



Neighbourhood Plan for
Bishop's Stortford and Part of
Thorley Parish (1st Revision) –
Consultation Statement
Appendix 2

2021-2033

1. Table of Contents

1. Table of Contents 2
2. Consultation Log 3

2. Consultation Log

Ref	Name/Organisation	Comment	Action Taken	Reason
SLM1.1.1.2	Team Comment	Speaks of BSS and manor Links, BS South not in SLM, EOML has been taken out	Amended	Correction
SLM1.3.1.1.	Team Comment	Needs to state made date of original NP and be updated as to version	Amended	Correction
SLM1.4.3.2	Team Comment	Needs updating as regards ASRs	Setion already deleted	Duplicated information provided elsewhere
SLM1.5.8.2	Team Comment	Needs updating	Amended	Correction
SLM2.2.1.1	Team Comment	Need to explain how we have separated out the documents/created shared policies in this section, ie explain the basic documentary structure	Amended	Correction
SLM3.1.1.1	Team Comment	Need to explain 'designated locations'	Now explained in 2.2.1.1	Correction
SLM4.1.2.1	Team Comment	a further review of the neighbourhood Plan'	Amended	Correction
ACSP1.1.1.2	Team Comment	EOML is no longer present so should be deleted	Amended	Correction
ACSP1.3.1.1.	Team Comment	Needs to state made date of original NP and be updated as to version	Amended	Correction
ACSP1.4.3.2	Team Comment	Needs to state that there are no policies on EOML, and why	Amended	Correction
ACSP1.5.9	Team Comment	Need to be expanded	Amended	Correction
ACSP2.2.1.1	Team Comment	Need to explain how we have separated out the documents/created shared policies in this section, ie explain the basic documentary structure	Amended	Correction
ACSP3.1.1.1	Team Comment	Need to explain 'designated locations'	Now explained in 2.2.1.1	Correction
ACSP	Team Comment	Could we add a list of key/material changes	Added both SLM and ACSP 1.1	Provides further informaiton
BSS1	Team Comment	a) contains a split infinitive	Changed to 'Planning applications that propose to vary the approved Parameter plans materially that form part of the outline permission.....'	Incorrect grammar.
BSS1	Team Comment	and potentially an Environmental Impact Assessment (subject to confirmation of a Screening Opinion)' - clarify the conditions which trigger an EIA (is this screening?)	NOTED - suggest change 'Screening' to 'Scoping'	EIA's are normally required for all 'major' applications. An applicant may ask an LPA for a Scoping (or Screening) Opinion as to whether an EIA is required and what its scope should be under Part 4 (para.15) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 before making an application.
CC	Team Comment	Review policies in other areas, in particular housing, against the Climate change policies. Eg HDP3b may dilute the cc policy. Also in BSS (policy not stated)	text and/or policies in housing section need to reference climate change policies. Amend Housing section to add the following to the Introduction: 3.2.1.5 The policies on Housing & Design should be applied in conjunction with the Climate Change policies in the preceding section.	Housing section not updated in line with new climate change policies
ACSP4.1.2.1	Team Comment	a further review of the Neighbourhood Plan'	Amended	Correction
CC1	Team Comment	t should at a minimum contribute' is ambiguous.	NOTED	considered to be clear; essential to state what is the minimum requirement
CC2	Team Comment	Should this specifically mention Lited buildings (I originally proposed text which does this). Should there be some more caveats to prevent this policy being exploited for other purposes	CC3 changed to : a)Modifications to existing buildings the principal effect and purpose of which is to mitigate against climate change are supported unequivocally, unless the development can be shown to result in significant harm to the street scene or the amenity of neighbouring properties. b)For the avoidance of doubt the policy in a) applies to listed buildings unless the proposed development causes material and irreversible harm to the significant historical structure or to the historic appearance as viewed from the public highway. Harm to the appearance which is not readily visible from the public highway, reversible harm to the historic structure or harm to the parts of the building which are not of historic significance will not qualify as 'significant' harm other than in exceptional circumstances.	accept point made to protect listed buildings
SP3.2.2.9	Team Comment	Paragraph has no text	Amended	Correction
HDP2	Team Comment	Is 'Area Porposal' in a larger font?	No Change	All text shown as Calibri 11
SP3.4.3.5	Team Comment	clarify reference to BISH policies (which ones?)	SP3.4.3.5 amended to clarify specific parts of the policies referred to.	For clarity
GIP1	Team Comment	if I develop an area it is inevitable that the amount of green space (if we interpret that as any undeveloped space) reduces. So how do I measure 'green infrastructure' as opposed to green space more generally (which reduces). I think this needs to be cleae else this policy will be negated because it is objectively unachievable.	See item ref. no. 259 regarding changes to GIP1 addressing difficulty of interpreting percentage increase in green infrastructure.	See item ref. no. 259
SP3.4.4.2	Team Comment	The plans were made in 2015 and 2017 not as stated.	SP3.4.4.2 amended to correct dates	To correct error in dates
GIP2	Team Comment	3.1.1 Designated Locations' needs inverted commas	Inverted commas added to GIP2 text	For clarity
GIP2	Team Comment	as also required by East Herts District Plan policy CFLR2 Local Green Space). ' should not form part of the policy. It can be a footnote but not part of the policy	Comment moved to a footnote	The comment notes conformity with East Herts Policy but is not part of the NP policy
SP3.4.4.18	Team Comment	The stort is a globally rate habitat should read rare.	Spelling corrected	Correction was required
SP3.4.5.6	Team Comment	CMS is HCC not EHDC, suggest that the words say the HCC CMS	Herts County added to text	Correction was required
SP3.4.5.1	Team Comment	Castle park is East Herts in association with Bishop's Stortford Town Council	Reference to BS Town Council added	For clarity

Ref	Name/Organisation	Comment	Action Taken	Reason
GIP5	Team Comment	publicly owned land within Bishop's Stortford should be considered preferentially for siting of biodiversity offsets to provide the net increase required by clause e).'. Publically owned land is outside the control of the developer so they are unable to comply with this. Surely the way forward is to require S106 contributions for offsetting?	Text amended to clarify where biodiversity offsets can be provided. S106 contributions not included as an option to maintain requirement for physical measures rather than financial contributions.	This approach is consistent with East Herts District Plan Clause 20.3.12 approach to compensation for replacement habitats.
GIP5(i)	Team Comment	Second bullet has an unwanted bracket	Bracket removed	Correction was required
GIP6e	Team Comment	As part of any major development proposal, financial contributions or direct provision of new infrastructure will be' appears to be an instruction to the planning authority not the developer. You cant give an instruction to the planning authority. reqord as an instruction to the developer.	This policy was replicated from the 2015 and 2017 adopted Neighbourhood Plans. However the measures required have been amended to a similar form to that required by East Herts District Plan 2018 Policy CFLR3 Public Rights of Way.	To enable the policy to be applied
SP3.4.7.4	Team Comment	Precede by 'at the time of writing'	Caveat added	It is understood that the Town Council will review this policy
GIP8a	Team Comment	Mcu of this would seem to overlap/duplicate national policy, is it necessary? Also 'building development' is somewhat repetitive. Is 'development' sufficient and if not what distinction are you trying to draw?	Minor amendment to text	For clarity. East Herts District Plan 2018 makes no reference to the important role of the Lead Local Flood Authority in assessing, managing and advising on drainage and flood risk in relation to existing and proposed development. GIP8a) and b) emphasize this role and provide background for c) and d) which encourage developers to incorporate the wider benefits of green infrastructure into their drainage and flood risk mitigation proposals.
GIP8d	Team Comment	define 'large' in 'developers of large sites' - what does this mean?	'Large' omitted and additional text added to qualify when this policy would be considered applicable	For clarity
SP3.5.1.4	Team Comment	Figure 2 is below, suggest to delete reference to the relative location	Agreed	Delete reference
SP3.5.3.4	Team Comment	delete the word 'only', it appears to be a value judgement but adds no value	Not Agreed	The preceding 2007 DP contained 14 transport policies now reduced to 'only' 3 and now defers to the LTP on most detailed transport planning policies. The LTP is not part of the Development Plan - which the NP is. This justifies now having a more detailed suite of Transport policies in the NP.
SP3.5.3.7	Team Comment	3.5.3.7 Policy TP1 will therefore amend the existing approach - 'will' or 'does', 'existing approach' - what existing approach are you referring to?	NOTED	Refers to the approach of the current 'made' NP - to which this Reg14 Draft is a Revision (see preceding para 3.5.3.6.) Amend opening words to "Policy TP1 therefore amends the approach of the existing Neighbourhood Plan policy TP1 to require ..."
TP1	Team Comment	All major developments... ' My understanding is that Tas are only required for developments above a threshold which exceeds the threshold for 'major developments', is this trying to extend the scope of TAs?	Clarification to be added.	Major development is defined in the NPPF as housing developments of 10 homes or 0.5 ha or more or non-residential development of 1,000m2 or 1 ha or more and DfT's Guidance requires a TA or a <u>Transport Statement</u> for major developments - per TP1(a). In practice only "significant" developments (50 or over homes - not defined in the NPPF) need a TA. Text to be clarified.
TP1	Team Comment	The Transport Assessment and Travel Plan shall be carried out as part of the Masterplan process' - really, I would rprefer the developer to do it!	No action	The developer <u>does</u> prepare the masterplan (usually based on a TA) - but that's the problem not the answer! TP1(a) enforces the Masterplan <u>process</u> - as in DP policy DES1 - that masterplans should be prepared "collaboratively" including community stakeholders. It is this which delivers on para 3.5.1.6 aim that " <i>Neighbourhood Plan transport policies will encourage direct community collaboration in the earliest stages of masterplan-making, scoping of transport assessments and identifying mitigation measures .</i> "

Ref	Name/Organisation	Comment	Action Taken	Reason
TP1	Team Comment	including traffic surveys no more than 2 years old,' is too prescriptive. It may not be practical or necessary, and in the next couple of years will mean traffic surveys conducted during Covid.	No action - unless required by HCC Highways	The requirement for traffic survey data to be current is a major community concern because of the high impact of recent levels of development. The specification of a period is, by definition, prescriptive. 2 years is specified to ensure that a TA carried out for a significant development is based on original surveys conducted for that development during the application preparation period - as for other EIA requirements. Subject to HCC endorsement.
TP2a	Team Comment	The first part of TP2a adds no value as it merely requires that a policy in the District Plan be observed	No action	DP Policy EQ4 is referenced (without repetition of the 6 individual sub-policies) as a baseline before taking into account the emerging East Herts Sustainability SPD.
TP3	Team Comment	where possible' is weak and puts no onus on the developer to justify a decision not to conform. 'Unless demonstrably impractical' puts more onus on the developer.	Agreed	Text to be amended as suggested
TP3	Team Comment	In line with EHDC's Sustainability SPD, a maximum walking distance of 800m from Bishop's Stortford station is sought rules out any development more than 800m as the crow flies from the station. This is not a practical requirement suggest its deleted	No Action	NP should be compliant with very recently adopted standards of EHDC's Sustainability SPD - 800m walking distance of B/S Station. Standard is not mandatory but now requires applicant to comply "unless demonstrably impractical"
TP4d	Team Comment	missing full stop. Roadside parking is not a NP matter, its traffic regulation.	NOTED	Full stop to be added. Text to be amended to make presence of roadside parking a cycle route design matter.
TP4e	Team Comment	First sentence is not a neighbourhood planning matter it is traffic regulation.	No Action	The policy is about delivery of section 8 of EHDC's Sustainability SPD. If it's in an SPD it's a planning matter.
TP4g	Team Comment	Reference to designated locations needs clarity/correction/checking	Agreed	Checked and amended
TP5	Team Comment	Such subsidy should ensure that the service continues to run from commencement until beyond the full occupation of the development to be agreed with the planning and highway authorities doesn't make sense as written	Agreed	Delete "to be agreed with the planning and highway authorities."
TP5c	Team Comment	Facilities should read ', facilities'. 'to achieve' doesn't make sense in context	Agreed	Badly worded para - to be amended
TP6a	Team Comment	developer contributions specified within appropriate Planning Obligations such as S106, will be sought' is circular. The mechanism through which appropriate planning obligations are sought so this reads that the contributions specified in the specification will be sought.	NOTED - propose no change	TP6 (a) unamended from Schools Travel policy TP5(a) as approved in original NP2. Can't really see the problem
TP6b	Team Comment	any' includes 'all' so 'all' is redundant. Frinal bullet introduces a list but there is only one element in the list so the list is unnecessary, just run the text through	Agreed	Final bullet to be run through. Remaining text of TP6(b) unamended from Schools Travel policy TP5(a) as approved in original NP2. But amend as suggested
SP3.5.5.1	Team Comment	First sentence is awkward. Suggest to reword as 'In addition to high quality routes, high quality cycle parking	Agreed	To be amended as suggested
TP7a	Team Comment	Commas misplaced and policy generally confused wording. 'for users of developments for significant new developments' makes no sense and the following text is also unclear. This requires rewording	Agreed	Wording and punctuation to be amended
TP7b	Team Comment	Applies to major developments. Is this reasonable at the low end of 'major' (ie 10 houses)	No Action	Intention was specifically to apply it to all 'major' developments - which also includes non-residential development of 1,000m2 or 1 ha or more
TP7c	Team Comment	Appears to be an instruction to the planning authority which strictly you cannot give. Better re-written as an instruction to or a condition of development eg 'Developers will be expected to contribute to...	NOTED - Delete TP7(c) However, if this policy were seen as an 'instruction' to an LPA there is no such restriction on NP's (unless policies conflict with Strategic policies of the Local Plan) which, with the LP, make up the Development Plan. Arguably all NP policies are instructions to the LPA since only it can execute the DP.	Where a planning condition is an appropriate policy mechanism, it would be better written as a requirement to impose a condition if the LPA was resolved to approve an application (see for example TP1(f)). That said, this would probably not pass the strict tests on Planning Conditions. Therefore delete TP7(c)
TP8e	Team Comment	Applies to major developments (ie 10 houses), is this threshold unreasonably low. In a development where all units have parking within each residence, a charging scheme is unnecessary.	No Action	TP8 (e) only requires 'infrastructure' for present or future EV charging to be available on major developments.
SP3.5.5.10	Team Comment	The STT bid was unsuccessful, is this relevant here?	No Action	We think so. It provided evidence that EHC's publicly declared parking planning policies have changed irrespective of the outcome of the bid. The bid will be included in the evidence base.

Ref	Name/Organisation	Comment	Action Taken	Reason
TP9	Team Comment	First sentence is unintelligible, can you clarify what it means	NOTED	TP9 (a) unamended from Town Parking policy TP9(a) as approved in original NP2. Policy more intelligible when read in conjunction with new para's 3.5.5.10 - 11. Reluctant to change wording of complex and controversial policy already approved.
TP9a	Team Comment	provided by the car park owning authority or other owner.' - surely the developer should be responsible	Clarification to be added.	Statistics on existing usage only available from the car park owning authority or other owner. Add "...provided to the developer by the .."
TP9c	Team Comment	parking restrictions are not a matter for neighbourhood planning, delete	No Action	Policy TP9c is about town centre traffic demand management by supporting parking measures (including, inter alia, parking restrictions on new development). Definitely one of the most important issues for the NP.
TP10	Team Comment	Needs a threshold so that it applies only to larger developments (it makes no sense for minor developments). Suggest 'significant' is the appropriate threshold, or developments requiring a TA	Agreed	Add "Significant" as first word
SP3.5.7.6	Team Comment	Paragraph reads like a policy, is it needed?	Clarification to be added.	Was a policy in original NP 2. Revised list of supported projects, programmes and strategies not regarded as definitive enough to be Policy. Intro wording amended
TP12a	Team Comment	First sentence is unintelligible (too long) and appears to repeat District policy which is pointless.	Agreed - unintelligible	Not intended to repeat DEL1 - redrafted
TP12b	Team Comment	States what Councils will do which strictly you cant do. Developers will be expected to contribute to... is better	No Action - see response to comment 56 above.	Policy and wording recommended by Aecom
TP12	Team Comment	Appears to be redundant as currently drafted	Not understood - ? Comment applies to all TP12?	see responses to 64 and 65 above
SPFig 3	Team Comment	needs to be updated to show planned schools	Updated to include Avanti and new TBSHS sites	Update
EP7b	Team Comment	Appears to place a requirement on HCC not the developer (albeit that HCC might be the developer. Needs rewording slightly to make it clear that an assessment will be produced by the developer or similar	Amend text to incorporate idea	Comment is valid
HP1d	Team Comment	Doesn't makes sense in context	Text from 'designated locations' reincorporated into shared policies and reqorded so that it applies to both neighbourhood areas	
BP4	Team Comment	Relate exclusively to the Town centre. Suggest we either move to Town Centre section on put Town Centre policies in Business and Employment section	suggest move to Town Centre policies	They relate to matters concerning the Town Centre as outlined in the Town Centre Planning Framework
BP5	Team Comment	Relate exclusively to the Town centre. Suggest we either move to Town Centre section on put Town Centre policies in Business and Employment section	suggest move to Town Centre Policies	They relate to matters concerning the Town Centre as outlined in the Town Centre Planning Framework
TC2	Team Comment	Second sentence commencing Before - Before doesn't make sense/gramatically incorrect in context, should full stop be a comma?	Amend textand after the word site replace the full stop with a comma, with the word before starting with a small b and put a comma between place and to.	to make it read as originally intended.
Town Centre	Individual Comment	<p>I am commenting by email because your preferred method of consultation does not include in the form the subject area on which I wish to comment. My post code is CM23 5NW.</p> <p>The policy on which I wish to comment is Policy SCLP4(a). Although this is described as a shared policy rather than a site specific one, it is plainly site specific. The town has an existing arts centre, the Southmill Centre, which falls within the area covered by this plan. The only available central location for a new, larger arts centre is at Old River Lane, which falls outside the area of this plan. The suggestion that the town needs a new, larger arts centre has never been supported by any evidence of sufficient demand to make it viable. Indeed with the Harlow Playhouse to the south of the town and the Saffron Hall to the north, both a short journey away, it is difficult to see what such a venue could offer in preference to either facility, quite part from the more extensive entertainment offers in London and Cambridge. Whatever, its shortcomings, a smaller sum of money spent on improving the Southmill centre would be a better investment than a brand new facility which, even before the pandemic, was unlikely to be fully used. This appears also to be the conclusion now reached by East Herts Council and its preferred developer.</p> <p>The policy should therefore be removed from the plan for all the above reasons. Policy SCLP4(b) remains appropriate and should be retained.</p>	NOTED - This is basically covered by TC2, both the Old River Lane Development and the South Mill Arts Centre come within the extended Town Centre boundary provided for in the Bishop's Stortford Town Centre Planning Framework .	TC2 allows for proper consultation on Old River Lane
PM	Team Comment	Index needs sorting	Table Updated	Correction
PM	Team Comment	Landscaped Garden at Mercer;s Avenue, St Michael's Mead, Thorley - intruding ;	Amended	Correction
PM	Team Comment	Green Space at rear of Northgate Multi-Storey Car Park *Under Construction) (1:1250) - is this area actually accessible to the public?	Question NOTED. The area is not accessible by the public at present as it is part of the construction site but once the new East Herts Council car park comes into operation it will be accessible to the public from the rear external parking area.	This is a question not a comment

Ref	Name/Organisation	Comment	Action Taken	Reason
Climate Change	Individual Comment	<p>Does the climate neutral pledge apply to the new developments around Bishops Stortford or does this neighbourhood plan start conveniently after thousands of new houses have been built and are still being built around the town with no sign of a solar panel in sight?</p> <p>Do you talk to developers about these things?</p> <p>I know it's been a wet season but is the very evident flooding around, especially on Grange paddocks ,as a result of the concrete covering fields around where water would have soaked away?</p>	NOTED	The policies will take effect when the revision of the neighbourhood plans has been 'made' and will then apply to new planning applications. The policies cannot be applied retrospectively.
Transport	Individual Comment	<p>I wanted to share a survey I carried out last year, just before the lockdowns, which received feedback from 376 parents who live in Bishop's Stortford and who's children attend various school in the town. The survey was conducted as part of a campaign for a crossing on Hadham Road, but gives extensive and detailed feedback on the barriers to parents allowing their children to walk to school, across the town.</p> <p>The results show detailed feedback on the barriers to walking to school, the most significant of which are road safety and in particular children crossing roads and footpath safety, including narrow footpaths, unlit footpaths and the weight and speed of traffic next to footpaths.</p> <p>I believe a lot more can be done in Bishop's Stortford to reduce/not increase the number of cars on the road in Bishop's Stortford, if a well thought out plan could be developed and adopted. This would of course improve air quality and East Herts' contribution to climate change. It would also contribute positively to children's development by enabling them to be more independent.</p>	NOTED	Policy TP3 is designed to increase the attractiveness of walking and cycling and prioritise pedestrian and cyclist routes between housing areas and community facilities - including schools. TP6 specifically promotes Safer school travel including street design measures in the vicinity of schools to improve the safety of children traveling to school on foot and by bike.
Education	Individual Comment	<p>I wanted to share a survey I carried out last year, just before the lockdowns, which received feedback from 376 parents who live in Bishop's Stortford and who's children attend various school in the town. The survey was conducted as part of a campaign for a crossing on Hadham Road, but gives extensive and detailed feedback on the barriers to parents allowing their children to walk to school, across the town.</p> <p>The results show detailed feedback on the barriers to walking to school, the most significant of which are road safety and in particular children crossing roads and footpath safety, including narrow footpaths, unlit footpaths and the weight and speed of traffic next to footpaths.</p> <p>I believe a lot more can be done in Bishop's Stortford to reduce/not increase the number of cars on the road in Bishop's Stortford, if a well thought out plan could be developed and adopted. This would of course improve air quality and East Herts' contribution to climate change. It would also contribute positively to children's development by enabling them to be more independent.</p>	NOTED	Transport policies already require thorough transport assessments and walk to school assessments to the extent reasonably possible in NPs
Green Infrastructure	Individual Comment	<p>To save time repeating my (and others) objections to the many problems the new development at Whittington Way and the flow of traffic, or rather the lack of traffic flow if the road proposals go ahead, I enclose e-mailed correspondence for your information regarding a serious issue regarding traffic flow should the proposals go ahead.</p> <p>On a slightly less serious but highly important matter you will also note that contrary to your leaflet "Green Infrastructure" that good agricultural land and habitat for wildlife is being destroyed in this new development, but hopefully the small strip of land to the right of Whittington Way (as you drive up the hill from the existing traffic lights) and which is parallel to Thorley Lane will remain untouched as this is the very last piece of land left to wildlife.</p>	NOTED.	The development referred to already has outline approval for the development as a whole and approval in detail for part. The approvals include the main access infrastructure and parameter plans for land use and green infrastructure. The revised Neighbourhood Plan cannot be applied retrospectively to this development. The approved access arrangements include a new roundabout on Whittington Way and new footpaths. These works will encroach on the undeveloped strip of land on the north side of Whittington Way (the right side as driving up the hill) but the greater part of the strip will remain and will obtain the protection of 'Other Green Areas' afforded by policy GIP2c) in the revised NP.

Ref	Name/Organisation	Comment	Action Taken	Reason
Site specific policies (policies BSHS, BSS and GY)	Individual Comment	<p>Further to recent articles in Facebook regarding the current plans for the town. I have clicked on the link so that I can comment, as I have filled in online surveys before but they are a complete waste of time, as there is only set questions to answer and nowhere for comments.</p> <p>I have been a resident for 35+ years and this once lovely market town has been completely ruined by the incessant building of new estates and flats in recent years. It doesn't seem to matter how much objection there is from residents, the plans get the go ahead anyway. To say that I and everyone I know locally are angry about this is an understatement! A point in case is the horrendous building work going on along Whittington Way and Obrey Way, the lovely views and so many trees have disappeared, not to mention the awful gridlock of traffic, noise and pollution it will cause. The town is fast becoming a concrete jungle, and not the rural town it was. This needs to STOP!</p> <p>Any further planning should be completely stopped, and go elsewhere. I strongly believe that to be a councillor involved in planning, they should have to be a resident and stay so, to get the job, as I'm sure many of these people are not affected by all this building as there do not live in the town. Scandalous!!!</p> <p>I'm sure my objections along with many many others will be ignored again, and probably not even a response.</p>	NOTED. All planning applications are decided by EHDC who must take into account the District Plan and Neighbourhood Plan policies.	Great care was taken by the NP teams to take into account the views of the residents and we had to minimise any adverse impacts of future developments and try to influence positive ideas.
Transport	Individual Comment	I have been a resident for 35+ years and this once lovely market town has been completely ruined by the incessant building of new estates and flats in recent years. It doesn't seem to matter how much objection there is from residents, the plans get the go ahead anyway. To say that I and everyone I know locally are angry about this is an understatement! A point in case is the horrendous building work going on along Whittington Way and Obrey Way, the lovely views and so many trees have disappeared, not to mention the awful gridlock of traffic, noise and pollution it will cause. The town is fast becoming a concrete jungle, and not the rural town it was. This needs to STOP!	NOTED – The Transport policies in the NP have been amended to better address the traffic impact of development.	The allocations of sites for development – such as Whittington Way – were made by EHC in the District Plan. The Neighbourhood Plan cannot change these but can require the impacts to be properly assessed and where necessary mitigated.
Health	Individual Comment	Bishops Stortford is at bursting point, and the infrastructure cannot and will not cope! There isn't even a hospital with a proper A&E here for the ever growing population, not to mention doctors surgeries!	NOTED	This does not suggest a policy change and it would be inconsistent with the basic conditions to prevent development in the District Plan
Transport	Individual Comment	The flyer which landed on my mat this morning from Bishop's Stortford Town Council entitled 'Shape The Future of Bishop's Stortford' had me spitting feathers. This town plan 'limited revision' of the 2015/2017 versions is all years too late - not only did councillors miss the boat big time - its already arrived at its overdeveloped, polluted congested destination despite all the intensive lobbying/ protests of local residents over the years. 'Greater community participation' is referred to as the 'new approach'. Is this some sort of sick joke?	NOTED – The Transport policies in the NP have been amended to better address the traffic impact of development and introduce more community participation	The allocations of sites for development were made by EHC in the District Plan. The Neighbourhood Plan cannot change these but can require the impacts to be properly assessed and where necessary mitigated. TP1 requires Transport Assessments to be more open to community scrutiny.
Site specific policies (policies BSHS, BSS and GY)	Individual Comment	<p>I recently received a leaflet entitled Bishop's Stortford Neighbourhood Plan which said that 'Neighbourhood Planning is the way for the local community to have a direct say in development'.</p> <p>Is this an early April Fool's Day joke?</p> <p>For years local residents have signed petitions and rigorously opposed the proposed Bishop's Stortford South development. As I understand it, Bishop's Stortford Council opposed it, too. But, hey! It's going ahead anyway because Hertfordshire County Council doesn't care. It rides roughshod over the wishes of Bishop's Stortford's local community. It seems that the best we can hope for with any new development is to postpone the inevitable.</p> <p>As far as I can see Bishop's Stortford Council and the residents of Bishop's Stortford are impotent to resist the powerful bully that is Hertfordshire County Council. Our Market Town is being destroyed. What are you going to do about it other than talk?</p>	NOTED. All planning applications are decided by EHDC who must take into account the District Plan and Neighbourhood Plan policies.	Great care was taken by the NP teams to take into account the views of the residents and we had to minimise any adverse impacts of future developments and try to influence positive ideas. EHDC are given housing targets by central government and although residents object we cannot stop these developments.
Transport	Individual Comment	<p>I am a local resident who is increasingly worried about the speed this town is growing and I would stringly encourage the plan to consider how to best support walking and cycling in BS.</p> <p>There are 3 stretches that would encourage more people to walk and cycle into town, but either there is no path, or the mud makes it non-transitable.</p> <p>Considering these paths would directly lead to areas where houses have just been built, it should be a priority to ensure pedestrian paths are in place.</p> <p>The 3 areas are:</p> <ul style="list-style-type: none"> * A small section in the public right of way going from Hillmead School/Bishop's Park area through BS college (picture 1 attached) which falls under private land. * A small stretch on Handham road from Pye Gardens to Maze Green Road which is currently full of trees - it would be helpful to 	NOTED - pictures supplied have been recorded and reviewed.	The Transport analysis and policies of the NP are driven primarily by the need to address the traffic impact of new development in the town - through the revised policy TP1 - and to prioritise sustainable travel modes - walking, cycling and buses - in policies TP3, 4 and 5 - focusing in particular on better non-car connectivity from the development areas. The three examples cited have been NOTED but the NP does not identify specific example of where these policies may be applied.

Ref	Name/Organisation	Comment	Action Taken	Reason
Green Infrastructure	Individual Comment	Over the last few weeks I have been trying to send the attached pdf letter to Councillor Keith Warnell for consideration in the Neighbourhood Plan. For various reasons, despite everyone's best efforts, it does not seem to be sent successfully. Can you please ensure he receives this, as well as whoever is appropriate for the purposes of the current Plan review. Can you also please confirm safe receipt (at last?!) RECEIPT SENT	NOTED. The correspondence was received by Councillor Warnell and concerned Mr Cockburn's proposal for a change in the boundary of the green belt to allow a new dwelling to be built at the southern end of Meadowlands. The proposal included creation of a new pedestrian access route to the town meads from Rye Street across Mr Cockburn's plot.	This is a District Council matter. Mr Cockburn was advised that the need to change green belt boundaries could only be undertaken in exceptional circumstances, if fully evidenced and justified, through the strategic policies of the District Council (NPPF Clause 136) and therefore in the first instance he should talk to East Herts if he wished to pursue the proposal. Planning permission for a new dwelling is also a District Plan matter. The proposal for a new access to the town meads was considered likely to run into difficulties due to landownership issues and there are existing access points not very far away.
Town Centre	Individual Comment	Thanks to all involved for the work that goes into them - the objectives are good I think Bishops Stortford can be especially proud of its creation and maintenance of the green spaces linking the urban areas into them However my reservations on the plan as a whole are that the final arbiters of what is to be allowed is the East Herts Council and they have a unenviable track record of ignoring what is in any plan when it does not suit them. Their acting like they do tends to demotivate people in responding to these well intentioned exercises. The colossus which is the Northgate end car park is a case in point and was never in any plan. There is an increasing case for Stortford as the biggest town in the area becoming a unitary authority so it gets what it wants and the townspeople will think they do have some influence.	NOTED - By coming after the District Plan notice has to be taken and as to Bishop's Stortford becoming a Unitary Authority, unfortunately the minimum size for proposed new Unitaries is a population of at least 300,000.	
Town Centre	Individual Comment	Any comments would be a waste of time. The council has taken no notice of comments from locals in relation to any development in Bishop's Stortford. Examples include; the Station yard project- no changes in light of overwhelming issues raised during so called 'open meetings', Thorley/Whittington way project - building on this site started before formal planning permission was agreed. I could give other examples but won't.	NOTED-	Purely a complaint
Business and Employment	Individual Comment	In all larger developments it should be a planning requirement that a small hub of shop units (say 3-5 in number) be provided for lease/rent. Reason / in the lockdown these were very useful - ie at Havers and Snowley Parade in fulfilling local immediate smaller shopping needs. They reduced traffic and avoided longer journeys into Town and could in many cases they were within walking distance - avoiding car use altogether	NOTED	TP3 already specifies maximum walking distances between dwellings and facilities including shops.
Green Infrastructure	Individual Comment	I wonder if someone there has any information about the allotment site that is meant to be part of the Stortford Fields development? I have tried to contact those who are responsible for overseeing the development and I emailed them a couple of times last year but received no response. That email address has now closed down with new ones published that relate to the actual house developers rather than the wider development. I would appreciate it if someone could point me in the right direction.	NOTED. Information on who to contact to find out more about the status of the proposed allotments for Stortford Fields was emailed to Liz Ward on 15 April 2021.	This is a request for information on the Stortford Fields development which already has planning permission and is under construction. The revised Neighbourhood Plans will not therefore apply to this development.
Green Infrastructure	Individual Comment	In reference to your leaflet please may I request <u>no</u> trees or bushes to be cut down or destroyed. Please can you plant lots and lots more trees all around Stortford for our wildlife, the birds and insects. Please keep areas wild, not clean cut grass, for the hedgehogs. We released over 12 last year as we are part of Herts Hogline and have five more to release this spring. (We would love a hedgehog crossing down our road to stop them from being run over please). No more plastic grass in people's gardens and encourage fences for hedgehogs and bird boxes, but boxes all around Castle Gardens. A lovely meadow of wild flowers for the bees and butterflies. No more concrete roads or pavements. Green space, wild and simple. No more spraying pesticides on sides of paths, it kills everything.	Clause GIP5d) amended to include reference to hedgehogs. (It is really good to see your interest in wildlife, Daisy and Poppy. The revised Neighbourhood Plans encourages an increase in all forms of open areas and wildlife habitat including trees and hedges. But it is sometimes necessary or indeed beneficial to fell some trees, for example as part of woodland management to allow other plants to grow. And we have to take into account that open areas are used for all sorts of purposes, such as for playing games, and to try and balance the needs of all. We hope that you will pass on your ideas for Castle Park to the Friends of Castle Park group who are working on improvements to the park. You can find them on facebook. But we are sure you will be pleased that we have added hedgehogs to the species mentioned in GIP5d) to encourage developers to take them into account.)	The revised Neighbourhood Plans seeks to achieve an increase in green infrastructure and wildlife habitat, for example in policies GIP1, GIP2 and GIP5 but is strengthened by adding reference to hedgehogs in GIP5d).
Climate Change	Individual Comment	Require most new developments" is a leaky bucket of a suggestion. It must be made specific to achieve any gains at all. If one major development were to be the only development not to be carbon neutral every other gain would be in vain. Very weak section, needs to be bold, confident, ambitious.	NOTED	Policy CC1 states 'every development'
Housing and Design	Individual Comment	All new housing must achieve carbon neutrality. Do not back down with late changes after approval.	NOTED	changes will only be made if the Examiner requires them

Ref	Name/Organisation	Comment	Action Taken	Reason
Green Infrastructure	Individual Comment	Access around the various neighbourhoods must be practicable on foot or cycle. For example, for a child to get to school from one side of town to the other safely.	NOTED. The revised Neighbourhood Plans encourages provision of safe pedestrian and cycle routes. Policies to this effect can be found in the transport and green infrastructure sections: in the latter, GIP6 in particular. But the Neighbourhood Plans only apply to new development and cannot address the many locations across the town where existing paths might be considered unsafe for children. One place where existing deficiencies can be reported is at www.widenmypath.com	The revised Neighbourhood Plans support the provision of safe pedestrian and cycle routes for new development, for example in Green Infrastructure policy GIP6.
Town Centre	Individual Comment	Rethink the Old River Lane site -- we already have an under-used cinema, and increased home-streaming may reduce cinema audiences in any case. Some of the station car park should provide cheap off-peak parking for South Mill Arts. The Good Yards Site combined with SMA could provide an excellent cultural/retail hub with good transport links.	NOTED - TC2 covers this	TC2 requires proper consultation
Site specific policies (policies BSHS, BSS and GY)	Individual Comment	Any comments would be a waste of time. The council has taken no notice of comments from locals in relation to any development in Bishop's Stortford. Examples include; the Station yard project- no changes in light of overwhelming issues raised during so called 'open meetings', Thorley/Whittington way project - building on this site started before formal planning permission was agreed. I could give other examples but won't.	NOTED. All planning applications are decided by EHDC who must take into account the District Plan and Neighbourhood Plan policies.	Even if Bishop's Stortford Town Council refuse planning permission it can still be granted by East Herts District Council who have to take into account the District Plan and Neighbourhood Plan.
Climate Change	Individual Comment	The statement is not strong enough - more needs to be done.	NOTED	The policies have been written to provide a balance between strong action and reasonableness in the light of NPPF and District Plan policies
Climate Change	Individual Comment	All looks good.	NOTED	comment supports policies
Transport	Individual Comment	Please please please reduce the impact of traffic on the town centre. There should be no through traffic along the high street part of south Street. The current set up is a joke and is abused which puts people in danger. Rather than allow access out the other end, either turn everyone up Apton Road near Cafe Nero or require a pass card to get through a barrier outside the Youth cafe. This works in other cities. It is really bad and makes me so mad when I ask people why they are driving down there and they say its not illegal: it should be illegal. We can provide "adequate parking" and "promote sustainable modes" and "safety" but the best solution for the health of the centre would be closing off traffic between 10am and 4pm Monday through Saturday.	NOTED. Design and enforcement of traffic management is an HCC Highways responsibility.	The objective of Policy TP4 is to reduce traffic in and through the Town Centre and supports the principles of pedestrian priority and improvements. TP 10 reduces traffic speeds.
Education	Individual Comment	Looks fine	NOTED	
Climate Change	Individual Comment	Climate change is not a fact. Why have we had the coldest winter in 26 years as of now. UK produces very little in the way of impacting on the world climate - fact. India and China are the problem.	NOTED	no revision necessary
Housing and Design	Individual Comment	Need to ensure that ALL new properties have appropriate parking (many occupations require own transport - eg community based health and social care staff, plumbers, electricians, home decorators etc, those who inspect premises, teachers who live in an affordable housing area, but work where cannot afford, those who work "anti-social" hours,. Also, housing needs to appreciate that most households often need more than one car for work purposes (not just to get to/from work) and unless 365/24 bus services very difficult to have any form of "life" without a car.	NOTED	Parking standard for residential properties are covered in detail in TP8, Non residential parking is covered in TP9 and BP1
Climate Change	Individual Comment	Pleased to see climate change prioritised particularly in relation to housing design standards	NOTED	supportd policies
Transport	Individual Comment	3.5.6 Pleased to see 20 mph being considered for new estate roads. Traffic calming measures are proposed as a way for this to be enforced. It is my experience that the speed bumps in Rye Street slow only some of those driving small cars. The remainder, which is the large majority are still doing at least 30 mph. Also, for cyclists to feel safe, the roads also need to be kept in better condition i.e. pot hole free	NOTED. Design and maintenance of traffic calming measures and roads is an HCC Highways responsibility	Supports policy TP10
Business and Employment	Individual Comment	The vibrancy of Bishops Stortford is increased with the presence of the market. There was very little in the plan about supporting this.	NOTED	For the most part this is not a matter for Neighbourhood Plans. The exception to this is where change of use might be required to allow the market to move to another location, this is not thought to be a problem with existing policies
Climate Change	Individual Comment	Most important aspects: provision of non-polluting buses to improve air quality; all new housing and commercial developments to have solar panels, sustainable/district heating systems.	NOTED	It is not possible for the NP to make solar panels compulsory
Housing and Design	Individual Comment	All new developments to have solar panels, sustainable heating systems.	NOTED	It is not possible for the NP to make solar panels compulsory
Green Infrastructure	Individual Comment	Safer walking and cycle routes. More trees, more recreational green spaces.	NOTED.	See response to consultation reference 95 above regarding safer walking and cycling routes. The revised Neighbourhood Plans seek to encourage enhancement of green infrastructure including green spaces, trees and hedges associated with new development. Requirements for spaces for open space, sport and recreation are also covered by Policy CFLR1 in East Herts District Plan October 2018.
Transport	Individual Comment	Safer walking and cycle routes. More trees, more recreational green spaces.	NOTED	Supports Policy TP3 and GIP2
Education	Individual Comment	Discouraging short journey "school runs". Development of school sports and leisure facilities for extended use by general public.	NOTED	School runs covered by EP5, use of school facilities by public covered by SLCP3b

Ref	Name/Organisation	Comment	Action Taken	Reason
Health	Individual Comment	Greater use of Herts and Essex Hospital for local use, but maintenance of town-centre GP surgeries vital.	NOTED	Not a matter for neighbourhood planning
Business and Employment	Individual Comment	Free, frequent park and ride electric buses for town-centre workers.	NOTED	Frequent park and ride buses for town-centre workers and the use of EVs are supported by Policy TP4. Private or public services are not expected to be free but the policy supports deficit funding where there are social benefits.
Town Centre	Individual Comment	Please do not invest blindly any further sums into our town centre without proper consultation with local people and businesses/organisations. We really do know what we would like to see in the town and what services we would like invest in, so please ask those who are here rather than knee jerk to the call of others with authority outside the town.	NOTED - The District Plan requires the Bishop's Stortford Town Centre Planning Framework to be made into a Supplementary Planning Document which would require proper consultation	
Site specific policies (policies BSHS, BSS and GY)	Individual Comment	There is a huge pollution/congestion problem at the Hockerill Traffic Lights, which is also a necessary but dangerous place for pedestrians to cross the roads. Serious thought should be given to making this whole area a shared space, giving priority to pedestrians and cyclists. Such a scheme could discourage cars and commercial vehicles, forcing them onto the bypass and thereby achieving better air quality, less congestion and a safer pedestrian/cycle route into town.	NOTED	The justification for policy TP2 on Improving Air Quality specifically references the Hockerill AQMA. Policy TP4 is designed to support pedestrian and cyclist priorities in the Town Centre and for routes into town - including shared space solutions.
Climate Change	Individual Comment	In the proposals we found nothing surprising and support what we know of the plans here.	NOTED	comment supports policies
Housing and Design	Individual Comment	In the proposals we found nothing surprising and support what we know of the plans here.	NOTED	No action requested
Green Infrastructure	Individual Comment	We support the plans in securing of Local Green spaces.	NOTED	Policy GIP2 designates additional green spaces
Transport	Individual Comment	We are very concerned about the increase in housing in the area and the lack of increased provision to accommodate the additional traffic and resulting air pollution this will generate.	NOTED	The allocations of sites for development were made by EHC in the District Plan. The Neighbourhood Plan cannot change these but can require the impacts – including air quality impacts - to be properly assessed and where necessary mitigated. Supports Policy TP1 and TP2
Climate Change	Individual Comment	I believe all development - especially new build should comply with a minimum of carbon neutral in their build. The use of renewable energy sources should be mandatory.	NOTED	comment supports policies
Housing and Design	Individual Comment	I believe all development - especially new build should comply with a minimum of carbon neutral in their build. The use of renewable energy sources should be mandatory	NOTED	repeat of previous comment
Green Infrastructure	Individual Comment	All areas identified by this town plan and local district plan as a local green space/green wedge or finger must be preserved going forward. No erosion of these spaces should be allowed for any residential or development use. Anybody removing trees/bushes etc without a prior certificate of danger should be held accountable in law. No allowances should be made under any circumstances to remove any tree or woodland piece without prior approval for an emergency reason.	NOTED.	Policies GIP2 and GIP5 seek to preserve local green space and existing trees and bushes within the scope of a neighbourhood plan. The Local Green Spaces designated in the revised Neighbourhood Plans are protected in the way provided for in the NPPF and District Plan 2018. Felling of trees is sometimes necessary and can be beneficial, for example as part of woodland management to encourage other species. However policy GIP5a) seeks to protect mature trees and hedgerows where possible.
Transport	Individual Comment	Traffic is appalling in and around BS. The numbers of cars on the roads has not reduced despite transport strategies being employed to do so. The roads are simply not fit for purpose for cycle lanes, increased width pavements and bus lanes. The only way to stop more cars coming onto the network is to stop new build development in the town.	NOTED	The allocations of sites for development were made by EHC in the District Plan. The Neighbourhood Plan cannot change these but can require the impacts – including those in the London Road Corridor - to be properly assessed and where necessary mitigated and capacity for walking and cycling created. Supports Policy TP1 and TP4
Town Centre	Anonymous Comment	Larger town , therefore expand Herts & Essxe	NOTED	
Town Centre	Anonymous Comment	Attract market stall holders. Too many have given up on us - look at Saffron Waldon, Ely, Hertford. Pedestrianised and encouraging of local businesses.	NOTED	
	Anonymous Comment	Start by reading Doughnut Economics by Kate Raworth and be ambitious. We don't have to have our heads in the sand, or wait for others.	Noted	This does not appear to be related to Neighbourhood Planning
Green Infrastructure	Anonymous Comment	A concentrated effort not to just plant trees but also bushes that provide nectar for insects.	NOTED.	Policy GIP5 encourages provision of a variety of habitats to increase biodiversity.
Green Infrastructure	Anonymous Comment	All houses should have sufficient garden space - for children to play, occupants to be able to have their own garden space for leisure and gardening.	NOTED.	The density, type and mix of housing, including space for private gardens, and the provision of space for children to play is addressed in East Herts District Plan 2018.
Climate Change	Anonymous Comment	ALL new builds large or small MUST include green energy of some sort. It's not difficult to fit during a new build solar panels - so there's is no excuse not to include them. Yes it pushes up the build cost but the savings for those who occupy the building and reduction of pressure on our environment is worth it.	NOTED	comment supports policies

Ref	Name/Organisation	Comment	Action Taken	Reason
Climate Change	Anonymous Comment	ALL new builds should be built with the environment in mind. For example the car part by the station should have solar panels on it, a living wall to soak up the CO2 from the cars that use it.	NOTED	comment supports policies
Climate Change	Anonymous Comment	All new housing can only be given the go ahead if the developers guarantee to include energy saving devices/ materials e.g. ENERGY STAR windows, rainwater harvesting systems etc.	NOTED	comment supports policies
Green Infrastructure	Anonymous Comment	All of these measures will go some way too negating the lost of habitat.	NOTED	Policies GIP1 and GIP5 seek to provide enhancement of green infrastructure and wildlife habitat
	Anonymous Comment	All this does is drive up the cost of every building.	Noted	This does not appear to be related to Neighbourhood Planning
Health	Anonymous Comment	Also need to take account of fact that many elderly need lifts to get to the shops, medical and other healthcare appointments etc."	NOTED	Provision of public transport, to the extent that it is a matter for neighbourhood Planning, covered by TP5
Green Infrastructure	Anonymous Comment	Also the development must include things such as holes in fences for hedgehogs (now a red listed species), trees and bushes to provide flowers for insects in the spring and summer and berries for the birds in the winter.	Policy GIP5 d) amended to include reference to hedgehogs in addition to bats and birds.	To help counter the decline in hedgehogs.
Green Infrastructure	Anonymous Comment	Also when habitat is destroyed during redevelopment/new build that those profiting from this must cover the cost of 'replacing' what they destroyed. And this means actually planting appropriate plants at the right time of year and cover the cost of care for the area until it is established so we don't end up with an area full of dead tress. "	NOTED.	There are a range of Government regulations providing protection for wildlife and habitat, for example the Wildlife and Countryside Act 1981, the Conservation of Habitats and Species Regulations 2017 and tree preservation orders in the Town and Country Planning (Tree Preservation((England) Regulations. Requirements regarding maintenance of new habitat are usually set out in planning obligations and conditions, for example, as described in section 20.3 and Policy NE3 Species and Habitats of East Herts District Plan 2018.
Town Centre	Anonymous Comment	The new plan B of building a cinema needs to be put on hold until the original plan can be reviewed. The town has a cinema - what was planned would give our town centre it's soul back (giving the community somewhere to meet) a cinema is unlikely to do that.	NOTED	TC2 covers this point
	Anonymous Comment	Don't follow the Woke Bible.	Noted	This does not appear to be related to Neighbourhood Planning
Transport	Anonymous Comment	Drastic changes to the town are need to happen to release the congestion on Whittington Way, London Road and Hockerill traffic lights.	NOTED	Agreed - see sections 3.5.1 -3.5.3
Transport	Anonymous Comment	Electric cars run on electricity which has the same cost if not more as carbon fuels. Not affordable to most.	NOTED	Transport policies support LTP and NPPF policies to promote use of EVs
Transport	Anonymous Comment	Encourage physical activity in conjunction with daily activities. The ability to walk to and from shops, school, work makes us and the environment healthier.	NOTED	Policy TP3 supports walking and cycling for healthy lifestyle as well as transport reasons.
Green Infrastructure	Anonymous Comment	Every new home must include correctly installed bird/bat boxes.	NOTED.	Installation of bird and bat boxes is sought in GIP5d) and is supported by East Herts District Plan 2018 policy NE3 Species and Habitats. However it may not be appropriate for all dwellings.
Transport	Anonymous Comment	Fares have to be at a level that costs less for a family of 4 to do return journey to ANY part of the town than petrol and 1 hour parking to enable people to rely on it.	NOTED	Bus fares are not a planning issue
	Anonymous Comment	Fine but it should not cost a fortune. This is a luxury.	Noted	This does not appear to be related to Neighbourhood Planning
Site specific policies (policies BSHS, BSS and GY)	Anonymous Comment	For this reason we are very concerned about the development to the south of the town.	NOTED	
Transport	Anonymous Comment	Great to see that places for walking and cycling are being considered. But not at the cost of ripping up our hedgerow etc. which seems to be the way this is being achieved at the moment.	NOTED - presumed to be reference to removal of hedgerows at Whittington Way to provide cycleway.	Design/location of cycle way at Whittington Way approved by EHC as part of Hybrid application for BSS. Policy TP1 seeks to strengthen community engagement in masterplanning of developments.
Transport	Anonymous Comment	If really want to ensure that people start using buses more - bearing in mind Bishop's Stortford is not flat and for estates such as St Michael's Mead a walk into town centre is 30 minutes downhill and 40 minutes uphill (with 3 very steep hills) so not possible for the elderly, anyone carrying other than very basic shopping, need to have an efficient, and inexpensive bus service that runs every day (including Sundays so everyone can get to any of the local church services) and not just from "their area" to the Station hub, but between areas - eg if have to wait up to an hour for a bus to town centre, then up to an hour for a bus to another outer part of the town, no incentive when takes 10 minutes by car (for a walk of an hour) and can be done any time of any day.	NOTED	Policy TP5 supports similar objectives deliveed through HCC's Intalink Bus Strategy and developer contributions
Transport	Anonymous Comment	In as planning consultation we were told by a planning representative that a change in the timing of the traffic lights will make this go away. We are skeptical to say the least.	NOTED - presume this is a reference to mitigation of transport impacts on London Road proposed for BISH5 and BISH6 developments	TP1 now requires demonstration of effectiveness of proposed mitigation measures.

Ref	Name/Organisation	Comment	Action Taken	Reason
Transport	Anonymous Comment	Just ban all cars. Deliveries only. Pedestrian's only.	NOTED - Assume refers to town centre pedestrianisation	The principle of pedestrian priority and improvements in the town centre is supported in Policy TP4
Transport	Anonymous Comment	Living in Pynchbek, Bishops Stortford, at 8am is can easily take 40-45 minutes to get from Pynchbek to the M11 roundabout. This is a crazy amount of time spent creating pollution for the area.	NOTED	Para 3.5.1.4 and Figure 2 recognise this problem.
Site specific policies (policies BSHS, BSS and GY)	Anonymous Comment	Need to build more single level accommodation for disabled and the elderly. Many elderly would like to move out of houses to a bungalow, but not possible as so few available, and not going to move into ""apartments"" as want their own garden both for mental and physical benefits, as well as growing flowers, vegetables etc. Plans always assume that the elderly want to move from a house and garden they can no longer manage in to a block of sheltered accommodation flats with no garden, stairs, communal facilities and that is not the case. Communal buildings deprive the elderly of being able to continue to have their own garden which they can maintain and appreciate."	NOTED	The NP teams encouraged developers to build more flexible housing that would be suitable for the elderly or disabled,
Green Infrastructure	Anonymous Comment	New council buildings should be designed to incorporate green areas to soak up CO2 and roof gardens that are created to encourage insects, which are in desperate need of support. "	NOTED.	Council buildings will be subject to the same requirements as other buildings of the same use class including the requirements in the revised Neighbourhood Plans for minimising CO2 emissions (see section 3.1 Climate Change. Roof gardens can contribute to enhancing green infrastructure and increasing biodiversity, both of which are required by the revised Neighbourhood Plans, but may not be appropriate for all buildings.
Transport	Anonymous Comment	Outer developments have often had hourly bus services - just to town centre - when first built, and then reduced. For rail commuters, need to have buses from 5 am until 11 pm that match every train to and from London, and for a minimal additional fare to encourage any use. For shoppers, need to ensure buses go from a few minutes from home to several parts of the town centre, and also areas such as where Homebase etc are, seven days a week and at very frequent timings with ability to transport large items not just one bag of shopping for them to be used by the majority.	NOTED	Policy TP5 supports similar objectives delivered through HCC's Intalink Bus Strategy and developer contributions
Transport	Anonymous Comment	Pedestrianise it.	NOTED - Assume refers to town centre pedestrianisation	The principle of pedestrian priority and improvements in the town centre is supported in Policy TP4
Transport	Anonymous Comment	Practice what you preach and stop destroying the town and it's infrastructure."	NOTED	Para 3.5.1.2 shows that public consultation for the NP recognises the problem of development pressure on road infrastructure as a priority for the Plan.
Transport	Anonymous Comment	Prioritise non vehicular movement. Always put the needs of pedestrians and cyclists First, not second, third or overlooked.	NOTED	Transport Policies in the Plan now adopt the LTP4 User Hierarchy where appropriate (see para 3.5.3.5)
Climate Change	Anonymous Comment	Requiring most new developments to be carbon-neutral is not enough. All where possible should aim for this. This statement just gives the developers a get out for free card.	NOTED	The NP policies must work within the framework of the NPPF and the District Plan
Transport	Anonymous Comment	Routes on foot must be kept clear of hedging etc and Encourage, not just allow, pedestrians with buggies or wheelchairs to travel all the way around our small town."	NOTED	Supported by Policy TP4
Education	Anonymous Comment	Schools must be accessible without the use of cars, from all areas of the town.	NOTED	Distances to facilities including schools covered in TP3
	Anonymous Comment	STOP BUILDING !!!	Noted	This would be in contravention to the basic conditions
	Anonymous Comment	Stop going Woke and deliver common sense changes.	Noted	This does not appear to be related to Neighbourhood Planning
Education	Anonymous Comment	Stortford seems to need refreshing with youth and vigour. We are led by an ageing group who are not looking ahead.	NOTED	Not a matter on which Neighbourhood Planning can have material influence
Transport	Anonymous Comment	Sunday services (including on Easter Day) would need to be available to ensure everyone who wants to can get to the particular church service they want to.	NOTED	Bus service levels are managed by HCC through the Intalink Bus Strategy
	Anonymous Comment	Thank you for making this information accessible and thank you for your time.	Noted	This does not appear to suggest an amendment
Town Centre	Anonymous Comment	The topography of the town precludes cycling longer distances for other than the very fit - and not everyone is actually able to cycle. Cycling also hopeless when wet and/or carrying a lot of shopping."	NOTED	
Town Centre	Anonymous Comment	Town centre must retain sufficient accessible parking close to shops and other amenities - and not to rely entirely on multi-storey parking.	NOTED	
Town Centre	Anonymous Comment	We are concerned at the EHDC plans for more carparking at a time when shop units are falling empty and town centre shopping is generally on the decline.	NOTED	
	Anonymous Comment	Use some common sense and apply what is practicable.	Noted	

Ref	Name/Organisation	Comment	Action Taken	Reason
BP4	Savills on behalf of Solum	BP4 - Future development of the town centre a) commercial or retail development which lies within the Neighbourhood Area will be considered against the following criteria: Proposals that seek to reduce the volume of traffic flow and instances of stationary traffic along South Street will be encouraged. Contribution towards transport improvements should be in line with Hertfordshire County Council's recommendation's and seek to promote sustainable modes, encouraged through effective travel planning As per the comments on Policy TP12.	BP4 to be incorporated in Town Centre section	Bishop's Stortford Town Centre Planning Framework referred to in TC1 extends to cover these areas
Education	Anonymous Comment	We support the plans for vocational training, but would also support additional provision for adult special needs.	Added to policy EP7	Valid comment
Business and Employment	Anonymous Comment	We would welcome more development to promote employment in the area, especially located towards the airport, A120 and M11.	NOTED	BP1, 3 and 7 support this
Transport	Anonymous Comment	We wouldn't object to the ring-road becoming a dual carriageway if studies were to prove this is the way forward.	NOTED	Agree studies are required of the more efficient use of ring-road capacity. HCC Eastern Area Growth and Transport Plan is expected to consider this and is an evidence base document for the NP
Green Infrastructure	Anonymous Comment	When a new build is agreed developers must get support from a specialist in the area of conservation. For example I have seen a new build in Cambridge where the developer including bird boxes all of which were in the incorrect place meaning the birds never used them. "	Policy GIP5i) amended to include a requirement for the assessment to be undertaken by a competent ecologist.	To ensure that the assessment is carried out by someone with appropriate expertise
Green Infrastructure	Anonymous Comment	When building takes place what was destroyed should in some way be replaced. For example large numbers of trees are being cut down. So the developer should be charged for this and then the council can use this money to convert a brown site that can't be built on into a new 'green' area.	NOTED	Policy GIP5a) requires replacement planting of trees that are removed. Policies GIP1 and GIP5 require developers to provide enhancement of green infrastructure and a net gain in biodiversity on their sites.
Business and Employment	Anonymous Comment	Where are new jobs related to the green economy?"	NOTED	This is a question not a comment
Business and Employment	Anonymous Comment	Why do we never seem to attract significant business to our town despite road, rail and air links? Is it a lack of ambition?	NOTED	Provision of quality facilities is key to attracting businesses. This is encouraged by BP1, 3, 7
Green Infrastructure	Anonymous Comment	Would it be possible to turn many of the grassy area on the existing houses estates to flower meadows plus many of the verges along our roads. These will need less care from the council and also provide insects with a much needed food source.	NOTED	Neighbourhood plans can only impose requirements on new developments. But under Policy GIP5h) developrs might seek agreement with relevant local authorities to improve biodiversity on publically owned land, for example by the suggestion made of creating wild flower meadows.
Transport	Anonymous Comment	Would require major investment to enable the majority of local people to give up car and rely totally on public transport.	NOTED	Transport Policies in the Plan now adopt the LTP4 User Hierarchy where appropriate (see para 3.5.3.5)
Climate Change	Anonymous Comment	You claim to be concerned about climate change yet you have significantly increased our carbon footprint by building 3 enormous new estates.	NOTED	The Town Council is not responsible for approval of housing development
Green Infrastructure	Natural England	Thank you for your consultation on the above dated 4 February 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on the Regulation 14 of this neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.	NOTED	This is for information only

Ref	Name/Organisation	Comment	Action Taken	Reason
Green Infrastructure	Natural England	<p>Natural environment information sources</p> <p>The Magic1 website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here2.</p> <p>Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here3.</p> <p>Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p>National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here4.</p> <p>There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.</p> <p>General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic5 website and also from the LandIS website6, which contains more information about obtaining soil data.</p>	Clause 3.4.5.5 amended to include reference to DEFRA Magic environmental data website.	To draw developers attention to this source of information.
Green Infrastructure	Natural England	<p>Natural environment issues to consider</p> <p>The National Planning Policy Framework7 sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance8 sets out supporting guidance.</p> <p>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.</p> <p>Landscape</p> <p>Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p> <p>Wildlife habitats</p> <p>Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here9), such as Sites of Special Scientific Interest or Ancient woodland10. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p>Priority and protected species</p> <p>You'll also want to consider whether any proposals might affect priority species (listed here11) or protected species. To help you do this, Natural England has produced advice here12 to help understand the impact of particular developments on protected species.</p> <p>Best and Most Versatile Agricultural Land</p> <p>Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication Agricultural Land Classification:</p>	NOTED	For information. East Herts Distirct Plan 2018 addresses these matters.

Ref	Name/Organisation	Comment	Action Taken	Reason
Green Infrastructure	Natural England	<p>Improving your natural environment</p> <p>Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:</p> <ul style="list-style-type: none"> • Providing a new footpath through the new development to link into existing rights of way. • Restoring a neglected hedgerow. • Creating a new pond as an attractive feature on the site. • Planting trees characteristic to the local area to make a positive contribution to the local landscape. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. • Incorporating swift boxes or bat boxes into the design of new buildings. • Think about how lighting can be best managed to encourage wildlife. • Adding a green roof to new buildings. <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <ul style="list-style-type: none"> • Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community. • Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. • Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this 14). • Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency). • Planting additional street trees. • Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links. • Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore). 	NOTED	The revised Neighbourhood Plan addresses most of these issues.
Climate Change	Sworders on behalf of Bishop's Stortford College	<p>Thank you for this opportunity to comment on the combined Bishop's Stortford Neighbourhood Plan (1st Revision) documents.</p> <p>We made comments in November 2020 to the draft amendments consultation and note that a number of amendments have since been made to the plan which, in part, address the concerns we raised.</p> <p>As before, whilst we welcome the Town Council's continued focus on keeping the Plans up to date and we acknowledge the importance and desirability of ensuring the Plans address the climate emergency we remain concerned about the deliverability of a number of the proposed policies in practice. In seeking to run ahead of imminent changes to national policy, the Neighbourhood Plan policies could face a number of practical difficulties particularly as a key aspect of the development of policy on climate issues at the national level is ensuring these regimes work in practice.</p> <p>Policy CC1 - Carbon Emissions</p> <p>This policy is unchanged and continues to set out a requirement that every development (not just residential development, and as such would catch any development undertaken by institutions such as schools) should at minimum contribute no new greenhouse emissions in use - which is inferred to be a net zero carbon approach. The supporting text outlines that net zero carbon would be calculated by ensuring that the solar PV on a dwelling displaced as much carbon as emitted by the electricity. The National Planning Policy Framework (NPPF) sets out at paragraph 150(b) that "Any local requirements for the sustainability of buildings should reflect the government's policy for national technical standards."</p> <p>All neighbourhood plans must meet the 'basic conditions' set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 in order to proceed to referendum. The basic conditions include that neighbourhood plans must have regard to national policies and advice. The NPPF is the main document setting out the government's planning policies for England. As such the Neighbourhood plan must meet paragraph 150(b) of the NPPF in order to satisfy the basic conditions. The NPPF is complemented by the National Planning Policy Guidance (NPPG) which expands on paragraph 150(b) at paragraph 009 (reference ID: 6-009-20150327), stating, "The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability. In this respect, planning authorities will need to take account of government decisions on the Housing Standards Review when considering a local requirement relating to new homes.</p>	NOTED	There are precedents for Councils adopting zero carbon policies, e.g. GLA. We need to take this opportunity to be in line with future expected policies from regional and central government.

Ref	Name/Organisation	Comment	Action Taken	Reason
Green Infrastructure	Sworders on behalf of Bishop's Stortford College	<p>Policy GIP1 - Utilising Green Infrastructure to mitigate and adapt to climate change</p> <p>We welcome the clarity provided in GIP1 through the introduction of "unless it can be clearly shown that this is not technically deliverable or financially viable."</p> <p>The NPPF however requires at paragraph 16 that plans should 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. It remains unclear in paragraph b) what would happen in circumstances where the re-provision and/ or increase of the green infrastructure is to be provided off site, and no additional land is available? This is particularly pertinent when considering a grassed site as the policy will require the re-provision of any grassland lost plus the provision of an additional 20% of the site as green infrastructure.</p> <p>Policy GIP5 - Protect wildlife and increase biodiversity</p> <p>GIP5 requires major developments to secure an on-site increase in biodiversity value of at least 20%. Off-site provision is indicated to be an alternative at proposed paragraph h), although no detail of how such a scheme would work has been provided.</p> <p>East Herts newly adopted Sustainability SPD provides detailed guidance on the district council's approach to achieving biodiversity net gain for developments and now requires applications to be able to demonstrate a "minimum 10% net gain in ecological units." referencing the requirement set out in the emerging Environment Bill 2020, to provide a 10% net gain. Once enacted, the Environment Bill will impose a standardised approach and threshold for gains. However, not only do they limit net gains to 10%, there are also deliverability safeguards set out. In particular, the Bill proposes:</p> <ul style="list-style-type: none"> - Allowing developers to take into account higher future biodiversity value as the habitat develops in the years beyond completion of the scheme, rather than being limited to the biodiversity value upon completion. - A system of biodiversity credits which developers can purchase – the detail of which will be implemented via secondary regulations. - Enhancing habitat registered on the Government's proposed 'biodiversity register', which would provide a significantly larger pool of sites for offsetting than is currently available to schemes having to navigate policy GIP5. - The Bill also makes provision for further exceptions to come forward in secondary regulations - A two year transition period. <p>These safeguards are intended to ensure that the requirement for net gain is deliverable in practice and ensures that sustainable development can still come forward.</p>	<p>See item ref. no. 259 regarding changes to GIP1 addressing difficulty of interpreting percentage increase in green infrastructure.</p> <p>See also item ref. no. 204 regarding net gain in biodiversity.</p>	<p>See item ref. no. 259</p> <p>See item ref. no. 204</p>
Site specific policies (policies BSHS, BSS and GY)	Savills on behalf of Solum	<p>Thank you for providing us with the opportunity to engage with the Regulation 14 consultation on the revised Bishop's Stortford Neighbourhood Plan. I write on behalf of our client, Solum, who has an interest in the above site.</p> <p>Below, I set out a brief summary of the background to the site before turning to specific comments on the consultation documents.</p> <p>Background</p> <p>Within the East Herts District Plan (October 2018) the Bishop's Stortford Goods Yard site is allocated for comprehensive redevelopment (Ref. BISH7). Policy BISH7 allocates the site for:</p> <ul style="list-style-type: none"> • around 600 homes (including a range of dwelling type and mix, as well as affordable housing, in accordance with other relevant policies); • a significant amount of B1a office floorspace; • small-scale retail provision; • other community and leisure uses; • multi-storey car parking; • high quality, vehicle-free public realm along the river frontage; • improvements to the riverside environment; • landscaping and tree planting; • necessary utilities; and • other necessary on-site and appropriate off-site infrastructure. <p>Policy BISH7 also states that the Bishop's Stortford Town Centre Planning Framework will form the basis of a Supplementary Planning Document which will be used to inform the masterplanning of this site. The Bishop's Stortford Town Centre Planning Framework (March 2017) was approved by the Council in July 2017 for development management purposes. It is a material consideration in the determination of planning applications within the Town Centre.</p> <p>On 18th July 2018 Solum secured planning permission at the site for the following comprehensive redevelopment proposals:</p> <p>"A hybrid planning application for the comprehensive redevelopment of the 5.82 ha Goods Yard site for mixed</p>	None	This is an introductory paragraph, the substantive comments are in paragraphs set out elsewhere in this consultation record including immediately below
CC1	Savills on behalf of Solum	<p>CC1 Carbon Emissions</p> <p>a) Every development should at a minimum contribute no greenhouse emissions in use (net zero carbon) and, unless demonstrably unviable, provide a net export of electricity to the grid. In cases where it is unfeasible or unviable to achieve net zero carbon on site, any remaining estimated CO2 emissions must be offset through allowable solutions (at present through S106 agreements).</p> <p>Whilst Solum fully supports the aspirations of this policy, the policy needs to align with national legislation, regulations and guidance. This includes the changes that are being proposed to Building Regulations by the 'Future Homes Standards' and 'Future Buildings Standards'. These refer to zero carbon ready development by 2025.</p>	NOTED	There are precedents for Councils adopting zero carbon policies, e.g. GLA. We need to take this opportunity to be in line with future expected policies from regional and central government.

Ref	Name/Organisation	Comment	Action Taken	Reason
HDP1	Savills on behalf of Solum	<p>HDP1 - Residential development and redevelopment</p> <p>a) New residential development will be supported as long as it is found to be meeting the findings of the latest Strategic Housing Market Assessment and subject to Local and Neighbourhood Plan policies in force. It is envisaged such housing will come forward through utilising opportunities for infill and brownfield development wherever possible and through significant developments on the outer edge of the built up area.</p> <p>A Strategic Housing Market Assessment (SHMA) is just that, it is a strategic document that covers a strategic area. Any findings or recommendations contained within it are for that strategic area as a whole. It does not take into account sub-areas or site specific circumstances.</p> <p>Requiring all new residential development to strictly meet the findings of the latest SHMA, as the current wording of Policy HDP1 does, is unreasonable and risks deliverability. Policy HDP1 sound more aligned with the wording of District Plan Policy HOU1 which requires "an appropriate mix of housing tenures, types and sizes will be expected in order to create mixed and balanced communities appropriate to local character and taking account of the latest Strategic Housing Market Assessment and any additional up-to-date evidence, including the latest East Herts Housing and Health Strategy; local demographic context and trends; local housing need and demand; and site issues and design considerations."</p> <p>c) Brownfield development and the redevelopment of existing residential properties to create higher density shall be supported subject to the achievement of high quality design that meets the requirements of other policies and does not compromise to an unacceptable level the amenity value in either neighbouring properties or for the future occupiers of the proposed development. Part C of Policy HDP1 could go a lot further in its application by encouraging higher density development on appropriate sites (e.g. town centre locations, and / or sites next to train stations / transport.</p>	<p>HDP1a deleted.</p> <p>HDP1b) Not clear what the correspondent is suggested, have written back to enquire however no response received so the comment is NOTED</p> <p>HDP1c NOTED.</p>	<p>HDP1a deleted. This policy, whilst helpful when the plan was initially created (at which time the SHMA was the most up to date document and the District plan dated from 2007), is now supurfluous as the District plan is up to date.</p> <p>HDP1b) Not clear what the correspondent is suggested, have written back to enquire</p> <p>HDP1c) Policy already encourages higher density in the sites suggested which are all brownfield</p>
HDP2	Savills on behalf of Solum	<p>HDP2 - Setting and character of buildings, streets and spaces</p> <p>b) Developments which can generally demonstrate high quality and empathy with their setting within the Neighbourhood Area will be encouraged. This means schemes will be supported if:</p> <p>They are accompanied by a Building for Life 12 Assessment and that score green or amber against all applicable criteria. An amber score will only be acceptable where it is accompanied by a clear justification in terms of local circumstances or viability explaining why a green score cannot be achieved.</p> <p>Building for a Healthy Life (BHL) has since updated Building for Life 12. Policy HDP2 should be updated to reflect this.</p>	Reference updated	The BHL intro says 'Many local authorities across the country have cited Building for Life 12 in their Local Plans and Supplementary Planning Documents. As BHL is the new name for Building for Life 12, local authorities can use BHL without having to rewrite existing policy documents.' So this appears to be a case of adopting the new name only.
HDP4	Savills on behalf of Solum	<p>HDP4 - Dwelling Mix Strategy</p> <p>a)On schemes where there is a net gain of five or more homes, developers are required to submit a Dwellings Mix Strategy as part of the Design and Access Statement with any planning application. The strategy must clearly demonstrate how the proposed development addresses the objectively identified needs within Bishop's Stortford. This must cover all needs including those for all forms of market and 'affordable' housing.</p> <p>As set out above, the District Plan does not stipulate specific requirements in terms of residential type and mix and only requires an appropriate mix of housing tenures, types and sizes appropriate to local character and taking account of the latest Strategic Housing Market Assessment and any additional up-to-date evidence, including the latest East Herts Housing and Health Strategy; local demographic context and trends; local housing need and demand; and site issues and design considerations.</p> <p>The latest Strategic Housing Market Assessment for the area is now fairly dated (July 2017) and it is considered that a different dwelling mix would be required in the area and therefore the proposed policy HDP4 would not be reflective of the needs of the local area.</p> <p>d) All schemes shall consider alternative types of purchase funding such as self-build for market housing. The Self-build Register should be used to assess the level of demand in an area to determine the proportion of land given over to such type of building, along with other relevant factors such as the size, position, accessibility and terrain of the site.</p> <p>Alternative types of purchase funding housing are not appropriate for all schemes (e.g. if it is a small scheme, it the site is heavily constrained, viability reasons). Like part c) of this policy, part d) should be appropriately worded to take account of this situation.</p>	<p>HDP4a) NOTED</p> <p>HDP4d) NOTED.</p>	<p>HDP4a The policy refers to 'the objectively identified needs within Bishop's Stortford' not the SHMA so appears to be exactly what the correspondent is advocating. Correspondent has been asked to clarify in case he can add anything.</p> <p>HDP4d the policy says 'shall consider'. If the consideration demonstrates that that a particular type of funding is not appropriate, the evidence submitted in response to this policy can show why and the planning authority will doubtless make a judgement. The correspondent has been asked to clarify in case he can add anything</p>
GIP1	Savills on behalf of Solum	<p>GIP1 - Utilising Green Infrastructure to mitigate and adapt to climate change</p> <p>c) A meaningful increase, as a guide, might be at least a 20% increase in the combined area of such features for a previously undeveloped site that already has a network of green features or 10% of the area of a site with no pre-existing green infrastructure; or the equivalent on other land under the control of the developer within the neighbourhood plan area or its proximity: subject to compliance with other requirements of District Plan and this Neighbourhood Plan.</p> <p>Part c) of this policy is not clearly written and ambiguous. It will not be evident from 'A meaningful increase, as a guide, might be at least 20% increase...' how a decision maker should react to development proposals. Such clarity is required by paragraph 16 of the NPPF. A set figure for green infrastructure should not be stipulated within the policy, rather, schemes should be assessed on a site by site basis taking into account site specific circumstances.</p>	See item ref. no. 259 regarding changes to GIP1 addressing difficulty of interpreting percentage increase in green infrastructure.	See item ref. no. 259

Ref	Name/Organisation	Comment	Action Taken	Reason
GIP5	Savills on behalf of Solum	<p>GIP5 - Protect Wildlife and increase biodiversity</p> <p>f) A meaningful increase, as a guide, might be at least a 20% gain in biodiversity units.</p> <p>g) Alternatively, the requirements for biodiversity gain shall be assessed in accordance with the Environment Bill 2020 once the Bill has been enacted.</p> <p>As above, Part f) of this policy is not clearly written and ambiguous. It will not be evident from 'A meaningful increase, as a guide, might be at least a 20% gain...' how a decision maker should react to development proposals. Such clarity is required by paragraph 16 of the NPPF. Until such time of the Environment Act has received Royal Assent, a set figure for biodiversity net gain should not be used within this policy. The Environment Bill referred to in part g) is subject to change. The wording of part g) should be drafted to take this into account.</p>	See also item ref. no. 204 regarding net gain in biodiversity.	See item ref. no. 204
GIP7	Savills on behalf of Solum	<p>GIP7 - Improving/expanding allotment</p> <p>b) For developments in excess of 200 dwellings (or groups of adjacent developments which together amount to more than 200 dwellings) it will be expected that land either on or immediately adjacent to the development site is provided and is prepared by the developers (including facilities, fencing, land preparation, soil improvement if required) and transferred to the allotment authority (currently the Town Council) at no cost. The provision of space for new allotments will be at the rate of 0.24ha per 1,000 population. Vehicular access will be required and the site must be chosen accordingly.</p> <p>The requirement to provide allotments for all developments over 200 dwellings is considered unreasonable. The requirement does not take into account site specific constraints or circumstances. Brownfield sites in town centre locations, which are typically constrained by their size, should be optimised for development in line with Policy HDP1 of the draft Neighbourhood Plan, but the provision of allotments is likely to go against this policy objective. Part b) of Policy GIP7 should acknowledge that such a requirement is not suitable for all.</p>	Caveat added to GIP7	To address exceptional circumstances
TP1	Savills on behalf of Solum	<p>TP1 - Assessing transport impacts and mitigation of development on traffic congestion and resident amenity</p> <p>All major proposed developments shall be supported by a Transport Assessment or Transport Statement and a Travel Plan. The Transport Assessment and Travel Plan shall be carried out as part of the Masterplan process for such developments and the scope shall be agreed by the organisations collaboratively preparing the Masterplan as identified in the District Plan Policy DES1.</p> <p>Policy TP1 suggests that all major proposed developments will be subject to a masterplan process. This is not the case. Policy DES1 of the District Plan states that 'All significant development proposals will be required to prepare a Masterplan...'. A development could be considered a major development but not a 'significant' development. Policy DES1 tends to apply to the strategic allocations within the District. Policy TP1 should be amended accordingly.</p>	NOTED – clarification of wording required	TP1 applies differently for "major" developments (requiring Transport Statements) and "significant" developments (requiring Transport Assessments). TP1 requires TA's to be subjected to the masterplan process where this is required for significant developments (only) per DES1. Text to be clarified.
TP7	Savills on behalf of Solum	<p>TP7 - Cycle Parking</p> <p>b) In addition to meeting the requirements of East Hertfordshire Vehicle Parking Standards for cycle parking on the development, major developments are also expected to make financial contributions towards the provision of cycle parking at key destinations such as schools, the railway station, the town centre and leisure centres.</p> <p>Major developments should only be required to make financial contributions towards the provision of cycle parking at key destinations if there is an identified need for such cycle parking as a direct result of the proposed major development itself (as required by regulation 122 of the CIL Regulations). Policy TP7 should be updated to reflect this.</p>	NOTED	CIL does not currently apply in East Herts. It is assumed that S106 planning obligations – agreed between the parties - would apply to major developments to deliver TP7 provisions and cycle parking priorities identified primarily from the HCC GTP.
TP12	Savills on behalf of Solum	<p>TP12 - Financial contributions to improve town accessibility and connectivity</p> <p>a) Financial contributions will be sought based on District Plan Policy DEL1 where they are necessary to make the development acceptable in planning terms through s106 agreements and HCC's planning obligation toolkit to mitigate traffic impacts of development and deliver improvements required by District Plan site allocation policies which deliver on District Plan policy TRA1 to achieve accessibility and promotion of sustainable transport, connectivity and parking improvements in the neighbourhood area for pedestrians, cyclists, bus travel and vehicle users that are identified in approved transport investment programmes. b) Should East Herts District Council introduce a Community Infrastructure Levy (CIL) during the Plan period The Town Council and Thorley Parish Council would seek to identify projects which could be funded through the neighbourhood portion of CIL. Otherwise they will seek to influence the relevant Planning Authority's negotiations on planning obligations with the developer to ensure that development finances unspecified transport mitigations and improvements sought through Neighbourhood Plan policies on a case-by case basis</p> <p>Hertfordshire County Council (HCC) is currently consultant on a new 'Guide to Developer Infrastructure Contributions' which will replace its current Planning Obligations Toolkit. Within this HCC is proposing significant increases to required financial contributions towards infrastructure. This will place increased financial pressures on development within the Neighbourhood Plan area. Any additional financial contributions sought by the District Council and the Town Council will place even more financial pressure on developments. The Town Council should be mindful of this in finalising Policy TP12. Too many contributions risk deliverability, most notably affordable housing.</p>	NOTED - assumed to refer in particular to BISH6 where S106 negotiations are currently ongoing.	Any development which has a severe residual cumulative impact (per NPPF para 109) on the surrounding highway network and fails to mitigate that impact is unsustainable. HCC's emerging 'Guide to Developer Infrastructure Contributions' supports the objectives of TP12 to ensure that development is sustainable (per NPPF para 7) as well as affordable. TP12 seeks to ensure that any test of viability of sustainable development includes the costs of mitigation of severe traffic impacts.

Ref	Name/Organisation	Comment	Action Taken	Reason
TC1	Savills on behalf of Solum	<p>TC1 - Town Centre Planning Framework</p> <p>a) Development proposals in Bishop's Stortford Town Centre should be able to demonstrate compliance with design guidance contained within the Bishop's Stortford Town Centre Framework. Any development which cannot demonstrate compatibility must be capable of being resolved.</p> <p>The Bishops Stortford Town Centre Framework is just that, it is a Framework. It is a material consideration in the determination of planning applications within the Town Centre, rather than forming part of the Development Plan or a Supplementary Planning Guidance. Requiring strict compliance with the Framework as policy TC1 currently suggests goes against the status of the Framework in planning policy terms. Alternative wording for Policy TC1 is suggested below which better reflects its status:</p> <p>"Development proposals in Bishop's Stortford Town Centre should have regard to the Bishop's Stortford Town Centre Framework and demonstrate broad compliance with the design guidance."</p>	Wording of TC1 changed to that suggested	See above to change the wording to better reflect the intention
EP1	Savills on behalf of Solum	<p>EP1 - School availability</p> <p>a) New developments will only be acceptable if primary school places are made available for all additional children within an appropriate distance of the development as set out in policy TP3 and secondary school places are made available in Bishop's Stortford in schools that are reasonably accessible from the proposed development location.</p> <p>Policy EP1 as currently worded has the potential to prevent development within the town. In accordance with HCC's Planning Obligation Toolkit / Guide to Developer Infrastructure Contributions, all developments that will create an extra demand for school places will be required pay a financial contribution towards education to mitigate against the demand that that development creates. The onus is then on HCC to deliver the addition school places. Restricting development on the basis of school capacity is therefore unjustified as the development would have met its requirements. This policy should be deleted.</p>	Policy modified to read 'a) New developments will only be acceptable if primary school places are made available for all additional children within an appropriate distance of the development as set out in policy TP3 and secondary school places are made available in Bishop's Stortford in schools that are reasonably accessible from the proposed development location or the developer makes contributions (whether financial or otherwise) requested by the Education Aucation Authority, to enable any shortfall in provision caused by the development to be addressed by the Education authority.'	Comment is correct in that the Developer does not ultimately ghave control f the education authorityn however this does not absolve the reasonable requirement to mitigate the effects of development by means of financial contributions 9or otherwise as reasonably determined by the education authority
HP1	Savills on behalf of Solum	<p>HP1 - Accessible GP practices</p> <p>b) For developments of over 500 dwellings appropriate provision must be addressed as part of the development proposal. Applicants must engage with the relevant health authorities at the earliest possible stage.</p> <p>Policy HP1 should make it clear that '...must be addressed as part of the development...' can include a financial contribution in line with HCC's requirements rather than on-site provision. On-site provision is not appropriate for all developments.</p>	policy modified to read 'b) For developments of over 500 dwellings appropriate provision must be addressed as part of the development proposal. This may be through onsite provision or financial contribution to local offsite provision where onsite provision is not viable. '	Valid comment
GY2	Savills on behalf of Solum	<p>GY2 - Site Uses</p> <p>Residential use up to at least 400 dwellings, or whatever lower limit supersedes this in the draft District Plan once it is made; Firstly, 'up to at least 400 dwellings' does not make sense. Notwithstanding this, Policy BISH7 of the District Plan allows for '...around 600 homes...'. Policy GY2 should be amended to align with Policy BISH7. This would also better align with the extant planning permission at the site.</p> <p>Hotel, located close to the transport interchange;</p> <p>Policy BISH7 of the District Plan does not specifically require a hotel. Policy GY2 should be amended to better align with Policy BISH7 (i.e. '...other community and leisure uses.')</p>	(a) amend GY2 to read Residential uses to around 600 as per Bish 7 of District Plan. (b) NOTED - retain Hotel, located close to the transport interchange.	(a) the reference to up to at least 400 homes has been superceded by Bish 7 of the DistrictPlan and Planning Permission has already been granted for higher figure. (b) retention of Hotel close to transport interchange makes sense and in the event that no takers for the hotel then it has been proposed that some other temporary use is considered aligning with Bish 7 of the District Plan
GY2	Savills on behalf of Solum	<p>GY2 - Site Uses</p> <p>Residential use up to at least 400 dwellings, or whatever lower limit supersedes this in the draft District Plan once it is made; Firstly, 'up to at least 400 dwellings' does not make sense. Notwithstanding this, Policy BISH7 of the District Plan allows for '...around 600 homes...'. Policy GY2 should be amended to align with Policy BISH7. This would also better align with the extant planning permission at the site.</p> <p>Hotel, located close to the transport interchange;</p> <p>Policy BISH7 of the District Plan does not specifically require a hotel. Policy GY2 should be amended to better align with Policy BISH7 (i.e. '...other community and leisure uses.')</p>	Amend wording from "Residential up to at least 400 dwellings or what ever lower limit supercedes this in the draft District Plan when made." to "Residential provision for around 600 dwellings"	The comment is a repeat of Ref 200 in line 30

Ref	Name/Organisation	Comment	Action Taken	Reason
Site specific policies (policies BSHS, BSS and GY)	Savills on behalf of Bellway Homes Limited (North London)	<p>Savills is instructed by Bellway Homes Limited (North London) to submit representations in response to the Regulation 14 consultation on the 1st revision of the Bishop's Stortford Town Council Neighbourhood Plan for All Saints, Central, South and Part of Thorley. We are grateful for the opportunity to submit formal representations and hope they are helpful to the Town Council in preparing the revised neighbourhood plan for submission.</p> <p>Our focussed comments are in relation to land at Bishop's Stortford High School, London Road, Bishop's Stortford. This land is an allocated housing site identified in policies BISH1 (Development in Bishop's Stortford) and BISH6 (Bishop's Stortford High School Site, London Road) of the East Hertfordshire District Plan 2018.</p> <p>In summary we are generally supportive of the neighbourhood plan continuing to include a vision and objectives (Section 2.5) for the Bishop's High School site and also policies BISHS1 (Setting and character of buildings) and BSHS2 (Connectivity) to form an allocation. This representation includes detailed observations made in relation to planning application (ref: 3/20/0151/OUT) on the site, which obtained a resolution to grant at East Herts District Council (EHDC) Development Management Committee on 4th November 2020, that we suggest should be reflected in the revised neighbourhood plan.</p> <p>Making these revisions will help the revised neighbourhood plan to accord with paragraph 16 of the National Planning Policy Framework (NPPF) and guidance set out in paragraph 041 Reference ID: 41-041-20140306 of the National Planning Practice Guidance (PPG).</p> <p>This paragraph requires that '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.'</p> <p>Planning application history</p>	NOTED - no change to policy...	A resolution to grant a planning application cannot be interpreted as having been granted. At the time of this NP revision there is no indication that would change the policy BISH1. The NP revision is in accordance with the District Plan and quotes 'around 150 houses' not 200-250.
Climate Change	Savills on behalf of Bellway Homes Limited (North London)	<p>The proposed revision to the Neighbourhood Plan includes a new section on Climate Change. Specific policy/ies that encourage/s measures to mitigate and adapt to climate change mitigation would reflect national guidance (NPPF paragraph 149), policies in the adopted Local Plan as well as reflecting the objectives of the Climate Emergency. Whilst this general approach is therefore broadly supported, it is important for the policy to ensure there is clarity in what is required and the requirements are not so aspirational that they risk compromising the delivery of housing and other objectives within the Neighbourhood and Local Plan.</p> <p>The Neighbourhood Plan is seeking to require that new developments achieve 'zero carbon emissions' from the point that the Neighbourhood Plan is made. This requirement goes beyond both the Local Plan requirements and the LPA's Climate Change agenda. This also appears to be a strategic policy. Not only should strategic policies be dealt with in the Local Plan but there does not appear to be any evidence to support the requirement for achieving 'net zero carbon'. It is therefore recommended that the Neighbourhood Plan progresses in accordance with policy CC2: Climate Change Mitigation of the East Herts Local Plan, which requires that:</p> <p>I. All new developments should demonstrate how carbon dioxide emissions will be minimised across the development site, taking account of all levels of the energy hierarchy. Achieving standards above and beyond the requirements of Building Regulations is encouraged.</p> <p>II. Carbon reduction should be met on-site unless it can be demonstrated that this is not feasible or viable. In such cases effective offsetting measures to reduce on-site carbon emissions will be accepted as allowable solutions.</p> <p>Notwithstanding this point, the wording of the policy lacks clarity. The policy requires that 'Every development should at a minimum contribute no greenhouse gases in use (net zero carbon) and...' It is not clear what 'in use' is intended to mean. The NPPG (Para 041) requires that policies in a Neighbourhood Plan should be 'clear and unambiguous' and be drafted 'with sufficient clarity that a decision maker can apply it consistently and with confidence.' If the policy is reworded to be consistent with the Local Plan, this issue would also be addressed.</p>	NOTED	There are precedents for Councils adopting zero carbon policies, e.g. GLA. We need to take this opportunity to be in line with future expected policies from regional and central government.

Ref	Name/Organisation	Comment	Action Taken	Reason
Green Infrastructure	Savills on behalf of Bellway Homes Limited (North London)	<p>Whilst using green infrastructure to 'mitigate and adapt to climate change' is broadly supported, the policy refers to percentage increases in proportions of green infrastructure. It is considered the interpretation of these requirements and how areas are measured could potentially be open to various interpretations.</p> <p>Biodiversity net gain is referred to in the East Herts District Local Plan along with the requirement for applications, where appropriate, to be accompanied by a Biodiversity Impact Assessment using the locally approved DEFRA Biodiversity Metric. Furthermore, there is additional new legislation due to be published imminently regarding Biodiversity Net Gain through the Environment Bill.</p> <p>It is therefore suggested that the references to percentage increases in proportions of green infrastructure are dealt with through existing policy and emerging legislation, rather than through a new policy in the Neighbourhood Plan. This will ensure there is both consistency and clarity in the approach to be adopted.</p>	<p>See item ref. no. 259 regarding changes to GIP1 addressing difficulty of interpreting percentage increase in green infrastructure.</p> <p>Preamble and policy GIP5 regarding biodiversity net gain have been amended to refer to the recently adopted East Herts DC Sustainability SPD March 2021 which provides a method for calculation of ecological gains, requiring a minimum gain of 10% (similarly to the Environment Bill). GIP5f) (was g)) allows the Environment Bill to be used for assessing biodiversity gain as an alternative to the SPD once it has Royal Assent. However a gain of 20% is retained in the NP in support of Herts County council's objectives of biodiversity and wildlife increases on its own land and across the county.</p>	See item ref. no 259 below.
	CPRE Hertfordshire	<p>CPRE Hertfordshire (CPREH) supports the production of Neighbourhood Plans (NPs) as it accords with one of its core aims for people to be more engaged with planning in the countryside, and is grateful for the opportunity to comment. CPREH notes the work of the Neighbourhood Plan Group and Town Council adding to the already substantial documentation including new chapters on the Town Centre and climate change, and additional passages on Transport and Green Infrastructure.</p> <p><u>Strengths</u> CPREH welcomes treatment of the following issues:</p> <ul style="list-style-type: none"> - Comprehensive approach for a positive consultation - Very tailored local site-specific policies - Local green spaces of value identified in response to experience of pandemic - Additional sections on Town Centre and Climate Change are timely and necessary - Additional sections for green infrastructure and transport - Support for electric vehicles, modal shift and traffic demand measures. 	NOTED	This appears to be an endorsement without suggesting specific amendment
Transport	CPRE Hertfordshire	<p>Policy TP4 promotes priority to sustainable travel and Policy TP5 supports better bus travel which are welcomed; further measures could be included either in policy or text to support public transport.</p> <p>Policies TP9 and TP10 referring to new developments could be amended to include reference to existing streets and increased cycling use, including ebikes.</p> <p>The use of some form of road pricing or pollution charging mechanism should be considered to address the Hockerill AQMA where traffic problems are particularly acute and have persisted since at least 2007 with pollution levels at twice the prescribed limits.</p> <p>Electric vehicles are still only a small market but there is a legacy of millions of Internal Combustion Engine (ICE) vehicles; the plan could be clearer in promoting reduced car use to meet carbon emission objectives.</p>	NOTED - there are limitations on NP's ability to promote measures or policies for the direct support of public transport services, road pricing or pollution charging mechanisms.	Support for TP4 and 5 NOTED, subject to limitations on NP scope. TP 9 and 10 focus on measures controlling parking and speeds arising from / in new developments. However, TP 9c promotes traffic demand management through parking management measures including existing car parks and is supported by sustainable travel policies in TP4 to reduce existing car use to an in the town centre and increase other modes such as cycling and buses. This is also intended to reduce carbon emissions, improve air quality (TP 2) and promote the use of EVs (in line with NPPF guidance). The policies are also underpinned by the LTP's newly introduced User Hierarchy which prioritises, first, reduced travel demand (para 3.5.3.5)
Green Infrastructure	CPRE Hertfordshire	<p>Policy GIP1 is supported and the Town Council may wish to consider promoting the Building In Nature accreditation¹ system for new development.</p> <p>Policy GIP2 is supported and we suggest that new development close to green spaces should respect entranceways and overlook public green spaces as the spaces and approaches would benefit from passive surveillance.</p> <p>Policy GIP3 is supported and there may be a need for a proper audit of areas, routes and the actions needed. The Stort Path should promote walking and cycling up to Stansted Mountfitchet linking to the new green spaces in the north of the Bishops Stortford Street Trees are promoted in new developments but residents of existing streets may well wish to see enhancement by tree planting. Policy GIP3 could include comments to support residents who promote schemes locally for street trees, given the multiple benefits that follow.</p>	<p>Noted that Waterside Stortford promotes paths extending up to Stansted Mountfitchet along the River Stort through the town meads.</p> <p>The River Stort Partnership provides a vehicle for identifying potential enhancements to the Stort corridor including pathways along it and promotes projects to carry out selected works. Clause 3.4.5.13 added to support tree planting on street scenes.</p>	Clause added to support tree planting on street scenes

Ref	Name/Organisation	Comment	Action Taken	Reason
Town Centre	CPRE Hertfordshire	<p>Inclusion of sustainable travel targets and monitoring would provide a stronger focus. Reference may be made to Decarbonising Transport March 2020. CPRE has called for buses to be low emission and the BID could take a lead in public transport promotion and workplace parking fees to fund public transport. Dedicated public transport lanes or routes in the town centre would improve time – keeping and the priority and attractiveness of public transport.</p> <p>In the light of reduced office use and comparison goods shopping, it is recommended that Policy BP4 be stated more positively to support residential uses and promote low - car or car free occupation with S106 sums for sustainable transport. CPRE supports residential use in the town to boost its economy, vitality and lessen pressures for housing on greenfield sites. The NP suggests that flats are not being occupied and this needs further investigation as the young and elderly may prefer town centre locations.</p> <p>Increased consideration of the post pandemic challenges to the town centre, given potential reductions in commuting to offices, increased online comparison goods shopping and related concerns.</p>	Noted - question of low emission buses is dealt with under Transport section. Reference to under occupation of flats could be resolved by increased availability of affordable/ social dwellings in the Town Centre . As dedicated public transport lanes in the Town Centre, it is really too small with insufficient road width to facilitate such	Greater subsidies to encourage Bus Companies might persuade greater use, currently majority of use is by elderly and school children and post Covid 19 reluctance to use public transport will take time to change. Still a lack of sufficient regular routes from the villages and fringe estates let alone cross district/ county regular frequency routes.
Climate Change	Bishop's Stortford Climate Group	<p>We very much welcome the key policies in Plan that will enable the town to contribute to the District's approach to reducing greenhouse gas emissions with the aim of the District becoming carbon neutral by 2030. The Climate Change policies and the approach of considering that every planning application should be considered for whether it is doing everything possible to reduce the impact of climate change.</p> <p>We support the Neighbourhood Plan policy objective 3.1.2 and agree that new developments must be planned for zero carbon emissions from now, given that the costs of doing so retrospectively are completely disproportionate (The government's advisor, the Committee on Climate Change reported in 2019 that it costs between £16,000 and £25,000 to retrofit a new semi-detached house to be compatible with net zero carbon, whereas it costs between £3,000-£5000 to build in compatibility at the point of construction).</p> <p>We also support the proposals for solar pv generation on new developments to offset their electricity use. We agree that the Plan should encourage local development of clean energy, where this fits with the Plan's policies to support green infrastructure and biodiversity, including access to the surrounding countryside and the River Stort and the use of the Green Belt as outdoor space for people's health and well-being, for walking, cycling and horse riding.</p> <p>We support the need to give sufficient weight to climate change in relation to improvements to existing building stock; and for building design to be for design life, resilient to future impacts from climate change.</p>	NOTED	support is much appreciated!
Green Infrastructure	Bishop's Stortford Climate Group	<p>The recognition that our green infrastructure makes an important contribution to mitigating climate change and the biodiversity emergency that is also occurring in part due to climate change but also due to our poor management of ecosystems.</p> <p>We support the Neighbourhood Plan policy objectives in 3.4.2.1 and the details which provide support for recreation and movement with reduced need for travel by car; woodland management and tree planting; providing biodiverse habitats and land for local food production. We note that grassland management is important for enhancing its value for biodiversity and that "no mow" could be encouraged in spaces in parks and on road verges and council/Land Trust owned green spaces. We support the additional listings of Local Green Spaces and Other Green Spaces of value to residents and as wildlife corridors. We support the Plan's recognition that Green Infrastructure needs to be well maintained and considered as a network, with routes for walkers and cyclists to cycle from place to place away from traffic. Green spaces also need to provide a network for nature and the Neighbourhood Plan should require developments to provide for the joining up of green spaces to provide wildlife corridors. We welcome the support that the Plan provides for establishing community orchards.</p>	Policy GIP4c) added to provide for continuity of wildlife networks across development sites. Clause 3.4.5.12 amended to promote flexible approach to grassland management.	To strengthen the policies and text in the ways suggested.
Transport	Bishop's Stortford Climate Group	<p>Transport policies to improve sustainable travel.</p> <p>We support the Neighbourhood Plan policy objectives 3.5.2 but are concerned that the supporting detail will not deliver strategic contributions to achieve policy 3.5.7, that development should contribute to improve town accessibility and connectivity. This is because the current draft of the GTP does not set out a strategic approach to improving the accessibility and connectivity of the town. So the references in the Neighbourhood Plan to the GTP could enable and indeed encourage developers to pay contributions to initiatives which are of limited value.</p> <p>We would argue that the Neighbourhood Plan needs to set out the strategic transport priorities for the town as a guide to developer contributions. From our perspective the strategy for the town's transport improvement is to manage vehicular traffic while supporting modal shift to improve accessibility and connectivity.</p> <p>This requires developers to contribute to:</p> <ul style="list-style-type: none"> - Strategic traffic management studies and delivery of traffic management initiatives and investment that direct traffic around the town rather than through it, ie encouraging traffic to use the bypass, rather than going through the town or using rat roads; and that reduce traffic speed in the town centre and in residential areas; - Initiatives investing in making routes for walkers and cyclists into town, around schools and within the town centre safer to encourage modal shift; - Traffic management initiatives giving priority and improving quality of service on public transport. 	Noted - see additional text in section 3.5.1	Additional paragraphs added on a strategic approach to improving the accessibility and connectivity of the town. See additional paragraphs 3.5.1.7 - 9 and revised para. 3.5.7.5 on emerging GTP

Ref	Name/Organisation	Comment	Action Taken	Reason
Transport	Hertfordshire County Council	1.1 The Bishop's Stortford Neighbourhood Plans (2020-2032) does align with Hertfordshire County Council Local Transport Plan (LTP4) and the forthcoming Eastern Area Growth and Transport Plan. However, HCC add that travel behaviour change will be encouraged through various initiatives but crucially this will need to be supported where appropriate by a greater emphasis on demand management, such as with the development of plans to constrain car use through parking charges.	Noted - see additional text in section 3.5.1	Additional paragraphs added on a strategic approach to improving the accessibility and connectivity of the town. See additional paragraphs 3.5.1.7 - 9 and revised para. 3.5.7.5 on emerging GTP.
Transport	Hertfordshire County Council	1.2 Para 2.4.2 – <i>Provide adequate parking</i> – HCC considers that without any context of cycle parking suggested later in the plan this objective looks to contradict the other objectives for transport and climate change. HCC would suggest this is reworded.	Noted - amended	Para 3.5.2.1 - Amend third objective bullet to "Provide vehicle and cycle parking to support sustainable travel objectives" Also amend Objective 3.5.5
TP1	Hertfordshire County Council	1.3 Para 3.5.3.9 – <u>Policy TP1</u> – HCC fully supports this policy, as this aligns with Policy 3 and 5 of LTP4. HCC would be interested to know in what form any required traffic surveys would follow as part of monitoring of development impact.	Noted - supports LTP4 policies	The scope of surveys for monitoring development impact follows that set out in TP1(f) which requires that the developer submits a Monitoring Framework for approval by HCC including a schedule of traffic surveys to be then conducted at incremental levels of the development's occupancy to monitor trip generation from the development to measure predicted impact on flows and junction capacities compared with the Transport Assessment submitted with the application.
TP2a	Hertfordshire County Council	1.4 Para 3.5.3.20 – <u>Policy TP2</u> – HCC agrees with the general principle of both elements of this policy but would suggest that this is expanded or revised to target emissions from transport more effectively, as planting and monitoring alone will be insufficient to achieve widescale change. HCC would suggest incorporating an element on increasing sustainable travel behaviour as a way of improving air quality (see Policy 19 and Policy 20 of LTP4).	Noted - amended	TP2(a) has been amended to reference LTP4 Policies 19 and 20 and the now approved Sustainability SPD as material considerations in improving air quality
TP3	Hertfordshire County Council	1.5 Para 3.5.4.3 – <u>Policy TP3</u> – It should be highlighted that HCC only consider 400m to a bus stop as reasonable where sufficient frequency of service is provided and where key services can be accessed within 30 minutes (Policy 6 of LTP4) including walking to a bus stop, otherwise a lower threshold should be considered. HCC fully supports the element of this policy to implement sustainable travel infrastructure from the outset of occupation of new major developments.	Noted - amended	TP3(b) Intro - delete "for" and replace with "and adopt measures to achieve the following" and amend first bullet to "Bus Stops (from which key services can be accessed within 30 minutes) – 400m"
TP4	Hertfordshire County Council	1.6 Para 3.5.4.6 – <u>Policy TP4</u> – HCC fully support this policy as it aligns with Policy 7, 8 and 11 of LTP4. HCC would suggest however in element b) that wherever possible we should strive to achieve measures that do not place vehicles over active travel (see Policy 1 of LTP4) - measures such as underpasses, tunnels and bridges create a perception of severance and often are not direct enough to be convenient. Underpasses in particular are not attractive given they do not instil a sense of confidence and security unless they are appropriately wide, well overlooked and well lit.	Agreed - amended	TP4(b) amended to "... such as underpasses, tunnels, bridges and or other crossing facilities at road level ...
TP5	Hertfordshire County Council	1.7 Para 3.5.4.9 – <u>Policy TP5</u> – HCC fully support this policy as it aligns with Policy 9 of LTP4. HCC would again highlight that we should only consider 400m to a bus stop as reasonable where sufficient frequency of service is provided and where key services can be accessed within 30 minutes.	Noted - amended	Policy TP5(a) - replace "serving these destinations" with "from which key service destinations can be accessed within 30 minutes"
TP6	Hertfordshire County Council	1.8 Para 3.5.4.14 – <u>Policy TP6</u> – HCC would welcome clarity on the point 'Safe school drop off and pick up zones'. If this is vehicular, we would suggest this does not align with the notion to increase sustainable travel to schools.	Noted - but not amended	This policy is retained from the existing NP policy on Safer, Sustainable School Travel. Whilst there is increased emphasis on sustainable travel to schools it is noted that the TA for BSS - including the future TBSHS relocation to BSS and approved by HCC - forecasts 732 vehicular trips to/from the schools in the AM peak. It remains essential that school drop off and pick up zones are safe.
TP7	Hertfordshire County Council	1.9 Para 3.5.5.1 – <u>Policy TP7</u> – HCC fully supports this policy as it aligns with Policy 8 of LTP4.	Noted	Policy Supported
TP8	Hertfordshire County Council	1.10 Para 3.5.5.5 – <u>Policy TP8</u> – HCC supports the element of this policy to provide electric vehicle charging infrastructure, as it aligns with Policy 5 of LTP4. HCC would however caution that parking within residential developments at a significant scale will likely lead to unsustainable travel behaviour, and this needs to be met with a reasonable level of sustainable travel infrastructure.	Noted	Whilst we acknowledge that the scale of residential development and associated parking policies lead to to unsustainable travel behaviour, parking provision at new residential developments is largely determined by the 2008 SPD 'Vehicle Parking Provision at New Development' now being revised by EHC - as referenced in the policy. The NP policy on residential development is significantly constrained by DP and SPD housing development policies. Minor amendment made to TP8 c)

Ref	Name/Organisation	Comment	Action Taken	Reason
TP9	Hertfordshire County Council	1.11 Para 3.5.5.11 – <u>Policy TP9</u> – HCC fully support this policy as a demonstration of the intention to provide parking only where absolutely necessary, and to allow reductions in vehicular parking which could lead to increased sustainable travel. HCC do not however agree with element d) of this policy - as identified in LTP4 the ample supply of free parking in Hertfordshire reinforces car dependent behaviour and therefore does not align with the sustainable travel objectives of LTP4. Additionally, there is an overall issue with short-term free parking as it encourages shop and run behaviour and does not encourage people to dwell or use town centres for longer periods of time.	Noted - amended	TP9(d) amended to restrict policy only to non-town centre developments
TP10	Hertfordshire County Council	1.12 Para 3.5.6.5 – <u>Policy TP10</u> – This policy supports Shaping Stortford and the Herts Speed Management Strategy and therefore we support this fully.	Noted	Policy Supported
TP11	Hertfordshire County Council	1.13 Para 3.5.6.5 – <u>Policy TP11</u> – HCC fully supports this policy.	Noted	Policy Supported
GY4	Hertfordshire County Council	1.14 General – The placement of policy GY4 ahead of sustainable travel policies (GY5 and GY6) gives the impression that this is the priority. HCC would suggest that policies referring to sustainable travel and placed ahead of vehicular policies, aligning to Policy 1 of LTP4.	NOTED	no view on this specific point
Goods Yard	Hertfordshire County Council	1.15 Station Road Footbridge – HCC would support more walking and cycling opportunities over and within the area of Station Road Bridge, the delivery of these improvements is still being considered and is subject to securing the funding and land ownership rights.	NOTED - generally agreed	HCC always put the caveat about being subject to securing funding and land ownership rights but this problem has existed for many years and HCC have not given sufficient priority to resolving the problem
GY3	Hertfordshire County Council	1.16 Paragraph 3.2.4.4 – Policy GY3 – HCC would suggest that any new taxi rank facilities or vehicular pick-up/drop-off points are placed so that sustainable modes can be prioritised. If possible, this should be away from the immediate station frontage.	NOTED - Agreed	I have no problem with this suggestion
Transport	Hertfordshire County Council	1.17 Paragraph 3.2.6.2 – Allowances should be made if any part of the development makes provision for sustainable transport. The de facto choice should not be to provide the maximum level of car parking, as this would likely reinforce car dependent behaviour.	Noted - Refers to Parking Policies for Goods Yard Development. See NP All Saints, Central, South and Parts of Thorley (Revision) Sites Policies	Good Yard policies have not been amended in the Revision - site now in development. See also response to HCC Comment no. 221 above.
Goods Yard	Hertfordshire County Council	1.18 Paragraph 3.2.6.3 – HCC would seek clarification on what is considered to be a 'reasonable area'. Cycle parking should be considered in the same manner as vehicular parking in any case.	NOTED -	I have no problem with this suggestion
GY5	Hertfordshire County Council	1.19 Paragraph 3.2.6.3 – Policy GY5 – Again, the de facto choice should not be to increase parking provision on the site if sustainable transport measures can be reasonably accommodated. HCC also has reservations on element g) as elevated infrastructure can create severance and maintenance issues.	NOTED - However in real world , given that such parking is predominantly for commuters from out of town mainly in villages without adequate bus services, there is a need for parking on site.	as stated lack of adequate bus services in surrounding villages served by the station
GY6	Hertfordshire County Council	1.20 Paragraph 3.2.7.2 – Policy GY6 – The routes presented as part of GY6 seem to be a missed opportunity to suggest how the Goods Yard would connect with the rest of Bishop's Stortford. For example, route 7 stops at the Station Road bridge and does not present how this would link to South Street, and how it integrates with any proposals coming forward such as pedestrianisation. Further thought should be given to as to how these links to provide a more strategic link. HCC does however agree that circuitous and inconvenient routes should be avoided.	NOTED - Agreed , question is how to provide a satisfactory bus service that does not have increased travel times to get from a-b	This is the problem with being a local hub both for commuters, shoppers and workers from both villages and outlying estates
BSS4	Hertfordshire County Council	1.21 Paragraph 3.3.3 – Policy BSS4 – HCC agrees that we should be consulted upon in respect of travel plans and transport assessments arising from the site. We consider that in respect of element b) further emphasis should be placed on how pedestrians, cyclists and public transport will be accommodated as part of access points. Additionally, we do not agree with element e) as providing for a large drop-off and pick up area would likely further compound the issues of vehicular movements to schools. Instead the priority should be providing for safe pedestrian and cycle routes, with accommodation for buses if required. A school travel plan should also be a key consideration for any new educational facilities, which includes collaboration with the local community.	NOTED	The drop off/pick up areas were mainly for bus travel as there is a dedicated bus entrance from Whittington Way. As pupils for this school come from a very wide area it is inevitable that parents will drop their children off at school. Whilst we can encourage public transport use, experience would show this is not widely used. If there is not a safe, suitable area for parents to use they will inevitably park in surrounding residential roads.
BSHS2	Hertfordshire County Council	1.22 Paragraph 3.4.4 – Policy BSHS2 – HCC considers that further opportunities to connect the development to the town centre beyond utilisation of the Spinney should be investigated given the personal security and safety issues surrounding active travel links which traverse green spaces. This could include measures to improve walking and cycling conditions on London Road.	NOTED	To improve conditions on London Road would really be the responsibility of Herts Highways. With all the extra traffic movements from Bishop's Stortford South and the High School Site it would be extremely difficult. London Road is not wide enough for a dedicated cycle lane.
CC1	Hertfordshire County Council	2.23 Paragraph 3.1.2.3 – Policy CC1 – HCC would suggest that transport is considered as part of this policy, as it is the main contributor to carbon emissions in the UK and Hertfordshire. One suggestion could be the intention to promote sustainable transport (in addition to the transport objectives), particularly active travel, to contribute to a reduction in emissions.	NOTED	Sustainable travel is dealt with in the Transport section
Housing and Design	Hertfordshire County Council	1.1 HCC have the following comments and recommendations with regards to (Objective) 3.2.5 and draft Policy HDP6 – Archaeology as contained in the consultation document <i>Neighbourhood Plan for Bishop's Stortford and Part of Thorley Parish (1st Revision) – Shared Policies 2020-2032</i> .	NOTED	This is introductory not a comment
Housing and Design	Hertfordshire County Council	1.2 Further, HCC note that this is a limited revision of the two Bishop's Stortford Neighbourhood Plans (Silverleys and Meads and All Saints, Central South and Part of Thorley Neighbourhood), to align the two plans as closely as possible, with policies as identical as possible, where achievable. HCC also note that the content of (Objective) 3.2.5 Protect and enhance newly discovered archaeological site, and draft policy HDP6 – Archaeology is unchanged from those contained in the All Saints, Central, South and part of Thorley Neighbourhood Plan 2016-2032, adopted in October 2017	NOTED	This comment supports the plan and does not suggest a change

Ref	Name/Organisation	Comment	Action Taken	Reason
Housing and Design	Hertfordshire County Council	1.3 HCC recommend that the word 'newly' should be removed from the Objective, since its inclusion makes no provision for the future discovery of currently unknown archaeological sites (heritage assets of archaeological interest) within the two Neighbourhood Plan areas. The Objective should read 'Identify, protect and enhance archaeological sites'.	Suggestion adopted	HCC have provided a sound rationale
HDP6	Hertfordshire County Council	1.4 <u>Policy HDP6 – Archaeology</u> : HCC welcome the recognition that appropriate contributions should be sought from NOTED developers to ensure the curation of new archaeological finds contained in clause a).		This comment supports the plan and does not suggest a change
Housing and Design	Hertfordshire County Council	1.5 However, for consistency with Objective 3.2.5, the policy should also make appropriate reference to the protection and enhancement of local sites of archaeological interest, and to the investigation of new development sites with archaeological potential.	Noted	This appears to be an introduction to ref 240
HDP6	Hertfordshire County Council	1.6 HCC recommend that an additional clause is added to draft policy HDP6 regarding the identification and protection of local sites of archaeological interest and their investigation and enhancement where appropriate, and also the archaeological investigation of sites where new developments or improvements are planned, as per 3.2.5.1.	Noted	Policy HA3 in the Local plan covers this already
Education	Hertfordshire County Council	1.1 Para 3.6.1.4 refers to only 52% of the schools' intake for secondary in 2015 being from the town. This is approximately 6 years out of date, HCC can either provide an updated figure, or it should be removed as data this old may not be reflective of the current situation.	Sentence amended to include more up to date information provided by HCC	See attached from Ben Bowles, 22/4/2021: My Children's Services colleague has provided the following: "On allocation day (1 March) for the 2021 academic year, of 992 places allocated at the 5 BS Secondary schools, 523 (52%) were offered to children living in the parish of Bishops Stortford." Many thanks Ben
Education	Hertfordshire County Council	1.2 Para 3.6.3.4 States 'Finally, new all-through schools and primary schools must incorporate pre-school settings.' Whilst the county council would generally seek nursery provision within new primary schools, the county council utilises a diverse range of early years settings to meet its statutory duties and it does not consider that the NP's are the place to require this.	Sentence deleted	The comment is fair
EP3	Hertfordshire County Council	1.3 <u>Policy EP3 part B</u> 'School places should be available ahead of residential occupancy and in any case no later than the academic year in which 25% occupancy is anticipated.' HCC would ask that this sentence is removed. As the Local Authority responsible for education, HCC has a statutory duty to secure sufficient school places. When additional places are provided and how they can best meet local need is considered alongside the timing of future demand and existing provision in the local area. Decisions on establishing new schools rests with the Secretary of State, supported by evidence of a minimum viable number of pupils to ensure future viability. This risks contradicting the requirement of this policy.	Sentence removed	The comment is reasonable and appropriate
EP7	Hertfordshire County Council	1.4 <u>Policy EP7</u> The NP states 'b) Additional secondary schools should not be considered without HCC first demonstrating that the 16-19 vocational education and training needs can be met locally. c) Proposals for new school accommodation will be required to be designed to accommodate adult and vocational education and/or community use outside of school hours unless it can be demonstrated that this is either not practical or not viable'. HCC do not think it is appropriate for these requirements to be incorporated in the NP's. Part a) of this policy is sufficient to cover the view that this type of education facility is desired, however the Local Authority will always take account of the needs of the area when any new education provision is proposed.	Noted	HCC views are noted however this responds to a specific local need identified by local headteachers and through consultation
Transport	Hertfordshire County Council	5.1 HCC would like to stress the importance of the Local Transport Plan (LTP4) and its sustainable travel policies and broadly supports the policies that underpin this in the preparation of the NPs. As proposed, local centres within the town are intended to be accessible by walking and cycling and from surrounding villages to the wider key destinations within the town with reliable and affordable public transport to avoid congestion and improve air quality. Transport infrastructure that can adapt to new technologies and changing habits must be recognised and facilitated for. A fully integrated public transport network that connects within and beyond the Town must be envisaged and the ultimate aim.	Noted - conclusion broadly supported by the NP Transport Policies	See amendments to bring policies further in line with LTP4 policies. The objective is to 'adopt' appropriate LTP policies for Bishop's Stortford - which are a material consideration in determining planning applications - into the NP which forms part of the Development Plan.
	Hertfordshire County Council	5.2 In addition, HCC welcome the policies to help protect the impact of development from an historic environment perspective. 5.3 HCC welcome the opportunity to comment on the NP, and are looking forward to continuing working with the LPA, and other stakeholders, including the existing and emerging communities in the shaping of Bishop's Stortford	NOTED	This comment supports the plan and does not suggest a change
Waste Management	Essex County Council	In light of the fact that this area of the Neighbourhood Plan is within a WCA, the following wording could be added to the planning context section. "An area in the East of the Neighbourhood Plan is within a Waste Consultation Area (WCA) due to the presence of a Water Recycling Centre (WRC) in Essex. Any proposals for non-mineral development coming forward in land designated as a WCA are subject to a Safeguarding Waste Management Sites and Infrastructure policy (Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017), which seeks to ensure that existing and allocated waste sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation."	NOTED	This is a legal requirement so does not need to be restated here

Ref	Name/Organisation	Comment	Action Taken	Reason
Waste Management	Essex County Council	<p>Policy 2 of the WLP seeks to ensure that existing and allocated waste sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation. Policy 2 defines Waste Consultation Areas as extending up to 250m from waste management facilities (extending up to 400m for Water Recycling Centres). As can be seen from Map 1 below, Stortford Sewage Treatment Works (Jenkins Lane, Great Hallingbury, Bishops Stortford, Hertfordshire, CM22 7QL) is in the west of Essex and the Waste Consultation Areas (WCA) falls within the Bishop's Stortford Neighbourhood Plan Area. Its location means that any applications that fall within the WCA would be subject to Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP). Where applications of a nature not specifically excluded by Policy 2 are submitted for determination by Bishop's Stortford Town Council, the MWPA are required to be a consultee. The MWPA will likely object to applications until it is satisfied that the development will not cause operational constraints on the existing waste management facility.</p> <p>Please note that MSAs and WCAs are not intended to be a barrier to all potential future development, rather they seek to ensure that the Minerals and Waste Planning Authority are consulted on non-minerals and non-waste development that could adversely impact on the operation of a safeguarded mineral or waste site, or associated infrastructure. They also ensure that potential future development is not adversely affected by existing or future mineral and waste developments</p>	NOTED	This coment is an important piece of information but does not appear to suggest a change to the plan
Environmental Policy	Environment Agency	<p>We aim to reduce flood risk, while protecting and enhancing the water environment.</p> <p>We have identified environmental constraints within your plan area however as no growth is proposed, we have no detailed comments to make at this stage. Should the aspiration of the plan change, please consult us so that we can provide appropriate comments.</p> <p><u>General Opportunities</u> Drawing up a neighbourhood plan is an opportunity to think about improving the local environment. General opportunities for neighbourhood planning include:</p> <ul style="list-style-type: none"> • New green spaces or improvements to public space through new development. This could include linking open spaces to make green corridors for people and wildlife, planting trees, or making improvements to water quality and waterways. • Recognising the value of certain environmental features within a plan to help bring forward environmental projects without development to help secure wider funding. • Helping a community to manage the risk of flooding by providing landscaping to manage and store water, and by promoting sustainable drainage systems. • It could also help to encourage energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for those using the building. This will also help addressing the issue of unsustainable water consumption. <p>We encourage you to seek ways in which your neighbourhood plan can improve the local environment. 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.</p>	NOTED. Many of the matters mentioned here are included in the revised NPs.	Information only
CC3	East Herts District Council	<p>The use of the term 'mitigate against' should ideally be changed to either 'militate against' or 'mitigates the negative impacts of climate change.'</p> <p>It may also be worth finishing with the term in the last sentence '...that outweigh the benefits'.</p>	Agreed to change	changed to 'mitigates the negative...'
HDP1	East Herts District Council	<p>Criterion a) – consider deleting the first sentence which does not add anything further than existing planning policy and regulations. The 2nd sentence doesn't appear to be justified, is it supporting new significant development proposals alongside that already identified in the District Plan 2018? Perhaps this criterion would be better being replaced with a criterion that simply supports brownfield redevelopment opportunities.</p> <p>Criterion b) – Is it realistic to expect all development proposals to incorporate the principles of Garden Cities? Likewise, the document doesn't appear to define the 'built up area' at any point or provide justification for why this is the appropriate measure for including/excluding garden city principles.</p>	a) deleted. b) amended to read brownfield re-development shall be supported subject to the achievement of high quality design that meets the requirements of other policies and does not compromise to an unacceptable level the amenity value in either neighbouring properties or for the future occupiers of the proposed development.	Comments are fair in the context of the Local Plan 2018 which was not published at the time the current NPs were made

Ref	Name/Organisation	Comment	Action Taken	Reason
HDP2	East Herts District Council	<p>Criterion a) – second sentence states “Such schemes will require special sensitivity in recognising the significance of their historic settings to be supported” it is unclear what action the decision-maker is required to take with this sentence.</p> <p>Listed buildings are protected from demolition by relevant legislation and this policy does not align with that. It provides a lower test than the relevant legislation which is also not appropriate – consider deleting.</p> <p>Criterion b) – first sentence is vague, consider rewording.</p> <p>First bullet: Unsure whether or not the first bullet point is suitable as we were unable to find the link to the document described in Appendix 5 (appendix 5 doesn't appear to exist).</p> <p>Second bullet: it would be too arduous to expect all developments – particularly those smaller extensions etc. to meet Building for Life 12 green scores. Consider rewording.</p> <p>Fourth bullet: whilst the sentiment of this bullet is understood it should be reworded for absolute clarity to ensure that it achieves what the policy writer intends.</p> <p>Criterion c) – the term ‘can be used’ should be deleted and replaced with ‘will be supported’.</p>	<p>reqorded to read</p> <p>a) For all development proposals in and adjacent to the Conservation Areas, schemes must follow the relevant styles and materials set out in the Conservation Area Character Appraisal. Proposals for such schemes will be expected to demonstrate that the significance of the historic setting has been considered and sensitively factored into the design. Schemes involving the demolition of unlisted buildings that make a positive contribution to the Conservation Area, as denoted in section 7 - Management Proposals in the Conservation Area Appraisal, will not be supported except where the contribution from replacement buildings is comparable or better, or where the public benefit of the replacement scheme in terms of its appearance and design or the viable use of the site outweighs the harm.</p> <p>b) Developments will be expected to be of high quality and to sit well within their setting. Proposals for major schemes shall, unless demonstrably unviable:</p> <ul style="list-style-type: none"> • Follow the Character Management principles described in Appendix 3, depending on the Townscape Character Area (TCA) of the site. • Be accompanied by a Building for a Healthy Life 12 (formerly Building for Life 12) Assessment. The expectation is that schemes will score green or amber against all applicable criteria. An amber score will only be acceptable where it is accompanied by a clear justification in terms of local circumstances or viability explaining why a green score cannot be achieved. • Demonstrate that buildings, streets and spaces relate well to their 	<p>To clarify and deal with the valid points made</p>
HDP3	East Herts District Council	<p>First bullet: Again, Appendix 4 doesn't appear to provide a glossary.</p> <p>Criterion b) – assume that terms ‘south-east’ and ‘south-west’ refer to the orientation of buildings – this is unclear. First sentence uses the term ‘encouraged’ – it is unlikely that the decision-maker will ‘encourage’ developers to incorporate solar energy generation, consider re-wording.</p>	<p>Reference to appendix changed</p> <p>Reworded to read "b) On sites where the orientation of the buildings can reasonably facilitate roofs which face 45 degrees or less either side of due south, developers must consider the incorporation of solar energy generation. On all sites the use of solar energy or other sources of renewable energy will be supported, where it does not conflict with other development plan policies. '</p>	<p>To clarify as suggested</p>
HDP4	East Herts District Council	<p>Criterion a) – requires that developments of five or more homes must submit a dwellings mix strategy that covers affordable housing. This conflicts with paragraph 63 of the NPPF which states that affordable housing isn't sought on developments that aren't major developments. Likewise, is the ‘objectively identified needs’ of Bishop's Stortford defined anywhere? Unsure whether this criterion goes any further than District Plan Policy HOU1, therefore consider deleting.</p> <p>Criterion b) – again, ‘all schemes’ are not required to provide affordable housing as set out by the NPPF. The Affordable Housing SPD adopted by the District Council in 2020 also sets out the much of what is set out in this criterion – consider deleting as unnecessary duplication.</p> <p>Criterion c) and Criterion d) – both of these criterion need to be reworded and re-thought as the expectation that ‘all schemes’ must consider both bungalows and self-build funding opportunities is an arduous burden and unrealistic.</p>	<p>Reworded as follows:</p> <p>a) amended to apply to major schemes</p> <p>b) amended to reference and require demonstration of conformity to the SPD where criterion a is met</p> <p>c) Proposals for major development schemes must demonstrate that unfulfilled demand for bungalows has been considered. Developers of such schemes must justify on firm evidence, for reasons other than just viability, why a site is not suitable for bungalows.</p> <p>d) Proposals for major development schemes shall demonstrate that alternative types of purchase funding such as self-build for market housing, have been considered. The Self-build Register should be used to assess the level of demand in an area to determine the proportion of land given over to such type of building, along with other relevant factors such as the size, position, accessibility and terrain of the site.</p>	<p>a) comment made is appropriate and 'major' = 10 or more so intent is still preserved</p> <p>b) The SPD did not exist at the time the original plan was made and a reference to it is now wholly appropriate</p> <p>c), d), commenst are reasonable so the requirement has been clarified and restricted to major schemes.</p>
HDP5	East Herts District Council	<p>Criterion a); fourth bullet – terminology is vague, a decision-maker is unlikely to share the same or consistent definition of what constitutes a ‘non-institutional, safe and stimulating design’. Consider either expanding or providing examples so that the objective of the policy is clear to the decision-maker.</p>	<p>Bullet deleted</p>	<p>Difficult to make this objective and comment is reasonable</p>

Ref	Name/Organisation	Comment	Action Taken	Reason
HDP6	East Herts District Council	Slightly unclear what this policy is trying to achieve and how a decision-maker is meant to apply this to any development. Appears to be referring to the way that archaeological findings are managed rather than the impacts of development – consider revising.	reworded to read a) Should new archaeological finds occur or be expected to occur as part of a development, that are worthy of reclamation or display, an appropriate contribution will be sought from the developers towards the costs of whatever methods are deemed by Hertfordshire County Council and/or Bishop's Stortford Museum to be most appropriate to curate, reclaim or display the finds.	Clarifies the intent which is that S106 money will be sought to enable finds to be appropriately treated
TC1	East Herts District Council	This policy appears to be a policy that refers to how other policies function. Individual policies should describe clearly and succinctly how the decision-maker is to act, as such this is unnecessary – consider deleting.	Policy to be amended to Development proposals in Bishop's Stortford Town Centre should have regard to the Bishop's Stortford Town Centre Framework and demonstrate broad compliance with the design guidance	Amended to be clearer in what is required.
GIP1	East Herts District Council	Criterion a) – it is not realistic to expect that 'all' major developments should provide a meaningful increase in existing green infrastructure. Major development is defined in the NPPF as housing developments of 10 or more homes so the expectation that they provide public green infrastructure is unlikely to be realistic. Likewise the terminology '...increase in the <i>existing</i> green infrastructure...' doesn't make sense as new development is unlikely to be able to increase that which already exists. Consider revising. Criterion b) – Green Infrastructure is defined in the glossary of the NPPF – unnecessary duplication that creates confusion and variation – consider deleting. Criterion c) and d) – these criterion together with the guide calculation present an overly prescriptive and unclear expectation to the developer and decision-maker alike.	Preamble text amended to include references to East Herts Sustainability SPD confirming importance of enhancing green infrastructure and explaining removal of proposed % increases to be proved by development. The term 'enhancement' is used (as in the SPD) rather than the more prescriptive 'increase'. Policy GIP1 amended accordingly but requirement for developers to assess their proposals, qualitatively and quantitatively, for enhancement of green infrastructure strengthened, including referring to net gain in biodiversity to be achieved.	To address problems with applying percentage increase in green infrastructure to all major developments
TP2	East Herts District Council	Criterion a) – small update required to note that the Sustainability SPD has now been adopted. Criterion b) – would a decision-maker be able to understand what is defined as 'responsible planting' of trees as opposed to the irresponsible planting of trees?	a) Agreed	b) Agreed a) Replace "emerging" with "adopted" b) Delete "responsible"
TP3	East Herts District Council	This Policy could also utilise Hertfordshire's Local Transport Plan (LTP4) as the goals align. Criterion b) – whilst the sentiment is understood, it is unclear what this policy is asking the decision-maker to do should a development be either within/outside these distances. Criterion c) – should add the words 'where possible' as viability often restricts this opportunity.	Noted clarification required	b) Noted - Para 3.5.3.5 references LTP4 Policy 1 on sustainable transport TP3 b) Change "for" to "and adopt measures to achieve"
TP4	East Herts District Council	Criterion a) – refers to major developments 'shall deliver pedestrian and cycle improvements' – this is vague as most major developments will have to provide a limited amount of pedestrian connections. The term 'improvements' should be clearly explained or defined. Criterion b) – consider changing the term 'encouraged' to 'supported' as encouragement isn't something that a decision-maker will offer. Criterion e) – the first sentence appears to apply a policy to how motorists are to behave and therefore isn't a land-use policy – consider deleting.	(a) Noted c)Not Agreed	(b) Agreed Policy TP4(a) is policy positioning; improvements identified in (b) to (h) Policy TP4(b) Replace "supported" with "expected" Policy TP4(e) - first sentence references section 8 of (now) adopted Sustainability SPD which is a land use policy document. This is intended to provide the justification for design changes at junctions in the second sentence to deliver behavioural change.
SLCP3	East Herts District Council	Criterion a) – again the use of the term 'encouraged' should be changed to 'supported' (as is used in criterion b)).	Changed as suggested	Appropriate comment
SLCP5	East Herts District Council	Sports facilities are already considered to be an exception to inappropriate development in the Green Belt by the NPPF. It is further likely that other policies in the District Plan and the Bishop's Stortford Neighbourhood Plan will cover elements such as demand and scale/massing which would render this policy a duplication of existing policy.	NOTED	This may be a duplication but at the same time it is important to state
TC1	East Herts District Council	The phrase "Any development which cannot demonstrate compatibility must be capable of being resolved" does not provide the decision-maker with any clarity regarding how they need to act, nor does it explain what 'capable of being resolved' means or the time limit on this. Consider revising.	Policy to be amended as above	Amended to be clearer in what is required.
TC2	East Herts District Council	This Policy repeats that set out in Policy BISH8 and does not add anything different to that or Policy DES1 in the District Plan, consider deleting.	NOTED - Policy stays as is apart from punctuation changes referred to previously	Policy TC2 reinforces what is stated in BISH 8 which to date has not been complied with either insofar as no SPD has yet to be made nor has there been any proper consultation and works have already been commenced on the car park
District Plan	Bishops Stortford Civic Federation	Parts of the revised NP include reference to an emerging District Plan e.g. 2.2.1.1, and other emerging plans. If this is the District Plan adopted in 2018 it would be helpful if these references were updated.	All instances of 'emerging District Plan' have been removed.	Correction
Town Centre	Bishops Stortford Civic Federation	Similarly several sections, e.g. 3.9, have not been updated to include the progress on developments, changes in business and entertainment, sustainable travel actions, etc. since the original NP1 and NP2 were written, e.g. developments approved and their progress, commerce, business and recreational and entertainment changes since NP1 and NP2, especially since Covid-19. Specific examples of developments include: Launchpad, Charrington House (3.9) Grange Paddocks sports and leisure (3.2.3.2). Specific examples of independent and businesses chains that have gone include: Zizi's Market Square and Halfords, South Street. There have also been SSSG's sustainable travel initiatives and the failed Sustainable Town bid (note the many references to extra parking in the town centre – 3.5, which is counter to Sustainable Town eligibility criteria.)	Noted -Policy TC1 both as originally drafted and as amended extend the description of of the Town Centre to take in the the area covered by the Townb Centre Framework thus including everything from Old River Lane to South Mill Arts	For completeness of what is de facto the Town Centre

Ref	Name/Organisation	Comment	Action Taken	Reason
Climate Change	Bishops Stortford Civic Federation	BSCF welcomes the introduction of the new Climate Change policies (Section 3.1)	Noted	good to have this support
Green Infrastructure	Bishops Stortford Civic Federation	BSCF welcomes the introduction of the Green Infrastructure section and policies (Section 3.4), especially the new link in GIP1 to adapting to climate change and adding new Local Green Spaces, Community Orchard and Allotments. In that respect we would welcome strengthening of policies aimed at protecting small green spaces, wooded areas and hedgerows on old and new developments such as on Thorley Park and Bishop's Stortford South, land between the River Stort and Rye St, close to Grange Paddocks, and in Bishop's Stortford North (especially Hoggate's Wood) and South of Hadham Road (especially Skelley's Wood); e.g. ensuring they are in or are brought into relevant local authority ownership.	NOTED. The revised Neighbourhood Plans provide protection to a considerable number of additional green spaces including some mentioned in this response. Others mentioned are already protected by being designated as Local Green Spaces in East Herts Distirct Plan 2018 - including areas between the Stort and Rye Street and Hoggate's Wood. Bishop's Stortford South is currently being developed under existing planning consents. It may be appropriate to add green spaces on this site or other specific locations identified by the community to the next revision of the Neighbourhood plans.	The response is supportive of the revised NPs.
Transport	Bishops Stortford Civic Federation	BSCF wellcomes the new approach for the Transport policies (Section 3.5) – particularly: i. TP1's approach to managing and mitigating the impact of housing development on the town's existing residents' amenity, ii. Greater community engagement in TAs and support for the User Hierarchy to encourage sustainable travel modes.	Noted	Supports Transport Policies
BSS1	Bishops Stortford Civic Federation	BSCF would like to see the policy BSS1 being applicable to all developments where master-planning is part of the development process.	NOTED	And all stakeholders to be invited to the Masterplanning meetings to give their views before a Masterplan is made!
Town Centre	Bishops Stortford Civic Federation	BSCF would like to see the extension of the town centre area to cover the whole of the town's central business and entertainment area, i.e. north, to the north side of Hadham Road and the Northgate End car park, south to South Mill Arts, South Mill Trading Centre and the business areas of the Goods Yard, and east to Hockerill. Arguably, as a result of this the town centre should allocated to one of the NP documents and not split between it. Realistically this should be the area most within the Conservation Area.	Noted - That is why using the Bishop's Stortford Town Centre Planning Framework as the basis for following guidance we incorporate an area from Old River Lane to South Mill Arts	To ensure rationalisation across the whole of the de facto Town Centre
Town Centre	Bishops Stortford Civic Federation	BSCF would like to see the strengthening and development of Section 3.10 - Town Centre and ORL which: i. Lacks a preamble setting out recent changes and present developments in the town centre, the impacts of Covid-19 on it, and linkages to other relevant sections of the NP, e.g. Section 3.9. Thus the reasons for and objectives of the policies TC1 Town Centre Planning Framework (TCPF) and TC2 Old River Lane (ORL) are not clear. In particular: • Policy TC1 is undeveloped, and refers only to design, omitting consideration of or reference to other aspects of, post Covid-19, recreating and maintaining the thriving healthy and thriving retail (and services) environment in the town centre, as stated in 3.9.1.9. • Policy TC2 is only about a SPD for Old River Lane, whereas, arguably an SPD is needed for the whole of the town centre, to achieve an integrated development plan rather than a piecemeal one. This is evidenced by the current Jackson Square's developers plans to close the Bridge Street entrance to Jackson Square despite its value as a step-free connection to the north and east of the town and, potentially day-time users of the ORL development. ii. A policy calling for a SPD for the whole of the [extended] town centre (see 3.(b) above) should be included and not just one for ORL.	Noted - no action required as TC1 both as originally written and as amended states that the Bishop's Stortford Town Centre Planning Framework should be followed and this extends the designation of the Town Centre to run from Old River Lane to South Mill Arts. As to date the Supplementary Planning Document referred to in the District Plan as proposed has still not been made we can only state that it should be followed The Supplementary Planning Document referred to in the District Plan is the same one requiring the Planning Framework to be made and its relevance is in attempting to ensure that proper consultation is undertaken before any development takes place which so far has not happened as regards the multistorey car park	The intention is to provide observance with what was proposed in the District Plan but not so far adhered to
Transport	Bishops Stortford Civic Federation	BSCF would like to see the a clearer Transport Strategy for the town (which the Transport Options study 2019 did not deliver) and making better use of roads such as the by-pass, to keep through traffic out of the town, thus creating more space and capacity for sustainable travel in the town. (This has largely been set out in BSCF's response to Hertfordshire's EAGTP (see attached)). The traffic impacts of centralising much of the town's primary healthcare services at Herts & Essex Community Hospital should be part of this.	Noted - see additional text in section 3.5.1	Additional paragraphs added on a strategic approach to improving the accessibility and connectivity of the town. See additional paragraphs 3.5.1.7 - 9 and revised para. 3.5.7.5 on emerging GTP.