

## Comments

### East of England Plan > 2031 Scenarios for housing and economic growth (02/09/09 to 24/11/09)

Comment by	Buntingford Civic Society
Comment ID	621
Response Date	16/11/09 12:27
Consultation Point	Supplementary Question 8 ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3

**Do you have any comments on the four growth scenarios? (please tick all that apply)**

**Do you have any comments on the Integrated Sustainability Appraisal. Is there any further information that should be taken into account?**

The ISA provides much support for the points put forward in our replies to the previous questions. So far as the environment is concerned, the ISA considers only internationally designated wildlife sites. This is too restrictive. The wellbeing of the population is dependent on access to open spaces - a fact well recognized when Green Belts were first established. The growth proposals for Hertfordshire require large areas of the Metropolitan Green Belt to be sacrificed, contrary to its intended purpose of preventing the unrestricted sprawl of Greater London. In some areas there is the real danger of coalescence - eg Stevenage pce Tm(y))Tj-0.5n 48en St Albans

continue developments in this London Commuter Belt area, with the consequent loss of Green Belt land, simply to provide more and more commuter housing.

The ISA underplays the social problems that will be encountered by several small and medium sized towns as the result of too high a rate of growth. Where the growth rate is too high, services become stretched and conflicts arise between newcomers and established residents. The quality of life suffers and the current Plan's objectives in this respect are not met. It is right that, to minimize this difficulty and make best use of the available infrastructure funds, the majority of the growth should be concentrated in the larger towns and cities of the region (or even new larger towns), leaving the growth in smaller settlements to meet the existing local need.

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<b>Comment by</b>	Buntingford Civic Society
<b>Comment ID</b>	620
<b>Response Date</b>	16/11/09 12:26
<b>Consultation Point</b>	Supplementary Question 7 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.4

**Do you have any comments on the four growth scenarios? (please tick all that apply)**

**Do you have any comments on the sub-area profiles?**

The development of Harlow North should not be accepted. The Inspector threw this out at a previous independent review and his findings were overturned by the Secretary of State without reasonable justification. The Sustainability Proposal makes several points that support the line taken by the Inspector. The development of Harlow North along the lines currently proposed will result in harm to the quality of life of those in the district and further encourage more commuting.

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<b>Comment by</b>	Buntingford Civic Society
<b>Comment ID</b>	619
<b>Response Date</b>	16/11/09 12:25
<b>Consultation Point</b>	Question 6 ( <a href="#">View</a> )

<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.4

**Do you have any comments on the four growth scenarios? (please tick all that apply)**

**Do you have any evidence to suggest that policies other than those identified need to be updated or created?** Yes

**Please detail evidence and list which other policies you think need to be reviewed or created**

Although we do not suggest that any policies other than those identified need to be updated, we do have a comment to make concerning the updating of policy H2 (Affordable Housing). Developers are reluctant to distribute affordable housing across a site and prefer to locate it all in one section. There have been recent examples of developers being supported in this regard by East Herts District Council despite their own recommendations in the relevant local SPD. To achieve mixed, inclusive and sustainable communities, and avoid the creation of segregated communities, affordable housing should on all sites be distributed across the site rather than be provided in one single parcel. Any revision of policy H2 should require that this be done.

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<b>Comment by</b>	Buntingford Civic Society
<b>Comment ID</b>	618
<b>Response Date</b>	16/11/09 12:24
<b>Consultation Point</b>	Question 5 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.4

**Do you have any comments on the four growth scenarios? (please tick all that apply)**

**Do you agree that the vision and objectives of the current Plan remain suitable for the revised Plan. If not, what changes would you make and why?** No

**What changes would you make to the vision and objectives and why?**

The vision and objectives are ones with which most people would agree. It is not that they need to be revised but that they need to influence the outcome of deliberations much more than at present. There is a genuine danger that the rates of development proposed by all four scenarios will seriously harm the quality of life of successful communities in small market towns, for example.

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<b>Comment by</b>	Buntingford Civic Society
<b>Comment ID</b>	617
<b>Response Date</b>	16/11/09 12:22
<b>Consultation Point</b>	Question 4 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3

**Do you have any comments on the four growth scenarios? (please tick all that apply)**

**Do you agree we have covered all the regional impacts of the four scenarios that have been identified? If not, what else should we have addressed?** No

**What further impacts should have been considered?**

The only nationally protected landscape in Hertfordshire is a small part of the Chilterns AONB. But much of the rest of the rural area of the county is pleasant, rolling countryside much valued by urban and rural dwellers alike. The growth scenarios in this Review, particularly Scenario 3 in the case of Hertfordshire, threaten these areas of relatively unprotected landscape character and tranquility. Policies ENV1 and ENV2 in the existing Plan call for the development of policies and strategies on Green Infrastructure and Landscape Conservation respectively - work that is still in its early stages - but these growth scenarios will compromise those assets irretrievably.

The plan identifies but fails to fully address the very major problems of:

- . Employment
- . Water supply
- . Sewage Treatment

Employment. Without more positive plans in place for creating employment in the areas of the region closer to London, all that will be achieved as a result of any of the four scenarios is the provision of even more housing for commuters who work in greater London - as has been happening for many years now. This is quite contrary to many of the stated objectives.

Water Supply. Over abstraction of water is already a major issue in much of the area - a situation that will be significantly aggravated by the proposals of the plan. Improving the efficiency of water use by measures such as metering will go only part way to dealing with the problem. To keep on avoiding this issue is to build up a very great problem for the future.

Sewage Treatment. This is another matter which does not appear to be taken at all seriously. In the south of the region there is little spare capacity to deal with future needs and the lead time for new sewage treatment plants is considerable.

One of the greatest criticisms of the existing Plan was that it did not take sufficient account of the lack of infrastructure provision - roads, transport, water resources, etc. This premature review exacerbates the situation regarding infrastructure provision over its whole range.

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<b>Comment by</b>	Buntingford Civic Society
<b>Comment ID</b>	615
<b>Response Date</b>	16/11/09 12:19
<b>Consultation Point</b>	Question 3 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3

**Do you have any comments on the four growth scenarios? (please tick all that apply)**

**What is your preferred growth scenario and why?** Scenario 1

**Please tell us why you prefer Scenario 1**

Of the four scenarios proposed, our preference is for Scenario 1. Meeting the requirements of this and, at the same time, coming anywhere near satisfying the Plan's objectives (iv) and (v) will be extremely difficult. Adoption of the other presented scenarios will lead to even greater harm to the region's environment and quality of life.

<b>Comment by</b>	Buntingford Civic Society
<b>Comment ID</b>	614
<b>Response Date</b>	16/11/09 12:17
<b>Consultation Point</b>	Question 2 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3

**Do you have any comments on the four growth scenarios? (please tick all that apply)** . Scenario 3

**Please enter your comments specific to Scenario 3**

Scenario 3 is said to be influenced by the 'economic potential to create new jobs'. In the case of Hertfordshire the figures appear to be based on past historical information that has not taken recent trends (over and above the effect of the current recession) into account. At one time, Hertfordshire had provided significant levels of employment for well qualified people in the areas of aerospace, pharmaceuticals and electronics. Employment in these areas is now declining and no other major fields of employment are taking their place. Manufacturing industry that might have filled the gap continues to decline. This raises doubts regarding the validity of the assumptions leading to the figures of scenario 3

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<b>Comment by</b>	Buntingford Civic Society
<b>Comment ID</b>	612
<b>Response Date</b>	16/11/09 12:10
<b>Consultation Point</b>	Question 1 ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3

**Do you think we've chosen the right growth scenarios to consider? If not, what other scenario(s) should we consider and why?** No

**What other scenario(s) should we consider and why?**

If EERA had been concerned primarily in working on behalf of the region, it would have included a growth scenario based on the social, employment, economic and environmental needs of the region. Forecasts of the appropriate level of growth for the region should be based on a proper evaluation of environmental capacity and transport and employment issues as well as on population and household formation projections. As it is, EERA appears torn between doing this and doing the bidding of central government who appear to just want more housing for London based commuters. Given that situation, and given the problems of water supply and sewage disposal in the already overpopulated southern half of the region and the need to avoid building extra houses purely to encourage an increase in commuting in and out of Greater London, a scenario should have been included that placed a far greater proportion of the additional growth in the northern half of the region. This view is supported by several of the comments made in the Integrated Sustainability Appraisal.

**Do you have any comments on the four growth scenarios? (please tick all that apply)**