

**Question 2 – Why does the spatial strategy include provision, at the proposed garden communities, for substantial development beyond the Section 1 Plan period?**

Since it is clearly intended at this stage that each of the three new garden communities to be developed in the Plan period should form the start of larger schemes, to be developed out over the longer period, we believe it is appropriate for the Part 1 Plan to make reference to the potential future growth of these locations, both in the interests of openness/clarity, and in order that infrastructure providers can give consideration to the best means of ensuring that longer terms needs can be met and served.

The reference in Policy SP2 to future growth beyond the Plan period is only generic in nature, and does not set a specific target or requirement (though it is recognised that broad ranges of figures are subsequently used in Policies SP7-10). In our view, the reference to post-Plan growth at these locations is necessary in order to understand the logic behind the garden community allocations, and their potential to expand in the future to cement their role as large-scale mixed-used sustainable developments.

**Question 4 – Is the detail in paragraphs 3.3 to 3.5 relevant to Section 1 of the Plan? If it is, should it be included in policy SP2?**

We note that in the Inspector’s initial observation on the Plan, as set out in the correspondence of 16<sup>th</sup> October, the point is made at paragraph 7 that it will not be possible to reach conclusions on the extent to which the Part 1 plan is achieving growth requirements, because most of the allocations on which the Plans rest to meet that growth are contained in Part 2.

The specific figures given in paragraphs 3.3 to 3.5 relate to the scale of development arising from the allocations to be made in the Part 2 Plans, which will remain to be tested at the subsequent Part 2 Examinations.

On that basis, it would be inappropriate to put these untested figures in to Policy SP2, and there is no necessity to do so. The figures within the text are effectively contextual to the strategy in SP2, rather than being part of it.

**Question 5 – Should paragraph 2 of the policy refer to the need to avoid the coalescence of settlements?**

Paragraph 2 of the Policy already refers to settlements retaining their distinctive character and role, and in many cases this might well best be achieved by avoiding coalescence. In our view, therefore, the issue of settlement identity is already covered without the need for a specific additional reference to coalescence.

In any event, there are many successful examples of towns that have grown out of necessity, or been planned from the outset, to include amalgamation between nearby settlements. The post-war New Towns provide some examples, such as the inclusion of Old Harlow within the Masterplan for Harlow, and the inclusion of Old Hemel within Hemel Hempstead.

It may well be the case that all three authorities can meet their growth requirements through development allocations that do not give rise to any coalescence between existing settlements, but that does not mean that it justifies precluding any coalescence at all as a strategic principle.

A further secondary consideration to be borne in mind is the vagueness of the term 'settlement' – even the smallest of hamlets can be described as a settlement, and potentially otherwise acceptable and highly sustainable urban extension options might be precluded on the premise of coalescence with even very small groups of existing buildings.

Overall, we see no necessity to add a reference to avoiding coalescence in Policy SP2, and no specific justification for doing so.

**Question 6 – Does the reference to “Garden City principles” ... identify the principles that are intended with sufficient clarity? What is the relationship ... [to] the North Essex Garden Communities Charter?**

No, there is no clarity as to what “Garden City principles” means in practice. As per our representation 6518, reference should instead be made to the Charter, a document that has the specific purpose of explaining how Garden City principles are applicable in this context (see page 4 of EB07 under the heading “What is the Charter”).