

Summary Document of Representations:

This Document provides a summary of representations received during the Regulation 16 consultation on the Stanstead Abbots and St Margarets Neighbourhood Development Plan. All comments received during the consultation have been sent to the Independent Examiner in their entirety.

Organisation	Summary of Comments
<p>SASM-1 C MacCullagh (East Herts District Council)</p>	<p>Comments:</p> <p>Correct the incorrect reference to the District Plan for context and ensure correct terminology and links are included when referring to heritage assets.</p> <p>Warrax House:</p> <p>Warrax House is not included on our Draft Local List of Historic Parks and Gardens. Confusingly, the policy map for the draft NP does not properly include Warrax House. The Conservation Area Appraisal does include some of the ground of Warrax House as open space to be protected.</p> <p>There is reference in the NP to:</p> <ol style="list-style-type: none"> 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. <p>Can't find these documents anywhere, which should be resolved before NP is adopted.</p>
<p>SASM-2 G Knight</p>	<p>Several comments:</p> <p>Appendix J Action Plan:</p> <p>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</p>

	<p>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 refers to.</p> <p>Policy NE2:</p> <ul style="list-style-type: none"> • 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 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. • At part IV the phrase "could include" really ought to be amended to "should include" in order that the items mentioned are carried out on developments. • Should make specific reference to the provision of Swift bricks on new developments (NPPF mentions Swifts and planning policies at paragraph 187). Swifts nest in Stanstead Abbots, including a colony on the buildings at the Maltings, however they have declined by over 60% in the last 30 years due to 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. 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.
SASM-3 K Fletcher	<p>Support with comment:</p> <p>The plan is very thorough and has considered the impact of future development from every perspective of village life.</p> <p>I personally would have liked more definite requirements regarding traffic calming and public transport improvement but accept that the plan probably goes as far as powers allow in this regard.</p> <p>The Parish Council should be commended for the time and dedication to produce the plan and future proof our community.</p>

SASM-4 J Topping	<p>Comments:</p> <p>I run Ware Swifts and have read and agree with the comments made by G Knight of Sawbridgeworth Swifts (SASM-2).</p> <p>Additionally, Point E1 on Page 120:</p> <ul style="list-style-type: none"> Says the priority is low regarding the objective to reduce light pollution - it is now thought that light pollution is affecting plants and 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.
SASM-5 S Lear	<p>Support:</p> <p>I strongly support the plan.</p>
SASM-6 R Lear	<p>Support:</p> <p>I strongly support the plan.</p>
SASM-7 R Hunt	<p>Support:</p> <p>This is a well-thought-out plan which meets the need for affordable housing, takes into account the concerns of local people, protects the villages from excessive development, and preserves the character of the communities.</p>
SASM-8 Sport England	<p>Comments:</p> <p>Sport England does not reference specific elements of the SASM plan, but gives various general comments and offers guidance:</p> <ul style="list-style-type: none"> In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance, 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. It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with reference to Pars 103 and 104. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays

	<p>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.</p>
<p>SASM-9 North East Hertfordshire Swift Group</p>	<p>Comment:</p> <p>Policy NE2:</p> <ul style="list-style-type: none"> • Could this policy be amended to require swift bricks in all new housing, in the interest of biodiversity. Swifts nest in Stanstead Abbots as per the RSPB Swiftmapper – supplementing opportunities for them would be very beneficial. • Swifts are red listed birds and swift bricks are a valuable conservation tool that should be used to help reverse their decline. • Swift bricks last the lifetime of the building and are inconspicuous, simple and inexpensive while not requiring ongoing maintenance. • Presence of swifts likely to go largely unnoticed by residents.
<p>SASM-10 Great Amwell Parish Council</p>	<p>Support:</p> <ul style="list-style-type: none"> • Great Amwell Parish Council welcomes the proposals within the plan, covering part of the Great Amwell parish. The Parish council acknowledges the difficulties experienced by authorities in meeting housing provision required under the overarching District Plan. • The Parish Council fully supports the proposed development areas as they avoid settlement coalescence and present a sustainable housing development approach. • The Parish Council acknowledges and is grateful for the work of volunteers who helped take the Neighbourhood Plan forward to consultation.
<p>SASM-11 T Meehan</p>	<p>Comment:</p> <p>SASM H3 (Land East of Netherfield Lane / South of Roydon Road – point III):</p> <p>There has been 3 versions / iterations of plans for redevelopment of land east of Netherfield Lane. The first was to use only part of the field, the second shows natural habitat area at rear of 91-93 Roydon Rd, and the third this area was changed to a car park.</p> <p>Car park directly at the rear of our Grade II listed property and is a disappointing security / heritage concern. Point III states: “there should</p>

	<p>be no greater land-take of greenfield land than is necessary to deliver the development” – question as to whether this is being adhered to. Unnecessary removal of natural habitat area.</p> <p>In overall agreement with the NP and understand housing need – but concerned about third iteration of SASM H3 plan. Issue raised with Websters who said they would look into alternative parking locations.</p>
<p>SASM-12 P Webster (Maple Planning – on behalf of client Webster Estates Ltd)</p>	<p>Support:</p> <p>Writing in support of the NP on behalf of Webster Estates Ltd (WEL). WEL own the SASM H3 – Land East of Netherfield Lane / South of Roydon Road site and have engaged with NP stakeholders during its preparation.</p> <p>NP has been carefully prepared to respond to needs of Parishes & balance local environmental sensitivities and infrastructure requirements. Reference to Paragraphs 15, 36, and 37 of NPPF to support allocation of SASM H3.</p> <p>Gives overview of SASM H3 including a site description, review of planning history & the site allocation – explains that re Paragraph 143 of NPPF, greenfield part of the site performs no greenbelt function.</p> <p>WEL commend the NP as a plan which is positively prepared, justified, effective, and consistent with national policy.</p>
<p>SASM-13 B Theobald</p>	<p>Support:</p> <p>SASM H3 – Land East of Netherfield Lane / South of Roydon Road:</p> <p>Household fully supports development on green & brownfield sites on Netherfield Lane (Websters). Currently an eyesore and attracts worrying attention. Sooner the development the better and proposed plans look great.</p>
<p>SASM-14 Property Planning Team, Hertfordshire County Council</p>	<p>No comment:</p> <p>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.</p>
<p>SASM-15 N Cox</p>	<p>Comment:</p> <p>The neighbourhood plan experience proves that planning by algorithm is a very blunt instrument.</p> <ul style="list-style-type: none"> • If allowance had been made for flood zones, Green Belt and Lee Valley Park then housing allocation would have been less and maybe achievable without the controversial loss of building in a

	<p>regional park and loss of Green Belt (already lost 6% of Green Belt in district, the largest national loss).</p> <ul style="list-style-type: none"> • Approved Village 7 near Netherfield Lane site is unnecessary development within Lee Valley Park which sets dangerous precedent – Part 2 Paragraph 5 of bylaws under Section 28 of 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.” Consent has not been sought or granted so proceeding would be a violation of above Act. • Paragraph 180 of NPPF states that planning permission should be refused when resulting in serious harm to biodiversity / deterioration of irreplaceable habitats. Lee Valley Park is undoubtably irreplaceable habitat. • We must develop new approach to housing crisis which avoids sacrificing our green spaces – property developers will keep coming back for more.
SASM-16 J Hickford	<p>Object:</p> <p>24.5 Air Quality (Netherfield Lane):</p> <p>A Stanstead Abbots Parish Council commissioned Traffic Survey shows that Netherfield Lane development will cause 60 additional car movements in the village at peak times. 2/3 (approx. 40+ vehicles) would travel westbound significantly increasing congestion and air pollution, particularly due to idling at train barrier.</p> <p>Most sensible plan is for development west of the village near main truck routes at Amwell roundabout, removing traffic from the village. There are also very few pedestrians at the roundabout compared to the High Street.</p> <p>Sites to the west were rejected due to coalescence with Hoddesdon, but this ignores industrial/urban coalescence with Harlow to the east resulting from Briggens Estate quarry and Gilston Garden Village development & additional air pollution.</p> <p>Also, under 24.3.3 Tranquil Spaces, this is lost with the loss of open space behind Almshouses.</p>
SASM-17 Network Rail	<p>Comments:</p> <p>Network Rail has provided important general standard comments and guidance regarding the SASM NP, structured follows:</p> <ol style="list-style-type: none"> 1) Development <ol style="list-style-type: none"> a. Freight Sites – Strategic Importance for Policy and Development 2) Railway Infrastructure <ol style="list-style-type: none"> a. Level Crossings

	<p>i. Maltings Level Crossing b. Wider Infrastructure</p> <p>3) Further Consultation Requirement & Future Policy Engagement 4) Asset Protection (ASPRO) a. Appendix A –a list of asset protection Informatives</p> <p>At this policy stage it is difficult to determine impacts, so appropriate developers should consult with us in the future as plans develop at each site. Would welcome further engagement in the neighbourhood plan and East Herts Local Plan.</p>
SASM-18 G Hayter	<p>Object:</p> <p>Use of Green Belt:</p> <ul style="list-style-type: none"> Appalled by the unacceptable outcome of using Green Belt land in the Lea Valley Park. Resident surveys showed overwhelming objection to development in Green Belt and this has been completely ignored. Netherfield Lane site is an area of natural beauty – unnecessary to devastate it with housing when other non-green belt sites were overlooked. Concern around coalescence has removed housing sites, yet Netherfield Lane will be short distance from Village 7 housing development. Green Belt should not be used, it compromises resident quality of life & the rural landscape which is treasured by the local community. With invasion of housing from Harlow we must protect Green Belt to maintain our boundaries, rather than develop them and join the urban sprawl. <p>Environmental Impact:</p> <ul style="list-style-type: none"> Unknown & significant risk of quarry development near Netherfield Lane. Inappropriate to build housing so close to quarry which may cause health issues, noise pollution and traffic. East Herts District Plan states that development which causes loss of trees, hedgerows or woodlands will not be permitted. Yet, Netherfield Lane Site has already seen decimation of dozens of trees by landowner and will continue – breaching District Plan policies. Also significant land contamination on fringes of site relating back to site's previous uses. <p>Flooding:</p> <ul style="list-style-type: none"> Netherfield Lane & neighbouring properties adjacent to Roydon Rd have increased in risk to flooding in last decade – more properties in flood prone green fields heightens this risk.

	<ul style="list-style-type: none"> Flood defences cannot cope with rainfall & it is unclear whether plans to improve them will be sufficient. More housing & less green fields can only make situation worse – horrendous outcome for residents. <p>Noise and Light Pollution:</p> <ul style="list-style-type: none"> Netherfield Lane development will introduce street lighting / housing lighting in Lea Valley Park area which is currently very low / non-existent. Residents that enjoy living on the rural fringes of SA will be compromised by noise and light infringing their quality of life. <p>Conclusion:</p> <p>There are thousands of houses being built near Stanstead Abbots making it completely unnecessary to sacrifice Green Belt land for 40 homes. We must protect Lea Valley Park and Green Space which we still have.</p>
SASM-19 Historic England	<p>No comment:</p> <p>Historic England do not consider it necessary to provide comment at this time but refer you for any further detailed advice regarding neighbourhood plans here:</p> <p><https://historicengland.org.uk/advice/planning/plan-making/improve-yourneighbourhood/></p>
SASM-20 Lee Valley Regional Park Authority	<p>Comments and objection:</p> <p>The Authority maintains its support of the vision and objectives for Stanstead Abbots and St Margarets, which provide a sound Neighbourhood Plan framework to protect and enhance the natural environment, its heritage assets and community facilities and the promotion of sustainable development.</p> <ul style="list-style-type: none"> The references to Lee Valley Regional Park & the Park Development Framework (PDF) within the section 'Local Planning Policy' are welcomed, as well as the reference to the Park & PDF Area 8 proposals added to narrative for H3 on land within the park. Detail about the remit of the Regional Park Authority is missing and should be included to provide context for PDF & Authority's role. <i>See Original response doc for suggested wording.</i> <p>Site Allocation H3 (Netherfield Lane):</p> <ul style="list-style-type: none"> The Authority welcomes the changes made to Policy H3 in response to previous comments. Also appreciates the importance of H3 in providing a range of housing.

- However, allocation proposes substantial development within the Park requiring removal of Green Belt & inclusion of undeveloped green land which will significantly alter the Park's landscape. This would be contrary to PDF proposals and EHDP's supportive Policy CFLR5.
- Development will inevitably reduce connectivity of habitats, introducing light pollution and increasing vehicular movements along a pedestrian / cyclist / bridleway route.
- The Authority objects to the inclusion of the undeveloped portion of the site allocation.

Riverside and Heritage:

A reference to maintaining dark corridors could be added under Policy SASM R1, to recognise importance of waterways and waterside environment for foraging and commuting wildlife which connect with other habitats up and down the valley.

Heritage:

- Resources for Action H3 are stated as 'unknown' but the NP could identify developer contributions as a mechanism where appropriate.
- Steering Group response regarding Lee Navigation industrial heritage (at Appendix 26) suggests matter is dealt with in District Plan – a reference to relevant policy / section would be helpful.

Views:

Policy SASM HA4 'Protected Views does not include the long view both out to and from rural valley sides to the east – described as a key characteristic for Landscape Character Area G1 in LVRP Landscape Strategy. Proposing inclusion in SASM HA4 due to importance to landscape character.

Natural Environment:

A plan mapping various nature conservation sites would be a helpful addition to NP (NE2).

BNG:

- Measures to deliver BNG should be informed by the Authority's BAP and reference to said document should be included in supporting text.
- Supports new text under Para 8.45 regarding on-site BNG contributions & suggestion of Action Plan for identification of suitable off-site locations within NP boundary. Important this action

	<p>be transferred into SASMNP Action Plan at Appendix J. New suggested Action Plan should be included in Action E2 & Authority Officers would welcome opportunity to discuss potential sites within Regional Park.</p> <p>Leisure and Tourism Policy:</p> <p>Policy SASM CL4 suggests new tourism accommodation should be in the village but may be scope for accommodation in the Regional Park within NP wider area. Officers open to exploring further with Steering Group and relevant stakeholders.</p> <p>Transport:</p> <ul style="list-style-type: none"> • Support for development that respects and enhances PROW (stated in Policy TR1) could be expanded to reference enhancement and protection of other Park routes, such as those which combine PROW to create circular pedestrian / cyclist routes, the Lee Valley Pathway connecting to NP area south of A414, and the Lea Valley Walk along towpath. • Needs and safety of park visitors should be considered. Potentially relevant & supported Action Plan projects: T2 to improve road safety at key junctions should consider safe crossings, Project T1 to promote public EV charging points, T4 to provide secure cycle parking facilities, and T6 to improve provision of bus services which connect village with nearby centres. <p>Implementation:</p> <p>Appendix J identifies spending priorities for Environment topic which is supported – Authority would welcome opportunity to consider scope to include other priorities regarding BNG or to secure other improvements to the natural environment and the accessibility of neighbourhood area / Regional Park.</p>
SASM-21 A Day	<p>Support:</p> <p>Process has been very thorough & well managed by a dedicated team. I believe the result of deliberations, i.e. the decision to promote H3 as the preferred site for majority of dwellings is correct and logical.</p> <p>Websters brownfield site cries out for redevelopment and field alongside has never been cultivated or used for anything despite being green belt. Would be better used for housing.</p>
SASM-22 P Biggs (PJB Planning on	<p>Various comments and objections:</p> <p>Commenting as an agent on behalf of Catesby Estates who have interest in land known as Site No. C2 and have been promoting the site</p>

<p>behalf of Catesby Estates)</p>	<p>for development throughout NP process. Proposal could deliver 92 homes inc. 37 affordable, recreational open spaces, community allotments and a public car park.</p> <p>Comments on Evidence Base and SEA:</p> <ul style="list-style-type: none"> • Notes that the SEA was undertaken in June 2024 and should be updated to assess implications of NPPF December 2024 update and EHDC's lack of 5YHLS. Should also consider hybrid options to provide dwellings including delivery at sites K, L (i.e. Proposed allocation H3) and site C2. • It is unclear why Option 3 (which includes site C2) is ranked lower in the Landscape theme (page iv of Non-Technical Summary SEA) than Option 4 as they would have same impact. Should be at least equal. Option 3 should also be higher than Options 2 and 4 under Transportation and movement theme due to vicinity to train station. These changes would improve overall score of Option 3 making it the preferred option, therefore bringing into question validity of the SEA. <p>NPPF 2024 and EHDP 2018:</p> <ul style="list-style-type: none"> • Notes that EHDC currently has 5YHLS shortfall under updated housing need standard methodology, making District Plan 2018 Policy DPS1, 2 and 3 out of date. This brings into question validity of SASMNP which seeks to provide 94 dwellings based on outdated policies & therefore does not meet the current housing need. • Green Belt purposes a, b and d do not apply to land designation around SASM as they refer to towns. SASMNP is out of sync with updated NPPF due to lack of Green Belt review from East Herts District Council. • SASMNP should be considered unsound or modifications must be made to consider updated housing need and green belt review. <p>Neighbourhood Plan comments:</p> <p>Paragraphs 1.11 and 1.12 – Community Engagement: Local community not given chance to comment on benefits of Site C2. Preference towards H3 allocation is not explained & community not consulted on alternatives.</p> <p>Paragraph 3.4 – Objectives: Provides reasoning for Site C2 being appropriate and preferable in relation to Objectives A, J, and L for reasons relating to achievability of sustainable development, ecosystem diversity, BNG, and community, leisure and recreation facilities.</p>
-----------------------------------	---

	<p>Paragraph 4.7: Site C2 would comply with Green Belt release requirements – well contained by A414 and Station Road and does not project further west than existing right of way. 8 out of 9 proposed allocations, and the windfall allowance of 6 houses, are less than 11 dwellings and make no contribution to affordable housing – overall amount provided will be much less than 40%.</p> <p>Policy SASM H3: Bearing in mind the viability case made for 0 affordable homes provided in the granted permission for 20 homes at Netherfield Lane (3/20/0502/OUT), there is question of viability and deliverability of sufficient affordable housing on remaining site under SASM H3.</p> <p>Policies SASM H16: Site C2 would meet aspirations under Part II regarding one / two-bedroom flats near public transport routes, due to its location near train station.</p> <p>Section 7 heritage Assets and SASM HA4: Protect views: Protected views 1 and 2 cover site frontage of H3; Site C2 would have no impact on the conservation area, any listed buildings, and is unaffected by protected views – should be taken into account.</p> <p>Section 9 Leisure and Community Facilities: Policies seek to protect, maintain and support leisure and community village facilities but there is no review of current facilities / village requirements during plan period 2017 – 2033. Further consideration should be given – recreational opportunities provided by Site C2 (informal and informal outdoor recreation). It would provide additional allotments, supported in Paragraph 8.11 and in Part I. criteria a) of Policy SASM CL4.</p> <p>Section 11 Transport and Paragraph 11.3: Concern is acknowledged in SASMNP regarding parking at St Margarets train station but not addressed – Site C2 could provide public parking in close proximity and should be considered. Would also alleviate traffic queuing at level crossing outside station. Locational benefit not highly ranked enough within AECOM SEA site assessment.</p>
SASM-23 Natural England	<p>Comment:</p> <p>Very pleased to see that comments made at previous draft stage of the SASMNP have been incorporated. Especially welcome the inclusion of Green Infrastructure Framework (para 5.15) and specific reference to green roofs, bird boxes/bee hotels, as well as policy SASM NE2 regarding mitigation for nationally protected sites within NP boundary.</p> <p>Includes further standard advice for preparation of a Neighbourhood Plan.</p>

SASM-24 Hertfordshire Gardens Trust	<p>Support:</p> <p>The Hertfordshire Gardens Trust welcomes the inclusion 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.</p>
SASM-25 Essex County Council	<p>No comment:</p> <p>ECC does not consider it necessary to provide comments in response to the current consultation.</p>
SASM-26 B Burt & R Burt	<p>Object:</p> <p>Policy H3 Land East of Netherfield Lane:</p> <ul style="list-style-type: none"> • 111. strongly object to 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 already been felled • 1V.g Impact on Cats Hill and Roydon Rd will cause extra vehicles turning in and out of dangerous junction. Moving junction will cause accidents and destroy a fine oak tree. • 1V.i The land behind our property is higher than our listed building and new housing will be above garden / rear windows taking light.
SASM-27 C Whellams	<p>Support:</p> <p>The implementation of SASMNP will help protect our village. Development is needed and identifying suitable sites will help ensure village remains as such / prevents coalition with Hoddesdon. Wholly support the sites put forward.</p>
SASM-28 C Ann Stevens	<p>Comment:</p> <p>P27 E&J:</p> <p>Netherfield Lane is a Bridleway and I have concerns on traffic caused by road layout of proposed development. Must be revised to retain existing hedging and trees.</p> <p>P33 5.7:</p> <p>Concerned about road layout & privacy of neighbours.</p>
SASM-29 S Forde (Housing Strategy, East Herts District Council)	<p>Comments:</p> <p>Paragraph 4.27 (page 23):</p> <p>Affordable homes on land donated to Baesh trust will be in addition to requirement for 40% on the part of site excluding land with planning consent (3/20/0502/OUT)</p> <p>SASM H3 IV (page 24):</p>

	<p>Contradicts para 4.27 - b) '40% affordable housing will be required including a 6-unit housing scheme made available to the Baesh Trust.' Should be made clear that the dwellings are in addition to the 40%.</p> <p>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.</p> <p>There is under provision of affordable 3 / 4 bed homes for rent – resulting in households in need spending more time on the register and often unable to move within area. Wording shouldn't inhibit provision of 4 bed affordable dwellings.</p>
SASM-30 J Witting	<p>Object:</p> <p>Policy H3 Land East of Netherfield Lane:</p> <p>Site proposed to take bulk of new homes takes no account of serious deficiencies which make for inadequate reasons to remove green belt land.</p> <ul style="list-style-type: none"> • SASM TR2 says development should not generate unacceptable traffic increase within or through village – without definition of 'unacceptable'. 60 new homes likely to add approx. 120 new vehicles flowing through High Street. • The site is located furthest side of village from station & co-op ensuring traffic through high street. • Lack of bus service around H3 site. Para 11.3 is misrepresenting adequacy of services which are infrequent, don't run on Sunday and very limited in evenings. • No community infrastructure planned for. • Area facing impending new quarry impacts & Gilston developments resulting in coalescence. • Site located in SSSI area and is rich with bats. • AECOM (evidence page 620) say new dwellings should be contingent on upgrades to Rye Meads Wastewater Treatment Works – no such commitment given. • Building in highest risk / prevalence area for flooding in village – references in plan using 'anecdotal' (para 8.54) and 'rare' (para 8.56) seriously underplay significant flood events increasing in frequency since 2014. Evidence referenced (page 17 of evidence) seriously out of date. Underinvestment in maintenance of drainage. SASM NE4 says nothing about risk of new homes increasing run-off – inadequate. • Taking out brownfield site at Netherfield Lane is illogical when business survey identified shortage of available premises (para 10.8).

	Site C2 is much more suitable and avoids most issues listed above.
SASM-31 Rye House Action Group	<p>Comment:</p> <p>Protection of the Rye House Stadium and its Speedway track and facilities.</p>
SASM-32 National Highways	<p>Comment:</p> <p>National Highways are content that there will be no specific adverse impacts on the safety or efficiency of the Strategic Road Network as a result of these proposals.</p>
SASM-33 A Combellack	<p>Object:</p> <p>Policy H3 Land East of Netherfield Lane:</p> <p>Site proposed to take bulk of new homes takes no account of serious deficiencies which make for inadequate reasons to remove green belt land.</p> <ul style="list-style-type: none"> • SASM TR2 says development should not generate unacceptable traffic increase within or through village – without definition of ‘unacceptable’. 60 new homes likely to add approx. 120 new vehicles flowing through High Street. • The site is located furthest side of village from station & co-op ensuring traffic through high street. • Lack of bus service around H3 site. Para 11.3 is misrepresenting adequacy of services which are infrequent, don’t run on Sunday and very limited in evenings. • No community infrastructure planned for. • Area facing impending new quarry impacts & Gilston developments resulting in coalescence. • Site located in SSSI area and is rich with bats. • AECOM (evidence page 620) say new dwellings should be contingent on upgrades to Rye Meads Wastewater Treatment Works – no such commitment given. • Building in highest risk / prevalence area for flooding in village – references in plan using ‘anecdotal’ (para 8.54) and ‘rare’ (para 8.56) seriously underplay significant flood events increasing in frequency since 2014. Evidence referenced (page 17 of evidence) seriously out of date. Underinvestment in maintenance of drainage. SASM NE4 says nothing about risk of new homes increasing run-off – inadequate. • Taking out brownfield site at Netherfield Lane is illogical when business survey identified shortage of available premises (para 10.8).

	<p>Site C2 is much more suitable and avoids most issues listed above. The plan is not only flawed it is very misleading and only serves some of the proposers and not the residents in the area.</p>
<p>SASM-34 J Dumont</p>	<p>Support:</p> <p>Ward Councillor – pleased to support the plan and welcomes the hard work & commitment from all involved. Acknowledges that not everyone will welcome development and recognises residents’ concerns but values the importance of a Neighbourhood Plan in guiding development, rather than having it imposed upon us.</p> <p>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.</p> <p>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.</p>
<p>SASM-35 Virgin Media</p>	<p>Comment:</p> <p>If there is going to be any excavation works, please inform us about location so we can check if we have assets underground.</p>
<p>SASM-36 Canal & River Trust</p>	<p>Comments:</p> <p>Disappointed to not have been consulted at previous stages, but appreciative opportunity to give input now. It is encouraging the draft NP recognised the importance of the waterway network and the role it can play in supporting sustainable communities.</p> <p>Section 6 – Riverside:</p> <ul style="list-style-type: none"> • The Trust own the River Lee Navigation (RLN) and the River Stort Navigation (RSN) & must be consulted at early stage for any proposals. The Trust should be referenced as a key stakeholder in Para 6.1. • Para 6.3: additional emphasis should be given on the heritage of the RLN & importance for the evolution of NP area. • Para 6.6: the hyperlink to ‘The Waterways Trust’ should instead link to the Canal & River Trust website, and maybe a link to the Inland Waterways Association. • Para 6.4: water spaces / waterways are integral to wider networks & should be a starting point for development considerations. The

	<p>Trust requires any waterway frontage development to not adversely impact waterway structure.</p> <p>Buildings should optimise views / environs of waterways & proposals must avoid development 'back of house' / parking arrangements being visible from waterways outward perspective.</p> <p>Requirements above should be included in NP & we encourage developers to undertake pre-app discussions with the Trust.</p> <p>Policy SASM R1-Riverside Development:</p> <ul style="list-style-type: none"> • BNG requirements for watercourse assessments should be referenced. • Without exemption, developers need to deliver 10% minimum net gain in watercourse biodiversity units & River Condition Assessments are required where the riparian zone could be impacted. • No works on Trust land should take place without consent, including any surveys and assessments. • The trust may be able to assist with meeting BNG requirements by providing off-site units. • R1/III: policy should be amended to support access along the river via improved towpaths. (<i>Suggested wording included in original response</i>). • Policy SASM/ II Part d) – no details provided in explanatory text about river bus establishment. The Trust were not consulted on these proposals and LVRPA did not comment. Impacts of this service would require consultation and consideration with The Trust & a commercial agreement. Trust would not take on operational or maintenance responsibility so proposals must provide details for this. Further details & feasibility study or prioritised intention of feasibility study should be mentioned in text. • Policy SASM R2- Floating Structures: Title needs review – unclear what is meant by floating structures as it covers moorings too. Further impacts on floating structures should be referenced in policy (structural integrity, navigational safety, safety to waterway users, ecology & biodiversity, character, appearance, and heritage). Structures within Trust waterways would need separate approval as landowner and commercial agreements. A definition of 'permanent moorings' should be added into text to include leisure, residential and trade. Increase in moorings must consider impacts on navigational channel & may require dip surveys / dredging to ensure maintenance. <p>Section 7 – Heritage Assets</p>
--	--

	<p>Additional text emphasising historical background of River Lea Navigation (RLN), Lee Valley Regional Park Authority also referred to wider RLN heritage in their Reg 14 response but has not been transferred into Reg 16 plan version.</p> <p>Reference to boats as contributor to the protected view from Bridge 59A Abbots Rd (nos.9&10) would be welcomed.</p> <p>Section 8 – Natural Environment</p> <p>Policy SASM NE1- Local Green Spaces (LGS): any LGS designations mustn't extend over waterway corridor, towpath or the Trust's land interests – clearer plans should be provided to demonstrate this.</p> <p>Should be acknowledged that Trust's ability to operate and maintain infrastructure will not be inhibited.</p> <p>BNG requirements for watercourse assessments should be referenced & paragraphs 8.44 / 8.45 updated accordingly.</p> <p>Section 9 – Leisure and Community Facilities</p> <p>Policy SASM CL2 should be reworded to mention promoting active use of towpaths, as well as river / river paths.</p> <p>Section 10 – Business and Employment</p> <p>Wording should be amended to make clear that consultation with the Trust is required for both a) and b) within Part II.</p> <p>Further clarity required as to whether 'river bus' and 'water taxi' are the same. Previous comments about river bus implementation also apply to water taxis.</p> <p>Section 11 – Transport</p> <p>Policy SASM TR1 Parts I and II: reference to PROWs should not be limited to PROWs but include more general walking & cycling infrastructure – could require development to enhance existing routes & include towpaths on waterways to access green and recreational spaces. Lee Valley Regional Park Authority suggested this (p.102) but not included in NP.</p> <p>RSN towpath near Roydon Station should be referenced specifically to ensure inclusion in improvements resulting from nearby development.</p>
--	--

	<p>Support LVRPA comments regarding safe crossings at key connections with towpath / LVRP access. Source of funding for S106s from developments impacting the LVRP should be written into delivery plan.</p> <p>Appendix J-Action Plan</p> <p>Action to make paths and towpaths more attractive states working with councils – should also consult the Trust.</p>
SASM-37 S Wilkinson (The Roydon Society)	<p>Comments:</p> <ul style="list-style-type: none"> • Issue referenced in plan regarding A414 slip road onto B181 having insufficient site line. Hopefully with additional traffic from development, improvements will be made to this exit. • NP decision should be delayed until Call for Sites suggested sites for SASM are finalised, as this could increase numbers of property built without support infrastructure. • B181 verges currently used as 'rat run' by motorists to avoid works for HGGT at Eastwick through to Harlow. Hertfordshire Highways should factor maintenance of this road into finances.
SASM-38 Swifts Local Network: Swifts & Planning Group	<p>Comment:</p> <p>The biodiversity references are too general & do not refer to Swift Bricks to align with NPPF December 2024 and NPPG 2019 Natural Environment paragraph 023. Should be updated as per advice submitted by local Swifts Group representative</p>
SASM-39 Minerals and Waste Policy, Hertfordshire County Council	<p>Comments:</p> <p>Paragraphs 1.6 and 2.6 refer to emerging Minerals and Waste Plan 2040, we request they also reference all adopted Minerals and Waste Local Plan documents:</p> <ul style="list-style-type: none"> • Minerals Local Plan Review 2007 • Waste Core Strategy and Development Management Policies Development Plan Document (DPD) 2012 • Waste Site Allocations DPD 2014 <p>An updated Minerals and Waste Development Scheme will be posted on HCC website in future to detail updated timeline for emerging documents & future adoption.</p> <p>MAS01 Briggens Estate:</p> <ul style="list-style-type: none"> • Para 2.6 states concern regarding routing of lorries away from Briggens site due to lack of west bound slip road onto A414 – The Draft Minerals and Waste Local Plan 2022 addresses these in full

	<p>(Site-Specific Requirements contained in Policy 2 and Site Brief at Appendix 1 of Plan).</p> <ul style="list-style-type: none"> • Policy Evidence Reports for emerging Minerals and Waste Local Plan – Post Reg 18 (2024 – available at Hertfordshire.gov.uk/mwlp) include ‘PS-EVR-2 Meeting Sand and Gravel Needs (Mar 2024)’ which addresses main Reg 18 concerns relating to MAS01 including traffic at Para 4.6: Criterion m) addresses traffic and congestion on local roads; HCC response details on p.14 stating Highways Authority assessment revealed no concerns. • PS-EVR-A1 Site Briefs (Jan 2024) addresses common Reg 18 concerns: Pages 9 and 10 detail council response. Criterion c) and criterion d) evidently should allay concerns around routing & traffic / amenity issues for nearby residents. Specifically mentions open space provision & enhanced site connectivity; minerals extraction temporary therefore not impacting green belt status. • Para 1.15 of SASM and Criterion f) within Para 4.6 of PS-EVR-2 reference impact on landscape and Green belt. Council response also within Criterion f) – Green Belt not removed but temporarily worked and restored; will not constitute continuous urban extension.
SASM-40 W Brown	<p>Support:</p> <p>Para 4.27 – Baesh Almshouses: Very important part of plan making development -costs borne by the Trust & ensuring delivery of truly affordable accommodation. No such certainty with commercial development.</p>
SASM-41 W Brown	<p>Comment:</p> <p>Para 4.28 – Housing Needs: EHDC analysis identifying greatest need for 2-3 bed family homes is correct. Estate agents report need for larger homes, overlooking hidden households identified in 2021 census. Need more 2-3 bedroom homes in the area.</p>
SASM-42 W Brown	<p>Comment:</p> <p>SASM H3 Netherfield Lane: Housing mix defined in Section IV (a) does not follow need for 2-3 bed housing as per EHDC analysis. Identifying supply as only the exact new homes constructed is a mistake; calculation should consider downsizing which releases larger properties to market.</p>

	<p>Affordable housing 40% is essential to provide for key workers who are essential to local economy. SASM H3 IV (a) should be 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."</p>
<p>SASM-43 Hunsdon Parish Council</p>	<p>Comments:</p> <p>Minerals and Waste:</p> <p>Para 2.6 referring to Briggens Estate site states 'very likely' there will be quarry on site meaning continuous extraction for 25 years. Text should be edited to remove this assumption. Should also be made clear that lack of west facing slip roads onto A414 means access will be via B181 through village centre or Roydon or via B180 through Hunsdon to A414.</p> <p>Policy TR2 Traffic Impact of Major Development needs strengthening to consider potential quarry development, specifically covering B180 and B181 in adjoining parishes. 'Unacceptable increase' needs specificity regarding vehicle type, restricting movement in actual terms rather than percentage.</p> <p>Policy HA4: Protected Views: Disappointing that no views across Olives Farm included. The view is most impressive and would be destroyed by Sand and Gravel extraction. Should be included.</p>
<p>SASM-44 Hertfordshire County Council</p>	<p>Comments reflect interests of Herts County Council's Highway and Transport and Lead Local Flood Authority services:</p> <p>Highways and Transport:</p> <ul style="list-style-type: none"> • Objective Q should be reframed around achieving reduced vehicle speeds rather than specifying a solution which raises expectations for which HCC responsible. Should recognise HCC guidelines on traffic calming measures & speed limits in Speed Management Strategy to identify appropriate solutions. • Objective R 'to promote parking provision in accordance with EHDC parking standards' & Policy TR3, Parking Standards do not accord with HCC approach to development or Transport User Hierarchy which prioritises sustainable travel (Policy 1 of LTP4), and reflects concerns over congestion, speed and air quality (Para 11.4 onwards). Significant parking increases likely to exacerbate issues rather than address them.

	<ul style="list-style-type: none"> • Policy TR1, Safe and Sustainable Transport: Helpful addition would be to consider public transport access (both rail and bus services serving Stanstead Abbots). • Policy TR2, Traffic Impact of New Development: Does not accord with HCC's LTP4. Developments should align to LTP4 rather than demonstrate credentials in terms of vehicular capacity / movement. This policy should be reframed or removed. • Paragraph 11.15 should be revisited since South Eastern Growth & Travel Plan has now been adopted – its impact should be considered. • Paragraph 11.16 – should be recognised that EV charging implementation should accord with our emerging EV Charging Strategy. <p>Lead Local Flood Authority:</p> <p>General comments:</p> <ul style="list-style-type: none"> • Sequential tests should be carried out for development sites within Flood Zones 2 or 3 – see para 175 of NPPF. • Guidance and info on SuDS applicable to all sites – see full response. • LLFA has identified SASM as surface water flood risk hotspot – existing flood defences must be maintained. • Para 8.57 is inaccurate and should be reworded. LLFA is NOT responsible for carrying out flood risk assessments, but to advise the LPA (EHDC) on new developments. <p>Site specific comments:</p> <p>H3 Netherfield Lane</p> <ul style="list-style-type: none"> • Medium-high flood risk area on western boundary must be considered in drainage designs. • Netherfield Ln, Roydon Rd and nearby properties have flooding history. Important that surface water generated is managed to avoid offsite flood risk increase. • Whole site should be restricted to greenfield runoff rates and volumes. SuDS should be used rather than below ground features such as attenuation tanks. • Ground investigation should be undertaken to identify contamination sources due to previous factory use. If identified,
--	--

	<p>remediation is required to avoid water contamination – SuDS may need to be lined.</p> <p>H6 Chapelfields</p> <p>Pending Section 19 Flood Investigation in site area north of Abbotts Way due to reports of internal flooding – discharge rates must be restricted to greenfield rates and volumes and measures to prevent surface water runoff.</p> <p>All development should comply with local and national SUDs guidance.</p>
SASM-45 Thames Water	<p>Support / Assessment:</p> <p>RAG assessments undertaken for sewerage infrastructure capacity for proposed allocations within NP. Both sites H3 and H6 are assessed as 'green' for Waste Network RAG Assessment and STW RAG Assessment.</p> <p>Text in paragraphs 8.40 and 8.41 is supported.</p>
SASM-46 Virgin Media (Plant Enquiries)	<p>Comment:</p> <p>Please contact us when construction is taking place to obtain area specific Virgin Media asset plans to ensure safe digging. We may also need to obtain a wayleave or divert our services.</p>
SASM-47 Environment Agency	<p>No Comment:</p> <p>No further comments to Reg 14 representation dated 26 June 2024. This is because there have not been any changes relevant to our remit since the last consultation response.</p>

