

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
<b>Introduction</b>				
18.0	18	Provision must be carefully considered to ensure all age groups are catered for. Many services are being cut in the name of austerity. Skills and recreational training must be included.	Noted.	<b>No amendment in response to this issue</b>
18.1	18.1	Where is the chapter on Education?	Whilst there is no specific chapter, policies on education can be found under Section 18.10 (renumbered 18.11) and 14.6 Lifelong Learning.	<b>No amendment in response to this issue</b>
18.2	18.1.2	Paragraph supported.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
18.3	18.1.3	What provision are EHDC envisaging for the increased number of young people in the area? Only one swimming pool and the number of football pitches is not enough for the present population.	It is acknowledged that new housing can place additional pressure on existing open space and facilities. New housing will therefore be expected to provide for new open space and facilities in accordance with Policy CFLR2. Proposals for new open space, indoor and outdoor sport and recreation facilities which meet identified needs will also be encouraged in suitable locations in accordance with Policy CFLR1.	<b>No amendment in response to this issue</b>
18.4	18.1.4	HERT4 – Bengeo does not have any medical services, residents have to travel into town to visit the doctors or dentists. The extra 150 properties proposed by EHDC will place undue strain on the existing medical facilities. Extra capacity needs to be provided as and not after each phase is occupied. The larger sites to the west of Hertford would offer the chance to build these from scratch.	Noted – This comment will be considered further under Chapter 7: Hertford.  Draft Policy CFLR7 could go further by encouraging the provision of community facilities in line with the demands of development. Policy CFLR7 (renumbered CFLR8) to be split into two with one policy that focuses on where new facilities are required and provided, and a second policy	<b>Amendment to Policy CFLR7 (renumbered CFLR8)</b>  See proposed chapter

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			which focuses on the loss of community facilities, in a similar way to the proposed changes to the open space policies.	
<b>Open Space, Sport and Recreation</b>				
18.5	18.2.4	Sport England support reference to technical studies underpinning CFLR1. Whilst studies are considered robust, the supply and demand data on which they are based is now 4-5 years old and there is a need to consider updating these. It will be important that a review of the studies is completed before the plan reaches an advanced stage.	Noted. The Council will continue to work with partners to ensure information is up-to-date and relevant throughout the plan period.	<b>No amendment in response to this issue</b>
18.6	18.2.5	Sport England welcome the proposed use of community use agreements to secure access to new facilities on educational/private sites. Approach accords with the NPPF which encourages the provision and use of shared space to enhance the sustainability of communities.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
18.7	18.2.5	Local residents see the community use agreements as an opportunity for greater community use of the facilities at St Andrews School, Stanstead Abbots.	When appropriate opportunities arise, the Council will support and work with communities to make better use of facilities through Community Use Agreements.	<b>No amendment in response to this issue</b>
18.8	CFLR1 18.6	Natural England generally approves of the policies related to Open Space and is encouraged to see the protection and enhancement of the Amwell and Rye Meads SSI. The intention to maintain and create networks between Wormley/Hoddesdon Park Woods, Kings Mead and the Stort Valley is also welcomed.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
18.9	CFLR1	Sport England support this as it is considered to provide a positive response to the evidence base for sport in relation to the protection, enhancement and provision of sports facilities. Policy fully accords with	Support noted and welcomed.	<b>No amendment in response to this issue</b>

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		the NPPF especially paragraphs 70, 73 and 74.		
18.10	CFLR1	Walking in the area is an important recreational activity. There should be a statement that says: 'a strategic objective is to maintain the quality of the footpaths in the area, and the rural views that so many of them offer. Developments that will damage the views from footpaths will only occur where exceptional need can be shown, and where no other alternative exists.'	Whilst Policy TRA1 seeks to protect rights of way, it is considered appropriate to add a new section on public rights of way.	<b>New Section 18.5 on Public Rights of Way</b> See proposed chapter
18.11	CFLR1	Objection to the 'open space' designation on the land west of County Hall and should be removed from the proposals map. The playing pitches are unallocated in the adopted Local Plan. Land is used primarily by County Staff. Identification under Policy CFLR1 removes any possibility of potential residential uses on this site, for example on the part adjacent to Leahoe. Facilities for recreation acceptable within Green Belt policy could be provided on a site to the west of the town, north or south of Welwyn Road.	Not agreed. The land in question is allocated under Policy LRC1 in the Local Plan 2007. It is a well-used for cricket, football etc. by the County Council and other local clubs.	<b>No amendment in response to this issue</b>
18.12	CFLR1	There are not adequate sports facilities allocated in the Local Plan to accommodate for the level of growth.	It is acknowledged that new housing can place additional pressure on existing open space and facilities. New housing will therefore be expected to provide for new open space and facilities in accordance with Policy CFLR2. Proposals for new open space, indoor and outdoor sport and recreation facilities which meet identified needs will also be encouraged in suitable locations in accordance with Policy CFLR1.	<b>No amendment in response to this issue</b>

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18.13	CFLR1	<p>Bishop's Stortford College object to land in their ownership being identified under Policy CFLR1. Paragraphs 18.1.3 and 18.2.2. clearly highlight that the open space to which this policy should apply should comprise sports facilities or public recreation areas, not private garden/lawned areas. There is no public access through the College in this location. The CFLR designation should be removed.</p>	Agreed.	<b>Amendment to Policies Map</b>
8.14	CFLR1 I (b)	<p>HCC object to CRLR1 I(b)</p> <p>Often when additional development is provided on a school site, the only area available is on an existing hard play area or playing field. When this occurs HCC provide mitigation for this loss. This mitigation may take a number of forms and can include, for example, the provision of a Multi-Use Games Area (MUGA); improvements to remaining sport pitches; or the use of a detached playing field.</p> <p>HCC work with Sport England to ensure that they raise no objections to any proposals for school expansions. Indeed, community use agreements have been required by Sport England, which has resulted in new and existing facilities on school sites becoming accessible to the local community outside of school hours.</p> <p>It is rarely possible to provide enhanced provision in terms of quantity but as stated above HCC seek to provide enhanced quality of facilities and access to those facilities for the local community. CFLR1 I(b) should be amended to read 'quantity and/or quality' rather than referring to both.</p>	Agreed.	<p><b>Amendment to Policy CFLR1</b></p> <p>I(b) The loss resulting from the proposed development would be replaced by enhanced provision in terms of quantity and/or quality in a suitable location prior to the commencement of development; or</p>

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18.15	CFLR1	French & Jupps object to land in their ownership being identified under Policy CFLR1. Site originally identified in the 2007 Plan having been identified by the Parish Council as being 'ideal for outdoor activities associated with the adjacent hall'. At the time owners objected to the designation and continue to do so. The site is in private ownership, with no public access and is fenced. The site is not available for community leisure use.	If the land is identified as being in public use then it should be retained as CFLR designation. This site will be assessed as part of the SLAA process where this status will be confirmed.	<b>Possible amendment to the Policies Map</b>
18.16	CFLR1 I (b)	HCC further objects to the requirement that enhanced provision is provided <i>prior to the commencement of development</i> . With the expansion of a school this is not usually practical or possible. It should also be noted that some works required to playing fields, such as reseeding, can only take place at certain times of the year. As a result these improvements may take place several months after the completion of the built development on a school site.	Noted. However, as a general principle the Council would wish to see a continuation of provision. If there are particular circumstances that prevent this, these will be considered on a case by case basis.	<b>No amendment in response to this issue</b>
18.17	CFLR1 III	HCC support CFLR1 (III). However there is a concern that there is often a net degrading impact to biodiversity, often as a result of inappropriate management, disturbance and floodlighting. Whilst enabling increased use of facilities, this cannot have anything other than an imposing effect locally increasing the extent of artificial light, however well designed. Greater recognition of landscaping schemes to compensate for this and obscure any such negative impacts should be taken more seriously by LPAs than at present if this aim is to be met.	Noted.	<b>No amendment in response to this issue</b>

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<b>Open Space Standards</b>				
18.18	CFLR2	Sport England generally supports this policy although raise concerns about the use of the standards set out in Appendix C in relation to outdoor and indoor sport. The standards referenced are considered to be out of date.	Comments noted. The Council is currently considering undertaking a review of standards. However, until such time as this has been completed the standards in Appendix C will be updated to reflect the Council's Sports Facility Assessment (2011) and the Playing Pitch Strategy (2010).	<b>Amendment to Appendix C</b>
18.19	CFLR2	Objection to the on-site open space requirements. Standards are considered too onerous and if adopted could frustrate future housing development in the district.	Comments noted. The Council is currently considering undertaking a review of standards. However, until such time as this has been completed the standards in Appendix C will be updated to reflect the Council's Sports Facility Assessment (2011) and the Playing Pitch Strategy (2010). This is in line with Sport England advice.	<b>Amendment to Appendix C</b>
<b>Local Green Space</b>				
18.20	CFLR3	Bishop's Stortford College object to land in their ownership being identified as 'Local Green Space'. The draft plan considers that this part of the land falls within a 'green finger'. Para 77 of the NPPF provides detailed guidance concerning the designation of new Local Green Space. The land in question is already Green Belt and there is no justification for additional protection. CFLR3 is not consistent with Green Belt policy.	Policy CFLR3 is considered to be in conformity with NPPF paragraph 77 on Local Green Space and Section 9 of the NPPF on Green Belt. The green wedges in Bishop's Stortford are of significant local importance in amenity wildlife and leisure value terms. It is considered appropriate given their local importance that the green wedges receive additional protection from inappropriate development.	<b>No amendment in response to this issue</b>

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18.21	CFLR3	The Sacombe Road playing field should be designated in the Plan as a Local Green Space as it appears to meet the conditions but is not yet protected. Its possible use for housing is a matter of considerable local concern and speculation. It is the only safe green space for a considerable area of Bengo and is very heavily used throughout the day.	<p>The play area is already protected under Policy CFLR1 (Open Space, Sport and Recreation).</p> <p>The Council is not proposing to identify any further areas of Local Green Space in the District Plan. Local communities, however, through Neighbourhood Plans, can identify areas of particular importance to them for Local Green Space protection.</p>	<b>No amendment in response to this issue</b>
18.22	CFLR3	Bishop's Stortford North Consortium object to the Local Green Space designation on land within the Green Belt as there is no additional policy benefit. It is proposed that CFLR3 should be amended to include the same matters as in GBR1 and CFLR2 which allows for the erection of buildings and appropriate facilities associated with outdoor sports and recreation uses. The Local Green Space designation is seen to threaten the ability of the BSN Consortium to support the Local Sports Strategy to fund improvements to the sporting facilities within the town, including at Cricketfield Lane. There is a concern that there is some uncertainty around the ability to improve facilities without knowing whether 'very special circumstances' as these improvements may involve some form of development.	Policy CFLR3 is considered to be in conformity with NPPF paragraph 77 on Local Green Space and Section 9 of the NPPF on Green Belt. The green wedges in Bishop's Stortford are of significant local importance in amenity wildlife and leisure value terms. It is considered appropriate given their local importance that the green wedges receive additional protection from inappropriate development. This does not prejudice the ability to make improvements to existing facilities provided there is no impact on the purposes of the Green Belt.	<b>No amendment in response to this issue</b>
<b>Water Based Recreation</b>				
18.23	18.5.1	The Canal & River Trust support and encourage the use of waterspace and towpath for both informal and formal recreational use. However most of the recreational usage does not require the benefit of planning permission, rather it is the associated facilities, such as canoe stores and boathouses,	Comments noted. New paragraph added.	<p><b>New paragraph 18.6.2</b></p> <p><u>Any proposals for development needed to support water based recreation which might increase the recreational use of a stretch of</u></p>

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		<p>which are controlled by the need for planning permission. This section and policy does not make this clear.</p> <p>It is assumed that land based support facilities will be governed by other relevant plan policies, for example the same principles of good design will be expected for a boatclub clubhouse as for other buildings.</p> <p>The Trust therefore suggest that the council should consider the development needed to support waterbased recreation here, or at least make it clear that other policies will be applicable when such development is required.</p> <p>Any proposals for such development, which might increase the recreational use of a stretch of waterway should be considered in conjunction with the Canal &amp; River Trust as Navigation Authority to ensure there is no detrimental impact on other recreational users of the waterway or towpath.</p>		<p><u>waterway should be considered in conjunction with the Canal &amp; River Trust as Navigation Authority to ensure there is no detrimental impact on other recreational users of the waterway or towpath.</u></p>
18.24	CFLR4	HCC support the aim to support proposals for water-based recreation, as long as a proposal does not have a significant impact on biodiversity or character of the environment, or conflict with the River Catchment Management Plans.	Support and comments noted and welcomed.	<b>No amendment in response to this issue</b>
18.25	CFLR4	The Environment Agency supports this policy.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
18.26	CFLR4	The Lee Valley Regional Park Authority supports this policy which seeks to protect the water environment and its ecological value as it will assist in protecting the Park's environment and wildlife resource.	Support noted and welcomed.	<b>No amendment in response to this issue</b>

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<b>The Lee Valley Regional Park</b>				
18.27	18.6.1	The Environment Agency supports this paragraph.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
18.28	18.6.1	The Lee Valley Regional Park Authority supports this paragraph which highlights the green infrastructure role of the Park and its role in mitigating the impacts of climate change, including managing increasing flood risk.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
18.29	18.6.4	The Lee Valley Regional Park Authority supports the reference in this paragraph to establishing new and enhancing existing connections with other green infrastructure in the District. This addresses matters raised at the Issues and Options stage.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
18.30	18.6.4	HCC welcomes the protection and enhancement of Green Infrastructure network between Lee Valley National Park, Wormley and Hoddesdonpark Woods and Kings Mead. This will need to be managed to ensure increased disturbance does not result in degrading these links.	Support and comments noted and welcomed.	<b>No amendment in response to this issue</b>
18.31	18.6.6	Note: correct title is Canal & River Trust.	Agreed.	<b>Amendment to paragraph 18.6.6 (renumbered 18.7.6)</b> <ul style="list-style-type: none"> <li>Options, to be explored with the Herts &amp; Middlesex Wildlife Trust and the Canals &amp; Rivers Trust.</li> </ul>
18.32	18.6.7	Parish Councils such as Stanstead Abbots should be included as a stakeholder.	Noted.	<b>No amendment in response to this issue</b>

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18.33	18.6.8	The Lee Valley Regional Park Authority endorses the summary of PDF Proposals included in paragraph 18.6.8. This summary may require alterations before submission as the Authority is intending to produce a draft of these proposals for consultation.	Support noted and welcomed. The Council will continue to work with relevant partners to ensure information is up-to-date.	<b>No amendment in response to this issue</b>
18.34	CFLR5	The Lee Valley Regional Park Authority supports and welcomes this policy. This ensures the District Plan provides policy support for the delivery of the Park Development Proposals and protection for the Park and its role as part of the District's green infrastructure.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
<b>Equine Development</b>				
18.35	18.7.1 & 18.7.2	18.7.1 and 18.7.2 recognise the positive and negative contributions equine related activities can play within the countryside. Horse grazing can be beneficial for biodiversity as a grazing tool but can, due to lack of rotation or removal of animals, result in overgrazed and weedy pastures. As such Policy CFLR6 could include (c) '...proposals on local landscape or biodiversity interests'.	Agreed.	<b>Amendment to Policy CFLR6 (renumbered CFLR7)</b>  (c) The siting, scale and design of the proposal is in keeping with the character of the area, with adequate pasture to support horses. Particular regard will be had to the cumulative effect of proposals <u>on local landscape or biodiversity interests.</u>
18.36	CFLR6	Herts and Middlesex Wildlife Trust has suggested that an additional criterion should be added requiring that development does not result in harm to the local ecological network, including partial or complete loss or degradation of Local Wildlife Sites or priority habitats.  The Trust would also recommend a criterion requiring proposals to comply with other policies in the Plan	Agreed.	<b>Amendment to Policy CFLR6 (renumbered CFLR7)</b>  <u>(f) The proposal does not result in harm to the ecological network, including partial or complete loss or degradation of Local Wildlife Sites or priority habitats;</u>  <u>(g) The proposal does not conflict</u>

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				<u>with other policies within this Plan.</u>
18.37	CFLR6 I (a)	The term 'prominent location' is not considered suitable wording. Proposed wording amendment for CLFR6 (a): 'The development is sited in an area where it will not be detrimental to the appearance of the surrounding countryside.'	Agreed that the meaning of 'prominent location' is unclear. Criterion (a) has been reworded to provide clarity.	<b>Amendment to Policy CFLR6 (renumbered CFLR7)</b>  (a) <del>The proposal is not sited in a prominent location</del> <u>The proposal is sited or landscaped to minimise visual intrusion;</u>
18.38	CFLR6 (c)	Suggested additional wording: 'Particular regard will be had to the cumulative effect of proposals on local landscape or biodiversity interests.'	Agreed.	<b>Amendment to Policy CFLR6 (renumbered CFLR7)</b>  (c) The siting, scale and design of the proposal is in keeping with the character of the area, with adequate pasture to support horses. Particular regard will be had to the cumulative effect of proposals <u>on local landscape or biodiversity interests.</u>
<b>Community Facilities</b>				
18.39	Section 18.8	The Plan does not make suitable provision for new places for religious worship. This should be included to assist religious groups seeking places for religious worship.  Buntingford has been highlighted as an area where religious facilities are needed.	The Plan clearly recognises that places of worship are community facilities. As such Policy CFLR7 (renumbered CFLR8) and New Policy CFLR9 (Loss of Community Facilities) supports the diversity of faith communities by requiring the provision of adequate and appropriately located facilities in conjunction with new development, as well as protecting existing facilities.  In addition Policy CFLR8 (IV) (renumbered	<b>No amendment in response to this issue</b>

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			CFLR 10) refers to new facilities for community use, 'including for the practice of faith'.	
18.40	Section 18.8	HCC comment that as a result of the proposed development in the District Plan, Services for Young People will look to enhance the existing resources for young people in Bishop's Stortford, Buntingford and Ware. The resource would be for the provision of youth work, information, advice and guidance.	Comments noted. The District Council will continue to work with relevant partners and providers to seek to ensure adequate youth service provision is provided as a result of future growth in the District.	<b>No amendment in response to this issue</b>
18.41	Section 18.8	HCC Children's Services and Children's Centres are often but not exclusively provided on school sites. Information provided on the current position and requirements arising from the proposed development for the provision of Early Years facilities.	Noted.	<b>No amendment in response to this issue</b>
18.42	18.8.3	Paragraph requires that 'any shortfall in provision' must be addressed 'as part of' new developments. This implies that existing infrastructure deficits are to be made up by new developments. If this is the case this is contrary to the legal tests within the Community Infrastructure Levy Regulations.	Comments noted and clarification provided.	<b>Amendment to paragraph 18.8.3 (renumbered 18.9.3)</b>  As new developments require good access to facilities and create additional demand for existing facilities, so any shortfall in provision <u>arising as a result of new development</u> , must be addressed as part of the development.
18.43	CFLR7	Sport England supports (IV). Dual/multiple use of facilities is often an efficient and sustainable way of meeting local needs especially in rural areas such as East Herts. Approach accords with NPPF Paragraph 70 which encourages the provision and use of shared space.	Support noted and welcomed.	<b>No amendment in response to this issue</b>

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18.44	CFLR7	McMullen & Sons Limited would like to see a District Plan that facilitates the long term viability of pubs, particularly those in rural areas. This would involve the presumption that they can be developed and expanded to a size sufficient to provide food on an economical scale with a kitchen, storage and car parking facility to match. This would redress much of the national legislation that seeks to inhibit the sale of pubs while doing nothing to enable their viability.	<p>Comments noted. Additional wording is suggested to reflect the important role that public houses play in rural communities.</p> <p>Policy CFLR7 (renumbered CFLR8) already supports in principle minor extensions or alterations to existing premises which are essential to the continued viability of the business and the vitality of the village (where there is no conflict with other policies in the Plan).</p>	<p><b>New Paragraph 18.9.8 added</b></p> <p><u>18.9.8 Public houses play an important role in rural communities, providing a social venue, local employment opportunities and adding to the vitality of a village.</u></p>
18.45	CFLR7	The Theatres Trust recommends for clarity and consistency that the following is included: 'community facilities provide for the health and wellbeing, social, educational, recreational, leisure and cultural needs of the community.' This would obviate the need to provide examples.	Agreed, description provides clarity. However, it is considered helpful to also include examples as set out in paragraph 18.8.1 (renumbered 18.9.1).	<p><b>Amendment to paragraph 18.8.1 (renumbered 18.9.1)</b></p> <p><u>Community facilities provide for the health and wellbeing, social, educational, recreational, leisure and cultural needs of the community.</u> Community facilities include, but are not limited to: art galleries...</p>
18.46	CFLR7 I (b) & (c)	<p>Part 1 (b) should be amended to refer simply to replacement provision, rather than enhanced provision. As drafted the policy appears to require betterment through development proposals which is not supported by the legal tests in the CIL regulations.</p> <p>Part 1 (c) should be amended to refer to an 'alternative community facility <i>or other use</i>, the need for which would clearly outweigh the loss'. As drafted the policy precludes the possibility that a community facility could be replaced by another form of development.</p>	<p>If demands are increased by new development then it is appropriate to seek to improve existing facilities in order to support that demand.</p> <p>The purpose of this part of the policy is to prevent the loss of essential community facilities and secure their replacement as necessary. If the suggested change is made then this leaves the policy open to misuse.</p> <p>Note: Policy renumbered Policy CFLR9</p>	<p><b>No amendment in response to this issue</b></p>

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18.47	CFLR7 III (b)	Policy CFLR7 requires proposals to provide for the dual or multiple use of facilities for wider community activities. This is often not suitable for religious needs. CFLR III (b) should be amended to read ‘...to enable multiple uses throughout the day, except where this would conflict with the purpose of the facility, such as facilities used for the practice of faith.’ Alternatively a new clause could be added to CFLR7 which makes specific provision for dedicated facilities used for public religious worship.	Dual/multiple use of facilities is an efficient and sustainable way of meeting local needs especially in rural areas such as East Herts. The approach accords with NPPF Paragraph 70 which encourages the provision and use of shared space.  (IV) states that proposals ‘ <u>should aim</u> to provide for dual or multiple use of facilities....’ The use of the word ‘should’ leaves rooms for exceptions, allowing applicants to justify why the policy does not apply to them. If particular circumstances exist which mean that multiuse is not possible then any application would be considered on its merits.  Note: Policy renumbered Policy CFLR9	<b>No amendment in response to this issue</b>
18.48	CFLR7 III (c)	The Environment Agency supports part III (c).	Support noted and welcomed.	<b>No amendment in response to this issue</b>
<b>Health and Wellbeing</b>				
18.49	18.9	Based on the housing figures set out in the draft Plan, 18 additional GP’s would be required. This would require additional surgery premises of a minimum of 3,582m <sup>2</sup> across the areas affected.  Currently, there are concerns in respect of the capacity of local practices to accept the impact of additional patients from developments in Bishop’s Stortford, Buntingford, Hertford, Sawbridgeworth, Ware, Gilston, East of Welwyn Garden City and practices affected by Group 1 Villages.  Based on this, NHS England would be looking for	Comments noted. The District Council will continue to work with NHS England to ensure that adequate health care provision is provided as a result of housing growth.	<b>No amendment in response to this issue</b>

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		significant CIL and/or S106 contributions to support General Medical Service provision in the area.		
18.50	18.9	Concern that the level of growth in the district will not be accompanied by adequate NHS facilities. There are A&E departments available in Essex and Stevenage. The future provision at QE2 seems vague. The time and distance that it takes to reach a hospital is a major concern especially with the growth in the elderly population.	Comments noted. The District Council are currently working with NHS England to ensure that adequate health care provision is provided as a result of housing growth.  CFLR8 (renumbered CFLR10) requires contributions towards new or enhanced health facilities where new housing results in a shortfall or worsening of provision.	<b>No amendment in response to this issue</b>
18.51	18.9.2	Sport England support the role that planning can have in encouraging healthy and inclusive communities. The reference to Sport England guidance is endorsed although it is suggested that explicit reference is made to their Active Design guidance document as this is the most relevant document in the context of how development can be designed to encourage physical activity.	Agreed.	<p><b>Amendment to orange box following paragraph 18.9.2 (renumbered 18.10.2)</b></p> <p><del>The Sport England guidance note on Planning Activity into Developments can be viewed and downloaded at :</del>  <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/">www.sportengland.org/facilities-planning/planning-for-sport/</a></p> <p><u><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">The Sport England guidance note on Active Design provides a set of design guidelines to promote opportunities for sport and physical activity in the design and layout of development and can be viewed here:</a></u>  <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a></p>

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18.52	CFLR8	The Canal & River Trust supports Policy CFLR8 and recognises that waterspace and towpaths along with other forms of open space and green infrastructure can play a big role in the promotion of healthy communities on many levels. In areas of new development, these areas could be considered as places to provide and enhance informal health facilities, such as open air gyms.	Support and comments noted and welcomed.	<b>No amendment in response to this issue.</b>
18.53	CFLR8	Natural England states that CFLR8 (I) may be enhanced by specific reference to Green Infrastructure as this could be used to deliver the infrastructure and health benefits listed.	It is considered that the role of Green Infrastructure is clear within the Policy.	<b>No amendment in response to this issue</b>
18.54	CFLR8	The Theatre's Trust highlight recent guidance on health and wellbeing, whilst wellbeing is not defined it is considered that health should also include social and cultural wellbeing. It is suggested that 'wellbeing' be included in the enhancement and provision of community facilities and retain Policy CFLR8 solely for health and the provision of medical facilities, or incorporate an item on health facilities within Policy CFLR7 as it deals with community facilities.	Changes are already proposed to capture social and cultural wellbeing in paragraph 18.8.1 (renumbered 18.9.1). Therefore Policy CFLR7 (renumbered CFLR8) will capture those elements under the umbrella of community facilities.	<b>No amendment in response to this issue</b>
<b>Education</b>				
18.55	18.10	Education is mentioned last almost as an afterthought; should be much more prominent! A lot of waffle and extremely vague.	Education is not an afterthought. Section 18.10 (renumbered 18.11) clearly acknowledges the importance of access to education. There is also a section on Lifelong Learning in Chapter 14 (Economy), which acknowledges the importance of higher education and adult learning opportunities.	<b>No amendment in response to this issue</b>

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18.56	18.10	There is a shortage of local places in Hertford/Ware but that is due to students travelling long distances from other towns. You probably can't do anything about schools autonomy but this should recognise that the shortage isn't due to a local imbalance.	Comments noted. The District Council is working closely with Hertfordshire County Council to ensure that there are sufficient school places available to serve new housing developments.	<b>No amendment in response to this issue</b>
18.57	18.10.3	<p>HCC comment that it may be more relevant for the Plan to point out the need for HCC, the District Council and developers to work together to ensure the best outcome for school provision. This joint working is alluded to in CFLR9.</p> <p>The last sentence of paragraph 18.10.3 should be reworded to identify that investment will come from housing growth in direct response to the demand that growth will generate.</p>	Agreed. Reference also added to other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments, to ensure appropriate facilities are provided.	<p><b>New paragraph 18.11.4</b></p> <p><u>To ensure the best outcome for school provision, applicants should work with HCC, the District Council and other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments, to ensure appropriate facilities are provided.</u></p> <p><b>Amendment to paragraph 18.10.3 (renumbered 18.11.3)</b></p> <p>...It is therefore vital that <u>where housing growth results in increased demand this should provide for</u> investment is made across each education tier to ensure there are enough places to serve the district's pupils within their community.</p>
18.58	CFLR9	Essex County Council recommends that CFLR (I) should read: "Development that creates a potential increase in demand for education will be required to make appropriate provision for facilities either on-site or by making a suitable contribution towards the improvement or expansion of nearby existing facilities.	Agreed. See also new paragraph 18.11.4.	<p><b>Amendment to Policy CFLR9 (renumbered CFLR11)</b></p> <p>I. ...Applicants will be expected to work in partnership with Hertfordshire County Council <u>and</u></p>

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		Applicants will be expected to work in partnership with HCC and other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments, to ensure appropriate facilities are provided.”		<u>other neighbouring local authorities with a duty for ensuring that there are sufficient school places available to serve new housing developments,</u> to ensure appropriate facilities are provided.
18.59	CFLR9	<p>Policy supported, however, it does nothing to assist in positively planning for the physical delivery of school expansions in the Green Belt.</p> <p>The LPA should ensure there is a more favourable policy context seeking to guide and facilitate school expansions - not just new schools.</p> <p>The soundness of the Plan would be improved if the Local Planning Authority identifies an education zone within the Green Belt to cover the school and school reserve land. The policy applying to it could be worded along similar lines to those to be found in the adopted Dacorum Core Strategy:</p> <p>‘The provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt. Zones will be defined in the Green Belt where there is clear evidence of need: the effect of new building and activity on the Green Belt must, however, be minimised.</p> <p>All new development will be expected to contribute towards the provision of social infrastructure.’</p> <p>The LPA could identify an education zone at Watton School covering both the operational school site, the reserve land adjacent and the Early Years Centre.</p>	<p>Support welcomed, however, an education zone approach is not considered necessary, or one that can be evidenced.</p> <p>The Council is currently undertaking further Green Belt Review work which will include looking at the Watton School site.</p>	<b>No amendment in response to this issue</b>

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18.60	CFLR9	A number of additional schools are proposed which have more to do with Mr Gove's Central Government dictates than planning. The allocation of Simon Balle for an additional primary school is an example. The area already has 3 primary schools and the new school should go near the centre of the town where there is a need. There is no indication that new development should be to the highest environmental standards.	<p>Comments noted, however, planning permission for the primary school at Simon Balle has now been granted.</p> <p>Chapter 16 – Design – provides information on how to design developments in the most sustainable way including reference to Building Futures and Building for Life 12. Policy DES1 requires all development proposals to be of a high standard of design, including embracing sustainable construction. The Plan as a whole addresses the major sustainability issues that arise when constructing a new building.</p>	<b>No amendment in response to this issue</b>
18.61	CFLR9	<p>HCC support this policy.</p> <p>However, under part III (a) the meaning of 'suitably located' is unclear. Within a development where a new school is required this facility would be expected to be provided within the development site.</p> <p>In terms of the expansion of an existing school to provide school places arising from a new development, 'suitably located' may not mean the nearest school to that development. A number of schools are located within school place planning areas. It may not be possible to expand the closest school to a development but another in that area may have the ability to provide additional capacity.</p>	<p>Part I of CFLR9 (renumbered CFLR11) contains the flexibility needed for new provision to be located in line with both the needs and where improvements are possible.</p> <p>Part III.a could be changed to 'be in an accessible location', served by a choice of sustainable travel options.</p> <p>Reference could also be added to Policy DES1 as this covers issues such as siting of development.</p>	<p><b>Amendment to Policy CFLR 9 (renumbered CFLR 11)</b></p> <p>Part III.(a) be <u>in an accessible location</u> <del>suitably located</del>, served by a choice of sustainable travel options;</p> <p>(b) Be of the highest quality of design which offers flexible use of facilities, in order to ensure the various needs of the community can be met, <u>in accordance with Policy DES1 (Local Character and Amenity)</u> (see also Policy ED6 (Lifelong Learning));</p>
18.62	CFLR9 III (b)	HCC comment that highest quality design can often mean higher construction costs. The design of any new school building would take account of the principles of sustainable development, together with the sensitivities of its setting, including, where	Concern noted, however, the policy states that proposals 'should' be of the highest quality of design. The use of the word 'should' leaves rooms for exceptions, allowing applicants to justify why the policy	<b>No amendment in response to this issue</b>

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		relevant, its relationship to any listed buildings or Green Belt location. There is a finite budget when providing new or extended schools and it should be noted that many of these facilities will be funded by developer contributions. It is requested that this wording is reconsidered.	does not apply to them.	
18.63	CFLR9 III (c)	Sport England support criterion (c) of this policy as the provision and retention of outdoor recreation space and playing fields are one of the principal forms of community playing pitch provision. Due to the difficulties associated with finding suitable sites and delivering new dedicated community playing fields in East Herts, new school playing fields represent one of the main opportunities for assisting to address community needs. Also, the provision and retention of playing fields enables schools to meet curricular and extra-curricular PE and sport's needs.	Support noted and welcomed.	<b>No amendment in response to this issue</b>
18.64	CFLR9 III (d)	Sport England support criterion (d) of this policy as this should help ensure that new schools are designed to facilitate community use which would help meet community needs as well as principal educational requirements. This approach accords with NPPF paragraph 70.  CFLR1 should also be cross referenced as this covers proposals for dual use facilities in the context of open space, sports and recreation.	Support noted and welcomed.  (d) amended to also refer to CFLR1 (IV)	<b>Amendment to Policy CFLR9 (renumbered CFLR11)</b>  (d) Be designed to facilitate the community use of facilities, in accordance with Policy CFLR7 (Community Facilities) <u>and Policy CFLR1 (IV) (Open Space, Sport and Recreation)</u> .
18.65	CFLR9	Pleased that the draft plan recognises that Stanstead Abbots primary school has reached capacity. However concerned that the growth in Hertford and Ware will make it harder for Stanstead Abbots children to get into the best secondary schools.	Noted.	<b>No amendment in response to this issue</b>