



# Stanstead Abbotts St Margarets

## Neighbourhood Plan Community Consultation Statement 2023-4

### Stanstead Abbotts & St Margarets



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Stanstead Abbotts & St Margarets NP





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## 1 . Introduction

- 1.1. This statement has been prepared to append the draft version of the Stanstead Abbots, St Margarets and the Folly Neighbourhood Plan (SASMNP) for submission to the relevant local planning authority, East Herts District Council (EHDC), under the Neighbourhood Planning regulations 2012 (“the regulations”).
- 1.2. A consultation statement is a statutory document of the Neighbourhood Planning process. The Regulations of 2012, Part 5 paragraph 15 (2) define a “Consultation Statement” as a document that:
  - a. Details of the persons and bodies who were consulted about the proposed Neighbourhood Plan (NP);
  - b. Explains how they were consulted;
  - c. Summarises the main issues and concerns raised by the persons consulted; and,
  - d. Describes how these issues and concerns have been considered and, where relevant, addressed in the NP.
- 1.3. The consultation process was necessary in order to:
  - a. Publicise and explain the Neighbourhood Planning Process to the community; and
  - b. Seek the opinion of the community on possible enhancements to the area and feedback on the proposed objectives and policies of the Plan.
  - c. Engage the interest of residents and to offer anyone the opportunity to join the Steering Group.
- 1.4. This report provides an overview of the different community engagement events and communication channels used to enable residents/businesses to understand the neighbourhood planning process and feed in their thoughts and ideas ahead of the NP being developed.
- 1.5. A range of events and channels for engagement were used, including a school visit, paper and online surveys for individuals/households and businesses, open days and social media.

The web page is: <https://www.stansteadabbottsneighbourhoodplan.uk/>

The Facebook page is:

<https://www.facebook.com/groups/392525967789735>





Agendas and Minutes of the Steering Group meetings have been posted on both of these webpages.

- 1.6. Face-to-face events were replicated across the three parishes included in the NP designated area to ensure that all communities engage easily.
- 1.7. Each channel of engagement was structured around six key themes:
  - Housing
  - Heritage
  - Natural environment
  - Business and employment
  - Community, leisure and recreation
  - Transport
- 1.8. All Events and Channels of engagement were designed to achieve the following objectives.
  - a. Communicate why a Neighbourhood Plan was needed and the process for developing the Plan;
  - b. Gather feedback from the community on the following:
    - c. What they value about the environment and space they live in;
    - d. What they want to protect and enhance;
    - e. What they are worried about;
    - f. What types of housing they thought were needed;
    - g. Where they thought new developments could be located;
    - h. What other amenities should be included in new developments.
  - i. Provide people with an opportunity to sign up to be part of the steering group and associated sub-groups (sub-groups: housing; natural environment; heritage; transport; community; businesses; and communications and engagement)

## **2 . Summary of findings**

- 2.1. In the first stage of the Stanstead Abbots and St Margarets Neighbourhood Plan (SASMNP) consultation the SG held various events which demonstrated the strong attachment residents feel to their village.



There was much consensus about the need for affordable housing and great reluctance to build in the green belt. There are employment opportunities and prosperity in the village with a number of local employers being second generation. There are also many commuters using St Margarets Station for an easy route to London.

- 2.2. All consultation on the Stanstead Abbots and St Margarets NP was, of course, disrupted by Covid 19. The informal consultation planned for March 2020 was initially postponed and was eventually cancelled. Further work continued in each of six principle themes by sub-groups of the SG. AECOM – planning experts employed by Locality (Government organisation set up to support Neighbourhood Planning) wrote reports on Housing and Design while there was also further investigation by Intelligent Planning who fed back to Stanstead Abbots Parish Council (SAPC). This third report advised going for Regulation 14 Consultation as soon as possible. Once the SEA had been prepared by AECOM at the request of East Herts District Council (EHDC) it was possible to get the formal consultation started.

### **3 . Background Research and Planning**

- 3.1. Stanstead Abbots and St Margarets were treated as one Group One village by the EHDC District Plan which meant there would need to be a 10% increase in housing during the planning period 2016-2033. EHDC informed the Chairman of Stanstead Abbots Parish Council that they should begin work on a NP.
- 3.2. SAPC was advised in September 2016 to begin work on a Neighbourhood Plan. An initial meeting was held on November 25th 2016 in the Parish Hall to publicise SAPC'S intention to begin a Neighbourhood Plan. It was advertised in the Parish Magazine and on Facebook. (At the time the Parish Magazine was distributed to homes in all three parishes). The meeting attracted a number of interested residents who signed up to help. See appendix 1 which is a feedback form from the first awareness-raising meeting held in the Stanstead Abbots Parish Hall and also appendix 2 a report of the meeting published in the Parish Magazine.
- 3.3. Subsequently informal survey forms were used as hand-outs for a street stall held on a Saturday morning. Afterwards they were placed in shops for people to help themselves then return them to a newsagent when they had completed them (appendices 2 and 3).



- 3.4. At the annual Parish Meeting on May 11th, the Chairman of the Neighbourhood Planning Steering Group in Much Hadham, Ian Hunt, outlined the procedure for getting going with a NP. This meeting was followed by an informal survey – see Appendices 3 and 4. Responses were processed – see Appendix 5 - the main aim had been to raise awareness of the NP.
- 3.5. Two meetings were held on Saturday afternoons in the Village Café. Then on June 21st 2017, the Steering Group was set up and held its inaugural meeting in the café at French and Jupps in the Maltings, Roydon Road, Stanstead Abbots.

At this meeting Julia Davies (JD) was elected as Chair, Leah Pybus (LP) as Secretary and Robert Bennet (RB) as Treasurer.

The appointment of Jacqueline Veater (JV) as Consultant was approved.

Minutes were produced and posted on the website.

- 3.6. It was agreed that meetings should be held in different parts of the NP area and the following meeting was held in the Nigel Copping Hall in St Margarets, at which JV ran a workshop style meeting to further motivate the newly formed Steering Group.
- 3.7. As part of the branding for easy recognition this logo was designed by a member of the SG to demonstrate the importance of the river and wildlife to the area covered by this NP.

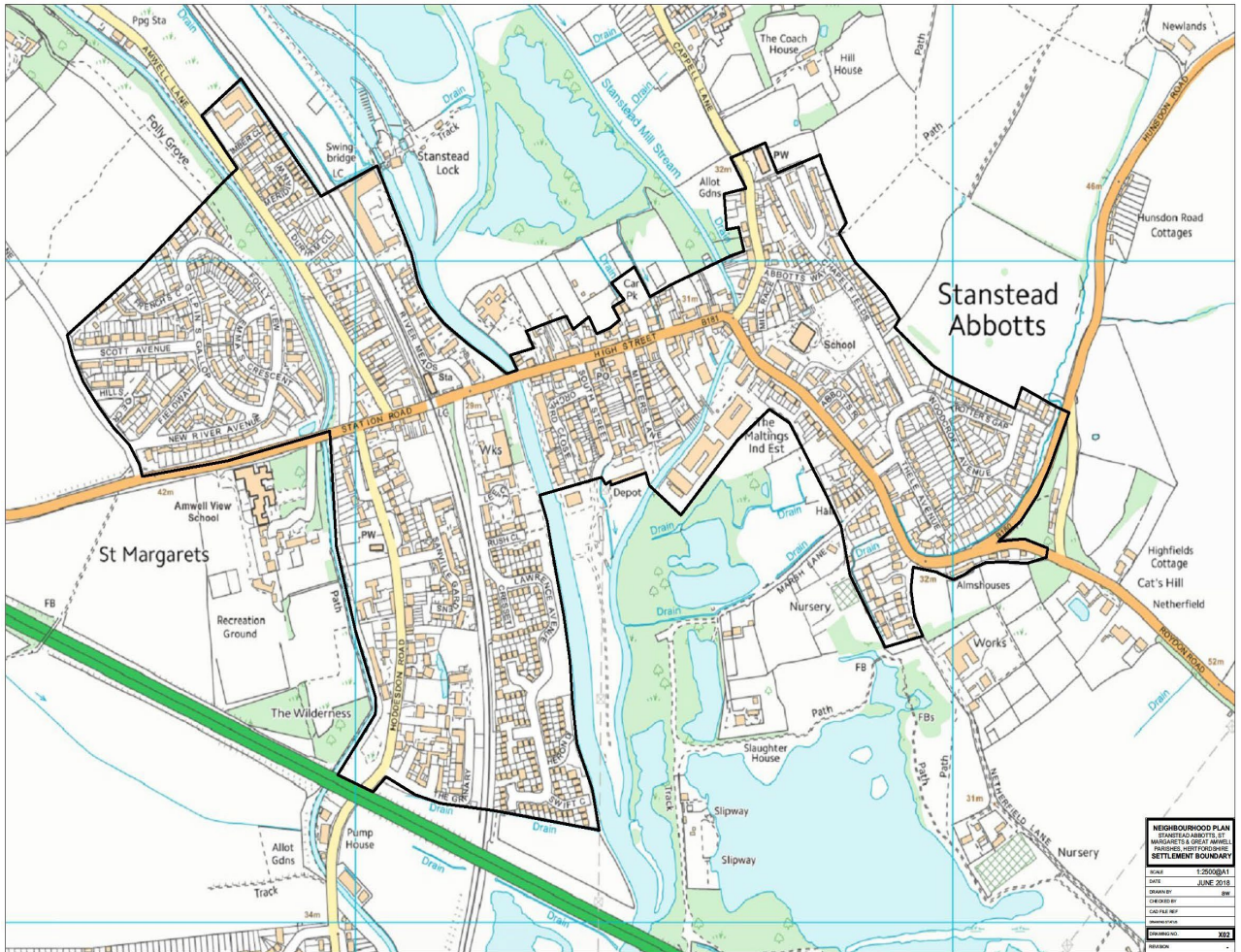


Stanstead Abbots  
St Margarets

- 3.8. In October 2017, JD, as Chair of SAPC, went to address Great Amwell Parish Council (GAPC) together with JV. The intention of this was to invite GAPC to approve of the inclusion of the Folly, Amwell Lane and its associated housing and Rivermeads in the designated area. These parts of Great Amwell were already included in the Settlement Area by EHDC. The Chairman of GAPC had already been present at meetings of the Steering Group and another councillor had also attended a meeting.



Map showing the settlement area.



OS 100052059

The Settlement Area informally referred to as 'the Scottie Dog'

Stanstead Abbots & St Margarets	18 June 2018 <u>Designation Request</u> <u>[1MB]</u>	Stanstead Abbots Parish Council & St Margarets Parish Council
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3.9. Discussions between SAPC, St Margarets Parish Council (SMPC) and GAPC about the designated area boundary led to agreement that all of Stanstead Abbots Parish and the whole of St Margarets Parish would be included but only the small section of Great Amwell which lay in the Settlement Area as defined in the East Herts Local Plan. The designated area was approved by EHDC on September 11th 2018.



#### **4 Developing the Plan and engaging with Residents**

- 4.1 The Steering Group contained members of SAPC, SMPC and GAPC. Other members resided within the designated area. Some members had specialist skills in the various areas involved in such a planning activity or were simply interested members of the public who wished to be involved. It met monthly as did the smaller, core Management Group which dealt with finance and applications to Locality for grants. The Management Group also edited any public statements before they were published on the website, Facebook or in the Parish Magazine and worked closely with the Consultant, JV.
- 4.2 Sub-groups were formed from the Steering Group which met from time to time as was needed. They were tasked with reporting on the following topics:  
Housing; Natural Environment; Business and Employment; Transport and Communications, Design and Community
- 4.3 The Communications Sub-group compiled a detailed survey to be delivered to every home within the DA to ask residents about what they valued in the village and what they wanted to see in the future. It was important to get feedback about where people would favour for the building of the requisite 94 new homes. Plans were put in place for Open Days during the consultation period in different parts of the Settlement Area. Appendix 6
- 4.4 Following on from the Open Days plans were made for a visit to St Andrew's Primary School and the Amwell Society.
- 4.5 Once the questionnaires were returned the answers were fed into the spreadsheet to join the on-line responses and analysis of the data took place. The results are attached to this Statement in Appendix 7. A summary is also available which was published in the Parish Magazine.
- 4.6 The Housing Sub-group put together an advertisement for a Call for Sites and a form to send out on request. A list of sites together with maps were discussed at regular meetings and a matrix of criteria was used to sift them. Some of the sites were found by members of the SG when they went on the walk-arounds. These walks were very useful for communicating with the public what was going on.
- 4.7 The Natural Environment group undertook very detailed information gathering and research so that they would be able to screen any site which was put forward as either a housing site or a green space. It was absolutely





vital that they were fully aware of greenbelt boundaries and flood zones as these have severely limited the availability of land.

- 4.8 The Heritage sub-group made a number of discoveries using Lidor and other means and their work has been undertaken with support from members of the Stanstead Abbots Local History Society (SALHS). They also became knowledgeable enough to screen sites that were put forward by the housing sub-group and others that came through the Call for Sites channel.
- 4.9 The Transport sub-group made contact with the local district councillor, investigated plans for buses and Greater Anglia's plans for extra trains. A survey was commissioned by SAPC into how the potential Sand and Gravel Quarry at the Briggens Estate on Roydon Road might affect traffic. That Survey is Appendix 26
- 4.10 The Business sub-group began face to face information gathering and prepared a survey – the local Facebook Business page administrator gave feedback. By the end of the information-gathering period before Regulation 14, somebody from the NP had communicated with virtually all of the businesses.
- 4.11 The Community Group discussed what was needed on the medical, educational and social fronts in the village. Concerns were raised with the County Council about whether there would be adequate school places to cater for the extra families which it was anticipated would be moving to the village. The apparent closure of the satellite doctors' surgery from Dolphin House in Ware has been a cause for concern.
- 4.12 The Design sub-group initially divided the Settlement Area into Character areas which they then described and built up a picture of what would be required from new builds. Their work was very much built on and developed by AECOM. The needs for future homes are centered on sustainability taking into account the serious flooding problems there have been.
- 4.13 Sub-groups fed back to each Steering Group Meeting about their planning, progress and/ or research.
- 4.14 A Facebook page was set up and regularly updated. The Stanstead AbbotsNeighbourhood Plan website was also developed and regularly updated to make people aware of the work being done and to understand why. It was used to alert people of up-and-coming events, and to provide updates on meetings as part of ensuring transparency.



<https://www.stansteadabbottsneighbourhoodplan.uk/>

Facebook was particularly useful during the pandemic as the article below demonstrates. There is a very popular Community Facebook page and posts on the SASMNP page would be shared and commented on with the potential to be viewed by 3,000 members.

<https://www.facebook.com/groups/392525967789735/>





## How has the Neighbourhood Planning Group decided which sites to put forward for consultation?

This year, we will begin consulting with residents on the list of sites we are proposing for development to accommodate the 94 homes we are expected to build as part of East Herts' District Plan.

We first started looking for places to build on in 2017. We identified around 64 sites through

- ✚ Surveys of the village
- ✚ Walkabouts, carried out over a number of months by people involved with the Neighbourhood Plan
- ✚ Open days where the community was asked for their views
- ✚ Formal "call for sites" (advertises in local paper & online asking landowners to put sites forward)

After that, we developed criteria against which to assess all sites. We used an initial set of critical criteria based on **National Planning Policies** to filter out all unsuitable sites – these were such things as:

- ✚ In flood zone 3
- ✚ On high grade agricultural land
- ✚ On Green Belt land with low suitability for development – essentially things which would mean that planning permission would be refused by the Council.

An absolute key criterion was whether the landowner was prepared to build on the land – some otherwise very suitable sites could not be taken forward because the landowner was not willing to build.

The most important aspect of choosing sites is that each one that is looked at should be judged by the same objective criteria as every other site. When we developed the criteria for selecting our sites, we started with national & local planning guidance and with what was important to the village and worked on from there; it was essential that we did not start with the sites we were already aware of and thus develop skewed criteria that might promote one above others, based on our own preferences.

Decisions have been made jointly by a group of people from all over the village settlement area and following exactly the same steps each time. The criteria and steps that have been used have been endorsed by the independent planning group known as AECOM. We have talked over every aspect of the site selection with AECOM and they have written a report which is available to the public on our website <https://www.stansteadabbotsneighbourhoodplan.uk/>

The full set of criteria used for judging acceptable places to have homes is available on our Neighbourhood Plan website. We also have policies about protecting popular views; community assets and most importantly our green spaces.





## 5 . Main Events

- 5.1 Community survey designed to provide those living in the designated area with the opportunity to inform the Steering Group about what they value in their community and environment, indicate the type of housing they felt was needed in the villages, and comment on their concerns and aspirations for the village. The survey was structured into five themes: housing, transport, heritage, natural environment, and community, leisure and recreation, with a total of 48 questions. A paper survey was delivered to each household, with multiple collection points organised in the village. An online survey was also made available for those preferring to complete the survey online, so that multiple people within the same household could respond independently.
- 5.2 The survey was advertised via community Facebook pages including a Neighbourhood Plan Facebook (Fb) page, the neighbourhood planning website, flyers and posters in the village including flyers handed out at key points such as the train station that serves the village. Notification was also included in the Parish Magazine, delivered – at that time - to each household in the three parishes.
- 5.3 Three open days were held at the Community Room in The Folly, The Nigel Copping Centre in St Margarets Parish and in the Stanstead Abbots Parish Hall. Each of these was held at a different time (afternoon and evening of November 14th 2018 and Saturday November 17th all day) and they followed the same format. They were used to inform the communities in the designated area about why a neighbourhood plan was being developed, engage on the vision for the plan, and to provide people with an opportunity to inform the committee about what they want to protect and develop in the area. At each venue Foamex boards were used to show maps of the village boundary, natural environment and flood zones, and to enable people to indicate where new houses could be built and what they wanted to protect.

Post-its and sticky dots were used to capture feedback.

Those attending were asked to sign in and could leave comments about the event on the way out.



## Open Day at Stanstead Abbots Parish Hall



An evening of information sharing at the Nigel Copping Community Centre



- 5.4 On April 16th 2019, an Open Day was held in the café at the Maltings, Roydon Road to coincide with the distribution of the business survey.
- 5.5 A number of Steering Group members visited St Andrew's School Stanstead Abbots on June 6th 2019 to give two presentations to each of Years 5 and 6.

We were extremely well supported by the Headteacher as well as class teachers during the two presentations which we made during the morning at the school.

At the beginning of both sessions the young people were asked to consider What 94 homes in a street looked like before they were asked to think about where they could be built today.

There was much engagement and when we divided the classes into small groups with maps of the settlement area there were some thoughtful discussions amongst them as to where the necessary spaces were and which would be their preferred options.

- 5.6 A design workshop was held at the Nigel Copping Centre on Saturday 15th June 2019 Flyer Appendix 15
- 5.7 Drop in Session at the Nigel Copping Community Centre 20th July 2019 Flyer Appendix
- 5.8 Presentation to Great Amwell Society 28th July 2019 Appendix 16  
This society was founded in order to consider and respond to planning applications. They clearly have an interest in the Neighbourhood Plan. A few members of the Steering Group focused on the housing policy and used a PowerPoint presentation adapted from the one given to the school. The audience responded with formal questions and there was helpful in-put from a representative of Websters who are promoters of the Netherfield Lane Site. There is a report of this in a newsletter from the Amwell Society Appendix 17







- 5.9 A webinar was presented by the team – led by Sharon Strutt and Anne Washbourn on March 1st, 2021.

Questions were answered on the night and afterwards via the website.

FAQs were answered and posted on the website for future reference.

This webinar remains on the SASMNP website. See Appendix 20

- 5.10 At the request of some residents a meeting was held in the open air at the field where the SG are suggesting that 60 homes could be built. This would include 6 homes on land donated by the landowner for the use of the community and to be owned and managed by the Baesh Alms Houses Trust. Several questions were raised and answers given but as they were helpful to all of the residents the questions and answers were posted on the web-site. Because of Covid restrictions the number attending had to be limited and it was believed that some residents who would like to have come weren't able to.



## **6 . Regular Engagement with residents and parish councillors on the site selection through Public Forums at both the SG and SAPC.**

- 6.1 Before any serious consultation on the SASMNP could begin, it was necessary to update the three parish councils on the process and how we were selecting sites which happened on October 17<sup>th</sup> 2019 and ask for their support. Two members of the housing sub-group – one of whom is an architect and the other a planner – presented an explanation of the starting point with the total number of sites found and how they had been reduced to a number which could provide approximately 94 homes. Once the PCs had agreed the landowners could be approached.
- 6.2 During that meeting there was much discussion and querying of the method employed by the Housing Sub-group for sifting the sites. Following that meeting and in view of the discussion, the housing sub-group took several sites back through the matrix of criteria to rescore them. This confirmed their initial findings.
- 6.3 At the subsequent meeting of SAPC (4th December 2019) several actions were agreed in response to strongly felt views of three councillors who had misgivings about the work done so far by the SG. It was agreed that the NP would be a standing item on SAPC agendas and that for any future meeting with the other two parishes documents would be available sooner. Further explanation was given regarding the constraints on sites available. Reassurance was given about the minimal need for new infrastructure for 94 homes.
- 6.4 From the beginning of January 2020 the SG meetings included a public forum item to be run in a similar way to the PC public forum. The first residents to attend the SG, in the Maltings Café, were the owners of Site C5 who sought clarification as to why their land was given a low score in the third round assessment.
- 6.5 Opposition to the sites selected by the SG came in the form of adverse comments from members of SAPC on Facebook even as the informal pre-Regulation 14 Open Day was being advertised. The SG felt great concern that rather than social media posts about the plan originating from them opponents were repeating claims made during meetings without including the responses which had been made to explain and clarify these claims. A face to face consultation was badly needed and had been planned – even down to the rota of people to be on hand to explain the housing



sites. Unfortunately, this planned informal consultation Open Day had to be postponed because of the lockdown.

- 6.6 From March 2020, SG meetings had to take place on Zoom. Visitors attended from South Street who wished to alter their boundary before any land belonging to the Lea Valley Park were sold. The SG offered support and agreed to send a message to LVP. [The LVP wanted that decision to be left to the potential purchaser and developer of the land.]
- 6.7 At the June SG meeting, JD was able to report back about discussions with the Baesh Almshouse Trustee and a housing officer from EHDC. There was encouragement for the proposal to include community housing sponsored by the Baesh Alms Trust on land which could be donated by the owners of Site K should it become approved.
- 6.8 Cllr Bob Deering, Chairman of Hertford Town Council, attended the SG meeting in October 2020 in preparation for chairing the next Three Parishes Meeting, to be held in public and on Zoom.
- 6.9 Pre-meetings of PCs were also to be held immediately before the Three Parishes Meeting began so that each council had one vote on the proposed sites beforehand. This meeting of the Three Parishes was intended to allow the SG to take the site selections for housing forward to Regulation 14. It was advertised as any PC meeting would be and it was intended that any attending members of the public should speak briefly. The agenda became problematic as SMPC and GAPC put forward amendments to the proposals.
- 6.10 Presentation from Jacqueline Veater (JV) Consultant to the Neighbourhood planning (NP) group. Copy forwarded with these minutes and available on the Neighbourhood planning FB page, it will also be made available on the NP website.
- 6.11 JV explained that the NP needed to fit in with the East Herts Council District plan and was a way for SAPC residents to inform the planning process. Following the presentation, the Public were invited to comment or ask questions.

How were the sites chosen? JV responded - the NP group had spent 2 years looking for sites, some were volunteered by their owners. They developed a set of criteria and sites were scored against these criteria. In addition, independent planning consultant AECOM examined the criteria and suggested one further site behind St Andrews church.



H6 Thames Water site in Amwell Lane Suggested 10 buildings, originally looked at 2-3 storeys, flats, or maisonettes not necessarily 10 individual properties.

A further comment was made about flooding issues in this area

- 6.12 At the next SG meeting the amendments agreed at the Three Parishes Meeting were supported: homes on Amwell Lane on the Thames Water site would not be higher than two storeys. It was also agreed after the meeting that site NEW Two would not be taken forward – SAPC had wanted to retain this site in order to reduce the numbers at Sites K and L.
- 6.13 10 members of the public attended and their concerns related to site K, NEW2, H6, H7, H8, Site 29. Also sites 30a,36,37 and 38 and the issue of their being occupied during the completion of the NP. Their comments were responded to and noted for further discussion by the SG. Site NEW2, subsequently referred to as H6 was put suggested to the SG by AECOM but on further investigation was found to score badly as it interrupted the historic view of St Andrew’s Church and involved access across land owned by a third party. The landowner has now withdrawn the site.
- 6.14 On November 11 2020 11 members of the public came to the SG Zoom meeting which some had mistakenly been told was a ‘public meeting’ rather than an SG meeting which was open to the public who were entitled to participate in the public forum. The questions that were put were answered by the SG Chair and other members of the SG with a map to help clarify further. Some hostile comments were made suggesting that members of the SG who were also Parish Councillors might have a conflict of interest. There were questions about why the view of the Steering Group was the opposite of the response given by the council to a previous planning application for the brown field site in Netherfield Lane.
- 6.15 The SG confirmed that three out of four proposals put forward as amendments to the Three Parishes Meeting would be approved. Consequently, the design of houses to the West of Amwell Lane would be 1/2 storeys and not 2/3 storeys. It was agreed that the greenfield site sometimes referred to as the ‘sheep field behind the church, NEW2 , would not be put forward. The third amendment referred to maximising locally



affordable housing which the SG approved. However, Amendment 4 was asking the SG to protect the 'Almshouse' Field and that was not approved by the PCs nor the SG as it is a selected site with the inclusion of Community Housing.

- 6.16 Following the SG meeting on November 11th there was much activity on Facebook initiated by a group of residents from Netherfield Lane who began a petition that was signed by approximately 1,000 people who lived in all corners of the globe – and around 30 in the village. At the prompting of one of these residents the landowner of Site 11 was again approached and again asserted that as the Openreach lease continued until 2025 they did not know what the future beyond that would be.
- 6.17 There seemed to be concern amongst SAPC members that the selection of sites had not been objective. This concern was linked to the fact that two councillors on the SG lived outside SA Parish. The legality of this was rechecked and a communication from the Chair of GAPC restated for the benefit of any doubters that the process for site selection was intentionally completely objective.
- 6.18 On January 7th 2021 AECOM's report on the site assessment was discussed at an extraordinary meeting on Zoom of SAPC as well as a commentary on it written by one councillor who asked for clarification on certain points relating to the initial critical sift not being clearly described and a few other concerns. These were responded to by members of the Housing Sub-Group who are also Parish Councillors. During the public forum three out of eleven members of the public spoke about the petition, to ask why a site on Kitten Lane wasn't being considered and why there were any plans to build on green belt land. In answer to these points we explained again about the need to keep within the Settlement Boundary or at least to sites that are adjacent to it. The reluctance of the SG to take land from the Green Belt was reiterated and the fact that permission will need to be sought from EHDC. The point was made again that the overwhelming requirement as revealed in the consultations was for affordable housing which means there has to be a sizeable site for the formula of 40% to be triggered.
- 6.19 It was unfortunate that covid had limited opportunities for face-to-face consultation but assurances were made that something would be done soon to make up for the postponed 2020 event. [ The webinar took place a few weeks after this on March 1st 2021 ]





- 6.20 At the end of this meeting which had been called to approve the change made by the SG to the site selection following the Three Parishes Meeting, the opponents of the NP turned down the changes by one vote while there was one abstention.
- 6.21 Following this SAPC meeting a workshop was run by the consultant, Jacqueline Veater, to appraise SAPC members exactly how the SG had reached the situation they are in which was a stalemate preventing further progress. It was suggested that more technical help should be applied for from Locality to help to resolve the disagreements but that it should not be provided by AECOM.
- 6.22 The next meeting of SAPC was attended again by some of the same members of the public as well as Jonathan Trower who explained how the Baesh Alms Trust could be involved with a potential development at Netherfield Lane on Site K
- 6.23 The following is an extract from the minutes of that meeting:

**138/21 Public Forum – Members of the public were invited to speak by the Chairman..**

Jonathon Trower spoke about the history of the Baesh Alms Trust which is a charity that was set up to provide housing for those in need in Stanstead Abbots. With support from the right developer 6 more affordable housing properties could be built.

There were eight members of the public present, three members of the public spoke on the Neighbourhood Plan (NP). Comments on the NP included concerns over the consultation going ahead during the COVID-19 pandemic, who paid for the AECOM report and the site assessment criteria. One member of the public felt the promotion of the Websters site at Netherfield Lane on Facebook by the NP group was biased and felt that Councillors should be impartial. One member of the public accused councillors on the NP steering group of not disclosing pecuniary (financial) interests, this was withdrawn by the member of the public due to a misunderstanding of what pecuniary interests are.

- 6.24 The SG met on February 10th 2021 and this meeting was attended by Cllr Joseph Dumont, (EHDC ward councillor for Stanstead Abbots) two representatives of the owner of the large site in Netherfield Lane and 6 members of the public. The meeting included a Public Forum and 5 questions were put by members of the public. The first question had been answered previously but the questioner felt this had not been clear enough: why were we looking at provision of 118 homes when we only needed to provide 94 including those which had become occupied during the process? The meeting heard that some of the sites were going to be challenging to bring forward – it was better to have the capacity to allow for that. There was a very reasonable request for a larger scale



version of the matrix than the one in the AECOM report which could not be read on-screen. There was concern expressed that future SG meetings would sometimes be working groups which would not include a public forum. The answer was that work had to be done more rapidly than was possible when the public forum was on the agenda. A fourth question was about how a resident could join the SG – they were asked to write to the SG outlining their particular interest and possible contribution to a sub-group. Finally there was a question about how the Co-Op/Post Office had come to be selected as the centre of the village which was a vital sifting question. It was the unanimous view of the SG that the functional centre of the village was the Co-Op/Post Office and therefore no changes were required.

- 6.25 14 members of the public attended SAPC on March 4th 2021 and during the Public Forum there was criticism voiced about the SASMNP – in particular those present were opposed to the loss of green belt and asked the SG to reconsider other sites. Again concern was expressed that the public forum would not always be on the SG agenda – it was explained that when any significant decisions were due to be made there would be a public forum but not when the work to be done was just making progress with the administration work. Cllr Alex Curtis (who represented Great Amwell on EHDC) spoke to the meeting and stressed how vital it is that a NP is put in place to safe-guard against a considerable increase in development in future. He was particularly anxious about the very large site being promoted by Catesby just south of the A414 and adjacent to site C which the SG does not wish to include in the selection.
- 6.26 Four members of the public attended SAPC Meeting on April 8th 2021 and there was concern expressed not only about the change to the SG Terms of Reference which was on the agenda – the new rule that the SG could meet as a working party without the attendance of the public – but again about development on Netherfield Lane. At the suggestion of one of the councillors it was agreed that a meeting would be held at the site and that residents adjoining the site would be invited to come and have their say to the key members of the Housing Sub-group. Because of the Covid rules numbers would be restricted to 30.
- 6.27 See Appendix 14 for a report of this meeting which was held the following month in the field which was made available by the owners. One member of the public who lived near-by suggested a meeting should also be held at the site near St Margaretsbury. There were no requests for this from residents there and no such meeting was arranged.



- 6.28 Following disagreements within SAPC which was delaying the smooth passage of the SG's suggestions Locality were asked for technical help to review what had been proposed. The outcome of this review by Intelligent Plans was that SAPC were urged to progress to Regulation 14 as soon as possible. SAPC discussed the outcome and narrowly voted in favour of taking that step at a meeting of the PC on 22/7/21.
- 6.29 EHDC granted us permission to go ahead with the Strategic Environmental Assessment and the Habitat Regulation Assessment in view of the local SSSI, Special Area of Conservation and RAMSAR site. AECOM took a few months to complete this and the Regulation 14 Consultation was delayed.

## 7. Regulation 14 Consultation

- 7.1 The Regulation 14 Consultation ran from 6<sup>th</sup> February 2023 to 2<sup>nd</sup> April 2023. A copy of the plan was deposited at East Herts District Council in Hertford, the Village Café in Stanstead Abbots High Street and at the Maltings Café in the Maltings Business Centre. It was also available on the Neighbourhood Plan website. 170 emails were sent out to non-statutory and statutory consultees. Leaflets containing the policies in the NP were hand delivered to every address within the designated area.
- 7.2 Drop-in sessions took place on Saturday 25<sup>th</sup> February at the Nigel Copping Community Building on Hoddesdon Road, St Margarets between 10am – 4pm; and a second session on Saturday 4<sup>th</sup> March in the Ashlea Room at the Parish Hall on Roydon Road, Stanstead Abbots between 10am – 4pm. There were several members of the Steering Group hosting these drop-in sessions who spoke to 39 attendees.
- 7.3 Following the second drop-in session, a Question & Answer statement was added to the website. People wanted to know what the next step would be after the consultation; they were told about the Regulation 16 Consultation which will be carried out by East Herts District Council. It was stressed to consultees that the Neighbourhood Plan would ensure that any increase in housing would be limited to 10% of those recorded in 2011, i.e. 94 homes.
- 7.4 Positive written responses were received from the following statutory bodies:

NE	Natural England
EHDC	East Herts District Council



HCCMW	Herts County Council Minerals and Waste Team
LVRPA	Lee Valley Park Regional Authority
NH	National Highways
NGET	National Grid Electricity Transmission
NGAS	National Gas Transmission
TW	Thames Water

- 7.5 EHDC said that "East Herts Council ....is broadly very supportive of the emerging Neighbourhood Plan. The Parish Council and the Neighbourhood Plan Group are commended on their hard work to date. The Stanstead Abbots and St Margarets Neighbourhood Plan presents a positive planning document that seeks to shape development and is responding to the strategic priorities in the development plan in a pragmatic way. It is recognised that the neighbourhood plan area has significant constraints, providing a challenging context for the Neighbourhood Plan Group. The Council consider the plan is generally very well-written, well-evidenced and the policies are locally specific. The Council particularly supports the proactive approach taken to analyse, protect and enhance local character. "
- 7.6 58 written responses were received from residents and nine from the statutory consultees. A Steering Group working party sorted the responses and prepared a list of proposals and replies. Consideration of those responses and the changes made are set out in the section below.
- 7.7 The Environment Agency did not respond to the consultation within the timetable set out and despite chasing for a response. The SG acknowledge that they are a significant statutory consultee and following the flooding incident on the 2<sup>nd</sup> and 3<sup>rd</sup> May 2024 which significantly affected areas of the village, efforts were made to engage them in the consultation process despite the time lapse. The EA responded on 26<sup>th</sup> July 2024 and their comments have been incorporated into the final plan.
- 7.8 It should be noted that alongside consideration of the consultation responses, the SG became aware of changes to flood zone designations in the village. Explain here about the changes to flood zone and why this impacted on the sites. It became apparent in that the Environment Agency had revised the Flood Zone map for Stanstead Abbots in 2023, removing the previous designation of "Protected by Flood Defences" from all areas. This resulted in a number of the sites that we had previously identified as being suitable for development now becoming Flood Zone 3, which was one of the initial criteria we used for excluding sites. A number of changes were made, and as a



result, three proposed sites in areas now affected by new criteria for flood zones had to be excluded. This has left the Plan with two sites only to accommodate all the proposed development, along with windfall development to meet the housing numbers required in the District Plan.

## 8.0 Consideration of Responses and Changes to the Plan

8.1 The Neighbourhood Plan steering group considered all responses fully; detailed comments are included in the consultation spreadsheet [REDACTED]

A summary of the key issues raised and the SG's responses are set out below.

### General Comments

- 8.2 General comments were received relating to affordability of new homes delivered, impact of existing development including in the green belt, and desire for self-build opportunities. The Neighbourhood Plan cannot address issues of affordability. The allocation of 94 homes set by EHDC is a minimum not a maximum. East Herts DC have a policy for self-build homes and maintain a register of self-build plots therefore no changes were necessary.
- 8.3 Many residents cited concerns around traffic congestion, parking pressures, noise and pollution. EHDC confirmed the quantum of homes falls below the threshold requirements for traffic improvements. Wider issues would be addressed as part of individual planning applications, including parking to be contained within the site. No changes were necessary.
- 8.4 Nature conservation. Concerns around maintenance of existing hedgerows and loss of trees and limited biodiversity gains. Policies cannot address maintenance issues and the NP includes policies to protect trees and loss of valued hedgerows. Issues were raised around the impact of water and light pollution. Policy changes were made to strengthen text relating to water quality and to balance the extent of external lighting for safety with ecological considerations.
- 8.5 Heritage. Residents identified that references to Briggens Grade II designated historic park and garden and Old Netherfield Park were missing, and also that Stanstead Bury is Grade 2\*. Changes were made to reflect these heritage assets however they are already protected through existing policy. Reference was made to including 24 Station Road as a non-designated heritage asset, however this is already in the 2014 conservation area and assessment plan so no change required.
- 8.6 Community Assets. Residents suggested St Andrews Church and St Marys Church should be included. Mention of St Andrews school, playground and the Meadow. As the churches and school are CofE property, the SG considered that they would not require the additional protection provided by a designation of being a community asset. The playground and the meadow is already owned by the Parish Council so does not require an additional designation.



- 8.7 Design. Suggestions were made to include more energy efficiency measures such as insulation, solar panels, heat source pumps to promote carbon neutral development. Changes were made to include and strengthen policy text.
- 8.8 Policy context to include reference to the adopted Minerals and Waste Local Plan documents. Reference was made to the draft Minerals & Waste local plan (July 2022) which is currently scheduled for further consultation. It was noted that if approved, further investigations may be necessary. Additional text was added to the spatial context section of the plan. Noted that applications may require comment from county council, however the SG are unable to provide any further policies at this time.
- 8.9 During the consultation process some residents proposed some additional local green spaces and views for inclusion in the plan. After consideration these were not agreed, as they did not meet our criteria, being outside the settlement area and already protected as part of the Green Belt. That correspondence can be found in Appendix 15.

#### **Lane East of Netherfield Lane/South of Roydon Road.**

- 8.10 Several residents raised concerns around the use of green belt to provide housing, and its impact on the natural environment including loss of views, trees and hedgerows along with risk of flooding due to development. There was however some resident agreement with the need to site housing in Netherfield Lane as land which is not used for grazing, agriculture or leisure activities.
- 8.10 The SASM NP is required to find sites within the settlement boundary and it is not possible to do this without going into the Green Belt. East Herts District Council endorse this approach as being in conformity with the existing District Plan policy VILL1. EHDC proposed changes to the policy on First Homes, which are no longer considered suitable for affordable housing delivery. SASM H3 has been amended to reflect this along with paragraph change to reflect the requirement for 40% affordable housing.
- 8.11 Any development will need to take views 1 and 2 into account which are within the proposed Neighbourhood Plan. Planning policy cannot be used to protect a view from existing properties. The site is not publicly accessible so does not meet the criteria for a local green space and is of limited visual amenity therefore no policy change was required.
- 8.12 Concerns around the loss of trees and hedgerows were also raised by EHDC and connectivity to habitats at nearby Stanstead Innings was also raised by LVRPA, along with concerns around the development intruding into the largely rural valley sides which form part of the Park's character and potential visitor pressure on Stanstead Innings. Members of the SG met with LVRP on site on 9<sup>th</sup> June 2023 to address their concerns, particularly the limited extent to which the proposed



development would impact on the valley landscape and the minimal impact on likely visitor numbers to Stanstead Innings. Site Allocations text relating to Netherfield Lane was amended to reflect the location of the site within the LVRP boundary and reference the LVRPA Park Development Framework (2011) and Area 8 Proposals "The Upper Lee Valley – Rye Meads to Ware". SASM H3 text was amended to strengthen policies to retain all existing trees and hedgerows, enhance connectivity to priority habitats at Stanstead Innings and ensure designs are sympathetic to the setting of the nearby conservation area.

- 8.13 The site is within flood zone 1 and there were no concerns raised by the EA in relation to this site. Natural England will require further engagement as part of any planning application to ensure there is no detrimental impact to Rye Meads which is downstream from the site. A text change was made to SASM H2 to reflect that any sites that fall within the impact risk zones for SSSI's will require further consultation with Natural England.
- 8.14 Concerns around speeding, particularly on the bend and the capacity in the unadopted bridleway to take vehicle movements were considered by the SG. The site is well connected to routes out of the village and has good transport connection generally. It should be noted that safety improvements are already scheduled to further reduce speeding by introducing a village wide 20mph speed limit. National Highways confirmed that the limited level of growth proposed will have no significant impact on the operation of the strategic road network. A full Transport Assessment would form part of any planning application and any changes to the Highway would have to be agreed with Herts County Council. Detailed design considerations cannot form part of the Neighbourhood Plan so no changes were proposed by the SG.
- 8.15 Concerns were raised about the scale of development being too far from local amenities and without additional school or NHS facilities. The quantum of homes proposed is too low to require additional community infrastructure. The SG considered that as Netherfield Lane is a short walk to all village amenities and is below the quantum considered necessary for additional school or NHS provision that no change was required.
- 8.16 Concerns were also expressed about the site in relation to the proposed quarry, which falls outside of the scope of the Neighbourhood Plan and the proposed expansion of Harlow. There are existing houses between the site and the proposed quarry and no adjacency between this site and the development of the Harlow Gilston Villages. A new paragraph was added to section 2: Planning Policy and Spatial Context to clarify this point.
- 8.17 Having weighed up the responses and made text changes to strengthen policies within SASM H3 the SG have retained this site within the Neighbourhood Plan.

### **Land South of South Street**





- 8.18 Resident concerns were raised around traffic and parking problems along South Street, which is a narrow road. Issues around flooding after heavy rainfall were noted by residents and Natural England highlighted concerns given the site is bordering a primary river to the south and a secondary river to the north that feeds into the river Lea.
- 8.19 EHDC suggested that the constraints affecting the site may reduce the number of dwellings that could be achieved, particularly in relation to the location of a pylon and the need to provide a landscape buffer.
- 8.20 LVRPA noted particular constraints around the operation of the site for Marina Operations and confirmed that the site would no longer be available for redevelopment.
- 8.21 As the landowner has withdrawn the site it can no longer be included within the Neighbourhood Plan. SASM H4 is therefore removed.

### **Land West of Amwell Lane**

- 8.22 Several residents raised concerns about flooding with inadequate drainage to the existing roadway, quality of pedestrian walkways and ground conditions for construction. Concerns were also expressed about existing heavy traffic and impact of additional parking close to St Margarets Station.
- 8.23 Concerns were expressed that this is thin strip of land, and a “green finger” of countryside and the loss of views for existing residents. There was a proposal to allocate this site as a Local Green Space.
- 8.24 Thames Water, who are the landowner, were supportive of the proposed development. EHDC were supportive of this site and suggested additional text to clarify the number of homes that could be achieved and to strengthen the requirement for additional water management features. This is a greenfield site not green belt, or eligible to be considered a Local Green Space as the site is not publicly accessible land. Both LVRPA and Natural England identified that the Environment Agency now require an 8 metre “buffer” from the top of waterways banks which would significantly impact on the quantum of homes that could be developed. Planning policy cannot be used to protect a view from existing properties.
- 8.25 In 2023, the Environment Agency updated their flood maps placing this site in Flood Zone 3 with no flood defence protection (see 7.8 above). The SG therefore removed SASM H5.

### **Chapelfields and Abbots Way Garages**

- 8.26 Resident concerns were raised around retention of garages and parking availability, particularly around school drop off times and the impact of developing two small sites.





- 8.27 EHDC supported inclusion of this site and suggested text to clarify the number of homes that could be supported taking into account the topography of the site. Natural England welcomed plans to retain trees on site and to provide additional green infrastructure.
- 8.28 The SG strengthened policy text and have retained this site within the Neighbourhood Plan.

### **Land east of Amwell Lane**

- 8.29 Resident concerns were raised around the ground conditions and the existing pedestrian walkway. It was suggested that additional traffic calming measures would be required along with adequate parking to ensure no additional pressure on already limited parking in Amwell Lane.
- 8.30 Thames Water advised that the site contains an operational sewage pumping station with sewers crossing the site, which would continue to require operational access. EHDC also expressed concerns about the ability of the site to overcome the dual constraints of high pressure sewers and flood risk.
- 8.31 Natural England and EHDC identified that whilst this is a brownfield site, it does contain protected wildlife which would require further assessment from the Wildlife Trust.
- 8.32 In 2023 the Environment Agency updated their flood maps placing this site in Flood Zone 3 with no flood defence protection (see 7.8 above). The SG therefore removed SASM H7.

### **Additional Sites Proposed during the consultation process**

- 8.33 **73 High Street.** Proposal to develop 18-27 homes on the existing site. This site had been assessed when brought forward and failed the critical criteria round as it would be dependent on third party access. The SG agreed there were no grounds to reconsider this site at the present time.
- 8.34 **Land to the north of the A414 and west of St Margaretsbury.** Catesby Estates, a developer which had put forward a site for consideration, sent in a detailed submission critiquing the other sites selected in the plan and promoting their own site next to Amwell roundabout which was considered as part of the selection process but not selected. The Council's Strategic Land Availability Assessment (SLAA) identifies this site forming part of the strategic gap between the settlements of Hoddesdon, Stanstead St Margarets and Great Amwell. As such the larger site proposal was considered to be unsuitable. The smaller site subsequently put forward by Catesby had been considered as part of the site assessment process and was also not selected. There is narrative explaining this within the site selection process section of the Neighbourhood Plan.



- 8.35 The Catesby proposal put forward creating a car park as a community offer. The SG did not consider the delivery of a car park on green belt land in this location to offer any benefit to existing residents. The SG agreed that there were no grounds to reconsider inclusion of this site at this time.

## 9 Engagement with EHDC

- 9.1 The group met with EHDC following the close of consultation to discuss statutory consultees' comments in more detail. In addition to removing the policy on First Homes, additional amendments were made to strengthen the text on greenbelt and to provide additional clarity around housing numbers including windfall allocations and site completions since 2017. We met again with EHDC in February 2024 to discuss further changes to the plan and a revised SEA.

## 10 Health Check and SEA and HRA update.

- 10.1 Locality offered a health-check for the Neighbourhood Plan which we took advantage of, to ensure the final plan was robust. The plan was looked at by Andrew Seaman BA (Hons) MA MRTPI in January 2024. His findings were that the plan is well informed, logically structured and presented and advised that engagement with EHDC prior to submission would enable policies to be refined.
- 10.2 Recommendations and amendments to the draft NP were made as a result which are summarized in the Healthcheck link(zzzz). A summary of these included:
- Evidence detailing how the area was designated
  - Need to update the SEA which will accompany the NP
  - Impact of the HRA screening on EHDC water policies to ensure no adverse impacts arising either in isolation or in combination with other projects and plans. This related particularly to the Rye Meads Waste Water Treatment works to ensure no adverse effect on the integrity of the SPA/RAMSAR
  - Inclusion of the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 came into force on 28<sup>th</sup> December 2018 and amend the prescribed Basic Condition related to Habitats Assessments
  - Avoid repetition of existing national and development policy in consultation with EHDC
  - Maps and figures improved legibility
  - Explanation of how the NP will contribute to achieving sustainable



development

- Update the Basic Conditions Statement
- Minor amendments to existing paragraphs which were made by the SG

10.3 Intelligent Planning had reminded us that both the SEA and the HRA needed to be updated by AECOM following the changes made after the consultation. This task was commissioned, and their revised reports were sent back to us in June and July 2024.

## 11 SEA and HRA update

- 11.1 The Strategic Environmental Assessment (SEA) was revised by AECOM and a response received on 24<sup>th</sup> June 2024. The report considered a range of alternative options and rated them against the key SEA themes to assess the relative impact against biodiversity, climate change, health and wellbeing, historic environment, land, soil and water resources, landscape, population and communities and transportation and movement. The final report is attached as appendix ZZZ
- 11.2 The SEA concludes that overall the NP is not judged likely to lead to any significant negative effects in relation to the SEA themes. Significant positive effects were considered likely through the proposed spatial strategy. Minor negative effects were considered likely due to localised impacts to landscape and soil resources largely due to an element of greenfield development which is inevitable in any spatial strategy for the plan.
- 11.3 Specifically in relation to the Netherfield Lane site it notes uncertainty around impact to the historic environment however notes significant negative effects can be avoided through good design, supported by the policy requirements for significant green infrastructure enhancement at the site which are sympathetic to heritage settings.
- 11.4 With regards to biodiversity, it was considered that the policy mitigation provided through the NP and responding to NE's concerns are sufficient to avoid significant effects arising.
- 11.5 The revised Habitats Regulations Assessment (HRA) document was significantly delayed, and only received by the SG on 16<sup>th</sup> July 2024. The final report is attached as appendix 24. The HRA undertook both Screening and Appropriate Assessment for impact pathways. The Lee Valley SPA/Ramsar could not be screened out and impact pathways considered included hydrological changes, water quality, public access/disturbance and air pollution. Three policies were subject to Appropriate Assessment as they allocated development sites and specified housing numbers and were located within the accepted zones of influence of the Lee Valley/Ramsar.
- 11.6 Following Appropriate Assessment it was concluded that with the implementation of EHDC Policy WAT6 the NP would contain sufficient policy framework to ensure no adverse effects on the integrity of European sites will occur in isolation or in combination with other projects and plans.





**APPENDIX 1**



**MEETING on November 25<sup>th</sup> 2016**  
**STANSTEAD ABBOTTS NEIGHBOURHOOD PLANNING**  
**Attendance and Information Record**

Name, address and e-mail	Please tick if you work in SA	Would you be willing and available to help with the creation of a Neighbourhood Plan? (Y/N)	If you are able to help – state briefly what you would be able and willing to do. eg <ul style="list-style-type: none"> <li>• Project leader and co-ordinator</li> <li>• Finance / grant applications</li> <li>• Maps, plans, draftsmanship</li> <li>• Research and evidence gathering</li> <li>• Questionnaires</li> <li>• Communications and liaison</li> </ul>	Please comment on the idea of Stanstead Abbots and Stanstead St Margarets working together on a Neighbourhood Plan or on two Neighbourhood Plans
Helen Cole h.cullen@live.co.uk 64, Cheselbott	✓	Y	Sit down & talk to people / collect survey etc	?
Conner Hartwig Clare Ewing Angela Barrett		} sent apologies	- said she was interested	
Julia W			main areas of experience • Facebook Comms • Community consultations/events • District policies research • Project planning • Grants	

**APPENDIX 2**

Below is a report of that meeting:

**'YOUR VOICE COUNTS'**

**STANSTEAD ABBOTTS VILLAGE PLAN - FIRST MEETING OF THE STEERING COMMITTEE 25 NOVEMBER 2016**

Out of a population of nearly 1,500, it was disappointing that only 11 people attended the meeting held in the Parish Hall to discuss the District Plan for the future of Stanstead Abbots.

Hosted by the Parish Council and chaired by Julia Davies we were told that now was the residents opportunity to research and discuss the future of our village with regard to publishing a Village Plan to safeguard the future of Stanstead Abbots and the surrounding area.

Samples of other District Plans were passed around to give us an idea of the sort of thing we need to be working towards and the general feeling was that this is



an ideal opportunity to engage the whole community in having their say in how they see the future of Stanstead Abbots developing over the coming years.

With this in mind, it was agreed that we would man a survey outside the Co-Op on a Saturday in January where villagers would be asked their views on future developments etc.

Having completed a brief questionnaire we were asked by Julia if we would like to form the Steering Committee that would liaise with the Parish Council as to how the District Plan would operate. All those in attendance agreed to serve and decided that to make it more personal to the whole of our village we would call it the Stanstead Abbots Village Plan.

Plans are underway to create an eye-catching logo that will be used in all publicity to ensure that all residents of our community know that these plans and proposals are their chance to have a say as to what happens in our village in the future.

If you would like more information on the Stanstead Abbots Village Plan or the country-wide District Plan in general then contact:

[jwitting@stansteadabbottsparishcouncil.gov.uk](mailto:jwitting@stansteadabbottsparishcouncil.gov.uk) or <http://consult.eastherts.gov.uk>

**DO get involved - Have YOUR say - This is YOUR Village - It's up to YOU!**



### APPENDIX 3

Below is the subsequent survey:

## ● COMMUNITY NEEDS SURVEY

Stanstead Abbots Parish Council and others interested in our future plans are asking people in the village what they would like the village to be like in the future. We want to enshrine the best ideas in a Neighbourhood Plan which will require input from everyone who lives or works in Stanstead Abbots. Thank you for taking part.

If you would like to help please e-mail [juliadavies890@btinternet.com](mailto:juliadavies890@btinternet.com)

HOUSING	YOUR COMMENTS
Do we need more? What kind? Where should it be built?	
HEALTH CARE  Is it adequate?  What could be improved?	
EMPLOYMENT  Is there enough in the village?  Where could there be more? Type of employment Sites around the village	
PUBLIC TRANSPORT  What do you think about the train service?  How satisfactory are the buses?	





<p>LEISURE          Are our young people well catered for?          What else could we offer? Where?</p> <p>Are there enough leisure facilities for older people?</p>	
<p>EDUCATION          How satisfied are you with the options available to young people in the village?</p>	

You may wish to give your name and contact details here:.....

The above was a hand-out for the table outside the Co-op and was updated and improved for wider distribution in shops – see over the page:



## APPENDIX 4

Revised version of the initial survey



**IF YOU WANT TO HAVE YOUR SAY ON THE FUTURE OF OUR VILLAGE,  
THEN COMPLETE THIS QUESTIONNAIRE!**

Stanstead Abbotts Parish Council is asking YOU what YOU would like YOUR village to be like in the future. From Housing, Schools, Businesses, the Environment and everything that makes Stanstead Abbotts special, we want to make sure YOUR views are included in the Village Plan. Please complete the questions below and either hand your completed form into The Village Pharmacy by Friday 21<sup>st</sup> April 2017 or telephone Julia Davies on 01920 877633 who will arrange for it to be collected.

<b>HOUSING</b>	YOUR COMMENTS
Do we need more? What kind? Where should it be built?	
<b>HEALTH CARE</b> Is it adequate?  What could be improved?	
<b>EMPLOYMENT</b> Is there enough in the village? Where could there be more? Type of employment Sites around the village	
<b>PUBLIC TRANSPORT</b> What do you think about the train service?  How satisfactory are the buses?	
<b>LEISURE</b> Are our young people well catered for? What else could we offer? Where? Are there enough leisure facilities for older people? Have you used facilities at St Margaretsbury?	
<b>EDUCATION</b> How satisfied are you with the options available to young people in the village?	

If you have any other points you wish to raise, please write them on the back of this questionnaire. You may wish to give your name and contact details here:.....

Printed and published by the Stanstead Abbotts Village Plan Steering Committee



**APPENDIX 5**

## Community Surveys – Summary of reach

December 2017 Survey - 105 launch surveys were completed, providing feedback on housing, community amenities and employment, transport and schools.



## – HOUSING SURVEY RESPONSES

HOUSING	YES	NO	DON'T KNOW
Do we need more?	41	64	1

### TYPE:

- Family Homes
- Starter Homes for young local families
- Bungalows
- Affordable Housing
- 2 & 3 Bed Houses
- 4 Bed Houses
- Low Rise Flats
- Mixture
- Permanent Mooring on River Lea
- Part Rent/Part Buy
- Eco Friendly

### COMMENTS:

- No obvious sites without using Green Belt
- Infrastructure needs to improve first to sustain more housing
- No flats
- Retired/Sheltered accommodation
- Build near train station
- Brownfield sites
- Netherfield Lane
- The Folly
- Lower Road
- Chapelfields
- Gilston should provide sufficient homes without the need to build in Stanstead Abbots



## APPENDIX 6

**THE VILLAGE NEEDS YOUR SUPPORT**

**NEIGHBOURHOOD  
DEVELOPMENT PLAN**  
**your village - have your say**

**HAVE YOUR SAY**

**FIND OUT WHAT IT IS ALL ABOUT BY  
DROPPING IN ON ONE OF OUR ...**

**OPEN DAYS**

**Wednesday 14th November, 11am-3pm, Folly View Community Hall**  
**Wednesday 14th November, 6-9pm, Nigel Copping Community Hall**  
**Saturday 17th November, 11am-3pm, Stanstead Abbots Parish Hall**

[sa.neighbourhoodplan@gmail.com](mailto:sa.neighbourhoodplan@gmail.com)  
[www.stansteadabbotsneighbourhoodplan.uk](http://www.stansteadabbotsneighbourhoodplan.uk)

**ON LINE SURVEY SUBMISSIONS VIA THE  
ABOVE WEB SITE**



# Neighbourhood Plan Survey

Website: [www.stansteadabbottsneighbourhoodplan.uk](http://www.stansteadabbottsneighbourhoodplan.uk)

Facebook Group: [www.facebook.com/groups/392525967789735/](https://www.facebook.com/groups/392525967789735/)

Email: [sa.neighbourhoodplan@gmail.com](mailto:sa.neighbourhoodplan@gmail.com)

\* Required

## 1. Email address \*

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## Welcome to the Stanstead Abbots & St Margarets Neighbourhood Plan Survey

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Dear Neighbour,

By completing this survey you have a unique opportunity to influence the future development of Stanstead Abbots & St Margarets. Your responses form part of a wider consultation process which will inform the creation of a 'Neighbourhood Plan' - this plan is a formal document which will be provided to East Herts District Council on behalf of the villages.

The survey has been developed by members of the Neighbourhood Planning Committee. It details aspects of the villages that are most highly valued - and we need your views on how best to protect and enhance them. We live in such a beautiful area, which is rich in nature and a built environment of communal spaces that we all enjoy (e.g. playgrounds, open fields and the riverside). There are challenges too; in particular traffic, parking and increased pressure for housing developments on green field sites.

Change and growth is inevitable - we know how considerably the villages have evolved over time! The Neighbourhood Plan is not about stopping development, but ensuring that we have a voice in directing the needs and aspirations of our community. Once approved, the Neighbourhood Plan has legal weight in setting out what development is acceptable to those of us living in the villages. In conjunction with the East Herts Local Plan, it will be used in assessing planning applications and any ecological recovery work in the villages.

Please complete this survey and encourage others to do the same. The more responses we receive, the greater weight our Neighbourhood Plan will have. (If you complete the online survey, please do not also complete a paper copy).

## About You

We follow the Data Protection Act at all times when asking for and handling your information. Personal data will be used only for the purpose which it has been collected. Your responses are treated confidentially and will be disclosed anonymously if any comments are included in the final Neighbourhood Plan (e.g. if used as a quote).

## 2. What is your postcode? \*

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**3. What is your age? \***

*Mark only one oval.*

- Under 16 years
- 16 - 19 years
- 20 - 29 years
- 30 - 39 years
- 40 - 49 years
- 50 - 59 years
- 60 - 74 years
- Over 75 years

**4. How long have you lived in the village(s)? \***

*Mark only one oval.*

- Less than 1 year
- 1 - 2 years
- 3 - 5 years
- 6 - 10 years
- 11 - 20 years
- Over 20 years
- Entire Life

**5. What is your work status? \***

*Mark only one oval.*

- Full-time Employed
- Part-time Employed
- Self-employed
- Student
- Looking after home/ family
- Unemployed
- Retired
- Other

**6. Does anyone in your household work in the village(s)? \***

*Mark only one oval.*

- Yes - every day
- Yes - some days
- No



**7 If anyone in your household works outside the village(s), which location do they work in? \***

If there are multiple commute locations for your household, please select the location most frequently travelled to.

Mark only one oval.

- NOT APPLICABLE
- Bishops Stortford
- Harlow
- Hertford
- Hoddesdon
- London
- Other - Cambridgeshire
- Other - Essex
- Other - Hertfordshire
- Other

**8. What type of house do you live in? \***

Mark only one oval.

- Detached House
- Semi-detached House
- Terrace House
- Flat
- Boat, Caravan or Temporary Structure
- Other

**9. What is the status of your house tenure? \***

Mark only one oval.

- Owner Occupied
- Rented from Council or Housing Association
- Rented from Private Landlord
- Old People's or Care Home
- Other

**10. Is anyone in your household permanently sick or disabled? \***

Mark only one oval.

- Yes
- No
- PREFER NOT TO DISCLOSE

**11. Do you want to save your answers and quit for now? \***

You can return to complete the survey at a later date/ time.

Mark only one oval.

- Yes Stop filling out this form.
- No



## Heritage & Community

Stanstead Abbots Local History Society (SALHS) are the custodians of facts and stories about the people who've occupied this land for over 8000 years. We are privileged to live amongst many sites of great historical importance; including listed buildings, unseen archaeological sites and the prime (or 'Greenwich') meridian line which passes through our village.

For more information visit: [www.salhs.org.uk](http://www.salhs.org.uk)

### 12. How important is it to preserve our heritage? \*

Mark only one oval.

0	1	2	3	4	5	
Not Important	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Critically Important

### 13. What do you like most about living in the village(s)? - select all that apply \*

Check all that apply.

- Always lived here
- Access to major routes
- Close to family/ friends
- Close to place of work
- Common & open spaces
- Lovely countryside
- Village atmosphere
- Other: \_\_\_\_\_

### 14. If you were not born here, what attracted you to move to the village(s)? (optional)

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### 15. Do you want to save your answers and quit for now? \*

You can return to complete the survey at a later date/ time.

Mark only one oval.

- Yes      *Stop filling out this form.*
- No

## Housing & Development

East Herts District Council have stated in their Local Plan that the villages need to find room for 94 new homes between now and 2030. These can be individual houses, a number of small developments (less than 10 houses) or large developments. Within our Neighbourhood Plan, we can define where these houses should be built, what types of housing we need, who needs them and their desired tenure.

For more information visit: <https://www.eastherts.gov.uk/districtplanexamination>

Stanstead Abbots & St Margarets NP



**16 Why do you think most people leave the village(s)? - elect all that apply \***

*Check all that apply.*

- Available housing is too expensive
- Available housing is too large
- Available housing is too small
- Catchment area for schools
- Family or relationship reasons
- Lack of housing
- New work opportunities
- Public transport is a problem
- Unhappy with changing village environment
- Other: \_\_\_\_\_

**17. What types of home are most needed? \***

*Mark only one oval per row.*

	Least Important	Fairly Important	Important	Critically Important
Flats/Apartments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Starter Homes (1-2 bedrooms)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Family Homes (3-4 bedrooms)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Council or Housing Association	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Shared Ownership	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Old People's or Care Homes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**18. What is your preferred number of homes per new development? \***

*Mark only one oval.*

- Individual homes only
- 2 - 10 homes
- 11 - 20 homes
- 21 - 50 homes
- 50+ homes
- No development

**19. Where would you prefer new developments to be located? - select all that apply \***

*Check all that apply.*

- Infill existing housing (e.g. dividing homes into multiple units or subdividing current lots)
- Previously developed Brownfield Land (e.g. old, disused industrial or commercial land)
- Green spaces between existing developments (e.g. parks, allotments or cemeteries)
- Green spaces outside existing developments (e.g. Green Belt Land which is currently protected)

**0 a features would you want any new development to have? - select all that apply**

*Check all that apply.*

- Communal space
- Electric charging points
- Energy efficient buildings
- Green roofs / walls
- Private amenities (e.g. garden, balcony, gym)
- Off-street parking
- Secure cycle storage
- Sympathetic landscaping
- Wildlife 'safe spaces' (e.g. boxes for birds or bats)
- Other: \_\_\_\_\_

**21. What village facilities and amenities need to be improved either now, or by 2030? - select all that apply \***

*Mark only one oval per row.*

	Not necessary	Needed Now	Needed by 2030
Art/Creative spaces	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Community buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Green spaces	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Job opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Public transport	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Play grounds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schooling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sewage, draining & flood defences	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shops	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Traffic control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wifi hotspots	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>





**22. If there are any locations you consider suitable for a new housing development, please share your suggestion. (optional)**

Where possible, give a grid reference ([www.gridreferencefinder.com](http://www.gridreferencefinder.com)), description of the area and the reason for your suggestion.

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3 Please share any other concerns you have about housing development in the village(s) - including areas you think should be protected. (optional)

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24. Do you want to save your answers and quit for now? \*

You can return to complete the survey at a later date/ time.  
Mark only one oval.

- Yes Stop filling out this form.
- No

## Transport

How we travel from place to place has a huge impact on our every day lives. Understanding your preferred means of transport and village commuting patterns will help identify priority areas for improvement.

25. How do you travel for...? \*

Check all that apply.

	NOT APPLICABLE	Bicycle	Bus	Car	Mobility scooter	Motorbike	Train	Taxi	Walk	Other
Work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
School	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leisure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

26. Are you happy with the village bus services? \*

Mark only one oval.

- Yes
- No
- Other: \_\_\_\_\_

27. Are you happy with the village train services? \*

Mark only one oval.

- Yes
- No
- Other: \_\_\_\_\_



8 a would encourage you to walk or cycle more around the village? - select all that apply \*

Check all that apply.

- NOT APPLICABLE
- Better pavement surfaces
- Better condition road surfaces
- Better street lighting
- Less parking on pavements
- Lower speed limits for motor transport
- More and better connected cycle routes
- More pedestrian crossings
- More street furniture (e.g. benches)
- New pavements where there are none
- Routes cleared of vegetation
- Separation of cyclists from motor transport
- Wider pavements
- Other: \_\_\_\_\_

29. Would any of the following encourage you to drive cars less in the village? - select all that apply \*

Check all that apply.

- NOT APPLICABLE
- Car pooling / car share schemes
- Improved ease of cycling
- Improved ease of walking
- More frequent buses
- On-demand or community buses
- Real-time bus passenger information
- 'Walking bus' for school journeys

30. Would you support any of the following proposals? - select all that apply \*

Check all that apply.

- A pedestrian and cycle-friendly layout at Amwell Roundabout
- Improved, and better enforced, vehicle weight restrictions through Stanstead Abbots high street
- Improved traffic calming and speed reductions in/around Stanstead Abbots
- Traffic lights operating at peak times at Amwell Roundabout



1 If a new site is identified for off-road parking, how far are you prepared to walk into the village? \*

Mark only one oval.

- NOT APPLICABLE
- 0 - 50 metres
- 50 - 100 metres
- 100 - 200 metres
- 200 - 400 metres

32. Do you want to save your answers and quit for now? \*

You can return to complete the survey at a later date/ time.

Mark only one oval.

- Yes      *Stop filling out this form.*
- No

## Nature & Wildlife

The East Herts Council is being encouraged by The Wildlife Trust to create 'Nature Recovery Map', which would detail local wildlife and how they can be reconnected or expanded. To embed such considerations within our Neighbourhood Plan, we need to understand what you value about our green spaces and where better protection is needed.

For more information visit: [www.wildlifetrusts.org/nature-recovery-network](http://www.wildlifetrusts.org/nature-recovery-network)

33. How important is it to protect the following green spaces? \*

Mark only one oval per row.



	Least Important	Fairly Important	Important	Critically Important
Allotments (private)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allotments (public)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bridleways	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Business areas (e.g. the Maltings)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cycle paths	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dog friendly areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farmland	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fisheries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Footpaths	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Meadow next to village play ground	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Outdoor gym equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Picnic areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Play grounds	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
School fields	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Green Belt	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tow path	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Street furniture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Woodlands	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wetlands	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



4 a could we do to ensure our green spaces are used more? (optional)

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35. What should be prioritised to improve the quality of our green environment? - select all that apply \*

Check all that apply.

- Better advertisement / promotion of village amenities
- Better care for trees and hedgerows
- Better enforcement for dog fouling
- Better enforcement of penalties fly tipping and littering
- Better signs for paths and points of interest
- More accessibility measures for the disabled and elderly
- More recycling facilities
- Planting more trees, shrubs and flowers
- Reducing noise and light pollution
- Traffic calming measures (to address any air pollution)
- Other: \_\_\_\_\_

36. Do you want to save your answers and quit for now? \*

You can return to complete the survey at a later date/ time.  
Mark only one oval.

- Yes     Stop filling out this form.
- No

## Leisure & Recreation

Leisure and recreation facilities encompass... formal and informal sport space, community halls, entertainment areas, cultural activities, schools and nurseries, health care (doctors and dentists), meeting places and places of worship.

For more information on local clubs see: [www.stanstead-abbotts-online.co.uk/social.html](http://www.stanstead-abbotts-online.co.uk/social.html)





**7 How do you find information about what's happening in the village(s)? \***

*Check all that apply.*

- Facebook groups
- Parish Council website
- Parish magazine
- Noticeboards
- School newsletter
- Shop windows
- 'Stanstead Abbots Online' website
- Word of mouth
- Other: \_\_\_\_\_

**38. Are you aware, and do you participate, in the following village activities? \***

*Mark only one oval per row.*

	No	Yes - Aware	Yes - Participate
Aerobics / Pilates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Amwell Society	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Badminton	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ballet	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ceilidh Society	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cricket	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Evergreens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fishing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Football	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Great Amwell Women's Club	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hertfordshire Health Walks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Irish Dancing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local History Society	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mad Chatters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Meditation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Merry Widows	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rugby	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sailing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Scouts / Brownies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Slimming World	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Table Tennis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tap	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tennis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Village Club	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Walking Groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Whist Over 60's	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



9 Which facilities are most important to the village? - select all that apply \*

Check all that apply.

- Allotments
- Cafe
- Community Centres
- Grocery Store
- Health Facilities
- Local business (employment)
- Nature Reserves
- Nurseries
- Pharmacy
- Places of Worship
- Play Grounds
- Post Office
- Primary Schools
- Pubs
- Recreation Grounds
- Restaurants
- Shops
- Village Club
- Other: \_\_\_\_\_

40. What else could be improved about the village? (optional)

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41. Do you want to save your answers and quit for now? \*

You can return to complete the survey at a later date/ time.

Mark only one oval.

- Yes      Stop filling out this form.
- No

## Further Information

42. Would you like to be kept informed about progress?

Mark only one oval.

- Yes
- No

Stanstead Abbots & St Margarets NP



43 **Would you like to volunteer or join a focus group to give further input?**

*Mark only one oval.*

- Yes
- No
- Maybe

44. **Full Name (optional)**

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45. **House Name or Number (optional)**

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46. **Phone Number (optional)**

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A copy of your responses will be emailed to the address you provided

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Powered by





Stanstead Abbotts  
St Margarets

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# Neighbourhood Plan Community Consultation Report

Stanstead Abbotts,  
St Margaret's, and  
The Folly

December 2018 Survey - across the three villages included in the designated area, 537 people responded to the survey, either online or via the paper survey, representing about a 20% response rate.



There was a good coverage of responses from across all village postcodes.



FIGURE 1- SURVEY RESPONSES

While there was a spread of responses across adult age groups, most people responding were between 30-59 years of age, with no respondents under the age of 20.

FIGURE 2 - AGE OF RESPONDENTS

Over half of respondents (55%) had lived in the village for 11 years or more, with 8% having lived in the village for their entire lives

Respondents were primarily in full-time (36%) and part-time (12%) employment or retired (36%). Some were self-employed (9%) or looking after home-family (4%).

Of the working population, 67% worked outside the village. With 39% of that group commuting to London and 34% commuting outside Hertfordshire. The most common local commutes to work were Hertford (8%), Hoddesdon (7%), Ware (7%) and Harlow (4%).



Of those who work in the village, 75% of people work some or most days from home with the remaining 25% working from business premises.

84% of respondents owned their homes. Of those renting, 50% were contracted via private landlords and 48% via the council or a housing association.

The unemployed (0%) and student (1%) populations were under-represented.

### *Keeping in touch with the community*

As part of the principle survey, people indicated how they had heard about the neighbourhood plan and the survey, and how they wanted to be kept informed or get involved.

- i. Most common communication methods:
  - Most people are informed via the Parish magazine (72%), Facebook groups (65%), and word of mouth (65%).
  - Some people also use village noticeboards (39%) and Shop Windows (35%).
  - A small group look at Websites (14%) and School newsletters (9%).
- ii. Further Information:
  - 381 people (71%) wanted to be kept informed of progress.
  - 93 people (17%) wanted to volunteer or join a focus group:
    - Natural Environment (65 people)
    - Community (51 people)
    - Housing & Development (41 people)
    - Business & Employment (11 people)





## Launch Survey: Summary of feedback

Feedback from the launch survey by theme was as follows (note: written comments represent individual views not a majority opinion):

	Question	Yes	No	Don't know
<b>Housing</b>	Do we need more?	41	64	1
<b>Health care</b>	Is it adequate?	48	41	5
<b>Employment</b>	Is there enough in the village?	43	18	27
<b>Leisure</b>	Are young people catered for?	23	46	
	Is there enough for older community?	24	21	
	Have you used St Marg'bury facilities?	18	17	
<b>Education</b>	Are you satisfied with the options available?	45	17	29
<b>Public transport</b>	Good	Bad	Reasonable	Don't use
	51	45	16	14

It was felt that if more housing were built in the village, development should prioritise affordable family and starter homes or flats, including part rent/buy and sheltered accommodation, with eco-friendly buildings. While brown field



site development was preferred, it was recognized that there were few options within the village.

If the village were to expand, it was felt that infrastructure would also need to be developed, including a small health centre that offered full time access to a GP and nurse, mobile screenings, and a chemist that was open on Sundays.

It was felt that employment opportunities could be improved through more apprenticeships for young people and facilities to encourage more tourism. Some felt the village was not large enough to support more employment and the traffic that would come with it, fearing expansion would result in loss of the village feel.

For those using public transport, buses were too infrequent and did not include a route to Harlow Town train station. New buses with Wi-Fi were a popular request.

For train users, engineering works were a problem for those using trains at weekends, with trains from London not running late enough into the night. Cancellation of trains were common making it difficult for children getting to school, as well as people commuting into London for work. Longer and more frequent trains at rush hour were a common request, with a faster rush hour trains making fewer stops.

There were mixed views on the quality of leisure facilities provided. The St Margaretsbury centre could be improved with astro-turf pitches, cheaper tennis, and adding a gym. Better clubs with café and crèche could be provided, including a youth club with pool tables, basketball and video games, and a disco, theatre and drama, cinema and a choir. It was felt that the Meadow was wasted space and could include a skate park.

Existing schools were felt to be at full capacity with no possibility for expansion; families were already having to send their children to schools outside of the village. It was felt that the village needed a school that was not a church school.

#### Principle Survey: Summary of Feedback

The principle neighbourhood plan survey was conducted between August – December 2018. Below is the feedback against each of the five themes of the consultation process.

#### Housing



83% of survey respondents wanted to see more affordable or starter homes, with the majority (89%) feeling that these should be to buy rather than to rent (49%).

More than half of respondents (62%) wanted more family homes - 2-3 bedroom properties. 16% wanted to see more 1 bedroom properties for first time buyers, with 20% wanting to see more 4 bedroom properties.

Most people feeding back wanted either semi-detached (61%) or terraced (38%) houses, with 25% of people wanting more detached housing. Bungalows (23%) and flats (24%) were also seen as necessary, with 11% identifying a need for more live/work units (homes that can be adapted as paces of work).

## Age of survey respondents

*Respondents felt that new developments should incorporate the following features:*

- Sympathetic landscaping (70%)
- Energy efficiency (69%)
- Off-street parking – communal (65%), private (61%)
- Wildlife safe spaces (60%)
- Private amenities (e.g. garden, balcony) (59%)
- Discrete off-street bin storage (57%)
- Communal spaces (47%)
- Electric charging points (36%)
- Secure cycle storage (24%)



## Transport

The most common forms of commuter and leisure transport in the village are car (65%) and train (42%). For school runs, cars and walking are popular.

Survey respondents called for the following priority transport improvements:

More frequent and reliable bus services, particularly at weekends and evenings, with cheaper fares, cleaner and more modern electric/hybrid buses with electronic displays and contactless payment. Bus stops should also be cleaner and better maintained.

Train users wanted to see several improvements to the services provided, with dissatisfaction with the reliability of trains and over-crowded carriages at peak travel times.

Respondents also wanted to see:

- A fast service through to Tottenham Hale and later running trains at weekend
- Cleaner, better quality carriages with working air conditioning and clearly labelled disabled access carriages
- Station improvements, including longer ticket opening hours, more reliable ticket machines, a warmer waiting room with toilet facilities, a bridge over the tracks more in keeping with the feel of the village and cheaper parking
- Improved communications about trains and more efficient timing of the level crossing

## Roads

87% of survey respondents supported stricter and better enforced vehicle weight restrictions through Stanstead Abbots high street.

71% supported the introduction of improved traffic calming and speed reductions in/around Stanstead Abbots as part of improving safety and air quality (particularly with walking being one of the main ways people take their children to school).

On Amwell Roundabout, 67% supported the introduction of traffic lights at peak times to manage traffic flows better, with 42% in favour of a more pedestrian and cycle-friendly layout at the roundabout.



## Natural Environment

Respondents indicated the most important spaces to protect were as follows:

- Green area beside Jolly Fisherman and river
- St Andrews School Field
- Kitten Lane Wood & Wildlife Site
- St Margaret's bury recreation ground
- Green areas alongside River Lee towards Rye House
- Meadow behind village playground
- Other areas to protect that might not have been considered:
  - Coppell Lane & Holly cross Road all fields and woodland
  - Cats Hill
  - Chapel fields green space
  - Easneye
  - French & Jupps field
  - Granary green space
  - Land being considered for quarry site
  - Lawrence Avenue green space
  - Marsh Lane field next to Scout Hut and 'gravel pits' site
  - Netherfield Lane field behind Alms houses
  - Sanville Gardens green space
  - Stanstead Innings
  - St Margarets Woodland off Hoddesdon Rd/ St Margarets Rd
  - St Margaretsbury fields and woodland
  - Village playground areas
- Numerous comments that all Green spaces should be protected

Survey respondents fed back that they would welcome the following improvement to the green environment (listed in priority order):

- Better enforcement of penalties fly tipping and littering (92%)



- Better enforcement for dog fouling (72%)
- Better care for trees and hedgerows (64%)
- Planting more trees, shrubs and flowers (63%)
- Reducing noise and light pollution (53%)
- More recycling facilities (42%)
- More accessibility measures for the disabled (38%)
- Better signs for paths and points of interest (35%)

95% of respondents supported all forms of protecting wildlife & green spaces, in particular:

- Protecting against degradation of natural habitats
- Ensuring against loss of wildlife habitats through development
- Improvements to natural habitats and biodiversity

12 residents reported experiencing flooding in the village, particularly on Capell Lane, Marsh Lane, Netherfield Lane, car park and playground, Miller's Lane and Hoddesdon Road. While much of the village is in floodzone 2/3, much of the flooding experienced has been due to poorly maintained drainage systems taking surface water.

### Heritage

94% of people responding to the survey believed it was very or extremely important to preserve the heritage of the village, with the following seen as priority (listed in priority order):

- Public buildings (e.g. halls & churches),
- Attractive old cottages & houses,
- Public art (e.g. memorials),
- Structures associated with the river/ railway (e.g. bridge).

### Community, Leisure and recreation

The survey also asked people living in the village about how they used their environment for leisure and recreation. The most valued aspects of village life were listed as:

- Access to the countryside and waterways (60%)



- Rural character of the area (45%)
- Open and green spaces (36%)
- Easy commute (21%)

When asked what would make them think about leaving the village, respondents stated: (listed in priority order):

- Over-development and aggressive / large building programs
- Increase in anti-social behaviour and crime
- The introduction of a nearby quarry
- Change to life/ family circumstances
- Cost of housing or lack of affordable housing
- Traffic congestion and speed
- Loss of village identity and sense of community (e.g. becoming a town)
- Loss of green spaces and surrounding countryside
- Increased risk of flooding

72 people responding to the survey would like to see more childcare and nurseries (0-4 years), with 37 wanting more allotment space. Respondents also thought that the village would benefit from more:

- Health facilities
- Parking
- Art/ Creative spaces
- Tourist Accommodation

Respondent opinion was divided on whether there was a need for more shops or sports facilities in the village (i.e. depending where/if new housing developments were built)

The 'Assets of Community Value' question confused most respondents, but feedback suggests that the main assets valued are:

- Allotments
- Alms houses
- Churches
- Heritage sites





- Nigel Copping community centre
- Old St Margaretsbury & Buntingford railway line
- St Andrews old school house
- St Margaretsbury recreation ground
- Village pubs and social clubs
- Yacht/ boat clubs

### Community open days

Three open days were held in November 2018 in each of the three villages included in the neighbourhood plan designated area: The Folly, Great Amwell; the Nigel Copping Centre in St Margaret’s; and the Parish Hall Stanstead Abbots.

The events were structured to enable the community to understand the neighbourhood planning process and what was expected and to engage on the five core themes:

- 3.10. Housing
- 3.11. Transport
- 3.12. Heritage
- 3.13. Natural environment
- 3.14. Community, leisure and recreation

“A very well put together exhibition – very clear and most helpful presenters”

78 people attended the three open days: 12 at Folly View, Great Amwell; 24 at the Nigel Copping Centre, St Margaret’s; and 42 at the Parish Hall in Stanstead Abbots.

“A very informative public consultation. Well advertised around the village. Let’s hope they listen to us!”

Overall, people found the open days’ worth attending. Feedback showed that the events were very informative and professionally organized, with knowledgeable volunteers and thought-provoking materials.



## Open day feedback trends

“Infilling is in my opinion the only way to sympathetically increase housing in the village. We would be making a huge mistake creating yet another estate which has poor amenities and doesn’t form part of the fabric of the village. There are plenty of places to infill the village and utilise brownfield development land. Quite why the development down Netherfield Lane wasn’t approved I don’t know but sites like these should be taken advantage of rather than building on our rapidly decreasing green belt. Speaking as a young person of the village, we do not want our countryside blighted by more shocking developments like the future developments like Harlow North. We should take this housing requirement not as an obligation we are required to fulfil, but rather as an opportunity to improve our village looks. The young want housing that is architecturally homogenous and that fits with the style of the village whilst also being eco-friendly. We should not use this as an opportunity to dump a whole bunch of housing in a field to fulfil a quota imposed on us from above powers.”

Housing

Transport



## Heritage

“We need to protect the Heritage of the village. There is so much in this village that the next generation needs to appreciate.”

## Natural environment

Across the three open days, 73 people shared what they valued and wanted to protect about the surrounding natural environment, leaving 120 comments about green spaces, trees, views, wildlife and flooding. (See Appendix X.)

Feedback from the community shows the extent to which the natural environment is valued and embedded into people’s lives, and that villagers are keen to protect the rural nature of the village for future generations.

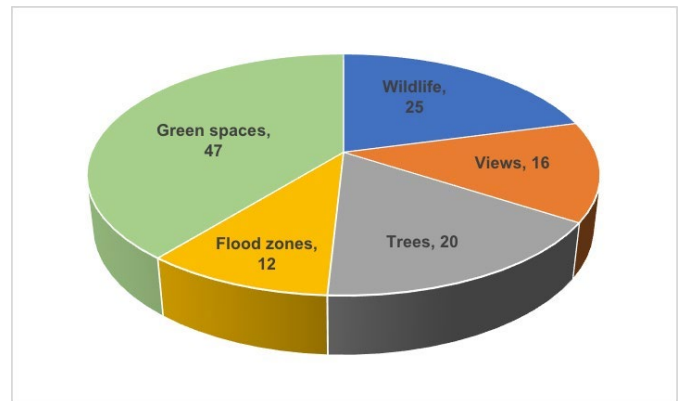


FIGURE 2 - BREAKDOWN OF COMMENTS ON THE NATURAL ENVIRONMENT

Based on the areas of importance marked on the map of the village designated area, the following spaces are important to protect from any further development:

- Wetlands north of the high street
- Kitten Lane and the fields above
- The fields behind the Alms houses
- Along the river
- Green spaces within housing estates south of Station Road
- The school playing field



“Can we plant a new community woodland behind the Alms Hoses to give people a new place to walk and enhance the lungs of the village for clean air?”

“ St Abbotts, St Margarets and the folly have many beautiful pieces of woodland and landscaping which need to be preserved especially the rural aspects of the village, meaning we find ourselves as the last piece of green belt barrier from the ever encroaching approcments of London and all that entails. The nature reserve in Amwell lane is particularly important”

For families living on more modern estates, for example on Lawrence Avenue, the small areas of green space incorporated into these densely built up areas are a priority for protecting from further development, so that playing areas are not lost. Also, for these households, the views of the river and green spaces from the houses are something that should be protected.

Several rare and endangered species of animals and plants are found in the village and surrounding green belt, including orchids, great crested newts, gold crests, kites and owls. Villages recognized the importance of protecting and enhancing the existing green belt to protect species and encourage further biodiversity and saw further development of the villages as an opportunity to plant new, repair hedges, protect mature, ancient and venerable trees and improve footpaths and bridal ways.

“Trees and hedgerows need to be protected and more planted to reduce noise and pollution”

As pollution from the volumes of traffic passing through the village was a problem, planting more trees was part of the solution for improving air quality along with traffic restrictions and calming measures.



“I would not want to see any extra buildings especially on noted green areas that were created when the new estate was created and building to restrict my current view of the river which I love looking at “

While villagers accepted that the area needed to develop, there were concerns that the village would slowly lose its rural feel and become gradually absorbed into surrounding towns and London. Those attending open days were worried that views across the green belt would be lost as new housing is built. Because much of the village is designated flood zone 2 & 3, there was a concern that the green belt surrounding the village would be built because of too few sites within the village boundary, extending the existing boundary of the village.

#### Community, Leisure and recreation

“I have lived in the Village all my life and have always enjoyed walks and nature. I also feel that if there are to be more dwellings then we need to make sure that there are more provisions for people living here i.e. doctors, schools act”



## Call for sites

When asked about where new developments should be located, most people felt strongly that new developments should be located on brownfield land (79%) or infilling spaces within existing built-up area (56%). Only 4% of people are in-favour of building on Green belt land.

- Field North behind St Andrews Church - smallish housing with horseshoe shaped end to Chapel fields with central communal space
- Land along Amwell Lane which has been left for far too long. Could be planted with trees to create a woodland amenity
- Netherfield Nursery Netherfield Lane Housing
- One acre to the rear of Highfield cottage, suitable for high quality development of period housing
- Rear and side of 7 Amwell Lane (semi)
- Rear of the Thai restaurant
- Stanstead Bury Farm, Small number of houses for rent in farmyard area
- Village Playground - Flats, Botton Marsh Lane/Old Factory Units which could exit onto A414, Past St Andrews Church by entrance to Christian College, Factory units at entrance of Lawrence Avenue - 10 houses or extend Lee Close, you can't take green space from greenhouse existing developments these are part of earlier planning process
- Wits End, Netherfield Lane - large garden
- Wits End, Netherfield Lane - small number of homes

Locations residents consider suitable for a new housing development...

- Amwell Lane: From pump house to pond, Land near the railway
- Cappell Lane: Gap in housing at end of road (opposite All Nations), Land between church and Warrax Park
- Chapelfields: Adjacent fields that extend along Hunsdon Road
- Church: Sell and redevelop one of the two churches



- Farmland west of Hunsdon Road North of Trotters Gap
- Fields used for, and opposite to, car boot sale
- Granary: Empty land towards Sanville Gardens
- Highfield Cottage: Land at rear
- High Street: Convert empty shops into housing
- Hillside Farm: Field
- Hoddesdon Road: Old Factory between the church and A10 flyover; Empty site with bungalow c. 300 yards from church
- Hollycross road: Adjacent field
- Maltings: Conversion of units into flats
- Marsh Lane: Field near Scout Hut, Old industrial units, Ambler House field
- Netherfield Lane: Field behind Alms houses, Weblight building, Websters brownfield site
- Nigel Copping Centre: Field behind
- Quarry land: Housing preferable to the proposed quarry
- Roydon Road: Land before A414 junction, David Websters site
- St Andrews School: relocate the school and develop on that site
- St Margaretsbury: Field opposite The Folly
- Station Road: Empty /dilapidated house next to level crossing, Disused land next to Hertford bound railway platform
- Telephone Exchange (next to railway station)
- The Spinney: Re-vamping run down area





## APPENDIX 8



### **Stanstead Abbots and St. Margaret's Neighbourhood Plan**

- **Business Survey - March 2019**

By completing this survey you have a unique opportunity to influence the future development of Stanstead Abbots & St Margarets. Your responses will form part of a wider consultation process, which will inform the creation of a 'Neighbourhood Plan' – this plan is a statutory document, which will eventually form part of the Development Plan for East Herts District.

We need both residents' and businesses confirmation that we have this right and this consultation will help us to achieve that objective.

Members of the Neighbourhood Planning Committee have prepared the survey. It sets out to help us identify those aspects of the villages that are most highly valued – and we need your views on how best to protect and enhance them. We work in an area, which is rich in nature and contains many communal spaces such as playgrounds, open fields and the riverside. There are challenges too; in particular traffic, parking and increased pressure for housing developments on green field sites. Change and growth is inevitable – we know how considerably the villages have evolved over time!

The Neighbourhood Plan is not about trying to stop development, but ensuring that we have a voice in directing the needs and aspirations of our community. Once approved, the Neighbourhood Plan has legal weight in setting out what development is acceptable to those of us living in the villages. In conjunction with the East Herts Local Plan, it will be used in assessing planning applications.



Please complete this survey and encourage others to do the same. The more responses we receive, the better we will be able to judge the feeling in the village and prepare proposals in line with that feeling. We are delivering one paper copy to each business in the village; the survey is also online and we are encouraging people to complete online wherever possible – this may also be an opportunity for others in your business to contribute to the survey if they wish. However, if you complete the paper copy, please do not complete it online as well (and vice versa).

▪ **A1 What kinds of employment should the Plan encourage (Tick any that you would support)**

- Tourism, leisure and crafts
- Transport, storage and distribution
- Food and drink production a Community services
- Offices
- Social enterprises
- Pubs, restaurants and cafes
- Financial and professional services
- Shops- retail
- Light industrial and manufacturing
- Other, please give details

▪ **A2 Should the Neighbourhood Plan allocate more land for employment purposes?(please tick one)**

- Yes
- No

▪ **A3 Which types of site should be allocated for employment uses? (Tick any)**

- Brownfield land (previously developed)
- Existing buildings
- Greenfield land (undeveloped)
- Part Residential

▪ **A4 Where should employment land be located? (Tick any)**



- In or around the Village
- Within the Village Boundary (see map on back page)
- Don't consider there is a need for additional employment land
- Other, please give details

▪ **A5 Should existing employment sites be protected from changes of use? (Please tick one)**

- Yes  No

Space below for further information and opinion

▪ **A6 Should the Neighbourhood Plan include policies that promote working from home?**

- Yes  No

Space below for further information and opinion

▪ **A7 What would encourage businesses to locate in Stanstead Abbots/St. Margaret's? Please tick all that apply**

- |  |                                       |
|--|---------------------------------------|
| <input type="checkbox"/> Location                                  | <input type="checkbox"/> Rental Costs |
| <input type="checkbox"/> Flexibility of Tenure (Short Term Rental) | <input type="checkbox"/> Access       |
| <input type="checkbox"/> Transport Facilities                      | <input type="checkbox"/> Parking      |

▪ **A8 What prevents businesses moving to Stanstead Abbots/St. Margaret's or existing business expanding in the Village area? Please tick all that apply**

- |   |   |
|---|---|
| <input type="checkbox"/> Availability of suitable accommodation | <input type="checkbox"/> Parking availability |
| <input type="checkbox"/> Reduced Public Transport services      | <input type="checkbox"/> Infrastructure       |
| <input type="checkbox"/> Other                                  |   |



- **A9 Should the current core retail area (ie: The High Street) in Stanstead Abbotts/St.Margaret's be extended? (please tick one)**

- Yes
  No
  Don't know

**A10 Thinking of Stanstead Abbotts/St.Margaret's as a location for trade, how would you like to see the Village promote itself?**

## Your business

**B1. What additional space - if any - will your business require over the next five years? Please tick all that apply**

	Up to 50m <sup>2</sup>	50m* to 100m <sup>2</sup>	100m <sup>2</sup> to 200m <sup>2</sup>	200m <sup>2</sup> or more
<b>Industrial/workshop</b>				
<b>Office</b>				
<b>Retail</b>				
<b>Storage</b>				
<b>Other</b> Please tell us if you will have any additional requirements not covered above				

- **And finally.**

- **C1. To help us understand the range of existing businesses in Stanstead Abbotts/St.Margaret's, please tick the box that best describes the nature of your business.**

- Agriculture, forestry and fishing  
 Mining and quarrying  
 Energy and water  
 Manufacturing  
 Construction  
 Wholesale and retail trades, repair of vehicles



- Transport and storage
- Accommodation, hotels, restaurants, food services
- Information and communications
- Finance and insurance activities
- Public administration, education and health
- Real estate activities
- Professional, scientific and technical activities.
- Administration and support service activities
- Arts, entertainment and recreation
- Pre-School Activity
- Other

**C2. If you have other comments about business activity in Stanstead Abbots/St.Margaret's, please write them here**

## ■ **Thank you for taking the time to complete the survey**

Responses to this survey are anonymous and all individual data and information inadvertently collected using this survey will be treated as confidential, will only be used to inform the preparation of the Neighbourhood Plan and will not be passed to any third parties.

### ■ **How to contact us:**

If you are unable to drop the survey off or need help filling the survey in, one of our volunteers will be able to help you. Please contact either Clare on [REDACTED], Andrew on [REDACTED] or Mike on [REDACTED] and they will be able to assist.

**By email:** sa.neighbourhoodplan@gmail.com

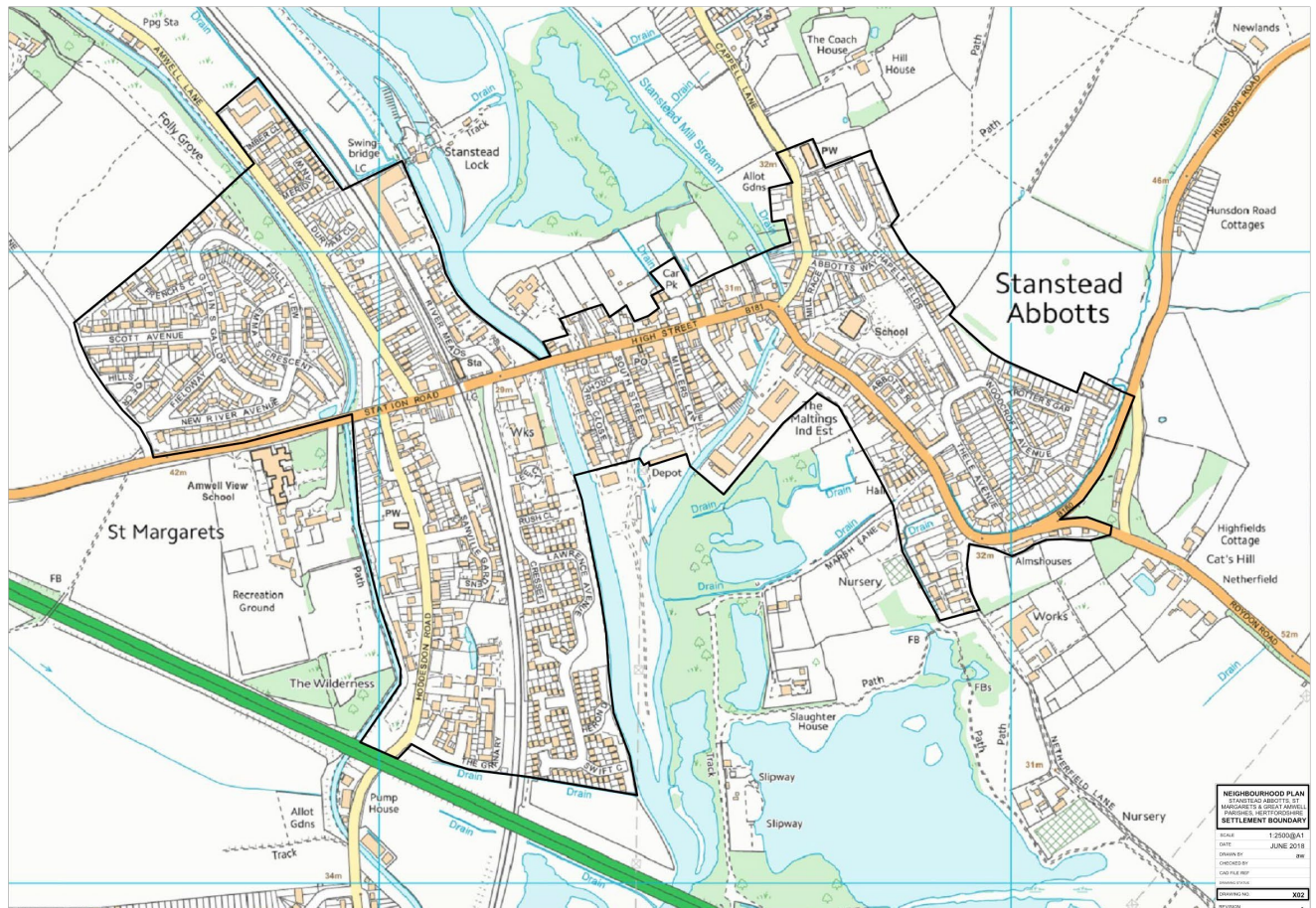
**On line:** You can access the supporting documents already published on the Neighbourhood Plan page on our website [www.stansteadabbotsneighbourhoodplan.uk](http://www.stansteadabbotsneighbourhoodplan.uk)



Follow the link from the 'About' drop down menu on Home page. Click on Neighbourhood Plan.

- **Please return the completed form by post or hand by 31<sup>st</sup> May 2019 to:**

**9A Roydon Road, The Maltings Business Centre, Stanstead Abbots,  
Hertfordshire SG12 8HQ**



Summary of the consultation results presented as an insert in the Parish Magazine (circulated in all three parishes)





Below is the advertisement in the Hertfordshire Mercury asking landowners to submit sites to the SASMNP SG

Public Notices

Public Notices

Essex County Council

(Anchor Lane, Abbess Beauchamp and Berners Roding, Snows Farm Lane, Matching Lane, Church Lane, White Roding) (Temporary Prohibition of Traffic) Order 2019

Notice is hereby given that the Essex County Council intends, not less than seven days from the date of this notice, to make the above Order under section 14(1) of the Road Traffic Regulation Act 1984.

Effect of the orders: To temporarily close the following lengths of Anchor Lane, Abbess Beauchamp and Berners Roding, Snows Farm Lane, Matching Lane, Church Lane, White Roding in the District of Epping Forest/Utlesford.

Phase	Road	Description	Alternative Route	Proposed dates and times
1	Snows Farm Lane, White Roding/Abbess Beauchamp and Berners Roding	From its junction with Matching Lane south to its junction with Anchor Lane	Matching Lane, Church Lane, A1060, Matching Road, Downhall Road, Potash Road, Anchor Lane and vice versa.	From 25/03/2019 to 30/04/2019
1	Anchor Lane, Abbess Beauchamp and Berners Roding	From a point approximately 10 metres east of its junction with Snows Farm Lane, south west for a distance of approximately 466 metres	Matching Lane, Church Lane, A1060, Matching Road, Downhall Road, Potash Road, Anchor Lane and vice versa.	From 25/03/2019 to 30/04/2019
2	Matching Lane, White Roding	From its northern junction with Church Lane, generally south west to its junction with Snows Farm Lane	Church Lane, A1060, Matching Road, Downhall Road, Potash Road, Anchor Lane, Snows Farm Lane and vice versa.	From 01/05/2019 to 29/05/2019
2	Snows Farm Lane, White Roding	From its junction with Matching Lane, south for a distance of approximately 10 metres	Church Lane, A1060, Matching Road, Downhall Road, Potash Road, Anchor Lane, Snows Farm Lane and vice versa.	From 01/05/2019 to 29/05/2019
3	Church Lane, White Roding	From a point approximately 60 metres north of its northern junction with Matching Lane, south east to its southern junction with Matching Lane	Church Lane, A1060, Matching Road, Downhall Road, Potash Road, Anchor Lane, Snows Farm Lane and vice versa.	From 30/05/2019 to 30/06/2019
3	Matching Lane, White Roding	From its northern junction with Church Lane, south west for a distance of approximately 102 metres.	Church Lane, A160, B184, Berwick Lane and vice versa.	From 30/05/2019 to 30/06/2019

The closures are scheduled to commence on the dates shown above however may vary depending on how quickly the works for each phase are undertaken or where appropriate signs are showing and weather permitting. The closures are required for the safety of the public and workforce while works to install a new electricity connection is undertaken in association with a Section 50 Licence. Access for emergency service vehicles and pedestrians will be maintained at all times during the closures. The Order will come into effect on 25 March 2019 and may continue in force for 18 months or until the works have been completed, whichever is the earlier. Dated: 14 March 2019

Essex County Council, Network Assurance, A2 Annexe, Seax House, Victoria Road South, Chelmsford, Essex CM1 1QH  
Telephone: 0345 603 7631  
Website: www.essex.gov.uk/highways

Notice of Variation given under sections 35C and 46A of the Road Traffic Regulation Act 1984 of On-Street Parking Permit Charges in the Uttlesford District Area (Uttlesford District) (Permitted Parking Area and Special Parking Area) (Consolidation) Order 2008 Schedule 1

Notice is hereby given that the Colchester Borough Council as the lead authority for The North Essex Parking Partnership, itself acting as agents for the highway authority Essex County Council, intends, not less than twenty one days from the date of this notice, to vary the above Order relating to fees and charges under Section 35C and 46A of the Road Traffic Regulation Act 1984. It is intended that the changes will take place on 8th April 2019.

The variation will have the effect of changing the tariff of fees for On-Street Parking, Exemptions and Permits – all other fees and charges in the Order will continue at their existing tariffs. Existing and proposed charges are detailed in the Schedule to this Notice

Schedule	Existing	New
Second Resident Permit per property (where available)	£105.00	£103.00
Up to 24 hour Visitor Permits (Pack of 10 – Hard copy)	£15.00	£20.00
Up to 24 hour Visitor Permits (Pack of 10 – Virtual Permits)	£10.00	£11.00
Replacement for lost/stolen Hard Copy 12 month permit	£15.00	£22.00
Dispensation/Suspension permit (1st Day)	£22.00	£23.00
Dispensation/Suspension permit (2nd Day and subsequent days up to 7 days)	£10.00	£10.50
Traders Permit – 12 months	£300.00	£250.00

Notice of Variation given under sections 35C and 46A of the Road Traffic Regulation Act 1984 of On-Street Parking Permit Charges in the Harlow Area (On-Street) (Permitted Parking Area) (Waiting, loading and Parking) (Consolidation) Order 2011 Schedule 2

Notice is hereby given that the Colchester Borough Council as the lead authority for The North Essex Parking Partnership, itself acting as agents for the highway authority Essex County Council, intends, not less than twenty one days from the date of this notice, to vary the above Order relating to fees and charges under Section 35C and 46A of the Road Traffic Regulation Act 1984. It is intended that the changes will take place on 8th April 2019.

The variation will have the effect of changing the tariff of fees for On-Street Parking, Exemptions and Permits – all other fees and charges in the Order will continue at their existing tariffs. Existing and proposed charges are detailed in the Schedule to this Notice.

Schedule	Existing	Revised
Resident Permit (First Car)	£40.00	£42.00
Resident Permit (Second Car)	£80.00	£83.00
Up to 24 hour Visitor Permits (Pack of 10 – Hard copy)	£15.00	£20.00
Up to 24 hour Visitor Permits (Pack of 10 – Virtual Permits)	£10.00	£11.00
Replacement for lost/stolen Hard Copy 12 month permit	£15.00	£22.00
Dispensation/Suspension permit (1st Day)	£22.00	£23.00
Dispensation/Suspension permit (2nd Day and subsequent days up to 7 days)	£10.00	£10.50
Traders Permit – 12 months	£300.00	£250.00

Fees and charges which are not changing are not shown. Dated 14 March 2019

Richard Walker, North Essex Parking Partnership Group Manager, North Essex Parking Partnership, Colchester Borough Council, Rowan House, 33 Sheepen Road, Colchester CO3 9WG

(Low Hill Road, Roydon) (Temporary Prohibition of Traffic) Order 2019

Notice is hereby given that the Essex County Council intends, not less than seven days from the date of this notice, to make the above Order under Section 14(1) of the Road Traffic Regulation Act 1984.

Effect of the order: To temporarily close that length of Low Hill Road, Roydon in the District of Epping, from a point approximately 80m south of its junction with Parkfields for a distance of approximately 45m in a southerly direction. The closure is scheduled to commence on 1st April 2019 for 5 days, or where stated on a valid permit (AZ0081000794937 – Cadent). The scheduled dates may vary for these works with appropriate signs showing and/or displayed on www.roadworks.org. The closure is required for the safety of the public and workforce while gas service works are undertaken by Cadent.

An alternative route is available via Low Hill Road, Epping Road, Water Lane, Epping Road Roundabout, Tylers Road, Hamlet Hill, Netherhall Road and vice versa. The Order will come into effect on 20th March 2019 and may continue in force for 18 months or until the works have been completed, whichever is the earlier.

(Wrights Green Lane, Little Hallingbury and Church Road, Little Hallingbury and Motts Green Road, Little Hallingbury) (Temporary Prohibition of Traffic) Order 2019

Notice is hereby given that the Essex County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984.

Effect of the order: To temporarily close that length of Wrights Green Lane, Little Hallingbury and Church Road, Little Hallingbury and Motts Green Road, Little Hallingbury in the District of Uttlesford, from both of its junctions with Lower Road to its junction with Stortford Road, a distance of approximately 1500m. The closure is scheduled to commence on 18th March 2019 for 3 days, or where stated on a valid permit (EP201EH2269297A – Essex County Council). The scheduled dates may vary for these works with appropriate signs showing and/or displayed on www.roadworks.org. The closure is required for the safety of the public and workforce while carriageway patching works are undertaken by Essex County Council.

An alternative route is available via Lower Road and vice versa. The Order came into effect on 6th March 2019 and may continue in force for 18 months or until the works have been completed, whichever is the earlier.

TOWN AND COUNTRY PLANNING ACTS 1990

The following applications have been made to East Herts Council

- Full Application
- 3/19/0312/FUL at The Chantry House, The Street, Furneux Pelham, SG9 0J - Retention of outbuilding used as workshop/storeroom.
- 3/19/0384/FUL at Much Hadham Tennis Club, Recreation Ground, High Street, Much Hadham, SG10 6DL - Erection of detached hut for tennis club members.
- 3/19/0428/FUL at 190 North Road, Hertford, SG14 2P - Demolish house and buildings. Construction of two (4 bedroom) houses with basements, car parking, driveways, landscaping.
- 3/19/0432/FUL at Coronation Hall, Coronation Road, Ware, SG12 5QX - Demolish building. Erection of 2 bedroom dwelling.
- 3/19/0294/WH at The Retreat, Scholars Hill, Helbam Green, Ware, SG12 - Extension to detached garage at ground and first floor, creation of car port. Addition of roof terrace and outside staircase (retrospective).
- 3/19/0426/WH at Shems Barn, The Street, Aspendon, SG9 9PG - Part conversion of redundant stable block to granny annex, changes to fenestration, remaining part to be used as residential storage.
- 3/19/0403/WH at 22 Muddy Hill, Ware, SG12 7NB - Ground floor rear extension, part first floor rear extension.
- 3/19/0438/WH at 36 Currie Street, Hertford, SG13 7DB - Single storey rear and part side extension. Insert 3 roof lights, changes to fenestration.
- 3/19/0451/WH at 13 Shepherds Court, Bengen, SG14 3HE - Single storey rear extension, insert 2 velux roof windows, conversion and alteration of garage.
- 3/19/0460/WH at 83 New Road, Ware, SG12 7BY - Part single and three storey rear extension with first floor rear balcony and 4 roof lights.

Listed Building Consent  
3/19/0402/LBC at Wayside Cottage, Baldock Road, Cottered, SG9 2XW - Proposed single storey side and rear extensions with glazed links.  
3/19/0421/LBC at Green End Park, Green End, Dane End, SG12 0NU - Exterior works - Replacement and alterations of steps and patio area.  
3/19/0422/LBC at The Old Clock House, 9 Cappell Lane, Stanstead Abbots, SG12 8BU - Remove single storey rear extension, replace with single storey extension (revision to 3/17/0204/LBC, consisting garage door within glazed link, replace with glazed fixed panel).

Advertisement Consent  
3/19/0492/AV at Co-operative Food 46 - 50 High Street, Stanstead Abbots, SG12 8AG - 1 externally illuminated Co-op projector, 1 non-illuminated Post Office projector, 1 set of non-illuminated 'Welcome' for acrylic text, 1 externally illuminated Co-op logo, 1 non-illuminated fence-mounted flat aluminium panel.

All applications are available on the Councils website but for further details of the locations where you can inspect them, and how to comment on them, please call us on 01279 655261 or visit the Councils website.

The Council gives warning, pursuant to its powers under section 225 of the Town & Country Planning Act 1990, that it will remove or obliterate any placard or poster displayed in contravention of administrative boundaries of East Hertfordshire District Council.

STANSTEAD ABBOTTS/ST MARGARETS NEIGHBOURHOOD PLAN CALL FOR SITES FOR POSSIBLE FUTURE DEVELOPMENT

The District Council requires Stanstead Abbots/St Margarets Neighbourhood Plan to put forward possible sites within the village settlement area (or immediately adjacent) for future development. If you would like to put forward a site, please get in touch with us via the web-site or email as explained below, by Friday 5th April.

This exercise will not in itself decide whether a site will be allocated for development in the Neighbourhood Plan nor will it commit the proposer to apply for planning consent. The site suggested will be considered as part of a site assessment process for inclusion as site allocations in the final Plan. If you would like to suggest an area (big or small) to be considered for development, please email us at [stansteadabbotsneighbourhoodplan@gmail.com](mailto:stansteadabbotsneighbourhoodplan@gmail.com) providing your name and contact details and we will send you a form for site assessment purposes.

The site must be within or close to the village settlement area. Please see the website for further information and a map.

[www.stansteadabbotsneighbourhoodplan.uk](http://www.stansteadabbotsneighbourhoodplan.uk)  
[stansteadabbotsneighbourhoodplan@gmail.com](mailto:stansteadabbotsneighbourhoodplan@gmail.com)

SHIRLEY ANNE KEMP (Deceased)  
Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the above-mentioned deceased, late of 58 Chaucer Way, Hertford, SG14 2DD, who dies on or after the 28th day of January 2019, are required to send particulars thereof in writing to the undersigned (petitioners) at or before 24/02/2019, after which date the Estate will be distributed having regard to the claims and interests in which they may have had notice.

JOHN BARNES (Deceased)  
Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the above-mentioned deceased, late of 58 Chaucer Way, Hertford, SG14 2DD, who dies on or after the 28th day of January 2019, are required to send particulars thereof in writing to the undersigned (petitioners) at or before 24/02/2019, after which date the Estate will be distributed having regard to the claims and interests in which they may have had notice.

ATTESTING JANEAN HILL, Solicitor, Hertfordshire SG12 5EA

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Stanstead Abbots & St Margarets NP



**APPENDIX 10**

Visit to St Andrew's School - 6th June 2019



Slides No / Activity	Who AM	Notes
2	JD	<p><b>INTRO – Why are we here?</b></p> <p>What is a Neighbourhood Plan</p> <ul style="list-style-type: none"> <li>- High level, explain that this is about people living in the village being able to have a say in types of houses that will be building the village</li> </ul> <p>Why are we talking to you?</p> <ul style="list-style-type: none"> <li>- You are the future of the village – this is your chance to say what you would like</li> </ul> <p>Why do we need your help</p> <ul style="list-style-type: none"> <li>- At several points today, we will ask for your help. What you help us with will help us define the plan for the future of the village</li> </ul>
3	MD	<p><b>What does this mean?</b></p> <p>Explain about the fact that the District Council have stated that we need to build 94 new houses by 2033 due to</p> <ol style="list-style-type: none"> <li>1. More people coming to live in the area</li> <li>2. Population increasing (bigger families / more families)</li> </ol> <p>We have to make a plan to develop this ... which includes</p> <ol style="list-style-type: none"> <li>1. HOW do we want the village to look –</li> <li>2. Not just about building houses, but what else do we need to think about ... <ol style="list-style-type: none"> <li>a. The impact of houses on the village → <ol style="list-style-type: none"> <li>i. More car parking</li> <li>ii. More places to play ...</li> </ol> </li> </ol> </li> </ol> <p>This takes time – will happen whilst you are growing up ...</p> <p>94 houses is a lot – it's about the same as rebuilding Chappell Fields, Chappell Lane or Roydon Road all over again</p>
4	SC	<p><b>Who are we building for?</b></p> <ol style="list-style-type: none"> <li>1. People of all ages from babies through to the elderly</li> <li>2. Families, single people, retired/elderly</li> <li>3. People with disabilities</li> </ol>
5	GT	<p><b>What do all these different kinds of people need in their community?</b></p> <ol style="list-style-type: none"> <li>1. Schools – protect play fields?</li> <li>2. Playgrounds – who uses them (like St Margarets ...)</li> <li>3. access to busses &amp; trains</li> <li>4. shops</li> <li>5. Dr &amp; dentist</li> <li>6. Green fields &amp; trees</li> <li>7. Jobs</li> </ol>





St Andrew's C of E (VC) Primary School

'Learn to love and love to learn; in God's love each one will shine.'

## St Andrew's Weekly Update

**Date: 7.6.19**

**Headteacher: Mrs H Gillingham**

**Value: Truthfulness**

Dear Parents and Carers,

I hope you all had a good break – the children all looked well rested when they came back into school. We have had a busy first week back which has included a visit from the Neighbourhood Planning team. They explained to the Year 5 and Year 6 classes the issues surrounding proposed building of new houses in the local area. The children were then given the opportunity to share their ideas about where any building should take place. It was an informative and interesting morning.



Year 1 have been busy practising their phonic skills before their forthcoming screening. I ended up getting involved in a phonic game, trying to find a tricky word before my competitor did. I lost!



## APPENDIX 11

### ▪ **Talk to Great Amwell Society June 27<sup>th</sup> 2019**

The Chair of Communications wrote:

To summarise the points we made today in a brief meeting:

1. Talk shouldn't last longer than 35-40 minutes over-all to allow for questions - I think they will have a good look at the boards and feel they already understand a lot about the process.
2. Sarah to talk about constraints - historical, ecological and green belt in terms of preserving heritage according to planning rules and wishes of the residents who responded to the presentation.
3. Mike to emphasise what East Herts tasked us with, how we are assessing sites bearing in mind those constraints and the survey results and flooding issues. Refer to plans for community-led social housing.



## Stanstead Abbotts, St Margarets & The Folly Neighbourhood Plan



## Neighbourhood Plan

Julia Davies, the chair of Stanstead Abbots Parish Council, came to our meeting in June with her team to talk about The Stanstead Abbots, St. Margaret's and The Folly Neighbourhood Plan.

The requirement for the plan is to find 94 houses within the designated area, which was displayed, for us on a map. The settlement area includes the Folly Estate – part of Great Amwell.

Planning is not simply about scrutiny but is a creative exercise in finding ways to enhance and improve the places in which people live their lives. Therefore groups are consulted on matters such as ecology – making an area plastic free for instance; historical aspects – founding a museum for example. The team has had many meetings with sub-groups and engaged with residents, schools and in public meetings. When sites are selected all three Parish Councils have to agree they are acceptable.



Because of population growth there have already been developments in the village in recent years. Problems in finding new sites include: that we are surrounded by Green Belt; there is a lot of water around (flooding occurred in the area 5 times between 1905 and 1968.) Constraints to building include protected wildlife; also there are listed trees.

There is a danger that the Village Plan is under the District Plan and Hertfordshire can impose a plan on them if they do not come up with a Neighbourhood Plan. For this reason they are concentrating on any feasible sites within the area and these were pointed out to us on the maps. For any decision they are in the hands of other people. There are battles between developers and planners. Costs have to be set off against the obligation to provide affordable housing, for instance the cost of just removing lampposts from one of the sites would cost several million pounds. Costs increase for surface water drainage. Some infill may be possible, particularly in The Folly.

Property experts are consulted to see if the plan will work. Various bodies must also be consulted: Parish Councils, County Council, Environment Agencies, Highways Agencies, also bodies representing the interests of ethnic, racial and national groups. Julia emphasised the need for them to keep constant control of the plan.

The team has clearly put a lot of time and thought into their research and Peter Troughton thanked them very much for their presentation.

*Diana Matthews*





**Stanstead Abbotts and St Margarets Neighbourhood  
Planning Steering Group**

**DROP-IN SESSION FOR ANYONE IN THE 3  
PARISHES**

- **On Saturday July 20<sup>th</sup> 2019 you are very welcome to come and talk to us about the ideas we have had so far for the village. We will be at the Nigel Copping Centre, Hoddesdon Road, Stanstead St Margarets between 10am and 11.30am.**

**We would be particularly keen to speak to anyone in a Residents' Association about any issues that have been raised about green spaces or new buildings in our community.**

- **We would also love to hear your views on the environment – particularly whether you would support a plan to make our villages free of single-use plastic.**





## News from Stanstead Abbots Parish Council

We would like to wish the Vicar a very happy and fulfilling retirement and to thank her for all of the energy, determination and enthusiasm she has demonstrated in her work improving life for all in the parish. Anne has been easy to spot as she has cycled around in her clerical garb and we all know we are in for a friendly greeting when she sees us. We shall miss her very much as a friend, but so much also as an advocate and supporter for the many and varied issues which she has so ably helped with.

**News** - some of us have been involved in discussions about speeding, parking and polluting with the officers who need to know the problems so that something can be done. Watch out for some improvements soon - and in particular, watch out for new lamp-posts in October!! Many thanks to County Councillor Eric Buckmaster for his decision to spend so much of his highways allowance on Stanstead Abbots!!

## Stanstead Abbots, St Margarets and The Folly Neighbourhood Plan

August has been a less busy month than usual but the Steering Group will have met in September after this magazine has gone to print with updates under the various topics covered by the sub-groups - in particular Heritage have been busy producing a report and a draft policy; Ecology have done tremendous research and will be telling us which green sites they propose to protect and the Design Team have been out and about completing their character assessments.

We shall be able to include details such as the distance between houses, how many and how high in particular spaces and so on. If you would like to have a say we should love to hear from you: do please get in touch through our website:

<https://www.stansteadabbotsneighbourhoodplan.uk/>.

*Julia Davies, Chairman, Stanstead Abbots,  
Stanstead St Margarets and the Folly Neighbourhood Plan.*



Stanstead Abbots  
St Margarets





## APPENDIX 13



The flyer features a decorative header with a green background and a blue wavy line. The main title 'Neighbourhood Plan' is in a green serif font, and 'Webinar' is in a large, bold black sans-serif font. Below the title is a circular logo with a white bird in flight over green reeds and a blue wave. To the right of the logo, the text 'Recap, Update & Proposed Sites' is in a green sans-serif font. A paragraph of text follows, and the date 'Monday 1st March, 8-9pm' is in a white sans-serif font on a green background. At the bottom, the registration email is provided in white text on a green background.

Neighbourhood Plan

**Webinar**

Recap, Update & Proposed Sites

We would like to share with you our journey so far before presenting the sites for housing that the NP would like to designate within the plan. There will be time for Q&A.

**Monday 1st March, 8-9pm**

Register for Webinar by emailing: [sa.neighbourhoodplan@gmail.com](mailto:sa.neighbourhoodplan@gmail.com)

Stanstead Abbotts  
St Margarets

Flyer advertising the Webinar which is available on the SASMNP website



## APPENDIX 14

Informal Meeting Notes: 22nd May 2021 – 2.30pm

Netherfield Lane Field

### ▪ In Attendance:

Julia Davies (SAPC & NP Steering)	Maria Tasker Liam Tasker Mr & Mrs Foreman	Mr & Mrs Theobald Ms P Lovie Ms C Stevens
Mike Dormon (SAPC & NP Steering)	Mr K Baker Mr J Walford	Mr & Mrs Raynes Mr & Mrs Robinson
Sarah Chapman (SAPC & NP Steering)	Mr & Mrs Bridgeman Ms V McPherson (Alms Houses)	Mr M Robinson Mr & Mrs Johnson
Paul Breach (SAPC)		Mr & Mrs Bean
Clare Maynard (SMPC & Steering)	Ms A Clark (Alms Houses)	Mr & Mrs Shepherd

**Purpose of the Meeting:** To listen to the views of the Netherfield Lane Residents regarding the Websters Proposals

- Mrs Robinson asked for the meeting to be recorded. It was advised that notes would be taken for the informal discussion, but we would not be filming/recording, as we do for our more formal neighbourhood planning formal meetings. Mr & Mrs Robinson asked whether they were able to record this via their mobile. The group were asked if there were any objections and there were none.
- A resident commented that they did not want building on the field but had been told that if there was no neighbourhood plan that they would still have a say, is this correct? The resident declined to comment who had told them this. We advised that no neighbourhood plan meant that there was less protection from developers and EHDC could potentially look for more dwelling numbers. A plan enables protection not just from the number of dwellings but design of new builds, protected views and community assets etc. Julia Davies gave a brief overview of how the neighbourhood plan came about following a meeting with the then District Councillor & EHDC who strongly advised that one was created. The problem was that we are covered by a lot of green belt and flood zone 3 so we were very restricted on potential sites within the neighbourhood plan boundary.
- It was made clear that the Brownfield Site (Websters units) is actually in the Greenbelt and by not including the field will make it very vulnerable in the future if it's not brought into the plan, as it will be surrounded by homes. Three years ago, the Websters planning application was turned down due to no employment opportunities and therefore their revised plans had to include units. This is why no more housing could fit onto the brownfield site.



- Would putting trees on the field stop building? This would not stop development unfortunately.
- It was noted that Mr Webster Senior loved the field and would not have wanted anything to be built on it. Also, that Mr Fuselli told the residents that he would not build on the field. This would be raised with Mr Fuselli for further comment. **(Action)**
- The plan was reviewed and there is concern over the entrance opposite the garages. If turning this into a cul-de-sac, it would omit two homes and there would be a loss of four courtesy parking spaces. The entrance should be placed further down the Lane to prevent this. It was agreed we would talk to Websters. **(Action)**
- Would there be a loss of house pricing if there is a loss of parking? Prices of housing is usually affected by demand, but we cannot categorically confirm whether a home's value would reduce due to the loss of 'courtesy' parking. However, as with the action point above, we will talk with Websters regarding their plans.
- It was suggested that LVRP release some of their land to accommodate parking for visitors such as dog walkers & fishermen to their land, as they have in Marsh Lane. A lot of cars that park along Netherfield Lane, are those using the LVRP. This was a valid suggestion and one that we would speak to LVRP about **(Action)**
- Traffic calming is required on Roydon Road where it's very dangerous, especially the turning into the Lane. All agreed and this is an action point for the Transport Group to take up with EHDC & County Councillor. The group were advised that there had been various meetings with EHDC about parking and speeding etc. Surveys continue to be carried out and where EHDC advise that there are no issues in the village, that this is something we disagree with and continue to raise with them. **(Action)**
- How many affordable homes were there planned for Websters site? It was advised that this would be approx. 40% which equates to 24 dwellings. It was also advised that if the field was brought into the plan, that the Baesh Trust would work with the developer for 6 community homes to be built. These would be for local people and members of the Baesh Trust. The Chapelfield site would produce 7 affordable homes. It was pointed out that the Catesby site offer is very attractive and would offer more affordable homes. It was made clear that the informal meeting was being given to local residents to discuss the Netherfield Lane issues and was not about other sites. The discussion became heated and a temporary halt to the meeting was introduced to allow calm and respect to be restored.
- It was noted that there is no provision to have affordable on one site. Our priority currently is to find sites.



- A question as to whether a meeting at the Catesby Site or other sites could be offered? There were no plans to hold further informal discussions at other sites but that this will be taken under due consideration (**Action**)
- The residents were told that Websters are willing to sign a covenant that confirms they will not build more dwellings than their plans state if this provides some reassurance to those who feel once the application is approved, that more dwellings would then be built.
- The number of homes were reviewed. On the Brownfield Site there are 20 homes, so this leaves approx. 39 short. The call for sites was mentioned and we advised that The Thames Water site could provide 10 homes and Marsh Lane approx. 20. The BT site is not an option and another site brought forward is in flood zone 3, so is also not possible. Residents felt that the Marsh Lane site was a good option if LVRP agreed to provide the required numbers.
- We were asked whether LVRP had responded to us about the sites in their area, which to date they have not. Whilst the Websters site also sits in the LVRP, access to Netherfield Lane is not a main point of entrance to their facilities, as is Marsh Lane. We will be chasing them however for their responses.
- Drainage issues – We are aware there is a main sewage pipe through the centre of the field and that drainage/flooding was on Websters radar. As part of our consultation process, we have to ask various authorities to look at our proposals. LVRP being one. If they oppose our plans, we will need to go back to the drawing board.
- What about the current District Plan review and the numbers? We advised that all District Plans were being reviewed and that it was most definitely likely that the number of dwellings would increase in the plan, which is why adopting a NP was so important.
- Views and vistas are important and that the view of the field would be lost due to a housing estate from a main road. We said that this could also be argued for the sites known as The Granary, The Spinney and the ‘Hobbit’ Houses, which sit on the busy Hoddesdon Road.
- The owner of the house on the main road (Cat Hill) advised that his garden is 6ft lower than the field and every 6 weeks they have to clear the sewage drainage. There is concern whether this would be seriously affected by potential future building? There is no building planned on the incline where the garden overlooks the field but would be something we can raise with Websters (**Action**)
- Residents thanked the group for giving their personal time to listen to the concerns and views of the Netherfield Lane residents. The group thanked the residents and asked that we continue to talk to each other whilst we go through this process.



Nothing further was discussed, and the meeting was concluded.

Julia Davies also received some helpful points in messages prior to the meeting and afterwards:

1. A resident of the Baesh Almshouses is unhappy about being overlooked and also losing the wildlife which she enjoys seeing in the current field.
2. From a resident of Roydon Road – concerns that the land on the sloping area of the field is unstable and not good for construction – heavy clay which moves as they have personally experienced.
3. Only as small amount of green belt as possible should be released.
4. Hedges should be retained where possible especially between the sites to maintain bird habitats – especially by the right-of-way track behind the Roydon Road houses.
5. Safety of walkers along Netherfield Lane is a concern if more traffic is generated by the housing and also employment. There are fears about the visitors parking where the road is narrow. Since Covid and the closure of the employment site many walkers have enjoyed that route.
6. Could the LVRP provide extra parking spaces?
7. There is a strong feeling that there should be no charging points as this would encourage extra traffic rather than being of help to immediate residents.
8. Previously there was very little traffic outside office hours.
9. A suggestion about off-grid power for EV charging – see Electric Vehicle Charging – AFC Energy.
10. Moving the junction between the new road beyond the garages – the current proposal is hazardous partly because of parked cars
11. Not having Junction A would improve the visual aspect for the current houses
12. Water run-off is a concern – might not just sit on the lane but flow into houses if there is no barrier.



## APPENDIX 15

ARTICLE WRITTEN FOR THE THREE VILLAGES MAGAZINE PUBLISHED IN MARCH 2023

### The Stanstead Abbots and St Margarets Neighbourhood Plan

The Neighbourhood Plan, which has been put together by volunteers over the last six years, has finally reached the pre-submission consultation stage otherwise known as Regulation 14. Responses received during the consultation period must all be considered and responded to. It is possible that in the light of comments submitted the draft plan will be modified. The consultation lasts for 8 weeks, February 6th to April 2nd.

The main interest for residents is the policy which includes the proposed sites for development and in particular the site which is both brownfield and green belt. The East Herts Local Plan defined the settlement area of Stanstead St Margarets and Stanstead Abbots combined with the Folly, the southern section of Amwell Lane and Rivermeads from Great Amwell, as a Group one Village Æ—which means it has to increase the housing stock by 10%. It has therefore been necessary for the Steering Group to very reluctantly include an area of green belt as part of one housing site. This will be protected from any development beyond that stipulated in the Plan by a covenant.

There are other policies in the document which we would like to receive comments on. There are lists of community assets, green spaces and favourite views which need to be protected. There is much about conservation of both our heritage and the natural environment. There is a section on business, another on the riverside and another on transport.

Once the Regulation 14 Consultation has closed and the responses all logged and commented on, the plan will be submitted to East Herts Council. When the council is satisfied that the Steering Group has met its obligations it will organise the Regulation 16 Consultation which tests whether it meets the Basic Conditions and is in fact capable of becoming a legal document. Responses may again be made by residents.

Following this second formal consultation the draft plan will be looked at by a planning inspector. Once he or she has approved the Plan the final stage will be the Referendum. All those on the electoral register who live within the designated area – that is the whole of Stanstead St Margarets, Stanstead Abbots and those parts of Great Amwell referred to above – will be able to vote in favour of adopting the plan or not in favour. If more than half of those who vote in the referendum approve of the plan and it is consequently adopted, it would be extremely difficult for any development to occur before 2033 that is not set out in the plan.

The purpose of the Neighbourhood Plan is to protect the villages from more development than that 10% imposed on us by East Herts Council and to contain it, so that there won't be opportunities for developers to chip away at the green belt outside the settlement areas and create coalescence with neighbouring towns.

If you haven't responded yet – please send your comments to

[www.stansteadabbotsneighbourhoodplan.uk](http://www.stansteadabbotsneighbourhoodplan.uk)

Or email:

[sa.neighbourhoodplan@gmail.com](mailto:sa.neighbourhoodplan@gmail.com)

You may prefer to use the form printed on the back of the leaflet which will have been delivered to you if you live within the designated area.

Julia Davies,

Chairman, Stanstead Abbots and St Margarets Draft Neighbourhood Plan





## APPENDIX 16

**From:** [juliadavies](#) <[REDACTED]>  
**Sent:** Thursday, February 29, 2024 11:11 AM  
**To:** Nicholas Buxton <[REDACTED]>  
**Cc:** 'Mike Dormon' <[REDACTED]>  
**Subject:** Neighbourhood Plan

Hi Nicholas,  
I hope you have what you need now for understanding the issue of the Designated Local Green Spaces.

Would you be able to confirm that you are happy for us to include the allotment sites which I understand you own. They are clearly very popular with villagers.

Thank you very much for your support,  
Julia

**From:** Nicholas Buxton <[REDACTED]>  
**Sent:** Sunday, March 3, 2024 10:04 PM  
**To:** juliadavies <[REDACTED]>  
**Cc:** 'Mike Dormon' <[REDACTED]>  
**Subject:** RE: Neighborhood Plan

That's fine, Julia. I have now had a chance to read through those sections, and I have no objection to both Church and Townmead allotments being designated as you describe.



Nicholas Buxton

**From:** [juliadavies](#) <[REDACTED]>  
**Sent:** 18 February 2024 15:50  
**To:** [Mike Dormon](#); [Tom BTmail](#); [Clare Maynard](#)  
**Subject:** Local Green Spaces

Dear All,

As Chairmen of the three Parish Councils – namely Stanstead Abbots, Great Amwell and St Margarets – which have ownership and stewardship of the St Margaretsbury Recreation Ground, Station Road, Stanstead Abbots, I want to make you aware that St Margaretsbury Recreation Ground has been put forward in the Stanstead Abbots and St Margarets Neighbourhood Plan as a designated Local Green space. This means that it would be protected from development unless any maintenance or preservation of the space is required which would contribute to its enhancement or appreciation and where it is consistent with the National Planning Policy Framework.

More information may be found in the draft plan which is on the Stanstead Abbots Neighbourhood Plan website [Stanstead Abbots Neighbourhood Plan](#)

I should be grateful if you would pass this information on to your fellow Trustees and send me confirmation that this is acceptable to you.

Many thanks,  
Julia Davies

Chairman, Stanstead Abbots and St Margarets Neighbourhood Plan Steering Group

**From:** Tom BTmail <[REDACTED]>  
**Sent:** Sunday, February 18, 2024 4:33 PM  
**To:** juliadavies <[REDACTED]>  
**Cc:** Mike Dormon <[REDACTED]> Clare Maynard <[REDACTED]>  
**Subject:** Re: Local Green Spaces

Hi Julia

As a Trustee I support the proposal to designate the Recreation Ground as a designated Local Green Space.

I will forward your note to the other GAPC Councillor who is a Trustee and he will respond for himself.

Tom.



**From:** Peter Troughton <[REDACTED]>  
**Sent:** Monday, February 19, 2024 8:44 AM  
**To:** juliadavies@[REDACTED]  
**Cc:** [REDACTED]; [REDACTED]  
**Subject:** Local green space.

Dear Julia,

As the second Trustee nominated by GAPC I fully support the proposal in the Neighbourhood Plan to designate The St.Margaretsbury Recreation Ground as a Local Green Space.

Peter

**From:** Clare Maynard [REDACTED]  
**Sent:** Monday, February 19, 2024 9:22 PM  
**To:** juliadavies@[REDACTED]; Mike Dormon <mdormon@stansteadabbottsparishcouncil.gov.uk>; 'Tom BTmail' <[REDACTED]>  
**Subject:** RE: Local Green Spaces

Julia,

Confirm this is acceptable on behalf of St Margaret's PC.

Regards  
Clare





Julia Davies  
Chairman  
Stanstead Abbots & St Margarets  
Neighbourhood Plan Steering Group,  
Stanstead St Margaret's Parish Council

Email: [cmartin@leevalleypark.org.uk](mailto:cmartin@leevalleypark.org.uk)  
Direct Dial: 01992 709885

Via email to [stansteadstmargaretspcclerk@gmail.com](mailto:stansteadstmargaretspcclerk@gmail.com)

24 March 2023

Dear Julia

**RE: CONSULTATION ON THE STANSTEAD ABBOTTS & ST MARGARETS  
DRAFT NEIGHBOURHOOD PLAN - LEE VALLEY REGIONAL PARK AUTHORITY  
COMMENTS**

Thank you for consulting the Regional Park Authority on the draft Stanstead Abbots and St Margarets Neighbourhood Plan (SASMNP). A report on this matter was considered by the Authority's Members, at the Lee Valley Regeneration and Planning Committee on the 23rd March 2023, when the following comments were agreed.

**Draft Neighbourhood Plan**

**Vision and Objectives**

The Authority supports the vision and objectives for the Stanstead Abbots and St Margarets Neighbourhood and welcomes the emphasis placed on enhancing the natural environment, protecting local heritage and the neighbourhood's countryside setting whilst also seeking to improve existing community facilities for recreation and leisure and meet needs in terms of housing and employment opportunities.

Stanstead Abbots and St Margarets are attractive villages located within and adjacent to the Regional Park and there is an important relationship to foster between the Park and the local communities. The proximity of the Regional Park, its landscape, open spaces, wildlife and range of walking/cycling routes offer a variety of leisure and recreational opportunities both locally and further afield which bring benefits to the health and well-being of the communities and the economy of the local area. Stanstead Abbots and St Margarets provides important facilities and services both for those visiting the Park, and for regular users.

The Neighbourhood Plan is an important mechanism through which to identify joint objectives that will meet the requirements of both the SASMNP Steering Group and the Authority in terms of protecting the Regional Park, its green spaces, landscape character and wildlife whilst also supporting the delivery of PDF Area proposals.

## **Lee Valley Regional Park and the Park Development Framework**

It would be helpful therefore if the SASMNP included more detail about the Regional Park and made reference to the remit of the Authority and the Park Development Framework as it relates to the Neighbourhood Area, (the Area 8 Proposals 'The Upper Valley Rye Meads to Ware'). This detail could be included as part of the context to the designated Neighbourhood Plan area and in the supporting text to relevant policy topics such as the Natural Environment, Nature Conservation, Leisure and Tourism. Site Allocations in particular H3 'Land to the east of Netherfield Lane' should also include reference to the Regional Park and PDF where they are located within or adjacent to the Park. The Regional Park is a statutory designation of relevance within East Herts District and part of the policy context when considering the future of these sites. Officers would be willing to engage further with members of the Steering Group on this matter in due course if this would be helpful.

## **Housing**

### **Site Allocation H3**

The Authority notes the detailed evidence gathering undertaken, local engagement and assessment of options that underpins the housing allocations within the SASMNP. There is concern however that the site allocation H3 'Land to the East of Netherfield Lane' proposes a substantial residential development within the Regional Park and the Green Belt and that to accommodate this the SASMNP policy proposes removing site H3 from the Green Belt.

It is understood that the SASMNP is seeking to identify sufficient allocations for housing development to meet the 10% increase identified for Group 1 Villages by the EHDP. There is an added requirement to source sites of sufficient size to ensure provision for affordable housing to provide for local needs. Hence the allocation of H3 which combines an existing permitted development on a brownfield site with the open fields adjoining in order to provide an area of sufficient size for a range of housing provision including 40% affordable units.

However it is not clear whether the SASMNP has taken into account the Regional Park designation in applying this allocation, or the implications of the development in terms of the Regional Park, its landscape character and recreational role, and the PDF Proposals. The only reference sits within supporting text and this mentions the need to mitigate adverse impacts from development on the surrounding Lee Valley Park by preserving "as much of the existing hedgerow and treeline as possible".

It should be noted that East Herts District Plan policy is supportive of the Lee Valley Regional Park and the Park Development Framework (PDF), Policy CFLR51. In particular, the District Council seeks to support and work with the Park Authority and other stakeholders to deliver the PDF Area Proposals where these improve leisure and sporting opportunities for local communities, enhance access to open space and nature, and help expand educational, volunteering and health related activities. PDF Area proposals 8. A.1 seek the protection, restoration and enhancement of existing habitat potential throughout the area and promote joint working with other landowners to improve ecological connectivity, along the waterways and between key sites such as Stanstead Innings and land to the east, for example the Ryegate Farm area. Proposals also seek to maintain and improve pedestrian and cycle access between Rye Meads and Stanstead Innings and ensure provision for horse riders are maintained; this would be along Netherfield Lane. Landscape Strategy Proposals aim to strengthen the strong rural character of this landscape character area (G1 River Terraces with Farmland) by retaining existing and encouraging the



replanting of hedgerows, managing and extending the existing small wooded areas for their diversity so as to retain the wooded skyline to the valley floor.

Policy SASM H3 would result in built development intruding further into the largely rural valley sides which form an important part of the Park's landscape character and contribute to people's enjoyment of the rural valley landscape. As land rises to the east from Netherfield Lane, development is likely to feature prominently in views out towards the north and east. The woodland and vegetated boundaries along the field edges also have direct connectivity with the woodland and scrub habitat edge to Stanstead Innings and therefore have value in terms of the wider ecology of the area. Development even if screened and well-designed will impact upon the wider Park area by reducing the connectivity of habitats, introducing light and noise pollution and increasing vehicular movements along Netherfield Lane, a route that is well used by pedestrians and cyclists and is a designated bridleway. Development is also likely to create an increase in visitor pressure on Stanstead Innings which would also be a concern as this area is functionally linked to the nearby Lee Valley SPA (Rye Meads) and provides habitat for Bittern, Gadwall and Shoveler noted in the SPA citation. **The Authority would ask the SASMNP Steering Group to reconsider this designation in the light of the above concerns.**

**Site Allocation H4** is noted, this is also land within the Regional Park (and owned by the Authority), although in this case it lies outside the Green Belt forming part of a developed site currently part of the Lee Valley Marina, Stanstead Abbots. The Authority acknowledges that the site also sits within the village settlement area and although within flood zone 2 may have potential for a small residential development. There are a number of constraints in relation to a residential redevelopment of this site however and these have been identified on the site allocation pro-forma. In the past officers have identified the potential of this site for development, including residential, when considering the Marina operations and the Neighbourhood Plan reflects this process. However at this time the site allocation consists of land and buildings required for Marina operations and release of the site for redevelopment will be a matter for future consideration.

### **Riverside and Heritage**

The inclusion of policy for the riverside and water related environment is welcome. Policy SASM R1 'Riverside Development' highlights the many and competing demands placed upon the riverside especially when development is proposed alongside or adjacent to the river. It is difficult to achieve a balance between these competing demands and the pressures they bring. Policy R1 should consider the ecological significance of the river and waterside environment and how impacts from development and associated uses can be avoided or minimised. The riverside environment often acts as a wildlife corridor and connecting habitat between other waterbodies and habitats - it is a key habitat along the length of the Regional Park for example. Key factors that impact here are light pollution from waterside development, increased noise and disturbance across extended time periods, and increased traffic movements.

As well as the river, waterbodies within the Regional Park area have importance for biodiversity both in relation to designated and local sites of importance for nature conservation and in terms of their role as a visitor attraction – the water bodies and associated open space at Stanstead Innings for example, provide a popular site where people can get close to nature and enjoy wildlife throughout the year and accommodate a local sailing club.



Policy SASM R2 sets out guidance for moorings and floating structures to ensure these do not detract from the character and openness or views of the river and to ensure they do not interfere with recreational and commercial use of the river. Recreational moorings are supported in the Park and contribute to the visitor experience. Policy R2 criteria are endorsed; they provide a similar framework to that set out within the PDF Area Proposals. Proposal 8.A.2 'Visitors' identifies "opportunities for recreational visitor moorings and boating focal points to be developed at Ware and Stanstead Abbots. Recreational moorings and support facilities to be improved where the location, scale, design and landscaping does not adversely affect the amenity of the area. The development of linear residential moorings to be avoided." Permanent residential moorings are more appropriately located off line and outside the Park where provision for parking and other services can be included without detriment to the waterside environment its accessibility and visitor enjoyment of the wider Park.

### **Heritage**

The detail and scope of the SASMNP section on Heritage Assets is welcomed. Rye House Gatehouse Scheduled Monument falls within the Neighbourhood Plan area and is identified as a heritage asset and this is supported. Area Proposals within the PDF seek to promote joint working with Historic England and other stakeholders to preserve and enhance the heritage value and interest of the Rye House Gatehouse its setting and moat.

The objective to raise awareness and provide accessible information about the significance of heritage assets in the area (Objective F) should be carried through into policy. For example Policy SASM HA1 could include awareness raising as an additional process for development to embrace as part of proposals to assist in protecting and enhancing heritage assets. Consideration should also be given to the importance of the industrial heritage of the Navigation and the wider Lea Valley, a key feature of the Regional Park.

The importance attributed in the SASMNP to views and vistas and their contribution to landscape character and the setting of heritage assets is to be welcomed. A number of those included are views across the Regional Park and along its boundaries. Two are identified looking along the River Lee Navigation upstream and downstream from the bridge over the Navigation in the High Street. The Authority would seek the inclusion of an additional view both out to and from the rural valley sides to the east. The Lee Valley Regional Park Landscape Strategy notes as a key characteristic for Landscape Character Area G1 'Ryegate Farm/Terbets Hill' the importance of "Long views from the valley slopes across open bodies of water and wetlands within the Lee Valley floor.." and also the importance of this area (which includes the landscape east of Netherfield Lane) as a rural backdrop and skyline in views from the floodplain.

### **Natural Environment**

The Authority endorses the SASMNP objectives which aim to protect the natural environment particularly the landscape character of the natural floodplain of the Lea Valley and the countryside setting of Stanstead Abbots & St Margarets. This is the same landscape and natural environment that underpins the Regional Park where the biodiversity value of the landscape has been recognised through national and international designations as well as locally important designations. Policy to protect

these designated sites is to be welcomed especially where this complements the Local Plan Policy.

It is suggested that the SASMNP includes a plan mapping the various nature conservation sites given the significance of these designations and the value of Local Wildlife Sites such as Stanstead Innings.

Policy on Nature Conservation SASM NE2 is supported. Measures to deliver BNG as outlined in the Policy should however also be informed by the Authority's BAP and the work of the Authority at Stanstead Innings. This is a good example of habitat creation and enhancement that serves both wildlife and people. The SASMNP should also consider how other areas of open space and water act as buffers or supporting habitat for the Lee Valley SPA/Ramsar site, and the interconnectivity of the landscape. This will help to inform BNG should off site provision be required and contributions sought for their future management. The PDF Area Proposals also identify a number of actions and projects in relation to biodiversity and habitat enhancement as well as measures to improve access to nature. These should be considered by the SASMNP Steering Group and supported where appropriate.

Policy on valued hedgerows and trees is noted and supported (SASM NE3). The Lee Valley Regional Park Landscape Strategy has identified the importance of retaining existing hedgerows and encouraging the replanting of hedges along historic field boundaries using locally indigenous species. This is considered important in order to retain the function of areas of the Park to the east, which also form the eastern boundary of the Neighbourhood Plan area, as a rural backdrop and wooded skyline for the Park and wider Lea Valley. Landscape Proposals also suggest that the parkland history of land to the east of Netherfield Lane should be considered together with "opportunities to perpetuate the parkland character with specimen trees in new planting".

Measures to protect and prevent the degradation of the flood plain are supported. Policy SASM NE4 mentions the need for development to include an undeveloped buffer of 5 metres from the top of waterways banks, this should be at least 8 metres in order to meet EA requirements and provide ecological benefits.

### **Leisure and Tourism Policy**

The Authority welcomes the policy support set out under Policy SASM B4 for the development of leisure and tourism related uses that will help deliver the PDF Area 8 Proposals. The specific reference to the Stanstead Marina and its role in supporting recreational use of the waterways is also welcomed.

The need for tourist accommodation within the area identified by the Neighbourhood Plan evidence gathering process is noted. Policy SASM CL4 New Facilities suggests the location of new tourism accommodation should be in the village and SASM B4 II refers to support for overnight stay accommodation in association with leisure uses and social and educational functions. Visitor accommodation is a matter that falls within the remit of the PDF and there may be scope in the future for visitor accommodation in the Regional Park within the wider area of the Neighbourhood Plan. The Regional Park currently includes a range of overnight accommodation from camp sites and lodges, a youth hostel and, as referenced in the SASMNP, hotel provision at Roydon Marina & St Margaret's NP. The SASMNP should consider the benefits of widening the locational scope for the provision of new visitor accommodation. There

could be scope for the Authority and the SASMNP Steering Group to explore this further with other relevant stakeholders in the future.

The many walking and cycling routes within the northern section of the Regional Park offer opportunities for the SASMNP area and supporting text in the Leisure and





Community Facilities section references that a number of walks are available with links through into the valley. PDF Proposals identify opportunities to improve footpath and cycleway links into the Park, for example along Marsh Lane and from St Margarets station and to promote circular routes linking to PRow outside the Park boundary. It would be appropriate for Policy SASM B4 to support proposals for improvements to footpaths and cycleways within the Regional Park, particularly at key entrance points into the Park at Marsh Lane and Netherfield Lane and to promote connections through onto the Lea Valley Walk and Lee Valley Pathway from St Margarets Station.

### **Transport**

The Authority supports the policy emphasis on protecting the village from unacceptable increases in traffic volume and traffic movements through the village and the need to maintain the safety of pedestrians and cyclists. The safety of visitors to the Park should also be considered; they are likely to be moving on foot or bicycle along the High Street as well as crossing between the station and the Park's entrance points. It is important to ensure safe crossing points across the High Street particularly at key interfaces, for example where the riverside towpath connects with the High Street. Policy SASM T1 which seeks to protect PRow is supported.

### **Implementation**

The Authority notes that the Neighbourhood Plan will be primarily implemented through the determination of planning applications by the Council and that Plan policies provide criteria against which planning applications are assessed. Appendix J to the SASMNP includes a draft Action Plan which outlines some of the initial spending priorities identified by the community as a result of the Neighbourhood Plan process. The resource/cost implications of the priorities included in the Action Plan are largely unknown or awaiting further detail and the priorities are mainly focused on transport, community and heritage related actions.

There is scope to include other priorities, for example relating to the natural environment, particularly where there are concerns that development proposals are likely to impact on designated sites or locally important habitats and green/water spaces. Should future development impact negatively upon the Regional Park, the Authority is likely to request S106 contributions for any mitigation works required, in line with the PDF Area Proposals. It will therefore be useful to consider whether any of the PDF proposals support or could inform local spending priorities to secure improvements to the natural environment and accessibility of the Stanstead Abbots & St Margarets Neighbourhood area and Regional Park. This could be another matter for future discussion between the Authority and the SASM Neighbourhood Steering Group.

The Authority looks forward to engaging further with members of the SASM Steering Group on the matters raised above prior to the next stage of the Neighbourhood Plan process.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Claire Martin', written in a cursive style.

Claire Martin  
**Head of Planning**

## Appendix 18

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**From:** [juliadavies@stansteadabbotts.co.uk](mailto:juliadavies@stansteadabbotts.co.uk) [redacted]  
**Sent:** 18 February 2024 16:50  
**To:** Gardner, Simon [redacted]  
**Subject:** [EXTERNAL] Stanstead Abbots and St Margarets Neighbourhood Plan

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Simon,

I believe that you are currently secretary of the St Margaretsbury Management Company which manages the St Margaretsbury Estate, Station Road, Stanstead Abbots. I would appreciate it if you would make the estate-owners aware that an area of this land has been put forward in the Stanstead Abbots and St Margarets Neighbourhood Plan as a designated Local Green space. This means that it would be protected from development unless any maintenance or preservation of the space is required which would contribute to its enhancement or appreciation and where it is consistent with the National Planning Policy Framework. The area in question is woodland adjacent to the New River from Station Road south to the point where there is the edge of a football pitch to the West.

More information and a map may be found in the draft plan which is on the Stanstead Abbots Neighbourhood Plan website [Stanstead Abbots Neighbourhood Plan](#)

I should be grateful if you would pass this information on and send me confirmation that this is acceptable.

Many thanks,  
Julia Davies  
Chairman, Stanstead Abbots and St Margarets Neighbourhood Plan Steering Group

**From:** Gardner, Simon [redacted]  
**Sent:** Thursday, February 22, 2024 9:16 AM  
**To:** [juliadavies@stansteadabbotts.co.uk](mailto:juliadavies@stansteadabbotts.co.uk) [redacted]  
**Subject:** RE: [EXTERNAL] Stanstead Abbots and St Margarets Neighbourhood Plan

Hi Julia,

I have shared the below with the rest of the estate and we're in agreement that your proposal is acceptable

Thanks  
Simon

St Margaretsbury Management Co.

**From:** [juliadavies890@btinternet.com](mailto:juliadavies890@btinternet.com) <[juliadavies890@btinternet.com](mailto:juliadavies890@btinternet.com)>  
**Sent:** Wednesday, February 21, 2024 11:56 PM  
**To:** 'Anna Osborne' <[Anna.Osborne@eastherts.gov.uk](mailto:Anna.Osborne@eastherts.gov.uk)>  
**Subject:** Local Green Spaces

Hi Anna,

The Stanstead Abbots and St Margarets Neighbourhood Plan has gone through the Regulation 14 Consultation and I am now tying up some of the loose ends before we submit it to East Herts for Regulation 16.

There are some sites which we are proposing to put forward as designated Local Green Spaces which I believe belong to East Herts. It would be good to know that East Herts would support their inclusion.

1. The Meadow behind the car park off the High Street
2. The grassed areas between Lawrence Ave, Rush Close and Heron Close and the River Lea Navigation
3. A wooded area alongside Station Road and Northwards beside the New River on the Folly Estate known as Folly Grove.
4. An area whose ownership is uncertain – the Community Ward on Hoddesdon Road next to the New River and the A414 viaduct.

I should also like to mention that following the Regulation 14 consultation and a tightening up of Environment Agency rules regarding building in Flood Zones 2 and 3 we are not planning to put the garage site in Amwell Lane forward as a housing site.

You can find more information on our website.

Best wishes,  
Julia Davies,  
Chairman,  
Stanstead Abbots and St Margarets Neighbourhood Plan

**From:** Anna Osborne <[Anna.Osborne@eastherts.gov.uk](mailto:Anna.Osborne@eastherts.gov.uk)>  
**Sent:** Wednesday, March 6, 2024 9:29 AM  
**To:** [juliadavies890@btinternet.com](mailto:juliadavies890@btinternet.com)  
**Subject:** RE: [External] RE: Local Green Spaces

Hi Julia,

Apologies for the delay in replying to you.

In general I don't think I have any objections to the sites you have proposed. I have asked Laura Guy a couple of questions about possible designation so will respond fully to you once I have heard back from her.

Regards



**Anna Osborne**  
Asset & Estates Manager  
East Herts District Council  
01992 531663  
[www.eastherts.gov.uk](http://www.eastherts.gov.uk)



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## **Appendix 19**

### **Stanstead Abbots and St Margarets Neighbourhood Plan Revision Consultation: January – February 2023**

#### **General Comments:**

East Herts Council welcomes the opportunity to comment on the emerging Stanstead Abbots and St Margarets Neighbourhood Plan and is broadly very supportive of the emerging Neighbourhood Plan. The Parish Council and the Neighbourhood Plan Group are commended on their hard work to date.

The Stanstead Abbots and St Margarets Neighbourhood Plan presents a positive planning document that seeks to shape development and is responding to the strategic priorities in the development plan in a pragmatic way. It is recognised that the neighbourhood plan area has significant constraints, providing a challenging context for the Neighbourhood Plan Group. The Council consider the plan is generally very well-written, well-evidenced and the policies are locally specific. The Council particularly supports the proactive approach taken to analyse, protect and enhance local character.

Some further work is still necessary to review the draft to ensure the NP is in conformity with the District Plan (2018), and compliant with the National Planning Policy Framework (NPPF) and the other Basic Conditions, particularly in the following areas:

- Clarity is needed around the housing strategy and how the Neighbourhood Plan will meet the housing need.
- Housing allocations need more clarity and evidence to ensure they are both suitable for housing and deliverable during the plan period.
- More evidence/ explanation is needed to demonstrate compliance with national policy in relation to flood risk.

- The deliverability and effectiveness of some of the policies need to be reviewed, to ensure they meet the basic conditions and provide the decision-maker with a clear framework in which to operate.

Once work has been undertaken to review the document following receipt of comments through this consultation, East Herts officer's welcome the opportunity to talk to the Neighbourhood Plan Group and work through any issues or modifications subsequently prepared particularly in relation to the comments below.

It should also be noted that there is a legal requirement for public bodies to ensure documents on their website meet accessibility requirements. Therefore, in order for East Herts Council to publicise the submitted plan as part of the regulation 16 consultation it will need to be accessible, as explained in national guidance:

<https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps>.

<b>Section/ Objective/ Policy</b>	<b>Page No.</b>	<b>Comment</b>
<b>General Comments</b>		
		<p>The Council welcomes the opportunity to comment on the development of this Neighbourhood Plan and commends the Parish Council on a well-evidenced and positive document, with locally-specific and concise policies.</p> <p>As you are no doubt aware, the Government is currently consulting on revisions to the National Planning Policy Framework (NPPF), with the intention to publish changes by spring 2023. As such it will be important to update the NPPF paragraph references in the submission version of the Neighbourhood Plan, as required.</p>
<b>1. Introduction</b>		
<b>Para 1.4</b>	6	Refers to the NPPF 2019, but the latest version is currently 2021.
<b>3. Housing</b>		
<b>Policy SASM H1 Village and Green Belt Boundary</b>	17	<p>The Council supports the principle of reviewing the Green Belt boundary. District Plan Policy VILL1 justifies the exceptional circumstances for amending the Green Belt boundary at Stanstead Abbots and St Margarets to accommodate the district's housing strategy. As outlined in paragraph 3.8, the NPPF enables Neighbourhood Plans to review Green Belt boundaries. Therefore, the Council welcomes Criteria I of this policy.</p> <p>However, it is suggested that Criteria II of the policy is deleted. It outlines that appropriate development in the Green Belt will only be permitted where it does not result in physical or visual coalescence or undermine the separate character, appearance and identity of</p>



Section/ Objective/ Policy	Page No.	Comment
		<p>Stanstead Abbots &amp; St Margarets. This approach essentially sets out additional restrictions to proposals for ‘appropriate’ development to that outlined in the National Planning Policy Framework. This approach is not in conformity with District Plan Policy GBR1 Green Belt, which states that planning applications in the Green Belt should be considered in line with the provisions of the NPPF.</p> <p>If there is concern that the existing national and district planning policy does not sufficiently protect the separate character, appearance and identity of Stanstead Abbots and St Margarets, then it is suggested that policies relating to design or landscape are used to address this instead. The Council will be happy to advise on the development of such policies.</p>
Para 3.11	16/17	<p>The second sentence of this paragraph does not make sense and needs amending or deleting: <i>‘To preserve the integrity of the Green Belt boundary as much a site large enough to provide the remainder of the allocation for the neighbourhood plan’</i></p>

<b>Section/ Objective/ Policy</b>	<b>Page No.</b>	<b>Comment</b>
<b>SASM H2 Housing Numbers</b>	19	<p>The Council recognises the constraints in the neighbourhood plan area and commends the extensive and evidenced site selection process.</p> <p>The housing strategy would benefit from a number of additions and changes in order to improve clarity of the proposed strategy to meeting the housing requirement and ensure the deliverability of the proposed strategy is fully demonstrated.</p> <p>Firstly, more clarity is needed about the deliverability of some the allocated sites and the housing numbers they can accommodate in light of the identified constraints. Specific comments are identified in relation to relevant site allocations below. The housing figures in this policy (and the site specific policies) should be expressed as '<i>at least xx homes</i>', rather than '<i>up to x homes</i>', to provide more certainty about housing delivery and conformity with the District Plan housing requirement for Stanstead Abbots and St Margarets.</p> <p>Secondly, criterion e) refers to 8 homes with planning permission in Policy SASM H8 (site 28). Policy SASM H8 refers to 6 homes with planning permission. Clarity is needed about the correct figure.</p> <p>Thirdly, criterion g) refers to 15 homes that have been completed since April 2017. It would be helpful to include details (perhaps in an appendix) of the relevant planning application references and dwelling numbers for each site to provide clarity on where the completions have occurred and contributed to the housing supply.</p>

Section/ Objective/ Policy	Page No.	Comment
<b>Site Allocations</b>		
<b>SASM H3 Land east of Netherfield Lane/south of Roydon Road</b>	19-22	<p>As outlined above, District Plan Policy VILL1 justifies the exceptional circumstances for amending the Green Belt boundary at Stanstead Abbots and St Margarets to accommodate the district’s housing strategy. It is clear from Appendix C that the Neighbourhood Plan Group has undertaken an extensive site selection process that demonstrates the housing requirement of a minimum of 94 dwellings cannot be accommodated within the existing settlement boundary.</p> <p>The policy provides a good framework for the development. The Council has a number of comments about the policy criteria:</p> <p>II. The policy encourages the provision of First Homes. The Council has recently approved a First Homes Policy Statement: <a href="#">Issue - items at meetings - First Homes – Adoption of a Technical Guidance Note - East Herts District Council</a>. Accordingly, the Housing Services team have advised that East Herts Council does not consider First Homes to be a suitable for affordable housing delivery in the district and will not seek the inclusion of First Homes in new developments. By supporting the delivery of First Homes, the Neighbourhood Plan conflicts with the Council’s approach to affordable housing.</p> <p>The First Homes Policy Statement sets the First Homes discount at 30% in circumstances where the developer proposes to deliver First Homes, (the council will accept First Homes where the developer wants to include them in the affordable housing contribution and is</p>

Section/ Objective/ Policy	Page No.	Comment
		<p>not open to the provision of shared ownership; the council will not proactively seek the inclusion of First Homes). First Homes discount, once set, applies uniformly across the whole District and to all property types and sizes.</p> <p><u>Paragraph 3.34</u> of the document states that a new build 2 bed homes require a discount of 37.5% to bring the price down to £250,00 which is the price cap for First Homes. Nevertheless, it is proposed in paragraph 3.36 that the minimum discount of 30% is applied as anything more may impact on viability. However, the developer will not achieve a sale price of more than £250,000 as this is the maximum price that can be charged for First Homes. Consequently, at a market value of £400,000 a 30% discount will have the same impact on viability as a 37.5% discount.</p> <p>Additionally, a discount that doesn't achieve a sale price of £250,000 or less can result in a significant cash benefit for the first buyer as the £250,000 price cap only applies to the first sale. For instance, a property with a market price of £400,000 with a discount of 30% applied, equals a sale price of £280,000. However, the price cap applies so it is sold for £250,000. When the property is sold the 30% discount will apply, but there will not be a price cap. If the market value of the property remains £400,000, the sale price will be £280,000 meaning the first buyer will achieve a profit of £30,000 without the value of the property increasing.</p>

Section/ Objective/ Policy	Page No.	Comment
		<p>To ensure the policy is deliverable it should reflect the Council’s approach to affordable housing delivery. Therefore, reference to First Homes should be deleted.</p> <p>III. This criteria could be more positively worded. The first sentence provides little value for the decision-maker and although clearly not the intention, the wording implies green space is an ‘add on’ after the housing and related infrastructure’ is delivered. It would also be helpful to refer specifically to the Green Belt boundary instead of the settlement boundary. It is suggested the wording is revised as below, or similar:</p> <p><del>There should be no greater land take of greenfield land than is necessary to deliver the development. Any part of the greenfield area of the site that is not required for housing or related infrastructure</del> <b>The development</b> should provide <b>high quality</b>, accessible green infrastructure including a permanent defensible landscaped boundary to <del>contain the settlement edge</del> <b>define the new Green Belt boundary.</b></p> <p>IV. Reference to the Masterplanning and Design Guidelines is welcomed. It provides useful context and design context to inform the site allocation. However it is unclear if the document is part of the evidence base that informs the policy or if it includes additional design guidelines that need to be considered. If the latter is the case, it is suggested for clarity that the criteria clearly states that the Masterplanning and Design Guidelines should be taken into account. Alternatively, the relevant site-specific criteria should refer to the Guidelines where necessary.</p>

Section/ Objective/ Policy	Page No.	Comment
		<p>IV:  (a) This criterion states, Housing mix should reflect local need, with predominantly 3/4-bed homes for open market sale and smaller 1, 2 and 3 bed affordable homes.  It appears that the policy seeks to deliver a housing mix specific to the needs of the village. The implication is that the affordable dwellings will be allocated to households with a connection to the village.</p> <p>The District Plan includes a policy (HOU4) that allows for the development of affordable housing outside the village boundary to exclusively meet an evidenced housing need of the village. Such a development will be subject to a local letting policy which gives preference to households with a local connection. However, it is not proposed that this development is justified in terms of being a rural exception site. The dwellings on this site are intended to meet the District Plan housing target for Stanstead Abbots and St Margarets which forms part of the overall housing target for the District and is not specific to the needs of the village. There is a need for a mix of property types as set out in Table 14.2 of the District Plan to meet district wide needs. The council will negotiate the housing mix on a site-by-site basis considering factors such as the location of the development and what has been or will be delivered on other sites. Given that the development is to meet district wide needs, households with a connection to the village will not be awarded preference over other households on the housing register with a greater housing need. Affordable dwellings for</p>

Section/ Objective/ Policy	Page No.	Comment
		<p>rent delivered on the site will be allocated according to the council’s Housing Register and Allocations Policy.</p> <p>b) This criteria states that ‘40% affordable housing will be required on land outside the site with permission (3/20/0502/OUT) plus land for a 6-unit housing scheme made available to the Baesh Trust’. It is understood from this statement that the community led housing scheme will not form part of the affordable housing contribution. However, the policy should not specifically require 40% affordable housing on land outside the site with permission. The site allocation refers to the whole site. Whilst the existing permission (3/20/0502/OUT) does not include affordable housing due to remediation costs, once this site has been allocated and removed from the Green Belt, the applicant could submit a new planning application for the whole site. The viability considerations of the whole site would be different to the permitted site, therefore the requirement for affordable homes could be different. This would be determined at planning application stage, but to ensure conformity with District Plan Policy HOU3 Affordable Housing, reference to 40% affordable housing on part of the site should be removed.</p> <p>f) Given the landscape and biodiversity benefits, the Council supports the retention of existing trees and hedgerows on the site. However, given the size of the wooded area on the site are the Parish Council confident that the capacity 60 dwellings is deliverable? It is noted that the Masterplanning and Design Guidelines (2021) indicate 89 homes can be accommodated and that the SEA states the capacity on the site has been reduced to</p>



Section/ Objective/ Policy	Page No.	Comment
		<p>mitigate the impact on heritage assets; presumably this also takes into account the retention of the wooded area? This evidence is positive but as the site is central to the NP housing strategy, it is important that the Parish Council can fully justify the estimated capacity.</p> <p>i) The Plan states '<i>Design concepts must be sympathetic to the setting of the grade I and II historic buildings close to the site and protected views through the sites.</i>' – this should be amended to say Grade II* and II listed buildings – or simply say "...sympathetic to the setting of Listed Buildings close to the site.</p> <p>It is noted the table on p22 details the current/previous use as B1 (a), B2, B8. For clarity, the use classes need updating to reflect the changes in 2020 and reference to the greenfield part of the site should also be included.</p>
<b>SASM H4 Land South of South Street</b>	23-24	<p>The policy does not prescribe the number of dwellings that should be provided on this site and give certainty of their delivery and contribution to the overall housing strategy. Recommend the addition of a criteria to address this.</p> <p>Given the constraints on SASM H4, the Council is concerned that 9 dwellings may not be deliverable. It is recognised that the capacity of 9 was identified in the Masterplanning and Design Guidelines (2021), but this was on a larger site of 0.89ha that included Green Belt land. The allocation SASM H4 is identified as 0.3 ha on p23 and is the northern, brownfield part of the site, within the village settlement boundary. Criterion II acknowledges</p>

Section/ Objective/ Policy	Page No.	Comment
		<p>‘constraints on the site may however limit the number of homes achievable’. It is suggested that this wording is deleted because it does not relate to the land use of the site, but suggests uncertainty about the deliverability of 9 homes. The Council suggests that the potential capacity of the site is clarified.</p> <p>Criterion j) identifies a need for a landscape buffer given the pylon to the west of the site. This is supported, but will clearly reduce the developable area. The other major constraint is flood risk, which is not referenced in the policy. The site is flood zone 2 and 3 (a), so a flood risk assessment will be required at the planning application stage.</p> <p>In relation to flood risk, paragraph 161 of the National Planning Policy Framework (NPPF) states that all plans should apply a sequential, risk-based approach to the location of development by applying the sequential test and then, if necessary the exception test. Further guidance is provided in the Planning Practice Guidance (PPG) Flood Risk and Coastal Change -<a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a> (particularly paragraphs 15, 16 and 17 in relation to neighbourhood planning). The site assessment process (explained in appendix c) and the Strategic Environmental Assessment demonstrates that the assessment of flood risk has informed the development strategy. However, as a number of the allocated sites within the settlement boundary fall within flood zone 2 and 3, it should be clearly demonstrated that the sequential test (and where relevant the exception test) has been applied to demonstrate that alternative sites with lower flood risk are not available. If the allocations pass the sequential and the exception test (if</p>

Section/ Objective/ Policy	Page No.	Comment
		<p>relevant) it is suggested that the Parish Council should consider the following issues to ensure the Neighbourhood Plan meets the basic conditions:</p> <ul style="list-style-type: none"> <li>• That the site capacity reflects the flooding constraint, for example reducing the developable area to avoid the area of worse flood risk.</li> <li>• That any flood mitigation will not compromise the deliverability of the site.</li> <li>• The policy could incorporate a policy criteria about reference to flood mitigation.</li> </ul>
<p><b>Policy SASM H5 Land West of Amwell Lane</b></p>	<p>25</p>	<p>This site is greenfield land within the settlement boundary identified for up to 8 dwellings. The number of dwellings this site can accommodate should be included as a policy criteria.</p> <p>Given that flooding is also a significant constraint on this site (flood zone 2 and 3, but with some flood defences) the flood risk comments raised above in response to Policy SASM H4 should be taken into account for this site too.</p> <p>It is also noted that the Masterplanning and Design Guidelines (2021) estimate the site is suitable for 6-8 dwellings. Given the need to ensure the housing strategy is achievable, would it be more realistic to state the site can accommodate ‘at least 6 dwellings’, instead of ‘up to 8’.</p> <p>Generally, the policy includes a good range of criteria to effectively inform the development of the site. Criterion g) relates to drainage solutions. To ensure clarity for decision-makers it is suggested the phrase ‘some form of’ is deleted as follows:</p>

Section/ Objective/ Policy	Page No.	Comment
		<p><i>'It is expected that <del>some form of</del> <b>additional</b> water management features will be required along with permeable paving'. In accordance with the Masterplanning and Design Guidelines it would be helpful to state this should be in the southern part of the site.</i></p>
<p><b>Policy H6 Chapelfields and Abbotts Way Garages</b></p>	<p>27- 28</p>	<p>The number of dwellings this site can accommodate should be included as a policy criteria.</p> <p>The Council commends the policy criteria, but criterion II could be amended. It identifies topography as a constraint. Instead of this statement, it would be more helpful to include a more positive policy criterion which aims to ensure that the design and layout responds effectively to the topography.</p>
<p><b>Policy H7 Land East of Amwell Lane.</b></p>	<p>26 and 27</p>	<p>The number of dwellings this site can accommodate should be included as a policy criteria.</p> <p>Given that flooding is also a significant constraint on this site (flood zone 2 and 3) the flood risk comments raised above in response to Policy SASM H4 should be taken into account for this site too.</p> <p>In addition to the flood risk, it is understood that the site contains high pressure sewers connecting to the pumping station, which could restrict development. Is the Parish Council sure redevelopment of the site can overcome these constraints?</p> <p>Criterion II notes that a wildlife site covers part of the site, this relates to a protected species. Before submission of the plan feedback from Herts and Middlesex Wildlife should be sought</p>

<b>Section/ Objective/ Policy</b>	<b>Page No.</b>	<b>Comment</b>
		<p>to clarify the impact of development on the protected species. If impact can be mitigated. measures should be identified in the policy.</p> <p>Criteria III c) and e) need additional clarification. What does ‘room for deliveries’ mean in practice and likewise it is unclear what ‘clearance for the operation of the pumping station’ means.</p>
<b>Policy SASM H8: Sites with Planning Permission</b>	31	<p>There is only one site with planning permission so Policy SASM H8 should relate to the site in question: Policy SASM H8 Hoddesdon Road.</p> <p>Given that construction of the 6 homes is already underway, it seems unlikely this will not be completed. However, if this is not the case when the submission version of the neighbourhood plan is drafted, the Council support the retention of this policy for Hoddesdon Road.</p>
<b>Policy SASM H11: First Homes</b>	32 and 33	<p>Bullet points I, II &amp; III – See comment above in response to SASM H3, the Council will not seek the inclusion of First Homes in new development.</p> <p>Bullet point V- The criterion seeks to impose local connection criteria to First Homes which give preference to households with a connection to the village. As stated in response to SASM H3, the housing target for Stanstead Abbots and St Margarets in the District Plan forms part of the overall housing target for the District and is not specific to the needs of the village. In effect the Neighbourhood Plan seeks to restrict the occupation of affordable</p>

<b>Section/ Objective/ Policy</b>	<b>Page No.</b>	<b>Comment</b>
		<p>housing that forms part of the overall housing target for the District. This undermines the Council's ability to deliver the overall affordable housing target.</p> <p>In these circumstances, the local connection criteria should be consistent with the criteria applied for other low-cost home ownership homes in East Hertfordshire, principally shared ownership as set out in the council's First Homes Policy Statement. To ensure consistency with the Council's approach it is recommended this policy is deleted.</p>
<b>Policy SASM D1 Design of Development</b>	37	The Council commends the design approach, signposting the Masterplanning and Design Framework (2021), to ensure local character and context is considered.
<b>Policy SASM HA1 Heritage Assets</b>	43	<p>The policy title 'Heritage Assets' should be renamed "SASM HA1: Designated Heritage Assets" as it only deals with those heritage assets that are designated.</p> <p>Criterion II should be reworded as follows: '<i>Development proposals which affect all any designated heritage assets above ground (Listed Buildings, Scheduled Monuments and Registered Historic Parks and Gardens), and, <u>or</u> below ground, should preserve and enhance the significance of the assets and their settings</i>'.</p>

<b>Section/ Objective/ Policy</b>	<b>Page No.</b>	<b>Comment</b>
<b>Policy SASM HA2 Non-designated Heritage Assets</b>	44	<p>NHA6 Drinking Fountain, at front of village hall, Roydon Road – should this refer to the Parish Hall rather than village hall?</p> <p>On Page 88, Figure 34, for consistency, reference to “water trough” should refer to Drinking Fountain as per policy SASM HA2.</p>
<b>Policy SASM HA4</b>	46	<p>The Council supports the protection of key views, but has some comments:</p> <ul style="list-style-type: none"> <li>• View 3- The title could be improved for clarity, for example ‘Looking north-west to Maltings along Roydon Road (north of junction with Abbots Rise)’. This would also need to be changed in Figure 34.</li> <li>• View 5- The title could be improved for clarity, for example ‘North-east and south-west along the Mill Stream from footbridge in Maltings Car Park’ It is noted that figure 36 only shows the north-east view, but the Conservation Area Appraisal identifies the south-west view, so it would be better if the NP captured both.</li> <li>• View 6- is of the Church of St Andrew along Cappell Lane. A further view is identified in the Conservation Area Appraisal of the immediate view of the church from Cappell Lane. Perhaps this should also be included?</li> </ul>

<b>Section/ Objective/ Policy</b>	<b>Page No.</b>	<b>Comment</b>
<b>Policy SASM NE1 Local Green Space</b>	49	<p>The Council supports the policy approach and the designation of local green spaces. For clarity, it is suggested Appendix G includes the size of each LGS (in hectares) as this has been requested by examiners in recent neighbourhood plan examinations.</p> <p>Criterion II- Reference to consistency with District Plan Policy CFLR2 should be deleted. The question of appropriate LGS policy is now subject to the guidance of the Court of Appeal in <u>R (Lochailort) v Mendip DC</u> (2020) EWCA Civ. 1259, to the effect that unless exceptional reasons are given, LGS policy should be consistent with NPPF policy.</p>
<b>Policy SASM CL2 Loss of Existing Facilities</b>	61	The loss of community facilities is addressed by District Plan Policy CFLR8 and this policy appears to duplicate the policy approach and add no locally specific value, so consider deleting.
<b>Policy SASM B1 Local Employment Areas</b>	65-66	Paragraph 9.15 states that the Council has an Article 4 Direction to restrict permitted development rights in the employment sites. However, this is not the case as the Article 4 was not confirmed. As such development within the employment areas that falls within the remit of permitted development (even if it is not 'business uses') cannot be restricted by the planning system. In any case, it is considered that criteria I and II of SASM B1 duplicates District Plan Policy ED1 Employment so consider deleting.



<b>Section/ Objective/ Policy</b>	<b>Page No.</b>	<b>Comment</b>



## Appendix 20



Stanstead Abbots and St Margarets Neighbourhood Plan

By email: [Sa.neighbourhoodplan@gmail.com](mailto:Sa.neighbourhoodplan@gmail.com)

Chris Colloff



Email: [chris.colloff@thameswater.co.uk](mailto:chris.colloff@thameswater.co.uk) Mobile: 07747 647021



Thames Water Ltd 1<sup>st</sup> Floor West Clearwater Court Vastern Road Reading  
RG1 8DB



[thameswater.co.uk](http://thameswater.co.uk)

Our Ref:

30 March 2023

## Stanstead Abbots and St Margarets Neighbourhood Plan Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water on the above Neighbourhood Plan. Thames Water are the statutory sewerage undertaker for the Neighbourhood Area and the statutory water undertaker for part of the Neighbourhood Area. Thames Water are also the owner of the New River which passes through the Neighbourhood Area.

### Site Specific Comments

A high level review of the potential impacts of the proposed site allocations has been undertaken and comments are appended to this letter. This review is based on the information currently available. The position can alter as changes arise elsewhere within the networks and details of the scale of development and points of connection are confirmed. We would encourage developers to engage with us ahead of the submission of any planning application to discuss infrastructure requirements for their developments.

#### Site H5 - Land West of Amwell Lane

This site is owned by Thames Water and the proposed allocation is supported. Due to the proximity to the New River the design of development will need to retain ability to access across a 5m strip from the base of the embankment of the New River to provide access for any maintenance works that may be necessary in the future. In addition, the construction methodology for any development would need to be agreed with Thames Water in order to protect the structure of the New River.

#### Site H7 - Land East of Amwell Lane

This site contains an operational sewage pumping station and as such any application for development will need to demonstrate that suitable operational access to the pumping station will be retained and that occupiers of the new development will not be adversely affected by odour or noise in order to ensure that development is acceptable. It should be noted that the Thames Water is a sewage pumping station and is not connected with the New River as mentioned in Section 3.3. Sewers cross the site and any development will need to ensure that the existing assets are protected. Developers are advised to engage with Thames Water at an early stage to discuss any proposals for the site.

Thames Water Utilities Limited, a company registered in England and Wales with company number 02366661.  
Registered office address: Clearwater Court, Vastern Road, Reading RG1 8DB. VAT registration number: GB 537-4569-15.

Stanstead Abbotts & St Margarets NP



I trust the above comments will be given due consideration. Should you have any queries regarding the comments please do not hesitate to contact me.

Kind regards,

Chris Colloff  
MRTPI Planner



## Appendix 21

### Response from Environment Agency

Cllr Julia Davies,  
Chairman, Stanstead Abbots and St Margarets  
Neighbourhood Plan Steering Group

**Date:** 26 June 2024

Dear Julia

#### **Stanstead Abbots Draft neighborhood plan**

Thank you for sending us a copy of your neighborhood plan and I apologise for the delay in responding. We are a statutory consultee in the neighbourhood planning process and aim to reduce flood risk and protect and enhance the water environment. Based on our review of the environmental constraints affecting the neighbourhood plan area and for which we are a statutory consultee, we have no concerns with your current plan, but I have included some advice which you might find helpful.

#### **Flood Risk**

The Neighbourhood Plan proposes various site allocations, the majority of which already have planning permission or have been built out, of the outstanding ones we are please to see that these are located outside of the flood plain. Built development should be steered away from flood zones, with the sequential approach being applied on site.

#### **Main Rivers**

As you have identified in section 1.14 there are 4 main rivers running through the plan area. We are please to see that Objective E encourages interaction with the water courses.

Policy **SASM R1 Riverside Development** should include a point about providing an undeveloped bufferzone adjacent to watercourses for biodiversity and flood risk benefits, I note it is mentioned in **SASM NE4 Environmental Impact of Flooding** but it would be good to have it reiterated here.

These watercourses are currently failing to reach good ecological status/potential under the Water Framework Directive (currently classified as having moderate/poor status). Developments within or adjacent to these watercourses should not cause further deterioration and should seek to improve the water quality based on the recommendations of the Thames River Basin Management Plan. We recommend including more specific reference to water quality and the Thames River Basin Management Plan within Policy SASM R1, in order to strengthen the policy wording.

#### **Source Protection Zones/Aquifers**

There are large areas of groundwater source protection zones under the plan area. Including source protection zone 1 (SPZ1) our most sensitive groundwater area. The inclusion of wording highlighting the presence of these zones (and the subsequent



End

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importance of protecting our controlled waters) should be considered within the plan. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance [here](#).

For your information, together with Natural England, English Heritage and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available [here](#).

Please let me know if you have any questions.

Yours sincerely

**Mr Kai Mitchell**  
**Sustainable Places Planning Specialist**

Direct dial 0203 0259074

Direct e-mail [HNL SustainablePlaces@environment-agency.gov.uk](mailto:HNL SustainablePlaces@environment-agency.gov.uk)

## Appendix 22

### SEA for the Stanstead Abbots Neighbourhood Plan June 2024

#### Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
EH Environmental Planner	CB Principal Environmental Planner	NCB Technical Director	NCB Technical Director
RC Senior Environmental Planner			

#### Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Name</u>	<u>Position</u>
V1	01 May 2024	Full draft for QB review	JD	SASMNP Steering Group
V2	24 June 2024	Final for submission	CB	Principal Environmental Planner

Prepared for:

Stanstead Abbots and St Margarets Neighbourhood Plan Steering Group

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# Non-Technical Summary (NTS)

## Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Stanstead Abbots and St Margarets Neighbourhood Plan (SASMNP). The SASMNP is being prepared under the Neighbourhood Planning Regulations 2012 and in the context of the adopted East Hertfordshire District Plan (2018). Once 'made' the SASMNP will have material weight when deciding on planning applications, as part of the East Hertfordshire local development framework.

SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects.<sup>1</sup>

This Non-Technical Summary (NTS) provides a summary for the full Environmental Report for the SASMNP. It is published alongside the 'submission' version of the Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).

## Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

- 1) What has plan-making / SEA involved **up to this point?**
  - including in relation to 'reasonable alternatives'.
- 2) What are the SEA findings **at this stage?**
  - i.e., in relation to the submission plan.
- 3) What happens **next?**

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'.

## What is the Plan seeking to achieve?

The following vision has been established in the development of the SASMNP:

*"Our vision is for Stanstead Abbots, St Margarets, and The Folly to thrive as a diverse and inclusive rural village that supports varied livelihoods and promotes community cohesion and wellbeing. We will promote locally accessible and sustainable development that provides affordable housing whilst protecting the heritage of our area and the individual character of each parish. Our vision includes the enhancing of our green spaces for wildlife and community use, the*

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<sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process. Whilst no initial screening was undertaken, the Parish and District agreed a high likely requirement for SEA and the initial steps of the SEA process involved obtaining views from consultees on both the need for SEA alongside the suggested scope of the SEA.

*development and improvement of natural flood defences, and further establishing our place in the wider Lea Valley corridor.”*

The SASMNP is working within the strategic context provided by the East Hertfordshire District Plan (EHDP), adopted 2018. The EHDP recognises Stanstead Abbots & St Margarets as a village inset from the Green Belt and Policy GBR1 states that *“the villages of Hertford Heath, Stanstead Abbots & St Margarets, and Watton-at-Stone will be encouraged to consider whether it is appropriate through the formulation of a Neighbourhood Plan to accommodate additional development”*. A provision for 94 homes in Stanstead Abbots and St Margarets in the period up to 2033 is expected by the EHDP.

## What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented below.

SEA theme	SEA objective
Biodiversity	Protect, maintain, and enhance the extent and quality of biodiversity and geodiversity sites and networks within and surrounding the Plan area.
Climate change (including flood risk)	Reduce the contribution to climate change made by activities in the Plan area.
	Support the resilience of the Plan area to the potential effects of climate change, including flooding.
Health and wellbeing	Improve the health and wellbeing of residents within the SASMNP area.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the SASMNP area.
Land, soil, and water resources	Ensure the efficient and effective use of land.
	Protect and enhance water quality and use and manage water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including the river corridor and strategic green infrastructure links.
Population and communities	Ensure growth in the Plan area is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

## Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a ‘reasonable’ range of alternative approaches for the SASMNP.

Specifically, Part 1 of the report –

1. Explains the process of establishing the reasonable alternatives.
2. Presents the outcomes of assessing the reasonable alternatives; and
3. Explains reasons for developing a preferred option, considering the assessment.

## Establishing the alternatives

Part 1 of the Environmental Report explores both the strategic parameters provided by the EHDP and the available site options to establish alternatives to the preferred approach for housing development.

From the choices available to the group, 4 options are derived, see the table below.

Housing supply source	Option 1	Option 2	Option 3	Option 4
<b>Permitted/ completed sites to be allocated</b> (Sites 16, 28, 29, 30a, 30b, 36, 37, and 38)	24	24	24	24
<b>Brownfield sites within the settlement boundary</b> (Sites 5, 6, 32, and 33)	15	15	15	15
<b>Greenfield sites within the settlement boundary</b>				
Amwell Lane (Site 35)	8	-	-	-
<b>Settlement expansion options:</b>				
Netherfield Lane (Sites K (brownfield) and L)	20*	60	-	-
Marsh Lane (Site C1)	18	-	-	-
Land south of Station Road (Site C2)	-	-	100	-
Roydon Road/ Hunsdon Road (Site C3)	-	-	-	114
East of Cappell Lane (Site NEW2)	15	-	-	-
<b>Total housing supply</b>	<b>92</b>	<b>99</b>	<b>139</b>	<b>153</b>

\*Outline planning permission at Site K included

Option 1 presents a strategy based on progression of small sites. However, it is recognised that allocating Site K in isolation from Site L may be problematic and the option still falls slightly short of the identified need for 94 homes. Options 2-4 present alternative options for greenfield development at a single larger site.

Notably, both Option 3 and 4 would likely require bringing additional land within the inset settlement boundary to accommodate a logical extension to the settlement.

Whilst indicative figures have been identified in terms of housing numbers under Options 3 and 4, it is recognised that further negotiations with landowners may be able to secure a reduced scale development scheme at the larger sites, which aligns more closely with the identified need and community preference (i.e., a preference not to significantly exceed the identified target housing needs figure).

Furthermore, it is also recognised that a hybrid option or multiple combinations of further options could be formed but this would be disproportionate for the purposes of strategic assessment at this stage and would hinder clarity when informing subsequent plan-making decisions.

## Assessing the alternatives

The full assessment of the options for housing are presented in Part 1 of the Environmental Report. The summary findings are presented below.

### Summary findings

		Option 1	Option 2	Option 3	Option 4
<b>Biodiversity</b>	<b>Significant effect?</b>	No	No	No	No
	<b>Rank</b>	2	1	1	1
<b>Climate change</b>	<b>Significant effect?</b>	Yes - negative	No	No	No
	<b>Rank</b>	2	1	1	1
<b>Health and wellbeing</b>	<b>Significant effect?</b>	Yes - negative	No	No	No
	<b>Rank</b>	3	2	1	2
<b>Historic environment</b>	<b>Significant effect?</b>	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	<b>Rank</b>	2	2	1	2
<b>Land, soil and water resources</b>	<b>Significant effect?</b>	No	No	No	No
	<b>Rank</b>	2	1	2	2
<b>Landscape</b>	<b>Significant effect?</b>	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	<b>Rank</b>	1	1	3	2
<b>Population and communities</b>	<b>Significant effect?</b>	Yes - positive	Yes - positive	Yes - positive	Yes - positive
	<b>Rank</b>	2	1	1	1
<b>Transportation and movement</b>	<b>Significant effect?</b>	No	No	No	No
	<b>Rank</b>	2	1	1	1

Overall Option 1 is notably more constrained than the other options and this relates to development within an area of medium to high fluvial flood risk as well as the potential loss of an area of open space.

All options have landscape and historic environment sensitivities which will require mitigation to reduce the significance of effects. Such mitigation is considered likely to be more effective in relation to landscape under Options 1 and 2.

All options are likely to lead to significant positive effects in relation to the population and communities theme, by allocating land to meet the forecasted housing needs over the Plan period. However, it is recognised that Option 1 is formed of smaller sites which are less likely to deliver a range of housing types and tenures, with implications for the delivery of affordable housing.

## Developing the preferred approach

The SASMNP Steering Group's reasons for developing the preferred approach considering the assessment are identified below:

*“The alternative options assessment demonstrates the issues with Option 1 by identifying likely significant negative effects in four categories, whilst the other options only show this to be the case for the Historic Environment and Landscape. This supports the Steering Groups conclusion not to base the SASM Neighbourhood Plan site allocations on just the brownfield portion of the Netherfield Lane site and including Marsh Lane and Cappell Lane as options in addition to Amwell Lane. In addition, the site in Marsh Lane has considerable constraints and the site in Cappell Lane was not put forward by the landowner at any point during the preparation of the Plan.*

*In terms of the relative merits of the remaining three Options 2, 3 and 4, the overall rankings of the sites show Option 2 to be ranked more slightly higher with a score of 10 as against Option 3 with a score of 11 and Option 4 as a score of 12.*

*From the point of view of the SASM Steering Group, there are issues for the settlement boundary in the case of Options 3 and 4. Site C2 would involve the significant extension of the settlement boundary to include St Margaretsbury and in the case of Site C3, it would encompass Kitten Lane and an important piece of common land, plus an extension of the settlement northwards on Hunsdon Road.*

*Considering the above, the preferred option is to allocate the larger Netherfield Lane site (Option 2) supported by smaller sites within the settlement boundary which have already or are likely to be developed over the plan period.”*

## Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the SASMNP as a whole. Assessment findings are presented as a series of narratives under the 'SEA framework' theme headings. The following overall conclusions are reached:

Overall, the SASMNP is not judged likely to lead to any significant negative effects in relation to any of the SEA themes. Significant positive effects are considered likely through the proposed spatial strategy which meets the forecasted housing needs over the plan period. Notably the settlement area is well-connected in terms of its sustainable transport offer as well as its proximity to higher-tier settlements. In this respect future residents will be supported by local services and facilities, bus connections to nearby settlements, and rail connections to significant employment bases.

Minor negative effects are considered likely due to localised impacts in relation to landscape, and soil resources. This is largely due to an element of greenfield development which is inevitable in any spatial strategy for the plan.

Notably, impacts in relation to the historic environment at the Netherfield Lane site (Policy H3) are uncertain at this stage. However, there is notable potential for significant negative effects to be avoided through good design, supported by the policy requirements for significant green infrastructure enhancement at the site and design concepts which are sympathetic to heritage settings. A good way to ensure

significant negative impacts are avoided in this respect is to develop the proposed masterplan for the site in consultation with Historic England.

With regards to biodiversity, it is considered that the updated policy mitigation provided through the NP and responding to NE's concerns are sufficient to avoid significant effects arising. Alongside the wider policy measures to enhance biodiversity in the neighbourhood area, broadly neutral to minor positive effects are considered most likely.

## Next steps

This SEA Environmental Report will accompany the SASMNP for submission to the Local Planning Authority, East Herefordshire District Council, who will arrange further consultation (Regulation 16) and then Independent Examination.

At Independent Examination, the SASMNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the SASMNP will be subject to a referendum, organised by East Herefordshire District Council. If more than 50% of those who vote agree with the SASMNP, then it will be 'made'. Once made, the SASMNP will become part of the Development Plan for the area.

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of SASMNP to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the SASMNP will be undertaken by East Herefordshire District Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the SASMNP that would warrant more stringent monitoring over and above that already undertaken by East Herefordshire District Council.

# 1. Introduction

## Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Stanstead Abbots and St Margarets Neighbourhood Plan (SASMNP). The SASMNP is being prepared under the Neighbourhood Planning Regulations 2012 and in the context of the adopted East Hertfordshire District Plan (2018). Once 'made' the SASMNP will have material weight when deciding on planning applications, as part of the East Hertfordshire local development framework.
- 1.2 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects.<sup>2</sup>

## SEA explained

- 1.3 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.4 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".<sup>3</sup> The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.5 More specifically, the report must answer the following three questions:
  4. What has plan-making/ SEA involved up to this point?  
- including in relation to 'reasonable alternatives'.
  5. What are the SEA findings at this stage?  
- i.e., in relation to the submission plan.
  6. What happens next?

## This Environmental Report

- 1.6 This report is the Environmental Report for the SASMNP. It is published alongside the 'submission' version of the Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended). An earlier version of this SEA Environmental Report was prepared in April 2022, which accompanied the draft SASMNP at Regulation 14 consultation.
- 1.7 This report answers questions 1, 2 and 3 in turn, to provide the required information.<sup>4</sup> Each question is answered within a discrete 'part' of the report.

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<sup>2</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process. Whilst no initial screening was undertaken, the Parish and District agreed a high likely requirement for SEA and the initial steps of the SEA process involved obtaining views from consultees on both the need for SEA alongside the suggested scope of the SEA.

<sup>3</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>4</sup> See **Appendix A** for further explanation of the report structure including its regulatory basis.

1.8 However, before answering Q1, two further introductory sections are presented to further set the scene.

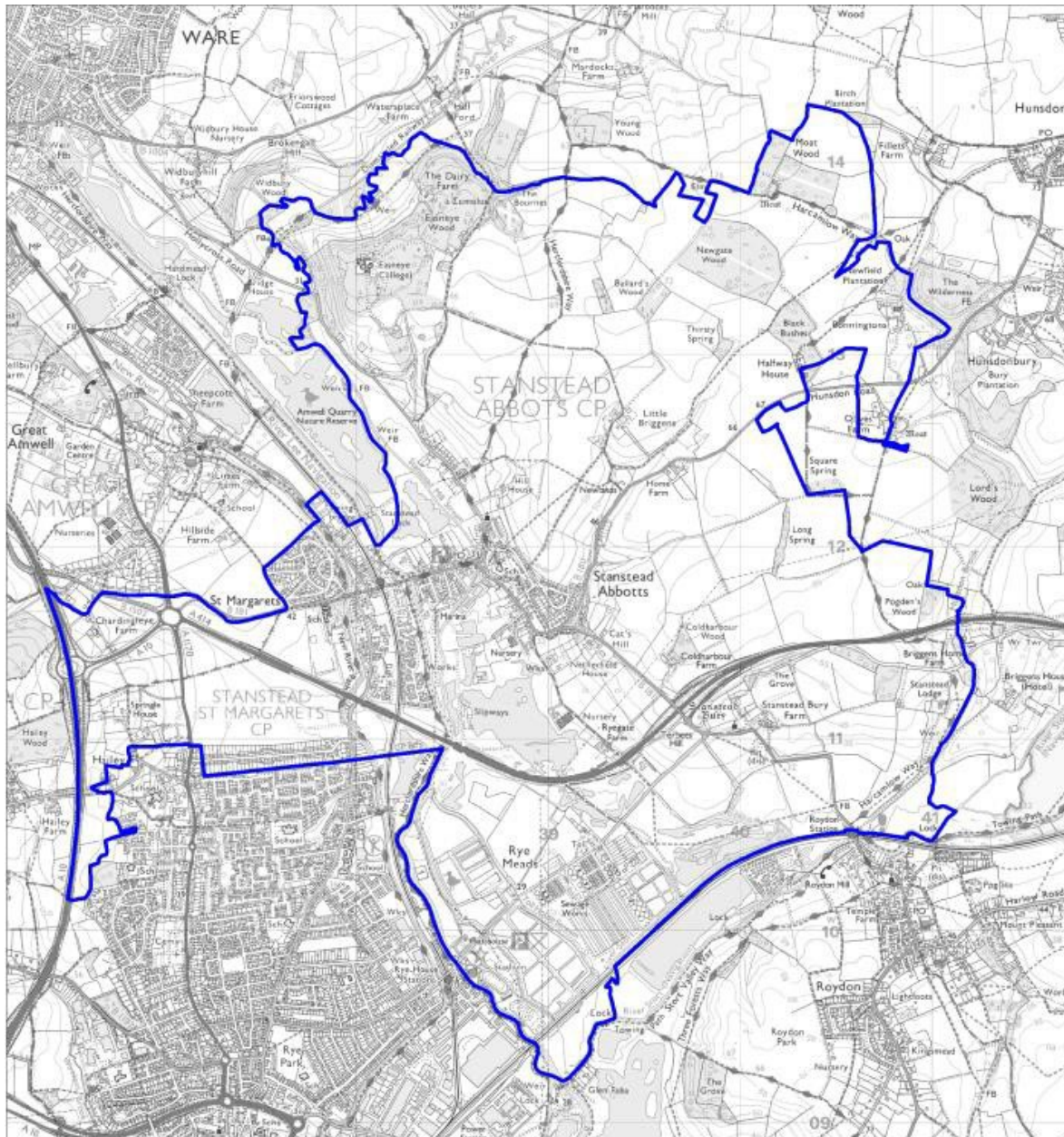


## 2. What is the SASMNP seeking to achieve?

### Introduction

2.1 This section considers the context provided by the East Hertfordshire District Plan (2018) before setting out the established Neighbourhood Plan vision and objectives. **Figure 2.1** presents the Plan area.

**Figure 2.1: SASMNP area, designated 2018**



## Strategic planning policy context

- 2.2 The Plan area falls within the boundary of East Hertfordshire district. The SASMNP must have regard for the strategic policies of the East Hertfordshire District Plan (EHDP), adopted 2018, in line with footnote 18 of the National Planning Policy Framework (NPPF).<sup>5</sup>
- 2.3 The EHDP recognises Stanstead Abbots & St Margarets as a village inset from the Green Belt and Policy GBR1 states that “*the villages of Hertford Heath, Stanstead Abbots & St Margarets, and Watton-at-Stone will be encouraged to consider whether it is appropriate through the formulation of a Neighbourhood Plan to accommodate additional development*”. Policy GBR1 (Green Belt) identifies that where proposals would involve changes to Green Belt boundaries, the District Council will consider making these amendments. The more recent update to the NPPF also now allows Neighbourhood Plans to change Green Belt boundaries if supported by strategic policies e.g., in this case the EHDP.
- 2.4 Policy VILL1 identifies Stanstead Abbots & St Margarets as a ‘Group 1 village’ and sets a range of parameters for growth in these areas, including: an appropriate scale, development that is in keeping with the character of the village, avoiding the loss of significant open space or important gaps, avoiding an extension of ribbon development, and protecting important views. Furthermore, Policy VILL4 protects three Employment Areas within the Plan area, at Leaside Works, Riverside Works (Amwell End) and The Maltings.

## SASMNP vision and objectives

- 2.5 The following vision has been established in the development of the SASMNP:
- “Our vision is for Stanstead Abbots, St Margarets, and The Folly to thrive as a diverse and inclusive rural village that supports varied livelihoods and promotes community cohesion and wellbeing. We will promote locally accessible and sustainable development that provides affordable housing whilst protecting the heritage of our area and the individual character of each parish. Our vision includes the enhancing of our green spaces for wildlife and community use, the development and improvement of natural flood defences, and further establishing our place in the wider Lea Valley corridor.”*
- 2.6 To support this vision, the SASMNP Steering Group have developed 18 objectives under the themes of housing and design, the riverside, heritage, natural environment, leisure and community facilities, business and employment, and transport.

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<sup>5</sup> MHCLG (2021) [National Planning Policy Framework](#)

## 3. What is the scope of the SEA?

### Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability themes and objectives that should be a focus of the assessment of the Plan and reasonable alternatives.
- 3.2 The SEA Scoping Report (December 2021) set out the policy context and baseline information that has informed the development of key issues and the sustainability objectives.

### Consultation

- 3.3 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.<sup>6</sup> As such these authorities were consulted over the period Tuesday 21<sup>st</sup> December 2021 to Wednesday 2<sup>nd</sup> February 2022. All consultees responded and agreed with the scope of the SEA providing general advice, and Natural England suggested a minor amendment to the proposed objective for biodiversity which has since been incorporated into the SEA. Scoping consultation responses are available via the SASMNP website.<sup>7</sup>

### The SEA framework

- 3.4 The SEA framework presents a list of themes, objectives, and assessment questions that together comprise a framework to guide the assessment. A summary framework of the themes and objectives is provided in **Table 3.1**, with the full SEA framework presented in the SEA Scoping Report, available via the SASMNP website.

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<sup>6</sup> These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

<sup>7</sup> <https://www.stansteadabbotsneighbourhoodplan.uk/>

**Table 3.1: The SEA framework**

<b>SEA theme</b>	<b>SEA objective</b>
Biodiversity	Protect, maintain, and enhance the extent and quality of biodiversity and geodiversity sites and networks within and surrounding the Plan area.
Climate change (including flood risk)	Reduce the contribution to climate change made by activities in the Plan area.
	Support the resilience of the Plan area to the potential effects of climate change, including flooding.
Health and wellbeing	Improve the health and wellbeing of residents within the SASMNP area.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the SASMNP area.
Land, soil, and water resources	Ensure the efficient and effective use of land.
	Protect and enhance water quality and use and manage water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including the river corridor and strategic green infrastructure links.
Population and communities	Ensure growth in the Plan area is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

# **Part 1: What has plan-making/ SEA involved to this point?**

## 4. Introduction (to Part 1)

### Overview

- 4.1 Whilst work on the SASMNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the Plan, namely the allocation of land for housing, or alternative sites. Available development sites are being explored for their potential to contribute additional homes and community benefits.

### Why focus on sites?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:
  - The core plan objective to understand housing needs and allocate sites for development.
  - Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
  - The delivery of new homes is most likely to have a significant effect compared to other proposals within the Plan. National Planning Practice is clear that SEA should focus on matters likely to give rise to significant effects.

### Structure of this part of the report

- 4.4 Part 1 of the report is structured as follows:
  - Chapter 5 explains the process of establishing reasonable alternatives.
  - Chapter 6 presents the outcomes of appraising reasonable alternatives; and
  - Chapter 7 explains the Steering Group's reasons for selecting the preferred option considering the alternatives.



## 5. Establishing alternatives

### Introduction

- 5.1 The aim of this chapter is to explain the process that led to the establishment of alternative sites and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.<sup>8</sup>
- 5.2 Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the SASMNP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

### How much growth?

- 5.3 As noted previously, the EHDP recognises Stanstead Abbots & St Margarets as a village inset from the Green Belt and Policy GBR1 states that “*the villages of Hertford Heath, Stanstead Abbots & St Margarets, and Watton-at-Stone will be encouraged to consider whether it is appropriate through the formulation of a Neighbourhood Plan to accommodate additional development*”. Furthermore, Policy VILL1 identifies Stanstead Abbots & St Margarets as a ‘Group 1 Village’. Chapter 10 of the EHDP identifies that Group 1 Villages will need to accommodate at least a 10% increase in housing stock over the 16-year period between 1<sup>st</sup> April 2017 and 31<sup>st</sup> March 2033. EHDP Table 10.1 identifies that this equates to 94 homes in Stanstead Abbots and St Margarets over this period.
- 5.4 Whilst small sites have gained planning permission since April 2017, East Hertfordshire District Council have advised that these sites will need to be allocated in the SASMNP to count towards the identified need for 94 homes. This is to ensure that no figures are double counted when capturing development that would contribute towards windfall housing supply over the Plan period, which East Hertfordshire District Council have calculated separately.

### Where could growth be located?

- 5.5 The Stanstead Abbots and St Margarets Steering Group have identified a total of 64 sites from a range of sources. A local call for sites was undertaken in 2019 in which six sites were submitted for consideration. The group then undertook a ‘walkabout’ of the Plan area to identify potential land to be considered. Further sites also emerged through consultation to date, and four sites were identified through the East Hertfordshire Strategic Housing Land Availability Assessment (SHLAA).
- 5.6 The Steering Group have undertaken an assessment of the available sites through three key stages. The first stage sought to knock out sites by critical criteria, such as location within Flood Zone 2 or 3, relationship to the existing settlement area, any potential loss of identified employment space, or because

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<sup>8</sup> Schedule 2(8) of the SEA Regulations.

the site is not available for development over the Plan period. Sites taken through to Stage 2 were then assessed in greater detail against a range of criteria underpinning an assessment of the site's suitability, availability, and deliverability. Each site was scored in relation to each criteria, and the outcome of the Stage 2 assessment was a ranked list of sites, depicting those sites judged to be 'top-performing'. The third stage of assessment undertook site selection from the ranked sites.

5.7 **Table 5.1** identifies the 64 sites, and their source and **Figure 5.1** displays the sites.

**Table 5.1: SASMNP site options**

Site reference	Site name	Source
C1	Marsh Lane	Call for sites
C2	Land south of Station Road	
C3	Roydon Road/ Hunsdon Road	
C4	St Margaretsbury Recreation	
C5	Roydon Road	
C6	Nursery Netherfield Lane	
1	North of High Street	Identified by Steering Group
2	Village Club car park	
3	South of High St/ west of car park	
4	North of High St	
5	Millers Lane	
6	South Street	
7	North of High Street	
8	Lawrence Avenue – east	
9	Lawrence Avenue – east/ High St	
10	Lawrence Avenue – west/ railway	
11	North Station Road	
12	Signal box	
13	North Station Road	
14	Folly View	
15	Folly View	
16	French Close – garages	
17	Scott Ave/ Gilpins Gallop	
18	Hillside Lane	



Site reference	Site name	Source
19	Hillside Lane/ entrance	
20	Hillside Lane/ Fieldway	
21	Fieldway/ New River Avenue	
22a	New River Avenue – garages	
22b	New River Avenue – garages	
23	Amwell Lane – garages	
24	Amwell Lane – industrial	
25	Sanville Gardens – green space	
26	The Granary – green space	
27	The Granary – green/ railway	
28	North of Hoddesdon Road	
29	East of Hoddesdon Road	
30a	West of Hoddesdon Road	
30b	West of Hoddesdon Road	
31	Chapelfields/ Woodcroft	
32	Chapelfields – garages	
33	Chapelfields – garages	
34	Chapelfields/ Woodcroft	
35	Amwell Lane	
36	Hillside Crescent	
37	French's Close	
38	French's Close	
A	Folly View	Identified at consultation
C	Recreation Ground	
D	Amwell View School	
E	Land south of Maltings	
F	Malting car park/ green space	
G	Maltings	
H	South of Maltings	
J	South of Marsh Lane	
K	Netherfield Lane	
L	Netherfield Lane	

<b>Site reference</b>	<b>Site name</b>	<b>Source</b>
M	Netherfield Lane – adj. Nursery	
P	School Recreation Ground	
Q	Cappell Lane	
S	South of Marsh Lane	
NEW2	East of Cappell Lane	East Herfordshire SHLAA
NEW3	Rear of St Andrew’s Church	
NEW10	West of Ware Road	
NEW11	West of Ware Road	

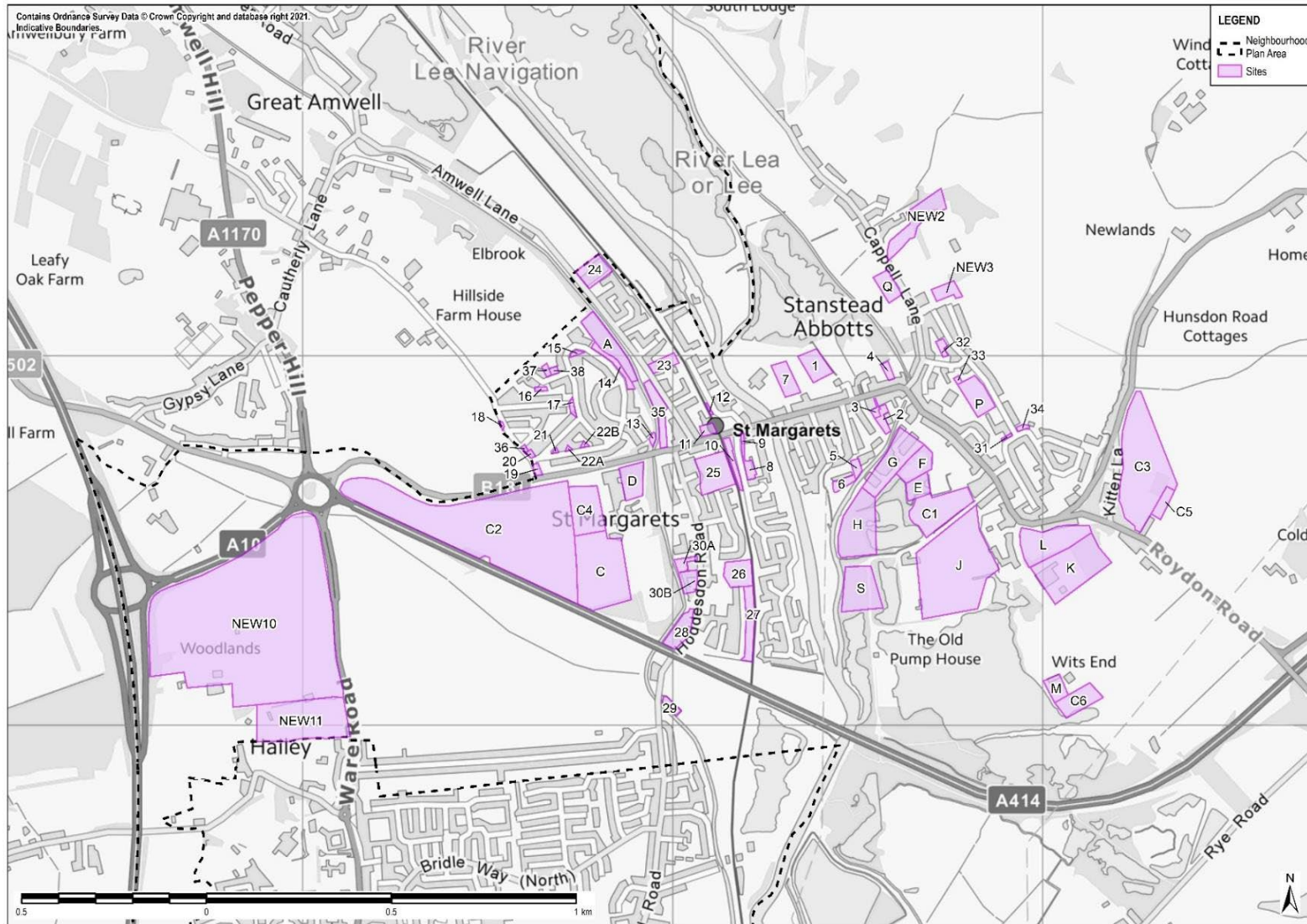


Figure 5.1: Sites identified in the development of the SASMNP

## Regulation 14 consultation feedback

- 5.8 Feedback through consultation has not identified any new sites for consideration or any need to revise housing targets for the NP. Of note, Natural England highlight that sites Land to the east of Netherfield Lane, South Street, and Amwell Lane fall within the Impact Risk Zones for Rye Meads SSSI, Amwell Quarry SSSI, Hunsdon meads SSSI, and Wormley-Hoddesdon Park SSSI. Therefore if such sites were to be allocated it would require further consultation with Natural England to assess the likely impacts and the provision of mitigation measures if required.
- 5.9 Natural England also highlight the flooding issues at Amwell Lane, recommending consideration be given to the Environment Agency's flood defence guidance. Natural England welcome further details on proposed solutions once these have been investigated.

## Establishing alternatives

- 5.10 In terms of the progression of sites through the SEA, an initial step has looked at key exclusionary criteria (like Stage 1 of the sites options assessment) and sought to sift the long list of sites where evidence indicates significant constraints to progression. These constraints are considered in turn below.

## Flood risk

- 5.11 The following sites are not considered any further due to their location within an area of high flood risk affecting most of the site/ developable area:
- Site 1: North of High Street
  - Site 4: North of High Street
  - Site 7: North of High Street
  - Site E: Land south of Maltings
  - Site H: South of Maltings
  - Site J: South of Marsh Lane
  - Site Q: Cappell Lane
  - Site S: South of Marsh Lane

## Unavailable sites

- 5.12 The following sites have since been identified by the Steering Group as unavailable for development over the Plan period, and are therefore not considered any further through the SEA:
- Site 2: Village Club car park
  - Site 11: North Station Road
  - Site 25: Sanville Gardens green space
  - Site 26: The Granary – green space
  - Site C: Recreation Ground

- Site D: Amwell View School
- Site F: Malting Car Park and green space
- Site P: School Recreation Ground
- Site NEW3: Rear of St Andrew's Church

## Employment areas

5.13 The following sites are located within an identified employment area. In line with SASMNP objectives, these areas will be retained to support economic vitality and provide local businesses with space to expand. As a result, these sites are not considered further through the SEA:

- Site 8: Lawrence Avenue East
- Site 24: Amwell Lane industrial
- Site G: Maltings (also identified as partially within an area of high flood risk)

## Very small sites

5.14 Many of the sites identified by the Steering Group on their 'walkabout' are very small sites, capable of delivering one, maybe two dwellings. Some of these sites are brownfield and all are located within the settlement boundary.

5.15 These sites are not taken forward as options for the spatial strategy but are rather recognised as a potential small-scale supply and a 'constant' (or given) for any growth scenario (i.e., very small sites will form part of any development plan over the plan period). The contribution that development could make at these sites will either be counted as part of windfall development (calculated separately by East Hertfordshire) or (where planning permissions are granted) the sites may be allocated within the SASMNP to contribute to the identified housing needs figure of 94 homes.

5.16 On this basis, the following very small sites are not progressed for further assessment as part of the alternatives (for the purposes of SEA) as they do not provide realistic spatial strategy options:

- Site 3: South of High Street/ west of car park
- Site 9: Lawrence Avenue – east/ High St
- Site 12: Signal box
- Site 13: North Station Road
- Site 15: Folly View
- Site 17: Scott Ave/ Gilpins Gallop
- Site 18: Hillside Lane
- Site 19: Hillside Lane/ entrance
- Site 20: Hillside Lane/ Fieldway
- Site 21: Fieldway/ New River Avenue
- Site 22a: New River Avenue – garages

- Site 22b: New River Avenue – garages
- Site 31: Chapelfields/ Woodcroft
- Site 34: Chapelfields/ Woodcroft

## Permitted/ built out sites

5.17 In addition to the above, some sites have gained planning permission since 2017. These sites (as advised by East Hertfordshire District Council) will need to be allocated within the SASMNP to count towards the identified housing needs figure of 94 homes.

- Site 16: French Close – garages (1 dwelling)
- Site 28: North of Hoddesdon Road (8 homes).
- Site 29: East of Hoddesdon Road (4 dwellings)
- Site 30a: West of Hoddesdon Road (6 dwellings)
- Site 30b: West of Hoddesdon Road (2 dwellings)
- Site 36: Hillside Crescent (1 dwelling)
- Site 37: French's Close (1 dwelling)
- Site 38: French's Close (1 dwelling)

## Open space

5.18 The following sites are further identified wholly as Open Space either allocated within the District Plan, or as a new Local Green Space being allocated through the SASMNP. In line with SASMNP objectives which seek to support the growing population with access to existing and new open spaces, these sites are not considered further for housing development within the SASMNP:

- Site 14: Folly View
- Site 27: The Granary
- Site A: Folly View – woodland
- Site C4: St Margaretsbury Recreation

## Short-listed sites

5.19 The above constraints reduce the long list of 64 sites to a short-list of **18 sites**.

5.20 The short-listed sites are considered in turn as each have merits and constraints to be considered in their progression as a potential allocation with the SASMNP. As a first port of call, seven of the 18 sites are located within the settlement boundary:

- **Site 10: Lawrence Avenue – west/ railway.** This site is a small strip of land adjacent to the railway and opposite an employment area. As a thin strip of land there is little potential to mitigate the impacts of the adjacent railway line in housing development, and the site is largely incompatible with surrounding land uses. With an employment area opposite, the site is judged to be more suitable for employment expansion than housing

development and is not progressed as a suitable housing option or alternative for the purposes of SEA.

- **Site 5: Millers Lane and Site 6: South Street.** These are smaller brownfield sites located adjacent to each other and within the settlement area. However, both sites are traversed by pylons creating an obstacle to development with an identified need for mitigation. To increase the viability of development at the sites, the sites are combined to create one larger development site with a greater potential to address the identified issues on site. Together the sites could deliver around 9 homes.

- **Site 23: Amwell Lane – garages.** This site partially forms part of a Local Wildlife Site and contains a pumping station. A reduced development area which avoids loss of habitats at the locally designated biodiversity site could be considered, however, this would significantly reduce the scale of development to 1-2 dwellings. The site is thus categorised like a very small site to be potentially captured through windfall development/ allocations in the SASMNP (see para 5.13).
- **Sites 32 and 33: Chapelfields – garages.** Both sites are brownfield land within the settlement boundary and both sites are relatively free from significant constraints. Site 32 has an identified capacity for 4 homes and Site 33 has an identified capacity for 2 homes.
- **Site 35: Amwell Lane.** The site is a stretch of greenfield land between Amwell Lane and the new river path with an identified capacity for 8 homes. The site is located within the settlement boundary and close to the train station.

5.21 This identifies that of the seven sites within the inset settlement boundary, five are potentially suitable for allocation within the SASMNP and progression through the SEA as a potential alternative. Two of these sites are combined to create one slightly larger site south of Millers Lane and South Street, thus four sites are progressed.

5.22 A further eleven sites are identified outside of the inset settlement boundary. At this stage, the constraints of the Green Belt, including the potential for Green Belt boundary amendments come into play for the Steering Group. It is noted that an extension to the settlement area ideally needs to be adjacent to the inset settlement boundary to facilitate Green Belt amendments through the Neighbourhood Plan and Local Plan joint working process. Further removed sites would likely require additional land outside the settlement boundary to fully connect development with the settlement and establish a coherent and cohesive settlement pattern/ boundary. Such an extension is in many cases beyond the aims of the SASMNP and likely to meet with local objection. Significantly removed sites are considered to a large extent, a strategic planning matter for the Local Plan. Each of the eleven sites are explored in turn below:

- **Sites K and L at Netherfield Lane.** Site K has received outline planning permission for a mixed-use development of 20 homes and supporting B1 business use land. The site is part brownfield but removed from the settlement edge. Site L brings the land between the settlement edge and Site K into consideration as a more logical extension to the settlement boundary. A masterplan for the larger site (Sites K and L combined) has



been submitted by developers demonstrating a mixed-use 60-home scheme (including a proportion of affordable housing) alongside B1 business use land.

- **Site C1: Marsh Lane.** The site is adjacent to the settlement boundary but is located partially within an area of high flood risk and contains Open Space as designated through the Local Plan. The Steering Group have investigated a reduced developable area that avoids high flood risk areas and retains designated Open Space, which could deliver around 18 homes.
- **Site C2: Land south of Station Road.** This is a large site within the Green Belt largely removed from the settlement boundary but connected by the north-eastern corner of the site at High Street. The site has the capacity for around 300 homes but a smaller scheme to meet local needs (at around 100 homes) could be considered. To create a more logical extension to the settlement area it may also be beneficial to include Amwell View Sports School and the open space at Site C4 (St Margaretsbury Recreation). A capped scheme at around 100 homes could also avoid development in the west of the site and reduce potential contributions to coalescence with Great Amwell.
- **Site C3: Roydon Road/ Hunsdon Road.** The site is another large site with a capacity for around 114 homes. To adjoin the existing inset settlement area additional land between the B180 and Kitten Lane would need to be brought within the inset settlement boundary.
- **Site C5: Roydon Road.** This is a small parcel of land to the south east of Site C3 with an identified capacity for 9 homes. Given the location of the site, it could only be reasonably considered as an extension to Site C3, constituting an even higher level of growth and boundary adjustments. Given the capacity of Site C3 to meet locally identified needs in full, it is unlikely that Site C5 would be progressed within this plan period. The site is thus not progressed as a reasonable alternative at this stage.
- **Site C6: Nursery Netherfield Lane.** This site is brownfield land but situated even further removed from the settlement edge than the sites discussed above. It is considered highly unlikely that the Steering Group would be able to develop a Green Belt adjustment that would be acceptable to the local community and East Hertfordshire District Council, and the site is not progressed as a reasonable alternative.
- **Site M: Netherfield Lane (adjacent to Nursery).** This part-brownfield site lies adjacent to Site C6 and like the findings for Site C6 it is significantly removed from the settlement boundary further north along Netherfield Lane. The site is not progressed as a reasonable alternative.
- **Site NEW2: East of Cappell Lane.** The site is greenfield land at Cappell Lane with an estimated capacity for between 10 and 20 homes. Open greenfield land containing numerous trees are situated between the site and the settlement edge and this adjoining land has not been identified as available.
- **Site NEW10 and Site NEW11: West of Ware Road.** Both sites are situated around Amwell Roundabout distinctly removed from the inset settlement area of Stanstead Abbots and St Margarets. Development in



this location would form more of an extension to/ better relate to the existing settlement at Hailey than the SASMNP area.

5.23 Upon consideration of the short-listed sites there are key points arising that influence the choices available to the Steering Group at this stage. Firstly, brownfield sites within the settlement boundary (free from significant constraints) are prioritised as part of the future growth strategy for the SASMNP area. These sites (Sites 5, 6, 32, 33) could together contribute around 15 homes towards the required need for 94 homes. Alongside this, the permitted/ completed sites that will be allocated (Sites 16, 28, 29, 30a, 30b, 36, 37, and 38) will further contribute an additional 24 homes. This leaves a residual requirement for 55 homes.

5.24 Greenfield sites within the existing settlement boundary become the next port of call, where Site 35 could contribute an additional 8 homes. With this contribution there is still a residual need for an additional 47 homes, making it clear that settlement expansion and a Green Belt amendment needs to form part of the future growth strategy for the SASMNP. Sites K&L (combined), C1, C2, C3, and NEW2 form the reasonable alternatives for settlement expansion.

5.25 From the choices available to the group, 4 options are derived, see **Table 5.2**. Option 1 presents a strategy based on progression of small sites. However, it is recognised that allocating Site K in isolation from Site L may be problematic and the option still falls slightly short of the identified need for 94 homes. Options 2-4 present alternative options for greenfield development at a single larger site.

5.26 Notably, both Option 3 and 4 would likely require bringing additional land within the inset settlement boundary to accommodate a logical extension to the settlement.

5.27 Whilst indicative figures have been identified in terms of housing numbers under Options 3 and 4, it is recognised that further negotiations with landowners may be able to secure a reduced scale development scheme at the larger sites, which aligns more closely with the identified need and community preference (i.e., a preference not to significantly exceed the identified target housing needs figure).

5.28 Furthermore, it is also recognised that a hybrid option or multiple combinations of further options could be formed but this would be disproportionate for the purposes of strategic assessment at this stage and would hinder clarity when informing subsequent plan-making decisions.

**Table 5.2: Housing supply and options for the SASMNP SEA**

Housing supply source	Option 1	Option 2	Option 3	Option 4
<b>Permitted/ completed sites to be allocated</b> (Sites 16, 28, 29, 30a, 30b, 36, 37, and 38)	24	24	24	24
<b>Brownfield sites within the settlement boundary</b> (Sites 5, 6, 32, and 33)	15	15	15	15
<b>Greenfield sites within the settlement boundary</b> Amwell Lane (Site 35)	8	-	-	-
<b>Settlement expansion options:</b>				

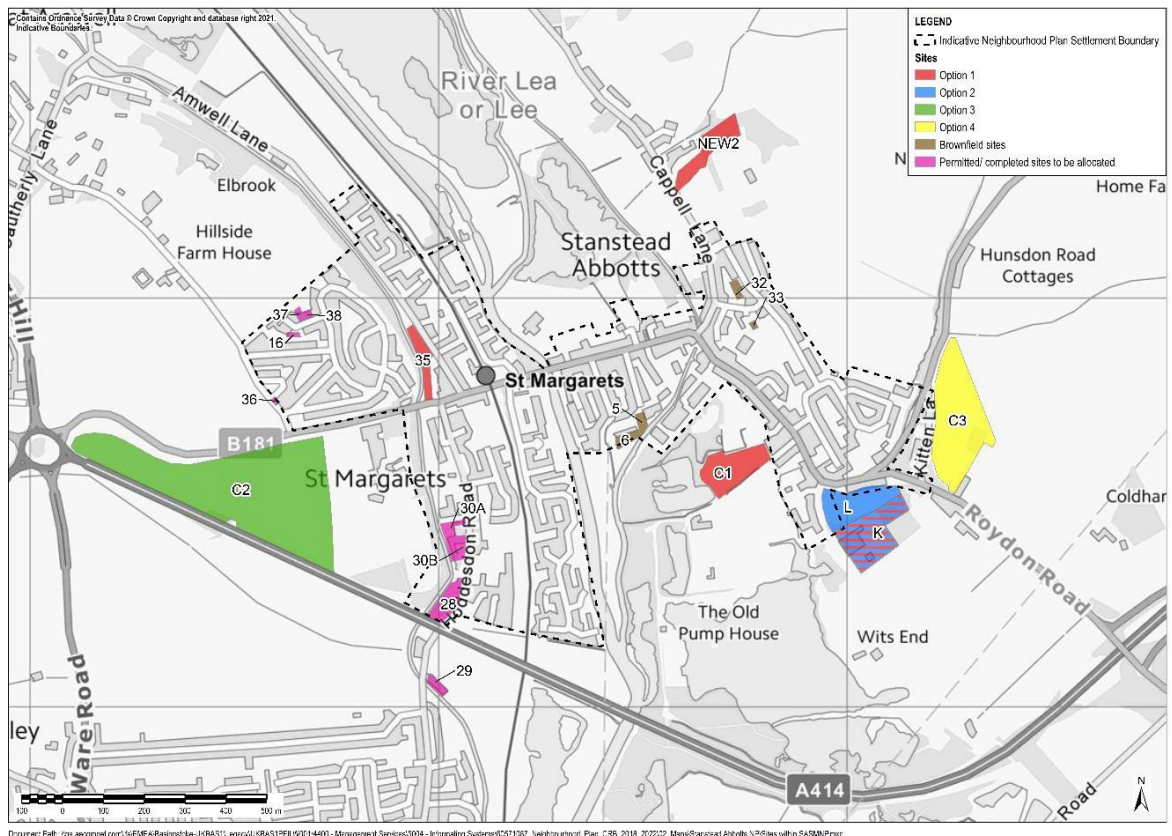
<b>Housing supply source</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>
Netherfield Lane (Sites K (brownfield) and L)	20*	60	-	-
Marsh Lane (Site C1)	18	-	-	-
Land south of Station Road (Site C2)	-	-	100	-
Roydon Road/ Hunsdon Road (Site C3)	-	-	-	114
East of Cappell Lane (Site NEW2)	15	-	-	-
<b>Total housing supply</b>	<b>92</b>	<b>99</b>	<b>139</b>	<b>153</b>

\*OPP at Site K included

# 6. Appraising alternatives

## Introduction

6.1 As outlined in the previous section, Options 1 to 4 are established as alternative options for the purposes of SEA. **Figure 6.1** below outlines the sites that are included in each option, alongside the brownfield sites and permitted/completed sites to be allocated which form a part of each option.



**Figure 6.1** Sites being taken forward for assessment

## Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see **Table 3.1**) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Where appropriate neutral effects, or uncertainty will also be noted. Uncertainty is noted with **grey** shading.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant

effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.

- 6.5 Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.<sup>9</sup> So, for example, account is taken of the duration, frequency, and reversibility of effects.

## Assessment findings

- 6.6 **Tables 6.1 to 6.8** below provide a comparative analysis of the four Options identified as alternatives, against each of the SEA themes established through scoping (see **Table 3.1**). Reference has not been made to the permitted/completed sites to be allocated as the Plan has limited scope to affect development at these sites. Instead, the brownfield and greenfield sites within the settlement boundary and settlement expansion options that make up each option are appraised.

**Table 6.1 Biodiversity and geodiversity assessment**

**SEA theme:  
Biodiversity and  
geodiversity**

	Option 1	Option 2	Option 3	Option 4
<b>Significant effect?</b>	No	No	No	No
<b>Rank</b>	2	1	1	1

- 6.7 Sites 35 and NEW2 (Option 1) are close to designated biodiversity sites Lee Valley Ramsar Site/ Special Protection Area (SPA) and Amwell Quarry Site of Special Scientific Interest (SSSI).
- 6.8 The corresponding SSSI Impact Risk Zones (IRZ) capture most development sites. With development of over 50 homes proposed at settlement expansion sites, Option 2, 3, and 4 require consultation with Natural England. Through the inclusion of Site NEW2 outside of the existing settlement area, Option 1 will also require consultation with Natural England.
- 6.9 A number of sites are adjacent to or in close proximity to Biodiversity Action Plan (BAP) priority habitat deciduous woodland, however Site NEW2 (Option 1) is the only site that contains deciduous woodland. In addition to this, Site 35 (Option 1) is located adjacent to Network Enhance Zone 2 to the north of the site, which forms a buffer around Amwell Quarry SSSI. In this respect, and due to the proximity of Sites 35 and NEW2 to designated biodiversity sites, Option 1 is ranked slightly less favourably than the other options. Minor negative effects are anticipated under Option 1 recognising the potential for habitat loss, however, no significant negative effects are deemed likely for any of the options.

<sup>9</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

**Table 6.2 Climate change and flood risk assessment**

**SEA theme:  
Climate change  
and flood risk**

	Option 1	Option 2	Option 3	Option 4
<b>Significant effect?</b>	<b>Yes - negative</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>

6.10 In terms of fluvial flood risk, Site 35 (Option 1) borders the New River to the west and falls within Flood Zone 2 and 3. However, the part of the site that falls within Flood Zone 3 benefits from flood defences. Site C1 (Option 1) borders a tributary of the River Lea to the south and falls within Flood Zone 2. Moreover, Site C1 is surrounded by Flood Zone 3, and unlike Site 35, this area covered by Flood Zone 3 does not benefit from flood defences. Sites L (Option 2) and K (Options 1 and 2) do not fall within a flood zone, but they are bordered by Flood Zone 2 to the west, and Site L borders a tributary of the River Lea to the north.

6.11 Sites 5 and 6 (common to all options) are also located within the floodplain, though predominantly in an area of low risk. Development may have the chance to improve drainage at brownfield sites and such benefits could be sought through the Plan process.

6.12 In terms of surface water flood risk, small sections of Sites 35 (Option 1) and L (Option 2) are within an area at low risk of surface water flooding. Although not within an area at risk of surface water flooding, Site C1 (Option 1) is surrounded by areas at low to high risk of surface water flooding. Development at Site C1 has the potential to exacerbate surface water flooding in these areas due to an increase in non-permeable surfaces, potentially increasing the risk at Site C1.

6.13 The incorporation of Sustainable Drainage Systems (SuDS) at sites with an increased risk of surface water flooding, and the addition/ improvement of flood defences at sites with an increased risk of fluvial flooding, will play an essential role in mitigating the risk of flooding at these sites. Nevertheless, due to the significant risk of flooding at Sites 35 and C1, Option 1 is ranked less favourably than the other options, with an identified potential for significant negative effects (pre-mitigation).

6.14 All options are considered to provide similar opportunities for delivering climate change mitigation measures which support low-emission, resource and energy efficient, and resilient development, and this is most likely to be guided by the existing policy context and the proposed SASMNP policy framework.

**Table 6.3 Health and wellbeing assessment****SEA theme: Health and wellbeing**

	Option 1	Option 2	Option 3	Option 4
Significant effect?	Yes - negative	No	No	No
Rank	3	2	1	2

- 6.15 Most notably site C1 under Option 1 contains designated open space in the EHDP and its loss could have potential impacts in relation to access to open space for existing residents unless re-provided elsewhere.
- 6.16 Site C2 (Option 3) is adjacent to St. Margaretsbury Recreation Ground, which contains a sports and social club, tennis club and cricket club amongst a large area of open green space. Site 35 (Option 1) is also located in good proximity to St. Margaretsbury Recreation Ground.
- 6.17 Sites 35 (Option 1), C1 (Option 1) and NEW2 (Option 1) are in good proximity to Stanstead Abbots Village Playground located just north of the High Street. These sites are also located close to the two allotment sites in the village. Moreover, these sites are located near to the High Street and services here, including Stanstead Abbots Dental Practice.
- 6.18 Sites K (Options 1 and 2), L (Option 2) and C3 (Option 4) also connect well with the eastern end of the village.
- 6.19 Brownfield sites are already relatively well connected in terms of footpaths. In relation to Public Rights of Way (PRoWs):
- Option 1: Site 35 is located next to a public footpath (Great Amwell 014) that follows the New River to the north. Site NEW2 is located next to a public footpath (Stanstead Abbots 005) and bridleway (Standstead Abbots 017) which connect to a network of PRoWs towards the east. Site C1 borders a public footpath (Stanstead Abbots 026) on all sides apart from the southern boundary (this may be impacted by development at this site).
  - Option 2: Site L borders a public footpath (Stanstead Abbots 012) to the north and bridleway (Stanstead Abbots 019) to the west, which extends south past Site K (which also forms part of Option 1).
  - Option 3: Site C2 contains a restricted byway (Standstead St Margarets 001) which passes north to south through the site, connecting Stanstead Abbots to Hertford Heath in the west.
  - Option 4: Site C3 is not located immediately next to any PROWs.
- 6.20 Option 1 could result in the loss of open space, where the potential for negative effects of significance are identified, and the option is ranked least favourably accordingly. Option 3 provides better access to existing services, facilities, leisure and recreational areas, and active travel opportunities than Options 2 and 4 and is therefore ranked more favourably than these options. No significant negative effects are deemed likely under Options 2, 3, or 4, with no significant deviation from the baseline predicted. Options 2, 3, and 4 contain larger-scale development sites that could potentially lead to the delivery of new



facilities (such as new recreational areas) that could in turn contribute to more positive health outcomes.

### Table 6.4 Historic environment assessment

SEA theme:  
Historic  
environment

	Option 1	Option 2	Option 3	Option 4
Significant effect?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
Rank	2	2	1	2

6.21 Constraints are identified for each of the options as follows:

- Option 1:** The southern boundary of site NEW2 is located next to grade II listed building Hill House.<sup>10</sup> This site is also located close to the ‘stable block at Hill House and the cottage’ which is also a grade II listed building.<sup>11</sup> Site NEW2 also lies within the Stanstead Abbots Conservation Area, and Sites 35, K, and C1 border it. There is significant potential to affect the setting and significance of designated heritage assets. According to the Hertfordshire Historic Environment Unit, site K is also within an Area of Archaeological Importance.
- Option 2:** The northern boundary of site L is located next to grade II\* listed buildings ‘the Baesh Almshouses and attached forecourt wall’<sup>12</sup>, as well as 91 and 93 Royden Road<sup>13</sup>, and Fern Cottage Woodside<sup>14</sup>. Sites K and L also border the Stanstead Abbots Conservation Area. There is significant potential to affect the setting and significance of designated heritage assets. According to the Hertfordshire Historic Environment Unit, sites K and L are within an Area of Archaeological Importance and notably, residents are pursuing a dig this Spring.
- Option 3:** The Stanstead Abbots Conservation Area lies east of site C2, whilst not adjacent, large-scale development has the potential to affect the setting and views to and from of the conservation area.
- Option 4:** The western boundary of site C3 is located close to grade II listed building ‘Netherfield Cottages’ which is on the other side of Kitten Lane.<sup>15</sup> The southern half of the site is located close to another grade II listed building, ‘Gatescreen, piers and gates at the Coach House’<sup>16</sup>, and lies within the Stanstead Abbots Conservation Area. There is significant potential to affect the setting and significance of designated heritage assets.

6.22 Furthermore, the brownfield sites common to all options lie just outside of the Stanstead Abbots Conservation Area.

<sup>10</sup> Historic England (no date): ‘Hill House’, [online] available to access via [this link](#)

<sup>11</sup> Historic England (no date): ‘Stable block at Hill House and the cottage’, [online] available to access via [this link](#)

<sup>12</sup> Historic England (no date): ‘The Baish Almshouses and attached forecourt wall’, [online] available to access via [this link](#)

<sup>13</sup> Historic England (no date): ‘91 and 93 Royden Road’, [online] available to access via [this link](#)

<sup>14</sup> Historic England (no date): ‘Fern Cottage Woodside’, [online] available to access via [this link](#)

<sup>15</sup> Historic England (no date): ‘Netherfield Cottages’, [online] available to access via [this link](#)

<sup>16</sup> Historic England (no date): ‘Gatescreen, piers and gates at the Coach House’, [online] available to access via [this link](#)

- 6.23 According to the Historic Environment Record (HER)<sup>17</sup>, the building Warrax House and scheduled monument ‘undated earthwork, Warrax Park’ are located north of Site NEW2 (Option 1). With regards to Sites K (Options 1 and 2) and L (Option 2), the HER defines a large area for Netherfield House, which meets the eastern boundary of both sites. The HER also identifies monument ‘Cat’s Hill’ near Site C3 (Option 4), located next to listed building Netherfield Cottages.
- 6.24 Considering the above, Option 3 is considered the least constrained option in relation to the historic environment (and is thus ranked most favourably), whilst recognising that mitigation would still be required to reduce the impacts of development at site C2, particularly in relation to the setting of the conservation area. All options have a notable potential for negative effects of significance that would need to be addressed through appropriate mitigation strategies in consultation with Historic England.

**Table 6.5 Land, soil, and water resources assessment**

**SEA theme: Land, soil and water resources**

	Option 1	Option 2	Option 3	Option 4
<b>Significant effect?</b>	No	No	No	No
<b>Rank</b>	2	1	2	2

- 6.25 All options involve an element of brownfield and greenfield development.
- 6.26 In relation to greenfield development, the Agricultural Land Classification (ALC) assessment<sup>18</sup> classifies agricultural land on Site C2 (Option 3) as ‘Very Good’, and agricultural land on Sites C3 (Option 4) and NEW2 (Option 1) as ‘Good to Moderate’. The Best and Most Versatile (BMV) agricultural land classification<sup>19</sup> similarly indicates that Sites C2 (Option 3), C3 (Option 4) and NEW2 (Option 1) have a high likelihood of being underlain by BMV land (>60% area).
- 6.27 Option 2 performs notably better, with most development at the Netherfield Lane site (sites K and L) falling within an area of non-agricultural use.
- 6.28 All options fall within the Lee Nitrate Vulnerable Zone (NVZ) and a Drinking Water Safeguard Zone (DWSZ) for Surface Water. Sites 35 (Option 1), C1 (Option 1), C2 (Option 3) and NEW1 (Option 1) also fall either entirely or partially within a DWSZ for Groundwater. Whilst significant effects are likely to be avoided given wider regulatory and policy frameworks, a requirement for mitigation to ensure development does not impact upon water quality is noted.
- 6.29 In relation to minerals, the Hertfordshire Minerals and Waste Development Framework<sup>20</sup> identifies Rye Meads (Stanstead Abbots) in its list of Safeguarded Waste Sites. However, Rye Meads lies south of the village, away from all options.

<sup>17</sup> Heritage Gateway (no date): ‘More detailed search’, [online] available to access via [this link](#)

<sup>18</sup> Natural England (2010): ‘Agricultural Land Classification map Eastern Region (ALC008)’, [online] available to access via [this link](#)

<sup>19</sup> Natural England (2017): ‘Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map Eastion Region (ALC020)’, [online] available to access via [this link](#)

<sup>20</sup> Hertfordshire County Council (2021): ‘Hertfordshire Minerals and Waste Development Framework’, [online] available to access via [this link](#)



6.30 By potentially avoiding the loss of high-quality agricultural land, Option 2 is judged to perform better and ranked most favourably. Through the inclusion of greenfield development, all options are considered likely to lead to minor long-term negative effects, and these effects are exacerbated under Options 1, 3, and 4 recognising the potential for higher quality agricultural land losses within them.

**Table 6.6 Landscape assessment**

SEA theme:  
Landscape

	Option 1	Option 2	Option 3	Option 4
Significant effect?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
Rank	1	1	3	2

6.31 All options perform positively through inclusion of an element of brownfield development within the existing settlement boundary. Despite this, all options require an element of Green Belt development. With regards to the options the following points are made:

- **Option 1:** This option reduces the extent of development beyond the settlement boundary. However, the sites K and NEW2 do not relate well with the settlement boundary. The option does not contribute to coalescence. Sites C1 and K form part of the Lee Valley Regional park where landscape sensitivity could be increased. Site C1 also contains designated open space (designated within the EHDP).
- **Option 2:** This option directs most growth to the Netherfield Lane site (Sites K and L) where a logical extension can be made to the settlement boundary in the south east. The option does not contribute to coalescence and the site is brownfield in part. The option does however, form part of the Lee Valley Regional park where landscape sensitivity could be increased. Notably the site has a much greater housing capacity, meaning there is good opportunity for sensitive design in the smaller scale scheme being proposed.
- **Option 3:** This option directs most growth to site C2 in the west of the settlement. Site C2 does not relate particularly well to the existing settlement boundary and is situated on higher ground than the existing settlement sloping east towards the village. Including the land between the site and Hoddesdon Road would make a more logical extension to the settlement boundary, bringing Amwell View School and Specialist Sports College within the boundary at the same time. The option lies directly within the SASMNP's proposed strategic gap, where the retention of open countryside is sought between Stanstead St Margarets and Great Amwell, and Stanstead St Margarets and Hoddesdon. Development at this option would contribute to the coalescence of Stanstead St Margarets with Great Amwell unless the site was significantly reduced in scale (avoiding development in the western half). A smaller scale scheme could provide opportunity for more sensitive design.
- **Option 4:** This option directs most growth to the east beyond Kitten Lane. Site C3 is located on higher ground than the existing settlement sloping

west towards the village. The option would bring Kitten Lane within an extended settlement boundary and would not contribute to coalescence.

6.32 All the options involve an element of greenfield and Green Belt development, where there are identified landscape sensitivities. Due to its contribution to coalescence and impacts relating to development on higher ground, Option 3 is ranked least favourably and a potential for negative effects of significance is identified. As a result of development on higher ground, Option 4 is ranked next and again, the potential for negative effects of significance is identified. Due to landscape sensitivity associated with the Lee Valley Regional Park, potential negative effects of significance are also identified under Options 1 and 2, though these are ranked more preferably overall. This reflects a greater potential for mitigation to reduce the significance of impacts under these options.

**Table 6.7 Population and communities assessment**

**SEA theme:  
Population and  
communities**

	Option 1	Option 2	Option 3	Option 4
<b>Significant effect?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>Yes - positive</b>
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>

6.33 Each option is considered likely to lead to significant positive effects for population and communities through their contribution to meeting the identified residual housing needs, and affordable housing needs, either alone or in combination. However, affordable housing needs are likely to be more difficult to achieve in Option 1 due to the relatively small number of homes proposed for each site.

6.34 In addition to this, Options 2, 3, and 4 provide increased opportunities for infrastructure upgrades or enhancements due to their inclusion of larger sites. This could include new open space to support the growing population. Due to this, and their ability to better meet affordable housing needs, Options 2, 3, and 4 are ranked more favourably than Option 1. Option 1 is ranked least favourably and is deemed less likely to deliver a broader range of housing types/ tenures.

**Table 6.8 Transportation and movement assessment**

**SEA theme:  
Transportation and  
movement**

	Option 1	Option 2	Option 3	Option 4
<b>Significant effect?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Rank</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>

- 6.35 All options will lead to increases in vehicle use on the local road network and minor negative effects can be anticipated.
- 6.36 Stanstead Abbots is well connected to the transport network, with several bus routes connecting the village to surrounding towns as well as a train station, St Margarets, which is on the Hertford East to London Liverpool Street line and connects the village to the East of England. London is accessible via train in approximately 45 minutes, and it is likely that many residents in Stanstead Abbots commute here for work.
- 6.37 All options involve settlement edge development and whilst further from the centre, still largely accessible to the train station and services within a 15 to 20-minute walk. Sites 35 (under Option 1) is notably more centrally located providing excellent access to the train station.
- 6.38 All options provide good potential to connect with existing footpaths and cycle ways, and through inclusion of larger scale development sites, Options 2, 3, and 4 may provide opportunities to enhance infrastructure to some extent. These options (through economies of scale) also provide greater potential to address any localised impacts to the road network. On this basis, Options 2, 3, and 4 are ranked more favourably than Option 1. No significant effects are anticipated at this stage, with near 100 new homes already planned for in Stanstead Abbots through the EHDP.

## Summary of findings

6.39 **Table 6.9** below summarises the findings of the assessment.

**Table 6.9 Summary of the findings of the assessment of alternative options**

### Summary findings

		Option 1	Option 2	Option 3	Option 4
<b>Biodiversity</b>	<b>Significant effect?</b>	No	No	No	No
	<b>Rank</b>	2	1	1	1
<b>Climate change</b>	<b>Significant effect?</b>	Yes - negative	No	No	No
	<b>Rank</b>	2	1	1	1
<b>Health and wellbeing</b>	<b>Significant effect?</b>	Yes - negative	No	No	No
	<b>Rank</b>	3	2	1	2
<b>Historic environment</b>	<b>Significant effect?</b>	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	<b>Rank</b>	2	2	1	2
<b>Land, soil and water resources</b>	<b>Significant effect?</b>	No	No	No	No
	<b>Rank</b>	2	1	2	2
<b>Landscape</b>	<b>Significant effect?</b>	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	<b>Rank</b>	1	1	3	2
<b>Population and communities</b>	<b>Significant effect?</b>	Yes - positive	Yes - positive	Yes - positive	Yes - positive
	<b>Rank</b>	2	1	1	1
<b>Transportation and movement</b>	<b>Significant effect?</b>	No	No	No	No
	<b>Rank</b>	2	1	1	1

6.40 Overall Option 1 is notably more constrained than the other options and this relates to development within an area of medium to high fluvial flood risk as well as the potential loss of an area of open space.

6.41 All options have landscape and historic environment sensitivities which will require mitigation to reduce the significance of effects. Such mitigation is considered likely to be more effective in relation to landscape under Options 1 and 2.

6.42 All options are likely to lead to significant positive effects in relation to the population and communities theme, by allocating land to meet the forecasted housing needs over the Plan period. However, it is recognised that Option 1 is formed of smaller sites which are less likely to deliver a range of housing types and tenures, with implications for the delivery of affordable housing.

## 7. Identifying the preferred approach

7.1 The SASMNP Steering Group's reasons for developing the preferred approach considering the assessment are identified below:

*“The alternative options assessment demonstrates the issues with Option 1 by identifying likely significant negative effects in four categories, whilst the other options only show this to be the case for the Historic Environment and Landscape. This supports the Steering Groups conclusion not to base the SASM Neighbourhood Plan site allocations on just the brownfield portion of the Netherfield Lane site and including Marsh Lane and Cappell Lane as options in addition to Amwell Lane. In addition, the site in Marsh Lane has considerable constraints and the site in Cappell Lane was not put forward by the landowner at any point during the preparation of the Plan.*

*In terms of the relative merits of the remaining three Options 2, 3 and 4, the overall rankings of the sites show Option 2 to be ranked more slightly higher with a score of 10 as against Option 3 with a score of 11 and Option 4 as a score of 12.*

*From the point of view of the SASM Steering Group, there are issues for the settlement boundary in the case of Options 3 and 4. Site C2 would involve the significant extension of the settlement boundary to include St Margaretsbury and in the case of Site C3, it would encompass Kitten Lane and an important piece of common land, plus an extension of the settlement northwards on Hunsdon Road.*

*Considering the above, the preferred option is to allocate the larger Netherfield Lane site (Option 2) supported by smaller sites within the settlement boundary which have already or are likely to be developed over the plan period.”*

## **Part 2: What are the SEA findings at this stage?**

## 8. Introduction (to Part 2)

8.1 The aim of Part 2 is to present appraisal findings and recommendations in relation to the submission version of the SASMNP. This part of the report presents:

- An outline of the Plan contents, aims, and objectives.
- An appraisal of the Plan under the eight SEA theme headings.
- Consideration of cumulative effects; and
- The overall conclusions at this stage.

### SASMNP Policies

8.2 The SASMNP proposes 31 policies to guide future development in the neighbourhood area, the policy list is presented in **Table 8.1**.

**Table 8.1: SASMNP policies**

Policy reference	Policy name
SASM H1	Village and Green Belt Boundary
SASM H2	Housing Numbers
SASM H3	Land east of Netherfield Lane/ south of Roydon Road
SASM H4	Site H6: Chapelfields and Abbots Way Garages
SASM H5	Brownfield Land and Windfall Sites
SASM H6	Type and Mix of Housing
SASM D1	Design of Development
SASM D2	Housing Density
SASM D3	Amenity
SASM D4	Residential Amenity Space
SASM R1	Riverside Development
SASM R2	Floating Structures
SASM HA1	Heritage Assets
SASM HA2	Non-designated Heritage Assets
SASM HA3	Archaeology
SASM HA4	Protected Views
SASM NE1	Local Green Space (LGS)
SASM NE2	Nature Conservation
SASM NE3	Valued Hedgerows and Trees
SASM NE4	Environmental Impact of Flooding
SASM CL1	Existing Community Facilities
SASM CL2	New Leisure Facilities
SASM CL3	New Facilities

Policy reference	Policy name
SASM B1	Local Employment Areas
SASM B2	The High Street
SASM B3	Flexible Working
SASM B4	Farm Diversification and Tourism Related Business
SASM TR1	Safe and Sustainable Transport
SASM TR2	Traffic Impact of Major Development
SASM TR3	Parking Standards
SASM IM1	Spending Priorities

## Methodology

- 8.3 The assessment identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is possible to comment on merits (or otherwise) of the submission plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect ‘characteristics’ are described within the assessment as appropriate.



## 9. Appraisal of the SASMNP

### Plan contents, aims, and objectives

- 9.1 A key aim of the SASMNP is to identify land to deliver the forecasted housing need over the Plan period. This need is identified through the East Hertfordshire District Plan (EHDP) as 94 homes in the period up to 2033. Accommodating these homes entirely within the existing settlement boundary is not an option for the SASMNP as there are not enough suitable sites, and on this basis, planning for a Green Belt boundary amendment at the settlement edge has become a necessary proposal in the development of the Plan.
- 9.2 The SASMNP Policies SASM H1 to H5 identify the spatial strategy of the Plan, which includes allocations at the following locations:
- Land east of Netherfield Lane/ south of Roydon Road for approximately 60 homes (Policy H3).
  - Two garage sites on Abbots Way for approximately 7 homes (Policy H4).
- 9.3 The remainder of the housing need has been met through sites completed since adoption of the EHDP (25 homes), and windfall sites (of which six are expected) (Policy H9).
- 9.4 The SASMNP highlights that paragraph 70 (d) NPPF (2023) supports a windfall allowance to be included to meet the housing target. “A windfall allowance anticipates future development that is currently unidentified. It is necessary to include a windfall allowance in this Plan because there are not enough acceptable sites made available by landowners for development within or adjacent to the village development boundary. To support a windfall allowance, there must be evidence that such developments are likely to come forward within the village development boundary.” This evidence is provided within the SASMNP (Policy H2 supporting text).
- 9.5 The Netherfield Lane site (Policy H3) is the largest allocation site in the Plan and the only site that will require a Green Belt boundary adjustment. It is in the south east of the settlement area off Roydon Road.
- 9.6 A key consideration in relation to Green Belt boundary amendment has been the role of the land and its relationship with the settlement and settlement edge. Crucially, the Netherfield Lane site can allow for settlement expansion whilst protecting important countryside gaps that lie between Stanstead Abbots and Great Amwell, and between Stanstead Abbots and Hoddesdon.
- 9.7 Alongside the site allocation policies, Policies SASM H10 seeks to guide housing delivery in relation to housing type, mix, and tenures, and Policies SASM D1 to D4 seek to influence development design. Additional development guidance has been proposed in relation to riverside development, including floating structures (Policies SASM R1 and R2).
- 9.8 Another important element of the spatial strategy relates to economic development supporting a thriving local community. The EHDP identifies three local employment areas within the neighbourhood area, which the SASMNP in turn seeks to further protect and enhance. The SASMNP extends proposed policies in relation to business and employment (Policies SASM B1 to B4)

seeking to provide further protection for the High Street, and support for farm diversification and tourism related business, and to accommodate greater levels of home working/ flexible working. In this respect, the SASMNP responds to immediate uncertainties in relation to working patterns, which have undergone significant change since the start of the pandemic. In particular, the importance of thriving High Streets supporting local communities has been brought to the forefront through recent years, and many local businesses have been significantly impacted by previous lock-down measures. Policy SASM B2 (The High Street) recognises the importance of accommodating changing retail requirements, and creating a mix of retail, commercial, leisure, and community uses within the High Street to ensure its long-term viability and vitality.

- 9.9 Accessibility and movement are also important considerations for the proposed spatial strategy. The neighbourhood area benefits from its strategic links to nearby Hoddesdon, Hertford, and Ware, connecting residents with higher tier settlements and employment opportunities. The nearby A10 also provides a direct connection to London. Rail access is provided at St Margarets Station, and the settlement contains services and facilities which provide a degree of self-containment. Policies CL1 to CL3 seek to protect and enhance services and facilities that support self-containment, and Policies TR1 to TR3 identify the transport priorities in accommodating growth.
- 9.10 Recognising that the neighbourhood area has a valued historic environment, objectives of the SASMNP are to “*deliver accessible guidance and information to inform residents about heritage requirements and assets in the Neighbourhood Plan Area*” and “*identify specific designated and non-designated heritage assets and provide for their protection*”. Proposed Policies SASM HA1 to HA4 seek to address these objectives, notably providing additional policy protections for identified non-designated assets across the settlement area, ‘Areas of Archaeological Significance’, and identified important views into and from the designated conservation area.
- 9.11 The plan further seeks to protect and enhance the natural environment through policies NE1 to NE4. Notably this includes additional protection in terms of managing surface water, additional protection for hedgerows and trees (as important landscape features), and the identification and protection of Local Green Spaces.

## Appraisal of the SASMNP

### Biodiversity and geodiversity

9.12 Growth in the neighbourhood area is immediately constrained by the proximity of the internationally designated biodiversity site Lee Valley Ramsar site and Special Protection Area (SPA). A Habitats Regulations Assessment (HRA) has been undertaken to assess the likely significant effects of the SASMNP in relation to this site. The HRA has concluded following Appropriate Assessment that, with the implementation of East Herts District Plan Policy WAT6, the NP would contain sufficient policy framework to ensure no adverse effects on the integrity of European sites will occur in isolation or in combination with other plans and projects.

- 9.13 Rye Meads Site of Special Scientific Interest (SSSI) lies within the Lee Valley site, no direct impacts are considered likely given the A414 lies between the designated site and the settlement area, however, the Netherfield Lane site is captured as part of its Impact Risk Zone as a type of development requiring further consultation with Natural England (NE). The Regulation 14 consultation response provided by NE on the draft SAMNP highlighted the particular sensitivity of Rye Meads SSSI to recreational and water discharge pressures, lying downstream of the Netherfield Lane site. In addition to this, NE raised the likely in-combination pressures from larger developments in the area are causing recreational, water quality, and air pollution issues for the Lea Valley SPA as a whole.
- 9.14 NE further recognise that sections of the Netherfield Lane site include green space and trees that are linking two areas of deciduous woodland containing priority habitat. The emerging Living England Habitat Map<sup>21</sup> identifies that the Netherfield Lane site (Policy H3) is likely to support grassland and woodland habitats but is largely surrounded by built up areas. The area is not identified as part of any National Habitat Network enhancement or expansion zones.
- 9.15 NE recommend that any future proposals should focus on existing hard surfaces/developed areas where possible and ensure that existing green corridors are not compromised and continue to provide connectivity to those priority habitats. This is reflected through the submission Neighbourhood Plan policy H3 (Land East of Netherfield Lane), stating that *“Layout should accommodate the retention of all existing trees and hedgerows (see also Policy NE3) to minimise the impact of loss of countryside and achieve a net gain in biodiversity and enhance connectivity to habitats at Stanstead Innings.”* It is noted in this respect that all development proposals (with or without the SASMNP) are also now expected to deliver demonstrable 10% net gains in biodiversity in support of nature recovery (in line with the Environment Act 2021).
- 9.16 The Netherfield Lane site also notably lies close to Amwell Quarry and Hunsdon meads SSSIs, with accessible public rights of way to both sites. No particular concerns were raised by NE in respect of these designated sites, and it is considered that the policy provisions of the SASMNP provide suitable protection and enhancement measures; supplementary to that of the higher-level planning policy framework.
- 9.17 Site allocation Chapelfield and Abbots Way (Policy H4) performs well in relation to biodiversity objectives. NE welcome plans to retain trees on site and uplift the area with additional green infrastructure.
- 9.18 More widely, the Natural Environment and Green Infrastructure section of the SASMNP performs well in relation to biodiversity objectives. ‘Cherished green spaces’ are designated as Local Green Spaces (LGS), offering a greater level of protection and future enhancement, and specific reference is made to biodiversity enhancement through ‘wildflower recovery areas’, provision of bat boxes, and creation of new habitats of high value for wild birds. Addressing NE’s Regulation 14 consultation response, further Green Infrastructure opportunities are incorporated to the SASMNP through Policy D1, which requires the design of new proposals to respond to Green Infrastructure

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<sup>21</sup> DEFRA [Magic Map application](#) – with the Living England project led by Natural England

opportunities as set out in the Green Infrastructure Framework (NE, 2023) to improve environmental sustainability and protect nature.

9.19 Overall, it is considered that the updated policy mitigation provided through the NP and responding to NE's concerns are sufficient to avoid significant effects arising. Alongside the wider policy measures to enhance biodiversity in the neighbourhood area, broadly **neutral to minor positive effects** are considered most likely.

## Climate change and flood risk

9.20 Flood risk is a significant constraint for future growth in the neighbourhood area, with much of the built settlement vulnerable to the impacts of flooding. Highest risk areas are located within the floodplain of the River Lee, particularly east of the river between The Maltings and Marsh Lane. Road infrastructure is also particularly vulnerable to surface water flooding. The Netherfield Lane site (Policy H3) lies adjacent to medium and high fluvial and surface water flood risk areas. There is a need to be mindful therefore of future flood risk.

9.21 When considering the additional policy protections provided by SASM NE4 (Environmental Impact of Flooding), particularly the requirement for a Flood Risk and Water Management Plan showing a demonstrable reduction in surface water run-off, no significant effects are anticipated as a result of the proposed spatial strategy. The broad support provided through this policy for restoration of land within the floodplain is notably of positive influence.

9.22 The SASMNP does not contain proposals that significantly influence climate mitigation and carbon neutral targets. The level of growth within the neighbourhood area is set by the EHDP and there are limited opportunities for measurable changes in terms of per capita emissions. Wider policy directions which seek to increase levels of self-containment (e.g., through the development of new community facilities or adaptable spaces for homeworking) and expand green infrastructure have minor positive influences in relation to this theme.

9.23 Overall, with no significant deviations from the baseline anticipated, **broadly neutral to minor positive effects** are deemed most likely.

## Health and wellbeing

9.24 The neighbourhood area is considered conducive to positive health outcomes given it is rich in green and blue infrastructure which residents benefit from good access to. Most growth is directed to the Netherfield Lane site, which is located with excellent access to Abbots Lake housing the Yacht Club. New residents would be further supported with access to the marina, riverside paths, and open spaces as well as local services and facilities and the train station at an estimated 15-minute walk away. There are no significant proposals (or opportunities) for new facilities that lead to deviations in the baseline and **broadly neutral effects** are considered most likely in relation to this theme.

## Historic environment

9.25 Growth within and surrounding the settlement area is largely constrained by designated heritage assets. Any spatial strategy is deemed likely to put pressure on the conservation area, including via increased vehicle use and

congestion within it. Whilst development of listed buildings can be and is being avoided, the settings of these assets are still vulnerable to the proposed changes.

- 9.26 New sites are proposed adjacent to the conservation area. The larger scale development proposal at Netherfield Lane (Policy H3) is judged to have greatest potential for impacts, given the proposed development of around 60 homes at the edge of the conservation area and adjacent to listed buildings in the north off Roydon Road, including the Baesh Almshouses (Grade II\*). The site has greater capacity than it is being allocated for, and notably the SASMNP aims for additional space at the site to be given over to green infrastructure development with design concepts being “*sympathetic*” to heritage settings (Policy SASM H3). There is therefore likely to be good opportunities to design a scheme that minimises impacts on the settings of designated assets.
- 9.27 The identification and protection provided for important views to and from the conservation area (Policy HA4) also reduce the potential for impacts arising from the spatial strategy. The site is also identified by the Hertfordshire Historic Environment Unit as within an Area of Archaeological Importance and notably, residents are pursuing a dig this Spring which will inform significance and potential mitigation strategies for development.
- 9.28 In terms of Land East of Netherfield Land/ South of Roydon Road (Policy H4), the sites are small brownfield sites within the village boundary, and therefore design guidelines for this site focus on regeneration, which could positively affect nearby listed buildings. Design and materials are required to reflect the local vernacular, and trees will be retained with new planting and re-designed green space incorporated. This could improve the setting of nearby assets, supporting access to and understanding of their significance. Wider heritage protection policies which identify and protect non-designated heritage assets and areas of archaeological significance will also benefit this theme over the long-term.
- 9.29 Overall, it is recognised that the spatial strategy has the potential to impact heritage settings in the neighbourhood area. Whilst plan policies identify measures which help to reduce the significance of impacts, in the absence of detailed planning applications and further archaeological evidence, the overall effects remain **uncertain** at this stage, though are unlikely to be of significance given the mitigation in place.

## Land, soil, and water resources

- 9.30 All available brownfield sites form part of the spatial strategy for the SASMNP. As previously identified, accommodating 96 homes within the settlement boundary is not an option available to the SASMNP, and a Green Belt boundary amendment is a necessary proposal. On this basis, any spatial strategy for the SASMNP is deemed highly likely to lead to permanent minor negative effects in relation to soil resources, because of development of greenfield land that could potentially support arable use. With regards to the Netherfield Lane site (Policy H3), whilst greenfield, the southern extent has already gained outline planning permission, and with development in this section, the northern extent of the site would be surrounded by the built-up area significantly reducing its potential use as arable land. On this basis, and with the other new allocation sites located on brownfield land within the settlement boundary, the spatial strategy performs



well in avoiding loss of high-quality land that supports agricultural or mineral uses.

- 9.31 The effects of increased traffic along Netherfield Lane on water quality, in the vicinity of Abbots Lake and the River Lee beyond, need consideration in development. Policy SASM NE4 (Environmental Impact of Flooding) requires mitigation measures in major development proposals to avoid impacts arising in this respect, notably requiring demonstrable surface water runoff reductions.
- 9.32 The growth level proposed through the SASMNP aligns with that planned for through the EHDP in consultation with water companies. On this basis no departure from the baseline is anticipated in relation to water resources.
- 9.33 Overall, despite inevitable **permanent minor negative effects** arising from greenfield development, the spatial strategy and plan policies perform well in relation to this theme, particularly through avoidance measures.

## Landscape

- 9.34 The spatial strategy of the SASMNP maximises use of available brownfield sites within the settlement boundary. However, as noted previously, with the level of growth set by the EHDP and a Green Belt boundary amendment inevitable, there will no doubt be a degree of landscape impact in implementing any spatial strategy.
- 9.35 Most importantly, the SASMNP directs most growth to the Netherfield Lane site (Policy H3) and in doing so, avoids development within important/ strategic countryside gaps between Stanstead St Margarets and Great Amwell, and Stanstead St Margarets and Hoddesdon. The southern extent of the Netherfield Lane site has already gained outline planning permission for a mixed-use development, and the additional land in the north will contribute to connecting the new development area with the existing settlement area. In line with Policy H3, any part of the greenfield area of the site that is not required for housing or related infrastructure will include “a permanent, defensible, and landscaped boundary to contain the settlement edge and define the new Green Belt boundary.”
- 9.36 In terms of Chapelfields and Abbots Way Garages (Policy H6), the sites are brownfield land within the settlement boundary, and will support the positive regeneration of the area. A scheme for the sites must incorporate improvements to hard and soft landscaping, including creating usable connected green spaces, and “the design and layout of the development must relate sympathetically to the topography.”
- 9.37 Considering these points, the proposed spatial strategy is judged to perform well in relation to minimising potential landscape impacts.
- 9.38 Supported by the wider design policies of the plan, **minor long-term negative effects** are concluded as most likely in relation to the spatial strategy.
- 9.39 Notably in relation to the natural environment, important hedgerows and trees, and Local Green Spaces are identified and protected, recognising their contribution to biodiversity, settlement identity, and landscape character. **Minor positive effects** can be drawn on this respect.

## Population and communities

- 9.40 The SASMNP allocates land to deliver 67 homes over the plan period, contributing towards meeting the identified local housing need of 94 homes. In addition to site allocations, a small amount of housing (6 homes) is being met through windfall (Policy H5), reflective of completions within the village boundary over the last 10 years. It is anticipated that further windfall locations in areas such as Station Road, and the High Street, where conversions of upper floors to residential dwellings or demolition of single dwellings and erection of additional dwellings as well as conversion of single houses into multiple flats are likely to be forthcoming within the plan period. Other areas that could come forward include non-designated employment areas, should there be no identified demand for suitable alternative employment uses.
- 9.41 The remainder of the housing need has been met through sites completed since adoption of the EHDP (25 homes). This totals 98 homes, achieving a little more than the housing target of at least 94 homes, to future proof the Plan. The SASMNP therefore performs positively in relation to this SEA theme.
- 9.42 Additional policies which seek to align housing delivery with varied housing needs enhance these positive effects. Future residents will benefit from a good local service, leisure, and recreational offer, as well as strategic links to nearby higher tier settlements and employment areas, and London slightly further south.
- 9.43 The SASMNP proposes additional measures which will help to protect settlement identity and community cohesion in the long-term. This includes policy protection for strategic countryside gaps between Stanstead Abbots and Great Amwell, and between Stanstead Abbots and Hoddesdon, and retention of elements which define entries and exits into the village (e.g., important hedgerows or views to and from the conservation area).
- 9.44 Considering these points, **significant positive effects** are considered a likely outcome in relation to this theme.

## Transportation and movement

- 9.45 As a relatively well-connected settlement, containing a train station, growth with the neighbourhood area is judged strategically to perform relatively well in relation to this SEA theme. Notably, the proposed settlement expansion still lies with a 15 to 20-minute walk of the train station, and the settlement is served by local buses and a comprehensive network of footpaths/ public rights of way. Future residents will be supported by relatively good opportunities to use more sustainable modes of transport, as well as active travel opportunities and connections to surrounding countryside.
- 9.46 Supported by a reasonable range of existing services and facilities, a continued degree of self-containment is likely, alongside a continued reliance to some degree on higher-tier settlements nearby. In this respect, bus services connect the area with nearby Hoddesdon and Great Amwell, and rail services provide direct connections with London as a significant employment base.
- 9.47 In respect of major development proposals at the Netherfield Lane site (Policy H3), Policy TR2 requires a Traffic Impact Assessment which should ensure that localised impacts to the road network are sufficiently mitigated in development.

- 9.48 Further of note, SASMNP Policy TR1 seeks to protect and enhance active travel networks and increase their safety.
- 9.49 Overall, with growth anticipated in the neighbourhood area with or without the SASMNP, increases in vehicle use on local roads are an inevitable evolution of the baseline. Despite this the settlement is relatively well connected to support future residents with opportunities to use more sustainable modes of transport and provides a degree of self-containment. Supported by the policies of the SASMNP which seek to address any localised impacts of growth and enhance active travel opportunities, **minor long-term positive effects** are anticipated.

## 10. Conclusions and recommendations

- 10.1 Overall, the SASMNP is not judged likely to lead to any significant negative effects in relation to any of the SEA themes. Significant positive effects are considered likely through the proposed spatial strategy which meets the forecasted housing needs over the plan period. Notably the settlement area is well-connected in terms of its sustainable transport offer as well as its proximity to higher-tier settlements. In this respect future residents will be supported by local services and facilities, bus connections to nearby settlements, and rail connections to significant employment bases.
- 10.2 Minor negative effects are considered likely due to localised impacts in relation to landscape, and soil resources. This is largely due to an element of greenfield development which is inevitable in any spatial strategy for the plan.
- 10.3 Notably, impacts in relation to the historic environment at the Netherfield Lane site (Policy H3) are uncertain at this stage. However, there is notable potential for significant negative effects to be avoided through good design, supported by the policy requirements for significant green infrastructure enhancement at the site and design concepts which are sympathetic to heritage settings. A good way to ensure significant negative impacts are avoided in this respect is to develop the proposed masterplan for the site in consultation with Historic England.
- 10.4 With regards to biodiversity, it is considered that the updated policy mitigation provided through the NP and responding to NE's concerns are sufficient to avoid significant effects arising. Alongside the wider policy measures to enhance biodiversity in the neighbourhood area, broadly neutral to minor positive effects are considered most likely.

### Cumulative effects

- 10.5 Alongside the provisions of the EHDP and NPPF, the SASMNP seeks to support housing delivery in line with forecasted needs over the Plan period. **Positive cumulative effects** are anticipated in this respect.
- 10.6 By delivering a level of growth planned for through the EHDP, no cumulative impacts are anticipated in relation to broader river basin catchments and water resource management plans.



## **Part 3: What are the next steps?**

# 11. Next steps and monitoring

11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

## Submission

11.2 This SEA Environmental Report will accompany the SASMNP for submission to the Local Planning Authority, East Hertfordshire District Council, who will arrange further consultation (Regulation 16) and then Independent Examination.

11.3 At Independent Examination, the SASMNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

11.4 If the Independent Examination is favourable, the SASMNP will be subject to a referendum, organised by East Hertfordshire District Council. If more than 50% of those who vote agree with the SASMNP, then it will be 'made'. Once made, the SASMNP will become part of the Development Plan for the area.

## Monitoring

11.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

11.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by East Hertfordshire District Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the SASMNP that would warrant more stringent monitoring over and above that already undertaken by the District Council.

# Appendices

# Appendix A Regulatory requirements

As discussed in **Chapter 1**, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA.1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

**Table AA.1: Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements**

Questions answered		As per regulations... the Environmental Report must include...
<b>Introduction</b>	What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>• Relevant environmental protection objectives, established at international or national level</li> <li>• Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the SEA scope?	<ul style="list-style-type: none"> <li>• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>• The environmental characteristics of areas likely to be significantly affected</li> <li>• Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>• Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> <li>• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>• The likely significant effects associated with alternatives</li> <li>• Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the submission plan</li> </ul>
<b>Part 2</b>	What are the SEA findings at this current stage?	<ul style="list-style-type: none"> <li>• The likely significant effects associated with the submission plan</li> </ul>
<b>Part 3</b>	What happens next?	<ul style="list-style-type: none"> <li>• A description of the monitoring measures envisaged</li> </ul>

**Table AA.2: Questions answered by this Environmental Report, in-line with regulatory requirements**

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'baseline'?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> <b>[Part 1 of the Report]</b>
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> <b>[Part 2 of the Report]</b>
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> <b>[Part 3 of the Report]</b>

i.e. answer - *What's the scope of the SA?*

**Table AA.3: ‘Checklist’ of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.**

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 (‘What’s the plan seeking to achieve’) presents this information. The relationship with other plans and programmes is also set out in Appendix B (Scoping Information).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2021. The outcome of scoping was an ‘SA Framework’, and this is presented within Chapter 3 (‘What’s the scope of the SA’).
3. The environmental characteristics of areas likely to be significantly affected.	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The Scoping Report (2021) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an ‘SA framework’. The context review informed the development of the SA framework and topics, presented in Chapter 3, which provide a methodological ‘framework’ for appraisal. With regards to explaining “how... considerations have been taken into account” - <ul style="list-style-type: none"> <li>• Chapter 5 explains how reasonable alternatives were established in-light of available evidence.</li> <li>• Chapter 6 sets out the detailed appraisal of options.</li> <li>• Chapter 7 explains the Council’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors).</li> <li>• Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations.</li> </ul>
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term,	<ul style="list-style-type: none"> <li>• Chapter 5 explains how reasonable alternatives were established in-light of available evidence.</li> <li>• Chapter 6 sets out the detailed appraisal of options.</li> <li>• Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations.</li> </ul> <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/ dimensions.</p>

## Regulatory requirement

## Discussion of how the requirement is met

permanent and temporary, positive and negative effects).

7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

9. A description of the measures envisaged concerning monitoring in accordance with Article 10.

10. A Non-Technical Summary of the information provided under the above headings.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations: Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying SA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).

The SA Report must be taken into account, alongside consultation responses, when finalising the Plan. The SA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 6) and appraisal of the draft plan (Chapters 9 and 10).

Chapter 5 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options.

Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.

At this stage no additional monitoring measures are identified as being necessary over and above those already being considered by the Council.

A Non-Technical Summary (NTS) is provided separately.

An Environmental Report was published alongside the Regulation 14 draft plan and consulted on in 2022. At the current time, this Environmental Report is being published alongside the Regulation 16 submission version of the SASMNP for public consultation.

The Council have taken into account the SEA at all stages when preparing the SASMNP.



## Quality information

Prepared by	Checked by	Verified by	Approved by
Lisa Rigby Principal Ecologist	IHH Senior Ecologist	JR Technical Director	JR Technical Director

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## Revision History

Revision	Revision date	Details	Authorized	Name	Position
0	10/02/22	Draft for group review	JR	James Riley	Technical Director
1	25/02/22	Amendments following group comments (Jacqueline Veater)	JR	James Riley	Technical Director
2	08/04/22	Amendments following Client comments	JR	James Riley	Technical Director
3	May 2024	Amendments to reflect changes to NP	JR	James Riley	Technical Director

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<i>This Transport Statement has been prepared by Fieldgate Consultants on behalf of Stanstead Abbots Parish Council. The Parish Council are concerned about the cumulative highways impacts on Stanstead Abbots of proposed development including:</i> .....	1
<i>This Statement is a revised version of a Statement originally prepared in November 2020. This revision retains information on the last Tarmac submission regarding the quarry, but updates traffic accident data and responds to the latest Hertfordshire County Council draft allocation for Briggens Quarry.</i> .....	1
<i>A location plan showing the areas of the proposed Quarry, Gilston Village 7, and development on Netherfield Lane (as part of the draft Neighbourhood Plan allocations) is shown in Appendix A.</i> .....	1

*The proposed Briggens Estate quarry site has received a draft allocation MAS01 in the Minerals and Waste Plan for Hertfordshire County Council (HCC) and the site is being promoted by Tarmac. Gilston Village 7 is currently the subject of an outline planning application. The Draft Neighbourhood Local Plan allocations are currently under review. .... 1*

*This Transport Statement has been prepared according to the latest planning practice guidance on Travel Plans, Transport Assessment and Statements (Ministry of Housing Communities and Local Government March 2014). Reference is also made to Institute of Environmental Assessment Guidance Note 1 on The Environmental Assessment of Road Traffic..... 1*

*The contents of this Transport Statement are: ..... 1*

**Baseline Traffic Conditions ..... 2**

**Introduction ..... 2**

*This section considers the existing traffic issues in and around Stanstead Abbots including the concerns of the Parish Council..... 2*

**Stanstead Abbots ..... 2**

*Stanstead Abbots village boundary as described in the Draft Stanstead Abbots and St Margaret’s Neighbourhood Plan is shown on the plan in Appendix A. .... 2*

*The village can be accessed from the wider area by four main routes:..... 2*

*The village centre lies on B1812 High Street and includes a range of local shops, facilities and businesses. Stanstead St Margarets rail station lies towards the western High Street end and there is a level crossing across the High Street just by the station. There is a 30mph speed limit through the village and a weight limit banning lorries above 7.5 tonnes in the village except for access. The lorry ban sign locations are on each approach road as shown on the plan in Appendix A..... 2*

**Parish council highways concerns ..... 2**

*The key concerns of residents (as represented by the Parish Council) are:..... 2*

**The B181 Roydon Road ..... 2**

*The B181 Roydon Road provides access to Stanstead Abbots from the south and links the village with Roydon which lies approximately 2km south of Stanstead Abbots. The A414 dual carriageway is crossed by the B181 via a bridge roughly halfway between the two villages. There are east facing slips to and from the A414 either side of the bridge but no west facing slips. The Quarry site lies just north of the A414 bridge and south of Stanstead Abbots village as shown on the plan in Appendix A. The speed limit on the B181 changes from 30mph to the national speed limit (60mph) heading away from Stanstead Abbots part way along the Quarry site boundary. .... 2*

*The B181 is unlit between Stanstead Abbots and Roysdon. .... 3*

*The initial section of the B181 heading south from Stanstead Abbots from the B180 Hunsdon Road junction is known as Cat Hill and climbs steadily for about 300m southwards. Residents observe that traffic frequently speeds along this section which has a 30mph speed limit. .... 3*



**Department for Transport traffic flow data for this section of the B181 is included in Appendix B. This data shows that in 2009, Annual Average Daily (AADT) traffic was recorded as 4,910 vehicles of which 27 (or 0.5%) were HGVs. This low number of HGV probably reflects the lorry ban on this section of the B181 for all HGVs except those accessing the village. .... 3**

**At the A414 eastbound entry slip from the B181, there is a forward visibility for vehicles turning right into the slip of about 180m along the B181 kerb as shown on the plan in Appendix C. The visibility at the A414 exit slip road for vehicles turning out is poor, particularly for right turning traffic, being about 35m to the right and about 100m to the left at 2.4m back from the give way line, and about 30m and 90m respectively at 4.5m back from the give-way line (as required by Design Manual for Roads and Bridges (DMRB) document CD 123 on design of priority junctions). .... 3**

**Based on a speed limit of 60mph, a sight stopping distance should be provided of 215m (as set out in DMRB document CD109 on highway link design) and the visibilities at the exit and entry slips therefore do not achieve the necessary sight stopping distances for the speed limit. .... 3**

**The latest five-year accident data was provided by HCC, to June 2020, and is included in Appendix D. This anonymised data is basic and does not include details of accidents. However, some of the data was cross referenced with Crash Map and also data from the David Tucker Associates (DTA) Transport and Access Appraisal (TAA) for Tarmac (January 2018). The data showed that in the five years to June 2020 there were: .... 3**

**Crash Map has been used to update this accident information to the latest 5 years of data to June 2021. During the period from 2017 to 2021 there were: .... 3**

**There is clearly a pattern of accidents at the two slip road junctions of right turn accidents that, particularly in the case of the exit slip, might be linked to the poor visibility when exiting the slip road. .... 4**

**It is worth noting that: .... 4**

## **Gilston Village 7 ..... 5**

### **Introduction ..... 5**

**This section outlines the proposals for Gilston Garden Town and Gilston Village 7 and its potential impact on Stanstead Abbots. .... 5**

### **Harlow and Gilston Garden Town ..... 5**

**The proposals for Gilston Villages and the proposals for Harlow are set out in a range of documents including various planning applications for Gilston Villages and the Harlow Development Plan. Together, these changes can be encapsulated as the Harlow and Gilston Garden Town (known as “The Garden Town”). The proposals are for up to 10,000 new homes and are being planned jointly by Harlow District Council, East Hertfordshire District Council, Epping Forest District Council, Hertfordshire County Council and Essex County Council. The infrastructure required to deliver the Garden Town is set out in the Harlow and Gilston Garden Town Infrastructure Delivery Plan (HGGT IGP; April 2019). .... 5**

**The HGGT includes significant changes to the A414 corridor between Stanstead Abbots and Harlow including: ..... 5**

**The detail of these proposals can be found in section 3.5.3 of the HGGT IGP (pages 16 and 17) on Stortford River Crossings. The text states: ..... 5**

***“The existing Fifth Avenue crossing, between the Eastwick roundabout in EastHertfordshire and Burnt Mill roundabout in Harlow, has been identified for enhancement in the adopted East Herts District Plan (Policy GA2) and the Harlow Local Development Plan (Pre-Submission Publication) (Policy SIR1). The identified enhancement comprises dualling of the northbound and southbound carriageways and provision of a new footway/cycleway, which will form part of a north-south sustainable transport corridor through Harlow. .... 5***

***The dualling is for the purposes of providing dedicated public transport lanes, which together with the new footway/cycleway will form an extension of the planned Sustainable Transport Corridors. The existing highway capacity will remain broadly as presently provided. The works also include reconfiguration of the existing Eastwick roundabout to a signalised junction; in this regard, these works overlap with works to deliver the new Eastern Stort Crossing.”..... 5***

***These access improvements are indicated on the plan in Appendix E which includes plans illustrating the proposals..... 5***

**Gilston Village 7 ..... 6**

***Gilston Village 7 proposals are for 1,500 new residential dwellings and associated development including schools, shops and a local centre. The proposed Gilston Village 7 location is illustrated in Appendix A..... 6***

**Gilston Village 7 impact on Stanstead Abbots ..... 6**

***Local Stanstead Abbots residents are concerned about the potential for additional Gilston Village traffic within Stanstead Abbots. Concerns include new residents wishing to travel by train, choosing to use St Margaret’s rail station rather than Harlow or Roydon. This is issue has not been addressed within the Gilston 7 Transport Assessment, supporting the current outline application, which suggests that all train users will travel via either Harlow or Roydon Station..... 6***

***The distance to St Margaret’s Station from the centre of Gilton Village 7 by car is approximately 4.8km compared to around 3.5km to Harlow and 4km to Roydon. However, peak period travel times will be influenced by congestion and taking this into account may mean that St Margaret’s station is more convenient at certain times of day than Harlow or Roydon. The Gilston 7 Transport Assessment concentrates on rail station access by cycle or by bus. It appears that assumptions on rail travel do not include any use of private car to reach the station and therefore traffic impacts on any of the stations have not been considered. .... 6***

***The transport assessment also does not include Stanstead Abbots within its traffic impact assessment area. Therefore, it assumes that no vehicular traffic from Gilston Village 7 will access Stanstead Abbots. .... 6***

***The Parish Council requests that the potential for vehicular traffic accessing stations, including St Margarets, be considered. This should look at the potential for vehicular traffic and parking to impact upon Stanstead Abbots. .... 6***

**The Briggens Estate Quarry ..... 7**

**Introduction ..... 7**

***This section describes and comments on the proposed quarry development based upon information within various documents produced by Tarmac and on the MAS01 draft allocation comments. .... 7***

**Draft allocation comments on access and highways ..... 7**

***The draft allocation for the site comments on highways and access that: ..... 7***

***“Access to and from the site must be via the B181 (Roydon Road). The entrance to the site must be engineered so that traffic on Roydon Road cannot turn left into the site nor turn right out of the site, in order to prevent site traffic from travelling through Stanstead Abbots..... 7***

***The access strategy to the site will need to fully consider traffic movements between the A414 and the access to the site on the B181. Proposals will need to fully consider the interaction between site related traffic and other highway users, particularly people walking, cycling or riding a horse. Any proposals should include solutions which mitigate impacts on those users, ..... 7***

***Considerations should include, but not be limited to, the following:..... 7***

***- Any junctions proposed on the B181 must be designed to ensure that there are no residual safety concerns, designed to the appropriate standards and must be deliverable..... 7***

***- Consideration of and, if necessary, associated alterations to the existing bus stops on the B181..... 7***

***- Consideration should be given to vulnerable road users wishing to use the B181 and the impact of large numbers of HGVs using the route, with suitable alternative provision being made as appropriate ..... 7***

***- Potential re-opening of the west facing slip roads on the A414 with a suitable connection between the slip roads and the B181. This would require operational management of the slips to prevent non-site traffic, and suitable operational arrangements of the underpass under the A414 including consideration/mitigation of any impacts on bridleway Stanstead Abbots 019. .... 7***

**Avoiding HGV Routing through Stanstead Abbots ..... 7**

***As set out above, the latest draft allocation for Briggens Quarry requires that no traffic may enter the quarry from or leave the quarry towards Stanstead Abbots, through design of the access to prevent left turns in or right turns out..... 7***

***It is vital that any access be designed as stated in the draft allocation to prevent traffic turning towards or coming in from Stanstead Abbots as requested by the Parish Council..... 7***

***It is also vital that vehicles travelling to the site have adequate information about the left in ban from the west, including the access design preventing this turn. Otherwise, HGV drivers may still attempt to travel through the village to access the site. .... 8***

**Quarry access and impact on the B181 Roydon Road ..... 8**

***The applicants for the Briggens Estate Mineral Extraction Site (or Briggens Estate Quarry) are Tarmac. Tarmac proposes to extract around 500,000 tonnes of sand and***

<b>gravel aggregate and potential import of inert material. ....</b>	<b>8</b>
<b>A TAA Report prepared and submitted to the Hertfordshire Minerals Local Plan Review in 2018 states (paragraphs 4.1 and 4.2) that: .....</b>	<b>8</b>
<b>“it is assumed that the extraction could generate in the order of 90 loads (i.e 180 movements) per day. Allow for a worse case similar level of importation of material for restoration (180 movements) and RMX traffic (40 movements) a total of 400 movements per day area assumed at this stage. Staff movements will be limited to half a dozen cars in and then out per day.....</b>	<b>8</b>
<b>In practical terms this could equate to around 40 movements (20 in and 20 out) in any one hour.” .....</b>	<b>8</b>
<b>The impact of the Quarry will therefore be an additional 400 daily HGV movements on the B181 local to the site and around 12 daily car movements. ....</b>	<b>8</b>
<b>This TAA describes the local road network close to the proposed site access onto the B180 Roydon Road, including a review of 5 year accident data and states that: ..</b>	<b>8</b>
<b>This original TAA did look at 5 year accident data which is included in Appendix A of the TAA and concluded no particular accident hot spots or patterns, although no analysis of the accidents is actually given and so it is assumed that this conclusion is reached by looking at the plan, rather than reviewing individual accidents.....</b>	<b>8</b>
<b>In discussing the existing road network, the TAA states (paragraphs 2.1 and 2.2):....</b>	<b>8</b>
<b>“The site is located adjacent to and will be accessed from the B181. In the vicinity of the site this is a 7.3m wide single carriageway road with a generally straight alignment.....</b>	<b>8</b>
<b>Approximately halfway along the site frontage, the speed limit reduces from the mandatory national limit to 30mph. There is a gateway feature with a central refuge and road markings at this point. The road has a 1.2m wide footway on the southern side. ....</b>	<b>8</b>
<b>And (paragraphs 3.2, 3.3 and 3.4):.....</b>	<b>9</b>
<b>“In terms of the general form of the access junction, the number of vehicles turning into and out the site will be relatively modest. Whilst the road is derestricted with mainline through traffic moving relatively slow given the location of the 30mph zone. ....</b>	<b>9</b>
<b>Assessment of the site access from 2006 confirmed vehicle speeds to be in the order of 43mph (85th Percentile). Recent visits to the site confirm that there is unlikely to be any significant change from that previous survey. For robustness it is assumed that the design speed would be 85 kph (53mph), although that could be reduced at the detailed design stage. ....</b>	<b>9</b>
<b>TD42/95 requires a ghost island right turn lane for flows on the mainline over 13,000 AADT and on the minor road of 500 AADT. Neither of these thresholds are breached in this case and as set out above approach traffic speeds relatively modest. No ghost island right turn lane is thus considered necessary.” .....</b>	<b>9</b>
<b>Although the TAA refers both to speeds and to the fact that traffic flow is lower than</b>	

**13,000 AADT (implying that data is available), neither speed data nor traffic flow data is included with the report. .... 9**

**DfT data included in Appendix B shows AADT traffic flows in 2009 to be around 5,000 vehicles. On a recent site visit in October 2020, a sample survey on the B181 close to the proposed access point showed speeds in excess of 50mph. This sample was not statistically conclusive, being only for a few minutes. However, it does not concur with the report which states much lower speeds of 43mph 85<sup>th</sup> percentile. The report does not make clear where the 43mph speed was measured and its possible that the site visit observations were at a different location. .... 9**

**The TAA comment that speeds may be lower due to the proximity of the 30mph speed limit zone being “half-way along the site frontage” are misleading. The 30mph speed limit is 150m from the proposed access, which may impact upon the speed of traffic approaching the proposed access from Stanstead Abbots direction but will have no impact upon the speed of traffic approaching from the A414 direction. Note that from this direction, the required sight line of 215m (based on the speed limit) is measured to the nearside kerb to allow for overtaking traffic. .... 9**

**Accurate, up to date traffic flow and speed data, measured at the appropriate points on the B181, is critical to independent corroboration of the suitability of the proposed Quarry access. The Parish Council therefore requests that this information be provided and suitably assessed as part of the HCC Minerals Local Plan Review. Given the fundamental importance of access, such information should not wait until a planning application before being presented..... 9**

**Paragraphs 2.4 and 2.5 of the TAA state: ..... 9**

**“To the south east of the site frontage, the B181 connects to the A414 at a grade separated junction with north facing slips only..... 9**

**The junction with the northbound (on) slip road has been designed in accordance with the DMRB. It has a segregated left turn filter lane and visibility to and from the junction is good. The southbound (off) slip has a dedicated left and right turn lane and generous visibility.” ..... 9**

**These TAA comments about the exit and entry slips to the A414 are misleading. Whilst the on-slip might meet DMRB standards of visibility if the speeds are 50mph or below, the comment about the southbound off slip having “generous” visibility is wrong. Not only are visibilities sub-standard but they are very poor, with a visibility to the right of 30m compared to a required minimum of 160m and possibly 215m depending upon measured speeds..... 10**

**Assessment of the poor visibility on the exit slip as an accident risk, is supported by an accident record for this junction. There were 4 accidents in the latest 5 years, at least 3 of which were right turn accidents and one of which was serious. It is recognized that accident data presented in the TAA of January 2018 did not show such a strong accident pattern. However, the David L Walker Traffic Access and Options report (May 2020) paragraph 2.8 states:..... 10**

**“in principle, it has been established that this short stretch of the B181 is capable (in safety and capacity terms) to handle the amount of HGV traffic that the proposed scheme could generate.” ..... 10**

**This statement is no longer supported by the accident data to date in 2021. .... 10**

**The TAA states (paragraph 1.4) that: ..... 10**

**“The methodology adopted in the appraisal of impact takes into account the guidance within the National Planning Policy Guidance notes, the Department for Transport’s Guidance on Transport Assessments (2007, withdrawn 2012) and the Institute of Environmental Management and Assessment (IEMA) Guidance Note No1 “Guidelines for the Environmental Assessment of Road Traffic”. ” ..... 10**

**The IEMA guidance recommends separate assessment of links where either the traffic flows or HGV flows have increased by more than 30%. The increase on the B181 is forecast to be more 14 fold (from 27 to 428 per day) and so requires a detailed environmental impact assessment for the B181 along the length affected from the Quarry to the A414. One of the key environmental impacts to be assessed along this section is accident risk. IEMA Guidance says (paragraph 4.42): ..... 10**

**“Where a development is expected to produce a change in the character of traffic (eg. HGV movements on rural roads), then data on existing accident levels may not be sufficient. Professional judgement will be needed to assess the implications of local circumstances, or factors which may elevate or lessen risks of accidents, eg. Junction conflicts. The assessor may find it valuable to refer to the Institution of Highways and Transportation publication on the safety auditing of highways.” ..... 10**

**Applying this IEMA Guidance means acknowledging that the Quarry will change the character of the B181 in the site vicinity due to the significant increase in HGV movements. Therefore, it is not sufficient to only consider historical accident records. Instead, according to the guidance, professional judgement should be used to assess local circumstance and factors that may elevate accident risk. These factors should include sub-standard junction geometries. .... 10**

**Not only does the A414 exit slip onto the B181 have an identified historic pattern of accidents but it also has sub-standard geometry. There is: ..... 11**

**Currently there are likely to be very few HGVs passing through this junction, and yet one HGV accident has been recorded. HGVs are more likely than other vehicles to be involved in accidents at this intersection because they will accelerate more slowly and are physically longer than cars and will therefore spend significantly longer than cars blocking oncoming B181 traffic. The expected significant increase in HGVs making this movement may therefore have significant impact on accidents at this intersection, irrespective of any existing accident pattern. .... 11**

**The Parish Council believes that the increase in HGV traffic associated with the Quarry will result in a significant and unacceptable increase in accident risk at the A414 exit slip with the B181. The Parish Council requests that an independent Safety Audit be undertaken on this junction, considering the expected impact of the Quarry. This would be in line with IEMA guidance. Subject to the conclusions of a safety audit, the Parish Council believes that suitable mitigation might include: ..... 11**

**It is worth noting that the draft text of the allocation does not refer directly to any existing accident record on the A414 slips or the B181 and does not acknowledge the potential change in character of this section of road due to the quarry operations. .... 11**

**There are five right turn accidents for vehicles turning into the A414 slip from the B181 Roydon direction in the past five years of which two were serious. .... 11**

**The Quarry will not change either traffic turning into the slip or traffic opposing this**

**turn. However, the proposed right turn into the Quarry is like this existing right turn into the A414 slip. It is possible that the slip turn accident pattern could be repeated at the Quarry access. Furthermore, in line with IEMA guidance, because of the significant change introduced by the fact that all nearly all turning traffic will be HGVs, which is likely to exacerbate accident risk, this new risk should be investigated, and potential mitigation put in place..... 11**

**It is worth noting that there is no street lighting at the slip road junctions or at the Quarry site access and this may be a contributory factor to existing accident risk. Existing accident data should be examined to see if dark or wet/overcast conditions are a factor. As with the A414 exit slip, the Parish Council requests that the Quarry access proposals be safety audited..... 11**

**Note that this review has been undertaken on the DTA TAA dated 18 January 2018 that was available from the HCC Minerals Local Plan Review Website. More recent work has been undertaken on behalf of Tarmac by DTA and a TAA dated April 2020 is referred to in by David L Walker Ltd in their report “Highways Access and Options Report” Dated May 2020. The main text of this report was provided to Stanstead Abbots Parish Council. The DTA report and a revised access arrangement plan are listed as appendices to this David L Walker report but unfortunately the appendices were not provided with the text. .... 11**

**HGV routing westwards ..... 12**

**The David L Walker Highways Access and Options Appraisal Report sets out a range for options for accessing westbound markets, whilst maintaining that these options are unnecessary as westbound markets won’t be pursued by Tarmac. The Parish Council, as with HCC, feels that such a future market cannot be ruled out and it would therefore be prudent to assess the impact of westbound HGVs..... 12**

**The Parish Council believes that, unless the access design physically prevents vehicles entering or leaving site from or to the west, HGVs will be strongly tempted to travel through the village because all alternatives will take significantly longer. The Parish Council therefore agrees with the HCC draft allocation requirement for an access design to prevent right turning out or left turning in HGVs at the Quarry access. However, this design solution also requires that the operator provides all drivers with adequate information about the left in ban from the west, including the access design preventing this turn. Otherwise, HGV drivers may still attempt to travel through the village to access the site..... 12**

**The Parish Council is very concerned with the HCC draft allocation emphasis on the re-opening of the west facing slip roads on the A414 with a suitable connection between the slip roads and the B181. The draft allocation states that: ..... 12**

**“This would require operational management of the slips to prevent non-site traffic, and suitable operational arrangements of the underpass under the A414 including consideration/mitigation of any impacts on bridleway Stansted Abbots 019”..... 12**

**The Parish Council does not wish to see westbound access to and from the A414 via the existing slips at Netherfield Lane as this would have significant detrimental impact on a valued local area including on the Netherfield Lane Bridleway and the RSPB nature reserve just south of the A414..... 12**

**It is difficult to see how the impacts on the bridleway and nature reserve can be managed or mitigated during construction and operation of the quarry. Note reports produced on behalf of Tarmac refer to a temporary operational closure, but given that the Quarry is expected to operate for around 20 years, this is actually a**

**permanent closure..... 12**

***For the option to reopen and use the west facing slips from the A414, the operational impact on the bridleway would be significant. The offslip traffic would cross the bridleway just north of the A414 and the onslip traffic would travel along the bridleway for a distance in excess of 50m including the 30m underpass. Assuming that 50% of traffic from the quarry uses the westbound slips, this would be around 100 inbound and 100 outbound HGV movements a day using each of the slips. This is around 10 per hour assuming a 10 hour operational day, or around 1 HGV roughly every 5-6 minutes. .... 12***

***Appendix F shows a photograph of the underpass and approach to it from the bridleway. The underpass has been measured at 5m in width and 5m in height. This width is too narrow to provide a footway adjacent to a vehicular route suitable for HGV traffic. The bridleway is used by significant numbers of cyclists. The width is also insufficient to provide a footway/cycleway and vehicle route. .... 13***

***The only way to manage the HGV quarry traffic and the bridleway would seem to be by controlling use of the route under the A414 to stop walkers and cyclists whilst HGV traffic is on it. Perhaps by use of traffic lights. However, it is difficult to see how this could be made to work and would require significant wait times for walkers to clear the route for example. .... 13***

***The bridleway would also need to be managed to control conflicts between crossing traffic coming off the A414 on the northern offslip and walkers and cyclists on the bridleway. .... 13***

***The Parish Council therefore strongly objects to the proposal to reopen the west facing slips because of its significant detrimental impact on the bridleway and nature reserve..... 13***

***The Parish Council also has significant concerns about how a route across the field from the slips would safely access the B181. An additional access with traffic turning right in or left out will only exacerbate the existing accident record on the B181 at the A414 accesses and will therefore increase accident risk. New accesses on the opposite side to the existing ones will also increase risk for vulnerable road users including pedestrians and cyclists who already use the B181..... 13***

***The draft allocation does not rule out other options for access to Quarry from the west. The Parish Council believes that none of the alternatives to the west facing slips presented in the David L Walker Highways Access and Options Appraisal Report are suitable. The report is difficult to understand as the appendices are not provided. The report conclusions don't seem to suggest any preferred solutions from the 8 presented. However, correspondence with Tarmac's agent (Included in Appendix F) states: ..... 13***

***“our preferred option remains Option D. However, should we need to facilitate materials heading west from the site our preferred option is to head east on the A414 and then effectively do a U-turn at an improved junction at Church Lane (Option H).” ..... 13***

***Option D is use of the existing road network including the A414 off and on-slips as they currently are and therefore no local provision for westbound movement of HGVs..... 13***

***Option H allows for changes (or as the text states “improvements” to the planned***



**Church Road/A414 signal junction (plans included in Appendix E) to allow a U turn to take place. .... 13**

**The Parish Council maintains that option D is unsatisfactory because proposed Church Lane signals and proposed signals to replace the Eastwick Road/Fifth Avenue Roundabout mean that there will be no future routes to allow westbound movement of HGVs at all..... 13**

**The David L Walker report does refer to a viable U-turn option H at Church Lane stating (Paragraph 8.4.2):..... 14**

**“[section 3 of the DTA TAA Report 2020] addresses the technical considerations raised by the Councils Highways experts regarding the Church Lane option and clearly demonstrates that a safe and sustainable means of using this junction to afford access to the westbound means of using this junction to afford access to the westbound carriageway, in the event that an eastbound site was not desirable.” .... 14**

**The Parish Council remains sceptical of this option. The plans and technical considerations showing this have not been provided to the Parish Council. Th most recent correspondence with Tarmac’s agent (Appendix F) states:..... 14**

**“There is currently still some work underway in terms of highways appraisals so we will not be in a position to share the full appendices until that work is complete”.... 14**

**This statement seriously undermines the David L Walker May 2020 Report which relies on the TAA April 2020 report in its conclusions of a safe and effective access to the Quarry. The appraisal work referred to would need to include modelling work to demonstrate the signals can operate both within capacity and safely with such a U Turn stage included..... 14**

**In conclusion, in the Parish Council:..... 14**

## **Neighbourhood Plan Development ..... 15**

### **Introduction ..... 15**

**The Draft Stanstead Abbotts and St Margaret’s Neighbourhood Plan allocates sites for a total of 94 new homes upto 2033. .... 15**

**Draft Neighbourhood Plan housing policy H3 ..... 15**

**Site Allocation Policy SASM H3 on land east of Netherfield Lane/South of Roydon Road is for a mixed use development including employment plus approximately 60 homes. This site is indicated on the plan in Appendix A. .... 15**

**There are concerns that this allocation will add traffic to the B181 Roydon Road in the vicinity of the B180 Hunsdon Road junction and Cat Hill. The B180 Hunsdon Road junction is perceived to be unsafe, particularly given the speed of B181 traffic and difficulties in exiting the B180 Hunsdon Road. This issue should be fully assessed as part of any Transport Assessment accompanying a future planning application for this site..... 15**

## **Conclusions..... 16**

**The Parish Council are concerned about the cumulative highways impacts on**

**Stanstead Abbots of the proposed Briggens Estate Quarry, Gilston Village 7 proposals for up to 1,500 new homes, and draft Stanstead Abbots and St Margaret's Neighbourhood Plan proposals including for 60 new dwellings off Netherfield Lane. .... 16**

**The key concerns of residents (as represented by the Parish Council) are:..... 16**

**The Gilston Village 7 assessment accompanying the outline planning application does not include Stanstead Abbots within its traffic impact assessment area. The Parish Council requests that the impact of vehicular traffic accessing rail stations, including St Margaret's, be considered. This should look at the potential for vehicular traffic and parking to impact upon Stanstead Abbots. .... 16**

**The Briggens Estate Quarry assessment suggests an additional 400 daily HGV movements on the B181 local to the proposed Quarry site and around 12 daily car movements. B181 traffic flow, speed and accident data are all critical to the determination of the suitability of any proposed Quarry access..... 16**

**The Tarmac documents presented to the Parish Council for review refer to out of date traffic flow and speed data and include out of date traffic accident data. The Parish Council requests that up-to-date traffic speed, flow and accident data be provided and suitably assessed as part of the HCC Minerals Local Plan Review. Such assessment is fundamental to deciding whether the Quarry site should be allocated for mineral extraction and should therefore not wait until a planning application before being properly presented. .... 16**

**The Parish Council believes that the increase in HGV traffic associated with the Quarry will result in a significant and unacceptable increase in accident risk at the A414 exit slip with the B181. The Parish Council requests that an independent Safety Audit be undertaken on this junction, considering the expected impact of the Quarry. This would be in line with IEMA guidance. Subject to the conclusions of a safety audit, the Parish Council believes that suitable mitigation might include:..... 16**

**The Parish Council believes that the Quarry access proposals may represent an unacceptable accident risk. According to IEMA Guidance, the safety of the proposals should be properly assessed to consider the significant change in character brought about by the proposed level of HGV traffic. The Parish Council would wish to see a full and independent safety audit of the proposed access, including an audit of the proposed design to prevent traffic heading to or from Stansted Abbots. .... 17**

**The Parish Council disputes the conclusions of the David L Walker report (May 2020) on the Quarry that states (paragraph 2.8):..... 17**

**"in principle, it has been established that this short stretch of the B181 is capable (in safety and capacity terms) to handle the amount of HGV traffic that the proposed scheme could generate." ..... 17**

**These conclusions rely heavily on a TAA Report (April 2020) that Tarmac's agent will not release to the Parish Council (See correspondence in Appendix G). .... 17**

**The Parish Council believes that none of the options for westbound access are suitable. These include the reopening of the westbound A414 slips as suggested in the HCC draft allocation document and the alternatives presented in the David L Walker Highways Access and Options Appraisal Report. The report includes Tarmac's preferred options D and H which are use of existing A414, with option H suggesting U turns may take place at the proposed Church Lane signals. .... 17**

***The Parish Council is concerned about potential increase in accident risk on the B181 Roydon Road due to the draft Neighbourhood Plan allocation H3 for upto 60 dwellings at Netherfield Lane. This risk should be fully assessed as part of any Transport Assessment accompanying a future planning application for this site..... 17***

## **Tables**

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# Introduction

## Scope of Project

AECOM was appointed by Locality to provide technical assistance to Stanstead Abbotts Neighbourhood Plan Group to undertake a Habitats Regulations Assessment (HRA) of the Stanstead Abbotts & St Margaret's (SASAM) Neighbourhood Plan (NP) 2022-2032. This is to inform the planning group and local council of the potential effects of Neighbourhood Plan (NP) development on European Sites (Special Areas of Conservation, SACs, Special Protection Areas, SPAs, and Ramsar sites designated under the Ramsar convention), and how they are being, or should be, addressed in the draft NP.

The SASMNP has been prepared to be in conformity with the current East Herts District Plan (October 2018) and sets out a range of policies for the Neighbourhood Area.

The plan contains policies on green spaces and the natural environment; on the community and leisure; on heritage and protection for historical features in the community; policies to encourage employment and others on transport addressing the needs of residents who have a variety of reasons to travel and importantly, housing allocations.

For the purpose of informing this NP HRA, policies contained within the East Herts District Plan and the most up to date District Plan HRA (AECOM, 2017) have been referred to. The District Plan HRA report including Appropriate Assessment was ultimately able to conclude no adverse effects on the integrity of European sites with changes to policy wording.

The objective of this HRA is to identify if any particular site allocation and/or policies proposed in the SASMNP have the potential to cause an adverse effect on the integrity of European designated sites, either in isolation or in combination with other plans and projects, and to determine whether site-specific or policy mitigation measures are required.

In May 2024, the Neighbourhood Plan Group provided amendments (the removal of three site allocations and removal of some development management policies, associated policy re-numbering) to the Neighbourhood Plan (March 2024 iteration) in order for AECOM to undertake an updated HRA. This report reflects these changes.

## Legislative Context

The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). This established a transition period, which ended on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law. During the transition period EU law applies to and in the UK. From 1 January 2021, the UK is no longer a member of the European Union. However, Habitats Regulations Assessment

will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019<sup>21</sup>.

The HRA process applies the 'Precautionary Principle'<sup>22</sup> to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Over-riding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

The need for Appropriate Assessment (**Box 1**) is set out in the Conservation of Habitats and Species Regulations 2017 (as amended).

### Box 1: The legislative basis for Appropriate Assessment

#### Conservation of Habitats and Species Regulations 2017 (As Amended)

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

It is *"A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority [the Local Planning Authority] may reasonably require for the purpose of the assessment under regulation 105... [which sets out the formal process for determination of 'likely significant effects' and the*

therefore important to note that this report has two purposes:

- To assist the Qualifying Body (Stanstead Abbots Parish Council) in preparing their plan by recommending (where necessary) any adjustments required to protect European sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
- On behalf of the Qualifying Body, to assist the Local Planning Authority (East Herts District Council) to discharge their duty under Regulation 105 (in their role as 'plan-making authority' within the meaning of that regulation) and Regulation 106 (in their role as 'competent authority').

**As 'competent authority', the legal responsibility for ensuring that a decision of 'likely significant effects' is made, for ensuring an 'appropriate assessment' (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.**

<sup>21</sup> these don't replace the 2017 Regulations but are just another set of amendments

<sup>22</sup> The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: *"When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis"*.

Over the years, 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of "Appropriate Assessment". Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

## Quality Assurance

This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2015 and 14001:2015, and ISO 44001:2017 and ISO 45001:2018. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.

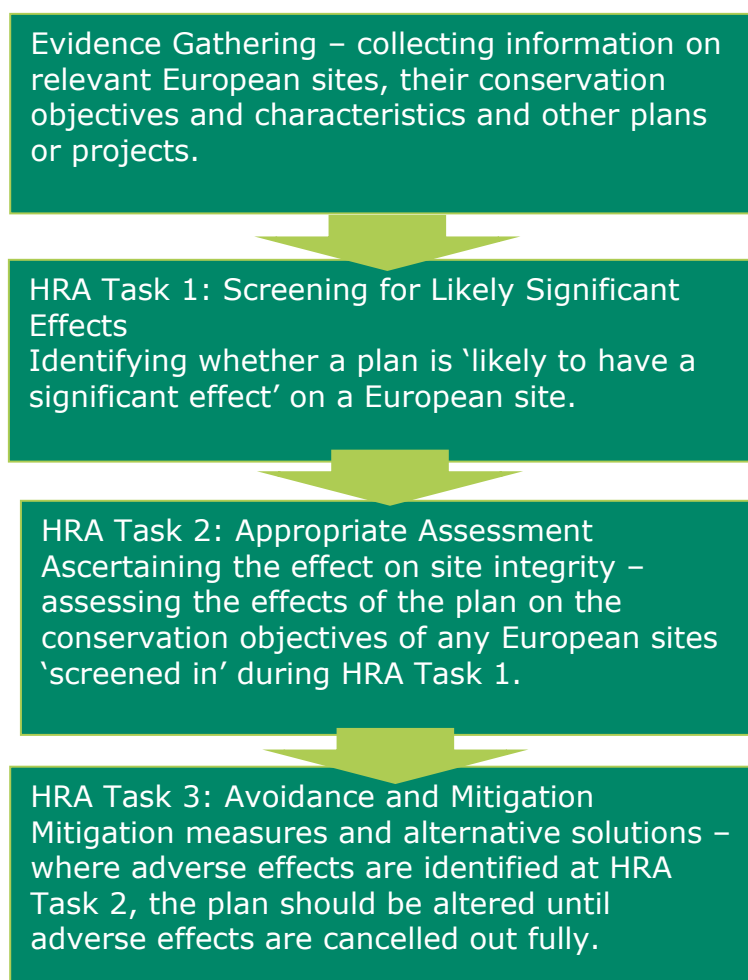
All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2017).

# Methodology

## Introduction to HRA Methodology

The HRA will be carried out with reference to the general EC guidance on HRA<sup>23</sup>; Natural England has produced its own internal guidance<sup>24</sup> as has the UK government<sup>25</sup>. These will be referred to in undertaking this HRA.

**Figure 1** below outlines the stages of HRA according to current guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.



**Figure 1. Four Stage Approach to Habitats Regulations Assessment (Department for Environment, Food & Rural Affairs, 2021)**

<sup>23</sup> European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

<sup>24</sup> [http://www.ukmpas.org/pdf/practical\\_guidance/HRGN1.pdf](http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf)

<sup>25</sup> [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site)

## Description of HRA Tasks

### HRA Task 1 – Test of Likely Significant Effects (ToLSE)

Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Test of Likely Significant Effects (ToLSE) test - essentially a brief, high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

- *“Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”*

The objective is to ‘screen out’ those plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction.

The ToLSE is based on identification of the Source of impact, the Pathway of that impact that exists to Receptors and then confirmation of the specific European Site receptors. These are normally designated features but also include habitats and species fundamental to those designated features achieving favourable conservation status (notably functionally linked land outside the European site boundary).

In the Waddenzee case<sup>26</sup>, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive, including that:

- An effect should be considered ‘likely’, *“if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site”* (para 44);
- An effect should be considered ‘significant’, *“if it undermines the conservation objectives”* (para 48); and
- Where a plan or project has an effect on a site *“but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned”* (para 47).

The ToLSE consists of two parts: firstly, determining whether there are any policies that could result in negative impact pathways and secondly determining whether there are any European sites that might be affected.

This ToLSE report identifies European designated sites that could be affected by the Plan and also those impact pathways that are most likely to require consideration.

It is important to note that the ToLSE must generally follow the precautionary principle as its main purpose is to determine whether the subsequent stage of ‘appropriate assessment’ (i.e., a more detailed investigation) is required.

### HRA Task 2 – Appropriate Assessment (AA)

Where it is determined that a conclusion of ‘no Likely Significant Effect’ cannot be drawn, the analysis must proceed to the next stage of HRA known as Appropriate Assessment. Case law has clarified that ‘Appropriate Assessment’ is not a

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<sup>26</sup> Case C-127/02



technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than ToLSE. Appropriate Assessment refers to whatever level of assessment is appropriate to form a conclusion regarding effects on the integrity (coherence of structure and function) of European sites in light of their conservation objectives.

By virtue of the fact that it follows the ToLSE process, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment would take any policies or allocations that could not be dismissed following the high-level Likely Significant Effects Test analysis and assess the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the European site(s)).

In 2018 the Holohan ruling<sup>27</sup> handed down by the European Court of Justice included among other provisions paragraph 39 of the ruling stating that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*' [emphasis added].

In evaluating significance, AECOM will rely on professional judgement as well as the results of bespoke studies, supported by appropriate evidence/data, and previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.

### HRA Task 3 - Mitigation

Where necessary, measures will be recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent, both nationally and locally, concerning the level of detail that a Plan document needs to contain regarding mitigation for recreational impacts on European sites, for example. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to the Plan being made, but the Plan must provide an adequate policy framework within which these measures can be delivered.

In evaluating significance, AECOM has relied on professional judgement and the DP HRA regarding development impacts on the European sites considered within this assessment.

When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves.

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<sup>27</sup> Case C-461/17

## Confirming Other Plans and Projects That May Act ‘In Combination’

It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question.

In considering the potential for combined regional housing development to impact on European sites the primary consideration is the impact of visitor numbers – i.e., recreational pressure and urbanisation.

When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e., to ensure that those projects or plans (which in themselves may have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in-combination assessment is therefore of greatest relevance when the plan or policy would otherwise be screened out because its individual contribution is inconsequential.

The following plans and projects (**Table 1**) are considered in-combination with the SASMNP:

**Table 1. Development proposed in neighbouring districts**

District authority	Development document	Proposed developments	Conclusions in HRA
Harlow Council	Local Development Plan	12,000 – 15,000 homes by 2031	HRA <sup>28</sup> (2018) concluded no adverse effect on the integrity of Wormley Hoddesdonpark Woods SAC, Lee Valley SPA or Lee Valley Ramsar site through any pathway of impact. In the light of the updated HMA air quality modelling released in January 2019 this HRA is also able to conclude no adverse effect on the integrity of Epping Forest SAC through the air quality pathway.
Hertsmere Borough Council	Local Plan 2012 – 2027	3,896 homes by 2027	Appropriate Assessment <sup>29</sup> (2016) concluded that the Hertsmere Local Plan is unlikely to have a significant effect on any European site, habitat or species
Welwyn Hatfield Borough Council	Local Plan	12,000 homes by 2032	Appropriate Assessment <sup>30</sup> concluded that the Local Plan would not have adverse effects on the integrity of Lee Valley SPA, either alone or in-combination, and additional recreational pressures, caused by the Plan, on any European sites are considered unlikely.

<sup>28</sup> AECOM 92018) Habitats Regulations Assessment of Harlow Local Development Plan Submitted Strategic and Development Management Policies 2018. Available online [www.harlow.gov.uk/planning-and-building-control/planning-policy/harlow-local-development-plan](http://www.harlow.gov.uk/planning-and-building-control/planning-policy/harlow-local-development-plan)

<sup>29</sup> Hertsmere Borough Council (2016) Sustainability Appraisal Scoping Report – Appropriate Assessment chapter. Available online at: <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/Scoping-Report-with-additional-SPDs.pdf>

<sup>30</sup> Land Use Consultants (2016) Welwyn and Hatfield Proposed Submission Local Plan 2016 Habitat Regulations Assessment, August 2016

District authority	Development document	Proposed developments	Conclusions in HRA
Enfield Council	Local Plan	34,500 homes by 2036	2014 HRA concluded that all likely significant effects alone or in-combination, on European sites, have been avoided.
East Herts District Council	District Plan	16,390 homes by 2033 (of which 94 have been assigned to Stanstead Abbots and St Margaret's)	The HRA <sup>31</sup> concluded that, should all new development deliver greenspace in line with NE's Accessible Natural Greenspace Standard (ANGSt), Lee Valley SPA remains adequately protected.
Epping Forest District Council	Local Plan	11,400 new homes by 2033	The HRA <sup>32</sup> of the Epping Forest Local Plan concluded that an adverse effect on integrity will not occur on any European site. This is based on the delivery of mitigation strategies (one for recreational pressure and an Air Pollution Mitigation Strategy for air quality) that will protect the SAC's conservation objectives from effects on integrity associated with air pollution and public access.
Broxbourne Borough Council	Local Plan	7,718 homes by 2033	The HRA <sup>33</sup> for the Broxbourne Local Plan concludes that, based on the Council's continued adoption and progress of the relevant monitoring and mitigation strategies, all potential LSEs on European sites caused by the Broxbourne Local Plan alone or in-combination can be objectively ruled out.

By 2036, these seven districts propose to have delivered at least 97,904 – 100,904 homes, of which 94 have been allocated to Stanstead Abbots.

The East Herts District Plan states *“The villages of .... Stanstead Abbots & St Margaret's .... will be encouraged to consider whether it is appropriate through the formulation of a Neighbourhood Plan to accommodate additional development especially where it contributes to wider sustainability objectives and the delivery of community benefits.”*

The 94 units proposed in the adopted East Herts District Plan were considered in combination with the remaining growth in and beyond East Herts as part of the District Plan HRA. However, in addition to the 94 units proposed in the East Herts District Plan, an additional 8 units are proposed in the SASMNP (refer to **Table**

<sup>31</sup> AECOM (2016) East Herts District Plan Habitats Regulations Assessment, September 2016 . Available online at: <http://democracy.eastherts.gov.uk/documents/s35911/Habitat%20Regulations%20Assessment%20%20ERP%20B%20HRA.pdf>

<sup>32</sup> AECOM (2021) Habitats Regulations Assessment of Epping Forest District Local Plan. Available online [https://www.efdclocalplan.org/wp-content/uploads/2021/07/EB211A-Epping-Forest-Local-Plan-HRA-June-2021-final-for-issue\\_Optimized-1.pdf](https://www.efdclocalplan.org/wp-content/uploads/2021/07/EB211A-Epping-Forest-Local-Plan-HRA-June-2021-final-for-issue_Optimized-1.pdf)

<sup>33</sup> LEPUS CONSULTING (2018) Habitat Regulations Assessment of the Broxbourne Local Plan HRA Appropriate Assessment Available online <https://www.broxbourne.gov.uk/downloads/file/913/ev1-habitats-regulations-assessment>

**5).** The focus of this HRA is therefore to determine whether these additional 8 units will materially change the conclusions of the District Plan HRA regarding growth at Stanstead Abbots & St Margaret's.

# European Sites

There are no standard criteria for determining the ultimate physical scope of an HRA. Rather, the source-pathway-receptor model should be used to determine whether there is any potential pathway connecting development to any European sites.

In the case of the SASMNP, an area extending to 15 km from the Parish boundary was selected in which European sites were identified. European sites where there is a pathway by which hydrological impact might occur were also included. A search radius of 15 km has been used for this analysis on the basis that any potential for pollution effects at greater distances is likely to be negligible due to dilution factors.

Epping Forest SAC has been considered as it is within 15 km of the Parish Boundary (c.10km south); however this European site has been scoped out due to the lack of hydrological connection, due to distance from the core 6.2km recreational catchment of the SAC as identified by visitor surveys (discussed in the Epping Forest District Local Plan HRA) and because an 'in combination' air quality modelling exercise undertaken for Epping Forest Local Plan HRA included an allowance for growth in East Herts and concluded that growth in that district (as well as Harlow and Uttlesford) would make a negligible contribution to traffic-related air quality impacts on the SAC. It is therefore reasonable to conclude that there are no impact pathways to this European site.

In the case of the SASMNP, it has been determined that the European sites identified in **Table 2** require consideration. The locations of these European sites in relation to the SASMNP boundary are illustrated in **Appendix A, Figure 1A**.

**Table 2. European sites for consideration and their location in relation to Stanstead Abbots & St Margaret's Parish boundary**

European site	Location and reason for inclusion
Lee Valley SPA/ Ramsar	<b>Partially within the boundary</b> Susceptible to recreational pressure, air quality reduction, water quality, changes in water levels and birds may potentially use habitat within Stanstead Abbots (supporting habitat).
Wormley-Hoddesdonpark Woods SAC	<b>1.6 km south-west</b> Susceptible to recreational pressure and air quality reduction.

Source: [www.magic.defra.gov.uk](http://www.magic.defra.gov.uk)

The reason for designation, conservation objectives and environmental vulnerabilities of the European sites are detailed below.

## Lee Valley SPA/ Ramsar

### Introduction

The Lee Valley SPA/ Ramsar comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24 km of the valley. These waterbodies support internationally important numbers of

wintering gadwall (*Anas strepera strepera*) and shoveler (*Anas clypeata*) and nationally important numbers of several other bird species.

The site also contains a range of wetland and valley bottom habitats, both man-made and semi-natural, which support a diverse range of wetland fauna and flora.

## Reasons for SPA Designation<sup>34</sup>

Qualifying Annex I species (in any season):

- Bittern (*Botaurus stellaris*)

Supports 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed on Annex I), in any season:

- Shoveler
- Gadwall

## Ramsar Qualifying Features<sup>35</sup>

The Lee Valley qualifies as a Ramsar site under the following Ramsar criteria:

- Criterion 2 - The site supports the nationally scarce plant species whorled water-milfoil (*Myriophyllum verticillatum*) and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).
- Criterion 6  
**Species with peak counts in spring/ autumn:** Shoveler  
**Species with peak counts in winter:** Gadwall

## Conservation Objectives<sup>36</sup>

*“With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the ‘Qualifying Features’ listed below), and subject to natural change;*

*Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;*

- *The extent and distribution of the habitats of the qualifying features*
- *The structure and function of the habitats of the qualifying features*
- *The supporting processes on which the habitats of the qualifying features rely*
- *The population of each of the qualifying features, and,*
- *The distribution of the qualifying features within the site.”*

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<sup>34</sup> [www.publications.naturalengland.org.uk/publication/5670650798669824](http://www.publications.naturalengland.org.uk/publication/5670650798669824)

<sup>35</sup> [www.jncc.gov.uk/jncc-assets/RIS/UK11034.pdf](http://www.jncc.gov.uk/jncc-assets/RIS/UK11034.pdf)

<sup>36</sup> [www.publications.naturalengland.org.uk/publication/5670650798669824](http://www.publications.naturalengland.org.uk/publication/5670650798669824)

## Current Pressures and Threats

The Site Improvement Plan<sup>37</sup> identifies the following pressures and threats to the SPA:

- Water pollution
- Hydrological changes
- Public access/ disturbance
- Inappropriate scrub control
- Fisheries: fish stocking
- Inappropriate cutting/ mowing
- Air pollution: risk of atmospheric nitrogen deposition

The Ramsar Information Sheet (RIS)<sup>38</sup> does not identify any factors (past, present or potential) adversely affecting the site's ecological character.

## Wormley-Hoddesdonpark Woods SAC

### Introduction

Wormley Hoddesdonpark Woods has large stands of almost pure hornbeam (*Carpinus betulus*) (former coppice), with sessile oak (*Quercus petraea*) standards. Areas dominated by bluebell (*Hyacinthoides non-scripta*) do occur, but elsewhere there are stands of great wood-rush (*Luzula sylvatica*) with carpets of the mosses *Dicranum majus* and *Leucobryum glaucum*. Locally, a bryophyte community more typical of continental Europe occurs, including the mosses *Dicranum montanum*, *D. flagellare* and *D. tauricum*.

### Reasons for Designation<sup>39</sup>

Qualifying Annex I habitat:

- Sub-Atlantic and medio-European oak or oak-hornbeam forests of the *Carpinion betuli*. (Oak-hornbeam forests)

### Conservation Objectives<sup>40</sup>

*“With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;*

*Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*

- *The extent and distribution of qualifying natural habitats*

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<sup>37</sup> [www.publications.naturalengland.org.uk/publication/5864999960444928](http://www.publications.naturalengland.org.uk/publication/5864999960444928)

<sup>38</sup> [www.jncc.gov.uk/jncc-assets/RIS/UK11034.pdf](http://www.jncc.gov.uk/jncc-assets/RIS/UK11034.pdf)

<sup>39</sup> [www.publications.naturalengland.org.uk/publication/4919819195383808](http://www.publications.naturalengland.org.uk/publication/4919819195383808)

<sup>40</sup> Ibid

- *The structure and function (including typical species) of qualifying natural habitats, and*
- *The supporting processes on which qualifying natural habitats rely”*

## **Current Pressures and Threats**

The Site Improvement Plan<sup>41</sup> identifies the following pressures and threats to the SAC:

- Disease
- Invasive species
- Air pollution: risk of atmospheric nitrogen deposition
- Deer
- Vehicles: illicit
- Forestry and woodland management
- Public access/ disturbance

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<sup>41</sup> [www.publications.naturalengland.org.uk/publication/6314181103976448](http://www.publications.naturalengland.org.uk/publication/6314181103976448)



# Test of Likely Significant Effects

## Background to Stanstead Abbots & St Margaret’s Parish

Stanstead Abbots & St Margaret’s is a village and civil parish in the district of East Hertfordshire. It lies on the county boundary with Essex, and is situated approximately 32 km north of London.

Once situated on the main A414, Stanstead Abbots & St Margaret’s has many old buildings in its High Street, although many have now made way for newer residential properties. The village is on the Hertford East Branch Line, with trains from St Margaret’s station to Liverpool Street Station. The main industry in the village used to be making malt but many of the original maltings have now been demolished to make way for a small business park.

## Impact Pathways

Based upon Natural England Site Improvement Plans and Conservation Objectives Supplementary Advice documents, there are several impact pathways that require consideration regarding increased development within the SASMNP area and the European sites identified in **Table 2**.

**Table 3** shows impact pathways considered further and those dismissed from further investigation with the justification.

**Table 3. European sites and potential impact pathways considered during Stage 1 Screening**

European site	Impact pathways considered	Impact pathways dismissed and justification
Lee Valley SPA/ Ramsar	<ul style="list-style-type: none"> <li>• Water pollution</li> <li>• Hydrological changes</li> <li>• Public access/ disturbance</li> <li>• Air pollution: risk of atmospheric nitrogen deposition</li> </ul>	<ul style="list-style-type: none"> <li>• Inappropriate scrub control – relates to the requirement for appropriate scrub control to maintain mosaic of habitats for SPA birds. Implementation of SASMNP will not influence management practices.</li> <li>• Fisheries: Fish stocking – this is to ensure that the fish population and species composition is appropriate to ensure suitable habitats including food resource and water quality are maintained for SPA bird species. Implementation of SASMNP will not influence fish stocking.</li> <li>• Invasive species – relates to <i>Azolla</i> and/or invasive aquatic blanket weeds will adversely affect aquatic habitat (food sources). Implementation of SASMNP will not influence invasive species.</li> <li>• Inappropriate cutting/ mowing – relates to the reedbed requiring rotational management for bittern. Implementation of SASMNP will not influence cutting/ mowing regimes.</li> </ul>

European site	Impact pathways considered	Impact pathways dismissed and justification
Wormley-Hoddesdonpark Woods SAC	<ul style="list-style-type: none"> <li>• Air pollution: risk of atmospheric nitrogen deposition</li> <li>• Vehicles: illicit</li> <li>• Public access/ disturbance</li> </ul>	<ul style="list-style-type: none"> <li>• Disease – relates to the spread of Acute Oak Decline (AOD). Implementation of SASMNP will not influence the spread of disease.</li> <li>• Invasive species – relates to the spread of non-native invasive tree and shrub species. Implementation of SASMNP will not influence the spread of invasive species.</li> <li>• Deer – relates to browsing and grazing by deer reducing tree regeneration (from seedlings or coppice stools) and damaging the woodland understorey and ground flora. Implementation of SASMNP will not influence the impact of deer.</li> <li>• Forestry and woodland management – Implementation of SASMNP will not influence forestry and woodland management practices.</li> </ul>

**Table 4** describes those impact pathways considered applicable further. The consideration of Neighbourhood Plan policies (the Test of Likely Significant Effects) is then documented in **Table 5**.

**Table 4. Description of potential impact pathways from implementation of the SASMNP on European sites**

Impact pathway	Discussion
<p>Hydrological changes (including changes in water quality)</p>	<p>Excessive changes to hydrology, such as through effects on water flow and volume, of European Sites are most likely to be the consequence of increased water abstraction for the public water supply and surface water run-off from impermeable urban surfaces.</p> <p>The East of England is generally an area of high-water stress. The most recent full CAMS assessment for the Upper Lee found that the Management Unit for Rivers Lee, Mimram, Beane, Ash, Rib and Upper Stort was over-abstacted. Rye Meads SSSI component of the Lee Valley SPA/Ramsar site is situated within East Herts and is particularly sensitive to high levels of freshwater abstraction (resulting in a reduction in water levels within the SPA).</p> <p>East Herts lies within the Affinity Water supply area, specifically their Central region, within Water Resource Zone (WRZ) 3 and 5. Approximately 60% of the Central region's water supply comes from groundwater sources (chalk and gravel aquifers) and 40% comes from surface water sources and imports from neighbouring water.</p> <p>The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:</p> <p>At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.</p> <ul style="list-style-type: none"> <li>• Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.</li> <li>• Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.</li> </ul> <p>Sewage and some industrial effluent discharges contribute to increased nutrients in the European sites and in particular to phosphate levels in watercourses.</p> <p>The HRA for the East Herts District Plan concluded that there would be no adverse effects on the <b>Lee Valley SPA/ Ramsar</b> as a result of changes in hydrology and water quality, however the SASM NP proposes an additional 8 residential units therefore this needs further consideration.</p>

## Impact pathway

## Discussion

Public access/ disturbance  
(including illicit vehicles)

Recreational use of an internationally designated site has potential to:

- Cause damage through mechanical/ abrasive damage and nutrient enrichment;
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl; and
- Prevent appropriate management or exacerbate existing management difficulties.

Different types of internationally designated sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

The Site Improvement Plan (SIP) for the **Lee Valley SPA** identifies that '*Areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly*'. It does not conclude that current recreational activity on the site is unsustainable; rather it identifies a project to first '*Investigate whether there is a need for change to access management*'. As such this site has the potential to be sensitive to any increases in recreational pressure stemming from new development.

The part of the SPA/Ramsar site that lies within the parish boundary is Rye Meads Nature Reserve, which is managed by the RSPB. The reserve is laid out in considerable detail with a network of ten hides and clearly marked footpaths/boardwalks with screening vegetation that are specifically laid out and designed to route people away from the sensitive areas and minimise disturbance while at the same time accommodating high numbers of visitors. Moreover, no dogs are allowed (except registered assistance dogs) and the wet and marshy/open water nature of the habitats on site inherently limits off-track recreational activity, rendering it difficult to accomplish and unappealing. For this reason, it is considered that the vulnerability of Rye Meads Nature Reserve to the potential adverse effects of recreational activity that can affect other less well-managed sites is very low.

Within the past ten years landowners/managers within the SPA (RSPB, the local Wildlife Trust, the Regional Park Authority and Thames Water) have undertaken initiatives both to facilitate and to promote greater public access to the SPA for recreation. Changing public access is fundamentally linked with increasing visitor numbers given that one of the primary reasons for changing the access is to attract more visitors. Thames Water's flagship Walthamstow Wetlands project, which opened in 2017, aims to substantially increase public access to, and use of, Walthamstow Reservoirs, which were currently little used for recreation and had only been accessible by prior arrangement. Clearly, the various owners and managers of the SPA components would not have embarked on these initiatives (or have been permitted to do it by competent authorities) if it was considered likely that by providing and promoting greater public access they would risk an adverse effect on the SPA.

This is consistent with the conclusion of the HRA of the adopted East Herts District Plan and with that of the recent Epping Forest District Local Plan.

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## Impact pathway

## Discussion

**Wormley-Hoddesdonpark Woods SAC** is located c.1.6km from the parish boundary. The SAC is a large, attractive area of ancient woodland with extensive public access and close to large urban centres. The majority of the woods in the complex are in sympathetic ownership, with no direct threat (Wormley-Hoddesdonpark Wood, for example, is managed by The Woodland Trust).

With regards to recreational pressures, the Site Improvement Plan for the SAC indicates that the site is heavily used by the public for recreational purposes. However, it also indicates that recreational activity is generally well-managed. Sensitive management of access points and routes by the site's main owners has been largely successful in mitigating the potential adverse effects of this high level of use. As such, general recreational pressure is not indicated in the Site Improvement Plan as a current or future obstacle to achieving or maintaining favourable conservation status and preserving the integrity of the SAC.

The site is split in to the 192.5ha Wormley Hoddesdonpark Woods South SSSI and the 143.9ha Wormley Hoddesdonpark Woods North SSSI. The qualifying features in both areas are predominantly in a favourable condition and no adverse effects have been recorded as a result of recreational pressures. Access points and routes into the site are closely managed.

Visitor survey data for the SAC is lacking. Data for other large woodland European sites offers some indication of the distance people would travel to visit the SAC. Surveys of Epping Forest<sup>42</sup> suggest visitors are likely to only travel up to 3km. Natural England's Monitor of Engagement with the Natural Environment (MENE) found that, in 2014/15, 89% of visitors to a woodland or forest travelled less than 5 miles, or 8km, to get there whilst approximately 70% travelled less than 3km<sup>43</sup>.

The qualifying features of the SAC are considered to be resilient to the effects of public access and are currently in a favourable condition. Implementation of the SASMNP is not anticipated to lead to a significant increase in visitors to the SAC. Furthermore, the SAC is closely managed to the extent that impacts of an increase in visitors would be limited.

Although within 3km of Stanstead Abbots & St Margaret's parish boundary, based on the issues identified in the Site Improvement Plan and the fact that concerns about recreational pressure on this site were not flagged by Natural England during the preparation of the East Herts District Plan and its HRA, there is no basis to conclude that public access/ disturbance (including illicit vehicles) would result in a likely significant effect on the SAC.

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<sup>42</sup> City of London (2014) Epping Forest Visitor Survey 2014 Results

<sup>43</sup> Natural England (2017) Monitor of Engagement with the Natural Environment (MENE) available online at: [www.naturalengland.tns-global.com/Default.aspx](http://www.naturalengland.tns-global.com/Default.aspx)

## Impact pathway

## Discussion

Air pollution: risk of atmospheric nitrogen deposition

It is considered that this pathway can be **screened out** both alone and in-combination, for both the SPA and SAC, which is consistent with the approach taken in the HRA of the adopted East Herts District Plan and of the recent Epping Forest District Local Plan.

Parts of the **Lee Valley SPA/ Ramsar** site are sensitive to deterioration in air quality, as the supporting habitat consists of terrestrial features that can be degraded by excessive deposition of pollutants. The Ramsar site is partly designated for its aquatic plant life, specifically the whorled water milfoil, which is dependent on calcareous water (and thus susceptible to acidification of the aquatic environment). All forms of development within the NP that would be likely to lead to increases in vehicle emissions within 200m of Lee Valley SPA and Ramsar could have potential to reduce air quality. Increased residential development would likely lead to a greater number of vehicles within the parish. As such, increased air pollution could arise relative to a situation of no growth. Pollutants released from vehicles may be carried directly by wind currents and deposited to European Sites or pollutants may become soluble and taken up during evaporation and deposited to said sites during precipitation. Guidance from the Institute of Air Quality Management and Highways England both set an impact zone of 200m from the roadside for potential significant air quality effects to vegetation from main road traffic.

As part of the Housing Market Area (HMA) assessment for the East Herts District Plan a detailed traffic modelling and air quality impact assessment was undertaken based on the provision of 16,390 new dwellings, coupled with other employment and infrastructure development. The results of this were used to inform the HRA of the District Plan.

The only portion of the SPA/ Ramsar site that is located within 200m of a major road is Rye Meads SSSI located within 200m of the A414, which is within the parish boundary. However, in their consultation responses on the East Herts District Plan and Epping Forest Local Plan Natural England confirmed that they were satisfied that the area of the Lee Valley SPA within 200m of the A414 (Rye Meads) was not susceptible to atmospheric pollution from road traffic. That site is therefore not discussed further with regard to air quality.

**Wormley-Hoddesdonpark Woods SAC** lies within 200m of the A10 at grid reference 535600,208750. However, this applies to a very small part of the site (approximately 500m<sup>2</sup>) much of which is a track/path/arable field boundary and which constitutes approximately 0.01% of the SAC. More-over it is situated on the edge of the 200m zone, being no closer to the A10 than 190m at any point. As such, it is considered that increases in traffic movements on the A10 could not lead to a likely significant effect on the interest features of this SAC through changes in local air quality, due to the very small area of the SAC potentially affected and the very small extent to which it is likely to be affected given it is 190m from the road. Air quality on this site is not considered further. This conclusion was drawn in the HRA of the adopted East Herts Local Plan and the recent Epping Forest District Local Plan and was accepted by Natural England.

**Table 5. Screening assessment (Test of Likely Significant Effects) of the SASMNP**

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
<b>Housing</b>			
SASM H1 Village and Green Belt Boundary	N/A	Policy refers to the amended green belt boundary and specifies when development within the green belt boundary will be permitted.	<p><b>No Likely Significant Effect. Screened out.</b></p> <p>This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.</p>
SASM H2 Housing Numbers	Lee Valley SPA/ Ramsar	<p>Policy specifies two sites for housing development and housing numbers. These are:</p> <p>SASM H3 Land east of Netherfield Lane/ South of Roydon Road (60 dwellings)</p> <p>SASM H4: Site H6, two garage sites on Abbots Way for approximately 7 homes (sites 32 and 33). 25 homes which have been built out since April 2017 (Sites 28,29,30a, 30b, 36,37 and 38)</p> <p>Windfall sites (6 dwellings). i.e. 98 dwellings in total</p>	<p><b>Likely Significant Effect. Screened in.</b></p> <p>This policy identifies sites for development and specifies housing numbers.</p> <p>Potential to cause changes in water levels due to increase in demand for water abstraction and changes in water quality.</p>
SASM H3 Land East of Netherfield Lane/south of Roydon Road	Lee Valley SPA/ Ramsar	This is a site allocation policy specifying 60 residential units within a mixed-use development.	<p><b>Likely Significant Effect. Screened in.</b></p> <p>This policy identifies a site for development and specifies housing numbers.</p> <p>Potential to cause changes in water levels due to increase in demand for water abstraction and water quality.</p>
SASM H4: Site H6 Chapelfields and Abbots Way Garages	Lee Valley SPA/ Ramsar	This is a site allocation policy. Housing numbers (up to 7 units) are specified under policy SASM H2	<p><b>Likely Significant Effect. Screened in.</b></p> <p>This policy identifies a site for development</p>

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
SASM H5: Brownfield Land and Windfall sites	N/A	Policy offers support for the development of small infill sites within the existing built-up area.	Potential to cause changes in water levels due to increase in demand for water abstraction and water quality. <b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development, however any identified will be within the existing built-up area. Therefore, no impact pathways exist to European Sites.
SASM H6: Type and Mix of Housing	N/A	Policy describes the requirement for a range of housing types, sizes and tenures.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
<b>Design</b>			
SASM D1 Design of Development	N/A	Policy describes the design requirements for new developments.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
SASM D2 Housing Density	N/A	Policy describes how the density of new development needs to be appropriate to its location.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
SASM D3 Amenity	N/A	Policy describes the need for new housing developments to provide good standards of daylight and sunlight.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for



Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
			development. Therefore, no impact pathways exist to European sites.
SASM D4 Residential Amenity Space	N/A	Policy describes the need for new housing developments to provide adequate recreational space.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
<b>Riverside</b>			
SASM R1 Riverside Development	N/A	Policy describes criteria for acceptable riverside development	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
SASM R2 Floating Structures	N/A	Policy describes criteria for acceptable structures	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
<b>Heritage Assets</b>			
SASM HA1: Heritage Assets	N/A	Policy aims to prevent new developments from having a negative impact on the local character of heritage assets.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
SASM HA2: Non-designated Heritage Assets	N/A	Policy identifies structures where local distinctiveness must be taken into account.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
SASM HA3: Archaeology	N/A	Policy identifies specific archaeological areas which must be taken into account. Proposals that may cause a direct impact must provide a pre-development desk-based assessment of potential impact.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
SASM HA4: Protected Views	N/A	Policy identifies important local views and states that development proposals which negatively impact these views will not be supported.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
<b>Natural Environment</b>			
SASM NE1 Local Green Space (LGS)	N/A	Policy identifies areas of Local Green Space and aims to protect these areas.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
SASM NE2 Nature Conservation	N/A	Policy describes how biodiversity net gain is expected to be demonstrated as part of any new development. Biodiversity net gain should be calculated using the Defra Biodiversity Metric.	<b>No Likely Significant Effect. Screened out.</b> Policy has specific wording relating to the protection of habitats and species of international/ national importance against development. No impact pathways exist to European sites.
SASM NE3 Valued Hedgerows and Trees	N/A	Policy describes the need to protect and retain trees and hedgerows and sets a requirement for development to replace any trees removed.	<b>No Likely Significant Effect. Screened out.</b> This policy is designed to protect and enhance the natural environment. This policy is considered to have no adverse impacts on European sites.
SASM NE4 Environmental Impact of Flooding	N/A	Policy recognises the need for an effective flood risk management to be demonstrated as part of major development proposals.	<b>No Likely Significant Effect. Screened out.</b> Policy sets out the approach to managing flood risk and surface water and commits developments to demonstrating that they will

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
			not exacerbate flood risk. This policy is considered to have no adverse impacts on European sites.
<b>Leisure and Community Facilities</b>			
SASM CL1 Existing Community Facilities	N/A	Policy supports the extension or relocation of existing community facilities.	<b>No Likely Significant Effect. Screened out.</b> This is a statement of intent and identifies facilities for renewal/improvement. Therefore, no impact pathways exist to European Sites.
SASM CL2 New Leisure Facilities	N/A	New facilities will be supported provided that they demonstrate inclusive design and are in a suitable location.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
SASM CL3 New Facilities	N/A	The need for facilities such as allotments, tourist accommodation and new cultural facilities in the village has been identified and provision of these facilities will be supported provided they are in keeping with policies elsewhere in the Neighbourhood Plan.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European sites.
<b>Business and Employment</b>			
SASM B1 Local Employment Areas	N/A	Policy supports the conversion or redevelopment of existing employment areas where they enhance the employment offer	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate additional sites for development. Therefore, no impact pathways exist to European sites.
SASM B2 The High Street	N/A	Policy aims to strengthen the High Street area to meet changing retail requirements.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate additional sites for development. Therefore, no impact pathways exist to European sites

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
SASM B3 Flexible Working	N/A	Policy specifies a requirement for all new residential and employment development to be designed to connect to high quality communications infrastructure.	<b>No Likely Significant Effect. Screened out.</b> This is a statement of intent and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
SASM B4 Farm Diversification and Tourism Related Business	N/A	Diversification and tourism-based development will be supported in principle, subject to specified criteria, support for Lee Valley Park development framework and subject to other policies within the plan.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate additional sites for development. Therefore, no impact pathways exist to European sites.
<b>Transport</b>			
SASM TR1 Safe and Sustainable Transport	N/A	Policy seeks to promote sustainable transport by supporting development where amenities are easily accessible by pedestrians and cyclists	<b>No Likely Significant Effect. Screened out.</b> This policy relates to supporting developments which encourage the use of modes of sustainable transport and as such implementation of this policy is unlikely to have adverse impacts on European sites.
SASM TR2 Traffic Impact of Major Development	N/A	Policy states that major development proposals should not generate an unacceptable increase in traffic volume and movements within or through the village. A Traffic Impact Assessment proportional to the scale of the proposed development will be required.	<b>No Likely Significant Effect. Screened out.</b> This is a development management policy and does not specifically allocate additional sites for development. Therefore, no impact pathways exist to European sites.
SASM TR3 Parking Standards	N/A	Policy aims to ensure adequate parking provision is made.	<b>No Likely Significant Effect. Screened out.</b> Policy aspires to maximise parking provision within the village. No impact pathways exist to European Sites
<b>Implementation</b>			

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
SASM IM1 Spending Priorities	N/A	Policy describes how any FINDING generated through development should be used to improve infrastructure and facilities within the area.	<p><b>No Likely Significant Effect. Screened out.</b></p> <p>This details how improvements to infrastructure and facilities will be funded, therefore, no impact pathways exist to European Sites.</p>

Source: SASM Neighbourhood Plan Policies

# Appropriate Assessment

The law does not prescribe how an appropriate assessment should be undertaken or presented but the appropriate assessment must consider all impact pathways that have been screened in, whether they are due to policies alone or to impact pathways that arise in combination with other projects and plans. That analysis is the purpose of this section. The law does not require the 'alone' and 'in combination' effects to be examined separately provided all effects are discussed.

By virtue of the small amount of growth the NP specifies for Stanstead Abbots, the main impact pathways of concern to this HRA i.e., hydrological changes and changes in water quality are inherently 'in combination' with neighbouring plans and projects.

The HRA screening exercise undertaken in **Table 5** indicates that three NP Policies were considered to pose Likely Significant Effects for European sites alone (and will therefore also do so 'in combination' with other projects and plans) as a result of a slight increase in the number of residential units and require further assessment in terms of changes in hydrology due to abstraction for public water supply and changes in water quality due to the potential for an increase in sewage discharge:

- Policy SASM H2: Housing Numbers
- Policy SASM H3: Land East of Netherfield Lane/south of Roydon Road (584m north-east of Lee Valley SPA/ Ramsar)
- Policy SASM H4: Site H6 Chapelfields and Abbots Way Garages (551m south-east of Lee Valley SPA/ Ramsar)

All of these policies identify sites allocated for development and/ or specify housing numbers.

In previous iteration so the Neighbourhood Plan, the quantum of housing to be delivered within the NP was more than that provided for the Parish by the overarching District Plan. However, within the March 2024 updated Neighbourhood Plan the quantum of housing to be delivered by the NP has been amended to be in line with the quantum specified with in the District Plan and thus assessed in the District Plan HRA before it was adopted.



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# Changes in Hydrology and Water Quality

## Water abstraction

The Lee Valley SPA/Ramsar site consists of four Sites of Special Scientific Interest, of which Turnford and Cheshunt Pits SSSI, Rye Meads SSSI and Amwell Quarry SSSI all lie on the Hertfordshire/Essex border. Walthamstow Reservoirs SSSI lies within London Borough of Waltham Forest. Walthamstow Reservoirs is a sealed storage reservoir and part of the public water supply infrastructure for London. Rye Meads is unlikely to ever suffer from a shortage in water quantity due to its close relationship with Rye Meads Wastewater Treatment Works. The nearest proposed housing allocation to a relevant part of the SPA (Amwell Quarry) is 250m away and separated by the River Lee Navigation, so direct water resource effects from specific development sites will not arise. However, the quarries could theoretically be adversely affected if groundwater abstraction for public water supply was sufficiently great to cause drawdown of water levels.

Public water supply for East Herts is handled by Affinity Water. It lies within the Central region, crossing the Lee and Stort Water Resource Zones. The Affinity Water Central region abstracts 60% of its water supply from groundwater sources with boreholes abstracting from chalk and gravel aquifers. The latest draft Affinity Water Water Resource Management Plan (WRMP24) covers the period up to 2075 and states that an HRA of the WRMP has been undertaken and that they have been able to demonstrate sufficient alternative supply options to ensure that adverse effects on European sites can be avoided. As such, it can be concluded that delivery of the SASMNP will not result in adverse effects on Lee Valley SPA/Ramsar site through excessive water drawdown, either alone or in combination with other plans and projects.

## Water quality

Change in water quality is the main pathway through which the Lee Valley SPA/Ramsar site could be adversely affected. Two parts of the Lee Valley SPA/Ramsar site lie within East Herts: Amwell Quarry and Rye Meads. The nearest proposed development site to a part of Lee Valley SPA/Ramsar site is 250m distant and separated by the River Lee Navigation, so direct surface water runoff effects on water quality will not arise. However, Rye Meads consists of non-operational land at and around the Rye Meads Wastewater Treatment Works (WwTW). Parts of the SPA consist of open water but other parts consist of fen or marsh vegetation that would theoretically be susceptible to nutrient enrichment from treated wastewater.



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'Poor fens' (i.e., acidic fens) are strongly nitrogen limited. In other words, nitrogen availability is the factor which ultimately controls vegetation response to other nutrients and a small change in nitrogen inputs can result in a major change in the vegetation composition. In contrast, other types of fen with a relatively alkaline pH (called 'rich' fens) such as those at Rye Meads are phosphorus-limited, meaning that phosphorus availability is the factor which ultimately controls vegetation response to other nutrients. This also applies to fluvial flood-plain grasslands like those at Rye Meads SSSI. In a phosphorus limited system, high nitrogen availability will not result in a deleterious effect on vegetation provided that phosphorus availability is controlled<sup>44</sup>. That is not to say that nitrogen inputs would therefore be irrelevant, but it does mean that when nitrogen is already in excess (and phosphorus inputs can be controlled) a proportionate response must be made to the risk posed by small additional nitrogen inputs. Effluent discharges from Rye Meads Sewage Treatment Works (STW) into Tollhouse Stream. The stream flows through the SSSI and has been known to back up into the marsh grassland parts of the SSSI during periods of high flow.

The current discharge consent for Rye Meads WwTW has been subjected to a review by the Environment Agency and Thames Water (Review of Consents) specifically for the purpose of determining whether the current consented phosphorus limits on the discharge are leading to an adverse effect on the Lee Valley SPA/Ramsar site, and if so, to amend the consent in order to avoid such an effect. As such, provided effluent from new development within the Rye Meads catchment can be accommodated within the existing volumetric discharge consent for the WwTW it can be concluded with confidence that an adverse effect on the SPA/Ramsar site is unlikely to occur from this pathway.

However, once the WwTW ceases to have capacity within its existing discharge consent for effluent from additional dwellings, it will be necessary for Thames Water to apply to the Environment Agency to increase the consented discharge volume, or direct flows to an alternative treatment facility. The Environment Agency is very unlikely to consent to an increase in discharge volume from the WwTW unless the phosphate concentration within the effluent can be further tightened to ensure no deterioration in water quality in Tollhouse Stream. There is a technical limit (known as the limit of Best Available Technology) to how much phosphorus removal a WwTW can incorporate. If this situation arises, there is a risk that future dwellings within the catchment could not be accommodated at Rye

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<sup>44</sup> 'In a nutrient limited system, excess of the non-limiting nutrient may not result in any signs of enrichment in the vegetation as the plants are unable to make use of one nutrient without sufficient amounts of the other'.

Source: Understanding Fen Nutrients <http://www.snh.gov.uk/docs/A416930.pdf>





Meads WwTW, requiring an alternative treatment solution that does not as yet exist. Water quality is therefore an important pathway to investigate with regard to future development within the Rye Meads WwTW catchment.

The Harlow WCS<sup>45</sup> undertook a headroom assessment of Rye Meads WwTW in relation to committed and planned future growth scenarios with Harlow and six neighbouring authorities (East Herefordshire, North Hertfordshire, Stevenage, Welwyn Hatfield, Epping Forest and Broxbourne). The catchment of Rye Meads WwTW is expected to accommodate growth within Harlow as well as a large portion of development within the neighbouring six authorities. The WCS states: *the 'headroom assessment undertaken by JBA ... indicates that Rye Meads has capacity to accommodate growth within Harlow and surrounding authorities over the plan period, within the current permitted DWF discharge of 110 ML/d.*

Additionally, Rye Meads WwTW is undergoing an upgrade in treatment capacity and to improve discharge quality standards (up to 447,134 Population Equivalent)<sup>46</sup>. Thames Water confirmed over the Harlow Local Plan that Rye Mead WwTW will have sufficient headroom capacity until 2036 and thus be able to cover the Neighbourhood Plan period (which runs to 2033). As such, since effluent from new development within the Rye Meads catchment can be accommodated within the existing volumetric discharge consent for the WwTW it can be concluded with confidence that an adverse effect on the SPA and Ramsar site is unlikely to occur from this pathway alone or in combination with other plans and projects.

However, it will be necessary to ensure that development within the catchment of Rye Meads WwTW to keep pace with the provision of wastewater treatment infrastructure and environmental capacity there. Using less water per person will reduce the impact of new development on the hydraulic capacity at Rye Meads WwTW, allowing more development to be catered for within the existing capacity and delay the need for a larger volumetric discharge consent. As a result, Policy WAT6 of the East Herts District Plan was revised to require development within the catchment of Rye Meads WwTW to keep pace with the provision of wastewater treatment infrastructure and environmental capacity there. In particular, the policy clarifies that development within the catchment cannot be occupied until such time as greater environmental capacity is delivered or confirmed at Rye Meads, or an alternative solution devised.

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<sup>45</sup> JBA Consulting (September 2018) Harlow Gilston Garden Town Water Cycle Study update (Final Report)

<sup>46</sup> Thames Water October 2018 Position Statement On Development In The Greater Harlow Area



The previous iteration of the Neighbourhood Plan was noted to add a further eight dwellings beyond those taken into consideration when the East Herts District Plan HRA assessment (and HRAs for adjacent authorities such as Harlow and Epping Forest District) were undertaken, this is a negligible change within the context of the large number of existing and future dwellings served by Rye Meads WwTW and will therefore make a negligible contribution to pressure on the WwTW. Moreover, the policy context described above (requiring development in the Rye Meads catchment to keep pace with available infrastructure) will ultimately protect the European site.

However, since this time, the Neighbourhood Plan has been updated (March 2024 iteration), to reduce the quantum of housing to be delivered by the NP to bring it in line with the quantum of development provided by the overarching District Plan. As no additional net development will be provided beyond that which is provided by the overarching District Plan (which has been subject to HRA prior to adoption), and with this over-arching District Plan policy in place, it is therefore possible to conclude that the SASM Neighbourhood Plan will not result in a water quality effect on Lee Valley SPA/Ramsar site either alone or in combination with other projects and plans.

## Conclusions

This assessment undertook both Screening and Appropriate Assessment of the policies and the proposed allocations within the SASMNP.

The European site considered within the Appropriate Assessment for impact pathways that could not be screened out at the screening stage was:

- Lee Valley SPA/Ramsar

Impact pathways considered during the screening were: hydrological changes, including changes in water quality; public access/ disturbance (including use of illicit vehicles) and air pollution - risk of atmospheric nitrogen deposition. Of these the following was taken through to Appropriate Assessment: hydrological changes, including changes in water quality.

Three policies were subject to Appropriate Assessment as they allocated development sites and specified housing numbers and were located within the accepted zones of influence of the aforementioned international sites and could result in adverse effects on the integrity of an international site both alone and in combination with other projects and plans.



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Following Appropriate Assessment, it is concluded that, with the implementation of East Herts District Plan Policy WAT6, the Stanstead Abbots Neighbourhood Plan would contain sufficient policy framework to ensure no adverse effects on the integrity of European sites will occur in isolation or in combination with other projects and plans.



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# Figures

Figure 1 – European sites

NB Insert PDF map direct



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**Appendix 24**

**Stanstead Abbots,  
East Herts District Council**

**Transport Statement  
September 2022**

**Stanstead Abbots Parish Council**



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# Introduction

This Transport Statement has been prepared by Fieldgate Consultants on behalf of Stanstead Abbots Parish Council. The Parish Council are concerned about the cumulative highways impacts on Stanstead Abbots of proposed development including:

- the proposed Briggens Estate Quarry;
- Gilston Garden Village proposals including Gilston Village 7; and
- St Margarets and Stanstead Abbots Draft Neighbourhood Plan sites.

This Statement is a revised version of a Statement originally prepared in November 2020. This revision retains information on the last Tarmac submission regarding the quarry, but updates traffic accident data and responds to the latest Hertfordshire County Council draft allocation for Briggens Quarry.

A location plan showing the areas of the proposed Quarry, Gilston Village 7, and development on Netherfield Lane (as part of the draft Neighbourhood Plan allocations) is shown in **Appendix A**.

The proposed Briggens Estate quarry site has received a draft allocation MAS01 in the Minerals and Waste Plan for Hertfordshire County Council (HCC) and the site is being promoted by Tarmac. Gilston Village 7 is currently the subject of an outline planning application. The Draft Neighbourhood Local Plan allocations are currently under review.

This Transport Statement has been prepared according to the latest planning practice guidance on Travel Plans, Transport Assessment and Statements (Ministry of Housing Communities and Local Government March 2014). Reference is also made to Institute of Environmental Assessment Guidance Note 1 on The Environmental Assessment of Road Traffic.

The contents of this Transport Statement are:

- Section 2 describes the various site locations, Stanstead Abbots Parish Council highways concerns and baseline traffic conditions;
- Section 3 briefly describes the Gilston Village 7 proposals and likely impact upon Stanstead Abbots;
- Section 4 reviews the proposed Quarry and its expected impacts as set out in various documents promoting the Quarry allocation;
- Section 5 briefly describes Neighbourhood Plan proposals; and
- Section 6 sets out conclusions.





# Baseline Traffic Conditions

## Introduction

This section considers the existing traffic issues in and around Stanstead Abbots including the concerns of the Parish Council.

## Stanstead Abbots

Stanstead Abbots village boundary as described in the Draft Stanstead Abbots and St Margaret's Neighbourhood Plan is shown on the plan in **Appendix A**.

The village can be accessed from the wider area by four main routes:

- Hollycross Lane/Cappell Lane from Ware from the north;
- The B180 Hunsdon Road from the east;
- The B181 Roydon Road from the south;
- Hoddesdon Road from the south-west; and
- B181 High Street from the west.

The village centre lies on B1812 High Street and includes a range of local shops, facilities and businesses. Stanstead St Margarets rail station lies towards the western High Street end and there is a level crossing across the High Street just by the station. There is a 30mph speed limit through the village and a weight limit banning lorries above 7.5 tonnes in the village except for access. The lorry ban sign locations are on each approach road as shown on the plan in **Appendix A**.

## Parish council highways concerns

The key concerns of residents (as represented by the Parish Council) are:

- Non-observance of the lorry ban – with lorries regularly travelling through the village ignoring the signed ban;
- Speeding on Cappell Lane on the northern approach to the village to and from Ware;
- Speeding on Cat Hill, the B181 Roydon Road approach to Stanstead Abbots by the B180 Hunsdon Road;
- The impact of the proposed Quarry on the B181 approach to Stanstead Abbots village and impacts within the village due to non-observance of the existing lorry ban;
- The impact on the town of additional traffic from Gilston Village 7, including the possibility of significant increase in traffic using St Margaret's Station; and
- The cumulative traffic impacts on Stanstead Abbots due to the Quarry, Gilston Village 7 and Neighbourhood plan development.

## The B181 Roydon Road

The B181 Roydon Road provides access to Stanstead Abbots from the south and links the village with Roydon which lies approximately 2km south of Stanstead Abbots.



The A414 dual carriageway is crossed by the B181 via a bridge roughly halfway between the two villages. There are east facing slips to and from the A414 either side of the bridge but no west facing slips. The Quarry site lies just north of the A414 bridge and south of Stanstead Abbots village as shown on the plan in **Appendix A**. The speed limit on the B181 changes from 30mph to the national speed limit (60mph) heading away from Stanstead Abbots part way along the Quarry site boundary.

The B181 is unlit between Stanstead Abbots and Roysdon.

The initial section of the B181 heading south from Stanstead Abbots from the B180 Hunsdon Road junction is known as Cat Hill and climbs steadily for about 300m southwards. Residents observe that traffic frequently speeds along this section which has a 30mph speed limit.

Department for Transport traffic flow data for this section of the B181 is included in **Appendix B**. This data shows that in 2009, Annual Average Daily (AADT) traffic was recorded as 4,910 vehicles of which 27 (or 0.5%) were HGVs. This low number of HGV probably reflects the lorry ban on this section of the B181 for all HGVs except those accessing the village.

At the A414 eastbound entry slip from the B181, there is a forward visibility for vehicles turning right into the slip of about 180m along the B181 kerb as shown on the plan in **Appendix C**. The visibility at the A414 exit slip road for vehicles turning out is poor, particularly for right turning traffic, being about 35m to the right and about 100m to the left at 2.4m back from the give way line, and about 30m and 90m respectively at 4.5m back from the give-way line (as required by Design Manual for Roads and Bridges (DMRB) document CD 123 on design of priority junctions).

Based on a speed limit of 60mph, a sight stopping distance should be provided of 215m (as set out in DMRB document CD109 on highway link design) and the visibilities at the exit and entry slips therefore do not achieve the necessary sight stopping distances for the speed limit.

The latest five-year accident data was provided by HCC, to June 2020, and is included in **Appendix D**. This anonymised data is basic and does not include details of accidents. However, some of the data was cross referenced with Crash Map and also data from the David Tucker Associates (DTA) Transport and Access Appraisal (TAA) for Tarmac (January 2018). The data showed that in the five years to June 2020 there were:

- 5 injury accidents on the A414 exit slip junction with the B181 of which 4 were right turn accidents, 1 involving an HGV and 1 was serious;
- 5 injury accidents on the A414 entry slip junction with the B181 of which all 5 were right turn accidents and 1 was serious.

Crash Map has been used to update this accident information to the latest 5 years of data to June 2021. During the period from 2017 to 2021 there were:

- 4 injury accidents on the A414 exit slip junction with the B181 of which at least 3 were right turn accidents and 1 was serious;



5 injury accidents on the A414 entry slip junction with the B181 of which all 5 were right turn accidents and 2 were serious; and  
1 serious injury accident on the B181 adjacent to the proposed quarry site and close to the proposed access, involving a vehicle and pedal cyclist.

There is clearly a pattern of accidents at the two slip road junctions of right turn accidents that, particularly in the case of the exit slip, might be linked to the poor visibility when exiting the slip road.

It is worth noting that:

The exit slip had one accident involving an HGV (or 20% of recorded accidents) even though HGV movements were only 27 per day or 0.5% of all traffic on the B181; and  
Most of accidents (at least 8 of 9) at the junction comprising the two slip roads were right turn accidents.



# Gilston Village 7

## Introduction

This section outlines the proposals for Gilston Garden Town and Gilston Village 7 and its potential impact on Stanstead Abbots.

## Harlow and Gilston Garden Town

The proposals for Gilston Villages and the proposals for Harlow are set out in a range of documents including various planning applications for Gilston Villages and the Harlow Development Plan. Together, these changes can be encapsulated as the Harlow and Gilston Garden Town (known as "The Garden Town"). The proposals are for up to 10,000 new homes and are being planned jointly by Harlow District Council, East Hertfordshire District Council, Epping Forest District Council, Hertfordshire County Council and Essex County Council. The infrastructure required to deliver the Garden Town is set out in the Harlow and Gilston Garden Town Infrastructure Delivery Plan (HGGT IGP; April 2019).

The HGGT includes significant changes to the A414 corridor between Stanstead Abbots and Harlow including:

- Improvements for a "Western access" to Gilston (Village 7) including signalisation of the Church Lane junction of the A414; and
- Improvements for the "Central access" to Gilston (Village 1) including signalisation of the Eastwick Road/Fifth Avenue roundabout access to Harlow along with bus and cycle lanes and other improvements.

The detail of these proposals can be found in section 3.5.3 of the HGGT IGP (pages 16 and 17) on Stortford River Crossings. The text states:

*"The existing Fifth Avenue crossing, between the Eastwick roundabout in EastHertfordshire and Burnt Mill roundabout in Harlow, has been identified for enhancement in the adopted East Herts District Plan (Policy GA2) and the Harlow Local Development Plan (Pre-Submission Publication) (Policy SIR1). The identified enhancement comprises dualling of the northbound and southbound carriageways and provision of a new footway/cycleway, which will form part of a north-south sustainable transport corridor through Harlow.*

*The dualling is for the purposes of providing dedicated public transport lanes, which together with the new footway/cycleway will form an extension of the planned Sustainable Transport Corridors. The existing highway capacity will remain broadly as presently provided. The works also include reconfiguration of the existing Eastwick roundabout to a signalised junction; in this regard, these works overlap with works to deliver the new Eastern Stort Crossing."*

These access improvements are indicated on the plan in **Appendix E** which includes plans illustrating the proposals.



## **Gilston Village 7**

Gilston Village 7 proposals are for 1,500 new residential dwellings and associated development including schools, shops and a local centre. The proposed Gilston Village 7 location is illustrated in **Appendix A**.

## **Gilston Village 7 impact on Stanstead Abbots**

Local Stanstead Abbots residents are concerned about the potential for additional Gilston Village traffic within Stanstead Abbots. Concerns include new residents wishing to travel by train, choosing to use St Margaret's rail station rather than Harlow or Roydon. This issue has not been addressed within the Gilston 7 Transport Assessment, supporting the current outline application, which suggests that all train users will travel via either Harlow or Roydon Station.

The distance to St Margaret's Station from the centre of Gilston Village 7 by car is approximately 4.8km compared to around 3.5km to Harlow and 4km to Roydon. However, peak period travel times will be influenced by congestion and taking this into account may mean that St Margaret's station is more convenient at certain times of day than Harlow or Roydon. The Gilston 7 Transport Assessment concentrates on rail station access by cycle or by bus. It appears that assumptions on rail travel do not include any use of private car to reach the station and therefore traffic impacts on any of the stations have not been considered.

The transport assessment also does not include Stanstead Abbots within its traffic impact assessment area. Therefore, it assumes that no vehicular traffic from Gilston Village 7 will access Stanstead Abbots.

The Parish Council requests that the potential for vehicular traffic accessing stations, including St Margarets, be considered. This should look at the potential for vehicular traffic and parking to impact upon Stanstead Abbots.



# The Briggens Estate Quarry

## Introduction

This section describes and comments on the proposed quarry development based upon information within various documents produced by Tarmac and on the MAS01 draft allocation comments.

## Draft allocation comments on access and highways

The draft allocation for the site comments on highways and access that:

*"Access to and from the site must be via the B181 (Roydon Road). The entrance to the site must be engineered so that traffic on Roydon Road cannot turn left into the site nor turn right out of the site, in order to prevent site traffic from travelling through Stanstead Abbots.*

*The access strategy to the site will need to fully consider traffic movements between the A414 and the access to the site on the B181. Proposals will need to fully consider the interaction between site related traffic and other highway users, particularly people walking, cycling or riding a horse. Any proposals should include solutions which mitigate impacts on those users,*

*Considerations should include, but not be limited to, the following:*

- *Any junctions proposed on the B181 must be designed to ensure that there are no residual safety concerns, designed to the appropriate standards and must be deliverable*
- *Consideration of and, if necessary, associated alterations to the existing bus stops on the B181*
- *Consideration should be given to vulnerable road users wishing to use the B181 and the impact of large numbers of HGVs using the route, with suitable alternative provision being made as appropriate*
- *Potential re-opening of the west facing slip roads on the A414 with a suitable connection between the slip roads and the B181. This would require operational management of the slips to prevent non-site traffic, and suitable operational arrangements of the underpass under the A414 including consideration/mitigation of any impacts on bridleway Stanstead Abbots 019.*

## Avoiding HGV Routing through Stanstead Abbots

As set out above, the latest draft allocation for Briggens Quarry requires that no traffic may enter the quarry from or leave the quarry towards Stanstead Abbots, through design of the access to prevent left turns in or right turns out.

It is vital that any access be designed as stated in the draft allocation to prevent traffic



turning towards or coming in from Stanstead Abbots as requested by the Parish Council.

It is also vital that vehicles travelling to the site have adequate information about the left in ban from the west, including the access design preventing this turn. Otherwise, HGV drivers may still attempt to travel through the village to access the site.

## **Quarry access and impact on the B181 Roydon Road**

The applicants for the Briggens Estate Mineral Extraction Site (or Briggens Estate Quarry) are Tarmac. Tarmac proposes to extract around 500,000 tonnes of sand and gravel aggregate and potential import of inert material.

A TAA Report prepared and submitted to the Hertfordshire Minerals Local Plan Review in 2018 states (paragraphs 4.1 and 4.2) that:

*"it is assumed that the extraction could generate in the order of 90 loads (i.e 180 movements) per day. Allow for a worse case similar level of importation of material for restoration (180 movements) and RMX traffic (40 movements) a total of 400 movements per day area assumed at this stage. Staff movements will be limited to half a dozen cars in and then out per day.*

*In practical terms this could equate to around 40 movements (20 in and 20 out) in any one hour."*

The impact of the Quarry will therefore be an additional 400 daily HGV movements on the B181 local to the site and around 12 daily car movements.

This TAA describes the local road network close to the proposed site access onto the B180 Roydon Road, including a review of 5 year accident data and states that:

There will be no traffic capacity issues;  
The B181 in the site vicinity is suitable for additional HGV traffic; and  
There are no current road safety issues and there is no evidence to suggest that the proposals will be detrimental to highway safety.

This original TAA did look at 5 year accident data which is included in Appendix A of the TAA and concluded no particular accident hot spots or patterns, although no analysis of the accidents is actually given and so it is assumed that this conclusion is reached by looking at the plan, rather than reviewing individual accidents.

In discussing the existing road network, the TAA states (paragraphs 2.1 and 2.2):

*"The site is located adjacent to and will be accessed from the B181. In the vicinity of the site this is a 7.3m wide single carriageway road with a generally straight alignment.*

*Approximately halfway along the site frontage, the speed limit reduces from the mandatory national limit to 30mph. There is a gateway feature with a central refuge and road markings at this point. The road has a 1.2m wide footway on the southern side.*



And (paragraphs 3.2, 3.3 and 3.4):

*"In terms of the general form of the access junction, the number of vehicles turning into and out the site will be relatively modest. Whilst the road is derestricted with mainline through traffic moving relatively slow given the location of the 30mph zone.*

*Assessment of the site access from 2006 confirmed vehicle speeds to be in the order of 43mph (85<sup>th</sup> Percentile). Recent visits to the site confirm that there is unlikely to be any significant change from that previous survey. For robustness it is assumed that the design speed would be 85 kph (53mph), although that could be reduced at the detailed design stage.*

*TD42/95 requires a ghost island right turn lane for flows on the mainline over 13,000 AADT and on the minor road of 500 AADT. Neither of these thresholds are breached in this case and as set out above approach traffic speeds relatively modest. No ghost island right turn lane is thus considered necessary."*

Although the TAA refers both to speeds and to the fact that traffic flow is lower than 13,000 AADT (implying that data is available), neither speed data nor traffic flow data is included with the report.

DFT data included in **Appendix B** shows AADT traffic flows in 2009 to be around 5,000 vehicles. On a recent site visit in October 2020, a sample survey on the B181 close to the proposed access point showed speeds in excess of 50mph. This sample was not statistically conclusive, being only for a few minutes. However, it does not concur with the report which states much lower speeds of 43mph 85<sup>th</sup> percentile. The report does not make clear where the 43mph speed was measured and its possible that the site visit observations were at a different location.

The TAA comment that speeds may be lower due to the proximity of the 30mph speed limit zone being "half-way along the site frontage" are misleading. The 30mph speed limit is 150m from the proposed access, which may impact upon the speed of traffic approaching the proposed access from Stanstead Abbots direction but will have no impact upon the speed of traffic approaching from the A414 direction. Note that from this direction, the required sight line of 215m (based on the speed limit) is measured to the nearside kerb to allow for overtaking traffic.

Accurate, up to date traffic flow and speed data, measured at the appropriate points on the B181, is critical to independent corroboration of the suitability of the proposed Quarry access. The Parish Council therefore requests that this information be provided and suitably assessed as part of the HCC Minerals Local Plan Review. Given the fundamental importance of access, such information should not wait until a planning application before being presented.

Paragraphs 2.4 and 2.5 of the TAA state:

*"To the south east of the site frontage, the B181 connects to the A414 at a grade separated junction with north facing slips only.*

*The junction with the northbound (on) slip road has been designed in accordance with the DMRB. It has a segregated left turn filter lane and visibility to and from*





*the junction is good. The southbound (off) slip has a dedicated left and right turn lane and generous visibility."*

These TAA comments about the exit and entry slips to the A414 are misleading. Whilst the on-slip might meet DMRB standards of visibility if the speeds are 50mph or below, the comment about the southbound off slip having "generous" visibility is wrong. Not only are visibilities sub-standard but they are very poor, with a visibility to the right of 30m compared to a required minimum of 160m and possibly 215m depending upon measured speeds.

Assessment of the poor visibility on the exit slip as an accident risk, is supported by an accident record for this junction. There were 4 accidents in the latest 5 years, at least 3 of which were right turn accidents and one of which was serious. It is recognized that accident data presented in the TAA of January 2018 did not show such a strong accident pattern. However, the David L Walker Traffic Access and Options report (May 2020) paragraph 2.8 states:

*"in principle, it has been established that this short stretch of the B181 is capable (in safety and capacity terms) to handle the amount of HGV traffic that the proposed scheme could generate."*

This statement is no longer supported by the accident data to date in 2021.

The TAA states (paragraph 1.4) that:

*"The methodology adopted in the appraisal of impact takes into account the guidance within the National Planning Policy Guidance notes, the Department for Transport's Guidance on Transport Assessments (2007, withdrawn 2012) and the Institute of Environmental Management and Assessment (IEMA) Guidance Note No1 "Guidelines for the Environmental Assessment of Road Traffic"."*

The IEMA guidance recommends separate assessment of links where either the traffic flows or HGV flows have increased by more than 30%. The increase on the B181 is forecast to be more 14 fold (from 27 to 428 per day) and so requires a detailed environmental impact assessment for the B181 along the length affected from the Quarry to the A414. One of the key environmental impacts to be assessed along this section is accident risk. IEMA Guidance says (paragraph 4.42):

*"Where a development is expected to produce a change in the character of traffic (eg. HGV movements on rural roads), then data on existing accident levels may not be sufficient. Professional judgement will be needed to assess the implications of local circumstances, or factors which may elevate or lessen risks of accidents, eg. Junction conflicts. The assessor may find it valuable to refer to the Institution of Highways and Transportation publication on the safety auditing of highways."*

Applying this IEMA Guidance means acknowledging that the Quarry will change the character of the B181 in the site vicinity due to the significant increase in HGV movements. Therefore, it is not sufficient to only consider historical accident records. Instead, according to the guidance, professional judgement should be used to assess local circumstance and factors that may elevate accident risk. These factors should include sub-standard junction geometries.



Not only does the A414 exit slip onto the B181 have an identified historic pattern of accidents but it also has sub-standard geometry. There is:

An existing accident pattern of 4 accidents in 5 years for vehicles turning right from the A414 exit slip onto the B181 towards Stanstead Abbots colliding with vehicles on the B181 of which one accident involved an HGV and one was serious; and  
Substandard visibility splays at the exit slip with visibility to the right of 30m and to the left of 100m, both of which are significantly below the 215m visibility required for the speed limit on the road.

Currently there are likely to be very few HGVs passing through this junction, and yet one HGV accident has been recorded. HGVs are more likely than other vehicles to be involved in accidents at this intersection because they will accelerate more slowly and are physically longer than cars and will therefore spend significantly longer than cars blocking oncoming B181 traffic. The expected significant increase in HGVs making this movement may therefore have significant impact on accidents at this intersection, irrespective of any existing accident pattern.

The Parish Council believes that the increase in HGV traffic associated with the Quarry will result in a significant and unacceptable increase in accident risk at the A414 exit slip with the B181. The Parish Council requests that an independent Safety Audit be undertaken on this junction, considering the expected impact of the Quarry. This would be in line with IEMA guidance. Subject to the conclusions of a safety audit, the Parish Council believes that suitable mitigation might include:

Significantly improving visibility onto the B181 left both and right; and  
Introducing street lighting in the vicinity of the entry and exit slips.

It is worth noting that the draft text of the allocation does not refer directly to any existing accident record on the A414 slips or the B181 and does not acknowledge the potential change in character of this section of road due to the quarry operations.

There are five right turn accidents for vehicles turning into the A414 slip from the B181 Roydon direction in the past five years of which two were serious.

The Quarry will not change either traffic turning into the slip or traffic opposing this turn. However, the proposed right turn into the Quarry is like this existing right turn into the A414 slip. It is possible that the slip turn accident pattern could be repeated at the Quarry access. Furthermore, in line with IEMA guidance, because of the significant change introduced by the fact that all nearly all turning traffic will be HGVs, which is likely to exacerbate accident risk, this new risk should be investigated, and potential mitigation put in place.

It is worth noting that there is no street lighting at the slip road junctions or at the Quarry site access and this may be a contributory factor to existing accident risk. Existing accident data should be examined to see if dark or wet/overcast conditions are a factor. As with the A414 exit slip, the Parish Council requests that the Quarry access proposals be safety audited.

Note that this review has been undertaken on the DTA TAA dated 18 January 2018 that was available from the HCC Minerals Local Plan Review Website. More recent work



has been undertaken on behalf of Tarmac by DTA and a TAA dated April 2020 is referred to in by David L Walker Ltd in their report "Highways Access and Options Report" Dated May 2020. The main text of this report was provided to Stanstead Abbots Parish Council. The DTA report and a revised access arrangement plan are listed as appendices to this David L Walker report but unfortunately the appendices were not provided with the text.

## **HGV routing westwards**

The David L Walker Highways Access and Options Appraisal Report sets out a range for options for accessing westbound markets, whilst maintaining that these options are unnecessary as westbound markets won't be pursued by Tarmac. The Parish Council, as with HCC, feels that such a future market cannot be ruled out and it would therefore be prudent to assess the impact of westbound HGVs.

The Parish Council believes that, unless the access design physically prevents vehicles entering or leaving site from or to the west, HGVs will be strongly tempted to travel through the village because all alternatives will take significantly longer. The Parish Council therefore agrees with the HCC draft allocation requirement for an access design to prevent right turning out or left turning in HGVs at the Quarry access. However, this design solution also requires that the operator provides all drivers with adequate information about the left in ban from the west, including the access design preventing this turn. Otherwise, HGV drivers may still attempt to travel through the village to access the site.

The Parish Council is very concerned with the HCC draft allocation emphasis on the re-opening of the west facing slip roads on the A414 with a suitable connection between the slip roads and the B181. The draft allocation states that:

*"This would require operational management of the slips to prevent non-site traffic, and suitable operational arrangements of the underpass under the A414 including consideration/mitigation of any impacts on bridleway Stansted Abbots 019".*

The Parish Council does not wish to see westbound access to and from the A414 via the existing slips at Netherfield Lane as this would have significant detrimental impact on a valued local area including on the Netherfield Lane Bridleway and the RSPB nature reserve just south of the A414.

It is difficult to see how the impacts on the bridleway and nature reserve can be managed or mitigated during construction and operation of the quarry. Note reports produced on behalf of Tarmac refer to a temporary operational closure, but given that the Quarry is expected to operate for around 20 years, this is actually a permanent closure.

For the option to reopen and use the west facing slips from the A414, the operational impact on the bridleway would be significant. The offslip traffic would cross the bridleway just north of the A414 and the onslip traffic would travel along the bridleway for a distance in excess of 50m including the 30m underpass. Assuming that 50% of traffic from the quarry uses the westbound slips, this would be around 100 inbound and 100 outbound HGV movements a day using each of the



slips. This is around 10 per hour assuming a 10 hour operational day, or around 1 HGV roughly every 5-6 minutes.

**Appendix F** shows a photograph of the underpass and approach to it from the bridleway. The underpass has been measured at 5m in width and 5m in height. This width is too narrow to provide a footway adjacent to a vehicular route suitable for HGV traffic. The bridleway is used by significant numbers of cyclists. The width is also insufficient to provide a footway/cycleway and vehicle route.

The only way to manage the HGV quarry traffic and the bridleway would seem to be by controlling use of the route under the A414 to stop walkers and cyclists whilst HGV traffic is on it. Perhaps by use of traffic lights. However, it is difficult to see how this could be made to work and would require significant wait times for walkers to clear the route for example.

The bridleway would also need to be managed to control conflicts between crossing traffic coming off the A414 on the northern offslip and walkers and cyclists on the bridleway.

The Parish Council therefore strongly objects to the proposal to reopen the west facing slips because of its significant detrimental impact on the bridleway and nature reserve.

The Parish Council also has significant concerns about how a route across the field from the slips would safely access the B181. An additional access with traffic turning right in or left out will only exacerbate the existing accident record on the B181 at the A414 accesses and will therefore increase accident risk. New accesses on the opposite side to the existing ones will also increase risk for vulnerable road users including pedestrians and cyclists who already use the B181.

The draft allocation does not rule out other options for access to Quarry from the west. The Parish Council believes that none of the alternatives to the west facing slips presented in the David L Walker Highways Access and Options Appraisal Report are suitable. The report is difficult to understand as the appendices are not provided. The report conclusions don't seem to suggest any preferred solutions from the 8 presented. However, correspondence with Tarmac's agent (Included in **Appendix F**) states:

*"our preferred option remains Option D. However, should we need to facilitate materials heading west from the site our preferred option is to head east on the A414 and then effectively do a U-turn at an improved junction at Church Lane (Option H)."*

Option D is use of the existing road network including the A414 off and on-slips as they currently are and therefore no local provision for westbound movement of HGVs.

Option H allows for changes (or as the text states "improvements" to the planned Church Road/A414 signal junction (plans included in **Appendix E**) to allow a U turn to take place.

The Parish Council maintains that option D is unsatisfactory because proposed Church Lane signals and proposed signals to replace the Eastwick Road/Fifth Avenue



Roundabout mean that there will be no future routes to allow westbound movement of HGVs at all.

The David L Walker report does refer to a viable U-turn option H at Church Lane stating (Paragraph 8.4.2):

*"[section 3 of the DTA TAA Report 2020] addresses the technical considerations raised by the Councils Highways experts regarding the Church Lane option and clearly demonstrates that a safe and sustainable means of using this junction to afford access to the westbound means of using this junction to afford access to the westbound carriageway, in the event that an eastbound site was not desirable."*

The Parish Council remains sceptical of this option. The plans and technical considerations showing this have not been provided to the Parish Council. The most recent correspondence with Tarmac's agent (**Appendix F**) states:

*"There is currently still some work underway in terms of highways appraisals so we will not be in a position to share the full appendices until that work is complete"*.

This statement seriously undermines the David L Walker May 2020 Report which relies on the TAA April 2020 report in its conclusions of a safe and effective access to the Quarry. The appraisal work referred to would need to include modelling work to demonstrate the signals can operate both within capacity and safely with such a U Turn stage included.

In conclusion, in the Parish Council:

- Strongly objects to the HCC draft allocation suggestion of reopening the west facing A414 slips for access to the quarry from and to the west, because it would have a significant detrimental impact upon the existing bridleway there;
- Believes that no other option has been presented for access to markets to the west that has been demonstrated to be feasible and having an acceptable impact; and
- Accepts the proposed draft allocation Quarry access arrangement that physically prevents access to and from the north B181 and Stanstead Abbots, but is concerned that it will be difficult to implement in practice and would still require that all drivers arriving be fully informed that there is no access to the site from Stanstead Abbots.



# Neighbourhood Plan Development

## Introduction

The Draft Stanstead Abbots and St Margaret's Neighbourhood Plan allocates sites for a total of 94 new homes upto 2033.

## Draft Neighbourhood Plan housing policy H3

Site Allocation Policy SASM H3 on land east of Netherfield Lane/South of Roydon Road is for a mixed use development including employment plus approximately 60 homes. This site is indicated on the plan in **Appendix A**.

There are concerns that this allocation will add traffic to the B181 Roydon Road in the vicinity of the B180 Hunsdon Road junction and Cat Hill. The B180 Hunsdon Road junction is perceived to be unsafe, particularly given the speed of B181 traffic and difficulties in exiting the B180 Hunsdon Road. This issue should be fully assessed as part of any Transport Assessment accompanying a future planning application for this site.



## Conclusions

The Parish Council are concerned about the cumulative highways impacts on Stanstead Abbots of the proposed Briggens Estate Quarry, Gilston Village 7 proposals for up to 1,500 new homes, and draft Stanstead Abbots and St Margaret's Neighbourhood Plan proposals including for 60 new dwellings off Netherfield Lane.

The key concerns of residents (as represented by the Parish Council) are:

- Non-observance of the lorry ban – with lorries regularly travelling through the village ignoring the signed ban – this concern may in part be removed by the proposed design physically preventing left turns in or right turns out of the access – subject to a suitable design being agreed, although in practice ensuring that all drivers are fully aware of the ban may be difficult;
- The significant negative impact on the existing Bridleway at Netherfield Lane of the reopening of west facing A414 slips to provide western access to and from the quarry;
- Increased accident risk on the B181 at the new access and at the A414 slips, and potentially at the new west facing access to slips;
- Speeding on Cappell Lane on the northern approach to the village to and from Ware;
- Speeding on Cat Hill, the B181 Roydon Road approach to Stanstead Abbots by the B180 Hunsdon Road;
- The impact on the town of additional traffic from Gilston Village 7, including the possibility of significant increase in traffic using St Margaret's Station; and
- The cumulative traffic impacts on Stanstead Abbots due to the Quarry, Gilston Village 7, and Neighbourhood plan development.

The Gilston Village 7 assessment accompanying the outline planning application does not include Stanstead Abbots within its traffic impact assessment area. The Parish Council requests that the impact of vehicular traffic accessing rail stations, including St Margaret's, be considered. This should look at the potential for vehicular traffic and parking to impact upon Stanstead Abbots.

The Briggens Estate Quarry assessment suggests an additional 400 daily HGV movements on the B181 local to the proposed Quarry site and around 12 daily car movements. B181 traffic flow, speed and accident data are all critical to the determination of the suitability of any proposed Quarry access.

The Tarmac documents presented to the Parish Council for review refer to out of date traffic flow and speed data and include out of date traffic accident data. The Parish Council requests that up-to-date traffic speed, flow and accident data be provided and suitably assessed as part of the HCC Minerals Local Plan Review. Such assessment is fundamental to deciding whether the Quarry site should be allocated for mineral extraction and should therefore not wait until a planning application before being properly presented.

The Parish Council believes that the increase in HGV traffic associated with the Quarry will result in a significant and unacceptable increase in accident risk at the A414





exit slip with the B181. The Parish Council requests that an independent Safety Audit be undertaken on this junction, considering the expected impact of the Quarry. This would be in line with IEMA guidance. Subject to the conclusions of a safety audit, the Parish Council believes that suitable mitigation might include:

Significantly improving visibility onto the B181 left both and right; and  
Introducing street lighting in the vicinity of the entry and exit slips.

The Parish Council believes that the Quarry access proposals may represent an unacceptable accident risk. According to IEMA Guidance, the safety of the proposals should be properly assessed to consider the significant change in character brought about by the proposed level of HGV traffic. The Parish Council would wish to see a full and independent safety audit of the proposed access, including an audit of the proposed design to prevent traffic heading to or from Stansted Abbots.

The Parish Council disputes the conclusions of the David L Walker report (May 2020) on the Quarry that states (paragraph 2.8):

*"in principle, it has been established that this short stretch of the B181 is capable (in safety and capacity terms) to handle the amount of HGV traffic that the proposed scheme could generate."*

These conclusions rely heavily on a TAA Report (April 2020) that Tarmac's agent will not release to the Parish Council (See correspondence in **Appendix G**).

The Parish Council believes that none of the options for westbound access are suitable. These include the reopening of the westbound A414 slips as suggested in the HCC draft allocation document and the alternatives presented in the David L Walker Highways Access and Options Appraisal Report. The report includes Tarmac's preferred options D and H which are use of existing A414, with option H suggesting U turns may take place at the proposed Church Lane signals.

The Parish Council is concerned about potential increase in accident risk on the B181 Roydon Road due to the draft Neighbourhood Plan allocation H3 for upto 60 dwellings at Netherfield Lane. This risk should be fully assessed as part of any Transport Assessment accompanying a future planning application for this site.







## HEALTH CHECK REPORT TO STANSTEAD ABBOTTS PARISH COUNCIL

### IN RESPECT OF

## STANSTEAD ABBOTTS & ST MARGARETS DRAFT NEIGHBOURHOOD PLAN 2017-2033

Author: Andrew Seaman BA (Hons) MA MRTPI

Report (Ver. 1.1): 26 January 2024

Stanstead Abbots & St Margarets Draft Neighbourhood Plan 2017-2033

Produced by Stanstead Abbots (lead council), St Margarets and Great Amwell Parish Councils

Health Check – January 2024<sup>1</sup>: Undertaken by Andrew Seaman BA (Hons) MA MRTPI

The Stanstead Abbots & St Margarets Neighbourhood Plan (NP) has clearly been informed by a knowledge of the affected parishes and the immediate local area. It includes consideration of the views of the local community, which is an integral element of the neighbourhood planning process. At this stage and following the Regulation 14 consultation, the NP is supported by a draft Basic Conditions Statement and Consultation Statement. These documents are critical to the overall content and justification of the NP and their further review and amendment should be expedited to ensure that the content of the plan demonstrably meets the relevant Basic Conditions. A Strategic Environmental Assessment (SEA) Report and Habitats Regulations Assessment (HRA) have been undertaken but will require further updates.

The NP is logically structured and well presented. Some aspects of its policies would benefit from clarification to ensure that the Basic Conditions are met. The Basic Conditions Statement and Consultation Statement, when finalised, will provide additional opportunities to ensure that the NP represents a clear and cohesive product of community engagement that has regard to the national and local planning context such that it will deliver appropriate forms of sustainable development within the area.

The current NP represents a considered plan which is nearing its submission stage to East Hertfordshire District Council (EHDC). Further discussion with EHDC officers is recommended to assist in finalising the content and evidence of the plan and to ensure that there is no unnecessary replication of the development plan and national policy.

<sup>1</sup> This Report is based on the draft NP and the evidence made available including the Basic Conditions Statement and Consultation Statement. Regard has been had to certain information available on the NP website. The evidence base document supplied had no working links which prohibited an assessment of the cited documents (and unfortunately was not remedied during the period this Health Check was undertaken).

### Summary of Recommendations

#### 1. Process

The NP has been developed by the appointed Steering Group on behalf of the relevant Parish Councils. The Basic Conditions and Consultation Statements must be updated and finalised prior to the submission of the NP to EHDC. These should contain all of the appropriate details of procedural compliance and an up-to-date consideration of the applicable Basic Conditions that should be met by any neighbourhood plan intending to be made. Both should include narrative explanations of the plan production process, including what activities were undertaken and with what results and effect upon the draft NP, particularly those arising from the Regulation 14 consultation. It may be helpful to look at the approaches taken towards the content of such statements in other made neighbourhood plan areas.

- Further liaison and correspondence with EHDC would be prudent to ensure, as far as practical, that the authority is in agreement with the process of the NP production and its draft content, including the approach towards housing. This is particularly relevant to the general conformity of the NP to the strategic policies of the development plan, which includes the East Hertfordshire District Plan 2018 (EHDP).<sup>2</sup>

- Evidence must also be provided indicating how the issue of equality has been considered. An Equalities Impact Statement would be a helpful addition and EHDC may be able to advise further on this matter.

## 2. **Content**

- The NP is drafted to take into account national planning policy, including the requirement to plan positively for sustainable forms of development (which is also a Basic Condition). The latest updates to the National Planning Policy Framework (NPPF) of December 2023 should be reflected in further amendments to the plan.

<sup>2</sup> [The East Herts District Plan 2018 | East Herts District Council](#)

- The NP has a 'vision' (Chapter 3) and a series of objectives which inform the policies of the plan and are derived from public feedback. The Basic Conditions Statement and Consultation Statement provide a further opportunity to explain how the vision and objectives have been informed by the community engagement undertaken and how the legal requirements for the production of the plan have been satisfied.
- There are 33 policies within the NP, the majority of which are clearly presented. Some of the policies require further review before submission is undertaken to ensure that they are suitably justified and not repetitious of local or national policy. Specific amendments will ensure they are justified, have regard to national policy, are in general conformity with the strategic policies of the development plan and will be effective in implementation. It would be prudent to ensure that the evidence for the policies is robust and clearly presented, particularly in terms of methodology and analysis. Some suggested amendments for consideration are set out in Part 3 of this Health Check. EHDC officers may be able to assist further.
- Liaison with EHDC should be made to ensure the general conformity of the NP with the strategic policies of the development plan. A Statement of Common Ground (SOCG) with EHDC would be a useful addition to the evidence base prior to formal submission for examination, alongside any further additions to the Basic Conditions Statement.
- An implementation and monitoring section should be included within the NP explaining how the policies will be monitored for their effectiveness. A helpful guide is available [here](#).

### Part 1 – Process

	Criteria	Source	Response/Comments
1.1	Have the necessary statutory requirements been met in terms of the designation of the neighbourhood area?	<b>NP</b> <b>Basic Conditions Statement</b>	The NP and its website refer to the preparation process for the plan and that EHDC designated the NP area (across three parishes) as a neighbourhood planning area on 11 September 2018. The area is shown in Figure 1. However, there is no specific documentary evidence available, for example the Basic Conditions Statement, indicating how the area was designated. <sup>3</sup> In the absence of documentation, it cannot be confirmed if the necessary statutory requirements have been met in the designation of the neighbourhood area albeit there is no suggestion otherwise. This should be clarified in detail within the Basic Conditions Statement with evidence (e.g., correspondence and the formal decision of EHDC). The Basic Conditions Statement should include a copy of the confirmation and any relevant report/minutes of the designation from EHDC. Subject to the inclusion of necessary documentation within the NP and its supporting evidence, the statutory requirements appear capable of being demonstrated.

the consultation statement says designated area was approved by EHDC on 11/9/18, as does the Basic Conditions Statement



1.2	If the area does not have a parish council, have the necessary statutory requirements been met in terms of the designation of the Parish Council?	<b>NP Basic Conditions Statement</b>	The NP is being produced by the three Parish Councils led by Stanstead Abbots Parish Council.
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<sup>3</sup> The designation request and map showing the neighbourhood area are available on EHDC's website: <https://www.eastherts.gov.uk/planning-building/planning-policy/neighbourhood-planning-activity-east-herts/stanstead-abbots-and-st-maragrets>

1.3	Has the plan been the subject of appropriate pre- submission consultation, as set out in the legislation, or is this underway?	<b>NP Consultation Statement</b>	<p>The NP has been revised following a Regulation 14 consultation. A Consultation Statement has been produced which includes details of how and when consultation has been undertaken. It would be helpful for this to explain how the vision/aims/objectives and policies of the NP have responded to the community comments/land use aspirations. The Statement should include what changes have been made to the NP in response to the feedback received, particularly after Regulation 14.</p> <p>The NP currently contains a brief summary of consultation and engagement activities, which could be expanded to include commentary on the Regulation 14 outcomes. At present, the balance of evidence suggests that the NP will have been subject to appropriate pre-submission consultation, and this would appear capable of being demonstrated through the NP and the Consultation Statement.</p>
1.4	Has there been a programme of community engagement proportionate to the scale and complexity of the plan?	<b>NP Consultation Statement</b>	<p>The NP and Consultation Statement provide details of the chronology of engagement and consultation activities. As noted above, this should be expanded to demonstrate how engagement has been effective in shaping the NP.</p> <p>The Consultation Statement should include a clear narrative of all activities undertaken which explains the outcome of each engagement activity, who was involved and specifically how they informed the content of the NP.</p> <p>The indications suggest that there will have been a programme of community engagement proportionate to the scale and complexity of the plan albeit the details must be captured within the Consultation Statement.</p>
1.5	Are arrangements in place for an independent examiner to be appointed?	<b>No source</b>	<p>There is no information provided on this. Whilst the qualifying body has not yet reached the stage of submitting the NP to EHDC under Regulation 15, it is advised that discussions could begin or be scheduled on how to identify a suitable independent examiner.</p> <p>Whilst the general approach is to assess the resumes/CVs provided by prospective examiners, you may also find it helpful in coming to a decision by reading examples of their reports on other NPs.</p>
1.6	Are discussions taking place with the electoral services team on holding the referendum?	<b>No source</b>	It is not yet appropriate to put in place arrangements for a referendum after the examination of the plan. However, as the plan continues to advance, discussions should be held with EHDC.

Consultation Statement updated to reflect outcome of Reg 14 Consultation.

Doesn't the council appoint the independent examiner?

1.7	Is there a clear project plan for bringing the plan into force and does it take account of local authority committee cycles?	No source	There is no process set out for bringing the NP into force. This could be developed in liaison with EHDC.
1.8	Has a SEA screening been carried out by the LPA?	NP SEA Report	<p>Whilst the SEA Screening was not provided, a SEA Scoping and Report have been undertaken to support the Regulation 14 NP. The comments of consultees in relation to SEA Screening are not available.</p> <p>The Report concludes that, overall, the NP is not judged likely to lead to any significant negative effects in relation to any of the SEA themes. The Report notes that following Regulation 14 consultation and the consideration of responses, the NP and SEA Environmental Report will be finalised for submission. This must include consideration of the consultation comments, including Natural England (not supplied), particularly in relation to the potential impacts on Rye Meads Site of Special Scientific Interest (SSSI).</p> <p>The SEA should be updated to accompany the submission version of the NP.</p>
1.9	Has a HRA screening been carried out by the LPA?	NP HRA Report	<p>A HRA has been undertaken as potential impacts upon the Lee Valley Special Protection Area(SPA)/Ramsar could not be screened out. The HRA concludes that, with the implementation of EHDC Policy WAT6, the NP would contain a sufficient policy framework to ensure no adverse effects on the integrity of European sites would occur in isolation or in combination with other projects and plans. It was recommended that the NP includes a new policy to state that support for new dwellings is contingent on the delivery of housing keeping pace with upgrades to Rye Meads Waste Water Treatment Works to ensure no adverse effect on the integrity of the SPA/Ramsar. This has been done.</p> <p>The HRA should be reviewed for the need for updates to reflect the changes undertaken since Regulation 14, that consultation has been undertaken in accordance with regulations and any resulting comments taken into account as necessary.</p> <p>The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 were made on 5 December 2018 and came into force on 28 December 2018. These amend the prescribed Basic Condition related to Habitats Assessments - the revised Basic Condition took effect from 28 December 2018. See the following link:  <a href="http://www.legislation.gov.uk/uksi/2018/1307/contents/made">http://www.legislation.gov.uk/uksi/2018/1307/contents/made</a>  (Regulation 3). This amendment follows the ruling of the European Court in People over Wind and Sweetman on 12 April 2018.</p>



**Part 2 – Content**

	Criteria	Source	Response/Comments
2.1	Are policies appropriately justified with a clear rationale?	NP	<p>The NP is informed by an understanding of the existing development plan in the EHDC area.</p> <p>The NP has a 'vision' (Chapter 3) which it is assumed is derived from the feedback of the community. This should be clarified within the NP and Consultation Statement. Thereafter the NP has 17 objectives grouped under 7 themes. The rationale for the objectives is not abundantly clear and the Consultation Statement should be used to explain how the vision, objectives and policies have been derived.</p> <p>There are 33 planning policies within the NP. These are grouped under the 7 themes (Housing and Design, Riverside, Heritage, Natural Environment, Leisure &amp; Community Facilities, Business &amp; Employment, and Transport).</p> <p>The policies are supported by text which seeks to explain the justification for the policies with cross references to the supporting evidence. In some instances, the supporting text should be reviewed to ensure it is clearly explaining the evidence and justification for the policies which follow. The policies are generally clear and seek to address land use matters. There is scope for the policies to be further reviewed prior to the submission of the NP to EHDC.</p> <p>The policies are generally well presented. In a few instances, there is a necessity to ensure that some policies are clearer<sup>4</sup> in their wording and purpose so as to aid future effective implementation. Some policies repeat the existing provisions of national and development policy which should be avoided.<sup>5</sup> Liaison with EHDC is recommended to discuss the policy wording.</p> <p>Some examples for potential amended wording are identified below (see detailed comments in Part 3).</p> <p>There is useful advice to be found here: <a href="https://neighbourhoodplanning.org/wp-content/uploads/Writing-planning-policies-toolkit-HK-071218-0907-COMPLETED-JS-complete-.pdf">https://neighbourhoodplanning.org/wp-content/uploads/Writing-planning-policies-toolkit-HK-071218-0907-COMPLETED-JS-complete-.pdf</a></p> <p>Each policy is clearly identified by separated text. There is no doubt what constitutes proposed planning policy.</p>

<sup>4</sup> See PPG Reference ID: 41-041-20140306.

2.2	Is it clear which parts of the draft plan form the 'neighbourhood plan proposal' (i.e., the neighbourhood <i>development plan</i> ) under the Localism Act, subject to the independent examination, and which parts do not form part of the 'plan proposal', and would not be tested by the independent examination?	NP	The NP is supported by a contents table and runs to 126 pages including appendices. The document is legibly laid out although some of the maps/figures should be reviewed for their legibility (eg Figure 3). The NP clearly identifies which parts of the plan are planning policies. Subject to amendments (as recommended), there is sufficient clarity as to what is the NP and what will be the subject of examination.
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<sup>5</sup> NPPF, Paragraph 16 f).

2.3	Are there any obvious conflicts with the NPPF?	NP Basic Conditions Statement	Section 3 below identifies matters where clarity could be enhanced and potential conflicts avoided.
2.4	Is there a clear explanation of the ways the plan contributes to the achievement of sustainable development?	NP Basic Conditions Statement	The NP is drafted in a broadly positive manner with some reference in support of sustainable forms of development (eg the vision and objectives and other policy references) and the inclusion of Policy SASM H2, which refers to matters affecting housing and sustainable development. It would be prudent to explain more fully how the NP will contribute towards sustainable forms of development (because this is a Basic Condition) within the NP. The Basic Conditions Statement could be expanded to explain how the NP will contribute to achieving sustainable development. Subject to additional explanation, the NP and its evidence should be capable of indicating how a suitable contribution to the achievement of sustainable development will be secured.
2.5	Are there any issues around compatibility with human rights or EU obligations?	NP Basic Conditions Statement	There is no evidence on this matter. The Basic Conditions Statement should include details which show how Human Rights and EU obligations (under retained EU law) have been assessed. This could be supplemented by the production of an equalities impact assessment/statement clearly indicating how equality has been addressed in the plan production process. From an assessment of the documents received it cannot be concluded that there are no outstanding issues regarding compatibility with human rights and EU obligations.
2.6	Does the plan avoid dealing with excluded development including nationally significant infrastructure, waste and minerals?	NP Basic Conditions Statement	The NP policies do avoid dealing specifically with such excluded development.



2.7	Is there consensus between the local planning authority and the qualifying body over whether the plan meets the basic conditions including conformity with strategic development plan policy and, if not, what are the areas of disagreement?	NP	<p>There is no evidence to demonstrate a clear consensus (or otherwise) between the Parish Councils and EHDC. This should be remedied (by further minuted meetings/correspondence), ideally before submission. Any areas of obvious disagreement should be obviated or minimised. A SOCG would be helpful.</p> <p>If appropriate, the Parish Councils could consider the Locality advice on establishing a Memorandum of Understanding with EHDC (and others). A guide is available <a href="#">here</a>.</p> <p>It cannot be concluded at the present time that there are no potential issues of general non-conformity (i.e., disagreement) with the strategic development plan policies of the extant development plan.</p> <p>Advice on the issue of 'conformity' is available <a href="#">here</a>.</p>
2.8	Are there any obvious errors in the plan?	NP	Some suggestions are made in Part 3 below.
2.9	Are the plan's policies clear and unambiguous and do they reflect the community's land use aspirations?	NP	<p>Detailed comments are made below on the content and drafting of the NP's policies.</p> <p>It is recommended that the policies be further reviewed prior to submission of the plan. Some policies would benefit from greater clarity to aid their implementation and with clearer links to supporting evidence without which they would not be justified. Repetition with the development plan should be avoided. A further 'sense check' and refinement to ensure that they are clear and effective is required (regard should be had to the advice in the PPG<sup>6</sup>).</p>

<sup>6</sup> See PPG Reference ID: 41-041-20140306.



**Part 3 - Detailed Comments**

1. These detailed comments address all matters, both of significance and of a more minor nature, across the current NP and are presented in page order. For ease of understanding, the following comments should be read alongside the draft NP.
2. The title page includes the intended plan period over which the NP is intended to operate (2017-2033). Whilst this period is presumably designed to reflect the EHDP housing intentions, given that the NP is likely to be made in 2024 consideration should be given to amending the plan period to operate from 2024-2033. In either circumstance, the text of the plan should explain the plan period.
3. Pages 1-4. A contents page is always helpful and good to see.

**Introduction Pages 5-8**

4. The introduction provides an explanation for the production of the plan and the process undertaken. The addition of a cross reference to the Basic Conditions and Consultation Statements would be informative (notwithstanding the subsequent references at paragraphs 1.6 and 1.12).
5. Paragraph 1.4 (and elsewhere) refers to the superseded version of the NPPF; all such references should be updated to reflect the latest version (December 2023).
6. Paragraph 1.5 refers to the intended 'adopted Neighbourhood Plan'. Technically, the NP will be 'made'.
7. Paragraph 1.6 states that the NP must 'comply' with other local, national and European policies. Strictly speaking, the legislation does not require compliance with all policies (e.g. the Basic Conditions require general conformity with strategic policies) so compliance could be amended to 'have specific regard' or similar.
8. Paragraph 1.9 states that Flood Zones 2 and 3 were not going to be acceptable. It would be helpful to clarify this sentence by explaining why and to whom. National planning policy does not automatically preclude residential development on Flood Zone 2.
9. Paragraph 1.11, an additional comma after 'survey' would be helpful.

**Planning Policy and Spatial Context Pages 9-12**

10. Paragraph 2.2 repeats paragraph 2.1 and should be deleted. Paragraph 2.1 should be updated to reflect the latest version of the NPPF.
11. It would be useful to explain that the NP has been written to be in general conformity with the strategic policies of the development plan with a cross reference to the Basic Conditions Statement which should, when finalised, provide further details on this point.

**Vision and Objectives Pages 12-13**

12. The NP contains a clear vision statement at paragraph 3.2 which includes an appropriate reference to sustainable forms of development. It would be helpful and informative to explain how this has been derived, particularly in terms of the community feedback received.
13. Similarly, paragraph 3.3 sets out the themed objectives for the NP and it would be helpful for the plan to explain how these have been identified, how they relate to the policies which follow and how they would specifically assist in delivering the vision; a cross reference to the Consultation Statement which could explain these matters more fully, in the context of community feedback received, would be prudent.

**Policies (general)**

14. Throughout the NP and before submission, all policies should be reviewed against the advice of the PPG which states: *"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared"*.<sup>7</sup>

<sup>7</sup> PPG Reference ID: 41-041-20140306.

15. Regard should also be had to the helpful Locality advice on how to write planning policies<sup>8</sup> which includes the following, *"The golden rule is that your policies should be clear, precise, positive, relevant and capable of being delivered. They also need to be evidence based (see Box 1)"*.

<sup>8</sup> <https://neighbourhoodplanning.org/toolkits-and-guidance/write-planning-policies-neighbourhood-plan/>



**Box 1 – Top tips for writing planning policies**

**Write in everyday English** – try to avoid jargon and stick to common sense language.

**Avoid duplication** – there is little point in addressing issues that are already covered by the policies in your Local Plan.

**Be clear** – avoid ambiguity and be as precise as you can about the intention of your policy.

**Vision and objectives** – each planning policy should stem from a clear vision for your neighbourhood and help deliver at least one of your plan's objectives.

**Stand out** – the policies are the centrepiece of your neighbourhood plan – make them stand out by putting them in a box in clear bold text.

**Evidence** – you can't just include policies on a whim, they need to be backed up by robust evidence and rooted in the feedback from your public engagement.

**Keep it local** – your planning policies cannot conflict with Central Government policy or challenge the strategic elements of your local authority's planning policies.

**Targets** – use your policies to set targets or provide indicators which can be used to monitor success.

**Be positive** – word policies to welcome development that meets your expectations instead of turning development away.

**Delivery** – your policies need be capable of being delivered within the time frame.

16. Overall, the policies of the NP are reasonably structured and appropriately presented. Some policies of the NP would benefit from further review against this context and potential amendment to maximise their effectiveness.

17. The Locality 'Roadmap'<sup>9</sup> advises that the input of district/borough council officers will often be useful in ensuring that the planning policies of any NP are suitably drafted as it can be a time consuming and challenging task. It is recommended that liaison be undertaken with EHDC prior to submission in order to refine the NP policies and its content/evidence. This could ensure that the extant Local Plan policies are appropriately referenced and that unnecessary repetition is avoided.

**Housing Pages 15 - 27**

18. The NP recognises the context provided by the EHDP and establishes that at least 94 homes should be provided over the plan period. In so doing, the NP draws on evidence that includes the feedback of the community, the commissioned AECOM studies and notes the Green Belt designation of the area and the potential need for exceptional circumstances to be demonstrated to alter the Green Belt boundaries. This is appropriate.

19. The references to the NPPF require updating to reflect the latest version.

update reference to most recent version

20. Policy SASM H1, as supported by Figure 5, is a clear and precise policy which amends the village development boundary and effectively removes a land parcel from the Green Belt. Whilst this is likely to be a detailed matter for consideration at any forthcoming examination, the NP reasonably draws on its evidence base to conclude that, in order to accommodate the necessary housing for the area, the preferred option is to allocate land which necessitates the changes contained in Policy SASM H1.

<p>21. Paragraph 4.12 asserts that potential housing sites that were considered needed to be 'clear of Flood Zones 2 and 3'. However, the reasoning for this is not established. It is recommended that additional text be included to explain why, in the context of the sequential approach of national and local policy, the site selection process established the necessity for sites to not substantively include Flood Zone 2.</p>	<p>change para 4.12 to refer to Flood Zone 3 only. SG site assessment criteria excluded development in FZ3.</p>
<p><sup>9</sup> <a href="https://neighbourhoodplanning.org/toolkits-and-guidance/create-neighbourhood-plan-step-by-step-roadmap-guide/">https://neighbourhoodplanning.org/toolkits-and-guidance/create-neighbourhood-plan-step-by-step-roadmap-guide/</a></p>	
<p>22. Evidence is cited in relation to housing site selection, which includes work on site assessments undertaken by the Steering Group and subsequent feedback from consultants. However, this work has not been made available for the purposes of this Health Check. The Parish Councils should assure themselves, feasibly in liaison with EHDC, that the process of site selection is demonstrably robust, particularly in relation to how potential sites were identified and how sites were subsequently assessed, discounted and allocated. This will be a matter of scrutiny for any future examination of the plan. A useful Locality guide is available<sup>10</sup> which could provide a benchmark for reviewing the process undertaken to date.</p>	<p>Evidence was there in appendix. SG view is that this is sufficiently robust.</p>
<p>23. Policy SASM H2 establishes the 'housing numbers' for the plan which is predicated on the EHDP requirement of 94 houses over the NP plan period. The housing is identified to be provided across 4 sites, albeit two of which have planning permission, and one is complete. It would be prudent to seek to establish these facts with EHDC, feasibly within a SoCG. Whilst the policy requires updating to reflect the latest iteration of the NPPF, Policy SASM H2 elements I, II and III are clear and precise. The purpose and justification for criterion IV is less clear. Potential impacts on the SSSI should be considered as part of the final HRA and SEA. At present the SEA considers the previous range of site allocations within the Regulation 14 plan and notes the need for consultation with Natural England given that likely indirect impacts on the protected site will arise. Given that this SEA Report was conducted in 2022 and that Natural England are a necessary consultee on the NP and its evidence, the matter should be resolved prior to the finalisation of the NP for submission. Therefore, the effects on the SSSI should be reviewed and, provided adequate up to date evidence exists, criterion iv should be omitted.</p>	<p>Remove criterion IV Note - final SEA and HRA support sites selected in NP.</p>
<p>24. Policy SASM H3 is a site allocation for 60 homes on land south of Roydon Road. The policy is relatively detailed and on the whole its content is drawn from the available evidence, including the local Masterplanning and Design Guidelines, and is sufficiently clear to be capable of implementation. Criterion IV c) should be omitted as neighbourhood plans are not able to set additional building standards<sup>11</sup> and these are referenced, in any event, within the EHDP Policy HOU7.</p>	<p>remove criterion IV c)</p>
<p><sup>10</sup> <a href="https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/">https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/</a></p>	
<p><sup>11</sup> See: <a href="https://www.gov.uk/government/speeches/planning-update-march-2015">https://www.gov.uk/government/speeches/planning-update-march-2015</a></p>	
<p>25. Whilst the current NP has been updated since the Regulation 14 version, there is no Policy SASM H4 or 5 which is illogical for the final version of the plan. Policy SASM H6 relates to the redevelopment of garages for housing and is reasonably clear although criterion II should be explained in terms of what is expected in responding 'effectively to the topography of the sites'.</p>	<p>renumber policies and change references elsewhere. Change II to "relate to the topography of the site"</p>
<p>26. There is no Policy SASM H7 which is once again illogical for a final plan. Policy SASM H8 relates to a site that is nearing completion. As a consequence, it is unnecessary for its inclusion as planning policy and should be omitted.</p>	<p>in H2 combine c and d and omit H8 entirely</p>
<p>27. Policy SASM H9 would have the effect of preventing any new build housing within the village development boundary unless on previously developed land, including windfall on greenfield sites. If this is the intention,, then it should be justified in the supporting text and discussed with EHDC because, as currently presented, it is not consistent with the approach of the EHDP as it relates to Group 1 villages and their development boundaries.</p>	<p>met with EHDC to clarify</p>



35. The NP explains in proportionate detail why sustainable development along the Riverside is important to its community. Policy SASM R1 sets out a number of expectations with regard to development proposals affecting the Riverside. However, whilst criteria I and II establish that development alongside and adjacent to the river should contribute to improvements and enhancements of the river environment with utilisation of views and vistas etc, there is no indication in the policy or in the supporting text quite how this would be achieved. This introduces a degree of ambiguity into the policy which would make its effective implementation difficult. Therefore, the policy and its supporting text should be reviewed and amended to provide some indication as to what the baseline river environment currently is and what enhancements and improvements may feasibly be. Criterion III welcomes one and two bedroom flats but the rationale for this policy requirement is unclear and should be explained. Criterion IV appears reasonable.

look at the text again to clarify

<sup>12</sup> See <https://www.gov.uk/government/speeches/planning-update-march-2015>

36. Policy SASM R2 states that moorings and floating structures will be acceptable provided, amongst other matters, they do not detract from openness and views of the river. It would be prudent for the supporting text to explain how this may be adjudged (i.e. from where?) and how it may be achieved (as the majority of structures are likely to affect openness). Greater clarity is required to ensure an effective policy. As currently drafted, criterion I c) is incomplete.

take out that sentence in policy

#### Heritage Assets Pages 36 – 41

37. The importance of the area's heritage assets is noted within the NP. The statement of the third sentence of NP paragraph 7.5 should be reviewed and checked with EHDC for its accuracy (as the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) contains specific wording that does not incorporate direct considerations of setting). Alternative wording could be considered which simply omits reference to the Act (as the NPPF does require the consideration of the setting of a heritage asset).

replace with reference to NPPF

38. Policy SASM HA1 relates to designated heritage assets. The first criterion states that development proposals should preserve and enhance the character and appearance of the conservation area. The Act actually states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of such an area; consequently, the policy is not in accord with the statutory requirement. Criteria II and III should be reviewed in liaison with EHDC officers to ensure that it is consistent with national policy. The NPPF allows for development proposals to cause harm to the significance of a heritage asset, if justified, which is not reflected in the NP policy. Given that the EHDP contains Policy HA1, Policy SASM HA1 could be omitted.

leave as is - subject to confirmation from EHDC

39. Policy SASM HA2 identifies 8 non designated heritage assets through an evidence base which has evaluated their significance (Appendix D). Whilst these assets may be subject to scrutiny through the examination process, the policy itself is reasonable.

40. Policy SASM HA3 relates to archaeology. Criterion I is a statement of facts rather than a policy requirement. Criteria II and III should be reviewed against the terms of EHDP Policy HA3 and the NPPF to ensure that unnecessary repetition of policy aims is avoided.

leave as is



41. Policy SASM HA4 identifies 12 'protected views' within the NP area albeit the first sentence of the policy states that 13 were identified. Appendix E is cited in their support as justification for their protection. It would be helpful and informative if the policy was supported by a clear map of the viewpoints contained in the policy. The rationale for the views is relatively brief and may be subject to scrutiny at examination. Additional information which details why the views are deemed important for protection and, specifically, what features hold significance and why may be helpful. Criterion II requires development proposals within such views to be supported by a Landscape and Visual Impact Assessment. In the context of the Landscape Institute's Guidelines<sup>13</sup> and the contained nature of the views identified which limit the scale of development likely to be proposed, such a requirement is disproportionate and not justified. As an alternative, the criterion could simply require consideration of the protected view as part of any proposal's submission documents or, if proportionately required, an appropriate Landscape Visual Assessment.

Reviewed justification for views, to be specific about what it is about the view we are preserving, references to Conservation Area Assessment plan, key characteristics of views; tied in references in policy to more detailed explanations under pictures in Appendix E.

**Natural Environment Pages 42 - 53**

42. The NP contains a suite of policies relating to the natural environment of the plan area. These include the identification within Policy SASM NE1 of 17 Local Green Spaces (LGS). The NP appropriately identifies the national policy context for LGS (albeit paragraph 8.10 needs to be updated to reflect the renumbered NPPF).

43. The NPPF states that<sup>14</sup>:  
The Local Green Space designation should only be used where the green space is:  
(a) in reasonably close proximity to the community it serves;  
(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and  
(c) local in character and is not an extensive tract of land.

SG sub-group reviewed.

<sup>13</sup> <https://www.landscapeinstitute.org/technical-resource/landscape-visual-impact-assessment/>

<sup>14</sup> NPPF, Paragraph 106.

LGS designation should also be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential service, and be capable of enduring beyond the end of the Plan period.<sup>15</sup> National policy clarifies that policies for managing development within LGS should be consistent with those for Green Belts.<sup>16</sup>

44. As a consequence, the evidence in support of any LGS designation should ensure that it addresses the criteria of national policy. NP Appendix G is informative but only addresses 16 of the 17 proposed designations and does not specifically address the issue of proximity, or fulsomely explain why the areas are demonstrably special with a particular local significance. Appendix G should be reviewed and expanded to ensure that it proportionately explains how the NPPF criteria are satisfied in the proposed designations. Guidance is available from Locality on this matter<sup>17</sup>.

45. Policy SASM NE1 II seeks to limit development within the LGS albeit makes reference to the purpose for their designation and links permissible development to its necessity for maintaining and enhancing each LGS. In this latter regard, national policy is clear that policies for managing development within a LGS should be consistent with those for Green Belts which does not necessarily relate to the purpose for designation. A review of the policy wording is recommended and could, for example, simply state that "Inappropriate development will not be permitted unless justified by very special circumstances." EHDP already contains Policy CFLR2 which specifically addresses development within LGS.

46. The landowners of each LGS should be notified of the proposed designation.<sup>18</sup> Figures 16 to 18 identify LGS sites 1-16 but LGS site 17 is not supported by a map (or evidence) showing its area which should be remedied.



<p>47. NP paragraph 8.19 asserts that the agricultural land of the area should be protected from development in the interest of the local farming infrastructure and its future viability and cites NPPF paragraph 174 in support. NPPF paragraph 174 is now paragraph 179. It is unclear what is meant by 'the local farming infrastructure and future viability'. What does this consist of and with regard to what evidence? This should be explained or amended/omitted.</p>	
<p><sup>15</sup> NPPF Paragraph 105.  <sup>16</sup> NPPF, Paragraph 107.  <sup>17</sup> <a href="https://neighbourhoodplanning.org/toolkits-and-guidance/making-local-green-space-designations-neighbourhood-plan/">https://neighbourhoodplanning.org/toolkits-and-guidance/making-local-green-space-designations-neighbourhood-plan/</a>  <sup>18</sup> See PPG Reference ID: 37-019-20140306 (and more generally, PPG Reference IDs: 37-005-20140306 to 37-022-20140306).</p>	
<p>48. Policy SASM NE2 relates to nature conservation. The first criterion should be qualified as not all forms of development will be required to secure biodiversity net gains of at least 10%. For example: "Development proposals must conserve and enhance biodiversity and, <i>where applicable</i>, deliver net biodiversity gains of at least 10% (in accordance with the current best practice DEFRA Biodiversity Metric)." Criterion II effectively repeats the provisions of EHDP Policy NE2 and should be omitted.</p>	<p>Discussed with EHDC acknowledged BNG is an emerging area of policy. Text changed to include "where applicable"</p>
<p>49. NP Policy SASM NE3 relates to valued hedgerows and trees. It would aid the precision of the policy if the five valued hedgerows were shown on a map alongside a cross reference to evidence which explains why the identified hedgerows are deemed to be of value (species, appearance, history etc). Without evidence the policy is at risk of being considered arbitrary. Criterion III would benefit from the addition of "The <i>proposed</i> removal of unprotected trees..." to ensure that control can be exercised at the appropriate stage of the development management process.</p>	<p>Text amended to include justification</p>
<p>50. NP Policy SASM NE4 should be reviewed against the content of the EHDP and Policy WAT1 to avoid undue repetition. It is not clear from the supporting text what a Flood Risk and Water Management Plan would actually consist of, and this should be explained to ensure that the policy can be effectively and consistently implemented; the EHDP already requires a Flood Risk Assessment for some major developments. The reasoning for an undeveloped buffer of at least 5m from the tops of water course banks should be explained in the supporting text with reference to evidence, where available. Without this the 5m figure may not be justified.</p>	<p>take out NE41.</p>
<p><b>Leisure and Community Facilities Pages 54 - 57</b></p>	
<p>51. The NP area has a range of community facilities. Policy SASM CL1 supports the extension or relocation of such facilities and needs to be read alongside EHDP Policy CFLR8. Neither policy specifically addresses the circumstance of economic viability (or unviability) which may be particularly applicable to those facilities operated on a commercial basis. This matter could be considered for inclusion to ensure a flexible and effective policy. Nevertheless, and on balance, the policy is reasonable.</p>	
<p>52. Policy SASM CL2 addresses the provision of new leisure facilities. Criterion I is unnecessary as these matters are addressed by Building Regulations. Criterion II should be supported by explanatory text which explains what a 'suitable' location would mean in practice? Without such detail the policy is at risk of being ineffective.</p>	<p>take out criterion I</p>
<p>53. Policy SASM CL3 refers to 'new facilities' such as allotments, tourist accommodation and cultural facilities. Whilst the policy states that there is an identified need for such facilities, the foregoing text does not explain with any cross reference to specific evidence how such a need has been identified. This should be resolved to ensure that the policy is reasonable and justified.</p>	<p>this is in the evidence base for Business - bring into the main part of the policy here</p>
<p><b>Business and Employment Pages 57 – 63</b></p>	



<p>54. Stanstead Abbotts is described as relatively affluent with excellent public transport links and a wide range of businesses. Local Employment Areas are identified in NP Policy SASM B1 wherein employment related development is supported and non-business uses resisted. Whilst the evidence base underpinning the NP is limited in these regards, there is no indication that such an approach is unreasonable or unwarranted.</p>	
<p>55. NP Policy SASM B2 supports a mix of uses in the High Street. The policy is positively worded albeit criteria IV and V repeat policies elsewhere in the plan (HA1, HA2, CL1) and should be omitted.</p>	omit
<p>56. NP Policy SASM B3 is aspirational in its aims for super-fast broadband provision in new residential and business premises. The policy repeats EHDP Policy DES4(d) and therefore could be omitted to avoid duplication.</p>	
<p>57. Policy SASM B4 relates to farm and tourism related businesses. The policy should be reviewed against the EHDP and Policies ED2 and CFLR5 to avoid repetition which will likely render criteria I and II unnecessary. Criterion I refers to 'vitality' which possibly should be 'viability'.</p>	
<p>58. Policy SASM B5 addresses the design of business development but should also be reviewed against the EHDP Policies ED1 and ED4 which likely render criterion I unnecessary. Criterion II would be addressed by Building Regulations. Consequently, the policy could be omitted to avoid repetition.</p>	
<p><b>Transport Pages 63 -66</b></p>	
<p>59. The NP contains three transport related policies. SASM TR1 supports development where amenities in the village can be readily and safely accessed by pedestrians and cyclists. It is unclear what is meant by the term 'readily and safely' which should therefore be omitted or explained to ensure the policy can be implemented effectively. The policy addresses public rights of way but, in its content, appears to dilute the provisions of EHDP Policy CFLR3 by enabling the loss of such routes. This element of the NP should be reviewed and amended as necessary, feasibly in liaison with officers of EHDC.</p>	rights of way - flip to say development proposals should avoid the loss of public rights of way.
<p>60. NP Policy SASM TR2 requires major development to be supported by a proportionate Traffic Impact Assessment and to avoid unacceptable increases in traffic movements/volume. National policy states clearly that: "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."<sup>19</sup> Consequently, the necessity for including policy SASM TR2 could be reviewed. In any event, the reference to (and meaning of) Traffic Impact Assessments should be explained and amended (e.g. Transport Statement and Transport Assessment as defined in the NPPF glossary).</p>	
<p>61. Policy SASM TR3 relates to parking standards. The blanket policy requirement for adherence to a parking standard in excess of EHDC guidance is not justified particularly in the context of EHDP Policy TRA3 which states that vehicle parking provision will be assessed on a site-specific basis. The policy should be amended to refer solely to the District Council's guidelines.</p>	amend as suggested
<p><b>Implementation Page 67</b></p>	
<p>62. Policy SASM IM1 clarifies the spending priorities for the NP area. Criterion III should be omitted as development proposals can only legally be required to mitigate the effects of new development in line with the NPPF<sup>20</sup> and not to provide 'benefits' elsewhere, which would be unlawful.</p>	IM 1 spending priorities to focus on NP area.
<p><sup>19</sup> NPPF, Paragraph 117.</p>	
<p><sup>20</sup> Paragraphs 55-58 <a href="https://www.gov.uk/guidance/national-planning-policy-framework/4-decision-making">https://www.gov.uk/guidance/national-planning-policy-framework/4-decision-making</a></p>	
<p><b>Other Matters - Monitoring and Review</b></p>	

63. It would be prudent for the NP to include a section on monitoring and review to ensure the effective implementation of the plan and in order to deliver the vision and ensure the objectives are met. It may be helpful to develop indicators to measure the success of the NP in applying the policies and in securing its objectives. A tabular approach could be developed to assist, perhaps drawing on the objectives within the plan, for example:

check with ehdc - monitoring to be undertaken by the Parish Councils

NP Policy	Vision/ Objectives	Indicators
Policy SASM CL1	Obj L – to improve existing community facilities	Schemes supported/not supported for new community facilities.
Etc.	Etc.	Etc.

64. The Locality advice on monitoring is relevant and also includes a suggested table to assist at Figure 7, page 24 of their guide:

A spreadsheet could be created to record:

- how much each policy is being used;
- issues that are being addressed effectively and consistently;
- issues not being addressed adequately by each policy

April				
Policy	Usage	Issues Addressed	Issues not addressed satisfactorily	Comments
Policy 1	2	Affordable provision within the development	Housing mix does not meet aspirations	Policy too vague on housing mix.
Policy 2	3			

Figure 7. Possible spreadsheet to monitor effectiveness of policies.

65. Effective monitoring of the way in which the NP is used will ensure that either the plan is known to be successful or that aspects may benefit from actions to review. EHDC officers may be able to advise further.

#### General

66. The main focus of this Report has been on undertaking an assessment of the NP, and in particular its policies, in its current draft form. Prior to the submission of the plan, the NP should be updated to accommodate any necessary amendments. A thorough proof-read and sense check should be made of the plan and its supporting documents (including the Basic Conditions Statement and Consultation Statement) prior to the submission stage. The NP itself should also be proof-read by an independent person to check for typographical and presentational errors, which are commendably few in number.

67. A list of all evidence sources for the NP should be compiled with links. These should be made available on the NP website.



68. Finally, it is recognised that the above comments will involve amendments to the NP and its evidence. However, the time and effort that has clearly been put into the NP to date is noteworthy. If it can be amended with regard to the above suggestions, then it will have an increased likelihood of ultimately being submitted for a successful examination.

# Appendix 26

Policy	Policy Name	Para	Page	Comment Summary	Action	Change Required	Ref Id	Consultee	Comments
		1.4	6	<p>States that 'the Neighbourhood Plan has been prepared having regard to the policies of the East Herts District Plan.'. It should be noted that the Plan should also have regard to the adopted Minerals and Waste Local Plan Documents, because these also form part of the Development Plan for the area. This should also be reflected at paragraph 1.6(iii). For reference, the adopted Minerals and Waste Local Plan documents are as follows:</p> <ul style="list-style-type: none"> <li>• Minerals Local Plan Review 2007</li> <li>• Waste Core Strategy and Development Management Policies Development Plan Document (DPD) 2012</li> <li>• Waste Site Allocations DPD 2014</li> </ul> <p>Whilst not part of the Development Plan for the area, regard should also be had to any relevant Supplementary Planning Documents (SPDs), both those adopted by the District Council, and those adopted by the County Council which are as follows:</p> <ul style="list-style-type: none"> <li>• Minerals Consultation Areas SPD</li> <li>• Employment Land Areas of Search SPD</li> </ul>	para change	Reference to adopted Minerals and Waste Plans document added to spatial context section		HCCMW	Reference to adopted Minerals and Waste Plan documents added to spatial context section
	Policy 5, Riverside		40	<p>WASTE - There is one operational waste site within the Neighbourhood Plan Area, Rye Meads Water Recycling Centre. This permanent waste facility is safeguarded under 'Policy 5: Safeguarding of Sites' of the adopted Waste Core Strategy and Development Management Policies DPD (2012), due to its important contribution to the strategic network of waste management provision in the county. The Council welcomes acknowledgement of this site within the draft Plan and the need (stated in draft Policy SASM H2 iii) to make the support for new dwellings contingent on the appropriate upgrade of this facility.</p>	policy change	SASM H2 iii no longer required number of homes is within EHDC adopted district plan		HCCMW	HRA confirms this is no longer a requirement as the number of homes is in line with the adopted District Plan.
	Fig.54		106	<p>MINERALS - It should be noted that the Neighbourhood Plan Area falls entirely within the 'Sand and Gravel Belt' as identified in the Minerals Local Plan 2002 - 2016 (adopted March 2007). The Sand and Gravel Belt is a geological area that spans across the southern part of the county and contains the most concentrated deposits of sand and gravel throughout Hertfordshire. British Geological Survey (BGS) data also identifies superficial sand/gravel deposits within the Neighbourhood Plan Area.</p> <p>The county council, as the Minerals Planning Authority, identifies the entirety of the Sand and Gravel Belt as a Mineral Safeguarding Area. Planning applications for non-minerals development, that are submitted to the District Council, may not be determined until the county council has been given the opportunity to comment on whether the proposals would unacceptably sterilise mineral resources</p> <p>Of the proposed housing allocations in the Draft Plan, site H3 Land to the east of Netherfield Lane looks like it may contain potential workable reserves. Whilst no borehole data exists for this site, a borehole does exist (TL315E84) roughly 20m from the site on the west side of Netherfield Lane, which indicates the presence of sand and gravel in the vicinity. Whilst the full prior extraction of any mineral on the site may not be viable, owing to the proximity to existing housing and other receptors, any subsequent planning application may be encouraged to investigate this further, with a view to exploring the opportunity to extract mineral, as development commences, on an opportunistic basis.</p>	noted			HCCMW	spatial context to include section on gravel/mineral extraction. Noted that any planning application will need to engage with HCC M&W
	Fig.54		106	<p>MINERALS CONT/D... As the Parish Council is aware, the Hertfordshire Draft Minerals and Waste Local Plan (July 2022) proposed to allocate a site (MAS01: The Briggens Estate) for mineral extraction. The majority of this site falls within the Neighbourhood Plan Area, and the western boundary of this site borders the Neighbourhood Plan's Settlement Boundary and Conservation Area and also adjoins the eastern boundary of designation LGS11. Should the Minerals and Waste Local Plan become adopted and a subsequent planning application for extraction on site MAS01 be approved, mineral extraction may take place in this area. Although extraction would be temporary in nature, and appropriate standoff buffers would be applied, the Parish should be made aware of the proximity of this proposed mineral allocation.</p>	para addition to Location and Topography			HCCMW	
	Objectives			<p>The Authority supports the vision and objectives for the Stanstead Abbots and St Margarets Neighbourhood and welcomes the emphasis placed on enhancing the natural environment, protecting local heritage and the neighbourhood's countryside setting whilst also seeking to improve existing community facilities for recreation and leisure and meet needs in terms of housing and employment opportunities.</p> <p>Stanstead Abbots and St Margarets are attractive villages located within and adjacent to the Regional Park and there is an important relationship to foster between the Park and the local communities. The proximity of the Regional Park, its landscape, open spaces, wildlife and range of walking/cycling routes offer a variety of leisure and recreational opportunities both locally and further afield which bring benefits to the health and well-being of the communities and the economy of the local area. Stanstead Abbots and St Margarets provides important facilities and services both for those visiting the Park, and for regular users.</p> <p>The Neighbourhood Plan is an important mechanism through which to identify joint objectives that will meet the requirements of both the SASMNP Steering Group and the Authority in terms of protecting the Regional Park, its green spaces, landscape character and wildlife whilst also supporting the delivery of PDF Area proposals.</p>	noted			LVRPA	



	Objectives		Lee Valley Regional Park and the Park Development Framework - It would be helpful therefore if the SASMNP included more detail about the Regional Park and made reference to the remit of the Authority and the Park Development Framework as it relates to the Neighbourhood Area, (the Area 8 Proposals 'The Upper Valley Rye Meads to Ware'). This detail could be included as part of the context to the designated Neighbourhood Plan area and in the supporting text to relevant policy topics such as the Natural Environment, Nature Conservation, Leisure and Tourism. Site Allocations in particular H3 'Land to the east of Netherfield Lane' should also include reference to the Regional Park and PDF where they are located within or adjacent to the Park. The Regional Park is a statutory designation of relevance within East Herts District and part of the policy context when considering the future of these sites. Officers would be willing to engage further with members of the Steering Group on this matter in due course if this would be helpful.	para and policy change	Added policy context paragraph to high level (intro regarding difficulty of allocating sites) and reference specifically in site policy for Netherfield Lane.		LVRPA	Members of NP group met with officers of LVRPA
SASM H3	Land east of Netherfield Lane/South of Roydon Road		The Authority notes the detailed evidence gathering undertaken, local engagement and assessment of options that underpins the housing allocations within the SASMNP. There is concern however that the site allocation H3 'Land to the East of Netherfield Lane' proposes a substantial residential development within the Regional Park and the Green Belt and that to accommodate this the SASMNP policy proposes removing site H3 from the Green Belt.  It is understood that the SASMNP is seeking to identify sufficient allocations for housing development to meet the 10% increase identified for Group 1 Villages by the EHDP. There is an added requirement to source sites of sufficient size to ensure provision for affordable housing to provide for local needs. Hence the allocation of H3 which combines an existing permitted development on a brownfield site with the open fields adjoining in order to provide an area of sufficient size for a range of housing provision including 40% affordable units.  However it is not clear whether the SASMNP has taken into account the Regional Park designation in applying this allocation, or the implications of the development in terms of the Regional Park, its landscape character and recreational role, and the PDF Proposals. The only reference sits within supporting text and this mentions the need to mitigate adverse impacts from development on the surrounding Lee Valley Park by preserving "as much of the existing hedgerow and treeline as possible".	noted			LVRPA	
SASM H3	Land east of Netherfield Lane/South of Roydon Road		It should be noted that East Herts District Plan policy is supportive of the Lee Valley Regional Park and the Park Development Framework (PDF), Policy CFLR51. In particular, the District Council seeks to support and work with the Park Authority and other stakeholders to deliver the PDF Area Proposals where these improve leisure and sporting opportunities for local communities, enhance access to open space and nature, and help expand educational, volunteering and health related activities. PDF Area proposals 8. A.1 seek the protection, restoration and enhancement of existing habitat potential throughout the area and promote joint working with other landowners to improve ecological connectivity, along the waterways and between key sites such as Stanstead Innings and land to the east, for example the Ryegate Farm area. Proposals also seek to maintain and improve pedestrian and cycle access between Rye Meads and Stanstead Innings and ensure provision for horse riders are maintained; this would be along Netherfield Lane.	para change	add word "bridleways"		LVRPA	
SASM H3	Land east of Netherfield Lane/South of Roydon Road	Landscape Strategy	Proposals aim to strengthen the strong rural character of this landscape character area (G1 River Terraces with Farmland) by retaining existing and encouraging the replanting of hedgerows, managing and extending the existing small wooded areas for their diversity so as to retain the wooded skyline to the valley floor.  Policy SASM H3 would result in built development intruding further into the largely rural valley sides which form an important part of the Park's landscape character and contribute to people's enjoyment of the rural valley landscape. As land rises to the east from Netherfield Lane, development is likely to feature prominently in views out towards the north and east. The woodland and vegetated boundaries along the field edges also have direct connectivity with the woodland and scrub habitat edge to Stanstead Innings and therefore have value in terms of the wider ecology of the area.  Development even if screened and well-designed will impact upon the wider Park area by reducing the connectivity of habitats, introducing light and noise pollution and increasing vehicular movements along Netherfield Lane, a route that is well used by pedestrians and cyclists and is a designated bridleway. Development is also likely to create an increase in visitor pressure on Stanstead Innings which would also be a concern as this area is functionally linked to the nearby Lee Valley SPA (Rye Meads) and provides habitat for Bittern, Gadwall and Shoveler noted in the SPA citation.  <b>The Authority would ask the SASMNP Steering Group to reconsider this designation in the light of the above concerns.</b>				LVRPA	look at LVRP policy relating to this site. Minimal impact on landscape character; no public enjoyment of field - not accessible to public. Not a designated vista towards north and east. Existing policies within nature conservation policies that would protect relevant habitat. There is no real connectivity of habitats at the moment because the field is surrounded by houses. Can add into policy H3 that scheme must enhance the connectivity of habitats to Stanstead Innings. Do not accept that this site would create any noticeable impact on Stanstead Innings (and surely should LVRP not be encouraging more visitors - see next para about Stanstead Innings being a popular visitor destination, particularly those who would come on foot?). This is not envisaged as a visitor designation. We will be seeking a meeting with LVRP to address their concerns.
SASM H4	Land south of South Street		H4 is noted, this is also land within the Regional Park (and owned by the Authority), although in this case it lies outside the Green Belt forming part of a developed site currently part of the Lee Valley Marina, Stanstead Abbots. The Authority acknowledges that the site also sits within the village settlement area and although within flood zone 2 may have potential for a small residential development.  There are a number of constraints in relation to a residential redevelopment of this site however and these have been identified on the site allocation pro-forma. In the past officers have identified the potential of this site for development, including residential, when considering the Marina operations and the Neighbourhood Plan reflects this process. However at this time the site allocation consists of land and buildings required for Marina operations and release of the site for redevelopment will be a matter for future consideration.	policy change	take site out of plan.		LVRPA	



SASM R1	Riverside Development		<p>The inclusion of policy for the riverside and water related environment is welcome. Policy SASM R1 'Riverside Development' highlights the many and competing demands placed upon the riverside especially when development is proposed alongside or adjacent to the river. It is difficult to achieve a balance between these competing demands and the pressures they bring. Policy R1 should consider the ecological significance of the river and waterside environment and how impacts from development and associated uses can be avoided or minimised. The riverside environment often acts as a wildlife corridor and connecting habitat between other waterbodies and habitats - it is a key habitat along the length of the Regional Park for example. Key factors that impact here are light pollution from waterside development, increased noise and disturbance across extended time periods, and increased traffic movements.</p> <p>As well as the river, waterbodies within the Regional Park area have importance for biodiversity both in relation to designated and local sites of importance for nature conservation and in terms of their role as a visitor attraction – the water bodies and associated open space at Stanstead Innings for example, provide a popular site where people can get close to nature and enjoy wildlife throughout the year and accommodate a local sailing club.</p>	para change (add para)	add to R1 iv		LVRPA	
SASM R2	Floating Structures		<p>R2 sets out guidance for moorings and floating structures to ensure these do not detract from the character and openness or views of the river and to ensure they do not interfere with recreational and commercial use of the river. Recreational moorings are supported in the Park and contribute to the visitor experience. Policy R2 criteria are endorsed; they provide a similar framework to that set out within the PDF Area Proposals. Proposal 8.A.2 'Visitors' identifies "opportunities for recreational visitor moorings and boating focal points to be developed at Ware and Stanstead Abbots. Recreational moorings and support facilities to be improved where the location, scale, design and landscaping does not adversely affect the amenity of the area. The development of linear residential moorings to be avoided." Permanent residential moorings are more appropriately located off line and outside the Park where provision for parking and other services can be included without detriment to the waterside environment its accessibility and visitor enjoyment of the wider Park.</p>	noted			LVRPA	
SASM HA1	Heritage Assets		<p>The detail and scope of the SASMNP section on Heritage Assets is welcomed. Rye House Gatehouse Scheduled Monument falls within the Neighbourhood Plan area and is identified as a heritage asset and this is supported. Area Proposals within the PDF seek to promote joint working with Historic England and other stakeholders to preserve and enhance the heritage value and interest of the Rye House Gatehouse its setting and moat. The objective to raise awareness and provide accessible information about the significance of heritage assets in the area (Objective F) should be carried through into policy. For example Policy SASM HA1 could include awareness raising as an additional process for development to embrace as part of proposals to assist in protecting and enhancing heritage assets. Consideration should also be given to the importance of the industrial heritage of the Navigation and the wider Lea Valley, a key feature of the Regional Park.</p> <p>The importance attributed in the SASMNP to views and vistas and their contribution to landscape character and the setting of heritage assets is to be welcomed. A number of those included are views across the Regional Park and along its boundaries. Two are identified looking along the River Lee Navigation upstream and downstream from the bridge over the Navigation in the High Street. The Authority would seek the inclusion of an additional view both out to and from the rural valley sides to the east. The Lee Valley Regional Park Landscape Strategy notes as a key characteristic for Landscape Character Area G1 'Ryegate Farm/Terbets Hill' the importance of "Long views from the valley slopes across open bodies of water and wetlands within the Lee Valley floor.." and also the importance of this area (which includes the landscape east of Netherfield Lane) as a rural backdrop and skyline in views from the floodplain.</p>	para 1 noted para 2 para change para 3 no change	in action plan which is appropriate place; para 3 - this is already dealt with elsewhere (District Plan)		LVRPA	
		Natural Environment	<p>The Authority endorses the SASMNP objectives which aim to protect the natural environment particularly the landscape character of the natural floodplain of the Lea Valley and the countryside setting of Stanstead Abbots &amp; St Margarets. This is the same landscape and natural environment that underpins the Regional Park where the biodiversity value of the landscape has been recognised through national and international designations as well as locally important designations. Policy to protect these designated sites is to be welcomed especially where this complements the Local Plan Policy.</p> <p>It is suggested that the SASMNP includes a plan mapping the various nature conservation sites given the significance of these designations and the value of Local Wildlife Sites such as Stanstead Innings.</p>	no change			LVRPA	dealt with elsewhere
SASM NE2	Nature Conservation		<p>Policy on Nature Conservation SASM NE2 is supported. Measures to deliver BNG as outlined in in the Policy should however also be informed by the Authority's BAP and the work of the Authority at Stanstead Innings. This is a good example of habitat creation and enhancement that serves both wildlife and people. The SASMNP should also consider how other areas of open space and water act as buffers or supporting habitat for the Lee Valley SPA/Ramsar site, and the interconnectivity of the landscape. This will help to inform BNG should off site provision be required and contributions sought for their future management. The PDF Area Proposals also identify a number of actions and projects in relation to biodiversity and habitat enhancement as well as measures to improve access to nature. These should be considered by the SASMNP Steering Group and supported where appropriate.</p>	para change			LVRPA	put in action plan that any offsite BNG contributions would be within NP area
SASM NE3	Valued Hedgerows and Trees		<p>Policy on valued hedgerows and trees is noted and supported (SASM NE3). The Lee Valley Regional Park Landscape Strategy has identified the importance of retaining existing hedgerows and encouraging the replanting of hedges along historic field boundaries using locally indigenous species. This is considered important in order to retain the function of areas of the Park to the east, which also form the eastern boundary of the Neighbourhood Plan area, as a rural backdrop and wooded skyline for the Park and wider Lea Valley. Landscape Proposals also suggest that the parkland history of land to the east of Netherfield Lane should be considered together with "opportunities to perpetuate the parkland character with specimen trees in new planting".</p> <p>Measures to protect and prevent the degradation of the flood plain are supported.</p>	noted			LVRPA	
SASM NE4	Environmental Impact of Flooding		<p>Policy SASM NE4 mentions the need for development to include an undeveloped buffer of 5 metres from the top of waterways banks, this should be at least 8 metres in order to meet EA requirements and provide ecological benefits.</p>	para change	change to 8m. Could affect Amwell Lane development [action - measure distance at Wilderness site]		LVRPA	
SASM B4	Farm and Tourism Related Business		<p>The Authority welcomes the policy support set out under Policy SASM B4 for the development of leisure and tourism related uses that will help deliver the PDF Area 8 Proposals. The specific reference to the Stanstead Marina and its role in supporting recreational use of the waterways is also welcomed.</p>	noted			LVRPA	



SASM CL4	New Facilities			The need for tourist accommodation within the area identified by the Neighbourhood Plan evidence gathering process is noted. Policy SASM CL4 New Facilities suggests the location of new tourism accommodation should be in the village and SASM B4 II refers to support for overnight stay accommodation in association with leisure uses and social and educational functions. Visitor accommodation is a matter that falls within the remit of the PDF and there may be scope in the future for visitor accommodation in the Regional Park within the wider area of the Neighbourhood Plan. The Regional Park currently includes a range of overnight accommodation from camp sites and lodges, a youth hostel and, as referenced in the SASMNP, hotel provision at Roydon Marina. Policy in the SASMNP should consider the benefits of widening the locational scope for the provision of new visitor accommodation. There could be scope for the Authority and the SASMNP Steering Group to explore this further with other relevant stakeholders in the future.	noted			LVRPA	
SASM B4	Farm and Tourism Related Business			The many walking and cycling routes within the northern section of the Regional Park offer opportunities for the SASMNP area and supporting text in the Leisure and Community Facilities section references that a number of walks are available with links through into the valley. PDF Proposals identify opportunities to improve footpath and cycleway links into the Park, for example along Marsh Lane and from St Margarets station and to promote circular routes linking to PRow outside the Park boundary. It would be appropriate for Policy SASM B4 to support proposals for improvements to footpaths and cycleways within the Regional Park, particularly at key entrance points into the Park at Marsh Lane and Netherfield Lane and to promote connections through onto the Lea Valley Walk and Lea Valley Pathway from St Margarets Station.	noted			LVRPA	not a matter for the NP
SASM TR1	Safe and Sustainable Transport			The Authority supports the policy emphasis on protecting the village from unacceptable increases in traffic volume and traffic movements through the village and the need to maintain the safety of pedestrians and cyclists. The safety of visitors to the Park should also be considered; they are likely to be moving on foot or bicycle along the High Street as well as crossing between the station and the Park's entrance points. It is important to ensure safe crossing points across the High Street particularly at key interfaces, for example where the riverside towpath connects with the High Street. Policy SASM T1 which seeks to protect PRow is supported.	noted			LVRPA	
		Implementation	73	The Authority notes that the Neighbourhood Plan will be primarily implemented through the determination of planning applications by the Council and that Plan policies provide criteria against which planning applications are assessed. Appendix J to the SASMNP includes a draft Action Plan which outlines some of the initial spending priorities identified by the community as a result of the Neighbourhood Plan process. The resource/cost implications of the priorities included in the Action Plan are largely unknown or awaiting further detail and the priorities are mainly focused on transport, community and heritage related actions.  There is scope to include other priorities, for example relating to the natural environment, particularly where there are concerns that development proposals are likely to impact on designated sites or locally important habitats and green/water spaces. Should future development impact negatively upon the Regional Park, the Authority is likely to request S106 contributions for any mitigation works required, in line with the PDF Area Proposals. It will therefore be useful to consider whether any of the PDF proposals support or could inform local spending priorities to secure improvements to the natural environment and accessibility of the Stanstead Abbots & St Margarets Neighbourhood area and Regional Park. This could be another matter for future discussion between the Authority and the SASM Neighbourhood Steering Group.  The Authority looks forward to engaging further with members of the SASM Steering Group on the matters raised above prior to the next stage of the Neighbourhood Plan process.	noted			LVRPA	more than happy to consider
				Following a review of the document we have identified the following NGET assets as falling within the Neighbourhood area boundary: Asset Description - 42M ROUTE TWR (017 - 078): 400Kv Overhead Transmission Line route: PELHAM - RYEHOUSE 1 A plan showing details of NGET's assets is attached to this letter. Please note that this plan is illustrative only. National Grid also provides information in relation to its assets at the website below.  • <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a>  Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if they are not already included:  Matt Verlander, Director nationalgrid.uk@avisonyoung.com Avison Young, Central Square South, Orchard Street, Newcastle upon Tyne NE1 3AZ  Ellie Laycock, Development Liaison Officer box.landandacquisitions@nationalgrid.com National Grid Electricity Transmission National Grid House, Warwick Technology Park Gallows Hill Warwick, CV34 6DA	noted			NGET	

			<p>NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.</p> <p>Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.</p> <p>NGET's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <a href="https://www.nationalgridet.com/document/130626/download">https://www.nationalgridet.com/document/130626/download</a></p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.</p>				NGET	
			<p>An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="https://www.nationalgas.com/land-and-assets/network-route-maps">https://www.nationalgas.com/land-and-assets/network-route-maps</a></li> </ul> <p>Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:</p> <p>Matt Verlander, Director nationalgas.uk@avisonyoung.com Avison Young Central Square South Orchard Street Newcastle upon Tyne NE1 3AZ</p> <p>Kam Liddar, Asset Protection Lead National Gas Transmission National Grid House Warwick Technology Park Gallows Hill Warwick, CV34 6DA</p>	Noted			NGAS	
	Transport	70	<p>In relation to the Stanstead Abbots &amp; St Margarets Neighbourhood Plan, our principal interest is in safeguarding the operation of the M11 motorway (approximately 9km east) and the A1 (M) motorway (approximately 13.5km west) of the Stanstead Abbots &amp; St Margarets Neighbourhood Plan area respectively.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Stanstead Abbots &amp; St Margarets is required to be in conformity with East Herts Local Plan 2019 - 2033, the Town &amp; Country Planning Act 1990, the Planning &amp; Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Development Planning Regulations 2012. Page 2 of 2 We understand the future plan for the area is the potential to build at least 94 new homes over the plan period (in line with Policy SASM H2 Housing Numbers). National Highways would expect to be consulted as and when these applications come forward in the usual way to confirm each application will be assessed by standard procedure in relation to their expected distribution and impact on the SRN.</p> <p>Having reviewed the draft version of the Neighbourhood Plan, we note that the scale of growth remains low. The plan reinforces this by stating that the overall size of the village boundary will remain the same by 2033. Any potential impacts will be assessed accordingly. National Highways therefore consider the limited level of growth proposed across the Stanstead Abbots &amp; St Margarets Neighbourhood Plan area, will not have a significant impact on the operation of the SRN.</p> <p>We have no further comments to provide and trust the above is useful in the progression of the Stanstead Abbots &amp; St Margarets Neighbourhood Plan.</p>	noted			NH	very much noted!



		General Comments	<p>East Herts Council welcomes the opportunity to comment on the emerging Stanstead Abbots and St Margarets Neighbourhood Plan and is broadly very supportive of the emerging Neighbourhood Plan. The Parish Council and the Neighbourhood Plan Group are commended on their hard work to date.</p> <p>The Stanstead Abbots and St Margarets Neighbourhood Plan presents a positive planning document that seeks to shape development and is responding to the strategic priorities in the development plan in a pragmatic way. It is recognised that the neighbourhood plan area has significant constraints, providing a challenging context for the Neighbourhood Plan Group. The Council consider the plan is generally very well-written, well-evidenced and the policies are locally specific. The Council particularly supports the proactive approach taken to analyse, protect and enhance local character.</p> <p>Some further work is still necessary to review the draft to ensure the NP is in conformity with the District Plan (2018), and compliant with the National Planning Policy Framework (NPPF) and the other Basic Conditions, particularly in the following areas:</p> <ul style="list-style-type: none"> <li>-Clarity is needed around the housing strategy and how the Neighbourhood Plan will meet the housing need.</li> <li>-Housing allocations need more clarity and evidence to ensure they are both suitable for housing and deliverable during the plan period.</li> <li>-More evidence/ explanation is needed to demonstrate compliance with national policy in relation to flood risk.</li> <li>-The deliverability and effectiveness of some of the policies need to be reviewed, to ensure they meet the basic conditions and provide the decision-maker with a clear framework in which to operate.</li> </ul> <p>Once work has been undertaken to review the document following receipt of comments through this consultation, East Herts officer's welcome the opportunity to talk to the Neighbourhood Plan Group and work through any issues or modifications subsequently prepared particularly in relation to the comments below.</p> <p>It should also be noted that there is a legal requirement for public bodies to ensure documents on their website meet accessibility requirements. Therefore, in order for East Herts Council to publicise the submitted plan as part of the regulation 16 consultation it will need to be accessible, as explained in national guidance: <a href="https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps">https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps</a>.</p>	noted			EHDC	
		General Comments	<p>The Council welcomes the opportunity to comment on the development of this Neighbourhood Plan and commends the Parish Council on a well-evidenced and positive document, with locally-specific and concise policies.</p> <p>As you are no doubt aware, the Government is currently consulting on revisions to the National Planning Policy Framework (NPPF), with the intention to publish changes by spring 2023. As such it will be important to update the NPPF paragraph references in the submission version of the Neighbourhood Plan, as required.</p>	paragraph change			EHDC	
		1.4	6 Refers to the NPPF 2019, but the latest version is currently 2021.				EHDC	
SASM H1	Village and Green Belt Boundary		<p>The Council supports the principle of reviewing the Green Belt boundary. District Plan Policy VILL1 justifies the exceptional circumstances for amending the Green Belt boundary at Stanstead Abbots and St Margarets to accommodate the district's housing strategy. As outlined in paragraph 3.8, the NPPF enables Neighbourhood Plans to review Green Belt boundaries. Therefore, the Council welcomes Criteria I of this policy.</p> <p>However, it is suggested that Criteria II of the policy is deleted. It outlines that appropriate development in the Green Belt will only be permitted where it does not result in physical or visual coalescence or undermine the separate character, appearance and identity of Stanstead Abbots &amp; St Margarets. This approach essentially sets out additional restrictions to proposals for 'appropriate' development to that outlined in the National Planning Policy Framework. This approach is not in conformity with District Plan Policy GBRI Green Belt, which states that planning applications in the Green Belt should be considered in line with the provisions of the NPPF.</p> <p>If there is concern that the existing national and district planning policy does not sufficiently protect the separate character, appearance and identity of Stanstead Abbots and St Margarets, then it is suggested that policies relating to design or landscape are used to address this instead. The Council will be happy to advise on the development of such policies.</p>	delete Criteria II			EHDC	Members of NP group met with officers of EHDC
		3.11	16/17 The second sentence of this paragraph does not make sense and needs amending or deleting: 'To preserve the integrity of the Green Belt boundary as much a site large enough to provide the remainder of the allocation for the neighbourhood plan'	paragraph change			EHDC	full Green Belt policy needs to go into appendices
SASM H2	Housing Numbers		<p>19 The Council recognises the constraints in the neighbourhood plan area and commends the extensive and evidenced site selection process.</p> <p>The housing strategy would benefit from a number of additions and changes in order to improve clarity of the proposed strategy to meeting the housing requirement and ensure the deliverability of the proposed strategy is fully demonstrated.</p> <p>Firstly, more clarity is needed about the deliverability of some the allocated sites and the housing numbers they can accommodate in light of the identified constraints. Specific comments are identified in relation to relevant site allocations below. The housing figures in this policy (and the site specific policies) should be expressed as 'at least xx homes', rather than 'up to x homes', to provide more certainty about housing delivery and conformity with the District Plan housing requirement for Stanstead Abbots and St Margarets.</p> <p>Secondly, criterion e) refers to 8 homes with planning permission in Policy SASM H8 (site 28). Policy SASM H8 refers to 6 homes with planning permission. Clarity is needed about the correct figure.</p> <p>Thirdly, criterion g) refers to 15 homes that have been completed since April 2017. It would be helpful to include details (perhaps in an appendix) of the relevant planning application references and dwelling numbers for each site to provide clarity on where the completions have occurred and contributed to the housing supply.</p>				EHDC	



SASM H3	Land east of Netherfield Lane/South of Roydon Road	19-22	<p>As outlined above, District Plan Policy VIII.1 justifies the exceptional circumstances for amending the Green Belt boundary at Stanstead Abbots and St Margarets to accommodate the district's housing strategy. It is clear from Appendix C that the Neighbourhood Plan Group has undertaken an extensive site selection process that demonstrates the housing requirement of a minimum of 94 dwellings cannot be accommodated within the existing settlement boundary.</p> <p>The policy provides a good framework for the development. The Council has a number of comments about the policy criteria:</p> <p>II. The policy encourages the provision of First Homes. The Council has recently approved a First Homes Policy Statement: Issue - items at meetings - First Homes – Adoption of a Technical Guidance Note - East Herts District Council. Accordingly, the Housing Services team have advised that East Herts Council does not consider First Homes to be a suitable for affordable housing delivery in the district and will not seek the inclusion of First Homes in new developments. By supporting the delivery of First Homes, the Neighbourhood Plan conflicts with the Council's approach to affordable housing.</p> <p>The First Homes Policy Statement sets the First Homes discount at 30% in circumstances where the developer proposes to deliver First Homes, (the council will accept First Homes where the developer wants to include them in the affordable housing contribution and is not open to the provision of shared ownership; the council will not proactively seek the inclusion of First Homes). First Homes discount, once set, applies uniformly across the whole District and to all property types and sizes.</p> <p>Paragraph 3.34 of the document states that a new build 2 bed homes require a discount of 37.5% to bring the price down to £250,00 which is the price cap for First Homes. Nevertheless, it is proposed in paragraph 3.36 that the minimum discount of 30% is applied as anything more may impact on viability. However, the developer will not achieve a sale price of more than £250,000 as this is the maximum price that can be charged for First Homes. Consequently, at a market value of £400,000 a 30% discount will have the same impact on viability as a 37.5% discount.</p> <p>Additionally, a discount that doesn't achieve a sale price of £250,000 or less can result in a significant cash benefit for the first buyer as the £250,000 price cap only applies to the first sale. For instance, a property with a market price of £400,000 with a discount of 30% applied, equals a sale price of £280,000. However, the price cap applies so it is sold for £250,000. When the property is sold the 30% discount will apply, but there will not be a price cap. If the market value of the property remains £400,000, the sale price will be £280,000 meaning the first buyer will achieve a profit of £30,000 without the value of the property increasing.</p>	delete policy on First Homes; agree change to III as proposed		EHDC	
SASM H3	Land east of Netherfield Lane/South of Roydon Road	19-22	<p>To ensure the policy is deliverable it should reflect the Council's approach to affordable housing delivery. Therefore, reference to First Homes should be deleted.</p> <p>III. This criteria could be more positively worded. The first sentence provides little value for the decision-maker and although clearly not the intention, the wording implies green space is an 'add on' after the housing and related infrastructure' is delivered. It would also be helpful to refer specifically to the Green Belt boundary instead of the settlement boundary. It is suggested the wording is revised as below, or similar:</p> <p>There should be no greater land-take of greenfield land than is necessary to deliver the development. Any part of the greenfield area of the site that is not required for housing or related infrastructure The development should provide high quality, accessible green infrastructure including a permanent defensible landscaped boundary to contain the settlement edge define the new Green Belt boundary.</p> <p>IV. Reference to the Masterplanning and Design Guidelines is welcomed. It provides useful context and design context to inform the site allocation. However it is unclear if the document is part of the evidence base that informs the policy or if it includes additional design guidelines that need to be considered. If the latter is the case, it is suggested for clarity that the criteria clearly states that the Masterplanning and Design Guidelines should be taken into account. Alternatively, the relevant site-specific criteria should refer to the Guidelines where necessary.</p> <p>IV:</p> <p>(a) This criterion states, Housing mix should reflect local need, with predominantly 3/4-bed homes for open market sale and smaller 1, 2 and 3 bed affordable homes. It appears that the policy seeks to deliver a housing mix specific to the needs of the village. The implication is that the affordable dwellings will be allocated to households with a connection to the village.</p>	remove FH policy		EHDC	

SASM H3	Land east of Netherfield Lane/South of Roydon Road		<p>The District Plan includes a policy (HOU4) that allows for the development of affordable housing outside the village boundary to exclusively meet an evidenced housing need of the village. Such a development will be subject to a local letting policy which gives preference to households with a local connection. However, it is not proposed that this development is justified in terms of being a rural exception site. The dwellings on this site are intended to meet the District Plan housing target for Stanstead Abbots and St Margarets which forms part of the overall housing target for the District and is not specific to the needs of the village. There is a need for a mix of property types as set out in Table 14.2 of the District Plan to meet district wide needs. The council will negotiate the housing mix on a site-by-site basis considering factors such as the location of the development and what has been or will be delivered on other sites. Given that the development is to meet district wide needs, households with a connection to the village will not be awarded preference over other households on the housing register with a greater housing need. Affordable dwellings for rent delivered on the site will be allocated according to the council's Housing Register and Allocations Policy.</p> <p>b) This criteria states that '40% affordable housing will be required on land outside the site with permission (3/20/0502/OUT) plus land for a 6-unit housing scheme made available to the Baesh Trust'. It is understood from this statement that the community led housing scheme will not form part of the affordable housing contribution. However, the policy should not specifically require 40% affordable housing on land outside the site with permission. The site allocation refers to the whole site. Whilst the existing permission (3/20/0502/OUT) does not include affordable housing due to remediation costs, once this site has been allocated and removed from the Green Belt, the applicant could submit a new planning application for the whole site. The viability considerations of the whole site would be different to the permitted site, therefore the requirement for affordable homes could be different. This would be determined at planning application stage, but to ensure conformity with District Plan Policy HOU3 Affordable Housing, reference to 40% affordable housing on part of the site should be removed.</p> <p>f) Given the landscape and biodiversity benefits, the Council supports the retention of existing trees and hedgerows on the site. However, given the size of the wooded area on the site are the Parish Council confident that the capacity 60 dwellings is deliverable? It is noted that the Masterplanning and Design Guidelines (2021) indicate 89 homes can be accommodated and that the SEA states the capacity on the site has been reduced to mitigate the impact on heritage assets; presumably this also takes into account the retention of the wooded area? This evidence is positive but as the site is central to the NP housing strategy, it is important that the Parish Council can fully justify the estimated capacity.</p> <p>i) The Plan states 'Design concepts must be sympathetic to the setting of the grade I and II historic buildings close to the site and protected views through the sites.' – this should be amended to say Grade II* and II listed buildings – or simply say "...sympathetic to the setting of Listed Buildings close to the site.</p> <p>It is noted the table on p22 details the current/previous use as B1 (a), B2, B8. For clarity, the use classes need updating to reflect the changes in 2020 and reference to the</p>	b) para change as suggested		EHDC	
SASM H4	Land south of South Street	23-24	<p>The policy does not prescribe the number of dwellings that should be provided on this site and give certainty of their delivery and contribution to the overall housing strategy. Recommend the addition of a criteria to address this.</p> <p>Given the constraints on SASM H4, the Council is concerned that 9 dwellings may not be deliverable. It is recognised that the capacity of 9 was identified in the Masterplanning and Design Guidelines (2021), but this was on a larger site of 0.89ha that included Green Belt land. The allocation SASM H4 is identified as 0.3 ha on p23 and is the northern, brownfield part of the site, within the village settlement boundary. Criterion II acknowledges 'constraints on the site may however limit the number of homes achievable'. It is suggested that this wording is deleted because it does not relate to the land use of the site, but suggests uncertainty about the deliverability of 9 homes. The Council suggests that the potential capacity of the site is clarified.</p> <p>Criterion j) identifies a need for a landscape buffer given the pylon to the west of the site. This is supported, but will clearly reduce the developable area. The other major constraint is flood risk, which is not referenced in the policy. The site is flood zone 2 and 3 (a), so a flood risk assessment will be required at the planning application stage.</p> <p>In relation to flood risk, paragraph 161 of the National Planning Policy Framework (NPPF) states that all plans should apply a sequential, risk-based approach to the location of development by applying the sequential test and then, if necessary the exception test. Further guidance is provided in the Planning Practice Guidance (PPG) Flood Risk and Coastal Change -<a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a> (particularly paragraphs 15, 16 and 17 in relation to neighbourhood planning). The site assessment process (explained in appendix c) and the Strategic Environmental Assessment demonstrates that the assessment of flood risk has informed the development strategy. However, as a number of the allocated sites within the settlement boundary fall within flood zone 2 and 3, it should be clearly demonstrated that the sequential test (and where relevant the exception test) has been applied to demonstrate that alternative sites with lower flood risk are not available. If the allocations pass the sequential and the exception test (if relevant) it is suggested that the Parish Council should consider the following issues to ensure the Neighbourhood Plan meets the basic conditions:</p> <ul style="list-style-type: none"> <li>• That the site capacity reflects the flooding constraint, for example reducing the developable area to avoid the area of worse flood risk.</li> <li>• That any flood mitigation will not compromise the deliverability of the site.</li> <li>• The policy could incorporate a policy criteria about reference to flood mitigation.</li> </ul>	policy change	site removed	EHDC	



SASM H5	Land west of Amwell Lane	25	<p>This site is greenfield land within the settlement boundary identified for up to 8 dwellings. The number of dwellings this site can accommodate should be included as a policy criteria.</p> <p>Given that flooding is also a significant constraint on this site (flood zone 2 and 3, but with some flood defences) the flood risk comments raised above in response to Policy SASM H4 should be taken into account for this site too.</p> <p>It is also noted that the Masterplanning and Design Guidelines (2021) estimate the site is suitable for 6-8 dwellings. Given the need to ensure the housing strategy is achievable, would it be more realistic to state the site can accommodate 'at least 6 dwellings', instead of 'up to 8'.</p> <p>Generally, the policy includes a good range of criteria to effectively inform the development of the site. Criterion g) relates to drainage solutions. To ensure clarity for decision-makers it is suggested the phrase 'some form of' is deleted as follows: 'It is expected that some form of additional water management features will be required along with permeable paving'. In accordance with the Masterplanning and Design Guidelines it would be helpful to state this should be in the southern part of the site.</p>	para change - at least 6 dwellings; para change to suggested re drainage/water management			EHDC	
SASM H6	Chapelfields and Abbots Way Garages	27-28	<p>The number of dwellings this site can accommodate should be included as a policy criteria.</p> <p>The Council commends the policy criteria, but criterion II could be amended. It identifies topography as a constraint. Instead of this statement, it would be more helpful to include a more positive policy criterion which aims to ensure that the design and layout responds effectively to the topography.</p>	para change - at least 7 dwellings			EHDC	
SASM H7	Land east of Amwell Lane	26 & 27	<p>The number of dwellings this site can accommodate should be included as a policy criteria.</p> <p>Given that flooding is also a significant constraint on this site (flood zone 2 and 3) the flood risk comments raised above in response to Policy SASM H4 should be taken into account for this site too.</p> <p>In addition to the flood risk, it is understood that the site contains high pressure sewers connecting to the pumping station, which could restrict development. Is the Parish Council sure redevelopment of the site can overcome these constraints?</p> <p>Criterion II notes that a wildlife site covers part of the site, this relates to a protected species. Before submission of the plan feedback from Herts and Middlesex Wildlife should be sought to clarify the impact of development on the protected species. If impact can be mitigated, measures should be identified in the policy.</p> <p>Criteria III c) and e) need additional clarification. What does 'room for deliveries' mean in practice and likewise it is unclear what 'clearance for the operation of the pumping station' means</p>				EHDC	
SASM H8	Sites with planning permission	31	<p>There is only one site with planning permission so Policy SASM H8 should relate to the site in question: Policy SASM H8 Hoddesdon Road.</p> <p>Given that construction of the 6 homes is already underway, it seems unlikely this will not be completed. However, if this is not the case when the submission version of the neighbourhood plan is drafted, the Council support the retention of this policy for Hoddesdon Road.</p>	para change to reflect current status of site?			EHDC	
SASM H11	First Homes	32 and 33	<p>Bullet points I, II &amp; III – See comment above in response to SASM H3, the Council will not seek the inclusion of First Homes in new development.</p> <p>Bullet point V- The criterion seeks to impose local connection criteria to First Homes which give preference to households with a connection to the village. As stated in response to SASM H3, the housing target for Stanstead Abbots and St Margarets in the District Plan forms part of the overall housing target for the District and is not specific to the needs of the village. In effect the Neighbourhood Plan seeks to restrict the occupation of affordable housing that forms part of the overall housing target for the District. This undermines the Council's ability to deliver the overall affordable housing target.</p> <p>In these circumstances, the local connection criteria should be consistent with the criteria applied for other low-cost home ownership homes in East Hertfordshire, principally shared ownership as set out in the council's First Homes Policy Statement. To ensure consistency with the Council's approach it is recommended this policy is deleted.</p>	para change	remove references to First Homes		EHDC	
SASM D1	Design of Development	37	<p>The Council commends the design approach, signposting the Masterplanning and Design Framework (2021), to ensure local character and context is considered.</p>				EHDC	
SASM HA1	Heritage Assets	43	<p>The policy title 'Heritage Assets' should be renamed "SASM HA1: Designated Heritage Assets" as it only deals with those heritage assets that are designated.</p> <p>Criterion II should be reworded as follows: 'Development proposals which affect all any designated heritage assets above ground (Listed Buildings, Scheduled Monuments and Registered Historic Parks and Gardens), and, or below ground, should preserve and enhance the significance of the assets and their settings'.</p>	para change	change in line with suggestions		EHDC	
SASM HA2	Non-Designated Heritage Assets (NHA)	44	<p>NHA6 Drinking Fountain, at front of village hall, Roydon Road – should this refer to the Parish Hall rather than village hall?</p> <p>On Page 88, Figure 34, for consistency, reference to "water trough" should refer to Drinking Fountain as per policy SASM HA2.</p>	para change			EHDC	



SASM HA4	Protected Views		46	The Council supports the protection of key views, but has some comments:  <ul style="list-style-type: none"> <li>•View 3- The title could be improved for clarity, for example 'Looking north-west to Maltings along Roydon Road (north of junction with Abbots Rise)'. This would also need to be changed in Figure 34.</li> <li>•View 5- The title could be improved for clarity, for example 'North-east and south-west along the Mill Stream from footbridge in Maltings Car Park' It is noted that figure 36 only shows the north-east view, but the Conservation Area Appraisal identifies the south-west view, so it would be better if the NP captured both.</li> <li>•View 6- is of the Church of St Andrew along Cappell Lane. A further view is identified in the Conservation Area Appraisal of the immediate view of the church from Cappell Lane. Perhaps this should also be included?</li> </ul>	para change	change in line with suggestions		EHDC	
SASM NE1	Local Green Space		49	The Council supports the policy approach and the designation of local green spaces. For clarity, it is suggested Appendix G includes the size of each LGS (in hectares) as this has been requested by examiners in recent neighbourhood plan examinations.  Criterion II- Reference to consistency with District Plan Policy CFLR2 should be deleted. The question of appropriate LGS policy is now subject to the guidance of the Court of Appeal in R (Lochailort) v Mendip DC (2020) EWCA Civ. 1259, to the effect that unless exceptional reasons are given, LGS policy should be consistent with NPPF policy.	para change	addition to Appendix G as suggested; reference to DP deleted		EHDC	
SASM CL2	Loss of Existing Facilities		61	The loss of community facilities is addressed by District Plan Policy CFLR8 and this policy appears to duplicate the policy approach and add no locally specific value, so consider deleting.	para change	delete reference to loss of facilities		EHDC	
SASM B1	Local Employment Areas		65-66	Paragraph 9.15 states that the Council has an Article 4 Direction to restrict permitted development rights in the employment sites. However, this is not the case as the Article 4 was not confirmed. As such development within the employment areas that falls within the remit of permitted development (even if it is not 'business uses') cannot be restricted by the planning system. In any case, it is considered that criteria I and II of SASM B1 duplicates District Plan Policy ED1 Employment so consider deleting.	para change	remove reference to Article 4		EHDC	
		Allocated Sites		Having reviewed the HRA submitted by AECOM we are in agreement with the conclusions drawn in this report. We have noted that the allocations listed below fall within the Impact Risk Zones for Rye Meads SSSI, Amwell Quarry SSSI, Hunsdon meads SSSI, and Wormley-Hoddesdon Park SSSI. If such sites are allocated it would require further consultation with Natural England to assess the likely impacts and the provision of mitigation measures if required. We also recommend rewording the sentence Proposals where a harmful impact is identified will only be permitted where effective mitigation measures can be delivered in box SASM Ha4 to include the phrase "Where all other alternative options have been reasonably discounted".	no change	In H2, add a line "any sites that fall within the Impact Risk Zones for the relevant SSSIs will require further consultation with Natural England".		NE	H4 is removed
SASM H3	Land east of Netherfield Lane/South of Roydon Road			The proposed site which lies on the outskirts of Stanstead abbots, makes up the bulk of the housing allocations (60 homes). While the site is already developed in places and partly brownfield, its allocation would result in changing the green belt boundary to accommodate the site. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.  The proposed site lies between three SSSIs; Amwell Quarry, Hunsdon meads, and Rye Meads SSSI, with accessible public rights of way to both Amwell Quarry. and Rye Meads. Rye Meads in particular is sensitive to recreational and water discharge pressures, lying downstream of the proposed site. In addition to this, the likely in-combination pressures from larger developments in the area are causing recreational, water quality, and air pollution issues for the Lea Valley SPA as a whole.  Sections of the site include green space and trees that are linking two areas of deciduous woodland containing priority habitat. Any future proposals should focus on existing hard surfaces/developed areas where possible and ensure that existing green corridors are not compromised and continue to provide connectivity to those priority habitats.  At 3.2 ha the site falls below the 20ha threshold for concern for impacts on best and most versatile land (BMV). As such, we have no immediate concerns. However, concerns would be raised if further future development was to result in accumulated loss of BMV land.	no change			NE	Further consultation with NE may be required as part of any planning application.
SASM H4	Land south of South Street			It is acknowledged that within the Neighbourhood Plan a statement is made regarding the flooding issues around this brownfield site. This could be of concern as the site is bordering a primary river to the south and a secondary river to the north that feeds into the River Lea. This water flow is directed towards Rye Meads SSSI, which is sensitive to water quality pressures and changes. The plan notes that this should be taken into account in any development, however we would like more detail on how pollutants during construction and operational phases are controlled.	policy change	site removed		NE	site is being removed from Plan
SASM H5	Land west of Amwell Lane			Currently a greenfield site which has issues with flooding in one corner. As such, hard surfacing would result in increased surface water runoff, which could result in water quality/quantity pressures for Rye Meads SSSI. We note the inclusion of a 5m green access zone along the western boundary to protect the embankment and river, as well as the recommendation for water management features and draining solutions. The Environment Agency, however, recommends a minimum of 8m from a flood defence or embankment. Natural England welcome further details on proposed solutions once these have been investigated.	no change			NE	This is more properly dealt with as part of planning application; any planning proposal would be expected to consult with NE
SASM H6	Chapelfields and Abbots Way Garages			Plans to retain trees on site and uplift the area with additional green infrastructure are welcomed. For further details on green infrastructure opportunities we refer you to Annex A.	no change			NE	



SASM H7	Land east of Amwell Lane		<p>It is acknowledged that the Steering Group has chosen another brownfield site within the village boundary, reflecting their intention to meet the housing quota without compromising the greenbelt. It is noted that the plan highlights a number of 'Mature trees' on this proposed site which will be retained alongside an undertaking of an ecological assessment in partnership with the Wildlife Trust.</p> <p>From aerial photography, it appears that there is more than one mature tree within the boundary of this site which could support biodiversity and good connective habitat to the woodland west of the site boundary. Therefore, Natural England would welcome this site being considered for nature recovery opportunities in the future.</p>	no change			NE	
		Air Pollution 7.20 - 7.24	<p>53 Natural England welcomes the inclusion of climate change within sections of the Neighbourhood plan and references to the East Herts Air Quality Action Plan, as well as a section dedicated to air pollution (section 7.20-7.24).</p> <p>The Neighbourhood plan should recognise the significant role of the natural environment in delivering measures to reduce the effects of climate change through mitigation and adaptation.</p> <p>Green Infrastructure and nature-based solutions play an important role in aiding climate change adaptation and reduction in urban air pollution, and these should be directly acknowledged within the housing design objectives of the Plan. We refer you to Natural England's Climate Change Adaptation Manual - NE751 (naturalengland.org.uk) for consideration.</p>	para change/addition	"In bringing forward sites within the scheme, consideration should be given to NE's Climate Change Adaptation Manual. Etc"		NE	
		Soil & Agriculture 7.14 - 7.19	<p>52 We welcome inclusion of the Soil and Agriculture section (7.14 – 7.19) and discussions of Agricultural Land Classifications for individual sites. Further from our comments on proposed allocated site 'Land to the east of Netherfield Lane' Natural England should be consulted if future development is expected to lead to a potential accumulated loss of BMV.</p>	no change			NE	
		Natural Environment	<p>49 It is noted in the most recent Stanstead Abbots &amp; St Margarets Neighbourhood Plan that the draft was completed with reference to Stanstead Abbots Neighbourhood Masterplanning and Design Guidelines (AECOM, 2021). It is also positive to see that consultation was undertaken with local residents and to identify green belt land, meadows and open access land, and other amenity green spaces/infrastructure across the neighbourhood.</p> <p>This is clearly referenced within the plan under the Natural Environment and Green Infrastructure section, where 'Cherished green spaces' are designated as Local Green Spaces (LGS), offering a greater level of protection and future enhancement. Within the Nature Conservation Section, specific reference is made to biodiversity enhancement through 'wildflower recovery areas', provision of bat boxes, and creation of new habitats of high value for wild birds. Natural England welcome this.</p> <p>We do, however, think that further Green Infrastructure opportunities can be incorporated into the Neighbourhood plan and we direct you to the Green Infrastructure Framework that was introduced alongside the government's Environmental Improvement Plan on 31st January 2023.</p> <p>Recommendations for additional green infrastructure are detailed in Annex A.</p> <p>We suggest the following GI additions for inclusion within the Neighbourhood plan :</p> <ul style="list-style-type: none"> <li>• Incorporation of Green Parking initiatives during housing development (Section 4.10).</li> <li>• Inclusion of GI designs such as green roofs, bird boxes, bee hotels etc in cycle parking development (Section 4.14).</li> <li>• Specific reference to lighting guidance for bats in addition to safe exterior lighting (Section 2.9).</li> <li>• Mention biodiversity benefits and GI initiatives in both private, communal and public outdoor amenity spaces during design and operational phases (Section 4.20).</li> </ul> <p>The "15 minute neighbourhood" concept is being encouraged as part of the new GI standards. This seeks to ensure that everyone has access to good quality natural greenspace within 15 minute's walking distance from their homes, in line with the Accessible Greenspace Standards and Green Flag Criteria. This has also been referenced within the Government's Environmental Improvement Plan. Natural England encourage the Neighbourhood Plan to consider a commitment aligned with this target.</p> <p>Defra recently announced the decision to make Sustainable Urban Drainage systems mandatory by 2024 in a review document of recommendations for the implementation of Schedule 3 to The Flood and Water Management Act 2010. The Neighbourhood plan should directly reference this decision and strongly encourage the use of SUDs where appropriate.</p> <p>We have provided some further advice and guidance relating to green infrastructure in Annex A of our submission</p>	para change	under SASM D1 Design of development, insert line J "consideration should be given to relevant Natural England requirements (e.g. the Green Infrastructure Framework)		NE	
SASM H5	Land west of Amwell Lane		<p>This site is owned by Thames Water and the proposed allocation is supported. Due to the proximity to the New River the design of development will need to retain ability to access across a 5m strip from the base of the embankment of the New River to provide access for any maintenance works that may be necessary in the future. In addition, the construction methodology for any development would need to be agreed with Thames Water in order to protect the structure of the New River.</p> <p>WATERS RESPONSE</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>WASTE RESPONSE</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Wastewater: No surface water flows should be discharged to the public sewer.</p>	no change			TW	



SASM H7	Land east of Amwell Lane			<p>This site contains an operational sewage pumping station and as such any application for development will need to demonstrate that suitable operational access to the pumping station will be retained and that occupiers of the new development will not be adversely affected by odour or noise in order to ensure that development is acceptable. It should be noted that the Thames Water is a sewage pumping station and is not connected with the New River as mentioned in Section 3.3. Sewers cross the site and any development will need to ensure that the existing assets are protected. Developers are advised to engage with Thames Water at an early stage to discuss any proposals for the site.</p> <p>WATERS RESPONSE On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Waste – There is a live pumping station and associated infrastructure on this land. It is recommended that the developer liaise with Thames Water at the earliest opportunity to discuss the proposed works.</p>	no change			TW	
SASM H6	Chapelfields and Abbotts Way Garages			<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Wastewater: These comments are based on the assumption that foul flows will be connected to the public sewer by gravity (not pumped) and that no surface water flows will be discharged to the public sewer.</p>	no change			TW	
SASM H3	Land east of Netherfield Lane/South of Roydon Road			<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Wastewater: These comments are based on the assumption that foul flows will be connected to the public sewer by gravity (not pumped) and that no surface water flows will be discharged to the foul public sewer.</p>	no change			TW	
SASM H4	Land south of South Street			<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Wastewater: These comments are based on the assumption that foul flows will be connected to the public sewer by gravity (not pumped) and that no surface water flows will be discharged to the public sewer.</p>	no change			TW	
		para 1.8	7	During this review process the Steering Group assessed sites in and around the village for potential housing sites. Paragraph 1.8 of the Reg 14 Plan highlights that the East Herts Strategic Land Availability Assessment was used as the starting point for site assessments. This District wide Assessment was undertaken by East Herts Council in 2017 and at the time the parcel of land to the north of the A414 was combined with the parcel of land to the south of the A414, with a total site area of 45.8 ha. The SLAA reference given to this combined site was 37/001.				CE	SLAA says: This is a greenfield site consisting of two large parcels of land separated by the A414 located within the Green Belt. The site forms part of the strategic gap between the settlements of Hoddesdon, Stanstead St Margarets and Great Amwell. As such the site is considered to be unsuitable. However, the smaller site as put forward was considered as part of our site assessment.
		para 1.8	8	The 2017 District wide SLAA therefore did not assess specifically the impact of the smaller site to the north of A414. This smaller site north of the A414 (identified by the attached location plan) was subsequently submitted as a potential site allocation for housing through the Neighbourhood Plan Call for Sites in March 2019.	noted			CE	the NP process is not intended to revisit the SLAA
		1.7 to 1.10		Attached to this submission is a site selection report prepared by Catesby in 2019. This undertook a review of the sites put forward through the District Council's 2017 SLAA specific to the Neighbourhood Area boundary	noted			CE	We cannot take into account a third party assessment from the promoter of one land parcel where there is a clear bias in favour of their own site
				In December 2020, an independent Site Options and Assessment Review was undertaken by AECOM, which was then used by the NP Steering Group to inform site selection for potential housing allocation sites	Noted			CE	The AECOM report was a review of our site selection methodology, not a site selection process in itself. We took their findings into account and re-ran the scoring following amendments. Again, refer to site selection narrative which explains this process in great deta



			The land to the north of the A414 and west of St Margaretsbury was identified as Site No. C2 in this independent report and referred to as land south of Station Road. Within the Ranking Table in Figure 3-2 of this document, based on gross site area at 30 dph, it assumed the development capacity of Site No. C2 was 300 No. dwellings and makes no reference to the additional public benefits proposed. This magnitude of development was therefore a significant over-estimate of the amount of development proposed for the site and skewed how the site was assessed and scored by the 2020 independent AECOM report. The AECOM report also made no clear explanation as to why the site was omitted for further consideration as a potential allocation within the Neighbourhood Plan. The 2019 site selection report prepared by Catesby therefore provides a more credible review and scoring of Site No. C2.	Noted			CE	Further information provided in relation to your site was assessed as part of the final reassessment (see SSN) p 79-80. Your site was included in this final reassessment
			Catesby therefore consider that the Regulation 14 Neighbourhood Plan fails the basic tests in that it is unclear how sites have been selected and/or omitted as potential allocations	noted			CE	see Appendix C Site Selection Narrative, which explains clearly how we developed our site selection methodology and the various iterations it went through. Site C2 was considered and assessed as part of this process.
		Paragraphs 1.11 and 1.12	Whilst the efforts of the NP Steering Group are noted, it is considered that in relation to Site No. C2, the local community has not been consulted or allowed to comment on the benefits that this scheme would bring to the village not only in relation to delivering housing in one site location, but also the additional recreational open spaces, community allotments and provision of a public car park that could be provided through this development. The allocation of Netherfield Road appears to be considered a foregone conclusion with no clear explanation provided as to why this is preferable to Site No. C2 and without any opportunity for the community to consider alternative proposals	no change			CE	The NP cannot take into consideration factors outside of the site assessment process; it should be noted that the site assessment process did take into account potential community infrastructure/benefits. However at no point has there been any requirement for an additional car park so this would not necessarily be viewed as a benefit within the NP. It should also be noted that earlier consultations (such as the resident survey) identified a strong preference on behalf of the community to have most of the housing provided on smaller sites rather than in one large site. The draft NP demonstrates that sites are distributed proportionally across the settlement
		para 2.3.	The Neighbourhood Plan sets out 18 No. objectives covering: Housing & Design; Riverside; Heritage; Natural Environment; Leisure & Community Facilities; Business and Employment; and, Transport. Objective A seeks to promote sustainable development that provides for the current and future needs of the community, which my client supports and which we believe the development at Site No.C2 would provide for the village. Objective J refers to maintaining irreplaceable species, promote ecosystem diversity and ensuring that development results in a net gain in biodiversity. It should be noted that in relation to Site No.C2 there is "on-site" land available and "off-site" land in close proximity to the site under the control of Catesby Estates that could provide in excess of the 10% biodiversity net gain.Ian sets out 18 No. objectives covering: Housing & Design; Riverside; Heritage; Natural Environment; Leisure & Community Facilities; Business and Employment; and, Transport.	no change			CE	It is unclear whether you are referring to additional land parcels that you would wish to bring forward in addition to the site proposals you put forward. Therefore biodiversity net gain would not be a standalone issue
			The proposed housing sites that have been selected in the Reg 14 version of the Neighbourhood Plan have sought to squeeze and cram housing into any available spaces in and around the village seek to fully develop the sites for housing, with no or very little informal open space that could provide biodiversity opportunities. We would therefore question whether the 10% biodiversity net gain can be achieved on-site for or in close proximity to these developments. On this basis, it is questioned whether the Reg 14 Neighbourhood Plan is deliverable in terms of the housing allocations meeting this objective and other relevant policies in the Plan.	no change			CE	The 10% biodiversity gain is an existing planning policy which any developer bringing a site forward would have to deliver. We have provided further guidance as part of SASM NE2 Nature Conservation. Again, residents specifically asked us to prioritise small brownfield sites within the village settlement boundary
			Objective L seeks to improve community, leisure & recreation facilities, and make these facilities accessible to everyone. Site No.C2 west of the village would deliver additional outdoor recreational facilities, allotments and provide public car parking in close proximity to the village's railway station and short walk to the High Street, easing the pressure for parking within the village. None of these planning gains will be provided by the other sites that have been proposed as housing allocations within the Reg 14 Neighbourhood Plan, and the Plan as it is currently drafted lacks initiatives or site specific policies to provide for the future community and recreational needs of the village.	Noted			CE	There is already good provision of leisure facilities within the village and the draft NP seeks to retain and improve these. This site is adjacent to an existing leisure facility which provides a good selection of activities and community uses. There has been no identified strategic need for an additional public car park to serve the village, particularly on Green Belt land.
		Paragraph 3.6	This paragraph highlights how the village is surrounded by Green Belt and a statement is made that to amend the Green Belt boundary and extend the village to accommodate land for housing, this has meant that any land released from the Green Belt needs to be adjacent to the village boundary. It should be noted that the proposed housing at Site No.C2 would be on the eastern side of the parcel of land and adjacent to the existing residential estate off Hillside Lane and village boundary on the northern side of Station Road (B181). The proposed housing at Site No.C2 would therefore comply with this Green Belt release requirements in that it is well contained to the south by the A414 and Station Road to the north, and does not project further west than the existing right of way that runs north east/south west through the centre of the overall site area.	noted			CE	This has been taken into account as part of the Green Belt policy. [NB full GB policy needs to be included as an appendix as this goes into detail about how we made our decision around the change to the Green Belt]



			It is also noted that the overall aim of the site selection focus shifted during the Neighbourhood Plan process. Rather than select one site that would meet most of the housing target and provide for housing needs of the village, the plan has sought to allocate several smaller sites within the village boundary. However, in selecting the sites shown in the Reg 14 version of the Neighbourhood Plan, this approach fails to acknowledge and promote the other objectives within the Plan, most notably in terms of the need for the selected sites to deliver at least 10% Biodiversity net gain, affordable housing and providing for the future recreational and community needs of the village				CE	see above and para 3.10 in NP
			It is notable that 5 out of the 6 proposed allocations are less than 11 dwellings and therefore will make no contribution to affordable housing needs. The overall amount of affordable housing provided through the Neighbourhood Plan by following its strategy will result in considerably less than the 40% policy requirement and significantly less than what could be delivered on a single site in a district where the housing price is over 12 times the average earnings.				CE	The draft NP is in conformity with EHDC's requirement for affordable homes. We were aware of this consideration when selecting sites and any developer coming forward will need to justify their approach to affordable housing as part of the planning application process.
		Paragraph 3.11 and Policy SASM H1	It is acknowledged that the protection of the Green Belt is one of the primary focuses of the Neighbourhood Plan and that in order to minimise the impact of openness, the NP Steering Group have focused on the delivery of one site that would need an amendment to the Green Belt and village boundary. The site that has been selected lies off Netherfield Lane/Roydon Road and whilst we acknowledge the need to draw a "new, strong and defensible boundary between the village and the Green Belt", the site that has been selected focuses more on delivering housing, rather than achieving the other community and affordable housing objectives set out within the Neighbourhood Plan. The result of this approach and Green Belt release through the Neighbourhood Plan will result in a missed opportunity to deliver additional substantial and meaningful improvements to recreational and community facilities to meet local community needs, and to deliver affordable homes for the village	no change			CE	Our rationale for site selection has been clearly identifiable throughout the process.
		Paragraph 3.19 and Policy SASM H3	. Paragraph 3.19 states that it will be "essential" to achieve 10% net gain in biodiversity on the land east of Netherfield Lane/south of Roydon Road (Site H3). However, it is noted that the same paragraph refers to some further land take surrounding the site will enable more extensive landscaping and creation of a "green barrier" between the site and houses proposed on Netherfield Lane. This statements indicates that the site allocation H3 will not be large enough in its own right to deliver the necessary planning requirements in terms of containing the site, creating a landscape buffer and potentially meeting the 10% biodiversity net gain. Further clarification is required as to whether the development at Site H3 and requirements of Policy SASM H3 can be delivered within the confines of the proposed site allocation boundary.	no change			CE	The draft NPlan seeks to provide further clarity to EHDC existing policy and has been set out within SASM H3. It will be for the LPA to consider the relative merits of any application that comes forward in light of those policies
			<i>comments on planning application for Netherfield Lane brownfield site</i>				CE	This application will be duly considered by the LPA. The purpose of the NPlan is to provide additional policy guidance to support any application coming forward within the lifetime of the plan. It is acknowledged that planning applications will be considered by the LPA throughout the duration of this process.
			Criteria IV. refers to design concepts must be sympathetic to the setting of the Grade I and II historic building close to the site and protected views through the sites. It however makes no mention of the adjoining Conservation Area to the north of the site and how its setting should be taken into account in considering development on Site H3	para change	Amend SASM H3 (i) to reflect this.		CE	
		Paragraph 3.25 and Policy SASM H4	It should be noted the land south of South Street is located within Flood Zone 2 and is known at times of heavy rainfall to flood along South Street. Whilst this is highlighted within paragraph 3.25, it is not specifically referred to in Policy SASM H4. It is however noted in Part I of the Policy SASM H4 that: "Constraints on the site may however limit the number of homes achievable.". There are also requirements of this site specific policy to meet Biodiversity net gain (this should read at least 10%); provide a green buffer along the western boundary; consider environmental impacts on the River Lea Navigation; and, provide space for deliveries and emergency access. With these constraints, along with the fundamental technical concerns of the flood risk of the site, robust evidence should be provided to demonstrate that the site allocation will deliver the estimated capacity of 9 units. Catesby question whether in reality it is a viable scheme to come forward for development	noted			CE	This will be taken into consideration as part of the responses to the consultation on the draft NP
		Policy SASM H5	This strip of land to the west of Amwell Lane has been identified for housing with an estimated capacity of 8 dwellings. Part II. of the Policy SASM H5 notes that the river and topographical constraints on site may limit the number of homes that can be achieved. This statement therefore clearly brings into question whether 8 No. dwellings will be delivered from this site. It is also notable that site is also located within Flood Zones 2 and 3, and also forms part of the characteristic embankment corridor along New River between St Margarets and Great Amwell. The development of this site would result in the loss a large section of this embankment and visual amenity along Amwell Lane and New River. Furthermore, we have considerable doubts that this scheme will deliver the biodiversity net gain requirements, taking into account its sensitive location next to New River.	noted			CE	In light of the consultation we are reviewing all comments and engaging with relevant stakeholders before finalizing the plan
		Policy SASM H6	It is noted that site allocation H6 falls within the ownership of Network Homes, and whilst they are a provider of affordable homes, there is no guarantee that they will build out this site. As the site is below the 10 unit threshold there is not a District Plan (or Neighbourhood Plan) policy requirement to provide 40% affordable housing. As such for the purposes of establishing the level of affordable housing to be delivered by the Neighbourhood Plan, unless it is specifically stated within Policy SASM H6 that it will deliver affordable housing, it cannot be accounted for in the numbers to be delivered by the Plan	noted			CE	This application will be duly considered by the LPA. The purpose of the N Plan is to provide additional policy guidance to support any application coming forward within the lifetime of the plan. It is acknowledged that planning applications will be considered by the LPA throughout the duration of this process
		Paragraph 3.30 and Policy SASM H7	It is considered by the Reg 14 Neighbourhood Plan that a site that is 0.22 hectares, along with its identified site constraints, will deliver potentially only 2 dwellings. Whilst this number could increase to 7 homes subject to removing a pumping station, the potential site constraints could limit the delivery of this site to 2 dwellings. It is therefore questioned the credibility of putting forward such a small development as a housing allocation and whether it is fact an efficient use of land. This site could legitimately come forward as a windfall site considered under other policies within the District Plan and Neighbourhood Plan and it is therefore questioned as to why it has been shown as a potential allocation site. It is also notable that along with being a pumping station, the site is also located Flood Zone	no change			CE	this site remains a potential allocation



	Paragraph 3.30 and Policy SASM H7	3. Whilst again this area benefits from flood defence measures, it brings into question whether sequentially this is a preferred site for development taking into account potential flood risk in the future.				CE	
	policy SASM H10	This policy aims to provide a mix of dwellings and tenures that meet local needs and appropriate to the location, which is admirable. It is noted that Part II. refers to welcoming one and two-bedroom flats, particularly close to public transport routes. In relation to Site No. C2 west of the village, it is worth noting that the site is located a short walk from the village centre and railway station, and has the opportunity and capacity to deliver one and two-bedroom flats meeting the aspirations of this policy.	noted			CE	
	Paragraph 5.3 and Policy SASM R1	Paragraph 5.3 refers to most residents living in sight of either the New River, the River Navigation, Mill Stream or the original River Lea itself. This paragraph states that development along these riversides should enhance all the benefits the river brings to the community whilst being sustainable and resilient to climate change. This guidance follows through to Policy SASM R1 and Criteria I. and II. This guidance and policy stance is supported, but it is questioned whether the proposed site allocation to the west of Amwell Lane (Policy SASM H5) will be able to comply with this policy. This site allocation will result in the loss of part of the intrinsic river bank character along this side of Amwell Road and due to the linear shape and size of the proposed allocation is likely to result in housing backing onto New River. The resultant development of this site would have the potential to be harmful to the character and appearance of this river corridor and contrary to this guidance and policy stance.	no change			CE	This site remains part of our site allocation. It should be noted that new developments along the New River have been permitted within recent years.
	Section 6 Heritage Assets and SASM HAA: Protect Views	This section of the Neighbourhood Plan provides guidance on developments that would have an impact on heritage assets and identified non-designated heritage assets. Policy SASM HAA4 also identifies twelve protected views within the village, with notable protected views 1 and 2 covering the site frontage of Site H3 at Netherfield Lane/south of Roydon Road.				CE	This view is not directly impacted by site development.
	Section 8 Leisure and Community Facilities	This section provides guidance in relation towards meeting the aspirations of the Neighbourhood Plans Objectives K, L and M. Whilst the policies within this section seek to protect, maintain and support leisure and community village facilities there is no review of current levels of leisure facilities and what is required by the village during the plan period 2017 to 2033	no change			CE	NP sets out clearly what existing facilities are. Section 8 and SASM CL4 sets out what type of community provision would be welcomed.
	Section 8 Leisure and Community Facilities	It is considered that this is a missed opportunity and that further consideration should be given to this issue within the Neighbourhood Plan, particularly in relation to recreational opportunities that could be provided for the village through the development of Site No.C2 to the west of St Margaretsbury Recreational ground. This land west of the village presents an opportunity to provide a significant area of both informal and formal outdoor recreation, including additional sports pitches, informal kick about areas, and parkland which the local community would benefit from.	no change			CE	Site C2 is immediately adjacent to the existing sports and recreation ground. We would not require a duplication of existing facilities
	Section 10 Transport and Paragraph 10.3	Section 10 sets out the Neighbourhood Plans strategy towards addressing transport and highway issues that affect the village. Paragraph 10.3 refers to the St Margarets train station, commenting that it is of "great importance", as it is a main line into London Liverpool Street and due to various factors including the introduction of the Oyster facility and lack of parking restrictions in surrounding road, has led to it being a popular station. Whilst this concern is acknowledged within the Neighbourhood Plan there are no specific policies that seek to address the issue of commuter parking at St Margarets train station. There is therefore a lack of strategic thinking as to how a more sustainable strategy could be brought about by the Neighbourhood Plan and specifically address the parking problem near to the railway station that has been identified by the local community	noted			CE	A key priority for the NP is to promote sustainable development, meeting the current and future needs of the community. The plan seeks to avoid generating an unacceptable increase in traffic movements and instead prioritise pedestrian and cycle modes of travel. There has been no strategic need identified for an additional public car park as the existing station is served by existing car parks both at the station concourse and the village car park. This plan will not wish to endorse an approach which would encourage commuters to drive to the village in order to park and access rail services.
		Associated with the train station is a level crossing within the heart of the village. The provision of parking at C2, on the western side of the village closest to the main arterial routes to the A10, could lessen traffic queuing at the level crossing. Instead the Neighbourhood Plan seeks to direct all allocations to the east of the level crossing thereby adding to the level crossing queue lengths. This locational benefit of C2 does not appear in the AECOM site assessment.	Noted			CE	As above. It should be noted that if a public car park were to be for the benefit of existing village residents, this would increase queuing at the level crossing as cars would need to approach through the village to access it. The AECOM report was a review of the NP site assessment methodology, not a site assessment document.
	East Herts Local Plan Review	The NPPF requires Neighbourhood Plans to be aligned with the strategic direction of Local Plan. This current Neighbourhood Plan is therefore proceeding a review of the District Plan and will therefore will become out of date soon after adoption. We would recommend a review policy is included within the Neighbourhood Plan to allow for subsequent consideration of changes that are made at a District Plan level.	no change			CE	The NPlan is required to be in conformity with the existing District Plan, which runs until 2033. It is outside of the scope of the NP process to consider how any future review would impact on housing targets.

		conclusion	<p>The Stanstead Abbots &amp; St Margarets Neighbourhood Plan sets out a strategy to deliver housing within and around the village, with a primary focus of protecting the Green Belt that surrounds the village. It is also acknowledged that there are other significant constraints within the village that limits site opportunities for development, including flood risk and heritage considerations. The NP Steering Group, over a considerable amount of time, has undertaken a site selection process to arrive at the housing allocation strategy that is set out within the Regulation 14 Neighbourhood Plan. This site selection process has however been focussed on delivering overall housing numbers rather than focussing on providing increased affordable homes to meet local needs. It has also failed to set out a clear strategy for delivering recreational/community gains that will benefit the local community</p>	noted			CE	<p>A fundamental requirement of the NPlan process is to accommodate the housing growth identified by EHDC within the District Plan (2015-2033). The NPlan will be in conformity with EHDC policy requirements around the provision of affordable homes. The plan also reflects wider community facilities identified through the development of the draft N Plan which are highlighted in section 8.</p>
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## Appendix 27

Policy	Policy Name	Para	Page	Comment Summary	Action	Change Required	Res id	Consultee	Comments
				<p>Considering you were only asked to build 94 homes you will note that our area has suffered the most with three separate areas built on around our estate [The Granary]. Totalling about 20 homes 19% of the total. A very high percentage considering none of the houses are affordable housing as being sold from £800k to £1million.</p> <p>The latest development the wilderness that was strongly objected to as it knocked down a small wood, is on a blind bend, a bus route and constantly floods. At no point have you considered or cared about the upheaval of these sites all the workman park on our estate blocking one side of the road to exit causing problems, and possible accidents, not to mention the constant traffic lights to allow deliveries, sewage electric etc. I also see no provision for schools, more trains, drs nothing.</p> <p>I hope there will be no more houses built around us but as the views of the residents are not really considered and though legally you have to go through this process you will build where you want without any regard for us.</p>	Noted		SASM1		You will note that the NP does not allocate any further sites close to you. The NP group is not responsible for the allocation of an additional 94 homes to the village (and it must be stressed this is a MINIMUM of 94, not a maximum); that was EHDC. The quantum of development proposed in the NP falls below the threshold requirements for schools, traffic and health infrastructure as confirmed by East Herts DC.
				I think the regulation 14 consultation paper looks sensible and I would be happy for it to go ahead	Noted		SASM2		
				<p>I've been renting in Stanstead Abbots for 1.5 years and would be keen to find a suitable permanent house for us to live for many years to come, I have become a member of the local village club, the cricket club and my local neighbour hood watch. My daughter has started an apprenticeship at the local dentist and feel we are a good addition to the village and hopefully the kind of family that should be given the opportunity to stay.</p> <p>I would like to understand what opportunity and provision maybe given to individuals that would be keen to build a home and or whether all land will be sold off to developers. I feel the village would benefit so much more from having individual homes built rather than identikit homes by large building companies. However large building companies will have the efficiencies of scale and resources to pay more for any available land and I hope that as part of this process, individuals who can add value to the Village should also be considered.</p> <p>I would welcome the chance to further engage in this process and would appreciate your feedback if available now as to the potential opportunities open to me and what I need to do next.</p>	No change		SASM3		East Herts have a policy for 'self-build' housing and maintain a register of self-build plots. It will be up to the owners of the allocated site to consider offering plots for self-build. - ACTION - possibility of negotiating with the Netherfield Lane developers for a couple of self-build plots?
				<p>Firstly, thanks to all involved for their hard work in getting the process to this stage. It does come across as well considered. My comments/queries/observations below.</p> <p>General:-</p> <ul style="list-style-type: none"> <li>- The draft plan provides no context as to what/where Regulation 14 fits in the entire process. i.e. once all the feedback from the draft plan under Regulation 14 is reviewed, what happens next and in what timescale?</li> <li>- It is implied in the forward, however there is little other coverage of:-</li> <li>- What protections does having an adopted neighbourhood plan provide up until 2033?</li> <li>- What will/might happen up to 2033 if the plan is not adopted?</li> <li>- What will/might happen after it expires in 2033 (assuming the plan is adopted)?</li> </ul>	No change		SASM4		The Regulation 14 draft of the NP is designed to read as if it were the final draft, therefore it cannot answer these questions within it.
SASM H3	Land east of Netherfield Lane/South of Roydon Road		3.16 18	The picture of derelict buildings in the brownfield portion of the site provided in figure 6 is not representative of the whole site. For completeness, a second picture should be provided to include the 'non developed part of the site' so that residents can clearly visualise the greenbelt portion of the site as well.	figure addition	include picture of green field in final plan	SASM4		
SASM NE1	Local Green Space		12 13 49	<p>Were the greenbelt fields that form a large area of site H3 evaluated and scored against Local Green Space criteria? If not, it's not clear to me from the plan how an apparent conflict between this policy and housing was concluded/resolved (sections below from Vision and Objectives also highlight where this conflict is apparent)?</p> <p>2.2 Our vision is for Stanstead Abbots, St Margarets and The Folly to thrive as a diverse and inclusive rural village that supports varied livelihoods and promotes community cohesion and well-being. (We will provide and promote locally accessible and sustainable development that provides affordable housing whilst protecting the heritage of our area.) [Our vision includes enhancing our green spaces for wildlife and community use, improving natural flood defences, and further establishing our place in the wider Lea Valley corridor.]</p> <p>[Objective H: To protect the Stanstead Abbots &amp; St Margarets countryside setting, landscape, and character, for the benefit of the village itself as well as the wider community.]</p> <p>[Objective K: To protect open spaces that have recreation, leisure and amenity value and/or are of importance to the local community.]</p>	no change		SASM4		The site was not assessed as a local green space as it is not publicly accessible
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	I understand site H3 is within The boundary of Lea Valley Regional Park? If so, for completeness should this be mentioned in The plan, along with understanding any influence/involvement LVRP may or may not have on future decisions for this site?	para change	3.18 add "within the Lea Valley Regional Park"	SASM4		LVRP have been consulted and made comments on this site. Site is within the LVRP but under private ownership.
				Absolute ridiculous we need to 'quote' policy numbers. The booklet has clearly been produced to put people off commenting. I understand that houses need to be built but with the housing proposal at Netherfield Lane and the quarry both at the same end of the village. How will the roads cope with the increased amount of traffic? I believe a roundabout is also proposed near the Lane in question how will the traffic coming out of this 'new' development even get onto the main road if there are hundreds of lorries 'legally' moving through the village? Build the houses by all means. People need homes they dont need to be poisoned by pollution from the quarry. Where is the proposal though for additional services in the village? I doubt the school can accommodate 94 new homes & the local doctors have closed their satellite surgery. There appears to be no mention of how 100's of people will be absorbed into local amenities.	Noted		SASM5		This is standard for consultation on official documents. The quantum of development proposed in the NP falls below the threshold requirements for schools, traffic and health infrastructure as confirmed by East Herts DC



SASM H6	Chapelfields and Abbotts Way Garages		28	<p>We are residents of No. 12 Cappell Lane and because of the area's parking difficulties not to mention the mayhem at school drop off / collection time we have for many years rented two garages on site SASM H6 solely for the purpose of parking safely. Please tell me what provision will be made for us when these garages are demolished!</p> <p>One of our three vehicles is a valuable motorcycle which I am naturally loath to park out of doors.</p> <p>Please note: There is no on street parking in our part of Cappell Lane, we have no vehicular access to the rear of our house and though not always obvious in daytime the adjacent roads are often full, early evenings being always a frantic competition among residents to find parking spot.</p> <p>Is it strictly correct to speak of an operational, fee earning local amenity as being a "Brownfield site"?</p> <p>Your reply and suggestions will be gratefully received.</p>	noted		SASM6		the NP cannot comment on any individual's particular circumstances. Suggest that you talk to Network Homes about renting a garage elsewhere.
SASM H2	Housing Numbers			[no comments within the form]			SASM7		
	Objectives		13	<p>Objective M: To ensure appropriate community, leisure and recreation facilities are provided as part of major developments. I cannot see any proposal to open a new Doctor's surgery to accommodate the increase in the local population, this is concerning especially as the village surgery closed and there is large scale development also planned in Ware and Hoddesdon putting pressure on the surgeries there. In addition, the only dentist in the village is already closed to new patients (unless paying privately) so there is no provision for the dental care that the additional households would require.</p>	noted		SASM8		The quantum of development proposed in the NP falls below the threshold requirements for schools, traffic and health infrastructure as confirmed by East Herts DC
	Objectives		13	<p>Objective Q: To implement traffic calming measures, where possible, that will protect the High Street and surrounding roads as well as ensuring safe and sustainable travel options to local schools/nurseries and place of work.</p> <p>With an increase of so many addition homes it is inevitable that traffic will increase in the local area and bring with it increased congestion, noise and pollution. Developments should be designed in such a way to limit these effects. The High Street, Cappell Lane and Roydon Road are all hot spots for speeding (particularly at night) and traffic calming measures such as 20 mph zones, speed bumps and speed cameras should be considered to reduce this issue.</p>	Noted		SASM8		The quantum of development proposed in the NP falls below the threshold requirements for schools, traffic and health infrastructure as confirmed by East Herts DC
			4.10	<p>36 "Vehicles should not be allowed to dominate the space, or inconvenience pedestrians and cyclists."</p> <p>There is an existing problem on Abbotts Way/Mill Race with cars dominating the space. A large number of residents living in Cappell Lane use the hill on Abbotts Way and Mill Race to park their vehicles as most of them do not have driveways or the ability to park nearer to their homes. This has the effect of making Abbotts Way and Mill Race extremely difficult to drive down as only one car may use the road at any time due to the amount of on-street parking. "keep clear" signs and road markings are also frequently ignored. In addition, cars often mount the pavement reducing the space available to pedestrians. Any development in this area (i.e. Site H6) should seek to address this issue as otherwise it will only exacerbate it.</p>	No change		SASM8	Any development will be expected to conform to the council's parking policy.	The NP addresses parking in relation to each new site so there should be no net increase in parking requirements. Refer to SASM D1 1F
			7.23	<p>53 "In the Neighbourhood Plan engagement survey 71% of respondents indicated that they would welcome more measures to address air pollution caused by the levels of traffic. Such measures could include 26/01/2023 Stanstead Abbotts &amp; St Margarets NP 54 speed controls in the village centre and anti-idling controls outside shops, schools and at the level crossing."</p> <p>This should be a priority as currently no such measures are in place. Idling is frequently observed on the High Street (both outside the Co-Op and on the road when the level crossing is down) and around St Andrews Primary School. Drivers should be encouraged to turn off their engines and there needs to be enforcement of this to protect local residents against the spikes in air pollution that this behaviour causes.</p>	No change		SASM8		Already included in Action Plan T5
				[no comments within the form]			SASM9		
SASM H5	Land west of Amwell Lane		26	<p>I noticed from the report that there is uncertainty about how many houses can be built on this site; and you are aware of flooding in one area. You also mention that drainage solutions should be investigated at the outset.</p> <p>Currently the drains along Amwell Lane are not taking rain water from the road effectively as they are blocked and have been for many years. (This has been reported to the council) If there is heavy rain fall water runs from the road down some of the side roads; certainly along Woodham Way which was like a river in Autumn 2021.</p> <p>I am sure it will also become apparent that the water table is very high in this area. Will this limit the amount of non permeable infrastructure that can be placed here?</p> <p>A new pedestrian path along Amwell Lane sounds good. I think that there should be parking restrictions along Amwell Lane. At the moment drivers are parking along the road who are taking the train from St Margarets. Does the cost of parking at the Station Car Park need to be reduced?</p>	No change		SASM10		already addressed in site policy SASM H5 3G
SASM H3	Land east of Netherfield Lane/South of Roydon Road			<p>The proposal to have a majority of the housing in Netherfield Lane will increase traffic through the village whereas this would not occur if the majority of houses were built nearer the Amwell roundabout. It will also increase traffic around the local primary school and will make it more difficult for residents of the village to get their children into St Andrew's as the houses in Netherfield Lane will likely be bought by families.</p>	Noted		SASM11		The quantum of development proposed in the NP falls below the threshold requirements for schools, traffic and health infrastructure as confirmed by East Herts DC
SASM H4	Land south of South Street			<p>Building houses on the Marina in South Street is a ridiculous idea. There are already traffic and parking problems all along South Street and the road is narrow. This will only increase the problems.</p>	policy change	site removed	SASM11		
				It's a joke and should NOT be happening	Noted		SASM12		
SASM H6	Chapelfields and Abbotts Way Garages			<p>There are considerable problems with parking at the moment, removal of these garages will only make things much worse. Added to all vehicles from the garages.</p>	Noted		SASM13		will be addressed as part of planning application consultation



SASM H11	First Homes		<p>We have enough traffic and people as we are. Further development will only prove detrimental to the area. Schools, local services and medical care - we no longer have a Dr Surgery in the villages. Level crossing traffic back up is quite enough already. People live here to enjoy the feeling of freedom which the green spaces provide not to be part of a larger congested town. This is a caring community which we wish to preserve.</p> <p>Parking is problematic now! Increased traffic flow will only make this worse...</p> <p>The time spent with increased build up of traffic due to the level crossing being down will increase the pollution in the High Rd and at both schools.</p> <p>Lack of specific services caused by the increase in population will be a deterioration to all residents.</p> <p>We value our villages as they are - enough is enough!</p>	Noted		SASM14		The quantum of development proposed in the NP falls below the threshold requirements for schools, traffic and health infrastructure as confirmed by East Herts DC
SASM H1	Village and Green Belt Boundary		I do not believe the green belt boundary should be revised.	Noted		SASM15		
SASM H3	Land east of Netherfield Lane/South of Roydon Road	ii) iii) iv) g)	<p>ii) out of a proposed 60 home proposal, only 6 are earmarked for community housing. There is no indication of how many of the remaining dwellings will be 'affordable'.</p> <p>iii) The green belt rule was put in place to keep green land safe for future generations. I object strongly to this proposal.</p> <p>iv) g) vehicular access to the site from Roydon Road would be a disaster, especially if the proposed quarry actually happens</p>	Noted		SASM15		This will be dealt with as part of the planning application. We are following EHDC policy on affordable housing - you have misread the site policy. As regards the Green Belt, it is not possible to accommodate the amount of housing required by the District Plan without taking some land out of Green Belt - this is dealt with in Section 3.8-3.11
SASM H4	Land south of South Street		This would be gross over-development. South Street residents already suffer from a lack of parking. Some residents from Riverside Cottages also park on the proposed development site as they have no parking spaces at all. Increased traffic flow both during and after construction would be detrimental to the current residents of South Street.	policy change	site removed	SASM15		
SASM H5	Land west of Amwell Lane	ii) iii) g)	<p>ii) again, this is green belt land and should be protected. It should not have been considered for development.</p> <p>iii) c) Amwell Lane already suffers from heavy traffic, which existing residents are finding increasingly difficult to cope with.</p> <p>g) this is a flood plain</p>	Noted		SASM15		This is not Green Belt, it is within the settlement boundary. Parking is dealt with as part of the policy. Site is not flood plain, though we have noted need to deal with drainage issues.
SASM H6	Chapelfields and Abbotts Way Garages	ii) a)/b)	<p>ii) no development should take place in a flood zone</p> <p>a)/b) over-development to two small sites to detriment of existing residents.</p>	Noted		SASM15		This is not flood zone. It is one of the few brownfield sites available for development. Only 7 units in total are proposed over 2 sites; this cannot be seen as over-development.
SASM H5	Land west of Amwell Lane		<p>This is a valuable green finger that brings the countryside into the centre of St Margarets. Thus I think proposing housing on this plot is in clear breach of Objective H which is to protect the countryside setting, landscape and character of the village.</p> <p>This protection of character and views is even more important given how much building has happened along the New River on the south side of the village.</p> <p>I value this green finger whether walking along the New River path or driving along Amwell Lane.</p> <p>The proposed development would also impact on those locals from just outside the village who currently park along Amwell Lane to use the local railway station and would almost certainly make both parking and road access worse.</p>	Noted		SASM16		
SASM B4	Farm and Tourism Related Business	ii)b)	68 I wish to propose setting up of a charity for a boat trip with full accessibility allowing people in wheelchairs and limited abilities, both physical and mental. I was the development work for what is now called 'Canalability' which operates from Burnt Mill Harlow. It would be brilliant if Lea Valley (The Marina) would give an accessible mooring to the charity, or if Willowthorpe Care Home would agree to allowing the charity to use their river space especially if they have people who could use it.	noted		SASM17		
SASM H5	Land west of Amwell Lane		I have lived [in Amwell Lane] 50 years. Been involved with five extensions i.e. RC RAFTS with no problems. Will require services to be intrinking. H5 has sunk over a metre in places - cost of foundations? I have no objection re houses. PS I passed my POC certificate; I think ground is a concern.	Noted		SASM18		would be dealt with in course of site investigations
SASM H7	Land east of Amwell Lane		I have lived [in Amwell Lane] 50 years. Been involved with five extensions i.e. RC RAFTS with no problems. Will require services to be intrinking. H7 has sunk over a metre in places - cost of foundations? I have no objection re houses. PS I passed my POC certificate; I think ground is a concern.	Noted		SASM18		would be dealt with in course of site investigations
SASM H7	Land east of Amwell Lane		<p>existing pedestrian walkway would need to be improved to ensure same pedestrian access</p> <p>- traffic calming measures would be needed given increased traffic, including potential relocation on or start of national speed limit on Amwell lane to further beyond residential limits</p> <p>- adequate parking would be required to ensure no additional pressure on already limited parking and congestion along Amwell lane</p>			SASM19		



SASM H5	Land west of Amwell Lane		existing pedestrian walkway would need to be improved to ensure same pedestrian access. traffic calming measures would be needed given increased traffic, including potential relocation on of start of national speed limit on Amwell lane to further beyond residential limits. adequate parking would be required to ensure no additional pressure on already limited parking and congestion along Amwell lane.	Noted		SASM19		already in Plan - SASM H5 3H
SASM H3	Land east of Netherfield Lane/South of Roydon Road		Generally: Having attended the Neighbourhood Plan event on 4 March 2023, I agree entirely with the conclusions reached by the Neighbourhood Plan Steering Group. The Netherfield Lane site is clearly the obvious location for the provision of the bulk of the required housing. Given that some 'green belt' land will be needed in order to achieve the housing target, the field between the Websters 'brownfield' site and the rear of the Almshouses is an obvious choice. As far as I know, this field hasn't ever been used for grazing, agriculture or leisure activities of any kind and is little more than scrub land. I think the work undertaken by the Steering Group to produce this Neighbourhood Plan is outstanding. The analysis of the options appears robust and, in my view, should be adopted without amendment.	noted		SASM20		thank you very much
SASM H3	Land east of Netherfield Lane/South of Roydon Road		I am objecting to the allocation of site SASM H3 land east of Netherfield Lane.  The original plan to put 20 houses on the old brown field site was an acceptable redevelopment. However the addition of the greenfield site adjacent to the existing Alms Houses is totally unacceptable. The greenfield site has already been decimated by the owners in advance of expecting to receive planning permission. Making the site look less attractive seems like a ploy to get the necessary approval as a site for future development. The site as put forward, would also cause a lot more traffic on a dangerous bend on Roydon Road/Netherfield lane junction.  Putting 60 new houses at one end of the village on one site and close to the proposed quarry is a poor choice.	Noted		SASM21		
SASM H3	Land east of Netherfield Lane/South of Roydon Road	iii iv.d iv.f iv.g iv.i	111. We strongly object to the use of greenbelt 1V. d Green space play area unsuitable next to B181 and entrance to housing estate. 1V. f Many trees and bushes have already been felled. 1V. g The impact on Cats Hill and Roydon Road will cause many extra vehicles to be turning in and out of this dangerous junction. To move the junction nearer to the Armshouses will make it a real accident black spot and destroy a fine oak tree 1V. i The land behind our property is higher than our listed building and the new housing will stand out above our garden and rear windows taking light away	Noted		SASM22		NP does not give any specific locations for siting of play areas, etc. All of this would be dealt with as part of consultation on specific planning applications. A Transport Impact Assessment will be required - SASM H4 3G. Also refer to SASM TR2. But check planning application - it is unlikely that permission will be given for any new housing that overlooks existing housing.
SASM D1	Design of Development	a. h.	a. 5 Bedroomed houses, large blocks of car parking and roads behind a hedge next to a habital area are not compatible. h. These houses are very close to our property	Noted		SASM22		most existing housing in the village is pretty closely packed.
SASM D3	Amenity		1. Loss of light and noise from cars and houses	noted		SASM22		will be addressed as part of planning application consultation. Refer to SASM D3 1
	Heritage Assets	i ii iii	1. This development of the greenbelt will not enhance the conservation area and should have been listed as a cherished view. 11. This development will not preserve and enhance Fern Cottage but will change the look of the area. 111. The greenbelt field in netherfield lane should not be lost and should have been a protected view.	Noted		SASM22		residents were invited to put forward any view they thought should be included in the protected views; this site was never put forward until after it began to be known that it was to be allocated. Largely because the view cannot actually be seen from anywhere apart from the surrounding houses. refer to SASM H3 4F
SASM NE2	Nature Conservation		1. 60 houses plus a network of roads is not going to deliver net biodiversity gains of 10% The area of habital is very small.	Noted		SASM22		refer to SASM H3 4F
SASM NE3			Hedge behind the Armshouses along Footpath 006 1 It is in a very poor state, and has not been maintained or cared for properly. The public footpath is very overgrown, a very sad situation for a Valued Hedgerow	Noted		SASM22		NP cannot address issues of maintenance
SASM B1		iii	111. The non-conforming employment site (part of H3 Brownfield area). This brownfield site needs redevelopment but not at the expense of the greenbelt.	Noted		SASM22		Rationale for doing so has been addressed in SASM H1 village and green belt boundary
SASM TR2	Traffic impact of Major Development		1. This development in netherfield lane will generate much more traffic to this end of the village on a dangerous bend at the bottom of a steep hill. We are already facing the prospect of Harlow Village 8 10,000 homes and Briggens Quarry 200metres from H3. It is unfair to suggest that we could cope with all at this end of the village.	Noted		SASM22		All of this would be dealt with as part of consultation on specific planning applications. A Transport Impact Assessment will be required - SASM H4 3G. Also refer to SASM TR2.
SASM H5	Land west of Amwell Lane		This piece of land is a valuable green strip. The view from the New River path would be spoiled. In addition, it would increase parking problems on Amwell Lane, where people already park to use the train service.	noted		SASM23		
	Foreword	1	May I applaud this remarkably detailed report and all the hard work that has gone into it. Well done!	noted		SASM24		
		14	P14. I have no objection to Easneye Historic Park being identified as a non-designated heritage asset, NHA1.	noted		SASM24		



SASM NE1	Local Green Space		49	P49. Some years ago, the "Land between Kitten Lane and Hunsdon Road and Roydon Road" was declared to be Common land. My father, who is the landlord, has no recollection of having been consulted. I'm content that this be identified as Local Green Space, LGS10. But in return, I would be glad if the Parish could take some responsibility for its upkeep, i.e. clearing rubbish, evicting squatters and attending to the trees, including the magnificent cedar tree identified in para 7.34.	noted		SASM24		refer to Parish Council
			8.6	59	To better reflect the public rights of way, please can the wording be amended to "... Briggens Grade II designated Historic Park and Garden and the public footpaths that skirt around the local important Easneye Historic Park ...".		SASM24		
	Easneye Historic Park			81	P81. I can't find the Easneye Site Record prepared by the Hertfordshire Gardens Trust document in the evidence base. Can this be added to the website or a soft copy be emailed to me, please?		SASM24		
	Appendix H			108	p108 I note the area of Flood zone 3 to the south of Hunsdon Road cottages. As owner of that ditch, I'd be happy for the Environment Agency to check whether a leaky dam could be installed to mitigate this hazard.	Noted	SASM24		
				43	There is an error on page 43. Stanstead Bury is Grade 2 * We can't see any mention of St Andrews Church or St Mary Church surely these are valued community assets, and where is St Andrews school mentioned? Also the playground and The Meadow	para change	ACTION - verify and change	SASM25	
SASM H3	Land east of Netherfield Lane/South of Roydon Road	iii iv.e			III refers to "There should be no greater land-take of greenfield land than is necessary" - Please advise how this statement was derived and what is the measure? According to government guidelines (National Planning Policy Framework), greenfield land should never be built on to prevent urban sprawl and countryside encroachment such that the land-take of green belt for this proposal is completely unacceptable and inappropriate .  IV e) refers to "the highest ratio of parking to bedrooms should be provided" - If that means about 100 to 150 extra cars belonging to the occupants of the proposed development, then it is very obvious that the junction between Netherfield Lane and Roydon Road will become a bottleneck. It is also 100% certain that there will be a high frequency of serious accidents with cars coming down the Cats Hill part of Roydon Road which has quite a steep incline. Why has a Transport Impact Assessment not already been undertaken which could confirm the futility of ever considering such a development? (IV. g) states that "A Transport Impact Assessment will be required" such that it would appear that a TIA has yet to be commissioned).	noted		SASM26	change policy re parking SASM H3 4E. Traffic Impact Assessment would be done by developer if required.
SASM H5	Land west of Amwell Lane				My house is a bungalow. I will lose the views from my front windows. I will be overlooked by black clad 2 or 3 storey houses and it will be like living on a housing estate.	Noted		SASM27	address at planning application stage - the neighbourhood plan does not include such detail (e.g. black cladding) on the individual homes. A development of around 6-8 homes will not create the impression of living on a housing estate.
SASM H5	Land west of Amwell Lane				Can you guarantee that my health will not be affected by the building work in front of my house (I have asthma). The fumes from the speeding cars down Amwell Lane are horrendous now. What will it be like with more lorries and dumpsters are parked along Amwell Lane. How can you guarantee the wildlife will be protected along the new river? How will this help the environment building on such a small green field? I am very concerned about drainage and flooding - we already pay a premium near a flood plain - how can you guarantee that we will be protected from floors from the new river? What will happen to the trees that I can see from my window - will they be chopped down like the new development in Stansted Road [Hoddesdon Road] which are the ugliest 3 storey buildings I have ever seen. How sad never to see the beautiful view again.	Noted		SASM28	Not a matter for the NP. Contractor will be required to provide construction management plan (CMP) prior to development.
			8.8	60	I have few comments of any material importance. However, those that I do have are, I believe, comments which should be taken seriously: I am surprised to see that St Andrew's, along with the Wilshire Hall, and St Mary's Churches are not included as valuable community assets.	noted		SASM29	these do not fit definition of community assets
		1.26, Section 5		11	Your comment on the fact that "some boats on the Lea and Stort are lived in". I think that this issue is more deserving of comment and policy than it is given. The number of people living on boats has increased dramatically over the last 20 years, is causing serious problems in terms of both water pollution and the generation of rubbish on the tow paths and should be discouraged. The Parish Council should be working with the Lands and Rivers Trust to enforce their bylaws and deal with this issue. Para 1.26 and section 5	noted		SASM29	not for NP.



		7.4	47	<p>You state that "climate change has to be addressed as a matter of urgency" and that every effort will be made to:</p> <ul style="list-style-type: none"> <li>- Increase the number of trees.</li> <li>- Replace any lost trees.</li> <li>- Add to biodiversity.</li> <li>- Decrease pollution.</li> <li>- Reduce the over-use of natural resources.</li> </ul> <p>In order to ensure that these are not mere words (as is the case in the East Herts District Council Plan) it seems to me that you need to be much more robust on a number of issues. These being:</p> <p>(a) Water pollution. Thames Water is currently pumping semi-treated sewage onto land in Stanstead Abbots and into the River Stort (one of only 200 chalk streams in the world) on a regular basis. They need to be strongly encouraged by the Paris Council and local community to undertake the necessary capital investment to end this outrageous practice. They currently claim that they cannot "afford" the modest investment required.</p> <p>(b) Litter Pollution. The A414 and the B181 cross the parish. Both roads suffer from extensive plastic pollution as a consequence of many years of failure by the East Herts District Council to comply with their legal obligation to pick the rubbish on the verges of both roads. Much of this plastic ends up in the water courses, the rivers and ultimately the sea, compounding the devastating impact of micro plastic pollution in our oceans. The Parish Council and local community should campaign to prevent litter being dumped and to force the local authority to comply with its legal obligations to remove that which is.</p> <p>(c) Light Pollution. The excessive use of streetlights in Stanstead Abbots and St Margarets causes three main problems which should be addressed:</p> <ul style="list-style-type: none"> <li>- An unnecessary use of energy.</li> <li>- Adversely impacts biodiversity (bats, birds and insects particularly).</li> <li>- Makes our villages feel more urban than they really are and increases the feeling of coalescence with surrounding settlements.</li> <li>- Reduces, if not eliminates, our ability to see the stars and night sky.</li> </ul>	no change		SASM29		Mainly fall under the responsibility of other statutory authorities. Does not fall within the remit of the Plan. Refer to SASM D1 1C.
		7.4	47	<p>The lights between the edge of the village and the Amwell roundabout, and at the top of Cats Hill, are particularly unnecessary and offensive and should be removed. Existing buildings should be encouraged to remove/reduce external lighting (Netherfield House is an example of a development which many rural villages would not allow). New developments should be subject to severe restrictions on external lighting. The excessive lighting (height and quantity) in the High Street should be reduced. Oddly you include reducing light pollution in your action list as a low priority. Surely this cannot be right.</p>	para change	4.9. Extent of external lighting for safety should be balanced with ecological consideration.	SASM29		
	Section 10		69	<p>Traffic. Section 10. There is no mention of the increasing use of the B181 as a rat-run into Harlow. This adversely impacts both the settled area and surrounding farmland and is not sustainable. Attempts should be made to reduce usage and to limit speeds. In my view the road between Cats Hill and the Toll Road should be narrowed to ensure that it is more like a country B road (as it is between the Toll Road and Roydon Station).</p>	no change	changes to the public highway are outside of scope of NP	SASM29		
SASM NE1	Local Green Space			<p>I strongly suggest that you add the old Netherfield Park (now owned by the Lee Valley Regional Park) to your list. This is the area between the brownfield land contained in H3 and the A414. It is open land, where there is public access and which should be preserved in order to prevent development, particularly access roads.</p>	no change		SASM29		land already protected under LVRP and Green Belt
				<p>The Green Belt was established in 1955 to contain urban sprawl, maintain the separation of settlements, protect prime agricultural land around settlements, and encourage urban regeneration and compact towns and cities. EHDC's District Plan includes the largest release of green belt land in England, representing over 6% of our green belt. Many of its proposed green belt developments will have a direct impact on our community:</p> <p>1. Gilston (Harlow North) Outline planning has been granted for a residential development comprising of 8,500 houses. This will result in at least 17,000 additional private vehicles on our local roads in addition to home deliveries, with west bound journeys passing by or through our community.</p> <p>2. The New Stort Crossings East Herts and Harlow Councils have approved the Central Stort Crossing and Eastern Stort Crossings. These will bring additional traffic from the new M11 Junction 7A, creating a new east-west link, which will move traffic past Harlow onto the A414, creating a west bound bottle neck at the Amwell Roundabout. Once backed up past the A414 Stanstead Abbots exit, the traffic will rat run through our High Street and local roads, grid locking our community.</p> <p>3. Village 7 This dystopianly named residential development comprising of 1,500 houses will be less than 2 ½ miles to our east, just a stone's throw beyond the new quarry. Where will the Village 7 commuters park their cars during the day? There will be no new parking facilities at Harlow, just a new footbridge. They won't want to park in Roydon because it's outside the TFL Oyster / contactless zone so the peak return fare to Central London is £25.80 compared to £21.00 from St Margarets. This is going to put more pressure on our local streets - Amwell Lane and Lawrence Avenue are full already and EHDC is opposing new Residents Parking Zones so residents' ability to park outside their own properties is at risk.</p>	Noted		SASM30		outside scope of NP



			<p>1.Briggs Quarry The local impact will be devastating, including some 400 lorry journeys per day. The current plan is for the lorries to exit the site onto the A414 east bound, but when the Eastwick roundabout is removed this route won't work for west bound traffic. It is inevitable that Tarmac will seek to reopen the Netherfield Lane slip roads onto the A414, closing the footpath and bridleway for a "temporary" 30 year period. When the traffic jam backs up past the slip roads, the self-employed lorry drivers will either sit in their cabs losing money or divert through Stanstead Abbots High Street. (This is a county council not a district council project.)</p> <p>2.WARE 2 The Northeast Ware development proposes 1,800 houses, up 20% from the 1,500 detailed in the WARE2 master planning policy. Northeast Ware will be four miles to our north, with access from the new development to the B1004 at Widbury Hill into Stansted Abbots for east bound traffic to the previously mentioned new developments, Harlow and the M11.</p> <p>These five schemes have only ever been considered in isolation, there has been no traffic or pollution modelling on the overall impact. The cumulative effect of the above five schemes will be devastating for our community, our three villages will become three traffic islands and air pollution, already above WHO limits, will become the worst in Hertfordshire. Given this appalling record, EHDC's Putinesque offer of a neighbourhood plan land for peace deal needs to be treated with caution. Anyone who thinks that EHDC can be appeased with just one more field is putting hope before the facts. Any rational analysis of EHDC's behaviour can only conclude that the EHDC machine will grind relentlessly on, destroying our woodlands, open spaces, and greenbelt, until such time as we stop them. An opportunity to do so presents itself on the 4th of May. For just one day every four years, the views and wishes of ordinary citizens take precedence over the corporate greed, vested interests and commercial lobbying that drives EHDC decision making at other times. We need to use this opportunity wisely. We need to obtain firm commitments from prospective district councillors that they will vote against any further green belt losses regardless of their party whips. If they refuse, we need to vote for a candidate who will commit. We also need firm commitments to push back against the district plan at every opportunity. We won't be able to stop all of it, but every field and every tree saved will be a victory for the people and defeat for corporate greed.</p>	Noted		SASM30		
			<p>By the time we get to vote on the Neighbourhood Plan, we will know the results of the district council elections and we'll have had an opportunity to assess the impact on planning and development. We should also be better placed to judge the impact of the NPPF changes announced by Michael Gove, Secretary of State for Levelling Up, Housing and Communities in December 2022. Current national planning policy allows councils to remove land from the Green Belt when they are preparing new Local Plans – but only if they can show that there are "exceptional circumstances" for doing so. If EHDC were behaving reasonably, they would not claim that the release of this amount of green belt for so little housing gain when 1500 houses are planned just 2 ½ miles up the road constitutes "exceptional circumstances" and therefore our greenbelt is not eligible for release, but when our district councillor queried this with EHDC, he was told: "The requirement for at least 94 new homes in Stanstead Abbots and St Margarets is set out in Policy VILL1 of the District Plan. In accordance with the policy, if the housing requirement is not met by the adoption of a Neighbourhood Plan, the Council will consider whether it is necessary to identify the site for development through a Site Allocations Development Plan. In this scenario the parish council and neighbourhood plan group would have less control in the allocation and design of proposed sites. Without a neighbourhood plan, there is potential for speculative development in the Green Belt." By way of contrast, Mole Valley District Council has responded to the NPPF changes by requesting that the inspector removes all green belt allocations from their local plan. In Conclusion: EHDC is a development obsessed council prepared to ignore planning regulations in pursuit of its unsustainable agenda against the wishes of its residents. We need to make a stand and demand a reduction in the housing allocation so that we can agree a neighbourhood plan and preserve our greenbelt.</p>	Noted		SASM30		the target has been set by EHDC and has not been reduced.
SASM H3	Land east of Netherfield Lane/South of Roydon Road		<p>I heartily endorse this well designed proposal which will provide much needed family homes in Stanstead Abbots. It will be an ideal extension to the village, and will give a new life to the previously unused area of scrubland. Congratulations to the team responsible for drafting the Neighbourhood Plan document in such a professional manner.</p>	Noted		SASM31		
SASM H4	Land south of South Street		<p>As a frequent user of the towpath into the village, I would like reassurance that the view from the towpath will not be adversely affected by the development of this site.</p>	policy change	site removed	SASM32		
			<p>Applies to all housing development covered by the Stanstead Abbots St Margarets Neighbourhood Plan</p> <p>All dwellings should be well insulated, incorporate electricity generation facilities eg solar panels or heat source pumps so that they are carbon neutral, both in terms of construction and running costs.</p> <p>Adequate parking for each dwelling is mandatory.</p>	para change	add in sentence re need to move towards carbon neutral section 4 design	SASM32		building regulations would require all these things of new development
SASM H5	Land west of Arnwell Lane		<p>As with H4, the development should not adversely affect views from the New River Path, by careful design of the site to incorporate green spaces and trees. Privacy of the housing occupants is important, ie no view from river path into residents windows.</p>	policy change	site removed	SASM32		site removed



		Foreword of Summary Leaflet	paragraph 2 says 'Sites selected for development could not be those considered prone to flooding' but if you put the postcode of where the H5 development is proposed into the government's <a href="https://check-long-term-flood-risk.service.gov.uk/risk">https://check-long-term-flood-risk.service.gov.uk/risk</a> its says we have a high risk of surface water / flash flooding. The same is true for H7. When I drew a shape in the area houses are proposed it said it was in zone 3 and "Land within flood zone 3 has a high probability of flooding from rivers and the sea." It also says "surface water flooding risk". When the houses at 1,3, 5 and 7 Amwell Lane were built only four were built because the land was considered too flood-prone. With the advent of global warming isn't flooding here more likely rather than less?	policy change	site removed	SASM33		not in flood zone 3
		Foreword of Summary Leaflet	paragraph 2 says 'Sites selected for development could not be those considered prone to flooding' Why are all of the proposed developments in Great Amwell suggested in the lowest part of the Parish? The land on the East side of the New River is far higher and surely therefore far more suitable for new developments. This fundamental rule when choosing locations seems to have been ignored. Surely it would be better to move the green-belt boundary a little on the higher land rather than building houses on areas that may flood?	policy change	site removed	SASM33		
SASM H5	Land west of Amwell Lane		The field that H5 is proposing to build on regularly floods with water particularly accumulating in the South-East corner of the field and the garden of 7 Amwell Lane. This is not mentioned in the Neighbourhood Plan proposal. The statement about site H7 about its "liability to flood" and "further assessment will be necessary to determine the extent of the site's viability" is equally true here, probably more so. If concrete is put where the water currently ends accumulates, the water will just be displaced into the gardens of 5 and 7 Amwell Lane, flooding the gardens and potentially the houses too.	policy change	site removed	SASM33		
SASM H5	Land west of Amwell Lane		Household insurance with flood protection is very difficult and expensive to obtain here because of the above flood risks and is far more expensive than other areas. Surely areas with a lower flood risk should be prioritised.	policy change	site removed	SASM33		evaluation of sites has taken into account the suitability of each site in relation to the flood zones
SASM H5	Land west of Amwell Lane		The description mentions permeable paving but I am not sure how this will help. The water table is just below the ground so there will be nowhere for the water to soak downward to.	policy change	site removed	SASM33		
SASM H5	Land west of Amwell Lane		The Plan specifies that up to 8 homes of 1.5 or 2 stories could be built. But construction costs will have to include costly flood prevention and piled foundations. If developers say that it is not financially viable unless they build more / higher / on more of the land will this be considered or are these specifications about numbers and height firm red lines? Given the small scale of the scheme and the many issues with it I have outlined here, surely the costs ( build costs, flood risks, inability to get household insurance, severe effect on parking ) far outweigh the benefits?	policy change	site removed	SASM33		
SASM H5	Land west of Amwell Lane		The four odd-numbered houses on Amwell Lane have been close to being flooded by surface water as a result of the drains outside our houses being inadequate. Will this be addressed as part of the work if it is carried out?	policy change	site removed	SASM33		
SASM H5	Land west of Amwell Lane		Mentions a 'Water management scheme'. I don't think it is clear what this means but whatever it means how will we be able to test that it works? What independent assessment of the plan, and testing of the implementation will be carried out? The field only floods a couple of times a year so without thorough planning I am concerned that if the scheme isn't sufficient we will only find out when our houses flood.	policy change	site removed	SASM33		
SASM H5	Land west of Amwell Lane		Can you guarantee that the land between the existing houses in Amwell Lane ( 1, 3 and 5) and the New River will remain undeveloped as per the plan? Won't having housing next to this area act as a precedent for future planning applications? Is it guaranteed that it won't be built on, and if so will it be available for the current owners of the adjacent houses to consider purchasing to extend their gardens and for peace of mind that they won't become boxed in? SASM H9 seems to suggest that 'appropriate infilling' will be supported so I am concerned that the houses suggested in SASM H5 in the plan will only be the first of many schemes here once they are in place	policy change	site removed	SASM33		
SASM H5	Land west of Amwell Lane		Many commuters park their cars where the development is proposed to use the railway station. The numbers wishing to park here will no doubt increase once the other nearby developments in Harlow and Ware are completed. Will there still be on-street parking available as there is at the moment? Otherwise this development will exacerbate existing parking problems. There is already only very limited parking in Amwell Lane available for those in the even numbered housing. The residents on Station Road on our side of the level crossing also park there. If there is no on-street parking here, where are these residents going to be able to park their vehicles?	policy change	site removed	SASM33		
SASM NE4	Environmental Impact of Flooding		What does 'Major developments' mean? Does H5 count as a 'major development' and will a Flood Risk and Water Management Plan therefore be carried out?	policy change	site removed	SASM33		
SASM H5	Land west of Amwell Lane		As residents of Woodham Way (located just metres opposite the H5 site) for over 20 years, the comments we raise are based upon: 1. Long term personal experience, direct observation and daily interaction with the site in question; 2. Examination of the Regulation 14 Consultation Plan recently issued to local residents; 3. Reference to County and Local planning policies.  We wish to formally object to the inclusion of Site J5 in the draft Neighbourhood Plan and request it removed from the draft plan in its entirety. Our rationale is as follows: <b>The Site is inherently unsuitable for development for the following reasons:</b> The site is zoned 3a in the East Herts Strategic Flood Risk Assessment (SFRA) - High probability of flooding The site is very wet almost all year round. Water ponds on the site and it appears to have a drainage function similar to that of a toe drain to the adjoining embankment. Developing the site would require works into the banks of the New River aqueduct, undermining its structural integrity. Leaks down the embankment are already frequently seen. This would be exacerbated by the piling required for foundations due to the unconsolidated material in this area; this presents a significant risk to properties along a sizeable stretch of Amwell Lane, Woodham Way and The Nook. Although minor remedial maintenance works have been undertaken on Amwell Lane, surface water fails to drain adequately due to poorly maintained, overloaded drainage infrastructure and regularly overflows down Woodham Way as the path of least resistance - this is a private road for which the residents bear the cost of maintenance to road surface and drains. Access to the development and the inevitable associated 'overflow' parking would add to existing unacceptable congestion and obstruction of established 'KEEP CLEAR' zones on Amwell Lane, an issue created by residents of Station Road and train station users who use it as a free all day car park irrespective of road markings. Furthermore, the establishment of an additional pedestrian path would potentially narrow even further an already dangerously congested road used by many in and out of the village as a high speed rat-run to Ware. The proposed development site forms part of a commuting corridor for bats.	policy change		SASM34		



SASM H5	Land west of Amwell Lane		<p>The SEA Report (2022) is substandard and inherently flawed. It has merged climate change and flood risk into 3 generic paragraphs without a considered appraisal of each matter. It is also dismissive of the serious effects of flood risk west of the River Lee. SASM H5 was identified as Flood Zone 3a in the East Herts Strategic Flood Assessment, and therefore is only suitable for development if it has passed the sequential and exception tests. The SEA makes no reference to the SFRA or the exception test. A SFRA must be carried out for this plan, and its outcomes suitably risk assessed, mitigated and addressed, before any development proceeds in Flood Zone 3.</p> <p>The only conclusion for H5 is that development would have a permanent, adverse effect of major significance due to the ability to manage water on and running off site, and the increased flood risk to neighbours.</p>	policy change	site removed	SASM34	changes will need to be made to the SEA to reflect need for sequential testing and flood risk assessment	
SASM H5	Land west of Amwell Lane		<p>The New River is a well recognised commuting corridor for bats. Given the location of the area close to the extensive water bodies of the S</p>	no change		SASM34	any planning application would need to include a bat survey	
SASM H5	Land west of Amwell Lane		<p>My concerns primarily centre around the impact of the proposed development on traffic, drainage and the natural aesthetics of the village and the lane.</p> <p>Firstly the proposed development is likely to worsen the already congested traffic management issues on Amwell Lane. The development is likely to increase the number of vehicles using the lane, leading to increased safety risks.</p> <p>Secondly the proposed development plan adversely affects the drainage in the area, especially considering the area for development is situated within the flood zones. The area's flood defences are already under stress and any further development may exacerbate the situation by reducing the existing natural drainage channels this land naturally provides. This could lead to increased risk of flooding during periods of heavy rainfall.</p> <p>Finally, the proposed development will impact the aesthetics of the area and this should also be taken into consideration. The nearby residents and visitors appreciate the natural beauty of the area and the construction of a multi-storey development will detract from this aspect, changing the character of the village and neighborhood.</p> <p>In summary, I express my concerns about the draft neighbourhood plan summary H5 land west of amwell lane. The overall impact for just a handful of homes may be too much of a price to pay for the development's potential benefits. I urge you to reconsider the development plan proposals for H5 and take into account the concerns of the community and the potential long term impact.</p>	noted		SASM35	quantum if development is too low to have any impact that could be assessed. Policy SASM H5 C3 makes it clear that parking should be minimised and on plot so should not add to parking pressures in Amwell Lane. Issues around aesthetics of area can be raised at planning application stage.	
SASM H5	Land west of Amwell Lane		<p>1) This is a relative thin strip of green space with a regular water table issue. Development would appear to be very close to the new river with an obvious flood risk</p> <p>2) There are already congestion and parking difficulties along this section</p> <p>3) Green space is being lost at an alarming rate around the village and I believe new developments should be focused on brown field sites.</p>	noted		SASM36	as above. SASM H5 3i references 3 meter green access zone. 3) so do we. All brownfield sites were considered at site assessment.	
SASM H5	Land west of Amwell Lane		<p>I would like to understand how the parking and traffic controls will be managed during and after the development is approved ( if at all). At the moment that area of road is used heavily by people parking and then making there journey by train from St Margarets station.It is also becoming a heavily used cut through road.My concern is that the station parking will move further down Amwell Lane and people may choose to try and park in our small culdesac turning. (Meridian Way) . My question - what will be put in place to avoid this ? Can station parking be addressed to accommodate what is currently free parking in Amwell Lane. Or possibly single yellow lines with a 1 hour time restriction. Thank you</p>	policy change	site removed	SASM37		
	Objectives	Natural Environment I	4	<p>The plan recognises the need to protect woodland spaces and water networks and be resilient to flooding, but fails to mention the preservation of the dark, semi-rural night-time environment against the encroachment of light pollution. This is a particularly high risk given plans for new housing in the neighbourhood and the district, which will result in more street lighting and light leak from increased numbers of domestic properties and businesses. The natural environment of Stanstead Abbots and St Margarets must not be transformed into a light polluted urban environment by overlooking light pollution.</p>	para change	refer to addition to 4.9	SASM38	
SASM D1	Design of Development	1c		<p>Energy efficiency can be maximised by preventing wasteful light pollution</p> <p>It should be recognised that light pollution is detrimental to the amenity of neighbouring properties, and hence lighting control to preserve the dark semi-rural natural environment is important</p>	para change	refer to addition to 4.9; refer to D1 1C	SASM38	



SASM NE2	Nature Conservation	III	Measures to deliver Biodiversity net gains should include restrictive requirements on outdoor lighting and light spill, to minimise light pollution and its detrimental effect on the natural environment and in particular species adapted to a natural diurnal cycle of night and day.	para change	refer to addition to 4.9	SASM38		
			<p>This is a general comment, we would like the Parish Council to consider our proposed site in the centre of the village. We have submitted pre-application to EHDC and await feedback, this is due mid-April 2023:</p> <p>The Oakleys and Frees are a local family. We have lived in the village for more than 100 years. During that time, we have seen the enormous changes in the village. This is why we are committed to providing homes for key workers and people with local connections who are on a limited budget or may choose to rent. In short, we want to do our bit to redress the balance.</p> <p>The land at 73 High Street is we believe in an ideal location. It is in the centre of the village, allowing people to shop, work, attend school and socialise locally. Plus there is easy access to the excellent public transport network.</p> <p>We have submitted a pre-application to EHDC and we are awaiting their feedback. Our proposed eco-homes - there could be 18-27 homes depending on the Council's feedback - will all be built to ensure decent space standards and will have minimal environmental impact.</p> <p>Several dwellings will be fully accessible level-access apartments. We plan to provide additional community facilities such as electric charging points, landscaped grounds and an outdoor seating area for villagers to meet.</p> <p>Our homes are for local people responding to the local need. It is our priority to reflect and conserve the local character of Stanstead Abbots.</p>	no change		SASM39		site was assessed when brought forward and failed critical criteria round.
SASM H5	Land west of Amwell Lane		<p>Whilst I commend the values and efforts of the Neighbourhood Plan, I must strongly oppose the allocation site H5 within the plan, and instead suggest it is allocated as a Local Green Space under Policy SASM NE1.</p> <p>The site, roughly a wedge shape, forms essential, characterful views into the conservation area from both the New River Path and Station Road and provides an important Green Wedge into the village from the Green Belt. The East Herts District Plan 2018 allocates the wedge of land to north as an open space under policy CFLR1, with the further allocation of local green spaces within the neighbourhood plan on the opposite side of the New River, it seems incorrect to allocate this space for housing development when it is in fact a continuation of the existing open space and it greatly adds to the amenity value of the New River Path, giving it an open, green character, which would be entirely spoiled by introducing new built form.</p> <p>The site was not assessed within Appendix G, the Local Green Space Assessment, of the Plan. Before the plan moves forward the site should be assessed as a Local Green as it appears to meet many of the plans criteria for a Local Green Space, including its attractiveness, as a wide green wedge into the village and Conservation Area, tranquility, lending to the quiet character of the New River Path and Amwell Lane; and wildlife value as meadow grassland, one of the highest scoring land uses within the government's latest Biodiversity Metric. All of these factors would lead to the sites allocation as Local Green Space.</p> <p>The allocation of the site would be detrimental to the character of Amwell Lane, which is open along its west side for its entire length, the allocation of site H5 would cause irreversible damage to the character of the lane which lends to the character of the village transition from open, Metropolitan Green Belt Land to the built form within the conservation area to the southern end of Amwell Lane. This would be contrary to Objective E of the plan, as it would destroy the rich character and history of the New River along Amwell Lane and Objective K, as it would remove an open space essential to the amenity of residents of the village. The character of the New River path should remain open and tranquil in nature.</p> <p>The site assessment criteria for the site does not mention the proposals impact on the adjacent allocated open space. In addition, it is concerning that the site identification and allocation criteria at Appendix C does not mention any assessment of the availability of the site and if it will become available within the plan period. To the best of my knowledge the site is currently on a long lease and will not be available within the plan period. There is also no clear expression of interest from Thames Water to develop the site, therefore it should be removed from the plan.</p>	policy change	site removed	SASM40		does not connect to the Green Belt; not considered as a protected view. Not publicly accessible land so not assessed as Local Green Space.



SASM H5	Land west of Amwell Lane		<p>The Neighbourhood Planning Team will be well aware of the issues of access along Amwell Lane, whilst the allocation proposes a 'new footpath' this would only be possible within the ownership of the current landowner, such a short footpath would do little to alleviate any traffic issues. The allocation also pays little attention to parking pressures along Amwell Lane, the parking along Amwell Lane is essential to residents of the cottages within the Station Road Conservation Area who do not have access to off street parking. This parking stress is exacerbated by users of the Station, to allocate this frontage for housing, which would provide further parking stress, along with the second allocation of site H7, opposite site H5, would place unacceptable parking stress on Amwell Lane. Ideally site H5 should be removed, however if not the allocation should be strengthened to ensure any proposed scheme provides a solution to parking stress along Amwell Lane, such as an off street parking area for existing residents of Amwell Lane and Station Road.</p> <p>In addition, there is no clear transport assessment within the evidence base to suggest that the parking and access issues have been assessed. A full assessment of Amwell Lane should be carried out before the plan is taken forward, or the site should be removed in order to limit any further issues on Amwell Lane The evidence base of the plan should be boosted to include a clear transport assessment for any sites which may have an adverse impact on local traffic flow, in line with Paragraph 102 of the National Planning Policy Framework.</p> <p>In addition, recent changes to government policy suggest that housing targets, such as the target for 96 homes, will be removed subject to an up-to-date local plan. With EHDC's plan being up to date, and the permissions for 8,500 and 1,500 homes respectively being granted at Gilston in March 2023, it is suggested that the making of the neighbourhood plan should be paused until clarity is given by central government on housing targets. This view has been supported by inspectors and Local Authorities across the country.</p> <p>In conclusion, the allocation of the site should be removed, and the site should be allocated as a local green space to benefit the village throughout the next plan making period.</p>	policy change	site removed	SASM40	<p>new footpath is to provide safe access for new site and would be a likely requirement from Highways. It is not the role of the NP to undertake a detailed traffic assessment for any one site.</p>
SASM HAZ	Non-Designated Heritage Assets (NHA)		<p>I commend the inclusion of a policy for non dedicated heritage assets, however I believe that 24 Station Road, a now vacant property, should be included.</p> <p>The property is a fantastic example of victorian design with many original features. Moreover the property is of great historic value, being the original taxi 'carriage' provider linked to the station and its heritage should be preserved, particularly when considering its current 'at risk', vacant status.</p>	para change	see comment	SASM40	<p>2014 conservation area assessment &amp; management plan specifically mentions this property (Litchfield House) as one of the unlisted buildings which make an important architectural or historic contribution to the village. Property has now been sold.</p>
SASM H3	Land east of Netherfield Lane/South of Roydon Road	21	<p>The use of green belt to provide housing is an unacceptable outcome to this neighbourhood plan. I am totally opposed to any green belt development to satisfy housing needs.</p> <p>The plan also stipulates that 60 homes are proposed even though the numbers required by the site are 46.</p> <p>Item (iii) on the plan states that there will be no greater land take than necessary, so clearly 14 homes are not required to be built on Green Belt if the plan stands by its pledge.</p> <p>Item 4f states that there should be a retention of existing trees and hedgerows and yet the landowner has devastated this beautiful vista by removing dozens of trees and hedgerows. Clearly what the plan says and what happens are quite different.</p>	no change		SASM41	<p>Our first priority was to find sites within the settlement boundary, however due to the unique constraints surrounding Stanstead Abbots explained in the plan, it was not possible to meet the allocation without going into the Green Belt. Please see the Green Belt appendix for a more detailed explanation. Dwelling numbers are based on the estimated capacity of the site, which in the case of this site could actually be higher than 60. Given the restrictions on sites within the village (flood zone, etc) and the questions over deliverability of housing on those sites, we cannot afford to restrict the numbers on this site below 60. The NP has no control over what landowners do to their land prior to adoption of the plan.</p>
SASM HA4	Protected Views	46	<p>View 1 and 2 actually impinge on the Netherfield Lane development proposal, so any development will impact on the views around Cats Hill</p>	noted		SASM41	<p>any development would need to take views 1 and 2 into account</p>
SASM NE1	Local Green Space	47	<p>The choices of Local Green Spaces on the list are all very understandable, however the magnificent view from the bottom of the Netherfield Lane field looking east up the hill was one of the most beautiful "green views" in the village and yet it has been deemed unworthy of protection and the landowner has been allowed to decimate the trees and hedgerows. Proposing the building of houses on one of the most beautiful areas will take away one of the villages best visual delights. How has this Local Green Space been omitted from the list as it is clearly comparable with those that have been chosen.</p>	no change			<p>site is not publicly accessible so does not meet the criteria for a local green space. Site is considered of limited visual amenity.</p>
SASM NE2	Nature Conservation	56	<p>The plan states that "in the East Herts District Plan, policy NE3 states that development which would result in the loss or significant change to trees, hedgerows or ancient woodlands will not be permitted". The decimation of dozens of trees and hedgerows has already happened so how can this be the case when it contradicts the East Herts District Plan.</p> <p>The neighbourhood plan is making statements that it is not in control of and therefore how can development of Green Belt be considered when landowners are freely damaging the green environment.</p> <p>Plan references 7.34, 7.35, 7.36 and 7.37 all reference the value of protecting trees and hedgerows and yet the plan proposal to build on Green Belt totally contradict this. It would appear that the plan wants to pick and choose what it wants to apply and where. Building on Green Belt and decimating fields, trees, hedge rows and Vista's should be compromised for house building.</p>	no change		SASM41	<p>The NP has not been adopted yet and we have no control over landowners actions on their own land. This underlines the importance of adopting an NP which will have some measure of control over use of land.</p>



		Flooding	57 & 58	Bad flooding has already occurred in Roydon Road and Netherfield Lane in recent years including damage to property. To build housing and concrete over grass land that would naturally absorb excessive rain fall may cause further damaging floods in years to come for the properties in the area of Netherfield Lane. This is an unnecessary worry for homeowners in this area.	no change		SASM41		This will be considered at planning application stage. The developer would be required to ensure that there was no run off from their site.
SASM H3	Land east of Netherfield Lane/South of Roydon Road			Serious concerns exist amongst residents of Stanstead Abbots of a planned quarry at the top of Cats Hill. The chair of the Parish Council said at a public meeting that home ownership close or adjacent to the quarry will be horrendous for those homeowners and yet the main site proposal is close to the proposed quarry. This raises serious concerns when the same Parish Council is saying how awful it would be to live near the quarry and yet proposes property to be built near the site (if agreed). This will potentially cause significant stress and disruption for those families and potential health issues. This would seem irresponsible to propose the Netherfield Lane site when this risk is very real.			SASM41		There are existing houses between the site and the proposed quarry; there is no adjacency between this site and the quarry.
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	The use of green belt to provide housing is an unacceptable outcome to this neighbourhood plan. I am totally opposed to any green belt development to satisfy housing needs. The plan also stipulates that 60 homes are proposed even though the numbers required by the site are 46. Item iii) on the plan states that there will be no greater land take than necessary, so clearly 14 homes are not required to be built on Green Belt if the plan stands by its pledge. Item 4f states that there should be a retention of existing trees and hedgerows and yet the landowner has devastated this beautiful vista by removing dozens of trees and hedgerows. Clearly what the plan says and what happens are quite different.	no change		SASM42		same as above highlighted
SASM H3	Land east of Netherfield Lane/South of Roydon Road			Serious concerns exist amongst residents of Stanstead Abbots of a planned quarry at the top of Cats Hill. The chair of the Parish Council said at a public meeting that home ownership close or adjacent to the quarry will be horrendous for those homeowners and yet the main site proposal is close to the proposed quarry. This raises serious concerns when the same Parish Council is saying how awful it would be to live near the quarry and yet proposes property to be built near the site (if agreed). This will potentially cause significant stress and disruption for those families and potential health issues. This would seem irresponsible to propose the Netherfield Lane site when this risk is very real.	no change		SASM42		There are existing houses between the site and the proposed quarry; there is no adjacency between this site and the quarry.
		Flooding	57 & 58	Bad flooding has already occurred in Roydon Road and Netherfield Lane in recent years including damage to property. To build housing and concrete over grass land that would naturally absorb excessive rain fall may cause further damaging floods in years to come for the properties in the area of Netherfield Lane. This is an unnecessary worry for homeowners in this area.	no change		SASM42		repeated comments
SASM NE2	Nature Conservation		56	The plan states that "in the East Herts District Plan, policy NE3 states that development which would result in the loss or significant change to trees, hedgerows or ancient woodlands will not be permitted". The decimation of dozens of trees and hedgerows has already happened so how can this be the case when it contradicts the East Herts District Plan. The neighbourhood plan is making statements that it is not in control of and therefore how can development of Green Belt be considered when landowners are freely damaging the green environment. Plan references 7.34, 7.35, 7.36 and 7.37 all reference the value of protecting trees and hedgerows and yet the plan proposal to build on Green Belt totally contradict this. It would appear that the plan wants to pick and choose what it wants to apply and where. Building on Green Belt and decimating fields, trees, hedge rows and Vista's should be compromised for house building.	no change		SASM42		repeated comments
SASM NE1	Local Green Space			The choices of Local Green Spaces on the list are all very understandable, however the magnificent view from the bottom of the Netherfield Lane field looking east up the hill was one of the most beautiful "green views" in the village and yet it has been deemed unworthy of protection and the landowner has been allowed to decimate the trees and hedgerows. Proposing the building of houses on one of the most beautiful areas will take away one of the villages best visual delights. How has this Local Green Space been omitted from the list as it is clearly comparable with those that have been chosen.	no change		SASM42		repeated comments
SASM HA4	Protected Views			View 1 and 2 actually impinge on the Netherfield Lane development proposal, so any development will impact on the views around Cats Hill	no change		SASM42		
SASM H3	Land east of Netherfield Lane/South of Roydon Road			The use of green belt to provide housing is an unacceptable outcome to this neighbourhood plan. I am totally opposed to any green belt development to satisfy housing needs. The plan also stipulates that 60 homes are proposed even though the numbers required by the site are 46. Item iii) on the plan states that there will be no greater land take than necessary, so clearly 14 homes are not required to be built on Green Belt if the plan stands by its pledge. Item 4f states that there should be a retention of existing trees and hedgerows and yet the landowner has devastated this beautiful vista by removing dozens of trees and hedgerows. Clearly what the plan says and what happens are quite different.			SASM43		
SASM HA4	Protected Views		46	View 1 and 2 actually impinge on the Netherfield Lane development proposal, so any development will impact on the views around Cats Hill			SASM43		repeated comments
SASM NE1	Local Green Space			The choices of Local Green Spaces on the list are all very understandable, however the magnificent view from the bottom of the Netherfield Lane field looking east up the hill was one of the most beautiful "green views" in the village and yet it has been deemed unworthy of protection and the landowner has been allowed to decimate the trees and hedgerows. Proposing the building of houses on one of the most beautiful areas will take away one of the villages best visual delights. How has this Local Green Space been omitted from the list as it is clearly comparable with those that have been chosen.			SASM43		repeated comments



SASM NE2	Nature Conservation		56	The plan states that "in the East Herts District Plan, policy NE3 states that development which would result in the loss or significant change to trees, hedgerows or ancient woodlands will not be permitted". The decimation of dozens of trees and hedgerows has already happened so how can this be the case when it contradicts the East Herts District Plan. The neighbourhood plan is making statements that it is not in control of and therefore how can development of Green Belt be considered when landowners are freely damaging the green environment. Plan references 7.34, 7.35, 7.36 and 7.37 all reference the value of protecting trees and hedgerows and yet the plan proposal to build on Green Belt totally contradict this. It would appear that the plan wants to pick and choose what it wants to apply and where. Building on Green Belt and decimating fields, trees, hedge rows and Vista's should be compromised for house building.			SASM43		repeated comments
		Flooding	57 & 58	Bad flooding has already occurred in Roydon Road and Netherfield Lane in recent years including damage to property. To build housing and concrete over grass land that would naturally absorb excessive rain fall may cause further damaging floods in years to come for the properties in the area of Netherfield Lane. This is an unnecessary worry for homeowners in this area.			SASM43		repeated comments
SASM H3	Land east of Netherfield Lane/South of Roydon Road			Serious concerns exist amongst residents of Stanstead Abbots of a planned quarry at the top of Cats Hill. The chair of the Parish Council said at a public meeting that home ownership close or adjacent to the quarry will be horrendous for those homeowners and yet the main site proposal is close to the proposed quarry. This raises serious concerns when the same Parish Council is saying how awful it would be to live near the quarry and yet proposes property to be built near the site (if agreed). This will potentially cause significant stress and disruption for those families and potential health issues. This would seem irresponsible to propose the Netherfield Lane site when this risk is very real.			SASM43		repeated comments
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	The use of green belt to provide housing is an unacceptable outcome to this neighbourhood plan. I am totally opposed to any green belt development to satisfy housing needs. The plan also stipulates that 60 homes are proposed even though the numbers required by the site are 46. Item iii) on the plan states that there will be no greater land take than necessary, so clearly 14 homes are not required to be built on Green Belt if the plan stands by its pledge. Item 4f states that there should be a retention of existing trees and hedgerows and yet the landowner has devastated this beautiful vista by removing dozens of trees and hedgerows. Clearly what the plan says and what happens are quite different.			SASM44		repeated comments
SASM HA4	Protected Views		46	View 1 and 2 actually impinge on the Netherfield Lane development proposal, so any development will impact on the views around Cats Hill			SASM44		repeated comments
SASM NE1	Local Green Space		47	The choices of Local Green Spaces on the list are all very understandable, however the magnificent view from the bottom of the Netherfield Lane field looking east up the hill was one of the most beautiful "green views" in the village and yet it has been deemed unworthy of protection and the landowner has been allowed to decimate the trees and hedgerows. Proposing the building of houses on one of the most beautiful areas will take away one of the villages best visual delights. How has this Local Green Space been omitted from the list as it is clearly comparable with those that have been chosen.			SASM44		repeated comments
SASM NE2	Nature Conservation		56	The plan states that "in the East Herts District Plan, policy NE3 states that development which would result in the loss or significant change to trees, hedgerows or ancient woodlands will not be permitted". The decimation of dozens of trees and hedgerows has already happened so how can this be the case when it contradicts the East Herts District Plan. The neighbourhood plan is making statements that it is not in control of and therefore how can development of Green Belt be considered when landowners are freely damaging the green environment. Plan references 7.34, 7.35, 7.36 and 7.37 all reference the value of protecting trees and hedgerows and yet the plan proposal to build on Green Belt totally contradict this. It would appear that the plan wants to pick and choose what it wants to apply and where. Building on Green Belt and decimating fields, trees, hedge rows and Vista's should be compromised for house building.			SASM44		repeated comments
		Flooding	57 & 58	Bad flooding has already occurred in Roydon Road and Netherfield Lane in recent years including damage to property. To build housing and concrete over grass land that would naturally absorb excessive rain fall may cause further damaging floods in years to come for the properties in the area of Netherfield Lane. This is an unnecessary worry for homeowners in this area.			SASM44		repeated comments
SASM H3	Land east of Netherfield Lane/South of Roydon Road			Serious concerns exist amongst residents of Stanstead Abbots of a planned quarry at the top of Cats Hill. The chair of the Parish Council said at a public meeting that home ownership close or adjacent to the quarry will be horrendous for those homeowners and yet the main site proposal is close to the proposed quarry. This raises serious concerns when the same Parish Council is saying how awful it would be to live near the quarry and yet proposes property to be built near the site (if agreed). This will potentially cause significant stress and disruption for those families and potential health issues. This would seem irresponsible to propose the Netherfield Lane site when this risk is very real.			SASM44		repeated comments
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	The use of green belt to provide housing is an unacceptable outcome to this neighbourhood plan. I am totally opposed to any green belt development to satisfy housing needs. The plan also stipulates that 60 homes are proposed even though the numbers required by the site are 46. Item iii) on the plan states that there will be no greater land take than necessary, so clearly 14 homes are not required to be built on Green Belt if the plan stands by its pledge. Item 4f states that there should be a retention of existing trees and hedgerows and yet the landowner has devastated this beautiful vista by removing dozens of trees and hedgerows. Clearly what the plan says and what happens are quite different.			SASM45		
SASM HA4	Protected Views		46	View 1 and 2 actually impinge on the Netherfield Lane development proposal, so any development will impact on the views around Cats Hill			SASM45		



SASM NE1	Local Green Space		47	The choices of Local Green Spaces on the list are all very understandable, however the magnificent view from the bottom of the Netherfield Lane field looking east up the hill was one of the most beautiful "green views" in the village and yet it has been deemed unworthy of protection and the landowner has been allowed to decimate the trees and hedgerows. Proposing the building of houses on one of the most beautiful areas will take away one of the villages best visual delights. How has this Local Green Space been omitted from the list as it is clearly comparable with those that have been chosen.			SASM45	
SASM NE2	Nature Conservation		56	The plan states that "in the East Herts District Plan, policy NE3 states that development which would result in the loss or significant change to trees, hedgerows or ancient woodlands will not be permitted". The decimation of dozens of trees and hedgerows has already happened so how can this be the case when it contradicts the East Herts District Plan. The neighbourhood plan is making statements that it is not in control of and therefore how can development of Green Belt be considered when landowners are freely damaging the green environment. Plan references 7.34, 7.35, 7.36 and 7.37 all reference the value of protecting trees and hedgerows and yet the plan proposal to build on Green Belt totally contradict this. It would appear that the plan wants to pick and choose what it wants to apply and where. Building on Green Belt and decimating fields, trees, hedge rows and Vista's should be compromised for house building.			SASM45	
		Flooding	57 & 58	Bad flooding has already occurred in Roydon Road and Netherfield Lane in recent years including damage to property. To build housing and concrete over grass land that would naturally absorb excessive rain fall may cause further damaging floods in years to come for the properties in the area of Netherfield Lane. This is an unnecessary worry for homeowners in this area.			SASM45	repeated comments
SASM H3	Land east of Netherfield Lane/South of Roydon Road			Serious concerns exist amongst residents of Stanstead Abbots of a planned quarry at the top of Cats Hill. The chair of the Parish Council said at a public meeting that home ownership close or adjacent to the quarry will be horrendous for those homeowners and yet the main site proposal is close to the proposed quarry. This raises serious concerns when the same Parish Council is saying how awful it would be to live near the quarry and yet proposes property to be built near the site (if agreed). This will potentially cause significant stress and disruption for those families and potential health issues. This would seem irresponsible to propose the Netherfield Lane site when this risk is very real.			SASM45	repeated comments
SASM H3	Land east of Netherfield Lane/South of Roydon Road			Our family at 91 Roydon Road are all very disappointed about the proposed housing development on Netherfield lane. We have lived in this house on for over 16 years and the view into the field has always been extremely precious and special to us and of course as the field is green belt we have always felt it was safe and secure from development.  Looking at the neighbourhood plan and speaking to other village members it feels as though the plan is squeezing all of the housing into very impractical and unpopular plots of land.  We would really liked to have seen a united push back against East Herts Council on the quota they are trying to impose on the village rather than willingly handing precious land over without protest.	no change		SASM46	The 94 home target has been set by East Herts and is a minimum quota. The outcome of our refusing to choose sites for these homes would in all likelihood not be no additional homes but more than 94, as East Herts would then be unable to resist applications for development of all and any site around the village. A developer could appeal any refusal to grant planning permission, knowing that because the council had not met its housing quota target, the planning inspector would most likely overturn the decision on those grounds.
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	Residents that are on the fringe of this development proposal enjoy a rural outlook. Many residents have objected to this proposal from the outset of the plan. We have raised many concerns that have been pushed aside. However, in reading the recent objection by the Lea Valley Park Authority, residents will agree that our rural setting will be severely compromised with light and noise pollution and this is an unacceptable infringement on our outlook and our quality of life in this area of the village. The use of Green Belt should not be used to compromise residents quality of life or compromise the rural aspects and enjoyment that so many people benefit from in this rural part of the village. With an invasion of housing from Harlow reaching out towards Stanstead Abbots, we need to protect the precious Green Belt to maintain our boundaries, not develop it so that we join up with a massive urban sprawl and a potential quarry.	no change		SASM45	Site is not publicly accessible land so cannot be considered to be of benefit to the community as a whole. There is no right to a view in English law. The development in Harlow (Gilston East) is some considerable distance from the village so this cannot be said to "join up" with urban sprawl. All material concerns raised have been considered
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	Residents that are on the fringe of this development proposal enjoy a rural outlook. Many residents have objected to this proposal from the outset of the plan. We have raised many concerns that have been pushed aside. However, in reading the recent objection by the Lea Valley Park Authority, residents will agree that our rural setting will be severely compromised with light and noise pollution and this is an unacceptable infringement on our outlook and our quality of life in this area of the village. The use of Green Belt should not be used to compromise residents quality of life or compromise the rural aspects and enjoyment that so many people benefit from in this rural part of the village. With an invasion of housing from Harlow reaching out towards Stanstead Abbots, we need to protect the precious Green Belt to maintain our boundaries, not develop it so that we join up with a massive urban sprawl and a potential quarry.		repeated comments	SASM44	Site is not publicly accessible land so cannot be considered to be of benefit to the community as a whole. There is no right to a view in English law. The development in Harlow (Gilston East) is some considerable distance from the village so this cannot be said to "join up" with urban sprawl. All material concerns raised have been considered at length and fully responded to, mostly in responses to previous consultation.



SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	<p>Residents that are on the fringe of this development proposal enjoy a rural outlook. Many residents have objected to this proposal from the outset of the plan. We have raised many concerns that have been pushed aside. However, in reading the recent objection by the Lea Valley Park Authority, residents will agree that our rural setting will be severely compromised with light and noise pollution and this is an unacceptable infringement on our outlook and our quality of life in this area of the village.</p> <p>The use of Green Belt should not be used to compromise residents quality of life or compromise the rural aspects and enjoyment that so many people benefit from in this rural part of the village.</p> <p>With an invasion of housing from Harlow reaching out towards Stanstead Abbots, we need to protect the precious Green Belt to maintain our boundaries, not develop it so that we join up with a massive urban sprawl and a potential quarry.</p>		repeated comments	SASM42		Site is not publicly accessible land so cannot be considered to be of benefit to the community as a whole. There is no right to a view in English law. The development in Harlow (Gilston East) is some considerable distance from the village so this cannot be said to "join up" with urban sprawl. All material concerns raised have been considered at length and fully responded to, mostly in responses to previous consultation.
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	<p>Residents that are on the fringe of this development proposal enjoy a rural outlook. Many residents have objected to this proposal from the outset of the plan. We have raised many concerns that have been pushed aside. However, in reading the recent objection by the Lea Valley Park Authority, residents will agree that our rural setting will be severely compromised with light and noise pollution and this is an unacceptable infringement on our outlook and our quality of life in this area of the village.</p> <p>The use of Green Belt should not be used to compromise residents quality of life or compromise the rural aspects and enjoyment that so many people benefit from in this rural part of the village.</p> <p>With an invasion of housing from Harlow reaching out towards Stanstead Abbots, we need to protect the precious Green Belt to maintain our boundaries, not develop it so that we join up with a massive urban sprawl and a potential quarry.</p>		repeated comments	SASM43		
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	<p>Residents that are on the fringe of this development proposal enjoy a rural outlook. Many residents have objected to this proposal from the outset of the plan. We have raised many concerns that have been pushed aside. However, in reading the recent objection by the Lea Valley Park Authority, residents will agree that our rural setting will be severely compromised with light and noise pollution and this is an unacceptable infringement on our outlook and our quality of life in this area of the village.</p> <p>The use of Green Belt should not be used to compromise residents quality of life or compromise the rural aspects and enjoyment that so many people benefit from in this rural part of the village.</p> <p>With an invasion of housing from Harlow reaching out towards Stanstead Abbots, we need to protect the precious Green Belt to maintain our boundaries, not develop it so that we join up with a massive urban sprawl and a potential quarry.</p>			SASM41		
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	<p>I am totally against the use of the Green Belt Field for building housing. I think that the field and surrounding area should be kept for wild life for local residents and visitors to enjoy. I feel that the 21 properties going on the brown field site would be the maximum for the Netherfield Lane site. Any more would devastate Green Belt land. The suggestion of having a pond to take surface water before being pumped away is a great concern. I am concerned where the water is going to be pumped away to and if there was ever a loss of power, there may be a risk of flooding and this may put increased risk of flooding on residents in Netherfield Lane and Roydon Road, an area that is already at great risk of flooding.</p> <p>We have already lost much wild life on the Netherfield Lane field because the land owner has taken down many established trees and hedgerows, which your plan says is meant to be protected. I am also very concerned that any further house building on protected Green Belt land will create unacceptable noise and light pollution to my property.</p> <p>I am also concerned about contaminated land in the Websters Site and the impact this will have on the local environment. This and the proposed quarry could create significant health risks to local residents.</p>			SASM47		We cannot deliver the quantum of homes set by EHDC without amending the Green Belt boundary. Issues around specific detailed design of the site are not part of the NP
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	<p>I am totally against the use of the Green Belt Field for building housing. I think that the field and surrounding area should be kept for wild life for local residents and visitors to enjoy. I feel that the 21 properties going on the brown field site would be the maximum for the Netherfield Lane site. Any more would devastate Green Belt land. The suggestion of having a pond to take surface water before being pumped away is a great concern. I am concerned where the water is going to be pumped away to and if there was ever a loss of power, there may be a risk of flooding and this may put increased risk of flooding on residents in Netherfield Lane and Roydon Road, an area that is already at great risk of flooding.</p> <p>We have already lost much wild life on the Netherfield Lane field because the land owner has taken down many established trees and hedgerows, which your plan says is meant to be protected. I am also very concerned that any further house building on protected Green Belt land will create unacceptable noise and light pollution to my property.</p> <p>I am also concerned about contaminated land in the Websters Site and the impact this will have on the local environment. This and the proposed quarry could create significant health risks to local residents.</p>			SASM48		We cannot deliver the quantum of homes set by EHDC without amending the Green Belt boundary. Issues around specific detailed design of the site are not part of the NP
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	<p>The use of green belt to provide housing is an unacceptable outcome to this neighbourhood plan. I am totally opposed to any green belt development to satisfy housing needs.</p> <p>The plan also stipulates that 60 homes are proposed even though the numbers required by the site are 46.</p> <p>Item iii) on the plan states that there will be no greater land take than necessary, so clearly 14 homes are not required to be built on Green Belt if the plan stands by its pledge.</p> <p>Item 4f states that there should be a retention of existing trees and hedgerows and yet the landowner has devastated this beautiful vista by removing dozens of trees and hedgerows. Clearly what the plan says and what happens are quite different.</p>			SASM49		We cannot deliver the quantum of homes set by EHDC without amending the Green Belt boundary. 94 homes is a MINIMUM target, not a maximum; the calculation that only 46 homes are required on this site is based on the theory that all other sites selected will provide the maximum possible; we have always said that some sites are highly unlikely to deliver as many homes as we need.



SASM HA4	Protected Views		46	View 1 and 2 actually impinge on the Netherfield Lane development proposal, so any development will impact on the views around Cats Hill			SASM49		repeated comments
SASM NE1	Local Green Space		47	The choices of Local Green Spaces on the list are all very understandable, however the magnificent view from the bottom of the Netherfield Lane field looking east up the hill was one of the most beautiful "green views" in the village and yet it has been deemed unworthy of protection and the landowner has been allowed to decimate the trees and hedgerows. Proposing the building of houses on one of the most beautiful areas will take away one of the villages best visual delights. How has this Local Green Space been omitted from the list as it is clearly comparable with those that have been chosen.			SASM49		repeated comments
SASM NE2	Nature Conservation		56	The plan states that "in the East Herts District Plan, policy NE3 states that development which would result in the loss or significant change to trees, hedgerows or ancient woodlands will not be permitted". The decimation of dozens of trees and hedgerows has already happened so how can this be the case when it contradicts the East Herts District Plan. The neighbourhood plan is making statements that it is not in control of and therefore how can development of Green Belt be considered when landowners are freely damaging the green environment. Plan references 7.34, 7.35, 7.36 and 7.37 all reference the value of protecting trees and hedgerows and yet the plan proposal to build on Green Belt totally contradict this. It would appear that the plan wants to pick and choose what it wants to apply and where. Building on Green Belt and decimating fields, trees, hedge rows and Vista's should be compromised for house building.			SASM49		repeated comments
		Flooding	57 & 58	Bad flooding has already occurred in Roydon Road and Netherfield Lane in recent years including damage to property. To build housing and concrete over grass land that would naturally absorb excessive rain fall may cause further damaging floods in years to come for the properties in the area of Netherfield Lane. This is an unnecessary worry for homeowners in this area.			SASM49		repeated comments
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	Serious concerns exist amongst residents of Stanstead Abbots of a planned quarry at the top of Cats Hill. The chair of the Parish Council said at a public meeting that home ownership close or adjacent to the quarry will be horrendous for those homeowners and yet the main site proposal is close to the proposed quarry. This raises serious concerns when the same Parish Council is saying how awful it would be to live near the quarry and yet proposes property to be built near the site (if agreed). This will potentially cause significant stress and disruption for those families and potential health issues. This would seem irresponsible to propose the Netherfield Lane site when this risk is very real.			SASM49		repeated comments
SASM H3	Land east of Netherfield Lane/South of Roydon Road		21	Residents that are on the fringe of this development proposal enjoy a rural outlook. Many residents have objected to this proposal from the outset of the plan. We have raised many concerns that have been pushed aside. However, in reading the recent objection by the Lea Valley Park Authority, residents will agree that our rural setting will be severely compromised with light and noise pollution and this is an unacceptable infringement on our outlook and our quality of life in this area of the village. The use of Green Belt should not be used to compromise residents quality of life or compromise the rural aspects and enjoyment that so many people benefit from in this rural part of the village. With an invasion of housing from Harlow reaching out towards Stanstead Abbots, we need to protect the precious Green Belt to maintain our boundaries, not develop it so that we join up with a massive urban sprawl and a potential quarry.			SASM49		repeated comments
SASM H4	Land south of South Street			south street is very narrow, enabling only one side to be used for parking. The proposed area is used to park 15 - 20 vehicles. There is no alternative parking in the area. Building more properties in this area will cause extra traffic and severe parking difficulties. South Street already has problems with traffic congestion.	policy change	reduction in number of dwellings to 2	SASM50		
			3.4	15 The plan is essentially flawed because insufficient attention has been given to the limitations on house building caused by flood zones to the east of the village.	noted		SASM51		this was taken into consideration in the site selection process.
			3.11	16 The plan has paid insufficient attention to the impact on loss of greenbelt land to the east of the village by both the Briggens Estate Quarry and the 7 Gilston Village Developments. This will cause an urban/industrial coalescence with Harlow.	para change	Gilston East is outside the NP area. Add para in Section 1 to pick up wider policy context	SASM51		
SASM H3	Land east of Netherfield Lane/South of Roydon Road	IV g) & e)	21	g) A Transport Impact Report commissioned by Stanstead Parish Council shows that the junction opposite this site will have significant traffic increases from both Gilston Village 7. This is on a dangerous bend, and is listed on HCC Traffic Maps as a congestion zone. The developers plans show there will be a new exit road to the site which will further limit sight lines below acceptable guidelines and will be closer to the junction on this dangerous bend. It is estimated that with 60 + homes on this site, there will be a minimum of 40 additional vehicle movements during peak hours. e) The new exit position will require the removal of a cherished oak tree, which is very much at odds with the NP statement	no change		SASM51		a) A full Transport Impact Assessment would form part of any planning application and any changes to the Highway would have to be agreed with HCC. B) detailed design considerations do not form part of the NP and will be considered as part of the planning application
SASM HA4	Protected Views		46	View 2 "The viewEast up Cat Hill towards the Almshouses" fails, deliberately, to include the greenbelt fields behind the Almshouses that gives such a characteristic rural view to this part of the village that is cherished by residents, and is home to abundant biodiversity.			SASM51		The view was of the Almshouses and the historic trees at the top of the hill. The field behind the Almshouses can be barely glimpsed from this standpoint. Refer to SASM NE2
SASM H4	Land south of South Street			Traffic, (domestic and marina-related) parking, drains, water supply. South Street already struggles with all of these issues. The drains barely cope with surface run-off and sometimes don't. The street is one way as there is little off-street parking available and it cannot cope with the heavy marina traffic which periodically knocks down fences when the vehicle cannot manage the turn towards the marina entrance. The water supply is shared and of variable pressure. As a resident of South Street for over 20 years I would like to see much more detail about upgrades to services to alleviate all these issues before more homes are built in an area with inadequate access, parking, drainage and water supply.	policy change	reduction in number of dwellings to 2	SASM52		
SASM H5	Land west of Amwell Lane			Land west of Amwell Lane. Flooding, constant issues with inadequate drainage and woefully inadequate road.	policy change	site removed	SASM52		



		10 Transport	69	<p>Stanstead Abbots is a settlement in a miraculous rural pocket sandwiched between the A10, A414 and the M11 approached on all sides, with the exception of the B181 from the A10, by small rural roads. The noise from the A414 is a constant presence in our lives. Never mind air quality, where is there mention of the measures to keep transport in general, and transport noise to a minimum with the increased population, particularly along the A414 corridor? There are very few crossings of the River Lea so when something goes wrong at the barrier in Stanstead Abbots, traffic builds up very quickly and it's a long diversion to get round it.</p>	noted		SASM52		refer to SASM TR2
SASM H3	Land east of Netherfield Lane/South of Roydon Road			<p>This plan identifies sites for 94 homes to be built in the village in addition to 15 already built over the plan period. Approximately 60 of those homes will be built on Netherfield Lane, an unadopted bridleway in the Green Belt.</p> <p>I am appalled by the plan that has completely overlooked the devastating effect on residents of Stanstead Abbots due to the other plans to subject the neighbourhood to the quarry proposed at the same end of the village as the Netherfield Lane development.</p> <p>1. The District Council has said that development cannot be limited to a maximum of 60 homes, as the Neighbourhood Plan group have suggested, and they say that other site proposals in the plan seem to be unrealistic, so it is likely that the scale of development at Netherfield Lane will be bigger. Initially 20 homes were planned now 60 and most likely a minimum of 100.</p> <p>2. The scale of development is wholly inappropriate at that end of the village, being furthest from amenities (shops, buses, trains and access to main roads), and no infrastructure plans are in place to support the additional population – particularly primary school places (St Andrews is one form per year entry, with no space to expand) and NHS services (we have no local GP and the dentist is not taking new NHS patients). This means that people have to drive to facilities elsewhere.</p> <p>The impact this will have on traffic at the end of the village that is already impacted by speeding and accidents. There will be many more cars going through the rest of the village as a result (for the above reasons). The Parish Council's own traffic survey (commissioned in the light of the planned quarry, also at that end of the village) reflects these concerns. This plan places the majority of the quota for 94 new homes on the east side of the village. Netherfield Lane is adjacent to the junction with Roydon Rd. (B181) and Hunsdon Rd. (B180), which is already listed as a traffic congestion area on HCC maps. It is estimated that the development will add 120+ vehicle movements per hour at peak times to this junction, on a dangerous bend with frequent accidents. Netherfield Lane is a narrow bridleway and wholly unsuitable for such a large-scale development. Bridleways under law cannot be driven over but this seems to be completely ignored.</p> <p>The solution seems to be to build a new exit road, but that is proposed on a dangerous bend, which is wholly inappropriate.</p> <p>3. Roydon Road and Marsh Lane regularly flood as water flows down from the higher land above. The green field that will be built on provides a large catchment area for rainwater to be absorbed. A significant increase in hard surfaces will inevitably exacerbate this. There has been no discussion on this and the plight of residents in Marsh Lane who have been forced out of their homes are likely to find this a regular occurrence.</p>	no change		SASM53		The quota is for a minimum of 94 homes in total. SASM H3 clearly states a quantum of 60 homes. EHDC responses do not state that other site proposals are unrealistic. The quantum of development is under the threshold for additional infrastructure. The Netherfield Lane site is an easy 10 minute walk to all village amenities so can hardly be said to be far.
				<p>The west side of the village has far better connections to trunk routes North, South, and West, and at some point, HCC's proposed Rapid Transport link. A more suitable site for development would be the land adjacent to St Margaretsbury sports ground. The site could better cope with the traffic and is closer to the shops, more bus services and the train station. It would be easy to create a number of access and exit points to major routes that would avoid the already congested traffic.</p> <p>The extra traffic if the Netherfield site were used would also add to the pollution in the village when the train barriers are down. Long tails of idling traffic already cause unacceptable fumes and this would be severely increased as all the traffic, probably well over a 100 cars would be joining the queue to the detriment of the villagers and the health of children in particular.</p> <p>The land to the West is THE only sensible option.</p>	noted		SASM53		H3 is well connected to many other routes out of the village and has good transport connections generally. The assumption in this comment is that every single household will drive to work through the village when it is equally likely that commuting traffic would choose the Roydon Road exit onto the A414 rather than be held up at the level crossing every day. The site to the west of the village is also Green Belt and was given full consideration through the site selection process, but eventually scored less well. The Amwell roundabout is already extremely crowded and dangerous.
SASM H3	Land east of Netherfield Lane/South of Roydon Road			<p>This plan identifies sites for 94 homes to be built in the village in addition to 15 already built over the plan period. Approximately 60 of those homes will be built on Netherfield Lane, an unadopted bridleway in the Green Belt. My concerns about the Netherfield Lane site are as follows:</p> <p>1. The District Council has said that development cannot be limited to a maximum of 60 homes, as the Neighbourhood Plan group have suggested, and they say that other site proposals in the plan seem to be unrealistic, so it is likely that the scale of development at Netherfield Lane will be bigger.</p> <p>2. The scale of development is wholly inappropriate at that end of the village, being furthest from amenities (shops, buses, trains and access to main roads).</p> <p>3. No infrastructure plans are in place to support the additional population – particularly primary school places (St Andrews is one form per year entry, with no space to expand) and NHS services (we have no local GP and the dentist is not taking new NHS patients). This means that people have to drive to facilities elsewhere.</p> <p>4. The impact this will have on traffic at the end of the village that is already impacted by speeding and accidents. There will be many more cars going through the rest of the village as a result (for the above reasons). The Parish Council's own traffic survey (commissioned in the light of the planned quarry, also at that end of the village) reflects these concerns. This plan places the majority of the quota for 94 new homes on the east side of the village. Netherfield Lane is adjacent to the junction with Roydon Rd. (B181) and Hunsdon Rd. (B180), which is already listed as a traffic congestion area on HCC maps. It is estimated that the development will add 40+ vehicle movements per hour at peak times to this junction, on a dangerous bend with frequent accidents. Netherfield Lane is a narrow bridleway and wholly unsuitable for such a large-scale development. The solution seems to be to build a new exit road, but that is proposed on a dangerous bend, which is wholly inappropriate.</p> <p>5. Roydon Road and Marsh Lane regularly flood as water flows down from the higher land above. The green field that will be built on provides a large catchment area for rainwater to be absorbed. A significant increase in hard surfaces will inevitably exacerbate this. The west side of the village has far better connections to trunk routes North, South, and West, and at some point, HCC's proposed Rapid Transport link. A more suitable site for development would be the land adjacent to St Margaretsbury sports ground. The site could better cope with the traffic and is closer to the shops, more bus services and the train station. The developers were also open to putting a primary school or other community facilities on the land. If a land swap was done with the sports ground (as has been proposed in the last), the benefit of an open aspect and less coalescence with Hoddesdon would have been retained.</p>	no change		SASM54		repeated comments



		<p>EHDC's District Plan includes the largest release of Green Belt land in England, representing over 6% of our Green Belt. Many of its other proposed Green Belt developments will have a direct impact on Stanstead Abbots:</p> <ol style="list-style-type: none"> <li>1. Gilston (Harlow North) Outline planning has been granted for a residential development of 8,500 houses. This will result in at least 17,000 additional private vehicles on our local roads in addition to home deliveries, with west bound journeys passing by or through our community.</li> <li>2. Village 7 This residential development of 1,500 houses will be less than 2 ½ miles to our east, creating yet more traffic through our village. Gilston and Village 7 at Hunsdon will, without doubt, increase the number of vehicles using the B180 and B181 to access westbound routes and stations at St Margarets and Roydon. Commuters are most likely to drive to St Margarets as there will be no new parking facilities at Harlow and they will prefer St Margarets over Roydon because Roydon is outside the TfL Oyster / contactless zone and the peak return fare to Central London is more expensive than from St Margarets. Amwell Lane and Lawrence Avenue residents are already under parking pressure and are at full capacity, exacerbated by commuter parking.</li> <li>2. The New Stort Crossings East Herts and Harlow Councils have approved the Central Stort Crossing and Eastern Stort Crossings. These will bring additional traffic from the new M11 Junction 7A, creating a new east-west link, which will move traffic past Harlow onto the A414, creating a west bound bottle neck at the Amwell Roundabout. Once backed up past the A414 Stanstead Abbots exit, the traffic will rat run through our High Street and local roads, grid locking our community.</li> <li>4. Briggens quarry The planned quarry will create 400 lorry journeys per day. The current plan is for the lorries to exit the site onto the A414 east bound, but when the Eastwick roundabout is removed this route will not work for west bound traffic. There is a strong chance that lorries will divert through Stanstead Abbots High Street. The site is very close to Netherfield Lane.</li> <li>5. Ware The Northeast Ware development proposes 1,800 houses, up 20% from the 1,500 detailed in the WARE2 master planning policy. Northeast Ware will be four miles to our north, with access from the new development to the B1004 at Widbury Hill into Stanstead Abbots for east bound traffic to the previously mentioned new developments, Harlow and the M11. These five schemes plus the Stanstead Abbots Neighbourhood Plan are only ever considered in isolation. The cumulative effect for our community will be significant and must be considered.</li> </ol>	noted		SASM54		outside the remit of the NP
		<p>Current national planning policy allows councils to remove land from the Green Belt when they are preparing new Local Plans only if they can show that there are "exceptional circumstances" for doing so. The release of the amount of Green Belt proposed by this plan for so little housing gain, when so many houses are planned on Green Belt land all around us, cannot be justified.</p> <p>I also object to closure of the online form for submission one day earlier than advertised in the hard copy booklet (midnight 2 April 2023).</p>			SASM54		Does not connect to the Green Belt; not considered as a protected view. Not publicly accessible land so not assessed as Local Green Space. District Plan policy VILL1 (iii) accepts the need to change the green belt boundary to accommodate an extension of the village to achieve the housing target. Refer to 3.8 Green Belt policy.
SASM H4	Land south of South Street	<p>I am in objection to the proposal due to the following reasons:</p> <ol style="list-style-type: none"> <li>1. South Street is already heavily congested, residents are unable to park due to increasing ownership of cars per household and due to those who reside/ work at the marina further utilising available parking.</li> <li>2. Existing parking would be lost to accommodate the proposed development, in which, will the parking for those existing spaces be relocated? It's essential the parking is not lost due to the inability for all existing residents to park as is.</li> <li>3. Further congestion is experienced down South Street due to daily deliveries for the Co-Op and those who shop on the high street regularly park along South Street, despite yellow lines. Barges and other boats are transported on a daily basis and further restrict access along South Street.</li> <li>4. The road floods on every occasion of heavy rainfall. Attendances by Thames Water and the emergency services are regular, in which access is restricted until resolved and properties flood. The last flood occurred 2022.</li> <li>5. The proposed location is of historical significance and contains Roman remains and residents have previously been informed building to the rear of 42 South Street is not permitted due to the requirement for preservation of the area.</li> </ol>	policy change	reduction in number of dwellings to 2	SASM55		



SASM H4	Land south of South Street		<p>I am in objection to the proposal due to the following reasons:</p> <ol style="list-style-type: none"> <li>South Street is already heavily congested, residents are unable to park due to increasing ownership of cars per household and due to those who reside/ work at the marina further utilising available parking.</li> <li>Existing parking would be lost to accommodate the proposed development, in which, will the parking for those existing spaces be relocated? It's essential the parking is not lost due to the inability for all existing residents to park as is.</li> <li>Further congestion is experienced down South Street due to daily deliveries for the Co-Op and those who shop on the high street regularly park along South Street, despite yellow lines. Barges and other boats are transported on a daily basis and further restrict access along South Street.</li> <li>The road floods on every occasion of heavy rainfall. Attendances by Thames Water and the emergency services are regular, in which access is restricted until resolved and properties flood. The last flood occurred 2022.</li> <li>The proposed location is of historical significance and contains Roman remains and residents have previously been informed building to the rear of 42 South Street is not permitted due to the requirement for preservation of the area.</li> </ol>	policy change	reduction in number of dwellings to 2	SASM56		
			<p>I have studied the Neighbourhood Plan and I congratulate the team on a splendid job carried out over a very long and difficult period. The requirement of East Herts District Council to add 10% new housing to the existing stock of 940 homes has created a need to think laterally and I am in agreement with all the chosen sites bar the one in Chapelfields where Network Housing applied for two new houses in an already congested area. Thankfully it has been refused. We live in a lovely village steeped in history and it is so important that its character is maintained whilst recognising that people need new homes to live in. What has been offered is considered and non-controversial and I thank Julia Davies and her team for a job well done.</p>	noted				