

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
Introduction				
16.1	16.1.2	Statement is supported	Support noted and welcomed.	No amendment in response to this issue
16.2	16.1.3	Statement is supported The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
Design Objectives				
16.3	16.2	Whilst the Plan does accommodate for disabled and elderly populations, this must be made clearer. In particular, there should be greater detail of design for elderly, wheelchair and disabled users in town centres, in particular Bishop's Stortford including dropped kerbs and level areas. Also, better facilities to reflect their needs, for example, wheelchair accessible toilets, electric scooters for hire, small buses for short journeys, RADAR keys.	<p>The Council welcomes this comment and is keen to accommodate for the less mobile members of the community, particularly for the ageing population and those who may suffer from forms of dementia. This falls under the Design Objectives which state that any development proposal should be usable, in terms of accessibility and be socially inclusive. Any development proposal will be assessed against these criteria and efforts should be made at the time of the application to meet this objective.</p> <p>Paragraph 16.7.10 adequately deals with how the built environment should promote independent lifestyles in particular for those with restricted mobility. However, new words could be added to Part III of DES 1 to strengthen this approach.</p>	<p>Amendment to text (DES 1 Part III)</p> <p>(a) Maximise legibility <u>and accessibility</u> of the public realm through the layout of buildings, landmarks, <u>use of colour</u>, landscaping, paving, high quality public art, street furniture and infrastructure including <u>clear and legible signposting</u>, <u>rest places</u> and <u>public toilets</u>, in a way that maintains uncluttered spaces and enabled easy navigation and movement through the space</p>
16.4	16.2.1	The Environment Agency support the design objectives.	Support noted and welcomed.	No amendment in response to this issue
16.5	16.2.1 and 16.7.9	The Canal and River Trust support the design objectives. However, they request that water spaces should be recognised as public realm and integrated into the design rather than as a backdrop.	Any development that is in proximity to water spaces should have a positive, integrated design appropriate to its setting. Additional words should be added to the bullets in 16.2.1 and to paragraphs 16.7.2 and 16.7.9 to refer to waterscape as part of overall landscape considerations.	<p>Amendment to text:</p> <p>16.2.1 Incorporate <u>water</u>, planting and landscaping into the overall design...</p> <p>16.7.2 Buildings and landscapes that demonstrate a distinct character and are aesthetically pleasing, contribute greatly to the success of a place. Many modern development schemes (especially schemes involving a</p>

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				<p>number of dwellings) can be bland and generic. However, if a development scheme is based on a sensitive understanding of site and context, it can exhibit a distinct character and identity while also belonging to the wider locality. <u>For example, development in proximity to water spaces should respond to and incorporate the water space in the design to add to the character of development.</u> Therefore successful development should respond to locally distinctive patterns of development,</p> <p>16.7.9 Public realm refers to all publicly accessible open spaces and public and civic building facilities, publicly owned streets, pathways, <u>water spaces</u>, rights of way and parks.</p>
Sustainable Design				
16.6	16.3	New houses should meet Passivhaus standards and include solar panels, and grey water systems.	The Council understands the importance of sustainable design however it is considered too onerous a requirement for all new development to meet each of these standards. 16.3 Sustainable Design is considered to adequately promote sustainable development through design by encouraging use of the Building Futures toolkit and Building for Life standards. DES1 states the expectations of using new technologies including zero or low carbon energy and water systems. It is considered that the current policy wording satisfies this.	No amendment in response to this issue
16.7	16.3.2/16.4	The reference to Building Futures online resource is welcomed. It is suggested that this could be strengthened by encouraging all proposals to submit a 'Sustainable Design Statement' and not just those required under	Paragraph 16.4.1 already directs applicants to provide clear evidence that design principles based on sustainable development objectives have been integrated into the proposal. Paragraph 16.4.1 third bullet could be expanded.	Amendment to text (para 16.4.1) That where necessary, a Design and Access Statement has been completed and accompanies the application. <u>The Statement should</u>

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		national criteria, to explain how the placemaking and sustainable principles set out in the Development Plan have been implemented in the proposal by using the <i>Building Futures Sustainable Design Toolkit</i> .		<u>make it clear how the proposal has integrated sustainable design principles into the scheme,</u> Applicants will be encouraged to use the Building Futures...
Design Reviews				
16.8	16.6	Section is welcomed. EHDC are encouraged to promote the use of Hertfordshire Design Review Panel in assessing development proposals before they are submitted and to assist the development management process and during the preparation of site specific documents. This could be achieved by setting a policy requirement for identified sites to undertake a design review process at an early stage. This would create a level of certainty within the planning and development management process for EHDC, developers and other stakeholders.	The Council recognises the merits of the Design Review panel and at later development stages may utilise the panel when developing specific development strategies. Paragraph 16.6.3 outlines the types of proposals that are encouraged to use the Design Review. New text could be added to Part III of DES 1 as the Hertfordshire Design Review Panel is best placed to assess larger applications that will have an impact on the public realm.	Amendment to Policy DES1 III. Development proposals which create new or have a significant impact on the public realm should: <u>... (e) engage the Hertfordshire Design Review Panel as part of the pre-application stage and throughout the Development Management process where appropriate.</u>
Local Character and Amenity				
16.9	16.7.2	Density and mix of housing should reflect the character of the area.	Noted. There are a number of policies that support this statement. DES1 identifies that development should promote local distinctiveness. DES1 I(a) also focuses on how any development should have regard to the character and the surrounding area.	No amendment in response to this issue
16.10	16.7.3	The Canal and River Trust support this paragraph	Support noted and welcomed.	No amendment in response to this issue
Public Realm and Inclusive Design				
16.11	16.7.9	Legibility within the public realm should be maximised (to decrease the chance of Bartholomew Road/Trinity Street and Tanners Wharf occurring again.)	Comments noted. The section Major Developments is considered to deal with legibility within the public realm. 16.7.8 identifies the importance of any layout to be understandable, well-connected and inclusive. Importantly, the policy can only promote this as each	Amendment to text (para 16.7.9) Uncluttered and simplified street furniture, <u>which includes the provision of clear and legible</u>

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			application will be dealt with individually. New words could be added to paragraph 16.7.9 to refer to legible signage.	<u>signage where necessary;</u>
16.12	16.7.9	There should be a priority on sustainable modes of transport and a focus of the public realm around connections between modes of transport. Footpaths should be a cohesive network with safe places to access other forms of transport such as buses. The Policy does not deal adequately with priorities for walking and cycling networks to achieve healthy lifestyles.	It is considered that Chapter 17 Transport deals adequately with these issues. Chapter 18 Community Facilities Leisure and Recreation also incorporates these issues with a new section on Rights of Way.	No amendment in response to this issue
16.13	16.7.9	Provision needs to be made for the movement of goods and materials.	It is considered that 16.7.5 identifies the urban design principles that adequately deal with the impact of any development upon its environment. It is not considered possible to create a specific policy for this due to the range of uses that the development may have. At the point of application, appropriate area for the movement of goods and materials may be identified.	No amendment in response to this issue
16.14	16.7.9	The Plan should require developments to provide infrastructure that assists with sustainable design objectives such as cycle storage, EV charging points and disposal units for recycled materials.	Comments noted. New words could be added to paragraph 16.7.9 on the public realm. Policy DES I. e) outlines that all development proposals should make provision for the storage of bins and ancillary household equipment. Each development proposal at the point of application will consider the suitable siting of refuse. The Council supports and encourages sustainable modes of transport, it is therefore considered to be suitable for development to provide EV charging points or cycle storage where necessary.	Amendment to text (para 16.7.9) <u>Careful design that prioritises and promotes walking;</u> <u>Design that encourages cycling, including through the provision of safe and secure cycle storage;</u> <u>Uncluttered and simplified street furniture which includes the provision of clear and legible signage where necessary, EV charging points and recycling facilities;</u>
16.15	16.7.9	Request a policy on minimising light pollution, which is becoming a greater issue.	There is already a policy within the Environmental Quality Chapter (Policy EQ3: Light Pollution). Words could be added to paragraph 16.7.9 to refer to	Amendment to text (para 16.7.9) Lighting being integral to the design and not added at the end. <u>Lighting</u>

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			preventing light pollution.	<u>schemes should be designed to prevent light pollution.</u>
16.16	16.7.9	The landscaping and wildlife should benefit the community; should support planting native species.	Noted. The Council encourages the planting of trees, grassed areas and flowers to benefit the community. It is considered that 16.7.9 adequately supports this requirement.	No amendment in response to this issue
16.17	16.7.11	Commitment to the Lifetime Home Standard and Lifetime Neighbourhoods is welcomed. Recognising that the built environment needs to be fully accessible and houses should accommodate for all parts of society.	Support noted and welcomed.	No amendment in response to this issue
Policy DES1				
16.18	DES1	Reflecting and promoting local distinctiveness is supported in principle, but the policy should also support appropriate design innovation to allow for appropriately designed development of its time and to avoid pastiche development of one kind.	Policy DES1 I (a) requires that developments respect and improve upon the character of the site and the surrounding area subject to a range of considerations. The policy was deliberately worded to allow a flexible approach to design – respecting but not reflecting is the key point. I (d) refers specifically to embracing high quality innovative design.	No amendment in response to this issue
16.19	DES1	Wording should be stronger to ensure new development takes account of local architectural styles. Houses should be built to the best design achievable and reflect the intrinsic character of the area, not creating 'rabbit hutch' design and density.	This comment is noted. DES1 outlines that any development is required to promote local distinctiveness which is strengthened by DES1 I (a) and (f). The current policy wording is considered to reflect this.	No amendment in response to this issue
16.20	DES1	Driveways and garages should be of a suitable size and the Council should be more robust in its decision-making for such applications.	Comments noted. DES1 I (g) deals with this issue.	No amendment in response to this issue
16.21	DES1	DES1 criteria 'd' and 'f' need to be revisited following the Ministerial Statement concerning how standards for the sustainability and construction of new housing will be delivered via the Building Regulations rather than the planning system.	These are particular issues that are of considerable importance. If and when Building Regulations are amended the Policy can be amended to reflect these. The proposed changes will also make available optional enhanced standards for local authorities to adopt subject to local needs according to local	No amendment in response to this issue

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			circumstances or individual needs, and subject to viability testing. Until such matters are clarified it is appropriate to continue to raise these as particular issues of importance and be included in a policy. This will be kept under review.	
16.22	DES1	An objection to increased urbanisation. Some suggestions are proposed to enhance the rural character, such as: increased tree planting, designation of rural fringe areas for woodland to provide boundaries, better landscaping within town centres, policies to reduce street furniture to 'de-urbanise' the towns, the expansion of conservation areas to preserve the character of the towns and provide people more power to protect their local environment.	Comments noted. The Council supports differentiating between rural and urban areas. It is considered that the section <i>Public Realm and Inclusive Design</i> refers to these comments and the current policy DES1 wording supports the use of all of these.	No amendment in response to this issue
16.23	DES1	The NPPF suggests that in rural areas, development should make use of redundant buildings or sites, specific design policies should be used which guide on scale, density, massing, height, landscape, layout and materials.	It is considered that DES1 along with other policies in the Plan deal with this issue adequately. It is neither necessary nor appropriate for the Council to prescribe such matters as every case will be unique and therefore should be treated individually.	No amendment in response to this issue
16.24	DES1	In principle the design criteria are supported, it is recommended that certain specific requirements such as zero and low carbon energy are supported by an evidence base and up-to-date viability testing. Recommended that any policy should not be an onerous burden upon development.	The Council supports sustainable design and the current policy wording supports this. It is important that this is not an onerous burden upon development, however the Council maintains it should be an integral part of housing design. Studies have found that over time the cost of such technologies have reduced and will continue to do so and that through changes to Building Regulations they become standard costs and not an additional expense. Building such design into development is more cost-effective than retrofitting.	No amendment in response to this issue
16.25	DES1	Design should include rear access/storage for refuse.	It is considered that DES1 I (e) adequately deals with the storage of bins and ancillary household equipment. It is not always appropriate to create rear access where this can compromise security. Each case should be dealt with individually.	No amendment in response to this issue
16.26	DES1	There should be minimum car parking per	The Council's approach to vehicle parking provision is	No amendment in response to this

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		household.	set out in Policy TRA3 Vehicle Parking Provision. The Council is currently updating its SPD to reflect up-to-date Government guidance on standards. It is anticipated that these updated standards will in due course be incorporated into the District Plan.	issue
16.27	DES1	Developers should be required to incorporate underground parking facilities in all construction projects and housing development. This would ensure that development is more aesthetically pleasing.	Policy TRA3 Vehicle Parking Provision requires car parking to be integrated as a key element of design in development layouts to ensure good quality, safe, secure and attractive environments. The Council cannot however create policy requirements that are financially unviable. At the time of an application, appropriate parking will be identified to suit the development scheme.	No amendment in response to this issue
16.28	DES1	Encouraging green spaces in towns should be encouraged. The Garden City heritage of Hertfordshire should be an inspiration. Green spaces are also good for mental health.	Agreed. The Council aims to enhance and encourage green spaces through DES III b) which aims to maximise opportunities for urban greening. The Council will work with the relevant partners to ensure that green spaces are included in new development and the public realm is improved by new development. The health and wellbeing benefits of open space, vegetation and landscaping are acknowledged in Policy CFLR8 (now CFLR10).	No amendment in response to this issue
16.29	DES1	Policy should support appropriate design innovation, with reference to Para 58 in the NPPF.	It is considered that the section <i>Innovation</i> adequately defines how design innovation can be integrated into new and existing housing. As well as promoting design that does not stifle innovation, originality or initiative. Therefore the current policy wording is considered to reflect this.	No amendment in response to this issue
16.30	DES1	There should be sufficient access space for Fire and Rescue vehicles and refuse collections vehicles taking into account street parking needs.	Noted. Sufficient vehicular access is considered at the time of an application and all partners are consulted to ensure there is appropriate vehicular access.	No amendment in response to this issue
16.31	DES1	Whilst this section prescribes certain design principles and solutions to work in combination with site specific policies, when read in combination these policies do not translate the full range of placemaking and sustainable	The Plan should be read as a whole but it would be of benefit to refer to the Design policies within each site allocation policy within Part 1 of the Plan and to the refine the approach taken within site allocation policies.	Amendment to text (each site allocation in Part 1 of the Plan) <u>Developments will be expected to be in accordance with the sustainable design principles as set out in Policy</u>

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		<p>design principles.</p> <p>It is recommended that the policy is revised to focus on a core set of design principles that all development would adhere to and that piecemeal reference to design principles and solutions within the site specific policies is removed. This would present a clearer and more robust policy approach for developers to follow, requiring full and proper consideration of placemaking and sustainable design. For identified sites, the thematic policies would then be translated into the local context in a comprehensive fashion via a development brief/masterplan/SPD.</p> <p>Suggest revised principle list:</p> <ul style="list-style-type: none"> - Character (reflect local distinctiveness whilst not stifling innovation and the creation of distinct identities) - Continuity and enclosure of private and public spaces - High quality public realm and open space - Ease of movement (connectivity, accessibility and permeability of streets, routes, open space and blue/green infrastructure, in addition to policy TRA1) - Legibility of places and spaces - Adaptability and resilience of buildings and spaces to change and future environmental risks - Diversity of uses and building types - Efficient use of land - Safe, healthy and inclusive buildings and spaces - Attractive and welcoming buildings and places - Protection of private and visual amenity - Sustainable use and management of materials and resources 	<p>The principles referred to are standard approaches contained within guidance such as 'By Design'. Rather than repeat these principles out of context the policy seeks to frame this guidance within the issues that are of particular importance to the communities of East Herts in a language that is easier to understand.</p>	<p>DES1.</p>

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16.32	DES1	Policy supported, in reference to Great Munden Parish.	Support noted and welcomed.	No amendment in response to this issue
16.33	DES1	<p>Stansted Airport Ltd comments that design policies should refer to the needs for Aerodrome Safeguarding which is subject to direction and procedure contained within Circular 01/2003. They consider that it is highly advantageous that in preparing a spatial plan, that a specific policy and supporting text references are made to address the need to safeguard the civil aerodrome.</p> <p>This can be done by a singular policy or can be woven into specific policies. STAL would be happy to discuss the details of such alterations with the Council; however at the very least, the following areas are in need of consideration:</p> <ul style="list-style-type: none"> i. Buildings, structures, erections and works: any development that by virtue of its height would impact on the safe operation of the aerodrome and its navigational aids(relevant to section 16); ii. Birdstrike: developments which likely to attract birds, including significant areas of landscaping, significant areas of water, nature reserves, or bird sanctuaries in any part of the district (relevant to sections 18, 19 & 20); and iii. Wind turbines and solar PV schemes: potential to cause potential impact on radar and safe operation of the aerodrome (particularly in relation to Policy CC3 Renewable and Low Carbon Energy). 	<p>It is highly unlikely that any such form of development that would affect the issues set out by the airport would occur within East Herts. Where proposals would be deemed to affect the safe operation of the airport the Council would engage the expertise of the relevant stakeholders. It is not considered necessary to prepare a policy to deal with these issues. However, additional text could be added to Chapter 22 Climate Change, Policy CC3.</p>	<p>Amendment to Policy CC3</p> <p>II. ...<u>(f) the safe operation of aerodromes.</u></p>

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Crime and Security				
16.34	DES2	Developers should act on recommendations from Police and Fire and Rescue Service and be unable to use 'Secured by Design' if recommendations not acted upon.	Noted. Police and Fire and Rescue recommendations will be considered as part of any development proposal. Paragraph 16.8.2 also advises applicants to consult the Hertfordshire Constabulary Architectural Liaison Officer in order to reduce crime through design.	No amendment in response to this issue
16.35	DES2	This policy should refer to minimising light pollution.	Part II of the policy could be expanded to cover the effective use of lighting.	Amendment to Policy DES2 II. Security features should be designed in a sensitive manner which respects the overall character of the frontage and location, whilst maintaining an attractive street scene <u>and minimising light pollution</u> .
General				
16.36		There are loopholes that allow minor amendments to be made to a scheme once approved which changes the overall scheme, including affordability and mix. These should be prevented.	This is an established process of Planning. The Council needs to have a robust approach to refusing such 'minor amendments' where they alter the scheme in this way. Unfortunately, the Government have now introduced a mechanism by which applicants can bypass the local planning authority to achieve these changes where issues of viability are concerned. The policy approach taken across the Plan is considered robust enough to guide the decision-taking of such applications.	No amendment in response to this issue
16.37		Roof pitches should be reduced in order to stop additional roof spaces being constructed, thus making houses bigger and unaffordable.	There is no control over the internal use of such spaces. Only where external alterations are necessary to facilitate this use can planning intervene. It is considered that this policy approach would not be suitable due to the considerations that are necessary for each planning application.	No amendment in response to this issue
16.38		Local food production should be included in local community.	The Council supports the use of land for local food production in local communities. This can be achieved in a number of ways; through the provision of private and public outdoor space and the innovative use of	Amendment to text (para. 16.7.9) Green space for being retained, enhanced and integrated into the

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			'left-over' spaces in development schemes. Additional text could be added to section 16.7.9 on public realm and inclusive design to raise the profile of local space for food production.	design of a development scheme, <u>including the creation of space for local food production or community gardens.</u> <u>This</u> It will reinforce the quality and character of a place, increase biodiversity and deliver a wide range of health and wellbeing benefits <u>as well as foster a sense of community;</u>
16.39		If building in a floodplain could houses be built on stilts?	Policy WAT1 deals with flood risk management, including flood resilient design.	No amendment in response to this issue
16.40		Land should be available for self-builders.	Noted. The Council are unable to provide land for self-builders. The Council is monitoring the interest in self-build and will evaluate any next steps at a later stage in the development Plan.	No amendment in response to this issue