

Name	Organisation	Summary of comments
Robert Fielden	The Hertfordshire & Essex High School and Science College (H&EHS)	<p>Comment as follows:</p> <ul style="list-style-type: none"> - General: although the school is not located within the neighbourhood plan area, the school welcomes a comprehensive development plan for Bishop's Stortford. Believe the plan to be well thought out and welcome the section on education. - 3.4.2.1: H&EHS do not believe one 6 FE secondary school located within the Bishop's Stortford North development will be adequate to meet the town's future education needs. H&EHS estimate 12FE will be required. H&EHS identify that the Bishop's Stortford south site in the East Herts emerging District Plan reserved for 17 Ha of education use is the last site available for development large enough to accommodate a secondary school but estimate 20 to 22 Ha is more appropriate.
Andrea Gilmour	Hertfordshire Property and Technology, representing the interests of Children's Services, Health and Community Services, Libraries and Community Protection.	<p>Comments as follows:</p> <ul style="list-style-type: none"> - 3.1.4: HCC support the housing objective. - HDP4: 'specialist housing' is not defined. - HDP6: provision of specialist housing within residential schemes is welcomed, however as mentioned above, is not clear. - HDP7: multi-purpose facilities is welcomed. HCC Services for Young People want to enhance existing facilities and would be seeking S106 contributions for the Northgate Centre. Also, they would want to see employment, apprenticeship and work experience opportunities for young people as part of

		<p>the build process.</p> <ul style="list-style-type: none"> - Education: HCC is statutorily responsible for ensuring a sufficient supply of school places across the Bishop's Stortford education planning area. At primary level HCC seek school places as close to demand as possible. At secondary level pupil movement is more complex, within the school places planning area of Bishop's Stortford and Sawbridgeworth there are six secondary schools with an independent school. - EP2/3: as part of ASRs 1-4 HCC have negotiated the provision of primary and secondary school sites to serve the development and to meet the needs of the area as a whole. Detailed matters would be considered as part of the planning application for the new school. - EP4: Any new school would be a free school or academy, HCC seeks to secure sites of an appropriate size and geography for the delivery of new primary schools based on HCC site standards. The timing and delivery of new school places would be negotiated through planning obligations. - It is noted that there is no reference to nursery education or Children's Centres. HCC has a statutory responsibility to provide Free Early Education for 3 and 4 year olds; to provide 15 hours FEE to eligible vulnerable 2 year olds; to ensure there are sufficient childcare places for 0 -14 years children in pre-schools, day nurseries and out of school clubs; to deliver Children's Centres in every community(the provision for a Children's Centre would be appropriate in the Bishop's Stortford North area however Children's Centres are a network and are not independent of one another as families can use any centre in the town, as there is high mobility early year's provision can be effected in all parts of the town by new developments). HCC closely monitors the provision available in
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		<p>the three defined geographical areas within Bishop's Stortford as this can easily change depending on a number of variable factors.</p> <ul style="list-style-type: none"> - Business and Employment: support as it includes supporting community services in this area.
<p>Paul Chappell</p>	<p>HCC, Highways Department</p>	<p>Comments as follows:</p> <ul style="list-style-type: none"> - TP1: HCC does not support the inclusion of a 5% threshold; the appropriate traffic threshold for mitigation measures should be considered on a case by case basis by HCC as the Highway Authority. The threshold should relate to the capacity of the highway itself and the ability to accommodate additional traffic. - 2.4.1.1: Support but should be reflected in the ensuing policy. - GIP6: supported. - GIP7: vehicle access may not always be possible and input from HCC will be required; this should be included within the policy. - 3.3 Transport: Policy Context and Background – the Eastern Herts Transport Plan and the Speed Management Strategy should be key considerations. - TP3: this policy is not in accordance with national or local policy, the scope of traffic modelling analysis within a Transport Assessment is normally agreed between the applicant and HCC. - TP5: HCC would prefer that sustainable travel to and from new development is assessed on a case by case basis.

		<ul style="list-style-type: none"> - TP6: Agree to the definition of 'significant' development as defined within the Roads in Hertfordshire: Highway Design Guide 3rd Edition. - TP8: EHDC Supplementary Planning Guidance should be used as guidance for the 'size' and number of cycle parks required. - TP9: Concern that the level of car ownership (3% higher than the whole of Hertfordshire County) is used as justification to encourage higher levels of off-street parking within new residential development. The transport strategy should be consistent with LTP3. - TP10: Comment that the emphasis upon encouraging more car parking within the town centre to ensure commercial vitality and viability should not be at the expense of using sustainable modes of transport to access the town centre. HCC supports the clause that developers may be required to contribute to accompanying measures to encourage modal shift. Also, support that TP10 refers to the EHDC Parking Standards and the guidance contained within Roads in Herts. - TP11: noted that the policy requiring a 20mph speed limit for residential development has been qualified with the additional of 'unless there are overriding reasons for accepting higher speeds.' - EP2: Noted. - BP6: Comment that contributions towards transport improvements should be in line with HCC's Planning Obligations toolkit and should seek to promote sustainable modes. On-site parking for new developments are outlined within the parking standards set by EHDC and should be referenced in this policy.
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<p>Odette Carter</p>	<p>Herts and Middlesex Wildlife Trust</p>	<p>Comments as follows:</p> <ul style="list-style-type: none"> - 2.1: The Trust emphasise the importance of ensuring that the green infrastructure network as a whole is planned and managed appropriately, in a way that ensures the ecological functions are delivered in parallel with amenity and other benefits ecosystem benefits that green infrastructure can provide local people. - 2.3: Support the general aims. - 2.3.1.1: welcomes the importance placed on the River Stort and should be a focus for ecological enhancement opportunities. - 3.2.2: Comment that ensuring the protection and enhancement of biodiversity is integral to this objective, particularly the management of leisure and recreation so that it complements the biodiversity objectives. - 3.2.2.8: recommend that the plan references the Stort Catchment Management Plan and seeks to embed its objectives in its policies. - GIP1: concerned with the policy wording, it is vital that such areas are retained and managed appropriately to safeguard and enhance their ecological interest in the long term, whilst improving access to nature locally and providing opportunities for informal recreation. Therefore clarification is sought in the wording of this policy to make it clear that enhancement of biodiversity and maintaining and improving ecological functioning and connectivity is a concomitant objective in protecting local greenspace. - GIP2: Policy is broadly supported. Formal parks and ornamental gardens have a valuable role however, these should not result in the loss of ecological
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		<p>assets. Open spaces and recreational facilities are encouraged to be designed and managed in a way that retains or restores ecological connectivity and wildlife space. Agree that signage etc should be used to encourage access to the local natural environment.</p> <ul style="list-style-type: none"> - GIP5 a): Planting should be appropriate to the ecological character of the area, therefore suggest 'new native planting' be added to the wording in the second sentence. Any woodland creation projects or tree planting should only be undertaken in areas where this is ecologically appropriate and not harm other ecological interests. Also selective thinning, coppicing, pollarding etc are important aspects of positive woodland management. Suitable consultation and ecological expertise should always be fed into any plans to ensure proposals are appropriate to the area. - GIP5 b): welcomes the protection and buffering of watercourses and restoration of modified watercourses. Suggest the plan refers to the Catchment Management Plan for the Stort. Also, suggest that policy wording be added to ensure future developments, where appropriate, to the aims and objectives of the Stort Catchment Management Plan. - GIP c): welcomes the reference to wildlife corridors. - GIP e): policy welcomed.
<p>Mark Montgomery</p>	<p>Hertfordshire Constabulary</p>	<p>Comments as follows:</p> <ul style="list-style-type: none"> - Comment that paragraph 69 in the NPPF are not referenced which also deals with crime, disorder and the fear of crime. - HDP3: supports this section of the document that promotes the aims of

		Secured by Design.
Dr Steve Rowlatt	Individual	<ul style="list-style-type: none"> - Comment: the plan should take more account of the disabled, elderly, mothers and buggies. The following should be made available and implemented within the town: wheelchairs and electric scooters should be able to access all areas; small buses, escalators and lifts should be implemented to get around the town; hearing loops should be widely available; toilet facilities should be accessible for disabled and elderly people; RADAR keys should be used. The town centre should be pedestrianized.
Louise Harris	Housing Development and Strategy Manager, East Herts District Council	<p>Comments as follows:</p> <ul style="list-style-type: none"> - HDP4 a): Sheltered and supported housing is required but is heavily dependent on revenue funding which requires support from the County Council. - HDP4 b): Wording reflects the Supplementary Planning Document for Affordable Housing and Lifetime Homes. - HDP4 c): This does not reflect current Housing policy or emerging policy in the draft District Plan. The policy does not seek a funding contribution on small scale schemes for off-site provision. - HDP4 d): The wording of the policy is not clear which form of housing this might apply to. Self-build is not a defined form of affordable housing in the NPPF. - HDP4 e): This reflects the pepper potting policy as set out in the Supplementary Planning Document for Affordable Housing and Lifetime Homes- section 6.20 could be quoted directly.

		<ul style="list-style-type: none"> - HDP5 a): Comment that Lifetime Homes Policy does not look at unit sizes but the entire scheme.
David Hammond	Natural England	<p>Comments as follows:</p> <ul style="list-style-type: none"> - 2.3.11: pleased to see the reference to the provision and enhancement of Green Infrastructure; welcomed and to be encouraged. - GIP1-9: broadly supported. - General: the provision of green infrastructure as part of new build development proposals can provide opportunities to enhance and increase open/green space provision, provide links to and across existing facilities, through green chains corridors and potentially help towards promoting sustainable transport options such as cycling and walking.
Jane Hennell	Canal and River Trust	<p>Comments as follows:</p> <ul style="list-style-type: none"> - General: supporting the inclusion of a short stretch of the River Stort Navigation within the neighbourhood plan area. The River Stort, River Stort Navigation and its towpath can make a valuable contribution towards the aims of the plan and it provides a link from the neighbourhood plan area towards the town centre. - The plan correctly identifies rivers and canals as Green Infrastructure however would recommend removing the word 'exploit' due to its negative connotations, rather 'seize opportunities' or 'encourage opportunities' should be used. - TP5: Support the need for new development to enhance the cycle/walking

		<p>network, within the site and to the town centre.</p> <ul style="list-style-type: none"> - Main concern of the Canal and River Trust to ensure the structural integrity, navigational safety and positive attributes of the river corridor is not compromised by future development. Work in close proximity to waterway can result in damage to the structural integrity of the waterway, result in pollution or increase flood risk. - The provision of water-based leisure facilities such as slipways and launch points could be better promoted with the navigational safety of all users as a primary aim.
Jenny Volp	Highways Agency	<p>Comments as follows:</p> <ul style="list-style-type: none"> - TP1: deals mainly with the impact of new development on the local road network, these developments may also have an impact on the strategic road network, particularly the M11. - It may be worth mentioning the concerns raised regarding Junction 8 of the M11 at TP1.
Ruth Clifford	Stansted Mountfitchet Parish Council	<ul style="list-style-type: none"> - Comments in regard to the Bishop's Stortford North development and the impact upon Stansted. - The road network should be improved and reconfigured; there should be regular bus services across the new development, the town centre and the railway station, there should be incentives to encourage people to use buses; residents should be discouraged to travel to Stansted railway, which has inadequate car parking; the new secondary school should be located where cars do not have to access the town centre; existing primary school provision at

		<p>Farnham village school should be taken into account when considering future primary school provision; green wedges should be kept; the separation between this development, Stansted Mountfitchet and Birchanger should be maintained; this development should be bounded by the A120.</p>
<p>David Barnes</p>	<p>Star Planning and Development on behalf of the Bishop's Stortford North Consortium Limited.</p>	<p>Comments as follows:</p> <ul style="list-style-type: none"> - General: the Consortium comment that they are unsure about the timing of the neighbourhood plan as there is no up-to-date Local Plan. Also, that there may be some confusion and uncertainty over what the neighbourhood plan is actually seeking to deliver. The rationale for developing the neighbourhood plan was to influence the determination of the Bishop's Stortford North planning application that falls within the neighbourhood area. However, the main focus is now on delivering the planning application rather than shaping the scheme. - BP1/2/3: it would be beneficial if these policies recognised the local centres and employment provision within the BSN scheme which now has a resolution to grant planning permission. - EP2/3/4: Object, it is not within the Neighbourhood Plan's authority to identify that a school 'must be built' rather the Town Council can encourage a school be built, nor to identify the facilities to be provided. - HDP2/3/5: Object for the following reasons: it is a matter for Building Regulations to establish standards for housing; where there is a local variation this is a matter for a Local Plan and not a neighbourhood plan; there is no evidence of local need; there is no viability testing of the implications of the application of the neighbourhood standards. - Monitoring: if adopted later, to-date policies in the emerging District Plan will

		<p>supersede those in the neighbourhood plan; the monitoring regime is based upon consideration of planning applications which is inadequate. More effective monitoring of how the policies are being applied and their outcomes need to be undertaken. Also, there are no metrics or frameworks to indicate what the successful outcomes of the neighbourhood plan are.</p>
	<p>Rapleys on behalf of Silver Spoon.</p>	<p>Comments as follows:</p> <ul style="list-style-type: none"> - General: the neighbourhood plan is being produced in advance of the up-to-date District Local Plan. - BP4: Support - this policy enhances the quality of existing commercial premises which enhance employment and economic benefits to the local community. - GIP5 b): the requirement for how watercourses should be incorporated within a development is too prescriptive and should not be applied to all proposals. Proposals in association with the factory operation or areas which do not relate to the watercourse should not be expected to meet these requirements. - GIP6 e): Object – this seeks financial contributions or direct provision of new infrastructure from any development proposal. This is an onerous requirement and will prevent sustainable growth. - GIP9: Object – certain types of development including general industrial uses are classified as ‘less vulnerable development’ which is appropriate in Flood Zones 3 and 3a. Therefore Sequential Test and the Exception Test should not be required for proposals which relate to the existing factory or sites allocated for development.

		<ul style="list-style-type: none"> - TP1 b): Object – this requirement is considered unreasonable and unjustified as the NPPF advises that development may only be prevented on transport grounds where cumulative impacts of development are considered severe. - TP2: Object - for the same reasons as above. - TP3: Object – the requirement outlined in TP3 a) overrides the Highway Authority and the applicants' responsibility to agree the scope of a Transport Assessment. The TA should be considered on a case by case basis, therefore this should be deleted. - TP5: Object: a) and f) are onerous requirements as it states all development must deliver a package of pedestrian and cycle improvements. The wording of these should be amended for greater flexibility. - HDP1: Comment - concerned that this policy places an onerous requirement for applicants to update a SHMA and could undermine the delivery of housing development. - HDP 2a): Object – the proposed approach does not respond to circumstances where development could not achieve 'green' against all criteria therefore it should be amended. - HPD 2c): – Object – considered to be an onerous requirement as materials should be chosen on a case by case basis to reflect the form of the building, use and the proposals' site context. - HDP4 a): – Object – the dwelling mix should accord with the Local Plan policies, the site's context and the character of the area. - HDP5: Object – this policy goes beyond the scope of planning control to seek
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		<p>design standards to be met for certain percentages or types of houses to be made available to first time buyers or non-first time buyers.</p> <ul style="list-style-type: none">- GIP3: – Object – the requirement for developers to establish long-term arrangement for the management of open spaces of schemes over 100 homes is considered unviable for brownfield sites.- GIP8: – Object – this provision is not considered to be an infrastructure requirement in the Local Plan or NPPF.- EP1/HP1: – Object – appropriate school and health care provisions will be sought under the relevant provisions of the Local Plan.
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