

**STANSTEAD ABBOTTS & ST MARGARETS DRAFT
NEIGHBOURHOOD PLAN 2017 - 2033 REGULATION 14
CONSULTATION**

Presented by the Head of Planning.

SUMMARY

This report considers the current consultation on the Stanstead Abbots and St Margarets draft Neighbourhood Plan (SASMNP). This has been prepared with regard to the policies of the East Herts District Plan, (2018) and the National Planning Policy Framework. The Neighbourhood Plan seeks to promote sustainable development and use of land within the Designated Area through to 2033 and embraces a range of social, economic and environmental issues. It includes site allocations to accommodate at least an additional 94 homes one of which requires the Green Belt boundary to be amended.

The Authority's comments are set out in the draft letter attached at Appendix A to this report. They are generally supportive of the Neighbourhood Plan and the level of detail it contains. The main concern raised relates to housing Site Allocation H3 'Land East of Netherfield Lane/South of Roydon Road', which proposes residential development on a green field site in the Regional Park. Comments also seek the inclusion of further detail about the Regional Park and additional consideration of Park Development Framework Area Proposals.

RECOMMENDATIONS

Members Approve: (1) the comments as set out in Appendix A to this report as the Authority's formal response to the consultation by the Stanstead Abbots and St Margarets Neighbourhood Plan Steering Group on the draft Neighbourhood Plan Regulation 14 document.

BACKGROUND

1 Neighbourhood Planning is a tier of planning policy that enables communities to play a greater role in shaping the development and growth of their area.

Introduced by the Government through the Localism Act 2011, the preparation of a Neighbourhood Plan must follow procedures set out in the Neighbourhood Planning Regulations (the Town and Country Planning England Neighbourhood Planning (General) Regulations 2012) and the Neighbourhood Planning Act 2017 (as amended). Adopted Neighbourhood Plans will form part of the statutory Development Plan used to determine planning applications. As such they are required to meet the following four 'Basic Conditions' or criteria. They must be in conformity with the Local Development Plan, in this case the East Herts District Plan 2018 (EHDP) and the National Planning Policy Framework (NPPF). They must comply with other local, national and European/or UK equivalent policies and contribute to the achievement of sustainable development.

- 2 The Stanstead Abbots and St Margarets Neighbourhood Plan (SASMNP) is supported by a Strategic Environmental Assessment (SEA) which considers the likely effects of the emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects.
- 3 Stanstead Abbots Parish Council, as the lead Parish Council, is the "qualifying body" for the preparation of the Neighbourhood Plan which covers the entire parishes of Stanstead St Margarets (known as St Margarets) and Stanstead Abbots and the south east section of Great Amwell Parish within the village settlement. This is known as the 'Designated Area'. Please see Figure 1 from the Neighbourhood Plan attached as Appendix B to this report – the Regional Park boundary has been added as a layer to this map. The Plan at Appendix C to this report shows the Policies Map as included within the SASMNP with the addition of the Park boundary. The Neighbourhood Plan has been compiled on behalf of the three Parish Councils by a community Steering Group, which was set up on 21st June 2017. A Communications Sub-group have undertaken a range of engagement activities with the local community including open days, surveys delivered to every home, a design workshop, drop-in session, regular articles in the Parish Magazine and a webinar.
- 4 Following the current consultation and consideration of responses, the SASMNP and SEA Environmental Report will be finalised for submission and further consultation. An Independent Examination will then follow at which the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan. If the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by East Herts District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the SASMNP will become part of the Development Plan for East Herts District, covering the defined Neighbourhood Area.
- 5 The Neighbourhood Plan area falls within East Herts district, adjacent to the boundary with the Borough of Broxbourne. The eastern edge of the Designated area lies partially alongside the boundaries of Epping Forest District and Harlow Town in Essex. St Margarets and Stanstead Abbots lie on either side of the River Lea Navigation and the railway line parallel to it. Great Amwell Parish lies to the north of the Station. The Neighbourhood Plan Area includes the part of Great Amwell Parish, the 1950s built estate known as The Folly and the 1980s development which replaced an old maltings, known as Riversmead, and some additional dwellings.

6 Local Plan Context

The EHDP recognises Stanstead Abbots & St Margarets as a village inset from the Green Belt and Policy GBR1 states that “the villages of Hertford Heath, Stanstead Abbots & St Margarets, and Watton-at-Stone will be encouraged to consider whether it is appropriate through the formulation of a Neighbourhood Plan to accommodate additional development”. Policy GBR1 (Green Belt) identifies that where proposals would involve changes to Green Belt boundaries, the District Council will consider making these amendments. The more recent update to the NPPF also now allows Neighbourhood Plans to change Green Belt boundaries if supported by strategic policies e.g., in this case the EHDP.

- 7 Policy VILL1 identifies Stanstead Abbots & St Margarets as a ‘Group 1 village’ and sets a range of parameters for growth in these areas, including: an appropriate scale, development that is in keeping with the character of the village, avoiding the loss of significant open space or important gaps, avoiding an extension of ribbon development, and protecting important views. Supporting text in the EHDP (Table 10) quantifies the increase required for Stanstead Abbots and St Margarets as an additional 94 new homes, i.e. a 10% increase in housing stock (based on the 2011 Census) to be built by 2033. Furthermore, Policy VILL4 protects three Employment Areas within the Plan area, at Leaside Works, Riverside Works (Amwell End) and The Maltings.

8 The Regional Park and Park Development Framework (PDF)

The Regional Park boundary includes parts of the villages of Stanstead Abbots and St Margarets and land that falls within Greater Amwell. In total 260ha of the Regional Park falls within the Neighbourhood Plan area. Notable areas include Rye Meads, and Rye House Gatehouse in the south, the River Lee Navigation and its towpath, and to the north of the A414 Stanstead Innings, and land adjacent to Netherfield Lane. The southern part of Amwell Nature Reserve is also included within the Plan area. Please refer to the Plan at Appendix C to this report.

- 9 The Authority’s Park Development Framework Area 8 Proposals ‘The Upper Valley Rye Meads to Ware’, are relevant to the SASMNP. These include:

- Visitor related proposals which seek to secure access improvements along routes into the Park and between the Park and St Margarets Station and the promotion of circular routes linking to PRoW outside the Park.
- Sport and Recreation proposals seeking commercial opportunities for cycle hire pick up and drop off facilities as well as boating focal points and leisure boat hire.
- Biodiversity proposals to protect, restore and enhance existing habitats, particularly those associated with the Lee Valley SPA/Ramsar site and proposals to maintain the Positive Conservation Management status of Stanstead Innings Local Wildlife site and improve access to nature on site.
- Landscape and Heritage proposals to conserve and enhance the positive character and quality of the countryside and farmland, and the notable heritage assets contained within and avoid adverse impacts on the quality of the recreational and landscape experience within the Park.

- 10 The Authority was approached by members of the SASMNP Steering Group and officers have had a couple of meetings over the last few years to discuss the scope of the Plan, the role of the Regional Park and site allocations options

for potential residential development within the Park.

THE DRAFT NEIGHBOURHOOD PLAN

11 Vision and Objectives

The NP sets out a Vision for its area:

"..to thrive as a diverse and inclusive rural village that supports varied livelihoods and promotes community cohesion and wellbeing. We will promote locally accessible and sustainable development that provides affordable housing whilst protecting the heritage of our area and the individual character of each parish. Our vision includes the enhancing of our green spaces for wildlife and community use, the development and improvement of natural flood defences, and further establishing our place in the wider Lea Valley corridor."

In support of this vision, 18 objectives are included under the themes of housing and design, the riverside, heritage, natural environment, leisure and community facilities, business and employment, and transport. Policies are presented under each of the above themes. Those of most relevance to the Regional Park are considered below.

12 Housing

The SASMNP includes 5 site allocations for housing under Policy SASM H2 'Housing Numbers'. These allocations are informed by the East Herts Strategic Land Availability Assessment 2017, a call for sites exercise and a detailed survey of the Neighbourhood Plan area. 4 small sites are identified which together with an existing permitted site allow for 48 homes. A further allocation for approximately 60 homes on land east of Netherfield Lane (Site H3 on the Policies Map, approx. 3.2ha) brings the total to approx. 108 homes. This total is slightly above the 10% increase identified for Group 1 Villages in the EHDP as 94 new homes.

- 13 Site Allocation H3 Land East of Netherfield Lane/South of Roydon Road is a combined brownfield and green field site located within the Park and the Green Belt. The brownfield element is a redundant factory which now has outline permission for 20 homes and employment use. Members considered this application at Committee in June 2020 (RP/42/20). Whilst redevelopment of a brownfield site was considered acceptable a number of conditions were sought to mitigate any adverse impact from the development on the surrounding Park area, to ensure ecological enhancement within the site and along its boundaries, and to enhance the access route along Netherfield Lane, as an important entry point into the Park. Further detail was also sought about the drainage solution to ensure this will not negatively impact on the water quality of Stanstead Innings or the Rye Meads Site of Special Scientific Interest (SSSI) complex. It is understood that due to the substantial remediation required on site the permission was granted without the requirement for affordable housing. A S106 contribution to the Park for access enhancements and habitat creation at Stanstead Innings was included.

- 14 The SASMNP is seeking to combine the brownfield site with the adjacent unused green fields in order to achieve a combined allocation of 60 homes, secured via a covenant thus enabling the Neighbourhood Plan to reach the housing allocation target. The policy requires 40% affordable housing (on land outside the existing outline permission) plus land for a 6 unit scheme of

community-led housing. Green space should include communal public recreation and play space and the layout should accommodate the retention of all existing trees and hedgerows to minimise loss of countryside and achieve biodiversity net gain.

- 15 In order to accommodate this development, Policy SASM H1 'Village and Green Belt Boundary' proposes that the Green Belt boundary be amended to extend the Village Development Boundary to include the SASM H3 site allocation. This effectively removes the site from the Green Belt although it is still within the Regional Park.
- 16 Site Allocation H4 is located to the south of South Street within the Regional Park and forms the northern part of the Lee Valley Marina, Stanstead Abbots (site H4 on the Policies map, approx. 0.3ha). It lies outside the Green Belt and is viewed by the SASMNP as a small brownfield site within the village settlement area. Housing Site Allocation Policy SASM H4 indicates the site has a capacity for 9 units although it is acknowledged that the site is within Flood Zone 2 and that despite flood defences South Street floods at times of heavy rainfall. The Policy sets out site-specific criteria in terms of the scale, layout and environmental considerations for any future development of the site.
- 17 **Riverside Development**
The SASMNP recognises the importance of the riverside and water related environment in terms of the quality of life of local residents. The Plan seeks to "celebrate the rivers' unique contribution to the village by increasing opportunities for people to enjoy and directly interact with the river." Policy SASM R1 'Riverside Development' aims to ensure all development alongside the river contributes to improvements and enhancements of the river environment and retains and enhances public access or provides new public access where possible. SASM R2 'Floating Structures' considers moorings and floating structures to be acceptable providing they do not detract from the character, openness or views of the river, and do not interfere with recreation and commercial use of the river. Policy seeks to ensure parking spaces and other infrastructure provision for permanent moorings applications.
- 18 **Heritage Assets**
The SASMNP acknowledges the richness of heritage assets in the area, including its archaeological significance and the importance of protecting these whether designated or undesignated. It also highlights the need to raise awareness and deliver accessible guidance and information about their significance. A Neighbourhood Plan Heritage Report has been prepared by the Steering Group as an additional evidence document. Policy SASM HA1 'Heritage Assets' states that development proposals should preserve and enhance all designated heritage assets whether above or below ground and their settings. Non designated heritage assets are also identified in Policy SASM HA2 to ensure development proposals take account of their significance.
- 19 SASM HA4 'Protected Views' identifies 12 views to be protected from inappropriate development. These are considered an important part of the landscape character of the area. Views also contribute to and help preserve the setting of heritage assets.
- 20 **Natural Environment**
The SASMNP includes 3 key objectives relating to the natural environment as follows:

- To protect the Stanstead Abbots & St Margarets countryside setting, landscape, and character, for the benefit of the village itself as well as the wider community, (Objective H).
- To improve protection of assets such as woodland spaces and water networks that are vital for wildlife, but also to the quality of life for residents, (Objective I).
- To maintain irreplaceable species, promote ecosystem diversity and ensure that development results in a net gain in biodiversity, (Objective J).

Policy NE1 identifies Local Green Space to be protected and includes parcels of land within the Park including land adjacent to the Navigation towpath (on the western side), and other spaces and allotments situated to the rear or north of the High Street.

- 21 Supporting text references the Lee Valley SPA/Ramsar Site and its international importance and the sensitivity of this habitat to recreational pressure, air quality reduction and changes in water quality and levels. Both Rye Meads SSSI which lies within the wider Neighbourhood Area and Amwell Nature Reserve SSSI which borders the Plan boundary in the north are part of the SPA/Ramsar site.
- 22 A Habitats Regulations Assessment (HRA) accompanies the SASMNP and this found that only changes in water quality required assessment. The report concluded that the District Plan together with the Neighbourhood Plan would provide a policy framework sufficient to ensure no adverse effects on the integrity of the European Sites, either in isolation or in combination with other projects and plans. An additional policy statement is included as part of Policy SASM H2 'Housing Numbers' which states that support for new dwellings is contingent on upgrades to Rye Meads Wastewater Treatment Works keeping pace with the delivery of housing so as to ensure no adverse effect on the integrity of the Special Protection Area/Ramsar Site.
- 23 Policy SASM NE2 'Nature Conservation' states that development proposals must conserve and enhance biodiversity and deliver Biodiversity net gains of at least 10%. Where development would impact nationally and locally designated sites the SASMNP defers to the East Herts District Local Plan policy NE1 and the conditions it sets to protect sites and ensure mitigation is provided. Policies are also included to protect valued hedgerows and trees (SASM NE3) and to protect natural flood defences and ensure development makes adequate provision for surface water drainage (SASM NE4).
- 24 **Leisure and Tourism**
Policy SASM B4 'Farm and Tourism Related Business' bullet point II. (located within the Business and Employment section of the SASMNP) makes a policy reference to the PDF Area 8 Proposals. It states:
- “II. Proposals for development of leisure and tourism uses that support delivery of the Lee Valley Park development framework for Area 8 will be encouraged, including:
- a) visitor and recreational moorings, boat repair and other boat related services at Stanstead Marina to support recreational use of the waterways; and
 - b) commercial opportunities for cycle hire, leisure boat and water taxi

facilities, in partnership with the Canal and Rivers Trust.”

This policy also offers support for proposals for overnight stay accommodation in association with leisure uses and social and education functions and links this with policy under the Leisure and Community Facilities section - Policy CL4 'New Facilities' which identifies the need for new tourist accommodation in the village.

25 Access and Transport

Transport policies are focused on achieving safe and sustainable transport provision as part of development proposals. Policy seeks to ensure development proposals do not generate unacceptable increases in traffic volume and movements within or through the village, (SASM TR2) and maintain the safety of pedestrians and cyclists. Development which result in the loss of Public Rights of Way (PRoW) or negatively impact the enjoyment of using those rights of way will need to demonstrate how the PRoW will be re-provided or how the impact on the PRoW will be mitigated, (TR1).

26 Implementation

Implementation of the Neighbourhood Plan will be primarily through the determination of planning applications by East Herts District Council with the Plan policies providing criteria against which planning applications are assessed. The Neighbourhood Plan should deliver community benefits and it is understood that spending priorities have been identified by the community through the Plan preparation. These are contained within an Action Plan (appendix J to the NP). Policy SASM IM1 'Spending Priorities' states that "These priorities should be reflected in Section 106 agreements, where appropriate. The Parish Councils in the Neighbourhood Plan Area will direct funding received from any New Homes Bonus, Community Infrastructure Levy, or other funding streams, towards projects which fall within these priorities".

COMMENTS ON THE DRAFT NEIGHBOURHOOD PLAN

27 The Authority's comments on the SASMNP are set out in the draft letter attached as Appendix A to this report. In principle the Vision and Objectives of the NP can be supported and the synergies between the SASMNP objectives for the natural environment, countryside, heritage assets and tourism have been highlighted.

28 Further detail about the Regional Park and the remit of the Authority should be included in the supporting text to highlight the full scope of the Regional Park and its current and future contribution to the local area, in line with the Neighbourhood Plan topics and policy areas. Reference to relevant PDF Area 8 Proposals would also be helpful. Policy SASM B4 'Farm and Tourism Related Business' does reference the Area 8 Proposals in relation to tourism and leisure provision but a consideration of the wider, regional function of the Park should inform policies across other topics such as Housing, Natural Environment, Riverside and Transport. A number of the PDF Area proposals are relevant to the SASMNP Area and could be supported through the SASMNP policies. These are highlighted below and in the attached letter.

29 Housing

The proposed site allocation H3 is of concern. It proposes residential development for an open green field site within an attractive area of the Regional Park and the Green Belt. The site also lies in close proximity to

Stanstead Innings, one of the Authority's 'access to nature' sites designated as a Local Wildlife Site by the County and it would need to be accessed from Netherfield Lane, an important entry point into the Park and a designated Bridleway.

- 30 It is understood that the SASMNP is seeking to provide affordable housing to serve the needs of its local community and that this requires sites of sufficient size; only sites of 10 or more dwellings are obligated to provide a percentage of affordable housing. Hence the allocation of H3 and the proposal to amend the Green Belt boundary in order to provide a site of sufficient size for a range of housing provision. However it is not clear whether the SASMNP has considered the implication of the development in terms of the Regional Park, its landscape character and recreational role, nor is reference made to the PDF Proposals. The only reference is to the need to mitigate adverse impacts from development on the surrounding Lee Valley Park by preserving "as much of the existing hedgerow and treeline as possible," as mentioned in supporting text.
- 31 Policy SASM H3 would result in built development intruding further into the largely rural valley sides which form an important part of the Park's landscape and feature in views out towards the north east. The woodland and vegetated boundaries along field edges has direct connectivity with the woodland and scrub habitat edge to Stanstead Innings and therefore has value in terms of the wider ecology of the area. Development even if screened and well designed will impact upon the wider Park area by reducing the connectivity of habitats, introducing light pollution and increasing vehicular movements along a route that is well used by pedestrians/cyclists and is a designated a bridleway. The SASMNP Steering Group should be asked to reconsider this designation in the light of the above concerns.
- 32 Site allocation H4 (approx. 0.3ha) is noted, this is also land within the Regional Park, owned by the Authority, although in this case it lies outside the Green Belt and forms part of a developed site located on the northern edge of the Lee Valley Marina Stanstead Abbots. It is acknowledged that the site sits within the village settlement area and although within flood zone 2 may have potential for a small residential development. Officers have in the identified the potential of this site for further development, including residential, when considering the Marina operations. At this time however the site forms part of the Marina's business, any change in this position will need to be a matter for future consideration. Inclusion of the site allocation within the SASMNP does not however limit future operations of the Marina business.
- 33 **Riverside**
The emphasis placed on the importance of the riverside and water related environment is to be welcomed. The waterside environment is a focal point for leisure and recreation within the Regional Park and a key habitat underpinning many of the designated sites and biodiversity of the Park. However the competing demands placed on the waterside environment are not easy to balance and policy needs to take this into account. In particular it should consider the ecological significance of the river and other waterbodies and how the impacts of development and other uses can be avoided or minimised. For example light pollution, noise and other forms of disturbance will be a particular issue in this respect. In a number of cases the waterways offer important dark corridors for foraging and commuting wildlife which connect with other habitats up and down the valley.

- 34 Recreational moorings are supported in the Park and contribute to the visitor experience. PDF Area Proposals seek to enhance visitor moorings at Stanstead Lock on the Navigation and River Lea and more generally the recreational use of the Lee Navigation. Proposals are also clear that the development of residential moorings are to be avoided in the Regional Park, and are considered more appropriately located off line and outside the Park where provision for parking and other services can be included without detriment to the waterside environment, its accessibility and visitor enjoyment of the wider Park.
- 35 **Heritage**
It is understood that A Neighbourhood Plan Heritage Report has been prepared as part of the SASMNP process and this has informed the detail and content of policies which are comprehensive in covering designated and non-designated heritage assets, archaeology and protected views. Rye House Gatehouse Scheduled Monument falls within the SASMNP area and is identified as a heritage asset. This is to be supported as is the objective to raise awareness and provide accessible information about the significance of heritage assets in the area. Policy SASM HA1 could include 'awareness raising' as an additional process for development to embrace as part of proposals to assist in enhancing heritage assets. Consideration should also be given to the areas waterway heritage, a key feature of the Lea Valley and the Regional Park.
- 36 **Natural Environment**
The protection of the natural environment particularly the landscape character of the natural floodplain of the Lea Valley and the countryside setting of Stanstead Abbots & St Margarets is to be endorsed. This is also the landscape and natural environment that underpins the Regional Park where the biodiversity value of the landscape has been recognised through national and international designations as well as locally important designations. Policy to protect these designated sites is to be welcomed especially where this complements the Local Plan Policy.
- 37 Policy on Nature Conservation is to be supported although the measures to deliver Biodiversity Net Gain (BNG) as listed in the Policy should take account of the Authority's Biodiversity Action Plan and the work of the Authority at Stanstead Innings. Likewise the Policy included on valued hedgerows and trees SASM NE3 is to be welcomed and supported. This is complementary to the Lee Valley Regional Park Landscape Strategy which has identified the importance of, in this area of the Park, retaining existing or replanting hedgerows along historic field boundaries using locally indigenous species. The aim is to retain the function of this area as a rural backdrop and wooded skyline for the Park and wider Lea Valley. Measures to protect and prevent the degradation of the flood plain set out in Policy SASM NE4 are also to be supported.
- 38 **Leisure, Tourism and Access**
The policy support for leisure and tourism related uses that will help deliver the PDF Area 8 Proposals as set out under policy SASM B4 can be supported. This policy demonstrates how the SASMNP can support the Authority in the delivery of PDF Area Proposals. The need for tourist accommodation within the area and the lack of facilities (with the nearest hotel accommodation being at Roydon marina) is to be noted and this is clearly a matter the SASMNP Steering Group wish to address. There may be scope to explore this matter further in the future particularly if the Steering Group is prepared to consider locations outside the core village settlement.

39 Supporting text in the Leisure and Community Facilities section notes the many walks available and the linking routes through into the valley from sites outside the Neighbourhood Plan boundary. PDF Proposals identify opportunities to improve footpath and cycleway links into the Park, and also reference links to PRoW outside the Park boundary and from St Margarets station. It is considered appropriate to suggest this matter is covered by policy, potentially Policy SASM B4, this would assist in the delivery of PDF Area proposals and improved connections into and through the Park.

40 Implementation

The process for delivering the Neighbourhood Plan is noted. The Plan Policies will provide both the framework to guide development proposals and the criteria against which planning applications are assessed. The spending priorities identified in Appendix J to the SASMNP are mainly focused on transport, community and heritage related actions and the cost implications of the priorities are largely unknown or awaiting confirmation. It would therefore be useful to consider whether any of the PDF proposals support or could inform local spending priorities to secure improvements to the natural environment, and the accessibility of the Regional Park. This could enable closer alignment between the Authority's requests for S106 contributions for mitigation required as a result of development impacts, and projects identified through the Action Plan.

ENVIRONMENTAL IMPLICATIONS

41 There are no environmental implications arising directly from the recommendations in this report but the draft SASMNP once adopted will form part of the 'development plan' for East Herts District which guides and controls development and the use of land within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

42 There are no financial implications arising directly from the recommendations in this report.

HUMAN RESOURCE IMPLICATIONS

43 There are no human resource implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

44 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966. The Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.

45 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

RISK MANAGEMENT IMPLICATIONS

46 There are no risk management implications arising directly from the

recommendations in this report.

EQUALITY IMPLICATIONS

- 47 There are no equality implications arising directly from the recommendations in this report.
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BACKGROUND REPORTS

Stanstead Abbots and St Margarets Neighbourhood February 2023
Plan Consultation

APPENDICES ATTACHED

- | | |
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| Appendix A | The Authority's draft response to the SASMNP consultation |
| Appendix B | Plan showing the Neighbourhood Plan area Fig 1 and Park boundary |
| Appendix C | SASMNP Policies Map with the Regional Park boundary overlaid |

LIST OF ABBREVIATIONS

SASMNP	Stanstead Abbots and St Margaret's Neighbourhood Plan
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
SEA	Strategic Environmental Assessment
HRA	Habitat Regulations Assessment
EHDP	East Herts District Plan
NPPF	National Planning Policy Framework
PRoW	Public Right of Way
NP	Neighbourhood Plan
BNG	Biodiversity Net Gain



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23 March 2023

Dear Julia

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

Thank you for consulting the Regional Park Authority on the draft Stanstead Abbots and St Margarets Neighbourhood Plan (SASMNP). A report on this matter was considered by the Authority's Members, at the Lee Valley Regeneration and Planning Committee on the 23rd March 2023, when the following comments were agreed.

Draft Neighbourhood Plan

Vision and Objectives

The Authority supports the vision and objectives for the Stanstead Abbots and St Margarets Neighbourhood and welcomes the emphasis placed on enhancing the natural environment, protecting local heritage and the neighbourhood's countryside setting whilst also seeking to improve existing community facilities for recreation and leisure and meet needs in terms of housing and employment opportunities.

Stanstead Abbots and St Margarets are attractive villages located within and adjacent to the Regional Park and there is an important relationship to foster between the Park and the local communities. The proximity of the Regional Park, its landscape, open spaces, wildlife and range of walking/cycling routes offer a variety of leisure and recreational opportunities both locally and further afield which bring benefits to the health and well-being of the communities and the economy of the local area. Stanstead Abbots and St Margarets provides important facilities and services both for those visiting the Park, and for regular users.

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

Lee Valley Regional Park and the Park Development Framework

It would be helpful therefore if the SASMNP included more detail about the Regional Park and made reference to the remit of the Authority and the Park Development Framework as it relates to the Neighbourhood Area, (the Area 8 Proposals 'The Upper Valley Rye Meads to Ware'). This detail could be included as part of the context to the designated Neighbourhood Plan area and in the supporting text to relevant policy topics such as the Natural Environment, Nature Conservation, Leisure and Tourism. Site Allocations in particular H3 'Land to the east of Netherfield Lane' should also include reference to the Regional Park and PDF where they are located within or adjacent to the Park. The Regional Park is a statutory designation of relevance within East Herts District and part of the policy context when considering the future of these sites. Officers would be willing to engage further with members of the Steering Group on this matter in due course if this would be helpful.

Housing

Site Allocation H3

The Authority notes the detailed evidence gathering undertaken, local engagement and assessment of options that underpins the housing allocations within the SASMNP. There is concern however that the site allocation H3 'Land to the East of Netherfield Lane' proposes a substantial residential development within the Regional Park and the Green Belt and that to accommodate this the SASMNP policy proposes removing site H3 from the Green Belt.

It is understood that the SASMNP is seeking to identify sufficient allocations for housing development to meet the 10% increase identified for Group 1 Villages by the EHDP. There is an added requirement to source sites of sufficient size to ensure provision for affordable housing to provide for local needs. Hence the allocation of H3 which combines an existing permitted development on a brownfield site with the open fields adjoining in order to provide an area of sufficient size for a range of housing provision including 40% affordable units.

However it is not clear whether the SASMNP has taken into account the Regional Park designation in applying this allocation, or the implications of the development in terms of the Regional Park, its landscape character and recreational role, and the PDF Proposals. The only reference sits within supporting text and this mentions the need to mitigate adverse impacts from development on the surrounding Lee Valley Park by preserving "as much of the existing hedgerow and treeline as possible".

It should be noted that East Herts District Plan policy is supportive of the Lee Valley Regional Park and the Park Development Framework (PDF), Policy CFLR51. In particular, the District Council seeks to support and work with the Park Authority and other stakeholders to deliver the PDF Area Proposals where these improve leisure and sporting opportunities for local communities, enhance access to open space and nature, and help expand educational, volunteering and health related activities. PDF Area proposals 8. A.1 seek the protection, restoration and enhancement of existing habitat potential throughout the area and promote joint working with other landowners to improve ecological connectivity, along the waterways and between key sites such as Stanstead Innings and land to the east, for example the Ryegate Farm area. Proposals also seek to maintain and improve pedestrian and cycle access between Rye Meads and Stanstead Innings and ensure provision for horse riders are maintained; this would be along Netherfield Lane. Landscape Strategy Proposals aim to strengthen the strong rural character of this landscape character area (G1 River Terraces with Farmland) by retaining existing and encouraging the replanting of

hedgerows, managing and extending the existing small wooded areas for their diversity so as to retain the wooded skyline to the valley floor.

Policy SASM H3 would result in built development intruding further into the largely rural valley sides which form an important part of the Park's landscape character and contribute to people's enjoyment of the rural valley landscape. As land rises to the east from Netherfield Lane, development is likely to feature prominently in views out towards the north and east. The woodland and vegetated boundaries along the field edges also have direct connectivity with the woodland and scrub habitat edge to Stanstead Innings and therefore have value in terms of the wider ecology of the area. Development even if screened and well-designed will impact upon the wider Park area by reducing the connectivity of habitats, introducing light and noise pollution and increasing vehicular movements along Netherfield Lane, a route that is well used by pedestrians and cyclists and is a designated bridleway. Development is also likely to create an increase in visitor pressure on Stanstead Innings which would also be a concern as this area is functionally linked to the nearby Lee Valley SPA (Rye Meads) and provides habitat for Bittern, Gadwall and Shoveler noted in the SPA citation. The Authority would ask the SASMNP Steering Group to reconsider this designation in the light of the above concerns.

Site Allocation H4 is noted, this is also land within the Regional Park (and owned by the Authority), although in this case it lies outside the Green Belt forming part of a developed site currently part of the Lee Valley Marina, Stanstead Abbots. The Authority acknowledges that the site also sits within the village settlement area and although within flood zone 2 may have potential for a small residential development. There are a number of constraints in relation to a residential redevelopment of this site however and these have been identified on the site allocation pro-forma. In the past officers have identified the potential of this site for development, including residential, when considering the Marina operations and the Neighbourhood Plan reflects this process. However at this time the site allocation consists of land and buildings required for Marina operations and release of the site for redevelopment will be a matter for future consideration.

Riverside and Heritage

The inclusion of policy for the riverside and water related environment is welcome. Policy SASM R1 'Riverside Development' highlights the many and competing demands placed upon the riverside especially when development is proposed alongside or adjacent to the river. It is difficult to achieve a balance between these competing demands and the pressures they bring. Policy R1 should consider the ecological significance of the river and waterside environment and how impacts from development and associated uses can be avoided or minimised. The riverside environment often acts as a wildlife corridor and connecting habitat between other waterbodies and habitats - it is a key habitat along the length of the Regional Park for example. Key factors that impact here are light pollution from waterside development, increased noise and disturbance across extended time periods, and increased traffic movements.

As well as the river, waterbodies within the Regional Park area have importance for biodiversity both in relation to designated and local sites of importance for nature conservation and in terms of their role as a visitor attraction – the water bodies and associated open space at Stanstead Innings for example, provide a popular site where people can get close to nature and enjoy wildlife throughout the year and accommodate a local sailing club.

Policy SASM R2 sets out guidance for moorings and floating structures to ensure these do not detract from the character and openness or views of the river and to ensure they do not interfere with recreational and commercial use of the river. Recreational moorings are supported in the Park and contribute to the visitor experience. Policy R2 criteria are endorsed; they provide a similar framework to that set out within the PDF Area Proposals. Proposal 8.A.2 'Visitors' identifies "opportunities for recreational visitor moorings and boating focal points to be developed at Ware and Stanstead Abbots. Recreational moorings and support facilities to be improved where the location, scale, design and landscaping does not adversely affect the amenity of the area. The development of linear residential moorings to be avoided." Permanent residential moorings are more appropriately located off line and outside the Park where provision for parking and other services can be included without detriment to the waterside environment its accessibility and visitor enjoyment of the wider Park.

Heritage

The detail and scope of the SASMNP section on Heritage Assets is welcomed. Rye House Gatehouse Scheduled Monument falls within the Neighbourhood Plan area and is identified as a heritage asset and this is supported. Area Proposals within the PDF seek to promote joint working with Historic England and other stakeholders to preserve and enhance the heritage value and interest of the Rye House Gatehouse its setting and moat.

The objective to raise awareness and provide accessible information about the significance of heritage assets in the area (Objective F) should be carried through into policy. For example Policy SASM HA1 could include awareness raising as an additional process for development to embrace as part of proposals to assist in protecting and enhancing heritage assets. Consideration should also be given to the importance of the industrial heritage of the Navigation and the wider Lea Valley, a key feature of the Regional Park.

The importance attributed in the SASMNP to views and vistas and their contribution to landscape character and the setting of heritage assets is to be welcomed. A number of those included are views across the Regional Park and along its boundaries. Two are identified looking along the River Lee Navigation upstream and downstream from the bridge over the Navigation in the High Street. The Authority would seek the inclusion of an additional view both out to and from the rural valley sides to the east. The Lee Valley Regional Park Landscape Strategy notes as a key characteristic for Landscape Character Area G1 'Ryegate Farm/Terbets Hill' the importance of "Long views from the valley slopes across open bodies of water and wetlands within the Lee Valley floor.." and also the importance of this area (which includes the landscape east of Netherfield Lane) as a rural backdrop and skyline in views from the floodplain.

Natural Environment

The Authority endorses the SASMNP objectives which aim to protect the natural environment particularly the landscape character of the natural floodplain of the Lea Valley and the countryside setting of Stanstead Abbots & St Margarets. This is the same landscape and natural environment that underpins the Regional Park where the biodiversity value of the landscape has been recognised through national and international designations as well as locally important designations. Policy to protect these designated sites is to be welcomed especially where this complements the Local Plan Policy.

It is suggested that the SASMNP includes a plan mapping the various nature conservation sites given the significance of these designations and the value of Local Wildlife Sites such as Stanstead Innings.

Policy on Nature Conservation SASM NE2 is supported. Measures to deliver BNG as outlined in the Policy should however also be informed by the Authority's BAP and the work of the Authority at Stanstead Innings. This is a good example of habitat creation and enhancement that serves both wildlife and people. The SASMNP should also consider how other areas of open space and water act as buffers or supporting habitat for the Lee Valley SPA/Ramsar site, and the interconnectivity of the landscape. This will help to inform BNG should off site provision be required and contributions sought for their future management. The PDF Area Proposals also identify a number of actions and projects in relation to biodiversity and habitat enhancement as well as measures to improve access to nature. These should be considered by the SASMNP Steering Group and supported where appropriate.

Policy on valued hedgerows and trees is noted and supported (SASM NE3). The Lee Valley Regional Park Landscape Strategy has identified the importance of retaining existing hedgerows and encouraging the replanting of hedges along historic field boundaries using locally indigenous species. This is considered important in order to retain the function of areas of the Park to the east, which also form the eastern boundary of the Neighbourhood Plan area, as a rural backdrop and wooded skyline for the Park and wider Lea Valley. Landscape Proposals also suggest that the parkland history of land to the east of Netherfield Lane should be considered together with "opportunities to perpetuate the parkland character with specimen trees in new planting".

Measures to protect and prevent the degradation of the flood plain are supported. Policy SASM NE4 mentions the need for development to include an undeveloped buffer of 5 metres from the top of waterways banks, this should be at least 8 metres in order to meet EA requirements and provide ecological benefits.

Leisure and Tourism Policy

The Authority welcomes the policy support set out under Policy SASM B4 for the development of leisure and tourism related uses that will help deliver the PDF Area 8 Proposals. The specific reference to the Stanstead Marina and its role in supporting recreational use of the waterways is also welcomed.

The need for tourist accommodation within the area identified by the Neighbourhood Plan evidence gathering process is noted. Policy SASM CL4 New Facilities suggests the location of new tourism accommodation should be in the village and SASM B4 II refers to support for overnight stay accommodation in association with leisure uses and social and educational functions. Visitor accommodation is a matter that falls within the remit of the PDF and there may be scope in the future for visitor accommodation in the Regional Park within the wider area of the Neighbourhood Plan. The Regional Park currently includes a range of overnight accommodation from camp sites and lodges, a youth hostel and, as referenced in the SASMNP, hotel provision at Roydon Marina. Policy in the SASMNP should consider the benefits of widening the locational scope for the provision of new visitor accommodation. There could be scope for the Authority and the SASMNP Steering Group to explore this further with other relevant stakeholders in the future.

The many walking and cycling routes within the northern section of the Regional Park offer opportunities for the SASMNP area and supporting text in the Leisure and

Community Facilities section references that a number of walks are available with links through into the valley. PDF Proposals identify opportunities to improve footpath and cycleway links into the Park, for example along Marsh Lane and from St Margarets station and to promote circular routes linking to PRow outside the Park boundary. It would be appropriate for Policy SASM B4 to support proposals for improvements to footpaths and cycleways within the Regional Park, particularly at key entrance points into the Park at Marsh Lane and Netherfield Lane and to promote connections through onto the Lea Valley Walk and Lee Valley Pathway from St Margarets Station.

Transport

The Authority supports the policy emphasis on protecting the village from unacceptable increases in traffic volume and traffic movements through the village and the need to maintain the safety of pedestrians and cyclists. The safety of visitors to the Park should also be considered; they are likely to be moving on foot or bicycle along the High Street as well as crossing between the station and the Park's entrance points. It is important to ensure safe crossing points across the High Street particularly at key interfaces, for example where the riverside towpath connects with the High Street. Policy SASM T1 which seeks to protect PRow is supported.

Implementation

The Authority notes that the Neighbourhood Plan will be primarily implemented through the determination of planning applications by the Council and that Plan policies provide criteria against which planning applications are assessed. Appendix J to the SASMNP includes a draft Action Plan which outlines some of the initial spending priorities identified by the community as a result of the Neighbourhood Plan process. The resource/cost implications of the priorities included in the Action Plan are largely unknown or awaiting further detail and the priorities are mainly focused on transport, community and heritage related actions.

There is scope to include other priorities, for example relating to the natural environment, particularly where there are concerns that development proposals are likely to impact on designated sites or locally important habitats and green/water spaces. Should future development impact negatively upon the Regional Park, the Authority is likely to request S106 contributions for any mitigation works required, in line with the PDF Area Proposals. It will therefore be useful to consider whether any of the PDF proposals support or could inform local spending priorities to secure improvements to the natural environment and accessibility of the Stanstead Abbots & St Margarets Neighbourhood area and Regional Park. This could be another matter for future discussion between the Authority and the SASM Neighbourhood Steering Group.

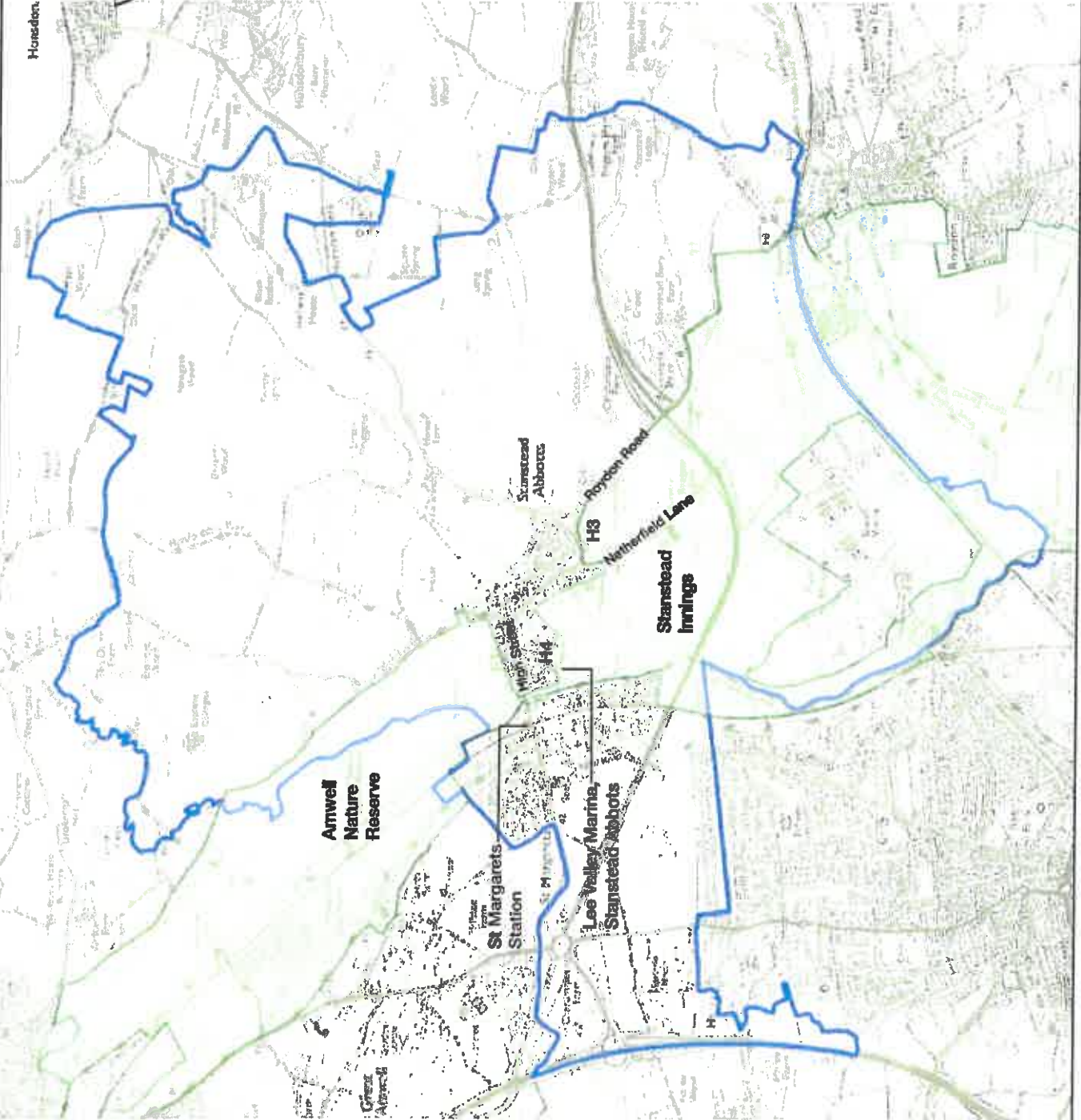
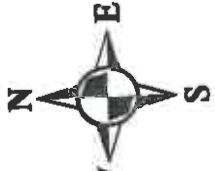
The Authority looks forward to engaging further with members of the SASM Steering Group on the matters raised above prior to the next stage of the Neighbourhood Plan process.

Yours sincerely

Claire Martin
Head of Planning



 Park Boundary
 Neighbourhood Area



Stanstead Abbots and St Margarets Neighbourhood Area

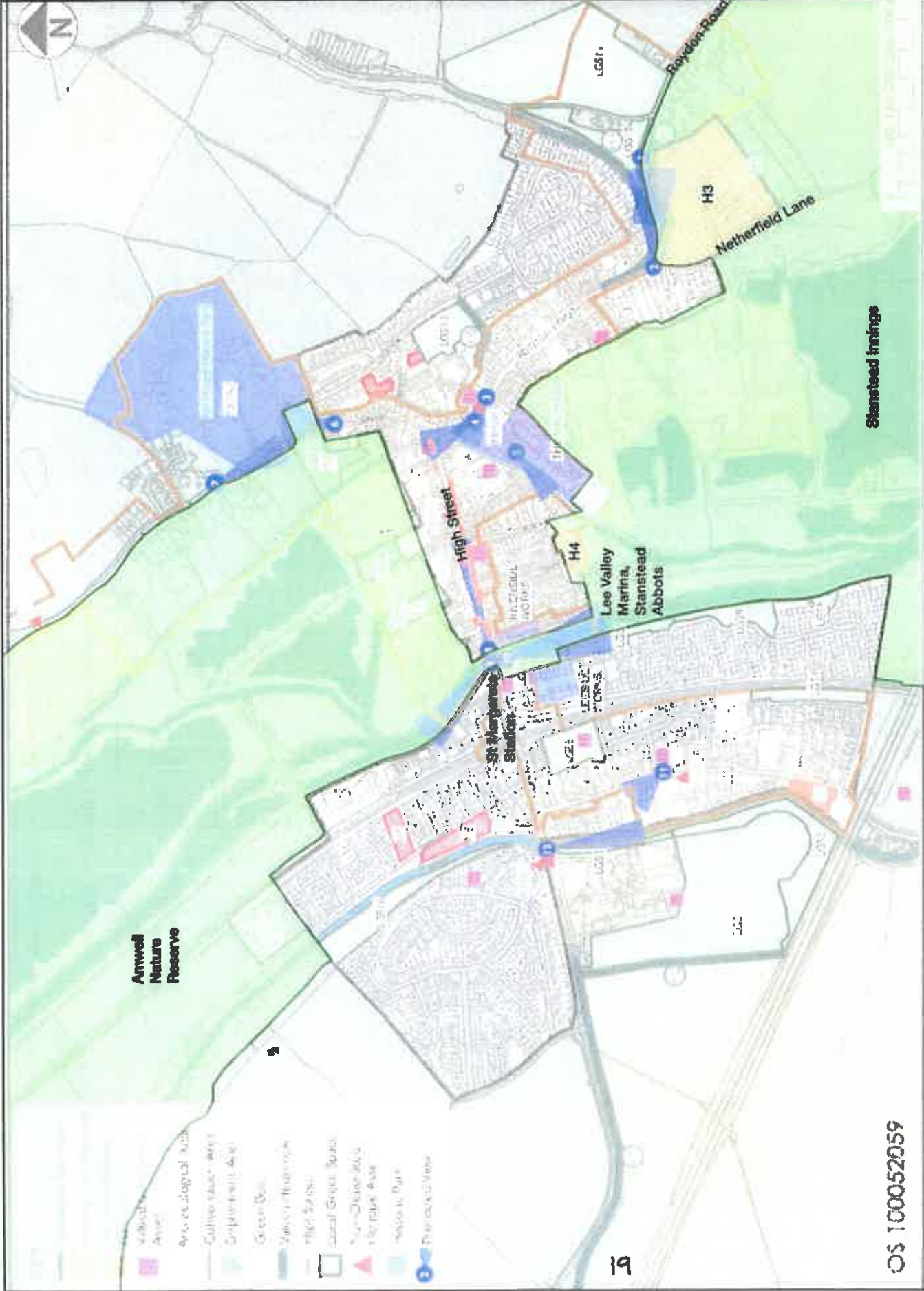
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Park Boundary



Stanstead Abbots and St Margarets draft Neighbourhood Plan

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