

Part 1: Issues Raised Through the Preferred Options Consultation

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Introduction				
17.1	17	A road link from East to West is desirable.	The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue, which would fall under the responsibility of the local highway authority. Hertfordshire County Council (HCC) is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes, including potential East West linkages, as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	No amendment in response to this issue
17.2	17	The Plan makes no reference to required road improvements including widening the A1(M), a link road from the A10 to the M11, a Hertford bypass, a Royston bypass and a link from the A1(M) to the M1.	Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered. Furthermore, HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	No amendment in response to this issue

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17.3	17	There needs to be consideration of parking and through traffic as part of any development. There have been no improvements to Sacombe Road following development in that area.	<p>Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.</p> <p>Policy TRA3 concerns vehicle parking provision.</p>	No amendment in response to this issue
17.4	17	The Little Hadham bypass should be turned into a dual carriageway from the M11 to the A10 with later extension to the M1.	<p>The Little Hadham bypass seeks to relieve congestion and improve the amenity of local residents in that local area. HCC, as local highway authority, is in the process of bringing forward a bypass scheme, which is intended to be constructed by 2019. Dualling of this route was considered, but ruled out during the process of developing this scheme.</p> <p>The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue, which would fall under the responsibility of the local highway authority. HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes, including potential East West linkages, as part of its remit. East Herts Council is fully engaged</p>	No amendment in response to this issue

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			with, and contributing to, this process, as appropriate.	
17.5	17	Despite development, Ware town centre has kept its character. It is hoped that this will be maintained.	Noted. Part 6 of the Vision statement on page 17 of the Preferred Options District Plan refers to the need for carefully planned development which recognises the importance of preserving and enhancing the historic character of the main towns, including Ware. Furthermore, any effects on Ware Town Centre will be taken into account in the preparation of any Masterplan for the Area to the North and East of Ware (draft Policy WARE3).	No amendment in response to this issue
17.6	17	The A414 through Hertford is already very heavily congested at peak times.	The constraints of this route are well known and investigations have been undertaken by HCC to seek to identify measures that would mitigate congestion as part of ensuring that the highway network can operate with the additional development proposed in the Plan. HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit and the A414 through Hertford is a key issue for consideration through this process. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	No amendment in response to this issue
17.7	17	Improvements to the A602 between Ware and Stevenage will only have a marginal impact on journey times.	Hertfordshire County Council, as the Highway Authority, is seeking to increase the capacity of certain junctions on the A602 in order to ease congestion at various 'pinch' points on the route between Ware and Stevenage. Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to	No amendment in response to this issue

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			understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' and consideration of the A602 forms part of this process. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	
17.8	17	The Little Hadham bypass is supported but improvements to the Bishop's Stortford bypass may be necessary along with a bypass of the town centre from the south of the town to provide an alternative route to Stansted Airport.	Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered. HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	No amendment in response to this issue
17.9	17	There is no mention of managing increased rail demand into London. The level of housing proposed is not sustainable for the current level of infrastructure. More information about Crossrail 2 is required before development takes place.	Discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail and are ongoing. These bodies will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses. Hertfordshire County Council is currently in	No amendment in response to this issue

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			<p>the process of updating its Rail Strategy which will also influence how train services can adapt to growing demand.</p> <p>Proposals for Crossrail 2 were consulted on by TfL and Network Rail in October 2015. While this consultation left the northern terminus of the route open and therefore at this stage it is not fully determined where the route would terminate, current proposals (upon which assumptions for bringing the initial scheme forward are based), show Broxbourne as the northern most station on the route. In this respect it is therefore unknown whether Crossrail 2 would eventually utilise the Hertford East branch line when fully delivered, and it should be noted that other termini have also been promoted by respondents to the recent consultation. Therefore, although it is anticipated that the core section of the route would be on stream around 2032, the peripheral route sections are not likely to be delivered within this timeframe. Therefore it is unlikely that Crossrail 2 would directly impact upon the Development Strategy for East Herts.</p>	
17.10	17	The A120 bypass needs to include Standon and Puckeridge too otherwise the bottleneck at Little Hadham will just be moved there instead.	The benefits of providing a potential bypass for Standon and Puckeridge are recognised, although it is not clear at the present time how such a scheme would be funded or delivered. Hertfordshire County Council, as the Highway Authority, took the decision in 2006 to focus on seeking to fund two separate local bypasses, with a decision to prioritise Little Hadham first. A commitment was made to	No amendment in response to this issue

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			look at options for Standon/Puckeridge once the Little Hadham bypass had been delivered and local initial consultation was undertaken by HCC between February and March 2016. Therefore, as HCC would be the responsible authority for delivering such a bypass, this issue falls outside the remit of the District Plan.	
17.11	17	There should be mention of improved travel to the North of England.	Improving travel links to other parts of the country beyond the benefits of those schemes already identified, falls outside the remit of the District Plan.	No amendment in response to this issue
17.12	17	The Highways Agency (now Highways England) indicate that it is important that sustainable transport solutions are available within any development that comes forward in the Gilston Area and that co-operation between authorities is necessary in order to ensure the development is well integrated with the existing urban area of Harlow.	Noted and agreed. Policy TRA1 (Sustainable Transport) and Policy GA1 (Land in the Gilston Area) include a requirement to make provision for different modes of sustainable transport in accordance with the Local Transport Plan and/or Hertfordshire 2050 Transport Vision. Detailed discussions with Highways England, Essex County Council, HCC, Harlow Council, passenger transport providers and other bodies are ongoing.	No amendment in response to this issue
17.13	17	The Highways Agency (now Highways England) indicate that the fact that the number of jobs proposed does not match the level of housing may result in greater levels of out commuting from East Herts, potentially resulting in greater impact on the highway network.	East Herts is a mainly rural district which, by its nature, is partly reliant on larger neighbouring urban areas to meet the employment needs of its residents, e.g. it has an historic pattern of rail commuting into London. Nevertheless, the District Plan seeks to provide for a significant number of additional jobs over the Plan period.	No amendment in response to this issue
17.14	17	The Highways Agency (now Highways England) emphasise the importance of a robust evidence base which evaluates the cumulative and individual impacts of development on road links and junctions. Any funding shortfalls for infrastructure provision should be	Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local	No amendment in response to this issue

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		<p>identified at an early stage. The work done to date does not fully determine the operation of the strategic road network following implementation of all District Plan development. It is therefore not currently known if any showstoppers exist. There is concern with the following junctions:</p> <ul style="list-style-type: none"> • M11 Junction 7 • M11 Junction 8 • M25 Junction 25 • A1(M) Junctions 3-6 	<p>highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered.</p>	
17.15	17	<p>The Highways Agency (now Highways England) is supportive of improving cycling and walking links to and from development sites and encouraging the use of public transport. However, it would be useful if the evidence base indicated how this would be achieved for each development site.</p>	<p>Support noted and welcomed. Policy TRA1 of the Preferred Options District Plan identifies the kind of sustainable transport solutions that should be provided as part of new developments. Planning Applications should be informed by this policy along with the provisions contained within the Local Transport Plan and Urban Transport Plans (where applicable). HCC is currently preparing its 'Hertfordshire 2050 Transport Vision', which will further seek to promote sustainable transport options. The detail of any site specific proposals would need to be agreed through the planning application process.</p>	No amendment in response to this issue
17.16	17	<p>HCC suggest that at Pre-Submission stage there is a requirement for outline mitigation measures to be identified including broad cost estimates, indicative delivery timescales and an identification of funding sources. HCC will assist with this and advise on the technical work that is required and provide access to existing traffic and transport data and models. HCC have provided a table which outlines the evidence that currently exists for the emerging preferred options sites as well as identifying gaps. Modelling needs to</p>	<p>Support from the County Council on this key issue is gratefully received and it is hoped that discussions will continue as work on the emerging Plan continues.</p> <p>It is acknowledged that a schedule of required infrastructure, including funding and delivery timescales will be required. This will take place through the Infrastructure Delivery Plan, work which is currently underway, and which</p>	No amendment in response to this issue

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		take account of growth in neighbouring areas.	HCC, as highway authority, is involved with. It is also noted that HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which will assist in this process. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	
17.17	17	HCC suggest that there is a risk that no viable solutions may be found in relation to online improvements on the A414 in Hertford or on the A10 and that improvements identified as part of the Welwyn Hatfield Local Plan modelling and design work may be insufficient to accommodate large scale development for both districts in the south east WGC area.	Capacity constraints relating to the A414, particularly through Hertford, are recognised. The Council has, and will continue, to work with the County Council, Welwyn Hatfield Council and other relevant bodies in order to understand the potential impacts of development on the strategic and local highway networks, and any mitigation measures that maybe required.	No amendment in response to this issue
17.18	17	HCC seek assurance that Network Rail and the train operating companies have been consulted as part of the development of the Plan. Confirmation should be sought that both station and rail infrastructure is able to cope with likely demands placed upon it in respect of the preferred development sites.	Discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail and are ongoing. These bodies will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses.	No amendment in response to this issue
17.19	17	HCC seek assurance that, in relation to bus services, development is situated in locations where there are existing services and where new services could be provided long term which would not be reliant on HCC funding.	The proximity of sites to modes of sustainable transport forms part of the site assessment process within the Sustainability Appraisal. Where new or extended bus routes are required, contributions from developers will be expected to ensure their viability in the initial years of their operation and help establish green travel patterns. Patronage would subsequently need to be of a sufficient level to ensure services are retained.	No amendment in response to this issue

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17.20	17	Essex County Council considers that the draft plan is consistent with the NPPF in terms of ensuring that developments generating significant movement are located where the need to travel will be minimised and the use of sustainable modes maximised. However the Plan should provide details on types of sustainable transport measures to be delivered.	Support noted and welcomed. Policy TRA1 of the Preferred Options District Plan identifies the kind of sustainable transport solutions that should be provided as part of new developments. Planning Applications should be informed by this policy along with the provisions contained within the Local Transport Plan and Urban Transport Plans (as appropriate). HCC is also currently preparing its 'Hertfordshire 2050 Transport Vision' which will assist in this process.	No amendment in response to this issue
17.21	17	<p>Essex County Council suggest that the chapter should include the following:</p> <ul style="list-style-type: none"> • Ensuring that emerging plans relate to existing cycle and walking networks. • Policies should promote accessibility for all • Reference should be made to car clubs, cycle storage and EV charging points • Consideration should be given to the potential for 'car free' developments if they are located close to town centres. 	<p>Policy TRA1 identifies a need to deliver sustainable transport solutions within new developments including improved pedestrian and cycling links. The policy also promotes the implementation of car sharing schemes.</p> <p>Policy TRA3 requires provision of sufficient secure, covered and waterproof cycle storage facilities. It also identifies a requirement for the provision of charging points for low and zero carbon vehicles within car parks.</p> <p>It is recognised that the NPPF seeks to promote the use of sustainable transport in order to reduce greenhouse gas emissions and congestion. Sites near town centre locations are close to services and facilities, including modes of sustainable transport, and therefore a reduced provision of car parking spaces maybe appropriate. This is reflected in the currently adopted Vehicle Parking at New Developments SPD. Vehicle parking standards have been reviewed as part of ongoing work on the District Plan and the</p>	No amendment in response to this issue

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			SPD will be updated in due course.	
17.22	17	<p>Broxbourne Borough Council suggests that there is little mention of public transport improvements including Crossrail 2. Should Crossrail 2 terminate at Broxbourne then there is concern that East Herts residents may drive and park at stations in in the Borough, adding additional pressure. There is little detail on the cumulative impact of development on the A10. Broxbourne Borough Council is willing to share the results of their own transport study once complete. The Council is keen to discuss this and other cross boundary issues through the Duty to Co-operate.</p>	<p>Proposals for Crossrail 2 were consulted on by TfL and Network Rail in October 2015. While this consultation left the northern terminus of the route open and therefore at this stage it is not fully determined where the route would terminate, current proposals (upon which assumptions for bringing the initial scheme forward are based), show Broxbourne as the northern most station on the route. The latest Crossrail 2 public consultation undertaken by TfL and Network Rail in October 2015 suggested that likely timetabling of the Greater Anglia services would make it more time efficient (and therefore more attractive) for passengers on the Hertford East branch line to transfer to Crossrail 2 at Tottenham Hale. This should reduce the numbers of passengers who would choose to travel to Broxbourne. However, as at present, there will always be an element of personal choice which may result in some passengers choosing to travel from Broxbourne.</p> <p>Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, including the A10, and any mitigation measures that may be required. HCC is currently preparing its 'Hertfordshire</p>	No amendment in response to this issue

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			<p>2050 Transport Vision' which will assist in this process.</p> <p>The confirmation of continued co-operation of Broxbourne Borough Council on this, and other strategic issues, is welcomed.</p>	
17.23	17	People will continue to travel by car rather than using public transport.	The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's dispersed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District Plan aim to facilitate a step change away from car usage, where sustainable travel choices exist.	No amendment in response to this issue
17.24	17.1	New development will add significant traffic to a road system that is already gridlocked.	While constraints on the road network lead to congestion hotspots in some locations in the district, especially at peak times, no area in East Herts would be classified by the highway authority as being 'gridlocked' on a regular basis as traffic does keep moving, albeit at a slower rate. Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when specific schemes will be delivered. HCC is also currently preparing its 'Hertfordshire 2050 Transport Vision' which will assist in this	No amendment in response to this issue

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			process.	
17.25	17.1	The chapter does not discuss relationships between transport and development. It does not consider the role of access in supporting development aims, especially in terms of economic and social features. Aims might include provision of quality pedestrian links to very local shops and community facilities or of bus services to local and town centres. Policy TRA1 does refer in I.(d) to “..easy and direct access to key services and facilities ...” but only “... where possible ...”.	Agreed in part. While it is considered that these relationships are implicit throughout the Plan, additional text to the end of 17.1.6 (now 17.1.7) could strengthen the wording. In terms of Policy TRA1 it is agreed that ‘possible’ may be open to misinterpretation. The policy is designed to ensure that only in cases where the provision of ‘easy and direct access to key services and facilities’ would not be achievable e.g. due to matters such as insurmountable physical constraints, would this part of the criteria not apply. Therefore ‘possible’ should be replaced with ‘feasible’ to strengthen policy wording.	<p>Amendment to text (Para 17.1.67) Additional wording to end of paragraph:</p> <p><u>This approach can aid the local economy by supporting local services and facilities. Concentrating development in sustainable locations can also help benefit the wider economy via a reduction in congestion caused by additional generated trips over those occasioned by a more widely disbursed development pattern.</u></p> <p>Amendment to policy (TRA1 (d))</p> <p>(d) Prioritise the provision of modes of transport other than the car (particularly walking, cycling and, where appropriate, passenger transport) both within well connected site layouts and, where possible <u>feasible</u>, providing easy and direct access to key services and facilities;</p>

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17.26	17.1	In addition to personal travel, provision needs to be made for movement of goods and materials. Even in residential areas, delivery and service vehicles generally form an important element of traffic.	The development management process ensures that the highway authority is satisfied with the access arrangements of any new development to ensure that it is suitable in such respects e.g. refuse vehicles. It is not considered necessary to include additional text on this point.	No amendment in response to this issue
17.27	17.1	To be fully effective, transport policies need to be reflected in design and priority principles set out for other topic areas, such as Employment, Retail and Design.	The District Plan is intended to be read as a whole and, as sustainable development is fundamentally intrinsic to the strategy, it is not considered that it would benefit from repetition.	No amendment in response to this issue
17.28	17.1.2	Criticism of the Local Transport Plan.	LTP3 is an adopted document produced by HCC and is not the subject of consultation at this stage. However, HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is intended to replace LTP3.	No amendment in response to this issue
	17.1.2	East- west travel difficulties highlighted.	The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue, which would fall under the responsibility of the local highway authority. HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering East-West travel as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	No amendment in response to this issue
17.29	17.1.2	Impact of the A120 improvement through by-passing Hadham adds to the speeding and other pressures at Standon.	The issue is beyond the scope of this Plan and would fall under the responsibility of the local highway authority to address in conjunction with its proposals for the Little Hadham Bypass. However, it should be noted commitment was made by HCC to look	No amendment in response to this issue

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			at options for Standon/Puckeridge once the Little Hadham bypass had been delivered and local initial consultation was undertaken by HCC between February and March 2016.	
17.30	17.1.2	Rerouting sought for A414 through Hertford	While the constraints of this route are well known and investigations are being undertaken by HCC to seek to mitigate congestion as part of ensuring that the highway network can operate with the additional development proposed in the Plan, there are no current plans for a bypass of Hertford. The issue is beyond the scope of this Plan and would fall under the responsibility of the local highway authority. However, it should be noted that HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit and the A414 through Hertford is a key issue for consideration through this process. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	No amendment in response to this issue
17.31	17.1.3	Criticism of the Hertford and Ware Urban Transport Plan which is considered out of date. No transport infrastructure is being delivered to support development, for instance at the development North of Hertford.	The Hertford and Ware Urban Transport Plan is an adopted document produced by HCC and is not the subject of consultation at this stage. Detailed transport modelling work is currently ongoing with HCC, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which	No amendment in response to this issue

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			will include information on how and when specific schemes will be delivered. HCC is also currently preparing its 'Hertfordshire 2050 Transport Vision' which will assist in this process.	
17.32	17.1.3	More needs to be done to encourage walking and cycling than is proposed by the Hertford and Ware Urban Transport Plan.	<p>The Hertford and Ware Urban Transport Plan is an adopted document produced by HCC and is not the subject of consultation at this stage.</p> <p>The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's dispersed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District Plan aim to facilitate a step change away from car usage, particularly through the provision of enhanced walking and cycling links, as required by Policy TRA1.</p> <p>HCC is also currently preparing its 'Hertfordshire 2050 Transport Vision' which will assist in this process.</p>	No amendment in response to this issue
17.33	17.1.4	The Council is planning for new development but is powerless to make any significant improvement to major transport bottlenecks.	Detailed transport modelling work is currently ongoing, working with neighbouring authorities where appropriate, in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Any infrastructure requirements will be identified within the Infrastructure Delivery Plan which will include information on how and when	No amendment in response to this issue

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			specific schemes will be delivered. It should also be noted that HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering the potential need for strategic mitigation schemes as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.	
17.34	17.1.5	Buntingford could be relatively easily re-connected to the railway network. Network Rail should add more track capacity on the line to Liverpool Street.	<p>Discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail. These are ongoing and they will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses.</p> <p>The issue of re-connecting Buntingford to the railway network falls outside of the scope of the District Plan and would be unlikely to be delivered within the plan period.</p> <p>The need for additional capacity on the Liverpool Street line has been highlighted through several mechanisms and the four-tracking of the line between the Tottenham Hale and Broxbourne areas has been included in Network Rail's recently published Anglia Route Study, March 2016: http://www.networkrail.co.uk/Anglia-Route-Study.pdf. This currently anticipates potential commencement within Control Period 6 (i.e. between 2019-2024).</p>	No amendment in response to this issue
17.35	17.1.5 (now 17.1.6)	More needs to be done to encourage walking and cycling than is proposed by the Hertford and Ware Urban Transport Plan.	The Hertford and Ware Urban Transport Plan is an adopted document produced by HCC and is not the subject of consultation at this stage.	No amendment in response to this issue

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			<p>The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's dispersed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District Plan aim to facilitate a step change away from car usage, particularly through the provision of enhanced walking and cycling links, as required by Policy TRA1.</p> <p>HCC is also currently preparing its 'Hertfordshire 2050 Transport Vision' which will assist in this process.</p>	
17.36	17.1.6 (now 17.1.7)	General support	Support noted and welcomed.	No amendment in response to this issue
17.37	17.1.7 (now 17.1.8)	It is totally unrealistic to reduce car dependence.	The NPPF requires that transport policies in local plans should seek to balance the transport system in favour of sustainable transport modes. While it is recognised that the district's dispersed settlement pattern will result in a certain level of car borne traffic, the policies contained in the emerging District Plan aim to facilitate a step change away from car usage.	No amendment in response to this issue
Sustainable Transport				
17.38	17.2	The Plan should identify a web of footpaths, crossings, bus stops and cycleways to which developments can make a connection. Sites must link adequately to existing developments and town centres.	Policy TRA1 (C) identifies the need to ensure that a range of sustainable transport options are available, including through the improvement of, or extension to, existing links, paths and routes. This detailed issue	No amendment in response to this issue

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			would be agreed through the planning application process.	
17.39	17.2.2	The sentence is weak and should not say 'where possible'. Sustainable transport infrastructure must be built.	Agreed that the wording of the sentence could be made stronger.	Amendment to text (Para 17.2.2): Therefore, where possible , strong emphasis will be placed on seeking the provision of new bus, cycle and pedestrian transport routes and networks in addition to extending and strengthening existing provision.
17.40	Policy TRA1	The Canal and River Trust supports the use of towpaths as sustainable transport routes. Contributions should be sought to achieve improvements to sustainable transport infrastructure. It is hoped that the policy is not only seeking provision of new infrastructure where moorings might be created. It is not considered necessary for the policy to make the link between provision of moorings and towpath improvement.	Support noted and welcomed. Contributions to all forms of transport infrastructure from new developments are currently sought, where appropriate, on the basis of Hertfordshire County Council's Toolkit. The policy seeks the provision of new and improved pedestrian and cycle links, and where appropriate, new moorings. Provision of moorings in suitable locations may help to reduce car usage and give people greater choice about how they travel, in accordance with Paragraph 29 of the NPPF.	No amendment in response to this issue
17.41	Policy TRA1	The removal of car parking in towns will not lead to healthy town centres. Such policies will cause people to drive further away to areas where there is adequate parking (Welwyn) or a good park and ride service (Cambridge) or out of town centres (Brookfield).	The policies contained in the emerging District Plan do not propose to reduce the number of public car parking spaces in town centres, but seek to improve sustainable transport links in order to help secure a step change away from car usage.	No amendment in response to this issue
17.42	Policy TRA1	The policy throws together walking, cycling and public transport without defining the different characteristics of each. There should be a policy for each.	Policy TRA1 seeks to encourage a modal shift away from car use by improving provision and access to sustainable modes of transport in	No amendment in response to this issue

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			accordance with Paragraph 29 of the NPPF. It is recognised that different modes of transport have different characteristics and requirements and these details would be addressed at the planning application stage.	
17.43	Policy TRA1	The policy should not include elements relating to service provision such as car sharing and bus engine types. They should be included within an appendix or separate document which can be updated.	It is considered that elements such as car sharing and bus engine types should be contained within policy in order to ensure that these aims are given the strongest possible weight during the planning application process. However, it is considered that criterion III would be best placed within Policy EQ4 of the Environmental Quality Chapter.	No amendment in response to this issue <u>Criterion III to be moved to sit within Policy EQ4.</u>
17.44	Policy TRA1	A new town could have all required infrastructure in place, including a new rail link.	The option of developing a new settlement in the District was assessed alongside all other development strategy options as part of the preparation of the Preferred Options District Plan. While pursuing this option could provide the critical mass of development required to deliver significant infrastructure projects, it was considered that, overall, such a strategy would be less sustainable than other options and would be unlikely to be delivered within the plan period.	No amendment in response to this issue
17.45	Policy TRA1	The Council should engage with train companies to ensure that housing is supported by improved services. Bus services also need to be improved and better walking and cycling routes provided. People will only reduce car usage if there are suitable public transport alternatives.	Discussions have taken place during the plan making process with the relevant bus companies, Train Operating Companies and Network Rail. These are ongoing and they will continue to have an opportunity to respond to emerging development proposals as work on the District Plan progresses. Policy TRA1 requires the provision of new and improved pedestrian and cycling routes in order to help deliver a modal shift away from car use in accordance with the NPPF.	No amendment in response to this issue

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17.46	Policy TRA1	HCC have offered a number of comments identifying the type of mitigation measures that may be required for sites included within the draft District Plan.	Noted. The Council has continued its co-operation with the County Council and other partners in order to understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. Where mitigation measures have been identified on a site-specific basis, these will be captured within the relevant policies within the settlement chapters. It is also to be noted HCC is also currently preparing its 'Hertfordshire 2050 Transport Vision' which will assist in this process, especially where specific measures have yet to be fully determined.	No amendment in response to this issue
17.47	Policy TRA1	Routes should be safeguarded for new east/west transport routes such as guided bus routes, light rail and cycle routes.	<p>The limitations of existing east-west travel are acknowledged and this matter was raised in the Issues and Options consultation document; however, it is beyond the scope of this Plan to seek a solution to this long-standing issue.</p> <p>It should be noted that HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering East-West travel as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.</p>	No amendment in response to this issue
17.48	Policy TRA1	Sufficient parking provision should be made at new developments. If not, double yellow lines should be used to stop parking on the street.	Vehicle parking standards have been reviewed as part of ongoing work on the District Plan to ensure that appropriate provision is made and the current Vehicle Parking at New Developments SPD will therefore be updated accordingly in due course.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			Parking enforcement lies outside of the scope of the District Plan.	
17.49	Policy TRA1	Providing better access to the countryside is supported. Many public rights of way are poorly maintained or are blocked.	Noted. A new section and policy regarding Public Rights of Way is to be inserted into Chapter 18 'Community Facilities, Leisure and Recreation'.	No amendment to Chapter 17 in response to this issue
Highway Safety and Trip Generation				
17.50	Policy TRA2	This policy is addressed to vehicle use and provision. There is no policy on overall networks and priority criteria, within new developments or more widely.	Policy TRA1 clear emphasises prioritisation of sustainable transport modes. However, it is important to note that responsibility for wider route networks and development standards in relation to access etc lie with HCC as highway authority and reference to the Local Transport Plan and daughter documents, which contain the strategic framework, has been made in this chapter. The emerging District Plan does not seek to duplicate the role of that authority, so while Policy TRA2 sets out the general criteria by which any application would be considered, the more technical requirements attached to the Development Management process are beyond the scope of the District Plan.	No amendment in response to this issue
Vehicle Parking Provision				
17.51	17.4.1	If the amount of parking is restricted, it is essential that people don't park their cars on streets instead.	Vehicle parking standards have been reviewed as part of ongoing work on the District Plan and the current Vehicle Parking at New Developments SPD will therefore be updated accordingly in due course. In the consideration of planning applications, the Council pays particular attention to ensuring	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			<p>that the impact that the level of parking provision associated with new development may have on a surrounding area, is appropriately mitigated.</p> <p>Parking enforcement lies outside of the scope of the District Plan but, where there is a specific identifiable concern, development proposals are able to include appropriate measures, e.g. Residents Parking Zones, which can influence motorists' parking choices.</p>	
17.52	Policy TRA3	Policy should include support for provision of adequate cycle storage for existing as well as new development.	While it is not possible for the District Plan to address deficiencies in existing development, Policy TRA3 Part II identifies a need to provide sufficient secure, covered and waterproof cycle storage facilities.	No amendment in response to this issue
17.53	Policy TRA3	Policy should include wording to prevent the loss of front gardens for the purpose of car parking which has a detrimental impact on the public realm.	While the issue is noted, the conversion of front gardens to facilitate additional parking provision is usually carried out under permitted development rights, as long as a porous material is used.	No amendment in response to this issue
17.54	Policy TRA3	Aston Parish Council considers that the Plan should include a policy concerning parking in residential areas. Any such policy should take account of the impact of new development on existing parking, for instance knocking down a garage block to build new houses.	Vehicle parking standards have been reviewed as part of ongoing work on the District Plan and the current Vehicle Parking at New Developments SPD, which provides more detailed guidance than is appropriate in the District Plan, will be updated accordingly in due course.	No amendment in response to this issue
17.55	Policy TRA3	Buntingford Town Council, Bishop's Stortford Town Council, Buckland and Chipping Parish Council and other local bodies state that the Vehicle Parking SPD should be updated and should quote minimum standards not maximum. The SPD should recognise	Vehicle parking standards have been reviewed as part of ongoing work on the District Plan and the current Vehicle Parking at New Developments SPD will therefore be updated accordingly in due course.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		that areas with poor public transport links have a higher reliance on the motor vehicle. The SPD should also have more of a focus on design in relation to garage sizes and parking courts.		

Part 2: Other Proposed Amendments

Policy/ Paragraph Number	Issue	Proposed Amendment
Paragraph 17.1.3	HCC is currently in the process of updating its Transport Planning Framework. Part of this involves the cessation of the Urban Transport Plan (UTP) programme. The introduction of Growth & Transport Plans is planned to replace UTPs in areas of economic growth. These changes necessitate the amendment of text.	Amendment to text (para. 17.1.3) Although the LTP identifies some specific schemes for implementation in the district, the majority of transport schemes are <u>have been</u> identified through a rolling programme of Urban Transport Plans (UTPs) which identify how and where the strategic objectives and targets detailed in the county-wide LTP can be delivered at a local level. There are two <u>is one adopted</u> UTPs affecting East Herts; the Hertford and Ware Urban Transport Plan (HCC, November 2010), and the emerging Bishop's Stortford and Sawbridgeworth Urban Transport Plan. <u>For areas where significant development is planned or anticipated, HCC is in the process of introducing Growth & Transport Plans, to ensure that appropriate transport infrastructure (including optimal packages of measures) is identified and also that they be used to help to inform future potential major transport scheme decisions.</u>
New Paragraph 17.1.4	As HCC intends to replace LTP3 with its emerging Hertfordshire 2050 Transport Vision which will reflect its changing emphasis towards supporting and unlocking growth, this should be reflected by the insertion of relevant text.	Amendment to text (para. 17.1.4) <u>HCC is currently updating the County's transport planning framework to ensure that the transport network is able to support and unlock growth and is in the process of replacing LTP3 with a 'Hertfordshire 2050 Transport Vision'. This strategic plan for transport infrastructure will, when adopted, underpin major investment proposals in Hertfordshire's transport infrastructure.</u>
New Paragraph 17.1.9	Although the District Plan focuses on sustainable transport, in order to acknowledge that additional key road-based infrastructure may be required to support development, this should be reflected by the insertion of additional text.	Amendment to text (para. 17.1.9) <u>Likewise, it should also be acknowledged that, in order to help mitigate the impact of development, the delivery of additional key road-based infrastructure measures may be necessary in certain situations to enable strategic growth in the district to occur. Key infrastructure requirements to enable delivery of the Plan are set out in Chapter 3, The Development Strategy.</u>
Paragraph 17.2.2	Additional wording required to allow the inclusion of community-led transport schemes.	Amendment to text (para. 17.2.2) Therefore, strong emphasis will be placed on seeking the provision of new bus, cycle and

		pedestrian transport routes and networks in addition to extending and strengthening existing provision, <u>including through supporting community-led transport schemes.</u>
Policy TRA1	Criterion I. (b) To reflect emergence of HCC's 'Hertfordshire 2050 Transport Vision', additional text required to supplement reference to the Local Transport Plan.	Amendment to policy (Policy TRA1) (b) Comply with the provisions of the Local Transport Plan <u>and/or Hertfordshire 2050 Transport Vision</u> ;
Policy TRA1	Criterion I. (c) 1. To ensure that 'sustainable' rather than any type of potential transport options are available, wording strengthened; 2. Additional text required to allow for the inclusion of community transport initiatives; 3. Minor grammatical improvement to criterion.	Amendment to policy (Policy TRA1) (c) Ensure that a range of alternative <u>sustainable</u> transport options are available to occupants or users, which may involve the improvement of pedestrian links, cycle paths, and passenger transport network (including bus and/or rail facilities) <u>and community transport initiatives</u> . These improvements could include the creation of new routes, services and facilities or extensions to existing infrastructure and which could also <u>may</u> incorporate off-site mitigation, as appropriate. In suitable cases the provision of footways and cycle paths alongside navigable waterways may be sought, along with new moorings, where appropriate. The implementation of car sharing schemes should also be considered;
Policy TRA1	Criterion I. (d) Minor amendments considered appropriate for clarification and to improve grammar of the policy.	Amendment to policy (Policy TRA1) (d) <u>Ensure that site layouts p</u> Prioritise the provision of modes of transport other than the car (particularly walking, cycling and, where appropriate, passenger transport) both within well connected site layouts and <u>which</u> , where feasible, providing <u>should provide</u> easy and direct access to key services and facilities;
Policy TRA1	Criterion I. (f) To reflect the need to protect all existing routes, minor amendments considered appropriate.	Amendment to policy (Policy TRA1) (f) Protect existing rights of way, cycling and equestrian routes (including <u>both</u> designated <u>and non-designated</u> routes and, where there is evidence of regular public usage, informal provision) and, should diversion prove unavoidable, provide <u>suitable, appealing</u> replacement alternative appealing routes to equal or enhanced standards; and
Policy TRA1	Criterion II. To reflect emergence of HCC's 'Hertfordshire 2050 Transport Vision', additional text required to supplement reference to the Local Transport Plan	Amendment to policy (Policy TRA1) Where appropriate, contributions may be required towards the facilitation of strategic transportation schemes identified in the Local Transport Plan <u>and/or Hertfordshire 2050 Transport Vision</u> and other related strategies.
Section 17.3	Renaming of title considered necessary to better describe section contents.	Amendment to text (para. 17.3) Highway Safety and Trip Generation <u>Safe and Suitable Highway Access Arrangements and Mitigation</u>
Paragraph 17.3.1	To ensure that it is made explicit that the onus will be on developers to demonstrate that transport provision associated with development proposals	Amendment to text (para. 17.3.1) In designing new developments it is important that proposed access arrangements are both safe for users and suitable for the type of development and number of users proposed and

	are appropriate, further wording has been added to the end of the paragraph.	trips predicted to be generated. Where additional trips are predicted from a site it is necessary to ensure that measures can commensurately mitigate the impact where possible. <u>and While</u> the NPPF is clear that “development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe” (Paragraph 32, NPPF, CLG, 2012), <u>developers should be able to demonstrate that transport provision associated with development proposals will be appropriate, both in terms of modal choice and the capacity of the highway network to accommodate additional trips.</u>
Policy TRA2	Renaming of title considered necessary to better describe policy contents.	Amendment to policy (Policy TRA2) Highway Safety and Trip Generation <u>Safe and Suitable Highway Access Arrangements and Mitigation</u>
Policy TRA2	To more accurately reflect that the development proposals should apply to users of the site rather than all people, amended text considered necessary.	Amendment to policy (Policy TRA2) Development proposals should ensure that safe and suitable access can be achieved for all people <u>users</u> . Site layouts, access proposals and any measures designed to mitigate trip generation produced by the development should: (a) Be acceptable in highway safety terms; (b) Not result in any severe residual cumulative impact; and (c) Not have a significant detrimental effect on the character of the local environment.
Policy TRA2	Numbering inconsistency – two (b)’s.	Amendment to policy (Policy TRA2) Replace second (b) with (c).
Paragraph 17.4.3	To reflect the fact that vehicle parking standards have been reviewed as part of ongoing work on the District Plan and the current Vehicle Parking at New Developments SPD will therefore be updated, additional wording has been added to the end of the paragraph.	Amendment to text (para. 17.4.3) The Council’s Supplementary Planning Document ‘Vehicle Parking Provision at New Development’ sets out the amount of parking spaces that should be provided in association with development and also offers guidance concerning the design and layout of such provision. <u>Amended parking standards, to replace those contained within the 2008 ‘Vehicle Parking Provision at New Development’, are included at Appendix X to the District Plan and a revised Vehicle Parking Supplementary Planning Document is to be prepared, which will include updated guidance on design issues.</u>