

## **SASM-1**

**From:** Ciaran MacCullagh  
**Sent:** Friday, 31 January 2025 12:52  
**To:** Laura Guy  
**Subject:** FW: Stanstead Abbots and St Margarets Neighbourhood Plan Regulation 16 Consultation

Hi again Laura,

In addition to the below, there is an issue we need to resolve with the inclusion of Warrax House as a Historic Park and Garden.

Warrax House is not included on our Draft Local List of Historic Parks and Gardens. Hill House is included, but Antonia will need to look at Warrax House to see if it warrants its own entry. Confusingly, the policy map for the draft NP does not properly include Warrax House, the NP team should look at this. The Conservation Area Appraisal does include some of the ground of Warrax House as open space to be protected.

There is reference in the NP to:

1. A detailed description of the park and its buildings entitled Hill and Warrax House Site Report Site, prepared by Hertfordshire Gardens Trust in December 2021 can be found in the evidence base on Stanstead Abbots Neighbourhood Plan website.
2. A detailed description of the park and its buildings entitled Easneye Site Record, prepared by Hertfordshire Gardens Trust in December 2021 can be found in the evidence base on Stanstead Abbots Neighbourhood Plan website.

I looked everywhere I could but could not see either of these documents – can you have a look, or could the NP team share these with us, or we can ask get Antonia to ask Hertfordshire Gardens Trust?

I think we need to ensure this issue is resolved before the NP is adopted.

Kind regards,

Ciaran



**Ciaran MacCullagh IHBC**  
Design and Conservation  
Team Leader  
East Herts District  
Council  
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**From:** Ciaran MacCullagh  
**Sent:** Friday, January 31, 2025 12:02 PM  
**To:** Laura Guy  
**Subject:** FW: Stanstead Abbots and St Margarets Neighbourhood Plan Regulation 16 Consultation

Hi Laura,

Just a few minor notes:

- There is a reference on page 3 of the PDF to the “East Herts Local Plan 2019-2033”. They might want to correct this to avoid confusion.
- In the policies map, the colour in the key for employment areas and historic parks is almost exactly the same.
- Page 42 of the PDF, para 7.8 needs to be split into two. Information on the Conservation Area can be found on the East Herts website. Information on the Listed Buildings, Scheduled Monuments, and Registered Parks and Gardens can be found on the Historic England website. And the need to changed the terminology, as Registered Parks and Gardens are not “listed”, they are either “designated” or “registered” (both are correct).

Kind regards,

Ciaran



**Ciaran MacCullagh IHBC**

Design and Conservation

Team Leader

East Herts District

Council

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**Submission Details**

Case Reference Number | EHDC685159163

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**Part A**

I am: Responding as an individual

Name Graham Knight

Address

Email

Telephone Number

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**Part B**

Do you wish to be notified of the local planning authority’s decision to ‘make’ the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? General comment

Please state the relevant policy or paragraph number that you are commenting on. Policy NE2, Action Plan environment section

Do you wish to comment, support or object? Comment

Please make you comment below and indicate any changes you are seeking. I have several comments on the environment aspects of the plan

Firstly, there are specific errors in the Appendix J Action Plan: at action E6 there is mention of a Herts and Essex Conservation Plan. This plan does not appear to exist as it cannot be found anywhere online. Further, delivery of this plan is said to be by the "Herts and Essex Wildlife Trust". This organisation also does not exist. It may refer to the Herts and Middlesex Wildlife Trust, the Essex Wildlife Trust, or both, but ought to be amended, subject to confirmation of what conservation plan the action actually refers to.

Policy NE2 ought to be amended in several ways:

Firstly, it makes no reference to the upcoming Hertfordshire Local Nature Recovery Strategy, which is due to be published in draft form very soon and then adopted at some point in 2025. The LNRS will contain a number of relevant policies and actions and it is understood that these will amount to material planning considerations when in the decision making process. Policy NE2 ought to be changed to reference the LNRS and that developments should be implemented in accordance with it

Secondly, the wording of policy NE2 could be strengthened. At part IV the phrase "could include" really ought to be amended to "should include" in order that the items mentioned are actually carried out on developments.

Further, policy NE2 ought to make specific reference to the provision of Swift bricks on new developments. The 2024 NPPF makes specific references to Swifts and planning policies at paragraph 187:

"187. Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs"

Swifts nest in Stanstead Abbots, and in particular there is a colony on the buildings at the Maltings, however they have declined by over 60% in the last 30 years, with one of the main causes of this being the loss of their nest sits in the cavities of buildings. When buildings are modernised or repaired, these nest holes are lost. Swift bricks are a permanent, maintenance free solution to this problem. Swift bricks conform to the British Standard for integrated nest boxes, BS42021, making them universal for a variety of building nesting birds. They are particularly favoured by red-listed House Sparrows, and inclusion on developments is therefore a real biodiversity enhancement.

Please consider adding to part IV of policy NE2 as follows: "Swift bricks should be installed on all new buildings in accordance with best practice guidance such as BS42021"

Given that the NPPF refers to Swifts, bats and hedgehogs, a provision relating to inclusion of "hedgehog holes" in fences should be considered for paragraph NE2 as well

**Submission Details**

Case Reference Number | EHDC685510883

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**Part A**

**I am:** Responding as an individual

**Name** Katie Fletcher

**Address**

**Email**

**Telephone Number**

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**Part B**

**Do you wish to be notified of the local planning authority’s decision to ‘make’ the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** General comment

**Please state the relevant policy or paragraph number that you are commenting on.**

**Do you wish to comment, support or object?** Support

**Please make you comment below and indicate any changes you are seeking.** The plan is very thorough and has considered the impact of future development from every perspective of village life.  
I personally would have liked more definite requirements with regard to traffic calming and public transport improvement but accept that the plan probably goes as far as powers allow in this regard.  
The Parish Council should be commended for the time and dedication to produce the plan and future proof our community. Thank you.

## Submission Details

Case Reference Number | EHDC685895873

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### Part A

**I am:** Responding as an individual

**Name** Jayne Topping

**Address**

**Email**

**Telephone Number**

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### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** No

**Do you wish to make a general comment or comment on a specific policy or paragraph?** General comment

**Please state the relevant policy or paragraph number that you are commenting on.**

**Do you wish to comment, support or object?** Comment

**Please make your comment below and indicate any changes you are seeking.** I run Ware Swifts and have read the comments made by Graham Knight of Sawbridgeworth Swifts and agree with them. I would just like to add one more thing:

On page 120 of the neighbourhood plan point E1 says the priority is low regarding the objective to reduce light pollution... I would just like to point out that it is now thought that light pollution is affecting plants and as a result is a factor accelerating the decline in insects. This is impacting the wildlife that eat insects (many birds, bats, invertebrates), therefore, I think the priority regarding this matter could be changed to high.

Here are the links where I have found this information:

<https://www.theguardian.com/environment/article/2024/aug/05/all-night-streetlights-make-leaves-inedible-to-insects-study-finds#:~:text=They found that the more,more attention to this trend.>

<https://www.bbc.com/future/article/20230308-how-light-pollution-disrupts-plants-senses>

## **Submission Details**

**Case Reference Number** | EHDC686903825

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### **Part A**

**I am:** Responding as an individual

**Name** MRS S LEAR

**Address**

**Email**

**Telephone Number**

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### **Part B**

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** General comment

**Please state the relevant policy or paragraph number that you are commenting on.**

**Do you wish to comment, support or object?** Support

**Please make your comment below and indicate any changes you are seeking.** I STRONGLY SUPPORT THE PLAN

## **Submission Details**

**Case Reference Number** | EHDC686905800

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### **Part A**

**I am:** Responding as an individual

**Name** Mr RONALD LEAR

**Address**

**Email**

**Telephone Number**

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### **Part B**

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** General comment

**Please state the relevant policy or paragraph number that you are commenting on.**

**Do you wish to comment, support or object?** Support

**Please make your comment below and indicate any changes you are seeking.** I STRONGLY SUPPORT THE PLAN



## Submission Details

Case Reference Number | EHDC686984224

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### Part A

**I am:** Responding as an individual

**Name** Robin Hunt

**Address**

**Email**

**Telephone Number**

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### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** General comment

**Please state the relevant policy or paragraph number that you are commenting on.**

**Do you wish to comment, support or object?** Support

**Please make you comment below and indicate any changes you are seeking.** This is a well-thought out plan which meets the need for affordable housing, whilst taking into account the concerns of local people, protecting the villages from excessive development and preserving the character of the communities.

## **SASM-8**

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 103 and 104. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. [https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. [https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. <http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

**Planning Technical Team**

E: [planning.central@sportengland.org](mailto:planning.central@sportengland.org)



**Get involved #ThisGirlCan**

## Submission Details

Case Reference Number | EHDC688089191

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### Part A

**I am:** Responding as an organisation

**Name** Gavin Vicary North East Hertfordshire Swift Group

**Address**

**Email**

**Telephone Number**

**Job Title / Department**

Founder

**Organisation**

North East Hertfordshire Swift Group

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### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** Specific comment

**Please state the relevant policy or paragraph number that you are commenting on.** NE2

**Do you wish to comment, support or object?** Comment

**Please make your comment below and indicate any changes you are seeking.** Could this policy please be amended to require swift bricks in all new housing in the area in the interests of biodiversity. Swifts nest in Stanstead Abbots as shown on the RSPBs Swiftmapper ([www.swiftmapper.org.uk](http://www.swiftmapper.org.uk)) and supplementing the opportunities for them would be very beneficial.

Swifts are red listed birds that have declined by more than half in the last twenty years. Swift bricks are a really valuable conservation tool that should be used in new housing to help reverse their decline.

Swift bricks last the lifetime of the building and are inconspicuous, simple and inexpensive to install and do not require ongoing maintenance. Swifts are relatively clean birds that take their mess away from the nest and their

presence is likely to go largely unnoticed by residents.

North East Herts Swift Group. A local group of Swift Conservation ([www.swift-conservation.org](http://www.swift-conservation.org))

## Submission Details

Case Reference Number | EHDC688188051

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### Part A

**I am:** Responding as an organisation

**Name** Jeff Hughes

**Address**

**Email**

**Telephone Number**

**Job Title /**

**Department** Clerk

**Organisation**

Great Amwell Parish Council

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### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** General comment

**Please state the relevant policy or paragraph number that you are commenting**

**on. Do you wish to comment, support or object?** Support

**Please make your comment below and indicate any changes you are seeking.** Great Amwell Parish Council welcomes the proposals within the Stanstead Abbots and Stanstead St Margarets Neighbourhood Plan, covering part of the parish of Great Amwell.

Great Amwell Parish Council acknowledges the difficulties experienced by the authorities concerned identifying development sites to provide the housing provision required for the area under the overarching District Plan. It fully supports the areas proposed for development, particularly as they avoid settlement coalescence and present a sustainable approach to housing development.

The Parish Council acknowledges, and is grateful for, the work of the volunteers who helped take the Neighbourhood Plan project forward to this consultation stage.

## Submission Details

Case Reference Number | EHDC691582561

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### Part A

I am: Responding as an individual

Name Teresa Meehan

Address

Email

Telephone Number

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### Part B

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? Specific comment

Please state the relevant policy or paragraph number that you are commenting on. SASM H3 Land East of Netherfield Lane/South of Roydon Road, point III

Do you wish to comment, support or object? Comment

**Please make you comment below and indicate any changes you are seeking.** There has been 3 iterations to the land east of Netherfield Lane the first was for only part of the field to be used (I have no photo evidence of this, but it was shown on the initial Parish Council Zoom call). The second iteration (photo attached) shows a natural habit area at the back of 91-93 Roydon road and to the left of the Almshouses. On the third iteration this was changed to a car park (see Websters plan for development). This car park will be directly at the back on our house, which is currently a field. We are in a grade II listed property and was advised previously by East Herts council, not to put a fence up but to use hedging along the back of our garden to fit in with the heritage of the area. So very disappointed to see this will now be a car park. We also have security concerns. I refer to point III of SASM H3 which states "There should be no greater land-take of greenfield land than is necessary to deliver the development" and would query if this is being adhered to, as the first two iterations did clearly fit the housing allocation so I'm struggling to understand why they have removed the natural habitat area.

We are in overall agreement with the NP and understand that houses need to be built, but the 3rd change to the plan has left us very concerned for personal security and feel unnecessary land is being used. We did raise this with Websters last year and they said they would look again at the plan to see if the parking spaces could be moved to the back or other side of the almshouses.



Dear Sir / Madam

Stanstead Abbots and St Margarets Neighbourhood Plan Regulation 16 Consultation.

On behalf of our client, Webster Estates Ltd (WEL), we write in support of the Stanstead Abbots and St Margarets Neighbourhood Plan (NP).

WEL are the owners of a site in Stanstead Abbots (SASM H3 - Land East of Netherfield Lane / South of Roydon Road) and they have engaged with the Neighbourhood Plan Steering group, the Parish Councils, the Baesh Almshouse Trust, local stakeholders, and residents throughout the preparation of the NP.

The NP has been carefully prepared to respond to the development needs of the Parishes, while balancing local environmental sensitivities and infrastructure requirements. To this end, it is important to reflect on the guidance provided by the National Planning Policy Framework (NPPF) relating to the preparation of plans.

Paragraph 15 of the NPPF advises that:

The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Paragraph 36 of the NPPF states that:

*Plans are 'sound' if they are:*

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategy matters that have been dealt with rather than deferred, as evidenced by a statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national; policy, where relevant.

Paragraph 37 confirms that:

*'These tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area'*

In this case, the 'relevant strategic policies for the area' are those contained in the East Herts District Local Plan 2018.

Table 10.1 of the Local Plan stipulates that Stanstead Abbots must accommodate a minimum of 94 new dwellings between 2017 and 2033. Stanstead Abbots is surrounded entirely by the Green Belt, and if the requirement for 94 dwellings is to be met, the release of some Green Belt land will therefore be required.

The manner in which that growth is to be met is the subject of the emerging NP. As indicated above, the site owner has engaged extensively in that process.

A comprehensive site appraisal and selection process by the Parish Council has resulted in the site allocations in the NP.



## Site Description

WEL's site is situated to the south of the village of Stanstead Abbots. It is comprised of an area of land occupied by buildings and hardstandings to the east of Netherfield Lane, and an area of greenfield land that sits between those former employment buildings and Roydon Lane to the north and east.

The existing 'employment area' at the south-western corner of the site (adjoining Netherfield Lane) comprises former offices, warehouses and storage buildings, surrounded by an area of hardstanding.

The now disused and unoccupied buildings cover an area of 2,792 square metres (footprint). The majority of the buildings are single-storey, although the building in the north-western corner of the site provided office accommodation at both ground-floor and first-floor levels. Being vacant, the site is beginning to show signs of degradation and disrepair.

The site is predominantly flat, particularly towards its northern and western extent. The area of land beyond the eastern boundary of the site does however have a noticeable incline from east to west.

Netherfield Lane is designated as a Bridleway (BR0019) and is an adopted, unclassified road. The section of Netherfield Lane between Roydon Road and the existing entrance to the site is currently subject to a 15 mph speed limit. To the south of the site, the road is not adopted, and serves a nursery and agricultural uses.

The Grade II\* Listed Baesh Almshouses form a small terrace of three properties immediately to the south of Roydon Road, adjoining the northern boundary of the site. The full listing description is included as follows:

TL 31NW STANSTEAD ABBOTS ROYDON ROAD (south side) Stanstead Abbots village 5/51 Nos 79 to 89 (odd) (The Baish Almshouses) and attached forecourt 4.12.51 wall) (Formerly listed as The Baish's GV Almshouses) II\*

Almshouses. 1653 for Sir Edward Baesh. Red brick in English-bond with a long steep old red tiled roof. A single storey row of 3 handed pairs of almshouses facing NW. Each pair has 2 plank doors together, in a heavy chamfered wooden frame, a 3-light ovolo-moulded casement window with iron central opening light for each house, a gable over the door with a single small 2-light ovolo-moulded window with leaded lattice glazing, and a shared central chimney with a pair of diagonally set shafts. Toothed corbel course below the eaves and low plastered plinth. Modern single-storey small additions at rear and each end. Red brick wall around elongated forecourt garden, taller at ends, reduced at front but with heavy sloped brick coping reinstated. Square gatepiers with stone caps and C20 wrought iron gate. A landmark at a bend in the road at the S end of the village.

The adopted East Herts Local Plan 2018 confirms that this site falls within land identified as the Metropolitan Green Belt. However, the developed part of the site is 'end of life' previously developed land – being covered in vacant built form and hardstandings.

## Planning History

The most relevant planning history is a planning application submitted under reference 3/20/0502/OUT. The description of that proposal was as follows:

*Outline planning application with all matters reserved except for access for demolition of existing buildings and redevelopment of vacant employment site with a mixed use development comprised of B1 (business) floorspace and 20 dwellings, together with associated access, parking and landscaping.*

Outline planning permission was granted for that development on 9th May 2023.

That proposal involved the comprehensive redevelopment of the previously developed part of WEL's landholding. An extract from the indicative site plan is included as follows:



### The Site Allocation

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.

Paragraph 143 of the NPPF confirms that the purposes of the Green Belt are:

- a) To check the unrestricted sprawl of large built-up areas;
- b) To prevent neighbouring towns from merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and special character of historic towns; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In light of the grant of planning permission for a mixed use redevelopment of a significant proportion of the landholding, the residual greenfield part of the site performs none of these functions of the Green Belt.

The site allocation effectively proposes mixed use (residential and commercial) development of the site – encompassing both the previously developed part that is the subject of Planning Permission 3/20/0502/OUT, and the residual undeveloped land that sits between the disused and dilapidated former employment buildings and Roydon Road.

The residential component would comprise sixty dwellings, in a range of 1 – 5 bedroom units. The development would incorporate both affordable housing, and new almshouses to complement the Baesh Almshouses. The new almshouses would be at the northern edge of the site, and laid out in a quadrangle arrangement relative to the existing almshouses.

Public open space is to be provided across the remainder of the northern portion of the site, and along the western boundary with Netherfield Lane. Safe rear access and parking is to be provided for the existing almshouses, where there is currently none

The allocation of this site – which already (at least in part) benefits from planning permission for residential development – is a common sense means of effectively and sustainably addressing most of the housing needs for the local area.

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.

It is on this basis that WEL commend the NP as a plan that is positively prepared, justified, effective, and consistent with national policy.

Yours faithfully,

**Paul Webster MRTPI**  
DIRECTOR

**Submission Details**

Case Reference Number | EHDC692913620

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**Part A**

I am: Responding as an individual

Name Beverly Theobald

Address

Email

Telephone Number

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**Part B**

Do you wish to be notified of the local planning authority’s decision to ‘make’ the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? General comment

Please state the relevant policy or paragraph number that you are commenting on. Planning

Do you wish to comment, support or object? Support

Please make you comment below and indicate any changes you are seeking. Our household fully supports development on the green and brown field sites in netherfield lane (Websters). It’s a total eyesore and is attracting very worrying attention. The sooner it is developed the better and the proposed plans look great.

## **SASM-14**

**From:** Andrea Gilmour  
**Sent:** 06 March 2025 10:47  
**To:** Development Management - Planning Policy EHC  
**Subject:** Stanstead Abbots and St Margarets Regulation 16 Consultation

Dear Planning Policy Team

The Property Planning Team on behalf of Hertfordshire County Council as landowner has no comments to make on the Stanstead Abbots and St Margarets Neighbourhood Area Plan Regulation 16 Consultation.

Thanks  
Andrea

Andrea Gilmour  
Property Planning Manager | Property | Resources  
Hertfordshire County Council  
2nd Floor, Robertson House, Six Hills Way, Stevenage SG1 2ST Postal Point: CHO313  
T: 01992 556477 (Internal: 26477) E:

## Submission Details

Case Reference Number | EHDC694378108

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### Part A

I am: Responding as an individual

Name Nicholas Cox

Address

Email

Telephone Number

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### Part B

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? General comment

Please state the relevant policy or paragraph number that you are commenting on. N/A

Do you wish to comment, support or object? Comment

**Please make you comment below and indicate any changes you are seeking.** The Stanstead Abbots neighbourhood plan experience proves that planning by algorithm is a very blunt instrument. If allowance had been made for flood zones, green belt and the Lea Valley Park, then the housing allocation would have been less and maybe achievable without the controversy resulting from building in our regional park and the further loss of greenbelt in a district that has already lost over 6% of its green belt – the largest loss nationally in percentage terms. With the Village 7 housing estate already approved and within walking distance from the Netherfield Lane site, it's difficult to view this other than as development for the sake of development and developing within the Lee Valley Park sets a dangerous precedent.

Part 2 paragraph 5 of the byelaws made under Section 28 of the Lee Valley Regional Park Act 1966 state that:

"No person shall without the consent of the Authority erect any barrier, post, ride or swing, building or any other structure ."

As far as I'm aware, consent has neither been sort nor granted and any attempt to proceed without consent would be a very clear violation of the Lee Valley Regional Park Act 1966.

Despite the government's war on newts and bats, environmental law still takes precedence over planning law and our neighbourhood plan cannot legally be implemented if environmental laws would be breached. Paragraph 180 of the NPPF is clear that planning permission should be refused for development that would result in significant harm to biodiversity and/or result in the loss or deterioration of irreplaceable habitats and the Lea Valley Park is undoubtably an irreplaceable habitat.

There is a line in Rudyard Kipling's famous poem "Danegeld", "once you have paid him the Danegeld, you never get

rid of the Dane." It's the same with property developers, sacrificing our land to appease them will never work, they just come back for more.

We need to develop a new approach to crack the housing crisis - we need a different way of delivering homes people can afford to rent or buy whilst protecting our green spaces.

## **Submission Details**

**Case Reference Number** | EHDC694982007

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### **Part A**

**I am:** Responding as an individual

**Name** John Hickford

**Address**

**Email**

**Telephone Number**

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### **Part B**

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** Specific comment

**Please state the relevant policy or paragraph number that you are commenting on.** 24.5 Air Quality

**Do you wish to comment, support or object?** Object

**Please make your comment below and indicate any changes you are seeking.** My main argument comes under 24.5 Air Quality:

From a Traffic Survey commissioned by Stanstead Abbots Parish Council I was shown that the Netherfield Lane development will result in about 60 additional car movements in the Village at peak times. It's estimated 2/3rds approximately 40+ vehicles would travel westbound and would significantly increase congestion and air pollution in the village caused by the queues for the train barrier continuously also frequently lifting at peak times.

The most sensible plan is to have any large scale development to the west of the village close to the main trunk routes at the Amwell roundabout taking traffic away from the village.

I raised this point at a SAPC meeting and it was argued that the additional traffic congestion would only be increased at the Amwell roundabout. I pointed out that there were very few pedestrians at the roundabout but many with children walking through the High Street every day.

Building close to the access point for major roads at this point is completely logical.

The sites to the west were all rejected on grounds of coalescence with Hoddesdon. But this ignores the industrial/urban coalescence with Harlow to the east of the village that will result from the Briggens Estate quarry and the Golston Garden Village Development and all the additional air pollution that will cause.

I would also argue that under 24.3.3 Tranquil Spaces; we lose exactly that with the loss of the open space behind the Almshouses.



Dear Stanstead Abbotts and St Margarets (and East Herts Council) Planning Policy Team,

**Network Rail Consultation Response to Stanstead Abbotts and St Margarets Regulation 16 Consultation 2025**

**Background**

Network Rail (NR) is the statutory owner and operator of the national rail infrastructure in England, Scotland, and Wales. NR's focus is on safely and efficiently operating, maintaining, and growing the railway. NR has provided important general comments to the Stanstead Abbotts and St Margarets Neighbourhood Plan (Within East Hertfordshire District Council area) regulation 16 consultation.

**Sub-Sections**

- 1) Development
  - a. Freight Sites – Strategic Importance for Policy and Development
- 2) Railway Infrastructure
  - a. Level Crossings
    - i. Maltings Level Crossing
  - b. Wider Infrastructure
- 3) Further Consultation Requirement & Future Policy Engagement
- 4) Asset Protection (ASPRO)
  - a. Appendix A – Aspro Informatives

**1. Development**

For future development schemes in the area and wider Hertfordshire County Council area, NR requires that if any new infrastructure requirements affect **NR** and the operational railway (including Stations, Maintenance Depots, etc.) then the appropriate agreements must be entered into by the promoters.

**a. Freight Sites – Strategic Importance for Policy and Development**

Freight sites and equivalent land uses require strategic support, inside and outside of the rail industry. This would include strategic support from planning policy. Planning policy in the context of policy designations for freight would be identified as applicable to any site and the surrounding area. Freight sites are of notable material consideration to all developments, whether the nearest freight site is either inside or outside any policy area, or the Council's area of jurisdiction.



In relation to any specific sites the form and type of development permitted, then there should be relevant planning policies identified at all levels - Including Neighbourhood plans or Masterplans. Especially as the strategic importance of this area of policy is evident at the National level, which is set out below:

### **National Planning Policy Framework [NPPF] (2023)**

- i. In the context of facilitating the sustainable use of minerals, **NPPF** Paragraph 215 is clear that it is essential that there is sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.
- ii. Paragraph 216 (e) provides that planning policies should: "safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material" (our underlining).

## **2. Railway Infrastructure**

NR has a key requirement to manage risk appropriately across the network. For this policy, and any consultation, Network Rail will have concerns about any elements which at this stage do not provide enough detail but will more than likely involve the railway to achieve these end goals. Thus, greater clarity on any existing or, assumed, funding arrangements, which might possibly include or depend on legacy / historic funding mechanisms which are no longer available should be raised and discussed at the earliest opportunity.

### **a. Level Crossings**

NR opposes developments which will result in intensified use of level crossings unless the affected risks are mitigated. The preferred mitigation is usually closure of the level crossing, either by extinguishment, diversion, or bridging. These mitigations must be at the developer's cost.

Aside from the impact on safety, all things being equal, the presence of level crossings on the network makes improvements to train speeds and/or service frequencies more onerous to implement.

### **Malting Level Crossing**

There is no reference in this policy consultation to Maltings Level Crossing (LC), which is on the edge of a settlement area, and is at the Hertford end of St Margaret's station. It is an industry aspiration to close Maltings level crossing. There are no public rights over the crossing. The affected landowners will be contacted when and if funding to develop and deliver this project becomes available. Especially, investment into the railway through 3<sup>rd</sup> party developer contributions.

### **a. Wider Infrastructure**

New crossings of the railway are possible, but these must be by bridge, and we would expect the resulting structure to be vested in the highway authority or another statutory undertaker. In all cases where new crossings of the railway are required, NR's shared value policy will apply.

There may also be some road bridges where enhancements to footway provision (necessitating a widening or restriction on traffic) are suitable. Again, we would expect the developer to fund any such works.

Aside from bridges and crossings, improvement to railway boundary fences may be required if areas that are currently remote are developed for housing or industry. We would expect developers to fund necessary upgrades.

### **Green Buffer**

Any Proposals for any green buffer near to the operational railway, whether new or alteration of existing must be consulted with our Asset Protection (ASPRO) team as this can increase risk onto the railway. Network Rail will also require confirmation of proposal on and adjacent to our land and the wider railway infrastructure corridor.

### **3. Further Consultation Requirement**

Furthermore, it is difficult at this early policy stage, and from the information provided to determine exactly what the impacts will be or where all the sites will be. Therefore, NR requires the Council make it a requirement for appropriate developers to consult with us in the future as plans develop at each site.

However, for information, please find enclosed a series of informatives that should be taken into account for any works or proposals that are in proximity to NR's infrastructure. NR is keen to engage with the Council and would welcome the opportunity to be involved in the ongoing preparation of this and other subsequent planning policy and East Herts Local Plan consultations.

### **Future Policy Engagement**

NR would welcome the opportunity to discuss further policy and possible site policy protection and infrastructure intensification of land in East Herts Council area, whether the extent of this/other plan(s) impacts NR on the local, regional, or national level. We particularly welcome the opportunity to work with the Council in relation to its urban regeneration aspirations.

NR places importance on sustainability, infrastructure plans and intensification of sites impacting the operational railway. Therefore, sites should not be assumed to not have any impact and allocated favourable in policy for any residential or mix-use allocation, unless it is supported by and of benefit to the railway undertaker or is confirmed to be of no notable detrimental impact to the railway.

Please do not hesitate to contact us if you have any questions. Please contact me on or, email me at if you, as well as other stakeholders, have any queries on this matter or require any further information.

We look forward to engaging with Stanstead Abbots and St Margarets Parish(es) and East Herts Council on developing this Neighbourhood plan consultation and the Local Plan.

Yours Faithfully,  
David Brierley

**Town Planner**

## **Appendix A - Asset Protection (ASPRO) Informatives**

### **Proposal(s) Risk Mitigation Requirements:**

- *Please note, not all these requirements may be applicable to this policy at this stage but will be required during design policy adoption and any future developments.*

### **SAFETY:**

Any works by the developer on the land adjacent to Network Rail (NR) infrastructure will need to be undertaken following engagement with NR ASPRO to determine the interface with NR assets, buried or otherwise and by entering into a BAPA (Basic Asset Protection Agreement), with a specified minimum notice period before commencement of physical works on the site. Risk of Building glare will need to be considered and must not cause NR drivers any sighting issues.

### **Fail Safe Use of Crane and Plant**

All operations, including the use of cranes or other mechanical plant working adjacent to NR's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no materials or plant are capable of falling within 3.0m of the nearest rail of the adjacent railway line, or where the railway is electrified, within 3.0m of overhead electrical equipment or supports.

With a development of a certain height that may/will require use of a crane, the developer must bear in mind the following. Crane usage adjacent to railway infrastructure is subject to stipulations on size, capacity etc. which needs to be agreed by the Asset Protection Project Manager prior to implementation.

### **Excavations/Earthworks**

All excavations/earthworks carried out in the vicinity of NR property/structures must be designed and executed such that no interference with the integrity of that property/ structure can occur. If temporary works compounds are to be located adjacent to the operational railway, these should be included in a method statement for approval by NR. Prior to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for the approval of the Local Planning Authority acting in consultation with the railway undertaker and the works shall only be carried out in accordance with the approved details. Where development may affect the railway, consultation with the Asset Protection Project Manager should be undertaken.

NR will not accept any liability for any settlement, disturbance or damage caused to any development by failure of the railway infrastructure nor from any noise or vibration arising from the normal use and/or maintenance of the operational railway. No right of support is given or can be claimed from NR's infrastructure or railway land.

### **Security of Mutual Boundary**

Security of the railway boundary will need to be maintained at all times. If the works require temporary or permanent alterations to the mutual boundary the applicant must contact NR's Asset Protection Project Manager.

### **FENCING:**

NR's existing fencing/ wall must not be removed or damaged and at no point either during construction or after works are completed on site, should the foundations of the fencing or wall or any embankment be damaged, undermined or compromised in any way. Any vegetation on NR land and within NR's boundary must also not be disturbed.

### **DEMOLITION:**

Any demolition or refurbishment works on site must be carried out so that they do not endanger the safe operation of the railway, or the stability of the adjoining NR structures and land. The demolition of the existing building, due to its close proximity to the NR boundary, must be carried out in accordance with an agreed method statement. Approval of the method statement must be obtained from the NR Asset Protection Engineer before the development and any demolition works on site can commence.

Considering the above paragraph, if permission is granted for the development, NR requests that a planning condition requiring the approval of the proposed demolition methodology is attached to the consent. Please contact NR if you would like to discuss this further.

### **Vibro-impact Machinery**

Where vibro-compaction machinery is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Local Planning Authority acting in consultation with the railway undertaker prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

### **Scaffolding**

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed.

### **Bridge Strikes**

Applications that are likely to generate an increase in trips under railway bridges may be of concern to NR where there is potential for an increase in 'bridge strikes'. Vehicles hitting railway bridges cause significant disruption and delay to rail users. Consultation with the Asset Protection Project Manager is necessary to understand if there is a problem. If required there may be a need to fit bridge protection barriers which may be at the developer's expense.

### **Abnormal Loads**

From the information supplied, it is not clear if any abnormal loads will be using routes that include any NR assets (e.g. bridges and level crossings). We would have serious reservations if during the construction or operation of the/any site, abnormal loads will use routes that include NR assets. NR would request that the applicant contact our Asset Protection Project Manager to confirm that any proposed route is viable and to agree a strategy to protect our asset(s) from any potential damage caused by abnormal loads. I would also like to advise that where any damage, injury or delay to the rail network is caused by an abnormal load (related to the application site), the applicant or developer will incur full liability.

### **Site Layout & Two Metre Boundary**

Consideration should be given to ensure that the construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of, or encroaching upon NR's adjacent land, and therefore all/any building should be situated at least 2 metres from NR's boundary. This will allow construction and future maintenance to be carried out from the applicant's land, thus reducing the probability of provision and costs of railway look-out protection, supervision and other facilities necessary when working from or on railway land.

Where trees exist on NR land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines.

## **ENCROACHMENT**

The developer/applicant must ensure that their proposal, both during construction, and after completion of works on site, does not affect the safety, operation or integrity of the operational railway, NR and its infrastructure or undermine or damage or adversely affect any railway land and structures.

There must be no physical encroachment of the proposal onto NR land, no over-sailing into NR airspace and no encroachment of foundations onto NR land and soil. There must be no physical encroachment of any foundations onto NR land. any future maintenance must be conducted solely within the applicant's land ownership. Should the applicant require access to NR land then must seek approval from the NR Asset Protection Team. Any unauthorised access to NR land or airspace is an act of trespass and we would remind the council that this is a criminal offence (s55 British Transport Commission Act 1949). Should the applicant be granted access to NR land then they will be liable for all costs incurred in facilitating the proposal.

### **Access to the Railway**

All roads, paths or ways providing access to any part of the railway undertaker's land shall be kept open at all times during and after the development.

## **Response to the Stanstead Abbots and St Margarets Neighbourhood Plan**

### ***Use of Green Belt***

The use of green belt to provide housing is an unacceptable outcome to this neighbourhood plan and as a local resident and parish councillor, I am appalled at the need to resort to using Green Belt land in the Lea Valley Park. In resident surveys during the Neighbourhood Plan consultation there was an overwhelming response to not develop on Green Belt land and this plan has completely ignored the views of the local residents.

The Netherfield Lane site is an area of natural beauty and to devastate it with housing is wholly unnecessary especially when other sites were overlooked that were not classified as green belt.

There has clearly been concern that coalescence with neighbouring town and villages is to be avoided and this has been a key aspect when removing other sites for house building and yet the Netherfield Lane site is going to be a short walking distance from the new Village 7 housing development and this does not seem to have created the same level of objection from within the neighbourhood plan group.

The use of Green Belt should not be used as it will compromise residents' quality of life, compromise the rural aspects of our landscape and ruin the enjoyment for so many people in the local community, who will treasure living in this rural part of the village.

With an invasion of housing from Harlow reaching out towards Stanstead Abbots, we need to protect the precious Green Belt to maintain our boundaries, not develop it so that we join up with a massive urban sprawl and a potential quarry.

### ***Environmental Impact***

There is the unknown and significant risk of a quarry development within a few hundred yards of Netherfield Lane, it is completely inappropriate for the Parish Council to propose and East Herts Council to approve, to build further new housing so close to something that may cause significant health issues for residents as well as the noise pollution and increased traffic that will undoubtedly occur. Being part of a Parish Council, that has previously acknowledged that the approval of the quarry would be a horrendous outcome for local residents, it seems too high a risk to take, to build so close to what may be decades of noise and pollution.

The neighbourhood plan also references the East Herts District Plan, stating that development which would result in the loss or significant change to trees, hedgerows or ancient woodlands will not be permitted and yet the Netherfield Lane site has already seen the decimation of dozens of trees and hedgerows by the landowner and further will follow with the building of housing. This surely breaches the policies laid down in the East Herts District Plan.

It is also understood that there may be significant land contamination on the fringes of the site that relate back to when the site was used as a lighting business.

### ***Flooding***

Netherfield Lane and neighbouring properties on or adjacent to the Roydon Road have experienced a significant increase to the risk of flooding.

The area has already seen a worsening situation over the past decade with flooding now more frequent and severe. More properties are affected and this risk will be heightened should there be house building on green fields in an area prone to flooding.

Flood defences cannot cope with the volumes of rainfall now seen and even though plans are being made to improve existing flood defences, there is clearly an unknown factor as to whether these will improve the situation as well as the risk that public funds are insufficient to maintain flood defences and they then fall into disrepair. An increase in housing and a loss of green fields can only make the situation worse.

It would be a horrendous outcome for residents who already live in fear of flooding to have an increased risk to their land and property especially when there are other land options locally that would not create the same level of flood risk.

### ***Noise and Light Pollution***

There is also the risk of light pollution to residents in the vicinity of Netherfield Lane. This area is in the Lea Valley Park and therefore street lighting and lighting from housing is either non-existent or very low level. These residents will be directly impacted by a development in an area that has little maintained lighting and enjoys the rural aspect of living on the outskirts of a small village. Residents that enjoy the rural aspects of living on the fringes of Stanstead Abbots will be severely compromised by light and noise pollution and any development on the Green Belt land will be an unacceptable infringement on their quality of life.

### ***Conclusion***

To conclude, there are thousands of new homes being built within walking distance of Stanstead Abbots and it is completely unnecessary to sacrifice Green Belt land for the sake of a further 40 homes. The Lea Valley Park will provide invaluable opportunities for the new residents of these developments and we need to protect the Green Spaces that we have. There are other options to build that do not use Green Belt land as well as the option to remove the need to build these 40 homes especially given the impact it will have on the local environment and the open green spaces provided by the Lea Valley Park.

Councillor Geoff Hayter

Stanstead Abbots Parish Council

Dear Sir/Madam Policy Team

**Ref: Stanstead Abbots and St Margarets Neighbourhood Plan Neighbourhood Plan Regulation 16 Consultation**

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: [<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>](https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/)

We would be grateful if you would notify us on [eastplanningpolicy@historicengland.org.uk](mailto:eastplanningpolicy@historicengland.org.uk) [<mailto:eastplanningpolicy@historicengland.org.uk>](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James

Historic Places Advisor, East of England

Dear Laura

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

Thank you for consulting the Regional Park Authority on the draft Stanstead Abbots and St Margarets Neighbourhood Plan (SASMNP). A report on this matter was considered by the Authority's members, at the Lee Valley Regeneration and Planning Committee on the 27th February 2025, when the following representations were agreed.

#### **Draft Neighbourhood Plan**

##### **Vision and Objectives**

The Authority maintains its support of the vision and objectives for the Stanstead Abbots and St Margarets Neighbourhood. These provide a sound framework for the Neighbourhood Plan in terms of protecting and enhancing the natural environment, its heritage assets and community facilities and for the promotion of sustainable development.

The relationship between the attractive villages of Stanstead Abbots and St Margarets and the Regional Park, has previously been highlighted. The open and waterside spaces, wildlife, and range of walking/cycling routes within the Regional Park offer a variety of leisure and recreational opportunities which bring benefits to the health and well-being of the communities and the economy of the local area, whilst Stanstead Abbots and St Margarets provides important facilities and services both for those visiting the Park, and for regular users.

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

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

The additional references to the Lee Valley Regional Park and the relevant Park Development Framework (PDF) Area Proposals now included within the section on 'Local Planning Policy' is welcomed, as is the reference to the Regional Park and the PDF Area 8 Proposals added to the narrative for the housing allocation H3 which is located on land within the Park.

Detail about the remit of the Regional Park Authority is still missing however and should be included to provide the context for the PDF and the Authority's role. The following wording could be added to the existing Neighbourhood Plan text at para 2.7 (bold text below) with a link included to the Lee Valley Regional Park Development Framework web page as follows:

<https://www.leevalleypark.org.uk/park-development-framework>

**2.7 "Created by the Lee Valley Regional Park Act in 1966, (the Park Act), the Lee Valley Regional Park Authority (LVRPA) is a key stakeholder in the District. It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. The Authority is required to prepare a plan setting out proposals for the future management and development of the Regional Park, currently the Park Development Framework (PDF). The neighbourhood plan area is covered by the PDF Area 8 Proposals (April 2019) which cover the northern most section of the Regional Park, stretching from Rye House and RSPB Rye Meads Nature Reserve in the south to the edge of Ware in the north alongside the River Lee Navigation.....**

A reference could also be added to the EHDC Local Plan policy and supporting text under policy CFLR5 'The Lee Valley Regional Park' as this describes the Regional Park and supports the PDF.

#### **Housing**

##### **Site Allocation H4**

It is noted that a couple of site allocations previously identified as part of the SASMNP, have been omitted from the Plan, including Site 'H4' which forms the northern part of the Lee Valley Marina, Stanstead Abbots (approx.0.3ha). This is due to the



concerns about site constraints, in particular the flood risk associated with these sites (Site H4 is within flood zone 2 and 3(a)) and in terms of H4, uncertainty about site capacity. The constraints associated with the site including flood risk are understood by the Authority and have previously been raised by the District Council in discussions with officers.

The Authority's position as regards Marina operations has not changed, and this together with the site constraints does raise issues about the inclusion of this site as a housing allocation at this time. It would not however prevent the site coming forward as a Brownfield and Windfall site under Policy SASM H5.

### **Site Allocation H3**

The Authority notes the changes made in supporting text to Policy H3 and that consideration has been given to the comments raised by the Authority in respect of the site allocation H3 'Land East of Netherfield Lane'. The reference to the site being within the Park boundary (para 4.25) is welcomed as is the account taken of the PDF Area Proposals in terms of retaining and strengthening vegetation along the boundaries and ensuring sufficient land is included within the development to provide a green barrier to mitigate any adverse impacts on the Lee Valley Park landscape.

However, the site allocation remains the same and as previously, 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.

The Authority set out its policy position in its previous consultee response (24 March 2023) in respect of this site allocation. Whilst the policy criteria included in H3 under bullets III and IV e) and IV j) offer some comfort there is no guarantee as to the final layout and design for the site given the need to meet housing needs and ensure a viable development. The recommendations made by Natural England in their consultee response are key in this respect in that 'any future proposals should focus on existing hard surfaces/developed areas where possible and ensure that existing green corridors are not compromised and continue to provide connectivity to those priority habitats'.

As previously stated, 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 as part of this response to the SASMNP.

### **Riverside and Heritage**

Policy SASM R1 Riverside Development covers an important element of the neighbourhood in terms of the competing demands placed upon the riverside and the waterside environment especially when development is proposed alongside or adjacent to the river. The additional wording in supporting text para 6.4 which states that "light pollution should be avoided and the enjoyment of wildlife by visitors to the riverside and to other waterbodies in the area should be encouraged" is supported, this addresses in part the comments previously raised by the Authority.

A reference to the ecological significance of the river and waterside environment and how impacts from development and associated uses can be avoided or minimised is still considered appropriate however, in particular a policy reference to maintaining dark corridors could be added under R1, to recognise the importance of waterways and the waterside environment for foraging and commuting wildlife which connect with other habitats up and down the valley.

## Heritage

The Authority supports the detailed section on heritage retained within the SASMNP and Policy HA1 Designated Heritage Assets which requires the significance of designated heritage assets and their settings to be preserved and enhanced. The PDF Area 8 Proposals have identified Rye House Gatehouse Scheduled Monument and the River Navigation as important heritage assets to be preserved and enhanced within the Neighbourhood Plan area.

It is noted that the point previously raised by the Authority about engaging with developers to raise awareness and provide accessible information about heritage assets is to be addressed via the Action Plan. An additional objective and action point is included under Action H3 which states "Disseminate Heritage information on website and notification boards so the community better understands the nature and value of its surrounding heritage". the resources for this are stated as 'unknown' but the SASMNP could identify developer contributions as a mechanism for securing some of the resources where appropriate.

The Authority also suggested consideration should be given to the importance of the industrial heritage of the Lee Navigation as a key feature of the Regional Park in the context of the Neighbourhood Plan. The Steering Group response included in the Consultation Statement (at Appendix 26) suggests this matter is dealt with in the District Plan a reference to the relevant section/policy would be helpful to ensure this aspect of the heritage resource is protected.

## Views

Policy SASM HA4 'Protected Views' retains the 12 views originally identified to be protected from inappropriate development. The additional view suggested by the Authority identified in the Lee Valley Regional Park Landscape Strategy has not been added. This is the long view both out to and from the rural valley sides to the east. It is described as a key characteristic for Landscape Character Area G1 'Ryegate Farm/Terbets Hill' as "long views from the valley slopes across open bodies of water and wetlands within the Lee Valley floor..." The aim of the Landscape Strategy for this area (which includes the landscape east of Netherfield Lane) is "to retain its function as a rural backdrop and skyline in views from the floodplain". It is still considered relevant to propose the inclusion of this view within the SASMN as this is an important part of the landscape character of the area.

## Natural Environment

The Authority maintains its support for Policy NE2 'Nature Conservation'; this seeks to protect the designated sites such as the Lee Valley SPA/Ramsar Site, and the Rye Meads SSSI and complements the Local Plan Policy. A plan mapping the various nature conservation sites would be a helpful addition to the SASMNP given the significance of these designations and the value of Local Wildlife Sites such as Stanstead Innings. The consultee response in the Consultation Statement suggests this point is 'dealt with elsewhere', but a plan showing the designations could easily be included alongside the suite of other plans attached as appendices to the SASMNP which identify protected views and local green spaces for example.

## Biodiversity Net Gain

The minor amendments to Policy SASM NE2 'Nature Conservation' are noted and the policy statement that development proposals must conserve and enhance biodiversity and deliver biodiversity net gains of at least 10% is endorsed. Any measures to deliver BNG as outlined in the Policy should be informed by the Authority's BAP and a reference to this document should be included in supporting text. The PDF Area Proposals also identify a number of actions and projects in relation to biodiversity and habitat enhancement as well as measures to improve access to nature.

The Authority supports the emphasis in new supporting text under para 8.45 that all development within the SASMNP should "seek to achieve on-site BNG contributions wherever possible" and that it is proposed that an Action Plan will be developed to identify suitable locations for potential off-site benefits within the Neighbourhood Plan boundary should they be required.

It is important that this action is transferred into the SASMNP Action Plan at Appendix J. The development of an action plan to identify suitable locations for off-setting should be included under Action E2 to provide greater clarity on this point. Officers would welcome the opportunity to discuss potential sites for off-setting within the Regional Park where appropriate.

Policy SASM NE4 'Environmental Impact of Flooding' has been amended to extend the width of the undeveloped buffer provided as part of development from 5 to 8 metres from the top of waterway banks, as requested by the Authority. This is welcomed as this will now meet the Environment Agency requirements and provide ecological benefits.

## Leisure and Tourism Policy

The Authority maintains its support for Policy SASM B4 'Farm and Tourism Related Business' which has been retained within the revised SASMNP. Policy support for development of leisure and tourism uses that support delivery of the PDF Area 8 Proposals (B4 bullet point II) is welcome as is the specific reference to the Stanstead Marina and its role in supporting recreational use of the waterways.

It is also worth raising again the potential benefits of widening the locational scope for the provision of new visitor accommodation beyond the confines of the village (as currently stated in policy under B4 bullet point III) providing this is still in association with leisure uses, social and educational functions. Currently Policy SASM CL4 New Facilities suggests the location of new tourism accommodation should be in the village but there may be scope in the future for visitor accommodation in the Regional Park within the wider area of the Neighbourhood Plan. Officers are still open to exploring this matter with the SASMNP Steering Group and other relevant stakeholders in the future.

## **Transport**

The Authority supports the policy emphasis on protecting the village from unacceptable increases in traffic volume and the need to maintain the safety of pedestrians and cyclists. Support for development that respects and enhances PROW is an important addition to Policy TR1 'Safe and Sustainable Transport'. This could be expanded to take account of the importance of enhancing and protecting other routes provided in the Park, for example those that combine with PROW to create circular routes for pedestrians/cyclists, the Lee Valley Pathway which connects through to the Neighbourhood Plan area south of the A414 and the Lea Valley Walk along the towpath.

The needs and safety of visitors to the Regional Park and wider neighbourhood plan area should also be considered; they are likely to be moving on foot or bicycle through the neighbourhood area, along the towpath and within the open spaces and parkland areas as well as crossing between the Park's entrance points. It is noted that the neighbourhood plan Action Plan includes a number of projects that could be relevant in this respect including T2 which aims to improve road safety at key road junctions. This should consider safe crossings for pedestrians and cyclists. Project T1 to promote the installation of publicly accessible EV charging points, T4 which looks at providing secure cycle parking facilities at suitable locations and T6 which aims to improve provision of bus services that connect the village with nearby centres would all assist visitor access and are supported.

## **Implementation**

The SASMNP will be implemented primarily through the determination of planning applications by East Herts District Council and the Plan policies will provide the criteria against which planning applications are assessed and inform Section 106 agreements. The Authority notes that the Action Plan at Appendix J to the SASMNP identifies the spending priorities for the community; this has been revised and expanded particularly for the Environment topic which is supported. The Authority would welcome the opportunity to consider whether there is scope to include other priorities within the Action Plan for example in relation to biodiversity net gain or to secure other improvements to the natural environment and the accessibility of the wider Stanstead Abbots & St Margarets Neighbourhood area and Regional Park. This would be another matter for future discussion between the Authority and the SASM Neighbourhood Steering Group.

The Authority would wish to be kept informed of the next stage of the SASMNP as it proceeds to Examination and looks forward to further engagement with members of the SASM Steering Group in due course.

Yours sincerely

Claire Martin

**Head of Planning**

**Lee Valley Regional Park Authority**

## Submission Details

Case Reference Number | EHDC695541637

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### Part A

I am: Responding as an individual

Name Andrew Day

Address

Email

Telephone Number

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### Part B

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? General comment

Please state the relevant policy or paragraph number that you are commenting on.

Do you wish to comment, support or object? Support

**Please make you comment below and indicate any changes you are seeking.** The Neighbourhood Plan process has been a very thorough, well-managed piece of work by a dedicated team over a long period of time.

The result of the teams deliberations, ie the recommendation to put forward "H3 Land to the East of Netherfield Lane" as the preferred site for what will be the bulk of the required dwellings is, I believe, correct and in my opinion the only logical one.

The Websters brownfield site cries out for redevelopment and the field alongside, although classified as 'Green Belt', has never, to my knowledge, been cultivated or used for anything. It would therefore be much better used for housing.

Dear Sirs,

**Stanstead Abbots & St Margarets Neighbourhood Plan 2017-2033 Regulation 16  
Consultation  
Land west of Stanstead St Margarets, off the Station Road (Site No.C2)**

I am writing to you in relation to the consultation of the Draft Neighbourhood Plan (Regulation 16) consultation document.

I act on behalf of Catesby Estates, who have an interest in the land to the west of Stanstead St Margarets and St Margaretsbury Recreation Ground (known as Site No. C2}, and have been promoting the site for development throughout the Neighbourhood Plan process. A copy of a site location plan outlining this land in red is attached to this letter.

Also attached to this letter of representation, a Councillor Briefing Note that was submitted to the Parish Council on 25th November 2020, explaining the proposals for this land and how it could deliver up to 94 No. residential homes (including 37 affordable homes representing 40% of the total number), additional recreational open spaces, community allotments and provision of a public car park. The Councillor briefing note highlights the highly sustainable location for development Site No. C2 presents on this western side of the village, near to its High Street and railway station. It also highlights the significant positive attributes of amending the Neighbourhood Plan housing allocation strategy to include the site west of Stanstead St Margarets.

PJB Planning Ltd submitted representations to the Neighbourhood Plan Regulation 14 consultation document in a letter dated 30th March 2023.

Since making this submission to the Regulation 14 consultation, a number of evidence documents have been prepared to support a revised version of the Neighbourhood Plan. This representation therefore focuses on the evidence that has been prepared along with the revisions to the Neighbourhood Plan.

It also reviews whether the Neighbourhood Plan is "sound" based on whether it is justified, effective and consistent with current national policy contained within the NPPF 2024.

**Evidence Base and SEA**

An Evidence Base document has been prepared and included on East Herts Council's website that provides background information to the preparation of the Neighbourhood Plan, including the designation of the Neighbourhood Area, gathering of information from residents, housing requirements and site selection.

Section 9 of the Evidence Base includes an "Overall Plan Health Check" prepared by AECOM . This independent health check was undertaken in January 2024.

Within this document there were a number of points highlighted within the Part 2 - *Content table* and Part 3 - *Detailed Comments* that required further work to be undertaken, to ensure the Neighbourhood Plan met the tests of "soundness".

In relation to housing and site selection, these outstanding matters can be summarised as follows:

- Further detail was required within the Basic Conditions Statement of the Neighbourhood Plan as to how it would secure and achieve sustainable development (Part 2, 2.4).
- It should be demonstrated that there is consensus between the Parish Council and East Herts District Council in terms of general conformity with the strategic development plan policies of the extant development plan (Part 2, 2.7).
- References to the NPPF require updating to reflect the latest version (Part 3, 19.).
- The process of site selection for the Neighbourhood Plan need to be demonstrably robust, particularly in relation to how potential sites were identified and how sites were subsequently assessed, discounted and allocated (Part 3, 22.).
- Policy SASM H2 establishes the 'housing numbers' for the plan which is predicated on the East Herts District Plan requirement of 94 houses over the Neighbourhood Plan period. The policy will require updating to reflect the latest iteration of the NPPF (Part 3, 23.).

Since January 2024 further work was undertaken on the Neighbourhood Plan, and, in June 2024, AECOM prepared a Strategic Environmental Assessment (SEA) to accompany the submission of the Neighbourhood Plan. The objective of the SEA, in line with the Regulations, is to identify, describe and evaluate the likely significant effects of implementing the Neighbourhood Plan, along with other reasonable alternatives.

The themes set out within the scope of the SEA included: biodiversity; climate change; health and wellbeing; historic environment; land, soil, and water resources; landscape; population and communities; transportation and movement. The emphasis of this appraisal was therefore focused on the sustainability credentials of the proposed site allocations in the Neighbourhood Plan and proposed alternative sites.

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 K and 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 than 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.

#### NPPF 2024 and East Herts District Plan 2018

A revised version of the NPPF was published on 12th December 2024 (updated 7th February 2025), and provides national planning guidance for plan-making purposes.

Paragraphs 8 and 10 of the NPPF highlight the overarching objectives to achieve sustainable development from an economic, social and environmental perspective, and promotes at the heart of the Framework a "*presumption in favour of sustainable development*".

Paragraph 11a) states that in relation to applying the presumption in favour of sustainable development:

*"For plan-making this means that:*

*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;"*

Emphasis is given to ensuring plans meet the development needs of their area.

Part b) i) of Paragraph 11 does highlight that strategic policies should, "as a minimum", provide for objectively assessed needs for housing, unless protected areas (such as Green Belt) provide strong reason for restricting the overall scale, type or distribution of development in the plan area.

Section 5 of the NPPF provides guidance on delivering a sufficient supply of homes, and paragraph 61 highlights the need to provide a significant boost for new homes, to meet housing needs, and to develop land with permission without unnecessary delay. Of particular note is that the new Government has reversed through the latest version of the NPPF, the way in which housing need is calculated and that it should again follow the standard methodology. Previously the local authorities could set their own housing targets.

In the case of East Herts, the previous annual figure of housing required (as of April 2024) amounted to 1,041 dwellings per year. Under the 2024 NPPF standard methodology, this figure increases to 1,265 dwellings per year. This therefore means there will be greater pressure on East Herts across the District to deliver more housing over the current District Plan period up to 2033.

In April 2024, East Herts confirmed that they had a 5.95 years supply, based on the annual 1,041 dwellings. However, through an appeal for 350 dwellings in Buntingford (Appeal reference APP/J1915/ W/24/3340497) in August 2024 (post June 2024 SEA), it was demonstrated that the Council in fact only had between 4.20 and 4.49 years of housing against the previous housing requirement. The Council therefore currently has an identified five year housing supply shortfall, which has worsened as a result of the latest housing requirement.

As a result of the 5 year housing supply shortfall, the Council's adopted District Plan Policy DPS1, 2 and 3 that relate to housing supply are out of date, and brings into question the validity of a Neighbourhood Plan that seeks to provide an amount of housing (94 dwellings) based on out of date District Plan policies.

Paragraphs 29, 30 and 31 of the NPPF provide guidance for non-strategic policies that include Neighbourhood Plans that give communities the power and opportunity to develop a shared vision for their area.

Paragraph 30 however states that, "*Neighbourhood plans should not promote less development than set out in strategic policies for the area, or undermine those strategic policies.*"

Footnote 17 to Paragraph 30 also states, "*Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.*"

What the guidance contained within paragraphs 29, 30 and 31 of the NPPF does not state, and, is left to interpretation, is where a District Council's strategic housing supply policies are out-of-date, how can a Neighbourhood Plan can be considered to be in conformity with those out-of-date District Plan policies. In this case, the issue is that the Neighbourhood Plan is seeking to agree a level of housing that will not meet the current levels of housing needed for the District based on the standard methodology.

Furthermore, Section 10.3 of the District Plan refers to development in villages, highlighting that Group 1 Villages will together accommodate "at least 500 new homes", between 2017-2033. Table 10.1 of the District Plan lists the Group 1 Villages (including Stanstead Abbots & St Margarets) as providing 10% growth during the Plan period to 2033, or a total of 597 dwellings. Stanstead Abbots & St Margarets 10% growth is identified as 94 dwellings. However, this is a minimum number of houses required and does not take into account the current increased housing need across the District that under the new NPPF has increased using the standard methodology.

It is therefore considered that the out-of-date nature of the housing policies contained within the District Plan brings into question the soundness of the Neighbourhood Plan, as to whether it is delivering the right level of housing to meet local and District needs.

The latest NPPF at paragraph 14 ensures that once made, a Neighbourhood Plan becomes part of the Development Plan for 5 years. In this case, the Neighbourhood Plan would therefore be in place until 2030, a full 12 years after the Local Plan was adopted. Along with current shortfall of delivering housing and the increasing District need for housing under the standard methodology, the Neighbouring Plan would be therefore out of sync with the growing needs for housing and under delivering against the District current and future requirements.

The NPPF 2024 also introduced the designation of grey belt land, within the Green Belt. Paragraph 148 highlights that, "*Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.*" This paragraph then goes on to highlight the need to promote sustainable patterns of development that should determine the appropriateness of the site with reference to paragraphs 110 and 115. These paragraphs promote development in locations that offer a genuine choice of transport modes. 17

It is also notable that paragraph 143 of the NPPF that sets out the five purposes of the Green Belt, and in particular purpose *a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; and, d) to preserve the setting and special character of historic towns*, refer to development adjoining towns and not villages. These three Green Belt purposes therefore do not apply to the consideration of land designation around Stanstead Abbots and St Margarets.

The implications of these NPPF paragraphs require the District Council to undertake a review of their Green Belt assessment and identify potential grey belt sites. As this has not been undertaken by the District Council, the Neighbourhood Plan is out of sync with the national planning requirements and a need for the District review of the Green Belt.

On this basis, the Neighbourhood Plan should either be found to be unsound, as it is not consistent current national policy in that it is not delivering the right level of housing to meet an identified need, or significant modifications need be made to the Neighbourhood Plan to take into account the increased levels of housing that will be required under the standard methodology approach and to take into account an updated Green Belt review taking into account the NPPFs grey belt designation.

### Neighbourhood Plan

The following section sets out more detailed comments about the Neighbourhood Plan:

#### *Paragraphs 1.11 and 1.12- Community Engagement*

Whilst the efforts of the NP Steering Group are noted, it is considered that in relation to Site No. C2, the local community has not been consulted or allowed to comment on the benefits that this scheme would bring to the village not only in relation to delivering housing in one site location, but also the additional recreational open spaces, community allotments and provision of a public car park that could be provided through this development. The allocation of Netherfield Road appears to be considered a foregone conclusion with no clear explanation provided as to why this is preferable to Site No. C2 and without any opportunity for the community to consider alternative proposals.

#### *Paragraph 3.4 - Objectives*

The Neighbourhood Plan sets out 18 No. objectives covering: Housing & Design; Riverside; Heritage; Natural Environment; Leisure & Community Facilities; Business and Employment; and, Transport.

Objective A seeks to promote sustainable development that provides for the current and future needs of the community, which my client supports and which we believe the development at Site No.C2 would provide for the village.

Objective J refers to maintaining irreplaceable species, promote ecosystem diversity and ensuring that development results in a net gain in biodiversity. It should be noted that in relation to Site No.C2 there is "on-site" land available and "off-site " land in close proximity to the site under the control of Catesby Estates that could provide in excess of the 10% biodiversity net gain.

The proposed housing sites that have been selected in the Reg 16 version of the Neighbourhood Plan have sought to squeeze and cram housing into any available spaces in and around the village seek to fully develop the sites for housing, with no or very little informal open space that could provide biodiversity opportunities. We would therefore question whether the 10% biodiversity net gain can be achieved on-site for or in close proximity to these developments, On this basis, it is questioned whether the Reg 16 Neighbourhood Plan is deliverable in terms of the housing allocations meeting this objective and other relevant policies in the Plan.

Objective L seeks to improve community, leisure & recreation facilities, and make these facilities accessible to everyone. Site No.C2 west of the village would deliver additional outdoor recreational facilities, allotments and provide public car parking in close proximity to the village's railway station and short walk to the High Street, easing the pressure for parking within the village. None of these planning gains will be provided by the other sites that have been proposed as housing allocations within the Reg 16 Neighbourhood Plan, and the Plan as it is currently drafted lacks initiatives or site specific policies to provide for the future community and recreational needs of the village.

#### *Paragraph 4.7*

This paragraph highlights how the village is surrounded by Green Belt and a statement is made that to amend the



Green Belt boundary and extend the village to accommodate land for housing, this has meant that any land released from the Green Belt needs to be adjacent to the village boundary. It should be noted that the proposed housing at Site No.C2 would be on the eastern side of the parcel of land and adjacent to the existing residential estate off Hillside Lane and village boundary on the northern side of Station Road (B181). The proposed housing at Site No.C2 would therefore comply with this Green Belt release requirements in that it is well contained to the south by the A414 and Station Road to the north, and does not project further west than the existing right of way that runs north east/south west through the centre of the overall site area.

It is also noted that the overall aim of the site selection focus shifted during the Neighbourhood Plan process. Rather than select one site that would meet most of the housing target and provide for housing needs of the village, the plan has sought to allocate several smaller sites within the village boundary.

However, in selecting the sites shown in the Reg 16 version of the Neighbourhood Plan, this approach fails to acknowledge and promote the other objectives within the Plan, most notably in terms of the need for the selected sites to deliver at least 10% Biodiversity net gain, affordable housing and providing for the future recreational and community needs of the village.

It is notable that 8 out of the 9 proposed allocations, and the windfall allowance of 6 houses, are less than 11 dwellings and therefore will make no contribution to affordable housing needs. The overall amount of affordable housing provided through the Neighbourhood Plan by following its strategy will result in considerably less than the 40% policy requirement and significantly less than what could be delivered on a single site in a district where the housing price is over 12 times the average earnings. At paragraph 76 of the Buntingford Appeal decision (Appeal reference APP/J1915/W/24/3340497), the Inspector afforded the delivery of affordable housing "substantial weight" in coming to his decision.

#### *Paragraph 3.11 and Policy SASM H1*

It is acknowledged that the protection of the Green Belt is one of the primary focuses of the Neighbourhood Plan and that in order to minimise the impact of openness, the NP Steering Group have focused on the delivery of one site that would need an amendment to the Green Belt and village boundary.

#### *Policy SASM H2*

Policy SASM H2 sets out the housing strategy to deliver a minimum of 98 new homes between 1st April 2017 and 31st March 2033. It is noted that this is stated as a "minimum", to ensure that there is a degree of flexibility and potential buffer in terms of delivering the number of houses during the Plan period to meet the local need.

From the list of sites referred to in Policy SASM H2 it is notable that only Site Allocation Policy SASM H3 is large enough to exceed the District Council's affordable housing threshold of 10 No. dwellings.

As such, only one site will deliver affordable housing and on that site only a 20 No. dwellings will be provided as affordable dwellings (including a 6-unit housing scheme made available to the Baesh Trust). This relates to 20 affordable homes (20%) of the 98 dwellings planned for during the Plan period. This is significantly below the affordable housing policy requirement of 40% in the District.

This housing strategy therefore lacks integrity in terms of meeting the aspirations of Objection B of the Neighbourhood Plan, which seeks:

*"To balance the market by providing new housing of a suitable size and type to meet those needs in acceptable locations."*

#### *Policy SASM H3*

It is noted that since the Regulation 14 consultation, planning permission has been granted for 20 homes on the site at land east of Netherfield Lane/south of Roydon Road under LPA reference 3/20/0502/OUT. No affordable housing has been provided of this development, on the basis of viability due to the substantial amount of remediation necessary to decontaminate the site.

In addition to the delivery of 20 no. market dwellings being provided through 3/20/0502/OUT, Policy SASM H3 seeks to deliver 40 dwellings. It is noted that criteria IV.b) of this policy states that 40% affordable housing will be required including a 6 unit housing scheme made available to the Baesh Trust (affordable rent). If taken on the total allocation of 60 dwellings, this 40% would relate to the delivery of 24 no affordable homes. Of the remaining 40 dwellings, 24 affordable dwellings amounts to 60% of that amount of housing. Bearing in mind a viability case was made for nil

affordable housing on the first 20 dwellings, it brings into question the viability and deliverability of 24 affordable dwellings, on the remaining part of the site identified by Policy SASM H3.

#### *Policies SASM H16*

This policy aims to provide a mix of dwellings and tenures that meet local needs and appropriate to the location, which is admirable. It is noted that Part II. refers to welcoming one and two-bedroom flats, particularly close to public transport routes. In relation to Site No. C2 west of the village, it is worth noting that the site is located a short walk from the village centre and railway station, and has the opportunity and capacity to deliver one and two-bedroom flats meeting the aspirations of this policy.

#### *Section 7 Heritage Assets and SASM HA4: Protect Views*

This section of the Neighbourhood Plan provides guidance on developments that would have an impact on heritage assets and identified non-designated heritage assets. Policy SASM HA4 also identifies twelve protected views within the village, with notable protected views 1 and 2 covering the site frontage of Site H3 at Netherfield Lane/south of Roydon Road .

In relation to the Site No. C2 to the west of the village, this site is located away from the village Conservation Area, with no impact on this heritage asset. It also would not impact on the setting any nearby Listed Buildings , and it is not affected by one of the protected views identified by the Neighbourhood Plan. The negligible impact of this site on the village's heritage assets and important views should therefore be taken into account in terms of progressing a further site selection prior to finalising the Neighbourhood Plan.

#### *Section 9 Leisure and Community Facilities*

This section provides guidance in relation towards meeting the aspirations of the Neighbourhood Plans Objectives K, Land M. Whilst the policies within this section seek to protect, maintain and support leisure and community village facilities there is no review of current levels of leisure facilities and what is required by the village during the plan period 2017 to 2033.

It is considered that this is a missed opportunity and that further consideration should be given to this issue within the Neighbourhood Plan, particularly in relation to recreational opportunities that could be provided for the village through the development of Site No.C2 to the west of St Margaretsbury Recreational ground. This land west of the village presents an opportunity to provide a significant area of both informal and formal outdoor recreation, including additional sports pitches, informal kick about areas, and parkland which the local community would benefit from. It is noted that Paragraph 8.11 states:

"The existing allotments are well used and further allotment provision in a suitable location would be supported."

This is further supported in Part I. criteria a) of Policy SASLM CL4 which supports the provision of additional allotments, in suitable locations.

Site No.C2 would provide the opportunity to deliver allotments within close proximity to the western side of the village, which none of the other sites that were considered through the Neighbourhood Plan process can provide and deliver.

#### *Section 11 Transport and Paragraph 11.3*

Section 11 sets out the Neighbourhood Plans strategy towards addressing transport and highway issues that affect the village. Paragraph 11.3 refers to the St Margarets train station, commenting that it is of "great importance", as it is a main line into London Liverpool Street and due to various factors including the introduction of the Oster facility and lack of parking restrictions in surrounding road, has led to it being a popular station.

Whilst this concern is acknowledged within the Neighbourhood Plan there are no specific policies that seek to address the issue of commuter parking at St Margarets train station. There is therefore a lack of strategic thinking as to how a more sustainable strategy could be brought about by the Neighbourhood Plan and specifically address the parking problem near to the railway station that has been identified by the local community.

Further consideration should be given to this issue through the Neighbourhood Plan process. Greater weight should also be given to the opportunity that arises at Site No.C2 to the west of the village that could provide public car parking within close proximity to the railway station, thus alleviating the on-road parking issues that exist within the village centre.

Associated with the train station is a level crossing within the heart of the village. The provision of parking at C2, on the western side of the village closest to the main arterial routes to the A10, could lessen traffic queuing at the level crossing. Instead the Neighbourhood Plan seeks to direct all allocations to the east of the level crossing thereby adding to the level crossing queue lengths. This locational benefit of C2 is not as highly ranked as it should be by the AECOM SEA site assessment.

### In conclusion

The Stanstead Abbots & St Margarets Neighbourhood Plan sets out a strategy to deliver housing within and around the village, with a primary focus of protecting the Green Belt that surrounds the village. It is also acknowledged that there are other significant constraints within the village that limits site opportunities for development, including flood risk and heritage considerations. The NP Steering Group, over a considerable amount of time, has undertaken a site selection process to arrive at the housing allocation strategy that is set out within the Regulation 16 Neighbourhood Plan.

However, considerable time has elapsed between the Regulation 14 and 16 versions of the Neighbourhood Plan, and there has been changes of circumstances at both national and District level that bring into question the soundness of the Neighbourhood Plan. This is primarily based on the situation that the East Herts District Council have a 5 year housing supply shortfall and there strategic housing delivery policies contained in the 2018 District Plan are now out of date. Through recent revisions of the NPPF and reinstatement of the standard methodology, the housing need for East Hertfordshire increases from 1,041 dwellings per annum to 1,265 dwelling per annum.

This has led to East Herts Council publishing an updated Local Development Scheme in October 2024, that sets out a timetable to review the District Plan with a target adoption date of June 2028.

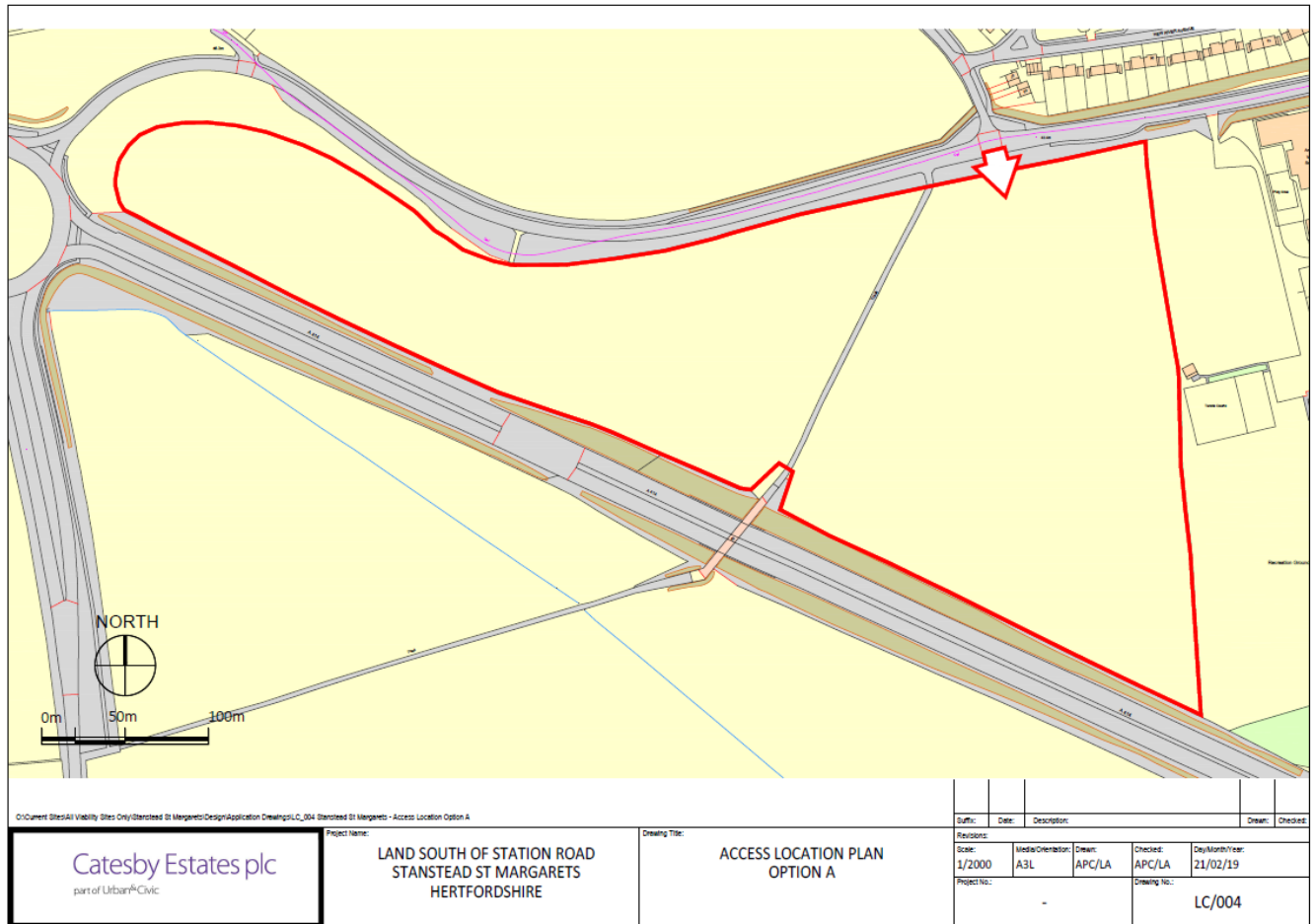
There is also a need under the NPPF 2024 for the District to undertake a Green Belt review that will have to consider grey belt land.

For these reasons the soundness of the Neighbourhood Plan is brought into question as it fails to deliver the increased levels of housing to assist with meeting the identified increased need and numbers of housing for the District as a whole, and is ahead of a Green Belt review under the **NPPF** 2024 requirements of paragraph 148.

Please can you therefore take these comments into account in reviewing the Regulation 16 Neighbourhood Plan, and we would request the opportunity to make further representations at the examination if it proceeds.

Yours sincerely,

**Peter Biggs BSc (Hons) DIP TP MRTPI Director**  
**PJB Planning Ltd**



25th November 2020

Dear Councillor,

### A COMMITMENT TO DELIVERING AFFORDABLE ENERGY EFFICIENT HOMES AND NEW COMMUNITY FACILITIES FOR STANSTEAD ST MARGARETS

Following your Parish Council meeting in October, we understand that the emerging Neighbourhood Plan seeks to deliver the required 94 homes through a number of small sites. 58% of the housing is proposed on infill or brownfield sites, and one site is a partially brownfield site which has already been refused at planning appeal due to loss of employment land. This strategy raises a number of questions, not least the ability of this strategy to deliver the much-needed affordable local housing and additional desirable community facilities, as many of these sites are simply too small to be economically viable to do so.

Many of the proposed sites also fall within existing areas of informal parking or conservation areas, have mature tree coverage, ownership challenges and are located in flood zones, all of which are characteristics which make them extremely challenging to deliver. This is recognised by the Neighbourhood Plan which identifies the many and varied difficulties in actually building this much needed housing on these sites, let alone achieving wider community benefits.

The Covid-19 pandemic has shone a bright light on the housing crisis with many families squeezed into inadequate homes and young people with no option but to live with their families. It is clear that adequate housing remains unavailable and unaffordable to many. As you will be aware Catesby Estates has been promoting land for residential development in Stanstead St Margarets through your Neighbourhood Plan process. The site we are proposing is St Margaretsbury Place, located south of Station Road, Stanstead St Margarets, which has been identified as potentially suitable for release from the Green Belt to meet local housing need. This well-located site has very good connectivity, as it benefits from easy access onto the A10 and A414 without travelling through the village, close proximity to the train station, and is free from technical constraints. We are proposing a rich and varied mixed development which features a range of significant community benefits alongside green housing, all of which will be designed with the future needs of the community in mind.

### OUR PROPOSALS INCLUDE:

- f Land for 40% affordable housing including shared-ownership and first-home dwellings
- f Additional playing fields for the cricket and football clubs
- f Additional village car parking to help ease parking pressure on surrounding streets at the train station
- f Allotments and footpath/cycle routes
- f Attractive public open space which can be transferred in perpetuity to the Parish Council

We will be continuing to promote this site for residential allocation through the emerging Local Plan Review but we want to highlight the opportunity for delivering affordable and greener homes in your emerging Neighbourhood Plan.

This site can offer significant public benefits to existing residents of Stanstead St Margaret and Stanstead St Abbotts over and above just housing through the proposed community facilities. The current Neighbourhood Plan housing proposals include no public benefits for existing residents.

We would be very interested in a Teams or Zoom call with you and your colleagues in order to discuss this site in more detail. I look forward to hearing from you.



Dear Sir/Madam

**Standstead Abbotts & St Margarets Neighbourhood Plan - Regulation 16 Consultation**

Thank you for your consultation on the above dated 30 January 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England has reviewed the Regulation 16 consultation of the Standstead Abbotts & St Margarets Neighbourhood Plan and accompanying appendices, together with the Habitats Regulations Assessment (HRA).

In our previous response (Ref: 421993, 03 April 2023) we commented in detail on proposed allocated sites as well as specific policies on Climate Change, Best and Most Versatile Agricultural Land, and Green Infrastructure.

We are very pleased to see that comments made at the previous draft of the neighbourhood plan have been taken on board and incorporated into the revised reg 16. We especially welcome the inclusion of the Green Infrastructure Framework (para 5.15) and specific reference to green roofs, bird boxes/bee hotels, as well as policy SASM NE2 which takes account of our comments regarding mitigation for nationally protected sites within the Neighbourhood plan boundary.

We refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully  
Sally Wintle  
Consultations  
Team

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic<sup>1</sup>](#) website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here<sup>2</sup>](#). Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here<sup>3</sup>](#).

There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority  
If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on soil types and Agricultural Land Classification is available (under the [Magic<sup>4</sup>](#) website and also from the [LandIS website<sup>5</sup>](#), which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework<sup>6</sup>](#) sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance<sup>7</sup>](#) sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

### Wildlife habitats

<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts on priority and protected species

[here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

### Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.

- Creating a new pond as an attractive feature on the site.

- Planting trees characteristic to the local area to make a positive contribution to the local landscape.

- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.

- Incorporating swift boxes or bat boxes into the design of new buildings.

- Think about how lighting can be best managed to reduce impacts on wildlife.

- Adding a green roof to new buildings.

- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#).

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.

Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles. Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.

<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>



<sup>12</sup><https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessingdevelopment-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.

Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

[Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

## Submission Details

Case Reference Number | EHDC695682542

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### Part A

**I am:** Responding as an organisation

**Name** Kate Harwood

**Address**

**Email** conservation@hertsgardenstrust.org.uk

**Telephone Number**

**Job Title / Department**

Conservation & Planning Officer

**Organisation**

Hertfordshire Gardens Trust

---

### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** Specific comment

**Please state the relevant policy or paragraph number that you are commenting on.** SASM HA2 (NHA)

**Do you wish to comment, support or object?** Support

**Please make your comment below and indicate any changes you are seeking.** The Hertfordshire Gardens Trust welcomes the inclusion in the Neighbourhood Plan of 2 historic parks/gardens not on the national Register but Locally Listed and the policy to take their heritage value into consideration when assessing proposed changes to them

## **SASM-25**

**From:** [Spatial Planning](#)  
**To:** [Development Management - Planning Policy EHC](#)  
**Subject:** [External] RE: Stanstead Abbots and St Margarets Regulation 16 Consultation  
**Date:** 13 March 2025 09:02:29  
**Attachments:** [image002.png](#)

---

Dear Planning Policy Team

Thank you for consulting Essex CC on this Neighbourhood Plan (regulation 16) consultation

This is just to conform that Essex County Council does not consider it necessary to provide comments in response to the current consultation

I trust that this provides sufficient information for current purposes Kind Regards

Rich Cooke

Principal Spatial Planner (Planning Service) Essex County Council

T: I E: I W: [www.Essex.gov.uk](http://www.Essex.gov.uk)

## **Submission Details**

**Case Reference Number** | EHDC695740080

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### **Part A**

**I am:** Responding as an individual

**Name:** Mrs Brenda Burt & Mr Roy Burt

**Address**

**Email**

**Telephone Number**

---

### **Part B**

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** Specific comment

**Please state the relevant policy or paragraph number that you are commenting on.** Policy H3 Land east of Netherfield Lane

**Do you wish to comment, support or object?** Object

**Please make your comment below and indicate any changes you are seeking.** 111. We strongly object to the use of the green belt

1V. d Green space play area unsuitable next to B181 and entrance to housing estate

1V.f Many trees and bushes have already been felled

1V. g The impact on Cats Hill and Roydon Road will cause many extra vehicles to be turning in and out of this dangerous junction. To move the junction nearer to the Armshouses will make it a real accident black spot and destroy a fine oak tree

1V. i The land behind our property is higher than our listed building and the new housing will stand out above our garden and the rear windows taking light

## Submission Details

Case Reference Number | EHDC695768469

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### Part A

I am: Responding as an individual

Name Christina Whellams

Address

Email

Telephone Number

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### Part B

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? General comment

Please state the relevant policy or paragraph number that you are commenting on. Do

you wish to comment, support or object? Support

**Please make you comment below and indicate any changes you are seeking.** The implementation of a Neighbourhood Plan, in my opinion, will help to protect our village. I recognise that development is needed and identifying suitable sites for this to happen will help us to ensure that the village remains as such and to stop coalition with the nearby town of Hoddesdon. I wholly support the sites that have been put forward and look forward to the plan being put in place.

## **Submission Details**

**Case Reference Number** | EHDC695798205

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### **Part A**

**I am:** Responding as an individual

**Name** Christine Ann Stevens

**Address**

**Email**

**Telephone Number**

---

### **Part B**

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** Specific comment

**Please state the relevant policy or paragraph number that you are commenting on.** Neighbourhood Plan P27 item E&J & P33 5.7

**Do you wish to comment, support or object?** Comment

**Please make you comment below and indicate any changes you are seeking.** P27 E&J (On the Netherfield Lane Site)- Netherfield lane is a Bridleway & I have concerns on traffic caused by the road layout of the proposed development. I believe the current plans will require revising.  
Existing Hedging & Trees Must be retained.  
P33 5.7 Again a concern on road layout & privacy of neighbors mentioned in your report.

## **SASM-29**

### **Stanstead Abbotts and St Margarets Neighbourhood Area Plan**

#### **Consultation response**

##### **Paragraph 4.27 (page 23)**

Affordable homes on the land donated to the Baesh Trust will be in addition to the 'requirement for 40% of housing on the part of the site which excludes the land with outline planning consent (3/20/0502/OUT).'

##### **SASM H3 IV (page 24) contradicts para 4.27**

b) '40% affordable housing will be required including a 6-unit housing scheme made available to the Baesh Trust.'

It should be made clear that the dwellings on the land donated to the Baesh Trust are in addition to the 40% affordable housing requirement.

##### **SASM H3 IV (page 24)**

a) Housing mix should reflect local need, with predominantly 3/4-bed homes for open market sale and smaller 1, 2 and 3 bed affordable homes.

Although there are fewer households in need for 4 bed homes than for smaller dwellings, there is a significant under provision of affordable homes for rent of this size. This results in households in need of a 4 bed home spending considerably longer on the register and often being unable to move within the area in which they currently live. It would be appreciated if the wording of this policy didn't inhibit the provision of 4 bed affordable dwellings.



**Sharon Forde**

Housing Strategy Officer

East Herts District Council

01992 531646

Sign up to our weekly newsletter - [Network](#)



## Submission Details

Case Reference Number | EHDC695976583

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### Part A

I am: Responding as an individual

Name Julia Witting

Address

Email

Telephone Number

---

### Part B

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? General comment

Please state the relevant policy or paragraph number that you are commenting on.

Do you wish to comment, support or object? Object

Please make you comment below and indicate any changes you are seeking. The site that is proposed to take the bulk of the new homes - 60 on Netherfield Lane - takes no account of the serious deficiencies that, cumulatively, make for inadequate reasons for taking land out of the Green Belt.

- Most traffic will have to flow through the High Street (a conservation residential area) in order to access the A414 westbound towards the A1, and the A10. SASM TR2 says that major development proposals should not generate an unacceptable increase in traffic volume and movements within or through the village. There is no clarity on what "unacceptable" is defined as, but 60 new homes is highly likely to add in the region of 120 new vehicles to village traffic.
- The site is at the furthest end of the village from the station and from the Co-op, which will inevitably result in increased car traffic through the High Street.



- There is a serious lack of bus services at that end of the village. The narrative (para 11.3) is misrepresenting adequacy of bus services on Roydon Road which are in reality infrequent, none run on Sundays, and in the evenings they are very limited and finish early.
- No additional community infrastructure is planned for (the primary school is a one-intake school and no additional intakes can be catered for on that site; there is no longer a GP service in the village; the dentist is not taking on NHS patients).
- That end of the village is faced with the impending impact of a new quarry adjacent to Netherfield Lane and the adjacent Gilston developments, resulting in serious, cumulative coalescence effect.
- Netherfield Lane has bridleway status only and is therefore not maintained.
- The site is located in a SSSI area. The AECOM Environmental report says: "Uncertainty is noted in relation to biodiversity and geodiversity, recognising the need to consult with Natural England and agree suitable mitigation in relation to potential impacts on Rye Meads SSSI, particularly due to increased vehicle use along the A414. It is recommended that this consultation occurs prior to plan finalisation". (Evidence page 583). The site is rich with bats.
- AECOM (evidence page 620) says that new dwellings should be contingent on upgrades to Rye Meads Wastewater Treatment Works. No such commitment has been given.
- Building in the highest risk/prevalence area for flooding in the village is sheer madness. The narrative in the plan uses the word "anecdotal" (para 8.54) and "rare" (Para 8.56) with reference to flooding. This seriously underplays the significance of a series of significant flood events that are occurring with increasing frequency since 2014 (para 8.56). This is well documented in Parish Council reports and are well known to the County Council and the Environment Agency. The evidence referenced is seriously out of date (page 17 of the evidence). There is serious underinvestment in maintenance of drainage channels by these organisations. Taking a green field that slopes down to the flood zone and replacing it with built environment is sheer madness. SASM NE4 says nothing about the risk of new homes increasing run-off and is inadequate.
- Taking out the brownfield site at Netherfield Lane is illogical when the business survey identified a shortage of available premises (para 10.8).

A much more suitable site was put forward adjacent to St Margaretsbury recreation ground (for which AECOM scoring was similar). It would have avoided most of the issues listed above that will result from building on Netherfield Lane site. The AECOM report (evidence page 599) says of Site C2: Land south of Station Road: "This is a large site within the Green Belt largely removed from the settlement boundary but connected by the north-eastern corner of the site at High Street. The site has the capacity for around 300 homes but a smaller scheme to meet local needs (at around 100 homes) could be considered. To create a more logical extension to the settlement area it may also be beneficial to include Amwell View Sports School and the open space at Site C4 (St Margaretsbury Recreation). A capped scheme at around 100 homes could also avoid development in the west of the site and reduce potential contributions to coalescence with Great Amwell."

## Submission Details

Case Reference Number | EHDC695994458

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### Part A

I am: Responding as an organisation

Name Chris Williams

Address

Email

Telephone Number Job

Title / Department Vice

Chairman Organisation

Rye House Action Group

---

### Part B

Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? General comment

Please state the relevant policy or paragraph number that you are commenting on.

Do you wish to comment, support or object? Comment

Please make your comment below and indicate any changes you are seeking. Protection of the Rye House Stadium and its Speedway track and facilities

## **SASM-32**

**From:** Matthew Lewis < >  
**Sent:** 14 March 2025 07:32  
**To:** Development Management - Planning Policy EHC  
**Cc:** Planning EE; Spatial Planning; DfT (transportplanning@dft.gov.uk)  
**Subject:** [External] NH Comments - NH/25/09815 - Stanstead Abbots & St Margarets Neighbourhood Plan - Regulation 16

Dear Planning Policy Team,

Thank you for your email dated 30<sup>th</sup> January 2025 regarding the Regulation 16 consultation for the Stanstead Abbots & St Margarets Neighbourhood Plan.

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). Our network is a critical national asset and as such, we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In relation to the Stanstead Abbots & St Margarets neighbourhood area, the closest sections of our network are M11 J7 (c. 10km), M25 J25 (c. 12km) and A1(M) J4 (c. 16km). The plan area is located close to the A10/ A414 junction, albeit neither route forms part of the SRN governed by National Highways.

We have undertaken a review of the Neighbourhood Plan, for which our interests relate to the operation and safety of the SRN. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of the proposals.

National Highways welcomes policy commitments seeking to improve access and take up of sustainable transport, particularly any policy which may off-set strategic car journeys that could otherwise travel on the SRN. We would expect for Neighbourhood Plans to comply with the National Planning Policy Framework and Guidance, and the strategic policies set by East Hertfordshire District Council.

Any proposed development should prioritise active, efficient, and sustainable transport choices. We welcome measures to reduce private car traffic generation in the first instance and the provision of sustainable transport measures. For National Highways, it is measures such as public transport enhancements i.e. bus, underground, rail or improved integration of these services that would realistically affect the number of vehicle trips that would otherwise travel on our network.

However, we recognise the continuing need for journeys on the national strategic highway network for both commercial and private purposes.

We would echo that any proposed development capable of presenting an impact on our network should be accompanied by a robust transport assessment or similar. We will consider the impact of a development proposal on our network at the time of application submission but we also welcome opportunities for early pre-application engagement.

Having reviewed the Neighbourhood Plan, we are content that there will be no specific adverse impact on the safety or efficiency of the SRN as a result of these proposals.

Please do keep us updated with any further consultation on the Neighbourhood Plan or any other relevant policy proposals by contacting us at our inbox: [PlanningEE@nationalhighways.co.uk](mailto:PlanningEE@nationalhighways.co.uk).

Kind regards,

**Matt Lewis** (he/him) Spatial Planner

Planning and Development

National Highways | Woodlands | Manton Lane | Bedford | MK41 7LW

**Tel:** 0300 470 7564

**Web:** [nationalhighways.co.uk](https://nationalhighways.co.uk)

## Submission Details

Case Reference Number | EHDC696037663

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### Part A

**I am:** Responding as an individual

**Name** Antony Combellack

**Address**

**Email**

**Telephone Number**

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### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** General comment

**Please state the relevant policy or paragraph number that you are commenting on.** Stanstead Abbotts and St Margarets Neighbourhood plan

**Do you wish to comment, support or object?** Object

**Please make you comment below and indicate any changes you are seeking.** Neighbourhood Plan consultation response 13 March 2025

The site that is proposed to take the bulk of the new homes - 60 on Netherfield Lane - takes no account of the serious deficiencies that, will impact a Green Belt area and the lives of residents in the area. Building in the highest risk/prevalence area for flooding in the village is sheer madness. 4 times in the last few years residents have had water in their homes! The narrative in the plan uses the word "anecdotal" (para 8.54) and "rare" (Para 8.56) with reference to flooding. This seriously underplays the significance of a series of significant flood events that are occurring with increasing frequency since 2014 (para 8.56). This is well documented in Parish Council reports and are well known to the County Council and the Environment Agency. The evidence referenced is seriously out of date (page 17 of the evidence). There is serious underinvestment in maintenance of drainage channels by

these organisations. Taking a green field that slopes down to the flood zone and replacing it with built environment is sheer madness and is likely to flood even more homes. The residents in the area of Netherfield Lane, Marsh Lane and Roydon Road are subjected to severe stress and fear every time there is heavy rain. This plan will only make things worse.

SASM NE4 says nothing about the risk of new homes increasing run-off and is inadequate and has probably been deliberately missed to force the plan through.

Traffic is already at very high volume through Stanstead Abbots as the A414 does not have a slip road to access it for traffic coming from Harlow through Roydon. When the train barriers are down a huge continuous flow surges through the village. 80 new homes will add a possible 120 new vehicles travelling through creating an unacceptable impact on the environment and gridlock on the High Street.

SASM TR2 says that major development proposals should not generate an unacceptable increase in traffic volume and movements within or through the village. Once again this is deliberately obscuring the reality of traffic and the impact of even more vehicles.

There is a serious lack of bus services at that end of the village. The narrative (para 11.3) is misrepresenting adequacy of bus services on Roydon Road which are in reality infrequent, none run on Sundays, and in the evenings they are very limited and finish early.

There could be as many as 100 new children added to the population of the village. No additional community infrastructure is planned for (the primary school is a one-intake school and no additional intakes can be catered for on that site; there is no longer a GP service in the village; the dentist is not taking on NHS patients).

That end of the village is faced with the impending impact of a new quarry adjacent to Netherfield Lane and the adjacent Gilston developments, resulting in serious, cumulative effect on both the environment and the lives of residents of Stanstead Abbots

Netherfield Lane has bridleway status only and is therefore not maintained.

The site is located in a SSSI area. The AECOM Environmental report says: "Uncertainty is noted in relation to biodiversity and geodiversity, recognising the need to consult with Natural England and agree suitable mitigation in relation to potential impacts on Rye Meads SSSI, particularly due to increased vehicle use along the A414. It is recommended that this consultation occurs prior to plan finalisation". (Evidence page 583). The site is rich with bats.

AECOM (evidence page 620) says that new dwellings should be contingent on upgrades to Rye Meads Wastewater Treatment Works. No such commitment has been given.

Taking out the brownfield site at Netherfield Lane is illogical when the business survey identified a shortage of available premises (para 10.8).

A much more suitable site was put forward adjacent to St Margaretsbury recreation ground (for which AECOM scoring was similar). It would have avoided most of the issues listed above that will result from building on Netherfield Lane site. The AECOM report (evidence page 599) says of Site C2: Land south of Station Road: "This is a large site within the Green Belt largely removed from the settlement boundary but connected by the north-eastern corner of the site at High Street. The site has the capacity for around 300 homes but a smaller scheme to meet local needs (at around 100 homes) could be considered. To create a more logical extension to the settlement area it may also be beneficial to include Amwell View Sports School and the open space at Site C4 (St Margaretsbury Recreation). A capped scheme at around 100 homes could also avoid development in the west of the site and reduce potential contributions to coalescence with Great Amwell."

The plan is not only flawed it is very misleading and serves only some of the proposers and not the residents in the area.

# Submission Details

Case Reference Number | EHDC696119254

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## Part A

I am: Responding as an individual

Name Cllr Joseph Dumont

Address

Email

Telephone Number

---

## Part B

Do you wish to be notified of the local planning authority’s decision to ‘make’ the neighbourhood development plan? Yes

Do you wish to make a general comment or comment on a specific policy or paragraph? General comment

Please state the relevant policy or paragraph number that you are commenting on. Whole document

Do you wish to comment, support or object? Support

**Please make you comment below and indicate any changes you are seeking.** As Ward Councillor, I am pleased to provide this response in support of the Neighbourhood Plan. I welcome the hard work that has gone into developing this document and the commitment shown by all those involved in shaping the future of our community. The Foreword to the Plan rightly highlights the importance of having a say in how our area develops. Without a Neighbourhood Plan, we would be at greater risk of speculative development. I fully agree The Plan is our opportunity to guide development in a way that respects our heritage while meeting future needs. I acknowledge that not everyone will welcome development, and I understand the concerns that residents may have. The Plan means that we can direct development towards suitable sites, rather than having it imposed upon us. There are many positive elements within this Plan, including the focus on sustainable growth, the green spaces, and the efforts to balance housing needs with maintaining the rural character of our community. The strong community engagement that has gone into this Plan should be commended. I encourage all residents to support this Plan and to vote in favour when the opportunity arises. By doing so, we take control of our own future. I urge everyone to consider the benefits of having a structured and well-thought-out approach to development and to recognise the value of having a say in the planning process. I wholeheartedly support this Neighbourhood Plan. It represents a proactive step towards ensuring that our community remains a great place to live while accommodating growth in a responsible and considered manner.

## **SASM-35**

**From:** [Plant Enquiries Team – Virgin Media](#)  
**To:** [Development Management - Planning Policy EHC](#)  
**Subject:** [External] RE: REMINDER: Stanstead Abbots and St Margarets Neighbourhood Plan Regulation 16 Consultation  
**Date:** 14 March 2025 12:03:19  
**Attachments:** [image002.png](#)

---

Hi,

If there's going to be any excavation works, please let us know the location & we can check if we have assets underground.

Many thanks, Jess  
Plant Enquiries Team – Virgin Media



### Stanstead Abbotts and St Margarets Draft Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process. It is disappointing to note that we do not appear to have been consulted previously on the plan. However, we welcome the opportunity to input into Neighbourhood Plan (NP) at Reg 16 stage to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

Our waterways should be acknowledged within the policy document, as significant blue/green infrastructure, which can serve as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the plan area.

Based on the information available we have the following comments to make:

Within the Neighbourhood Plan area, the Trust own and manage the River Lee Navigation (RLN) and River Stort Navigation (RSN). The NP area includes a section of the RLN from Bridge 60A, Lock Crossover Bridge to south of Bridge 59. The boundary of the NP area then follows the RLN to the junction with the RSN. It then follows the line of the RSN from the junction to lock 15, lower lock, with a small section of the RSN coming back into the NP area close to Roydon Station.

The waterways can be used as tools in place making and place shaping and contribute to the creation of sustainable communities. The Trust seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community.

It is encouraging that the draft NP recognises the importance of the waterway network and the role it can play in supporting sustainable communities. We also note that the Vision clearly sets out the objective to celebrate the waterways unique contribution to the area and improve important assets such as water networks. As the RLN and RSN cross and in places straddle the NP area boundaries it is important to ensure that the NP takes full consideration of and appropriately addresses issues such as this.

#### **Section 6 – Riverside**

As above, the Trust own and manage the RLN and RSN through the NP area and it will be important to ensure that the Trust are included at an early stage in any proposals, with co-ordination between the different Stakeholders in the area. To ensure this and provide some clarity the Trust should also be referenced as a key stakeholder within Para 6.1.

*Para 6.3:* The River Lee Navigation, whose industrial heritage has played a defining role in shaping a significant portion of the NP area, does not seem to have been given sufficient emphasis. It would be positive if some additional text, outlining the historical background to the Lee Navigation, perhaps distilled from the work of Jim Lewis, and the RSN could be included. This would not only help to inform an enhanced understanding of how the landscape covered by the NP has evolved but also foster an appreciation of the opportunities that the waterway corridors offer in the NP's ongoing development and implementation.

*Para 6.6:* The Hyperlink to 'The Waterways Trust' website should be updated to link instead to the Canal & River Trust website. It may also be useful to include a link to the Inland Waterways Association website.

*Para 6.4:* We recommend a number of guiding principles for waterside developments and individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. Water should not be treated as just a setting or backdrop for development but as a space and leisure and commercial resource in its own right. Waterways themselves should be the starting point for consideration of any development and use of the water and waterside land – look from the water outwards, as well as from the land to the water. The Trust would also require any development at the waterway frontage to not adversely affect the integrity of the waterway structure.

A waterway's towing path and its environs should form an integral part of the public realm in terms of both design and management. It is important that the siting, configuration and orientation of buildings optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water. It should be recognised that appropriate boundary treatment and access issues are often different for the towing path side and the offside.

Future proposals must also aim to avoid creating direct views of the developments 'back of house' from the waterways outward perspective which heavily degrades the waterways credentials as green corridors, tranquil retreats and use as treasured public amenities. Back of house elements might include car parks, service areas, such bin stores, delivery areas, sub stations etc.

Any development with a waterway frontage is also likely to include visually exposed parking arrangements in areas due to the intrinsic nature of a waterway fronting layout. It must however be recognised that vehicles can be visually buffered from the waterway's outward views through clever design and use of landscaping. This might include well placed linear hedgerows to visually buffer parked vehicles from the waterway's outward views, parking bays set between plots or within buildings, again to hide from view. Staggered bays with surrounding planting can also work to soften visual impacts.

The design requirements outlined above could be referenced within the NP to further strengthen the design considerations for development adjacent to the waterways. We would also encourage potential developers to undertake pre-application discussions with the Trust.

#### **Policy SASM R1-Riverside Development:**

Mandatory Biodiversity Net Gain (BNG) was introduced into the planning system in 2024, and the Statutory Biodiversity Metric User Guide requires that if the site boundary of a proposed development includes land within 10m of a river / canal the adjacent lengths of watercourse should be included within the watercourse baseline assessment in the Metric. As this policy specifically deals with riverside development the BNG requirements for watercourse assessment should be referenced within the policy and or supporting text.

Unless an exemption applies, developers would need to deliver a minimum 10% net gain in watercourse biodiversity units. Development may also affect other habitat types on land owned by the Trust, including, but not limited to, grassland, woodland, scrubland, and hedgerows and River Condition Assessments are required where the riparian zone could be impacted.

No works to habitat on Trust land should take place without the Trust's prior consent. Ecologists working on behalf of developers should obtain, and comply with, consents from the Trust to undertake any necessary habitat condition assessments and ecological surveys on our land, consistent with our Code of Practice.

The Trust may be able to assist in meeting Biodiversity Net Gain requirements by providing off-site biodiversity units. This would be subject to operational, management and commercial considerations but any applicants/developers seeking opportunities to secure biodiversity units on Trust land should contact [bngenquiries@canalrivertrust.org.uk](mailto:bngenquiries@canalrivertrust.org.uk).

*R1/III:* Developments should also support access along the river in the form of improved towpaths and the policy should therefore be amended as follows:

- a) *enhance existing public access to and along the riverside where improvements are feasible, in consultation with Canal & River Trust;*
- b) *: ....all major development proposals adjacent to the river shall provide public access and contribute to improving the accessibility of the towpath and access to it in consultation with the Canal & River Trust.*

*Policy SASM/ II Part d)* - seeks to support the establishment of a river bus though there is no further detail provided on this within the explanatory text so it is not clear where this service would operate to/from, or what type of service it would provide. The Trust do not appear to have been consulted on these proposals though Action Plan Appendix J seems to suggest an existing service would be extended, with provision of a quay by Lee Valley Regional Park Authority (LVRPA) and the Trust, though it is noted that LVRPA did not comment on this in their previous response.

The impacts of any river bus service on the waterway would need to be fully considered, this would include matters such as impact on structural integrity of the waterway, navigational safety, safety of all waterway users, ecology and biodiversity of the waterway.

Any such scheme would require consultation with the Trust as owner of the waterway and navigational authority. The submission of an Operating proposals via the Trust's own processes and a commercial agreement with the Trust would also be required. (<https://canalrivertrust.org.uk/business-and-trade/business-boating>)

It should be noted that the Trust would not take on any operational or maintenance responsibility for any floating structures or quays proposed to be installed within the Trust's waterways. Any such proposals would therefore also need to be supported by full details on future maintenance and management regimes and responsibilities.

Further detail on the proposals for the river bus should therefore be provided for consideration, this should include details of any feasibility studies which have been undertaken. Should no feasibility studies have been undertaken as a minimum the wording of the Policy should be amended to suggest this would be the first action.

*Policy SASM R2- Floating Structures* : This policy is titled ‘Floating Structures’ though it covers both moorings and floating structures. It is considered that the title of the policy needs review. It is also not clear what is meant by ‘floating structures’ and further clarity on this should be provided for consideration.

The impact on any floating structures on the structural integrity of the waterway, navigational safety, safety of all waterway users, ecology and biodiversity, and character, appearance and heritage of the waterway would also be key considerations and should be referenced within the policy and / or supporting text. Any structures within the Trust’s waterways would also need our separate approval as landowner and would be subject to commercial agreements.

The draft NP acknowledges the increasing demand from those seeking to live on a boat and more people seeking alternative types of housing accommodation are finding living on a canal boat a viable option. The text in the Policy SASM R2 relating to moorings includes the following:

*‘Any provider of permanent moorings will be expected to provide a parking space, refuse and recycling facilities, and utilities infrastructure, as part of any application.’*

The Trust views permanent moorings as including leisure, residential and trade moorings. Whilst there is no reference to ‘residential’ in the draft policy, it appears to provide general support for ‘permanent moorings’. However, no definition of ‘permanent moorings’ is included in the draft plan, so it is not clear what is considered to be ‘permanent moorings’. In this regard, adding a definition of ‘permanent moorings’ in the NP might assist with clarity. Any increase in moorings would also need to consider impacts on the navigational channel, and dip surveys and dredging may be required to ensure a sufficient navigational channel is maintained.

### Section 7 - Heritage Assets

As above, the industrial heritage of the River Lee Navigation has played a defining role in shaping a significant portion of the NP Area, and this could be given greater emphasis within the NP, with additional text, outlining the historical background to the RLN, perhaps distilled from the work of Jim Lewis. This would not only help to inform an enhanced understanding of how the landscape covered by the NP has evolved but also foster an appreciation of the opportunities that the waterway corridor offers in the NPs ongoing development and implementation. The LVRPA also seem to have referred to the wider heritage of the RLN in their response to the Reg 14 consultation, though this doesn’t seem to have been transferred into this version of the plan.

The inclusion within Policy SASM HA4 of protected views along the RLN upstream and downstream from Bridge 59A, Stanstead, Abbots Road (nos.9&10) is positive, although reference to boats as a contributor to the view would be welcomed.

### Section 8 – Natural Environment

*Policy SASM NE1- Local Green Space (LGS)*: the policy identifies areas of LGS, and these are shown on the policies plan, though the scale of the plans means it is difficult to determine the exact extent of these proposed designations. It should be ensured that any designations do not extend over the waterway corridor, towpath or the Trust’s land interests and clearer plans should be provided to demonstrate this.

It should also be noted that the Trust have a statutory obligation to operate and maintain our infrastructure, such as the navigation and towpath, to an adequate standard for our customers (including boaters and towpath users), and it should be acknowledged within the NP that the Trust’s ability to meet these statutory obligations will not be inhibited.

As per our comments above, Mandatory Biodiversity Net Gain (BNG) was introduced into the planning system in 2024, and the Statutory Biodiversity Metric User Guide requires that if the site boundary of a proposed development includes land within 10m of a river / canal the adjacent lengths of watercourse should be included within the watercourse baseline assessment in the Metric. The BNG requirements for watercourse assessments should be clearly referenced and the BNG related paragraphs 8.44 and 8.45 updated accordingly.

### Section 9 – Leisure and Community Facilities

*Policy SASM CL2- New leisure facilities*: this policy states that new facilities which promote and / or enhance active use of the river and river paths will be supported, such as a quay to take on or disembark passengers from a river-bus.

For clarity it would be beneficial if the wording could be amended to include specific reference to towpaths: ‘...active use of the river, ~~and~~ river paths and towpaths...’

As per our comments elsewhere in this response, any proposals for a river bus, quay or associated development would require consultation with the Trust and would be subject to our own separate processes and commercial agreements and this should be referenced within the NP.

### Section 10 – Business and employment

Stanstead marina is owned by the Trust and any development of a marina or works would have to be done in conjunction with the Trust and the rights granted within the lease. The policy wording should be amended as follows and it should be clear that consultation with the Trust is required for both a) & b) within Part II of this policy:

*' in partnership with the Canal and Rivers Trust'*

The policy refers to '*water taxi*' though it is not clear if this is the same as the '*river bus*' referenced elsewhere in the NP. Clarity on this should be provided, though our earlier comments on the issues and consideration around the provision of a river bus, any associated infrastructure, future maintenance/management and requirement for commercial agreements with the Trust would also be relevant to this section.

#### Section 11 – Transport

*Policy SASM TR1 Safe and Sustainable Transport parts I and II*; the reference to "PROWs" should not be limited to PROWs but include/provide/enhance walking and cycling infrastructure more generally, and could go further to require development to enhance and extend the existing network of walking and cycling routes, and to include the towpaths on the RLN, RSN and other waterways as needed, with a view to access to recreational and green space as well as more general transport. LVRPA also suggest this in their consultation response (p102), though this does not appear to have been incorporated into the NP.

There is no reference to the towpath of the RSN near Roydon Station. This should be referenced specifically to ensure it isn't forgotten entirely with respect to potential towpath improvements that could be supported by development near the station.

The Trust would also support the comments from the LVRPA in their response to the Reg 14 consultation on "Transport" and safe crossing points at key connections with towpath/Lee Valley Park access. The LVRPA also highlighted they would seek S106 from developments impacting on the LVRP and this source of funding should be written into the delivery plan.

#### Appendix J-Action plan

In the Action Plan a sum of £2,000 is put forward towards the following: Objective: '*Make paths and the towpath more attractive*' (C2) The actions here state, '*Work with District and Parish Councils .....*'. The Trust should also be consulted on any proposals as we will want to ensure any proposals are appropriate and no additional structures are placed on Trust land without our consent and with details of future maintenance/management regimes and responsibilities clearly outlined. It should be noted that the Trust would not take on the ownership or management of any new structures or bins.

*T7 – River bus*: As per our comments elsewhere in this response, the impacts of any river bus service on the waterway would need to be fully considered, this would include matters such as impact on structural integrity of the waterway, navigational safety, safety of all waterway users, ecology and biodiversity of the waterway.

Any such scheme would also require consultation with the Trust as owner of the waterway and navigational authority. The submission of an Operating proposals via the Trust's own processes and a commercial agreement with the Trust would also be required. (<https://canalrivertrust.org.uk/business-and-trade/business-boating>)

It should be noted that the Trust would not take on any operational or maintenance responsibility for any river bus service, floating structures, quays or other required infrastructure. Any such proposals would therefore need to be supported by full details on future maintenance and management regimes and responsibilities.

The above comments do not prejudice any further matters that might be raised at a later stage as the plan/document emerges.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Anne Denby MRTPI Area  
Planner

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

## **SASM-37**

**From:**  
**Sent:** 14 March 2025 14:45  
**To:** Development Management - Planning Policy EHC  
**Subject:** [External] Stansted Abbott's Neighbourhood Draft Plan

The Roydon

Society, March

2025

Dear Sir/Madam

Stansted Abbott's Neighbourhood Draft Plan

Comment 1. There is reference, within the Plan, to the A414 slip road exit onto the B181, adjacent to Stanstedbury, having insufficient site line for those exiting the slip road onto the B181 and like wise, those travelling towards Roydon not having clear sight of traffic exiting the slip road. It is hoped that with additional traffic , from planned additional development, that improvements will be undertaken to this exit.

Comment 2. Although East Herts recommended the production of the Neighbourhood Plan to clarify sites where additional houses requested should be located, it should be noted that East Herts Call for Sites (CforS) put forward have not been taken into account due to the CforS document not being published until after the Neighbourhood Plan consultation has been published. If the CforS document relating to Stansted Abbots suggested sites are taken into account, this could increase the numbers of properties being built considerably, without any support infrastructure.

It is suggested that the Neighbourhood Plan decision is delayed until the Call for Sites suggested sites for Stansted Abbott's are finalised.

Comment 3. The B181 verges are currently being thoroughly trashed by those motorists from East Herts using this road as a 'rat run' to avoid the works for HGGT at Eastwick thro to Harlow. Should the numbers of housing increase in Stansted Abbots, Hertfordshire Highways must factor into the finances, regular maintenance of this road.

Please take these comments into account.

Many thanks

Yours faithfully

S Wilkinson (Hon Sec The Roydon Society)

## Submission Details

Case Reference Number | EHDC696255498

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### Part A

**I am:** Responding as an organisation

**Name** Michael Priaulx

**Address**

**Email** swifts.planning@gmail.com

**Telephone Number**

**Job Title / Department**

Chair

**Organisation**

Swifts Local Network: Swifts & Planning Group

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### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** General comment

**Please state the relevant policy or paragraph number that you are commenting on.** Biodiversity

**Do you wish to comment, support or object?** Comment

**Please make you comment below and indicate any changes you are seeking.** The biodiversity references are too general and do not refer to Swift Bricks to align with NPPF December 2024 and NPPG 2019 Natural Environment paragraph 023. Please update as per advice submitted by local Swifts Group representative.

Dear East Herts Council Planning Policy Team,

**Consultation on Stanstead Abbots and St Margarets Neighbourhood Area Plan Regulation 16**

Thank you for consulting the Minerals and Waste Planning Authority on the Stanstead Abbots and St Margarets Neighbourhood Area Plan Regulation 16.

Comments to the Regulation 14 consultation were provided in March 2023 and are still applicable to the Neighbourhood Plan area.

In our previous response as the Minerals and Waste Planning Authority, it was stated that the Neighbourhood Plan should have regard to the adopted Minerals and Waste Local Plan documents, as these form part of the Development Plan for the area.

Paragraphs 1.6 and 2.6 of the Regulation 16 Plan refer to the emerging (draft) Minerals and Waste Plan 2040. Whilst this acknowledgement is welcomed, the county council, as the Minerals and Waste Planning Authority, would request that all the adopted Minerals and Waste Local Plan documents are referenced within the Plan. For reference, the adopted Minerals and Waste Local Plan documents are as follows:

- *Minerals Local Plan Review 2007*
- *Waste Core Strategy and Development Management Policies Development Plan Document (DPD) 2012*
- *Waste Site Allocations DPD 2014*

As the emerging Minerals and Waste Plan has not been adopted yet, the adopted Minerals and Waste Local Plan documents listed above still currently form part of the Development Plan for Hertfordshire. Please note that an updated Minerals and Waste Development Scheme will be uploaded to the county council's website in the future which will detail an updated timeline for the emerging plan documents and their future adoption.

Paragraphs 1.15 and 2.6 of the Neighbourhood Plan refer to MAS01: The Briggens Estate, which is proposed as an allocated mineral site in the emerging Minerals and Waste Local Plan for sand and gravel extraction.

Paragraph 2.6 states that there is '*concern regarding the routing of the sand and gravel lorries away from the [Briggens] site as there is no west bound slip road onto the A414*'.

The Draft Minerals and Waste Local Plan (July 2022) addresses these concerns in full, through the Site-Specific Requirements for the Briggens site contained within Policy 2, as well as the Site Brief for Briggens at Appendix 1 of the Plan.

In addition to this, the Policy Evidence Reports for the emerging Minerals and Waste Local Plan – Post Regulation 18 (2024), which are available at [hertfordshire.gov.uk/mwlp](https://hertfordshire.gov.uk/mwlp), include the report titled "PS-EVR-2 Meeting Sand and Gravel Needs (Mar 2024)". This report addresses the main concerns which were raised during the Regulation 18 consultation relating to MAS01: The Briggens Estate, including those around traffic issues, at paragraph 4.6.

Criterion m) of that report addresses issues to do with traffic and congestion on local roads. The county council's response to these issues is detailed on page 14 of the report, where it is stated that the site has been assessed by the Highways Authority who raised no concerns.

In addition to this, PS-EVR-A1 Site Briefs (Jan 2024) also addresses common concerns which were raised during the Regulation 18 consultation relating to the Briggens site.

On pages 9 and 10 of this document, the council's response to the main issues raised around MAS01: The Briggens Estate, are detailed. Criterion c) states that:

*'[...] Site traffic will exit the site onto the B181 and travel to the A414, this is supported by the Highways Authority.'*

Criterion d) states that:

*'The site brief and Policy 2 specify that traffic must not travel through Stanstead Abbots', and that the brief 'accounts for vehicles heading west via, for example, a potential reopening of the west facing slip roads. The policy must remain flexible to allow for a potential range of options. The Highways Authority raised no objections to the Site Brief.'*

Here it is evident that the concerns around the routing of sand and gravel lorries away from Briggens through Stanstead Abbots should be allayed, and the fact that the Highways Authority raised no objections to the Site Brief, which can be found within Appendix 1 of the Minerals and Waste Local Plan Draft Plan (July 2022), confirms that the site should have no negative traffic / amenity issues for the residents of nearby parishes such as Stanstead Abbots.

Paragraph 1.15 of the Neighbourhood Plan states that *'There is much opposition to this [the allocation of the Briggens Estate in the emerging Minerals and Waste Local Plan] from residents because of the impact on the landscape and the openness of the Green Belt'*.

In the evidence report PS-EVR-2, similar issues were also highlighted during the Regulation 18 representation stage, with concern of Green Belt removal highlighted in criterion f) of paragraph 4.6. The council's response to the concern at criterion f) was that *'The greenbelt is not being removed, it will be temporarily worked and restored. It will not constitute a continuous urban extension.'* This can be viewed on page 13 of PS-EVR-2.

In the evidence report PS-EVR-A1, the county council's response to the main issues raised surrounding the Briggens Estate are listed. Within these comments, the county council refers to the Site Brief, which can be found within Appendix 1 of the Minerals and Waste Local Plan Draft Plan (July 2022), which specifically mentions the provision of open space and enhanced connectivity at the site, as well as the fact that Minerals extraction is temporary development, and therefore the status of the greenbelt will not change. The final restoration scheme for the Briggens Estate will need to be agreed in the future and any timetable for extraction and restoration will be determined at planning application stage and conditioned as appropriate.

Yours sincerely, Finlay

Banks

Planning Officer- Minerals and Waste Policy.



## Submission Details

Case Reference Number | EHDC696264144

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### Part A

**I am:** Responding as an individual

**Name** William Brown

**Address**

**Email**

**Telephone Number**

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### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** Specific comment

**Please state the relevant policy or paragraph number that you are commenting on.** 4.27 - Baesh Almshouses

**Do you wish to comment, support or object?** Support

**Please make you comment below and indicate any changes you are seeking.** This is a very important part of the proposed plan which I support. By including provision for the donation of land to the Baesh Trust the cost of the development is borne by the Trust, and there is an absolute certainty of the delivery and ongoing management of truly affordable accommodation for qualifying people, which includes from the parish of Great Amwell. There is no such certainty where commercial development is done.

## Submission Details

Case Reference Number | EHDC696268697

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### Part A

**I am:** Responding as an individual

**Name** William Brown

**Address**

**Email**

**Telephone Number**

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### Part B

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** Specific comment

**Please state the relevant policy or paragraph number that you are commenting on.** 4.28 - Housing needs

**Do you wish to comment, support or object?** Comment

**Please make your comment below and indicate any changes you are seeking.** The housing needs analysis from EHDC is correct, identifying that the largest need is for smaller (2-3 bed) family homes. While local estate agents truthfully report the demand for purchase of 3 and 4 bed homes, this overlooks the hidden households that were identified in the 2021 census data.

There are in the plan area (and surrounding villages) substantial numbers of 4-5 bedroom homes with severe under occupation (the children having grown up and 'fled the nest'). The occupants in many cases would downsize if suitable market rate smaller housing was available, designed to Lifetime Homes Standards. That in turn would free up those larger homes to meet the demand that the estate agents see.

## **\_Submission Details**

Case Reference Number | EHDC696271528

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### **Part A**

**I am:** Responding as an individual

**Name** William Brown

**Addres**

**s Email**

**Telephone Number**

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### **Part B**

**Do you wish to be notified of the local planning authority's decision to 'make' the neighbourhood development plan?** Yes

**Do you wish to make a general comment or comment on a specific policy or paragraph?** Specific comment

**Please state the relevant policy or paragraph number that you are commenting on.** SASM H3 Land East of Netherfield Lane/South of Roydon Road

**Do you wish to comment, support or object?** Comment

**Please make you comment below and indicate any changes you are seeking.** The mix of housing that is defined in section IV (a) is not quite correct as it it does not follow the Housing Needs analysis from EHDC reported at section 4.28, which is that the demand is for 2 and 3 bedroom homes - not 4 bedroom homes as included in the policy.

This overlooks the hidden households that were identified in the 2021 census data, and the substantial numbers of existing 4-5 bedroom homes with severe under occupation (the children having grown up and 'fled the nest'). The occupants in many cases would downsize if suitable market rate smaller housing was available, designed to Lifetime Homes Standards. That in turn would free up those larger homes to meet the demand that the estate agents see, and provide a much better balance of housing supply. It is a mistake to only regard the supply as the exact new homes constructed; it is essential to include in the calculation the effect of enabling downsizing in releasing larger family properties to the market.

That does not of course address the need for Affordable Housing or market affordable housing; I fully support the requirement that 40% of the 60 homes in Site H3 are affordable. There is a shortage of housing for key workers who are essential to the local economy, and to enable other low-income households to live locally.

I propose that secton SASM H3 IV (a) is changed to read: "Housing mix should reflect local need, with predominantly 2/3-bed homes for open market sale, and additionally 1, 2 and 3 bed affordable homes."

**Public Consultation Regulation 16**

**Stanstead Abbots and St Margarets Draft Neighbourhood Plan 2017 - 2033**

As neighbours, Hunsdon Parish Council, is aware that planning and development policies in the draft plan may impact on us. We have identified some points for consideration when refining the draft plan.

**Hertfordshire Minerals & Waste Local Plan 2040 (draft July 2022)**

Paragraph 2.6 referring to the proposal in the HCC Draft Plan to extract sand and gravel from the Briggens Estate site (Olives Farm) acknowledges that it is:-

*‘very likely’ that there will be a quarry on the estate resulting in continuous extraction of sand and gravel for a period of 25 years’.*

Hunsdon PC is not aware that Stanstead Abbots PC has changed its opposition to the Minerals Plan proposals. We suggest that the text is edited to remove the assumption about the development of the quarry.

Also: -

*‘The entrance to the quarry would be on the B181 between the edge of Stanstead Abbots and the link road – Easterly direction – onto the A414. This leads to concern regarding the routing of the sand and gravel lorries away from the site as there is no west bound slip road onto the A414’.*

We suggest that it is made clear that as there are no west facing slip roads onto the A414, access and egress from and to the west to the quarry site would have to be via B181 through the village centre or Roydon or via B180 through Hunsdon to the A414. Obviously all three communities are going to be alarmed at this risk but it needs to be spelt out in the NP.

We think that **Policy TR2 Traffic Impact of Major Development** needs to be strengthened having the possible quarry development in mind to specifically cover the B180 and B181 in adjoining parishes. Also ‘unacceptable increase’ needs to be specific to classes of vehicles, restricting movements in actual terms rather than percentages.

No views across Olives Farm have been identified which is disappointing. The view across Olives Farm from the A414, an open landscape with farmland and woodland, is most impressive and this would be completely destroyed by sand and gravel extraction.

We suggest you include this.

The Parish Council hopes you find these comments useful.

Clerk etc HPC

To whom it may concern,

**Stanstead Abbots and St Margarets Neighbourhood Plan - Regulation 16  
Consultation**



Thank you for the opportunity to comment on the above consultation. This letter relates to the services of the Environment & Infrastructure Department, which also incorporates other services provided by the county council where relevant. The comments within this letter reflect the interests of the following services provided by the county council:

- Highways and Transport
- Lead Local Flood Authority

**Highways and transport**

**Detailed comments**

*Objective Q: 'To implement traffic calming measures where possible that will protect the High Street and surrounding roads as well as ensuring safe and sustainable travel options to local school/nurseries and place of work'*

HCC would recommend that this objective is reframed around achieving reduced vehicle speeds, rather than focussing on a particular solution, given this raises expectations for which HCC will be responsible for as highway authority. Equally, it should be recognised HCC has set guidelines on the implementation of traffic calming measures and speed limits in our Speed Management Strategy - it may not be appropriate for this approach to be implemented in all situations.

*Objective R: 'To promote parking provision in accordance with East Herts District Council parking standards'*

As per our comments on Policy TR2 and TR3 (below), this does not accord with the way in which HCC approach development, or indeed our Transport User Hierarchy which prioritises sustainable travel first (Policy 1 of LTP4), or set against the concerns of congestion, vehicle speed and air quality set out in Paragraphs 11.4 onwards. HCC would suggest that significant increases in vehicular parking are likely to exacerbate all of these issues, rather than address them.

**Policy TR1, Safe and Sustainable Transport**

HCC broadly agree with the objectives of this policy, however we would consider that a helpful addition would be to consider access to public transport, particularly as there are both rail and bus services serving Stanstead Abbots (the former via St Margarets station).

**Policy TR2, Traffic Impact of New Development**

HCC appreciate the concerns relating to congestion raised in the NP, and in this policy, however this does not accord with HCC's LTP4 and the way in which HCC approach development - developments should instead be viewed from their alignment to LTP4 (prioritising and promoting sustainable travel) rather than demonstrating their credentials in terms of vehicular capacity and movement. HCC would therefore suggest this policy is reframed or removed.

### Policy TR3, Parking Standards

As per our comments on Policy TR2, this does not accord with the way in which HCC approach development, or indeed our Transport User Hierarchy which prioritises sustainable travel first (Policy 1 of LTP4), or set against the concerns of congestion, vehicle speed and air quality set out in Paragraphs 11.4 onwards. HCC would suggest that significant increases in vehicular parking are likely to exacerbate all of these issues, rather than address them.

### Paragraph 11.15, South Eastern Growth and Transport Plan

HCC would suggest this paragraph is revisited, since the South Eastern Growth & Transport Plan has now been adopted (as of July 2022). The impact of this document on Stanstead Abbots should also be considered.

### Paragraph 11.16, Electric Vehicle Charging Points

It should be recognised that the implementation of electric vehicle charging points should be in accordance with our emerging Electric Vehicle Charging Strategy.

## **Lead Local Flood Authority**

### **General comments**

The LLFA are pleased to see that flood risk is referred to throughout the document, acknowledging the location within the natural floodplain of the Lea Valley and the areas of Flood Zone 2 and 3 that may constrain development.

Regarding development in Flood Zone 2 or 3, a sequential test should be carried out for each site to determine if there are suitable alternative locations for development. A flood risk sequential test is likely to be required for any sites where built development (including land raising) or access/egress points are proposed in areas at risk of flooding from any source. Please see paragraph 175 of the NPPF.

Equally the LLFA are pleased to see that some of the plans objectives including I, J and K of Housing & Design include ensuring new developments are resilient to flooding, will provide biodiversity net gain and will increase amenity value in open spaces.

SuDS are required on all sites to provide water quantity, water quality, biodiversity and amenity benefits. These are known as the four pillars of SuDS. The below will apply to all sites.

SuDS features include structures such as attenuation basins/pond, blue-green roofs, swales, permeable paving and rain gardens, which can be used to capture, attenuate and slowly release surface water in order to reduce pressure on local drainage infrastructure.

SuDS should be included in all developments, preferably above-ground, to capture, attenuate and regulate the flow of water, averting the potential impact of increased impermeable surfacing. In doing so, developments should not increase flood risk and may even provide flood risk betterment. Furthermore, the use of SuDS can improve the water quality of run off that may eventually be discharged to natural assets such as rivers or ordinary watercourses. This is particularly important when draining surfaces that may contain contaminants, such as roads or car parks.

The key principles of SuDS that must be considered for all developments include

- Discharge at greenfield runoff rates and volumes
- Discharge to a suitable location in accordance with the discharge hierarchy:

- o Rainwater harvesting/re-use
  - o Infiltration
  - o Main river/ordinary watercourse
  - o Public surface water sewer
- Robust technical information must be provided to discount discharge mechanisms higher in the hierarchy than the one that is proposed. Relevant third-party agreements from landowners or Water and Sewerage Companies will also be required .
  - SuDS options considered in accordance with the SuDS hierarchy, which greatly favours above-ground options such as ponds or basins over below-ground features like attenuation tanks. All sites must use SuDS to deliver water quantity, quality, biodiversity and amenity benefits.

A source control approach whereby SuDS features and surface water attenuation are distributed around the site should be prioritised, instead of traditional "pipe to basin" solution where the vast majority of surface water storage is provided in a single large structure.

It may be advisable to raise finished floor levels so that flood resilience is built into all new developments. If there is existing flood risk on the site, finished floor levels should be set a minimum of 300mm above the flood levels.

All development proposals should be supported by appropriate information including but not limited to Flood Risk Assessments and Drainage Strategies, ground investigations including infiltration testing and identification of local groundwater levels and provision of third-party agreements where relevant. Further information can be found on our website (link below)

All developments should comply with local and national design SuDS guidance such as HCC's LFRMS2, the national non-statutory technical standards and so on. Further information is available here <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/flooding-in-hertfordshire.aspx>

The LLFA has identified Stanstead Abbots and St Margarets, as well as Great Amwell and Hailey nearby as surface water flood risk hotspots. These are areas that have a locally increased risk of flooding from surface water, as identified in our Surface Water Management Plans. As the Neighbourhood Plan identifies, a large area of Stanstead Abbots and St Margarets is in Flood Zone 2 and 3 with existing flood defences, which must be maintained.

We would also take the opportunity to discuss paragraph 8.57 of the Plan, which states

"The major threat of flooding comes from poorly maintained and/or inadequate surface water drainage. It is the responsibility of the lead local flood authority to carry out flood risk assessments from surface water in the event of development"

We would suggest that this paragraph is re-worded as currently it is not accurate. The LLFA is not responsible for carrying out flood risk assessments from surface water in the event of development. The LLFA is a statutory consultee on major planning applications, meaning the Local Planning Authority (LPA), who in this case is East Hertfordshire District Council, is required to consult us on major developments. Our role is then to advise the LPA to ensure new developments propose sustainable and appropriate drainage for the site, as above. The LPA will then take the LLFA's comments into consideration as part of the planning balance when determining the application.

### **Site-specific comments**

We have provided comments below on each of the allocated sites.

H3 - Land to the east of Netherfield Lane, Stanstead Abbots, SG12 8HE

We understand this is a partially brownfield site of 3.2ha, with an estimated capacity of 60 units.

This site is generally modelled to be at low risk of surface water flooding and is not in Flood Zone 2 or 3. The site contains a small area of medium-high flood risk on the western boundary with Netherfield Lane that will need to be considered in any drainage designs.

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.

As a former factory, a ground investigation should be undertaken at the initial planning stage to identify any sources of contamination. As such we would expect any future Flood Risk Assessment to consider the risk of surface and groundwater contamination resulting from the use history of the site. Contamination testing should be conducted as part of the ground investigations to identify any potential sources of contamination such as made ground. If contamination is identified, remediation should take place to ensure surface and ground water do not become contaminated because of the development. SuDS features may need to be lined to ensure this.

#### H6 - Chapelfields and Abbotts Way Garages, SG12 8HZ and 8HT

We understand this is a brownfield site of 0.18ha with an estimated capacity of 7 units.

As the site is allocated to provide 7 units, this is likely to qualify as a non-major planning application in which case the LLFA may not be consulted.

The area of this site north of Abbotts Way is currently included in a pending Section 19 Flood Investigation, following multiple reports of internal property flooding. As such, discharge rates from this site must be restricted to greenfield rates and volumes and measures in place to ensure no surface water runoff generated on the site flows off site. We also have multiple reports of internal property flooding to the north on Cappell Lane.

All developments should comply with local and national design SuDS guidance such as HCC's LFRMS2, the national non-statutory technical standards and so on. Further information is available here <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/flooding-in-hertfordshire.aspx>

Yours sincerely,

Jamie Glazebrook

Senior Planning Officer, Growth & Infrastructure Unit



## **SASM-45**



It's everyone's water

Dear Sir/Madam,

For your information an assessment has been undertaken of the sewerage infrastructure capacity for the proposed allocations within the document. A copy is attached. The text in paragraphs 8.40 and 8.41 is supported.

Kind regards,

**Chris Colloff**

Planner – Thames Water

1<sup>st</sup> Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1

8DB Working schedule: Monday to Thursday

Site ID	Site Name	STW Catchment	Waste Network RAG Assessment	STW RAG Assessment	Additional Comments
53393	H3 Land to the east of Netherfield Lane, Stanstead Abbots	Rye Meads			
74439	H6 Chapelfields and Abbots Way, Stanstead Abbots	Rye Meads			

## **SASM-46**

**From:** Plant Enquiries Team <PlantEnquiriesTeam@virginmedia.co.uk>  
**Sent:** Thursday, 30 January 2025 13:11  
**To:** Development Management - Planning Policy EHC  
**Subject:** [External] FW: Stanstead Abbotts and St Margarets Regulation 16 Consultation  
**Attachments:** Publication Notice.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi,

Thank you for the below information. If/when construction works are taking place, please contact us here to obtain area specific Virgin Media asset plans to ensure safe digging practises. We may also need to obtain a wayleave or divert our services. All of which can be coordinated through this mailbox.

Many thanks,

Jess

Jessica Parkes | Statutory and Streetworks Team Manager  
Mobile –  
Communications House,1 Chippingham Street, S9 3SE

## **SASM-47**

Dear Laura,

Re: EA Representation- Stanstead Abbots & St Margarets Neighbourhood Plan- Regulation 16

I hope this finds you well and apologies for the delay in this response.

As discussed over the phone yesterday, I can now confirm that we **do not have any further comments** to our representation to the Regulation 14 consultation, dated 26 June 2024 (attached).

This is because there have not been any changes/updates relevant to our remit since the last time we commented on the said draft plan.

I have attached the following for your reference:

1. Environment Agency's response to the regulation 14 consultation.
2. Environment Agency's Neighbourhood Plan Advice Note – this is our standing advice for neighbourhood plans and may be useful for this and/or future neighbourhood plans (recommended for use at early stages of plan-making).

I hope the above makes sense. Should you have any questions, please feel free to get in touch. Many

thanks,

**Mohammad Ahmed** (Licentiate RTPI, MSc., BSc.(Hons))

Planning Specialist, Hertfordshire & North London Sustainable Places

**Environment Agency** | Alchemy, Bessemer Road, Welwyn Garden City, Hertfordshire, AL7 1HE