

East Hertfordshire District Council **Sustainability Appraisal Scoping Report**

Final Report
March 2010



Photographs courtesy of East Herts District Council

Revision Schedule

Sustainability Appraisal Scoping Report March 2010

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1 Introduction

1.1 This report

- 1.1.1 Scott Wilson has been commissioned by East Hertfordshire District Council ('the Council') to carry out the Sustainability Appraisal (SA) of the East Herts Core Strategy. The Core Strategy forms part of the East Hertfordshire Local Development Framework (LDF).
- 1.1.2 SA involves identifying and evaluating the impacts of a plan on the economy, the community and the environment – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing any adverse impacts arising from the plan as well as ways of maximising its positive impacts. SA is a statutory requirement for Core Strategies and other Development Plan Documents (DPDs) under the Planning and Compulsory Purchase Act 2004.
- 1.1.3 In order to undertake the appraisal of the Core Strategy and other DPDs, it is first necessary to establish a methodology or framework for undertaking the appraisal as well as an evidence base to inform the identification and evaluation of impacts. The framework and evidence base are documented in a Scoping Report.
- 1.1.4 It should be noted that the SA incorporates a Strategic Environmental Assessment (SEA) as required under EU legislation¹.

1.2 East Hertfordshire Core Strategy

- 1.2.1 The Council is currently preparing their Issues & Options document for consultation. This report provides the framework and evidence base for undertaking the appraisal of the Core Strategy and other DPDs.

1.3 Report structure

- 1.3.1 This report is structured as follows:
- Chapter 2 sets out the approach to preparing the Scoping Report
 - Chapters 3 – 8 set out the evidence base for key spatial areas in East Hertfordshire
 - Chapters 9 – 19 set out the evidence base for key sustainability topics
 - Chapter 20 sets out the HRA/AA
 - Chapter 21 sets out what happens next in the plan-making and SA processes.

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and Programmes on the environment (the 'SEA Directive') implemented through The Environmental Assessment of Plans and Programmes Regulations 2004

2 Approach to the SA

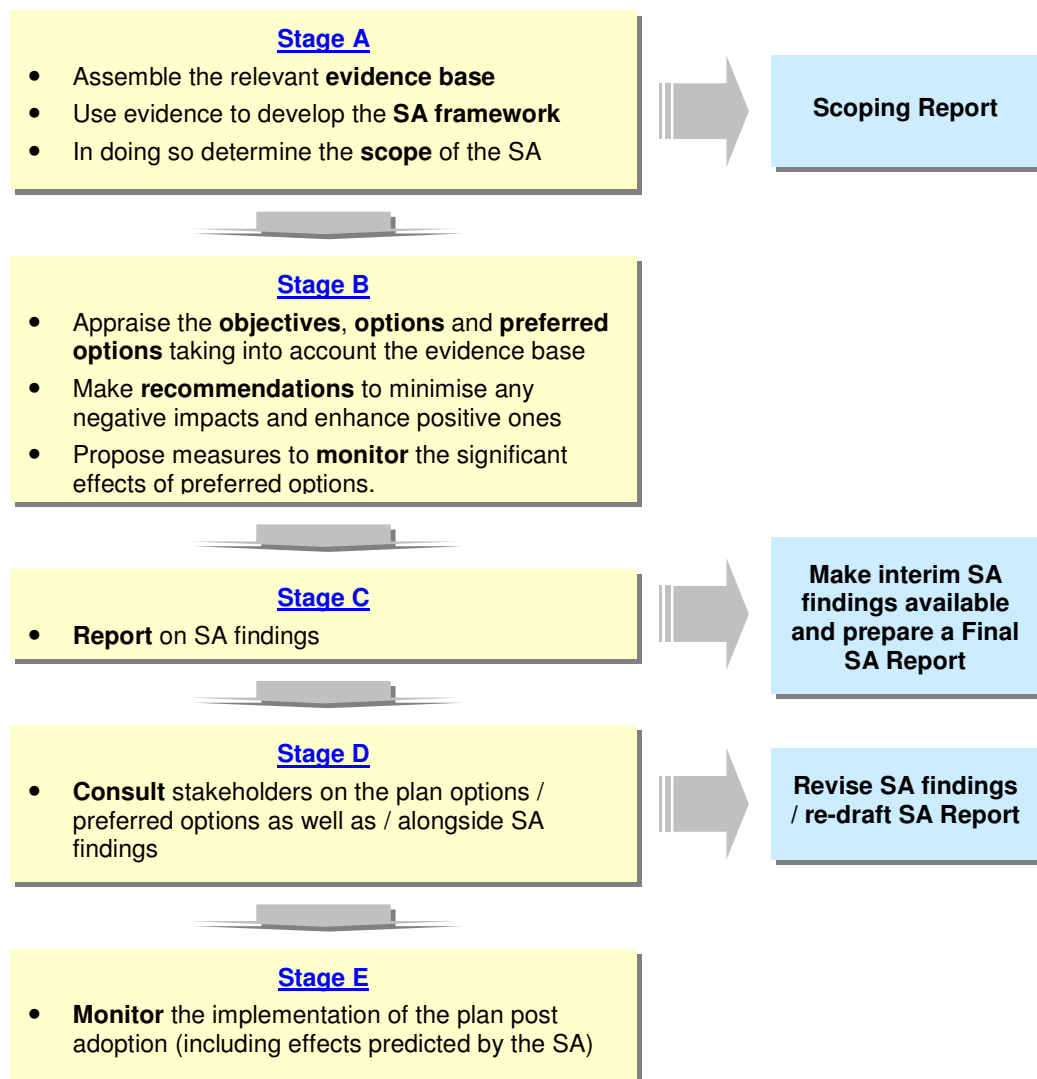
2.1 Introduction

- 2.1.1 This chapter sets out the approach taken in preparing the Scoping Report including the proposed framework around which the appraisal will be organised.

2.2 SA process

- 2.2.1 SA is based on a five-stage approach – see Figure 1.

Figure 1: Five stage approach to SA



Stage A – Framework and evidence base

- 2.2.2 Stage A in the SA process involves developing the framework for undertaking the appraisal – in this case the identification of a series of spatial areas and topics on which the appraisal will focus – together with an evidence base to inform the appraisal. The framework and evidence base are presented in a Scoping Report – this report – for consultation with stakeholders including English Heritage, the Environment Agency and Natural England and the public. The evidence base presented in the Scoping Report should include an analysis of the relevant policy context; a description of the current baseline situation; an analysis of how the current situation might evolve in the absence of the plan; and the identification of any problems which the plan may need to address.

Stage B – Appraisal

- 2.2.3 Stage B in the SA process involves undertaking the appraisal itself. This involves identifying and evaluating the impacts of the different options to the plan makers as well as the preferred options / policies which together comprise the plan. The appraisal is organised around the framework identified in Stage A and informed by the evidence base assembled at Stage A. Mitigation measures for alleviating adverse impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation. Mitigation measures are generally in the form of recommendations for changes to the plan in order to improve its sustainability performance. Crucially, the appraisal should be undertaken in parallel with development of the plan and the appraisal findings should be fed into the emerging plan. In practice, this means undertaking several rounds – or iterations – of appraisal at different stages in the plan-making process.

Stage C – Reporting

- 2.2.4 Stage C in the SA process involves documenting the appraisal findings and preparing an SA Report (this incorporates the material required for inclusion in the 'Environmental Report' under the 'SEA Directive'). The full SA Report should be published for consultation alongside the 'pre-submission' version of the DPD in question; however, SA reports focusing on the emerging plan may be published earlier in the plan-making process (e.g. at the 'issues and options' stage).

Stage D – Consultation

- 2.2.5 Stage D in the SA process involves consulting on the 'pre-submission' version of the plan and the accompanying SA Report; however, as stated above, SA reports can be prepared to accompany consultation on earlier versions of the plan.

Stage E – Monitoring

- 2.2.6 Stage E in the SA process involves monitoring the adopted plan including its sustainability impacts; this is done through the LDF Annual Monitoring Report (AMR).

2.3 SA methodology

- 2.3.1 This Scoping Report has been structured around a series of spatial areas within East Hertfordshire district as well as a series of topics. Together, these spatial areas and topics provide the proposed framework for undertaking the SA. The purpose of the spatial areas is to add an additional level of analysis but it is not to carry out a full sustainability appraisal at a more local level. The spatial areas have been defined entirely for the purposes of the sustainability appraisal and do not predetermine where development will go.
- 2.3.2 For each spatial area and topic identified, we have asked a series of questions in order to complete the Scoping Report. Many topics and spatial areas include cross-cutting issues, for example relating to flooding, climate change, and biodiversity. The sustainability appraisal will apply an integrated approach to such issues where appropriate. The questions are:
- What's the policy context?
 - What are the key sustainability objectives that we need to consider?
 - What's the situation now (including any identified problems)?
 - What will be the situation without the plan?²
 - What issues should be a particular focus for the appraisal?
- 2.3.3 For future rounds of appraisal itself, we will also ask the following questions:
- What will be the situation with the plan?
 - How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?
 - How can we best monitor the plan's impacts?
- 2.3.4 These questions correspond to the key requirements of the SEA Directive, therefore clearly demonstrating compliance with the Directive's requirements – see Table 1.

² Note that the situation without the plan equates to the current plan for the District together with other future changes and trends.

Table 1: Meeting the requirements of the SEA Directive

Key questions	Corresponding requirement of the SEA Directive (the 'environmental report' must include...)
What's the policy context?	<i>"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"</i> (Annex I(a))
What are the key sustainability objectives that we need to consider?	<i>"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"</i> (Annex I(e))
What's the situation now (including any identified problems)?	<i>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"</i> (Annex 1(b)) <i>"the environmental characteristics of areas likely to be significantly affected"</i> (Annex I(c)) <i>"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC"</i> [NB problems relating to European sites are addressed through Habitats Regulations Assessment] (Annex I(d))
What will be the situation without the plan?	<i>"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"</i> (Annex I(b))
What will be the situation with the plan?	<i>"the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors"</i> [our emphasis] <i>(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects"</i> (Annex I(f))
How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?	<i>"the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme"</i> (Annex I(g))
How can we best monitor the plan's impacts?	<i>"a description of the measures envisaged concerning monitoring..."</i> (Annex I(i))

- 2.3.5 In relation to the question ‘What are the key sustainability objectives that we need to consider?’ we have focused in particular on the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2.
- 2.3.6 The SA Scoping Report forms a basis for appraisal of strategic growth options rather than site-level considerations. Therefore, consideration of site-level sustainability issues such as green roofs or particular renewable technologies have not been considered relevant for the purposes of the Scoping Report. Infrastructure provision and delivery-related issues are also largely outside the scope of sustainability appraisal, but will need to be considered by the Council in the preparation of the Core Strategy and subsequent LDF documents.

Table 2: Integrated Regional Sustainability Framework objectives

East of England Integrated Regional Sustainability Framework Objectives	
1	Promote sustainable growth within environmental limits
2	Reduce poverty and inequality and promote social inclusion
3	Reduce greenhouse gas emissions
4	Adapt to the impacts of climate change
5	Promote employment, learning, skills and innovation
6	Increase resource efficiency and reduce resource use and waste
7	Conserve, restore and enhance the region’s natural and built environment
8	Move goods and people sustainably
9	Meet the needs of the changing regional demographic
10	Provide decent, affordable and safe homes for all

2.4 Proposed SA framework

- 2.4.1 In identifying the spatial areas and topics that will provide the basis for the appraisal, we have considered:
- The topics addressed in the SA of the East of England Plan³
 - The topics suggested in the SEA Directive (see Table 1 above)
 - The likely significant effects of the Core Strategy

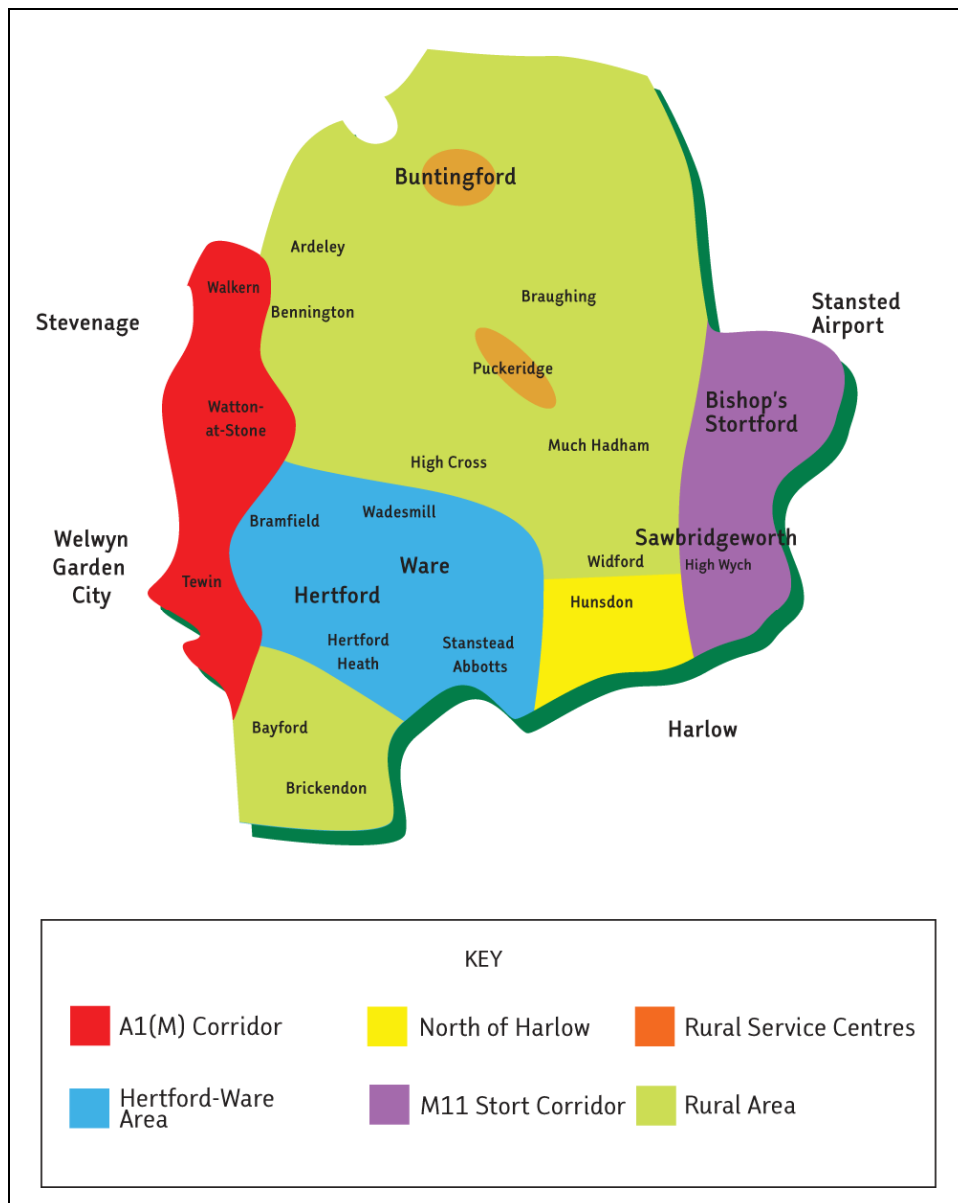
³ Scott Wilson and Land Use Consultants (2009) *East of England RSS Review: Integrated Sustainability Appraisal Scoping Report* [online] available at: <http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/east-of-england-plan-review-to-2031/east-of-england-plan-review-to-2031-integrated-sustainability-appraisal/> (accessed 2 February 2010)

- The views of the Council.

2.4.2 As shown in Figure 2 the proposed spatial areas are:

- A1(M) Corridor
- Hertford-Ware Area
- M11 Stort Corridor
- Rural Service Areas
- Rural Area
- North of Harlow

Figure 2: East Herts Spatial Areas



- 2.4.3 East Hertfordshire District Council has requested that Scott Wilson prepare baseline information for spatial areas that are geographically defined by:
- the functional consistency and logic which underpins the district's Housing Market Areas (HMAs)⁴ (i.e. the A1(M) corridor, Hertford-Ware Area, and the M11 Stort corridor); and
 - functional policy areas which share similar characteristics (i.e. Rural Service Centres, Rural Area and North of Harlow)
- 2.4.4 The geographical definition of spatial areas is based on conceptions of internal consistency (i.e. what differentiates one spatial area from another) which suggest a particular approach to establishing the baseline. The goal of this SA is to assess the effects of the district's emerging LDF so the overarching question that will direct baseline data collection for each spatial area is: *"what are the significant characteristics which distinguish this spatial area from others and may be affected by the emerging LDF?"*
- 2.4.5 For example, the first three spatial areas are geographically defined by an internal coherence based on house prices, migration and travel to work data. Therefore, our attention in developing the baseline is drawn to information relating to these characteristics. It is important to note that these spatial areas have been developed solely as a means to add robustness to the SA and in no way do they pre-determine where development within the District may go. However, the inclusion of a particular settlement within a given spatial area will not limit the appraisal, but will be used to provide additional detail. For example, many villages lie outside the "Rural Area" spatial area, but will still be considered as part of Chapter 7 (Rural Area), as well as within other relevant spatial areas.
- 2.4.6 The proposed topics chosen to form the SA framework are:
- Air quality
 - Biodiversity and green infrastructure
 - Climate change (mitigation and adaptation)
 - Community and wellbeing
 - Economy and employment
 - Historic environment
 - Housing
 - Land
 - Landscape
 - Transport
 - Water
 - European sites

⁴ LCB (East) / M11 Housing Market Partnership (2009). *LCB (East) / M11 Draft Strategic Housing Market Assessment 2009*.

2.5 Integration of SA with other assessment and proofing exercises

- 2.5.1 The previous section sets out in detail our approach to undertaking the SA. This section provides the methodology for the integration of SA with the other assessment and proofing exercises (which should, as appropriate, include Equality Impact Assessment (EqIA), Health Impact Assessment and Rural Proofing). This section will also describe how this integrated approach will be applied at the Scoping and Assessment stages, as well as describing how the Scoping and SA Reports will be structured.

Habitats Regulations Assessment / Appropriate Assessment (HRA / AA)

- 2.5.2 Our methodology is consistent with the requirements of the *Planning and Compulsory Purchase Act 2004*, the *European Directive 2001/42/EC* (the “SEA Directive”) and the *Conservation (Natural Habitats, &c) (Amendment) (England and Wales) Regulations 2006* (*Habitats Regulations*). In practice there will be little integration between the SA and HRA / AA processes beyond the evidence gathering stage. In this Scoping Report we have included a **European Sites Topic Paper** that provides the methodology, evidence base and scope for the HRA / AA. See Chapter 20 European Sites.

Equality Impact Assessment (EqIA), Health Impact Assessment (HIA) and Rural Proofing

- 2.5.3 Methodologies promoted for stand-alone processes of EqIA, HIA and Rural Proofing tend to be closely comparable to the process set out in government guidance on SA. As a result, these assessment exercises can be relatively easily incorporated into the SA process.
- 2.5.4 This methodology will seek to promote best practice by incorporating a number of other assessment exercises. The concept of integrating other assessments into the SA process is outlined in CLG guidance⁵ and the new PPS12 adds further clarity, stating that: “Where authorities are required by law or encouraged by government policy to undertake assessments of their plans, such assessments should feed into and be summarised in the sustainability appraisal”.
- 2.5.5 Although SA can consider the full range of topics, the premise for integrating topic specific assessment exercises is to ensure that some topics receive the attention and prominence in the appraisal process that they warrant (given the plan context) and are given an appropriate level of consideration.
- 2.5.6 The incorporation of the other assessment exercises within this SA Report is through:
- The focus on collecting topic specific evidence, for example, the incorporation of EqIA and HIA evidence base in a **Community and Wellbeing Topic Paper** in this Scoping Report. See Boxes 1 and 2; and
 - **Rural Service Centres** and **Rural Area** have been included as spatial areas in this Scoping Report to aid assessment against these areas later in the SA. See Box 3.

⁵ CLG (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, HMSO, Wetherby.

Box 1: Equality Impact Assessment (EqIA)

EqIA aims to anticipate the effects of a plan on different groups within the community (equality target groups). A key driver for EqIA is the Equality Act 2006, which places statutory obligations on public sector organisations to ensure that all equality groups are not discriminated against within public sector service delivery and employment. The forthcoming Single Equality Bill 2009, a new streamlined public sector equality duty, is due to replace existing race, disability and gender equality duties and will be extended to cover all strands of discrimination, including measures to tackle socio-economic disadvantage.

Guidance on EqIA suggests a six-stage process of screening, scoping / defining, information gathering, making a judgement, action planning, and publication and review⁶. This very closely matches the SA process, but focuses on the needs of, and impacts on, specific groups and the differential nature and proportionality of impacts.

There are eight identified equality target groups, or equality strands, that are central to the equality agenda:

- race
- gender
- disability
- sexual orientation
- gender reassignment
- age
- religion and or belief
- socio-economic disadvantage.

We will follow the same process for the EqIA as we follow for the SA, i.e. we will prepare a topic paper 'Community and Well-being' that will include equality and diversity for inclusion in the Scoping Report and later ask how the options and preferred options / policies will impact on equality issues. The EqIA component in the topic paper in the Scoping Report will be organised around the eight equality target groups (and any others identified in discussion with the Council). The Council may decide to involve consultees and groups associated with EqIA in the Scoping Report consultation.

Box 2: Health Impact Assessment (HIA)

Health Impact Assessment (HIA) is an approach that ensures decision making at all levels considers the potential impacts of decisions on health and health inequalities. It identifies actions that can enhance positive effects and reduce or eliminate negative effects. HIA is a relatively new tool, and although there is no single agreed national approach or methodology, the value of HIA is increasingly being recognised, both nationally and internationally.⁷

Basic sequential steps involved in carrying out HIA can include:

- Screening
- Scoping
- Appraisal of the potential health effects/impacts
- Decision-making
- Monitoring and evaluation

HIA has been successfully integrated into the statutory process of SA and SEA undertaken for regional, sub-regional and local planning policy. In these instances the health input into policies has been strengthened.

⁶ Improvement and Development Agency (2008). *The EqIA process: six-step guide* [online] available at: <http://www.idea.gov.uk/idk/core/page.do?pageId=8017502> (accessed 16 September 2009).

⁷ London Health Commission (no date). *Health Impact Assessment* [online] available at: <http://www.london.gov.uk/lhc/hia/> (accessed 4 June 2009).

Box 3: Rural Proofing

“Rural proofing is the scrutiny of public service delivery, to ensure that impacts on rural areas are considered when implementing new initiatives.”

- Improvement and Development Agency, I&DeA

The Rural White Paper 2000 included a Government commitment to “*establish a rural proofing mechanism to ensure that all major policies are assessed for their rural impact*”. Government departments and Government Offices for the regions are required to report annually on how their policies have been rural proofed.

The former Countryside Agency developed a rural proofing checklist containing 15 questions which policy makers should ask of their initiative. These questions include, for example:

- **Will the policy affect the availability of public and private services?** Might it encourage closure or centralisation and will this have a disproportionate effect in rural areas where services are already limited?
- **Will the cost of delivery be higher in rural areas where clients are more widely dispersed or economies of scale are harder to achieve?** Will longer travel times or distances to clients add to the cost of service provision? Will services need to be run out of smaller outlets, so losing economies of scale?
- **Does the policy rely on infrastructure (e.g. broadband ICT, main roads, utilities) for delivery?** How will the policy work in rural areas, where the existing infrastructure is typically weaker

Each option / preferred option / policy will therefore be tested for its implications for rural areas using these questions as the basis, where appropriate.

2.6 Consultation on this Scoping Report

- 2.6.1 Consultation on the scope of the SA is a statutory requirement and is an essential part of the SA process. Consultation is important because it allows stakeholders to verify that all of the relevant plans, policies and programmes have been reviewed, to check that the most up-to-date baseline information has been included and to ensure the key sustainability issues have been identified.
- 2.6.2 This report was sent to the three Statutory Consultation bodies⁸ (Natural England, English Heritage and the Environment Agency). Other stakeholders were also consulted (for the full list of consultees see Appendix 1). The report was issued for formal consultation for a period of seven weeks. This document now incorporates responses to comments received. The comments received and responses to those comments are included in Appendix 2.

⁸ As required by Regulation 4(1) of the Environmental Assessment of Plans and Programmes Regulations 2004

3 A1(M) Corridor

3.1 Introduction

- 3.1.1 This chapter sets out for East Hertfordshire's A1(M) corridor the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

3.2 What's the policy context?

- 3.2.1 The A1(M) corridor has been defined on the basis of house prices, migration and travel to work data. Therefore, within East Herts the policy context which has most relevance to these elements is discussed below.
- 3.2.2 The East of England Plan designated Welwyn Garden City and Hatfield as a joint Key Centre for Development and Change (KCDC) within the London Arc. The strategy for the towns included overall housing growth of 10,000 by 2021 focused mainly at these towns and identification of urban extensions⁹. There is no numerical requirement within the RSS following a High Court ruling however, the outcome of the repair to the East of England Plan is currently not known. It is foreseeable that the figure of 10,000 (or higher or lower) could be reinstated for the area. Supportive text to the policy **LA3** noted that reconciling growth within the capacity constraints and pressures of the A1(M), A414 and the East Coast Main Line is a key challenge.
- 3.2.3 **Policy SVI** also identifies Stevenage as a KCDC with a strategy to develop Stevenage as a regional employment and housing growth point. This includes overall housing growth of 16,000 dwellings within and on the edge of the built up area by 2021 including sustainable urban extensions to the west of Stevenage. **Policy T15** requires further study of what improvements in capacity may be needed on the A1(M) and East Coast Main Line taking account of Local Development Document (LDD) level decisions on the scale of growth in different locations.

3.3 What are the key sustainability objectives that we need to consider?

- 3.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 - are relevant in considering future impacts on East Hertfordshire's settlements. Particularly relevant objectives include:
- Reduce greenhouse gas emissions
 - Promote employment, learning, skills and innovation
 - Move goods and people sustainably

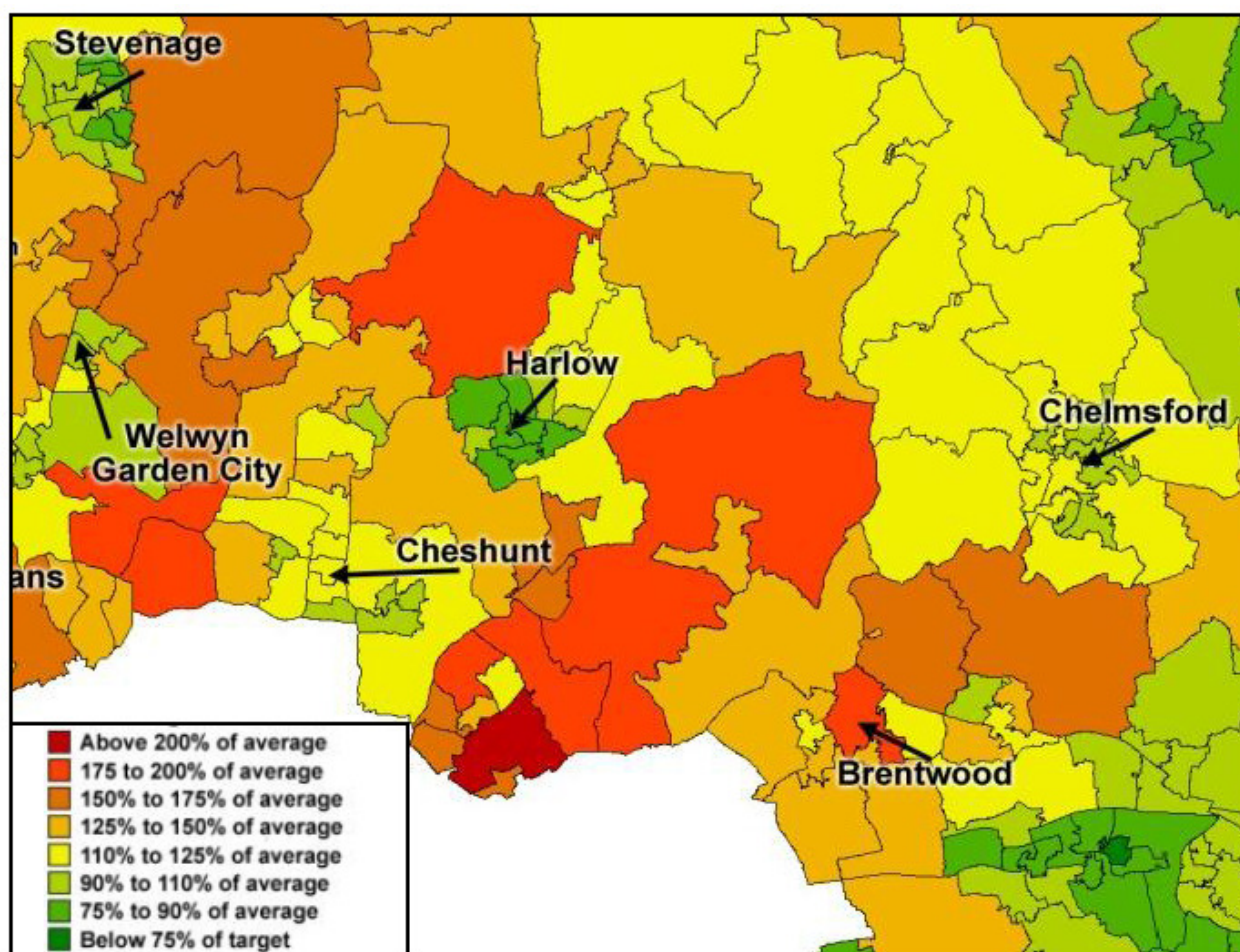
⁹ Following a High Court Challenge to the East of England Plan by St Albans Council and Hertfordshire County Council, a High Court Order (July 2009) quashed those policies within the East of England Plan ('the Plan') that provided for focused and substantial growth at Hemel Hempstead, Welwyn Garden City and Hatfield. It is Scott Wilson's understanding that these policies have been quashed because, in publishing them in the Plan the Secretary of State had failed to take account of reasonable alternatives as part of the process required by the SEA Directive and the regulations which transpose it into English Law. The quashed policies are currently being re-assessed as part of a 'Plan Repair' process. It is unclear what the implications of the Plan Repair will be for the districts in question or the rest of the East of England region.

- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all

3.4 What's the situation now?

- 3.4.1 The A1(M) corridor is found to the west of East Herts. It is primarily rural and includes the three villages of Walkern, Watton-at-Stone and Tewin. Walkern is to the east of Stevenage. Watton-at-Stone is southeast of Stevenage and is on the Hertford loop branch line between Hertford North and Stevenage. Tewin is northeast of Welwyn Garden City, north of the B1000 and the nearest train station is found at Digswell. The area is bordered to the west by the administrative boundary of East Herts and just to the west of this is the A1(M).
- 3.4.2 As shown in Figure 3, the A1(M) corridor is characterised by house prices which are over 150-175% the regional average and significantly higher than the urban area of Welwyn Garden City immediately to the west.

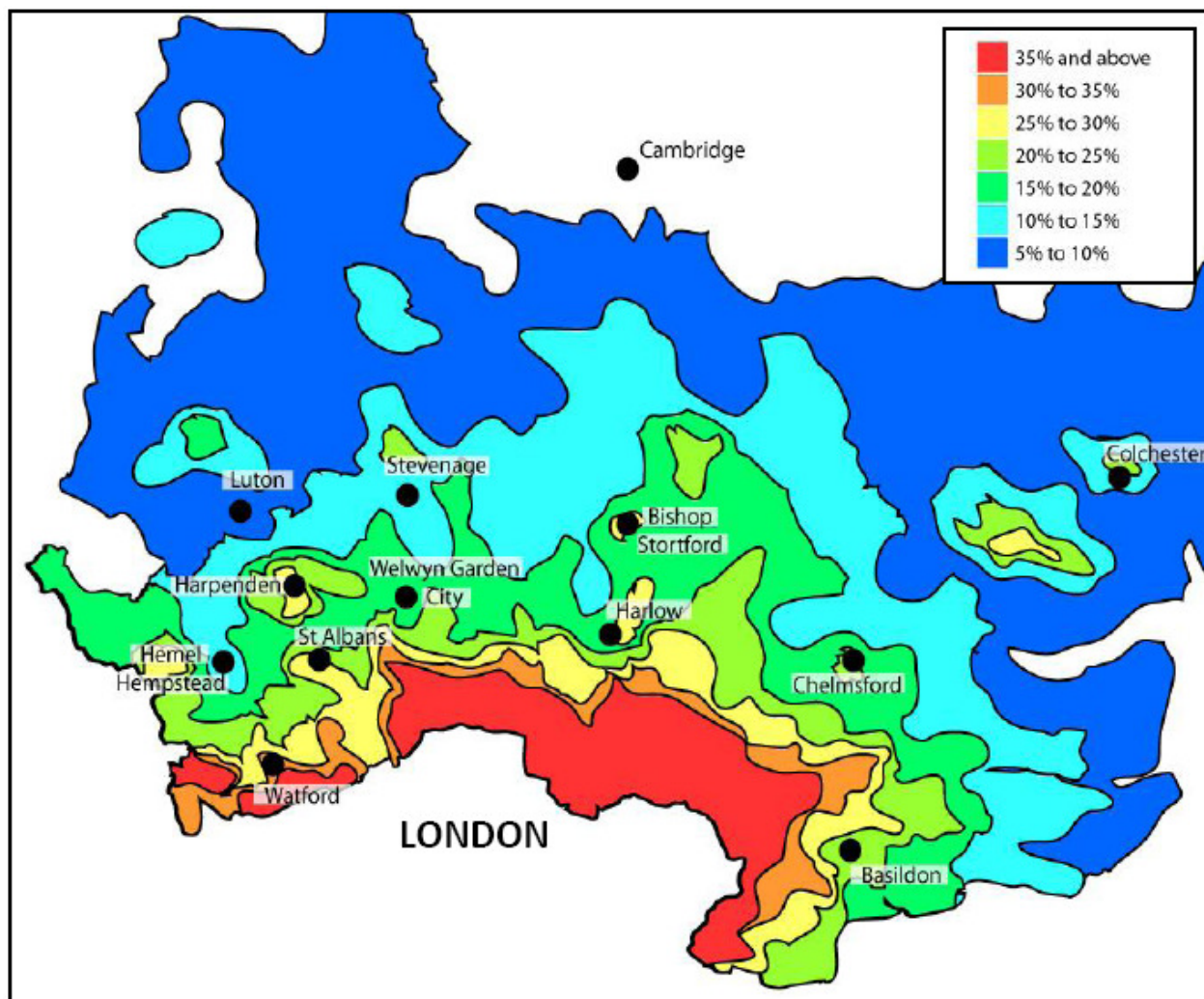
Figure 3: House prices in LCB (east)/M11 sub-region compared to Eastern region average¹⁰



¹⁰ LCB (East) / M11 Housing Market Partnership (2009). *LCB (East) / M11 Draft Strategic Housing Market Assessment 2009*.

- 3.4.3 In addition, while it is difficult to relate the absolute boundaries of the A1(M) corridor to Figure 4, the map does highlight the important role of London as a travel to work destination and that a high number of people within the eastern side of Hertfordshire do commute to London for work on a daily basis. For the A1(M) corridor the percentage of workers who commute to London is approximately between 10-20%.

Figure 4: Travel to work to London¹¹



- 3.4.4 In reference to the 2007 Indices of Multiple Deprivation (IMD) the area is relatively affluent and is amongst the least deprived in terms of the IMD Employment as well as the IMD Education Skills and Training domains. However, due partially to its rural nature and high house prices, the area is amongst the most deprived nationally in terms of IMD Access to Housing and Services¹² (i.e. ranking in the 20% most deprived LSOAs nationally).
- 3.4.5 **Watton-at-Stone:** with 1,267 employed residents and a workplace population of 511, 290 residents live and work in Watton-at-Stone but net out commuting is 756. As shown Figure 5,

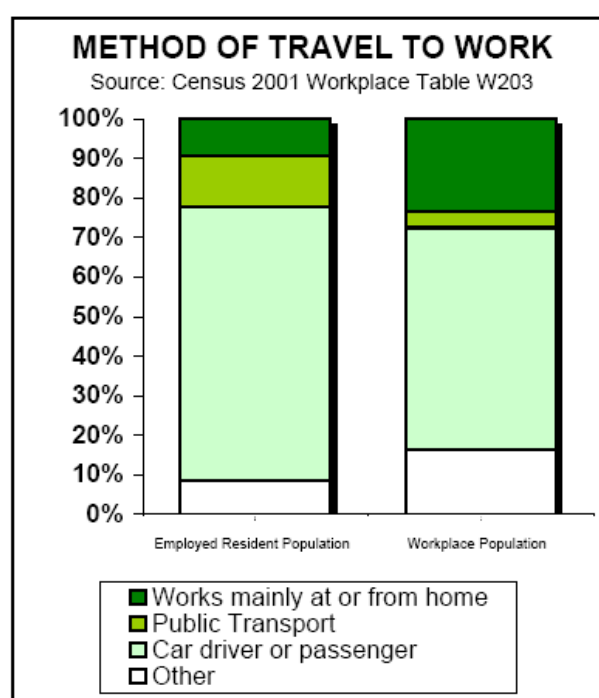
¹¹ LCB (East) / M11 Housing Market Partnership (2009). *LCB (East) / M11 Draft Strategic Housing Market Assessment 2009*.

¹² CLG (2007). *Indices of deprivation* [online] available at: <http://www.imd.communities.gov.uk/InformationDisplay.aspx> (accessed 26 August 2009).

approximately 70% use the car to get to work while only 13% rely on public transport. Approximately 52% of residents work in East Herts, 27% in the rest of Hertfordshire, 6% in the rest of the East of England, 13% in Greater London and 1% in other regions¹³. As could be expected, there are strong commuting relationships between Watton-at-Stone and the larger nearby settlements such as Hertford, Ware, Welwyn Garden City, Stevenage and Broxbourne.

- 3.4.6 While similar levels of travel-to-work statistics are not available through the rest of the A1(M) area they can reasonably be assumed to be consistent as this is one of the determining datasets through which HMAs are defined. Therefore, a serious concern for this area is the high levels of personal transport use that its population rely on for commuting purposes. Given that the majority of residents work in East Herts this suggests that outside of the main settlements with excellent transport links there is inadequate provision of public transport services to rural areas.

Figure 5: Method of travel to work



3.5 What will be the situation without the plan?

- 3.5.1 Without the plan it can reasonably be anticipated that high levels of out-commuting will continue from these small rural areas. High levels of personal car use would also continue thereby contributing towards the already congested road network of East Herts and the rest of Hertfordshire. It is unclear whether it would be possible for LDDs to significantly change this dynamic in a more positive way however, the present situation may not be sustainable.
- 3.5.2 In addition, without the plan the relationship between this area and the KCDC would evolve without appropriate steerage, leading to potentially unsustainable effects with regard to travel

¹³ EERA (no date). 2001 Census profile of Watton at Stone [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/cpwattonatstone.pdf> (accessed 26 August 2009).

patterns and even higher house prices. Without the plan the area would continue to experience extremely high levels of deprivation in terms of Access to Housing and Services.

3.6 What issues should be a particular focus for the appraisal?

3.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the A1(M) corridor include:

- Increasing more sustainable modes of transport
- Improving access to housing and services
- Housing affordability

4 Hertford-Ware Area

4.1 Introduction

- 4.1.1 This chapter sets out for the Hertford-Ware Area of East Herts the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

4.2 What's the policy context?

- 4.2.1 There are no regional plan policies which specifically target the Hertford-Ware area. Local Plan policies will be replaced by LDF policies. However, those regional policies significantly affecting the internal consistency which help to define this area are discussed below.
- 4.2.2 East of England Plan policy **HA1** identifies Harlow as a KCDC which includes the development of 16,000 dwellings at Harlow to 2021 including urban extensions in East Herts and Epping Forest. The East of England Plan designates Welwyn Garden City and Hatfield as a joint KCDC within the London Arc. The strategy for the towns includes overall housing growth of 10,000 by 2021 focused mainly at these towns and the identification of urban extensions. Supportive text to the policy **LA3** notes that reconciling growth within the capacity constraints and pressures of the A1(M), A414 and the East Coast Main Line is a key challenge.
- 4.2.3 Policy **SVI** also identifies Stevenage as a KCDC with a strategy to develop Stevenage as a regional employment and housing growth point. This includes overall housing growth of 16,000 dwellings within and on the edge of the built up area by 2021 including sustainable urban extensions to the west of Stevenage. Policy **T15** requires further study of what improvements in capacity may be needed on the A1(M) and East Coast Main Line taking account of LDD level decisions on the scale of growth in different locations.
- 4.2.4 Policy **T15** requires further study of what improvements in capacity may be needed on the A1(M) and East Coast Main Line taking account of LDD level decisions on the scale of growth in different locations.

4.3 What are the key sustainability objectives that we need to consider?

- 4.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 - are relevant in considering future impacts on East Hertfordshire's Hertford-Ware Area. Particularly relevant objectives include:
- Reduce greenhouse gas emissions
 - Promote employment, learning, skills and innovation
 - Move goods and people sustainably
 - Meet the needs of the changing regional demographic
 - Provide decent, affordable and safe homes for all

4.3.2 The Hertford and Ware UTP provides the following objectives for this spatial area:

- Transport should support new development and facilitate economic prosperity within Hertford and Ware;
- Transport should be integrated and reliable, allowing easy access to employment, leisure and key facilities and services for all;
- UTP schemes should be safe and efficient as possible and focus on encouraging less car use and promoting sustainable and healthy travel choices;
- The UTP should deliver value for money to local people;
- The UTP should improve the quality of life for residents and visitors alike; and
- The UTP programme should improve the local environment and respect the heritage of the study area.

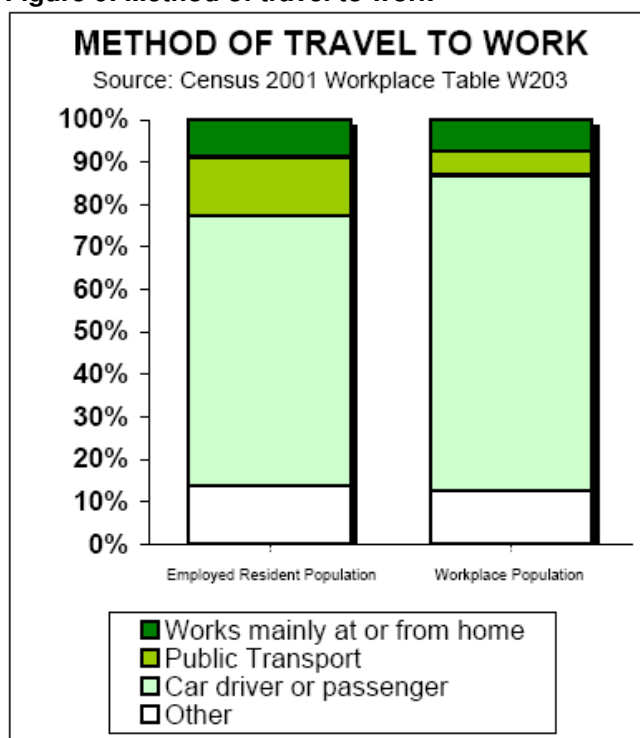
4.4 What's the situation now?

4.4.1 Hertford and Ware are two of the primary settlements within East Herts. They are connected by the A119 as well as the Hertford East branch of the West Anglia Main Line. They are characterised by relatively high levels of affluence and employment, high house prices and high levels of out commuting / poor levels of self-containment. Hertford and Ware have been considered as satellite settlements to Cheshunt based on the levels of commuting from these towns to Cheshunt¹⁴. However, as Cheshunt lies outside East Herts the focus of attention within this section is on the dynamics within and between Hertford and Ware.

4.4.2 **Hertford:** with 13,304 employed residents and a workplace population of 15,909, this town experiences 5,265 (approx. 40%) who live and work in Hertford. While this means that approximately 60% of residents commute outside the town for work there is still net in-commuting of 2,605. As shown in Figure 6, approximately 64% use the car to get to work while only 13% rely on public transport. However, 13% of residents commute either by foot or bicycle.

¹⁴ LCB (East) / M11 Housing Market Partnership (2009). *LCB (East) / M11 Draft Strategic Housing Market Assessment 2009*.

Figure 6: Method of travel to work

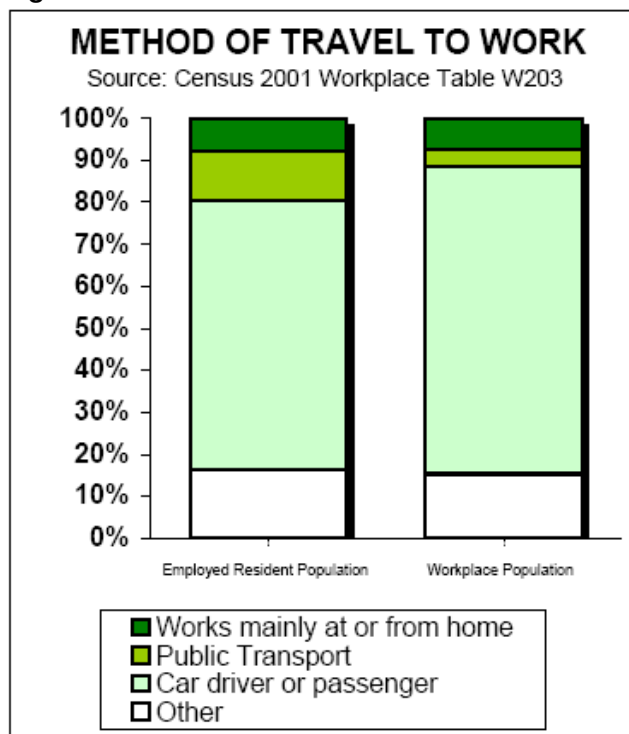


- 4.4.3 Approximately 51% of residents work in East Herts, 21% in the rest of Hertfordshire, 6% in the rest of the East of England, 19% in Greater London and 2% in other regions¹⁵. As could be expected, there are strong commuting relationships between Hertford and the nearby settlements such as Ware, Cheshunt, Hoddesdon, Welwyn, Stevenage, and Harlow.
- 4.4.4 **Ware:** with 9,221 employed residents and a workplace population of 9,625, this town experiences 3,371 (37%) who live and work in Ware. While this means that approximately 63% of employed residents commute outside of the town there is net in commuting of 404. As shown in Figure 7, approximately 64% use the car to get to work while only 12% rely on public transport. However, 14% of residents commute either by foot or bicycle¹⁶.

¹⁵ EERA (no date). *2001 Census profile of Ware* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/cphertford.pdf> (accessed 26 August 2009).

¹⁶ EERA (no date). *2001 Census profile of Ware* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/cpware.pdf> (accessed 26 August 2009).

Figure 7: Method of travel to work



- 4.4.5 Approximately 58% of residents work in East Herts, 18% in the rest of Hertfordshire, 7% in the rest of the East of England, 16% in Greater London and 1% in other regions¹⁷. As could be expected, there are strong commuting relationships between Ware and the larger nearby settlements such as Hertford, Broxbourne and Harlow¹⁸.
- 4.4.6 There is particularly heavy congestion between Hertford and Ware¹⁹. This is partially due to the 1,218 commuters travelling from Ware to Hertford who pass the 786 commuters travelling from Hertford to Ware everyday.
- 4.4.7 The Area Transport Plan for Hertford and Ware states that these historic market towns suffer from associated traffic and environmental problems, partly due to the central medieval street patterns²⁰.

4.5 What will be the situation without the plan?

- 4.5.1 There are significant areas of growth surrounding the Hertford-Ware Area with three nearby KCDCs bringing forward high levels of housing and employment. Hertford and Ware have strong functional relationships with these areas in terms of commuting and housing markets. It is difficult to assess what the situation will be without the plan but it can reasonably be assumed that without the appropriate policies in place, lower levels of containment would be experienced in the Hertford-Ware area given the greater selection and variety of jobs, services and

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Hertfordshire County Council (no date). *Walking and cycling maps* [online] available at: <http://www.hertsdirect.org/envroads/environment/countryside/walkingandriding/walkcyclemaps/> (accessed 26 August 2009).

²⁰ Hertfordshire County Council (2009). *Hertford and Ware UTP: Stage 1 Report* [online] available at: <http://www.hertsdirect.org/docs/pdf/f/HWutp09.pdf> (accessed 24 February 2010).

entertainment facilities that can be anticipated in the surrounding areas. This situation would further increase congestion within the area.

4.6 What issues should be a particular focus for the appraisal?

4.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the Hertford-Ware area include:

- Increasing more sustainable modes of transport
- Improving access to housing and services
- Housing affordability

5 M11 Stort Corridor

5.1 Introduction

- 5.1.1 This chapter sets out for East Hertfordshire's M11 Stort corridor the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

5.2 What's the policy context?

- 5.2.1 There is little policy context for the M11 Stort corridor *per se*, however, those policies significantly affecting the internal consistency which help to define this area are discussed below.
- 5.2.2 This area lies within the London-Stansted-Cambridge-Peterborough (LSCP) Growth Area and within that it also lies within the London-Harlow-Stansted programme area. The Sustainable Communities Plan established the Growth Areas as locations which would receive much of housing growth identified by the Government in July 2002. The LSCP is expected to deliver around 180,000 new homes between 2001 and 2016²¹.
- 5.2.3 East of England Plan Policy **HA1** identifies Harlow as a KCDC which includes the development of 16,000 dwellings at Harlow to 2021 including urban extensions in East Herts and Epping Forest. It designates Welwyn Garden City and Hatfield as a joint KCDC within the London Arc. The strategy for the towns includes overall housing growth of 10,000 by 2021 focused mainly at these towns and identification of urban extensions. Supportive text for Policy **E7: The Region's Airports** states that DPDs for East Herts should reflect the sustainability benefits of a growing number of airport employees living at towns close to the Airport.
- 5.2.4 The East of England Plan also notes the following scheme is currently programmed for funding through developer contributions :
- Stansted Airport Access Improvements form M11 and A120
- 5.2.5 This area lies within the Eastern Hertfordshire Area Plan which is a component of the Hertfordshire Local Transport Plan. The area plan encompasses a review of the existing Transportation Plans for Bishop's Stortford and Sawbridgeworth and contain action plans to tackle the specific transport related problems and issues in the area. Key issues identified as part of this review for Bishop's Stortford and Sawbridgeworth include the:
- Impact of increasing traffic volumes on bus services
 - Impact of commuter parking on local streets
 - Need to reduce the transport impacts on health by tackling vehicle emissions.
- 5.2.6 The Stort Valley is at the heart of the vision for the Green Infrastructure Network within the Harlow Area which encompasses the southern extent of the M11 Stort Corridor. In particular, the Stort Valley presents a major opportunity for developing a series of multi-functional and

²¹ Communities and Local Government (no date). *London Stansted Cambridge Peterborough* [online] available at: <http://www.communities.gov.uk/housing/housingsupply/growthareas/growthareasby/londonstanstedcambridge/> (accessed 27 August 2009).

connected green spaces, areas managed for wildlife and opportunities for access and recreation²².

5.3 What are the key sustainability objectives that we need to consider?

5.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 - are relevant in considering future impacts on East Hertfordshire's M11 Stort corridor. Particularly relevant objectives include:

- Reduce greenhouse gas emissions
- Promote employment, learning, skills and innovation
- Move goods and people sustainably
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

5.4 What's the situation now?

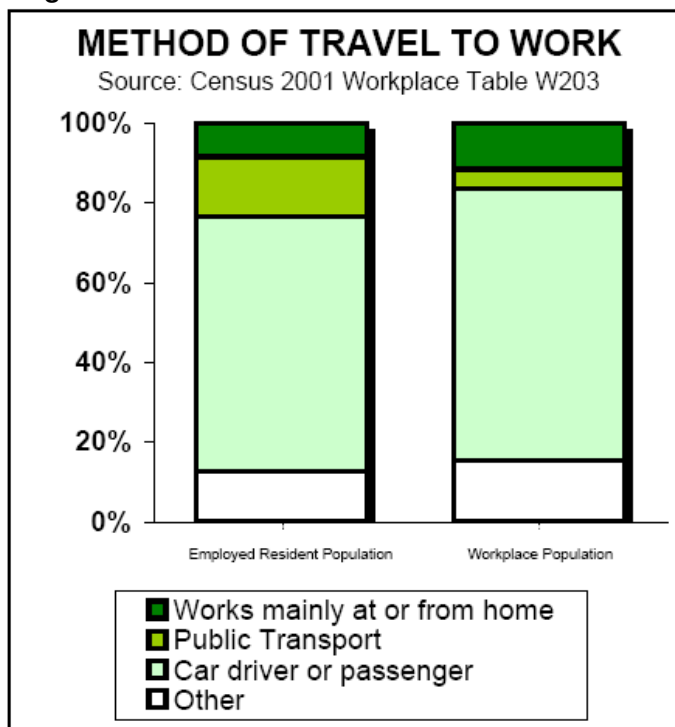
5.4.1 Within East Herts the M11 Stort corridor comprises the western extent of the larger Harlow and M11 HMA which covers parts of Uttlesford, Harlow and Epping Forest districts. Within East Herts the two primary towns are Sawbridgeworth and Bishop's Stortford which are to the west of the M11. These towns are joined by the A1184 and the West Anglia Main Line. The River Stort and the Stort Valley runs through this area on a north-south axis and is a critical component of the area's green infrastructure. The area is characterised by low levels of self-containment and house prices which are approximately 110% to 125% above the regional average (see Figure 3). These are significantly higher than in neighbouring Harlow but less than most of the rest of the district.

5.4.2 **Bishop's Stortford:** with 18,614 employed residents and a workplace population of 13,778, this town experiences 7,174 (39%) who live and work in Bishop's Stortford. While this means that approximately 61% of employed residents commute outside of the town there is overall net out commuting of 4,836. As shown in Figure 8, approximately 64% use the car to get to work while 15% rely on public transport. However, 11% of residents commute either by foot or bicycle²³.

²² Harlow District Council (2005). *Green infrastructure plan for the Harlow Area* [online] available at: <http://www.harlow.gov.uk/pdf/Part%201.pdf> (accessed 26 August 2009).

²³ EERA (no date). *2001 Census profile of Bishop's Stortford* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/cpbishopstortford.pdf> (accessed 26 August 2009).

Figure 8: Method of travel to work



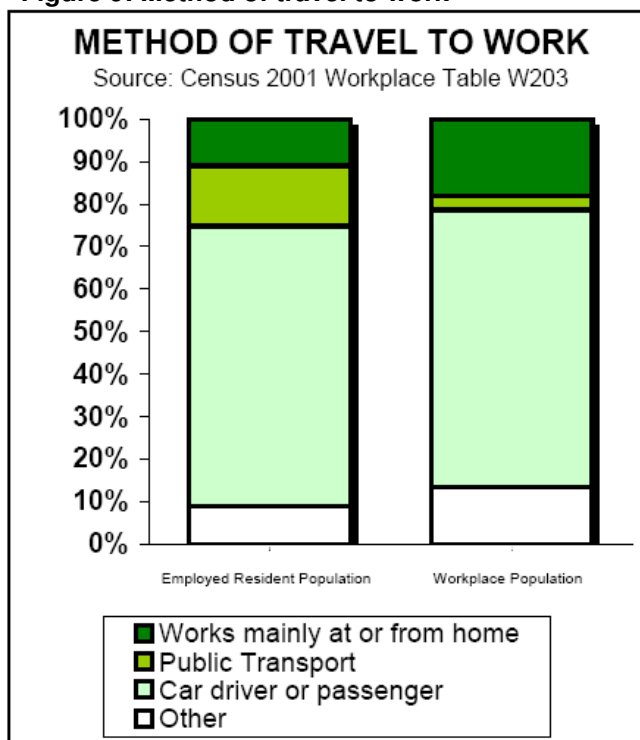
- 5.4.3 Approximately 46% of residents work in East Herts, only 5% in the rest of Hertfordshire, 29% in the rest of the East of England, 19% in Greater London and 2% in other regions²⁴. As could be expected, there are strong commuting relationships between Bishop's Stortford and the larger nearby areas such as Uttlesford, Harlow, and inner London. Additionally, 7.6% of residents travel to work at Stansted Airport²⁵.
- 5.4.4 **Sawbridgeworth:** with 4,187 employed residents and a workplace population of 2,537, this town experiences 1,092 (26%) who live and work in Sawbridgeworth. This means that approximately 74% of employed residents commute outside of the town leading to overall net out commuting of 1,650. As shown in Figure 9, approximately 66% use the car to get to work while 14% rely on public transport. However, 7% of residents commute either by foot or bicycle²⁶.

²⁴ EERA (no date). 2001 Census profile of Bishop's Stortford [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/cpbishopsstortford.pdf> (accessed 26 August 2009).

²⁵ Ibid.

²⁶ Ibid.

Figure 9: Method of travel to work



- 5.4.5 Approximately 40% of residents work in East Herts, only 5% in the rest of Hertfordshire, 34% in the rest of the East of England, 19% in Greater London and 5% in other regions²⁷. As could be expected, there are strong commuting relationships between Sawbridgeworth and the larger nearby areas such as Bishop's Stortford, Harlow, and inner London. Additionally, 3.3% of residents travel to work at Stansted Airport²⁸.
- 5.4.6 Travel patterns reveal that there are a high amount of residents who live in Bishop's Stortford and work in Sawbridgeworth and vice versa. This and the proximity of Bishop's Stortford to Stansted Airport helps contribute towards the high levels of congestion within Bishop's Stortford as shown in Figure 3.
- 5.4.7 The Green Infrastructure Plan²⁹ notes that

There are strategic opportunities to further enhance the connectivity and quality of the existing access and recreational resources, and to address deficiencies in access to public open space close to local communities in North Harlow and Sawbridgeworth through the creation of a linear Riverpark based on the Stort Valley

And furthermore:

This GIP [Green Infrastructure Plan] provides an exciting opportunity to deliver a new and bold vision for multi-functional landscapes that meets the needs of urban and rural communities in the Harlow Area. Epping Forest, Hatfield Forest, the Stort Valley and the Lee Valley lie at the heart of this vision. In particular, the Stort Valley presents a major

²⁷ EERA (no date). 2001 Census profile of Bishop's Stortford [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/cpbishopstortford.pdf> (accessed 26 August 2009).

²⁸ Ibid.

²⁹ Harlow District Council (2005). *Green infrastructure Study*.

opportunity for developing a series of multi-functional and connected green spaces managed for wildlife, access and recreation on Harlow's doorstep, which is readily accessible to other communities and visitors.

5.4.8 The River Stort becomes a canal at Bishop's Stortford and acts as the spine for the valley, creating a wildlife corridor and a scenic route for transport and recreation. In spite of the proximity to the M11 and Stansted Airport, the valley is rich with wildlife³⁰. There are several ongoing initiatives within this area including³¹:

- A local Primary Care Trust has agreed to develop a programme of health walks in this area;
- British Waterways has been awarded funding to upgrade a 2.4 km section of the towpath near Harlow, including many of the footpaths that connect to this stretch of the canal; and
- The Herts and Middlesex Wildlife Trusts have also been awarded funding for an outreach project working with local communities to encourage much greater use of the paths and sites along the Stort Valley.

5.5 What will be the situation without the plan?

5.5.1 Without the plan the increasing levels of congestion within the area are likely to continue, particularly given the high levels of planned growth in and around Harlow. It is likely that without appropriate planning of adequate employment facilities to provide for growth, particularly at Stansted Airport, the area will experience decreasing levels of self-containment, generating additional vehicle trips on the local road and motorway network.

5.5.2 While the Stort Valley remains remarkably unaffected by the M11, Stansted Airport and high levels of traffic on nearby roads, without the plan it is unlikely that this situation will remain. In addition, opportunities to maximise the Stort Valley's potential as part of the wider area's green infrastructure network will not be realised.

5.6 What issues should be a particular focus for the appraisal?

5.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the M11 Stort Corridor include:

- Increasing more sustainable modes of transport
- The need to address deficiencies in access to public open space near North Harlow and Sawbridgeworth through environmental enhancements
- Ensuring the environmental integrity of the Stort Valley is maintained and wildlife protected while maximising its potential as part of the wider green infrastructure network
- Achieving a sustainable urban extension to Bishop's Stortford to the north of the town

³⁰ Natural England (2009). *Green growth for green communities: a selection of regional case studies* [online] available at: http://www.naturalengland.org.uk/Images/GI%20case%20studies_tcm6-10331.pdf (accessed 28 August 2009).

³¹ Ibid.

- Ensure that the future development of Stansted Airport is reflected in development plans
- Housing affordability

6 Rural Service Centres

6.1 Introduction

- 6.1.1 This chapter sets out for East Hertfordshire's Rural Service Centres (RSC) of Buntingford and Puckeridge the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

6.2 What's the policy context?

- 6.2.1 PPS7: Sustainable Development in Rural Areas³² states that LDDs should facilitate and promote sustainable patterns of development and sustainable communities in rural areas. Policies should be designed to sustain, enhance and, where appropriate, revitalise country towns and villages (including through the provision of affordable housing) and for strong, diverse, economic activity, whilst maintaining local character and a high quality environment.
- 6.2.2 Away from larger urban areas, planning authorities should focus new development in or near to local (rural) service centres and these centres should be identified in the development plan as the preferred location for such development. In terms of economic development, local planning authorities should support a wide range of economic activity in rural areas by identifying suitable sites for future economic development and by setting out in LDDs their criteria for permitting economic development in different locations.³³ LDDs should also be used to:
- Facilitate and plan for accessible new services and facilities;
 - Where possible, ensure that new development in identified service centres is supported through improvements to public transport, and to walking and cycling facilities;
 - Support mixed and multi-purpose uses that maintain community vitality; and
 - Support the provision of small-scale, local facilities to meet community needs outside identified local service centres.³⁴
- 6.2.3 According to PPS7 planning authorities should also ensure that development respects and, where possible, enhances the considerable historic and architectural value that may be found in country towns and villages. Policies and guidance should be prepared to encourage good quality design throughout rural areas.
- 6.2.4 Policy **SS4: Towns other than Key Centres and Rural Areas** of the East of England Plan provides guidance on how LDDs should support the role of market towns and larger villages in providing employment and services to their rural hinterlands and meeting housing needs. Policy **E2: Provision of Land for Employment** provides a series of criteria to guide the distribution of employment sites in key rural centres.

³² ODPM (2004). *PPS7: Sustainable development in rural areas* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/147402.pdf> (accessed 23/07/09).

³³ Ibid.

³⁴ Ibid.

6.3 What are the key sustainability objectives that we need to consider?

6.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 - are relevant in considering future impacts on East Herts' RSC. Particularly relevant objectives include:

- Conserve, restore and enhance the region's natural and built environment
- Move goods and people sustainably
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

6.4 What's the situation now?

6.4.1 The RSCs in East Herts representing a distinct type of spatial area are Buntingford to the north of the district and Puckeridge which is approximately in the centre of East Herts.

6.4.2 Buntingford (population 5,000) is surrounded by open countryside on the River Rib. The centre of the settlement was improved in the late 1980s by the opening of the A10 bypass and through a programme of enhancement works. With respect to passenger transport, a limited local bus network exists from Buntingford to and from Stevenage, Bishop's Stortford, Hertford, Ware, Hitchin, Royston, Harlow and villages surrounding Buntingford³⁵.

6.4.3 Along with Ware and Sawbridgeworth, Buntingford tends to exhibit more traditional market town characteristics however; it is unusual in East Herts in that it is not located close to other towns and therefore assumes greater relative importance within the district as a service centre to the rural hinterland³⁶. The town centre retail offer includes two supermarkets as well as a range of independent and specialist shops.

6.4.4 Buntingford has a relatively low proportion of people in professional (11.2%) and associate professional / technical occupations (13.3%) and a relatively high proportion of process, plant and machine operatives (6.7%) and people in elementary occupations (10.4%). Almost a fifth of people (aged 16-24) are in managerial/senior official occupations (19.7%)³⁷.

6.4.5 The Retail and Town Centres Study³⁸ notes that catchments for food shopping in East Herts tend to be less extensive than for non-food shopping and that Buntingford retains a significant amount considering its size. Buntingford has two main stores within the town centre, Somerfield and Co-op which together account for 23% of the zone's (spatial nomenclature defined by the study) expenditure. However, the town retains a smaller proportion of shopping trips, particularly for main food shopping and in this regard are dominated by other centres. A large proportion of spend from Buntingford is attracted to Bishop's Stortford. Additionally, Buntingford does not have

³⁵ Local Plan 2007.

³⁶ East Herts District Council (2007). *Economic Development Strategy 2007 – 2012* [online] available at: http://80.168.51.108/media/pdf/0/6/Economic_Development_Strategy.pdf?bcsi_scan_F6892CABA15785B4=0&bcsi_scan_filename=Economic_Development_Strategy.pdf (accessed 28 August 2009).

³⁷ East Herts District Council (no date). *Ward Profiles: Buntingford* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=4461> (accessed 28 August 2009).

³⁸ East Herts District Council (2008). *Retail and Town Centres Study* [online] available at: http://80.168.51.108/media/word/s/5/East_Herts_Retail_Study_-_Final_-_August_2008.doc#_Toc206483245 (accessed 28 August 2009).

significant comparison goods offers and is dominated by the larger centres such as Stevenage, Bishop's Stortford and Welwyn Garden City.

- 6.4.6 The Retail and Town Centres study notes that Buntingford's role as a smaller centre is to provide essential services and convenience goods shopping to its catchment, which consists of its immediate environs. It fulfils a role that is closely akin to that of a district centre. There are very few vacant units (prior to the recession of 2008). The survey of businesses shows that there are perceived weaknesses in the accessibility of the town, both through inadequate public transport and car parking. The study concludes that Buntingford "*fulfils its role in the retail hierarchy and its both vital and viable.*"
- 6.4.7 Buntingford includes an employment cluster at the Sainsbury's Deport which is 9 ha³⁹. Buntingford Business Park is located directly on the A10 and is a new development with large, high-quality units. Park Farm industrial estate provides smaller, older units that cater for smaller businesses.
- 6.4.8 Puckeridge (population 2,500) is located within an area which retains its historical integrity in light of 20th century development however, its historical importance is not readily perceived in the wider landscape, rather retained in the settlements. It is situated in a generally open area, with extensive views. It is very tranquil away from the A120⁴⁰. The former separate villages of Standon and Puckeridge have coalesced and are now one settlement, located at the junction of the A120 and the A10 London to Cambridge road.
- 6.4.9 Puckeridge was classed by the East Herts Adopted Local Plan 2007 as a Category 1 Village. Supportive text for the East Herts Local Plan 1986-2001 (1999) notes that the settlement, like many others in East Herts suffers from considerable pressure for additional housing development⁴¹.

6.5 What will be the situation without the plan?

- 6.5.1 Without the plan there is a danger that the vitality of Buntingford may be diminished as a response to high levels of growth elsewhere in the region and the district. This could lead to the closure of local services, causing residents to travel further to meet their everyday consumer needs. Additionally, without the plan it may not be possible to support / manage appropriate levels of growth within RSCs, thereby leading to diminished character within these areas.

6.6 What issues should be a particular focus for the appraisal?

- 6.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the RSCs include:
- The need to manage the impacts of growth (particularly traffic) within the RSCs and their surrounding environs;
 - The maintenance and possible improvement of sustainable modes of transport

³⁹ East Herts District Council (2008). *Employment land and policy review* [online] available at: http://80.168.51.108/media/pdf/a/2/Employment_Land_and_Policy_Review_Oct_2008.pdf (accessed 28 August 2009).

⁴⁰ East Herts District Council (2004). *Landscape Character Assessment* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/area91rev.pdf> (accessed 28 August 2009).

⁴¹ East Herts District Council (1999). *East Herts Adopted Local Plan 1986-2001* [online] available at: http://80.168.51.108/media/pdf/l/q/16StandonPuckeridge_1.pdf (accessed 28 August 2009).

- Maintenance and viability of local facilities and services
- Maintenance and enhancement of the local distinctiveness and character of the individual settlements.

7 Rural Area

7.1 Introduction

- 7.1.1 This chapter sets out for East Hertfordshire's rural area the policy context; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

7.2 What's the policy context?

- 7.2.1 The policy context in Section 6.2 considering the implications of PPS7 is largely consistent for rural settlements and the countryside. However, in addition to policy direction for local service centres, PPS7 also includes policies which apply to the largely undeveloped countryside that separates cities towns and villages. PPS7 notes that while much of the land use planning in the countryside is outside the scope of the planning system, planning has an important role in supporting and facilitating development and land uses which enable those who earn a living from, and help to maintain and manage the countryside to continue to do so. Policies in LDDs should seek to maintain and enhance the environmental, economic and social value of the countryside, allowing these areas to remain an important natural resource, contribute to national and regional prosperity and be enjoyed by all.
- 7.2.2 PPS7 states that when preparing policies for LDDs and determining planning applications for development in the countryside, local planning authorities should:
- Support development that delivers diverse and sustainable farming enterprises;
 - Support other countryside-based enterprises and activities which contribute to rural economies, and/or promote recreation in and the enjoyment of the countryside;
 - Take account of the need to protect natural resources;
 - Provide for the sensitive exploitation of renewable energy sources in accordance with the policies set out in PPS22; and
 - Conserve specific features and sites of landscape, wildlife and historic or architectural value, in accordance with statutory designations.
- 7.2.3 PPS7 also includes criteria for the re-use of buildings in the countryside, policy guidance with regard to nationally designated areas and the role of LDDs in supporting development proposals that will assist farming and farmers. Key to this latter element is the recognition that diversification into non-agricultural activities is vital to the continuing viability of many farm enterprises and PPS7 includes guidance to local planning authorities in supporting this shift. Consideration in PPS7 is also given to the role of local planning authorities in supporting tourism and leisure activities which are vital to many rural economies.
- 7.2.4 The East of England Plan does not contain specific policy for rural areas (except with regard to transport) however, reference to development in rural areas is scattered throughout the Plan. Supportive text to Policy **SS4: Towns other than Key Centres and Rural Areas** states that the RSS seeks to locate the majority of new development in and adjacent to the key centres for development and change, and to protect the quality and character of the region's rural areas.

However, the policy also recognises the role of market towns and villages in providing employment and services to their rural hinterlands and meeting housing needs. The policy also recognises that there is an acute shortage of affordable housing in many rural areas. Therefore it is advised that effective use should be made of rural exemptions policies to deliver affordable housing. In addition, rural settlements, including small villages, may have local housing needs that can best be met at those settlements rather than concentrating all housing at towns and key service centres however, care should be taken to ensure new development is directed to locations where it will have the greatest benefits for rural sustainability. Policy **C1: Cultural Development** states that local authorities should recognise the contribution that cultural sectors can make to regeneration and rural renaissance. Policy **ENV6: the Historic Environment** notes that LPAs have an important role to play with regard to the historic environment and in particular the rural landscapes of the region, which are highly distinctive and of ancient origin.

- 7.2.5 Policy **T7: Transport in Rural Areas** recognises that rural areas have transport needs that are different from those of towns and cities. In rural areas priority should be given to providing sustainable access from villages and other rural settlements to market towns and urban areas.

7.3 What are the key sustainability objectives that we need to consider?

- 7.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 - are relevant in considering future impacts on East Hertfordshire's rural area. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Reduce poverty and inequality and promote social inclusion
- Reduce greenhouse gas emissions
- Adapt to the impacts of climate change
- Promote employment, learning, skills and innovation
- Conserve, restore and enhance the region's natural and built environment
- Move goods and people sustainably
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

7.4 What's the situation now?

- 7.4.1 East Herts has the most significant rural economic profile in the county. There are approximately 430 holdings in East Herts in total occupying 34,647 hectares. Many of these businesses have diversified and have a second income stream⁴².
- 7.4.2 The rural character of the district means that there is a significant agricultural base and approximately 70% of East Herts is classed as farmland⁴³. However, according to the 2001

⁴² East Herts District Council (no date). *The rural economy* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=4260> (accessed 28 August 2009).

Census this sector comprises only 1% of employment in the district⁴⁴. Agricultural land use in East Herts is shown in Table 3. Cereal production has been the main activity utilising 15,596 ha of land in 1995, compared to just 142 acres for potatoes production. However, the amount of land turned over to cereal production has dropped by 20% since 1998. Livestock rearing, particularly fowls, has risen dramatically over the same period with a 30% rise in the numbers of birds being reared between 1995 and 1998⁴⁵.

Table 3: Agricultural land use in East Herts⁴⁶

Land Type	% Use
Total crops and fallow	64
Set aside	12
Permanent grassland	12
Woodland	5
Recent and temporary grassland	2
Rough grazing	1
All other land	3

- 7.4.3 Approximately 30% of the district's population lives outside of the five main towns. This large and dispersed rural population has significant impacts on the provision of housing services. In the period 2003-2007 Registered Social Landlords built 14 new affordable homes in rural villages in East Herts⁴⁷.
- 7.4.4 In 2005, figures on entry level sales in the district show that sales prices for two and three bed terraced houses in rural areas are higher than the district wide average however; private sector rental prices for all types of properties are lower than the district wide average⁴⁸. This is reflected in the average Lower Super Output Area (LSOA) score for East Herts in terms of 2007 IMD Barriers to Housing and Services which is within the 20% most deprived nationally (with an average score of 19.04).

⁴³ East Herts District Council (no date). *Key statistics for East Herts: district level* [online] available at: http://80.168.51.108/media/pdf/9/k/DistrictLevel_1.pdf (accessed 14 September 2009).

⁴⁴ Ibid.

⁴⁵ East Herts District Council (no date). *Agriculture* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=1882> (accessed 14 September 2009).

⁴⁶ Ibid.

⁴⁷ East Herts District Council (2008). *Housing Strategy 2008 – 2011* [online] available at: http://80.168.51.108/media/pdf/2/2/Housing_Strategy_-_Consultation_document.pdf (accessed 14 September 2009).

⁴⁸ East Herts District Council (2005). *Housing Needs Survey Update 2005*.

- 7.4.5 East Herts retains much of its old rural landscape including woods and hedgerows, modern conifer plantations, 19th century oak woodlands and some going back to at least 1650⁴⁹. Historical travel patterns continue to impact the contemporary landscape as river crossings in rural areas typically include fords which now form a characteristic element in the valley landscapes⁵⁰.
- 7.4.6 As discussed in Chapter 18, bus and coach provision varies throughout the district. Regular bus services are available in some locations and there is a well-used bus station in Hertford, with improved passenger interchange facilities planned in Bishop's Stortford. There is currently unmet demand in other parts of the district and some rural pockets where a lack of transport leads to difficulties in accessing services. This contributes towards transport deprivation⁵¹. Additionally, in addition to the affluent nature of the district, its rurality also contributes towards high levels of private car use.

7.5 What will be the situation without the plan?

- 7.5.1 Without the plan the district's rural area is likely to maintain its high relative levels of affluence however, deprivation in terms of barriers to housing and services will continue to be high. In addition, without the plan the district may not be able to manage potential impacts of growth as provided by the East of England Plan both within East Herts and in the surrounding KCDC. These primarily relate to impacts from traffic congestion and pressure for housing on the landscape character and biodiversity within the district. Finally, without the plan economic diversification in rural areas may not be supported as well as it could be.

7.6 What issues should be a particular focus for the appraisal?

- 7.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the Rural Area include:
- The need to ensure that new development enhances the quality of life in rural areas
 - The need to support economic diversification
 - Housing affordability
 - Access to key facilities and services
 - The need to manage the impacts of rising traffic levels
 - Protection of rural landscape elements and character.

⁴⁹ University of London (no date). *Department of Geography: people* [online] available at: <http://www.geog.qmul.ac.uk/staff/wrightl.html> (accessed 14 September 2009).

⁵⁰ East Herts District Council (2007). *Landscape Character Area SPD*.

⁵¹ East Herts District Council (2009). *Draft spatial portrait*.

8 North of Harlow

8.1 Introduction

- 8.1.1 This chapter sets out for East Hertfordshire the policy context for the North of Harlow area; the key sustainability objectives that need to be considered, the situation now (including any problems); the situation without the plan (i.e. the business-as-usual scenario); and issues which we think should provide a particular focus for the appraisal of the Core Strategy and other DPDs.

8.2 What's the policy context?

- 8.2.1 The policy context for North of Harlow is primarily provided by the East of England Plan (2008). The Plan identifies Harlow as a key centre of development and change. The housing delivery targets up to 2021 are challenging and have been set at 16,000 dwellings (between 2001 and 2021) which represent a gross increase of 50% on current levels. The challenge is a function of both the numbers of dwellings that need to be provided, together with premises for new jobs, and what has to be achieved in order to attain an improved quality of life.

- 8.2.2 Significant levels of development may be located within North of Harlow. Policy **HA1** of the East of England Plan states that

Development Plan Documents should provide for a total of 16,000 additional dwellings between 2001 and 2021, including urban extensions in Epping Forest and East Hertfordshire districts. Additional housing should be provided [...]

- *Through urban extensions to the north, east and on a smaller scale the south and west.*

- 8.2.3 Furthermore, the policy includes provision for a green belt review to accommodate the urban extensions. This states that, *"the review to the north should provide for an eventual development of at least 10,000 dwellings and possibly significantly more – of a large enough scale to be a model of sustainable development."*

- 8.2.4 Policy E7 of the RSS states that employment development not directly related to Stansted Airport's operation should be located at Harlow and other nearby towns, identified through DPDs. Housing development related to employment growth at the Airport should be located at Harlow and nearby towns.

8.3 What are the key sustainability objectives that we need to consider?

- 8.3.1 Many of the objectives set out in the Integrated Regional Sustainability Framework for the East of England – see Table 2 - are relevant in considering future impacts on North of Harlow. Particularly relevant objectives include:

- Promote sustainable growth within environmental limits
- Reduce greenhouse gas emissions
- Adapt to the impacts of climate change

- Promote employment, learning, skills and innovation
- Increase resource efficiency and reduce resource use and waste
- Conserve, restore and enhance the region's natural and built environment
- Move goods and people sustainably
- Provide decent, affordable and safe homes for all.

8.4 What's the situation now?

- 8.4.1 Although there are no clearly defined boundaries to North of Harlow, indicative boundaries are shown in Figure 2. This area consists mainly of countryside that is used for agriculture, interspersed with areas of woodland. The River Stort is to the south and the A414 runs along the northern bank of the Stort. The main London Liverpool Street to Cambridge railway runs along the southern side of the Stort. There are three tributaries of the River Stort in North of Harlow including Fiddlers Brook, Pole Hole Brook and Eastwick Brook.
- 8.4.2 In terms of topography and landscape character the area is characterised by gently undulating agricultural land with woodland areas and interspersed farmsteads. The land form rises up from the River Stort to the Hunsdon Plateau. The area has a large scale arable field pattern which creates an open character across the flat upland plateau.
- 8.4.3 There are several small villages in North of Harlow including Eastwick, Hunsdon, Hunsdonbury and Gilston. The area also includes Hunsdon Airfield, a former RAF base, which includes number of grass runways that are used for micro-light flights. There are also a number of public footpaths and some minor roads which are predominantly found to the eastern and southern parts of the area.
- 8.4.4 A substantial portion of North of Harlow forms part of the Metropolitan Green Belt.
- 8.4.5 The area also includes a number of cultural / historic features such as Scheduled Ancient Monuments (moated sites and pill boxes, sleeping shelters and battle headquarters associated with Hunsdon Airfield) as well as listed buildings within Gilston and Eastwick. The area also includes remnants of historic parkland that was once part of Gilston Park and areas of archaeological potential.
- 8.4.6 In terms of deprivation (IMD 2007) the area generally ranks amongst the least deprived areas in England. The only exception is when the LSOAs which comprise North of Harlow are measured against the Barriers to Housing and Services Domain. Against this domain some of the LSOAs rank in the 10 to 20 percent most deprived reflecting both the rural nature of North of Harlow and high house prices.
- 8.4.7 There is a designated sand and gravel extraction site at Pole Hole.

8.5 What will be the situation without the plan?

- 8.5.1 Without the plan an appropriate planning framework would not be in place to deliver the required levels of housing within this area or to maximise the development opportunities which the scale of potential development may present with regard to elements such as green infrastructure. Additionally, without the plan it may not be possible to provide critical infrastructure such as

sewerage, transport and water supplies. Large scale development within North of Harlow that is not guided by an appropriate policy context may have greater negative effects on the character of existing settlements including their historic features, agricultural land, biodiversity and metropolitan green belt.

8.6 What issues should be a particular focus for the appraisal?

8.6.1 In light of the information above, key issues to take into account in the appraisal in relation to North of Harlow primarily relate to the strategic objectives included with Policy HA1 of the East of England Plan. These include:

- The enhancement and conservation of green infrastructure including the creation and maintenance of multi-functional greenspaces which should:
 - Maintain the principle of 'green wedges' penetrating the urban fabric of the town and urban extensions;
 - Provide for enhanced recreational facilities;
 - Protect and maintain designated wildlife sites and provide for biodiversity; and
 - Contribute to a visually enhanced character and setting to the town
 - Provide flood storage areas due to the flashy nature of the River Stort and the presence of flood zones within the wider North of Harlow area
- Achieve a major increase in the use of public transport, walking and cycling
- The need to ensure that impacts on the local and nearby strategic transport infrastructure are minimised.

8.6.2 Other key issues to take into account in the appraisal in relation to North of Harlow include:

- The need to give early consideration to landscape and biodiversity enhancement and woodland management
- The need to ensure that North of Harlow provides access to adequate employment opportunities, a range of community facilities and links to other centres and key services
- Protecting high quality agricultural land
- Housing affordability
- Ensure that the future development of Stansted Airport is reflected in development plans
- The need to give consideration to the inevitable green belt incursion in terms of green belt principles/purposes and wider green belt connectivity
- The need to ensure that the proposed sewerage network upgrade does not affect the UK Biodiversity Action Plan Priority Habitats at Hunsdon Mead SSSI⁵²
- Where possible there is a need to protect important historic environment assets and key aspects of historic environment character

⁵² Please refer to 8.38 in the Rye Meads Water Cycle Strategy and text on page 115 at www.eastherts.gov.uk/watercylce

9 Air quality

9.1 Introduction

- 9.1.1 The Government has a National Air Quality Strategy⁵³ to improve and protect ambient air quality in the UK in the medium-term. Improvements in air quality help meet health and biodiversity objectives, as well as helping to reduce greenhouse gas emissions.

9.2 What's the policy context?

- 9.2.1 At the European level, the Air Quality Framework directive (96/62/EC)⁵⁴ sets a strategic framework for tackling air quality consistently by setting European-wide limit values for twelve air pollutants in a series of daughter directives. The Government's Air Quality Strategy (2000)⁵⁵, required under the Environment Act (1995), sets out plans to improve and protect air quality in the UK. It considers ambient air quality only, leaving other aspects such as occupational, in vehicle and indoor air quality management to be addressed separately. Local authorities such as East Hertfordshire have statutory duties for local air quality management (LAQM) under the Environment Act 1995. They are required to carry out regular reviews and assessment against eight of the national objectives. Where it is found that objectives are unlikely to be met, local authorities must designate air quality management areas (AQMAs) to tackle the problem.
- 9.2.2 East Herts has completed the third round of review and assessment of air quality and in August 2005 they completed a Detailed Assessment. As a result of this assessment a new AQMA was designated at the Hockerill junction in Bishops Stortford based on exceedences of nitrogen dioxide (NO₂)⁵⁶ primarily caused by HGVs⁵⁷. This led the Council to produce a Further Assessment of the air quality 12 months after the designation and an Action Plan detailing measures that the Council anticipates taking to resolve the air quality issues within 18 months of the designation.
- 9.2.3 East Herts undertook an Air Quality Annual Progress Report⁵⁸ in 2008 which provides the latest monitoring results from the air quality monitoring stations located at Cutforth Road, Sawbridgeworth, and Eden's Mount, Sawbridgeworth. The results and implications of this report are discussed in Section 9.4.
- 9.2.4 Air quality issues should also be tackled by local authorities through spatial planning, local transport and controlling industrial pollution sources. The other two main organisations responsible for managing air quality are the Environment Agency, which is responsible for the regulation of emissions from industrial facilities and processes and the Highways Agency, responsible for managing motorways and trunk roads.

⁵³ Defra (2007) *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland* [online] available at: <http://www.defra.gov.uk/environment/airquality/strategy/pdf/air-qualitystrategy-vol1.pdf> (accessed 17 June 2009).

⁵⁴ EU (1996) *Council Directive 96/62/EC of 27 September 1996 on ambient air quality assessment and management* [online] available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31996L0062:EN:HTML> (accessed 17 June 2009).

⁵⁵ DEFRA (2007) *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland* [online] available at: <http://www.defra.gov.uk/environment/airquality/strategy/pdf/air-qualitystrategy-vol1.pdf> (accessed 16 June 2009).

⁵⁶ UK Air Quality Archive (no date). *East Hertfordshire DC* [online] available at: http://www.airquality.co.uk/laqm/laqm.php?action=submit&map_name=fulluk&la_id=89 (accessed 4 August 2009).

⁵⁷ East Hertfordshire District Council (2008). *Air Quality Progress Report* [online] available at: http://80.168.51.108/media/pdf/2/a/Air_Quality_Annual_Progress_Report_2008.pdf (accessed 4 August 2009).

⁵⁸ Ibid.

9.3 What are the key objectives and other decision-making criteria that we need to consider?

9.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

- Promote sustainable growth within environmental limits
- Reduce greenhouse gas emissions
- Move goods and people sustainably.

9.4 What's the situation now? (including any existing problems)

9.4.1 The results from the continuous air quality monitoring stations within East Herts show that the air quality objectives local authorities are required to meet were achieved in 2007. However, diffusion tube data shows that air quality objectives are unlikely to be met at two locations within the district. These locations are:

- Dunmow Road, Bishops Stortford
- London Road, Bishops Stortford.

9.4.2 Both of these locations are within the district's only AQMA and have been subject to an air quality Detailed Assessment.

9.4.3 In addition, a diffusion tube at West Street, Hertford exceeded the objective level in 2007 and the Council's Progress Report recommended that three diffusion tubes are collocated at this location to ensure more accurate data collection. On the basis of this recommendation an AQMA will be declared in Hertford (anticipated by March 2010). The Council has also received funding for carrying out a detailed assessment of the air quality in Ware near to Viaduct Road.

9.4.4 Ozone is monitored at Throcking, Buntingford and the objective level has been exceeded on several occasions. East Herts will continue to monitor at this location.

Are there any evidence gaps?

9.4.5 No evidence gaps have been identified.

9.5 What will be the situation without the plan? (the 'business-as-usual' option)

9.5.1 Without active intervention through the Core Strategy the situation will largely remain the same. While exceedences may continue to occur at a small number of sites a robust assessment and response process is enforced through European and UK legislation.

9.6 What issues should be a particular focus for the appraisal?

9.6.1 In light of the information above, key issues to take into account in the appraisal in relation to air quality include:

- The need to improve air quality in AQMAs and other areas exceeding air quality objective levels
- The need to ensure that inappropriate levels of development or activities which contribute towards lower levels of air quality are not located within inappropriate proximity to where air quality objectives have been exceeded or are approaching objective limits
- The need to ensure that future development does not lead to residents likely to be in an AQMA or subject to levels near to the air quality objective levels.

10 Biodiversity and green infrastructure

10.1 Introduction

- 10.1.1 Biodiversity is the term given to the diversity of life on Earth and this includes the plant and animal species that make up our wildlife and the habitats in which they live. As well as being important in its own right, we value biodiversity because of the ecosystem services it provides, such as flood defence and clean water; and the contribution that biodiversity makes to wellbeing and sense of place.
- 10.1.2 Green infrastructure is a network of multifunctional green spaces including formal parks, gardens, woodlands, green corridors (including river corridors and stretches of connecting habitat), street trees and open countryside. It can help to make walking and cycling more attractive; promote mental wellbeing; help to establish local identity and a sense of place; help to reduce air pollution; provide wildlife corridors for migration; access to strategic open spaces; contain flooding; and reduce temperatures at a time of global warming⁵⁹.

10.2 What's the policy context?

- 10.2.1 The EU Sustainable Development Strategy, adopted in 2006, includes an objective to halt the loss of biodiversity by 2010⁶⁰. The UK is also a Party to the Convention on Biological Diversity (CBD), a principal objective of which is the conservation of biodiversity. Commitment to the CBD led to the preparation of the 1994 UK Biodiversity Action Plan (UK BAP), the overall goal of which is to conserve and enhance biodiversity within the UK and to contribute to efforts to conserve global biodiversity. The UK BAP identifies our most threatened biodiversity assets and includes action plans for the recovery of priority species and habitats⁶¹. A Biodiversity Strategy for England was subsequently published in 2002⁶² and includes the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and enhance it wherever possible. PPS9 on Biodiversity and Geological Conservation emphasises that the Government's objectives for planning include ensuring that biodiversity is conserved and enhanced as an integral part of social, environmental and economic development, so that policies and decisions about the development and use of land integrate biodiversity with other considerations⁶³. Importantly, the Natural Environment and Rural Communities Act 2006 placed a Duty on public authorities to have regard to the conservation of biodiversity in exercising their functions. According to the Government, the Duty aims to raise the profile and visibility of biodiversity, clarify existing commitments with regard to biodiversity, and to make it a natural and integral part of policy and decision-making⁶⁴.

⁵⁹ Davies et al. (2006) *Green Infrastructure Planning Guide* [online] available at:

http://www.greeninfrastructure.eu/images/GREEN_INFRASTRUCTURE_PLANNING_GUIDE.pdf (accessed 17 July 2009).

⁶⁰ Council of the European Union (2006) *Renewed EU Sustainable Development Strategy* [online] available at:

<http://register.consilium.europa.eu/pdf/en/06/st10/st10917.en06.pdf> (accessed 17 July 2009).

⁶¹ For further information on the UK BAP see: <http://www.ukbap.org.uk/>

⁶² Defra (2002) *Working with the Grain of Nature: A Biodiversity Strategy for England* [online] available at:

<http://www.defra.gov.uk/wildlife-countryside/pdf/biodiversity/biostrategy.pdf> (accessed 17 July 2009).

⁶³ ODPM (2005) *Planning Policy Statement 9: Biodiversity and Geological Conservation* [online] available at:

<http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/historicenvironment/pps9/> (accessed 17 July 2009).

⁶⁴ Defra (2007) *Guidance for Public Authorities on Implementing the Biodiversity Duty* [online] available at:

<http://www.defra.gov.uk/wildlife-countryside/biodiversity/key-docs.htm> (accessed 17 July 2009).

10.2.2 The East of England Plan⁶⁵ contains several policies which provide a context for considering issues of biodiversity and green infrastructure. Policy **ENV1** states that LPAs should seek to secure the effective protection of the environment by considering the nature and location of proposed development as part of a broadly based concern for, and awareness of, biodiversity and other environmental assets. The policy provides specific policy for green infrastructure in which LDDs play an important role in identifying, creating, protecting, enhancing and managing areas and networks of green infrastructure. The policy also states that green infrastructure should be developed in part to maximise its biodiversity value. The Lea Valley Regional Park is identified as an area of landscape, ecological and recreational importance. Policy **ENV3: Biodiversity and Earth Heritage** requires planning authorities to ensure that the region's wider biodiversity, earth heritage and natural resources are protected and enriched through the conservation, restoration and re-establishment of key resources. With reference to the Harlow Area (which includes a portion of the southern part of East Herts district), LDDs should provide for the creation and maintenance of a network of multi-functional greenspaces around the town which take into consideration the principles of the Green Infrastructure Plan for Harlow.⁶⁶ The Stort Valley in particular is highlighted as a major green infrastructure opportunity between Harlow Town Centre and development to the north of Harlow within East Herts. This will have importance for leisure and recreation.

10.2.3 East Herts District Council is a formal signatory of the Hertfordshire Local Biodiversity Action Plan⁶⁷ which provides a framework for action by the Biodiversity Partners such as East Herts District Council.

10.3 What are the key objectives and other decision-making criteria that we need to consider?

10.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

- Promote sustainable growth within environmental limits
- Conserve, restore and enhance the region's natural and built environment.

10.4 What's the situation now? (including any existing problems)

10.4.1 The Council's website states that:

*East Herts is characterised by attractive rolling countryside. The small towns and villages stand in an area of great natural beauty, with winding country lanes and shallow valleys through which flow the many rivers and streams that criss-cross the district. [...] East Herts is much used by ramblers and has many peaceful riverside walks, boat travel on the rivers Lea and Stort and several nature reserves to visit.*⁶⁸

⁶⁵ EERA (2008). *East of England Plan* [online] available at:

http://www.gos.gov.uk/goe/docs/Planning/Regional_Planning/Regional_Spatial_Strategy/EE_Plan1.pdf (accessed 4 August 2009).

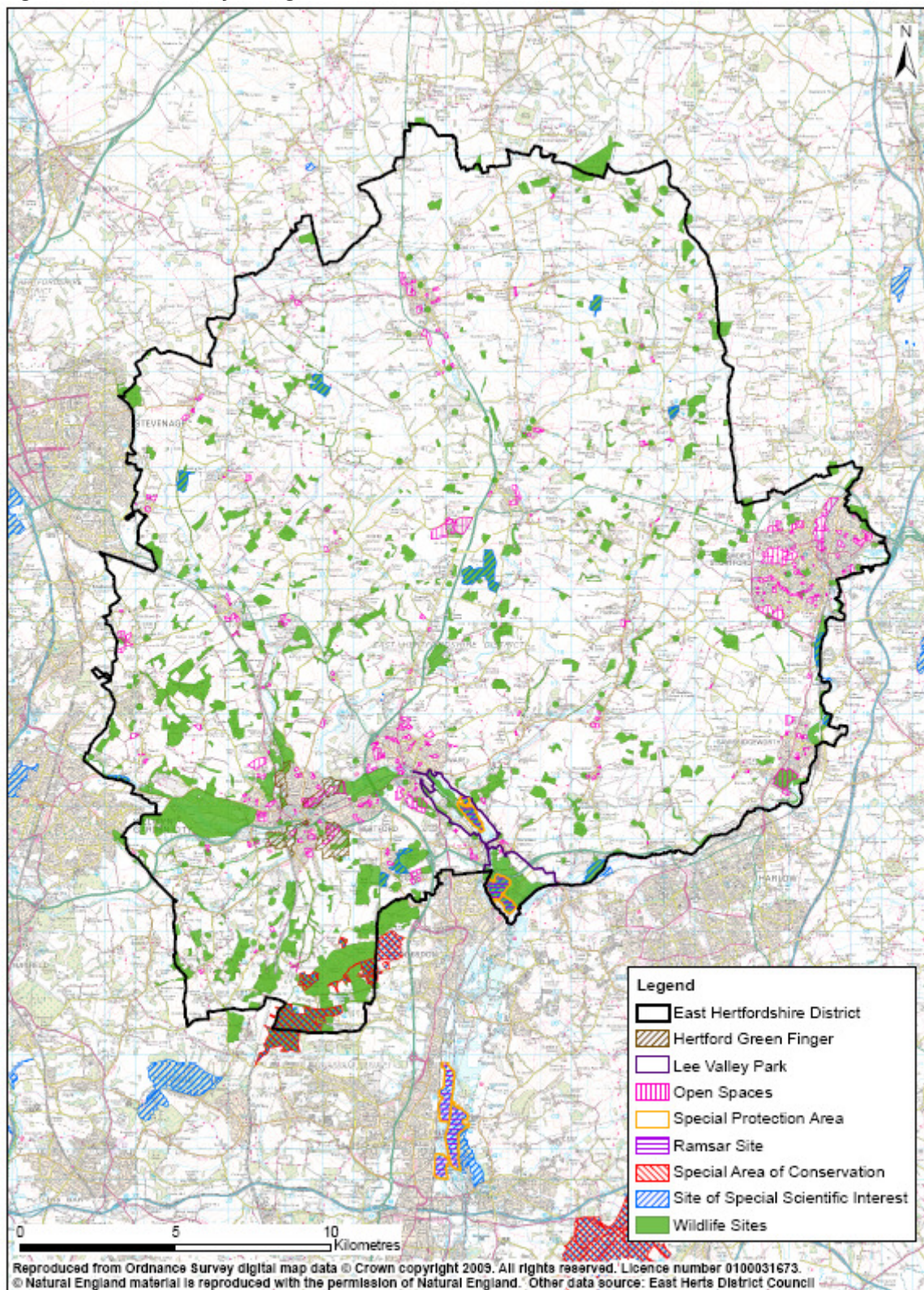
⁶⁶ Harlow District Council (2005). *A green infrastructure plan for the Harlow Area* [online] available at:

<http://www.harlow.gov.uk/default.aspx?page=8615> (accessed 4 August 2009).

⁶⁷ Herts and Middlesex Wildlife Trust (1998 revised 2006). *A 50-year vision for the wildlife and natural habitats of Hertfordshire: a local biodiversity action plan* [online] available at: http://www.hef.org.uk/nature/biodiversity_vision/index.htm (accessed 4 August 2009).

⁶⁸ East Hertfordshire District Council (no date). *The East Hertfordshire Environment* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=1884> (accessed 4 August 2009).

Figure 10: Biodiversity and green infrastructure within East Herts



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10.4.2 The spatial distribution of statutory habitat designations and some key non-statutory environmental designations within and around East Herts is shown in Figure 10. Areas of nature conservation are abundant within the district. There are two areas that are of international importance. These are Rye Meads, in the Lee Valley Regional Park and Wormley-Hoddesdonpark Wood⁶⁹. There are also three sites of international importance comprising one Special Protection Area (SPA), a RAMSAR site and a candidate Special Area of Conservation (SAC).⁷⁰ There are 15 nationally important SSSIs and around 500 other wildlife sites of regional or local importance. Table 4 summarises some of the key areas. The district also includes Hertford's Green Fingers⁷¹ around the town's urban fringe which penetrates towards the centre of the town. This is an environmental concept which seeks to retain major areas of undeveloped land.

Table 4: Nature conservation interests in East Hertfordshire⁷²

Site	Designation	Features	SSSI Assessment Description
The Lee Valley	SPA	Bitterns, Shoveler and Gadwall	
	SSSI	Wintering wildfowl	Favourable
	Ramsar	Water milfoil, Water boatmen, Shoveler and Gadwall	
Wormley Hoddesdonpark Woods North / South	SAC	Oak hornbeam woods	
	SSSI	Oak hornbeam woods	Favourable and Unfavourable ⁷³
The Broxbourne Woods	NNR	Oak hornbeam woods	
Tewinbury	SSSI	Alluvial meadows and marshes	Unfavourable recovering
Patmore Heath	SSSI	Dry grass heathland	Unfavourable recovering

⁶⁹ East Herts District Council (2009). *Appendix 1. evidence base for East Herts Sustainable Community Strategy April 2009* [online] available at: http://www.eastherts.gov.uk/media/word/m/2/Sustainable_Community_-_Appendix_A_Table_7_V7.doc (accessed 14 August 2009).

⁷⁰ East Hertfordshire District Council (no date). *The East Hertfordshire Environment* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=1884> (accessed 4 August 2009).

⁷¹ Hertford's Green Fingers are designated on the Local Plan Proposals map and wording to this effect is provided in the Local Plan at Paragraph 12.6.1. However, in her report on the Local Plan Second Review (adopted 2007) the Inspector recommended deletion of policy reference to the Green Fingers because they do not provide a recognised criteria-based land use policy: "I am conscious of the level of work that has been carried out by the local community and amenity groups to ensure the identification and protection of these areas. Rather than undermine the process of local participation by recommending deletion of the Green Fingers, I am inclined to retain the local designation for the period of this Plan. However, its future retention must be seriously considered during the forthcoming LDF process, in collaboration with the local community and stakeholders." (12.20.4) In accordance with this, the Council intends to re-examine the Green Fingers through the emerging LDF. The Green Fingers, as with other similar designations such as Bishop's Stortford Green Wedges, are covered by the overall PPG17 typology.

⁷² Natural England (2009). *Condition of SSSI units* [online] available at: <http://www.english-nature.org.uk/special/sssi/reportAction.cfm?Report=sdrt13&Category=C&Reference=1021> (accessed 4 August 2009).

⁷³ The SSSI has been broken down into several units. Whilst the majority of the units are listed in favourable condition, one is listed as unfavourable.

Site	Designation	Features	SSSI Assessment Description
Rye Meads	SSSI	Ancient flood meadows, breeding tufted duck and common tern	Favourable
	SPA (proposed)	Bitterns, Shoveler, Gadwell and wintering wildfowl	
Plashes Wood	SSSI	Oak and Hornbeam woodland	Unfavourable recovering
Moor Hall Meadows	SSSI	Grazing meadows and grassland species	Unfavourable declining, unfavourable no change, favourable
Great Hormead Park	SSSI	Ancient woodland	Unfavourable recovering
Hillcollins Pit	SSSI	Westland Green Gravel site	Favourable
Hunsdon Mead	SSSI	Ancient flood meadows	Unfavourable no change
Hertford Heath	SSSI	Lowland heath	Unfavourable recovering, favourable
Downfield Pit	SSSI	Pleistocene gravels	Favourable
Benington High Wood	SSSI	Pedunculate Oak Hornbeam woodland of the Ash Maple Variety	Unfavourable recovering
Sawbridgeworth Marsh	SSSI	River valley marsh	Favourable
Thorley Flood Pound	SSSI	Flooding marsh habitat	Unfavourable declining

10.4.3 There is an absence of data with regard to habitat change of international, national, regional and sub-regional sites within East Herts district however, the Hertfordshire Biological Records Centre (HBRC) and Hertfordshire County Council are taking steps to improve this element of monitoring. HBRC does supply the number and area of Wildlife Sites on an annual basis. In 2006/07 there was 4,593 ha, decreasing to 4,531 in 2007/08 on 609 wildlife sites in the district. While this fails to meet the stated target of less than a 10ha reduction per year alterations are primarily due to a comprehensive boundary review as recorded on the electronic mapping database held by HBRC. As such, the changes are back in line with previous monitoring year records.

10.4.4 Provisional Key Biodiversity Areas (KBAs) have been identified in East Herts through an examination of known habitat data⁷⁴. The concept of targeting these areas for prioritised conservation action is because they represent concentrations of important habitats and provide

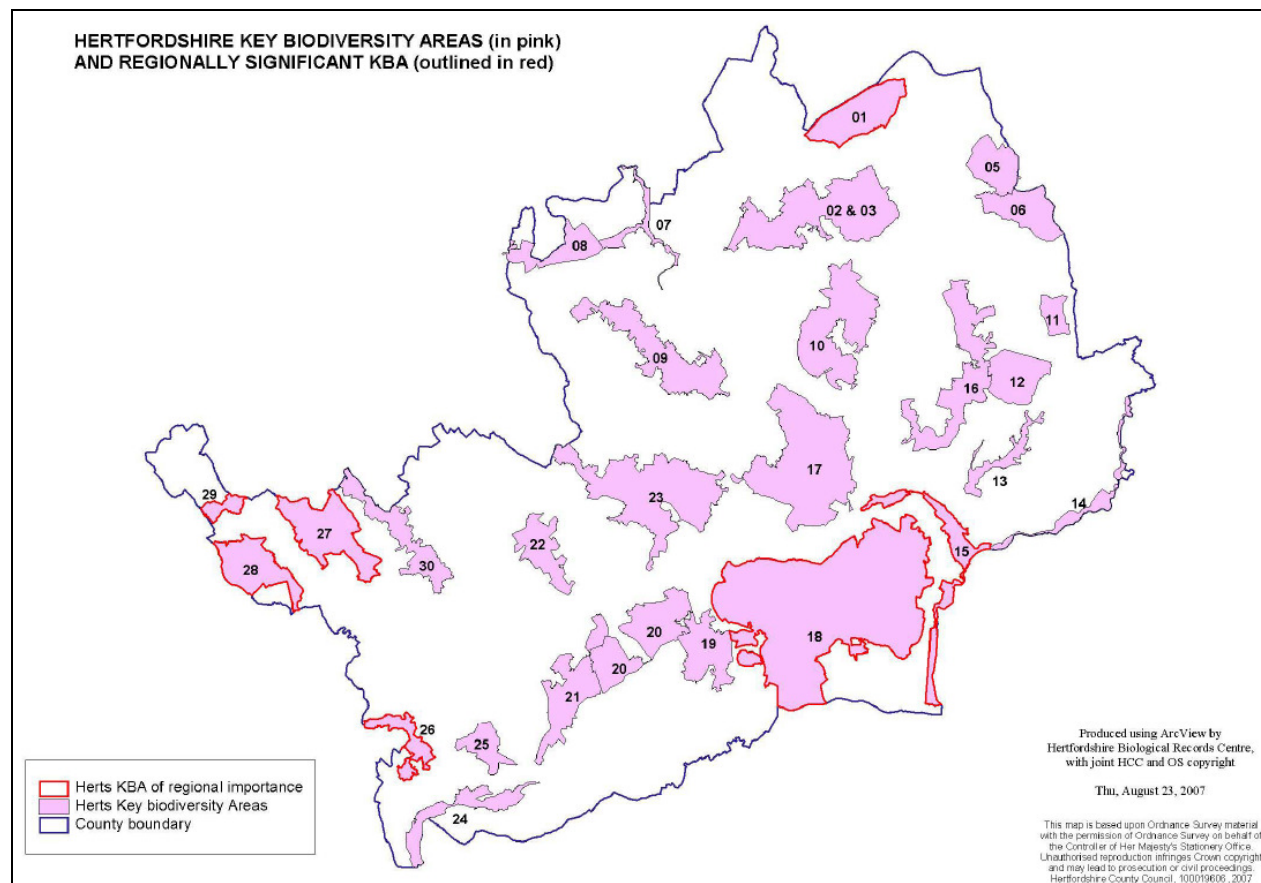
⁷⁴ This is in lieu of current information on notable species which requires adequate resourcing.

new opportunities for biodiversity delivery, along with benefits for people, the economy and the environment. 10 KBAs have been identified within East Herts⁷⁵ (shown in Figure 11) and include:

- Scales Park/Meesden/Beeches Wood (6)
- Cottered/Ardeley/Benington (10)
- Patmore Heath/Upwick Green (11)
- Wellpond Green/Westland Green (12)
- River Ash Valley (13)
- Stort Valley (14)
- Lea Valley (15)
- Rib Valley (16)
- Lower Mimram/Lower Beane/Bramfield Plateau (17)
- Broxbourne Woods/Hatfield Park (18)

⁷⁵ These KBAs are subject to change and evolve as a result of current work being promoted by Natural England under the banner of 'Securing Biodiversity'. The framework aims to enhance the recovery of priority habitats and species in England under Section 41 of the Natural Environment and Rural Communities Act 2006.

Figure 11: Key Biodiversity Areas in Hertfordshire⁷⁶



10.4.5 In addition to a number of BAP habitats that are important from a County perspective, the Hertfordshire Biodiversity Action Plan (BAP) identifies the following key habitats, of which there is a significant proportion of the UK resource in Hertfordshire⁷⁷. Therefore the County has a special responsibility for these habitats and they are a priority for action:

- Chalk rivers
- Lowland Beech woods
- Oak-Hornbeam Woodland⁷⁸

10.4.6 The Hertfordshire BAP⁷⁹ also identifies the following UK priority species where Hertfordshire can contribute to the achievement of national targets because the species are characteristic of the area. These are shown in Table 5.

⁷⁶ Herts & Middlesex Wildlife Trust (2007). *A 50 year vision – biodiversity action plan for Hertfordshire* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/kba.pdf> (accessed 24 February 2010).

⁷⁷ Herts & Middlesex Wildlife Trust (2006). *A 50 year vision – biodiversity action plan for Hertfordshire* [online] available at: http://www.hef.org.uk/nature/biodiversity_vision/chapter_03_habitat.pdf (accessed 24 September 2009).

⁷⁸ Added as a result of a consultation response from the Hertfordshire Biological Records Centre

⁷⁹ Herts & Middlesex Wildlife Trust (2006). *A 50 year vision – biodiversity action plan for Hertfordshire* [online] available at: http://www.hef.org.uk/nature/biodiversity_vision/chapter_03_habitat.pdf (accessed 24 September 2009).

Table 5: UK Priority species identified for Hertfordshire

Brown Hare	Otter	Water Vole
Grey Partridge	Song Thrush	Bullfinch
Linnet	Spotted flycatcher	Turtle Dove
Stag Beetle	Thatch Moss	Cornflower
Dormouse	Pipistrelle	Bittern
Skylark	Stone Curlew	Corn Bunting
Reed Bunting	Tree Sparrow	Great Crested Newt
White-clawed Crayfish	Shepherd's Needle	Corn Cleavers
Purple Emperor Butterfly	Black-necked Grebe	

- 10.4.7 Research⁸⁰ has shown that generally East Herts has enough open space and that the rural geography of the area means that open countryside surrounds all settlements. As a result of the large amount of countryside and green belt throughout the district there is a vast network of pathways and walks. Table 6 illustrates the breakdown of the total number of open space sites within East Herts.

Table 6: Open space in East Herts by typology

Type	Number of sites	Comment
Parks and gardens	9	Ranges from large parks such as Pishiobury in Sawbridgeworth to small formal gardens such as Layston Court Gardens in Buntingford
Natural and semi-natural greenspace	106	Includes Balls Wood in Hertford, Red, White and Blue in Bishop's Stortford and Amwell Quarry Nature Reserve in Great Amwell. District is well provided for.
Amenity greenspace	87	Generally centred in the main towns and in larger rural villages. District is well provided for although there is an uneven distribution.
Provision for children and young	106	Mainly consists of council-owned play areas within the main villages and towns

⁸⁰ East Herts District Council (2005). *PPG17 Audit and Assessment* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=1960> (accessed 4 August 2009).

Type	Number of sites	Comment
people		
Outdoor sports facilities	170	Includes a large number of golf courses; the majority of sites are of good quality and accessibility
Allotments	33	Relatively well provided for and all major towns and the larger villages have allotments
Cemeteries and Churchyards	47	Range in size
Green corridors	8	These have been identified as major footpaths within the district and they are well valued by residents.
Total	566	

Are there any evidence gaps?

10.4.8 Evidence gaps include:

- Status of priority species
- Some SSSI condition data as shown in Table 4
- Habitat change of international, national, regional and sub-regional sites within the district.

10.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 10.5.1 Without active intervention through the Core Strategy it is not clear whether the green infrastructure requirements described by the East of England Plan will be met. In particular, it is uncertain whether green infrastructure opportunities would be maximised as part of new development throughout the plan period. Indeed, reflecting the recent popularity of the green infrastructure concept it is not included within the Adopted Local Plan 2007⁸¹.
- 10.5.2 Arguably, there may not be the same degree of emphasis on biodiversity without the intervention through the Core Strategy. As a result it is conceivable that many of the SSSIs identified as unfavourable or declining would remain in this condition with negative effects on biodiversity. The acceptable provision of open spaces within the district would likely remain without the plan.

⁸¹ Although key elements of green infrastructure, e.g. waterways, parks, etc. certainly are.

10.6 What issues should be a particular focus for the appraisal?

10.6.1 In light of the information above, key issues to take into account in the appraisal in relation to biodiversity and green infrastructure include:

- The need to ensure that development does not negatively impact upon designated nature conservation sites including key biodiversity areas, habitats and species (informed by the Hertfordshire BAP) and other recognised sites of nature conservation importance, including Wildlife Sites;
- The need to protect and enhance sites of importance for wildlife; both statutory and non-statutory;
- In areas of substantial development (e.g. north of Harlow) there is careful consideration for the incorporation of green infrastructure features
- Consideration is given to multi-functional green spaces which transcend the administrative boundaries of East Herts.

11 Climate change (mitigation and adaptation)

11.1 Introduction

11.1.1 Climate change has become a key issue. Lord Nicholas Stern has suggested that, worldwide, climate change could reduce GDP by 20% unless it is actively tackled now⁸². According to the 2009 UK Climate Projections⁸³:

- All areas of the UK will get warmer (with the warming greater in summer than in winter).
- There is little change in the amount of precipitation (rain, hail, snow etc) that falls annually, but it is likely that more of it will fall in the winter, with drier summers, for much of the UK.
- Sea levels rise (greater in the south of the UK than the north).

11.1.2 As a result, there will be permanent changes in the natural environment and increasingly, substantial challenges to national prosperity and social cohesion at the local level. The Government's principal concern for sustainable development has now filtered down to local authorities and climate change mitigation is being encouraged through promoting measures to reduce greenhouse gas emissions.

11.1.3 Government guidance on flood risk emphasises that although flooding cannot be wholly prevented, its impacts can be avoided and reduced through good planning and management. As a consequence of climate change, the Pitt Review into the 2007 floods emphasised that flood risk is here to stay. Flooding from all sources is expected to increase with climate change.

11.2 What's the policy context?

11.2.1 The Climate Change Act 2008⁸⁴ sets targets for green house gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline. The East of England Plan states that to help meet national targets for reducing climate change emissions DPDs should set ambitious proportions of the energy supply that new developments must secure through decentralised and renewable or low-carbon sources. Additionally, until these DPDs are set "new development of more than 10 dwellings or 1000m² of non-residential floorspace should secure at least 10% of their energy from decentralised and renewable or low-carbon sources, unless this is not feasible or viable." By 2010, 10% of the region's energy and by 2020, 17% of the region's energy should come from renewable sources. Hertfordshire has set a county-wide target of 9.1% reduction in CO₂ emissions by 2001/12⁸⁵.

⁸² Stern, N. (2006) *Stern Review on the economics of climate change* [online] available at: http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/stern_review_report.cfm (accessed 23 June 2009).

⁸³ Defra (2009) *UK Climate Projections* [online] available at: <http://ukcp09.defra.gov.uk/> (accessed 16 July 2009).

⁸⁴ The Climate Change Act 2008 is available at: <http://www.defra.gov.uk/environment/climatechange/uk/legislation/> (accessed 17 July 2009).

⁸⁵ East Herts District Council (2009). *Climate change* [online] available at: <http://www.eastherts.gov.uk/climate> (accessed 4 August 2009).

- 11.2.2 PPS1 supplement on Planning and Climate Change⁸⁶ requires local authorities to mitigate and adapt to climate change through appropriate location and patterns of development, promoting the reduction of the use of the car, conserving and enhancing biodiversity and ensuring that new development is resilient to the effects of climate change. PPS22 on Renewable Energy⁸⁷ includes a requirement for local authorities to allocate specific sites for renewable energy and to encourage developers to provide on-site renewable energy generation as appropriate. The Code for Sustainable Homes⁸⁸ sets out the national standard for sustainable design and construction of new homes. From April 2008, achieving Level 3 of the Code became mandatory for new social housing developments. From 2010 all new residential developments will have to meet the equivalent of Level 3 of the Code for Energy Use under the Building Regulations. The Building Regulations for energy use for new residential development will be progressively tightened requiring buildings to be effectively 'carbon neutral' from 2016 onwards, which is equivalent to Level 5/6 of the Code. In terms of carbon emissions Level 3 equals a 25% energy/carbon improvement relative to current 2006 standards in the Building Regulations. New housing developments will have to comply with Level 4 by 2013 (44% energy/carbon improvement relative to current 2006 standards in the Building Regulations) and Level 5 by 2016 (zero carbon). East Herts is currently developing a Climate Change Strategy and an Action Plan.
- 11.2.3 Planning Policy Statement 25 (PPS25)⁸⁹ sets out Government policy on development and flood risk. Its aims are to ensure that flood risk is taken into account at all stages in the planning process, to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk. Where new development is, exceptionally, necessary in such areas, the policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. PPS25 requires a Strategic Flood Risk Assessment (SFRA) to be carried out to inform the sustainability appraisal and preparation of the authority's Local Development Documents (LDDs). The aim of the SFRA is to provide a detailed and robust assessment of the extent and nature of the risk of flooding and its implications for land use planning. In addition, the SFRA sets the criteria with respect to flood risk for the submission of planning applications and for guiding subsequent development control decisions.
- 11.2.4 The East of England Plan includes policies which address both climate change mitigation and adaptation.
- 11.2.5 In terms of energy, one of the Plan's objectives is *"to reduce the region's impact on, and exposure to, the effects of climate change by...maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources."* Policy **ENG1: Carbon Dioxide Emissions and Energy Performance** highlights the roles played by both location and design to optimise carbon performance and Policy **ENG2: Renewable Energy Targets** supports the development of new facilities for renewable energy power generation.
- 11.2.6 Policy **WAT 1: Water Efficiency** recognises that there is a need for a co-ordinated programme for improving water efficiency. This includes CSH promoting a target consumption not exceeding 80 litres/head/day at level 5. Policy **WAT 4: Flood Risk Management** identifies the significant risk of coastal and river flooding in parts of the East of England and emphasises priorities to

⁸⁶ Communities and Local Government (2007) *Planning Policy Statement: Planning and Climate Change* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/ppsclimatechange.pdf> (accessed 16 June 2009).

⁸⁷ ODPM (2004) *Planning Policy Statement 22: Renewable Energy* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps22> (accessed 17 June 2009).

⁸⁸ CLG (2008) *The Code for Sustainable Homes: setting the standard in sustainability for new homes* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/codesustainablehomesstandard.pdf> (accessed 17 June 2009).

⁸⁹ Communities and Local Government (2006) *Planning Policy Statement 25: Development and Flood Risk* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps25floodrisk> (accessed 15 July 2009).

defend existing properties from flooding and locate new development where there is little or no risk of flooding. In addition, Policy **ENV1: Green Infrastructure** recognises the contributions of green infrastructure towards flood alleviation, including the Lea Valley Regional Park. Policy **ENV3: Biodiversity and Earth Heritage** promotes the restoration and re-establishment of habitats and wildlife corridors.

11.2.7 The Thames Catchment Flood Management Plan (CFMP) provides a strategic overview of flood risk management issues for specific river catchments. They are a long-term plan for the next 50-100 years, and provide the basis for Flood Risk Management investment plans. East Herts district is covered by two of the 43 CFMP policy units with the Thames CFMP. These are the Upper Lea Policy unit; and Middle Lee and Stort policy unit.

11.2.8 East Herts Local Strategic Partnership's (LSP's) shared ambitions are to:⁹⁰

- Improve and adapt effectively to the impacts of climate change on residents and businesses
- Develop initiatives to reduce carbon emissions and water consumption and to plan for appropriate adaptation to the effects of climate change where necessary
- Encourage residents to save energy and money, through improved insulation measures in homes and to promote the use of appropriate domestic alternative energy measures
- Encourage all new developments to be both carbon and climate friendly reflecting and conserving the special distinctiveness of the district

11.3 What are the key objectives and other decision-making criteria that we need to consider?

11.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

- Promote sustainable growth within environmental limits
- Reduce greenhouse gas emissions
- Adapt to the impacts of climate change
- Move goods and people sustainably.

11.4 What's the situation now? (including any existing problems)

11.4.1 Climate change models suggest that East Herts, as part of the East of England, is likely to be one of the worst affected areas in the UK. In particular, over the next 30 years the district is likely to experience:

- Decreased summer and increased winter precipitation
- High summer temperatures
- Increasingly variable weather patterns

⁹⁰ East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/g/f/Item_5_170409.pdf (accessed 4 August 2009).

- Increased incidences of flooding
- Need for increasing irrigation of farmland⁹¹.

11.4.2 Presently, the total per capita emissions of East Herts are the highest in the county and demonstrate a rising year-on-year trend. This is comprised by increasing sectoral emissions in industrial and commercial (339 kt CO₂ / 35% of emissions), domestic (351 kt CO₂ / 36% of emissions) as well as a significant proportion from road transport (281 kt CO₂ / 29% of emissions). Car ownership and total mileage per resident are both high within the district due to the relatively rural geography of the area as well as its affluence.⁹²

11.4.3 In 2006, East Herts produced 971 kt of carbon dioxide. This equates to per capita emissions of 7.3 t. The per capita figure is higher than the county average of 6.4 t and is the same as the regional average of 7.3⁹³ (see Table 7).

Table 7: 2006 CO₂ emissions

Area	Industry and Commercial (kt CO ₂)	Domestic (kt CO ₂)	Road Transport (kt CO ₂)	Per capita emissions (tonnes of CO ₂)
East Herts District	339 (35%)	351 (36%)	281 (29%)	7.3
Hertfordshire	2,557 (38%)	2,718 (40%)	1,484 (22%)	6.4
East of England	15,792 (39%)	13,912 (34%)	11,172 (27%)	7.3

11.4.4 Within East Herts there is capacity for a small to medium scale wind farm generating a capacity between 5 – 30 megawatts⁹⁴. This includes capacity for biomass across Hertfordshire as a whole and a very limited potential for hydro schemes with the weir in Hertford the only possibility identified in the district.⁹⁵

11.4.5 The Council does not currently monitor renewable energy generation and the only existing information is where a planning application is submitted for a renewable energy installation. Prior to 1st April 2007, the Council had approved four individual applications for solar panels. It is not clear what the total annual output of these applications is at present although the Council's AMR estimates this to be 4,180 kWh (4 megawatts).⁹⁶

11.4.6 There is an increasing recognition of the link between energy and water use. Within homes, water usage accounts for 27% of all carbon emissions⁹⁷.

⁹¹ East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/q/f/Item_5_170409.pdf (accessed 4 August 2009).

⁹² Ibid.

⁹³ Defra (2008). *Local government performance framework* [online] available at: <http://www.defra.gov.uk/environment/statistics/globalatmos/download/regionalrpt/local-regionalco2-ni186indicator.xls> (accessed 4 August 2009).

⁹⁴ East Herts District Council (2009). *Annual Monitoring Report* [online] available at: http://80.168.51.108/media/pdf/b/o/AMR_07-08.pdf (accessed 5 August 2009).

⁹⁵ Ibid.

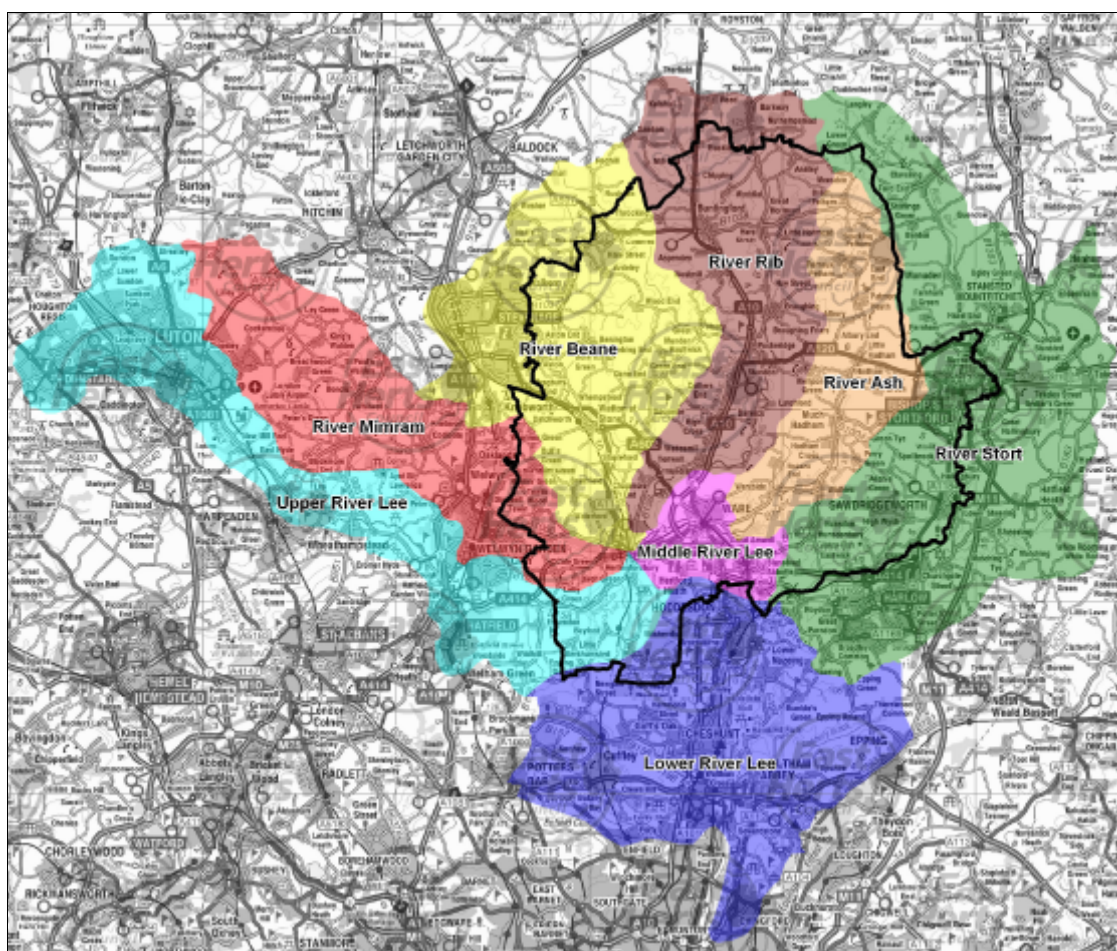
⁹⁶ Ibid.

⁹⁷ Consultation response drawing on: Environment Agency (2009). *Water for people and the environment: water resources strategy for England and Wales*.

Flood Risk

- 11.4.7 East Herts falls entirely within Lee and Stort catchments yet the district's catchment system is complex, consisting of a number of tributaries of the Lee. These tributaries (the Mimram, Rib and Beane) converge with the Lee in Hertford. The Ash joins the Lee at Amwell and the Stort joins the Lee at Rye Meads in the southernmost part of the district.⁹⁸ Figure 12 shows the main water catchments in the district.

Figure 12: Main water catchments in East Herts⁹⁹



- 11.4.8 As cited in the East Herts SFRA, the Rye Meads Water Cycle Study identifies that the two principal challenges related to flood risk from development growth across the study area¹⁰⁰ are:

- Potential development within existing flood risk areas; and
- Increased risk of surface water runoff created by hard surfacing at new developments.

⁹⁸ East Herts District Council (2008). *Strategic Flood Risk Assessment* [online] available at: http://80.168.51.108/media/pdf/1/1/East_Herts_SFRA_16_10_08FINAL.pdf (accessed 5 August 2009).

⁹⁹ Ibid.

¹⁰⁰ This study was commissioned by a group of seven LPAs including East Herts.

11.4.9 The key characteristics of the two CFMP policy units which cover the East Herts district are shown in Figure 13.

Figure 13: CFMP messages for East Herts¹⁰¹

Upper Lee	Middle Lee and Stort
Narrow floodplains towards the headwater of the catchment.	Extensive downstream floodplains, flooding occurs following prolonged rainfall
Wide downstream floodplains.	The extensive floodplains provide some natural storage and reduce risk to urban areas (e.g. Hertford and Ware)
Approx 2000 properties are in Flood Zone 2 and are at risk from a 1 in 1000 annual probability event (0.1% AEP fluvial flood)	Environmentally designated sites, sensitive to water level and flow management
Properties at risk are widely distributed across the policy unit.	Much flood risk downstream of policy unit, interventions in the Middle Lee and Stort may help reduce flood risk downstream
Changes in flood flow and level have a big impact on number of properties at risk.	Development pressure in Harlow and along M11 corridor
	Attenuating water in the Middle Lee or Lower Stort could be part of a longer-term option to reduce flood risk in the Lower Lee

11.4.10 The flood risk management approach recommended for these two policy units are as follows:¹⁰²

- The floodplain is the district's most important asset in managing flood risk
- Maintain the capacity of the natural floodplain to retain water and maintain the conveyance of watercourses in the towns and villages to reduce flood risk and provide environmental benefit
- Safeguard the floodplain from inappropriate development
- Refurbishment of buildings and redevelopment of industrial areas in the floodplain offers the opportunity to increase the resilience of these areas
- Safeguard land for future flood storage schemes
- Appropriate storm attenuation measures should be incorporated into new development
- Rigorous application of PPS25
- Encourage flood resilience and resistance measures at the individual property level
- Restore channel and re-establish water meadows¹⁰³.

¹⁰¹ East Herts District Council (2008). *Strategic Flood Risk Assessment* [online] available at: http://80.168.51.108/media/pdf/i/i/East_Herts_SFRA_16_10_08FINAL.pdf (accessed 5 August 2009).

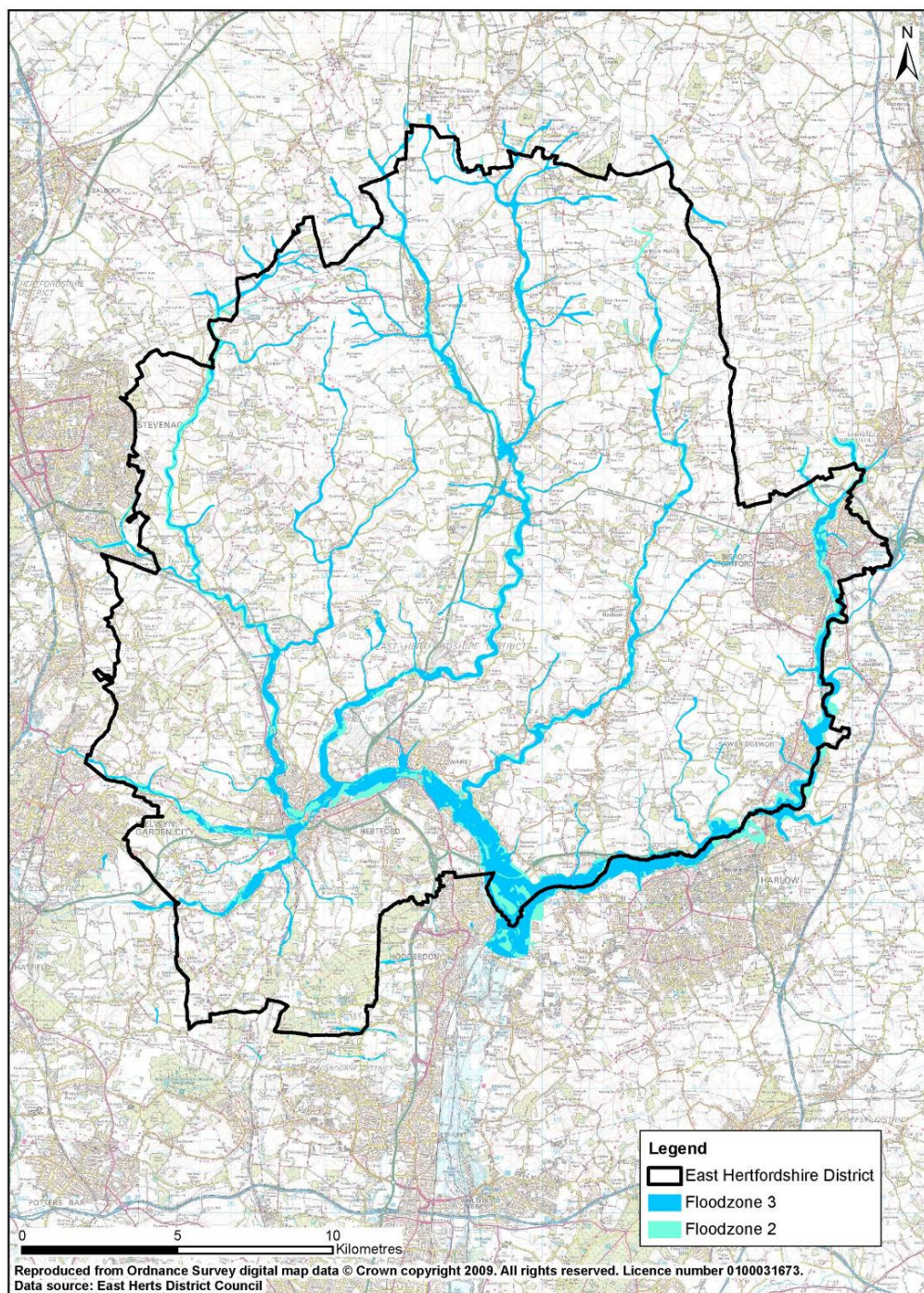
¹⁰² Ibid.

- 11.4.11 Within East Herts, main river flooding poses the greatest flood risk, particularly in the river corridors running through the urban areas of Hertford, Ware and Bishop's Stortford.¹⁰⁴ River flooding is of concern in the river corridors through all the major settlements in the district, including Bishop's Stortford, Hertford, Ware, Buntingford, Sawbridgeworth and Stansted Abbots. Additionally, parts of Watton-at-Stone, Little Hadham, and Standon have been indicated as areas at high risk of river flooding. Figure 14 shows flood zones within the district.

¹⁰³ Consultation response: flood risk management should also consider planning policy with respect to water usage including grey-water recycling policies and Sustainable Drainage Systems (SuDS)

¹⁰⁴ East Herts District Council (2008). *Strategic Flood Risk Assessment* [online] available at: http://80.168.51.108/media/pdf/l/i/East_Herts_SFRA_16_10_08FINAL.pdf (accessed 5 August 2009).

Figure 14: Flood zones 2 and 3 in East Herts



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11.4.12 In terms of sewer flooding, the SFRA notes that it is rare for foul/waste sewer surcharging events to occur and these are usually very quickly attended to by Thames Water. Additionally, recorded surface water flooding incidents appear to be isolated, although multiple incidents have been

recorded in central Buntingford and the Hockerill area of Bishop's Stortford. The Government has identified Bishop's Stortford, Sawbridgeworth, and Hertford as being within the top 10% of settlements in the country at most risk of surface water flooding¹⁰⁵.

11.4.13 The SFRA provides several observations in relation to the impact of flooding on critical infrastructure including Sewerage Treatment Plants (SWTs), hospitals, fire stations, GP surgeries and ambulance stations. These observations include:

- Most of the A-roads in the district are vulnerable to extreme flood incidents. This could affect the ability of emergency services to attend flood incidents and affect the viability of evacuation routes;
- Sewerage treatment infrastructure is typically located within the flood plain because of the requirement for gravity to convey effluent. The risks associated with flooding of sewerage treatment include contamination of the drinking water supply and water-borne diseases. Within East Herts SWTs identified as being at risk include Rye Meads, the Little Hallingbury Pumping Station and the Sewage Treatment works on the River Rib at Buntingford, and the River Ash at Furneux Pelham.

Are there any evidence gaps?

11.4.14 Evidence gaps include

- Monitoring of renewable energy generation
- NI 188 – Planning to adapt to climate change
- NI1 185 – CO2 reduction from local authority activities.

11.5 What will be the situation without the plan? (the 'business-as-usual' option)

11.5.1 Without the plan CO2 emissions from transport within the district can be expected to continue present upward trends. However, overall levels of GHG emissions can be expected to decrease through national and international level policy interventions. However, future low levels of decentralised and renewable energy generation can be expected.

11.5.2 In terms of flood risk, this is likely to increase in the future even if no further development occurred in within East Herts or neighbouring districts, due to the effects of climate change. The Pitt Review concluded that flood risk will increase in the future:

The scale of the problem is [...] likely to get worse [...] and] events of this kind are expected to become more frequent. [...]. Climate change has the potential to cause even more extreme scenarios than were previously considered possible. The country must adapt to increasing flood risk.

11.5.3 For East Herts, without the plan there is likely to be further risk of flooding within the urban areas of Hertford, Ware, and Bishop's Stortford. However, the plan should provide assistance in minimising this risk. Importantly, without the plan the impact of substantial developments -such

¹⁰⁵ East Herts District Council (2008). *Strategic Flood Risk Assessment* [online] available at: http://80.168.51.108/media/pdf/l/i/East_Herts_SFRA_16_10_08FINAL.pdf (accessed 17 March 2010).

as that proposed for North Harlow – on surface water flooding risk for smaller villages within close proximity may be greater than active intervention through Core Strategy policies.

11.6 What issues should be a particular focus for the appraisal?

11.6.1 In light of the information above, key issues to take into account in the appraisal in relation to climate change and flood risk include:

- The need to lower GHG emissions
- The need to increase the amount of energy generated by decentralised or renewable sources
- The impact of development on surface water flooding
- Development within the areas at risk of flooding
- The need to promote water efficiency as well as energy efficiency due to the anticipated increased water demand from people and the environment
- The need to take the findings of the SFRA into account in preparing policies and allocating sites for development.

12 Community and wellbeing

12.1 Introduction

- 12.1.1 The Department for Communities and Local Government (CLG)¹⁰⁶ has defined sustainable communities as: *“...places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all”*.
- 12.1.2 As such, sustainable communities embody the principles of sustainable development by: *“balancing and integrating the social, economic and environmental components of their community, meeting the needs of existing and future generations and respecting the needs of other communities in the wider region or internationally to make their own communities sustainable”*.
- 12.1.3 Social inclusion is a key aspect of sustainable communities and many interlinked factors are important in ensuring that individuals and areas are able to fully participate in society. Factors such as low income poverty and unemployment can be compounded by poor housing, high crime, discrimination, bad health and family breakdown. A combination of problems can create a vicious cycle and lead to social exclusion. *“Social exclusion can happen as a result of problems that face one person in their life. But it can also start from birth. Being born into poverty or to parents with low skills still has a major influence on future life chances”*.
- 12.1.4 Community wellbeing is therefore influenced by a number of crosscutting factors. This section focuses on many of these, including equalities, health, education, safety, and deprivation.

12.2 What's the policy context?

- 12.2.1 Sustainable Communities: Building for the Future¹⁰⁷ (the ‘Sustainable Communities Plan’) was launched in 2003 and sets out a long-term programme of action for delivering sustainable communities in urban and rural areas. The main aspects are:
- addressing housing shortage, comprised of accelerating the provision of housing, affordable housing and tackling homelessness;
 - addressing low demand and abandonment;
 - ensuring all social housing is brought up to a decent standard by 2010;
 - improving the local environment of all communities (liveability); and
 - protecting the countryside and using land more effectively.
- 12.2.2 PPS1: Delivering Sustainable Development¹⁰⁸ sets out the overarching planning policies on the delivery of sustainable development through the planning system; stresses the importance of a strong, stable and productive economy and requires local planning authorities (LPAs) to ensure

¹⁰⁶ CLG (2003) *Sustainable Communities: Building for the Future* [online] available at: <http://www.communities.gov.uk/publications/communities/sustainablecommunitiesbuilding> (accessed 18 June 2009).

¹⁰⁷ Ibid.

¹⁰⁸ ODPM (2005) *Planning Policy Statement 1: Delivering Sustainable Development* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement1.pdf> (accessed 18 June 2009).

that the necessary infrastructure is provided to support new and existing development and housing. It also states that accessibility to jobs and services should be addressed as a means of achieving social cohesion and inclusion. PPS3: Housing¹⁰⁹ emphasises that housing developments should be in suitable locations, which offer a good range of community facilities and good access to jobs, services and infrastructure. The Government's White Paper, *Strong and Prosperous Communities*¹¹⁰ introduced a new performance framework tailored to the local needs through the Local Area Agreement and encourages councils to develop neighbourhood charters setting out local standards and priorities. The White Paper also calls for more accountable and responsive local government, a greater role for community participation in decision-making and an enhanced role for community groups.

- 12.2.3 The Government's strategy for neighbourhood renewal – *A New Commitment to Neighbourhood Renewal* (2001) – included a commitment to social inclusion and that within 10 to 20 years no one should be seriously disadvantaged by where they live. This should be done by addressing the underlying problems of declining areas such as high unemployment, weak economies and poor schools and using LSPs to unite public, private, community and voluntary sector and drive change forward.
- 12.2.4 The overall spatial vision of the East of England Plan refers to meeting housing needs in 'sustainable inclusive communities'. Policies with relevance to this Topic include **Policy SS1: Achieving Sustainable Development** which recognises that sustainable development incorporates a commitment to a 'strong, healthy and just society'. This can be achieved through application of the elements contributing to the creation of sustainable communities which include active, inclusive and safe in terms of community identity and cohesion, social inclusion and leisure opportunities, well run in terms of effective participation, representation and leadership, well connected in terms of good transport services, well served in terms of public, private, community and voluntary services and fair for everyone. **SS2: Overall Spatial Strategy** sets the context for developing policies in LDDs such as requiring that new development contributes to improving quality of life, community cohesion and social inclusion including by making suitable and timely provision for health, social services sectors and education needs. **Policy ENV7: Quality in the Built Environment** which directs new developments to "address crime prevention, community safety and public health". In addition, several policies directly address the challenge of deprivation.
- 12.2.5 Regional Social Strategy (RSS)¹¹¹ and the Regional Economic Strategy (RES)¹¹² both address equality and diversity. The RSS vision is to achieve social inclusion throughout the East of England. The RSS has more specific objectives to directly tackle issues of equality and diversity, whereas the RES's approach is to treat equality and diversity as an underlying principle informing the overall strategy for the economic and social vitality of the region. There is obviously overlap between the strategies. However, the RSS sets a wider remit and identifies specific priorities more clearly.

¹⁰⁹ ODPM (2000) *Planning Policy Statement 3: Housing* [online] available at:

<http://www.communities.gov.uk/publications/planningandbuilding/pps3housing> (accessed 17 July 2009).

¹¹⁰ CLG (2006) *Strong and Prosperous Communities - The Local Government White Paper* [online] available at:

<http://www.communities.gov.uk/publications/localgovernment/strongprosperous> (accessed 17 July 2009).

¹¹¹ East of England Regional Assembly (2007) *Regional Social Strategy 2nd Edition* [online] available at:

<http://www.eera.gov.uk/What-we-do/developing-regional-strategies/regional-social-strategy/> (accessed 16 September 2009)

¹¹² East of England Development Agency (2008) *The Regional Economic Strategy for the East of England 2008-2031* [online] available at: <http://www.eastofengland.uk.com/res/> (accessed 16 September 2009).

12.2.6 East Herts' LSP's vision is to "[c]reate a thriving, fair, and inclusive East Herts that safeguards and enhances our unique mix of rural and urban communities, where people choose to live, work and visit because:

- *It is safe, clean, green and well connected;*
- *Everyone matters and can take part in decisions that affect their lives; and*
- *There are sustainable economic and social opportunities that improve quality of life and are available to all.*

12.2.7 Community safety is addressed through the Council's Community Safety Action Plan¹¹³, the aims of which include working with people to lower perceptions of crime and to reduce crime, anti social behaviour and alcohol abuse while minimising the harm caused by illegal drugs and raising awareness and address issues relating to domestic violence.

12.2.8 The East Herts Public Health Strategy¹¹⁴ has been developed to provide a focus to the Public Health and Health Promotion work that different services with the Council are involved in. The Strategy identifies priority elements for the district which include:

- Reducing the number of smokers
- Increase participation in physical activity
- Increase the number of people eating healthily
- Reduce the prevalence of obesity
- To complete Public Health related work which focuses on the wider factors that contribute to public health.

12.2.9 The East Herts Disability Equality Strategy and Disability Equality Action Plan¹¹⁵ was prepared in line with the duty local authorities have to produce a Disability Equality Scheme which can be part of a wider equalities scheme. The Council's corporate vision is to "improve the quality of people's lives and preserve all that is best in East Herts." One priority through which this vision will be achieved is by "enhance[ing] the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable." The objectives of the Action Plan have been drawn up to effectively address the requirements of people with disabilities in East Herts.

EqIA Policy Context

12.2.10 The Equality Act (2006) and other equality legislation introduce specific measures to protect equality groups from discrimination and to promote equality of opportunity for them.

12.2.11 Legislation on Age Discrimination, which came into effect in October 2006, Employment Equality (Age) Regulations 2006, prohibit unjustified direct and indirect age discrimination, and all harassment and victimisation on grounds of age, of people of any age, young or old in relation to employment and provision of education.

¹¹³ East Herts District Council (2008). *Community Safety Action Plan* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=6798> (accessed 17 September 2009).

¹¹⁴ East Herts District Council (2008). *East Herts Council Public Health Strategy 2008-2013* [online] available at: http://www.eastherts.gov.uk/media/pdf/p/t/Public_Health_Strategy_2008-2013.pdf (accessed 17 September 2009).

¹¹⁵ East Herts District Council (no date). *East Herts Disability Strategy and Disability Equality Action Plan* [online] available at: http://80.168.51.108/media/pdf/o/DisabilityEqualityStrategy_1.pdf (accessed 17 September 2009).

- 12.2.12 From December 2006 The Disability Discrimination Act (DDA) 1995 was amended to place a duty on all public bodies to promote disability equality - the Disability Equality Duty. This legal duty requires all public bodies to actively look at ways of ensuring that disabled people are treated equally.
- 12.2.13 The Equal Pay Act (EPA) 1970 legislates for parity in pay and benefits for individuals, regardless of their sex, in the same employment, where the individual is doing like work.
- 12.2.14 The Sex Discrimination Act (SDA) 1975 prohibits sex discrimination against individuals in areas such as education, employment and in the provision of services, goods and facilities. The SDA applies to women and men of all ages, and children. The Equality Act includes amendments to the SDA.
- 12.2.15 The Race Relations Act 1976, which was amended by the Race Relations (Amendment) Act 2000, forms the legal foundation of protection from racial discrimination in the fields of employment, education, training, housing and the provision of goods, facilities and services. The Race Relations (Amendment) Act 2000 gives public authorities general and specific duties. The general duty is that public authorities must make the promotion of racial equality central to their work.
- 12.2.16 The Employment Equality (Religion or Belief) Regulations 2003, as amended by the Equality Act 2006, make it illegal to discriminate on the grounds of religion or belief in the areas of employment and vocational training.
- 12.2.17 The Employment Equality (Sexual Orientation) Regulations 2003 prohibit discrimination on grounds of sexual orientation in employment and vocational training.
- 12.2.18 The Civil Partnership Act (2004) gives same-sex couples the opportunity to form a civil partnership and gain legal recognition of their relationship. In consequence, the Employment Equality (Sexual Orientation) Regulations 2003 were amended to show that the status of a civil partner is comparable to the status of a spouse.

12.3 What are the key objectives and other decision-making criteria that we need to consider?

- 12.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:
- Reduce poverty and inequality and promote social inclusion
 - Promote employment, learning, skills and innovation
 - Meet the needs of the changing regional demographic
 - Provide decent, affordable and safe homes for all.

12.4 What's the situation now? (including any existing problems)

- 12.4.1 This section has been structured according to the six equality streams in line with EqIA advice¹¹⁶. These are then followed by sections on health and a final general community wellbeing section.

Race and Ethnicity

- 12.4.2 In terms of diversity, East Herts (7%) has the lowest proportion of dependent children from an ethnic minority compared to the rest of Hertfordshire. Table 8 includes data taken from the 2007 Schools census.

Table 8: Student diversity in East Herts, 2007¹¹⁷

Total number of pupils	# and % pupils in a BME group	# and % Other White pupils	Largest non-white ethnic group	2 nd Largest	3 rd Largest
23,498	2,929 12.5%	984 4.19%	Any Other Mixed 258	White and Asian 193	White and Black Caribbean 145

Gender

- 12.4.3 Gender has been scoped out from this appraisal because the coverage of the proposed LDF policies are not likely to have a significant impact on equality of opportunity with regard to this stream.

Disability

- 12.4.4 At the time of the 2001 census 12.4% of the East Herts population said that they had a limiting long-term illness and 5.8% said that their general health was 'not good'. If these two groups are used as the basis for estimating the number of people that may meet the Disability Discrimination Act definition of a disabled person then that equates to 18.2% of the population, or just over 23,000 people¹¹⁸.

Sexual Orientation

- 12.4.5 Sexual orientation has been scoped out from this appraisal because the coverage of the proposed LDF policies is not likely to have a significant impact on equality of opportunity with regard to this stream.

Age

- 12.4.6 Life expectancy in East Herts is above the national average it is anticipated that there will be a 60% increase in people over 75 years by 2025. In addition to a growing population, this type of

¹¹⁶ Improvement & Development Agency (no date). *Equality Impact Assessments (EqIAs)* [online] available at: <http://www.idea.gov.uk/idk/core/page.do?pagelId=8017247> (accessed 17 September 2009).

¹¹⁷ Hertfordshire County Council (no date). *Hertfordshire: comparison of districts in Hertfordshire* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/HERTBME.pdf> (accessed 20 October 2009).

¹¹⁸ East Herts District Council (no date). *Disability Equality Strategy and Disability Equality Action Plan* [online] available at: http://80.168.51.108/media/pdf/o/DisabilityEqualityStrategy_1.pdf (accessed 17 September 2009).

structure will have clear implications for the future delivery of social services and health care. Additionally, there is a two year difference in life expectancy between females in the five most deprived wards compared to the five least deprived wards. There are 6,647 carers aged over 50 in the district.¹¹⁹

Religion and Belief

- 12.4.7 Table 9 compares the religious profile of East Herts to that of Hertfordshire as a whole. Relative to the other districts in the county, East Herts has the largest Christian majority and the smallest religious minorities.

Table 9: Religious profile of East Herts and Hertfordshire¹²⁰

Area	% of children who are Christian	% of children with 'no religion'	Largest non-Christian religion	2 nd largest non-Christian religion
Hertfordshire	64.8	20.2	Muslim 2.5%	Jewish 1.8%
East Herts	71.43	18.9	Muslim 0.8%	Hindu 0.7%

Health

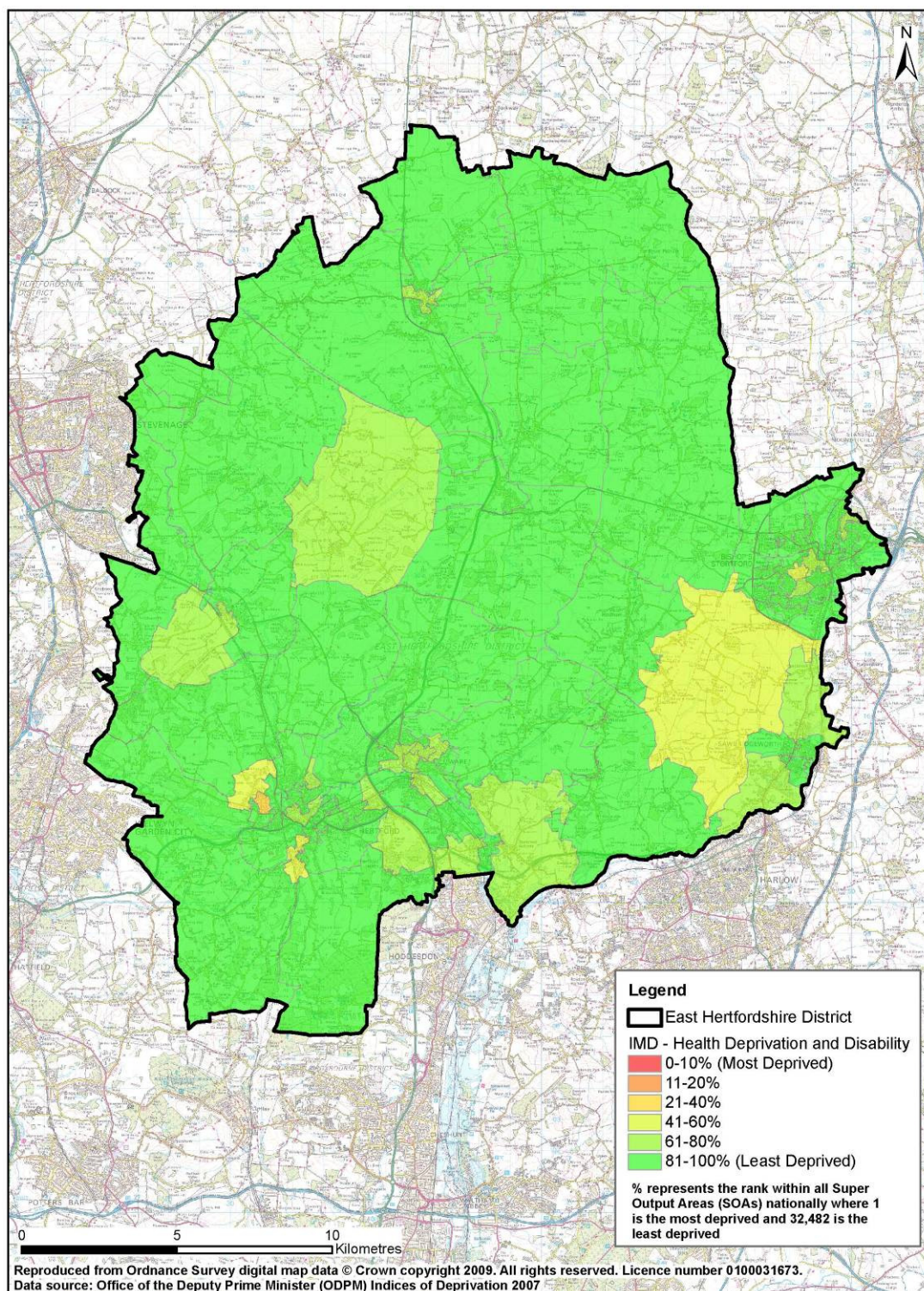
- 12.4.8 Over the past ten years, deaths from all causes, and early deaths from cancer, heart disease and stroke have improved and are better than the England average. However, only 1 adult in 10 is physically active. Smoking kills around 150 adults per year and the proportion of women who smoke during pregnancy, although better than the previous year, is still similar to the England average. Although better than the England average, 1 in 6 adults aged 65 years or over reports that their health is not good.¹²¹
- 12.4.9 Levels of health within East Herts are relatively good in comparison to the rest of the country. This is illustrated by Figure 15. This map also highlights that overall levels of health within East Herts are generally better within the district's rural areas compared to the main settlements.

¹¹⁹ East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/q/f/Item_5_170409.pdf (accessed 4 August 2009).

¹²⁰ Hertfordshire County Council (no date). *Hertfordshire: comparison of districts in Hertfordshire* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/HERTBME.pdf> (accessed 20 October 2009).

¹²¹ Association of Public Health Observatories (2009). *Health profile 2009: East Hertfordshire* [online] available at: <http://www.apho.org.uk/resource/item.aspx?RID=71350> (accessed 5 August 2009).

Figure 15: IMD 2007 - Health deprivation and disability



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12.4.10 Parts of rural East Herts suffer from a lack of access to services such as health facilities and there are large remote areas where more than 10% of households do not own a car. Additionally, while the health of the district is generally good there are pockets of relative deprivation in some town based ward areas and certain rural wards.¹²² East Herts Council's draft Playing Pitch Strategy (Knight, Kavanagh & Page) indicates that in general provision of playing pitches across the district is good, although there are areas of deficiency in certain sports, particularly in the Hertford-Ware and Bishop's Stortford study areas.

Other community and wellbeing evidence

12.4.11 Registered charities and the voluntary and community sector (VCS) are an important part of East Herts' social infrastructure and local economy. The district is well served by community groups which provide social, health, cultural and leisure opportunities, training, advice, information, befriending and fundraising services. Statistics on the VCS in East Herts include:

- More than 1,000 active VCS groups in the district
- Voluntary groups run many of the 60 community centres and rural village halls
- VCS groups in the district support almost 20,000 active volunteers¹²³.

12.4.12 There are 60 community centres and village halls in the district which are used by voluntary groups to run sports, arts and social activities – primarily for older people and children under the age of 11. Few activities are provided for teenagers and there is a perception of fear about anti social behaviour and vandalism to the facilities.¹²⁴

12.4.13 Crime levels in East Herts are very low (one of the lowest in the country) and reduced by 17.5% between 2005 and 2008.¹²⁵ The IMD Crime domain, shown in Figure 16, reveals that the main settlements are slightly more deprived than the rural areas, however, they are still not considered deprived relative to the rest of the country.

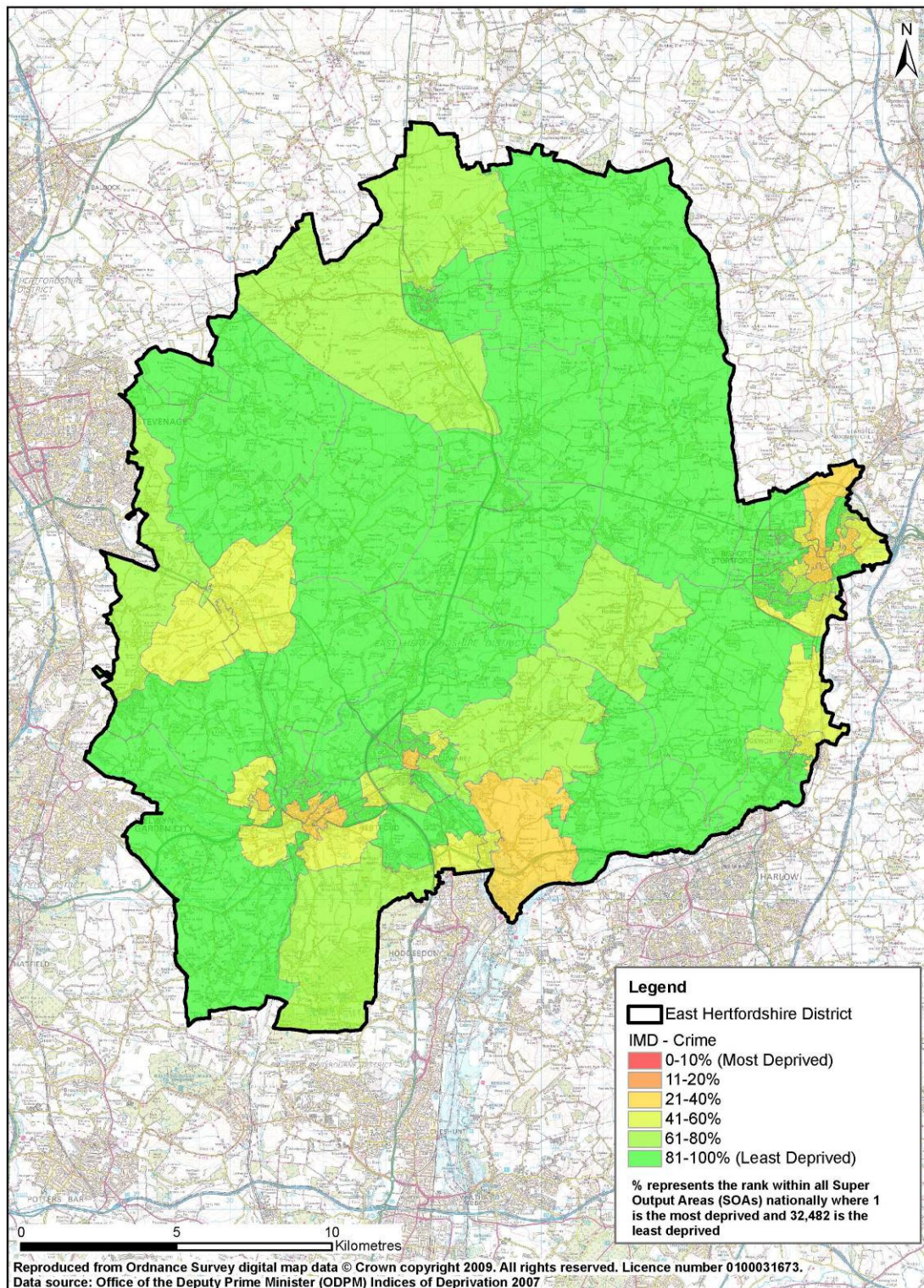
¹²² East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/g/f/Item_5_170409.pdf (accessed 4 August 2009).

¹²³ Ibid.

¹²⁴ Ibid.

¹²⁵ Ibid.

Figure 16: IMD 2007 – Crime



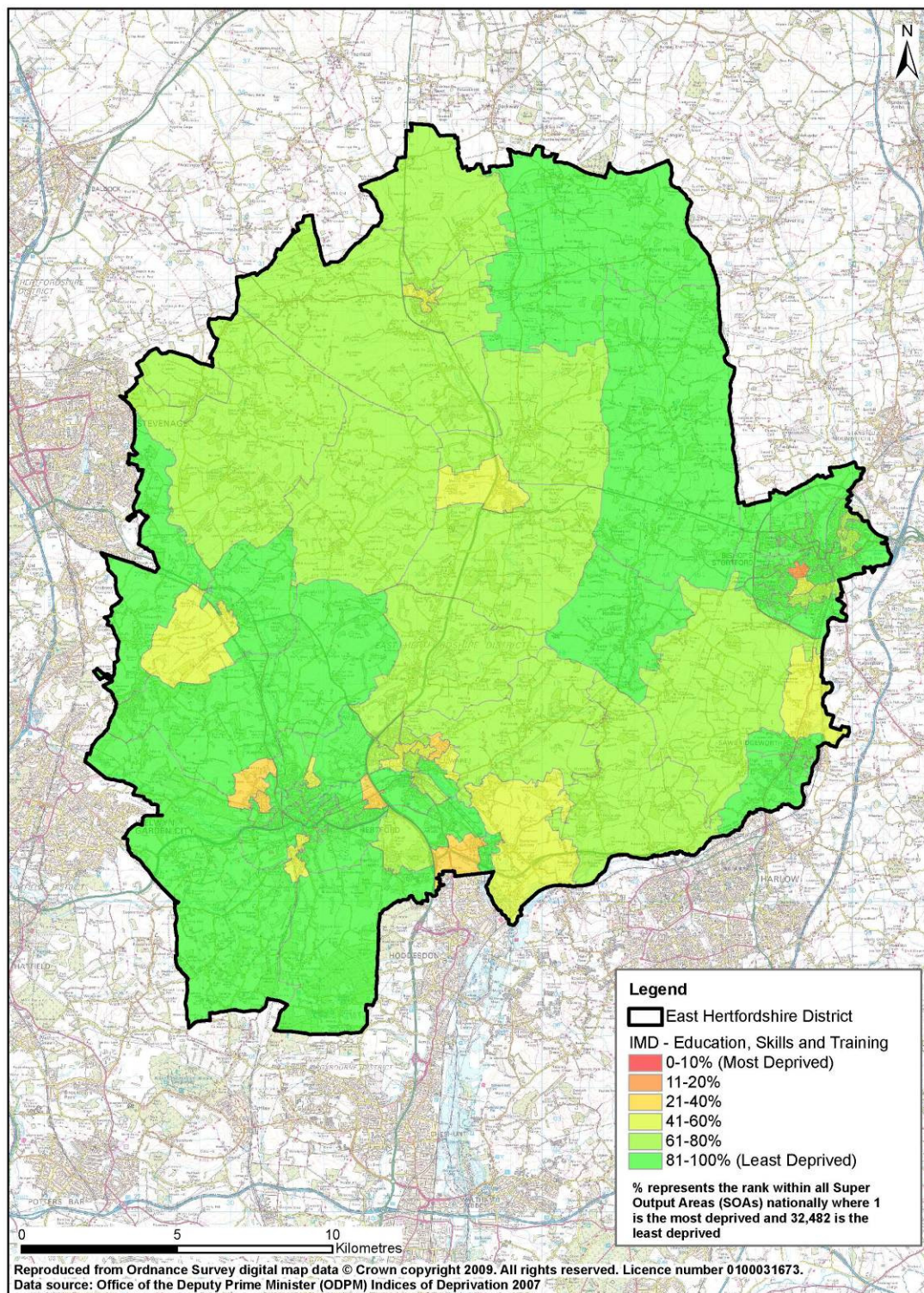
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- 12.4.14 East Herts is one of the most prosperous districts in Hertfordshire with high skill levels and qualifications, high income and low levels of unemployment. A key characteristic is the out commuting of residents with high skills to London and through the M11 corridor. East Herts has the most significant rural economic profile in Hertfordshire. Economic challenges include:
- Businesses requiring support during the recession are aware of services available and that these are accessible and effective;
 - Ensuring that sufficient employment land is available to businesses;
 - Local residents have the necessary skills to take advantage of local employment opportunities;
 - The town centre offer is enhanced to increase footfall; and
 - Support is provided to rural farming and land based businesses to help them diversify their competitive offer.
- 12.4.15 Although the district has an excellent education record it does suffer from a skills shortage in traditional trades.¹²⁶
- 12.4.16 Educational attainment is generally very high. 72.8% of pupils in East Herts achieved five or more GCSEs with grades of A* to C. This compares favourably with Hertfordshire (55.9%) and national (46.8%) averages. Schools perform well in terms of A-levels and in 2006, the average points score per examination entry in East Herts was 213.4. This is above both Hertfordshire (207.1) and national (207.5) averages.¹²⁷ As shown in Figure 17, there are isolated pockets of relative deprivation in this domain in within Bishops Stortford, Hertford and Ware.

¹²⁶ East Herts District Council (2009). *Annual Monitoring Report* [online] available at: http://80.168.51.108/media/pdf/b/o/AMR_07-08.pdf (accessed 5 August 2009).

¹²⁷ Ibid.

Figure 17: IMD 2007 – Education and training domain



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- 12.4.17 When considering the District's working age population as a whole, 34.1% are educated to at least NVQ level 4 (Degree level and above), which compares favourably with the national average of 27.4%.¹²⁸
- 12.4.18 Traffic growth and congestion are a continuing concern for residents and government predictions of traffic growth in East Herts are much higher than national projections, largely due to proposed increases in the number of households and jobs. Traffic congestion can be especially acute at peak times, both within the historic core centre of the main towns as well as on parts of the primary road network. Implications of this congestion include noise and air pollution which denigrate the environment.¹²⁹

Are there any evidence gaps?

- 12.4.19 No evidence gaps have been identified at this stage.

12.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 12.5.1 The increasingly ageing population will put additional pressure on health care and other services. It will be important that the VCS continue to play an active role in the district's social life. While the district is likely to remain relatively prosperous, disadvantaged urban and rural areas will continue to suffer relative deprivation although the experience will not be experienced in a similar fashion across these areas.

12.6 What issues should be a particular focus for the appraisal?

- 12.6.1 In light of the information above, key issues to take into account in the appraisal in relation to community and wellbeing include:
- The need to ensure that the equality, health and social care needs of a growing and ageing population are met
 - The need to ensure that opportunities to capitalise on the benefits which may emerge through the expansion of Stansted Airport
 - The need to ensure that the needs of the disabled population in the district are met
 - The need to reduce inequalities experienced in female life expectancy
 - The need to ensure that the high levels of VCS activity continues
 - The need to consider and minimise the impacts of air quality on health.

¹²⁸ East Herts District Council (2009). *Annual Monitoring Report* [online] available at: http://80.168.51.108/media/pdf/b/o/AMR_07-08.pdf (accessed 5 August 2009).

¹²⁹ East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/g/f/Item_5_170409.pdf (accessed 4 August 2009).

13 Economy and employment

13.1 Introduction

- 13.1.1 Local economies are open to global, national and regional influences and changes in the wider economy. This presents numerous threats and opportunities. Recognising local strengths and weaknesses and securing public private partnerships at the district level will help to ensure that local communities are able to respond appropriately and positively to change. A robust and prosperous economy is key to a healthy society (e.g. town vibrancy, positive environments to live and work) and with careful planning it should also enhance environmental well-being.
- 13.1.2 Local economies are characterised by a range of interlinked factors, including housing and transport which within this report are discussed in Chapters 15 and 18. This section focuses on employment, skills and education as key factors that influence the local economy of East Hertfordshire.

13.2 What's the policy context?

- 13.2.1 PPS1: Delivering Sustainable Development (2005)¹³⁰ stresses the importance of a strong, stable and productive economy and requires planning authorities to ensure that the necessary infrastructure is provided to support new and existing economic development and housing. Accessibility to jobs and services are also addressed as a means of achieving social cohesion and inclusion. The Statement sets out how local authorities can contribute to delivering sustainable economic development including recognising that economic development can deliver environmental and social benefits; recognising the wider benefits of economic development alongside any adverse local impacts; ensuring suitable locations are available for economic sectors; providing infrastructure and services to support new and existing economic development and housing; taking account of the relevant economic strategies in DPDs; and, identifying opportunities for future investment to deliver economic objectives. PPG4: Industrial, commercial development and small firms (1992)¹³¹ aims to encourage continued economic development that is compatible with the Government's environmental objectives.
- 13.2.2 Draft PPS4: Planning for Prosperous Economies¹³² consultation closed at the end of July 2009 with the government expecting to publish the final PPS and associated guidance before the end of 2009. The draft PPS4 seeks to combine all national planning policy on economic development in urban and rural areas and town centres into one consolidated and streamlined PPS. The new PPS4 seeks to provide planning certainty for businesses and investors by creating a 'positive planning' environment which recognises the importance of different drivers of economic development, from town centres through to rural enterprise. It also retains the sequential test of town centres first. In its final form this PPS will replace a number of existing guidance documents including PPG4: Industrial, Commercial Development and Small Firms, PPG5: Simplified Planning Zones and PPS6: Planning for Town Centres.

¹³⁰ ODPM (2005) *Planning Policy Statement 1: Delivering Sustainable Development* [online] available at:

<http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement1> (accessed 29 June 2009).

¹³¹ ODPM (1992) *Planning Policy Guidance 4: Industrial, Commercial Development and Small Firms* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/ppg4> (accessed 29 June 2009).

¹³² Communities and Local Government (2009) *Planning Policy Statement – Consultation Paper on a new Planning Policy Statement 4: Planning for Prosperous Economies* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/consultationeconomicpps> (accessed 25 August 2009)

- 13.2.3 PPS7: Sustainable development in rural areas (2004)¹³³ aims to raise the quality of life and the environment in rural areas and promote a sustainable, diverse and adaptable agriculture sector. Development within existing towns and villages should be allowed where it benefits the local economy and / or community (e.g. affordable housing for identified local needs); maintains or enhances the local environment; and does not conflict with other planning policies. Accessibility should be a key consideration in all development decisions likely to generate many trips. Development should be located in or next to towns or other service centres that are accessible by public transport, walking and cycling. Local authorities should set out policies allowing some limited development in, or next to, rural settlements that are not designated as local service centres, in order to meet local business and community needs and to maintain the vitality of these communities. Re-use of buildings is encouraged especially for economic development purposes. Local Authorities should also be supportive of well-conceived farm diversification schemes for business purposes.
- 13.2.4 East Herts is part of the London-Stansted-Cambridge-Peterborough Growth Area, one of the four designated growth areas in the Government's Sustainable Communities Plan. To address the housing pressures in London and the South East, the Government established housing targets for these Growth Areas to be achieved by 2021. However, achieving sustainable growth requires job creation which in turn demands the provision of sufficient employment infrastructure such as land, facilities and transport links.¹³⁴
- 13.2.5 The East of England Plan Policy E1: Job Growth sets an indicative target of 68,000 net job growth for Hertfordshire as a whole 2001-2021.
- 13.2.6 The Regional Economic Strategy for the East of England 2008-2031 sets out an overall vision for the region to 2031, which is based on achieving high levels of international competitiveness, developing a global reputation for innovation and business growth, and attracting and retaining the best talent. The RES identifies the main economic challenges for the East of England as raising rates of productivity growth, increasing entrepreneurship and the need to better manage the impacts of economic success in terms of economic participation and environmental quality. Key to this strategy is the identification of larger urban areas, regional cities and their surrounding rural areas as the drivers of physical growth and economic success. The RES sets headline targets in a number of areas including:
- growth in Gross Value Added (GVA)¹³⁵ per employee over 2008-2031 of 2.1% p.a., and in GVA per capita of 2.3% p.a.;
 - employment rate of 80% for the working population and of 70% for the 16-74 population by 2031;
 - NVQ Level 2 or above held by 90% of working-age population by 2020, NVQ 3 or above held by 68%, and NVQ Level 4 or above held by 40%; and
 - Raising the ratio of lower-quartile to average incomes to 60% by 2031
- 13.2.7 Within the Stansted/Harlow sub-region (which includes part of East Herts) the RES aims to establish the area as an important regional centre for growth by maximising the opportunities

¹³³ ODPM (2004) *PPS7: Sustainable development in rural areas* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps7> (accessed 29 June 2009).

¹³⁴ East Herts District Council (2008). *Employment land and policy review*.

¹³⁵ Gross Value Added is a measure of the economy's output based on the value of the goods and services produced by the economy minus the cost of the raw materials and other inputs used to produce them. Gross Domestic Product (GDP) by contrast is the sum of all products, such as buildings and computers, and the value of all services, including bus rides and dental work. The output of each is valued at market price and they are then summed to get the GDP.

provided by its proximity to London, Stansted Airport and Cambridge. To realise the opportunities major new transport investments are needed to improve access to employment sites, the M11 and Stansted Airport and regional east to west links.

- 13.2.8 The 2008 RES Review has been informed by the East of England Plan and the RSS includes policies which support the RES. It instructs LDDs to take into account and facilitate the delivery of the RES by putting in place complementary land use policies and proposals. Policy **E1: Job Growth** provides indicative targets for net job growth for the period 2001-2021 and for Hertfordshire as a whole this is 68,000 (no specific target is apportioned to East Herts). These growth figures are supported by Policy **E2: Provision of Employment Land** which directs LPAs to ensure through LDDs that an adequate range of sites/premises is allocated to accommodate the full range of sectoral requirements. Sites of sufficient range, quantity and quality should be provided at appropriate scales in urban areas, market towns and key rural centres. In terms of strategic employment sites (Policy **E3**), provision may be required in East Herts at locations which would support clusters / sectors or the regeneration of the Lee Valley. The effects within East Herts of Harlow as a KCDC and identified as a major town centre (Policy **E5**) and the growth of Stansted Airport (Policy **E7**) will also need to be considered.

13.3 What are the key objectives and other decision-making criteria that we need to consider?

- 13.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:
- Promote sustainable growth within environmental limits
 - Reduce poverty and inequality and promote social inclusion
 - Promote employment, learning, skills and innovation.

13.4 What's the situation now? (including any existing problems)

- 13.4.1 It should be noted that most of the documents referred to in building up the existing picture for East Herts do not take into account the latest economic recession.
- 13.4.2 Although the district's rural character means that it has an important agricultural base, the local economy is in fact dominated by the service sector with the majority of the firms being small and medium size enterprises. Businesses in East Herts tend to be small or micro enterprises concentrating on the provision of services. However, there is a significant manufacturing base in the district, with an equally significant number of warehousing, distribution and real estate businesses. These are often located in small industrial estates. There are also a number of major employers such as Glaxo Smith Kline at Ware and David Webster Lighting at Stansted Abbots. These companies have large supply chains, many locally based. In addition, the growth of Stansted Airport has led to the creation of many new opportunities including airport-related service industries such as food preparation.

- 13.4.3 East Herts is one of the most prosperous districts in Hertfordshire with a high level of skills and qualifications, high income and low levels of unemployment. Many of the economic challenges facing East Herts are cross-cutting themes and are discussed in paragraph 12.4.¹³⁶
- 13.4.4 East Herts accounts for 12% of GVA in Hertfordshire while growth has lagged the county average by 0.5% pa over the past decade. The district has a larger manufacturing sector than the county average but is under-represented in private services (which helps to explain the growth shortfall relative to the Hertfordshire average). GVA in East Herts (2005) by sector is shown in Figure 18. This highlights that in terms of growth the largest decreases were experienced in the construction and other (mainly public) services sectors while the largest increases to GVA were experienced in mining & quarrying, and transport & communications.¹³⁷

Figure 18: GVA in East Herts, 2005

Sector	GVA (£m ¹)	% of Total GVA		Growth (%pa)	
		East Hertfordshire	Hertfordshire	1995-2005	2005-2011
Agriculture	24	0.9	0.5	-0.3	0.2
Mining & quarrying	64	2.4	1.4	9.0	4.1
Manufacturing	433	16.4	13.1	3.3	1.4
Construction	192	7.3	7.3	-1.2	1.9
Distribution, hotels & catering	466	17.7	19.1	5.6	3.0
Transport & communications	160	6.0	9.1	7.7	5.5
Financial & business services	632	24.0	26.1	3.3	5.0
Other (mainly public) services	456	17.3	17.0	-0.7	2.3
Total	2639	100.0	100.0	2.7	3.0

- 13.4.5 East Herts suffered a persistent decline in employment levels during 1995 – 2005 despite reasonable population growth. Figure 19 shows that in this period the largest decreases were in the other (mainly public) services and construction sectors while the largest increases were in mining & quarrying.¹³⁸

Figure 19: Employment in East Herts, 2005

Sector	Employment (000s)	% of Total Employment		Growth (%pa)	
		East Hertfordshire	Hertfordshire	1995-2005	2005-2011
Agriculture	0.7	1.2	0.6	-1.3	-1.3
Mining & quarrying	0.5	0.8	0.4	6.7	-2.0
Manufacturing	7.4	11.8	9.5	-0.9	-1.1
Construction	5.4	8.6	7.6	-2.4	0.2
Distribution, hotels & catering	15.4	24.5	26.0	2.0	0.5
Transport & communications	1.9	3.1	6.1	-2.1	0.0
Financial & business services	14.8	23.6	24.9	-1.2	2.2
Other (mainly public) services	16.4	26.1	24.6	-2.5	0.9
Total	62.7	100.0	100.0	-1.0	0.8

- 13.4.6 However, East Herts does not suffer from employment deprivation. As shown in Figure 20 there are only small parts of the district which contain Lower Super Output Areas (LSOAs) ranked 20-40% least deprived in this domain (LSOAs are units of geography used in the UK for statistical

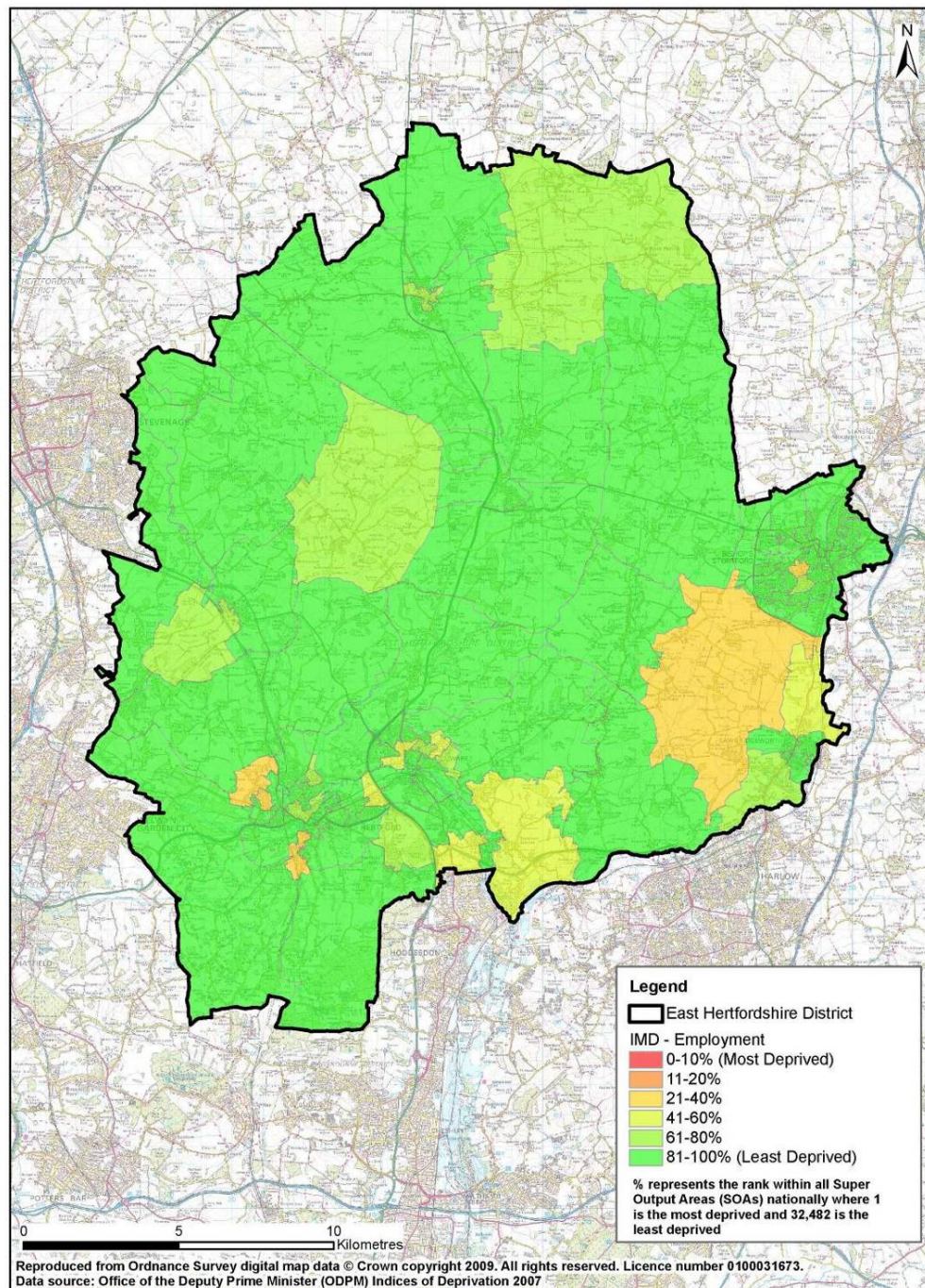
¹³⁶ East Herts District Council (2009). *Annual Monitoring Report* [online] available at: http://80.168.51.108/media/pdf/b/o/AMR_07-08.pdf (accessed 5 August 2009).

¹³⁷ Hertfordshire Observatory (2006). *District profiles – East Herts*.

¹³⁸ Ibid.

analysis). These are found within a predominantly rural area to the south of Bishops Stortford and around the outskirts of Ware.

Figure 20: IMD 2007 – Employment¹³⁹



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¹³⁹ The Indices of Multiple Deprivation (IMD) combine a number of indicators, chosen to cover a range of economic, social and housing issues, into a single score for each small area in England.

- 13.4.7 Claimant count unemployment in 2006 was 1.0%. While this has marginally increased since 2004, East Herts still had the lowest unemployment rate in the county.¹⁴⁰ However, since the recent recession, Hertfordshire as a county has experienced an increase in claimants of unemployment related benefit – by 10,968 in the 12 months to July 2009. The county has experienced redundancies in the financial services sector in particular. With specific relevance to East Herts, earlier in 2009 GlaxoSmithKline announced the loss of 600 jobs at its Ware facility¹⁴¹.
- 13.4.8 In terms of qualifications East Herts performs better than both the East of England regional and national averages. These figures are highlighted in Table 10¹⁴². In particular, East Herts has significantly more residents qualified to NVQ 4 and above compared to the regional average and significantly less with no qualifications.

Table 10: Qualifications (Jan 2008 - Dec 2008)

Qualification level	East Herts (numbers)	East Herts (%)	East of England (%)	Great Britain (%)
NVQ 4 and above	27,500	33.1	26.1	29.0
NVQ 3 and above	46,500	55.9	43.4	47.0
NVQ 2 and above	59,100	71.0	62.8	65.2
NVQ 1 and above	73,600	88.4	78.8	78.9
Other qualifications	5,100	6.1	9.3	8.7
No qualifications	4,600	5.5	11.8	12.4

- 13.4.9 The district's relative prosperity is also reflected through earnings by residence as shown in Table 11.¹⁴³ The district compares favourably relative to East of England and National averages across every category.¹⁴⁴

¹⁴⁰ Hertfordshire Observatory (2006). *District profiles – East Herts*.

¹⁴¹ Insight East (2009). *East of England Recession Impact*.

¹⁴² NOMIS (2009). *Labour market profile: East Hertfordshire* [online] available at: <https://www.nomisweb.co.uk/reports/lmp/la/2038431795/report.aspx> (accessed 5 August 2009).

¹⁴³ Ibid.

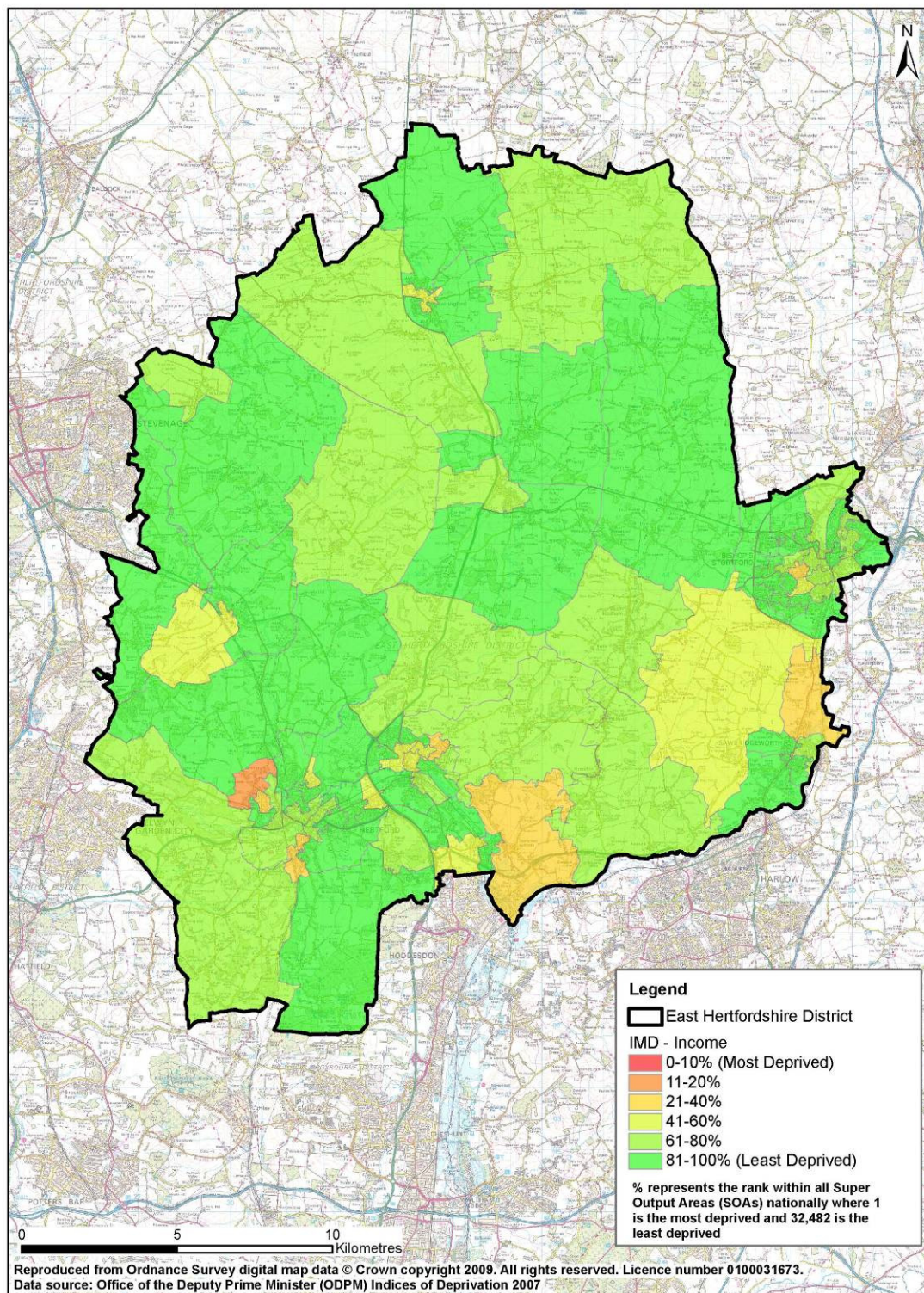
¹⁴⁴ Ibid.

Table 11: Earnings by residence (2008)

Pay	East Herts (£)	East of England (£)	Great Britain (£)
Gross Weekly Pay			
Full-time workers	590.1	498.7	479.3
Male	655.9	550.0	525.0
Female	509.2	423.7	412.7
Hourly Pay			
Full-time workers	15.75	12.44	12.01
Male	16.95	13.27	12.72
Female	13.89	11.26	10.96

- 13.4.10 Spatially, Figure 21 confirms the district's relative prosperity but also identifies that there are some less prosperous areas in terms of income scattered throughout the district in both urban and rural areas. It should be noted that although IMD values provide an accurate reflection of the state of affairs within different areas, there is the potential for overall values for certain areas to mask disparities within them.

Figure 21: IMD 2007 – Income



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- 13.4.11 In terms of VAT registered businesses (2007) East Herts performed adequately (9.9), coming in between the East of England (9.6) and National (10.2) percentages as a portion of stock. It is unclear at the moment how the most recent recession has affected the district relative to other areas.¹⁴⁵
- 13.4.12 Jobseeker's Allowance (JSA) - which is payable to people under pensionable age who are available for, and actively seeking, work of at least 40 hours a week – claimant rates for East Herts are 2.3% (where % is a proportion of resident working age population of area) less than East of England (3.4%) and Great Britain (4.1%) rates.¹⁴⁶

Are there any evidence gaps?

- 13.4.13 The full impact of the most recent economic recession on East Herts is not known.

13.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 13.5.1 It is always difficult to predict local economic trajectories and extremely difficult to consider what the situation within East Herts will be without the plan. Within the case of economy and employment it is perhaps most appropriate to consider the spatial nature of economic development without the plan rather than identify broader trend possibilities. Within this framework two key issues stand out. First, without the plan it is not clear whether the main settlements within the district would be capable of providing the required facilities or supportive infrastructure to deliver growth ambitions set out in the RSS. Second, there is a likelihood that the development of rural areas and smaller villages within the district would not be sufficiently supported by an appropriate policy framework which allows these areas to retain their character but to develop in a sympathetic manner.

13.6 What issues should be a particular focus for the appraisal?

- 13.6.1 In light of the information above, key issues to take into account in the appraisal in relation to economy and employment include:
- The need to ensure that jobs are created in an appropriate manner and scale across all parts of the district
 - The need to ensure that opportunities to capitalise on the benefits which may emerge through the expansion of Stansted Airport
 - The need to ensure that job creation is matched by the provision of appropriate facilities and infrastructure
 - The need to ensure that policies will help to encourage greater rates of GVA growth.

¹⁴⁵ NOMIS (2009). *Labour market profile: East Hertfordshire* [online] available at: <https://www.nomisweb.co.uk/reports/lmp/la/2038431795/report.aspx> (accessed 5 August 2009).

¹⁴⁶ Ibid.

14 Historic environment

14.1 Introduction

- 14.1.1 East Herts is fortunate to have a rich heritage in terms of its man-made environment with individual buildings, townscapes and villages of historic and architectural importance. Scheduled Ancient Monuments (SAMs), archaeological sites, historic parks and gardens and the natural landscape come together in contributing to the district's special character and 'sense of place'¹⁴⁷.

14.2 What's the policy context?

- 14.2.1 PPS1: on Delivering Sustainable Development¹⁴⁸ highlights the need to protect and enhance the historic environment. PPG15: Planning and the historic environment (1994)¹⁴⁹ states that planning policies can not only reduce threats to the historic environment but also increase its contribution to local amenity. Heritage can also act as a catalyst for regeneration¹⁵⁰. PPG16 highlights the need to reconcile development pressures with the interests of archaeology and historic conservation. It further emphasises the principle of early assessment to ensure that remains are not needlessly destroyed, that development proposals take into account archaeological interest and that important remains are preserved in situ.
- 14.2.2 Draft PPS15: Planning for the Historic Environment consultation closes at the end of October 2009 and will replace PPG15 and PPG16: Archaeology and Planning. It is intended to reflect a more modern, integrated approach which defines the historic environment in terms of heritage assets to be conserved in accordance with a set of principles and in proportion to their significance - it also separates policy from guidance. Policy HE1. Evidence base for plan-making states that LPAs should ensure that they have evidence about the historic environment, and heritage assets in particular, in their area and that this is publicly documented. The historic evidence should be used to '*assess the extent, significance and condition of known heritage assets and their contribution that they may make to future development in the area.*' Consideration must also given to the discovery of new heritage assets.
- 14.2.3 The issue of the historic environment is a cross-cutting theme within the East of England Plan and several policies and their supportive text make reference to its protection and utilisation for purposes such as cultural promotion and tourism. Policy **ENV6: The Historic Environment** provides direct guidance for LPAs and instructs them to identify, protect, conserve, and, where appropriate, enhance the region's historic environment. Clearly it is not the role of the LDF to provide all these functions however, spatial planning will play a key part in the preservation of East Herts' historic environment primarily through the protection of certain key areas through sound, evidence-based studies. The policy also provides a holistic definition of the region's historic environment as its '*archaeology, historic buildings, places and landscapes, including historic parks and gardens and those features and sites (and their settings) especially significant*

¹⁴⁷ East Herts District Council (no date). *What are conservation areas?* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=1355> (accessed 6 August 2009).

¹⁴⁸ ODPN (2005) *Planning Policy Statement 1: Delivering Sustainable Development* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement1> (accessed 21 July 2009).

¹⁴⁹ CLG (1994) *Planning Policy Guidance 15: Planning and the Historic Environment* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/policyguidance/historicenvironment/ppg15/> (accessed 23 June 2009).

¹⁵⁰ DCMS (2001) *The historic environment: a force for our future* [online] available at: http://www.culture.gov.uk/reference_library/publications/4667.aspx/ (accessed 21 July 2009).

in the East of England." In addition, Policy **ENV7: Quality in the Built Environment** provides criteria that new development should achieve in order to be of high quality and complement the distinctive character and best qualities of the location area it is located and to promote urban renaissance and regeneration.

14.3 What are the key objectives and other decision-making criteria that we need to consider?

14.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

- Conserve, restore and enhance the region's natural and built environment

14.4 What's the situation now? (including any existing problems)

14.4.1 The historic settlement pattern of East Herts is dictated to a large degree by rivers and they have played a role in the contemporary spatial profile of the district which consists of five historic market towns (Bishop's Stortford, Hertford, Ware, Sawbridgeworth and Buntingford), and over a hundred villages and hamlets of varying sizes¹⁵¹.

14.4.2 Historic features include¹⁵²:

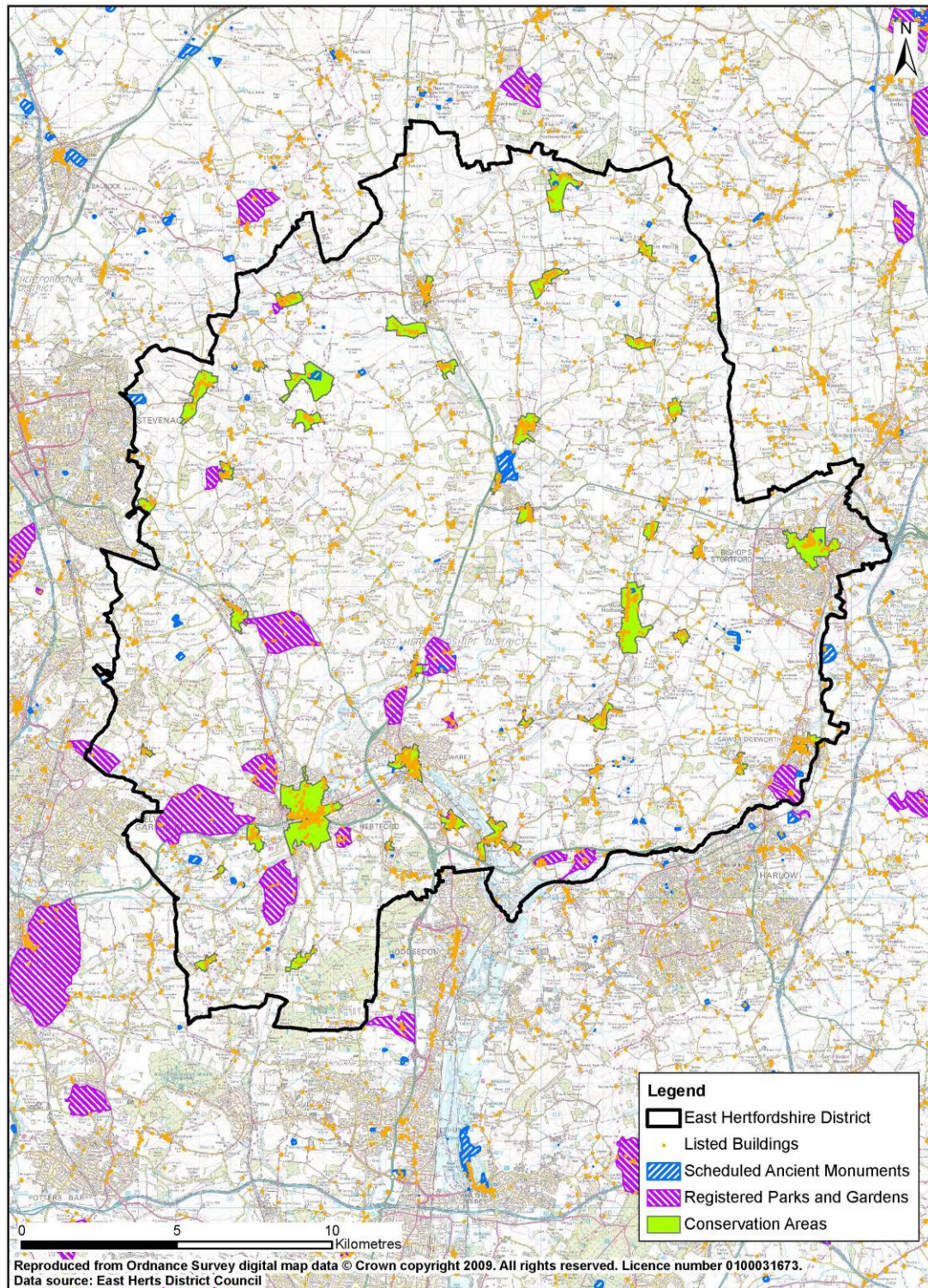
- The centres of all five main towns and 40 villages are designated as conservation areas;
- Over 4,000 listed buildings including over 1% designated as Grade 1 Listed of exceptional interest;
- 42 Scheduled Ancient Monuments;
- 450 sites of archaeological significance (This number is based on the Local Plan proposals map, and does not reflect later additions or non-designated sites, for example in the Historic Environment Record);
- 15 Registered Parks and Gardens and a number of locally important historic parks and gardens;
- Five museums which are located in Bishop's Stortford, Datchworth, Hertford, Much Hadham and Ware;
- A heritage centre in Buntingford and the Henry Moore Foundation in Perry Green.

14.4.3 Historic environmental constraints are shown in Figure 22. This map reveals that historic designations are scattered throughout the district and that there are several large swathes of Registered Parks and Gardens, particularly towards the south of the district and around Hertford.

¹⁵¹ East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/q/f/Item_5_170409.pdf (accessed 4 August 2009).

¹⁵² Ibid.

Figure 22: Historic constraints in East Herts



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- 14.4.4 In addition to designated historic sites, the Hertfordshire Historic Environment Record (HER) contains information on 3,822 known historic sites and assets in the district. This extensive record highlights the significant amount of historical assets within East Herts.
- 14.4.5 A significant challenge facing East Herts is to maintain the historic and rural character of the district whilst accommodating significant development and growth¹⁵³.

Are there any evidence gaps?

- 14.4.6 There is considerable potential within the district for many as yet unknown archaeological sites worthy of potentially national designation (Scheduling). These sites may act as a material constraint on development and should be identified.

14.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 14.5.1 Without the plan it is possible that inappropriate development may proceed within the district given the high levels of development and growth that are anticipated. Additionally, without the plan it is possible that many of the opportunities for the historic environment to contribute towards sustainable forms of growth may be lost.

14.6 What issues should be a particular focus for the appraisal?

- 14.6.1 In light of the information above, key issues to take into account in the appraisal in relation to the historic environment include:
- The need to protect the district's historic environmental assets (both designated and non-designated) from inappropriate development
 - The need to appreciate and capitalise on the potential that historic assets have to contribute towards place-shaping through their distinctive character and inspiration for design of further development
 - The need to be aware of the potential for unknown historic sites as a potential material constraint on development

¹⁵³ East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/g/f/Item_5_170409.pdf (accessed 4 August 2009).

15 Housing

15.1 Introduction

- 15.1.1 Housing is a key policy theme, high on the agenda of both the Government and the public. Part of the Government's aim to create prosperous, inclusive and sustainable communities is that everyone should have the opportunity of living in a decent home at a price they can afford, in a place in which they want to live now and in the future.

15.2 What's the policy context?

- 15.2.1 The Government's key housing policy goal, as set out in PPS3: Housing¹⁵⁴, is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. In particular, the planning system should deliver a "*sufficient quantity of housing taking into account need and demand and seeking to improve choice*". Both PPS3 and PPS1: Sustainable Development highlights the need to provide affordable housing.
- 15.2.2 The East of England Plan states that at least 508,000 net additional dwellings should be provided by LPAs within the region over the period 2001 to 2021. The indicative minimum that must be provided within East Herts over this period is 12,000 (which does not include urban extensions to Harlow – see Policy HA1 of the East of England Plan). However, the supportive text for **Policy E7: The Region's Airports** states that the housing allocations for East Herts should be sufficient for both airport-related and other housing needs although this will need to be kept under review as Stansted Airport develops.
- 15.2.3 Within this overall housing requirement DPDs should set appropriate targets for affordable housing and provision should be made by local authorities for site/pitches to meet the identified needs of Gypsies and Travellers living within or resorting to their area.
- 15.2.4 The general spatial approach taken by the Plan is to concentrate development in urban areas to reflect the polycentric nature of the East of England. To support this ambition Policy **SS3 Key Centres for Development and Change** (KCDC) identifies locations where new development should be concentrated. While none are within East Herts, nearby KCDCs (the impacts of which must be considered by the LDF) include Harlow, Stevenage, Hatfield and Welwyn Garden City.
- 15.2.5 In addition, in February 2006 the Government issued revised guidance (Planning Circular 01/06¹⁵⁵) in respect of Gypsies and Travellers. Evidence had shown that the previous guidance had failed to deliver adequate sites for Gypsy & Travellers in many areas in England. The new guidance also states that local authorities must allocate sufficient sites for gypsies and travellers in their LDF to meet the requirements identified in the relevant regional plan.
- 15.2.6 Although the Government published the East of England Plan in May 2008, the number of additional Gypsy & Traveller pitches that each district will be required to provide was not established. Therefore, the Government has since undertaken a Single Issue Review to the East of England Plan in respect of gypsies and travellers. An Accommodation Needs Assessment was undertaken in 2006 to determine whether there is a need for increased provision for pitches

¹⁵⁴ Communities and Local Government (2006) *Planning Policy Statement 3: Housing* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing> (accessed 18 September 2009).

¹⁵⁵ ODPM (2006). *Circular 01/06: Planning for Gypsy and Traveller Caravan Sites* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/circulargypsytraveller> (accessed 25 September 2009).

for Gypsies and Travellers within Hertfordshire. This study found that there was need for a total of an additional 35 pitches across the five authorities by 2011. Of these, East Herts is required to provide 15 pitches by 2011.¹⁵⁶ However, the East of England Single Issue Review of the East of England Plan¹⁵⁷ states that there should be 25 minimum additional pitches in East Herts during the period 2006-2011.

15.2.7 The Council and its housing providers (in particular the two main Registered Social Landlords – Riversmead Housing Association (HA) and South Anglia HA) have set out a long-term vision for housing across all tenures in its Housing Strategy and associated Homeless and Homeless Prevention Strategy (both 2008)¹⁵⁸. In collaboration with the London Commuter Belt Sub-Regional Housing Group three strategic objectives have been set. These are:

- Maximise the delivery of a range of new affordable homes to meet diverse need;
- Improve the condition of the housing stock both public and private
- Build sustainable and thriving neighbourhoods and communities.

15.3 What are the key objectives and other decision-making criteria that we need to consider?

15.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

- Promote sustainable growth within environmental limits
- Reduce poverty and inequality and promote social inclusion
- Reduce greenhouse gas emissions
- Conserve, restore and enhance the region's natural and built environment
- Move goods and people sustainably
- Meet the needs of the changing regional demographic
- Provide decent, affordable and safe homes for all.

15.4 What's the situation now? (including any existing problems)

15.4.1 There were a total of 56,252 dwellings registered in East Herts as of 1st April 2007. Approximately 86% of these properties were owner occupied or privately rented compared to 81% for England as a whole. The social rented sector however, accounts for 14% of the housing compared to 18.4% for England.¹⁵⁹

15.4.2 East Herts is an attractive place to live and this has contributed to high house prices which increased by 18% between 2005 and 2007. However, these price increases have contributed

¹⁵⁶ East Herts District Council (2008). *Housing strategy 2008 – 2011* [online] available at:

http://80.168.51.108/media/pdf/2/2/Housing_Strategy_-_Consultation_document.pdf (accessed 6 August 2009).

¹⁵⁷ EERA (2009). *Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: a revision to the Regional Spatial Strategy for the East of England* [online] available at:

http://www.gos.gov.uk/gos/docs/Planning/Regional_Planning/808762/gandtpolicies.pdf (accessed 17 September 2009).

¹⁵⁸ East Herts District Council (2008). *Housing strategy 2008 – 2011* [online] available at:

http://80.168.51.108/media/pdf/2/2/Housing_Strategy_-_Consultation_document.pdf (accessed 6 August 2009).

¹⁵⁹ East Herts Local Strategic Partnership (2009). *Everyone Matters: a sustainable community strategy for East Herts 2009 to 2024* [online] available at: http://80.168.51.108/media/pdf/q/f/Item_5_170409.pdf (accessed 4 August 2009).

towards a growing number of households that are unable to obtain appropriate private accommodation. Figure 23 shows a breakdown of price increases during this period by property type.¹⁶⁰ The areas of highest demand are located in Hertford and the northern villages where average prices are in excess of £250,000. The lowest prices are seen in the north western villages of Benington, Walkern and Ashton where prices average approximately £160,000.¹⁶¹

Figure 23: Price increases by property type in East Herts¹⁶²

Property Type	Average Price All Quarters 2005	Average Price First Quarter 2007	% Change
Flats & Maisonettes	170,225	187,700	10.3%
Detached	434,525	548,200	26.2%
Semi-detached	261,125	293,900	12.6%
Terraced	214,875	246,300	14.6%
All Properties	270,188	319,025	18.1%
County All properties	217,889	225,900	3.7%

15.4.3 Within a County context, Hertfordshire has experienced the smallest levels of house price decreases relative to the East of England Region since the January 2008 peak¹⁶³.

15.4.4 In terms of the condition of the housing stock the Council commissioned a Housing Stock Condition Survey in 2004. This revealed that¹⁶⁴:

- there were 940 empty dwellings within the district
- the private rented sector showed the highest urgent repair costs (i.e. needing to be done within the next year) as did vacant and older dwellings;
- Approximately 7.4% of dwellings required a mandatory response under the Health and Safety Rating System. This compares to the estimated level of unfitness of 3% and the main hazards related to excessive cold and falls on stairs;
- The average energy efficiency rating was 51 which is comparable with the national and regional average; and
- 5.4% of houses were in fuel poverty (i.e. needing to spend more than 10% of their income on fuel in order to keep warm).

15.4.5 Average house prices in East Herts have increased by 117% over the period 2000 to 2008, compared with Broxbourne (94%), Epping Forest (133%), Harlow (111%), and Uttlesford (85%).

15.4.6 Levels of homelessness in East Herts have reduced over the last four years due to the implementation of homeless prevention and housing options measures. Figure 24 shows a

¹⁶⁰ East Herts District Council (2008). *Housing strategy 2008 – 2011* [online] available at: http://80.168.51.108/media/pdf/2/2/Housing_Strategy_-_Consultation_document.pdf (accessed 6 August 2009).

¹⁶¹ East Hertfordshire District Council (2007). *Housing capacity study*.

¹⁶² East Herts District Council (2008). *Housing strategy 2008 – 2011* [online] available at: http://80.168.51.108/media/pdf/2/2/Housing_Strategy_-_Consultation_document.pdf (accessed 6 August 2009).

¹⁶³ Insight East (2009). *East of England recession impact*.

¹⁶⁴ East Herts District Council (2008). *Housing strategy 2008 – 2011* [online] available at: http://80.168.51.108/media/pdf/2/2/Housing_Strategy_-_Consultation_document.pdf (accessed 6 August 2009).

¹⁶⁶ East Herts District Council (2008). *Housing strategy 2008 – 2011* [online] available at: http://80.168.51.108/media/pdf/2/2/Housing_Strategy_-_Consultation_document.pdf (accessed 6 August 2009).

dramatic decline in the number of approaches to the Council's Homeless Service but a relatively consistent percentage of households that, after investigation, have been accepted as homeless.

Figure 24: Homelessness in East Herts

	2004/05	2005/06	2006/07	2007/08
Homeless applications	254	215	117	106
Homeless Acceptances	142	120	56	64
Percentage of acceptances against applications	56%	56%	48%	60%

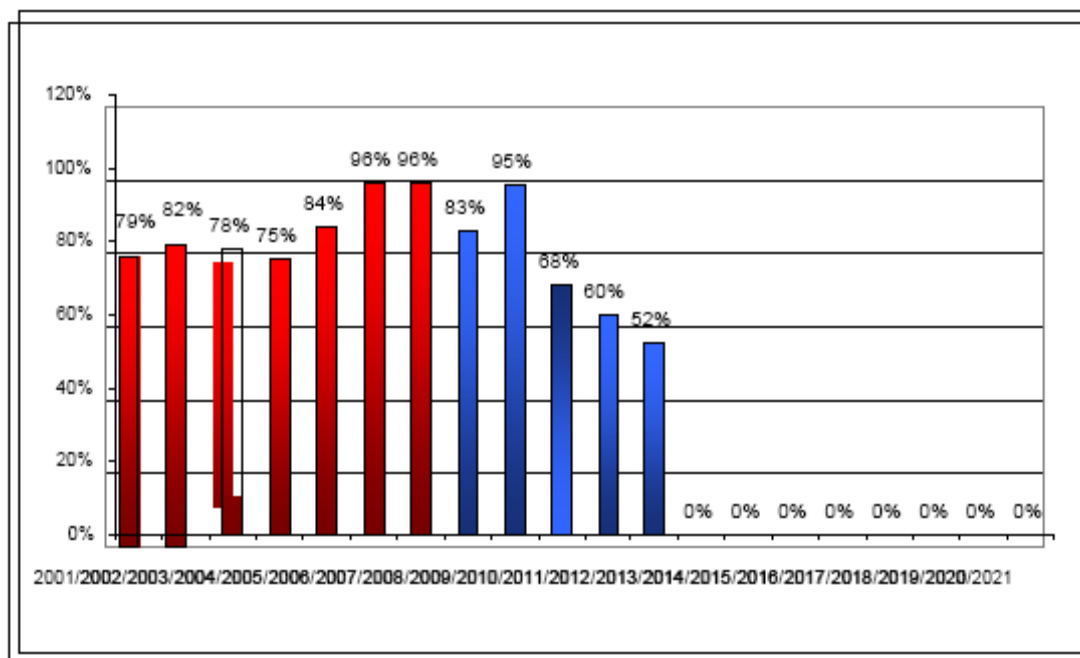
- 15.4.7 EERA has estimated that within the East of England there is need for 1,220 additional caravan pitches for Gypsies and Travellers by 2011. Additionally, research confirms that a lack of good quality sites is linked to Gypsies and Travellers experiencing poorer health and educational outcomes compared to any other disadvantaged group.¹⁶⁶
- 15.4.8 Figure 25 shows the annual dwelling completion rate in East Herts in comparison with the housing requirements contained within the Adopted Local Plan and the East of England Plan.

Figure 25: Annual dwelling completion rate in East Herts

Source of Plan Target	Plan Period	Total Housing Required	Total Housing Built During Plan Period
Adopted Local Plan Second Review	1991-2011	11,100	9,608
East of England Plan (RSS14)	2001-2021	12,000	3,479

- 15.4.9 The percentage of new and converted dwellings on previously developed land (PDL) was 96% in 2007/2008. This compares favourably with the national target of 60% however, it may be difficult for the council to maintain this rate given the 12,000 additional dwellings it is required to provide between 2001 and 2021. As shown in Figure 26 the percentage of new and converted dwellings on PDL has consistently remained above the national target although the trajectory indicates that the council will need to identify more sites through the LDF process.

Figure 26: PDL completions and projections¹⁶⁷



15.4.10 There is a shortage of affordable housing within East Herts and this situation is likely to continue thus demanding that a significant proportion of new dwellings are affordable. In 2005 there was a total affordable housing need of 787 units per year and the net annual outstanding need is for 484, after allowing for existing stock re-let supply¹⁶⁸. In 2007/08 only 177 affordable homes were completed, however, this represents 30% of all completed dwellings within the district¹⁶⁹.

15.4.11 It is anticipated that the mid-2007 population of East Herts was 134,000 and could be projected to rise to 145,900 by 2021 according to a population-led projection. The 2006-based household projections was estimated in 2006 to be 55,000 and is expected to rise to 64,000 by 2021¹⁷⁰.

Are there any evidence gaps?

15.4.12 The full extent of the impacts from the current recession on house building and the housing market in East Herts is unknown at this stage.

¹⁶⁷ East Herts District Council (2009). *Annual Monitoring Report* [online] available at: http://80.168.51.108/media/pdf/b/o/AMR_07-08.pdf (accessed 5 August 2009).

¹⁶⁸ East Herts District Council (2008). *Affordable housing & lifetime homes* [online] available at: http://80.168.51.108/media/pdf/m/c/Affordable_Housing_SPD_-_inc_Front_Cover.pdf (accessed 6 August 2009).

¹⁶⁹ East Herts District Council (2009). *Annual Monitoring Report* [online] available at: http://80.168.51.108/media/pdf/b/o/AMR_07-08.pdf (accessed 5 August 2009).

¹⁷⁰ EERA (2009). *Chelmer model runs for the East of England Plan Review* [online] available at: <http://www.eera.gov.uk/GetAsset.aspx?id=fAAzADYAMAAyAHwAfABGAGEAbABzAGUAfAB8ADAAfAA1> (accessed 24 February 2010).

15.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 15.5.1 Without the plan it is unlikely that the national PDL target will be achieved, leading to potentially unsustainable development. In addition, there is an under provision of affordable housing within the district and it is unlikely that this situation will be remedied without the plan.
- 15.5.2 Without the plan it is unlikely that a sufficient quantum of land will be brought forward for the delivery of housing with the result that the (minimum) 12,000 new dwellings apportioned to the district by the RSS will not be delivered.
- 15.5.3 The trend towards an ageing population would mean that there may be a shortage of housing appropriate for elderly and disabled people. The application of lifetime homes standards to new housing development can assist in addressing the problem.

15.6 What issues should be a particular focus for the appraisal?

- 15.6.1 In light of the information above, key issues to take into account in the appraisal in relation to housing include:
- To increase the provision of affordable housing
 - To ensure that the appropriate levels of new dwellings are provided over the plan period
 - To ensure that national PDL targets are met
 - To ensure that the housing needs of an ageing and disabled population are met
 - The need to provide additional Gypsy and Traveller pitches, and to ensure that new site pitches are located with adequate access to services in line with the East of England Plan

16 Land

16.1 Introduction

- 16.1.1 East Herts covers an area of 477 square kilometres (184 square miles) and comprises approximately one third of the area of Hertfordshire. Located in the southwest of the East of England Region the district has traditionally been viewed as rural however, because of its location near to the northern fringe of Greater London, East Herts can also be described as 'peri-urban'. While approximately the southern third of the district is designated as Metropolitan Green Belt, there are three New Towns (Stevenage, Harlow and Welwyn Garden City) immediately adjacent to its borders.¹⁷¹
- 16.1.2 Waste has traditionally been seen as an unavoidable by-product of increased prosperity and economic activity. In more recent years the development of new products and materials, and changes in the way they are used has led to a steady growth in the amount and a change in the nature of the waste produced. Disposal of waste has been predominantly to landfill, which has led to environmental problems, including greenhouse gas emissions and liquid pollutants (although modern landfill sites are now much more tightly regulated). More recently, increasing concern about the environmental impacts of landfill has led to investigation into alternatives that are more sustainable. Integrated waste management planning is now seen as best practice. Integrated or sustainable waste management attempts to segregate the various components of the waste stream and to manage each in an environmentally sound and economically efficient manner, making use of waste as a resource wherever possible.

16.2 What's the policy context?

Land

- 16.2.1 PPS3 on Housing¹⁷² sets a national target that 60% of new dwellings should be built on previously developed land. It also suggests that the density of new residential dwellings should be at least 30 dwellings per hectare to help ensure efficient use of land. The East of England Plan supports this policy and with reference to the phasing of housing development Policy **H3** states that "*the re-use of previously developed land and buildings will be promoted as the first priority*". Additionally, Policy **SS2** states that 60% of development is to be on previously developed land (this encompasses all development, not just housing). The approach to the location of major development must prioritise the re-use of previously developed land in and around urban areas to the fullest extent possible.
- 16.2.2 The 1990 Environmental Protection Act requires local authorities to secure the appropriate remediation of contaminated land and to maintain a register of contaminated land. PPS23 sets the framework under which land contamination from previous brownfield use is to be managed and sets out the criteria against which applications for potentially polluting developments will be considered.

¹⁷¹ East Herts District Council (2009). *East Herts draft spatial portrait*.

¹⁷² ODPM (2000) *Planning Policy Statement 3: Housing* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing> (accessed 17 July 2009).

- 16.2.3 PPG2: Green Belts¹⁷³ contains a presumption against any development in the green belt that detracts from its purposes which are:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns from merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 16.2.4 In the East of England Plan **Policy SS7: Green Belt** states that the broad extent of green belts in the East of England is appropriate and should be maintained. However, strategic reviews of green belts are needed in several areas to meet regional development needs at the most sustainable locations. This includes Harlow, involving land in East Herts and this review “*should identify compensating strategic extensions to the Green Belt in East Herts...*”
- 16.2.5 PPS7 on Sustainable Development in Rural Areas states that new development in the open countryside should be strictly controlled and that priority should be giving to the re-use of previously developed or brownfield land, except in cases where there are no brownfield sites available or these brownfield sites perform poorly in terms of sustainability in comparison with greenfield sites, including accessibility by public transport, walking and cycling, high quality design and inclusiveness. PPS7 also mentions that where significant development of agricultural land is unavoidable, areas of poorer quality should be used in preference to the best and most versatile agricultural land (grades 1, 2 and 3a of the Agricultural Land Classification). Development plans should include policies that identify any major areas of agricultural land planned for developments and may also include policies that protect the best and most versatile areas from development.
- 16.2.6 Policy **ENV4** of the East of England Plan states that agri-environment schemes should be promoted to “*maintain and enhance the quality of soils*”, and that the sustainable use of soil resources should be encouraged, and where soil and land have been degraded, there is the need to maximise opportunities for restoration to beneficial after-uses such as agriculture, woodland, amenity and habitat creation schemes.

Waste

- 16.2.7 According to PPS10 Planning for Sustainable Waste Management (2005)¹⁷⁴ all planning authorities should, to the extent appropriate to their responsibilities, prepare and deliver planning strategies that:
- help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for;
 - enable sufficient and timely provision of waste management facilities to meet the needs of their communities;

¹⁷³ ODPM (1995, amended 2001) *Planning Policy Statement 2: Green Belt* [online] available at: <http://www.communities.gov.uk/publications/planningandbuilding/ppg2> (accessed 22 July 2009).

¹⁷⁴ CLG (2005) *Planning Policy Statement 10: Planning for Sustainable Waste Management* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/147411.pdf> (accessed 1 July 2009).

- help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations;
- protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries; and
- ensure the design and layout of new development supports sustainable waste management.

16.2.8 The East of England Plan sets out targets for waste management (Policy **WM2**). The objectives are to eliminate the landfilling of untreated municipal and commercial waste by 2021 and secure at least the following minimum levels of recovery:

- Municipal waste – recovery of 50% at 2010 and 70% at 2015;
- Commercial and industrial waste – recovery of 72% at 2010 and 75% at 2015.

16.2.9 In accordance with national and regional guidance, the Minerals Local Plan includes policy to resist the sterilisation of minerals when other development is proposed by encouraging its prior extraction. The map from the Hertfordshire County Council Minerals Local Plan showing the location of existing sites and preferred areas can be found at <http://www.hertsdirect.org/infobase/docs/pdfstore/locationmap.pdf>.

16.3 What are the key objectives and other decision-making criteria that we need to consider?

16.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

- Promote sustainable growth within environmental limits
- Increase resource efficiency and reduce resource use and waste
- Conserve, restore and enhance the region's natural and built environment.

16.4 What's the situation now? (including any existing problems)

16.4.1 The industrial history of East Herts does not suggest that major areas of ground contamination will be found however, it is more likely that modern day land uses have introduced contamination. These include the following types of land uses¹⁷⁵:

- Petrol filling stations
- Gas works
- Railways
- Electricity transformers
- Landfill sites
- Light and medium engineering facilities

¹⁷⁵ East Herts District Council (no date). *Key features of East Hertfordshire in relation to contaminated land* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=1865> (7 August 2009).

- Uncontrolled waste deposits.

16.4.2 Within East Herts there are several environmentally sensitive features including¹⁷⁶:

- SSSIs, SAC, SPA and RAMSAR sites
- Nature reserves
- Vulnerable major water aquifers
- Source protection zones
- Surface waters.

16.4.3 In particular, the groundwater environment where major aquifers are exposed to the surface are likely to be very sensitive to contamination and priority needs to be given to their protection.¹⁷⁷ Figure 27 shows groundwater vulnerability for the East of England in relation to waste planning authority areas. This map reveals that a significant amount of land within the northern part of East Herts is located above a major aquifer. In East Herts the vulnerable major aquifers occur where chalk outcrops appear at surface level, which is the case north of Bishop's Stortford.¹⁷⁸ In addition, there are source protection zones in the north of the district.¹⁷⁹

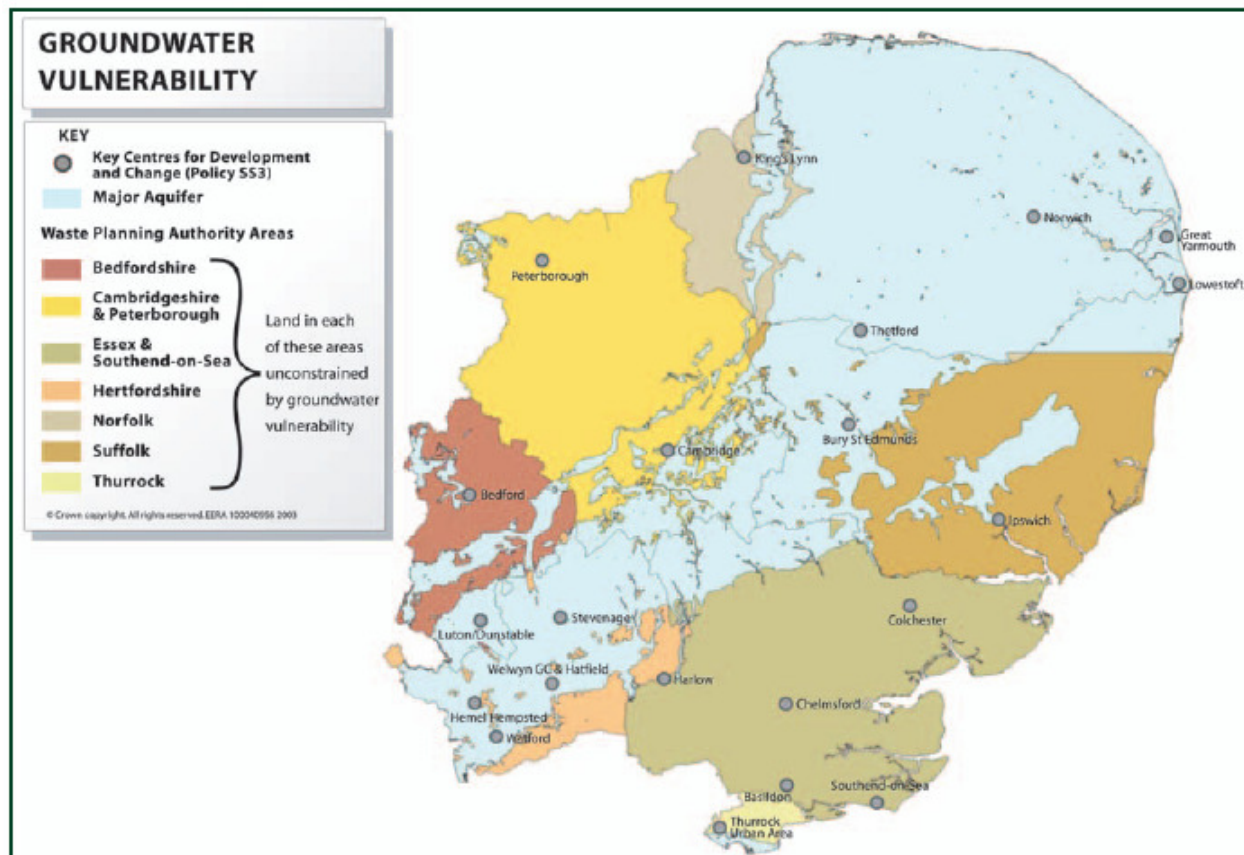
¹⁷⁶ Ibid.

¹⁷⁷ East Herts District Council (no date). *Key features of East Hertfordshire in relation to contaminated land* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=1865> (7 August 2009).

¹⁷⁸ East Herts District Council (2007). *Contaminated land strategy* [online] available at: http://80.168.51.108/media/pdf/s/c/Contaminated_Land_Strategy_-_Dec_2007.pdf (accessed 7 August 2009).

¹⁷⁹ Ibid.

Figure 27: Groundwater vulnerability¹⁸⁰



- 16.4.4 The dominant geological formation in East Herts is the chalk overlain by London Clays. The most common mineral deposits found in East Herts are sands and gravels, known as aggregates. There are also deposits of chalk and brick clay. Within East Herts there are a number of mineral extraction sites.¹⁸¹
- 16.4.5 While Hertfordshire County Council is the Waste Disposal Authority (WDA), all districts and boroughs comprising the county have formed the Hertfordshire Waste Partnership (HWP). Within this overarching partnership, each district provides a variety of services to residents for the collection of refuse and recycling. Although these arrangements may shortly change¹⁸², East Herts provides weekly refuse collection, fortnightly dry recycling and organic waste collection.¹⁸³
- 16.4.6 Within East Herts the percentage of waste recycled was 29.9% (significantly less when compared to the county average of 38.5%). Total waste per head (Kg) was 419kg (considerably less than

¹⁸⁰ EERA (2008). *East of England Plan* [online] available at:

http://www.gos.gov.uk/goee/docs/Planning/Regional_Plan/Regional_Spatial_Strategy/EE_Plan1.pdf (accessed 4 August 2009).

¹⁸¹ East Herts District Council (2007). *Contaminated land strategy* [online] available at:

http://80.168.51.108/media/pdf/s/c/Contaminated_Land_Strategy_-_Dec_2007.pdf (accessed 7 August 2009).

¹⁸² See: East Herts District Council (2009). *Recycling and waste road shows* [online] available at:

<http://www.eastherts.gov.uk/index.jsp?articleid=9177> (accessed 7 August 2009).

¹⁸³ Hertfordshire Waste Partnership (2007). *Hertfordshire municipal waste management strategy: baseline report* [online] available at: <http://www.wasteaware.org.uk/strategy/baselinerereport.pdf> (accessed 7 August 2009).

the county average of 504 Kg). Total waste per house was 974 kg (considerably less than the county average of 1,168)¹⁸⁴.

- 16.4.7 Landfill sites are also sources of potential pollution and there are 15 located within East Herts. Their operators and locations are shown in Figure 28.

Figure 28: Landfill sites in East Herts

Operator	Location
RMC Aggregates	Stansted Abbots
Anstey Quarry Co Ltd	Anstey
Bedwell Plant Ltd	Essendon
Bedwell Park	Essendon
CJ Priory Plant Ltd	Hoe Lane, Ware
Frontmark	Ware
Greenham Construction	Waterford
Lyons Landfill Ltd	Gilston
Mr V Green	Colegreen
Pioneer Aggregates	Westmill Road, Ware
St Albans Sand and Gravel	Westmill Quarry, Ware
Star Quarries	Waterhall Quarry, Hertford
Star Quarry Products	Lower Hatfield Road, Hertford
Star Quarry Products	Bunkers Hill
Star Quarry Products	Water Hall Farm, Hertford

- 16.4.8 Historically East Herts has enjoyed a strong agricultural economy and much of the land within the district is in agricultural use. The total land area in East Herts is 47,700 ha; of which 34,361 ha (73%) is farm land¹⁸⁵. Figure 29 shows agricultural land by use type¹⁸⁶.

Figure 29: Agricultural land by use type

Agricultural Land Use Type	% of Agricultural Land Use
Total crops and fallow	64%
Set aside	12%
Permanent grassland	12%
Woodland	5%
Recent and temporary grassland	2%
Rough grazing	1%
All other land	3%

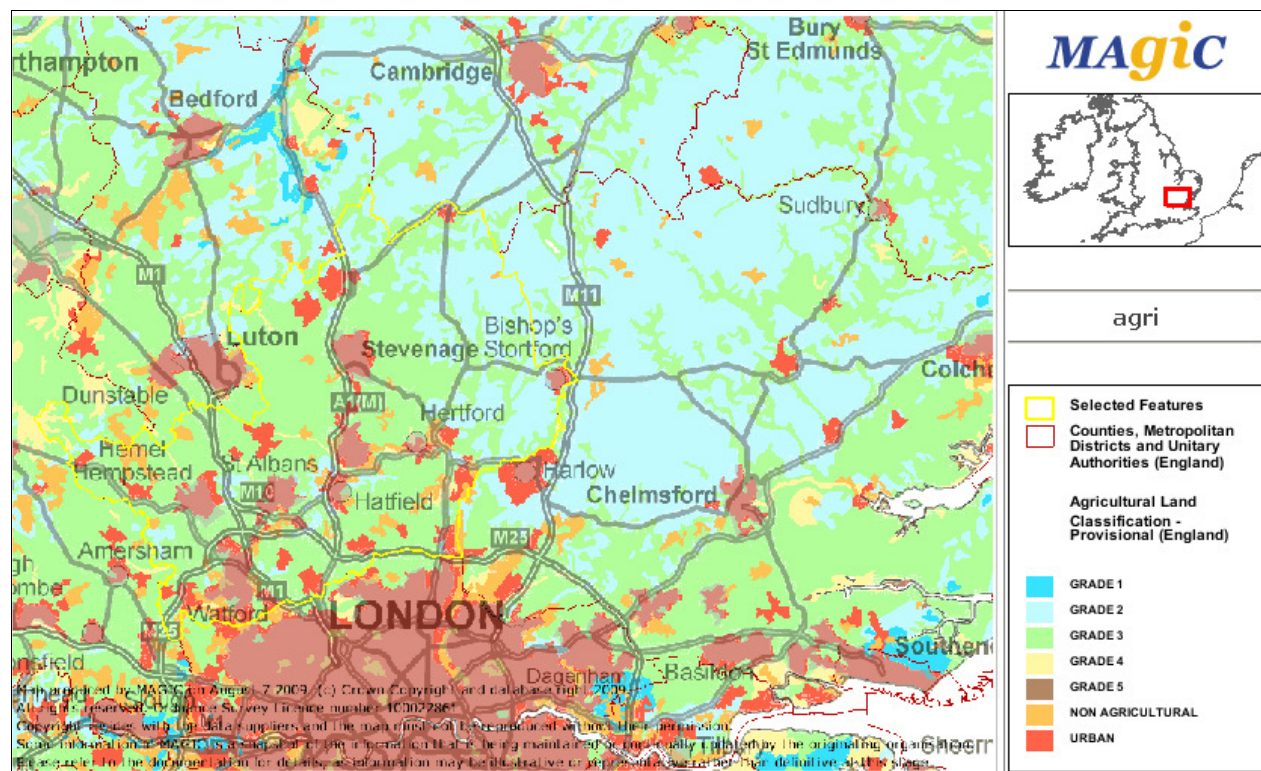
- 16.4.9 The district contains Grade 2 and Grade 3 agricultural land but no areas of Grade 1 (the highest classification). This is roughly highlighted by Figure 30.

¹⁸⁴ Hertfordshire Waste Partnership (2008). *Member meeting minutes* [online] available at: <http://www.wasteaware.org.uk/strategy/minutes/membersgroup210708item10.pdf> (accessed 7 August 2009).

¹⁸⁵ East Herts District Council (2007). *Contaminated land strategy* [online] available at: http://80.168.51.108/media/pdf/s/c/Contaminated_Land_Strategy_-_Dec_2007.pdf (accessed 7 August 2009).

¹⁸⁶ Please note that 'set aside' land was a classification discontinued in 2006.

Figure 30: Agricultural land classification¹⁸⁷



Are there any evidence gaps?

16.4.10 The location of contaminated land within the district is not currently available.

16.4.11 The following National Indicator information has not been identified for East Herts:

- NI 192: Percentage of household waste sent for re-use, recycling or composting
- NI 193: Percentage of municipal waste landfilled.

16.5 What will be the situation without the plan? (the 'business-as-usual' option)

16.5.1 Without the plan East Herts will be required to release greenfield sites to accommodate development targets. This may result in development being located in unsustainable locations such as where they may cause harm to major aquifers.

16.6 What issues should be a particular focus for the appraisal?

16.6.1 In light of the information above, key issues to take into account in the appraisal in relation to land include:

¹⁸⁷ Natural England (2009). *Interactive Maps* [online] available at: www.magic.gov.uk (Accessed 7 August 2009).

- Ensure that development does not contaminate the major aquifer beneath East Herts
- The need to identify, avoid and if appropriate remediate contaminated land in the district
- To increase recycling rates which are poor compared to the County average
- The need to ensure that waste is minimised at the design stage of a development

17 Landscape

17.1 Introduction

- 17.1.1 Landscape is more than just a visual backdrop; it is an invaluable natural and socio-economic resource, which allows us to better understand our locality and helps us to define our sense of place and who we are. A short but comprehensive description of landscape is:

an area, as perceived by people, whose character is the result of action and interaction of natural and/or human factors"

- 17.1.2 Nationally, the most valued landscapes might be found in the countryside, where semi-natural landscapes result from a long interaction of natural and socio-economic factors. However, landscape is a subjective concept that can be used in different situations and at a range of scales. Some landscapes might be of great local importance, even though they would not even be perceived as a distinct landscape by those without local knowledge. This can include landscapes that might be distinctive because of the degree to which they have been modified by humans.
- 17.1.3 It is important to consider landscape in its own right, but it can be seen that landscape is closely linked to a number of other topics for which we are seeking to develop and test through this SA.

17.2 What's the policy context?

- 17.2.1 The UK ratified the European Landscape Convention¹⁸⁸ in 2006. The Convention aims to encourage public authorities to adopt policies and measures for protecting, managing and planning landscape throughout Europe. A number of the Government's Planning Policy Statements provide the policy context for managing the relationship between development and landscape. Importantly, PPS1 states that *"the Government is committed to protecting and enhancing the quality of the natural and historic environment, in both urban and rural areas. Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole."* PPS7 emphasises that planning authorities should ensure that the quality and character of the wider countryside is protected and, where possible enhanced. This includes the protection of locally valued areas that are undesignated nationally, which can be protected through specific policies included in LDFs.
- 17.2.2 The East of England Plan contains a policy dedicated to landscape and many provisions for the consideration of landscape within other policies. Policy **ENV2: Landscape Conservation** emphasises that the highest levels of protection should be afforded to the Region's nationally designated landscapes, and also states that planning authorities and other agencies are advised to implement this policy by developing area-wide strategies, based on Landscape Character Assessments (LCAs); and to give priority to those areas subject to most growth and change. Policy **ENV2** should be complimented by Policy **ENV1 Green Infrastructure**.
- 17.2.3 East Herts District Council published the Landscape Character Assessment SPD in 2008. This provides a structured evaluation of the district's landscapes as well as a strategy and guidelines for conserving and enhancing the character of each character area. The document provides a

¹⁸⁸ More information about the European Landscape Convention is available at:
<http://www.coe.int/t/dg4/cultureheritage/Conventions/Landscape/> (accessed 21 July 2009).

framework for assessing planning applications and other landscape planning, regulation, conservation and management activities

17.3 What are the key objectives and other decision-making criteria that we need to consider?

17.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

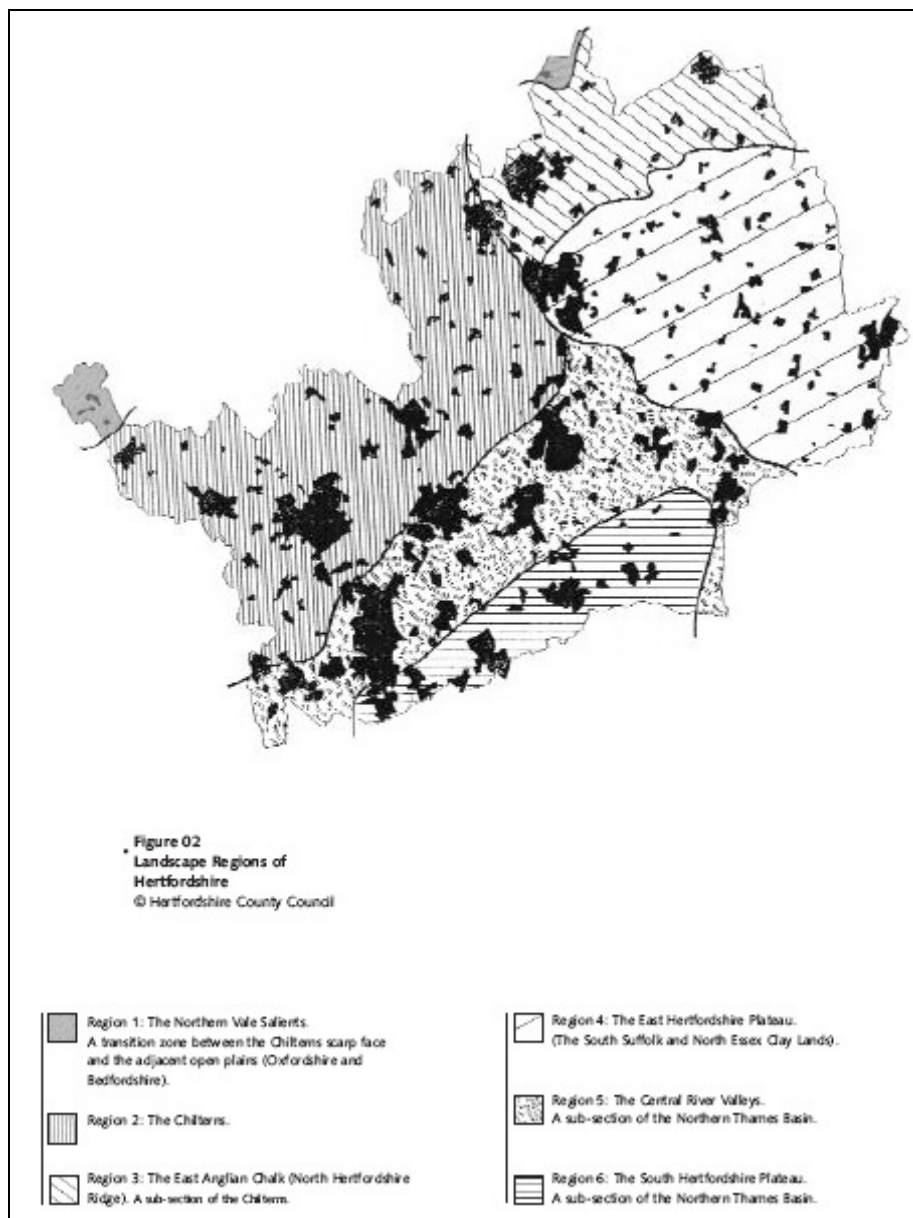
- Promote sustainable growth within environmental limits
- Conserve, restore and enhance the region's natural and built environment.

17.4 What's the situation now? (including any existing problems)

17.4.1 Topographically, East Herts is shaped like a hand with the principal rivers of the Lee, Mimram, Rib, Ash, and Stort forming the five fingers with the higher ground lying in between which is largely comprised of alkaline or neutral chalky soil. Of the six landscape regions identified across Hertfordshire (see Figure 31), three are in East Herts: namely, the East Hertfordshire Plateau; the Central River Valleys; and a small part of the South Hertfordshire Plateau. The East Hertfordshire Plateau is an undulating mixed farmland landscape including both grass and arable land, incised by several river valleys containing small woodlands and an ancient dispersed settlement pattern with towns and villages sited at fords or crossings of Roman roads¹⁸⁹.

¹⁸⁹ East Herts District Council (2009). *Draft spatial portrait*.

Figure 31: Landscape regions in Hertfordshire¹⁹⁰



17.4.2 Woodland accounts for 9% of total land cover equating to an area of 4250 ha - half of which is classified as being ancient. Of this amount 59% is semi-natural broadleaved, and 36% is planted (mainly mixed wood). Grassland accounts for 17% of the district and most of this is improved or semi-improved which are generally species poor. Only 453 ha remain that are unimproved and are of high ecological value. During the period 1970 to 1990 there were significant changes in land use including the loss of agricultural land and woodland¹⁹¹.

¹⁹⁰ East Herts District Council (2008). *Landscape Character Assessment SPD*.

¹⁹¹ East Herts District Council (2007). *Landscape Character Assessment: Sustainability Appraisal to accompany the Adopted Supplementary Planning Document* [online] available at: http://80.168.51.108/media/word/r/s/LCA_Sus_App_-_Sept_2007.doc (accessed 7 August 2009).

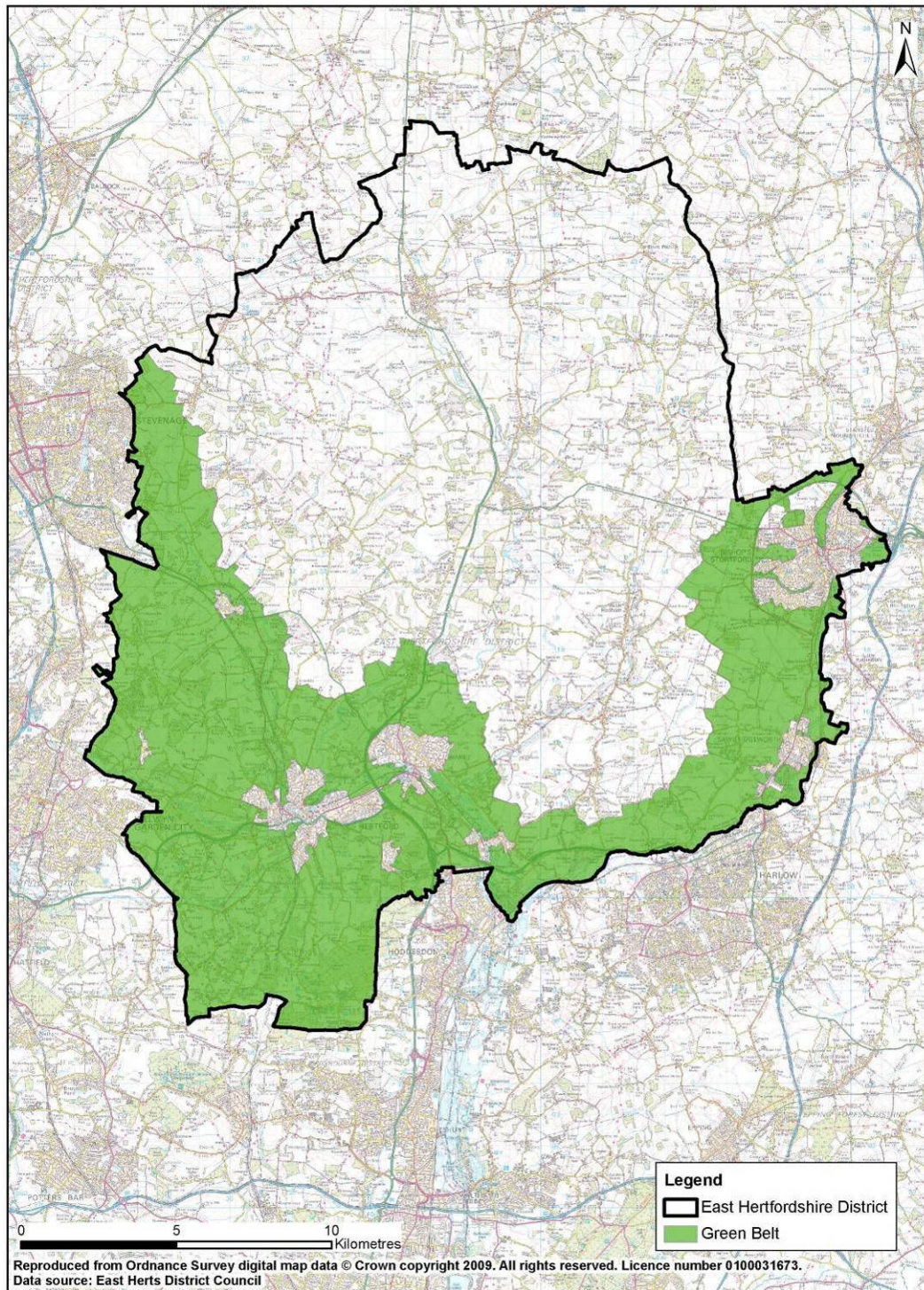
- 17.4.3 While it is difficult to identify the specific environmental problems facing the district, East Herts does face a number of generic problems including¹⁹²:
- Fragmentation of habitats
 - Loss of infrastructure to support the agricultural and rural economy
 - Low river flows during summer months
 - Increasing scarcity of water resources
 - Invasion of non-native species
 - Air and water pollution (including surface and groundwater)
 - Effects of climate change (which may exacerbate the above).
- 17.4.4 A number of external pressures may be driving these problems and could have negative impacts on the landscape. It is because of these reasons that specific policies are required to manage this change. These pressures include¹⁹³:
- Growth at both Stansted and Luton airports
 - Significant population growth within the district, a trend which is expected to continue
 - Increasing levels of traffic
 - 12,000 new dwellings delivered between 2001 and 2021.
- 17.4.5 Both woodland and hedges are an important part of the rural landscape. In the 20th century the greatest threats to parkland were from housing development, the transport infrastructure and mineral extraction, whereas arable farming of former wood pasture retain woodland boundaries and the outline of parks¹⁹⁴.
- 17.4.6 The Metropolitan Green Belt (shown in Figure 32) contains four of the district's five towns and covers one third of the district.

¹⁹² East Herts District Council (2007). *Landscape Character Assessment: Sustainability Appraisal to accompany the Adopted Supplementary Planning Document* [online] available at: http://80.168.51.108/media/word/r/s/LCA_Sus_App_-_Sept_2007.doc (accessed 7 August 2009).

¹⁹³ Ibid.

¹⁹⁴ East Herts District Council (2008). *Landscape Character Assessment SPD*.

Figure 32: Metropolitan Green Belt



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Are there any evidence gaps?

17.4.7 No existing evidence gaps have been identified.

17.5 What will be the situation without the plan? (the 'business-as-usual' option)

17.5.1 East Herts is rich in landscape character assets. Without the plan the distribution of development is unlikely to proceed in the most sustainable manner although the LCA SPD published by the Council will provide a strong degree of guidance to ensure these impacts are minimised.

17.6 What issues should be a particular focus for the appraisal?

17.6.1 In light of the information above, key issues to take into account in the appraisal in relation to landscape include:

- The need to protect the district's landscape assets from inappropriate development
- Where development proceeds, particularly in greenfield areas, there is a need to ensure that landscape assets, such as hedgerows, are protected and integrated to maximise their potential amenity value.

18 Transport

18.1 Introduction

18.1.1 Transport plays a vital role in supporting sustainable development. In economic terms an efficient and well managed transport network connects localities and regions to national and international markets, secures the localised benefits of agglomeration economies and underpins private sector productivity gains. In social terms good connectivity can stimulate labour market flexibility through improvements in accessibility, allowing a wider range of the population to access employment opportunities. Environmental impacts can be reduced by sustainable transport schemes which may include fast, efficient and affordable public transport as well as the provision of walking and cycling infrastructure. East Hertfordshire's LDF should play a key role in encouraging spatial development which leads to sustainable transport patterns in the District and beyond.

18.2 What's the policy context?

18.2.1 PPG13: Transport (2002)¹⁹⁵ states that quality of life depends upon transport and easy access to jobs, shopping, leisure facilities and services. PPG13's objectives include the integration of planning and transport at the national, regional, strategic and local level in order to promote more sustainable transport choices for both people and moving freight; promote accessibility to jobs and services by public transport, walking and cycling; and reduce the need to travel, especially by car. The guidance also recognises the role of walking and cycling in reducing air pollution.

18.2.2 Transport 2010: The Ten-Year Plan (July 2000)¹⁹⁶ and Progress Report (2003) set out a strategy to tackle congestion and pollution by improving all types of transport (rail, road, public and private). Targets include: a 50% increase in rail use (measured by passenger kilometres); an 80% increase in rail freight; and a 10% increase in bus passenger journeys, and the approach is based on:

- integrated transport;
- public and private partnership between the government and private sector; and
- new projects to modernise the transport network.

18.2.3 The Future of Transport: A Network for 2030 White Paper (2004)¹⁹⁷ updated the 'Transport 2010' policies and examined the factors that will shape travel and transport over the next thirty years. It sets out how the Government will respond to the increasing demand for travel, maximising the benefits of transport while minimising the negative impact on people and the environment. Key objectives include: improving the flow on local roads; improving the reliability of buses; encouraging walking and cycling; better management of road networks; using technology to keep people better informed; promoting school and workplace travel plans and public transport improvements; more demand responsive transport; and making services more accessible to improve travel choice.

¹⁹⁵ ODPM (2001) *Planning Policy Guidance 13: Transport* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155634.pdf> (accessed 30 June 2009).

¹⁹⁶ DfT (2000) *Transport Ten Year Plan 2000* [online] available at: <http://www.dft.gov.uk/pgr/regional/policy/transport2010/transport2010meetingthelocal3735> (accessed 30 June 2009).

¹⁹⁷ DfT (2004) *Future of Transport* [online] available at: <http://www.dft.gov.uk/about/strategy/whitepapers/previous/fot> (accessed 30 June 2009).

18.2.4 The Government has recently published Delivering a Sustainable Transport System (DaSTS). This sets out the following five goals that the transport system should deliver:

- To support national economic competitiveness and growth, by delivering reliable and efficient transport networks;
- To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change;
- To contribute to better safety, security and health and longer life expectancy by reducing the risk of death, injury or illness arising from transport and by promoting travel modes that are beneficial to health;
- To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society; and
- To improve the overall quality of life for transport users and non-transport users, and to promote a healthy natural environment.

18.2.5 The East of England Plan contains the Regional Transport Strategy (RTS) to support the spatial development strategy in the plan and provides a framework for the delivery of transport infrastructure and service improvements within the region. This is a two-way process since the Plan should also take account of sub-regional and local strategies and programmes as they evolve. To implement the overall vision of the Plan the RTS gives a clear priority to increasing travel by more sustainable modes, whilst also recognising the importance of the road network. Objectives include:

- managing travel behaviour and the demand for transport with the aim of reducing the rate of road traffic growth;
- encouraging efficient use of existing transport infrastructure;
- enabling the provision of the infrastructure and transport services necessary to support both existing development and that proposed in the spatial strategy; and
- improving access to jobs, services and leisure facilities.

18.2.6 Four areas have been identified as requiring sub-regional treatment as well as the ten Key Centres of Development and Change.

18.2.7 The Hertfordshire Local Transport Plan 2006/07 – 2010/11¹⁹⁸ sets the framework for achieving the vision for a better transport system for the County. It is supported by a number of daughter documents which provide greater detail on key areas of work¹⁹⁹. The County Council is required to set out a range of performance indicators and their associated targets within the Local Transport Plan. Figure 33 shows the 22 indicators and targets that Hertfordshire County Council will be monitoring during the lifetime of the plan. The County are currently preparing LTP3 which will be published in April 2011.

¹⁹⁸ Hertfordshire County Council (2006). *Hertfordshire Local Transport Plan 2006/07 – 2010/11* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/ltp2section1.pdf> (accessed 24 August 2009).

¹⁹⁹ These include the Bus Strategy, Rail Strategy, Rights of Way Improvement Plan, Road Safety Plan, and Accessibility Strategy.

Figure 33: Summary of indicators and targets

Indicator	Baseline (2003/04)	Target (2010/11)
Principal Road Condition	To be established	To be set
Non-Principal Classified Road Condition	19.44%	19.44%
Unclassified Road Condition	19.29%	19.29%
Footway Condition	52%	52%
Killed and Seriously Injured	1084 (1994-98)	No more than 600
Children Killed and Seriously Injured	113 (1994-98)	No more than 56
Total Slight Casualties	5509	No more than 5509
Public Transport Patronage	31 million journeys per year	31 million journeys per year
Bus Service, User Satisfaction	55%	60% (2009/10)
Bus Punctuality	80% (2004/05)	80%
% of people who find it difficult to travel to a local hospital (Accessibility)	29%	24%
Change in Area-Wide Traffic Mileage	20.7 million	22.4 million
Cycling Trips	2397 trips per day (2004/05)	2658 (11% increase)

Indicator	Baseline (2003/04)	Target (2010/11)
Changes in Peak Period traffic flows	Watford - 22553	23284
	St Albans/Hatfield - 16415	17289
Congestion	To be established	To be set
Air Quality	To be established	To be set
Mode Share of Journeys to School	57.5%	60% sustainable modes
Passenger Transport Information, User Satisfaction	39%	50%
Rights of Way	61% (2004/05)	80%
School Travel Plan	14%	83%
Speed Limit Compliance	56% (2004/05)	60%
Abbey Line	375,000 journeys	750,000 journeys

18.3 What are the key objectives and other decision-making criteria that we need to consider?

18.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

- Promote sustainable growth within environmental limits
- Reduce poverty and inequality and promote social inclusion
- Reduce greenhouse gas emissions
- Promote employment, learning, skills and innovation
- Increase resource efficiency and reduce resource use and waste
- Move goods and people sustainably
- Meet the needs of the changing regional demographic.

18.4 What's the situation now? (including any existing problems)

18.4.1 East Herts has largely been bypassed by strategic road and rail corridors. The M11 and the West Anglia Main Line between London and Cambridge is to the east (although including stations within the district at Bishop's Stortford and Sawbridgeworth) and the A1(M) and the East Coast Mainline to the west. The M25 London Orbital Motorway lies further to the south while in terms of aviation Stansted Airport lies just across the boundary in Essex to the east and Luton Airport is further to the west in Bedfordshire. The provision of these key transport facilities outside of the district has helped East Herts to maintain its rural character²⁰⁰.

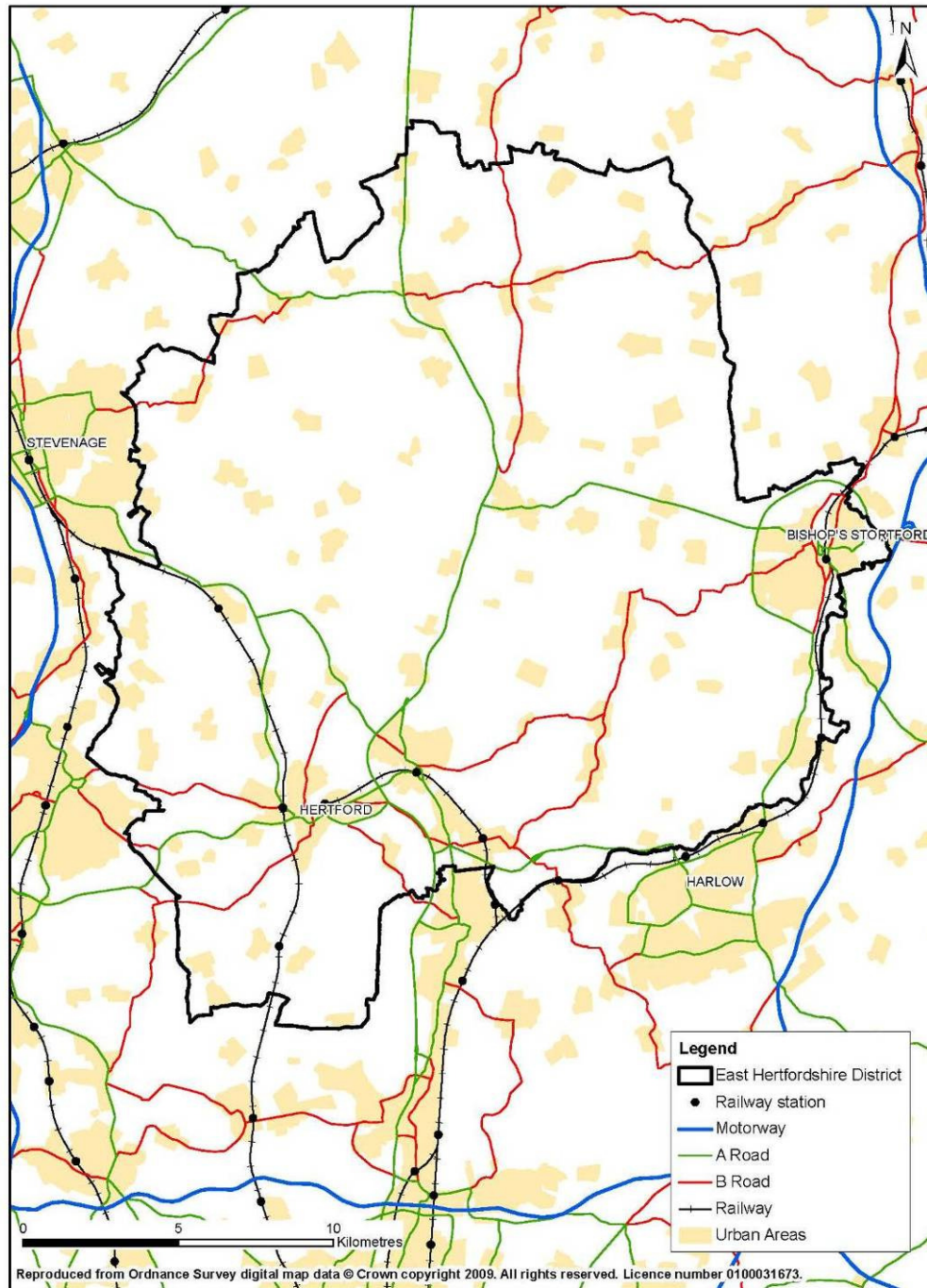
18.4.2 As shown in Figure 34 the main roads within the district include²⁰¹:

- the A10 which bisects the district roughly in half on a north-south axis;
- The A414 to the south of the district which runs in an east-west direction;
- The A120 which runs east-west from the A10 at Stondon/Puckeridge to Bishop's Stortford (and beyond); and
- The A602 linking the A10 from Ware with the A1(M) in Stevenage (outside the district).

²⁰⁰ East Herts District Council (2009). *Draft spatial portrait*.

²⁰¹ Ibid.

Figure 34: Primary transport routes within East Herts



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18.4.3 In addition to main line stations at Bishop's Stortford and Sawbridgeworth, rail services are provided in the district at Bayford, Hertford North, and Watton-at-Stone on the Hertford Loop, and at St Margarets, Ware, and Hertford East on the Hertford East branch line²⁰².

²⁰² East Herts District Council (2009). *Draft spatial portrait*.

- 18.4.4 Bus and coach provision varies throughout the district. Regular bus services are available in some locations and there is a well-used bus station in Hertford, with improved passenger interchange facilities planned in Bishop's Stortford. There is currently unmet demand in other parts of the district and some rural pockets where a lack of transport leads to difficulties in accessing services. This contributes towards transport deprivation²⁰³.
- 18.4.5 The continued growth in road traffic in Hertfordshire poses a serious threat to the quality of life in the county and represents traffic flows which are 35% higher than the national average²⁰⁴. Traffic growth predictions (Figure 35) show that East Herts is forecast to have the highest percentage increase in traffic flows in by 2011 and 2021, significantly higher than County, Region and National averages²⁰⁵.

Figure 35: Traffic growth predictions (2001 base year)

	2011 (% increase)	2021 (% increase)
National (GB)	17%	31%
Eastern Region	18%	34%
Hertfordshire	16%	31%
Broxbourne	14%	26%
Dacorum	11%	21%
East Hertfordshire	30%	57%
Hertsmere	12%	22%
North Hertfordshire	24%	47%
St Albans	13%	24%
Stevenage	17%	32%
Three Rivers	11%	21%
Watford	14%	26%
Welwyn Hatfield	14%	26%

- 18.4.6 Several factors contribute towards high levels of car ownership (1.48 vehicles per household in 2001, compared to a County average of 1.34 and national average of 1.11) including the rural nature of the district, its close proximity to London and high levels of affluence. It is notable that 47% of households in East Herts have two or more vehicles and 66% of the working population travel to work by car. As identified in Paragraph 11.4.2 a significant proportion of the district's CO2 emissions are from the transport sector. However, while many have a high reliance on cars, 13% of households in the district have no access to a car or van at all and largely rely on public transport²⁰⁶.
- 18.4.7 The 2001 Census also reveals that the percentage of people who work from home in East Herts is 10.02%. This is slightly higher than the East of England (9.44%) and England (9.16%)

²⁰³ Ibid.

²⁰⁴ Hertfordshire County Council (2006). *Hertfordshire Local Transport Plan 2006/07 – 2010/11* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/ltp2section1.pdf> (accessed 24 August 2009).

²⁰⁵ Ibid.

²⁰⁶ East Herts District Council (2009). *Draft spatial portrait*.

averages²⁰⁷. Methods of travel to work in East Herts (2001) are shown in Table 12. Key figures from this table include the higher than average proportion in East Herts who commute using the train and drive as well as the significantly lower proportion of workers in the district who commute using the bus, mini bus or coach. This latter statistics reflects the rural nature of the district but also may indicate poor provision of bus services.

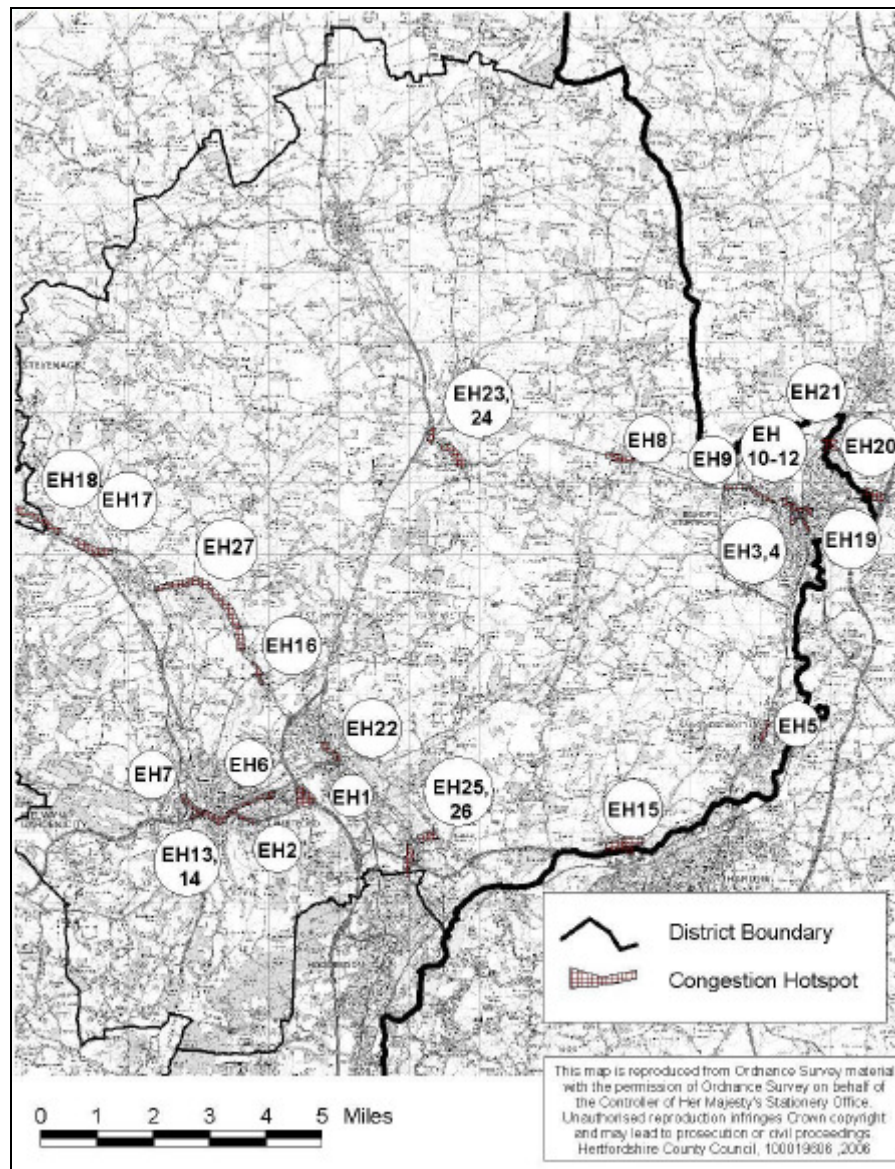
Table 12: Methods of travel to work in East Herts

Method	East Herts %	East of England %	England %
Underground, metro, light rail or tram	0.49	0.84	3.16
Train	9.91	6.05	4.23
Bus, mini bus or coach	1.84	3.99	7.51
Motorcycle, scooter or moped	0.92	1.11	1.11
Driving a car or van	61.37	58.88	54.92
Passenger in a car or van	4.59	5.84	6.11
Taxi or minicab	0.46	0.45	0.52
Bicycle	1.53	3.88	2.83
On foot	8.58	9.06	9.99
Other	0.30	0.46	0.46

- 18.4.8 Nevertheless, the high levels of car ownership help contribute towards a number of congestion hotspots identified within the district. These are shown in Figure 36 and predictably they are found in and around the district's main settlements. In particular, there are numerous congestion hotspots identified within and around Bishops Stortford and Hertford.

²⁰⁷ Office for National Statistics (2001). *Travel to work* [online] available at: <http://neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=276992&c=east+hertfordshire&d=13&e=46&g=454189&i=1001x1003x1004&m=0&r=1&s=1250243478298&enc=1&dsFamilyId=283> (accessed 14 August 2009).

Figure 36: Reported congestion hotspots in East Herts²⁰⁸

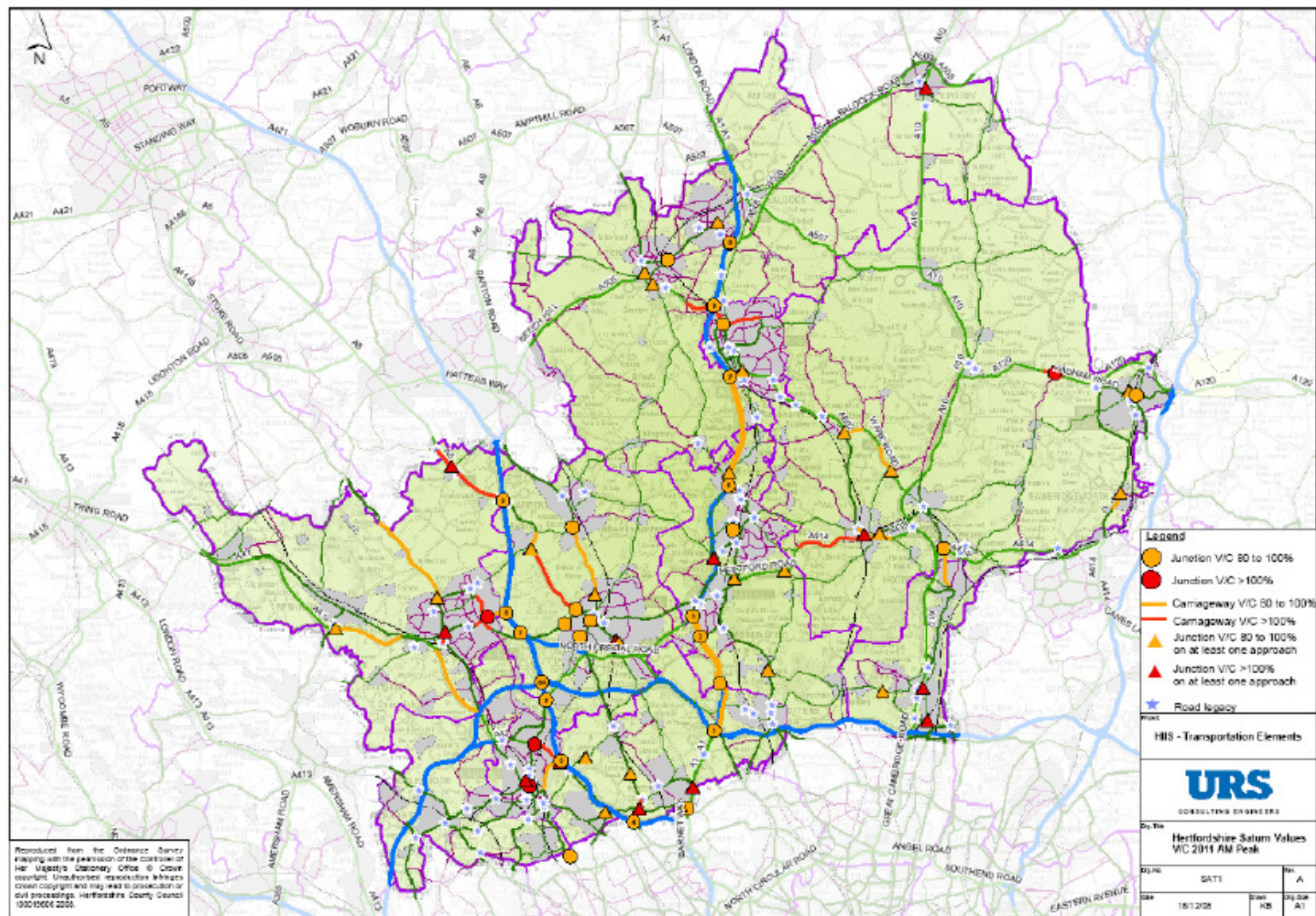


18.4.9 The map of Hertfordshire shown in Figure 37 identifies those roads either approaching capacity at 80-100% (Amber) or exceeding capacity 100%+ (Red). Within East Herts the map shows that there are several junctions exceeding capacity at Hertford and west of Bishop's Stortford. In addition, the only large extent of carriageway currently exceeding capacity is the A414 west of Hertford²⁰⁹.

²⁰⁸ Hertfordshire County Council (no date). *Appendix 1: Congestion hotspots map* [online] available at: <http://www.hertsdirect.org/infobase/docs/pdfstore/EHhotspots.pdf> (accessed 7 August 2009).

²⁰⁹ Hertfordshire County Council (2008). *Hertfordshire Infrastructure Investment Strategy: stage 2 transport technical report – post 2011 [draft]*.

Figure 37: AM Peak Volume over Capacity (V/C) Ratio Bands Above 80% at 2011



- 18.4.10 In terms of accessibility, Table 13 shows the accessibility to six key services from new residential development. This reveals that 99% of new dwellings have been completed with 30 minutes public transport time of five of the six key services. However, reflecting the fact that there are only two hospitals within the District (Hertford County in Hertford and Herts and Essex in Bishop's Stortford) only 94% of dwellings are within 30 minutes public transport time of a hospital²¹⁰.

Table 13: Accessibility to key services

Type of Facility	Amount of new residential development within 30 minutes public transport time
GP	100%
Hospital	94%
Primary school	100%
Secondary school	99%
Area of employment	100%
Major retail centre	99%

- 18.4.11 Cycling provision varies throughout the district. The National Cycle Network route 61 is a well used shared-surface facility and runs on an easterly axis through the district as far as Ware²¹¹. While many areas are underprovided for, there are several other cycle routes that are either fully contained within East Herts or pass through the district. These include:

- The River Lee Country park cycle route
- The Alban Way; and
- Roisia's Path.

Are there any evidence gaps?

- 18.4.12 More up to date information regarding commuting patterns is required to identify significant trends within the district.

18.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 18.5.1 Without intervention through the Core Strategy the district is likely to continue to experience increasing levels of traffic congestion, particularly given the high levels of housing provision that have been planned for the district and nearby. The local authority is constrained in the overall

²¹⁰ East Herts District Council (2009). *Annual Monitoring Report* [online] available at: http://80.168.51.108/media/pdf/b/o/AMR_07-08.pdf (accessed 5 August 2009).

²¹¹ East Herts District Council (2009). *Draft spatial portrait*.

effect that it may have on traffic within the district however, without the plan it is anticipated that the impacts of development and overall levels of growth would be greater than if the intervention did not occur. This is because the plan provides an up-to-date response to current issues as evidenced by recent studies and current best practice.

18.6 What issues should be a particular focus for the appraisal?

18.6.1 In light of the information above, key issues to take into account in the appraisal in relation to transport include:

- The need to ensure that a more sustainable modal shift is facilitated and that levels of private car use are reduced
- The need to ensure that new development does not contribute towards increased levels of traffic congestion
- The need to ensure that rural accessibility to bus services does not deteriorate and is improved.

19 Water

19.1 Introduction

- 19.1.1 Water quality is assessed by the percentage of river length that has good chemical and ecological status. Ecological status, in turn, is defined as a combination of physico-chemical elements (e.g. nutrients, pH, dissolved oxygen), biological elements (e.g. fish, algae), specific pollutants and hydromorphology (e.g. depth, width, flow).
- 19.1.2 Poor water quality is typically due to a combination of agricultural runoff, untreated drainage from built-up areas and roads, and discharge from wastewater treatment works. It can affect people's health, and that of plants and animals.
- 19.1.3 The pressures on our water resources are growing. More houses are being built, our population is increasing and we are all using more water. Climate change will only add to these pressures. In England and Wales, roughly 48% of the water abstracted is for household use, 22% for non-domestic use, and 22% is lost due to leakage²¹².
- 19.1.4 East Herts experience significant fluvial and surface water flood risk. The East Herts Strategic Flood Risk Assessment and the Environment Agency's Areas at Risk of Surface Water Flooding maps provide further information²¹³. For further information on flooding see Chapter 11 – Climate Change.

19.2 What's the policy context?

- 19.2.1 The EU Water Framework Directive (WFD)²¹⁴ requires all inland and coastal waters to achieve at least 'good status' by 2015 or, where this is not possible, by 2021 or 2027. The Environment Agency has prepared River Basin Management Plans²¹⁵ that show how these requirements will be met by 2025. This includes a plan for the Thames River Basin District which covers East Herts. Ongoing actions with relevance to LPAs include influencing the location of development, developing specific policies for contaminated land, and to comply with published advice (SUDS Code of Practice) for operators on sustainable drainage systems (SUDS) (this is voluntary or optional but driven by the Groundwater Directive). In addition, a number of actions may be taken by the Environment Agency post 2015 and therefore should be considered by the Plan to ensure that it is flexible enough. These actions relevant to LPAs include²¹⁶:

- Influencing local government policies to ensure building regulations adopt high standards of water efficiency;
- Seeking inclusion of water efficiency measures and targets with Regional Spatial Strategies and Local Development Framework documents;

²¹² Environment Agency (2007) *Water supply in England and Wales 2000 to 2007* [online] available at: http://publications.environment-agency.gov.uk/pdf/GEHO0907BMXP-e-e.pdf?lang=_e (accessed 29 June 2009).

²¹³ Defra (2010). *Improving surface water drainage* [online] available at: <http://www.defra.gov.uk/environment/flooding/manage/surfacewater/index.htm> (accessed 16 March 2010).

²¹⁴ European Union (2000) *EU Water Framework Directive* [online] available at: http://ec.europa.eu/environment/water/water-framework/index_en.html (accessed 29 June 2009).

²¹⁵ Environment Agency (2009) *River Basin Management Plans* [online] available at: <http://www.environment-agency.gov.uk/research/planning/33106.aspx> (accessed 29 June 2009).

²¹⁶ Environment Agency (2009). *Water for life and livelihoods: annex C – actions to deliver objectives*.

- Ensure the need for appropriate Water Cycle Strategies are included in regional and local plans, particularly in growth or high risk areas;
- Influence developers and LPA on implications of WFD during preparation of development briefs for major developments;
- Provide national guidance for spatial planners on integrating development planning and water planning;
- RSSs to include policy ensuring the delivery of WFD requirements through planning/LDF process
- Influence the LPA on enforcement of National, Regional and Local Planning Policy relating to pollution prevention, SUDS, land and groundwater contamination and ecological enhancement. Strengthen policy through regular review; and
- Identify suitable development for high risk areas in this groundwater sensitive area with thin soils over Chalk and fairly rapid fissure flow.

19.2.2 Future Water: The Government's water strategy for England (2008)²¹⁷ sets out the Government's vision for how the water sector will look by 2030 and some of the steps necessary to achieve it. The Strategy requires planning authorities to work closely with the water companies and the Environment Agency on timing and numbers of new households in areas likely to see the greatest growth. The CLG/Defra's report 'Water efficiency in new buildings'²¹⁸ outlines policies and measures that aim to reduce domestic consumption in new properties to 125 litres per head per day (l/hd/d) through the introduction of new building regulations. Government has also consulted on amending the Building Regulations to include minimum water efficiency standards for new homes²¹⁹, and will review the Water Supply (Water Fittings) Regulations 1999 later in 2009. However there is uncertainty about when these will be agreed, and associated implementation put in place.

19.2.3 The Code for Sustainable Homes²²⁰ outlines various target levels for the construction of sustainable homes, one aspect of which is the efficient use of water. From 2010, all affordable housing will have to be constructed to Code Level 3, which sets water consumption at 105 l/p/d for internal use for an average year.

19.2.4 The Environment Agency is developing Catchment Abstraction Management Strategies (CAMS)²²¹ which consider how much water can be abstracted from watercourses without damaging the environment within a catchment – the most appropriate scale for planning for water. They recognise the needs of abstractors whilst also fitting in with the requirements of the Water Framework Directive. The Environment Agency is also carrying out research into environmental limits and how they relate to infrastructure provision. East Herts is within the area of the Thames region CAMS. The Environment Agency's view on water metering is that the

²¹⁷ Defra (2008). *Future Water: The Government's water strategy for England* [online] available at: <http://www.defra.gov.uk/environment/water/strategy/pdf/future-water.pdf> (accessed 22 July 2009).

²¹⁸ CLG / Defra (2007) *Water efficiency in new buildings* [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/WaterEfficiencyNewBuildings.pdf> (accessed 29 June 2009).

²¹⁹ CLG (2008) *The Building Act 1984, The Building Regulations 2000. Proposals for amending Part G (Hygiene) of the Building Regulations and Approved Document G: Consultation* [online] available at:

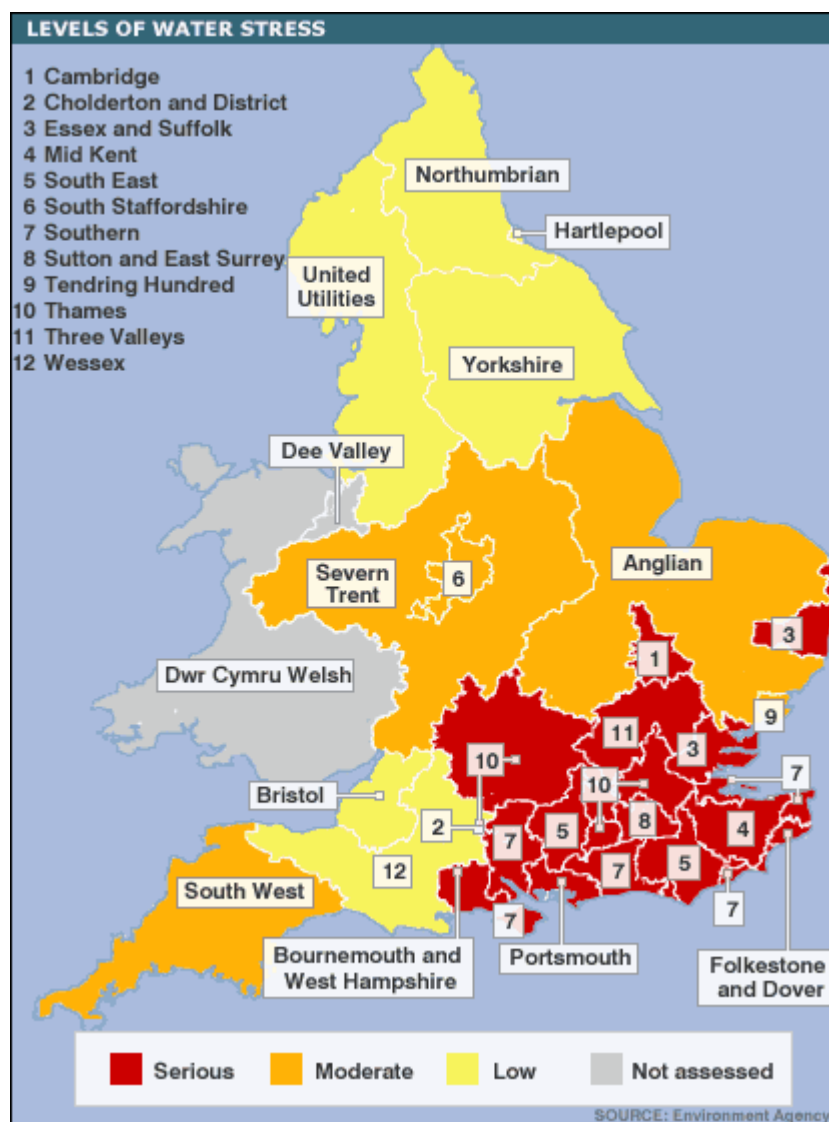
<http://www.communities.gov.uk/publications/planningandbuilding/partgconsultation> (accessed 29 June 2009).

²²⁰ CLG (2006) *Code for Sustainable Homes: a step-change in sustainable home building practice* [online] available at: http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf (accessed 29 June 2009).

²²¹ For more information on catchment abstraction management strategies see: <http://www.environment-agency.gov.uk/research/planning/33372.aspx> (accessed 29 June 2009).

majority of homes in water stressed areas should be metered by 2015. East Herts is currently considered to be under serious water stress as shown in Figure 38.

Figure 38: Areas of water stress²²²



- 19.2.5 The East of England Plan contains several specific policies to manage water resources within the Region. These include Policy **WAT1: Water Efficiency** which aims to reduce per capita consumption rates and advocates a 'twin track' approach to meeting the increasing demand for water in the region. In this demand management and resource development plans are both progressed and supported by additional policies. Policy **WAT2: Water Infrastructure** advises that LDDs should plan to site new development so as to maximise the potential of existing water/waste water treatment infrastructure and minimise the need for new / improved infrastructure. Supportive text for this policy states that a particular challenge for certain parts of the region will be to reconcile growth ambitions with environmental limits. This is the case for the

²²² BBC News (2007). *Water metering plans put forward* [online] available at: <http://news.bbc.co.uk/1/hi/england/6314091.stm> (accessed 14 August 2009).

Rye Meads STW catchment area which includes parts of East Herts as well as Stevenage, Harlow and Welwyn Garden City. Here a strategic review of the options is required which look beyond incremental expansion to new facilities or other possible works to cope with restrictions at Rye Meads. Policy **WAT3: Integrated Water Management** states that LPAs should work with partners to ensure their plans, policies, programmes and proposals take account of relevant water-related plans, studies, and sites of European importance for wildlife.

19.2.6 The Rye Meads Water Cycle Strategy (WCS)²²³ has studied water resources, drinking water supply, wastewater networks and treatment, flood risk, water quality and environmental opportunities within the Rye Meads catchment. It also sets out recommendations regarding housing growth and water infrastructure to 2021 and beyond. The WCS found that there are no overwhelming technical constraints to the planned growth (to deliver the RSS targets to 2021) in the Rye Meads catchment. However, the scale, cost, and time to deliver the required sewage infrastructure, especially to serve the planned development at Stevenage, should not be underestimated. Whilst this does not prevent growth being achievable, it could be a real constraint, as it impacts on the number of new dwellings that could be delivered by 2021 and beyond. Other findings include:

- **Water supply – resources:** optimisation of existing resources coupled with an extensive demand management scheme, involving accelerated penetration of customer water meters, will prevent a supply / demand deficit in the study area prior to 2035. The importance of adopting the Code for Sustainable Homes (CSH) water efficiency targets in new dwellings of 105 l/p/d (as a minimum) and aiming for Defra's aspirational target of 130 l/p/d by 2030 in existing dwellings has been highlighted.
- **Sewerage network:** this is known to be close to capacity in certain areas of the Rye Meads Wastewater Treatment Works (WwTW) catchment. This increases the risk of flooding from sewers, particularly during storm events. The Thames Water Utilities (TWU) sewerage network can be upgraded (pending funding) to create the capacity for all the additional development at and around Stevenage and Harlow and the remaining development expected within the Rye Meads catchment past 2021, although the overall sustainability of this cannot be assessed until a long-term treatment solution is finalised.
- **Wastewater treatment:** Rye Meads WwTW should be able to operate within its existing volumetric discharge consent limit past 2021 with appropriate upgrades as needed.
- **Water quality:** There is a risk that water quality and wastewater treatment will constrain development in the long term beyond 2021. The WCS has recommended that further studies are completed.
- **Flood risk:** There appears to be sufficient land available for East Herts to steer development away from areas of flood risk although Surface Water Management Plans (SWMPs) are recommended for East Herts and developers must incorporate sustainable drainage systems (SUDS).

19.2.7 Two studies of relevance to water which may also be drawn upon to support the appraisal include:

²²³ Stevenage Borough Council (2009). *Rye Meads Water Cycle Strategy* [online] available at: http://80.168.51.108/media/pdf/a/0/Rye_Meads_Water_Cycle_Strategy.pdf (accessed 20 October 2009).

- Impacts of growth on Water Quality in the East of England: Interim Report to support the RSS Review (2009); and
- The Impact of Housing and Water Efficiency Policies on Water Supplies to the East of England – Evidence for the Review of the East of England Plan (2009)

19.3 What are the key objectives and other decision-making criteria that we need to consider?

19.3.1 Key objectives from the East of England Integrated Regional Sustainability Framework include:

- Promote sustainable growth within environmental limits
- Adapt to the impacts of climate change
- Increase resource efficiency and reduce resource use and waste
- Conserve, restore and enhance the region's natural and built environment.

19.4 What's the situation now? (including any existing problems)

19.4.1 The principal rivers within East Herts are the Lee, Mimram, Rib, Ash, Stort and Beane. These run across the district with the higher ground lying in between largely comprised of alkaline or neutral soil. The main watercourses in the district are shown in Figure 39.

Map 2

Watercourses

Level 1 Strategic Flood Risk Assessment (November 2011)
Scale: 1:50,000
Source: Environment Agency
and East Herts Council

East Herts Council
Watfields
Pepps Lane
Hemel Hempstead
SG13 8EQ
Tel: 01279 655261

- 19.4.2 East Herts forms part of the Upper Lee catchment. Water quality within the catchment varies, although most of the catchment is classed as being good or very good by the Environment Agency²²⁴.
- 19.4.3 The EA general classification for the area is a major aquifer, specifically the area around Hertford and Ware which is the district's major area of industrial activity. Other parts of Hertfordshire are classed as non-aquifer. Major aquifers are very sensitive to potential pollution and in East Herts the vulnerable major aquifers occur where chalk outcrops appear at surface level, which is the case north of Bishops Stortford. There are source protection zones in the north of the district²²⁵.
- 19.4.4 There are approximately 117 private water supplies within the district which serve roughly 200 properties. These are served from their own borehole or well supply²²⁶.
- 19.4.5 Water resources - in terms of supply, sewerage, and flood risk - are an increasingly important issue for the district as a whole. The River Lee and Stort basins in particular are an area of extreme water stress which is exacerbated by low rainfall and high levels of water consumption²²⁷ (however, the Beane and the Mimram are more stressed rivers²²⁸). Figure 40 shows that East Herts has been identified as both over-abstracted (meaning existing abstraction is causing unacceptable damage to the environment at periods of low flows) and over-licensed (meaning that no water is available at times of low flow)²²⁹.

²²⁴ East Herts District Council (no date). *The East Hertfordshire Environment* [online] available at: <http://www.eastherts.gov.uk/index.jsp?articleid=1884> (accessed 14 August 2009).

²²⁵ Ibid.

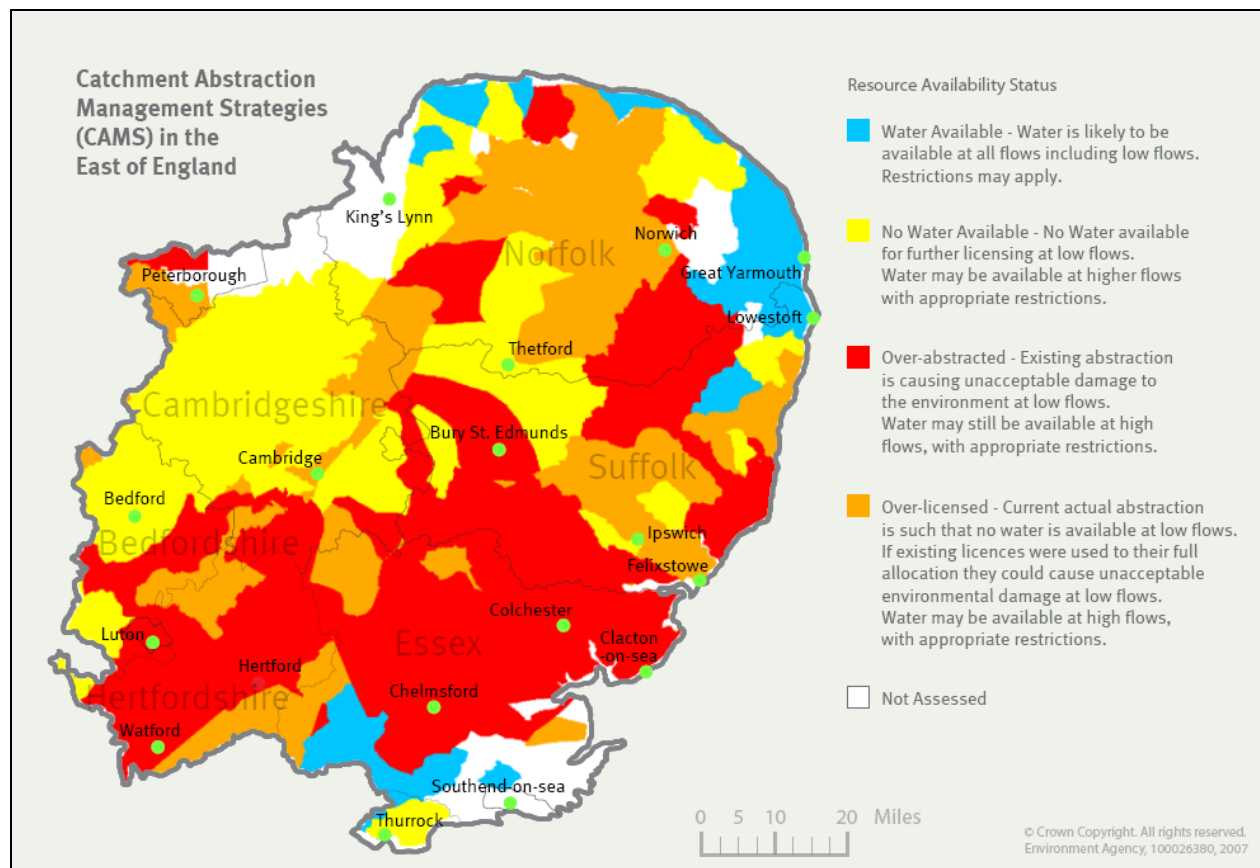
²²⁶ Ibid.

²²⁷ East Herts District Council (2009). *Draft spatial profile*.

²²⁸ Consultation response

²²⁹ Environment Agency (2009). *State of the environment – East of England* [online] available at: <http://www.environment-agency.gov.uk/research/library/publications/34059.aspx> (accessed 14 August 2009).

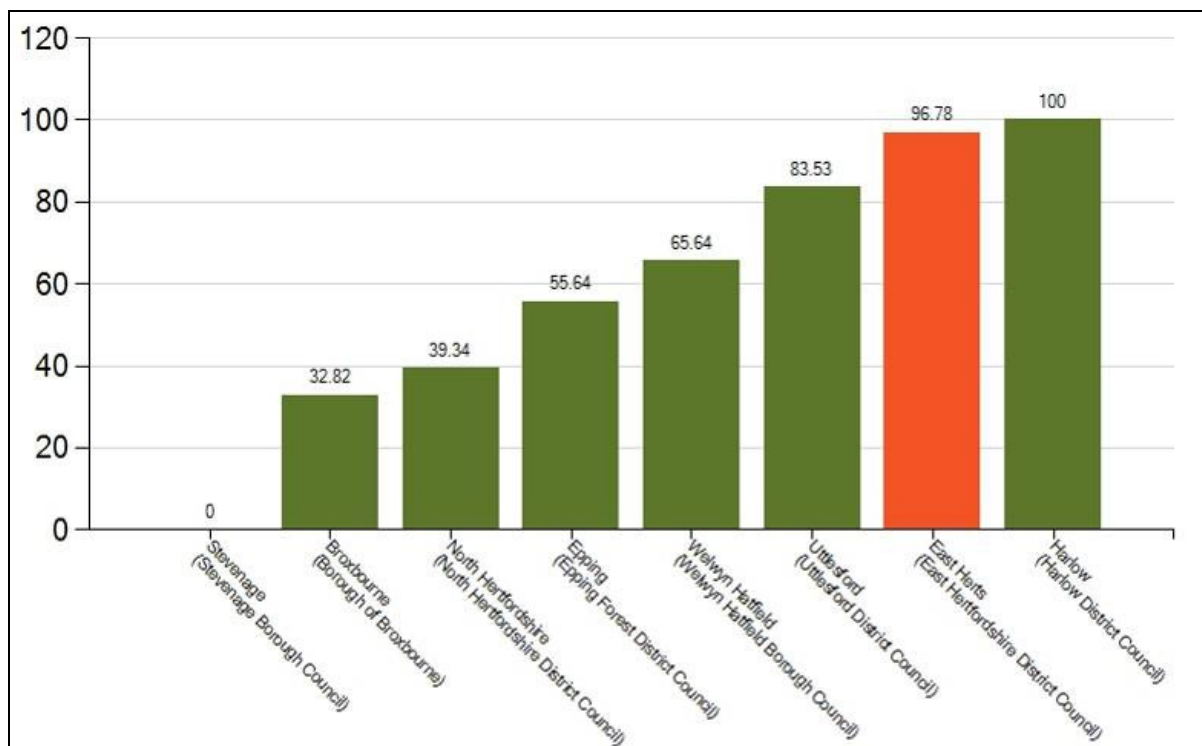
Figure 40: Water abstraction in the East of England



- 19.4.6 Within East Herts the daily domestic water use (per capita consumption, litres) was 181 litres in 2004. This is significantly higher than the national average of 154 litres for that year²³⁰.
- 19.4.7 The percentage of river length assessed as good biological quality was 96.78% in 2005. This represents an approximate 3.5% increase since 2000 and it is higher than most of its geographical neighbours as shown in Figure 41.

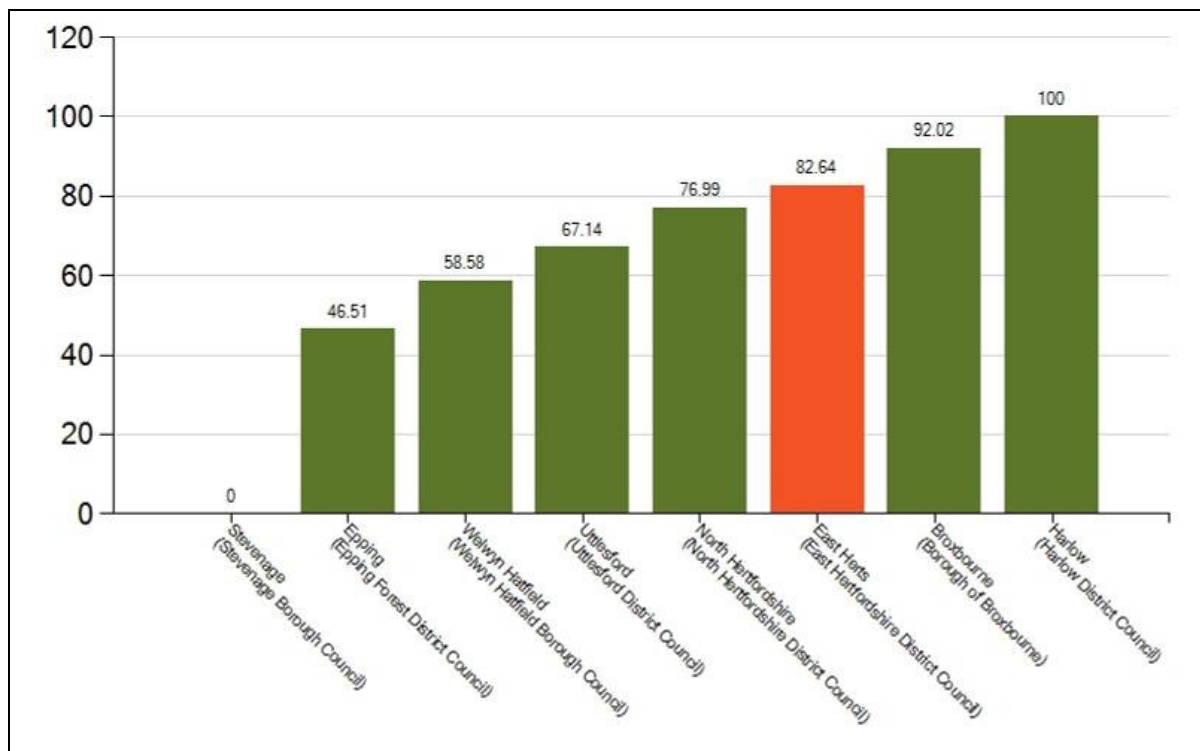
²³⁰ Audit Commission (2009). *Area profile – East Herts* [online] available at: [http://www.areaprofiles.audit-commission.gov.uk/\(q1xdaxqbh2qpb5u0yfu1qe45\)/DataProfile.aspx?entity=0](http://www.areaprofiles.audit-commission.gov.uk/(q1xdaxqbh2qpb5u0yfu1qe45)/DataProfile.aspx?entity=0) (accessed 14 August 2009).

Figure 41: % of river length assessed as good biological quality



- 19.4.8 The percentage of river length assessed as good chemical quality in East Herts was 82.64% in 2005. This is a decrease of approximately 9% since 2000, however, the dataset does exhibit signs of significant year-on-year variability (e.g. the percentage in 2003 was 76.09%, bookended by 98% in 2002 and 95.6% in 2004). This figure compares reasonably well with its geographic neighbours as shown in Figure 42.

Figure 42: % of river length assessed as good chemical quality



19.4.9 Under the EU WFD water quality assessments are now being published using a new, tougher methodology which reports on over 30 measures, grouped into ecological status and chemical status. The changes to the assessments mean that WFD results appear significantly different to the above GQA data. In 2011 the EA will follow the WFD classification only. Within East Herts only the River Lee and Lee Navigation fail WFD targets for chemical quality²³¹. The following waterways currently have 'poor' ecological quality²³²:

- Stort Navigation
- Rib
- Quin
- Stort (at Clavering)

Are there any evidence gaps?

19.4.10 There are no apparent evidence gaps.

²³¹ Environment Agency (2009). *Water Framework Directive – River Basin Management Plans – Rivers* [online] available at: <http://maps.environment-agency.gov.uk> (accessed 24 February 2010).

²³² Ibid.

19.5 What will be the situation without the plan? (the 'business-as-usual' option)

- 19.5.1 Without the plan key ambitions within RSS policies may not be achieved including locating new development so as to maximise the potential for existing water/waste water treatment infrastructure. Additionally, without intervention many of the government targets with respect to water efficiency may not be realised. This is an issue of serious concern given the problem of water stress and the high levels of growth to be provided within and around East Herts. Combined with the predicted effects of climate change, water quality and quantity would be likely to be adversely affected by new development, particularly in the absence of a plan that sets out the appropriate distribution and phasing of development to take into account infrastructure and environmental constraints.
- 19.5.2 Without the plan process there would not be the opportunity for the strategic interventions by the Environment Agency as described in Para 19.2.1 to ensure that the requirements of the Water Framework Directive are met.

19.6 What issues should be a particular focus for the appraisal?

- 19.6.1 In light of the information above, key issues to take into account in the appraisal in relation to water include:
- East Herts is located in an area experiencing water scarcity which is predicted to be exacerbated due to climate change and future growth and development
 - The need to ensure the distribution and location of development takes the water supply and sewerage infrastructure into account
 - The need to reduce per capita consumption of water.

20 European sites

20.1 Introduction

European Court of Justice ruling

- 20.1.1 It is a requirement of 6 of the EC Habitats Directive 1992 and Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended) (**Box 4**) that 'land use plans' (including local authority Local Development Frameworks) are subject to an 'Appropriate Assessment' (AA) if it is likely that they will lead to significant adverse effects on a Natura 2000 site (Special Areas of Conservation, SACs, and Special Protection Areas, SPAs). As a matter of UK Government policy Ramsar sites²³³, candidate Special Areas of Conservation (cSAC) and proposed Special Protection Areas (pSPA) are given equivalent status.

Box 4: The legislative basis for Appropriate Assessment

Habitats Directive 1992

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."

Article 6 (3)

Conservation (Natural Habitats &c. Regulations) 1994 (as amended)

"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives ... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".

Regulation 48

- 20.1.2 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This is in contrast to the Strategic Environmental Assessment (SEA) Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; it simply says that the assessment findings (as documented in the 'environmental report') should be 'taken into account' during preparation of the plan or programme. In the case of the Habitats Directive, potentially damaging plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network.
- 20.1.3 As assessment of plans has developed, the term Habitats Regulations Assessment (HRA) has come into currency for describing the overall assessment process (including screening to determine whether significant adverse effects are likely or not) and this term is used below when necessary to distinguish the process from the 'Appropriate Assessment' stage itself.

²³³ Wetlands of International Importance designated under the Ramsar Convention 1979

20.2 This report

20.2.1 This report is intended to serve three main purposes, all of which seek to define the processes and parameters of the HRA:

- To set out the methodological approach to undertaking the HRA of the Core Strategy DPD;
- To provide details of data sources that have been identified at this initial stage as being available to inform the HRA (the 'evidence base'); and
- To set out the 'scope' of the HRA (subject to agreement with Natural England) - The scope of the HRA will consist of three components:
 - **The physical scope** – the range of European sites that will be considered within the assessment.
 - **The policy scope** – the aspects of the Core Strategy that will need to be subject to HRA.
 - **The 'in combination' scope** – the range of other plans and projects that need to be considered 'in combination' with the Core Strategy. In practice, 'in combination assessment' is of greatest importance when the Core Strategy would otherwise be dismissed because the individual contribution is inconsequential.

20.2.2 This report is particularly intended to stimulate discussion over the scope and we would be very interested in the comments of Natural England concerning the data sources identified and the 'other plans and projects' to be considered in combination with the Core Strategy DPD.

20.3 Methodology

Principles

20.3.1 Scott Wilson has adhered to several key principles in developing the methodology – see Table 14.

Table 14: Key principles underpinning the methodology

Principle	Rationale
Use existing information	We will use existing information to inform the assessment. This will include information gathered as part of the SA of the emerging Local Development Framework and information held by Natural England, the Environment Agency and others.
Consult with Natural England, the Environment Agency and other stakeholders	We will ensure continued consultation with Natural England and the Environment Agency for the duration of the assessment. We will ensure that we utilise information held by them and others and take on board their comments on the assessment process and findings.
Ensure a proportionate assessment	We will ensure that the level of detail addressed in the assessment reflects the level of detail in the Core Strategy (i.e. that the assessment is proportionate). With this in mind, the assessment will focus on information and impacts considered appropriate to the local level.
Keep the process simple as possible	We will endeavour to keep the process as simple as possible while ensuring an objective and rigorous assessment in compliance with the Habitats Directive and emerging best practice.
Ensure a clear audit trail	We will ensure that the AA process and findings are clearly documented in order to ensure a clearly discernible audit trail.
Agree presentational format	We will agree the style of presentation early in the process, considering the audience for the work.
Flexibility	We will maintain a watching brief on all changes to HRA guidance from CLG and Natural England as well as advances in HRA best practice, in order to ensure that we provide the client with the best advice possible.

20.4 Appropriate Assessment

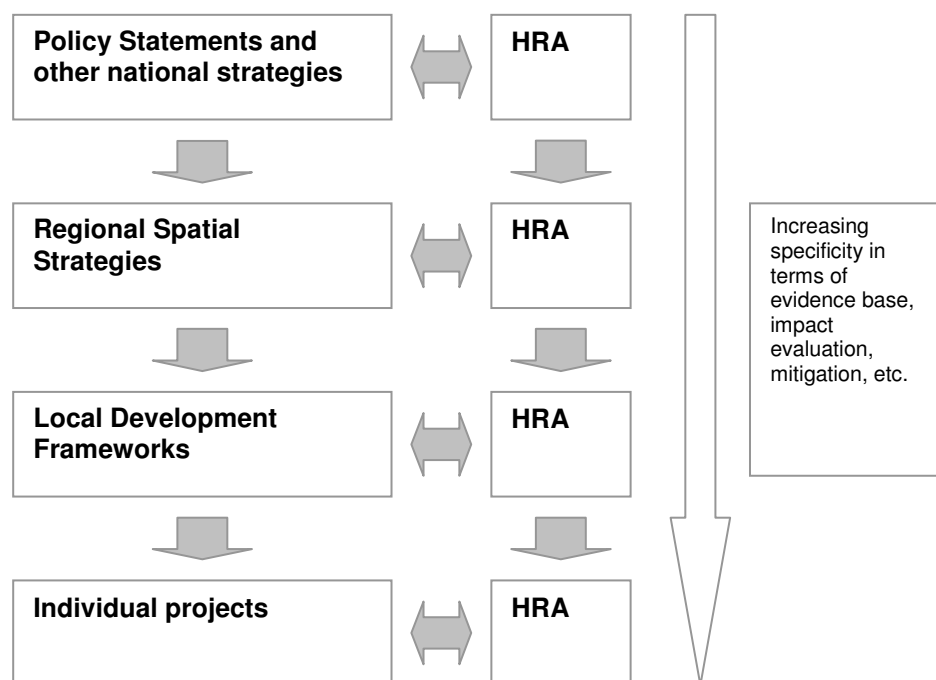
- 20.4.1 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of adverse effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 20.4.2 However, the draft Communities and Local Government (CLG) guidance²³⁴ makes it clear that when implementing HRA of land-use plans, the AA should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 20.4.3 *“The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land*

²³⁴ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.”

- 20.4.4 In other words, there is a tacit acceptance that appropriate assessment can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers (Figure 43).
- 20.4.5 For an LDF the level of detail concerning the developments that will be delivered is usually insufficient to make a highly detailed assessment of significance of effects. For example, precise and full determination of the impacts and significant effects of a new settlement will require extensive details concerning the design of the town, including layout of greenspace and type of development to be delivered in particular locations, yet these data will not be decided until subsequent stages.
- 20.4.6 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt; it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon a European site unless it can be clearly established otherwise.

Figure 43: Tiering in HRA of Land Use Plans



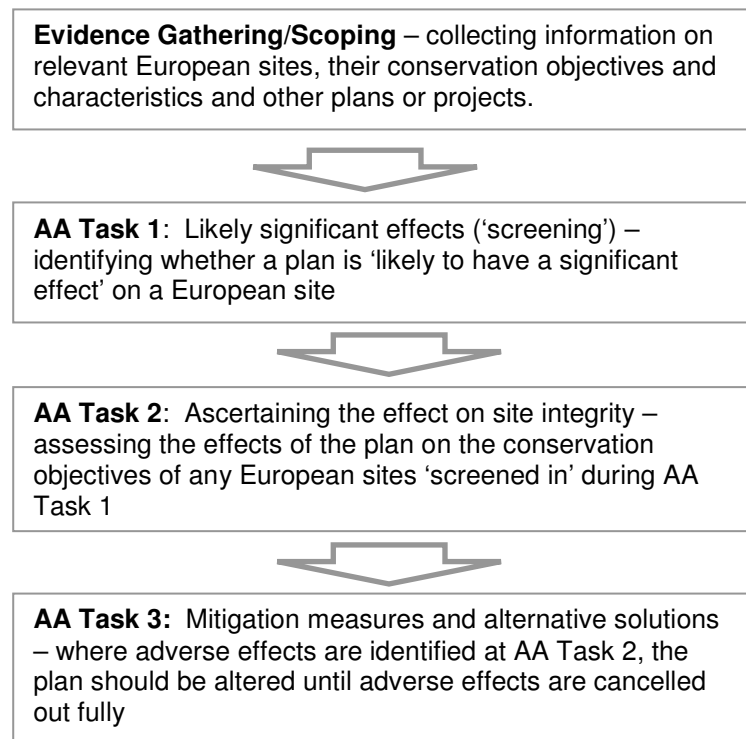
20.5 The Process of HRA

- 20.5.1 The HRA is likely to be carried out in the continuing absence of formal Government guidance. CLG released a consultation paper on AA of Plans in 2006²³⁵. As yet, no further formal guidance has emerged.

²³⁵ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

- 20.5.2 Figure 44 outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

Figure 44: Four-stage approach to Habitats Regulation Assessment



- 20.5.3 In practice, we and other practitioners have discovered that this broad outline requires some amendment in order to feed into a developing land use plan such as a Core Strategy.
- 20.5.4 The Evidence Gathering stage is the purpose of the remainder of this document.

20.6 The Scope of the HRA

- 20.6.1 The scope of the HRA has been divided for simplicity into three components. The purpose of this section is to define that scope as far as possible at this stage. We would be interested to receive Natural England's view on the various issues of scope that we raise below.

20.7 The physical scope

- 20.7.1 This defines the range of European sites that will be considered within the assessment. The following are typical of the issues that have to be considered during Appropriate Assessment of spatial development policies.

Table 15: Possible impacts of LDFs in East Hertfordshire upon European sites

Impact	Comment
Landtake	<p>May cause fragmentation as well as habitat loss.</p> <p>Land outside European site boundaries may be important for the integrity of the site (e.g. areas outside SPAs that are used by roosting or feeding birds) e.g. around the Lee Valley</p>
Hydrology	<p>Demand for water could result in drawdown of water levels within the Lee Valley.</p> <p>Development may have hydrological consequences, affecting surface water and/or groundwater flows upon which wetland sites are dependent.</p>
Water quality	<p>Sewage treatment effluent (e.g. pressure on capacity at Rye Meads STW)</p> <p>Effluent from industrial processes.</p> <p>Polluted run-off from car parking areas and roads.</p>
Air quality	<p>Industrial emissions.</p> <p>Domestic heating.</p> <p>Traffic</p>
Recreational pressure	<p>Disturbance to sensitive species.</p> <p>Trampling and erosion of sensitive habitats e.g. dunes</p> <p>Eutrophication from dogs.</p>
Other 'proximity effects' of urbanisation	<p>Introduction of invasive alien species, mainly from tipping of garden waste.</p> <p>Increased risk of arson.</p> <p>Effects on behaviour from lighting.</p> <p>Noise disturbance.</p> <p>Cat predation</p>

20.7.2 From our knowledge of the East Hertfordshire area and the impact pathways identified above, it is our view that the physical scope of the HRA (at least at Screening) would be as follows:

Table 16: Physical scope of the HRA

European site	Conceivable pathways identified at this initial stage that may connect European sites to East Hertfordshire
Epping Forest SAC	<p>Increased population levels could lead to possible recreational pressure causing damage to sensitive habitats.</p> <p>Increased population levels in East Hertfordshire could lead to increased traffic levels on the M25 and thus reduced air quality at Epping Forest SAC.</p>
Lee Valley SPA and Ramsar site	<p>Increased population levels could lead to possible recreational pressure causing disturbance of bird interest.</p> <p>Possible water quality issues through pressure on STW capacity and through run-off.</p> <p>Possible hydrological issues through increased demand for water.</p>
Wormley-Hoddesdonpark Woods SAC	<p>Increased population levels could lead to possible recreational pressure causing damage to nature conservation interest.</p> <p>Possible risk from effects normally associated with urbanisation – i.e. fly-tipping.</p>

20.7.3 We have also given thought to including the following European sites but are currently minded to scope them out of consideration:

- **Everden and Wimpole Woods SAC** - While we have considered this site at the scoping stage for completeness our view is that it is unlikely that development within East Hertfordshire will contribute significantly to visitor pressure, since although public access is possible, the woodlands are 15km north of the district and are not easily accessible from major roads from East Hertfordshire. The qualifying feature, barbastelle bats is unlikely to be impacted by low levels of increased visitor numbers.

20.7.4 Further details regarding the features of interest and vulnerabilities of the European sites included within the scope of the HRA are given below.

Epping Forest SAC

20.7.5 Epping Forest SAC is located approximately 10km south-east of East Hertfordshire district. 70% of the 1,600 hectare site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain. Epping Forest supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

Reasons for Designation

20.7.6 Epping Forest qualifies as a SAC for both habitats and species. Firstly, the site contains the Habitats Directive Annex I habitats of:

- Beech forests on acid soils: an example of such habitat toward the north-east of its UK range, containing a notable selection of bryophytes, fungi and dead-wood invertebrates;
- Wet heathland with cross-leaved heath; and
- Dry heath

20.7.7 Secondly, the site contains the Habitats Directive Annex II species Stagbeetle *Lucanus cervus*, with widespread and frequent records.

Historic Trends and Current Pressures

20.7.8 Much of the value of Epping Forest stems from a long history of pollarding, and although this ceased at the end of the 19th century, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995. This helped to reverse the decline of the forest's epiphytic bryophyte population. The slow recovery can also be attributed to the reduction of atmospheric pollutants since the passing of the 1956 Clean Air Act.

20.7.9 There is an active policy to leave felled timber on the ground to increase the habitat for stag beetle and other saproxylic insects. This is one of four outstanding localities for the beetle in the UK, and it is reliant on felled timber for development of its larvae, a process that takes several years.

20.7.10 In 1988, the Corporation of London, who own and manage the forest, agreed a management strategy with English Nature (now Natural England) to take forward the management. A comprehensive management plan was completed and consented in 1998. The site is subject to the provisions of the Epping Forest Act of 1878.

20.7.11 Deteriorating air quality and under-grazing are the two key pressures that currently affect the site.

Table 17: Exceedences for Epping Forest SAC²³⁷.

Pollutant	Units	Grid reference	Sensitive habitat	Critical level/load	Actual level/load	Exceedance?
NO _x	ugm ⁻³ annual mean	TQ425985	Beech woodland	30	(35.6)	(Yes)
NH ₃	ugm ⁻³ annual mean	TQ425985	Beech woodland (epiphytic lichens)	1	(1.7)	(Yes)
SO ₂	ugm ⁻³ annual mean	TQ425985	Beech woodland (epiphytic)	10	(5.9)	(No)

²³⁷ Consultation response. Figures in brackets were taken from APIS some time ago and may not be out of date.

²⁴⁰ All bird count data in this document is sourced from the SPA Review site accounts as available on the Joint Nature Conservation Committee website www.jncc.gov.uk/page-1412

			lichens)			
O ₃	Ppb hrs (AOT40)	TQ425985	Beech woodland	5,000	(7,411)	(Yes)
N deposition	KG N ha ⁻¹ yr ⁻¹	TQ425985	Beech woodland	10	36.4	Yes
N deposition	KG N ha ⁻¹ yr ⁻¹	TQ422992	Heathland	10	(40)	(Yes)
Acid deposition	Keq ha ⁻¹ yr ⁻¹	TQ425985	Beech woodland	1.34	(3.39)	(Yes)
Acid deposition	Keq ha ⁻¹ yr ⁻¹	TQ422992	Heathland	0.75	(2.10)	(Yes)

20.7.12 It is clear from Table 17 that there are several exceedences within Epping Forest SAC. According to the APIS website, fully 20% of nitrogen currently deposited within Epping Forest derives from road transport exhaust emissions. However, consultation responses have suggested that the actual figure is probably closer to 70% if the vehicle exhaust component of 'London plume' is taken into account. This also includes nitrogen from ammonia derived from vehicle catalytic converters.

20.7.13 While recreational pressure is a considerable impact in some areas, these are localised; however, funding of management on the SAC is governed largely by donation and contributions from the Corporation of London and it is likely that the ability to adequately manage recreation on the SAC will come under increasing pressure as the population of northeast London, Epping Forest and East Hertfordshire increases.

20.7.14 The environmental requirements of Epping Forest SAC are mainly:

- The need to continue to manage recreational access so as to minimise damage to the important habitats present.
- The need to counter negative changes to low-nutrient habitats resulting from atmospheric nutrient deposition. The site is adjacent to the busy M25 and is bisected by numerous 'rat runs.'
- The need to provide optimal grazing input to manage heathland and grassland habitats.
- The need to avoid water pollution
- The need to avoid introduction of non-native species.

Lee Valley SPA and Ramsar

20.7.15 The Lee Valley comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24 km of the valley. These waterbodies

support internationally important numbers of wintering gadwall and shoveler, while the reedbeds support a small but internationally important population of bittern. In addition to the ornithological interest, the site also qualifies as a Ramsar site on account on rare and scarce plants and invertebrates present.

20.7.16 The Lee Valley SPA/Ramsar consists of four Sites of Special Scientific Interest, of which Turnford and Cheshunt Pits SSSI, Rye Meads SSSI and Amwell Quarry SSSI all lie on the Hertfordshire/Essex border. Walthamstow Reservoirs SSSI lies within London Borough of Waltham Forest. The Special Protection Area is managed by the Lee Valley Regional Park Authority and by Thames Water.

Reasons for Designation

20.7.17 The Lee Valley site is designated as an SPA and Ramsar for its Birds Directive Annex I species that over-winter, and these are²⁴⁰:

- Bittern *Botaurus stellaris*: 6 individuals = 6% of the wintering population in Great Britain;
- Gadwall *Anas strepera*: 445 individuals = 2.6% of the wintering population in Great Britain; and
- Shoveler *Anas clypeata*: 287 individuals = 1.9% of the wintering population in Great Britain.

20.7.18 In addition, the site qualifies as a Ramsar under criterion 2 (UN, 2005), by supporting the nationally scarce plant species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Historic Trends and Current Pressures

20.7.19 The Lee Valley is vulnerable to eutrophic water quality; but this is being addressed via AMP4 funding under the Urban Waste Water Treatment Directive and a Water Cycle Study.

20.7.20 The other main threat is that of human recreational pressure, although this is regulated through zoning of water bodies within the Lee Valley Regional Park. The majority of the site is already managed in accordance with agreed management plans in which nature conservation is a high or sole priority.

20.7.21 There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought.

20.7.22 Presently, the SPA/Ramsar remains in favourable condition.

20.7.23 The environmental requirements of Lee Valley SPA/Ramsar are mainly:

- The need to control recreational impacts so as to avoid bird disturbance.
- Maintenance of appropriate vegetation management through grazing, mowing and other relevant techniques.
- Continued inputs of freshwater at appropriate flow volumes
- The need to avoid further eutrophication of water bodies within the SPA/Ramsar, and to avoid any other pollution events.

- The need to avoid introduction of non-native species.
- The need to provide suitable habitat outside the boundaries of the designated area that can be utilised by key species as supporting habitats.

Wormley-Hoddesdonpark Woods SAC

20.7.24 This SAC consists of two SSSIs – Wormley-Hoddesdonpark Woods North and Wormley-Hoddesdonpark Woods South. The semi-natural woodland is of national importance as an example of lowland south-east sessile oak/hornbeam type with the pedunculate oak/hornbeam variant also present. Additionally, small ponds and streams are important habitats for bryophytes.

Reasons for Designation

20.7.25 Wormley-Hoddesdonpark Woods qualifies as a SAC through its habitats, containing the Habitats Directive Annex I habitat:

- Oak-hornbeam forests – this is one of only two outstanding locations for such habitat in the UK.

Historic Trends and Current Pressures

20.7.26 The majority of the woods in the complex are in sympathetic ownership, with no direct threat (Hoddesdon Park Wood for example, is managed by the Woodland Trust). There is some pressure from informal recreation, and there has been limited damage in the past (for example from four-wheel drive vehicles). However, most recreation is concentrated on well-established paths. Most of the complex is covered by a High Forest Zone Plan (Hertfordshire County Council 1996) which sets out a framework for woodland management across the whole area. It aims to restore a varied age structure and natural stand types through sustainable forestry.

20.7.27 There have been some instances of fly-tipping in the recent past, and this does increase the risk on non-native species, such as cherry laurel and privet from garden waste. Coupled with instances of car dumping, this does indicate that the site attracts some urbanisation pressures.

20.7.28 The environmental requirements of Wormley-Hoddesdonpark Woods SAC are mainly:

- The need to minimise impacts from vandalism arson, fly-tipping and dumping, and coupled with this, to avoid introduction of non-native species.
- The need to ensure that recreational levels do not lead to excessive trampling of ground flora, or increased nutrient levels through dog fouling.
- The need to ensure continued hydrological balance on the site with high-quality streams running eastward along the shallow valleys (Wormleybury Brook and Spital Brook), and several ponds.
- The need to avoid negative changes to habitats resulting from atmospheric nutrient deposition.

20.8 Principal Other Plans and Projects

20.8.1 It is neither practical nor necessary to assess the 'in combination' effects of the Core Strategy within the context of all other plans and projects within Hertfordshire and west Essex. In practice

therefore, in combination assessment is only really of relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing and commercial/industrial allocations proposed for other Hertfordshire authorities over the lifetime of the Core Strategy.

- 20.8.2 The Regional Spatial Strategy for the East of England provides a good introduction to proposals for Hertfordshire as a whole, and surrounding counties. At this stage, we have identified a range of plans and projects that may act in combination with the Core Strategy.

Table 18: Housing levels to be delivered across Hertfordshire and west Essex under the East of England RSS

Local Authority	Annual housing average	Total housing from 2001 to 2021
Broxbourne	280	5,600
Dacorum	600	12,000
East Hertfordshire (not including urban extension north of Harlow)	600	12,000
Hertsmere	250	5,000
North Hertfordshire (not including urban extensions at Stevenage and Luton)	310	6,200
St. Albans	360	7,200
Stevenage (includes 9,600 in North Herts)	800	16,000
Three Rivers	200	4,000
Watford	260	5,200
Welwyn Hatfield	500	10,000
Epping Forest (not including Harlow urban extensions)	175	3,500
Harlow (includes urban extension North of Harlow in East Herts and Epping Forest districts)	800	16,000

- 20.8.3 There are other plans and projects that are often relevant to the 'in combination' assessment, most notably Thames Water's Water Resource Management Plan (2008) and the Environment Agency's London Catchment Abstraction Management Strategy. These will all be taken into account in this assessment.
- 20.8.4 The Hertfordshire Waste Development Frameworks are also of some relevance, since this may well contribute to increased vehicle movements on the road network within East Hertfordshire (and thereby contribute to air quality impacts). However, the major impact is likely to be that of housing and commercial development within the surrounding boroughs as set out in Local Development Frameworks and these have therefore been the main focus of cumulative 'in combination' effects with regard to this HRA. Reference will also be made to the Lee Valley Regional Park Authority Park Development Framework, although it is at an early stage of development.

20.9 Principal Data Sources

- 20.9.1 We would not propose undertaking bespoke survey or modelling for this project. In general, detailed survey/modelling is not proportionate or appropriate for a Core Strategy - the CLG draft guidance states that

An AA [of a land use plan] need not be done in any more detail, or using more resources, than is useful for its purpose' and that 'It would be inappropriate and impracticable to assess the effects [of a land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.

- 20.9.2 In other words, the level of detail in the AA should reflect the level of detail in the DPD; AA of land use plans needs to be tiered, just as the plans themselves are tiered, such that the assessment (and the baseline/modelling work that informs it) gains greater specificity as the development(s) covered by the plan gain greater detail, down to the project-level AA where site surveys and detailed modelling are clearly appropriate as impacts can be explored in their fullest detail.
- 20.9.3 The detail contained within the plan is always the main limiting factor regarding the assessment and there is little to be gained from undertaking bespoke surveys if the level of detail within the plan would prevent that additional data from informing a more detailed assessment. A Core Strategy is essentially concerned with the principles (rather than details) of development and in establishing a policy framework; the AA of the plan needs to be pitched at this same level.
- 20.9.4 The most productive assessment can be generated in defining the environmental conditions and criteria that are fundamentally important for the persistence and favourable conservation status of the interest features for which the site was designated (e.g. minimal trampling, low grazing pressure, high water quality etc). By undertaking this short exercise, it is relatively easy to then identify the vulnerabilities of the European site to development.
- 20.9.5 It is our current intention that sources of evidence that we would propose to access in order to determine the relevant pressures for this HRA will primarily consist of:
- The Sustainability Appraisal for the Core Strategy and any data collated to inform it;
 - The East of England Regional Spatial Strategy HRA (2006)
 - The East of England Regional Spatial Strategy: Proposed Changes and Further Proposed Changes HRA (2007)

- Draft Revision to the East of England Regional Spatial Strategy: HRA Technical Report on Water Quality, Water Resources and Flooding (2007)
- East of England Plan Review: Scoping Report for HRA (2008)
- East of England Plan 2001-2021 (2008)
- London Plan (2004)
- Essex and Suffolk Water revised draft Water Resource Management Plan (January 2009);
- Thames Water revised draft Water Resource Management Plan (2008) and Statement of response to consultation (February 2009);
- Three Valleys Water (Veolia) revised draft Water Resource Management Plan (January 2009);
- Upper Lee Catchment Abstraction Management Strategy (2006);
- London Catchment Abstraction Management Strategy (2006);
- Anglian Draft River Basin Management Plan (2008);
- Thames Draft River Basin Management Plan (2008);
- A Water Cycle Study for the Rye Meads catchment is in preparation and will form a key document in the HRA evidence base.
- Local Transport Plans 2006-2011;
- Recreational activity, tourism and European site recreational catchment data – where available we will use data that exists for individual European sites but in many cases these do not exist. In such circumstances we would intend to use appropriate proxy data such as the England Leisure Day Visits Survey data in conjunction with judicious use of the precautionary principle;
- A Green Infrastructure Plan for the Harlow Area (2005);
- East Hertfordshire Parks and Open Spaces Strategy 2007-2012;
- High Forest Zone Plan – Hertfordshire CC (1996)
- Lee Valley Regional Park Authority Site management Plan 2006-2011;
- Epping Forest Management Plan 2004-2010;
- Hoddesdon Park Wood Management Plan 2006-2011;
- European Site Management and Access Management Plans where available
- Stage 3 and 4 of the Environment Agency's Review of Consents process for the European sites covered in this assessment (where available);
- The UK Air Pollution Information System (www.apis.ac.uk);
- Nature on the Map and its links to SSSI citations and the JNCC website (www.natureonthemap.org.uk); and
- The Regional Biodiversity Strategy

- 20.9.6 These lists will be updated as the project proceeds but we would appreciate being notified of any additions to this list that Natural England or the steering group believes can be made at this stage.

21 Next steps

21.1 Consultation on the Scoping Report

- 21.1.1 Task A5 involved consultation on the scope of the SA. The consultation period lasted for seven weeks²⁴¹ (in line with the relevant regulations²⁴²) and during this time the Statutory Consultees and others (see Appendix 1) were invited to comment on the report.
- 21.1.2 Following consultation on the Scoping Report, the comments received have been integrated into the report and are also detailed in Appendix 2. The Scoping Report can now be finalised and the next stage of the SA commence. The next stage involves identifying and evaluating the impacts of the Core Strategy and other DPDs.

21.2 SA of the Core Strategy and other DPDs

- 21.2.1 The framework and evidence base presented in the final Scoping Report will provide the basis for undertaking the SA of the Core Strategy and other DPDs. Other evidence (e.g. from studies undertaken by the Council) will also be drawn on where appropriate. However, East Hertfordshire District Council will have to update the Scoping Report at the appropriate time for subsequent DPDs and therefore undertake further consultation with the statutory consultees and others as appropriate.
- 21.2.2 In order to complete the appraisal, for each spatial area and topic we will ask:
- What will be the situation with the plan?
 - How can we mitigate / enhance effects (Scott Wilson's recommendations to the Council)?
 - How can we best monitor the plan's impacts?
- 21.2.3 In this way, the Core Strategy and other DPDs will be comprehensively analysed in terms of their effects on different parts of East Hertfordshire and the full range of sustainability issues.

²⁴¹ The following is from an East Herts District Council committee report: *The Environmental Assessment of Plans and Programmes Regulations 2004 require a minimum five week consultation period with three Statutory Consultees (Natural England, the Environment Agency and English Heritage). However, given that the consultation is anticipated to commence at the beginning of December and run over the Christmas period, an additional two weeks will be allowed, making the consultation seven weeks in total. It is also proposed that the Town and Parish Councils and other interested parties be advised that the Draft Sustainability Scoping Report is available for comment.*

²⁴² The Environmental Assessment of Plans and Programmes Regulations 2004

Appendix 1 – Draft SA Scoping Report Consultees

SEA statutory consultees

- Natural England
- The Environment Agency
- English Heritage

Other consultees			
• British Waterways	• Ardeley Council	• Great Munden Parish Council	• Thorley Parish Council
• English Heritage	• Aspenden Parish Council	• Hertford Heath Parish Council	• Thundridge Parish Council
• Homes and Communities Agency (HCA)	• Aston Parish Council	• Hertingfordbury Parish Council	• Walkern Parish Council
• East and North Hertfordshire PCT	• Bayford Parish Council	• High Wych Parish Council	• Wareside Parish Council
• Herts and Middlesex Wildlife Trust	• Bengoe Rural Parish Council	• Hornead Parish Council	• Watton-At-Stone Parish Council
• East of England Development Agency (EEDA)	• Benington Parish Council	• Hunsdon Parish Council	• Westmill Parish Council
• Hertfordshire CC	• Bramfield Parish Council	• Little Berkhamsted Parish Council	• Widford Parish Meeting
• Essex CC	• Braughing Parish Council	• Little Hadham Parish Council	• Bishop's Stortford Town Council
• Harlow Renaissance	• Brent Pelham / Meesden Parish Council	• Little Munden Parish Council	• Buntingford Town Council
• East of England Strategic Health Authority	• Brickendon Liberty Parish Council	• Much Hadham Parish Council	• Hertford Town Council
• Hertfordshire Fire and Rescue Service	• Buckland & Chipping Parish Council	• Standon Parish Council	• Sawbridgeworth Town Council
• East Herts Council	• Cottered Parish Council	• Stanstead Abbots Parish Council	• Ware Town Council
• Sacombe Parish Meeting	• Datchworth Parish Council	• Stanstead St Margarets Parish Council	• Broxbourne Council
• Wyddial Parish Council	• Eastwick and Gilston Parish Council	• Stapleford Parish Council	• Welwyn Hatfield Council
• Albury Parish Council	• Furneux Pelham Parish Council	• Stocking Pelham Parish Council	• North Herts District Council
• Anstey Parish Council	• Great Amwell Parish Council	• Tewin Parish Council	• Stevenage Council
• Uttlesford Council	• Stort Valley Project (Agenda21)	• Abbeyfield, Hertford & Ware Society	• Amwell Society

Other consultees			
• Ashlea Amenity Society	• Aston Village Society	• Bishop's Stortford Civic Federation	• Braughing Society
• Buntingford Relief in Need	• Buntingford Civic Society	• Datchworth Society	• Hertford Civic Society
• CPRE - The Hertfordshire Society	• Hertingfordbury Conservation Soc.	• Much Hadham Action Group	• Perry Green & Green Tye Pres. Soc.
• Rush Green Preservation Society	• Tewin Society	• Thundridge & High Cross Society	• The Ware Society
• Watton-at-Stone Conservation Soc.	• Watton and District Agri. Disc. Soc	• Broxbourne Woods Area Cons. Soc.	• Conservation Society
• Countryside Management Service	• East Herts Footpath Society	• Herts & Middx Badger Group	• Herts & Middlesex Wildlife Trust
• Stort Valley Project Team	• Civic Trust	• East Herts Archaeology Society	• Herts Building Preservation Trust
• Buntingford Chamber of Commerce	• Bishop's Stortford Chamber of Commerce	• Hertfordshire Chamber of Comm. & Industry	• Hertford Town Centre M'ment Board
• Bishop's Stortford Mencap	• East Herts Ramblers	• East Herts Council Disability Advisory Panel	• Hertfordshire Action on Disability
• Ware Rotary Club	• Exemplas Limited	• Hertfordshire LSC	• Ashendene Residents Association
• Bishop's Stortford Ratepayers Assn	• Bluecoat Yard Residents Assn	• CAUSE	• Chantry Community Association
• Fanhams Hall Residents Association	• Essex Wildlife Trust	• Hockerill Residents Association	• Kings Mead Community Association
• Marden Hill Residents Association	• Newgate Street Village Committee	• Old Thorley Community Association	• Parsonage Residents Association
• Port Hill Common Residents Assn	• Costley	• West Street Association	• Bishop's Park Residents Association
• Countryside Alliance	• Carers in Hertfordshire	• Youth Create	• Christ Church
• Groundwork Hertfordshire	• CDA for Herts	• Hertford Town Football Club	• Hertford Cricket & Hockey Assc.
• East Herts Green Party	• Hertford Disability Support Group	• Molewood Residents Association	• U3A
• Maple Avenue Frontagers Association	• Essex County Cricket Board	• Sawbridgeworth Tennis Club	• Sawbridgeworth Sports Association
• Tewin Residents Group	• Panshanger Considerate Flying Group	• Herts & Essex Mosque	• Oak Grove Residents Association
• Sawbridgeworth Cricket Club	• Stort Valley Friends of The Earth	• Town Centre Manager	• Clocktower
• B/S Town Centre Management Partnership	• Cyclists Touring Club East Herts	• North Mymms Riding Club	• East Herts Voluntary Sector Development Agency
• Watermill Lane Estate	• Thorley Manor	• Parishes For Rural	• The Roydon Society

Other consultees			
Residents Association	Residents Association	Environment Protection	
• Stop Harlow North	• Hertfordshire Gardens Trust	• Hertfordshire Community Foundation	• Bishop's Stortford Civic Federation
• Bishop's Stortford Natural History Society	• Bayford Action Group	• Rivers Nursery Site and Orchard Group	• National Express
• Civil Aviation Authority	• British Airports Authority (Stansted)	• Harlow and Stansted Gateway Transportation Board	• West Essex PCT
• Essex Police	• Essex County Fire and Rescue Service	• Essex Wildlife Trust	• GO East
• Hertfordshire Police Authority	• Harlow College	• Home Builders Federation	• EDF Energy
• Veolia Water	• BT Openreach	• Anglian Water	• Thames Water
• National Grid Property Holdings Ltd	• Highways Agency	• Harlow Council	• Epping Forest District Council

