

Appendix 1 - Proposed Response to East Herts Core Strategy Issues & Options consultation document

The consultation questions are presented in 10 sections, relating to the chapters of the document. Those which could potentially affect Epping Forest District the most are starred** below:

Background and Context (General Questions & 9 Themes)	Q1 and 2
Key Issues and Vision (First part, LDF Vision)	Q3 to 21 **
Development Strategy (Second part,, LDF Vision)	Q22 and 23 **
Bishop's Stortford	Q24 to 26
Buntingford	Q27 to 29
Hertford	Q30 to 32
Sawbridgeworth	Q33 to 35 **
Ware	Q36 to 38
Villages	Q39 to 42 **
North of Harlow	Q43 **

General questions

Q1. Sustainability Appraisal

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

Yes / No

The Sustainability Appraisal appears, in general, to be detailed, and to assess the appropriate topics. Obviously it is expected that appraisal of the development options would become more detailed in further stages of the Core Strategy.

This Council is however concerned that the 'Summary of likely significant effects of the development strategy options' highlights likely severe additional stress on water resources in the local area, especially on the River Stort, and significant impacts on road and passenger rail capacity. It does not appear that significant mitigation measures have been identified.

Q2. Habitats Regulations Assessment

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

Yes / No

The habitats Regulation Assessment appears, in general, to be detailed, and to assess the appropriate topics.

This Council is pleased to note that existing problems regarding the high level of NOx in and around the Epping Forest Special Area of Conservation have been recognised, particularly the fact that much of this is a result of road traffic. It is therefore assumed that this issue, and the potential impacts of increased traffic caused by large scale development in and around Harlow, will be carefully considered in future iterations of the Core Strategy.

However, this Council is concerned to note that in Table 9 – Development to north of Harlow, it is stated that ‘Impacts on the three European sites considered within the scope of this HRA are unlikely to be more affected by one of the five spatial options over any of the others’. Surely it is more likely that large scale development in Epping Forest District is more likely to affect the Epping Forest SAC, as the development will be physically closer to the SAC than say, if it were located to the north of Harlow. We are concerned that this issue has not been investigated sufficiently.

Theme 1: East Herts Energy and Climate Change

Q3. Theme 1: LDF Strategic Objectives

Have we got the LDF strategic objectives for Theme 1 correct?

Correct / Incorrect / **Partly Correct**

Yes, these seem appropriate, but could be more explicit in encouraging renewable energy generation.

Q4. Theme 1: Policy Options

Is our approach to dealing with the policy options for Theme 1 correct?

Correct / Incorrect / Partly Correct

This seems appropriate.

Theme 2: East Herts People and Community Safety

Q5. Theme 2: LDF Strategic Objectives	Have we got the LDF strategic objectives for Theme 2 correct?	Correct / Incorrect / Partly Correct	Yes, these seem appropriate.
Q6. Theme 2: Policy Options	Is our approach to dealing with the policy options for Theme 2 correct?	Correct / Incorrect / Partly Correct	This seems appropriate.

Theme 3: Housing East Herts

Q7. Theme 3: Housing East Herts	Have we got the LDF strategic objectives for Theme 3 correct?	Correct / Incorrect / Partly Correct	The more general objectives seem appropriate, but HOU2, relating to the now-revoked East of England Plan, should be removed, and replaced by an evidence-led local target.
Q8. Theme 3: Policy Options	Is our approach to dealing with the policy options for Theme 3 correct?	Correct / Incorrect / Partly Correct	This seems appropriate.

Theme 4: East Herts Character

Question 9. Theme 4: LDF Strategic Objectives	Have we got the LDF strategic objectives for Theme 4 correct?	Correct / Incorrect / Partly Correct	Yes, these seem appropriate.
Question 10. Theme 4: Policy Options	Is our approach to dealing with the policy options for Theme 4 correct?	Correct / Incorrect / Partly Correct	This seems appropriate.

Theme 5: East Herts Economy, Skills and Prosperity

Question 11. Theme 5: LDF Strategic Objectives	Have we got the LDF strategic objectives for Theme 5 correct?	Correct / Incorrect / Partly Correct	Yes, these seem appropriate.
Question 12. Theme 5: Policy Options	Is our approach to dealing with the policy options for Theme 5 correct?	Correct / Incorrect / Partly Correct	This seems appropriate.

Theme 6: East Herts On the Move

Question 13. Theme 6: LDF Strategic Objectives	Have we got the LDF strategic objectives for Theme 6 correct?	Correct / Incorrect / Partly Correct	Yes, these seem appropriate.
Question 14. Theme 6: Policy Options	Is our approach to dealing with the policy options for Theme 6 correct?	Correct / Incorrect / Partly Correct	This seems appropriate.

Theme 7: East Herts Health, Wellbeing and Play

Question 15. Theme 7: LDF Strategic Objectives	Have we got the LDF strategic objectives for Theme 7 correct?	Correct / Incorrect / Partly Correct	Yes, these seem appropriate.
Question 16. Theme 7: Policy Options	Is our approach to dealing with the policy options for Theme 7 correct?	Correct / Incorrect / Partly Correct	This seems appropriate.

Theme 8: Green East Herts

Question 17. Theme 8: LDF Strategic Objectives	Have we got the LDF strategic objectives for Theme 8 correct?	Correct / Incorrect / Partly Correct	In general these seem appropriate, however, it is suggested that an additional objective GRE5 be added, 'To safeguard existing nationally and internationally important habitats and areas of biodiversity (SACs, SPAs and SSSIs) from negative impacts associated with development'.
Question 18. Theme 8: Policy Options	Is our approach to dealing with the policy options for Theme 8 correct?	Correct / Incorrect / Partly Correct	This seems appropriate.

Theme 9: East Herts Monitoring and Delivery

Question 19. Theme 9: LDF Strategic Objectives	Have we got the LDF strategic objectives for Theme 9 correct?	Correct / Incorrect / Partly Correct	Yes, these seem appropriate.
Question 20. Theme 9: Policy Options	Is our approach to dealing with the policy options for Theme 9 correct?	Correct / Incorrect / Partly Correct	This seems appropriate.

East Herts LDF Vision

Question 21. LDF Vision

Is our emerging LDF vision for what East Herts will be like in 2031 correct?

Correct /
Incorrect /
Partly Correct

Yes this seems to cover all the pertinent issues.

Question 22. Broad Locations for Growth

Which development strategy do you think is the most appropriate to meet the challenges facing East Herts and achieve sustainable development?

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

Please rank in order of preference.

Is there another option we have not considered?

	Development Strategy Options					
	A	B	C	D	E	F
Preference 1					✓	
Preference 2	✓					
Preference 3		✓				
Preference 4			✓			
Preference 5						✓
Preference 6				✓		

It is noted that the targets this section are predicated on were in the now-revoked East of England Plan, and it is assumed that appropriate amendments will be made before the next iteration of the Core Strategy.

The 'land-take' diagrams are thought to be very helpful in visually demonstrating the effect of using different densities.

Options E and A are preferred, as these concentrate growth to existing urban areas, and extensions to existing towns, thereby locating development in a sustainable location, with facilities, services and transport links nearby.

Options B and C are less preferred, as these would result in a more dispersed pattern, locating development in many places where local services and transport would be insufficient or even non-existent. Option F is seen as unsustainable, as although concentrated along transport links, many of the settlements would be too small to have the services required to support development. Option D is the least favoured, as it is even more dispersed than option F, and with lower accessibility.

Question 23.
Approaches to
Housing Distribution

Which housing distribution approach to you think is the most appropriate to meet the challenges facing East Herts and achieve sustainable development?

Approach I: Proportional Distribution

Approach II: Adjusted Proportional Distribution

Approach III: Reversed Proportional Distribution

Approach IV: Equal Distribution

Approach V: Distribution by Land Availability

Approach VI: Distribution by Settlement Type

Please rank in order of preference.

Is there another approach we have not considered?

	Approaches					
	I	II	III	IV	V	VI
Preference 1	✓					
Preference 2		✓				
Preference 3						✓
Preference 4					✓	
Preference 5				✓		
Preference 6			✓			

Options I and II are preferred, as these allocate growth to settlements based on their existing size, thus concentrating development near existing services and infrastructure, which is sustainable.

Option VI is fairly reasonable, as it allocated growth on the basis of the category of settlement. This categorisation takes into account existing size and infrastructure, and would be a more sustainable approach.

Option V does not seem sensible, as this will allocate land purely where it is available, based on a call for sites exercise. This exercise, while useful, does not provide the definitive record of real land availability, and may well suggest areas of land which are very unsuitable.

Option IV is not favoured, as it allocates equal growth to each settlement, regardless of that settlement's infrastructure or services, or its ability to support growth, this is unsustainable.

Option III is the least favoured, as it allocates the most housing to the smallest settlements and vice versa, despite the fact that this will allocate growth where there is insufficient infrastructure and services, and it will not make use of the existing infrastructure and services within larger urban areas.

Bishop's Stortford

Question 24. Growth Options for Bishop's Stortford

Please rank the growth options for Bishop's Stortford in order of preference.

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

Please comment on the suitability of these options. Is there another approach we have not considered?

	Growth Options				
	1	2	3	4	5
Preference 1					
Preference 2					
Preference 3					
Preference 4					
Preference 5					

No response proposed – this settlement is too far from Epping Forest District's boundaries to have any significant effect, no matter which option is chosen.

Question 25. Approach to Development in Bishop's Stortford

Please rank the approaches to development in Bishop's Stortford in order of preference.

- Option 1: Lower density - therefore higher land-take
- Option 2: Medium density - therefore medium land-take
- Option 3: Higher density - therefore lower land-take

Is there another approach we have not considered?

	Development Strategy Options		
	1 Lower Density	2 Medium Density	3 Higher Density
Preference 1			
Preference 2			
Preference 3			

No response proposed – this settlement is too far from Epping Forest District's boundaries to have any significant effect, no matter which option is chosen.

Question 26. Bishop's Stortford Vision

Do you agree with the emerging LDF vision for Bishop's Stortford?

Agree / Disagree / Partly agree

No response proposed – this settlement is too far from Epping Forest District's boundaries to have any significant effect.

Buntingford

Question 27. Growth Options for Buntingford

Please rank the growth options for Buntingford in order of preference.

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

Please comment on the suitability of these options. Is there another approach we have not considered?

	Growth Options				
	1	2	3	4	5
Preference 1					
Preference 2					
Preference 3					
Preference 4					
Preference 5					

No response proposed – this settlement is too far from Epping Forest District’s boundaries to have any significant effect, no matter which option is chosen.

Question 28. Approaches to Development in Buntingford

Please rank the approaches to development in Buntingford in order of preference.

- Option 1: Lower density - therefore higher land-take
- Option 2: Medium density - therefore medium land-take
- Option 3: Higher density - therefore lower land-take

Is there another approach we have not considered?

	Development Strategy Options		
	1 Lower Density	2 Medium Density	3 Higher Density
Preference 1			
Preference 2			
Preference 3			

No response proposed – this settlement is too far from Epping Forest District’s boundaries to have any significant effect, no matter which option is chosen.

Question 29. Buntingford Vision

Do you agree with the emerging LDF vision for Buntingford?

Agree / Disagree / Partly agree

No response proposed – this settlement is too far from Epping Forest District’s boundaries to have any significant effect.

Hertford

Question 30. Growth Options for Hertford

Please rank the growth options for Hertford in order of preference:

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

Please comment on the suitability of these options. Is there another approach we have not considered?

	Growth Options			
	1	2	3	4
Preference 1				
Preference 2				
Preference 3				
Preference 4				

No response proposed – this settlement is too far from Epping Forest District’s boundaries to have any significant effect, no matter which option is chosen.

Question 31. Approach to Development in Hertford

Please rank the approaches to development in Hertford in order of preference.

- Option 1: Lower density - therefore higher land-take
- Option 2: Medium density - therefore medium land-take
- Option 3: Higher density - therefore lower land-take

Is there another approach we have not considered?

	Development Strategy Options		
	1 Lower Density	2 Medium Density	3 Higher Density
Preference 1			
Preference 2			
Preference 3			

No response proposed – this settlement is too far from Epping Forest District’s boundaries to have any significant effect, no matter which option is chosen.

Question 32. Hertford Vision

Do you agree with the emerging LDF Vision for Hertford?

Agree / Disagree / Partly agree

No response proposed – this settlement is too far from Epping Forest District’s boundaries to have any significant effect.

Sawbridgeworth

Question 33. Growth Options for Sawbridgeworth

Please rank the growth options for Sawbridgeworth in order of preference.

- Option 1: Within the Existing Built-up Area
- Option 2: To the Southwest
- Option 3: To the West
- Option 4: To the North

Please comment on the suitability of these options. Is there another approach we have not considered?

	Growth Options			
	1	2	3	4
Preference 1			✓	
Preference 2		✓		
Preference 3				✓
Preference 4	✓			

Option 3 is preferred, as this directs development towards an area near to services, and where land has been identified as available. Option 2 would also benefit from nearby services.

Option 4 is not favoured as it is removed from services. Option 1 is the least favoured as no land has been found available, and the town centre is already congested. Options 4 and 1 are likely also to put increased strain on services and infrastructure in Lower Sheering, which is just the other side of the District/County border.

Question 34. Approach to Development in Sawbridgeworth

Please rank the approaches to development in Sawbridgeworth in order of preference:

- Option 1: Lower density - therefore higher land-take
- Option 2: Medium density - therefore medium land-take
- Option 3: Higher density - therefore lower land-take

Is there another approach we have not considered?

	Development Strategy Options		
	1 Lower Density	2 Medium Density	3 Higher Density
Preference 1			✓
Preference 2		✓	
Preference 3	✓		

A higher density is 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.

Question 35. Sawbridgeworth Vision

Do you agree with the emerging LDF vision for Sawbridgeworth?

Agree / Disagree / Partly agree

This seems appropriate.

Ware

Question 36. Growth Options for Ware

Please rank the growth options for Ware in order of preference:

Option 1: Town Centre/Existing Urban Area

Option 2: To the North

Option 3: To the East

Option 4: To the Southeast

Option 5: To the Southwest

Please comment on the suitability of these options. Is there another approach we have not considered?

	Growth Options				
	1	2	3	4	5
Preference 1		✓			
Preference 2			✓		
Preference 3	✓				
Preference 4				✓	
Preference 5					✓

Options 2 and 3 are preferred as these are on land near to existing services, where land is available for development, and where transport links are nearby.

Option 1 would be a sustainable location, but it seems that little land is available.

Options 4 and 5 are the least favoured, as these are in a flood plain, could cause coalescence, and could also place increased strain on services and infrastructure in the village of Roydon, which is nearby to the south west.

Question 37. Approaches to development in Ware

Please rank the approaches to development in Ware in order of preference:

Option 1: Lower density - therefore higher land-take

Option 2: Medium density - therefore medium land-take

Option 3: Higher density - therefore lower land-take

Is there another approach we have not considered?

	Development Strategy Options		
	1 Lower Density	2 Medium Density	3 Higher Density
Preference 1			✓
Preference 2		✓	
Preference 3	✓		

A higher density is 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.

Question 38. Ware Vision

Do you agree with the emerging LDF vision for Ware?

Agree / Disagree / Partly agree

This seems appropriate.

Villages

Question 39. Approach to Development in the Villages

Please rank the approaches to development in the villages in order of preference:

Option 1: Lower density - therefore higher land-take

Option 2: Medium density - therefore medium land-take

Option 3: Higher density - therefore lower land-take

Is there another approach we have not considered?

	Approach to Development Options		
	1 Lower Density	2 Medium Density	3 Higher Density
Preference 1			✓
Preference 2		✓	
Preference 3	✓		

A higher density is preferred for new development, in order to effectively concentrate homes near services, and to minimise take up of Greenfield / Green Belt land. It would also make use of the available land in the most efficient way. It has been shown that higher density does not have to mean a less pleasant living environment.

Question 40. Identifying Types of Villages

Is our approach to identifying three types of village (Larger Service Villages/Smaller Service Villages and Other Villages / Hamlets) correct?

Correct / Incorrect / Partly Correct

This seems reasonable, as those larger settlements, with more facilities, have been classified as such.

Question 41. Village Identification

Have we identified the correct villages under each village type?

What changes (if any) would you make?

	Yes	No
Larger Service Villages	✓	
Smaller Service Villages	✓	
Other Villages/Hamlets		

The identification of Larger and Smaller Service Villages seems reasonable. However, this Council cannot comment on 'Other Villages/Hamlets' as these have not yet been listed.

Question 42. An Emerging Vision for the Villages

Subject to whichever development strategy with our emerging vision for the villages?

Agree / Disagree / Partly agree

The visions for each scenario seem to fit the development strategies proposed.

North of Harlow

Question 43. Consultants Suggested Approach

Do you agree with the consultants' Suggested Approach in respect of growth to the north of Harlow?

Agree / **Disagree** /
Partly agree

The Consultants Suggested Approach should be reviewed given the revocation of the East of England Plan, and the policy HA1 therein.

If not, how would you distribute development in accordance with Policy HA1 of the East of England Plan and why?

Given the revocation of the East of England Plan, there may be a case to revisit the issue of the growth of Harlow, including reviewing the evidence in the Harlow Options Appraisal. There is still scope at this point for coordinated working between the three local planning authorities involved, through senior management/Member discussions on the future direction of travel.

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 the East Herts district wide housing requirement?

Yes / No

Again, as the East of England Plan has been revoked, this issue would need to be revisited. It is not possible to comment further at this time.