



MEETING : DISTRICT PLANNING EXECUTIVE PANEL
VENUE : COUNCIL CHAMBER, WALLFIELDS, HERTFORD
DATE : WEDNESDAY 28 NOVEMBER 2012
TIME : 7.00 PM

MEMBERS OF THE PANEL

Councillors M Carver (Chairman) and L Haysey

All other Members are invited to attend and participate if they so wish.

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DISCLOSABLE PECUNIARY INTERESTS

1. A Member, present at a meeting of the Authority, or any committee, sub-committee, joint committee or joint sub-committee of the Authority, with a Disclosable Pecuniary Interest (DPI) in any matter to be considered or being considered at a meeting:
 - must not participate in any discussion of the matter at the meeting;
 - must not participate in any vote taken on the matter at the meeting;
 - must disclose the interest to the meeting, whether registered or not, subject to the provisions of section 32 of the Localism Act 2011;
 - if the interest is not registered and is not the subject of a pending notification, must notify the Monitoring Officer of the interest within 28 days;
 - must leave the room while any discussion or voting takes place.

2. A DPI is an interest of a Member or their partner (which means spouse or civil partner, a person with whom they are living as husband or wife, or a person with whom they are living as if they were civil partners) within the descriptions as defined in the Localism Act 2011.

3. The Authority may grant a Member dispensation, but only in limited circumstances, to enable him/her to participate and vote on a matter in which they have a DPI.

4. It is a criminal offence to:

- fail to disclose a disclosable pecuniary interest at a meeting if it is not on the register;
- fail to notify the Monitoring Officer, within 28 days, of a DPI that is not on the register that a Member disclosed to a meeting;
- participate in any discussion or vote on a matter in which a Member has a DPI;
- knowingly or recklessly provide information that is false or misleading in notifying the Monitoring Officer of a DPI or in disclosing such interest to a meeting.

(Note: The criminal penalties available to a court are to impose a fine not exceeding level 5 on the standard scale and disqualification from being a councillor for up to 5 years.)

AGENDA

1. Apologies

To receive apologies for absence

2. Minutes (Pages 7 - 18)

To approve the Minutes of the meeting of the Panel held on 26 July 2012.

3. Chairman's Announcements

4. Declarations of Interests

To receive any Member(s)' Declaration(s) of Interest

5. Sub-District Population and Household Forecasts - Parish Groupings and Towns: Phases 1 and 2 (October 2012) (Pages 19 - 96)

6. Strategic Land Availability Assessment (SLAA) - Round 2 Final Report and Windfall Analysis (October 2012) (Pages 97 - 252)

7. Employment Forecasts and Strategic Economic Development Advice (October 2012) (Pages 253 - 264)

8. District Plan: Evidence Base - Technical Studies 2011/12 and 2012/13 (Pages 265 - 280)

9. The Duty to Co-operate and East Herts District Plan (Pages 281 - 298)

10. District Plan Part 1 - Strategy Supporting Document: Member Comments (Pages 299 - 334)

11. District Plan Part 1 - Strategy Supporting Document: Update Report (Pages 335 - 434)

12. Urgent Business

To consider such other business as, in the opinion of the Chairman of the meeting, is of sufficient urgency to warrant consideration and is not likely to involve the disclosure of exempt information.

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MINUTES OF A MEETING OF THE
DISTRICT PLANNING EXECUTIVE PANEL
HELD IN THE COUNCIL CHAMBER,
WALLFIELDS, HERTFORD ON THURSDAY
26 JULY 2012, AT 7.00 PM

PRESENT: Councillor M Carver (Chairman)
Councillors L Haysey.

ALSO PRESENT:

Councillors D Andrews, W Ashley,
E Bedford, R Beeching, E Buckmaster,
Mrs R Cheswright, K Crofton, J Demonti,
T Herbert, G Jones, P Moore, M Newman,
T Page, M Pope, N Poulton, J Ranger,
S Rutland-Barsby, N Symonds, J Wing and
C Woodward.

OFFICERS IN ATTENDANCE:

John Careford	- Senior Planning Officer
Martin Ibrahim	- Democratic Services Team Leader
Martin Paine	- Senior Planning Officer
Laura Pattison	- Assistant Planning Officer
Jenny Pierce	- Senior Planning Officer
Claire Sime	- Planning Policy Team Leader
Katie Simpson	- Assistant Planning Officer
Kevin Steptoe	- Head of Planning and Building Control Services
Bryan Thomsett	- Planning Policy Manager

1 CHAIRMAN'S ANNOUNCEMENTS

The Chairman welcomed the press and public and advised that the meeting was being webcast.

He reminded the meeting of the planning policy process and the role of the Panel in making recommendations, via the Executive, for Council to determine. The Panel noted the timetable of meetings later in 2012 which would lead to Council approving a draft District Plan for public consultation to begin in January 2013. The Chairman reiterated the stepped approach that was being taken in order that a robust Plan could be developed. He referred to other Authorities that had run into difficulties and it would be important for the Council to avoid these pitfalls.

The Chairman expressed his concerns with the delays in receiving the decision on the appeals relating to the Bishop's Stortford schools called in by the Secretary of State and of the abolition of the East of England Plan.

The Chairman also referred to the new standards regime implemented on 1 July 2012, and the requirement for Members to be clear and precise in declaring any Disclosable Pecuniary Interests. In order to avoid public misconceptions, Members needed to declare any relationships with developers, landowners, builders, agents, etc. He emphasised that the process was open and transparent and that there were no "deals behind the scenes". Members were reminded that under the new standards regime, such dealings were now a criminal offence and he suggested that, if any member of the public had any evidence of wrongdoing they should notify the police.

Finally, the Chairman commented that the planning policy process was not about housing, but was more concerned about sustainability, economic development, the environment and maintaining and improving the quality of life in East Herts.

2 MINUTES

RESOLVED – that the Minutes of the Panel meeting held on 29 March 2012, be approved as a correct record and signed by the Chairman.

3 DECLARATIONS OF INTERESTS

Councillor R Beeching gave notice of a pecuniary interest in 4 Newports, High Wych, which was referred to in the agenda documents.

4 LOCAL DEVELOPMENT SCHEME (LDS) VERSION 4 (AUGUST 2012)

The Panel considered a report outlining Version 4 of the Council's Local Development Scheme (LDS), the schedule and work programme that set out when and how the Council would prepare its Development Plan Documents (DPD), namely the District Plan. If approved, it would replace the recently agreed LDS Version 3 - May 2012.

The Panel noted that Version 3 of the LDS had set out a very challenging timetable for the preparation of the District Plan, which was dependent upon the following three key milestones being achieved:

- the decision by the Secretary of State in respect of the planning appeal into the relocation of two secondary schools on Green Belt land to the south of Bishop's Stortford;
- the abolition of the East of England Regional Spatial Strategy (RSS); and
- satisfactory completion of Hertfordshire-wide technical work in respect of the Community Infrastructure Levy (CIL).

The Panel was advised that each of these milestones had been delayed necessitating updating the timetable within the LDS. It was emphasised that these delays were out of

the Council's control.

The Panel recommended the LDS Version 4 as now submitted.

RECOMMENDED - that the Local Development Scheme (LDS) Version 4 – August 2012, attached at Essential Reference Paper 'B' of the report submitted, be supported to take effect from 8 August 2012.

5 **SUB-DISTRICT POPULATION AND HOUSEHOLD FORECASTS – PARISH GROUPINGS AND TOWNS: PHASE 1 (MAY 2012)**

The Panel considered a report setting out the findings of Phase 1 of the Sub-District Population and Household Forecasts technical work that would form part of the evidence base for generating an appropriate District-wide housing target for East Herts to 2031, and would inform the preparation of the District Plan. It also provided demographic information at parish grouping and town level.

The Panel noted that Edge Analytics Ltd had been appointed in March 2012 to undertake population and household forecasting technical work at the sub-district level. This technical work would be undertaken in two phases: Phase 1 provided 'trend-led' demographic information, whilst Phase 2 would test a range of alternative dwelling-based scenarios at the sub-district level. This would enable comparison of the possible housing targets against the 'trend-led' scenarios to understand the potential demographic and housing implications of meeting those housing targets. It was noted that Phase 2 was expected to be undertaken in August 2012.

Councillor G Jones commented on the relationship between trends analysis and forecasting and whether the numbers could be accepted at face value. Officers

responded by emphasising that the forecasts were evidence based and that sustainability tests were at the core of the process.

In response to questions by Councillors Mrs R Cheswright and J Wing, Officers confirmed their confidence levels in the data, which referenced a number of informed sources such as the Office of National Statistics, census data, the electoral register, GP registrations, etc. The document issued for public consultation would include approximate numbers.

The Panel supported the technical study as now submitted.

RECOMMENDED - that the Sub-District 'Population and Household Forecasts - Parish Groupings and Towns: Phase 1' (May 2012) technical study as detailed at Essential Reference Paper 'C' of the report submitted, be supported as part of the evidence base for the preparation of the East Herts District Plan.

6 **STRATEGIC LAND AVAILABILITY ASSESSMENT – STAGE 2 – UPDATE REPORT**

The Panel considered a report updating Members on the progress of the Strategic Land Availability Assessment, which sought to identify a District-wide interim SLAA Round 2 dwelling capacity figure to be used to inform ongoing work in developing the District Plan: Part 1 - Preferred Strategy.

It was noted that Round 2 had applied a site size and location threshold and only considered those sites where there was currently no in-principle objection to their development, i.e. those sites which were located within the development boundaries of the Six Main Settlements and Category 1 Villages. This schedule of 233 sites had been previously agreed by Members. Following the publication of the National Planning Policy Framework, it

was considered appropriate to exclude some sites from this round of the SLAA process, as detailed in the report now submitted. An updated schedule of sites that were assessed was detailed at Essential Reference Paper 'B' of the report submitted.

The Panel also noted the outcome of the stakeholder engagement, the details of which had been posted on the Council's website alongside Officer's initial site assessments. The initial assessments identified capacity of 2,173 dwellings District-wide over a 15 year period. A preliminary assessment of the feedback received did not indicate any material impact on the emerging interim Round 2 dwelling capacity. All comments received would be considered and amendments made, as appropriate, before a final SLAA Round 2 report would be published after being endorsed by Council later this year.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the feedback received from stakeholders as part of Round 2: Stakeholder Engagement of the Strategic Land Availability Assessment (SLAA) be considered and amendments made as appropriate, before a final SLAA Round 2 report is published; and

(B) the use of the District-wide interim SLAA Round 2 capacity of 2,173 dwellings to inform ongoing work in developing the District Plan: Part 1 - Preferred Strategy, be supported.

7 **DISTRICT PLAN PART 1 – STRATEGY SUPPORTING DOCUMENT – UPDATE REPORT**

The Panel considered a report which reminded Members of the work already agreed on the District Plan strategy selection process, and provided an update on minor changes to the proposed methodology and document content. The Panel also considered a proposed Appendix

to the Strategy Supporting Document, focusing on suggested additions to the list of documents which would be considered as part of the evidence base.

The Panel's attention was drawn to Essential Reference Paper 'B' of the report submitted, which detailed the stepped approach to strategy selection. This had been simplified and updated from the version submitted to the previous meeting.

Officers advised that in order to demonstrate the transparency of the process and to provide an audit trail, it was proposed to summarise the evidence base in a series of appendices.

In response to Members' questions on the strategic planning issues of education and water, Officers commented on the iterative process and the need to apply tests on sustainability and infrastructure.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) Essential Reference Paper 'B' of the report submitted, containing the latest version of the 1-page summary of the Stepped Approach to strategy selection for the District Plan, be supported; and

(B) the approach to the Audit Trail, be supported, subject to a period for Member comment on the proposed Appendix B: Documents and Feedback, until 31 August 2012.

8 **DISTRICT PLAN PART 1 – STRATEGY SUPPORTING DOCUMENT – MATERIAL CHANGES TO DRAFT TOPIC ASSESSMENTS**

The Panel considered proposed updates concerning material changes made to the Draft Topic Assessments, which would form part of the emerging Supporting

Document to the draft District Plan: Part 1 - Strategy. These updates replaced the iterations that were reported to the Local Development Framework Executive Panel on 29 March 2012. A schedule of the proposed material change revisions to the Draft Topic Assessments was detailed at Essential Reference Paper 'B' of the report submitted.

Officers advised that the assessment criteria for the 'Land Availability' Topic Assessment had been slightly changed from assessing land availability for 500 dwellings at a density of 20 dwellings per hectare (dph) to 25dph. This density was considered to be a more realistic planning assumption for development of this scale and was more consistent with criteria used in the Strategic Land Availability Assessment.

Other revisions had also been made in respect of Highways Infrastructure and the 'Noise Impacts' Topic Assessment. The Maintaining Tranquillity Topic Assessment (which assessed noise and light impacts) had been deleted in its entirety.

In response to a request from Councillor J Wing, an additional recommendation providing Members with time to comment on the Material Changes until the 31 August 2012, was supported.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the Material Changes to the Draft Topic Assessments attached at Essential Reference Paper 'B' of the report submitted, be supported as replacements to those reported to the Local Development Framework Executive Panel on 29 March 2012, subject to a period for Member comment until 31 August 2012; and

(B) their use be supported as an element of the emerging Supporting Document to the draft District

Plan: Part 1 – Strategy.

9 DISTRICT PLAN PART 1 – STRATEGY SUPPORTING DOCUMENT – CHAPTER 4: PLACES AND NEXT STEPS

The Panel considered a report explaining the obligations of East Herts Council under the National Planning Policy Framework (NPPF). It presented the latest round of work on the agreed strategy selection process and sought agreement to commence further assessment of a list of possible alternative greenfield development options, as a basis for the final stages of strategy selection.

The Panel was advised that in order to produce a “sound” plan, the Council would be obliged to adhere to processes and procedures which had been designed and agreed by the Council to robustly demonstrate compliance with the NPPF. Many Local Planning Authorities had recently found their proposed strategies declared unsound, and had therefore had to rewrite their plans in order to achieve compliance. The Stepped Approach to strategy selection already agreed by the Council provided the basis for compliance.

The Panel noted that the agreed range of figures for housing need was between and 10,000 - 17,000 dwellings over 20 years. Based on the interim Strategic Land Availability Assessment figure of around 2,000 dwellings within the Built Up Areas of existing settlements, this was still likely to leave a shortfall of between 8,000 and 15,000 dwellings over the period. Therefore, the Panel was advised of the options, mostly comprising Greenfield development outside current settlement boundaries, which would need to be assessed further in Chapters 5 and 6.

A number of Members made comments and asked questions relating to the sieve assessments. Officers advised that it was essential for the Council to be able to demonstrate that the options had been fully tested and subjected to rigorous challenge. In respect of villages, it

was noted that parish councils could look at figures higher than 10% if they wished, via the NPPF provisions for Neighbourhood Plans. Regarding major settlements on the borders of the District, it was noted that the “duty to cooperate” required the Council to assist neighbouring Authorities and to look objectively at their plans.

In respect of new settlements, Councillor M Newman expressed concern over the process used in the assessments and the conclusions reached. He quoted an extract from the report which stated that the evaluations were informed by the assessments but were not based on rigid application of the scoring system. This suggested to him that the process was not transparent and raised many questions about commercial influences. In particular, he questioned the conclusions reached for the Area 69: Hunsdon Area and queried why this option had “more potential” than other new settlement areas, given the infrastructure failings identified in the assessment.

Councillor M Newman also referred to the Issues and Options consultation, the findings of which, he believed, had been ignored, as there was no mention of it. Finally, he referred to the section references in Essential Reference Paper ‘C’ of the report submitted, which did not appear to make sense.

In response, Officers commented on the traffic light assessment and advised that the process was not rigid. It was acknowledged that there were problems with specific sites in planning terms, but they had to be assessed objectively and tested fully. A number of options would likely drop out following further sieving. The feedback from the Issues and Options consultation had not been ignored and the issues raised had been addressed in accordance with the procedure already agreed by the Council. Finally, the referencing errors in Essential Reference Paper ‘C’ would be amended.

The Panel supported the recommendations as now detailed.

RECOMMENDED - that (A) the Draft of Chapter 4: Places contained in Essential Reference Paper 'B' of the report submitted, and consisting of Sieve 1 and Sieve 2 in the strategy selection process, be supported;

(B) the scenarios presented in the report and explained in more detail in Essential Reference Paper 'C' of the report submitted, be supported for further assessment in Chapters 5 and 6; and

(C) Essential Reference Papers 'B' and 'C' of the report submitted, be supported, subject to a period of Member comment in respect of factual content, until 31 August 2012.

The meeting closed at 8.57 pm

Chairman
Date

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL - 28 NOVEMBER 2012
EXECUTIVE - 4 DECEMBER 2012

REPORT OF THE EXECUTIVE MEMBER FOR STRATEGIC
PLANNING AND TRANSPORT

SUB-DISTRICT POPULATION AND HOUSEHOLD FORECASTS -
PARISH GROUPINGS AND TOWNS: PHASES 1 AND 2 (OCTOBER
2012)

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents the findings of the Sub-District Population and Household Forecasts technical work (Phases 1 and 2) that will form part of the evidence base for generating an appropriate district-wide housing target for East Herts to 2031, and to inform the preparation of the District Plan. It provides benchmark demographic information at parish grouping and town level.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:</u>	
(A)	the Sub-District 'Population and Household Forecasts - Parish Groupings and Towns: Phases 1 and 2' (October 2012) technical study at Essential Reference Paper 'B' to this report, be supported as part of the evidence base to inform and support the East Herts District Plan.
<u>RECOMMENDATIONS FOR COUNCIL: That:</u>	
(A)	the Sub-District 'Population and Household Forecasts - Parish Groupings and Towns: Phases 1 and 2' (October 2012) technical study at Essential Reference Paper 'B' to this report, be agreed as part of the evidence base to inform and support the East Herts District Plan.

1.0 Background

- 1.1 In line with the Government's Localism agenda, the National Planning Policy Framework (NPPF) and the impending abolition of regional strategies, local planning authorities are solely responsible for setting their district-wide housing target, based on objectively assessed needs for market and affordable housing.
- 1.2 In July 2011, East Herts Council joined with the Greater Essex grouping of local authorities to commission Edge Analytics Ltd to undertake (strategic demographic technical) work in respect of population and household forecasting to provide robust evidence to support setting its own district-wide housing target. This work is being undertaken in stages and the final study is due for completion in January 2013, for use in finalising the East Herts District Plan: Part 1 - Strategy, for consultation in spring/summer 2013.
- 1.3 In addition to the strategic demographic work, it was considered appropriate to investigate whether demographic information and household projections could be obtained at a sub-district level, within East Herts in order to provide benchmarking demographic information to inform the preparation of the East Herts District Plan.
- 1.4 Phase 1 of this sub-district work was reported to Members at the District Planning Executive Panel on 26th July 2012. For completeness, this report presents both Phases 1 and 2 and these are attached as the full report at **Essential Reference Paper 'B'**.

2.0 Report

- 2.1 The Sub-District Population and Household Forecast work is a technical model. Such models are routinely used to predict likely future outcomes in order to understand the implications of the imposition of policy or decisions. As is the case with all technical modelling work, in order to generate the 'outcomes', the model is based on a number of 'input' assumptions.
- 2.2 For Phase 1 of this study, the 'input' assumptions e.g. fertility (birth) rates, mortality (death) rates, life expectancy rates, gender rates, and rates of household formation, are based on past demographic trends (i.e. how the local population changed over the past five to ten years). It is these trends that are then

projected forward to generate assumptions about the likely future population. Trend scenarios provide an indication of likely trajectories of growth if recent demographic conditions continue.

- 2.3 A number of different 'scenarios' have been tested, including varying the effects of migration (i.e. movement of population in and out of the district). Migration is a key component of demographics because it alters the structure (age and household) of the population. Phase 1 has been undertaken at two small area geographies: towns and parish groupings (i.e. towns and their rural hinterland).
- 2.4 Phase 2 of the study tests a number of 'policy driven' housing distribution scenarios. These have been developed by Officers as part of the District Plan preparation process (still ongoing) and provide an alternative view, based on local perspectives on the likely potential capacity of an area to accommodate development.
- 2.5 For information, the scenarios are set out in **Essential Reference Paper 'C'**. These are draft scenarios for testing purposes only and have been developed to assist with the various technical modelling work that is being undertaken as part of the preparation of the District Plan. The scenarios are based upon the agreed position at the end of Step 4: Sieve 2 Settlement Evaluations. Reflecting the likely location of new development, Phase 2 has been undertaken at parish grouping small area geography only.
- 2.6 To draw meaningful conclusions, technical models need to compare 'like with like'. As such, the scenarios are compiled from the broad locations to similar total amounts. However, two groups of scenarios were developed in order to provide an indication of the impacts at higher and lower levels of development. This reflects a need to get a sense of the different impacts at different levels of growth. Indeed, the purpose of the scenarios is to provide an insightful assessment framework rather than an 'answer'. Given the number of potential options, and the ongoing process of refinement through the stepped approach to strategy selection, it is not possible to fully test all options. Therefore the scenarios have been developed with sufficient degree of differentiation to provide an indication of the likely impacts in a manner proportionate to strategic planning.
- 2.7 Phase 2, therefore, assesses the potential impacts of a range of potential housing distribution scenarios upon the projected population. In evaluating these scenarios, the forecasting model

uses its 'migration' element to balance population growth against proposed housing development.

- 2.8 The scenarios tested in Phases 1 and 2 are compared in Section 7 of **ERP'B'** (pages 47 to 62) and some commentary is provided. It is also useful to set out some general conclusions, in particular to recognise the importance of the age-structure upon household numbers.
- 2.9 If housing growth exceeds the expected 'trend' projection of population, then net in-migration will result. Conversely, if planned housing growth is insufficient to meet the needs of the population growth assumed by the trend projection, out-migration results. If sufficient housing is not provided in a particular area, existing local people and newly forming households may need to move from that area and/or people may not be able to move into an area. This then puts increasing pressure on other areas to accommodate the population. In these circumstances, population and housing needs do not disappear: they end up being redistributed.
- 2.10 In the absence of any net in-migration, because East Herts (like many parts of the UK) has an ageing population, the retired population (as a proportion of the total population) will increase. An older age profile will typically result in a larger number of households due to the proliferation of one and two-person households. It is net in-migration that would typically help to maintain a more 'youthful' population profile and thus result in a higher average household size (fewer households per head of population). A net inflow of migrants with a youthful age-profile would generally result in a lower retired proportion and a more balanced mix of one, two and 3+ person households.
- 2.11 As examples, in Bishop's Stortford and Northeastern Parishes, a smaller population increase results in a greater change in households, whereas in Hertford and Central Southwestern Parishes despite significant differences in population change, household change and the average number of dwellings are statistically identical.
- 2.12 It must be stressed that the findings presented in this technical work do not provide the 'answer' to the level of housing growth in a particular area. They are simply the starting point for plan-making purposes by providing information in respect of likely future population and households.

- 2.13 The value of the Sub-District Population and Household Forecasting work is that for the first time it provides benchmark demographic information to support policy decisions in the District Plan. This enables the Council to acknowledge with the highest level of confidence available, the demographic implications (including both not meeting or exceeding what may be needed) of different levels of housing growth on an area. It robustly resolves the question as to what the 'internal' population needs of a particular area are.
- 2.14 However, that is not to say that the Population and Household Forecasting work dictates what the level of housing growth should be. That is the role of the District Plan process, through public consultation and public examination to determine the appropriate level of housing growth for both East Herts as a whole and areas within the district.
- 2.15 Indeed, it may be the case that, in planning terms, a particular location cannot accommodate the level of development required to meet its housing needs. Equally, there may be valid planning reasons why a particular location should accommodate more than its forecasted growth.
- 3.0 Implications/Consultations
- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

Report to District planning Executive Panel - 26th July 2012 Agenda Item 6: Sub-District Population and Household Forecasts - Parish Groupings and Towns: Phase 1 (May 2012)

<http://online.eastherts.gov.uk/moderngov/ieListDocuments.aspx?CId=151&MId=2025&Ver=4>

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>People This priority focuses on enhancing the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable.</p> <p>Place This priority focuses on the standard of the built environment and our neighbourhoods and ensuring our towns and villages are safe and clean.</p> <p>Prosperity This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic and social opportunities.</p>
Consultation:	N/A
Legal:	N/A
Financial:	District Plan technical work is being funded from the Planning Policy/LDF Upkeep Budgets.
Human Resource:	Existing Planning Policy staff resources are being used to undertake this technical study.
Risk Management:	In order to be found sound at examination, it is essential that the District Plan should be based on a robust evidence base, of which the Population and Household work forms a key part, especially in light of the impending abolition of the East of England Plan.

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East Hertfordshire

Population & Household Forecasts - Parish Groupings & Towns -

Incorporating Phase 1 and Phase 2 analysis

October 2012

edge analytics

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The authors of this report do not accept liability for any costs or consequential loss involved following the use of the analysis presented here, which is entirely the responsibility of the users of the analysis.

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1. Introduction

1.1. Context

Since 2006/7 and the onset of the economic recession, new dwelling completions have fallen considerably. The Government has also introduced a more local approach to planning including the intention to abolish Regional Spatial Strategies (RSS) and their associated district-wide housing targets.

East Hertfordshire (East Herts) is a partner on the Demographic Study commissioned by the Essex Planning Officers' Association (EPOA) and completed by Edge Analytics Ltd. East Herts is a large polycentric district with five separate towns and no single, dominant centre. Whilst the work being carried out by Edge Analytics for the EPOA is very useful at district level, East Herts wishes to undertake further work at a sub-district level.

1.2. Requirements

East Herts Council is seeking to develop a more informed view of the recent and future development of its local communities, through the provision of additional demographic intelligence that can support the local development framework.

It wishes to use this intelligence to both inform its own views on the scale and distribution of future development but also to provide robust evidence which may at a future date be used to engage in consultation with local stakeholders across the district, taking into account local policy decisions.

The requirements of this project can be separated into two distinct stages. Firstly, East Herts would like to develop housing requirement figures for sub-district geographies ('Towns' and 'Parish Groupings') to use as a starting point towards informing strategic plans. The Council therefore requires a range of forecast scenarios to be conducted for both Parish Grouping and Town areas in order to inform the plans. The second stage in the project process is to make an assessment on the potential impacts which strategic housing plans would have upon the projected population of East Herts, but at the Parish Grouping level only.

1.3. Summary of methodology

The requirements for the first phase of this project have been met through the analysis of official statistics in conjunction with additional local information. Alternative projections have been developed using the POPGROUP suite of population and household models, testing alternative

'trend-led' and 'policy-led' growth trajectories. East Herts Council has previously undertaken a joint Strategic Housing Market Assessment (SHMA) with Broxbourne, Harlow, Epping Forest, Uttlesford and Brentwood, produced by ORS in 2008. Although the original SMHA included neighbouring districts, these small area projections are constrained to the East Herts district boundary. The Parish Groupings used in this study reflect the housing market areas identified for East Herts district in the SHMA. As such, the results for the Parish Groupings can be aggregated to provide results for each housing market area.

The second phase of the project tests a range of housing scenarios at Parish Grouping level, altering the dwelling constraints imposed on the population and household projection model in accordance with 20 year dwelling totals supplied by East Herts Council. A total of 7 housing-led scenarios have been tested to evaluate the impact upon population and household numbers.

1.4. Document structure

Definitions of the Parish Grouping and Town sub-district areas are detailed in Section 2. Section 3 describes the main sources of data used in the analysis and summarises the methodologies employed to develop the scenario forecasts. Section 4 provides an analysis of historical trends in population change in each of the defined sub-district areas. Section 5 details the results of the range of growth scenarios which have been tested on each Parish Grouping and Town area. Section 6 reports on phase 2 of the project, detailing the demographic impact of proposed housing targets on the East Herts Parish Groupings. Section 7 presents the findings alongside the growth scenarios developed in Section 5 in order to facilitate a comparison. Conclusions are presented in Section 8. Additional statistics on changing average household size associated with each scenario are provided in the Appendix.

1.5. Scope of study

The purpose of this study is to examine the demography of East Herts from a range of perspectives. It is not the intention of this project to produce a recommended or preferred demographic forecast or housing target for East Herts District or its small geographic areas. Instead, it enables East Herts Council, through its District Plan, to arrive at an appropriate housing target for East Herts to 2031. The use of trend based data is an accepted and established method for estimating the future demography of an area. It is not within the remit of this study to consider whether any predicted demographic change is appropriate. Rather, it is simply to estimate based on the current demography and likely trends, what the future demography of an area will be.

2. Area definitions

East Herts District is a largely rural area, containing five separate towns. For projection analysis, two sub-district geographies have been defined: Parish Grouping and Towns.

There are six Parish Groupings:

1. Bishop's Stortford and Northeastern
2. Buntingford and Central Northern
3. Hertford and Central Southwestern
4. Sawbridgeworth and Southeastern
5. Ware and Central Southern
6. Western

The boundaries of these areas are displayed in Figure 1.

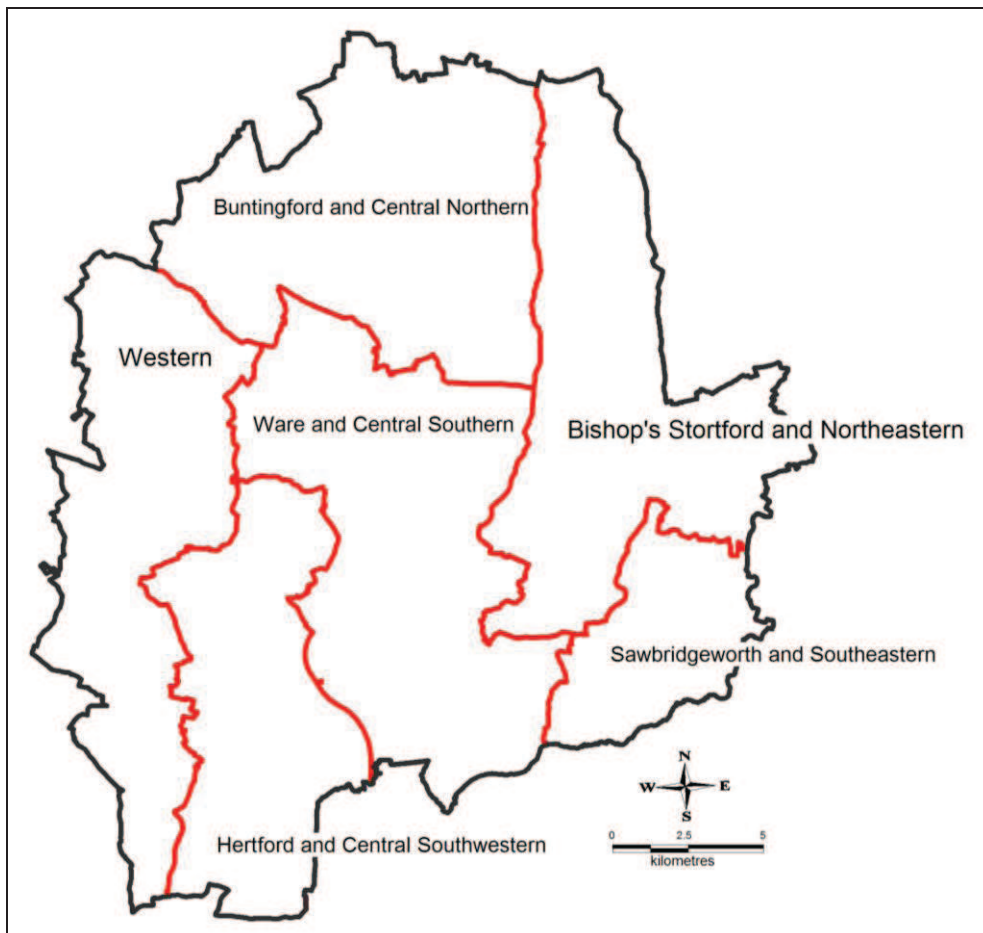


Figure 1: Parish Groupings in East Hertfordshire

There are five Towns within East Herts:

1. Bishop's Stortford
2. Buntingford
3. Hertford
4. Sawbridgeworth
5. Ware

The residual area has been designated 'Rural', and has been included as part of the Town forecasts within this report.

The boundaries of the towns are displayed in Figure 2.



Figure 2: Towns in East Hertfordshire

3. Demographic statistics and forecast methodology

3.1. Demographic data – official statistics

In the absence of a population register, England and Wales rely on successive, annual updates of 2001 Census data to produce mid-year population estimates. The Office for National Statistics (ONS) estimates the mid-year population for each local authority area using data on births and deaths, internal migration and international migration. These estimates provide the statistical baseline for the creation of both national and sub-national population projections (SNPP). SNPP for England are produced on a two-yearly cycle by ONS and are constrained to the total, national projection estimates. Household projections are produced by Communities and Local Government (CLG) and typically follow the delivery of the SNPP. Household projections are produced through the application of headship rates (by household type, age and sex) to the age-sex profile of the population projected in the SNPP statistics (Figure 3).

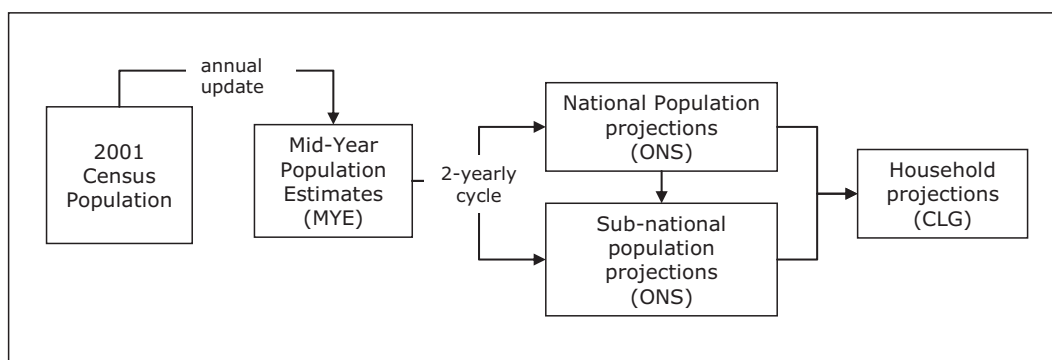


Figure 3: Official statistics: population and households

With regard to the robustness of the data inputs that underpin the ONS MYE, birth and death statistics are derived from vital statistics registers and provide an accurate measure of natural change by local area. Internal migration data are derived from GP registers, providing the best available representation of inter-district flows. International migration is the most difficult component to estimate with confidence.

The accuracy of the ‘components of change’ (births, deaths, internal migration and international migration) in the MYE is critical to the development of SNPP (and therefore the household projections). Historical trends for a prior five-year period provide a key input to the ‘trend’ based SNPP (i.e. evidence from 2006-2010 will drive the 2010-based projections). Recognition of the relative importance of the components of change within the MYE is necessary in order to interpret what is driving the 25-year trend projection of the SNPP.

For local authorities considering the development of alternative growth strategies, the ONS 'official' statistics on population and households provide the 'benchmark' against which a range of alternative evidence should be compared. However, the ONS SNPP provide only one growth trajectory - a trend-led forecast that is typically based on historical data that has already been superseded by more recent evidence. In developing a robust, realistic and defensible evidence base to support housing policy and plans, it is advisable to consider a range of alternative growth scenarios.

The development of alternative scenarios is particularly important as ONS has released 'revisions' to its population estimates methodology that has had a direct impact upon trend projections. ONS has an ongoing programme of 'improvement' to its estimation methodologies to ensure the most accurate data on immigration and emigration is used in its MYE. In 2010, ONS released a set of 'revised' MYE for 2001-2009 and a revised 2008-based population projection, which took account of a number of such improvements; specifically, the improved handling of onward student moves and the integration of administrative data sources to better estimate the local impact of international migration. In November 2011, ONS released further revisions to MYE for 2006-2010, using a revised methodology for international migration estimates based upon an approach developed by Dr Peter Boden and Professor Phil Rees working at the University of Leeds (see references below).

Boden P and Rees P (2010) Using administrative data to improve the estimation of immigration to local areas in England, *Statistics in Society – Series A*, Volume 173 Issue 4m, p707-731, October 2010 <http://onlinelibrary.wiley.com/doi/10.1111/j.1467-985X.2009.00637.x/abstract>

ONS (2011) Improved Immigration Estimates to Local Authorities in England and Wales: Overview of Methodology <http://www.ons.gov.uk/ons/guide-method/method-quality/imps/improvements-to-local-authority-immigration-estimates/index.html>

These latest revisions, although yet to be made 'official statistics', have been used for the district and sub-district analysis presented in this report. They have a significant impact upon the sub-district MYE and therefore upon trend projections that are based upon these MYEs.

During the course of this project, ONS has also released its latest 2010-based SNPP. They are presented as alternative projections in this analysis, for comparison with other scenarios. In addition, population statistics from the 2011 Census plus 2011 mid-year population estimates have been released. These new data do not feature in this analysis but will be part of the Phase 4, Essex Planning Officers Association (EPOA) study, due for completion during October-December 2012.

3.2. Forecast methodology

POPGROUP software has been used to generate the population and household forecasts presented in this report. POPGROUP uses a standard **cohort component** methodology for its population projections (the methodology used by the UK statistical agencies). The household projections use a standard **household headship rate** as employed by Communities and Local Government (CLG) for its household projection statistics. A more detailed description of the population and household projection methodologies is available from the User Guide and Reference Manuals on the POPGROUP website www.csr.ac.uk/popgroup/about/manuals.html. The following illustrations provide a schematic of the operation of the POPGROUP and Derived Forecast methodologies (Figure 4 & Figure 5).

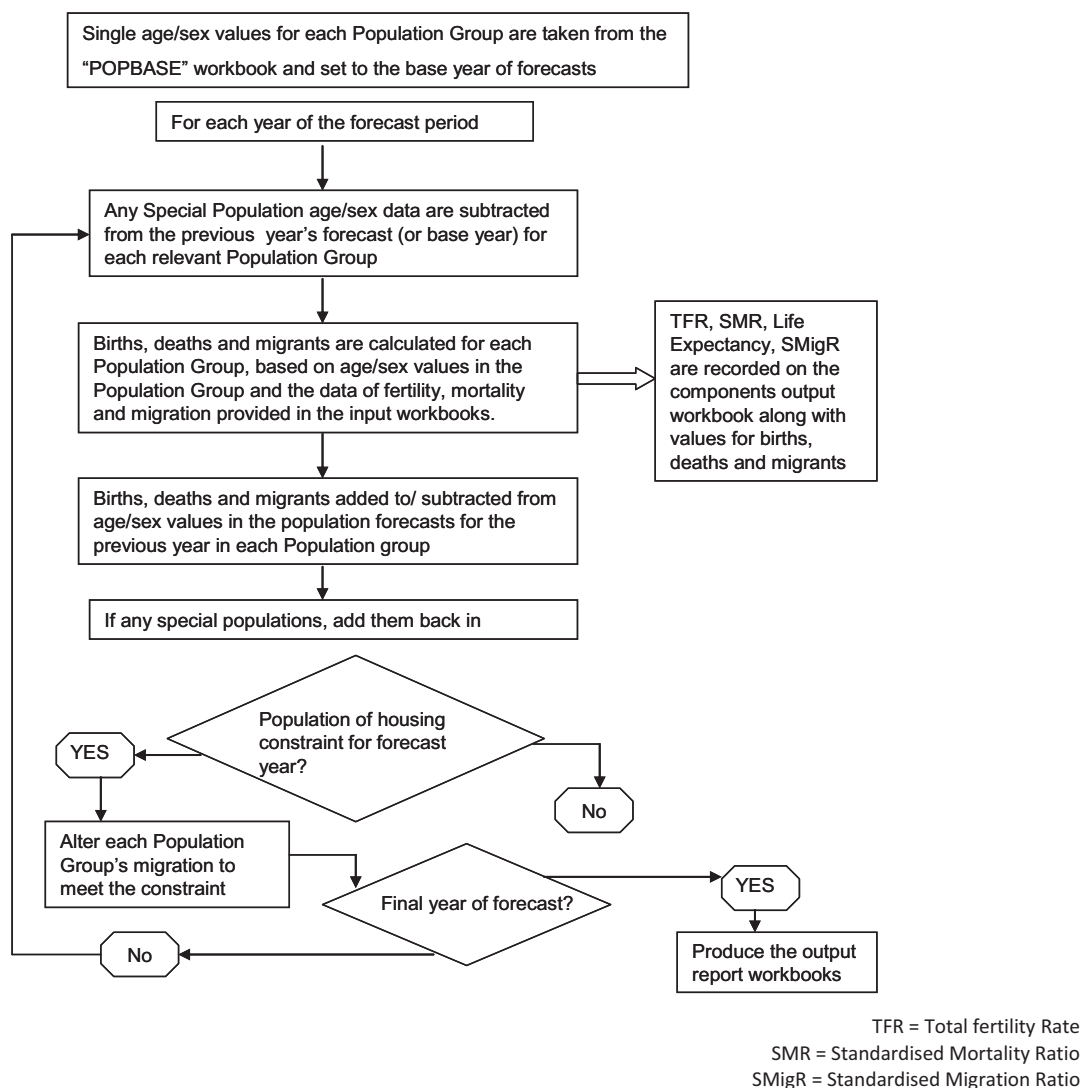
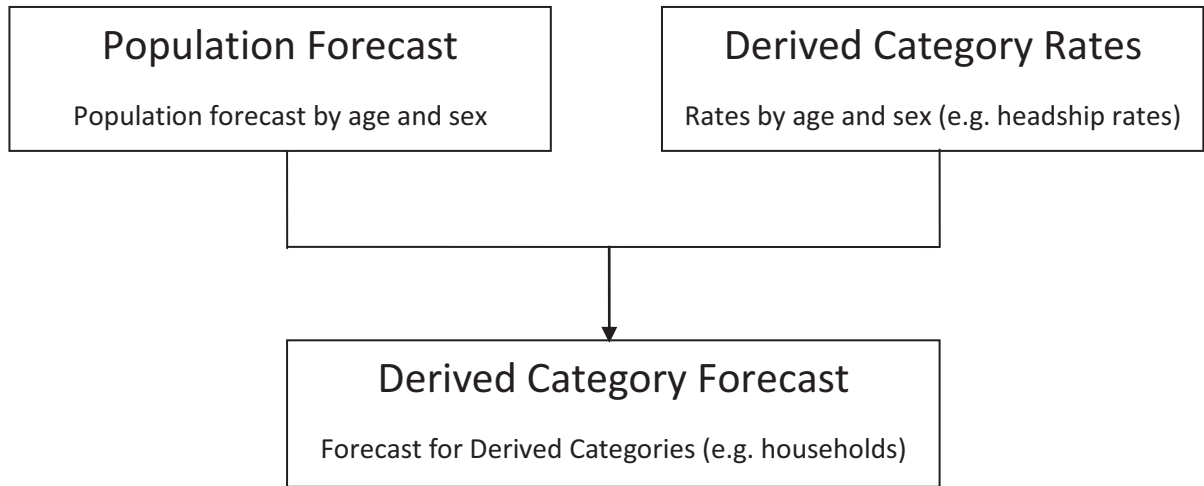


Figure 4: POPGROUP population projection methodology



Algebraically the model is defined as follows:

$$D_{a,s,u,y,d,g} = P_{a,s,u,y,g} * R_{a,s,u,y,d,g} / 100$$

Where:

D = Derived Category Forecast
 P = Population 'at risk' Forecast
 R = Derived Category Rates

and

a = age-group
 s = sex
 u = Sub-population
 y = year
 d = derived category
 g = group (usually an area, but can be an ethnic group or social group)

Figure 5: Derived Forecast Model: household projection methodology

3.3. Demographic data: district and sub-district inputs

The POPGROUP model draws data from a number of sources, building an historical picture of population, households, fertility, mortality and migration on which to base its scenario forecasts. Using the historical data evidence for 2001-2010, in conjunction with information from ONS national projections, a series of assumptions have been derived which drive the scenario forecasts.

Population

- Mid-2001 to mid-2010 population by single year of age and sex at district level
- Mid-2001 to mid-2010 population by five years of age and sex at sub-district level

Births and fertility

- Mid-year counts of births by sex, 2001 – 2010 for all areas
- Local birth statistics are combined with the ONS 2010-based standard fertility schedule to produce age-specific fertility rates for each district and sub-district
- The ‘trend’ in fertility for each year of the forecast follows that set by ONS in its national 2010-based population projection assumptions

Deaths and mortality

- Deaths by age and sex from 2001 – 2010
- Local death statistics are combined with the ONS 2010-based standard mortality schedule to produce age-specific mortality rates for each district and sub-district
- The ‘trend’ in mortality for each year of the forecast follows that set by ONS in its national 2010-based population projection assumptions

Migration

- At district level, internal migration data by age and sex are drawn from patient registration statistics (incorporating ONS’ improved handling of student flows). Future migration rates are derived from a five-year history (2006-2010)
- At district level, the latest release of ONS’ MYE provides the estimates of international migration on immigration and emigration flows. Future migration flows are derived from a five-year history (2006-2010)
- At sub-district level, no distinction is made between internal and international migration. Historical net migration at sub-district level is derived as the ‘residual’ of annual population

change after taking account of births and deaths. Future migration flows are derived from a five-year history (2006-2010)

Households

The household projection methodology used by POPGROUP's Derived Forecast model is that employed by CLG, applying headship rates by household type to population forecasts by age and sex. This produces a household forecast by household type, age and sex. Household forecasts for East Herts geographical areas have been made using data drawn from the latest CLG 2008-based projections as follows:

- Households by household type
- Population not in households
- Headship rates by household type, age and sex

The household types as defined by the CLG 2008 household projections and used by the Derived Forecast Model are as follows:

1. One person households: Male
2. One person households: Female
3. One family and no others: Couple: No dependent children
4. One family and no others: Couple: 1 dependent child
5. One family and no others: Couple: 2 dependent children
6. One family and no others: Couple: 3+ dependent children
7. One family and no others: Lone parent: 1 dependent child
8. One family and no others: Lone parent: 2 dependent children
9. One family and no others: Lone parent: 3+ dependent children
10. A couple and one or more other adults: No dependent children
11. A couple and one or more other adults: 1 dependent child
12. A couple and one or more other adults: 2 dependent children
13. A couple and one or more other adults: 3+ dependent children
14. A lone parent and one or more other adults: 1 dependent child
15. A lone parent and one or more other adults: 2 dependent children
16. A lone parent and one or more other adults: 3+ dependent children
17. Other households

Dwellings

The Derived Forecast model uses a 'vacancy rate' to convert households into dwellings. These vacancy rates have been derived from 2001 Census data and are maintained at a constant level in the scenario forecasts.

4. Historical Analysis

4.1. Population change East Herts, 2001-2010

As a precursor to the presentation of the trend forecasts, this section illustrates how the population of East Herts has changed over the last decade; for the district in total and for the individual Parish Grouping and Town. The district profile of change is illustrated here (Figure 6 a&b) with subsequent Parish Grouping and Town illustrations following the same format and colour scheme. Red bars illustrate population growth (Figure 6a); green and purple bars illustrate how natural change and net migration respectively have driven this population growth (Figure 6b).

Since 2001, the population of East Herts has increased by 6.6%, from 129k in census year to 137.7k in 2010 (Figure 6a). Since 2001, natural change (births minus deaths) has made a consistent contribution to population growth (+500-650 per year). Net migration (combining internal and international flows) has been more variable, with the highest net inflows experienced since 2006 (Figure 6b). Where there has been a *negative* impact of one of the components of population change (net migration in 2002/03 and 2003/2004) this indicates that migration *out of* East Herts has exceeded migration *into* the district. In these years, natural change has compensated for the net migration loss, contributing to an overall population increase.

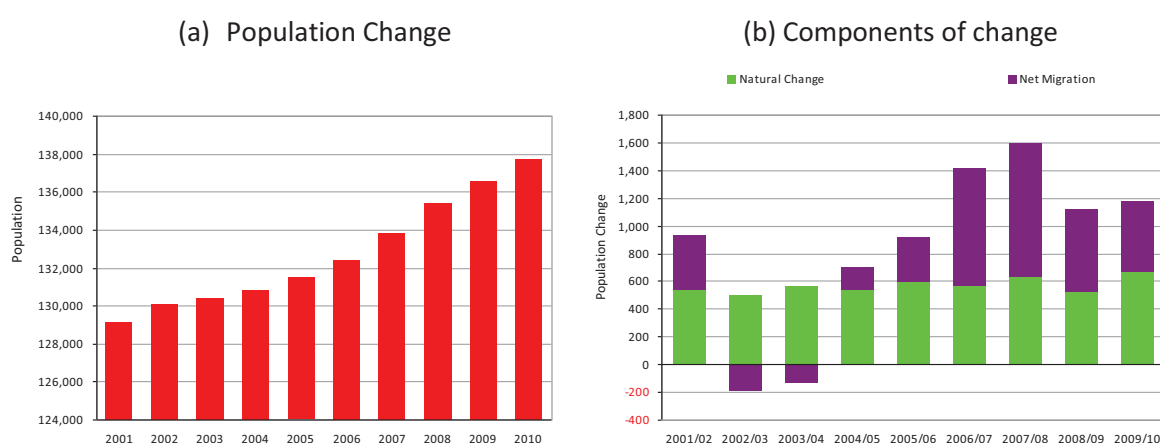


Figure 6: Population change & components of change, East Herts 2001-2010

The following sections provide similar illustrations of population change for each Parish Grouping and Town. These historical patterns and trends are the basis from which the 'trend' scenarios have been defined in section 5 of this analysis.

4.2. Population change by Parish Grouping, 2001-2010

The historical analysis of population change by Parish Grouping, for the years 2001-2010, is presented as follows:

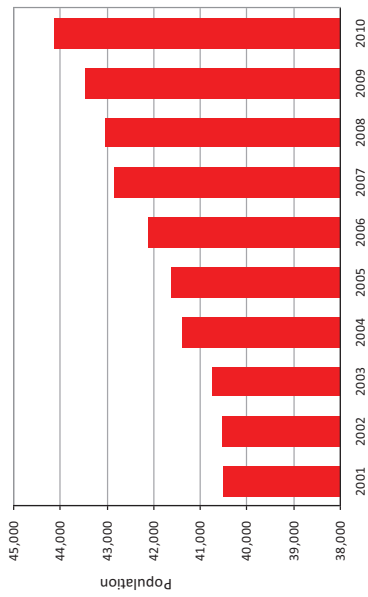
For each Parish Grouping, individual charts provide an illustration of:

- Total Population Change, 2001-2010 (Figure 7)
- The 'components' of Population Change, 2001-2010 (Figure 8)

Differences between Parish Grouping areas are displayed through comparison of:

- Total Population Change, 2001-2010 (Figure 9)
- Net Migration (immigration less outmigration), 2001-2010 (Figure 10)
- Natural Change (births less deaths), 2001-2010 (Figure 11)

Bishop's Stortford and Northeastern



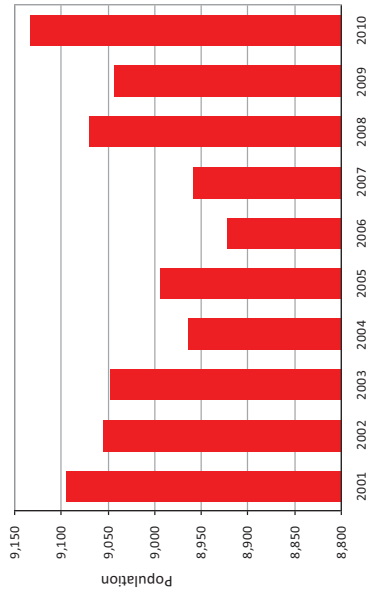
Buntingford and Central Northern



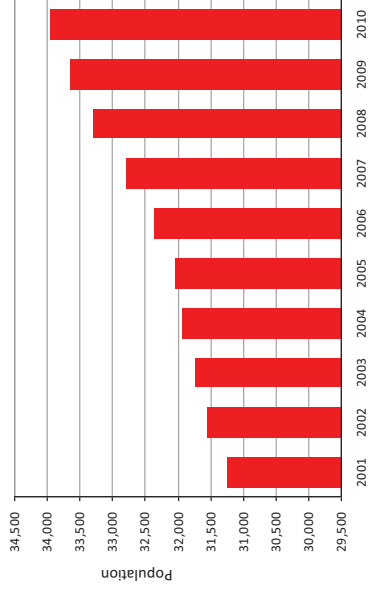
Hertford and Central Southwestern



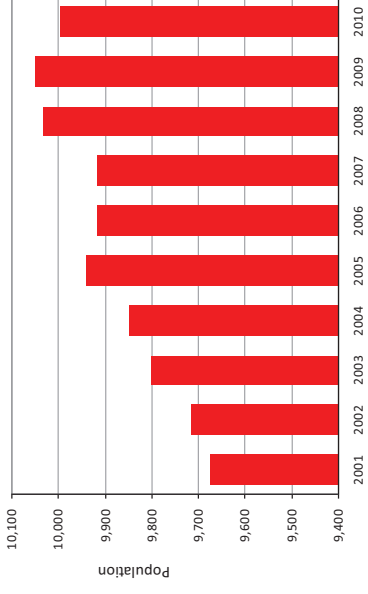
Sawbridgeworth and Southeastern



Ware and Central Southern

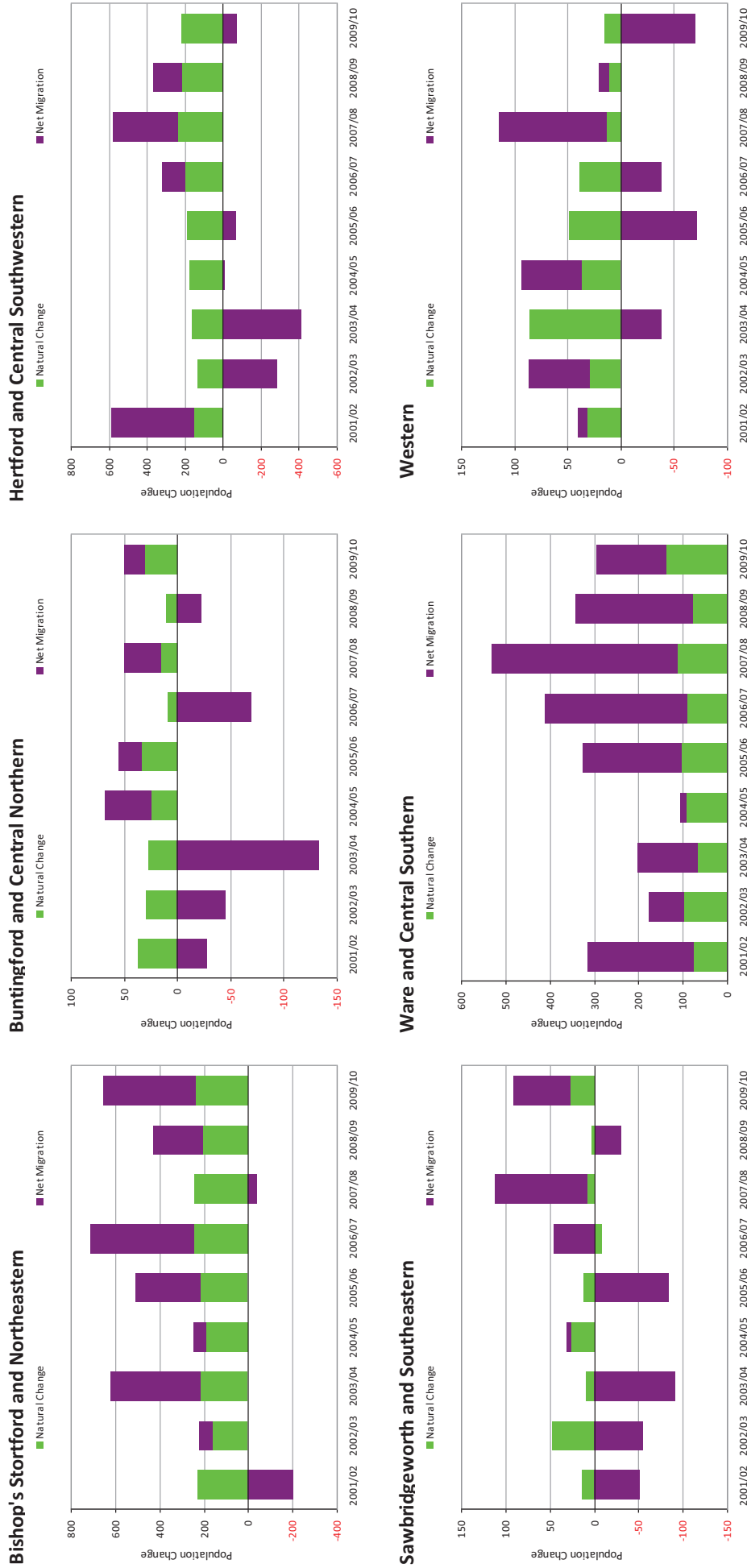


Western



Note: The values on the vertical axis change for each area, to emphasise change over time

Figure 7: Population change by Parish grouping, 2001-2010



Note: The values on the vertical axis change for each area, to emphasise change over time

Figure 8: Components of population change by Parish Grouping, 2001-2010

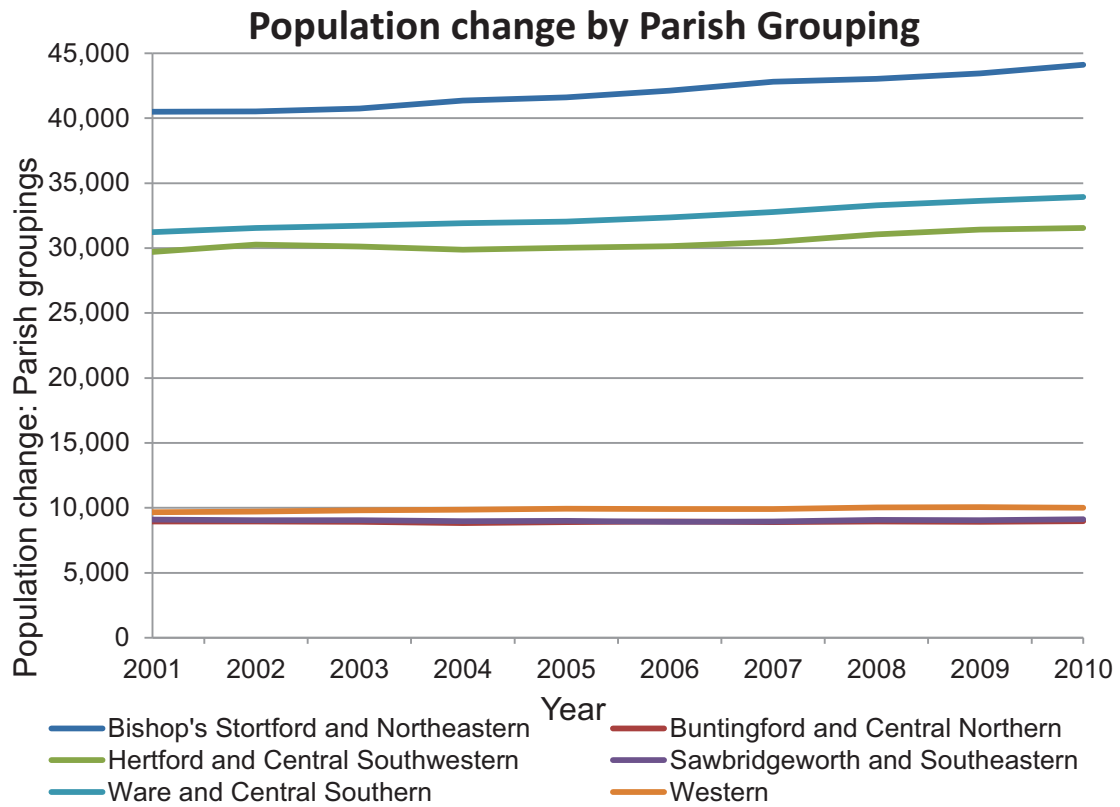


Figure 9: Population change by Parish Grouping, 2001-2010

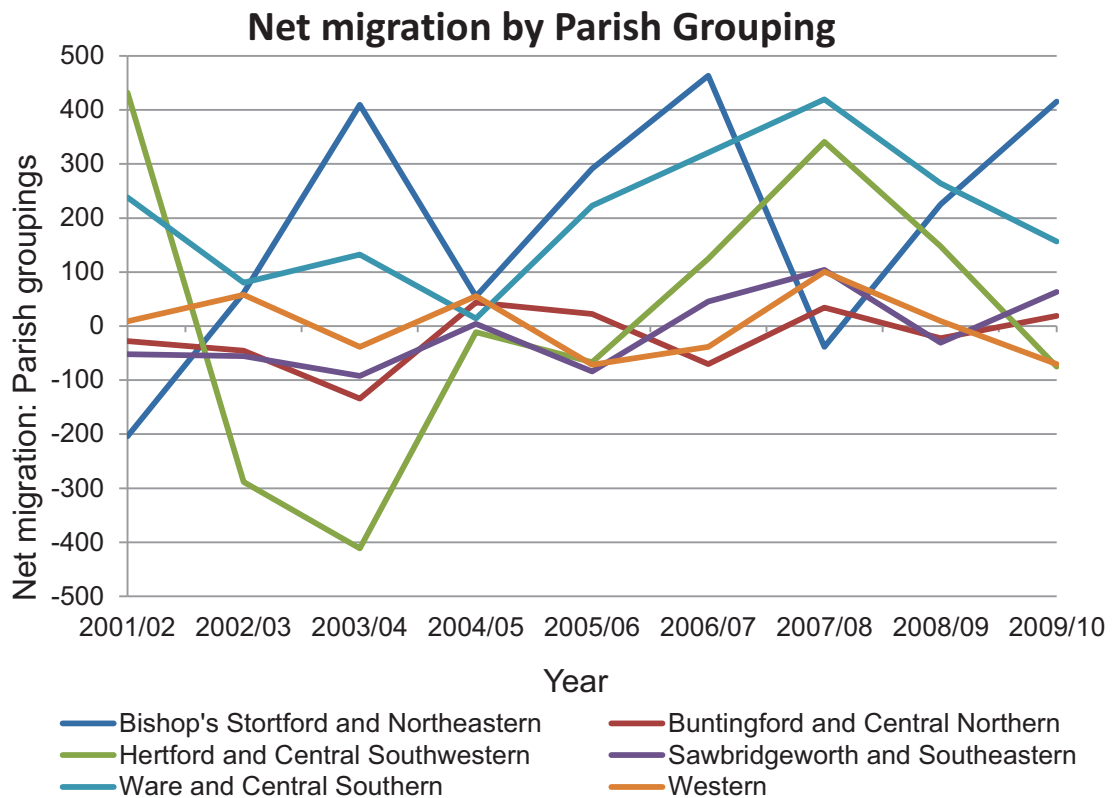


Figure 10: Net migration by Parish Grouping, 2001/2-2009/10

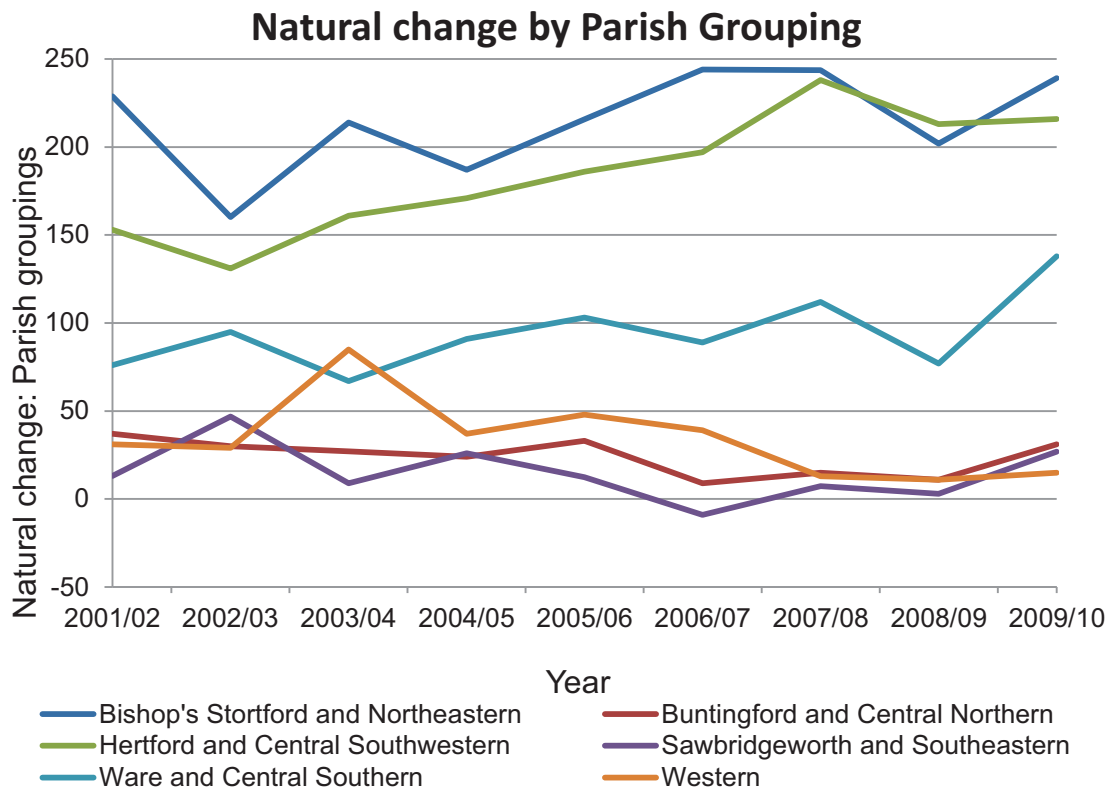


Figure 11: Natural change by Parish Grouping, 2001/2-2009/10

4.3. Population change by Town, 2001-2010

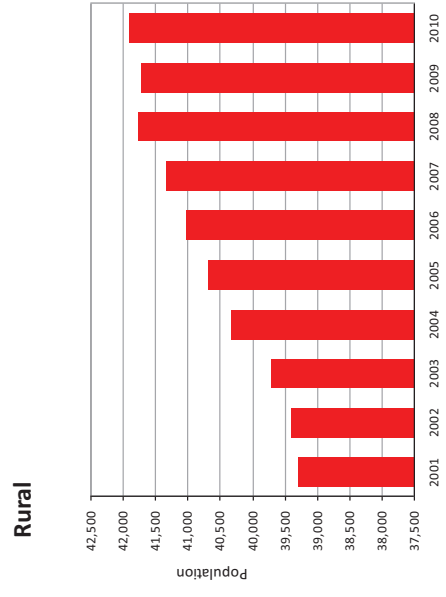
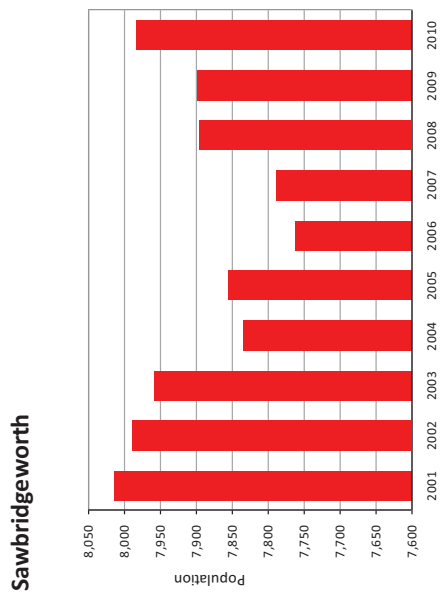
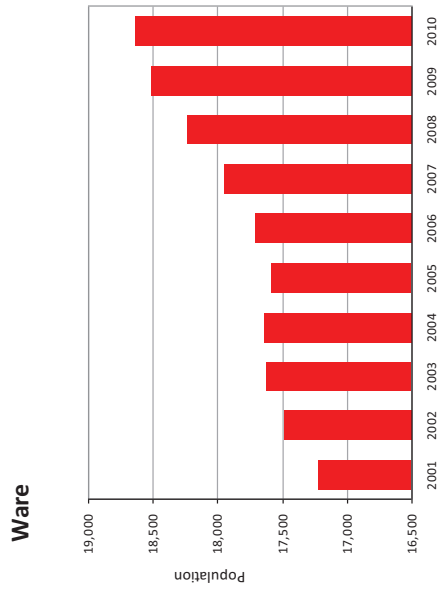
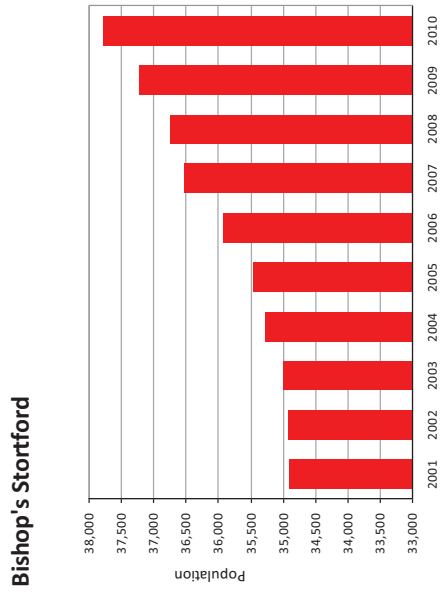
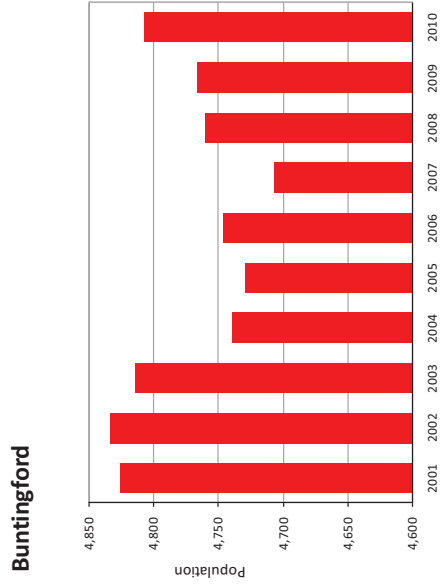
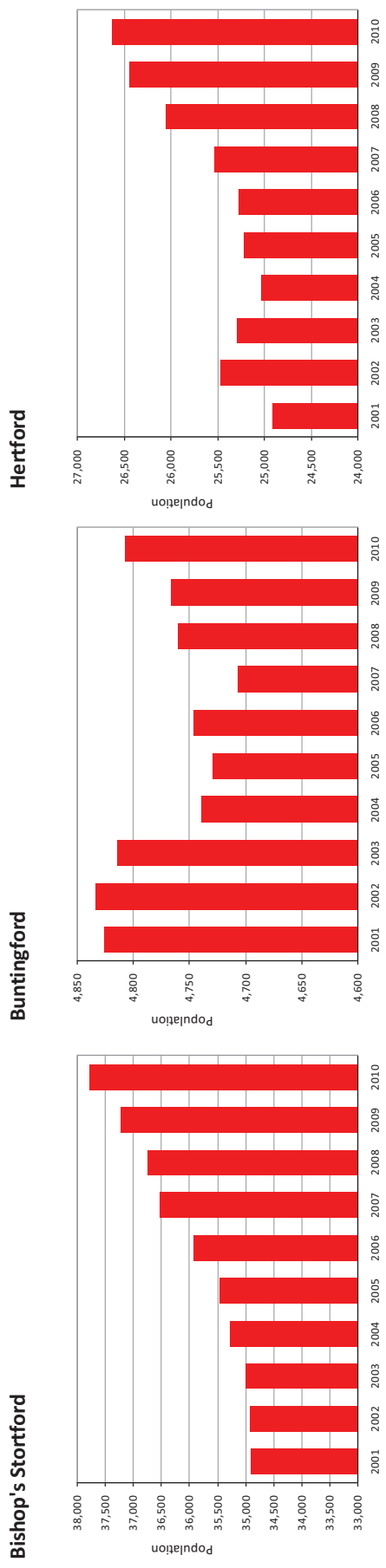
The historical analysis of population change by Town, for the years 2001-2010, is presented as follows:

For each Town, individual charts provide an illustration of:

- Total Population Change, 2001-2010 (Figure 12)
- The 'components' of Population Change, 2001-2010 (Figure 13)

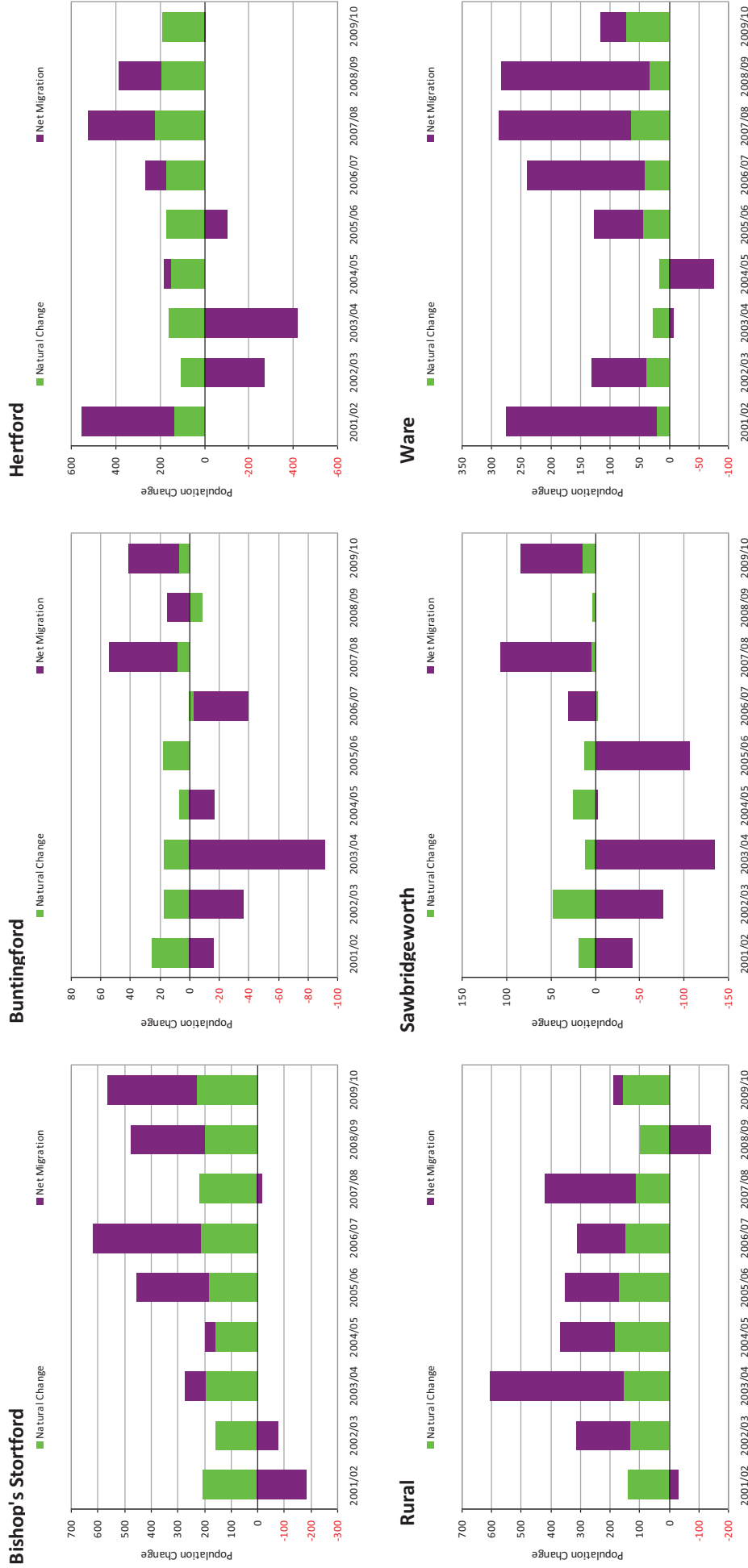
Differences between Towns are displayed through comparison of:

- Total Population Change, 2001-2010 (Figure 14)
- Net Migration (immigration less outmigration), 2001-2010 (Figure 15)
- Natural Change (births less deaths), 2001-2010 (Figure 16)



Note: The values on the vertical axis change for each area, to emphasise change over time

Figure 12: Population change by Town, 2001-2010



Note: The values on the vertical axis change for each area, to emphasise change over time

Figure 13: Components of population change by Town, 2001/2-2009/10

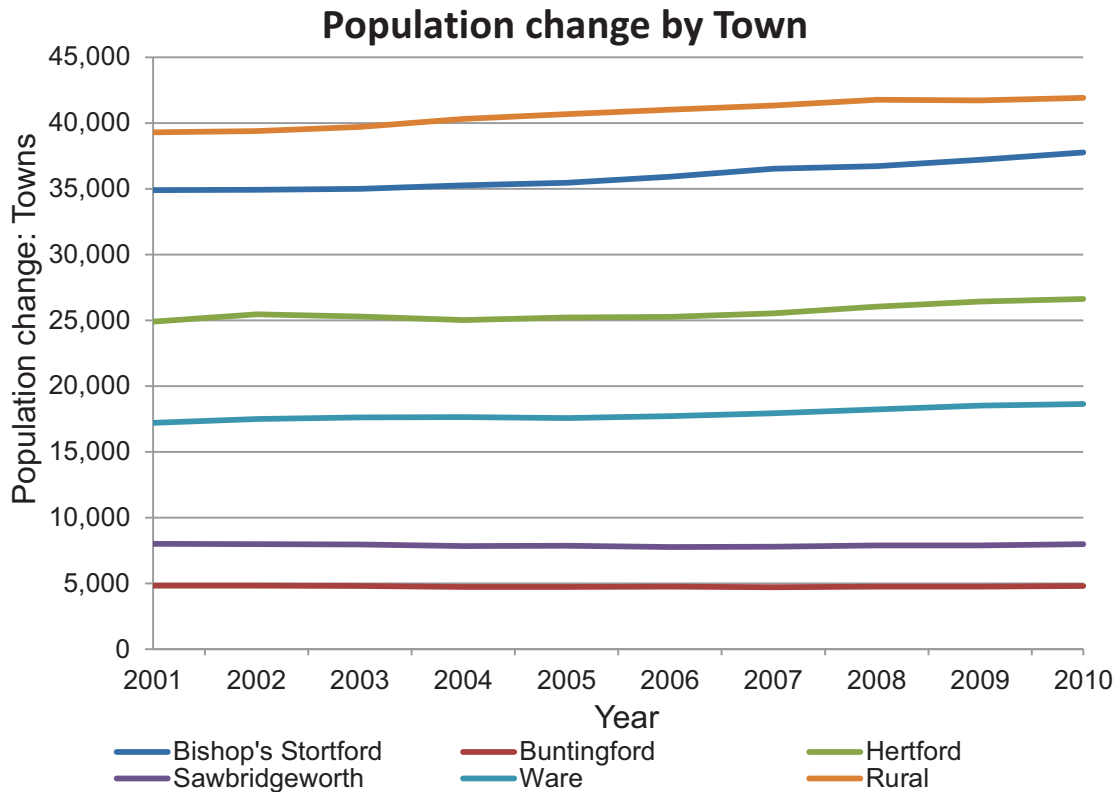


Figure 14: Population change by Town, 2001-2010

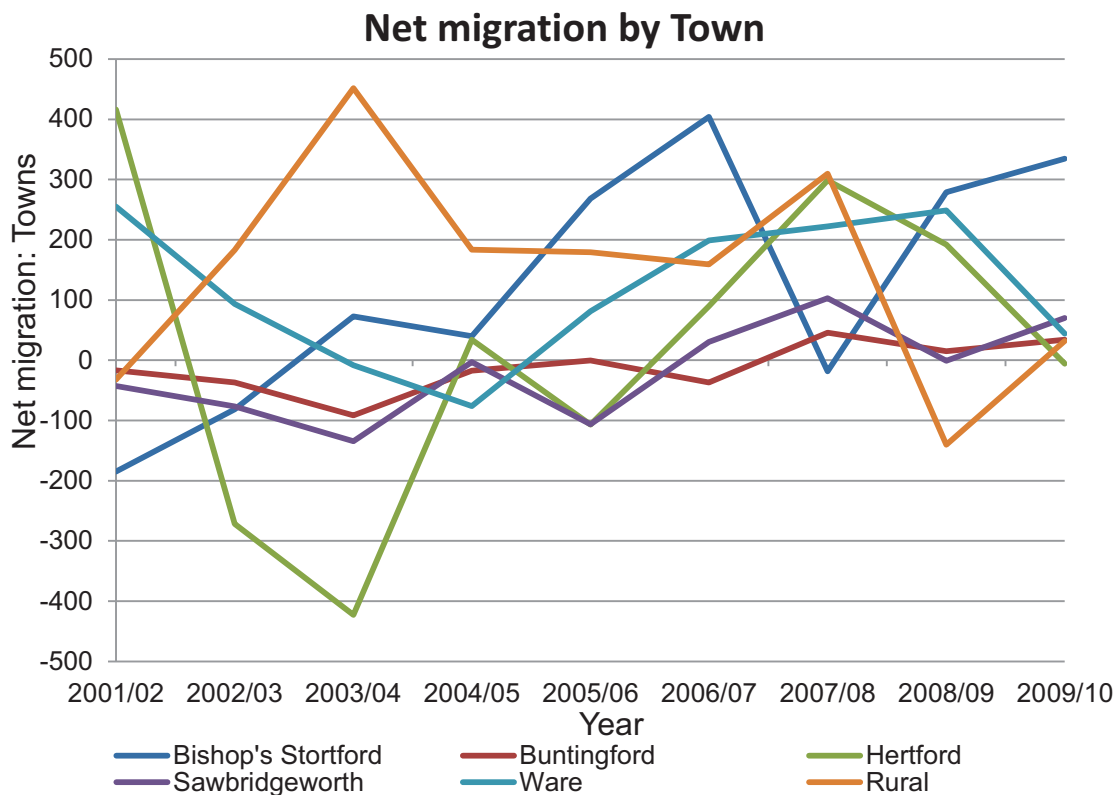


Figure 15: Net migration by Town, 2001/2-2009/10

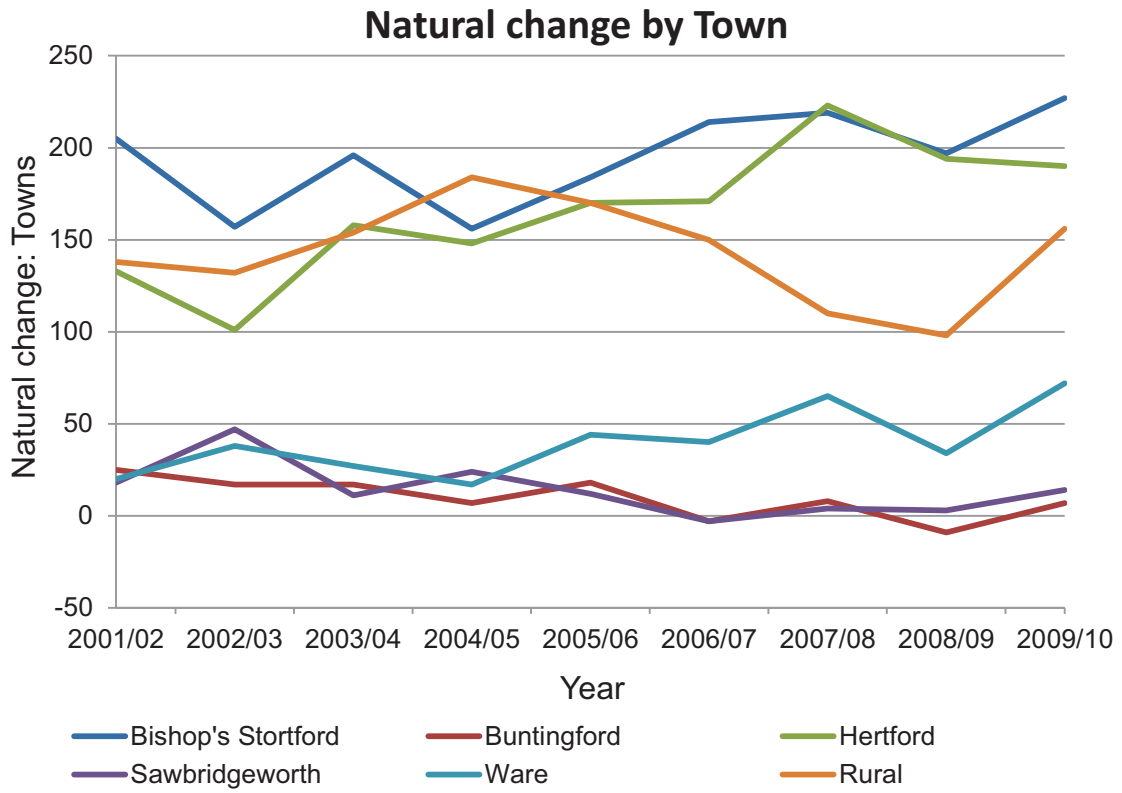
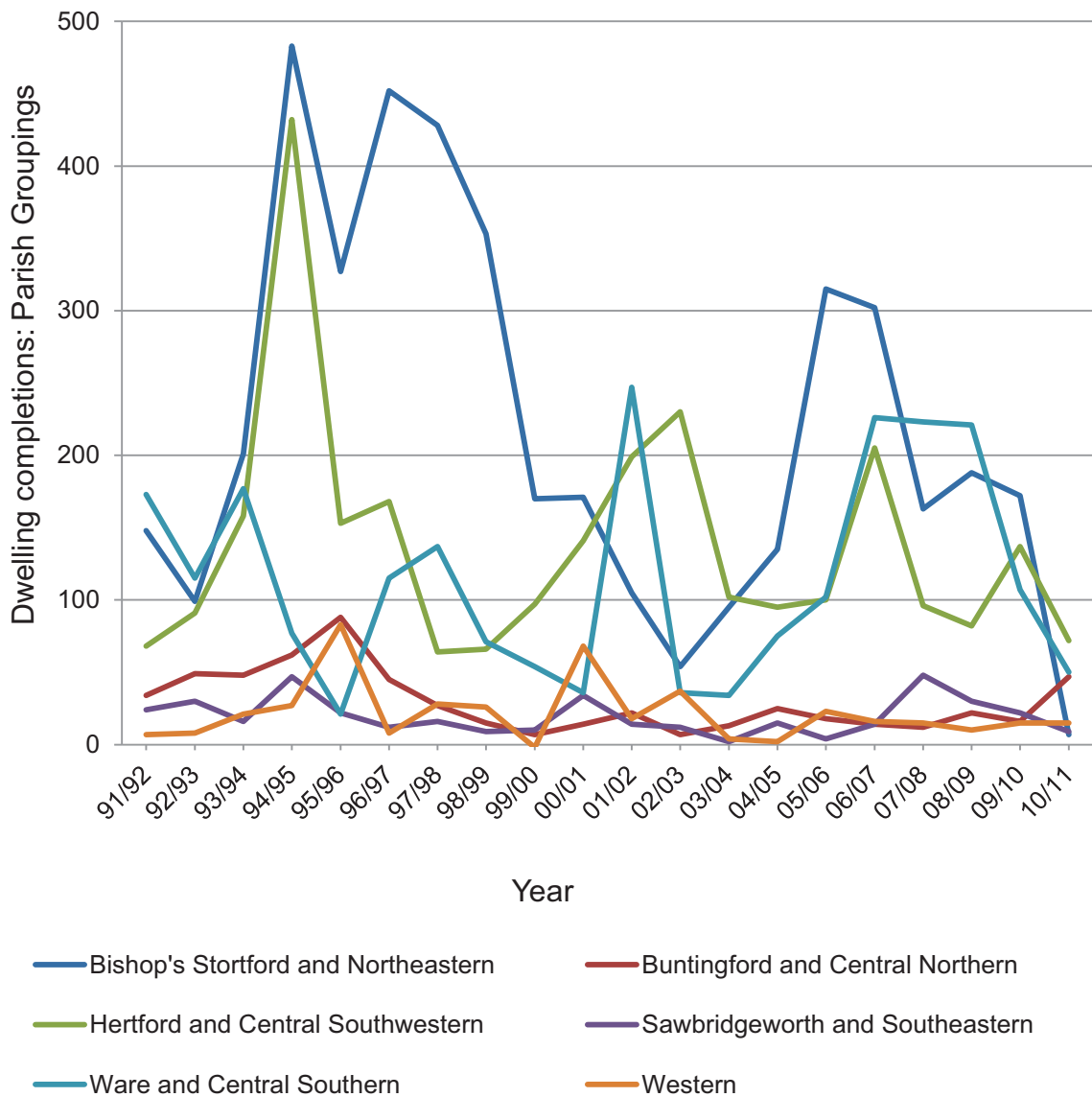


Figure 16: Natural change by Town, 2001/2-2009/10

4.4. Dwelling completions

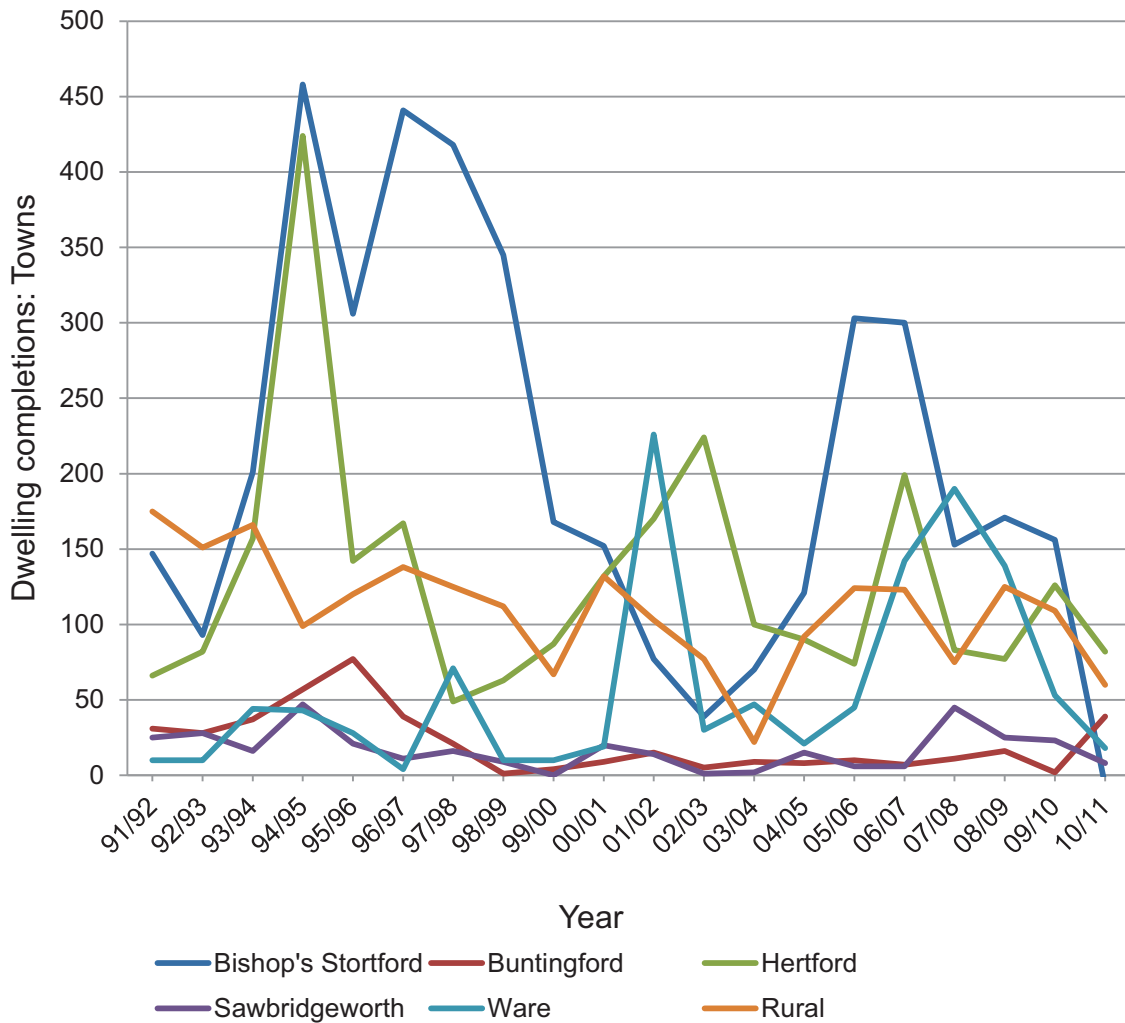
Completion rate histories were provided for each of the defined Parish Groupings and Towns. This data relates to an extended period, 1991/2 to 2010/11. The charts and tables below (Figures 17 & 18) illustrate how these completion rates have varied year-on-year, indicating a 20-year average, a 10-year average and the 'maximum' completion rate achieved over the full time-series.

The 10-year average (2002-2011) has been used to derive a dwelling-led scenario which constrains population and household growth to this annual total of new housing growth. So, for example, the 'Bishop's Stortford and Northeastern' area has been constrained to an annual average dwelling growth of 154 units over the 2010-2033 projection period. Results from this scenario (CR 10 Yr) are compared against the alternative trend scenarios in section 5.



Parish grouping	Completions 1992-2001	Completions 2002-2011	Total completions	Annual average 1992-2011	Annual average 2002-2011	Maximum
Bishop's Stortford and Northeastern	2,832	1,536	4,368	218	154	483
Buntingford and Central Northern	389	196	585	29	20	88
Hertford and Central Southwestern	1,438	1,318	2,756	138	132	432
Sawbridgeworth and Southeastern	220	170	390	20	17	48
Ware and Central Southern	976	1,321	2,297	115	132	247
Western	274	155	429	21	16	83

Figure 17: Completion Rate histories for Parish Groupings in East Herts



Town	Completions 1992-2001	Completions 2002-2011	Total completions	Annual average 1992-2011	Annual average 2002-2011	Maximum
Bishop's Stortford	2,729	1,383	4,112	206	138	458
Buntingford	304	122	426	21	12	77
Hertford	1,369	1,225	2,594	130	123	424
Rural	1,285	910	2,195	110	91	175
Sawbridgeworth	193	145	338	17	15	47
Ware	249	911	1,160	58	91	226

Figure 18: Completion Rate histories for Towns in East Herts

5. Trend forecasts and completion-rate forecasts – Phase 1

5.1. Scenario definition

This first phase of scenario development presents a number of ‘trend’ scenarios, using historical evidence to calibrate long-term forecasts of demographic change. These trend scenarios are compared against an initial ‘dwelling-led’ scenario, which uses information on historical completion rates to evaluate an alternative trajectory of growth. These scenarios are designed to provide a basis from which alternative dwelling-led scenarios can be developed using information on local housing targets.

The following scenarios are presented for each of the defined Parish Grouping and Town geographies, in each case using a 2010-2033 forecast period.

Migration-led

This scenario uses a 5-year historical average (2006-2010) as the basis for the derivation of its long-term migration assumptions. These data are taken from the components-of-change evident in ONS’ latest revisions to mid-year estimates (November 2011). Mortality and fertility differentials are defined for each area and the long-term trend in mortality and fertility are consistent with the ONS trend.

SNPP 2010

The SNPP 2010 scenario uses the latest 2010-based ONS sub-national population projection for East Herts as a ‘constraint’, using the assumptions defined in the Migration-led scenario but replicating the ONS ‘district’ total in each year of the forecast period.

Natural Change

The Natural Change scenario is constrained by zero net migration, with only births and deaths driving population change over the 2010-2033 forecast period. Mortality and fertility differentials are defined for each area and the long-term trend in mortality and fertility are consistent with the ONS trend.

Net-Nil Migration

This scenario assumes that the ‘net’ impact of migration is zero throughout the projection period (this does not necessarily mean zero migration). The scenario assumes that in and out-migration continues but the overall balance between the figures is zero. Fertility and mortality assumptions for this scenario remain consistent with the Migration-led scenario.

CR-10 yr

This initial dwelling-led scenario is based on a 10-year average of completion rates (CR) over the period 2002-11. These average completion rates are added as a 'constraint' to the trend forecast, with annual population and household growth in each area determined by the number of new dwellings added each year. In and out migration is used to balance population totals against available dwellings.

5.2. Scenario notes

i. Consistency with wider EPOA study

This East Herts study has been completed within the context of a wider study commissioned by the Essex Planning Officers Association (EPOA). The latest demographic information has been used; consistent with Phase 3 of the EPOA study completed in July 2012. This includes updated fertility and mortality assumptions from ONS and updated mid-year population estimates 2006-2010 that were released by ONS at the end of 2011. The East Herts study is one step ahead of the Phase 2 EPOA study at this stage (end of April 2012).

A Phase 4 EPOA study is planned for October-December 2012, to include an assessment of new evidence from the 2011 Census, 2011 mid-year population estimates and 'interim' 2011-based population projections for 2011-20.

ii. Consistency between Parish Grouping and Town Forecasts

Although identical scenarios have been run for the Parish Grouping and Town sub-district areas, there may be differences in the aggregate, district-level impacts that result from each. These differences are not significant and are a result of the POPGROUP model's handling of migration within the individual areas, which may sum to slightly different district totals.

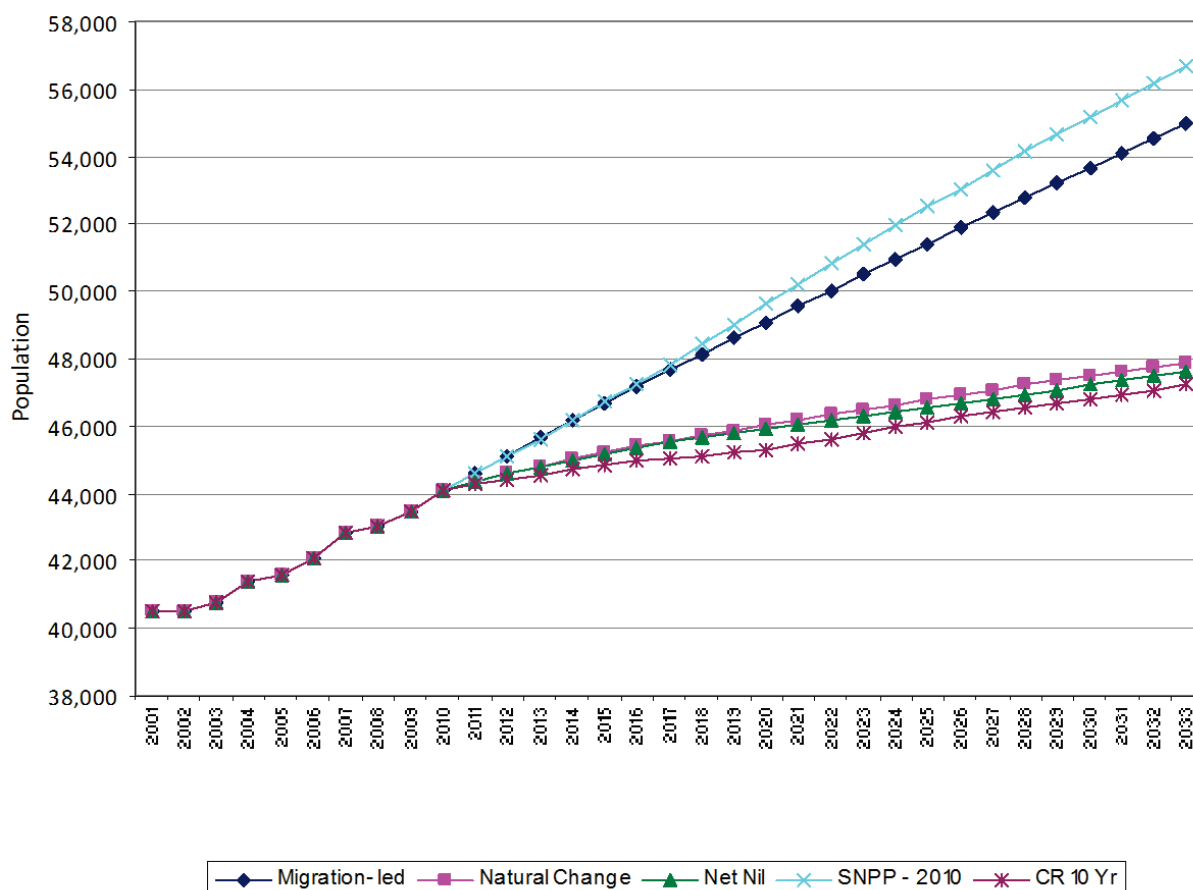
iii. Economic scenario

In the wider Phase 2/3 EPOA study, the 'jobs' impact of different scenarios has been evaluated using a combination of district-level economic activity rates, unemployment rates and commuting ratios. At sub-district level these 'jobs' impacts are not reproduced as the key 'commuting' ratios are only defined at the more aggregate, district level.

5.3. Parish Grouping forecasts

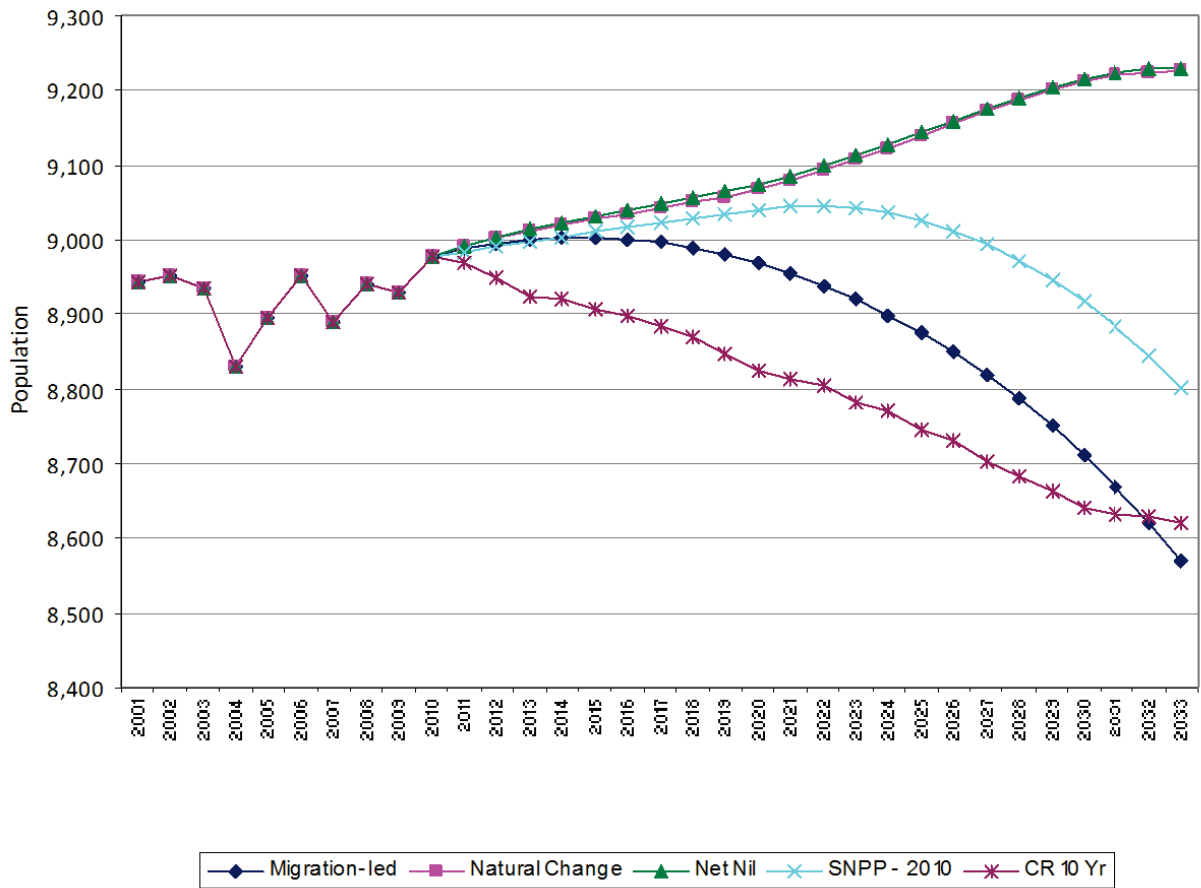
In the following illustrations, scenarios are 'ranked' in descending order of estimated population growth.

Bishop's Stortford and Northeastern



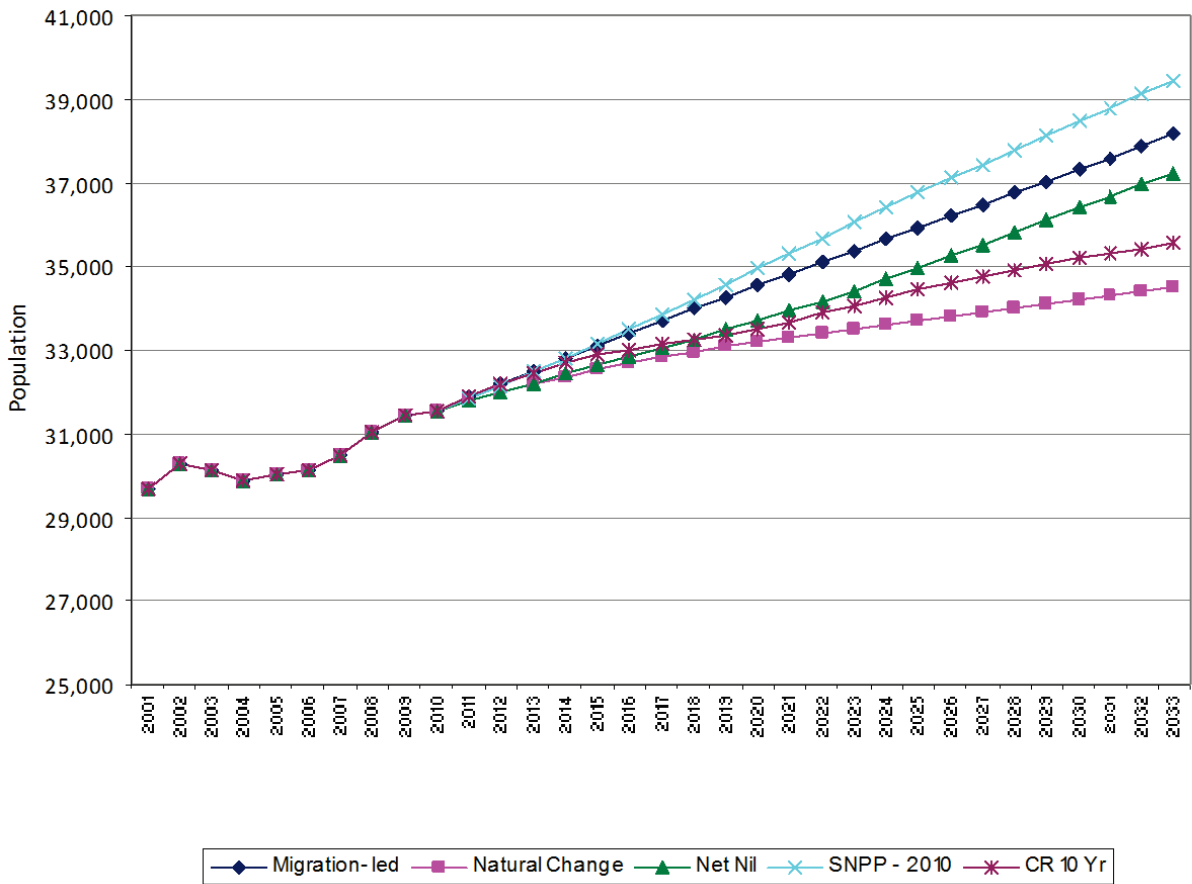
Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	12,585	28.5%	7,505	40.6%	334	334
Migration-led	10,897	24.7%	6,784	36.7%	272	302
Natural Change	3,735	8.5%	3,973	21.5%	0	177
Net Nil	3,493	7.9%	2,692	14.6%	0	120
CR 10 Yr	3,129	7.1%	3,447	18.7%	-11	154

Buntingford and Central Northern



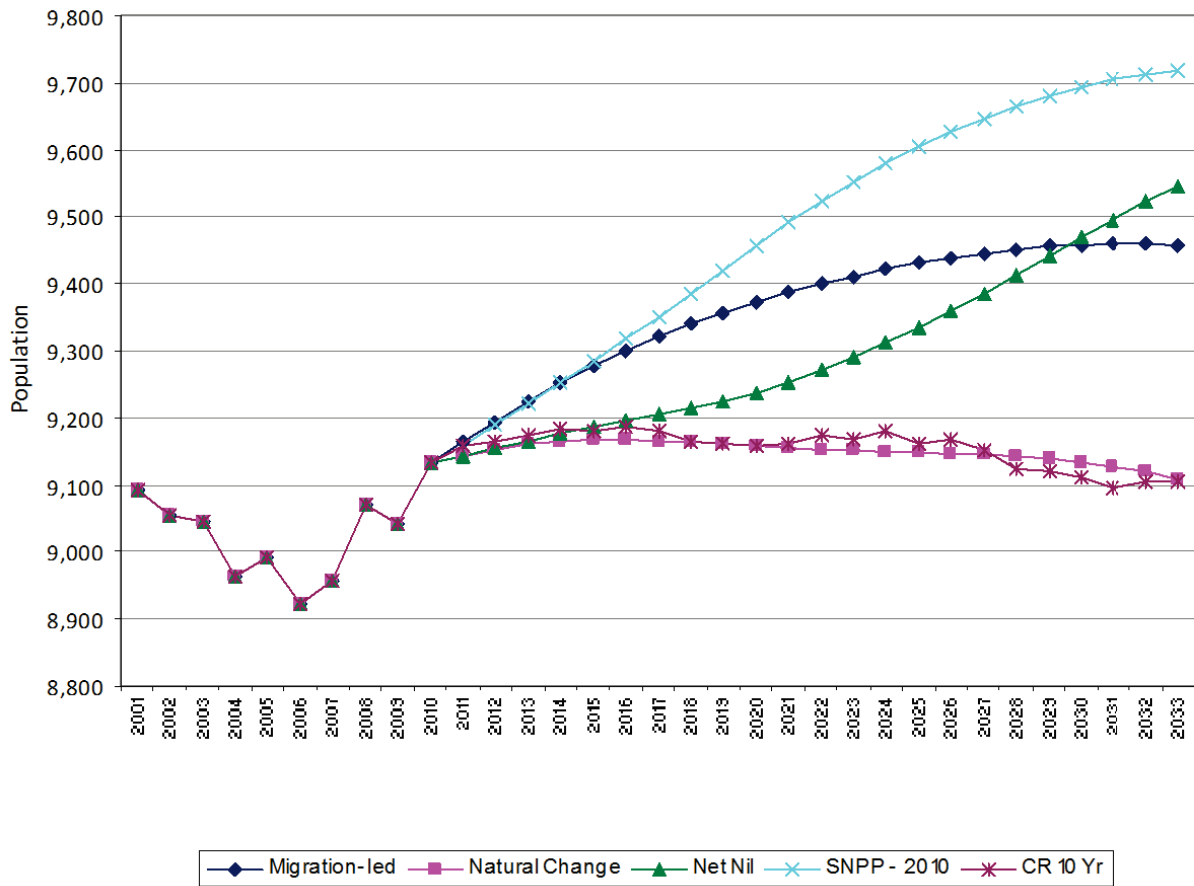
Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
Net Nil	250	2.8%	463	12.4%	0	20
Natural Change	248	2.8%	457	12.2%	0	20
SNPP - 2010	-176	-2.0%	516	13.8%	5	23
CR 10 Yr	-357	-4.0%	444	11.9%	0	20
Migration-led	-407	-4.5%	423	11.3%	-3	19

Hertford and Central Southwestern



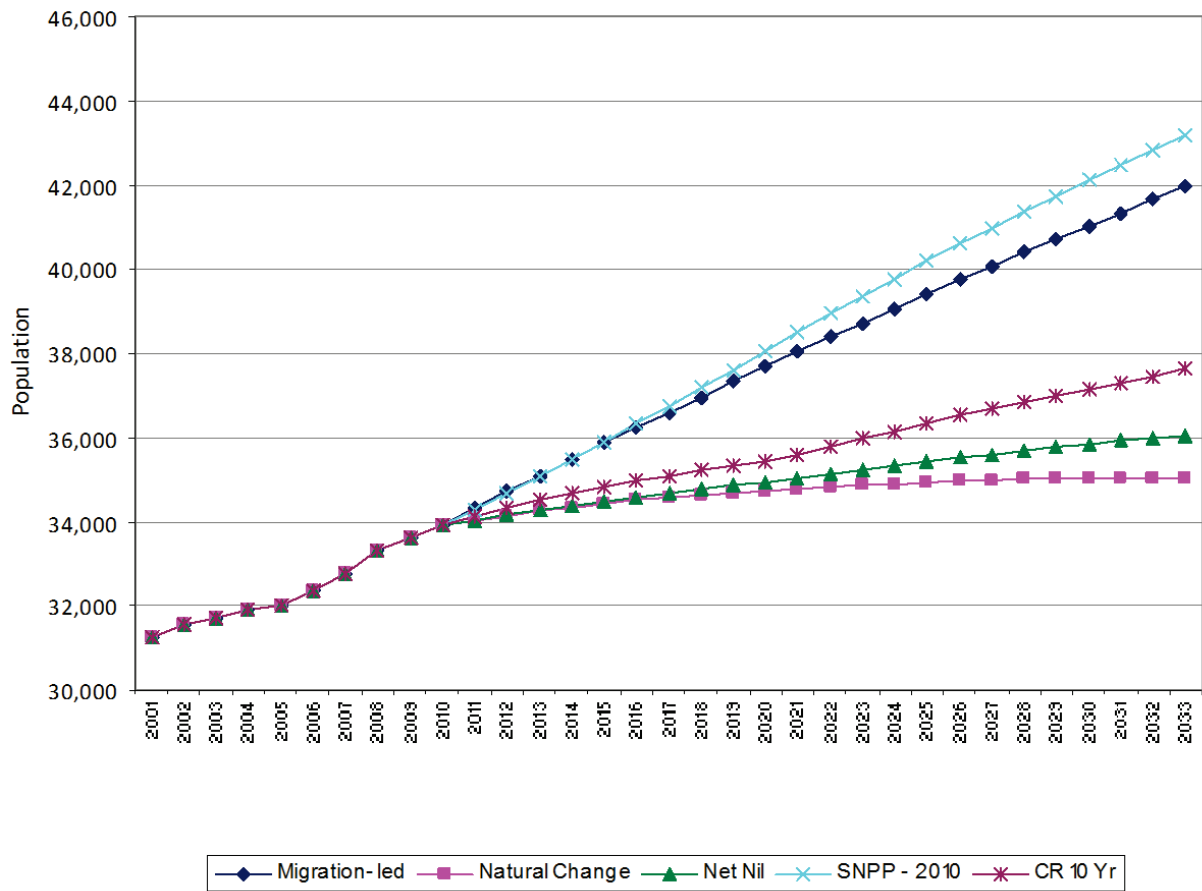
Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	7,895	25.0%	4,607	33.4%	140	205
Migration-led	6,605	20.9%	4,060	29.4%	94	181
Net Nil	5,692	18.0%	2,682	19.4%	0	119
CR 10 Yr	4,005	12.7%	2,959	21.5%	1	132
Natural Change	2,952	9.4%	2,683	19.5%	0	119

Sawbridgeworth and Southeastern



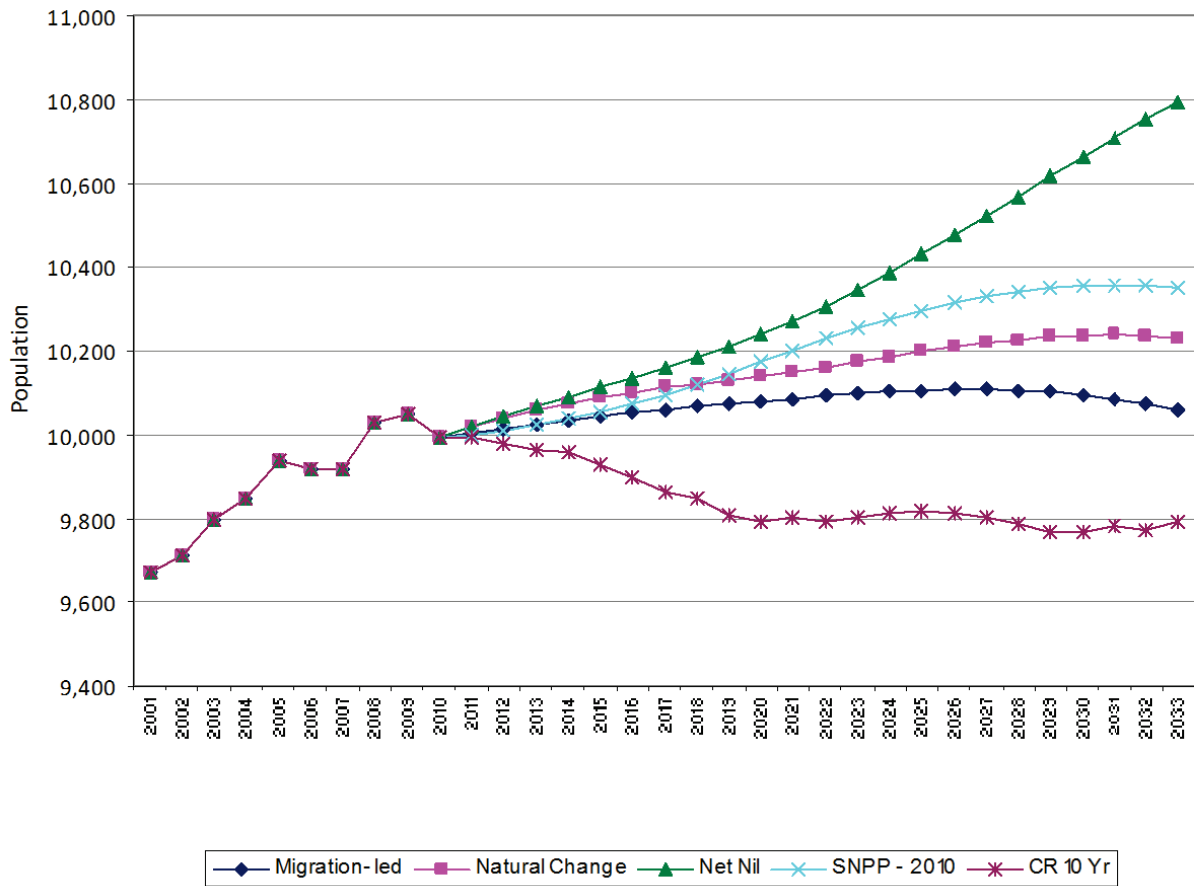
Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	587	6.4%	649	16.0%	30	29
Net Nil	413	4.5%	325	8.0%	0	14
Migration-led	325	3.6%	536	13.2%	20	24
Natural Change	-25	-0.3%	341	8.4%	0	15
CR 10 Yr	-28	-0.3%	381	9.4%	7	17

Ware and Central Southern



Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	9,227	27.2%	5,342	36.7%	321	237
Migration-led	8,018	23.6%	4,824	33.1%	277	214
CR 10 Yr	3,711	10.9%	2,973	20.4%	121	132
Net Nil	2,086	6.1%	1,955	13.4%	0	87
Natural Change	1,107	3.3%	1,606	11.0%	0	71

Western

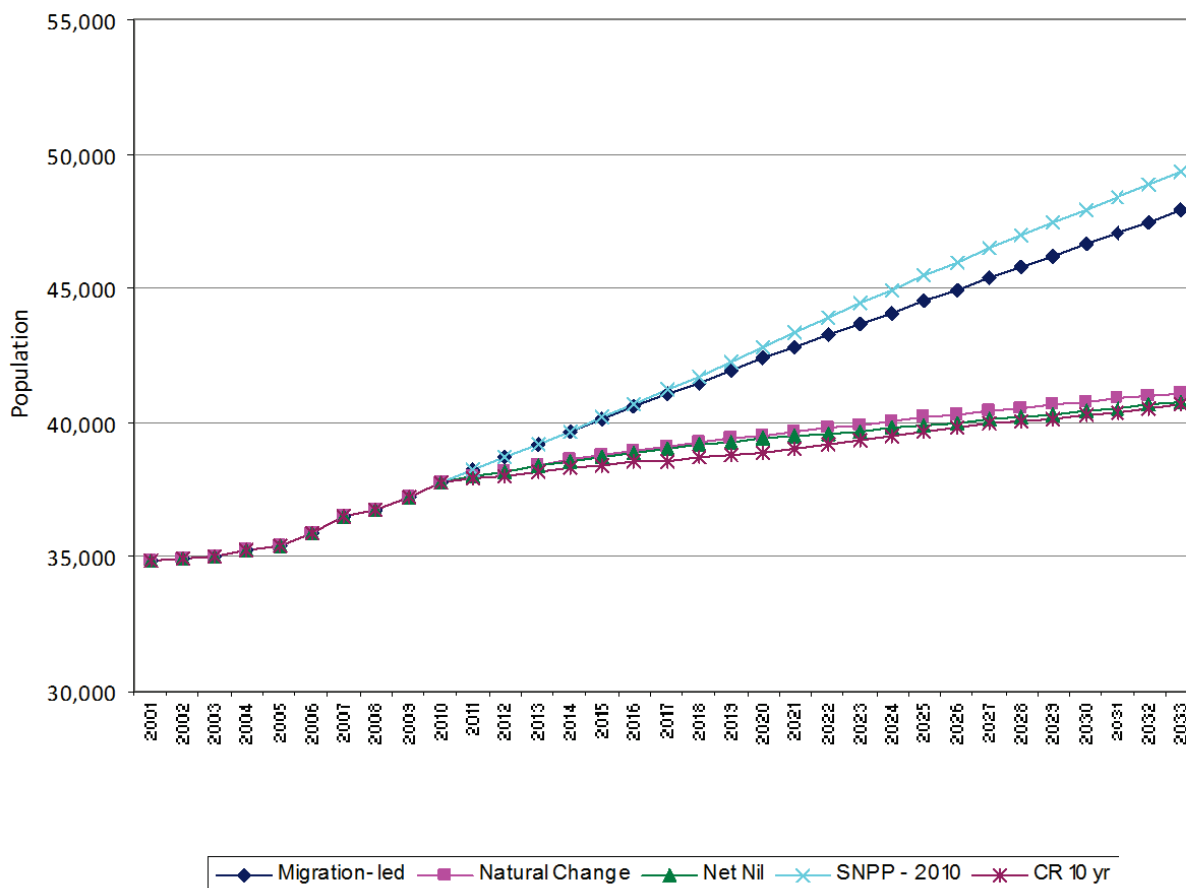


Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
Net Nil	799	8.0%	610	14.6%	0	27
SNPP - 2010	354	3.5%	579	13.9%	-3	26
Natural Change	234	2.3%	495	11.8%	0	22
Migration-led	62	0.6%	458	11.0%	-14	20
CR 10 Yr	-201	-2.0%	348	8.3%	-23	16

5.4. Town forecasts

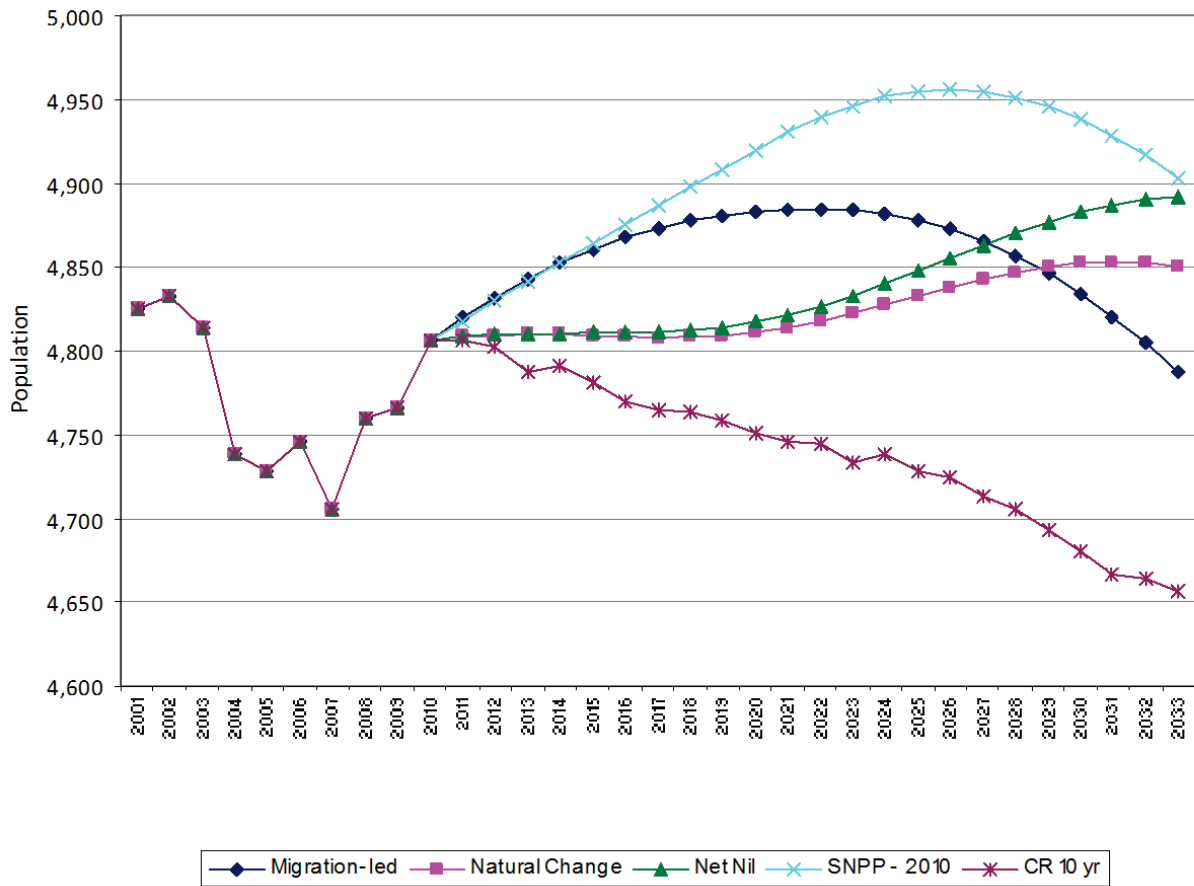
In the following illustrations, scenarios are 'ranked' in descending order of estimated population growth.

Bishop's Stortford



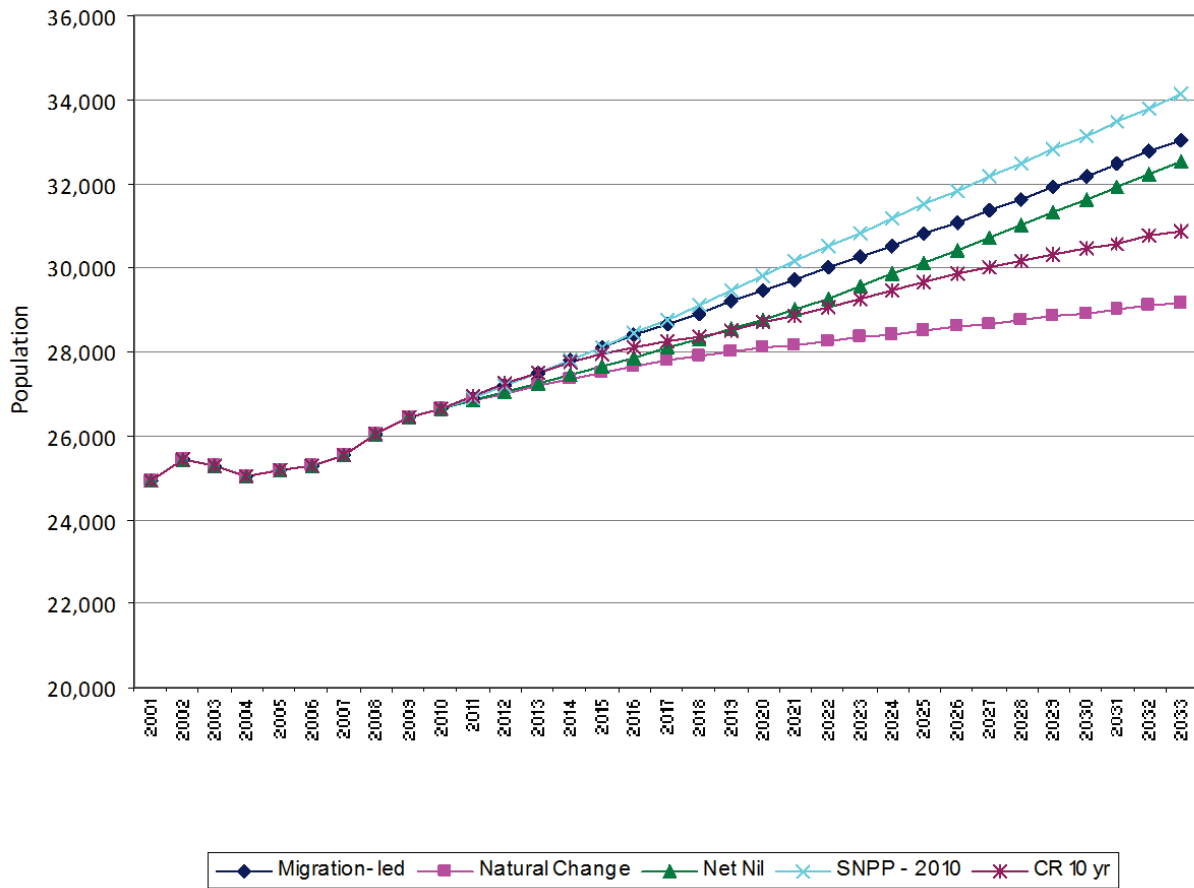
Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	11,558	30.6%	6,894	43.1%	307	307
Migration-led	10,120	26.8%	6,268	39.1%	253	279
Natural Change	3,336	8.8%	3,570	22.3%	0	159
Net Nil	2,993	7.9%	2,314	14.5%	0	103
CR 10 yr	2,910	7.7%	3,110	19.4%	-8	138

Buntingford



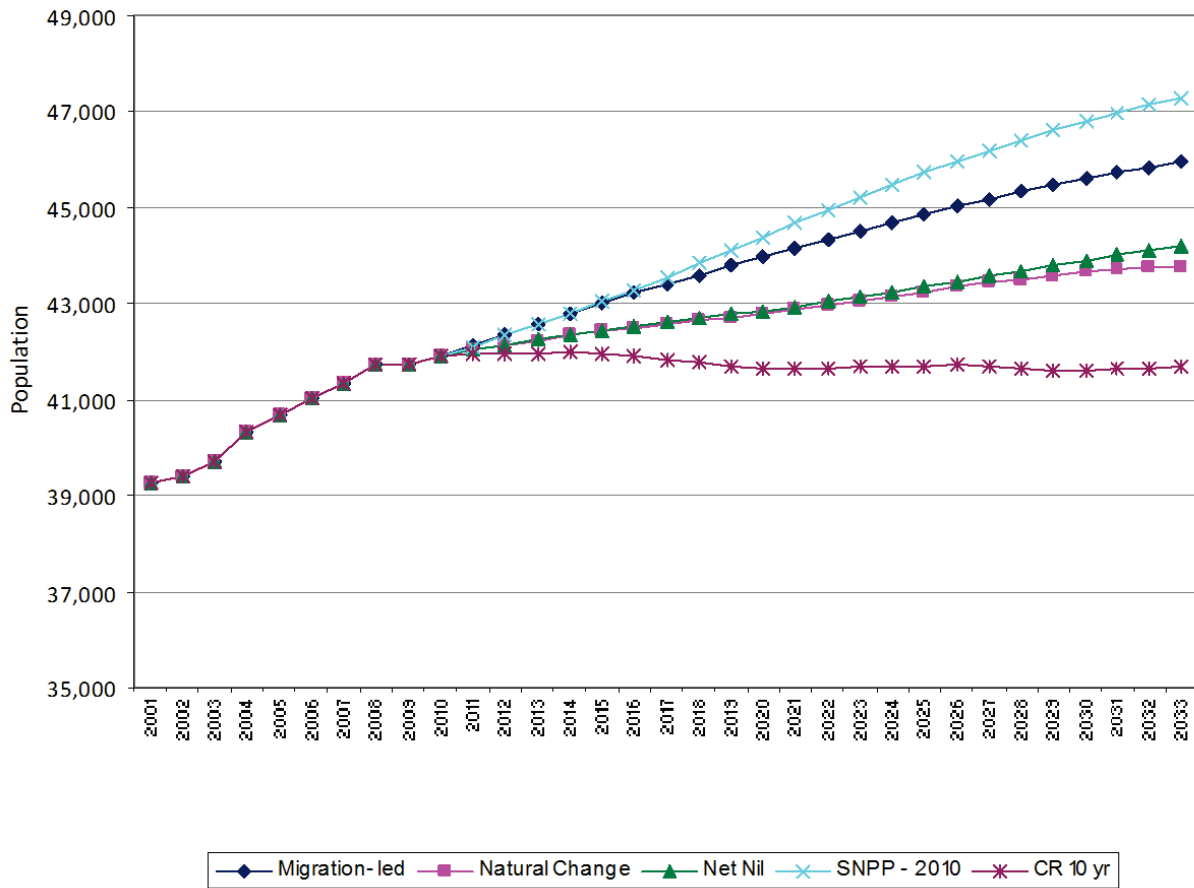
Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	96	2.0%	382	18.9%	16	17
Net Nil	86	1.8%	244	12.1%	0	11
Natural Change	44	0.9%	249	12.3%	0	11
Migration-led	-20	-0.4%	333	16.5%	11	15
CR 10 yr	-150	-3.1%	278	13.8%	7	12

Hertford



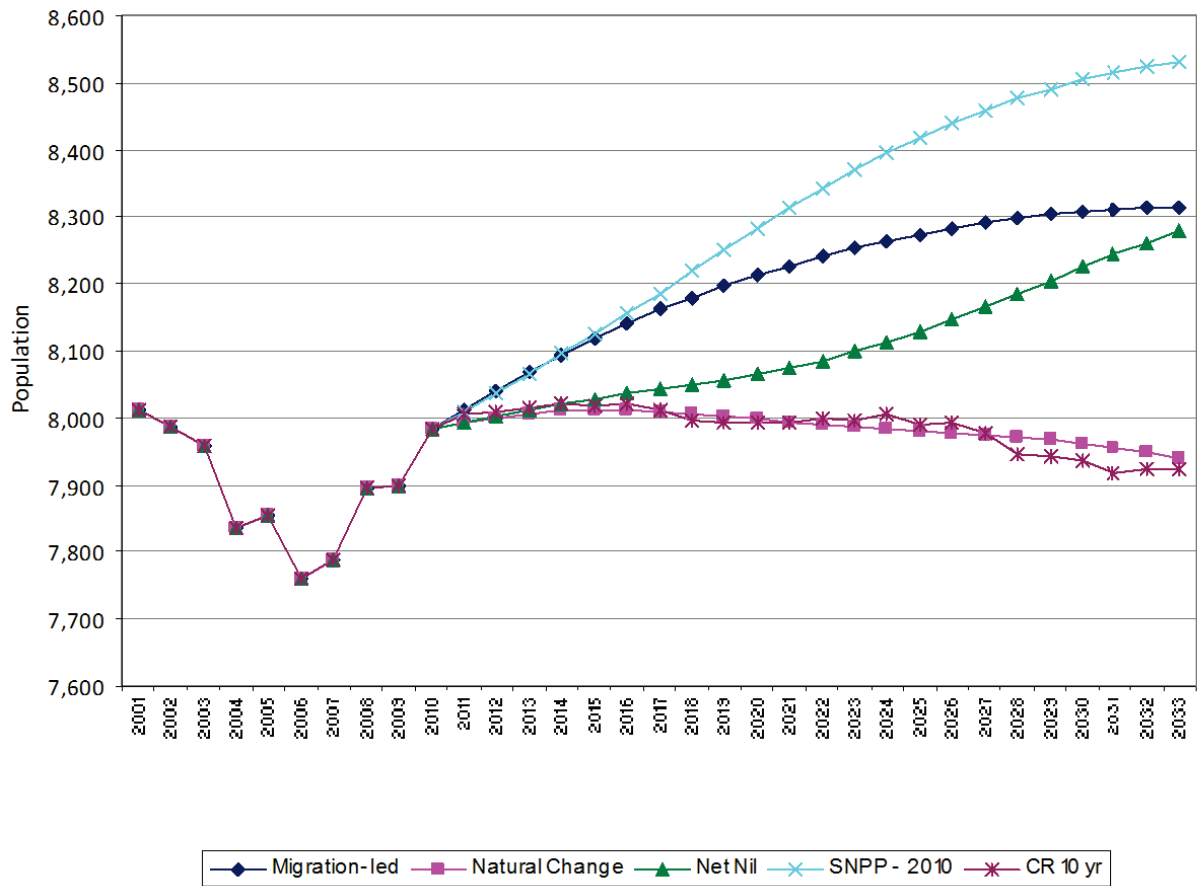
Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	7,509	28.2%	4,151	35.2%	133	185
Migration-led	6,420	24.1%	3,679	31.2%	94	164
Net Nil	5,897	22.2%	3,137	26.6%	0	140
CR 10 yr	4,266	16.0%	2,747	23.3%	16	123
Natural Change	2,559	9.6%	2,199	18.6%	0	98

Rural



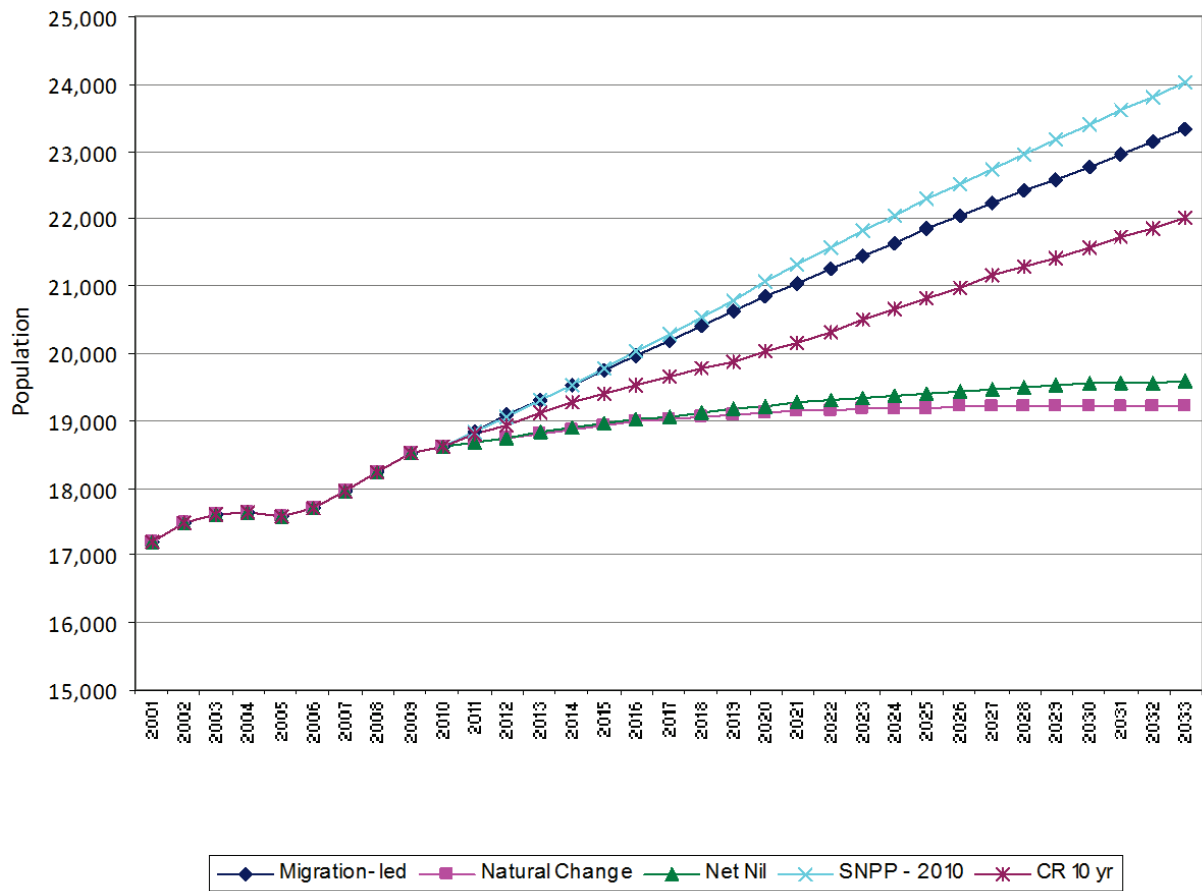
Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	5,375	12.8%	4,304	25.0%	158	192
Migration-led	4,037	9.6%	3,765	21.9%	108	168
Net Nil	2,287	5.5%	1,924	11.2%	0	86
Natural Change	1,858	4.4%	2,739	15.9%	0	122
CR 10 yr	-198	-0.5%	2,038	11.9%	-45	91

Sawbridgeworth



Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	550	6.9%	591	16.6%	28	26
Migration-led	331	4.1%	497	13.9%	19	22
Net Nil	296	3.7%	266	7.5%	0	12
Natural Change	-44	-0.6%	270	7.6%	0	12
CR 10 yr	-57	-0.7%	325	9.1%	5	15

Ware



Scenario	Change 2010 - 2033				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP - 2010	5,384	28.9%	2,922	35.5%	184	129
Migration-led	4,686	25.2%	2,619	31.8%	159	116
CR 10 yr	3,394	18.2%	2,059	25.0%	114	91
Net Nil	953	5.1%	924	11.2%	0	41
Natural Change	576	3.1%	602	7.3%	0	27

6. Dwelling-led forecasts – Phase 2

6.1. Scenario definition

The second phase of scenario development presented here contains a number of ‘Dwelling-led’ scenarios, using proposed additions to the housing stock in order to calibrate long-term forecasts of demographic change. The scenarios are referred to as 1A, 1B, 1C, 2A, 2B, 2C and 2D as specified by East Herts Council.

Under the dwelling-led forecasts, a housing target is applied to the population and household growth generated by natural change. Any shortfall in population and households against the target is then assumed to be met by migration. The use of ‘dwelling-led’ forecasts enables comparisons to be made (see Section 7) with the ‘trend-based’ forecasts in Section 5 in respect of the future demography of an area.

The seven scenarios represent the range of combinations of potential development locations that have been generated by East Herts Council for their District Plan testing process. The potential development locations have been included within the relevant parish grouping and an indicative housing total derived. It is not appropriate to run dwelling-led scenarios at the ‘town’ small area geographies as the majority of the potential development locations would fall within the residual rural area.

6.2. Scenario notes

Figure 19 shows the dwelling completion targets for each of the seven scenarios, 2011-2031. In each scenario the total dwelling target has been averaged over the twenty year period and the annualised rates are displayed in Figure 20. For example, in Scenario 1A for the Bishop’s Stortford and Northeastern Parish Grouping, the 3,047 proposed additions to the housing stock have been factored into the projection model at 152 additional dwellings per year. The population projection is constrained to meet the housing requirements set by each scenario.

Parish Grouping	1A	1B	1C	2A	2B	2C	2D
Bishop's Stortford and Northeastern	3,047	3,047	3,047	3,847	3,197	3,847	3,047
Buntingford and Central Northern	136	136	136	1,636	636	2,136	136
Hertford and Central Southwestern	1,682	1,682	1,682	1,682	1,682	1,682	1,682
Sawbridgeworth and Southeastern	8,391	5,391	3,391	2,391	3,661	391	2,391
Ware and Central Southern	745	3,745	3,745	2,445	745	2,045	745
Western	219	219	2,219	219	2,219	2,219	4,219
East Herts Total	14,220	14,220	14,220	12,220	12,140	12,320	12,220

Figure 19: Total dwelling completion targets by scenario, 2011-2031

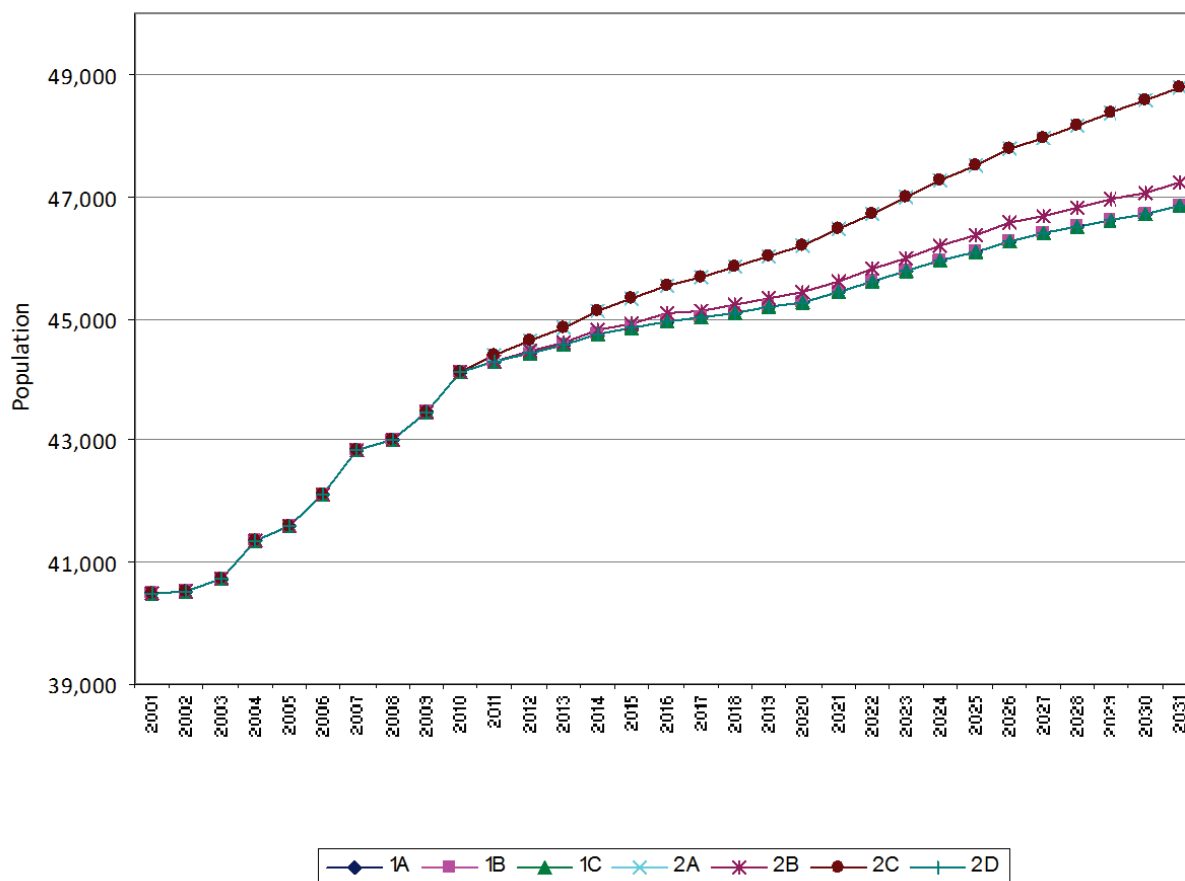
Parish Grouping	1A	1B	1C	2A	2B	2C	2D
Bishop's Stortford and Northeastern	152	152	152	192	160	192	152
Buntingford and Central Northern	7	7	7	82	32	107	7
Hertford and Central Southwestern	84	84	84	84	84	84	84
Sawbridgeworth and Southeastern	420	270	170	120	183	20	120
Ware and Central Southern	37	187	187	122	37	102	37
Western	11	11	111	11	111	111	211
East Herts Total	711	711	711	611	607	616	611

Figure 20: Annualised dwelling completion targets by scenario, 2011-2031

6.3. Parish Grouping forecasts

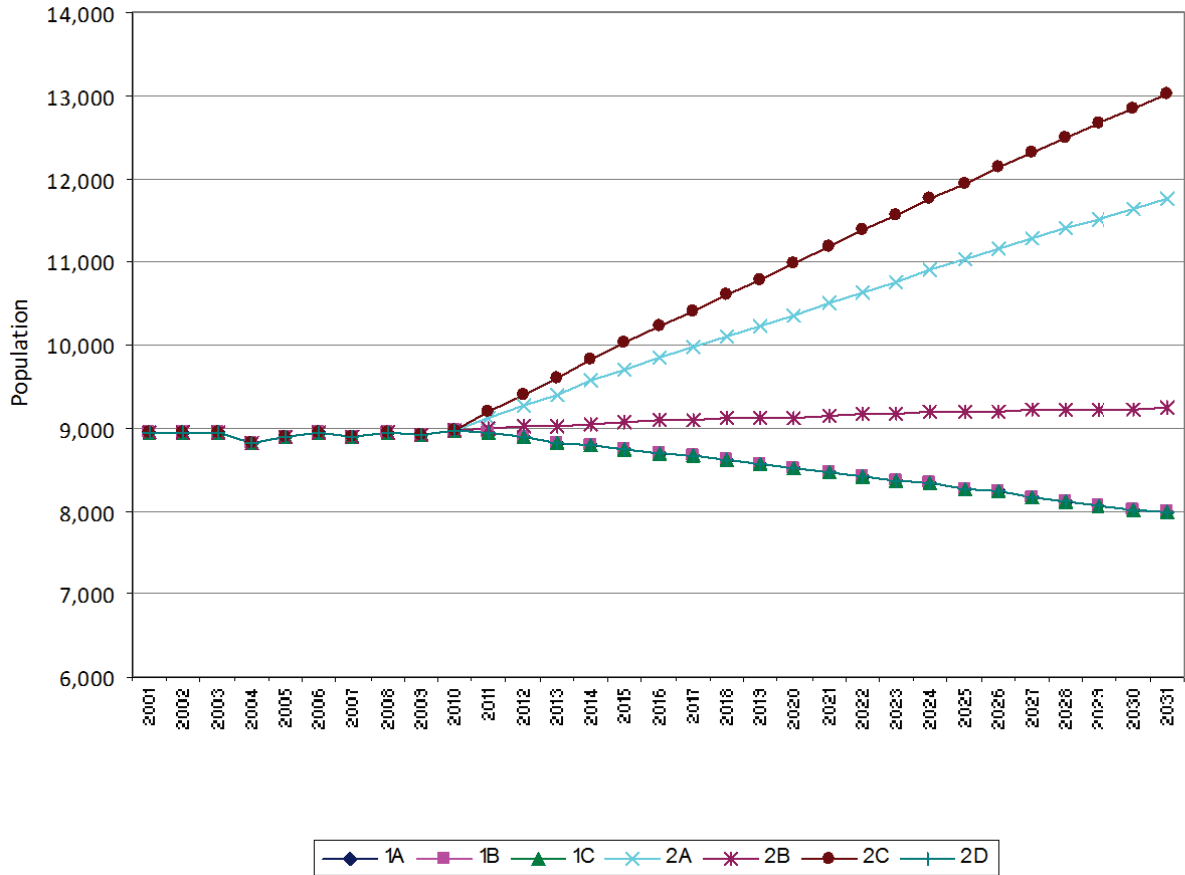
In the following illustrations, scenarios are 'ranked' in descending order of estimated household growth.

Bishop's Stortford and Northeastern



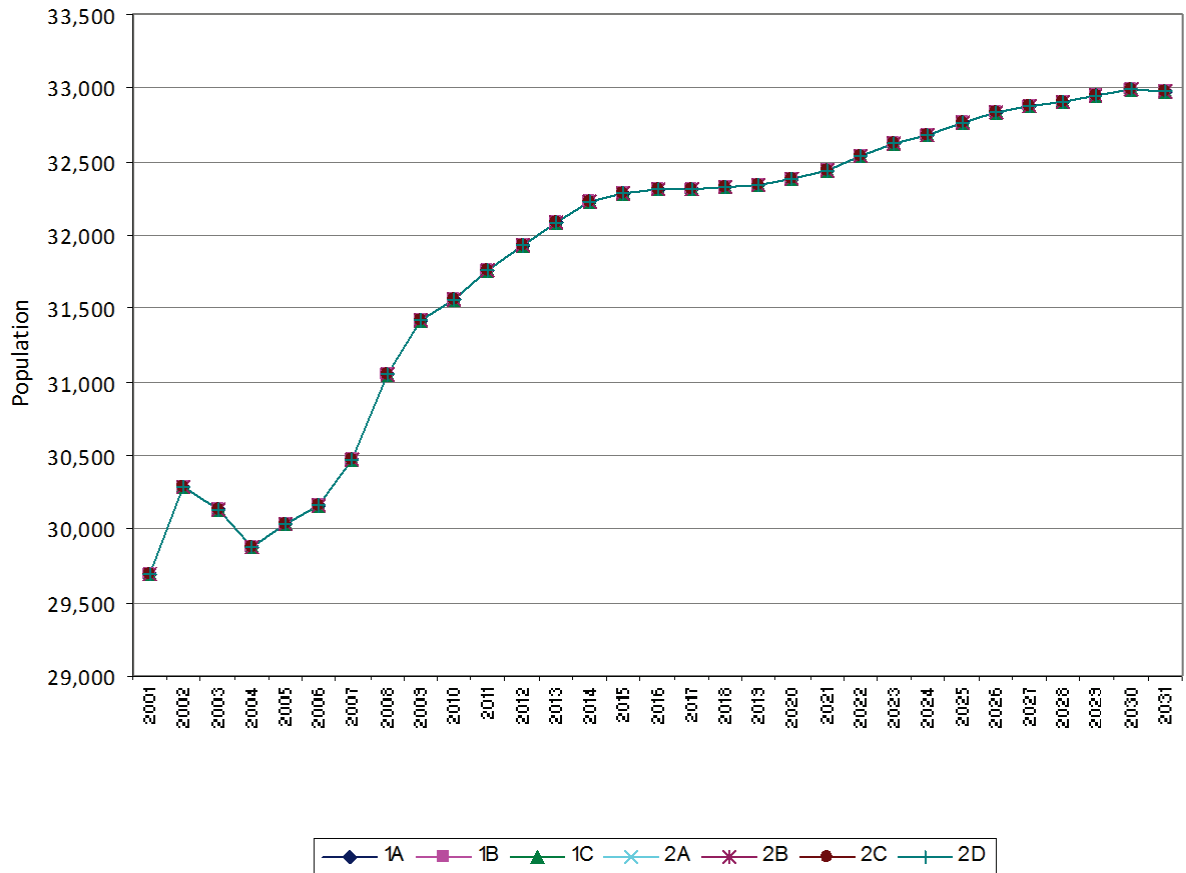
Scenario	Change 2010 - 2031				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
2A	4,681	10.6%	3,941	21.3%	56	192
2C	4,681	10.6%	3,941	21.3%	56	192
2B	3,119	7.1%	3,275	17.7%	-7	160
1A	2,759	6.3%	3,122	16.9%	-21	152
1B	2,759	6.3%	3,122	16.9%	-21	152
1C	2,759	6.3%	3,122	16.9%	-21	152
2D	2,759	6.3%	3,122	16.9%	-21	152

Buntingford and Central Northern



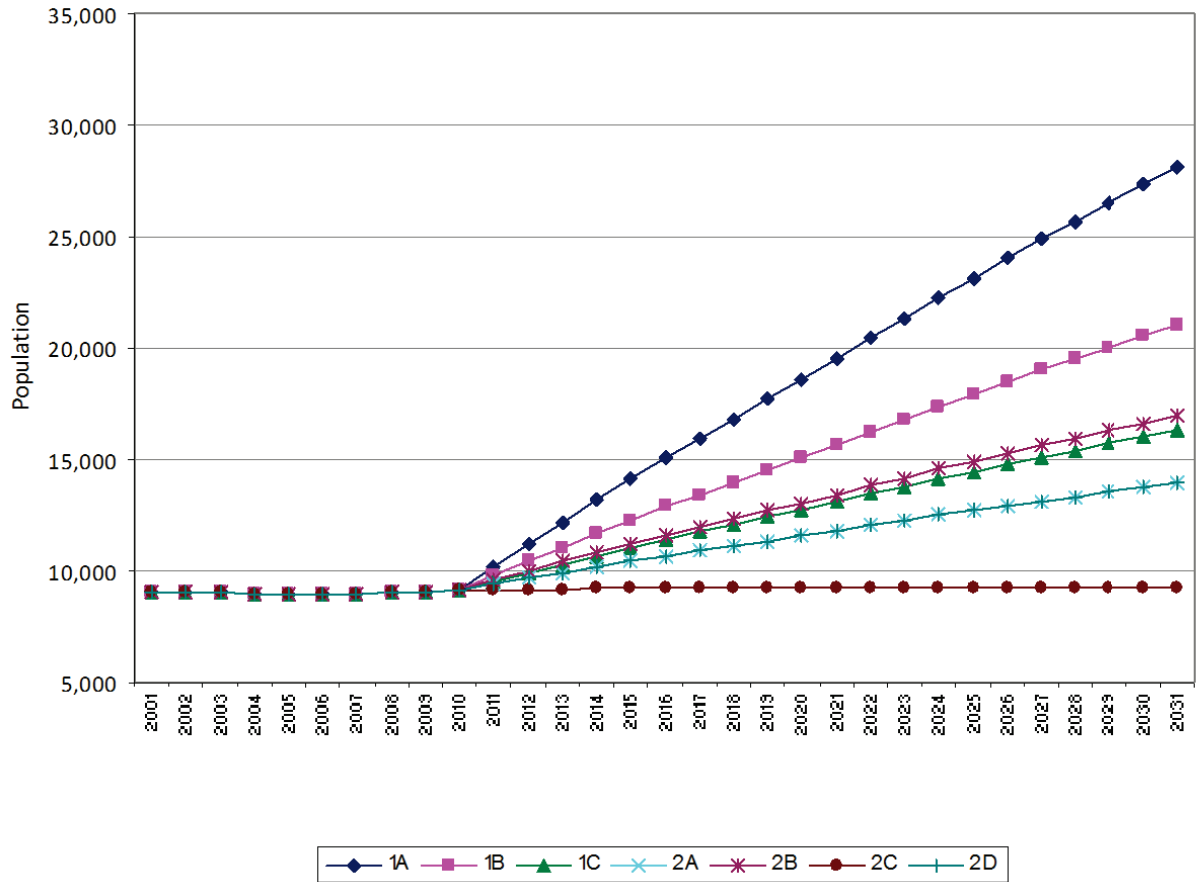
Scenario	Change 2010 - 2031				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
2C	4,048	45.1%	2,208	59.1%	179	107
2A	2,788	31.0%	1,691	45.3%	127	82
2B	267	3.0%	657	17.6%	21	32
1A	-993	-11.1%	141	3.8%	-31	7
1B	-993	-11.1%	141	3.8%	-31	7
1C	-993	-11.1%	141	3.8%	-31	7
2D	-993	-11.1%	141	3.8%	-31	7

Hertford and Central Southwestern



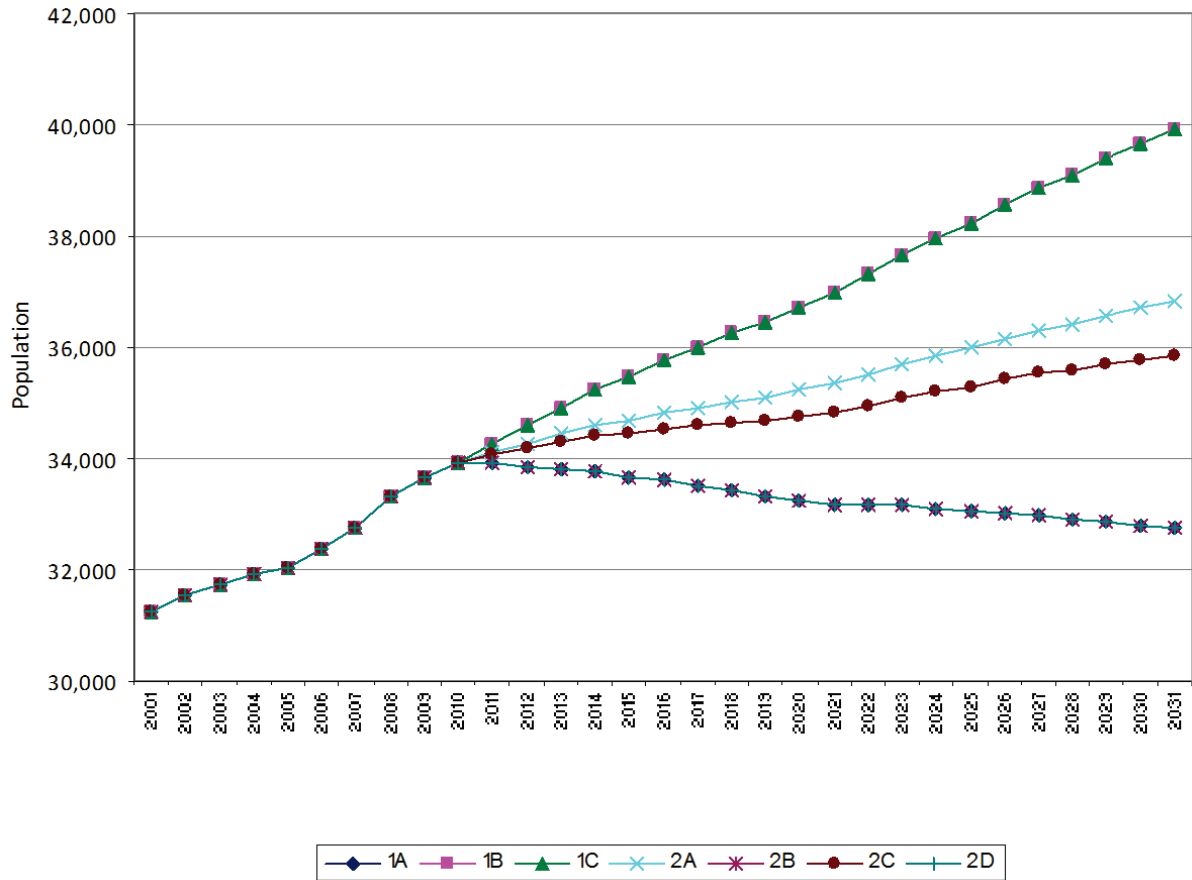
Scenario	Change 2010 - 2031				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
1A	1,425	4.5%	1,724	12.5%	-87	84
1B	1,425	4.5%	1,724	12.5%	-87	84
1C	1,425	4.5%	1,724	12.5%	-87	84
2A	1,425	4.5%	1,724	12.5%	-87	84
2B	1,425	4.5%	1,724	12.5%	-87	84
2C	1,425	4.5%	1,724	12.5%	-87	84
2D	1,425	4.5%	1,724	12.5%	-87	84

Sawbridgeworth and Southeastern



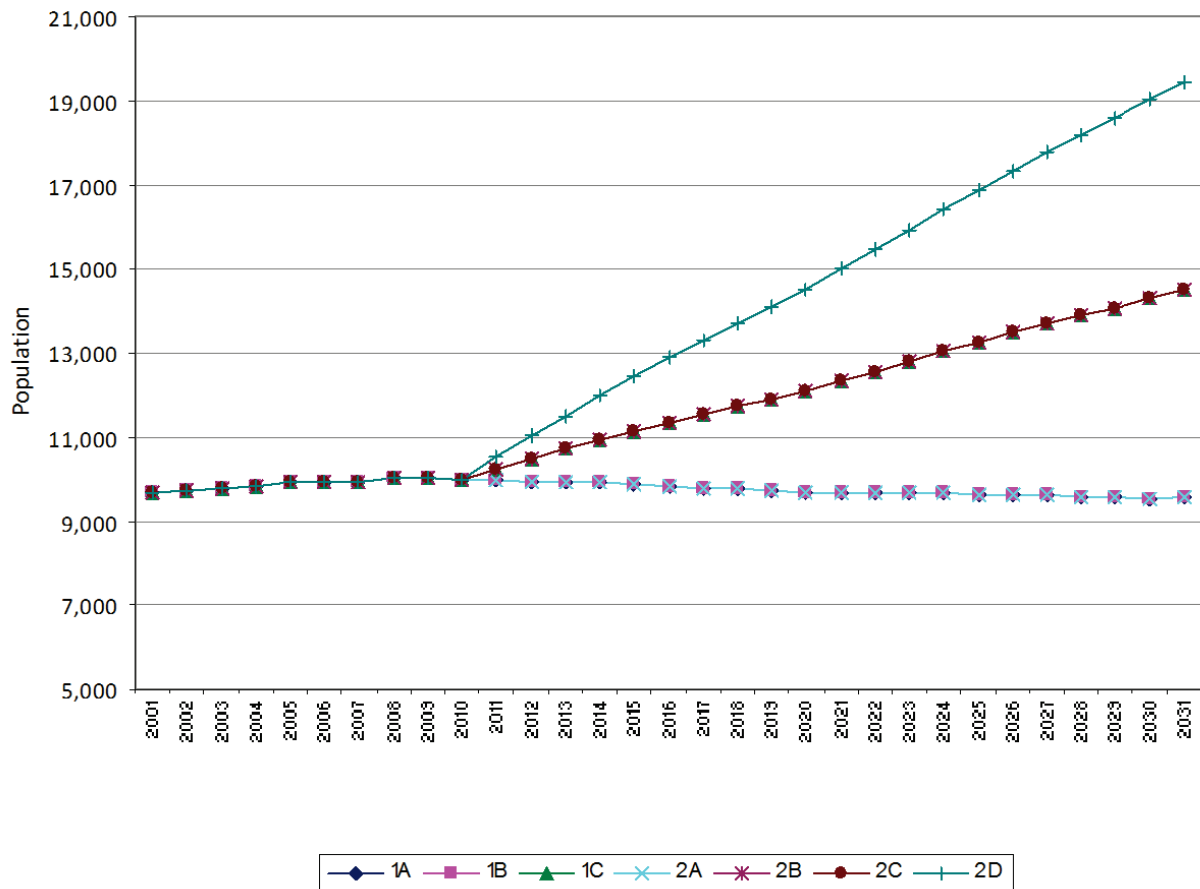
Scenario	Change 2010 - 2031				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
1A	18,988	207.9%	8,591	212.4%	800	420
1B	11,899	130.3%	5,519	136.5%	504	270
2B	7,811	85.5%	3,748	92.7%	333	183
1C	7,173	78.5%	3,472	85.8%	306	170
2A	4,810	52.7%	2,448	60.5%	207	120
2D	4,810	52.7%	2,448	60.5%	207	120
2C	82	0.9%	400	9.9%	10	20

Ware and Central Southern



Scenario	Change 2010 - 2031				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
1B	5,992	17.7%	3,848	26.4%	221	187
1C	5,992	17.7%	3,848	26.4%	221	187
2A	2,879	8.5%	2,512	17.2%	95	122
2C	1,921	5.7%	2,101	14.4%	57	102
1A	-1,193	-3.5%	765	5.3%	-69	37
2B	-1,193	-3.5%	765	5.3%	-69	37
2D	-1,193	-3.5%	765	5.3%	-69	37

Western



Scenario	Change 2010 - 2031				Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
2D	9,469	94.7%	4,320	103.3%	370	211
2B	4,516	45.2%	2,272	54.3%	168	111
1C	4,516	45.2%	2,272	54.3%	168	111
2C	4,516	45.2%	2,272	54.3%	168	111
1A	-439	-4.4%	224	5.4%	-35	11
1B	-439	-4.4%	224	5.4%	-35	11
2A	-439	-4.4%	224	5.4%	-35	11

7. Forecast comparisons

7.1. Scenario comparison

In the illustrations that follow, scenarios are 'ranked' in descending order of estimated household growth. All scenarios are presented, enabling direct comparison between the 'trend-based' forecasts and the various potential policy-driven 'dwelling-led' scenarios which reflect the Council's initial thoughts on the ability of the parish groupings to accommodate development to 2031.

7.2. Population versus household

When interpreting population and household forecasts, it is important to recognise the importance of the changing age-structure upon household numbers. An older age profile will typically result in a larger number of households due to the proliferation of one and two-person households. All areas will experience a degree of ageing but the trend will be accentuated in those areas which historically have a high proportion of retired and a relatively low level of net in-migration. It is net in-migration that would typically help to maintain a more 'youthful' population profile and thus result in a higher average household size (fewer households per head of population).

To illustrate how this might affect the six Parish Groupings, using the 'Migration-led' scenario, the percentage of the resident population that is 'retired' (females 60+ and males 65+) is compared for each area and for 2010 and 2031 (Figure 21).

Migration-led Scenario	% Retired	
	2010	2031
Bishop's Stortford and Northeastern	16.6	25.2
Buntingford and Central Northern	21.6	37.1
Hertford and Central Southwestern	17.2	24.1
Sawbridgeworth and Southeastern	22.3	33.1
Ware and Central Southern	18.7	26.4
Western	21.3	33.5

'Retired' refers to age 60 for females and age 65 for males

Figure 21: Population % retired, 2010 & 2031, Migration-led scenario

In 2010, there is a clear split between the more-urban areas (Bishop's Stortford & Northeastern, Hertford & Central Southwestern and Ware & Central Southern) and the more-rural areas (Buntingford & Central Northern, Sawbridgeworth & Southeastern and Western). The urban areas

have a retired population of 16-19%, compared to the 21-22% in the more rural areas. Over the course of the projection period all areas experience a growth in the relative size of the retired population but the trend is accentuated in the more rural Parish Groupings. In-migration and higher fertility will maintain the more youthful profile in urban areas; not so in the rural areas, where the impact of migration will be lower, or negative.

The rates of household formation in these predominantly urban and rural areas will differ, with the younger age profile associated with a larger average household size, the older age profile associated with a smaller average household size. A rural and an urban population may be similar in size but if one has a much higher retired population, its household total would be greater.

Housing development can alter the profile of an area, attracting new migrants with a younger age profile, thus reducing the retired percentage relative to the younger age-groups, with a higher average household size as a result.

These population and household issues form part of the short scenario commentary that follows.

7.3. Scenario Commentary

Bishop's Stortford and Northeastern

Figure 7 revealed that, between 2001 and 2010, Bishop's Stortford and Northeastern has displayed the highest level of population growth amongst the Parish Groupings of East Herts. Its historical population change, driven by both natural change and net-migration has resulted in the trend scenarios (SNPP-2010 and Migration-led) having the highest population and household growth over the projection period, with a housing requirement of +300 units per year.

In contrast to the higher population growth displayed in the trend projections, the variety of dwelling-led scenarios suggest that lower housing growth would be required in this Parish Grouping; 152-192 units per year to 2031. If planned housing growth is insufficient to meet the needs of the population growth assumed by the trend projection, out-migration results. Conversely, if housing growth exceeds the trend projection, in-migration will result.

The lower housing growth alternatives (152-160 units per year) result in relatively modest population growth and a small net loss through migration over the projection period. The higher housing growth scenarios (192 units per year) result in more substantial population growth and a small net in-migration of +56 per year over the projection period. These higher housing growth scenarios are not dissimilar to the Natural Change scenario for Bishop's Stortford and Northeastern, which assumes zero migration over the projection period and a housing requirement of 177 per

year. The different age-structures that evolve from the Natural Change and the 2A and 2C dwelling-led scenarios are responsible for the differences in the household, migration and dwelling outcomes that result from each scenario.

Buntingford and Central Northern

In this more rural Parish Grouping the trend scenarios (SNPP-2010 and Migration-led) suggest little growth over the projection period; with a housing requirement of approximately 20 units per year associated with the changing (ageing) age profile. A number of lower and higher-growth housing scenarios have been tested. The lower-growth alternatives result in population decline; insufficient housing to match the population size and composition, resulting in net out-migration from the area. In the absence of any net in-migration, the % retired population will increase substantially under this scenario.

In contrast, the higher housing growth scenarios result in substantial population growth through net in-migration; new housing generating a net inflow of a relatively youthful population whilst satisfying the requirements of the resident but ageing population.

Hertford and Central Southwestern

The trend projections (SNPP-2010 and Migration-led) result in the highest population and household growth over the projection period, with a housing requirement of 181-205 units per year.

There is an interesting contrast between the Natural-Change and Net-Nil scenarios. The first, models change in the absence of any migration; the second, models change with migration that has a 'net' balance of zero. These produce two very different population outcomes but similar household outcomes. This is due to the continued influence of migration (in the Net-Nil scenario) which maintains a more youthful age profile and generates a higher number of births. The Natural Change scenario results in a decline in the number of births, relative to deaths, and a more significant ageing of the population due to the lack of migration. Household change over the projection period is similar in each case but the Net-Nil scenario results in a larger number of 'family' households with higher occupancy; the Natural Change scenario results in a larger number of one and two-person households linked to the ageing population.

All dwelling-led scenarios are similarly configured for this area, with 84 housing units per year suggested. This results in more modest growth in population over the projection period, primarily from natural change in combination with a small net outflow due to migration.

Sawbridgeworth and Southeastern

In this more rural Parish Grouping the trend scenarios (SNPP-2010 and Migration-led) suggest limited population growth over the projection period; with a housing requirement of approximately 24-29 units per year associated with the changing (ageing) age profile.

A range of housing growth scenarios have been tested, most of which result in population growth that is significantly higher than the trend projections would suggest. Housing development will stimulate migration; a net inflow of migrants with a youthful age-profile, resulting in a lower retired proportion and a more balanced mix of one, two and 3+ person households.

Ware and Central Southern

The trend projections (SNPP-2010 and Migration-led) result in the highest population and household growth over the projection period, with a housing requirement of 214-237 units per year.

The Natural-Change and Net-Nil scenarios again provide an interesting contrast with a significant difference in the projected population growth but less variation in the household growth. The impact of the different age structures upon household composition is the driver behind these differences.

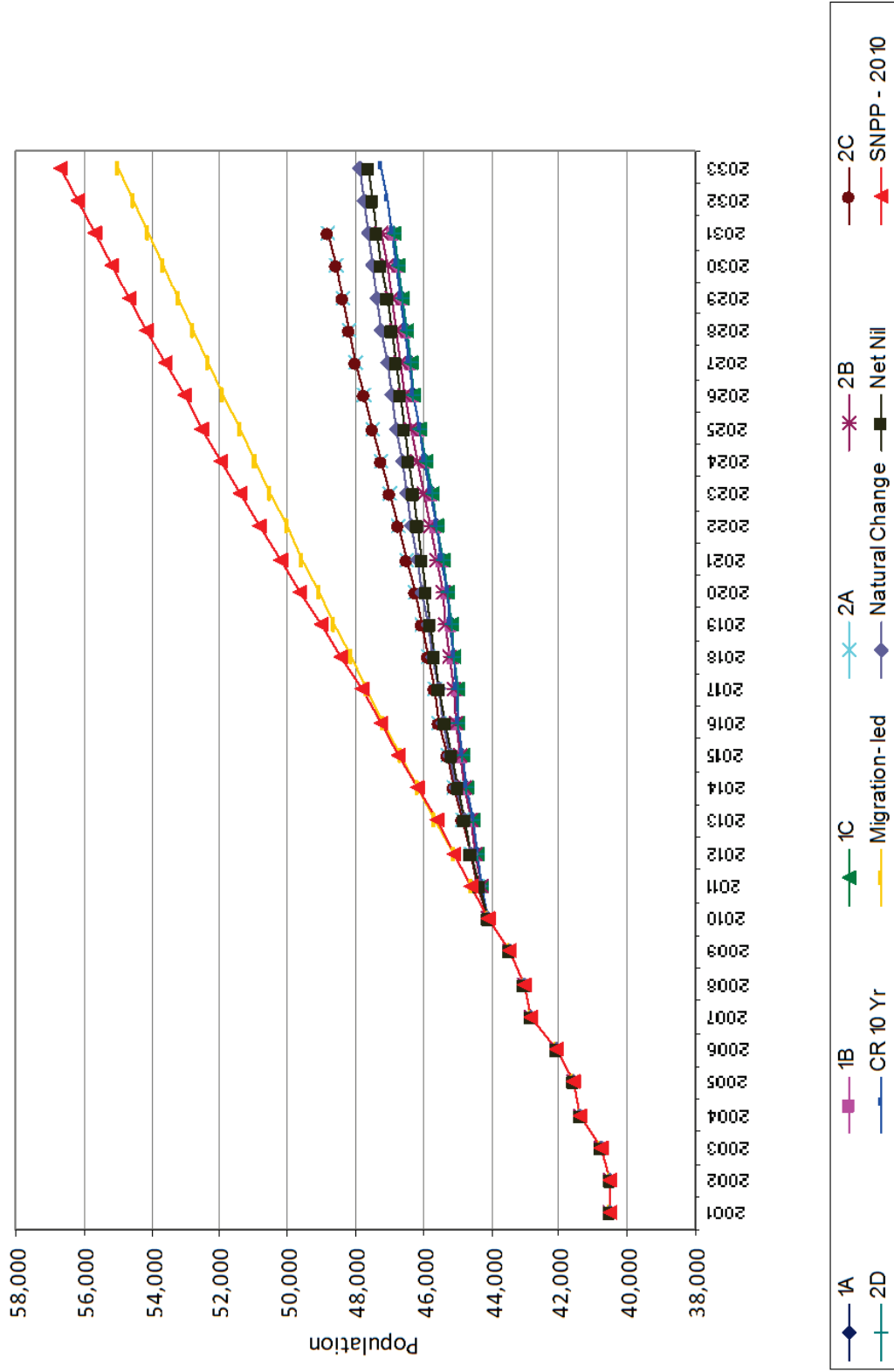
A range of lower and higher-growth housing growth scenarios are tested. The higher-growth alternatives result in population and household growth that is below the trend forecasts; 102-187 housing units per year. The lower-growth scenarios suggest only 37 housing units per year, resulting in population decline over the forecast period, with net out-migration resulting.

Western

In this more rural Parish Grouping the trend scenarios (SNPP-2010 and Migration-led) suggest limited population growth over the projection period; with a housing requirement of approximately 20-26 units per year associated with the changing age profile. The Net-Nil migration scenario results in higher growth than the trend scenarios, reflecting the fact that the area has experienced a net outflow through migration in recent years.

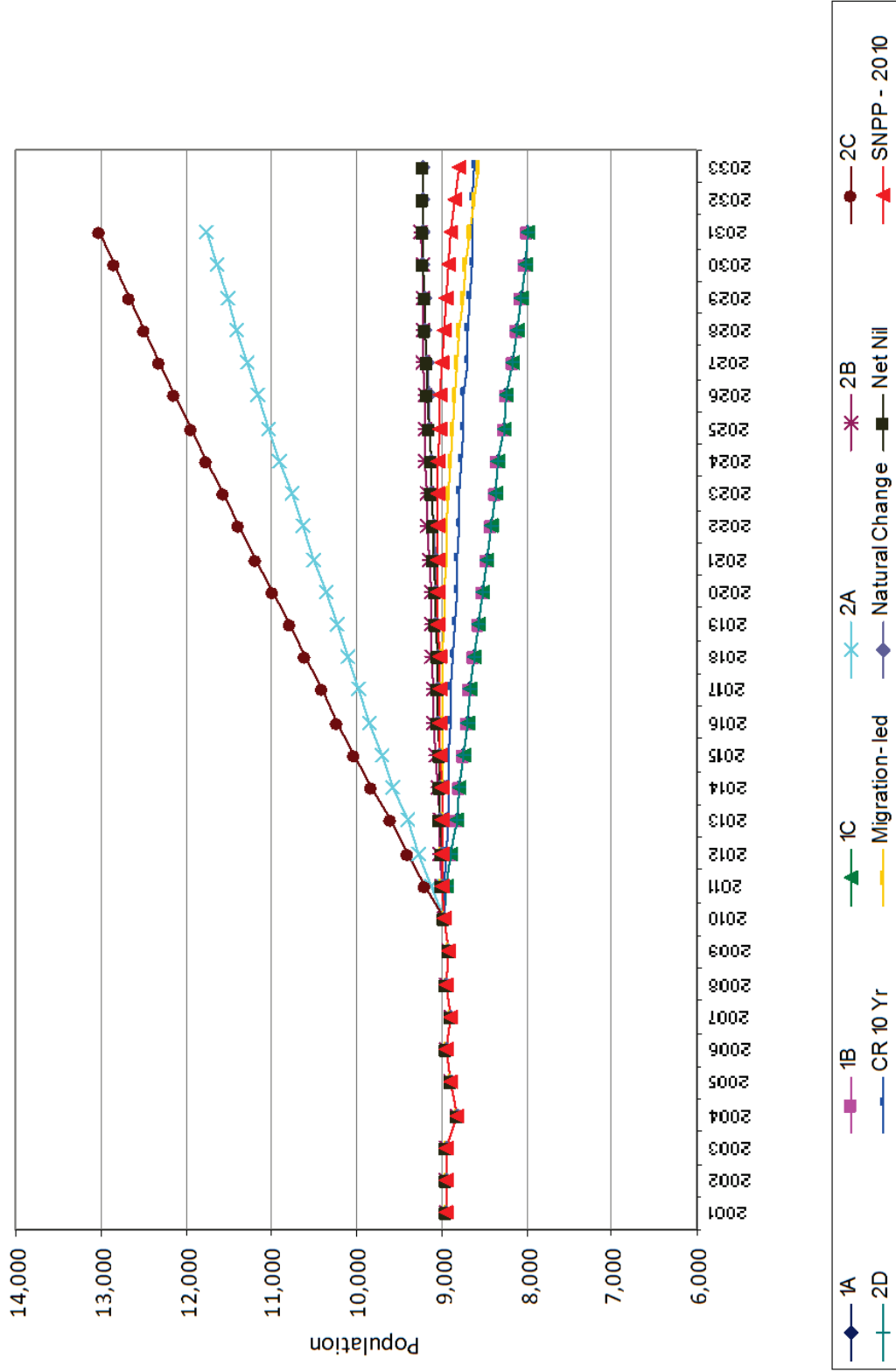
Three housing growth scenarios have been tested; 211, 111 and 11 housing units per year. The high-growth alternative results in a two-fold increase in population and households over the forecast period, with net migration of +370 per year estimated. The low growth scenario, with just 11 housing units per year, results in population decline and a net outflow due to migration each year.

Bishop's Stortford and Northeastern



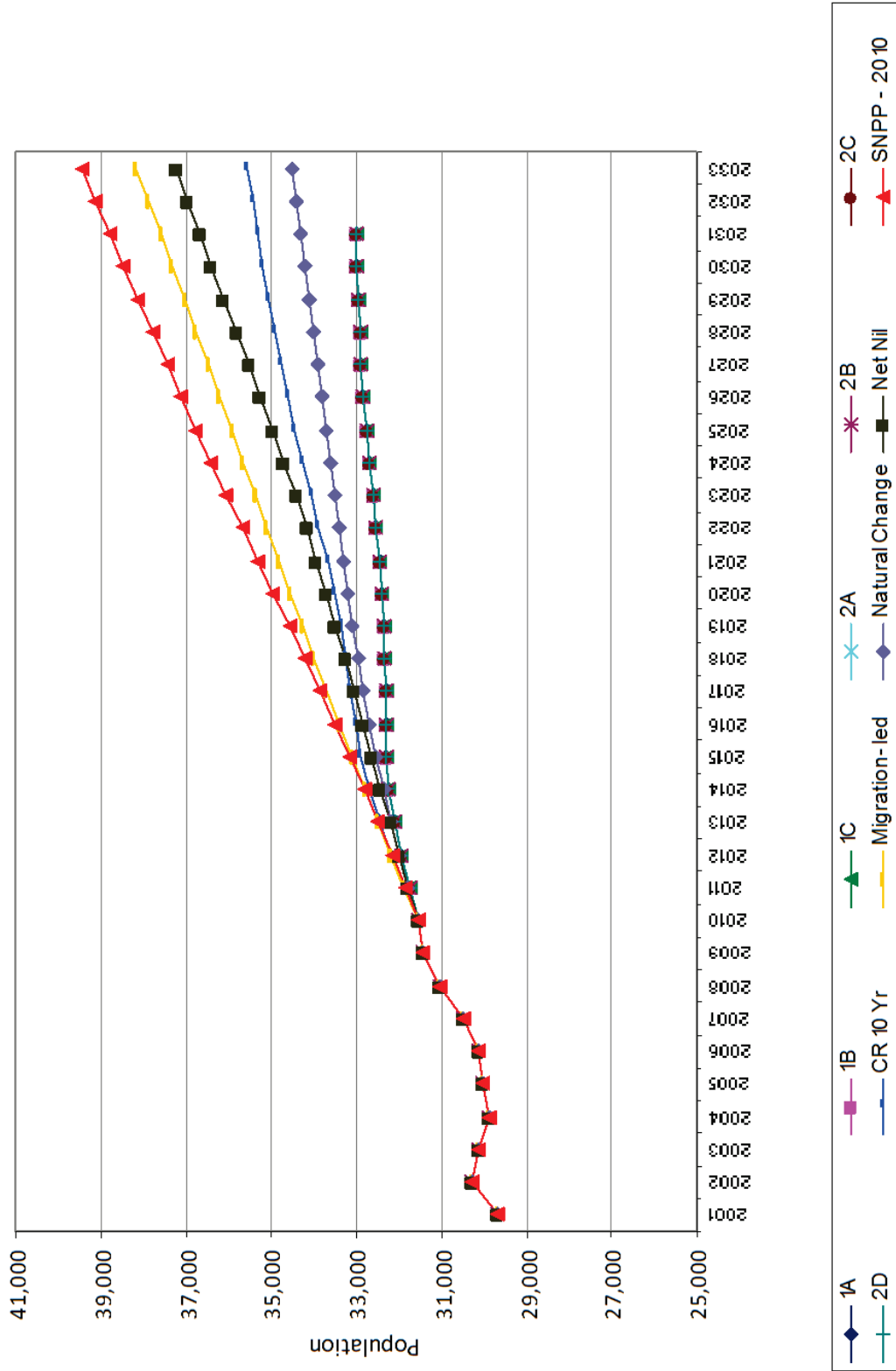
Scenario	Change 2010 - 2031						Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings		
SNPP - 2010	12,585	28.5%	7,505	40.6%	334	334		
Migration-led	10,897	24.7%	6,784	36.7%	272	302		
Natural Change	3,735	8.5%	3,973	21.5%	0	177		
2C	4,681	10.6%	3,941	21.3%	56	192		
2A	4,681	10.6%	3,941	21.3%	56	192		
CR 10 Yr	3,129	7.1%	3,447	18.7%	-11	154		
2B	3,119	7.1%	3,275	17.7%	-7	160		
1B	2,759	6.3%	3,122	16.9%	-21	152		
1C	2,759	6.3%	3,122	16.9%	-21	152		
1A	2,759	6.3%	3,122	16.9%	-21	152		
2D	2,759	6.3%	3,122	16.9%	-21	152		
Net Nil	3,493	7.9%	2,692	14.6%	0	120		

Buntingford and Central Northern



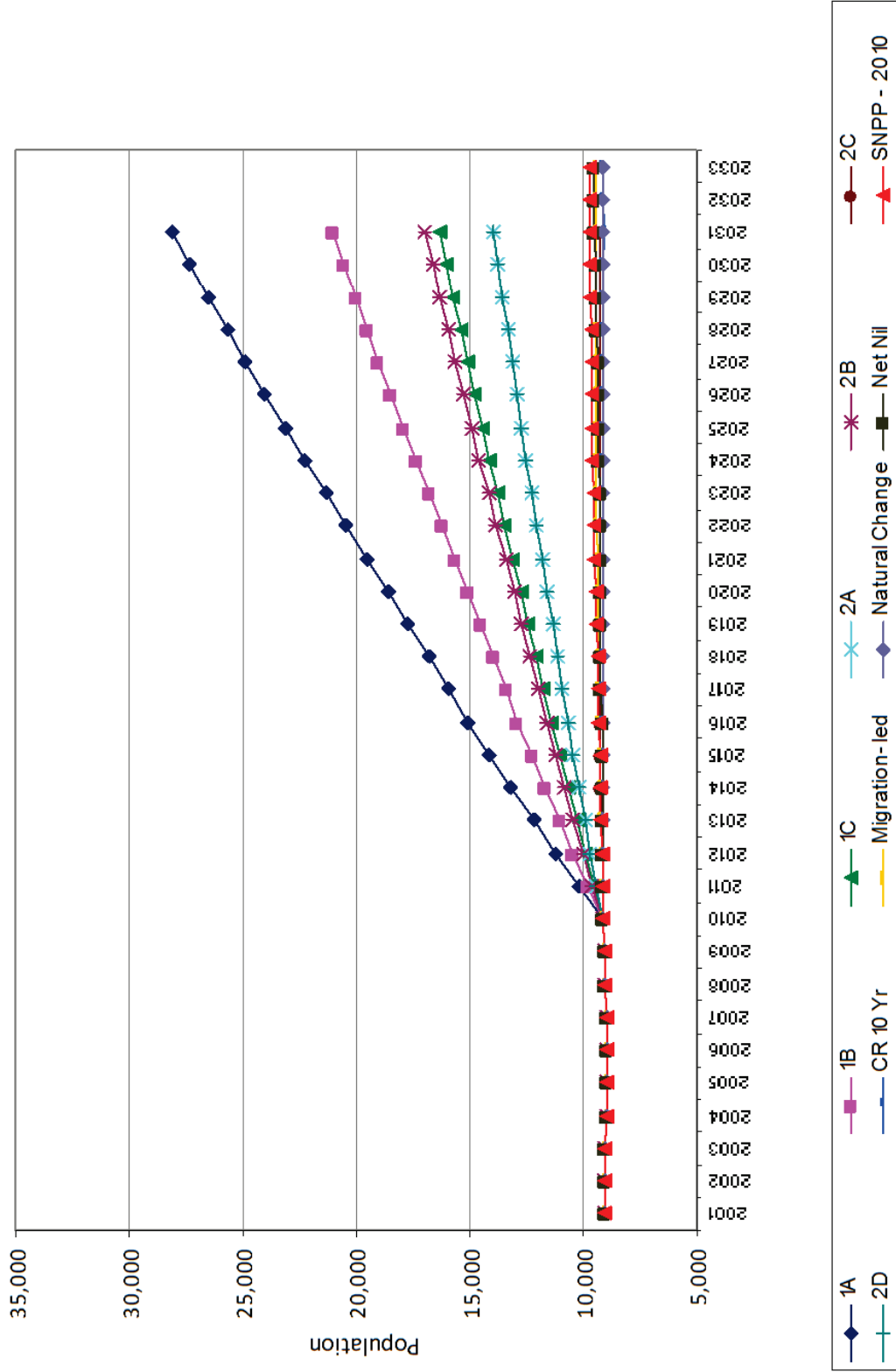
Scenario	Change 2010 - 2031						Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings		
2C	4,048	45.1%	2,208	59.1%	179	107		
2A	2,788	31.0%	1,691	45.3%	127	82		
2B	267	3.0%	657	17.6%	21	32		
SNPP - 2010	-176	-2.0%	516	13.8%	5	23		
Net Nil	250	2.8%	463	12.4%	0	20		
Natural Change	248	2.8%	457	12.2%	0	20		
CR 10 Yr	-357	-4.0%	444	11.9%	0	20		
Migration-led	-407	-4.5%	423	11.3%	-3	19		
1B	-993	-11.1%	141	3.8%	-31	7		
1C	-993	-11.1%	141	3.8%	-31	7		
1A	-993	-11.1%	141	3.8%	-31	7		
2D	-993	-11.1%	141	3.8%	-31	7		

Hertford and Central Southwestern



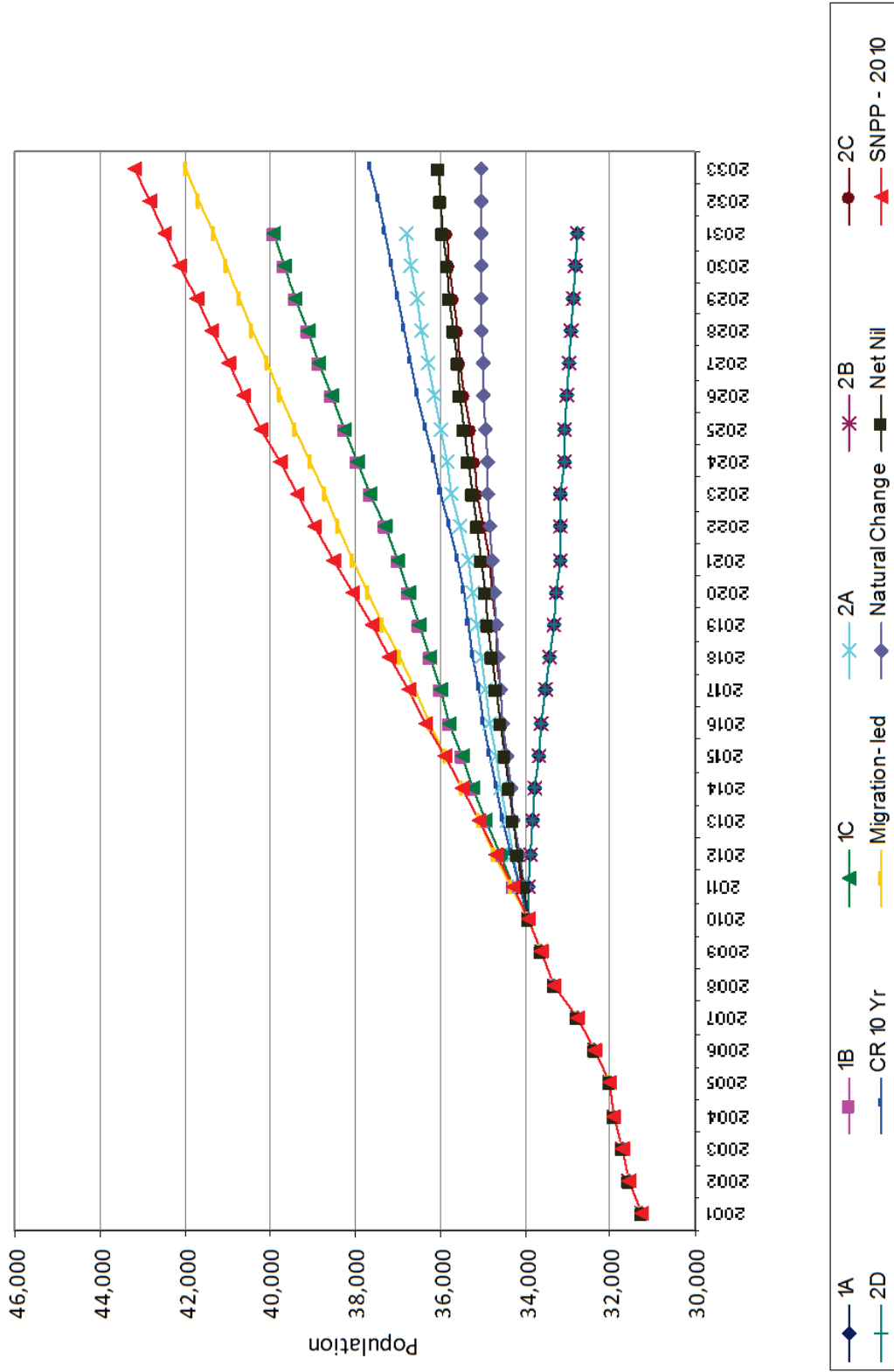
Scenario	Change 2010 - 2031						Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings		
SNPP - 2010	7,895	25.0%	4,607	33.4%	140	205		
Migration-led	6,605	20.9%	4,060	29.4%	94	181		
CR 10 Yr	4,005	12.7%	2,959	21.5%	1	132		
Natural Change	2,952	9.4%	2,683	19.5%	0	119		
Net Nil	5,692	18.0%	2,682	19.4%	0	119		
1A	1,425	4.5%	1,724	12.5%	-87	84		
1B	1,425	4.5%	1,724	12.5%	-87	84		
1C	1,425	4.5%	1,724	12.5%	-87	84		
2A	1,425	4.5%	1,724	12.5%	-87	84		
2B	1,425	4.5%	1,724	12.5%	-87	84		
2C	1,425	4.5%	1,724	12.5%	-87	84		
2D	1,425	4.5%	1,724	12.5%	-87	84		

Sawbridgeworth and Southeastern



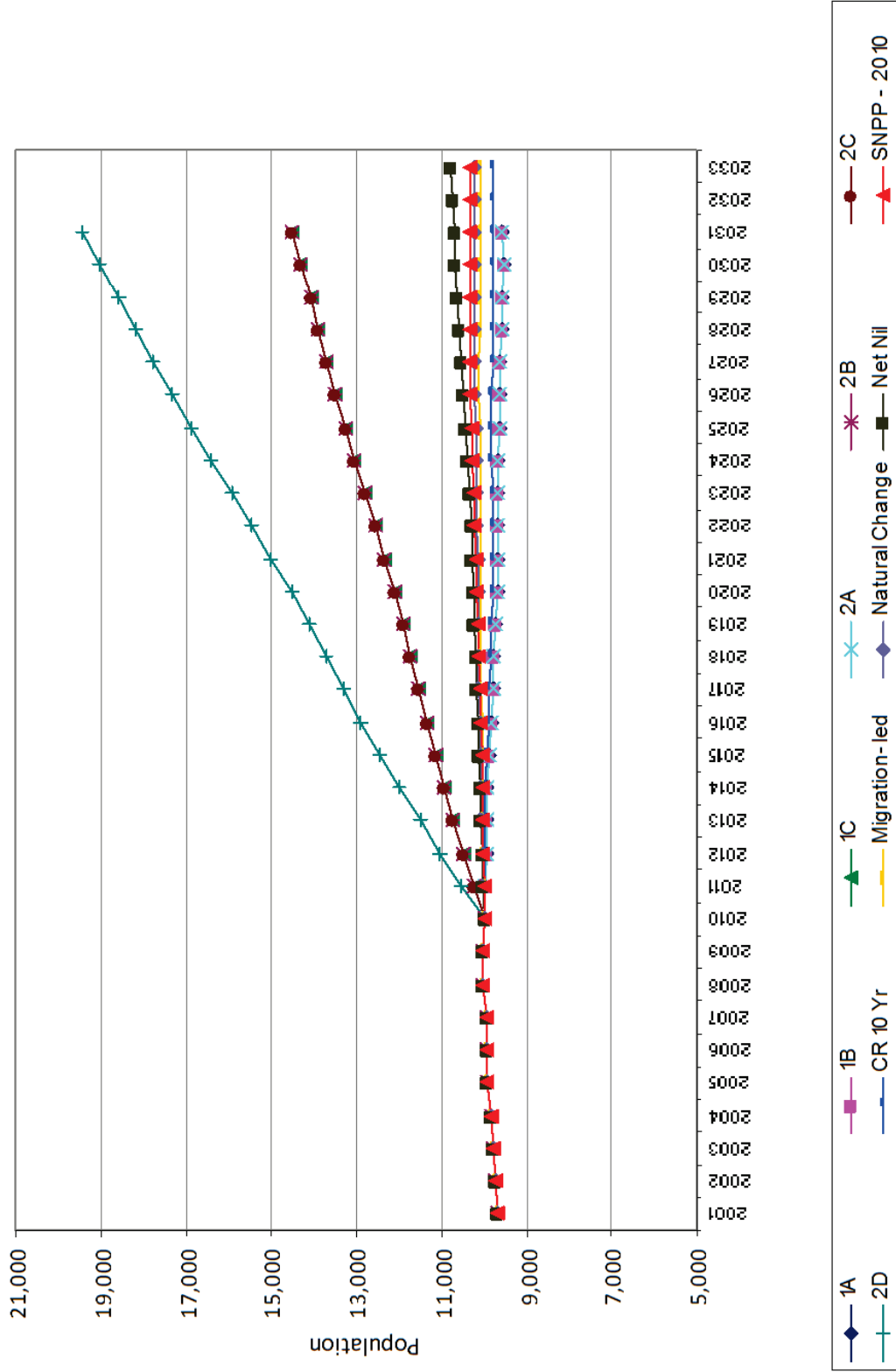
Scenario	Change 2010 - 2033					Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	
1A	18,988	207.9%	8,591	212.4%	800	420	
1B	11,899	130.3%	5,519	136.5%	504	270	
2B	7,811	85.5%	3,748	92.7%	333	183	
1C	7,173	78.5%	3,472	85.8%	306	170	
2A	4,810	52.7%	2,448	60.5%	207	120	
2D	4,810	52.7%	2,448	60.5%	207	120	
SNPP - 2010	587	6.4%	649	16.0%	30	29	
Migration-led	325	3.6%	536	13.2%	20	24	
2C	82	0.9%	400	9.9%	10	20	
CR 10 Yr	-28	-0.3%	381	9.4%	7	17	
Natural Change	-25	-0.3%	341	8.4%	0	15	
Net Nil	413	4.5%	325	8.0%	0	14	

Ware and Central Southern



Scenario	Change 2010 - 2031						Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings		
SNPP - 2010	9,227	27.2%	5,342	36.7%	321	237		
Migration-led	8,018	23.6%	4,824	33.1%	277	214		
1C	5,992	17.7%	3,848	26.4%	221	187		
1B	5,992	17.7%	3,848	26.4%	221	187		
CR 10 Yr	3,711	10.9%	2,973	20.4%	121	132		
2A	2,879	8.5%	2,512	17.2%	95	122		
2C	1,921	5.7%	2,101	14.4%	57	102		
Net Nil	2,086	6.1%	1,955	13.4%	0	87		
Natural Change	1,107	3.3%	1,606	11.0%	0	71		
2B	-1,193	-3.5%	765	5.3%	-69	37		
1A	-1,193	-3.5%	765	5.3%	-69	37		
2D	-1,193	-3.5%	765	5.3%	-69	37		

Western



Scenario	Change 2010 - 2031						Average per year	
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings		
2D	9,469	94.7%	4,320	103.3%	370	211		
2C	4,516	45.2%	2,272	54.3%	168	111		
1C	4,516	45.2%	2,272	54.3%	168	111		
2B	4,516	45.2%	2,272	54.3%	168	111		
Net Nil	799	8.0%	610	14.6%	0	27		
SNPP - 2010	354	3.5%	579	13.9%	-3	26		
Natural Change	234	2.3%	495	11.8%	0	22		
Migration-led	62	0.6%	458	11.0%	-14	20		
CR 10 Yr	-201	-2.0%	348	8.3%	-23	16		
2A	-439	-4.4%	224	5.4%	-35	11		
1A	-439	-4.4%	224	5.4%	-35	11		
1B	-439	-4.4%	224	5.4%	-35	11		

8. Conclusions

Investigating a range of 'trend' and policy driven scenarios is a key requirement of evidence-based planning. Trend scenarios provide an indication of likely trajectories of growth if recent demographic conditions continue. Policy driven scenarios provide an alternative view, based on local perspectives on the capacity of an area to accommodate development and the appropriateness of this development given the local conditions.

In evaluating the policy scenarios, the forecasting model uses its 'migration' element to balance population growth against proposed housing development. If housing growth exceeds the expected 'trend' projection of population, then net in-migration will result. Conversely, if the population growth trend exceeds planned housing growth, net out-migration will result. Trend projections may exceed policy scenarios but it may therefore be concluded that in planning terms, a particular area does not necessarily have the physical ability to accommodate the development.

The scenarios presented in this report provide a range of evidence from which to base local planning decisions on future housing development. Whilst these decisions are a necessity to enable short-medium term trajectories to be agreed, it is recommended that evidence and decisions are regularly reviewed as new demographic information becomes available (from the last Census) and as economic conditions begin to improve.

Appendix

Average household size: Parish Grouping forecasts (trend-led)

Parish Grouping	Migration-led		SNPP 2010		Natural Change		Net-Nil Migration		CR 10 Yr	
	2010	2033	2010	2033	2010	2033	2010	2033	2010	2033
Bishop's Stortford and Northeastern	2.37	2.15	2.37	2.16	2.37	2.10	2.37	2.22	2.37	2.13
Buntingford and Central Northern	2.40	2.05	2.40	2.06	2.40	2.19	2.40	2.19	2.40	2.05
Hertford and Central Southwestern	2.27	2.11	2.27	2.12	2.27	2.07	2.27	2.24	2.27	2.10
Sawbridgeworth and Southeastern	2.24	2.05	2.24	2.06	2.24	2.06	2.24	2.17	2.24	2.04
Ware and Central Southern	2.30	2.13	2.30	2.14	2.30	2.13	2.30	2.14	2.30	2.11
Western	2.38	2.16	2.38	2.17	2.38	2.18	2.38	2.25	2.38	2.16

Average household size: Town forecasts (trend-led)

Town	Migration-led		SNPP 2010		Natural Change		Net-Nil Migration		CR 10 Yr	
	2010	2033	2010	2033	2010	2033	2010	2033	2010	2033
Bishop's Stortford	2.34	2.13	2.34	2.13	2.34	2.07	2.34	2.20	2.34	2.10
Buntingford	2.37	2.02	2.37	2.03	2.37	2.12	2.37	2.15	2.37	2.01
Hertford	2.23	2.11	2.23	2.12	2.23	2.06	2.23	2.15	2.23	2.10
Rural	2.42	2.17	2.42	2.18	2.42	2.17	2.42	2.29	2.42	2.15
Sawbridgeworth	2.22	2.03	2.22	2.03	2.22	2.05	2.22	2.14	2.22	2.02
Ware	2.24	2.12	2.24	2.12	2.24	2.13	2.24	2.10	2.24	2.11

Average household size: Parish grouping forecasts (dwelling-led)

Parish Grouping	1A		1B		1C		2A		2B		2C		2D	
	2010	2031	2010	2031	2010	2031	2010	2031	2010	2031	2010	2031	2010	2031
Bishop's Stortford and Northeastern	2.37	2.14	2.37	2.14	2.37	2.14	2.37	2.15	2.37	2.14	2.37	2.15	2.37	2.14
Buntingford and Central Northern	2.40	2.05	2.40	2.05	2.40	2.05	2.40	2.16	2.40	2.10	2.40	2.19	2.40	2.05
Hertford and Central Southwestern	2.27	2.10	2.27	2.10	2.27	2.10	2.27	2.10	2.27	2.10	2.27	2.10	2.27	2.10
Sawbridgeworth and Southeastern	2.24	2.22	2.24	2.19	2.24	2.16	2.24	2.14	2.24	2.17	2.24	2.06	2.24	2.14
Ware and Central Southern	2.30	2.10	2.30	2.14	2.30	2.14	2.30	2.12	2.30	2.10	2.30	2.12	2.30	2.10
Western	2.38	2.16	2.38	2.16	2.38	2.24	2.38	2.16	2.38	2.24	2.38	2.24	2.38	2.29

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Draft Scenario Table for Testing Purposes Only

These are draft scenarios for testing purposes only and have been developed to assist with the various technical modelling work that is being undertaken as part of the preparation of the District Plan. The scenarios are based upon the agreed position at the end of Step 4: Sieve 2 Settlement Evaluations.

Parish Grouping	Location	Scenario 1A	Scenario 1B	Scenario 1C	Scenario 2A	Scenario 2B	Scenario 2C	Scenario 2D
Bishop's Stortford & Northeastern Parishes	Bishop's Stortford South	0	0	0	800	0	800	0
	Bishop's Stortford East	0	0	0	0	150	0	0
	Bishop's Stortford North	2500	2500	2500	2500	2500	2500	2500
	Bishop's Stortford Other	458	458	458	458	458	458	458
	Notheastern Villages	89	89	89	89	89	89	89
Buntingford & Central Northern Parishes	Buntingford A (2000) and B (500)	0	0	0	1500	500	2000	0
	Buntingford Other	67	67	67	67	67	67	67
	Central Northern Villages	69	69	69	69	69	69	69
Hertford & Southwestern Parishes	Hertford West	600	600	600	600	600	600	600
	Hertford North	100	100	100	100	100	100	100
	Hertford South	100	100	100	100	100	100	100
	Hertford Other	875	875	875	875	875	875	875
	Central Southwestern Villages	7	7	7	7	7	7	7
Sawbridgeworth & Southeastern Parishes	North of Harlow A	8,000	0	0	0	0	0	0
	North of Harlow B	0	5000	0	0	0	0	0
	Sawbridgeworth West	0	0	3000	2000	3000	0	2000
	Sawbridgeworth - N and S of West Road	200	200	200	200	200	200	200
	Sawbridgeworth Other	111	111	111	111	111	111	111
	Southeastern Villages	80	80	80	80	350	80	80
Ware & Central Southern Parishes	Ware North (1700) Ware East (1300)	0	3000	3000	1700	0	1,300	0
	Ware (High Oak Road Area only)	200	200	200	200	200	200	200
	Ware Other	147	147	147	147	147	147	147
	Central Southern Villages	398	398	398	398	398	398	398
Western Parishes	East of WGC (East Herts 2000, Welhat 2000)	0	0	2000	0	2000	2000	4,000
	Western Villages	219	219	219	219	219	219	219
Total		14,220	14220	14220	12220	12140	12320	12220

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL - 28 NOVEMBER 2012
EXECUTIVE - 4 DECEMBER 2012

REPORT OF EXECUTIVE MEMBER FOR STRATEGIC PLANNING
AND TRANSPORT

STRATEGIC LAND AVAILABILITY ASSESSMENT (SLAA) – ROUND 2
INITIAL REPORT AND WINDFALL ANALYSIS (OCTOBER 2012)

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents Members with the initial technical report of Rounds 1 and 2 of the Council's ongoing Strategic Land Availability Assessment (SLAA), which also includes analysis in respect of 'windfall' development to inform the housing requirement in the District plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:</u>	
(A)	the Officer responses to the feedback received from stakeholders as part of Round 2: Stakeholder Engagement of the Strategic Land Availability Assessment (SLAA), be supported;
(B)	the Strategic Land Availability Assessment (SLAA) Technical Study: Initial Report - Rounds 1 and 2 (October 2012), be supported as technical work to inform the preparation of the East Herts District Plan and for housing supply purposes;
(C)	the district-wide SLAA Round 2 capacity of 2,350 dwellings be supported for informing ongoing work in developing the District Plan: Part 1; and
(D)	the 'windfall' allowance of 1,700 dwellings be supported for informing ongoing work in developing the District Plan: Part 1.

<u>RECOMMENDATIONS FOR COUNCIL:</u> That:	
(A)	the Officer responses to the feedback received from stakeholders as part of Round 2: Stakeholder Engagement of the Strategic Land Availability Assessment (SLAA), be agreed;
(B)	the Strategic Land Availability Assessment (SLAA) Technical Study: Initial Report - Rounds 1 and 2 (October 2012), be agreed as technical work to inform the preparation of the East Herts District Plan and for housing supply purposes;
(C)	the district-wide SLAA Round 2 capacity of 2,350 dwellings be used to inform ongoing work in developing the District Plan: Part 1; and
(D)	the ‘windfall’ allowance of 1,700 dwellings be used to inform ongoing work in developing the District Plan: Part 1.

1.0 Background

- 1.1 Publication of the National Planning Policy Framework (NPPF) in March 2012 has reiterated the requirement for local planning authorities to prepare a Strategic Housing Land Availability Assessment ‘*to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period*’ (NPPF paragraph 159).
- 1.2 The SLAA is part of the proactive plan-making process and will help ensure that the Council meets its requirement to maintain a continuous five year supply of housing across the district.
- 1.3 The SLAA is being undertaken in stages or rounds in tandem with the preparation of the District Plan. It is however, a separate and technical piece of work.
- Round 1 - series of stakeholder meetings to provide advice and guidance on SLAA sites
 - Round 2 - assessment of sites deemed to be available for development within settlement boundaries
 - Round 3 - assessment of sites outside settlement boundaries and any further sites within settlement boundaries

- Round 4 - annual update of SLAA to review site assessments and assess any additional sites
- 1.4 In addition to the fact that the SLAA is being undertaken in rounds, it should be noted that the SLAA is an ongoing piece of work in the sense that its conclusions will be updated annually. This is because the overriding purpose of the SLAA is to have up-to-date information on the availability of land across East Herts. Thus if the status of a particular site changes (e.g. a site ceases to be occupied) this change should be reflected in the SLAA.
- 1.5 The Initial Report of the SLAA Technical Study - Rounds 1 and 2 (October 2012) is available to view as a background paper to this report at www.eastherts.gov.uk/slaa. This document explains how the SLAA has been undertaken and presents an assessment of the deliverability of sites assessed through Round 2 of the SLAA. The SLAA Technical Study will be updated and re-published at the end of Round 3 to take account of the additional sites that have been assessed. It will then be revised and re-published annually (Round 4) to ensure that it provides a robust assessment as possible of the availability of land in East Herts.
- 1.6 It should be remembered that the SLAA does *not* make decisions about whether a site should come forward for development: it simply provides an assessment as to the *likelihood* of a site coming forward for development.
- 2.0 Report
- SLAA Round 1
- 2.1 Round 1 of the SLAA sought strategic advice and guidance on the deliverability of sites across the district from a number of stakeholders from the development industry. Representatives of town and parish councils and civic societies were also invited to attend. Seven SLAA Partnership meetings were held throughout autumn 2011. The valuable feedback received has informed the assessments undertaken in Round 2. The feedback also provided useful contextual information in respect of the preparation of the District Plan itself.
- SLAA Round 2
- 2.2 Round 2 considered sites within the development boundaries of the Six Main Settlements and Category 1 Villages i.e. those sites

where there is no in-principle objection to development. Owing to limited Officer resources it was agreed to focus attention on those sites deemed to be initially available for development. As such, there will be additional sites within settlement boundaries that need to be assessed. This work is likely to be undertaken alongside Round 3.

- 2.3 In undertaking Round 2, Officers completed an initial assessment of each site (available at www.eastherts.gov.uk/slaa). Stakeholders, including members of the SLAA Partnership, town and parish councils, and East Herts District Councillors were invited to comment on these initial assessments in May/June 2012. The comments received were made available to Members at the District Planning Executive Panel on 26th July 2012.
- 2.4 The feedback received from this period of stakeholder engagement has informed the final site assessments and a schedule of Officer responses to the stakeholder engagement is attached at **Essential Reference Paper 'B'**.
- 2.5 There have been a number of amendments to the site assessments. Such amendments have been based on:
- Feedback received to the stakeholder engagement;
 - Updated information and assessment by Officers to better take account of deliverability; and,
 - Changes to the SLAA Assessment Criteria
- 2.6 A schedule setting out the material changes to the SLAA sites (i.e. where there has been a change to either the time period or housing capacity of the site) is attached at **Essential Reference Paper 'C'**. The full final SLAA site assessments are included as a background paper to this report which is available online at www.eastherts.gov.uk/slaa.
- 2.7 Following the stakeholder engagement, it was considered appropriate to revise the SLAA Assessment Criteria as set out in Figure 1. Where appropriate, the assessment criteria have also been updated to take into account the publication of the NPPF by removing references to Planning Policy Statements (PPS).

Figure 1: Revisions to SLAA Criteria

Criteria	Previous (Nov 2011)		Revised (Nov 2012)		Reason for Change
	Comment	Assessment	Comment	Assessment	
Major – Flood Risk Is the site in an area of flood risk?	PPS25 sets out a sequential approach to development in areas of flood risk with the aim to steer new development away from areas of highest risk (Zone 3). Information from the Environment Agency Flood Maps and East Herts Strategic Flood Risk Assessment (SFRA).	Zone 3 high probability – RED Zone 2 medium probability – AMBER Zone 1 low probability –GREEN	The NPPF sets out a sequential approach to development in areas of flood risk with the aim to steer new development away from areas of highest risk (Zone 3). Surface water flooding could also act as a constraint on development on sites identified as being at risk. Information from the Environment Agency Flood Maps and Surface Water Inundation Maps and East Herts Strategic Flood Risk Assessment (SFRA).	Zone 3 high probability – RED Zone 2 medium probability OR Any site identified to be at risk of surface water flooding – AMBER Zone 1 low probability –GREEN	Following stakeholder feedback received from EHC Engineering, it was considered that the issue of surface water flooding should be added to the site assessment criteria, as this could also act as a constraint on development.
Access – Buses Is the site accessible to a bus stop?	Within 800m (10 mins) walk of a bus stop. Sites closer to passenger transport facilities are regarded as being in more sustainable	Outside threshold – RED Within the threshold but where the bus stop has a low service frequency – AMBER	Within 400m (5 mins) walk of a bus stop. Sites closer to passenger transport facilities are regarded as being in more sustainable	Outside threshold – RED Within the threshold but where the bus stop has a low service frequency – AMBER	Following stakeholder feedback received from HCC Passenger Transport, who stated that the normal assessment

	locations.	Within threshold - GREEN	locations.	Within threshold - GREEN	criteria is assumed to be within 400m walk of a bus stop.
Site – Access Standards Does access to the site affect its development?	Need to ensure that the access (whether existing or proposed) meets current highway standards.	Does not meet current standards – RED Requires highway works – AMBER Access acceptable/minor works required - GREEN	Need to ensure that the access for the site (whether existing or proposed) meets or is likely to meet current highway standards. Major highway works include new roads, major changes to junctions etc.	No access to site/Unlikely to meet current standards – RED Requires major highway works – AMBER Access acceptable/minor highway works required - GREEN	Following stakeholder feedback, it was considered that this assessment criteria needed amending to introduce greater clarity to the traffic light assessment.
Local – Leisure, Recreation, Community Is the site designated for leisure, recreational or community use in the Local Plan?	Local Plan Policies LRC1, LRC11 and OSV8 seek to prevent the loss of facilities which contribute to sustainable mixed communities.	Yes – AMBER No - GREEN	Local Plan Policies STC8, LRC1, LRC11 and OSV8 seek to prevent the loss of facilities which contribute to sustainable mixed communities.	Yes – AMBER No - GREEN	Local Plan Policy STC8 also seeks to prevent the loss of facilities which contribute to sustainable mixed communities, with particular regard to local centres and provision in rural areas.

- 2.8 It should be noted that the final site assessments also incorporate the revisions to the assessment criteria and a full copy of the revised assessment criteria is included in the Technical Study which is available as a background paper to this report at www.eastherts.gov.uk/slaa.
- 2.9 One other revision to the ‘methodology’ is to the site size threshold. Previously, it was proposed to apply a different threshold to sites in Category 1 and 2 Villages. However, on reflection, and given the difficulty in identifying smaller sites, it is felt that a single threshold of 5 or more dwellings or 0.16 hectares should be applied across the District. This also ties in with the monitoring processes employed by Hertfordshire County Council in respect of small sites and dovetails neatly with the approach to ‘windfall’ analysis set out below and in the Technical Study background paper which is available at www.eastherts.gov.uk/slaa.
- 2.10 For comparison purpose, the initial SLAA Round 2 assessments identified capacity within the development boundaries of the Six Main Settlements and Category 1 Villages, of 2,173 dwellings district-wide over a 15 year period. Following the stakeholder engagement this figure has been revised to 2,350 and is as follows:

Figure 2: Initial and Final SLAA Numbers

Round 2	Initial Assessment	Final Assessment
Bishop’s Stortford	708	817
Buntingford	67	44
Hertford	875	913
Sawbridgeworth	111	91
Stanstead Abbots & St Margarets	37	17
Ware	147	239
Category 1 Villages	228	229

2.11 A number of sites that have been assessed have now been discounted because they are considered to be unsuitable for development at the current time. These are identified with a ‘0’ (zero) in the capacity column in the schedule of material changes which is attached at **Essential Reference Paper ‘C’**. Please note: whilst these sites have been discounted at the current time, they will continue to be monitored in case their status changes and this results in them being deemed suitable for development. Should this be the case, they will be incorporated into the SLAA.

SLAA Round 3

- 2.12 It is currently anticipated that Round 3 of the SLAA will be undertaken during Spring/Summer 2013. Round 3 considers those sites which are located outside the current settlement boundaries of the Six Main Settlements and Category 1 Villages, and will be informed by the broad locations identified for development in the Draft District Plan: Part 1. Additional sites within the development boundaries of the Six Main Settlements and Category 1 Villages will also be assessed. The SLAA technical study report will then be updated and re-published.

Housing Requirement

- 2.13 The SLAA is an important piece of technical work because it informs housing supply in respect of meeting the District housing requirement or target. This target is currently set by the East of England Plan, but in light of its impending abolition, it is the responsibility of East Herts Council to generate its own housing target. This will be set out in the District Plan and must be based on an assessment of objectively assessed needs.
- 2.14 However, it should be noted that the District Plan will not allocate land to meet the full housing requirement. Instead, it will meet a 'to-find figure'. This is the residual number of homes that need to be delivered having taken account of other components of supply including the number of new homes built (known as housing completions) from the start of the plan period to point of adoption, taking account of any shortfall, and an allowance for the number of homes that will come forward from windfall sites (see below).

Windfall Analysis

- 2.15 Windfall sites are sites which have not been specifically identified or allocated as available for development in the Local Plan / District Plan. They are those sites which unexpectedly become available for development because an application for planning permission is granted.
- 2.16 Once granted, in accordance with the NPPF, windfall sites can be counted in the five year supply of housing land. Detailed analysis of windfall development is included within the SLAA Technical Study which is available as a background paper at www.eastherts.gov.uk/slaa.

2.17 Windfall sites usually comprise those sites which are difficult to predict whether they might come forward for development, such as small sites, conversions and changes of use (e.g. flats above shops). Windfalls also usually come forward on previously developed or brownfield land but importantly, should not include residential gardens. In East Herts, the following types of windfall development have been identified:

- . Conversions - change of use of the existing building to residential
- . Non-residential Brownfield Redevelopment - demolition of a building and erection of dwellings on land
- . Residential Brownfield Redevelopment - demolition of dwelling/s and erection of additional dwellings
- . Garden Land Development - erection of dwelling/s on greenfield residential garden land also known as 'backland' development
- . Greenfield Development - erection of additional dwelling/s
- . Replacement Dwellings - demolition and erection of replacement dwelling/s with no net increase

2.18 Using the size thresholds in the Local Plan, windfall sites can further be split between small (four or less) and large sites (five or more).

2.19 The breakdown by windfall type and site size is set out in Figures 3a and 3b below. As can be seen, completions have totalled 1,273 over the five year period. The East Herts Local Plan 2007 assumed that 160 dwellings would be delivered through windfalls per annum, equating to 800 over a five year period. Thus, windfall completions have been 59% higher than expected.

Figure 3a: Completions by Windfall Type on Small Sites

	07/08	08/09	09/10	10/11	11/12	Total	Annual Average
Conversions	17	39	22	36	18	132	26
Non-residential Brownfield	15	37	13	30	7	102	20
Residential Brownfield	20	19	12	0	7	58	12
Garden Land	13	23	15	27	16	94	19
Greenfield Development	1	3	3	3	7	17	3
Replacement Dwellings	1	-6	4	0	3	2	0

Figure 3b: Completions by Windfall Type on Large Sites

	07/08	08/09	09/10	10/11	11/12	Total	Annual Average
Conversions	30	47	13	23	38	151	30
Non-residential Brownfield	113	265	88	30	89	585	117
Residential Brownfield	11	12	34	-55	41	43	9
Garden Land	26	23	0	9	4	62	12
Greenfield Development	0	23	8	0	1	32	6

By definition, replacement dwellings do not contribute to the supply of additional homes and are monitored only because they represent a 'loss' in one year followed by a 'gain' a subsequent year. They also only comprise small sites.

- 2.20 Indeed, since 2001 windfalls have accounted for a significant proportion (54%) of net completions in East Herts.
- 2.21 However, it would not be appropriate simply to roll forward this level of development as a windfall allowance to 2031, for the following two reasons.
- 2.22 Firstly, the presence of the SLAA means that some windfall sites have been identified in the SLAA (and are therefore no longer windfalls, by virtue of the fact that they have already been identified). Including them as windfalls would result in double counting. In particular, it is considered reasonable to conclude that the SLAA will identify non-residential brownfield land and greenfield land opportunities on large sites whereas, on all of the other types of windfall site, identifying which ones may come forward for development is difficult

- 2.23 Secondly, whilst the NPPF permits dwellings built on residential garden land can be counted as windfalls for monitoring purposes, they cannot be included in any windfall allowance¹. Notwithstanding this, whilst residential garden land is no longer considered to be brownfield, residential dwellings are. Thus, any dwellings constructed on the *footprint* of the existing dwelling or dwellings can still be counted as part of the windfall allowance.
- 2.24 Taking the above into account, based on Figures 3a and 3b above, 773 dwellings (94+585+62+32) should be deducted from the total windfall completions of 1,273 for the five year period 2007/08 to 2011/12. This represents a reduction of 61%. Compared with the assumed windfall supply of 800 in the Local Plan 2007 over the same period, the reduced rates represent 97%.
- 2.25 Looking forward, in terms of commitments, it is expected that over the next four years, a total of 1,035 dwellings will come forward as windfalls (see Figure 4). Similarly to the level of completions, this rate of commitments is 62% above the Local Plan assumptions.

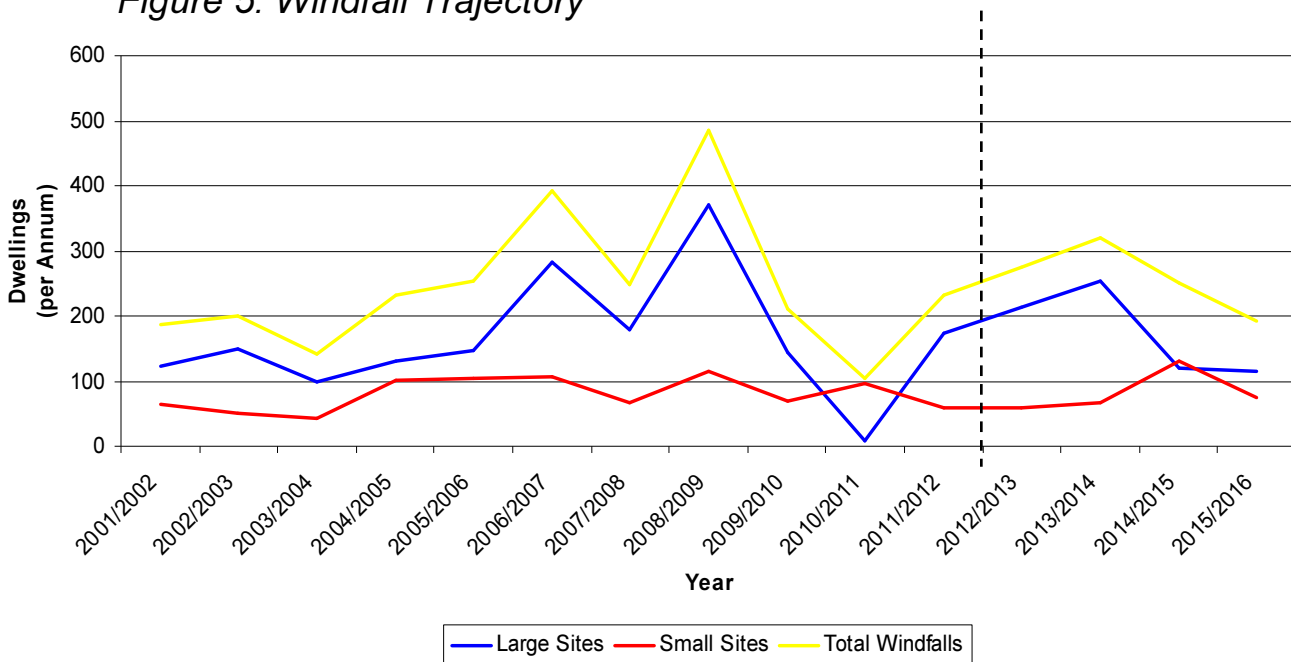
Figure 4: Windfall Commitments

	2012/13	2013/14	2014/15	2015/16	Total	4 Year Average
Small Windfall Sites	214	253	121	116	704	176
Large Windfall Sites	60	66	130	75	331	83
Total	274	319	251	191	1,035	259

- 2.26 In terms of formulating a windfall allowance for the District Plan, the starting point must be existing commitments of 1,035 (annual average of 259). However, this figure needs to be reduced by 61% to avoid including garden land and double counting with those sites identified in the SLAA (259x39% = 101). As such, it is considered reasonable to assume an annual windfall allowance of 100 dwellings for the District Plan.
- 2.27 Notwithstanding the above, it is also important to consider the trends in respect of windfall as expressed graphically in the windfall trajectory shown in Figure 5. This includes expected likely

commitments 2012/13 to 2015/16 (although excludes the reductions outlined above).

Figure 5: Windfall Trajectory



2.28 Windfalls seem to reflect the wider economic climate and there is a general upward trend. However, the trajectory does suggest that the supply of windfalls will decrease in the future (which is sensible since windfalls are a finite supply as opportunities for redevelopment, conversion and infill become more limited over time). In order not to over-estimate the potential supply from windfalls, it is considered appropriate to apply a percentage reduction to the average annual windfall allowance of 100 dwellings. Furthermore, it is also considered reasonable that because the District Plan runs for twenty years to 2031, that the reduction should be increased over time (see Figure 6).

Figure 6: Windfall Reduction

Years	Reduction	Annual Allowance	5 Year Total
1 - 5	0%	100	500
6 - 10	10%	90	450
11 - 15	20%	80	400
15 - 20	30%	70	350
Total			1,700

Please note: the windfall allowance for years 1-5 does not match the level of commitments. This is because the commitments include windfalls on residential garden land and sites that would be identified in the SLAA.

Conclusions

2.29 In summary, this report seeks Members agreement that the following figures be used to inform the preparation of the District Plan:

- SLAA allowance – 2,350 homes
- Windfall allowance - 1,700 homes

2.30 In terms of the SLAA allowance, it should be noted that the number of homes identified on each site is purely indicative and represents what Officers consider to be realistic based on the information available for the purposes of the SLAA. The number is neither a maximum nor a minimum and is simply a guide as to what may be appropriate. The number quoted could both increase and decrease, subject to the type of scheme that is proposed, the appropriateness of which will be determined through a planning application.

2.31 In respect of windfalls, consideration will also need to be given to the planning policy context within which windfalls will come forward. Currently, in accordance with the Local Plan 2007 infill development (i.e. up to five small dwellings) is permitted in principle within the built-up areas of the Six Main Settlements and Category 1 and 2 Villages. Should the emerging District Plan propose an alternative approach, either in respect of the principle of infill development or the locations within which such development is permitted in principle, this may have a knock-on effect on the supply of dwellings from windfall development.

2.32 As of October 2012, the development strategy in the District Plan has not been finalised. As such, the approach to setting an appropriate windfall allowance may need to be revisited in subsequent versions of the SLAA Technical Report.

3.0 Implications/Consultations

3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

The following background papers are available electronically at www.eastherts.gov.uk/slaa. A hard copy is also available to view at the Council's Offices in Hertford.

- SLAA Technical Study: Initial Report - Rounds 1 and 2 (October 2012)
- Initial Site Assessments (April/May 2012)
- Final Site Assessments (September/October 2012)

LDF Executive Panel Reports:

- Report to District planning Executive Panel 26th July 2012 Agenda Item 7: Strategic Land Availability Assessment (SLAA) - Round 2 Update Report
<http://online.eastherts.gov.uk/moderngov/documents/s15481/Strategic%20Land%20Availability%20Assessment.pdf>
- Report to LDF Executive Panel – 29th March 2012 Agenda Item 8: Strategic Land Availability Assessment (SLAA) Progress
<http://online.eastherts.gov.uk/moderngov/ieListDocuments.aspx?Clid=151&MId=2024&Ver=4>
- Report to LDF Executive Panel – 24th November 2011 Agenda Item 5: Strategic Land Availability Assessment (SLAA) Next Steps
<http://online.eastherts.gov.uk/moderngov/ieListDocuments.aspx?Clid=151&MId=1928&Ver=4>

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¹ NPPF paragraph 48 (DCLG, March 2012)

ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>People This priority focuses on enhancing the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable.</p> <p>Place This priority focuses on the standard of the built environment and our neighbourhoods and ensuring our towns and villages are safe and clean.</p> <p>Prosperity This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic and social opportunities.</p>
Consultation:	A period of stakeholder engagement has been carried out in order to inform the preparation of the final SLAA site assessments.
Legal:	N/A
Financial:	District Plan technical work is being funded from the Planning Policy/LDF Upkeep Budgets.
Human Resource:	Existing Planning Policy staff resources are being used to undertake this technical study.
Risk Management:	In order to be found sound at examination, it is essential that the District Plan should be based on a robust evidence base, of which the SLAA forms a key part.

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SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

ESSENTIAL REFERENCE PAPER 'B'

Site 01/005: Works, Southmill Road, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
EHDC Environmental Health	Local - Contaminated Land	Record of previous industrial use and use as allotment gardens.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Conclusion	We question the conclusions drawn for this plot. There is a dire need for employment in the town and this site employs significant numbers of people. Whilst the building of 35 family houses may indeed be possible, it is not desirable nor is it needed. The actual and potential employment generation of the site should over-ride further housing development, within the overall development of the town.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing; not to consider what it's most appropriate use may be. Although the SLAA concludes that the site is suitable for housing, it may also be suitable for employment uses.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/009: Land to the rear of 37-57 Haymeads Lane, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as residential. Record of previously being hospital grounds. Amber rating.	Agreed.	Insert text in assessment comments and change assessment rating from GREEN to AMBER.
Bishop's Stortford Civic Federation	Availability – Ownership; Availability – Ownership Intentions; Conclusion;	<p>We can update the Council regarding “amber” scores with regard to land assembly. The site behind nos. 37-57 Haymeads Lane has been put forward by a developer who owns a very small portion of the proposed site. The majority of other owners do not wish to sell their land for development. The Report's Conclusion/Assessment states this land should be considered 'unavailable' and 'it is not considered there is a reasonable prospect of development coming forward on the site within the plan period'.</p> <p>There is a great potential for dispute between the numerous landowners concerned with this site and the likelihood that EHDC could get drawn into this through the planning process with consequent costs risks to the Council. This site should therefore not be included due to the large number of landowners, their lack of consensus on development and hence the site's inability ever to become available for development and thus we agree with the Conclusion – it is not deliverable. It should be removed from consideration.</p>	Partly agreed. Difficulties of availability and achievability are stated in the conclusion. However, site will remain in the SLAA with a zero capacity, and will be re-assessed as part of the annual update of the SLAA.	Update text in assessment comments for Availability – Ownership to reflect partial ownership known due to multiple ownership of the land. Change assessment rating from GREEN to AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/012: Apton Road Car Park, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently in use as a car park. Record of previously being a school. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Conclusion	We fully support your conclusions that this be retained "as is" and that development is inappropriate. It should be removed from further consideration.	Noted. However, site will remain in the SLAA with a zero capacity, and will be re-assessed as part of the annual update of the SLAA.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/013: Reserve Secondary School Site, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Property & Technology	Conclusion – Assessment of site suitability	After 'additional school capacity to' wording should say 'another/other location(s) within the school planning area'. The words 'in the town' should be deleted.	Agreed.	Insert text in assessment comments. No change to overall assessment of site suitability.
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Agreed.	Insert text in assessment comments. No change to GREEN assessment rating.
Bishop's Stortford Civic Federation	Conclusion	You will know that the Civic Federation has strong feelings with regard to this site and its designation as a site for additional secondary school places should such be deemed necessary. As such, we support your conclusion that it is not achievable and question the deliverable of 250 dwellings, given the other considerations such as access, transport congestion and pollution.	Noted. Conclusion states that development currently considered unachievable due to the unresolved secondary school capacity issues in the school planning area. However, the recent Planning Inspector's report concluded that the site was suitable for residential development if this issue were to be resolved. Other considerations were not considered to be an overall constraint on residential development.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/028: Council Offices & land at The Causeway, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently in use as a car park. Record of previous commercial use in the western section. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Conclusion	We note your observations that this is unlikely to come forward for redevelopment until years 6 to 10. You will know of our opposition that it be developed. We believe the proposals (and the process) to be wrong and maintain our stance of opposition.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/031: Oxford House, London Road, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Conclusion	We believe there is great potential within the site for appropriate development of medical and related facilities to benefit the town. As such, we support the inclusion of this site but question the deliverability of 6 family dwellings as this site should remain in employment and, we suggest, medical use.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing; not to consider what it's most appropriate use may be. Although the SLAA concludes that the site is suitable for housing, it may also be suitable for employment uses.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/032: Bishop's Stortford Delivery Office & Post Office, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Conclusion	We support the conclusion that this vital site for the town be retained in current use and, again, question the deliverability of 25 dwellings, given the need for employment and the specific services offered within this site. We appreciate however that decisions regarding Post Office activity is out with any control exerted by EHDC.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing; not to consider what it's most appropriate use may be. Although the SLAA concludes that the site is suitable for housing, it may also be suitable for employment uses.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/037: 9 Dolphin Way, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as residential. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Conclusion	We support the conclusion that development of this site, especially in view of the flood plain, is inappropriate and recommend that this be removed from consideration.	Noted. However, site will remain in the SLAA with a zero capacity, and will be re-assessed as part of the annual update of the SLAA.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/065: Former Lancaster Garage Site, London Road, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Site – Access Standards	It is stated that access is acceptable and minor highway work is required. We are concerned that this assertion is flawed as several local studies have shown that there would need to be major work undertaken to try to make the site properly accessible from London Road especially if a major retail use were planned. You will know of our ongoing concerns regarding traffic congestion and pollution in the town.	Disagree. The extant planning permission for the site indicates that vehicular access to the site will be from a reconfigured access to London Road. This is not considered to be major work in highways terms. The Local Highway Authority raised no objection to the extant planning permission and considered that there would not be a significant increase in traffic generation when compared against the previous commercial use of the site.	No change to GREEN assessment rating. However, SLAA site assessment criteria amended to introduce greater clarity to traffic light assessment.
Bishop's Stortford Civic Federation	Conclusion	We believe that the conclusions are ill considered, per se, but especially when such traffic generating use be proposed. However, we fully recognise the dilemma that this is an eye sore and of no use to the town. Our proposal is that this site be considered in conjunction with the Goods Yard site (01/120) and a common plan be developed for both site, as was agreed by the Vision 2020 task group.	Noted, but comment not relevant to the SLAA. Such a proposal is a policy matter for the District Plan which will outline the overall development strategy for Bishop's Stortford until 2031.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/119: The Mill Site, Dane Street, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. Record of various previous commercial uses. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Conclusion	It is clear that there has been poor communication between EHDC and the site owners, Associated British Foods. This pivotal site for the town needs a more coherent approach to if and how it be developed. As such, we recommend that in depth, exploratory discussions take place with ABF at the earliest opportunity.	Noted. Whilst not an issue for the SLAA, the Council published a Development Brief for the site in December 2010, through the 2020 Vision Group,	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/120: The Goods Yard, Station Road, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
EHDC Environmental Health	Contaminated Land	Record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	General Comment	You will know of our redrafted suggestions for this vital site. We remain concerned that EHDC is not proactive enough for this site and the surrounding linked sites. We urge that a Master Plan be undertaken.	Noted. Whilst not an issue for the SLAA, the Council published a revised Development Brief for the site in July 2011, through the 2020 Vision Group.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/141: 3a South Street & The Dells, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Cllr Gary Jones	Conclusion	Site has existing planning permission and I would have expected to see it come forward in the next 5 years, rather than 6-10 years.	Agreed.	Deliverability conclusion amended from 6-10 years to 0-5 years.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as mixed residential and commercial. Record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	General Comment	Beyond the needs to ensure that any development be within the umbrella of a Master Plan, we have no further observations regarding this site.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/143: South Road Nurseries, South Road, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous use as a nursery. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	Local - Employment	There has been controversy around the development of this site. We regret that the observation under Local Policy – Employment, that there should be a presumption against loss of employment has been lost within the housing development proposals now being presented. We would urge that this presumption be reinforced and followed.	Noted. However, site has received planning permission for residential redevelopment. The issue of loss of employment has been considered within the context of the planning application.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/144: Land at Jeans Lane, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as mixed residential and commercial. Record of previous industrial use and use as allotment gardens. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	General Comment	There is not unanimity within the Civic Federation regarding this site. We would wish however to retain an element of employment within the site, if the mixed use development were able to proceed.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/146: 71-77 South Street, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	General Comment	Again this is a site that would benefit from the existence of a Master Plan. It is clear that current proposals are unlikely to succeed. We urge EHDC to bring this site within the considerations of the Goods Yard so that coherent use can be made of the two sites (three if 01/065 be attached) and the opportunity to redevelop an agreed eyesore is taken but in the context of greater coherence for the Goods Yard and the Lancaster Garage site. In this way, it is likely that a Preferred Developer could make the economics of the whole enlarged site work.	Noted, but comment not relevant to the SLAA. Such a proposal is a policy matter for the District Plan which will outline the overall development strategy for Bishop's Stortford until 2031.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/151: Former Fyfe Wilson Site, Station Road, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Bishop's Stortford Civic Federation	General Comment	We question the assertion regarding deliverables but again stress the inappropriateness of this vital site not being taken as part of the Goods Yard and related development. Again, it is an example of the piecemeal approach to redeveloping our town that has given rise to the failures we can see and the congestion to which we are subjected. We urge that this site be bracketed with the sites alongside, to ensure greater coherence.	Noted, but comment not relevant to the SLAA. Such a proposal is a policy matter for the District Plan which will outline the overall development strategy for Bishop's Stortford until 2031.	No change.
Jane Orsborn	Availability – Ownership	Jersey based company called Gradan Ltd purchased the site in 2009. I have not had any recent contact with them but as far as I am aware, they still own it.	Noted. However, as the site has recently been marketed it is unclear whether ownership has changed.	No change.
Jane Orsborn	Site – Neighbouring Uses	I note that there are new owners of the former Lancaster garage site (01/065) which adjoins Fyfe Wilson, who are promoting an entirely retail scheme. In the event that were to prove successful, it may be that my clients' site would no longer be considered suitable for residential development. In my opinion it might be better to apply your conclusions with regard to the former Lancaster Garage site to the former Fyfe Wilson site as well.	Disagree. The adjacent site was considered suitable for a mixed use redevelopment scheme, as evidenced in the extant approved application. There is not considered to be a conflict between retail and residential uses in this town centre location. The site is considered suitable for residential development.	No change.
Jane Orsborn	Conclusion	I am the agent for the extant application (3/10/0941/FN) for renewal of the planning permission (3/04/1360/FP) originally granted on appeal in July 2005 for erection of 42 apartments (22 x 1 bedroom; 18 x 2 bedrooms and 2 x 3 bedrooms) on this site and	Note comments on viability but disagree that site will not be developable within the plan period.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
		<p>for the application (3/10/0942/LC) to renew Conservation Area Consent for demolition of all of the existing structures.</p> <p>These applications for renewal stalled when requests were made for very high financial contributions (in excess of £100,000) and for 40% affordable housing. The permission granted on appeal was based on 30% of the units (13 units) being provided as affordable housing and a financial contribution being made of £22,000 towards essential infrastructure (primarily public transport).</p> <p>Given the surfeit of flatted development in the town centre, the applicants already had concerns about the viability of the previously proposed scheme when the applications to renew it were lodged in July 2010. These requests for considerably increased contributions have ensured that nothing further has happened on the site and I have no doubt that Gradan will not be bringing forward a residential redevelopment. The site will be particularly expensive to develop because of the costs involved in demolishing the existing buildings and also of constructing so close to the railway line. A national developer looked at it a couple of years ago but did not pursue an interest.</p> <p>I therefore do not think that it is wise to even include this site in Years 6-10 for 42 residential units. I recommend that it be re-assessed to RED.</p>		

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/155: Pearse House, Parsonage Lane, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Bishop's Stortford Civic Federation	General Comment	We recognise the dilemma of Pearse House and regret its apparent commercial failure. We urge that continuing employment use be stressed but also recognise the funding imperative. The risk is of over development: we shall be watching planning permission requests closely with regard to this site.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/156: Archers PH, 81 Havers Lane, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Bishop's Stortford Civic Federation	General Comment	Other than to bemoan the loss of yet another public house in the town, we have no direct observations with regard to this site.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 01/157: Sports Field associated with Birchwood High School, Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Property & Technology	Conclusion – Assessment of site availability	There is a legal obligation for Birchwood High School to obtain approval from the Secretary of State for Education for any disposal, along with a requirement for the school to consult with the Local Education Authority to see if the LEA has a use for the land and would wish to acquire it for alternative purposes relating to education.	Noted.	Insert text in assessment of site availability. Conclusion changed from site considered to be available to site being considered unavailable.
Bishop's Stortford Civic Federation	Conclusion – Assessment of site suitability	We do not consider that this site is suitable for development and urge that it be removed. Development of this site would go against the test for sustainable development within the NPPF but it would also be against Natural England's guidelines for access to open space for all, specifically within 300 metres of housing. Loss of this site would – as you have identified – entail a loss of biodiversity, a loss of amenity and also add to the appalling congestion already evident along Dunmow Road.	Disagree. It is considered that the northern part of the site is suitable for residential development. However, the site is not currently considered available for development, due to the existing policy designation on the site.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Other sites in Bishop's Stortford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Jane Orsborn	General comment	Suggestions of additional sites to be assessed at Round 2 of the SLAA.	Noted. These sites will be assessed as part of an update of Round 2 of the SLAA, to be carried out alongside Round 3. Sites would also be assessed as part of the annual update of the SLAA.	n/a

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 02/003: Land off Longmead, Buntingford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Buntingford Town Council	General Comment	The Council is in agreement with the assessment, but notes that despite several amber ratings, planning permission was granted on this land, effectively taking it out of the consultation process.	Noted. Amber ratings highlight where a particular issue may affect a site from coming forward for development. However, they do not preclude development as constraints can be mitigated against.	No change.
EHDC Environmental Health	Local - Contaminated Land	Current use unidentified. Amber rating.	Noted. Site is a greenfield site and there is no evidence of previous development. Therefore site is unlikely to be contaminated and the GREEN assessment rating should remain.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 02/010: Land to the south of Baldock Road, Buntingford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Buntingford Town Council	General Comment	The Council is in agreement with the assessment, but notes that despite several amber ratings, planning permission was granted on this land, effectively taking it out of the consultation process.	Noted. Amber ratings highlight where a particular issue may affect a site from coming forward for development. However, they do not preclude development as constraints can be mitigated against.	No change.
EHDC Environmental Health	Local - Contaminated Land	Current use unidentified. Amber rating.	Noted. Site is a greenfield site and there is no evidence of previous development. Therefore site is unlikely to be contaminated and the GREEN assessment rating should remain.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 02/037: Nevetts, Bowling Green Lane, Buntingford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Buntingford Town Council	Availability - Ownership	We believe the land is owned by Quantum Care.	Noted. Site is operated by Quantum Care on behalf of Hertfordshire County Council.	No change.
Buntingford Town Council	Local - Leisure, Recreation & Community	It is considered that this assessment should be amber as we believe that this site is designated for community use under Policy LRC11.	Disagree. Site is in use as a residential care home which is not considered to be a community use per se.	No change.
Hertfordshire County Council Property & Technology	Availability – Ownership	This site is owned by Hertfordshire County Council. It is a residential care home operated on behalf of Hertfordshire County Council.	Noted.	Update text in assessment comments and change assessment rating from RED to GREEN.
Hertfordshire County Council Property & Technology	Local – Employment	The site is a Residential Institution (Class C2 of the Use Classes Order) not an employment site.	Noted. However, due to the use of the site, it provides local employment opportunities which the Council would not wish to see lost as they support sustainable development.	No change.
Hertfordshire County Council Property & Technology	Conclusion – Assessment of site availability	The site is not privately owned it is in Hertfordshire County Council ownership.	Noted.	Update text in assessment of site availability. No change to overall assessment of site availability.
Hertfordshire County Council Property & Technology	Conclusion – Assessment of site suitability	The site is a residential care home not an employment site. It would therefore not have to be marketed as such.	Agreed.	Update text in assessment of site suitability. No change to overall assessment of site suitability.
Hertfordshire County Council Property & Technology	Conclusion – Assessment of site achievability	This site could come forward for development if the care home were to be re-provided elsewhere in the town. A suitable site would need to be identified. If this were the case all employees would be transferred to the new site and there would be no loss of	Agreed.	Update text in assessment of site achievability. No change to overall assessment of site achievability.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
		employment.		
Hertfordshire County Council Passenger Transport	Access - Buses	Distance of 600 metres and does not meet accessibility criteria. Accordingly traffic lights will need to be amended.	Noted.	Update text in assessment comments and change assessment rating from GREEN to RED.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Jane Orsborn	Conclusion	Given the ageing population and the fact that this is a relatively recent building, I think it should be kept as a care home. It also occupies a very good location, a short flat walk into the High Street, to fulfil such a role. I do not think its redevelopment for housing should be countenanced, even in the longer term. I therefore consider it should be rated RED.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing; not to consider what it's most appropriate use may be. Although the SLAA concludes that the site is suitable for housing, it is also considered suitable for specialist residential uses.	Update text in assessment of site suitability. No change to overall assessment of site suitability.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 02/045: Buntingford Fire Station, Station Road, Buntingford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Buntingford Town Council	Local - Leisure, Recreation & Community	It is considered that this assessment should be amber as we believe that this site is designated for community use under Policy LRC11.	Disagree. Site is in use as a Fire Station. Whilst it is acknowledged that a service is provided to the community, the site is not considered to be a community use per se.	No change.
Hertfordshire County Council Property & Technology	Availability – Ownership	This site is owned by Hertfordshire County Council.	Noted.	Update text in assessment comments and change assessment rating from RED to GREEN.
Hertfordshire County Council Property & Technology	Local – Employment	The site is not an employment site it is a fire station and therefore a <i>Sui Generis</i> use. It could only be developed if the existing uses were relocated to another site in the town. There would therefore be no loss of employment as existing employees would be transferred to the new site.	Noted. However, due to the use of the site, it provides local employment opportunities which the Council would not wish to see lost as they support sustainable development.	No change.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently in use as a Fire & Ambulance Station. Possible filled ground. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 02/046: The Railway PH, Station Road, Buntingford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Buntingford Town Council	General Comment	The Town Council agrees with the assessment but notes that despite amber constraints for contaminated land, employment land, access and community facility, planning permission was granted for this site at Officer level, despite objections from the Town Council and our District Councillor.	Noted. Amber ratings highlight where a particular issue may affect a site from coming forward for development. However, they do not preclude development as constraints can be mitigated against.	No change.
Buntingford Town Council	Conclusion – assessment of site suitability	It is stated that adequate marketing has been carried out to show that the continued use of the building for employment purposes has been considered not viable. The Town Council considers that this statement is inaccurate.	Noted. However, site has received planning permission for redevelopment. The issue of loss of employment has been considered within the context of the planning application.	No change.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Record of previous use as a Public House and Car Park. Adjacent to pre-industrial site. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

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Site 02/049: Watermill Industrial Estate, Buntingford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Buntingford Town Council	General Comment	The Council is in agreement with the assessment	Noted.	No change.
Hertfordshire County Council Passenger Transport	Access - Buses	Distance of between 300 to 700 metres to nearest stops. Accordingly part of the site will not meet accessibility criteria.	Noted.	Update text in assessment comments and change assessment rating from GREEN to AMBER.
EHDC Environmental Health	Contaminated Land	Currently in industrial use. Record of industrial use including tanks. Amber rating.	Agreed.	Insert text in assessment comments and change assessment rating from RED to AMBER.
Duncan Murdoch – Moulton Walker	Conclusion General Comment	<p>Our Clients object to any change from employment use of the Estate which is contiguous to our Client's land where we promote a proposal at Buntingford West to provide a 'Garden Suburb' for Buntingford. Our grounds for objection are solely that the Estate should remain wholly employment.</p> <p>1. The J Sainsbury depot is being proposed by that landowner for a major distribution depot, and thus will remain B8 use. Whilst that would be beneficial in providing local job opportunities, we believe it then especially requires other employment areas to focus on B1, and possibly B2 uses, so that in aggregate a range of employment activities can provide balance and sustainability.</p> <p>2. The Halcrow Group Ltd report of Oct 2008 referred to the Estate and they rated it 'amber'. The introduction (6.1 of p.59) confirms: <i>"those where employment uses remain viable but intervention in the future may be required to retain employment uses (amber)"</i>. Page 67 of Halcrow stated: <i>"Watermill Industrial Estate</i></p>	Noted. However, site will remain in the SLAA with a zero capacity, and will be re-assessed as part of the annual update of the SLAA.	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
		<p><i>Watermill Industrial Estate benefits from its relative proximity to the A10 but the fact that it is located in the north of the District and consists of generally small, poor quality units meant that in terms of marketability it scores poorly. A few vacant units indicate demand could be stronger. Refurbishment of units would lead to improved image and perception. An application for a total of seven new B1 units has been recently approved by the council. Assessment: Amber.</i></p> <p>3. We observe from the SLAA list (p.588) that the site is proposed for mixed use development. We have examined the Land Registry certificate for the properties in this Estate, and find a conglomerate of disparate owners. The allocation of any part of the Estate for residential would not therefore achieve the necessary 'intervention' to make the balance of the Estate viable.</p> <p>4. Our Clients proposal at Buntingford West can enable a westward expansion of the Estate and provide a substantial improvement in its access. That would be meaningful 'intervention'. It should encourage those landowners to improve their assets.</p> <p>5. We recommend the site of the Estate continues to be exclusively Employment and ask therefore that it be deleted from the SLAA.</p>		

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Site 02/051: Park Farm Industrial Estate Extension, Buntingford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Buntingford Town Council	General Comment	The Council is in agreement with the assessment.	Noted.	No change.
Hertfordshire County Council Passenger Transport	Access - Buses	Distance of 850 metres and does not meet accessibility criteria. Accordingly traffic lights will need to be amended.	Noted.	Update text in assessment comments and change assessment rating from GREEN to RED.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.

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Site 03/002: National Grid Site/Norbury Woodyard, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Passenger Transport	Access - Buses	Distance is over 800 metres and does not meet criteria. Accordingly traffic lights will need to be amended.	Noted.	Update text in assessment comments and change assessment rating from GREEN to RED.
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
EHDC Environmental Health	Local - Contaminated Land	Currently in a number of industrial uses. Record of landfill and gas works. Amber rating.	Disagree. Site is currently undergoing remediation works for the previous industrial uses on the site. Therefore the RED assessment rating should remain.	Update text in assessment comments. No change to RED assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/007: The Old Orchard, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently an orchard. Amber rating.	Disagree. Site is a greenfield site and there is no evidence of previous development. Therefore site is unlikely to be contaminated and should be given a GREEN assessment rating.	Insert text in assessment comments. Assessment rating given as GREEN.

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Site 03/008: Hertfordshire Fire Station & Fire Service HQ, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Property & Technology	Local Policy - Employment	The site is not an employment site it is a fire station and therefore a <i>Sui Generis</i> use. It could only be developed if the fire station was relocated to another site in the town and the fire HQ to another site within the county. There would therefore be no loss of employment as existing employees would be transferred to the new sites.	Noted. However, due to the use of the site, it provides local employment opportunities which the Council would not wish to see lost as they support sustainable development.	No change.
Hertfordshire County Council Passenger Transport	Access - Buses	Stops are located on Tesco, Mill Road/Ware Road and not Park Road.	Noted.	Update text in assessment comments. No change to GREEN assessment rating.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently in use as a Fire & Ambulance Station. Green rating.	Disagree. Site comprises previously developed land. Whilst there is no evidence of the site being contaminated, the AMBER assessment rating should remain.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/009: West Street Allotments, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently in use as allotments. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/012: 13-19 Castle Mead Gardens, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertford Town Council	Availability – Use & Local - Employment	The criteria types Availability – Use and Local Policy – Employment appeared contradictory. Land currently in residential occupation, but site designated as an Employment Area.	Agreed. Although the site is washed over by an Employment Area designation and should therefore be reserved for employment uses, it is acknowledged that the actual site is in residential use. Given this existing use, it is not considered that this site needs to be retained for employment purposes.	Update text in assessment comments for Local – Employment and change assessment rating from RED to GREEN.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as residential. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Steven Barker, Barker Parry Town Planning	Availability – Use & Local Policy - Employment	The site attracts a 'Red' owing to it being in residential use and a 'Red' owing to its employment allocation. That is a somewhat contradictory position. As a matter of fact, the site is in residential use comprising a terrace of housing and its residential curtilage and notwithstanding the fact that, for some reason, it is washed over by an employment designation its continuing residential use by way of re-development would not result in any loss or displacement of employment floorspace. This notwithstanding, the existing designation must surely be a candidate for review and it is a policy matter as distinct from whether the site is available and deliverable, The site should only be discounted from a SLAA when a decision has been taken on employment allocations.	Agreed. Although the site is washed over by an Employment Area designation and should therefore be reserved for employment uses, it is acknowledged that the actual site is in residential use. Given this existing use, it is not considered that this site needs to be retained for employment purposes. The existing designation will be reviewed as part of the formulation of the District	Update text in assessment comments for Local – Employment and change assessment rating from RED to GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
			Plan.	
Steven Barker, Barker Parry Town Planning	Availability - Use	The fact that the existing houses are occupied appears to count against the selection of the site. Again this contradicts the employment point, but it is not at all unusual for older areas of housing to be identified as potential housing regeneration sites. In this case as you have indicated in your assessment the site is suited to higher density residential development so there would be a net increase in units. The fact that the existing houses are occupied cannot reasonably be justification for rejecting a sustainably located brownfield site from a SLAA exercise.	Disagree. The fact that the existing houses are occupied does not mean that the site is rejected from the SLAA. However, it is taken into consideration as part of the assessment of site availability and therefore site achievability, and provides a basis on which to draw conclusions as to whether the site is deliverable or developable within the plan period.	No change.
Steven Barker, Barker Parry Town Planning	Conclusion – Assessment of site suitability	With regard to Flood Zone 3, I would refer you to our assessment of the 7th October last. Certainly the site should not be rejected in the absence of evidence relating to sequentially preferable sites. These comments are obviously site specific but their applicability is general to the assessment process.	Noted and agreed that site should not be rejected in the absence of evidence relating to sequentially preferable sites. However, current evidence shows that the site lies within Flood Zone 3 and it is therefore considered unsuitable for intensification of residential development.	Update text in assessment of site suitability. No change to overall assessment of site suitability.

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Site 03/016: 1-14 Dicker Mill, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently in industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Tim Waller, JB Planning Associates Ltd	Availability – Use	The site is partly occupied, and its current vacancy rate is 47% of the floor area of the units. Its long-term prospects for accommodating employment development are limited, as noted in the accompanying report by Wisbey Goodsell, and Marchfield Properties expect, following their recent discussions with the tenants, that the vacancy rate will increase in the near future. There are no existing leases extending beyond April 2013.	Noted.	Update text in assessment comments. No change to RED assessment rating.
Tim Waller, JB Planning Associates Ltd	Local – Environmental Noise	As we have discussed with your colleagues, there are ways of avoiding any adverse impacts from noise, both through the incorporation of mitigation measures in the building design and materials, and also by placing B1 employment uses between the adjacent site and any residential element to the development. This would not be a constraint to the mixed use development we propose.	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Local – Heritage Conservation Area	The site is not within the Conservation Area but adjacent, and its redevelopment can have a positive effect on the setting of the Conservation Area. Architects Kirkland Fraser Moor have produced some initial drawings for the proposed mixed use development, and these have received a positive reception from your colleagues in pre-application	Noted.	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
		discussions. We intend to continue to work with the Council to produce a suitable design.		
Tim Waller, JB Planning Associates Ltd	Local – Policy Employment	<p>The current premises are in a poor condition, and in need of refurbishment. They are also around 50% vacant, and an extensive marketing exercise has failed to identify new tenants. There is also a limited market for these premises, and they have limited usefulness in terms of long-term employment generation. It is a long term desire of East Herts Council, as expressed through the draft Mead Lane Urban Design Framework, for the site to be redeveloped for modern employment premises. However, it would be uneconomic to redevelop this site for employment purposes, and so it would effectively never happen. The only way in which the site could conceivably be redeveloped would be for a residential-led mixed use development. The market housing element of the development would be the aspect which would generate the value to fund the redevelopment, including the provision of new, modern employment units, s106 financial contributions and affordable housing.</p> <p>We have received a letter from your colleagues in Development Control, dated 3rd April 2012, which noted: <i>'A mixed use scheme is contrary to the aims of Local Plan policy for designated employment areas but on the basis that an enhanced employment provision can be secured in this way as well as other improvements then it is a principle I am prepared to support. However the balance of provision should as far as possible be towards employment provision...'</i></p> <p>With this in mind, we are confident that an appropriate</p>	Noted.	Update text in assessment of site achievability to reflect comments on viability of a residential led mixed-use development scheme. No change to overall assessment of site achievability.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
		<p>balance between residential and employment uses can be achieved guided by an economic viability assessment.</p> <p>We also note that the Employment Land Review is now somewhat dated, and it did not consider these buildings in the level of detail this more recent report (Wisbey Goodsell report) has done.</p>		
Tim Waller, JB Planning Associates Ltd	Major - Flood Risk	<p>A detailed topographical survey of the site has confirmed that it is almost entirely within flood zone 1, with a low probability of flooding. A small section of the site is located within flood zone 2. Design can ensure that any development within this zone is appropriate development under the requirements of table 1 and table 2 of the Technical Guidance to the NPPF.</p> <p>However any site lying within flood zones 2 and 3 will trigger the EA to ask for demonstration of the Sequential test under NPPF. We are advised by WSP, who are based locally in Hertford, that any flood risk issues can be overcome. We are also confident that the site's sustainable location makes it entirely suitable for development and that the sequential test can be met.</p>	<p>Noted. However, current evidence shows that the site lies within Flood Zone 2 and fulfils the criteria for an AMBER rating. However, it is acknowledged that flood risk may not necessarily preclude development of a site since it is possible that mitigation measures could be implemented. Any further evidence will need to be submitted and considered by the Council and Environment Agency as part of any planning application for the site.</p>	No change.
Tim Waller, JB Planning Associates Ltd	Site – Access Other Sites	<p>With regard to the employment area to the east of this site, the occupants have a right of access across the site which would not be affected by the proposed development.</p>	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Site – Access Standards	<p>We have been advised by WSP, who carried out the Hertford and Ware Urban Transport Plan (UTP) for the Local Highway Authority (LHA) and EHC, and a detailed study of access options for the Mead Lane</p>	Noted.	Update text in assessment comments and change assessment rating from RED to AMBER to reflect

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
		<p>area, that any current access problems can be overcome. They identified through their work for the LHA and EHC that there were highway and transportation options which would overcome any capacity constraints from the Mill Road access, allowing development to begin in this area, and potentially also to provide forward funding through pooled s106 contributions across the Mead Lane area for further works to allow additional development to take place in the area. This approach was endorsed by both the LHA and EHC. They have noted that without some start to further development, it is unclear how a broader access solution for this area will be provided. They have also informed us that the Dicker Mill road bridge is perfectly adequate to support the proposed development.</p> <p>We agree with the approach to deliver a comprehensive and coordinated solution for access to the Mead Lane area. Our proposed approach to the development fully accords with this by providing a mixed use development that reduces reliance on the private car by making best use of the accessible location and by contributing towards a Mill Road access solution agreed with the LHA and EHC through the Hertford and Ware UTP. Latest highways policy and guidance, such as Manual for Streets, is less focused on a "heavy constraint" of a single point of access, rather it seeks to deliver solutions that balance site risks for all users and stakeholders. In the case of Mill Road the solutions within the UTP, to address the single point of access, included agreeing measures in consultation with the emergency services and transport operators as well as the local authorities.</p>		outstanding highways issues.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
Tim Waller, JB Planning Associates Ltd	Site – Character Existing Development	Architects Kirkland Fraser Moor have produced some initial drawings for the proposed mixed use development, and these have received a positive reception from your colleagues in pre-application discussions. We intend to continue to work with the Council to produce a suitable design.	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Site – Strategic Site	It is not currently proposed that this site should form part of a larger development, and there is no need for this to happen. We have already shown that the site can be suitably developed as it is, without any conflict with adjacent uses, and without preventing adjacent sites from coming forward for development separately in the future.	Noted. However, the Council has expressed its desire to see a comprehensive and co-ordinated approach to development in the area in the draft Mead Lane Urban Design Framework. Therefore the AMBER assessment should remain.	No change.
Tim Waller, JB Planning Associates Ltd	Conclusion – Assessment of site achievability	You have also commented that the residential aspect of a mixed use development may not be achievable in the current market. Marchfield Properties are a local developer, and they are pursuing this development because they believe quite the opposite, that it would be achievable in this market. There remains strong demand for housing, and the proposed design offers the possibility of providing more family-orientated housing, with suitable levels of accommodation and amenity areas and living space incorporated into the building(s) on site. Similarly, there may also be scope for some retirement apartments and/or start-up homes. The problems associated with the sale of other flatted schemes in Hertford are not expected to constrain the sale of these proposed apartments. We note the SHLAA assessment of the site clearly sets out the accessible location of the site close to the	Noted. However, it is still considered that given the current economic climate there may still be viability issues bringing the site forward for a mixed use scheme that has an appropriate balance between residential and employment uses in the early part of the plan period. In addition there are still considered to be outstanding technical constraints on the site which would need to be considered as part of any	Update text in assessment of site achievability. Deliverability conclusion amended from 11-15 years to 6-10 years.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
		<p>town centre and a range of passenger transport options and facilities. A mixed use development makes sustainable use of the site. The constraints can clearly be addressed and therefore the site should be included in the early years of the SHLAA land supply. We therefore disagree strongly with your proposed assessment that this site is likely to come forward for development in years 10-15. This site is available now, it is being promoted by a developer now, the principle of the proposed use has been accepted, and any technical issues have been investigated and it has been found they would not constrain a development. This site should therefore be included in the first 5 years of your SLAA.</p>	<p>planning application on the site.</p>	

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/017: 30-34 & 33-41 Chambers Street, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
EHDC Environmental Health	Local - Contaminated Land	Currently in industrial use. Record of tanks. Amber rating.	Agreed.	Insert text in assessment comments and change assessment rating from RED to AMBER.
Tim Waller, JB Planning Associates Ltd	Availability – Use	This site is currently occupied by employment uses, but Marchfield Properties agree with your assessment that the site has potential in the medium-term for redevelopment for residential use. The current uses are only short-term leases, which are due to expire shortly, and there is some uncertainty over whether the tenants will take up the offered extensions. Irrespective of this, Marchfield Properties believe that this site may be too constrained for modern employment uses in the long-term, and it would be more suited to a residential development.	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Local – Environmental AQMA	The site already generates activity and traffic use, which is arguably at a higher level, particularly given the current motor vehicle trade use, than would be the case for a residential development. A residential development here therefore has the potential to contribute to an overall improvement in local air quality.	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Local – Environmental Contaminated Land	There is no evidence that the site is contaminated, but if it were, this could be identified and then remediated prior to any development taking place. This would not be a constraint on the site's redevelopment, and this potential constraint should certainly not be rated as	Agreed.	Change assessment rating from RED to AMBER.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
		'red'.		
Tim Waller, JB Planning Associates Ltd	Local – Environmental Noise	It is not believed that current noise levels would be a constraint to a residential development, as suitable mitigation measures can be employed. We also note that the site is surrounded by other residential properties, including recent development, which has not been constrained by noise.	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Local – Heritage Area of Archaeological Significance	An archaeological assessment can best determine any archaeological significance on the site, but this would not prevent the site's redevelopment. A watching brief condition could be imposed on any planning permission to ensure that any heritage assets on the site are dealt with appropriately.	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Local – Heritage Conservation Area	We believe that the form of development currently on the site detracts from the character and appearance of the Conservation Area. We would expect a well-designed new residential development to make a far more positive contribution to the character of the area.	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Local – Policy Employment	The site is currently in employment use, but it is not expected to remain so in the medium-term. The site is also not designated for employment use. There is strong evidence that demand for employment land in Hertford is falling, and the local market is already oversupplied; at the same time, there is a very high level of need and demand for housing. This difference in levels of demand is borne out in the difference in local land prices for employment or residential developments, and we note that the NPPF recognises the significance of such market signals for plan making (see NPPF, paragraph 17). In the context of future development, which is the context in which the SLAA should assess the site, this is a suitable residential development opportunity.	Noted. However, the Council seeks to prevent the loss of sites in or previously in employment use in order to maintain a sufficient supply of employment land across the district. However, if it can be demonstrated that the site is no longer viable for non-residential uses, through adequate marketing over a reasonable period of time, the Council may consider	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
			relaxing the requirement for replacement employment provision to be provided on the site.	
Tim Waller, JB Planning Associates Ltd	Major – Environmental Flood Risk	The site is less constrained by flood risk than the SLAA has suggested, and it benefits from flood defence measures. Irrespective of this, the NPPF technical guidance considers residential development to be suitable on land within Flood Zone 2, and we are confident that a site in a town centre location such as this could pass the sequential test, if necessary.	Noted.	No change.
Tim Waller, JB Planning Associates Ltd	Conclusion	With regard to your further comments, we note that the site is expected to be available for redevelopment in the medium-term. It is entirely suitable for redevelopment, and a residential use would be compatible with the residential properties which surround the site. There are no known technical factors which would constrain the site's redevelopment. We support your conclusions that the site could accommodate up to 18 dwellings in years 6-10.	Noted.	No change.

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Site 03/020: Land at Braziers Field, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous use as allotment gardens. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/024: Hertford Delivery Office, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments and change assessment rating from GREEN to AMBER.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/100: Land opposite 343-381 Ware Road, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. Possible unknown filled ground. Amber rating.	Agreed.	Insert text in assessment comments and change assessment rating from RED to AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/101: Land west of Marshgate Drive, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as mixed residential and commercial. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/121: Hertford Industrial Estate, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major -Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments and change assessment rating from GREEN to AMBER.
EHDC Environmental Health	Local - Contaminated Land	Currently in industrial use. Possible unknown filled land. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
Jane Orsborn	Conclusion	I have no interest in this area other than as a resident of the town but the potential loss of such a large area of employment land is a considerable concern, especially in the absence of any proposals for additional new employment floor space locally. I note the comment about access issues but it was agreed at the SLAA Partnership meeting held in September 2011 in respect of Hertford that the Council would use its best endeavours to resolve the long standing issue of allowing these businesses to gain direct access to the A414 via John Tate Road on Foxholes, thus significantly reducing traffic on Ware Road and making this area much more attractive for employment use. I believe every effort should be made to achieve this. A potential allocation for housing, even in the latter part of the Plan period, will not focus attention on providing an improved access to serve employment generating premises. In terms of the availability of residential land, I therefore consider it should be assessed as RED.	Noted. The site is currently considered to be unavailable for development due to the existing uses present on the site and unachievable due to the Council's intention to retain the Employment Area designation on the site.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/125: Land to south of Mead Lane, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently part of railway station and sidings. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/132: Former Hertford & Ware Police Station, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous use as a school/workhouse. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/136: Adams Yard, Bull Plain, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/138: 15 Currie Street, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/139: 7 & 8 Bluecoats Avenue, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. Record of previous use as a school. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/140: Former Dolphin PH Car Park, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous use as a car park. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/141: 85 Railway Street, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous use as a garage. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/142: 87-89 Railway Street, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Previous use unidentified. Amber rating.	Agreed.	No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/143: 8, 10 & 12 Railway Street, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments and change assessment rating from GREEN to AMBER.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/144: 10-12 The Wash, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as mixed residential and commercial. Amber rating	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/145: Former Waters Garage Site, North Road, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertford Town Council	Conclusion - Deliverable	It was considered that the assessment for 14 dwellings on the site was not acceptable in density terms.	Disagree. A development density of around this level is considered to be acceptable in this central location, subject to appropriate design, massing and layout.	No change.
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/146: Beesons Yard, 72 Railway Street, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments and change assessment rating from GREEN to AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/147: Baker Street Car Park, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/148: Bentley House, Pegs Lane, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertford Town Council	Site – Access Standards	Assessment rating should be Amber. Major road improvements were considered necessary, not minor improvements.	Disagree. It is not considered that major road improvements would be necessary.	No change to GREEN assessment rating. However, SLAA site assessment criteria amended to introduce greater clarity to traffic light assessment.
Jane Orsborn	Conclusion	This is one of only a very few modern office buildings in the town and I believe should be retained for office use, irrespective of the fact that the current office market may be depressed. The October 2008 Employment Land Study recommended allocating Bentley House, together with the District and County Council offices as an employment area for offices. This area is well located to the town centre and is very suitable for office use. Additionally, I consider there is inadequate amenity space available for residential use. For these reasons I believe strongly that this site should be rated RED in terms of an assessment of the residential capacity of Hertford. See also comments below in respect of Elbert Wurlings, Pegs Lane.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing; not to consider what it's most appropriate use may be. Although the SLAA concludes that the site is suitable for housing, it may also be suitable for employment uses.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/149: Elbert Wurlings, Pegs Lane, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Jane Orsborn	Conclusion	This building is becoming run down in appearance and its less than attractive style makes it, in my view, a priority for redevelopment. I note the comment that a flatted development here is less likely to be viable if Bentley House is allowed to be converted to apartments which I'm sure is correct. This means that the priority should be to encourage residential redevelopment of Elbert Wurlings. Elbert Wurlings was not an employment site in the traditional sense and is certainly not comparable to Bentley House in terms of its employment generating potential. Its redevelopment for housing should not be delayed by yet further marketing, nor prejudiced by residential conversion of Bentley House.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 03/150: Grehan House, 57 Molewood Road, Hertford

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Passenger Transport	Access - Buses	Distance of 500 metres to buses. Accordingly traffic lights will need to be amended	Noted.	Update text in assessment comments and change assessment rating from GREEN to RED.
Jane Orsborn	Conclusion	Whilst an appeal in respect of residential redevelopment of this site was dismissed in November 2011, this was not on the grounds of flood risk. Indeed, the Inspector commented that "The risks that pertain in respect of flooding are not shown to be so serious as to outweigh the benefit of redevelopment for housing. As such, the proposal would not conflict with the flood protection aims of national policy contained in PPS25". Based on that appeal decision and pre-application advice (M/11/0025/03) there is developer interest in bringing forward an adjacent site (57 Molewood Rd) for a terrace of three town houses. I therefore consider that Grehan House should be assessed positively in terms of availability for housing; ie GREEN.	Noted. Site has now received planning permission for residential development.	Update text in assessment of site availability, suitability and achievability. Deliverability conclusion amended to 1-5 years.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 04/003: Land to the rear of 4 Newports, Sawbridgeworth

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Passenger Transport	Access - Buses	Distance is 800 metres and does not meet criteria. Accordingly traffic lights will need to be amended.	Noted.	Update text in assessment comments and change assessment rating from GREEN to RED.
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments and change assessment rating from GREEN to AMBER.
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 04/049: Fire Station & Club, Station Road, Sawbridgeworth

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Sawbridgeworth Town Council	Conclusion – Assessment of site availability	We stress that the site is unavailable due to its strategic use.	Noted.	No change.
Hertfordshire County Council Property & Technology	Availability – Ownership	The Fire Station site is owned by Hertfordshire County Council.	Noted.	Update text in assessment comments. No change to RED assessment rating as only partial ownership known.
Hertfordshire County Council Property & Technology	Local Policy - Employment	The site is not an employment site it is a fire station and therefore a <i>Sui Generis</i> use. It could only be developed if the existing use was relocated to another site in the town. There would therefore be no loss of employment as existing employees would be transferred to the new site.	Noted. However, due to the use of the site, it provides local employment opportunities which the Council would not wish to see lost as they support sustainable development.	No change.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. Record of various previous commercial uses. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 04/051: Telephone Exchange, off London Road, Sawbridgeworth

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Sawbridgeworth Town Council	Conclusion – Assessment of site availability	We stress that the site is unavailable due to its strategic use.	Noted.	No change.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 04/057: Sawbridgeworth Football Club, Crofters, Sawbridgeworth

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Sawbridgeworth Town Council	Conclusion – Assessment of site availability	We stress that the site is unavailable due to its current and continuing use as a key recreational facility.	Agreed. However, if recreational use is relocated elsewhere in/around the town, the site would become available for development.	No change.
Sawbridgeworth Town Council	Conclusion – Assessment of site achievability	Officer's comments concerning achievability are factually incorrect; the football club HAS implemented the recent planning permission to improve facilities at the site and the work is part complete and part on-going.	Disagree. The Council is of the opinion that this permission has lapsed. There is no record of any conditions associated with the permission having been discharged and the football club would have to provide evidence that the permission were implemented before the expiry date. Notwithstanding this, it is not considered that any development has taken place on the site as yet, which would prevent relocation of the existing sports facilities.	No change.
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments and change assessment rating from GREEN to AMBER.
EHDC Environmental	Local - Contaminated	Currently in use as sports pitches. No record of previous industrial use. Amber rating.	Disagree. Site is a greenfield site and there is	Insert text in assessment comments. No change to

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Health	Land		no evidence of previous development. Therefore site is unlikely to be contaminated and should keep a GREEN assessment rating.	GREEN assessment rating.
Jane Orsborn	Conclusion	I welcome recognition of the fact that replacement sports facilities are not likely to be provided in the short term, leading to assessment of this site as only available for housing in Years 6-10.	Noted.	No change.

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Site 04/059: The Market House, Knight Street, Sawbridgeworth

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.

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Site 05/007: Baldock Street Car Park, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Property & Technology	Availability - Ownership	East Herts are now the beneficial owner of this site as a 999 year lease has been granted by Hertfordshire County Council to EHDC (as at Apton Road, Bishop's Stortford).	Noted.	Update text in assessment comments. No change to GREEN assessment rating.
EHDC Environmental Health	Local - Contaminated Land	Currently in use as a car park. Record of previous commercial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

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Site 05/009: Land east of the Trinity Centre, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Passenger Transport	Access - Buses	Not included in assessment - Site within 400m of Tower Road stop and therefore within the acceptable accessibility threshold	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.
EHDC Environmental Health	Contaminated Land	Currently in use as playing fields. No record of previous industrial use. Amber rating.	Disagree. Site is a greenfield site and there is no evidence of previous development. Therefore site is unlikely to be contaminated and should keep a GREEN assessment rating.	Insert text in assessment comments. No change to GREEN assessment rating.

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Site 05/018: Cintel Site, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Passenger Transport	Access - Buses	Stops are located on Watton Road/Fanshaw Crescent and not Buryfield Way and Fanshaw Crescent	Noted.	Update text in assessment comments. No change to GREEN assessment rating.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. Record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 05/022: Swains Mill & land south of Crane Mead, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 05/036: 16 New Road, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. Record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 05/079: Star Street (Co-op Depot), Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 05/082: Mill Studios, north of Crane Mead, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 05/085: Land at London Road (adjacent to New River Court), Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Jane Orsborn	Major – Flood Risk	There have been lengthy negotiations with The EA to address flood risk issues which have now been shown not to be at a level to prejudice housing. It should therefore be assessed as GREEN.	Disagree. Site lies within Flood Zone 2 and fulfils the criteria for an AMBER rating. Amber ratings highlight where a particular issue may affect a site from coming forward for development. However, they do not preclude development as constraints can be mitigated against.	No change.
Jane Orsborn	Conclusion	This site is the subject of on going pre-application advice (M/11/0108/01) dated December 2011. It is now owned by a developer and the intention is to bring it forward for residential development imminently.	Noted.	Deliverability conclusion amended from 6-10 years to 0-5 years.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 05/086: Former Musley Infants School, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Passenger Transport	Access - Buses	Stops are located on Homefield Road and not King Edward Road.	Noted.	Update text in assessment comments. No change to GREEN assessment rating.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Record of previous use as a school. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. No change to AMBER assessment rating.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 05/087: 49-51 Star Street, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments. No change to RED assessment rating.

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Site 05/087: The Sun & Harrow PH, 34 Fanhams Road, Ware

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

General comment on sites in Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Major – Flood Risk	None of these sites are in the Parish of Stanstead Abbots — all are in a flood zone and in the view of the Cllrs, would not be suitable for development. Cllrs would wish to be satisfied that all risks of flooding have been taken into account if the development of any of these sites is considered further.	Noted. Where flood risk is considered to be a constraint on development, it has been highlighted in the site assessments. However, flood risk may not necessarily preclude development of a site since it is possible that mitigation measures could be implemented. The Council would seek further advice from the Environment Agency on all sites where flood risk has been assessed to be an issue.	No change.
Stanstead Abbots Parish Council	Conclusion – Assessment of site availability & achievability	Many of the sites are considered to be 'unavailable' or 'not achievable'; this does not seem to provide an assessment of realistic possible sites for development.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing and will be updated on an annual basis. Therefore these assessments may change in future iterations of the SLAA.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 23/003: Land north of Jansus, Amwell Lane, Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion – Assessment of site suitability	This is a Brownfield site but would not be considered suitable for development due to the risk of flooding.	Agreed.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Agreed.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 23/008: Land north of 19 Folly View, Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion – Assessment of site suitability	This site is considered to be too steep for development, parking would be a problem for the residents and this would represent the merging of the 2 parishes of Great Amwell and St Margarets.	Agree that the topography of the site would make the site unsuitable for development. The other issues are noted but are not considered to be issues for the SLAA.	No change.
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 23/016: Land between Amwell Lane & the New River, Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion – Assessment of site suitability	This site is considered to be too steep for development, parking would be a problem for the residents and this would represent the merging of the 2 parishes of Great Amwell and St Margarets.	Agree that the topography of the site would make the northern part of the site unsuitable for development. The other issues are noted but are not considered to be issues for the SLAA.	No change.
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 37/003: The Wilderness (land between Hoddesdon Road & the New River), Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion – Assessment of site suitability	Cllrs do not consider this land is suitable for residential development, as the residents would have a poor quality of life due to noise and traffic pollution. In addition there are Tree Preservation Orders on the trees.	Agree that the noise nuisance would make the southern part of the site unsuitable for development. TPO constraint has been recognised in the assessment by an AMBER rating.	No change.
Stanstead Abbots Parish Council	Conclusion	Cllrs would not support the development of this site and would prefer it to remain as a green space and a local amenity.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing; not to consider what it's most appropriate use may be. Although the SLAA concludes that the northern part of the site is suitable for housing, it may also be suitable for other uses.	No change.
EHDC Environmental Health	Local - Contaminated Land	Current use unidentified. Amber rating.	Noted. Site is a greenfield site and there is no evidence of previous development. Therefore site is unlikely to be contaminated.	Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 37/005: Land south of Sanville Gardens, Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion	Cllrs understood that this site had previously been put aside for a Community building, play equipment, or a Drs surgery. Cllrs would only support this use of the site	Disagree. These proposed land uses were included within the July 2000 development brief for the wider site. The community building/GP service use is to be provided on another part of the site covered by the development brief, whilst some play equipment has been provided on this site. Notwithstanding this, the SLAA concludes that the site is not suitable for housing.	No change.
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 37/011: Leaside Works, Lawrence Avenue, Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion	Cllrs consider it would not wish to loose this facility for local businesses; the site could be improved, rather than redeveloped with change of use.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing; not to consider what it's most appropriate use may be. Although the SLAA concludes that the site is suitable for housing, it may also be suitable for employment uses. Notwithstanding this, redevelopment of the site for residential uses is not considered achievable due to the landowners stated intentions for the site.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 37/013: Land between Lawrence Avenue & the River Lea, Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion	Ownership is unknown. This area is considered to be a local amenity, it is a pleasant area for a walk and residents would not wish to lose it.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing. Notwithstanding this, the SLAA concludes that the site is not suitable for housing.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently open space. No record of previous industrial use. Possible unknown filled ground. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 37/015: The Spinney, Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion	This is considered to be a good possibility as it is a Brownfield site.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.
Tim Waller, JB Planning Associates Ltd	Conclusion	I have noticed that the assessment of site 37/015 concludes that this site is not currently available for development, but it still concludes that 12 dwellings could be built on the site within the next 5 years. The NPPF is clear in its guidance on sites that can be included within a local authority's 5 year housing land supply, requiring sites to be deliverable. It notes that deliverable sites must be available now, which this site clearly is not. Given that the SLAA concludes that it would only be available towards the end of the 5 year period, I suggest it should be reclassified as falling within years 6-10.	Agreed.	Deliverability conclusion amended from 0-5 years to 6-10 years.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 37/016: Land north of Sanville Gardens, Stanstead Abbots & St Margarets

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Stanstead Abbots Parish Council	Conclusion	Cllrs understood that this site had previously been put aside for a Community building, play equipment, or a Drs surgery. Cllrs would only support this use of the site.	Partly agree. These proposed land uses were included within the July 2000 development brief for the wider site. The community building/GP service use is to be provided on another part of the site covered by the development brief, whilst development of this site would be expected to make provision for play equipment as part of an area of open space alongside any residential development.	No change.
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.
Duncan Murdoch, Moulton Walker	Availability – Ownership Intentions	We support the allocation of the land for residential development and the landowner's intention is to bring this site forward. As such the 'amber' score for availability should be 'green'.	Noted.	Update text in assessment comments and change assessment rating from AMBER to GREEN.
Duncan Murdoch, Moulton Walker	Major - Flood Risk Conclusion – Assessment of site suitability	Regarding the flooding issue, the previous flood risk assessment only identified part of this land as Flood Zone 3 and the balance is to be promoted for short term residential development.	Noted. However, current evidence shows that the site lies within Flood Zone 3 and fulfils the criteria for a RED rating. However, it is acknowledged that flood risk may not necessarily preclude development of a	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
			site since it is possible that mitigation measures could be implemented. Any further evidence will need to be submitted and considered by the Council and Environment Agency as part of any planning application for the site.	

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 15/017: Pentlows Farm, Braughing

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as agricultural. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 15/018: Land adjacent to & to the rear of 50 Green End, Braughing

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as residential. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 25/008: Land adjacent to 2 and rear of 2-10 The Roundings, Hertford Heath

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertford Heath Parish Council	Access – Buses All access criteria	The Parish Council was very concerned at the number of accessibility criteria by public transport that were marked GREEN. We have an hourly bus service (when it runs) which means that access by public transport to our primary school, secondary schools, employment facilities, hospitals and retail centres are only achievable if the bus runs on time and at a time suitable for people to access those facilities. One example is the afternoon bus from Hertford runs too early for children from Richard Hale and Simon Balle and they either walk home along a fairly dangerous road or wait nearly an hour for the next one. All of these should be AMBER as a minimum.	Disagree. Whilst it is acknowledged that access to services is constrained by the particular time that a bus service may run, the services assessed can be accessed by public transport within the threshold times agreed in the SLAA Site Assessment Criteria and therefore fulfil the criteria for a GREEN rating. It should also be noted that accessibility is a key consideration in the plan-making process and is being assessed at a number of different stages through work on the district-wide strategy selection.	No change.
Hertford Heath Parish Council	Access – Health GPs	You have also said that access by public transport to a GP is achievable within 15 mins. As the nearest GPs are in Hertford, it is doubtful that this can be achieved. Again this should be AMBER as a minimum.	Disagree. Based on data provided by Hertfordshire County Council Accession software, the site fulfils the criteria for a GREEN rating.	No change.
Hertford Heath Parish Council	Local - Biodiversity	I realise that the criteria are in alphabetical order but having Local - Biodiversity Wildlife so far up the table from Major - Biodiversity Wildlife means that the more important criteria can be overlooked. In our case, the site is adjacent to an SSSI and really should have an AMBER rating for the less important criteria too.	Agreed.	Update text in assessment comments and change assessment rating from GREEN to AMBER.
Hertford Heath	General	Having said all that, the site has planning consent for	Noted. The purpose of the	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
Parish Council	Comment	what you state as being deliverable so it seems to my members that whatever the ratings given, the site will be developed and they have difficulty in seeing the point of this exercise.	SLAA is to assess the likelihood of a site being developed for housing. It should not be assumed that all sites with planning permission will be developed.	
EHDC Environmental Health	Local - Contaminated Land	Currently developed as residential. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 33/002: Land at Walnut Close, Much Hadham

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 35/009: Land west of Buntingford Road & north of Mentley Lane East, Puckeridge

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 35/010: Former Kerry Foods Site, east of Station Road, Puckeridge

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. Record of previous industrial use including tanks. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.
Jane Orsborn	Availability – Ownership Availability	This site is now owned by Enfield Safety Supplies. It is my understanding that the new owners intend retaining it in employment use. I therefore consider the assessment of RED in terms of residential capacity is correct.	Noted.	Update text in assessment comments and change assessment rating from RED to GREEN.

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Site 35/020: Land adjacent to 14 Sadlier Road, Puckeridge

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 40/006: Land north of 16 Grass Warren, Tewin

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Tewin Parish Council	Site – Access Direct	Add: Access could be improved by extending the Grass Warren roadway into the central grass area. This would also improve access to adjacent existing properties. Consultation with local residents would be required.	Agreed.	Insert text in assessment comments. No change to RED assessment rating.
EHDC Environmental Health	Local - Contaminated Land	Currently open space. No record of previous industrial use. Amber rating	Disagree. Site is a greenfield site and there is no evidence of previous development. Therefore site is unlikely to be contaminated and should be given a GREEN assessment rating.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 40/018: 41 & 41a Upper Green Road, Tewin

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Tewin Parish Council	Site - Character – Existing	Add: Site is now derelict, and detrimental to existing character and a sustainable community. Development needs to be brought forward as quickly as possible. Existing plans for an office building on the site will potentially cause danger and nuisance to the three planned houses to the rear, especially from extra vehicle movements in an otherwise residential area, overspill parking, delivery vans etc.	Partly agree. An office use on the site is not considered to be incongruous to the surrounding residential area and would contribute to the formation of a sustainable community.	Insert text 'Site is now derelict and detrimental to existing character and a sustainable community' in assessment comments. No change to RED assessment rating.
Tewin Parish Council	Site – Access Standards	Add: Even though existing planning permission has aligned the exit to the northern part of the frontage, it will still be a very dangerous exit onto the main road. Tewin Parish Council would have preferred that this site was integrated with the existing Sevenacres development, and access achieved from the rear only.	Noted. However, the access arrangements agreed for the extant planning permission are not an issue for the SLAA, but it is noted that there was no objection to the scheme by the Local Highway Authority on highway safety grounds. Therefore site access onto the main road is considered to be acceptable.	No change.
Tewin Parish Council	Local – Employment	Add: When trading ceased, the site was basically employing a single motor mechanic, who is now operating from a different location in the village. The insistence on the provision of employment on this site appears to be having a major impact on the financial viability of development. Houses in Tewin are still selling quickly, but there is no sign of development starting on this site.	Disagree. The Council seeks to prevent the loss of sites in or previously in employment use in order to maintain a sufficient supply of employment land across the district. However, if it can be demonstrated that the site is no longer viable for non-residential uses, through adequate marketing over a	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
			reasonable period of time, the Council may consider relaxing the requirement for replacement employment provision on the site.	
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. Record of previous use as a petrol station. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 40/020: Land adjacent to 49 Upper Green, Tewin

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as residential. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 42/009: Land north of North Drive, High Cross

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 42/017: Land south of The Rectory, North Drive, High Cross

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 42/018: Land at 'The Bungalow', North Drive, High Cross

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Environmental Health	Local - Contaminated Land	Currently developed as residential. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.
Jane Orsborn	Availability – Ownership Intentions Conclusion	I act for the owners of this land, Mr and Mrs Murray Cooper. I have been asked to advise you that the site has recently been marketed, following which a preferred developer has been chosen and contracts are being drawn up. These two sites will be developed as part of a single comprehensive scheme. The development will also include additional land owned by Mr Brian Oakley. A single planning application will be submitted, hopefully later this year, for a total of about 62 units. Of these, about 47 units are likely to be provided on combined sites 42/018 and 42/019 which is broadly in line with your estimate of capacity.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 42/019: Land to the rear of 'The Bungalow', 35 North Drive, High Cross

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	Major - Flood Risk	Site has been identified on the Environment Agency surface water inundation mapping system as being at risk of surface water flooding from ground water or run off from hard surfaces and not necessarily flooding from rivers and watercourses.	Agreed.	Insert text in assessment comments and change assessment rating from GREEN to AMBER.
EHDC Environmental Health	Local - Contaminated Land	No record of previous development. Green rating.	Noted.	Insert text in assessment comments. Assessment rating given as GREEN.
Jane Orsborn	Availability – Ownership Intentions Conclusion	I act for the owners of this land, Mr and Mrs Murray Cooper. I have been asked to advise you that the site has recently been marketed, following which a preferred developer has been chosen and contracts are being drawn up. These two sites will be developed as part of a single comprehensive scheme. The development will also include additional land owned by Mr Brian Oakley. A single planning application will be submitted, hopefully later this year, for a total of about 62 units. Of these, about 47 units are likely to be provided on combined sites 42/018 and 42/019 which is broadly in line with your estimate of capacity.	Noted.	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 43/017: Land to rear of 82 High Street, Walkern

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Passenger Transport	Access - Buses	Stops are located on Stevenage Road/Cherry Tree Rise and not High Street.	Noted.	Update text in assessment comments. No change to AMBER assessment rating.
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 43/018: Land to rear of 65 High Street, Walkern

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Passenger Transport	Access - Buses	Stops are located on Stevenage Road/Cherry Tree Rise and not High Street.	Noted.	Update text in assessment comments. No change to AMBER assessment rating.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as residential. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 45/001: Watton-at-Stone Depot, Watton-at-Stone

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertfordshire County Council Property & Technology	Local Policy – Employment	The site has never been an employment site. It was used for storage of portacabins and has been vacant for approximately a year. The Inspector at the East Herts Local Plan Inquiry considered that since the site is located within the village boundary it did not need to be allocated for housing in order to be developed.	Disagree. The Council seeks to prevent the loss of sites in or previously in employment use in order to maintain a sufficient supply of employment land across the district and a storage use is considered to fall within a B8 use class.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently developed as commercial. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Site 45/003: Land at 22 Great Innings North, Watton-at-Stone

Respondent	Criteria	Summary Comment	Officer Response	Amendment
EHDC Engineering	General Comment	Site is likely to be able to be constructed (subject to conforming to sustainable drainage provision as identified in the SFRA) without further need to increase infrastructure, as it appears that the new development will not increase strains on existing infrastructure.	Noted.	No change.
EHDC Environmental Health	Local - Contaminated Land	Currently in use as a car park. No record of previous industrial use. Amber rating.	Noted.	Insert text in assessment comments. Assessment rating given as AMBER.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

General Comments

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Hertford Town Council	General Comment	As general comments concerning all of the proposed sites the question remained regarding infrastructure improvements, including additional schools, Doctors and road improvements.	Noted. Whilst infrastructure requirements have not been considered as part of the assessment of individual sites in the SLAA, they are a key consideration in the plan-making process and are being assessed at a number of different stages through work on the district-wide strategy selection. The District Plan will be supported by an Infrastructure Delivery Plan.	No change.
Hertford Town Council	General Comment	Concern was also expressed regarding the building of large amounts of flats which would change the character of the Town.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing. Whilst an assessment can be made on the type of housing that is likely to be deliverable on a site, it is not the role of the SLAA to prescribe a specific type of housing to a particular site.	No change.
Thorley Parish Council	Question	Will Thorley be considered at Round 3 of the SLAA?	Yes. Sites outside of the Main Settlements and Category 1 villages will be assessed as part of Round 3 of the SLAA, in line with the district-wide	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
			development strategy outlined in the District Plan.	
Thorley Parish Council	General Comment	Any planning proposals requiring substantial change to Bishop's Stortford's transportation infrastructure will have seriously adverse impacts on the parish.	Noted.	No change.
Thorley Parish Council	General Comment	Officers do not necessarily have accurate knowledge regarding the exact line of town/parish boundary to the north of the parish. In our view, this inextricable linking with the town will mean that the planning policy team's R2 assessment of town housing sites must, to be prudent, take into account comments from Thorley, and also that the parish must be kept informed so as to ensure, during the whole SLAA/District Plan process, that sites are not inadvertently being ascribed to a Main Settlement on the wrong side of the parish boundary.	Noted. Town/Parish boundaries and the settlement boundary of Bishop's Stortford are two separate entities. The settlement boundary of Bishop's Stortford is defined by the green belt boundary. Therefore sites within Thorley parish do fall within the main settlement of Bishop's Stortford.	No change.
Thorley Parish Council	General comments on Bishop's Stortford sites	Our concern with any of the sites listed would be with regard to adverse impact arising from a substantial increase in traffic. In particular we would not want to see housing on site 01/013 (reserve secondary school), especially if the awaited ministerial decision on schools' relocation were to find in favour of the developers' proposals for school building in Thorley.	Noted. Whilst infrastructure requirements have not been considered as part of the assessment of individual sites in the SLAA, they are a key consideration in the plan-making process and are being assessed at a number of different stages through work on the district-wide strategy selection. The District Plan will be supported by an Infrastructure Delivery Plan.	No change.
Thorley Parish	General	We also wish to state here our concern about the	Noted, but comment not	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Council	comment on ASR's	current development proposals for the ASRs, again with particular reference to the adverse impact for Thorley should the proposed new primary school locations [after the awaited ministerial decision] become part of the catchment area for the two secondary schools to be relocated in Thorley.	relevant to the SLAA. The SLAA is simply trying to ascertain the likelihood of sites coming forward for development. Wider implications of development will be considered if and when specific sites are allocated through the District Plan or at the planning application stage.	
Thorley Parish Council	Questions on ASR's	Are the ASR sites [to be] included in your R2 or R3 Site Assessment? Will we as a parish council have opportunity to give this more considered thought? How high exactly is the risk of these proposals being submitted as planning applications before publication after November 2012 of the final SLAA that your team is progressing to inform the preparation of the District Plan?	The ASR's will be assessed as part of Round 3 of the SLAA, in line with the district-wide development strategy outlined in the District Plan. Thorley Parish Council will be invited to comment on the SLAA site assessment as part of the stakeholder engagement process. Unable to comment on when a planning application may be submitted for the ASR's. The consortium in control of the ASRs is free to submit a planning application at any stage.	No change.
Thorley Parish Council	Question	Do you have included in SLAA R1 or elsewhere a list of sites identified in the parish of Thorley or neighbouring Spellbrook where housing could be built?	All sites submitted to the Council through the Call for Sites are publicly available to view on the Councils'	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
			website. Round 3 will consider those sites within the SLAA threshold in Thorley and Spellbrook. However, because the SLAA is an ongoing process, additional sites may be identified prior to the commencement of Round 3.	
Thorley Parish Council	Question	Will metropolitan green belt protection be relevant for R3 Site Assessment?	The SLAA includes a criterion on Green Belt. Sites in the Green Belt would be assessed as RED.	No change.
Thorley Parish Council	Question	Can Thorley effectively argue that no housing development sites exist in the parish because all undeveloped land is green belt?	Comment not relevant to SLAA.	No change.
Walkern Parish Council	General comment on Site 43/002	Site 43/002 - Land to the North/East of Stevenage Boxbury Farm, Walkern/Chells Farm, Stevenage; Call for Sites proposal for 5,000 dwellings to the east of Stevenage. Objection to the inclusion of Site 43/002 in the district-wide development strategy to be outlined in the District Plan.	Noted. However, this site has not been assessed as part of Round 2 of the SLAA. It will be assessed as part of Round 3 of the SLAA, in line with the district-wide development strategy outlined in the District Plan.	No change.
Cllr Diane Hollebon	General Comment	Currently the economic situation will no doubt delay any further development on the proposed sites. I am not personally in favour of more flats as indeed are so many residents of Bishop's Stortford who regularly talk with me. Smaller 2-3 bed homes are preferred in order to get families on the "starter" route.	Noted. The purpose of the SLAA is to assess the likelihood of a site being developed for housing. Whilst an assessment can be made on the type of	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
		Property prices are and will continue to ensure that young potential homebuyers have to leave Bishop's Stortford to move elsewhere. It is probably the same for the young people in East Herts villages too. There is only one site suitable to take some flat development, in my opinion, and that is the site close to the Railway Station, adjacent to Station Road in Bishop's Stortford.	housing that is likely to be deliverable on a site, it is not the role of the SLAA to prescribe a specific type of housing to a particular site.	
Cllr Gary Jones	General Comment on Conclusions	Generally the reference to the 'present economic climate' in the conclusions for several of the sites has resulted in the timescale for delivery being 6-10 years rather than 1-5 years. This may be valid but we should be wary about any conclusions drawn that there is not a sufficient five-year stock of housing sites. There appears to be sufficient housing numbers and it is only the economic climate that is holding back delivery.	Noted. The purpose of the SLAA is to assess the likelihood of sites coming forward for development. As such, it is very much affected by economic circumstances. Despite present economic circumstances, East Herts is required to maintain a 5 year supply of housing. Notwithstanding this, the number of dwellings anticipated to come forward on all SLAA sites would be insufficient to meet the housing requirement for the District to 2031.	No change
Hertfordshire County Council Highways	General Comment	The assessments accurately reflect the highway authority's position and no changes are necessary.	Noted.	No change.
Hertfordshire County Council Historic Environment	General Comment on Heritage assessments	No site specific comments. However, the assessment of 'Historic Environment' within the document is partial, since the constraint score assigned to each site is solely based upon the existence or otherwise of designated assets within a	Noted. It is acknowledged that the SLAA is a strategic assessment of the likelihood of a site coming forward for development	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
		<p>site, i.e., it is based on whether the site in question is included wholly or partly within an 'Area of Archaeological Significance', a Scheduled Monument, a Registered Park and Garden, or a locally listed historic park or garden - or is a Listed Building.</p> <p>The policies contained in the National Planning Policy Framework state that any detailed consideration of any proposal should take account of the presence and significance of any heritage asset present on a site, whether it be designated or undesignated. In the case of the latter, it should be noted that 'non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered to be subject to the policies for designated heritage assets' (NPPF Para 139).</p> <p>Although difficult to undertake at this stage of the process, it should be recognised that there may be constraints upon the development of certain sites that are as yet not fully identified or assessed by the LPA and these will need to be considered in more detail through any site allocation or planning application process</p>	and that further constraints may need to be assessed as part of consideration of a planning application.	
Hertfordshire County Council Passenger Transport	Access – Buses	<p>'Access Buses' - Normal assessment criteria is assumed to be within 400 meters which the majority of sites meet and not 800m as given. Where sites are over this criteria (400m) they have been detailed individually.</p> <p>In terms of chosen bus stops there are some errors in that stops have been identified which have marginal services and others are more appropriate, appropriate notes have been made correcting these issues as well.</p>	Noted.	SLAA Site Assessment Criteria amended from 800m to 400m distance from a bus stop. Amendments made to assessment comments and ratings as appropriate.
Hertfordshire	General	In recent years considerable work has been	Noted. However, it is not	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
County Council Landscape / Green Infrastructure	Comment	<p>undertaken within both East Herts and wider Hertfordshire to identify the potential for Green Infrastructure. It is noticed that Green Infrastructure has not been used as an assessment criteria within the SLAA process.</p> <p>Although not an absolute constraint, existing Green Infrastructure evidence should be used to assess the contribution / enhancements that future development sites can make; including the potential implications on the feasibility and deliverability of sites. This approach is supported by the NPPF and therefore should be considered through any site selection process.</p> <p>It is therefore suggested that Green Infrastructure should be considered through future iterations of the SLAA (particular in relation to those sites that are likely to have a greater impact on the contributions they can make to GI etc); and again through any future site selection process.</p> <p>The same also applies to the impact on / contribution to the landscape.</p>	<p>considered appropriate to introduce a new assessment criteria regarding Green Infrastructure to the SLAA exercise. It is acknowledged that larger sites will be expected to make a contribution to Green Infrastructure provision and this is being considered through the site selection work being carried out for the District Plan.</p> <p>Notwithstanding this, the purpose of the SLAA is to assess the likelihood of a site coming forward for development. Thus, if such opportunities affect the deliverability of a site then they will be considered in the conclusion.</p>	
EHDC Engineering	General Comment	<p>Many of the sites are brown field sites which are situated amongst existing development areas. We consider that it is unlikely that the drainage and transportation infrastructure at these sites are suitable to cope with the additional stresses of such increased development and should therefore not be considered for further development. If further development were considered it should be constructed in such a way that it did not place additional strains on this infrastructure either by reducing the volumes of traffic and sewer</p>	Noted.	No change.

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Respondent	Criteria	Summary Comment	Officer Response	Amendment
		discharges to levels below that which is currently generated by the site or by increasing the capacity of the road and sewer network coming from the proposed site. In any event it is essential that all new developments take account of the findings of the East Herts Strategic flood risk assessment document and provide adequate and suitable above ground sustainable drainage systems to ensure that the maximum amount of protection from flooding can be provided.		
EHDC Environmental Health	Local – Contaminated Land	The only way to be certain that a site is contaminated is by carrying out a site investigation report. These reports are carried out by consultants on behalf of developers and consequently subject to copyright. Also legislation and guidelines change so therefore the risk assessment carried out at the time could also change. Therefore none of the sites have been placed in the red category.	Noted.	No change.
Bishop's Stortford Civic Federation	General Comment	Our overall comment is that Bishop's Stortford continues to suffer from a piecemeal approach to development. We urge that a Master Plan process be started and that appropriate discussions be commenced with stakeholders regarding the form and shape of Bishop's Stortford. In this way, decisions regarding the sites within the SLAA would be easier as one would have an overall structure to guide individual decision making for each site. Until that time, we feel there is a risk of further deterioration of the town in terms of quality of life and related issues such as congestion, employment and health.	Noted. The SLAA is a technical study that will be used to inform ongoing work in developing the District Plan: Part- 1. The District Plan will outline the overall development strategy for Bishop's Stortford until 2031.	No change.
Bishop's Stortford Civic Federation	General Comment	The Civic Federation fully recognises that the SLAA does not consider whether a site "should" be developed, only if it "could" be developed.	Disagree. Consider that in most cases sites will come forward for development	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
		<p>We feel that the definition of "could" in the cases where we have expressed concern, is too wide and does not take into account, for example, the effect of any development itself being deleterious to the town. If one removes such sites from the process, the likelihood of development being forthcoming, is reduced.</p>	<p>irrespective of whether they have been identified in the SLAA. The SLAA helps the Council to be proactive both in terms of knowing in advance where development will happen and being able to inform the preparation of the District Plan in terms of taking into account the effect of piecemeal development on infrastructure.</p>	
<p>Mike Cook, MJ Cook Architect</p>	<p>Question</p>	<p>I am confused with your site references as these appear to have changed since the list that you produced for round 1. The list for round 1 finished at number 40/017 which was land at 8-9 Grass Warren, yet I note on a plan for site at 49 Upper Green referred to as 40/020, the site adjacent is referred to as 40/017, i.e. the same as Grass Warren. Do you therefore have an amended list of sites?</p>	<p>Following Round 1 of the SLAA it was noted that 'Land at 8-9 Grass Warren' had been included in the list twice (40/013 and 40/017). Therefore the site record for 40/017 was deleted. As further sites were identified for inclusion in Round 2 of the SLAA, these were added to the list starting from site reference 40/017. The full list of sites assessed as part of Round 2 of the SLAA are included in the SLAA Technical Study: Initial Report – Rounds 1 and 2 (November 2012).</p>	<p>No change.</p>
<p>Mike Cook, MJ</p>	<p>Question</p>	<p>I am unsure as to why you have only assessed three</p>	<p>These sites have received</p>	<p>No change.</p>

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
Cook Architect		<p>sites as there are other sites that are similar to sites 40/018 and 40/020, i.e approved but not under construction.</p> <p>These are: Land adjacent to 74 Upper Green Road - one dwelling approved ref. 3/10/1647/FP Land adjacent to 10 School Lane –one dwelling approved ref 3/11/2067/FP</p> <p>Also there is a further site for 10 houses that I believe is more than likely to get planning permission quite soon and that is: Seven Acres, 49 Upper Green Road –an additional 10 houses to the 18 approved and under construction ref 3/12/0597/FP.</p>	<p>planning permission following commencement of work on Round 2 of the SLAA. These sites will be assessed as part of an update of Round 2 of the SLAA, to be carried out alongside Round 3.</p>	
Mike Cook, MJ Cook Architect	Question	<p>I understand that you are considering a 10% increase in the number of dwellings in each village for the LDF; therefore will the 10% be based not only on the present number of dwellings in a village but also include all new dwellings that have or will be approved and built within the present Local Plan?</p>	<p>The 10% figure is for testing purposes only and is not a necessarily a policy position that will be carried forward into the District Plan.</p>	No change.
Richard Coutts, Baca Architects	General Comment	<p>We have now reviewed a sample of the sites, assessment criteria and weighting. In the round the assessment of the sample sites reviewed seem fair and reasonable.</p>	Noted.	No change.
Richard Coutts, Baca Architects	Major – Flood Risk	<p>We are glad that flood risk issues have been suitably weighted and note that several sites located within the floodplain, whilst located within built up areas and might seem natural brownfield infill had be identified as unsuitable for residential use.</p>	Noted.	No change.
Richard Coutts, Baca Architects	General Comment	<p>We have also identified that the assessment criteria currently only identifies constraints but not opportunities. Whilst this might take some informed judgement, some sites might have wider benefits due</p>	<p>Noted. This is considered more applicable to larger sites. Notwithstanding this, the purpose of the SLAA is</p>	No change.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
		to their strategic location, or could, as a mixed used development provide wider strategic goals say through section 106 contributions such as releasing part of the site for school playing fields. Thus we would suggest that an informed assessment of suitability might capture this in some way and be included within the 'availability conclusion'.	to assess the likelihood of a site coming forward for development. Thus, if such opportunities affect the deliverability of a site then they will be considered in the conclusion.	
Richard Coutts, Baca Architects	General Comment	We note that much of the consultation feedback to date has been regarding concern to preserve the openness of the countryside. We note that some of the sites may be suitable for residential development but not perhaps the entirety of the site. One solution might be to utilise the Green Infrastructure Plan to create protected buffer zones where development would not be permitted. Such an approach would allow controlled and responsible development to come forward, create green wildlife corridors and ensure clear boundaries are maintained between neighbouring towns.	Noted. The conclusion would take account of whether it was more appropriate to bring forward only part of the site. Green infrastructure is an important aspect of this, but not the only aspect of site suitability.	No change.
Tim Waller, JB Planning Associates Ltd	General Comment on Conclusions	There may be other sites which are not available now, but which have been included within the first 5 years in the SLAA. It is important that the SLAA is reviewed to ensure this is not the case, because any such sites could not be included in the Council's 5 year land supply. Similarly, all sites should be considered against the NPPF's other requirements for deliverable sites, namely that they should offer a sustainable location for development now, be achievable within a reasonable prospect that housing will be delivered on site within 5 years, and be viable. I accept that the SLAA and the 5 year land supply are separate things, but the SLAA will inevitably become part of the land supply calculation, and errors in the way it classifies sites could lead to a mistaken	Agreed.	Officers have reconsidered their initial conclusions on the deliverability of sites and have made amendments as considered appropriate.

SLAA Round 2 - Officer's Responses to Stakeholder Engagement (June 2012)

Respondent	Criteria	Summary Comment	Officer Response	Amendment
		impression of the Council's housing land supply, which would be entirely contrary to the guidance in the NPPF.		

ESSENTIAL REFERENCE PAPER 'C'

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
01/005	Bishop's Stortford	Works, Southmill Road	35	6 to 10	35	6 to 10	No material change.
01/009	Bishop's Stortford	Land to the rear of 37-57 Haymeads Lane	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	No material change.
01/012	Bishop's Stortford	Apton Road Car Park	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	No material change.
01/013	Bishop's Stortford	Reserve Secondary School Site	250	1 to 5	250	6 to 10	Following the recent dismissed appeal decision on the site and the need to resolve the issue of secondary school capacity through the plan-making process, it is considered that delivery of this site will be delayed and development will not now be achievable until years 6-10.
01/028	Bishop's Stortford	Council Offices & land at The Causeway	100	6 to 10	100	6 to 10	No material change.
01/031	Bishop's Stortford	Oxford House, London Road	6	11 to 15	6	6 to 10	As the site is being promoted for development, it is considered that delivery of this site will be achievable within 6-10 years.
01/032	Bishop's Stortford	Bishop's Stortford Delivery Office & Post Office	25	6 to 10	25	6 to 10	No material change.

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
01/037	Bishop's Stortford	9 Dolphin Way	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
01/065	Bishop's Stortford	Former Lancaster Garage Site, London Road	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	No material change.
01/119	Bishop's Stortford	The Mill Site, Dane Street	25	6 to 10	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	Due to the existing uses on the site, it is not currently considered that there is a reasonable prospect of development coming forward on the site within the plan period. This position will be reviewed as part of the annual update of the SLAA.
01/120	Bishop's Stortford	The Goods Yard, Station Road	60	6 to 10	200	6 to 10	Following comments received from the developer involved with the site, it is considered that 200 dwellings is a more realistic estimate of the quantum of residential development deliverable on the site, taking into account the need to balance viability issues and the current aspirations for the site as set out in the 2011 site development brief.
01/141	Bishop's Stortford	3a South Street & The Dells	18	6 to 10	18	1 to 5	Following comments received to the SLAA stakeholder engagement, it is considered that delivery of this site will be achievable within 5 years.
01/143	Bishop's Stortford	South Road Nurseries	6	1 to 5	6	1 to 5	No material change.

ESSENTIAL REFERENCE PAPER 'C'

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
01/144	Bishop's Stortford	Land at Jeans Lane	6	1 to 5	6	1 to 5	No material change.
01/146	Bishop's Stortford	71-77 South Street	40	6 to 10	40	1 to 5	Following pre-application discussions, it is anticipated that a planning application for development on the site will be submitted shortly. It is now considered that delivery of this site will be achievable within 5 years.
01/151	Bishop's Stortford	Former Fyfe Wilson Site, Station Road	42	6 to 10	42	6 to 10	No material change.
01/153	Bishop's Stortford	110-114 South Street	24	6 to 10	24	6 to 10	No material change.
01/155	Bishop's Stortford	Pearse House, Parsonage Lane	25	1 to 5	25	1 to 5	No material change.
01/156	Bishop's Stortford	Archers, 81 Havers Lane	6	6 to 10	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	As the site is now back in use as a Public House, it is not currently considered that there is a reasonable prospect of development coming forward on the site within the plan period. This position will be reviewed as part of the annual update of the SLAA.
01/157	Bishop's Stortford	Sports Field associated with Birchwood High School	40	6 to 10	40	6 to 10	No material change.

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
02/003	Buntingford	Land off Longmead	26	1 to 5	26	1 to 5	No material change.
02/010	Buntingford	Land to the south of Baldock Road	3	1 to 5	3	1 to 5	No material change.
02/037	Buntingford	Nevetts, Bowling Green Lane	15	11 to 15	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	Due to the existing use on the site, it is not currently considered that there is a reasonable prospect of development coming forward on the site within the plan period. This position will be reviewed as part of the annual update of the SLAA.
02/045	Buntingford	Buntingford Fire Station, Station Road	8	11 to 15	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	Due to the existing use on the site, it is not currently considered that there is a reasonable prospect of development coming forward on the site within the plan period. This position will be reviewed as part of the annual update of the SLAA.
02/046	Buntingford	The Railway PH, Station Road	8	1 to 5	8	1 to 5	No material change.
02/049	Buntingford	Watermill Industrial Estate	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
02/051	Buntingford	Park Farm Industrial Estate Extension	7	6 to 10	7	6 to 10	No material change.

ESSENTIAL REFERENCE PAPER 'C'

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
03/002	Hertford	National Grid Site/ Norbury Woodyard	300	6 to 10	200	6 to 10	The quantum of development on this site has been revised downwards as the initial capacity of 300 dwellings was considered deliverable across two sites in the wider Mead Lane area, whilst 200 dwellings is considered to be a more realistic capacity for this particular site.
03/007	Hertford	The Old Orchard	1	6 to 10	0 – Site considered unsuitable.	n/a	Following further consideration of a recently dismissed appeal decision for development on the site, it is considered that the site is unsuitable for development.
03/008	Hertford	Hertford Fire Station & Fire Service HQ	40	6 to 10	40	11 to 15	Due to the existing uses on the site and the need for these to be relocated, it is not currently considered that development could come forward on this site until the latter part of the plan period.
03/009	Hertford	West Street Allotments	10	11 to 15	10	11 to 15	No material change.
03/012	Hertford	13-19 Castle Mead Gardens	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
03/016	Hertford	1-14 Dicker Mill	50	11 to 15	50	6 to 10	Following comments received to the SLAA stakeholder engagement, it is now considered that delivery of this site will be achievable within 6-10 years.

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
03/017	Hertford	30-34 and 33-41 Chambers Street	18	6 to 10	18	6 to 10	No material change.
03/020	Hertford	Land at Braziers Field	18	1 to 5	18	1 to 5	No material change.
03/024	Hertford	Hertford Delivery Office	18	6 to 10	18	6 to 10	No material change.
03/100	Hertford	Land opposite 343-381 Ware Road	14 16	1 to 5 11 to 15	14	1 to 5	It is considered that delivery of the part of the site that has an extant planning permission will be achievable within 5 years. However, due to the existing uses on the remainder of the site, it is not currently considered that there is a reasonable prospect of development coming forward on this part of the site within the plan period. This position will be reviewed as part of the annual update of the SLAA.
03/101	Hertford	Land west of Marshgate Drive	182	6 to 10	182	6 to 10	No material change.
03/121	Hertford	Hertford Industrial Estate (Caxton Hill)	256	11 to 15	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	Due to the existing uses on the site and the Council's intention to retain the site as a designated Employment Area, with enhanced access to the A414 through the neighbouring industrial area, it is not currently considered there is a reasonable prospect of development coming

ESSENTIAL REFERENCE PAPER 'C'

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
							forward on this site within the plan period. This position will be reviewed as part of the annual update of the SLAA.
03/125	Hertford	Land to south of Mead Lane	100	6 to 10	100	6 to 10	No material change.
03/132	Hertford	Former Hertford and Ware Police Station	126	6 to 10	126	1 to 5	Demolition has commenced on this site so it is now considered that delivery of this site will be achievable within 5 years.
03/136	Hertford	Adams Yard, Bull Plain	8	1 to 5	8	1 to 5	No material change.
03/138	Hertford	15 Currie Street	5	1 to 5	5	1 to 5	No material change.
03/139	Hertford	7 & 8 Bluecoats Avenue	12	1 to 5	12	1 to 5	No material change.
03/140	Hertford	Former Dolphin PH Car Park	14	1 to 5	14	1 to 5	No material change.
03/141	Hertford	85 Railway Street	8	1 to 5	8	1 to 5	No material change.
03/142	Hertford	87-89 Railway Street	6	1 to 5	6	1 to 5	No material change.
03/143	Hertford	8, 10 & 12 Railway Street	7	1 to 5	7	1 to 5	No material change.
03/144	Hertford	10-12 The Wash	2	1 to 5	2	1 to 5	No material change.
03/145	Hertford	Former Waters Garage Site, North Road	14	1 to 5	14	1 to 5	No material change.

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
03/146	Hertford	Beesons Yard, 72 Railway Yard	8	1 to 5	8	1 to 5	No material change.
03/147	Hertford	Baker Street Car Park	14	1 to 5	14	1 to 5	No material change.
03/148	Hertford	Bentley House, Pegs Lane	24	1 to 5	24	1 to 5	No material change.
03/149	Hertford	Elbert Wurlings, Pegs Lane	10	1 to 5	10	1 to 5	No material change.
03/150	Hertford	Grehan House, 57 Molewood Road	0 – Site considered unsuitable.	n/a	5	1 to 5	Site has recently received planning permission for residential development so it is now considered that delivery of this site will be achievable within 5 years.
04/003	Sawbridgeworth	Land to the rear of 4 Newports	5	6 to 10	5	6 to 10	No material change.
04/049	Sawbridgeworth	Fire Station and Club, Station Road	12	11 to 15	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	Due to the existing uses on the site, it is not currently considered that there is a reasonable prospect of development coming forward on the site within the plan period. This position will be reviewed as part of the annual update of the SLAA.
04/051	Sawbridgeworth	Telephone Exchange, off London Road	8	11 to 15	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	Due to the current use on the site, it is not currently considered that there is a reasonable prospect of development coming forward on the site within the plan period. This position will be reviewed as part of the annual update of the SLAA.

ESSENTIAL REFERENCE PAPER 'C'

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
04/057	Sawbridgeworth	Sawbridgeworth Football Club, Crofters	80	6 to 10	80	6 to 10	No material change.
04/059	Sawbridgeworth	The Market House, Knight Street	6	1 to 5	6	1 to 5	No material change.
05/007	Ware	Baldock Street Car Park	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	No material change.
05/009	Ware	Land east of the Trinity Centre	40 41	1 to 5 6 to 10	81	1 to 5	Planning application to determine reserved matters has recently been submitted for the site. It is now considered that delivery of the whole site will be achievable within 5 years.
05/018	Ware	Cintel Site	13	1 to 5	13	1 to 5	No material change.
05/022	Ware	Swains Mill & land south of Crane Mead	80	11 to 15	80	6 to 10	As the site is being promoted for development, it is considered that delivery of this site will be achievable within 6-10 years.
05/036	Ware	16 New Road	12	1 to 5	24	1 to 5	The quantum of development on this site has been revised upwards as there are two extant planning permissions on different parts of the site, each for 12 dwellings. It is considered that delivery of 24 dwellings will be achievable within 5 years.

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
05/079	Ware	Star Street (Co-op Depot)	15	11 to 15	15	6 to 10	As the site is currently being marketed it is now considered that delivery of this site will be achievable within 6-10 years.
05/082	Ware	Mill Studios, North of Crane Mead	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
05/083	Ware	Rear of 39 High Street	6	6 to 10	6	6 to 10	No material change.
05/085	Ware	London Road, Ware (adjacent to New River Court)	7	6 to 10	7	1 to 5	Following comments received to the SLAA stakeholder engagement, it is anticipated that a planning application for development on the site will be submitted shortly. It is now considered that delivery of this site will be achievable within 5 years.
05/086	Ware	Former Musley Infants School	2	1 to 5	2	1 to 5	No material change.
05/087	Ware	49-51 Star Street	5	1 to 5	5	1 to 5	No material change.
05/089	Ware	The Sun & Harrow PH, 34 Fanhams Road	6	6 to 10	6	6 to 10	No material change.
15/017	Braughing	Pentlows Farm	28	1 to 5	28	1 to 5	No material change.
15/018	Braughing	Land adjacent to & to the rear of 50 Green End	2	1 to 5	2	1 to 5	No material change.

ESSENTIAL REFERENCE PAPER 'C'

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
23/003	Stanstead Abbots & St Margarets	Land north of Jansus, Amwell Lane	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
23/008	Stanstead Abbots & St Margarets	Land north of 19 Folly View	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
23/016	Stanstead Abbots & St Margarets	Land between Amwell Lane & the New River	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
25/008	Hertford Heath	Land adjacent to 2 and rear of 2-10 The Roundings	2	1 to 5	2	1 to 5	No material change.
33/002	Much Hadham	Land at Walnut Close	3	1 to 5	3	1 to 5	No material change.
35/009	Puckeridge	Land west of Buntingford Road & north of Mentley Lane East	58	1 to 5	58	1 to 5	No material change.
35/010	Standon	Kerry Foods, east of Station Road	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
35/020	Puckeridge	Land adjacent to 14 Sadlier Road	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	No material change.
35/035	Puckeridge	Tollsworth Way Caravan Site	12	1 to 5	12	1 to 5	No material change.

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
37/003	Stanstead Abbots & St Margarets	The Wilderness (land between Hoddesdon Road & the New River	5	1 to 5	5	6 to 10	As the site is not being marketed for development it is now considered that delivery of this site will be achievable within 6-10 years.
37/005	Stanstead Abbots & St Margarets	Land south of Sanville Gardens	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
37/011	Stanstead Abbots & St Margarets	Leeside Works, Lawrence Avenue	20	11 to 15	0 – Site considered suitable, but unachievable.	Beyond the Plan Period	Following comments received from the landowner of the site, due to the existing uses on the site and the landowners stated intention to retain the site in employment use, it is not currently considered that there is a reasonable prospect of development coming forward on the site within the plan period. This position will be reviewed as part of the annual update of the SLAA.
37/013	Stanstead Abbots & St Margarets	Land between Lawrence Avenue & the River Lea	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
37/015	Stanstead Abbots & St Margarets	The Spinney	12	1 to 5	12	6 to 10	Following comments received to the SLAA stakeholder engagement, it is now considered that delivery of this site will be achievable within 6-10 years.

ESSENTIAL REFERENCE PAPER 'C'

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
37/016	Stanstead Abbots & St Margarets	Land north of Sanville Gardens	0 – Site considered unsuitable.	n/a	0 – Site considered unsuitable.	n/a	No material change.
40/006	Tewin	Land north of 16 Grass Warren	3	1 to 5	3	1 to 5	No material change.
40/018	Tewin	41 & 41A Upper Green Road	3	1 to 5	3	1 to 5	No material change.
40/020	Tewin	Land adjacent to 49 Upper Green	1	1 to 5	1	1 to 5	No material change.
42/009	High Cross	Land north of North Drive	20	6 to 10	20	6 to 10	No material change.
42/017	High Cross	Land south of The Rectory, North Drive	25	6 to 10	25	6 to 10	No material change.
42/018	High Cross	Land at 'The Bungalow', North Drive	7	1 to 5	7	1 to 5	No material change.
42/019	High Cross	Land to the rear of 'The Bungalow' - 35 North Drive	38	1 to 5	38	1 to 5	No material change.
43/017	Walkern	Land to rear of 82 High Street	2	1 to 5	2	1 to 5	No material change.
43/018	Walkern	Land to rear of 65 High Street	1	1 to 5	1	1 to 5	No material change.
45/001	Watton-at-Stone	Watton-at-Stone Depot	20	1 to 5	20	1 to 5	No material change.

Site Ref	Settlement	Site Name	Interim Assessment – housing capacity	Interim Assessment – delivery time period	Final Assessment – housing capacity	Final Assessment – delivery time period	Reason for change
45/003	Watton-at-Stone	Land at 22 Great Innings North	3	1 to 5	4	1 to 5	Following comments received from a local Councillor, the quantum of development on this site has been revised upwards as 4 dwellings is considered to be a more realistic capacity for the site.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL - 28 NOVEMBER 2012 EXECUTIVE – 4 DECEMBER 2012

REPORT OF EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

EAST HERTS EMPLOYMENT FORECASTS AND STRATEGIC ECONOMIC DEVELOPMENT ADVICE (OCTOBER 2012)

WARDS AFFECTED: ALL

Purpose/Summary of Report

- This report presents technical advice prepared for the Council by DTZ containing employment forecasts and strategic advice on planning for economic development in the district. The report considers the future pattern of employment growth in East Herts and the surrounding area in order to inform the preparation of the East Herts District Plan: Part 1 – Strategy.

<u>RECOMMENDATION FOR DISTRICT PLANNING EXECUTIVE PANEL</u> <u>AND EXECUTIVE: That:</u>	
(A)	The Employment Forecasts and Strategic Economic Development Advice (October 2012) be supported and published as technical advice, forming part of the evidence base to inform and support the East Herts District Plan.
<u>RECOMMENDATION FOR COUNCIL: That:</u>	
(A)	The Employment Forecasts and Strategic Economic Development Advice (October 2012) be agreed and published as technical advice, forming part of the evidence base to inform and support the East Herts District Plan.

1.0 Background

1.1 The National Planning Policy Framework (NPPF) requires Local Planning Authorities to make rapid progress with plans to identify more land for future development. To achieve this goal, it includes important requirements including the Presumption in Favour of Sustainable Development (Paragraph 14), the Duty-to-Co-operate (Paragraphs 178), and the requirement for 'soundness' at

Examination including meeting 'objectively assessed needs' (Paragraph 182).

- 1.2 Part of assessing the objectively assessed needs of the District is the need to determine an appropriate approach to economic development as well as residential needs. As such, the Council commissioned DTZ to provide advice on economic development matters to inform the preparation of the District Plan. The result of this work is presented in this report.
- 1.3 East Herts is not a self contained economy. It is part of a sub-region with a number of urban centres, each important centres of employment in their own right. In economic terms East Herts plays a supporting role in relation to adjacent centres and Stansted Airport. Despite this however, East Herts has a relatively low level of unemployment and benefits from attractive centres and high levels of skilled employees.
- 1.4 The report takes commonly used employment forecast figures and appraises these in the context of East Herts' economic geography and role within the economic sub-region. It suggests a cautionary approach to these forecasts and provides a more realistic picture of East Herts' economic prospects and needs over the plan period. The report also provides advice regarding the pattern of employment growth across the District in terms of where employers are likely to want to locate and hence where jobs will need to be located. It highlights Bishop's Stortford as the best location for new employment land, benefiting from access to the M11 and Stansted Airport.
- 1.5 This report therefore seeks Council agreement to accept the findings of the strategic advice to inform and support the preparation of the East Herts District Plan.

2.0 Report

- 2.1 The Executive Summary of the East Herts Employment Forecasts and Strategic Economic Development Advice is provided at **Essential Reference Paper 'B'**. A copy of the full report can be found at www.eastherts.gov.uk/economic-advice
- 2.2 Prepared in seven sections, the report addresses a wide range of issues designed to inform decision making regarding the overall spatial strategy, with Section 1 setting the objectives and context of the report.

- 2.3 Section 2 describes the structure and character of the sub-region within which East Herts is located, and identifies the role that the towns and villages of the District play in this sub-regional economy.
- 2.4 Section 3 sets out the published forecasts of jobs growth in East Herts and the surrounding authorities to the year 2031. The East of England Forecasting Model (EEFM) is a commonly used model in the East of England region which suggests East Herts should plan for an additional 9,700 jobs forecast for the District to 2031. The report comments on these forecasts, paying particular attention to the limitations of employment forecasting at the individual district level.
- 2.5 Section 4 discusses a number of key trends that are shaping the patterns of job creation in terms of the type of jobs that are created and the spatial distribution of jobs. The report discusses changes in demand for different types of locations such as town centres or business parks for example. It looks at the effects of clusters in particular industries and discusses the potential impacts of changing work patterns and use of space. It also discusses the changing role of retail centres and the impact of Internet-based retail.
- 2.6 Section 5 examines the major employment sites in the local authority districts surrounding East Herts and the impact their proximity has, such as being well placed to capture a significant share of jobs growth interest.
- 2.7 Section 6 discusses the likely pattern of demand for employment land in the District and comments on issues that are specific to East Herts. It suggests a two-fold strategy for planning for future employment needs:
- Retention of existing major employers and supporting and enabling the growth of small and medium sized enterprises that have a particular local connection. Local connection may simply be associated with key decision makers and staff being local residents or because a firm has strong business linkages or historic associations with East Herts or within the sub-region.
 - Capitalising on the growth of specialist businesses in London and in the M25, A1(M) and M11 corridors, by catering for businesses that need to be in the sub-region, but do not need

or want to be in the major employment centres. The key attraction of East Herts to such businesses is likely to be the quality of environment and lifestyle associated with living and working in East Herts.

2.8 Section 7 presents the conclusions of the study and specifically comments on the options for the distribution of planned new homes from an economic development perspective.

3.0 Implications/Consultations

3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

East Herts Employment Forecasts and Strategic Economic Development Advice (DTZ Consultants, October 2012):

www.eastherts.gov.uk/economic-advice

Contact Member: Cllr Mike Carver - Executive Member for Strategic Planning and Transport
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Contact Officer: Kevin Steptoe - Head of Planning and Building Control
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Report Author: Jenny Pierce - Senior Planning Policy Officer
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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives <i>(delete as appropriate):</i>	<p>People This priority focuses on enhancing the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable.</p> <p>Place This priority focuses on the standard of the built environment and our neighbourhoods and ensuring our towns and villages are safe and clean.</p> <p>Prosperity This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic and social opportunities.</p>
Consultation:	N/A
Legal:	In accordance with the National Planning Policy Framework (NPPF), the District Plan needs to be based on objectively assessed evidence including meeting economic development needs (NPPF, paras. 18 to 28)
Financial:	N/A
Human Resource:	N/A
Risk Management:	Failure to base the District Plan on objectively assessed evidence could result in it being found unsound at examination.

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East Hertfordshire Employment Forecasts and Strategic Economic Development Advice – Executive Summary

Prepared on behalf of
East Hertfordshire Council
29th October 2012

Contact: Christopher Cobbold, Director: chris.cobbold@dtz.com
DTZ, a UGL company
125 Old Broad Street
London
EC2N 2BQ, UK

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Executive Summary 3

Executive Summary

1. This report considers the future pattern of employment growth in East Hertfordshire and the surrounding area in order to inform the development of the East Hertfordshire District Plan Part 1: Strategy. Specifically, the study sets out forecasts for employment in the District to 2031; discusses the socio-economic factors that will influence the pattern and location of job growth; and considers the implications for distribution of planned development within the District.
2. East Hertfordshire is a District of fairly small towns and an extensive rural area. It lies between the A1(M) and the M11. To the west there are a string of towns along the A1(M): Hatfield, Welwyn Garden City, Stevenage, Baldock and Letchworth. To the south and east there are the urban areas of Hoddesdon, Cheshunt and Harlow. Stansted Airport, a major centre of employment, lies just outside the District boundaries to the north east of the District.
3. This geography has a significant bearing on patterns of economic development. East Hertfordshire is not a self contained economy. Indeed it is part of a sub-region with a number of urban centres, each important centres of employment, linked on both the east and west by motorways that knit together the towns located close to those motorways. This area, which in this report, is referred to as the A1(M)-M11 Southern Sub-Region is an integrated labour and property market.
4. East Hertfordshire is an important part of this sub-region, but in economic terms it plays a supporting role in relation to the adjacent urban centres and Stansted Airport. It is home to many of the people who work in these adjacent towns (and the airport). The District's business base is made up predominantly of small and medium sized firms, many of which will have linkages to companies in the sub-region, to London or with Stansted airport.
5. Over the next 19 years (to 2031) forecasts indicate that employment in the sub-region will grow by some 60,000 jobs, of which 9,700 are expected to be created in East Hertfordshire. The forecasts suggest that of the 9,700 additional jobs forecast in East Hertfordshire, over 6,100 will be created in the financial and business services sector. All economic forecasts are subject to major uncertainties, and never more so than in the current economic environment, but are necessary for planning purposes.
6. However forecasts are less reliable for small areas, such as individual districts, than for sub-regions, and those are less reliable than for regions. This is because the way forecasts are prepared cannot readily take locally specific patterns of development into account. Great care also has to be taken in translating forecasts of jobs into estimates of requirement for business space (B1, B2 and B8 use classes) since large numbers of jobs (typically half of all forecast jobs) are not associated with occupation of such business space.
7. In view of these considerations this report has examined the key strategic sites within the sub-region that are, and will, cater for businesses by providing office, industrial and warehousing space (B1, B2 and B8 use classes). Each of the surrounding urban authorities has significant large scale sites or potential sites which they are promoting or likely to promote for employment purposes. These sites have good access to the motorway network and therefore are strategically well positioned to capture investment and jobs.
8. This study concludes that the major sites in the urban areas of the sub-region adjacent to East Hertfordshire are likely to capture the majority of demand from large scale business occupiers and from many medium and

small sized businesses. Even Bishop's Stortford, the one town in East Hertfordshire located on a motorway lacks the scale of Harlow, and is somewhat disadvantaged by being further than Harlow from the M25. Harlow itself is challenged by competition from some of the other sub-regional business parks.

9. In view of this, DTZ's judgement is that the forecasts from the East of England Forecasting Model may over estimate the scale of likely employment growth in East Hertfordshire to 2021 and under-estimate the potential for employment growth in some of the urban areas within the sub-region. DTZ's assessment is that East Hertfordshire will continue to achieve growth through the attraction and growth of small and medium sized employers, rather than attraction of new large employers.
10. The study makes a number of recommendations regarding the overall strategy for economic development in East Hertfordshire. However the main purpose of the study has been to inform the development and appraisal of different spatial options for the distribution of new homes and provision of land for business development (B1,B2 and B8) uses. The study concludes that a distributed pattern of sites suitable for business use is most appropriate to meet the diverse needs of businesses and would complement a strategy that distributed housing growth across the existing settlements in the District.
11. The study concludes that the location with the strongest prospects for employment growth in the District is **Bishop's Stortford**, because of its location on the M11; its proximity to Stansted Airport which is expected to generate additional jobs in future years; and the character of the town. To realise this potential for growth, DTZ anticipates the need for allocation of new employment land particularly for B1 uses, at a location on the A120 on the northern or western side of the town, ideally as close as practicable to Junction 8 on the M11. There is also scope for employment growth in the town centre. It would be consistent with planning policy to plan for significant residential growth to accompany employment growth.
12. In **Hertford and Ware** the opportunities for employment growth are deemed to be more restricted than at Bishops Stortford, but the towns have good road and rail links with London and adjacent towns. Thus there is scope to accommodate additional residential development in and around the two towns with little threat that new residents will be unable to access key centres of employment. Population growth would help reinforce the two town centres, which are likely to have to adapt to a tougher market environment. There is likely to be a need to rejuvenate and adapt existing industrial estates, and a potential requirement to identify new sites for B1 development.
13. **Sawbridgeworth** is not assessed to be a location where it will be possible to attract new business occupiers on any scale; it is probable that most residents of the town currently travel out of the town to work, be that to local centres of employment or into London. If there were large scale residential development in Sawbridgeworth, this pattern of most residents working elsewhere outside the town would be reinforced.
14. **Buntingford** is not a strategic employment location and will not attract large scale employers, since such employers would not be able to recruit locally. But the town could attract smaller, essentially local, employers. Were additional housing to be developed in Buntingford, the current patterns of employment would probably prevail, with a relatively high proportion of new residents being either retired or at a stage in their career where they can work part time, or work from home; or others who are mobile workers who are not attached to one place of work; and still others who accept commuting by car as the consequence in living in a market town in a rural setting.
15. A number of options are being considered for development of new homes to the **north of Harlow**, and there have been suggestions in the past of the development of a significant new business park in connection with such a residential development. DTZ do not regard the proposal for a business park as a realistic and deliverable option within the current plan period to 2031.

16. However the north of Harlow is located close to Harlow Town railway station and close to significant areas of employment in Harlow itself, so the absence of a business park as part of the development proposals would not mean that residents would find it difficult to access jobs. The residential development might over the longer run contribute to the economic development aspirations for Harlow.
17. A site on the eastern edge of **Welwyn Garden City** is one of the options under consideration for new housing. Given the wide range of employment opportunities in Welwyn Hatfield, and more generally in the A1(M) corridor, new residents would have access to jobs, but would probably be very reliant on car transport to access jobs other than in town centre locations. Consideration might be given to a modest employment land allocation as part of the scheme, which would in some way compensate for difficulties in identifying a site for modern B1 development in a high visibility, high accessibility location in Hertford and Ware.
18. The option of encouraging modest housing growth in the **villages across East Hertfordshire** is not likely to change current patterns of employment, whereby those residents who work either travel by car to work in the surrounding towns or further afield including central London; with probably an increasing number working at or from home. The most obvious policy for the local authorities (District and County) to pursue to limit the impact of village growth on car based journeys is to ensure all villages are able to access high quality broadband internet services.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 28 NOVEMBER 2012 EXECUTIVE – 4 DECEMBER 2012

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

DISTRICT PLAN: EVIDENCE BASE – TECHNICAL STUDIES 2011/12, 2012/13 AND 2013/14

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- To update the Panel on progress in respect of completed and ongoing District Plan evidence base related technical studies from 2011/12 and note or seek agreement to those underway or proposed to be undertaken during 2012/13 and 2013/14.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: that</u>	
(A)	it be noted, or as appropriate supported, that the technical studies listed in Essential Reference Paper ‘B’ to this report, which are due for completion, already underway or proposed to be undertaken during 2012/13, contribute to the District Plan Evidence Base; and
(B)	the technical studies referred in (A) above be completed or undertaken by means of: (i) seeking competitive quotes or tenders, as appropriate, to engage consultants, with the costs being met from the 2012/13 or 2013/14 Planning Policy related budgets for such purposes; and/or (ii) partnership working where appropriate, with neighbouring authorities and other relevant partners.

(C)	the Head of Planning and Building Control, in consultation with the Executive Member for Planning Policy and Transport, be given authority to approve funding, within the limits of the 2012/13 and 2013/14 Planning Policy budgets, for such other relevant planning policy studies, as may be deemed appropriate.
RECOMMENDATIONS FOR COUNCIL: that	
(A)	it be noted, or as appropriate agreed, that the technical studies listed in Essential Reference Paper ‘B’ to this report, which are due for completion, already underway or proposed to be undertaken during 2012/13, contribute to the District Plan Evidence Base; and
(B)	<p>the technical studies referred in (A) above be completed or undertaken by means of:</p> <p>(i) seeking competitive quotes or tenders, as appropriate, to engage consultants, with the costs being met from the 2012/13 or 2013/14 Planning Policy related budgets for such purposes; and/or</p> <p>(ii) partnership working where appropriate, with neighbouring authorities and other relevant partners.</p>
(C)	the Head of Planning and Building Control, in consultation with the Executive Member for Planning Policy and Transport, be given authority to approve funding, within the limits of the 2012/13 and 2013/14 Planning Policy budgets, for such other relevant planning policy studies, as may be deemed appropriate.

1.0 Background

- 1.1 One of the keys aims of the planning system is that Local Plans and Supplementary Planning Documents (SPD’s), should be founded on a robust and credible evidence base.
- 1.2 The evidence base should consist of a number of background or technical studies/assessments that can then be used to both inform and justify plan policies. The studies should aim to run for the life of the plan and be subject to review where they fall short of the time period.

2.0 Report

2.1 **Essential Reference Paper 'B'** to this report sets out:

- Studies Completed 2011/12
- Studies Completed so far 2012/13
- Studies On-going/Started 2011/12 and 2012/13
- Studies Proposed for 2013/14
- Summary Financial Table 2011/12 and 2012/13

2.2 As the year progresses there may be other relevant planning policy studies which may be deemed appropriate to undertake. It is considered that within the limits of the 2012/13 and 2013/14 Planning Policy budgets, the Head of Planning and Building Control, in consultation with the Executive Member for Strategic Planning and Transport, be given authority to approve the funding for such studies.

3.0 Implications/Consultation

3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

None.

Contact Member: Councillor M G Carver
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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

<p>Contribution to the Council's Corporate Priorities/ Objectives <i>(delete as appropriate):</i></p>	<p>People This priority focuses on enhancing the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable.</p> <p>Place This priority focuses on the standard of the built environment and our neighbourhoods and ensuring our towns and villages are safe and clean.</p> <p>Prosperity This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic and social opportunities.</p>
<p>Consultation:</p>	<p>Consultation on the preparation of this report has taken place with the Executive Member and other relevant East Herts Council Officers.</p>
<p>Legal:</p>	<p>Not having appropriate technical studies, as part of the District Plan evidence base, may mean that the District Plan will be found to be unsound and the Council will have failed in its statutory requirement to produce and deliver a Development Plan for East Herts District, that has a sound evidence base.</p>
<p>Financial:</p>	<p>It is currently anticipated that those technical studies proposed to be externally prepared by consultants during 2012/13 and 2013/14, where an East Herts Council financial contribution is anticipated, will be funded from agreed Planning Policy budgets for such purposes. Should there be funding issues, a further report will be prepared to consider ways of addressing this.</p>
<p>Human Resource:</p>	<p>Existing Planning Policy staff resources will be required to commission and project manage the various technical studies.</p>
<p>Risk Management:</p>	<p>Not having appropriate technical studies as part of the District Plan evidence base, may mean that the District Plan will be found to be unsound and the Council will</p>

	have failed in its statutory requirement to produce and deliver a Development Plan for East Herts District, that has a sound evidence base.
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**EAST HERTS COUNCIL
LOCAL DEVELOPMENT FRAMEWORK
EVIDENCE BASE – TECHNICAL STUDIES
2010/11 AND 2011/12**

APPENDIX

Acronyms

CIL	–	Community Infrastructure Levy
DfT	–	Department for Transport
EEDA	–	East of England Development Agency
ECC	–	Essex County Council
GAF3	–	Growth Area Funding (Government) Round 3 2008-2011
HBRC	–	Hertfordshire Biological Records Centre
HCC	–	Hertfordshire County Council
HIIS	–	Herts Infrastructure and Investment Study
HIPP	–	Herts Infrastructure and Planning Partnership
HRA/AA		Habitat Regulations Assessment/Appropriate Assessment
LCB	–	London Commuter Belt (East)/M11 Sub-Region
LEP (Herts)	–	Local Enterprise Partnership (Hertfordshire)
LGA	–	Local Government Association
LPA	–	Local Planning Authority
PAS	–	Planning Advisory Service – Part of LGA
PCT	–	Primary Care Trust
POD	–	Programme of Development (Government)
PPS	–	Planning Policy Statement (Government)
SA/SEA	–	Sustainability Appraisal/Strategic Environmental Assessment
and		and
SHLAA	–	Strategic Housing Land Availability Assessment
tbc	–	to be confirmed

Studies Completed 2011/12				
Study Title	Study Purpose	Completion Date	Cost/Funding Source	Consultant
Hertfordshire Strategic Employment Site Study	<p>This study focuses on identifying appropriate strategic sites for potential future employment land.</p> <p>The study includes useful economic information and assessment, together with potential economic growth scenarios for the future.</p> <p>See separate report 6 to the LDF Executive Panel meeting, 24 November 2011.</p>	April 2011	<p>Total cost: £67,110 paid 2010/11.</p> <p>East Herts Council contribution: £2,000 paid 2010/11.</p> <p>Joint partnership of HCC, EEDA and 10 Herts Districts.</p>	Regeneris Consulting

Studies Completed so far 2012				
Study Title	Study Purpose	Completion Date	Cost/Funding Source	Consultant
Hertfordshire Infrastructure and Investment Strategy Refresh 2012	Partial review of the 2009 HHS Report to take account of: <ul style="list-style-type: none"> • Recent planning, funding and infrastructure need; • Management of infrastructure planning and delivery; • Relationship between strategic and local infrastructure need. 	Live document – latest dated version August 2012.	Jointly commissioned by Herts LEP and HIPP. Total cost: £20,000 funded by HCC. No East Herts Council funding.	HCC In-house and RS Regeneration
Employment Forecasts and Strategic Economic Development Advice	Technical advice containing employment forecasts and strategic advice on planning for economic development in the District. See separate report to this Panel meeting.	October 2012	Total cost: £11,800 East Herts Council contribution: £11,800:2012/13	DTZ Consultants
Sub-District Population and Household Forecasts	Provision of population and household technical work at a sub-district level, undertaken in two phases: Phase 1 provides 'trend-led' demographic information; Phase 2 tests a range of alternative dwelling-based scenarios at sub-district level. See separate report to this Panel meeting.	October 2012	Total cost: £16,000 East Herts Council contribution: £6,400:2011/12 £9,600:2012/13 £16,000:Total	Edge Analytics Ltd of Leeds, using 'POPGROUP' suite of population forecasting models, which it manages on behalf of the owners, the LGA.
Strategic Land Availability Assessment Round 2 Final Report	Identify potential sites for development within the development boundaries of the 2007 Local Plan Six Main Settlements and Category 1 Villages and give a technical assessment as to whether they are developable and when they could be developed. Such an assessment is a requirement of the NPPF March 2012.	October 2012	In-house Officer time	In-house

Studies On-going/Started 2011/12 and 2012/13				
Study Title	Study Purpose	Completion Date	Cost/Funding Source	Consultant
Herts Community Infrastructure Levy (CIL) Viability Assessment	This study will provide a CIL Viability Assessment to support emerging infrastructure planning work being undertaken in Hertfordshire. This will underpin individual District Local Plan Strategies, as well as draft CIL Charging Schedules, that are expected to emerge over the course of the next 12 months as a precursor to the introduction of CIL.	November 2012	Total Cost: £34,680 for study, plus £3,800 for Joint Project Manager. East Herts Council contribution: £3,873 for study, plus £650 for Project Manager. £4,523:Total £975:2011/12 £3,548:2012/13 Joint Herts Local Authority Partnership of 9 Herts Districts (excluding North Herts).	Lambert Smith Hampton and Project Manager: RS Regeneration
Population Forecasts for Greater Essex, East Herts and Welwyn Hatfield	Provision of population forecasts to support preparation of Local Plans and contribute to other spatial planning activities, i.e. total population, economically active population, households and dwellings, together with demographic interpretation of forecast outcomes and advice on other related demographic matters. Preliminary Study – December 2011 – for use in developing the East Herts District Plan Part 1-Strategy. Final Study – January 2013 – for use in finalising the East Herts District Plan Part 1-Strategy.	Preliminary Study December 2011 Final Study: January 2013	Total cost: £65,053 East Herts Council contribution: £2,870:2011/12 £957:2012/13 £3,824:Total Joint funding partnership comprising all 12 Essex Districts, 2 Essex Unitaries and 2 Herts District of East Herts and Welwyn Hatfield.	Edge Analytics Ltd of Leeds, using 'POP GROUP' suite of population forecasting models, which it manages on behalf of the owners, the LGA.

Studies On-going/Started 2011/12 and 2012/13				
Study Title	Study Purpose	Completion Date	Cost/Funding Source	Consultant
Strategic Development Viability Advice	Technical work to assess the likely cumulative impacts of a range of planning policy requirements, (i.e. affordable housing, CIL, green policies, parking and design requirements) on development viability and assist the Council in demonstrating that it's District Plan is deliverable.	November 2012	Total Cost: £22,950 East Herts Council contribution: £22,950:2012/13	Level
London Commuter Belt East Sub Region Strategic Housing Market Assessment Update 2012 Plus Older Persons Housing Requirements Study	Technical work to update the original 2008 study. Issues covered: Existing housing stock of the area Property prices and affordability Role of private rented sector in meeting housing need Impact of Government policy changes since 2010 Current housing need Future housing requirements from 2011-2013 including scenario testing. The Older Persons Housing Requirements study provides information as to the scale and type of housing that older people are likely to require in the future. Taking into account issues of health and work, the study considers the supply of retirement housing as well as the ability of older people to buy and rent, and the propensity for older people who may be under occupying family housing to seek alternative housing options.	December 2012	Total cost: £20,000 East Herts Council Contribution: SHMA:£5,000: 2012/13 Joint partnership comprising four District Councils: East Herts, Epping Forest, Harlow, Uttlesford	Opinion Research Services

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Studies On-going/Started 2011/12 and 2012/13				
Study Title	Study Purpose	Completion Date	Cost/Funding Source	Consultant
District Plan Part 1: Strategy Transport Modelling	Technical work to inform the emerging options/scenarios for the District Plan Part 1:Strategy, undertaken by: 1) HCC/Aecom using Diamond Model 2) ECC using Harlow/Stansted Gateway Transport Model (HSGTM)	January 2013	Total cost: 1) Diamond: £21,681 2) HSGTM: tbc East Herts Council contribution: 1) £21,681:2012/13 2)tbc :2012/13	HCC/ECC
Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) 'Critical Friend' Support	SA/SEA of emerging District Plan Part 1-Strategy Consultation Document.	January/February 2013	Total cost: In-house Officer time In-house and Planning Advisory Service (PAS) advisory consultants, 5 days of free consultancy advice.	In-house and PAS advisory consultants: Amec
Habitats Regulation Assessment (HRA) 'Critical Friend' Support	HRA of emerging District Plan Part 1-Strategy Consultation Document, in relation to European designated nature conservation areas.	January/February 2013	Total cost: £3,700 East Herts Council contribution: £3,700: 2012/13	URS

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Studies Proposed for 2013/14				
Study Title	Study Purpose	Completion Date	Cost/Funding Source	Consultant
Bishop's Stortford and Sawbridgeworth Urban Transport Plan	<p>This study will be a daughter document to the Herts LTP, and will provide a list of transport issues for Bishop's Stortford and Sawbridgeworth, and where possible the potential solutions and improvements proposed to address them, allowing prioritisation and delivery through the Herts LTP, and other funding mechanisms. This study is to be informed by the emerging East Herts District Plan Part 1-Strategy, prior to completion of UDP.</p> <p>The UTP will cover the next 20 years to 2031 (with review after first five years).</p>	2013	<p>Total cost: tbc Funded by HCC.</p> <p>No East Herts Council funding.</p>	Aecom
Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) 'Critical Friend' support	SA/SEA of Submission Version of District Plan Part 1-Strategy.	2013	Total cost: tbc	In-house and PAS advisory consultants: Amec
Habitats Regulation Assessment (HRA)	HRA of Submission Version of District Plan Part 1-Strategy, in relation to European designated nature conservation areas.	2013	Total cost: tbc	URS

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Studies Proposed for 2013/14				
Study Title	Study Purpose	Completion Date	Cost/Funding Source	Consultant
Gypsy and Traveller and Travelling Showpeople Accommodation Assessment and Site Scoping Study	<p>To update previous Gypsy and Traveller Accommodation Needs Survey (published in 2006) in light of the 'Planning policy for traveller sites' national guidance issued in conjunction with the NPPF, March 2012, to provide the most recent evidence base for demonstrating locally arising need for the plan period and to be expanded to include the needs of Travelling Showpeople.</p> <p>To revise the Gypsy and Traveller Site Scoping report (completed in 2007). The basis of the report to be expanded to take into account the site accommodation needs of Travelling Showpeople, and also to assess the potential of growth locations identified in the Preferred Strategy to provide accommodation for travellers, where a local need has been identified (see above), as an integral part of future planned development.</p>	<p>Gypsy and Traveller and Travelling Showpeople Accommodation Assessment: Spring 2013</p> <p>Gypsy and Traveller and Travelling Showpeople Site Scoping Study: Spring/Summer 2013</p>	tbc	tbc
Strategic Land Availability Assessment Round 3	Round 3 considers sites outside the current settlement boundaries of the Six Main Settlements and Category 1 Villages, and will be informed by the broad locations identified for development in the District Plan Part 1: Emerging Preferred Strategy.	Summer 2013	In-house Officer time	In-house

**EAST HERTS COUNCIL
LOCAL DEVELOPMENT FRAMEWORK
EVIDENCE BASE – TECHNICAL STUDIES
2010/11 AND 2011/12**

SUMMARY FINANCIAL TABLE

Funding Source	2011/12 Spend	2012/13 Anticipated /proposed spend (as at November 2012)
East Herts Council	£10,245	£79,236
External Funding, contributing to East Herts District Plan Evidence Base, excluding any East Herts Council contribution. (N.B: Not readily able to identify spending split for external funding between the two financial years).	£130,186	

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL - 28 NOVEMBER 2012 EXECUTIVE – 4 DECEMBER 2012

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

THE 'DUTY TO CO-OPERATE' AND EAST HERTS DISTRICT PLAN

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report explains that the Duty to Co-Operate is a requirement contained within the Localism Act 2011;
- It explains the significance of this in terms of cross-boundary strategic priorities, particularly in relation to housing;
- The report advises that it is considered crucial for East Herts Council Members to adhere to the agreed strategy selection process in order to seek to avoid a situation where the Planning Inspectorate intervenes on the basis of failure to comply with the Duty to Co-Operate;
- Finally, it proposes that the Executive Member for Strategic Planning and Transport be authorised to represent East Herts Council in meetings with the relevant Member(s) from neighbouring local planning authorities, Hertfordshire and Essex County Councils, and other relevant bodies.

RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:

(A)	an approach to the Duty to Co-Operate based on a clearly defined plan-making process, objective assessment, positive preparation, and serious consideration of cross-boundary strategic matters, be supported as the basis for continued work on the District Plan;
(B)	the Executive Member for Strategic Planning and Transport be authorised to attend meetings with Members from local planning authorities, Hertfordshire and Essex County Councils, and other relevant bodies as necessary, to

	demonstrate compliance with the Duty and further progress the District Plan;
<u>RECOMMENDATIONS FOR COUNCIL:</u> That:	
(A)	an approach to the Duty to Co-Operate based on a clearly defined plan-making process, objective assessment, positive preparation, and serious consideration of cross-boundary strategic matters, be agreed as the basis for continued work on the District Plan;
(B)	the Executive Member for Strategic Planning and Transport be authorised to attend meetings with Members from local planning authorities, Hertfordshire and Essex County Councils and other relevant bodies as necessary, to demonstrate compliance with the Duty and further progress the District Plan.

1.0 Background

1.1 Section 110 of the Localism Act includes a new 'Duty to Co-Operate'. This requirement is reflected throughout the National Planning Policy Framework (NPPF). In effect, the Duty is a requirement for Local Planning Authorities to engage in effective strategic planning, and is therefore a replacement for the previous system of regional planning.

1.2 **Essential Reference Paper 'B': Guidance on the Duty to Co-Operate** sets out the relevant paragraphs from the NPPF and explains the background, rationale and main requirements of the Duty. Failure to demonstrate compliance with the Duty can lead to plans being found unsound at examination in public.

1.3 The North London Waste Plan provides a recent example of failure to comply with the Duty:

"A 15-year waste strategy drawn up by seven London councils has become the first English plan to fall foul of the Localism Act's duty to co-operate. Inspector Andrew Mead has ruled that the North London Waste Plan (NLWP) does not comply with the duty and is therefore not sound because 'there has not been constructive, active and ongoing engagement during the NLWP's preparation between the north London councils and the planning authorities to which significant quantities of waste are exported'. Earlier this year, regional waste planning bodies the South Waste

Planning Advisory Group (SEWPAG) and the East of England Waste Technical Advisory Body, which receives waste from north London, objected to the plan. Mead said that contact between the north London councils and these authorities had been 'scant'."
Waste strategy fails on duty to co-operate test: Planning Magazine, 7th September 2012, page 5.

1. 4 As this case demonstrates, it is important that plan-makers should consider the requirements of the duty throughout the plan-making process. For this reason, the nature and extent of co-operation required can only be understood in relation to specific plans, taking account of their scope, likely impact, and key stakeholders.

2.0 Report

- 2.1 The Planning Advisory Service (PAS) guidance states that the Duty to Co-Operate "is the first thing that the Planning Inspectorate (PINS) will look at...A 'tick-box' approach or a collection of correspondence will not be sufficient. Councils will also need to show how they have considered joint plan-making arrangements, what decisions were reached and why...The policy outcomes of co-operation will need to be tested against the evidence at examination in the normal way."
- 2.2 East Herts Council's stepped approach to strategy selection, including the gradual testing and refinement of initial assumptions, means that East Herts Council is considered to be in a much stronger position than those local planning authorities which do not have such a transparent and rigorous approach to testing of evidence. The Council has a very clear and comprehensive audit trail to justify the decisions which lie behind the choice of strategy which will be presented at the end of the process.
- 2.3 Added to this, a process of continuous engagement with key stakeholders has been central to the strategy selection process, not as a 'tick-box' exercise, but in a genuine attempt to understand the wider issues behind the difficult policy choices which East Herts Council and others will have to make.
- 2.4 The final strategy will rest on a basis set out in a clear narrative within the Supporting Document. This document draws heavily on a further quantity of evidence, including meetings and exchanges with all the key stakeholders as defined by the NPPF. It also demonstrates how the process has responded to public consultation and addressed risk and uncertainty.

Cross-Boundary Strategic Priorities

- 2.5 One of the thorniest issues facing East Herts Council is the issue of cross-boundary strategic priorities. A particularly complex matter in this regard is that of **unmet housing need** from neighbouring authorities (NPPF paragraphs 179 and 182).
- 2.6 The ‘objectively assessed needs’ (Paragraph 182) of each local authority area must be established through population projections, which East Herts Council and several of the neighbouring authorities have done, or by relying on the projections of the East of England Forecasting Model (EEFM) which was run for all Districts in the East of England region in spring 2012.
- 2.7 NPPF Paragraph 179 states that *“Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework”*
- 2.8 Harlow, Stevenage, and Broxbourne, all have relatively tightly drawn administrative boundaries. Although Welwyn Hatfield Borough’s boundaries are not drawn as tightly, it has recently suggested that due to constraints within its district it is unable to meet all of its needs within the District, and will therefore seek to accommodate some of its housing needs within the adjoining districts of St Albans and East Herts.
- 2.9 Cross-boundary priorities can only emerge through the plan-making processes of the various local planning authorities, to show how they have taken the needs of adjoining authorities into consideration, and to objectively assess the strategic role and function of their neighbouring areas as well as their own needs. This is likely to include consideration of the whole range of social, economic, and environmental issues in the NPPF, within the context of the presumption in favour of sustainable development.
- 2.10 At the ‘formative stage’ of plan-making, each authority must be sufficiently confident that it is able to demonstrate that it has taken account of all the relevant cross-boundary matters in reaching its preferred strategy and in drawing up the policies which follow on from the strategy.

- 2.11 It is possible that, following due planning processes, there will still be disagreement between Local Planning Authorities at Examination in Public. This is acknowledged by the PAS guidance: *“Co-operation works two ways. Situations may arise where an invitation to co-operate is not accepted, or agreement on shared policy outcomes cannot be reached.”*
- 2.12 If agreement cannot be reached prior to examination, the only way to reach a conclusion is for the evidence presented by both authorities to be tested at examination in public. The Planning Inspector will then decide whether the request to co-operate is based on ‘reasonable’ evidence. If such a situation were to arise, the rigorous process and extensive evidence assembled by East Herts Council should enable it to successfully defend the proposed plan.
- 2.13 However, there remains a risk that, if the Council does not adhere to the agreed strategy selection process, but proceeds on grounds other than the planning requirements set out in the NPPF, that the evidence for the proposed strategy will be found to be insufficient at Examination, and the plan may be found unsound. This could result in proposals from adjoining districts in effect being forced onto East Herts Council by the Planning Inspectorate. The risk of this happening can be reduced if the Council continues to engage positively in the plan-making process.

Statutory Consultees and Other Stakeholders

- 2.14 National planning regulations specify a number of important stakeholders in the formative stages of plan-making. These include ‘statutory consultees’ such as Natural England, the Environment Agency, English Heritage, and the Highways Agency. They also include key public and private sector providers of infrastructure and services. East Herts Council has taken particular care to ensure that these bodies have been engaged in the formative stages of plan-making, and this is clearly evident through the Supporting Document to Part 1 of the District Plan.
- 2.15 In this regard, Hertfordshire and Essex County Councils are important stakeholders in East Herts Council’s plan-making process, as they are significant providers of key services likely to be impacted by the plan, particularly in relation in education and highways, but also other services. Whilst there has already been

considerable engagement, there remain a number of areas where further engagement with both County Councils is necessary before East Herts Council can be in a position to demonstrate that it has a sound plan. These issues are addressed in more detail in Agenda Item 11: District Plan Part 1 – Strategy Supporting Document: Update Report.

Member Engagement with the Duty to Co-Operate

- 2.16 As explained above, it is important that the Council as a whole adheres to the agreed strategy selection process, in order to demonstrate at Examination that the strategy is based on planning considerations set out in the NPPF, and that co-operation is forthcoming where it is required by such considerations.
- 2.17 However, it is also important that the Council has direct Member engagement with neighbouring authorities and also with Hertfordshire and Essex County Councils, where there is likely to be an expectation that co-operation will go beyond the officer level, in order to demonstrate a proper level of commitment to strategic planning.
- 2.18 It is important that Member-level contact projects consistent and co-ordinated messages with a clear strategic focus in representing the Council as a whole, and demonstrates a good understanding of both NPPF requirements and the strategy selection process for the District Plan.
- 2.19 Therefore it is proposed that the Executive Member for Strategic Planning and Transport be authorised to represent East Herts Council in meetings with the identified stakeholder authorities and other relevant bodies. For the sake of transparency it is also proposed that the notes of such meetings be reported back to the District Planning Executive Panel and made public on the Council's website.
- 3.0 Implications/Consultations
- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

None

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>People This priority focuses on enhancing the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable.</p> <p>Place This priority focuses on the standard of the built environment and our neighbourhoods and ensuring our towns and villages are safe and clean.</p> <p>Prosperity This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic and social opportunities.</p>
Consultation:	None
Legal:	N/A
Financial:	None Known
Human Resource:	None other than Planning Policy Team human resources.
Risk Management:	Failure to agree the recommendations contained in the report could lead to the District Plan being found unsound at Examination in Public.

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Guidance on the Duty to Co-Operate

This guidance note is presented in two parts: firstly, extracts from the relevant paragraphs of the National Planning Policy Framework (NPPF); and secondly, it provides background and interpretation of the Duty from the Planning Advisory Service (PAS) website.

Part 1: Extracts from the NPPF

The main extracts are provided below, with the relevant paragraph number shown. The NPPF can be viewed in full on the Communities and Local Government website at:

www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf

Strategic Priorities

156. Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

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Planning strategically across local boundaries

178. Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects

joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

179. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.

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180. Local planning authorities should take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should cooperate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. Local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers.

181. Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

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Examining Local Plans

182. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

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Part 2: Planning Advisory Service Guidance

A Simple Guide to Strategic Planning and the Duty to Co-Operate

<http://www.pas.gov.uk/pas/core/page.do?pagelid=2133454>

[accessed 17th September 2012]

Why is strategic planning important?

Many social, environmental and economic issues can only be effectively addressed at a larger than local scale. This is because people and businesses do not confine their activities to one council area. For example:

- employees may live in one area and work in another, sometimes travelling large distances on a daily basis suppliers may service many local shops from a small number of distribution centres linked to major transport hubs
- a retail development may attract customers from across a wide catchment area people may travel hundreds of miles to visit tourist attractions, leisure facilities or sporting venues on a regular basis

manufacturing companies may source materials and supply goods from across the UK and beyond.

Similarly, from an environmental perspective:

- residents in some areas may consume water and power that has travelled hundreds of miles surface water run-off in one location may present a flooding hazard to communities further 'downstream'
- water and air pollution may have a damaging impact on environmental assets some distance away

Local plans need to recognise these relationships and include policies to manage their impacts.

What is meant by the term 'strategic planning'?

Even local plan-making will have a 'strategic' element to it. However the term 'strategic planning' more commonly refers to describe policies that address larger than local issues that cannot be dealt with by one local planning authority working alone. For example:

- the provision for new housing across a major conurbation or wider housing market area
- the provision of major retail, leisure, industrial and other economic development across a travel to work area the provision of infrastructure for transport, waste treatment, energy generation, telecommunications, water supply and water quality requirements for minerals extraction the provision of health, security, and major community infrastructure facilities
- measures needed to address the causes and consequences of climate change, including managing flood risk and coastal change protection and enhancement of the natural and historic environment, including townscape.

The priority given to these issues will depend on local circumstances; strategic approaches may not always be needed. The sustainability appraisal scoping report should help to identify what is important for your locality.

What happens if strategic planning issues are not properly addressed?

Paragraph 179 of the NPPF requires councils to work together to address strategic priorities across boundaries and development requirements which cannot be wholly met within their own areas. Failure to do this will:

- lead to less sustainable plans
- reduce the ability to deliver infrastructure and inward investment
- undermine confidence in the ability of councils generally to make difficult political decisions and deliver on newly won freedoms

How was strategic planning done in the past?

Between 1974 and 2004, the strategic planning function was held by upper tier local authorities - county councils or unitary authorities. County Councils produced 'structure plans', which provided the strategic context within which local plans were developed by district councils. From the early 1990s onwards councils also collaborated to produce 'regional planning guidance' to inform the development of structure plans and unitary development plans. From 2004 strategic planning moved to a fully regional model with the establishment of Regional Spatial Strategies and in 2009, Regional Strategies (which also incorporated the economic strategies of regional development agencies).

From 2008, the decisions on 'infrastructure of national importance' fell within the remit of a new 'Infrastructure Planning Commission' (IPC). The Government is publishing a series of national policy statements which are intended to establish the national case for infrastructure development and set the policy framework for infrastructure planning commission decisions

How will strategic planning be done in the future?

Section 109 of the Localism Act gives Government the powers to revoke the eight Regional Strategies outside London following completion of an 'environmental assessment' for each. Within England but outside of London, most statutory plan making will be done by unitary, district or

borough councils. Authorities will be expected to address strategic issues through the 'duty to co-operate' set out in the Localism Act and described in the NPPF.

What does the duty to co-operate mean for Councils?

Section 110 of the Localism Act sets out a new 'duty to co-operate'. This applies to all local planning authorities, national park authorities and county councils in England – and to a number of other public bodies.

The new duty:

- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
- requires that councils set out planning policies to address such issues;
- requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies requires councils to consider joint approaches to plan making.

Co-operation on strategic issues is not new. Councils have a history of working together and with other bodies to address planning issues of common concern. For example:

- joint commissioning of evidence to inform individual core strategies on key issues (for example on population and household projections)
- 'aligned' plans across several local planning areas that include complementary policies on key issues (for example locations for strategic growth)
- a single plan across several local planning areas, overseen by each authority separately or by a joint committee

How will the duty to co-operate be tested?

The 'duty to co-operate' is a legal requirement of the plan preparation process. It is the first thing that the Planning Inspectorate (PINS) will look at. PINs will need to see sufficient evidence to demonstrate that the

'duty to co-operate' has been undertaken appropriately for the plan being examined. There is no fixed format for how this evidence should be presented, nor what it should comprise, but it should be:

- Succinct
- flow from the issues that have been addressed jointly
- highlight the practical policy outcomes that have resulted.

A 'tick box' approach or a collection of correspondence will not be sufficient.

Councils will also need to show how they have considered joint plan-making arrangements, what decisions were reached and why. Finally, councils need to report how the duty is being taken forward on an ongoing basis through the Annual Monitoring Report. Just because a local plan passes the legal test of the duty, it does not mean it will be found 'sound' in dealing with strategic matters. The policy outcomes of co-operation will need to be tested against the evidence at examination in the normal way.

What happens if a council or identified public body will not co-operate or cannot agree?

Co-operation works two ways. Situations may arise where an invitation to co-operate is not accepted, or agreement on shared policy outcomes cannot be reached.

Where co-operation is not forthcoming, PINs are likely to consider the extent to which the request to co-operate is 'reasonable' based on the evidence. If the deliverability of the plan is dependant on a reasonable request for co-operation by the plan-making body that is not forthcoming, the plan may still be found unsound unless some form of working arrangement can be brokered.

If PINs consider that the legal requirement to co-operate has been met through joint working but there is disagreement about the policy outcome (for example the proposed level of housing provision), then this will need to be resolved through the examination process based on the evidence.

All of these scenarios will cause delay and uncertainty and should be avoided if possible. Councils and other public bodies covered by the duty should make every effort to ensure that strategic issues are properly addressed at the formative stages of the plan preparation process, and that any major disagreements are resolved well before the examination.

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL - 28 NOVEMBER 2012
EXECUTIVE – 4 DECEMBER 2012

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING
AND TRANSPORT

DISTRICT PLAN PART 1 – STRATEGY SUPPORTING DOCUMENT:
MEMBER COMMENTS

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report details the issues raised in the responses made by Members following the District Planning Executive Panel held on 26th July 2012, in respect of the feedback period agreed regarding agenda items 8, 9 and 10, together with additional matters raised regarding agenda items 6 and 7 and other general issues.

RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:

- | | |
|-----|--|
| (A) | the responses made by Members in respect of agenda items 6 to 10 of the District Planning Executive Panel on 26 July 2012 be noted; and |
| (B) | the Officer responses to the comments made and any consequent amendments to the District Plan: Part 1 - Strategy Supporting Document be supported. |

RECOMMENDATIONS FOR COUNCIL: That:

- | | |
|-----|---|
| (A) | the responses made by Members in respect of agenda items 6 to 10 of the District Planning Executive Panel on 26 July 2012 be noted; and |
| (B) | the Officer responses to the comments made and any consequent amendments to the District Plan: Part 1 - Strategy Supporting Document be agreed. |

1.0 Background

1.1 At the Meeting of the District Planning Executive Panel held on 26th July 2012, a period for Member comment until 31 August 2012 was agreed for three agenda items. The issues that these involved comprised:

- Agenda Item 8: District Plan Part 1 – Strategy Supporting Document:

Update Report on the proposed Appendix B: Documents and Feedback;

- Agenda Item 9: District Plan Part 1 – Strategy Supporting Document – Material Changes to Draft Topic Assessments:

The proposed Material Changes to the Draft Topic Assessments attached at Essential Reference Paper ‘B’; and

- Agenda Item 10: District Plan Part 1 – Strategy Supporting Document – Chapter 4: Places, and Next Steps:

The factual content of Essential Reference Papers ‘B’ and ‘C’ of the report submitted.

2.0 Report

2.1 In response to the invitation to Members to submit comments at the meeting of the District Planning Executive Panel held on 26th July 2012 on the above three agenda items, comments have been received by the Planning Policy Team from six Members, comprising Councillors: Bull, Jones, Newman, Page, Poulton and Woodward.

2.2 The majority of the comments made specifically relate to agenda items where a response was invited. However, other observations relating to additional agenda items (namely, 6: Sub-District Population and Household Forecasts – Parish Groupings and Towns: Phase 1 (May 2012); and, 7: Strategic Land Availability Assessment – Stage 2 – Update Report) were also received, along with remarks relating to more general issues concerning the development of the Plan.

- 2.3 It is acknowledged that these additional comments fall outside the range of the agreed agenda items. However, it is considered that in this instance, it would be appropriate for the scope to be expanded to address them. This is to ensure that a more complete understanding of the issues raised at this stage can be reached, which should thereby avoid the potential need to address these points at subsequent stages of Plan development.
- 2.4 A schedule summarising the comments received from Members and the Officer responses to them is included at **Essential Reference Paper 'B'**.
- 2.5 In each case where a change to the District Plan Part 1 - Strategy Supporting Document is to be considered, the details of where this would occur and suggested text revision have been stated.
- 3.0 Implications/Consultations
- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

Papers of the District Planning Executive Panel agenda – 26th July 2012
<http://online.eastherts.gov.uk/moderngov/ieListDocuments.aspx?CId=151&MId=2025&Ver=4>

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>People This priority focuses on enhancing the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable.</p> <p>Place This priority focuses on the standard of the built environment and our neighbourhoods and ensuring our towns and villages are safe and clean.</p> <p>Prosperity This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic and social opportunities.</p>
Consultation:	None
Legal:	N/A
Financial:	None Known
Human Resource:	None other than Planning Policy Team human resources.
Risk Management:	N/A

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ESSENTIAL REFERENCE PAPER 'B'

July 26th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
6 Sub-District Population and Household Forecasts.	Questioned soundness of approach to future housing growth. In referencing NPPF (paragraphs 47 and 159), notes that the essence of this is that supply should meet need, rather than work undertaken by EHC, proposing to base future housing growth on past trends. While homes built over the past five years are occupied, this does not confirm local demand for that number and that there would be a similar need over the next five years; only that developers found buyers for them. The extent of local need for any more or less remains undetermined.	Cllr Newman	<p>Not agreed that the use of Population and Household Forecasting work is unsound since such work does in fact provide an identification of need. It involves extrapolating forward the current population of an area using a number of assumptions based on past demographic trends, including life expectancy, birth and death rates and levels of migration, in order to estimate the likely future population. Assumptions about household size and formation rates (also based on trends) are then applied to generate a future housing requirement. This is a standard and robust approach.</p> <p>Not agreed that Council is proposing to base future housing growth solely on past trends. The Council is testing trend based forecasts against national planning requirements and the physical and environmental capacity of the district (LDF Executive Panel Item 7, Paragraph 2.18, 29 March 2012).</p> <p>The 'trend led' demographic information is</p>

July 26 th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
			<p>'Phase 1', i.e. projecting forward existing demographic data such as existing population statistics, whilst 'Phase 2' will test a range of 'policy drivers' alternative dwelling based scenarios. This will enable comparison of possible housing targets against 'trend-led' scenarios to understand the implications, including potential demographic and housing implications of meeting those housing targets (District Planning Executive Panel Report Item 6, paragraph 4, 26 July 2012).</p> <p>NPPF paragraph 159 states that local planning authorities should <i>'meet household and population projections, taking account of migration and demographic change [...and cater...] for housing demand and the scale of housing supply necessary to meet this demand'</i>.</p> <p>See also Agenda Item 5 to this meeting entitled: Sub-District Population and Household Forecasts – Parish Groupings and Towns: Phases 1 and 2 (October 2012).</p> <p>Not agreed that the fact that homes built over</p>

July 26 th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
			<p>the past five years are now occupied is not a reflection of local demand. On the contrary, it is a reflection of demand, even if this demand has not been generated by what could be called the 'indigenous' population. The NPPF does not require local demand to be met: rather it requires the scale of housing that the local population is likely to need over the plan period to be met by catering for housing demand. Such demand is generated both locally and through migration.</p>
6 Sub-District Population and Household Forecasts.	<p>Despite assertions that the forecast methodology is robust, the simplistic extrapolations substantially reflect previous growth in housing numbers. It is not clear how the forecasts could be used without resulting in misleading interpretations. As they stand, the population forecasts are likely to be challenged.</p>	Cllr Jones	<p>Not agreed. The Population and Household Forecasting study is robust. It uses the accepted and widely-used methodology for calculating future populations used by the Office for National Statistics (ONS).</p> <p>It involves extrapolating forward the current population of an area using a number of assumptions based on past demographic trends, including life expectancy, birth and death rates and levels of migration, in order to estimate the likely future population. Assumptions about household size and formation rates (also based on trends) are</p>

July 26 th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
			<p>then applied to generate a future housing requirement. This is a standard and robust approach.</p> <p>NPPF paragraph 159 states that local planning authorities should <i>'meet household and population projections, taking account of migration and demographic change [...and cater...]' for housing demand and the scale of housing supply necessary to meet this demand'</i>.</p> <p>See also Agenda Item 5 to this meeting entitled: Sub-District Population and Household Forecasts – Parish Groupings and Towns: Phases 1 and 2 (October 2012).</p>
6 Sub-District Population and Household Forecasts.	Population growth – having a range of scenarios with rationales welcomed, but it would be reasonable to discount extrapolating the future from the past high migration driven growth as the 'one off' of inward migration from the EU is unlikely to re-occur and improvements in economies are now likely to generate outward migration from Polish and Brazilian groups given the long term prognosis for the UK economy.	Cllr Woodward	<p>Noted. This point emphasises the distinction between technical work that simply states that based on x population today, the population in 2031 will be y, and the District Plan work to interpret and understand both the inputs and outputs of the technical work.</p> <p>The range of scenarios enables the impact of high-levels of migration to be taken into</p>

July 26 th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
6 Sub-District Population and Household Forecasts.	We also need to take account of demographics. For example, with an ageing population we need to plan old age friendly dwellings, (private as well as social provision). Bungalows with well sited gardens may not be in vogue but could encourage older residents to downsize and free up existing housing stock elsewhere.	Cllr Page	account. Agreed that the District Plan must take into account the specific housing needs of older people, including in respect of the likely future population age structure as well as the type of housing that may be suitable. To this end, East Herts Council has commissioned a specific older persons study as part of the refresh of the Strategic Housing Market Assessment (SHMA). A supply of suitable accommodation targeted to older people could indeed, encourage older people to downsize.
6 Sub-District Population and Household Forecasts.	Suggestion that reliable and well-established Housing Needs Assessment be undertaken, i.e. to ask local people how the needs of themselves and their families are liable to change over the period of review. With a more reliable method of determining need in common usage EHC may be shown to be at fault for using an alternative and less robust approach.	Cllr Newman	Not agreed. Housing Need Assessments/Surveys have been replaced by Strategic Housing Market Assessments (SHMA) as current best practice and are now a requirement of the NPPF. The reason for their replacement was that such surveys were overly aspirational and 'time sensitive' and did not provide an accurate indication of housing need over the long term. East Herts Council has undertaken a SHMA as part of the London Commuter Belt (East)/M11 Sub-region in 2010 and this study is currently being refreshed to ensure it is up-to-date.

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6 Sub-District Population and Household Forecasts.	Sub-District Population etc Forecasts, Phase 1 – the ‘rural hinterland’ mentioned on p33 of item 6 and shown in the Edge work is not the natural ‘hinterland’ of Bishop’s Stortford. Some of it does not share a common post coding and is related to Ware or Stevenage. The infrastructure of Bishop’s Stortford is far more affected by planning and development issues in its natural hinterland of West Essex/Uttlesford. The work to date may not demonstrate this. The map on page 13 (56 of item 6) of the Edge work graphically illustrates the misalliance and when read in comparison to p14 (57 of item 6) shows that Ware (the correct post coding for much of the assumed East Herts hinterland of Bishop’s Stortford) actually has very high ‘net migration’ figures which may influence the ‘Bishop’s Stortford and Northeastern’ assumptions rather than Bishop’s Stortford alone.	Cllr Woodward	<p>Not agreed. It is accepted that the natural hinterland of Bishop’s Stortford extends into much of western Essex as well as eastern Herts, and this is a general issue, not specific to this study, that originates from the fact that historic and administrative boundaries do not necessarily reflect functional boundaries. The Greater Essex Population and Household technical work was undertaken jointly with a number of local authorities (including both East Herts and Uttlesford) and sought to overcome this by considering demographics across local authority boundaries.</p> <p>It is accepted that the Bishop’s Stortford and Northeastern parish grouping contains SG as well as CM postcode areas (relating to Stevenage and Chelmsford, respectively).</p> <p>The Sub-District work is actually based on the housing market areas identified in the Strategic Housing Market Assessment (SHMA) that was also undertaken jointly across local authority boundaries. These housing market areas represent the most up-to-date information in respect of functional areas</p>

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			<p>within which people are likely to live, work and move house.</p> <p>It should also be stressed that the post-codes have no bearing on the forecasting work: which is based on demographic data at parish, ward and ONS output area level. Thus the presence of a Ware postcode in the Bishop's Stortford parish grouping is irrelevant. Growth in Ware is contained within the Ware parish grouping and has no bearing on the Bishop's Stortford parish grouping.</p>
6 Sub-District Population and Household Forecasts.	Acknowledged that social housing has an important role to play in providing young families with homes of their own, and must continue to do so. However, the temptation to provide a cheap option in a cramped environment must be resisted.	Cllr Page	Agreed. The District Plan will seek to promote high quality, well designed and liveable homes and neighbourhoods, for all tenures.
6 Sub-District Population and Household Forecasts.	Demographics also dictate that schools' provision has to be improved if new developments of any significant size are to be sustainable. It is unfortunate that national government has delayed a decision on the way forward in Bishop's Stortford. This key decision prevents a holistic view being taken.	Cllr Page	Noted. The Secretary of State's decision has now dismissed the appeals in respect of schools in Bishop's Stortford. East Herts Council is working with Hertfordshire County Council as the local authority responsible for education to resolve education issues in the District to 2031.

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7 Strategic Land Availability Assessment – Stage 2	Government is not helping resolve the Plan by delays on various key Planning matters, so it is accepted that ‘all scenarios’ have to be considered (e.g. the housing estimates of the East of England Plan); but EHC must get better at communicating this dilemma to the populace who are under the impression that excessive house building is the desire and intent of EHC.	Cllr Woodward	Noted and acknowledged. It is hoped that Members will assist in ‘getting the message across’. However, Members must also understand that Paragraph 47 of the NPPF is explicitly clear: <i>‘to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local [District] Plan meets the full, objectively assessed needs for market and affordable housing’</i> .
7 Strategic Land Availability Assessment – Stage 2	Considered that site 45/003 Land at 22 Great Innings North could accommodate more than three dwellings.	Cllr Poulton	Noted. The interim SLAA site assessments have been refined following stakeholder engagement and the estimated capacity for this site has been amended from three to four dwellings. However, it is important to note that the dwelling numbers contained in the SLAA assessments are just an estimate of the dwelling capacity of each site. They are not intended to be viewed as either a maximum or minimum capacity. The actual number of dwellings that can be delivered on a particular site can vary greatly depending on the size

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			and type of housing proposed. The suitability of a particular scheme, and consequently the number of dwellings that a site can accommodate, will be assessed in greater detail through the planning application process.
7 Strategic Land Availability Assessment – Stage 2	The driving force seems to be, build as many homes as possible to assuage East Herts interpretation of national government policy. This view is reinforced by the SLAA rationale presented by officers and the upward revision of housing densities which could enable a "green light" to be given to open up even more house building in villages and hamlets, as well as in towns.	Cllr Page	<p>Not agreed. In respect of housing, the NPPF is clear: to boost significantly the supply of housing (paragraph 47).</p> <p>The SLAA should not be confused with the District Plan process; they are separate, distinct projects, albeit that the SLAA will inform the preparation of the District Plan.</p> <p>The SLAA is a piece of technical work that assesses the likelihood of a site coming forward for development. It is about whether a site could, <i>not should</i>, be developed taking account of the current market. The rationale for doing the SLAA comes from the requirement in the NPPF to be able to demonstrate a continuous supply of housing to ensure that the District's housing target is achieved.</p>

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			<p>In respect to the issue of density, this relates to the planning assumptions used as part of the District plan process.</p> <p>The change from 20dph to 25dph better reflects the reality of development at a very wide scale of 500 to 2,000 dwellings. However, the figures are just indicative and in order to move forward it is necessary for plan-making purposes to base assessments on a set of realistic assumptions: 25dph being considered more realistic. It should also be noted that these figures are gross rather than net and at the scale they are being used at include an allowance for non-residential development.</p>
7 Strategic Land Availability Assessment – Stage 2 Para 2.3	Questioned why the ASRs do not fall within the settlement boundary of Bishop's Stortford as considered in reality they do. Implication on Bishop's Stortford for total housing numbers if these figures are excluded also questioned. Would there then be technical pressure for further development in Bishop's Stortford to satisfy its own housing non-migration growth requirements?	Cllr Woodward	Not agreed. SLAA Phase 2 considers sites within existing 2007 Local Plan Settlement boundaries where there is no in-principle objection to development. SLAA Phase 3 will in due course consider in more detail sites on the edge of settlements and elsewhere in the district, dependent on the Preferred Development Strategy. Bishop's Stortford North, whilst 'safeguarded land' for future

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			<p>development, is regarded as outside the current settlement boundary for policy purposes and is therefore being considered along with other potential greenfield/Green Belt option locations.</p> <p>In respect of housing numbers, the assessment of Bishop's Stortford North is being considered through the District Plan, in the same way as all of the other potential broad locations. Any development at Bishop's Stortford North would be deducted from the District housing requirement.</p>
9 Material Changes to Draft Topic Assessments	Clearly the Plan needs to be robust but that is not as yet demonstrated fully by some of the apparently subjective and arbitrary Planning expert 'traffic light' assessments. The difficulty of making formulaic assessments is appreciated, but without demonstrable rigour in this area the ultimate Plan will not have local support as it will be viewed as an imposition by those that neither know or care about the realities on the ground and who probably don't have to live with the consequences.	Cllr Woodward	In the absence of specific examples of which of the traffic light assessments are 'apparently subjective and arbitrary', it is not possible to respond meaningfully to this representation. However, in respect of the traffic light assessments generally, it should be recognised that these have been developed to provide a framework that ensures that all Areas of Search are considered under the application of equal criteria. These criteria have been developed in conjunction with statutory authorities and other bodies, as

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			appropriate, and are considered to be fit for purpose.
9 Material Changes to Draft Topic Assessments	The change to the Land Availability Topic Assessment for the Buntingford North-East Area, (reference 02/004) from Red to Amber, should not have been made because this is based on an increase in assumed gross density of development, which could not be achieved by an acceptable form of development in this Area because of the necessity for any development to include significant infrastructure provision and other constraints. This situation is also known as a result of pre-application consultations, and it is important that this specific Area remains Red in the 'traffic light' assessment of land availability, as a sounder basis for findings in Sieves 1 and 2.	Cllr Bull	<p>Not agreed. The land available for development within this Area of Search fulfils the amber traffic light criteria under the Land Availability assessment. The assessment has changed from red to amber due to a change in the planning assumption used regarding the density and scale of growth for areas of search located on the edge of existing settlements from 20dph to 25dph. This is considered to be a more realistic planning assumption for development at a very wide scale of 500 to 2,000 dwellings.</p> <p>It should be noted that the amber rating given is based solely on an assessment of the Area of Search in terms of 'known' land availability. For the purposes of this specific topic assessment, no consideration has been given to the level of infrastructure required at each individual Area of Search and how this will affect the overall density of development that can be achieved within a particular Area of Search. It is acknowledged that in reality a</p>

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			variety of different densities are likely to be appropriate across each Area of Search dependent on several factors. In addition, no regard has been paid to individual developer plans for particular sites at this stage. However, all of these factors will be considered through the stepped approach being taken to the formulation of the District Plan and will be reflected in the final development strategy.
9 Material Changes to Draft Topic Assessments	The change to the Boundary Limits Topic Assessment for the Buntingford South and West Area (A) is inconsistent with wording for other areas where there are no clear boundary limits. The words “but there are no clear boundary limits to this area” need to be added at the end of the revised version in the Reference Paper.	Cllr Bull	Partial agreement. Suggested change to: If development was located to the north of the A507, there are clear possible boundaries to development based upon the Buntingford Business Park boundaries. If development was located to the south of the A507, there are minor field boundaries and a small woodland that could form a partial boundary feature, however depending upon the extent of development there would be no clear boundary limits in this area.
9 Material Changes to Draft Topic	The change to the Boundary Limits Topic Assessment for the Buntingford South and West Area (C) is inconsistent with wording for other areas, and the word “clear” needs to be inserted	Cllr Bull	Agreed. Assessment to be changed to incorporate additional word.

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Assessments	so that the revised version reads "...there are no existing clear boundaries that could limit development".		
9 Material Changes to Draft Topic Assessments	The Noise Impacts Topic Assessment for Areas 5 to 9 does not address the impact of aircraft flightpaths to Luton Airport on Buntingford, and this should be recognised by the assessment in order to be consistent when comparing different Areas of the District. Rather than replacing the flightpaths criterion with a noise level criterion in the assessment, as proposed by the Revised Wording in the Reference Paper for other towns in the District, there should be a criterion that reflects the current and future impact of aircraft on potential development areas other than in close proximity to mapped noise contours. This would improve consistency with other areas, including those north of Harlow, which are 'distant from the 60 decibel noise contour' and have been scored as Amber.	Cllr Bull	<p>Not agreed. The Noise Impacts Topics Assessment clearly sets out the basis for this topic assessment, including making the clear distinction between aircraft noise contours and flightpaths. The 60 decibel standard used is considered to represent the desirable upper limit for major new noise sensitive development. The Council has no evidence or justification to propose a different standard and this would be likely to result in greater chance of being found unsound at Examination in Public.</p> <p>Both Buntingford (south and west) and North of Harlow (B and C) have been classed as amber on the basis of the proximity of dual carriageways (the A10 and the A1414 respectively). This is a consistent approach with that applied to the other Areas of Search.</p>
9 Material Changes to	There is an important error in both the Transport Access Topic Assessment for Buntingford Area 8: Sub-Area B and Chapter 4 Sieve 1, paragraph	Cllr Bull	Agreed. For this area the A10 improvements would not be required and latest advice from Hertfordshire County Council, as Highway

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Draft Topic Assessments and 10 Chapter 4: Places, and Next Steps (ERP B Section 4.5.5.11)	4.5.5.11 for this Area, where the proposed wording states that “Highways infrastructure works would also be required including to enable access from the A10 from a northerly direction”. Such access from the A10 to this sub-area is known to be impossible, even in the long term, as a result of the land required not being available for such an access, and the environmental, land ownership and physical constraints would prevent an acceptable upgrade of existing road access from this direction. The traffic light for criterion A (access to primary road network) should therefore be Red not Amber.		<p>Authority, concludes that “it is reasonable to serve the search areas from A10 via existing B1038 Baldock Road /High Street/Hare Street and London Road/Hare Street”. Therefore, the Topic Assessment should be revised to omit the first section and, as previously agreed, the remaining paragraph would state:</p> <p>Would require upgrade of staggered junctions at Hare Street Road/Station Road/High Street /Baldock Road to enable safety improvements.</p> <p>However, it should be noted that the traffic light assessment should remain as Amber due to the junction upgrades and safety improvements required in the locality and therefore would not be regarded as a material change.</p>
9 Material Changes to Draft Topic Assessments and	There are big unanswered questions over the provision of water services; there are serious doubts over the local availability of water supplies, as well as the capacity of local sewerage treatment. Where in the plan is there any analysis of the impact of new and proposed settlements at	Cllr Page	Not agreed. Water Treatment has been discussed at length with Thames Water and it has agreed that Bishop’s Stortford Treatment Works has capacity to accommodate the levels of proposed growth in Uttlesford District in addition to growth options at Bishop’s

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10 Chapter 4: Places, and Next Steps (ERP B)	Newport, Clavering, Stansted Mountfitchet, and Henham, and the demands that will be made on water extraction?		Stortford. The Environment Agency and Veolia Water (now Affinity) have been engaged throughout the process of strategy selection, and will continue to be engaged to ensure that the demands on infrastructure and the environment are managed. The impact of abstraction on the water environment is complex. For more information refer to Supporting Document Section 2.6: Water (LDF Panel, 29 th March 2012).
9 Material Changes to Draft Topic Assessments and 10 Chapter 4: Places, and Next Steps (ERP B)	I am worried about the crafting of road transport links into the topography of Bishop's Stortford. I fear that by ignoring the potential to upgrade the A120 between the M11 and the A10, we are missing out on alleviating pressure on road infrastructure locally, and depriving the East Herts area of economic benefits which a major artery connecting with Stansted Airport would bestow. Furthermore, there has been no substantial planning of district wide public road transport written into the document.	Cllr Page	It is recognised that any new development in the district would seek to respect the topography of the given area in planning for all transport modes. In terms of the matter of the potential to upgrade the A120, it is agreed that this will be subject to further investigation. This is recognised as an important issue and the level of enhancement required will largely be determined by the Highway Authority's assessment of the impact of the development proposals in the District Plan: Part 1 - Strategy on the road network and what mitigating measures would be most appropriate.

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			<p>Passenger transport is a key element of the Plan and has been detailed as such throughout the process. Ongoing liaison with the Transport, Access and Safety section (TAS) at HCC (formerly the Passenger Transport Unit (PTU)) and service providers has been crucial in helping to establish the most sustainable locations for future development, in order to ensure that the existing network can be both maintained and enhanced. Additionally, the content of Hertfordshire's Local Transport Plan (the key steer in this area) and its daughter documents (including, <i>inter alia</i>, the emerging Inter Urban Route Strategy) should be taken into consideration to ensure conformity.</p>
10 Chapter 4: Places, and Next Steps (ERP B Conclusions Table: Area 8:	Due to comments made, the Conclusions table for Area 8: Buntingford North-East showing Sub-Area B should result in a 'Marginal Fail' for both the 'Fewer than 500 dwellings', and 'Sieve 1 Rating' categories in the table in order to be consistent with the categorisation of other areas in the District.	Cllr Bull	Not agreed. The interim assessments have been derived by balancing up the specific issues in specific locations. The conclusions for Area 8 are considered consistent with the conclusions for other areas in Buntingford and the District. The sieves represent the degree of confidence the Council has about the suitability of locations. Further sieves and

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Buntingford)			assessments are still to be undertaken, including based on additional information.
10 Chapter 4: Places, and Next Steps (ERP B Section 4.9.36)	Request for the main Stevenage sewer running along the whole eastern side of the boundary of Watton at Stone to be shown under red traffic light	Cllr Poulton	Not agreed. Thames Water has advised on this rating, and helped to develop the assessment criteria. The company does not believe that a red rating is merited because large-scale growth would make a replacement sewer financially viable, as stated in the topic assessment.
10 Chapter 4: Places, and Next Steps (ERP B Section 4.9.36)	Employment potential is rated as amber but the only site apparent for future employment is the "mill site" in Mill Lane. Therefore this should be a red traffic light as no other sites available that could be used.	Cllr Poulton	Not agreed. This assessment does not look solely at what employment land is available. It is about the potential success or viability if new employment land were to be located in the area. The "mill site" is vacant and partly derelict and not greatly accessible. Any alternative new site would be better located near to the A602 junction, benefitting from relatively quick access to Hertford and Stevenage via the A602 and via the rail line.
10 Chapter 4: Places, and Next Steps (ERP B Section	Access to Bus Services has a green traffic light, but knowledge of bus services and complaints from residents over the lack of buses suggests this should be an amber traffic light if not red.	Cllr Poulton	Not agreed. While there would certainly be scope for service enhancement, the village's current provision under the Access to Bus Services assessment [#] fulfils the green traffic light criteria:

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4.9.36)			<p>Areas with good access to existing bus services* and opportunities to link into/enhance existing provision.</p> <p>*The term 'existing bus services' includes both the provision of an adequate amount of bus stops to serve the area and a reasonable weekday frequency of service, including peak time provision, that would enable journeys to be made to a range of destinations (either directly or via links to other points that would facilitate wider travel options available).</p> <p>#Services available between Ware/Stevenage hourly (390); Stevenage/Hertford twice daily, except Sundays (383); and Welwyn Garden City (203) one off peak return journey Thursdays only. Probable on-going subsidy would be required to enhance service provision.</p>
10 Chapter 4: Places, and Next Steps (ERP B	Mr Abel Smith, a landowner of large plots of land in the village, has pledged to create a twenty acre woodland site stretching on the eastern side of the village from Walkern Road in the north to the other side of Mill Lane on the south. This twenty	Cllr Poulton	Noted.

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Section 4.9.36)	acre site is being created with the help of the Woodland Trust to commemorate the Queen's Diamond Jubilee		
10 Chapter 4: Places, and Next Steps (ERP B Section 4.4.3.6)	The comment at 4.4.3.6 regarding opening the A120 by-pass to ASR access could do with indications of what EHDC might regard as 'essential' criteria as this must not be conceded lightly. Clearly there are already several roundabouts on either end the A120 and arguably other breaches on the A1184, which serves to continue the by-pass around BS, and that are direct from housing developments e.g. Bishop's Park and St Michael's Mead. If such a breach is countenanced then there must be adequate legal safeguards to stop development creep across the other side of the A120 especially noting the comments about New Settlement Area 4.	Cllr Woodward	<p>Agreed that this must not be conceded lightly. However, the decision will need to be based on the NPPF, including Paragraph 14 which states that objectively assessed development needs must be met unless "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."</p> <p>A new adopted District Plan will be able to steer development to sustainable locations and the Council will be in a strong position to prevent 'creep' elsewhere.</p> <p>The A1184 is a different category of road to the A120. The A120 is a primary route, whereas the A1184 is a distributor road, specifically designed to allow more access, in this instance to Bishop's Park and St. Michael's Mead.</p>
10	Caveat at 4.4.3.13 about the, 'risk that growth	Cllr	Noted. The 'golden thread' in the NPPF is the

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Chapter 4: Places, and Next Steps (ERP B Section 4.4.3.13)	could become unsustainable' welcomed, but EHC should make Bishop's Stortford public more aware that this is noted by our Planners as the contrary perception seems to be widely held.	Woodward	'presumption in favour of sustainable development', which suggests that growth should be focused on the most sustainable locations.
10 Chapter 4: Places, and Next Steps (ERP B Section 4.4.4.13 onwards)	4.4.4.13 and onwards regarding BS East Sub-Area A. Noise from the A120/M11 and the Dunmow Rd, Brake Bros site, and BS Football Club are already issues. Therefore any presumption in favour of more employment use must consider noise impacts on the existing extensive residential community. Traffic is also a concern particularly as most secondary school commutes are from residential areas where the town has been permitted to expand on the west across to schools located in the east, (three in All Saints Ward).	Cllr Woodward	The noise impacts issue is noted, although this is a detailed matter that is more likely to be addressed through Part 2 of the District Plan, and then through the planning application process. Traffic issues are also noted. Transport modelling is being undertaken to look at these impacts, and advice from the County Council is being provided throughout the strategy selection process.
10 Chapter 4: Places, and Next Steps (ERP B Section 4.4.6.12)	4.4.6.12 Next Steps. There is a clear contradiction in the comment about the value of Cannons Mill Lane rail crossing and the action already taken by EHDC on Johnson's Crossing sale of land, which contained support for closure of Cannons Mill Lane. Also, note the carte blanche exemption from enforcement granted by Development	Cllr Woodward	Not agreed. While the content of Non-Key Report 12/14E is exempt information (as the details of terms agreed are confidential relating to the sale of two small parcels of land adjacent to Johnsons Crossing, Bishop's Stortford), the only reference in the report to the Cannon's Mill Lane crossing states that it

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	Control before a formal planning application or any local consultation on the desirability of the building of a huge bridge. That action has re-enforced the perception of not being mindful of local opinions which is unhelpful to this District Plan process.		<p>does not form part of the report.</p> <p>It is therefore considered that there is no contradiction between the two.</p> <p>The Development Control Committee resolution was made in light of specific exceptional circumstances relating to a child's death at Johnson's Crossing.</p>
10 Chapter 4: Places, and Next Steps (ERP B)	<p>The purpose of this stage of work has been to 'sieve' - in three stages - the previously-identified 69 Areas of Search down to a more manageable number for further assessment.</p> <p>However the underlying detail of how planners have reached their conclusions is not described. Moreover it is not sufficient to claim, simply, that the conclusions have been reached using professional judgment. There is need for absolute clarity and transparency in the process in order that the conclusions should withstand scrutiny by both independent experts and the public.</p> <p>The conclusions include, for example, that lack of</p>	Cllr Newman	<p>The approach taken reflects best practice, with clear criteria providing the basis for judgements which can then be balanced, taking account of the distinctive issues in each specific locality. This is the essence of the method known as 'sustainability appraisal'.</p> <p>The Duty to Co-operate within the NPPF requires that local planning authorities work with relevant parties including infrastructure and service providers to assess such issues.</p> <p>It would be unreasonable for East Herts Council to disregard input from such bodies, for example Hertfordshire County Council and Thames Water, which have been involved in</p>

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	<p>provision for new schools is insurmountable and prevent an area being taken into further consideration, but lack of highways and sewerage infrastructures can <i>in some instances</i> be overcome and does not prevent an area being taken forward. Such conclusions are intuitively wrong, but if there is further evidence to support the assertion or other factors have been taken into consideration, then those need to be made available in order that the conclusions can be accepted. Similarly, it is concluded that development in some areas should be constrained because of its impact on rural landscapes, whereas other rural landscapes are considered of less value even though both have the same designation and have similar Landscape Character Assessment profiles. So on what basis have Officers reached their judgment?</p> <p>A specific area of concern is the sieving of the six candidate New Settlements (Areas of Search 64 - 69). Although a substantial body of textual analysis is provided against each of these, the conclusion that only one should be taken forward does not follow logically from that analysis; similar considerations apply to all of them and so a</p>		<p>ongoing discussions and have suggested the inputs and agreed the assessments presented to Members on the basis of their knowledge of their services.</p> <p>In terms of landscape character assessment, it is not clear from these comments which specific examples of inconsistencies are referred to, so it is difficult to respond. However, what is clear is that the landscape of the Stort Valley, for example, has been accorded very considerable importance, and for that reason a very large area of the Stort Valley, promoted by developers, with the exception of the redevelopment of Terlings Park, has been dropped out of the selection process at Sieve 1.</p> <p>In relation to the Hunsdon Area new settlement, this was retained for further assessment to enable a number of further tests. Firstly, to test the issue raised by the East of England Plan Panel, that development north of Harlow would constitute a 'new settlement'. A new settlement could compete with, and undermine, regeneration within</p>

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	<p>similar outcome of the sieving process should surely be reached. Again, if there is further evidence to support the assertion or other factors have been taken into consideration, then those need to be made available in order that the conclusions can be accepted.</p> <p>Overall I – and I am sure many others – find the lack of reason and consistency in the conclusions without explanation to be deeply troubling, and believe there is significant risk that enough well-considered public concern will be expressed as to lead an Independent Examiner to reach the same view.</p>		<p>Harlow.</p> <p>If the East of England Plan Panel's conclusions are accepted, a development adjacent to Burnt Mill Roundabout on the A414, could be seen as a 'new settlement'. It would not necessarily be remote from Harlow.</p> <p>It is considered that the assessment in Panel Report 10, 26 July 2012, and summarised at page 494, New Settlements, sets out the key reasons why Hunsdon is carried forward and the A602 corridor is not, including for Hunsdon, as stated in the panel report, known single land ownership.</p> <p>The infrastructure to the south of the area is better than for that of other new settlement options. For example, it includes Harlow Town Railway station, the A414, and the trunk sewer which will need to be enlarged to accommodate development in east of Harlow in any case.</p> <p>It may be that confusion has arisen from the choice of the name 'Hunsdon Area'. However,</p>

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			on viewing mapped versions of this Area of Search (no 69) and Area of Search no 62: North of Harlow, it clear that there is a significant amount of over-lapping of the two. The Areas of Search are indicative of a wide expanse within which development of part/s could occur. Within each area the specific locations for development are not prescribed.
Other references not on July 26 th agenda – Chapter 2	Issues 2.6: Water. We are assured that the plan is 'an ongoing working document' and 'work in progress'. There have been significant water issues since the preparation of the chapter regarding water. In particular East Herts was one of the last areas to have drought restrictions removed. If this is a working document, although it is recognised that the issue of Water will be revisited in Steps 5 and 6, then there is a case for revisiting Chapter 2.6 to make reference to recent drought orders.	Cllr Jones	Not agreed. The main issue for plan-making is whether the Environmental regulator (i.e. the Environment Agency) considers that the environmental impacts are acceptable. Details of the latest drought orders do not materially change this consideration and there is not considered to be a need to revise Chapter 2.6 in this respect.
Other references not on July 26 th agenda – Vision	Vision for East Herts. There are increasing public concerns that the District Planning process appears to be proceeding without reference to a vision for East Herts over the planning period, and is merely a tool to justify continually increasing housing numbers. There	Cllr Jones	Visions for East Herts and each of the towns and the villages were part of the Issues and Options Consultation in Autumn 2010. These initial visions are being tested and refined through the strategy selection process,

July 26 th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
	may be a case to reconsider the content of parts of the District Plan structure to ensure that it considers in the broadest sense 'how places function and how they can and should evolve over time' (1.4.1)		and will form a key consideration in Chapter 6 of the Supporting Document. Like other topics such as infrastructure delivery, a vision of place emerges gradually through the iterative process of plan-making and testing. Chapter 4: Places contains much useful information in this respect.
Other references not on July 26 th agenda – General	The Local Plan is too narrow and insensitive to the needs and aspirations of local people. The connection between the LDF and the Council's corporate priorities/objectives are weak, and will need strengthening and safeguarding.	Cllr Page	The District Plan has endeavoured to take account of the needs and aspirations of local people as expressed in the feedback to the Issues and Options consultation. The approach to consultation is set out in Section 1. 8 (LDF Executive Panel, 29 th March 2012) The links between the Plan and Corporate Priorities was addressed in the Issues and Options document and is integrated into the whole strategy selection process. Checks on specific policies will be conducted in Chapter 7.
Other references not on July 26 th agenda	As the Local Plan remains a work in progress it is hoped that the Chairman's remarks embracing sustainable economic and environmental development across the District really will lead to	Cllr Page	Balance is the key word in this respect. Planning as defined by the NPPF is all about achieving a balance between competing demands, and attempting to reconcile them as

July 26 th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
– General	the best balance being achieved. However, I am fearful that funding and profit will be the keywords which take precedence.		<p>far as possible. The Council is constrained by what can be achieved by the requirements of the NPPF, which defines ‘sustainable development’ and requires local planning authorities to comply with the presumption in favour of sustainable development as the ‘golden thread’. The Council will seek to ensure that the balance is appropriate for East Herts. Deliverability and financial viability are central requirements of the NPPF, and will be thoroughly tested at Examination.</p> <p>The alternative to a plan within which development pressures can be managed, is to have no plan, in which such pressures cannot be managed and where development could occur in a haphazard manner.</p>
Other references not on July 26 th agenda – Bishop’s Stortford	Overall, insufficient weight is being given to new settlements adjacent to Bishop's Stortford, presumably because Essex links are not as strong as those in Hertfordshire. The outcome could be an infrastructure deficit which will be potentially damaging to the lifestyle of residents for years to come. It is both unfortunate and unacceptable that Bishop's Stortford, which is	Cllr Page	The Duty to Co-operate requires local planning authorities to consider cross-boundary considerations such as this. The impact of development in Essex is being given careful consideration in the plan-making process, and a number of issues are under investigation. The draft Uttlesford Local Plan contains proposals for development at Great Dunmow

July 26 th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
	likely to shoulder the heaviest responsibility for new housing, has no representation on the East Herts Council's Executive.		and Saffron Waldon but no new settlement at Elsenham. The comment about the membership of the Executive is a political matter beyond the scope of planning policy.
Other references not on July 26 th agenda – Bishop's Stortford	Despite my fears for Bishop's Stortford, and for East Herts missing an opportunity, there is undoubtedly room for expansion, and scope for macro ideas to embrace and capitalise on the economic powerhouse that is Stansted Airport. To freeze Bishop's Stortford in some kind of time warp is not an option for today's economically active population, or for our young people.	Cllr Page	Agreed that freezing any settlements in time is contrary to the whole planning system as currently constituted, which is designed to manage growth and development in a positive way, rather than attempting to prevent it. The other essential aspect to planning under the new system is democratic engagement, especially through representative organs such as those of local government, rather than through remote regional governments. Young people, and those too young to vote, are important stakeholders.
Other references not on July 26 th agenda – Bishop's Stortford	In Bishop's Stortford we have a great opportunity to "plan in" quality and distinctiveness on what is exclusively a large greenfield site. We can also be in the vanguard of building environmentally friendly settlements. This will come at a price which may be unpalatable to developers; therefore, there should be safeguards put into the	Cllr Page	Agreed. This sentiment appears to be in line with the requirement in the NPPF for a 'positive' approach to plan-making. Although the locations have not yet been agreed, it is clear that the requirements of the NPPF will necessitate East Herts Council identifying some greenfield sites in the District for future

July 26th DPEP Agenda Item	Summary of Issues Raised	Member/s Raising Issue	Officer Response
	plan to ensure that we, and our children, can be proud of any future developments.		<p>development.</p> <p>It is agreed that safeguards are an important part of plan-making, so long as they are considered reasonable and can be substantiated at Examination in Public. Members will have further opportunities to engage in policy-making and discussion of safeguards in due course.</p>

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL - 28 NOVEMBER 2012
EXECUTIVE – 4 DECEMBER 2012

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING
AND TRANSPORT

DISTRICT PLAN PART 1 – STRATEGY SUPPORTING DOCUMENT:
UPDATE REPORT

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report updates Members on progress with the District Plan Part 1 – Strategy. It explains the main issues impacting on the timeline for finalisation of the Draft District Plan for consultation. It presents a draft of the early sections of Chapter 5 of the Supporting Document. Finally, the report details further opportunities for District Members to get directly involved in the plan-making process.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE:</u> That:	
(A)	Essential Reference Paper ‘C’, illustrating the proposed approach to the remainder of the strategy selection process for the District Plan, be supported; and
(B)	Essential Reference Paper ‘D’, including the first three sections of Chapter 5: Options Refinement, be supported.
<u>RECOMMENDATIONS FOR COUNCIL:</u> That:	
(A)	Essential Reference Paper ‘C’, illustrating the proposed approach to the remainder of the strategy selection process for the District Plan, be agreed; and
(B)	Essential Reference Paper ‘D’, including the first three sections of Chapter 5: Options Refinement, be agreed.

1.0 Background

1.1 To date, the first four chapters of the draft Supporting Document have been agreed by the Council as follows:

- **Chapter 1: Introduction** explained the statutory framework for plan-making, including the scope of District Plans and Neighbourhood Plans, infrastructure planning, the approach to feedback from the Issues and Options consultation in autumn 2010, and sustainability appraisal.
- **Chapter 2: Issues** set out the scope of strategic planning considerations under headings including housing, economy, education, water, and so on. Chapters 1 and 2 were discussed by the LDF Executive Panel on 29th March, and on 4th April 2012 it was discussed by Executive and then agreed at the meeting of Full Council on the same date.
- **Chapter 3: Assessment Criteria** established 21 assessment topics. Chapter 3 was discussed and supported by the LDF Executive Panels on 29th March and 26th July 2012, by Executive on 4th April and 31st July, and agreed by Full Council on 4th April and 7th August 2012.
- **Chapter 4: Places** established 69 initial 'areas of search' for further assessment. It assessed all 69 areas of search in Sieve 1, at which point some options dropped out from further consideration. It then assessed all the settlements including wider strategic planning considerations including cross-boundary issues in Sieve 2, following which further options dropped out from consideration. Chapter 4 was considered and supported by the District Planning Executive Panel on 26th July, by Executive on 31st July, and agreed by Full Council on 7th August.

1.2 A summary of the shortlisted options and key points agreed by the Council so far is available at **Essential Reference Paper 'B'**.

1.3 As explained at the previous Panel meeting in July, compliance with the National Planning Policy Framework (NPPF) is likely to require the Council to take very challenging decisions. Failure to prepare a plan in accordance with the NPPF will result in a planning vacuum, and planning applications and appeals will be determined by reference to the NPPF rather than local policy.

2.0 Report

- 2.1 Version 3 of the Stepped Approach is presented at **Essential Reference Paper 'C'**. A number of changes are proposed to this document since the previous (July 2012) version, mainly reflecting a need to adapt the process because certain key pieces of information are not yet available.
- 2.2 Reflecting these changes, the remaining chapters of the Supporting Document are anticipated to be as follows:
- **Chapter 5: Options Refinement** will involve further information gathering and checks in respect of the remaining 'areas of search';
 - **Chapter 6: Strategy** will address NPPF requirements and assemble the information gathered into a proposal for a single coherent development strategy;
 - **Chapter 7: Policy** will address policy formulation and has been split out as a separate chapter to reflect its importance in the plan-making process;
 - **Chapter 8: Draft Plan** will present the consultation draft District Plan Part 1 – Strategy.
- 2.3 **ERP 'B'** also shows the consultation and engagement opportunities and the timeline for the remainder of the work.

Timeline

- 2.4 At the July Panel meeting it was proposed that the final strategy would be completed and presented to Members at the November Panel meeting and that consultation would commence in January 2013.
- 2.5 However, since that time, it has become clear that there are three main areas of work which need to be progressed further before a strategy can be finalised. These areas are as follows:
- **Schools Planning:** following the Secretary of State's decision in respect of the Bishop's Stortford Secondary Schools proposals, the County Council in consultation with the Bishop's Stortford Secondary Schools, need more time to understand how it could provide additional capacity to accommodate future development;

- **Highways Assessment:** Essex County Council needs more time to finalise the transport modelling for the Harlow-Stansted-Gateway-Transportation-Model (HSGTM) and then both County Councils need time to investigate the feasibility of any highways infrastructure which the model may indicate is necessary, and agree this with the Highways Agency;
 - **Viability Assessment:** the joint Hertfordshire Part 1 Community Infrastructure Levy (CIL) Viability study has now largely been completed. However, the NPPF makes clear that it is necessary for local planning authorities to assess the cumulative impacts of all their standards and requirements. Therefore the Council needs to complete a Part 2 Viability Study (currently underway), before it is in a position to reach a view about an appropriate 'basket' of planning policy requirements, including CIL, affordable housing, and sustainability and design costs, for example.
- 2.6 Additionally, the East of England Plan has not yet been formally abolished by the Government. It would be inadvisable for the Council to set out a District Plan which attempts to meet the requirements of both the NPPF and the East of England Plan, as this could undermine the soundness of the District Plan at Examination, once the regional plan is formally abolished.
- 2.7 Notwithstanding these additional considerations and requirements, the NPPF transitional period puts pressure on local planning authorities to get new plans in place and avoid 'planning by appeal' as implied by the Presumption in Favour of Sustainable Development (NPPF Paragraph 14).
- 2.8 At the same time, failure to engage positively with Hertfordshire and Essex County Councils in the above matters could result in the District Plan being found unsound, both in relation to the Duty to Co-Operate, as explained under Agenda Item 9, and also in terms of deliverability.
- 2.9 Although the NPPF does not require certainty about infrastructure delivery, it does require that local planning authorities demonstrate that there is a 'reasonable prospect that planned infrastructure is deliverable in a timely fashion' (NPPF Paragraph 177).
- 2.10 Taking all these NPPF requirements together, it is considered that a pragmatic way forward is to give both County Councils a limited

period of additional time to complete the required investigations in relation to highways and schools, sufficient to reach a reasonable level of confidence in respect of the likely outcomes. It will be made clear to both County Councils that the information is needed by the end of January 2013 at the latest in order for the District Council to comply with its statutory obligations.

- 2.11 The proposed timetable, involving consultation on the Draft Plan starting in April 2013, means that the Council will be able to attach some weight to the Draft Plan in relation to speculative planning applications, prior to formal adoption.

Chapter 5: Options Refinement

- 2.12 The introduction and first three sections of Chapter 5 are presented at **Essential Reference Paper 'D'**. As explained above, it is not currently possible to complete the sections on schools and highways because critical information is not yet available. The Habitats and Delivery sections cannot be completed until transport data and further highways information is available.
- 2.13 The Delivery section will also require the responses from landowner and developer questionnaires issued over the summer to be collated, properly scrutinised, and published on the Council's website.
- 2.14 As presented, Chapter 5 does not include further 'sieves' or assessment ratings, such as those used earlier in the strategy selection process. However, the same underlying principles of 'balance' and 'confidence' underlie all the assessments in the Supporting Document.
- 2.15 'Balance' is an important concept because "to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system" (NPPF Paragraph 8). This means that the strategy selection process for the District Plan must weigh up a very wide range of factors, including opportunities and constraints, which are likely to differ in their relative importance according to the location and the type of land use.
- 2.16 'Confidence' in this context describes whether, when assessed against the full range of NPPF requirements, there is a clear

balance of considerations against or in favour of development in a particular location.

- 2.17 If there is a high level of confidence early on that a particular area is not suitable, then it is not necessary to conduct exhaustive further investigation of that area. If, on the other hand, there are no clear grounds for rejection based on a particular assessment technique when assessed against NPPF requirements, it will then be necessary to use further techniques.
- 2.18 The early chapters of the Supporting Document provide a strong indication of the issues which require further assessment. However, only when the remainder of the evidence is available will it be possible to set out with confidence the specific locations which the balance of considerations indicates are suitable for future development. For this reason the interim work on Chapter 5 presented in ERP 'D' does not propose any conclusions at this stage.
- 2.19 The assessments contained in Chapter 5 relate to the Areas of Search and test dwelling assumptions agreed by Full Council on the above mentioned dates. Maps showing the Areas of Search are contained in an earlier Chapter within the Supporting Document.
- 2.20 For ease of reference the maps are reproduced in **Essential Reference Paper 'B'**, together with a summary of work to date. The dwelling numbers shown for each area and sub-area are for further testing purposes only, and inclusion of options in the list does not necessarily imply that any particular number or location will form part of the final plan.

Member Workshops

- 2.21 In order to assist Members in their understanding of the strategy selection process, and to seek further input to plan-making, two 'workshops' open to all District Members have been included as part of the overall work programme.
- 2.22 The first workshop concerned the strategy selection process, and was held on 8th November 2012. The second workshop will focus on strategic policies, in particular understanding the implications of financial viability requirements for policy choices. The date of the second workshop has been confirmed as 17th January 2013.

2.23 Any outcomes and further refinements arising from feedback from both workshops will be taken into account in the final stages of the strategy selection process.

3.0 Implications/Consultations

3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

Background Papers

Report to District Planning Executive Panel – 26th July 2012 Agenda Item 9: District Plan Part 1 – Strategy Supporting Document – Chapter 4: Places, and Next Steps

<http://online.eastherts.gov.uk/moderngov/ieListDocuments.aspx?CId=151&MId=2025&Ver=4>

Report to Local Development Framework Executive Panel – 29th March 2012. Agenda Item 7: Population and Household Forecasts and the East Herts Housing Requirement

<http://online.eastherts.gov.uk/moderngov/ieListDocuments.aspx?CId=151&MId=2024&Ver=4>

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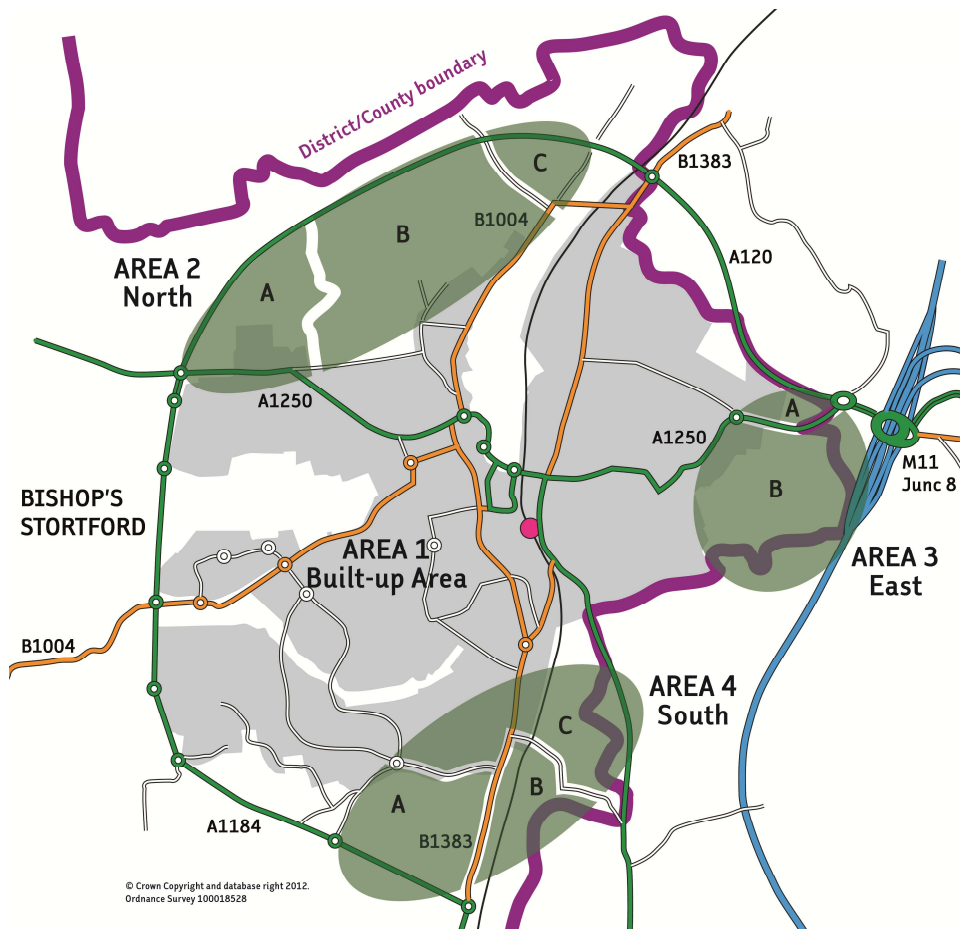
ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>People This priority focuses on enhancing the quality of life, health and wellbeing of individuals, families and communities, particularly those who are vulnerable.</p> <p>Place This priority focuses on the standard of the built environment and our neighbourhoods and ensuring our towns and villages are safe and clean.</p> <p>Prosperity This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic and social opportunities.</p>
Consultation:	None
Legal:	N/A
Financial:	None Known
Human Resource:	None other than Planning Policy Team human resources.
Risk Management:	Failure to agree the recommendations contained in the report could lead to the District Plan being found unsound at Examination in Public.

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Bishop's Stortford – initial Areas of Search (7th April 2012)



Shortlisted Options (7th August 2012)

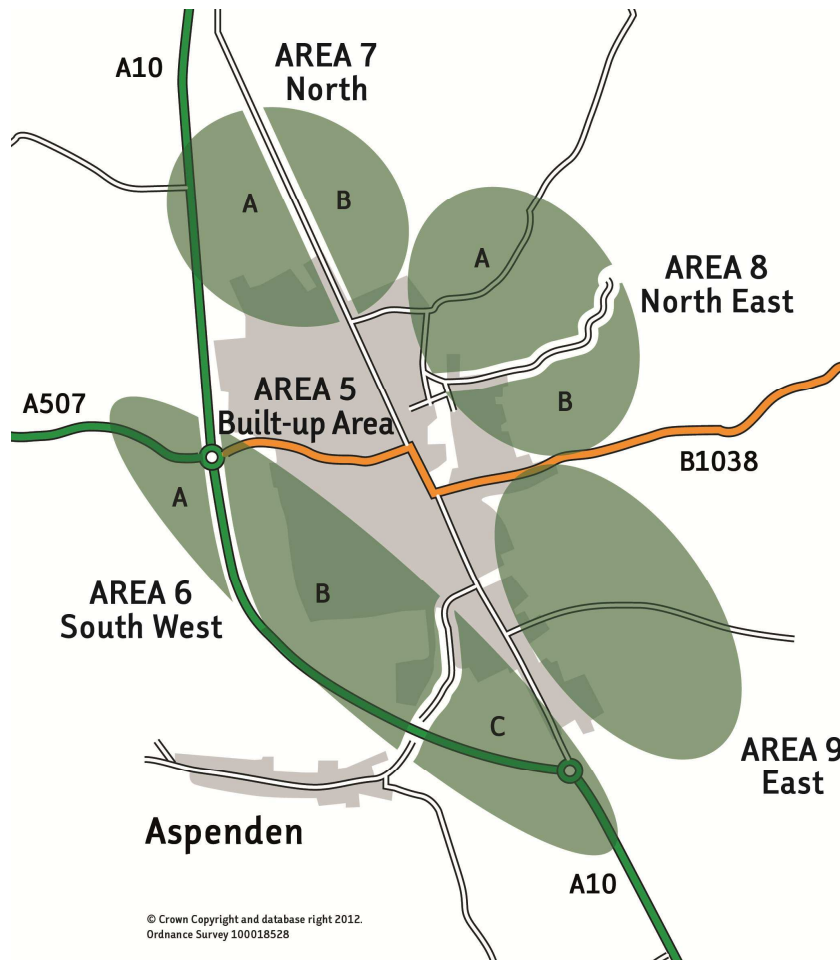
Area	Remaining Options/Sub-Areas	Dwellings
	Discounted options: 3A, 4B, 4C	0
1	Built-Up Area	1,233
2	North (A, B and C)	2,500
3	East (B only)	150
4	South (A only)	800
MAXIMUM TOTAL		4,683

Key points from the assessment so far (7th August 2012)

- Good location for employment due to access to M11 and Stansted airport
- Principal Town Centre including extension to cover the Goods Yard and Station
- A1184/A120 could form a clear boundary to development
- Congestion issues in the town
- Lack of schools capacity

(Dates agreed at Full Council are shown in brackets)

Buntingford – initial Areas of Search (7th April 2012)



Shortlisted Options (7th August 2012)

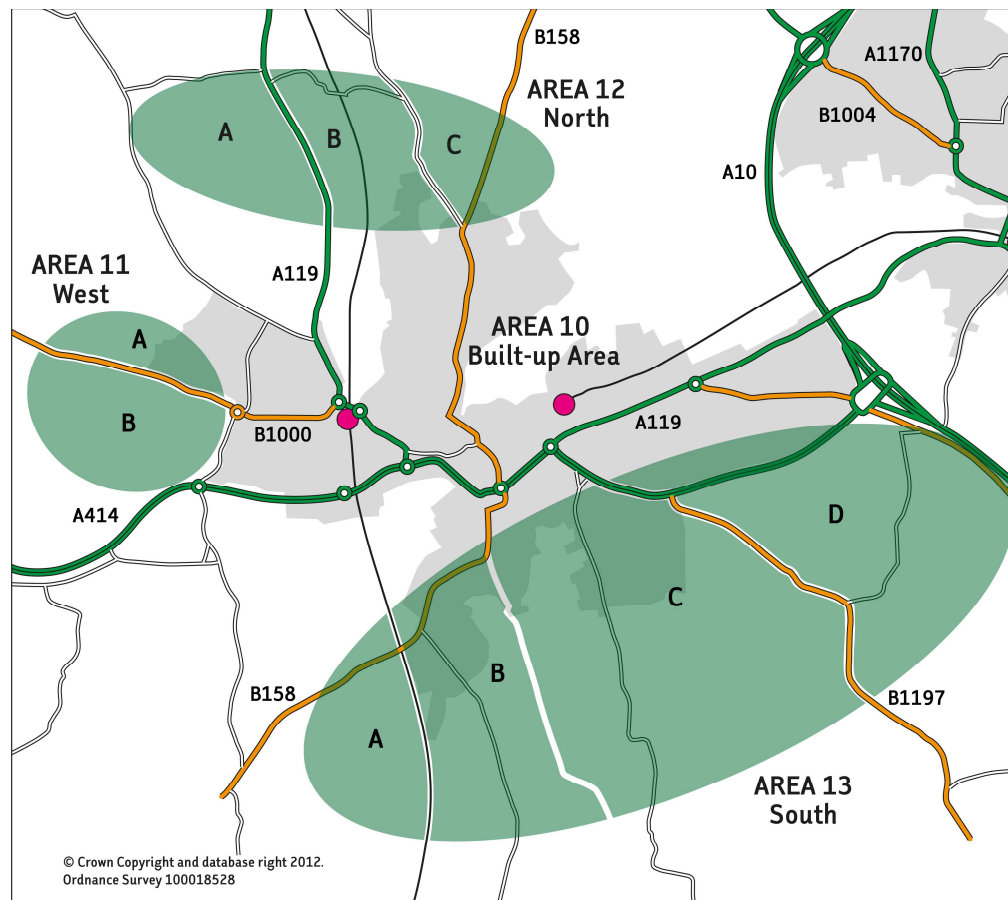
Area	Description/Sub-Areas	Dwellings
	Discounted options: areas 6A, 7B, 8A	0
5	Built-Up Area	67
6-9	Spread of development within areas 6B&C, 7A, 8B and 9, at various levels possibly up to 2,000 dwellings.	Up to 2,000
MAXIMUM TOTAL		2,067

Key points from the assessment so far (7th August 2012)

- Minor Town Centre
- Mostly local-level employment
- A10 boundary limit to the west
- Valley landscape
- Lack of schools capacity

(Dates agreed at Full Council are shown in brackets)

Hertford – initial Areas of Search (7th April 2012)



Shortlisted Options (7th August 2012)

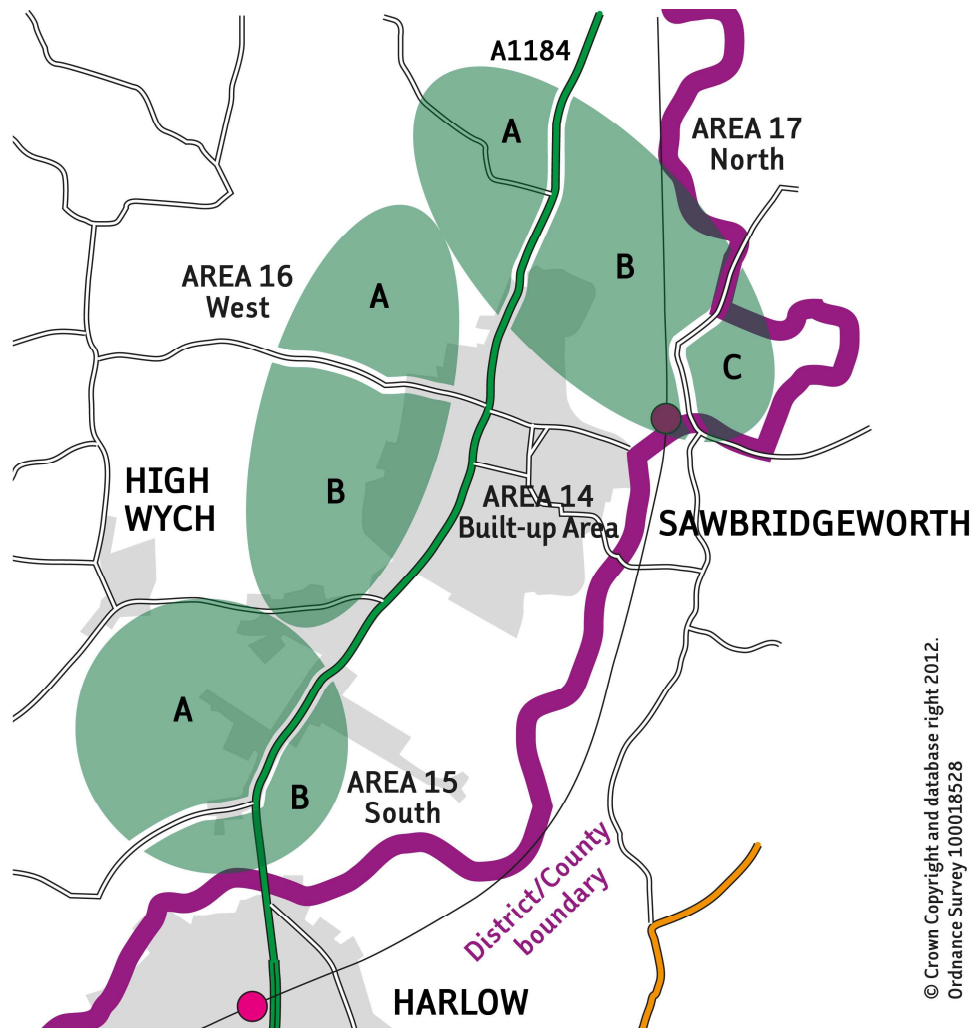
Area	Description/Sub-Areas	Dwellings
	Discounted options: areas 12A, 12B, 13A, 13B, 13D	0
10	Built-Up Area	875
11	West (A and B)	600
12	North (C)	100
13	South (C)	100
MAXIMUM TOTAL		1,675

Key points from the assessment so far (7th August 2012)

- Secondary Town Centre
- Constraints due to topography and flood plains
- Peak time congestion issues, especially on A414
- Likely prohibitive cost of new bypass
- Panshanger Country Park proposal to the west
- Strategic gap with Ware
- Lack of schools capacity

(Dates agreed at Full Council are shown in brackets)

Sawbridgeworth – initial Areas of Search (7th April 2012)



Shortlisted Options (7th August 2012)

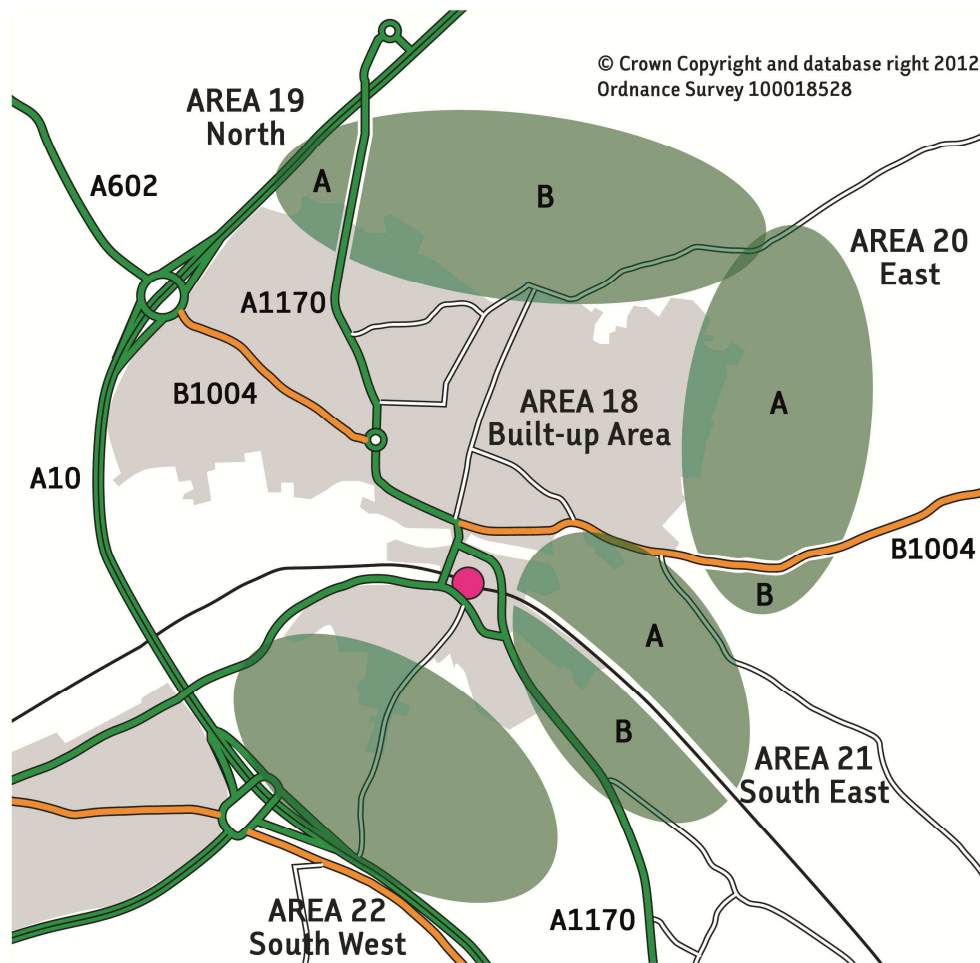
Area	Description/Sub-Areas	Dwellings
	Discounted options: areas 15, 17	0
14	Built-Up Area	111
16	West. Development options at different scales in area 16.	200 <u>or</u> 3,000
MAXIMUM TOTAL		3,111

Key points from the assessment so far (7th August 2012)

- Minor Town Centre
- Limited local employment
- Constrained to the east by Flood Zone 3
- Limited capacity on the A1184 – could require a new bypass
- Lack of schools capacity

(Dates agreed at Full Council are shown in brackets)

Ware – initial Areas of Search (7th April 2012)



Shortlisted Options (7th August 2012)

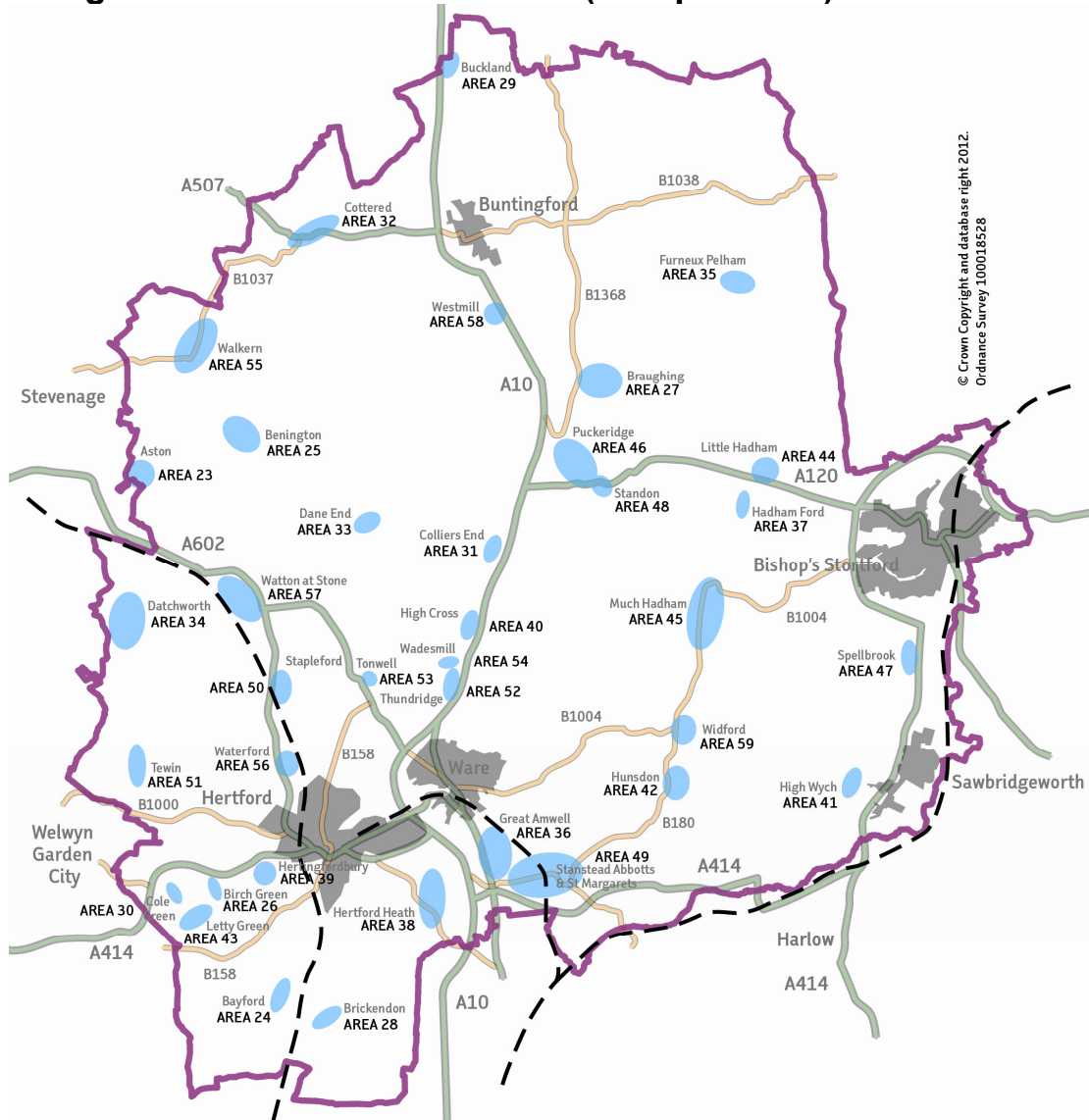
Area	Description/Sub-Areas	Dwellings
	Discounted options: areas 20B, 21A&B, 22	0
18	Built-Up Area	147
19	North (A and B). Development options at different scales in 19B.	200 <u>or</u> 1,700
20	East (A only)	1,300
	MAXIMUM TOTAL	3,147

Key points from the assessment so far (7th August 2012)

- Minor Town Centre but GSK located in the town
- A10 boundary to the west
- Strategic gap with Hertford and Hoddesdon
- Congestion issues in town centre, especially in the High Street, which are exacerbated at peak times
- Lack of schools capacity

(Dates agreed at Full Council are shown in brackets)

Villages – initial Areas of Search (7th April 2012)



Shortlisted Options (7th August 2012)

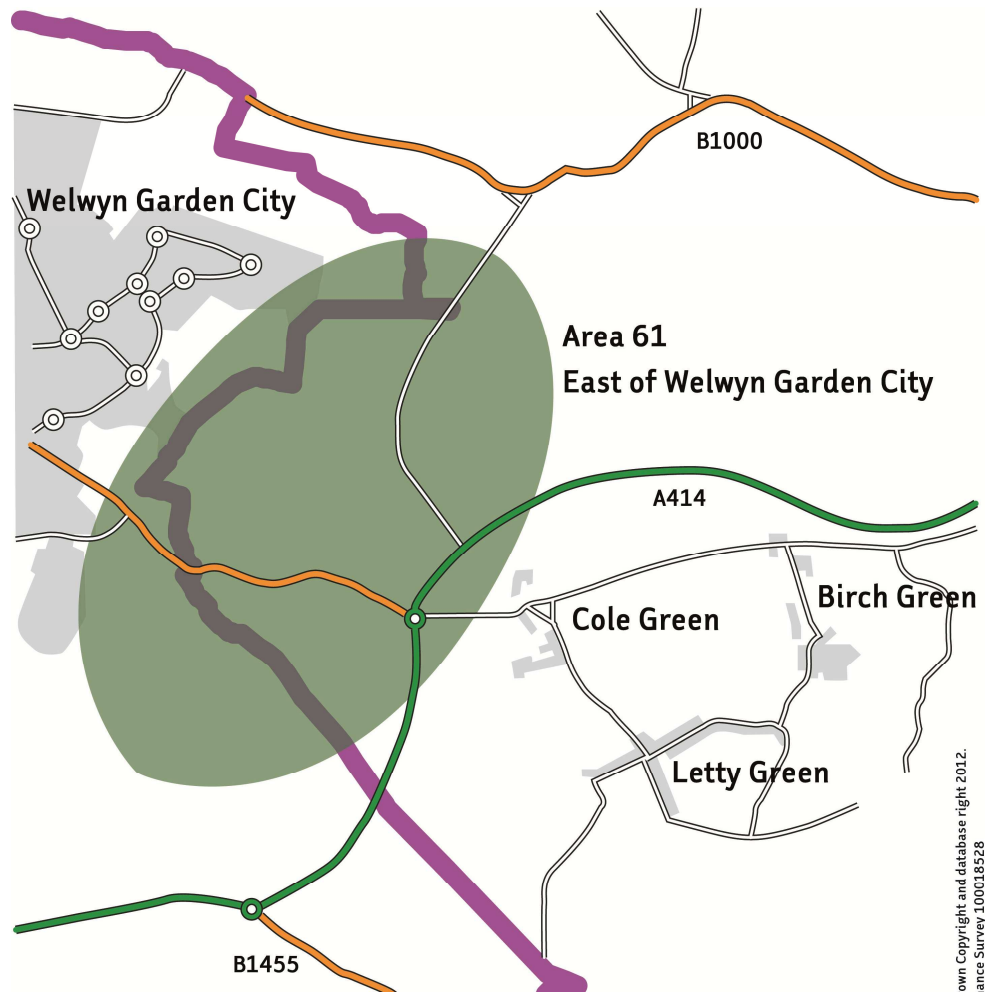
Area	Description/Sub-Areas	Dwellings
23-59	A selection of villages - TBC	10% dwellings growth from start of plan period
MAXIMUM TOTAL		500-1000 dwellings

Key points from the assessment so far (7th August 2012)

- Suitable for small-scale residential development only, probably totalling no more than 500-1000 dwellings shared between 20-30 villages

(Dates agreed at Full Council are shown in brackets)

East of Welwyn Garden City – initial Areas of Search (7th April 2012)



Shortlisted Options (7th August 2012)

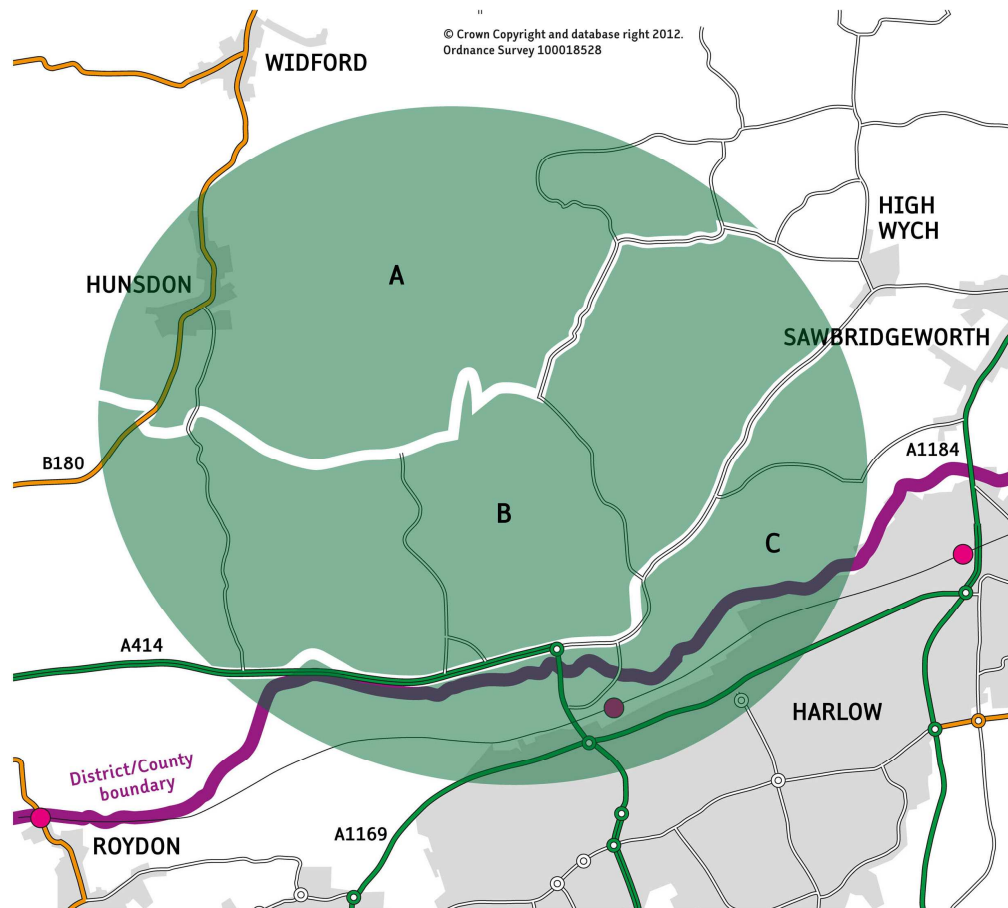
Area	Description/Sub-Areas	Dwellings
61	East of Welwyn Garden City	2,000

Key points from assessment so far (7th August 2012)

- Main Town centre and Hatfield Business Park nearby
- Proximity to A414, also provides clear boundaries
- Panshanger Country Park proposal to the east
- Would need co-operation with Welwyn Hatfield Borough
- Lack of schools capacity in Welwyn Garden City

(Dates agreed at Full Council are shown in brackets)

Harlow – initial Areas of Search (7th April 2012)



Shortlisted Options (7th August 2012)

Area	Description/Sub-Areas	Dwellings
	Discounted options: Sub-Area C (except 270 at Terlings Park)	270
62	North of Harlow – 10,000 split across 62A and 62B.	10,000
69	Hunsdon Area (same area as 62) – geographical options in Area 62A <u>or</u> 62B	5,000
MAXIMUM TOTAL		10,000

Key points from assessment so far (7th August 2012)

- Stort sensitive valley landscape to the north
- Strategic gap with Sawbridgeworth
- Harlow Council's regeneration and growth aspirations
- May require an expensive link road to a new junction 7a on the M11

(Dates agreed at Full Council are shown in brackets)

Essential Reference Paper 'C' - A Stepped Approach to Strategy Selection for the District Plan – Version 3 (November 2012)



Ch 1: Background and Approach	Ch 2: Issues	Ch 3: Assessment Criteria	Ch 4: Places		Ch 5: Options Refinement	Ch 6: Strategy	Chapter 7: Policy	Ch 8: Draft Plan
Explaining the nature of the task and the wider context	Understand the strategic planning issues	Developing 69 assessment areas and 21 topics, assessing each area against each criterion	Sieve 1: Area Assessments	Sieve 2: Settlement Evaluations	Technical work to refine the short-list from Sieve 2	Strategy formulation and NPPF compliance	Drafting realistic policies to support the strategy	Draft District Plan Part 1: Strategy
March 2012 Introduction District Plan Progress So Far Scope Planning Policy and the Planning System Localism and Neighbourhood Planning A Stepped Approach Consultation Refining the Approach Delivery Infrastructure Planning Sustainability Appraisal.	March 2012 Housing Economy Education Transport Water Telecoms, Gas and Electricity Natural and Historic Environment Green Belt Community and Leisure Natural Resources Environmental Quality	March 2012 <u>Part 1:</u> Land Availability Employment Potential Primary Schools Secondary/Middle Schools Highways Infrastructure Vehicular Access Access to Bus Services Access to Rail Services Waste Water Impacts Flood Risk Designated Wildlife Sites Historic Assets Landscape Character Green Belt Strategic Gaps Boundary Limits Community Facilities Minerals and Waste Agricultural Land Environmental Stewardship Noise Impacts <u>Part 2:</u> Application of the criteria from Part 1 to the 69 areas of search, to produce a 'Traffic Light' rating (Appendix A)	July 2012 Evaluation of 69 separate areas using the criteria established in Chapter 3, and using the traffic light assessments. Local-area consideration of revised scale assumptions against initial test assumptions.	July 2012 Consider impact of combinations of possible growth areas on existing settlements and the wider area. Evaluation of whether/how growth could fit within this wider context. Settlement-level consideration of revised scale assumptions. Based on Sieve 1 results plus Documents and Feedback (Appendix B)	November 2012 Economic Development Urban Form February 2013 Schools planning Highways (including transport modelling) Green Belt Review Delivery	February 2013 Housing Requirements Assessing alternative levels of growth and combinations of options Habitats Regulations Assessment Part 1 Strategy and Vision Housing trajectory Interim Preferred Strategy	February 2013 Policy Development Financial Viability Assessment Community Infrastructure Levy Habitats Regulations Assessment Part 2 Final Preferred Strategy	February 2013 Key Diagram Broad locations for development Strategic Policies and Allocations Village Strategy Infrastructure and delivery policies Monitoring Framework
Member Comments April 2012		Member Comments April 2012	Member Comments August 2012		Member Workshop: Process November 2012		Member Workshop: Strategic Policies January 2013	Public Consultation Ch 1-8 and Environmental Report April-June 2013

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Chapter 5

Options Refinement

Chapter 5 Options Refinement

5.1 Introduction

- 5.1.1** This chapter presents further layers of refinement and deepens assessment of the main issues as they are likely to impact on development options in different locations.
- 5.1.2** Chapter 3 used defined assessment criteria to generate red/amber/green ratings. These ratings were then used as a framework for comparative assessment of 69 defined 'areas of search'. In Chapter 4 the relative weight assigned to each topic was evaluated in relation to each specific area of search to assign one of four ratings to each area: Pass, Marginal Pass, Marginal Fail, and Fail. The same rating system was applied to the area of search in relation to the wider area, to enable consideration of strategic and cross-boundary issues. Only those areas assigned a 'Fail' rating were dropped from the strategy selection process. This process of dropping options was described as a 'sieve approach'.
- 5.1.3** In this chapter the approach combines the focus on specific issues which formed the basis for Chapter 2 with the comparative approach to specific areas of search contained in Chapters 3 and 4. This enables more in-depth assessment of key issues in relation to specific areas of search. It also means that decisions are taken only when sufficient evidence is accumulated to be able to do so with confidence.
- 5.1.4** Because the focus in this chapter is on more complex issues, it is not appropriate to apply a 'tight' assessment framework of the type used in the early stages of strategy selection when relatively simple and clear-cut criteria were employed. Instead, a 'looser' assessment framework is set out, under which the same issues are applied to each broad area, and to specific areas of search where possible.
- 5.1.5** No ratings have been applied to the separate assessment in this chapter because many of the issues are nuanced and therefore do not readily lend themselves to such assessment. Instead, the conclusion to this chapter will draw together the headline findings to evaluate the main significant differences between the areas of search.
- 5.1.6** A number of topics have been selected as critical areas for further assessment because a) there are identified gaps in the evidence base relating to NPPF requirements b) further information proportionate to the requirements of strategic plan-making is available or can be readily obtained c) the information can be meaningfully applied to the task of differentiation between options.
- 5.1.7** In accordance with these principles, the topics addressed in this chapter are as follows :

- **Economic development:** independent expert view of realistic economic development options, taking account of viability, future market trends, and economic geographies beyond the individual area or settlement;
- **Urban form:** high-level assessment of landscape and setting, structure and connectivity, function and capacity, and open space and green infrastructure, based on site visits, map-based observation, and relevant documents;
- **Schools:** realistic options to accommodate additional pupils generated by new residential development;
- **Highways:** transport modelling to assess the likely impacts of development and the feasibility of policy interventions to provide new infrastructure or sustainable transport measures;
- **Habitats Regulations Assessment:** legal requirement in relation to designated sites in the Lea Valley, Broxbourne Woods, and Epping Forest;
- **Green Belt Review:** comparative assessment of areas of East Herts Green Belt, including strategic assessment in relation to the five purposes defined in national policy, and detailed assessment in relation to the options for possible new Green Belt boundaries;
- **Delivery:** checking whether land is available for development and what the main land use requirements could be (e.g. residential, commercial, leisure, education, other)

5.1.8 Each of these assessments refine the existing assessments provided in the previous chapters. Whilst each section in this chapter has been written as a stand-alone assessment, each relates to the broad reviews of the key issues undertaken in Chapter 2 as shown in Table 5.1 below:

Table 5.1 Refining the issues and the options

This Chapter	Previous sections
Economic Development	Economy (2.3); Employment Potential (3.3)
Urban Form	Natural and Historic Environment (2.8); Landscape Character (3.14)
Schools	Education (2.4); Primary Schools (3.4); Secondary Schools (3.5)
Highways	Transport (2.5); Highways Infrastructure (3.6)
Habitats Regulations Assessment	Natural and Historic Environment (2.8); Designated Wildlife Sites (3.12)
Green Belt Review	Green Belt (2.9); Boundary Limits (3.16); Strategic Gaps (3.17)

This Chapter	Previous sections
Delivery	Delivery (1.10); Infrastructure Planning (1.11)

5.1.9 There are also a number of other critical issues addressed previously, for example in relation to water supply and the impact on the environment, which will be addressed further in the remaining chapters of this document.

5.2 Economic Development

5.2.1 Economic development encompasses a wide range of activities in a range of different types of premises, in a variety of different locations from town centres to out-of-town centres and at home. A realistic strategy for the District Plan will need to take account not just of local settlements but of future trends and economic geographies crossing district boundaries. National policy sets out the main requirements in terms of the high-level requirements for plan preparation as follows:

National Planning Policy Framework

Paragraph 160: Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:

- work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.

5.2.2 In order to further the Council's understanding of businesses and markets for the plan period, to provide a basis for future engagement with the business community and the Local Enterprise Partnership (LEP), and to facilitate a robust development strategy to underpin the District Plan, East Herts Council commissioned economic advice from consultants DTZ. ⁽¹⁾ The consultants' report identifies a number of future economic trends, including the focus on towns and cities, clustering, the changing face of retailing and distribution, and self employment and homeworking. Taking account of NPPF requirements and the strategic advice contained within the DTZ report, four key assessment perspectives have been identified for the purposes of development strategy formulation:

- **Opportunities for jobs growth in the locality:** planning should actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or could be made sustainable, and maintaining the vitality of urban areas (NPPF Paragraph 17). This assessment therefore looks at the feasibility of new jobs at each of the remaining areas of search, whether in a new employment allocation, in another non-allocated location such as a neighbourhood centre, or other local services. Some areas of search are better placed than others to attract businesses, and this partly reflects ease of access to the motorway network, and space to provide modern facilities.⁽²⁾
- **Opportunities for jobs growth in the wider travel to work area:** the NPPF requires that in planning strategically across local authority boundaries account should be taken of wider travel-to-work areas (NPPF paragraph 180). The DTZ report examines the 'sub-regional distribution of employment growth' in and beyond East Herts.⁽³⁾ There are a number of major employment centres such as Hatfield Business Park, Gunnels Wood, Stevenage, Knebworth Innovation Park, Stevenage, Stansted Airport, Harlow Enterprise Zone, and Park Plaza, Waltham Cross, which are likely to see significant growth. In addition, the City of London, outer London, and a number of other areas beyond the district boundaries are likely to continue to provide significant employment for current and future residents of the settlements of East Herts. The realities of these wider economic geographies in relation to the specialised, flexible, and mobile modern labour and housing markets means that it is often unrealistic to expect people to live and work within the same settlement.
- **Investment barriers:** the NPPF states that local planning authorities should recognise and seek to address potential barriers to investment, such as poor environment or lack of infrastructure, services or housing (NPPF Paragraph 21). The assessment here seeks to identify any such barriers in the locality and the wider area, and suggest whether and how such barriers might be overcome.
- **Prospects for additional employment provision:** the NPPF requires that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose (NPPF paragraph 22). Whether or not there are reasonable prospects of take-up of particular employment sites by employers is essentially a matter of market

2 This has already been addressed briefly in the Employment Potential Topic Assessment (see Chapter 3). In practice, where businesses choose to locate will depend on the availability of facilities which match their own particular needs. The needs of Small and Medium sized Enterprises (SMEs) differ from the needs of large businesses, and the needs of different sectors also vary. Given such variety, the main concern here is to avoid a prescriptive and inflexible approach by using broad criteria.

3 See Chapter 4 of the DTZ study.

demand, and equally applies to new employment allocations as to existing allocations. DTZ's report has been used as a high-level guide to consider the market attractiveness of particular areas of search for different employment uses. In addition, consideration is given to the prospects for employment growth at non-allocated locations. The viability implications of planning policy costs is a separate matter to be addressed in the next chapter.

- 5.2.3** Taking these criteria together, it is clear that formulation of a credible and deliverable employment strategy involves working with, rather than against, the grain of the overall patterns of economic development and future trends. Therefore aspirations for local job creation have to be located within a wider understanding of the realistic prospects for sustainable economic development, given the constraints arising from competitive economic geographies, financial viability, and barriers to investment. In other words, plans must be aspirational but realistic (NPPF paragraph 154).
- 5.2.4** For economic development to be sustainable in the long-term, it must also be seen within the context of an overall understanding of successful place-making. To take one example, a positive link between residential development and the vitality of existing town centres has been identified in the strategic advice prepared by the consultants. In terms of economic well-being, this consideration must be balanced against maintaining quality of life to attract skilled residents, and also about ensuring that traffic congestion does not unduly reduce the attractiveness of the district as a place to live and to do business. This latter point will be addressed in the section on highways later in this chapter.
- 5.2.5** Finally, the report prepared by DTZ shows that in assessing the competitive impacts of new employment options on existing employment, it is first necessary to understand the nature of economic geographies, industrial sectors and what is being proposed. Adverse impacts tend to occur when there is direct competition with different locations in close proximity fulfilling the same functions. However, where new proposals are different they may complement and reinforce the economic vitality of an area by adding to the overall economic activity. The economy of East Herts is dominated by Small and Medium-sized Enterprises (SMEs) and development of premises for larger businesses outside the district would not tend to compete directly with the district's existing economic base.

Bishop's Stortford

- 5.2.6** The town is well related to Stansted Airport and transport links, with a thriving town centre including substantial comparison goods offer. There are opportunities for development at the Goods Yard and the Causeway, and possibly also the Mill Site in the longer term. There are a number of well regarded employment areas within the town.

5.2.7 The recently prepared Jobs Forecasting and Strategic Economic Development Advice from DTZ consultants concludes that the location with the strongest prospects for employment growth in the District is Bishop's Stortford, because of its location on the M11; its proximity to Stansted Airport which is expected to generate additional jobs in future years; and the character of the town. To realise this potential for growth, DTZ anticipates the need for allocation of new employment land particularly for B1 uses, at a location on the A120 on the northern or western side of the town, ideally as close as practicable to Junction 8 on the M11. There is also scope for employment growth in the town centre. It would be consistent with planning policy to plan for significant residential growth to accompany employment growth. In terms of future economic development, the following observations may be made:

Area of Search 1: Bishop's Stortford Built-up Area - 1,233 dwellings:

5.2.8 Local-area opportunities: Depending upon where development occurs within the existing built-up area, there may be local opportunities to create small-scale economic/employment developments. Existing employment locations, although well-occupied, are not considered flexible and suffer from constraints such as a lack of parking and relatively poor access to main transport networks. The Goods Yard Development Brief (2011) includes aspirations for a mix of uses including office and retail, and possibly a hotel. Proposals to create a town centre boundary linking the station with the existing town centre could provide a significant opportunity. The town centre development scheme at Old River Lane, (approved subject to the completion of a Section 106 Agreement) is possibly the biggest opportunity for new jobs in the retail and service sectors.

5.2.9 Wider-area opportunities: In terms of the town as a whole, this level of development may assist in maintaining the viability of the town centre, and existing employment sites and businesses. The potential advantages gained from new employment development would depend on the type of new business created. Some businesses may prefer a town centre location with good access to shops, services and rail connections, whereas a light industrial or warehouse based business would prefer to be located close to main access routes, and may therefore have little connection with existing town centres or employment land. A business park on the edge of the built-up area would meet the needs of businesses and would be preferred compared to a town centre location because of the time penalty involved in travelling into the centre of Bishop's Stortford and the cost of parking.

5.2.10 Bishop's Stortford gains considerably from its proximity to Stansted Airport and benefits from its own junction on the M11. Functionally, Bishop's Stortford operates within a travel to work area that spans the M11 corridor and includes not only the airport but also Harlow, Sawbridgeworth and the nearest Uttlesford towns. Out-commuting is a dominant aspect of residents in the town and there are a high number of Bishop's Stortford residents

that have airport-related jobs (25% of airport employees reside in Bishop's Stortford). Much of the recent growth of the town has been as a result of airport expansion. Proposals for the release of a 18 hectare employment site at Stansted Airport for non airport-related employment uses is a key opportunity for businesses who would benefit from being close to the airport, the M11 and to Bishop's Stortford services and the town's potential labour supply, but are not constrained by a need to be located close to the M25. Indications suggest that this opportunity would complement the existing employment land within Bishop's Stortford. Conversely, Bishop's Stortford could benefit from office based users who want proximity to the airport, but do not want to be at the airport itself.

5.2.11 Investment barriers: Existing employment sites would need considerable investment to ensure they are fit for purpose for modern and changing business needs. Given that many of the issues faced by existing employment sites relate to a lack of access and being physically constrained, it is unlikely that these issues could be overcome even with new hard infrastructure. Investment would need to be focused on improving the existing buildings to ensure they are flexible and are suitable for modern technological requirements. New employment sites located close to major road networks would need to be allocated along with the necessary infrastructure.

5.2.12 Prospects for employment: New employment development located within the existing built-up area is likely to be viable in financial terms if they consist of the redevelopment of existing employment areas. However, if the choice was available, investors may prefer to invest in a new less constrained location rather than redevelop existing constrained sites. There may be prospects for limited small-scale office development at the Goods Yard, although the overall attractiveness of this location is limited compared with a new employment area on the edge of town, which could provide better access and parking.

Area of Search 2: Bishop's Stortford North - Sub Area A: 700 dwellings

5.2.13 Local-area opportunities: The Strategic Economic Development Advice suggests that part of this area could be suitable for an employment allocation, given its good access to the A120 and M11. The developer consortium has suggested on its website that it is considering the provision of a Business Incubator Centre, possibly run by the Chamber of Commerce, although it is unclear whether this might be in sub-areas A or B at this stage. It may be that a Business Incubation Centre could form part of an employment allocation.

5.2.14 Wider-area opportunities: indications are that Bishop's Stortford is the best location in the District for a new employment allocation. Given constraints at other sites on the A120 nearer the M11, Sub-Area A is likely to provide the best opportunity in the town for a relatively small but modern

employment area. This would complement existing employment areas in the town and take advantage of the proximity to the M11 and Stansted Airport.

5.2.15 Investment barriers: Further assessment of the capacity of the A120 to handle the increased traffic arising from development to the north of the town will be needed.

5.2.16 Prospects for employment: the developer consortium has not proposed to proceed with the concept of an employment location, although the delivery of an employment allocation as part of the wider development of Sub-Areas A and B is likely to mean that any financial risks can be offset by the delivery of housing development.

Area of Search 2: Bishop's Stortford North - Sub Area B: 1,400 dwellings

5.2.17 Local-area opportunities: the Roger Evans Masterplanning Study (2005) suggested that employment allocations would be best suited to sub-areas A or C, (at the eastern and/or western ends of Area 2) for access and visibility reasons and also to enable a coherent residential neighbourhood structure to be delivered in Sub-Area B. Therefore it is not considered that Sub-Area B in the middle of Area 2 is suitable for an employment allocation or for larger-scale retail. However, it is likely that this sub-area would contain a neighbourhood centre with local shops and other local services and facilities and would therefore be likely to generate some local service employment.

5.2.18 Wider-area opportunities: Sub-Area A to the west presents a more suitable location for an employment allocation given the proximity to the A120/Hadham Road roundabout and better visibility.

5.2.19 Investment barriers: the main barrier to investment in this area is lack of direct access to the A120. Without direct access this area would be unattractive to prospective employers. However, the A120 is a primary route and therefore an exception would have to be made to the standard policy discouraging direct access on the basis of transport modelling evidence.

5.2.20 Prospects for employment: It is likely that one or more neighbourhood centres would be required including local shops and other services and facilities, and such a centre could form part of this. Therefore the prospects for this kind of scheme are considered good.

Area of Search 2: Bishop's Stortford North - Sub Area C: 400 dwellings

- 5.2.21 Local-area opportunities:** this area is well located in relation to access to the motorway, and the Strategic Economic Development Advice suggested that this area would rank highly in terms of access to the motorway network. The Employment Potential topic assessment (Chapter 3) suggested that the area scores well for visibility and access.
- 5.2.22 Wider-area opportunities:** the developer has promoted options for an employment allocation across the road at the Stansted Road roundabout within the A120. This area has the advantage of being located in close proximity to the motorway and with good access to the A120. However, the site lies within Uttlesford District, and Uttlesford Council has publicly stated its intention not to permit development in this area, and this is reflected in its Draft Local Plan (2012).
- 5.2.23 Investment barriers:** there is no direct access to the A120. Access would need to be via Michael's Road to the Stansted Road roundabout.
- 5.2.24 Prospects for employment:** given that the land is not part of the consortium for Bishop's Stortford North, the financial risks of an employment allocation cannot be easily offset with residential provision. Perhaps because of this, the landowner/developers have publicly stated that they are proposing a residential scheme. Given these factors, there do not appear to be reasonable prospects for significant employment provision in this location.

Area of Search 3: Bishop's Stortford East - Sub-Area A: employment land only

- 5.2.25** This area of search failed the previous sieving process for residential purposes as the site is more suited for employment uses. It is therefore deemed appropriate to re-address this area of search in this Sieve for employment uses only.
- 5.2.26 Local-area opportunities:** This area of search is well suited for employment land being adjacent to Junction 8 of the M11. The Strategic Economic Development Advice provided indicates this location as a preferential location in terms of market perspective and would attract the most occupier demand for B1 uses. The site is adjacent to Woodside Industrial Estate and Birchanger Services and is reasonably close to existing employment land within the town at Raynham Road and Dunmow Road.
- 5.2.27 Wider-area opportunities:** Given its proximity to the M11 and Stansted Airport, this site is ideally located to serve businesses who want to be close to the airport but want an off-airport site closer to potential labour sources and other businesses. There are potential opportunities that may arise from the sale of Stansted Airport as a new owner may have new ambitious plans for the airport which may increase business and residential needs in Bishop's Stortford. Uttlesford District Council are proposing the release

of an 18 hectare employment site located on the airport for non-airport related uses. In terms of the potential impact this would have on new employment land in Bishop's Stortford and this area of search in particular, it is considered that the Uttlesford site would be more likely to appeal to warehouse operators and B1c Light Industrial occupiers than B1a Office occupiers or B1b R&D occupiers. It is not considered that there would be any conflict with employment opportunities in Harlow given the relative distance from the M25.

- 5.2.28 Investment barriers:** The greatest implications in terms of infrastructure constraints revolve around the need to relocate the current occupier of the land - Bishop's Stortford Football Club. It is known that the club wish to expand and their member numbers are so great that they place considerable demand on all the available football pitches in and around the town. Whilst they might be willing to relocate, any new ground would need to be somewhat larger than their current site, providing second and training pitches along with mini and junior pitches. There are no sites available of this size within the town and the number of landowners, issues of land assembly and the many funding uncertainties involved may make this employment land option undeliverable until the latter stages of the plan period.
- 5.2.29 Prospects for employment:** As noted above, the location in general would be very attractive to business occupiers but the need to facilitate the relocation of Bishop's Stortford Football Club may make this option financially unviable.

Area of Search 3: Bishop's Stortford East - Sub-Area B only: 150 dwellings

- 5.2.30 Local-area opportunities:** This area of search is well suited for employment land being adjacent to Junction 8 of the M11. The Strategic Economic Development Advice provided indicates this location as a preferential location in terms of market perspective and would attract the most occupier demand for B1 uses. The site is opposite Woodside Industrial Estate and is adjacent to Birchanger Services and is reasonably close to existing employment land within the town at Raynham Road and Dunmow Road. However, the land in question is currently occupied by Bishop's Stortford Golf club who have no desire to relocate nor close and as such, only a small part of the area of search is available for development and this land does not have direct access to Dunmow Road.
- 5.2.31** In terms of residential development, this area of search would yield approximately 150 dwellings. However, it is considered unlikely that this level of development would create any new employment enterprises on its own in the local area; although the increase in population could help support the town's existing economic base.

- 5.2.32 Wider-area opportunities:** Given its proximity to the M11 and Stansted Airport, this site is ideally located to serve businesses which want to be close to the airport but want an off-airport site closer to potential labour sources and other businesses. There are potential opportunities that may arise from the sale of Stansted Airport as a new owner may have new ambitious plans for the airport which may increase business and residential needs in Bishop's Stortford. Uttlesford District Council are proposing the release of an 18 hectare employment site located on the airport for non-airport related uses. In terms of the potential impact this would have on new employment land in Bishop's Stortford and this area of search in particular, it is considered that the Uttlesford site would be more likely to appeal to warehouse operators and B1c Light Industrial occupiers than B1a Office occupiers or B1b R&D occupiers. It is not considered that there would be any conflict with employment opportunities in Harlow given the relative distance from the M25.
- 5.2.33 Investment barriers:** At this point in time there is no indication of a desire to relocate or close Bishop's Stortford Golf Club, and the information received from the Golf Club suggests a preference for residential development only. If the submitted land was considered further, agreement to release land sufficient for an access road from Dunmow Road and to consider the alternative use of land for employment purposes would be required to make the land suitable for employment uses.
- 5.2.34 Prospects for employment:** As noted above, the location in general would be very attractive to business occupiers but the need to negotiate the release of the required land from Bishop's Stortford Golf Club may affect the viability of the option.

Area of Search 4: Bishop's Stortford South - Sub-Area A: 800 dwellings

- 5.2.35 Local-area opportunities:** This is a large site to the south of the town with good access to the A1184 towards Sawbridgeworth and Harlow, and to the south-western distributor road (St. James' Way). However, the area is less well-located in terms of the town centre of Bishop's Stortford and in terms of quick and easy access to the M11. Despite this, given its size and location the site would still have reasonable prospects for employment uses.
- 5.2.36** The Area of Search was subject to a planning application for education facilities which was refused among other reasons for being within the Green Belt. At this stage it is necessary to still consider the option of using this land for a secondary school. If the land was developed only for residential uses there would be a need for a local shopping parade and the provision of additional education facilities elsewhere in the town, which may provide some employment opportunities. 800 dwellings would create a need for

employment opportunities of a demand that the town cannot currently provide. Therefore, it would be necessary to provide for additional employment land within or in proximity to Bishop's Stortford.

- 5.2.37 Wider-area opportunities:** Given it's relatively poorer access compared to areas in the north and north-east of the town, businesses locating here are more likely to be of a smaller scale, have local connections and not be dependant upon access to the M11 and Stansted Airport. The Strategic Economic Development Advice provided suggests that "this location would not attract significant employers looking for space in the sub-region, simply because of the time and distance needing to be travelled to access the M11 either through the town centre or via the ring-road. This is therefore not a strategic location and the decision whether to bring forward land at this location can be taken on the basis of assessed local requirements, since the site would only cater for local businesses".
- 5.2.38 Investment barriers:** There would be no significant infrastructure barriers to locating employment land in this area of search. Access would be best located near the A1184/St James' Way junction and would in theory be possible to achieve. There are a number of bus routes in the area which could link the area of search with the town centre and the rail station. Development would need to be located and designed in a manner that avoids any physical impact on the Hertfordshire Way in the northern part of the area of search.
- 5.2.39 Prospects for employment:** Given that this area of search is unlikely to be attractive to large or significant employers it may be that without intervention, smaller businesses would not be viable in this location. Employment development would therefore need to be provided as part of a mixed-use scheme.

Key Points: Economic Development Opportunities in Bishop's Stortford

- 5.2.40** Bishop's Stortford has the greatest potential of any of the settlements in East Herts District for economic development, given its proximity to the M11 and Stansted Airport in particular.
- 5.2.41** There is likely to be demand for a new employment allocation on a greenfield site to the edge of the town, particularly on the A120 between the Hadham Road roundabout and Junction 8 of the M11. The prospects for delivery of such an allocation are best at the A120/Hadham Road roundabout, because of various constraints at other possible sites nearer the M11. Such an allocation would be likely to complement existing employment allocations in the town because it would provide a different and new offer.

- 5.2.42** The Goods Yard site may be capable of a small amount of office development, although it may not be financially viable for a significant amount of office development to come forward in this location.

Buntingford

- 5.2.43** Buntingford is a small market town in the north of the District on the A10. It is some distance from major employment centres, with Bishop's Stortford some 12 miles to the east, Baldock and Letchworth 12 miles to the north west, Royston 6 miles to the north, Stevenage 6 miles to the west and Ware 10 miles to the south. Buntingford does not have a rail service and therefore residents are likely to drive to one of the neighbouring towns to access the railway service. The town has a comparatively older population than the other main towns in the District. While this may reduce the proportion of adults of working age, the unemployment rate for those of working age is relatively low. It may be due to the inaccessibility of the town that it is populated by those who do not have to travel to work, or by those who can afford to travel by car some distance for employment. It is also possible that a relatively large proportion of those in work do so from home, since this is an increasingly common characteristic for those living in rural areas provided there is access to good standard broadband services. In terms of future economic development, the following observations may be made:

Area of Search 5: Buntingford Built-up Area: 67 dwellings

- 5.2.44** **Local-area opportunities:** Buntingford itself is not well located for the majority of business types that rely on access to major transport networks such as motorways or rail connections. However, for businesses that serve, or are linked to a small centre, the town's high quality environment is an attraction. The recent interest in the former Sainsbury's distribution depot in the south of the town has rejuvenated employment interest in the town, with a possible redeveloped distribution centre, which could create 600 new jobs. However, given the relatively older population of the town and its low level of unemployment, it is unknown at this stage whether these jobs would actually serve the town, or would draw labour from nearby towns such as Stevenage.
- 5.2.45** There are several small employment sites around and near to the town from which new employment opportunities could be built. However, these existing sites may not be suitable for modern or changing business needs.
- 5.2.46** **Wider-area opportunities:** The main advantage Buntingford has in terms of its location is that it serves a relatively large rural hinterland. As such, a new employment location such as a redeveloped distribution depot would not only serve this hinterland, but could also draw its employees from the same wide geographic area. As previously discussed however, the town is not well located for businesses that rely on motorway or rail connections.

Buntingford is not a strategic employment location and will not attract large scale employers, since they would not be able to easily recruit locally. But it could attract smaller, essentially local employers either with strong local connections or those who regard it as a good central location to service customers in the ring of towns all located within 10 to 15 miles around Buntingford. Business rates and rents are comparatively cheaper than neighbouring major employment centres which could be another attraction for businesses.

5.2.47 Investment barriers: The greatest barrier preventing large scale employment development is the lack of access to motorway and rail services. Even with the remote possibility of a new railway line beyond the current planning period, the distance from other major employment centres is the biggest disadvantage facing the town. Small-scale employment development would be able to fit into the existing infrastructure available in the town without the need to invest in new infrastructure.

5.2.48 Prospects for employment: Large-scale employers would not be attracted to the town, not only due to its distance from other major centres and major road networks, but also due to the lack of local labour. Small-scale employers with local links would be more likely to locate in the town as it is a good location to serve the hinterland around the town. However, small-scale employers are not likely to be able to afford the costs associated with developing an industrial estate or business park so financial intervention would be needed to provide a range of small, flexible units on an attractive site, probably as part of a wider mixed-use scheme.

Area of Search 6: Buntingford South and West - Sub-Area A: – employment land only

5.2.49 This area of search failed the previous sieving process for residential purposes as the site is more suited for employment uses. It is therefore deemed appropriate to re-address this area of search in this Sieve for employment uses only.

5.2.50 Local-area opportunities: The existing Buntingford Business Park is a well-located employment site with relatively modern premises and a site that is suitable for expansion. Located on the junction of the A507 and the A10 bypass, the site is better located in terms of access to major road networks compared to the other areas of search and employment sites in and around the town. In terms of impact, the existing business park is well screened from the road by bunds and vegetation and any expansion could occur to the north of the existing buildings if necessary. There are also several small employment sites around and near to the town from which new employment opportunities could be built. However, these existing sites may not be suitable for modern or changing business needs.

- 5.2.51 Wider-area opportunities:** A disadvantage of this site is that it is not as well-connected to the town centre (15-20 minute walk), lacks regular bus services past the area and the crossing point across the A10 would need safety improvements. These issues may however be overcome with investment. In terms of connections with existing employment areas in the town, this area of search is almost centrally located on the A10 bypass between the former Sainsbury's Distribution Depot in the south of the town and Park Farm Industrial Estate in the north of the town. In terms of serving the wider hinterland around Buntingford, being located on the A507 immediately adjacent to the A10 bypass means the site has good accessibility to the major road network around the town.
- 5.2.52 Investment barriers:** The existing employment land at Buntingford Business Park already has adequate infrastructure that could be expanded comparatively easily. One matter that may need further consideration depending upon the location of any new units on the site is that of ensuring continued access to the covered reservoir that lies to the west of the business park. New bus connections and road crossings would also help ensure that the site could be accessed by sustainable transport means.
- 5.2.53 Prospects for employment:** To extend Buntingford Business Park would be more cost-effective than creating a new site on another location as there are already utilities on site and a suitable access to the A507. It is one of the best located employment sites in Buntingford and would therefore be attractive to local businesses. In terms of considering the risk of speculative development, to expand an existing business park would be considered less of a risk than creating a new site in an untested location.

Area of Search 6: Buntingford South and West - Sub-Area B: 500 dwellings

- 5.2.54 Local-area opportunities:** Even though the proposed redevelopment of the former Sainsbury's Distribution Depot would, if approved, provide for some of the employment need associated with potential residential development in the town, one could not assume that all new residents would wish to work at the depot. This area of search, although adjacent to the A10 bypass would need to secure access from Baldock Road in order to make it suitable for employment uses. As the northern part of this area of search is in close proximity to an existing employment area at Buntingford Business Park there would be little to justify the creation of new employment land alongside residential properties when it would be more suitable, easier to achieve and more cost-effective to expand the Business Park.
- 5.2.55** Whilst there is an existing employment site at Watermill Industrial Estate in the southern part of this area of search, along with the unneighbourly use of land as a sewage plant which makes this area of search more suitable for employment uses than residential, the location and poor access makes it a less attractive site for business occupiers. Access is currently

gained via Aspenden Road, a narrow lane past residential properties accessed of London Road/Station Road rather than via a direct link from a main road. The site is less-well laid out with generally small, poor quality units and as such, the site scores poorly in terms of marketability. Refurbishment of the existing site may increase employment potential, but the site is constrained preventing expansion and as the site is within Flood Zone 2, there may be implications in terms of flood risk and suitable uses. There are also several existing employment sites around and near to the town from which new employment opportunities could be built, most of which are more suitable for modern or changing business needs.

5.2.56 Wider-area opportunities: The southern part of this area of search is not very well connected to the town centre or to other employment sites around the town. There is no alternative means of transport though there may be opportunities to improve this situation if any employment land was considered alongside a wider residential-led development. In terms of serving the wider hinterland around Buntingford, the southern part of this area of search has better access to villages to the south of the town than to the wider hinterland.

5.2.57 Investment barriers: If employment land was sought in the northern part of the area of search new access roads and junctions would be required to make the area more accessible to the A10/A507 junction. If employment land was sought in the southern part of the area of search in connection with the existing Watermill Industrial Estate, considerable investment would be needed to make the area more suitable for employment uses. Aspenden Road is relatively narrow and unsuitable for large articulated vehicles and there is no bus route serving this area. There may also be a need to install flood mitigation measures.

5.2.58 Prospects for employment: Given the poor access and other physical constraints, this location would not prove attractive to occupiers as even with significant investment the area of search would not be considered a favourable location given the alternative opportunities around the town. It is unlikely that a new junction would be acceptable from the A10. Even if this was acceptable the cost associated with such development may make the entire area of search unviable even with a mixed use, residential-led scheme. Instead, negotiations would be necessary between a number of landowners and the highway authority to gain access from Baldock Road, which would be a more cost-effective alternative.

Area of Search 6: Buntingford South and West - Sub-Area C within the bypass: 120 dwellings

5.2.59 Local-area opportunities: This area of search is effectively divided into two separate areas: land of Aspenden Road, west of the abandoned railway line; and land off London Road, east of the railway line which currently contains a football pitch used by Buntingford Cougars Youth Football Club

associated with Buntingford Football Club located on the east of the A10. Given the lack of access already cited from Aspenden Road, the western half of this area of search would be unsuitable for employment land (see Area of Search 6: Sub-Area B above). If access could be gained from London Road, the eastern half of the area of search would be well located for employment land, being located opposite to the former Buntingford Distribution Depot which is subject to a redevelopment proposal as a distribution centre. Being located at the junction of London Road with the A10, this eastern part of the area of search would be well located in terms of access to the major road network around Buntingford. There are also several existing employment sites around and near to the town from which new employment opportunities could be built.

- 5.2.60 Wider-area opportunities:** In terms of connections with existing employment areas in the town this area of search is best located to take advantage of its proximity to the potential redevelopment of the distribution depot. The area is also well located in terms of access to the A10 provided development gained access from London Road. As has already been discussed, it is unlikely that large employers would locate in Buntingford given its distance from motorway and rail connections. However, there is potential to provide local employment opportunities from businesses seeking to serve Buntingford's wide rural hinterland.
- 5.2.61 Investment barriers:** If access could be gained from London Road there would be few infrastructure issues provided development occurs in the eastern half of the area of search. The western part of the area is within Flood Zone 2 and therefore may require flood mitigation measures which may make a scheme nonviable. There is also the matter of needing to relocate Buntingford Cougars Football Club to an alternative site. It might be possible to relocate the football pitch to the western half of the site to assist in forming a green wedge in the area of flood risk less suitable for built development, provided a suitable pitch surface could be achieved. This would need negotiations with the football club as it would move the youth ground further away from the Buntingford Football Club with which they are associated.
- 5.2.62 Prospects for employment:** Depending upon where development occurred within this area of search there would be different financial implications to consider including new access points, the possible relocation of the football club and possible flood mitigation measures. Given the existing employment opportunities around the town that could be more easily expanded it may be that employment land in this area of search would not be as attractive as other alternative locations and this therefore may affect viability.

Area of Search 7: Buntingford North - Sub-Area A: 500 dwellings

- 5.2.63 Local-area opportunities:** The existing employment site at Park Farm Industrial Estate located within this sub-area is ideally suitable for expansion/redevelopment to create new local employment opportunities. As the town grows over the plan period there is likely to be increased demand for new employment and/or commercial premises to serve existing and future residents. In many ways the Park Farm Industrial Estate would represent an ideal location for retail premises to support and compliment the existing high street retail offer and to assist in retaining local expenditure as there are less physical constraints to the north of the town than to the south. Whilst employment uses are usually better located at major road junctions, the Park Farm Industrial Estate is instead well located for smaller scale businesses that serve the locality rather than those reliant on quick and direct access to the main road network. Reconfiguration of the employment premises could be sought in order to provide flexibility for the neighbouring Freman College, whilst maintaining a frontage to the employment site along Ermine Street may improve visibility of the site. Another option would be the relocation of the employment land to the north of this Area of Search closer to the junction with the A10, releasing the land at the Park Farm Industrial Estate for residential properties and again providing flexibility for Freman College to expand.
- 5.2.64 Wider-area opportunities:** This Area of Search is better located in terms of access to the high street and to towns and villages north of Buntingford. Employment development within this northern Area of Search would compliment the town's existing employment opportunities. Whilst being better located to the high street, it is not in a location that provides quick and easy access to major road networks and other employment sites around the town such as at Buntingford Business Park and the former Sainsbury's Distribution Depot and is therefore more suited to employers seeking to serve the local area rather than the wider area.
- 5.2.65 Investment barriers:** The greatest barrier preventing large scale employment development is the lack of access to motorway and rail services. Even with the remote possibility of a new railway line beyond the current planning period, the distance from other major employment centres is the biggest disadvantage facing the town. An access point directly off the A10 bypass would make employment land in this sub-area more attractive.
- 5.2.66 Prospects for employment:** If Park Farm Industrial Estate was relocated further north rather than being redeveloped this may have implications on viability in terms of having to provide an alternative employment location as part of any development. The existing Park Farm Industrial Estate is well occupied and as such is an indication of continuing demand for local employment opportunities.

- 5.2.67 Local-area opportunities:** This location would be comparatively unsuitable for employment land development given its lack of access to major road connections. Whilst businesses here would be well-located in terms of access to the town centre, it is not well-located in terms of access to existing employment areas around the town.
- 5.2.68** There are several small employment sites around and near to the town from which new employment opportunities could be built. However, the existing sites may not be suitable for modern or changing business needs.
- 5.2.69 Wider-area opportunities:** Whilst being better located to the high street, it is not in a location that provides quick and easy access to major road networks and other employment sites around the town such as at Buntingford Business Park and the former Sainsbury's Distribution Depot.
- 5.2.70 Investment barriers:** The greatest barrier preventing large scale employment development in this area of search is the lack of access to motorway and rail services. Even with the remote possibility of a new railway line beyond the current planning period, the distance from other major employment centres is the biggest disadvantage facing the town.
- 5.2.71 Prospects for employment:** This area of search does not have enough attractions for businesses or large employers given its relative lack of access, that investors are unlikely to justify the expense of creating new employment land in this location compared to investing in other existing employment sites around the town.

Area of Search 9: Buntingford East: 500 dwellings

- 5.2.72 Local-area opportunities:** This location is very well located in terms of access to the A10 and other employment opportunities at the former Sainsbury's Distribution Depot in the south of the town, if employment land was located south of Owles Lane. However, this location would be further away from the town centre.
- 5.2.73** There are several small employment sites around and near to the town from which new employment opportunities could build. However, the existing sites may not be suitable for modern or changing businesses.
- 5.2.74 Wider-area opportunities:** This area of search is well suited in terms of potential access to the A10 heading south of the town and also to the proposed distribution centre at the Former Sainsbury's Distribution Depot site. If access could be achieved either through or around the depot site, this would be a significant advantage for this area of search. As has already been discussed, the town's distance from major employment centres is a disadvantage for some businesses. However, there are advantages for locally linked businesses who are not reliant on access to major road or rail networks and who do not require a large labour pool.

5.2.75 Investment barriers: As has already been noted, the greatest infrastructure barrier to preventing large scale employment development in this area of search is the lack of access to motorway and rail services. At a more area-specific level, improved access to the A10 would make employment land more attractive. This is likely to entail a new link road either from or around the proposed distribution centre. Whether this is possible or not has not been determined and would require further evidence prior to making a decision.

5.2.76 Prospects for employment: The potential need for a new access to the A10 may affect the viability of employment land in this area of search. If access could be achieved through the distribution centre, this would be more cost-effective than providing a new link road around this existing site. Without this access, employment land is less attractive and may affect the suitability of the site for employment land purposes.

Key Points: Economic Development Opportunities in Buntingford

5.2.77 Whatever scale of residential development is proposed for Buntingford, there will be an increased need for additional retail and education provision within the town, including within pre-school, primary, middle and upper education tiers, which would in themselves create employment opportunities in these industries. The Strategic Economic Development Advice suggests that should the town grow with new residential development which consists of affordable housing, it will be necessary to ensure the provision of local employment opportunities.

5.2.78 Buntingford businesses are unique in the District in that they thrive despite their distance from motorway and rail connections and proximity to major employment centres that most businesses rely on. Businesses within and around Buntingford instead appear to have local links serving the local area and the rural hinterland around the town.

5.2.79 It would be most cost-effective and appropriate to seek to expand existing sites, particularly those performing well with the potential for improvement such as Buntingford Business Park and the Park Farm Industrial Estate. To create new employment land in the town is considered to be unachievable if it is solely for employment uses. Mixed use residential-led schemes may prove viable in the longer term, but should be planned to provide small to medium sized units for local small or expanding businesses.

Hertford

5.2.80 Hertford and Ware are considered together within the DTZ independent consultant's report, for while their separate identities and town centres are recognised, they are likely to be regarded as a single location in terms of the industrial and commercial property market. Due to their proximity to

Hatfield Business Park and other prospective prestige developments in neighbouring authority areas, it is considered that it would be difficult for the towns to attract investment for a similar development.

- 5.2.81** There is a strong presence of public sector employment in the two towns, notably Hertford, and an expected decline in this sector in future years could particularly affect them.
- 5.2.82** There are considered to be excellent rail and road links from both Hertford and Ware to London and intermediate settlements, and to towns in surrounding districts, where DTZ expect it to be easier to grow employment bases than the two towns.
- 5.2.83** However, it is thought that the benefit of considering significant residential development in and around both towns would be the reinforcement of the town centres by growing the catchment population, and potentially attracting small scale office occupiers to locate there. Nonetheless, the impact of road based out commuting on existing road networks would need to be weighed against this.
- 5.2.84** The report further identifies the need to rejuvenate existing employment areas to accommodate the shift to business service employment and includes Mead Lane and the Foxholes/Caxton Hill areas in this category. Furthermore, consideration should also be given to identifying a small number of modest sites for B1 employment; preferably where there is reasonably good access to the trunk road system and in a visible location. These may be delivered in conjunction with new residential development.
- 5.2.85** Given the foregoing context, the four remaining areas of search for Hertford have been considered against the potential implications for employment and economic development, based upon their potential scale of development and their relationship to the local and wider area. In terms of future economic development, the following observations may be made:

Area of Search 10: Hertford Built-Up Area: 875 dwellings

- 5.2.86** **Local-area opportunities:** This is the highest level of growth scenario being considered for the town; although it should be borne in mind that, of the 875 dwellings proposed, 385 already have the benefit of planning permission, leaving around 490 dwellings to be delivered in the urban context. Of these, it is anticipated that 300 would be located in the Mead Lane area on vacant brownfield sites. The Council is in the process of developing an Urban Design Framework for the area, which has already been the subject of public consultation. This draft document envisages that the delivery of around 300 dwellings in the area would also serve as a catalyst for the provision of around 3,000 sqm of B1 employment development within the boundaries of the existing designated employment area.

- 5.2.87** The remaining potential opportunities for development within the urban context are likely to be delivered on a range of small sites. It is therefore considered that there would be only very limited opportunities to create additional employment from this level of development. However, some of these new occupants may potentially benefit from any new employment development provided in the Mead Lane area.
- 5.2.88** **Wider-area opportunities:** In terms of the town as a whole, this level of development may assist in maintaining the viability of the town centre as well as boosting the existing Mead Lane designated Employment Area, and possibly other existing employment sites and businesses. The close proximity of Hertford East Station to the Mead Lane area would mean that any new development in this location that led to out commuting by rail from this station would not be likely to involve additional car borne journeys. However, those journeys made by private motorised transport would add to existing congestion issues in the town centre.
- 5.2.89** While development in other parts of the urban area may not lead to creation of jobs in those locations, there is the potential that a small proportion of new occupiers would be employers of small businesses.
- 5.2.90** The town's good access to London via its choice of two rail links and by other transport modes to higher order towns in the locality enables high numbers of residents to easily out commute. The availability of bus transport to a wide variety of destinations, from both the central core and other locations throughout the town, supplements this sustainable transport offer; however, car borne journeys are likely to continue to feature highly in the modal split, exacerbating Hertford's existing congestion problems.
- 5.2.91** The town's retail offer is unlikely to be greatly affected by this level of development beyond helping to maintain the viability of the existing offer and potentially providing employment for some new residents.
- 5.2.92** Hertford benefits from its relationship to the A414 and A10 and the proximity to the M11, M25 and A1(M) beyond the district for both outward travel and for businesses wishing to locate in the town. The potential advantages gained from new employment development would depend on the type of new business created. While some enterprises may prefer a town centre location with good access to shops, services and rail connections, light industrial or warehouse based businesses tend to naturally locate close to main access routes where possible, and may therefore have little connection with the town itself or its existing, more centrally located, employment sites. These could result in less sustainable travel patterns than for more central locations.
- 5.2.93** **Investment barriers:** In the context of development in the Mead Lane area, the draft Mead Lane Urban Design Framework lists various interventions that will be required to facilitate development. These include

a number of key infrastructure features including, but not limited to, a new link road and passenger transport interchange north of Hertford East station; secondary point of access for sole emergency vehicle use; pedestrian and cycle improvements; bridge link; improved vehicle circulation; and improved bus penetration within the larger Mead Lane employment area.

5.2.94 For the wider urban context, specific measures have been identified within the Hertford and Ware Urban Transport Plan for which contributions towards could be required as appropriate, depending on the level of development proposed. In respect of specific employment area schemes, the removal of an obstruction between the Foxholes and Caxton Hill estates has been identified to facilitate improved vehicular access to the main road network from the Caxton Hill area and aid the reduction of congestion in the town centre.

5.2.95 Some of the older existing employment sites in Hertford may need considerable investment to ensure they are fit for purpose for modern and changing businesses. However, given that many of the issues faced by existing employment sites relate to being physically constrained, it is unlikely that these issues could be overcome with new hard infrastructure.

5.2.96 Should additional employment sites be identified, these should ideally be located close to major road networks and would need to make provision for necessary infrastructure, as commensurate.

5.2.97 **Prospects for employment:** In respect of the Mead Lane area, there should be significant opportunities for mixed use development to enable regeneration of the area. However, due to the need to form a buffer between new residential elements and the more general existing employment activities, some involving non-neighbourly uses, any new employment provision should be limited to B1 uses. While it is anticipated that new infrastructure requirements would be funded by development, issues relating to multiple land ownership, remediation, and co-ordination of delivery, could mean that this area may not be developed during the earliest phases of the plan period.

5.2.98 The remaining minor residential development locations would be far less likely to offer direct employment opportunities beyond home working or very small scale enterprises at most.

Area of Search 11: Hertford West: 600 dwellings

5.2.99 **Local-area opportunities:** In terms of locally arising opportunities to access existing employment, while there is little direct provision beyond schools and the parade of shops at Fleming Crescent, this Area of Search is well located in terms of access to bus services to the town centre and some other locations in the town.

- 5.2.100** Given the proximity to Fleming Crescent and the level of residential development proposed, there would not likely be the need for further local retail services in the area. In terms of more general employment provision of a B1 use class nature within the area itself, there is good access to the nearby A414 and this could be viewed as attractive to investors due to its likely visibility. However, any employment provision would be at the expense of the area’s ability to maximise its potential for residential provision. Therefore, a choice would need to be made in this respect.
- 5.2.101 Wider-area opportunities:** The area is very well positioned for pedestrian access to Hertford North station and its connections to London, Stevenage and wider destinations. Bus services, either adjacent to the Area of Search or in close proximity in the Sele Farm area, provide sustainable access opportunities to a wide range of locations. However, for car borne commuters there would be good access to the wider road network, which if travelling in a westerly direction would have less impact on the town’s congestion problems than development in some other locations.
- 5.2.102 Investment barriers:** There would be no significant infrastructure barriers to locating employment land in this area of search, beyond the need to protect existing natural heritage and wildlife assets, and it is unlikely that further major infrastructure would be required in this respect as the use of existing infrastructure would probably be sufficient. However, any significant employment provision at this location would be at the expense of residential delivery.
- 5.2.103 Prospects for employment:** While this Area of Search could deliver an element of employment provision, it is more likely that its attractiveness for future development potential would lie for predominantly residential use. A series of past leisure schemes that were granted permission over a number of years, which would have resulted in job creation on around half of the developable area, remain unimplemented. Furthermore, given its proximity to rail, bus and road access to locally arising and wider employment opportunities, it is considered unlikely that significant additional employment opportunities would be created in this location.

Area of Search 12: Hertford North - Sub-Area C: 100 dwellings

- 5.2.104 Local-area opportunities:** In terms of locally arising opportunities to access existing employment, while there is little direct provision in the immediate area beyond Bengoe Primary school, the few shops in Bengoe Street and the small parade of shops in The Avenue, this Area of Search would be well located in terms of access to a bus route which serves the town centre and its many employment opportunities. Depending on location of development, the town centre could also be accessed on foot.

- 5.2.105** It is considered unlikely that this level of development would create any new employment enterprises on its own in the local area; although the increase in population could help support the town's existing economic base.
- 5.2.106** In terms of considering the establishment of employment opportunities on its own terms, the area would have the potential to access the A602 and A10 via B158, although these are some distance away from the area. The A414 could be accessed via the town centre, but there are recognised congestion problems in the locality and this may be seen as an impediment by potential employers. The effects of the additional traffic generated by the development would also need to be considered further in this context.
- 5.2.107** **Wider-area opportunities:** With high levels of out commuting in the town, access to the town centre by bus would enable wider connections, both via this mode of transport and to rail travel via a walk to Hertford East station. Hertford North station is slightly further away, with no current direct bus connection and 'rat-running' issues through lower Bengoe are well documented, with potential measures to restrict access detailed in the Hertford and Ware Urban Transport Plan.
- 5.2.108** As stated above, the area would have the ability to connect to 'A' roads in the vicinity to enable access to wider employment bases, but this would only be likely to satisfy car-borne journeys.
- 5.2.109** **Investment barriers:** There would be no significant infrastructure barriers to locating employment land in this area of search, beyond addressing potential waste water issues and the assessment of impact in relation to trip generation. It is likely that the use of existing road infrastructure could be possible; however, any new employment allocations in this area should ensure that any new infrastructure requirements subsequently identified are self funded.
- 5.2.110** **Prospects for employment:** Given the lack of visibility of this area in relation to the primary route network and the existing congestion restraints in the locality, it is considered unlikely that significant employment development would be appropriate, especially for the level of residential development proposed.
- 5.2.111** It is therefore considered more likely direct employment opportunities would be limited to home working or very small scale enterprises.

Area of Search 13: Hertford South - Sub-Area C: 100 dwellings

- 5.2.112** **Local-area opportunities:** While this area is somewhat remote from designated employment sites other than Foxholes, job opportunities may be available at the public sector District and County Council office bases; Post Office sorting office; and various schools in the locality which could

all be reasonably accessed by most people on foot. The town centre is located further away and, with no regular bus service beyond a school service, either a more lengthy walk or car borne journeys would be required.

- 5.2.113** For this level of growth and with the area currently under consideration being constrained by existing development and natural features it is not anticipated that any new employment opportunities would present themselves beyond home working.
- 5.2.114** **Wider-area opportunities:** While Hertford East and Hertford North stations enable good access to London and wider destinations, these would be some distance from the area. Therefore, these may imply additional car borne journeys; although the C3 bus service serves a stop in nearby London Road towards the town centre which may facilitate access to Hertford East.
- 5.2.115** As no other bus routes serve the locality, it is likely that other outward bound travel to wider employment bases would generally be made by car. With the A414 and A10 in close proximity, this may prove an attractive option for future residents.
- 5.2.116** **Investment barriers:** While there would be no significant infrastructure barriers to locating employment land in this area of search, and the use of existing infrastructure would be applicable for this level of development, the narrowness of Mangrove Road would limit the size of vehicle that would be appropriate for regular access to any enterprise established.
- 5.2.117** **Prospects for employment:** Although the area is located in close proximity to the A414 and to the A10 beyond, the part of the Area of Search under consideration is constrained by residential development on two sides and by the nature of Mangrove Road. It is therefore considered more likely that a residential development would be preferred in this location and that direct employment opportunities would be limited to home working or very small scale enterprises.
- 5.2.118** Should further employment allocations be made beyond those existing, they should ensure that new infrastructure requirements are self funded.

Key Points: Economic Development Opportunities in Hertford

- 5.2.119** Whilst Hertford currently has a large public sector base, and every opportunity should be taken to retain this, recent shrinkage in this area is predicted to continue, at least in the short term, and therefore any expansion of this element of the employment market is not considered likely.

- 5.2.120** Proposals for growth in the Mead Lane area offer the best potential for large scale employment expansion for the town (approximately 3,000 sqm) via mixed use proposals for the area; albeit that this would be subject to the delivery of various elements of infrastructure to support such development.
- 5.2.121** For other existing employment areas, and given that the repositioning of older industrial estates would prove problematic, consideration should be given towards investment to ensure competitiveness with more modern and, in some cases, more easily accessible, ventures.
- 5.2.122** The levels of growth proposed for Hertford as a whole would in themselves create a need for employment opportunities and, with the exception of the Mead Lane area, it is not considered likely that significant scale employment areas would be facilitated by the levels of development proposed. It is therefore considered likely that, as these would not be of a sufficient scale to contain the increased work-age population, there would be an increase in out commuting to neighbouring higher order centres or further beyond, e.g. London. In this respect, given the distances from some of these areas to the railway stations, likely bus availability, and close proximity of the major route network, it would be anticipated that many of these out commuting journeys would be made by private motorised transport.
- 5.2.123** Population increase of the levels suggested in Hertford could have some detrimental effect on the existing businesses in the town, due to additional car journeys generated and resultant increased congestion where there are already known issues (most notably the A414 and the Bengoe/Old Cross areas), especially at peak times. Conversely, the increased population could help support the existing retail and service enterprises in the town centre, including the burgeoning evening economy.
- 5.2.124** Taking all of the above into account, and based solely on the evaluation of economic matters, it is considered that on balance it would be appropriate to support the levels of development proposed for Hertford.

Sawbridgeworth

- 5.2.125** Sawbridgeworth is a small market town located approximately midway between Bishop's Stortford and Harlow on the A1184. The town benefits from a rail service to London, Stansted Airport and Cambridge. However, because of this, Sawbridgeworth suffers from a high proportion of out-commuting to the neighbouring larger towns and by rail. Traditional businesses located along the River Stort at The Maltings, just outside the district boundary have now given way to antique trading and repairs and the town centre is contained by its historic environment. In terms of future economic development, the following observations may be made:

- 5.2.126 Local-area opportunities:** The existing built-up area is physically constrained and as such is unlikely to yield sites suitable for employment uses. One large site that could be considered large enough for employment development is the Sawbridgeworth Football Club ground at Crofters to the northwest of the existing built-up area. However, access would not be achievable from the A1184 and as such would only be suitable for small local employers.
- 5.2.127 Wider-area opportunities:** In terms of the town as a whole, new residential development may assist in maintaining the viability of the town centre, but is unlikely to create new employment opportunities, apart from the possibility that a small proportion of new occupiers would be employers of small businesses. The town's relatively good access to neighbouring higher order towns with their substantial employment opportunities, and even London and Stansted Airport, enable high numbers of residents to commute out of the town with relative ease. This proximity to other major employment centres means that business occupiers are more likely to favour these locationally preferential sites than any in Sawbridgeworth.
- 5.2.128 Investment barriers:** Because it is not expected that this level of development would create additional employment opportunities, no additional infrastructure would be needed.
- 5.2.129 Prospects for employment:** There are currently unknowns over the viability of development at the Crofters football ground. This development opportunity hinges on whether the football club would be prepared to move ground and sell their current site. This in itself depends upon whether another landowner is prepared to sacrifice land for a new football ground. There are potentially three landowners involved and until this matter is resolved there are questions over the potential viability of development at the football ground. Compared to other locations available within the travel to work area within which Sawbridgeworth is centrally located, employers are unlikely to prefer Sawbridgeworth.

Area of Search 16: Sawbridgeworth West - Sub-Area A and B - North and South of West Road: 200 dwellings

- 5.2.130 Local-area opportunities:** Employment development in these locations would not be well located in terms of access to major roads. The location is within reasonable distance from the town centre but is located some distance from Sawbridgeworth Station with no realistic possibility of improving bus services to create alternative means of travel. The existing Maltings employment land specialises in antique trading and repairs and as such it would be difficult for new businesses to create effective links with the existing businesses. Employment land to the north of West Road would be either adjacent to or close to Mandeville Primary School and

such proximity would be unsafe and inappropriate. Employment land to the south of West Road would be more suitable than north but neither would be an attractive location for new businesses.

- 5.2.131 Wider-area opportunities:** In terms of the town as a whole, this level of development may assist in maintaining the viability of the town centre, but again would not result in the creation of new employment, apart from the possibility that a small proportion of new occupiers would be employers of small businesses. The town's relatively good access to neighbouring higher order towns and even London and Stansted Airport, enable high numbers of residents to commute out of the town with relative ease.
- 5.2.132 Investment barriers:** Land to the south of West Road was previously listed as being within a Flood Zone. Landowner discussions with the Environment Agency have resulted in the EA amending their flood zones to discount much of the area of search from being at risk of flooding. Regardless of this, it may be necessary for development to include some flood attenuation measures. This quantum of development may increase the need for local employment opportunities within the area but would not necessarily be able to facilitate the infrastructure gains necessary to serve new employment land or residential development such as a new bus route. Transport links east to west across the town are limited and would not be suitable to serve a new employment area.
- 5.2.133 Prospects for employment:** Flood attenuation measures required for land to the south of West Road may impact on viability depending upon the location and layout of development in this area. Development to the north of West Road would need to donate or sell land to the County council for the expansion of the Mandeville Primary School to enable the expansion of facilities at the school to accommodate the additional pupils 200 dwellings would generate.
- 5.2.134** Employment land located in this area of search would not function well alongside existing employment areas within Sawbridgeworth. The Maltings employment area located adjacent to the River Stort benefits from its close proximity to Sawbridgeworth Rail Station. The Maltings focuses mostly in antique restoration and trading. Being a niche market, it is unlikely that new employment to the west of the town would be able to feed off the existing employment area.

Area of Search 16: Sawbridgeworth West - Sub-Area A and B and Area of Search 17: Sawbridgeworth North - Sub-Area A: 2,800 dwellings with a bypass to the west of the town

- 5.2.135 Local-area opportunities:** A development of this scale would result in the need for additional retail and employment opportunities within the development. Much of the land would be beyond comfortable walking distance to the existing retail areas within Sawbridgeworth and would

ideally contain at least one new neighbourhood centre or local shopping parade. It would also generate the need for expanded schools to serve the development.

5.2.136 Wider-area opportunities: Although this quantum of development would ideally contain employment areas, in this location new employment land would not be attractive to employers. Given the location of the area of search and Sawbridgeworth as a whole lying between the higher order centres of Bishop’s Stortford and Harlow, new employment land here would not be able to compete against existing employment areas with relatively good access to major roads and supporting businesses. Small sites may however still be appropriate.

5.2.137 Investment barriers: New development of this quantum would generate a need for a new bypass to the west of the town surrounding the new development. The construction of this new road and the new development itself would provide some short term employment opportunities during the construction phase. The greatest infrastructure constraint to new employment land here is that even with a bypass, other locations have a greater number of supporting services and businesses and are in better locations for access to major roads. New bus routes would be needed from the development to the rail station in the north-east of the town and to Bishop’s Stortford and Harlow, in order to provide alternative means of transport.

5.2.138 Prospects for employment: The constraints discussed would prohibit the viability of employment development in this location. Not only would new employment land compete against established centres and the new Enterprise Zone in Harlow, but would also need to contribute towards the funding of a new bypass to facilitate development in this area.

Key Points: Economic Development Opportunities in Sawbridgeworth

5.2.139 If any options were to be discontinued further on the basis of the above considerations on economic matters alone, then development to the west of the town of circa 2,800 dwellings within a new bypass would not continue. Employment land would not be suitable within this development for the reasons already stated, yet this quantum of development would create a need for employment opportunities. These opportunities would only be provided outside the town in neighbouring higher order centres, or beyond in London, Stansted Airport or Cambridge. Out commuting and leakage of expenditure is already a significant issue for Sawbridgeworth. This option would exacerbate an existing problem, offering no benefit apart from a new bypass which may ease the journey of those commuting out of and past the town.

- 5.2.140** Ware is considered together with Hertford in the DTZ independent consultant's report, for while their separate identities and town centres are recognised, they are likely to be regarded as a single location in terms of the industrial and commercial property market. Due to their proximity to Hatfield Business Park and other prospective prestige developments in neighbouring authority areas, it is considered that it would be difficult for the towns to attract investment for a similar development.
- 5.2.141** An anticipated decline in the strong presence of public sector employment in the two towns in future years could particularly affect them; however, Ware is not expected to be as badly effected as Hertford in this respect.
- 5.2.142** Located in Ware, GSK is the largest private sector employer in the district and retention of this facility is an important objective; coupled with the potential for the company to grow its presence.
- 5.2.143** There are considered to be excellent rail and road links from both Ware and Hertford to London and intermediate settlements, and to towns in surrounding districts, where DTZ expect that it will be easier to grow employment bases than in these two towns.
- 5.2.144** However, although not likely to be significant attractors, it is thought that the benefit of considering significant residential development in and around both towns would be the reinforcement of the town centres by growing the catchment population, and potentially attracting small scale office occupiers to locate there. Nonetheless, the impact of road based out commuting on existing road networks would need to be weighed against this.
- 5.2.145** The report further identifies the need to rejuvenate existing employment areas to accommodate the shift to business service employment. Moreover, consideration should also be given to identifying a small number of modest sites for B1 employment; preferably where there is reasonably good access to the trunk road system and in a visible location. These may be delivered in conjunction with new residential development.
- 5.2.146** Given the preceding context, the three remaining areas of search for Ware have been considered against the potential implications for employment and economic development, based upon their potential scale of development and their relationship to the local and wider area. In terms of future economic development, the following observations may be made:

Area of Search 18: Ware Existing Built-Up Area: 147 dwellings

- 5.2.147 Local-area opportunities:** This is the lowest amount level of growth scenario being considered for the town; although it should be borne in mind that 113 of these dwellings already have the benefit of planning permission and therefore only around 34 dwellings would remain to be

delivered on a range of small sites in the urban context. It is therefore considered that there would be only very limited opportunities to create additional employment from this level of development.

- 5.2.148 Wider-area opportunities:** For consideration of the town as a whole, this level of development may assist in maintaining the viability of the town centre, but again would not be likely to result in the creation of new employment, apart from the potential that a small proportion of new occupiers would be employers of small businesses. The town’s relatively good access to London via its rail link and by other transport modes to higher order towns in the locality enables high numbers of residents to easily out commute.
- 5.2.149 Investment barriers:** Some of the older existing employment sites in Ware may need considerable investment to ensure they are fit for purpose for modern and changing businesses. However, given that many of the issues faced by existing employment sites relate to being physically constrained, it is unlikely that these issues could be overcome with new hard infrastructure.
- 5.2.150** For development in the wider urban context, specific measures have been identified within the Hertford and Ware Urban Transport Plan for which contributions towards schemes could be required, as appropriate, depending on the level of development proposed. Apart from any measures arising from this document, the small levels of residential development proposed would be likely to be accommodated within existing infrastructure. As this level of residential development would be unlikely to create significant additional employment opportunities, no further major infrastructure would be required in this respect.
- 5.2.151** Should additional employment sites be identified, these should ideally be located close to major road networks and would need to make provision for necessary infrastructure, as commensurate.
- 5.2.152 Prospects for employment:** As the level of residential development envisaged for the existing built up area of Ware is minimal, and the urban area is generally constrained, it is considered that, beyond any revitalisation of existing employment areas, the potential for further significant job creation would be minimal.
- 5.2.153** Therefore, the remaining minor residential development locations would be most unlikely to offer direct employment opportunities beyond home working or very small scale enterprises at the most.

Area of Search 19: Ware North: 200 dwellings or 1,700 dwellings

- 5.2.154 Local-area opportunities:** The two scenarios for the numbers of dwellings under consideration for this area would have completely different effects in terms of economic potential.
- 5.2.155** For a 200 dwelling development the effects would be minimal beyond the need for additional education provision at pre-school, primary and secondary level, which may create a small number of employment opportunities in the service (education) sector. One or more of the existing schools in the area may have the potential to be expanded to accommodate the additional need, subject to further investigation.
- 5.2.156** However, it is considered unlikely that this level of development would create any new employment enterprises on its own in the local area; although the increase in population could help support the town's existing economic base.
- 5.2.157** For a development level up to 1,700 dwellings, the effects of development at this scale would result in the need for additional retail and employment opportunities within the development. In terms of retail, as a large part of area would be beyond comfortable walking distance to the existing town centre retail area (although parts maybe within a comfortable distance of the Kingshill local shopping parade), the new development should therefore ideally contain at least one new neighbourhood centre or local shopping parade. A need for new or expanded schools to serve the development would also be generated. These facilities could provide further employment opportunities in the local area.
- 5.2.158** In terms of more general employment potential, the area would be well placed via its connections to the A10 via the A1170 to provide good access to the wider primary route network. Depending on siting in terms of proximity to the A10, there could be opportunities for enabling good visibility which may make the area an appealing location for potential employers. The Ermine Point/Gentleman's Field existing employment site, which was developed in the 1980's, is also located nearby and it too is well positioned for access to the A10 and visible in this respect.
- 5.2.159 Wider-area opportunities:** In considering the wider-area opportunities for the lower level of development, this would not be likely to result in the creation of new employment, apart from the potential that a small proportion of new occupiers could be employers with small businesses in the town. On the other hand, it may assist in maintaining the viability of the town centre. Although it should be noted that the area is some distance from the railway station, the town's relatively good access to London via its rail link, and by other transport modes to higher order towns in the locality enables high numbers of residents to easily out commute. However, depending on location, the additional motorised traffic utilising the town

centre to access the wider road network and resultant additional congestion could have a negative impact on the town's attractiveness for employers choosing to locate in the area.

- 5.2.160** For the higher level of development, this level of development would be out of scale with retail and employment provision and other facilities of the town. While this quantum of development should ideally contain employment uses to at least help address the scale of employment issue, there is a concern that the provision of a new employment area of significant size in this location could have a detrimental effect on some of Ware's existing designated employment sites. In particular, those older employment areas in less accessible locations to the south and east of the town centre could be more vulnerable, especially if businesses should choose to relocate.
- 5.2.161** It is anticipated that this level of development would generate a high level of out commuting, which, given the distance from the railway station and likelihood that frequency of bus provision would not necessarily be enough to engender modal shift, could lead to significant motorised journeys being made.
- 5.2.162** For retail provision it is noted that an ASDA superstore has the benefit of planning permission in Watton Road; however, this is some distance from the Area of Search and would be likely to generate additional motorised trips to that part of town. There is little scope for further retail expansion within the central core of the town as it is constrained by the existing historic built form.
- 5.2.163** Existing businesses in the town could also be more detrimentally affected by higher levels of traffic and inter-related town centre congestion generated by the larger scale of development than by a lower case scenario.
- 5.2.164** **Investment barriers:** While there would be no significant infrastructure barriers to the small level of development proposed in the High Oak Road area under the lower dwelling number scenario, as this would be likely to be mostly accommodated within existing infrastructure, the attractiveness of the area for investment in employment provision would be open to question. Firstly, the topography of the area could make employment provision challenging. Secondly, the area would be in a non-visible location, remote from the primary route network; and, importantly, the local road network would not be conducive to high levels of trip generation that could be occasioned by a thriving enterprise. The level of development proposed in this particular location would be insufficient to help mitigate any of these issues.
- 5.2.165** For the higher level of dwellings, this quantum would generate a need for a new road to both serve the development and to link the A1170 to the west to the High Oak Road area to the south east of the Area of Search

The construction of this new road and the new development would themselves provide some short term employment opportunities during the construction phase. With regard to longer-term employment needs, potential infrastructure barriers (in addition to new highway infrastructure listed), would include the expansion of the town's existing bus services, ensuring that opportunities for sustainable travel to both the railway station and wider destinations be made available; new educational provision beyond the expansion of existing facilities; and the need for significant sewerage infrastructure. However, given the level of growth proposed, it is likely that all these infrastructure requirements would be supported by the development.

5.2.166 Prospects for employment: For 200 dwellings in the High Oak Road area, in terms of employment provision, while this quantum of development may increase the need for local employment opportunities within the town, the non-visible location away from the primary route network, constrained local road network, and the area's general topography, would probably mean that this location would be unlikely facilitate the provision of new employment land itself.

5.2.167 For around 1,700 dwellings, it would be expected that development of this scale should be able to support the provision of all necessary infrastructure to enable both residential and employment provision in the area. The general location may prove attractive to inward investment for employment provision, especially on the western side, due to close proximity to the primary route network. Also, the level of development suggested would probably be such as to support some local retail and employment provision. However, the distance from the railway station to serve the development from wider locations by sustainable transport modes, and, importantly, the potential effects on the town's existing employment areas, would lead the suitability of the area for any larger scale facilities to be questioned.

Area of Search 20: Ware East (Sub-Area A only) – 1,300 dwellings

5.2.168 Local-area opportunities: The effects of development at this scale would result in the need for additional retail and employment opportunities within the development. In terms of retail, the majority of the area would be beyond comfortable walking distance to the existing town centre retail area and the new development should therefore ideally contain at least one new neighbourhood centre or local shopping parade. A need for new or expanded schools to serve the development would also be generated. These facilities could provide further employment opportunities in the local area. The southern part of the area would be located in fairly close proximity to the existing Star Street/Widbury Hill designated Employment Area, which could provide job opportunities for some residents; however, the extent of this employment location has reduced in the recent past with a mixed use development covering a large part of the Widbury Hill area.

- 5.2.169** In terms of more general employment potential, the area would currently be somewhat isolated with a lack of visibility and poor road communications. These factors could deter potential investors from choosing this location to establish their businesses. However, should the area be developed in conjunction with land to the north of Ware (Area of Search 19), the construction of a new link road from the Widbury Hill area to the A1170 to the north of the town to enable connections to the A10 could improve the attractiveness of the location to a degree.
- 5.2.170** **Wider-area opportunities:** This level of development would be out of scale with retail and employment provision and other facilities of the town. While this amount of development would ideally contain employment uses to at least help address the scale of employment issue, there is a concern that the provision of a new employment area of significant size in this location may have a detrimental effect on some of Ware's existing designated employment sites. In particular, those older employment areas in less accessible locations to the south and east of the town centre could be more vulnerable, especially if businesses should choose to relocate.
- 5.2.171** It is anticipated that this level of development would generate a high level of out commuting, which, given the distance from the railway station and likelihood that frequency of bus provision would not necessarily be enough to engender modal shift, could lead to significant motorised journeys being made.
- 5.2.172** For retail provision it is noted that an ASDA superstore has the benefit of planning permission in Watton Road; however, this is a considerable distance from the Area of Search and would be likely to generate additional motorised trips to that part of town, which would be likely to cause further congestion, mainly in the High Street, but would also be likely to affect other roads in its vicinity. There is little scope for further retail expansion within the central core of the town as it is constrained by the existing historic built form.
- 5.2.173** Existing businesses in the town could also be detrimentally affected by higher levels of traffic and inter-related town centre congestion generated by the large scale of development.
- 5.2.174** **Investment barriers:** New development at this level would generate a need for a new link road from the Widbury Hill area to enable connections to the A10 via the A1170 to the north of the town. The construction of this new road and the new development would themselves provide some short term employment opportunities during the construction phase. With regard to longer-term employment needs, potential infrastructure barriers (in addition to new highway infrastructure listed), would include the expansion of the town's existing bus services, ensuring that opportunities for sustainable travel to both the railway station and wider destinations be

made available; new educational provision beyond the expansion of existing facilities. However, given the level of growth proposed, it is likely that all these infrastructure requirements would be supported by the development.

5.2.175 A greater barrier to potential employment investment may be the location of the development, given that it would be some distance away from the primary route network and, even with the provision of a new link road, would not be in a clearly visible location.

5.2.176 **Prospects for employment:** For around 1,300 dwellings, it would be expected that development of this scale should be able to support the provision of all necessary infrastructure as detailed above; however, its location may preclude inward investment beyond the support of some local retail and employment provision. Distance from the railway station to serve the development from wider locations by sustainable transport modes, coupled with the effects on the local road network would also be a concern. Importantly, the potential effects on the town's existing employment areas, would lead the suitability of the area for any larger scale facilities to be called into question.

Key Points: Economic Development Opportunities in Ware

5.2.177 Whilst Ware is home to the district's largest private sector employer, GSK, and every opportunity should be taken to retain this base, the potential for other large-scale enterprises to locate to the town is considered remote.

5.2.178 For the larger dwelling number options under consideration, the provision of a significant amount of employment land within these locations, would need to be balanced against the factors already stated, yet these levels of residential development would themselves create a need for employment opportunities. While the larger levels of development suggested for the areas to the north and east of the town could enable the provision of some smaller employment facilities, it is likely that these would not be of a sufficient scale or nature to contain the large increase in the work-age population and stem a significant growth in out commuting from the town. Opportunities for employment would be most likely to be provided outside the town in neighbouring higher order centres or further beyond, e.g. London. In this respect, given the distances from these areas to the railway station and the anticipated limited bus provision levels to be associated with these amounts of development taken in the wider network context, it would be anticipated that many of these out commuting journeys would be made by private motorised transport.

5.2.179 Furthermore, the increased population could have a detrimental effect on the existing businesses in the town due to the likely levels of additional car journeys generated and resultant increased congestion in an area already experiencing known issues (most notably the High Street), especially at peak times. These effects on the continued viability of existing

employment areas could also become an issue and investment in these is likely to be required to maximise their potential to compete against alternative, more recently constructed facilities elsewhere.

- 5.2.180** The dichotomy could be that, while new employment development provided in conjunction with residential growth may be attractive in some locations to prospective employers and employees, notably to the north of Ware, employment provision beyond the small scale in these areas may exacerbate viability issues for the town's existing employment areas and other town centre businesses, as previously outlined.
- 5.2.181** Therefore, if based solely on the consideration of economic matters, due to the issues raised above, it would not be appropriate to support the higher level ranges of development, especially if provided in combination.

Villages

- 5.2.182** Given that the potential scale of any development in villages across the District is not likely to be of a strategic scale it is therefore likely that any employment opportunities created by new development would also be of a small-scale for local employers. Residents living in villages have often made that decision with the full acknowledgement that they would be required to travel significant distances often by private car to access employment. This is one reason for the comparatively older age of residents in villages and rural locations, with high proportions of retired people, higher-skilled occupations, home workers or those families who can afford and do not mind travelling to work.
- 5.2.183** A higher proportion of the population working from home is partly associated with the greater preponderance of self-employment or owners of small businesses among older skilled workers. This opportunity however, would be dependant upon whether the village has good broadband access.
- 5.2.184** The provision of residential development in villages will not fundamentally alter these demographic, lifestyle and working patterns. Appropriate small scale provision of employment space in larger villages that already have a greater number of local services will help to sustain a local employment base, though in practice, the great majority of those working in rural premises are likely to be drawn from quite a wide area. A way to assist those who currently work from home or run small rural-based businesses would be to encourage the provision of rural office hubs - a general office facility that can be used by a number of users as and when they need such facilities. Another important measure would be to seek to limit the need for increased car based journeys as a result of village growth by ensuring all villages are able to access high quality broadband internet services.

Area of Search 61: East of Welwyn Garden City - 2,000 dwellings

- 5.2.185** If it were to come forward as part of the District Plan, this area of search would form an urban extension to the eastern boundary of Welwyn Garden City into land in East Herts. One of Ebenezer Howard's original New Towns, the town was planned to provide sufficient employment opportunities for its residents to be self-sustaining in employment terms. However, modern lifestyles and changing economic activities over the last century since the town was designed have diminished this self-sufficiency. Travel to Work areas are growing as people are willing and able to travel greater distances to seek employment, particularly in specialist industries. As such, the original employment areas within Welwyn Garden City are gradually being superseded by more modern employment areas located along the A1(M).
- 5.2.186** **Local area opportunities:** Development of this scale would result in a need for employment opportunities, education facilities at all tiers and all the necessary community facilities a new neighbourhood would require. A new neighbourhood retail centre is likely given the distance any new development would be from the town centre and edge of centre retail areas. These community needs are likely to generate employment opportunities for new residents.
- 5.2.187** Welwyn Garden City has extensive areas of employment land in the north west of the town, which have become surrounded by residential estates over time. These older employment estates have been somewhat undermined by more modern business parks and employment areas located on the edges of Welwyn Garden City and neighbouring Hatfield and Stevenage. This area of search is well placed to gain access to both the A414 and the City Park and Mundells employment areas in reasonably close proximity along the B195 and A1000 (Bessemer Road). If employment land was located at the junction of the B195 and the A414, it would be a highly visible development but would be located at some distance from the existing residential areas. However, if employment land was to come forward as part of a wider mixed-use development scheme there would be opportunities to make sufficient public transport links to the area.
- 5.2.188** **Wider area opportunities:** Welwyn Garden City lies within the Stevenage Travel to Work Area, sometimes known as the A1(M) corridor. This TTWA extends from Hatfield in the south to Biggleswade in the north. However, the location of Welwyn Garden City being adjacent to the A414 in close proximity to Hertford, this area of search could also function as part of a more locally significant A414 corridor.
- 5.2.189** Being close to the A1(M), there are potential advantages to this location in terms of being within reasonable travel time of major employment centres along the A1(M) such as Hatfield Business Park, Knebworth Innovation Park and the Gunnells Wood Employment Area. However, given that these major employment centres are much larger, already established and have a prestige and better access to the A1(M), this area of search is unlikely to attract major employers. As such, it is more likely that employment

opportunities would be centred around providing an alternative employment offer, possibly enabling the redevelopment/reallocation of less attractive employment areas within Welwyn Garden City.

5.2.190 The Strategic Economic Development Advice received suggests that “if development of this scale were to be taken forward, consideration could be given for a modest employment land allocation as part of any residential-led scheme, which would in some way compensate for the difficulties in identifying a site for modern B1 development in a high visibility, high accessibility location in Hertford and Ware.”

5.2.191 **Investment barriers:** Employment development here would only be able to come forward as part of a wider mixed-use development scheme as there is no current infrastructure apart from the A414 and the B195.

5.2.192 **Prospects for employment:** Given these constraints it is unlikely that employment land development would be financially viable unless part of a mixed-use development. Given that there would be little interest in employment land in this location from major employers, it would be more risky in terms of securing the viability of a speculative development of smaller employment uses.

Key Points: East of Welwyn Garden City

5.2.193 Given the wide range of employment opportunities in Welwyn Garden City and neighbouring Hatfield and Stevenage, and more generally in the A1(M) corridor, new residents would have access to jobs, but would probably be very reliant on car transport to access these jobs, other than those in town centre locations, even if new employment land was allocated in this area of search. As such, additional traffic would probably be created on the A414 heading towards the A1(M) in the morning peak.

Harlow

5.2.194 Harlow is located close to the M11 and M25 and has two mainline rail stations. It has suffered decline in recent years and Harlow Council's Regeneration Strategy (2005) promotes large-scale growth to the north in order to attract private sector investment and skilled workers to the town. As explained in Chapter 4, a motorway was originally planned to the north and west of Harlow, providing easy access to the Pinnacles and Temple Fields Employment areas. However, the M11 was eventually routed to the east, resulting in relative isolation of these locations.

5.2.195 The South East Local Enterprise Partnership, working with Essex County Council and Harlow Council were successful in 2011 in securing designation of two sites totalling 51 ha (126 acres) as an Enterprise Zone. The successful designation of these two sites as an Enterprise Zone imply that

the development of these two sites are a priority for the Government and for Harlow Council. Essex County Council is investing in improving investment from the Growing Places Fund.

- 5.2.196** Harlow Council is seeking to establish the Enterprise Zone as a centre of excellence for healthcare and life sciences, capitalising on the cluster of major healthcare companies and organisations in west Essex, Hertfordshire and Cambridge. There are proposals for Anglia Ruskin University to establish a medical technology centre on the enterprise Zone. The focus on healthcare seeks to capitalise on the presence of GSK and BUPA Home Healthcare in the town.
- 5.2.197** The Enterprise Zone will clearly be the main focus of public sector intervention and support in bringing forward new land for development (the Nortel Campus) and regeneration of an existing industrial area (North East Templefields). It therefore seems probable that these areas will be the focus for private sector investment, notwithstanding the fact that there are other industrial areas in Harlow that require rejuvenation. Given the capacity of the existing EZ sites it is probable that Harlow will not be promoting other sites that will compete with the EZ.

Area of Search 62: North of Harlow - 10,000 dwellings

- 5.2.198 Local-area opportunities:** The main road access to the site is via the A414 west to the A10, and this limits the attractiveness of the location for strategic employment compared with other better-placed locations including Bishop's Stortford and Harlow. However, the scale of proposed residential development would be likely to create a substantial number of jobs in the local service sector.
- 5.2.199 Wider-area opportunities:** within Harlow, the new Enterprise Zone in Harlow is projected to result in a significant number of additional jobs, and these two sites (north-east Templefields North East and also at London Road - former Nortel Site - further south) would be likely to become a major focus. Pinnacles and Temple Fields are major employment areas. Further away, development north of Harlow would fall within the travel-to-work catchment of a number of employment opportunities by road (Hoddesdon and Cheshunt, North London, Hertford, Ware, and Welwyn Hatfield) and by railway (London, Cambridge, Stansted).
- 5.2.200 Investment barriers:** transport infrastructure is a major barrier to strategic employment north of Harlow. A northern link road connecting to a new junction on the M11 was discussed in the Harlow Infrastructure Study (2010), which suggested costs of £150 million for the road and £50 million for the junction. If such a road were provided, it may be that it could also provide access to the M11 from the Harlow Enterprise Zone at Templefields North-East. One or more additional road bridges across the River Stort could be needed in order to integrate development to the north with Harlow

and provide access for business needs north of the river. However, all these highways infrastructure projects will require transport modelling and consideration of feasibility and funding sources.

- 5.2.201** The Harlow Regeneration Strategy (2005) states that *"A persistent message throughout the analysis is the very poor image of the town and negative perceptions of Harlow as a location for business and living, particularly to outsiders. Although Harlow has been successful in attracting a share of inward investment in the East of England, the negative perceptions of the town as an investment location are related to the inadequacy of the road network and transport infrastructure set against modern requirements, congestion, outworn industrial estates, poor quality housing, relatively high levels of welfare dependency and the town's outdated design."* (page 13-14).
- 5.2.202** The Regeneration Strategy proposes 'transformational growth' to encourage investment not only in employment areas but also in terms of transport infrastructure and housing stock. According to the Regeneration Strategy, new 'aspirational' housing north of the Stort, as well as within the town, is crucial to making Harlow into an attractive place for people to live, work, and invest. It appears from the comments made by DTZ that there is some basis for this strategy in the long term, as residents of an urban extension becoming tired of commuting to the City and seek work more locally. However, the strategy may be complicated by the likelihood of development north of Harlow being seen and possibly promoted as part of East Herts rather than as Harlow.
- 5.2.203** It is also clear that the remoteness of the Pinnacles employment area from the M11 means that even large-scale transport investment such as a new Stort bridge west of the existing Eastwick Lodge/Burntmill bridge, coupled with an M11 northern link road, would unlikely to make it a more attractive location for investment.
- 5.2.204** **Prospects for employment:** As elsewhere, the general principle is that the prospects for employment areas are governed by proximity to the motorway network. The most viable location in Harlow would be to the east, possibly near a new junction on the M11. A business park at Area 62 would be unlikely to be financially viable even with the provision of a new northern link road to the M11, because there are other competing business parks which are more attractive due to closer proximity to the motorway network, including the Harlow Enterprise Zone and others further afield. However, service-based businesses associated with housing would be likely to be viable in this location.

Area of Search 69: Hunsdon Area - 5,000 dwellings

5.2.205 DTZ consultants suggested that a more 'freestanding' detached new settlement further north near Hunsdon would in be very similar to an urban extension to Harlow in terms of where residents would choose to work. In DTZs view significant numbers of new residents of a freestanding settlement would in practise travel into London from Harlow Town station, or commute to other parts of the sub-region from further afield, taking advantage of the A414 and A10. But this option would have rather less potential to contribute to the the regeneration of Harlow, compared to an urban extension located on the north side of the Stort Valley. The urban extension option would also on balance be better in terms of the objective to encourage the use of means of travel other than the car.

Key Points - Harlow

5.2.206 DTZ consultants have advised East Herts Council that most of the jobs growth and economic development opportunities to 2031 are likely to occur at the towns outside the district, which have a better access to the motorway network and a larger existing employment base, and are the main feature of travel to work patterns. Harlow falls into this category, and the Enterprise Zone may well provide work for some East Herts residents in future. At the same time, the creation of the Enterprise Zone within Harlow and the difficult access to the M11 mean that the area north of Harlow is unlikely to be attractive as a strategic employment location.

5.2.207 Development north of Harlow would therefore be largely residential in character, and attract new residents because of its location within East Herts rather than Harlow, especially given its good access to the City of London from Harlow Town station. This suggests that development to the north would present a very different image to that of Harlow now, and would be likely to have a different name. It may be that such changes could help to improve the image of Harlow, although as the Harlow Regeneration Strategy states, this would be 'necessary, but not sufficient' to ensure regeneration, and would need to form part of a wider package of measures to try to capture some of the benefits for growth for Harlow.

5.2.208 Given the general comments in the DTZ report about economic geographies, it seems unlikely that development north of Harlow would have a significant adverse impact on the economic vitality and well-being of either Harlow or the towns and villages of East Herts. As DTZ's report suggests, in economic terms housing growth is likely to have benefits for existing shops and businesses in both districts in terms of delivering more customers.

5.2.209 Finally, there appears to be little merit to a separate 'freestanding' new settlement north of Harlow from an economic development point of view, mainly because such a location would be remote from Harlow and associated transport links.

5.3 Urban Form

- 5.3.1** 'Urban form' refers to the structure and pattern of development. Urban form encompasses design considerations for strategic plan-making, as set out in national policy:

National Planning Policy Framework

Paragraph 56: The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Paragraph 61: Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

- 5.3.2** Coherent urban form is one of a number of contributory factors making up 'sense of place', and will therefore be an important consideration of area-specific visions in the next chapter. Urban form should also play an important role in promoting healthy communities with access to strong neighbourhood centres (NPPF Paragraphs 69-70). Whilst more detailed urban design considerations will be undertaken later in the District Plan process, including in Part 2: Allocations and Policies, it is appropriate to consider urban form in Chapter 5 in order to understand the broad design implications of development from a settlement-wide perspective.⁽⁴⁾
- 5.3.3** In terms of being able to assess urban form in a meaningful way through the District Plan strategy selection process, it is necessary to select key criteria which a) address the main strategic-level concerns of urban form; b) are established in national policy; and c) provide a framework for comparative assessment. Four areas have been identified which meet all three requirements and have been delivered as the basis for assessment of urban form as follows:
- **Landscape and Setting:** at the strategic level, the setting of a town or village, both in terms of its landscape context and its relationship to neighbouring settlements is crucial. It sets the context for the character of the built environment itself (see NPPF paragraphs 17 and 58)

⁴ Further guidance in respect of urban form is provided in two Government-backed design documents: Manual for Streets and Building for Life 12.

- **Structure and Connectivity:** integrating new development into the existing built form is crucial to achieving good design. New development should be a coherent and integral part of the settlement and make a positive contribution to its character (see NPPF paragraph 58).
- **Function and Capacity:** Urban form is also about the relationship of new development with the existing settlement in terms of the ability or capacity of the existing town or village centre to accommodate additional growth as well as opportunities for new development to complement existing local or neighbourhood centres, or provide new centres within the development (see NPPF paragraphs 38 and 70).
- **Open Space and Green Infrastructure (GI)** - in terms of urban form, GI can help to integrate development into neighbourhoods and provide clear limits to growth. Open spaces will often have a multi-functional role including formal and informal leisure, sport and recreation, provide habitat for wildlife as well as opportunities for horticulture. Provision of new open space can also help link-up with existing open spaces to create a network of green infrastructure which further strengthens urban form (see NPPF paragraphs 73 and 11).

5.3.4 Preliminary assessment of the function and capacity of development options has already been undertaken in Sieve 1 and Sieve 2. The Community Facilities topic assessment in Sieve 1 assessed against whether a) facilities were provided within the village or Built-Up Area of the town, b) there is potential for the area of search to provide some or all of the listed community facilities as part of the development. For consistency, a defined list of facilities was provided. In Sieve 2, consideration of town and neighbourhood centres as a potential 'anchor' for future growth was discussed. The assessment below combines the findings of both these assessments and places them in the context of urban form.

5.3.5 This section provides a high-level assessment of urban form. For the District Plan, further assessment of urban form is likely to underpin Part 2: Allocations and Policies. Detailed consideration of urban form such as provided in relation to planning applications (typically in Design and Access statements) is not necessary or proportionate to the requirements of strategic plan-making and requirements of the National Planning Policy Framework (NPPF).

Bishop's Stortford

5.3.6 Historically, Bishop's Stortford was formed by the river valley landscape. During the twentieth century, the town broke out of the river valley onto the surrounding plateaux. The urban form of the town has been shaped in recent years by the A1184/A120, and development in Thorley and St. Michael's Mead abuts the bypass. Bishop's Stortford is proposed for designation as a Principal Town Centre, and functions as a sub-regional centre, providing shopping, some employment, and leisure opportunities for villages and towns in Hertfordshire and in Essex.

5.3.7 The town is characterised by a number of attractive Green Wedges, along the Stort river corridor but also others including recreational space such as the Thorley Green Wedge, Hoggate's Wood/Ash Grove, and the playing fields associated with the schools to the west. The Roger Evans Masterplanning Study (2005) draws attention to the grid street pattern of the Victorian New Town and highlights the advantages of this urban form in terms of connectivity and legibility to the looping patterns of some newer parts of the town.

Area of Search 1: Built-Up Area - up to 1,233 dwellings

5.3.8 The initial scale assumption of 1,233 dwellings included 775 dwellings at the schools sites (London Road, Warwick Road, Beldams Lane, and Hadham Road). However, the secondary school capacity issue in Bishop's Stortford remains to be resolved and it may be that all these sites will need to be retained for educational purposes. This will require further investigation and any comments relating to the schools site below should be understood in this context.

5.3.9 **Landscape and Setting:** The Goods Yard presents a significant opportunity to enhance the riverfront whilst preserving the attractive area of woodland to the south of the site. The schools sites are situated within the urban fabric of the town and if developed, would appear to be capable of successful integration into the existing urban context with a good layout and design.

5.3.10 **Structure and Connectivity:** the Goods Yard presents a significant opportunity to enhance connectivity between the railway station and the town centre. In particular, the proposals to designate the town centre boundary to cover the northern half of the site provide an opportunity to significantly increase the vitality of the station area. The bridge at Station Road would need to be widened to provide safer and more attractive connection between the station and the town centre. Given careful attention to design and layout the schools sites could be well connected into the existing urban fabric.

- 5.3.11 Function and capacity:** The Goods Yard has significant potential to enhance the capacity of the town centre, providing a link between the station and the existing town centre, and also by enhancing the vitality and viability of the station area through an appropriate mixed-use scheme, probably involving retail and some small-scale office accommodation. The other sites within the Built-Up Area are probably too small and disconnected from other non-residential uses to significantly enhance the capacity of the town, although further work is needed to assess whether or what sort of role the Hadham Road site will play in terms of future educational provision.
- 5.3.12 Open Space and Green Infrastructure:** The Goods Yard links well with the Stort Valley corridor. The schools sites currently provide open space in the form of playing fields which would be lost if these areas were developed. The Hadham Road site provides informal rugby pitches and these would probably be lost with development of the site, either for an education facility or for residential development. The area of mature woodland to the south of the Hadham Road site appears to provide open access and should be preserved.

Area of Search 2: Bishop's Stortford North - up to 2,500 dwellings:

- 5.3.13 Landscape and Setting:** this large area falls into a number of distinct landscape areas. The areas are addressed here from west to east. There are views of the churches of All Saints (Hockerill) and St. Michael's from higher parts of the area, including from Dane O' Coys Road, which would need to be protected if the area were to be developed. The area to the west of Hoggate's Wood, part of the 'Hadham Plateau', is defined by large, relatively flat geometric fields. The Green Wedge containing Ash Grove and Hoggate's Wood is of high landscape character, containing mature mixed woodland and a distinctive valley landscape south of Dane O' Coys Road. Although the rural character of Dane O' Coys' Road could be preserved to a degree with sensitive layout and design, development would entail inevitable loss of the sense of remoteness. East of Hoggate's Wood is the valley landscape of the Bourne Brook tributary, which the Landscape Character Assessment states has 'urban fringe characteristics', and is 'cut off from stronger landscape features to the north' by the A120. Beyond the marked dip of Bourne Brook itself lies a relatively high area of plateau as far as Hazelend Road. The Stort Green Wedge lies immediately adjacent across Hazelend Road.
- 5.3.14 Structure and Connectivity:** the area is structured by a number of natural features, including the Bourne Brook and its tributary, the Green Wedge including Hoggate's Wood and Ash Grove, and a number of tree belts and hedgerows. It is also structured by a number of man-made features including Dane O' Coy's Road, the A120 to the north, and a number of north-south footpaths connecting with the town. Dane O'Coys Road itself would be likely to play an important role in the internal structure and

connectivity of any future development, although the narrow character of the road suggests that it would not be appropriate for private vehicular traffic. If development in this area were to go ahead, then the minor roads and tracks, especially Foxdells Lane, Whitehall Road, Whitehall Lane and Barrell's Down Road, would form important access routes for pedestrian and cycle connections, but could probably not cope with a substantial increase in vehicular traffic.

- 5.3.15 Function and Capacity:** development could be of sufficient scale to provide one or possibly two centres each hosting a range of local community facilities. Section 5.2 above suggests that it may be viable to include an employment allocation somewhere in this area. A large supermarket in this area is not considered appropriate because it would serve a much wider area than Bishop's Stortford and, although undoubtedly attractive to developers from a market perspective, would be likely to displace any meaningful new local community facilities and attract large amounts of additional traffic.
- 5.3.16 Open Space and Green Infrastructure:** Hoggate's Wood and the green wedge south of Dane O'Coys Road has good potential as strategic GI, supported at a smaller scale by the opportunities presented by the existing tree belts/hedgerows and Bourne Brook and its tributary. These latter features could also have an important sustainable drainage function.

Area of Search 3: Bishop's Stortford East - Sub-Area B: 150 dwellings:

- 5.3.17 Landscape and Setting:** the landscape is relatively flat between the town and the M11 in a location largely occupied by the Golf Course. The area short-listed for further assessment after Sieve 2 lies between the edge of the Golf Course and the existing urban area, and is characterised by an area of low-density shrubland of a type used by dog walkers.
- 5.3.18 Structure and Connectivity:** Dunmow Road provides the main access to the town, and was identified by the Roger Evans study as having potential for upgrading with better pedestrian and cycleways. Given that development of around 150 dwellings has been proposed following Sieve 2, relatively small scale, development in this location is likely to be of a similar nature to that at Manor Links adjacent, which may also provide secondary pedestrian and cycle access. The Golf Course could provide a clear boundary to the east.
- 5.3.19 Function and Capacity:** development would be unlikely to be of sufficient scale to support additional centres, and the nearest facilities would be in the town centre approximately 1km away along Dunmow Road.

5.3.20 Open Space and Green Infrastructure: open space is likely to be limited to possibly a play area as part of a possible new residential development, if this area is considered appropriate for future development. There is little other open space nearby, and the Golf Course is private and therefore not considered as open space or Green Infrastructure for this assessment.

Area of Search 4: Bishop's Stortford South - Sub-Area A: up to 800 dwellings:

5.3.21 The initial scale assumption of 800 dwellings allowed 15 hectares for provision of a new secondary school site to the north-east corner. However, the secondary school capacity issue in Bishop's Stortford remains to be resolved and it may be that solutions at other locations can be found. This will require further investigation and any comments relating to the schools site below should be understood in this context.

5.3.22 Landscape and Setting: the site slopes gently from north to south, and is characterised by open fields with a small area of woodland to the northern edge and St. James' Way (southern bypass) to the south and west. The site lies to the north-eastern part of the Thorley Uplands Landscape Character Area. There are views of Thorley Parish Church from the area. The Planning Inspector's Report in respect of the proposal for a Secondary School site to the north-east of the area makes a number of relevant comments in relation to landscape and setting.⁽⁵⁾

- Whilst the presence of the bypass does have some visual impact, much of the bypass cannot clearly be seen from within the appeal site itself, as it is lost within the wider landscape views (Paragraph 565)
- The schools proposal would result in a prominent and somewhat discordant feature in the surrounding landscape, characterised by a prevailing open, rural topography (Paragraph 574)
- Aircraft noise would not result in an unacceptable educational environment (Paragraph 559).

5.3.23 Whilst observing these landscape concerns put forward by East Herts Council itself in relation to the Schools Inquiry, caution must be exercised in applying these conclusions from a decision-taking (planning application) context and applying them to a plan-making context, in which the wider strategic context needs to be taken into account. The relative importance of the landscape in this location will need to be assessed as part of the balance of planning considerations for this area, for Bishop's Stortford, and for the district as a whole.

5.3.24 Structure and Connectivity: Friedburg and Villiers-Sur-Marne Avenues could provide connectivity with the Thorley Centre, and London Road provides access into the town. The area is clearly structured by the

surrounding roads on all sides. The Roger Evans Masterplanning Study noted the disorientating effect of the looping Thorley street layout and culs-de-sac to the north, but the area is sufficiently large to provide opportunities for well structured internal layout. The Hertfordshire Way long-distance footpath runs through the site east-west, and does not connect into the town but into the surrounding countryside. ⁽⁶⁾

- 5.3.25 Function and Capacity:** development could be of sufficient scale to provide some facilities, although probably not a full neighbourhood centre. Thorley shopping centre would provide access to a range of facilities approximately 1km to the north. Further work will be needed to ascertain whether the area could be suitable for some additional employment.
- 5.3.26 Open Space and Green Infrastructure:** Southern Country Park and the Stort corridor can provide supporting GI networks. Within the area of search, the stream to the south could provide a GI feature with a strong sustainable drainage function, and the wooded areas within the site should be preserved if this area were to be required for development. The open countryside is easily reached by means of Church Lane and a number of public rights of way beyond.

Key Points - Bishop's Stortford Urban Form

- 5.3.27** Development within the built-up area of Bishop's Stortford could provide positive opportunities for enhancement of the town's urban form, particularly at the Goods Yard. However, care must be taken to ensure that the educational needs of the town are met throughout the plan period to 2031, which may mean either protecting sites for educational use, providing new sites for educational use, or a mix of both approaches.
- 5.3.28** Development in Area of Search 2: North would have some negative landscape impacts, although the existing features have the potential to provide a coherent structure to development in this location, and the area is well located in terms of connectivity with the town. Development here could also serve to reinforce the town's capacity, perhaps with the provision of an employment area.
- 5.3.29** Development in Area of Search 3: East (Sub-Area B) would have limited impact on landscape or the structure of the town, although it would not be sufficiently large to add to the capacity of the town and would rely on connections to the town centre along Dunmow Road.
- 5.3.30** Area of Search 4: South (Sub-Area A) would be visually prominent given the sloping nature of the site, and has less potential for integration into the structure of the town than Area of Search 2, although it does lie within the obvious limits presented by St. James' Way.

⁶ In the context of the schools application, the Planning Inspector concluded that the harm to the Hertfordshire way from the proposed Schools scheme would be likely to be significant (Paragraph 586).

- 5.3.31** As with other areas assessed across the district, urban form considerations in Bishop's Stortford will need to be assessed as part of the overall balance of local and strategic considerations set out in the National Planning Policy Framework.

Buntingford

- 5.3.32** Buntingford sits astride the River Rib on the road from London to Cambridge, halfway between Ware to the south and Royston to the north, in the rural north of the district. The town is located in a rural landscape characterised by the narrow valley of the Rib nesting in elevated plateaus. The majority of the town is to the west of the river utilising the slighter flatter slopes of the valley, although these also then rise steeply into the landscape beyond. The environs of Buntingford are set by the historic buildings Corneybury and Layston Church to the north and east of the town, the former Sainsbury's Distribution Depot to the south, and the proximity of the village of Aspenden to the southwest. The A10 bypasses the town to the west cutting through the valley slopes. Although not a dominant feature in Buntingford as a whole, the river flows northeast to southwest through the town creating an important amenity, wildlife and environmental corridor that contributes significantly to the character of the locality, especially on its northern reaches.
- 5.3.33** Buntingford is defined by the staggered cross-roads at the market place where the east-west Baldock to Newport route bisects the north-south axis of the High Street / Ermine Street / London Road. Historically the town remained compact although significant expansion occurred in the second half of the 20th Century. This development is characterised by culs-de-sac supplemented by public footpaths which, despite creating an illegible built form, are nonetheless a feature of the town. On the whole, the character of many of the residential areas has not been diluted by redevelopment of individual plots, and as such, they still exhibit strong design coherence. Much of the town centre and historic areas of the town are covered by a Conservation Area, including with many listed buildings.
- 5.3.34** Sieve 2 explained that the town centre has a limited range of shops and facilities based on convenience shopping, and has been proposed for designation as a Minor Town Centre, along with Ware and Sawbridgeworth. For this reason it appears doubtful whether the town could successfully integrate development at the higher end of the growth range set out, although at lower levels some growth could reinforce the vitality and viability of the existing facilities and the High Street. Given the small size of the town new development would be likely to turn to the town centre for the provision of services and facilities. It seems unlikely that even at the higher levels of growth, new developments would be able to support new centres, although there may be some scope for the location of additional or expanded facilities in any new developments, based on assessment of the needs of the whole town.

5.3.35 The River Rib provides an important green infrastructure corridor that penetrates the town and this is accompanied by the areas of open space including the playing fields on Bowling Green Lane. Poor provision of accessible natural green space is an issue in Buntingford and as such, green infrastructure enhancement issues mainly relate to improvements to links such as along the river corridor and disused railway and integration of the hard southern edge of Buntingford. Enhanced hedgerow planting would be beneficial to the A10 bypass to improve the setting and approach to Buntingford in the landscape. The presence of parkland associated with Corneybury to the north of the town is another town-wide asset that could be exploited further for biodiversity and community benefit.

Area of Search 6: Buntingford South and West (Sub-Areas B and C (within bypass only)) - 620 dwellings

5.3.36 Landscape and Setting: This area of search is physically contained between the edge of the existing built-up area and the A10 bypass, which forms its southern and western boundary. The A10 forms a defensible edge to the westward development of Buntingford. Development could begin to compromise the setting of Aspenden which along with the neighbouring village of Westmill are regarded as the most distinctive features of the High Rib Valley landscape character area. The A10 bypass is locally intrusive in terms of noise and visual impact. Development west of the sewage works in Sub-area B would climb the valley slopes. Whilst it would be physically contained by the A10 bypass, the extent to which this forms an effective visual buffer to the landscape beyond is questionable. Development of the remainder of Sub-area B (to the north of the sewage works) would conserve and respect the valley setting. Although on high ground, development in Sub-area C respects the historical north-south axis of the town could also assist with improving the appearance of the town when arriving from the south.

5.3.37 Structure and Connectivity: In terms of connectivity, there is potential for access off existing estate roads including Lyunes Rise, Longmeads, and Olvega Drive as well as the main roads of Baldock Road, Aspenden Road and London Road. Along with integration of existing footpaths, these would help stitch development into the structure of the existing town. However, the long delineations of the boundaries to the Monks Walk and Lyunes Rise development would give the suggestion that development in this area of search could be seen as another estate appendage to the town rather than a coherent and integrated part of Buntingford.

5.3.38 Function and Capacity: Being adjacent to Watermill Industrial Estate, this area could provide additional land / employment opportunities. Development of some 620 dwellings would also warrant additional community facilities including open space.

5.3.39 Open Space and Green Infrastructure: This area of search provides the opportunity to both enhance existing green infrastructure and provide additional open space provision through the creation of a green wedge between Aspenden Road and the disused railway. Not only would this wedge strengthen the existing river corridor but by linking it to the disused railway would provide new links to natural green space. Open space in this location, would ensure separation between Buntingford and Aspenden but also effectively use land in the flood plain, perhaps even as including a new home for Buntingford Football Club.

Area of Search 7: Buntingford North (Sub-Area A only) - 500 dwellings

5.3.40 Landscape and Setting: Bounded by Ermine Street to the east and the A10 bypass to the west, the landscape and setting of this area is defined and characterised by Cornebury parkland, which is noted as being one of the most distinctive features of the High Rib landscape character area. Although the northern extremity of this area is some distance from the town centre, and development here represents an elongation of the town, it is within the valley setting that is the defining feature of Buntingford. As such, it would enhance local distinctiveness by ensuring that Buntingford is contained within its landscape context. Although the A10 bypass forms a boundary to development, in this location the A10 is relatively open (as opposed to the cutting to the south) and the extent to which this forms an effective visual buffer to the landscape beyond is questionable, especially since the land in this area begins to rise to the west and north.

5.3.41 Structure and Connectivity: In addition to connections onto Ermine Street, a key connection would be to the south onto Bowling Green Lane. Use should also be made of the stretch of former road to Throcking in order to fully integrate development into the existing structure of the locality. One feature of the existing built form of the High Street is similarly sized square 'blocks'. This pattern could be replicated northwards to further stitch development into the existing built form.

5.3.42 Function and Capacity: The area is immediately to the north of the Park Farm employment area and includes a proposed extension that has yet to be built. Given the relationship of this area at the top of the High Street, provision of employment or commercial uses here could compliment the existing town centre. Indeed, there are considered to be few alternative opportunities to increase the capacity of Buntingford town centre. The area is also adjacent to Freman College and could provide land such as playing fields to enable the school buildings to be expanded to meet education need in the town.

5.3.43 Open Space and Green Infrastructure: The playing fields of Freman College, Bowling Green Lane and Edwinstree Middle School form a key green wedge that penetrates the town from the north. Development of this area provides the opportunity to strengthen this wedge by delivering open space to the west.

Area of Search 8: Buntingford Northeast (Sub-Area B only) - 300 dwellings

5.3.44 Landscape and Setting: Bounded by The Causeway and Layston School to the north and Hare Street Road to the south, this area lies on the eastern slopes of the valley. The topography in this area forms a distinctive landscape 'bowl' which could 'contain' development within the valley setting. Development in this location would push the extent of the town eastwards beyond the current limits of the built form on Hare Street Road itself. Part of the Wyddial Plateau landscape character area, the upper slopes and ridge present an open and elevated landscape. The western boundary of the area is defined by the extent of the existing built-up area of Buntingford. The eastern edge is less well defined although a fairly recent tree/hedge belt has been planted which is slowly maturing to provide some definition. Further east, a public right of way skirts the ridge line although contains few if any vertical elements to act a physical barrier to development. It is therefore considered that the tree/hedge belt should be the maximum limit of any development.

5.3.45 Structure and Connectivity: The area is within 800m /10 minutes from the town centre. The obvious connections are to Hare Street Road to the south, although this alone would be insufficient to stitch the development into the town. An existing Public Right of Way runs diagonally northwest to southeast across the area: a course which is seemingly incongruous with the structure and layout of the town since the defining feature of Buntingford is its north-south axis sitting in the narrow valley of the Rib. This is strengthened by the linear nature of Sunny Hill, Archers and Paddock Road to the west. It is considered appropriate, therefore, to continue this structure by providing a new direct north-south route, acknowledging topography, connecting The Causeway with Hare Street Road. Doing so would of course involve a land swap with Layston School, whose axis would alter from east-west to the north of the site to north-south adjacent to the existing built form and effectively forming a buffer between existing and new development.

5.3.46 Function and Capacity: Given this areas relationship to the town centre, it is not considered that commercial development in this area would be appropriate. Notwithstanding this, the area is adjacent to Layston School to the north and allotments to the south and could provide additional land to meet future needs of both these facilities. Indeed, development of this area could enable expansion of Layston School to meet identified education

need in the town. The area is also close to Layston cemetery and anecdotal evidence suggests that additional burial space is also required. Again, land in this area could provide for additional capacity.

- 5.3.47 Open Space and Green Infrastructure:** The existing boundary of the town is considered quite ‘hard’ in landscape terms and there is considered to be little penetration of green infrastructure into the town from the east. Certainly, the realignment of Layston School and additional open space between the existing built-form and new development would embed green infrastructure into the built form. Enhancement of the existing tree / hedge belt could also contribute to a network of interconnected green routes.

Area of Search 9: Buntingford East - 500 dwellings

- 5.3.48 Landscape and Setting:** In Sieve 1, it was concluded that 20 hectares of this large area of search may be suitable for development: i.e. the area roughly bounded by Hare Street Road to the north, a recently planted curving tree belt to the east, the former Sainsbury’s Distribution Depot to the south, and the existing built form (Snells Mead, Layston Meadow, Plashes Drive, Owles Lane, London Road and Windmill Hill) to the west. Similarly to Area of Search 8 (above), this area forms the eastern valley slopes of the Rib rising up from the town to an open arable plateau. Development in this location would push the extent of the town eastwards beyond the current limits of the built form on Hare Street Road and the distribution depot which is cut into the landscape on its eastern side. Despite this, the depot is still a prominent and dominant feature in the landscape, due in part to its bulk but also the rising topography of this area, emphasising the fact that the tree belt which skirts the ridgeline may indeed be too far east to ensure that any development respects the valley setting of Buntingford.
- 5.3.49 Structure and Connectivity:** The area is just over 800m / 10 minutes from the town centre. The area could be well integrated to the existing built-up area using accesses to Hare Street Road, Snells Mead, Layston Gardens and Owles Lane. However, access onto Hare Street Road may contradict the topographical context of the area. The eastwards continuation of existing accesses would create the most coherent structure in addition to a north-south route mirroring London Road itself.
- 5.3.50 Function and Capacity:** Commercial development may be appropriate to the south as an extension to, and accessed from, the distribution depot. However, this site is currently proposed for redevelopment so it is considered unlikely that additional opportunities would arise. The area is bounded by playing fields and allotments to the north. Development in this area could provide an opportunity to create an additional large open space, particular for children’s play and recreation.

5.3.51 Open Space and Green Infrastructure: In addition to the open space referred to above, the eastward extension of accesses through the area could create green infrastructure routes that penetrate through into the town. Enhancement of the existing tree belt could also contribute to a network of interconnected green routes.

Conclusion - Buntingford Urban Form

5.3.52 The scale and design of new development are likely to be critical factors in the ability of the town to maintain coherent urban form. Development to the north (Area of Search 7) and to the south (in Area of Search 6: Sub-area C) would do most to respect the valley setting of the town. However, all areas offer opportunities for additional commercial and community facilities, which would strengthen the minor town and rural service centre role of Buntingford. Development to the north, south and west would have a very defensible and physical boundary limit in the A10, whilst to the east, limits are less tangible. However, in both directions to the east and west, development would begin to creep up the valley slopes diluting the historic north-south axis of the town. Whilst residential development in part of Area of Search 6: Sub-area B adjacent to Watermill Industrial estate would be appropriate in landscape and setting terms, this area would not be suitable for residential, not least because of the sewage works, but because the area would be poorly integrated to the existing built form.

5.3.53 In terms of urban form, growth at the lower end of the range of development options around 500 dwellings would be more appropriate, fulfilled by the partial development of areas in all directions, rather than the creation of a relatively large urban extension which, apart from being incongruous to the setting and context of Buntingford, may well unbalance the town in terms of urban form.

Hertford

5.3.54 Hertford lies towards the south of the district in rural surroundings at the confluence of four rivers (Beane, Lea, Mimram and Rib), and historically the town's shape was largely formed by this river valley setting. Hertford is further characterised by its Green Fingers, a series of green wedges which penetrate to the central core of the town. While the town centre is situated in a valley, the settlement has expanded over time to include areas, such as Bengeo, Morgans Walk, Sele Farm and Foxholes, which are all located at much higher levels. To the east of Hertford lies the neighbouring town of Ware, with the river, and later rail, connections between the two closely situated towns being key drivers in their development.

5.3.55 As the County Town, and situated on an old coaching route, Hertford's shape has been partly influenced by travel patterns relating to road, river and rail, although the town owes its relatively small size to the fact that it

has been bypassed by major routes. Whilst the A414 Gascoyne Way relief road has greatly improved the town centre environment, it has been to the detriment of the character of the town as a whole, which is bisected in two. Hertford's town centre retains much of its medieval core, and includes many buildings of historic significance, with a high proportion of them being listed buildings. This high townscape quality is reflected by its Conservation Area designation and much of the medieval street pattern remains. Outside the town centre, residential developments of varying ages and quality have emerged over time and these provide a range of accommodation options for residents. The area to the south of Gascoyne Way is predominantly residential with some employment activity, notably public service offices, but without the retail vibrancy of the central area.

5.3.56 Sieve 2 explained that Hertford provides some convenience and comparison shopping opportunities in its role as a Secondary Town Centre, although there are no identified opportunities for expansion of the town centre. This suggests that Hertford could 'anchor' some limited growth at urban extensions.

5.3.57 Hertford benefits from a number of green infrastructure assets including Hartham Common and the town's 'green fingers'. The rivers themselves act as green (or blue) corridors providing for an interconnected network. These along with Kings Meads to the east should be reinforced as strategic green infrastructure. The town also benefits from a number of historic parks in the vicinity including Balls Park, Goldings and Brickendonbury. Further afield, and of greater strategic importance is the presence of the Broxbourne Woods complex.

Area of Search 11: Hertford West - 600 dwellings:

5.3.58 **Landscape and Setting:** An extension to the Sele Farm area of Hertford on the plateau of the western slopes of the town. Bisected by the B1000, to the south Panshanger Parkland landscape character area slopes southwards to focus on the River Mimram. To the north, Bramfield Plain landscape character area slopes northwards to a tributary of the River Beane. There are no definitive physical boundaries to outward development although there are a number of small blocks of woodland that act as a definitive edge to development in this area and limit the westward extent of development. A sensitive location, this area forms a gateway to Hertford both from the south, but more importantly from the west along the B1000 and development here could improve the existing juxtaposition of the urban/rural fringe.

5.3.59 **Structure and Connectivity:** To the north of the B1000, existing development forms a hard edge although there is one opportunity (Perrett Gardens) for new development to stitch into the existing layout and structure. To the south, the B1000 and Thieves Lane form the threshold to the existing built form. Here opportunities should not be missed to create

a fully connected and legible structure and layout rather than succumb to the temptation of a car dominated layout creating an appendage to the town. An integrated approach would enable the development to make the most of existing public rights of way in the area and providing access to the surrounding countryside.

5.3.60 Function and Capacity: Although some distance from Hertford town centre, development in this area could complement the existing facilities in the locality including Sele School, Hollybush School, shops at Fleming Crescent, and Sele Community Centre. As an example, given the proximity to both Sele and Hollybush schools, should these schools need to expand this area could provide detached playing fields in order to provide for additional education capacity. Although significant commercial opportunities would be inappropriate, development of some 600 dwellings would warrant additional community facilities including open space.

5.3.61 Open Space and Green Infrastructure: The small blocks of woodland offer the best opportunity to embed open space and green infrastructure into the development, including by enhancing the existing rights of way to create a network of interconnected green routes. These in turn could lead to Panshanger Country Park: a strategic piece of green infrastructure between Hertford and Welwyn Garden City. Panshanger Country Park, ancient woodland and Archer's Spring should all be retained and enhanced with suitable protections as important strategic green infrastructure.

Area of Search 12: Hertford North (Sub-Area C only) - 100 dwellings:

5.3.62 Landscape and Setting: Sub-area C is on the high ground of Bengoe bisected by the B158 that splits the area in two on a north-south axis. To the east, the Lower Rib Valley landscape character area slopes northeastwards towards the River Rib in an open and undulating valley with the rising countryside beyond. To the west of the B158, the landscape of the Stoneyhills character area rises upwards, characterised by mineral workings. Sieve 1 concluded that 100 dwellings to the east of the B158 may be most appropriate in this area, although there are few physical features that would limit outward expansion of development. Development here could however, greatly improve the rather abrupt transition from urban to rural character. To the west of the B158, development would be in the 'v' created by the B158 and Sacombe Road, although again there are only minor field boundaries to contain development.

5.3.63 Structure and Connectivity: The main access to development in this area would be off Wadesmill Road (B158) although there are a number of opportunities to stitch development into the existing structure and layout of the locality including Temple Fields (to the east) and Sacombe Road (to the west) and the various public rights of way that traverse the area. Enhancement of existing routes would also encourage access to the surrounding countryside.

5.3.64 Function and Capacity: Although some distance from Hertford town centre, the area is close to a range of community facilities including Bengoe Primary School, and shops on both The Avenue and Bengoe Street further to the south. It is unlikely that this scale of development could provide a new centre with a full range of facilities, although town-wide assessment may indicate that some land here could provide for community facilities for wider use. Commercial uses in this area are not considered appropriate. There may also be opportunities to swap the existing allotments at the junction of Wadesmill Road and Sacombe Road for superior provision further to the north.

5.3.65 Open Space and Green Infrastructure: To the north the existing rights of way should be used to structure site-level green infrastructure, possibly with additional planting. Enhancement of existing rights of way could contribute to creating a network of interconnected green routes. Additional allotment land could provide the appropriate transition from urban development to rural countryside. There is also potential to provide additional and enhanced access to the River Rib pastures further to the east, although this may depend on the scale of development.

Area of Search 13: Hertford South (Sub-Area C only) - 100 dwellings:

5.3.66 Landscape and Setting: Bounded by London Road (B1197) to the east, Morgan's Walk to the west and bisected on a north-south axis by Mangrove Lane, this area can be characterised as a rural periphery of Hertford. Comprising the undulating Bayfordbury, Brickendonbury and Balls Parklands landscape character area, a central feature is the brook running through Brickendonbury Farm into Hertford. Part of this area also forms one of Hertford's Green Fingers, although arguably the broadest and least penetrating especially since it does not follow the course of a main river. Notwithstanding this, the landscape in this area has been, and continues to be, shaped by the presence of large country mansions and estates. There is no southern physical boundary to limit the southern extent of any development, although at the end of Sieve 1 it was concluded that only relatively small scale development (100 dwellings) may be appropriate.

5.3.67 Structure and Connectivity: The key route is Mangrove Lane, although this is more of a narrow byway as opposed to a country road. This would form the backbone to the layout and structure of any development as there are considered to be few other opportunities to stitch development into the existing structure of the town. The area is served by public rights of way and these should be enhanced. Whilst this area does form a southern gateway to the town, it is not a key route and any development should enhance the transition from urban Hertford to rural Hertfordshire. Perhaps uniquely to this area, is a lack of a defined edge to the town, either built form or road. This is mostly due to the presence of Simon Balle School and Balls Park and as such, the urban area bleeds into the countryside.

Thus, subject to the specific location of any development, there may be a certain amount of disconnect between new development and the existing built-up area. The town centre is approximately 1km to the north.

5.3.68 Function and Capacity: To the south development would be likely to be relatively small-scale and relate principally to the town centre, although it would be well located for access to the existing schools. There could be potential for development to enable expansion of existing schools and provide additional community open space. Additional commercial land would not be appropriate, especially given highway constraints.

5.3.69 Open Space and Green Infrastructure: To the south additional open space is likely to be needed to compensate for the possible loss of existing space including expansion of Simon Balle school. The brook to the south would be retained as a wider green infrastructure feature external to the development area. If new development is focused along Mangrove Lane, this would have the effect of splitting the Green Finger in two; however, this has already occurred to a large extent with Oak Grove, Mangrove Drive, and Ashbourne Gardens. The focus of the new 'western' finger could be the existing brook and Morgans Walk and the new 'eastern' finger Simon Balle School playing Fields and Balls Park. Although such an approach would be a fundamental change, it is considered that at the settlement-wide scale it would enhance the definition of the town in urban form terms.

Key Points - Hertford Urban Form

5.3.70 The relatively low levels of peripheral development tested could be accommodated without significant harm to the urban form of Hertford. To the west (Area of Search 11) there is an opportunity to strengthen the setting of the town through the creation of Panshanger Country Park strategic green infrastructure. To the north (Area of Search 12), development could help improve the relationship between the urban and rural, and to the south (Area of Search 13), whilst amending the current extent of the Green Finger, development could be accommodated without significant harm to the town. Unlike many other locations across the District, areas of search around Hertford are characterised by a lack of an existing physical barrier to act as a limit of growth. As such, limited development as proposed is considered appropriate.

Sawbridgeworth

5.3.71 Sawbridgeworth is located on the western slopes of the River Stort halfway between Harlow New Town to the south and Bishop's Stortford to the north. The River Stort runs to the east of the town, which along with the railway line, forms the boundary between Hertfordshire and Essex, and physically separates the village of Lower Sheering from Sawbridgeworth. Further to the south along the roads to Harlow and High Wych, is suburban sprawl which forms an awkward appendage to the town. Notwithstanding this

the land here forms a significantly important break separating and distinguishing the settlements of Harlow, Sawbridgeworth and High Wych. The position of the railway line adjacent to the River Stort has resulted in pockets of wetland between the two embankments which have since become valuable wildlife havens, one area of which is designated as a Site of Special Scientific Interest. Being located within a river valley, much of the built-up area of Sawbridgeworth is rising westwards with much of the landscape reflecting the gentle rises and falls of tributaries feeding the River Stort. The rich fluvial soil has been cultivated for agriculture with wide stretches of flat, open arable farmland surrounding the built-up area.

- 5.3.72** The town centre is located on an east-west axis to the east of London Road rather than the main north-south route (A1184), although the centre itself is not centred on the crossing of the river. In essence, the structure of Sawbridgeworth is defined by the crossroads of London Road and Station Road / West Road with development in all directions, although weighted towards the south. Much of the town centre is covered by a Conservation Area, with many listed buildings and a historic character. To the west of London Road is mainly post-war residential development of a suburban character. However, the trend towards culs-de-sac and single access estate roads during the 1980s and 1990s has resulted in a closed urban fringe, where the edge is delineated by back gardens rather than by roads. As such, there are few points where access could be gained through the current edge to create new estates that are well-connected with the existing built-up area.
- 5.3.73** Sieve 2 explained that the town centre has a limited range of shops and facilities based on convenience shopping, and has been proposed for designation as a Minor Town Centre, along with Ware and Buntingford. For this reason it appears doubtful whether the town could successfully integrate development at the higher end of the growth range set out, although at lower levels some growth could reinforce the vitality and viability of the existing facilities. Given the small size of the town, new development would be likely to turn to the town centre for the provision of available services and facilities.
- 5.3.74** The greatest green infrastructure asset in the locality is the River Stort and it's environs. However, the existing built-up area of the town acts as a barrier to connectivity with the river valley. Pishiobury Park and the Rivers Nursery Orchard are significant green infrastructure assets but their accessibility is limited. Opportunities should be taken should development occur to create links between new neighbourhoods and existing green infrastructure assets, or to create new assets that could be supportive and supplementary to the habitats and species that inhabit the Stort valley and the orchards.

Area of Search 16: Sawbridgeworth West (Sub-Area A – North of West Road)

- 5.3.75 Landscape and Setting:** The Thorley Uplands Landscape Character Area (number 85) which covers this area and Sawbridgeworth North Area of Search is extremely large and covers all the land between Sawbridgeworth and Bishop’s Stortford, including Spellbrook, and extending west towards Green Tye. The landscape is a gently rising slope with open arable farmland. Very large fields with no hedgerows are locally characteristic. The area is remote but not tranquil. The LCA states that this character area is a “most unusual area; elemental and simple and of a scale undreamed of in the cluttered south east of the county.” It is classified as ‘Conserve and Strengthen’ in the LCA and as such scored ‘red’ in the topic assessment.
- 5.3.76** The landscape areas surrounding the town are very large areas, the main distinguishing features of which are diluted the closer to the built-up area of the town they are. Despite this, given the changes in topography, the land immediately adjacent to the west of the built-up area of Sawbridgeworth and the A1184 is the most visible part of the landscape character area. A large scale development which would need to cover much of this eastward facing slope would therefore cover much of this visible landscape and as such would degrade the openness of the current uninterrupted extensive views out from the urban area. A smaller amount of development built close up to the existing built-up area north of West Road would be more suitable in terms of protecting the landscape from encroachment and preserving the openness of the majority of the eastward facing slopes of the Thorley Upland character area.
- 5.3.77 Structure and Connectivity:** There are clear opportunities to extend the urban fringe around Mandeville School using existing roads and potential new links from developments under construction. Should development occur to the north of West Road, there is the potential to make Mandeville and Leventhorpe Schools more integrated into new development, potentially opening up access to shared community facilities at each school.
- 5.3.78 Function and Capacity:** The option for large-scale growth to the west of the town would probably make the provision of a new centre viable, or would require at least one new local parade for convenience needs. However, given the proximity to Harlow and Bishop's Stortford, it is highly likely that many residents of a large-scale western urban extension would travel to these neighbouring centres instead of using the facilities in Sawbridgeworth town centre.
- 5.3.79 Open Space and Green Infrastructure:** The brook that runs through this area could be used to redefine and soften the edge of a new neighbourhood and act as a tool for opening up and encouraging access to the countryside to the west of the town. If the football ground was relocated to a new site on the outer edge of the built-up area, this could serve to redefine the edge of the urban area, and as it would be a less ‘urban’ feature, could act as a softer link to the wider countryside around the town.

Area of Search 16: Sawbridgeworth West (Sub-Area B - South of West Road) – part of 200 or 2,800 dwellings:

5.3.80 Landscape and Setting: The High Wych Slopes Landscape Character Area (number 84) runs to the south of LCA 85 and contains the village of High Wych and hamlet of Allen’s Green. The area is described as a “south-facing slope of mixed farming within a small irregular field pattern, usually ditched rather than hedged. An area of transition, showing increasing urban influence in the southern part.” This character area is considered more able to accommodate development than area 85 (above) as much of the landscape has already been harmed by historic extensions and ribbon development towards High Wych. The LCA report states that the change within this area from north to south provides a good indication of the effect of creeping urbanisation. At the end of Sieve 3, it was decided that development should be limited in this location to land north of The Crest, as development west of The Crest would be likely to result in the removal of the strategic gap between Sawbridgeworth town and High Wych village. In terms of the landscape character area, the impacts of historic encroachment would be exacerbated. This coalescence would also harm the Rivers Nursery Orchard, a Local Wildlife Site and area of significant local importance.

5.3.81 Structure and Connectivity: The current urban fringe around Chalks Farm (Coney Green) south of West Road is more constrained. The brook acts a defining boundary to the built-up area and new infrastructure such as link roads or footbridges would be needed to join existing estates with new developments. In order to ensure connectivity it would be unsuitable to create culs-de-sac. Grid formats are the most permeable urban forms, offering more opportunities to join existing and new neighbourhoods together and to enable movement through the estate. In terms of scale, it would be much harder to create connections with the existing built-up area if there was a larger scale of development. Depending upon the design of any new road bypassing the town, it may not be possible to create new access points, in which case any new developments would need to be accessed through the existing built-up areas, possibly leading to tensions between existing and new neighbourhoods.

5.3.82 Function and Capacity: The option for large-scale growth to the west of the town would probably make the provision of a new centre viable, or would require at least one new local parade for convenience needs. However, given the proximity to Harlow and Bishop’s Stortford, it is highly likely that many residents of a large-scale western urban extension would travel to these neighbouring centres instead of using the facilities in Sawbridgeworth town centre.

5.3.83 Open Space and Green Infrastructure: There is an existing small recreation ground on the southern side of West Road between the existing built-up area and the ribbon development of houses along West Road.

Should development occur south of West Road it would be important to ensure this recreation ground remains and this could be extended southwards along the brook to create a green corridor between the existing built-up area and the new neighbourhood. This could have the dual use of recreation and flood attenuation. A new footbridge link to Coney Green could serve to create a pedestrian link between existing and new roads.

Key Points - Sawbridgeworth Urban Form

5.3.84 Although large-scale development to the west of the town would be contained by a bypass, which would act as a physical edge to development, development of this scale would be likely to have serious adverse impact on the urban form of the town. The new neighbourhoods would be located at some distance from the town centre and would be likely to encourage travel away from the town even for convenience shopping as new local shopping parades may be required to support new neighbourhoods. One benefit would of course be a reduction in pollution and congestion in the town centre as through traffic is diverted along the bypass. However, these benefits do not necessarily outweigh the creation of an unsustainable extension to the town. Furthermore, the construction of a bypass is not solely dependent upon development to the west of the town and could come forward irrespectively. In contrast, relatively small-scale development to the west, in the vicinity of West Road, would reduce the risk of unsustainable patterns of development. A smaller level of development would be easier to fit alongside the existing built-up area, in terms of connections to existing infrastructure and the pattern of built form.

Ware

5.3.85 Ware sits astride the River Lea (River Lee Navigation) at the fording point of the highway between London and Cambridge. The river has been the focus of the town's historical development and the town grew as a centre for malting. The town centre is on the northern bank of the Lea as is the vast majority of the town as it climbs out of the valley; the roman road north running between two tributaries forming a y-shape. Suburban development in the second half of the 20th century is on the high valley tops to the north of the town, and there is also similar development on the southern slopes although this is far less extensive. The New River also runs through Ware and, like the river, is a defining characteristic of its setting, especially when approaching from the southeast and southwest.

5.3.86 The town centre is focused on the High Street, being of mediaeval plan characterised by Burgage Plots: long narrow plots of land running between the High Street and the river. As such, the town centre retains much of its medieval core, and includes many buildings of historic significance, with a high proportion of them being listed buildings. This high townscape quality is reflected by its Conservation Area designation and the remnants of the town's malting heritage can also be seen. Sieve 2 explained that the town

centre has a limited range of shops and facilities based on convenience shopping, and has been proposed for designation as a Minor Town Centre, along with Buntingford and Sawbridgeworth. Large-scale development has the potential to provide a local centre, akin to the shopping parades around the town and could also draw on the catchment from existing adjacent residential areas.

- 5.3.87** The greatest green infrastructure assets of the town are the River Lea and New River which act as a green (and blue) corridor through the town centre, connecting the floodplains of Kings Meads to the west with the open space of the Lee Valley Regional Park to the east. Two tributaries of the Lea also run southwards through the town.

Area of Search 19: Ware North - 200 or 1,700 dwellings

- 5.3.88** **Landscape and Setting:** To the east of Wadesmill Road, Sub-area B is part of the large Wareside - Braughing Uplands landscape character area which wraps around the north and east of the town. In this undulating plateau there is a sense of being high in the landscape and a key feature is the valley formed by the brook that runs southwest into the town down to the Lea. Sub-area A forms the triangle of land sandwiched between Wadesmill Road and the A10 bypass (the Nun's Triangle) being part of Poles Park / Hanbury Manor Registered Historic Park and Garden. Distinct from the agricultural landscape of Sub-area B, this parkland area is notable for its mature trees.
- 5.3.89** **Structure and Connectivity:** The existing built-up area immediately to the south of this area is characterised by suburban culs-de-sac that turn their back on the countryside to the north. A number of public rights of way cross the area. Opportunities to stitch any new development into the fabric of the existing town are limited to Wadesmill Road adjacent to Wodson Park leisure centre (to the west) and Fanhams Hall Road (to the east). The scale of development will be a huge determinant of how well development in this area connects to the existing built-up area, and large scale development would probably warrant a new east-west link across the area; although this should not necessarily be the focus of the structure at the expense of a fully integrated, permeable and legible layout. Irrespective of this, the area of search is some 1.5km from the town centre.
- 5.3.90** **Function and Capacity:** The scale of development will determine the level of facilities provided. A smaller-scale development in the High Oak Road area would only be able to provide limited facilities, and would look towards the town centre. A larger scale could provide a local centre similar to that at Kingsway. Development in this area could provide for additional recreation facilities at Wodson Park.

5.3.91 Open Space and Green Infrastructure: The land to the north (High Oak Road) is used for informal recreation (e.g. dog walking, annual firework display) and land off Fanhams Hall Road is used as playing fields. Any development would either need to retain land in this area or incorporate compensatory open space. Either way, the open space in this location would form a key green infrastructure asset and supplement the brook running from southwards as a local green infrastructure feature.

Area of Search 20: Ware East (Sub-area A only) - 1,300 dwellings

5.3.92 Landscape and Setting: Whilst also part of the Wareside - Braughing Uplands landscape character area, the east of Ware exhibits different characteristics to the north, being a more open and exposed landscape. Indeed, development in this location could breach the ridgeline currently separating the town of Ware from the valley of the Ash. The road from Wareside forms a gateway to the town from the rural east, although with the northeastern suburban estates sitting somewhat below the ridge, the town proper is not experienced until much lower in the valley near Widbury Gardens. Development in this area would need to respect the approach to Ware.

5.3.93 Structure and Connectivity: Although the suburban development forms a well-defined edge to the town, a number of routes punctuate the built form, including (north to south) Ash Road, Beacon Road, Elms Road and The Vineyard as well as access off Cozens Road and Widbury Hill itself. Existing public rights of way would form a useful structure to any development. Thus development in this location could stitch well into the existing fabric. Given the rectangular shape of the area of search, large-scale development would best be achieved as discrete blocks rather than as a single whole with a defined centre.

5.3.94 Function and Capacity: At the end of Sieve 2 it was concluded that east of Ware should only come forward alongside north of Ware. In terms of functionality, this area needs to be considered in those strategic terms. Notwithstanding this, development in this location does present local opportunities including provision of additional land to expand Priors Wood School and Beacon Road recreation ground.

5.3.95 Open Space and Green Infrastructure: The existing public rights of way that run on an east-west axis could be enhanced as green corridors that penetrate through the development into the town. A green infrastructure buffer could also be created along the outside edge of the development thus helping to resolve any issues in respect of setting. Such infrastructure could also link to the existing small blocks of woodland helping to strengthen them. Additional open space would also need to be provided.

Conclusion - Ware Urban Form

5.3.96 Development to the north and east of Ware would arguably be out of scale with the existing Minor Town Centre role of Ware, and in this there are similarities with large-scale development options west of Sawbridgeworth. Although at lower levels some growth could reinforce the vitality and viability of the existing facilities, like Sawbridgeworth, there would be some risk that residents would travel elsewhere for shopping and other purposes. In contrast with Sawbridgeworth, however, to the north and east of Ware there are no serious complications in terms of strategic gaps. In respect of large scale development to the north, there may be integration issues in respect of layout and connectivity, whilst to the east, visual landscape setting is an issue. It is considered that, although physically separate from Poles Park and Hanbury Manor, the remnant of the Historic Parkland at the Nun's Triangle is still coherent. Indeed, its greatest value would be as public parkland to meet the recreation and leisure requirement of any new residents housed in development to the north of Ware.

Villages

5.3.97 The initial scale assumption for the villages was 10%, and no specific directions of growth have been assumed. Given the detailed nature of urban forms considerations at each village it is considered that the most appropriate way to assess urban form is for further studies to be undertaken for each village, whether by the District Council as Part 2 of the District Plan, or by Parish Councils as part of a process of Neighbourhood Planning.

Welwyn Garden City

5.3.98 Welwyn Garden City was the second of the pioneering 'Garden Cities' and is generally acknowledged to be one of the more successful examples of a planned new settlement. In terms of function and capacity, it plays an important strategic role for the wider area, with a strong town centre offer, excellent access to main transport links including the mainline train station, and the A1(M), which may be accessed from the south and east via the A414. The A1(M) limits growth to the west.

Area of Search 61: East of Welwyn Garden City: Up to 2,000 dwellings:

5.3.99 **Landscape and setting:** the area of search is located within the Welwyn Fringes Landscape Character Area, and Panshanger Parkland Landscape Character Area is located on the opposite side of Panshanger Lane. It is currently used for arable cultivation. The area is largely flat, although there is a dip around Birchall Farm, where there is a large pond. It is largely screened from the wider area, and is not visible from the sensitive landscape of the Mimram Valley, which lies beyond the woodland to the north.

- 5.3.100 Structure and Connectivity:** the area of search is located immediately adjacent to the existing urban area of Welwyn Garden City. Existing features provide potential for a coherent urban structure, including the woodland blocks, hedgerows, Panshanger Lane and the potential new Country Park beyond, Moneyhole Park and Green Lane, and the A414 to the south-east. A public right of way crosses the area from Panshanger Lane in the east to Moneyhole Lane in the west. National Cycle Route 61 passes along the B195 (Blackfan Road/Birchall Lane) and this road would provide the main route into Welwyn Garden City by a range of different modes of transport.
- 5.3.101** It is understood that Welwyn Hatfield Borough Council does not favour development options to the south-east of the town, including the area across Birchall Lane because of concerns over contaminated land and the poor connectivity. However, Area of Search 61 does not rely on delivery of new development within Welwyn Hatfield for coherent structure and connectivity and this is not considered to be an obstacle to possible development of the land within East Herts District.
- 5.3.102 Function and capacity:** The area could be large enough to support some additional facilities, possibly a new primary or even secondary school site, and a Local or District centre. Given the location adjacent to the A414 with good access to the A1(M), there could be some potential for employment.
- 5.3.103 Open Space and Green Infrastructure:** Adjacent to the site area there are blocks of ancient woodland, including Blackthorn Wood, Henry Wood and Birchall Wood which would need to be protected as GI assets if development in this area were to come forward. On the opposite side of Panshanger Lane there are proposals for a new Country Park. Within the site there are two ponds at low points which could have GI potential. Moneyhole Park could provide accessible open space from parts of the area.

Key Points - Welwyn Garden City Urban Form

- 5.3.104** Development east of Welwyn Garden City could provide a coherent urban form. Key factors include the firm edges provided by the proposed Panshanger Country Park, the internal structure provided by the woodland blocks and Moneyhole Park, and the strengths of Welwyn Garden City in terms of its past and current function and capacity.

Harlow

- 5.3.105** Harlow was originally masterplanned by Sir Frederick Gibberd with attention paid to the layout of the town within the landscape. Harlow is structured by a number of distinct neighbourhoods divided by green wedges, some of which contain the main roads within the town. The green wedges have left an ambiguous legacy for the town. On the one hand, they are a

distinctive part of the form and structure of Harlow and provide substantial community benefits including extensive open space. On the other hand, the roads within the green wedges have led to a degree of severance between the neighbourhoods and key destinations such as the stations and the town centre, which discourages the movement of pedestrians and cyclists.

- 5.3.106** This section considers Area of Search 62: North of Harlow (10,000 dwellings) and Area of Search 69: Hunsdon Area (new settlement - 5,000 dwellings) together, because of the considerable overlap between the two geographical areas and also between the planning concepts of 'urban extension' and 'new settlement'.

Area of Search 62: North of Harlow: 10,000 dwellings

- 5.3.107** Area 62 comprises three separate sub-areas equating with relevant parts of the Landscape Character Areas as follows:

- Sub-Area A: Area 83 (Hunsdon Plateau)
- Sub-Area B: Area 81 (Stanstead and Pishiobury Parklands)
- Sub-Area C: Area 82 (River Stort)

Sub-Area A - share of 10,000 dwellings:

- 5.3.108** This sub-area is the northernmost of the three sub-areas. Development of Sub-Area A is considered as part of a larger development involving Sub-Area B to the south. The notion of a detached 'new settlement' in Sub-Area A alone is assessed under Area of Search 69: Hunsdon Area below.

- 5.3.109** **Landscape and Setting:** Sub-Area A lies 2-3km away from the edge of Harlow. The Landscape Character Assessment states that this area is characterised by *'large scale open arable farmland on a flat upland plateau, with smaller fields and woodland to the north west of Hunsdon'*. Key features of this area include Hunsdon Airfield, the visually intrusive high-voltage overhead power lines (pylons) and the woodland blocks to the north. Development in this area would in itself be unlikely to have significant impact on the setting of Harlow, but it would significantly impact the setting of Hunsdon and the open countryside. If large-scale development were to happen in this area, it would be likely that most of Hunsdon airfield would be required for development. Whatever approach to layout and design were proposed, the character of Hunsdon as a distinct village in an open landscape would be unavoidably and significantly impacted.

- 5.3.110** A number of studies and other documents have addressed the landscape north of Harlow. The Harlow Area Landscape and Environment Study (CBA, 2005) states the *'desirability of retaining the rural character of largely*

undeveloped/open countryside to the north of the Stort Valley, and avoiding an increased sense of urbanisation through erosion of the individual identity of rural settlements and their dispersed pattern within the landscape' (volume 2, page 10). This is clearly the concern of the STOP Harlow North proposal for Gilston Great Park (2006), which draws attention to the potential of the landscape for enhancement.

- 5.3.111** Based on the CBA study, the Harlow Options Appraisal (2010) applied red/amber/green 'traffic light ratings to landscape sensitivity in each direction around Harlow as part of a constraints-led approach. It concluded that there were very large areas of 'high sensitivity' landscape around Harlow, particularly to the south, west and the Stort Valley to the North. Areas of moderate landscape sensitivity included the area around Old Harlow to the east, land in Epping Forest District to the east of Harlow District, and the area in East Herts to the north of the Stort Valley. The area within Harlow District east of the town was assessed as 'low sensitivity'.
- 5.3.112** The Harlow Area Study (Matrix, 2005) notes that Sir Frederick Gibberd intended the railway line and the 'Hertfordshire Hills' to form a clear northern limit to growth and acknowledges the landscape to the north, but challenges the continued relevance of this limit, given wider growth pressures and Harlow's good access to London and the M25 as well as its regeneration needs.
- 5.3.113** **Structure and Connectivity:** There are three main concerns relating to structure and connectivity, which apply in both sub-areas A and B. These are firstly, the separation from Harlow caused by the Stort Valley, secondly, the discordant features of the overhead power lines running through the area, and thirdly, the structure in relation to the existing villages in close proximity. These are addressed in turn.
- 5.3.114** Firstly, the Stort Valley is over 1km wide, and is a sensitive valley landscape and for this reason development in most of Sub-Area C has already been ruled out. One of the key issues for development in Sub-Areas A and B is whether a) could become part of a single 'Harlow' with a coherent identity on both sides of the Stort valley, or whether b) the valley would sever new development from Harlow and therefore constitute a separate settlement with its own distinct identity, or whether c) the Stort is an insurmountable obstacle to a sustainable pattern of development.
- 5.3.115** Taking account of the planning requirements set out in the NPPF, the issue of structure and connectivity cannot be resolved conclusively without consideration of a number of wider issues, relating to the urban form of the existing villages in the area as well as understanding of the options for a coherent regeneration strategy for Harlow, and 'objectively assessed' pressures for growth and development.

- 5.3.116** Secondly, there is a high-voltage overhead power line running through the middle of Sub-Areas A and B. For health and safety reasons, regulations require a 'wayleave' of 400m on either side of such power lines (i.e 800m across). As an artificial straight line with no reference either to the existing town of Harlow nor to any natural features such as topography or watercourses, it is difficult to see how the power line could be convincingly integrated into GI or other landscape or open space networks. ⁽⁷⁾ For example, at Great Ashby north of Stevenage the limitations to coherent urban form resulting from a similar power line are clear, even though the wayleave is considerably narrower than current requirements (only 50m each side).
- 5.3.117** Thirdly, the impact on the existing context including the nearby villages needs to be considered. Failure to achieve coherent urban form would have significant negative impacts not only on the settlements in East Herts, but also on Harlow in its objective to attract high skilled workers to the town.
- 5.3.118** The villages of Eastwick and Gilston would be unavoidably surrounded by development. The outlying villages of Hunsdon, Widford and High Wych would all be slightly different in their relationship to any possible future development. Widford lies behind a number of woodland blocks which could provide a firm buffer to development in the north. However, there are no such obvious existing buffers to Hunsdon and High Wych, which both lie approximately on the edge of the maximum possible extent of development. If the principle of development to the north were to be agreed in the District Plan, there would be pressure to develop as much of this area as possible.
- 5.3.119** It is therefore necessary to consider whether the villages would be separated from new development by some form of landscape buffer, or whether they would be integrated into it. Sawbridgeworth lies close beyond High Wych, and therefore the case for a clear buffer is strong in Green Belt terms. ⁽⁸⁾ However, Hunsdon is an isolated village and therefore any buffer with new development nearby would be likely to come under greater pressure.
- 5.3.120** The above analysis of landscape and urban structure shows that the East of England Plan suggestion that the area could eventually accommodate up to 25,000 dwellings betrays a lack of understanding of the local context: the area north of Harlow is not a 'blank slate' for limitless growth.
- 5.3.121** Two design concepts for development in Sub-Areas A and B should be assessed in relation to the structure and connectivity concerns identified.

7 National Grid's publication on this topic makes clear the limitations of attempts to integrate power lines into successful urban form.
Green Belt, including its purpose in the protection of historic towns, will be assessed further in the section on Green Belt later in this chapter.

- 5.3.122** Firstly, if the current form of Harlow were to provide a template, development would be structured around Green Wedges dividing separate neighbourhoods. Under this concept, Hunsdon would probably be integrated into the enlarged Harlow in the same manner as Old Harlow is integrated into Harlow, although there could be some scope for a relatively narrow open space buffer east of Hunsdon as a 'green wedge'.
- 5.3.123** A second option could be for a number of connected 'villages', perhaps reflecting some of the features of Hunsdon, for example. As the village concept is not explicitly related to Harlow it could provide a more coherent 'stand-alone' form to incorporate an irregular (rather than linear) 'wayleave'. However, this would be likely to reduce the amount of land available for development in order to soften the linear edges through uneven set-back from the 400m line on both sides, and could be vulnerable to pressure to 'squeeze' development value from the land. This option could relate better to the existing villages in the area, although it would still significantly impact their character in terms of their countryside setting.
- 5.3.124** **Function and Capacity:** if Sub-Area A were to be developed it would be located towards the outer area of the development, and most retail and main functions would be likely to be built to the south in Sub-Area B. However, given the potential scale of development in this sub-area, it would be likely to contain one or more schools and possibly neighbourhood centres. However, as shown above, the area north of Harlow does not have limitless capacity in terms of area to expand. The area north of the Stort is isolated from the M11 and would therefore be dependent on the provision of a new M11 link road, if its function and capacity is to be extended beyond being primarily a residential area.
- 5.3.125** **Open Space and Green Infrastructure:** This Sub-Area contains a number of separate woodland blocks, including Marshland Wood, Queens' Wood, Battle Wood, Black Hut Wood and Maplecroft Wood. Sub-Area A contains the upper reaches of the tributaries flowing south to the river Stort. The streams and woodland blocks could form important structuring elements, perhaps in the manner of Todd Brook, Vicarage Wood and Netteswell Plantation within Harlow. It could be possible for development in this area to link together these features into coherent networks of Green Infrastructure, perhaps with the provision of a Country Park based around the woodland to the north.
- 5.3.126** Another consideration relates to the nature of a buffer with Hunsdon. Potentially such a buffer could provide open space and Green Infrastructure, although there are no streams or areas of designated habitats here which would be likely to form a basis for such a project. If large-scale development were to occur in Sub-Area A then it is likely that the majority of Hunsdon Airfield would be required for development, and therefore a buffer with Hunsdon would probably not be more than 100m

wide. The concept of an 800m wide stretch of Green Infrastructure along the line of the overhead power lines is unconvincing, as it would result in an artificial and intrusive feature within the urban form.

Sub-Area B - share of 10,000 dwellings:

- 5.3.127** This sub-area lies south of Sub-Area A, and the southern boundary lies along the A414 and High Wych Road/Redricks Lane.
- 5.3.128** **Landscape and Setting:** The Landscape Character Assessment states that this area is characterised by *'parkland and arable farmland on gently undulating south-facing slope interrupted by valleys of the Stort's tributaries. Cultural pattern overrides topographical change. An area of ancient settlements, dominated by the many parklands on the south-facing slopes above the Stort Valley'*. In relation to Gilston Park, the LCA notes that *"there are a number of veteran trees, although Gilston Park has some notable veteran trees and a lake, but has lost much of its grassland to the plough"*. Streams including Pole Hole Brook, Fiddler's Brook, Eastwick Brook, and Hunsdon Brook provide an important part of the landscape, and are also significant in terms of structure and Green Infrastructure (see below). The hedgerows in this area are important landscape features, particularly along the narrow lanes. Other notable features of this area include Golden Grove and Home Wood.
- 5.3.129** Much of the area slopes towards the Stort Valley to the south, and therefore development in large parts of the sub-area would be visible from Harlow. Development in this area would change the form of the town and its current landscape setting, although the Harlow Area Landscape and Environment study suggests that the impacts would probably be less severe than those south of Redricks Lane. Development north of High Wych Road, in the vicinity of Channoeks Farm and Sayes Park Farm, would not be visible from the Stort valley but would impact on the setting of High Wych.
- 5.3.130** The setting of the villages of Eastwick and Gilston would be unavoidably and significantly impacted by development in Sub-Area B. A landscape buffer with High Wych could be introduced. As discussed above, a development concept involving linked villages could have more potential to integrate the existing villages with new development. However, the open landscape setting of all three villages would be significantly changed.
- 5.3.131** **Structure and Connectivity:** Development in Sub-Area B would be linked to Harlow by means of the existing road bridge across the River Stort and the railway line, possibly supplemented by a new bridge immediately adjacent.⁽⁹⁾ The other discussions about two concepts of structure are the same as under Sub-Area A above. If a direct link road to a new junction on the M11 were provided, this would mean that north of Harlow would

become attractive to commuters as a residential location. This would further the impression that the development would not form a self-contained part of Harlow. It may be that in the long term residents would seek employment nearer to home, possibly in Harlow, as they tire of long commuting distances to work. To enhance this connectivity, frequent bus services into Harlow would be required.

5.3.132 Function and Capacity: The Harlow Regeneration Strategy's vision for growth would see Sub-Area B, particularly the area immediately north of the Burnt Mill Roundabout, playing a key role in the northwards shift of the centre of gravity in the town, linked to development at Harlow Town Station. However, the area is unlikely to host significant employment development, (see Section 5.2: Economic Development) and would probably be largely residential in character, supported by a District Centre and local centres, rather than major retail development, which could undermine Harlow Town Centre. Development north of Harlow could be of sufficient scale to provide a number of distinct neighbourhood centres within easy reach of new neighbourhoods.

5.3.133 Open Space and Green Infrastructure: The Stort Valley would become a central piece of Green Infrastructure, if large-scale development in Sub-Area B were to go ahead. However, it is debatable whether the valley would form a central 'green spine' to a single integrated Harlow, or whether it would divide Harlow from a separate development. If development north of Harlow is to go ahead, it would need to be of sufficient scale and sufficiently well connected to Harlow to be able to unite, rather than divide, the expanded town.

5.3.134 The streams running south into the river could also become important GI features within a development, possibly also providing a natural line for pedestrian routes south to Harlow Town station. These streams are known to be important habitats for a variety of flora and fauna. Gilston Park is located in the centre of the area promoted for development, but is separately owned to the remainder of the area north of Harlow and it is unclear whether the park could become an open-access Country Park serving development for the area. However, a right of way does pass through the parkland, from which there are views of the lake.

Sub-Area C - 270 dwellings at Terlings Park only

5.3.135 Sub-Area C covers the Stort valley south of Redricks Lane and the A414. The only location within Sub-Area C for further assessment for development is Terlings Park.

5.3.136 The remainder of Sub-Area C was mostly discounted at Sieve 1 for reasons relating to landscape, flood risk, and urban form, but is nevertheless of importance to discussion of Sub-Area B and therefore some observations are required here.

- 5.3.137 Landscape and Setting:** Terlings Park is currently occupied by disused buildings and therefore the additional impact of development here on landscape and setting would be small. However, Terlings Park is located in one of the most sensitive parts of the Stort Valley landscape so any development proposals would need to be sensitively designed and screened.
- 5.3.138** Development in Sub-Area B on the south facing slopes west of the Burnt Mill Roundabout is likely to be visible from the valley. This would result in a significant impact on the landscape of the valley, although this is arguably already compromised to varying degrees by the A414 dual carriageway, railway line, and overflying aircraft. Development on the slopes south of Redricks Lane has already been ruled out on landscape grounds.
- 5.3.139** Further work is needed to ascertain the need for new infrastructure, but the construction of new bridges could have a significant effect on the landscape quality of the valley. The strategic gap between Sawbridgeworth and Harlow is likely to be especially sensitive in this regard, and the implications of a bridge in this area for Green Belt purposes will require further assessment, if a bridge is shown to be necessary.
- 5.3.140 Structure and Connectivity:** Terlings Park is separated from Harlow by the River Stort and the railway line. There is a public right of way connecting indirectly with Harlow by means of footbridges across the railway and the river. Overall, it is not well connected to the town. If this option were to come forward it would form a separate 'stand-alone' development, rather than having a particular connection to Harlow.
- 5.3.141 Function and Capacity:** Terlings Park is currently a brownfield site, consisting of a number of large disused buildings. It is understood that this site has been extensively but unsuccessfully marketed for employment use, and therefore residential use is proposed. Given the relatively limited extent of the site it is unlikely that it would be able to support substantial new functions, and would be likely to rely on Harlow or other centres for most facilities. As mentioned above, it would therefore be essential that development in this area should be linked to Harlow by frequent bus service.
- 5.3.142 Open Space and Green Infrastructure:** Terlings Park is situated within the Stort Valley, which is acknowledged to be a major piece of strategic Green Infrastructure. Therefore any development at Terlings Park would need to be appropriately integrated into the wider context, including the provision of good access. Sub-Area C includes a number of wildlife habitats including Hunsdon Mead, Eastwick Mead, and Parndon Mead, as well as Harlow Marsh and Hollingson Meads. Effective drainage measures would be required to ensure that run-off from development in the area does not adversely impact these sites but instead matches existing greenfield runoff rates.

Area of Search 69: Hunsdon Area - 5,000 dwellings

- 5.3.143** The Hunsdon area 'new settlement' concept overlaps with the urban extension concept for development north of Harlow. Many of the considerations relevant to this area of search have already been addressed above. This section assesses the distinct concept of a new settlement in Sub-Area A, with no development in Sub-Area B., i.e. a 'detached' new settlement, with an undeveloped gap to the south before the Stort valley is reached.
- 5.3.144 Landscape and Setting:** Purely in landscape terms, it could be argued that a location 2-3 km north of Harlow would be less visible from Harlow and would have less impact on the quality of the Stort valley, although as already noted, there would be unavoidable impacts on the setting of Hunsdon.
- 5.3.145 Structure and Connectivity:** A detached new settlement would by definition have no immediate connection with Harlow in terms of urban form. New highways would need to be constructed to link with Harlow. There would be likely to be more connection with Hunsdon, although it would be likely that, given limitations on the available space, the new settlement would adjoin Hunsdon without either integrating it or, conversely, being separated from it to achieve a distinct identity.
- 5.3.146 Function and Capacity:** There is insufficient land available for a detached new settlement to provide a full range of functions necessary to meet high levels of self-containment and sustainability. The only clear location for a detached new settlement would be in the area north-west of the end of Eastwick Hall Lane, south of Blackhut Wood and east of Hunsdon, including the whole area of Hunsdon Airfield. The maximum extent of this area is 150 hectares, which at 20 dwellings per hectare suggests a maximum 3,000 dwellings, including the full range of supporting infrastructure necessary for a new settlement.⁽¹⁰⁾ In addition, a detached location lacks the advantages of development options further south, such as access to railway stations, roads, and the facilities of Harlow.
- 5.3.147 Open Space and Green Infrastructure:** A detached new settlement would be surrounded by open countryside. To the north lie the woodland blocks noted above. To the east lies the row of pylons as discussed above, which could provide scope for some GI features within the 'wayleave'. The area to the south could be managed as a Country Park or other open space feature.

Key Points - Harlow Urban Form

¹⁰ By comparison, the built-up area of Sawbridgeworth is approximately 170 hectares (not including Pishiobury Park) and has around 3,100 dwellings.

- 5.3.148** Development to the east of Harlow would be preferable in terms of its landscape and urban form impacts. The visual impact on the Stort valley of development to the north could be reduced by avoiding development on the High Wych slopes and in the valley itself. Development west of the A414/Burnt Mill Roundabout would be visually intrusive within the valley. The open landscape to the north, which provides the setting for a number of villages, would be radically changed whatever layout and design concept is applied to new development in this area. Whether development should occur to the north will depend on the overall balance of planning considerations as set out in the National Planning Policy Framework.
- 5.3.149** The concept of a 'detached' new settlement makes little sense because it would not be able to achieve the necessary capacity, and would therefore be dependent on Harlow but separate from it. This would be likely be inefficient in planning terms, and would fail to make use of existing infrastructure further south.
- 5.3.150** Development at Sub-Areas A and B would be more likely to form a separate settlement with its own identity, rather than an integrated part of Harlow. This is partly due to the width of the Stort Valley, but also the requirement for a wayleave around the row of pylons, which would not be compatible with an extension of Gibberd's Green wedges northwards. This would suggest that alternative development proposals such as linked new villages would be more appropriate, although again, this concept would suggest a separate settlement, rather than an urban extension integrated with Harlow. Ultimately whether development north of the Stort could function as part of Harlow may be more a matter of the lifestyle choices and travel patterns of the residents of new development rather than of planning and urban form.
- 5.3.151** In terms of urban form, development at Terlings Park would not form part of any existing settlement, although it would provide good access to Harlow Town Station for access to London and other destinations, as well as to Harlow itself. Development at Terlings Park would need to be carefully designed to ensure that it takes account of its sensitive landscape context within the Stort valley.

5.4 Schools

- 5.4.1** This section will be completed for presentation to Members in February 2013 following further work with Hertfordshire County Council to agree locations where there may be a reasonable prospect of providing additional educational capacity to support new development.

5.5 Highways

- 5.5.1** This section to be completed for presentation to Members in February 2013 following results of transport modelling from the Harlow Stansted Gateway Transport Model (HSGTM) from Essex County Council and further highways feasibility and delivery assessment from Hertfordshire County Council.

5.6 Habitats

- 5.6.1** This section to be completed and presented to Members in February 2013 following receipt of transport data from the HSGTM.

5.7 Green Belt Review

- 5.7.1** This section to be completed and presented to Members in February 2013.

5.8 Delivery

- 5.8.1** This section to be completed and presented to Members in February 2013, following further clarification of infrastructure matters and collation of information from landowner/developer questionnaires.

5.9 Conclusions

- 5.9.1** This section will draw together the significant findings from the assessments and differentiate between the remaining areas of search to further refine the short-list of options.

