

Issue Number	Issue	Officer Response
General		
7.01	Information about infrastructure provision, such as health, education, sewage, transport and retail facilities is not sufficient and is less detailed than that given for Ware. It is not clear how such services will be delivered.	<p><b>No amendment to Plan in response to this issue</b></p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.02	Traffic is extremely bad in Hertford at present and these proposals will only make the situation worse. The historic nature of the town centre means that roads are already at capacity. Hertford Town Council believes that transport issues have not been adequately addressed within the plan. There is already significant pressure on the A414 through the town and a bypass of the town is required. HCC notes that modelling shows that the A414 is already operating close to capacity and that this is a potential constraint on growth. Further work is required to explore mitigation measures. A clearer understanding of this is required as work on the plan progresses.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Detailed transport modelling work is currently on-going, largely under the auspices of HCC working with other neighbouring local authorities, Highways England, and site promoters, 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. The constraints of the A414 are well known, and the Council will therefore continue to work with HCC, which has already carried out a Hertford A414 specific study, to seek to mitigate congestion as part of ensuring that the highway network can operate effectively with the additional development proposed in the Plan. Hertfordshire County Council (HCC) is also 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.</p> <p>Furthermore, each of the proposed housing allocation policies identify a need to include sustainable transport measures including encouraging walking and cycling and enhancing passenger transport services to reduce car dependency and encourage modal shift. More detail on sustainable transport initiatives is provided by Policy TRA1 Sustainable Transport. An Infrastructure Delivery Plan is currently being prepared which will identify any specific infrastructure requirements and will include information on how and when such schemes will be delivered.</p>
7.03	There is no reference made to improving the frequency and speed of train services. The capacity of the two train lines to cope with extra demand should be examined.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While the ability to directly affect service provision is beyond the scope of the Plan, 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. Furthermore, when consultations regarding rail services affecting the district take place, the Council actively responds seeking to achieve improved service provision.</p>

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		Hertfordshire County Council is also currently in the process of updating its Rail Strategy which will also influence how train services can adapt to growing demand.
7.04	Education is an issue and extra provision needs to be made in the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While primary education provision in Hertford was an issue at the time of consultation in 2014, the situation has been significantly improved by Simon Balle School becoming an ‘all through’ facility from September 2015. This has relieved pressure on other primary education facilities in the town. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period.</p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.05	The proposed development needs to be more spread out around the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposed allocated sites involve dispersed development in both a central location (Mead Lane) and in three peripheral areas to the north, south and west. It is considered that this would achieve a spread of development throughout the town. Moreover, other non-allocated sites within the settlement boundaries are also likely to deliver further locational choice throughout the plan period.</p>
7.06	Development should be focused on brownfield land in order to avoid reducing the amount of Green Belt.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft District Plan includes a series of ‘Guiding Principles’ one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council’s past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. A certain amount of development on current Green Belt land is therefore required to ensure that East Herts is able to meet its identified needs.</p>
7.07	Cycling is very difficult in the town due to the narrow streets and there is a conflict with car users	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is recognised that making suitable provision for cyclists in the town centre is problematic, largely due to the historic nature of the street layout. However, working with HCC and other key stakeholders, there may be opportunities to provide better linkages for both pedestrians and cyclists to the town centre from other parts of the town and the need to achieve this is identified in Policy TRA1. In addition to the measures contained in the Hertford and Ware Urban Transport Plan and the overarching Local Transport Plan, the Hertford Town Centre Urban Design Strategy also proposes improvements for cyclists. Furthermore, Hertfordshire County Council (HCC) is also currently preparing its ‘Hertfordshire 2050</p>

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		Transport Vision' which is considering the encouragement of sustainable transport modes, as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.
7.08	Hertford Town Council stresses the importance of having infrastructure work in place prior to development taking place.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is fully aware that, in order to ensure the delivery of sites within the Plan, any necessary mitigating infrastructure must be identified and provided at the most appropriate time in the development process. The District Plan should therefore seek to provide a suitable balance between conveying the requirement for infrastructure to be phased appropriately, without introducing unrealistic expectations about advance provision. Consequently, infrastructure delivery may not always be achieved prior to the commencement of development.</p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.09	Hertford Town Council considers that less flats need to be provided within the town and more high quality, low density housing. There needs to be an emphasis on high quality design.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy HOU1 of the draft District Plan indicates that an appropriate mix of housing tenures, types and sizes will be required in accordance with the latest Strategic Housing Market Assessment (SHMA). In addition, Policy DES3 Design of Development seeks to ensure that new developments embrace a high standard of design and layout to reflect and promote local distinctiveness.</p>
7.10	Hertford Town Council considers that the strategy does protect the town. The protection of the Green Fingers and the historic town centre is supported.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed.</p>
7.11	Less development is to be directed to Hertford than other settlements in the District. There are other areas on the edge of the town which could be used for development, including a number of nearby villages.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Brownfield opportunities in Hertford have been largely exhausted, due to the success of the Council's approach in past adopted local plans. As the areas on the edge of the town beyond those already identified for development in the Plan are particularly constrained, and matters are further compounded by congestion and air quality issues on the A414, this limits the amount of development that can be accommodated in Hertford and will therefore need to be provided elsewhere in the district.</p> <p>However, in terms of the suggested approach to locate some of Hertford's development towards nearby villages, it should be noted that the development strategy already provides for development within villages appropriate to their size and scale. To allocate further dwellings to the villages would not be considered to provide a suitable sustainable alternative to the proposed allocated sites which have good access to existing local schools</p>

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		and services.
7.12	There is little mention of promoting environmental enhancement such as Green Infrastructure initiatives.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The provision of existing green infrastructure initiatives is a key aspect of the draft District Plan and Policy NE4 Green Infrastructure, sets the context in relation to development throughout the district. As the Plan should be read as a whole, there is no need to repeat text on settlement basis unless specific circumstances apply. With regard to Hertford, each of the proposed housing allocation policies in the Plan identify a need for the provision of quality local green infrastructure on site. Moreover, development to the West of Hertford (Policy HERT3) will further be expected to deliver financial contributions towards the furtherance of the Panshanger Country Park initiative, which provides a significant recreational resource for local residents.</p>
7.13	HCC have submitted details of the educational requirements arising from the proposed development in Hertford.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council has continued to work with HCC's Education Team to ensure that the educational needs of current and future residents can be met throughout the plan period.</p>
7.14	Why is there so little development proposed South of the A414. There are schools available and traffic commuting to London would not have to travel through the centre of Hertford.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Due to the issues discussed in Section 4.6.5 of the Strategy Supporting Document, including the many significant infrastructure, agricultural, natural and historic assets and coalescence constraints in the area to the south of Hertford, this resulted in the majority of the area (with the exception of a small area in Mangrove Road) failing the Sieve 1 stage and not being carried forward for further assessment in later stages of the plan making process.</p>
7.15	Provision should be made for low energy/zero carbon self-builders.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Sustainable building methods and self-build issues are not confined to Hertford and are covered by other policies in the draft Plan in the Climate Change and Housing chapters.</p>
7.16	Hertford has seen major infill development in recent years and it must be recognised Hertford has reached its population limit.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The National Planning Policy Framework (NPPF) states at paragraph 47 that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. In this respect it is incumbent on the Council to ensure that the needs of the district are met. While recognised constraints limit the scope for provision in Hertford, the locations identified in the draft Plan provide sustainable sites which are considered appropriate to contribute towards delivering dwellings to address the district's identified housing need.</p>
7.17	Hertford's proposed housing allocation fails to meet the needs of the town. Additional housing sites need to be found.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Brownfield opportunities in Hertford have been largely exhausted, due to the success of the Council's approach in past adopted local plans. As the areas on the edge of the town</p>

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		beyond those already identified for development in the Plan are particularly constrained, and matters are further compounded by congestion and air quality issues on the A414, this limits the amount of development that can be accommodated in Hertford and will therefore need to be provided elsewhere in the district.
7.18	Reference to the Green Fingers is supported. There should be a clear statement to say that there will be no development on the Green Fingers other than in exceptional circumstances.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Hertford's Green Fingers have been designated as Local Green Space under the auspices of Policy CFLR2. This designation provides protection for these valuable resources and ensures that development will not be allowed in these locations, other than in very special circumstances.</p>
7.19	Traffic in the town is already heavily congested. Through traffic needs to be removed from the town centre in order to enhance the character of the town. There is no strategy for encouraging people to use forms of transport other than the car. In addition, congestion seems to be at its highest level during school term time, is there any scope for school transport policies (walking buses/car shares)?	<p><b>No amendment to Plan in response to this issue</b></p> <p>The traffic constraints of Hertford are well known, and detailed transport modelling work under the auspices of HCC, is on-going in order to fully understand the potential impact of development on both the strategic and local highway networks, and any mitigation measures that may be required. The constraints of the A414 in particular are well known, and the Council will therefore continue to work with HCC, (which has already carried out a Hertford A414 specific study), to seek to mitigate congestion as part of ensuring that the highway network can operate effectively with the additional development proposed in the Plan.</p> <p>Hertfordshire County Council (HCC) is also 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.</p> <p>In respect of term-time traffic, Hertfordshire County Council's Safe and Sustainable Journeys in Schools team work with schools, countywide, to encourage children and young people and their parents and carers to travel to school using active and sustainable modes. Further information on these initiatives can be found at:</p> <p><a href="http://www.hertsdirect.org/services/transtreets/schtravel/">http://www.hertsdirect.org/services/transtreets/schtravel/</a></p> <p>It should also be noted that traffic levels not only drop outside of term time because of school travel, but also because many of those parents (who would usually make employment trips) take time off during school holidays to be with their offspring and there is thus less traffic on the roads at such times.</p>
7.20	The mitigation measures should be specified and should be in place before development takes place. The way in which these measures would be funded should also be identified.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council is fully aware that, in order to ensure the delivery of sites within the Plan, any necessary mitigating infrastructure must be identified and provided at the most appropriate time in the development process. The District Plan should therefore seek to provide a suitable balance between conveying the requirement for infrastructure to be phased</p>

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		appropriately, without introducing unrealistic expectations about advance provision. Consequently, infrastructure delivery may not always be achieved prior to the commencement of development. An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.
7.21	There are a number of industrial areas adjacent to the river that are currently empty and unsightly. Existing businesses could be consolidated into a smaller area, thereby freeing up some space for housing development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy HERT2 relates to the Mead Lane area which lies adjacent to the River Lea. The adopted Mead Lane Urban Design Framework, December 2014, (UDF) seeks to provide a framework for the redevelopment of this area. A key aspect of the Framework is to protect existing employment space where possible, and to provide new high quality units through new development. In order to help achieve this, it is acknowledged that some residential development is required on unused parts of the area, some of which has already been delivered in recent years. The implementation of the proposals contained within the UDF will result in a significant enhancement to the character and environment of this part of Hertford.</p>
7.22	There should be an emphasis on using all brownfield sites before Green Belt is released. For instance the Hertford Marquee building in Railway Street and Caxton Hill industrial estate could be used.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft District Plan includes a series of ‘Guiding Principles’ one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council’s past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. A certain amount of development on current Green Belt land is therefore required to ensure that East Herts is able to meet its identified needs.</p> <p>In respect of Caxton Hill, the Council’s latest technical evidence base concludes that “In the light of the significant reduction of employment floorspace over recent years, and the fact that there is very limited supply of available space, Wessex Economics would recommend that EHDC seek to prevent further loss of employment land in Hertford and Ware in the short to medium term”.</p> <p>The use of the Marquee was examined as part of the Hertford Town Centre Urban Design Strategy and planning permission for conversion to a gymnasium is currently being implemented.</p>
7.23	Concern over the additional air pollution caused by more traffic.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Each of the proposed housing allocation policies identify a need to include sustainable transport measures including encouraging walking and cycling and enhancing passenger transport services, which should help mitigate trip generation. More detail on sustainable</p>

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		transport initiatives is provided by Policy TRA1. Importantly, Policy EQ4 Air Quality provides criteria that development proposals should comply with to help mitigate the effects of emissions.
7.24	There should be an underpass under Hertford or a bypass to the south of the town in order to relieve congestion in the town centre.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The constraints of traffic in Hertford are well known and investigations have been undertaken by HCC to seek to identify measures that would mitigate congestion on the A414 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.</p>
7.25	Hertford Civic Society states that more should be done to address the imbalance between housing and employment provision and the trend for Hertford residents to commute elsewhere.	<p><b>No amendment to Plan in response to this issue</b></p> <p>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. However, the SHMA has considered the relationship between housing and the need to plan for additional employment opportunities and, accordingly, the District Plan seeks to balance the need for homes and jobs over the Plan period.</p>
7.26	Hertford Civic Society believes that there should be greater provision of affordable housing, family homes and sheltered housing for the elderly.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The need for a mix of accommodation types across the District is acknowledged and the Housing Chapter includes policies to address this.</p>
7.27	Hertford Civic Society is concerned about the impact of additional development on the A414 and the fact that the plan does not contain proposals for alleviating this pressure.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The constraints of traffic in Hertford are well known and investigations have been undertaken by HCC to seek to identify measures that would mitigate congestion on the A414 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.</p> <p>Also, an Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.28	Development at the proposed scale would impact on the historic character of the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The constraints that exist in Hertford, including the need to maintain its historic character, have been considered as part of the plan making process. It is considered that the level of</p>

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		development proposed strikes an appropriate balance between providing for the housing needs of the town while recognising the importance of maintaining the character of Hertford.
7.29	Building on the Green Belt should be avoided. More value should be put on the countryside in order to ensure that the area does not turn into urban sprawl.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft District Plan includes a series of ‘Guiding Principles’ one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council’s past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. A certain amount of development on current Green Belt land is therefore required to ensure that East Herts is able to meet its identified needs. However, the need to protect the countryside from encroachment has been considered through the plan making process, in the context of needing to provide for housing needs of the District, and the current proposals are considered to offer the best approach in balancing both aspects.</p>
7.30	Infrastructure delivery needs to be properly planned for and not an afterthought.	<p><b>No amendment to Plan in response to this issue</b></p> <p>An Infrastructure Delivery Plan (IDP) is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. The IDP is being prepared with significant input from infrastructure and service providers in order to ensure that it is robust and deliverable.</p>
7.31	Green Belt land should be protected. There are no statistics presented which demonstrate a growing population that would justify significant housing growth.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft District Plan includes a series of ‘Guiding Principles’ one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council’s past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. A certain amount of development on current Green Belt land is therefore required to ensure that East Herts is able to meet its identified needs. However, the need to protect the countryside from encroachment has been considered through the plan making process, in the context of needing to provide for housing needs of the District.</p> <p>The Strategic Housing Market Assessment (SHMA) presents that evidence on which the housing target contained in the emerging District Plan is based.</p>
7.32	The recent development of 97 properties at Sacombe Road has caused parking problems. The visual amenity of the site is untidy as a hedgerow screening the properties has been removed and there is a lack of suitable arrangements for storage bins.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan is concerned with future development and therefore does not seek to comment on previous development schemes, however, the Council’s Vehicle Parking Standards have been revised since the Preferred Options consultation took place, which will influence the amount of parking provided at new development in the future. It is important</p>



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		that adequate parking provision is made to avoid displacement parking, while providing the opportunities for sustainable travel options to encourage modal shift. Additionally, Parking controls can be implemented retrospectively where necessary, although this falls outside the remit of the District Plan.
7.33	The housing need figure of 3,242 dwellings for Hertford needs to be explained.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Preferred Options consultation was based on technical work undertaken by Edge Analytics in 2012, combined with the 2013 CLG Household Projections. As part of the Edge Analytics technical work, population and household forecasts were disaggregated on a settlement basis. This out-dated evidence base has since been superseded by an updated four-authority Strategic Housing Market Assessment (SHMA), which presents updated evidence on which the housing target contained in the draft District Plan is now based. It should be noted that the SHMA does not seek to apportion dwelling targets to individual settlements, but rather identifies the level of need on a district-by-district basis. Proposed allocations emanating from this assessment have been made on the basis that provision should be balanced across the district where possible and delivered in the most sustainable locations.</p>
7.34	Objection to the expansion of Simon Balle school due to traffic concerns.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A planning application to allow Simon Balle to become an 'all through' facility was approved in 2014 and this opened in September 2015.</p>
7.35	Primary schools are already at capacity.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While primary education provision in Hertford was an issue at the time of consultation in 2014, especially at the primary level, the situation has been significantly improved by Simon Balle School becoming an 'all through' facility from September 2015. This has relieved pressure on other primary education facilities in the town. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period.</p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.36	Development should be located within walking distance of primary schools to relieve some of the congestion in the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Proximity of new development to services and facilities, including primary schools, has been considered through the plan making process.</p>
7.37	The ability of secondary schools to expand to meet additional demand should be explained.	<p><b>No amendment to Plan in response to this issue</b></p> <p>HCC is the Local Authority with responsibility for education in Hertfordshire. Secondary provision for the town comes under the Hertford and Ware school planning area and thus</p>

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		the educational needs of both towns are taken into account in balancing demand and provision across the combined area. The Council has worked, and will continue to work, with HCC's Education Team to ensure that the educational needs of current and future residents can be met throughout the plan period.
7.38	HCC Property seeks the removal of the Simon Balle school site from the Green Belt.	<b>No amendment to Plan in response to this issue</b> The Council does not generally seek to remove school sites from Green Belt. The potential need to expand schools, such as Simon Balle, is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Such proposals should therefore be pursued through the planning application process.
7.39	HCC Property seeks the removal of the St Joseph's Catholic Primary school site from the Green Belt.	<b>No amendment to Plan in response to this issue</b> The Council does not generally seek to remove school sites from Green Belt. The potential need to expand schools, such as St Joseph's Catholic Primary school, is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Such proposals should therefore be pursued through the planning application process.
7.40	HCC Property seeks the removal of the Morgans school site from the Green Belt.	<b>No amendment to Plan in response to this issue</b> The Council does not generally seek to remove school sites from Green Belt. The potential need to expand schools, such as Morgans school, is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Such proposals should therefore be pursued through the planning application process.
7.41	The issue of sustainable transport needs to be addressed better. Developers and infrastructure providers should be made to provide better links to new and existing services and facilities.	<b>No amendment to Plan in response to this issue</b> Each of the proposed housing allocation policies identify a need to include sustainable transport measures including encouraging walking and cycling and enhancing passenger transport services. More detail on sustainable transport initiatives required through development proposals is provided by Policy TRA1.
7.42	A list of required transport infrastructure should be provided.	<b>No amendment to Plan in response to this issue</b> 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.
7.43	Objections, including from Hertford Civic Society, to	<b>No amendment to Plan in response to this issue</b>

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	the idea that it is possible to ameliorate traffic congestion and that new bus services are easy to introduce. This issue of congestion also affects that reliability of bus services in the town.	It is considered that provision and support for sustainable transport measures which provide greater modal choice can help to facilitate a step change away from car use. While it is acknowledged that bus provision is a complex area, 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 which are aimed at achieving modal shift. Patronage would subsequently need to be of a sufficient level to ensure services are retained. Furthermore, HCC is currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering measures to encourage modal shift as part of its remit. East Herts Council is fully engaged with, and contributing to, this process, as appropriate.
7.44	Hertford Civic Society suggests that a stronger strategy is required to start to reduce congestion including encouraging car sharing and use of public transport, greater encouragement of schools to develop walking buses and sustained advertising of the health and community benefits of not using cars.	<b>No amendment to Plan in response to this issue</b> HCC, as highway authority, has primary responsibility for transport and strategic policies to affect modal shift and therefore this largely falls outside the remit of the District Plan. In forwarding sustainable transport objectives, HCC is currently preparing its 'Hertfordshire 2050 Transport Vision'. East Herts Council is fully engaged with, and contributing to, this process, as appropriate. At the local level, where the Council has the ability to influence modal choice, each of the proposed housing allocation policies identify a need to include sustainable transport measures including encouraging walking and cycling and enhancing passenger transport services. More detail on sustainable transport initiatives is also provided by Policy TRA1. An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.
7.45	Existing bus services from Hertford to surrounding areas need to be made much more frequent if a reduction in car usage is to be encouraged.	<b>No amendment to Plan in response to this issue</b> East Herts Council seeks to promote sustainable transport choices through new development and Policy TRA1 is a key element in this approach. The Council will continue to work closely with HCC, as transport authority, in order to establish how new or extended bus routes could be provided to serve new development where this would be appropriate. However, it is acknowledged that the availability of resources will limit the amount of provision that can be made to surrounding areas.
7.46	Developments have taken place with an insufficient amount of car parking under the assumption that this would encourage people to use other transport options. This has not been the case and leads to an increase in cars parked on the street.	<b>No amendment to Plan in response to this issue</b> The District Plan is concerned with future development and therefore does not seek to comment on previous development schemes; however, the Council's Vehicle Parking Standards have been revised since the Preferred Options consultation took place, which will influence the amount of parking provided at new development in the future. It is important

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		that adequate parking provision is made to avoid displacement parking, while providing the opportunities for sustainable travel options to encourage modal shift.
7.47	More emphasis should be given to improving the Hertford town centre. Hertford's historic character should not be used as an excuse to limit the potential for change. There needs to specific identification of sites within the town centre that should be improved.	<p><b>No amendment to Plan in response to this issue</b></p> <p>In 2014, the Council, working together with HCC and Hertford Town Council, commissioned the Hertford Town Centre Urban Design Strategy (HTCUDS) for the town centre. This Strategy, which was finalised in February 2016 and agreed by all three councils, will inform future development of and movement within the town centre, seek to revitalise commercial activity, and secure the long-term health of its shopping areas. The Strategy suggests measures to improve specific identified 'quarters' in the town in ways that will introduce change while respecting the historic characteristics of the town.</p>
7.48	English Heritage (now Historic England) welcomes reference to the preservation of Hertford's market town character, the towns setting and the green infrastructure within it. However this section could be expanded upon.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed. It is considered that this section explains the importance of Hertford's character and setting and the need for this to be preserved; however, while no specific amendment is proposed as a result of this response, the completion of the Hertford Town Centre Urban Design Strategy has also served to recognise the important unique characteristics of the town and additional text will be added to the chapter in this respect.</p>
7.49	There is already too much congestion in the town, and in particular on the A414, which will be exacerbated by new development. Town centre roads cannot be widened so there is no solution to this issue.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The constraints of traffic in Hertford are well known and investigations have been undertaken by HCC to seek to identify measures that would mitigate congestion on the A414 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.</p> <p>Each of the proposed housing allocation policies identify a need to include sustainable transport measures including encouraging walking and cycling and enhancing passenger transport services. More detail on sustainable transport initiatives is provided by Policy TRA1.</p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.50	Green Belt land should not be used for new development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft District Plan includes a series of 'Guiding Principles' one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the</p>

Issue Number	Issue	Officer Response
		success of this approach in the Council's past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. Therefore a certain amount of development on current Green Belt land is therefore required to ensure that East Herts is able to meet its identified needs.
7.51	There are large swathes of empty land near Hertford East station. People should live close to stations for reasons of sustainability.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy HERT2 relates to the Mead Lane area which lies adjacent to the River Lea. The adopted Mead Lane Urban Design Framework (UDF) seeks to provide a framework for the redevelopment of this area. A key aspect of the Framework is to protect existing employment space where possible, and to provide new high quality units. In order to help achieve this, it is acknowledged that some residential development is required on site, some of which has already been delivered in recent years. The implementation of the proposals contained within the UDF will result in a significant enhancement to the character and environment of this part of Hertford. However, the traffic constraints of the area will limit the amount of additional development that can be accommodated in this area.</p>
7.52	<p>Hertford Civic Society and others believe that proposed allocations HERT3 and HERT4 should be removed from the draft District Plan. This is due to traffic congestion issues and lack of opportunities to use public transport. More appropriate alternatives should be considered:</p> <ul style="list-style-type: none"> <li>• Part of County Hall and suitable adjacent land should be allocated for residential use</li> <li>• Conversion of the Telephone Exchange and large office blocks such as Stag House which are finding it difficult to attract tenants.</li> </ul>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Proposed allocations HERT3 and HERT4 are considered to offer good opportunities to access local bus provision and HERT3 is in good proximity to Hertford North Station. In respect of congestion, while Hertfordshire County Council (HCC) has already indicated that it is able to support the development proposed at both of these locations, the Council will continue to work with HCC, which has already carried out a Hertford A414 specific study, to seek to mitigate congestion as part of ensuring that the highway network can operate effectively with the additional development proposed in the Plan. HCC is also 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.</p> <p>The sites identified as specific alternatives to HERT3 and HERT4 in the response are not currently available for re-development and it is not clear when, or if, they might become available. It would therefore be inappropriate to include these sites in the District Plan. In addition, re-development of these sites would not be likely to provide the same housing yield as the proposed sites to the West and North of Hertford.</p>
7.53	A new town in the A10 corridor is required.	<p><b>No amendment to Plan in response to this issue</b></p> <p>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</p>

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		would be less sustainable than other options and would be unlikely to be delivered within the plan period to 2033.
7.54	The new primary school at Simon Balle will be on the opposite side of town to most of the proposed development which will increase congestion issues. Sele School should be expanded.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Since the Preferred Options consultation, Simon Balle School has become an ‘all through’ facility with additional primary provision opening in September 2015. This has relieved pressure on other primary education facilities in the town and, over time, will mean that pupils will become more evenly dispersed in terms of attending their closest school thus negating the need to incur cross-town journeys.</p> <p>The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period and the potential expansion of schools will form part of this process.</p>
7.54a	If a new school is to be located on Mangrove Road then the logical place for access is through the road that comes from Hertford Heath.	<p><b>No amendment to Plan in response to this issue</b></p> <p>A planning application to allow Simon Balle to become an ‘all through’ facility was approved in 2014 and this opened in September 2015.</p>
7.55	The housing sites proposed for Hertford are logical and will have no real impact on the Green Belt.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed.</p>
7.56	There is a lack of capacity at GP surgeries in the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council continues to liaise with NHS England and other health providers in order to understand any capacity issues at GP surgeries and ensure that appropriate provision can be made in relation to patients generated by new development. An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.57	Housing developments are generally geared towards building flats which does not cater for families.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposed housing allocation policies all seek a range of dwellings types in accordance with the provisions of Policy HOU1.</p>
7.58	Hertford does not have the level of services and facilities to support additional development unlike neighbouring towns such as Stevenage, WGC, Harlow and Hatfield.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The NPPF requires the Council to seek to meet the full objectively assessed housing needs of the District. It is acknowledged that a number of constraints exist in Hertford which limits the capacity of future growth, and this is reflected in the proposed level of housing contained within the draft Plan. Nevertheless, Hertford remains one of the most sustainable settlements in the District when taking into consideration access to services and facilities.</p>
Mead Lane Area		

Issue Number	Issue	Officer Response
7.59	Support for development in the Mead Lane area. However there has been insufficient parking provided as part of recent developments which has resulted in people parking on nearby streets. Future development needs sufficient parking.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed. The District Plan is concerned with future development and therefore does not seek to comment on previous development schemes, however, the Council's Vehicle Parking Standards have been revised since the Preferred Options consultation took place, which will influence the amount of parking provided at new development in the future. It is important that adequate parking provision is made to avoid displacement parking, while providing the opportunities for sustainable travel options to encourage modal shift.</p>
7.60	Concern regarding the lack of infrastructure provided alongside new development in recent times. The roads struggle to cope, in particular the junction of Mill Road and Ware Road.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The constraints of traffic in Hertford are well known and investigations have been undertaken by HCC to seek to identify measures that would mitigate congestion on the A414 (to which the Mill Road and Ware Road junction is closely linked) as part of ensuring that the highway network can operate with the additional development proposed in the Plan. The Hertford and Ware Urban Transport Plan identified potential schemes which could be implemented in the Mead Lane area (including, <i>inter alia</i>, the Mill Road and Ware Road junction) to mitigate congestion generated by development in the area and some of these are reflected in the adopted Mead Lane Urban Design Framework.</p> <p>HCC is also 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.</p> <p>Each of the proposed housing allocation policies identify a need to include sustainable transport measures including encouraging walking and cycling and enhancing passenger transport services. More detail on sustainable transport initiatives is provided by Policy TRA1. An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.61	Hertford Town Council and others suggest that there should be houses provided in this area rather than just flats.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposed housing allocation policies all seek a range of dwellings types in accordance with the provisions of Policy HOU1. The adopted Mead Lane Urban Design Framework provides further details regarding the form of development anticipated to be provided in this area.</p>
7.62	The Environment Agency states that part of the HERT2 site is located within Flood Zone 2. The Sequential Test should therefore be applied. An	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is recognised that an SFRA Level 2 is required and this is in the process of being prepared prior to the submission of the Plan.</p>

Issue Number	Issue	Officer Response
	SFRA Level 2 is required in order to be 'sound'.	In respect of surface water or drainage flooding, the development would need to include sustainable drainage measures in accordance with the Council's Strategic Flood Risk Assessment, which would decrease the risk of flooding rather than exacerbate it. In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage.
7.63	Hertford Town Council and others state that it should be made clear what plans are in place to relieve congestion in the Mead Lane area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Hertford and Ware Urban Transport Plan identified potential schemes which could be implemented in the Mead Lane area to mitigate congestion generated by development in the area and some of these are reflected in the adopted Mead Lane Urban Design Framework.</p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.64	Mead Lane provides useful independent businesses which should not be sacrificed to build a shopping mall.	<p><b>No amendment to Plan in response to this issue</b></p> <p>One of the key aims of the adopted Mead Lane Urban Design Framework is to maintain and enhance existing employment space where possible and to provide new space. The Framework does not propose a new shopping mall in the Mead Lane area.</p>
7.65	Objection to using industrial land for housing.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Much of the land in the Mead Lane area covered by Policy HERT2 is vacant and derelict. Providing some housing on the site will enhance the character and environment of this area while allowing for the provision of additional new high quality employment space which otherwise would not be delivered. The adopted Mead Lane Urban Design Framework sets the parameters for development in the area.</p>
7.66	The Canal and River Trust supports the Mead Lane UDF.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed. The Mead Lane Urban Design Framework has since been adopted by the Council.</p>
7.67	The Herts and Middlesex Wildlife Trust suggests that there will be a need to mitigate and compensate indirect negative impacts on the River Lea and King's Meads, including those arising from increased public access and recreation. There are also opportunities to enhance the River Lea in this area. Contributions should be sought for habitat management.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted and agreed. The adopted Mead Lane Urban Design Framework identifies a need to protect the environmental quality of the Meads while securing opportunities to provide a more attractive setting to the river frontage.</p>
7.68	HCC identify the fact that the Hertford and Ware Urban Transport Plan (UTP) identified a series of	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. The adopted Mead Lane Urban Design Framework, which was finalised after the</p>



Issue Number	Issue	Officer Response
	measures required to support development on the site. The site should maximise sustainable transport links. A financial contribution towards a mitigation scheme for the A414 may be required.	Preferred Options consultation, includes various measures to maximise sustainable transport options, including, <i>inter alia</i> , the construction of a new link road and passenger transport interchange. An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered. The IDP will reflect the schemes contained in the Hertford and Ware Urban Transport Plan, where appropriate. Any requirements regarding the provision of financial contributions would be agreed at the planning application stage.
7.69	English Heritage states that the site adjoins the Grade II listed Hertford East railway station. Development will need to be sensitive to the scale and character of this building. The policy should refer to this.	<b>No amendment to Plan in response to this issue</b> The importance of respecting and enhancing the setting of Hertford East station is identified within the adopted Mead Lane Urban Design Framework, which is a major component of Policy HERT2.
7.70	National Grid supports the policy and the UDF. However, it is considered that the proposed number of dwellings should be considered as an approximate provision and not an absolute maximum.	<b>No amendment to Plan in response to this issue</b> Support noted and welcomed. The number of dwellings proposed for the HERT2 allocation reflects the content of the Hertford and Ware Urban Transport Plan and the adopted Mead Lane Urban Design Framework and is considered to be an appropriate figure, taking into account the size of the site and the need to provide supporting infrastructure while maintaining and enhancing the employment offer in this part of the town. Nevertheless, it is acknowledged that the precise number of dwellings to be provided will need to be agreed at the planning application stage.
7.71	Site promoter concerned that the draft Plan would fail to meet the housing needs of Hertford and that too much emphasis is placed on the need to maintain employment land. Dicker Mill should be redeveloped for residential use.	<b>No amendment to Plan in response to this issue</b> Within the draft Plan and the adopted Mead Lane Urban Design Framework, the Dicker Mill site is proposed for continued employment use. It is considered that these units provide an important part of the overall employment offer in Hertford, particularly for smaller businesses, and that they should therefore be maintained.
7.72	Thames Water states that they do not envisage infrastructure concerns regarding waste water capability in relation to this site.	<b>No amendment to Plan in response to this issue</b> Noted.
7.73	HCC Property object to the Policy as the Mead Lane Urban Design Framework (MLUDF) does not contain any reference to the infrastructure required through planning obligations including education and other services.	<b>Proposed amendment to Plan in response to this issue</b> The MLUDF sets the design and access concept parameters for the development of the site, but does not provide full masterplanning for this location. In this regard it does not therefore enter into details in respect of requirements related to planning obligations, which would be considered at the planning application stage. However, it is acknowledged that, in the context of the District Plan, reference should be made to the need for additional infrastructure to be provided through planning obligations and that appropriate wording should be added to the policy.

Issue Number	Issue	Officer Response
7.74	There should be an increase in the amount of dwellings built on Mead Lane. 450 homes would be achievable at the location and ease pressures elsewhere.	<b>No amendment to Plan in response to this issue</b> Work undertaken as part of the Hertford and Ware Urban Transport Plan, 2010, prior to the production of the Mead Lane Urban Design Framework (MLUDF), 2015, demonstrated that the amount of residential development to be delivered in the area should be limited to the numbers proposed, largely due to traffic and identified constraints on the local road network.
7.75	Dicker Mill (Mead Lane) should be added to HERT2 and its usage should be changed from employment to residential.	<b>No amendment to Plan in response to this issue</b> Work undertaken as part of the Hertford and Ware Urban Transport Plan, 2010, prior to the production of the Mead Lane Urban Design Framework (MLUDF), 2015, demonstrated that only a limited amount of residential development could be delivered in the area, largely due to traffic and identified constraints on the local road network. In seeking to regenerate the long-vacant National Grid site and to bring forward sustainable transport solutions as part of such development, it is not considered that it would be appropriate to seek to deliver residential development in the Dicker Mill area as this would need to be at expense of the equivalent number of dwellings in the area promoted by the MLUDF. Such an approach could make the benefits that the supported scheme would provide, especially in respect of sustainable travel initiatives, undeliverable.
7.76	This development will increase the amount of congestion in the centre of Hertford. There should be an access road created from Mead Lane to either the A10 or Ware Road.	<b>No amendment to Plan in response to this issue</b> Work undertaken as part of the Hertford and Ware Urban Transport Plan, 2010, prior to the production of the Mead Lane Urban Design Framework (MLUDF), 2015, ruled out a secondary point of access to the area. It also identified traffic issues and constraints on the local road network and, taking these into account, concluded that only a limited amount of residential development could be delivered in the area. Accordingly, Policy HERT2 restricts the number of dwellings to that supported by the MLUDF along with mitigation measures to ensure that the local road network would not be overburdened.
West of Hertford		
7.77	HCC supports the preservation of Archers Spring	<b>No amendment to Plan in response to this issue</b> Support noted and welcomed
7.78	The proposals threaten the preservation of the Panshanger Park contrary to the NPPF. The Plan erroneously states that the Country Park shall be provided as a condition of development of land East of Welwyn Garden City. This is already a condition dating back 35 years relating to planning permission	<b>Proposed amendment to Plan in response to this issue</b> It is not considered that the proposals for development in Hertford would threaten the preservation of the Panshanger Park as it would not be located within the Park boundaries, rather the residents of new development to the West of Hertford would benefit from access to this valuable resource. A Heritage Impact Assessment has been completed for the Panshanger Park and its

Issue Number	Issue	Officer Response
	to mine the park.	environs, which was jointly commissioned and project managed between officers of Welwyn Hatfield and East Herts Councils, using a brief approved by English Heritage officers. The recommendations of the HIA will inform the masterplanning of the site and be taken into account as a material consideration through the planning application process. The Hertford Chapter does not itself make reference to providing a Country Park (rather it details 'furtherance of' and 'contributions towards' 'the Panshanger Country Park initiative') which has benefited from public access in the Hertford area since the consultation took place.
7.79	There are known sink holes in the Sele Farm area.	<b>No amendment to Plan in response to this issue</b> While there has been experience of a sink hole in the local area, there are no known geological concerns for the Policy HERT3 area. Any such issues would be addressed as part of the planning application process.
7.80	Some limited development is appropriate on the site on the B1000 as it has been neglected and is used for waste tipping.	<b>No amendment to Plan in response to this issue</b> Support noted and welcomed.
7.81	Development in this area would cause significant traffic problems to the detriment of Panshanger Park. Brownfield sites should be used first.	<b>No amendment to Plan in response to this issue</b> The draft District Plan includes a series of 'Guiding Principles' one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council's past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. A certain amount of development on current Green Belt land is therefore required to ensure that East Herts is able to meet its identified needs. It is not considered that the impact of development on Panshanger Park would be unduly significant and Policy HERT3 identifies a need for financial contributions towards the furtherance of the Panshanger Park initiative. A Heritage Impact Assessment has been completed for the Panshanger Park and its environs, which was jointly commissioned and project managed between officers of Welwyn Hatfield and East Herts Councils, using a brief approved by English Heritage officers. The recommendations of the HIA will inform the masterplanning of the site and be taken into account as a material consideration through the planning application process.
7.82	HCC suggests that further modelling is required to assess the impact of development in this location on the local road network.	<b>No amendment to Plan in response to this issue</b> Since the Preferred Options consultation, further transport evidence has been submitted in respect of the site as part of the Delivery Study. HCC has raised no objection to that evidence or to the site being delivered within the first five years of the Plan.

Issue Number	Issue	Officer Response
		<p>HCC is also currently preparing its 'Hertfordshire 2050 Transport Vision' which is considering strategic mitigation schemes as part of its remit and the A414 through Hertford, to which this site is closely located, is a key issue for consideration through this process. East Herts Council is fully engaged with, and contributing to, this process, as appropriate. Each of the proposed housing allocation policies identify a need to include sustainable transport measures including encouraging walking and cycling and enhancing passenger transport services. More detail on sustainable transport initiatives is provided by Policy TRA1.</p>
7.83	<p>These sites act as buffers between Hertford and Panshanger Park and are important areas used by wildlife and for recreation. The proposals would result in increased usage of Panshanger Park, and the proximity of new development would lead to rubbish dumping, light pollution. There may also be an increase in flooding.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is not considered that the impact of development on Panshanger Park would be unduly significant and Policy HERT3 identifies a need for financial contributions towards the Panshanger Park initiative. Panshanger Park encourages public access to this valuable resource.</p> <p>A Heritage Impact Assessment has been completed for the Panshanger Park and its environs, which was jointly commissioned and project managed between officers of Welwyn Hatfield and East Herts Councils, using a brief approved by English Heritage officers. The recommendations of the HIA will inform the masterplanning of the site and be taken into account as a material consideration through the planning application process. There is no evidence to suggest a correlation between new development and rubbish dumping.</p> <p>The consideration of any potential light pollution issues would be made in light of Policy EQ3 Light Pollution, which seeks to ensure minimal impact in this respect.</p> <p>As the site lies outside Flood Zones 2 or 3, the risk of river (fluvial) flooding is considered to be low. In respect of surface water or drainage flooding, the development would need to include sustainable drainage measures in accordance with the Council's Strategic Flood Risk Assessment, which would decrease the risk of flooding rather than exacerbate it. In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage.</p>
7.84	<p>The current draft District Plan states the need for 'clear and unambiguous' Green Belt boundaries. Thieves Lane provides exactly such a boundary and should not be compromised.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>While Thieves Lane does indeed currently provides a clear boundary, the Council is required to meet its full housing needs. This makes a certain amount of development on current Green Belt land necessary to ensure that East Herts is able to meet its identified needs; and, therefore, development in sustainable locations, such as the HERT3 area, necessitates a review of the Green Belt boundary. In this respect, it is considered that the existing tree belts and the boundary to Panshanger Park would also represent a strong, clear and unambiguous Green Belt boundary.</p>

Issue Number	Issue	Officer Response
7.85	The site on the B1000 should not be developed as there maybe asbestos or unknown chemicals present.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council's validation checklist requires a Land Contamination Assessment to be submitted in support of planning applications for sites where there is a risk of contamination. Any currently unknown issues of that nature would therefore be identified at the planning application stage.</p>
7.86	The services and facilities in this area are not sufficient to meet the needs of additional development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Given that Hertford is the second largest town in the District, it is considered to be a sustainable location for development. The area to the West of Hertford is well served by various services and facilities, including having shops, schools, a rail station and bus services all located nearby as well as access to the Panshanger Country Park. For road users, there is good access to the A414.</p>
7.87	The drainage system needs to be upgraded to cope with additional rainfall in order to avoid the flow of water which currently occurs at the junction of Welwyn Road and North Road.	<p><b>No amendment to Plan in response to this issue</b></p> <p>No objection from relevant authorities with responsibility for drainage or highways has been received in respect of this proposed development. In respect of surface water or drainage flooding, the development would need to include sustainable drainage measures in accordance with the Council's Strategic Flood Risk Assessment, which would decrease the risk of flooding rather than exacerbate it.</p> <p>In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage.</p>
7.88	The River Mimram is under pressure from over abstraction and any housing in this area would lead to lower water levels and poorer water quality.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This issue is addressed by Water Resources Management Plans (WRMP) prepared by the water companies. WRMPs are approved by the Secretary of State. The Council will continue to engage with the relevant water providers in order to reduce the risk of damage to the environment from growth and development. However, it is not considered that the proposals would negatively impact the River Mimram.</p>
7.89	Figure 7.4 shows a site with a 'panhandle' extending along Welwyn Road. This panhandle would add little to housing supply but would cause great visual intrusion.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The 'panhandle' is considered to be well related to the rest of the site and the mature tree belt beyond it forms a suitable long term Green Belt boundary.</p>
7.90	Hertford Town Council and others support the development of land north of Welwyn Road subject to suitable design, dwelling mix and provision of open space. The parish boundaries would need to be amended to incorporate the new development within Hertford.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Policy HERT3 identifies a need to provide for a range of housing types in accordance with the provisions of Policy HOU1, and that public amenity green space and quality local green infrastructure should also be provided.</p> <p>A Heritage Impact Assessment has been completed for the Panshanger Park and its environs, which was jointly commissioned and project managed between officers of Welwyn</p>

Issue Number	Issue	Officer Response
	If development is to occur west of Thieves Lane, there needs to be a buffer with the woodland of Panshanger Park. High quality/low density housing should be encouraged in this location.	Hatfield and East Herts Councils, using a brief approved by English Heritage officers. The recommendations of the HIA will inform the masterplanning of the site and be taken into account as a material consideration through the planning application process. The issue of Parish boundaries falls outside the remit of the District Plan. It is agreed that a suitable buffer should be provided and that this should be identified within the policy.
7.91	Opposition to development in this area as it will impact on the openness of the Green Belt as defined in the NPPF.	<b>No amendment to Plan in response to this issue</b> A certain amount of development on current Green Belt land is necessary to ensure that East Herts is able to meet its identified needs; and, therefore, development in sustainable locations, such as the HERT3 area, necessitates a review of the Green Belt boundary. It is considered that the existing mature tree belt on the edge of the site provides a suitable long term Green Belt boundary and, to a large extent, would screen the development meaning that the impact on the openness of the Green Belt would be limited.
7.92	Access from the site north of Welwyn Road directly on to the B1000 would be dangerous.	<b>No amendment to Plan in response to this issue</b> No objection has been raised by HCC as Highway Authority in respect of the development being accessed from Welwyn Road. Detailed access proposals would be considered at the planning application stage. However, HCC has indicated that development may have an impact on other local road junctions and that mitigation may therefore be required in this respect.
7.93	Development in this location would contribute to the harm being caused to the character of the town.	<b>No amendment to Plan in response to this issue</b> It is not considered that a sensitive development at the level proposed would have a negative impact on the character of the town.
7.94	The area to the west of Thieves Lane forms part of the setting to the registered park which includes listed buildings and landscape which incorporates the work of both Capability Brown and Humphrey Repton. In particular, the Friends of Panshanger Park consider that the impact of development on the Park would be significant and that the proposed allocation should be removed from the plan. The proposals are contrary to the NPPF.	<b>No amendment to Plan in response to this issue</b> It is not considered that the impact of development on Panshanger Park would be unduly significant and development can be designed to avoid the most sensitive areas. A Heritage Impact Assessment has been completed for the Panshanger Park and its environs, which was jointly commissioned and project managed between officers of Welwyn Hatfield and East Herts Councils, using a brief approved by English Heritage officers. The recommendations of the HIA will inform the masterplanning of the site and be taken into account as a material consideration through the planning application process. Policy HERT3 also identifies a need for financial contributions towards the Panshanger Park initiative. Sensitive planning at the application stage can ensure that the development respects its setting and allows for the accommodation of views and access to the Park. It is considered that the existing mature tree belt on the edge of the site provides a suitable

Issue Number	Issue	Officer Response
		long term Green Belt boundary and, to a large extent, would screen the development.
7.95	<p>Herts and Middlesex Wildlife Trust indicates that the site to the north of Welwyn Road, while subject to mis-use, is valued by local residents as a green space. Loss of the wildlife site (59/077) should be avoided and suitable management secured. High quality and multi-functional green space should be planned into any development. The impact on Panshanger Park will also need to be mitigated including impacts associated with dog walking, recreational pressure and cat predation.</p> <p>Development west of Thieves Lane also needs to be mitigated in order to minimise impacts on the woodland and Panshanger Park including a suitable buffer.</p>	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Policy HERT3 states that Local Wildlife Site 59/077 should be protected and that public amenity green space and quality local green infrastructure should be provided. It is not considered that the impact of development on Panshanger Park would be unduly significant (indeed public access to the area is already available and encouraged to some areas) and development can be designed to avoid the most sensitive areas. A Heritage Impact Assessment has been completed for the Panshanger Park and its environs, which was jointly commissioned and project managed between officers of Welwyn Hatfield and East Herts Councils, using a brief approved by English Heritage officers. The recommendations of the HIA will inform the masterplanning of the site and be taken into account as a material consideration through the planning application process. Policy HERT3 also identifies a need for financial contributions towards the Panshanger Park initiative.</p> <p>However, in respect of the development to the south of Welwyn Road/west of Thieves Lane, it is agreed that mitigation, including a suitable buffer, should be provided and that this should be identified within the policy.</p>
7.96	<p>HCC indicates that development in this location may have an impact on local road junctions and mitigation may be required. Bus, cycle and walking improvements would also be required. A financial contribution towards a mitigation scheme for the A414 is likely to be required.</p> <p>There may be an opportunity for mineral extraction on the site north during construction.</p>	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Noted. The Council will continue to work closely with HCC 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. The policy identifies the need to include sustainable transport measures.</p> <p>It is noted that development schemes may be required to provide a financial contribution towards a mitigation scheme for the A414. However this would be agreed at the planning application stage.</p> <p>In respect of potential mineral extraction on site, wording should be added to Policy HERT3 to detail this potential requirement.</p>
7.97	<p>Support for the proposed allocation West of Hertford. However, given the physical separation between the two developments (North/South of Welwyn Road) it is suggested that the two sites should have separate policies.</p>	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed. The policy is already sub-divided in parts I and II to distinguish between the two areas; however, as there are several areas within the policy where the provision of infrastructure is likely to be required which may involve joint involvement of both site promoters (e.g. sustainable transport measures), it is considered appropriate that the policy remains as a single entity.</p>

Issue Number	Issue	Officer Response
7.98	Thames Water has concerns regarding waste water services in relation to this site. If upgrades to the network are required then there would be a 3 year lead in time to achieve this.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While it is acknowledged that waste water services are an important issue in respect of site delivery, the Council is confident that upgrades could be achieved through development of the site and dialogue is continuing between Thames Water and the site promoters in this respect. While this is clearly an important issue, it is expected that waste water services would form part of a planning application and be fully resolved via this process.</p>
7.99	There is a lack primary school capacity in the area to the west of the town.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While primary education provision in Hertford was an issue at the time of consultation in 2014, the situation has been significantly improved by Simon Balle School becoming an 'all through' facility from September 2015. This has relieved pressure on other primary education facilities in the town. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period.</p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.100	Directing some limited development to all villages would form a suitable alternative to development in this location.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The development strategy already provides for development within villages appropriate to their size and scale. To reallocate a further 550 dwellings to the villages, as suggested in the response, would not be considered to provide a suitable sustainable alternative to the HERT3 site which has good access to existing local schools and services.</p>
7.101	Development to the West of Hertford will affect the separation between Hertford (Historic market town) and its neighbouring Garden City (Welwyn Garden City). This proposal threatens to encroach on the villages between Hertford and Welwyn Garden City and destroy their distinctive character.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Issues relating to coalescence with Welwyn Garden City were considered as part of the sieving process in respect of development to the west of Hertford. However, taking into account the need to meet identified housing need; considering that permission has previously been granted for alternative development in part of this location; and the high sustainability locational aspects of the two sites in respect of access to schools, facilities and passenger transport, on balance, this location is considered suitable for residential development subject to the criteria contained in draft Policy HERT3.</p>



Issue Number	Issue	Officer Response
7.102	Building on Green Belt runs the risk of coalescing Hertford with Welwyn Garden City and/or Ware.	<p><b>No amendment to Plan in response to this issue</b></p> <p>One of the key principles of Green Belt, as identified by the National Planning Policy Framework, is to avoid the coalescence of settlements. This has been considered as part of the detailed site assessment process for the District Plan and, in particular, development in the gaps between the towns of Hertford and Ware were fully considered and options that would compromise these areas were discounted. It is not considered that the proposed developments detailed in the draft Plan would threaten the individual identity of Hertford or any other neighbouring town.</p>
7.103	Development to the South of Welwyn Road would destroy the beautiful views (Lady Hughe's Wood & Blakemore Wood).	<p><b>No amendment to Plan in response to this issue</b></p> <p>While there would inevitably be loss of some views, the criteria of Policy HERT3 and other policies of the draft Plan would ensure that development would respect the site's unique setting. A Heritage Impact Assessment has been completed for the Panshanger Park and its environs, which was jointly commissioned and project managed between officers of Welwyn Hatfield and East Herts Councils, using a brief approved by English Heritage officers. The recommendations of the HIA will inform the masterplanning of the site and be taken into account as a material consideration through the planning application process.</p>
7.104	Site Promoter considers that 350 dwellings could be accommodated at the North of Welwyn Road development. This is because this figure would result in a housing density of 23dph, which is lower than the 30dph set in HOU2.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The number of dwellings proposed in the policy is based on the developable area considered likely, taking into account the infrastructure to be delivered and the local context, especially in regard to wildlife matters. The consideration of the site to deliver any potential additional dwellings would take place through the planning application process.</p>
7.105	HCC Minerals consider that there may be the opportunity to extract resources for use on site (both north and south of Welwyn Road) during development.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Policy to be amended to include this matter.</p>
North of Hertford		
7.106	Bengeo Primary School is already oversubscribed. Development on Sacombe Rd in Bengeo would put further stress on primary schools	<p><b>No amendment to Plan in response to this issue</b></p> <p>While primary education provision in Hertford was an issue at the time of consultation in 2014, the situation has been significantly improved by Simon Balle School becoming an 'all through' facility from September 2015. This has relieved pressure on other primary education facilities in the town. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period.</p> <p>An Infrastructure Delivery Plan is currently being prepared which will identify any</p>

Issue Number	Issue	Officer Response
		infrastructure requirements and will include information on how and when specific schemes will be delivered.
7.107	Figure 7.1 is misleading with respect to development north of Hertford as, at the point where Sacombe Road and Wadesmill Road fork, the map is shaded grey to indicate that it is part of the existing built up area. This area is actually allotments and is therefore not already built up.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Figure 7.1 is a very high level strategic diagram, the purpose of which is purely to show the location of the proposed allocations in relation to the broad built up area of Hertford. It is not designed to show different land uses in detail; indeed many other green spaces in the town have likewise been shaded over for the purposes of this illustration. However, it should be noted that, in order to provide a robust Green Belt boundary, this allotment area, while retaining its protected status, would be removed from the Green Belt.</p>
7.108	The recent development in Sacombe Rd has resulted in on street parking causing congestion which has been partially relieved by the use of the Nursery car park. Development of this car park, and the resulting extra traffic would make the congestion worse.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan is concerned with future development and vehicle parking standards have been reviewed as part of this process. However, it is important to note that any informal arrangements at the Nursery site do not form part of the parking allocation provided as part of the permission attached to the Sacombe Road development and thus its potential loss would not constitute a planning matter in this respect. Consideration of the appropriate level of car parking provision and access arrangements to the HERT4 site would be made in light of local conditions, including the need for any highway mitigation measures, as appropriate, through the planning application process.</p>
7.109	This is an intrusion on the Green Belt which should not be allowed.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft District Plan includes a series of 'Guiding Principles' one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council's past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. Therefore, a certain amount of development on current Green Belt land is required to ensure that East Herts is able to meet its identified needs.</p>
7.110	Water pressure in the area is already below standard at certain times. Additional development will make this worse.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The issue of water supply is addressed by Water Resources Management Plans (WRMP) prepared by the water companies. WRMPs are approved by the Secretary of State. The Council will continue to engage with the relevant water providers. However, any existing issues with water pressure should be addressed outside of the work being carried out on the District Plan.</p>
7.111	No reference is made to protecting allotments. It is short sighted to build houses on allotments.	<p><b>No amendment to Plan in response to this issue</b></p> <p>No specific reference is made to the protection of allotments. However, the allotments at Sacombe Road are important as spaces for community use and, as such, would be</p>

Issue Number	Issue	Officer Response
		protected by Policy CFLR7 (Community Facilities).
7.112	Development in this location will greatly affect the house prices of surrounding properties which will have an impact on residents' financial future.	<b>No amendment to Plan in response to this issue</b> Property values are not a planning matter and cannot be taken into account in the plan making process.
7.113	There is already significant pressure on services and facilities in the Bengoe area including retail and health. Additional development will exacerbate this problem.	<b>No amendment to Plan in response to this issue</b> It is not considered that a development of the scale proposed would add significant pressure to existing services and facilities; indeed the retail units would be likely to benefit from additional custom. The Council will continue to liaise closely with service and infrastructure providers in order to ensure that any negative impacts can be mitigated.
7.113a	The loss of the petrol station has had an impact on Bengoe.	<b>No amendment to Plan in response to this issue</b> While the loss of such facilities is to be regretted, this site-specific matter is beyond the scope of the District Plan.
7.114	Any development in this location should be adequately shielded to limit landscape impact, should provide affordable housing for local people, provide adequate parking and also be environmentally friendly and well designed.	<b>No amendment to Plan in response to this issue</b> These issues are already addressed, either specifically by Policy HERT4 or through other policies in the draft Plan. Any detailed design issues would be addressed at the planning application stage.
7.115	HCC suggests that development in this area is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application. A financial contribution towards a mitigation scheme for the A414 may be required.	<b>No amendment to Plan in response to this issue</b> Noted that this is the HCC response in respect of development up to 150 dwellings. Any requirements regarding the provision of financial contributions would be agreed at the planning application stage.
7.115a	Previous development at this site was rejected due to the proposals not safeguarding existing landscapes. This was contrary to ENV1, ENV2 and ENV11 of the Local Plan 2007. The situation has not changed at this site.	The planning application (3/12/2138/FP) was refused in 2013 for a number of reasons, most of which related to the particulars of the specific scheme submitted at that time, in a decision taking context. In terms of considering the site in the plan making context, many issues have been taken into account. The draft District Plan includes a series of 'Guiding Principles' one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council's past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. Therefore, a certain amount of development on current Green Belt land is required to ensure that East Herts is able to meet its identified needs. The sieving process, undertaken at the preliminary plan making stages, assessed the site against all other reasonable alternatives. This, and subsequent investigations, have led

Issue Number	Issue	Officer Response
		Officers to conclude that the sustainable location of this site would make it suitable for development at the level proposed.
7.116	There is already congestion in this area which would only get worse with additional development. The roads through Bengeo are a rat run and this needs to be addressed. A new road is required between Bengeo and the west of Hertford. Sacombe Road is too narrow to cater for additional traffic. Congestion has partly been caused by cars parked on Sacombe Rd which has got worse following the recent housing development. This issue is exacerbated when children are dropped off for school.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The HCC Highways response to the consultation suggests that development in this location is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application to ensure successful mitigation. It is currently proposed that only 50 dwellings out of the overall total of 150 would be accessed from the redevelopment of the Nursery site on Sacombe Road, with the remaining dwellings achieving access via the B158, Wadesmill Road.</p> <p>Transport modelling work is currently ongoing by HCC to aid the preparation of its 'Hertfordshire 2050 Transport Vision'. This should assist in providing a greater understanding of the potential impact of development on both the strategic and local highway networks, and any identifying any specific mitigation measures that may be needed as a result.</p> <p>Policy HERT4 identifies a need to incorporate sustainable transport measures including the encouragement of walking and cycling and enhanced passenger transport services.</p>
7.117	The only way that congestion in Bengeo could be resolved is through an improvement to existing bus services by making them more frequent. Public transport is not of a good enough standard.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy HERT4 identifies a need to incorporate sustainable transport measures including the encouragement of walking and cycling and enhanced passenger transport services. Such provision would be achieved through planning obligations at the application stage.</p>
7.118	The proposals would have a negative impact on wildlife which uses the site and the nearby Waterford Heath nature reserve, including Meadow Pipits, Skylarks and the Clouded Yellow butterfly. The Herts and Middlesex Wildlife Trust and others indicate that the impact of development on Waterford Heath nature reserve should be mitigated.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>Suitable mitigation measures should be identified through the planning application process to ensure that development will not impact negatively on the wildlife of this site and the nearby Waterford Heath nature reserve. Policy to be amended to reflect this.</p>
7.119	Sacombe Road forms a natural Green Belt boundary which should not be amended.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The site currently forms a gap in the urban fabric in this part of Hertford and it is considered that 'rounding off' the pattern of development would provide a strong green belt boundary in the longer term.</p>
7.120	Development of this site will lead to the temptation to build the other side of the B158 to join up with Rib Vale.	<p><b>No amendment to Plan in response to this issue</b></p> <p>In accordance with the National Planning Policy Framework, the Council is reviewing Green Belt boundaries in order to help cater for the District's housing needs up to 2033 and beyond. The draft District Plan does not propose development to the east of the B158 and</p>

Issue Number	Issue	Officer Response
		this area would therefore remain in the Green Belt.
7.121	Parked cars are a hazard in Sacombe Road and it will be extremely difficult for parents to pick up children from school as there will be no garden centre available for parking. Also emergency vehicles are not able to navigate down this road. This road needs to be widened to three lanes of traffic.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While parking controls could be implemented if considered appropriate by the relevant Highway and Parking authorities, this is a detailed matter for consideration at the planning application stage through the HERT4 criterion “access arrangements and appropriate local highways mitigation measures”. There has been no evidence that emergency vehicles cannot access this route. It is not proposed that this road, which is largely rural in nature, should be widened to three lanes.</p>
7.122	Hertford Town Council objects to this site and requests its removal from the plan. The narrowness of Sacombe Road and encroachment onto the green belt have not been considered. The Marquee building in the town centre is a more appropriate site for development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>It is currently proposed that only 50 dwellings out of the overall total of 150 would be accessed from the redevelopment of the Nursery site on Sacombe Road, with the remaining dwellings achieving access via the B158, Wadesmill Road. The HCC Highways response to the consultation suggests that development in this location is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application to ensure successful mitigation.</p> <p>The draft District Plan includes a series of ‘Guiding Principles’ one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council’s past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. Therefore, a certain amount of development on current Green Belt land is required to ensure that East Herts is able to meet its identified needs.</p> <p>In respect of the proposed replacement of this allocation with the Marquee building, it should be noted that, not only would the Marquee not be large enough to accommodate 150 dwellings, but since the Preferred Options consultation took place the Hertford Town Centre Urban Design Strategy has considered this town centre site and permission is currently being implemented for a gymnasium.</p>
7.123	Surface water flooding already occurs in this area and this will be exacerbated with additional development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>As the site lies outside Flood Zones 2 or 3, the risk of river (fluvial) flooding is considered to be low. In respect of surface water or drainage flooding, the development would need to include sustainable drainage measures in accordance with the Council’s Strategic Flood Risk Assessment, which would decrease the risk of flooding rather than exacerbate it. In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage.</p>

Issue Number	Issue	Officer Response
7.124	Development in this area will lead to the boundaries between Hertford and surrounding villages (Chapmore End) being eroded.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This limited scale development would effectively ‘round off’ the urban fabric of Hertford in this part of the town and, due to relative distance, is not considered to have an unduly negative impact on the identity of any nearby villages.</p>
7.125	A planning application for development on this site was recently refused. Nothing has changed to suggest that development would now be appropriate.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The planning application (3/12/2138/FP) was refused in 2013 for a number of reasons, most of which related to the particulars of the specific scheme submitted at that time. However, in terms of considering the site in the primary context of allowing development in the Green Belt, the decision does not discuss the merits or otherwise of releasing the site, but rather reflects the fact that, “if permitted prior to the publication of the East Herts District Plan, the proposal would prejudice the assessment process”. This assessment process, which assessed the site against all other reasonable alternatives, has taken place and it is considered that the site provides a sustainable location for development at the level proposed.</p>
7.126	Significant thought should be given to where the access for this development would be. An access directly onto Sacombe Road should not be pursued.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Access arrangements would need to be agreed with HCC as part of the planning application process. It is currently proposed that only 50 dwellings out of the overall total of 150 would be accessed from the redevelopment of the Nursery site on Sacombe Road, with the remaining dwellings achieving access via the B158, Wadesmill Road. The HCC Highways response to the consultation suggests that development in this location is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application to ensure successful mitigation.</p>
7.127	Support for the use of Bengo Nursery for development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed.</p>
7.128	Bengo Nursery currently provides a source of employment which would be lost. Also this site offers opportunities for Bengo to be self-sufficient by local food production.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While the site is currently operational, this small scale enterprise has a history of seasonal or occasional operation, with frequent spells of non-activity. It is not considered likely that, even if the site were to become fully operational as a nursery, that self-sufficiency in food production would be achieved for the area. The owner of the site (also the operator) has submitted the land as part of the Call-for Sites process. Due to the success of the Council’s approach to bringing forward brownfield land within the settlement boundaries in past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. This makes a certain amount of development on current Green Belt land necessary to ensure that East Herts is able to meet its identified needs. Given the brownfield nature of this edge of settlement Green Belt site, and its good location in terms of</p>

Issue Number	Issue	Officer Response
		sustainability, it is therefore considered appropriate that the site be released for residential purposes as an allocated site in the District Plan to make a contribution towards housing delivery.
7.129	HCC states that there may be an opportunity to extract resources from the site to use as part of the development.	<b>No amendment to Plan in response to this issue</b> Noted and agreed. The policy requires an allowance for the satisfactory phased extraction of underlying mineral deposits.
7.130	It would be much more appropriate to direct development to the west of Hertford where there is better access to the A414 and facilities and services including a secondary school.	<b>No amendment to Plan in response to this issue</b> Development to the north of Hertford has been limited to 150 dwellings as it is recognised that there are a number of constraints, particularly in relation to waste water, educational capacity, traffic congestion issues and the need to protect the environment of the Rib Valley. The draft District Plan already proposes that a total of 550 dwellings be delivered to the west of Hertford in addition to development to the north of Hertford, not in place of.
7.131	It would be better if there were fewer houses and more community facilities in this part of Hertford. Development could be more dispersed around the town.	<b>No amendment to Plan in response to this issue</b> Policy HERT4 includes a requirement for the provision of social and green infrastructure and financial contributions towards other infrastructure schemes. There is a delicate balance to be reached in terms of providing a development that benefits the local community while ensuring that the scheme would be financially viable. The proposed allocated sites for Hertford involve development in a central location (Mead Lane) and peripheral development to the north, west and south of the town which will deliver development in dispersed locations around the town. Moreover, other non-allocated sites within the settlement boundaries will deliver further locational choice over the plan period.
7.132	Thames Water has concerns regarding waste water services in relation to this site. If upgrades to the network are required then there would be a 3 year lead in time to achieve this.	<b>No amendment to Plan in response to this issue</b> While it is acknowledged that waste water services are an important issue in respect of site delivery, the Council is confident that upgrades could be achieved through development of the site and dialogue is continuing between Thames Water and the site promoters in this respect. While this is clearly an important issue, it is expected that waste water services would form part of a planning application and be fully resolved via this process.
7.133	More off-street parking needs to be provided for the properties.	<b>No amendment to Plan in response to this issue</b> The District Plan is concerned with future development and vehicle parking standards have been reviewed as part of this process. Consideration of the appropriate level of car parking provision and access arrangements to the HERT4 site would be made in light of local conditions, including the need for any highway mitigation measures, as appropriate, through the planning application process.

Issue Number	Issue	Officer Response
7.134	Kler Group supports the proposed allocation but states that development of the former nursery site has the potential to be brought forward for development in the short term as the most northerly part of this site is 150 metres south of the preferred option for mineral extraction.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>While it is not considered that any early release should be made in this location, as it could be viewed as providing an undue advantage over the aspirations of promoters of other proposed allocated sites elsewhere in the district which are currently situated within the Green Belt, it is acknowledged that the former nursery site element (50 dwellings) of the overall development site (for 150 dwellings) could be developed within the first five years of the Plan. An amendment to Policy HERT4 should be made in this respect.</p>
7.135	The Ware Park Trust supports the proposed allocation. However, the site should be identified for 300 dwellings rather than 150. An application for mineral extraction will be submitted in 2014 with extraction starting in 2015. This should not be a barrier to a greater level of development. A transport study by Vectos concludes that the traffic impact of 300 dwellings would not be severe. The issue of foul sewerage is resolvable. If schools cannot be expanded then the provision of some educational use could be made on land owned by the Ware Park Trust.	<p><b>No amendment to Plan in response to this issue</b></p> <p>In consideration of the proposed increase of dwellings suggested in the response, HCC Highways has concluded that “the consequence of a 300 dwelling development is likely to exacerbate existing problems which may become significant and thus require significant infrastructure investment to mitigate. There is also uncertainty as to whether mitigating at the level required would be feasible or indeed deliverable”. Therefore, HCC Highways would only be prepared to support the development of the site for an upper limit of 150 dwellings.</p>
7.136	A woodland buffer should be created on the edge of the Bengeo development to protect the countryside from further development.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy HERT4 includes a criterion concerning the provision of landscaping. It is considered appropriate that matters of detail regarding such provision would be dealt with at the planning application stage.</p>
7.137	A new large primary school should be built on the Nursery site and houses should be built on the current school site.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Throughout the plan making process, East Herts has liaised with HCC, as Local Authority with responsibility for education, to ensure that the educational needs of children can be met and there is not currently considered to be need for a new primary school for the level of development which the proposed allocation would deliver in this location. The current primary school site has not been promoted through the SLAA process and is thus not considered to be either available or deliverable as an alternative site for residential development. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period.</p>



Issue Number	Issue	Officer Response
7.138	Additional development in the Bengo area will put stress on medical facilities as there are not doctors or dentists in Bengo.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The Council continues to liaise with NHS England and other health providers in order to understand any capacity issues at GP surgeries and ensure that appropriate provision can be made in Hertford in relation to patients generated by new development. Any such provision would not necessarily need to be located in the Bengo area, but is likely to serve the wider town.</p>
7.139	Mineral extraction at this site will mean more misery for residents who have had to deal with gravel extraction for the past decades.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Other than an allowance for the potential extraction of underlying mineral deposits for use on site during development, the matter of the acceptability or otherwise of mineral extraction in areas beyond the HERT4 site would be for HCC, as the local planning authority for mineral applications to determine.</p>
7.140	This development would increase the levels of light pollution and noise pollution in the area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The consideration of any potential light pollution issues would be made in light of Policy EQ3 Light Pollution, which seeks to ensure minimal impact in this respect.</p> <p>Hertford is not considered to suffer from particularly high levels of noise pollution and the proposed development is unlikely, by its nature, to cause any specific concerns. In this respect, no objections have been received in relation to Environmental Health issues.</p>
7.141	Cyclists and walkers will not be able to use Sacombe Road safely if development occurs.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The HCC Highways response to the consultation suggests that development in this location is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application to ensure successful mitigation. Walking and cycling measures would be delivered via the sustainable transport measures requirements of the policy, which would ensure that provision should be enhanced. The safety of access to the development would be a matter for HCC, as local Highway Authority, to determine as part of the application process and policy TRA2 'Safe and Suitable Highway Access Arrangements and Mitigation' would also apply in this respect.</p>
7.142	Development would mean extra traffic has to travel down Port Hill as the Bengo School is at capacity. Children should be able to attend their local school so they can walk to school; walking across town to a new school could be dangerous for children.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The HCC Highways response to the consultation suggests that development in this location is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application to ensure successful mitigation.</p> <p>Since the Preferred Options consultation, Simon Balle School has become an 'all through' facility with additional primary provision opening in September 2015. This has relieved pressure on other primary education facilities in the town and, over time, will mean that pupils will become more evenly dispersed in terms of attending their closest school, thus negating the need to incur cross-town journeys.</p>

Issue Number	Issue	Officer Response
7.143	There is a major issue with this development as there is a telephone mast behind the nursery. Is it legal to build houses near to this?	<b>No amendment to Plan in response to this issue</b> This would be a matter for consideration through the planning application process, where, in appropriate cases, applicants are required to submit an ICNIRP certificate.
7.144	This development will require an improvement of the roundabout at the junction of Sacombe Road and the B158.	<b>No amendment to Plan in response to this issue</b> The HCC Highways response to the consultation suggests that development in this location is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application to ensure successful mitigation.
7.145	This development will increase traffic, this will pose a hazard to pedestrians including school children.	<b>No amendment to Plan in response to this issue</b> The HCC Highways response to the consultation suggests that development in this location is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application to ensure successful mitigation.
7.146	The Local Planning Authority has not taken into account the archaeological interests of the site.	<b>No amendment to Plan in response to this issue</b> The HCC Archaeology Team has not made any specific recommendations in its consideration of the proposed site allocations in respect of this specific site, but would be considered as part of the planning application process under policies HA1 Designated Heritage Assets and HA3 Archaeology.
7.147	Bengeo sits on top of a hill, roads have steep gradients which is a barrier to cycling and walking. This will lead to more congestion if further development is permitted.	<b>No amendment to Plan in response to this issue</b> The HCC Highways response to the consultation suggests that development in this location is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application to ensure successful mitigation. Sustainable transport measures would be delivered as part of the requirements of the policy, which would ensure that provision should be enhanced and, while it is acknowledged that the topography of the area may dissuade some from walking or cycling, a potential increase in bus services would provide modal choice.
7.148	Kler Group wish to object to the phasing of the development for the part of the site which compromises the former nursery. The most northerly corner of the nursery site is located approximately 150m from the mineral extraction and therefore could be brought forward in the short term without adverse impact.	<b>Proposed amendment to Plan in response to this issue</b> While it is not considered that any early release should be made in this location, as it could be viewed as providing an undue advantage over the aspirations of promoters of other proposed allocated sites elsewhere in the district which are currently situated within the Green Belt, it is acknowledged that the former nursery site element (50 dwellings) of the overall development site (for 150 dwellings) could be developed within the first five years of the Plan. An amendment to Policy HERT4 should be made in this respect.
7.149	The Plan fails to address how this development will affect secondary school capacities.	<b>No amendment to Plan in response to this issue</b> Throughout the plan making process, East Herts has liaised with HCC, as Local Authority with responsibility for education, to ensure that the educational needs of children can be met. The Council will continue to work closely with HCC in order to ensure that the

Issue Number	Issue	Officer Response
		educational needs arising from the proposed level of development in Hertford (in respect of both primary and secondary education) can be met throughout the plan period.
7.150	Issues with broadband and telephony are not addressed in this section.	<b>No amendment to Plan in response to this issue</b> As a district-wide, rather than site specific, issue, this would be covered by policies in the Economic Development chapter.
7.151	The development should include provision of a community centre, swimming pool, tea shop, laundrette and additional classrooms for the primary school.	<b>No amendment to Plan in response to this issue</b> It is considered that there are numerous community facilities both in Bengeo and Hertford-wide, including community halls, a swimming pool at Hartham, and a parade of shops at The Avenue (less than 600m walking distance from the edge of the site). Schools do not generally favour split sites and HCC's Education Team has not suggested this approach nor objected to the site allocation in respect of school capacity.
7.151a	The land at HERT4 should not be developed at all, due to green belt and infrastructure issues. If there does have to be development it should only be the Nursery Site that is developed and only for 50 homes.	<b>No amendment to Plan in response to this issue</b> The draft District Plan includes a series of 'Guiding Principles' one of which identifies a need to prioritise the development of brownfield land. While the development strategy contained within the Plan does follow this important principle, it should be recognised that, due to the success of this approach in the Council's past adopted local plans, insufficient brownfield land remains available to meet the full housing needs of the District. Therefore, a certain amount of development on current Green Belt land is required to ensure that East Herts is able to meet its identified needs. Taking into account the need to meet identified housing need and the high sustainability locational aspects of the area in respect of access to primary education, local retail facilities and bus transport, on balance, this location is considered suitable for the residential development proposed, subject to the criteria contained in draft Policy HERT4.
South of Hertford		
7.152	HCC supports the retention of Green Fingers as far as possible.	<b>No amendment to Plan in response to this issue</b> Support noted and welcomed
7.153	Road improvements to Mangrove Rd are required to ease congestion. The junction with the A414 is a particular concern.	<b>No amendment to Plan in response to this issue</b> Policy HERT5 requires the provision of appropriate local highways measures, which would be agreed with HCC through the planning application process.
7.154	Development of this site would result in the loss of the Green Finger in this location. This is not consistent with the objective stated in Paragraph 7.1.11 that the towns Green Fingers will be maintained. The impact	<b>No amendment to Plan in response to this issue</b> The proposed development would fill an existing gap. Policy HERT5 requires the provision of a public amenity green space between the development and Hagsdell Stream in order to allow for the preservation of that part of the Hertford Green Finger. It is therefore

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	on the Green Belt would be considerable.	considered that any impact on the Green Belt would be limited.
7.155	Will the existing treed area at the higher level of the Green Finger be preserved?	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The Preferred Options version of the draft Plan included text to state that the existing treed area at the higher level of the site should be maintained; however, it is considered appropriate that this protection should also be added as part of Policy HERT5 for the avoidance of any ambiguity.</p>
7.156	The owners of land opposite HERT5 have submitted information which they believe satisfies the concerns raised during the SLAA process. The owners are happy to work with the owners of HERT5 to deliver a comprehensive development, including, inter alia, a community centre. Unlike previously with the Ashbourne Garden development where a waste water swale was built without consultation or consent, the landowners insist that no development takes place until they have been consulted.	<p><b>No amendment to Plan in response to this issue</b></p> <p>This site has previously been submitted to the Council as part of the Call for Sites process, and is currently being assessed through a technical document known as the Strategic Land Availability Assessment (SLAA). The role of the SLAA is to provide a high level strategic assessment of all sites in order to determine whether they are likely to be considered developable within the plan period. Work on the SLAA is currently ongoing and the final document will be presented to Members in August. While acknowledging that the SLAA is not yet complete, Officers do not consider that the site should be identified as an allocation within the District Plan because the site forms an integral part of the Green Finger and any development would harm its openness and character by breaching the existing line of the urban form. As such the site is not considered to be suitable for development or inclusion in the District Plan.</p> <p>Issues of land ownership and permissive rights fall outside the remit of the District Plan.</p>
7.157	Releasing this site for development may set a precedent and encourage development proposals on other parts of the Green Finger.	<p><b>No amendment to Plan in response to this issue</b></p> <p>In accordance with the National Planning Policy Framework, the Council is reviewing Green Belt boundaries in order to help cater for the District's housing needs up to 2033 and beyond. Policy HERT5 proposes that development would fill an existing gap and consolidate the built form along Mangrove Road, with development limited to within the line of trees at the top of the site rather than extending into the more sensitive open land beyond. The draft District Plan further proposes that land to the west of that area and to the east of Mangrove Road should remain in the Green Belt. Revised boundaries would be long term in nature and would not therefore encourage further development proposals to come forward.</p>
7.158	HERT5 could be amended to provide a slim 'green finger' to the north of Mangrove Drive which would preserve the rural nature of this road.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy HERT5 proposes the removal of both Mangrove Drive and Oak Grove from the Green Belt and Green Finger as part of the review of boundaries in this area. The HERT5 development would fill an existing gap and consolidate the built form along Mangrove Road, so, while land to the west of HERT5 and to the east of Mangrove Road would remain in the Green Belt and Green Finger, the inclusion of a 'slim green finger' in this location would not</p>

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		provide a strong defensible boundary.
7.159	The highway mitigation measures referred to need to be defined.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Highway mitigation measures which are considered necessary by HCC, as Highway Authority, would be refined through the planning application process.</p> <p>An Infrastructure Delivery Plan is also currently being prepared which will identify any infrastructure requirements and will include information on how and when specific schemes will be delivered.</p>
7.160	Consideration needs to be given to the wildlife that use the Green Fingers, and HERT5 in particular. The Green Fingers bring wildlife in close proximity to the town centre.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposed development would fill an existing gap and consolidate the built form along Mangrove Road. Policy HERT5 requires the provision of a public amenity green space between the development and Hagsdell Stream in order to allow for the preservation of that part of the Hertford Green Finger. While there are no specific wildlife designations covering this site, consideration of wildlife issues would be taken into account at the planning application stage in relation to other policies in the plan, particularly emerging Policy NE3 Species and Habitats.</p>
7.161	It seems perverse to remove HERT5 from the Green Belt and yet keep existing development at Mangrove Drive within the Green Belt.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft Plan already proposes the removal of both Mangrove Drive and Oak Grove from the Green Belt as part of the review of boundaries in this area.</p>
7.162	The semi-rural nature of this part of Hertford will be lost if this development goes ahead.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposed development is limited in nature and would fill an existing gap and consolidate the built form along Mangrove Road. Policy HERT5 requires the provision of a public amenity green space between the development and Hagsdell Stream in order to allow for the preservation of that part of the Hertford Green Finger. It is therefore considered that any impact on the character of this part of Hertford would be limited.</p>
7.163	Should the development go ahead, consideration should be given to the type and mix of housing to be delivered. A repeat of the Ashbourne Gardens development is not appropriate in this area.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Policy HERT5 requires the provision of a range of dwelling type and mix in accordance with the provisions of Policy HOU1. This would be agreed through the planning application process.</p>
7.164	HCC suggests that development in this area is unlikely to lead to any major issues on the local road network, beyond those that can be dealt with as part of a planning application. A financial contribution towards a mitigation scheme for the A414 may be required.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Noted. Any requirements regarding the provision of financial contributions would be agreed at the planning application stage.</p>

Issue Number	Issue	Officer Response
7.165	The plan needs to ensure that development in this location will not deteriorate the quality of the Green Fingers.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The proposed development would fill an existing gap and consolidate the built form along Mangrove Road. Policy HERT5 requires the provision of a public amenity green space between the development and Hagsdell Stream in order to allow for the preservation of that part of the Hertford Green Finger. It is therefore considered that any impact on the Green Finger, and indeed the Green Belt, would be limited.</p>
7.166	Objection to development in this location due to increased risk of flooding, traffic implications, loss of open country views for residents of Queens Road, loss of open space and insufficient provision of school places.	<p><b>No amendment to Plan in response to this issue</b></p> <p>As the site lies outside Flood Zones 2 or 3, the risk of river (fluvial) flooding is considered to be low. In respect of surface water or drainage flooding, the development would need to include sustainable drainage measures in accordance with the Council's Strategic Flood Risk Assessment, which would decrease the risk of flooding rather than exacerbate it. In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage.</p> <p>Issues concerning traffic are considered to be mitigatable and would be addressed at the planning application stage.</p> <p>The potential loss of a private view for residents of Queens Road is a not a planning matter and therefore could not be taken into account in the determination of any future application. However, other policies in the Plan should ensure that a high quality of design would be delivered. While primary education provision in Hertford was an issue at the time of consultation in 2014, the situation has been significantly improved by Simon Balle School becoming an 'all through' facility from September 2015 and this is located within 300m of the site. The Council will continue to work closely with HCC in order to ensure that the educational needs arising from the proposed level of development in Hertford can be met throughout the plan period.</p>
7.167	There should be a more detailed plan of the site showing the proposed location of housing and green space etc.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan is a strategic document which seeks to allocate sites for development. The layout of any proposed development would be agreed through the planning application process.</p>
7.168	There will be an increased risk of flooding as the drainage is not adequate.	<p><b>No amendment to Plan in response to this issue</b></p> <p>As the site lies outside Flood Zones 2 or 3, the risk of river (fluvial) flooding is considered to be low. In respect of surface water or drainage flooding, the development would need to include sustainable drainage measures in accordance with the Council's Strategic Flood Risk Assessment, which would decrease the risk of flooding rather than exacerbate it. In addition, development proposals would need to demonstrate that drainage issues had been adequately addressed at the planning application stage.</p>

Issue Number	Issue	Officer Response
7.169	Hertford Town Council raises concerns that development should not get too close to the Ashbourne Brook.	<b>No amendment to Plan in response to this issue</b> Policy HERT5 requires that development would be confined to the upper level and that there should be the provision of a public amenity green space between the development and Hagsdell Stream in order to allow for the preservation of that part of the Hertford Green Finger.
7.169a	Hertford Town Council raises concerns that Mangrove School was already under enormous pressure from Simon Balle School. The access is not good, therefore any housing should be low density.	<b>No amendment to Plan in response to this issue</b> HCC suggests that development in this area is unlikely to lead to any major issues on the local road network, beyond those that can be mitigated through the planning application process.
7.170	The area between the development and the Hagsdell stream should not be used as amenity greenspace due to various reasons including: wildlife natural habitat concerns; increased public access would threaten security of existing properties/crime potential; noise and nuisance; risk of fire from portable barbeques; potential damage to trees and vegetation; light pollution; litter polluting the river; potential for drug users in the area; parking pressures; and likelihood of the future development of the amenity area. It is currently natural landscape and should not be changed.	<b>No amendment to Plan in response to this issue</b> Some of the issues raised are not planning matters and cannot be taken into account in the plan making process. The area would provide additional amenity space to the area, which would ensure that the gap between the development and Hagsdell stream is maintained. It is not intended that the area would be lit. The area which would form the amenity greenspace does not have a wildlife site designation; however, public access to this location should not preclude the continuance of wildlife activity in the area. It is also considered that, as this area would not become an equipped play area or park, and would simply be an informal open space with public access (as in many other parts of the town), it is unlikely that the negative aspects mentioned in the response would come to fruition.
7.171	HCC suggests that further investigations regarding the possible presence of minerals deposits are required. Such resources could be used during construction.	<b>Proposed amendment to Plan in response to this issue</b> In respect of potential mineral extraction on site, wording should be added to the Policy HERT5 to detail this potential requirement.
7.172	English Heritage indicates that the site lies within the conservation area and that this should be referred to in the policy. The policy should also require that the development protects the setting of adjacent heritage assets including Balls Park.	<b>Proposed amendment to Plan in response to this issue</b> While at the consultation stage, the site lay within the Conservation Area, a review of the Conservation Area boundaries for Hertford is currently underway which proposes the removal of both this and the adjoining site from that designation. Should this be confirmed then no purpose would be served by including reference to this designation; however, it is considered appropriate that wording be included in the policy to reflect adjacent heritage assets.
7.173	There is nothing in the document that mentions the need for a new primary school at Simon Balle school.	<b>No amendment to Plan in response to this issue</b> Since the Preferred Options consultation, a planning application to allow Simon Balle to become an 'all through' facility was approved in 2014 and opened in September 2015,

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		which makes the response redundant.
7.174	Thames Water does not envisage infrastructure concerns on this site.	<b>No amendment to Plan in response to this issue</b> Noted.
7.175	Christ's Hospital Foundation supports the proposed allocation of the site but notes that it is capable of delivering in excess of 80 dwellings.	<b>No amendment to Plan in response to this issue</b> The number of dwellings proposed in the policy is based on the developable area considered likely, taking into account both the infrastructure expected to be delivered and the local context. The consideration of the potential for the site to deliver any additional dwellings would take place through the planning application process.
7.176	HCC Minerals consider that there may be the opportunity to extract resources for use on site during development.	<b>Proposed amendment to Plan in response to this issue</b> Policy to be amended to include this matter.
<b>Employment in Hertford</b>		
7.177	The existing employment provision in Hertford needs to be maintained to cater for the needs of new development.	<b>No amendment to Plan in response to this issue</b> Agreed. The 2016 Hertford and Ware Employment Study concludes that "In the light of the significant reduction of employment floorspace over recent years, and the fact that there is very limited supply of available space, Wessex Economics would recommend that EHDC seek to prevent further loss of employment land in Hertford and Ware in the short to medium term". The draft District Plan therefore seeks to retain existing employment provision in Hertford.
7.178	It is not economically viable to maintain and modernise the Caxton Hill employment area. The most appropriate option is to consolidate these uses on more appropriate sites elsewhere in Hertford and the surrounding areas. The site should be allocated for housing.	<b>No amendment to Plan in response to this issue</b> The District Plan seeks to maintain and enhance existing employment space where possible. The Council's 2016 Hertford and Ware Employment Study technical evidence base suggests that the Caxton Hill estate has the potential to continue its employment role in Hertford, subject to modernisation and refurbishment, access and visibility. Furthermore, the Study concludes that "In the light of the significant reduction of employment floorspace over recent years, and the fact that there is very limited supply of available space, Wessex Economics would recommend that EHDC seek to prevent further loss of employment land in Hertford and Ware in the short to medium term". Therefore, it is considered that Caxton Hill should be retained for employment uses.
7.179	The need for increase in employment areas in Hertford is not justified. There is a reduced demand for business accommodation.	<b>No amendment to Plan in response to this issue</b> There is only one new Employment Area proposed for Hertford in the Pegs Lane/Hale Road/Gascoyne Way area. This does not seek to provide new land for employment uses, but rather to recognise and protect the existing employment base which exists in the area



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		and formally designate this through the policy. However, recent permissions for residential development in the area mean that Officers consider that the area proposed in the Preferred Options consultation should be reduced.
7.180	Objection to the continued use of Caxton Hill for employment purposes. The site has poor access and it is uneconomic to maintain. The site should be redeveloped for residential use.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The District Plan seeks to maintain and enhance existing employment space where possible. The Council's 2016 Hertford and Ware Employment Study technical evidence base suggests that the Caxton Hill estate has the potential to continue its employment role in Hertford, subject to modernisation and refurbishment, access and visibility. Furthermore, the Study concludes that "In the light of the significant reduction of employment floorspace over recent years, and the fact that there is very limited supply of available space, Wessex Economics would recommend that EHDC seek to prevent further loss of employment land in Hertford and Ware in the short to medium term". Therefore, it is considered that Caxton Hill should be retained for employment uses.</p>
7.181	Objection to the redevelopment of Caxton Hill for residential purposes.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Agreed. The District Plan seeks to maintain and enhance existing employment space where possible. The Council's 2016 Hertford and Ware Employment Study technical evidence base suggests that the Caxton Hill estate has the potential to continue its employment role in Hertford, subject to modernisation and refurbishment, access and visibility. Furthermore, the Study concludes that "In the light of the significant reduction of employment floorspace over recent years, and the fact that there is very limited supply of available space, Wessex Economics would recommend that EHDC seek to prevent further loss of employment land in Hertford and Ware in the short to medium term". Therefore, it is considered that Caxton Hill should be retained for employment uses.</p>
7.182	Sovereign House should not be included within the proposed Employment Area at Pegs Lane.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Since the Preferred Options consultation, permission has been granted (subject to S.106) for a development of 57 units of Class C2 accommodation and 24 units of Class C3 Sheltered Accommodation. The scheme will introduce employment of 17 equivalent full time jobs, in a mix of full time and part time working. As a mixed use site, the development would fall within the criteria of the draft policy and it is considered that the site should therefore be included within the HERT6 designation.</p>
7.183	HCC property and Hertford Civic Society object to County Hall being considered as part of the Pegs Lane, Gascoyne Way, Hale Road employment area. If the County Hall is to be included then the boundary should be amended so Leahoe is excluded as this	<p><b>No amendment to Plan in response to this issue</b></p> <p>As HCC's offices at County Hall represent the base of the largest single employer in Hertford, it is not considered inappropriate for its use to be recognised in an employment policy context. The policy does not seek to provide new land for employment uses, but rather to recognise and protect the existing employment base which exists in the area and</p>

Issue Number	Issue	Officer Response
	building is vacant.	formally designate this through the policy. Policy HERT6 clearly states that the area would be reserved for mixed uses and therefore it is not considered that the inclusion of Leahoe within the area would be inconsistent with that approach.
7.184	Mead Lane should not be considered in HERT6, HERT2 should set out land uses within the area.	<b>No amendment to Plan in response to this issue</b> Policy HERT2 sets out the parameters for mixed use development within a discrete area (covered by the Mead Lane Urban Design Framework) which lies within the overall Employment Area. The principles applying to proposed development within the Employment Area as a whole fall primarily under district-wide Policy EDE1, which sets the context for its Employment Area designation and Policy HERT6 translates this to the settlement level. Restricting Mead Lane solely to Policy HERT2 could undermine the Employment Area designation for this site and also cause confusion for readers of the Plan.
<b>Retail in Hertford</b>		
7.185	Retail is being lost in the town and Council policies regarding car parking and a failure to oppose copycat restaurant proposals are making the situation worse. The outcome is that people have to travel further afield which causes congestion and is not sustainable.	<b>No amendment to Plan in response to this issue</b> The draft District Plan seeks to address the loss of retail units within the main town centres. Notwithstanding permitted development rights set out in The Town and Country Planning (General Permitted Development) (England) Order 2015, policies RTC3 and RTC4 seek to protect the vitality and viability of Primary and Secondary Shopping Areas. In 2014, the Council, working together with HCC and Hertford Town Council, commissioned the Hertford Town Centre Urban Design Strategy for the town centre. This Strategy, which was finalised in February 2016 and agreed by all three councils, will inform future development of and movement within the town centre, seek to revitalise commercial activity, and secure the long-term health of its shopping areas.
7.186	The market town character of Hertford has been destroyed by poor retail planning. There is very little retail and too many cafes, restaurants.	<b>No amendment to Plan in response to this issue</b> In part as a response to concerns about the economic vitality of Hertford Town Centre, in 2014, the Council, working together with HCC and Hertford Town Council, commissioned the Hertford Town Centre Urban Design Strategy (HTCUDS) for the town centre. This Strategy, which was finalised in February 2016 and agreed by all three councils, will inform future development of and movement within the town centre, seek to revitalise commercial activity, and secure the long-term health of its shopping areas.
7.187	The town suffers from a number of vacant retail premises and this could be exacerbated if Waitrose leave.	<b>No amendment to Plan in response to this issue</b> In part as a response to concerns about the economic vitality of Hertford Town Centre, in 2014, the Council, working together with HCC and Hertford Town Council, commissioned the Hertford Town Centre Urban Design Strategy (HTCUDS) for the town centre. This

Issue Number	Issue	Officer Response
		Strategy, which was finalised in February 2016 and agreed by all three councils, will inform future development of and movement within the town centre, seek to revitalise commercial activity, and secure the long-term health of its shopping areas. Part of the HTCUDS seeks to identify an appropriate form of redevelopment for the Bircherley Green centre.
7.188	The town centre has a unique character and should not be spoilt by introducing chain store malls. There should be a reduction in business rates to encourage more diversification in the retail offer.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The unique historic character of Hertford is recognised in the draft District Plan. The Plan does not specifically propose the provision of malls in the town; however, the Hertford Town Centre Urban Design Strategy does seek to identify an appropriate form of redevelopment for the Bircherley Green centre.</p> <p>The Council seeks to support local businesses through various initiatives; however, the issue of business rates falls outside the remit of the District Plan.</p>
7.189	There needs to be a more effective retail strategy to help shops stay open. There is no strategy for the town centre or for reducing the number of empty shops.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft District Plan seeks to address the loss of retail units within the main town centres. Notwithstanding permitted development rights set out in The Town and Country Planning (General Permitted Development) (England) Order 2015, policies RTC3 and RTC4 seek to protect the vitality and viability of Primary and Secondary Shopping Areas.</p> <p>In 2014, the Council, working together with HCC and Hertford Town Council, commissioned the Hertford Town Centre Urban Design Strategy for the town centre. This Strategy, which was finalised in February 2016 and agreed by all three councils, will inform future development of and movement within the town centre, seek to revitalise commercial activity, and secure the long-term health of its shopping areas.</p>
7.190	Hertford Town Council and others would like to see a Saturation Policy included within the Plan to ensure that there is a mechanism for turning down applications for further shops of the same nature. More could be done to develop the retail 'character' of Hertford. There are a disproportionate number of hairdressers and beauty salons.	<p><b>No amendment to Plan in response to this issue</b></p> <p>The draft District Plan seeks to address the loss of retail units within the main town centres. Notwithstanding permitted development rights set out in The Town and Country Planning (General Permitted Development) (England) Order 2015, policies RTC3 and RTC4 seek to protect the vitality and viability of Primary and Secondary Shopping Areas.</p> <p>In 2014, the Council, working together with HCC and Hertford Town Council, commissioned the Hertford Town Centre Urban Design Strategy for the town centre. This Strategy, which was finalised in February 2016 and agreed by all three councils, will inform future development of and movement within the town centre, seek to revitalise commercial activity, and secure the long-term health of its shopping areas.</p>
7.191	Diageo and Wrenbridge recommend that greater emphasis is placed on improving the town centre and that the historic character of the town should not prevent this. Redevelopment of the Bircherley Green	<p><b>No amendment to Plan in response to this issue</b></p> <p>In 2014, the Council, working together with HCC and Hertford Town Council, commissioned the Hertford Town Centre Urban Design Strategy for the town centre. This Strategy, which was finalised in February 2016 and agreed by all three councils, sets a framework which will</p>

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	Shopping Centre offers an opportunity to achieve this through the provision of larger, more modern retail units, an enhanced character and better links to the river and the wider town centre.	inform future development of and movement within the town centre, seek to revitalise commercial activity, and secure the long-term health of its shopping areas. A discrete section of the Strategy is provided on Bircherley Green and sets the parameters for development in that location.
7.192	Opposition to retail development which involves the demolition of historical buildings.	<b>No amendment to Plan in response to this issue</b> Noted. The Plan seeks to preserve and enhance the historic environment of the district. In particular, policies in the Heritage Assets chapter of the Plan (HA1, HA2 and HA4) would apply in this respect. It is not considered necessary to duplicate this district-wide policy on a settlement basis.
7.193	Hertford should not be expanding its retail function as many shops currently stand vacant.	<b>No amendment to Plan in response to this issue</b> The draft District Plan seeks to address the loss of retail units within the main town centres. Notwithstanding permitted development rights set out in The Town and Country Planning (General Permitted Development) (England) Order 2015, policies RTC3 and RTC4 seek to protect the vitality and viability of Primary and Secondary Shopping Areas. In 2014, the Council, working together with HCC and Hertford Town Council, commissioned the Hertford Town Centre Urban Design Strategy for the town centre. This Strategy, which was finalised in February 2016 and agreed by all three councils, will inform future development of and movement within the town centre, seek to revitalise commercial activity, and secure the long-term health of its shopping areas.
Leisure and Community Facilities in Hertford		
7.194	An alternative layout for the new primary school at Simon Balle School has been submitted.	<b>No amendment to Plan in response to this issue</b> A planning application to allow Simon Balle to become an 'all through' facility was approved in 2014 and this opened in September 2015.
7.195	There is no mention of providing facilities for children such as after school activities, play areas, sure start centres etc.	<b>No amendment to Plan in response to this issue</b> The proposed housing allocation policies for the developments West and North of Hertford include a requirement to provide public amenity green space and play areas. The provision of after school activities is the responsibility of individual schools and falls outside of the remit of the District Plan.
7.196	Hertford Town Council and others state that new space for play areas should be allocated in the District Plan.	<b>No amendment to Plan in response to this issue</b> The larger allocations contained within the draft Plan require provision of public amenity greenspace and play areas as part of development proposals for these sites.
7.196a	Hertford Town Council and others state that new allotment and cemetery land should be allocated in the District Plan.	<b>No amendment to Plan in response to this issue</b> The Council does not currently have evidence that an identified need for such facilities exists in Hertford. However, should such need be identified in the future then

Issue Number	Issue	Officer Response
		the emerging Open Space, Sports and Recreation Assessment will provide guidance on how any such facilities should be provided.
7.197	There is no provision for new places for public religious worship. Future needs must be provided for.	<p><b>No amendment to Plan in response to this issue</b></p> <p>While there is no specific requirement for places of religious worship, developments brought forward within the allocations in Hertford, and elsewhere in the district, will be required to make financial contributions towards the provision of new or enhanced community facilities.</p>
7.198	Sport England states that the acknowledgement of the under provision of junior football and mini soccer pitches is welcomed. However objection is made to the lack of any site allocations for such uses. It is unlikely that residential led development will be large enough to provide viable on-site sports facilities. Paragraph 7.5.2 is just an aspiration rather than providing a plan led approach to addressing identified needs. The paragraph also fails to identify the indoor sports facility needs that have been identified in Hertford.	<p><b>Proposed amendment to Plan in response to this issue</b></p> <p>The paragraph refers to the need to provide additional facilities across the Hertford and Ware area and is not limited solely to Hertford. It is not anticipated that every allocation would be required to make specific on-site provision, but that where this is not the case contributions would be required towards identified formal sport provision needs, which could relate to indoor and/or outdoor facilities, as appropriate. It is feasible that in some cases provision may potentially be achievable via shared use facility arrangements (e.g. utilising existing schools' facilities) rather than standalone new provision, but this would be likely to require contributions to ensure facilitation. In respect of the evidence underpinning the identification of needs, it should be noted that this is now considered to be out of date and work is currently ongoing in the preparation of an emerging Open Space, Sports and Recreation Assessment. The updated evidence will inform the identification of needs going forward and the level and location of provision required across the Hertford and Ware area, which would be applied at the planning application stage. In case of any misinterpretation of in respect of whether all sites would be required to make on site provision, it is therefore proposed that the text be amended to acknowledge the potential need for indoor provision in addition to outdoor facilities and to clarify that contributions would be required towards on or off site provision.</p>
7.199	Support for this paragraph (7.5.4) in view of proposed new developments.	<p><b>No amendment to Plan in response to this issue</b></p> <p>Support noted and welcomed.</p>