

ESSENTIAL REFERENCE PAPER 'C'

Online Consultation Comments and East Herts Responses to Draft Parks & Open Spaces Strategy 2013-18

Online Comment Number:	Do you agree with the Draft Strategy?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
1		No		-
2	-	-	-	-
3	Yes		General note - font size and type made reading the document difficult. Other comments relate to how the policy will tie in with EHDC strategic flood risk assessment and associated water policies.	<p>The document is produced in Arial 12point font – the font size has been checked with our in-house design & print team who advise it is within Council standard. We acknowledge that a larger font could be beneficial to some readers but would note that we also strive to keep the number of pages down to avoid our documents becoming too cumbersome.</p> <p>This Strategy will be viewable on the Council’s website which provides an opportunity to increase text size for easier viewing. Customers without computer facilities can view the Strategy at the Council Offices and other public buildings.</p>

4	Yes		The Parks and Open Spaces is the ideal way to capture the parks, people and places themes to support the environmental and activity/conservation aspects of development over the next 5 years. It aligns well with the development of the next Public Health Strategy which is likely to cover the same period.	Comment noted.
5	Yes		A good document but disagree with some of the content	Comment noted but details not provided to consider further.
6	-	-	-	-
7		No	the conservation and diversity are not in the interest of nature in the way they are being applied	Not sure what this is referring to as no specific examples was provided. We employ the services of the Countryside Management Service (CMS) to guide us with regard to the setting of objectives and the implementation of our actions to conserve nature. Our incumbent contractor is also fully committed to aims in this area as they carry out maintenance operations on our behalf.
8	Yes			-
9	Yes		See Q5	Comment noted.
10	Yes			-
11	Yes			-
12	Yes			-

Online Comment Number:	Do you agree with the Objectives outlined in the Draft Strategy under the headings 5.3 - Parks for people?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
1		No		-
2	-	-	-	-
3			<p>We would request that objective 11 be redrafted to say “Retain current maintenance standard and ensure value for money subject to annual review in association with stakeholders”</p> <p>We are concerned that this approach as drafted in 5.3.15 may compromise the functionality of watercourse /water features/ SuDS infrastructure and degrade these to the point where flood risk could increase and biodiversity and water quality could deteriorate.</p>	<p>Comments notes and objective amended to state that we will "12. Retain current maintenance standards and ensure value for money". We commit to reviewing our individual management plans annually but it would not be appropriate to review a 5 year strategy every year.</p> <p>We note that 5.3.15 refers to grounds maintenance and does not refer to watercourse / water features / SuDS – however we remain committed to working with stakeholders to maintain standards.</p>
4	Yes			-

5	Yes		The older generation is mentioned but I have continually asked that outdoor gym equipment be installed for use, this equipment can be used by the elderly when taking their grandchildren to the park.	We are committed to ensuring that our parks and facilities are accessible to older people and that we install facilities to meet their needs where a demand has been realised. The new fitness equipment at Sacombe Road for instance is designed to be used by children and older people. We will consider the pros and cons of outdoor gyms further as we continue to develop our parks and hope to install more equipment that can be used and enjoyed by older people. The Council provides specialised gym equipment at its leisure centres. For health & safety reasons, training is required before using certain types of equipment to prevent injury, and this is best provided in a controlled environment.
6	-	-	-	-
7	Yes		-	-
8	Yes		-	-
9	Yes		-	-
10	Yes		But please, we are not "customers".	We understand that some people may prefer to be referred to as residents rather than customers but in the context of this service lead strategy we feel that it is appropriate to describe those benefiting from our services as customers.
11	Yes		-	-
12	Yes		-	-

Online Comment Number:	Do you agree with the Objectives outlined in the Draft Strategy under the headings 5.4 - Parks for recreation?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
1		No		-
2	-	-	-	-
3	Yes		As part of the engineers team local transport plan suggestions we would like the strategy to reflect the "modal shift" policy and further encourage walking and cycling. In 5.4.2, the reference to "QR" codes may need to be explained	Comments noted and objectives amended accordingly. An extra line has been added to explain Quick Response codes.
4	Yes		Suggest updating one of the objectives to specifically include utilising green space for exercise/health reasons so it has a direct link to the Public Health Outcomes Framework, already referenced in the document.	Comments noted and document amended accordingly.
5	Yes		Outdoor table tennis tables could be added in some parks to give the older generation some form of exercise. This has also been mentioned to the council in the past.	We are committed to providing fun equipment for young and older people in our parks and have introduced a wide range from short tennis to specific exercise related items. Sports such as table tennis are provided for in our leisure centres but we will certainly consider outdoor versions as we consult with park users to inform development plans where we have identified funds.

6	-	-	-	-
7	Yes		-	-
8	Yes		-	-
9	Yes		-	-
10	Yes		-	-
11	Yes		-	-
12	Yes		-	-

Online Comment Number:	Do you agree with the Objectives outlined in the Draft Strategy under the headings 5.5 - Parks for wildlife, conservation and heritage?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
1		No	<p>I appreciate what is trying to be achieved here but I'm afraid you have the priorities all wrong. Hertfordshire is a beautiful place to live but I'm afraid that it does not have the infrastructure to support residents. I love the idea of open spaces, recreational areas etc but at present we do not have enough schools to serve the population of east Herts. New schools need to be built and I'm afraid that means putting education above the needs of wildlife. Unfortunately these open spaces are often perfect locations for new schools and this should be our priority. We cannot focus on developing areas for wildlife and heritage when our children and our future are in such a terrible situation - where there are simply not enough primary or secondary places to serve the population - let alone the new 'baby boomers' that are coming in the next few years. Let's get the priority right here. Building new schools and securing education for our children. If</p>	<p>Whilst we understand that the programme to build new schools is important, this strategy has not considered alternative uses other than recreation and the conservation of wildlife. The provision of schools is a County Council function and no request has been made from the County to build on the District's open spaces.</p> <p>The District's corporate priorities are clear and committed to enhancing the quality of life, health and wellbeing, maintaining our parks, play areas and open spaces, and protecting the environment. There is no evidence that these are competing priorities.</p>

			that means we have to forsake some open space, so be it. If that means some wildlife will be effected, so be it. If that means there won't be quite as much beautiful walks and parks, so be it. Lets focus on the important things first.	
2	-	-	-	-
3	Yes		We would ask for chapter 5.5 to be amended to say “Parks for Wildlife, conservation, heritage and sustainable drainage.” Also suggest to split 5.5.4 to distinguish between environmental coordinator, planning matters and the engineers’ team. Further detail on the subject of water management in parks for this paragraph could be obtained from engineers team. It is recognised that suds in the form of Green Infrastructure could be an integral part of the council’s parks and amenity land.	Comments noted and document amended accordingly.
4	Yes		-	-
5	Yes		We need to enjoy rabbits, deer and other animals that share our open spaces	-
6	-	-	-	-

7	Yes		But not being adhered to. Inconsiderate pruning during budding and nesting period, continual driving at speed around parkland area, birdlife suffering greatly from huge pruning with only benefits being experienced by predatory birds such as crows and Jays to the detriment of all other birds. Removal of undergrowth and brush has removed habitat throughout the Thorley wedge and has created a lot of local animosity. Its just men in vans driving around cutting everything or indeed a tractor with a flail mower stripping undergrowth or hedge out.	Comments noted.
8	Yes		-	-
9	Yes		-	-
10	Yes		-	-
11	Yes		I should like to put the case on behalf of the Friends of Pishiobury for the Park becoming a Local Nature Reserve in order to give recognition of its wildlife status especially the large area of unimproved grassland now very rare in Herts.	Comments noted.
12	Yes		-	-

Online Comment Number:	Are there any broad issues with our parks and open spaces that you think we have not covered in our Draft Strategy?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
1	Yes		Better use of these open spaces for building new schools.	Whilst we understand that the programme to build new schools is important, this strategy has not considered alternative uses other than recreation and the conservation of wildlife. The provision of schools is a County Council function and no request has been made from the County to build on the District's open spaces. The District's corporate priorities are clear and committed to enhancing the quality of life, health and wellbeing, maintaining our parks, play areas and open spaces, and protecting the environment. There is no evidence that these are competing priorities.

2	Yes	<p>Thank you for your consultation with regard to the Draft Parks and Open Spaces document. British Waterways has transferred to the charitable sector on 2nd July 2012 and is now known as the Canal & River Trust. The Trust is the new charity set up to care for England and Wales' wonderful legacy of 200-year-old waterways, holding them in trust for the nation forever. The Trust has responsibility for 2,000 miles of canals, rivers, docks and reservoirs, along with museums, archives and the country's third largest collection of protected historic buildings. The Trust has a range of charitable objectives including: To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; To protect and conserve objects and buildings of heritage interest; To further the conservation, protection and improvement of the natural environment of inland waterways; and To promote sustainable development in the vicinity of any inland waterways for the benefit of the public. The main sources of the Trust's funding are from</p>	Comments noted and document amended accordingly.
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<p>2 (continued)</p>		<p>a 15-year contract with government and income from boating, property and utilities. This funding is important for keeping our precious 200-year old waterways running, but it is not enough to fully support our canals and rivers as valuable resources for people and nature, particularly when under increased pressure and intensified use from expanding development. Our canals and rivers are today used by more people and for a wider variety of purposes than ever before, with over 35,000 boats and 13 million towpath visitors using them as an escape from the pressures of modern life. Once Britain's most important transport system, our waterways are now a focus for economic renewal in the towns and cities they helped to create. The Trust works extensively with private, public and voluntary partners to conserve, enhance and improve the waterways of England and Wales. Our expertise and responsibility for water space, combined with their ownership of docks, canals and waterside properties, puts us in a unique position to facilitate redevelopment for both</p>	
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<p>2 (continued)</p>			<p>economic and environmental gain. The canals in particular have historically experienced a prolonged period of decline. In recent years, the canals and river navigations such as the Rivers Lee and Stort have experienced significant development pressures from commercial, residential and tourism/recreation developments. Attractive waterside environments have stimulated this interest and been at the heart of some of the most significant regeneration schemes. The Rivers and towpaths still remain well loved and well used recreational spaces and we are surprised that their worth is not recognised within the strategy.</p>	
<p>3</p>	<p>Yes</p>		<p>Sustainable drainage and the general philosophy behind strategic water management within the parks and open spaces could be expanded upon - further details from engineers' team.</p>	<p>This has been discussed with the Engineers Team and the document amended accordingly.</p>
<p>4</p>		<p>No</p>		<p>-</p>

5	Yes		Farm Close open space is not mentioned, this is a large area on Sele Farm Estate	Farm Close is one of approximately 120 open spaces that we manage across the district. This space will be considered in more depth through our parks planning programme in the future and is already maintained to the high standards aspired to in the strategy.
6	Yes		In areas such as The Meads there are football pitches, but, no other facilities such as changing rooms, storage areas for nets etc. A decision needs to be made about making the facilities better for everyone by investing in some infrastructure, therefore an ability to increase charges, or, other facilities could be improved, such as the Hertford Town Football Club, which already has facilities, but could also benefit from some improvements. There is open space around the stadium which could be used for training/matches. Overall improving youth football in Hertford. Some clubs already share facilities with schools for the use of playing fields.	The Council meets annually with the football clubs which hire pitches and has responded this year to some changes in pitch layout and type, focussing by request more on youth football. Hartham Common is served by some high quality changing rooms at the leisure centre. The Council is committed to working with partners to utilise any funds that might become available in the future to add new facilities.

7	Yes	lighting, public perception, no control of motorised vehicles being used in open space, extensive vehicle traffic on a daily basis over area that are often repaired by the council only to be damaged again, damage to private property, lack of awareness of the Thorley land ownership issues, poor communication with residents through lack of consultation, little/no control over contractors on site, actively allowing pollution adjacent to a watercourse on Thorley wedge by Thames water after removal of contaminated material (non standard procedure) loss of grassland habitat.	There has been some ongoing dialogue with a local resident who has concerns about contract maintenance at Thorley Wedge. Whilst we appreciate that in the past, our contractor had used vehicles on site in wet weather inappropriately; there has been no evidence of any lack of control. These comments reflect some genuine concerns but we cannot agree that any of these allegations are correct.
8	Yes	It would be great to have a section for smaller projects and community garden areas.	Some of our smaller projects are certainly dealt with in our individual parks management plans and many are promoted through Link. This document however is designed to consider the wider elements of our plan for the future and not the specific actions. We would be interested in talking to any residents that had identified any suitable Council land that they might want to manage as a community garden. Residents at Sele Farm for instance have planted fruit trees in some areas of the open space in Farm Close.

9	Yes		Appendix 4 lists Allotments & Cemeteries but there is no mention of these within the strategy. With the increased development of the District, allotments and cemeteries will be required and land should be made available for both by prospective developers. With the increase in infill development, open space is reducing, buffer zones should be allowed for between existing and new development.	The Council does manage three closed churchyards but not cemeteries which are in use. These are managed and respected as open spaces. Three of the districts allotments are run by East Herts Council. The majority though are managed by the Town Councils. Our Development Management Department is responsible for guiding developers in relation to land use. We support their commitment to ensuring that open spaces continue to be a defining feature of a good housing development.
10			It is nothing but broad issues. Not sure how much use this is to residents like me. It's like God and apple pie, so general there is nothing to disagree with and gives no picture of what will actually happen.	The nature of the document is that it deals with broad issues. Residents are encouraged through Link to look at our more detailed management plans for individual parks as we publish and review them.
11	Yes		I think it is important not to over-manicure sites especially those with a strong wildlife and countryside perspective. The same management regime is not applicable to 'town park' types as to 'country parks'. It is important to maintain a 'wild' aspect where this is applicable.	Our general ethos in managing our parks certainly supports this sentiment as does the strategy. The diversity of our management plans reflects this in practice where it can clearly be seen that "one size does not fit all"
12		No	-	-

Additional Consultation Comments and East Herts Responses to Draft Parks & Open Spaces Strategy 2013-18

Consultee:	Do you agree with the Draft Strategy?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
Environment Agency	Yes		-	-
EHC Planning Policy	Yes		Overall, the Planning Policy Team supports the draft strategy although there are areas in which more could be done to secure joint working between Environment, Leisure and Planning Policy Teams. More detail is provided under each section question below.	We are committed to working together with all departments and have delivered a number of cross departmental projects. It is not always possible however to combine our objectives. We have considered these detailed comments and modified the text where appropriate.
Sport England	Yes		-	-
Canal & River Trust	-	-	-	-
HCC Historic Environment Unit	-	-	-	-
EHC Environmental Health Promotion	Yes		-	-

<p style="text-align: center;">EHC Engineers</p>	<p style="text-align: center;">Yes</p>		<p>General note - font size and type made reading the document difficult. Other comments relating to how the policy will tie in with EHDC strategic flood risk assessment and associated water policies.</p>	<p>The document is produced in Arial 12point font – the font size has been checked with our in-house design & print team who advise it is within Council standard. We acknowledge that a larger font could be beneficial to some readers but would note that we also strive to keep the number of pages down to avoid our documents becoming too cumbersome. This Strategy will be viewable on the Council’s website which provides an opportunity to increase text size for easier viewing. Customers without computer facilities can view the Strategy at the Council Offices and other public buildings.</p>
<p style="text-align: center;">EHC Community Safety</p>	<p style="text-align: center;">Yes</p>		<p style="text-align: center;">-</p>	<p style="text-align: center;">-</p>

Consultee:	Do you agree with the Objectives outlined in the Draft Strategy under the headings 5.3 - Parks for people?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
Environment Agency	-		N/A	-
EHC Planning Policy	-		With regards to developing a 'Friends Of' group, the ambition is for only one additional group. Could the ambition not be to 'develop a 'Friends Of' group for all major parks and support the development of 'Friends Of' groups for other parks where demand exists.	The resources necessary to support a friends group are considerable and we believe that committing to one more main group is sustainable. We would however still welcome any approach from residents to work with us on any open space or park and would do our best to accommodate their needs.
			The section refers to the Parks and Open Spaces Development Programme. If this programme were publicly available or at the very least shared with other departments that could contribute to its success, this would be a considerable benefit. We are trying to embed this approach into the policies in the emerging District Plan. It would be useful if more links were made to the emerging District Plan in paragraph 5.3.8: "We will continue to work with the Planning and Leisure Services to secure	The P&OS development programme deals with specific and actionable objectives which are largely featured in our Departmental Service Plans. These in turn form part of the Council's corporate procedure to ensure the Council is "working together". We are always receptive to consultation by other departments and happy to share details of our projects.

EHC Planning Policy (continued)			ownership of and contributions towards the Parks and Open Spaces Development Programme to ensure integration with other relevant plans and programmes."	
			Para. 5.3.11 typo - Green Flag on second line.	Document amended.
			Para. 5.3.17 What is meant by the local landscape of the Health and Wellbeing Board and its Strategic Objectives?	Environmental Health Promotion Officer has provided additional wording to amend document.
Sport England	-	-	-	-
Canal & River Trust	-	-	-	-
HCC Historic Environment Unit	-	-	-	-
EHC Environmental Health Promotion	Yes		Add in information about the '5ways to Wellbeing'	Environmental Health Promotion Officer has provided additional wording & document amended.
EHC Engineers	-	-	We would request that objective 11 be redrafted to say "Retain current maintenance standard and ensure value for money subject to annual review in association with stakeholders"	Comments noted and objective amended to state that we will "12. <i>Retain current maintenance standards and ensure value for money</i> ".

EHC Engineers (continued)			We commit to reviewing our individual management plans annually but it would not be appropriate to review a 5 year strategy every year.
		We are concerned that this approach as drafted in 5.3.15 may compromise the functionality of watercourse /water features/ SuDS infrastructure and degrade these to the point where flood risk could increase and biodiversity and water quality could deteriorate.	We note that 5.3.15 refers to grounds maintenance and does not refer to watercourse / water features / SuDS – however we remain committed to working with stakeholders to maintain standards.
EHC Community Safety	-	5.3.1 Work with partners to provide diversionary facilities and activities to help reduce ASB and maintain low crime levels	Document amended.
		5.3.5 Think the inclusion of this is useful for ASB complaints – thank you!	Comment noted.
		5.3.6 Perhaps also include something about the tensions between residents and youths / teens who use the parks and open spaces; in terms of residents perceiving ASB is taking place as youths are congregating there.	Document amended to reflect these observations.
		5.3.6 Could the first sentence be changed to ‘partners from the East Herts Community Safety Partnership’ rather than just police?	Document amended.

Consultee:	Do you agree with the Objectives outlined in the Draft Strategy under the headings 5.4 - Parks for recreation?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
Environment Agency	-		N/A	-
EHC Planning Policy	-		Ambition 4 could be linked with the EH Green Infrastructure Plan.	Comment noted. The Green Infrastructure Plan is referred to in relation to the Strategy in general.
			Ambition 6 - If there is a list of areas identified as being deficient in facilities this should be shared or made into an action plan which would then be referred to in the emerging policies and in negotiations with developers.	Each parks management plan seeks to deliver this function. The park's constraints and problems are identified and these documents are referred to in relation for example to potential section 106 funding.
			Ambition 7 and 8 - Again, there could be a reference to the need to link these ambitions to the emerging District Plan policies.	Environmental Services work closely with Development Management and provides advice as is required to develop the emerging District Plan.
			Ambition 9 - Can this be linked to the emerging development strategy where significant urban extensions are a distinct probability? How will adequate land and water resources be measured? Will they be measured against a standard of provision? If so, what standards? Are these embedded in a policy and are they used when	These are issues which we are keen to support but which are not central to the focussed purpose of this P&OS Strategy to manage and improve existing parks and open spaces.

EHC Planning Policy (continued)		responding to planning applications?	
		Para. 5.4.2 typo in activities	Document amended.
		Para. 5.4.3 - When was the initial audit? If this is the 2005 PPG17 study then this may be well out of date. If it is a new one then this audit be shared with those who could use it when negotiating with developers or when preparing new policies for example. Are the maps mentioned in this paragraph publicly available? These could be useful when translating the EH Green Infrastructure Plan into 'on the ground' actions.	Comment noted.
		Para. 5.4.8 - Suggest adding an additional line to state that "We will continue to work with Planning and Leisure Services on the forthcoming update to the Parks and Open Spaces Audit and Assessment."	Document amended.

<p>Sport England</p>		<p>While acknowledging that the draft strategy recognises the role that parks play in meeting the community's formal sports needs, I am potentially concerned about the extent to which the delivery of this strategy will be co-ordinated with the delivery of the Council's Playing Pitch Strategy and Outdoor Sports Audit (2010). The playing pitch strategy incorporates a detailed assessment of the formal outdoor sports use of the Council's parks and includes an action plan for each sport which has direct implications for parks which provide outdoor sports facilities. While reference is made in the draft parks strategy (paragraph 5.4.8) to the playing pitch strategy it is unclear whether the actions in the playing pitch strategy have been accounted for when the draft strategy was prepared and whether the delivery of the two strategies will be fully co-ordinated in practice.</p>	<p>Document amended.</p>
<p>Sport England (continued)</p>	<p>-</p>	<p>More reference would be expected in the key recreation related proposals in paragraph 5.4.1 to how the delivery of the parks strategy will assist with the delivery of the playing pitch strategy and examples of this should be referred to in</p>	<p>Document amended.</p>

			the strategy e.g. proposals for enhancing pitches, courts, pavilions etc. To address this concern, it is requested that the Council review the relationship between the two strategies and consider how the parks strategy can be consistent with and assist in the delivery of the playing pitch strategy.	
Canal & River Trust	-		-	-
HCC Historic Environment Unit	-		-	-
EHC Environmental Health Promotion	Yes		-	-
EHC Engineers			As part of the engineers team local transport plan suggestions we would like the strategy to reflect the "modal shift" policy and further encourage walking and cycling	Comments noted and objectives amended accordingly.
			In 5.4.2, the reference to "QR" codes may need to be explained	Document amended - an extra line has been added to explain Quick Response (QR) codes.
EHC Community Safety	-		-	-

Consultee:	Do you agree with the Objectives outlined in the Draft Strategy under the headings 5.5 - Parks for wildlife, conservation and heritage?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
Environment Agency	Yes		Generally we agree with the section on wildlife, conservation and heritage. However, you should expand section 5.5.4 to take account of the number of watercourses within your district.	Comment noted.
			There should be an emphasis on meeting the aims of the Water Framework Directive. At present only one of your thirteen surface water bodies are achieving good ecological status/potential. This demonstrates that addressing the reasons for failure should be a key priority .	Comment noted and document amended to reflect this - see revised aim 4 in section 5.5.2 " <i>Seek opportunities for river restoration and enhancement in our parks and open spaces by working with partners and interested bodies, subject to availability of resources.</i> " The Council recognises the unique nature of the rivers in our parks and will work to improve their ecological status / potential.
			Opportunities for river restoration or river enhancement should be sought at all times and this should be listed as one of you aims. This also links in with your other two objectives.	Comment noted and document amended to reflect this - see revised aim 4 in section 5.5.2 " <i>Seek opportunities for river restoration and enhancement in our parks and open spaces by working with partners and interested bodies, subject to availability of resources.</i> "

EHC Planning Policy		Ambition 2 should say "to enhance biodiversity in our parks..." rather than ensure. The aim of the Hertfordshire Biodiversity Action Plan and the NPPF is to secure overall net gains in biodiversity.	Document amended.
		Ambition 3 - remove "consider and"	Document amended.
		Ambition 4 - Not entirely sure what this means. The supporting text should explain this further and identify how such influence can be made i.e. through regular partnership meetings perhaps. The obvious option here is to refer to the emerging District Plan. Policies could be devised to ensure new developments enhance biodiversity through suitable design either on-site or through working with the appropriate body to improve alternative sites, for example.	Comment noted.
EHC Planning Policy (continued)	-	Para. 5.5.4 - Needs an apostrophe in "district's water courses". It would also be useful to refer to the Green Infrastructure Plan, the Lea Valley Nature Improvement Area activity (they are bidding for funds to carry out more work on Waterford Heath and the Lee/Lea tributaries that run through the	

EHC Planning Policy (continued)			district), River Catchment Management Plans. We are currently preparing policies which address the need for sustainable use of water and appropriate solutions to waste water etc in our emerging plans.	Document amended.
			Para 5.5.5 - Again, this could refer to other relevant plans and programmes that could be tied into this work. We need a joint approach between Environment, Leisure and Planning to ensure a holistic approach to all our areas of work.	Comment noted.
Sport England	-		-	-
Canal & River Trust	-		-	-
HCC Historic Environment Unit	-		-	-
EHC Environmental Health Promotion	Yes		-	-
EHC Engineers			We would ask for chapter 5.5 to be amended to say “Parks for Wildlife, conservation, heritage and sustainable drainage.”	Comments noted.

			Also suggest splitting 5.5.4 to distinguish between environmental coordinator, planning matters & the engineers' team.	Comments noted and document amended accordingly.
			Further detail on the subject of water management in parks for this paragraph could be obtained from engineers team. It is recognised that suds in the form of Green Infrastructure could be an integral part of the councils parks & amenity land.	Comments noted.
EHC Community Safety	-		-	-

Consultee:	Are there any broad issues with our parks and open spaces that you think we have not covered in our Draft Strategy?			East Herts Response to Consultation Comments:
	Yes	No	Comments	
Environment Agency		No		-
EHC Planning Policy		No	General Comments	See below:
			Not entirely sure whether paragraph 1.6 is needed.	Commented noted.
			Para. 2.6 - Perhaps this could read "The Parks and Open Spaces Strategy will sit alongside existing Planning documents and the emerging District Plan. Appendix 1 and 2 contain information on relevant national and local policies respectively."	Document amended.
			An overview of existing provision - Reference to the NPPF does not sit comfortably in this section, which should be setting the scene of existing provision. It should be moved to Appendix 1 or through an emended paragraph 2.6. If quoting a document these should be in italics and indented with a reference at the end such as (Para. 73, NPPF, 2012).	Document amended.

EHC Planning Policy (continued)		Para. 5.1.5 - Refers to PPS12 but should be the NPPF.	Document amended.
		Para. 5.1.6 - could include a reference to Planning Policy as well as the Landscape Officer.	Document amended.
		Appendix 1 - insert reference to the NPPF before PPG17 reference. The NPPF is the national planning guidance which sets the approach to development across the country and takes precedence where local or district plans are silent or indeterminant on particular issues. Remove reference to the Regional Spatial Strategy, and make it clear that PPG17 has been superseded, although for the purposes of benchmarking etc, the typology from PPG17 will remain in use.	Document amended.
		Is it worth referring to Sport England in here as the national body for encouraging sport and recreation. Similar to Natural England for their work on nature conservation and the Environment Agency for their work on watercourses?	Commented noted.
		Appendix 2 - Suggest the District Plan section should be replaced by:	

EHC Planning Policy (continued)			<p>“The District Plan is the emerging planning document that will shape the future of East Herts to 2031. It will replace the Local Plan Second Review (April 2007). The District Plan will set out the approach to development across the District and is concerned with creating sustainable communities, planning not only for the provision of new homes, but also new employment opportunities, schools, retail opportunities, nature conservation and green infrastructure as well as supporting community infrastructure such as parks and open spaces. The District Plan is distinct from Neighbourhood Planning which enables local communities to prepare plans which set out their own approach to delivering the requirements of the District Plan. Further information on the emerging District Plan is available on the Council's Website at www.eastherts.gov.uk/districtplan</p>	Document amended as per suggested wording.
			Appendix 3 - Does the title need to have PPG1 in it?	Document amended.
Sport England	-	-	-	-

<p>Canal & River Trust</p>	<p>-</p>	<p>-</p> <p>. In recent years, the canals and river navigations such as the Rivers Lee and Stort have experienced significant development pressures from commercial, residential and tourism/recreation developments. Attractive waterside environments have stimulated this interest and been at the heart of some of the most significant regeneration schemes. The Rivers and towpaths still remain well loved and well used recreational spaces and we are surprised that their worth is not recognised within the strategy.</p>	<p>Comment noted and document amended.</p>
<p>HCC Historic Environment Unit</p>	<p>-</p>	<p>-</p> <p>This Office maintains the County Historic Environment Record, which contains information on designated and undesignated archaeological and historic assets throughout Hertfordshire. We would welcome consultation of the Record either directly, or via the Countryside Management Service, so that we can provide any relevant information relating to the development of responsible management plans for the Council's open spaces, or their maintenance.</p>	<p>Comment noted.</p>

EHC Environmental Health Promotion	-	-	-	-
EHC Engineers		-	Sustainable drainage and the general philosophy behind strategic water management within the parks and open spaces could be expanded upon - further details form engineers team.	This has been discussed with the Engineers Team and the document amended accordingly.
EHC Community Safety			Appendix 2 - Community Safety Plan - amend wording due to changes in legislation - as per suggested wording.	Document amended as per suggested wording.
			Appendix 2 - Community Safety Action Plan - amend wording as suggested	Document amended as per suggested wording.
			Appendix 3 - Change JAG to East Herts Community safety Partnership	Document amended as suggested.
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