

ESSENTIAL REFERENCE PAPER 'G': CHAPTER 1 - BACKGROUND AND CONTEXT

Question 1: Sustainability Appraisal

Do you have any comments on the Core Strategy Sustainability Appraisal?

72 people/organisations provided comments in relation to Question 1. These included:

- 27 Individuals
- 22 Developers/landowners/agents/businesses
- 15 Stakeholders/organisations including:
 - Bishop's Stortford Civic Federation
 - Buntingford Civic Society
 - East Herts Gospel Hall Trust
 - Environment Agency
 - Epping Forest District Council
 - Harlow District Council
 - Hertfordshire County Council – Environment
 - Hertford Gospel Hall Trust
 - Jehovah's Witnesses
 - Natural England
 - Parsonage Residents Association
 - Rivers Nursery Site & Orchard Group
 - RSPB
 - The Woodland Trust
 - Transition Hertford
- 8 Town and Parish Councils including:
 - Aston
 - Brickendon Liberty
 - Hertford Heath
 - Hertford Town
 - High Wych
 - Tewin
 - Thorley
 - Watton-at-Stone

Q1 - Summary Comment	Q1 - Detailed Comment
General support	<ul style="list-style-type: none"> • Welcome the 'whole plan' methodology adopted, including social and economic issues, including accessibility to education for all the community via all sources • Appears detailed and assesses appropriate topics. We expect it will become more detailed in later stages of the Core Strategy • NE generally supportive and does not dispute any conclusions • Despite being superseded by the revocation of the EEP it is still valuable for its data and reasoning on many aspects. • Welcome steps to a broader understanding of rural sustainability – not just reducing private car use but around social and economic issues
General objection	<ul style="list-style-type: none"> • SA too long and complicated, with information lost among the volume. • Some assumptions seem too simplistic • Questions over its strength and status or whether issues will be disregarded under developer pressure and government targets • Limited interrogation between the SA and HRA – therefore missed opportunity to ensure a thorough assessment of the Core Strategy's environmental affects. • Use of 'may' or 'could' lead to uncertainty. • Putting non-town settlements into categories does not work. • Level of understanding into rural accessibility is not sufficient
Missing factors SA should consider	<ul style="list-style-type: none"> • The impact of building more houses on Crime rates • No reference to designing out crime • Should be more forward-looking and consider the strategic issues and consequences of not providing sufficient housing post-recession such as affordability and socio-economic and environmental factors. Need to stabilise housing markets • Little recognition of the need to provide allotments and burial land • SA should appraise Approaches I, II and V and all future approaches • Agricultural land survey to ensure only lowest grade agricultural land is developed, thus protecting the best. • Contaminated land should not be avoided but cleaned up and reused. Should reference CL:AIRE Code of Practice • Need to take account of EA Source Protection Zones (SPZ1) designations and protect these zones from certain types of development • Minerals reserves not scoped or included - particularly potential sterilisation at potential development directions inc N Harlow • Significant mitigation measures for impact on water resources, river networks and transport modes have not been identified • Potential for freight transport via waterways should be discussed as a way of relieving congestion • Green Belt review not needed as part of EEP but should be done in conjunction with other housing/land allocation assessments
Infrastructure Issues	<ul style="list-style-type: none"> • If we cannot afford the infrastructure or development results in deterioration of assets and resources we should not build. • Infrastructure and increases in services should occur prior to house building • The lack of, or failure to provide infrastructure will determine whether and where houses will be built • Transport infrastructure is wholly inadequate for existing never mind new housing
Water infrastructure	<ul style="list-style-type: none"> • Issues around water and flood management – should seek to save, store and treat excess water to help resolve existing water scarcity issues and prevent exacerbation of issues through new development. • No recognition of the over-licensed or over-extracted status of existing water supplies in the area, which are harming ecology and biodiversity. Need an action plan and safeguarding policies to manage water infrastructure as a matter of urgency • Option E should not occur. EEP SA 2004 states Stevenage has a severe lack of available water resources due to over-extraction and poor ground water regime

Q1 - Summary Comment	Q1 - Detailed Comment
	<ul style="list-style-type: none"> • Need more local treatment of waste water to reduce loss of water flow to local rivers
Climate Change	<ul style="list-style-type: none"> • Section should be expanded to include delivering SUDs, flood prevention (including fluvial) and mitigation, sequential approach to land allocation (PPS25), low carbon energy infrastructure and energy efficiency and renewable technology plus reducing dependency on imported oil - "peak oil" issues – Sustainable Energy Security, Strategic Risks & Opportunities for Business (Lloyds of London) and Zero Carbon Britain 2030 (CAT). • Need to consider Hertfordshire Renewable and Local Carbon Energy Technical Study (July 2010) and refer to Climate Change Act 2008. • Should look towards more sustainable options of change including refurbishment of existing housing stock, creating harmony between environmental, social and economic needs. EH should be proactive in sustainability agenda acting as an exemplar, and should seek to shorten the distance between production and consumption. Part of the Big Society should include local self-sufficiency • Should assess the carbon emissions for EH and each of its settlements • Welcome reduction of emissions through sustainable construction. Consideration could be given to the type of heating system supplied
Wildlife / biodiversity Objectives	<ul style="list-style-type: none"> • Theme 8, GRE2 – too narrow an approach which lacks ambition. Change to: 'To protect and enhance designated wildlife sites, local biodiversity and promote networks of green infrastructure as a haven for wildlife as well as recreational amenity.' • Conflicts and incompatibilities between Strategic Objectives need to be resolved – the biodiversity and climate change objectives should not be compromised by housing development allocations. • Ancient woodland should be given absolute protection – 4.5% of EH covered by unique, valuable and threatened asset. • Traditional orchards are a priority habitat in the UK BAP and should be given greater protection • Revised BAP targets and consultation PPS on Natural and Healthy Environment need to be referred to. • Should consider the findings of the WWF report Riverside Tales, the Natural Environment and Rural Communities Act 2006. Should link better to Herts 2021 and EH SCS • Not enough emphasis on developing strategies to foster greater biodiversity, which affects global ecosystems more than carbon emissions • Options B, C and D are preferable because they provide the flexibility to incorporate GI features and avoid negative effects on biodiversity. • All possible mitigation measures highlight the devastating and unsustainable consequences for the habitats and character of EH • Green Belt philosophy should be maintained, GB particularly by Stevenage towards Aston, Walkern and Datchworth.
Faith and religion	<ul style="list-style-type: none"> • Support the Equality Impact Assessment in principle – identification of age, religion and or belief, equal provision for different faith groups and expand the facilities for worship and voluntary sector • Object to the screening out of religion and belief (Para 14.2.9) believe it is likely to result in the failure to make adequate provision for new places of worship. • Faith is an important contributor to wellbeing
Community/ social	<ul style="list-style-type: none"> • Welcome recognition of age as a key issue • Welcome stakeholder engagement undertaken, urge for more with disengaged groups and voluntary groups to ensure final plan is sound. • Consultation omits consideration of social issues such as rising costs of transport and living, ageing population, pressure towards centralising services – will lead to residents being trapped in their homes and a flight from village to town • Welcome recognition of education as a key factor of wellbeing and part of providing inclusive communities. SA and Core Strategy should embrace private education

Q1 - Summary Comment	Q1 - Detailed Comment
	providers
Bishop's Stortford Growth Options – pro development	<ul style="list-style-type: none"> • Bishop's Stortford- does not assess small GB releases (i.e. school sites), which would not jeopardise the purpose and function of the GB. • ASRs should be considered for development in the event an application is not forthcoming prior to the adoption of the CS.
B.S. Anti Option 2 (north east)	<ul style="list-style-type: none"> • Contains Birchanger Wood – “a place of quality” a “lung” to be preserved in perpetuity (Woodland Commission)
Buntingford Growth Options	<ul style="list-style-type: none"> • Scott-Wilson's comments lack vision and misread landscape impacts of developing to the east • Homes and jobs should be in balance
Hertford Growth Options	<ul style="list-style-type: none"> • Conflicts between consultant's tentative views and assertions in the I&O (6.3.26 I&O and 9.3.6 SA). • growth direction labels are incorrect • Option A, E and F are stated as positive for Hertford-Ware area but this takes no account of the negative impact of a moratorium of development on Hertford Heath as a larger service village
Hertford – pro Option 1 (built up area)	<ul style="list-style-type: none"> • Should be preferred • Avoid Green Belt development
Hertford – Pro Option 2 (West)	<ul style="list-style-type: none"> • Should be preferred • There is adequate PT networks so development should not add too much private car use. Both stations could be walked to from here
Hertford – anti Option 3 (north)	<ul style="list-style-type: none"> • Omits mention of green fingers, nature reserves, river networks and issues of traffic congestion and terrain
Hertford – Pro Option 4 (south)	<ul style="list-style-type: none"> • Would not create coalescence if to the west of Brickendon Lane. Sites to the south are well-connected and accessible and close to a secondary school. • Least damaging of Green Belt development options
Hertford – anti Option 4 (south)	<ul style="list-style-type: none"> • Would cause coalescence between Hertford and Hertford Heath
Sawbridgeworth /High Wych Growth Options	<ul style="list-style-type: none"> • Growth options score are inconclusive for all directions. • Does not acknowledge that all sites proposed are on Greenfield sites which it considers as negative. • All options could be made more acceptable by ensuring links to existing transport system
Sawbridgeworth – anti Option 1	<ul style="list-style-type: none"> • Stated as most sustainable apart from effect on Rye Meads and historic environment • Option 1 takes no account that it is undeliverable – no sites left without contamination or viability issues and would lead to increased congestion.
Sawbridgeworth – pro Option 2	<ul style="list-style-type: none"> • Option 2 would use least quality (Grade III) agricultural land. • If no Harlow North then Option 2 could be delivered with no coalescence, otherwise coalescence would occur • Option 2 is highly accessible though they must ensure proposals incorporate strong links to transport system.
Sawbridgeworth – anti Option 2	<ul style="list-style-type: none"> • High Wych – dispute findings of Table 24 – options 2 and 3 would have significant negative effects on High Wych.
Sawbridgeworth – Pro Option 3	<ul style="list-style-type: none"> • Option 3 is the best – Rivers Nursery site redevelopment (see Call for Sites submission). Assessment too narrow in dismissing transport related attributes of west of Sawbridgeworth. Should score positive and negative rather than major significant effects. • Developers maintain that ecology issues have been addressed at the site. Biodiversity issues would need assessing. • Would not cause coalescence with Harlow or High Wych • If providing a mixed use development of Hospital improvements, retirement and residential properties, open space, allotments and nature reserve should score positive on community and wellbeing, economy and employment, historic

Q1 - Summary Comment	Q1 - Detailed Comment
	environment and housing.
Sawbridgeworth – anti Option 3	<ul style="list-style-type: none"> Option 3 and 4 would cause the loss of Grade II (good) agricultural land,
Sawbridgeworth – anti Option 4 (<ul style="list-style-type: none"> Option 4 would cause coalescence with Bishop’s Stortford Through traffic in Sawbridgeworth is the main cause for congestion and should not be allowed to influence decisions relating to the potential development of Sawbridgeworth itself (i.e. Rivers Nursery)
Ware – Pro Option 2 (north)	<ul style="list-style-type: none"> Large urban extension might reduce the gap between Ware and Wareside and Thundridge but would not cause coalescence as a significant green wedge would remain. Advocated in call for sites submissions
Ware - Pro Option 3 (east)	<ul style="list-style-type: none"> Might reduce the gap between Ware and Wareside but would not cause coalescence. Advocated in call for sites submissions Dispute SA stating there would be an impact on an open space, as this site is under-utilised and proposals would be to enlarge and improve this site. Lack of evidence on the potential impact on the rural economy due to loss of agricultural land. Purchase of the land would provide the landowner with money to invest in his business.
Ware – anti Option 5 (south west)	<ul style="list-style-type: none"> Dispute SA stating this would have a positive effect on employment as part of this land that would be developed is a golf course
Impact on villages and rural area - pro development	<ul style="list-style-type: none"> SA does not address the impacts of moratoriums on villages through Options A, E and F. Preventing development in the villages would only increase the effects of dormitory settlements - lack of affordability and lack of employment opportunities – forcing out-commuting, resulting in further loss of social networks and economic prospects for village services. Growth in villages (particularly larger service villages) would facilitate self-containment, accessibility to services, capture planning gain, prevent the need for agricultural diversification to provide economic opportunities regardless of their rural locations Dispute SA Options A and E would restrict growth in total areas but Option B would have a positive impact on High Cross as it directs growth to larger service villages If no Harlow north, Hunsdon could be developed Dispute SA 6.2.3 and 6.2.4 stating development in villages along A1M corridor would increase car use. Illustrates unsuitability of categorising villages by size rather than individual circumstances and geographic environment Villages close to larger settlements (Walkern to Stevenage) should be considered as reasonable alternatives for housing and employment development as they are more likely to have access to public transport networks and options such as car-sharing etc Does not appear to differentiate between smaller rural settlements and larger service villages except in transport terms. Smaller villages should ensure development is tailored to their needs, not say no to development entirely We should ask how will development add to or diminish the sustainability of this community. (Taylor Report) Particularly for housing, affordable housing and economic development, which should be assessed individually SA is too narrow in terms of the rural economy – affordable housing being linked to the needs of rural businesses through allowing seasonal agricultural worker accommodation – there is more to rural economy than agriculture Village location should not hamper business development, also applicable to larger businesses moving out of the district
Impact on villages – against development	<ul style="list-style-type: none"> Development in villages does not halt the decline of village services, just increases mileage by private car. Report under-estimates development effects on rural areas Does not appear to differentiate between smaller rural settlements and larger service villages except in transport terms.

Q1 - Summary Comment	Q1 - Detailed Comment
	<ul style="list-style-type: none"> • SA does not address impacts of development options on the small service or other villages. Not an accurate assessment. • Brickendon should be classified as an “other village” rather than “small service village” due to no services and weight restrictions on roads
Pro- Harlow	<ul style="list-style-type: none"> • Does not consider the socio-economic and infrastructure advantages of developing north of Harlow at different levels of growth – Harlow’s regeneration etc, rather than focussing simply on the negative environmental impacts. • Should consider the implications of locating strategic development elsewhere which EH could not gain from before appraising • Does not address the opportunity to build upon existing infrastructure located at Harlow, less of an impact on congestion and sustainable travel modes than other options. • All response from Harlow District Council – joint benefits, inter-dependency, duty to co-operate etc.
Anti Harlow	<ul style="list-style-type: none"> • Any development N of Harlow cannot be positive for sustainable transport and affordable housing.
Spatial Areas Approach	<ul style="list-style-type: none"> • Not appropriate as it generalises issues facing these areas, which are not necessarily applicable to all the locations within them. E.g. Thundridge which is a rural area village but relates to Ware also and Spellbrook vs. Bishop’s Stortford and Sawbridgeworth. • Villages located within the urban spatial areas are effected by issues facing the rural area as much as the urban • Each option has a different impact on each spatial area, sometimes contradictory
General	<ul style="list-style-type: none"> • Wherever you build homes people will use their car even for short distances. There seems to be a presumption that if you live in a town you will behave differently to someone who lives a short distance away.

Comments received to Q1 in respect of other Chapters

Chapter 3: Development Strategy

Q1 - Summary Comment	Q1 - Detailed Comment
Revocation of RSS	<ul style="list-style-type: none"> • Will need to be revised in the light of the Government's intention to revoke the East of England Plan – major developments (Stansted Airport and Harlow), housing targets and evidence • Housing requirements should be based on bottom-up approach informed by issues raised in SA and HRA and evidence base
Alternative Options - Against development	<ul style="list-style-type: none"> • Question need for 8,500 dwellings and per annum calculation • Based on flawed assumption that more homes are needed. One option should be not to build at all. • Not building north of Harlow should be a reasonable alternative and should undergo SA process • Para 6.1.1 should state that there are no alternatives if this is the case and give the reasons
Alternative Options for development	<ul style="list-style-type: none"> • Using existing housing/accommodation that is vacant/under-utilised in all sectors. • Small-scale GB releases in locations other than main directions of growth are a reasonable alternative to be assessed. • Should appraise alternative housing/employment growth levels and all potential directions for growth around settlements/Harlow. • Confine all developments to the towns to protect rural ambience. • SA shows that it should not be assumed development should occur in towns at all. Towns should be looked at individually to see where development can be allowed • Development outside towns should be determined by suitable site availability and the need to avoid coalescence with regard to transport and utility provision • Development should be concentrated on smaller villages rather than towns to regenerate populations/services etc. Concentrating development in just the towns would have a detrimental impact on small villages • Stevenage should be classed as a town for the purposes of development strategy options and included in Options A-D • Approach when assessing negative impacts – biodiversity, air quality, flood risk and historic environment - is not consistent throughout. Dispersed options are not considered fully enough in terms of potential wider impacts, viewed collectively • Villages close to larger settlements should be considered as reasonable alternatives for housing and employment development as they are more likely to have access to public transport networks and options such as car-sharing etc • Local food production should be considered as a way of increasing sustainability of local economy and should drive council's approach to development by capitalising on local food initiatives
Most sustainable development location	<ul style="list-style-type: none"> • Adjacent to towns and on brownfield sites • People will still obtain jobs that require travel. By limiting expansion in few areas the effects of increasing vehicle movements could be minimised by targeted investment in public transport. Distributing development wider makes this more difficult. • Option C provided affordable housing is provided for local people near to their support structure – although SA over-simplifies with no negative scores • Development Strategy Option C has least negative effects • East of WGC – a sensitive, thoughtfully master-planned urban extension would not have the impacts stated, dispute disproportionate negative impacts on the areas' few historic features • too much emphasis on the negative effects of Option E
Lacking evidence	<ul style="list-style-type: none"> • Where is the evidence of current positions, housing stock, population, transportation plans, approved applications etc. • No reference to local aspects of the development plan, Hertfordshire LTP and

Q1 - Summary Comment	Q1 - Detailed Comment
	<p data-bbox="453 264 523 291">UTPs</p> <ul style="list-style-type: none"> <li data-bbox="453 300 1310 358">• Assessments and conclusions should be sourced to evidence base or to consultant's views as appropriate. <li data-bbox="453 367 1034 394">• Deficient on evidence of the historic environment <li data-bbox="453 403 1385 461">• Statements like 11.3.13 should be omitted unless justified by tabular/numerical evidence – impact on rural economy

Question 2: Habitats Regulations Assessment

Do you have any comments on the Core Strategy Habitats Regulations Assessment?

24 people/organisations provided comments in relation to Question 2. These included:

- 9 Individuals
- 1 Developer/landowner/agent/business
- 9 Stakeholders/organisations including:
 - Buntingford Civic Society
 - Environment Agency
 - Epping Forest District Council
 - Hertfordshire Biological Records Centre
 - Natural England
 - Rivers Nursery Site & Orchard Group
 - RSPB
 - The Woodland Trust
 - Transition Hertford
- 5 Town and Parish Councils including:
 - Aston
 - Braughing
 - Hertford Town
 - Thorley
 - Walkern

Q2 - Summary Comment	Q2 - Detailed Comment
General support	<ul style="list-style-type: none"> • Appropriate scope and detail • Natural England agrees with conclusions – need to remove reference to EEP
General objection	<ul style="list-style-type: none"> • Found very difficult to understand and in turn, respond to. • Approach taken is inadequate. Refer to Respondent 68 comments to Question 1 • HRA does not offer any mitigation • The whole district is not covered / too much focus on area south of A1170 • Alternative prediction supplied – 475 dwellings per year. • Not enough information or clarity in the Core Strategy to allow conclusions to be reached • Query whether consultation was undertaken with stakeholders rather than visitors
Ecology and habitats	<ul style="list-style-type: none"> • Must support work of HMWT to ensure biodiversity is maintained and enhanced, that population of EH have access to natural world and is encouraged to actively participate in its enjoyment and care for it • Need to identify areas or sites for the restoration and creation of habitats. • New developments should provide accompanying open spaces with a variety of habitats and should protect and enhance existing sites, including on site hedgerows and trees. • Native hedgerows and mature trees are lost through development site clearance to maximise developable site area • There should be an onus on developers to prove that developments cause no significant harm.
Impacts on European Sites and Species	<ul style="list-style-type: none"> • If more local sites were raised to SAC (or similar) standard this would reduce car journeys and ease visitor pressure on existing vulnerable sites. • European Protected Species and Habitats Directives sites such as Lee Valley SPA and RAMSAR site and Epping Forest SAC are particularly vulnerable to effects from development including harm to air quality through increased vehicle movements and the effects of eutrophic of water quality. • Need careful consideration of demand management policies and the impacts of the different development strategies to prevent further harm from development • Need to refer to the protection of European Protected Species under the Habitats Regulations
Protection of Local Sites	<ul style="list-style-type: none"> • Sites of local and wildlife importance should be given more representation and protection. Including Hertford Green Fingers for example and traditional orchards
Monitoring	<ul style="list-style-type: none"> • Monitoring and management of sites is needed including schemes to encourage local stewardship. • Surveys need to be undertaken at the correct time of year to ensure full representation of species presence and behaviour.
Reinstatement of contaminated land	<ul style="list-style-type: none"> • Waste and all other developments should be designed to protect and enhance local biodiversity, including through cleaning and reinstating contaminated sites. Need to restore where countryside has been damaged in the past. • Once neighbouring authority proposals are confirmed we will need to assess these cumulatively.
Waste sites	<ul style="list-style-type: none"> • Disagree with energy from waste – new technology for waste plants mean they cannot harm local air supplies. Over a wider area they improve air quality as they reduce miles travelled by waste containing vehicles and reduce landfill emissions. • Waste developments should be designed to protect and enhance local biodiversity – refer to Habitats Directive
Climate change	<ul style="list-style-type: none"> • CC adaptation must be given a higher prominence in policy as CC mitigation can only go so far in preventing impacts • Effects of CC are showing in natural world – changing plant leafing/growth periods and resultant impacts on migratory birds and woodland species – flora and fauna
Need to manage water quality	<ul style="list-style-type: none"> • New water/sewage infrastructure needs to be built prior to development to protect vulnerable water courses from the effects of pollutant build up – damaging ecology – Lee Valley SPA particularly vulnerable • Issues of water scarcity and sewerage treatment capacity will be exacerbated by

Q2 - Summary Comment	Q2 - Detailed Comment
	<p>climate change in addition to development rates</p> <ul style="list-style-type: none"> • Water Framework Directive now includes stricter water quality targets that need to be complied with.
Need to manage water resources / habitats	<ul style="list-style-type: none"> • All development options will increase pressure on water resources. Reduction in river flows cause significant harm to ecology of wetland environments, particularly downstream of extraction site. • Insufficient water supplies to support 8,500 dwellings – especially with climate change forecast • Impact of North of Harlow on water availability and quality at Lea Valley RAMSAR
Water consumption	<ul style="list-style-type: none"> • Need to be more specific as to how we will reduce water consumption including sources of evidence • Failure of water abstraction policies and programmes not being rectified by providers and regulators
Woodland habitats	<ul style="list-style-type: none"> • Climate change and increasing tourism/disturbance harming woodlands. Prime areas need to be protected through woodland creation projects to increase core areas and make them more sustainable. • Refer to Space for Nature (Woodland Trust) • Disconnected nature of woodland areas harming their potential to adapt. Being 'locked-in' by hostile surroundings causing changes to the species variety of semi-natural habitats and loss of ancient woodland • LDF should explore the potential to encourage buffering of agricultural land and woodland edges as a means of agricultural diversification and habitat buffering – Defra's Entry Level Scheme Guide Book.
Existing over-development	<ul style="list-style-type: none"> • Any further development will only exacerbate existing issues, creating an environment that is unsustainable.

Comments received to Q2 in respect of other Chapters

Chapter 2: Background and Context

Q2 - Summary Comment	Q2 - Detailed Comment
Theme 1	<ul style="list-style-type: none">• For renewables, the biggest impact is changes in electrical distribution routes, not just the new generation installation

Chapter 3: Development Strategy

Q2 - Summary Comment	Q2 - Detailed Comment
East of England Plan	<ul style="list-style-type: none">• Housing numbers and scope of HRA need to be revisited (post revocation of EEP) and consider local housing lists and local predictions of housing need