

Essential Reference Paper 'B' - Response to Regulation 16 Consultation on the
Bishop's Stortford Neighbourhood Plan All Saints, Central, South and Part of Thorley 2016-2032

Name	Organisation	Summary of Comments
Andrew Martin	Planning on behalf of Countryside Properties (CP) re Bishop Stortford South	<p>Policy HDP1: Restricts development of BS South until transport and parking provisions have been made at Goods Yard Site. This fails to have regard to national policy and advice and would not contribute to achieving sustainable development</p> <ul style="list-style-type: none"> • Para. 32 NPPF directs that development should only be refused where cumulative transport impacts are 'severe'. There is no evidence to suggest development of BS South would lead to severe traffic impacts therefore this requirement is inconsistent with national policy • Emerging District Plan does not seek to phase development or restrict early delivery of BS South but relies on this site to supplement housing land supply • Delay in delivery of Goods Yard site would could weaken EHDC housing land supply and delay delivery of a key strategic site <p>Suggested change: Paragraph b) to read: <i>"Development of Bishop's Stortford South will not be supported unless accompanied by the transport mitigation measures set out in Policy BSS4"</i></p> <p>Policy HDP3: Object to inclusion of Nationally Described Space Standards (NDSS), it does not have regard to national policy and guidance</p> <ul style="list-style-type: none"> • Emerging Plan does not contain policies with NDSS standards therefore HDP3 is not in conformity with the strategic plan • NPPG Para. 56-020 'three tests' to implement NDSS "Need, Vitality and Timing" have not been considered or consulted on in the emerging plan therefore there is no evidence base available to introduce NDSS requirements.

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		<p>Suggested change:</p> <p>Policy HDP3 be amended to read as follows: <i>“a) encourage the use of the Nationally Described Space Standards on internal space as set out in the DCLG Technical Housing Standards, or any guidance which explicitly supersedes it”</i></p> <p>Policy HDP4 is badly worded. Question how or why a developer would be expected to re-allocate house types after submission. Housing market is determined by demand.</p> <p>Suggested change: Amend Para. d) to read: <i>“d) Schemes of any size must consider the unfulfilled demand for bungalows, particularly for sites close to similar dwellings, for example the East Manor Links site. In this regard, the housing mix and proportion of bungalows proposed on suitable sites should seek to address the most up-to-date housing needs set out in the latest Strategic Housing Market Assessment (SHMA).”</i></p> <p>BS South is located opposite the existing Southern Country Park therefore it would be more appropriate to facilitate enhancements rather than provide a new meadow. Noted that EHDC's open space and biodiversity standards and suitable management plans will have to be met.</p> <p>Suggested change: Amend Para. e) to read: <i>“e) Major new development should include wildflower meadow areas as part of the green spaces provided on-site or facilitate off-site enhancements to existing green space to support new wildflower planting. These must be accompanied with a suitable management plan and funding to ensure long-term benefits for wildlife.”</i></p> <p>Policy GIP6: Para. b) 0.24 ha exceeds the requirement of 0.21ha per 1000 population in adopted local plan. No evidence to suggest a higher figure is required.</p>

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		<p>Suggested change: Amend Para. b) to read: <i>“b) For developments in excess of 500 dwellings (or groups of adjacent developments which together amount to more than 500 dwellings) it will be expected that land either on or immediately adjacent to the development site is provided and is prepared by the developers (including facilities, fencing, land preparation, soil improvement if required) and transferred to the allotment authority (currently the Town Council) at no cost. The provision of space for new allotments will be at the rate of 0.21 ha per 1,000 population. Vehicular access will be required and the site must be chosen accordingly.”</i></p> <p>Policy TP1: Object to 5% increased congestion test. This is contrary to NPPF para. 32. Part h) refers to 10% test of 'motor vehicle movements' rather than congestion or average journey times. The test of 'severe' is a matter for the applicant's Transport Assessment, which is then assessed by Highways during the application process.</p> <p>Suggested change: Amend Para. b) to read: <i>“In the event that the Transport Assessment shows a significant increase in congestion or average journey times, mitigation measures should be identified and implemented to improve the transport network. However, development should only be refused on transport grounds where the residual cumulative impacts of development should only be refused on transport grounds where the residual cumulative impacts of development would be 'severe'.”</i></p> <p>Policy TP1 parts a), f) and g) refer to key routes to be assessed for 'significant' development proposals. This matter is for the Highway Authority to determine.</p> <p>Suggested change: Amend Para. f) and g) to read:</p>

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		<p><i>“f) The restrictions and traffic carrying capacity of present highways into/out of town (Rye Street, Hadham Road, Stansted Road, Great Hadham Road/Windhill, London Road, Thorley Street, Haymeads Lane, Dunmow Road, Hallingbury Road, and on the Causeway and Hockerill Street) should be recognised, modelled, and tested appropriately, subject to agreement with the Highway Authority.”</i></p> <p><i>“g) Where appropriate, due to the location or impact of a development, and subject to agreement with the Highway Authority, the following routes should also be considered as though they were specified in paragraph f): Beldams Lane, Linkside Road, Haymeads Lane, Pig Lane, South Street Station Road, Dane Street and other roads in the vicinity of the development.</i></p> <p>Policy TP8: Appears to use standards from adopted Local Plan. EHDC have since revised 'Vehicle Parking Standards' July 2015, which should be used for planning applications.</p> <p>Suggested change: Amend Paragraph a) to read:</p> <p><i>“a) Proposals for new developments will have adequate off-street car and cycle parking provision to meet current and reasonable assessed future needs. Vehicle parking will be expected at a level of:</i></p> <ul style="list-style-type: none"> <i>• 1.50 spaces per one-bed dwelling;</i> <i>• 2.00 spaces per two-bed dwelling;</i> <i>• 2.50 spaces per three-bed dwelling; and</i> <i>• 3.00 spaces per four or more bed dwelling</i> <p><i>In Zone 2 car parking at 25% to 100% of the above standard should be considered acceptable, in Zone 3 this is 50% to 100% and in Zone 4 this is 75% to 100%”</i></p> <p><i>Delete paragraph f) in its entirety.</i></p> <p>Para. 4.9.1.8: EHDC's Green Belt Technical Review do not reflect balanced findings of Report. Para. 184 of NPPF NPs</p>

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		<p>should not promote less development than the development plan and be aligned with strategic needs of the wider area.</p> <p>Suggested change: Amend paragraph 4.9.1.8 to read: <i>“In September 2015 the District Council published a Green Belt Technical Review (prepared by Peter Brett Associates) that found the suitability of the site for release for potential development to be ‘low’. However, this conclusion should be considered in the context of the wider findings set out in the review. For example, the review found that the suitability of the District Council’s four other major growth locations (i.e. north of Harlow, north of Ware. East of Ware and east of Welwyn) for release for potential development to be ‘very low’. The review also recognises that ‘the bypass beyond [Bishops Stortford South] provides a well-defined alternative Green Belt boundary which could , coupled with strategic planting limit and contain growth’</i></p> <p><i>Furthermore, officers confirmed at the 10th September District Planning Executive Panel meeting that the Green Belt Review’s conclusions are recommendations only and need to be considered ‘on balance alongside all other technical evidence presented through the Plan-making process.’ Officers also noted that the Review ‘makes clear recommendations where development could be acceptable even in parcels which have low suitability as an area of search, if properly planned, in a manner which respects the landscape and creates reinforces boundaries’.</i></p> <p>Para. 4.9.1.9: Is overtly anti-development towards BS South and does not comply with expectations at Para. 184 of NPPF nor paras. 41-044” of the NPPG which expects neighbourhood plans to “...plan positively to support local development...”</p> <p>Suggested change: Amend paragraph 4.9.1.9 to read: <i>“The District Council is currently reviewing the extent of the Green Belt in East Herts and is considering altering Green Belt boundaries in a number of locations, including Bishop’s Stortford South. This is in</i></p>

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		<p><i>accordance with the provisions set out in paragraph 83 of the NPPF. However the Neighbourhood Plan has no influence over this decision. It can deal only with the consequences should it occur."</i></p> <p>Retention of all view of the open countryside to the east and south from the centre of BS South site. As set out in comments re Policy BSS5, it is unrealistic to maintain all views of the open countryside from the proposed development site. Seeking to maintain Key views would be more achievable and not constrain sustainable development.</p> <p>Suggested change: Amend paragraph c) to read: <i>"c) Design and layout should ensure that key views of the open countryside to the east and south are maintained from focal locations (for example major community facilities) near the centre of the development."</i></p> <p>Policy BSS4: Restricts vehicular access to BS South other than from the existing roundabouts from east and west. The Neighbourhood Plan does not present any evidence in support of this and the matter of access should be discussed with the Highway Authority, EHDC and the applicant. Nor does the policy does have regard to national policy and advice</p> <p>Suggested change: Amend paragraph c) to read: <i>"c) The principal vehicular access points to the site will be discussed and agreed with the Local Highway Authority and East Herts District Council. Pedestrians and cyclists should have access to the development from Whittington Way."</i></p> <p>Access Roads: Policy BSS4 Paragraphs e) and f) proposes separate access roads for the business park and the secondary school along with the restricting site access in paragraph c) would result in no vehicular access for the 750 planned homes.</p>

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		<p>Suggested changes: Amend paragraph e) to read: <i>“e) The access to any proposed business park should be via the development’s principal road network to avoid any extra vehicular movements within the proposed residential areas.”</i></p> <p>Amend paragraph f) to read: <i>“f) The location and access to new educational facilities should not cause congestion within the development and surrounding areas. Any possible new secondary school should be accessible via the development’s principal road network, without traversing the existing or proposed residential areas. Buses, coaches and cars must have an adequately sized, dedicated off road drop-off and pick-up area”</i></p> <p>Policy BSS5: Expects development to maintain the open aspect and not obstruct views from with built structures and accommodate a 10 metre wide wildlife corridor either side of the Right of Way. CP believes Policy BSS4 to be over restrictive and would not achieve sustainable development. Site development will alter some views, but the focus should be to protect and enhance key views and minimise/mitigate visual impacts. Also the 10 metre buffer zone may not be the most sensitive ecological solution to preserve flora and fauna therefore the 10 metre buffer is applied as a guide only.</p> <p>Suggested changes: Amend paragraph a) to read: <i>The Hertfordshire Way crosses this site and its open aspect and key views should be maintained, wherever feasible. This is used as a bridleway and the minimum width should be 3 metres. Fencing adjacent to the footpath, if any, must be low visual impact and the design and layout such that the open aspect is maintained and key views are not obstructed by built structures. To protect the existing flora and fauna a 10 metre wildlife corridor either side of the Right of Way should be maintained or other appropriate measures designed into any development, to protect and enhance biodiversity.”</i></p> <p>Policy BSS5:</p>

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		<p>CP object to the 10 year maintenance of Hertfordshire Way. This as maintenance is undertaken by The Friends of Hertfordshire Way</p> <p>Suggested changes: Amend paragraph b) to read: <i>“b) Maintenance of the Hertfordshire Way is the responsibility of The Friends of the Hertfordshire Way. ”</i></p> <p>Policy HDP5: Wheelchair accessible and adaptable CP seek evidence to support the need for a 20% requirement and if not available that the policy is amended to 3%</p> <p>Suggested changes: Amend paragraph a) to read: <i>“a) New housing shall be of a type and size which is capable of meeting the changing needs of residents over their lifetimes, is accessible to those with limited mobility and capable of adaptation for residents who are wheelchair users. At least 3% of homes shall be built to be ‘Wheelchair Adaptable’ as defined by Building Regulations M(2) or whatever standard supersedes it.”</i></p>
John Rhodes	Bishop's Stortford Civic Federation	<p>It is not appropriate to rely on SHMA to determine the housing needs of East Herts or the distribution among settlements (See previous objections to the District Plan).</p> <p>Suggested changes: <i>reference to the SHMA in policy HDP1 a) should be deleted, with support for new residential development being confined simply to developments in accordance with the Local and Neighbourhood plans currently in force.</i></p> <p>No doubt as to the town's continuing hostility to the proposal for BS South</p> <p>Should not relocate the Boys High School as there will be sufficient demand for a new school and this will be only available site (See District Plan objections paras. 69-79)</p>

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		<p>Suggested change: <i>Section 4.10 of the plan should be deleted</i></p> <p>Para 4.1.5.4: Transport to Stansted Airport With the proposed increase of passenger numbers likely to take place 24 increasing to 35 million passengers per annum this will put additional pressure on transport systems.</p> <p>Suggested change: <i>Policy TP5 should be enhanced to include a specific reference to the need to improve the local bus services serving the airport as a result of the prospective expansion of both the town and the airport.</i></p> <p>Summary of District Plan Objections The plan does not satisfy the tests of 'soundness' required by NPPF</p> <p>Development History: Bishop's Stortford has had— a 66% increase in population since 1981 and 40% of all East Herts' new housing. But this has been accompanied by a loss of public services and no improvements in the road network to support such growth. - We have no reason to suppose that this plan will differ from any of its predecessors in determining that housing should come first and that supporting infrastructure, if any, can tag along later.</p> <p>Housing Demand: Relying on the SHMA will merely replace top down centrally determined forecasts Prejudice commercial housebuilders favoured house types Ignores potential impact of Brexit on migration and housing market in South East The location and volume of new housing influence migration patterns.</p> <p>Housing Distribution in East Herts The development plan proposes a similar historic folly of unbalanced development in Bishop's Stortford and restricting growth in other rural settlements.</p>

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		<p>The claimed demand for 4349 new homes for Bishop's Stortford nor the restriction of village development to 500 new homes is justified by population forecasts, which point to more housing in villages and less in Bishop's Stortford</p> <p>Unsustainability of Distribution Model Villages need growth, broadband reduces travel needs, villages need housing for various age groups in society. Endless expansion of towns is equally unsustainable, creating dormitory suburbs, car dependence. Bishop's Stortford north and the development of brownfield land should be the extent of growth.</p> <p>Deliverability Proposed housing completion rates represent a 40% increase over the average for the last 25 years (125% increase in first 5 years) Development change will require changes in procurement and /or taxation of development land values which are not in prospect.</p> <p>Zoning land for housing, on the basis of unrealistic expectations about the ability of the industry to deliver, causes blight and discredits the planning system.</p> <p>Green Belt Nearly half allocated housing sites are in GB, Ministers state that housing is not an exceptional circumstance to review GB boundaries Rural areas beyond the GB should not have policies as restrictive as the GB.</p> <p>Bishop's Stortford South: Strongly oppose removal of the GB Previous local plan retained the GB, school campus was rejected by EHDC, independent Inspector and the Secretary of State. Deemed unsuitable for development in EHDC GB Review.</p> <p>Proposals for development at Gilston, Sawbridgeworth and Uttlesford, would create a ribbon of development from Harlow to Stansted Mountfitchet. Planning should avoid mistakes of past not compound</p>

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		<p>them.</p> <p>Alternative Scenarios We suggest that that the allocation to Bishop's Stortford should be reduced by 1000 dwellings, and that either the overall total of 18040 dwellings in the plan should be reduced by 1000 to a slightly more realistic number, and/or 1000 additional dwellings should be distributed among the villages.</p> <p>Detailed Changes to the Plan</p> <ul style="list-style-type: none"> - Our suggestions are set out paras 63-84 of the full note of our objections. - We wish to highlight here our concerns about secondary education in the town and policy BISH6. If the plan (including development of BSS) remains unchanged, it will create a demand for 13 FE of additional secondary school places. - HCC have firm plans in place for a new school of only 6 FE of additional places (at BSN). They would like to provide the balance by expanding existing schools but there is no certainty that this is feasible or that the existing schools would be willing to agree to it. - Moving the Boys High School of itself creates no extra places. An entirely new school might be needed and BSS would provide the only suitable site for it. - If BSS remains in the Green Belt, there would be no question of the High School moving to it. If the plan remains unchanged and BSS is developed, the High School should stay on its present site. Policy BISH6 should therefore be deleted. <p>Conclusion The SHMA should inform, not prescribe, the volume and distribution of housing in the district The plan may not deliver appropriate infrastructure Putting nearly half the housing proposed on GB, adding dormitory suburbs to the main urban settlements and strangling development in the villages is not the most appropriate strategy for the district. The plan is not deliverable, development rates are above any previous rates Plan is not consistent with national policies, does not empower local communities, protect GB or sustainable.</p>

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Claire McLean	Canal and River Trust	<p>Page 10: The Trust would encourage the development of a mooring strategy in the River Stort, helping to create a destination for visiting boaters, encourage greater use of the waterway for moorings and other leisure activities.</p> <p>Suggested change: <i>Neighbourhood Plan could include a supportive policy for moorings along the River Stort. We would also encourage the development of a mooring strategy in the area.</i></p> <p>3.9.2 Objectives The Trust supports these objectives</p> <p>Policy GIP2 The Trust acknowledge reference to the Trust</p> <p>Policy TP4 The Trust supports the ambition to develop a connected town for pedestrians and cyclists</p> <ul style="list-style-type: none"> • The Canal and River Trust would assess any proposal in terms of need and impact on the character, appearance and historic asset of the river. • As the Trust is landowner, any new crossing would require consent and a commercial agreement and then approval from the Secretary of State. Crossings need to avoid hindering navigation. • Improvements to the River Stort footpath/towpath including the enhancement of this route for both leisure and utility use. <p>The Goods Yard Support the objective. Moorings could take the form of visitor moorings with facilities (refuse, water, and potentially electricity and pump out). They could also include residential or long term leisure moorings, or commercial moorings, which would help provide surveillance on the waterspace and towpaths, and bring animation and activity, connecting the local community with this special asset.</p>

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		<p>Support for: GY1 – Improved public realm and reference to</p> <ul style="list-style-type: none"> • “Continuous public access to an active river frontage with features such as cafes, • recreational areas and moorings to encourage engagement with the river.” <p>Other Matters Building heights adjacent to the river need to be carefully considered, particularly in southern part of the site to avoid:</p> <ul style="list-style-type: none"> • overshadowing the towpath and waterspace, having an adverse impact on its amenity value. • loss of light which would impact on the use of solar panels, which many boats make good use of, increasing reliance on fuel burning stoves, causing potential conflict with new canal side residents • overshadowing which may have impacts on the canal as an important ecological resource <p>Suggested change:</p> <ul style="list-style-type: none"> • <i>Request that development proposals be required to assess potential overshadowing impacts on the canal and its towpath.</i> • <i>Tall buildings close to the canal can also affect wind microclimate and can affect boats trying to navigate past.</i> • <i>Request that development proposals be required to consider this impact as part of their environmental assessments.</i> <p>Heating and cooling Water can be more efficient than air source pumps to heat and cool buildings. The local plan should have reference to this for developers who wish to explore the technology</p> <p>Suggested changes:</p> <ul style="list-style-type: none"> • Developments requiring Water based heating and cooling technologies will be welcomed along the waterfront. Please contact the Canal and River Trust, to discuss initiatives. <p>Surface Water Drainage</p>

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		<p>Suggested changes: <i>Developments should be required to explore the potential for the river to contribute towards surface water drainage networks subject to agreement with the Canal and River Trust.</i></p> <p>Lighting Bats use the river environment as a feeding corridor, retaining the river as a dark corridor, is very important. Any new bridges (subject to consent from the Trust) should include lighting over the towpath for pedestrians and cyclists using the towpath at dusk and dawn, but we would otherwise request that no lighting from new developments should spill over the waterspace.</p> <p>Pre-application advice: Suggested changes Please insert:</p> <ul style="list-style-type: none"> • Developers are advised to seek pre-application advice from the Canal & River Trust. • Town and Country Planning Association's Policy Advice note: Inland Waterways (2009) is a good reference guide for potential development. • Especially: Appendix 1 – 'Water proofing of planning policy': • https://www.thenbs.com/PublicationIndex/documents/details?Pub=TCPA&DocID=294166
Richard Agnew	Gladman Developments Ltd.	<p>Quote Para. 173 of the Framework and question the viability of proposed development and hence the deliverability of sites. Policies should be concise and precise, Gladman contend that BSNP policies are too restrictive.</p> <p>Policy HDP1 The Framework encourages the effective use of previously developed land. It does not prioritise it. As the GB surrounds the built up area, if EHDC released GB land this policy would be out of date.</p> <p>Conclusion Neighbourhood plans are a tool for local communities to shape future development, but NP must be consistent with national policy and the strategic requirements of the policies for the wider area. Gladman is concerned that the use of specific policies as detailed in this response are not consistent with</p>

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		<p>basic conditions (a) and (d), as they lack they are too prescriptive and restrictive bringing in questions of viability towards development and therefore deliverability.</p>
	HCC Property	<p>Suggested change: Amend 4.4.3.3 to read: <i>“ The location of new schools locations together with the access arrangements should <u>seek to</u> minimise vehicular congestion and traffic impact. New developments must be informed by travel plans which include measures to encourage the use of transport other than private cars.</i></p> <p>EP5 – Travel plans The location and access arrangements of new schools should <u>seek to</u> minimise vehicular congestion and traffic impact. Proposals which incorporate travel plans that include measures to encourage the use of transport other than private cars will be supported.</p> <p>Suggested change: Amend 4.4.5.1 to read: <i>“Consultation feedback indicates dissatisfaction with the level of adult and vocational training available in the area and new. <u>New development should seek to</u> provides the opportunity to ensure that the appropriate facilities are available.”</i></p> <p>Amend 4.10.1.2 to read: <i>“ Should the Bishop’s Stortford High School site be vacated during the life of this plan then subject to a future planning application 150 houses could be built on this vacated site.”</i></p> <p>Amend 4.11.1.5 to read: <i>“With 50 houses and up to 500 extra people in this area there will be extra pressure on the existing already busy surrounding roads.”</i></p> <p>With regard to 4.10.1.2, 4.11.1.2 and 4.11.1.5, HCC has noticed that the housing numbers used in the Neighbourhood Plan are different to those in the East Herts Pre-Submission District Plan.</p>

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Monica Lynch		Comment on the need for pedestrianisation of South Street and reduction of rents
Paul Dean		<p>The SHMA does not take account of 'Brexit'. Brexit and London Mayor's drive to support affordable housing may result in a reduced need for housing in the area north-east of London, therefore the existing SHMA may result in overdevelopment, especially of Bishop's Stortford. 17% of houses planned for Bishop's Stortford are currently on Green Belt Land. There is a risk that this land will be used before brownfield sites are developed, resulting in unnecessary loss of open space.</p> <p>Policy HDP1 Suggested changes amend policy HDP1(a) to read:</p> <ul style="list-style-type: none"> • <i>"i) in keeping with the current SHMA, or any subsequent revisions to it, provided it is also part of a reasonably equitable distribution of residences across the District;</i> • <i>ii) on brownfield sites-which includes first floors and above of retail units (see BP8) and vacated industrial areas within the town or near the town centre (see BP9)</i> • <i>iii) only accept development on open/greenfield sites if it conforms with (i) and available brownfield sites have been or are under development"</i> <p>Transport Town is too hilly and hazardous for cyclists. More safe routes are needed.</p> <p>The Plan is weak on promoting better public transport links to and from airport, especially areas west of NP2 and should be strengthened</p> <p>The travel times stated are inaccurate and do not account for congestion and unreliability of public transport. The improvement of public transport particularly at night to reduce car use and congestion are not welcomed in the Plan, which particularly promotes the use of cars or taxis</p> <p>GP Surgeries Possible demand for GP surgeries to remain in town centre. Moving surgery from Haymeads will result in</p>

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		<p>traffic movements especially through Hockerill junction. The Plan does not account for the demand/benefits of surgeries remaining in present locations.</p> <p>Otherwise support for NP2 vision, development policies and objectives.</p>
William R Steele		Fully support the comments made by Bishop's Stortford Civic Federation
Robert Deanwood Consultant Planner	Amec Foster Wheeler E&I UK On behalf of National Grid	<p>The Intermediate / High Pressure Gas Pipeline Bishop's Stortford 7 BAR-IP Line falls within the Neighbourhood Plan Area. However, it does not interact with any of the proposed development sites in this Neighbourhood Plan.</p> <p>There may be Low Pressure (LP) and Medium Pressure (MP) Gas Distribution pipes present within proposed development sites, therefore consultation with the provider is required.</p>
David Glass	The Ramblers	<p>Bishop's Stortford South includes Public Rights of Way, Thorley 001, 003 and 004, and Bishop's Stortford 034.</p> <p>Suggested change: Amend 3.10.2 to add objective: <i>".... And neighbouring green spaces including the Public Rights of Way"</i></p> <p>Policy GIP3 Suggested change: <i>Developers of large developments should contribute towards the maintenance and enhancement of these important assets. Any development will impact of green spaces across Bishop's Stortford. The Goods Yard development will bring higher footfall on the River Stort and BS South will impact visitors to the Thorley Wash Nature Reserve and River Stort.</i></p>
Roy Warren	Sport England	<p>3.7.2 Sport, Leisure and community Objectives Proposed objectives are welcomed but another objective should be added.</p>

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		<p>Suggested change: <i>Existing sports facilities are in such high demand that they must be safeguarded unless replaced with at least equivalent facilities in a suitable location. This would be consistent with Sport England's planning objectives, paragraph 74 of NPPF and policy SLCP2 emerging East Herts District Plan.</i></p> <p>3.11.2 Bishop's Stortford High School Site and policy BSHS2</p> <p>Suggested change: <i>An additional objective which ensures that if the existing school closes and moves to a new site, that the existing sports and community facilities are adequately replaced on any new school site.</i></p> <p>Policy HDP3 – Design Standards Full support that all major developments will have to demonstrate how the Active Design principles have been met</p> <p>Policy GIP1 Local Green Spaces Welcomed</p> <p>Policy EP8 – Wide Community Use Supported and consistent with Paragraph 70 of NPPF/Policy CFLR7 of emerging District Plan</p> <p>Policy SLCP1 - Provision of additional outdoor sports facilities Broadly welcomed</p> <p>Policy SLCP2 – Development or Expansion of Multi-Purpose Facilities Broadly welcomed but: Suggested change: <i>Criterion (a) should make provision for supporting facilities in sustainable locations as well as enhancing existing facilities as it will not be possible to meet community needs solely through enhancing existing facilities and the policy context is not limited to existing facility enhancement.</i></p>

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Name	Organisation	Summary of Comments
		<p>Policy SLCP3 – development and enhancement of specific facilities Broadly welcomed</p> <p>Suggested change: <i>Criterion (b) should specifically require applicable facilities to be planned and designed to allow community use outside of school/collage hours and use formalised over a long term period through community use agreements.</i></p> <p>Policy SLCP5 – Development of sports facilities in the Green Belt Generally welcomed but the implementation using the current wording may be problematic due to things like staff availability, lack of artificial lighting, clubs needing insurance when used as a public open space etc.</p> <p>Suggested change: <i>To avoid difficulties implementing this policy it would be preferable to have an expectation that “all new sports facilities in the GB are suitable for community use, should be made available for the community (rather than a requirement), when appropriate, and that community access will be expected to be secured through a formal community use agreement where appropriate. The agreement would set out the arrangements for community access that is appropriate to the facility.</i></p> <p>Policy BSS3 – Bishop Stortford South Provides an opportunity to provide facilities listed in the policy and additional sports pitches and outdoor facilities which could form part of the wider public open space.</p> <p>Suggested change: <i>New school developments should be required to make their sports facilities available for community use. For example a new secondary school could offer the potential for a dual use sports hall.</i></p>
Richard Hill	Thames Water	Concerns about both network and treatment capacity to serve the proposed level of development.

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		<p>Suggested changes: <i>Section 4.2.1.4 Both sewerage and wastewater requirements for new development should be referenced to Policy WAT6 of emerging East Herts Pre-submission District Plan.</i></p> <p>Suggested changes: Amend policy Section 4.2.1.4 to read: <i>“Any major new development must ensure that any necessary upgrades to the sewerage infrastructure required to support development are delivered prior to the occupation of development. Development proposals will need to accord with Policy WAT6 of the emerging East Herts District Plan.”</i></p> <p>Delivery of infrastructure Developers should consult Thames Water at the earliest opportunity to establish:</p> <ul style="list-style-type: none"> • The development’s demand for wastewater infrastructure both on and off site and whether it can be met • The surface water drainage requirements and flood risk of the development both on and off site and whether it can be met
P A Luder	Weston Homes Plc. And Bishop’s Stortford Golf Club	<p>As the Neighbourhood Plan was prepared before the consultation for the draft District Plan, it includes several proposals which were not brought forward by the District Plan (option land 2 for 100 dwellings)</p> <p>Suggested changes:</p> <ul style="list-style-type: none"> • amend section 3.12.1.2 to read: “Within the emerging District Plan, it is proposed that the Green Belt boundaries are amended and one adjacent area currently in the Green Belt is allocated for development. The area in question backs directly on to the gardens of bungalows in Manor Links and two storey properties in Cecil Close” • The Policy Maps on page 26 should be amended to reduce the area to include only area 1 as shown in the emerging District Plan • Figure 2 page 17 should be amended to reduce the site area of the Manor Links site and reduce the proposed housing number to 50. • Section 4.1.3.4 to read: “ There are two schemes within the emerging District Plan each of which

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		<p style="text-align: center;">yields over 150 homes(see figure 2 areas 4 and 5)....”</p> <p>Policy HDP1 Object to the wording of Policy HDP1(a) as it is inconsistent with emerging Local Plan where BISH 9 (Area 3) should be brought forward in first 5 years with no relationship to brownfield development</p> <p>Suggested change: Policy HDP1(a) should be omitted or changed to allow Area 3 to be developed on adoption of the District Plan.</p> <p>Policy HDP4 Object to the principle of Policy HDP4(f) if it is contrary to Government legislation at the time of determination of the planning application.</p> <p>Suggested change: The wording should be modified to reflect that it applies only where compatible with legislation</p> <p>4.11.1.1 Object to section 4.11.1.1 According to the 2007 Local Plan policies, this area is designated Metropolitan Green Belt. The area is scrubland, used as a buffer between the Golf Club and existing residential development and a wildlife refuge (including at times used by protected species). It is incorrect to state that the scrubland is used as a buffer between the housing and golf course, it is a low intensity, low noise – generating use and so does not require a buffer. There is no evidence that the scrubland is a “wildlife refuge” or that it is used by protected species even only “at times”</p> <p>Suggested change:</p> <ul style="list-style-type: none"> • Correct 4.11.1.2 to read: “The emerging District Plan proposes that the green belt boundary be amended to exclude this site and that the land be allocated for the development of 50 dwellings.” • Correct 4.11.1.4 to read: “The areas of Manor Links and Cecil Close which directly adjoin the proposed development consist of large low rise mature bungalows and two-storey houses on large

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		<p>plots with open aspect to the proposed development site and a sense of space broken by a selection of mature trees. Mayes Close and Norris Close would experience traffic and footfall should the development proceed".</p> <p>Policy BSEM2 Part a) Object to the claim that single storey dwellings adjacent to Manor Links are required to form a smooth transition to the green belt. This would not support the two storey dwellings between the proposed bungalows and the practice area which BSEM2 does allow.</p> <p>The need for bungalows should be justified by:</p> <ul style="list-style-type: none"> • urban design reasoning, • bungalows backing onto existing bungalows • identified housing need for bungalows <p>Suggested change: Part b) should refer to "space" rather than spaces as the merit of one or several smaller spaces has not been tested.</p> <p>Policy BSEM2 bullets 2 & 3 are repetitive. Suggest omitting bullet 2 and amending 3 as Shortcroft is not adjacent to the site and there should be flexibility to maintain scrub adjacent to either existing road.</p> <p>Suggest BSEM2 fourth bullet point is not relevant as BISH9 does not adjoin the disused railway line</p> <p>Policy BSEM2(c) should refer to access "points" as shown on illustrative material, the two existing places where access can be formed from Manor Links, which accords with BISH9 District Plan consultation draft.</p>