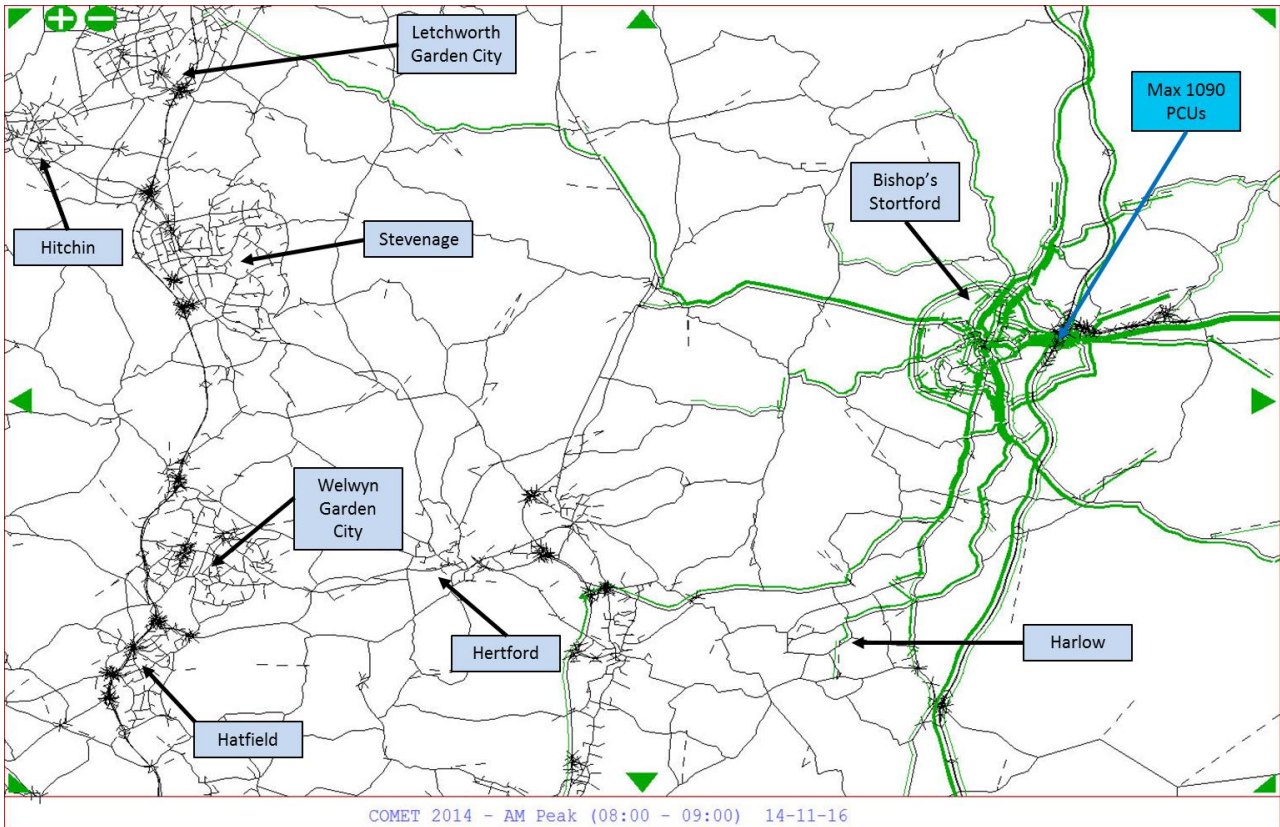
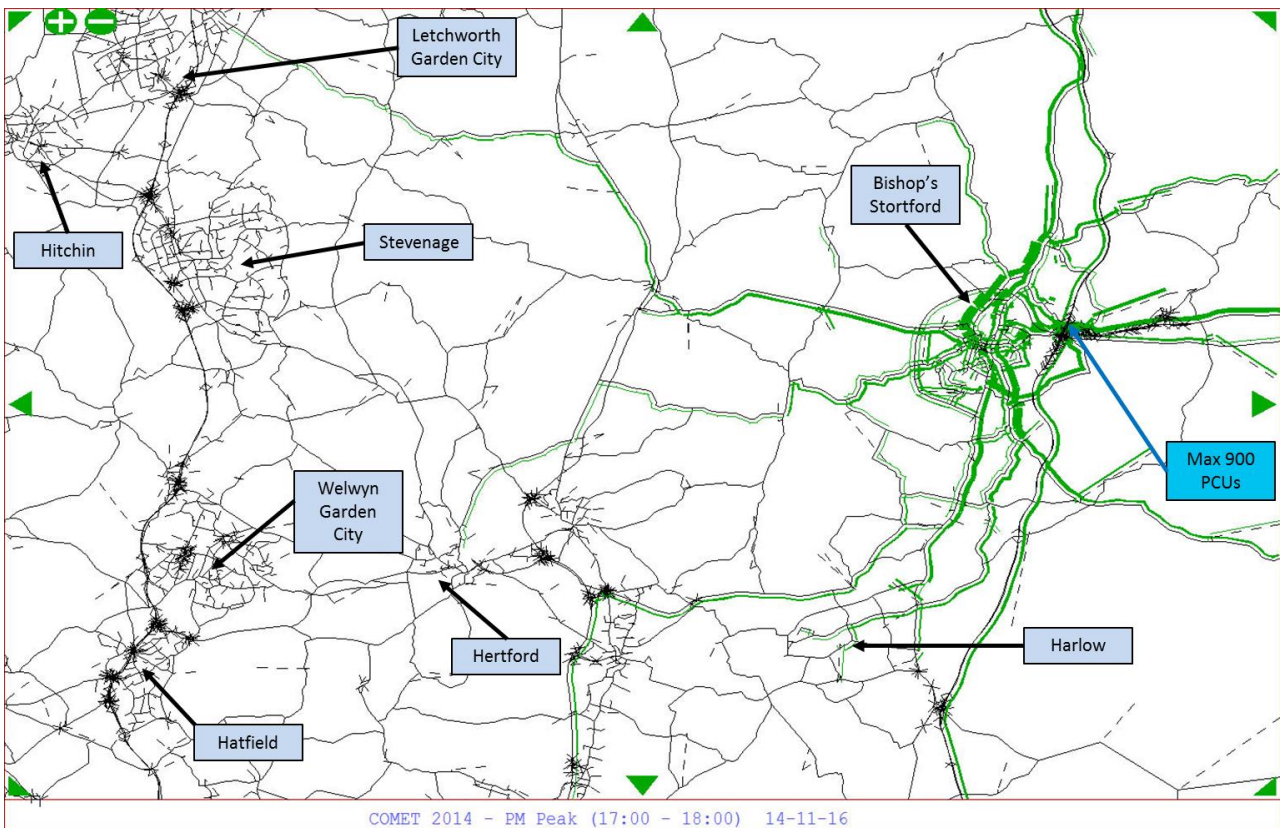


Figure 7. PM Peak Outbound trips from Bishop's Stortford⁷



⁷ Units are PCUs (Passenger Car Units). Cars and LGVs equal 1 PCU, whilst HGVs equal 2.2 PCUs.

Figure 8. AM Peak Inbound trips to Hertford⁷

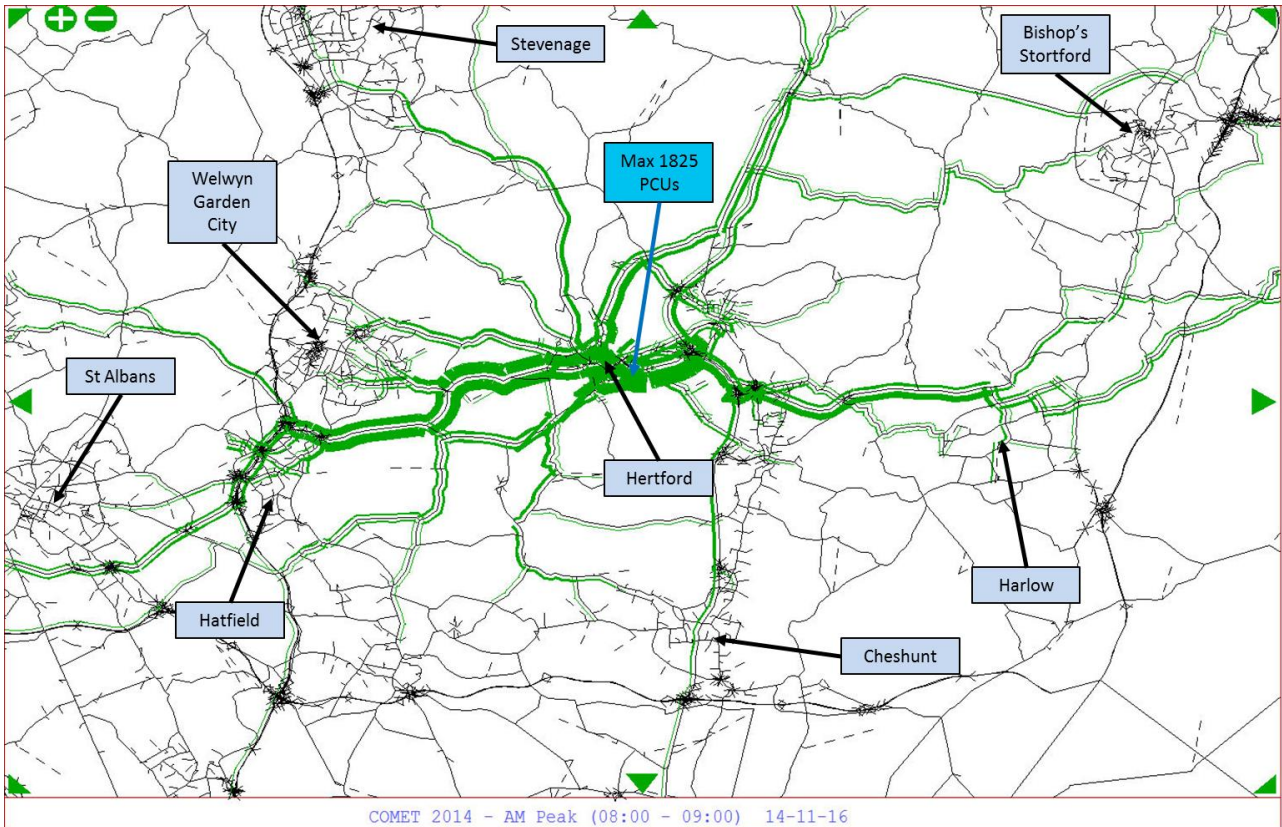
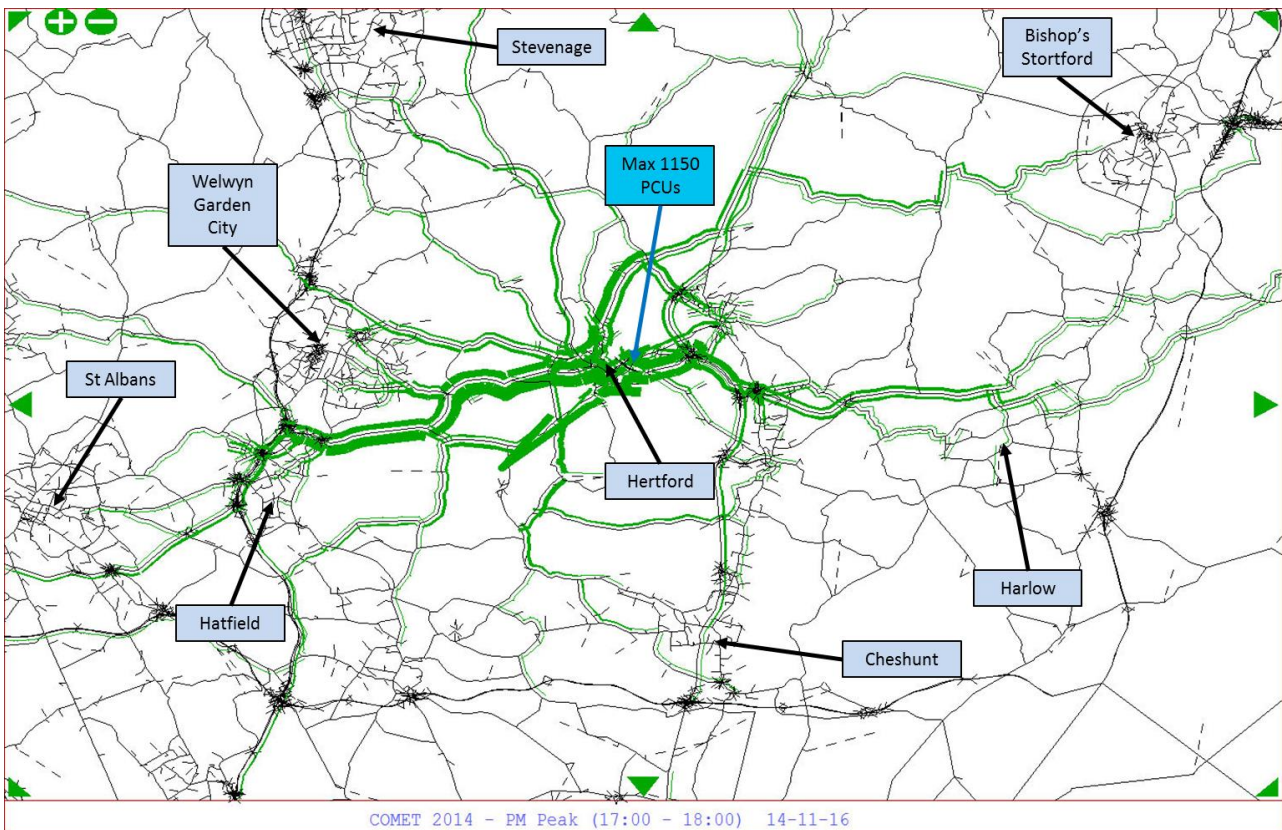


Figure 9. PM Peak Outbound trips from Hertford⁷



3. Review of Base Year (2014) Traffic Conditions

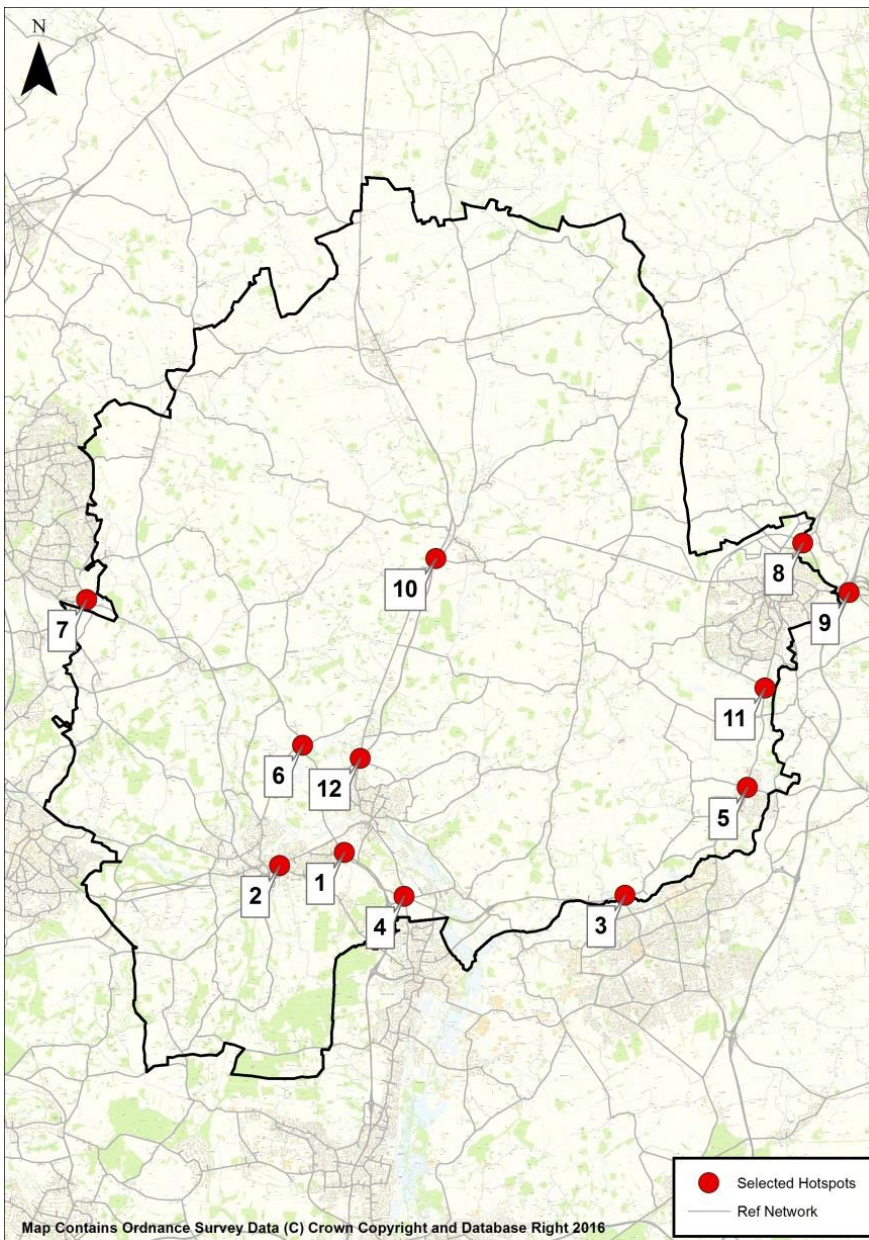
3.1.1 This section presents the modelled condition of the highway network (principally in relation to congestion) in East Hertfordshire in 2014 (the Base Year of COMET). The Base Year model (2014) results are provided as a benchmark against which to view the Forecast year (2031) results covered later in this document.

3.2 Selected Junctions

3.2.1 The focus of the highway network analysis for both 2014 and 2031 is on twelve selected junctions in East Hertfordshire, as shown in Figure 10 (with Selected Junction ID). These junctions (which are/may become congestion hotspots) have been selected by the following means:

- Previous HCC studies
- TrafficMaster Data
- Liaison with EHC

Figure 10. Selected Junctions in East Hertfordshire



3.3 Base Year (2014) Network Congestion

3.3.1 Figure 11 and Figure 12 show the congestion in the COMET Base Year (2014) model in East Hertfordshire for the AM and PM Peaks, respectively⁸. The selected junction ID is also shown.

3.3.2 It should be noted that due to the strategic nature of COMET, the impact of on street parking is not represented, nor is detailed junction operation. This may locally reduce the capacity of some sections of the highway network (e.g. village and town centres).

3.3.3 There are strong consistencies between the AM and PM peak in terms of the spatial distribution of congestion:

- A414 through Hertford (particularly around Bluecoats Roundabout)
- Eastwick Roundabout (north of Harlow)
- Signalised junction in Little Hadham
- B1383 – A120 (Bishop's Stortford)
- A602 – Anchor Ln – Wadesmill Rd (north of Hertford)
- A1184 – Station Rd – West Rd (Sawbridgeworth)
- M11 Junction 8
- Various junctions within Bishop's Stortford town centre (COMET is not currently suitable to assess junction delays within the town centre)

3.3.4 Further commentary on the delays (including 2031 Forecast results) can be found in Table 2.

⁸ Congestion is shown in terms of both junction delay and link stress:

Junction delay is defined by the average delay for all possible turns at the given model node, weighted by the vehicular flow making each turn. Note that the delay for a specific turn at a junction may therefore be significantly higher or lower than this value indicates, but the defined measure gives an overall impression of junction operation.

Link stress is calculated by SATURN as a ratio of volume over capacity (V/C) for a given link. Links are generally considered to be approaching capacity at 80% V/C, beyond which there is a material deterioration in operation. Note that the length of the modelled queue on amber/red links is not related to the length of the link in the plot. The V/C value calculated by SATURN relates to the link as a whole, however, the queue may not extend along the whole link (particularly if the link is long). The extent of the queueing should therefore also be interpreted using the junction delay circles.

Figure 11. AM Peak 2014 Congestion Plot

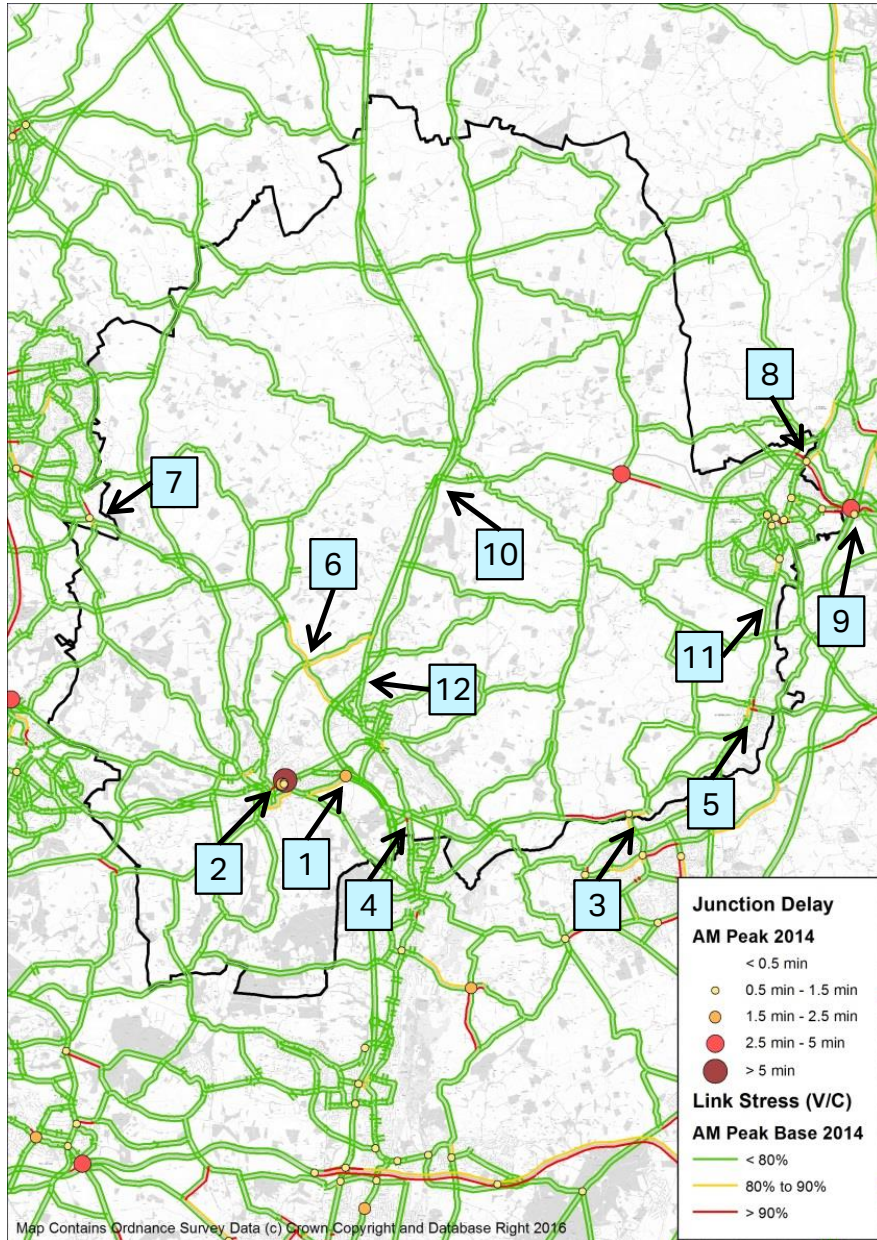
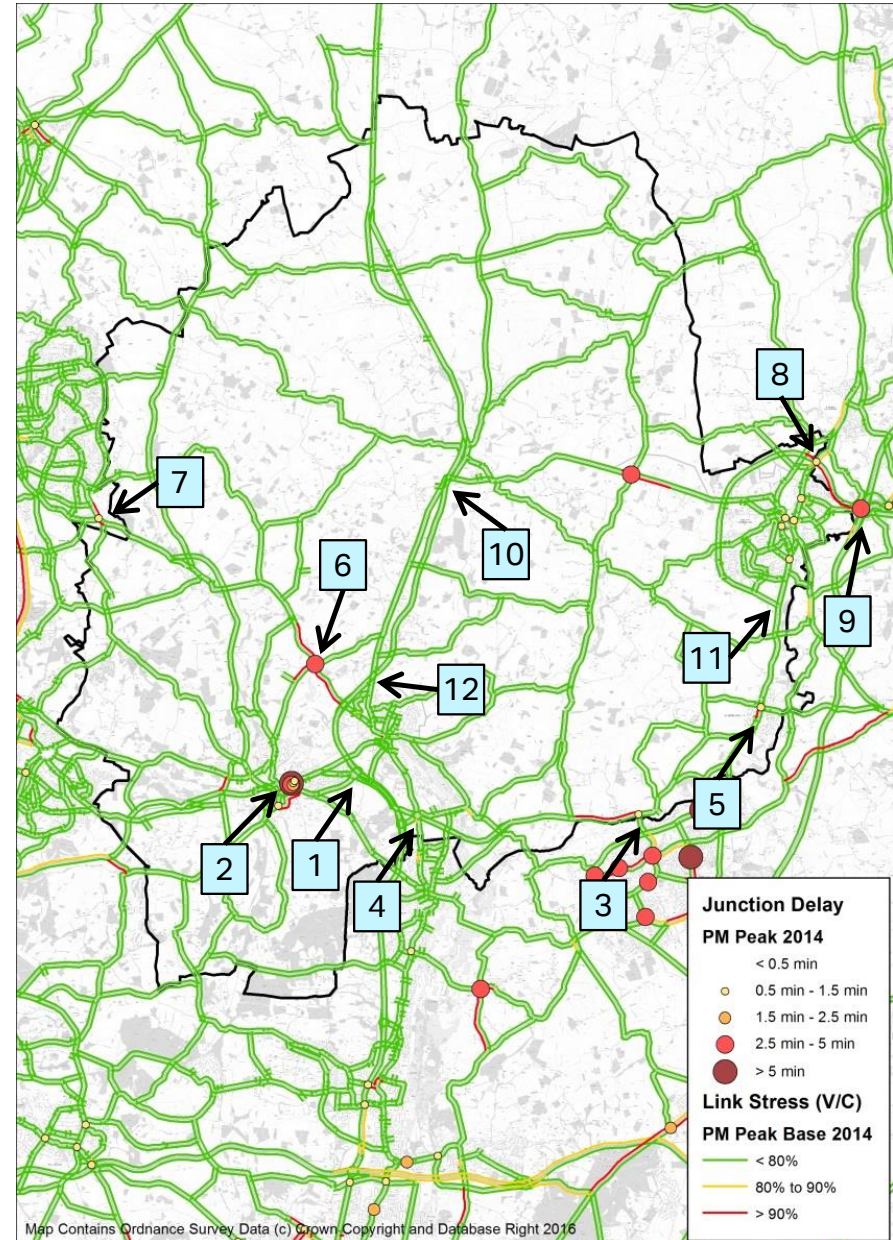


Figure 12. PM Peak 2014 Congestion Plot



4. Review of Forecast Year (2031) Traffic Conditions

4.1 Forecast Year (2031) Network Congestion

4.1.1 As was shown for the Base Year model in section 3.3, Figure 13 and Figure 14 present the congestion plots for 2031.

4.1.2 As stated in the Introduction, the 2031 Forecast includes Local Plan growth from all 10 Hertfordshire districts. Outside Hertfordshire, growth projections are taken from central government (Department for Transport) forecasts (NTEM 7) which are likely to under-represent the proposed magnitude of growth in Local Plans of neighbouring authorities (e.g. Essex). This allows for an assessment of the impacts of East Hertfordshire's (and other Hertfordshire districts') growth, however, may not capture the full impact of development around the Harlow and Bishop's Stortford areas.

4.1.3 The Forecast Year scenario also includes the most significant committed/very likely planned transport infrastructure changes. The highway schemes that have been introduced into the model network between the 2014 Base Year and 2031 Forecast year in East Hertfordshire are:

- A120 Little Hadham Bypass
- A602 Ware to Stevenage Corridor Strategy Stage 1
- A10 Amwell Roundabout – Removal of Bus Lane on southern A1170 arm
- Bishop's Stortford North Development
 - Access onto Hadham Road
 - New access onto A120 and Spine Road connecting with Rye Street
 - Addition of flared approaches on both A120 arms of A120 / B1383 roundabout
- Bishops Stortford North (ASR 5) access to Rye Street
- Gilston development access
- Land North and East of Ware Spine Road (development access road)

4.1.4 In addition to these schemes, the following highway schemes (of significance to East Hertfordshire) have been included in Essex:

- M11 Junction 8 short term capacity improvements
- New M11 Junction 7a with associated link to & roundabout on B183 Gilden Way (plus localised widening of Gilden Way)
- A414 Junction upgrades through Harlow
- Cambridge Rd, Harlow – new access into River Way

- 4.1.5 As expected, congestion generally increases across the district due to growth in traffic volumes. The most significant delay increase is at the Bluecoats Roundabout in Hertford in the PM Peak (> 5 mins additional delay compared to the Base Year), and to a lesser extent in the AM Peak. There are also several other junctions in the district where delays increase by between 30 secs and 1 min:
- Rush Green Roundabout
 - A602 – Anchor Ln – Wadesmill Rd (north of Hertford)
 - Eastwick Roundabout (north of Harlow)
 - A1184 – Station Rd – West Rd (Sawbridgeworth)
- 4.1.6 The signalised junction in Little Hadham is expected to experience a delay reduction of 1-1.5 mins between 2014 and 2031 due to the introduction of the Little Hadham Bypass. It should be noted that traffic signals in this location have not been optimised for the Forecast Year (which may reduce delay further here).
- 4.1.7 Table 2 provides a summary of the Base Year and Forecast Year conditions at the selected junctions. For reference, the abbreviation “V/C” in the table stands for the ratio of “volume over capacity” for the specified road. Links are generally considered to be approaching capacity at 80% V/C, beyond which there is a material deterioration in operation. The symbol “~” in the table denotes “approximately”.

Figure 13. AM Peak 2031 Congestion Plot

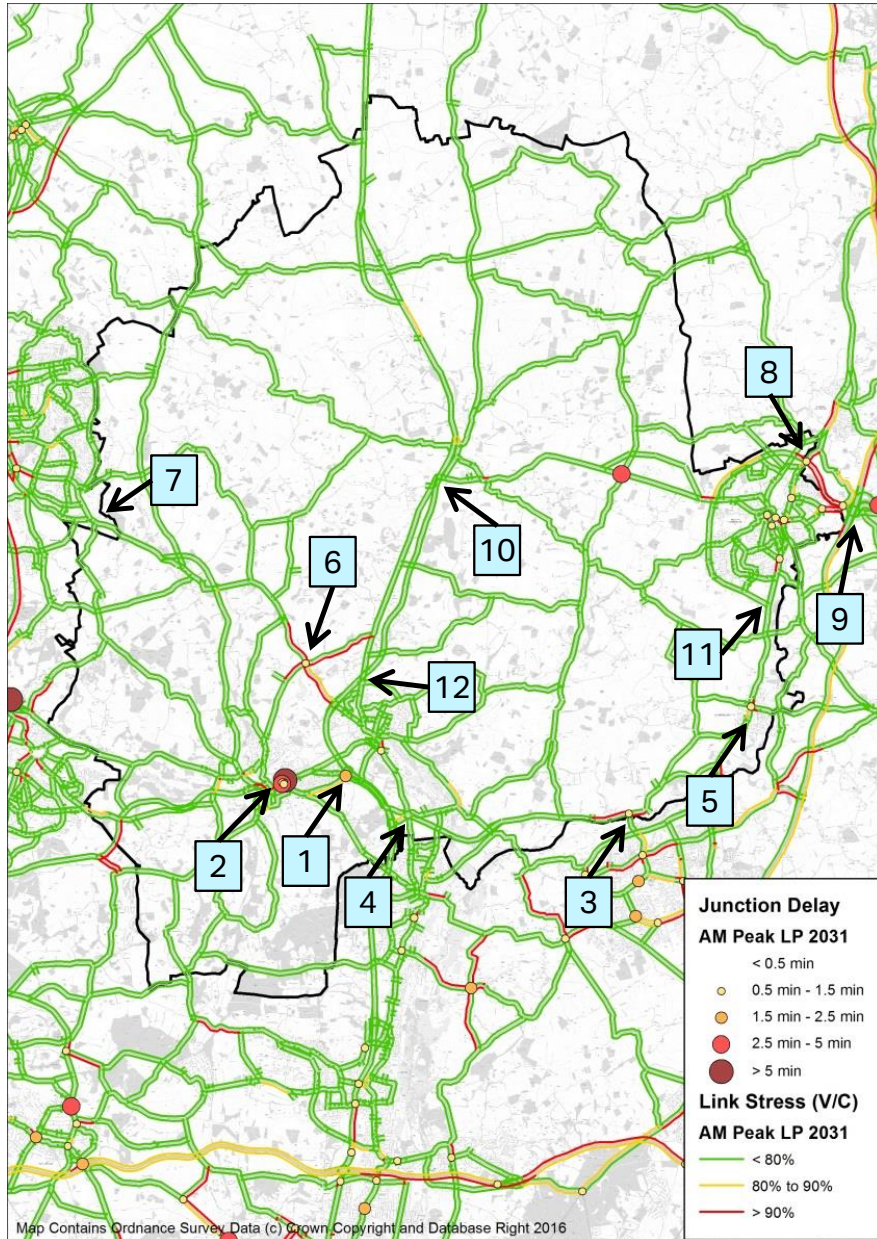


Figure 14. PM Peak 2031 Congestion Plot

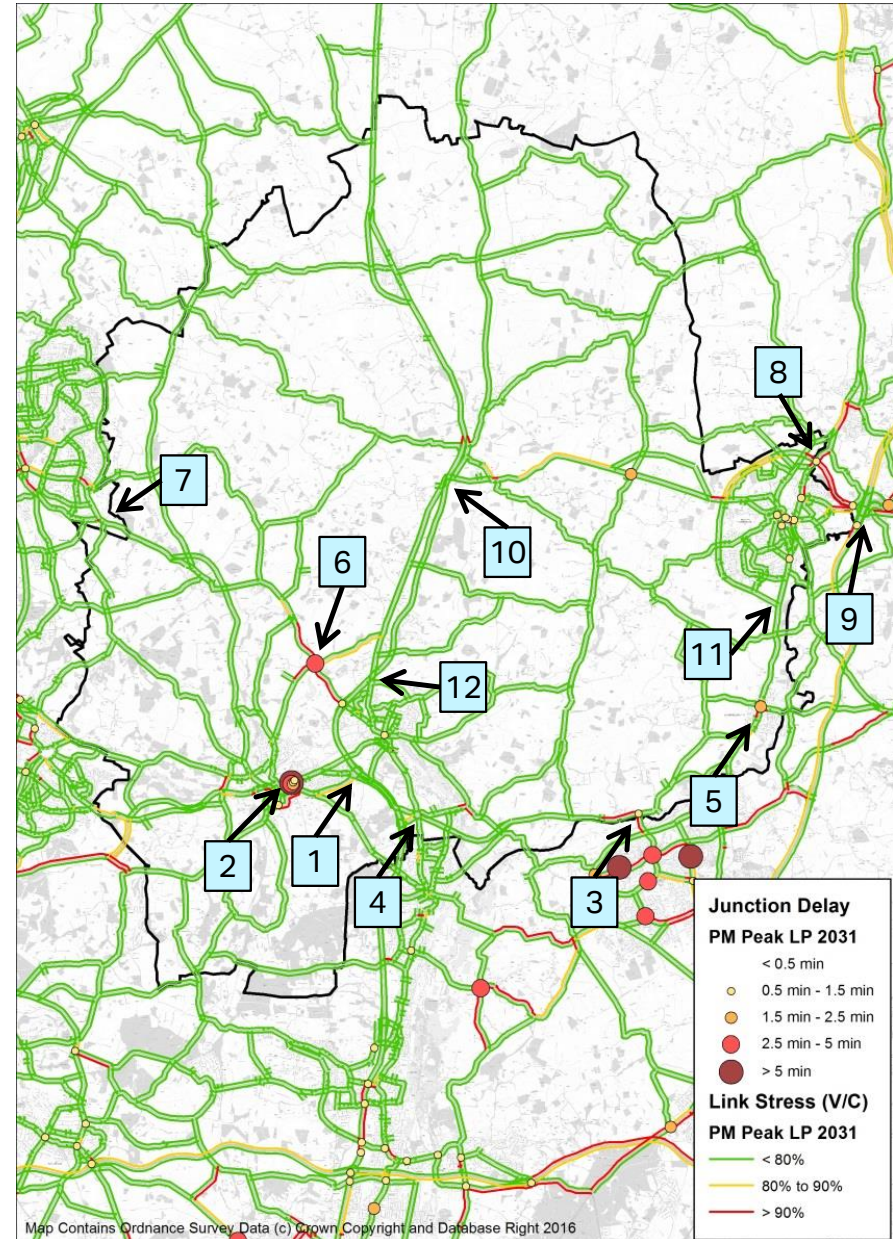


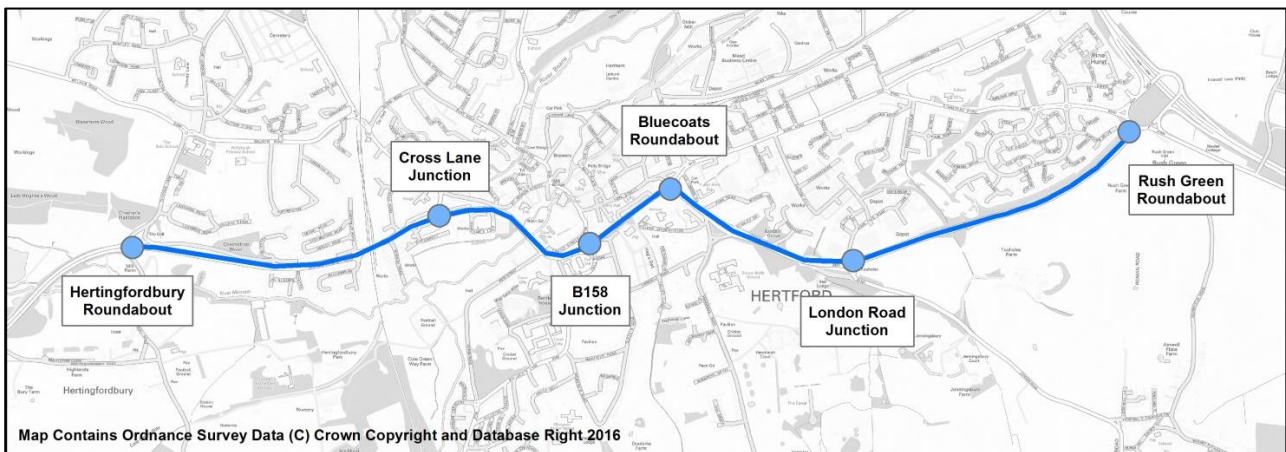
Table 2. Selected Junctions Delay (Base Year/Forecast Year Comparison)

ID	Junction Name	Town	COMET Base Year Congestion (most congested time period shown)	COMET 2031 Congestion (time period consistent with Base Year column)
1	Rush Green Roundabout	nr Hertford	AM Peak V/C >90% on B1502 NB approach Delay ~2 mins	V/C >90% on B1502 NB approach Delay ~2.5 mins
2	Bluecoats Roundabout A414 – A119	Hertford	AM Peak V/C >90% on both A414 approaches Some sections of roundabout itself have V/C >90%.	V/C >90% on both A414 approaches Some sections of roundabout itself have V/C >90%. Delay increases relative to Base Year on some approaches of up to ~1 min.
	A119/Mill Rd junction (adjacent to Blue Coats roundabout)	Hertford	AM Peak V/C >90% on both A119 approaches Delay ~5 mins	V/C >90% on westbound A119 approach Delay ~6 mins
3	Eastwick Roundabout A414 – Eastwick Rd	nr Harlow	AM Peak V/C >90% A414 EB V/C >80% on other approaches Delay ~1 min	V/C >90% A414 EB and WB approaches Delay from ~1.5 mins
4	Amwell Roundabout A414 – A1170 – B1502 – B181	nr Hoddesdon	PM Peak V/C 80%-90% on A1170 and B181 approaches	V/C >90% on B181 approach V/C 80-90% on A414 EB approach The scheme in the Forecast Year to remove the bus lane on the southern A1170 approach arm does reduce link stress on this arm.
5	A1184 – Station Rd – West Rd	Sawbridgeworth	PM Peak V/C >90% London Rd & Cambridge Rd Delay ~1 min	V/C >90% on all approaches Delay ~1.5 mins
6	A602 – Anchor Ln – Wadesmill Rd	nr Ware	PM Peak V/C >100% B158 EB Delay 2 mins	V/C >100% on A602 approaches and Wadesmill Rd V/C >80% Anchor Lane Delay ~3.5 mins
7	A602 – Hertford Rd	nr Stevenage	PM Peak V/C >90% on A602 approaches Delay ~1 min	V/C >90% on A602 NB Delay <30 secs (due to signalisation scheme)
8	B1383 – A120	Bishop's Stortford	PM Peak V/C >90% on A120 approaches V/C 80%-90% on B1383 approaches Delay ~1.5 mins	V/C >90% on all approaches Delay ~1.5 mins Delay increases slightly between Base Year and Forecast Year (despite scheme here to add flared approaches on A120 arms).
9	M11 Junction 8	Bishop's Stortford	AM Peak V/C >90% on A120 approaches	V/C <80% on all approaches. However, delay ~1 min and V/C >90% at Birchanger Roundabout is likely to be having a restraining effect.
10	A120 – A10 – ALL	Puckeridge	No significant delay indicated in model.	No significant delay indicated in model.
11	A1184 – Thorley St	Bishop's Stortford	No significant delay indicated in model.	No significant delay indicated in model.
12	A10 – A1170	nr Ware	No significant delay indicated in model.	No significant delay indicated in model.

4.2 A414 Hertford Corridor Analysis

- 4.2.1 Analysis is provided in this section that illustrates the locations of highway network delay along the A414 in Hertford⁹.
- 4.2.2 As is shown in Figure 1, it should be noted that the COMET Base Year model over-represents delay through Hertford in both directions in the PM Peak, and under-represents delay in the westbound direction in the AM Peak. The representation of the eastbound movement in the AM Peak is WebTAG compliant.
- 4.2.3 Any misrepresentation of delay in the Base Year is likely to be propagated into the Forecast Year, however, a high level indication of change in delay between the two years can nevertheless be shown.
- 4.2.4 All journey time analysis presented here relates to the section of the A414 between the Hertingfordbury Roundabout (St Mary's Ln/Thieves Ln) and the Rush Green Roundabout (A10) – see Figure 15 for an illustration of the route.

Figure 15. Analysed A414 Hertford Journey Time Route



- 4.2.5 Figure 16 shows the A414 eastbound journey time for the route, and shows the variation between the Base Year (BY) and Forecast Year (FY). As expected (due to rising traffic volumes on the A414), the journey time increases by approximately 7% to 10.5 mins.
- 4.2.6 In both modelled years, a consistent pattern exists whereby the largest delays are encountered at the Bluecoats Roundabout (see Table 2 for details of congestion at this roundabout).
- 4.2.7 Figure 17 shows similar journey time results, however, for the westbound direction. Unlike for the eastbound movement, there is a small reduction in journey time between the Base Year and Forecast Year (despite flow increases). This result is due to signal optimisation in the Forecast Year that increases the capacity of the A414 westbound movement through the Bluecoats Roundabout. This prioritisation of the A414 westbound movement causes a knock-on increase in delay for trips from the A119 (Ware Rd) to the A414 of approximately 1 minute¹⁰.
- 4.2.8 The journey time results for the PM Peak are shown in Figure 36 and Figure 37 (see appendix), and indicate Forecast Year journey times that are either slightly longer or broadly equal to the Base Year values.

⁹ AECOM has previously undertaken work along the A414 Corridor in Hertford as part of the A414 Transport Strategy (2013-2015). Any comments made as part of this work may vary from the analysis presented here for the following reasons: i. the S-Paramics model used for the previous work is a micro-simulation package, whereas COMET is a strategic tool, ii. the local growth assumptions have very likely evolved since 2014, and iii. the S-Paramics model was locally calibrated, whereas COMET has not been calibrated in Hertford (or any other urban area).

¹⁰ Increase of 1 minute along a route starting from the A119 (Ware Rd) approach arm to the A414/B158 roundabout.

4.2.9 A414 delays through Hertford are largely a consequence of congestion at constrained junctions in this urban area. Therefore, there is a potential need for a strategic (i.e. non-junction based) mitigation solution for this issue.

Figure 16. AM Peak Journey Time A414 – Eastbound

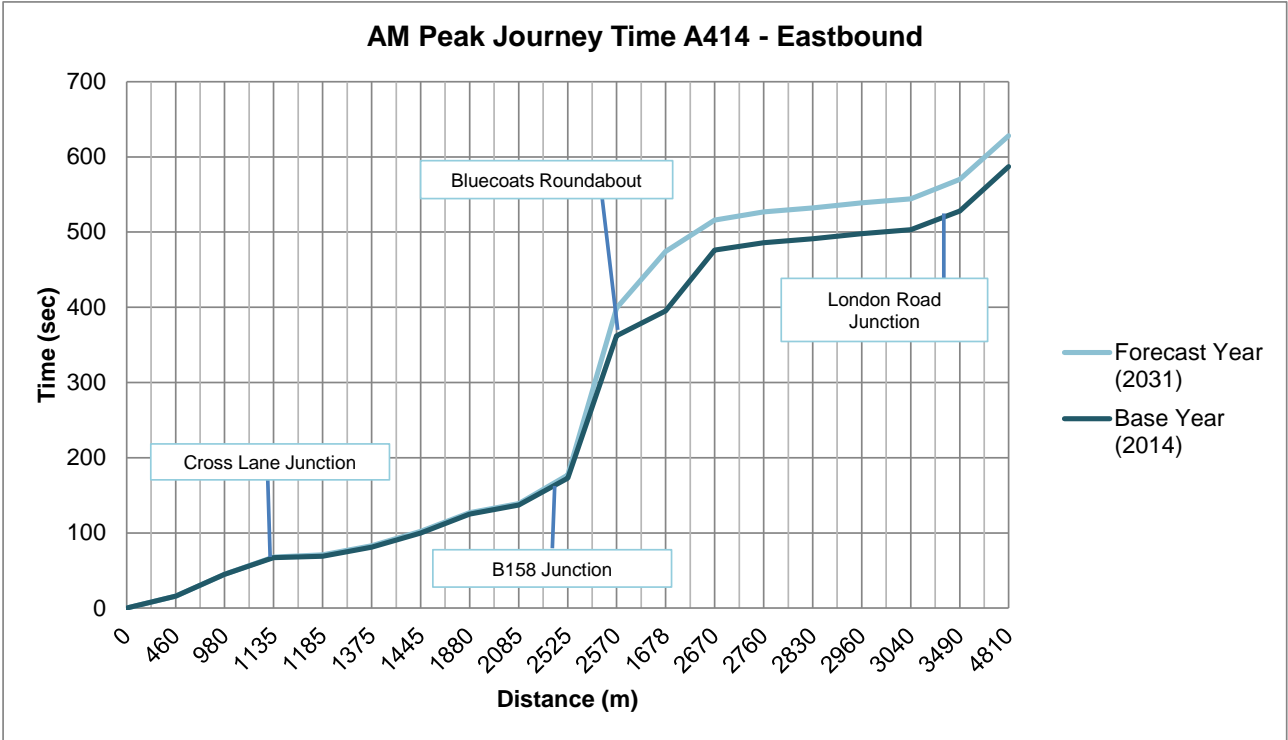
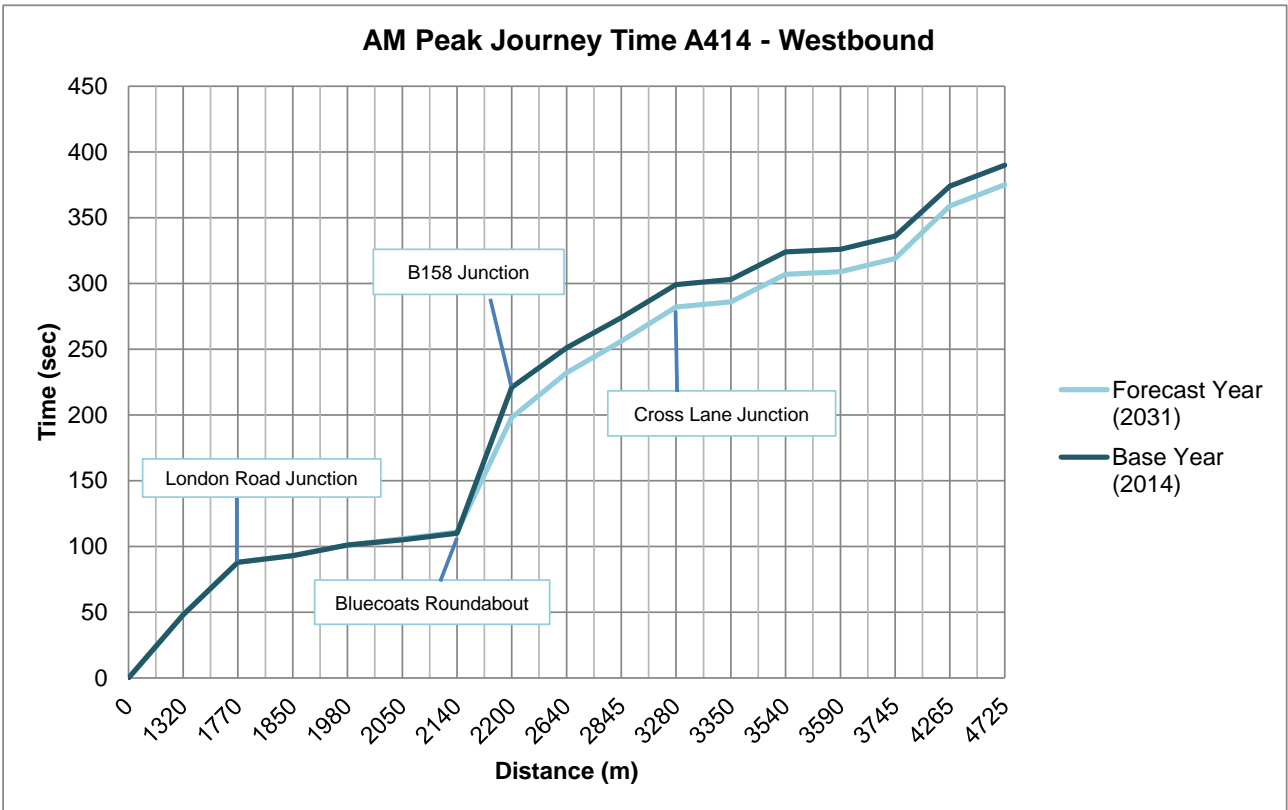


Figure 17. AM Peak Journey Time A414 – Westbound



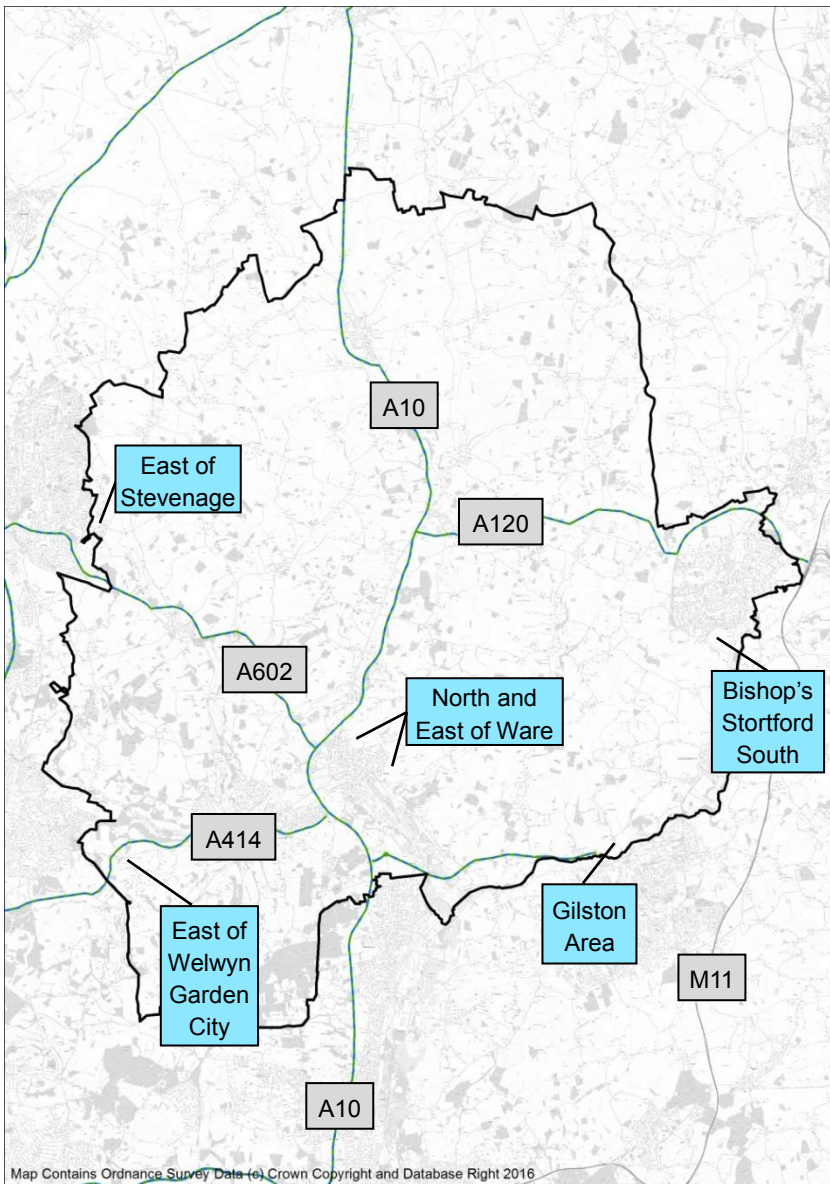
5. Proposed Major East Hertfordshire Developments

5.1.1 This section of the document considers five major proposed developments in East Hertfordshire, and provides initial analysis on the likely spatial distribution of their impacts on the highway network. The developments covered are as follows (including the magnitude of growth as agreed with EHC in October 2016):

- Gilston Area (3,050 dwellings)
- Bishop's Stortford South (750 dwellings & 500 jobs)
- North and East of Ware (1,000 dwellings & 300 jobs)
- East of Stevenage (600 dwellings)
- East of Welwyn Garden City (1,350 dwellings)

5.1.2 It is understood from EHC that the above sites will be delivered in line with the trajectory in the District Plan, which details differing delivery dates for these sites across the plan period, but provides for the total quantum of development being delivered by 2033. While the COMET model extends only as far as 2031, this report is intended to take into account the impact of strategic development over the whole plan period. Therefore, the full quantum of development that would be achieved for the five sites by 2033 has been included for modelling purposes.

Figure 18. Proposed Major East Hertfordshire Developments



- 5.1.3 At this stage, this analysis (i.e. the assessment of likely impacts) is in its initial stage as no comparison has been made with a scenario that does not contain these developments.
- 5.1.4 The analysis below shows the modelled volume and distribution of trips associated with the development, as well as a local congestion plot in the development's vicinity. It should be noted that the delay/congestion indicated on these plots (Figure 20, Figure 22, Figure 24, and Figure 26) is not wholly attributable to the development trips, however, illustrates where development trips would contribute to congestion in the network.
- 5.1.5 The diagrams provided in this section are for the AM Peak only. The equivalent analysis has also been undertaken for the PM Peak, and reveals a broadly inverted trip distribution compared to the AM Peak, so is therefore not shown. The extent/locations of network congestion, however, do vary slightly between the two peak hours – PM Peak congestion can be seen in Figure 14.

5.2 Gilston Area

- 5.2.1 As stated in section 4.1.2, the assumed growth outside Hertfordshire in the model is derived from central government (Department for Transport) forecasts (NTEM 7) which are likely to under-represent the proposed magnitude of growth in Local Plans of neighbouring authorities. This is particularly relevant for the Gilston Area given its proximity to Harlow.
- 5.2.2 It is understood that the Essex County Council VISUM model does include Essex authorities' Local Plan growth. This VISUM model has not been reviewed as part of this work, however, its growth assumptions may mean it is a more appropriate tool in this location.
- 5.2.3 Figure 19 and Figure 20 show the AM Peak trip distribution and congestion plot for the Gilston Area development. This site accesses the modelled network on Eastwick Rd and the A414 (see dashed lines in diagram).
- 5.2.4 A significant proportion of development trips use the A414 between this site and the A10 via Eastwick Roundabout and Amwell Roundabout. Beyond the A10/A414 junction, the strongest interaction is with the urban areas in Broxbourne District between the A414 and M25. A smaller proportion of the developments trips are to/from Hertford and Ware via the A414.
- 5.2.5 In addition to the A414/A10 corridors, developments trips are also modelled on the M11 via the A1184 and M11 Junction 7a (a Forecast Year scheme).
- 5.2.6 The following selected junctions (see Table 2 for full list) are likely to receive trips associated with this development:
- Eastwick Roundabout (selected junction 3)
 - Amwell Roundabout (selected junction 4)
 - Rush Green Roundabout (selected junction 1)
 - A1184 – Station Rd – West Rd (Sawbridgeworth) (selected junction 5)
 - Bluecoats Roundabout (selection junction 2)

5.3 Bishop's Stortford South

- 5.3.1 Figure 21 and Figure 22 show the AM Peak trip distribution and congestion plot for the Bishop's Stortford South development. This site accesses the modelled network on Obrey Way (see dashed line in diagram).
- 5.3.2 Some of the development trips to/from this site are internal to Bishop's Stortford, and access the town centre via Whittington Way and London Rd. Of the development trips that are not internal to Bishop's Stortford, however, the relevant corridors are the A1184 (towards Sawbridgeworth and selected junction 5 in Figure 10) and the A120.

5.3.3 The shortest route between this development and M11 Junction 8 is through the town centre. Congestion within Bishop's Stortford, however, encourages modelled trips to route via Pig Ln and Church Rd, instead.

5.3.4 The following selected junctions (see Table 2 for full list) are likely to receive trips associated with this development:

- A1184 – Station Rd – West Rd (Sawbridgeworth) (selected junction 5)
- A1184 – Thorley St (Bishop's Stortford) (selected junction 11)
- M11 Junction 8 (selected junction 9)
- Eastwick Roundabout (selected junction 3)

5.4 North and East of Ware

5.4.1 Figure 23 and Figure 24 show the AM Peak trip distribution and congestion plot for the North and East of Ware development. This site accesses the modelled network via a new spine road connecting the A1170, Fanhams Hall Rd and the B1004 (see dashed lines in diagram).

5.4.2 There is a strong linkage between this development and the A10 (primarily south of Ware) via the A1170. Elsewhere, development trips are likely to use Hollycross Rd (towards B181 into Harlow), Anchor Ln, and the A602 (towards Stevenage). Trips via Wadesmill Rd and the A414 to Hertford are also indicated by the model.

5.4.3 The following selected junctions (see Table 2 for full list) are likely to receive trips associated with this development:

- A602 – Anchor Ln – Wadesmill Rd (selected junction 6)
- Rush Green Roundabout (selected junction 1)
- A10 – A1170 (selected junction 12)

5.5 East of Stevenage

5.5.1 Figure 25 and Figure 26 show the AM Peak trip distribution and congestion plot for the East of Stevenage development. This site accesses the modelled network via Broadwater Ln/Benington Rd (see dashed line in diagram)¹¹. Trips to/from the A602 are therefore fed via the Broadwater Ln/Gresley Way junction.

5.5.2 The origins/destinations of trips associated with this development are primarily in Stevenage, and modelling indicates a relatively minor interaction with the East Hertfordshire network. Where this interaction exists, it is via the A602 towards the A10.

5.5.3 The following selected junctions (see Table 2 for full list) are likely to receive trips associated with this development:

- A602 – Anchor Ln – Wadesmill Rd (selected junction 6)
- A602 – Hertford Rd (Stevenage) (selected junction 7)
- Junctions on A602 between district boundary and A1(M), including A602/Monkswood Way roundabout (Stevenage).

¹¹ It is recognised in reality the access point will be further north on Gresley Way (opposite the White Way and Uplands). The model zone in which this development falls, however, accesses the network via Broadwater Ln/Benington Rd. This is due to the strategic nature of COMET. Nevertheless, development trips to/from the A602 do route via the Broadwater Ln/Gresley Way junction (as will happen in reality). Therefore, at a strategic level, this is not considered to be a material limitation.

5.6 East of Welwyn Garden City

5.6.1 Figure 27 and Figure 28 show the AM Peak trip distribution and congestion plot for the East of Welwyn Garden City development. This site accesses the modelled network via the A414/Birchall Ln roundabout¹².

5.6.2 The origins/destinations of trips associated with this development are primarily in Welwyn Garden City, and modelling indicates a relatively minor interaction with the East Hertfordshire network beyond Hertford. Trips from this site into East Hertfordshire predominantly use the A414 in the direction of Hertford, A602 and A10. The number of westbound A414 trips towards A1(M) is relatively low (up to 20) when compared to the eastbound A414 trips towards Hertford (up to 50).

5.6.3 The following selected junctions (see Table 2 for full list) are likely to receive trips associated with this development:

- A602 – Anchor Ln – Wadesmill Rd (selected junction 6)
- Rush Green Roundabout (selected junction 1)
- Bluecoats Roundabout (selection junction 2)

¹² It is recognised in reality the access point will be on Birchall Ln (north/west of the A414). The model zone in which this development falls, however, means that development trips need to use the A414/Birchall Ln roundabout. In reality, this will not be the case, however, is due to the strategic nature of COMET. The overestimation of development trips through this roundabout is acknowledged, however, no significant congestion is modelled here. Therefore, at a strategic level, this is not considered to be a material limitation.

Figure 19. Gilston Area AM Peak 2031 Trip Distribution

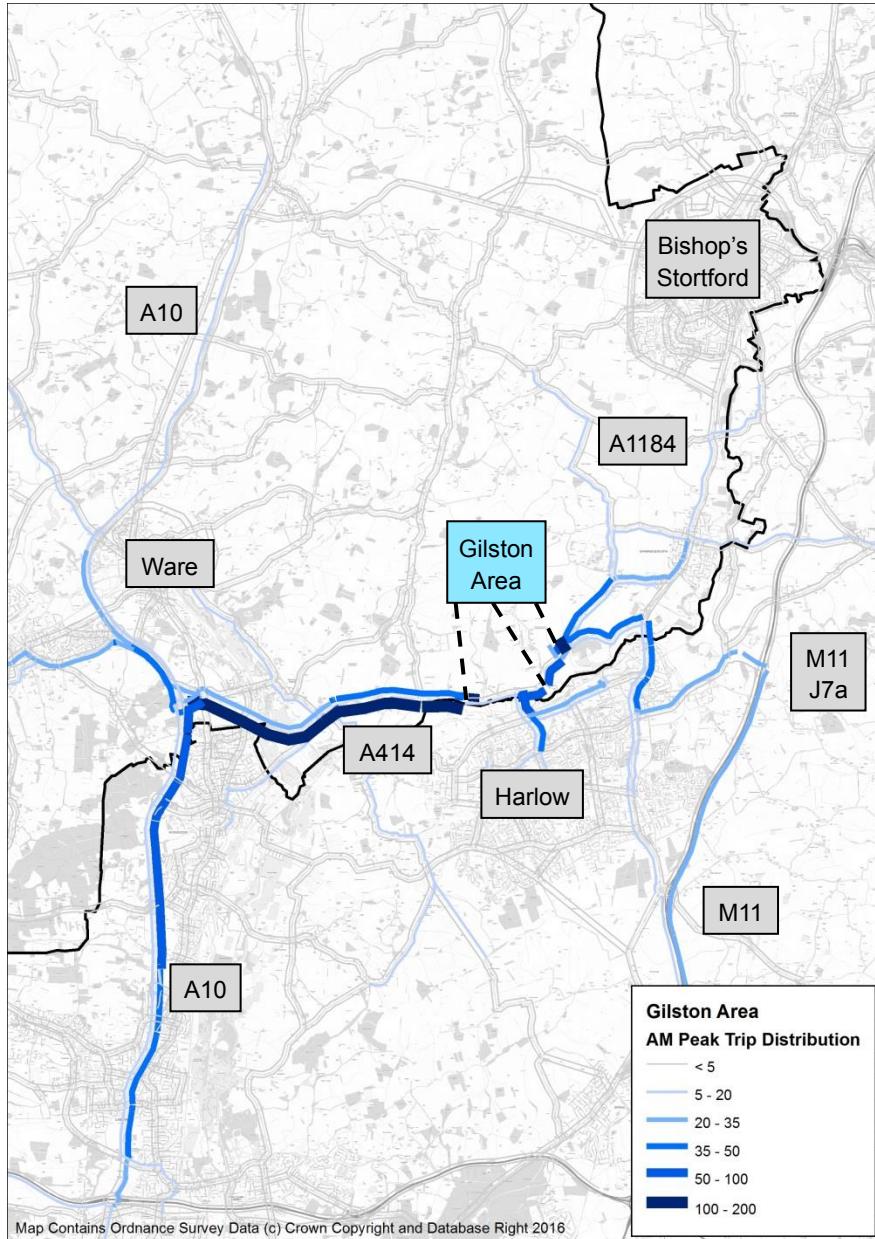


Figure 20. Gilston Area AM Peak 2031 Congestion Plot

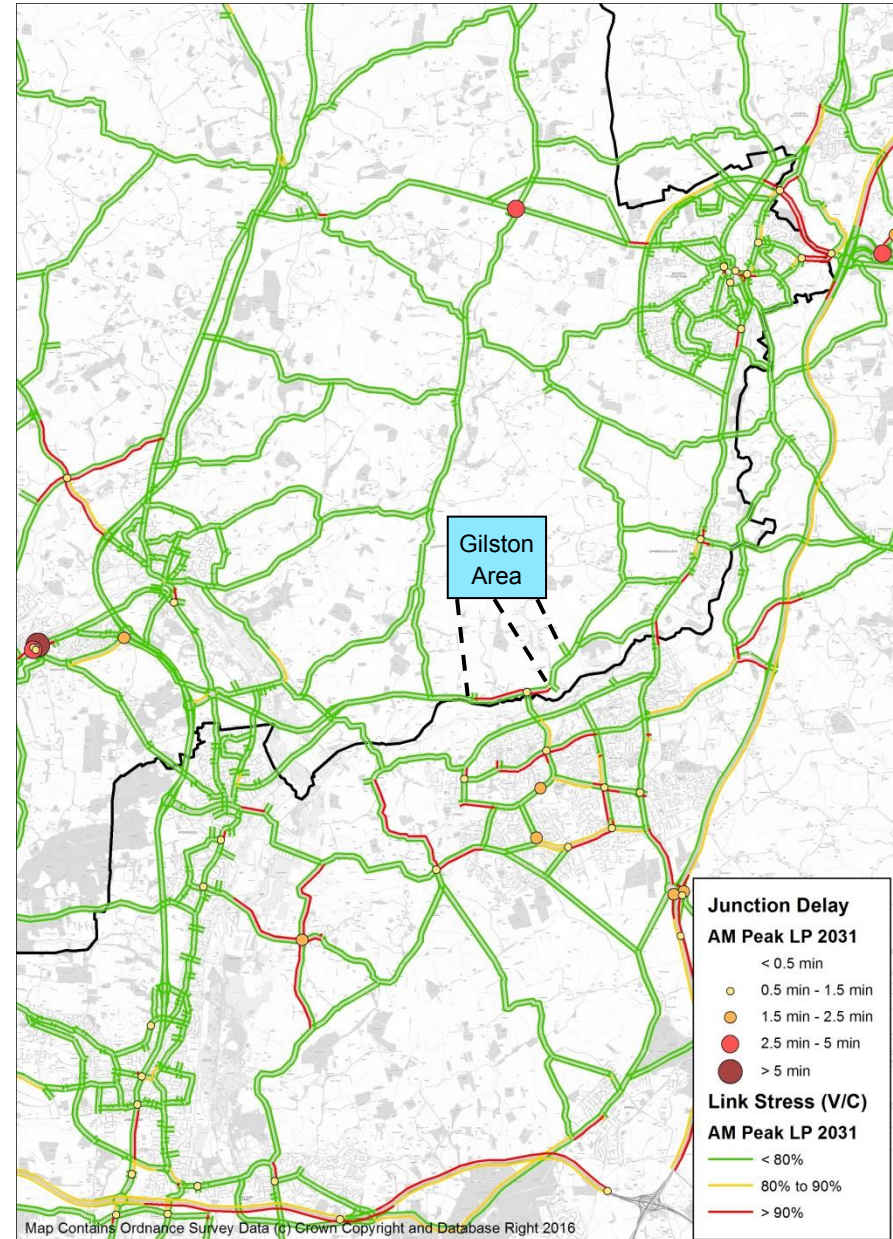


Figure 21. Bishop's Stortford South AM Peak 2031 Trip Distribution

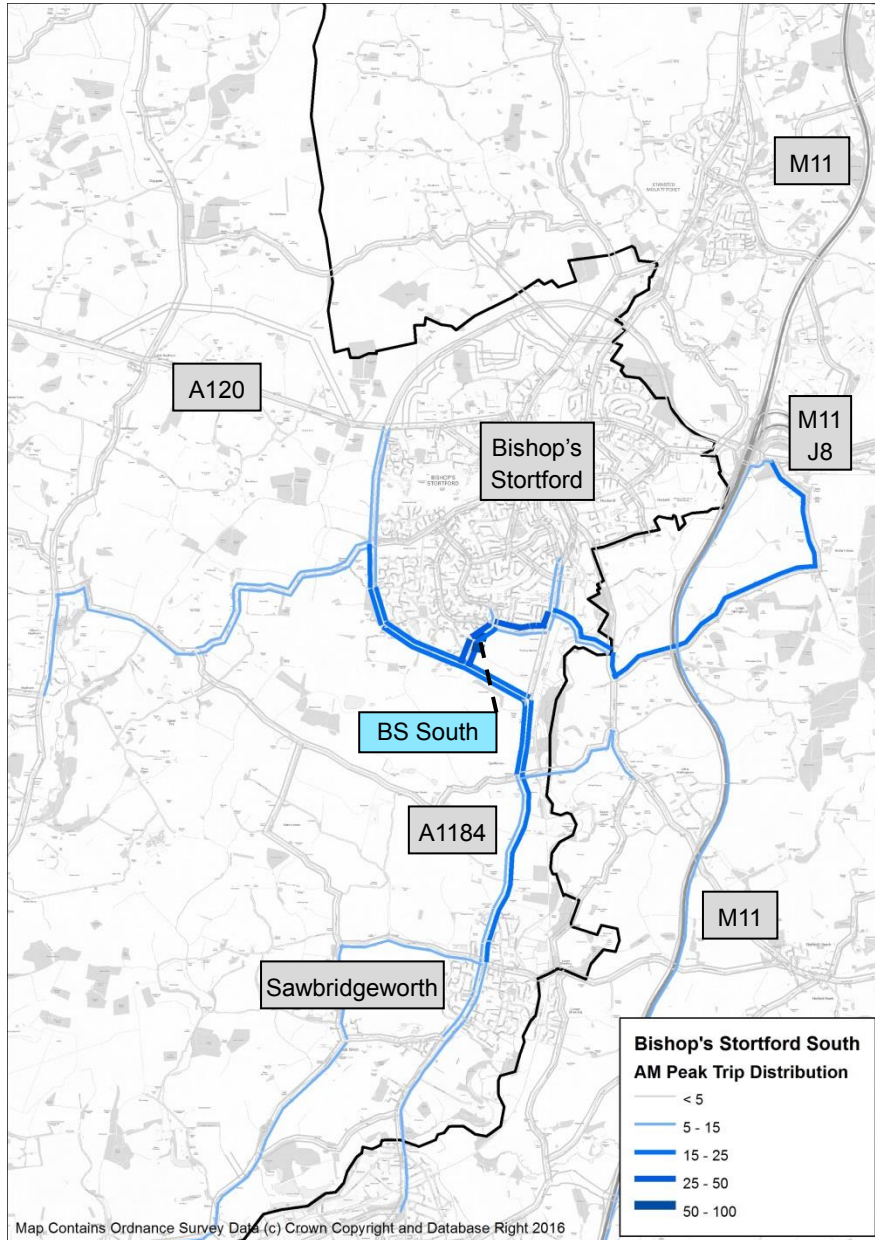


Figure 22. Bishop's Stortford South AM Peak 2031 Congestion Plot

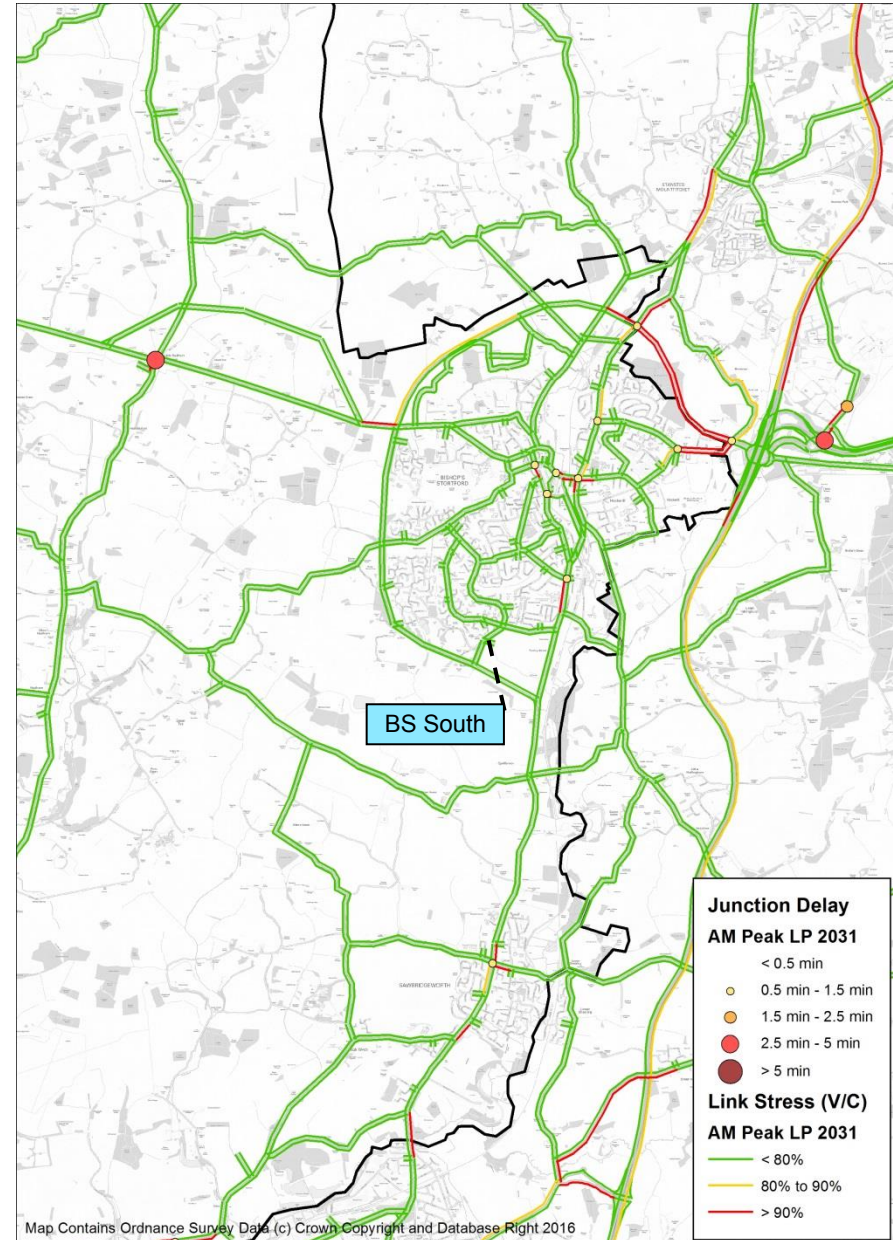


Figure 23. North and East of Ware AM Peak 2031 Trip Distribution

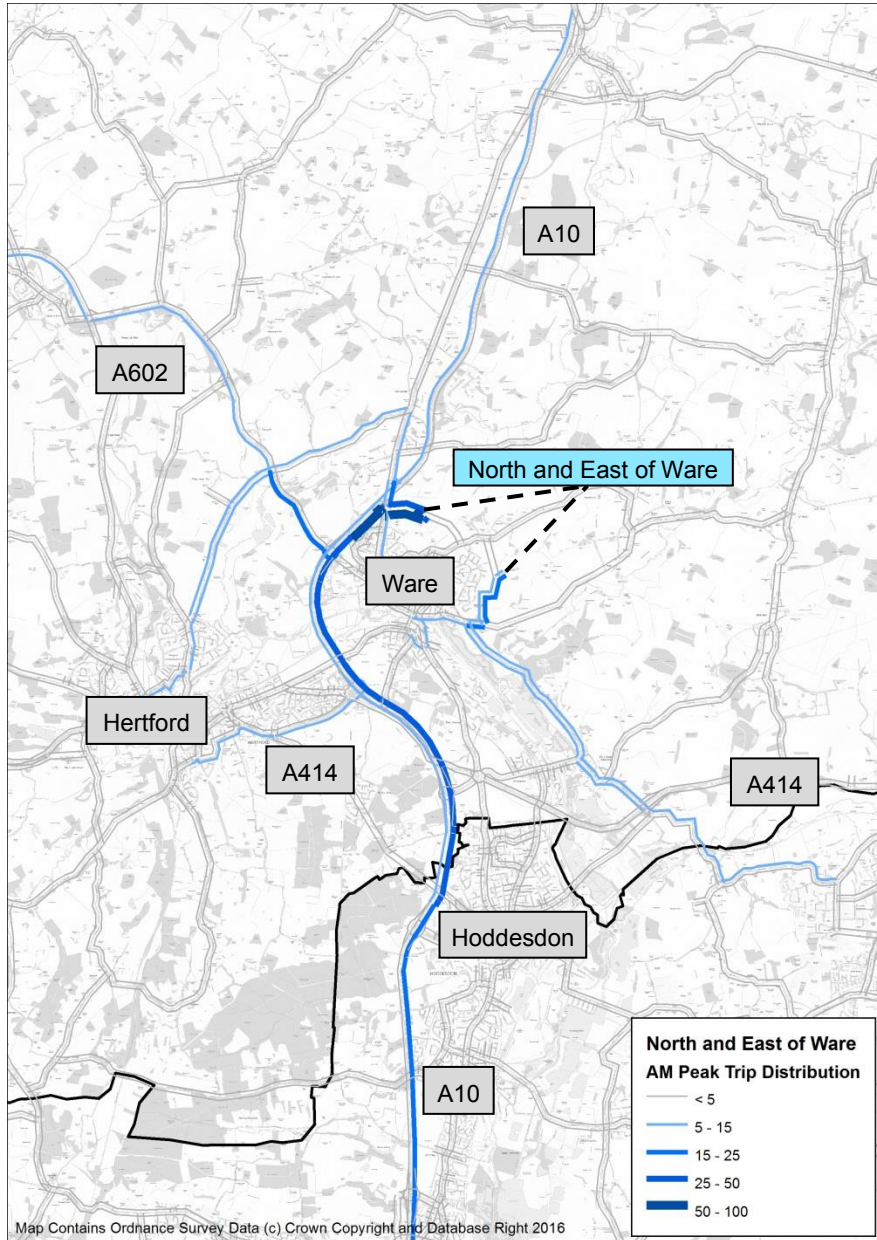


Figure 24. North and East of Ware AM Peak 2031 Congestion Plot

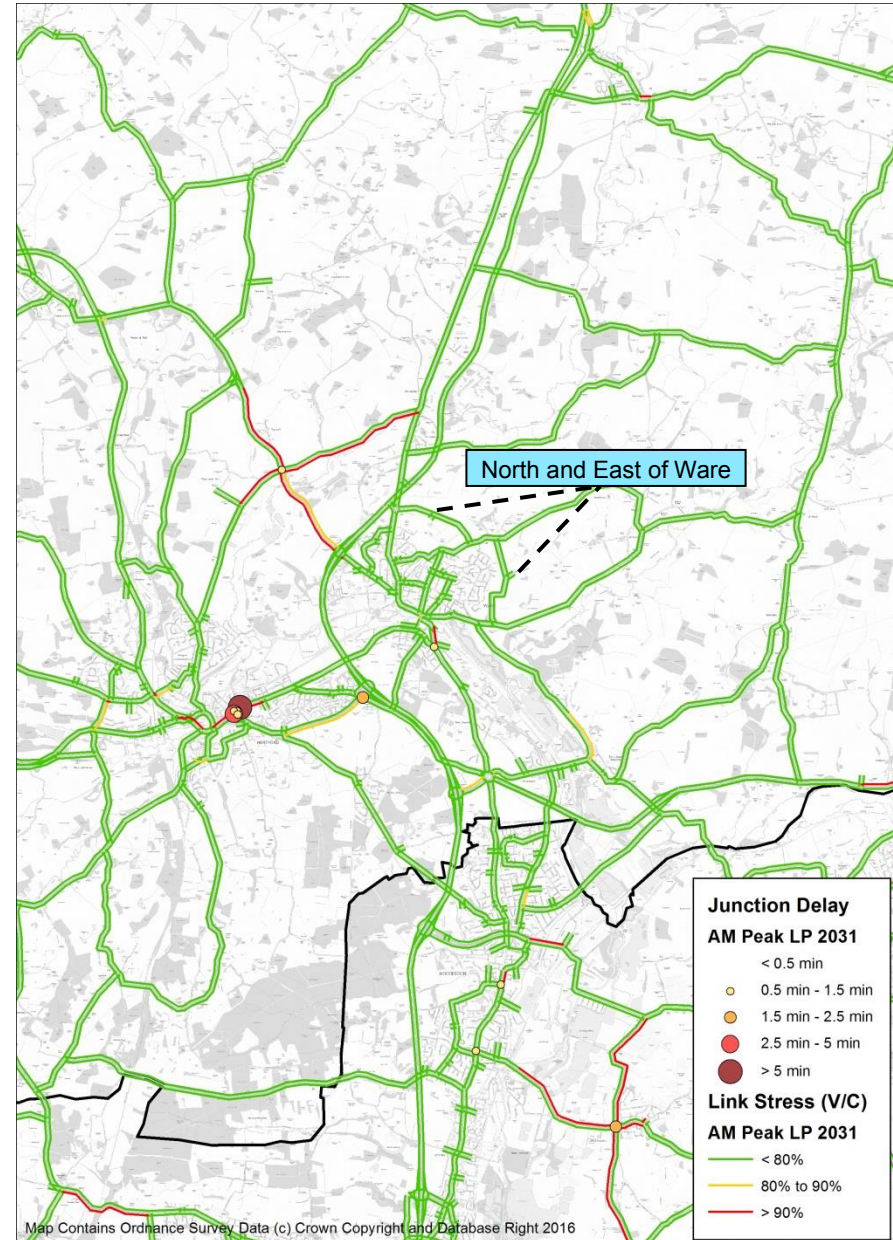


Figure 25. East of Stevenage AM Peak 2031 Trip Distribution

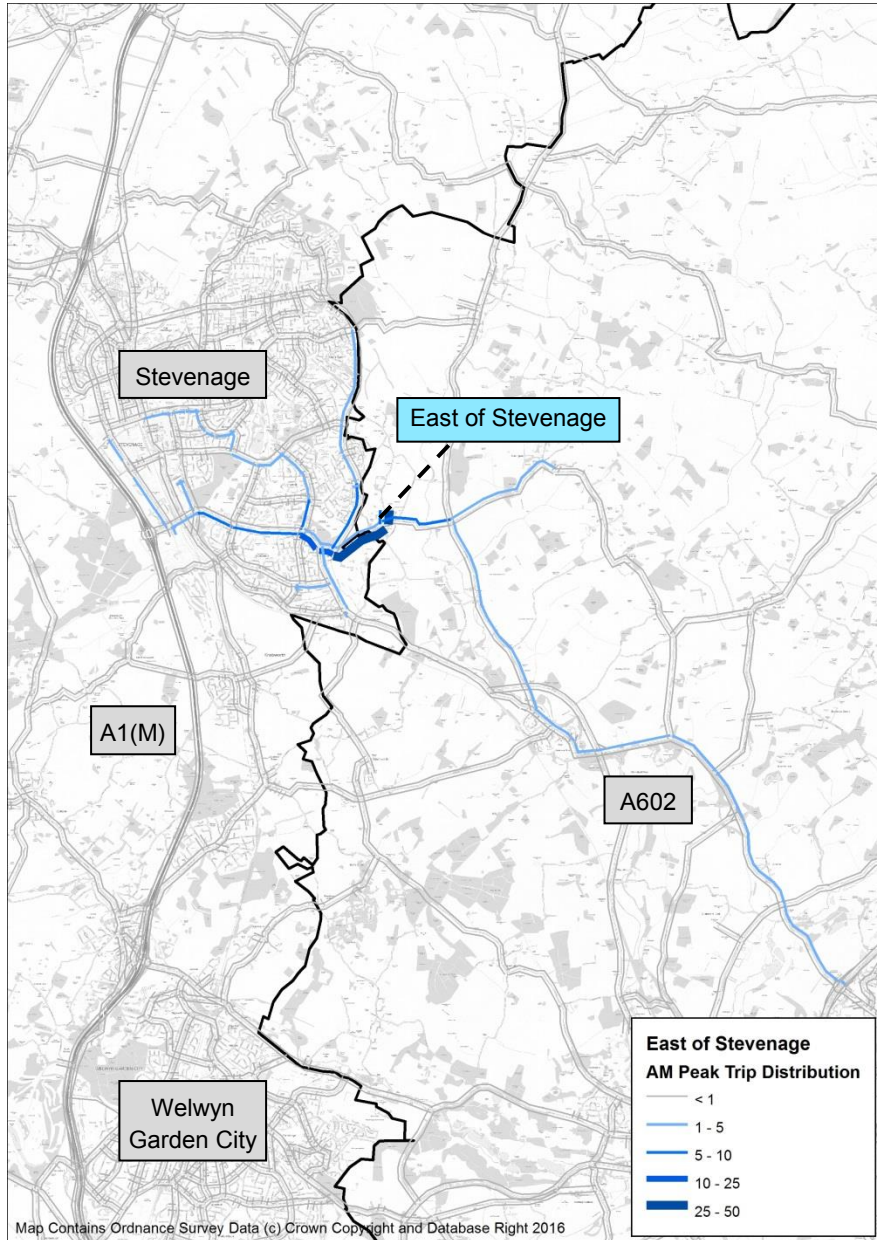


Figure 26. East of Stevenage AM Peak 2031 Congestion Plot

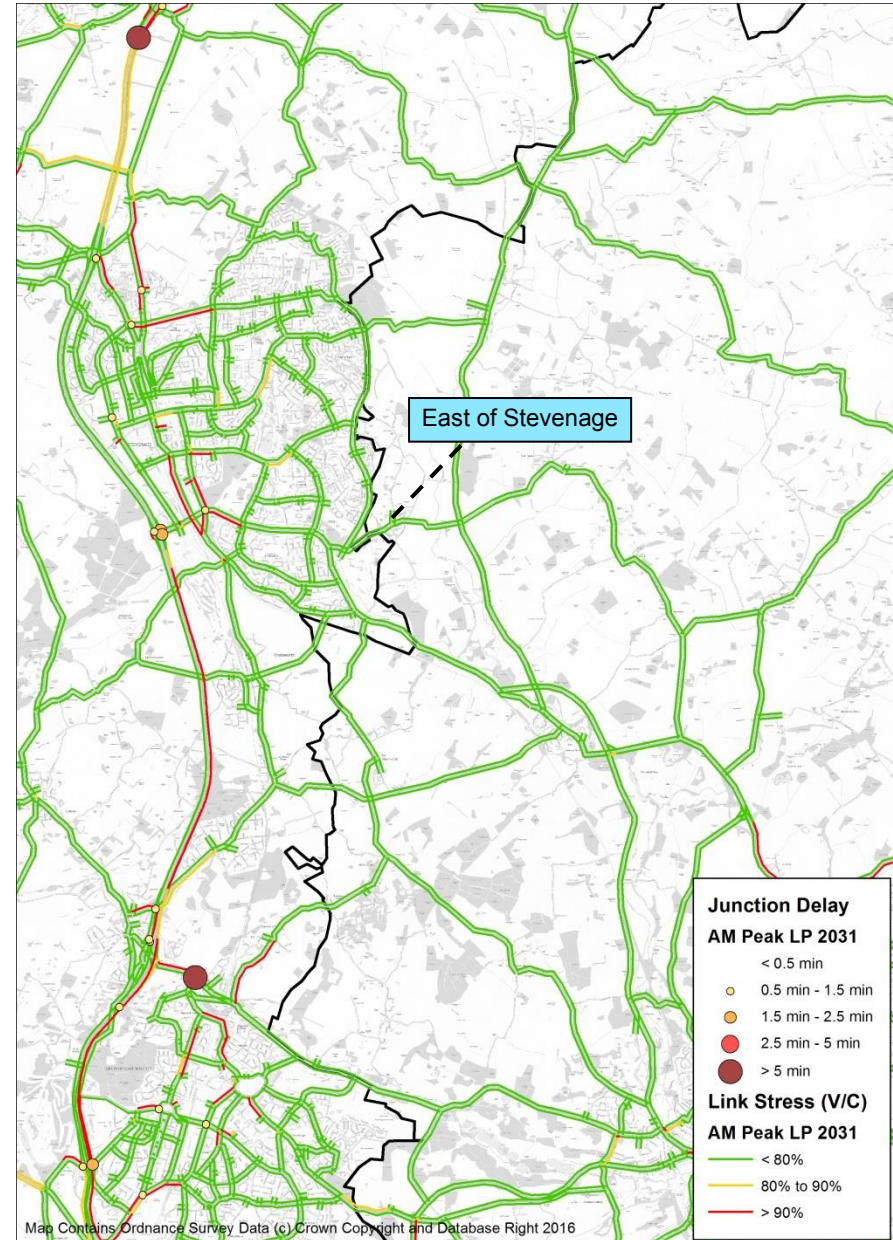


Figure 27. East of Welwyn Garden City AM Peak 2031 Trip Distribution

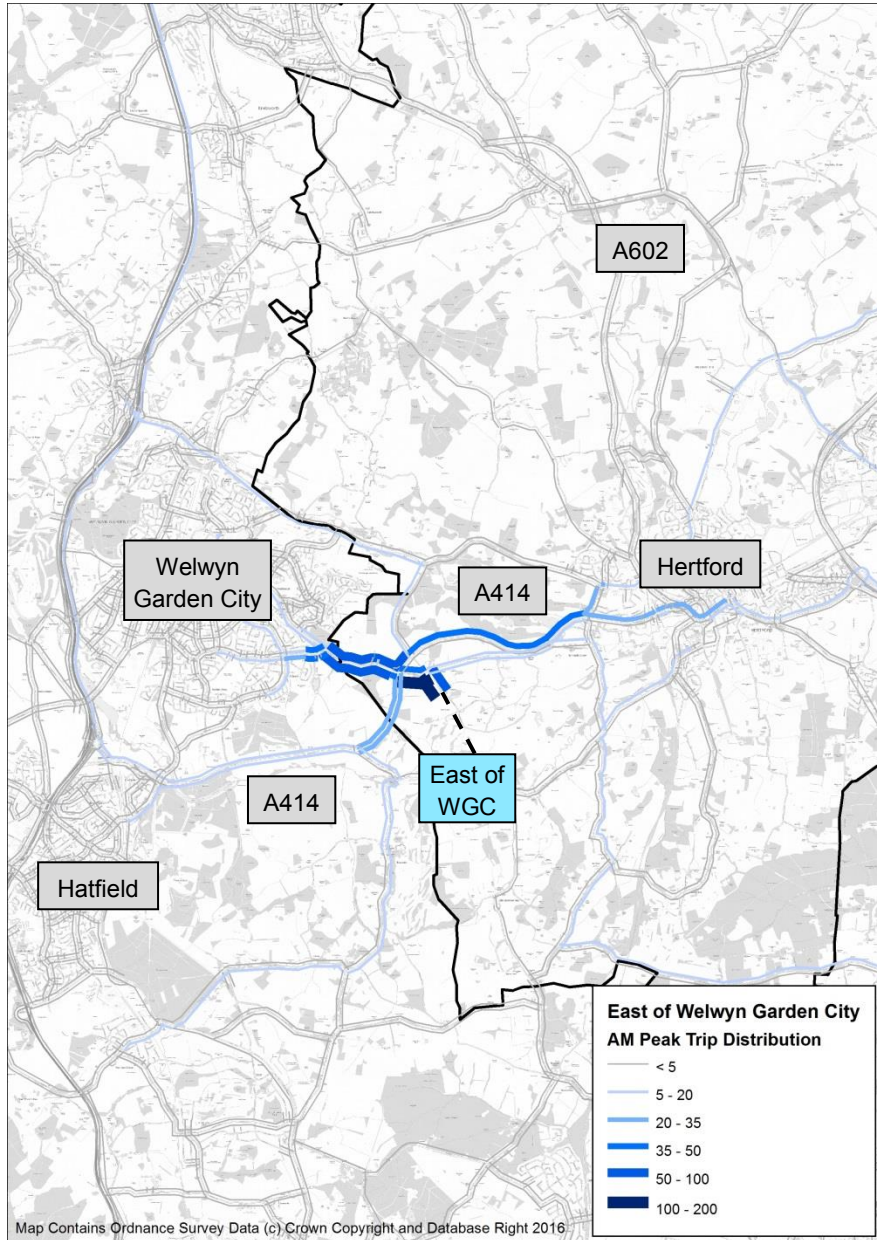
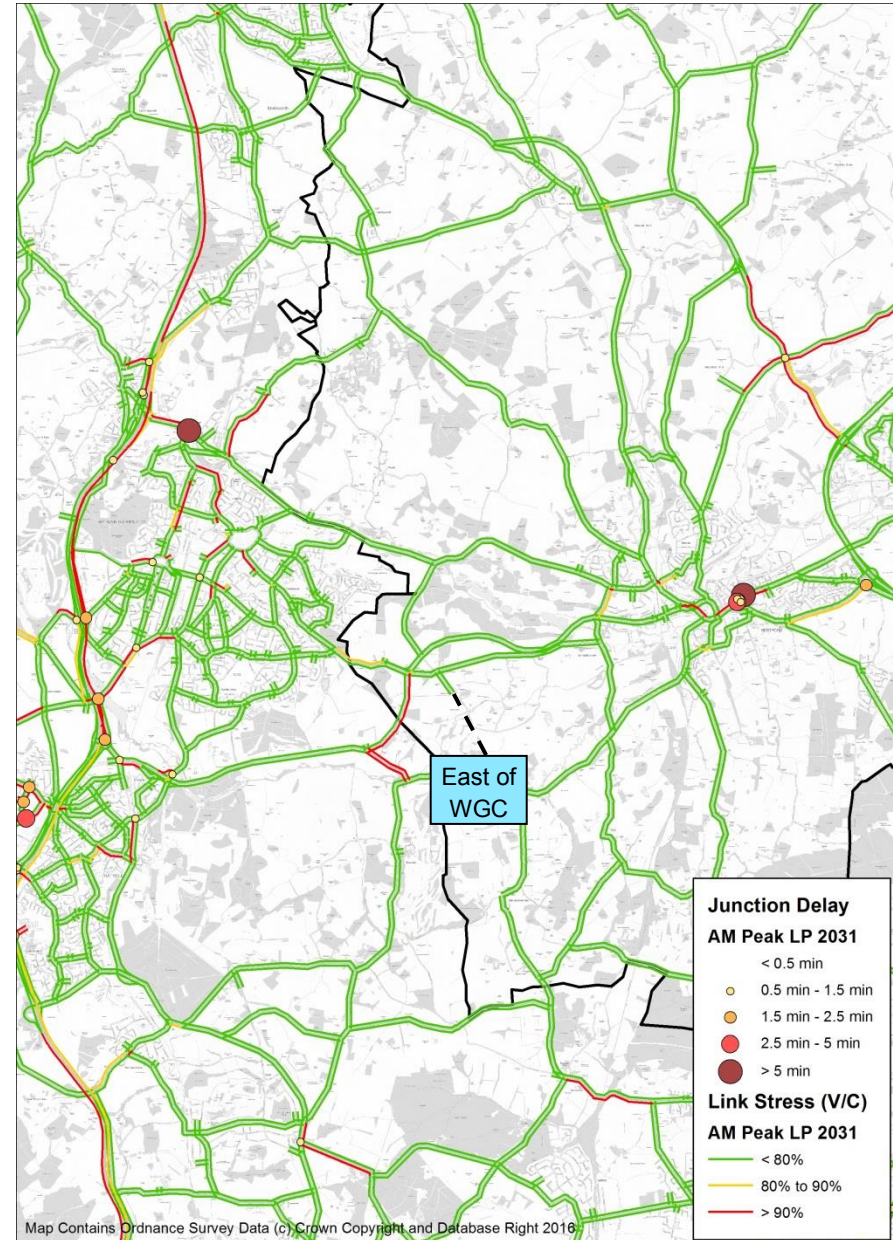


Figure 28. East of Welwyn Garden City AM Peak 2031 Congestion Plot



6. Potential Mitigation Options

6.1.1 Table 3 presents the type of potential mitigation options that may be appropriate at the selected locations shown in Figure 10 and Table 2.

6.1.2 At this stage, these mitigation measures should be interpreted at a very high level, and would require further testing. In addition, it should be noted that potential assessments of any mitigation option (at a later stage, out of the present scope) should rely on a range of indicators which are not limited to congestion.

Table 3. Potential Mitigation Options

ID	Junction Name	Potential mitigation
1	Rush Green Roundabout	Signalisation of B1502 NB approach, or addition of segregated left turn lane from this arm to A414.
2	Bluecoats Roundabout A414 – A119	This junction is physically constrained, and may therefore necessitate a more strategic “non-junction based” mitigation solution to address A414 through-traffic.
3	Eastwick Roundabout A414 – Eastwick Rd	Potential addition of segregated left turn lanes to remove some movements through the roundabout. In the longer term, it is likely that a more sustainable solution will be required for this junction, particularly given local growth aspirations. As part of the proposals for growth in the Gilston Area, the section of Fifth Avenue between the Eastwick Roundabout and the Burnt Mill roundabout will be widened to increase capacity. A second Stort crossing will also be provided.
4	Amwell Roundabout A414 – A1170 – B1502 – B181	Potential conversion to signalised “hamburger-style” to prioritize A414 through-traffic.
5	A1184 – Station Rd – West Rd	Remove roundabouts and replace by signalized junction. Potential to ban right turns, although this may cause problematic re-routing
6	A602 – Anchor Ln – Wadesmill Rd	Signalisation or addition of further flares on all/some approach arms.
7	A602 – Hertford Rd	Signalisation tested in 2031 forecast indicates significant reduction in delay.
8	B1383 – A120	This junction falls outside the East Hertfordshire boundary, and a potential mitigation scheme is being investigated by Essex County Council. Modelling results do not suggest that the Bishop’s Stortford North mitigation scheme sufficiently deals with congestion here.
9	M11 Junction 8	This junction may require a combination of short and long term interventions. A potential mitigation scheme is being investigated by Essex County Council.
10	A120 – A10 – ALL	Strategic modelling does not suggest that a mitigation scheme is required at this junction. Further assessment might be needed to understand the impact of developments and likely mitigation required.
11	A1184 – Thorley St	Strategic modelling does not suggest that a mitigation scheme is required at this junction. Further assessment might be needed to understand the impact of developments and likely mitigation required.
12	A10 – A1170	Strategic modelling does not suggest that a mitigation scheme is required at this junction. Further assessment might be needed to understand the impact of developments and likely mitigation required.

6.2 Sustainable Strategies and Modal Shift

6.2.1 The mitigation options presented in Table 3 are predominantly highway-based capacity upgrade measures at certain junctions in the district where future congestion is expected. Whilst such highway-based capacity upgrades may be necessary and effective in some cases, there is an inherent risk that such measures simply transfer the problem elsewhere in the network.

6.2.2 As an alternative approach, it is suggested that longer term and more sustainable mitigation should be achieved through transport strategies / schemes that promote modal shift (i.e. encouraging trips to be made by walking, cycling or public transport). Encouraging modal shift is of particular importance in new developments before car-dominant travel patterns are established. Potential modal shift strategies are not within the current scope, but may be investigated in further work.

7. Air Quality Management Areas

7.1.1 The locations of Air Quality Management Areas (AQMAs) in East Hertfordshire are shown in Figure 29, Figure 30 and Figure 31. The COMET highway traffic assignment model is not designed to forecast air quality, however, results are provided in the following section on the likely increase in traffic flow (as a proxy for vehicle emissions) between the Base Year and Forecast Year at these locations.

7.1.2 The roads considered in the calculation of traffic increase in the three AQMAs are as follows:

- Hertford
 - A414 southeast of Bluecoats Roundabout
 - A414 southwest of Bluecoats Roundabout
 - A414 adjacent to Castle Gardens
 - A119 Ware Rd
- Sawbridgeworth
 - London Rd
 - Cambridge Rd
 - Station Rd
- Bishop’s Stortford
 - Hockerill St
 - Dunmow Rd
 - London Rd
 - Stansted Rd

7.1.3 The AQMA with the largest increase in traffic is Hertford (+26%), and this significant trend should be investigated further as part of other relevant transport studies in this area.

7.1.4 The increases in Sawbridgeworth and Bishop’s Stortford are more modest (+8% and +2%, respectively). This trend is a result of existing congestion in the Base Year model in these locations, meaning that future traffic growth is effectively limited by the capacity of the junction. In these congested areas, any additional vehicles added to the queues are likely to exacerbate air quality issues.

Table 4. Flow increases at East Hertfordshire AQMAs (2014 – 2031)

AQMA	AM Peak	Inter-peak	PM Peak	Total
Hertford	1946 (+26%)	2155 (+28%)	1527 (+23%)	5628 (+26%)
Sawbridgeworth	209 (+5%)	292 (+7%)	547 (+12%)	1048 (+8%)
Bishop’s Stortford	145 (+3%)	110 (+3%)	34 (+1%)	289 (+2%)

* percentages are rounded to nearest percent

Figure 29. Hertford AQMA

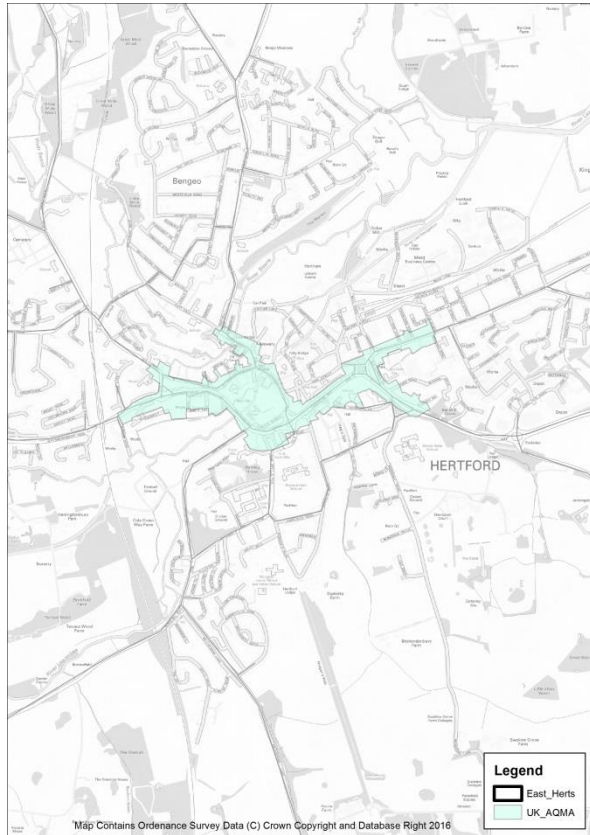


Figure 30. Sawbridgeworth AQMA

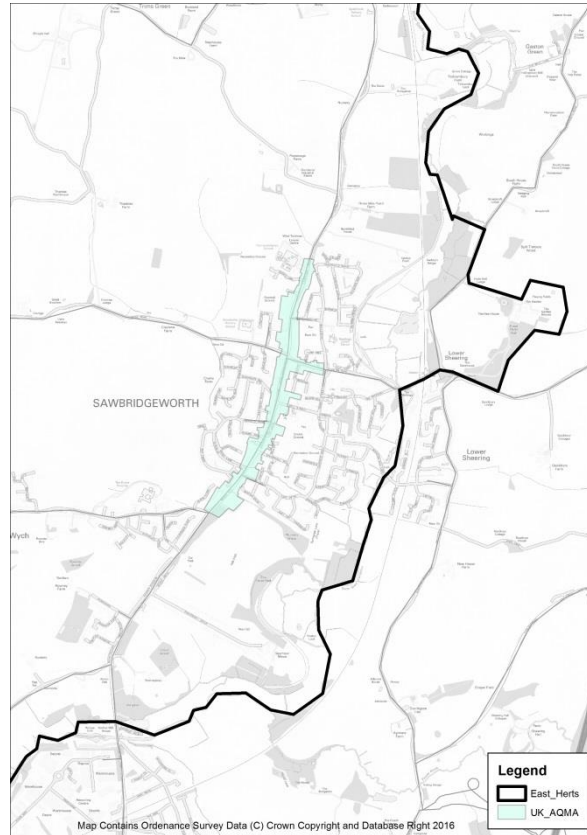
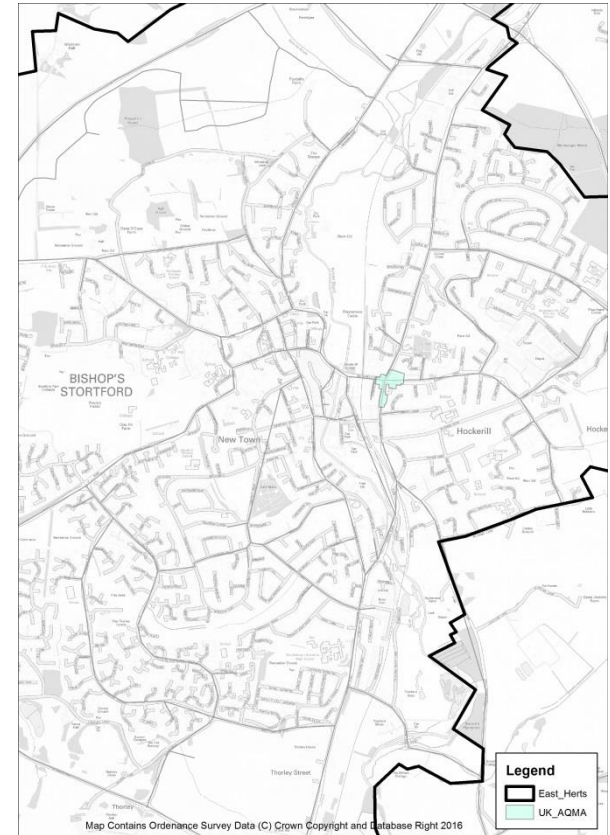


Figure 31. Bishop's Stortford AQMA



8. Summary and Next Steps

8.1 Summary

8.1.1 This document provides strategic level analysis of the highway network performance in East Hertfordshire in support of the District Plan submission in March 2017. The analysis presented here makes use of HCC's COMET models (2014 Base Year and 2031 Forecast Year).

8.1.2 The analysis covers:

- Key selected junctions in East Hertfordshire
- A414 corridor delay through Hertford
- Five proposed major developments in East Hertfordshire
- Air Quality Management Areas

8.1.3 The available model scenarios indicate that highway network congestion in East Hertfordshire is likely to rise between the present day and 2031, particularly at key junctions where delay is already evident. The mitigation of this delay may be achieved through the introduction of new transport infrastructure schemes, some potential options for which are shown in Table 3.

8.2 Next Steps

8.2.1 To test the potential highway mitigation options outlined in this document (Table 3), further modelling work is required, initially at a strategic level. This work will help to develop an evidence base for the appropriateness of any mitigation option.

8.2.2 Notwithstanding the pursuit of highway-based mitigation schemes, scope also exists to explore the development of sustainable transport and modal shift. These schemes should encourage transport through modes such as walking, cycling and public transport.

8.2.3 As stated in section 1, the 2031 COMET Forecast Year includes Local Plan growth in all 10 Hertfordshire districts. Outside Hertfordshire, growth projections are taken from central government (Department for Transport) forecasts (NTEM 7). Given the proximity of East Hertfordshire to neighbouring authorities (which may have Local Plan assumptions that are significantly higher than those envisaged by central government), it may be necessary to produce a 2031 Forecast Year that reflects the Local Plan growth of these neighbouring authorities. In this way, a higher level of cumulative growth (and therefore potential highway impact) can be assessed.

Appendix A – Journey Time Validation Results

Table 5. Journey Time Validation Results

Route	Direction	Observed			Modelled			Difference			% Difference			WebTAG Compliant?		
		AM	IP	PM	AM	IP	PM	AM	IP	PM	AM	IP	PM	AM	IP	PM
Route 5: A414 Central	EB	924	840	1,144	1,007	1,006	1,503	83	166	359	9%	20%	31%	YES	NO	NO
Route 5: A414 Central	WB	1,086	797	871	902	800	1,027	-184	3	156	-17%	0%	18%	NO	YES	NO
Route 6: A414 East	EB	793	756	774	658	568	733	-135	-188	-41	-17%	-25%	-5%	NO	NO	YES
Route 6: A414 East	WB	724	751	762	618	586	593	-106	-166	-168	-15%	-22%	-22%	YES	NO	NO
Route 9: A120	EB	1,108	974	1,226	1,053	909	1,184	-55	-64	-42	-5%	-7%	-3%	YES	YES	YES
Route 9: A120	WB	1,168	949	1,094	1,038	891	1,139	-130	-57	45	-11%	-6%	4%	YES	YES	YES
Route 11: A1184	NB	922	883	983	782	780	870	-141	-103	-112	-15%	-12%	-11%	YES	YES	YES
Route 11: A1184	SB	1,041	849	900	850	788	818	-191	-61	-83	-18%	-7%	-9%	NO	YES	YES
Route 12: A602	EB	769	644	672	653	588	814	-115	-57	142	-15%	-9%	21%	YES	YES	NO
Route 12: A602	WB	768	671	895	618	581	661	-151	-90	-233	-20%	-13%	-26%	NO	YES	NO
Route 13A: A10 (Rush Green - M25)	NB	711	720	817	692	691	757	-19	-30	-60	-3%	-4%	-7%	YES	YES	YES
Route 13A: A10 (Rush Green - M25)	SB	1,032	725	833	716	671	724	-317	-55	-108	-31%	-8%	-13%	NO	YES	YES
Route 13B: A10 (A120 - Rush Green)	NB	361	352	351	356	356	362	-5	4	12	-1%	1%	3%	YES	YES	YES
Route 13B: A10 (A120 - Rush Green)	SB	362	356	340	364	357	358	2	1	18	1%	0%	5%	YES	YES	YES
Route 13C: A10 (A507 - A120)	NB	375	369	370	328	325	339	-47	-44	-31	-12%	-12%	-8%	YES	YES	YES
Route 13C: A10 (A507 - A120)	SB	418	392	385	354	332	333	-64	-60	-51	-15%	-15%	-13%	YES	YES	YES

Appendix B – GEH Results

Table 6. GEH Results

Link ID	Location	Observed AM	Model AM	GEH AM	Observed PM	Model PM	GEH PM
3301-1132	White Stubbs Ln	199	355	9.38	347	729	16.47
3482-1195	A10	1817	1879	1.44	1798	1796	0.04
3373-1212	Hoddesdon Rd	213	209	0.29	214	147	5.01
3561-1241	Rye Rd	61	337	19.58	47	342	21.15
3430-3035	A1184	633	427	8.93	817	514	11.73
10012-3042	Harmer Green Ln/Burnham Green Rd	286	37	19.57	47	313	19.85
3449-3043	B1004	655	516	5.73	507	501	0.27
3128-3053	B1197	236	133	7.59	437	223	11.77
3550-3063	A1170	544	533	0.49	539	572	1.41
3518-3066	B180	177	147	2.40	131	125	0.57
3417-3080	A1184	521	729	8.33	741	923	6.31
3472-3122	B1502	276	345	3.91	493	433	2.78
3471-3128	Watford_A414	1466	1568	2.61	1190	1232	1.20
3053-3128	B1197	426	277	7.92	347	172	10.87
3309-3139	Brickendon Ln	158	0	17.78	73	0	12.08
3584-3160	Colsfoot Lane	87	121	3.32	36	48	1.88
3558-3162	A119	216	148	5.07	467	388	3.85
3338-3165	B158	499	602	4.37	318	557	11.41
3457-3189	B1383	451	617	7.19	512	524	0.52
11292-3203	A1250	1023	941	2.61	747	725	0.83
3605-3251	The Old Coach Rd/Hertingfordbury Rd	80	34	6.16	67	43	3.30
3589-3274	Bragbury Ln	166	135	2.50	32	53	3.17
10400-3288	Watford_A414	823	765	2.04	1432	1376	1.49
3604-3289	Watford_A414	1522	1251	7.28	1190	1228	1.08
10397-3290	B1000	277	259	1.11	610	333	12.74
3581-3290	B1000	95	208	9.15	156	283	8.56
3578-3291	Benington Rd	69	76	0.81	51	277	17.65
7294-3292	B1037	305	342	2.03	229	465	12.67
10403-3294	B158	282	509	11.40	575	931	12.99
3576-3295	B1037	198	218	1.38	173	425	14.58
5291-3295	Unnamed Road	26	9	4.08	20	3	5.09
3589-3296	A602	905	913	0.28	941	931	0.34
3461-3297	Unnamed Rd	17	9	2.23	11	7	1.18
1132-3301	White Stubbs Ln	318	587	12.65	117	305	12.93
3307-3305	B158	260	641	17.95	293	893	24.63
3305-3307	B158	434	599	7.24	468	733	10.82
3139-3309	Brickendon Lane	79	0	12.57	131	0	16.19
3583-3310	Tattle Hill/Bramfield Rd	116	155	3.38	39	62	3.27
3559-3323	Sacombe Rd	160	47	11.12	135	55	8.20

Link ID	Location	Observed AM	Model AM	GEH AM	Observed PM	Model PM	GEH PM
3165-3338	B158	343	492	7.28	412	690	11.84
3544-3340	A119	400	206	11.17	340	54	20.36
3490-3344	B1502	459	534	3.37	444	746	12.37
3364-3347	A10	1532	1656	3.10	2186	1887	6.63
3347-3364	A10	1990	1958	0.72	1996	1832	3.74
1212-3373	Hoddesdon Rd	204	314	6.81	193	242	3.34
3568-3376	A10	1189	985	6.17	711	460	10.36
3551-3378	Cappell Ln	208	398	10.90	198	350	9.16
3385-3383	B1368	76	88	1.27	147	117	2.63
3383-3385	B1368	157	146	0.91	97	111	1.39
3565-3402	Unnamed Rd	38	135	10.44	26	133	11.99
3415-3407	B1004	447	451	0.17	233	263	1.89
3412-3408	Unnamed Rd	4	0	2.83	2	0	2.00
3408-3412	Unnamed Rd	4	0	2.83	2	0	2.00
3513-3414	High Wych Rd	405	242	9.04	781	528	9.88
3407-3415	B1004	187	199	0.86	360	412	2.64
3530-3416	A120	720	665	2.10	766	679	3.22
3437-3416	A120	786	787	0.05	921	891	1.00
3080-3417	A1184	630	1039	14.17	647	954	10.86
3035-3430	A1184	699	505	7.93	762	428	13.70
3416-3437	A120	820	759	2.17	834	621	7.90
3456-3445	Pig Lane	188	367	10.75	202	424	12.54
3043-3449	B1004	476	622	6.25	690	795	3.87
3456-3453	A1060	568	595	1.11	404	496	4.33
3453-3456	A1060	452	335	5.90	457	473	0.73
3445-3456	Pig Lane	249	570	15.85	158	447	16.63
3189-3457	B1383	523	390	6.21	548	461	3.90
3297-3461	Unnamed Rd	10	8	0.49	13	1	4.67
3128-3471	Watford_A414	878	643	8.51	1520	1281	6.37
3122-3472	B1502	495	381	5.44	546	464	3.63
1195-3482	A10	1436	1446	0.25	2079	2107	0.61
3344-3490	B1502	282	198	5.42	397	480	3.98
3591-3494	A1170	693	434	10.90	677	526	6.14
3414-3513	High Wych Rd	676	650	0.99	388	432	2.16
3066-3518	B180	116	115	0.10	172	188	1.19
3416-3530	A120	583	579	0.15	711	647	2.45
3340-3544	A119	390	162	13.74	546	284	12.88
3063-3550	A1170	501	480	0.93	575	539	1.51
3378-3551	Cappell Ln	60	265	16.08	71	466	24.10
10395-3556	B195	554	824	10.30	624	621	0.11
3162-3558	A119	451	376	3.67	152	205	3.99

Link ID	Location	Observed AM	Model AM	GEH AM	Observed PM	Model PM	GEH PM
3323-3559	Sacombe Rd	159	75	7.73	51	117	7.24
1241-3561	Rye Rd	40	186	13.73	61	160	9.44
3402-3565	Unnamed Rd	25	99	9.40	35	178	13.87
3376-3568	A10	696	577	4.73	1262	900	11.00
3295-3576	B1037	210	337	7.66	161	175	1.08
3291-3578	Benington Rd	35	89	6.85	90	85	0.49
3290-3581	B1000	177	227	3.54	86	339	17.38
3310-3583	Tattle Hill/Bramfield Rd	46	65	2.60	81	180	8.70
3160-3584	Colsfoot Lane	40	43	0.52	87	129	4.08
3587-3585	Watton Rd	157	131	2.19	182	254	4.88
3585-3587	Watton Rd	223	139	6.25	159	100	5.14
3296-3589	A602	810	805	0.17	1033	842	6.24
3274-3589	Bragbury Ln	27	34	1.33	169	173	0.29
3494-3591	A1170	578	305	12.99	682	438	10.29
3289-3604	Watford_A414	977	941	1.16	1336	1258	2.17
3251-3605	The olde coach road	63	10	8.69	82	11	10.42
3295-5291	Unnamed Road	23	5	4.71	22	37	2.69
7286-5544	Watton Rd	239	137	7.47	109	130	1.94
5544-7286	Watton Rd	86	137	4.84	342	235	6.29
3292-7294	B1037	231	374	8.23	278	358	4.48
3042-10012	Harmer Green Ln/Burnham Green Rd	65	516	26.46	301	48	19.13
3556-10395	B195	391	466	3.61	594	794	7.60
3290-10397	B1000	683	218	21.88	306	336	1.67
10408-10398	Tylers Causeway	303	392	4.76	76	107	3.19
3288-10400	Watford_A414	1373	1449	2.01	1024	1115	2.78
3294-10403	B158	496	782	11.31	343	612	12.30
10398-10408	Tylers Causeway	63	139	7.58	343	219	7.39
3203-11292	A1250	752	715	1.37	840	826	0.47

Appendix C – Town Based Trip Distribution Plots

Figure 32. AM Peak Outbound trips from Bishop's Stortford⁷

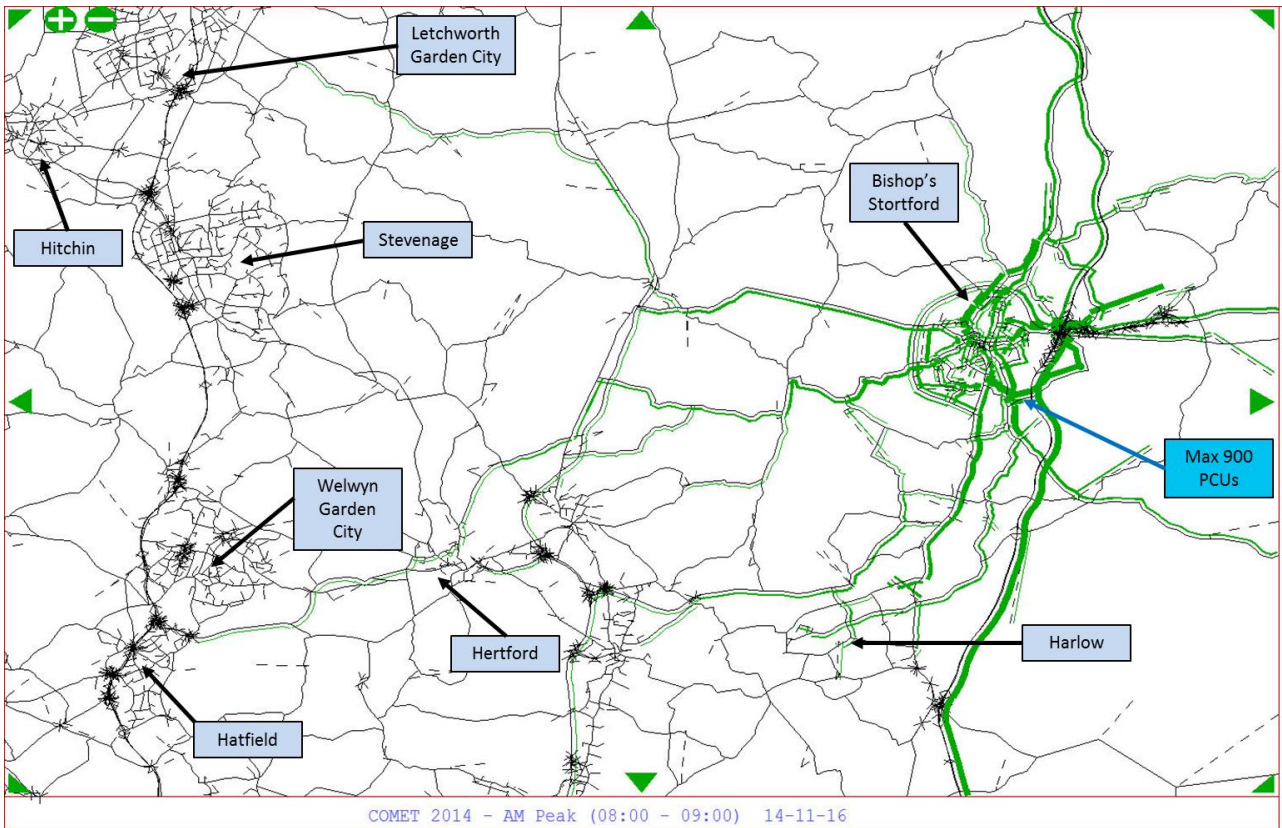


Figure 33. PM Peak Inbound trips to Bishop's Stortford⁷

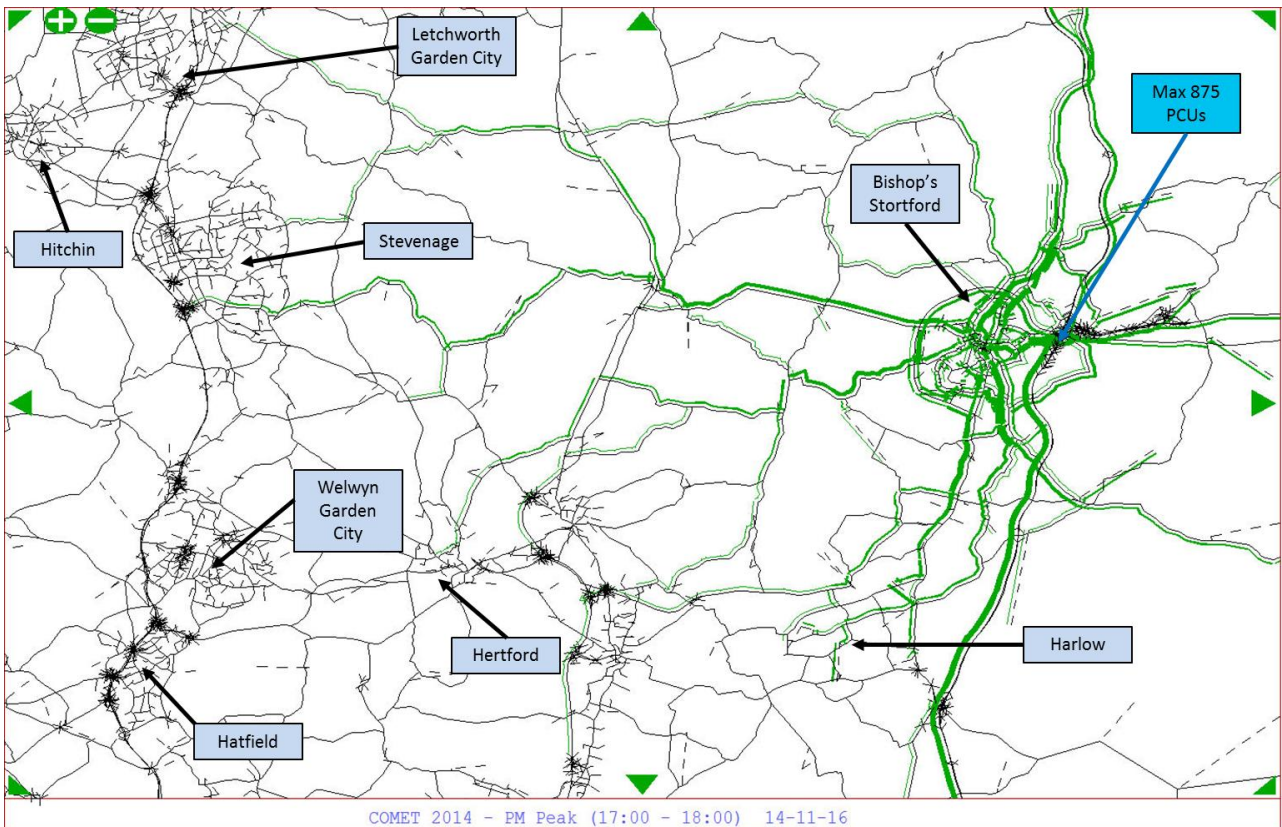


Figure 34. AM Peak Outbound trips from Hertford⁷

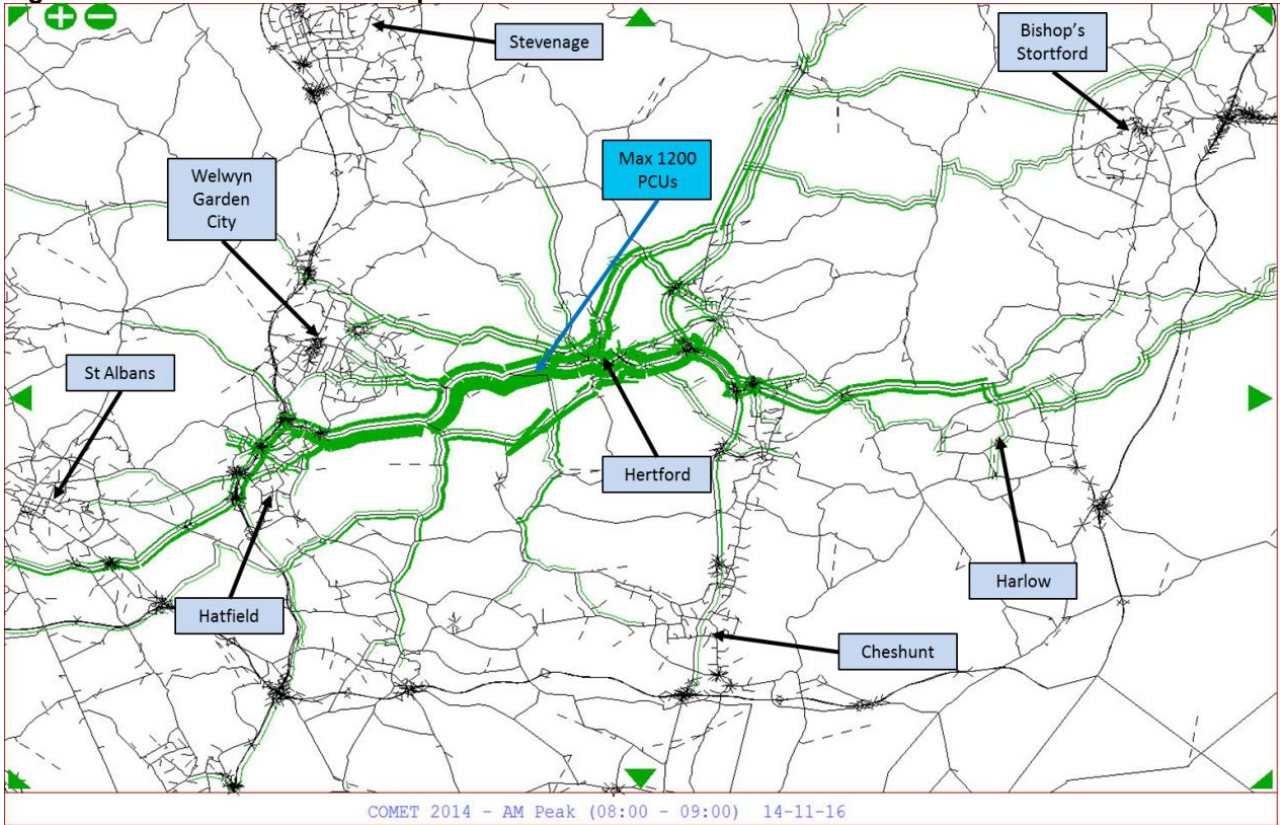
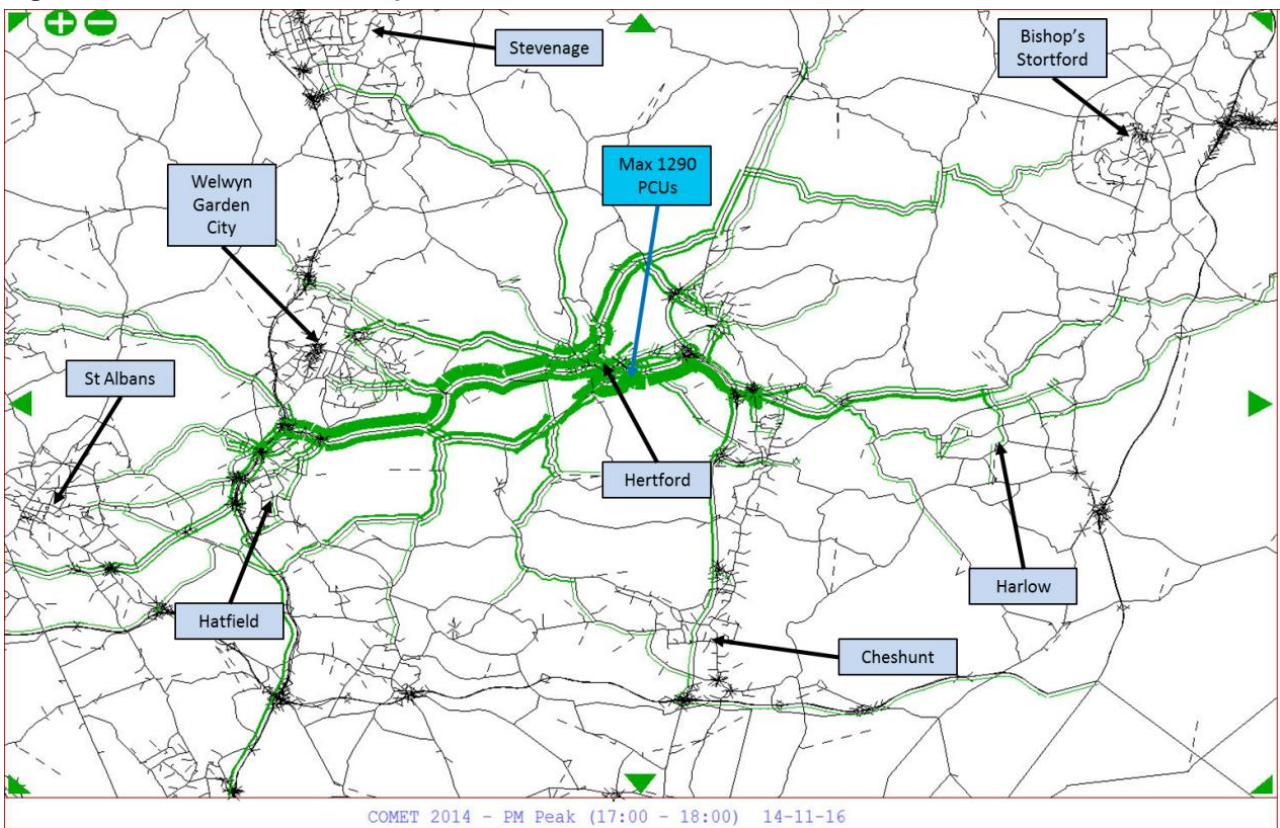


Figure 35. PM Peak Inbound trips to Hertford⁷



Appendix D – A414 Hertford Corridor Analysis

Figure 36. PM Peak Journey Time A414 – Westbound

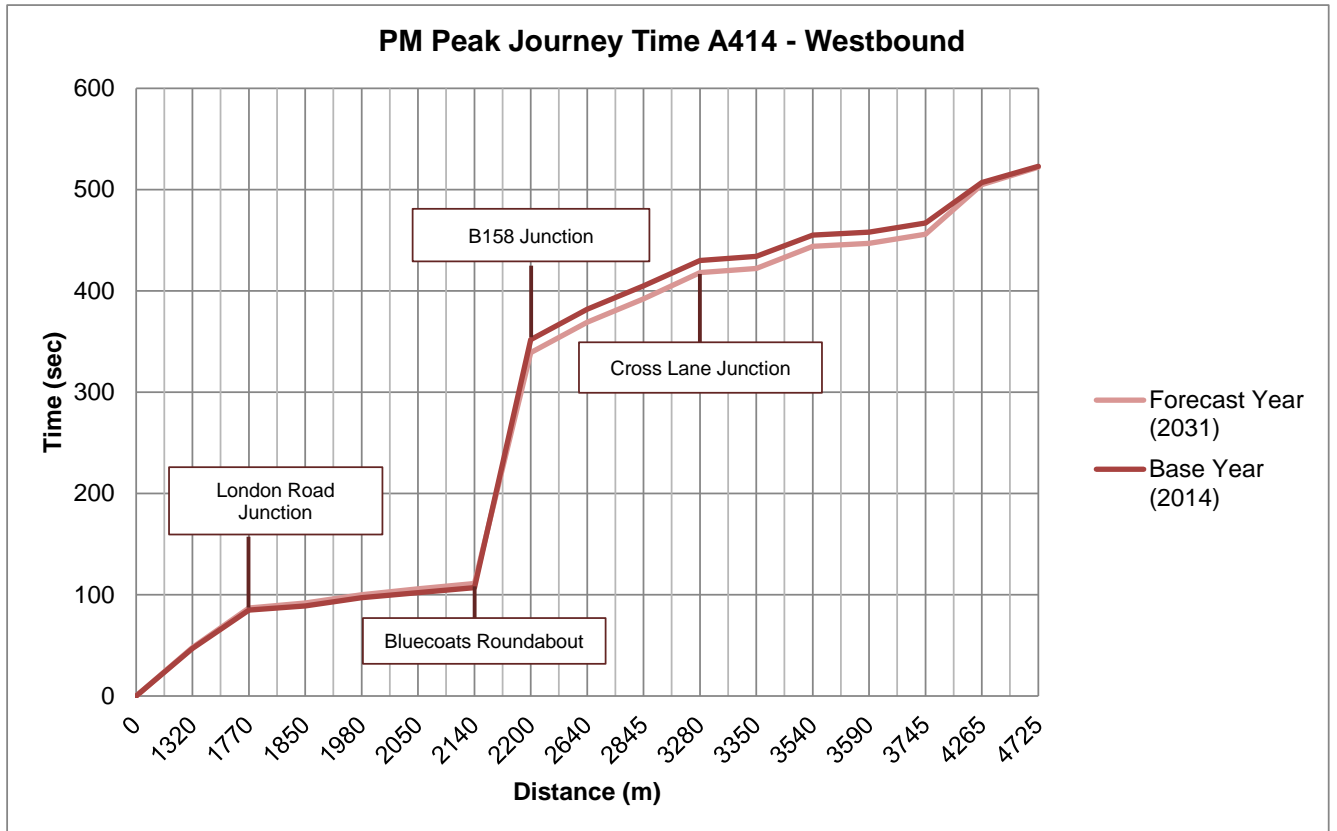
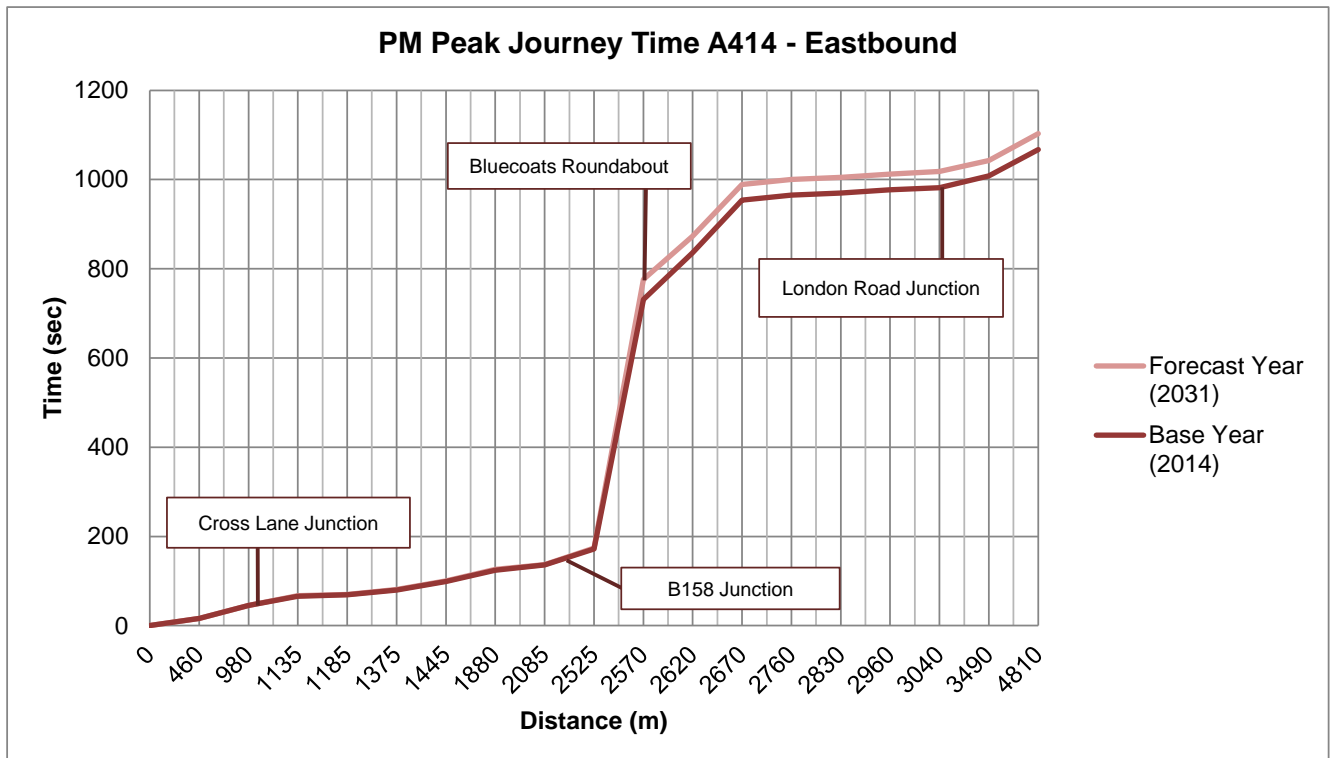


Figure 37. PM Peak Journey Time A414 – Eastbound



Appendix E – Glossary of Terms

WebTAG

WebTAG stands for *Web* (i.e. online) *Transport Analysis Guidance*, and is set out by The Department for Transport (<https://www.gov.uk/guidance/transport-analysis-guidance-webtag>). WebTAG contains guidance on the conduct of transport studies, and is considered the standard against which transport planning work in the UK is assessed. In transport modelling, the term “WebTAG compliant” means that WebTAG guidance is met in relation to that particular performance criterion.

Volume over Capacity (V/C)

This is the ratio of volume over capacity (V/C) for a given link. Links are generally considered to be approaching capacity at 80% V/C, beyond which there is a material deterioration in operation. Note that the length of the modelled queue on amber/red links in congestion plots is not related to the length of the link in the diagram. The V/C value calculated by SATURN relates to the link as a whole, however, the queue may not extend along the whole link (particularly if the link is long). The extent of the queueing should therefore also be interpreted using the junction delay circles.

GEH

GEH is a statistic that compares the modelled flow versus observed flow, and is defined in section 3.2.7 of WebTAG Unit M3.1 – Highway Assignment Modelling.

PCU

Passenger Car Unit (used in Transport Modelling). Cars and LGVs equal 1 PCU, whilst HGVs equal 2.2 PCUs

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 9 MARCH 2017

REPORT BY LEADER OF THE COUNCIL

APPROACH TO MASTERPLANNING AND DELIVERY OF STRATEGIC SITES

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report sets out the background and advantages of adopting a Masterplanning approach to development within East Herts.

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

(A)	the approach to Masterplanning set out in this report, be agreed to support the delivery of sites allocated for development in the emerging District Plan.
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1.0 Background

1.1 The District Plan sets out the Council's planning framework to guide future development and the use of land in the district. It identifies how East Herts will grow and develop whilst at the same time maintaining its attractiveness as a place to live, work and visit. The Plan covers the period 2011–2033. Once adopted, the policies in the District Plan will replace the policies in the Local Plan 2007.

1.2 The District Plan includes a series of site specific policies which establish the principle of development in locations across the district and identify what a planning application is expected to address. For the strategic sites (generally those over 500 homes) the District Plan sets out a specific policy requirement that prior to the submission of any planning application, a Masterplan should be prepared.

1.3 This report provides further information for Members on the role of Masterplans and seeks agreement to a process whereby Masterplans are collaboratively prepared and agreed to ensure high quality, well designed, sustainable places which embrace new technologies and construction techniques and have been developed with full community involvement.

2.0 Report

2.1 The District Plan sets out the expectation that a Masterplan will be prepared, prior to the submission of any planning application, for the following sites:

- Bishop's Stortford North (Policy BISH3)
- Bishop's Stortford South (Policy BISH5)
- Land North and East of Ware (Policy WARE2)
- The Gilston Area (Policy GA1)
- Land East of Stevenage (Policy EOS1)
- Land East of Welwyn Garden City (Policy EWEL1)

In addition, it is anticipated that masterplanning of the town centre sites in Bishop's Stortford will be informed by the ongoing work on the Bishop's Stortford Town Centre Planning Framework.

2.2 Whilst there is no policy requirement for other sites allocated in the District Plan to produce a Masterplan, it is considered good practice and as such there will be an expectation that all site promoters should do a Masterplan. This report establishes this principle and seeks to ensure that a Masterplan approach is taken where appropriate.

2.3 The role of a Masterplan will be to:

- elaborate on the development principles that will guide development;
- show how these principles can be delivered through an indicative spatial layout;
- clarify arrangements for delivery and phasing;
- provide more explicit advice regarding infrastructure contributions; and
- provide a mechanism for public engagement on the future shape of the sites.

2.4 Masterplans should be:

- visionary, raising aspirations for an area;
- deliverable, taking into account likely constraints and implementation timescales;
- flexible, allowing for changing circumstances and new opportunities;
- inclusive, being prepared with participation from local communities; and
- adaptable, allowing for existing areas to be thought of differently.

2.5 A typical Masterplan might show:

- how streets and open spaces are to be connected;
- define the height, bulk and massing of buildings;
- set out the suggested relationship between buildings and public spaces;
- determine the uses which will take place in an area;
- identify the movement patterns for people on foot, or by bicycle, car or passenger transport;
- set out the basis for the provision of utilities and other infrastructure;
- relate the physical form of the site to local social and economic circumstances, taking into account the needs of people living and working in the area; and
- show ways in which new developments can be integrated into existing communities, and the built and natural environments.

2.6 Community support in its widest sense is essential to the successful delivery of development, and site promoters will be expected to work with the Council to ensure this is carried out in a meaningful manner. As such it is expected that Masterplans will be collaboratively prepared involving site promoters, landowners, East Herts Council, Hertfordshire County Council, town and parish councils, local communities, Neighbourhood Plan forums where appropriate and other key stakeholders.

2.7 Masterplans will sit alongside the District Plan and will be a material consideration when determining planning applications on sites. They will not be part of the statutory development plan, but will be endorsed by the Council. Whilst this Council has not historically adopted Masterplans as Supplementary Planning Documents (SPDs) consideration will be given to this approach where appropriate. The NPPF is clear that SPDs should only be considered where they are clearly justified, for example where they can help applicants make successful applications or aid infrastructure delivery. They should not be used to add

unnecessarily to the financial burdens on development. An SPD approach is proposed for the East of Welwyn Garden City site as this is allocated for development in both the Welwyn Hatfield Local Plan and the East Herts District Plan and an SPD would ensure a consistent approach across the whole site.

- 2.8 Having an agreed Masterplan that has been subject to public consultation is considered to be the most effective way of ensuring that the planning application stage is straightforward, and as such will speed up the decision making process. It will also ensure that the optimum level of developer contributions to infrastructure and mitigation of development impacts can be achieved.
- 2.9 It is anticipated that Masterplans should be considered by the District Planning Executive Panel. Members would also have the opportunity be involved in the Masterplanning process as key local stakeholders.
- 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

None

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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:	It is expected that Masterplans will be collaboratively prepared involving site promoters, landowners, East Herts Council, Hertfordshire County Council, town and parish councils, local communities, Neighbourhood Plan forums where appropriate and other key stakeholders.
Legal:	None
Financial:	It will be necessary to pursue early Planning Performance Agreements (PPAs) to ensure that necessary resources are in place in terms of funding and staff to bring forward Masterplans.
Human Resource:	It will be necessary to pursue early Planning Performance Agreements (PPAs) to ensure that necessary resources are in place in terms of funding and staff to bring forward Masterplans.
Risk Management:	Having an agreed Masterplan that has been subject to public consultation is considered to be the most effective way of ensuring that the planning application stage is straightforward, and as such will speed up the decision making process.
Health and wellbeing – issues and impacts:	Masterplanning 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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