

EAST HERTS COUNCIL

LOCAL DEVELOPMENT FRAMEWORK EXECUTIVE PANEL – 7 JULY 2011

REPORT BY EXECUTIVE MEMBER FOR PLANNING POLICY AND ECONOMIC DEVELOPMENT

LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY - RESPONSES TO ISSUES AND OPTIONS PUBLIC CONSULTATION 2 SEPTEMBER 2010 TO 25 NOVEMBER 2010

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents for consideration a summary of the issues raised, and an analysis of the responses received, to the Local Development Framework Core Strategy Issues and Options consultation. It also sets out the need for further technical work to inform the East Herts housing requirement.

| <u>RECOMMENDATION TO EXECUTIVE: to commend to Council that:</u> | |
|--|---|
| (A) | Members note the issues raised from the Core Strategy Issues and Options consultation; |
| (B) | the responses received and issues raised are used to inform the preparation of the next stage of the East Herts Core Strategy called Preferred Options; and, |
| (C) | Members note the ongoing and further technical work being undertaken to inform the East Herts housing requirement. |

1.0 Background

1.1 The Core Strategy is the first Development Plan Document (DPD) East Herts Council is producing as part of its Local Development Framework (LDF); the series of spatial planning documents that

will replace the East Herts Local Plan Second Review 2007 (Saved Policies), and shape the future of East Herts to 2031.

- 1.2 The Core Strategy is perhaps the most important DPD as it is the overarching and strategic planning document for East Herts, identifying the District wide housing target, broad locations of growth and principles of development. It should be noted, however, that the Core Strategy will not deal with specific sites, other than those sites deemed to be of a strategic nature and central to the delivery of the Core Strategy itself. Instead it will identify broad locations for development to 2031. Importantly, the Core Strategy will establish the strategic planning context for subsequent LDF documents, such as the Site Allocations and Development Management DPDs, as well as any Neighbourhood Plans, prepared by parish councils.
- 1.3 There are a number of stages to the preparation of the Core Strategy involving various rounds of public consultation. The Issues and Options consultation is the first formal stage of consultation and followed community and stakeholder engagement in 2008 and 2009, which informed the content of the Issues and Options document. The next stage of preparation and public consultation is called the Preferred Options and is currently anticipated for spring 2012. Further information on the preparation of the Preferred Options is set out in the Preferred Options Project Plan and Methodology Statement, attached at **Agenda Item 7**.
- 1.4 The purpose of the Issues and Options consultation was simply to set out the issues facing East Herts and to present a series of options for dealing with those issues. Twelve weeks public consultation was held between 2 September and 25 November 2010 and a Summary of the Consultation Event is attached as **Essential Reference Paper B**; suffice to say that it was the most extensive public consultation carried out by East Herts Council on a planning policy document. Town and Parish Councils were sent copies of all of the consultation documents.
- 1.5 The consultation itself was structured around 43 questions, although a Summary Leaflet setting out the main issues and four of the questions was also produced and this was circulated to households alongside the autumn 2010 edition of the Council's LINK Magazine. The Summary Leaflet was also distributed to some businesses across the district.
- 1.6 For the first time, responses could also be submitted online. One

of the benefits of the online consultation portal is that once comments have been processed by Officers, they are available to view publicly online. For this reason, it is not considered necessary to include actual responses to the consultation in this report. Should Members wish to view the responses they can do so via the online consultation portal at <http://consult.eastherts.gov.uk/portal> and select the “who said what” icon. This report, therefore, simply summarises the main issues raised and analyses the responses received.

- 1.7 Acknowledgement should be given to all those unnamed individuals across East Herts who proactively encouraged fellow residents to participate and engage in the Issues and Options consultation.
- 1.8 In respect of campaigns, two local groups were particularly active. The Bishop’s Stortford Civic Federation encouraged residents to submit standard responses whilst the Stop Harlow North (SHN) campaign encouraged its supporters to submit standard letters, postcards and coupons. It should also be noted that the developer with an interest in land to the north of Harlow (Harlow North Joint Venture (HNJV)) sent leaflets to households across East Herts promoting the benefits of development to the north of Harlow to meet all of East Herts needs. For information, copies of the HNJV and SHN leaflets are attached as **Essential Reference Papers C and D**, respectively.

2.0 Report

2.1 **Statistical Analysis**

- 2.1.1 This report presents for consideration a summary of the issues raised to the Core Strategy Issues and Options consultation. A total of 3,398 individuals and organisations responded to the consultation, including 2,279 through the Stop Harlow North Campaign. Notwithstanding this, as can be seen from Figure 1 (below), the engagement of 1,119 individuals and organisations to an initial LDF consultation is still significant and compares favourably with neighbouring local authorities.
- 2.1.2 A statistical analysis of the consultation responses is attached as **Essential Reference Paper E**. As with all statistics, they must be read with caution as there is a danger that they can be taken out of context. Whilst they assist with interpreting the responses they do not provide the definitive answer. Thus, the

statistics are attached for information only and no discussion or further analysis is given. The statistical analysis:

- Presents aggregate numbers only: they do not reveal whether the planning arguments for or against a particular option are strong or weak;
- Is based on the options selected by respondents; therefore if the options selected by respondents contradict their written comments, these contradictions are not revealed by the statistics;
- Should also be considered alongside the comments set out in this report.

Figure 1: Neighbouring Authorities LDF Consultations

| Local Authority | Consultation | Number of people/ organisations responding |
|--------------------|---|--|
| Stevenage BC | Key Issues and Alternative Options | 78 |
| | Preferred Options | 61 |
| Hertsmere BC | Issues and Options | 200 |
| | Preferred Options | 100 |
| | Submission Draft | 45 |
| Broxbourne BC | Core Strategy Key Issues | 65 |
| | Core Strategy Preferred Options | 565 |
| Harlow DC | Issues and Options consultation | (Due July 11) |
| Uttlesford DC | Policy Choices and Options for Growth | 200 |
| | Preferred Options | 1671 |
| | Further consultation on Preferred Options | 2388 |
| Welwyn Hatfield BC | Core Strategy Issues and Options | 1500 (inc standard reps) |

2.1.3 Furthermore, some of the responses to particular questions or from particular settlements are quite small, and it therefore remains open to question as to what level of statistical significance should be attached to them. They are however presented for transparency and completeness. The presentation of the data has also entailed professional judgement with charts being selected based on both the potential meaningfulness of the information and clarity of presentation.

2.1.4 The analysis makes no attempt to attach significance to particular numbers. However, the numbers may attain significance when viewed alongside the range of information which will be considered when selecting a preferred development strategy. This package of work will be undertaken as part of the Preferred

Options stage in preparation of the Core Strategy. Further explanation of this work is contained in the Preferred Options Project Plan and Methodology Statement (see **Agenda Item 7**).

2.1.5 The statistical analysis attached at **Essential Reference Paper E** is split into three parts. Part I provides an analysis of the overall response showing who responded and how they responded. It includes the following charts:

- Overall response
- Total response showing private individuals and others
- Response by type of organisation
- Responses by source
- Response by source for East Herts Town and Parish Councils
- Respondents by settlement

2.1.6 The consultation was the first to be run online: as such, the 200 web responses are seen to be a positive achievement, entailing significant savings in staff time and resources. Officers hope to achieve an even greater proportion of web responses to future consultations, building on the experience gained as part of this consultation.

2.1.7 Part II provides a demographic analysis of the 110 (9.8%) respondents who chose to complete the monitoring form. The information collected included the following:

- Age group
- Gender
- Race/ethnicity
- Do you consider yourself to have a disability?
- Do you work in East Herts?

2.1.8 Although the number of respondents is quite small, this data has been included to show the type of information the Council has collected. In future the Council will seek to collect further demographic information, whilst balancing this against making it easy for people to respond to consultations efficiently. Analysis of demographic information is useful in that it can help ensure that future consultations reach as wide an audience as possible, reflecting the full range of views and opinions by being effectively targeted through the most appropriate medium.

2.1.9 Finally, Part III provides an analysis by consultation question

number. These results in particular must be read in conjunction with any comments made for each question. Total responses by question are given in the chart on page 18 of **Essential Reference Paper E**. This chart shows a significant boost in response for those questions included on the Summary Leaflet distributed to households and businesses. The charts also include some geographical analysis of responses for several of the questions where useful.

2.1.10 A large number of responses to Question 43 were received from the Stop Harlow North campaign, using one of their standard response forms and statistical analysis of these is presented for completeness. For information, a screenshot of the Stop Harlow North Campaign webform is attached at **Essential Reference Paper F**.

2.2 Summary Leaflet

2.2.1 The Issues and Options consultation was the first time the Council had actively distributed a Summary Leaflet, as part of a planning policy consultation. 72% of the responses to the consultation were made using the Summary Leaflet (excluding Stop Harlow North postcards etc).

2.2.2 The purpose of the Summary Leaflet was three-fold. Firstly, to raise awareness about the consultation; secondly, to try and target those households who do not normally engage in the plan-making process; and thirdly, to encourage those who do wish to engage to read the full consultation document and respond to the full questionnaire.

2.2.3 Concerns were raised by some residents that they had not received their copy of the Summary Leaflet. These concerns were drawn to the attention of the distribution company, and where this was an issue, re-delivery was undertaken as appropriate. Additional leaflets were also circulated to parish clerks and at a number of evening parish engagement sessions with East Herts Council's then Executive Member for Planning Policy and Transport. It should also be noted that the leaflet was distributed to the circa 53,000 households in East Herts, not its 135,000 residents.

2.2.4 The Summary Leaflet set out the main issues and four of the questions from the Issues and Options consultation document. Question 1 was Question 22 in the consultation document and sought responses on the Development Strategy Options A to F.

- 2.2.5 Question 2 was a composite of Questions 24, 27, 30, 33 and 36 from the Issues and Options consultation document and sought responses about the growth options for *each* town. However, 159 (18%) of respondents to the Summary Leaflet misunderstood this and ranked the five towns against each other, rather than the growth options for each town. Where contact details were provided as requested, respondents were sent clarification and the opportunity to re-submit their responses to this question.
- 2.2.6 Question 3 was Question 41 in the consultation document and sought responses on whether the correct villages had been identified. Question 4 was Question 43 in the consultation document and sought responses on the issue of development to the north of Harlow.
- 2.2.7 Valuable lessons have been learnt from the use of the Summary Leaflet. The fact that not every respondent was able to successfully complete the form means that even clearer instructions and presentation of material is required. Timing of the distribution also needs to be considered. Many of the concerns raised by residents in relation to non-delivery came some weeks after the leaflet had been delivered, following extensive publicity in local newspapers. If leaflets are to be used again, then they need to be delivered *following* a period of awareness raising and publicity in order for residents to look out for the leaflet when it is delivered.

2.3 Late, Anonymous and Other Responses

- 2.3.1 Although the end of the consultation period was 25 November, the Council has accepted comments received up to 31 December 2010. Since that date, further responses have been received including from English Heritage (28 January 2011) and the Bishop's Stortford Civic Federation (7 February 2011), the latter specifically in respect of the development of the Areas of Special Restriction (ASR) to the north of Bishop's Stortford. Additional letters in support of the Civic Federation's position have also been received from a number of Parish Councils around Bishop's Stortford. Whilst these comments cannot formally be taken into account as part of the Issues and Options consultation, Officers are aware of the issues raised.
- 2.3.2 A further 60 responses were received anonymously. Again these cannot be taken into account formally, although the issues raised have been noted. The reason for requesting

contact details is because the Core Strategy will form part of the statutory Development Plan for East Herts District and be examined by an Independent Inspector. Being able to relate comments to individuals/organisations provides the Council with an audit trail of the Core Strategy preparation process ensuring that all comments have been dealt with. It is also of benefit to residents and stakeholders as they can be kept informed on progress and notified of future consultations. This ensures that they do not miss further opportunities to have their say.

2.3.3 In November 2010 Planning Policy Officers also attended the East Herts Youth Conference seeking to raise awareness and engage school children in the plan-making process, specifically in respect of Question 22. Again, whilst the results cannot be taken into account formally, the responses have been noted.

2.4 Status of the East of England Plan

2.4.1 Members will be aware that the Issues and Options consultation was carried out during a period of some uncertainty in the planning system. On 6 July 2010, prior to the start of the consultation the Secretary of State for Communities and Local Government wrote to local planning authorities abolishing regional strategies including the East of England Plan.

2.4.2 Some respondents have therefore questioned, firstly, why the consultation was carried out, and secondly, why it was based on the East of England Plan that had recently been revoked? However, East Herts Council took the decision to proceed with the Issues and Options consultation for the following three key reasons:

2.4.3 Firstly, and most importantly the East of England Plan has not been revoked or abolished. The Secretary of State was challenged at the High Court and found to have acted *ultra vires*. Regional strategies can only be abolished by Act of Parliament and until the Localism Bill receives Royal Assent (expected in Autumn 2011 at the earliest) the East of England Plan remains extant. However, it should be noted that subsequent to the Issues and Options consultation a more recent High Court challenge has concluded that it is for local planning authorities to decide what weight to give to the Government's intention to abolish regional strategies. As a postscript to this, in May 2011, the Court of Appeal accepted 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.

2.4.4 Secondly, the Government has clearly stated that local planning authorities should continue to prepare local development frameworks, reflecting local people's aspirations and addressing important issues such as climate change, housing and economic development in their areas. Postponing the Issues and Options consultation until after the Localism Bill has been enacted would lead to significant delays to the plan-making process which could result in 'planning by appeal'.

2.4.5 Thirdly, as had been stressed throughout the run-up to the consultation and during the consultation itself, the Issues and Options is just the first formal stage of consultation. As such, the actual number of homes (as set out in the East of England Plan) is less important than identifying broad locations. If the number of homes required changes, then the Core Strategy can accommodate this in due course. The Issues and Options is a discussion document; it is not the final document.

2.5 East Herts Housing Requirement

2.5.1 In respect of the number of homes that need to be accommodated across East Herts by 2031 (known as the housing requirement), a number of respondents challenged both the need for any housing whatsoever and the assumption that the need was approximately 8,500. (This number being the 'to-find' figure based on the East of England Plan target of 660 dwellings per annum).

2.5.2 East Herts Council does not dispute the need to provide additional homes across the District to meet the needs of the existing and future population. The question, however, is what number of homes is required?

2.5.3 East Herts Council did not object to the District housing requirement as set out in the East of England Plan. Despite being "imposed from central Government", the housing figures in the East of England Plan are based on demographic forecasts and modelling. Furthermore, the East Herts figure was broadly similar with the previous Hertfordshire County Council Structure Plan 1991 - 2011 figure. As such, until further technical work is undertaken, East Herts Council has accepted the figure of 660 dwellings per annum.

2.5.4 Notwithstanding the above, in light of the impending abolition of the East of England Plan it is appropriate for East Herts Council to undertake technical work to assess the housing requirement for the District. This approach of a locally derived assessment of housing need has also been suggested by a number of respondents to the Issues and Options consultation and work is currently ongoing in this respect.

2.5.5 It is intended that the findings of this technical work will be reported to the next LDF Executive Panel, currently scheduled for November 2011.

2.6 Summary of Issues - Overview

2.6.1 The remainder of this report summarises the issues raised to the Core Strategy Issues and Options consultation. Unlike previous consultations, Officers have not responded to individual comments. Instead, the comments that have been received have been grouped together into relevant issues and it is these issues that will be used as the basis for the preparation of the next stage of the Core Strategy: the Preferred Options document. In identifying the issues, the comments have been subject to interpretation.

Figure 2: List of Essential Reference Papers

| ERP | Chapter | Question Number |
|-----|---------------------------|---|
| G | 1 - Background & Context | 1, 2 |
| H | 2 - Key Issues and Vision | 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21 |
| I | 3 - Development Strategy | 22, 23 |
| J | 4 - Bishop's Stortford | 24, 25, 26 |
| K | 5 - Buntingford | 27, 28, 29 |
| L | 6 - Hertford | 30, 31, 32 |
| M | 7 - Sawbridgeworth | 33, 34, 35 |
| N | 8 - Ware | 36, 37, 38 |
| O | 9 - Villages | 39, 40, 41, 42 |
| P | 10 - North of Harlow | 43 |

2.6.2 The following sections of this Report set out a 'snapshot' of the issues raised in order to capture the flavour of the comments to the Issues and Options consultation. Summaries are arranged by chapter and question. For a full appreciation of the issues raised for each question, please refer to the relevant **Essential**

Reference Paper (ERP) attached to this report, as shown in Figure 2 (above).

- 2.6.3 It should be noted that the comments made in response to the questions may not reflect the “results” of the statistical responses as set out in **Essential Reference Paper E**. As such, the summaries of the issues raised should be read alongside the statistical analysis.
- 2.6.4 A conscious decision was taken to base the consultation around a series of specific questions and not to have a question seeking ‘general’ or ‘any other’ comments. It was hoped that this approach would help focus the responses. This succeeded to a certain extent with those respondents who submitted comments using the online consultation portal having to submit all comments against one of the 43 questions. However, respondents submitting comments by email or letter were not subject to the same ‘restrictions’. When inputting email and letter responses onto the consultation portal (in order to ensure that all responses are publically available), Officers have endeavoured to place comments under the most appropriate question.
- 2.6.5 A number of comments, however, did not relate to the topics or questions being asked and as such, in order to upload them onto the online consultation portal for public viewing, an additional question has been created: Question 44. The summary of these miscellaneous issues is attached at **Essential Reference Paper Q**. Many of these comments concerned the consultation itself, including whether the Core Strategy would actually fit with local wishes.
- 2.6.6 Many comments naturally reflect the opinions and vested interests of the respondents. This is particularly the case in respect of identifying potential locations for development. It will be crucial, therefore, to ensure that any conclusions the Council draws in the preparation of its Preferred Options are based on legitimate planning considerations.
- 2.6.7 Notwithstanding the above, some of the comments related to the suitability or otherwise of specific sites. On the whole, whilst these comments are not relevant to the Core Strategy (which is concerned with strategic planning issues), these comments will be taken into account as part of the Strategic Land Availability Assessment (SLAA) technical work which is concerned with the

suitability of specific sites (see **Agenda Item 9**).

2.6.8 Some respondents misinterpreted the purpose of the consultation. The Issues and Options is not the final plan: it simply sets out the issues facing East Herts and presents a series of options for dealing with those issues. As the Core Strategy progresses it will evolve and the preferred approach will emerge.

2.6.9 This was especially the case in respect of the visions where it was felt by some respondents that the visions were too generic. Indeed, as the Council refines its options, these visions will become more precise and clearly set out what East Herts will be like in 2031. Work will also be undertaken to ensure that the visions are deliverable rather than purely aspirational. In terms of comments, notably, the Environment Agency noted that the visions would benefit from reference to managing flood risk and using new development to contribute to reducing existing flood risk, whilst the Hertfordshire Biological Records Centre has requested that the vision should protect the natural environment.

2.7 Summary of Issues - Chapter 1

2.7.1 The two questions in this chapter related to two accompanying technical documents that supported the Issues and Options Consultation: the Sustainability Appraisal Report and the Habitats Regulations Assessment, both prepared by Scott Wilson Ltd, consultants engaged by the Council to undertake such work.

2.7.2 A key area of concern raised throughout the consultation was the issue of infrastructure, both in terms of problems with existing provision (e.g. at capacity, inadequate) and the impact of new development on existing infrastructure (e.g. not being able to cope with increased demand). The issue of infrastructure provision is a crucial element of the plan-making process and in order for the Core Strategy to be found sound (i.e. fit for purpose) at examination, it will be accompanied by an Infrastructure Delivery Plan (IDP) setting out what infrastructure is required, when it will be built and, crucially, who will pay for it. The Preferred Options Project Plan and Methodology Statement (see **Agenda Item 7**) sets out the Council's approach to planning for infrastructure in greater detail.

Question 1: Sustainability Appraisal

2.7.3 In general, the majority of the responses to Question 1 were not specifically related to the sustainability appraisal document but to wider sustainability issues. Importantly, it was felt that the

sustainability appraisal needs to be re-assessed in the light of new evidence and changes to national and regional policy. This is particularly the case for housing and employment numbers and development to the north of Harlow.

2.7.4 Respondents felt that there were some conflicts between different objectives (i.e. the achievement of some objectives being to the detriment of others). There was also disagreement in some of the scores and conclusions given for some development options. The use of spatial areas as a method of assessing objectives was questioned as objectors felt it disguised the impacts on smaller settlements within a larger spatial area.

2.7.5 The areas that respondents were most concerned about and focused on were water infrastructure and the impact of development on natural resources and biodiversity. There was however, a lack of consensus on the correct approach to dealing with the categorisation and development of the villages, although there was support for allowing development in the villages in order to retain their vitality over the environmental concerns of building in the rural area. Importantly, respondents felt that the negative issues raised in the sustainability appraisal must be resolved prior to determining the development strategy.

Question 2: Habitats Regulations Assessment

2.7.6 It was commented that due to the location of the District's wildlife sites and sensitive habitats, there was a significant risk that inappropriate development could have both direct and indirect effects and cause detrimental harm to the quality of these areas. It was felt that more work will need to be done to ensure that these effects are understood and mitigated against, and in particular that water issues (scarcity, quality, disposal) are addressed as a priority before any new development takes place. Respondents also felt that the Habitats Regulations Assessment needed to be re-assessed in the light of new evidence and changes to regional and national policy.

2.7.7 In respect of green infrastructure, respondents felt that more should be done to buffer these much valued assets from the impacts of development through monitoring, education, stewardship, protection, expansion and enhancement programmes.

2.8 Summary of Issues - Chapter 2

2.8.1 Chapter 2 included a total of 19 questions designed to get feedback about the LDF Strategic Objectives, Policy Options and Vision for East Herts. Both the LDF Strategic Objectives and Chapter 2 were arranged by theme (see Figure 3). Each theme included two questions, the first looked at the purpose of the objectives themselves and the second looked at the approach to dealing with the policy options identified under each theme.

Figure 3: List of LDF Themes

- Theme 1 - East Herts Energy and Climate Change
- Theme 2 - East Herts People and Community Safety
- Theme 3 - Housing East Herts
- Theme 4 - East Herts Character
- Theme 5 - East Herts Economy, Skills and Prosperity
- Theme 6 - East Herts On the Move
- Theme 7 - East Herts Health, Wellbeing and Play
- Theme 8 - Green East Herts
- Theme 9 - East Herts Monitoring and Delivery

2.8.2 The LDF Strategic Objectives were identified through an analysis of the feedback from the awareness raising consultation in 2008. For reference, the LDF Strategic Objectives are attached as **Essential Reference Paper R**. Importantly the Preferred Options document will need to demonstrate how the Council's proposed approach meets these objectives.

2.8.3 Overall, there was general support for the Strategic Objectives, which covered the expected topics. However, some respondents expressed concern over whether they are achievable, whilst others sought stronger wording and more specific measures to be included. Doubts were raised as to the effectiveness of proposed policies and the willingness of East Herts Council to enforce strengthened policies, against pressure from developers.

Theme 1 - East Herts Energy and Climate Change
Question 3: LDF Strategic Objectives

2.8.4 It was pointed out that whilst development generally may be incompatible with climate change objectives, given the increase in emissions from cars and homes etc, the location and mix of development may also affect carbon emissions. There were also some concerns about the possible impact of climate change policies, for example, the visual intrusion of wind turbines,

pollution from biogas, and parking restrictions.

- 2.8.5 Respondents felt that reference should be made in ECC1 to various energy generation sources, energy efficiency at existing housing stock, home working, low carbon transport and linking air quality and carbon emissions. It was also suggested that targets for carbon savings should be included in the Core Strategy and not left to subsequent policy documents. In ECC2, mention should be made of habitat linkages/green infrastructure, and local food production.

Theme 1 - East Herts Energy and Climate Change

Question 4: Policy Options

- 2.8.6 Many of the issues raised were the same as those already dealt with under Question 3, although additional issues raised included the potential benefits of coppiced woodfuel for biodiversity as well as clean energy. It was also suggested that the Key Diagram should show the location of important biodiversity resources and proposed areas for enhancement. Onsite targets should be complemented by a requirement to offset all remaining emissions through a local carbon mitigation fund. Respondents also pointed out the need to consider scheme feasibility and viability.

Theme 2 - East Herts People and Community Safety

Question 5: LDF Strategic Objectives

- 2.8.7 Respondents commented that design standards produced by the Crime Prevention police architect are not currently adhered to which makes objective PCS1 meaningless and that the reference to 'reduce the fear of crime' should be removed as this goes beyond the controls of the planning system. There was strong support for PCS3 from Town and Parish Councils although there was still concern as to whether this objective could be achieved as it was felt that local views are often ignored in the determination of planning applications. Concern was expressed at the likely increase in population. It was suggested that household formation forecasts should be based solely on the trend in the resident population and internally generated growth rather than including inward migration figures. Comments were also made about the mix of housing and how this had affected the population balance, and concern was expressed about how the housing needs of an ageing population would be addressed.
- 2.8.8 It was suggested that existing community facilities needed to be enhanced and expanded, particularly in villages which have few useful facilities. Concern was specifically raised about the loss of

D1 designated sites which are a valuable asset to the community. There were a number of new objectives or additions to objectives suggested which link in with concerns expressed above including keeping the increase in population as low as possible and increasing the amount of affordable housing provided to maintain the population balance.

Theme 2 - East Herts People and Community Safety

Question 6: Policy Options

- 2.8.9 There was general support for the proposed approach and links identified with many of the other themes, with comments expressing clear support for policies to address housing mix, type and tenure to maintain mixed-age communities. However, the specific use of the word 'vibrant' was challenged due to confusion over its meaning. It was commented that new community facilities should meet the needs of all sectors of society and not specifically cater for disadvantaged groups. Particular emphasis was given to the need for a robust policy to protect D1 community facilities from redevelopment amidst concern that current policy has failed in this respect. It was felt that designing developments in an appropriate way to reduce crime and anti-social behaviour may be part of the solution but would not solve the problem.
- 2.8.10 Respondents also felt that a number of additional bullet points should be added to the Policy Options. Suggestions included policies to address: provision of mobile services to villages; support for local social infrastructure and culture in villages; specialised forms of older people's accommodation; the issue of 'fear of crime'.

Theme 3 - Housing East Herts

Question 7: LDF Strategic Objectives

- 2.8.11 The majority of comments concerned the housing target and its basis being the East of England Plan. Whilst this issue is dealt with elsewhere in this report (see Section 2.5 and 2.9), it is worth noting that as well as objection to the East of England Plan housing target, comments to this question included specific support (since it is founded on robust evidence and still part of the statutory Development Plan), as well as comments concerning any potential review and the consequences of reducing the housing target especially without robust evidence. It was also pointed out that basing the housing target on local needs could result in a higher figure than in the East of England Plan. Respondents also highlighted the relationship between housing and economic growth.

- 2.8.12 In respect of HOU1, respondents pointed out that any standards must be applied flexibly. There was also support for the objective to locate homes in sustainable and suitable locations although ensuring a mix of housing was considered important. There was support for objectives HOU3 and HOU4 relating to Gypsy and Travellers and specialist accommodation, although in respect of the former, it was noted that the policy context has changed in that the East of England Plan is being revoked. In respect of HOU5 (affordable housing), respondents pointed out that any target must be flexible, consider development viability, and based on the individual circumstances of each site. The issue of affordable housing for local people was also raised as well as greater reference to the Council's Strategic Housing Market Assessment (SHMA).

Theme 3 - Housing East Herts

Question 8: Policy Options

- 2.8.13 On the whole, the approach to the policy options was considered to be broadly correct although general comments were made against specific aspects of the objectives which are dealt with above. It was felt that an additional bullet point was needed in the Policy Options that referred to housing being located in sustainable locations including previously developed land and Green Belt sites adjacent to built-up areas.

Theme 4 - East Herts Character

Question 9: LDF Strategic Objectives

- 2.8.14 There was broad support for the Strategic Objectives although some concern was raised as to whether the objectives could be achieved in practice and strong disagreement at the suggestion that development north of Harlow could combine with the heritage of East Herts in a positive way. It was also felt that further consideration should be given to local historic environment data and Planning Policy Statement 5: Planning for the Historic Environment (PPS5). Comments were also made about the landscape character of a number of individual settlements.
- 2.8.15 It was suggested that CHA1 be amended to place a greater emphasis on the Rural Area beyond the Green Belt. Many respondents expressed support for the preservation of the Green Belt to prevent coalescence between settlements, although there was some support for a Green Belt review and acknowledgement that to satisfy the housing requirement, there may need to be some release of Green Belt sites. Hertfordshire County Council

commented that school sites should be removed from the Green Belt to aid the provision of additional educational facilities. New objectives to protect the Green Belt boundary with Stevenage and other major towns and to enhance the biodiversity of East Herts were suggested. There was a mixed response for objective CHA3 with some respondents showing strong support whilst others expressed concern that the wording of the objective was too prescriptive and that modern, contemporary design could complement the existing local environment.

Theme 4 - East Herts Character

Question 10: Policy Options

- 2.8.16 There was general support for the proposed approach, particularly with regard to the Green Belt, although there were comments that the policy options were too vague and contradicted the objectives. There was also concern that a policy that viewed the Green Belt as an absolute constraint could prevent the most sustainable development strategy for the district from being established.
- 2.8.17 It was commented that the landscape policy should contain reference to traditional orchards and that heritage assets identified at a local level should have the same protection in policy as nationally recognised assets. Some comments were made regarding the inclusion of minimum standards and parking standards in the policy addressing design of new developments. It was felt that an additional bullet point was needed in the Policy Options that referred specifically to the Rural Area beyond the Green Belt, and another to address the maintenance of open spaces within a settlement boundary in order to maintain the character of the settlement.

Theme 5 - East Herts Economy, Skills and Prosperity

Question 11: LDF Strategic Objectives

- 2.8.18 Respondents highlighted the need to recognise the link between the under-supply of housing (and consequent high prices) on the competitiveness of business in regard to the high cost of labour. This was combined with a need to ensure there is a degree of flexibility in economic policies that allow existing employers to expand/redevelop in order to retain their presence. It was felt that the objectives should acknowledge that supporting the rural economy is wider than simply allowing farm diversification since even the smallest village can be an appropriate location for general rural economic growth. It was also commented that the Council needs to be more supportive of the green economy and

the way green tourism and green industries can contribute to economic development and climate change mitigation.

- 2.8.19 There was also consensus amongst respondents that high quality environments encourage investment and help to attract and retain a suitable workforce. However, education and the need to assist the next generation of the working population was felt to be of vital importance. Hertfordshire County Council commented that there are locations in the district with an education capacity deficit which need to be addressed.

Theme 5 - East Herts Economy, Skills and Prosperity

Question 12: Policy Options

- 2.8.20 Comments included the need to ensure flexibility in economic policies, including retail, in order to maintain the retention and viability of existing locations. At the same time, it was felt that recognition should be given to the role of retail and leisure as major employment generators as well as the contribution made to the East Herts economy of employers in neighbouring towns.
- 2.8.21 Some comments were made about elaborating on the policy options and dealing with more of them in the Core Strategy rather than leaving important issues until future planning documents, including the approach to retail and leisure within both urban and rural locations as an important element of the economic profile of the district. Respondents also felt that the Council should work more closely with partners, including neighbouring authorities through a Local Enterprise Partnership, and large employers and educational providers to establish policies for achieving the district's economic potential.

Theme 6 - East Herts On the Move

Question 13: LDF Strategic Objectives

- 2.8.22 Whilst the aim to shift usage from the private car to other more sustainable means of transport was seen as laudable by respondents, the reality of a lack of alternatives was highlighted as an obstacle to achieving this. Dispersement of the population, reliance on the car, limited access to/reliability of passenger transport provision, difficulties associated with east-west travel across the District and capacity/peak crowding issues of trains featured high on the list of respondents concerns.
- 2.8.23 Also raised were issues in respect of the need to address car parking, congestion, existing road infrastructure and maintenance, and the need to do more to facilitate walking, cycling and

equestrian modes, including the need to manage recreational use in rural locations. In respect of OTM2 and the location of development in particular, whilst there was broad support for the principles and minimising the need to travel, there was also concern that this could detrimentally affect smaller villages. In respect of OTM6, Stansted Airport Ltd emphasised the positive role that the airport plays in facilitating local and international access and providing jobs. The Highways Agency wishes to work with both East Herts Council and Hertfordshire County Council on developing a transport evidence base.

Theme 6 - East Herts On the Move

Question 14: Policy Options

- 2.8.24 Whilst there was broad support for the Policy Options, many respondents believed that locating development in sustainable locations would result in development focused on the five towns or major transport routes, which may not be the right way forward. Some respondents requested that accessibility to key services and facilities be improved and maintained. In terms of future policy options, suggestions included: car sharing/car club schemes; airport access issues; the use of electric cars; maximising the use of waterways; improved cycling offer; community buses; improved passenger transport provision (especially in rural areas); park and ride provision; and other car parking matters.

Theme 7 - East Herts Health, Wellbeing and Play

Question 15: LDF Strategic Objectives

- 2.8.25 There was general support for the Strategic Objectives, including from Natural England. Whilst it was acknowledged that all new development should be supported by adequate facilities, concerns were raised over insufficient health facilities generally. Although there was specific support for HWP2, some respondents raised concerns over whether the Council should proactively support the diversity of faith communities, questioning the need for a separate objective. It was suggested that HWP5 should be amended to include reference to allotments together with access to the natural world. New objectives to protect village ways of life and to support the Living Landscapes initiative were suggested. It was commented that the role of the Lee Valley Regional Park will need to be strengthened at the next stage.

Theme 7 - East Herts Health, Wellbeing and Play

Question 16: Policy Options

- 2.8.26 There was general support for the proposed approach, including support from Sport England and Natural England. Particular concern, however, was raised that the Policy Options as drafted do not address the issue of protecting existing facilities (e.g. community, open space, sport and recreation) from other forms of development nor do they seek to ensure their continued viability. It was also suggested that the protection and enhancement of facilities should be dealt with in the Core Strategy and not left to subsequent LDF documents.

Theme 8 - Green East Herts

Question 17: LDF Strategic Objectives

- 2.8.27 It was felt that the Council should adopt a more proactive and stronger stance on all aspects of environmental protection, including water supply, processing and flood management. Waste management in general and in particular waste water and water supply are of great concern given the capacity issues and constraints of the current infrastructure and the threat of further developments exacerbating these issues. Concerns about the risk of flooding were countered by advocates suggesting using land at risk of flooding for development provided it meets the tests of Planning Policy Statement 25: Development and Flood Risk (PPS25).
- 2.8.28 Respondents commented that green spaces and allotments should be protected for recreational as well as ecological benefits and that Green Infrastructure is a vital part of the character of East Herts in protecting the District's ecology and countering the effects of climate change. It was felt that Green Infrastructure should, therefore, be given the greatest level of protection with enhanced measures to increase the land area of such spaces to provide buffering from development and increased human activity.

Theme 8 - Green East Herts

Question 18: Policy Options

- 2.8.29 British Waterways stated that Green Infrastructure should be given greater priority and detailed guidance on specific sites should be contained in the Core Strategy, as this is integral to decisions on the development strategy. Respondents also felt that the Core Strategy should raise the profile of wildlife sites, woodlands and traditional orchards, providing additional protection to sites of local significance. In addition, it was

suggested that a new policy option on the creation of new sites should be included. Comments also identified that water abstraction was a significant issue for the District's rivers, including their ecology and water supply, and that new developments exacerbate these problems. Natural England supported the proposed approach to Policy Options although respondents commented that infrastructure constraints, flood risk, and water consumption should be dealt with in the Core Strategy prior to determining the development strategy.

Theme 9 - East Herts Monitoring and Delivery

Question 19: Theme 9 - LDF Strategic Objectives

- 2.8.30 There was broad support with particularly strong support shown for MAD1. Comments were made that the existing infrastructure in the District is inadequate and significant concern was expressed over the timely provision and funding (especially in the current economic climate) of additional infrastructure to support development. Suggestions were made that detailed assessments of infrastructure requirements need to be carried out prior to any development and development should be made conditional upon the provision of the infrastructure to support it. The importance of considering growth in neighbouring districts to determine infrastructure provision was also raised. There was a mixed response to objective MAD3 with some respondents showing strong support and emphasising that developer contributions need to be enforced and subsequently used within the geographical area of the development. Other respondents felt that the viability of development proposals needed to be considered when addressing the use of developer contributions to achieve the outlined goals.

- 2.2.31 Comments were received from stakeholders including Thames Water, National Grid, the Highways Agency and Hertfordshire County Council as well as Hertfordshire Constabulary and Essex County Council expressing their wish to work with East Herts Council in the preparation of the Infrastructure Delivery Plan. Thames Water suggested specific policy wording that could be used in the Core Strategy to address 'Water and Sewerage Infrastructure Capacity/Development'.

Theme 9 - East Herts Monitoring and Delivery

Question 20: Policy Options

- 2.8.32 There was general support for the proposed approach, with a policy for infrastructure provision to accompany development regarded as being of major importance. Some respondents felt

that all of the bullet points raised were of sufficient importance to be included in the Core Strategy and not deferred to later documents. It was commented that the monitoring of key targets needed to include biodiversity and the maintenance and enhancement of the built and natural environment. It was stated that the monitoring framework needed to make clear how the policies would be prioritised as they could not all be achieved at the same time. Concern was expressed at the cost of monitoring so it was suggested that this should be carried out by central government or local voluntary bodies. It was suggested that mandatory requirements were put in place in respect of developer contributions as 'guidance' would fail to get the desired outcomes. However, some respondents felt that policy in this respect should be flexible to take into account the viability and therefore delivery of certain sites.

Question 21: East Herts LDF Vision

- 2.8.33 There was both general support and objection to the vision; the latter largely focused on seeking to ensure that the purpose of the vision is clear and it sets out how the Core Strategy will deliver change in East Herts, setting out what, where, when and how development will be delivered. A number of respondents stated that the vision should refer to the need to house the District's population and one respondent questioned the assumption that life in 2031 will be similar to life in 2011. Comments were also made in respect of the specific wording of the vision statements and amendments were suggested.

2.9 Summary of Issues - Chapter 3

- 2.9.1 Chapter 3 dealt with the District wide approach to development and included two questions on the broad locations for growth and how that growth should be distributed. It also included the following related topics. Although specific questions were not asked about these topics, a significant number of comments were received. These are being taken into account as appropriate.

- How many homes we need
- How many jobs we need
- Land availability, brownfield land, greenfield land
- The need to review the Green Belt

- 2.9.2 The issue of how many homes are needed is discussed in Section 2.5 of this report and it is also touched upon in the summaries to Theme 3 (Questions 7 and 8 - see Section 2.8 of this report). Notwithstanding this, it is worth reiterating that this issue

generated a strong level of opposition (to both the principle and extent of housing growth) as well as acknowledgment by other respondents of the socio-economic implications of housing provision and that housing is required to meet local needs, assist with housing affordability and sustain and promote local economic prosperity.

- 2.9.3 The relationship between housing growth and economic growth was also stressed by respondents in respect of new job provision. The reality of the jobs figure was also queried. This issue is also dealt with in the summaries to Theme 5 (Questions 11 and 12 - see Section 2.8 of this report).
- 2.9.4 The issue of land availability was raised by some respondents, including a preference for the re-use of empty properties and previously developed or brownfield land. This issue is closely related to the need to review the Green Belt, which was a very emotive topic.
- 2.9.5 Many respondents felt strongly that the Green Belt should be protected at all costs and as such, development should be located in locations outside of the Green Belt. Other respondents accepted that there would need to be some Green Belt releases in order for development to occur in sustainable locations such as around the four towns of Bishop's Stortford, Hertford, Sawbridgeworth and Ware. Buntingford is not in the Green Belt, and the distinction between Green Belt and greenfield land (i.e. undeveloped land) should also be noted.
- 2.9.6 The lack of availability of land within the existing settlements and the subsequent need for a Green Belt review was queried by some respondents who objected that the Issues and Options consultation had been based on the Call for Sites. Whilst the Core Strategy will not deal with specific sites, it must demonstrate that sufficient land will come forward for development within the identified broad locations in order to meet the district housing requirement. For information, the issue of land availability is considered in more detail in the separate Strategic Land Availability Assessment (see **Agenda Item 9**).

Question 22 - Broad Locations for Growth

- 2.9.7 Question 22 was perhaps the key question in the Issues and Options as it sought comments on the Development Strategy for East Herts. It presented six options (A-F) for distributing development across the District based on variations of the

following settlement hierarchy. This was a modified version of the hierarchy in the current East Herts Local Plan Second Review 2007 that identifies Six Main Settlements and Category 1, 2 and 3 Villages. The key difference being the treatment of the settlement of Stanstead Abbots and St Margarets which, for the purposes of the consultation, was 'demoted' from a Main Settlement to a Larger Service Village.

- Towns
- Larger Service Villages
- Smaller Service Villages
- Other Villages and Hamlets

2.9.8 In respect of the six options A-F, there were a considerable number of objections, including 172 standard responses organised by the Bishop's Stortford Civic Federation, commenting that "*none of the options are appropriate because they distribute a housing target that has been scrapped. Demand and its distribution should be based on population forecasts, infrastructure, the Green Belt protection and local employment prospects*". A number of alternative suggestions for generating a development strategy were made as well as a range of specific and non-specific locations.

2.9.9 Specific comments in support of, and objecting to each individual option were also made, often in disagreement, particularly Options A (Towns), D (Towns, Larger Service Villages, Smaller Service Villages, and Other Villages/Hamlets) and E (Towns, East of Stevenage and East of Welwyn Garden City). It should be noted that many respondents made specific comments in respect of the suitability of specific settlements in response to the questions in the settlement chapters (4-9).

2.9.10 Respondents in support of Option A (Towns) commented that with their existing services, facilities and infrastructure, the towns were ideal sustainable locations for development. Respondents that disagreed cited congestion, threats to the character of the town, and the burden on existing services. Option A was also opposed by those who felt that concentrating development in the towns would not meet the demands of rural communities. There was also strong support for Option B (Towns and Larger Service Villages) including striking a balance between supporting and accessing existing services in both towns and larger villages without placing too much pressure on the towns. There were

however objections, including from those who felt Option B would lead to overdevelopment in the larger villages.

- 2.9.11 There was both support and objection to Option C (Towns, Larger Service Villages and Smaller Service Villages) which was akin to the current Local Plan, although some respondents pointed out that it was not a true reflection of the Local Plan since the settlement of Stanstead Abbots and St Margarets was not one of the Six Main Settlements. Option D (Towns, Larger Service Villages, Smaller Service Villages and Other Villages/Hamlets) was considered to be perhaps the fairest approach although some respondents pointed out that it would result in development in unsustainable locations (i.e. villages with little or no services). It was felt that such an approach would not deny small settlements the chance to grow although the precise distribution to each settlement was considered to be crucial.
- 2.9.12 There was broadly equal support and objection to Option E (Towns, east of Stevenage and east of Welwyn Garden City) with respondents acknowledging the benefits of large scale urban extensions, but raising concerns with infrastructure (especially water), the relationship to the existing towns and impact on the Green Belt. Option F (Settlements within Transport Corridors) received the most number of objections from respondents concerned with the potential increase in car dependency and potential for urban sprawl and coalescence between identified towns and villages along the transport corridors.
- 2.9.13 From the responses it is apparent that there was no clear preferred option; rather locations need to be assessed as to their individual suitability, based on other capacity and constraint considerations. Indeed, ensuring development is sustainable was a key theme to emerge.
- 2.9.14 In respect of the settlement hierarchy itself, a number of respondents queried the categorisation of the settlements of Buntingford, Standon and Puckeridge, Stanstead Abbots and St Margarets, and Watton-at-Stone. In particular, it is commented that Buntingford is not comparable to the other four towns of Bishop's Stortford, Hertford, Ware and Sawbridgeworth, primarily because of its small size and absence of a rail link. Alternative suggestions include a preference for Stanstead Abbots and St Margarets (since it has a rail link) and the creation of a new tier of service settlements between the Larger Service Villages and the four towns.

2.9.15 Members will recall that 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. Whilst there was support for this approach, a number of respondents 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.

2.9.16 Members will note from **Essential Reference Paper I** that whilst many of the responses to Question 22 are related to the Development Strategy, they are not specific to the question itself. They are nonetheless important and these issues will be dealt with accordingly.

Question 23 - Approaches to Housing Distribution

2.9.17 This was perhaps the most abstract question in the Issues and Options consultation. The majority of respondents commented that no one approach was suitable, and that housing should be in the most sustainable locations based on an assessment of the capacity and constraints of the settlement. A number of respondents advocated a combination of approaches favouring approaches II (adjusted proportional distribution) and V (distribution by land availability), whilst others commented that housing should be distributed based on local needs. The focus of development on the towns was also questioned as whether it was the most appropriate way forward.

2.10 Summary of Issues - Chapter 4

2.10.1 Chapter 4 asked three questions in respect of options for Bishop's Stortford. It was commented that the town has reached its natural capacity and that there is no need for more new homes. Alternative approaches to development were also suggested. Whilst it was felt that the bypass sets a defined limit to development, concerns were expressed about the recent number of new flats, development in the Green Belt, infrastructure capacity, and adding to existing congestion in the town.

Question 24 - Growth Options for Bishop's Stortford

2.10.2 186 comments (including 145 standard Civic Federation responses) suggested that none of the options were suitable, and objected to the development of the Areas of Special Restraint

(ASR), which have already been identified for development. Option 1 (existing built-up area) received some support as the best option, although concerns were raised about flooding and existing levels of traffic congestion which could be exacerbated.

2.10.3 Respondents felt that Option 2 (northeast) is in a highly accessible location, has a strong relationship to existing employment and retail offerings, and could help to balance housing provision at the ASRs nearby, although concern was expressed about the impact on the character of Birchanger village and the integrity of Birchanger Wood. Respondents raised concern about the suitability of Option 3 (east) that it could lead to increased congestion at the gateway to the town, be noisy and polluted and result in harm to the visual separation of the town and M11. Concern was also raised that Options 4 (southeast) and 5 (south) could lead to coalescence with Sawbridgeworth.

2.10.4 In respect of Stansted Airport, it was noted that the airport is expected to grow to 35 million passengers during the plan period. It was also commented that Options 3, 4, and 5 would be affected by aircraft noise. Development should be avoided in areas of 60 decibels: Options 3 and 4 would be over 60, and Option 5 would be under 60 decibels. It was pointed out that since Options 2 and 4 lie within Uttlesford any planning decisions there sit with Uttlesford District Council.

Question 25 - Approach to Development in Bishop's Stortford

2.10.5 On the whole, respondents felt that quality of development is more important than density, and that sensitively designed terraces, townhouses and family houses are preferable to the recent trend for cramped 1 and 2 bedroom flats. Some respondents, however, pointed out that density is a site-specific issue that depends on the development strategy. It was also commented that higher density development which may involve the use of less land may make it easier to avoid areas of flood risk.

Question 26 - Bishop's Stortford Vision

2.10.6 Whilst there was support for the vision, several respondents stated that the draft vision is too idealistic and unlikely to be achieved. There were also concerns that the vision did not address the overall level of housing for the town and did not put enough emphasis on economic development.

2.11 Summary of Issues - Chapter 5

2.11.1 Chapter 5 asked three questions in respect of options for Buntingford. There was both strong support and strong opposition to the identification of Buntingford as a location for growth. Whilst it was favoured because of its rural location outside of the Green Belt, its small size, absence of a railway and limited range of facilities and services, meant that many considered that Buntingford is not comparable to the other four towns.

Question 27 - Growth Options for Buntingford

2.11.2 In terms of the growth options for Buntingford, there was support and objection to development in all locations. The issue of identifying defensible boundaries to development was raised as well as the issue of flood risk. Redevelopment of the former Sainsbury's Distribution Depot to the south of the town was both favoured (in terms of it being the only remaining source of brownfield land within the existing built-up area) and opposed, with opponents believing it to be poorly located for housing development, and in any case, should be retained for employment purposes.

Question 28 - Approach to Development in Buntingford

2.11.3 Responses to this question were more generalised with concerns being raised about the impact of higher density development, including in respect of ensuring adequate parking. Conversely though, HCC Passenger Transport Unit commented that higher densities are favoured because they can support commercially viable bus services. There was strong support for a range of densities to attract and retain a mixed population and housing styles.

Question 29 - Buntingford Vision

2.11.4 There was both support and objection to the vision for Buntingford, which it was felt needed to capture the essence of the town. The importance of protecting and promoting green space was highlighted whilst the reference to redevelopment of the former Sainsbury's site was also questioned by some respondents.

2.12 Summary of Issues - Chapter 6

2.12.1 Chapter 6 asked three questions in respect of options for Hertford. Significant issues raised in respect of Hertford included the need to protect the Green Belt and "Green Fingers"; physical and social infrastructure requirements; need to avoid the potential for coalescence; and the need to create a mixed housing stock.

Some respondents questioned the identification of Hertford as suitable for development and suggested alternative locations.

Question 30 - Growth Options for Hertford

- 2.12.2 There was a fair amount of disparity in the responses including a significant number commenting that none of the Options were preferred due to a number of issues, including increased pressures on already strained services and congested infrastructure, parking difficulties, potential coalescence between Hertford and other surrounding settlements, and the effect on the beauty and cultural heritage of the area. Alternative suggestions included the need for a bypass to accommodate new development; the reuse of commercial buildings for residential; and the possibility of tunnelling under Gascoyne Way.
- 2.12.3 A recurrent theme was the need to concentrate development on brownfield land although this should not be at the expense of employment land in the town. Option 2 (west) was the preferred option of both the Environment Agency and HCC Passenger Transport Unit (HCC PTU), due to the smallest amount of floodplain of any of the Options. HCC PTU also supported this approach as having the best potential to extend existing bus services although concern was raised by others in regard of potential coalescence, road capacity issues, detrimental effect on the Green Belt, and a lack of support from Hertfordshire Biological Records Centre.
- 2.12.4 Option 3 (north) received only limited comments with those in favour citing it as being more appropriate than building within the existing built up area. Objections were raised, however, in respect of the lack of transport links, the impact on existing road infrastructure and the issue of the Bengeo "rat run". Option 4 (south of Hertford) could be a suitable location for a new primary school which could be supported by the critical mass that new development in this location would bring. Whether the critical mass would be sufficient to make commercial passenger transport services viable in this potentially remote location was questioned.

Question 31 - Approach to Development in Hertford

- 2.12.5 Comments received favoured either a lower density approach (in order to restore the character of the town) or higher density development (in order to encourage social interaction and mutual support; movement by foot or bicycle; opportunities for decentralised energy; reduced land take; reduced heating demand; and public transport provision and other local

services/facilities). However, the majority of respondents favoured no specific approach commenting that density should be considered on a site specific basis; follow a mixed density approach in certain locations; and range from high density in the town centre and gradually reduce towards the extremities of the town.

Question 32 - Hertford Vision

- 2.12.6 Broad levels of support were received although some supporters caveated their response by questioning whether the aims could be achieved. The need for changing behaviours was identified as was the threat of the erosion of the town's character. In respect of the Mead Lane element, there was support for the regeneration of the area and also opposition from Hertford Town Council regarding regeneration involving major change of use.
- 2.12.7 Respondents (including the HBRC, Environment Agency and Sport England) also suggested that the vision should include additional issues such as acknowledgement of the need for greenfield/Green Belt development; protection of the natural environment (e.g. "Green Fingers"); the need to avoid development in the floodplain; need to strengthen character of the town; preservation of employment and shopping features; retention of trees; sustainable transport; and need to address playing pitch deficiencies.

2.13 Summary of Issues - Chapter 7

- 2.13.1 Chapter 7 asked three questions in respect of options for Sawbridgeworth. Traffic congestion was an issue along with other infrastructure constraints which respondents considered should be dealt with prior to determining the development strategy. Comments were also received in respect of the suitability of Sawbridgeworth as a location for growth.

Question 33 - Growth Options for Sawbridgeworth

- 2.13.2 There is as much support as opposition for development in all the potential growth directions. There was as much support as opposition cited for all of the growth options suggested for Sawbridgeworth, with a larger number of respondents indicating they would prefer to see no additional development in or around the town. Despite this, statistically the majority of respondents would prefer to see development contained within the existing built-up area (Option 1), although it was recognised that there is already congestion and infrastructure concerns and a lack of available locations for development.

2.13.3 Growth to the south west (Option 2) and west (Option 3) are almost equally preferred following the existing built-up area. Where development must occur on green field sites these should be located as close to the existing built-up area as possible ensuring they are well connected to the town centre and services. In respect of Option 4 (north), whilst it was suggested that land was available and could lead to improved passenger transport services, other respondents raised concern that this location was remote from the town centre and would lead to coalescence with Bishop's Stortford. A by-pass was suggested as a way of forming a new development boundary as well as easing the congestion within the town. Infrastructure capacity remains the biggest concern for all growth options, along with a desire to protect the character of the town, its valuable green assets and access to surrounding countryside whilst preventing coalescence between neighbouring villages and towns.

Question 34 - Approach to Development in Sawbridgeworth

2.13.4 Respondents commented that development density should be decided on a site by site basis and should be intrinsically linked to design, taking into account the local character of the area. Density should also consider local housing needs which suggest family sized homes are needed, which are likely to require larger sites. It was also recognised that higher density developments help to ensure the viability of services, prevent loss of green field land and areas of natural conservation value. However, it was acknowledged that sustainable communities contain a mixture of accommodation. It was also felt that it was vital that areas of flood risk are avoided.

Question 35 - Sawbridgeworth Vision

2.13.5 Respondents were generally supportive of the need to provide for new homes and development in the right locations that are well-connected to the town's existing infrastructure. The wider function of Sawbridgeworth as a service provider for surrounding villages and settlements was supported. Respondents wished to retain the town's character and avoid coalescence with nearby settlements. The town centre should be protected and enhanced but with an exploration into other uses that could support the town and draw visitors in. There was a desire to protect key wildlife areas and natural assets such as the Rivers Orchard and river/canal network. The efficacy of the emerging vision was also questioned although it was widely supported.

2.14 Summary of Issues - Chapter 8

2.14.1 Chapter 8 asked three questions in respect of options for Ware. Concerns were raised about the capacity of infrastructure to cope with more development; impact on the character of the town; and erosion of the Green Belt and possible coalescence with neighbouring settlements. Comments were also received in respect of the suitability of Ware as a location for growth, with alternative development options suggested.

Question 36 - Growth Options for Ware

2.14.2 It was commented that brownfield development should be prioritised, but acknowledged that there is a shortage of such land within the town. There was also concern that development in the existing built-up area (Option 1) should avoid adding to congestion in the town centre. Whilst it was felt that Option 2 (north) would be accessible by public transport and have good road access to the A10, it was noted that the “Nun’s Triangle” area is part of a registered garden and the area between Wodson Park and High Oak Road is well used by local residents for walking and local events. One respondent raised concerns about cost effective sewerage provision in the High Oak Road and Musley Hill area, although Thames Water is unable to comment until more detailed information on proposals is available.

2.14.3 Whilst Option 3 (east) poses minimal flood risk, concerns were raised that without significant new road infrastructure, development in this location could cause congestion in the town centre. It would require new or diverted bus routes. There were also concerns about the impact of development to the south-east (Option 4) on the Lee Valley Regional Park, the floodplain and associated ecology and wildlife, and coalescence issues with Stanstead Abbots. In respect of Option 5 (southwest), there was disagreement regarding sustainability, accessibility, integration with the town, parking and traffic congestion, coalescence with Hertford, use of the recreational facilities and whether sensitive design could mitigate these concerns.

Question 37 - Approach to Development in Ware

2.14.4 Whilst it was commented that higher density development would minimise land take, concentrate homes near services, and avoid any coalescence with neighbouring settlements, the flood plain and wildlife sites, the medium density option had the support, amongst others, of the Ware Society, wanting to maintain the character of the town and avoid high density. A low density approach was favoured by those seeking family houses and

better living conditions. The highest level of response, however, was received from those that did not wish to support any specific density; thought that density should be considered on a site specific basis; and thought that density should be determined by existing neighbourhoods to allow range of property types to be built.

Question 38 - Ware Vision

- 2.14.5 The majority of respondents supported or partly agreed with the Vision for Ware. The aspirational nature of the Vision was noted along with the need to restrain growth to achieve it. Sport England commented on the need to address deficiencies identified in the playing pitch strategy; Hertford Regional College suggested wording to accommodate higher educational provision in the town; and changes to wording were also suggested by the Lee Valley Regional Park Authority. Other comments concerned the need for the expansion of retail and business concerns in Ware.

2.15 Summary of Issues - Chapter 9

- 2.15.1 Chapter 9 asked four questions in respect of options for the villages. Three types of village were identified: Larger Service Villages, Smaller Service Villages and Other Villages/Hamlets, although a new category of village was suggested, based on villages with railway stations (e.g. Stanstead Abbots and Watton-at-Stone), thereby offering sustainable travel options. It was also suggested that the Core Strategy should consider a development strategy that would allow a more nuanced approach to the level of development that each settlement is allocated, based more closely on the principles of sustainable development.

Question 39 - Approach to Development in the Villages

- 2.15.2 Rather than taking a blanket approach to development, it was considered that density should be determined on either a site by site or village by village basis, and that design should take precedence over any artificial notions of minimum density. Some respondents also suggested that communities should be allowed to decide what is most appropriate for their village.

Question 40 - Identifying Types of Villages

- 2.15.3 Whilst there was some support for identifying three types of villages, the key concern raised was that the approach is too general and that villages should be considered individually, having regard to access to services and sustainability criteria, not just size and range of facilities. It was suggested that consideration needs to be given to the potential of smaller villages/hamlets to

evolve through accommodating growth and thereby avoiding a 'sustainability trap'. The role of neighbourhood planning and community right to build was referred to.

Question 41 - Village Identification

- 2.15.4 The majority of respondents commented on whether a particular village had been correctly identified. The village attracting the most comments was Braughing (where it was felt that it had been incorrectly identified as a Larger Service Village). A number of other villages were suggested as either Smaller or Larger Service Villages. Several respondents felt that they could not comment on the Other Villages/Hamlets as these had not been specifically listed in the consultation document. It was also requested that the basis for identifying each village should be published. Whilst a number of respondents did not want to see any development in the villages, some respondents felt that each village should accommodate a small amount of development.

Question 42 - An emerging Vision for the Villages

- 2.15.5 Whilst there was some support for the emerging visions, a number of respondents felt that they were too broad-brush given that each village is unique, too cautious and lacking in imagination, and would not protect the character of villages. It was also suggested that the Larger Service Villages should each have their own vision, informed by local Parish Plans / Village Design Statements. The Environment Agency was concerned that there was no mention of flood risk in any of the visions.

2.16 Summary of Issues - Chapter 10

- 2.16.1 Chapter 10 dealt with the issue of development to the north of Harlow. Growth in this location was specifically identified in the East of England Plan, as being separate and in addition to growth for the rest of the district. As required by the East of England Plan, an appraisal of planning and transport options was required to be undertaken in order to inform the preparation of LDF documents. Consultants were engaged on behalf of East Herts, Epping Forest and Harlow Council's to undertake this technical work, paid for by Government Growth Area Funding (GAF).
- 2.16.2 The Stop Harlow North campaign (SHN) has been active in its opposition to development in this location and encouraged its supporters to respond to this consultation using standard response worded webform and postcard. **Essential Reference Paper F** is a screenshot of the Stop Harlow North Campaign webform which sets out six statements of objection. The vast

majority of respondents indicated their agreement to all of these statements, although a small number disagreed with point 5. It should also be noted that the developer with an interest in land to the north of Harlow (Harlow North Joint Venture (HNJV)) sent leaflets to households across East Herts promoting the benefits of development to the north of Harlow to meet all of East Herts needs. For information, copies of the HNJV and SHN leaflets are attached as **Essential Reference Papers C and D**, respectively.

- 2.16.3 There were two parts to Question 43 and the responses to these are set out below. Part a. asked whether respondents agreed with the consultants suggested approach and Part b. asked, in light of the impending abolition of the East of England Plan, if development to the north of Harlow was no longer required by the East of England Plan, should this location be considered to meet some of East Herts District requirement.

Question 43a - North of Harlow Consultants Suggested Approach

- 2.16.4 Many detailed arguments for and against development north of Harlow were made, several of which covered points discussed at the Regional Plan Examination in Public in 2006. Most support for the proposals came from those living further away. It was also pointed out that development north of Harlow would assist with the Government's agendas for higher rates of house building and for growth and investment in East Herts as well as Harlow.
- 2.16.5 Concerns were raised about how the proposed development would integrate with Harlow; the deliverability of infrastructure and new jobs; water resources; traffic congestion (particularly on the A414, A1184 and in the villages); loss of Green Belt land; and about the impact on the character of the villages and the countryside. There were differing opinions on the effect of development north of Harlow on other East Herts towns and villages, and also differing opinions on the sustainability benefits of large-scale development generally.
- 2.16.6 Respondents also questioned the fit with the localism agenda and suggested that since the Government has announced its intention to abolish the RSS, Policy HA1 is now irrelevant. Several respondents pointed out that, without the RSS in place, Option C as set out in the Consultants' study (which did not include development to the north of Harlow) would form the Consultants' Suggested Approach.

Question 43b - North of Harlow District-wide Requirement

- 2.16.7 It was argued by some respondents that with the demise of the East of England Plan, the area north of Harlow potentially offers an opportunity for East Herts Council to locate all 8,500 dwellings to 2031. This could have the advantages of: a) preserving the towns and villages elsewhere in the district, b) reducing risk of non-delivery inherent in multiple small sites c) facilitating infrastructure delivery more effectively than would be possible through incremental growth at numerous locations d) and contributing to the important sub-regional role of Harlow in the London Arc.
- 2.16.8 On the other hand, respondents commented that a large development north of Harlow would: a) damage the character of the District and local villages if it became the area became a 'sink' for the District housing requirement b) would be impossible to fund the infrastructure requirements of what is effectively a new settlement c) the lack of barriers to development north of Harlow would effectively entail loss of control over development for generations to come and d) it does nothing to meet local needs or wishes.
- 2.16.9 It was argued that whilst there is no definable outer limit to development until the A120 is reached, a northern relief road/M11 link could provide a northern boundary to the development. Respondents also commented that smaller-scale development north of the Stort would relate better to Harlow and cause less damage to the countryside and character of the district.

2.17 What Happens Next?

- 2.17.1 The next stage of the Core Strategy is called the Preferred Options and is essentially the Council's draft plan for the district. The issues raised to the Issues and Options consultation that have been summarised in this report will be used to inform the Preferred Options.
- 2.17.2 Further information on the methodology for preparing the Preferred Options Project Plan is set out in **Agenda Item 7**. Importantly, the Preferred Options Project Plan will set out the further technical assessments that need to be undertaken as part of the preparation of the Core Strategy. As explained in Section 2.5 of this report, this will include further technical work in respect of the District housing requirement.

3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper A**.

Background Papers

Local Development Framework Executive Panel 27th May 2010 -
Agenda Item 5: LDF Core Strategy Issues and Options Consultation
Document (May 2010)

<http://www.eastherts.gov.uk/index.jsp?articleid=13789>

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ESSENTIAL REFERENCE PAPER 'A'

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| <p>Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):</p> | <p>Pride in East Herts <i>Improve standards of the built environment and environmental management in our towns and villages.</i></p> <p>Shaping now, shaping the future <i>Safeguard and enhance our unique mix of rural and urban communities, ensuring sustainable, economic and social opportunities including the continuation of effective development control and other measures.</i></p> <p>Leading the way, working together <i>Deliver responsible community leadership that engages with our partners and the public.</i></p> |
| <p>Consultation:</p> | <p>Consultation with the community and stakeholders is a key requirement of DPD preparation. Issues and Options consultation was the first formal stage of ongoing engagement. The Preferred Options stage will involve statutory public consultation.</p> |
| <p>Legal:</p> | <p>It is a statutory duty under the Planning and Compulsory Purchase Act 2004 for East Herts Council as the local planning authority to produce and keep up-to-date sound and robust Development Plan for the district. The Core Strategy will become the key document in the Development Plan.</p> |
| <p>Financial:</p> | <p>The preparation of the Core Strategy is being funded from the Planning Policy / LDF Upkeep Budgets, which includes covering the costs of various stages of public consultation and independent examination.</p> |
| <p>Human Resource:</p> | <p>Existing Planning Policy staff resources will continue to manage the preparation of the Core Strategy.</p> |
| <p>Risk Management:</p> | <p>Failure to consult with the community and stakeholders and demonstrate how their views have informed the preparation of the Core Strategy could result in the Core Strategy being found unsound or not fit for purpose at independent examination.</p> <p>In order to be found sound the Core Strategy should be based on technical evidence and the views of the community and stakeholders.</p> |