



**East Herts
Local Development Framework**

Core Strategy Preferred Options

Project Plan and Methodology Statement

July 2011

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1.0 Summary and Purpose

- 1.1 With the completion of the Issues and Options stage in preparation of the Core Strategy, this document sets out the Council's approach to reaching the next key milestone, namely the Preferred Options stage.
- 1.2 The Preferred Options stage will be the first time that the District Council sets out for consultation its emerging views on a suitable development strategy for the district to 2031. In other words, the Preferred Options will set out in broad terms, where development should be located, together with a strategy for delivery of that development.
- 1.3 Section 2 provides an overview of the context for preparation of the Core Strategy Preferred Options. It sets out how the preparation of the Core Strategy Preferred Options will respond to changes in the national policy context (as far as we can at the present time) including proposals relating to the delivery of development. It explains the role and function of the Core Strategy and also explains how the Preferred Options stage relates to other stages in preparation of the Core Strategy. Finally, it also sets out the justification and rationale for strategic planning at District level.
- 1.4 Section 3 explains the procedure for selection of the Preferred Option. It explains the basis on which the difficult decisions in respect of the broad development locations will be made. It sets out the various inputs to the decision making process, and explains the procedure by which these inputs will be considered. The aim of this section is to enable stakeholders to see how their views will be considered and understand how the Council will reach its decision.
- 1.5 Section 4 of the document sets out a work programme for preparation of the Preferred Options consultation document, as far as we can be certain at the present time. Given that the detail of the new national planning system remains to be finalised, this may be subject to change.
- 1.6 The work programme itself is provided in Appendix B. This will be made available online at www.eastherts.gov.uk/ldf and paper copies can be provided on request from the Planning Policy Team.
- 1.7 Finally, Section 5 of the document sets out the procedure for handling responses to the Preferred Options consultation.

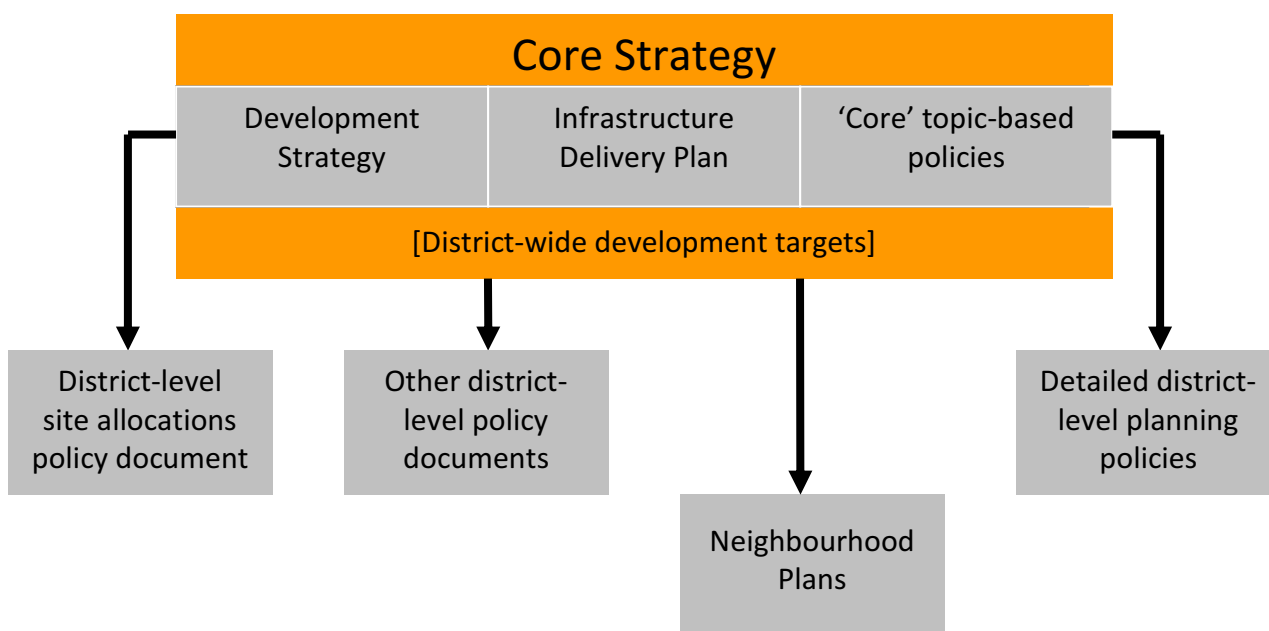
2.0 Core Strategy Preferred Options: Context

2.1 Role and Function of the Core Strategy

2.1.1 The Core Strategy is the first document in the preparation of the Local Development Framework. The Core Strategy has several functions, as shown in Figure 1:

- To set the development strategy (broad locations of growth) for the district;
- To set the overall amount of development for the district over the plan period;
- To provide an infrastructure delivery plan to facilitate effective delivery of the development strategy;
- To set the 'core' planning policies for the district covering topics including housing, economic development, transport, and the environment;
- To embed the principles of sustainable development and good design at the heart of planning policy;
- To provide a context for later District-level policy documents, including site allocations and more detailed planning policies for the determination of planning applications;
- To provide a strategic context for any Neighbourhood Plans which aspire to the status of planning policy through formal adoption by the District Council.

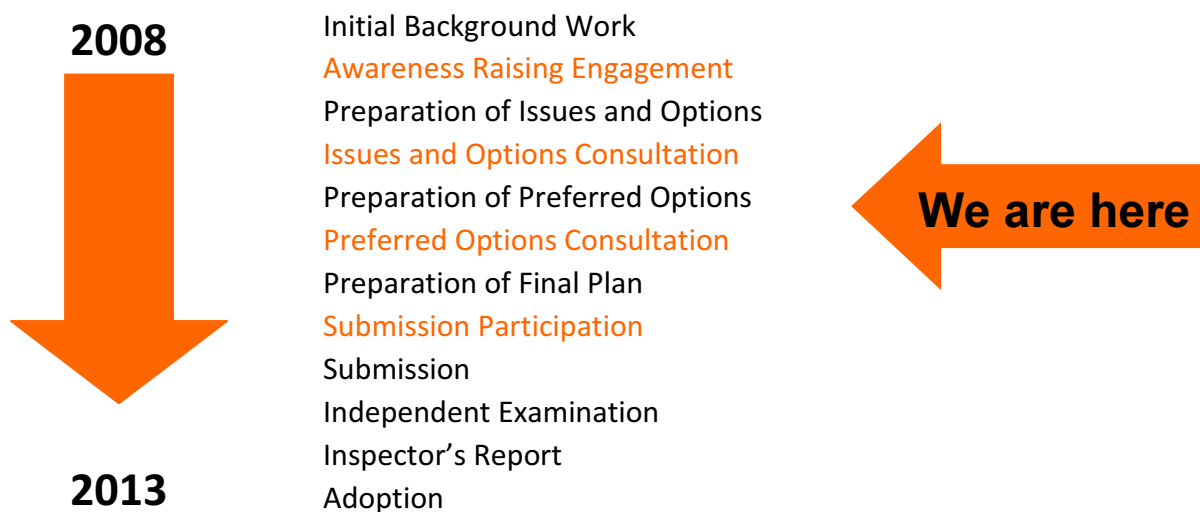
Figure 1: Key functions of the Local Development Framework (LDF) Core Strategy



2.2 Key stages in preparation of the Core Strategy

- 2.2.1 The first stage in preparation of the Core Strategy, known as the Issues and Options stage, was a discussion paper which asked for opinions on any possible development strategy options. Over 3000 responses from individuals and organisations, incorporating 8000 comments were received in response to the Issues and Options consultation in September-November 2010.
- 2.2.2 The second stage in preparation of the Core Strategy is known as the Preferred Options stage, and is the subject of this methodology statement. The Preferred Options stage is the first time that the District Council will set out for consultation its emerging views on the 'difficult decisions' for the development strategy for the district. This is based on the stage one consultation responses and a wide range of other evidence.
- 2.2.3 The third stage is the preparation of the submission version of the Core Strategy. At this stage any significant new information coming forward through the Preferred Options consultation will be assessed and minor changes can be made, or additional information can be used to add support to the delivery strategy.
- 2.2.4 In the event that significant new evidence comes to light during the Preferred Options consultation, the Council may need to re-consult on its Preferred Options before producing its Submission version.
- 2.2.5 The fourth and final stage is in the examination and adoption of the Core Strategy, which is the process by which the strategy becomes planning policy for the district and gains the weight of statute. This constitutes a final 'quality assurance' check on the plan.

Figure 2: Core Strategy Stages of Production (orange text represents stages of production)



2.3 National and Regional Changes to Planning

2.3.1 During the preparation of the Core Strategy the Localism Bill was published, which contained a series of proposed changes to the planning system. Although the Bill has not yet been enacted as an Act of Parliament and there is still the possibility of some late changes, the basic direction of policy as it will impact the preparation of the Core Strategy is clear.

2.3.2 Firstly, Regional Spatial Strategies, including the East of England Plan, are to be abolished. This has several implications for the East Herts Core Strategy:

- housing and other targets currently set by the East of England Plan will need to be replaced by targets set at District level;
- the Core Strategy Preferred Options process can no longer treat north of Harlow separately from other development strategy options, as it did in the Issues and Options Consultation document;
- The separate housing quota established in Policy HA1 of the East of England Plan no longer applies, and therefore if any development is proposed north of Harlow, this would count towards the East Herts district-wide housing requirement;
- the replacement of certain key environmental policies contained within the East of England Plan, for example related to water consumption and climate change, will need to be considered by the Core Strategy.

2.3.3 Secondly, through the Local Development Framework Core Strategy, East Herts District Council is to have responsibility for all strategic planning policy within its boundaries. This is to include setting the amount of development for the plan period, setting the development strategy (the broad locations for development), infrastructure planning, and setting the Community Infrastructure Levy.

2.3.4 Thirdly, a new tier of planning policy is to be introduced below the district level. These 'Neighbourhood Plans' are likely to be at Parish level, and, provided that they are in conformity with the district's Development Plan (of which the Core Strategy is the most important part) and meet various other requirements, the District Council will be under an obligation to adopt them as planning policy. The government has stated that one of the principal objectives of neighbourhood planning is to increase the rate of growth of housing and economic development, and therefore it has announced a number of proposals to ensure that Neighbourhood Plans may not propose less development than that contained within the Local (District) Plan¹

2.3.5 Fourthly, the government has introduced a number of financial incentives in order to promote more development. These include the New Homes Bonus and the

¹ These proposals have been set out in a number of different government publications, including *The Plan for Growth* (HM Treasury, March 2011); *The Local Growth White Paper* (BIS, October 2010), and the *Localism Bill Impact Assessment* (CLG, January 2011). Details are expected within the National Planning Policy Framework, scheduled for consultation during summer 2011.

Community Infrastructure Levy (CIL). The New Homes Bonus will “match fund the additional council tax for each new home and property brought back into use, for each of the 6 years after that home is built with an additional amount for affordable homes” (Grant Shapps, Minister for Housing and Local Government, 12th November 2010).

- 2.3.6 CIL should help to fund the necessary infrastructure to support communities as they grow. CIL will be levied on all forms of development, with the exception of householder applications. District Councils will be responsible for setting the level of CIL and establishing a ‘charging schedule’.
- 2.3.7 The CIL regulations (April 2011) are clear that CIL should be integrated with local strategic planning through the Local Development Framework. In recognition of the key supporting role of CIL in delivery of the Core Strategy, East Herts Council intends that CIL will be adopted at the same time as the Core Strategy. An initial consultation on a draft CIL charging schedule will accompany the Preferred Options consultation. This will progress in parallel with the accompanying work on the infrastructure assessment and the Infrastructure Delivery Plan.

2.4 The need for a district-wide strategy

2.4.1 The government has decided that the District level represents the best balance of local accountability and strategic planning. The strategic level of planning will provide the context for the new tier of neighbourhood planning.

2.4.2 There are a number of reasons why a district-wide strategy is needed. It should:

- Provide the statutory basis and hence long-term certainty and confidence for individuals and organisation to make their own plans;
- Enable early planning of infrastructure and service provision to support new development;
- Facilitate work on strategic development issues with adjacent authorities, government partners and delivery agencies;
- Ensure democratic accountability;
- Provide a framework for local strategies and aspirations;
- Ensure that different development sites and types of development work together in the interests of the locality and wider area, rather than in isolation;
- Ensure that wider social, economic, and environmental goals are considered.

2.4.3 One of the most important goals of the Core Strategy is achieved in the process of its production. The process, described in Section 3 below, should demonstrate how the aspirations of a wide range of individuals and organisations may be considered as part of a fair and transparent plan-making process. This is a difficult task, particularly where it requires the Council to decide between conflicting aspirations. In this document, the Council aims to show how its decisions will be informed by a clear and robust decision making process.

3.0 Development Strategy Assessment Process

3.1 Introduction

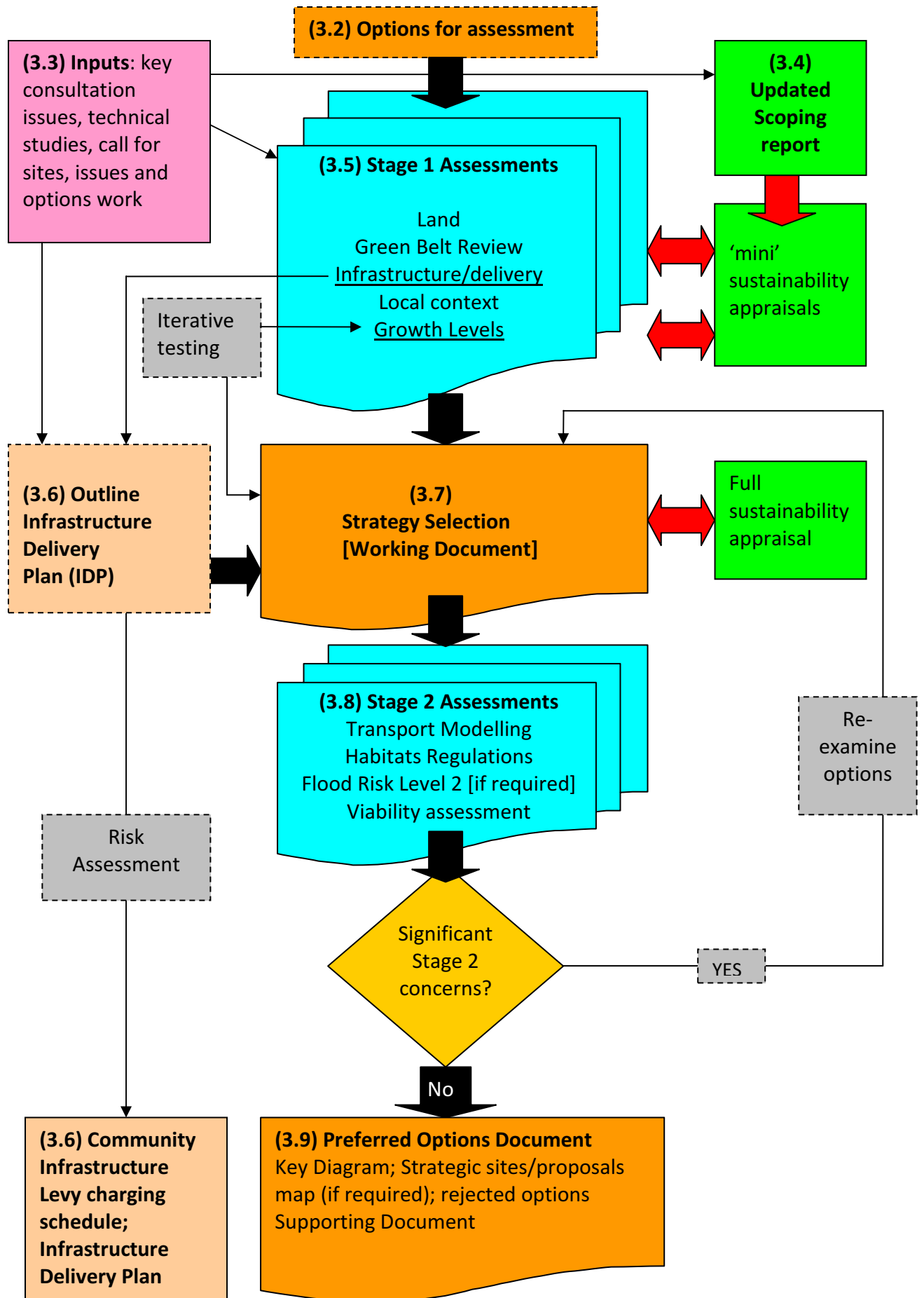
3.1.1 This section explains the procedure for assessment and selection of the preferred development strategy. This section thereby provides the basis for a transparent understanding of the process. It also provides a basis for understanding the Work Programme set out in Section 4.

3.1.2 Figure 3 outlines the assessment process. Each of the numbers in brackets on the diagram corresponds with a sub-section number with Section 3. For further explanation of each step in the progress please refer to the appropriate sub-section below.

3.1.3 Figure 3 may be summarised as follows:

- Inputs (information) are used to update the Scoping Report, which is used to provide baseline information for Sustainability Appraisal of the emerging options, and also to input to the Stage 1 assessments;
- Stage 1 technical assessments are applied to all the initial options. Each of these assessments is then challenged by a 'mini' sustainability appraisal with the aim of improving the breadth and depth of each assessment;
- The Strategy Selection working document will aim to draw together the results of all these separate assessments and provides the first tentative view on appropriate preferred options. The emerging Strategy is then subjected to a full sustainability appraisal with the aim of challenging and improving it;
- Proposed growth levels will be tested against the emerging strategy to see whether they support or undermine it;
- The Stage 1 infrastructure and delivery assessment and any further relevant inputs are used to scope out a draft Infrastructure Delivery Plan (IDP) for consideration alongside the Strategy Selection Report;
- Stage 2 assessments are run against the Preferred Strategy options. If these assessments raise significant concerns, it will be necessary to re-examine the strategy selection report to see whether a) preparation of appropriate mitigation strategies are possible to address the concerns, or failing that b) to look at an alternative development strategy;
- If the Stage 2 assessments do not raise significant concerns then it will be possible to prepare the Preferred Options document for consultation;
- A draft Community infrastructure Levy (CIL) charging scheme and Infrastructure Delivery Plan to support the Preferred Options will also be published for consultation at the same time.

Figure 3: Development Strategy Assessment Process (section references in brackets)



3.2 Options for Assessment

- 3.2.1 As a starting point, the assessment process will examine the options set out in the Issues and Options consultation document². This includes four different types of options: the district-wide development strategy, the district-wide distribution strategy, the settlement-level growth options; and the village strategy. These are set out below.
- 3.2.2 This assessment framework will not preclude any reasonable alternative options which may emerge through subsequent work, nor will it preclude a combination of two or more of the different options from coming forward.
- 3.2.3 Firstly, the assessment will focus on the district-wide strategic options as follows:
- **Option A:** Towns
 - **Option B:** Towns and Larger Service Villages
 - **Option C:** Towns, Larger Service Villages and Smaller Service Villages
 - **Option D:** Towns, Larger Service Villages, Smaller Service Villages, and Other Villages/Hamlets
 - **Option E:** Towns. Stevenage and Welwyn Garden City
 - **Option F:** Settlements within Transport Corridors
- 3.2.4 In the context of Policy HA1 of the East of England Plan, the Issues and Options consultation document set out separate options for urban extensions to Harlow. However, given that there is no longer a requirement to consider Harlow separately, development north of Harlow will be considered as part of Option E, since it shares several characteristics with that option, as an urban extension to a town in a neighbouring district.
- 3.2.5 The Issues and Options consultation specifically discounted the option of a 'new settlement' because of issues about deliverability and the fact that such an option would not have been in conformity with the East of England Plan. There is support for this approach. However, a number of respondents have proposed the creation of a new settlement to meet the district's development needs. In light of the impending revocation of the East of England Plan, it is proposed that further engagement with infrastructure stakeholders is undertaken in respect of this issue to resolve how realistic and feasible such an option is in terms of deliverability.

² Please refer to the Issues and Options consultation document for an explanation of the original options generation process. See for example Chapter 1 and Section 3.7 at <http://consult.eastherts.gov.uk>

3.2.6 Whichever development strategy option we choose, we still need to decide how to distribute the district-wide 'to-find' figure between the identified settlements. The Issues and Options consultation document identified six different distribution strategies:

- **Approach I:** Proportional Distribution
- **Approach II:** Adjusted Proportional Distribution
- **Approach III:** Reversed Proportional Distribution
- **Approach IV:** Equal Distribution
- **Approach V:** Distribution by Land Availability
- **Approach VI:** Distribution by Settlement Type

3.2.7 The development strategy selection process will consider all the settlement-level growth options set out in the Issues and Options document as follows:

- **Bishop's Stortford:** within the existing built-up area; to the northeast; to the east; to the southeast; to the south.
- **Buntingford:** within the existing built-up area; to the south and west; to the north; to the northeast; to the east.
- **Hertford:** within the existing built-up area; to the west; to the north; to the south.
- **Sawbridgeworth:** within the existing built-up area; to the southwest; to the west; to the north.
- **Ware:** within the existing built-up area; to the north; to the east; to the south east; to the south west.

3.2.8 Finally, the Preferred Options Assessment will consider the approach to development in the villages based on three village types (Larger Service Villages, Smaller Service Villages, and other Villages/Hamlets), and the identification of particular villages within each village type.

3.3 Key Inputs to the Assessment process

3.3.1 In brief, the inputs include:

- Technical studies
- Preferred Options Assessments
- Issues arising from the Issues and Options consultation
- Landowner/Developer submissions to the Call for Sites
- Feedback from community events
- Information from ongoing dialogue with key stakeholders
- Sustainability Appraisal/Scoping Report
- The Issues and Options consultation document

Technical Studies

3.3.2 Existing evidence will be updated or supplemented where necessary. A list of technical studies is provided in Appendix A.

3.3.3 A study of an appropriate housing target will need to be completed, following the abolition of the targets set in the Regional Spatial Strategy.

Preferred Options Assessments

3.3.4 The Preferred Options assessments will draw on existing information where this is available and relevant, but will also incorporate new evidence, ranging from field surveys and desk-top research through to information from dialogue with infrastructure and service providers. For more information see Sections 3.5 and 3.8 below.

Consultation issues

3.3.5 Where significant issues relating to the development strategy have been raised through the consultation, these may be considered in one of the following ways:

- Significant issues which do not require further investigation will be considered directly in the Strategy Selection Working Document (see Section 3.7 below). This applies to comments from all sources, including residents, businesses, infrastructure providers, landowners and developers;
- Significant issues which require further investigation and relate to one or more of the assessments will be considered as part of the relevant assessment process;
- Issues which are considered to require further investigation but do not fall within one of the assessments will be programmed as a separate workstream and then considered through the Strategy Selection Working Document.

Landowner/Developer Submissions

- 3.3.6 These submissions³ will be considered through the land assessment discussed in more detail in Section 3.5 below.
- 3.3.7 Any strategically important issues arising from the Call for Sites may also be considered directly by the Interim Preferred Options report, alongside relevant issues arising from the Issues and Options consultation.
- 3.3.8 At this stage there have been no direct meetings with any landowners or developers. However, moving forwards to the submission stage it may be necessary to meet some landowners or developers, depending on any outstanding issues related to delivery of the strategy. Such issues should be identified through consideration of the responses to the Preferred Options consultation.

Feedback from stakeholder events

- 3.3.9 There will be a number of stakeholder events prior to any decisions on the Preferred Options. These may be similar in nature to some of the interactive events held during the preparation of the Issues and Options consultation document.⁴

Key Stakeholder dialogue

- 3.3.10 There will need to be ongoing dialogue with key stakeholders as an initial assessment of the feasibility of the options, particularly in relation to transport and infrastructure concerns. For example, these are likely to include infrastructure and service providers, and statutory bodies such as the Environment Agency.

Sustainability Appraisal

- 3.3.11 The Sustainability Appraisal Scoping Report contains a lot of information relating to a series of topic areas and different spatial areas around the district. It was used as the basis for the Sustainability Appraisal of the Issues and Options document. The Scoping Report may need to be supplemented by any new relevant information.

The Issues and Options Consultation document

- 3.3.12 The document includes information on key issues in each of the five main towns and in the villages and the rural area. Supplemented by issues arising from the comments received in response to the consultation, the document provides a good source of baseline information to inform the decision-making process.

³ Sites were submitted through the Call for Sites exercise. A list of submissions and accompanying site plans are available to view at www.eastherts.gov.uk/callforsites. The information received will be assessed through the Strategic Land Availability Assessment (SLAA). Details of the SLAA are available in the SLAA Project Plan.

⁴ A list of consultation events before and during the Issues and Options consultation event is available on the Council's website at www.eastherts.gov.uk/issuesandoptions

3.4 Sustainability Appraisal

- 3.4.1 Sustainability Appraisal (SA) involves identifying and evaluating the impacts of a plan on the economy, the community, and the environment – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan as well as ways of maximising its positive impacts. SA is a statutory requirement for Core Strategies under the Planning and Compulsory Purchase Act 2004.
- 3.4.2 Scott Wilson Consultants Ltd prepared an SA Scoping Report for the Council in March 2010, which included a key stakeholder consultation period⁵. The Scoping Report sets out the baseline data and framework for the assessment of the strategic options. Using the Scoping report, Scott Wilson conducted a Sustainability Appraisal of the six development strategy options (A-F) and the ‘possible directions of growth’ around the towns.
- 3.4.3 For the appraisal of the Preferred Options process, a full appraisal of the Interim Preferred Options Report will be conducted. The appraisal will be based on the Scott Wilson Scoping Report plus an updated baseline data report consisting of any new information, for example issues raised by the consultees or by the various assessments. The appraisal will incorporate a Strategic Environmental Assessment Assessment (SEA) as required under (European) Directive 2001/42/EC. It will also incorporate a rural proofing assessment, a Health Impact Assessment and an Equalities Impact Assessment.
- 3.4.4 There will be an iterative relationship between the Interim Preferred Options Report and the SA. If the SA identifies significant issues with the Interim Preferred Options, the Interim Preferred Options will be reassessed in the light of the findings of the SA.

‘Mini’ Sustainability Appraisals

- 3.4.5 The emerging findings of the four assessments in terms of the options will then be appraised for their likely wider social, economic and environmental impacts using the sustainability appraisal framework contained in the SA Scoping Report. Any significant findings from this ‘mini-SA’ will be used to adjust the findings within each assessment, and to draw out possible conflicts or areas in need of mitigation.
- 3.4.6 The SA will be conducted in-house by the Planning Policy Team. The Council believes that at the Preferred Options stage a detailed local knowledge of key issues affecting the emerging development strategy is essential to a meaningful appraisal. The Council’s Planning Policy Team, rather than external consultants, are best placed to accomplish this. However, different members of the team have been assigned to work on the Strategy Selection working document and the SA, and therefore the necessary critical distance can be maintained.

⁵ For more details see www.eastherts.gov.uk/corestrategysa

3.5 Stage 1 Assessments

3.5.1 There will be five initial assessments, each informed by the relevant technical studies:

- Infrastructure assessment
- Land assessments
- Green Belt Review
- Local context assessment (known as the MAPS study)
- Growth levels assessment

3.5.2 Each assessment will draw out any information of relevance to the development strategy options, and make some initial comments on the relative strengths and weaknesses of each option.

Infrastructure Assessment

3.5.7 The Infrastructure Assessment will provide a high-level assessment of the deliverability of the options, and also look at the different infrastructure requirements under each option.

3.5.8 The assessment will be high-level rather than detailed because **a)** information is limited given that East Herts Council is not directly responsible for the delivery of much of the infrastructure required by new development, and **b)** even where East Herts Council has been able to obtain information from providers, certain broad assumptions have had to be made given the early stage in strategy formulation.

3.5.9 It will be possible to go into more detail about infrastructure delivery as more certainty is gained about the emerging Preferred Options. This will be set out in an Infrastructure Delivery Plan (IDP) to accompany the Core Strategy.

Land Assessment (SLAA)

3.5.10 An assessment of land available for development will be carried out based on the information submitted through the Call for Sites. The main objective is to assess the suitability of the land suggested by developers. Far more land was submitted than will be needed in order to accommodate the full housing requirement for the district, and therefore it will be necessary to carefully examine each site against a standard set of assessment criteria.

3.5.11 By integrating the land assessment with the other assessments as part of the preferred option selection methodology, it will also be possible to assess each site against the emerging preferred strategy, which will provide an important additional check on the site-level assessments. This second level of checks will enable the assessment to respond to a wider range of concerns than would be possible by considering each site in isolation.

3.5.12 As with the other assessments, it will be necessary to undertake the land assessment in two distinct iterations: the first, concluding the site-level assessments; and the

second, when further information from the other assessments and therefore the emerging preferred options are understood.

Green Belt Review

- 3.5.13 The Issues and Options consultation highlighted that a Green Belt review would be necessary since there is insufficient brownfield land to accommodate the housing requirement.
- 3.5.14 The Green Belt review will assess all the Green Belt land in the district against the five criteria set down in PPG2. It will also assess where compensatory Green Belt extensions may be made. The study will pay particular attention to the edges of settlements as identified in the development strategy options and possible directions of growth outlined in the Issues and Options consultation.

Local Context assessment (MAPS)

- 3.5.15 The local context assessment will sit alongside the land assessment and the Green Belt review as it will look in detail at land, but from the perspective of the context of the 'grain' of the local built and natural environment. Principally through map-based study it will attempt to describe and explain the character of places and show how that character could be sustained, enhanced, or evolved as necessary.
- 3.5.16 As with the previous two assessments, the local context assessment will be conducted through two iterations. As with the other assessments, the local context assessment will work in two iterations. The first iteration will look at the local context in isolation. The second iteration will look at potential changes to the local context through the adoption of the emerging preferred development strategy.

Growth levels assessment

- 3.5.17 With the anticipated abolition of Regional Spatial Strategies including the East of England Plan, it may shortly be for Local Planning Authorities to decide on how much development is appropriate for the district as a whole as part of their development strategy⁶.
- 3.5.18 Whilst the details of the methodology for deciding the amount of growth have yet to be finalised, part of the process should involve assessing growth levels scenarios against the emerging development strategy, to ensure that the overall growth targets set serve to support rather than undermine the strategy. The emerging growth levels will need to be tested iteratively against the emerging strategy to see what the effects of different growth level scenarios are likely to be.

⁶ Regional Spatial Strategies were first revoked by the Government on 6 July 2010 but were subsequently re-established on 10 November 2010 after a successful challenge by housebuilder CALA homes. Following this, the Government advised that it is for local planning authorities to decide what weight to give to the intention to abolish regional strategies. However, a more recent decision in the High Court (May 2011) has confirmed that the Government's intention to revoke regional strategies may only be worthy of being given weight in very few cases in which the proposed abolition of regional strategies will be relevant. Moreover, the intention to abolish should not be a factor in the plan-making process. Thus, in terms of the East Herts Local Development Framework (LDF), the provisions of the East of England Plan remain in place until the Localism Bill is enacted and a Strategic Environmental Assessment (SEA) of its revocation is completed.

3.6 Infrastructure Delivery Plan

- 3.6.1 One of the key aims of the Core Strategy is to enable early planning of infrastructure and service provision to support new development (see Section 2.4 above). An outline Infrastructure Delivery Plan will be prepared alongside the Strategy Selection Report (see Section 3.7 below), informed by information from the Stage 1 Infrastructure Assessment, technical studies, and ongoing dialogue with key delivery partners.
- 3.6.2 As more certainty emerges about the emerging Preferred Options it will be possible to add more detail to the Infrastructure Delivery Plan. Whilst the initial outline Plan is likely to contain many gaps, it should be possible to fill these in through ongoing research as work progresses.
- 3.6.3 A wide range of agencies from the public and private sectors are responsible for the delivery of essential infrastructure. The IDP has several functions:
- To act as a check on the realism of the emerging Core Strategy;
 - To act as a monitoring tool to ensure that development does not outpace infrastructure delivery, enabling coordinated phasing of the development pipeline;
 - To flag up any critical gaps, for example in knowledge of who will supply the infrastructure, or how it will be funded.
- 3.6.4 If critical gaps remain following work on the Preferred Options and these are not filled in by information from the Preferred Options consultation, it will then be necessary to conduct a risk assessment to judge whether the Infrastructure Delivery Plan is sufficiently robust to enable effective delivery of the Core Strategy.
- 3.6.5 The Infrastructure Delivery Plan will also form the context for the draft Community Infrastructure Levy Charging Schedule (see Section 2.3 above).

3.7 Strategy Selection Working Document

3.7.1 This report will draw together the conclusions from each of the five main assessments. It will also draw on any relevant information from the technical studies which have not been incorporated into the updated Scoping Report.

3.7.2 The report will assess:

- the development strategy options against the Core (thematic) Policies;
- whether any 'strategic sites' may be required as allocations within the Core Strategy, and if so, which these might be;
- the jobs and employment implications of the various options;
- settlement-specific growth levels, to take forward to the Stage 2 assessments;
- the key inter-dependencies between the options at various levels.

3.7.3 Regarding this last point, the inter-dependencies may be either top-down or bottom up. For example, if certain district-wide strategies are not compatible with effective infrastructure delivery, this top-down consideration may help to structure the response accordingly. If certain settlement-level growth options are not realistic, this may influence the selection of district-wide strategies. The selection process will aim to ensure that the 'big picture' strategy is carefully informed by the relevant detail.

3.7.4 The report will be revised following the completion of the Stage 2 assessments to incorporate any relevant findings. If the Stage 2 assessments suggest that there may be serious problems with the Preferred Option, this second iteration of the report will need to address either mitigation measures, or examine another preferred option.

3.7.5 Due to its status as a working document which is likely to be subject to frequent revision and amendment throughout the assessment process, the Strategy Selection working document will not be a public document during the process of its development. However, the finalised Strategy Selection Report will be included in the supporting document to the Preferred Options consultation so that consultees may observe the rationale and process of selection for the Preferred Option.

3.8 Stage 2 Assessments

- 3.8.1 As outlined above, the Stage 2 assessments are those which can only reasonably be undertaken once there are some emerging preferred options to assess.

Habitats Regulations Assessment

- 3.8.2 A Habitats Regulations Screening Report of all the development strategy options was undertaken by Scott Wilson Consultants as part of the preparation of the Issues and Options consultation document. This concluded that none of the options could be screened out as having no impact on European Wildlife Sites in the vicinity (Wormley-Hoddesdonpark Woods Special Area of Conservation, Epping Forest SAC, Lee Valley Special Protection Area, Lee Valley Ramsar).
- 3.8.3 The consultants recommended that more detailed research should be undertaken once a preferred strategy starts to emerge. Given the need to comply with the Habitats Directive, in the event that this work identifies substantial likely significant effects on the European Sites, it will be necessary to either identify appropriate mitigation measures or reassess the emerging preferred option.

Flooding Assessment

- 3.8.4 A district-wide flood risk assessment was carried out as part of the evidence base for the LDF⁷. The information in that assessment will be used to inform the land assessment referred to above.
- 3.8.5 In the event that the emerging preferred options include land identified in the district-wide flood risk assessment as 'at risk', it will be necessary to prepare a more detailed flood risk assessment of the broad locations affected under the emerging preferred option. If this study is required, it will be prepared with the close involvement of the Environment Agency.
- 3.8.6 As with the Habitats Regulations assessment, in the event that this detailed flood risk assessment identifies a high flood risk, adequate mitigation solutions will need to be proposed, otherwise it will be necessary to re-examine the options.

Transport Modelling

- 3.8.7 Transport modelling is a quantitative assessment exercise which requires certain assumptions to be made about development options. Where such assumptions cannot be made, for example where there is insufficient information, transport modelling cannot be used. Given the expense and scope of transport modelling, there is a cost-benefit calculation to make in terms of targeting modelling in the most effective way.

⁷ See www.eastherts.gov.uk/sfra

3.8.8 Given these limitations, it is not possible to comprehensively model all the development strategy options. Therefore modelling will be targeted on the emerging Preferred Option as a 'quality assurance' check. In the event that this modelling (together with the habitats regulations assessment and any necessary work on flood risk) uncovers significant negative effects from the emerging preferred option, these will be flagged up and then the emerging option will be reappraised against the original options, together with possible mitigation strategies.

3.8.9 There are three transport models available for use by East Herts Council:

- DIAMOND is an Excel-spreadsheet based model operated by Aecom Consultants but endorsed by Hertfordshire County Council;
- the Harlow-Stansted-Gateway Transportation Board (HSGTB) model will be used to test the option for development north of Harlow together with options along the A1184, including Sawbridgeworth and Bishop's Stortford. The HSGTB model has the advantage of being able to assess the cumulative impacts of other developments in Essex, together with the effect of new roads such as the north Harlow – M11 link road;
- The SATURN model covering Bishop's Stortford may be used in conjunction with any new models to test the impact on development of the Bishop's Stortford North Areas of Special Restraint (ASRs) and other sites in the town.

3.8.10 In carrying out transport modelling, East Herts Council will work closely with Hertfordshire County Council as the highways and transport authority for the District, and with the Highways Agency to consider motorway impacts where necessary.

Viability Assessment

3.8.11 It is important that the emerging Preferred Options should be financially viable. As with the other Stage 2 assessments, if these options are shown to be unviable, then it will be necessary to re-examine the emerging strategy.

3.8.12 The viability assessment will need to be carried out alongside the draft Infrastructure Delivery Plan, taking account of likely costs and funding streams including the Community Infrastructure Levy (CIL).

3.9 Structure and Content of the Preferred Options Document

3.9.1 As noted in Section 1 above, the Preferred Options consultation is the first time the Council will set out for consultation its emerging views on the 'difficult decisions' for the development strategy for the district. In this respect, the Preferred Options Consultation Document is a draft Core Strategy. The Core Strategy is one of several policy documents in the LDF, and is by nature high-level, and should therefore be succinct⁸.

3.9.2 The Preferred Options consultation document will:

- establish the proposed **structure** of the Core Strategy document, and will also strive to attain the same concise nature;
- make it clear **which options have been rejected and why**. A brief explanation will be given in the main document, and further explanation will be given in a supporting document if necessary;
- include a draft **Key Diagram**. The purpose of the Key Diagram is to depict and explain the core components of the development strategy, which is comprised of the broad locations for future development;
- include draft **Core Policies**, which will be based on the themes set out in the Issues and Options document. The document will show how the draft Core Policies will achieve the relevant Strategic Objectives⁹;
- include the key components of the **delivery strategy**, such as infrastructure and employment.

Depending on the nature of the emerging development strategy, the Preferred Options document may:

- include a **proposals map** showing 'strategic sites'. Individual site allocations will be set out in the Site Allocations policy document, once the Core Strategy has been established. However, if certain sites are deemed to be critical to the delivery of the development strategy, these may be allocated through the Core Strategy as 'strategic sites'.

⁸ The Issues and Options consultation document is a discussion document designed to introduce the background and context against which key issues can be evaluated. It is therefore of necessity much longer than a draft Core Strategy.

⁹ The draft Strategic Objectives were set out for consultation in Chapter 2 of the Issues and Options consultation document.

4.0 Work Programme

- 4.1 The Core Strategy Work Programme is shown in Appendix B. This provides the detail to the overall scheme given in Figure 3 (page 10).
- 4.2 It should be noted that given changes to national guidance and other circumstances beyond the control of the Council, the Work Programme should be seen as a guide and may be updated at intervals. Updates will be available online at www.eastherts.gov.uk/ldf or in paper format on request from the Planning Policy Team. The LDF Bulletin will notify registrants of updates to the Work Programme.
- 4.3 The Work Programme shows timelines for forthcoming work on the Preferred Options stage. As yet the Submission Stage (see Section 2.2 above) has not been added to the Work Programme given inherent uncertainties in the policy planning context over the longer duration.
- 4.4 In respect of the Preferred Options stage, this follows on from the Assessment Process outlined in Section 3 (and Figure 3) above.
- 4.5 In brief, the timeline is as follows:
- September 2011 – completion of Stage 1 Assessments
 - November 2011 – completion of Strategy Selection Report
 - January 2012 – Completion of Stage 2 Assessments
 - January 2012 – Completion of Preferred Options Document
 - April 2012 – approval from members for consultation on Preferred Options
 - May-July 2012 – consultation on Preferred Options
- 4.6 It should be noted that there are several ‘critical path’ dependencies within the Work Programme. Therefore, whilst it is possible to conduct some work in parallel, some of the work cannot be commenced until other tasks have been completed. For this reason it is unlikely that the Work Programme will be able to compress the Stage 1 and Stage 2 assessments, for example.

5.0 Handling Consultation Responses

- 5.1 Consultation forms a key part of the democratic policy process. All the issues raised through the consultation process are considered and form a key input to the policy process, as shown in Figure 3 above (see paragraph 3.3).
- 5.2 However, the Government has made it clear that, as part of the Growth agenda, it expects Local Planning Authorities to make rapid progress in getting their plans in place. To this end, a new 'presumption in favour of sustainable development' is to be introduced, which will mean that where a Local Planning Authority does not have an up-to-date plan in place, decisions on planning applications will be based solely upon national policy.¹⁰
- 5.3 East Herts Council has an online consultation portal for LDF consultations (see <http://consult.eastherts.gov.uk>). One of the principal benefits of this system is that it speeds up the handling of consultation responses, since respondents enter their own name, organisation, and comments. In previous consultations, any responses which were not entered directly by respondents using the system were typed up by Council officers. This is a very time-consuming process, and has the potential to cause considerable delay to the policy-making process, particularly for consultations where a large volume of comments are received.
- 5.4 Nevertheless, East Herts Council proposes to continue to give consultees a choice of how to respond to consultations. Although the Council prefers consultees to respond using the online consultation portal, there will be no requirement to use it.
- 5.5 However, anticipating a large volume of responses to the Core Strategy Preferred Options consultation, the following steps will be followed:
1. There will be continued efforts to simplify and improve the user experience of the online consultation portal;
 2. There will be further efforts to promote the portal in preference to other response mechanisms;
 3. Where the Council is aware that groups are intending to coordinate a large campaign in response to a consultation, such groups will be informed of the Council's preference for responses to be made using the portal, and explanation of how to use the portal will be provided;
 4. Comments received from individuals in hard copy format will be made available online in an appropriate format where practicable, or if not practicable, the original documents will be available for viewing at the Council offices;
 5. In the interests of transparency, all submissions from organisations, agencies, businesses, landowners and developers, and Town and Parish Councils, will be

¹⁰ Details of how this will work in practice are anticipated to be clarified by the Government during 2011.

scanned or typed up and made publicly available within the consultation event on the online consultation portal;

6. All responses will be made available for public viewing, either online or in hard copy format, until at least three months after the Core Strategy is adopted;
7. All respondents will be notified of receipt of their comments, preferably by email or, failing that, by post;
8. A list of the name, settlement, and organisation (if applicable) of all respondents will be made available online, either as part of the consultation event within the portal, or separately as a simple list, depending on how the comments were submitted;
9. Issues arising from all comments received will be summarised in the Council's issues report following the consultation;
10. Consultees who wish to receive ongoing updates about the LDF can sign up to receive the LDF Bulletin. Explanation of how to do this will be provided.

5.5 It should be re-iterated that all the issues raised will be carefully considered, from whatever source or however they are submitted, and these will be reported in the issues report following the consultation (point 9 above). However, the differing ways in which the comments themselves will be made available for public viewing, depending on the way in which they were submitted, reflects the Council's determination to maintain transparency whilst meeting the Government's requirement to speed up the plan-making process.

Appendix A - List of Technical Studies/Strategies/Briefs

| Topic area | Study Title | Date |
|------------------------------|--|-------------|
| Bishop's Stortford | Bishop's Stortford Transport Study | 2006 |
| | Bishop's Stortford Masterplanning Study | 2006 |
| | Mill Site Development Brief | 2010 |
| | Goods Yard Development Brief | 2011 |
| | Bishop's Stortford and Sawbridgeworth Urban Transport Plan | 2011 |
| Energy and Climate Change | Herts Renewable and Low Carbon Study | 2010 |
| | Herts Climate Change Scoping Study | 2009 |
| Employment and Retail | Employment Land and Policy Review | 2008 |
| | Retail and Town Centres Study | 2008 |
| Environment | Strategic Flood Risk Assessment | 2008 |
| | Habitats Regulations Assessment | 2010 |
| | Landscape Character Assessment | 2007 |
| | Wildlife Sites Ratification Report | 2009 |
| | Hertfordshire Strategic Green Infrastructure Plan | 2011 |
| | East Herts Green Infrastructure Plan | 2011 |
| Gypsy and Travellers | Accommodation Assessment Stage 1 - Needs | 2006 |
| | Accommodation Assessment Stage 2 - Site Scoping | 2007 |
| Hertford | Hertford and Ware Urban Transport Plan | 2010 |
| | Riverside Yards Development Brief | 1998 |
| | Mead Lane Urban Design Framework | 2011 |
| Housing | Housing Capacity and Edge of Settlement Study | 2007 |
| | Housing Needs Survey/update | 2004/5 |
| | Strategic Housing Market Assessment (SHMA) | 2008 |
| | SHMA Viability Assessment | 2010 |
| Infrastructure and Transport | Herts Infrastructure and Investment Strategy (HIIS) | 2010 |
| | Eastern Herts Area Transport Plan | 2007 |
| | HIIS Transport Report | 2010 |
| | Rye Meads Water Cycle Strategy | 2009 |
| | Herts Local Transport Plan 3 | 2011 |
| | Hertfordshire Inter-Urban Routes Strategy | Forthcoming |
| Land | Strategic Land Availability Assessment | 2011 |
| | Call for Sites | 2008 |
| Leisure | PPG17 Audit and Assessment | 2005 |
| | Playing Pitch Strategy and Outdoor Sports Audit | 2010 |
| North of Harlow | Harlow Options Appraisal | 2010 |
| | Harlow Infrastructure Study | 2010 |
| Sawbridgeworth | Bishop's Stortford and Sawbridgeworth Urban | Forthcoming |

| Topic area | Study Title | Date |
|---------------------------------|---|-------------|
| | Transport Plan | |
| Stanstead Abbots & St Margarets | St Margarets Farm Development Brief | |
| Sustainability | Sustainability Appraisal Indicators and Targets | 2007 |
| | Sustainability Appraisal | 2010 |
| Ware | Hertford and Ware Urban Transport Plan | 2010 |
| | Trinity Centre Development Brief | 2002 |

Appendix B: Work programme

[see attached]