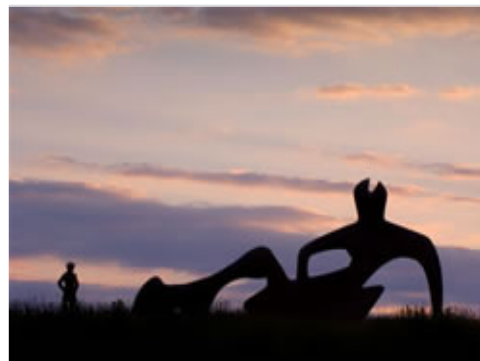


East Hertfordshire District Council Core Strategy Issues and Options **Sustainability Appraisal Report**

Final Report
April 2010



Prepared for

Revision Schedule

Core Strategy Issues and Options Sustainability Appraisal Report March 2010

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1 Introduction

1.1 This report

- 1.1.1 Scott Wilson has been commissioned by East Herts District Council ('the Council') to carry out the Sustainability Appraisal (SA) of the East Herts Core Strategy Issues and Options. The Core Strategy forms part of the East Hertfordshire Local Development Framework (LDF).
- 1.1.2 SA involves identifying and evaluating the impacts of a plan on the economy, the community and the environment – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan as well as ways of maximising its positive impacts. SA is a statutory requirement for Core Strategies and other Development Plan Documents (DPDs) under the Planning and Compulsory Purchase Act 2004.
- 1.1.3 In order to undertake the appraisal of the Core Strategy and other DPDs, it is first necessary to establish a methodology or framework for undertaking the appraisal as well as an evidence base to inform the identification and evaluation of impacts. The framework and evidence base are documented in a Scoping Report published in February 2010.
- 1.1.4 It should be noted that the SA incorporates a Strategic Environmental Assessment (SEA) as required under EU legislation¹.

1.2 East Herts Core Strategy

- 1.2.1 The Council have commenced work on their LDF Core Strategy and have now prepared Issues and Options for consultation. This report documents the SA of the Core Strategy Issues and Options.

1.3 Report structure

- 1.3.1 The report is structured as follows:
- Chapter 2 sets out the adopted approach and methodology for undertaking this SA
 - Chapter 3 introduces the Core Strategy Issues and Options document
 - Chapter 4 summarises the key components from the SA Scoping Report
 - Chapter 5 appraises the compatibility of the SA framework with the strategic objectives in the Issues and Options
 - Chapter 6 appraises the six strategic growth options for development in East Herts
 - Chapters 7 – 13 appraise the options for growth around particular parts of the District
 - Chapter 14 provides a commentary on equality and diversity
 - Chapter 15 consists of a conclusion and sets out what happens next in the plan-making process

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and Programmes on the environment (the 'SEA Directive') implemented through The Environmental Assessment of Plans and Programmes Regulations 2004

2 Approach to SA and Methodology

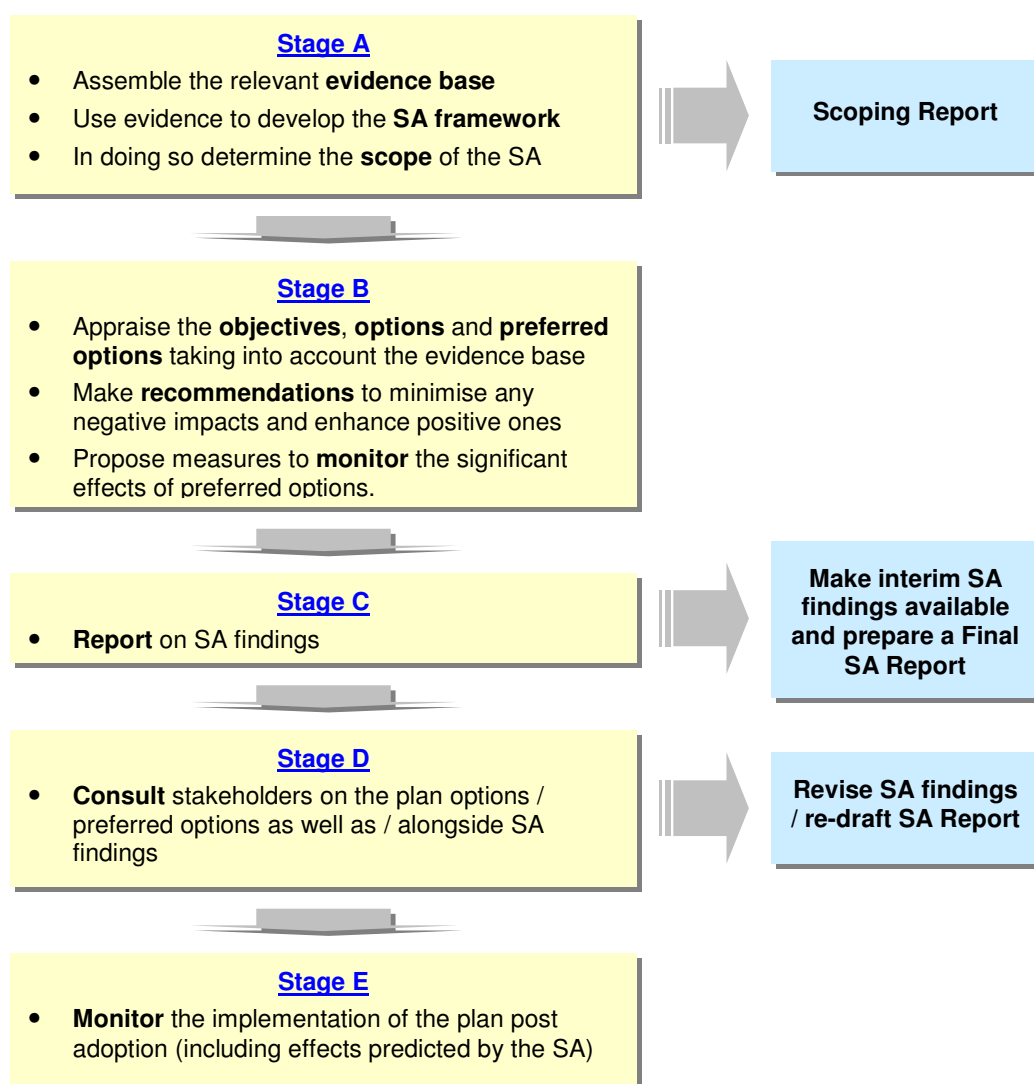
2.1 Introduction

- 2.1.1 This chapter sets out the adopted approach and methodology for undertaking SA of the East Herts Issues and Options.

2.2 SA process

- 2.2.1 SA is based on a five-stage approach as illustrated in Figure 1. At the Issues and Options stage, SA serves to identify the key sustainability implications of the potential decisions that are contained within the document. This provides the local authority with additional evidence to take into account in further developing their Core Strategy.

Figure 1: Five stage approach to SA



Stage A – Framework and evidence base

- 2.2.2 Stage A in the SA process involves developing the framework for undertaking the appraisal – in this case the identification of a series of spatial areas and topics on which the appraisal will focus – together with an evidence base to inform the appraisal. The framework and evidence base are presented in a Scoping Report. The evidence base presented in the Scoping Report includes an analysis of the relevant policy context; a description of the current baseline situation; an analysis of how the current situation might evolve in the absence of the plan; and the identification of any problems which the plan may need to address.

Stage B – Appraisal

- 2.2.3 Stage B in the SA process involves undertaking the appraisal itself. This involves identifying and evaluating the impacts of the different options to the plan makers as well as the preferred options / policies which together comprise the plan. The appraisal is organised around the framework developed in the Scoping Report and informed by the evidence base assembled and documented in the Scoping Report. Mitigation measures for alleviating adverse impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation. Mitigation measures are generally in the form of recommendations for changes to the plan in order to improve its sustainability performance. Crucially, the appraisal should be undertaken in parallel with development of the plan and the appraisal findings should be fed into the emerging plan. In practice, this means undertaking several rounds – or iterations – of appraisal at different stages in the plan-making process.

Stage C – Reporting

- 2.2.4 Stage C in the SA process involves documenting the appraisal findings and preparing an SA Report (this incorporates the material required for inclusion in the 'Environmental Report' under the 'SEA Directive'). The full SA Report should be published for consultation alongside the 'pre-submission' version of the DPD in question; however, SA reports focusing on the emerging plan may be published earlier in the plan-making process (e.g. at the 'issues and options' stage).

Stage D – Consultation

- 2.2.5 Stage D in the SA process involves consulting on the 'pre-submission' version of the plan and the accompanying SA Report; however, as stated above, SA reports can be prepared to accompany consultation on earlier versions of the plan.

Stage E – Monitoring

- 2.2.6 Stage E in the SA process involves monitoring the adopted plan including its sustainability impacts; this is done through the LDF Annual Monitoring Report (AMR).

2.3 SA Structure

- 2.3.1 The methodology that has been adopted for undertaking the SA is based on a 'whole plan' approach. This means that instead of appraising the individual components of the plan against a number of sustainability objectives, the effects of the plan as a whole are appraised and evaluated against a range of topics and spatial areas. These topics and spatial areas effectively form the 'SA Framework' against which the plan is systematically appraised.

2.3.2 For each spatial area and topic we asked a series of questions to satisfy the requirements for scoping as set out in the SEA Directive. The answers to the following questions are presented within the previously completed Scoping Report:

- What's the policy context?
- What are the key sustainability objectives that we need to consider?
- What's the situation now (including any identified problems)?
- What will be the situation without the plan²?
- What issues should be a particular focus for the appraisal?

2.3.3 In this report we have asked the following questions to appraise the Issues and Options:

- What will be the situation with the plan?
- How can we mitigate / enhance the effects³?
- How can we best monitor the plan's effects?

2.3.4 The questions posed above correspond to the key requirements of the SEA Directive and clearly demonstrate compliance with the Directive's requirements. This is illustrated in Table 1.

Table 1: SEA Directive requirements

Key questions	Corresponding requirement of the SEA Directive (the 'environmental report' must include...)
What's the policy context?	"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes " (Annex I(a))
What are the key sustainability objectives that we need to consider?	"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I(e))
What's the situation now (including any identified problems)?	<p>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" (Annex 1(b))</p> <p>"the environmental characteristics of areas likely to be significantly affected" (Annex I(c))</p> <p>"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC" [NB problems relating to European sites are addressed through Habitats Regulations Assessment] (Annex I(d))</p>
What will be the situation without the plan?	"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" (Annex I(b))
What will be the situation	"the likely significant effects (1) on the environment, including on

² Note that the situation without the plan equates to the current plan for the District together with other future changes and trends.

³ These are effectively Scott Wilson's recommendations to the Council

with the plan?	<p>issues <u>such as</u> biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors [our emphasis]</p> <p>(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects” (Annex I(f))</p>
How can we mitigate / enhance effects?	<p>“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme” (Annex I(g))</p>
How can we best monitor the plan’s impacts?	<p>“a description of the measures envisaged concerning monitoring...” (Annex I(i))</p>

2.4 SA methodology

2.4.1 The appraisal has been carried out using an SA framework based on topics and spatial areas. East Herts has requested that Scott Wilson prepare baseline information and undertake appraisal for spatial areas that are geographically defined by:

- the functional consistency and logic which underpins the district’s Housing Market Areas (HMAs)⁴ (i.e. the A1(M) corridor, Hertford-Ware Area, and the M11 Stort corridor); and
- functional policy areas which share similar characteristics (i.e. Rural Service Centres, Rural Area and North of Harlow)

2.4.2 The geographical definition of spatial areas is based on conceptions of internal consistency (i.e. what differentiates one spatial area from another) which suggest a particular approach to establishing the baseline and subsequently focusing the appraisal. The goal of this SA is to assess the effects of the district’s emerging LDF so the overarching question that will direct baseline data collection for each spatial area is: *“what are the significant characteristics which distinguish this spatial area from others and may be affected by the emerging LDF?”*

2.4.3 For example, the first three spatial areas are geographically defined by an internal coherence based on house prices, migration and travel to work data. Therefore, our attention in developing the baseline and undertaking the appraisal is drawn to information relating to these characteristics. It is important to note that these spatial areas have been developed solely as a means to add robustness to the SA and in no way do they pre-determine where development within the District may go.

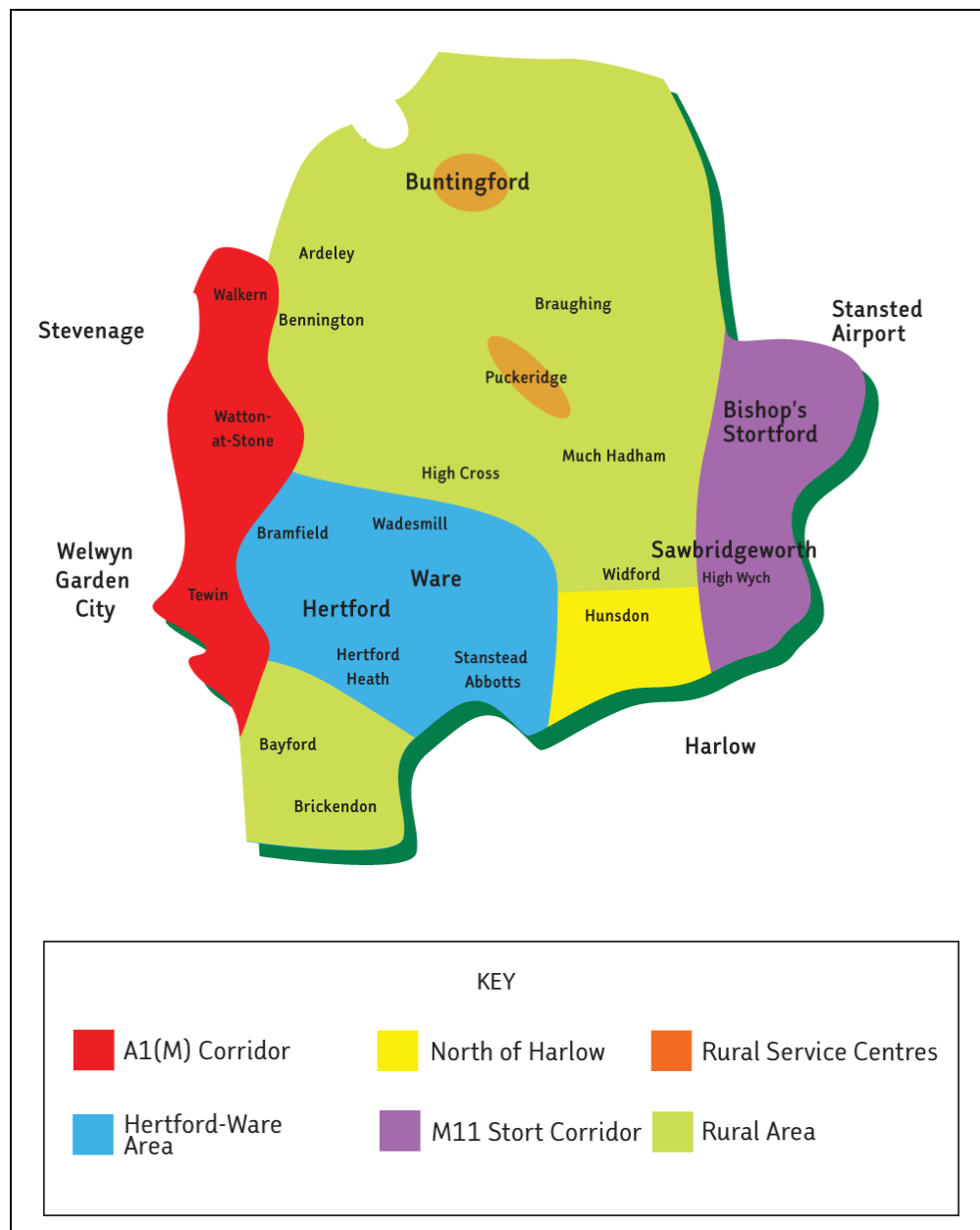
2.4.4 The topics and spatial areas consist of:

- Spatial Areas (see Figure 2)
 - A1(M) Corridor
 - Hertford-Ware Area
 - M11 Stort Corridor

⁴ LCB (East) / M11 Housing Market Partnership (2009). *LCB (East) / M11 Draft Strategic Housing Market Assessment 2009*.

- Rural Service Centres
- Rural Area
- North of Harlow
- Topics
 - Air quality
 - Biodiversity and green infrastructure
 - Climate change (mitigation and adaptation) (includes flood risk)
 - Community and wellbeing
 - Economy and employment
 - Historic environment
 - Housing (includes gypsies and travellers)
 - Land (includes waste)
 - Landscape
 - Transport
 - Water

Figure 2: East Herts SA spatial areas



2.5 Integration of SA with other assessment and proofing exercises

- 2.5.1 The section above outlines our 'whole plan' structure and approach for undertaking SA. This section describes the methodology for the integration of SA with other assessment and proofing exercises (which should, as appropriate, include Equality Impact Assessment (EqIA), Health Impact Assessment and Rural Proofing).

Habitats Regulations Assessment / Appropriate Assessment (HRA/AA)

- 2.5.2 Our methodology for undertaking HRA/AA is consistent with the requirements of the *Planning and Compulsory Purchase Act 2004*, the *European Directive 2001/42/EC* (the “SEA Directive”) and the *Conservation (Natural Habitats, &c) (Amendment) (England and Wales) Regulations 2006* (*Habitats Regulations*). In practice there is little integration between the SA and HRA/AA processes beyond the evidence gathering stage. In the Scoping Report a **European Sites** chapter was included that provides the methodology, evidence base and scope for the HRA/AA. A separate HRA / AA Screening Report will be prepared for the Core Strategy Issues and Options.

Equality Impact Assessment (EqIA), Health Impact Assessment (HIA) and Rural Proofing

- 2.5.3 Methodologies promoted for stand-alone processes of EqIA (see Box 1), HIA (see Box 2) and Rural Proofing tend to be closely comparable to the process set out in government guidance on SA. As a result, these assessment exercises can be relatively easily incorporated into the SA process.
- 2.5.4 The new PPS12 states that: “Where authorities are required by law or encouraged by government policy to undertake assessments of their plans, such assessments should feed into and be summarised in the sustainability appraisal”.
- 2.5.5 Although SA can consider the full range of topics, the premise for integrating topic specific assessment exercises is to ensure that some topics receive the attention and prominence in the appraisal process that they warrant (given the plan context) and are given an appropriate level of consideration.
- 2.5.6 In the Scoping Report, EqIA and HIA have been incorporated within the **Community and Wellbeing** chapter and Rural Proofing has been addressed through the inclusion of a rural spatial area in the SA framework as well as the consideration of rural issues across the different topic areas. The approach to Rural Proofing taken in this document extends from the guidance provided by the former Countryside Agency but has been undertaken in line with SA methodology and as appropriate to the Issues and Options stage of the Core Strategy.

Box 1: Equality Impact Assessment (EqIA)

EqIA aims to anticipate the effects of a plan on different groups within the community (equality target groups). A key driver for EqIA is the Equality Act 2006, which places statutory obligations on public sector organisations to ensure that all equality groups are not discriminated against within public sector service delivery and employment. The forthcoming Single Equality Bill 2009, a new streamlined public sector equality duty, is due to replace existing race, disability and gender equality duties and will be extended to cover all strands of discrimination, including measures to tackle socio-economic disadvantage.

Guidance on EqIA suggests a six-stage process of screening, scoping / defining, information gathering, making a judgement, action planning, and publication and review⁵. This very closely matches the SA process, but focuses on the needs of, and impacts on, specific groups and the differential nature and proportionality of impacts. This very closely matches the SA process, but focuses on the needs of, and impacts on, specific groups and the differential nature and proportionality of impacts.

There are **six** identified **equality target groups**, or **equality strands**, that are central to the equality

⁵ Improvement and Development Agency (2008) *The EqIA process: six-step guide* [online] available at: <http://www.idea.gov.uk/idk/core/page.do?pageId=8017502> (accessed 16 September 2009).

agenda:

- race
- gender
- disability
- sexual orientation
- age
- religion and or belief

We follow the same process for the EqIA as we follow for the SA, i.e. we have prepared a topic paper - Community and wellbeing - that includes equality and diversity for inclusion in the Scoping Report and later ask how the options and preferred options / policies will impact on equality issues. The EqIA component in the topic paper in the Scoping Report is organised around the six equality target groups (and any others identified in discussion with the Council). The Council may decide to involve consultees and groups associated with EqIA in the Scoping Report consultation as well as consultation stages of the planning process.

Box 2: Health Impact Assessment (HIA)

Health Impact Assessment (HIA) is an approach that ensures decision making at all levels considers the potential impacts of decisions on health and health inequalities. It identifies actions that can enhance positive effects and reduce or eliminate negative effects. HIA is a relatively new tool, and although there is no single agreed national approach or methodology, the value of HIA is increasingly being recognised, both nationally and internationally.⁶

Basic sequential steps involved in carrying out HIA can include:

- Screening
- Scoping
- Appraisal of the potential health effects/impacts
- Decision-making
- Monitoring and evaluation

HIA has been successfully integrated into the statutory process of SA and SEA undertaken for regional, sub-regional and local planning policy. In these instances the health input into policies has been strengthened.

2.6 Approach to the SA

- 2.6.1 The appraisal of strategic objectives and spatial options (or alternatives) has been carried out using the SA framework described above. The appraisal itself is a qualitative exercise based on the professional judgement of Scott Wilson and drawing on the available evidence. Checks on the robustness and accuracy of the appraisal have also been provided through review by East Herts District Council.
- 2.6.2 In appraising the Issues and Options an important point to remember is that it is only the likely significant effects of the plan, not all possible effects that need to be appraised. Ultimately, the significance of an effect is a matter of judgement and should require no more than a clear and reasonable justification. Where possible, judgements have been made taking into account the

⁶ London Health Commission (no date). *Health Impact Assessment* [online] available at: <http://www.london.gov.uk/lhc/hia/> (accessed 4 June 2009).

baseline evidence gathered at the scoping stage (as documented in the Scoping Report) as well as any recent evidence where it may be appropriate.

2.6.3 When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects;
- Cumulative nature of effects;
- Magnitude and spatial extent of the effects; and
- Value and vulnerability of area likely to be effected.

Approach to testing the compatibility of strategic objectives

2.6.4 The Government's *Practical Guide to the Strategic Environmental Assessment Directive*⁷ suggests that it may be useful to test the compatibility of the SA objectives (in this case the SA framework provided by the agreed topics, but not the spatial areas) with the strategic objectives of the plan. This will help to refine the Core Strategy objectives. This appraisal will also help to identify and clarify any tensions between the parts of the SA framework and the strategic objectives of the plan so that subsequent decisions are well based, and mitigation or alternatives can be considered.

2.6.5 The approach adopted in this SA to test the compatibility of the strategic objectives is to identify and comment on areas which are compatible, incompatible and areas where there are no links. An example of how this approach has been used for this SA is shown in Table 2.

⁷ ODPM (2005). *A Practical Guide to the Strategic Environmental Assessment Directive* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesea.pdf> (accessed 5 March 2010).

Table 2: Testing compatibility between SA framework topics and Issues and Options strategic objectives (example)

Testing Compatibility				
	Issues & Options Theme 1	Issues & Options Theme 2	Issues & Options Theme 3	Issues & Options Theme <i>n</i>
Topic 1	✓	✓		✗
Topic 2	✗		?	
Topic 3	?	✗	✓	✓
Topic <i>n</i>	✓	✓	✓	✗

Scoring Key			
Compatible ✓	Incompatible ✗	Uncertain ?	No links

Approach to appraising the growth options

- 2.6.6 As will be discussed further in Chapter 3, in addition to strategic objectives for the District, the Issues and Options document also includes a series of growth options covering both the District as a whole as well as for particular parts of East Herts. SA has a key role to play to inform the evaluation of alternatives. It provides a powerful means of showing decision makers, and the public, that the eventual plan is the most appropriate given reasonable alternatives.
- 2.6.7 To help identify and assess the likely effects of the different options a scoring approach has been adopted with a more detailed narrative explaining the rationale behind the identification of significant effects. The likely significant negative effects will then be commented on further to provide additional information on the nature of the impacts. The scoring key that has been used is shown in Table 3. Separate scoring tables have been used to differentiate between the effects of the different options on spatial areas (see Table 4) and topic areas (see Table 5).
- 2.6.8 It has not been necessary to appraise the effects of each growth option against every spatial area within the SA framework. For example, the different growth options for Buntingford are not likely to lead to significant effects on Ware that have not already been addressed through the appraisal of the District-wide strategic growth options.

Table 3: Scoring key

Scoring Key
Significant beneficial effect (+)
No significant effect (0)
Uncertain effect (?)
Positive & negative effects (+ / -)
Significant negative effect (-)

Table 4: Scoring example for spatial areas

Scoring for Spatial Areas					
	Growth Option 1	Growth Option 2	Growth Option 3	Growth Option 4	Growth Option n
A1 (M) Corridor	+	+	0	+	-
Hertford-Ware Area	?	0	+ / -	+	-
M11 Stort Corridor	-	0	-	+	0
Rural Service Centres	0	?	+	+ / -	?
Rural Area	+	+	-	0	+
North of Harlow	-	-	+	-	?

Table 5: Scoring example for topic areas

Scoring for Topic Areas					
	Growth Option 1	Growth Option 2	Growth Option 3	Growth Option 4	Growth Option n
Air quality	-	-	-	+	?
Biodiversity and green infrastructure	+	+	-	+	0
Climate change	0	+ / -	+	+	+
Community and wellbeing	+	?	-	0	0
Economy and employment	0	+	+	?	+
Historic environment	+	-	0	-	+
Housing	-	+ / -	+ / -	+	+
Land	0	0	+	?	0

Landscape	-	+	0	+ / -	0
Transport	+	-	-	-	-
Water	?	+	+	-	0

3 The Core Strategy

- 3.1.1 The statutory spatial development plan for East Herts District Council is called the Local Development Framework (LDF) and is made up of a portfolio of documents, including the Core Strategy Development Plan Document (DPD). The Core Strategy is the principal document in the LDF and sets out the overarching development strategy for East Herts to 2031. Importantly, the Core Strategy sets the policy context for subsequent LDF documents by establishing the principles of development and identifying the broad locations for growth. The Core Strategy will ultimately include only 'high-level' District wide planning policies and is not concerned with detailed policy issues e.g. design and amenity or the allocation of specific sites for development.
- 3.1.2 Preparation of the Core Strategy is a multi-stage and iterative process and follows on from consultation that the Council has already undertaken. The Issues and Options document is not the final document. As the Council refines its plans through subsequent stages of the plan making process there will be further opportunity for community engagement.
- 3.1.3 This SA Report presents findings based on the appraisal of a draft Issues and Options document provided to Scott Wilson on 4 March 2010. This document includes three key elements that have been appraised against the SA framework:
- A series of LDF strategic objectives that will deliver the LDF vision for East Herts;
 - Development strategy options for the distribution of growth across District;
 - A series of options for growth across five different spatial areas plus villages; and
 - An approach to development to the north of Harlow.

Strategic Objectives

- 3.1.4 The key issues facing East Herts have been arranged across nine themes and each theme includes strategic objectives that apply to the LDF as a whole. The nine themes and their associated strategic objectives are:
- **Theme 1: East Herts energy and climate change**
 - **ECC1:** To mitigate climate change by reducing carbon dioxide emissions from new and existing development through an integrated approach to sustainable construction, energy efficiency and energy supply, and by encouraging use of low-emission travel alternatives including passenger transport, walking and cycling.
 - **ECC2:** To enable communities to adapt to climate change through appropriate design measures, including landscaping, drainage, street layout and building design.
 - **Theme 2: East Herts people and community safety**
 - **PCS1:** To develop safe and secure communities by taking into account the need to reduce opportunities for crime and anti-social behaviour and to reduce the fear of crime across the District.
 - **PCS2:** To encourage a rich and diverse community life to enhance cohesion and maintain the thriving and vibrant communities in East Herts.

- **PCS3:** To encourage increased communication and partnership working between town, parish, District and county councils, and community and voluntary groups, to enable community involvement in the design, development and management of places.
- **PCS4:** To ensure that services can withstand pressure from increased population numbers and take measures to maintain a mixed age population, enabling young people to stay in the District and catering for the growing elderly population, to ensure a balanced community.
- **PCS5:** To protect existing facilities and provide high quality community based services to serve all levels of dependency, in an effort to reduce social inequalities and disadvantage and to address the needs of all groups in East Herts.
- **Theme 3: Housing East Herts**
 - **HOU1:** To ensure flexibility of housing through minimum quality, accessibility, space, and private outdoor amenity standards.
 - **HOU2:** To ensure that the East of England Plan target of at least 600 additional dwellings per annum are delivered on suitable sites in sustainable locations that provide for a choice of housing types, sizes and tenures.
 - **HOU3:** To provide sufficient accommodation in sustainable locations for Gypsies & Travellers and Travelling Showpeople on sites which enable successful co-existence with settled communities and offer opportunities for social integration.
 - **HOU4:** To ensure that the specialist accommodation needs of vulnerable individuals and groups including older people are met.
 - **HOU5:** To achieve sustainable mixed communities by ensuring the delivery of sufficient affordable housing, either social rented or intermediate housing.
- **Theme 4: East Herts character**
 - **CHA1:** The whole rural area of East Herts functions as an important 'green bubble' and its openness should be maintained through the prevention of urban sprawl and inappropriate development and land use through the appropriate management of the Green Belt.
 - **CHA2:** To accept that all landscapes are influenced by human action and that they have changed and will continue to change over time. Manage this change in a sustainable manner by understanding and applying the key landscape features of each landscape character area to new development in a proactive way that does not destroy the intrinsic value of that unique landscape.
 - **CHA3:** To ensure that all new development is well designed and reflects its local vernacular context utilising local materials and/or building styles to maintain a unique sense of place.
 - **CHA4:** To preserve and enhance the special historic character of East Herts listed buildings and conservation areas.
- **Theme 5: East Herts economy, skills and prosperity**

- **ESP1:** To attract investment and balance new housing with the creation of high-value jobs by delivering appropriate business infrastructure and employment sites for a range of business types and needs.
- **ESP2:** To support a viable rural economy in the villages and on the land by enabling diversification whilst preserving the special character of the rural area.
- **ESP3:** To promote the vitality and viability of the District's town centres by defining a clear and distinctive role for each one, encouraging an appropriate mix of shops, and a high quality urban environment which will appeal to residents and visitors alike.
- **ESP4:** To support educational needs by encouraging the provision of new facilities and infrastructure in appropriate locations.
- **ESP5:** To encourage visitors to our towns and villages by promoting East Herts and its culture supported by the provision of appropriate tourist facilities.
- **Theme 6: East Herts on the move**
 - **OTM1:** To assist in enabling people's travel needs to be met in order that safe access to the services and amenities offered in local towns, villages, the countryside and wider destinations can be achieved by all.
 - **OTM2:** To locate development where it will minimise the need to travel to key services and facilities such as employment, education, healthcare, retail and recreation.
 - **OTM3:** To assist in engendering modal shift from private motorised transport to sustainable integrated travel options to help relieve congestion, address car parking issues, reduce the District's carbon footprint and improve the quality of life for all.
 - **OTM4:** To help facilitate the delivery of passenger transport services that meet the travel needs of residents and employees in the District in a manner which addresses current shortfalls in provision and allows capacity to accommodate future growth.
 - **OTM5:** To support the retention and enhancement of existing walking and cycling routes and facilities and seek additional safe and attractive provision to make these means of travel more appealing to users and thereby increase modal share.
 - **OTM6:** To seek to mitigate the negative effects of aviation development and operation.
- **Theme 7: East Herts health, wellbeing and play**
 - **HWP1:** To maintain and improve existing arts, culture and entertainment facilities and to encourage the provision of new facilities in appropriate locations.
 - **HWP2:** To support the diversity of faith communities and places of worship by protecting existing facilities and encouraging the provision of new facilities in appropriate locations.
 - **HWP3:** To protect and support existing community facilities and encourage the provision of accessible new facilities which address the specific needs of the community.
 - **HWP4:** To support the provision of good quality, accessible, health facilities to meet the needs of the community.

- **HWP5:** To support healthy communities by protecting and enhancing existing sport, recreation and open space facilities and providing accessible opportunities for new facilities including encouraging new water-based recreational opportunities in appropriate locations.
- **Theme 8: Green East Herts**
 - **GRE1:** To protect and enhance the quality of the environment by mitigating the impacts of air, water, land, light, and noise pollution through measures including the sustainable reduction and management of waste and the promotion of recycling.
 - **GRE2:** To identify and promote networks of green infrastructure as a haven for wildlife as well as a recreational amenity.
 - **GRE3:** To protect water supplies and water quality from the impacts of new development.
 - **GRE4:** To mitigate flood risk by avoiding development in areas at risk of flooding and encouraging sustainable drainage.
- **Theme 9: East Herts monitoring and delivery**
 - **MAD1:** To ensure the timely delivery of infrastructure to support new growth and development.
 - **MAD2:** To provide a framework for continuous monitoring together with procedures and guidance to enable risk to be managed in the best way, and to provide sufficient flexibility to cope with changing circumstances and uncertainty.
 - **MAD3:** To deliver sustainable development and ensure that social and environmental benefits are achieved through proper use of developer contributions.
 - **MAD4:** To produce and keep up to date an effective Local Development Framework based on an analysis of robust evidence to deliver the LDF vision and objectives and achieve sustainable development.

Development Strategy options for the distribution of growth across District

3.1.5 East Herts has generated six distinct development strategy options that would be able to deliver the LDF vision and objectives of the Core Strategy and accommodate the required growth in the most sustainable locations⁸. The six options that will be appraised are:

- Option A: Towns
- Option B: Towns and Larger Service Villages
- Option C: Towns, Larger Service Villages, and Smaller Service Villages
- Option D: Towns, Larger Service Villages, Smaller Service Villages, and Other Villages / Hamlets
- Option E: Towns, Stevenage and Welwyn Garden City
- Option F: Settlements within Transport Corridors.

⁸ It is important to note that these development strategy options do not deal with the growth to the north of Harlow as it is dealt with separately in Chapter 10 of the Issues and Options.

3.1.6 Whichever development strategy option is chosen, the Council will still need to distribute the required number of houses between the identified settlements. Whilst recognising that more work is required on this, the Council has set out six approaches to housing distribution. These have also been appraised, building on the analysis of the Development Strategy Options. The six approaches are:

- Approach I: Proportional distribution
- Approach II: Adjusted proportional distribution
- Approach III: Reversed proportional distribution
- Approach IV: Equal distribution
- Approach V: Distribution by land availability
- Approach VI: Distribution by settlement type.

Future Development Options

3.1.7 East Herts has also generated future development options and emerging visions for the five main settlements, together with the villages and north of Harlow. These are:

- Bishop's Stortford
- Buntingford
- Hertford
- Sawbridgeworth
- Ware
- Villages
- North of Harlow.

4 Summary of the Scoping Report

4.1 Introduction

4.1.1 The Scoping Report outlines in detail the spatial areas and topics of the sustainability framework and serves as an important reference document for the Sustainability Appraisal. This chapter summarises and signposts the content of this document:

- What's the policy context?
- What's the situation now?
- What's the situation without the plan?
- What issues should be a particular focus for the appraisal?

4.2 What's the policy context?

4.2.1 One of the key requirements of the SEA Directive is to give *"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"*. This information should help the Plan take into account and reflect the policies, obligations and issues that affect the Plan's area of influence. The policy context is set out in detail in the Scoping Report⁹ and includes a range of European, national, regional and local PPPSIs (Plans, Programmes, Policies, Strategies, Initiatives).

4.2.2 One of the most important documents that the East Herts LDF should take in to account is the Regional Spatial Strategy (RSS). The East of England Plan¹⁰ provides the overall planning framework for the region and LDFs must be in conformity with the broad planning policies and growth requirements that it sets out. The RSS sets out policies under a number of key areas and those that specifically refer to East Herts are briefly outlined below.

4.2.3 The general spatial approach taken by the Plan is to concentrate development in urban areas to reflect the polycentric nature of the East of England. Under the Plan's spatial strategy policies a number of Key Centres for Development and Change (KCDCs) are identified where new development should be concentrated in order to support this ambition. Although none of these are within East Herts, nearby KCDCs (the impacts of which must be considered by the LDF) include Harlow, Stevenage, Hatfield and Welwyn Garden City. The strategy for Stevenage is to develop Stevenage as a regional employment and housing growth point. This includes overall housing growth of 16,000 dwellings within and on the edge of the built up area by 2021 including sustainable urban extensions to the west of Stevenage. Welwyn Garden City and Hatfield are a joint KCDC within the London Arc with overall housing growth of 10,000 by 2021 focused mainly at these towns and identification of urban extensions. Reconciling growth within the capacity constraints and pressures of the A1 (M), A414 and the East Coast Main Line is a key challenge for this KCDC that will also be of relevance to East Herts.

4.2.4 Harlow KCDC includes the development of 16,000 dwellings at Harlow to 2021 including urban extensions in East Herts and Epping Forest. This figure will split between the three Districts as determined through DPDs and has been subject to a separate Harlow Area Options appraisal.

⁹ See: <http://www.eastherts.gov.uk/index.jsp?articleid=12345>

¹⁰ GOEE (2008) *East of England Plan* [online] available at: http://www.gos.gov.uk/goee/docs/Planning/Regional_Plan1.pdf (accessed 9 March 2010).

Excluding urban extensions to Harlow, the Plan's housing policies include a minimum indicative target for East Herts to provide 12,000 net additional dwellings over the period 2001 to 2021. A Single Issue Review to the Plan¹¹ states that East Herts needs to provide a minimum of 25 additional gypsies and travellers pitches between 2006 and 2011. One of the spatial strategy policies identifies that strategic reviews of green belts are needed in several areas to meet regional development needs at the most sustainable locations. This includes Harlow, involving land in East Herts and this review *"should identify compensating strategic extensions to the Green Belt in East Herts..."*

4.2.5 The Plan includes a series of policies regarding economic development. These include an indicative target of 68,000 net job growth for Hertfordshire as a whole 2001-2021. Provision of strategic employment sites may be required in East Herts at locations which would support clusters / sectors or the regeneration of the Lee Valley. From an economic perspective, other potential effects of RSS policies that East Herts will need to consider include the identification of Harlow as a KCDC and as a major town centre and the growth of Stansted Airport. DPDs for East Herts should reflect the sustainability benefits of a growing number of airport employees living at towns close to the Airport. Housing development related to employment growth at the Airport, and employment development not directly related to Stansted Airport's operation, should be located at Harlow and nearby towns. The Plan notes that the Stansted Airport Access Improvements from M11 and A120 scheme is currently programmed for funding through developer contributions.

4.2.6 The East Herts Sustainable Community Strategy¹² is the overarching framework for all key services in the District covering the period 2009 to 2024. This document sets out the Local Strategic Partnership's vision for the District which is to:

Create a thriving, fair, and inclusive East Herts that safeguards and enhances our unique mix of rural and urban communities, where people choose to live, work and visit because:

- *it is safe, clean, green and well connected;*
- *everyone matters and can take part in decisions that affect their lives; and*
- *there are sustainable economic and social opportunities that improve quality of life and are available to all.*

4.3 What's the situation now?

4.3.1 The situation now is set out in the Scoping Report which provides the current baseline for each of the spatial areas and topics of the SA framework. This document may be accessed on the East Herts website.¹³

4.4 What's the situation without the plan?

4.4.1 The situation without the plan is set out in the Scoping Report for each of the spatial areas and topics of the SA framework. This document may be accessed on the East Herts website.¹⁴

¹¹ GOEE (2009) *Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England* [online] available at: http://www.gos.gov.uk/goeast/planning/regional_planning/687221/?a=42496 (accessed 23 February 2010).

¹² East Herts District Council (2009) *Everyone Matters: A Sustainable Community Strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/b/g/scs_document_2009_web_edit.pdf (accessed 26 March 2010).

¹³ See: <http://www.eastherts.gov.uk/index.jsp?articleid=12345>

4.5 What issues should be a particular focus for the appraisal?

4.5.1 Table 6 provides a consolidation of what issues should be a particular focus for the appraisal as identified in the Scoping Report. These issues will provide prompts throughout the appraisal in order to determine impacts on the SA framework as we consider the Issues and Options.

Table 6: Issues for particular focus in the appraisal

Spatial area / topic	Key sustainability issues
A1(M) Corridor	<ul style="list-style-type: none"> Increasing more sustainable modes of transport Improving access to housing and services Housing affordability
Hertford-Ware Area	<ul style="list-style-type: none"> Increasing more sustainable modes of transport Improving access to housing and services Housing affordability
M11 Stort Corridor	<ul style="list-style-type: none"> Increasing more sustainable modes of transport The need to address deficiencies in access to public open space near North Harlow and Sawbridgeworth through environmental enhancements Ensuring the environmental integrity of the Stort Valley is maintained and wildlife protected while maximising its potential as part of the wider green infrastructure network Achieving a sustainable urban extension to Bishop's Stortford to the north of the town Ensure that the future development of Stansted Airport is reflected in development plans Housing affordability
Rural Service Centres	<ul style="list-style-type: none"> The need to manage the impacts of growth (particularly traffic) within the RSCs and their surrounding environs The maintenance and possible improvement of sustainable modes of transport Maintenance and viability of local facilities and services Maintenance and enhancement of the local distinctiveness and character of the individual villages
Rural Area	<ul style="list-style-type: none"> The need to ensure that new development enhances the quality of life in rural areas The need to support economic diversification Housing affordability Access to key facilities and services The need to manage the impacts of rising traffic levels Protection of rural landscape elements and character.
North of Harlow	<p>In light of the information above, key issues to take into account in the appraisal in relation to Harlow North primarily relate to the strategic objectives included with Policy HA1 of the East of England Plan. These include:</p> <ul style="list-style-type: none"> The enhancement and conservation of green infrastructure including the creation and maintenance of multi-functional greenspaces which should: <ul style="list-style-type: none"> Maintain the principle of 'green wedges' penetrating the urban fabric of the town and urban extensions; Provide for enhanced recreational facilities; Protect and maintain designated wildlife sites and provide for biodiversity; Provide flood storage areas due to the flashy nature of the River Stort and the presence of flood zones within the wider north of Harlow area; and

¹⁴ Ibid.

Spatial area / topic	Key sustainability issues
	<ul style="list-style-type: none"> ○ Contribute to a visually enhanced character and setting to the town • Achieve a major increase in the use of public transport, walking and cycling • The need to ensure that impacts on the local and nearby strategic transport infrastructure are minimised. <p>Other key issues to take into account in the appraisal in relation to Harlow North include:</p> <ul style="list-style-type: none"> • The need to give early consideration to landscape and biodiversity enhancement and woodland management • The need to ensure that Harlow North provides access to adequate employment opportunities, a range of community facilities and links to other centres and key services • Protecting high quality agricultural land • Housing affordability • The need to give consideration to the inevitable green belt incursion in terms of green belt principles/purposes and wider green belt connectivity • Where possible there is a need to protect important historic environment assets and key aspects of historic environment character
Air quality	<ul style="list-style-type: none"> • The need to improve air quality in AQMAs and other areas exceeding air quality objective levels • The need to ensure that inappropriate levels of development or activities which contribute towards lower levels of air quality are not located within inappropriate proximity to where air quality objectives have been exceeded or are approaching objective limits • The need to ensure that future development does not lead to residents likely to be in an AQMA or subject to levels near to the air quality objective levels
Biodiversity and green infrastructure	<ul style="list-style-type: none"> • The need to ensure that development does not negatively impact upon designated nature conservation sites including key biodiversity areas, habitats and species (informed by the Hertfordshire BAP) and other recognised sites of nature conservation importance, including Wildlife Sites • The need to protect and enhance sites of importance for wildlife; both statutory and non-statutory • In areas of substantial development (e.g. north of Harlow) there is careful consideration for the incorporation of green infrastructure features • Consideration is given to multi-functional green spaces which transcend the administrative boundaries of East Herts.
Climate change (mitigation and adaptation)	<ul style="list-style-type: none"> • The need to lower GHG emissions • The need to increase the amount of energy generated by decentralised or renewable sources • The impact of development on surface water flooding • Development within the areas at risk of flooding • The need to promote water efficiency as well as energy efficiency due to the anticipated increased water demand from people and the environment • The need to take the findings of the SFRA into account in preparing policies and allocating sites for development.
Community and wellbeing	<ul style="list-style-type: none"> • The need to ensure that the equality, health and social care needs of a growing and ageing population are met • The need to ensure that opportunities to capitalise on the benefits which may emerge through the expansion of Stansted Airport • The need to ensure that the needs of the disabled population in the District are met • The need to reduce inequalities experienced in female life expectancy • The need to ensure that the high levels of VCS activity continues • The need to consider and minimise the impacts of air quality on health

Spatial area / topic	Key sustainability issues
Economy and employment	<ul style="list-style-type: none"> The need to ensure that jobs are created in an appropriate manner and scale across all parts of the District The need to ensure that opportunities to capitalise on the benefits which may emerge through the expansion of Stansted Airport The need to ensure that job creation is matched by the provision of appropriate facilities and infrastructure The need to ensure that policies will help to encourage greater rates of GVA growth.
Historic environment	<ul style="list-style-type: none"> The need to protect the District's historic environmental assets (both designated and non-designated) from inappropriate development The need to appreciate and capitalise on the potential that historic assets have to contribute towards place-shaping through their distinctive character and inspiration for design of further development The need to be aware of the potential for unknown historic sites as a potential material constraint on development
Housing	<ul style="list-style-type: none"> To increase the provision of affordable housing To ensure that the appropriate levels of new dwellings are provided over the plan period To ensure that national PDL targets are met To ensure that the housing needs of an ageing and disabled population are met The need to provide additional Gypsy and Traveller pitches, and to ensure that new site pitches are located with adequate access to services in line with the East of England Plan
Land	<ul style="list-style-type: none"> Ensure that development does not contaminate the major aquifer beneath East Herts The need to identify, avoid and if appropriate remediate contaminated land in the District To increase recycling rates which are poor compared to the County average The need to ensure that waste is minimised at the design stage of a development
Landscape	<ul style="list-style-type: none"> The need to protect the District's landscape assets from inappropriate development Where development proceeds, particularly in greenfield areas, there is a need to ensure that landscape assets, such as hedgerows, are protected and integrated to maximise their potential amenity value
Transport	<ul style="list-style-type: none"> The need to ensure that a more sustainable modal shift is facilitated and that levels of private car use for commuting is reduced The need to ensure that new development does not contribute towards increased levels of traffic congestion The need to ensure that rural accessibility to bus services does not deteriorate and is improved.
Water	<ul style="list-style-type: none"> East Herts is located in an area experiencing water scarcity which is predicted to be exacerbated due to climate change and future growth and development The need to ensure the distribution and location of development takes the water supply and sewerage infrastructure into account The need to reduce per capita consumption of water.

5 Compatibility of the SA Framework and Issues and Options Strategic Objectives

Introduction

- 5.1.1 This section tests the compatibility of the Core Strategy Issues and Options strategic objectives against the spatial areas and topics key sustainability objectives (the SA framework).
- 5.1.2 The strategic objectives are intended to help achieve the LDF vision. The 40 objectives are designed to address the issues identified under the nine key themes (these have been outlined in Chapter 3).
- 5.1.3 It is important for the objectives of the Core Strategy to be in accordance with sustainability principles. The Government's *Practical Guide to the Strategic Environmental Assessment Directive*¹⁵ suggests that it can be useful to test the compatibility of the SA objectives (in this case the SA framework provided by the agreed topics, but not the spatial areas) with the strategic objectives of the plan. This will help to refine the Core Strategy objectives. This appraisal will also help to identify and clarify any tensions between the parts of the SA framework and the strategic objectives of the plan so that subsequent decisions are well based, and mitigation or alternatives can be considered.

Compatibility test

- 5.1.4 CLG Guidance¹⁶ suggests using a matrix to compare the plan objectives with the SA objectives. The Core Strategy sets out 40 strategic objectives; the complete text for which can be found in Chapter 3. Compatibility is considered by comparing the sustainability objectives (and the key issues identified in the Scoping Report) against the Core Strategy strategic objectives as grouped under their nine themes. This is illustrated in Table 7 and discussed below.

¹⁵ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesae.pdf> (accessed 5 March 2010).

¹⁶ CLG (no date) *Plan making manual: refining options and assessing effects* [online] available at: <http://www.pas.gov.uk/pas/core/page.do?pageId=156210> (accessed 23 February 2010).

Table 7: Testing compatibility between SA framework and Issues and Options strategic objectives

Testing Compatibility									
	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
Air quality	✓		?/✓		✗	✓	✓	✓	✓
Biodiversity and green infrastructure	✓	?	?/✓	✓	✗	?	✓	✓	✓
Climate change (mitigation and adaptation) (includes flood risk)	✓	✓	?/✓	✓	✗	✓	✓	✓	✓
Community and wellbeing	✓	✓	✓		✓	✓	✓	✓	✓
Economy and employment		✓	✓		✓	✓	✓		✓
Historic environment			?/✓	✓	?	?	?		✓
Housing (includes gypsies and travellers)	✓	✓	✓		✓	✓		✓	✓
Land (includes waste)	✓	✓	✗	✓	?	?	?/✓	✓	✓
Landscape	✓	✓	✗	✓	?	?	?	✓	✓
Transport	✓	?	✓		?	✓	✓		✓
Water	✓	?	✗	✓	✗			✓	✓

Discussion

- 5.1.5 The thematic strategic objective categories are generally compatible with the sustainability framework, however, some incompatibilities and uncertainties were identified. These are discussed below. There is no requirement on behalf of the Council to make changes to these objectives however, where there is a conflict between objectives, the Council will need to reach a decision on priorities.
- 5.1.6 The 'People and Community Safety' theme could be compatible with biodiversity and green infrastructure but the relationship between these two areas has not been drawn out.
- 5.1.7 Under the 'Housing' theme, uncertainty reflects an assumption that definitions of 'suitable sites' and 'sustainable communities' include consideration for environmental and historic features, promoting sustainable transport, flood risk, sewage infrastructure and prioritising the development of PDL land where possible. However, it is likely that there will be negative effects against the land and landscape topics due to the requirement for greenfield landtake and against water due to the sensitivity of regional resources.
- 5.1.8 The theme for 'Economy, Skills and Prosperity' may be incompatible with air quality, biodiversity and green infrastructure, climate change, and water objectives. This is due to the increased transport and construction emissions, as well as higher rates of water consumption which would arise through economic growth, particularly in the short to medium term. Uncertainties related to this theme reflect the potential for negative effects against certain objectives which can be mitigated through appropriate spatial and thematic safeguarding policies.
- 5.1.9 The strategic objectives comprising Theme 6 – East Herts on the Move, are largely compatible or have no clear links with the SA framework topics. Some uncertainties have been observed in relation to Biodiversity and Green infrastructure, Historic environment, Land, Landscape and Transport in light of the perceived challenges associated with facilitating a step change towards more sustainable transport patterns. For example, development within the District is likely to lead to greater transport emissions in the short to medium term of the plan which could lead to greater harm to biodiversity. Additionally, higher levels of transport and the supportive infrastructure required by growth may negatively affect the landscape character of this largely rural District.
- 5.1.10 Uncertainties regarding compatibility under the 'Health Wellbeing and Play' theme relate to general observations over the potential impact of new facilities on the historic environment and potential changes to the area's landscape character both directly through land use change and indirectly through increased vehicle traffic as individuals access open spaces. This includes the enhanced use of water-based recreation opportunities on the River Stort and Lee Valley and the potential negative effects this may have on the character of these areas.

6 Appraisal of Development Strategy Options

6.1 Introduction

6.1.1 East Herts has generated six distinct development strategy options that would be able to deliver the LDF vision and objectives of the Core Strategy and accommodate the required growth in the most sustainable locations¹⁷. This section appraises the six development strategy options against the SA spatial areas and topics (the SA framework). The six options that are appraised are:

- Option A: Towns
- Option B: Towns and Larger Service Villages
- Option C: Towns, Larger Service Villages, and Smaller Service Villages
- Option D: Towns, Larger Service Villages, Smaller Service Villages, and Other Villages / Hamlets
- Option E: Towns, Stevenage and Welwyn Garden City
- Option F: Settlements within Transport Corridors.



6.1.2 The growth options and supportive text are illustrated and described in Table 8 as taken from the Core Strategy Issues and Options consultation document.

6.1.3 Whichever development strategy option is chosen, the Council will still need to distribute the required number of houses between the identified settlements. Whilst recognising that more work is required on this, the Council has set out six approaches to housing distribution. These have also been appraised, building on the analysis of the Development Strategy Options. The six approaches are:

- Approach I: Proportional distribution
- Approach II: Adjusted proportional distribution
- Approach III: Reversed proportional distribution
- Approach IV: Equal distribution
- Approach V: Distribution by land availability
- Approach VI: Distribution by settlement type.

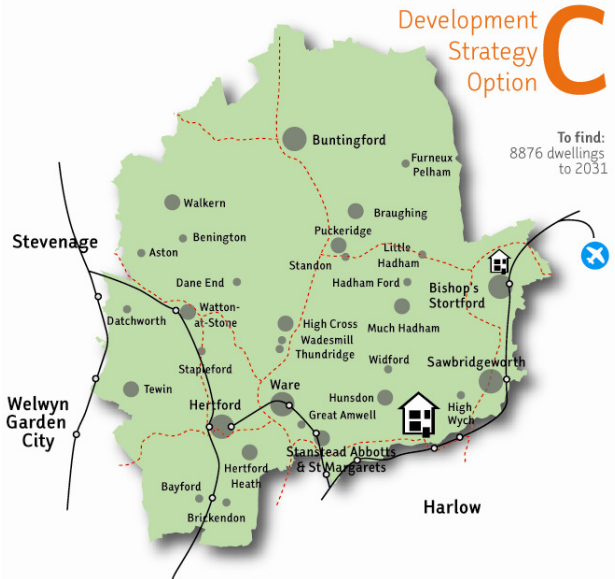

¹⁷ It is important to note that these development strategy options do not deal with the growth to the north of Harlow as it is dealt with separately in Chapter 10 of the Issues and Options.

Table 8: Development Strategy Options

 <p>Development Strategy Option A</p> <p>To find: 8876 dwellings to 2031</p>	 <p>Development Strategy Option B</p> <p>To find: 8876 dwellings to 2031</p>
<p>Option A: Towns</p> <p>This option focuses all development in and around the five towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. Although their populations vary in size from 5,245 to 35,325, the five towns are existing sustainable locations for growth, owing to the wide range of services and facilities on offer.</p> <p>Using evidence from the Call for Sites, under Option A there is a theoretical total of 580 hectares of housing land available for development to 2031, equivalent to 11,600 dwellings (assuming a gross density of 20 dph). This is sufficient to meet the District housing requirement of 8,876¹⁸. Whilst [the Council] believe that Option A is feasible, as with any strategy there are both advantages and disadvantages, and a number of further considerations.</p>	<p>Option B: Towns and Larger Service Villages</p> <p>Option B focuses growth on the five towns and the larger service villages all of which are regarded as being sustainable locations for development. It acknowledges that in addition to the five towns there are several larger villages which also provide facilities to the wider rural area and act as service centres.</p> <p>The identification of larger villages and the acknowledgment of the role they play as local service centres, especially for the rural area, recognises that East Herts has a dispersed settlement pattern where no single settlement dominates. The network of larger service villages was also identified in the Interactive LDF Sessions.</p> <p>Using evidence from the Call for Sites, under Option B there is a theoretical total of 764.6 hectares of land available for development to 2031 equivalent to 15,292 dwellings (assuming a gross density of 20 dph). This is sufficient to meet the District housing requirement of 8,876¹⁹. Whilst [the Council] believe that Option B is feasible, as with any strategy there are both advantages and disadvantages and a number of further considerations</p>



¹⁸ Based on the revised draft RSS to 2031 a lower figure of 7,276 will be considered in the final version of the Issues and Options document. However, since the RSS to 2031 is still in draft format this is expressed as a range.

¹⁹ Ibid.

	
<p>Option C: Towns, Larger Service Villages, and Smaller Service Villages</p> <p>This is the approach of the Local Plan 2007 which identified six Main Settlements and three categorisations of villages depending on their level of facilities and services.</p> <p>Broadly speaking, the six Main Settlements (i.e. the five towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware plus the settlement of Stanstead Abbots & St Margarets) would receive the majority of growth; the larger service villages (Category 1 Villages) would receive some growth and the smaller service villages (Category 2 Villages) would receive limited growth. The remainder of the rural area (referred to as Category 3 Villages) would receive no growth.</p> <p>Using evidence from the Call for Sites, under Option C there is a theoretical total of 988.2 hectares of housing land available, for development to 2031 equivalent to 19,764 dwellings (assuming a gross density of 20 dph). This is sufficient to meet the District housing requirement of 8,876²⁰. Whilst [the Council] believe that Option C is feasible, as with any strategy there are both advantages and disadvantages and a number of further considerations.</p>	<p>Option D: Towns, Larger Service Villages, Smaller Service Villages and Other Villages / Hamlets</p> <p>This 'pepperpot' approach acknowledges the dispersed settlement pattern of East Herts District and seeks to sustain and enhance the vitality of all settlements irrespective of size.</p> <p>Unlike Option C which identifies main settlements and 3 categories of villages. This option focuses development in the five towns and larger service villages but still disperses limited growth right across the whole of East Herts. Although it is perhaps the least sustainable option, it acknowledges the reality that East Herts has a dispersed settlement pattern.</p> <p>Using evidence from the Call for Sites, under Option D there is a theoretical total of 1,240.6 hectares of land available for development to 2031 equivalent to 24,812 dwellings (assuming a gross density of 20 dph). This is sufficient to meet the District housing requirement of 8,876²¹. Whilst [the Council] believe that Option D is feasible, as with any strategy there are both advantages and disadvantages and a number of further considerations.</p>

²⁰ Ibid.

²¹ Ibid.

 <p>Option E: Towns, Stevenage and Welwyn Garden City</p> <p>Although East Herts is not responsible for planning in Stevenage and Welwyn Garden City, these towns lie on the boundary with East Herts and exert an influence on the surrounding rural area and many East Herts residents access these towns for services and facilities. It is considered sensible therefore, that alongside focusing growth in the five towns, that growth could be accommodated in large sustainable urban extensions located within East Herts District to the east of each of these towns.</p> <p>The identification of a large scale (e.g. 1000+ homes) sustainable urban extension to the east of Stevenage was identified at the interactive LDF sessions whilst the Call for Sites has suggested development to the east of Welwyn Garden City. It is therefore sensible to include settlement extensions as a realistic option.</p> <p>Using evidence from the Call for Sites, under Option E there is a theoretical total of 801.7 hectares of land available for development to 2031 equivalent to 16,034 dwellings (assuming a gross density of 20 dph). This is sufficient to meet the District housing requirement of 8,876²². Whilst [the Council] believe that Option E is feasible, as with any strategy there are both advantages and disadvantages and a</p>	 <p>Option F: Settlements within Transport Corridors</p> <p>Option F seeks to focus growth in settlements located within the identified transport corridors including towns, larger villages and other villages. The distribution of development based on transport routes emerged from the interactive LDF sessions where suggestions for new passenger transport routes were also made. However, such infrastructure is extremely costly and careful consideration needs to be given to capacity and viability issues.</p> <p>Because of the lack of east-west rail routes, the transport corridors include rail, road and bus routes. Although development would be focused along transport corridors, this approach would not result in continuous urban sprawl. Rather, each settlement would retain its separate identity through the identification of strategic open space. In essence, a settlement pattern based on the notion of 'beads on a string' would emerge.</p> <p>Using evidence from the Call for Sites, under Option F there is a theoretical total of 113.2 Hectares of land available for development to 2031 equivalent to 22,264 dwellings (assuming a gross density of 20 dph). This is sufficient to meet the District housing requirement of 8,876²³. Whilst [the Council] believe</p>
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²² Ibid.

²³ Ibid.

number of further considerations.	that Option F is feasible, as with any strategy there are both advantages and disadvantages and a number of further considerations.
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6.2 Appraisal of Development Strategy Options against Spatial Areas

6.2.1 This section sets out the appraisal of the growth options against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 9 summarises the significance of the expected impact.

Table 9: Appraisal of the development strategy options against the SA framework spatial areas

Scoring key						
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)		
Scoring for Spatial Areas						
	Option A: Towns	Option B: Towns and Larger Service Villages	Option C: Towns, Larger Service Villages, and Smaller Service Villages	Option D: Towns, Larger Service Villages, Smaller Service Villages and Other Villages / Hamlets	Option E: Towns, Stevenage and Welwyn Garden City	Option F: Settlements within Transport Corridors
A1 (M) Corridor	+ / -	+ / -	+ / -	+ / -	-	+ / ?
Hertford-Ware Area	+	+	+ / ?	-	+	+
M11 Stort Corridor	+ / -	+ / -	+ / -	-	+	+
Rural Service Centres	0	+	+	+ / -	+ / -	- / ?
Rural Area	-	-	0	+ / -	-	+ / -
North of Harlow	-	-	-	-	0	0

A1(M) Corridor

6.2.2 Option A, whilst improving access to services and facilities and supporting a step change towards more sustainable transport patterns, could also lead to significant negative effects on settlements elsewhere in the district as restrictions on development in these places could

hinder their vitality and lead to increased levels of out-commuting as jobs and employment are located elsewhere.

- 6.2.3 Options B and C will lead to tensions within the spatial area between the need to improve access to housing and services and for improving housing affordability, and the need to increase provision and use of more sustainable modes of transport. These options could remit in higher levels of personal car use, particularly given the proximity to the strategic road network and the high levels of development planned in adjacent centres.
- 6.2.4 It is considered likely that the 'pepperpotting' approach presented by Option D will significantly increase the high levels of personal car use, particularly given the proximity to the strategic road network and the high levels of development planned in adjacent local planning authority areas.
- 6.2.5 Option E may lead to significant negative effects in terms of congestion within the A1(M) corridor. There are also concerns over the impacts that this scale of concentrated development would have on the local landscape and the potential for coalescence with villages and hamlets in these areas.
- 6.2.6 The uncertainty with Option F reflects the extent to which this option is able to provide a step change towards more sustainable transport patterns.

Hertford-Ware Area

- 6.2.7 With Option C there are tensions between the need to increase provision and use of more sustainable modes of transport and help to relieve issues of housing affordability in this area. However, the impact that additional levels of growth concentrated within this area would have on congestion on the A414 in particular is uncertain.
- 6.2.8 It is considered likely that the 'pepperpotting' approach presented under Option D will not facilitate a shift towards more sustainable modes of transport and would most likely have a negative impact on the local road network.

M11 Stort Corridor

- 6.2.9 Under options A, B and C there are tensions between the need to increase sustainable modes of transport and relieve issues of housing affordability, and the need to ensure that the environmental integrity of the Stort Valley is maintained. However, under Option C it is recognised that greater levels of housing provision could also help to address deficiencies in access to public open space.
- 6.2.10 It is considered likely that the 'pepperpotting' approach presented under Option D will not facilitate a shift towards more sustainable modes of transport and would most likely have a negative impact on congestion of the local road network. In addition, this approach could also lead to negative impacts on the environmental integrity of the Stort Valley.

Rural Service Centres

- 6.2.11 Under Options B and C provision of some levels growth towards the Rural Service Centres should help to ensure the maintenance and viability of local facilities and services without placing too much pressure on the local distinctiveness and character of these areas.

- 6.2.12 Under Option D and E provision of some levels growth towards the Rural Service Centres should help to ensure the maintenance and viability of local facilities and services without placing too much pressure on the local distinctiveness and character of these areas. However, this option is not likely to lead towards more sustainable travel patterns. Under Option E the needs of Puckeridge are not addressed and there are also concerns over the impacts of development on traffic within Buntingford and the distinctiveness and character of the village.
- 6.2.13 Under Option F the poor existing levels of public transport patronage and lack of rail facilities suggest that this option will lead to further increases in private car use.

Rural Area

- 6.2.14 Options A, B and E would lead to restrictions in growth in rural areas thereby leading to significant negative effects for the local economies in these parts of the district. Whilst it is assumed that the Council will include rural exceptions policies within their Core Strategy as a means by which housing for local people can be provided, there is also a need to ensure that appropriate employment is allowed to develop in these communities as well.
- 6.2.15 Under Option D some growth within the rural area will likely help to support and enhance the quality of life and economic diversification whilst also contributing towards alleviating issues of housing affordability. There are concerned over the potential negative effects of development on traffic and local distinctiveness issues.
- 6.2.16 Whilst improving access to services and facilities, Option F will not meet the needs of a large portion of those living within rural areas and could lead to increased traffic, particularly in areas further away from rail stations.

North of Harlow

- 6.2.17 Under Options A, B, C and D the cumulative negative impacts stemming from high levels of development to the east and west of north of Harlow will lead to increased pressure on the A414 in the southern part of the District. Under Options B, C and D the higher growth in the larger service villages to the north of Harlow will place additional pressure on landscape, biodiversity and high grade agricultural land.

6.3 Appraisal of Development Strategy Options against Topic Areas

- 6.3.1 This section sets out the appraisal of the growth options against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 10 summarises the significance of the expected impact.

Table 10: Appraisal of the development strategy options against the SA framework topic areas

Scoring key				
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)

Scoring for Topic Areas						
	Option A: Towns	Option B: Towns and Larger Service Villages	Option C: Towns, Larger Service Villages, and Smaller Service Villages	Option D: Towns, Larger Service Villages, Smaller Service Villages and Other Villages / Hamlets	Option E: Towns, Stevenage and Welwyn Garden City	Option F: Settlements within Transport Corridors
Air quality	+ / -	-	-	-	+ / -	?
Biodiversity and green infrastructure	+ / -	+	+	+ / -	+ / -	- / ?
Climate change	+ / -	-	-	-	+ / -	?
Community and wellbeing	+ / -	+ / -	+ / -	+ / -	+ / -	+ / -
Economy and employment	-	-	+	+ / - / ?	-	-
Historic environment	-	0	0	0	-	0
Housing	+ / -	+	+	-	-	-
Land	-	-	+	+	-	+
Landscape	+	+	0	-	+	-
Transport	+ / -	+ / -	-	-	+ / -	?
Water	-	-	-	-	-	-

Air quality

- 6.3.2 Concentrating growth under options A and E may lead to improved air quality across the wider District however, pressure would result on areas of poor air quality in Bishop's Stortford and Hertford. More dispersed options (B, C, D and possibly F) would likely lead to greater traffic levels and trip generation. The extent to which Option F facilitates a step change towards more sustainable transport patterns is at present unclear in light of concerns over capacity and viability.

Biodiversity and green infrastructure

- 6.3.3 Under Option A the concentration of growth is not likely to lead to significant impacts on the majority of environmentally designated areas. However, significant negative effects on county wildlife sites may be experienced from growth in and around Hertford (to the north, east, south and west) and Ware (to the south and west). The spatial pattern of Hertford in particular with its 'green fingers' offers opportunity to link growth with increased provision of or improvements to green infrastructure.
- 6.3.4 Under Options B, C and D more moderate amounts of focused growth in these areas will likely result in flexibility to avoid negative significant effects on biodiversity whilst offering the potential to incorporate green infrastructure features. Under Option D it was identified that secondary impacts as a result of failing to achieve more sustainable transport patterns may also lead to significant negative effects on biodiversity.
- 6.3.5 Under Option E significant negative effects on biodiversity may be experienced as a result of concentrating growth within a few centres, thereby providing less flexibility over the location of development in order to avoid impacts. With this option there is also concern over the impact of development to Key Biodiversity Areas (KBAs) 10 (Cottered/Ardeley/Benington) and 17 (Lower Mimram/Lower Beane/Bramfield Plateau) in light of the extensions to Stevenage and Welwyn Garden City.
- 6.3.6 Under Option F the distribution of development may lead to secondary impacts on biodiversity as a result of failing to achieve more sustainable transport patterns.

Climate change (mitigation and adaptation) (includes flood risk)

- 6.3.7 Under Option A the concentration of development in and around the five towns will lead to opportunities to reduce GHG emissions by facilitating a modal shift in transport use. There are potentially significant negative effects due to risk of surface water flooding within Bishop's Stortford, Sawbridgeworth and Hertford.
- 6.3.8 Under Options B, C and D the dispersal of development through these options will likely fail to achieve a significant reduction in private car use however; the more concentrated development approach provided by Option B offers a relatively better choice.
- 6.3.9 Under Option E the concentration of development in these areas will likely lead to opportunities to reduce GHG emissions by facilitating a modal shift. However, there may also be potentially significant negative effects due to risk of surface water flooding within Bishop's Stortford, Sawbridgeworth and Hertford.
- 6.3.10 The uncertainty regarding climate change with Option F is due to the lack of understanding how this option will perform over the plan period and whether it will lead to a decrease in private car use.

Community and wellbeing

- 6.3.11 The potential effects of the Development Strategy options must be considered against the relatively prosperous nature of East Herts as a whole. A key issue identified in the Scoping Report is the need to meet the overall needs of the population across the district; options which concentrate development in relatively few locations will thus have negative effects. This could also lead to poor air quality in some locations with subsequent negative health impacts.

However, greater levels of growth (provided through all options) will also help to support more services and facilities which will help to meet the needs of the population and capitalise on the benefits of an expanding Stansted Airport. Particular issues related to community and wellbeing for individual settlements may be drawn out in the Chapters 7 to 13 and a separate Equality and Diversity commentary is provided in Chapter 14.

Economy and employment

- 6.3.12 Under Option A the provision of growth towards the five towns will allow for economic growth and employment in these areas, however this option does not address the wider needs of the District.
- 6.3.13 Under Option B the provision of growth towards the five towns and Larger Service Villages will allow for economic growth and employment in these areas, however, this option does not address the wider needs of the District and could lead to a loss of vitality of the smaller rural villages by restricting development in these areas.
- 6.3.14 Under Option C the provision of growth would help to meet the economic and employment needs of the wider District. Concerns could be raised over the potential negative effects of growth restraint in the smallest villages and hamlets. However, support from facilitating development in smaller service villages is likely to mean that the effects are not significant.
- 6.3.15 Under Option D this option could potentially meet the economic and employment needs across the District, however further consideration would be required as to the distribution. There is also some concern that this option could have secondary effects on traffic generation due to the dispersal of employment and it may also constrain growth in the primary towns.
- 6.3.16 Neither Options E nor F would meet the economic and employment needs of the wider district as development under Option E would restrict growth outside these select areas and Option F would restrict growth outside of transport corridors.

Historic environment

- 6.3.17 The concentration of growth under Option A may lead to significant negative effects on the historic character of the five main towns as well as the scheduled monuments within and around these areas as there would be less flexibility to avoid these effects.
- 6.3.18 Options B, C, D and F should provide some flexibility for avoiding significant negative impacts on the historic environment in the main towns and larger service villages. Whilst pressure would result from this option, appropriate safeguarding policies should be achievable to minimise risk.
- 6.3.19 Growth to the east of Stevenage and Welwyn Garden City under Option E would likely lead to significant negative effects on elements of the historic environment in and around the areas of development. Features which could be affected include Registered Parks and Gardens, SAMs and Conservation Areas.

Housing (includes gypsies and travellers)

- 6.3.20 All options would meet the required housing targets set by the East of England Plan.
- 6.3.21 Option A would likely lead to positive effects in terms of improving accessibility to services and facilities however, it would most likely involve significant development on greenfield land.

- 6.3.22 Options B and C would lead to positive effects by improving overall accessibility to services and facilities.
- 6.3.23 Under Option D the pepperpot approach would likely lead to decreased accessibility and smaller development sites could lead to lower levels of affordable housing provision.
- 6.3.24 Under Options E and F the housing needs of those living across the District, and not just within the areas defined under these options, would not be met.
- 6.3.25 It is assumed that under all Options, and in line with paragraph 3.2.7 of the Issues and Options, appropriate provision of sites for Gypsies and Travellers and Travelling Showpeople will be made (additional comments on these issues are provided in the Equalities Statement Section).

Land (includes waste)

- 6.3.26 Whilst improving feasibility of recycling by making collection more cost effective, Options A, B and E could place additional pressure on the quality of groundwater aquifers (as development may proceed on inner source protection zones) and would likely lead to development on greenfield land and in the Green Belt.
- 6.3.27 Under Options C, D and F the distribution of development would not lead to significant pressure on aquifers and may help to ensure that land take for greenfield land and land within the Green Belt is minimised.

Landscape

- 6.3.28 Under Options A, B and E focusing development in a smaller number of settlements should help to ensure that impacts on the wider landscape character of East Herts is minimised.
- 6.3.29 Under Options D and F the distribution of development would likely lead to cumulative impacts on landscape character and indirect impacts through greater trip generation which would affect landscape considerations such as tranquillity.

Transport

- 6.3.30 Under Options A, B and E, focusing development within existing urban centres with better transport links should help to facilitate a modal shift and reduce reliance on private car use. However, higher levels of development will lead to increased congestion and under these options rural accessibility will likely worsen.
- 6.3.31 Under Options C and D the distribution of development would likely encourage unsustainable travel patterns and fail to bring forward a modal shift towards more sustainable patterns.
- 6.3.32 Under Option F the rural nature of the District and poor existing levels of bus provision, particularly in the northern part of the District, may lead to greater use of private car use however the effects over the entire plan period are uncertain.

Water

- 6.3.33 Water scarcity within the East of England means that any level of development will place additional pressure on water resources.

6.4 Appraisal of Housing Distribution Options against Spatial Areas

6.4.1 This section sets out the appraisal of the Housing Distribution Options. Table 11 summarises the significance of the expected effects. In light of the large number of potential effects, the appraisal has focused only on the permutations of options that would lead to development within a spatial area. For example, 'Option A: Towns' distributed according to 'Approach III: Reversed Proportional Distribution' would still not lead to any development within rural areas or north of Harlow.

6.4.2 In consideration of the Development Strategy Options, the Housing Distribution Options suggest a more refined spatial distribution of development across the district however, this involves higher levels of uncertainty with respect to the actual distribution of housing to specific settlements and in specific locations. In light of this uncertainty, the comments associated with the appraisal of Approaches III, IV and VI reflect the identified likely significant effects based on certain principles. For example, where the housing distribution is likely to lead to a dispersal of development, it was determined that there would likely be negative effects against spatial areas experiencing traffic congestion and against climate change due to increased trip generation using private vehicles.

Table 11: Appraisal of housing distribution options against the SA framework spatial areas

Scoring key				
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)

Scoring for Spatial Areas						
	Approach I: Proportional distribution	Approach II: Adjusted proportional distribution	Approach III: Reversed proportional distribution	Approach IV: Equal distribution	Approach V: Distribution by land availability	Approach VI: Distribution by settlement type
A1 (M) Corridor	The SA findings are likely to reflect those for Strategy Development Options A-F above	The SA findings are likely to reflect those for Strategy Development Options A-F above	-	+ / -	Whilst the SA findings are likely to reflect those for Strategy Development Options A-F any significant effects would be dependent on the site allocations.	+ / -
Hertford-Ware Area			-	+ / -		+ / -
M11 Stort Corridor			-	+ / -		+ / -
Rural Service Centres			+ / -	+ / -		+ / -
Rural Area			+ / -	+ / -		+ / -
North of Harlow			-	+ / - / ?		+ / -

Approaches I, II and V

- 6.4.3 It was determined that the likely effects from Approaches I and II are not likely to be significantly different to those identified previously for Development Strategy Options A-F (detailed impacts identified are described in section 6.2). This is largely because the appraisal of the development strategy options were based on similar assumptions in terms of housing distribution. In terms of Option V, a precautionary perspective has been taken here which recognises that the likely effects of housing distribution are similar to those identified for Options A-F, but their impacts would ultimately be dependent on site allocations which are presently unknown.

Approach III: Reversed proportional distribution

- 6.4.4 Approach III would likely decrease opportunities to achieve a modal shift towards more sustainable transport and for improving access to housing and services. The possible impacts of housing affordability are unclear. The growth of the smaller settlements, particularly within rural areas, would likely support the vitality of towns and villages but lead to negative impacts against their local distinctiveness and character.

Approach IV: Equal distribution

- 6.4.5 The approaches which lead to the greater dispersal of growth will make it more difficult to achieve a modal shift towards more sustainable transport and for improving access to housing and services. The growth of the smaller settlements, particularly within rural areas, would likely support the vitality of towns and villages but lead to negative impacts against their local distinctiveness and character.

Approach VI: Distribution by settlement type

- 6.4.6 The provision of growth away from the towns and larger settlements would make it more difficult to achieve a modal shift towards more sustainable transport and for improving access to housing and services. The growth of the smaller settlements, particularly within rural areas, would likely support the vitality of towns and villages but lead to negative impacts against their local distinctiveness and character.

6.5 Appraisal of Housing Distribution Options against Topic Areas

- 6.5.1 This section sets out the appraisal of the housing distribution options against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 12 summarises the significance of the expected impact.

Table 12: Appraisal of the housing distribution options against the SA framework topic areas

Scoring key						
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)		
Scoring for Topic Areas						
	Approach I: Proportional distribution	Approach II: Adjusted proportional distribution	Approach III: Reversed proportional distribution	Approach IV: Equal distribution	Approach V: Distribution by land availability	Approach VI: Distribution by settlement type
Air quality	The SA findings are likely to reflect those for Strategy Development Options A-F above	The SA findings are likely to reflect those for Strategy Development Options A-F above	-	-	Whilst the SA findings are likely to reflect those for Strategy Development Options A-F any significant effects would be dependent on the site allocations	-
Biodiversity & green infrastructure			- / ?	-		0
Climate change			-	-		-
Community & well-being			0 / ?	0 / ?		0 / ?
Economy & employment			+ / -	+ / -		+ / -
Historic environment			+ / -	+ / -		+ / -
Housing			+ / -	+ / -		+ / -
Land			-	-		-
Landscape			-	-		-
Transport			+ / -	+ / -		+ / -
Water			-	-		-

Air quality

- 6.5.2 Approaches III, IV and VI suggest higher levels of dispersion with significant development in rural settlements. These would be located away from public transport services and employment opportunities thereby leading potentially significant effects on air quality as reliance on private vehicle use is encouraged within the rural areas as well as within town centres.

Biodiversity and green infrastructure

- 6.5.3 The provision of higher growth to smaller settlements under Approach III and IV may lead to higher levels of greenfield landtake with corresponding negative effects on biodiversity.

Climate change (mitigation and adaptation) (includes flood risk)

- 6.5.4 It is clear that approaches III, IV and VI would all lead to higher rates of growth within the rural areas and therefore provide a greater reliance on private car use and more trip generation.

Community and wellbeing

- 6.5.5 The higher levels of distribution which would emerge particularly through Options III, IV and VI would potentially make it more difficult to ensure that the needs of an aging population are met. This is because it would decrease overall levels of accessibility to key services and facilities.

Economy and employment

- 6.5.6 Smaller and particularly rural settlements may potentially receive some benefits from approaches which led to higher levels of growth in these areas. However, constraining growth in the main towns and settlements could have negative repercussions for these areas, and particularly for the local retail offer.

Historic environment

- 6.5.7 Approaches which direct growth away from the main towns will help to ease pressure on the Conservation Areas within these settlements. It could also potentially provide greater flexibility for avoiding impacts on historical assets. Higher provision of growth to the rural areas would potentially lead to a higher risk of inappropriate development, depending on the nature of the sites brought forward.

Housing (includes gypsies and travellers)

- 6.5.8 Approaches which direct greater levels of growth towards the smaller settlements, particularly in the rural area could help to ease affordability problems in these communities. However, it could exacerbate similar issues within the larger towns and would potentially fail to achieve PDL targets.

Land (includes waste)

- 6.5.9 Approaches which lead to higher levels of growth towards the smaller communities, particularly those within rural areas, are likely to require more greenfield and agricultural land take. Additionally, it could make it more difficult (i.e. less cost effective) to provide better recycling services, particularly as future technologies are developed and implemented.

Landscape

- 6.5.10 Higher levels of growth within rural areas are more likely to have significant negative effects on the landscape character of these areas, particularly where their built form is naturally constrained by topography. The expected higher levels of traffic generated by more dispersed options are likely to lead to secondary negative effects on the character of the landscape by affecting considerations such as tranquillity.

Transport

- 6.5.11 Approaches which lead to higher levels of growth towards those communities that are currently located further away from existing public transport, services, facilities and employment are

likely to lead to even greater congestion across the District and the wider transport network. However, the viability of rural bus services is likely to be improved by these approaches.

Water

- 6.5.12 As the entire area is classed as severely stressed in terms of water resources, any levels of growth are likely to have a negative effect against this topic.

6.6 Mitigation

- 6.6.1 From the appraisal of the development strategy and housing distribution options there are recommendations that we can make to the Council to improve the sustainability of current options. These include sustainability considerations to guide the Council as they continue to develop their Core Strategy. SA recommendations for mitigation are provided in Table 13.

Table 13: Mitigation (Scott Wilson's recommendations)

Topic	Mitigation Recommendations
A1 (M) Corridor	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion Development should also be concentrated near to public transport, employment locations, and existing services and facilities
Hertford – Ware Area	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion Development should also be concentrated near to public transport, employment locations, and existing services and facilities
M11 Stort Corridor	<ul style="list-style-type: none"> Safeguarding policies to protect the integrity of the Stort Development within this area may require demand management measures to discourage additional congestion Development should seek to integrate with key green infrastructure assets
Rural Service Centres	<ul style="list-style-type: none"> Development within this area may require demand management measures (e.g. ensure rural bus provision, seek to remove village 'rat runs', provision of cycling facilities e.g. storage sheds, bike lanes) to discourage additional congestion
Rural Area	<ul style="list-style-type: none"> Ensure an appropriate balance between growth required to support the vitality of rural areas and the potential impacts of growth on traffic and congestion
North of Harlow	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion and to minimise trip generation Need to safeguard the quality of the local landscape, historic environment, biodiversity and high grade agricultural land through the allocation of land and the use of additional policy, where feasible Maximise the potential of green infrastructure opportunities provided within the area, e.g. natural and semi-natural greenspaces and green corridors such as streams or hedgerows Ensure that development does not harm the integrity of the River Stort
Air Quality	<ul style="list-style-type: none"> There is a need to ensure that growth is not overly concentrated, particularly in Bishop's Stortford and Hertford as these towns already experience relatively poor air quality in certain areas Appropriate demand management schemes, and contribution to the effectiveness of these schemes through integrating with LTP3, should be developed across the district
Biodiversity and Green	<ul style="list-style-type: none"> Safeguarding measures are required to ensure development does not lead to negative impacts, particularly around Hertford and Ware as a function of

Infrastructure	concentrating development in these areas
Climate Change	<ul style="list-style-type: none"> Measures will be required to minimise the risk of surface water flooding, particularly if development is concentrated in relatively few places Development should not be too dispersed across the District in order to minimise traffic generation and reduction of GHG emissions A risk-based approach to understanding current and future vulnerability to climate change could be developed for the District
Economy and Employment	<ul style="list-style-type: none"> The dispersal of development should not overly constrain the vitality of rural areas across the District Rural exceptions policy will help to address needs in smaller settlements under a restricted growth option for these areas
Historic Environment	<ul style="list-style-type: none"> Concentrating development within the main towns (Options A and E) would require appropriate safeguarding policies for these areas, including the possible development of Area Character SPDs
Housing	<ul style="list-style-type: none"> Development should be facilitated across the District and not just located within the main towns and villages Additional housing could be delivered to help achieve greater numbers of affordable housing providing appropriate policies were in place to facilitate this
Land	<ul style="list-style-type: none"> Development should seek to avoid inner source protection zones
Landscape	<ul style="list-style-type: none"> The negative effects of dispersed development would require strong design and development control policies
Transport	<ul style="list-style-type: none"> Demand management policies will be required to minimise congestion and trip generation Attention should be given towards facilitating rural bus services
Water	<ul style="list-style-type: none"> Strong policies are required to minimise water use and maximise water efficiency

7 Appraisal of Options for Bishop's Stortford

7.1 Introduction

7.1.1 This section appraises the potential future growth options for the Bishop's Stortford town against the SA spatial areas and topics (the SA framework). East Herts has generated future development options and emerging visions for five different towns plus villages and an approach to development to the north of Harlow.

- **Bishop's Stortford**

- Buntingford
- Hertford
- Sawbridgeworth
- Ware
- Villages
- North of Harlow

7.1.2 Five potential growth options for Bishop's Stortford are identified in the Core Strategy Issues and Options consultation document:

- Option 1: Town Centre / Within the Existing Urban Area
- Option 2: To the Northeast
- Option 3: To the East
- Option 4: To the Southeast
- Option 5: To the South

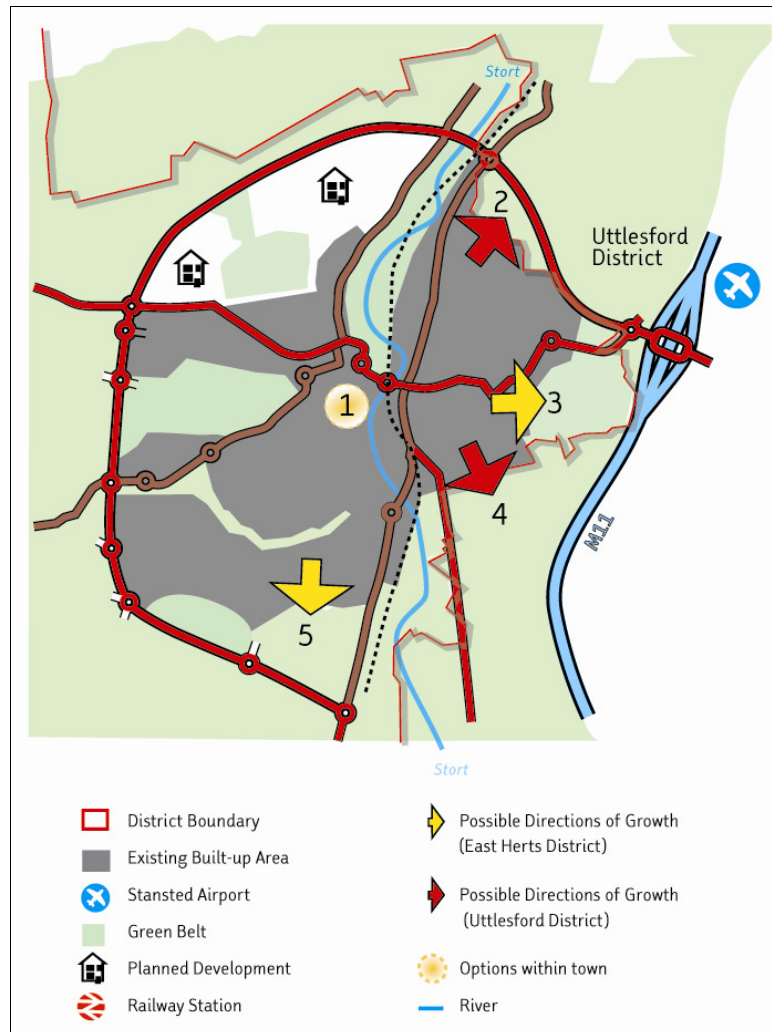
7.1.3 The growth options are illustrated in Figure 3 and are described in the box below, as taken from the Core Strategy Issues and Options consultation document.

Bishop's Stortford – growth options

To accommodate growth in and around Bishop's Stortford, five potential growth options have been identified. The purpose of these options is not to identify specific sites (which will be identified in subsequent LDF Documents) but rather to flag up potential issues such as infrastructure constraints that may shape how Bishop's Stortford grows to 2031. Please note that these options may not be mutually exclusive and that growth could occur in more than one direction, subject to the development strategy and distribution strategy we adopt. The growth options presented seek to deal with the 'to-find' figure of 8,876²⁴ and are therefore, in addition to the development of any remaining Local Plan allocations. As such, these sites have not been shown.

²⁴ Based on the revised draft RSS to 2031 a lower figure of 7,276 will be considered in the final version of the Issues and Options document. However, since the RSS to 2031 is still in draft format this is expressed as a range.

Figure 3: Growth Options for Bishop's Stortford to 2031 (indicative only)



7.2 Appraisal against Spatial Areas

7.2.1 This section sets out the appraisal of the growth options for Bishop's Stortford against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 14 summarises the significance of the expected impact.

Table 14: Appraisal of the Bishop's Stortford growth options against the SA framework spatial areas

Scoring key					
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)	
Scoring for Spatial Areas					
	Option 1: Town Centre / Within the Existing Urban Area	Option 2: To the Northeast	Option 3: To the East	Option 4: To the Southeast	Option 5: To the South
M11 Stort Corridor	+	+ / -	-	-	+ / -

M11 Stort Corridor

- 7.2.2 Whilst Option 2 and 5 would likely lead to higher levels of traffic congestion within the local and strategic road network there are also opportunities presented by all options to utilise the green infrastructure potential of the Stort Valley.
- 7.2.3 It was determined that significant negative effects were likely to arise from Options 3 and 4 due to the potential for them to generate additional traffic through the centre of Bishop's Stortford to access eastern destinations as well as to strongly encourage car-based travel due to their close proximity to M11 Junction 8.

7.3 Appraisal against Topic Areas

- 7.3.1 This section sets out the appraisal of the growth options for Bishop's Stortford against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 15 summarises the significance of the expected impact.

Table 15: Appraisal of the Bishop's Stortford growth options against the SA framework topic areas

Scoring key				
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)

Scoring Matrix for Topic Areas					
	Option 1: Town Centre / Within the Existing Urban Area	Option 2: To the northeast	Option 3: To the east	Option 4: To the southeast	Option 5: To the south
Air quality	-	0	-	-	0
Biodiversity and green infrastructure	0	-	-	-	-

Scoring Matrix for Topic Areas					
Climate change	-	0	0	0	0
Community and wellbeing	0	0	0	0	0
Economy and employment	0	0	0	0	0
Historic environment	-	0	0	0	0
Housing	+	+	+	+	+
Land	+	-	-	-	-
Landscape	0	0	0	0	-
Transport	+	-	-	-	-
Water	-	-	-	-	-

Air quality

- 7.3.2 Options 1, 3 and 4 would likely contribute towards congestion and the worsening of air quality around the Hockerill Street AQMA within the centre of Bishop's Stortford.

Biodiversity and green infrastructure

- 7.3.3 Options 2, 3, 4, and 5 would likely all lead to a need for development on green field land with corresponding risks to biodiversity.

Climate change (mitigation and adaptation) (includes flood risk)

- 7.3.4 Development under Option 1 would potentially lie within Flood Risk Zones 1 or 2 and could also lead to an increased risk of surface water flooding.

Historic environment

- 7.3.5 Option 1 may have a potential negative effect against the historic environment because the centre of Bishop's Stortford has been designated as a Conservation Area.

Land (includes waste)

- 7.3.6 Options 2, 3, 4 and 5 would likely lead to negative, permanent effects against Land because they would require green field land, some of which is currently used for agriculture.

Landscape

- 7.3.7 Option 5 may lead to negative effects due to the sloping nature of the site and the impact this may have on the setting of the town.

Transport

- 7.3.8 Whereas the central location and proximity to the rail station suggests beneficial impacts from Option 1, particularly in light of Stansted Airport as a key employment location. Options 2, 3, 4 and 5 would all likely result in increased car-based travel at least within the short to medium

plan period. This judgement is based on current high levels of car ownership and the proximity of these sites to the strategic road network.

Water

- 7.3.9 Water scarcity within the East of England mean that any level of development will place additional pressure on water resources.

7.4 Mitigation

- 7.4.1 From the appraisal of Options 1-5 for Bishop's Stortford the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

Table 16: Mitigation (Scott Wilson's recommendations)

Topic	Mitigation Recommendations
M11 Stort Corridor	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion and minimise trip generation Potential impacts on the integrity of the Stort Valley must be considered
Air Quality	<ul style="list-style-type: none"> Demand management may be required to ensure that air quality within the Hockerill St Junction AQMA is not degraded further
Biodiversity and Green Infrastructure	<ul style="list-style-type: none"> A Green Belt review should be undertaken prior to approval of development Opportunities to integrate elements of existing green infrastructure should be maximised If development on greenfield land is required then a strategic assessment of greenfield biodiversity value could be undertaken, potentially drawing on available evidence sources (e.g. previous EIAs)
Climate Change	<ul style="list-style-type: none"> Development which is able to maximise use of existing rail and bus services and can facilitate cycling and walking should be prioritised Demand management measures could be put in place that will minimise trip generation Areas of Flood Risk Zone 2 and 3 should be avoided Measures will be required to minimise the risk of fluvial and surface water flooding for development in the town centre
Historic Environment	<ul style="list-style-type: none"> Strong safeguarding policies regarding impacts on Conservation Areas will be required if development is focused within the town centre
Land	<ul style="list-style-type: none"> A Green Belt review should be undertaken prior to approval of development An agricultural land survey could be undertaken to ensure that the lowest quality land is brought forward for development
Landscape	<ul style="list-style-type: none"> Due to the locational constraints from which the potential negative effects emerge it is difficult to apply site-specific measures that will sufficiently minimise harm. Therefore, an alternative option would be suggested or higher proportions of growth distributed elsewhere.

Transport	<ul style="list-style-type: none">• Particularly strong demand management policies are required for development within the town centre to limit the use of cars per household in new build• Demand management policies will be required to minimise congestion and trip generation• Development in areas where access can be improved relatively easily should be prioritised• The provision of sustainable transport infrastructure (i.e. bus routes, station upgrades, cycle and walking pathways) should be in place prior to the arrival of new residents• Requirements for travel plans in new development should be set
Water	<ul style="list-style-type: none">• Strong policies are required to minimise water use and maximise water efficiency

8 Appraisal of Options for Buntingford

8.1 Introduction

8.1.1 This section appraises the potential future growth options for the Buntingford town against the SA spatial areas and topics (the SA framework). East Herts has generated future development options and emerging visions for five different towns plus villages and an approach to development to the north of Harlow.

- Bishop's Stortford
- **Buntingford**
- Hertford
- Sawbridgeworth
- Ware
- Villages
- North of Harlow

8.1.2 Five potential growth options are identified in the Core Strategy Issues and Options consultation document:

- Option 1: Within the Existing Built-up Area
- Option 2: To the South and West
- Option 3: To the North
- Option 4: To the Northeast
- Option 5: To the East

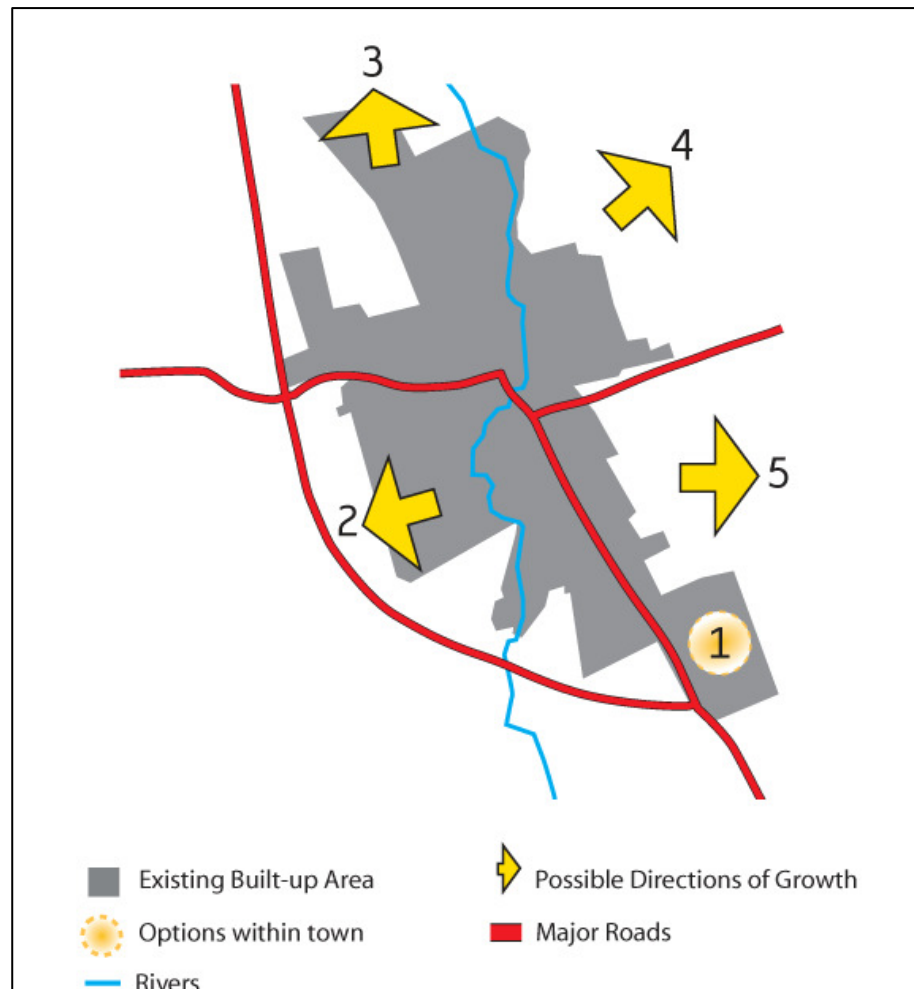
8.1.3 The growth options are illustrated in Figure 4 and are described in the box below, as taken from the Core Strategy Issues and Options consultation document.

Buntingford – growth options

To accommodate growth in and around Buntingford, five potential growth options have been identified. The purpose of these options is not to identify specific sites (which will be identified in subsequent LDF Documents) but rather to flag up potential issues such as infrastructure constraints that may shape how Buntingford grows to 2031. Please note that these options may not be mutually exclusive and that growth could occur in more than one direction, subject to the development strategy and distribution strategy we adopt. The growth options seek to deal with the 'to-find' figure of 8,876²⁵ and are therefore, in addition to the development of any remaining Local Plan allocations. As such, these sites have not been shown.

²⁵ Based on the revised draft RSS to 2031 a lower figure of 7,276 will be considered in the final version of the Issues and Options document. However, since the RSS to 2031 is still in draft format this is expressed as a range.

Figure 4: Growth Options for Buntingford to 2031 (indicative only)



8.2 Appraisal against Spatial Areas

8.2.1 This section sets out the appraisal of the growth options for Buntingford against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 17 below summarises the significance of the expected impact.

Table 17: Appraisal of the Buntingford growth options against the SA framework spatial areas

Scoring key					
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)	

Scoring for Spatial Areas					
	Option 1: Within the existing built-up area	Option 2: To the south and west	Option 3: To the north	Option 4: To the northeast	Option 5: To the east
Rural Service Centres	+	+	+	+	+
Rural Area	+	+	+	+	+

Rural Service Centres

- 8.2.2 Some levels of development are required to support the viability of local facilities and services therefore, no significant negative effects would be anticipated provided development is of an appropriate scale.

Rural Area

- 8.2.3 Preserving the vitality, services and facilities within Buntingford will provide positive benefits for the surrounding rural areas.

8.3 Appraisal against Topic Areas

- 8.3.1 This section sets out the appraisal of the growth options for Buntingford against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 18 below summarises the significance of the expected impact.

Table 18: Appraisal of the Buntingford growth options against the SA framework topic areas

Scoring key					
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)	

Scoring for Topic Areas					
	Option 1: Within the existing built-up area	Option 2: To the south and west	Option 3: To the north	Option 4: To the northeast	Option 5: To the east
Air quality	0	0	0	0	0
Biodiversity and green infrastructure	0	-	-	-	-
Climate change	-	-	-	-	-
Community and wellbeing	0	0	0	0	0
Economy and employment	+	0	0	0	0
Historic environment	0	0	0	0	0
Housing	+ / ?	+	+	+	+
Land	?	-	-	-	-
Landscape	0	0	0	?	?
Transport	-	-	-	-	-
Water	-	-	-	-	-

Biodiversity and green infrastructure

- 8.3.2 Negative effects as a result of Options 2, 3, 4 and 5 have been identified in light of the requirement for development to be located on greenfield land.

Climate change (mitigation and adaptation) (includes flood risk)

- 8.3.3 In light of the high levels of car ownership and poor existing public transport service provision, increasing the amount of residential development within Buntingford will likely lead to increased greenhouse gases emissions due to increased trip generation.

Economy and employment

- 8.3.4 Positive significant benefits were identified as a result of Option 1 in light of the opportunity to facilitate mixed-use facilities through the re-development of the former Sainsburys Distribution Centre.

Housing (includes gypsies and travellers)

- 8.3.5 Positive beneficial effects stem from each of the options presented against this topic because some levels of housing development are important for supporting the vitality of the town.

However, there are concerns over the viability of housing delivery according to Option 1 due to substantial land costs.

Land (includes waste)

- 8.3.6 Once contaminated land has been identified there is a need to either avoid it for use or remediate it. The uncertainty with respect to Option 1 is because the level of contamination is currently unknown for the former Sainsburys Distribution Centre.
- 8.3.7 Options 2, 3, 4 and 5 would likely lead to negative effects because each would require the use of greenfield land, some of which is currently used for agriculture.

Landscape

- 8.3.8 Depending on the scale of development Options 4 and 5 may potentially lead to negative effects against the character of the landscape due to the topography of the valley in which Buntingford is located. Under these options there is potential for development to overlook the town and spill out of the valley.

Transport

- 8.3.9 Despite the existence of a frequent bus services to certain settlements, it is likely that additional development in Buntingford will lead to increased trip generation.

Water

- 8.3.10 Water scarcity within the East of England means that any level of development will place additional pressure on water resources.

8.4 Mitigation

- 8.4.1 From the appraisal of Options 1-5 for Buntingford the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

Table 19: Mitigation (Scott Wilson's recommendations)

Topic	Mitigation Recommendations
Biodiversity and Green Infrastructure	<ul style="list-style-type: none"> • Opportunities to integrate elements of existing green infrastructure should be maximised • If development on greenfield land is required then a strategic assessment of greenfield biodiversity value could be undertaken, potentially drawing on available evidence sources (e.g. previous EIAs)
Climate Change	<ul style="list-style-type: none"> • Measures will be required to minimise the risk of fluvial and surface water flooding for development in the town centre • Development which is able to maximise use of existing bus services and can facilitate cycling and walking should be prioritised • Demand management measures could be put in place that will minimise trip generation
Land	<ul style="list-style-type: none"> • An agricultural land survey could be undertaken to ensure that the lowest quality land is brought forward for development

Landscape	<ul style="list-style-type: none">• Development should avoid growth to the east in order to minimise potential negative impacts on the area's landscape character
Transport	<ul style="list-style-type: none">• Demand management policies will be required to minimise congestion and trip generation• Development in areas where access can be improved relatively easily should be prioritised• The provision of sustainable transport infrastructure (i.e. bus routes, cycle and walking pathways) should be in place prior to the arrival of new residents• Requirements for travel plans in new development should be set
Water	<ul style="list-style-type: none">• Strong policies are required to minimise water use and maximise water efficiency

9 Appraisal of Options for Hertford

9.1 Introduction

9.1.1 This section appraises the potential future growth options for the Hertford town against the SA spatial areas and topics (the SA framework). East Herts has generated future development options and emerging visions for five different towns plus villages and an approach to development to the north of Harlow.

- Bishop's Stortford
- Buntingford
- **Hertford**
- Sawbridgeworth
- Ware
- Villages
- North of Harlow

9.1.2 Five potential growth options are identified in the Core Strategy Issues and Options consultation document:

- Option 1: Town Centre
- Option 2: Within the Existing Urban Area
- Option 3: To the West
- Option 4: To the North
- Option 5: To the South

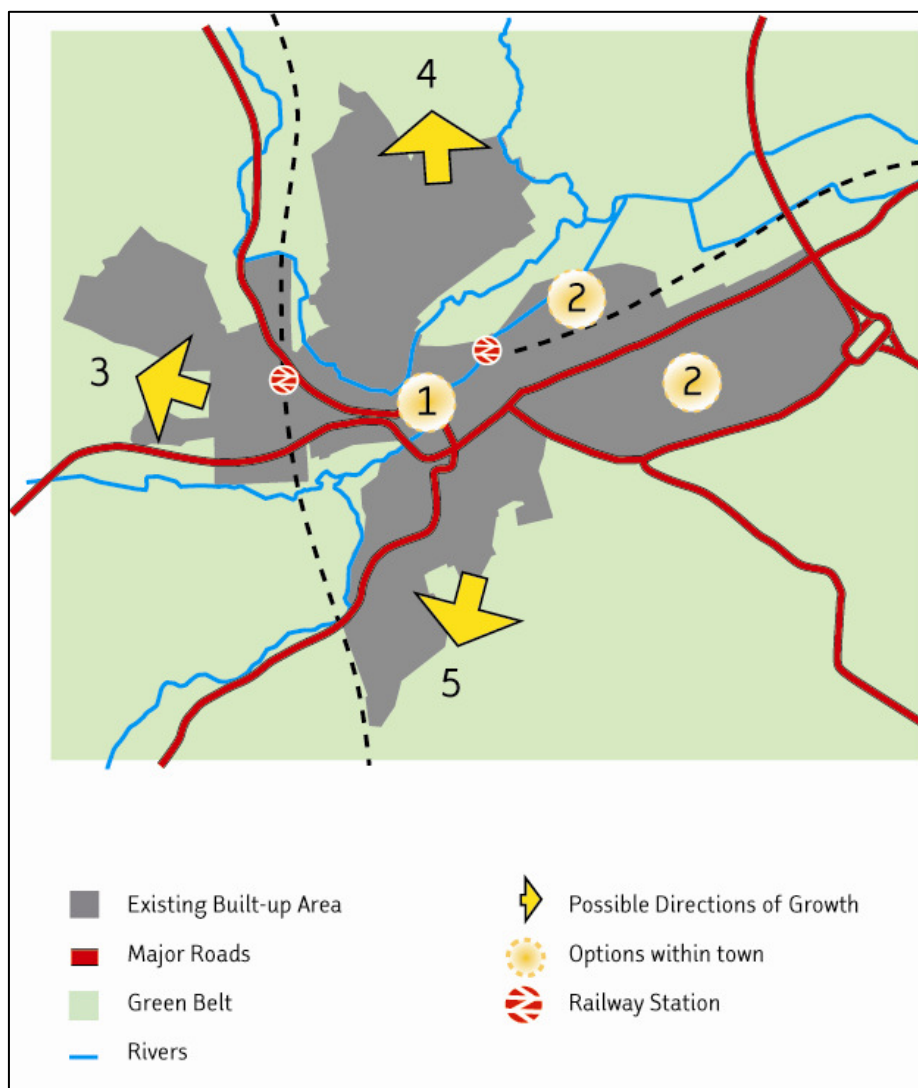
9.1.3 The growth options are illustrated in Figure 5 and are described in the box below, as taken from the Core Strategy Issues and Options consultation document.

Hertford – growth options

To accommodate growth in and around Hertford, five potential growth options have been identified. The purpose of this map is not to identify specific sites but rather to identify potential issues, such as infrastructure constraints, that may have an influence on decisions for the growth of Hertford to 2031. The outcome of the finally adopted District-wide development strategy could mean that that growth may occur in more than one direction. The growth options seek to deal with the 'to-find' figure of 8,876²⁶ and are therefore, in addition to the development of any remaining Local Plan allocations. As such, these sites have not been shown.

²⁶ Based on the revised draft RSS to 2031 a lower figure of 7,276 will be considered in the final version of the Issues and Options document. However, since the RSS to 2031 is still in draft format this is expressed as a range.

Figure 5: Growth Options for Hertford to 2031 (indicative only)



9.2 Appraisal against Spatial Areas

9.2.1 This section sets out the appraisal of the growth options for Hertford against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 20 summarises the significance of the expected impact.

Table 20: Appraisal of the Hertford growth options against the SA framework spatial areas

Scoring key					
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)	

Scoring for Spatial Areas					
	Growth Option 1: Town Centre	Growth Option 2: Existing Urban Area	Growth Option 3: To the West	Growth Option 4: To the North	Growth Option 5: To the South
Hertford-Ware Area	+	+	+ / -	+ / -	+ / -

Hertford-Ware Area

- 9.2.2 Greater levels of development within the area brought forward through all potential options will help to ease housing affordability issues.
- 9.2.3 Under Option 1 and 2 development focused in the town centre and within existing urban areas is likely to have a positive impact against this spatial area because it would promote more sustainable forms of travel and improve access to services and facilities.
- 9.2.4 Options 3, 4 and 5 are outside of the town centre (to the west, north and south) and may encourage greater levels of private car transport, exacerbating existing problems with congestion within the Hertford-Ware area and across the wider transport network.
- 9.2.5 There are also concerns over the potential for coalescence between Hertford and Hertford Heath as a result of Option 5.

9.3 Appraisal against Topic Areas

- 9.3.1 This section sets out the appraisal of the growth options for Hertford against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 21 summarises the significance of the expected impact.

Table 21: Appraisal of the Hertford growth options against the SA framework topic areas

Scoring key					
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)	
Scoring for Topic Areas					
	Growth Option 1: Town Centre	Growth Option 2: Existing Urban Area	Growth Option 3: To the West	Growth Option 4: To the North	Growth Option 5: To the South
Air quality	-	-	-	-	-
Biodiversity and green infrastructure	0	0	-	-	-
Climate change	+ / -	+ / -	-	-	-
Community and wellbeing	+	+	0	0	-
Economy and employment	+	+	0	0	0
Historic environment	-	-	?	?	?
Housing	+ / - ?	+ / -	+ / -	+ / -	+ / -
Land	+	+	-	-	-
Landscape	+	+	-	-	-
Transport	+ / -	+ / -	-	-	-
Water	-	-	-	-	-

Air quality

9.3.2 Traffic congestion is the primary cause of poor air quality within Hertford and is likely to be negatively effected by all growth options.

9.3.3 Options 1 and 2 in particular are likely to increase traffic congestion within the town centre, particularly around the A414 and the A119. Additionally, an AQMA may shortly be declared in Gascoyne Way.

Biodiversity and green infrastructure

9.3.4 By delivering growth on greenfield land, Options 3, 4 and 5 are likely to have a negative impact on the District's biodiversity. Particular assets that could be impacted by development include, wildlife sites and open spaces to the west (Option 3) and north (Option 4), and open spaces and potentially land within a 'green finger' to the south (Option 5).

Climate change (mitigation and adaptation) (includes flood risk)

9.3.5 All options suggest higher levels of development within Hertford and are likely to result in increased greenhouse gas emissions, particularly from transport.

9.3.6 Options 3, 4 and 5 locate development away from rail stations and the majority of services and facilities could lead to increases in private car use.

9.3.7 However, owing to the location of the town centre in the river valley, it is prone to flooding risk which would compromise development under Option 1 and also partly to Option 2 (and potentially under the other growth options).

Community and wellbeing

9.3.8 Although development to the south (Option 5) is close to an existing secondary school the difficulty of accessing the town centre and the existing services and facilities in these areas due to road/route limitations could have a negative impact against this topic area.

Economy and employment

9.3.9 The existing retail offer within the centre of Hertford should receive positive benefits from the close proximity of additional growth as may come forward through Option 1 or Option 2, however there are also concerns that these may not be the most appropriate locations for non-retail employment.

Historic environment

9.3.10 The town centre of Hertford retains much of its medieval character and includes a number of historic assets such as listed buildings. A large Conservation Area covers the town. It is therefore likely that Options 1 and 2, locating development in the town centre and within the existing urban area, will have a significant negative impact on these assets.

9.3.11 There is the potential for development under Options 3, 4 and 5 to lead to negative effects on designated historic assets however, these impacts are less certain and could more easily be mitigated.

Housing (includes gypsies and travellers)

9.3.12 The delivery of housing provided by all options will lead to beneficial effects by helping to ease issues of affordability and through the direct provision of affordable housing.

9.3.13 Under Options 1, 2 and 4 the restricted number of sites may restrict the range and mix of housing that could be delivered. This is highlighted by a need within Hertford to shift from flatted development towards the promotion of dwellings more suited to family occupation.

9.3.14 However, Options 1 and 2 should have a positive impact in terms of meeting national PDL targets because they focus growth on brownfield. However, there are concerns over the viability of housing delivery according to Option 1 due to substantial land costs.

9.3.15 Although Options 3 (to the west) and 5 (to the south) have land availability that should deliver an appropriate housing mix, these options – in addition to Option 4 (to the west) – require greenfield landtake and are likely to have a negative impact in terms of meeting the national PDL targets.

9.3.16 It is unclear whether these options take in to account the need for gypsies and travellers sites and whether Hertford is a location under consideration for this.

Land (includes waste)

- 9.3.17 Options 3, 4 and 5 are likely to lead to negative effects against this topic because they require greenfield land to provide development. In the case of Option 3, this land use change requires utilising high quality agricultural land. Development in these areas could also potentially have an impact on major aquifers as they are within source protection zones.

Landscape

- 9.3.18 Options 3, 4 and 5 would require a Green Belt review and development according to 3 and 4 would lead to significant negative effects on views of landscape from within the wider area.

Transport

- 9.3.19 Options 1 and 2 would help to facilitate a shift towards more sustainable travel patterns however, existing problems associated with traffic congestion are also likely to be exasperated by additional levels of growth. Additionally, the limited availability of space within the town may cause difficulties reconciling the needs of road users and pedestrians, and placing development in these areas could exacerbate this problem.
- 9.3.20 Options 3, 4 and 5 suggest development outside of the existing urban area and are likely to increase through traffic in the town centre and generally exacerbate existing problems with congestion across the wider road network. Residents of these areas would also be required to travel greater distances to access rail stations in the town.
- 9.3.21 Option 5 would lead to development in an area with difficult access to the town centre by sustainable modes of transport due to specific road/route limitations.

Water

- 9.3.22 Water scarcity within the East of England means that any level of development will place additional pressure on water resources.
- 9.3.23 Option 1 and potentially Option 4 would lead to development within areas designated as 'inner groundwater source protection zones' which implies a greater risk of groundwater pollution.

9.4 Mitigation

- 9.4.1 From the appraisal of Options 1-5 for Hertford the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as sustainability considerations to guide the Council as they continue to develop their Core Strategy.

Table 22: Mitigation (Scott Wilson's recommendations)

Topic	Mitigation
Hertford-Ware Area	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion and minimise trip generation
Air quality	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion

	<ul style="list-style-type: none"> Development within areas experiencing poor air quality levels could be avoided
Biodiversity and green infrastructure	<ul style="list-style-type: none"> If development on greenfield land is required then a strategic assessment of greenfield biodiversity value could be undertaken, potentially drawing on available evidence sources (e.g. previous EIAs) Opportunities to integrate elements of existing green infrastructure should be maximised Direct impacts on sites with potentially high biodiversity value (e.g. Wildlife Sites, Open Spaces, and Registered Gardens) should be avoided
Climate change	<ul style="list-style-type: none"> Development which is able to maximise use of existing rail and bus services and can facilitate cycling and walking should be prioritised Demand management measures could be put in place that will minimise trip generation Areas of Flood Risk Zone 2 and 3 should be avoided
Community and wellbeing	<ul style="list-style-type: none"> Development should be avoided in areas which do not currently have, or would not reasonably lead to, good access to existing services and facilities
Historic environment	<ul style="list-style-type: none"> Development outside of the town centre and existing urban area should seek to avoid direct impacts on sites of historical environmental importance Strong safeguarding policies regarding impacts on Conservation Areas will be required if development is focused within the town centre
Housing	<ul style="list-style-type: none"> An appropriate mix of housing should be delivered so it may be necessary to mix growth options to ensure enough land is brought forward to support this objective
Land	<ul style="list-style-type: none"> An agricultural land survey could be undertaken to ensure that the lowest quality land is brought forward for development
Landscape	<ul style="list-style-type: none"> Impact on the views of the landscape should be avoided where possible A Green Belt should be undertaken prior to selection of areas for growth
Transport	<ul style="list-style-type: none"> Particularly strong demand management policies are required for development within the town centre to limit the use of cars per household in new build Demand management policies will be required to minimise congestion and trip generation The provision of sustainable transport infrastructure (i.e. bus routes, station upgrades, cycle and walking pathways) should be in place prior to the arrival of new residents Development in areas where access can be improved relatively easily should be prioritised Requirements for travel plans in new development should be set
Water	<ul style="list-style-type: none"> Strong policies are required to minimise water use and

	<p>maximise water efficiency</p> <ul style="list-style-type: none">• Development within inner source protection zones should be avoided if possible or steps taken to ensure that contamination of aquifers does not occur
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10 Appraisal of Options for Sawbridgeworth

10.1 Introduction

10.1.1 This section appraises the potential future growth options for the Sawbridgeworth town against the SA spatial areas and topics (the SA framework). East Herts has generated future development options and emerging visions for five different towns plus villages and an approach to development to the north of Harlow.

- Bishop's Stortford
- Buntingford
- Hertford
- **Sawbridgeworth**
- Ware
- Villages
- North of Harlow

10.1.2 Four potential growth options are identified in the Core Strategy Issues and Options consultation document:

- Option 1: Town Centre
- Option 2: To the Southwest
- Option 3: To the West
- Option 4: To the North

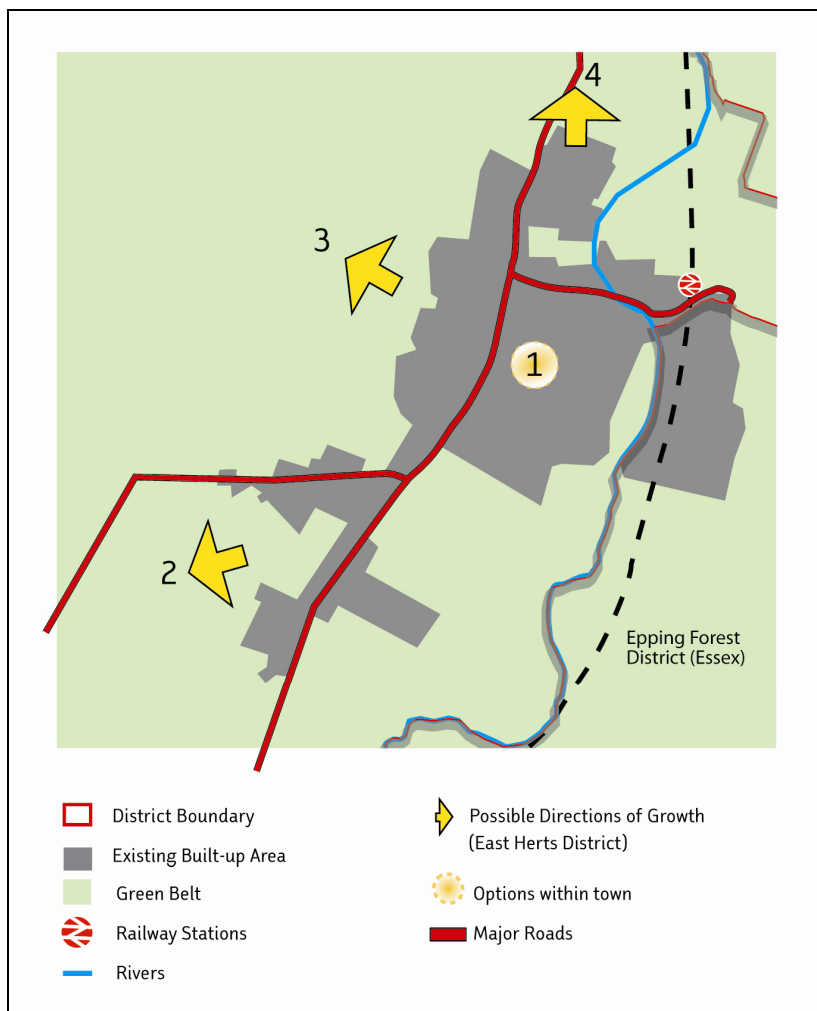
10.1.3 The growth options are illustrated in Figure 6 and are described in the box below, as taken from the Core Strategy Issues and Options consultation document.

Sawbridgeworth – growth options

To accommodate growth in and around Sawbridgeworth, four potential growth options have been identified. The purpose of these options is not to identify specific sites but rather to flag up potential issues such as infrastructure constraints that may shape how Sawbridgeworth grows to 2031. Please note that these options may not be mutually exclusive and that growth could occur in more than one direction, subject to the development strategy and distribution strategy we adopt. The growth options seek to deal with the 'to-find' figure of 8,876²⁷ and are therefore in addition to the development of any remaining Local Plan allocations. For the purpose of this diagram, potential growth to the north of Harlow is not included as this will be dealt with in more detail.

²⁷ Based on the revised draft RSS to 2031 a lower figure of 7,276 will be considered in the final version of the Issues and Options document. However, since the RSS to 2031 is still in draft format this is expressed as a range.

Figure 6: Growth Options for Sawbridgeworth to 2031 (indicative only)



10.2 Appraisal against Spatial Areas

- 10.2.1 This section sets out the appraisal of the growth options for Sawbridgeworth against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 23 summarises the significance of the expected impact.

Table 23: Appraisal of the Sawbridgeworth growth options against the SA framework spatial areas

Scoring key				
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)

Scoring for Spatial Areas				
	Option 1: Town Centre	Option 2: to the Southwest	Option 3: to the West	Option 4: to the North
M11 Stort Corridor	+ / -	+ / -	+ / -	+ / -

M11 Stort Corridor

- 10.2.2 All options are likely to lead to positive effects in terms of easing issues of affordability within the area (albeit to a relatively minor extent relative to need). Each option, to varying degrees is also likely to contribute towards higher levels of traffic congestion within the local road network.
- 10.2.3 Option 1 is likely to have positive effects in terms of increasing more sustainable modes of transport due to the proximity to Sawbridgeworth rail station and greater public bus provision. It should also help to ensure that development has good access to existing services and facilities.
- 10.2.4 Development outside the centre (under Options 2, 3 and 4) may result in more trips by car in to Sawbridgeworth in order to access key transport routes. These three options may all also result in coalescence which may have a negative overall impact on the M11 Stort Corridor spatial area.
- 10.2.5 It is uncertain whether a bypass to the west will go ahead and what impact it might have on development in this area under Option 4 and also under the other spatial options. It could enhance access between Sawbridgeworth and Bishop's Stortford and other commuting destinations (Stansted Airport, Harlow, London); however, there could be a negative impact on the village of High Wych.

10.3 Appraisal against Topic Areas

- 10.3.1 This section sets out the appraisal of the growth options for Sawbridgeworth against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 24 summarises the significance of the expected impact.

Table 24: Appraisal of the Sawbridgeworth growth options against the SA framework topic areas

Scoring key				
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)

Scoring for Topic Areas				
	Option 1: Town Centre	Option 2: to the Southwest	Option 3: to the West	Option 4: to the North
Air quality	+ / -	-	-	-
Biodiversity and green infrastructure	+	-	-	-
Climate change	+ / -	-	-	-
Community and wellbeing	0	0	0	0
Economy and employment	0	0	0	0
Historic environment	-	?	0	0
Housing	+ / ?	+ / -	+ / -	+ / -
Land	+	-	-	-
Landscape	+	-	-	-
Transport	+ / -	-	-	-
Water	-	-	-	-

Air quality

- 10.3.2 Under Option 1 the concentration of development in the town centre is likely to have a negative impact against this topic where congestion is a particular problem and the A1184 passes through this area between Harlow and Bishop's Stortford. However, Option 1 is a central area considered to have good accessibility that would therefore place development in close proximity to the railway station and existing facilities and services, and bus routes connect the town with major commuting destinations of Harlow and Bishop's Stortford, reducing the need to travel and encouraging lower levels of car use. Yet it needs to be noted that high speed trains do not stop at Sawbridgeworth, that there is limited capacity on the line and limited cycle routes – if this is not addressed this could lead to a reliance on cars as a primary form of transport. In addition, no bus routes serve the nearby industrial areas and this would likely increase reliance on car travel from development in the centre.
- 10.3.3 Options 2, 3 and 4 are also likely to lead to increased congestion in the centre and increased car reliance in order to access Harlow and Bishop's Stortford and services and facilities in the centre. No bus routes serve the station or nearby industrial areas.

Biodiversity and green infrastructure

- 10.3.4 Delivering growth in the town centre (Option 1) would concentrate development on brownfield land and should therefore protect biodiversity and green infrastructure assets to a greater extent than the other options. However, it is important to note that brownfield land can have

substantial biodiversity value that could be lost. In addition, the opportunity to develop, increase and enhance the green infrastructure (visual appeal, open space, green transport corridors, biodiversity etc) of the town centre could be lost by utilising all brownfield land purely for housing.

- 10.3.5 By delivering growth on greenfield land, Options 2, 3 and 4 are likely to have a negative impact on the District's biodiversity. Particular assets that could be impacted by development include, to the west (Option 3), sensitive wildlife sites, and Rivers Nursery and Orchard, to the south west (Option 2), sensitive wildlife sites and high quality natural environment, and to the north (Option 4) designated open spaces.

Climate change (mitigation and adaptation) (includes flood risk)

- 10.3.6 All options suggest higher levels of development within Sawbridgeworth and are likely to result in increased greenhouse gas emissions, particularly from transport.
- 10.3.7 Locating development in the town centre (Option 1) in close proximity to existing services and facilities should decrease the need to travel and thus should reduce emissions from transport.
- 10.3.8 Options 2, 3 and 4 are likely to increase congestion and encourage higher levels of private transport usage.
- 10.3.9 In light of the town's location adjacent to the River Stort and the path of Sawbridgeworth Brook through the centre, the town centre includes areas in the Flood Zone which would compromise development under growth Option 1. Options 2, 3 and 4 would lead to development away from the flood plain and areas of higher flood risk.

Historic environment

- 10.3.10 The town of Sawbridgeworth retains much of its historic character and there is a Conservation Area in the centre and numerous listed buildings. It is therefore likely that Option 1, locating development in the town centre, will have a significant negative impact on the historic environment.
- 10.3.11 Option 2 may impact upon a listed building in this area, but may also have an indirect impact (e.g. increased traffic, visitor pressure etc) on the Registered Park and Garden to the south of Sawbridgeworth, in addition to other listed buildings.

Housing (includes gypsies and travellers)

- 10.3.12 The delivery of housing provided by all options will lead to beneficial effects by helping to ease issues of affordability and through the direct provision of affordable housing. However, there are concerns over the viability of housing delivery according to Option 1 due to substantial land costs. It would however, lead to positive impacts in terms of meeting national PDL targets because it focuses growth on brownfield and in remediating contaminated land.
- 10.3.13 Options 2, 3 and 4 would provide sufficient land to deliver an appropriate housing mix, however, all three could lead to greenfield land take. Options 2 and 4 are remote from existing services and facilities within Sawbridgeworth however, these needs may be met in adjacent towns.

Land (includes waste)

- 10.3.14 Option 1 is likely to have a positive impact against the land topic by maximising use of brownfield land and minimising the potential expansions of the town beyond its boundaries.
- 10.3.15 Options 2, 3 and 4 are likely to have a negative impact against this topic by utilising greenfield land and – particularly in the case of Options 3 and 4 – potentially high quality agricultural land.

Landscape

- 10.3.16 Options 2, 3 and 4 would require a Green Belt Review and greenfield landtake. There is also concern that these options could also result in coalescence with neighbouring settlements. This would lead to negative impacts on the landscape and village/town settings.

Transport

- 10.3.17 The current issue of road congestion in the centre of Sawbridgeworth is likely to be exacerbated by any growth.
- 10.3.18 Option 1 is likely to exacerbate congestion and compound the tension between the needs of vehicles and pedestrians in the compact and constrained town centre. Whilst proximity to existing public transport services could encourage a shift towards more sustainable transport patterns, the poor levels of rail service and high car ownership may also increase reliance on private car use.
- 10.3.19 Options 2, 3 and 4 are all likely to exacerbate road congestion in the town centre as residents seek to access facilities and services, the A1184, the train station, and other town centre uses. They are also likely to result in a higher level of car reliance and unsustainable forms of transport.

Water

- 10.3.20 Water scarcity within the East of England means that any level of development will place additional pressure on water resources.
- 10.3.21 Options 2 and 3 may lead to development within an outer groundwater protection zone and could pose a greater risk of groundwater pollution.

10.4 Mitigation

- 10.4.1 From the appraisal of Options 1-4 for Sawbridgeworth the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as provide sustainability considerations to guide the Council as they continue to develop their Core Strategy.

Table 25: Mitigation (Scott Wilson's recommendations)

Topic	Mitigation Recommendations
M11 Stort Corridor	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion and minimise trip generation Potential impacts on the integrity of the Stort Valley must be considered
Air Quality	<ul style="list-style-type: none"> Demand management may be required to ensure that air quality is not

	<ul style="list-style-type: none"> degraded Areas with poor existing services and facilities and with poor potential for walking and cycling routes should be avoided
Biodiversity and Green Infrastructure	<ul style="list-style-type: none"> A Green Belt review should be undertaken prior to approval of development Opportunities to integrate elements of existing green infrastructure should be maximised Direct impacts on sites with potentially high biodiversity value (e.g. Wildlife Sites, Open Spaces, and Registered Gardens) should be avoided If development on greenfield land is required then a strategic assessment of greenfield biodiversity value could be undertaken, potentially drawing on available evidence sources (e.g. previous EIAs)
Climate Change	<ul style="list-style-type: none"> Measures are likely to be required which minimise the risk of fluvial and surface water flooding for development in the town centre Options which will minimise traffic growth could be prioritised for delivery Demand management measures could be put in place that will minimise trip generation
Historic Environment	<ul style="list-style-type: none"> Strong safeguarding policies regarding impacts on Conservation Areas will be required if development is focused within the town centre Develop which may lead to direct negative effects on the Registered Parks and Gardens in the area should be avoided
Land	<ul style="list-style-type: none"> An agricultural land survey could be undertaken to ensure that the lowest quality land is brought forward for development
Landscape	<ul style="list-style-type: none"> Coalescence between Sawbridgeworth and surrounding settlements should be avoided A Green Belt review should be undertaken prior to approval of development
Transport	<ul style="list-style-type: none"> Demand management policies will be required to minimise congestion and trip generation The provision of sustainable transport infrastructure (i.e. bus routes, station upgrades, cycle and walking pathways) should be in place prior to the arrival of new residents Requirements for travel plans in new development should be set
Water	<ul style="list-style-type: none"> Strong policies are required to minimise water use and maximise water efficiency Development within groundwater protection zones should be avoided

11 Appraisal of Options for Ware

11.1 Introduction

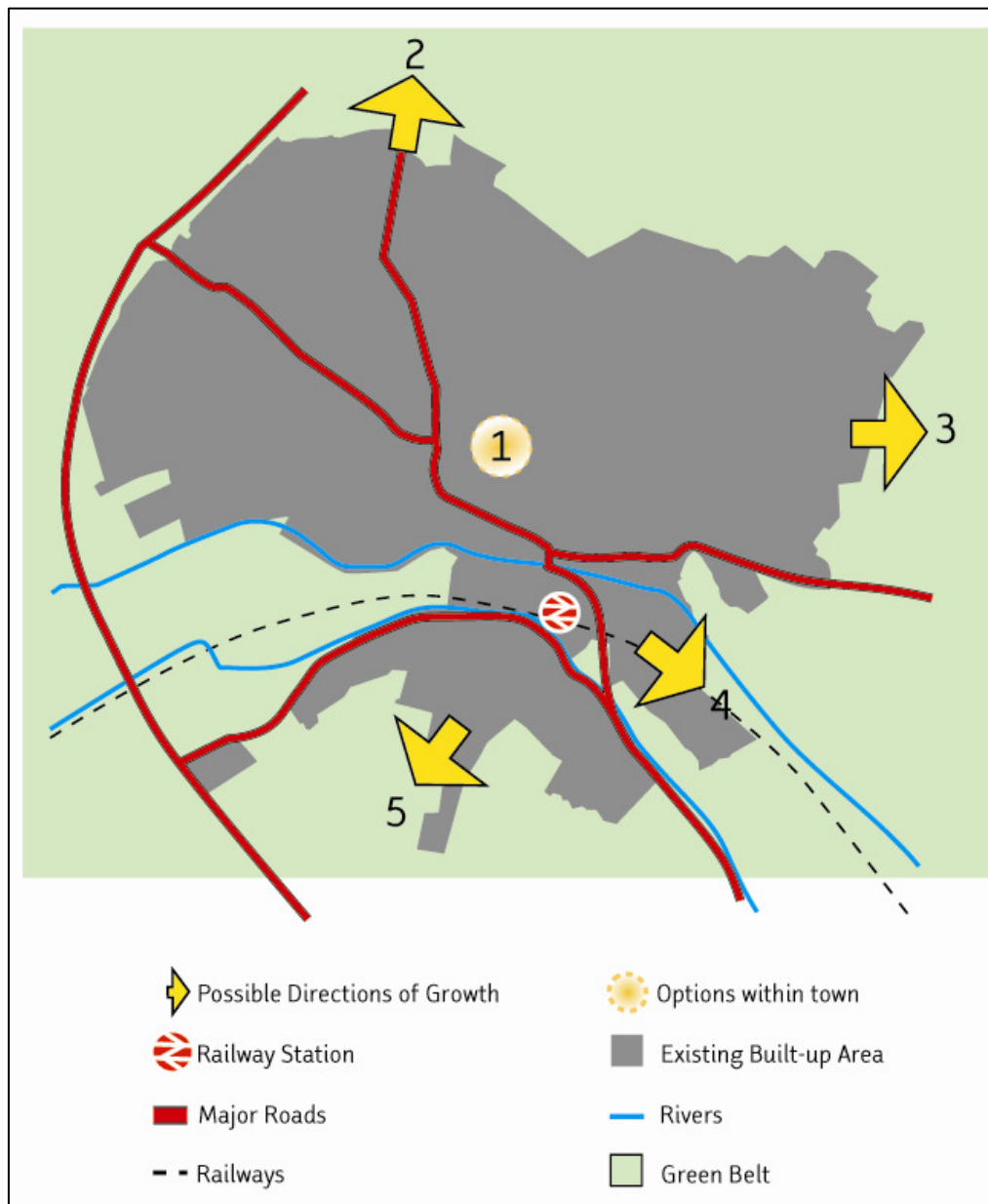
- 11.1.1 This section appraises the potential future growth options for the Ware town against the SA spatial areas and topics (the SA framework). East Herts has generated future development options and emerging visions for five different towns plus villages and an approach to development to the north of Harlow.
- Bishop's Stortford
 - Buntingford
 - Hertford
 - Sawbridgeworth
 - **Ware**
 - Villages
 - North of Harlow
- 11.1.2 Five potential growth options are identified in the Core Strategy Issues and Options consultation document:
- Option 1: Town Centre / Existing Urban Area
 - Option 2: To the North
 - Option 3: To the East
 - Option 4: To the Southeast
 - Option 5: To the Southwest
- 11.1.3 The growth options are illustrated in Figure 7 and are described in the box below, as taken from the Core Strategy Issues and Options consultation document.

Ware – growth options

To accommodate growth in and around Ware, five potential growth options have been identified. The purpose of this map is not to identify specific sites but rather to identify potential issues, such as infrastructure constraints, that may have an influence on decisions for the growth of Ware to 2031. The outcome of the finally adopted District-wide development strategy could mean that that growth may occur in more than one direction. The growth options seek to deal with the 'to-find' figure of 8,876²⁸ and are therefore in addition to the development of any remaining Local Plan allocations. As such, these sites have not been shown.

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Figure 7: Growth Options for Ware to 2031 (indicative only)



11.2 Appraisal against Spatial Areas

11.2.1 This section sets out the appraisal of the growth options for Ware against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 26 summarises the significance of the expected impact.

Table 26: Appraisal of the Ware growth options against the SA framework spatial areas

Scoring key					
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)	

Scoring for Spatial Areas					
	Growth Option 1: Town Centre / Existing Urban Area	Growth Option 2: To the North	Growth Option 3: To the East	Growth Option 4: To the South East	Growth Option 5: To the South West
Hertford-Ware Area	+	+ / -	+ / -	+ / -	+ / -

Hertford-Ware Area

- 11.2.2 All options will likely help to address issues of affordability that are experienced within Ware and the surrounding area.
- 11.2.3 Option 1 will likely lead to positive effects for this area through the concentration of development in areas with good access to public transport services and in close proximity to existing facilities in services. Impacts on congestion are not considered significant if the scale of development is appropriate to the town's current size.
- 11.2.4 Options 2, 3, 4 and 5 are likely to encourage greater trip generation to access services and facilities as well as for commuting. It is less likely that a shift towards sustainable modes of transport will be encouraged through these options although greater potential is presented by Option 2 in light of the better access to bus services and to existing services and facilities.

11.3 Appraisal against Topic Areas

- 11.3.1 This section sets out the appraisal of the growth options for Ware against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 27 below summarises the significance of the expected impact.

Table 27: Appraisal of the Ware growth options against the SA framework topic areas

Scoring key					
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)	
Scoring for Topic Areas					
	Growth Option 1: Town Centre / Existing Urban Area	Growth Option 2: To the North	Growth Option 3: To the East	Growth Option 4: To the South East	Growth Option 5: To the South West
Air quality	-	-	-	-	-
Biodiversity and green infrastructure	- / ?	-	-	-	-
Climate change	+	-	-	-	-
Community and wellbeing	+	+	+	-	-
Economy and employment	+	- / ?	- / ?	+	+
Historic environment	-	-	0	0	0
Housing	+ / -	+ / -	+ / -	+ / -	+ / -
Land	+	-	-	-	-
Landscape	+	-	-	-	-
Transport	+ / -	+ / -	- / ?	- / ?	- / ?
Water	-	-	-	-	-

Air quality

- 11.3.2 Peak time congestion on the road infrastructure of Ware is a major issue and likely to be exacerbated by any growth. This is particularly true for the town centre and its approach roads, thus Option 1 is likely to have a negative impact on air quality. However, the proximity of the train station could be used to an advantage.
- 11.3.3 Options 2, 3, 4 and 5 locate development outside the centre and are likely to make less of a contribution towards congestion; however, they will lead to additional traffic into the centre for employment sites, key facilities and services and the rail station, particularly if the development delivered under these options inadequately addresses demand.
- 11.3.4 In light of the high existing levels of out and in commuting, provision of development according to Options 3 and 4 may exacerbate poor air quality in the centre by increasing through traffic towards Hertford.
- 11.3.5 Option 5 provides for development on land which has poor pedestrian access to the town centre and therefore might increase reliance on motorised transport, exacerbating congestion and issues of air quality.

Biodiversity and green infrastructure

- 11.3.6 Higher levels of growth are likely to have negative impacts on biodiversity and may result in the loss of green infrastructure assets. However, opportunities are also presented for enhancing and integrating green infrastructure through development design.
- 11.3.7 Under Option 1 the delivery of growth in the town centre and within the existing urban area would concentrate development on brownfield land and should therefore protect biodiversity and green infrastructure assets to a greater extent than the other options. However, it must be noted that brownfield land can also provide important habitats for biodiversity.
- 11.3.8 Options 2, 3, 4 and 5 are likely to have a negative impact on the District's biodiversity and green infrastructure assets. Particular assets that could be impacted by development include, to the north (Option 2) two Registered Gardens, to the east (Option 3) Open Spaces and Wildlife Sites, to the south east (Option 4) Lee Valley National Park and Wildlife Sites, to the south west (Options 5) Open Spaces.

Climate change (mitigation and adaptation) (includes flood risk)

- 11.3.9 Any growth is likely to lead to an increase in greenhouse gas emissions however development can be designed and built 'sustainably' (e.g. to increase energy efficiency, promote water neutrality, mitigate flood risk, encourage sustainable transport and reduce car reliance etc).
- 11.3.10 Options 2, 3, 4 and 5 could lead to increased congestion and reliance on unsustainable forms of transport.
- 11.3.11 Options 1 and 4 may lead to development within areas of flood risk.

Community and wellbeing

- 11.3.12 Option 5, although there would be close proximity to existing schools, will likely lead to negative effects against community and wellbeing as a result of reducing existing recreational provision and poor pedestrian access to the town centre.

Economy and employment

- 11.3.13 Under Options 2 and 3 there is potential for negative effects to be experienced by elements of the rural economy in light of the loss of agricultural land.

Historic environment

- 11.3.14 The medieval heritage of Ware means that it has a number of historic environment constraints including a large Conservation Area and many listed buildings. Under Option 1 development in the centre and within existing urban areas could lead to significant negative effects against this SA topic. In addition, all other spatial options may lead to minor indirect impacts on these central historical assets e.g. due to the increased number of trips in to the centre that they are likely to generate.
- 11.3.15 Option 2 may lead to negative direct effects on the Registered Parks and Gardens in this area.

Housing (includes gypsies and travellers)

- 11.3.16 The delivery of housing will lead to beneficial effects in terms of the provision of affordable housing and helping to ease concerns over affordability.
- 11.3.17 Options 2, 3, 4 and 5 would require development on greenfield land and would therefore not contribute towards national PDL targets.
- 11.3.18 Options 1 and 4 may lead to negative effects because the town centre location (Option 1) and the limited amount of land available for development (Option 4) may present difficulties in delivering a balanced mix of dwellings types, particularly new homes suited to family occupation.
- 11.3.19 It is unclear whether these options take in to account the need for gypsies and travellers sites and whether Ware is a location under consideration for this.

Land (includes waste)

- 11.3.20 Options 2, 3, 4 and 5 are likely to have a negative impact against this topic because they would require greenfield land and – particularly in the case of Option 3 – potentially high quality agricultural land. Development in these areas could also potentially have an impact on major aquifers as they are within source protection zones.

Landscape

- 11.3.21 Options 2, 3, 4 and 5 would all require a Green Belt Review given their location on Green Belt land (respectively) to the north, east, south east and south west. Option 2 could reduce the gap between Ware and Thundridge. Option 3 could reduce the gap between Ware and Wareside. Option 4 could lead to coalescence with Great Amwell and Stanstead Abbots and Option 5 between Hertford, Hertford Heath and Great Amwell.

Transport

- 11.3.22 Option 1 (and to a certain extent Option 2) will help facilitate an increase in more sustainable travel patterns due to its proximity to existing rail and public bus services however, the limited availability of space within the town may cause difficulties reconciling the needs of road users and pedestrians, and placing development in these areas could exacerbate this problem as well as congestion.
- 11.3.23 Options 2, 3, 4 and 5 will likely increase traffic flows into the town centre and generally exacerbate existing problems with congestion. Option 5 in particular suggests development in a location with poor relative access to the town centre by pedestrians due to road/route limitations.

Water

- 11.3.24 Water scarcity within the East of England means that any level of development will place additional pressure on water resources.

11.4 Mitigation

11.4.1 From the appraisal of Options 1-5 for Ware the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of current options as well as provide sustainability considerations to guide the Council as they continue to develop their Core Strategy.

Table 28: Mitigation (Scott Wilson's recommendations)

Topic	Mitigation Recommendations
Hertford-Ware Area	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion and minimise trip generation
Air Quality	<ul style="list-style-type: none"> Demand management may be required to ensure that air quality is not degraded Areas with poor existing services and facilities and with poor potential for walking and cycling routes should be avoided
Biodiversity and Green Infrastructure	<ul style="list-style-type: none"> A Green Belt review should be undertaken prior to approval of development Opportunities to integrate elements of existing green infrastructure should be maximised Direct impacts on sites with potentially high biodiversity value (e.g. Wildlife Sites, Open Spaces, and Registered Gardens) should be avoided – a strategic assessment of greenfield biodiversity value could be undertaken, potentially drawing on available evidence sources (e.g. previous EIAs)
Climate Change	<ul style="list-style-type: none"> Measures are likely to be required which minimise the risk of fluvial and surface water flooding for development, particularly with respect to Options 1 and 4 Options which will minimise traffic growth could be prioritised for delivery Demand management measures could be put in place that will minimise trip generation
Community Wellbeing	<ul style="list-style-type: none"> Development should be avoided in the areas which do not currently have, or would not reasonably lead to, good access to existing services and facilities Levels of recreational provision should not be reduced by new development
Economy and Employment	<ul style="list-style-type: none"> The use of agricultural land for housing development should be avoided if possible
Historic Environment	<ul style="list-style-type: none"> Strong safeguarding policies regarding impacts on Conservation Areas will be required if development is focused within the town centre Develop which may lead to direct negative effects on the Registered Parks and Gardens in the area should be avoided
Land	<ul style="list-style-type: none"> A Green Belt review should be undertaken prior to approval of development An agricultural land survey could be undertaken to ensure that the lowest quality land is brought forward for development
Landscape	<ul style="list-style-type: none"> Coalescence between Ware and surrounding settlements should be avoided
Transport	<ul style="list-style-type: none"> Demand management policies will be required to minimise congestion and trip generation The provision of sustainable transport infrastructure (i.e. bus routes, station upgrades, cycle and walking pathways) should be in place prior to the arrival of new residents Requirements for travel plans in new development should be set
Water	<ul style="list-style-type: none"> Strong policies are required to minimise water use and maximise water efficiency Development within groundwater protection zones should be avoided

12 Appraisal of Options for Villages

- 12.1.1 This section discusses the appraisal of the potential future growth options for the Villages against the SA spatial areas and topics (the SA framework). East Herts has generated future development options and emerging visions for five different towns plus villages and an approach to development to the north of Harlow.
- Bishop's Stortford
 - Buntingford
 - Hertford
 - Sawbridgeworth
 - Ware
 - **Villages**
 - North of Harlow
- 12.1.2 The Core Strategy Issues and Options proposes six District wide development strategy options for accommodating growth to 2031. These are:
- Option A: Towns
 - Option B: Towns and Larger Service Villages
 - Option C: Towns, Larger Service Villages, and Smaller Service Villages
 - Option D: Towns, Larger Service Villages, Smaller Service Villages, and Other Villages / Hamlets
 - Option E: Towns, Stevenage and Welwyn Garden City
 - Option F: Settlements within Transport Corridors
- 12.1.3 Options B, C, D and F direct growth towards villages. The appraisal of these development strategy options, including their impacts on rural areas, has been undertaken and the findings presented in Chapter 6 of this report. The reader should refer to this chapter for information regarding the effects of these options on villages.
- Further Considerations**
- 12.1.4 In developing the East Herts Core Strategy, there are several key areas of concern which apply specifically to rural areas that will need to be considered. These are discussed below.
- 12.1.5 Growth in small rural communities is often resisted because of the impact it can have on the environmental character and distinctness of the settlement. Whilst there are strong reasons in terms of sustainability for allocating the majority of housing within the district's key towns (e.g. to promote sustainable transport, increase access to services and facilities, etc), the Matthew Taylor Review on Rural Economy and Affordable Housing²⁹ points out that high levels of growth in market towns can detract from the economic and social vitality of smaller nearby

²⁹ CLG (2008). *Matthew Taylor Review on Rural Economy and Affordable Housing* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyimplementation/reformplanningsystem/matthewtaylorreview/> (accessed 15 April 2010).

settlements by making them reliant on these places for the services that tend to be located here. This subsequently reduces the self-containment of these smaller settlements. This tension should be reflected in the Core Strategy which must allow some levels of economic development in smaller rural settlements but justification for such development will need to be stricter.

12.1.6 Furthermore, if villages are to retain their vitality, then the planning policy context should not serve to stifle the development of rural businesses. This refers to a need to consider whether planning policies developed at subsequent stages of the Core Strategy allow for the development of all forms of businesses and are not overly rigid and would thereby encourage small rural businesses to move out of the countryside into urban areas as soon as they start to grow. Additionally, the Council should ask itself whether planning policies support a flexible approach to work-based extensions. The purpose of this flexibility would be to encourage home-based working and for these new business to be able to take on employees.

12.1.7 Whilst housing need, particularly in rural areas, is a pressing issue for East Herts the picture is complicated because, as the Issues and Options recognises, villages have primarily become dormitory or commuter villages. This raises questions over the specific types of affordable accommodation that can and should be provided in these areas. Should affordable housing be provided for the ageing population and younger people who largely access employment and services outside the village, or should there be specific policy measures developed which closely aligns affordable housing in villages with the needs of local businesses?. For example, through the provision of more affordable housing which caters specifically to seasonal employment or is linked to specific agricultural activities. As the Taylor Review states:

If we fail to build the affordable homes to enable the people who work in the countryside to live there we risk turning our villages in terms of gated communities of wealthy commuters and the retired. In many cases just a handful of well designed homes, kept affordable in perpetuity for local people, will make all the difference to the sustainability of a village and its services.

12.1.8 Another difficult issue for rural areas is access to satisfactory levels of public transport. Whilst it is recognised that the provision of this is largely outside the power of the local council, in permitting development across the district it does have a role to play. In light of this it is recognised that spatial development options which allow for the wide dispersal of new housing will lead to poorer overall accessibility. This importance of this issue is increased in light of the ageing population structure across the rural parts of East Herts and levels of disability. These issues are discussed in the Equality and Diversity Commentary.

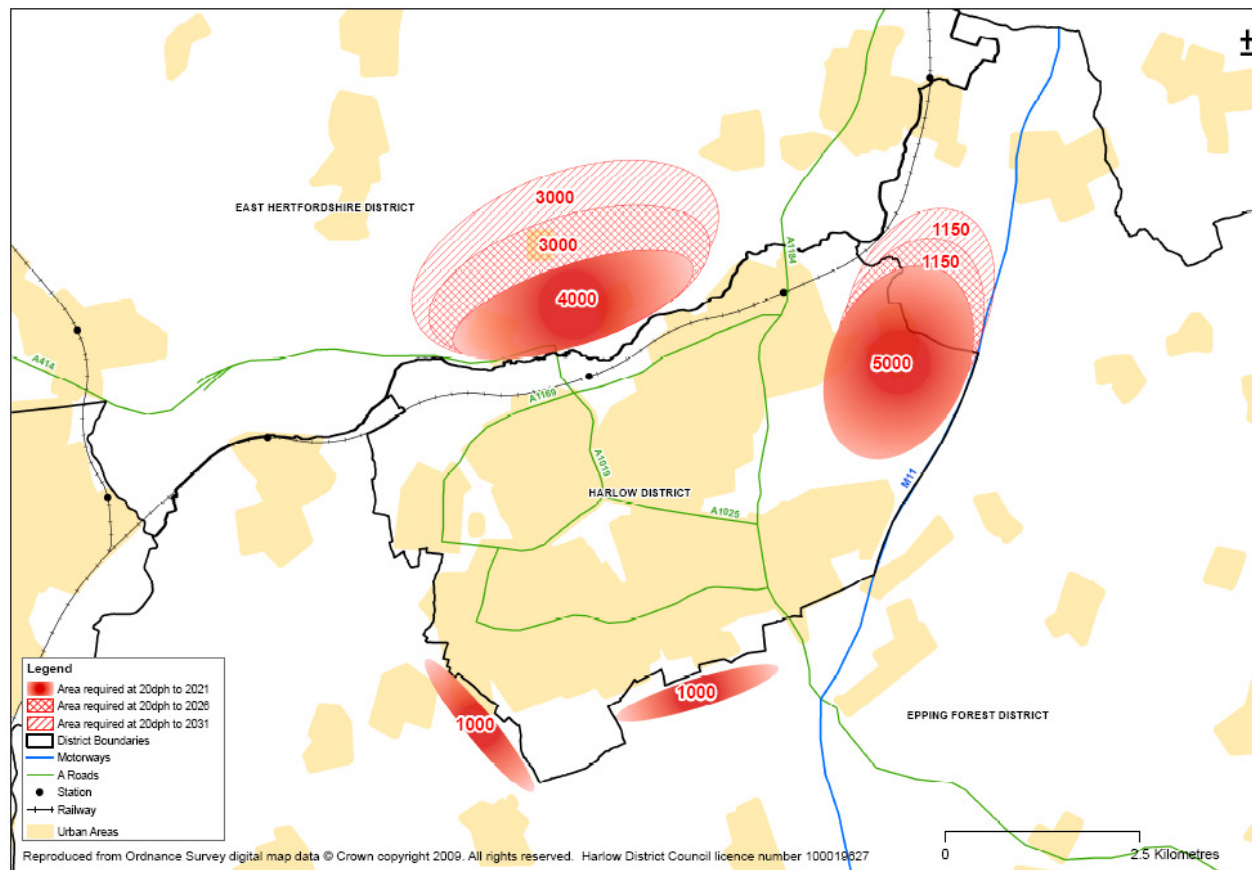
12.1.9 It should also be noted that not all development in rural areas can be accessed by public transport and therefore, the Council may wish to provide some flexibility in determining planning applications in areas that are not well served. This flexibility would help to remove barriers to rural economic development, including the re-use of disused farms or farm buildings. However, this is not to suggest that access to sustainable transport should not be an important consideration and recognition needs to be given to Policy EC12 of PPS4 which supports economic development away from rural centres if it is the most sustainable location.

13 Appraisal of Options for the North of Harlow

13.1 Introduction

- 13.1.1 This section appraises the potential future growth options for development North of Harlow against the SA spatial areas and topics (the SA framework). East Herts has generated future development options and emerging visions for five different towns plus villages and an approach to development to the north of Harlow.
- Bishop's Stortford
 - Buntingford
 - Hertford
 - Sawbridgeworth
 - Ware
 - Villages
 - **North of Harlow**
- 13.1.2 Following the requirement of Policy HA1 of the East of England Plan a study of the appraisal of planning and transport options was undertaken by East Herts, Harlow and Epping Forest District Councils. The purpose of this study was to determine the appropriate distribution between the urban extensions, including the more detailed location and scale of required development. The results of the study form an important part of the evidence base informing the preparation of the co-ordinated LDDs prepared by the three District Councils.
- 13.1.3 As part of this technical study the Consultants developed five spatial options based on the requirements of Policy HA1 and a range of local characteristics. A further option based on constraints (flooding, landscape, and Green Belt) was discounted on the basis that it offered no directional guidance. These options were entitled:
- Option A: RSS: Northern-led
 - Option B: Policy-led 2
 - Option C: Combined criteria-led
 - Option D: Regeneration-led
 - Option E: Sustainable transport-led
- 13.1.4 These options underwent a systematic appraisal of their reasonableness (essentially a series of questions asking if they could be delivered) and their relative and overall sustainability. The study can be found at www.eastherts.gov.uk/harlowarea. The results of this appraisal process allowed the consultants to refine the options into a suggested approach which is shown in Figure 8. It is this option that has been appraised and the findings documented within this SA Report.

Figure 8: Growth Options for North of Harlow to 2031 (indicative only)



13.2 Appraisal against Spatial Areas

- 13.2.1 This section sets out the appraisal of the Consultants' suggested approach for development north of Harlow against the spatial areas of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 29 summarises the significance of the expected impact.

Table 29: Appraisal of the North of Harlow growth options against the SA framework spatial areas

Scoring key				
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)

Scoring for Spatial Areas	
	Suggested Approach
Hertford-Ware Area	+ / -
M11 Stort Corridor	+ / -
Rural Area	-
North of Harlow	+ / -

Hertford-Ware Area

- 13.2.2 Large scale development to the north of Harlow will likely provide increased opportunities for sustainable transport by bringing forward greater demand for intercity bus routes and potential improvements to the rail network. There is however, significant concern that high levels of growth will also lead to increased congestion within the Hertford-Ware area.

M11 Stort Corridor

- 13.2.3 Large scale development to the north of Harlow will likely provide increased opportunities for sustainable transport by bringing forward greater demand for intercity bus routes and potential improvements to the rail network. There is however, significant concern that high levels of growth will also lead to increased congestion within the M11 Stort Corridor and could also place pressure on the integrity of the River Stort. There are however, significant opportunities to help improve housing affordability and to link/integrate green infrastructure within development in this area.

- 13.2.4 There is also concern that large scale development could lead to coalescence with Sawbridgeworth and High Wych as well as potentially significant negative effects on historic character including on the conservation areas in these settlements.

Rural Area

- 13.2.5 Large scale growth to the north of Harlow will have significant and permanent negative effects on the character of this rural landscape and the distinctiveness and character of the individual villages.

North of Harlow

- 13.2.6 The key sustainability issues for the North of Harlow bring to light the significant trade-offs that must be made in bringing forward development of the scale proposed. Positive effects are likely to arise in terms of increasing sustainable modes of transport and delivery of affordable housing. However, in the area to the north of Harlow significant and permanent negative effects are likely to be experienced for biodiversity, landscape character, impacts on local and nearby strategic infrastructure. In addition, the scale of development is likely to lead to significant negative effects on the character of settlements such as Gilston, Eastwick and Hunsdon. There will also be a need to ensure that the development does not harm the integrity of the River Stort and the Stort Valley.

13.3 Appraisal against Topic Areas

- 13.3.1 This section sets out the appraisal of the Consultants' suggested approach for development north of Harlow against the topics of the SA framework, focusing in particular on any uncertainties, potential negatives and highlighting any ways to enhance or to clarify certainty of impacts. Table 30 below summarises the significance of the expected impact.

Table 30: Appraisal of the North of Harlow growth options against the SA framework topic areas

Scoring key				
Significant beneficial effect (+)	No significant effect (0)	Uncertain effect (?)	Positive & negative effects (+ / -)	Significant negative effect (-)

Scoring for Topic Areas	
	Suggested Approach
Air quality	-
Biodiversity and green infrastructure	-
Climate change	-
Community and wellbeing	-
Economy and employment	+
Historic environment	-
Housing	+
Land	+ / -
Landscape	-
Transport	-
Water	-

Air quality

- 13.3.2 There is the potential for significant temporary short-term effects to air quality as a result of construction and related activities during the development of new housing and associated infrastructure. High levels of development may also lead to decreased air quality within the

immediate area as well as within surrounding settlements such as Ware, Hertford, Bishop's Stortford and Harlow.

Biodiversity and green infrastructure

- 13.3.3 Whilst the large scale of development to the North of Harlow will present significant opportunities to integrate multi-functional greenspaces within East Herts and Harlow, there is also likely to be permanent damage to biodiversity within the immediate area. The Stort Valley and Ash Valley are both Key Biodiversity Areas (KBA) and therefore require significant attention to ensure that it is not harmed.

Climate change (mitigation and adaptation) (includes flood risk)

- 13.3.4 High levels of development are likely to lead to increasing greenhouse gas emissions from transport, particularly in the short to medium term. Short-term, temporary emissions are also likely to emerge through construction-related activities. There are uncertainties over the impact of large scale development on surface water flooding and an appropriate Flood Risk Assessment (FRA) will be required (in line with PPS25) as set out by the Strategic Flood Risk Assessment (SFRA).

Community and wellbeing

- 13.3.5 There are particular concerns that the large scale of development will lead to the coalescence of the urban extension to Harlow and neighbouring settlements. Where possible, the location of the urban extension should be mindful of the need to avoid coalescence.

Economy and employment

- 13.3.6 It is likely that significant temporary employment opportunities will be provided by the large scale of development, particularly within construction and related service and support industries. The regeneration of Harlow and its greater critical mass should also lead to greater number and variety of employment opportunities within the area.

Historic environment

- 13.3.7 High levels of development will likely lead to significant permanent negative effects against known and unknown elements of the historic environment to the north of Harlow. This includes listed buildings, SAMS in the immediate area as well as Registered Parks and Gardens to the east and west, and Conservation Areas to the north, east and west.

Housing (includes gypsies and travellers)

- 13.3.8 Whilst all housing is likely to be located on green field and Green Belt land, there are significant opportunities to provide a large amount of affordable housing, to meet the needs of an aging and disabled population and to help address issues of housing affordability.

Land (includes waste)

- 13.3.9 This option could lead to potential negative effects on the aquifers beneath East Herts because a large part of the potential development is within an outer Source Protection Zone. Positive effects may be experienced due to opportunities to improve recycling rates and bring forward innovative processing technologies such as waste-to-energy.

Landscape

- 13.3.10 The large scale of development will lead to significant permanent negative effects on the District's landscape character.

Transport

- 13.3.11 Whilst the scale of development is likely to present opportunities to increase use of sustainable modes of transport, present trends suggest that high levels of car use are likely and that the option will lead to increased congestion on both the local road network as well as the strategic road network, particularly the M11.

Water

- 13.3.12 The East of England is an area of water scarcity so greater levels of development will place additional pressure on water resources.

13.4 Mitigation

13.4.1 From the appraisal of the Consultants' suggested approach for development north of Harlow the following table includes our mitigation recommendations. These are recommendations for the Council that may help to improve the sustainability of the current option as well as provide sustainability considerations to guide the Council as they continue to develop their Core Strategy.

Table 31: Mitigation (Scott Wilson's recommendations)

Topic	Mitigation Recommendations
Hertford-Ware Area	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion and minimise trip generation Improvements to public transport systems including rail station upgrades and the provision of new bus services should be put in place prior to residents moving in to ensure that good travel habits are formed Development should allow for easy access to existing rail stations in Harlow and facilitate an integrated bus service
M11 Stort Corridor	<ul style="list-style-type: none"> Development within this area may require demand management measures to discourage additional congestion and minimise trip generation Improvements to public transport systems including rail station upgrades and the provision of new bus services should be put in place prior to residents moving in to ensure that good travel habits are formed
Rural Area	<ul style="list-style-type: none"> There is very little in terms of mitigating the negative effects of this option on the rural area that can be recommended
North of Harlow	<ul style="list-style-type: none"> There is very little in terms of mitigating the negative effects of this option on the landscape to the north of Harlow that can be recommended. To minimise the negative effects against the range of other effects high development standards must be applied as appropriate with regard to transport, housing, green space and green infrastructure, and biodiversity. These are discussed in the relevant topic areas below.
Air Quality	<ul style="list-style-type: none"> Appropriate controls must be put in place to ensure that air quality within the immediate area is not negatively affected during the construction of the new development and its associated infrastructure. Demand management policies will likely be required to minimise car use and trips to and from the new development.
Biodiversity and Green Infrastructure	<ul style="list-style-type: none"> A Green Belt review should be undertaken prior to approval of development Opportunities to integrate elements of existing green infrastructure should be maximised and the unique hedgerows within the area should be protected and integrated into any new development Development should not occur within the Stort Valley KBA unless supported by a particularly strong argument for it
Climate Change	<ul style="list-style-type: none"> Measures will be required to minimise the risk of fluvial and surface water flooding from the new development and an appropriate FRA undertaken The highest CSH standards for residential and commercial development should be applied in new development Opportunities to maximise renewable and decentralised energy production should be incorporated within the development
Community and Wellbeing	<ul style="list-style-type: none"> Coalescence between development to the north of Harlow and existing settlements should be avoided where possible
Historic Environment	<ul style="list-style-type: none"> Strong safeguarding policies regarding impacts on Conservation Areas and SAMs will be required

Land	<ul style="list-style-type: none"> • A Green Belt review should be undertaken prior to approval of development • Waste-to-energy opportunities could also be explored
Landscape	<ul style="list-style-type: none"> • There is very little that can be suggested in terms of minimising the significant negative effects that are likely to occur from this development option on landscape character. • Safeguarding policies are expected to be included within the Core Strategy however, the minimisation of effects will be relatively insignificant.
Transport	<ul style="list-style-type: none"> • Improvements to public transport systems including rail station upgrades and the provision of new bus services should be put in place prior to residents moving in to ensure that good travel habits are formed • Development within this area may require demand management measures to discourage additional congestion and minimise trip generation • Development should be allow for easy access to existing rail stations in Harlow and facilitate an integrated bus service
Water	<ul style="list-style-type: none"> • Strong policies are required to minimise water use and maximise water efficiency

14 Equality and Diversity Commentary

14.1 Introduction

- 14.1.1 As a public service provider East Herts District Council must ensure that they deliver services fairly and equitably for all, taking into account the resources available and the communities they serve.
- 14.1.2 Public bodies have a statutory duty to promote equality in the areas of disability, gender and race. The laws regarding age, sexuality and religious belief discrimination are less clear cut. However, it is considered important to include these three strands within assessment practices in light of best practice guidance and government support for a more holistic approach.
- 14.1.3 An equality impact assessment (EqIA) is a tool for identifying the potential impact of a Council's policies, services and functions on its residents and staff. It involves anticipating the consequences of policies, services and functions on the target groups and making sure that, as far as possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised. It can help staff provide and deliver services to residents by making sure that these reflect the needs of the community. By carrying out EqIAs, councils may also ensure that they fulfil their legal obligations under the legislation including:
- Sex Discrimination Act 1975 and 1986
 - The Human Rights Act 1998
 - Race Relations Act 1976 (as amended 2000)
 - Equal Pay Act 1970 (as amended 2004)
 - Disability Discrimination Act 1995 (as amended 2005)
 - Disability Equality Duty 2006
 - Employment Equality (Sexuality) Regulations 2003
 - Employment Equality (Sexual Orientation) Regulations 2003
 - Employment Equality (Religion or Belief) Regulations 2003
 - Employment Equality (Age) Regulations 2006
 - The Work and Families Act 2006
- 14.1.4 Integration of EqIA with other assessments has been encouraged by Government. For example, Planning Policy 12: Local Spatial Planning states:
- Where authorities are required by law or encouraged by government policy to undertake assessments of their plans, such assessments should feed into and be summarised in the Sustainability Appraisal.*
- 14.1.5 A common approach to incorporating other assessments such as EqIA within SA has been to ensure that the scope of the SA is sufficiently inclusive to meet the needs of all sectors of the community. An appropriate baseline to cover equalities issues is included in the 'Community and Wellbeing' chapter in the East Herts Scoping Report. Through this approach the potential equalities effects of the Issues and Options have been considered across the appraisal as each

development strategy option and growth options for each settlement area have been separately appraised.

14.2 Commentary

- 14.2.1 The overall affluence and social structure of East Herts means that the district is distinctive in that the Issues and Options were not judged as likely to lead to any significant equalities impacts. This is explained by a lack of an identified clustering of vulnerable populations combined with the spatial nature of the Issues and Options.
- 14.2.2 However, there are particular equalities principles that can be drawn from the Issues and Options appraisal in light of the social characteristics of the district e.g. its largely rural nature, lack of a primary city or town, and an ageing population structure. These principles should be taken into consideration by the Council during subsequent plan-making stages of the Core Strategy. They are structured according to the six equalities strands.

Race

- 14.2.3 East Herts is not considered to be a racially diverse district and according to the 2001 Census only 2.9 per cent of the total population is from a minority ethnic group. This compares to 6.3 per cent within the County of Hertfordshire. However several principles should be considered by the Council as they prepare subsequent iterations of the Core Strategy. These include:
- The socio-economic profile of East Herts suggests a largely homogenous racial profile. However, figures from a recent Schools Census show that these numbers may have changed considerably since the National Census was carried out. The Schools Census in 2007 recorded 2,819 pupils in East Herts schools who are not from a White British or Irish background, or 12% of the total. The most diverse wards in the District are those in the urban centres of Hertford, Bishop Stortford, Ware and Sawbridgeworth, with around 8% of people in these wards who are not from a White British or Irish background. This implies that there is a possibility that existing or future communities could be defined along ethnic (and/or other) cultural lines and this could present challenges to integration, knowledge of services, and civic participation.
 - Preferred development options (i.e. directions of growth) may lead to development close to or adjacent to existing Gypsy and Traveller sites. Unless travelling communities are canvassed for engagement with the LDF process, and especially with respect to developments in close proximity to authorised pitches, these communities are likely to face social exclusion.
 - It is likely that the high levels of growth over the plan period, particularly with respect to the anticipated development to the north of Harlow, will attract migrant workers. In light of this it will be important to give consideration for setting a framework which fosters appropriate living and working conditions and that an appropriate mix of housing options are available to support a semi-permanent workforce. The impact of potential migrant workers on local economies may require further consideration with Environmental Impact Assessment (EIA) of large-scale development projects.

Gender

- 14.2.4 Whilst the significance of gender issues is a social issue which is not particularly relevant to spatial planning, there are some important issues that have been identified in relation to health.

- 14.2.5 Some large differences in health exist in the district. Women living in the richest areas of East Herts can expect to live five years longer than those in the poorest areas³⁰. Although the evidence base through which this information was obtained did not identify specific neighbourhoods or areas where these inequalities were experienced, this should be followed up by the Council and addressed at subsequent stages of the plan making process.

Disability

- 14.2.6 The Scoping Report highlights that at the time of the 2001 census, 12.4 per cent of the East Herts population said that they had a limiting long-term illness and 5.8 per cent said that their general health was 'not good'. If these two groups are used as the basis for estimating the number of people that may meet the Disability Discrimination Act (DDA) definition of a disabled person then that equates to 18.2 per cent of the population, or just over 23,000 people. In light of this, the following principles should be considered by the Council as they prepare subsequent iterations of the Core Strategy:

- Development strategy options which would lead to increased dispersion of the population may lead to a disproportionate affect on people with disabilities as it may present difficulties in accessing key services and facilities. These issues will be compounded where development occurs in areas with poor public transport provision.
- Development within rural areas or under development strategy options that lead to a wider dispersal may promote a car-reliant, out-commuting culture. This could lead to those with disabilities being socially excluded.
- The Issues and Options could provide greater recognition for the need to ensure that housing is provided where employment (within and adjacent to the district) occurs over the plan period. If an appropriate balance is not delivered then this will present greater difficulties for those with disabilities in terms of accessing employment opportunities.
- There is a need to ensure that the planning of public transport provision considers the needs of disabled people. Public involvement in the design and delivery (e.g. via an on-line forum) may support and improve the implementation of public transport to better fit the needs and desires of disabled people.

Sexual Orientation

- 14.2.7 Sexual orientation was screened out of the appraisal because it was determined during the scoping stage that the proposed LDF policies (including those in the Core Strategy) were not likely to have a significant impact this element of equality of opportunity.

Age

- 14.2.8 Life expectancy in East Herts is above the national average and it is anticipated that there will be a 60 per cent increase in people over 75 years by 2025³¹. In addition to a growing population, this type of structure will have implications for the future delivery of social services

³⁰ East Herts District Council (2009). *Organisational Assessment* [online] available at: http://oneplace.direct.gov.uk/SiteCollectionDocuments/pdf/2009/OrganisationalAssessment/OrganisationalAssessment2009EastHertsordshireDistrictCouncil_Full.pdf (accessed 15 April 2010).

³¹ East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/g/f/Item_5_170409.pdf (accessed 8 April 2010).

and health care. In light of this, the following principles that should be considered by the Council as they prepare subsequent iterations of the Core Strategy:

- Development strategy options which would lead to increased dispersion of the population may lead to a disproportionate effects on older people as it may present difficulties in accessing key services and facilities. These issues will be compounded where development occurs in areas with poor public transport provision.
- There is also a need to ensure that even if the majority of development is concentrated within larger urban areas, public transport in rural areas does not decline. If this does occur then it will increase isolation and the social exclusion of elderly people living in these areas.
- Older people on low incomes are likely to face increased social exclusion as a result of dispersed development options. Older people, as well as those who are disabled and / or do not have access to a car may be adversely affected by development in areas with poor connectivity.
- The high levels of housing that will be delivered over the plan period present opportunities to ensure that high design standards in new residential development are achieved. However, failure to address deficiencies within existing development could lead to serious accidents amongst the elderly as a result of poor housing design.
- There is concern that higher levels of development within East Herts and across the wider area will lead to increased traffic congestion. This could disproportionately affect elderly residents within areas that have poor access to key services (e.g. corner shop or supermarket, post office, doctor or hospital) as it could make access even more difficult.
- Housing affordability is a key issue within the district and is likely to have significant impacts on young, first-time homebuyers. Whilst the overall levels of development will help to address this issue, it is clear that the level of housing that can feasibly be provided within East Herts will be insufficient to make a significant change to affordability issues. Additionally, spatial strategy options which lead to constraints in certain areas (e.g. smaller villages, hamlets) could mean that those growing up in these areas have an even more difficult time buying a house there.

Religion and Belief

- 14.2.9 Religion and belief was screened out of the appraisal because it was determined during the scoping stage that the proposed LDF policies (including those in the Core Strategy) were not likely to have a significant impact on this element of equality of opportunity.

15 Conclusions

- 15.1.1 It is difficult to provide a meaningful conclusion on Issues and Options documents because whilst the primary drivers of negative effects have been identified, the appropriate safeguarding policies have not yet been developed. These will emerge at a later stage in the plan making process.
- 15.1.2 The **Strategic Objectives** presented in the Issues and Options and structured according to specific themes are largely compatible with the different topic areas. Notable exceptions include the potential for new housing development to negatively effect land, landscape and water resources. Similarly, economic development may not be compatible with the need to improve air quality, protect and enhance biodiversity, mitigate and adapt to the impacts of climate change, or to ease pressure on currently stressed water resources.
- 15.1.3 All potential **Development Strategy Options** have the potential to create both positive and negative effects. Our analysis suggests that the most sustainable options are those which accommodate development needs across the entire district yet focus most growth close to existing facilities and services and help to encourage more sustainable travel patterns. This would suggest that Option C: Towns, Larger Service Villages, and Smaller Service Villages represents the most sustainable development strategy. Conversely, the development strategies that either concentrate growth in a small number of locations (Options A, B and E) or distribute it too widely (Option D) are considered less sustainable. It was the most difficult to identify specific effects from Option F: Settlements within Transport Corridors however, it would like be less sustainable than Option C primarily because it would not support growth across the district and could increase traffic levels.
- 15.1.4 These findings were also largely reflected in the appraisal of the different potential approaches to distributing growth. However, it is not clear why approaches that would lead to radical shifts in the settlement hierarchy have been suggested in light of the wider policy context and the significant negative effects that would be expected to emerge through these potential transformations.
- 15.1.5 The potential growth options around **Bishop's Stortford** highlight several key constraints that will need to be considered by the Council. Development in the town centre, whilst supportive of public transport, walking and cycling, is likely to increase air pollution by generating additional traffic in this area and lead to increased risk of surface water flooding. A lack of available land in the existing urban area means that growth will likely need to be accommodated on greenfield land. This could lead to negative effects on biodiversity and landscape whilst also contributing towards high private car use. A greenbelt review should be undertaken and/or an appraisal of the ecological value of the land to help provide determine which directions should accommodate growth.
- 15.1.6 Regardless of where it is situated, development in **Buntingford** is likely to lead to increased greenhouse gas emissions by encouraging greater reliance on private car use given the lack of rail services and relatively isolated, rural location. It is recognised that growth will likely need to be accommodated on greenfield land which could have negative effects against biodiversity and therefore the ecological value of land should be determined prior to decisions being made on which direction should accommodate growth. However, it would appear that options to the south (Option 1), west (Option 2) and to the north (Option 3) would be the most appropriate in

- sustainability terms due to the potential landscape impacts of developing to the northeast (Option 4) and to the east (Option 5).
- 15.1.7 Similar to the options above, for **Hertford** it is recognised that greenfield land will most likely be required for accommodating growth. In light of the need to support more sustainable travel patterns and the cumulative impacts of the loss of greenfield land across the district and the wider region, development in the town centre (Option 1) and within the existing urban area (Option 2) should be prioritised for development. Of the three remaining options, it is not clear which would present best choice on sustainability grounds although a Green Belt Review should play an important role in this decision.
- 15.1.8 Whilst development in the **Sawbridgeworth** town centre would help encourage more sustainable travel, the lack of available land and viability issues further reinforce a need to accommodate growth on greenfield land beyond the edge of the settlement. The potential for growth options 2, 3 and 4 to lead to coalescence with surrounding settlements (with Option 3 coalescence refers to potential development north of Harlow) and the sensitivity of wildlife sites to the southwest and west (Options 2 and 3) suggests that development to the north (Option 4) may be the most appropriate in sustainability terms provided coalescence with neighbouring settlements is avoided. However, in light of these concerns, potential growth in neighbouring settlements (e.g. Harlow, to the north of Harlow and Bishop's Stortford), and capacity constraints on the local road and rail networks, substantial growth in Sawbridgeworth is not recommended.
- 15.1.9 Good access to public transport, and services and facilities in **Ware's** town centre/existing urban area (Option 1) and to the north (Option 2) suggest these areas should be prioritised as growth options. There are constraints to development in these areas however, including land availability (Option 1) and the agricultural/greenfield/Green Belt land required by Option 2 which could negatively affect biodiversity. Of the remaining options the limited availability of land to the south east (Option 4) combined with its location in the floodplain, potential impact on a wildlife site and coalescence issues suggests that it is not appropriate on sustainability grounds. Development to the east (Option 3) and to the south west (Option 5) are both constrained due to their location in the Green Belt, coalescence issues and further reasons so it is not clear which Option is preferred. A Green Belt Review could help to identify the most appropriate location for accommodating further development.
- 15.1.10 The impacts of the district wide development strategy options on **villages** have been considered under the Council's development strategy options (see above) so they will not be repeated here. However, suggestions can be found in the main report on what some of the unique needs of rural villages in East Herts may be and how these can be included in subsequent stages of the plan making process.
- 15.1.11 The important point made in this discussion was that the way that we think about 'sustainability' is different for rural areas and this needs to be recognised by the Core Strategy. For example, new housing should ideally be located close to public transport services but in many rural areas this isn't possible. However, this does not mean that new rural areas should receive no new development. On this basis the Council is encouraged to develop a policy framework that takes into account a need to encourage more people to use sustainable modes of transport (train, bus, cycling, walking) but also allows rural village economies to thrive.
- 15.1.12 Other key rural concerns that were highlighted include:

- how growth of the five towns can have negative effects on smaller surrounding villages by attracting all the key services;
- the need to ensure planning policies do not overly constrain the development of new businesses as they require additional space and take on more employees;
- questions over the housing mix and tenures that should be allowed in rural villages where most of the inhabitants commute to work in larger towns or are retired and whether a more balanced population mix should be actively promoted through housing-related policy.

15.1.13 The large scale development to the **north of Harlow** will lead to significant sustainability effects within East Herts so it is important to remember that the primary objective of this development (as set out in the East of England Regional Plan) is to facilitate the regeneration of Harlow. The key sustainability issues for the north of Harlow really bring to light the trade-offs that must be made in bringing forward development of the scale proposed.

15.1.14 Whilst the development will be positive in terms of increasing sustainable travel and providing more affordable housing, there will be permanent negative effects to the area's biodiversity, landscape character, and more pressure on road and rail networks (this is likely to include higher levels of congestion). It is also most likely that the character of smaller settlements such as Gilston, Eastwick and Hunsdon will be irreversibly changed and there are worries over the potential coalescence with Sawbridgeworth. There are also concerns over the impact of development on the integrity and tranquillity of the River Stort and the Stort Valley.

15.1.15 The nature of the development means that whilst it will be possible to put measures in place (e.g. ecological surveys and a Green Belt Review, the ultimate location of development, design policies, etc.) that will help to minimise these negative effects it will probably not be possible to eliminate them altogether.

Summary of all development options

15.1.16 The level of new development that East Herts needs to provide means that some negative effects are inevitable. For example:

- more housing and new employment will place greater pressure on existing water resources which in turn could have secondary impacts on wildlife sites and biodiversity;
- the largely rural nature of the district in combination with high levels of car ownership mean that regardless of the proximity of new homes to rail, bus, walking and cycling facilities, higher levels of growth will lead to more trips and more congestion on the district's road network;
- the low availability of land within existing urban areas means that new development will need to go on greenfield land, most of which will also be in the Green Belt and is currently being used for agriculture. When viewed in a wider context the incremental loss of greenfield land across the region contributes overall towards harm to biodiversity.

15.1.17 However, it is important to note that lowering the amount of new housing built in the district would also lead to significant consequences. For example, lower housing growth would lead to increased problems of affordability, stifle local economic growth (particularly in rural areas), and

it would make it more difficult to achieve a real shift towards more environmentally-friendly transport patterns and types of housing.

15.1.18 In addition, in choosing an appropriate development strategy consideration will also need to be mindful of several sub-district issues including:

- It is not desirable to locate all development within areas that are close to good transport links and existing services and facilities. Growth will need to be spread throughout the district to ensure that undue pressure is not placed on the towns and so that rural lifestyles and economies are supported. However, it is probable that the large volumes of new open market housing which would be required in order to significantly improve affordability would considerably alter the character and setting of such villages.
- Whilst traffic congestion is an issue across the district, the Council will need to be mindful of the cumulative impacts of development within the district and in neighbouring districts on both the A1(M) and the M11 as well as the local road network. This will be a particularly important issue towards the south-east of the district where large scale development is planned to the north of Harlow. This highlights a need to ensure that new houses are built close to employment sites.

15.2 Summary of mitigation suggestions

15.2.1 Mitigation recommendations are suggestions made by Scott Wilson for different ways to ensure that the negative effects of the plan are stopped or reduced. In some cases it is also possible to suggest ways to enhance the beneficial effects that the plan might have. Based on the appraisal of the East Herts Issues and Options, the following range of key mitigation recommendations have been made:

- To offset the increased traffic levels it will be important for the Council to both ensure a good balance between the location of jobs and homes, maximise sustainable travel (e.g. ensure that new development is located close to public transport services, provide public transport services before development is completed, provide walking and cycling facilities) and to ensure appropriate measures are put in place to reduce the need to travel.
- To address the high levels of affordable housing need and high house prices the Council could consider providing more housing within the district and / or ensuring that new developments contribute a high proportion of affordable housing. However, measures to provide higher amounts of housing would need to be considered against potential harm on the character of the district, the environment and the additional stress that would be placed on the district's physical infrastructure (such as the road network).
- To counter the negative effects on biodiversity which are caused by using greenfield and agricultural land for new housing a range of measures have been recommended. These include: carrying out additional studies and surveys so that the Council is aware of which land has the least ecological value; maximising opportunities to develop within existing urban areas; and promoting the protection and integration of green infrastructure within new development.

- Development should avoid areas at high risk of flooding (either from rivers or surface water flooding). Where this is not possible appropriate design features should be demanded and discussions over surface water flood risk should be undertaken with the relevant infrastructure providers (such as Herts Highways) prior to giving permission for new development.
- Sufficient flexibility should be provided within planning policy to allow appropriate commercial development within the district's villages whilst maintaining their character.
- In deciding on where development should be allowed to proceed across the district, the Council must also attempt to minimise negative impacts on features of the historic environment. Attempts should first be made to locate new development away from sensitive features and secondly, supporting safeguarding policies should be put in place.
- The topography of the district should play a strong role in the Council's decision making for new development and natural landscape boundaries (e.g. ridgelines) should not be breached if possible.
- The existing problems with water scarcity in the East of England mean that the Council needs to include policies which help to both reduce the demand for water as well as increase the efficiency of water use within new development.