

ESSENTIAL REFERENCE PAPER 'B'

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5.2.43	Quoted distances to other towns are significantly incorrect and no mention is made of the standard of the roads involved	Cllr Bull	Agreed. Quoted mileages between settlements to be checked for all settlement descriptions and amended to reflect travel distances, as appropriate.
5.2.43	Buntingford is not a main town as stated.	Cllr Bull	Not agreed. Buntingford is designated as one of the six main settlements in the 2007 Local Plan. In the proposed District Plan hierarchy it will be one of the five main towns of East Herts.
5.2.43	The town is not at all inaccessible; it is relatively inaccessible by public transport.	Cllr Bull	Agreed. This sentence to be amended to say "inaccessibility of the town by public transport..."
5.2.43	No evidence whatsoever is presented to justify the assertion that a 'relatively large population' works from home.	Cllr Bull	Not agreed. There is no assertion that a large population works from home. The paragraph says "it is also possible that a relatively large proportion of those in work do so from home..." This comes from advice provided from our consultant on strategic economic planning and is based on changing work patterns and trends. Census data variations

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			over the last three decades confirm these trends.
5.2.47 & 5.2.70	The reference to a remote possibility of a new railway line beyond the current planning period is irrelevant and should be removed.	Cllr Bull	<p>Agreed. Paragraphs 5.2.47 and 5.2.70 to be amended to read:</p> <p>Investment barriers: The greatest barriers preventing large scale employment development are the lack of access to motorway and rail services and the distance of Buntingford from other major employment centres. Small-scale employment development would be able to fit into the existing infrastructure available in the town without the need to invest in new infrastructure.</p>
5.2.48	No informed analysis of demand for and supply of employment sites is provided in Section 5.2.43 to 47 to justify the statements made.	Cllr Bull	Not agreed. This information is provided by our strategic economic planning and viability consultants. This is based on trends presented by Experian and Goad survey data, demographic profiles based upon Census data and the knowledge gathered through extensive experience.

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5.2.49 - 5.2.62	Regarding areas in Area 6 West of the A10, the report concludes these areas are not suitable for housing but may be considered for employment sites. The provision of new employment sites in the rural area is fully supported, but whilst the extension of the business park in 6A West of the A10 is very sensible and sustainable, the use of the area in 6C West of the A10 would be inappropriate in this rural environment bearing in mind the existing Employment Area in 6B to the West of A10 which is suitably tucked away.	Cllr Ranger	Noted and acknowledged.
5.2.50	The discussion on Area 6 fails to acknowledge that expansion of the Buntingford Business Park involves incursion into open countryside contrary to national and current local policy.	Cllr Bull	Agreed. New wording to be added to read "In terms of impact, the existing business park is well screened from the road by bunds and vegetation. Any expansion would need to occur to the north of the existing buildings into open land within the confines of the business park.
5.2.63	Park Farm Estate would not represent an ideal location for retail premises. Paragraph 5.3.42 refers to this location as being "at the top of the High Street". It is several hundred yards north of	Cllr Bull	Agree with the points raised. The paragraph is written in a way to raise the point for consideration among several options that should be considered for this area of search. If

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	any other shops and separated from the High Street by a residential area. The centre of gravity of the High Street is south of Church Street and about a quarter of a mile away. No justification is given for the need to consider such a development and it could well lead to the undermining of what is a genuinely successful town centre.		the town as a whole increases in size there may be a need for more retail opportunities. This area of search should therefore consider this potential need. Further work would be needed to determine the impacts of any options given consideration in this location and the whole town.
5.3.35	It is wrong to say that poor provision of accessible natural green space is an issue in Buntingford. The town benefits from a good network of footpaths leading into and around the local countryside which can be reached in a few minutes from anywhere in the town.	Cllr Bull	Not agreed. This statement is founded in the Green Infrastructure Plan for East Herts. It uses specific criteria for Accessible Natural Greenspace (or ANG) derived from standards set by Natural England and the Woodland Trust. This assessment is based upon specific open space typologies (old PPG17 terminology) and designated open spaces with public access.
5.3.37	It is wrongly stated that there is a possibility of accessing the land bordering the bypass (sub area B) by way of Longmead (only 4.87m wide) and off Baldock Road. This possibility was removed in 2011 when outline planning	Cllr Bull	Not agreed. Permissions do not preclude changes from being made to enable access. The point of this paragraph is about whether there is the potential to gain access to this area of search and whether a new

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	<p>permission was given for the two separate developments on sites 02/003 and 02/010. The only practical possibility is for access by way of Luynes Rise or the construction of a new access road off the A10 bypass in the vicinity of the sewage works. This observation is relevant also to the discussion in 5.2.54 on employment opportunities on this site.</p>		<p>development could be well integrated. The implications of access issues on the employment potential of the area of search are noted.</p>
5.3.45	<p>This section details a new north-south route across the area of search to connect the Causeway with Hare Street. This proposal would be inappropriate given characteristics of the area and the paragraph should be amended to remove this route.</p>	Cllr Bull	<p>The urban form sections are written from the perspective of: <i>'if this area were to be developed, what would be the best approach for urban form'</i>. For that reason, any conclusions drawn should not be read in isolation, as any final decisions will always be a balance of planning judgements. However, for clarity and the avoidance of doubt, the following re-worded text is suggested:</p> <p>Structure and Connectivity: The area is within 800m /10 minutes of the town centre. The obvious connections are to Hare Street Road to the south, although this alone would</p>

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			<p>be insufficient to stitch the development into the town. An existing Public Right of Way runs diagonally northwest to southeast across the area: a course which is seemingly incongruous with the structure and layout of the town since the defining feature of Buntingford is its north-south axis sitting in the narrow valley of the Rib. However, this characteristic stems from the Right of Way being an historic route where the incongruity results from later development and not the footpath itself. This is strengthened by the linear nature of Sunny Hill, Archers and Paddock Road to the west. From an urban form perspective therefore, it is considered appropriate to continue this structure by providing a new direct north-south route connecting The Causeway with Hare Street Road. Such a proposal would need to acknowledge topography, and also be acceptable in highway and landscape terms. Doing so would of course involve a land swap with Layston School, whose axis would alter from east-west to the north of the site to north-</p>

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			south adjacent to the existing built form and effectively forming a buffer between existing and new development.
5.3.45	The commentary shows a lack of understanding of Buntingford and its historical development when referring to an existing public right of way that runs diagonally northwest to southeast as “seemingly incongruous with the structure and layout of the town”. This is a historic right of way connecting Buntingford town centre via the ford across the river at River Green to Hare Street and other villages to the east. The same paragraph proposes a north - south route that would cause a whole string of environmental, heritage, highway and road safety problems on the eastern side of the town. This whole section should be rewritten.	Cllr Bull	<p>The urban form sections are written from the perspective of: <i>‘if this area were to be developed, what would be the best approach for urban form’</i>. For that reason, any conclusions drawn should not be read in isolation, as any final decisions will always be a balance of planning judgements. However, for clarity and the avoidance of doubt, the following re-worded text is suggested:</p> <p>Structure and Connectivity: The area is within 800m /10 minutes of the town centre. The obvious connections are to Hare Street Road to the south, although this alone would be insufficient to stitch the development into the town. An existing Public Right of Way runs diagonally northwest to southeast across the area: a course which is seemingly incongruous with the structure and layout of the town since</p>

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			<p>the defining feature of Buntingford is its north-south axis sitting in the narrow valley of the Rib. However, this characteristic stems from the Right of Way being an historic route where the incongruity results from later development and not the footpath itself. This is strengthened by the linear nature of Sunny Hill, Archers and Paddock Road to the west. From an urban form perspective therefore, it is considered appropriate to continue this structure by providing a new direct north-south route connecting The Causeway with Hare Street Road. Such a proposal would need to acknowledge topography, and also be acceptable in highway and landscape terms. Doing so would of course involve a land swap with Layston School, whose axis would alter from east-west to the north of the site to north-south adjacent to the existing built form and effectively forming a buffer between existing and new development.</p>
5.3.50	There are no allotments in the area referred to.	Cllr Bull	Agreed. Wording to be changed to: "The area

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	The space is occupied by a wildlife area.		is bounded by playing fields and an informal wildlife area (non-designated) to the north.
5.3.51	There is already good access to the countryside through the area referred to by way of well used footpaths. Any eastward extension of Buntingford would not enhance this.	Cllr Bull	Agreed. Wording to be changed to: “in addition to the open space referred to above, an eastward extension of the built-up area should be designed with an appropriate layout to incorporate and extend existing footpaths to ensure access to the wider countryside is retained. Such access could be enhanced through the provision of green wedges and enhanced tree belts”.
5.3.52	Paragraph states that “all areas offer opportunities for commercial and community facilities ...” but this conclusion is not justified by the earlier text or realistic interpretation of the facts.	Cllr Bull	Not agreed. There is a potential in any of the areas of search given their size to be able to accommodate and facilitate community facilities or commercial units. This paragraph does not state what form these should or would take.
5.3.53	Nowhere in the preceding paragraphs of chapter 5 is there any justification for the statement made that growth of around 500 dwellings would be appropriate. The impression given is that a decision to allocate this number of dwellings has	Cllr Bull	Not agreed. This figure is based upon the previous technical work undertaken during the plan-making process – Chapters 3 and 4. Initial scale assumptions were devised as a tool for undertaking consistent assessments of

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	<p>been made on an unexplained basis and that the Buntingford section of chapter 5 is a poor attempt to dress it up as a reasonable figure. The subsection should start with just meeting local demand/need for housing during the period of The Plan, not be based on a minimum of 500 dwellings for which no justification has been provided.</p>		<p>each area of search in Chapter 3. Sieve 1 of Chapter 4 assessed each area of search in detail. At this stage the initial scale assumptions were revised. Sieve 2 of Chapter 4 revised these scale assumptions further in response to the consideration of the settlement as a whole. At this stage it was considered necessary to carry forward a range of scenarios for Buntingford of up to 2,000 dwellings for further detailed assessment. Paragraph 5.3.53 asserts that based on the urban form analysis alone, Buntingford should see a much smaller level of growth.</p>
Chapter 5	<p>Cannot accept that 'based on the evaluation of economic matters' the overall figures are right for Hertford. That is not a conclusion that seems possible to be drawn from the text as presented to the 28th November meeting.</p> <p><i>[See also following comments].</i></p>	Cllr Ruffles [#]	<p>Not agreed. The evaluation of economic matters is one of many strands in the consideration of the overall strategy for the district. While individual areas of search may not necessarily be suitable for accommodating employment opportunities in themselves, the overall conclusion in respect of Hertford is that the opportunities offered either in the town or in other locations beyond that could be</p>

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			<p>accessed by sustainable transport means would be likely to meet the needs of an increased population of the scale suggested.</p> <p>In planning for the whole district's housing needs at a strategic level for the plan period a wider view has to be taken that balances many considerations.</p>
5.2.97	<p><i>See comment regarding Chapter 5, above to set context for:</i></p> <p>There is the acknowledgement that delivery of further dwellings to the full number which the district of Mead Lane could accommodate is very unlikely during the Plan period.</p>	Cllr Ruffles [#]	Not agreed. There is no reason to suppose that the numbers of dwellings outlined in the draft Mead Lane Urban Design Framework could not be achieved over the plan period provided that the enabling infrastructure measures are put in place.
5.2.103	<p><i>See comment regarding Chapter 5, above to set context for:</i></p> <p>'It is considered unlikely that significant additional employment opps would be created' for 600 dwellings to the West of the town</p>	Cllr Ruffles [#]	Not agreed. While individual areas of search may not necessarily be suitable for accommodating employment opportunities in themselves, the overall conclusion in respect of Hertford is that the opportunities offered either in the town or in other locations beyond would be likely to meet the needs of an

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5.2.110	<p><i>See comment regarding Chapter 5, above to set context for:</i></p> <p>To the North of the town the figure of 100 new dwellings is clearly not considered sensible in view of the stated fact that <i>'it is considered unlikely that significant employment development would be appropriate..... for the level of residential development proposed'</i>.</p>	Cllr Ruffles [#]	<p>increased population of the scale suggested.</p> <p>Not agreed. While individual areas of search may not necessarily be suitable for accommodating employment opportunities in themselves, the overall conclusion in respect of Hertford is that the opportunities offered either in the town or in other locations beyond would be likely to meet the needs of an increased population of the scale suggested.</p>
5.3.54 & 5.3.70 (seen as conflicting)	<p><i>See comment regarding Chapter 5, above to set context for:</i></p> <p>Underlying all concerns is the simple word 'character'. Hertford as a good place to live (surely a characteristic which, partisan or not, all would see as right and laudable as the future is planned) is dependent on 'size' above all. A character change of hugely damaging proportion will follow, inevitably, if the District Plan proposed figures for housing development are adopted.</p>	Cllr Ruffles [#]	<p>The evaluation of urban form, or 'character', matters is one of many strands in the consideration of the overall strategy for the district.</p> <p>There is no 'accepted violation' of Hertford's Green Fingers. The Urban Form section does, however, discuss the implications of accommodating dwellings and explains how development could be accommodated to least impact on the existing features within the Mangrove Road area to assimilate with the</p>

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	<p>The pair of references in the papers which pose the biggest threat to the future nature and character of Hertford as a fine built environment with a strong sense of cohesion and 'community', are the references to the absence of a hard 'planning' edge; and the accepted violation of that hugely valued concept in planning terms of Hertford's Green (river valley) Fingers.</p>		<p>existing built form on either side of the area described.</p> <p>In planning for the whole district's housing needs at a strategic level for the plan period, a wider view has to be taken that balances many considerations. While unpalatable choices may be necessary in order to meet demonstrable need for the district as a whole, mitigation measures for those finally selected development areas should ensure that the character of the district's settlements is maintained. The treatment of boundary edges will be one aspect of this approach.</p>
5.3.74	<p>Agree with the statement "Pishiobury Park and the Rivers Nursery Orchard are significant green infrastructure assets but their accessibility is limited. Opportunities should be taken should development occur to create links between new neighbourhoods and existing green infrastructure assets, or to create new assets that could be supportive and supplementary to the habitats and</p>	Cllr Buckmaster*	Noted and acknowledged.

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	species that inhabit the Stort valley and the orchards.		
5.3.74	Accept and anticipate that some built development in the lands adjacent to the orchard will take place. Hoped it will be low density and wholly protective of and sensitive to, the existing green infrastructure assets that exist there. Hoped that planning offset would bring the much needed funded Management Plan, Visitor Centre and as stated in the preceding paragraph create a new asset, which for us would be a Nature Reserve.	Cllr Buckmaster*	These matters would be considered as a matter of course should development in this location be considered appropriate. At this stage, this area of search is only being considered as part of a scenario which would see approximately 3,000 dwellings within a new bypass to the west of the town.
5.3.80	“At the end of Sieve 2, it was decided that development should be limited in this location to land north of The Crest, as development west of The Crest would be likely to result in the removal of the strategic gap between Sawbridgeworth town and High Wych village. In terms of the landscape character area, the impacts of historic encroachment would be exacerbated. This coalescence would also harm the Rivers Nursery Orchard, a Local Wildlife Site and area of significant local importance” **	Cllr Buckmaster*	Agreed. For clarification, this statement refers to the site’s significance in wildlife ecology terms. Additional words to be inserted: “...a Local Wildlife Site of significant local ecological importance. Furthermore, the Orchard has significant local, national and international historical horticultural importance.” Whilst it is not common practice to commission full ecological surveys as part of the plan-making process, sufficient detail has been

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	<p>This statement needs examination and exploration in more detail and lesser impacts on the wildlife site would be very welcome. There is an increasing need for a full, independent ecological survey of the site to determine its true ecological contribution before any plans North or West of The Crest are firmed up.</p> <p>** See above. Correction: "The Rivers Nursery Orchard, a Local Wildlife Site and area of significant local importance" It is a site of national and international historical, horticultural importance. It is the holy grail of English fruit production (RHS Fruit Group 2005)</p>		<p>sought for this stage of the process. This advice received identifies the land closest to the orchard as having the most ecological value. Thus it follows that land further north of The Crest would be of less ecological importance than land to the west of the Crest immediately adjacent to the Wildlife Site.</p> <p>Further stakeholder advice will be sought as part of the consultation on the draft district plan. The role of the strategy is to identify areas of search at a level of detail proportionate to the stage of the plan. Further details and site boundaries can be determined in Part 2 of the plan which looks at site allocations.</p> <p>In the meantime, developers would be expected to submit full surveys on sites such as this alongside applications.</p>
5.3.84	Although large-scale development to the west of the town would be contained by a bypass, which	Cllr Buckmaster*	Agreed. This is already noted several times in the evaluations, but until such time as it can be

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	would act as a physical edge to development, development of this scale would be likely to have serious adverse impact on the urban form of the town. The ongoing consequences of a bypass (despite provision of wildlife corridors) would also have an extremely negative effect on migratory wildlife populations and the long term sustainability of existing species on the Rivers Nursery Site		categorically determined that this area is not needed to provide for identified needs, this option has to remain a possibility to be given due consideration.
General	What all of the above does not cover and must be understood by implication, is that if the Harlow North Plan is scrapped completely or scaled down significantly, there will be automatic pressure on this green fringe of Sawbridgeworth to meet East Herts housing requirements.	Cllr Buckmaster*	<p>This implication is considered further in the development and assessment of the potential impacts of these alternative strategy scenarios.</p> <p>Local Planning Authorities including East Herts Council are obliged by the NPPF to meet objectively assessed housing need in the area (Paragraphs 47, 159, 182). The implication is therefore, that if development is not possible in certain locations, then the housing need must be met elsewhere in the district. Although this will need to be at a selection of the shortlisted</p>

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			options, it is not possible to say at this stage which of these options may be most suitable.

*Cllr Buckmaster's comments informed by The Rivers Nursery Site & Orchard Group

#Cllr Ruffles' comments informed by Hertford Civic Society