

Appendix B **Key Documents and** **Consultation Feedback**

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This document is a 'background paper' referred to in Agenda Item 8 of the District Planning Executive Panel, 26th July 2012. It is subject to a period for Member comment until 31st August 2012.

Bishop's Stortford

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy.

The second part of this section sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

The documents in the first part of this section have been grouped as follows:

Town/Community Documents:

This includes documents prepared by the 2020 Group

- Bishop's Stortford Masterplanning Study (Roger Evans Associates, 2005)
- Further Assessment of Air Quality at Hockerill Junction (Faber Maunsell, 2008)
- Bishop's Stortford Waterspace and Landscape Strategy (British Waterways/ East Herts Council, 2009)
- The People's Vision for Bishop's Stortford (Bishop's Stortford Civic Federation 2009)
- A Vision for Bishop's Stortford (Bishop's Stortford 2020 Group, 2009/10)
- Bishop's Stortford Town Plan (Bishop's Stortford Town Council, 2010)
- Mill Site Development Brief (East Herts Council, 2010)
- The Areas of Special Restraint – Paper by Michael Hurford, President of the Bishop's Stortford Civic Federation (2010)
- Goods Yard Development Brief (East Herts Council, 2011)

County and Regional Documents:

- Hertfordshire County Structure Plan – Development Strategy Consultation Document (1996)
- Stansted/M11 Corridor Development Options Study (2003)
- East of England Plan – Report of the Panel (2006)
- Regional Scale Settlement Study (Arup, 2009)

Uttlesford District Council Documents:

- Water Cycle Study (2010)
- Employment Land Review (2011)
- Uttlesford Annual Monitoring Report (2011)
- Uttlesford District Council –Draft Local Plan (June 2012)

Sustainability Documents:

- Sustainability Appraisal Scoping Report (Scott Wilson, 2010)
- Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Housing Documents:

- Strategic Housing Market Assessment (ORS, 2010)
- East Hertfordshire Population & Household Forecasts – Parish Groupings and Towns (Edge Analytics, May 2012)

Land Availability Documents:

- The Strategic Land Availability Assessment (East Herts Council, 2012)

Economy Documents (Employment/Retail):

- Employment Land and Policy Review (Halcrow, 2008)
- East Herts Economic Development Strategy 2007- 2012 (East Herts Council, 2007)
- Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)
- Retail and Town Centres Study (Chase & Partners, 2008)

Flooding and Water Infrastructure Documents:

- Strategic Flood Risk Assessment (East Herts Council, 2008)

Infrastructure Documents:

- Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

Transport Documents:

- Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009)
- Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)
- Bishop's Stortford Transport Study (2006)
- Bishop's Stortford and Sawbridgeworth Urban Transport Plan (forthcoming)

Sport and Leisure Documents:

- PPG17 Audit and Assessment (PMP, 2005)
- East Herts Assessment of Sports Facilities (East Herts Council, June 2011)
- East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

Green Infrastructure Documents:

- East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

Town/Community Documents:

Bishop's Stortford Masterplanning Study (Roger Evans Associates, 2005)

This detailed study establishes an Urban Design Framework for the Areas of Special Restriction (ASRs) to the north of the town. It reflects a spatial planning approach which looks at the whole town, including not just the physical

environment but also the range of activities within it. The study examines the capacity of the land to area to the north to accommodate growth and the potential impact on the town. The importance of the relationship between the development area and the town centre facilities is highlighted. Some ideas of town-wide importance arising from the study included possible Park and Ride provision, a circular bus route through the development and linking with the town centre, and enhanced provision of walking and cycling facilities along the radial routes into the town centre.

Further Assessment of Air Quality at Hockerill Junction (Faber Maunsell, 2008)

Modelling carried out by Faber Maunsell as part of the 2005 detailed assessment/progress report indicated that nitrogen dioxide would exceed the Government objective at the Hockerill junction. The results from the continuous monitor at the crossroads confirmed this and the area was declared as an Air Quality Management Area (AQMA). The continuous monitor was decommissioned after 18 months of operation.

However the diffusion tube network within the AQMA was expanded and now there are three tubes in triplicate on each branch of the crossroads. The current data corroborates the declaration of the AQMA. The main source of nitrogen oxides at the site is traffic. The results of a source apportionment study determine that the Heavy Good Vehicles are the biggest producers of nitrogen dioxide at the site.

Bishop's Stortford Waterspace and Landscape Strategy (British Waterways/East Herts Council, 2009)

This document was prepared by British Waterways in partnership with East Herts Council, in order to assist in promoting opportunities to unlock the unrealized potential of the waterfront. It takes a Green Infrastructure approach to multi-functional open space focused on the riverbanks and towpath. It suggests a number of possible schemes, including a marina and a new pedestrian footbridge at the Mill Site. The new Stort pedestrian/cycle bridge links the station and the Rhodes Arts centre and could form a 'pivotal access point' to the river.

The People's Vision for Bishop's Stortford (Bishop's Stortford Civic Federation, 2009)

In summary, this document includes the following points:

- Medieval street pattern of the town means that it is incapable of accommodating additional traffic
- Town must not expand beyond 40,000 population
- Bishop's Stortford has borne the brunt of all new housing in the last twenty years and is now the largest town in the district
- Key features of the historic market town must be protected
- All new buildings must be in styles complementary to existing historic buildings
- Housing developments must focus on traditional family homes with gardens – no more flats

- Town centre should be enhanced with quality office accommodation to attract major organisations, and market traders should be attracted
- Waitrose and Causeway car parks must remain because they are accessible and provide an essential facility
- Need a comprehensive transport strategy including a Park & Ride
- Town must have an Urgent Care Centre
- New school at Hadham Road Reserve Secondary School site
- Airport should not exceed its current capacity

A Vision for Bishop's Stortford (Bishop's Stortford 2020 Group, 2009/10)

This document was prepared by a group of local interests: Bishop's Stortford Chamber of Commerce, Bishop's Stortford Town Council, Bishop's Stortford Civic Federation, Hertfordshire County Council, and Hertfordshire Community Foundation.

The document identifies a need for a strategic and structured approach to planning in the future and notes that "*there are tensions between many of the things that people desire from the town. Importantly, the response must balance what local people and the town want and need. We do not have the power to deliver all of this; indeed some are controversial and would not be done without major consultation, but these set a scene for how Bishop's Stortford might be moved from where we are, to where most of you say you wish to be*". Town centre challenges are noted including: the area around the railway station, the Causeway Site, Goods Yard site, Mill site next to the river, North Street/South Street, Hockerill Junction, Dane Street, Riverside.

Broad challenges and principles are outlined. These include

- whether/what the optimum size of the town should be (acknowledging a trade off between the size of a town and what it can afford to support)
- how to balance the pressures of development with preservation of the natural & historic environment
- Promoting volunteering
- Reducing vehicular carbon emissions
- Any development in the town must have proper, appropriate infrastructure in place and existing infrastructure must be improved.

Vision and possible solutions are as follows:

- *Traffic and congestion*: The Vision is that access in and around the town should be easy and attractive and not limited by congestion. Solutions may include Park and Ride, transport hub at the railway station, ultra-light railway access, selective pedestrianisation;
- *Shopping in town*: The Vision is of a bustling high street supported by national anchor stores, whilst keeping a strong independent retail presence and a thriving market. Solutions may include redevelopments in the town to provide high quality retail premises;
- *Employment and Economy*: The Vision is of a town that has built on its vitality and is attractive to potential businesses because it provides the skills and energy where businesses can grow and flourish in a sustainable way. Solutions may include identifying and promoting

employment land in the town, and identifying potential sites within the town for mixed use of housing retail and professional use, and attracting a new generation of specialist industry into the town. e.g. low carbon based industries, and encourage industrial activities that no longer fit in their present location to relocate to the outskirts of town;

- *Housing:* The Vision is of housing supply that meets the wide range of housing needs in and around the town in terms of desirability, affordability and sustainability. Solutions may include a clear local development framework that promotes the long term sustainability of the town; working with developers to ensure housing needs for both social and private housing are satisfied; development in the town centre that encourages and facilitates town centre living opportunities for families; housing that is close to work, leisure and/or recreation, reducing the need to travel by car;
- *Education and Training:* The Vision is to see the good schools that already exist in the town reinforced and strengthened, and the capacity of the town increased as a source of skills and achievement. It is noted that Bishop's Stortford is a magnet for those looking to provide good schooling for their children, including many from across the border in Essex. How do we ensure this does not result in local children not being able to attend the schools of their choice? Facilities should be provided to enable schools to meet their aspirations;
- *Leisure, Culture and Community:* The Vision is of leisure, culture and community groups and organisations being encouraged to thrive and add to the overall vitality and attractiveness of the town as a place to enjoy leisure time. Solutions may include support for a major conference/hotel/entertainment venue in the locality;
- *Our river and waterfront:* The Vision is of a river and waterfront attractively integrated into the town. A river and riverside that is well used and valued by people of the town and which adds to the overall feel of the town and contributes to its economy, its leisure and its sustainability;
- *Parks and Green Spaces:* The Vision is of our parks and green spaces protected and preserved, but developed in a way that meets the needs of the 21st century – balancing environmental, social and economic considerations

Bishop's Stortford Town Plan (Bishop's Stortford Town Council, 2010)

Bishop's Stortford Town Council adopted a Town Plan in 2010. The key aim of the Town Plan is to reflect the views of the residents of Bishop's Stortford, as to how they would like to see their town develop in the future and it sets out 78 specific actions which the Town Council will take to enhance the town. It is understood that the Town Council have resolved to produce a neighbourhood plan by May 2015.

The Town Plan includes a vision based on the findings of a residents' survey. It states that modern developments should complement and enhance the historic core. It concludes as follows: "*By the year 2020 Bishop's Stortford is widely recognised as a strong example of how a traditional market town can exploit the opportunities of a modern society and has evolved to meet current*

needs, whilst retaining a highly desirable character.” One of the planned actions contained within the Town Plan states that “The Bishop’s Stortford Civic Federation will be invited to investigate innovative housing solutions and East Herts Council will be requested to revisit its policies regarding approving the development of flats in the built-up areas of the town.” Based on the residents’ survey, “the majority of people in the town are opposed to the expansion of the Airport and the building of a second runway.”

The Town Plan mentions the area north of Bishop’s Stortford in relation to residents’ concerns that walking areas could be lost if the ASRs are built upon, and a comment in the questionnaire that development in this area would move the countryside out of reach.

The Mill Site Development Brief (East Herts Council, 2010)

The brief recognises the strategic importance of this site, as explained in Local Plan 2007 Policy BIS12. The brief notes that the site is currently occupied by Westmill Foods, Days and Sons Stone Masons, Sheppard’s Garage and The Fountain bar and restaurant. It is suggested in the brief that the Mill Site would be suitable for limited residential development above commercial employment uses. It also suggests a need for a new pedestrian bridge linking with the town centre, and further investigation of the narrow Station Road bridge.

The Areas of Special Restraint: paper by Michael Hurford, President of the Bishop’s Stortford Civic Federation (2010)

The paper makes a number of points:

- Allowance for airport-related housing is confusing and does not provide a justification for new housing
- 2,000 houses built in the town since the designation of the ASRs at Bishop’s Park, College Fields and St Michael’s Mead. There are ‘just car parks with houses on’
- No check has been carried out of the original assumptions on which the original housing designation was based
- The 2006 Transport Study did not suggest solutions to the transport problems identified in the Masterplanning study (2005), apart from suggesting the establishment of a Park & Ride facility.
- Further traffic growth arising from the expansion of Stansted airport to 35 million passengers and 650 houses at Stansted and 800 in Takeley
- The Catchment Abstraction Management Survey states that the Stort is ‘over-abstracted’ with low flows, and no further licences will be granted
- Development of the ASRS would be unsustainable because it would destroy an area of agricultural diversity and recreational value
- Residents of nearby villages will struggle to access facilities in the town through the semi-permanent traffic jam

Endorsement of this paper was received from Little Hadham Parish Council, which expressed concerns about the effect of development at the ASRs on the existing traffic bottleneck at the Little Hadham traffic lights on the A120.

The Goods Yard Development Brief (East Herts Council, 2011)

The brief identifies a desire to alter the balance of housing and other land uses contained within Local Plan 2007 Policy BIS11 and the previous (2004) development brief for the site. It suggests that a higher proportion of retail and employment should be provided, and that residential development would ideally be limited to a small amount of family accommodation to the south of the site. In addition, the brief suggests that the need for a link road through the site should be re-evaluated using transport modelling.

County and Regional Documents:

Hertfordshire County Structure Plan – Development Strategy Consultation Document (Hertfordshire County Council, 1996)

This document sets out the rationale for the development strategy within the former Structure Plan. Developments of less than 500 dwellings would not normally require identification at a strategic level in the Structure Plan (Page 11).

Firstly, the ‘least suitable’ areas for development are excluded as follows:

- Chilterns Area of Outstanding Natural Beauty
- South Hertfordshire (a broad largely south of the A414 as far as the A10). Over-congested, poor east-west passenger transport links, important function of Green Belt in avoiding coalescence.
- Other rural areas: no rail access, small and remote from main urban settlements.

Secondly, ‘less suitable’ areas include the Stort Corridor, including the towns of Harlow (in Essex), Sawbridgeworth and Bishop’s Stortford. This corridor is already experiencing major housing development in both Hertfordshire and Essex, mainly related to Stansted Airport. Sufficient housing land has already been allocated to meet the needs of employment growth associated with the airport’s permitted capacity. That being the case...meeting local housing needs provides a strong rationale for steering additional development away from this corridor in the extreme east of the county to towns in western and central areas [i.e. Watford/Hemel Hempstead/ A1(M) Corridor]....development locations along the Stort Valley which would exacerbate road congestion in the towns, particularly in view of the uncertainty about if and when an M11 link road will be constructed. [Page 25]

Stansted/M11 Corridor Development Options Study (2003)

The study establishes a development framework which can be adjusted to different development options for Stansted Airport, including options with and without a second, third or fourth runway. The study states that *“there is no way of avoiding environmental impacts – it is rather a question of minimising them or trading them off against other objectives.”*¹ The principal characteristics of the development framework are:

- The expansion of Harlow (extensions to the south, west and east only)
- The development of settlements along transport corridors.

¹ Page 58

- The need to introduce high capacity public transport along the growth corridors (the A120 and M11).
- The supportive role of major settlements (Cambridge, Colchester and Chemsford) which are on the edge of the study area, which are expected to continue to experience growth.

The study proposes two rapid transit busway routes: Route 1 between Epping (Central Line) and Stansted in a north-south direction along the A1184 through Harlow and Sawbridgeworth, and Route 2 operating between Braintree and Bishop's Stortford in an east-west direction. Route 1 was estimated at £18m assuming 2km of guided busway, 10km of bus lanes and bus priority measures, a new bridge over the M11 and 12 new articulated buses to operate at least a 10 minute frequency. A proposed 5,000 space satellite airport car park at North Weald to help relieve pressure on airport approach roads is costed at £5m. A guided busway running along between a 5,000 space car park at Braintree and Stansted airport is proposed to alleviate congestion on the A120. Route 2 is estimated at £30 million included 10km of guided busway along a disused railway line between Braintree and Bishop's Stortford². The study also proposed a Personal Rapid Transport (PRT) system to serve the existing Harlow settlement area and extensions to the south, east and west of the town. According to the study a PRT system such as ULTRA is likely to be self-funding and attract significant developer contributions providing that there is some initial pump-priming from the public sector³.

East of England Plan – Report of the Panel (2006)

In relation to Stansted Airport and the A120, the report of the independent planning panel on the draft plan states: *“We also find there is much to support the Plan’s strategy of channelling housing and job growth not directly related to the airport to Harlow. The nearby towns of Bishop’s Stortford, Dunmow and Braintree have already provided considerable housing, but much of this appears to have been taken up by people commuting to work elsewhere rather than working at Stansted or in (airport related or other) jobs created locally. While there is a certain amount of further scope for development at these towns, the capacity for both housing and employment growth is greater at Harlow (even with the reduction in housing we have proposed at R5.10).”*

Regional Scale Settlement Study (Arup, 2009)

This study sought to identify areas suitable for a regional scale settlement of 20,000 dwellings as a review of the East of England Plan to 2031. It concluded that the Braintree area and south of the A120 in Essex could be appropriate locations. The study considered Bishop's Stortford to be a good location but otherwise constrained. The study states that:

“From a locational and transport connections perspective, Bishop’s Stortford in East Hertfordshire appears to be a logical location for growth. However, on examination of the particular circumstances for this settlement, it is clear that it could not accommodate growth of 20,000+ dwellings. Bishop’s Stortford is a market town surrounded by Greenbelt, which would need to be reviewed if

² Pages 97-98

³ Page 89 and Figure 5.7

*development was to occur here and sections of the landscape are absolutely constrained by electricity transmission lines. Furthermore it appears near to its natural capacity given the boundaries set by the M11 and A120. These physical and environmental constraints combined with transport and infrastructure capacity constraints suggest that Bishop's Stortford is not a suitable location for a regional scale settlement.*⁴

Uttlesford District Council Documents:

Water Cycle Study (2010)

This suggests that some development within Uttlesford may drain to the Bishop's Stortford Sewage Treatment Works.

Uttlesford Employment Land Review (2011)

This suggests that there is demand for 'strategic' warehousing and a strong demand for high quality offices accessible from Junction 8 of the M11.

Uttlesford Annual Monitoring Report (2011)

Uttlesford District Council has granted planning permission for a number of large developments in recent years, several of which are currently under construction as follows:

Major development locations	Extant permissions	Completed as at 31/03/12	Still to complete
Great Dunmow (inc Woodland Park)	1649	785	864
Stanstead Mountfitchet (inc Rochford Nurseries)	719	334	385
Felstead	870	716	154
Takeley	815	448	367
TOTAL	4054	2283	1770

Source: Uttlesford AMR Appendix 3: Trajectory Data

Uttlesford District Council –Draft Local Plan (June 2012)

The strategy proposed in the consultation document is based on the existing Local Plan settlement hierarchy, which consists of two market towns and six key settlements. This proposal moves away from an earlier proposal for a single large development based around the railway station at Elsenham and promoted by developers as part of the previous Government's 'Eco-Towns' programme. The housing strategy (Policy SP6) proposes 3,314 new allocations, including 1,150 new dwellings at Great Dunmow, 880 at Saffron Walden, 400 at Elsenham, 100 at Great Chesterford, 370 at Newport, 60 at Stansted, 200 at Takeley, and 100 in the rural settlements. The strategy also proposes additional employment land at Stansted airport, Saffron Walden, Start Hill, Great Dunmow, Chesterford Park, Gaunts End and Alsa Street/Stanstead Mountfitchet. Additional retail is proposed at Saffron Walden and recreation facilities to support new development. It is noted that the employment Land and Policy Review 2006 suggested 25 ha of additional land, although the distribution strategy does not suggest how this should be

⁴ Page 177, Section 9.5.3

allocated to the various sites. The strategy also notes the Uttlesford Water Cycle Strategy (2010) suggests that new development at Takeley could drain to the Bishop's Stortford Waste Water Treatment Works.

Sustainability Documents:

Sustainability Appraisal Scoping Report (Scott Wilson, 2010)

Explanation of the Council's approach to sustainability appraisal is contained in Section 1.12 of the Supporting Document. The views of a number of consultees on a draft of the Scoping Report were sought, including Bishop's Stortford Town Council, Bishop's Stortford Civic Federation, the Bishop's Stortford Town Centre Partnership, Bishop's Stortford Ratepayers Association, Bishop's Stortford Chamber of Commerce, and Bishop's Stortford Mencap, Chantry and Old Thorley Community Associations, Bishop's Park, Hockerill, Parsonage and Thorley Manor Residents Associations, CAUSE (Campaign Against Unsustainable Stansted Expansion) and Stansted Airport Ltd.

The Scoping Report established a Sustainability Appraisal Framework including spatial areas and nine assessment topics. Six 'Spatial Areas' were identified as a planning tool to facilitate consideration of the strategic planning functions of different parts of the district. Broadly, these were based on Housing Market Areas plus consideration of additional functional relationships. The 'M11 Stort Corridor' spatial area drew attention to programmed improvements to the M11 and A120 in Essex. It also highlighted the major opportunity presented by the Stort Valley, at the heart of the vision for a Green Infrastructure Network for the Harlow area. The analysis states that the area is characterised by low levels of self-containment and house prices which are approximately 110% to 125% above the regional average. These are significantly higher than in neighbouring Harlow but less than most of the rest of the district.

In terms of Bishop's Stortford specifically, 61% of employed residents commute outside of the town. Approximately 64% use the car to get to work while 15% rely on public transport. 11% of residents commute either by foot or bicycle. Approximately 46% of residents work in East Herts, only 5% in the rest of Hertfordshire, 29% in the rest of the East of England, 19% in Greater London and 2% in other regions. As could be expected, there are strong commuting relationships between Bishop's Stortford and the larger nearby areas such as Uttlesford, Harlow, and inner London. Additionally, 7.6% of residents travel to work at Stansted Airport.

The Scoping Report comments on what is likely to happen if a District Plan is not produced. Without the plan the increasing levels of congestion within the area are likely to continue, particularly given the high levels of planned growth in and around Harlow. It is likely that without appropriate planning of adequate employment facilities to provide for growth, particularly at Stansted Airport, the area will experience decreasing levels of self-containment, generating additional vehicle trips on the local road and motorway network. While the Stort Valley remains remarkably unaffected by the M11, Stansted Airport and high levels of traffic on nearby roads, without the plan it is unlikely that this

situation will remain. In addition, opportunities to maximise the Stort Valley's potential as part of the wider area's green infrastructure network will not be realised.

The Scoping Report also addressed a number of assessment topics. Many of the issues apply district-wide and have already been addressed in Chapter 2. The key messages in the Scoping Report in relation to Bishop's Stortford are:

- Air Quality – will need to be monitored in relation to the Air Quality Management area at Hockerill lights.
- Biodiversity - Thorley Flood Pound SSSI is described as 'unfavourable declining', the Stort Valley is one of 29 'Key Biodiversity Areas' within the County, and the Red White and Blue (north of Grange Paddocks) is mentioned as an example of 'Natural and semi-natural greenspace'.
- Climate Change and Flood Risk - flood storage along the River Stort could help to alleviate downstream flood risk. Opportunities to address these issues through the plan are suggested.
- Health and Wellbeing - there is a need to ensure that the equality, health and social care needs of a growing and ageing population are met.
- Economy and Employment - the growth of Stansted Airport has led to the creation of many new opportunities including airport related service industries such as food preparation. East Herts has suffered declines in employment despite population growth 1995-2005, although employment deprivation is low, suggesting increased employment of residents outside the district.
- Historic Environment – no comments specific to Bishop's Stortford, and the issues addressed are covered in Chapter 2 and the Historic Assets topic assessment.
- Housing – no comments specific to Bishop's Stortford, and the issues addressed are covered in Chapter 2.
- Land – no comments specific to Bishop's Stortford, and the issues addressed are covered in Chapter 2, and the Green Belt topic assessments.
- Landscape – no comments specific to Bishop's Stortford, but draws attention to the need to address fragmented landscapes, including features such as hedgerows.
- Transport – identifies that there are particular congestion hotspots in Bishop's Stortford and Hertford. Housing growth appears to drive higher projected traffic growth in East Herts than in other districts within the County.

- Water – most of the issues are addressed in Chapter 2. However, the study also notes that major aquifers are very sensitive to potential pollution and in East Herts the vulnerable major aquifers occur where chalk outcrops appear at surface level, which is the case north of Bishops Stortford⁵. In addition, it is noted that the Stort Navigation is classed as having ‘poor’ ecological status, which will need to be addressed in order to comply with the European Water Framework Directive’.
- European Sites – this relates to the European Habitats Directive. This will be assessed in Chapter 5.

Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Sustainability appraisal of the Issues and Options Consultation document was undertaken using the SA Framework established by the SA Scoping Report. The Issues and Options document was a discussion paper and did not propose any development options, and the appraisal was therefore high-level. The appraisal made some general comments about the growth options for Bishop’s Stortford contained within the Issues and Options document. The existing urban area was assessed as the best location for new development, although potential impacts on air quality at Hockerill were noted. Development to the east was assessed as having the potential to increase car-based travel because of proximity to Junction 8. Opportunities for development to the south to link with the Green Infrastructure of the Stort Valley were suggested. Other items in the appraisal have been addressed separately as part of the assessments of the areas of search in this Supporting Document.

Possible mitigation measures were suggested, including demand management measures to address congestion problems and air quality issues at Hockerill AQMA. It was also suggested that if development on Greenfield land is required then a strategic assessment of Greenfield biodiversity value should be undertaken, potentially drawing on available evidence sources (e.g. previous EIAs). It was suggested that measures will be required to minimise the risk of fluvial and surface water flooding for development in the town centre, and that strong policies are required to minimise water use and maximise water efficiency. It was also suggested that strong safeguarding policies regarding impacts on the Conservation Area will be required if development is focused within the town centre. Finally, it was recommended that sustainable transport infrastructure (i.e. bus routes, station upgrades, cycle and walking pathways) should be in place prior to the arrival of new residents, and that requirements for travel plans in new development should be set.

⁵ Groundwater vulnerability relates specifically to certain land uses, such as petrol filling stations, gas works, railways, electricity transformers, landfill sites, and light and medium engineering facilities. See page 95 of the study. Residential and most employment uses pose a low risk to the aquifer

Housing Documents:

Strategic Housing Market Assessment (2010)

Bishop's Stortford is located within the Harlow/M11 Corridor strategic housing market area. Travel to work data indicate flows from Bishop's Stortford and Sawbridgeworth into Harlow, and relatively high levels of self-containment within Harlow itself. Based on these flows, Bishop's Stortford and Sawbridgeworth are identified as satellite settlements to Harlow within the sub-market area⁶. Hertfordshire and north-west Essex have been attracting families, with a substantial net gain in both the 25-44 age groups and the 0-15 age groups. Harlow, however, is losing people in these age groups. The study indicates 5-year net migration into East Herts of over 1000 people from both Harlow and Broxbourne between 2002 and 2007, and out-migration over 1000 people from East Herts to Uttlesford over the same period.

East Hertfordshire Population & Household Forecasts - Parish Groupings and Towns (Edge Analytics, May 2012)

This technical work generates a number of different demographic scenarios at the Sub-District level, including for each town. Whilst this information does not provide the 'answer' to the level of housing growth in a particular area, it can be used as the starting point for plan-making purposes that provides an indication of the level of housing required that then needs to be tested against planning policy, physical and environmental considerations. It may be the case that, in planning terms, a particular location cannot accommodate the level of development required to meet its housing needs. Equally, there may be valid planning reasons why a particular location should accommodate more than its forecasted growth. The following outputs were generated for Bishop's Stortford:

Scenario	Household	Change	Average Dwellings Per Year	20 Year Total
	2010 - 2033 No.	%		
Bishop's Stortford Town				
Sub-National Population Projections 2010	6,894	43.1	307	6,140
Nil-Net Migration	2,314	14.5	103	2,060
Natural Change	3,570	22.3	159	3,180
Migration-Led	6,268	39.1	279	5,580
Completion Rate - 10 Year Average	3,110	19.4	138	2,760
Bishop's Stortford and Northeastern Parishes				
Sub-National Population Projections 2010	7,505	40.6	334	6,680
Nil-Net Migration	2,692	14.6	120	2,400
Natural Change	3,973	21.5	177	3,540

⁶ Page 45

Migration-Led	6,784	36.7	302	6,040
Completion Rate - 10 Year Average	3,447	18.7	154	3,080

Land Availability Documents:

The Strategic Land Availability Assessment (East Herts Council, 2012)

The SLAA considers the likelihood of sites coming forward for development within the built-up areas of the Six Main Settlements and Category 1 Villages in East Herts. It assesses the availability, suitability and achievability of sites and was subject to stakeholder engagement in May/June 2012. For the built-up area of Bishop's Stortford the interim findings are that 1,233 dwellings could be built within the Built-Up Area of Bishop's Stortford, dependent on the relocation of the secondary schools.

Economy Documents (Employment/Retail):

Employment Land and Policy Review (Halcrow, 2008)

Text from this study pertaining to Bishop's Stortford is reproduced in full and shown in italics below.

Options for meeting future employment land need:

Through the consultation process and the review of the demand and supply for employment land and premises in East Herts it has become obvious that the District is faced with a scarcity of potential new employment locations. Of the potential new locations identified, those located in Bishop's Stortford score the highest, reflecting the high demand for employment sites in and around the town. The three top ranking potential new allocations are all located in or around Bishop's Stortford reflecting the town's key role as the District's premier business location and the town's current levels of demand and supply. [Page 84]

The former park and ride site adjoining Woodside Estate in Bishop's Stortford is the top ranking potential new allocation site. This is based largely on the fact that Woodside is the top rated existing employment site in the District, helped by its location in Bishop's Stortford and its proximity to the M11 junction. The site is currently vacant having been previously used for park & ride, meaning that it scores highly in terms of site assembly and the fact that demolition would not be required in order to bring it forward for development. As the site is located within an existing estate it already has a high level of infrastructure provision. The site's development for B1 use would greatly improve Bishop's Stortford limited supply of B1 land and premises, which is not currently sufficient to meet market demand.

The Areas of Special Restraint (ASR1 to ASR5) in Bishop's Stortford are ranked second. The ASRs score highly in terms of potential marketability based on them being in Bishop's Stortford and their location to the north of the town meaning that they have good access to the M11 junction and good

visibility. These various sites are all greenfield meaning that they score highly in terms of deliverability, although this does reduce their sustainability score. The site at Whittington Way, Bishop's Stortford is ranked third. Its rank is based on the fact that it is located in Bishop's Stortford receiving a high score in terms of marketability. It also receives a high score in terms of deliverability as it is a greenfield site meaning that site assembly is not an issue in the sense that the removal of tenants would not be required. This also means that demolition would not be required, enhancing its sustainability score. Where the site is marked down is based on its location to the south of Bishop's Stortford. While it is adjacent to the A1184, achieving a good score for visibility, its access to the M11 is restricted. Its greenfield status also means that it scores poorly in terms of infrastructure provision. [Page 79]

The Office Property Market Overview states:

According to local commercial property agents, it is East Herts' relatively poor road links that has restricted demand from large occupiers. The north east of the local authority, namely Bishop's Stortford, has tended to see stronger levels of demand from large 'in-coming' occupiers than seen elsewhere in East Herts due to its proximity to the M11. This is reflected in the annual increase in take-up in Bishop's Stortford averaging approximately 88% per annum between 2005 and 2007. In contrast, Hertford and other centres to the south west which do not have the same road links are considered secondary locations. [Page 21] East Herts is not a prime office location compared to Stevenage, Luton or Harlow, but demand is high which is reflected in high rental values. Units tend to be small. [Pages 21-22]

The Industrial Property Market Overview states:

The same factors restricting demand from large occupiers in the office market apply to industrial demand. Good road links are a top priority for industrial and warehouse occupiers, and it is only Bishop's Stortford that meets these requirements. This is reflected in the level of take-up seen in Bishop's Stortford. As a result of the low levels of demand seen for industrial space in East Herts quality of stock is generally poor, which acts as a further barrier to attracting large occupiers. Indigenous companies are likely to continue to drive the market but net additional demand will probably remain negligible. Hertford and Bishop's Stortford dominated industrial take-up historically reflecting the fact they are both key centres in East Herts and in the case of Bishop's Stortford its close proximity to the M11. [Pages 28-29]

The ratings for all of the employment sites that were subject to appraisal in the town for the study are:

- Goodliffe Park, Stort Valley Industrial Estate & Birchanger Industrial Estate (Green)
- Millside Estate (Green)
- Southmill Trading Centre (Green)
- Stortford Hall Industrial Park & The Links Business Centre (Green)
- Woodside Industrial Estate (Green)
- Raynham Road/Dunmow Road Industrial Estate (Amber)
- Twyford Road (Amber)

East Herts Economic Development Strategy 2007 – 2012 (East Herts Council, 2007)

The following text is copied from pages 14-15 of the strategy. The town is currently a minor sub-regional centre but is in the process of major change through the re-development of a number of sites. The town is developing from a traditional market town to a larger settlement with a greater sub-regional significance. The current redevelopment might be disruptive in the short-term but will provide medium to longer –term benefits for the town.

Bishop's Stortford is close to Stansted Airport and in a good position to develop economic opportunities related to the airport including services to visitors. The market town feel and rural setting make the town an attractive place to visit. The availability of employment land and business premises is a key challenge for the future. There is a need to identify sites for commercial development. New housing will bring an increased population to the town. The towns economic viability will be partly determined by how many new residents will commute elsewhere and how many can work locally. It is critical to identify sufficient space to facilitate high value jobs for the town.

Marketing and Inward Investment are important to ensure the competitiveness of Bishop's Stortford. Opportunities exist to attract new business but it is critical that sufficient employment land and business premises are available. Comprehensive support services businesses in the start-up phase will play an important part in retaining skills within the town. Bishop's Stortford also has the opportunity to extend its evening economy offer and link this to an emerging cultural quarter in the town.

The strategic coordination of the re-development is of primary importance in planning a prosperous future for Bishop's Stortford. East Herts Council is well positioned to develop this process and to identify the partners and key stakeholders that must be involved.

Hertfordshire Strategic Employment Sites Study (Regeneris, 2011)

The study suggests that the potential strategic significance of Bishop's Stortford is related not to existing sites/ economic activities, but to its location adjacent to the M11 mid-way between London and Cambridge and immediately adjacent to Stansted Airport⁷. Employment in Bishops Stortford is concentrated within / around the Town Centre, on the north side of the town on Stansted Road (Birchanger Industrial Estate, Stort Valley Industrial Park) and at the Rainham Road Industrial Estate and Stortford Hall Industrial Park, on the A1250 Dunmow Road. The latter is the largest employment location.

"The opportunity to deliver a new modern business park warrants further consideration. Any such site would need to be well connected to the M11 and existing facilities...The offer in our view needs to be considered in relation to existing employment locations in Harlow. Harlow is primarily a manufacturing/ industrial and warehouse location, but does have a stronger developed office

⁷ "Stansted Airport is the only London airport with space and permission to grow. It is also the most modern." (Page 94).

market. The opportunity at Bishops Stortford would be to develop an employment offer which is complementary to this, and linked to the proximity and potential growth of the Airport....There is a lack of existing critical mass of employment space; however the potential for additional employment development at Bishops Stortford should be kept under review, particularly related to prospective growth at Stansted Airport and housing growth at the town.”⁸

Constraints listed include capacity at Junction 8 of the M11, Green Belt, and lack of suitable identified sites. The assessment concludes that Bishops Stortford might be considered for a sub-regional business park over 30 hectares⁹ in the medium/ long-term and that this should be considered through the Local Development Frameworks of East Herts and Uttlesford Districts.

Retail and Town Centres Study (Chase & Partners, 2008)

According to the study there are 272 retail and service units in the town centre, including 16 convenience units equating to 6% of the total, which is below the national average of 9%. However, this includes the large Sainsburys and Waitrose stores. There are 132 comparison units representing 49% of the total, which is roughly in line with the national average of 46%, as is service provision. There are 19 major retailers and 67 multiple retailers. The vacancy rate of 10% is the same as the national average.

Bishop’s Stortford has greater growth potential than any of the other East Herts towns, with opportunities including possible town centre extensions at the Waitrose car park and the Goods Yard/Mill site, and intensification of existing areas of the centre. Major operators view Bishop’s Stortford as a viable and desirable trading location. The quality of the physical environment is generally very good, including the Market Square and the covered shopping centre at Jackson Square.

The study recommends a number of policy designations in order to ensure the long-term continued vitality and viability of retail in Bishop’s Stortford.

Firstly, designation of Bishop’s Stortford as the ‘Principal Town Centre’ within the retail hierarchy is suggested. The town has a significant retail offer in all sectors, including comparison goods. The town benefits from the presence of national retailers such as Argos, Boots, Sainsbury’s, Waitrose, Clarks, Dorothy Perkins and Waterstones as well as a full complement of banks and building societies. However, the town does lack major attractors of comparison retail expenditure such as a department store (the Pearsons store is somewhat limited compared to Debenhams or John Lewis).

The second proposed policy designation relates to the Thorley shopping centre which is the only location in the District recommended for designation

⁸ Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011), Page 95

⁹ The definition of strategic mixed-use employment (sub-regional) sites is provided on page 80 of the study. The summary table on page 103 explains that Bishop’s Stortford could host a suitable sub-regional business park, if a suitable site can be identified.

as a District Centre within the retail hierarchy. This should enable the Council to resist out-of-centre retail proposals which might harm the centre, which includes a cluster of small shops around Sainsbury's.

Finally, a town centre boundary for Bishop's Stortford is recommended in order to facilitate a sequential approach to retail development whereby proposals in central locations can be accorded priority in order to reinforce the vitality and viability of the town centre. The proposed boundary extends the current perception of the town centre area across the river to include the northern part of the Goods Yard, the railway station, and the Mill Site, as well as the Causeway car park. A 'pedestrian circuit' is suggested to encourage footfall within this enlarged town centre.

Flooding and Water Infrastructure Documents:

Strategic Flood Risk Assessment (2008)

The River Stort flows through Bishop's Stortford. Hydrological modelling has established the extent of Flood Zone 3 (High Risk), and Flood Zone 2 (Medium Risk), and Flood Zone 1 (Low Risk). There are extensive areas of Flood Zone 1 around the town within the bypass/M11. Flood Zone 2 and 3 is concentrated along the main river, with a particularly extensive area between the railway line and Hallingbury Road to the south of the town. The Stort floodplain is identified as a possible area for natural flood storage measures combined with wetland enhancement.

Infrastructure Documents:

Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

The study provides useful information and estimated costs for most of the major types of infrastructure required to support growth. It covers the functions of Hertfordshire County Council (highways, education, children's services, libraries, fire and rescue, waste disposal), the District Council (open space, sport and recreation, waste collection), other public sector agencies (NHS, police, ambulance service) as well as private sector infrastructure providers (gas, electricity, water supply and sewerage). It was not possible for the study to specify new items of infrastructure in particular locations, and therefore it is understood that this work will need to be undertaken alongside the emerging District strategy.

Transport Documents:

Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009) had the objective of providing a means by which the partners could prioritise and bid for infrastructure 'interventions' (schemes, 'soft' measures or initiatives).

The majority of interventions listed within the document are linked to locations outside the district; however, in respect of East Herts specifically, a few areas to be addressed in Bishop's Stortford itself, or for routes/services leading to it, have been identified. The issues raised include:

Rail:

- During AM Peak some passengers have to stand when boarding at Bishops Stortford and passengers cannot board the train due to overcrowding on some trains at Broxbourne;

Road:

- The A120 was considered to have serious problems of congestion. The A120 strategy would see the widening of the existing Bishops Stortford bypass if traffic levels require it, although this would be the last stage of a traffic management plan for the corridor between the A10 and M11
- The County Council's long-term aspiration for dualling of the A120 north of Bishop's Stortford was noted.

Bus:

- The 510 service Harlow – Bishop's Stortford – Stanstead Airport and the 308 fromk Bishop's Stortford to Stansted Airport were considered amongst the 20 best candidates for improvement in the County
- County Council proposals for improvements to Bishop's Stortford Bus Station were noted

Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)

This document was produced by Hertfordshire County Council as Highways Authority. The document does not mention specific schemes in Bishop's Stortford; however, it does include the Little Hadham Bypass as one of three named 'Major schemes' in the County. This is explained in Volume 2: Policy as follows:

For the Primary Route Network, the county council's aim is to complete the strategic east-west routes to enhance links within the East of England Region. The county council intends to make improvements to the A120 around Little Hadham. This scheme will divert the Primary Route Network link to the A10 away from Little Hadham, bringing much needed environmental benefits to the village and relieving a major bottleneck including for traffic travelling to and from Stansted Airport . [Pages 56-7]

Volume 3: Implementation continues:

"The Little Hadham Bypass on the A120 will relieve congestion at a signalised junction in the village on the Primary Route Network. This will reduce traffic levels moving through the village, thereby reducing severance and accidents, and improving air quality and noise conditions. The road will be single carriageway in keeping with the standard of the current route. The County Council has an agreed preferred route for the scheme. When funding opportunities emerge, the next stage will be to develop a business case and undertake more detailed economic and environmental evaluations."

According to the 20 year programme in Volume 3, the Little Hadham Bypass is estimated to be built in 2019-2021. Schemes for the second half of the programme (2021/22 – 2030/31) will emerge once national priorities and funding mechanisms become clear, and as district Local Development

Frameworks setting out future land use patterns are completed. It is expected that the developing Local Enterprise Partnerships will also influence future transport proposals.

Bishop's Stortford Transport Study (Steer Davies Gleave, 2006)

This study was prepared as a result of a recommendation in the Bishop's Stortford Masterplanning Study for a "town wide transport, movement and parking strategy that is integrated with a strategy for the improvement of the public realm to the benefit of pedestrians and cyclists" [Paragraph 1.4]. The strategy aims to "minimise the negative effects of additional demand generated by future growth and associated new development in the town" [Paragraph 1.5]. The study notes that "at the present time, the ASRs are considered to be an appropriate development site to absorb some of the additional housing allocated to the town although it has been acknowledged in the Master Planning study that no development could take place on this site before a comprehensive strategy was implemented to resolve some of the current transport problems in the town centre" [Paragraph 5.43]. The study noted that much of the traffic congestion is generated by relatively short distance cross-town trips. The main components of the strategy are:

- *Highway supply*: upgrade A120, improve capacity of town centre junctions (especially Hockerill); Dane Street 2-way, Goods Yard link road;
- *Bus supply*: improved bus interchange, improved frequencies;
- *Demand management*: consider park and ride, discouraging long-stay parking, better walking and cycling provision.

Bishop's Stortford and Sawbridgeworth Urban Transport Plan (forthcoming)

Work on this document will be progressed once the draft strategy for East Herts is available, in order that the impact of future development may be factored in to the plan. Work on the document will be lead by Steer Davies Gleave, commissioned by Hertfordshire County Council with East Herts Council as a key partner.

Sport and Leisure Documents:

PPG17 Audit and Assessment (PMP, 2005)

This study, involved an assessment of local needs and an audit of open space and indoor sport and recreational facilities, across the whole of East Herts to provide a clear vision and priorities for the future based on local need.

In terms of Bishop's Stortford, there are a number of specific findings, of which some of the important issues raised are discussed below.

- Grange Paddocks is considered a well used facility providing sports provision for the area. It was noted that the facility provides good parking and the sports pitches are of good quality for matches
- Red, White and Blue has good signage for local walks and is well maintained
- Thorley Wedge is well used by the local community and is considered an important visual break in the built environment. It suffers from some

littering but is generally considered to be a good recreational area and is used frequently by dog-walkers

- Southern Country Park – some users commented on the fly-tipping at the site
- Bishops Park suffers from some misuse, for example, Motorbike usage. The site needs some maintenance as it is felt that the equipment is in poor condition
- Northolt Avenue site suffers from intermittent graffiti and some anti-social behaviour and it was noted that the boundary fencing is in need of repair there are on-going problems with anti-social behaviour and vandalism in the vicinity of Thorley Community Centre. It was suggested that a better mix of facilities to encourage a range of age groups may help to ease the problem at Castle Gardens and Town Meads some users felt isolated when using the Town Meads, despite being close to housing areas. However, it was generally considered to be a well maintained area with good amenities, e.g. litter bins
- the skatepark is not considered to be well lit and, therefore, not felt to be safe after daylight hours. Improved lighting may increase accessibility to the facility and enhance security and safety
- the Firs is considered to be a very valuable amenity green space. It is a large site for the area and accommodates informal recreation including dog walking and play. It is considered an important resource for the community due to its location and size. There is intermittent littering, but it was commented that this is generally cleared quickly.

It should be noted that, given the length of time that has elapsed since the study, some of the findings may not necessarily hold true today, especially those of a site specific nature, where measures may have been undertaken to address deficiencies.

East Herts Assessment of Sports Facilities (East Herts Council, June 2011)

This Assessment undertook a review of the current state of indoor and outdoor sports facilities in the district and proposed local planning standards, as appropriate.

This Assessment shows that East Herts is well served by a range of high quality, indoor and outdoor sports facilities. In general, residents are currently satisfied with the sports and active recreation facilities on offer. Particular issues raised for Bishop's Stortford specifically in the report show that:

- Grange Paddocks Leisure Centre is owned by East Herts Council and includes a 5-lane swimming pool and gym;
- In addition a number of secondary schools within the town make their facilities including sports halls and swimming pools available for community use at limited times;
- There are a number of privately operated health and fitness centres in the town;

- Rugby Pitches at Bishop's Stortford RUFC, Bishop's Stortford RUFC (Fire Bridgade) are overlapped on a weekly basis (due to juniors playing on senior pitches).

The East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

There is a significant demand for junior and mini football and rugby facilities in the M11 Stort Corridor (including Bishop's Stortford and Sawbridgeworth. This level of demand reduces for adult players resulting in a slight over-supply of adult facilities. In the short term, one option to redress these demand and supply issues is to realign adult pitches into a junior pitches. However, this approach prevents an effective management programme for pitch rotation, i.e. allowing pitches to rest periodically to prevent over-play and damage to popular pitches. The longer-term approach would be to facilitate more community use of education facilities and the creation of a new multi-pitch facility providing for a range of users. An issue for all football and rugby clubs across the district is the lack of a suitable home ground. The District's football and rugby clubs field many teams which cannot all be accommodated on their home grounds thus resulting in the over-use of public pitches for training and match events. A purpose-built facility used as a 'home ground' would reduce this informal use and enable clubs to apply for funding for development.

The strategy indicates a deficiency of cricket pitches across the area. Increased use of school pitches and the creation of a multi-pitch site are two suggestions made to address this deficiency. Hockey is also identified as having a deficiency of Synthetic Turf Pitches (STPs) in the area.

Proposals to relocate two secondary schools in Bishop's Stortford are unclear as yet regarding the overall changes to the pitch stock. This could provide significant opportunities for higher quality and more accessible pitches in the area, including STPs.

Another potential solution for the M11 Stort Corridor area is to secure community access to the Jobbers Wood Playing Fields to the west of Bishop's Stortford which currently has restrictive conditions preventing non-school use.

Green Infrastructure Documents:

East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

The analysis indicated a need to re-link areas of the landscape due to severance and fragmentation of landscape structure as a result of the bypass at Bishop's Stortford. There is an opportunity to reconnect areas of woodland to enhance perception of tranquillity and settlement approach to the north and west of the town. A key opportunity is to extend wetland vegetation and wet woodland habitat to enhance settlement edge/interface with valley at this point and to consider this as part of proposals for access links in the Stort Valley Park proposed in the Harlow GI Plan. Enhancing access to settlements from the river valleys across the District (e.g. improvements to Rivers Nursery Site on the western edge of Sawbridgeworth) could improve settlement approaches. To the east of Bishop's Stortford within Essex, expanded woodland planting could re connect Hatfield Forest and provide attenuation in relation to the M11 interchange. [pages 10-11]

Future development in Hertford and Ware, and Bishop's Stortford could place further abstraction pressures on the Lee, Ash and Stort Rivers, further heightening the need for positive management of the river network and appropriate wetland expansion. [page 16]

Project 2: Stort Valley and Countryside Links

RURAL WILDSpace - Brief description / snapshot of the project:

- Recognising and valuing the rural landscapes in and around the Stort Valley and encouraging sustainable management of aspects of the habitat mosaic e.g. grassland and ancient woodland plus enhanced woodland and wet woodland linkage
- Enhanced pedestrian access and habitat links from the Stort Valley and Harlow to local GI sites of interest (Rivers Nursery Site, Lee Valley and river network) plus wider farmland landscape

Project 4: Lateral links

RURAL GREEN LINK - Brief description / snapshot of the project:

- Enhanced off-road strategic green access link (pedestrian and bridleway links) between both settlements to tie together Hertfordshire Way and Harcamlow Way with the dismantled railway line running north/south along the Rib and Ash valleys
- Providing additional loops for walkers to enable enhanced recreational/commuting links between Stevenage and Bishop's Stortford and to the Green Arc (link with the Hatfield Forest)
- Project provides scope for greater interpretation of historic elements of the District such as the Roman Road east of Stevenage as part of the route
- Urban and countryside links create a series of waterway loops which provide important off road access between larger settlements – promotion of a sustainable transport network
- Link to wetland enhancement e.g. mirror the quality of wetland environment south Braughing (River Quin) and buffer planting along roads to reduce intrusion and connect landscape elements (woodland/grassland)
- Link to Project 3 River Valleys (create a series of recreational loops across the District).

Issues and Options Consultation Feedback (autumn 2010)

The Issues and Options consultation brought forward many comments regarding the future growth of Bishop's Stortford and also views on preferred development density. The following section details the pertinent points of the many representations, but, due to the purpose of the consultation having been to elicit representations of a strategic nature, it does not report those elements of submissions relating to the promotion of specific individual sites.

Representations received from specific consultees included the following points:

Bishop's Stortford Town Council supports limited, high quality development on sites within the existing urban area. It does not support development of the ASRs, which would undermine quality of life in the town. The Town Council believes that the town is at or near its natural capacity, and is concerned that

solutions to existing congestion and air quality problems, for example at Hockerill junction, have not yet been proposed. The Town Council does not support any of the growth options indicated in the consultation document, and is concerned that there should be a balance of residential and commercial development, and the provision of adequate infrastructure to deal with growth in neighbouring districts, for example 650 dwellings at Forest Hall Park and 800 dwellings at Takeley. The Town Council believes that Bishop's Stortford has taken a disproportionate share of the housing burden in recent years, driven by Government policy to provide housing close to Stansted, and therefore the District strategy must re-balance the burden across the district having regard to this recent history. The Town Council supports high quality town house style development of 3-4 bedroom dwellings within the urban area, and would like to see a rebalancing away from the recent over-provision of 1 and 2 bedroom flats.

Bishop's Stortford Civic Federation suggested that there is a limit to the town's ability to take many more houses beyond those already planned at the Goods Yard. To do so would destroy the very things that make the town an attractive place to live in. Like the Town Council, the Civic Federation believes that Bishop's Stortford has taken a disproportionate quantity of development in recent years. The most important issue is in relation to traffic congestion, and the Civic Federation request that transport modelling should be re-run in light of proposed developments in Essex as well as the town. A 'People's Vision' was submitted through the consultation, which focuses on maintaining the character of the historic market town, and addressing traffic congestion issues.

145 standard responses were received which stated:

"In the case of Bishop's Stortford none of the options is suitable. The strategy proposals for at least another 4,000 homes, with most on the Area of Special Restraint and the Green Belt is unacceptable".

Uttlesford District Council drew attention to concerns about pressure on Junction 8 of the M11, which also provides access to the B1383 which links numerous villages in Uttlesford.

Uttlesford District Council, Birchanger Parish Council, and Stansted Parish Council objected to Options 2 and 4, which appeared to show development options in Uttlesford District. Uttlesford Council's response stated that *"If East Herts District Council decide to pursue options for which involve development in Uttlesford this will be vigorously opposed by Uttlesford District Council as there are more appropriate locations within East Herts District to accommodate this growth."* On this same point, Essex County Council stated that *"the County Council strongly recommends that East Herts should work collaboratively with Uttlesford District Council and Essex County Council regarding cross border spatial issues and challenges."*

Farnham Parish Council expressed concerns over any development around the junction of Farnham Road and St Michaels Road/Rye Street as this will become a major congestion area with current infrastructure.

Sport England supported the vision, but stated that the implications of the Playing Pitch Strategy should be addressed, including the need for additional playing pitches to address deficiencies in the town: *“e.g. the need for additional playing pitches would justify new sites being identified for outdoor sport and/or major new development should incorporate outdoor sports provision.”*

Residents raised a number of concerns including noise and pollution near the M11, ribbon development, preservation of the countryside, Green Belt, infrastructure, traffic congestion, and crowded trains. Concerns were raised about Birchanger Wood. It was also suggested that the bypass should be extended to join up with the M11. One resident expressed concerns about pressures on Junction 8 of the M11, which is one of the few junctions that also serves the B1383 which links numerous villages in Uttlesford, as well as serving Birchwood School and Raynham Road employment area. One resident stated that that no more flats should be provided for Haringey and other Inner London Councils. Consideration should be given to the redevelopment of the South Street/Anchor Street area. Several comments were received relating to the issue of density, suggesting that because density and design are closely related, density can only be determined on a site-by-site basis. Density between the centre and the fringe of the town should vary, reflecting local character. Concerns were expressed about the high density of recent development on brownfield sites within the town, particularly in terms of flats.

A number of responses were received from different departments within Hertfordshire County Council. Herts Property promoted a new secondary school site to the south of the town at Whittington Way. The Passenger Transport Unit stated that Hertfordshire Highways are currently commissioning work on traffic modelling in Bishop's Stortford to examine the feasibility of an urban traffic control system for the town centre. This model will enable accurate analysis of traffic flow and signal optimisation requirements and would also facilitate the effect of future proposed development and associated measures to be tested. It also stated that higher density development is more likely to be financially viable.

Stansted Airport Ltd stated that the opportunities presented by the airport should be considered as part of the vision for the town. It was stated that aircraft noise should be considered in relation to options 3 (to the east) and option 4 (south east) as much as option 5 (to the south). The response states that *“Stansted has planning permission to grow to serve 35 million passengers per year and 274,000 total aircraft movements. Despite the current downturn in air traffic at the airport these levels are expected to be reached during the plan period. Having checked the current and future forecast air noise contours it is evident that some of the land within areas to*

the east and southeast of Bishop's Stortford currently and in the future are predicted to be exposed to levels of noise of 60dBA and higher, whereas land to the south (Option 5) would be exposed to lower levels. STAL therefore consider that options to the east and south east which would lead to residential development in areas exposed to noise levels exceeding 60dBA Leq should not be taken forward."

Stop Stansted Expansion opposes development in the Green Belt around the town.

The Environment Agency drew attention to requirements for a sequential approach to flood risk assessment, and stated that Options 2, 3, 4 and 5 are in Flood Zone 1 and are therefore suitable options. It was noted that certain parts of the built-up area lie within Flood Zone 2 and 3 and are therefore least preferred.

In respect of development density it was noted that with higher density development, if development in the floodplain cannot be avoided, this would place a higher density of people living in areas at risk of flooding. However a higher density of development may involve the use of less land for development and thus be easier to avoid flood risk areas. Lower density developments will require more land take increasing the likelihood that development will occur in areas at risk of flooding.

The Agency further considered that the vision should state that development in the flood plain should be avoided would benefit from a direct reference to managing flood risk and using new development to contribute to reducing existing flood risk wherever possible.

Natural England supported the emerging vision for Bishop's Stortford.

Epping Forest District Council suggested that allocating development in Bishop's Stortford would alleviate pressure elsewhere.

Other Comments

One response suggested that there may be areas of unstable land in the area of the Bishop's Stortford bypass, and geophysical surveys should be conducted to establish that the land is safe.

Buntingford

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written

has been taken into account where documents have been used to inform the Council's emerging strategy.

The second part sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

The documents in the first part of this section have been grouped as follows:

Town/Community Documents:

- Buntingford Town Plan (Buntingford Town Council, 2012)
- East Herts Sustainable Community Strategy (East Herts Council, 2009)

Sustainability Documents:

- Sustainability Appraisal Scoping Report (Scott Wilson, 2010)
- Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Housing Documents:

- Strategic Housing Market Assessment (ORS, 2010)
- Population and Household Forecasts - Parish Groupings and Towns (Edge Analytics, 2012)
- Accommodation Needs of Gypsies and Travellers in Northern and Eastern Hertfordshire, Stage Two: Identification of Potential Areas to Accommodate Gypsy and Traveller Pitches in the Study Area (Scott Wilson, October 2007)

Land Availability Documents:

- The Strategic Land Availability Assessment (East Herts Council, 2012)

Economy Documents (Employment/Retail):

- Employment Land and Policy Review (Halcrow, 2008)
- East Herts Economic Development strategy 2007- 2012 (East Herts Council, 2007)
- Retail and Town Centres Study (Chase & Partners, 2008)

Flooding and Water Infrastructure Documents:

- Strategic Flood Risk Assessment (East Herts Council, 2008)

Infrastructure Documents:

- Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

Sport and Leisure Documents:

- PPG17 Audit and Assessment (PMP, 2005)
- East Herts Assessment of Sports Facilities (East Herts Council, June 2011)
- East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

Green Infrastructure Documents:

- East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

Town/Community Documents:

Buntingford Town Plan (Buntingford Town Council, 2012)

The draft Buntingford Town Plan has been published for comment. It seeks to provide guidance on the challenges facing the town to 2031 and replaces the previous Town Plan dating from 1986. The plan accepts that development which would benefit the community as a whole was necessary but large scale development of sites should not be permitted and 'eco' built homes with adequate space for each unit should be encouraged. The vision seeks to ensure that the town retains its character and develops over the next 21 years and beyond as a 'living town' that will be there for the benefit of future generations. The plan contains specific policies on housing, traffic and transport, economic development, community amenities and facilities, health, education and crime and safety. In summary, these include:

- *Housing* - to prevent growth which would harm the town's rural charm and character by favouring sustainable development on the former Sainsbury's Depot followed by sustainable development to the East of the town; favouring development at a range of densities; supports the use of developer contributions; ensuring that there is a proper balance of house types and sizes; seeking to maintain the open space in and around the existing town boundary; supports the continuing use, retention and preservation of historic buildings; encourages the imaginative development of the High Street to create an attractive, inviting and viable shopping area; supports sustainable growth in the population.
- *Traffic and transport* - to increase the provision of public transport from the surrounding villages into Buntingford and encourage improvements to the number and destination of local transport services during peak times.
- *Economic development* - to promote the economic well-being of the town and improve the High Street for the shopper; support the continued growth of varied light industry; encourage the provision of careers and employment advice for the young people; continue to support the weekly Charter Market; encourage tourism and maintain a Tourist Information Service and supports the provision of Bed and Breakfast accommodation in the town.
- *Community amenities and facilities* - seek to ensure that all existing facilities are retained and expanded to meet future needs; encourage the improvement of the environment of the River Rib and that water is not over extracted upstream of the town; encourage maintenance and management of rights of way; continue to support an established Post Office in the town centre and actively supports the installation of fibre connection cables for the provision of High Speed Broadband; support existing statutory, community and voluntary services as well as provision of facilities to help the disabled; and seek greater provision of outdoor sports facilities and the retention and the enhancement of all existing facilities.
- *Health* - support the continued provision of medical and health facilities in the town.
- *Education* - maintain close links with all local schools.

- *Crime and safety* - will maintain a peace-time emergency plan actively engage with the local Police personnel, sit on the East Herts Community Safety Partnership and support the Fire and Ambulance Services in the town.

It is also possible that the draft Town Plan could be reworked as a Neighbourhood Plan in due course.

East Herts Sustainable Community Strategy (East Herts Council, 2009)

The East Herts Sustainable Community Strategy was aligned with the preparation of the Issues and Options Consultation. It sets out a number of shared ambitions that together, the Local Strategic Partnership (LSP) will seek to achieve. It notes that Buntingford is currently the smallest town in East Herts but is surrounded by an extensive rural hinterland and functions as an important rural service centre.

Sustainability Documents:

Sustainability Appraisal Scoping Report (Scott Wilson 2010)

Explanation of the Council's approach to sustainability appraisal is explained in Section 1.12 of this Supporting Document. The views of a number of consultees on a draft of the Scoping Report were sought, including Buntingford Town Council, Buntingford Civic Society, Buntingford Chamber of Commerce and Buntingford Relief in Need.

The Scoping Report established a Sustainability Appraisal Framework including spatial areas and nine assessment topics. Six 'Spatial Areas' were identified as a planning tool to facilitate consideration of the strategic planning functions of different parts of the district. Broadly, these were based on Housing Market Areas plus consideration of additional functional relationships. Buntingford is listed as one of two Rural Service Centres (RSC).

The Scoping Report sets out what the situation is now, what it would be without the plan and the key issues for the appraisal. In terms of the key sustainability objectives that need to be considered in respect of RSC, they are:

- Conserve, restore and enhance the region's natural and built environment
- Move goods and people sustainably
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all

In terms of the current situation, Buntingford has a population of 5,000 and is surrounded by open countryside on the River Rib. The centre of the settlement was improved in the late 1980s by the opening of the A10 bypass and through a programme of enhancement works. With respect to passenger transport, a limited local bus network exists from Buntingford to and from Stevenage, Bishop's Stortford, Hertford, Ware, Hitchin, Royston, Harlow and villages surrounding Buntingford. Along with Ware and Sawbridgeworth, Buntingford tends to exhibit more traditional market town characteristics however; it is unusual in East Herts in that it is not located close to other

towns and therefore assumes greater relative importance within the district as a service centre to the rural hinterland.

The town centre retail offer includes two supermarkets as well as a range of independent and specialist shops. Catchments for food shopping in East Herts tend to be less extensive than for non-food shopping and Buntingford retains a significant amount considering its size. The survey of businesses shows that there are perceived weaknesses in the accessibility of the town, both through inadequate public transport and car parking. The study concludes that Buntingford *“fulfils its role in the retail hierarchy and its both vital and viable.”* Buntingford includes an employment cluster at the Sainsbury’s Deport which is 9ha. Buntingford Business Park is located directly on the A10 and is a new development with large, high-quality units. Park Farm industrial estate provides smaller, older units that cater for smaller businesses. Buntingford has a relatively low proportion of people in professional (11.2%) and associate professional / technical occupations (13.3%) and a relatively high proportion of process, plant and machine operatives (6.7%) and people in elementary occupations (10.4%). Almost a fifth of people (aged 16-24) are in managerial/senior official occupations (19.7%).

Without the plan there is a danger that the vitality of Buntingford may be diminished as a response to high levels of growth elsewhere in the region and the district. This could lead to the closure of local services, causing residents to travel further to meet their everyday consumer needs. Additionally, without the plan it may not be possible to support / manage appropriate levels of growth within RSCs, thereby leading to diminished character within these areas.

In light of the information above, key issues to take into account in the appraisal in relation to the RSCs include:

- 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 settlements

The Scoping Report also addressed a number of assessment topics. The key messages in the Scoping Report in relation to Buntingford are:

- Air Quality – Ozone is monitored at Throcking, near Buntingford and the objective level has been exceeded on several occasions. East Herts Council will continue to monitor air quality at this location.
- Biodiversity - 10 Key Biodiversity Areas have been identified within East Herts and, in the general Buntingford area, this includes the Rib Valley.

- Climate Change and Flood Risk - river flooding is of concern in the river corridors through all the major settlements in the district, including Buntingford. Additionally, recorded surface water flooding incidents appear to be isolated, although multiple incidents have been recorded in central Buntingford. The SFRA provides several observations in relation to the impact of flooding on critical infrastructure including Sewerage Treatment Plants (SWTs), hospitals, fire stations, GP surgeries and ambulance stations. SWTs are typically located within the flood plain because of the requirement for gravity to convey effluent. The risks associated with flooding of sewage treatment include contamination of the drinking water supply and water-borne diseases. Within East Herts SWTs identified as being at risk include the River Rib at Buntingford.
- Health and Wellbeing – no comments specific to Buntingford, and the issues addressed are covered in Chapter 2 of the Supporting Document.
- Economy and Employment – no comments specific to Buntingford, and the issues addressed are covered in Chapter 2 of the Supporting Document.
- Historic Environment – most of the issues are addressed in Chapter 2 of the Supporting Document. However, the study also notes that there is a heritage centre in Buntingford.
- Housing – no comments specific to Buntingford, and the issues addressed are covered in Chapter 2 of the Supporting Document.
- Land – no comments specific to Buntingford, and the issues addressed are covered in Chapter 2 of the Supporting Document, and the Green Belt topic assessments.
- Landscape – no comments specific to Buntingford, but draws attention to the need to address fragmented landscapes, including features such as hedgerows.
- Transport – No findings specific to Buntingford; however, housing growth appears to drive higher projected traffic growth in East Herts than in other districts within the County.
- Water – most of the issues are addressed in Chapter 2 of the Supporting Document. However, the study also notes that the River rib has poor ecological quality and the Environment Agency’s general classification for the area is a major aquifer. Other parts of Hertfordshire are classed as non-aquifer. Major aquifers are very sensitive to potential pollution.
- European Sites – this relates to the European Habitats Directive. This will be assessed in Chapter 5 of the Supporting Document.

Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Sustainability Appraisal of the Issues and Options Consultation document was undertaken using the SA Framework established by the SA Scoping Report. The Issues and Options document was a discussion paper and simply sought comments on a number of alternative approaches rather than proposing actual development options. Therefore the appraisal was inevitably high-level.

In terms of the appraisal against the six spatial areas, it was noted that in the Rural Service Centres, 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. 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. 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.

From the appraisal of the development strategy and the SA sets out recommendations to help mitigate some of the effects. For the Rural Service Centres, it recommends that 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.

In terms of the growth options for Buntingford itself (1: Existing Built-Up Area; 2: South and West; 3: North; 4: Northeast; and 5: East), assessed against the SA Topics, the SA concludes the following:

- **Biodiversity and green infrastructure** - 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)** - 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** - 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)** - 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)** - 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. 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** - 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** - 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** - water scarcity within the East of England means that any level of development will place additional pressure on water resources.

In terms of mitigations specific to Buntingford, the SA recommended that:

- **Biodiversity and Green Infrastructure**
 - 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**
 - 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** - an agricultural land survey could be undertaken to ensure that the lowest quality land is brought forward for development
- **Landscape** - development should avoid growth to the east in order to minimise potential negative impacts on the area's landscape character
- **Transport**
 - 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** - strong policies are required to minimise water use and maximise water efficiency

Housing Documents:

Accommodation Needs of Gypsies and Travellers in Northern and Eastern Hertfordshire, Stage Two: Identification of Potential Areas to Accommodate Gypsy and Traveller Pitches in the Study Area (Scott Wilson, October 2007)

This technical study covering the whole of northern and eastern Hertfordshire sought to find potential areas in which pitches could be provided to meet the accommodation needs of Gypsies and Travellers. Within East Herts the study identified seven broad areas of search for further investigation, including locations in Buntingford. In reaching these findings the study took account of issues such as distance from services, environmental designations and the Green Belt, as well as site specific criteria. However, the recommendations in the report have not been endorsed by the Council at this stage and consideration would need to be given to an updated assessment of need, land availability, planning applications submitted in the interim, sustainability criteria, and the potential for large-scale development opportunities to aid delivery. It will also be important to ensure that any new sites have the potential for successful integration between traveller and settled communities.

Strategic Housing Market Assessment (ORS, 2010)

Buntingford is located within the A10 Corridor Housing Market Area which also includes the towns of Broxbourne, Cheshunt, Hertford, Hoddesdon, Ware, Waltham Abbey and Waltham Cross. Further to the north, however, the town of Royston lies within the Cambridge housing market area. The housing market area reflects existing functional linkages between places where people live and work and their demand and preferences for housing.

Within the housing market area as a whole, the study concluded that an affordable housing requirement of 58.2% would be required to 'balance' the housing market.

Population and Household Forecasts - Parish Groupings and Towns (2012)

This technical work generates a number of different demographic scenarios at the Sub-District level, including for each town. Whilst this information does not provide the 'answer' to the level of housing growth in a particular area, it can be used as the starting point for plan-making purposes that provides an indication of the level of housing required that then needs to be tested against planning policy, physical and environmental considerations. It may be the case that, in planning terms, a particular location cannot accommodate the level of development required to meet its housing needs. Equally, there may be valid planning reasons why a particular location should accommodate more than its forecasted growth. The following outputs were generated for Buntingford:

Scenario	Household 2010 - 2033 No.	Change %	Average Dwellings Per Year	20 Year Total
Buntingford Town				
Sub-National Population Projections 2010	382	18.9	17	340
Nil-Net Migration	244	12.1	11	220

Natural Change	249	12.3	11	220
Migration-Led	333	16.5	15	300
Completion Rate - 10 Year Average	278	13.8	12	240
Buntingford and Central Northern Parishes				
Sub-National Population Projections 2010	516	13.8	23	460
Nil-Net Migration	463	12.4	20	400
Natural Change	457	12.2	20	400
Migration-Led	423	11.3	19	380
Completion Rate - 10 Year Average	444	11.9	20	400

Land Availability Documents:

Strategic Land Availability Assessment (East Herts Council, 2012)

The SLAA considers the likelihood of sites coming forward for development within the built-up areas of the Six Main Settlements and Category 1 Villages in East Herts. It assesses the availability, suitability and achievability of sites and was subject to stakeholder engagement in May/June 2012. For the built-up area of Buntingford the study concludes that at least 67 dwellings would be built over the plan period, including 37 in the next five years.

In September 2011, the Council initiated the SLAA Partnership to obtain feedback from stakeholders regarding deliverability of development and strategic planning from the perspective of the market. In respect of Buntingford, general comments included:

- Pattern of people moving up the A10 corridor; people sell in London, buy in Buntingford and commute back to London, and then on retirement sell again and move to Norfolk etc.
- Strong housing market - the high quality of schooling is driving people with children into the town.
- Incomers will always have greater economic power so if you under provide housing you will be excluding local people from the local market. Therefore, need to over provide to meet both the demand from London and from the local area.
- Problem with affordable housing not being integrated within new developments. Need affordable homes integrated with the community for low skilled workers.
- Should promote the district for larger housing which will bring in people with higher spending power. Should make some allocations for large, on off executive houses to attract people with higher spending power. This helps to increase the shopping offer in towns. This is already being seen in Buntingford.
- The housing numbers proposed would lead to a further strain on services. As the town doesn't have a railway line, people will be forced into their

cars to access services. This has implications for housing and employment.

- New employment opportunities must also be provided but the type of employment offer is changing: there used to be more high skilled jobs, pharmaceuticals etc.
- Royston has better links to the A1 etc. From Buntingford, the A120 needs to be negotiated to access the M11 and that has congestion issues.

Economy Documents (Employment/Retail):

Employment Land and Policy Review (Halcrow, 2008)

Buntingford has a range of employment sites that score positively overall in terms of their provision. There is a good mix of sites providing for both smaller, local needs as well as larger warehousing with good road access onto the A10. One of the largest employment sites in the district is the Former Sainsbury's Depot, which is considered to be an employment cluster because of its size (9ha). Whilst this site is designated for employment under Policy BUN5 in the East Herts Local Plan 2007, the policy accepted that in the event that employment use has been explored fully without success, alternative uses may be acceptable. However, an application has recently been submitted for a replacement distribution centre and continued employment use on the site.

The ratings for all of the employment sites that were subject to appraisal in the town for the study are:

- Buntingford Business Park (Green)
- Park Farm Industrial Estate (Green)
- Former Sainsbury's Distribution Depot (Green)
- Watermill Industrial Estate (Amber)

In terms of new employment provision, Buntingford should continue to provide employment land. However, it is considered unlikely that significant employment land opportunities exist in the urban area (of all towns) beyond those already in employment use. Therefore consideration will need to be given to new allocations as part of any urban extensions proposed.

East Herts Economic Development Strategy 2007- 2012 (East Herts Council, 2007)

This document was produced by the Council in order to help provide a framework for realising economic development goals.

In respect of the market town of Buntingford, the study notes that whilst it has a population of about 5,200, it is surrounded by an extensive rural hinterland with a combined population of around 14,000. Buntingford is unusual within the East Herts context in that it is not located close to other towns. It therefore is important as a service centre to the rural hinterland. The town centre retail

offer includes two supermarkets as well as a range of independent and specialist shops.

In terms of Rural-Urban Inter-Dependency, market towns are viewed as being both urban and rural – they are the main urban settlements within their local rural area. However, in a regional scale they tend to be perceived as rural in scale and nature. Buntingford tends to exhibit traditional market town characteristics.

Retail and Town Centres Study (Chase & Partners, 2008)

Buntingford's role as a smaller centre is to provide essential services and convenience goods shopping to its catchment, which, as is typical for towns of this size, consists of its immediate environs. At the time that the study, 49 retail and service units were identified including 6 convenience units equating to 12% of the total (slightly above the national average) and 15 comparison units representing 31% of the total and significantly below the national average of 49%. In contrast, 24 service units equating to 49% of the total were also identified and this is significantly above the national average. 4 units (8%) were vacant (below the national average). Whilst this year's retail frontage survey is still to be undertaken, the survey from 2011 confirmed a vacancy rate of 4 units.

This mix of uses is what you would expect given Buntingford's role closely akin to that of a district centre which should provide *“at least one supermarket or superstore, and a range of non-retail services such as banks, building societies and restaurants, as well as local public facilities such as a library. In addition to these, it is reasonable to include the services a local centre should provide, identified as a newsagent, sub-post office, a pharmacy and possibly a hot food take-away and laundrette.”*

Buntingford is served by two supermarkets, Budgens and Co-op 6,000 and 8,000 sq ft sales area respectively. The town is therefore well served in terms of convenience goods shopping. With regard to services there is a Barclays bank at High Street, a number of restaurants, two pharmacies, takeaways and a post office. Together, the two supermarkets account for 23% of expenditure. Stevenage and Bishop's Stortford are significant destinations, attracting 23% and 21% of expenditure respectively. Links between Buntingford and Bishop's Stortford are far weaker than those between Buntingford and Stevenage. Buntingford does not have a significant comparison goods offer and as such, the town retains a smaller proportion of shopping trips compared to the 3 main towns of Bishop's Stortford, Hertford and Ware, particularly for main food shopping.

The town therefore provides all of the necessary facilities. Furthermore, there are very few vacant units, a strong indicator of retail health. The survey of businesses shows that there are perceived weaknesses in the accessibility of the town, both through inadequate public transport and car parking. However, the quality of the shops is considered to be good and the appearance of the centre attractive. Therefore the town fulfils its role in the retail hierarchy and is both vital and viable.

Buntingford is a lower-order centre and does not have a significant comparison goods offer. As such, its retention of local comparison goods expenditure is minimal: 5%, an overall figure which is consistent through most of the goods categories. In terms of value, Buntingford has an estimated comparison goods turnover of £6m, most of which is generated by the sale of chemist goods through the dedicated pharmacies in the town (notably Lloyds Pharmacy) and the two supermarkets. The household survey results show that the principal destination is Stevenage. This captures 35% of the overall pool of expenditure in this zone, worth £34m. Bishop's Stortford attracts some further expenditure, worth £12m or 12% of the total available with Harlow and Welwyn Garden City attracting circa £5m each. Clearly, Buntingford's comparison expenditure is mostly leaking not only out of Buntingford, but out of the District.

Indeed, like Sawbridgeworth Buntingford must be viewed in the context of their much smaller size and more limited role. These towns are not and will never be significant comparison retailing destinations but provided they have adequate food stores and essential services, they fulfil their role. The study therefore recommended that Buntingford be designated as a 'Minor Town Centre'.

In terms of new development, the study concluded that there was potential to improve or extend existing foodstores by 236sqm (net) / 393sqm (gross). In terms of the policy approach, the study recommended that instead of primary and secondary shopping frontages, a town centre boundary should be identified. *"East Herts Council should resist any development which threatens the key uses underpinning the vitality of these towns, specifically the foodstores. Beyond this, any new retail scheme within the town centre or well related to it that might support the town's vitality and viability should be supported by policy."*

Flooding and Water Infrastructure Documents:

Strategic Flood Risk Assessment (East Herts Council, 2008)

In relation to Buntingford the Study notes that the River Rib flows through the town. Hydrological modelling has established the extent of Flood Zone 3 (High Risk), Flood Zone 2 (Medium Risk), and Flood Zone 1 (Low Risk). The majority of the town is within Flood Zone 1 with Flood Zones 2 and 3 concentrated along the River Rib, where as with all towns, flooding within the river corridor is of concern. In addition, there have been a number of recorded surface water flooding events in central Buntingford. Topic Assessment 10: Flood Risk includes a more detailed area-specific assessment, and this has been considered in the evaluation of the Buntingford Areas of Search (nos. 5-9) set out in Section 4.5.

Infrastructure Documents:

Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

The study provides useful information and estimated costs for most of the major types of infrastructure required to support growth. It covers the functions of Hertfordshire County Council (highways, education, children's

services, libraries, fire and rescue, waste disposal) the District Councils (open space, sport and recreation, waste collection), other public sector agencies (NHS, police, ambulance service) as well as private sector infrastructure providers (gas, electricity, water supply and sewerage). It was not possible for to study to specify new items of infrastructure in particular locations, and therefore it is understood that this work will need to be undertaken alongside the emerging East Herts District Plan.

Further to the main report, the Hertfordshire Infrastructure Investment Strategy (HIIS) Partnership commissioned a more detailed report to identify transport infrastructure and associated costs required as a result of targeted Regional Spatial Strategy (RSS) growth in Hertfordshire to 2031. The objective of the work was to provide a means by which the partners could prioritise and bid for infrastructure 'interventions' (schemes, 'soft' measures or initiatives).

The majority of interventions listed within the document are linked to locations outside the district and those within East Herts do not relate to Buntingford directly. Indirectly, however, the A120 route to Bishop's Stortford is highlighted.

Sport and Leisure Documents:

PPG17 Audit and Assessment (PMP, 2005)

This study, involved an assessment of local needs and an audit of open space and indoor sport and recreational facilities, across the whole of East Herts to provide a clear vision and priorities for the future based on local need. It should be noted that, given the length of time that has elapsed since the study, some of the findings may not necessarily hold true today, especially those of a site specific nature, where measures may have been undertaken to address deficiencies.

The study divided the district into sub-areas based on Wards. References to Buntingford, therefore, refers to most of the northern half of the district and includes the settlements of Benington, Braughing, Buntingford, Cottered, Furneux Pelham, Little Hadham, Walker and Westmill. As such, whilst there are a number of specific findings, they may not necessarily be true of the town of Buntingford on its own.

The study assessed different types of open space based upon amount of hectares available per 1,000 population. In respect of Parks and Gardens and provision for children and young people, below standards level of provision were identified. In respect of Amenity Green Space and outdoor sports pitches, above standards level of provision were identified. In respect of the latter, the pitches leased by Sainsbury's are considered a valuable resource for the town and are very well used, although it was considered that the sports pitches and multi-use games areas (MUGAs) in Buntingford were not as well maintained as other sports provision in East Herts.

Analysis of survey responses from each analysis area, indicate that Buntingford is within five minute accessibility standard of Natural and Semi-

Natural Green Space. In contrast, results from the other towns suggest that a 10 minute accessibility standard would be more appropriate.

East Herts Assessment of Sports Facilities (June 2011)

This Assessment undertook a review of the current state of indoor and outdoor sports facilities in the district and proposed local planning standards, as appropriate. This Assessment shows that East Herts is well served by a range of high quality, indoor and outdoor sports facilities. In general, residents are currently satisfied with the sports and active recreation facilities on offer.

Given the geography of the district, residents in Braughing, Buntingford and Little Hadham are typically likely to have the longest journey time to access the majority of sports facilities, although they are highly likely to have three or more cars in the household.

Recommendations in relation to Buntingford include:

- Sports Halls - it was recommended that in the medium/longer term, it is estimated that one additional larger (6 to 8 court) sports hall with full community access may be needed in the Bishops Stortford or a 4-court hall in the Buntingford area, depending on housing growth. This aspiration is dependent on funding becoming available.
- Athletics tracks - on the basis of the existing provision, up to 2 additional lanes might be required up to 2026. These levels of additional provision cannot be met alone, but depending on sports development factors, consideration might be given to a smaller training track or J-track in the north of the district, around Buntingford, possibly in conjunction with a developing school site.
- Swimming pools - there is much higher personal share in East Herts than the average. The highest personal share is in Buntingford and Bishops Stortford where the relative provision of pools is best, but almost the whole district has a better personal share than the average.
- Outdoor sports - Any growth in Buntingford, would result in the need for access to additional court time.

East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

This study forms part of the overarching Assessment of Sports Facilities and draws the following conclusions in respect of Buntingford:

- Football - There is a perception that some key sites are overplayed and that pitches are not adequately rested. It is felt that this is the case in Buntingford, where limited provision of Synthetic Turf Pitches results in grass pitches also being used for training and creates increased wear and tear of the surface. It was concluded that there is significant pressure on

facilities in Buntingford, for example, through both current and latent demand expressed by Buntingford Cougars and Hormead Hares.

- Cricket - plans to increase the number of teams it provides but any increase in teams will be accommodated at their existing home ground.
- The club currently uses courts at Norfolk Road which provides three tennis courts. The Lawn Tennis Association is keen for the club to affiliate in order to support its growth and meet demand expressed in the area. Consultation suggests the courts are heavily used by football clubs for training and access can be an issue. Any club growth would result in the need for access to additional court time.

Green Infrastructure Documents:

East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

This report concentrates on the provision of Green Infrastructure in the district and both identifies deficiencies and suggests measures for improvement. In terms of Buntingford, there are a number of specific findings. In applying the Natural England Accessible Natural Greenspace (ANG) standards, it is noted that in Buntingford there is poor provision of ANG as well as space for children. In order to improve access to open space, enhanced links along the disused railway line and river corridors has been identified. Green Infrastructure enhancement issues relate mainly to the integration of the hard southern edge of Buntingford to make better visual connections with wet woodland in landscapes such as the Quin Valley. Enhanced hedgerow planting would be beneficial to the A10 bypass to improve the setting of and approach to Buntingford in the landscape

With reference to the Woodland Trust's Accessible Woodland Standard mapping the northern half of the District appears to be deficient in accessible woodland; however this is likely due to the nature of the land use in this area (agricultural).

Consideration of the wider farmland landscape in East Herts reveals that a relatively high proportion of the landscape is managed through Higher Level Stewardship (HLS). These areas are spread throughout the north and west of the District, although most of the land in stewardship lies outside the 2.5 km settlement buffer defined for this study.

The flood zones within Buntingford are primarily open space; although there are instances of floodplain development. Future development in close proximity to the rivers within East Herts could exacerbate existing pressures in this area so identifying areas for wetland expansion may help alleviate this pressure. Any future settlement growth is likely to increase pressures during periods of high flows and could inevitably lead to flooding of developed land. The need to 'make space for water' outside and upstream of main settlement pinch points has formed part of the focus of a River Valleys project and also the Wetland Habitat Zone. The River Valleys Project seeks to create a rural 'blue' link along the river corridors including the River Rib.

In respect of Buntingford, the Green Infrastructure Vision seeks to improve and create enhanced links to greenspace, as well as opportunities for urban greening for community benefit and value, such as orchards. Any future development proposals should therefore take into account proposals in respect of proposed green infrastructure network and projects.

Issues and Options Consultation Feedback (autumn 2010)

The Issues and Options consultation brought forward many comments regarding the future growth of Buntingford and also views on preferred development density. The following section details the pertinent points of the many representations, but, due to the purpose of the consultation having been to elicit representations of a strategic nature, it does not report those elements of submissions relating to the promotion of specific individual sites.

Representations received from specific consultees included the following points:

Buntingford Town Council wished to see the former Sainsbury's Depot (included in Option 1: The Built-Up Area) as a stand alone option. If this was the case, this option would be their first preference. The town council also commented that, in respect of density, that a range of densities across a site should be considered.

Buntingford Civic Society expressed a strong desire to maintain the rural nature of Buntingford, protect and enhance the town centre and to ensure that growth is accommodated without compromising the setting within the wider landscape. The Society considered that there have been many small dwellings built in and around the High Street in recent times and there is little scope left for more development, save for the former Sainsbury Depot. In order to see Buntingford develop without despoiling the local landscape, land to the north followed by land to the south west would be preferable. Building on the lower lying land either side of the river Rib in this area, but within the confines of the by-pass, would avoid compromising the setting of the town in the wider landscape, although a problem is the distance from new development to the town centre. Buntingford Civic Society did not regard significant development to the east and north-east as at all suitable because of the higher elevation giving an impression of urban sprawl.

In respect of the issue of density, the Civic Society commented that recent developments have tended towards a higher density with small gardens and a lack of adequate parking. They expressed concern that if this trend continues, it would discourage people from putting down roots. What is required is a mix of housing types and densities that cater for those wishing to live a variety of different lifestyles and will allow for those with established roots in the community to down-size when the time comes and yet remain within the town. The Civic Society was largely in agreement with the vision but felt it needed to be strengthened.

Hertfordshire County Council's Passenger Transport Unit commented that all bus services in Buntingford are tendered routes and no commercial routes

operate. Views were expressed on the growth options and their potential to achieve sustainable bus service provision. These initial comments were developed further during the preparation of the Access to Bus Services and Access to Rail Services Assessments in Chapter 3: Assessment Criteria. As a general note, higher densities are favoured as these are more likely to generate commercially viable routes. It was also noted that the vision should include reference to sustainable transport.

Hertfordshire County Council's Services provided information on various service provision areas. The issues relating specifically to Buntingford are summarised below. Since the Issues and Options consultation, further up-to-date information has been received and this is also included in this summary.

One of the issues raised was the need for future educational provision in the district. A three tier system operates in Buntingford and the surrounding area (including Puckeridge). As such, the numbers fluctuate as some schools are primaries and some are first schools where children move onto middle schools in year 4.

There are three primary schools in the Buntingford area and there is currently some surplus capacity (1 FE) within the existing schools to cater for any additional need arising from new development. There is also potential to expand the two schools in the town itself by a total of 1.5 FE, although land is not currently in HCC ownership. There are two middle schools in the Buntingford area and there is no capacity within the existing schools to cater for any additional need arising from new development. Indeed, there is a 0.5 FE deficit at Edwinstree School in Buntingford. However, there is potential to expand on site subject to use of the adjacent public playing field as a detached playing field for the school. Further investigations are required. There is one secondary school, Freman College, which was full in 2010 and has a 2 FE deficit. Forecasts suggest that further places are required to meet future need. The school could be extended to the north but the land is not in HCC ownership.

In terms of Youth Connexions requirements, the existing facility would not be adequate for responding to a significant increase in the local youth population and use of other facilities in partnership, or a new facility, subject to resources, should be explored.

In respect of the statutory provisions of libraries, Buntingford library is in an accessible location and the space to the rear is not accessible. Buntingford has one of three Household Waste Recycling Centres (HWRCs) in the district. These are all very popular and largely serve their purpose. However, all three are operating at the limit of their capacity, if not beyond, and would find it difficult to cope with the additional demands that would come from more housing development. The Buntingford HWRC would therefore need improvement if asked to deal with a larger population.

The Environment Agency expressed views regarding flooding and drainage issues for the five growth options, which have been taken into account in the

Areas of Search assessments. The Environment Agency also commented that the vision would benefit from a direct reference that in flood risk areas, growth will be accommodated without increasing flood risk, and where possible reducing flood risk overall, perhaps by utilising any areas of floodplain as green//amenity space.

Thames Water considered that due to the complexities of the sewerage and water networks, that it was difficult to comment on the impact of new development on its networks prior to more known detailed information on the scale, type and exact location and phasing of development being known. However, it was noted that development should not come forward ahead of any necessary infrastructure upgrades.

The town is served by a sewage treatment works to the south. For the provision of infrastructure the location of growth to the south of the town is considered to be the most suitable. However, any development proposed close to the sewage treatment works would need to demonstrate that there would be no adverse impact on amenity through odour.

Hertfordshire Biological Records Centre did not support development to the south and west (Option 2) and to the north (Option 3). In respect of the vision, it was felt that reference should be made to protecting the natural environment, both habitats and species.

Natural England

Natural England supported the emerging vision for Buntingford in 2031.

Other comments

In addition to representations received from specific consultation bodies, various comments were also received from individuals.

General comments were received in respect of opposition to development and the need to preserve the rural nature of East Herts. The existing towns were considered to be at capacity and concerns were raised about the impact of development on infrastructure and the need to preserve the Green Belt. Many respondents preferred approach was to prioritise development on brownfield land and bring back empty properties into use, although others acknowledged the lack of available brownfield sites.

The need for growth was also questioned. For those who accepted that development needs to occur, it was stressed that adequate infrastructure must be provided. It was also commented that growth should be in proportion to the existing population or local population and job forecasts and that it should be up to local people to decide.

In respect of the options for growth of Buntingford, nearly half (45%) of the first preference responses were for the Built-Up Area of the town (Option 1), followed by development to the East (Option 5) at 20%. Development to the Northeast (Option 4) was the least preferred first preference with only 8%.

In respect of Buntingford, it was commented that it is distinct from the other towns because of its small size and the fact it does not have a rail link. Concerns were also raised about the lack of infrastructure in the town: particularly in respect of schools, health and buses. It was also considered that Buntingford had already received a lot of development and further growth would ruin the character of the town and there was a lack of local employment that acted as a limit on growth.

However, the comment was made that Buntingford is a vibrant market town with a good range of facilities, excellent access to the road network and good bus services: and is therefore a sustainable location for development. It was also considered that there was room for expansion in Buntingford since it was not in Green Belt.

If development were to take place in Buntingford, a mix of housing should be provided to allow people to move (as their needs change) but stay within town to ensure a sense of community. Careful planning also needs to take place to ensure that overdevelopment does not occur. Indeed, green fingers running into the town such as long existing rights of way should be preserved. Development should keep the town as compact as possible whilst the point was made that new development should be located in areas that are clearly delineated, such as by the A10 bypass. In terms of densities a medium density or a range of densities was favoured.

In terms of the emerging Vision for Buntingford, while many agreed or partly agreed with the sentiment, it was considered that the contents were too generic and a number of amendments were suggested including the need for the Vision to reflect a greater understanding of the nature of the town. In addition to references to sustainable transport, and a mix of housing, maintaining the landscape setting and historic character of the town should be specifically referred to. In contrast, it was felt that references to the former Sainsbury's Depot should be removed. Attention was also drawn to a vision by Buntingford Town Council.

Hertford

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy.

The second part of this section sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in

autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

The documents in the first part of this section have been grouped as follows:

Town/Community Documents:

- N/A (N.B. While there is currently no Town Plan in place for Hertford, it is understood that consideration will be given to the preparation of a Neighbourhood Plan in due course).

Sustainability Documents:

- Sustainability Appraisal Scoping Report (Scott Wilson, 2010)
- Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Housing Documents:

- Strategic Housing Market Assessment (ORS, 2010)
- East Hertfordshire Population & Household Forecasts – Parish Groupings and Towns (Edge Analytics, May 2012)

Land Availability Documents:

- The Strategic Land Availability Assessment (East Herts Council, 2012)

Economy Documents (Employment/Retail):

- Employment Land and Policy Review (Halcrow, 2008)
- East Herts Economic Development Strategy 2007-2012 (East Herts Council, 2007)
- Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)
- Retail and Town Centres Study (Chase & Partners, 2008)

Flooding and Water Infrastructure Documents:

- Strategic Flood Risk Assessment (East Herts Council, 2008)
- Rye Meads Water Cycle Strategy (Hyder, 2009)

Minerals and Waste Documents:

- Hertfordshire Minerals Local Plan Review 2002-2016, Adopted March 2007 (Hertfordshire County Council, 2007)

Infrastructure Documents:

- Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

Transport Documents:

- Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009)
- Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)
- Hertford and Ware Urban Transport Plan (HCC, November 2010)

Sport and Leisure Documents:

- PPG17 Audit and Assessment (PMP, 2005)
- East Herts Assessment of Sports Facilities (East Herts Council, June 2011)
- East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

Green Infrastructure Documents:

- East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

Sustainability Documents:

Sustainability Appraisal Scoping Report (Scott Wilson, 2010)

Explanation of the Council's approach to sustainability appraisal is contained in Section 1.12 of the Supporting Document. The views of a number of consultees on a draft of the Scoping Report were sought, with those bodies relating specifically to Hertford including: Hertford Town Council, Hertford Civic Society, Abbeyfield, Hertford & Ware Society, Hertford Town Centre Management Board, Kings Mead Community Association, Port Hill Common Residents Association, West Street Association, Hertford Town Football Club, Hertford Cricket & Hockey Association, Hertford Disability Support Group, Molewood Residents Association, and Oak Grove Residents Association.

The Scoping Report established a Sustainability Appraisal Framework including spatial areas and nine assessment topics. Six 'Spatial Areas' were identified as a planning tool to facilitate consideration of the strategic planning functions of different parts of the district. Broadly, these were based on Housing Market Areas plus consideration of additional functional relationships. In this respect, the Hertford-Ware area forms one of these specific groupings.

In terms of the Hertford-Ware Spatial Area, it is noted that the Hertford and Ware Urban Transport Plan (UTP) provides the following objectives:

- Transport should support new development and facilitate economic prosperity within Hertford and Ware;
- Transport should be integrated and reliable, allowing easy access to employment, leisure and key facilities and services for all;
- UTP schemes should be safe and efficient as possible and focus on encouraging less car use and promoting sustainable and healthy travel choices;
- The UTP should deliver value for money to local people;
- The UTP should improve the quality of life for residents and visitors alike; and
- The UTP programme should improve the local environment and respect the heritage of the study area.

Hertford and Ware are two of the primary settlements within East Herts. They are connected by the A119 as well as the Hertford East branch of the West Anglia Main Line. They are characterised by relatively high levels of affluence and employment, high house prices and high levels of out commuting / poor levels of self-containment. Hertford and Ware have been considered as

satellite settlements to Cheshunt based on the levels of commuting from these towns to Cheshunt. However, as Cheshunt lies outside East Herts the focus of attention within this section is on the dynamics within and between Hertford and Ware.

In terms of Hertford specifically, there are 13,304 employed residents and a workplace population of 15,909. The town has 5,265 people (approx. 40%) who live and work in Hertford. While this means that approximately 60% of residents commute outside the town for work there is still net in-commuting of 2,605. Approximately 64% use the car to get to work while only 13% rely on public transport. However, 13% of residents commute either by foot or bicycle.

Approximately 51% of residents work in East Herts, 21% in the rest of Hertfordshire, 6% in the rest of the East of England, 19% in Greater London and 2% in other regions. As could be expected, there are strong commuting relationships between Hertford and the nearby settlements such as Ware, Cheshunt, Hoddesdon, Welwyn, Stevenage, and Harlow.

There is particularly heavy congestion between Hertford and Ware. This is partially due to the 1,218 commuters travelling from Ware to Hertford who pass the 786 commuters travelling from Hertford to Ware everyday.

The Area Transport Plan for Hertford and Ware states that these historic market towns suffer from associated traffic and environmental problems, partly due to the central medieval street patterns.

The Scoping Report comments on what is likely to happen if a District Plan is not produced. Without the plan it is noted that there are significant areas of growth surrounding the Hertford-Ware Area with three nearby KCDCs bringing forward high levels of housing and employment. Hertford and Ware have strong functional relationships with these areas in terms of commuting and housing markets. It is difficult to assess what the situation will be without the plan but it can reasonably be assumed that without the appropriate policies in place, lower levels of containment would be experienced in the Hertford-Ware area given the greater selection and variety of jobs, services and entertainment facilities that can be anticipated in the surrounding areas. This situation would further increase congestion within the area.

In terms of what issues should be a particular focus for the appraisal, it is noted that, in relation to the Hertford-Ware area, these should include:

- Increasing more sustainable modes of transport
- Improving access to housing and services
- Housing affordability.

The Scoping Report also addressed a number of assessment topics. Many of the issues apply district-wide and have already been addressed in Chapter 2'. The key messages in the Scoping Report in relation to Hertford are:

- Air Quality – in respect of Hertford it was noted that a diffusion tube at West Street, Hertford exceeded the objective level in 2007 and the

Council's Progress Report recommended that three diffusion tubes be collocated at this location to ensure more accurate data collection. On the basis of this recommendation an Air Quality Management Area (AQMA) was anticipated to be declared in Hertford by March 2010¹⁰.

- Biodiversity - 10 Key Biodiversity Areas have been identified within East Herts and, in the general Hertford/Ware environs, these include:
 - River Ash Valley
 - Lea Valley¹¹
 - Rib Valley
 - Lower Mimram/Lower Beane/Bramfield Plateau.
- Climate Change and Flood Risk – within East Herts, main river flooding poses the greatest flood risk, particularly in the river corridors running through the urban areas of Hertford, Ware and Bishop's Stortford.

The extensive floodplains provide some natural storage and reduce the risk to urban areas, including Hertford. Interventions in the Middle Lee may help reduce flood risk downstream and attenuating water in the Middle Lee could also be part of a longer term option to reduce flood risk in the Lower Lee.

For East Herts, without the plan there is likely to be further risk of flooding within the urban areas of Hertford, Ware, and Bishop's Stortford. However, the plan should provide assistance in minimising this risk.

- Health and Wellbeing – in respect of Educational attainment in East Herts, this is generally very high with 72.8% of pupils in East Herts achieving five or more GCSEs with grades of A* to C. This compares favourably with Hertfordshire (55.9%) and national (46.8%) averages. Schools perform well in terms of A-levels and in 2006, the average points score per examination entry in East Herts was 213.4. This is above both Hertfordshire (207.1) and national (207.5) averages. However, there are isolated pockets of relative deprivation in this domain within, inter alia, Hertford.

There is also a need to ensure that the equality, health and social care needs of a growing and ageing population are met.

- Economy and Employment – no specific mention of Hertford. However, East Herts has suffered declines in employment despite population growth 1995-2005, although employment deprivation is low, suggesting increased employment of residents outside the district.

¹⁰ AQMA declared May 2010 and further investigation towards extending area carried out in 2011.

¹¹ Lea Valley is also of Regional Importance

- Historic Environment – no findings specific to Hertford, and the issues addressed are covered in Chapter 2 of the Supporting Document and the Historic Assets topic assessment.
- Housing – no comments specific to Hertford, and the issues addressed are covered in Chapter 2 of the Supporting Document.
- Land – no comments specific to Hertford, and the issues addressed are covered in Chapter 2 of the Supporting Document, and the Green Belt topic assessments.
- Landscape – no comments specific to Hertford, but draws attention to the need to address fragmented landscapes, including features such as hedgerows.
- Transport – identifies that there are particular congestion hotspots in Hertford where several junctions are exceeding capacity. Also, the only large extent of carriageway currently exceeding capacity in the district is the A414 west of Hertford. Additionally, the general comment was made that housing growth appears to drive higher projected traffic growth in East Herts than in other districts within the County.
- Water – most of the issues are addressed in Chapter 2 of the Supporting Document. However, the study also notes that the Environment Agency's general classification for the area is a major aquifer, and specifically mentioned is the area around Hertford and Ware, which is the district's major area of industrial activity. Other parts of Hertfordshire are classed as non-aquifer. Major aquifers are very sensitive to potential pollution.
- European Sites – this relates to the European Habitats Directive. This will be assessed in Chapter 5 of the Supporting Document.

Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Sustainability Appraisal of the Issues and Options Consultation document was undertaken using the SA Framework established by the SA Scoping Report. The Issues and Options document was a discussion paper and therefore did not propose any development options. Therefore the appraisal was inevitably high-level.

In terms of the appraisal against six spatial areas, it was noted that in the Hertford-Ware area, that greater levels of development within the area brought forward through all potential options will help to ease housing affordability issues. In terms of proposed growth options, 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. Options outside of the town centre (to the west, north and south) may encourage greater levels of private car transport, exacerbating existing problems with congestion within the Hertford-Ware area and across the wider

transport network. There are also concerns over the potential for coalescence between Hertford and Hertford Heath as a result of the growth option to the south.

In respect of appraisal against topic 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, the outcomes for Hertford were:

- Air Quality – Traffic congestion is the primary cause of poor air quality within Hertford and is likely to be negatively effected by all growth options. Development in the town centre in particular is 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 - By delivering growth on greenfield land, growth options outside of the built up area 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 and north, and open spaces and potentially land within a 'green finger' to the south.
- Climate Change and Flood Risk – All options suggest higher levels of development within Hertford and are likely to result in increased greenhouse gas emissions, particularly from transport. Growth options outside of the built up area locate development away from rail stations and the majority of services and facilities could lead to increases in private car use. However, owing to the location of the town centre in the river valley, it is prone to flooding risk which would compromise development under in this area (and potentially under the other growth options).
- Health and Wellbeing – Although the growth option to the south 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 – The existing retail offer within the centre of Hertford should receive positive benefits from the close proximity of additional growth which may come forward through development in the built up area, however there are also concerns that these areas may not be the most appropriate locations for non retail employment.
- Historic Environment – 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 locating development in the town centre and within the existing urban area will have a significant negative impact on these assets. There is the potential for growth options outside of the built up

area to lead to negative effects on designated historic assets however, these impacts are less certain and could more easily be mitigated.

- Housing – 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.

Under growth options for the built up area and to the north, 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. However, development within the built up area should have a positive impact in terms of meeting national PDL targets because it focuses growth on brownfield. However, there are concerns over the viability of housing delivery in this location due to substantial land costs.

Although growth options to the west and to the south have land availability that should deliver an appropriate housing mix, these options require greenfield land take and are likely to have a negative impact in terms of meeting the national PDL targets.

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 – Growth options outside of the built up area are likely to lead to negative effects against this topic because they require greenfield land to provide development. In the case of growth to the west, 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 – Growth options outside of the built up area would require a Green Belt review and development to the west and north would lead to significant negative effects on views of landscape from within the wider area.
- Transport – Development in the built up area 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.

Growth options outside of the existing urban area 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. Growth to the south 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 – Water scarcity within the East of England means that any level of development will place additional pressure on water resources. Built up area and potentially growth to the north options would lead to development within areas designated as ‘inner groundwater source protection zones’ which implies a greater risk of groundwater pollution.

In respect of mitigation measures, the Issues and Options Sustainability Appraisal made the following recommendations with regard to Hertford to help to improve the sustainability of current options as well as sustainability considerations to guide the Council in development of the Core Strategy.

In terms of the appraisal against six spatial areas, development within the Hertford-Ware area may require demand management measures to discourage additional congestion and minimise trip generation.

In regard to the appraisal against topic areas the following measures were suggested:

- Air Quality – Development within this area may require demand management measures to discourage additional congestion. Development within areas experiencing poor air quality levels could be avoided.
- Biodiversity - 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 and Flood Risk – 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 – Development should be avoided in areas which do not currently have, or would not reasonably lead to, good access to existing services and facilities.

- Economy and Employment – No specific recommendations.
- Historic Environment – 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 – 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 – An agricultural land survey could be undertaken to ensure that the lowest quality land is brought forward for development.
- Landscape – Impact on the views of the landscape should be avoided where possible. A Green Belt [review] should be undertaken prior to selection of areas for growth.
- Transport – 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 – Strong policies are required to minimise water use and maximise water efficiency. Development within inner source protection zones should be avoided if possible or steps taken to ensure that contamination of aquifers does not occur.

Housing Documents:

Strategic Housing Market Assessment (ORS, 2010)

Hertford is located within the A10 Corridor Housing Market Area. The study identifies close travel-to work patterns between Hertford and Ware, and between both towns and Hoddesdon/Cheshunt. Hertford and Ware are said to ‘naturally combine with the larger centres’¹². No specific links with Welwyn Garden City are mentioned in the study.

East Hertfordshire Population & Household Forecasts – Parish Groupings and Towns (Edge Analytics, May 2012)

This technical work generates a number of different demographic scenarios at the Sub-District level, including for each town. Whilst this information does not provide the ‘answer’ to the level of housing growth in a particular area, it can be used as the starting point for plan-making purposes that provides an

¹² Page 45.

indication of the level of housing required that then needs to be tested against planning policy, physical and environmental considerations. It may be the case that, in planning terms, a particular location cannot accommodate the level of development required to meet its housing needs. Equally, there may be valid planning reasons why a particular location should accommodate more than its forecasted growth. The following outputs were generated for Hertford:

Scenario	Household 2010 - 2033 No.	Change %	Average Dwellings Per Year	20 Year Total
Hertford Town				
Sub-National Population Projections 2010	4,151	35.2	185	3,700
Nil-Net Migration	3,137	26.6	140	2,800
Natural Change	2,199	18.6	98	1,960
Migration-Led	3,679	31.2	164	3,280
Completion Rate - 10 Year Average	2,747	23.3	123	2,460
Hertford and Central Southwestern Parishes				
Sub-National Population Projections 2010	4,607	33.4	205	4,100
Nil-Net Migration	2,682	19.4	119	2,380
Natural Change	2,683	19.5	119	2,380
Migration-Led	4,060	29.4	181	3,620
Completion Rate - 10 Year Average	2,959	21.5	132	2,640

Land Availability Documents:

The Strategic Land Availability Assessment (East Herts Council, 2012)

The SLAA considers the likelihood of sites coming forward for development within the built-up areas of the Six Main Settlements and Category 1 Villages in East Herts. It assesses the availability, suitability and achievability of sites and was subject to stakeholder engagement in May/June 2012. For the built-up area of Hertford the study concludes that at least 875 dwellings would be built over the plan period, including 164 in the next five years.

In September 2011, the Council initiated the SLAA Partnership to obtain feedback from stakeholders regarding deliverability of development and strategic planning from the perspective of the market. In respect of Hertford, general comments included:

- Traffic in Bengeo is a problem and Sainsbury's will exacerbate this. A strategic transport solution would be needed or there will be gridlock in the rest of the town.
- Topography means development to the north would cross contours and not fit in with the landscape.
- Floodplain issues raised
- Green fingers should be retained
- Hertford has good access onto principal highways and stations
- Employment developments in more rural locations away from the town centre not selling
- Need for elderly accommodation in town centre locations
- Development to the south could need a southern bypass
- For development in the Mead Lane Area, contamination issues were raised. Questioned whether noise from substation would make residential development inappropriate. Need to retain employment.

Economy Documents (Employment/Retail):

Employment Land and Policy Review (Halcrow, 2008)

This study notes that Hertford appears to have the lowest proportion of employment sites with good accessibility and the highest proportion of sites with poor accessibility. This is due to sites such as Caxton Hill which scores low on accessibility and which has historically been held back due to access issues. Employment land in Hertford appears to be the second least flexible in the district, after Bishop's Stortford¹³.

Marshgate Drive (which forms part of the wider Mead Lane designated Employment Area in the Adopted Local Plan, 2007) is the third largest employment site in the district (7ha).

Under the study's traffic light system, Hertford appears to have the lowest proportion of employment land rated as "Green" within the district, and a high proportion of "Amber". The ratings for all of the employment sites that were subject to appraisal in the town for the study are:

- Caxton Hill (Red)¹⁴
- Dicker Mill (Green)
- Foxholes Industrial Estate (Green)
- Hartham Lane (Green)
- Marshgate Drive (Amber)¹⁵

¹³ Flexibility refers to a site's potential for in-situ expansion or extension (i.e. without expanding the boundaries of the site).

¹⁴ Caxton Hill is described in the Study as being "an older, traditional estate primarily offering small warehouse units, with the quality of its stock being relatively poor". It scored poorly in terms of visibility as it is not accessible via the A414 and there are some adjacent residential properties backing onto the estate causing potential use conflicts. The estate was cited as having poor flexibility and some vacant units and recommended that it should be considered for release over the planning period provided that a better quality new site can be allocated for employment use. However, it should be noted that a scheme involving more direct access to the estate via the Foxholes Business Park is currently under investigation, which would improve its visibility and potential for inward investment.

- Merchant Drive (Amber)¹⁶
- Mimram Road (Amber)
- Pegs Lane (Green)
- Taylor Trading Estate (Amber)
- Wareham's Lane (Amber)
- Windsor Industrial Estate (Green)

In relation to office provision, Hertford was considered to be a secondary centre.

In terms of new employment provision it was noted that, as with Bishop's Stortford and Ware, given the urban concentration in Hertford, and the limited land available, it is considered unlikely that significant employment land opportunities exist in the urban area beyond those already in employment use. Therefore consideration will need to be given to new allocations as part of any urban extensions proposed.

East Herts Economic Development Strategy 2007-2012 (East Herts Council, 2007)

This document was produced by the Council in order to help provide a framework for realising economic development goals.

Hertford is the county town and is the second largest town in East Herts with a population of around 24,200. Though it is fairly small for a county town Hertford is the principal employment location within the district, largely because of the presence of Herts County Council and East Herts Council.

The town centre retail offer is a mix of independent local shops, national multiples and specialist niche outlets (notably the antiques shops in St Andrew Street). The night-time economy is thriving in Hertford with a wide range of restaurants, cafes, pubs and bars offering good quality services.

The town has a high level of out-commuting, particularly to London. The relatively high salaried commuters play a part in feeding the night-time economy. There is a different skills profile in the town during the day. The Foxholes Business Park and Mead Lane Industrial Estate are both close to the town and provide employment opportunities. These sites tend not to be part of the town centre network however.

The study notes that Hertford has excellent links to London via its railway stations and that the A10 provides road linkage to London and to Cambridge with excellent access to the M11 corridor.

In terms of Rural-Urban Inter-Dependency, market towns are viewed as being both urban and rural – they are the main urban settlements within their local

¹⁵ Since publication of the Study, this location has become the subject of part of the Council's emerging Mead Lane Urban Design Framework.

¹⁶ This area also forms part of the wider Mead Lane designated Employment Area in the Adopted Local Plan, 2007

rural area. However, in a regional scale they tend to be perceived as rural in scale and nature. Hertford's economy is seen as growing, especially with regard to the night-time economy.

East Herts has four Super Output Areas among the 25% with the most deprivation in the region. Two of these are on the Sele estate on the north-western edge of Hertford. This is one of the few large concentrations of social housing in the district. However, crossing the Welwyn Road takes you to an area among the top 6% in Hertfordshire with the least deprivation, ranking 646th in the county.

Retail and Town Centres Study (Chase & Partners, 2008)

According to the study there were 227 retail and service units in the town, including 17 convenience units equating to 8% of the total stock. The main convenience offer in Hertford is provided by Waitrose and Marks & Spencer Simply Food in the town centre and Tesco in an edge-of-centre location. The general picture to emerge for Hertford was that it was considered to be almost self-sufficient in terms of convenience goods shopping with local residents more likely than not to shop locally and generally retaining much of its pool of expenditure in this respect.

There were 89 comparison units, representing 39% of the units in the centre – in line with the national average. Hertford retains some 16% of the expenditure in the key clothing, footwear and fashion sector with Harlow, Stevenage and Welwyn Garden City in particular attracting significant amounts of the remainder. In other categories, Hertford retains 23% of expenditure on furniture and floor coverings, 13% of the household textiles sector, 37% of expenditure on domestic electricals, 28% of the audio visual/telephone/photographic sector, 16% of china, glass and hardware sector, 47% of the DIY sector, 43% of expenditure on books, jewellery and luxury goods and 78% of the chemist's goods market. These were considered to be generally healthy totals for a town lacking a major department store. However, the town is not a significant attractor of shopping visits from outside its zone and its catchment is therefore limited to its immediate environs. Across all categories, however, Welwyn Garden City is a significant draw.

Seven major retailers¹⁷ were identified in Hertford - Waitrose, Marks & Spencer, Boots, New Look, Clinton Cards, Woolworths and WH Smith, plus Tesco just outside the town centre with a total of 56 other multiple retailers¹⁸ across a variety of goods categories trading in the town.

Hertford has little in the way of an out-of-town retail presence. There are two retail warehouses located at the edge-of-centre Madford Retail Park, Ware Road, currently occupied by Focus DIY¹⁹ and Matalan. These units are of

¹⁷ Defined by Goad as retailers (approximately 27 national multiples), whose strong branding and comprehensive product mix can be sufficient in itself to attract consumers to a centre.

¹⁸ Defined by Goad as being part of a network or nine or more outlets.

¹⁹ Now Wickes

22,000 sq ft and 25,000 sq ft (gross) respectively. The nearby Tesco store (45,000 sq ft (gross)) was considered to be well related to the town centre.

The number of units accommodating services is also broadly in line with the national average. The vacancy rate of 3% was below the national average of 11%.

The study suggests that the main potential for growth lies at the Riverside Yards²⁰ and McMullen's Brewery site at Hartham Lane, and that Sainsbury's had proposed a store on the site²¹. Although known to have challenging traffic management issues and somewhat separated from the prime shopping area of Hertford, it was cited as a currently underused site close to the town centre and in need of regeneration. It was therefore suggested as a potential location for further retail development.

The study recommended designation of Hertford as the 'Secondary Town Centre' in the District. Hertford's role is to provide essential food shopping and services and it fulfils this role adequately. In addition it provides a limited comparison goods offer in an attractive shopping environment for those shoppers unable or unwilling to travel further afield.

Flooding and Water Infrastructure Documents:

Strategic Flood Risk Assessment (East Herts Council, 2008)

The Rivers Beane, Lea, Mimram, and Rib flow through Hertford. Hydrological modelling has established the extent of Flood Zone 3 (High Risk), and Flood Zone 2 (Medium Risk), and Flood Zone 1 (Low Risk). Given the number of rivers flowing through Hertford, the areas of Flood Zone 1 are less extensive and more fragmented than in the other settlements assessed. However, there is an extensive area of Flood Zone 1 to the south of the town. There are extensive areas of Flood Zone 2 and 3 associated with each of the rivers. Topic Assessment 10: Flood Risk includes a more detailed area-specific assessment, and this has been considered in the evaluation of the Hertford areas of search (nos. 10-13) set out in Section 4.2.

Rye Meads Water Cycle Strategy (Hyder, 2009)

This study was prepared in response to the requirements of the RSS, which identified capacity constraints at Rye Meads arising from proposed growth, particularly at Stevenage and Harlow. Further information on the Rye Meads issue is provided in Section 2.6: Water of the Supporting Document. The key issues in respect of Hertford's infrastructure are as follows:

Water quality has always been an important consideration; however, more stringent standards on river quality (and hence discharges into rivers) than present are likely to be applied by the EA, as the Water Framework Directive (WFD)²² is gradually implemented at a local level.

²⁰ Now substantially complete.

²¹ Due to open June 2012.

²² The European Water Framework Directive (WFD) sets out a strategy for protecting and enhancing the quality of groundwater, rivers, lakes, estuaries and coasts. It introduces the integrated approach to river basin management that the EA is currently applying to the 11

In terms of water quality in the Hertford area, the River Lee at Hertford was assessed as having a moderate ecological status. While its chemical status had not yet been assessed, its fish population was rated as being bad. The barriers to achieving good status were that in terms of its Phosphate levels, these were poor, and that the flow may not yet support good status. It was identified that the river should have flows to support good status by 2015 in order to achieve good ecological potential by 2027.

It was noted that the Lee (Navigation) in Hertford and Ware had a moderate ecological status. Its chemical status was not good and the barriers to achieving good status were that in terms of its Phosphate levels, these were poor, flow was not good; and Benzo Perelyene and Indeno Pyrene levels were moderate. The proposed date for achieving good status was given as 2027

In respect of flood risk, Hertford is identified as being especially at risk as the Rivers Mimram, Beane and Rib all converge with the River Lee in the town centre. There is therefore a significant risk of flooding within the town, and a history of regular flood events.

The sewerage network that delivers effluent to Rye Meads Waste Water Treatment Works (WwTW) consists of four main trunk sewers, of which the Hertford and Ware trunk sewer is one. The Welwyn Garden City trunk sewer also converges with the Stevenage trunk sewer at Hertford.

Due to the centralised collection network within the catchment, raw wastewater travels considerable distances. The trunk sewer from Stevenage to Hertford is in excess of 10 km long. Similarly, the trunk sewer from Hertford to Rye Meads WwTW is around 9 km long. The diameter of this sewer is 1.25 m for some stretches as it approaches the WwTW. Due to the size and depth; any future work to upgrade the capacity is likely to cause considerable disruption.

Given that the optioneering process in the report ruled out a new WwTW in or around Welwyn Garden City, Hertford, Ware and Harlow, it was accepted that Rye Meads WwTW would continue to treat wastewater from these settlements, including that from new development sites (although upgrades to the works and associate sewerage network would be required).

In terms of Hertford specifically, development would not be constrained by the capacity of the trunk sewer, as the new flows would only be a small proportion of the existing flows at this point in the network. Furthermore, disruptive local network upgrades could be avoided by choosing strategic sites with clear access to the trunk main network. However, such sites could be limited to the

River Basin Districts in England and Wales; identifying and characterising water bodies and protected areas in each district, and the pressures and risks upon them. The risk assessments themselves are used to show the risk that a water body could fail to meet 'good status' by 2015, a key aim of the directive.

west of Hertford. It was therefore implicit that outside of this location highly disruptive and costly local network upgrades may be required²³.

Minerals and Waste Documents:

Hertfordshire Minerals Local Plan Review 2002-2016, Adopted March 2007 (Hertfordshire County Council, 2007)

Minerals Policy 3 identifies, inter alia, Preferred Areas for future mineral working. Included among the sites identified is:

Preferred Area 2: Land adjoining Rickneys Quarry, near Hertford.

The Plan intends that, unless exceptional circumstances indicate otherwise, the county's needs for land-won aggregate will be met from the sites identified in Policy 3.

Infrastructure Documents:

Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

The study provides useful information and estimated costs for most of the major types of infrastructure required to support growth. It covers the functions of Hertfordshire County Council (highways, education, children's services, libraries, fire and rescue, waste disposal) the District Councils (open space, sport and recreation, waste collection), other public sector agencies (NHS, police, ambulance service) as well as private sector infrastructure providers (gas, electricity, water supply and sewerage). It was not possible for to study to specify new items of infrastructure in particular locations, and therefore it is understood that this work will need to be undertaken alongside the emerging District strategy.

Further to the main report, the Hertfordshire Infrastructure Investment Strategy (HIIS) Partnership commissioned a more detailed report to identify transport infrastructure and associated costs required as a result of targeted Regional Spatial Strategy (RSS) growth in Hertfordshire to 2031.

Transport Documents:

The *Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009)* had the objective of providing a means by which the partners could prioritise and bid for infrastructure 'interventions' (schemes, 'soft' measures or initiatives).

The majority of interventions listed within the document are linked to locations outside the district; however, in respect of East Herts specifically, a few areas to be addressed in Hertford itself, or for routes/services leading to it, have been identified. The issues raised include:

Rail:

- On the East Coast Mainline (First Capital Connect) rail service there is severe overcrowding in the AM and PM peaks on many services. The

²³ These findings were later refined within the Waste Water Impact Topic Assessment in Chapter 3.

highest inner suburban crowding levels with significant standing (typically south of Gordon Hill) occurs on AM peak Hertford Loop services;

- Forecast growth in passengers for Hertford North between 2004-2016 expected to be between 13% and 18%;
- There are insufficient parking spaces at a number of stations within Hertfordshire. 90% car parking occupancy or higher at Hertford North (2007);
- Limited number of trains that can be accommodated on Hertford Loop.

Road:

- Apart from the motorways, those road corridors experiencing the most problems, with the highest density of overloaded junctions, tend to be those running broadly east-west, including *inter alia* Welwyn/Hertford;
- A414/A119(W) Junction (A414 E & W and A119 N Approaches) and A414/B158 Junction (A414 E & W Approaches) are exceeding capacity for the AM peak;
- A414/A119(E) Junction (A414 SE Approach) is approaching capacity for the AM peak;
- A602 Stevenage to Hertford improvements.

Bus:

- Potential for bus passenger capacity deficit on 310/311 Hertford – Waltham Cross;
- Hertford-Ware, Bus Corridor.

Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)

LTP3 sets the framework for achieving a better transport system for all over a plan period of 20 years (2011-31). This plan will build upon the successes of LTP2 (which are summarised in the LTP2 Annual Progress Reports from 2007/08 to 2010/11) and focus on delivering the goals of supporting economic growth, achieving behavioural change, enhancing the quality of life, safety and security and addressing transport's effect on climate change. The LTP comprises 3 main volumes and a number of associated daughter documents.

In terms of Hertford, specific mention is made of the need for improvements to the A602 Ware to Stevenage road to be made as part of the A602 corridor strategy. The A602 forms part of the Primary Route Network in Hertfordshire, providing an east-west link between the A10 Great Cambridge Road in Ware and the A1(M) Motorway in Stevenage, as well as between the A414 and the A1(M). It is the main route between Hertford, Ware and Stevenage and is predominantly a rural single carriageway. The strategy for the corridor aims to upgrade the route to provide a higher quality link, to a consistent standard throughout, to deliver a higher service level and provide a safer, more reliable corridor appropriate for a principal route on the network.

It is recognised in the LTP that the majority of schemes will be identified through the rolling programme of Urban Transport Plans.

Hertford and Ware Urban Transport Plan (HCC, November 2010)

Urban Transport Plans (UTPs) are the mechanism utilised by Hertfordshire County Council in order to identify how and where the strategic objectives and targets identified in the county-wide Local Transport Plan (LTP), to which these are daughter documents, can be delivered at a local level.

The main proposals of the Plan seek to improve and join up the existing transport networks and promote healthier and sustainable travel choices. The Plan's short and medium term measures in particular are largely focussed on walking, cycling and passenger transport improvements, with limited proposals for some adjustments to highways, lorry routes, vehicle access and car parking.

For Hertford, in addition to the issues identified for the town in general, there were two other separate sub-studies attached to the UTP. The first concerns Bengeo, where rat-running has occurred for a number of years and the report assesses the potential for the surrounding road network to accommodate traffic currently avoiding the town centre congestion by using the narrow Victorian residential streets of lower Bengeo if the re-routing were deemed to be possible. In this respect, the effects on the highway network of the opening of the Sainsbury's store at Hartham would have to be fully assessed before any decision on potential alterations to current routes of access through the Bengeo area could be in turn further assessed for possible implementation.

The other discrete area of work covered the Mead Lane area and investigated the potential for the road network to subsume further development in that area to enable regeneration of a mixed use nature. This would not only be dependent on traffic volumes, but would also require alternative access proposals for the area to be provided to ensure that the current single point of access to the area could be supplemented to ensure emergency services access if required. The study concluded that further development could potentially be provided in the area subject to various access measures being employed, including, *inter alia*, a new link road and emergency access only proposals to utilise a new pedestrian area in front of Hertford North station²⁴.

For Hertford generally, there were specific transport issues identified. Congestion was seen as a problem, especially in respect of the A414 through the town and at its connection with the A10. Other congestion issues were raised for other areas of the town. Old Cross, Railway Street and Fore Street were cited as having particular problems, especially at peak time.

In terms of passenger transport, it was noted that although County Hall is the town's largest employer, its location has poor connectivity with passenger transport. Both stations were also identified as having insufficient car parking provision. The bus station was also in need of infrastructure enhancement. Cycle and pedestrian access issues were other areas where the need for improvements was identified.

²⁴ This study has subsequently been used to inform the preparation of the emerging Mead Lane Urban Design Framework.

As the UTP focuses on the existing built up areas of the two towns, it does not generally assess the impacts of any future development potential for the town. However, there is one notable exception in that, within the longer term measures identified, the potential to introduce a Park and Ride facility to serve both towns (with direct connections to rail stations, a bus and coach interchange and school drop off areas) is included, which would be intended to aid congestion in the area.

Sport and Leisure Documents:

PPG17 Audit and Assessment (PMP, 2005)

This study, involved an assessment of local needs and an audit of open space and indoor sport and recreational facilities, across the whole of East Herts to provide a clear vision and priorities for the future based on local need.

In terms of Hertford, its Castle Gardens were highlighted as being of high/significant value in terms of usage, quality and accessibility.

The majority of respondents were 'satisfied' regarding the accessibility of parks and gardens across the District. This was supported by the site assessments where the majority of the parks and gardens visited in the district were scored as 'good' or 'average'. In Hertford only the Willowmead area was considered to have 'poor' access.

The Kingsmead area (between Hertford and Ware) was noted as being of particular value.

With regard to provision for children and young people, the report recommended that in respect of teenagers, there was strong support for a dedicated skatepark in Hertford²⁵. In terms of playing space, a deficit was identified in the sub group area.

A local standard of 0.55 ha has been set for amenity green space provision. Based on this recommended local standard Hertford was identified as having a level of provision below this minimum standard. It was therefore seen as being particularly important that in the Hertford analysis area the amenity sites are of good quality, and that sites of other typologies should be considered to be re-designated as amenity green space, if applicable.

However, it should be noted that the Hertford grouping also includes the settlements of Aston, Datchworth, Watton-at-Stone and the rural areas to the north and south of the town. Therefore particular findings in the report may not necessarily be the case for the town of Hertford on its own.

It should be noted that, given the length of time that has elapsed since the study, some of the findings may not necessarily hold true today, especially those of a site specific nature, where measures may have been undertaken to address deficiencies.

²⁵ *This scheme has since come to fruition*

East Herts Assessment of Sports Facilities, (East Herts Council, June 2011)

This Assessment undertook a review of the current state of indoor and outdoor sports facilities in the district and proposed local planning standards, as appropriate.

The Assessment shows that East Herts is well served by a range of high quality, indoor and outdoor sports facilities. In general, residents are currently satisfied with the sports and active recreation facilities on offer. Particular issues raised for Hertford specifically in the report show that:

- Current provision of sports halls relies on all existing halls being available in some degree to community use. Better use of school halls is required to maintain this level of provision at present, and avoid existing halls being overused. In the short term, there is demand for the development of a 4-court sports hall to meet the needs of Hertford, possibly on the basis of dual use with schools, although this would be likely to drag demand in from outside the district. In addition, four of the existing main sports halls are operating at capacity, and additional space could therefore be considered, either on these sites by increasing capacity, or refurbishment, or by improving community access to other halls on nearby school sites.
- The Sports Facility Model suggests that unless there is any clear local demand for additional indoor tennis, it is unlikely that further provision can be justified at the current time.
- In the short term a new indoor bowls facility (at least one of 6 rinks, ideally two, totalling at least 8.5 rinks) is needed in population centres, preferably in the south and east of the district.
- For indoor bowls, it is estimated that, in the longer term, there will be demand for an additional multi-use 2-to-4 rink facility, which, if not met elsewhere, could be provided as a separate facility in the Hertford/Ware area, subject to close liaison with the national governing body.
- There is one public indoor swimming pool in the town at Hartham Leisure Centre, and private provision at the Nuffield Fitness & Wellbeing Centre.
- Health and fitness centres are available for the public at Hartham Leisure Centre, with registered member provision being made at the Nuffield Fitness & Wellbeing Centre and private or community use at various schools and at Hertfordshire Fire and Rescue.
- For tennis, demand for floodlighting has been identified at Hertford Tennis Club.

The *East Herts Playing Pitch Strategy, (Knight Kavanagh & Page, July 2010)* forms part of the overarching Assessment of Sports Facilities and draws the following conclusions:

There is a significant demand for junior and mini football and rugby facilities in the Hertford-Ware area. This level of demand reduces for adult players resulting in a slight over-supply of adult facilities. In the short term, one option to redress these demand and supply issues would be to realign adult pitches into junior pitches. However, this approach prevents an effective management programme for pitch rotation, i.e. allowing pitches to rest periodically to prevent over-play and damage to popular pitches. The longer-term approach would be to facilitate more community use of education facilities and the creation of a new multi-pitch facility providing for a range of users. An issue for all football and rugby clubs across the district is the lack of a suitable home ground. The District's football clubs field many teams which cannot all be accommodated on their home grounds thus resulting in the over-use of public pitches for training and match events. A purpose-built facility used as a 'home ground' would reduce this informal use and enable clubs to apply for funding for development.

There is also an identified latent demand for more tennis courts. Floodlighting and additional courts are suggested as a means of meeting this demand. The strategy suggests that the slight over-supply of cricket pitches identified should be retained to facilitate increasing demand.

Green Infrastructure Documents:

East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

This report concentrates on the provision of Green Infrastructure in the district and both identifies deficiencies and suggests measures for improvement.

In terms of Hertford, there are a number of specific findings, of which some of the important issues raised are discussed below.

In applying the Natural England Accessible Natural Greenspace standards, it is noted that Hertford has been identified as having a deficiency in this category, as well as in provision of space for children and young people. It is suggested that this should be prioritised for action, for the former, mainly through enhanced links to the wider countryside via the river valleys from Hartham Common out into the countryside.

Within Hertford, there appear to be few off-road links between the urban area and the surrounding countryside, and this is particularly true to the north and west of Hertford, which is severed from the countryside by the A414 and B1502 road, and this is an issue which should be addressed. Cycle provision is also limited within Hertford which should be supported through improved access as part of public access enhancements across the District.

The river corridor between Hertford and Ware has been identified as a key issue to make improved links between the towns and the wider countryside, while also ensuring lateral links across the District, particularly if future growth is considered to the urban fringes.

In terms of the Woodland Trust's Accessible Woodland Standard, mapping the south west of the District surrounding the larger settlements of Hertford

and Ware has therefore formed part of the focus for a Woodland Enhancement Zone.

There is a significant opportunity to enhance and expand wetland character near pinch points such as at Hertford and Ware where the rivers of the District meet. Opportunities for access improvements could also be met through the proposed Hertford and Ware Wetland Enhancements project.

Urban greening, shading and cooling is a key part of community focussed green infrastructure. While analysis concentrated on tree cover, clear links with other functions such as flood attenuation and water management, as part of a climate change adapted response to spatial planning were identified, and this function was cited as particularly relevant to the higher density settlements within the District, such as Hertford.

Due to the number of mineral sites and their proximity to each other (e.g. surrounding Hertford and Ware), proposals should aim to connect and improve the quality of the land, thereby enhancing the character of the landscape. This could be brought forward as part of the ongoing Panshanger Park restoration.

Any future development proposals should therefore take into account proposals in respect of proposed green infrastructure network and projects.

Issues and Options Consultation Feedback (autumn 2010)

The Issues and Options consultation brought forward many comments regarding the future growth of Hertford and also views on preferred development density. The following section details the pertinent points of the many representations, but, due to the purpose of the consultation having been to elicit representations of a strategic nature, it does not report those elements of submissions relating to the promotion of specific individual sites.

Representations received from specific consultees included the following points:

Hertford Town Council's comments relating specifically to growth, density and the vision included the following.

The Council considered that, while largely agreeing with and supporting the themes outlined, all of the proposed Growth Options posed serious challenges to achieving these themes. While recognised that Hertford has the highest proportion of the district's employment land at 26%, it was considered that all existing commercial land should be retained. Option 1 was the Town Council's first preference for the future growth of Hertford. However, this could not be at the expense of employment land, which should be retained for the benefit of the town and not transferred to other parts of the District. New employment areas should also be allocated.

All of the suggested Options would be likely to increase the pressures on an already congested road infrastructure. It was considered doubtful that growth

options 2 to 4 would have the desired objective of reducing carbon dioxide emissions in a town already heavily dependant on the car for transport. The impact on existing road infrastructure was considered to be most acute under Option 3.

The Town Council considered that the options chosen should protect the town's character and referenced the openness and greenness which is achieved by the river valleys within the town and fields and woodland beyond the town's urban boundary. These features, coupled with Hertford's flood plains and accompanying 'Green Fingers' must be preserved and not form part of the land considered under any Option. Growth should be considerately planned outside the current urban sprawl.

Development under Option 1 should retain open spaces. Development under any Option should make provision for a growth of health facilities in proportion with the increased population and should only be allowed when and where infrastructure needs have been assessed and funding secured for improvement.

Options 2 to 4 may offer the best chance to provide the diversity of housing stock and also provide the opportunity to release the volume of land needed for accompanying infrastructure, not least primary school places. However, this would be at enormous expense to the Green Belt. Furthermore, any substantial growth in one area would risk upsetting the natural balance of the town, developed over the centuries. If greenfield development is required, perhaps the town's future development may be best achieved through the considerate use of all, rather than the single exploitation of one, of the external growth Options.

In terms of density there was concern not only with the preservation of the built environment of Hertford, but also in maintaining the community character and population balance of the town, which could only be maintained through a mixture of housing provision. Sustained development of high density housing in the form of apartments in recent years was felt had led to density issues in terms of infrastructure, changes in dynamics within communities, and the character of the area. It was important to restore the balance through lower density, higher quality developments.

Regarding the vision, the Town Council was opposed to regeneration of the Mead Lane area where this would involve a major change of use.

Hertford Heath Parish Council questioned whether Hertford could really cope with any more development due to road congestion and the ability of infrastructure to cope. In terms of the vision, it considered that improved access in the Mead Lane area was essential.

Hertfordshire County Council's Passenger Transport Unit expressed views on the growth options and their potential to achieve sustainable bus service provision. These initial comments were developed further during the

preparation of the Access to Bus Services and Access to Rail Services Assessments in the Step 3: Topic Assessments.

In terms of transport provision, higher densities were favoured as these are likely to be more commercially viable.

Hertfordshire County Council's Services provided information on various service provision areas. The issues relating specifically to Hertford are summarised below.

One of the issues raised was the need for future educational provision in the district. For Hertford it identified that for primary education there are eight primary schools in the planning area - [Abel Smith](#) (1FE), [Bengeo Primary](#) (2FE), [Hertford St Andrews C of E Primary](#) (1FE), [Hollybush Primary](#) (1FE), [Mill Mead](#) (1FE), [Morgans Primary](#) (2FE), [St Joseph's Catholic Primary](#) (1FE) and [Wheatcroft Primary](#) (1½FE).

Hertford Primary Schools	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast
Total	315	300	326	367	332	315	329	329

A shortage of 2FE is forecast in the short term. This will be met through the provision of 1FE of permanent need and a further 1FE of temporary need.

An exercise has been undertaken to identify expansion potential of all primary schools across the town, which at a number of sites is made difficult by town planning constraints. Any new housing is likely to generate a need for additional school places and it would be prudent to identify reserve school sites within the LDF process.

There is land in HCC ownership in Mangrove Road that is located within the area of need for primary school places. Part of this land is occupied by Hertford Cricket Club. If this site is allocated as a reserve primary school site then the cricket club will need to be relocated.

For secondary education, Hertford forms part of the Hertford and Ware planning area. There are five secondary school located within this area – The [Chauncy](#) (5FE), [Presdales](#) (5½FE), [Richard Hale](#) (5½FE), The [Sele](#) (5FE) and [Simon Balle](#) (PAN 160).

Hertford & Ware Secondary Schools	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast	2023/24 F/cast
Total	790	718	718	728	730	767	774	788	809

Two reviews have been carried out of secondary schools in this area, in 2004 and 2006. Additional capacity may be needed to meet the projected need in the medium term.

Numbers are forecast to increase from 2014/15, when there will be less than 5% surplus capacity. The number of places will need to be increased by 0.5 FE for 2014/15, increasing to an additional 2FE by 2023/24.

If the schools are to be expanded on their existing sites flexible policies may be required as three of them are in the Green Belt.

In order for Chauncy, Presdales and Richard Hale to expand additional playing fields will be required. These may need to be in the form of detached playing fields or all weather pitches.

In terms of Youth Connexions requirements, this body would require access to properties to run youth work/positive activities programmes, information, advice and guidance and targeted support to individuals or groups within significant areas of population. They would expect to deliver services in partnership with the voluntary and community sector as well as the District Council.

The preferred model would be to locate services in the larger towns and have access through community facilities in smaller communities through access to shared use of local facilities. Youth Connexions would prioritise development of sites in the larger areas of population to enable a more diverse and higher quality youth offer whilst working in smaller communities on more limited short-term projects.

In terms of Hertford specifically, Youth Connexions look to provide for the Hertford and Ware area. It is noted that Neighbourhood community facilities are used in Hertford.

Children's Centres should be provided for every 800 children aged 0 to 5. Developments of 2,500 dwellings will require a children's' centre.

Library provision was noted as being a statutory service. Hertford library was currently located in Old Cross but was noted as being due to relocate to a building in Dolphin Yard in 2011²⁶. This is a central location.

Waste Management/Disposal matters were also raised and it was identified that there are three Household Waste Recycling Centres (HWRCs) in the district, the Ware site being the most closely located to Hertford. These HWRCs are provided by the County Council and are all very popular and largely serve their purpose. However, all three are operating at the limit of their capacity, if not beyond, and would find it difficult to cope with the additional demands that would come from more housing development. Improvements to these would be required.

Adult Care Services (ACS) detailed a number of issues that were generic to the district.

²⁶ *This relocation has since occurred.*

The Environment Agency expressed views regarding flooding and drainage issues for the growth options, which have been taken into account in the Areas of Search assessments. In general it was noted that natural buffer zones should also be left free of development along the rivers corridors themselves, not only to provide a green corridor, but to ensure access can be maintained to the watercourses and existing flood defences, and space is left for potential future flood defence work.

In respect of development density it was noted that with higher density development, if development in the floodplain cannot be avoided, this would place a higher density of people living in areas at risk of flooding. However a higher density of development may involve the use of less land for development and thus be easier to avoid flood risk areas. Lower density developments will require more land take increasing the likelihood that development will occur in areas at risk of flooding.

The Agency further considered that the vision should state that development in the flood plain should be avoided would benefit from a direct reference to managing flood risk and using new development to contribute to reducing existing flood risk wherever possible.

Thames Water considered that due to the complexities of the sewerage and water networks, that it was difficult to comment on the impact of new development on its networks prior to more known detailed information on the scale, type and exact location and phasing of development being known. However, it was noted that development should not come forward ahead of any necessary infrastructure upgrades.

Sport England's view was that while the overall vision would be broadly supported, the core strategy needs to address the land use implications for Hertford of the [then] recently completed playing pitch strategy as deficiencies in the area are particularly significant e.g. the need for additional playing pitches would justify new sites being identified for outdoor sport and/or major new development should incorporate outdoor sports provision.

Hertfordshire Biological Records Centre did not support growth option 2 (to the west). It also considered that the vision must include the protection of the natural environment; particularly The Hertford Green Fingers, its rivers, Wildlife Sites, Local Nature Reserve and the species they support.

Natural England supported the emerging LDF Vision for Hertford.

Hertford Civic Society considered that a study (potentially a Town Plan) should be conducted to identify Hertford's needs up to 2031 before searching for sites to expand the town.

Also, the expansion of Welwyn Garden City eastwards should be taken into consideration when looking at the growth options for Hertford, on the grounds that it will remain important to maintain a sufficiently wide rural belt between the two settlements. If there are to be any extensions of Hertford's

boundaries, they should be sited alongside areas already served by local schools, shopping facilities and bus routes to the town centre.

Transition Hertford considered that, from an environmental sustainability perspective, Option 1 would be most preferable due to public transport accessibility and the potential to reduce growth in car use, associated emissions, and congestion. Additionally, biodiversity impacts of development on greenfield land would be avoided.

However, the amount of brownfield land was recognised as being limited, therefore additional options are likely to be required which should take into account public transport links and concentrate dense development around them.

For Option 2 there should be no encroachment on ancient woodland.

In terms of density, higher density development would be preferred from the perspective of environmental sustainability as, subject to careful design, this would tend to provide greater opportunities for decentralised energy; reducing land take; potentially reducing heating demand (by allowing buildings to shelter one another from cool winds and reducing the proportion of external walls); and supporting public transport provision and other local services.

Concerning the vision, it was considered that not enough attention was being paid to "creating harmony between environmental, social and economic needs" - rather, nearly all the emphasis is on social and economic needs with a few tweaks which are hoped to provide a response to climate change. The challenges of climate change, sustainability, peak oil and increasing volatility in global markets and financial systems have not sufficiently been taken into account.

The Ware Society had no view on the overall development options for Hertford. It considered that none of the proposed options would impact on Ware but emphasised that any coalescence between Ware and Hertford would be unacceptable.

Other comments

In addition to representations received from specific consultation bodies, various responses were also received from individuals.

In respect of the future growth of the town (Question 30), of the 403 respondents who expressed a preference, the first choice rankings showed that over 52% (211) supported growth within the Existing Built-Up area. The second most popular direction of growth was to the West (84 people, 20.8%). Growth to the South (63 people, 15.6%) was the third choice, with the least favourite option being growth to the North with only 11.2% support (45 people).

To elaborate on their preferences, some respondents added comments to support their views. Some of these representations put forward the opinion

that either the town had already been overdeveloped, or that its infrastructure would be unable to cope with additional development.

The Green Belt was seen as another constraint to development, with some advocating no development in this location. The need to avoid coalescence with other settlements, most notably Ware and Hertford Heath, was another point made. Additionally, one view was that land around the town would be required for future agricultural purposes.

There was some support for allowing growth within already developed areas. Several respondents advocated the use of brownfield land as a first option; with one view being that disused commercial premises should be used for residential provision. Another opinion was expressed that there should be a priority to provide good trade and jobs in the town centre before the population is increased. An additional point was made regarding the need for regeneration of deprived areas.

Development was suggested to the west of Sele Farm, with the Archers Spring area cited as being well served by local centre and would resolve longstanding misuse problem.

Traffic and congestion were seen as particular issues for the town and road infrastructure was cited as being too antiquated/inferior to accommodate all the new developments, especially the A414. A suggestion was made that the town should be bypassed to relieve existing congestion. However, another point was made that new development should be sited near existing roads. The trains on both Hertford North and East lines were also perceived by some as being over subscribed. Parking in the town was also raised as being difficult. The ability of public services infrastructure to cope with even more people was also questioned.

Other opinions involved the need for development land to be near to existing services, schools, transport links, and to respect the historic layout, fabric and character of the town. Beyond housing, the need to provide amenities for people, especially teenagers, beyond sports facilities, was also identified.

In terms of specific growth options, one view was that option 3 was unsuitable due to a lack of transport links and existing traffic congestion. Also, this option would involve flooding issues, due to lack of capacity in the drainage system. Development to the north of the town was cited as being a problem because it would increase traffic in Porthill and the "rat run" through lower Bengoe.

Other suggested options to those put forward in the consultation involved:

- Placing the A414 (Gascoyne Way) in a tunnel and construct dwellings on the space above;
- Building a by-pass to the south of Hertford then infilling between.
- Relocate sorting office from Churchfields to ease traffic congestion in town centre build medium density housing on site.

In respect of the density approach for any future development, there were mixed views presented. Of the 29 people who expressed a view in ranking Question 31, for their first preference just over 55% (16) opted for higher density, involving lower land-take. Only three people (10%) preferred lower density provision, while around 34% (10) were in favour of medium density developments.

Supplementary comments showed that, while some people supported higher density development due to its lower land-take, others considered that there had been an excessive number of flats built in recent years and that more houses should be constructed. A view was also promulgated that higher density developments in the town had led to increased traffic congestion.

Some respondents held the opinion that development in the urban area of Hertford should continue to be relatively dense, to make the most efficient possible use of land in this sustainable location. One respondent considered that, to favour more mixed communities, there should be an '*onion skin*' approach which would provide a higher density zone with local services, surrounded by medium density housing with '*fingers*' of lower density housing radiating out to an outer zone of lower density housing.

Another view was that the Core Strategy should provide general guidance on a range of densities and that the Site Specific DPD should provide more detailed consideration of density regarding individual sites.

Several responses advocated that it would not be possible or realistic to seek to define development densities on a town-wide scale and that density should be determined on a site specific basis. Many considered that development should be consistent with the density and design of existing neighbouring residential areas to reflect local character, while others supported a mixed density approach. Another oft-repeated view was the need to ensure that the "green fingers" and green spaces should be respected and preserved along with other features that make Hertford attractive.

Considering the limited number of responses in this area overall, there was a mixed approach to density; however, there was certainly a higher level of support for high or medium density (or a mix of the two), rather than low density which was considered by many to be wasteful of land.

In terms of Question 32, there were 31 responses. All of these respondents either agreed (16 people, representing 51.6%) or partly agreed (15 people, 48.4%) with the emerging Vision for Hertford. However, in respect of the additional comments received, some considered that the contents were either too vague or unrealistic. Others considered that the Vision could only be fulfilled if there was little or no growth in Hertford in order to preserve the character of the town.

Specific suggestions for amendment to the Vision involved the inevitability of Green Belt development and that it was misleading not to acknowledge this in the Vision. The need to avoid coalescence was raised as an issue to be

addressed in any revision, as was the need for future housing to integrate into the existing settlement.

Another theme of some responses made was the importance of town/country relationships, quality of the surrounding countryside, and preservation of the "green fingers". These were cited as being significant to Hertford's character and for providing public access to green space. The matter of trees also featured in one response, which put forward the view that they were needed not just for climate change reasons but because they make life better for all. Additionally, trees above roof height were seen as being especially valuable in "greening" a town.

Another view was expressed that more development would lead to more traffic and congestion in the town. Parking issues were also raised along with the need for the Vision to address both these matters.

The element of the Vision concerning the provision of a dedicated cinema in the town was not seen as practical without having to site it in a greenfield location, particularly in the age of large multiplex cinemas. It was hoped that the newly refurbished Hertford Theatre would increase its offering of recently released films²⁷.

A further point made was that the Vision should follow PINS guidance and not contain vague aspirations.

Sawbridgeworth

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy.

The second part of this section sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

The documents in the first part of this section have been grouped as follows:

Town/Community Documents:

²⁷ *The Hertford Theatre continues to fulfil this role and has increased the amount of film showings since the Issues and Options consultation.*

- Sawbridgeworth Town Plan (2010)

Sustainability Documents:

- Sustainability Appraisal Scoping Report (Scott Wilson, 2010)
- Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Housing Documents:

- Strategic Housing Market Assessment (ORS, 2010)
- East Hertfordshire Population & Household Forecasts – Parish Groupings and Towns (Edge Analytics, May 2012)

Land Availability Documents:

- The Strategic Land Availability Assessment (East Herts Council, 2012)

Economy Documents (Employment/Retail):

- Employment Land and Policy Review (Halcrow, 2008)
- East Herts Economic Development Strategy 2007-2012 (East Herts Council, 2007)
- Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)
- Retail and Town Centres Study (Chase & Partners, 2008)

Flooding and Water Infrastructure Documents:

- Strategic Flood Risk Assessment (East Herts Council, 2008)
- Rye Meads Water Cycle Strategy (Hyder, 2009)

Infrastructure Documents:

- Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

Transport Documents:

- Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009)
- Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)
- Bishop's Stortford and Sawbridgeworth Urban Transport Plan (HCC, forthcoming)

Sport and Leisure Documents:

- PPG17 Audit and Assessment (PMP, 2005)
- East Herts Assessment of Sports Facilities (East Herts Council, June 2011)
- East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

Green Infrastructure Documents:

- East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

Town/Community Documents:

Sawbridgeworth Town Plan (2010)

The Sawbridgeworth Town Plan identifies six main issues of concern for the local community: roads and transport; plan housing sensibly; car park charges; support for voluntary sector; support for local businesses and; a replacement scout hut. The plan devises eight action plans to deal with these and other overarching issues: Traffic and Transport; Crime and Disorder; Amenities and Facilities; Environment; People; Planning and Housing; Spellbrook; and Economic Development.

Sustainability Documents:

Sustainability Appraisal Scoping Report (Scott Wilson, 2010)

Explanation of the Council's approach to sustainability appraisal is contained in Section 1.12 of the Supporting Document. The views of a number of consultees on a draft of the Scoping Report were sought, with those bodies relating specifically to Sawbridgeworth including: Sawbridgeworth Town Council, Sawbridgeworth Sports Association, Sawbridgeworth Tennis Club, Sawbridgeworth Cricket Club, Rivers Nursery and Orchard Group, Stort Valley Friends of the Earth and the Stort Valley Project Team.

The Scoping Report established a Sustainability Appraisal Framework including spatial areas and nine assessment topics. Six 'Spatial Areas' were identified as a planning tool to facilitate consideration of the strategic planning functions of different parts of the district. Broadly, these were based on Housing Market Areas plus consideration of additional functional relationships. In this respect, Sawbridgeworth falls within the M11 Corridor Area, which in turn is part of the London-Stansted-Cambridge-Peterborough Growth Area and within that lies within the London-Harlow-Stansted programme area. The Scoping Report identifies a need to review the local transport plan for the area.

The Stort Valley is at the heart of the vision for the Green Infrastructure Network within the Harlow area. In particular, the Stort Valley presents a major opportunity for developing a series of multi-functional and connected green spaces, areas managed for wildlife and opportunities for access and recreation.

Within the M11 Corridor, the two primary East Herts towns are Sawbridgeworth and Bishop's Stortford which are to the west of the M11. These towns are joined by the A1184 and the West Anglia Main Line. The River Stort and the Stort Valley runs through this area on a north-south axis and is a critical component of the area's green infrastructure. The area is characterised by low levels of self-containment and house prices which are approximately 110% to 125% above the regional average. These are significantly higher than in neighbouring Harlow but less than most of the rest of the district.

With 4,187 employed residents and a workplace population of 2,537, the town experiences 1,092 (26%) who live and work in Sawbridgeworth. This means that approximately 74% of employed residents commute outside of the town leading to overall net out commuting of 1,650. Approximately 66% use the car

to get to work while 14% rely on public transport. However, 7% of residents commute either by foot or bicycle.

The Scoping Report comments on what is likely to happen if a District Plan is not produced. Without the plan the increasing levels of congestion within the area are likely to continue, particularly given the high levels of planned growth in and around Harlow. It is likely that without appropriate planning of adequate employment facilities to provide for growth, particularly at Stansted Airport, the area will experience decreasing levels of self-containment, generating additional vehicle trips on the local road and motorway network. While the Stort Valley remains remarkably unaffected by the M11, Stansted Airport and high levels of traffic on nearby roads, without the plan it is unlikely that this situation will remain. In addition, opportunities to maximise the Stort Valley's potential as part of the wider area's green infrastructure network will not be realised.

Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Sustainability Appraisal of the Issues and Options Consultation document was undertaken using the SA Framework established by the SA Scoping Report. The Issues and Options document was a discussion paper and therefore did not propose any development options. Therefore the appraisal was inevitably high-level.

In terms of the appraisal against six spatial areas, it was noted that in the M11 Corridor area, that greater levels of development within the area brought forward through all potential options will help to ease housing affordability issues. There were conflicts between the possible outcomes of the options presented. 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. It noted that Option C (towns, larger service and smaller service villages) could help to address deficiencies in access to public space, while options D (pepperpotting development across the district) would not facilitate a shift towards sustainable modes of transport and would most likely have a negative impact on local congestion and the environmental integrity of the Stort Valley.

Housing Documents:

Strategic Housing Market Assessment (2009)

The town is located within the Harlow/M11 Corridor Housing Market Area and has close relationships with Bishop's Stortford and Harlow. Hertfordshire and north-west Essex have been attracting families, with a substantial net gain in both the 25-44 age groups and the 0-15 age groups. Harlow, however, is losing people in these age groups. The study indicates 5-year net migration into East Herts of over 1000 people from both Harlow and Broxbourne between 2002 and 2007, and out-migration over 1000 people from East Herts to Uttlesford over the same period.

East Hertfordshire Population & Household Forecasts – Parish Groupings and Towns (Edge Analytics, May 2012)

This technical work generates a number of different demographic scenarios at the Sub-District level, including for each town. Whilst this information does not provide the 'answer' to the level of housing growth in a particular area, it can be used as the starting point for plan-making purposes that provides an indication of the level of housing required that then needs to be tested against planning policy, physical and environmental considerations. It may be the case that, in planning terms, a particular location cannot accommodate the level of development required to meet its housing needs. Equally, there may be valid planning reasons why a particular location should accommodate more than its forecasted growth. The following outputs were generated for Sawbridgeworth:

Scenario	Household 2010 - 2033 No.	Change %	Average Dwellings Per Year	20 Year Total
Sawbridgeworth Town				
Sub-National Population Projections 2010	591	16.6	26	520
Nil-Net Migration	266	7.5	12	240
Natural Change	270	7.6	12	240
Migration-Led	497	13.9	22	440
Completion Rate - 10 Year Average	325	9.1	15	300
Sawbridgeworth and Southeastern Parishes				
Sub-National Population Projections 2010	649	16.0	29	580
Nil-Net Migration	325	8.0	14	280
Natural Change	341	8.4	15	300
Migration-Led	536	13.2	24	480
Completion Rate - 10 Year Average	381	9.4	17	340

Land Availability Documents:

The Strategic Land Availability Assessment (2012)

This study investigated in some detail the suitability, availability and deliverability of landowner/developer proposals for development within the urban area of all the settlements in East Herts. The study was subject to public consultation in May 2012. For the Built-Up Area of Sawbridgeworth, the study concluded that 111 dwellings were possible within the existing built up area.

In September 2011, the Council initiated the SLAA Partnership to obtain feedback from stakeholders regarding deliverability of development and strategic planning from the perspective of the market. In respect of

Sawbridgeworth the SLAA stakeholders agreed that there was developer interest in land around the town and therefore there was a sufficient market for new development in the area. Much would depend upon whether development occurred to the north of Harlow and whether a bypass was constructed to the west of Sawbridgeworth. Stakeholders acknowledged that there was a clear link between people residing in Sawbridgeworth and commuting to Harlow. Land to the north of the town would have potentially good access though there were issues over the floodplain. Land to the east at the Esbies site was raised as an area of floodplain that was previously rejected. Stakeholders stated that Lower Sheering functions as part of Sawbridgeworth.

Stakeholders with an interest in land to the west of Sawbridgeworth suggest that development could occur here without the need for a bypass, that the site has good access to the town and that the part of the land within a floodplain could be avoided. Stakeholders suggested that the role of the Green Belt in this location should be reviewed. With regards to land at the Thomas Rivers Nursery and Orchard, it was suggested that a strategic rather than piecemeal approach to development should occur here but that the historic character of the town should be considered.

North of the town in nearby Spellbrook, a stakeholder with land interest indicated that the Hayters Lawnmowers site was not fit for purpose as stated in the Employment Land Review 2008 and that expansion was needed in order to retain the employer in the location. This expansion would need to be funded by residential development.

South of the town, land at Redricks Lane was discussed. Stakeholder queried the viability of the scheme given that land remediation from contaminated landfill to buildable quality would be very expensive. Stakeholders with land interest suggest that the environmental benefits and risk reduction for the local community would override concerns with the proposal.

Economy Documents (Employment/Retail):

Employment Land and Policy Review (Halcrow, 2008)

The study indicates that compared to Bishop's Stortford, Hertford and Ware, Sawbridgeworth is not considered a prime commercial property location and as such was not subject to the full assessments carried out for the three larger towns. Notwithstanding this, the existing employment locations at Clarklands Industrial Estate (just north of the town adjacent to Parsonage Farm), the Italstyle estate (near the district boundary north of Harlow) and the Hayters site (in nearby Spellbrook village) were recommended for safeguarding for future employment uses as they provide a vital role for local businesses. The Maltings located just over the district boundary in Essex, functions very much as part of the town and is a key employment location and a thriving antiques trading centre. Sawbridgeworth's role in employment terms is limited by its lack of direct major road connections, with access to the M11 being sought through either Bishop's Stortford or Harlow. Sawbridgeworth is not considered in the study for future large-scale employment development.

East Herts Economic Development Strategy (2007-2012)

The strategy confirms the role Sawbridgeworth plays in the district's economy. As a traditional market town, it is an urban centre in a rural area, but being mid-way between Bishop's Stortford and Harlow is affected by the larger centres which compete with but also compliment the smaller town. Tourism plays a part in the economy of the town via its connections with the Stort Valley.

Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)

Whilst Sawbridgeworth did not feature in this study, the merits of strategic employment land at Bishop's Stortford and Harlow North were considered in some detail. The study suggests that the potential strategic significance of Bishop's Stortford is related not to existing sites/ economic activities, but to its location adjacent to the M11 mid-way between London and Cambridge and immediately adjacent to Stansted Airport²⁸. Similarly, land to the north of Harlow benefits from being well located to a strong critical mass of employment focussed in Temple Fields on the north side of Harlow and The Pinnacles in the west of Harlow. Disincentives relate to the limited strength of road connections to the M11 and perceptions of the town in terms of office development and the perceived lack of the necessary socio-economic/ occupational profile of the town. The location should be considered for strategic scale employment if the wider North of Harlow development is progressed as it is likely that suitable road infrastructure would be viable with this scale of development.

Retail and Town Centres Study (Chase & Partners, 2008)

According to the study there are 63 retail and service units in the town centre, including 8 convenience units (equating to 13% of the total, which is comparable to the national average of 9%). There are 20 comparison units equating to 32% of the total, which is significantly below the national average of 46%. There are large numbers of independent retailers with no major retailers in the town centre apart from Budgens. The vacancy rate of 8% is below the national average of 10%.

The level of services on offer is good considering the proximity of both Harlow and Bishop's Stortford, both only short drives along the A1184. There is a post office, newsagent, a number of restaurants, pharmacies and two banks in Lloyds TSB and Barclays. The study does not consider that there is any growth potential in the town centre.

The study recommends designation of Sawbridgeworth as a 'Minor Town Centre'. This reflects its small size and limited retail role. Like Buntingford, this town is not and never will be a significant comparison retailing destination but provided it has adequate food stores and essential services, it fulfils its role.

²⁸ "Stansted Airport is the only London airport with space and permission to grow. It is also the most modern." (Page 94).

Flooding and Water Infrastructure Documents:

Strategic Flood Risk Assessment (2008)

Sawbridgeworth lies next to the River Stort. Hydrological modelling has established the extent of Flood Zone 3 (High Risk), and Flood Zone 2 (Medium Risk), and Flood Zone 1 (Low Risk). There are extensive areas of Flood Zone 1 to the west of the river. However, there are extensive areas of Flood Zone 2 and 3 along the eastern side of the town along the river. Topic Assessment 10: Flood Risk includes a more detailed area-specific assessment, and this has been considered in the evaluation of the Sawbridgeworth Areas of Search (nos. 14-17) set out in Section 4.7.

Rye Meads Water Cycle Strategy (Hyder, 2009)

Sawbridgeworth lies within the catchment of the Rye Meads Waste Water Treatment Works, lying on one of the four main trunk sewers connecting to the Works. With its proximity to the River Stort, part of the town is at risk of flooding, and conversely, the river in this location has poor water quality with harmful levels of chemicals. A planned upgrade to the sewer network through Sawbridgeworth could increase the potential for some development in the town depending on the scale and location of such development. Local sewer upgrades will still be required and development will need to be phased carefully to take account of the time to implement the trunk sewer upgrade.

Infrastructure Documents:

Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

The study provides useful information and estimated costs for most of the major types of infrastructure required to support growth. It covers the functions of Hertfordshire County Council (highways, education, children's services, libraries, fire and rescue, waste disposal) the District Councils (open space, sport and recreation, waste collection), other public sector agencies (NHS, police, ambulance service) as well as private sector infrastructure providers (gas, electricity, water supply and sewerage). It was not possible for the study to specify new items of infrastructure in particular locations, and therefore it is understood that this work will need to be undertaken alongside the emerging District strategy.

Further to the main report, the Hertfordshire Infrastructure Investment Strategy (HIIS) Partnership commissioned a more detailed report to identify transport infrastructure and associated costs required as a result of targeted Regional Spatial Strategy (RSS) growth in Hertfordshire to 2031.

Transport Documents:

Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009)

The Report had the objective of providing a means by which the partners could prioritise and bid for infrastructure 'interventions' (schemes, 'soft' measures or initiatives).

The majority of interventions listed within the document are linked to locations outside the district; however, in respect of East Herts specifically, a few areas

to be addressed in Sawbridgeworth itself, or for routes leading to it, have been identified. The issues raised include:

- A1184/Station Road/West Road Junction (A1184 S Approach)
- A1184/High Wych Road Junction (A1184 N Approach); and
- Town Centre Bus routes.

Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)

LTP3 sets the framework for achieving a better transport system for all over a plan period of 20 years (2011-31). This plan will build upon the successes of LTP2 (which are summarised in the LTP2 Annual Progress Reports from 2007/08 to 2010/11) and focus on delivering the goals of supporting economic growth, achieving behavioural change, enhancing the quality of life, safety and security and addressing transport's effect on climate change. The LTP comprises 3 main volumes and a number of associated daughter documents.

It is recognised in the LTP that the majority of schemes will be identified through the rolling programme of Urban Transport Plans.

Bishop's Stortford and Sawbridgeworth Urban Transport Plan (forthcoming)

This study will take account of transport modelling and the scenarios arising from the District Plan strategy selection process. It is anticipated that this study will be finalised to support the submission version of the District Plan Strategy.

Sport and Leisure Documents:

PPG17 Audit and Assessment (PMP, 2005)

The Assessment identified that the open spaces of all typologies within Sawbridgeworth were very well used and highly valued with some pitches and facilities suffering from overuse and being in need of better maintenance, particularly in the tennis courts at Vantorts Close. At the time of the survey there was a high level of satisfaction with the amount of open space within the town. Sawbridgeworth has a statistical over-provision in the majority of open space typologies, particularly parks and gardens due to the presence of Pishiobury Park to the south of the town. There was however, a slight under-provision in Local Areas of Play for children and young people despite the Bullfields Playing Area being held in trust for the towns' younger population, and outdoor pitches. It should be noted that since the Assessment, the Town Council has increased and improved the size of play areas within its management and The Leventhorpe School has increased its facilities.

Consultation with Sawbridgeworth Sports Association identified the perceived need for additional pitches in the Sawbridgeworth area. The Sawbridgeworth Sports Association is currently investigating the possibility of acquiring land adjacent to Leventhorpe School for the location of several outdoor sports facilities in a hub site. The football field owned by Sawbridgeworth Football Club could be sold if the other site is procured, and used to part fund the development.

East Herts Assessment of Sports Facilities (East Herts Council, June 2011)

The ongoing Assessment identified a perceived need for a greater number of indoor facilities such as health and fitness centres, sports halls and swimming pools. Within Sawbridgeworth, the majority of the needs of the town are met within The Leventhorpe School which has a Public Use Agreement in place. Without this provision, there would be a significant under-provision of facilities within the town. The Assessment identified a specific need for flood lighting at Sawbridgeworth Tennis Club to enable later playing times and an artificial turf pitch in the town for a variety of uses.

Playing Pitch Strategy (2010)

Sawbridgeworth falls within the M11 Stort Corridor used as an assessment tool for the purpose of the Playing Pitch Strategy. There is a significant demand for junior and mini football and rugby facilities in the M11 Stort Corridor (including Bishop's Stortford and Sawbridgeworth). This level of demand reduces for adult players resulting in a slight over-supply of adult facilities. In the short term, one option to redress these demand and supply issues is to realign adult pitches into a junior pitches. However, this approach prevents an effective management programme for pitch rotation, i.e. allowing pitches to rest periodically to prevent over-play and damage to popular pitches. The longer-term approach would be to facilitate more community use of education facilities and the creation of a new multi-pitch facility providing for a range of users. An issue for all football and rugby clubs across the district is the lack of a suitable home ground. The District's football and rugby clubs field many teams which cannot all be accommodated on their home grounds thus resulting in the over-use of public pitches for training and match events. A purpose-built facility used as a 'home ground' would reduce this informal use and enable clubs to apply for funding for development.

The strategy indicates a deficiency of cricket pitches across the area. Increased use of school pitches and the creation of a multi-pitch site are two suggestions made to address this deficiency. Hockey is also identified as having a deficiency of Synthetic Turf Pitches (STPs) in the area. Proposals to relocate two secondary schools in Bishop's Stortford are unclear as yet regarding the overall changes to the pitch stock. This could provide significant opportunities for higher quality and more accessible pitches in the area, including STPs.

Another potential solution for the M11 Stort Corridor area is to secure community access to the Jobbers Wood Playing Fields to the west of Bishop's Stortford which currently has restrictive conditions preventing non-school use.

Green Infrastructure Documents:

Harlow Area Green Infrastructure Plan (2005)²⁹

This study sets out a strategic vision for planning new and enhanced Green spaces and routes for an area centred on Harlow and stretching from Bishop's Stortford and Hatfield Forest in the north and east to Epping Forest and the Lee Valley Regional Park in the south and west with the Rivers Lee and Stort and their valleys forming the connecting link between these main

²⁹ www.harlow.gov.uk/gip

cornerstones. A delivery plan for particular projects in the Green Infrastructure Plan, focusing on the existing built-up area and the Stort Valley, was published in 2010.

East Herts Green Infrastructure Plan (2011)

The plan suggests that for Sawbridgeworth, the most important green infrastructure elements are those provided by the Stort Valley. The valley defines the landscape in the wider area and divides Sawbridgeworth from neighbouring Lower Sheering. It is important ecologically and also in terms of urban cooling given the lack of urban green features such as trees in the historic core of the town. The plan cites that *“the setting of the Stort Valley is impaired to the north of Sawbridgeworth and could be improved with small scale wetland planting as part of a package of measures to deliver proposals in the Stort Valley as identified in the Harlow GI Plan and the Stort Valley Feasibility Study, e.g. that structural green infrastructure provision, whilst buffering detractors and edges, should not detract from the more open landscape character here”*.

The plan identifies the Rivers Nursery Orchard as an important feature of green infrastructure for Sawbridgeworth. *“The Rivers Nursery site at Sawbridgeworth has historic importance for fruit production and breeding and is cited by the East Herts Core Strategy Issues and Options as one of the open spaces of particular importance to the settlement’s character. Recognising multi-functional values of historic orchards in the District is important”*. The orchard is of recreational, historical and ecological importance for the town.

Small areas of the District along its eastern and southeast border (e.g. Sawbridgeworth) fall within the Essex Coast and Growth Areas Higher Level Stewardship (HLS) Target Area. HLS schemes which will be supported within this area include those which seek to maintain, restore or create wet woodland or ancient semi-natural woodland. An opportunity therefore exists to benefit both biodiversity and the production of timber and/or bio-fuels by tree planting, support for natural woodland expansion or the bringing of existing woodland under management such as coppicing.

Issues and Options Consultation Feedback (autumn 2010)

The Issues and Options consultation brought forward many comments regarding the future growth of Sawbridgeworth and also views on preferred development density. The following section details the pertinent points of the many representations, but, due to the purpose of the consultation having been to elicit representations of a strategic nature, it does not report those elements of submissions relating to the promotion of specific individual sites.

Representations received from specific consultees included the following points:

Hertfordshire Biological Records Office does not support options that involve developing outside the existing built-up area of the town.

Epping Forest District Council states that any development within the town must ensure that the separate identity of Lower Sheering remains distinct and that the Conservation Areas are respected.

The Environment Agency identified that parts of the existing built-up area of the town are at risk of flooding and should be avoided. Also, that the Sawbridgeworth Brook which runs alongside the west of the town, will require a buffer should development occur in this direction.

Essex County Council cites that: *Development and growth proposed for Sawbridgeworth will inevitably impact on the A1184 and Harlow in general. The County Council considers that consideration should be given to the need for capacity improvements together with sustainable transport links. Discussions with East Herts are therefore welcomed.*

Hertfordshire County Council Passenger Transport Unit indicated that development would need to be located where existing commercial bus services are able to be improved or accessed. As such, although they would prefer development to be located within the existing built-up area of the town they acknowledge that much of the town is not accessible to bus services. Their second preference was to the south west followed by the north as commercial services could be extended more easily in these directions.

Thames Water Property Services cited that they could not be certain about the potential impact on their services without further details. However, they indicated that development in Sawbridgeworth would have an impact on Rye Meads Sewage Treatment Works.

Hertfordshire County Council – Property:

There are five primary schools in the planning area, which includes High Wych and Spellbrook - [Fawbert & Barnard Infant's](#) (2FE), [High Wych C of E Primary](#) (1FE), [Mandeville Primary](#) (1FE), [Reedings Junior](#) (2FE) and [Spellbrook Primary](#) (½FE).

Sawbridgeworth Primary Schools	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast
Total	135	112	112	113	111	119	115	115

There is a shortage of places in Sawbridgeworth town and any new housing is likely to generate a need for additional school places. The site capacity of the existing schools will not enable their expansion. However, although Mandeville is full, as it is located on the edge of the town, it may be possible to expand it to 2FE if the adjacent land is allocated for this purpose. This land is not in HCC ownership. Otherwise, if any further housing is proposed in the town a new 2FE school site will be required.

In Spellbrook and High Wych GP registration data shows that currently there are fewer children living in these villages than there are places available. Capacity will need to be monitored to assess any impact of new housing in these areas.

Other comments

Statistically the majority of respondents to the consultation would prefer to see development contained within the existing built-up area, although it was recognised that there is already congestion and infrastructure concerns and a lack of available locations for development. Where development must occur on greenfield sites, respondents state that these should be located as close to the existing built-up area as possible, ensuring they are well connected to the town centre and services. A by-pass was suggested in order to ease congestion and form a new development boundary. However, at the previous awareness raising sessions held with residents this received a more mixed response with concerns raised that by by-passing traffic away from the town centre this would have a negative effect on businesses that benefit from passing traffic to support their trade. There was a general desire to improve the vitality of the town centre. Areas vulnerable to flooding and sensitive environmental assets should be protected from development and the character of the historic town centre and conservation area should be preserved.

Ware

Ware

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy.

The second part of this section sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

The documents in the first part of this section have been grouped as follows:

Town/Community Documents:

- N/A (N.B. While there is currently no Town Plan in place for Ware, it is understood that a Neighbourhood Plan is likely to be developed in due course).

Sustainability Documents:

- Sustainability Appraisal Scoping Report (Scott Wilson, 2010)

- Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Housing Documents:

- Strategic Housing Market Assessment (ORS, 2010)
- East Hertfordshire Population & Household Forecasts – Parish Groupings and Towns (Edge Analytics, May 2012)

Land Availability Documents:

- The Strategic Land Availability Assessment (East Herts Council, 2012)

Economy Documents (Employment/Retail):

- Employment Land and Policy Review (Halcrow, 2008)
- East Herts Economic Development Strategy 2007-2012 (East Herts Council, 2007)
- Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)
- Retail and Town Centres Study (Chase & Partners, 2008)
- Market Town Benchmarking Ware 2011 Annual Report (Action for Market Towns, January 2012)

Flooding and Water Infrastructure Documents:

- Strategic Flood Risk Assessment (East Herts Council, 2008)
- Rye Meads Water Cycle Strategy (Hyder, 2009)

Minerals and Waste Documents:

- Waste Site Allocations Pre-Submission Document (Hertfordshire County Council, 2012)

Infrastructure Documents:

- Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

Transport Documents:

- Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009)
- Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)
- Hertford and Ware Urban Transport Plan (HCC, November 2010)

Sport and Leisure Documents:

- PPG17 Audit and Assessment (PMP, 2005)
- East Herts Assessment of Sports Facilities (East Herts Council, June 2011)
- East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

Green Infrastructure Documents:

- East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

Sustainability Documents:

Sustainability Appraisal Scoping Report (Scott Wilson, 2010)

Explanation of the Council's approach to sustainability appraisal is contained in Section 1.12 of the Supporting Document. The views of a number of consultees on a draft of the Scoping Report were sought, with those bodies relating specifically to Ware including: Ware Town Council, Abbeyfield, Hertford & Ware Society; The Ware Society; Ware Rotary Club, Fanhams Hall Residents Association, and Christ Church.

The Scoping Report established a Sustainability Appraisal Framework including spatial areas and nine assessment topics. Six 'Spatial Areas' were identified as a planning tool to facilitate consideration of the strategic planning functions of different parts of the district. Broadly, these were based on Housing Market Areas plus consideration of additional functional relationships.

In terms of the Hertford-Ware Spatial Area, it is noted that the Hertford and Ware Urban Transport Plan (UTP) provides the following objectives:

- Transport should support new development and facilitate economic prosperity within Hertford and Ware;
- Transport should be integrated and reliable, allowing easy access to employment, leisure and key facilities and services for all;
- UTP schemes should be safe and efficient as possible and focus on encouraging less car use and promoting sustainable and healthy travel choices;
- The UTP should deliver value for money to local people;
- The UTP should improve the quality of life for residents and visitors alike; and
- The UTP programme should improve the local environment and respect the heritage of the study area.

Hertford and Ware are two of the primary settlements within East Herts. They are connected by the A119 as well as the Hertford East branch of the West Anglia Main Line. They are characterised by relatively high levels of affluence and employment, high house prices and high levels of out commuting / poor levels of self-containment. Hertford and Ware have been considered as satellite settlements to Cheshunt based on the levels of commuting from these towns to Cheshunt. However, as Cheshunt lies outside East Herts the focus of attention within this section is on the dynamics within and between Hertford and Ware.

In terms of Ware specifically, there are 9,221 employed residents and a workplace population of 9,625. The town has 3,371 people (approx. 37%) who live and work in Hertford. While this means that approximately 63% of residents commute outside the town for work there is still net in-commuting of 404. Approximately 64% use the car to get to work while only 12% rely on public transport. However, 14% of residents commute either by foot or bicycle.

Approximately 58% of residents work in East Herts, 18% in the rest of Hertfordshire, 7% in the rest of the East of England, 16% in Greater London and 1% in other regions. As could be expected, there are strong commuting

relationships between Hertford and the nearby settlements such as Hertford, Broxbourne and Harlow.

There is particularly heavy congestion between Hertford and Ware. This is partially due to the 1,218 commuters travelling from Ware to Hertford who pass the 786 commuters travelling from Hertford to Ware everyday.

The Area Transport Plan for Hertford and Ware states that these historic market towns suffer from associated traffic and environmental problems, partly due to the central medieval street patterns.

The Scoping Report comments on what is likely to happen if a District Plan is not produced. Without the plan it is noted that there are significant areas of growth surrounding the Hertford-Ware Area with three nearby KCDCs bringing forward high levels of housing and employment. Hertford and Ware have strong functional relationships with these areas in terms of commuting and housing markets. It is difficult to assess what the situation will be without the plan but it can reasonably be assumed that without the appropriate policies in place, lower levels of containment would be experienced in the Hertford-Ware area given the greater selection and variety of jobs, services and entertainment facilities that can be anticipated in the surrounding areas. This situation would further increase congestion within the area.

In terms of what issues should be a particular focus for the appraisal, it is noted that, in relation to the Hertford-Ware area, these should include:

- Increasing more sustainable modes of transport
- Improving access to housing and services
- Housing affordability.

The Scoping Report also addressed a number of assessment topics. Many of the issues apply district-wide and have already been addressed in Chapter 2. The key messages in the Scoping Report in relation to Ware are:

- Air Quality – in respect of Ware, it was noted that the Council had received funding for carrying out a detailed assessment of the air quality in Ware near to Viaduct Road.
- Biodiversity - 10 Key Biodiversity Areas have been identified within East Herts and, in the general Hertford/Ware environs, these include:
 - River Ash Valley
 - Lea Valley³⁰
 - Rib Valley
 - Lower Mimram/Lower Beane/Bramfield Plateau.
- Climate Change and Flood Risk – within East Herts, main river flooding poses the greatest flood risk, particularly in the river corridors running through the urban areas of Hertford, Ware and Bishop's Stortford.

³⁰ *Lea Valley is also of Regional Importance*

The extensive floodplains provide some natural storage and reduce the risk to urban areas, including Hertford. Interventions in the Middle Lee may help reduce flood risk downstream and attenuating water in the Middle Lee could also be part of a longer term option to reduce flood risk in the Lower Lee.

For East Herts, without the plan there is likely to be further risk of flooding within the urban areas of Hertford, Ware, and Bishop's Stortford. However, the plan should provide assistance in minimising this risk.

- Health and Wellbeing – in respect of Educational attainment in East Herts, this is generally very high with 72.8% of pupils in East Herts achieving five or more GCSEs with grades of A* to C. This compares favourably with Hertfordshire (55.9%) and national (46.8%) averages. Schools perform well in terms of A-levels and in 2006, the average points score per examination entry in East Herts was 213.4. This is above both Hertfordshire (207.1) and national (207.5) averages. However, there are isolated pockets of relative deprivation in this domain within, inter alia, Ware.

There is also a need to ensure that the equality, health and social care needs of a growing and ageing population are met.

- Economy and Employment – it was noted that one of the major employers in the district is Glaxo Smith Kline at Ware. However, it was also referenced that in 2009 GlaxoSmithKline announced the loss of 600 jobs at its Ware facility.
- Historic Environment – no findings specific to Ware, and the issues addressed are covered in Chapter 2 of the Supporting Document and the Historic Assets topic assessment.
- Housing – no comments specific to Ware, and the issues addressed are covered in Chapter 2 of the Supporting Document.
- Land – no comments specific to Ware, and the issues addressed are covered in Chapter 2 of the Supporting Document, and the Green Belt topic assessments.
- Landscape – no comments specific to Ware, but draws attention to the need to address fragmented landscapes, including features such as hedgerows.
- Transport – No findings specific to Ware; however, housing growth appears to drive higher projected traffic growth in East Herts than in other districts within the County.
- Water – most of the issues are addressed in Chapter 2 of the Supporting Document. However, the study also notes that the Environment Agency's general classification for the area is a major aquifer, and

specifically mentioned is the area around Hertford and Ware, which is the district's major area of industrial activity. Other parts of Hertfordshire are classed as non-aquifer. Major aquifers are very sensitive to potential pollution.

- European Sites – this relates to the European Habitats Directive. This will be assessed in Chapter 5 of the Supporting Document.

Issues and Options Sustainability Appraisal (Scott Wilson, 2010)

Sustainability Appraisal of the Issues and Options Consultation document was undertaken using the SA Framework established by the SA Scoping Report. The Issues and Options document was a discussion paper and therefore did not propose any development options. Therefore the appraisal was inevitably high-level.

In terms of the appraisal against six spatial areas, it was noted that in the Hertford-Ware area, that greater levels of development within the area brought forward through all potential options will help to ease housing affordability issues.

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.

Options 2, 3, 4 and 5 (growth options outside of the town centre, to the north; east; south-east; and south-west, respectively) 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.

In respect of appraisal against topic 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, the outcomes for Ware were:

- Air Quality – 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.

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. 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.

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 - 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.

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.

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 and Flood Risk – Any growth is likely to lead to an increase in greenhouse gas emissions. However development can be designed and built 'sustainably'. Options 2, 3, 4 and 5 could lead to increased congestion and reliance on unsustainable forms of transport. Options 1 and 4 may lead to development within areas of flood risk.
- Community and Wellbeing – Although Option 5 would be in close proximity to existing schools, this 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 – 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 – 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. Option 2 may lead to negative direct effects on the Registered Parks and Gardens in this area.

- Housing – 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.

The delivery of housing will lead to beneficial effects in terms of the provision of affordable housing and helping to ease concerns over affordability. Options 2, 3, 4 and 5 would require development on greenfield land and would therefore not contribute towards national PDL targets. 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.

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

In respect of mitigation measures, the Issues and Options Sustainability Appraisal made the following recommendations with regard to Ware to help to

improve the sustainability of current options as well as sustainability considerations to guide the Council in development of the Core Strategy.

In terms of the appraisal against six spatial areas, development within the Hertford-Ware area may require demand management measures to discourage additional congestion and minimise trip generation.

- Air Quality – 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 - 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 and Flood Risk – 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 – 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 – The use of agricultural land for housing development should be avoided if possible.
- Historic Environment – Strong safeguarding policies regarding impacts on Conservation Areas will be required if development is focused within the town centre. Development which may lead to direct negative effects on the registered Parks and Gardens in the area should be avoided.
- Housing – No comments.
- Land – 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 – Coalescence between Ware and surrounding settlements should be avoided.
- Transport – 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 – Strong policies are required to minimise water use and maximise water efficiency. Development within groundwater protection zones should be avoided

Housing Documents:

Strategic Housing Market Assessment (ORS, 2010)

Ware is located within the A10 Corridor Housing Market Area. The study identifies close travel-to work patterns between Hertford and Ware, and between both towns and Hoddesdon/Cheshunt. The report highlights the fact that, in terms of employment, Ware scores poorly in containing its working population, with below 50% both living and working in the town.

Net migration from Broxbourne to East Herts between 2002 and 2007 exceeded 1000 people.

East Hertfordshire Population & Household Forecasts – Parish Groupings and Towns (Edge Analytics, May 2012)

This technical work generates a number of different demographic scenarios at the Sub-District level, including for each town. Whilst this information does not provide the ‘answer’ to the level of housing growth in a particular area, it can be used as the starting point for plan-making purposes that provides an indication of the level of housing required that then needs to be tested against planning policy, physical and environmental considerations. It may be the case that, in planning terms, a particular location cannot accommodate the level of development required to meet its housing needs. Equally, there may be valid planning reasons why a particular location should accommodate more than its forecasted growth. The following outputs were generated for Ware:

Scenario	Household 2010 - 2033 No.	Change %	Average Dwellings Per Year	20 Year Total
Ware Town				
Sub-National Population Projections 2010 Nil-Net Migration	2,922	35.5	129	2,580
Natural Change	924	11.2	41	820
	602	7.3	27	540

Migration-Led	2,619	31.8	116	2,320
Completion Rate - 10 Year Average	2,059	25.0	91	1,820
Ware and Central Southern Parishes				
Sub-National Population Projections 2010	5,342	36.7	237	4,740
Nil-Net Migration	1,955	13.4	87	1,740
Natural Change	1,606	11	71	1,420
Migration-Led	4,824	33.1	214	4,280
Completion Rate - 10 Year Average	2,973	20.4	132	2,640

Land Availability Documents:

The Strategic Land Availability Assessment (East Herts Council, 2012)

The SLAA considers the likelihood of sites coming forward for development within the built-up areas of the Six Main Settlements and Category 1 Villages in East Herts. It assesses the availability, suitability and achievability of sites and was subject to stakeholder engagement in May/June 2012. For the built-up area of Ware the study concludes that at least 147 dwellings would be built over the plan period, including 72 in the next five years.

In September 2011, the Council initiated the SLAA Partnership to obtain feedback from stakeholders regarding deliverability of development and strategic planning from the perspective of the market. In respect of Ware, general comments included:

- Employment issues over whether the market is strong in Ware and whether or not it is over-supplied
- School provision availability & a growing problem with a shortage of spaces
- Green infrastructure should be integrated into plans, including management as public open space. While this could cause viability issues as the costs would increase, strategic landscaping could be created around the town
- The statistics show there is already leakage of expenditure to neighbouring settlements and any by-pass provided as part of development would make it easier to travel out of Ware to elsewhere.
- In the east of Ware there is only one road into the centre of town which already suffers from congestion. The Widbury Hill development site will only exacerbate existing problems. Any further development in this direction will cause major traffic impacts
- Highways & congestion issues in the town generally
- Coalescence issues raised with Great Amwell and also that Hertford and Ware need their own identities.
- Floodplain issues.

Economy Documents (Employment/Retail):

Employment Land and Policy Review (Halcrow, 2008)

This study notes that Ware has a high proportion of B1 employment land (20 ha), and that this is mostly due to the presence of the GSK site which is the biggest single employment site in East Herts and falls under the B1 use class (offices, research and development). Employment land in Ware appears to be the most flexible in the district, but the large GSK site is a major factor³¹.

Under the study's traffic light system, Ware has the highest proportion of employment land rated as green within the district, with the GSK site again being a major contributing factor. The ratings for all of the employment sites that were subject to appraisal in the town for the study are:

- Broadmeads (Green)
- Crane Mead Business Park (Amber)
- Ermine Point Business Park & Gentlemen's Field (Green)
- GSK (Green)
- Marsh Lane (Amber)
- Watton Business Centre (Green)³²
- Widbury Hill, Star Street (Amber)³³

In terms of new employment provision it was noted that, as with Bishop's Stortford and Hertford, given the urban concentration in Ware, and the limited land available, it is considered unlikely that significant employment land opportunities exist in the urban area beyond those already in employment use. Therefore consideration will need to be given to new allocations as part of any urban extensions proposed.

East Herts Economic Development Strategy 2007-2012 (East Herts Council, 2007)

This document was produced by the Council in order to help provide a framework for realising economic development goals.

In respect of the market town of Ware, the study notes that it has excellent links to London via its railway station and that the A10 provides road linkage to London and to Cambridge with excellent access to the M11 corridor.

Ware is a market town with a population of around 17,800. The town centre provides a wide variety of small specialist shops with a small number of major retailers. During 2006/7 the Council implemented a project to regenerate Ware Charter Market, which has so far been highly successful. Herts Regional College and Wodson Park Sports Centre are also based in the town.

³¹ Flexibility refers to a site's potential for in-situ expansion or extension (i.e. without expanding the boundaries of the site).

³² While this site has been rated green it should be noted that it has extant permission for a mixed use development, primarily comprising retail.

³³ Since the completion of this study a large part of the Employment Area has been granted permission for a mixed use scheme, primarily comprising residential.

Ware is home to East Herts' largest employer, GlaxoSmithKline. Ware also benefits from being part of a Town Centre Partnership.

In terms of Rural-Urban Inter-Dependency, market towns are viewed as being both urban and rural – they are the main urban settlements within their local rural area. However, in a regional scale they tend to be perceived as rural in scale and nature. Ware tends to exhibit traditional market town characteristics and is noted as having a high quality environment for heritage and visitor attractions.

Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)

This study notes that the GSK site is of strategic importance to its key sector. It employs around 1,600 persons and is considered accessible, providing a reasonable level of access to the strategic road network. Located close to Ware Town Centre, its environmental quality is high. While reasonably intensively used, any further development is likely to depend on the strategic decisions of the business.

No other employment site within the town features in the Study.

Retail and Town Centres Study (Chase & Partners, 2008)

This study identified that there were 177 retail and service units in the town. At the time that the study was undertaken there were 17 convenience units in the centre equating to 10% of the total which was in line with the national average, though the large Tesco foodstore was the most significant of these. There were 54 comparison units (31%), which is much lower than the national average (46%), and provision of services was above average (54% in Ware against 33% nationally). The vacancy rate of 6% was considerably lower than the national picture (11%) at the time. Three major retailers³⁴ were identified in Ware - Boots, Clinton Cards and Tesco, with a total of 20 multiple retailers³⁵ across a variety of goods categories trading in the town. While it was recognised that there are no retail warehouse parks serving Ware, the Van Hage Garden Centre, a significant retailing destination on the outskirts of the town at Great Amwell, was noted.

Ware was considered to be well connected to all parts of its environs and generally presented a high quality environment which made a positive contribution to the town's vitality and viability. The town was considered to be almost self-sufficient in terms of convenience goods shopping with local residents more likely than not to shop locally and generally retaining much of its pool of expenditure in this respect. For convenience goods, 1,233 sqm gross floorspace requirement for the town was identified for the period 2008-2021.

As Ware does not have a significant comparison goods offer, this results in expenditure for this area being spent away from the town, mostly outside of the district.

³⁴ Defined by Goad as retailers (approximately 27 national multiples), whose strong branding and comprehensive product mix can be sufficient in itself to attract consumers to a centre.

³⁵ Defined by Goad as being part of a network or nine or more outlets

There are few obvious opportunities for development or extension to the existing town centre, through there may be opportunities for intensification of the use of some sites. The offices and large stores between Star Street and the river is one example. Similarly, the small town centre car parks throughout the centre could be developed, though at the expense of reducing parking provision.

Ware is a smaller town centre whose role is very much in the provision of food shopping and services. The Tesco store meets the first requirement and there are a number of other uses such as banks, building societies, post office and take-aways to meet the local population's service needs. While there is little in the way of comparison goods offer, this is not necessary for Ware to fulfil its role. The study therefore recommends the designation of Ware as a 'Minor Town Centre'.

Market Town Benchmarking Ware 2011 Annual Report (Action for Market Towns, January 2012)

Market Town Benchmarking, involving the capturing of data on 12 Key Performance Indicators selected by those involved in town centre management, has been developed in order to understand, measure, evaluate and ultimately improve town centres.

The Benchmarking assesses settlements and rates them against five categories of town centre:

- Traditional Market Town: High percentage of convenience outlets and independent retailers serving local population and including significant % of food and drink outlets.
- A Mixed Towns Centre Economy: An evolving balance of convenience and comparison stores, significant percentage of food and drink outlets with mixed independent and multiple ownership and balance of local, visiting and tourist shoppers.
- A Visitor Destination: A high percentage of shoppers from outside the local area and a significant percentage of food and drink outlets with a significant proportion of comparison stores in independent ownership.
- A Key Attractors Town: A higher percentage of multiples including 'key attractor' stores selling comparison goods and balance of local and visiting shoppers.
- A Failing (or Re-defined) Town Centre: This can evolve from any of the other types and is characterised by a low percentage of shops that are mostly independent and selling a mix of convenience and comparison goods with mainly local shoppers and catering confined to A5 hot food takeaway outlets. Additional indicators of trends including footfall, vacancy rates and retail rents will further highlight such towns where their function may merit redefinition.

For Ware Town Centre, 40% of the commercial units recorded were in A1 use. Traditionally A1 units have formed the highest percentage of the commercial offering in a town centre and Ware is no different. However, Ware town centre does include a high level of B1 Business and D1 Non

Residential Institution units compared to the Regional and National averages. 12% of the 220 commercial units in the town are in B1 (South East Regional 8%, 3% nationally) and 11% of units are Non Residential Institutions, (compared to 8% regionally, and 6% nationally).

Ware was seen as having a balanced comparison and convenience offering, with the A1 commercial offering nearing the traditional two thirds comparison/one third convenience balance within town centres. Convenience retailing offers a vital function in Ware.

In terms of being both a local and regional town, Ware town centre includes twice as many regional A1 stores (16%) than the national average (8%), while 69% of A1 commercial units were independents.

The report highlights the positive aspects of Ware as being that:

- it has a high footfall in the town centre (especially on non-market days where the 207 people per 10 minutes 10am – 1pm was significantly higher than 83 nationally) ;
- the town attracts local customers (although competition from other places was seen as an issue) and 61% of businesses surveyed had been operating in the town for over 10 years;
- survey respondents reported noticeably higher business confidence than the national average;
- Town Centre Users were positive about the food and drink offering in the town;
- 95% of town centre users were complementary about the physical appearance of the town centre; and
- the area rated as positive by 70% of town centre users for 'ease of walking around'.

Negative points of the town centre raised by the study include:

- a lack of variety of shops;
- lack of impact of its market (footfall decreasing on market day). However, the location of some traders in Tudor Square may have affected these results, and an increase in car parking occupancy on market day would suggest otherwise;
- car parking fees: 50% of traders reported that 'Car Parking' was a negative issue of operating in Ware Town Centre, mainly fees being too high; and
- rental values (18% higher than the National average).

The findings of the report suggest that Ware holds many of the characteristics of a Traditional Market Town, but with the balanced proportion of convenience and comparison stores and, with a comparatively high number of Regional traders, the town is moving towards a Mixed Towns Centre Economy.

Flooding and Water Infrastructure Documents:

Strategic Flood Risk Assessment (East Herts Council, 2008)

In relation to Ware the Study notes that the River Lea flows through the town. Hydrological modelling has established the extent of Flood Zone 3 (High

Risk), Flood Zone 2 (Medium Risk), and Flood Zone 1 (Low Risk). There are extensive areas of Flood Zone 1 around the town. Flood Zone 2 and 3 is concentrated along the River Lea. Topic Assessment 10: Flood Risk includes a more detailed area-specific assessment, and this has been considered in the evaluation of the Ware Areas of Search (nos. 18-22) set out in Section 4.2.

Rye Meads Water Cycle Strategy (Hyder, 2009)

This study was prepared in response to the requirements of the RSS, which identified capacity constraints at Rye Meads arising from proposed growth, particularly at Stevenage and Harlow. Further information on the Rye Meads issue is provided in Section 2.6: Water of the Supporting Document. The key issues in respect of Ware's infrastructure are as follows:

The River Lee from Ware Lock to Stort was reported to be showing marginal compliance against a River Ecosystem (RE) 2 target, as well as the Lee Navigation between Ware and the confluence with the Lee downstream³⁶.

Water quality has always been an important consideration; however, more stringent standards on river quality (and hence discharges into rivers) than present are likely to be applied by the EA, as the Water Framework Directive (WFD)³⁷ is gradually implemented at a local level.

In terms of water quality in the Ware area, it was noted that the Lee (Navigation) in Hertford and Ware had a moderate ecological status. Its chemical status was not good and the barriers to achieving good status were that in terms of its Phosphate levels, these were poor, flow was not good; and Benzo Perelyene and Indeno Pyrene levels were moderate. The proposed date for achieving good status was given as 2027

The sewerage network that delivers effluent to Rye Meads Waste Water Treatment Works (WwTW) consists of four main trunk sewers, of which the Hertford and Ware trunk sewer is one.

Given that the optioneering process in the report ruled out a new WwTW in or around Welwyn Garden City, Hertford, Ware and Harlow, it was accepted that Rye Meads WwTW would continue to treat wastewater from these settlements, including that from new development sites (although upgrades to the works and associate sewerage network would be required).

³⁶ RE targets represent the water quality standards required for a watercourse to support a certain use, such as recreation, fisheries or abstraction.

³⁷ The European Water Framework Directive (WFD) sets out a strategy for protecting and enhancing the quality of groundwater, rivers, lakes, estuaries and coasts. It introduces the integrated approach to river basin management that the EA is currently applying to the 11 River Basin Districts in England and Wales; identifying and characterising water bodies and protected areas in each district, and the pressures and risks upon them. The risk assessments themselves are used to show the risk that a water body could fail to meet 'good status' by 2015, a key aim of the directive.

In terms of Ware specifically, development would not be constrained by the capacity of the trunk sewer, as the new flows would only be a small proportion of the existing flows at this point in the network. Furthermore, disruptive local network upgrades could be avoided by choosing strategic sites with clear access to the trunk main network. However, such sites could be limited to the east of Ware. It was therefore implicit that outside of this location highly disruptive and costly local network upgrades could be required³⁸.

Minerals and Waste Documents:

Waste Site Allocations Pre-Submission Document (Hertfordshire County Council, 2012)

The Waste Site Allocations document (Pre-Submission version) identifies five existing strategic sites which provide for waste functions beyond the local areas in which they are located. Amongst these sites is included the Westmill Quarry/Landfill site in Ware. Strategic sites are considered essential to the current and future waste management of local authority collected waste in the county. They currently perform a waste management function and are therefore intended to be safeguarded in the Plan.

The Pre-Submission Waste Site Allocations document also identifies 16 allocated sites which the County Council considers to be the most suitable locations to manage the county's existing and future waste arising during the plan period. These sites have been tested through the County Council's site selection methodology and have scored positively in terms of their location, suitability and deliverability during the plan period.

Among these sites (which have been identified as they contain or have been used for waste management provision in the past, or are previously developed site) is included Presdales Pit (AS014). This site was a former mineral extraction site that has never been fully restored after sand and gravel extraction ceased.

Following a Public Examination into the document's soundness due to be held in autumn/winter 2012, the Waste Site Allocations DPD is currently expected to be adopted in spring/summer 2013.

Infrastructure Documents:

Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

The study provides useful information and estimated costs for most of the major types of infrastructure required to support growth. It covers the functions of Hertfordshire County Council (highways, education, children's services, libraries, fire and rescue, waste disposal) the District Councils (open space, sport and recreation, waste collection), other public sector agencies (NHS, police, ambulance service) as well as private sector infrastructure providers (gas, electricity, water supply and sewerage). It was not possible for the study to specify new items of infrastructure in particular locations, and therefore it is understood that this work will need to be undertaken alongside the emerging District strategy.

³⁸ This was confirmed within the Waste Water Impact Topic Assessment in Chapter 3.

Further to the main report, the Hertfordshire Infrastructure Investment Strategy (HIIS) Partnership commissioned a more detailed report to identify transport infrastructure and associated costs required as a result of targeted Regional Spatial Strategy (RSS) growth in Hertfordshire to 2031.

Transport Documents:

The *Hertfordshire Infrastructure & Investment Strategy Transport Technical Report* (URS, November 2009) had the objective of providing a means by which the partners could prioritise and bid for infrastructure 'interventions' (schemes, 'soft' measures or initiatives).

The majority of interventions listed within the document are linked to locations outside the district; however, in respect of East Herts specifically, a few areas to be addressed in Ware itself, or for routes leading to it, have been identified. The issues raised include:

- A602 Ware-Stevenage, Road Improvements;
- A602 Junction with B158;
- Ware High Street; and
- Hertford-Ware Bus Corridor.

Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)

LTP3 sets the framework for achieving a better transport system for all over a plan period of 20 years (2011-31). This plan will build upon the successes of LTP2 (which are summarised in the LTP2 Annual Progress Reports from 2007/08 to 2010/11) and focus on delivering the goals of supporting economic growth, achieving behavioural change, enhancing the quality of life, safety and security and addressing transport's effect on climate change. The LTP comprises 3 main volumes and a number of associated daughter documents.

In terms of Ware, specific mention is made of the need for improvements to the A602 Ware to Stevenage road to be made as part of the A602 corridor strategy. The A602 forms part of the Primary Route Network in Hertfordshire, providing an east-west link between the A10 Great Cambridge Road in Ware and the A1(M) Motorway in Stevenage, as well as between the A414 and the A1(M). It is the main route between Hertford, Ware and Stevenage and is predominantly a rural single carriageway. The strategy for the corridor aims to upgrade the route to provide a higher quality link, to a consistent standard throughout, to deliver a higher service level and provide a safer, more reliable corridor appropriate for a principal route on the network.

The LTP also refers to the system of navigable waterways through the county and that the River Lea [which passes through Ware] is part of this network, from Hertford in the east. Although mainly used for recreation, boating, fishing and walking, it is recognised that there is cycling on the tow paths (a Sustrans route) and that this route may offer further possibilities for sustainable transport.

Other than these strategic issues, the only references to specific schemes concern local improvements involving the Railway Station enhancement and two signal enhancements elsewhere in the town.

It is recognised in the LTP that the majority of schemes will be identified through the rolling programme of Urban Transport Plans.

Hertford and Ware Urban Transport Plan (HCC, November 2010)

Urban Transport Plans (UTPs) are the mechanism utilised by Hertfordshire County Council in order to identify how and where the strategic objectives and targets identified in the county-wide Local Transport Plan (LTP), to which these are daughter documents, can be delivered at a local level.

The main proposals of the Plan seek to improve and join up the existing transport networks and promote healthier and sustainable travel choices. The Plan's short and medium term measures in particular are largely focussed on walking, cycling and passenger transport improvements, with limited proposals for some adjustments to highways, lorry routes, vehicle access and car parking.

For Ware, congestion issues in the town centre, especially the High Street, are identified as a particular problem area to be addressed. However, while the schemes identified within the UTP are presented as a foundation to address most of the issues around access and sustainable modes, it is recognised that this programme will not be able to solve the identified capacity and congestion related issues in a major way. Therefore, it is implicit that further development in the town would result in adding to existing capacity and congestion problems.

As the UTP focuses on the existing built up areas of the two towns, it does not generally assess the impacts of any future development potential for the town. However, there is one notable exception in that, within the longer term measures identified, the potential to introduce a Park and Ride facility to serve both towns (with direct connections to rail stations, a bus and coach interchange and school drop off areas) is included, which would be intended to aid congestion in the area.

Sport and Leisure Documents:

PPG17 Audit and Assessment (PMP, 2005)

This study, involved an assessment of local needs and an audit of open space and indoor sport and recreational facilities, across the whole of East Herts to provide a clear vision and priorities for the future based on local need.

In terms of Ware, there are a number of specific findings, of which some of the important issues raised are discussed below.

A below standard level of provision of Parks and Gardens was identified for Ware; however, as the study divided the district into sub-areas with the Ware grouping also including the settlements of Great Amwell, Hunsdon,

Puckeridge, Standon, Stanstead Abbots, and Thundridge, this may not necessarily be true of the town of Ware on its own.

Wodson Park was identified as having particularly good facilities, both indoor and outdoor. Natural and semi-natural green space provision was also highlighted as good overall, even though not all areas were generally accessible to the public. The area also scored well in terms of green corridors.

However, while allotment provision in Ware was below the local quality standard, it was recognised that this is a demand-led area and that no demand had actually been identified.

In terms of playing space, a deficit was identified in the sub group area.

It should be noted that, given the length of time that has elapsed since the study, some of the findings may not necessarily hold true today, especially those of a site specific nature, where measures may have been undertaken to address deficiencies.

East Herts Assessment of Sports Facilities (East Herts Council, June 2011)

This Assessment undertook a review of the current state of indoor and outdoor sports facilities in the district and proposed local planning standards, as appropriate.

This Assessment shows that East Herts is well served by a range of high quality, indoor and outdoor sports facilities. In general, residents are currently satisfied with the sports and active recreation facilities on offer. Particular issues raised for Ware specifically in the report show that:

- Wodson Park Sports Centre, which offers indoor and outdoor facilities, is a major venue and also provides a significant local resource for the community. The quality of the existing 'public' sports halls should be retained, maintained, and improved to ensure continued community use and long term sustainability. Due to its existing diverse provision and strong user base, this facility has also been identified as an appropriate venue for development as a centre of strategic sporting excellence and also as a venue for the development of any identified specialist facilities and for support facilities associated with these uses. The existing 8-lane athletics track should be maintained and enhanced as the centre for athletics in the district.
- For indoor bowls, it is estimated that, in the longer term, there will be demand for an additional multi-use 2-to-4 rink facility, which, if not met elsewhere, could be provided as a separate facility in the Hertford/Ware area, subject to close liaison with the national governing body.
- There are two public swimming pools in the town - indoor at Fanshawe (with gym); and, outdoor at The Lido (summer only).

- Other small scale facilities that enable sports provision include The Drill Hall, schools, and other private centres (e.g. Allenbury's at GSK).
- Health and fitness centres are available for the public at Fanshawe Swimming Pool and Gym, and private provision is made at Allenbury's Sports and Social Club (GSK) and the Hale Club.

The *East Herts Playing Pitch Strategy* (Knight Kavanagh & Page, July 2010) forms part of the overarching Assessment of Sports Facilities and draws the following conclusions:

There is a significant demand for junior and mini football and rugby facilities in the Hertford-Ware area. This level of demand reduces for adult players resulting in a slight over-supply of adult facilities. In the short term, one option to redress these demand and supply issues would be to realign adult pitches into junior pitches. However, this approach prevents an effective management programme for pitch rotation, i.e. allowing pitches to rest periodically to prevent over-play and damage to popular pitches. The longer-term approach would be to facilitate more community use of education facilities and the creation of a new multi-pitch facility providing for a range of users. An issue for all football and rugby clubs across the district is the lack of a suitable home ground. The District's football clubs field many teams which cannot all be accommodated on their home grounds thus resulting in the over-use of public pitches for training and match events. A purpose-built facility used as a 'home ground' would reduce this informal use and enable clubs to apply for funding for development.

There is also an identified latent demand for more tennis courts. Floodlighting and additional courts are suggested as a means of meeting this demand. The strategy suggests that the slight over-supply of cricket pitches identified should be retained to facilitate increasing demand.

Green Infrastructure Documents:

East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

This report concentrates on the provision of Green Infrastructure in the district and both identifies deficiencies and suggests measures for improvement.

In terms of Ware, there are a number of specific findings. In applying the Natural England Accessible Natural Greenspace standards, it is noted that Ware has poor provision in this category, as well as in provision of space for children and young people. It is suggested that this should be alleviated through creating better public access to the countryside resource that surrounds the settlement, including the Lee and Rib Rivers.

The river corridor between Ware and Hertford has been identified as a key issue to make improved links between the towns and the wider countryside, while also ensuring lateral links across the District, particularly if future growth is considered to the urban fringes.

In terms of the Woodland Trust's Accessible Woodland Standard, mapping the south west of the District surrounding the larger settlements of Hertford and Ware has therefore formed part of the focus for a Woodland Enhancement Zone.

Sound ecosystems are a key part of a green infrastructure network, and proposals should seek to contribute to positive and proactive management of these for community benefit. The focus for this analysis has been the key services of water and air quality. Future development in Ware could place further abstraction pressures on the Lee, heightening the need for positive management of the river network and appropriate wetland expansion.

There is a significant opportunity to enhance and expand wetland character near pinch points such as at Hertford and Ware where the rivers of the District meet. Opportunities for access improvements could also be met through the proposed Hertford and Ware Wetland Enhancements project.

Consideration of the wider farmland landscape shows that to the east of Ware a relatively high proportion of the landscape is managed through Higher Level Stewardship (HLS).

Urban greening, shading and cooling is a key part of community focussed green infrastructure. While analysis concentrated on tree cover, clear links with other functions such as flood attenuation and water management, as part of a climate change adapted response to spatial planning were identified, and this function was cited as particularly relevant to the higher density settlements within the District, such as Ware.

Any future development proposals should therefore take into account proposals in respect of proposed green infrastructure network and projects.

Issues and Options Consultation Feedback (autumn 2010)

The Issues and Options consultation brought forward many comments regarding the future growth of Ware and also views on preferred development density. The following section details the pertinent points of the many representations, but, due to the purpose of the consultation having been to elicit representations of a strategic nature, it does not report those elements of submissions relating to the promotion of specific individual sites.

Representations received from specific consultees included the following points:

Ware Town Council wished to see the retention of the Green Belt and referred to its importance in terms of: preventing overexpansion; preserving the core of the historic market town; providing recreational facilities; and preventing coalescence with other settlements. Concerns were raised over the capacity of Ware to accommodate further development, particularly in relation to the ability of its infrastructure to sustain further growth, specifically citing education; traffic; parking; and sewage issues.

Stanstead Abbots Parish Council supported the avoidance of coalescence into Stanstead Abbots and, therefore considered that option 4 [to the South East] is undesirable.

Epping Forest District Council recognised that, while supporting the town centre as a sustainable location for development, that there was little land available. Therefore growth to the north and east were preferred due to being near to existing services, where land is available for development, and where transport links are nearby. Growth options to the South East and South West were the least favoured, as these are in a flood plain and could cause coalescence with other East Herts settlements.

In terms of density, a higher level was preferred, in order to effectively concentrate homes near services, and to minimise take up of Greenfield land, and land with natural conservation value. It would also make use of the available land in the most efficient way.

Hertfordshire County Council's Passenger Transport Unit expressed views on the growth options and their potential to achieve sustainable bus service provision. These initial comments were developed further during the preparation of the Access to Bus Services and Access to Rail Services Assessments in Chapter 3: Assessment Criteria.

Hertfordshire County Council's Services provided information on various service provision areas. The issues relating specifically to Ware are summarised below.

One of the issues raised was the need for future educational provision in the district. For Ware it identified that for primary education there are seven primary schools in the planning area – [Christ Church \(C of E\) VA Primary and Nursery](#) (1½FE), [Kingshill Infant](#) (2FE), [Priors Wood Primary](#) (1FE), [Sacred Heart Catholic Primary](#) (1FE), [St Catherine's \(C of E\) Primary](#) (1½FE), [St John The Baptist VA C of E Primary](#) (PAN 25) and [Tower Primary](#) (1FE).

Ware Primary Schools	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast
Total	265	244	236	235	244	253	247	247

The forecasts currently indicate that there is sufficient capacity in the short term to meet demand in Ware. However, a need for 0.5 FE is anticipated in the plan period to cater for the needs arising from the existing population and allow a margin. Any new housing is likely to generate a need for additional school places.

For secondary education, Ware forms part of the Hertford and Ware planning area. There are five secondary school located within this area – The [Chauncy](#) (5FE), [Presdales](#) (5½FE), [Richard Hale](#) (5½FE), The [Sele](#) (5FE) and [Simon Balle](#) (PAN 160).

Hertford & Ware Secondary Schools	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast	2023/24 F/cast
Total	790	718	718	728	730	767	774	788	809

Two reviews have been carried out of secondary schools in this area, in 2004 and 2006. Additional capacity may be needed to meet the projected need in the medium term.

Numbers are forecast to increase from 2014/15, when there will be less than 5% surplus capacity. The number of places will need to be increased by 0.5 FE for 2014/15, increasing to an additional 2FE by 2023/24.

If the schools are to be expanded on their existing sites flexible policies may be required as three of them are in the Green Belt.

In order for Chauncy, Presdales and Richard Hale to expand additional playing fields will be required. These may need to be in the form of detached playing fields or all weather pitches.

In terms of Youth Connexions requirements, this body would require access to properties to run youth work/positive activities programmes, information, advice and guidance and targeted support to individuals or groups within significant areas of population. They would expect to deliver services in partnership with the voluntary and community sector as well as the District Council.

The preferred model would be to locate services in the larger towns and have access through community facilities in smaller communities through access to shared use of local facilities. Youth Connexions would prioritise development of sites in the larger areas of population to enable a more diverse and higher quality youth offer whilst working in smaller communities on more limited short-term projects.

In terms of Ware specifically, Youth Connexions look to provide for the Hertford and Ware area. It is noted that Neighbourhood community facilities are used in Hertford. HCC would look to develop a site in partnership with others that could offer a wider range of activities to young people. If located to the east of the town this could possibly offer a facility to also serve Ware³⁹.

Children's Centres should be provided for every 800 children aged 0 to 5. Developments of 2,500 dwellings will require a children's' centre.

Library provision was noted as being a statutory service. Ware library was cited as being in an excellent location adjacent to a public car park. It is located in a listed building with limited access for the disabled and is inadequate for modern service delivery. There is a proposal to relocate the library to the Old Fire Station located to the rear of the existing building and

³⁹ Youth Connexions have since started operating from premises in Marsh Lane, Ware

dispose of the existing building. S106 contributions are being pooled to assist in the implementation of this proposal.

Waste Management/Disposal matters were also raised and it was identified that Ware has one of three Household Waste Recycling Centres (HWRCs) in the district. These are provided by the County Council and are all very popular and largely serve their purpose. However, all three are operating at the limit of their capacity, if not beyond, and would find it difficult to cope with the additional demands that would come from more housing development. The Ware HWRC would therefore need improvement if asked to deal with a larger population.

The assessment of potential need for additional waste facilities in the District, including a Waste Transfer Station to serve the east of the County, resulted in the identification of 'Preferred Waste Areas' in the Hertfordshire Minerals and Waste Framework Waste Site Allocations Issues and Preferred Options 2 November 2009. The Waste Development Authority considered that sites at Westmill and Presdales Pit could be appropriate for such uses, and for a range of other waste uses that may emerge in the coming years.

Adult Care Services (ACS) detailed a number of issues that were generic to the district.

The Environment Agency expressed views regarding flooding and drainage issues for the five growth options, which have been taken into account in the Areas of Search assessments. In respect of development density, no preference was expressed. Decisions on densities will be affected by flood risk considerations and should be informed by the Strategic Flood Risk Assessment. In order to promote sequentially preferable sites it may be necessary to promote higher density developments in order to avoid encroaching into the floodplain. Where flood risk is not a constraint to development, it was considered that lower densities may be achievable. The Agency further opined that the vision would benefit from a direct reference to managing flood risk and using new development to contribute to reducing existing flood risk wherever possible.

Thames Water considered that due to the complexities of the sewerage and water networks, that it was difficult to comment on the impact of new development on its networks prior to more known detailed information on the scale, type and exact location and phasing of development being known. However, it was noted that development should not come forward ahead of any necessary infrastructure upgrades.

Growth in Ware would be served by Rye Meads Sewage Treatment Works and, as such, options for growth should consider the outcomes of the Rye Meads Water Cycle Study.

Hertfordshire Biological Records Centre did not support options 3 [to the East]; 4 [to the South East]; or 5 [to the South West] and considered that the river corridor and associated Wildlife Sites must be protected. Again, in terms

of the Vision, the view was expressed that the natural environment including the river, habitats and the species they support must be protected.

Natural England supported the emerging LDF Vision for Ware.

Lee Valley Regional Park Authority welcomed the references to the Regional Park within this section, but would wish to see the Park referenced in the emerging draft vision. It was particularly concerned about growth to the south east of Ware, because this would impact directly on the Park and also cited the findings of the Sustainability Appraisal which showed that there could be significant negative effects in relation to air quality, biodiversity and green infrastructure, climate change, community and well being, land, landscape and water. Therefore the Authority did not consider that growth in this location would be suitable due to its potential to negatively impact on the Park, its openness, and ecological value, particularly in relation to European designated sites.

Sport England broadly supported the overall vision for the town but considered that the core strategy would need to address the land use implications for Ware of the [then] recently completed playing pitch strategy as deficiencies in the area are particularly significant e.g. the need for additional playing pitches would justify new sites being identified for outdoor sport and/or major new development should incorporate outdoor sports provision.

The Ware Society considered that, in terms of the growth options suggested, the optimum solution for Ware could involve elements of various options, according to its order of preference. This would involve using brownfield town centre sites first; then developing to the north to use good routes for travel and proximity of sport and leisure facilities and primary schools. It considered that development to the South West would again provide good access routes for travel outside Ware and to primary schools and leisure facilities to the north of Ware without travel through the town centre. Both of these options were considered to have minimal impact on the character of the town. Development to the South East and East were the least favoured directions of growth due to traffic congestion and flood plain issues.

In respect of development density, medium density was favoured based on the Society's desire to maintain Ware as a pleasant place in which to live, work and take leisure. High density was not supported.

In terms of the suggested vision, The Society commented that it appeared to be aspirational and that continuous monitoring and development would be essential if the objectives were to be achieved.

Hertford Regional College's non site specific representations (i.e. those not relating to the further development of the College via the release of land in its ownership for residential development) related to the vision for the town and sought specific reference to further and adult education provision in this respect.

Other comments

In addition to representations received from specific consultation bodies, various responses were also received from individuals.

In respect of the future growth of the town, of the 382 overall respondents who expressed a preference regarding Question 36, the first choice rankings showed that over 48% supported growth in the town centre/existing urban area. The second most popular direction of growth was to the South West (60 people, 15.7%); closely followed by growth to the North (58 people, 15.1%). Easterly growth received 42 people's support (11%), while the least favourite option was growth to the South East with only 9.4% (36 people).

To elaborate on their preferences, some respondents added comments to support their view. Some of these representations put forward the view that either the town had already been overdeveloped, or that its infrastructure would be unable to cope with additional development. The point was made that Ware has doubled its size twice since the 1950s, and in particular, reference was made to services being overstretched, such as schools, doctors and sewerage connections.

GSK, the major employer in the town, stated that, whilst it had no particular view on which growth option should be pursued, it considered that wherever possible its staff should have the opportunity to live close to their place of work, which would in theory reduce their need to travel. The company therefore supported the growth of Ware and future residential development in and around Ware.

The Green Belt was seen as another constraint to development – both in avoiding coalescence with other settlements, most notably Hertford, and in protecting wildlife corridors and flood plains. However, a more radical suggestion was that innovative construction could enable the delivery of dwellings in the floodplain to the west of Ware via the utilisation of stilts or rafts that would float in flood conditions.

One view was that, if development needed to occur in the town, it should be based on the population forecasts for Ware only.

Several respondents advocated the use of brownfield land as a first option. Other opinions involved the need for development land to be near to existing services, schools, transport links, and to respect the historic layout, fabric and character of the town. Beyond housing, the need to provide amenities for people, especially teenagers, beyond sports facilities, was also identified. The 'Cow Fields' area between Wodson Park and High Oak road was also identified as being of specific amenity value for local residents for walking/dog walking and local events, and that this should be kept in relation to future housing development.

Traffic and congestion were seen as particular issues for the town and improvements to the existing infrastructure would be required to cater for increased traffic volumes.

The type of dwellings to be provided was also raised, with the number of flats provided in the town to date seen as a matter of concern and family housing being favoured for future provision to redress the balance and provide for a mixed community.

In respect of the density approach for any future development, there were mixed views presented. Of the 29 people who expressed a view in ranking Question 37, for their first preference just over 50% (15) opted for medium density, involving medium land-take. Only four people (14%) preferred higher density provision, while 10 (34%) were in favour of lower density developments.

Supplementary comments showed that, while some people considered that higher density should be adopted as this would involve the lowest land-take, others felt that there is currently an excess of high density development in the form of flats in Viaduct Road, Crane Mead, Star Street and other central areas and that more medium density housing is required for families. Further respondents put forward the view that it would not be possible or realistic to seek to define development densities on a town-wide basis and development should be consistent with the density of existing neighbouring residential areas to reflect local character.

In terms of Question 38, 93.9% (31 people) either agreed or partly agreed with the emerging Vision for Ware, with only two people (6.1%) disagreeing.

While many agreed or partly agreed with the emerging Vision, some of those who expressed further views beyond their stated preference considered that the contents were either too vague or unrealistic. A point made was that the Vision should follow PINS guidance in this respect. Others considered that the Vision could only be fulfilled if there was little or no growth in Ware as otherwise its character as 'an attractive town and pleasant place to live' would be altered.

Specific suggestions for amendment to the Vision involved the inevitability of Green Belt development and that it was misleading not to acknowledge this in the Vision, while for others the release of Green Belt land and infilling of green space was not supported. Again, the issue of the delivery of more flats altering the character of the town was highlighted. Another suggestion was that flood plain issues should also be included.

In respect of the prospect of a cinema or theatre being provided, one view was that the town is not large enough to support such a facility and that it would attract more cars to a congested town.

The emphasis on retaining Ware's function as a key employment base for the district was supported, but the tension between maintaining suitable

employment sites and the pressure to release sites for higher value purposes was raised. Another response suggested that the Vision should include provision for expanding existing key businesses in and around Ware. Also, that the Vision should reflect the current recognised shortfall in retail provision for Ware and provide guidance for existing major businesses outside the town centre.

Harlow

Harlow

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy. For example, some studies were commissioned during the final phases of preparation of the East of England Plan, and the scope of such studies was therefore constrained by Policy HA1 of the plan, which required at least 10,000 dwellings north of Harlow. Such studies did not test the sustainability of the principles of development north of Harlow but nevertheless do provide useful information when understood in terms of the scope of the commission.

The second part of this section sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

The documents in the first part of this section have been grouped as follows:

Town/Community Documents:

- Gilston Great Park – A Proposal for Actively Managed Countryside North of Harlow (STOP Harlow North, 2006)
- Hunsdon Parish Plan (2008)
- Sawbridgeworth Town Action Plan (2010)
- STOP Harlow North – Response to East Herts Council's Issues and Options consultation (2010)

East Herts Council Documents:

- Accommodation Needs of Gypsies and Travellers in Northern and Eastern Hertfordshire, Stage Two: Identification of Potential Areas to Accommodate Gypsy and Traveller Pitches in the Study Area (Scott Wilson, October 2007)
- Retail and Town Centres Study (Chase & Partners, 2008)
- Employment Land and Policy Review (Halcrow, 2008)
- Strategic Flood Risk Assessment (East Herts Council, 2008)
- Strategic Housing Market Assessment (ORS, 2010)
- Sustainability Appraisal Scoping Report (2010)
- Issues and Options Sustainability Appraisal (2010)
- Issues and Options Consultation Document (2010)
- Response to Harlow Council's Issues and Options Consultation Document (2010)
- East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)
- The Strategic Land Availability Assessment (East Herts Council, 2012)
- East Hertfordshire Population & Household Forecasts – Parish Groupings and Towns (Edge Analytics, May 2012)
- Bishop's Stortford and Sawbridgeworth Urban Transport Plan (forthcoming)

Harlow District Council Documents:

- Harlow Area Landscape and Environment Study (CBA, 2004)
- Harlow Area Green Infrastructure Plan (2005)
- Harlow Area Study (Matrix, 2005)
- Harlow Regeneration Strategy (2005)
- Harlow Area Investment and Renewal Framework (GVA Grimley, 2006)
- Harlow Employment Utilisation Study (GVA Grimley, 2009)
- Harlow Regeneration and Social Inclusion Strategy (Harlow Council, 2010)
- Harlow Infrastructure Study (Roger Tym, 2010)
- Core Strategy – Issues and Options Consultation (2010)
- Harlow Annual Monitoring Report (2011)

Joint documents:

These documents were prepared in the context of Policy HA1 of the East of England Plan:

- Stort Valley Feasibility Study (2007)
- Rye Meads Water Cycle Strategy (Hyder, 2009)
- Harlow Options Appraisal (Scott Wilson, 2010)

County/Regional Documents:

- Hertfordshire County Structure Plan – Development Strategy Consultation Document (Hertfordshire County Council, 1996)
- Stansted/M11 Corridor Development Options Study (Colin Buchanan, 2003)
- Sustainable Communities: Building for the Future (ODPM, 2004)

- RPG14 Strategy Review: London-Stansted-Cambridge-Peterborough Corridor (Robin Thompson Associates, 2004)
- Proposed Development North of Harlow: Potential Noise Impact of Aircraft Using London Stansted (Castella Stanger, 2006)
- East of England Plan – Report of the Panel (June 2006)
- East of England Plan – Secretary of State’s Decisions (December 2006)
- Regional Scale Settlement Study (Arup, 2009)
- Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)
- Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)
- Hertfordshire Strategic Green Infrastructure Plan (Land Use Consultants, 2011)

Other documents:

- A Sense of Place: Design Guidelines for development near high voltage power lines” (National Grid and David Lock Associates, 2004)
- Broxbourne Core Strategy - Inspectors Report (December 2011)

Town/Community Documents:

Gilston Great Park – A Proposal for Actively Managed Countryside North of Harlow (STOP Harlow North, 2006)

In summary, the proposal is for an extensive area of Green Infrastructure to the north of Harlow as an alternative to development. The proposal states that *“The area of Gilston Great Park includes the northern slopes of the Stort Valley and part of the East Herts plateau extending from Hunsdon in the west to Sawbridgeworth in the east. This totals some 25 sq.Km. The proposals for the area will complement those for the Stort Valley flood plain which in turn is being considered as an extension to the Lea Valley Regional Park. As such this will provide a continuous area of open countryside dedicated to conservation of the environment, open uses and leisure extending out of London. The proposals are also complementary to the measures being undertaken for the regeneration of Harlow. A high quality environment and countryside leisure facilities close to Harlow will be seen as an asset for all those who live and work in the Town and therefore a positive attraction to employers”.*

Hunsdon Parish Plan (2008)

One of the key issues identified by the plan is to: *Conserve the environment of the village and its surrounding countryside...particularly in the light of pressures from central government to build extensive housing on Green Belt north of Harlow, some within the Parish.”* [page 3]

The Parish Plan contains a number of policies/proposals including:

“To reject proposals to review the Green Belt to develop up to 25,000 houses north of Harlow. The community believes this to be unnecessary, unsustainable and to have been pursued by a totally undemocratic process.”

The Actions in support of this policy/proposal are:

Support for STOP Harlow North as follows:

1. *Parishioners individually physically and financially*
2. *PC to continue to mandate a representative on SHN*
3. *PC to continue funding support of SHN*

Further policies/proposals are included under the heading 'environment' as follows:

1. *To include the whole of the Parish, outside the present Village envelope, in an extended Green Belt north of Harlow. The boundary to be defined in relation to local housing needs.*
2. *To support and include the whole of the Parish, east of Widford Road and Stanstead Road as part of the Gilston Great Park proposal.*
3. *To give special emphasis to conservation and improvement to the historic parklands and woodland landscape in the southern part of the Parish as a green back-drop to the built-up area of Harlow.*
4. *To seek landscape improvements to the open areas in the northern part of the Parish, in particular to increase the area of woodland in accordance with EHC policy ENV10.*
5. *To support the Conservation Area policies for the centre of the Village as adopted by the District Council.*
6. *To establish a comprehensive record of all sites and features of historic, ecological or scenic value in the Parish in order to secure their protection and enhancement.*

Sawbridgeworth Town Action Plan (2010)

The Action Plan states *"The Parish Councils of Eastwick and Gilston, Hunsdon and Widford in their Parish Plans are incorporating the proposal of Gilston Great Park. This is a concept that is an alternative to 20,000 plus houses proposed on East Herts green belt land north of Harlow. There should be a united front between the Parish and Town Councils affected by the threat of this undemocratic and unsustainable build on our beautiful countryside. Therefore this Town Action Plan thoroughly endorses the Gilston Great Park proposal."* [Page 62]

STOP Harlow North – Response to East Herts Council's Issues and Options Consultation (2010)

This summary is based on the full document, which contains a large number of arguments that development north of Harlow should not be pursued as an option. The arguments include:

- *Unrealistic economic aspirations:* Job forecasts for Harlow are very low; it is unclear how large-scale development could address this. High vacancy rates in existing employment areas in Harlow. Need to focus on regeneration of Harlow rather than large-scale growth.
- *Damage to economic and social well being in East Herts:* Could undermine economic vitality of market towns. Would damage rural community life in surrounding villages.
- *Sustainability:* Harlow Options Appraisal Study suggested that 'Option C' would be the best option in the absence of the East of England Plan.

- *Infrastructure issues:* No prospect of upgrades to Harlow College; no consideration given to primary or secondary education. Other social infrastructure unfunded. Existing Herts infrastructure deficit of £2.4bn and no major public funding available.
- *Transport infrastructure:* Road and rail congestion, DfT arguments against new junction on M11. Question deliverability of M11 link-northern bypass. Need to address existing congestion in the town first.
- *Flood risk:* Surface run-off poses risk of flash floods.
- *Localism and the Big Society:* Under Localism East Herts Council must recognise the wishes of local people.
- *Urban form of Harlow:* Stort as a natural barrier to the town, as conceived by Frederick Gibberd.
- *Vested interests:* Powerful lobby - BP pension fund influenced outcome of East of England Plan. HNJV flyer promoting N Harlow as meeting all East Herts housing needs fails to understand basic planning principles.
- *Historic and Environmental Impact:* Impact on Hunsdon Meads SSSI, Scheduled Monuments north of Harlow and on European designated sites.
- *Stansted Airport:* Noise issue from overflying of area. No second runway so no additional demand.
- *Quality of life:* Impact on residents from surrounding area would be affected.
- *Landscape:* Assessed as 'improve and conserve'. Unspoiled, mixed use countryside.
- *Green Belt:* Including coalescence issues with Sawbridgeworth and villages. Urban sprawl. Firm Green Belt boundaries existing at present along the Stort. Breach of the Stort would result in a loss of control of development for generations to come.

The document also advocates the Gilston Great Park proposal for 'actively managed countryside' north of Harlow as an alternative to development, and reviews the planning history from the East of England Plan.

East Herts Council Documents:

Accommodation Needs of Gypsies and Travellers in Northern and Eastern Hertfordshire, Stage Two: Identification of Potential Areas to Accommodate Gypsy and Traveller Pitches in the Study Area (Scott Wilson, October 2007)

As part of the planning process, local authorities are required to make provision to accommodate additional Gypsy and Traveller pitches and plots for Travelling Showpeople in their development plans. In complying with this requirement, East Herts joined in partnership working with Broxbourne Borough, North Hertfordshire District, Stevenage Borough, Welwyn Hatfield Borough and Hertfordshire County Councils to undertake a two-stage Gypsy and Traveller Accommodation Assessment technical study in the Northern and Eastern Hertfordshire area.

Stage 1 of the study undertaken in 2006 considered the accommodation needs of Gypsy and Travellers in Northern and Eastern Hertfordshire and Stage 2 of the Accommodation Assessment was undertaken in 2007 and

sought to find suitable areas in which pitches could be provided to meet those Gypsy and Traveller accommodation needs. Within East Herts the study identified seven broad areas that could have potential to provide for the accommodation of Gypsy and Traveller sites, and these areas included locations in Hunsdon. In reaching these findings the study took account of issues such as distance from services, environmental designations and the Green Belt, as well as site specific criteria.

However, it is important to note that the Stage 2 Site Scoping report has been produced by independent consultants as a technical study and was completed some years ago. The recommendations in the report have not been endorsed by the Council at this stage. The locations identified in the Study are broad areas where the consultants recommended that the Council may wish to consider locating Gypsy and Traveller pitches. In making its decision as to the location of additional pitches the Council will take the Stage 2 Site Scoping report into account as one strand of the evidence base. It will also consider all other evidence available including: land availability, planning applications submitted in the interim, sustainability criteria, and the potential for large-scale development opportunities to aid delivery. It will also be important to ensure that any new sites have the potential for successful integration between traveller and settled communities.

Retail and Town Centres Study (Chase & Partners, 2008)

Harlow is often visited by residents of the Sawbridgeworth area for convenience shopping (67%), and comparison shopping trips from Sawbridgeworth, Ware and to a lesser extent from Bishop's Stortford.

Employment Land and Policy Review (Halcrow, 2008)

The following extracts are taken from the study:

Within the Stansted/Harlow sub-region (which includes part of East Herts) the RES [Regional Economic Strategy] aims to maximise the sub-region's potential to become an important regional centre for growth by maximising economic development opportunities afforded by its proximity to London, Stansted Airport and Cambridge. Realising these opportunities requires major new transport investment to improve access to employment sites, the M11 and Stansted Airport and regional east to west links. [Page 11]

The Office Property Market Overview states:

As already mentioned both Stevenage and Luton are key competing centres to those in East Herts, as is Harlow. All three are significant centres with the advantage of having better accessibility to London (e.g. better train services). Future inward investment, at present, is more likely to be attracted and retained in these key locations, in particular Stevenage and Luton, rather than the wider market area in which East Herts is located...Harlow achieves the lowest rental values, which is in line with the fact that it does not experience the same levels of demand expressed by its higher number of years supply. [pages 25-6]

The Industrial/Warehouse Property Market Overview states:

As with the office market the key competing industrial locations to East Herts are Stevenage, Luton and Harlow. Their better access to the motorway network and/or closer proximity to London, which is more of a priority for those businesses taking industrial/warehouse space, has meant they tend to enjoy higher levels of demand, particularly that from larger occupiers. This means that any future inward investment, at present, is more likely to be attracted and retained in these locations rather than to East Herts as a whole. Bishop's Stortford's position on the M11 means that it does present opportunities for further expansion particularly if the proposed Stansted Airport expansion was to take place. [Page 32]

Strategic Flood Risk Assessment (East Herts Council, 2008)

The River Stort flows along the northern edge of Harlow. There are a number of small tributaries which flow southwards across open countryside into the Stort. From west to east these are: Hunsdon Brook, Eastwick Brook, Fiddlers Brook, and Pole Hole Brook. Hydrological modelling has established the extent of Flood Zone 3 (High Risk), and Flood Zone 2 (Medium Risk), and Flood Zone 1 (Low Risk). There are extensive areas of Flood Zone 1 around the town, to the east, west and south. To the north an extensive area of Flood Zone 2 and 3 lies adjacent to the existing settlement along the Stort. Therefore development to the north would have to be accommodated in the area of Flood Zone 1 north of the river.

Strategic Housing Market Assessment (ORS, 2010)

Harlow is seen as having strong linkages with Bishop's Stortford and Sawbridgeworth. Harlow is relatively self-contained, providing many jobs as well as housing. In this it is similar to Cambridge, Luton, Chelmsford, Hemel Hempstead and Watford. Net migration from Harlow to East Herts between 2002 and 2007 exceeded 1,000 people. Harlow is unique in the sub-region in that it lost population through migration in both the 0-15 years and 25-44 years age group. Therefore, it is the only area which appears to be losing families⁴⁰. Harlow had more people on its waiting list in 2007 (17.8%) than any other authority, compared with 4.9% in East Herts⁴¹. 12.8% of households in Harlow are overcrowded, compared with 5.5% on average for the sub-region⁴². In 1981, social rent accounted for 75% of households in Harlow, but this is now down to around 30%, and expected to drop to 25% by 2021. This compares with current levels of around 11% in East Herts⁴³. Harlow is the only one of the six districts within the study where the median annual earnings of residents (£24,829) was lower in 2007 than those of people working in the area (£31,796). This is the inverse of East Herts District (£29,584 for residents of the district, compared with £25,158 for those whose workplace is in the district), which the study suggests may be attributable partly to the rural areas, which is attributable to people commuting from the countryside to well-paid jobs elsewhere.

Sustainability Appraisal Scoping Report (2010)

⁴⁰ Page 82

⁴¹ Page 89

⁴² Page 99

⁴³ Page 118

Explanation of the Council's approach to sustainability appraisal is explained in Section 1.12 of this Supporting Document. The views of a number of consultees on a draft of the Scoping Report were sought, including Eastwick & Gilston, Hunsdon, Widford Parish Councils, STOP Harlow North, and Sawbridgeworth Town Council

The Scoping Report established a Sustainability Appraisal Framework including spatial areas and nine assessment topics. Six 'Spatial Areas' were identified as a planning tool to facilitate consideration of the strategic planning functions of different parts of the district. Broadly, these were based on Housing Market Areas plus consideration of additional functional relationships. The 'North of Harlow' spatial area was introduced in response to the requirements of the East of England Plan policy HA1.

The Scoping Report comments on what is likely to happen if a District Plan is not produced. Without the plan an appropriate planning framework would not be in place to deliver the required levels of housing within this area or to maximise the development opportunities which the scale of potential development may present with regard to elements such as green infrastructure. Additionally, without the plan it may not be possible to provide critical infrastructure such as sewerage, transport and water supplies. Large scale development within North of Harlow that is not guided by an appropriate policy context may have greater negative effects on the character of existing settlements including their historic features, agricultural land, biodiversity and metropolitan green belt. The Scoping Report also addressed a number of assessment topics. Many of the issues apply district-wide and have already been addressed in Chapter 2 of the Supporting Document.

Issues and Options Sustainability Appraisal (2010)

Sustainability Appraisal of the Issues and Options Consultation document was undertaken using the SA Framework established by the SA Scoping Report (see above). The Issues and Options document was a discussion paper and therefore did not propose any development options. Therefore the appraisal was inevitably high-level. In relation to the spatial areas contained in the SA Scoping Report, relevant comments are as follows:

- **Hertford-Ware Area:** 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:** 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....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:** 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:** 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.

Suggested mitigation measures included:

- 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
- 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
- Development should allow for easy access to existing rail stations in Harlow and facilitate an integrated bus service
- There is very little in terms of mitigating the negative effects of this option on the rural area or landscape character that can be recommended
- Strong policies are required to minimise water use and maximise water efficiency
- Waste-to-energy opportunities could be explored
- Strong safeguarding policies regarding impacts on Conservation Areas and Scheduled Ancient Monuments will be required
- Coalescence between development to the north of Harlow and existing settlements should be avoided where possible
- 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 Code for Sustainable Homes standards for residential and commercial development should be applied to the new development
- Opportunities to maximise renewable and decentralised energy production should be incorporated within the development
- Development should not occur within the Stort Valley Key Biodiversity Area unless supported by a particularly strong argument for it
- 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
- A Green Belt review should be undertaken prior to any development

Response to Harlow Council's Issues and Options Consultation Document (2011)

Non-Key decision 11/03 stated:

“That in respect of the Harlow Council Core Strategy Issues and Options Consultation Document, November 2010, Harlow Council be advised that East Herts Council:

- (i) maintains its total opposition to any development north of Harlow, in East Hertfordshire District, for the growth of Harlow, as contained in the East of England Plan 2008;*
- (ii) considers it premature to base the Harlow Core Strategy on the provisions of the recently re-instated East of England Plan 2008, in the light of the Government's intention to abolish Regional Spatial Strategies, and reform of the planning system embracing the localism agenda;*
- (iii) considers that given the assumptions underlying the top-down direction under which much of the existing evidence base was prepared, it is now necessary to re-examine the case for growth north of Harlow from the bottom-up.*
- (iv) submits the response contained at Essential Reference Papers 'B' and 'C' to this report.*

The covering report states that:

“The basic argument of the proposed response at ERPs 'B' and 'C' is that, since the scope of much of the evidence base for the expansion of Harlow into East Herts was limited by the top-down policy direction of the now moribund East of England Plan, it is essential for Harlow Council to address the limitations of this evidence from the bottom-up, in order to be able to develop a plan which will be fit for the new planning system under the Localism agenda. It is therefore argued that it is premature for Harlow Council to express a preference for urban extensions into East Herts district north of Harlow.”

East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

“Project 2 – Stort Valley and Countryside Links” includes the area north of Harlow. The main features of this proposal are:

- Recognising and valuing the rural landscapes in and around the Stort Valley and encouraging sustainable management of aspects of the habitat mosaic e.g. grassland and ancient woodland plus enhanced woodland and wet woodland linkage
- Enhanced pedestrian access and habitat links from the Stort Valley and Harlow to local GI sites of interest (Rivers Nursery Site, Lee Valley and river network) plus wider farmland landscape
- Selective landscape management which enhances legibility and permeability (balanced with nature conservation interests) and improved signage/interpretation which could extend to links from Hertford and Ware to Harlow and Sawbridgeworth (and outlying rural villages e.g. Gilston)
- Reinforcement of the green back drop to Harlow and Sawbridgeworth, where conserving Gilston Park's woodland and Pishiobury Park could enhance the rural character of the area
- Creation of a series of local walking links to nearby towns which could include a sculpture trail to recognise the rich cultural heritage of the area, e.g. connections between Henry Moore at Perry Green and 'parallel' modernist landscapes of Harlow New Town

See also Hertfordshire Strategic Green Infrastructure Plan in the County/Regional documents section.

Strategic Land Availability Assessment (East Herts Council, 2012)

The land north of Harlow has been registered through the Call for Sites exercise (SLAA Stage 1). Stage 2 of the SLAA assessed sites within the built-up area of existing settlements. Other sites will be assessed first through the strategy selection process.

Bishop's Stortford and Sawbridgeworth Urban Transport Plan (forthcoming)

Work on this document will be progressed once the draft strategy for East Herts is available, in order that the impact of future development may be factored in to the plan. Work on the document will be lead by Steer Davies Gleave, commissioned by Hertfordshire County Council with East Herts Council as a key partner.

Harlow District Council Documents:

Harlow Area Landscape and Environment Study (CBA, 2004)

The study is divided into three volumes. The first volume includes a sensitivity analysis of the landscape and environment of 31 Landscape Character Areas around Harlow. This concludes that the Hunsdon Plateau (Character Area 11) and Stanstead and Pishiobury Parklands (Character Area 10) are 'highly sensitive' to very large scale development. Areas 18 and 20b to the east of Harlow were considered to have low sensitivity to very large scale development. Volume 2 of the study is a 'fringe analysis' of Harlow, which emphasizes the contribution of the countryside north of Harlow to the setting of the town. Volume 3 makes suggestions as to how, if required, development could be made more sensitive to the existing landscape and environment.

The study suggests the *"Desirability of retaining the rural character of largely undeveloped/open countryside to the north of the Stort Valley, and avoiding*

an increased sense of urbanisation through erosion of individual identity of rural settlements and their dispersed pattern within the landscape.”⁴⁴ The study also draws attention to a need to “avoid intrusive development on the visually prominent open ridges and slopes around High Wych that are important as the countryside backdrop to the setting of Harlow”⁴⁵ The study also suggests that key conservation and enhancement opportunities include the “undeveloped, hidden and ‘Green’ character of Stort Valley maintained by avoiding development within the floodplain.”⁴⁶

Harlow Area Green Infrastructure Plan (2005)⁴⁷

This study sets out a strategic vision for planning new and enhanced Green spaces and routes for an area centred on Harlow and stretching from Bishop’s Stortford and Hatfield Forest in the north and east to Epping Forest and the Lee Valley Regional Park in the south and west with the Rivers Lee and Stort and their valleys forming the connecting link between these main cornerstones. A delivery plan for particular projects in the Green Infrastructure Plan, focusing on the existing built-up area and the Stort Valley, was published in 2010.

The Harlow Area Study (Matrix, 2005)

This study suggests design principles for the growth of Harlow. The study notes that Sir Frederick Gibberd, the original designer of the New Town, intended “*the railway line, river and new road as the ‘baseline for the town’ – with the Hertfordshire Hills free of building to the north*” but continues “*Gibberd’s baseline suggests a restriction on development north of the Stort. Current best practice, however, seeks to maximise highly accessible locations and Regional growth pressures will call into question Harlow’s existing settlement boundary*”.⁴⁸ The study suggests that in light of this Gibberd’s limit on growth to the north has become ‘*dysfunctional over time*’⁴⁹.

Harlow Regeneration Strategy (2005)

The document is the basis for the argument that growth to the north of Harlow would assist in the regeneration of the town.

Chapter 2 examines the underlying issues and key challenges, including an underperforming economy, a small labour market (only 75,000 population) with low skills, with many of the high-end jobs taken by in-commuters rather than Harlow residents. The town is characterised by poor physical infrastructure and an ageing housing stock, poor accessibility and traffic circulation to the north of the town, and a negative image as a place to live or do business.

⁴⁴ Harlow Area Landscape and Environment Study (2005), Volume 2 page 10

⁴⁵ Volume 2, Paragraph 2.6.4

⁴⁶ Volume 2, Page 10

⁴⁷ www.harlow.gov.uk/gip

⁴⁸ Page 13, Paragraph 3.2.3

⁴⁹ Page 11

Chapter 3 suggests that substantial growth in the scale of the town would lead to agglomeration benefits⁵⁰. “*Growth will give Harlow the potential to re-establish its position in the regional hierarchy*”. Given the scale of the challenges facing Harlow, large-scale growth is the only way to draw in sufficient investment in new infrastructure. The LSCP growth corridor therefore represents an opportunity for Harlow.

Chapter 4 suggests six regeneration needs for Harlow:

- A dynamic economic base
- A skilled and innovative workforce
- A ‘Step Change’ in the physical environment
- Social Inclusion for all
- The re-branding of Harlow
- Creating Critical Mass for Investment

The study states that “*incremental approaches to the individual regeneration needs will only achieve marginal change and will not move Harlow from its current position of investment deficit and underperformance*”

Chapter 5 examines the link between regeneration and growth. It examines three different scenarios, and undertakes a cost-benefit analysis of each. Conclusions are presented as follows:

- **Low growth or ‘continuation of existing trends’ (8,000 new dwellings, 4,000 new jobs):** is clearly not an option in terms of its ability to address regeneration needs in Harlow. This scenario is likely to further undermine the position of the town relative to the high levels of growth anticipated in neighbouring economies. Current economic and infrastructure constraints would continue to inhibit the town and no fundamental change would occur to Harlow’s situation.
- **A sub-regional focus or ‘broadening horizons’ (14,000 new dwellings, 11,000 new jobs):** would see significant regeneration occurring and the maintenance of the town’s economic position relative to competing areas. Regeneration would be focused towards improving the economy and labour market through continuation/enhancement of existing regeneration activities, coupled with strategic investment in housing, transport and the town centre. However, the capacity created would be insufficient to attract the scale of investment necessary to address current deficits and future needs.
- **A regional focus or ‘dynamic transformation’ (20,000 additional dwellings, 16,000 new jobs):** has the potential to provide the scale of change needed to satisfy the regeneration needs of the town. This scenario has the critical mass required to enact change, deliver flagship projects, and fundamentally change the town through high and rapid growth that attracts necessary and immediate investment.

⁵⁰ A separate study by PACEC compares 24 separate settlements to compare these.

The following features are suggested as part of the preferred strategy of dynamic transformation:

- New sub-regional shopping centre
- Top-quality business park
- R&D related higher education facility
- Airport services cluster

In conclusion, *“The analysis is clear: continuation of existing economic performance will reinforce the relative decline of Harlow and current levels of public intervention are effectively ‘fire-fighting’. While making valuable contributions to the social economy of Harlow, existing funding is insufficient to tackle the levels of economic and social deficit highlighted in the strategy”⁵¹*. The remainder of the strategy works through a number of proposed regeneration initiatives based on this premise. The study concludes that *“given the level of investment required regeneration is inextricably linked to the growth of Harlow, in so much that critical mass is required to generate investment from the public and private sector.”⁵²*

Harlow Area Investment and Renewal Framework (GVA Grimley, 2006)

This identifies specific actions at a limited number of existing locations within the town, in particular at the ‘northern corridor’ between the Town Park and Old Harlow, focussing on Temple Fields Employment Area and River Way. It mentions four strategic issues forming the context for the framework: New Hall (2,000 dwellings potential); Gilden Way (proposals for up to 1,000 dwellings); Harlow Gateway Scheme (leisure, retail and commercial scheme between the Town Centre and Harlow Town station, including 530 residential units); north-east connection to the M11 from the A414. However, the study does not otherwise explore long-term strategic planning issues.

Employment Utilisation Study (GVA Grimley, 2009)

The main focus of this study is the performance of the existing employment areas within Harlow. In respect of growth to the north in East Herts, the study states that any employment in this area would require significant infrastructure provision in order to overcome the constraints of the Stort floodplain, and that any opportunities in this location should be considered long-term.

Harlow Regeneration and Social Inclusion Strategy 2010-2015 (Harlow Council, 2010)

The strategy sets out 7 ‘priorities outcomes, but it does not address the issue of growth to the north of Harlow specifically, nor does it provide details of specific regeneration schemes within the existing town. It does state that *“Harlow Council and its partners believe that the growth envisaged by the EEP (East of England Plan) and the RES (Regional Economic Strategy) must be supported by the necessary investment in infrastructure and linkages between organisational strategies and investment to ensure that a whole–town, single community, approach delivers the regeneration and community benefits identified by this strategy.”* (Paragraph 18)

⁵¹ See page 27 of the strategy.

⁵² See Concluding Statement, Page 45.

Harlow Infrastructure Study (Roger Tym, 2010)

This study tested the pattern of development recommended by the Harlow Options Appraisal, based on RSS requirements and including development to the north, south, east and west, and within Harlow itself. The study sets out the main items of infrastructure required to enable the growth of Harlow, together with a broad estimate of infrastructure costs and funding sources split between 'mainstream funding' and 'developer funding'. It split the needs and costs into two phases, from 2011 to 2021 and from 2021 to 2031, and also mapped some proposed transport and highways infrastructure schemes including a 'northern spine road' to connect development north of Harlow with the M11. The study also suggests that governance arrangements involving two district and two county councils would need to be given careful consideration.

The Consultants consider that the 800dpa that would be required at North Harlow (in East Hertfordshire) between 2021/22 and 2030/31 is not deliverable for three reasons:

- The maximum levels of delivery that have ever been promoted, even in buoyant economic times, are only 600dpa. This was at Swindon Northern Expansion Area; more recently the South Cambridgeshire Core Strategy Inspector accepted a similar delivery rate for Northstowe, but partly because of the involvement of English Partnerships (now part of the Homes and Communities Agency);
- Other sites making up the Harlow growth area will be developed at the same time, thus further diluting the potential to deliver high rates at Harlow North. There simply would not be the capacity within the construction industry in the region, particularly given the strong growth that is expected in so many other locations;
- The 8,000 dwellings figure comes from the current Ropemaker scheme. Even if they could theoretically deliver 800dpa, private developers are only keen to complete a certain number of units per week so that they do not flood the market and possibly dilute their returns.

The need, therefore, is to inject a more realistic approach into the delivery of growth in Harlow, post-2021, which the trajectory does. This means delivering a lower number of dwellings in East Hertfordshire between 2021/22 and 2030/31. If all of the Harlow growth in that period were included, then the total number of dwellings expected to be delivered would be 14,600 (8,000 at Harlow North and 6,600 elsewhere in the District). Using the Hertfordshire-wide trajectory, that is reduced from to 8,200 dwellings (broadly 4,200 at Harlow North and 4,000 in the rest of East Hertfordshire). This is still challenging, but would not be setting a precedent nationally. It would also not call into question the deliverability of any scheme at Harlow North - it would

simply be suggesting that the timescale would need to be lengthened beyond 2031.

Core Strategy Issues and Options Consultation Document (2010)

The following extract is taken from the consultation document:

The Council believes that there is a need for a significant increase in homes and jobs to support regeneration. Growth led regeneration will enable the town to generate the critical mass needed to attract and sustain investment ensuring Harlow secures its role as a key subregional centre. A substantial increase in growth will sustain a dynamic and vibrant town, will sustain a higher level of retail provision, will provide greater employment opportunities and cultural functions as well as supporting higher level services and facilities in health and further education....Current research highlights that for Harlow to fulfil this role and to successfully secure the regeneration and renewal of the town an increase in economic and demographic growth and hence employment and housing growth is necessary. [Page 28]

The evidence supporting the now withdrawn East of England Plan considered that the provision of 16,000 new homes and approximately 8,000 jobs in the Harlow area would help address the underlying issues affecting Harlow by stimulating the regeneration and renewal of the town. The Council believes that this level of growth would not only meet the needs of the existing community but help address a number of the other complex issues affecting the long term prosperity of Harlow.

The Council recognises that growth is not an end in itself and needs to be linked to a range of initiatives to address economic stagnation and current social issues. However, growth can provide the much needed stimulus to propel the regeneration and renewal of Harlow. By taking this opportunity to be bold and transformational the Council and the community can recreate the spirit on which the town was founded...The Council also recognises that delivering growth and regeneration will be challenging. This will need to be delivered in a phased and coordinated way to ensure the appropriate and timely delivery of a range of infrastructure necessary to support growth. [Page 29]

Harlow Annual Monitoring Report (2011)

The Annual Monitoring Report includes a Housing Trajectory, which shows how Harlow Council plans to meet NPPF requirement to demonstrate a five-year housing land supply. A simplified version of Harlow Council's AMR is shown in the table below.

Location	Status	Total residual	Total identified supply to 2025	Phasing Notes
Harlow Gateway – 423 completed	Extant permission	130	130	Complete 2013/14
New Hall Phase - 433 completed	Extant permission	188	188	Complete 2014/15
Faircroft etc	Extant permission	43	43	Complete by 2013/14
1 & 1a Walfords Close	Extant permission	12	12	Complete by 2013/14
Rank House	Extant permission	132	132	Complete current year
Lutheran Church, Tawneys Rd	Extant permission	14	14	2012/13
Prentice Place	Extant permission	63	63	2012/13
Clifton Hatch	Extant permission	28	28	2012/13
Carters Mead Playground Site, Southern Way	Extant permission	27	27	2012/13
Small sites under 10 dwellings	Extant permission	128	128	15 per year to 2019
New Hall Phase 2	Allocated site	750	600	Start 2013/14 - 50 per year
Ram Gorse	Allocated site	110	110	2015-2018
Swimming Pool Site	Allocated site	65	65	Complete by 2013
Northbrooks Regeneration Area	Allocated site	52	52	2017-19
Sherards House	Allocated site	10	10	2017
Wych Elm	Allocated site	110	110	2017-19
New Hall Phase 3	Allocated site	1,500	450	Start 2016/17 - 50 per year
Land adjoining Downs Primary School	Informally identified	25	25	2015/16
Town centre North Market Square	Informally identified	500	500	2019-2022
Broadwalk Apartments	Informally identified	41	0	Beyond 2025
Land North of Gilden Way	Informally identified	1,000	1,000	2014-2019
Aldi Store First Avenue	Informally identified	14	14	2017/18
Barley Croft etc	Informally identified	200	200	2015-2017
Staple Tye	Informally identified	40	40	2015/16
East Harlow	Contingent	2,000	1,000	Start 2020 - 200 per year
Total		7,182	4,941	

Source: Harlow AMR 2010 to 2011

Greater Essex Demographic Forecasts: Phase 2: Scenario Development, incorporating Phase 1: Model Development (2012)

The projections are based on nine different scenarios. The top end of the range of scenarios suggests that Harlow Council will need to provide for 427 dwellings per annum and 361 jobs. The lowest end of the range of scenarios suggests that Harlow Council will need to provide for 162 dwellings per annum and only 10 jobs. Page 33 of the study includes the projections for Harlow to 2033 as follows:

Scenario	Household Change		Average Dwellings Per Year	20 Year Total
	2010 - 2033 No.	%		
Harlow District				
Sub-National Population Projections 2010 Nil-Net Migration	6,348	18.1	281	5,620
Migration-Led	6,196	17.8	274	5,480
	9,641	27.6	427	8,540

For further explanation please refer to the full study.

Joint documents:

Stort Valley Feasibility Study (2007)

Further to the Harlow Green Infrastructure Plan, the purpose of the study is to draw together existing data, consider the priorities and activities of the key stakeholders and recommend future actions and how these can be achieved. The study puts forward a vision to protect the integrity of the Stort Valley, whilst optimising the multifunctional landscape of the area.

Rye Meads Water Cycle Strategy (Hyder, 2009)

This study was prepared in response to the requirements of the RSS, which identified capacity constraints at Rye Meads arising from proposed growth, particularly at Stevenage and Harlow. Further information on the Rye Meads issue is provided in Section 2.6: Water of the Supporting Document. The key issues in respect of Harlow infrastructure are as follows:

“The new eastern outfall sewer (Phase 1) is likely to primarily be a tunnel and will run from the Newhall Farm development site, across Gilden Way, along Priory Avenue then along Edinburgh Way to the River Way junction. At this point a temporary pumping station will lift the flows across to the existing trunk sewer. The temporary pumping station will regulate the flows into the existing trunk sewer and the oversized pipelines will operate as storage tanks to balance flows. The extension to the eastern outfall sewer (Phase 2) will run along Edinburgh Way and then follow a line parallel to (and to the south of) the railway line to Roydon. It will then cross the railway and River Stort to connect to Rye Meads WwTW. Once this sewer extension has been built the temporary pumping station will be abandoned and the existing branch outfall sewers will be connected to the new sewer. This will free up capacity in the existing trunk sewer for any development areas to the north of Harlow....The

upgrade (and duplication) to the trunk sewer parallel to the Stort has the potential to impact upon Hunsdon Mead [SSSI] unless carefully managed.

The poor quality of urban and agricultural runoff into the River Stort is already known to be causing the northern unit of the site to be in an unfavourable condition. Opportunities to include some form of surface water attenuation and treatment, such as an integrated wetland area, in conjunction with the proposed works should be investigated by TWU [Thames Water Utilities] and HDC [Harlow District Council] in partnership with the EA [Environment Agency] and Natural England.⁵³

Harlow Options Appraisal (Scott Wilson, 2010)

This study includes detailed consideration of the implications of outwards growth of Harlow in each direction at different levels. The study used a criteria-based approach to assessment of 32 separate areas around the town, and acknowledging that the town is surrounded by Green Belt on all sides. The Harlow Options Appraisal was commissioned jointly by Harlow, East Herts, and Epping Forest Councils in order to comply with the East of England Plan. However, the document contains useful evidence which can be used to inform developing options within the context of the NPPF, provided that care is taken to separate findings which were determined by the East of England Plan from findings which can be verified independently.

The study was developed in accordance with the requirements of Policy HA1 of the Regional Spatial Strategy (RSS - East of England Plan), including growth north of Harlow. Each of the five test options was derived from requirement of Policy HA1 for 16,000 dwellings in the Harlow area, with 10,000 to the north⁵⁴.

In reaching their conclusions in respect of the preferred spatial approach above, the consultations tested six different scenarios or options, which enabled consideration of a wide range of issues at different directions and levels of growth in each direction around the town. The consultants concluded that a constraints-led approach, based on Green Belt, flood risk or landscape sensitivity, does not offer directional guidance. The study then tested the options for the sustainability and reasonableness. In summary, this produced the following conclusions:

North

Reasonableness Test conclusions:

- Conforms to RSS Policy HA1 at higher levels of growth
- Significant landscape impact, but opportunities for networks of Green Infrastructure
- Potential for critical mass to catalyse existing renewal projects within Harlow

⁵³ Pages 114-115

⁵⁴ Harlow Options Appraisal (March 2010) Paragraph 3.4.3

- Dependent of higher levels of northern growth on the provision of new regional and national road infrastructure (Option D)
- Outfall sewer phase 1 will provide some capacity (2,000 dwellings) and development to the east while outfall Sewer phase 2 will provide capacity for longer term growth
- Possible capacity issues at Rye Meads Sewage Treatment Works if large-scale development also occurs at Stevenage and at Welwyn Garden City
- Large scale growth should be of a sufficient scale to facilitate large investments in new road and public transport infrastructure thereby encouraging a modal shift away from private car use, particularly given proximity to the train stations
- Risk that option might not be fully implemented in the plan period due to time required to put in place the necessary transport infrastructure and then develop – suggest 2,000 to 3,000 dwellings to 2021, with the remainder thereafter

The study shows that the most deprived parts of Harlow are located in the centre and south of the town. Therefore, any regeneration-based arguments for growth to the north are based on critical mass arguments as outlined above.

Sustainability Test Conclusions:

- Opportunities to link development to existing industrial areas north of Harlow
- Potential for support of a modal shift towards more sustainable travel
- Negative effects on some farming and agricultural activities
- Negative effect on SAMS, listed building, Registered Parks and Gardens and Conservation areas
- Unavoidable impact on sensitive landscapes
- Risk of coalescence with Sawbridgeworth
- Increased congestion and the need for new transport infrastructure such as a northern spine road and a new motorway junction northeast of Harlow
- Increased air pollution in different locations across the area.

South

Reasonableness Test Conclusions

- Does not conform to RSS Policy HA1 without northern growth
- Breach of the southern ridgeline
- Could readily incorporate landscape principles e.g. green wedges, upon which Gibberd designed the new town
- Possible requirement for a southern bypass (not yet costed) would only be financially viable at much higher levels of development

- Capacity constraints at Southern Way at lower levels of development
- Inability of this area to cope with significant amounts of new housing

Sustainability Test Conclusions:

- Negative effects on designated wildlife sites and including Harlow Woods SSSI and Local Nature Reserves to the south of Harlow
- Negative effects on SAMS, listed buildings, Registered Parks and Gardens and Conservation Areas
- Significant impact on the landscape south of Harlow

East

Reasonableness Test Conclusions

- Does not conform to RSS Policy HA1 without northern growth
- May not deliver sufficient levels of critical mass to catalyse existing neighbourhood renewal projects
- Could readily incorporate landscape principles e.g. green wedges, upon which Gibberd designed the new town
- Localised road improvements
- The draft HIS notes that facilitating large amounts of development to the east has the potential for being financially uneconomical as it is likely that a tunnelled sewer would be required from the development site to the trunk sewer (although developers to the east do not view this as a fundamental constraint)
- Low landscape impact
- Pressure on M11 Junction 7
- Reliance on car use
- Distant from railway stations

Sustainability Test Conclusions:

- Negative effects on designated wildlife sites
- Threats to conservation areas within Harlow East Herts District Council Increased congestion and need for new infrastructure such as access roads to/from eastern area developments and a new motorway junction northeast of Harlow

West

- Does not conform to RSS
- Coalescence with Roydon
- Proximity to Stort Valley maximizes Green Infrastructure opportunities
- Very limited capacity within sewers to the west, and while local improvements along Water Lane are practicable, elsewhere they are not. The upshot is that lower amounts of housing are suggested for any western extension.

Sustainability Test Conclusions:

- Opportunity to link development to industrial areas west of Harlow (i.e. Pinnacles)

Unsurprisingly given the policy direction set by the East of England Plan, the study concluded that 10,000 dwellings should be built north of Harlow by 2031. In reaching this conclusion, the study dismissed a 'combined criteria-led' option which *'performed best against the assessment criteria'*⁵⁵. This option located development to the east and avoided the north. However, this option was dismissed as *'not reasonable, primarily because it does not conform to the RSS'*⁵⁶. However, in the absence of the RSS, the consultants did emphasize that this is a genuine options:

All options have been generated with the intention that they form genuine options and have not simply been added to 'make up the numbers'. For example, while 'Spatial Option C – Criteria led' may not be strictly in line with Policy HA1 we feel that the robust evidence base and methodology that has informed this work suggests that it should be treated as genuine. [Page 54]

County/Regional Documents:

Hertfordshire County Structure Plan – Development Strategy Consultation Document (Hertfordshire County Council, 1996)

This document sets out the rationale for the development strategy within the former Structure Plan. Developments of less than 500 dwellings would not normally require identification at a strategic level in the Structure Plan (Page 11).

Firstly, the 'least suitable' areas for development are excluded as follows:

- Chilterns Area of Outstanding Natural Beauty
- South Hertfordshire (a broad largely south of the A414 as far as the A10). Over-congested, poor east-west passenger transport links, important function of Green Belt in avoiding coalescence.
- Other rural areas: no rail access, small and remote from main urban settlements.

Secondly, 'less suitable' areas include the Stort Corridor, including the towns of Harlow (in Essex), Sawbridgeworth and Bishop's Stortford. This corridor is already experiencing major housing development in both Hertfordshire and Essex, mainly related to Stansted Airport. Sufficient housing land has already been allocated to meet the needs of employment growth associated with the airport's permitted capacity. That being the case...meeting local housing needs provides a strong rationale for steering additional development away from this corridor in the extreme east of the county to towns in western and central areas [i.e. Watford/Hemel Hempstead/ A1(M) Corridor]....development locations along the Stort Valley which would exacerbate road congestion in

⁵⁵ Harlow Options Appraisal (March 2010) Paragraph 3.4.9

⁵⁶ Harlow Options Appraisal (March 2010) Paragraph 4.6.2 Option C (Figure 24).

the towns, particularly in view of the uncertainty about if and when an M11 link road will be constructed. [Page 25]

Stansted/M11 Corridor Development Options Study (Colin Buchanan, 2003)

The study establishes a development framework which can be adjusted to different development options for Stansted Airport, including options with and without a second, third or fourth runway. The study states that *“there is no way of avoiding environmental impacts – it is rather a question of minimising them or trading them off against other objectives.”*⁵⁷ The principal characteristics of the development framework are:

- The expansion of Harlow (extensions to the south, west and east only)
- The development of settlements along transport corridors.
- The need to introduce high capacity public transport along the growth corridors (the A120 and M11).
- The supportive role of major settlements (Cambridge, Colchester and Chemsford) which are on the edge of the study area, which are expected to continue to experience growth.

The study proposes two rapid transit busway routes: Route 1 between Epping (Central Line) and Stansted in a north-south direction along the A1184 through Harlow and Sawbridgeworth, and Route 2 operating between Braintree and Bishop’s Stortford in an east-west direction. Route 1 was estimated at £18m assuming 2km of guided busway, 10km of bus lanes and bus priority measures, a new bridge over the M11 and 12 new articulated buses to operate at least a 10 minute frequency. A proposed 5,000 space satellite airport car park at North Weald to help relieve pressure on airport approach roads is costed at £5m. A guided busway running along between a 5,000 space car park at Braintree and Stansted airport is proposed to alleviate congestion on the A120. Route 2 is estimated at £30 million included 10km of guided busway along a disused railway line between Braintree and Bishop’s Stortford⁵⁸. The study also proposed a Personal Rapid Transport (PRT) system to serve the existing Harlow settlement area and extensions to the south, east and west of the town. According to the study a PRT system such as ULTRA is likely to be self-funding and attract significant developer contributions providing that there is some initial pump-priming from the public sector⁵⁹.

Sustainable Communities: Building for the Future (ODMP, 2004)

This document explained the previous government’s regional planning agenda and guided subsequent work on the East of England Plan. Chapter 5: Sustainable Growth explains that the challenge is *“to accommodate the economic success of London and the wider South East and ensure that the internal competitiveness of the region is sustained, for the benefit of the region and the whole country. To alleviate pressures on services and housing caused by economic success where these pressures cannot readily be dealt with within existing towns and cities. Where new and expanded communities*

⁵⁷ Page 58

⁵⁸ Pages 97-98

⁵⁹ Page 89 and Figure 5.7

are needed, to ensure that these are sustainable, well-designed, high quality and attractive places in which people will want to live and work.”

The document identifies four growth areas: Thames Gateway, Milton Keynes/South Midlands, Ashford, and London – Stansted – Cambridge. In relation to this latter area, the study identified growth over the past decade, *“underpinned by clusters of some of the UK’s most successful businesses in Biotechnology, life sciences and ICT/software; and a rapid increase in the use of Stansted airport. The issue is not whether growth will continue, but at what level and how that growth is handled”*. The study requires “significant improvements to transport infrastructure – on the M11, around Harlow, and – in the longer term – better rail connections east-west to London.

RPG14 Strategy Review: London-Stansted-Cambridge-Peterborough Corridor (Robin Thompson Associates, 2004)

This study reviews earlier studies for growth in the Harlow area, and is also known as the ‘study of studies’. It suggests that whilst Peterborough and Cambridge are clear growth centres, *“a main spatial planning objective should be to develop a more coherent spatial structure in the southern sub-region [i.e. between the A1(M) and M11]... RPG must consider the longer-term needs of the Area. It is probable that land supply will be diminishing quickly by 2021. Much of the urban capacity will have been identified and taken up. Regeneration will hopefully have achieved its main targets. Urban extensions will be increasingly difficult to justify as pressures on towns accumulates. Small new settlements could make a contribution, but this would be nowhere near the scale of development needed as the area continues to grow”*⁶⁰ The study does not recommend ‘beads on a string’ along the A120 because it would distract from the focus on Harlow. It recognizes that growth of Harlow presents significant challenges in relation to the environment and infrastructure, but suggests that given the shortage of brownfield land the options are limited.

Proposed Development North of Harlow: Potential Noise Impact of Aircraft Using London Stansted (Castella Stanger, 2006)

This study was commissioned by Hertfordshire County Council in partnership with East Herts Council and Essex County Council. The study concluded as follows:

“This study has considered the aircraft noise impact on a proposed housing development area to the north of Harlow. It has been shown that in terms of the forecast average noise impact, the site does not fall within a noise exposure category where planning permission for housing would necessarily be refused outright under PPG24.

“A noise issue does however arise when worst mode operations (i.e. when the area is over flown) are considered. This issue applies with Stansted operating either as a one or two runway airport. If any housing development were

⁶⁰ Executive Summary, Paragraph 17.

permitted in the area, it would require specific noise insulation treatment to be included in the design including treatment to windows, alternative ventilation and possibly specific acoustic roof insulation.

“Despite the recent publication of BAA’s Generation 2 consultation document the impact on the site of a two runway airport remains uncertain. BAA’s preferred option (a) of a wide spaced second runway operating in mixed mode is, save for some uncertainty surrounding the Buzad route for the second runway, unlikely to have a major impact on the site compared with the MBU single runway scenario [MBU Making Best Use – achieving maximum capacity with a single runway]. However, there is the potential for the 2 runway airport to operate in segregated mode which would worsen the potential noise impact on the site.

“The decision regarding the West of Stevenage site should not be taken as setting a precedent regarding this site. Whilst there are similarities, there seems every likelihood that this site will suffer from a worsening noise environment, whereas the West of Stevenage site is likely to experience an improving environment.”

Using these conclusions as a basis, paragraphs 34 and 35 of Hertfordshire County Council’s submission to the East of England Plan inquiry stated:

“North of Harlow is...constrained by many overlapping constraints, including aircraft noise associated with an expanding Stansted Airport. The area lies outside the day and night noise contours referred to in PPG24 but is below the easterly landing route to the airport which is used 25-40% of the time by arriving aircraft. A report by consultants to Hertfordshire, Essex and East Hertfordshire considers the noise implications of operations at Stansted for the area and a copy has been placed in the Library. Noise levels will cause disturbance and the implications of a second runway are not known.”

The independent Planning Panel on the East of England Plan considered the Castella Stanger Report (document TRN86 listed within Appendix II to the report of the Panel) but did not address the issue of noise in relation to North of Harlow within the report itself.

East of England Plan – Report of the Panel (June 2006)

This is the report of an independent planning panel of planning inspectors appointed to examine the draft East of England Plan. The report states that:

“The options for growth in and around Harlow have been the subject of a number of studies (eg documents SRS6, SRS10, SRS16, TRN29, and TRN29A-J). There is a general perception, which we share, that Harlow has a need for significant additional housing, and that growth is required to support regeneration priorities for the town. Opinions differ, however, about whether the 20,700 additional homes proposed (together with a further 6,000 at North Weald) will support or hinder regeneration. The arguments relate as much to the form and location of development as to its quantity.

“There is evidence for the general proposition that in principle the more growth there is the greater the prospect that it will support increases in local employment, an expanding role for the town centre, the provision of infrastructure and resources for economic regeneration. However, for all that to happen there is in our view a need for the growth to be of such a form, and carried out in such a way, as to ensure that it is part of the town and does not acquire a separate identity and momentum which could undermine the progress of the town itself. This we would take to be part of the definition of a sustainable urban extension. (Paragraph 5.86)”

“In conclusion we recognise that the proposals at Harlow north and North Weald would be capable of producing a large amount of additional housing in due course, as well as jobs and supporting infrastructure. However, in view of the need to invest in the HQPT [High Quality Passenger Transport] and resolve the strategic water cycle issues we would not see either location making a major contribution until the latter half of the Plan period. Even then, and assuming water cycle and transport issues could be resolved, there are also objections on landscape and other environmental grounds, particularly for Harlow north, and there remain questions about whether the dynamism of relatively self-contained development at both locations could be made to support the functioning and regeneration of Harlow. The proposed strategy, in relying on “satellite” settlements rather than urban extensions integrated with the town, runs the risk that these will function as rival attractions in terms of the housing market and economic activity. (Paragraph 5.94) We therefore conclude that the strategy should refocus on the opportunities within Harlow and other directions of growth to the east, south and west of the town (Paragraph 5.95)”

In relation to Stansted Airport and the A120, the report of the independent planning panel on the draft plan states: *“We also find there is much to support the Plan’s strategy of channelling housing and job growth not directly related to the airport to Harlow. The nearby towns of Bishop’s Stortford, Dunmow and Braintree have already provided considerable housing, but much of this appears to have been taken up by people commuting to work elsewhere rather than working at Stansted or in (airport related or other) jobs created locally. While there is a certain amount of further scope for development at these towns, the capacity for both housing and employment growth is greater at Harlow (even with the reduction in housing we have proposed at R5.10). (Paragraph 5.102)”*

East of England Plan – Secretary of State’s Decisions (December 2006)

The Secretary of State disagreed with the conclusions of the panel and rejected the recommendations in respect of north of Harlow with the following counter-arguments:

- the water cycle issues are a matter of timing, not of principle (page 26)
- north of Harlow is in close proximity to the station, town centre, and employment areas (page 26)
- an appropriate planning framework would address concerns about a ‘satellite settlement’ (page 26-7)

- development north of Harlow would not be a threat to regeneration because there will be a lead-in time of at least 5 and possibly 10 years for a push on regeneration within the existing urban area before development north of Harlow would be of significant scale (page 27)
- landscape features are of local importance. A suitable Green Infrastructure framework would retain much of the attractive environmental features (page 27)
- there is potential North of Harlow for a major development of a large enough scale to be a model of sustainable development;
- this is a significant and rare opportunity for somewhere so close to London (page 28)
- the context, which the Panel acknowledges, of the need to move to a higher level of growth than they recommend; (page 28)
- the need to avoid further Green Belt Review before 2031 (page 28)

Based on the Secretary of State's decisions, the adopted East of England Plan (May 2008) included the following text in Policy HA1: "*The review to the north should provide for an eventual development of at least 10,000 dwellings and possibly significantly more – of a large enough scale to be a model of sustainable development. The review here should test the capacity to achieve the most sustainable size of urban extension in the longer term without the need for a further Green belt review*"⁶¹.

Regional Scale Settlement Study (Arup, 2009)

The study was prepared to support the East of England Plan Review to 2031. It investigates possible locations for developments of 20,000 dwellings to accommodate about 40,000 people and providing or allowing good access to jobs for 18,400 workers. It is suggested that development of such a scale has a number of sustainability advantages, including the provision of balanced and self contained communities, providing critical mass to deliver new infrastructure, and reinforcing the region's pattern of development including its relationship to London. The development of 'Regional Cities' would enable better competition with 'core cities' elsewhere in the UK and emerging centres such as Milton Keynes.

Hertfordshire has a long history in delivering regional scale settlements, primarily in the form of new settlements. The first Garden Cities (Letchworth and Welwyn) and four of the first generation New Towns (Stevenage, Hemel Hempstead, Hatfield and Welwyn) were developed with the County. More recently larger scale growth has been focused on expanding existing areas, such as Stevenage.... The most recent growth strategy for Hertfordshire sought to maintain the existing settlement pattern of small and medium sized towns.

Stevenage, Dacorum, Basildon and Harlow are struggling the most to deliver the required levels of growth. Although it is acknowledged that Harlow's apparently poor delivery rate may in part be due to the fact that this growth has not been apportioned to the surrounding districts, where much of the

⁶¹ East of England Plan (EERA, 2008), page 98

growth will take place. Stansted Airport is indicated as a major driver of economic growth.

The study examines the 21 'Key Centres for Development and Change' or KCDCs identified in the East of England Plan. The study suggests that Cambridge, Chelmsford and Norwich have potential for regional scale growth. Ipswich, Colchester and Bury St Edmunds are suggested as KCDCs with potential to become larger. The remainder of the KCDCs, including Stevenage, Harlow and Welwyn Garden City are called 'trend KCDCs'. This means that while they could grow substantially, they will not be able to accommodate development of 20,000 dwellings. It should be noted that because the Arup study was prepared in the context of the East of England Plan review to 2031, the categorisation of Harlow as a trend KCDC is based on the premise that it is already due to receive at least 10,000 dwellings north of Harlow, as required by Policy HA1 of the East of England Plan 2008, which ran to 2021. New regional settlements could be considered in the area of Braintree and south of the A120 in Essex to accommodate growth pressures from Stanstead airport.

Being located on the national motorway network (M11 and M25) and having good rail connections to London, Harlow has excellent strategic and locational advantages in terms of attracting new development. The London to Stansted corridor has been identified as a regional transport investment priority, improvements to which should open up new capacity and opportunities for development by further improving connections to the key regional economic drivers of London, Stansted and Cambridge....Despite its designation as a major regional housing growth point, population and jobs growth beyond 2021 is however low. Projected growth in the adjoining districts of Broxbourne, East Hertfordshire and Epping Forest is far more buoyant, and there may be opportunities to divert some of this growth to Harlow, if the decision is taken to pursue a regional scale settlement in this location. However, given the scale of existing planned growth in this area for the period up to 2021, it seems unlikely that additional significant growth could be accommodated post 2021.⁶²

Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

The study incorporated findings of the Harlow Infrastructure Study and does not add significantly to that study in respect of Harlow.

Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)

Using a criteria-based approach to assess the best locations for strategic employment development in the county⁶³, 6 existing strategic locations were identified⁶⁴, and 9 potential locations⁶⁵, including Bishop's Stortford and

⁶² Page 172

⁶³ The criteria were that a site must be: of an appropriate scale, of an appropriate quality, able to build a clear identity, able to demonstrate a good fit with wider policy. See pages 76-77 of the study.

⁶⁴ Gunnels Wood in Stevenage, Maylands in Hemel Hempstead, Hatfield Business Park, Leavesden Studios in Three Rivers District, and Watford Junction.

Harlow North in East Herts⁶⁶. All of these potential locations included considerable delivery problems, including Green Belt and or access constraints. However, the study suggested that ‘exceptional circumstances’ could be used to justify Green Belt release for the provision of high quality employment land in these cases⁶⁷.

The study highlighted the urgent need for additional strategic employment locations in Hertfordshire in order to meet a projected demand for 16% growth in employment in the County by 2031, amounting to an additional 79,400 jobs on top of the existing 500,000 jobs. Growth is expected to come mainly from the professional, finance and banking sector, software and digital, and logistics. In order to compete effectively with other centres such as Berkshire or Cambridgeshire it was recommended that suitable additional strategic employment sites should be pursued.

The study suggests that north of Harlow may be suitable for a major business park but this is dependent on large-scale residential development. The study notes that there is some strong local opposition and there are also a number of transport constraints:

*“Harlow, as with many New Towns, benefits from having a strong critical mass of employment – focused in Temple Fields on the north side of the town and Pinnacles to the west. There is also some office employment around the town centre and Harlow Town Station...Harlow North would relate well to the existing employment locations in the town and current market. However the disincentives relate to the limited strength of road connections to the M11, which might require improvement (such as through delivery of a link road to the north of the town and new junction). Perceptions of the town would also act as a disincentive to office investment, albeit recognising the potential for Harlow North to address deficiencies in its socio-economic/occupational profile from an investment perspective....The location could be considered for possible strategic employment development should the wider Harlow North development be progressed, and depending on the scale of this and transport infrastructure provided. The site offers some potential for office accommodation, particularly close to the station as part of a broader district centre/ heart to the new development. However the scale of development may not be of a sub-regional/ regional significance. This would require delivery of a business park and likely a link road to the M11. To conclude however, at present, the Harlow North site is considered to have significant delivery risks (due to uncertainties around the delivery of Harlow North) which suggest that the site may not come forward”.*⁶⁸

⁶⁵ The other potential locations were Park Plaza in Waltham Abbey, Croxley and Watford Business Parks, Knebworth Innovation Park in Stevenage, Watford Health Campus, The Buildings Research Establishment (BRE) in St. Albans District, London Road, St. Albans,

⁶⁶ The GSK Cluster including Ware was considered, although no expansion potential was identified. Foxholes in Hertford discounted as it does not meet the necessary criteria for definition of a strategic employment site.

⁶⁷ See page 62 of the Study.

⁶⁸ Pages 93-94, paragraphs 6.102 to 6.106

The study concluded that the best location for a premier business park would be at Park Plaza, Waltham Cross, adjacent to the M25; and at Watford Junction for development of a major, high quality in-town office quarter.

Hertfordshire Strategic Green Infrastructure Plan (Land Use Consultants, 2011)

There are no specific projects mentioned north of Harlow. However, Project 7: Lee Valley Regional Park – Lateral Links is described as follows:

RURAL & URBAN BLUE LINKS - Brief description / snapshot of the project:
Seeking to enhance accessibility to the strategic GI asset from the green transport network & at points on the park boundary, & helping to address greenspace & health deprivation in urban areas in the valley/adjoining the park area

- Creation of enhanced lateral links to/around the park, to address deprivation. Enhanced links should be made from public transport nodes & from within the urban area of Hoddesdon, & enhanced signage & from settlements within Broxbourne Borough, as well as addressing disjointed links across land in multiple ownerships e.g. in East Herts District, & creating safe links to & from Epping Forest, as well as to wider open space network in general
- Enhanced signage, promotion & legibility of existing connections for people across the park
- Project includes woodland & habitat creation in delivering Living Landscapes, e.g. creation of habitat as well as people connectivity to link Lee Valley to wider landscape
- Enhanced public transport network links, seeking to overcome access barriers (e.g. to reservoirs)
- Creation of enhanced connections to other strategic GI assets such as Epping Forest & the Stort Valley, plus enhanced connections to All London Green Grid including London Loop
- Project links closely to Project 9: Reconnect, & also gives expression to local GI links in the Harlow Green Infrastructure Plan
- Links to Project 10: Green Hertfordshire/Greening the GreenArc: promotion of the GI asset & links in the Lee Valley & helping secure links to the Olympic Legacy

Other documents:

A Sense of Place: Design Guidelines for development near high voltage power lines (National Grid and David Lock Associates, 2004)

This document sets out the requirements for set-back of residential and other development away from high voltage power lines to address health concerns. The document suggests how the layout of development can be structured to provide open space in a corridor on each side of power lines. For further information see www.nationalgrid.com/uk/senseofplace.

Broxbourne Core Strategy – Final Inspectors Report (December 2011)

Paragraph 54 of the Report stated: *The allocation [of a major retail park at Brookfield Farm] would result in higher percentage impacts in adjoining LPAs, at Harlow and Enfield. Enfield is a relatively healthy centre and may be able to*

withstand a loss of about 9%. At Harlow, the repercussions are likely to be more severe. The town centre already had a 17% vacancy rate at the time of the hearings. The planned investment on the Water Gardens site in the town centre could be severely prejudiced. I share the concerns of both adjoining authorities, who made strong objections to this part of the CS, that impacts of this level would unacceptably harm the vitality and viability of their centres. In summary, the CS strategic allocation would draw trade from established town centres to an out of centre location.

Paragraph 56 goes on to state: *Greater Brookfield is expected to generate about 2,000 jobs, including part-time jobs, mainly in retailing and leisure facilities. However, in general these are unlikely to be of a type critical to the employment strategy to create higher-order, knowledge-based employment. The reliance on projected trade draw would be likely to result in job losses or constrained growth in nearby centres such as Harlow, Enfield and Welwyn Garden City, as well as the Borough's own town centres such as Hoddesdon and Waltham Cross. This is not therefore a very weighty consideration in favour of the proposal.*

Issues and Options Consultation Feedback (autumn 2010):

The Issues and Options consultation brought forward many comments regarding the future growth of Harlow. Question 43 in the consultation document was split into two parts as follows:

- a. Do you agree with the consultants Suggested Approach in respect of growth to the north of Harlow? If not, how would you distribute development in accordance with Policy HA1 of the East of England Plan and why?
- b. If development to the north of Harlow is no longer required by the East of England Plan, should we consider north of Harlow as a broad location to meet some of East Herts district wide housing requirement?

The matters raised in response to the consultation detailed below, concern the area as a whole, as Sub-Areas were not defined at that stage. Given the volume of comments raised in response to this area, the summary below presents the main issues raised.

Representations received from specific consultees included the following points:

High Wych, Hunsdon, Widford, and Eastwick and Gilston Parish Councils disagreed with the Consultants' recommended option, pointing out that Option C is the Consultants' preferred option in the absence of the East of England Plan. It was suggested that there is no budget to pay for infrastructure. It was pointed out that the independent planning panel to the East of England Plan did not agree with development north of Harlow. The Parish Councils support Gilston Great Park as an alternative. Instead, the Parish Councils supports limited housing development to meet local needs.

Sawbridgeworth Town Council suggested that the East of England Plan is now irrelevant. Several other Parish Councils and Civic Societies objected to development north of Harlow for similar reasons.

Hertfordshire Association of Parish and Town Councils stated that “We would be strongly against the suggested massive development North of Harlow which in our opinion would have a disastrous effect on Hertford, Ware and Bishop's Stortford. Development on this scale, including a Green Belt Review, could lead to the creation of a continuous urban conurbation from Hertford to Bishop's Stortford to the detriment of generations to come.”

The Hertfordshire Gardens Trust stated that: “The locations for any future housing developments need to be considered with regards to existing Hertfordshire communities, not with a town in Essex. Coalescence of communities is undesirable and existing transport links and local amenities should be taken into account rather than a broad-brush strategy such as the East of England Plan.”

392 non-standard objections were received. Most of these came from Sawbridgeworth, Bishop's Stortford, and the nearby villages. The main concerns were in relation to the loss of Green Belt land, impact on the historic settlements and open countryside, impact on wildlife sites, and congestion in Sawbridgeworth and nearby villages. Concerns were also raised regarding the possible cancer risk of the line of pylons crossing the area.

363 responses were received in support of proposals for development north of Harlow. Many of these came from further afield, including Hertford and Ware and villages outside the south-eastern part of the district. Matters raised included the contribution to East Herts housing need, sustainability features of large-scale development, and the possibility for large-scale development in this location to relieve pressure on existing towns and villages elsewhere in the district.

Harlow Council's response states that:

“Harlow Council is committed to the regeneration of Harlow through housing and economic growth, which are important catalysts for securing investment and delivering the regeneration of Harlow. This will ensure that Harlow Council's strategic aims to change the image of the town, diversify the range of housing, deliver new infrastructure and to enhance Harlow Town Centre's sub-regional role can be delivered. A thriving town will benefit both the residents of Harlow and the surrounding area...”

“Harlow Council considers that Chapter 10 [of the East Herts Issues and Options consultation document] does not adequately articulate the justification for growth in and around Harlow. As outlined in the covering letter, the regeneration of Harlow is the priority of Harlow Council and the Council believes that housing and economic growth is necessary to deliver the regeneration of the town. Regeneration will have a wider ‘ripple’ effect and the benefits would be felt in the wider area, including EHDC. Future iterations of

EHDC's Core Strategy should acknowledge that housing growth is needed to secure and sustain the regeneration of Harlow...Harlow Council understands, from technical work prepared so far, that growth to the north of Harlow offers positive regeneration benefits for Harlow"

Harlow Renaissance also supported development north of Harlow on similar grounds, and pointed out that the abolition of the East of England Plan means that development to the north could make a significant contribution towards East Herts Council's housing needs, including affordable housing.

Essex County Council stated: "The County Council supports major strategic growth at Harlow for new housing, economic development and retail. It is considered that further residential, economic, social and physical infrastructure growth at Harlow will benefit the existing and future population within Harlow and the neighbouring visiting, resident, investing and working communities from Hertfordshire and Essex. ...Growth at Harlow will transform the town providing opportunities to -

- *Reduce deprivation within the existing communities of Harlow;*
- *Regenerate existing communities within Harlow;*
- *Enhance and increase the viability for delivering economic, social and leisure opportunities for Harlow and the surrounding areas existing and future population;*
- *Enhance the viability to deliver social and physical infrastructure;*
- *Deliver an improved sub regional role for the town benefiting Hertfordshire and Essex communities; and*
- *Deliver sustainable development.*

"The County Council considers housing growth at Harlow should provide for an appropriate socio economic mix. It should ensure growth does not result in a polarisation/concentration of attractive wealthy suburban locations with a declining inner core. It is considered that at Harlow there are opportunities to deliver balanced mixed communities within the inner core focusing on priority estates and urban extension(s).

"Growth will promote private sector investment to ensure the town delivers an improved sub regional retail and leisure offer, consistent with PPS1. PPS1 highlights that development that attracts a large number of people, especially retail, leisure and office development should be concentrated in existing centres to promote vitality and viability, social inclusion and more sustainable development (CLG, 2005, 12)...The County Council considers that growth at Harlow will enhance the feasibility of public and private sector collaborative working to improve Harlow's social and transportation infrastructure."...

The County Council considers that growth at Harlow will –

- *Contribute positively to the regeneration of the town and the development of Harlow as a sub-regional centre;*
- *Meet sustainable development criteria as Harlow is well connected to the strategic transportation network (not withstanding that future growth will*

require transportation improvements); there is existing social and community infrastructure that may be enhanced benefiting the existing communities within Harlow and the neighbouring authorities within Hertfordshire and Essex;

- Provide economic opportunities for existing communities within Harlow and neighbouring planning authorities such as East Herts;
- Allow improved connectivity to London/Cambridge/Chelmsford and other key employment centres within Hertfordshire and Essex to reinforce economic linkages and opportunities for existing and future communities;
- Facilitate the delivery of improved social, transportation and physical infrastructure required within the community.

Hertfordshire County Council stated:

“The County Council's position on Harlow growth and growth to the north of Harlow were set out clearly in its engagement with the East of England Plan preparation process - the scale of growth was not adequately justified, the case for the perceived causal links between housing growth and regeneration benefits not adequately made, large scale new settlement size development to the north of Harlow would not be linked adequately to the town and would operate as a satellite and competing settlement rather than towards Harlow regeneration, the adverse impacts on land to the north of Harlow are unacceptable....The County Council considered that the Secretary of State's reasons for setting aside the EiP Panel's conclusions and recommendations was flawed. This remains the case. As such, the County Council takes the view that unless there is substantive evidence to the contrary, the EiP Panel's conclusion that the growth strategy for Harlow should be one based on development within the town and peripheral growth to the east, south and west should be progressed.”

In relation to part b of the question, Hertfordshire County Council stated:

“The future housing ‘need’ within East Hertfordshire is predominantly generated by the communities that live within its settlements and those households that are projected to migrate to those settlements. Whether a new settlement to the north of Harlow would match that ‘need’ is clearly questionable and any case for such growth at this location would need to be substantiated by technical evidence and the views of existing and where possible arriving communities and households. If development to the north of Harlow is considered appropriate to meet the needs of the District then that approach will need to be appraised (including SA/SEA) against the other options identified in the consultation document and any other identified alternatives.”

Epping Forest District Council stated that the consultants’ proposed extensions into Epping Forest District would impact rural areas which do not have the services to provide for such growth.

2279 standard responses were received, which objected to proposals for large-scale development north of Harlow. The response forms consisted of 6 statements as follows:

- *I do not agree with the consultant's suggested approach in respect of growth north of Harlow. It was constrained by policy HA1 of the East of England Plan which has since been revoked. The consultants' own work indicates that, without that constraint, Option C is the preferred approach. The consultants' approach is unsustainable and will do untold economic and environmental damage.*
- *There is no longer any need to distribute development in accordance with policy HA1 of the East of England Plan as the Plan has been revoked by the new Government. I support a better not a bigger Harlow.*
- *The Green fields north of Harlow are not suitable as a broad location to meet district wide housing requirements. The area should remain an essential part of (an extended) Green Belt.*
- *The towns and villages north of Harlow should be treated in the Local Development Framework no differently from other towns and villages of similar size and character in the district.*
- *I support limited housing to meet local needs in accordance with locally developed parish and town plans*
- *I strongly object to major development north of Harlow*

Although not on a standard response form, the same words also appeared in the submissions of a number of other individuals and organisations.

STOP Harlow North submitted a detailed response, which was endorsed by Eastwick and Gilston and Hunsdon, Much Hadham, and Widford Parish Councils, and Sawbridgeworth Town Council. The submission raised a wide range of concerns⁶⁹, and drew attention to the recommendations of the East of England Plan Panel, which suggested that development to the north of Harlow would be a distraction from the main objective of regenerating Harlow. This document is summarised in the 'Parish/Community Documents' section above.

Eastwick and Gilston Parish Council submitted a proposal for 'Gilston Great Park' north of Harlow. High Wych, Hunsdon, Stanstead Abbots and Widford Parish Councils, and Sawbridgeworth Town Council all stated their support for this proposal. The proposal is summarised in the 'Parish/Community Documents' section above.

The Environment Agency stated that development should avoid the Stort floodplain and the streams flowing across the area; and that development would need to be accompanied by a sustainable drainage strategy which would reduce runoff rates to Greenfield levels.

⁶⁹ Concerns related to transport and highways, biodiversity, settlement character, Green Belt, aircraft noise and others.

The Highways Agency stated that the changing nature of regional planning would impact on East Herts' plans and should be monitored.

CPRE – The Hertfordshire Society stated that development north of Harlow would effectively create a new settlement in the Green Belt, which is not justified in the document.

East Herts Ramblers objected to development north of Harlow.

National Grid stated that: *“Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.... National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court.”* National grid's submission refers to design guidance to mitigate the impact of development around overhead power lines⁷⁰.

Bishop's Stortford Town Council made the following comment in response to question 22 about district-wide growth options: *“The Town Council believes that it may not be realistic to accommodate housing demand within the boundaries of existing settlements without significantly compromising quality of life of these settlements and would therefore request that consideration be given to the construction of a new, self contained, sustainable and vibrant community in the A10 corridor or a limited development on East Herts District Land North of Harlow if it is eventually accepted that significant development is necessary.”*

Watton-at-Stone Parish Council suggested that development should be pursued north of Harlow *“Provided the area remains within East Hertfordshire and thereby reduces the number of additional houses required in the rest of the district”*.

Hoddesdon

⁷⁰ *“A Sense of Place: Design Guidelines for development near high voltage power lines”* (National Grid and David Lock Associates, 2004) - available online at www.nationalgrid.com/uk/senseofplace

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy.

The second part sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

The documents in the first part of this section are as follows:

- East Herts Local Plan Second Review – Inspector's report (2007)
- Hertfordshire Strategic Employment Sites Study (Regeneris, 2011)
- Strategic Housing Market Assessment (ORS, 2010)
- Broxbourne Submission Core Strategy (December 2010)
- Hoddesdon Town Centre Strategy (2010)

East Herts Local Plan Second Review – Inspector’s Report (Feb 2007)

Chapter 17 of the Inspector’s Report includes comments on parts of this area of search as follows:

Omission Site 527: Ware Road, Hoddesdon

“This is a very large greenfield site of some 18 hectares and its development would involve a substantial urban expansion into the Green Belt. Development to the south is sporadic. Given the topography of the land, housing, here would be intrusive and would encroach into countryside which forms an effective buffer between Hoddesdon and Great Amwell. It would add to the coalescence between settlements. There is no identified need to release more land to meet Structure Plan requirements during the Plan period. Therefore, I find no exceptional circumstances to justify the release of this land from the Green Belt.”

Omission Site 427: Hillside Nursery, Ware Road

“The site was last used as a nursery, which ceased to operate after the storms of 1987. Since then, it has lain unused and while there are still visible remnants of the nursery use, in the form of derelict buildings or structures, much of the site is overgrown.

“I don’t refute the evidence of contamination of the land, nor indeed the costs involved with resolving the issue. However, the appearance or condition of land is not pertinent to its Green Belt status, nor is it a matter that justifies a revision of the Green Belt boundary. It has to be said that, as undeveloped land on the edge of Hoddesdon, and an integral part of the extensive swathe of Green Belt, it plays a valuable role in safeguarding the countryside from encroachment, as well as preventing the merger of Hoddesdon, Great Amwell and Ware. Given the Council’s position with regard to the housing land supply issue, there is no need for me to extend the search for additional housing land, which additionally removes another basis for the Green Belt alteration.

“The site may well have once been developed with structures associated with the horticultural business. The site may be classed as previously developed land and indeed, as with a number of urban edge sites, it features well on the accessibility scale. These factors do not necessarily place it favourably in the sequential hierarchy of sites. In my view, allocation of this site would run counter to the Structure Plan principle of directing development to the larger towns of this District and to the EHDC approach to dwelling distribution across E Herts. I do not support inclusion of this site in place of any of the allocations in the Plan.”

Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)

The study identified Park Plaza at the A10/M25 junction as a potential Premier Business Park.

Strategic Housing Market Assessment (ORS, 2010)

The study suggested that Hoddesdon lies within the A10 Corridor Housing Market Area. In terms of travel-to-work patterns, there are close ties between Hertford, Ware and Hoddesdon.

Broxbourne Submission Core Strategy (December 2010)

This proposed a business park at Park Plaza together with comprehensive redevelopment at Greater Brookfield, consisting of a large retail centre and around 300 residential dwellings. The Inspector's Report on the Core Strategy (December 2011) required removal of this proposal from the strategy, on the grounds that it would create a new sub-regional centre which could undermine existing centres including Harlow as well as undermining nearby centres including Waltham Cross. Broxbourne Council has not adopted its Core strategy and it is understood that work is currently commencing on a new Local Plan.

Hoddesdon Town Centre Strategy (2010)

This document addresses the under-use of the town centre, which is partly attributed to pedestrianisation of the High Street in the 1990s and subsequent fall-off in trade.

Issues and Options Consultation Feedback (autumn 2010)

Broxbourne Council included the following points in its submission:

- Avoid locations which could avoid undue pressure on the A10
- Avoid causing downstream flooding on the River Lea
- The two Councils should work together to protect and enhance the Lea Valley Regional Park
- The two Councils should work together in respect of Green Infrastructure and Broxbourne Woods in particular
- The strategic gap between Hoddesdon and Great Amwell should be kept free of development
- Hoddesdon is served by Rye Meads Sewage Treatment Works where capacity is constrained. Development in East Herts which causes strain on Rye Meads would be a cause for concern.

No other comments about Hoddesdon were received.

Stevenage

East of Stevenage

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and

6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy.

The second part of this section sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

The documents in the first part of this section have been grouped as follows:

Town/Community Documents:

- The now withdrawn Core Strategy (2012) for Stevenage represents the most up-to-date town-wide document for the borough.

Housing Documents:

- East Herts Strategic Housing Market Assessment (ORS, 2010)
- Stevenage Strategic Housing Market Assessment Update (DCA UK, 2010)

Land Availability Documents:

- Stevenage Strategic Housing Land Availability Assessment (2010)
- The Strategic Land Availability Assessment (East Herts Council, 2012)

Economy Documents (Employment/Retail):

- Stevenage Retail Assessment (King Sturge, 2009)
- Skills and Employment Study (DTZ Piedad, 2005)
- Stevenage Employment Capacity Study (DTZ, 2006)
- Stevenage Employment Capacity Update (2010)
- Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)
- Stevenage Education Study (DTZ Piedad, 2006)

Flooding and Water Infrastructure Documents:

- Stevenage Strategic Flood Risk Assessment (Faber Maunsell, 2009)
- Strategic Flood Risk Assessment (East Herts Council, 2008)
- Rye Meads Water Cycle Study (Hyder, 2009)

Infrastructure Documents:

- Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)

Transport Documents:

- Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009)
- Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)

- Stevenage Transport and Utilities Capacity Study: Additional Development Areas (Arup, 2006)
- Stevenage Urban Transport Plan (Aecom, 2010)

Sport and Leisure Documents:

- PPG17 Audit and Assessment (PMP, 2005)
- East Herts Assessment of Sports Facilities (East Herts Council, June 2011)
- East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

Green Infrastructure Documents:

- East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)
- Stevenage Landscape Sensitivity and Capacity Study, (Halcrow, 2006)
- Stevenage Biodiversity Action Plan (Herts and Middlesex Wildlife Trust, 2010)
- Stevenage Green Space Strategy 2010-2020: A strategy for the green infrastructure of Stevenage (Stevenage Borough Council, 2010)

Town/Community Documents:

The now withdrawn Core Strategy (2012) for Stevenage represents the most up-to-date town-wide document for the borough.

Housing Documents:

East Herts Strategic Housing Market Assessment (ORS, 2010)

Undertaken after the Stevenage SHMA, the report identifies primarily the market areas within which people are likely to live work and seek to move within. The report indicates that area to the east of Stevenage falls within the Stevenage and A1(M) Corridor Housing Market Area as opposed to the A10 Housing Market Area.

Stevenage Strategic Housing Market Assessment Update (DCA UK, 2010)

Originally undertaken in 2008, this study gathers evidence to the type of housing that is needed in Stevenage and North Hertfordshire and recommends targets for affordable housing provision. The Assessment indicates that 40% of Stevenage residents have an income of less than £24,036, and even with low mortgage rates, the requirement to have high deposits makes affordability a key issue for those wishing to buy.

Land Availability Documents:

Stevenage Strategic Housing Land Availability Assessment (2010)

The only sites that have been considered throughout the preparation of the Stevenage Core Strategy are within the built up area or to the north and west of the town as part of the Stevenage and North Herts Action Plan.

East Herts Strategic Land Availability Assessment (East Herts Council, 2012)

Does not consider land outside the existing built up areas of the East Herts towns.

In September 2011, the Council initiated the SLAA Partnership to obtain feedback from stakeholders regarding deliverability of development and strategic planning from the perspective of the market. In respect of Stevenage, stakeholders acknowledged the impacts on the Beane Valley landscape that would occur as a result of development. There was discussion over the value of Gresley Way as a natural boundary to the town, and the role of the Green Belt in preventing coalescence.

Impacts on infrastructure and resources were discussed, in particular water and sewerage utilities. Stakeholders noted that the area is some distance from the town centre and that massive social infrastructure would also be needed.

Stakeholders indicated that the development would serve the needs of Stevenage although East Herts would receive the New Home Bonus funds. The need for a boundary change in the longer term was suggested.

Economy Documents (Employment/Retail):

Stevenage Retail Assessment (King Sturge, 2009)

This study considers the trends affecting retailing up to 2026; considers briefly the retail planning policy context; and assesses retailing in Stevenage both in a regional and sub-regional context. An assessment of the town's retail areas and their future capacity is included along with broad locations available to potentially accommodate further retail development. The Retail Report indicated that the proposed growth to the north east and north of the town would result in the need for new convenience floorspace (circa 3,000m² gross) to meet the needs of new residents. Technical work would be necessary to assess the retail floorspace needs of a new neighbourhood circa 5,000 dwellings east of Gresley Way. This may impact on the viability of development in this location.

Skills and Employment Study (DTZ Piedad, 2005)

This study examines what level of employment Stevenage can expect to deliver in the light of regional growth scenarios, and the likely labour market requirements in terms of education and skills. Using a range of scenarios, the Study identifies a need for major growth in employment in order to seek an improved level of self-containment and a need for investment in the borough's education facilities to improve the educational attainment of school leavers. Shortages of highly skilled employees will need to be addressed, particularly as there are growth ambitions in the advanced manufacturing sector (including life sciences).

Stevenage Employment Capacity Study (DTZ, 2006)

The Stevenage Employment Capacity Study 2006 indicates that even on the best case scenario there would be sufficient capacity within existing or planned estates to accommodate potential employment growth. The previous studies indicated that the Pin Green Employment Area located to the north-east of the town (originally designed to counter-balance the Gunnels Wood Employment Area) was not a significant employment offer with several large vacant sites being in a less accessible location. Since this 2006 study a large

area of the employment land has been redeveloped for residential apartments.

Stevenage Employment Capacity Update (2010)

The Update Report seeks to address changes that occurred between the publication of the 2006 Employment Capacity Study and the submission of the Core Strategy. The Report identified a net loss of 60,000 square metres of employment floorspace stating that this would be offset by planned developments. However, many of these planned developments have been put on hold due to economic constraints. The Town Centre Partnership recently folded with major partners pulling out as the viability of the proposal was affected by the recession. A new employment area off Junction 7 of the A1(M) was planned as part of the Stevenage and North Herts Action Plan.

The Study indicated that the Pin Green Employment Area located to the north-east of the town (originally designed to counter-balance the Gunnels Wood Employment Area), was not a significant employment offer with several large vacant sites, being in a less accessible location. Indeed since this 2006 study, a large area of the employment land has been redeveloped for residential apartments. This suggests that land outside the Gunnels Wood area i.e. removed from the main road and rail connections serving the west of the town is not attractive to employers.

Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)

The Study identifies the Gunnels Wood Employment Area as a strategic site against the criteria used for the study. A Masterplan adopted by Stevenage Council for the Gunnels Wood area seeks to address issues of design, congestion and declining quality in some parts. The proposed new Bioscience Campus at Stevenage is also endorsed as a major opportunity to increase the county's share of the Life Science employment sector. In addition to the Gunnels Wood area, the Strategic Employment Sites Study identified the potential Knebworth Innovation Park as an additional option for new employment land. This sites lies immediately adjacent to the A1(M) Junction 7, and although is removed from Gunnels Wood is a significant opportunity. This site lies to the west of the town with existing motorway connections.

The study identified one existing and one proposed strategic site. Gunnels Wood is an existing 202 hectare site near the A1(M) junction 7 on the west of the town. It is home to 300 businesses providing 18,800 jobs. Gunnels Wood has good sustainable transport, with frequent bus services and Stevenage Station to the west. Stevenage BC has a draft Area Action Plan for Gunnels Wood, proposing a 19ha new office development named 'Silkin Park' to the south. The study suggests that Gunnels Wood is a strategic mixed use employment site.

Knebworth Innovation Park is a green field site adjacent to the A1(M) junction 7, and is proposed for development within Stevenage's draft Core Strategy as a 65,000 sq ft innovation/science park capable of attracting R&D activities. However, the area is located in close proximity to Knebworth Woods SSSI and is designated Green Belt, and would therefore could only be released for development if exceptional circumstances can be demonstrated. The site

would require joint working between Stevenage BC and North Hertfordshire DC to bring forward.

Stevenage Education Study (DTZ Pida, 2006)

The Education Study (2006) considered several growth scenarios, one of which included land to the east of the town (circa 2,200 homes) in addition to land to the north and west. In terms of primary education provision, the report stated that this expansion would result in a need for the nearby village school at Aston to take pupils, along with two other schools in Stevenage. Alternatively, one new school would have to be built as part of the development. Secondary provision could be accommodated within existing schools.

The Study identifies areas of underachievement and a poor reputation in a large number of schools in Stevenage. Plus 16 education levels are low and there are relatively fewer children going on to further education. Thus the gap between the skills and academic standard of school leavers and the requirements of local employers are widening. This in turn results in the importing of labour from outside the town.

Flooding Documents:

Stevenage Strategic Flood Risk Assessment (Faber Maunsell, 2009)

The Assessment identifies a small part of the land to the east of Stevenage as being at risk of surface water flooding around Aston End Brook. Currently, this flooding does not pose much risk to person or property. The Assessment suggests further modelling should be undertaken for the River Beane. Although the risk of flooding was minimal the Assessment stated that development around the town was highly likely to cause flooding further downstream.

Boxbury Flood Storage Reservoir lies in the northern part of the East of Stevenage Area of Search and forms a significant barrier to development.

Strategic Flood Risk Assessment (East Herts Council, 2008)

The East Herts Strategic Flood Risk Assessment identifies a risk from run-off and flash flooding events in and around Stevenage as a result of planned major development to the north and west of the town. The A602 Stevenage Road is vulnerable to extreme flooding incidents. The River Beane catchment area is noted as a flood watch area.

Rye Meads Water Cycle Strategy (Hyder, 2009)

The Rye Meads Water Cycle Study identified a need for a new waste water treatment works along the River Beane and discusses three options, each with their individual benefits and disadvantages depending upon their location along the watercourse. However, the Study was undertaken with the assumption that Stevenage would receive major growth to the north of the town. Other options were not considered and therefore further technical work may be needed to assess the potential impacts on the river environment and waste water treatment system from different scales of development should this option be progressed.

Infrastructure Documents:*Hertfordshire Infrastructure and Investment Strategy (Roger Tyms, 2009)*

The study provides useful information and estimated costs for most of the major types of infrastructure required to support growth. It covers the functions of Hertfordshire County Council (highways, education, children's services, libraries, fire and rescue, waste disposal) the District Councils (open space, sport and recreation, waste collection), other public sector agencies (NHS, police, ambulance service) as well as private sector infrastructure providers (gas, electricity, water supply and sewerage). It was not possible for the study to specify new items of infrastructure in particular locations, and therefore it is understood that this work will need to be undertaken alongside the emerging District strategy.

Transport Documents:*Hertfordshire Infrastructure & Investment Strategy Transport Technical Report (URS, November 2009)*

The Report had the objective of providing a means by which the partners could prioritise and bid for infrastructure 'interventions' (schemes, 'soft' measures or initiatives).

The majority of interventions listed within the document are linked to locations outside the district; however, in respect of the Stevenage Area and East Herts specifically, a few areas to be addressed in Stevenage itself, or for routes leading to it, have been identified. The issues raised include:

- A602 Ware-Stevenage, Road Improvements;
- A1(M) ATM J6-8 improvements from north to south;
- A1(M) J8 capacity enhancement;
- Localised bus network improvements; and
- Rail capacity issues towards London in am peak period.

Hertfordshire's Local Transport Plan (LTP3) (HCC, April 2011)

LTP3 sets the framework for achieving a better transport system for all over a plan period of 20 years (2011-31). This plan will build upon the successes of LTP2 (which are summarised in the LTP2 Annual Progress Reports from 2007/08 to 2010/11) and focus on delivering the goals of supporting economic growth, achieving behavioural change, enhancing the quality of life, safety and security and addressing transport's effect on climate change. The LTP comprises 3 main volumes and a number of associated daughter documents.

It is recognised in the LTP that the majority of schemes will be identified through the rolling programme of Urban Transport Plans. As development to the east of Stevenage was not considered at the time of writing, the report made no assumptions about the possible impacts such a development would have on the existing transport network in the town.

Stevenage Transport and Utilities Capacity Study: Additional Development Areas (Arup, 2006)

Written as an extension to a Capacity Study that focussed on planned development to the north and west of the town, Arup was commissioned by Stevenage Borough Council to undertake a study that provided a strategic assessment of the scale of infrastructure likely to be necessary to support such growth. The findings were reported in the Stevenage Transport and Utilities Capacity Study: Phase 1 Report. The subject of this report is to provide a strategic impact assessment of the transport implications of additional development areas highlighted to the east and south of Stevenage.

The impact of the east and south Stevenage development areas on transport infrastructure was assessed for three scenarios. It was assumed that these growth areas would be in addition to the level of growth to the north and west of Stevenage as assessed in the Phase 1 Report; and that the additional growth would not take place before 2011 but would be complete by 2021.

Table 2.1 East and South Stevenage Development Areas

Area	Description	Development Area	No. of Dwellings*
E	East Stevenage (Northern Section)	37.77ha	903
F	East Stevenage (Central & Southern Section)	50.87ha	1,217
		Subtotal	2,120
G	South East Stevenage	18.00ha	393
H	South Stevenage	54.87ha	1,197
		Subtotal	1,590
		Total	3,710

* - Inferred from Stevenage Borough Council estimates

The report indicates that a low level of development could be accommodated on existing road networks but a combination of areas would exacerbate congestion during peak times. Comparing the scenarios in terms of highway infrastructure, the development on the east of the town would be easier to accommodate than the development to the south. The southern Stevenage Borough Council Stevenage Transport and Utilities Capacity Study Additional Development Areas development areas would have a greater impact on traffic flows by placing further demand on the capacity restrained local road system and the already congested A602 Broadhall Way. Additional growth would increase pressure on the town centre and bus networks and new bus services would be needed to serve new developments.

Stevenage Urban Transport Plan (Aecom, 2010)

Covering the town of Stevenage and an area of influence around it, the Stevenage UTP considered the implications of growth based on the Regional Plan estimates, focussing on the SNAP proposals. As such, the option of development to the east of the town was not considered, and therefore there are no assumptions made about the possible impacts such a development would have on the existing transport network in the town. Of relevance however, was the option to make Gresley Way part of a ring-road around the town. This scheme was tabled at the public consultation as a means of extending the ring road however it was not clear whether this should involve

dualling Gresley Way. The modelling exercises undertaken as part of the UTP have shown that this route does not need to be upgraded to dual carriageway given the fact that motorists already treat it as an extension to the ring road. It is therefore considered that upgrading Gresley Way would not be beneficial or indeed cost effective. As such this specific scheme is not being progressed through the UTP. This option would need to be readdressed as part of transport modelling for development to the east of Stevenage as access would need to be gained from Gresley Way.

Sport and Leisure Documents:

PPG17 Audit and Assessment (PMP, 2005)

The Audit and Assessment refers to Stevenage as being within a 3km buffer around the East Herts District boundary, and therefore all the facilities within the town are within a reasonable distance of some East Herts residents. By including Stevenage and Welwyn Garden City within the 3km buffer suggests there is an oversupply of indoor sports facilities.

East Herts Assessment of Sports Facilities (East Herts Council, June 2011)

Two reports highlight the fact that users of facilities are not constrained by district boundaries. Residents of East Herts will use facilities within Stevenage and vice versa where the need arises. The Assessment refers to schools within Stevenage that have benefited from the Building Schools for the Future Programme in terms of their potential offer to the wider public as a result of Public Use Agreements. The nearest indoor bowls centre and indoor tennis courts for East Herts residents are within Stevenage.

East Herts Playing Pitch Strategy (Knight Kavanagh & Page, July 2010)

Cross-boundary migration is limited. A small number of clubs from Stevenage use facilities in East Herts as do a small number of clubs from Broxbourne. However, there is also some out-migration of clubs to Harlow and Broxbourne as access to facilities, for clubs based in the south of the District, is perceived to be good.

Referring to Stevenage Borough Council, the Strategy states that the Council is in the process of updating its 2006 Open Space, Sport & Recreation Study through the preparation of a Sports Facility Strategy which will incorporate a Playing Pitch Strategy.

It is likely migration between Stevenage and villages in East Herts. Building Schools for the Future in Stevenage (Wave 4) may have implications as secondary school sites will have secured community use. There will also be a new secondary school which will replace Thomas Alleyne School proposed at Great Ashby, located in North East Stevenage, close to the boundary of East Herts.

Stevenage Borough Council anticipates that any new housing developments in the Borough should meet all their playing pitch (and other open space) requirements either within the Borough or within the SNAP area (SNAP being the joint area action plan which is being prepared with North Herts District

Council). It is not envisaged that future plans and proposals for the Borough will impact upon provision in East Herts.

Based on a 20 minute drive time (as recommended by Sport England), there are no significant gaps in the provision of golf courses in East Herts. Minor gaps are identified close to the Stevenage boundary; however, it is assumed that Stevenage Golf Centre (which provides an 18 hole course) would serve residents to the east of the District.

Green Infrastructure Documents:

East Herts Green Infrastructure Plan (Land Use Consultants, March 2011)

The GI Plan concludes with two projects of relevance to Stevenage: Project 3: River Valleys Project – Lee, Stort, Rib, Beane, Quin and Ash and Project 4: Lateral Links – Green Link between Bishop’s Stortford and Stevenage. The two projects aim to improve access to river environments and natural green space through the creation of linked recreational loops across the district. Project 4 provides scope for greater interpretation of historic elements if the district, such as the Roman Road east of Stevenage as part of the route.

Stevenage Landscape Sensitivity and Capacity Study, (Halcrow, 2006)

Figure 9 of the Appendices illustrate clearly that land immediately adjacent to the built up area of Stevenage (Chells Manor to northern part of Poplars) to the east of Gresley Way has moderate capacity for some development, being less visually sensitive than land to the east of the prominent ridgeline marking the edge of the Beane Valley. The whole of the land east of the town has a low capacity for employment development.

The Local Landscape Character Areas of relevance to the east of Stevenage Area of Search are as follows:

- 2 – Ladywood and Astonbury Farm
- 3 – Middle Beane Valley (South)
- 4 – Aston
- 5 – Aston End
- 6 – Chells Manor Farmland
- 7 – Middle Beane Valley (North)
- 10 – Boxbury Valley

Stevenage Biodiversity Action Plan (Herts and Middlesex Wildlife Trust, 2010)

Of particular interest in the Plan is the need to protect small pocket woodlands from encroachment and the ‘edge effects’ of development in close proximity. The Plan highlights the risk of the confinement of species within a small habitat resulting in isolation and vulnerability to external factors including from climate change. Once extinct, they are unlikely to recolonise from other sites.

Stevenage Green Space Strategy 2010-2020: A strategy for the green infrastructure of Stevenage (Stevenage Borough Council, 2010)

The Strategy includes an action plan to work with partners to improve and protect the River Beane and its tributaries. The Strategy also contains an objective to protect flood storage reservoirs from inappropriate development.

The standards suggested by the Strategy in terms of open space typologies should be applied to any new developments around the town.

Issues and Options Consultation Feedback (autumn 2010)

The Issues and Options consultation brought forward many comments regarding the future growth of Stevenage and also views on preferred development density. The following section details the pertinent points of the many representations, but, due to the purpose of the consultation having been to elicit representations of a strategic nature, it does not report those elements of submissions relating to the promotion of specific individual sites.

Representations received from specific consultees included the following points:

Stevenage Borough Council: support Option E (Towns, Stevenage and Welwyn Garden City) in so far as it relates to development to the east of Stevenage. It is important that the planning decisions of surrounding authorities do not restrict or prejudice the future growth and regeneration of Stevenage. A Green Belt Review would be needed and there is an opportunity for joint working.

Policy SV1 of the East of England Plan (EoEP) requires that a Green Belt review should allow for the continued growth of the Stevenage built up area until at least 2031. Our submission Core Strategy (Policy CS03) recognises that, beyond 2021, the best opportunities for this growth may lie in East Hertfordshire District. It establishes our intention to work with both North Hertfordshire and East Hertfordshire District Councils to ensure that the review of the Green Belt is fully effective.

Although the EoEP concentrates on development to the north and west of the town, the Panel Report was clear that [paragraph 5.115]:
[Stevenage Borough Council] also sought to open the door to development to the east and south. There may or may not be some potential for growth on those fringes...we consider this issue something to be explored and progressed at LDF level if appropriate.

The existing Green Belt boundary is tight against the urban edge to the east and south of Stevenage. There is currently no safeguarded land within the Borough nor within East Hertfordshire or North Hertfordshire Districts to meet longer-term development needs. The appropriateness of this as an approach will need to be reviewed. It is considered that development in and around Stevenage would contribute to sustainable patterns of development.

The Borough Council consider that there is scope to review the Green Belt boundary to the east of Stevenage whilst respecting the important separation between the town and the villages of Aston and Walkern.

In the event that the District Council is minded to review its housing target (and finds itself in a position to do so lawfully), a further iteration of, and consultation on, the Core Strategy and Sustainability Appraisal would be

required. This would need to identify and assess reasonable alternative housing growth levels and spatial options for that growth.

Notwithstanding the above, following the findings of the examination Inspector's report into the soundness of the Stevenage BC Core Strategy and its spatial strategy / housing numbers, the Borough Council may wish to see the housing target for EHDC amended or increased. This would be necessary to reflect any reduction in housing provision in the greater Stevenage area to ensure:

- That individual authorities make adequate housing provision to at least meet their own local needs. This would be necessary in the absence or reduction of any strategic growth at Stevenage that could have absorbed any under-provision elsewhere in the County; and / or
- That adequate provision is made within Hertfordshire for the people of Stevenage.

We will keep our position under review as described above so as to decide whether it is appropriate to pursue this objection or not.

We would strongly welcome any opportunities for joint or co-ordinated working with EHDC. In particular, the Borough Council would welcome the opportunity to work with EHDC to create a coherent and connected Green Belt boundary around the east of the town. This could contribute to a town-wide review that would allow scope for the continued growth of the Stevenage built up area to at least 2031, in conformity with the East of England Plan.

Studies produced to inform the EoEP identified Stevenage, along with Harlow, as the most appropriate foci for growth in the south-east of the region. The regenerative benefits of such an approach, the relative ease with which the existing New Town infrastructure could be expanded and the availability of sufficient capacity in the towns and their hinterlands were all identified.

The Borough Council considers that development to the east of Stevenage could potentially achieve the 'critical mass' required to deliver necessary supporting infrastructure including schools, shops and employment opportunities.

Thames Water Property Services: For the delivery of water and wastewater infrastructure it is easier to provide the necessary infrastructure for a small number of large clearly defined sites. As such our preference for growth would be for Options A, B and E. From the sewerage infrastructure perspective Option F is not considered to be concentrated and would not be a preferred method of delivery. Notwithstanding the above, given the constraints on Rye Meads STW (as set out in the Rye Meads Water Cycle Study) a balance would need to be struck as most of the large towns lie within the Rye Meads catchment.

East of England Development Agency: The appropriate approach to the development strategy must be an integrated response to the wider economic issues and challenges of the District and its economic sub -region, in

particular it should reflect the strategic approach taken by all the district councils to address the expansion of Harlow and Stevenage. As the plan acknowledges, the neighbouring settlements of Stevenage and, in particular, Harlow as well as the regeneration aspirations of the Lea Valley will all have an impact on the future of the district.

Hertford Heath Parish Council: Why couldn't Stevenage / Welwyn Garden City / Bishops Stortford be another option?

Harlow Council: Harlow Council believes that Harlow fulfils a similar role to that of Stevenage and Welwyn and therefore growth around Harlow should be compared to growth around Stevenage and Welwyn.

RSPB: While all the options have advantages and disadvantages, it is clear from the evidence provided in the SA that in terms of biodiversity, green infrastructure and climate change options B, C and D are preferable because they provide the flexibility to incorporate green infrastructure features and avoid negative effects on biodiversity. All the proposed development options (A-F) are likely to increase the pressure on water resources (which are already highly stressed). Further abstraction of water for new houses could reduce the base groundwater flow which supplies rivers upstream of Lee Valley. A reduction in river flow has the potential to affect the balance of biodiversity within the river corridors as well as reducing the quantity of water available for abstraction from river fed groundwater sources. In addition it could have an adverse impact on the Lee Valley SPA.

Aston Parish Council: We need East Herts to oppose any movement of the green belt boundary eastwards from Stevenage towards Aston, Walkern, and Datchworth; even though the Stevenage LDF states that they wish to agree such a movement with East Herts. It is vital to emphasise the need to preserve the rural nature of EH and to protect small villages from neighbouring big town expansion plans. We are strongly opposed to: Option D: because it means development in hamlets; Option E: because it includes major expansion east of Stevenage in EH green belt and in an area chronically short of water; and Option F: Because it will mean ribbon development along major roads, including the A602, where traffic has already expanded to some 23,000 vehicles/day. Hooks Cross is a hamlet on the A602 and has been on a bypass list for years. The need for a bypass increases with traffic volumes. More housing along a road like the A602 will increase demands for bypasses and therefore be counterproductive.

Hertfordshire County Council Passenger Transport Unit: In terms of passenger transport provision (bus accessibility), the towns and settlements have very different access characteristics across East Herts. The larger the settlement, the more readily available, sustainable transport is. The assessment of the transportation implications of development strategy/distribution options contained within the consultation document and the accompanying sustainability appraisal are broadly supported. Development in towns under Option A/E will add infrastructure stress but will

increase accessibility. Town roads already congested and may reach peak unless people switch to other modes, smarter choices essential.

Hertfordshire Property – Property:

Primary - Stevenage South East Villages

There are three primary schools in the planning area - [All Saints C E \(VA\) Primary Datchworth](#) (PAN 25), [Aston St Mary's C of E \(Aided\) Primary](#) (PAN 20) and [Benington C of E Primary](#) (PAN 16).

If housing development is provided in any of the villages in this area it would displace those children applying for a place at the schools from elsewhere. Ideally, HCC would want any expansion to allow schools to operate in straight year groups.

Stevenage South East Schools	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast
Total	61	61	63	59	39	41	43	43

- *All Saints, Datchworth* is full taking children from the local area, Stevenage, Knebworth, Watton-at-Stone, Welwyn and Welwyn Garden City. Accommodating children from any new housing development in Datchworth may be possible, but could impact upon the current pattern of allocation of school places to children from outside the village.
- *Aston* takes children both from the village and the local area. The capacity of the school would not be a bar on a limited amount of development in the village.
- *Benington* takes children both from the village and the local area. The capacity of the school would not be a bar on a limited amount of development in the village.

Primary - Buntingford Area

There is a three tier education system operating in the Buntingford area, which includes Puckeridge and some surrounding villages. The numbers fluctuate as some of the schools are primaries and therefore have a dip in numbers in years 5 and 6, whilst others are first schools where children move onto middle schools after year 4. Also, some schools feed secondary schools in Bishop's Stortford, whilst others feed the middle schools and Freman College in Buntingford.

There are three primary schools in the planning area - Ardeley St Lawrence Primary (PAN 18), [Layston Church of England First](#) (1FE) and [Millfield First & Nursery](#) (1½FE).

Buntingford Schools	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast
Total	93	78	60	68	56	64	62	62

There is currently some surplus capacity within the existing schools to cater for any additional need arising from new development. However, additional

provision may be required if any development resulted in a need of more than ½FE.

Secondary - Buntingford Area

The secondary schools in the three tier education system in the Buntingford area include middle schools in Buntingford and Puckeridge, and Freman College in Buntingford.

Middle Schools

There are two middle schools in the planning area - [Edwinstree C of E Middle](#) (PAN 112) in Buntingford and Ralph Sadleir Middle (3FE) in Puckeridge.

Middle Schools	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast	2023/24 F/cast
Total	202	170	186	208	200	203	202	183	189

There is no capacity within the existing schools to cater for any additional need arising from new development. Feasibility work would need to be undertaken to establish whether either of the school sites could be expanded.

[Freman College](#)

Freman College in Buntingford has a PAN of 7FE.

Freman College	PAN	2010/11 F/cast	2011/12 F/cast	2012/13 F/cast	2013/14 F/cast	2014/15 F/cast	2015/16 F/cast	2016/17 F/cast	2023/24 F/cast
Total	210	214	221	219	223	198	209	232	225

This school was full in 2010 and forecasts suggest that further places are required to meet future need.

An extension to the school site to the north may be required to enable the playing fields to be relocated in the event that part of the existing playing fields have to be redeveloped to extend Freman College in the future. This land is not in HCC ownership.

[Buntingford Civic Society](#): On the assumption that housing will be distributed along lines similar to Approaches I or II of Q23, we recommend a housing distribution based on Option D but with the addition of some of the required development being allocated to areas on the eastern side of Welwyn Garden City and Stevenage.

[Environment Agency](#): The East Herts Strategic Flood Risk Assessment should be used to inform which areas to develop. The Sequential Test should be applied when allocating sites. Areas at the lowest risk of flooding (flood zone 1) should be developed first. If a site is partially within floodzone 1 and partially in flood zone 2 or 3 then the sequential approach should be taken ensuring the highest vulnerability uses are located in the area at lowest risk of flooding.

It will be important to recognise the potential risk/benefits associated with many small/dispersed developments vs. few large developments. Cumulative impacts of development will need to be planned for to ensure environmental infrastructure is upgraded in line with development - this can more easily be overlooked when many small developments occur.

Highways Agency: Subject to further details emerging, it is the Highways Agency's initial view that Options A, B, and E could be more sustainable from a traffic generation perspective than Options C, D and F because development is concentrated around established urban centres rather than more dispersed across East Hertfordshire as suggested in the latter options in some cases to areas where access to key services, jobs and public transport is likely to be poorer.

Walkern Parish Council: Looking at the summary of proposals for the strategy it is our view that none of the options presented provide the best structure for the future development of the district. [Option A](#): it is inevitable that there will be development of these towns but it is unrealistic to rely on a plan that assumes that this is the only development possible. The same issue applies to Option E: In addition to the issues covered by option A, the extension of Stevenage towards the villages will erode the Green Belt area. The Green Belt must be maintained to allow the villages and surrounding countryside to retain the unique character that is essential for the future success of the district. The extension of Stevenage will not provide the additional housing needed within East Herts, it will only add to the size of a major town. It is also noted that Stevenage has grown beyond the resources and services available.

Welwyn Garden City

Welwyn Garden City

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy.

The second part sets out the key issues arising from the feedback from the Core Strategy Issues and Options public consultation in autumn 2010. The issues highlighted are those that relate to strategic planning issues that will be dealt with in the District Plan: Part 1 - Strategy; not site specific comments that are relevant to the District Plan: Part 2 - Allocations and Policies.

Welwyn Hatfield Documents

- Welwyn Hatfield Issues and Options Consultation Document (2010)
- Welwyn Hatfield Annual Monitoring Report (2011)
- Retail and Town Centre Needs Assessment (NLP/Welwyn Hatfield Borough Council, 2007)
- Broadwater Road West Supplementary Planning Document (SPD)
- Welwyn Hatfield Green Infrastructure Plan (Land Use Consultants, 2011)

East Herts Documents

- East Herts Green Infrastructure Plan (Land Use Consultants, 2011)

County and Regional Documents

- Regional Scale Settlement Study (Arup, 2009)
- Strategic Housing Market Assessment (ORS, 2010)
- Greater Essex Demographic Forecasts: Phase 2: Scenario Development, incorporating Phase 1: Model Development (Edge Analytics, 2012)
- Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)
- Hertfordshire London Arc Jobs, Growth and Employment Land (Roger Tym, 2009)
- Green Arc Strategic Green Infrastructure Plan – with Hertfordshire (Land Use Consultants, 2011)
- Strategic Flood Risk Assessment (2008)

Welwyn Hatfield Documents:

Welwyn Hatfield Issues and Options Consultation Document (2010)

The Issues and Options document included 13 options for future development as follows:

	Location	Estimated Potential Number of dwellings
A	North-east of Welwyn Garden City	600-1,000
B	South-east of WGC	3,400-5,000
C	North-west Hatfield	2,000-2,900
D	West of the redeveloped part of Hatfield Aerodrome	3,300-4,800
E	West of Ellenbrook & Roehyde	2,100-2,900
F	South of Hatfield	900-1,300
G	East of Welham Green	600-900
H	West and South of Brookman's Park	2,600-3,900
I	West and South-west of Cuffley	1,700 to 2,500
J	Oaklands and Mardley Heath	200 to 300
K	North of Woolmer Green	100 to 200
L	East of Little Heath	100 to 200
M	East of Digswell	100 to 200

Welwyn Hatfield Annual Monitoring Report (2011)

The Annual Monitoring Report highlights the situation at the end of 2011 regarding the district's housing targets:

- *“As reported in last year's AMR, due to the High Court Challenge to the East of England Plan which removed the regional housing target for Welwyn Hatfield and the Government's subsequent intention to abolish all regional plans, Welwyn Hatfield currently does not have an adopted housing target.”*
- *“The council are in the process of deciding on a new target for the period 2011 to 2031, however until this has been decided the AMR will report on 2 interim targets; The Welwyn Hatfield District Plan 2005 target rolled forward to 2001 to 2021– 5,600 dwellings (280 dwellings per year) and the Interim Housing Target agreed by Welwyn Hatfield Councillors in November 2010 – 5,800 dwellings between 2011 and 2031 (290 dwellings per year) Based on both of the targets mentioned above, Welwyn Hatfield currently has a 5 year housing land supply.”*

The AMR stated that 201 net additional dwellings were completed in Welwyn Hatfield during the reporting year, which is an increase from the 59 completed the previous year. However, this is still 'considerably lower than the average build rate from 2001 to 2011 of 474 dwellings per year.'

The report noted that Welwyn Hatfield has relatively high levels of deprivation compared to Hertfordshire County, particularly around Hatfield and Welwyn Garden City⁷¹. A few areas exist within the borough that are within the most deprived 20% of LSOAs in the Eastern region⁷². This includes most of Peartree ward in Welwyn Garden City. However Welwyn Garden City has comparatively lower levels of deprivation than Hatfield, further demonstrated as Hatfield Central Ward (covering the town centre) is the only LSOA in the borough that remains within the most deprived 20% of LSOAs in England.

Findings in the AMR suggest that Welwyn Hatfield is a provider of highly paid jobs, which may attract commuters from other areas of Hertfordshire and surrounding areas. Welwyn Hatfield has historically always been a provider of jobs for residents of other Districts. However, the report found the average resident wage is still higher than the workers average wage which may be a reflection of high levels of commuting to London in particular areas of the borough⁷³. In 2009, Welwyn Hatfield had a job density (that is, the number of filled jobs in an area divided by the working-age population resident in that area) of 1.03, meaning that there is more than 1 job for every working age resident. This compares to Hertfordshire which has an average job density of 0.84, The East of England at 0.76 and Great Britain at 0.78⁷⁴.

Regarding employment floorspace, an overall loss has been recorded in the borough during 2010/11⁷⁵. The report states *“most of the loss is due to the demolition of part of the Broadwater Road West Site in Welwyn Garden City, which has been counted for the first time in this year’s monitoring data as the redevelopment has commenced. There have been gains of employment floorspace at various small sites throughout the borough including the erection of a new building for B1 use at the Bio-Park in Broadwater Road.”* The majority of the overall loss of ‘town centre uses’ floorspace is attributed to the Sainsburys redevelopment in Welwyn Garden City Town Centre that involves the demolition of shops, offices and a supermarket and the erection of a replacement store. The new store is expected to be reported in the 2011/2012 AMR⁷⁶. As reported in previous AMRs, economic conditions had impacted on the delivery of the town centre regeneration and the council was investigating ways of securing further funding. The development partners are focusing on the delivery of a first phase of development in the town centre. Phase One of the scheme involves demolition of the Bill Salmon Centre and replacing it with a four storey building comprising five retail units on the ground floor and fifteen flats across three floors above.

The AMR includes a housing trajectory, a simplified version of which is shown in the table below:

⁷¹ Figure 12, page 47.

⁷² Figure 11, page 46.

⁷³ Page 50.

⁷⁴ Page 52.

⁷⁵ Page 53.

⁷⁶ Page 56.

Status	No. of Sites	Proposed Units	Units remaining (net)
Extant permission on unallocated large sites	14	749	684
Extant permission on small sites	76	150	132
Loss only	2	0	-2
Residual allocated sites	8	866	796
Contingent sites	41	1003	1003
Total		2768	2613

The AMR also details the status of Welwyn Garden City Town Centre Supplementary Planning Document (SPD):

“Urban Practitioners were appointed in 2006 to produce the SPD. Early public consultation and discussions with key stakeholders has taken place along with site analysis to identify the key issues and opportunities. This included an Action Planning Day held in September 2006. Early transportation survey and analysis highlighted the need to produce a transport model which was commissioned in May 2008. The second stage of the transport modelling work was completed in May 2010 and summarises the predicted performance of the highway network with the additional trip generation associated with the town centre retail development in future years alongside the key mitigation measures that will need to be considered.

As was previously reported the role of the SPD versus that of an Area Action Plan was under consideration. Given the need to progress with the planning and delivery of the identified development site (Town Centre North) the council decided to proceed with the SPD as originally planned. It is intended that a draft SPD will be subject to consultation early in 2012.”

Retail and Town Centre Needs Assessment (NLP, 2007):

The study was undertaken by NLP on behalf of Welwyn Hatfield Borough Council to assess the main town centres within the borough, namely Welwyn Garden City and Hatfield, as well as neighbourhood centres and to assess the future need for additional retail, commercial leisure and other town centres uses.

The Assessment studies the hierarchy of shopping centres contained within the Welwyn Hatfield District Plan, adopted in April 2005 and identifies that Welwyn Garden City is defined as a ‘Minor Sub Regional Centre’ in line with the policies in Hertfordshire Structure Plan. However, as these have not been saved, Welwyn Garden City, should be defined as a ‘Major Town Centre’ in line with the East of England Plan.

Other centres in the Borough are defined as follows:

Town Centre

Hatfield

Large Neighbourhood Centres

Haldens (Welwyn Garden City);
Hall Grove (Welwyn Garden City);
Moors Walk (Welwyn Garden City);
Woodhall (Welwyn Garden City); and
Highview (Hatfield)

Small Neighbourhood Centres

Handside (Welwyn Garden City);
Hollybush (Welwyn Garden City);
Peartree Lane (Welwyn Garden City);
Shoplands (Welwyn Garden City);
Birchwood (Hatfield);
Crawford Road (Hatfield);
Harmsfield Broadway (Hatfield);
Manor Parade (Hatfield);
Roe Green (Hatfield);
St Albans Road East (Hatfield); and
The Common (Hatfield).

Neighbourhood centres are defined as '*local centres which complement the borough and town wide role of the two main centres by providing a range of convenience shopping and service outlets to meet people's day to day needs, near to where they live so reducing the need to travel*'⁷⁷.

The study further examines the hierarchy using Table 4.1, shown below, which shows that Welwyn Garden City is ranked as the main centre in the Borough, and is 197th out of 2,212 centres across Great Britain. As the index is based on a weighted score for multiple retailers represented in each centre, Hatfield is ranked relatively low. Other village and local centres within the Borough are not included within the Venuescore Index as they are relatively small with limited or no multiple retailer provision.

⁷⁷ Page 14.

Table 4.1 Venuescore Shopping Index (2006)

Venue	Venuescore Index Score	Rank
Milton Keynes	214	34
Watford	204	40
Cambridge	166	78
Luton	141	113
Stevenage	137	124
Hemel Hempstead	133	137
St Albans	130	141
Welwyn Garden City	106	197
Bishops Stortford	88	248
Hitchin	73	312
Letchworth	56	425
Hatfield, The Galleria	49	483
Hertford	48	499
Harpenden	33	719
Stevenage, Roaring Meg R P	30	791
Potters Bar	26	906
Hatfield	24	988
Hatfield, Oldings Cnr Retail Park	15	1,528
Ware	18	1,290
Welwyn Garden City, Woodhall	12	1,818

Table 4.1 Venuescore Shopping Index, *Retail and Town Centre Needs Assessment* (2007), p. 18

Further explanation is given to the hierarchical positions of Welwyn Garden City and Hatfield town centres based on the relationship with the catchment areas of the other centres listed⁷⁸:

“Welwyn Garden City and Hatfield town centres are the main high street comparison shopping destinations in the Borough. They have a reasonable range of comparison shops including a good selection of national multiples and independent specialists. However, as indicated in Section 4, Welwyn Garden City, Hatfield Galleria and Hatfield town centre are positioned below other centres in the surrounding area based on Venuescore Shopping Index. Welwyn Garden City is ranked below Milton Keynes, Watford, Luton, Stevenage, Hemel Hempstead and St Albans. Hatfield Galleria is ranked below all these centres as well as Bishops Stortford, Hitchin and Letchworth in terms of multiple retailer representation. Hatfield town centre is ranked even lower below Hertford, Harpenden and Potters Bar. These competing centres are easily accessible to residents within Welwyn Hatfield.”

Table 7.4, shown below, gives insight into the retail yields of Welwyn Garden City, Hatfield and other retail centres which broadly reflect their respective positions in the shopping hierarchy.

⁷⁸ Page 90.

Table 7.4: Retail Yields in Welwyn Garden City and other Centres

Centre	Yield %							
	2000	2001	2002	2003	2004	2005	2006	2007
Watford	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5
St Albans	5.75	5.75	5.75	5.75	5.75	5.75	5.75	5.75
Hemel Hempstead	6.0	6.0	6.0	6.0	6.0	6.0	6.0	6.0
Stevenage	7.0	7.0	7.0	7.0	7.0	6.5	6.5	6.5
Bishops Stortford	6.5	6.5	6.5	6.5	6.5	6.5	6.5	6.5
Welwyn Garden City	7.0	7.0	7.0	7.0	7.0	7.0	7.0	7.0
Hitchin	7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5
Borehamwood	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0
Harpenden	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0
Berkhamstead	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0
Waltham Cross	8.0	8.0	8.0	8.0	8.0	8.0	8.0	8.0
Letchworth	8.5	8.5	8.5	8.5	8.5	8.5	8.5	8.5
Hertford	8.5	8.5	8.5	8.5	8.5	8.5	8.5	8.5
Hatfield	9.0	9.0	9.0	9.0	9.0	9.0	9.0	9.0

Source: Valuation Office (January 2006)

- .16 Prime retail yields within Welwyn Garden City town centre remained stable from 2000 to 2007 at 7.0%. Prime retail yields in Welwyn Garden City town centre are higher (worse) than those achieved in Bishops Stortford (6.5), Stevenage (6.5), Hemel Hempstead (6.0), St Albans (5.75) and Watford (5.5). Yields broadly reflect Welwyn Garden City town centre's position in the shopping hierarchy.

Table 7.4 Venuescore Shopping Index, *Retail and Town Centre Needs Assessment* (2007), p. 52.

The study details the history and geography of Welwyn Garden City's town centre⁷⁹ to give further context to the assessment:

"7.1 Welwyn Garden City was developed in a neo-Georgian style as part of a master plan commissioned in 1920 by Sir Ebenezer Howard. Welwyn Garden City is situated between Hatfield and Stevenage. The Howard Centre shopping mall was opened in 1990. Welwyn Garden City is identified as a 'Major Town Centre' in the draft East of England Plan and the Secretary of State's Proposed Changes to the plan.

7.2 The centre serves shoppers from Welwyn Hatfield Borough and beyond. The whole of Welwyn Garden City town centre is within a Conservation area. Welwyn Garden City is described in the adopted District Plan as the main shopping and service centre for the borough and acts as a minor sub-regional centre for Hertfordshire. In addition to retail Welwyn Garden City is the location for important civic, and community facilities.

7.3 The town centre is a non-linear centre built on a grid pattern with four main arteries, Howardsgate, Fretherne Road/Stonehills, Wigmores North and South, and Parkway. The two main supermarkets within the centre are located on the edge of the centre, with Sainsbury in the south-west corner of the centre and Waitrose located at the northernmost part of the centre, north

⁷⁹ Page 48.

of Bridge Road. Welwyn Garden City town centre is bounded by residential areas to the west and south and the railway line to the east.”

Welwyn Garden City Town Centre’s strengths and weaknesses are also identified⁸⁰ to highlight potential constraints and opportunities to accommodating future need:

“Strengths

- *Welwyn Garden City Town Centre has a good selection of shops, and a large number of multiple retailers including a John Lewis department store.*
- *The centre has a slightly higher proportion of comparison retail uses compared with the national average. The centre has two supermarkets (Sainsbury’s and Waitrose) along with a foodhall in Marks and Spencer. Food and grocery provision in the town centre is suitable for both main and top up food shopping.*
- *The town centre provides a good range of service facilities including banks and building societies. The provision of banks and other financial services is significantly higher than the national average.*
- *The vacancy rate is substantially lower than the national average which suggests demand for premises is reasonably strong.*
- *The architectural quality of buildings is very good. The historic buildings are a special feature of the centre and enhance the attraction of the town.*
- *The centre has good quality pavements, which provide a pleasant shopping environment for customers. Most areas within the centre are well maintained and clean. The provision of street furniture throughout the centre is very good.*
- *The structure of the centre does encourage shoppers to most parts of the town centre during their shopping trip.*
- *The pedestrianisation of large parts of the centre makes for a relatively safe and traffic free environment.*

Weaknesses

- *The centre does not offer the same quality and range of facilities available in Stevenage and also competes with the nearby Hatfield Galleria.*
- *There is a poor range of leisure and entertainment facilities. The centre’s evening economy is based primarily on restaurant/bars and pubs. Therefore the evening economy could be improved through diversification.*
- *There is a reasonably low supply of modern premises available to accommodate new operators in the primary area in Welwyn Garden City.*
- *There are some areas of the centre where there is vehicular/pedestrian conflict, especially in the vicinity of The Campus.”*

⁸⁰ Page 58 – 59.

Further to assessing the town centre of Welwyn Garden City, study is also given to the borough's large and small neighbourhood centres⁸¹.

"Large Neighbourhood Centres

Hall Grove is situated in the northern half of the Borough in close proximity to Woodhall and Hollybush centres. The centre comprises a purpose built parade and there are seven retail/service units including a Co-op supermarket and a pharmacy. There were no vacancies at the time of the site visit and at the time of site visit pedestrian flows in the centre were very low. Car parking is provided off Hall Grove and at the time of site visit it was almost full, however, traffic flow through the centre was low. The centre has ample bin and seating provision which is in good condition.

"Moors Walk is located in close proximity to Welwyn Garden City town centre. The centre consists of a purpose built shopping parade with covered walkways on two levels. The centre has fourteen retail/service units including a Lidl supermarket, newsagents, pharmacy and bakers. Redevelopment work is taking place at the centre to provide retail units at ground floor with residential units above on the first and second floors. In addition a new block with retail units at ground floor and residential above is being built. Pedestrian flows within Moors Walk were low at the time of site visit. Road links to the centre are good from Moors Walk. There is car parking in front of the units which at the time of site visit was about three-quarters full and road traffic through the centre was moderate. Cycle racks and bins are provided in the centre but they are of relatively poor quality.

"Woodhall is situated to the north of the borough to the south east of Welwyn Garden City town centre. The centre is a 1930's style purpose built centre with residential properties above on two floors. There are twenty-four retail/service units including a Somerfield supermarket, Barclays bank, pharmacy and bakers. Woodhall has a wide pedestrianised pathway adjacent to the shop units and this is separated from the car parking but a low steel barrier. The centre has a designated car park in front of the shops. Pedestrian flows within the centre at the time of the survey were light. The overall environment of the centre is well maintained with good provision of litter bins and seating. Paving is in a good condition albeit a bit dated.

"Small Neighbourhood Centres

Hollybush is situated in the residential area surrounding Welwyn Garden City town centre to the east of the A1(M) motorway. The centre consists of a purpose built parade with a public house at one end. Hollybush has seven retail/service units including a bakers, a Londis supermarket and a newsagent/post office. At the time of the site visit there was one vacancy within the centre. The centre was quiet in terms of pedestrian and traffic flow at the time of the site visit. The environmental condition of the centre was reasonable, however, it would benefit from being better maintained.

⁸¹ Page 72.

“Peartree is located in close proximity to Welwyn Garden City Town Centre separated by the East Coast Main Line railway. There is on-street parking available in the centre. The units are mostly purpose built within the centre and are surrounded by residential development. There are only three retail/service units in the centre, a pharmacy, One Stop shop and post office and takeaway. The centre is adjacent to a school and community centres. At the time of site visit there were no vacancies within the centre.

“Shoplads is situated to the north of the Borough north of Welwyn Garden City town centre. The centre has seven retail/service units including a Co-op convenience store and pharmacy. The retail units are in a purpose built parade which has a covered pathway along the frontage of the units. The parade is surrounded by residential development and a school. Pedestrian flows at the time of the site visit were relatively low as were traffic flows. The paving is in good condition and the centre is clean and tidy.”

The study concluded that there is a need to promote further comparison retail development within Welwyn Garden City in the long-term, and other smaller centres in the borough should be consistent in terms of scale and nature with the nearest centre and should not serve a Borough wide catchment area. Hatfield town centre should complement Welwyn Garden City town centre by providing for main convenience food shopping and a reasonable range of comparison shopping facilities. Any major comparison retail proposals outside the designated centres (town, neighbourhood and village) should be required to demonstrate there is a need for the development proposed and that the proposal will not have an unacceptable impact on existing centres. The Borough's location within the catchment area of larger centres, particularly St Albans and Stevenage, will limit the potential for development of commercial leisure and entertainment facilities.

Broadwater Road West Supplementary Planning Document (SPD)

This SPD sets out a framework to support the sustainable regeneration and redevelopment of the Broadwater Road West site; initially identified in the Welwyn Hatfield District Plan (2005) as an area of opportunity for mixed-use development. The site was once a major industrial hub, but is now largely vacant, creating a major opportunity to find a new purpose for such an extensive area (16 hectares). It has a central location in Welwyn Garden City, to the east of the railway station, therefore has potential to be a key gateway into the town centre. The town centre enjoys a low vacancy rate and is supported by the presence of the John Lewis department store and the Howard Centre.

Welwyn Hatfield Green Infrastructure Plan (Land Use Consultants, 2011)

This document details existing green infrastructure within the Welwyn Hatfield borough and identifies further opportunities for enhancement and future delivery of green infrastructure. It describes the key natural assets of the borough:

“the River Mimram, and registered Parks and Gardens including Tewin Water to the north east, the Lee Valley to the west and south, and Sherrards Park Wood and Bocket Park to the west. Panshanger Park, within East Herts District, abuts the eastern boundary of the Borough. Panshanger Park and associated mineral workings are currently being restored.”

The Plan draws attention to the chalk streams in the borough, notably the River Mimram, as well as the regionally rare wooded chalk valley landscapes, ancient woodland and wetland habitats. Project 3: River Valleys aims to conserve and enhance the wetland environment of the River Mimram and River Lee to maintain settlement settings and the sense of separation between main towns and outlying villages. Part of the vision is to enhance settlement setting and landscape edges in relation to future development, using historic landscape features as a template. Project 3 also proposes to enhance access to usable greenspace, creating cross district links with East Herts via strategic semi natural greenspace linked to ongoing restoration of Panshanger Park.

East Herts Documents:

East Herts Green Infrastructure Plan (Land Use Consultants, 2011)

The Plan provides an overview of existing green infrastructure within the East Herts district, and considers opportunities for enhancement and further creation. It identifies the ‘ongoing positive restoration taking place at Panshanger Country Park’⁸² and suggests that ‘due to the number of mineral sites and their proximity to each other (e.g. surrounding Hertford and Ware), proposals should aim to connect and improve the quality of the land, thereby enhancing the character of the landscape. This could be brought forward as part of the ongoing Panshanger Park restoration (Project 5)’⁸³. The project will be linked to conservation and enhancement of the Mimram Valley corridor and to providing strategic semi natural greenspace for East Herts and Welwyn Hatfield by creating a network of green links connecting to Hertford.

County and Regional Documents:

Regional Scale Settlement Study (Arup, 2009)

The study identified Welwyn Garden City as a ‘trend’ KCDC, which means that it should continue to grow, but would not be suitable for additional regional-scale growth of 20,000 dwellings.

Strategic Housing Market Assessment (ORS, 2010)

The study suggests that in terms of housing market areas, the strongest connections are between Welwyn Garden City and Hatfield, which are grouped together in a single housing market area, distinct from the A10 Corridor Housing Market Area. However, the study states that: “Hertford, Ware and Hoddesdon are also linked, but even the combined area is unlikely to sustain its own independence and is likely to require further amalgamation”⁸⁴.

⁸² Page 4.

⁸³ Page 21.

⁸⁴ Page 49

Greater Essex Demographic Forecasts: Phase 2: Scenario Development, incorporating Phase 1: Model Development (2012)

The projections are based on seven different scenarios. Page 44 of the study includes the projections for Welwyn Garden City to 2033 as follows:

Scenario	Household Change 2010 - 2033		Average Dwellings Per Year	20 Year Dwellings Total	Average Jobs Per Year	20 Year Jobs Total
	No.	%				
Welwyn Hatfield						
Sub-National Population Projections 2010	16,697	36.2	741	14,820	917	18,340
Nil-Net Migration	4,416	9.9	196	3,920	73	1,460
Migration-Led	20,733	46.6	920	18,400	1,287	25,740

For further explanation, please refer to the full study.

Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011)

The study did not identify any strategic employment sites in Welwyn Garden City, although it does draw attention to the BioPark in Welwyn Garden City, purchased by the University of Hertfordshire in 2006 and recently extended⁸⁵. Located nearby however, the study did identify **Hatfield Business Park**, a strategic employment site of 400 ha including landscaped grounds providing 10,000 jobs, and accessible to junctions 3 and 4 of the A1(M). The DeHavillands Campus of the University of Hertfordshire is located to the south side of the park. Key occupiers are T Mobile (HQ function), Veolia Water (offices), Eisai (pharma), Computacenter; Ocado, DHL, Booker and Royal Mail (distribution). 16 ha remains to be developed. The study identifies Hatfield Business Park as having potential for an enhanced role as a Major Business Park.

Hertfordshire London Arc Jobs, Growth and Employment Land (Roger Tym & Partners, 2009)

The study explains the historical context of employment land in Hertfordshire, particularly the Hertfordshire London Arc⁸⁶. The Hertfordshire London Arc is located north of London comprising of the boroughs and districts of Broxbourne, Dacorum, Hertsmere, St Albans, Three Rivers, Watford and Welwyn Hatfield together with Brentwood and Epping Forest in Essex. Economically, it has a strong history in the defence, aerospace and

⁸⁵ Hertfordshire Strategic Employment Sites Study (Regeneris, April 2011), page 27.

⁸⁶ Page 28.

engineering sectors and has acted as an over-spill destination for companies moving out of London. The area's economy continued to expand in the post-war period, particularly with the growth of the New Towns, attracting firms such as Smith Kline and French (a pharmaceutical company that was absorbed into GlaxoSmithKline), ICI, Hawker Siddeley, Kodak and Spirella. Like the national economy, the Hertfordshire London Arc suffered from severe structural decline in manufacturing during the 1970s but during the later 1980s it captured some of the growth in financial and businesses services and technology (mainly computer hardware and software). However the recession of the early 1990s had a major impact on the area, particularly when the continuing decline of manufacturing was exacerbated by the shrinkage of the defence and aerospace industries. Consequently the area's GDP per capita fell relative to the national average despite the rapid recovery in employment from 1993 onwards.

The study examines the industrial activity in Broxbourne that is predominantly clustered around the Waltham Cross/Cheshunt and Hoddesdon areas, and that 'the overriding theme in these concentrations of industrial stock is one of restructuring and modernisation, to provide more flexible buildings for more generic activities than the traditional industrial functions that they are replacing.' The study points to the developers for logistics operations increasingly shunning multi-let industrial estates due to the relatively cheaper costs and increased ease of providing a large shed instead, with only a single management contract. Thus occupier demand which carries an 'industrial' label has become relatively neglected⁸⁷. Welwyn Hatfield's market however is dominated by Hatfield Business Park and, to a lesser degree, by Shire Park⁸⁸. The former satisfied T-Mobile's consolidation requirement and has since attracted the inward investment of Japanese pharmaceutical business Eisai. Shire Park is also a well established business park, with a good profile of corporate occupiers.

The study assesses the suitability of sites for industrial and warehousing development and the following excerpts give further site-specific detail:

- *"The 6 Little Burrow site, also in Welwyn Garden City, is constrained by poor local infrastructure, which makes it suitable only for infill developments. It has outline planning permission for around 4,000 sq m of employment floorspace⁸⁹."*
- *"Hatfield Business Park has been very successful in attracting large, logistics activities. Commercial property agents at the consultation workshop highlighted Hatfield Business Park as a good example of mixed use development. The remaining land at the business park is identified for 34,000 sq m of employment space, together with leisure and sui generis development. The records show the site as being under construction, but we believe that this related to non-B*

⁸⁷ Page 35.

⁸⁸ Page 44.

⁸⁹ Page 71.

development, and that the employment element of the scheme has not yet started. Due to the proximity of other uses, this employment element may comprise Smart Sheds rather than Big B8⁹⁰.

- *“At North East Hoddesdon, there is planning permission for almost 75,000 sq m of warehouse use, some of which is under construction. The new development comprises a major extension to the existing good-quality industrial estate and has been made viable by the new Essex Road bridge across the railway line⁹¹.”*

The proximity to the M25 is attractive to small and medium sized enterprises, providing specialist goods and services both to local customers and to the London economy, as well as head offices and branches of larger, national and multinational companies. Though there are no inherent weaknesses in Hertfordshire’s geography, infrastructure or economy that disadvantage it, the Hertfordshire sector of the M25 office market is positioned between much stronger office markets focused on the M4 and M3 and also much weaker office markets towards the northeast and southeast sectors of the M25. This is explained in part by ‘the early competitive advantage that the M4-M3 market gained in the high technology sector, emanating from the developing defence industries’⁹² from which an established agglomeration of economic activity and area specialisation grew.

The study assesses the suitability of sites for office development and the following excerpts give further site-specific detail:

- *“Shire Park is the best office location in Welwyn Hatfield. It provides a planned environment in walking distance of the rail station and town centre and road communications on a par with the remainder of the town’s main employment area. There is an allocation of around 7,800 sq m of new floorspace for Phase 3⁹³.”*
- *“Mundells East, Welwyn Garden City is a good-quality site, located in the Welwyn Garden City Employment Area, which is well planned and has good access. It is now under construction for an 18,500 sq m data centre. An earlier permission for a large distribution centre, the Garden Shed, was not implemented⁹⁴.”*
- *“The Merck Sharp Dohme site at Hertford Road, Hoddesdon, has planning permission for 14,900 sq m of new office development. This site is assessed as average because it is not part of an established employment area and has residential surroundings⁹⁵.”*

⁹⁰ Page 71.

⁹¹ Page 72.

⁹² Page 54.

⁹³ Page 75.

⁹⁴ Page 75.

⁹⁵ Page 78.

The study concludes that while Hertfordshire London Arc's social and economic profile suggests that demand for offices should be high, given its locational advantages, key market indicators suggest otherwise. The growth of stock has been slow while demand has been low key, and very largely from existing occupiers churning space as opposed to new arrivals. Closer analysis fails to find supply-side constraints, such as lack of land or office-unfriendly planning policies, suggesting that the slow growth of office employment and floorspace in recent years has been due to weak occupier demand. As the size of the office market around the M25 is unlikely to grow at the same rate going forward as it has in the past, the Hertfordshire London Arc will need to provide new stock and a more compelling 'marketing' campaign to attract more demand and compete with other rival locations.

The study comments on the implications drawn from its analysis for the Welwyn Hatfield district:

'Welwyn Hatfield...has seen a high volume of development in recent years and still has a large land supply outstanding - mainly at Hatfield Business Park, where there are sites both for offices and industry/warehousing. Partly reflecting these factors, our suggested targets show substantial growth in the district. We also suggest Welwyn/Hatfield for a possible out-of-town business park, which would be located between Hatfield and St Albans city, so it both employs workers from Hatfield's proposed housing developments and benefits from St Albans' popularity as an office location'⁹⁶.

Green Arc Strategic Green Infrastructure Plan – with Hertfordshire (Land Use Consultants, 2011)

The Plan highlights the creation of green infrastructure and providing physical access to the water course (e.g. greenways/green corridors) and greenspace opportunities (e.g. for creation) for Welwyn Garden City and outlying communities, e.g. Digswell. It is linked to the restoration of the historic landscape of Panshanger Park post-mineral extraction and by providing settlement buffering to create a new wetland landscape character and enhance settlement setting through positive site restoration.

Strategic Flood Risk Assessment (2008)

The River Mimram flows to the north of Welwyn Garden City, and the River Lea flows to the south. Hydrological modelling has established the extent of Flood Zone 3 (High Risk), and Flood Zone 2 (Medium Risk), and Flood Zone 1 (Low Risk). To the east of the town there is over 1km of Flood Zone 1 before Flood Zone 2/3 at both rivers is reached. Topic Assessment 10: Flood Risk includes a more detailed area-specific assessment, and this has been considered in the evaluation of the East of Welwyn Garden City area of search (no. 61) set out in Section 4.2.

Issues and Options Consultation Feedback (Autumn 2010)

The Issues and Options Consultation considered the possibility of large sustainable urban extensions located to the east of Stevenage and Welwyn

⁹⁶ Page 118.

Garden City in Option E, along with development of East Herts district's towns. Therefore matters raised in the following extracts and summaries regarding Option E may not only apply to development east of Welwyn Garden City. Those which specifically mention development east of Welwyn Garden City are included however. These are responses from Question 22 which asks:

Which development strategy do you think is the most appropriate to meet the challenges facing East Herts and achieve sustainable development? Is there another option we have not considered?

Representations received from specific consultees included the following points:

Welwyn Hatfield Borough Council commented that the option to develop to the east of Welwyn Garden City had not taken into account the government's intention to revoke the East of England Plan and was premature in housing growth figures and locations of growth for Welwyn Hatfield have yet to be determined. In their response they state that development east of Welwyn Garden City should only be considered to be appropriate if:

'There is also growth within the borough of Welwyn Hatfield, to the south east of Welwyn Garden City (set out in option PG34 of the Welwyn Hatfield Core Strategy Issues and Options document) and / or north east of Welwyn Garden City (set out in option PG33 of the Welwyn Hatfield Core Strategy Issues and Options document), in order to ensure that any expansion is sustainable and provides sufficient facilities. However, regardless of this, it is important to note that there is the potential that this option may result in disjointed settlement expansion between Welwyn Hatfield and East Hertfordshire, for example, if site-specific constraints meant that development of a broad location in Welwyn Hatfield was some distance from the borough boundary, a situation could exist whereby the growth location in East Hertfordshire would develop in isolation from Welwyn Garden City and not result in a sustainable neighbourhood with easy access to facilities in Welwyn Garden City, or, for that matter, Hertford.'

Welwyn Hatfield Borough Council wish to see further work that assesses and justifies the constraints on the land and to establish the suitability of the location and scale of growth to ensure sustainable development. They acknowledged the need for further discussion with East Herts Council, should this area emerge as a preferred option.

Hertfordshire County Council, Forward Planning commented:

"Welwyn Garden City is also identified as a KCDC in the East of England Plan, but this designation does not bring with it a specific requirement for strategic housing growth of a scale to warrant inclusion within RSS."

Hertfordshire County Council, Passenger Transport Unit commented that Option E would be likely to give sufficient critical mass and be commercially

viable in terms of passenger transport provision. It was noted that development in towns under Option E will add infrastructure stress but will increase accessibility, though smarter transport choices would be essential to prevent congestion of towns roads, particularly those that would likely reach peak capacity as a result.

The Highways Agency found Option E to be more sustainable from a traffic generation perspective, thus initially preferable to others because *'development is concentrated around established urban centres rather than more dispersed across East Hertfordshire as suggested in the latter options in some cases to areas where access to key services, jobs and public transport is likely to be poorer.'*

Stanstead Abbots Parish Council identified the existing difficulties to access Welwyn Garden City by public transport from their village.

Walkern Parish Council objected to Option E due to concerns that the Green Belt would be eroded, which would risk damaging the unique character of the villages and surrounding countryside that is seen to be essential for the future success of the district.

Thames Water Property Services commented:

"For the delivery of water and wastewater infrastructure it is easier to provide the necessary infrastructure for a small number of large clearly defined sites. As such our preference for growth would be for Options A, B and E. From the sewerage infrastructure perspective Option F is not considered to be concentrated and would not be a preferred method of delivery.

Notwithstanding the above, given the constraints on Rye Meads STW (as set out in the Rye Meads Water Cycle Study) a balance would need to be struck as most of the large towns lie within the Rye Meads catchment."

RSPB commented:

"All the proposed development options (A-F) are likely to increase the pressure on water resources (which are already highly stressed). Further abstraction of water for new houses could reduce the base groundwater flow which supplies rivers upstream of Lee Valley. A reduction in river flow has the potential to affect the balance of biodiversity within the river corridors as well as reducing the quantity of water available for abstraction from river fed groundwater sources."

The Environment Agency stated that the East Herts Strategic Flood Risk Assessment should be used to determine which strategic areas to develop and commented:

"It will be important to recognise the potential risk/benefits associated with many small/dispersed developments vs few large developments. Cumulative impacts of development will need to be planned for to ensure environmental

infrastructure is upgraded in line with development - this can more easily be overlooked when many small developments occur.”

Epping Forest District Council supports Option E, due to the sustainable location that an urban extension provides with existing infrastructure already in place nearby, e.g. facilities, services and transport links.

The Buntingford Civic Society does not support Option E in its entirety, but would rather combine elements from the suggested strategies, i.e. only parts of the required development to be allocated to areas to the east of Welwyn Garden City.

Responses from individuals in support of Option E included the following comments:

- Stevenage and Welwyn Garden City are best equipped at present to cope with growth whilst East Herts is not.
- Support the idea of ‘appropriately sized’ sustainable urban extensions to Stevenage and Welwyn Garden City but in combination with another Development Strategy option to fulfil housing need. A hybrid of options would avoid ribbon coalescence and a bias towards developing in towns/villages with existing services and good transport links.
- The advantages of developing close to Welwyn Garden City are that nearby infrastructure such as services and transport links are already established.
- Easy access to existing services and the higher levels of concentration will allow the more efficient provision of new services.

Responses from individuals in objection to Option E included the following comments:

- Failure to meet the demands of rural communities.
- Development will increase existing congestion in town roads and infrastructure stress.
- Risk of ribbon development and coalescence between Welwyn Garden City and East Herts.
- Concerns over absorption of villages into expanded new towns from urban sprawl.
- Significant impact to the Green Belt.
- Development would not help East Herts residents.

New Settlements

The first part of this section provides a brief summary of key points from the documents below, which have been considered in drafting Chapters 4, 5 and 6 of the Supporting Document. Inclusion of a document in this list does not constitute the Council's acceptance of all the statements contained therein. The scope and context in which documents were commissioned and written has been taken into account where documents have been used to inform the Council's emerging strategy.

The first part of this section summarises relevant planning policy documents establishing the need to consider new settlements as a reasonable alternative approach to development.

The second part of this section lists research documents that have been read to inform our understanding of the advantages and disadvantages of new settlements and guidance on their construction. They have therefore not been summarised as they were simply informative rather than specific.

Policy Documents

Draft Planning Policy Statement: Eco-Towns - Consultation (CLG, 2008)

National Planning Policy Framework (CLG, 2012)

Prime Minister's speech on infrastructure: Prime Minister's speech on national infrastructure was delivered at the Institute of Civil Engineering. (19 March 2012)

Regional Scale Settlement Study (Arup, 2009)

Research Documents:

Best Practice in Urban Extensions and New Settlements (TCPA, 2007)

Creating Garden Cities and Suburbs Today: Policies, Practices, Partnerships and Model Approaches – A Report of the Garden Cities and Suburbs Expert Group (TCPA, 2012)

Garden Towns, Villages and Suburbs: A prospectus for Warwick District Council (May 2012)

Lessons From Cambourne (S. Platt, Cambridge Architectural Research and Inspire East, 2007)

Nothing Gained By Overcrowding: A Centenary Celebration and Re-exploration of Raymond Unwin's Pamphlet (TCPA, 2012)

Re-imagining Garden Cities for the 21st Century: Benefits and Lessons in Bringing forward Comprehensively Planned New Communities (TCPA, 2011)

What makes an eco-town? A report from BioRegional and CABE inspired by the eco-towns challenge panel (Bio-Regional and CABE, 2008)

Town & Country Planning Tomorrow Series Paper 12: Heathrow Garden City (TCPA and Graeme Bell, 2012)

Policy Documents:

Draft Planning Policy Statement: Eco-Towns - Consultation (CLG, 2008)

The majority of housing growth has always been in our towns and cities and this will continue, with a focus on brownfield land, as set out in PPS3. However, where the need and demand for housing is high, PPS3 advises that it is necessary to identify and explore a range of options for distributing housing, including new settlements. New settlements are not a new idea; the new towns and garden cities were a successful response to the housing crisis in the post war years.

A key characteristic of an eco-town is that it must be a new settlement, separate and distinct, but well linked to higher order centres. Eco-towns should be of sufficient size and have the necessary services to establish their own character and identity and so have the critical mass necessary to deliver much higher standards of sustainability. Eco-towns should make provision for a minimum of 5,000 homes. Planning on this scale allows the development to exploit a number of opportunities and benefits. Ecotowns can:

- (a) relieve pressure for development in urban areas and particularly in relation to their green spaces and public services
- (b) provide a good quantity of green space of the highest quality through their proximity to the natural environment
- (c) offer opportunities for space within and around the dwellings (particularly important for families with children)
- (d) promote healthy and sustainable environments through 'Active Design' principles and healthy living choices
- (e) offer opportunities for infrastructure that make best use of technologies in energy generation and conservation in ways that are not always practical or economic in other developments
- (f) use the opportunity to plan and deliver a locally appropriate mix of housing type and tenure to meet the needs of all income groups and household size, and
- (g) take advantage of significant economies of scale and increases in land value to deliver new technology and infrastructure such as for transport, energy and community facilities.

National Planning Policy Framework (CLG, 2012)

Paragraph 52: The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or

extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.

Paragraph 82: The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.

Prime Minister's speech on infrastructure: Prime Minister's speech on national infrastructure was delivered at the Institute of Civil Engineering. (19 March 2012)

"This is the challenge. The growth of our towns and cities has been held back by a planning system that has encouraged development of the wrong sort in the wrong places. We need homes for people who need them in the places they want them while protecting our fine landscapes and preserving the green belt.

Now, it seems to me that our post-war predecessors had the right idea, embodied in the visionary plan prepared by Patrick Abercrombie in 1944. His plan underpinned the Southeast's economic success by proposing well planned and well located new towns, which would in time become new engines of economic growth. And he twinned that vision with proposals for a new London green belt to prevent sprawl.

Now, while everyone celebrates the success of the green belt, far fewer people celebrate the contribution that the new towns made to maintaining it intact. Some people feel we've lost the art of creating great places with the right social and environmental infrastructure. Now, certainly mistakes were made in the new towns with the state deciding, often rather arrogantly, what people ought to like and what they should not like. But in the last century private and social enterprises also created places like Hampstead Garden Suburb, Letchworth, Welwyn Garden City, not perfect, but popular, green, planned, secure with gardens, places to play and character-full houses, not just car dominated concrete grids.

So, yes, we need more housing, but sprawling over the countryside isn't the answer. We must absolutely protect our green belts and national parks, but we also urgently need to find places where we're prepared to allow significant new growth to happen. That is why we'll begin consultation later this year on how to apply the principles of garden cities to areas with high potential growth in places people want to live. And we must get our planning system fit for purpose; it needs to be quick, it needs to be easier to use and it needs to better support growth, jobs and homes."

Regional Scale Settlement Study (Arup, 2009)

The study details some of the constraints facing the many towns and villages across the entire East of England Region, breaking the Region down into complimentary areas. As such, Hertfordshire is considered alongside Essex, Thurrock and Southend-on-Sea. Our closest partners in respect of this study is Essex due to the shared common factors such as being part of the London Arc, a location heavily dependant upon London. Despite several Hertfordshire centres being identified as Key centres for Development and Change, there are a large number of smaller towns and villages scattered across the County. The Study acknowledges that none of these settlements are truly self-contained, thus there are high levels of interaction between them for employment, leisure and shopping among others. The Study identifies the advantages and disadvantages of being in proximity to London and also with the presence of Stansted Airport, such as employment opportunities from complimentary businesses, countered by congestion and out-commuting.

The Study cites some of the history of Hertfordshire in terms of delivering regional scale settlements, primarily in the form of new settlements. The first Garden Cities (Letchworth and Welwyn) and four of the first generation New Towns (Stevenage, Hemel Hempstead, Hatfield and Welwyn) were developed with the County. More recently larger scale growth has been focused on expanding existing areas, such as Stevenage. The most recent growth strategy for Hertfordshire sought to maintain the existing settlement pattern of small and medium sized towns. Thus the focus for growth was the larger urban areas, i.e. those with a population of more than 7,000 (Hertfordshire County Council, 2008). This strategy was reinforced in the RSS, which identifies Key Centres for Change and Development, i.e. Hatfield and Welwyn Garden City, Hemel Hempstead, Stevenage and Watford in Hertfordshire, as the main foci for growth.

For the purposes of the Study, the minimum growth required to support a regional scale settlement has been defined as 20,000+ dwellings equivalent to a population of around 40,000 and a jobs provision of 18,400 in order to develop a balanced community. Employment growth is particularly key in the selection of potential locations. The Study argues that given Hertfordshire's and the Essex sub-region's location within the London Arc engine of growth and the significant proportion of their residents that commute to London, that a lower proportion of employment growth (i.e. less than 18,400) may be sufficient to justify a regional scale settlement.

Although a balance of jobs and homes is necessary to create a sustainable community, supporting the economy of London may be a sufficient objective to create a more 'dormitory' style settlement if commuting by sustainable modes of transport is possible. The key questions to be considered when developing a growth strategy are thus, are 'dormitory' style settlements appropriate in these circumstances, what levels of commuting vs. jobs-homes self sufficiency are acceptable, and is there or could there be capacity on public transport, particular on the rail lines to London, to support commuting by sustainable travel modes?

As the Study was prepared in response to the RSS, it uses the population projections used in the Regional Plan. The projections for Hertfordshire and the Essex sub-region suggested that the overall residential population could grow by around 179,000 and 157,000 respectively between 2021 and 2031, i.e. in addition to the growth already anticipated in the RSS; while employment was expected to grow by 107,000 in Hertfordshire and 77,000 in the Essex sub-region over the same period. The projections suggest that Hertfordshire and the Essex sub-region overall have sufficient anticipated population and employment growth to support a regional scale settlement. However, individually none of the local authorities are projected to have sufficient growth in population and employment to justify a regional scale settlement. That said, a regional scale settlement would not necessarily be neatly located within any single district and by its very nature may serve to meet demand from wider adjoining areas. Thus if a regional scale settlement for Hertfordshire and the Essex sub-region is identified as an appropriate growth strategy, it would be necessary to redirect growth through policy and delivery mechanisms. However, these projections would need to be revised in response to the revocation of the Regional Plan.

The presence of Stansted Airport brings many benefits in terms of airport related industries and related employment opportunities. Changes to flight destinations to cover more European cities and the possibility of a second runway may increase the importance of the airport. The Cushman Wakefield European Monitor 2007 states that the main factor in business locational decisions was availability of qualified staff with the fourth most important being transport links with other cities and internationally. In addition, the airport itself employs a range of staff across all occupations with concentrations in both high-skilled and relatively low skilled jobs. The area around Stansted airport would therefore seem to provide good conditions for the relocation of business to support an increasing population. It may be that these changes to the airport may provide sufficient justification for a regional scale settlement. The key criteria that a location must meet, if it is to accommodate a regional scale settlement to fulfil this function, is thus relatively close physical proximity to the airport and strategic road/rail link to the airport.

The Study indicates that Hertfordshire is highly constrained (in development terms) with around two thirds of the area covered by environmental or planning designations e.g. AONB or Greenbelt. Only East Herts has a significant proportion of 'white land', i.e. not covered by environmental or physical attributes or designations that may limit potential for development. The RSS identified a need to review the Hertfordshire Greenbelt boundaries in order to meet regional development needs. Particular locations suggested for review include Stevenage (Stevenage and North Hertfordshire Districts), Hemel Hempstead (Dacorum and St Albans Districts), Welwyn Hatfield (Welwyn Hatfield and St Albans Districts) and at a more localised level, Broxbourne. The RSS recommend a review of Green Belt boundaries around Harlow and its two surrounding districts, i.e. East Herts and Epping Forest.

Being located on the national motorway network (M11 and M25) and having good rail connections to London, Harlow has excellent strategic and locational advantages in terms of attracting new development. The London to Stansted corridor has been identified as a regional transport investment priority, improvements to which should open up new capacity and opportunities for development by further improving connections to the key regional economic drivers of London, Stansted and Cambridge.

Despite its designation as a major regional housing growth point, population and jobs growth beyond 2021 is however low. Projected growth in the adjoining districts of Broxbourne, East Hertfordshire and Epping Forest is far more buoyant, and there may be opportunities to divert some of this growth to Harlow, if the decision is taken to pursue a regional scale settlement in this location. However, given the scale of existing planned growth in this area for the period up to 2021, it seems unlikely that additional significant growth could be accommodated post 2021.

The Study suggests that from a locational and transport connections perspective, Bishop's Stortford in East Herts appears to be a logical location for growth. However, on examination of the particular circumstances for this settlement, it is clear that it could not accommodate growth of 20,000+ dwellings. Bishop's Stortford is a market town surrounded by Greenbelt, which would need to be reviewed if development was to occur here and sections of the landscape are absolutely constrained by electricity transmission lines. Furthermore it appears near to its natural capacity given the boundaries set by the M11 and A120. These physical and environmental constraints combined with transport and infrastructure capacity constraints suggest that Bishop's Stortford is not a suitable location for a regional scale settlement.