Stanstead Abbotts and St Margarets Neighbourhood Development Plan 2017-2033

A report to East Herts District Council on the Stanstead Abbotts and St Margarets Neighbourhood Development Plan

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Executive Summary

1 I was appointed by East Herts District Council in May 2025 to carry out the independent examination of the Stanstead Abbotts and St Margarets Neighbourhood Plan.

2 The examination was undertaken by written representations. I visited the neighbourhood area on 6 June 2025.

3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on three matters. The first is the Plan's allocation of sites for residential development. The second is the proposed designation of a series of Local Green Spaces. The third is securing high quality design.

4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.

5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.

6 I recommend that the referendum area should coincide with the designated neighbourhood area.

Andrew Ashcroft
Independent Examiner
7 October 2025

1 Introduction

1.1 This report sets out the findings of the independent examination of the Stanstead Abbotts and St Margarets Neighbourhood Development Plan 2017-2033 ('the Plan').

1.2 The Plan was submitted to East Herts District Council (EHDC) by three parish councils (Stanstead Abbotts, Stanstead St Margarets, and Great Amwell). For this report I refer to the qualifying body as Stanstead Abbotts Parish Council (SAPC) in its capacity as the lead parish council responsible for preparing the neighbourhood plan.

1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.

1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.

1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance, and that new development is designed in a positive way.

1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.

1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then become part of the wider development plan and be used to determine planning applications in the neighbourhood area.

2 The Role of the Independent Examiner

2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.

2.2 I was appointed by EHDC, with the consent of SAPC, to conduct the examination of the Plan and to prepare this report. I am independent of EHDC and SAPC. I do not have any interest in any land that may be affected by the Plan.

2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:

(a) that the Plan as submitted should proceed to a referendum; or
(b) that the Plan should proceed to referendum as modified (based on my recommendations); or
(c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

2.6 In examining the Plan, I am required to check whether:

- the policies relate to the development and use of land for a designated neighbourhood plan area; and
- the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
- the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan (and its appendices)
- the Basic Conditions Statement.
- the Consultation Statement.
- the Environmental Report
- the HRA report
- the Evidence Base
- the representations made to the Plan.
- SAPC's responses to the clarification note.
- EHDC's response to the clarification note.
- the East Herts District Plan 2018.
- the National Planning Policy Framework (December 2023 and December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 6 June 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations, I concluded that the Plan could be examined by written representations. I was assisted in this process by the comprehensive nature of many of the representations.

The update of the NPPF

3.4 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.5 The Plan was submitted to EHDC in December 2024. On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

3.6 Paragraph 6.2 of this report sets out full extent of the basic conditions against which a neighbourhood plan is examined.

4 Consultation

Consultation Process

4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.

4.2 In accordance with the Neighbourhood Planning (General) (Amendment) Regulations 2012, SAPC has prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is underpinned by a series of appendices. It reproduces elements of the consultation leaflets used during the overall process and includes photographs taken at some of the events. This helps to bring life and depth to the overall document.

4.3 Sections 4/5/6 of the Statement records the various activities that were held to engage the local community and the feedback from each event. The Statement summarises the comments received from these exercises and how they fed into the pre-submission Plan. This is best practice.

4.4 The Statement also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (February to April 2023). Section 7 advises about organisations and the public were advised about the Plan. Section 8 (and appendices 26-29) advises about the comments received on that version of the Plan along with commentary about the way in which the Plan was refined because of this process.

4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. EHDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

4.6 Consultation on the submitted plan was undertaken by EHDC. This exercise generated representations from the following organisations:

- Sport England
- North East Herts Swift Group
- Great Amwell Parish Council
- Webster Estates Limited
- Historic England
- Hertfordshire County Council (Property)
- East Herts District Council (Design and Conservation)

- Network Rail
- Cllr Geoff Hayter (SAPC)
- Lee Valley Regional Park Authority
- Catesby Estates
- Hertfordshire Gardens Trust
- Essex County Council
- East Herts District Council (Housing)
- Rye House Action Group
- Virgin Media
- Canal and River Trust
- The Roydon Society
- Swifts Local Network: Swifts & Planning Group
- Hertfordshire County Council - Minerals and Waste
- Hunsdon Parish Council
- Hertfordshire County Council (Highways and Lead Local Flood Authority)
- Thames Water
- Natural England
- Environment Agency
- Highways Agency

4.7 Representations were also received from several people living in the neighbourhood area. In some cases, they offered support for the Plan. In other cases, they questioned the need for the release of land from the Green Belt. I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

5.1 The neighbourhood area consists of the parish of Stanstead Abbotts, the parish of Stanstead St Margarets, and part of the parish of Great Amwell. Stanstead Abbotts and Stanstead St Margarets are located the southern edge of East Herts District adjacent to the boundary with the Borough of Broxbourne. Great Amwell is located to the north and west of Stanstead St Margarets. The eastern edge of the neighbourhood area is partially alongside the boundaries of Epping Forest District and partially of Harlow Town in Essex. The Greenwich Meridian runs through Stanstead St Margarets. The neighbourhood area was designated on 11 September 2018.

5.2 There are four rivers in the neighbourhood area - the River Lea, (and the River Lea Navigation) the Stort, the Ash and the Mill Stream flowing into the Lea. There is also a section of the man-made New River. Much of the village is low-lying. In this broader context there has been considerable extraction of sand and gravel. This has resulted in several lakes and associated bird and wildlife reserves.

5.3 Stanstead St Margarets and Stanstead Abbotts are located on either side of the River Lea Navigation and the parallel railway line. Stanstead Abbotts is a popular and attractive village based along High Street. It enjoys a range of primary facilities including a dentist surgery and shops. It enjoys good transport links to London and Hertford. Great Amwell Parish lies to the north of Station Road and the main settlement is to the west of the River Lea. The parts of Great Amwell parish in the neighbourhood area include the 1950s built estate known as The Folly, the 1980s development which replaced an old maltings, known as Riversmead, and some additional dwellings including a development on an old timber yard. In the round it is an interesting area within which to prepare a neighbourhood plan

Development Plan Context

5.4 The East Herts District Plan was adopted in 2018. It sets out the planning framework for the District from 2011 to 2033 with an overall requirement to deliver 18,458 homes during the Plan period.

5.5 Policy VILL1 of the District Plan identifies Stanstead Abbotts and St Margarets as a Group 1 Village with a 10% growth target of 94 homes projected from 2017 to 2033. It advises that where a need for changes to the Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

5.6 Paragraph 4.5.1 and Policy GBR1 of the District Plan advise that several villages, including Stanstead Abbotts and St Margarets are inset from the Green Belt. The Plan advises that the strategic growth required for these settlements is encouraged to be accommodated in the respective neighbourhood plans, and where this would involve changes to Green Belt boundaries EHDC will consider making these amendments either through a review of the District Plan or through a separate Site Allocations Development Plan Document.

5.7 The other strategic policies in the District Plan have had a bearing on the preparation of the submitted Plan:

- DPS1 (Housing, Employment and Retail Growth)
- DPS4 (Infrastructure Requirements)
- HOU1 (Type and Mix of Housing)
- HOU2 (Housing Density)
- HOU3 (Affordable Housing)
- ED1(Employment)
- WAT1 (Flood Risk Management)
- WAT6 (Wastewater Infrastructure)

5.8 In this broader context, SAPC has carefully produced a Plan which seeks to complement the existing development plan. In addition, the submitted Plan has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the neighbourhood area

5.9 I visited the neighbourhood area on 6 June 2025. I approached it from the A10 to the west. This helped me to understand its position in general and its accessibility to the strategic road network.

5.10 I looked initially at the River Lea. I saw its importance to the neighbourhood area. I saw the opportunities for informal recreation along the footpaths and the extensive local green spaces along its western side.

5.11 I then looked at the village centre. I saw its interesting range of national and commercial uses.

5.12 I then looked at the proposed housing infill sites off Abbotts Way. I also took the opportunity to walk up to St Andrew's Church and the allotments.

5.13 I then looked at the proposed residential allocation off Netherfield Lane. I saw the relationship between the site and the existing built development along Roydon Road. I also saw the relationship between the brownfield part of the site and the surrounding greenfield land.

5.14 I left the neighbourhood area and drove to Ware to the north. This helped me to understand its accessibility to the higher-level facilities in that town.

6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.

6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).

6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Stanstead Abbotts and St Margarets Neighbourhood Development Plan:

- a plan-led system - in this case the relationship between the neighbourhood plan and the local plan context in East Hertfordshire (as described in Section 5 of this report);
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF

indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.

6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on development and environmental matters. It has a focus on designating local green spaces, promoting residential development, and ensuring that new development is designed in a positive way.

6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.

6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for the allocation of land for housing use (Policies SASM H2/H3/H4), for employment areas (Policy SASM B1) and for the High Street (Policy SASM B2). In the social role, it includes policies on the type and mix of houses (Policy SASM H6), on local green spaces (Policy SASM NE1), and on community facilities (Policy SASM CL1). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on riverside development (Policies SASM R1/R2), nature conservation (Policy SASM NE2), flooding (Policy SASM NE4), and design (Policy SASM D1). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

6.11 I have already commented in detail on the development plan context in Section 5 of this report.

6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.

6.14 In order to comply with this requirement, SAPC commissioned the preparation of an Environmental Report (ER) for the Plan. The report is thorough and well-constructed. It concludes that:

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

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

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

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

Alongside the provisions of the (District Plan) and NPPF, the (Plan) seeks to support housing delivery in line with forecasted needs over the Plan period. Positive cumulative effects are anticipated in this respect.

By delivering a level of growth planned for through the (District Plan), no cumulative impacts are anticipated in relation to broader river basin catchments and water resource management plans.'

6.15 Section 6 of the ER assesses four options to deliver the strategic housing requirement for the neighbourhood area. The analysis is based on the information in Section 5. Table 6.9 summarises the findings of the assessment of alternative options.

6.16 Section 7 of the ER advises about SAPC's reasons for developing the preferred approach as follows:

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

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

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

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

6.17 I comment on this conclusion in the part of this report which address the proposed allocation of land east of Netherfield Lane (Policy SASM H3).

Habitats Regulations Assessment

6.18 SAPC also commissioned a Habitats Regulations Assessment (HRA) of the Plan. It assesses the potential impact of the Plan's policies the two protected sites (Lee Valley SPA/ Ramsar and Wormley-Hoddesdonpark Woods SAC).

6.19 The HRA concludes that most of the Plan's policies will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects. Nevertheless the HRA screening exercise indicates that three policies in the Plan were considered to pose Likely Significant Effects for European sites alone (and will therefore also do so 'in combination' with other projects and plans) as a result of a slight increase in the number of residential units and required further assessment in terms of changes in hydrology due to abstraction for public water supply and changes in water quality due to the potential for an increase in sewage discharge. The three policies are:

- Policy SASM H2: Housing Numbers;
- Policy SASM H3: Land East of Netherfield Lane/south of Roydon Road (584m north-east of Lee Valley SPA/ Ramsar); and
- Policy SASM H4: Site H6 Chapelfields and Abbotts Way Garages (551m south-east of Lee Valley SPA/ Ramsar).

6.20 Following Appropriate Assessment, it was concluded that with the implementation of Policy WAT6 of the East Herts District Plan, the submitted Plan would contain sufficient policy framework to ensure no adverse effects on the integrity of European sites will occur in isolation or in combination with other projects and plans.

6.21 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns about these matters. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

6.22 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

6.23 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.

7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.

7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and SAPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.

7.4 The Plan has been designed to respond to Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land. The Plan includes a series of non-land use Actions.

7.5 I have addressed the policies in the order that they appear in the submitted Plan. The Actions are considered thereafter.

7.6 For clarity, this section of the report comments on all the Plan's policies.

7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Sections 1-3)

7.8 The Plan is well-organised and presented. It has been prepared with much attention to detail and local pride. The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.

7.9 The Introduction sets the scene for the Plan. It identifies the neighbourhood area (in Figure 1). Thereafter it comments about the neighbourhood area. I recommend that this part of the Plan includes commentary about the Plan period.

At the end of paragraph 1.3 add: 'The Plan period is 2017 to 2033'.

7.10 The Introduction also comments about how the community was engaged as the Plan was prepared. Finally, it comments about the neighbourhood area to good effect.

7.11 Section 2 of the Plan comments about the national and local planning context within which the Plan has been prepared.

7.12 Section 3 advises about the Vision and Objectives of the Plan. The Vision is as follows:

'Our vision is for Stanstead Abbotts, St Margarets and The Folly to thrive as a diverse and inclusive rural village that supports varied livelihoods and promotes community cohesion and well-being. We will provide and promote locally accessible and sustainable development that provides affordable housing whilst protecting the

heritage of our area. Sustainable means that the present needs for housing and employment are met without there being any compromise in the ability of future generations to meet their needs also. Our vision includes enhancing our green spaces for wildlife and community use, improving natural flood defences, and further establishing our place in the wider Lea Valley corridor.'

7.13 The Objectives link to the Vision Statement and provide the basis for the policies. The main topics in the Plan overlap with specific objectives. This is a major success of the Plan.

7.14 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

SASM H1 Village and Green Belt Boundary

7.15 This is an important policy in the Plan. In general terms it provides an overall spatial strategy for the neighbourhood area.

7.16 In specific terms, it amends the Green Belt to accommodate a site to provide the remainder of the allocation for the neighbourhood area. The Plan identifies that the site needed to be in a location that enabled the drawing of a new, strong, and defensible boundary between the village and the Green Belt. An explanation of how the housing numbers have been achieved in this Neighbourhood Plan is outlined in Policy SASM H2. The proposed Green Belt allocation lies off Netherfield Lane/Roydon Road is identified in Policy SASM H3.

7.17 As submitted, the policy reads as a statement of fact rather than as a land use policy. I sought SAPC's comments about its intention. It advised that the policy is intended to redefine the village settlement boundary and amend the Green Belt boundary. It suggests amending the policy to one which support development proposals within the redefined village settlement boundary.

7.18 I comment separately on the proposed housing allocation at Netherfield Lane/Roydon Road later in this report.

7.19 I recommend that the policy is recast so that it provides a spatial context for the neighbourhood area. Such an approach will focus new development in sustainable locations which will have ready access to the commercial and community uses in the main built-up part of the neighbourhood area. The Plan advises that this approach would be consistent with paragraph 10.3.2 of the District Plan which advises that Group 1 Villages are the most sustainable villages in the District, and that development for housing, employment, leisure, recreation, and community facilities will be permitted. The Plan also advises that growth in these areas will help to sustain existing shops, services and facilities, deliver affordable housing, provide local job opportunities, and deliver community benefits.

7.20 I recommend that the policy is recast so that it has a policy format and can be used to determine planning applications. Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'The Plan defines a village settlement boundary to include the Housing Site Allocation SASM H3 Netherfield Lane/Roydon Road. Development proposals within the village settlement boundary will be supported where they comply with other development plan policies'

SASM H2 Housing Numbers

7.21 This policy continues the approach taken in the previous policy. It advises that the neighbourhood area will accommodate a minimum of 98 new homes in the Plan period by:

- site allocation policy SASM H3 - Land east Netherfield Lane/south of Roydon Road for 60 homes (sites K and L);
- site allocation policy SASM H4 -the two garage sites on Abbotts Way for approximately 7 homes (sites 32 and 33);
- 25 homes which have been built and occupied since April 2017 (sites 28, 29, 30a, 30b, 36, 37 and 38); and
- Future windfall sites (approximately 6 homes).

7.22 The policy takes a matter-of-fact approach to the delivery of housing numbers. I am satisfied that it has regard to Section 5 the NPPF and is in general conformity with Policies DPS1/DPS2 of the District Plan. I comment separately about the proposed allocated site at Netherfield Lane/south of Roydon Road for 60 homes later in this report.

7.23 I have noted the comments received from Catesby Estates on the policy. Nevertheless, the policy is one which focuses on the strategic delivery of housing rather than the delivery of affordable houses. In any event the policy seeks to provide the local delivery of strategic policies in the District Plan.

7.24 The second and third parts of the policy read as supporting text rather as a land use policy. In this context I recommend that they are deleted and that the third part is repositioned into the supporting text. This approach was agreed by SAPC in its response to the clarification note. I have concluded that the second part of the policy is already satisfactorily addressed in paragraphs 4.21 and 4.22 of the Plan.

7.25 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Delete the second and third parts of the policy

At the end of paragraph 4.23 add: 'The parish councils consider that it will be extremely likely that the existing sites with planning permission will all be completed for occupation before 31st March 2033.'

SASM H3 Land East of Netherfield Lane/south of Roydon Road

7.26 This is an important policy in the Plan. It proposes the allocation of the site for mixed use development of Class C3 (Residential) and Class E (Business). I looked at the site

carefully during the visit. I paid particular attention to its location within the Green Belt and to the built-up parts of the neighbourhood area.

7.27 The whole site is within the Green Belt. The site consists of two principal parts. The first is a brownfield parcel of land with access off Netherfield Lane. Planning permission has been granted for its residential development. The second is the surrounding greenfield land to the north and to the east.

7.28 The justification for the release of the site from the Green Belt is set out in Appendix C: Housing Site Selection and Allocation Process. The supporting text advises that the green field element of the site is already contained on three sides by existing development and has not been used for agricultural purposes other than for occasional grazing several years ago.

7.29 The policy proposes the allocation of the site for mixed use development - Class C3 (Residential) and Class E (Business). It advises that:

- the site will accommodate 60 homes, providing affordable housing, including a 6-home scheme of community-led housing;
- there should be no greater land-take of greenfield land than is necessary to deliver the development; and
- any part of the greenfield area of the site that is not required for housing or related infrastructure for the development should provide high quality, accessible green infrastructure including a permanent, defensible, and landscaped boundary to contain the settlement edge and define the new Green Belt boundary.

7.30 The fourth part of the policy sets out a series of criteria for the development of the site.

7.31 The delivery of the site seeks to assist in delivering the strategic housing requirements for the neighbourhood area in the District Plan. In its response to the clarification note, EHDC advised that:

'Policy VILL1 of the adopted District Plan (2018) justifies the exceptional circumstances for amending the Green Belt boundary at Stanstead Abbotts and St Margarets to accommodate the district's housing strategy. Policy criterion Policy VILL1 III. details that where proposals in neighbourhood plans involve changes to Green Belt boundaries, the District Council will consider making these amendments either through the next Review of the District Plan or a Site Allocations Development Plan Document. However, following the adoption of the District Plan in 2018, national policy has been amended to enable Neighbourhood Plans to amend Green Belt boundaries, as demonstrated in paragraph 145 of the NPPF (December 2023). As such, East Herts Council is satisfied that the Neighbourhood Plan's proposed allocation at Netherfield Lane (H3), properly relates to the requirements in paragraph 145 of the NPPF (December 2023).'

7.32 In its capacity as the owner of the proposed housing allocation, Webster Estates Limited comment that:

'they have engaged with the Neighbourhood Plan Steering group, the Parish Councils, the Baish Almshouse Trust, local stakeholders, and residents throughout the preparation of the (Plan).

Given the presence of established built form at the south-western corner of the site, coupled with an extant grant of planning permission for the comprehensive redevelopment of that previously developed land with 20 dwellings and a business unit, it is clear that the remainder of the site performs no Green Belt function.

This is a sustainably located, partially previously developed site – where comprehensive development in accordance with the draft allocation can be delivered without material harm in terms of landscape and visual impact, highways safety, or residential amenity.'

7.33 The proposed development of the site has attracted a range of comments and objections from residents and organisations.

7.34 The Lea Valley Regional Park Authority (LVRPA) comments that:

the site allocation…proposes a substantial residential development within the Regional Park which will also require removing the site from the Green Belt and the inclusion of an undeveloped green field area. The Authority is cognisant of the fact that this site is the main allocation for the Neighbourhood Plan and one that is sufficiently large enough to ensure delivery of a range of housing provision including a 40% allocation of affordable housing to provide for local needs.

However, the inclusion of the green undeveloped land to the north and east of the original developed or brownfield site will result in a significant change to the parks landscape, with development allowed to intrude further into the largely rural valley sides at an informal but important entry point into the Regional Park. This would be contrary to the Authority's PDF Proposals and would not conform to policy in East Herts District Plan which is supportive of the Lee Valley Regional Park and the Park Development Framework (PDF), under Policy CFLR51.

Policy SASM H3 would result in built development intruding further into the largely rural valley sides which form an important part of the Regional Park's landscape and feature in views out towards northeast. The woodland and vegetated boundaries along field edges has direct connectivity with the woodland and scrub habitat edge to Stanstead Innings and therefore has value in terms of the wider ecology of the area. Development even if screened and well- designed will impact upon the wider Park area by reducing the connectivity of habitats, introducing light pollution and increasing vehicular movements along a route that is well used by pedestrians/cyclists and is a designated a bridleway. The Authority therefore objects to the inclusion of the undeveloped portion of the site allocation.

7.35 Catesby Estates proposes the development of land to the west of Stanstead St Margarets and St Margaretsbury Recreation Ground (known as site No. C2 as part of the Plan preparation process). As part of its representation, it comments that:

'In order to establish alternatives, the SEA considered 4 options. Option 3 included site C2, identifying it as a potential 100 dwellings allocation. It was acknowledged that a hybrid option or multiple combinations of further options could be formed and assessed under the SEA, but it was considered that this would be disproportionate for the purposes of strategic assessment at this stage.

Whilst it is acknowledged that greater clarity should be sought when undertaking a SEA to inform subsequent plan-making decisions, it is notable that the SEA was undertaken in June 2024. There has been no subsequent up-date of the SEA since the new NPPF has been published in December 2024 (and updated in 2025), along with the fact that currently the District Council cannot demonstrate a 5-year housing supply.

At the very least, prior to the examination the SEA should be updated to assess the implications of these factors, and to potentially consider further hybrid options, which takes into account a greater number of dwellings to meet the identified need. This hybrid option could potentially include housing delivery at both Sites K, L (ie. proposed allocation site H3) and Site C2.

On page iv of the Non-Technical Summary of the SEA, there is a Summary findings table that sets out the impact of each option against the identified themes. It is noted that with regards to the ranking of Option 3 (which includes Site C2} under the Landscape theme, it is ranked number 3, whereas Option 4 including Site C3, is ranked number 2. However, Site C3 is located to the east of the village, and would result in at least the same impact on the landscape. It is therefore unclear how Option 3 is ranked lower in the Landscape theme than Option 4, and should at least be ranked the same as Option 4

It is also noted that Option 2, Option 3 and Option 4 are ranked the same under the Transportation and movement theme. Again, this is unclear as to why this is the case, taking into account Site C2 in Option 3 is within 450m of the village centre and St Margarets train station. Whereas for Option 2, Sites Kand L and Option 4 are located around 1.2km from the train station. This therefore highlights that Site C2 is located within a much more preferred sustainable location, and, under the Transportation and movement theme Option 3 should be ranked higher that Options 2 and 4.

With these two changes to the ranking of the Options set out in SEA, this would result in Option 2 scoring a total of 11, Option 3 scoring a total of 10, and Option 4 scoring a total of 13. Under the ranking score of the SEA, it is therefore contended that Option 3 that includes Site C2, should be the preferred option out of the four options that were assessed. This therefore brings into question the validity of the SEA.'

7.36 In its capacity as the Lead Local Flood Authority Hertfordshire County Council advises that:

'Netherfield Lane and Roydon Road are modelled to be at high risk of surface water flooding, including several nearby properties. We have a record of property flooding on Netherfield Lane, and there is an area pending a formal Section 19 flood investigation to the north on Marsh Lane/Thele Avenue, where multiple properties have flooded. As

such it is important that surface water generated on this site is managed appropriately to ensure there is no increase in flood risk off-site.

It is acknowledged the site is part brownfield and part greenfield. Considering local flood risk, betterment should be achieved by restricting the whole site to greenfield runoff rates and volumes. Furthermore, no below-ground features such as attenuation tanks should be proposed. Above-ground SuDS should be used to achieve the four pillars of SuDS, including biodiversity net gain as required by SASM H3 Paragraph IV part F.'

7.37 Within this broader context paragraphs 7.38 to 7.44 provide general commentary on the site selection process. Thereafter paragraphs 7.45 to 7.50 comment about the proposed site.

General commentary on the site selection process

7.38 The way in which SPC has sought to deliver strategic housing growth has generated significant comment from Catesby Estates. In a broader context a neighbourhood plan is assessed against strategic policies in the development plan (here the District Plan). Plainly the District Plan is dated and Planning practice guidance provides advice about the way in which emerging neighbourhood plans and local plans should seek to address issues in a consistent and complementary way. However, in this case, the emerging District Plan Review is in its early stages and the Local Development Scheme advises that it will be submitted for examination in November 2027 and will be adopted in June 2028. In these circumstances there are no details on its potential direction.

7.39 Nevertheless, given that the emerging District Plan Review will be adopted within the Plan period I recommend the inclusion of commentary in Section 12 (Implementation) about the potential need to accommodate further growth in the neighbourhood area.

7.40 In general terms, I am satisfied that SPC has approached the selection of housing sites in a comprehensive way. The Site Selection Process (Appendix C) summarises the approach taken and overlaps with work undertaken by EHDC on characteristics of the Green Belt in the District.

7.41 Furthermore the resulting Environmental Report (ER) is very thorough. It assesses an extensive range of potential sites and distils the various sites into a series of reasonable alternatives/options (Table 5.2).

7.42 I am satisfied that Appendix C and the ER take an appropriate approach towards the significance of the Green Belt in the neighbourhood area and that sites within the Green Belt are appropriately identified. I note that each of the four options involves an element of proposed brownfield and greenfield development.

7.43 I have already noted in paragraph 6.16 of this report that SPC acknowledged that Options 2,3 and 4 scored in a similar way along with the justification for its selection of Option 2 (which incorporates the housing sites captured in Policies H3 and H4 of the Plan). I have also noted the comments from Catesby Estates about the extent to which

slightly different assessments of the detailed elements of the SEA may have resulted in a different overall ranking and site selection.

7.44 I have considered these matters carefully. On the balance of the evidence, I am satisfied that SPC has come to a reasonable and balanced conclusion on this issue. I have reached this conclusion for three related reasons. The first is that strategic environmental assessment requires a degree of judgement both on the technical components of the work undertaken and the overall conclusion. Plainly this is the case in the neighbourhood area given the number of sites assessed and the irregularly shaped nature of the built-up area. The second is that the development of Green Belt land is a consistent issue across each of the four options. This is consistent with the approach anticipated for the neighbourhood area in the District Plan. The third is that approval of the planning application on the brownfield part of the site proposed in Policy H3 provides a revised context for the location of residential development in the neighbourhood area. In this context I am satisfied that it is entirely reasonable that SPC has pursued the potential development of the surrounding greenfield land. This overlaps with EHDC's response to the clarification note about the way in which the submitted Plan is seeking to deliver the strategic requirement for the neighbourhood area.

Commentary on the details of the proposed site allocation

7.45 The visit to the site highlighted the following related matters:

- its location to the immediate south east of Stanstead Abbotts;
- its relationship to existing built development to the north-west (Netherfield Lane) and to the north (Roydon Road);
- the very clear distinction between the greenfield and brownfield elements of the site;
- the relatively self-contained nature of the site given its relationship with Netherfield Lane and Roydon Road, and the surrounding vegetation and hedgerows; and
- its relationship to the Baesh almhouses (to the immediate north of the proposed site).

7.46 In the context of the commentary in the District Plan about the potential need to release green belt land for residential development in the neighbourhood area (and the related commentary in paragraph 145 of the NPPF), I am satisfied that the allocation of the site for residential development is appropriate and has regard to national policy. I am also satisfied that the allocation of the site will result in revised Green Belt boundaries that will not need to be altered at the end of the plan period (in accordance with NPPF paragraph 148e) and which will define the revised Green Belt boundaries clearly, using physical features that are readily recognisable and likely to be permanent (in accordance with NPPF paragraph 148f).

7.47 I have noted the comments made on the policy by the LVRPA and SAPC's response to the clarification note. I have considered the matter very carefully. Plainly the development of the site will have an impact on the neighbourhood area and its relationship with the wider Lea Valley. However, on the balance of the evidence I am

satisfied that the Plan has taken an appropriate approach towards these matters. I have reached this conclusion for three related reasons. The first is that the proposed development of the site is an important element of the delivery of the strategic housing requirement for the neighbourhood area as identified in the adopted District Plan. The second is that the proposed site has clearly defined boundaries and is visually separated by Netherfield Lane from the River Lea Navigation, the Mill Stream, and Abbotts Lake. The third is that the other three options for delivering growth considered in the Environmental Report would have similar effects on the Regional Park.

7.48 I saw the information board which the owner had erected on the site during the visit and looked at the information on the associated website. On the one hand, I note that background work has taken place on the development of the site. This overlaps with the representations made by the owner during the most recent consultation exercise. However, on the other hand I do not give any weight to indicative site layout and the mix of houses. These are matters which will be determined by EHDC in due course giving appropriate weight to all relevant development plan policies, including Policy SASM H3 of the submitted Plan.

7.49 In general terms, the policy captures the various issues and constraints of the development of the site. Section 4 of the policy includes a package of development criteria which overlap with the approach taken in Design Guidelines. In this positive context, I recommend the following modifications to the policy to bring the clarity required by the NPPF, to ensure that the site is developed in an appropriate way, and to allow EHDC to be able to implement it through the development management process:

- the inclusion of a reference in the second part of the policy to the need for the development of the site to accord with an overall masterplan rather than piecemeal development coming forward on the brownfield and greenfield elements and to provide clarity on the type and mix of housing to be delivered to ensure consistency with the details in paragraph 4.27 of the Plan;
- a recasting of the third part of the policy to ensure that built development should occupy the minimum amount of the greenfield land that is required to deliver 60 homes on the overall site consistent with good design and layout;
- a recasting of the opening element of the fourth part of the policy so that its requirements are clearer;
- a recasting of criterion b) so that it is consistent with the revised second part of the policy;
- a recasting of criterion d) so that it comments about specific parking requirements rather than restating existing local standards;
- a recasting of criterion f) so that it comments about a land use matter (the delivery of satisfactory access points) rather than a process (carrying out a Transport Impact Assessment);
- a recasting of criterion g) to include reference to the importance of lighting as highlighted in the supporting text; and
- a recasting of criteria h) and i) to ensure that the policy gives special regard to safeguarding the Baesh almhouses and their setting in accordance with national policy.

7.50 I also recommend consequential modifications to the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the second part of the policy with: 'The site should deliver a coordinated approach to the delivery of its brownfield and greenfield components supported by a masterplan, and accommodate approximately 60 homes, including affordable housing, and a 6-home scheme of community-led housing.'

Replace the third part of the policy with: 'Built development should occupy the minimum amount of the greenfield land that is required to deliver 60 homes on the overall site consistent with good design and layout. The remaining parts of the greenfield area of the site should provide high quality, accessible green infrastructure including a permanent, defensible, and landscaped boundary to contain the settlement edge and define the new Green Belt boundary.'

Relace the opening element of the fourth part of the policy with: 'In addition to the design guidelines in Stanstead Abbotts Neighbourhood Masterplanning and Design Guidelines (AECOM 2021), development proposals should respond positively to the following site-specific criteria:'

Replace criterion b) with: '40% affordable housing should be delivered on the site and a 6-unit housing scheme to be made available to the Baesh Trust.'

Replace criterion d) with: 'Parking provision should be integral or on-plot, and be sympathetically designed to minimize impact on the street scape. Parking for any flats delivered on the site should be provided in a landscaped courtyard.'

Replace criterion f) with: 'The delivery of a vehicular access to Netherfield Lane and pedestrian and cycle accesses to Netherfield Lane and/or Roydon Road.'

Replace criterion g) with: 'The development of the site should showcase sustainable design and use an innovative layout to maximise daylight, attractive outlooks, sensitive lighting and ensure appropriate privacy and amenity for occupants.'

Replace criterion h) with: 'The design and layout of the site should respond positively to the listed Baesh almhouses to the immediate north of the site and provide sufficient distance between new buildings and the almhouses to safeguard their setting.'

Replace criterion i) with: 'Within the context of criterion h) a vehicular access should be provided to the rear of the almhouses for general access and for emergency vehicles.'

At the end of paragraph 4.25 add:

'It is essential that the overall site should be developed in a consistent and structured way. The second part of the policy advises that the allocated site should deliver a coordinated approach to the delivery of its brownfield and greenfield components, and

accommodate approximately 60 homes, including affordable housing, and a 6-home scheme of community-led housing.'

In paragraph 4.26 delete 'easily'

Replace paragraph 4.29 with:

'The overall pattern of development should respond positively to the site's immediate surroundings. The second part of the policy and some of the criteria in the fourth part provide guidance on house types and sizes. Given the nature of the existing junction of Netherfield Lane with Roydon Road new access points into the site will be required. This is addressed in criterion f) in the fourth part of the policy. The scale and nature of the access points should be informed by a Transport Impact Assessment. A lighting plan should be prepared to ensure dark corridors can be maintained along the site boundaries, both during construction and once occupied.'

SASM H4: Site H6 Chapelfields and Abbotts Way Garages

7.51 The policy proposes the allocation of land for residential development in accordance with the site selection process. The land concerned is a small brownfield site within the village settlement area and is currently owned by Network Homes. It consists of two sites adjacent to one another, which currently are occupied by garage blocks. The policy allocates the sites for the development of seven homes. As with Policy H3, it includes a series of criteria.

7.52 I looked at the sites carefully during the visit. I saw their relationship with the surrounding houses and the sloping nature of both sites. In its response to the clarification note, SAPC advised that the proposed yield of the policy relates to the combination of both the two sites, and that the criteria also apply to both sites.

7.53 On the balance of the evidence, I am satisfied that the development of the two sites will represent sustainable development and make effective use of brownfield land. I am also satisfied that with careful treatment and design the levels and access challenges to the development of the two parts of the site can be overcome. Within this broader context I recommend that the second and third parts of the policy are recast so that they relate better to the development management process and have the clarity required by the NPPF. I also recommend that the opening element of the fourth part of the policy is simplified. Finally, I recommend that the wording of the first two criteria is modified so that they can be more readily applied by EHDC as it determines planning applications on the site.

7.54 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the second and third parts of the policy with:

'The design and layout of the development should relate sympathetically to the topography.

Development proposals for the two sites should incorporate soft and hard landscaping, including creating usable connected green spaces.'

Replace the opening element of the fourth part of the policy with:

'Development proposals should meet the following site-specific criteria based on the site constraints and additional design guidelines set out in Stanstead Abbotts Neighbourhood Masterplanning and Design Guidelines (AECOM 2021):'

Replace a) with: 'The incorporation of a mix of semi-detached or terraced homes and flats.'

Replace b) with: 'New buildings should be a maximum of two and a half storeys to reflect the height of neighbouring residential buildings and be designed with reference to views across the valley from the sites.'

SASM H5: Brownfield Land and Windfall sites

7.55 Within the wider context of the other housing policies and allocations the Plan acknowledges that windfall and brownfield sites will come forward in the Plan period. This policy advises that where possible all new build housing should be delivered on the sites identified in this Plan or on previously developed brownfield sites within the village development boundary. It also comments that any proposals for appropriate infilling within the village development boundary that are designed in accordance with design policies of this Plan will also be supported.

7.56 In general terms the policy takes a positive approach to w development and has regard to Section 5 of the NPPF. I recommend two modifications to bring the clarity required by the NPPF and to allow EHDC to be able to apply the policy through the development management process:

- recasting the first part of the policy so that it comments about the focus of new housing in the Plan period and the potential part to be played by windfall development; and
- simplifying the opening element of the second part of the policy so that it has a general rather than a geographic effect.

7.57 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the first part of the policy with:

'New housing development will be focused on those sites identified in this Plan or on previously developed brownfield sites within the village development boundary. Any other proposals for appropriate infilling within the village development boundary that respond positively the design policies in the development plan (including Policy D1 of this Plan) will also be supported.'

Replace the opening element of the second part of the policy with: 'Suitable windfall sites may include:'

SASM H6: Type and Mix of Housing

7.58 This policy seeks to promote the development of smaller homes. It is underpinned by EHDC's Housing Strategy.

7.59 The policy advises that proposals should demonstrate how the mix of dwellings and tenures meet local needs and are appropriate to the location. It also comments that new housing should be safe, accessible, environmentally sustainable, and spacious enough to accommodate the changing needs of occupants throughout their lifetimes. The second part of the policy comments that the provision of one and two-bedroom flats will be welcomed, particularly in locations close to public transport routes.

7.60 The policy takes a positive approach to the type and mix of housing and has regard to Sections 5 and 8 of the NPPF.

7.61 I recommend that the wording in the second part of the policy is modified so that EHDC can apply the policy through the development management process. This acknowledges that 'encouraged' has little weight in a planning policy document. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the second part of the policy with: 'The provision of one and two-bedroom flats will be supported, particularly in locations close to public transport routes.'

SASM D1 Design of Development

7.62 This is an Important policy. As the supporting text comments the importance of good design in the built environment is widely established. The policy is underpinned by the submitted Masterplan and Design Guidelines and incorporates a series of criteria with which development proposals should comply.

7.63 In the round the policy has been well-considered and provides a first-class local iteration of Section 12 of the NPPF. In this broad context I recommend two modifications to the policy. The first ensures that it is worded so it can be applied proportionately by EHDC through the development management process. The second is so that that the policy comments about the design requirements for development rather than offering support. This acknowledges that EHDC will be applying other development plan policies to the determination of planning applications.

7.64 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the opening element of the policy with:

'Development proposals should be of a high standard of design and layout. As appropriate to their scale, nature and location development proposals should incorporate the following criteria:'

SASM D2 Housing Density

7.65 The supporting text advises that appropriate densities should be arrived at through a design-led approach, taking account of the site context and infrastructure capacity. It also comments that developments should make efficient use of land, considering a range of contextual factors.

7.66 The policy comments that the density of new residential development should be appropriate for the best use of the land and optimised in locations with good transport and community facilities, subject to quality design and communal public green space provision. It also comments that density will need to be appropriate for the context and character of the immediate area.

7.67 In general terms the policy has regards to Sections 11 and 12 of the NPPF. Nevertheless, I recommend that the policy is recast so that it more closely relates to the development management process. Its purpose and effect remain unchanged.

7.68 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

'The density of new residential development should secure the best use of the land and be optimised in locations with good transport and community facilities, subject to achieving quality design (in accordance with Policy SASM D1) and the provision of communal public green space. Furthermore, the density of new residential development should respond positively to the context and character of the immediate area.'

SASM D3 Amenity

7.69 This is a comprehensive policy on residential amenity. It comments that the design and layout of building should enable good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development. Dual aspect is preferred for all new homes. The policy also advises that single aspect dwellings should be avoided wherever possible particularly where they are north facing, exposed to noise or contain three or more bedrooms. Finally, the policy advises that homes must provide for direct sunlight to enter at least one habitable room for part of the day.

7.70 The policy takes a positive approach to these matters. I recommend modifications to the wording used so that it can be applied by EHDC through the development management process and acknowledge that the ambitions of the policy may not always be deliverable. Nevertheless, its intentions remain unchanged. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the second and third sentences with: 'Wherever practicable, all new homes should have a dual aspect, and single aspect dwellings should be

avoided particularly where they would be north-facing, exposed to noise or contain three or more bedrooms.'

Replace the fourth sentence with: 'All homes should be designed and arranged to allow direct sunlight to enter at least one habitable room for part of the day.'

SASM D4 Residential Amenity Space

7.71 The supporting text advises that the design of outdoor space is important, and the arrangement and quality of the spaces can have a significant impact on residents and neighbours

7.72 The policy comments that all new dwellings should be provided with private open space such as a garden, balcony, terrace, or wintergarden. It also advises that where communal space is provided, proposals should demonstrate the space is overlooked, accessible, designed for sunlight and will be maintained.

7.73 I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

SASM R1 Riverside Development

7.74 The supporting text advises that life in Stanstead Abbotts and St Margarets is very much focused around water and most residents live within sight of either the New River, the River Lea Navigation, Mill Stream, or the original River Lea itself. It also comments that the houses flanking the Lee Valley Park are close to one or other of the many lakes created from former gravel pits which makes them attractive but being low-lying they are vulnerable to flooding.

7.75 The resulting policy is comprehensive. It advises that development alongside and adjacent to the river will be expected to contribute to improvements and enhancements of the river environment and should ensure that homes establish a relationship with the river. The policy includes a series of criteria.

7.76 In general terms, the policy takes a positive approach to these matters and has regards to Sections 14 and 15 of the NPPF. In its response to the clarification note SAPC proposed revisions to the policy to reflect the comments from the LVRPA and the Canal and River Trust. Based on this approach, I recommend additional modifications to bring the clarity required by the NPPF. One of the modifications incorporates a proportionate element into the third part of the policy to acknowledge that not all development proposals will be able to achieve the ambitions of the policy.

7.77 Otherwise I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

'Development proposals alongside and adjacent to the river should contribute to improvements and enhancements of the river environment and should ensure that homes establish a sensitive relationship with the river.

Development proposals should maximise the benefits of the river setting in terms of views and vistas while generating natural surveillance of the water space, create public spaces as focal points, and incorporate uses that enable the local community and public to enjoy the riverside, especially at ground level in buildings fronting the river and along the waterway's towing paths.

As appropriate to their scale and nature, development proposals alongside or adjacent to the river should:

a. Enhance existing public access to the riverside where improvements are feasible; or

b. Provide new public access to the riverside where possible and maintain existing points of access to the foreshore. All major development proposals adjacent to the river shall provide public access; and

c. Provide suitable parking, refuse and recycling facilities and utilities infrastructure where additional moorings are proposed; and

d. Respond positively to the integrity of the waterway structure, navigational safety, safety of all waterway users, ecology, and the biodiversity of the waterway.'

SASM R2 Floating Structures

7.78 This policy continues the approach in Policy SASM R1. In this case its focus is on floating structures. Paragraphs 6.5 and 6.6 set out the context for the policy.

7.79 On the one hand, the policy takes a positive approach to such development. However, on the other hand, the criteria are presented in a negative rather than a positive way. I recommend modifications to address this matter and which results in a policy which sets out requirements for any such development proposals.

7.80 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

'Proposals for moorings and floating structures should:

a) respond positively to the character or integrity of the river;

b) respect recreation and commercial use of the river; and

c) provide a parking space, refuse and recycling facilities, and utilities infrastructure for any permanent mooring.'

SASM HA1: Heritage Assets

7.81 The context to the policy is the Stanstead Abbotts Conservation Area. It is irregularly shaped and covers most of the High Street and Station Road plus Roydon Road, Cats

Hill, Hunsdon Road and Hoddesdon Road. The Conservation Area Appraisal identifies 58 listed buildings.

7.82 The first part of the policy advises that development proposals should pay special attention to the desirability of conserving the significance of designated heritage assets within the Stanstead Abbotts Conservation Area in accordance with the Stanstead Abbotts Conservation Area Appraisal and Management Plan July 2014 and its successors.

7.83 The second and third parts of the policy comment more generally about heritage assets.

7.84 I am satisfied that the first part of the policy is locally-distinctive and adds value to national and local planning policy. However, I am not satisfied that this is the case with the second and third parts of the policy. As such I recommend their deletion. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Delete the second and third parts of the policy

SASM HA2: Non designated Heritage Assets

7.85 Identifies eight Non-designated Heritage Assets. Details of the Assets are set out in Appendix D.

7.86 In general terms the policy takes a positive approach and has regard to Section 16 of the NPPF in general terms, and paragraph 209 which advises about Non-designated Heritage Assets.

7.87 I note that the Hertfordshire Gardens Trust support the policy.

7.88 I recommend two modifications to bring the clarity required by the NPPF:

- the recasting of the first part of the policy so that it explicitly identifies the non-designated heritage assets; and
- the removal of the reference in the second part of the policy to any future potential non-designated heritage assets. Plainly such an approach is open-ended and is not underpinned by the details in Appendix D.

7.89 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the opening element of the first part of the policy with: 'The Plan identifies the following Non-designated Heritage Assets.'

Replace the second part of the policy with: 'Development proposals which affect the identified non-designated heritage assets should take into account the significance of the heritage asset to enable a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset.'

SASM HA3: Archaeology

7.90 This is a comprehensive policy on archaeology. It acknowledges that much of the Conservation Area is also defined as an Area of Archaeological Significance.

7.91 On the one hand, the policy provides positive guidance on this important element of the neighbourhood area and has regard to Section 16 of the NPPF. However, on the other hand, it largely restates national and local planning policies on archaeology.

7.92 In this context I recommend the deletion of the first and third parts of the policy. In the case of the third part, I recommend that it is repositioned into the supporting text.

7.93 I recommend that the wording used in the second part of the policy is modified so that it has a more natural relationship with the development management process. I also recommend that it refers to any mitigations which may arise from the investigatory works. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Delete the first part of the policy.

In the second part of the policy replace 'no development will be supported' with 'development proposals will not be supported' and add at the end 'and the incorporation of any appropriate mitigation measures.'

Delete the third part of the policy.

At the end of paragraph 7.15 add:

'Any development proposals at the interface between the flood zone and higher ground may provide the opportunity to help with identification of the boundary of an early medieval settlement. Development proposals on the High Street may reveal information about the earliest occupation of the area. The parish council will press the District Council to add an informative note to any planning consent to work with Hertfordshire County Council and Historic England to monitor the development process and allow retrieval or recording of information.'

SASM HA4: Protected Views

7.94 The policy is based on twelve Protected Views which were identified either from the Stanstead Abbotts Conservation Area and Management Plan or identified after the report was produced. Their details are described in Appendix E. The views protected are a mix of urban (within the villages) and rural. In some cases, the views also contribute to and help to preserve the setting of heritage assets

7.95 The policy advises that consideration of the protected view should be taken into account as part of any proposal's submission documents or, if proportionately required, an appropriate Landscape Visual Assessment. I looked at a selection of the proposed views during the visit. I saw the way in which they captured elements of the character of the neighbourhood area.

7.96 I recommend that the second part of the policy is recast so that it is more explicit about its requirements for development proposals. This will allow EHDC to apply the policy through the development management process. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the second part of the policy with:

'The scale, orientation and massing of development proposals should respond positively to the protected views. Where necessary, development proposals should be supported by a Landscape Visual Assessment.'

SASM NE1 Local Green Space

7.97 The Plan proposes the designation of seventeen local green spaces (LGSs). The approach taken is underpinned by the Local Green Space Assessment (Appendix G). The supporting text also provides a summary for each proposed LGS. I looked at the proposed LGSs during the visit. I saw the concentration of such spaces along the banks of the River Lea.

7.98 Appendix G provides a comprehensive assessment of the various LGSs. I note that it concludes that proposed LGS 11 (Land east of Kitten Lane and north of Roydon Road) is an extensive tract of land and not local in character. As such I recommend its deletion from the Plan as it does not comply with the three criteria in paragraph 106 of the NPPF.

7.99 I am satisfied that the other proposed LGSs meet the requirements of paragraph 105 and 106 of the NPPF.

7.100 The policy component goes well beyond the matter-of-fact approach taken in paragraph 107 of the NPPF. I recommend that the policy is modified accordingly. EHDC will be able to come to its own judgement on the extent to which any such development proposals would accord with the national approach for the protection of LGSs.

7.101 Whilst the proposed LGSs were readily identifiable as part of the visit, the maps of the Local Green Spaces in the Plan are unclear. I recommend that they are improved to provide the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Delete LGS11 (Land east of Kitten Lane and north of Roydon Road)

Replace the final part of the policy with: 'Development proposals within the designated local green spaces will only be supported where in very special circumstances.'

Improve the clarity of each of the LGS maps and produce a single showing their full range and location

SASM NE2 Nature Conservation

7.102 This is a wide-ranging policy on nature conservation. It addresses biodiversity net gain in general, and the specific importance of the watercourses. The policy is underpinned by extensive supporting text.

7.103 In general terms the policy takes a positive approach to these matters and has regard to Section 15 of the NPPF. However, the first part of the policy restates national policy on biodiversity net gain and the second part of the policy repeats the guidance in Policy NE1 of the District Plan. In these circumstances I recommend that they are deleted. I also recommend a consequential modification to the supporting text. I also recommend that the fourth part of the policy is deleted and repositioned to the end of paragraph 8.45 of the Plan. This highlights that it addresses a process matter (how biodiversity net gain may be delivered) rather than being a land use policy.

7.104 I recommend that the third part of the policy is recast so that it has a proportionate element. This acknowledges that development proposals will have different abilities to implement the direction of the policy. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Delete the first and second parts of the policy.

Replace the third part of the policy with: 'As appropriate to their scale, nature and location development proposals within or adjacent to watercourses should seek to improve water quality based on the recommendations of the Thames River Basin Management Plan.'

Delete the fourth part of the policy.

Replace paragraph 8.44 with: 'Biodiversity should be at least increased on any development site. The current Biodiversity Metric, which measures biodiversity, is now embedded in national legislation. The Biodiversity Metric is subject to change, particularly in the light of the Environment Act 2021. The Act requires a net gain in biodiversity of 10% for relevant developments. Sensitive, informed, and integrated approaches to any development will help to conserve, enhance, and restore locally-valued landscapes.'

At the end of paragraph 8.45 add the deleted fourth part of the policy.

SASM NE3 Valued Hedgerows and Trees

7.105 This is a comprehensive policy on hedgerows and trees. It identifies four valued hedgerows.

7.106 In general terms the policy takes a positive approach to these matters and has regard to Section 15 of the NPPF.

7.107 I recommend that the policy is recast so that it relates to development management process. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

'The following valued hedgerows mark important boundaries, and provide both wildlife habitat and carbon capture along busy roads and are shown on the Policies Map. Development proposals should retain and incorporate these valued wherever practicable:

- **Hedge 1: Continuous hedgerow on the southern side of the B181 Station Road from Amwell Roundabout to the village boundary at St. Margaretsbury;**
- **Hedge 2: Hedgerow delineating the village boundary from the Green Belt which runs from the B181 Station Road southwards to the A414 along the western boundary of St. Margaretsbury;**
- **Hedge 3: On the north side of Roydon Road; and**
- **Hedge 4: Around St Andrew's School Field.**

Where development proposals enhance or plant new hedgerows, the species used should be native and climate-resilient.

Notable trees are identified in the Tree Report. The proposed removal of unprotected trees, as part of development proposals, should be accompanied by a tree survey report. Trees that have a high biodiversity value should be retained as part of a development proposal. Where this is impracticable, the trees concerned should be replaced with native, climate resilient species, in suitable locations.'

SASM NE4 Environmental Impact of Flooding

7.108 This is a comprehensive policy on the environmental impact of flooding. In general terms it takes a positive approach to this matter and has regard to Section 14 of the NPPF.

7.109 I recommend that the first part is deleted as it is a statement of intent rather than a matter that can be applied through the development management process. I also recommend that the second part of the policy is modified so that it more closely applies to the development management process. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with: 'Development proposals adjacent to water courses, should include an 8-metre undeveloped buffer from the tops of the banks to maximise the ecological benefits of waterways and ensure access for flood defence maintenance.'

SASM CL1 Existing Community Facilities

7.110 The policy seeks to safeguard existing community facilities and to support new and extended facilities. I noted the importance of the various community facilities during the visit. The policy advises that the extension or relocation of local community facilities will be supported, subject to the services provided being maintained or improved. The policy also advises that when there is no longer an identified community need for

existing community use or when it is relocated, primary consideration should be given to using and adapting the vacated premises for other community uses. Finally, the policy advises that extensions and relocated facilities should be of a high-quality inclusive design providing access for all.

7.111 The policy takes a positive approach to community facilities and has regard to Section 8 of the NPPF. It includes appropriate environmental safeguards. I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

SASM CL2 New Leisure Facilities

7.112 This policy supports the development of new leisure facilities. As with Policy CL1, it takes a positive approach to community and leisure facilities and has regard to Section 8 of the NPPF.

7.113 I recommend that the wording used in the first part of the policy is modified so that relates to the development management process and acknowledges that 'encouraged' has little if any weight in a planning policy context. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace 'encouraged provided' with 'supported where'

SASM CL3 New Facilities

7.114 The supporting text identifies a series of facilities which are unavailable in the neighbourhood area and the policy offers support for their development.

7.115 As with the two previous policies this policy takes a positive approach to community facilities and has regard to Section 8 of the NPPF. I recommend that the opening element of the policy is recast so that it is entirely policy based and refers to the wider development plan. I also recommend that the wording of the other elements of the policy is refined so that it follows on naturally from the revised opening element. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the opening element of the policy with: 'The provision of the following facilities will be supported where they are in keeping with other development plan policies:'

In a) to c) delete 'Provision of'

SASM B1 Local Employment Areas

7.116 The policy identifies Local employment areas which the Plan intends should continue to play a vital role in sustaining a thriving and sustainable village economy reducing the need to travel and promoting local spend. The Plan advises that they play a key role in providing accessible and affordable employment and business opportunities for residents, including Class E, B2 light industrial, B8 storage and distribution, and a range of small business start-up/incubation units for micro and small enterprises.

7.117 The policy also comments about the Netherfield Lane site and other proposals for employment uses.

7.118 I looked carefully at the Local employment areas during the visit. Their importance to the well-being of the neighbourhood area was self-evident. In addition, the second part of the policy takes a pragmatic approach towards non-business uses in such locations. In this broader context I recommend that the wording of the second part of the policy is modified so that it reflects the role of a neighbourhood plan within the wider development plan. Otherwise, it has regard to Section 6 of the NPPF.

7.119 I recommend the deletion of the third and fourth parts of the policy. The third part is adequately addressed in Policy SASM H3. The fourth part offers no practical guidance to developers and there are no other policies in the submitted Plan which do so. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the economic and the social dimensions of sustainable development.

Replace the opening element of the second part of the policy with:

'In designated Employment Areas proposals for non-business uses will not be supported unless:'

Delete the third and fourth parts of the policy

SASM B2 The High Street

7.120 The supporting text comments that Stanstead Abbotts High Street should continue to contain a local parade which includes a mix of shops, services and cafes which support the day-to-day needs of the local community, alongside opportunities for social interaction. It advises that the community values and will support the current mix of pubs, restaurants and a community social club which provide a thriving evening economy within easy walking distance for residents and with good public transport and car parking facilities to draw in visitors from the wider locality.

7.121 I saw the vibrancy of the High Street during the visit. The policy provides an appropriate degree of flexibility for the Plan period.

7.122 This is a positive policy which has regard to Sections 6, 7 and 8 of the NPPF. The High Street helps to define the neighbourhood area and is a key part of its attractiveness and well-being. I recommend that the second part of the policy is modified so that it relates more closely to the development management process. I also recommend that the third part of the policy is deleted as it repeats existing policies.

7.123 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the second part of the policy with: 'Development proposals should maintain active ground floor frontages within the designated commercial properties in the village core (as shown on the Policies Map) wherever practicable.'

Delete the third part of the policy

SASM B3 Flexible Working

7.124 The supporting text advises that the community positively encourages flexible working practices, and the provision of flexible workspace as part of mixed-use development. It advises that cafes and other community hubs will be encouraged to provide alternative areas for 'hot desking' and co-working opportunities.

7.125 The policy advises that the provision of flexible working space should be included as part of a mixed-use development for employment/community use.

7.126 The policy takes a positive approach to this important matter and has regard to Section 6 of the NPPF. I recommend that the policy is applied where it is practicable to do so. This will acknowledge that the size and location of new developments may not always allow the provisions of the policy to be implemented. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the economic and social dimensions of sustainable development.

Replace the policy with: 'Wherever practicable, the provision of flexible working space should be incorporated within mixed-use developments for employment/community use.'

SASM B4 Farm Diversification and Tourism Related Business

7.127 The supporting text comments that farming and agriculture form an important part of the rural heritage of the area, and includes arable and some grazed land, alongside land rented to other farmers for cattle and sheep. It also advises that as Stanstead Abbotts forms part of the Lee Valley Regional Park, the Plan strongly support development of leisure and tourism uses which boost the quality of life for residents. It comments that the parish councils are particularly aware of the rural spaces attached to various businesses such as farms, and to encourage appropriate and successful uses of that space, including farm shops, education, and leisure. In this context it advises that overnight accommodation such as hotel, guest house and/or B&Bs in suitable locations will be supported, to encourage visitors to enjoy our riverside and wildlife habitats.

7.128 The policy takes a positive approach to farm diversification and tourism-related business and has regard to Section 6 and 8 of the NPPF.

7.129 I have noted the representation made by the LVRPA. The suggested additions to the policy would widen its remit. However, they are not needed to ensure that the policy meets the basic conditions.

7.130 In the second part of the policy I recommend that the wording is modified to ensure a better relationship with the development management process. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the economic and social dimensions of sustainable development.

In the second part of the policy replace 'encouraged' with 'supported'

SASM TR1 Safe and Sustainable Transport

7.131 The policy comments that residential and community development proposals will be supported where amenities in the village can be readily and safely accessed by pedestrians and cyclists. It also comments that development proposals that respect and enhance rights of way will be supported allowing pedestrians and cyclists to have access to all amenities in the village.

7.132 The supporting text is both helpful and comprehensive. It highlights the sensitive nature of safe and sustainable transport in the neighbourhood area.

7.133 In general terms the policy takes a positive approach to these matters and has regard to Sections 8 and 9 of the NPPF. In this context I recommend the following modifications to bring the clarity required by the NPPF and to allow EHDC to apply its contents through the development management process:

- the recasting of the first part of the policy so that it sets out requirements for development proposals rather than offering support. This acknowledges that EHDC will need to consider all relevant development plan policies in the determination of planning applications;
- an acknowledgement in the first part of the policy that its ambitions may not always be practicable; and
- the simplification of the second part of the policy.

7.134 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the economic and social dimensions of sustainable development.

Replace the policy with:

'Wherever practicable, residential and community development proposals should be designed and arranged in a way in which the amenities in the village can be readily and safely accessed by pedestrians and cyclists. Development proposals should also respect and where appropriate enhance public rights of way to allow pedestrians and cyclists to have access to the amenities in the village.

Development proposals which would result in the loss of Public Rights of Way or negatively impact on the enjoyment of their use should demonstrate how the right of way will be re-provided or how the impact of the proposed development will be mitigated.'

SASM TR2 Traffic Impact of Major Development

7.135 The policy comments that major development proposals should not generate an unacceptable increase in traffic volume and movements within or through the village. It also advises that a Traffic Impact Assessment proportional to the scale of the proposed development will be required.

7.136 The intentions of the policy are very clear and appropriate. Nevertheless, the policy does not bring any added value beyond the content of national and local planning

policies. As such I recommend its deletion. SAPC agreed to this approach in its response to the clarification note.

Delete the policy

SASM TR3 Parking Standards

7.137 The policy advises that the guidelines on parking in the District Plan will be followed for each development site.

7.138 The intentions of the policy are very clear and appropriate. Nevertheless, the policy does not bring any added value beyond the content of national and local planning policies. As such I recommend its deletion. SAPC agreed to this approach in its response to the clarification note.

Delete the policy

Actions

7.139 The Plan includes a series of Actions in Appendix J. They are non-land use issues which have naturally come forward as the Plan was being prepared. The approach taken follows national policy advises that community actions should be included in a separate part of the Plan to distinguish them from the land use policies.

7.140 I am satisfied that the proposed Actions are distinctive to the parish.

Monitoring and Review

7.141 Section 12 of the Plan advises that its success in achieving the aims and objectives set out within it will be monitored along with any national or local planning policies changes that might necessitate a revision of the Plan. It also comments that such a review of the Plan will be carried out by the three parishes in accordance with current best practice.

7.142 In general terms this is a positive response to this important matter. However, I recommend that the Plan comments in further detail about the potential impact of the adoption of the New District Plan on the level of growth required in the neighbourhood area.

At the end of paragraph 12.3 add: 'The New District Plan may have an impact on the strategic level of growth required in the neighbourhood area. In this context the parish councils will assess the need or otherwise of a review of the neighbourhood plan within six months of the adoption of the New District Plan.'

Other Matters - General

7.143 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the

policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for EHDC and SAPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes (including updates to the supporting text and other elements of the Plan).

Other Matters – Specific

7.144 The recommended modifications to the policies in the Plan have sought to take account of the helpful representations to the Plan.

7.145 I recommend the following specific modifications to the supporting text to respond to the comment received from Hertfordshire County Council:

- Paragraph 11.15: Modify to acknowledge that the South East Hertfordshire Growth and Transport Plan has now been adopted; and
- Paragraph 11.16: Modify to include reference to emerging the County Council's Electric Vehicle Charging Strategy.

8 Summary and Conclusions

Summary

8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2033. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area, to designate a series of Local Green Spaces and to support residential development to meet the strategic requirement for the neighbourhood area identified in the District Plan.

8.2 Following the independent examination of the Plan, I have concluded that the Stanstead Abbotts and St Margarets Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood development plan subject to a series of recommended modifications.

Conclusion

8.3 On the basis of the findings in this report, I recommend to East Herts District Council that subject to the incorporation of the modifications set out in this report the Stanstead Abbotts and St Margarets Neighbourhood Development Plan should proceed to referendum.

Other Matters

8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved on 11 September 2018.

8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were detailed, informative, and delivered in a very timely fashion.

Andrew Ashcroft
Independent Examiner
7 October 2025