



**MEETING** : DISTRICT PLANNING EXECUTIVE PANEL  
**VENUE** : COUNCIL CHAMBER, WALLFIELDS, HERTFORD  
**DATE** : THURSDAY 3 OCTOBER 2013  
**TIME** : 7.00 PM

**MEMBERS OF THE PANEL**

Councillors M Carver (Chairman), L Haysey and S Rutland-Barsby

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

Members are requested to retain their copy of the agenda and bring it to the relevant Executive and Council meetings.

**CONTACT OFFICER: Martin Ibrahim**  
**Tel: 01279-502173**  
**Email: [martin.ibrahim@eastherts.gov.uk](mailto:martin.ibrahim@eastherts.gov.uk)**

## 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. Chairman's Announcements

3. Minutes (Pages 5 - 12)

*To approve the Minutes of the meeting of the Panel held on 25 July 2013.*

4. Declarations of Interests

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

5. Retail and Town Centres Study Update Report (September 2013) (Pages 13 - 22)

6. Strategic Housing Market Assessment Update 2012 (March 2013): London Commuter Belt East Sub-Region (Pages 23 - 30)

7. District-Wide Green Belt Review Part 1 (2013) (Pages 31 - 80)

8. District Plan – Update Report (Pages 81 - 176)

9. Developer/Landowner Questionnaires and ATLAS Meetings (Pages 177 - 200)

10. 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.*

11. Date of Next Meetings

*18 November and 3 December 2013, both at 7.00 pm, in the Council Chamber, Wallfields, Hertford.*

MINUTES OF A MEETING OF THE  
DISTRICT PLANNING EXECUTIVE PANEL  
HELD IN THE COUNCIL CHAMBER,  
WALLFIELDS, HERTFORD ON THURSDAY  
25 JULY 2013, AT 7.00 PM

---

PRESENT: Councillor M Carver (Chairman)  
Councillors L Haysey and S Rutland-Barsby.

ALSO PRESENT:

Councillors W Ashley, R Beeching,  
A Jackson, J Jones, M McMullen, T Page,  
M Pope, J Ranger, J Thornton and  
G Williamson.

OFFICERS IN ATTENDANCE:

Martin Ibrahim	- Democratic Services Team Leader
Kay Mead	- Senior Planning Officer
Martin Paine	- Senior Planning Officer
Jenny Pierce	- Senior Planning Officer
Claire Sime	- Planning Policy Team Leader
Katie Simpson	- Assistant Planning Officer
Brendan Starkey	- Assistant Planning Officer
Kevin Steptoe	- Head of Planning and Building Control Services
Bryan Thomsett	- Planning Policy Manager

## 1 CHAIRMAN'S ANNOUNCEMENTS

The Panel Chairman welcomed the press, public and Members and reminded them that the meeting was being webcast. He also welcomed Councillor S Rutland-Barsby to her first meeting as a Panel Member and Brendan Starkey, a new addition to the Planning Policy team.

The Chairman reminded Members of the training day that had been arranged in conjunction with the Planning Advisory Service, for 24 October 2013. This would be a very important session and all Members were urged to attend. He also referred to a meeting with the East Herts Association of Parish and Town Councils on 20 September 2013.

Finally, the Chairman commented that the informal group continued to look at emerging policies and reminded Members of the process, namely that, all proposals would be submitted to Council for decision, via the Executive and this Panel.

## 2 MINUTES

RESOLVED – that the Minutes of the Panel meeting held on 21 February 2013, be approved as a correct record and signed by the Chairman.

## 3 DECLARATIONS OF INTERESTS

In respect of Minute 8 – Strategic Land Availability Assessment (SLAA) – Round 3 – Update, the Panel Chairman declared a disclosable pecuniary interest in that he was Chairman of Hertford Regional College and would leave the room in the event of there being any substantial discussion of specific sites.

## 4 **STATEMENT OF COMMUNITY INVOLVEMENT (SCI): PROPOSED ADOPTION OF DOCUMENT FOLLOWING PUBLIC CONSULTATION**

**The Executive Member for Strategic Planning and Transport submitted a report detailing the results of the**

**Council's public consultation on its Draft Statement of Community Involvement (SCI), which sought agreement to adopt a revised document.**

**The Panel noted that 23 responses had been received from 20 respondents in relation to the consultation. The matters raised in these submissions were detailed in the schedule attached to the report submitted at Essential Reference Paper 'B'. This included summaries of the main issues raised, the Officer responses to those issues, and proposed amendments to the SCI, where appropriate. Several representations had suggested amendments that would add value to the SCI either in terms of factual content or for clarification of the proposed text. For these cases, proposed amendments to the document had been suggested in the schedule. Additional to the issues raised during the consultation, one further suggested amendment was also made to the SCI document for consistency reasons.**

**The Panel recommended the proposed changes and the adoption of the SCI as now submitted.**

**RECOMMENDED – that (A) the responses to the public consultation be noted and the Officer responses and proposed changes to the Draft East Herts Statement of Community Involvement be supported; and**

**(B) the East Herts Statement of Community Involvement, 2013 be supported for adoption.**

## **5 DISTRICT PLAN - UPDATE REPORT**

**The Panel considered a report setting out the progress made towards finalisation of a development strategy for the District. Approval was sought towards consolidation of the two-part plan into a single District Plan, which provided for an early review of the plan to address long-term planning requirements. An updated stepped approach was set out at Essential Reference 'B' of the**

report submitted.

The Panel also noted that there was an important gap in the Council's knowledge relating to infrastructure delivery considerations, notably in respect of the scope of evidence that might be required as part of the plan-making process, and the robustness of information that had to date been made available to the Council.

Therefore, Officers had requested support from the Advisory Team for Large Applications (ATLAS), an independent advisory service available to support local authorities in dealing with complex and large scale development projects.

The Panel noted that, subject to unforeseen circumstances, it would be possible to present a draft District Plan to Members later this year, with consultation later this year/early next year.

Officers referred to paragraph 2.31 of the report submitted and asked the Panel to note an error, in that Uttlesford District Council were currently considering an application for 850 dwellings at Elsenham, and the matter was not subject to an appeal.

In response to various Members' comments and questions, Officers advised that further guidance from the Government on the interpretation of the Duty to Co-operate was expected imminently. In respect of infrastructure issues, the Panel was referred to ongoing correspondence with strategic partners as detailed in the report submitted. Overall, the Authority was well placed to deliver a robust and evidence-based Plan.

The Panel supported the recommendations now detailed.

**RECOMMENDED** – that (A) a change to the structure of the District Plan, to combine Strategic Policies, Development Management Policies, and Site Allocations, into a single District Plan, be supported;



(B) an early review of the District Plan, based on a 'plan-monitor-and-manage' approach particularly in respect of long-term planning, be supported; and

(C) the approach to obtaining critical delivery information, including ATLAS project support, be supported.

## 6 DUTY TO CO-OPERATE – UPDATE REPORT

The Panel received a report summarising relevant information related to the Duty to Co-Operate involving each of the seven adjoining Local Planning Authorities. The report also sought endorsement of the Hertfordshire Infrastructure and Planning Partnership's Memorandum of Understanding, as detailed in the report submitted.

The Panel noted an error at paragraph 2.23 of the report submitted, in that Uttlesford District Council was currently considering an application for 850 dwellings at Elsenham and the matter was not subject of an appeal. Also the application had been submitted by Fairfield Partnership and not Fairview Homes.

The Panel supported the recommendations as now detailed.

**RECOMMENDED** – that (A) the current main issues relating to the Duty to Co-Operate involving adjoining authorities, be noted; and

(B) the Hertfordshire Infrastructure and Planning Partnership Memorandum of Understanding, be supported for use in planning policy and development management work.

## 7 POPULATION AND HOUSEHOLD PROJECTIONS – UPDATE REPORT

The Executive Member for Strategic Planning and

Transport submitted a report updating Members on aspects of population and household projections. Recently published and emerging information, together with the ongoing interpretation by the Planning Inspectorate of 'objectively assessed housing need' in the context of the National Planning Policy Framework (NPPF), continued to indicate that East Herts Council might need to plan for the upper end of the range 10,000 to 17,000 dwellings over the 20 year period 2011 to 2031.

The Panel supported the recommendation now detailed.

**RECOMMENDED** – that it be noted that recently published and emerging information, together with the ongoing interpretation by the Planning Inspectorate of 'objectively assessed housing need' in the context of the National Planning Policy Framework (NPPF), continues to indicate that East Herts Council may need to plan for the upper end of the range 10,000 to 17,000 dwellings over the 20 year period 2011 to 2031.

## 8 **STRATEGIC LAND AVAILABILITY ASSESSMENT (SLAA) – ROUND 3 – UPDATE REPORT**

---

The Panel considered a report which updated Members on the status of Round 3 of the Strategic Land Availability Assessment (SLAA) and to provide an interim list of sites identified to date that will be considered for assessment in Round 3.

Officers advised that, for clarification purposes, site 20/010 in both Essential Reference Papers 'B' and 'C' had been renamed to 'Land to the north of the Turkey Farm Recreation Area'.

In response to Members' questions and comments, Officers reminded the Panel of the Call for Sites process and suggested that updates to the list could be reported as a regular item to the meetings with the East Herts Association of Parish and Town Councils.

The Panel supported the recommendations now detailed.

**RECOMMENDED** – that (A) the list of identified sites, contained as Essential Reference Paper ‘B’ to the report submitted, which includes responses received to the Call for Sites, be noted and taken into account as part of the preparation of Round 3 of the East Herts Strategic Land Availability Assessment (SLAA); and

(B) any future Call for Sites suggestions be included and assessed as part of the preparation of Round 3 of the SLAA, and subsequently as part of the annual monitoring and review of the SLAA.

9 **TOWN WIDE EMPLOYMENT STUDY FOR BISHOP’S STORTFORD (JUNE 2013)**

The Panel received a report summarising the findings of the Employment Study undertaken for Bishop’s Stortford by Wessex Economics, which sought endorsement to use the Study to inform the preparation of the East Herts District Plan.

The Panel supported the recommendation now detailed.

**RECOMMENDED** – that the Town Wide Employment Study of Bishop’s Stortford, June 2013, be supported as part of the evidence base to inform and support the East Herts District Plan and for Development Management purposes in the determination of planning applications.

The meeting closed at 7.53 pm

Chairman	.....
Date	.....

This page is intentionally left blank

## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 3 OCTOBER 2013

#### REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

#### RETAIL AND TOWN CENTRES STUDY UPDATE REPORT (SEPTEMBER 2013)

WARD(S) AFFECTED: ALL

#### **Purpose/Summary of Report**

- This report summarises the findings of the East Herts Retail and Town Centres Study Update, September 2013, and seeks endorsement to use the Study to inform the preparation of the East Herts District Plan.

#### **RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:**

<b>(A)</b>	<b>The East Herts Retail and Town Centres Study Update Report, September 2013, be supported as part of the evidence base to inform and support the East Herts District Plan and for Development Management purposes in the determination of planning applications.</b>
------------	--

#### **RECOMMENDATIONS FOR COUNCIL: That:**

<b>(A)</b>	<b>The East Herts Retail and Town Centres Study Update Report, September 2013, be agreed as part of the evidence base to inform and support the East Herts District Plan and for Development Management purposes in the determination of planning applications.</b>
------------	---

#### 1.0 Background

- 1.1 In 2008, the Council commissioned Chase and Partners Consultants to undertake a Retail and Town Centres Study to audit the amount and type of retail across the district and to provide recommendations for an approach to planning for retail needs for the emerging Plan period. However, this Study was undertaken just before the UK went into economic recession and

used a 2006 baseline when undertaking forecast calculations. As such, it no longer reflects the latest economic situation. The 2013 Update Study, prepared by consultants Nathaniel Lichfield and Partners, the subject of this report provides an updated assessment of the current economic circumstances, uses up-to-date baseline and expenditure evidence from which to provide more accurate forecasts. The purpose of the Study is threefold:

- To assess changes in circumstances and shopping patterns since the previous study was undertaken;
- To assess the future need and (residual) capacity for retail floorspace distributed by town centre for the period up to 2031;
- To undertake health check assessments of the district's retail centres and audit of local shopping centres/parades.

1.2 Similar to other updated technical reports undertaken in the last two years, the Study provides strategic retail advice which considers among other things, the role the retail sector and town centres play in terms of job creation, the relationship between planned residential growth and the ability of town centres to accommodate growing and changing retail needs.

1.3 The study compares the existing and future needs of the District for convenience and comparison shopping. Convenience shopping is the provision of everyday essential items including food, drink, newspapers and confectionary for example. Comparison shopping is the provision of items not obtained on a frequent basis. These include clothing, footwear and recreational goods for example.

1.4 A representative of Nathaniel Lichfield and Partners will attend the Panel meeting and present the Update Study and be available to answer questions.

## 2.0 Report

2.1 Chapter 1 introduces the purpose of the Study and establishes the study area. Chapter 2 looks at the relationship between the towns in East Herts and surrounding centres, at current trends in the retail sector and how these trends affect the particular geography of East Herts. Chapter 3 takes current expenditure levels and makes forecasts based on assumed population increases, spending patterns and economic recovery rates. From these forecasts the study calculates how much floor space could be needed throughout the Plan period for convenience and

comparison goods.

- 2.2 The capacity figures suggest existing commitments are sufficient to meet growth up to and beyond 2016, but after 2021 there would be a medium term requirement for additional convenience goods floor space of 1,561 sq.m net (2,230 sq.m gross) primarily concentrated in Bishop's Stortford, and in the longer term surplus expenditure could support 7,620 sq.m net (10,886 sq.m gross). For comparison, the largest supermarket in the District is Sainsbury's in Jackson Square, Bishop's Stortford, which has 3,050 sq.m (net) of convenience floorspace (of a total sales floorspace of 3,813 sq.m net).
- 2.3 The capacity figures also suggest that for comparison goods, because the retention level is relatively low for East Herts, combined with the economic recession and the existing commitments (such as the Old River Lane development), there is actually an expenditure deficit up to 2021. By 2031, however, future expenditure growth is predicted to create an expenditure surplus of £42.20 million, translating in a demand for an additional 6,122 sq.m net (8,162 sq.m gross) of comparison goods floor space. For comparison, the Wicks in Madford Retail Park, Hertford is 3,755 sq.m (gross).
- 2.4 The previous 2008 Retail Study predicted a demand for 2,612 sq.m net (4,353 sq.m gross) convenience floor space, and 52,009 sq.m net (74,298 sq.m gross) of comparison floor space between 2008 and 2021. The figure for 2031 within this Study update is significantly lower because of the effects of the recession on expenditure growth between 2008 and 2013, and the lower future growth forecasts (i.e. 2.9% growth per annum rather than 4.8% growth) and the expected implementation of commitments.
- 2.5 As the 2008 Study explained, in the retail sector, standing still is akin to decline, and there are issues within East Herts' retail offer that would inhibit its ability to capture future retail expenditure. Existing centres are constrained leaving deficiencies or 'gaps' in provision – no large department store is often cited as one reason – a lack of consumer choice and competition leading to over-trading and congestion in existing larger stores (compared to company benchmarks). There are also location-specific needs such as in deprived areas and underserved markets.
- 2.6 An expansion upon the 2008 Study is the Commercial Leisure Assessment detailed in Chapter 4 of the Study. The district's supply of cinemas, tenpin bowling, bingo, nightclubs, private

health and fitness clubs, restaurants and cafés, pubs and bars are considered.

- 2.7 Whilst there is no quantitative need for new cinema or theatre provision (partly due to the proximity to larger centres, including London) qualitative improvements could be sought to increase retention. There is a current over-supply of private health and fitness clubs, though an increased population growth will support one or two new health and fitness clubs by 2031. There is limited potential for further tenpin bowling provision, particularly if growth in neighbouring larger centres results in competition for facilities within the District. There are no bingo facilities within the district, but the study area could support two bingo facilities by 2031. However, existing provision in neighbouring centres reduces the need to plan for new bingo facilities.
- 2.8 Food and drink establishments support retail and leisure uses and are important services within town centres. Compared to A1 retail uses, which have seen a decrease nationally, the proportion of A3, A4 and A5 Uses (restaurants, pubs and hot food takeaways) has increased over the last decade. This pattern has been repeated in East Herts' town centres. The Study suggests that in some centres the proportion of A3/A5 uses is relatively low and an increase of 20% of projected floor space could be required for these uses. As a result, the study recommends a flexible approach towards uses that would complement the retail offer of existing centres.
- 2.9 Chapter 5 of the Study considers the floor space projections from the previous chapters and analyses them with a view to advising on a strategy to accommodate any forecast growth. The Study considers the potential implications of the emerging development strategy. The Study acknowledges that projections up to 2021 are realistic but longer term projections (up to 2026 and beyond) should be treated with caution, and used only as a guide, particularly when translating these forecasts into a policy approach. Regular updating and review of the Study is recommended to ensure changes in the economy can be reflected accurately in any strategy.
- 2.10 The Study considers the existing level of vacancies within the town centres. If vacancy levels dropped to pre-recession averages, the reoccupation of these units could reduce the need for new retail floor space by approximately 4,500 sq.m (gross). However, many existing vacant units are generally small and in



secondary locations. These units may not be attractive to retailers seeking modern units and may therefore only be re-occupied by non-A1 uses. This could have an impact on the format of the district's town centre and should be reflected in emerging policy.

- 2.11 This chapter also considers the impacts of changes in shopper behaviour and the increasing propensity to shop and trade over the internet. This is classed as a special form of trading. The impact of internet shopping on high streets remains unclear. Some home delivery and internet shopping utilise existing stores rather than warehouses, such as Tesco Direct. Growth in internet sales will not always reduce the demand for shop floor space. In addition, some internet sales may divert trade from existing mail order companies rather than retail operators.
- 2.12 The Study recommends the requirement to assess future retail development against the sequential test should continue to apply. The Study also provides clarification on what the sequential test means in practice, which will be added to emerging policy to aid understanding.
- 2.13 Chapter 5 also considers development opportunities for each town centre. Within Buntingford, Hertford, Sawbridgeworth and Ware, the Study suggests there is limited opportunity for development other than small scale intensification and extensions. This would of course depend upon the completion of planned new stores and expansions including the Asda in Ware. Within Bishop's Stortford the Old River Lane redevelopment would absorb any demand for new floorspace in the short to medium term in Bishop's Stortford. However, the Goods Yard has the potential to accommodate further retail development. Sawbridgeworth shows the greatest potential in terms of expenditure, but due to the constraints of the town centre, most of this is likely to continue to be directed towards Bishop's Stortford and Harlow.
- 2.14 Chapter 6 of the Study considers an appropriate approach to town centre boundaries and primary and secondary frontages. The Study makes a series of recommendations which will need to be reflected in emerging Policy and balanced against the emerging strategy. The recommended approach is to indicate that the first preference for main town centre uses will be within the Primary shopping areas (i.e. the combined primary and secondary frontages) within the town centres of Bishop's Stortford, Hertford and Ware, and within the town centre

boundaries in Buntingford and Sawbridgeworth, and development outside of these areas will need to comply with the sequential approach and impact tests as set out in the NPPF.

- 2.15 Crucially, the Study recommends that there is no need to relax shopping frontage policies in order to encourage non-A1 Class uses to reoccupy vacant units or to regenerate rundown areas. Indeed a *laissez faire* approach in East Herts could result in the deterioration of shopping frontages and could undermine their role as shopping centres. It should be noted however, that recent national policy amendments permit changes to any Use Class for a period of two years, the only restriction being if the unit is within a Conservation Area or Listed Building. The question that is yet to be answered is 'what should happen to that unit once the two year period is up? Is it reasonable to expect a new, successful business to close or relocate especially if they are a Non-A1 Use within a primary frontage?
- 2.16 Chapter 7 concludes by summarising the findings of the Study and considers the implications on employment creation as a result of changes to retail development across the district. The retail floor space requirements and commitments combined could generate 3,129 direct jobs in East Herts by 2031. The potential full time equivalent job creation is 2,260 jobs. It should be noted that there will be some displacement from existing facilities to new floor space. Also, these figures relate only to direct jobs, there will be further indirect jobs associated with retail and service uses.
- 2.17 As with all technical studies, the recommendations in this Study will be used to inform the preparation of the District Plan and the emerging development strategy for each town and the District as a whole. It is therefore important to remember that these recommendations will need to be considered in relation to all the other planning issues and development needs of the district.

### 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 Retail and Town Centres Update Study, September 2013  
<http://www.eastherts.gov.uk/>
- East Herts Retail and Town Centres Update Study, September 2013

- Appendices <http://www.eastherts.gov.uk/>
- East Herts Retail and Town Centres Study, 2008

Contact Member: Cllr Mike Carver - Executive Member for Strategic Planning and Transport  
[mike.carver@eastherts.gov.uk](mailto:mike.carver@eastherts.gov.uk)

Contact Officer: Kevin Steptoe - Head of Planning and Building Control  
01992 531407  
[kevin.steptoe@eastherts.gov.uk](mailto:kevin.steptoe@eastherts.gov.uk)

Report Author: Jenny Pierce - Senior Planning Policy Officer  
[jenny.pierce@eastherts.gov.uk](mailto:jenny.pierce@eastherts.gov.uk)

This page is intentionally left blank

## ESSENTIAL REFERENCE PAPER 'A'

### IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p><b>People</b> This priority focuses on enhancing the quality of life, health and wellbeing, particularly for those who are vulnerable, and delivering strong services</p> <p><b>Place</b> This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p><b>Prosperity</b> This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic opportunities and delivering cost effective services.</p>
Consultation:	None
Legal:	None Known
Financial:	None Known
Human Resource:	None other than existing staff resources.
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 Retail and Town Centres Update forms an important part.

This page is intentionally left blank

## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 3 OCTOBER 2013

#### REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

#### STRATEGIC HOUSING MARKET ASSESSMENT UPDATE 2012 (MARCH 2013): LONDON COMMUTER BELT EAST SUB-REGION

WARD(S) AFFECTED: ALL

---

#### **Purpose/Summary of Report**

- This report sets out the key findings of the Strategic Housing Market Assessment (SHMA) Update 2012 (March 2013) technical study for the London Commuter Belt East Sub-Region, prepared by Opinion Research Services (ORS);
- It also seeks approval to the study forming part of the evidence base to inform and support the preparation of the District Plan, and for housing strategy purposes.

<b><u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE:</u> That:</b>	
<b>(A)</b>	<b>The Strategic Housing Market Assessment Update 2012 (March 2013): London Commuter Belt East Sub-Region, be supported as part of the evidence base to inform and support the preparation of the District Plan, and for housing strategy purposes.</b>
<b><u>RECOMMENDATIONS FOR COUNCIL:</u> That:</b>	
<b>(A)</b>	<b>The Strategic Housing Market Assessment Update 2012 (March 2013): London Commuter Belt East Sub-Region, be agreed as part of the evidence base to inform and support the preparation of the District Plan, and for housing strategy purposes.</b>

## 1.0 Background

- 1.1 In 2008 East Herts Council joined with Brentwood, Broxbourne, Epping Forest, Harlow and Uttlesford Council's, to form the London Commuter Belt East/M11 Sub Region partnership, and appointed ORS to undertake a SHMA for the sub-region. The final SHMA report was published in January 2010 and agreed by the Council in February 2010.
- 1.2 To support the 2010 SHMA, a SHMA Viability Assessment was undertaken by Levvel on behalf of the sub-regional partnership (excluding Broxbourne which opted to commission its viability work separately). The final SHMA Viability Assessment was published in August 2010 and agreed by the Council in December 2010.
- 1.3 The original 2008 SHMA covered the period 2007 to 2026 and was, therefore, in need of updating to cover the plan periods of local authority partners, and changes in demographic and economic information and circumstances.
- 1.4 The SHMA Update report was commissioned in May 2012, again from ORS, and finalised in March 2013.
- 1.5 A SHMA is a technical study that will be used for both planning policy and housing strategy purposes. It is required by the National Planning Policy Framework (NPPF) March 2012. NPPF paragraph 159 states (inter alia):

*'Local planning authorities should have a clear understanding of housing needs in their area. They should:*

- *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period....'*

- 1.6 The purpose of the SHMA is to assess current and future housing demand and need across the plan area. It should also consider future demographic trends and identify the accommodation requirements of specific groups. Importantly, the SHMA will be used to inform decisions relating to affordable housing, tenure mix and the type and mix of houses that are to be built in East



Herts.

1.7 The SHMA Update 2012 (March 2013) is available on the Council's website. See Background Papers link at the end of this report.

## 2.0 Report

2.1 The SHMA Update considers the following issues:

- The existing housing stock of the area
- Property prices and affordability
- The role of the private rented sector in meeting housing need
- The impact of Government policy changes since 2010
- Current housing need
- Future housing requirements from 2011-2033

2.2 In terms of informing the District Plan, the key findings are found in Chapter 2 of the study entitled: '*Projecting Future Housing Requirements*'.

2.3 For the purposes of projecting future housing requirements, the SHMA Update uses as a basis the Greater Essex Demographic Forecasts: Phase 3, which in turn use the Office for National Statistics (ONS) 2010 Based Sub-National Population Projections. These population projections have since been partially updated by more recent interim population and household projections, as reported to the Panel on 25 July 2013 (Agenda Item 8: Population and Household Projections: Update Report). The key information in the SHMA Update is still relevant for informing the District Plan.

2.4 The SHMA Update identifies dwelling requirements by tenure and size mix. Based on Figure 41 in the study the following tenure/size mix proportions are identified for the District Plan period.

## Tenure/Size Mix Proportions (%) 2011-2031

Housing Type	1 bedroom	2 bedroom	3 bedroom	4 bedroom	5+ bedroom
All	17%	27%	40%	13%	3%
Market	5%	11%	55%	24%	5%
Intermediate Affordable Housing/ Shared Ownership	22%	51%	25%	2%	0%
Social Rented/ Affordable Rented	41%	31%	25%	3%	0%

2.5 Using the ‘*Trend Based Projections*’ the SHMA Update at Figure 39 is identifying for the District Plan period, a housing requirement tenure mix of:

- Market Housing: 51%
- Intermediate Affordable/Shared Ownership: 32%
- Social Rented/Affordable Rented: 17%

The SHMA Update is, therefore, identifying a total affordable housing requirement of 49% of all housing provision. In terms of the affordable housing element, it is showing a tenure mix of 66% intermediate affordable/shared ownership and 34% social/affordable rented.

2.6 It should be stressed that this SHMA information and the percentage splits will inform the housing policies in the District Plan, not determine them. The SHMA is a starting point. It is a technical study, the findings of which are used to inform the policy making process. The SHMA figures, therefore, need to be interpreted both in terms of their viability and the Council’s overall approach to housing delivery and management.

2.7 The interpretation of the SHMA also needs to be considered in the context of a changing housing market. The SHMA covers the period 2011 to 2033. Perhaps the most significant prediction is that the proportion of owner-occupiers will reduce significantly.

Coupled with this shift is a change in demographic structure across the UK, which is reflected at the local level, where it is predicted that people over 65 will significantly increase, and their needs will be required to be reflected in terms of housing provision.

- 2.8 To provide further information and policy guidance on the issue of 'older people', a separate SHMA related study has been commissioned from ORS, entitled: *New Specialist Housing Requirements for Older People*. At the time of writing this report, this further study is still awaited. It is intended to report this study to the next Panel meeting on 18 November 2013.
- 2.9 Also set out in paragraph 2.5 above, is the assessment that some 66% of the affordable housing requirement is for intermediate affordable/shared ownership, i.e. housing at prices above those for social/affordable rented but below market prices or rents, such as key worker housing. The social/affordable rented proportion of affordable housing is shown as 33%. This finding, projected over the plan period, is different to that which the Council currently seeks of 75% social/affordable rented and 25% intermediate/shared ownership.
- 2.10 The intermediate affordable/shared ownership and social/affordable rented tenure split in the SHMA Update is based on the theoretical modelling that underpins the SHMA, which seeks to 'balance' the housing market, i.e. trying to ensure that the availability of all housing (supply) meets both housing need and demand. However, the Council's Housing Register continues to demonstrate an ongoing pressing need for social and affordable rented housing.
- 2.11 Since the SHMA was undertaken a number of the affordable housing products have either been redefined or are not being developed by Registered Providers (housing associations) in East Herts. The intermediate affordable products being developed by Registered Providers have been reduced down to one which is shared ownership and is offered to any resident that qualifies and can afford to purchase. The previous intermediate rent product, that was set at 80% of market rent and offered on an assured short hold tenancy, is no longer being developed and has become part of the affordable rent products let through the Council's Housing Register on either lifetime or fixed term tenancies and is, therefore, comparable to social rent. There are currently no new properties being developed that are specifically for key workers

or offered on an intermediate rent outside the Council's Housing Register.

2.12 The consequence of this is that intermediate affordable is no longer an available affordable housing tenure, and shared ownership has a much more limited role, in terms of an affordable housing product. In effect, therefore, the main affordable housing tenure to be sought through housing schemes continues to be social/affordable rented.

2.13 The findings of the SHMA Update raise a number of questions in relation to the delivery of housing in East Herts, which require careful consideration before the Council's final housing and planning policies emerge as part of the District Plan.

### 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

Strategic Housing Market Assessment Final Report January 2010 and Viability Study Update: Agenda Item 5: Local Development Framework Executive Panel: 28 January 2010

Strategic Housing Market Assessment: Viability Assessment For London Commuter Belt (East)/M11 Sub-Region: Final Report (August 2010)

LCB East Sub-region Strategic Housing Market Assessment Update 2012 (March 2013) [www.eastherts.gov.uk/shma](http://www.eastherts.gov.uk/shma)

Contact Member: Cllr Mike Carver – Executive Member for Strategic Planning and Transport  
[mike.carver@eastherts.gov.uk](mailto:mike.carver@eastherts.gov.uk)

Contact Officer: Kevin Steptoe – Head of Planning and Building Control  
01992 531407  
[kevin.steptoe@eastherts.gov.uk](mailto:kevin.steptoe@eastherts.gov.uk)

Report Author: Bryan Thomsett – Planning Policy Manager  
[bryan.thomsett@eastherts.gov.uk](mailto:bryan.thomsett@eastherts.gov.uk)

## ESSENTIAL REFERENCE PAPER 'A'

### IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p><b>People</b> This priority focuses on enhancing the quality of life, health and wellbeing, particularly for those who are vulnerable, and delivering strong services</p> <p><b>Place</b> This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p><b>Prosperity</b> This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic opportunities and delivering cost effective services.</p>
Consultation:	None
Legal:	None Known
Financial:	None Known
Human Resource:	None other than existing staff resources.
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 Strategic Housing Market Assessment forms an important part.

This page is intentionally left blank

## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 3 OCTOBER 2013

#### REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

#### EAST HERTS DISTRICT-WIDE GREEN BELT REVIEW – PART 1 (SEPTEMBER 2013)

WARD(S) AFFECTED: ALL

### **Purpose/Summary of Report**

- This report summarises the findings of the East Herts District-Wide Green Belt Review – Part 1 (September 2013), and seeks endorsement to use the Review to inform the preparation of the East Herts District Plan.

### **RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:**

<b>(A)</b>	<b>The East Herts District-Wide Green Belt Review – Part 1, September 2013, be supported as part of the evidence base to inform and support the East Herts District Plan.</b>
------------	---

### **RECOMMENDATIONS FOR COUNCIL: That:**

<b>(A)</b>	<b>The East Herts District-Wide Green Belt Review – Part 1, September 2013, be agreed as part of the evidence base to inform and support the East Herts District Plan.</b>
------------	--

#### 1.0 Background

1.1 Over the last two years the Council has been undertaking a process of short-listing options as part of the emerging development strategy to deliver the District's objectively assessed needs. Evidence gathered through this process, including through the ongoing Strategic Land Availability Assessment, indicates that only a small fraction of the District's residential development needs can be accommodated within the existing built-up areas on previously developed sites. There is therefore no option but to look outside the towns for suitable locations in which to

accommodate development. As four of the five main towns in the District are surrounded by Green Belt, this will result in the need to release Green Belt land.

1.2 In order to inform the strategy selection process and to determine the most suitable and appropriate location for development within the Green Belt, a Green Belt Review is being undertaken.

The purpose of the Review as a whole is twofold:

- To address whether the District's objectively assessed need for development can be accommodated within the constraints created by the Green Belt;
- To inform the strategy selection process of the District Plan.

1.3 The Review is split into two parts. The purpose of Part 1 of the Green Belt Review is to:

- Assess the District's entire Green Belt against the purposes of the Green Belt as defined by the National Planning Policy Framework (NPPF).

1.4 Part 1 of the Review will inform the Detailed Site Assessments undertaken in Part 2 of the Review, which will be presented to the District Plan Executive Panel on 3<sup>rd</sup> December 2013 alongside the emerging development strategy for the Draft District Plan. The December Report will also include more information on the Council's approach towards Major Developed Sites in the Green Belt, minor boundary amendments necessary as a result of digital mapping improvements, new or compensatory Green Belt and the approach towards safeguarding Green Belt land for future development beyond the emerging Plan period.

## 2.0 Report

2.1 Chapter 1 of the Green Belt Review introduces the Review and outlines the background and purposes of the Review. It explains the national approach to Green Belts as defined by the NPPF, setting the context for the Review. A very recent High Court (*Hunston Properties Ltd vs' Secretary of State for Communities and Local Government and St Albans City and District Council*, 5.9.2013) decision has made the national approach to Green Belts clearer than ever before. In response to a Judicial Review of an application for Green Belt development in St Albans, a High Court Judge stated that "*Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very*



*special circumstances*” (paragraph 29). In this context, the decision to release a location from the Green Belt in order to enable a fully evidenced development strategy supporting a District Plan would depend on the balance of many strategic planning factors. This Review therefore seeks to inform whether the development strategy would be possible in relation to Green Belt principles.

- 2.2 Chapter 2 of the Review explains the methodology used in this Review. The methodology for Part 1 of the Green Belt Review is straightforward – the District is broken down into large segments based upon those established for the Landscape Character Assessment, 2007. It then assesses each of these segments against four of the five Green Belt purposes using a set of criteria. At this stage, Part 1 is very high-level and does not seek to determine which parts of the Green Belt is needed or should be released for development. It simply informs the Detailed Site Assessments in Part 2 of the Review and the initial strategy selection process.
- 2.3 The results of this District-Wide high level Review of the Green Belt is summarised in a series of maps and tables, using a basic colour coding system based upon the contribution each segment plays against the criteria devised for each Green Belt Purpose. See **Essential Reference Paper ‘B’**.
- 2.4 As part of this Review research has been undertaken into the approaches taken by neighbouring authorities. We will be keeping a watching brief on the approach towards the Green Belt taken for each of our neighbours, responding as necessary to any consultations. In summary:
- Broxbourne Council has undertaken both an inner boundary review and a two stage review in 2008. It is presumed that there will be an update presented as part of their anticipated forthcoming revised draft Local Plan.
  - Uttlesford District Council undertook a Green Belt Boundary Scoping Report in 2011 in order to consider the principle of allocating land for development within the part of their district which is currently within the Green Belt.
  - Welwyn Hatfield Council has joined with St Albans City and District Council and Dacorum Borough Council to undertake a Green Belt Review. The methodology is very similar to those used for the East Herts Green Belt Review. Part 1 of the joint Review will be published in the next few months.
  - Stevenage Borough Council published Part 1 of their Green

Belt Review as part of their Local Plan 1<sup>st</sup> Consultation earlier this year. Their methodology is again very similar.

- North Herts District Council have identified a need for a Green Belt Review and have expressed a desire to extend the Green Belt in order to provide further protection in strategic gaps between settlements. So far Green Belt issues have been covered in a number of technical documents, but not in the form of a single Green Belt Review.

2.5 The recommendations in this Review will be used to inform the preparation of Part 2 of the Green Belt Review, the District Plan and the emerging development strategy for each town and the district as a whole. It is therefore important to remember that these recommendations will need to be considered in relation to all the other planning issues and development needs of the district.

### 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

- Criteria-Based Assessments on Green Belt, Strategic Gaps and Boundary Limits, included in Chapter 3 of the Strategy Supporting Document, presented to the District Plan Executive Panel 29 March 2012.

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

Contact Member: Cllr Mike Carver - Executive Member for Strategic Planning and Transport  
[mike.carver@eastherts.gov.uk](mailto:mike.carver@eastherts.gov.uk)

Contact Officer: Kevin Steptoe - Head of Planning and Building Control  
01992 531407  
[kevin.steptoe@eastherts.gov.uk](mailto:kevin.steptoe@eastherts.gov.uk)

Report Author: Jenny Pierce - Senior Planning Policy Officer  
[jenny.pierce@eastherts.gov.uk](mailto:jenny.pierce@eastherts.gov.uk)  
Katie Simpson – Planning Policy Officer  
[katie.simpson@eastherts.gov.uk](mailto:katie.simpson@eastherts.gov.uk)

## ESSENTIAL REFERENCE PAPER 'A'

### IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p><b>People</b> This priority focuses on enhancing the quality of life, health and wellbeing, particularly for those who are vulnerable, and delivering strong services</p> <p><b>Place</b> This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p><b>Prosperity</b> This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic opportunities and delivering cost effective services.</p>
Consultation:	None
Legal:	None Known
Financial:	None Known
Human Resource:	None other than existing staff resources.
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 District-Wide Green Belt Review – Part 1 forms an important part.

This page is intentionally left blank



ESSENTIAL REFERENCE PAPER 'B'

# **East Herts District-Wide Green Belt Review – Part 1**

## **September 2013**

Page left intentionally blank

## Contents

<b>1.</b>	<b>Introduction.....</b>	<b>5</b>
1.1	Scope of the Green Belt Review.....	5
1.2	Background to the Review.....	7
1.3	Approach taken for the East Herts Green Belt Review.....	9
1.4	Review of Existing Green Belt Review Methodologies.....	10
<b>2.</b>	<b>District-Wide Review.....</b>	<b>12</b>
2.1	Previous Technical Work on Green Belt.....	12
2.2	Approach and Methodology to the District-Wide Review.....	14
	<b>Appendix 1: Results of Part 1 – High Level Review.....</b>	<b>25</b>

Page left intentionally blank



# 1. Introduction

## 1.1 Scope of the Green Belt Review

- 1.1.1 This Review seeks to address whether the District's objectively assessed need for development can be accommodated within the constraints created by the Green Belt. It explores the relationship between the strategy and the purposes of the Green Belt. While the focus in recent decades has been to concentrate development into existing built-up areas utilising previously developed land, there is a finite amount of this type of land available, resulting in a need to explore options on the edges of the existing towns or even a new settlement. As four of the five main towns in East Herts are surrounded by Green Belt this would result in the need to explore the potential for Green Belt land to accommodate some development. The research undertaken throughout the plan-making process provides evidence of an objectively assessed need for new development. The only appropriate time to review Green Belt boundaries is in response to a justified objectively assessed need. At the same time, without a Green Belt Review there could be no development strategy.
- 1.1.2 Green Belts have always been a highly emotive subject, and as a policy, has arguably been one of the most successful policies in UK Planning history. As such, consecutive Governments have attached great importance to Green Belts. Retaining the principles set out in the well-established but now revoked Planning Policy Guidance Note 2: Green Belts, the National Planning Policy Framework (NPPF) sets out the policy requirements for Green Belts (paragraphs 79 to 92): *'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'*
- 1.1.3 Green Belts serve five purposes:
- *To check the unrestricted sprawl of large built-up areas;*
  - *To prevent neighbouring towns merging into one another;*
  - *To assist in safeguarding the countryside from encroachment;*
  - *To preserve the setting and special character of historic towns; and*
  - *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*
- 1.1.4 This Review will address each of these purposes in order to determine which Green Belt sites are suitable, and sequentially preferable to release for strategic development needs. It assesses the district's Green Belt at a variety of levels, from a district-wide level down to specific sites and assigns a score for each in order to aid comparison. Commentary has been included where this helps to clarify discrepancies or raise site-specific issues that will need to be considered.
- 1.1.5 The NPPF sets out some of the functions of the Green Belt and requires local planning authorities to plan positively to enhance the beneficial use of the

Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land (paragraph 81). It also defines the role of Green Belts in promoting sustainable patterns of development: *'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development'* (paragraph 84). This Review considers these issues by considering the role of the district's Green Belt from a district-wide to site specific level, making recommendations to the emerging development strategy as appropriate.

1.1.6 Local planning authorities are required to establish Green Belt boundaries in their local plans to set the framework for Green Belt and settlement policies. Green Belt boundaries should only be established as part of the preparation or review of a local plan and should only be altered in exceptional circumstances. As such, it is important that boundaries are established with regard to their intended permanence, enduring beyond the emerging plan period. There are six criteria within the NPPF that should be considered when defining Green Belt boundaries. Local planning authorities should:

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent (NPPF, 2012, paragraph 85).*

1.1.7 Addressing each of these points in turn; as has already been stated, there is an identified need for development within East Herts over the emerging plan period. Through the sieving process a large number of potential development locations have been discounted for various reasons, leaving a reasonable shortlist of options. This Review as a whole seeks to determine whether land within the shortlist should be kept permanently open for Green Belt purposes. It also suggests subsequent alterations to the Green Belt boundary where necessary, that will not need altering at the end of the development plan period, and which are defined clearly using recognisable physical features which are likely to be permanent. The Review therefore makes recommendations of where alterations to the Green Belt boundary will be needed in order to accommodate the needs identified, in order to achieve the delivery of the development strategy in the District Plan.

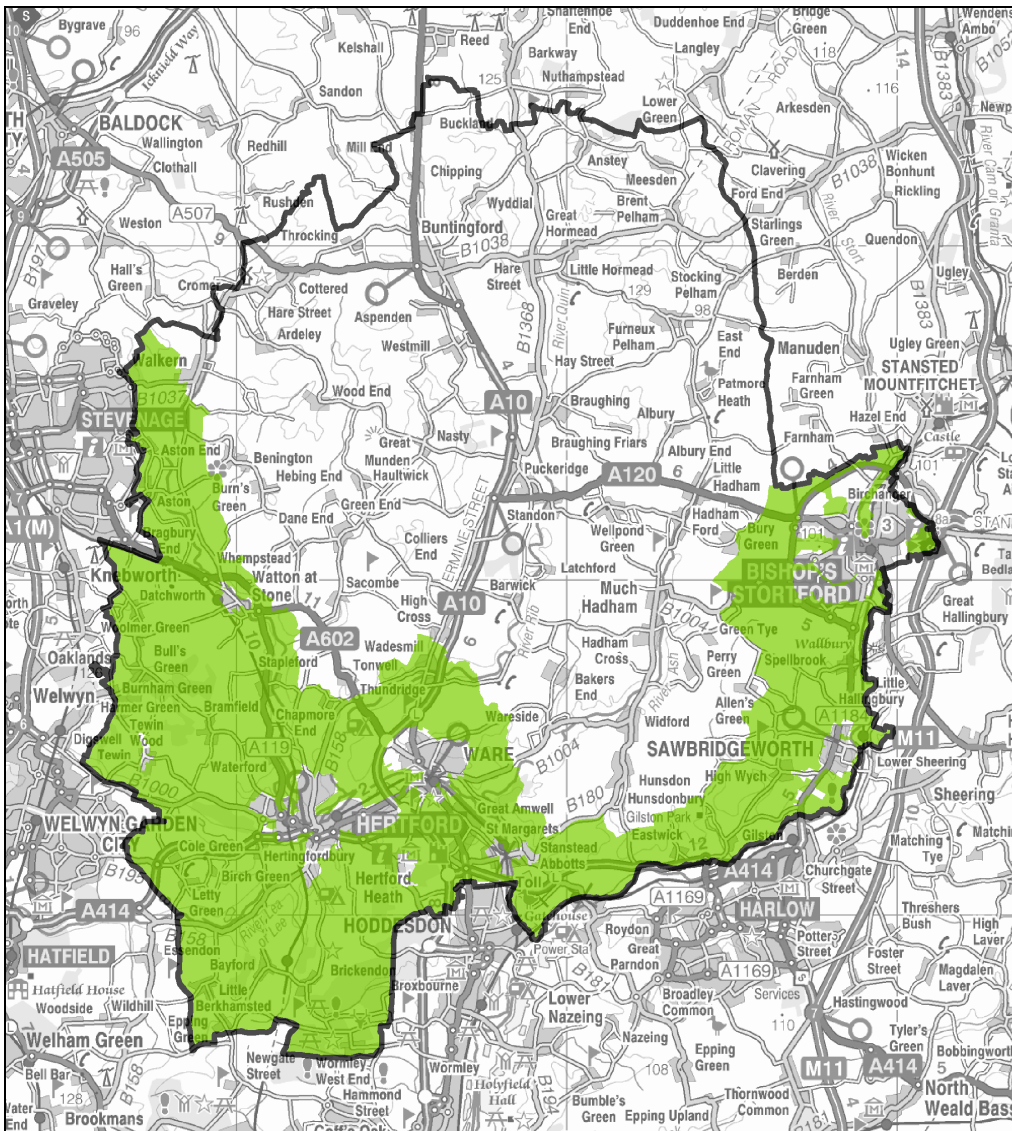
1.1.8 It is important that the Green Belt Review forms an integrated part of the development strategy. Without Green Belt boundary amendments, the

strategy cannot be delivered. At the same time, there is no need for a Green Belt Review unless a development strategy determines and justifies the need to review the Green Belt. As such, the Review seeks to estimate the approximate quantum of development that could occur as a result of the recommended boundary amendments which will be used to inform the development strategy. The findings of the Review are presented in the form of detailed tables with supporting maps and commentary.

## **1.2 Background to the Review**

- 1.2.1 Approximately the southern third of the district lies within the London Metropolitan Green Belt (17,530 hectares). The remainder of the district is covered by the 2007 Local Plan Second Review policy area of 'Rural Area Beyond the Green Belt'. Four of the district's main towns are surrounded by Green Belt; Bishop's Stortford, Hertford, Sawbridgeworth and Ware (see Figure 1.1).
- 1.2.2 In the absence of a regional or county-wide plan, the duty to plan for Green Belts falls to the local planning authority, which should set the framework for Green Belt and settlement policy and determine the appropriateness of existing Green Belt boundaries during the review of a local plan. The Green Belt policy should consider the ability of Green Belt boundaries to remain effective for the time period proposed for the District Plan and beyond i.e. its permanence. *'Once established, Green Belt boundaries should only be altered in exceptional circumstances'* (NPPF, 2012, paragraph 83).
- 1.2.3 The Green Belt in East Herts has been established since the 1970's to the south of Hertford and Ware, and since 1993 has extended to wrap around Bishop's Stortford. Since then there have been few changes to the Green Belt in the district. Minor alterations have typically occurred on the urban fringe when digitisation of the proposals map enabled the boundary to be 'neatened'. The 2007 Local Plan Second Review proposed some alterations to the Green Belt to facilitate education planning to the south of Bishop's Stortford, but this was not accepted by the Local Plan Inquiry Inspector.
- 1.2.4 The NPPF states that *'when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'* (NPPF, 2012, paragraph 84).

Figure 1.1: Designated Green Belt in East Herts District (Local Plan Review 2007)



1.2.5 Given that East Herts is a very large district with a relatively large rural area which lies beyond the Green Belt, a policy of general restraint has been applied across the district. The local policy is almost identical to Green Belt policy, and this approach has been approved by Inspectors since the 1993 Local Plan. In response to the Issues and Options consultation, many comments were received to the effect that the Green Belt should not be altered and this approach to restraint should remain. However, as the consultation document explained; *'whilst we acknowledge that two-thirds of the district is not covered by Green Belt, we do not think that it would be either realistic or sustainable to propose a development strategy option which seeks to locate development exclusively outside the Green Belt'* (Issues and Options Consultation Document, 2010, Section 3.6).

1.2.6 We know that there is a finite amount of brownfield or previously developed land within the urban areas of our towns. Future recycling of urban land is

likely to take the form of intensification of existing buildings or estates, the act of which could create increased demand for existing services and facilities, but due to the constrained nature of such sites these developments tend not to be able to provide essential community facilities or infrastructure on site. Since four of the district's five towns and many of the villages are surrounded by Green Belt, it is doubtful whether it is possible to meet the requirement to 'promote sustainable patterns of development' without reviewing the Green Belt and extending existing settlements. It would also be very difficult and expensive to provide adequate supporting infrastructure if all development were to take place beyond the Green Belt, given that the settlements outside the Green Belt areas are relatively small.

- 1.2.7 If development in East Herts was located solely within or around Bishop's Stortford, Hertford, Sawbridgeworth and Ware, i.e. within the Green Belt, this would undermine the ability of villages and the town of Buntingford to maintain a viable community. It would also result in additional development pressure on the towns.
- 1.2.8 It is important to recognise that the Green Belt is simply a strategic planning tool used to ensure that the fundamental aim and the five purposes of the Green Belt are met. Given the need for development in the district, it is difficult to balance both protecting the Green Belt and enabling sustainable development. The most proactive approach is to assess Green Belt principles, and see where the most important areas of Green Belt lie, and then review Green Belt boundaries in accordance with this assessment. If there is no option but to develop in the Green Belt, the best locations need to be sought.
- 1.2.9 It is important to note that just because a location is within the Green Belt this does not, for the purposes of strategic planning, preclude the potential for development to be located there. Nor would this assessment be the sole consideration when developing the strategy. In response to a Judicial Review of an application for Green Belt development in St Albans<sup>1</sup>, a High Court Judge stated that "*Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special circumstances*" (paragraph 29). Whether a location forms part of the development strategy or not would depend on the balance of many strategic planning factors. This assessment therefore seeks to inform whether the development strategy would be possible in relation to Green Belt principles.

### **1.3 Approach taken for the East Herts Green Belt Review**

- 1.3.1 Following a desk-based study into a number of Green Belt reviews completed over recent years, a hybrid methodology has been established in order to determine what the strategic needs of the district are in terms of its Green Belt. The Review takes the form of five parts.

---

<sup>1</sup> Hunston Properties Ltd vs' Secretary of State for Communities and Local Government and St Albans City and District Council, 5.9.2013)

- Part 1 – District-Wide Review
- Part 2 – Detail Site Assessment and Boundary Review
- Part 3 – Major Developed Sites
- Part 4 – Minor Boundary Amendments
- Part 5 – New Green Belt
- Part 6 – Long Term Needs

1.3.2 Each part of this review has been designed in a bespoke manner and has been fully integrated with the preparation of the development strategy. The methodology for Part 1 of the Review is straightforward and can be presented as a stand-alone piece of work. Part 2 of the Review which consists of a detailed site assessment comprises two stages: firstly, to assess how an area of search or a sub-area within it performs its Green Belt role against the five Green Belt purposes and therefore whether the area should be retained as Green Belt or could be considered for release in response to a need for development; secondly, a consideration of potential boundaries that could be used to reinforce the Green Belt if a release were to occur in this location. The connection between the strategy selection process and the Green Belt Review is fairly complicated and is explained in more detail in Part 2 of the Review. In this way, this review illustrates a narrative of how Green Belt considerations have been managed in relation to the preparation of the District Plan.

1.3.3 In line with the requirements of the NPPF, the Review details in Parts 3, 4, 5 and 6 how the development strategy will approach major developed sites within the Green Belt, minor amendments to inner boundaries as a result of enhancements to digital mapping technology, new or compensatory Green Belts and any potential requirements for Green Belt allocations within or beyond the emerging plan period. These sections will be presented as part of the overall approach to Green Belt alongside the proposed development strategy.

## **1.4 Review of Existing Green Belt Review Methodologies**

1.4.1 In order to inform this Review, a desk-based assessment has been undertaken of the approach taken by neighbouring authorities and of similar Reviews undertaken over the last few years. There are few consultancies that specialise in Green Belt Reviews, and without a standard national approach they tend to refer to the approaches taken in existing Reviews. Each Review however is adapted to meet the specific circumstances of the authority and as such no one methodology is the same.

1.4.2 Broxbourne Council undertook an inner boundary review in 2008 (Prospect Planning) and a two stage Review of the Green Belt in 2008 (updated in 2010) by Scott Wilson. It is presumed that there will be an update presented as part of their anticipated forthcoming revised draft Local Plan. Both studies were undertaken in the policy context of PPG2 and the Regional Spatial Strategy for the East of England. The Scott Wilson methodology is very similar to the approach East Herts Council has taken, differing only in that each area is

scored against weighted criteria.

- 1.4.3 Uttlesford District Council undertook a Green Belt Boundary Scoping Report in 2011 in order to consider the principle of allocating land for development within the part of their district which is currently within the Green Belt. It is a fairly limited Report, focussing largely on their response to the East Herts Issues and Options Consultation. As none of the options presented by Uttlesford District Council so far are located within the small strip of Green Belt which lies across the southern edge of the district, the Scoping Report identifies no need to review the Green Belt in response to their own needs.
- 1.4.4 Welwyn Hatfield Council has joined with St Albans City and District Council and Dacorum Borough Council to undertake a Green Belt Review. The methodology is very similar to that used for the East Herts Green Belt Review. Part 1 of the joint Review will be published in the next few months. The study area extends eastwards from Welwyn Garden City to include land at Panshanger Park and up to the urban edge of Hertford. Whilst this approach is logical it will be necessary to ensure that any recommendations presented in the Review are considered carefully in the light of the Duty to Co-operate.
- 1.4.5 Stevenage Borough Council published Part 1 of their Green Belt Review as part of their Local Plan 1<sup>st</sup> Consultation earlier this year. Their methodology is again very similar. In responding to Stevenage's consultation East Herts Council identified a number of concerns over the consistency of the scoring of sites within the Green Belt to the east of the town as this is largely within East Herts District. Part 2 of the Stevenage Green Belt Review will need to contain a detailed site assessment in response to the emerging development strategy for Stevenage. It will be necessary to ensure that any recommendations presented in the Stevenage Review are considered carefully in the light of the Duty to Co-operate.
- 1.4.6 North Herts District Council has identified a need for a Green Belt Review and has expressed a desire to extend the Green Belt in order to provide further protection in strategic gaps between settlements. So far Green Belt issues have been covered in a number of technical documents, but not in the form of a single Green Belt Review.

## 2. District-Wide Review

### 2.1 Previous Technical Work on Green Belt

- 2.1.1 Chapter 1 of the Strategy Supporting Document sets out the iterative process guiding the preparation of the District Plan. It explains how the Council has considered various scales and types of development across the entire district, moving towards smaller scales of development at more specific locations or Areas of Search. The first stage of the Plan preparation involved identifying the strategic issues faced by the district and how the district plan could help resolve those issues. Chapter 2 of the Strategy Supporting Document details these issues in the form of Strategic Overviews. The Green Belt acts as a clear constraint to be considered in the preparation of the development strategy. The Green Belt Strategic Overview identified the need for a Green Belt Review and set out how the Green Belt would be assessed as part of the Plan preparation processes.
- 2.1.2 Chapter 3 of the Strategy Supporting Document sets out the process of identifying and refining Areas of Search for different scales of development. Carried out in three stages, the first stage was to identify large areas of search capable of accommodating a new settlement of approximately 5,000 dwellings. Of the fourteen areas considered, eight were discounted as being unsuitable against three criteria: transport infrastructure, settlement networks and coalescence risks. Six options were taken forward to be assessed in further detail, and as a result of this very high level assessment, three smaller areas of search were identified adjacent to three neighbouring towns.
- 2.1.3 The second stage of Chapter 3 was to create a range of criteria-based assessments against which each location was tested. 21 topics were created which included three on Green Belt issues:
- **Green Belt** – whether an area of search is within the Green Belt or not. This would not act as an absolute constraint to development, rather it sought to simply highlight the fact that further detail would need to be sought if the location was taken through to the next stage;
  - **Strategic Gaps** – whether an area of search lies in a location that forms a strategic gap between two settlements that is necessary in preventing coalescence. Strategic Gaps usually refer to neighbouring towns within the Green Belt. However, the settlement pattern in East Herts is such that the gaps between towns and nearby villages (some beyond the Green Belt) are just as important in some cases as the gaps between towns and therefore were also given consideration during this criteria-based assessment; and
  - **Boundary Limits** – whether there are clear identifiable features that could form physical or visual boundaries to any potential development within that area of search.



- 2.1.4 The third stage was the testing of each area of search (69 in total) against the criteria to give a traffic light rating. The criteria-based assessments of Strategic Gaps and Boundary Limits have informed the District-wide high level Review where it relates to the three related purposes of the Green Belt as set out in the NPPF; its role in preventing merging between towns, its role in checking unrestricted sprawl and in preventing encroachment into the countryside. The Green Belt purposes relating to historic towns and safeguarding the countryside which the high level Green Belt Review assessed are considered as part of other criteria-based assessments including Historic Assets, Designated Wildlife Sites, Landscape Character, Agricultural Land and Environmental Stewardship. The three Green Belt criteria-based assessments were undertaken at a high level and therefore formed a useful tool when sieving out unreasonable alternative development options. They also form a useful starting point for both the high-level and more detailed Green Belt Review.
- 2.1.5 The Topic Assessments carried out for Chapter 3 of the Strategy Supporting Document considered Areas of Search against three criteria. Table 2.1 below shows the criteria used for the Boundary Limit assessment. The criteria-based assessment was designed to be high-level based upon initial scale assumptions of 500 dwellings. The District-Wide Assessment subject to this Review is based upon a different set of criteria, looks at far broader areas and is designed to cover more than boundary features (see Table 2.3). The two assessments use a similar red, amber, green rating system where red denotes significant issues that would need further investigation for example. However, the reasoning behind each colour rating is different and therefore comparative areas may not score the same.

Table 2.1: Assessment Criteria used for Boundary Limit Assessment in Chapter 3 of the Strategy Supporting Document

<b>Red</b>	Areas that are within the Green Belt/Rural Area Beyond the Green Belt and do not have a clear boundary limit to growth.
<b>Amber</b>	Areas that are within the Green Belt/Rural Area Beyond the Green Belt, which do not have a clear boundary limit to growth in all directions.
<b>Green</b>	Areas that are within the Green Belt/Rural Area Beyond the Green Belt and have a clear boundary limit to growth.

- 2.1.6 Chapter 4 of the Strategy Supporting Document refines this further by considering the cumulative impacts of development around a settlement. Chapter 4 takes all the criteria-based assessments and considers them in relation to each other to determine the relative importance of each issue for that particular location. For example, the lack of education capacity may be of greater importance than the fact that the location was within the Green Belt, or that the risk of flooding outweighed the fact that a location had good employment land potential. In this way Green Belt is considered as part of a balance of wider considerations.

2.1.7 The second stage of Chapter 4 involved evaluating the results of the Area Assessments on a town or settlement basis in order to consider the possible implications of combinations of development options on the town as a whole and to refine the assumed scales of development at each Area of Search. For example, one area of search could potentially accommodate 500 dwellings, but once this area is combined with one or more around the same town, the scale of development may be too great and the overall numbers would need to be scaled down accordingly. The results of the Settlement Evaluations are included in **Chapter 4 of the Strategy Supporting Document**.

## **2.2 Approach and Methodology to the District-Wide Review**

2.2.1 This part of the Green Belt Review seeks to assess the East Herts Green Belt at a District-wide level. As the Council is undertaking this Review independently of other authorities, it is not directly taking account of other authorities published or emerging Green Belt Studies. However, the plan-preparation process as a whole will consider issues of cross-boundary development within the Strategy Supporting Document in relation to the Duty to Co-operate.

2.2.2 As a starting point, the district will be divided into areas based upon the boundaries established in the Landscape Character Assessment (LCA) 2007. The LCA boundaries were, where possible, made to follow identifiable features visible on the ground, or along contour lines or between fixed features where no visible features were present. This approach is consistent with the approaches used for similar Green Belt Reviews. For the purposes of this stage of the Green Belt Review some of the LCA areas are grouped where they perform similar roles in Green Belt terms. These groupings reflect physical boundaries such as major roads and landscape features where necessary. For example, the LCA divides the woodland to the south of Hertford into several LCA areas. However, the whole of this land has the same characteristic and role in Green Belt terms at this high-level, and as such have been grouped as one area for the purposes of this assessment. Similarly, larger LCA areas have been divided where a smaller land area would enable a more accurate assessment of the Green Belt purposes. Table 2.2 below shows the identification number for the district-wide assessment and the corresponding LCA identification numbers with a brief description.

Table 2.2 District Wide Assessment Areas with Corresponding Landscape Character Assessment Area

District-Wide Assessment ID	Corresponding Landscape Character Assessment Area
1	39 – Middle Beane Valley
2	38 – Aston Estate Farmland
3	40 – Bramfield – Datchworth Sloping Farmland
4	41 – Bramfield Wood, Tewin Wood and Datchworth Uplands
5	70 – Woodhall Park and Watton-at-Stone Slopes
6	42 – Tewin, Dawley and Lockley Estate Farmland

7	67 – Bramfield Plain
8	68 – Lower Beane Valley
9	69 – Stonyhills
10	75 – Lower Rib Valley
11	76 – Ware Parklands
12	90 – Middle Rib Valley
13	89 – Wareside – Braughing Uplands
14	43 – Mimram Valley Parklands
15	77 – Kingsmead and Hartham Common Floodplain
16	45 – Welwyn Fringes
17	44 – Panshanger Parkland
18	66 – Cole Green and Hertingfordbury Settled Farmland
19	65 – Middle Lea Valley West
20	47, 48, 49 – Essendon – Brickendon Farmed Slopes, West End – Brickendon Wooded Slopes, Little Berkhamsted Ridge Settlements
21	63 – Bayfordbury, Brickendonbury and Balls Parkland
22	62, 57 – Broxbourne Woods Complex, Thunderfield Ridges
23	64 – Hertford Heath
24	78 – Great Amwell Ridge and Slopes
25	79, p77 – Amwell Floodplain, part Kingsmead and Hartham Common Floodplain
26	88 – Lower Ash Valley
27	80 – Rye Meads
28	81 – Stanstead to Pishiobury Parklands
29	81, 82 – Stanstead to Pishiobury Parklands, River Stort
30	81 – Stanstead to Pishiobury Parklands
31	82 – River Stort
32	84, 82 – High Wych Slopes, River Stort
33	84 – High Wych Slopes
34	85 – Thorley Uplands
35	85 – Thorley Uplands
36	85, 82 – Thorley Uplands, River Stort
37	86 – Perry Green Uplands
38	150 – Hadhams Plateau
39	149, 151 – Bourne Brook Valley, Stort Meads
40	None – Bishop's Stortford Golf Course
41	None / Birchanger Wood and land within Uttlesford District

2.2.3 Map 2.1 below illustrates the areas used and the corresponding ID numbers.

2.2.4 Each of these areas is assessed against four of the five purposes of the Green Belt.

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

Not assessed:

- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.2.5 In undertaking this assessment, it is important to maintain consistency. As such, a loose set of criteria are applied for each purpose so the reader can understand the matters considered. These are contained in Table 2.3 below. The NPPF does not define what precisely is meant by ‘sprawl’ and ‘encroachment’. To assist the assessment of land against these tests, the following dictionary definitions (Cambridge Dictionaries On-line<sup>2</sup>) are used:

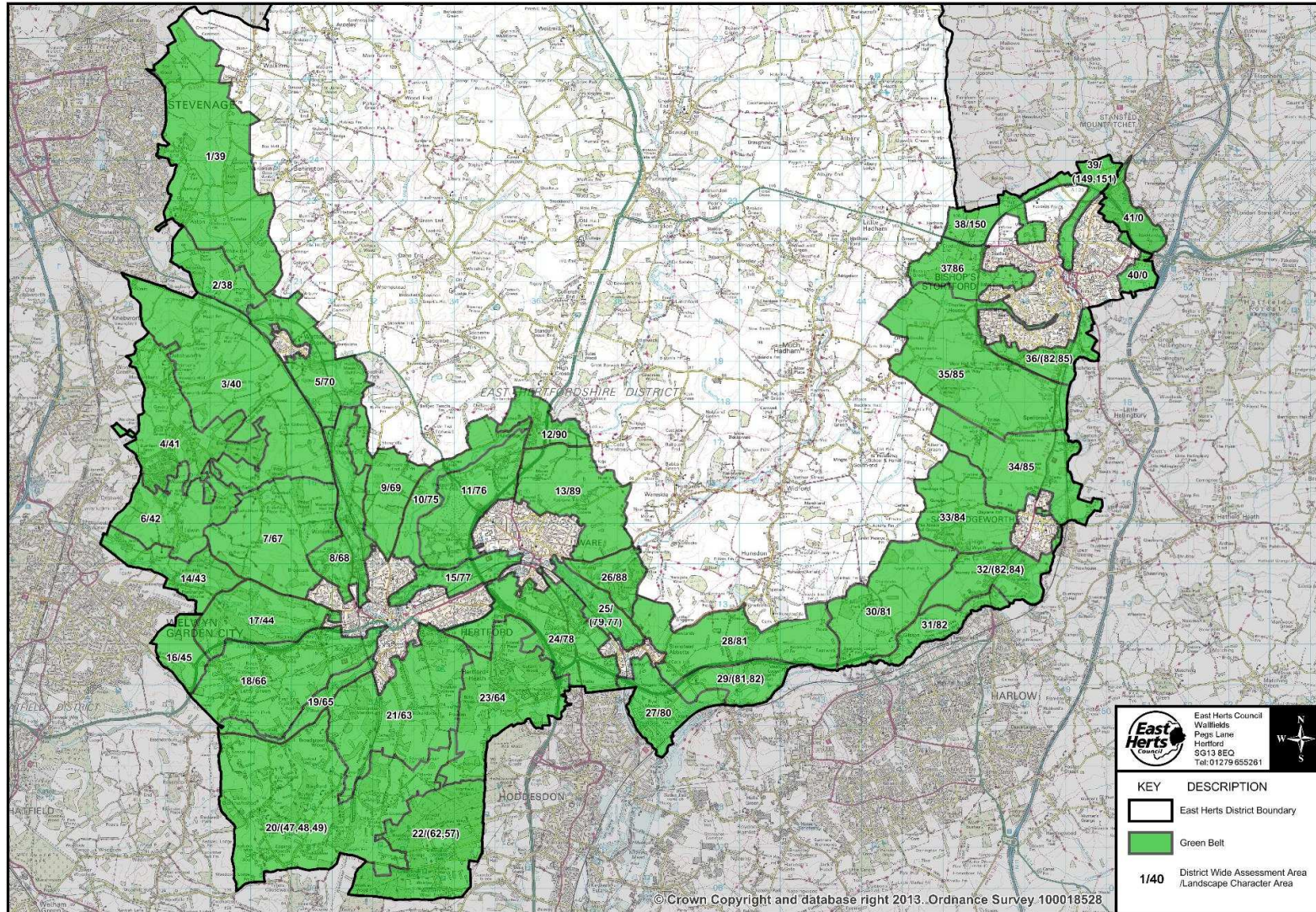
- Sprawl: *“the disorganised and unattractive expansion of an urban or industrial area into the adjoining countryside”*
- Encroachment: *“to advance gradually beyond usual or acceptable limits”*

2.2.6 With regards to the first purpose – to check the unrestricted sprawl of large built-up areas, the nature of East Herts is that of market towns with satellite villages located close to the towns in order to utilise the town’s services. In many cases, the Green Belt designation has prevented these villages from growing. However, the NPPF emphasis is on preventing the unrestricted sprawl of large built-up areas. As such, while it may be necessary to mention villages in some locations, the emphasis in this assessment is on large built-up areas, i.e. the four towns within the Green Belt, with East Herts and adjoining towns.

---

<sup>2</sup> <http://oxforddictionaries.com>

Map 2.1: District Wide Assessment Areas with Corresponding Landscape Character Assessment Area



- 2.1.7 With regards to the second purpose – to prevent neighbouring towns from merging into one another, it is necessary to consider not only the towns but also the villages that lie between. While the emphasis is on towns and large built-up areas, it is necessary to consider the impact development may have on merging or encroaching upon the villages that lie in proximity to the towns. It would not be appropriate to ignore these villages simply because the purpose is about preventing the merging of towns, particularly as part of the character of the district is the relationship between the historic market towns and its satellite villages.
- 2.1.8 With regards to the third purpose – to assist in safeguarding the countryside from encroachment, it is necessary to consider whether there are any sites of nature conservation value within the areas being assessed and the nature of the countryside, its openness and accessibility. The countryside immediately adjacent to towns is the most accessed countryside and therefore has considerable value for recreational, health and educational purposes. Encroachment, as the definition says is to advance beyond usual or acceptable limits. Development located too close to sites of nature conservation value may cause demonstrable harm or compromise the vitality of the asset, i.e. going beyond the acceptable limit of that asset.
- 2.1.9 Part of achieving this purpose is therefore to define limits within which development may be acceptable. In some locations, the lack of any definable boundary limits may strengthen the role of the Green Belt, as without the Green Belt designation, there may be no other method of preventing development encroaching into the countryside. In other locations however, the lack of an identifiable boundary to limit development may weaken the strength of the Green Belt as one defining feature of a Green Belt is its permanence. The gradual encroachment of development into a location with no definable boundary to limit development could undermine the permanence of the Green Belt, which in turn acts as precedence for more development.
- 2.1.10 For the purposes of a high-level review, there is limited value in assessing whether there are clear boundaries to development as no decision has been made as to the location or possible scale of development. Where clear boundaries exist these have been mentioned in the commentary. Areas that have hard natural or man-made boundaries are likely to be more successful in retaining their permanence than boundaries based on moveable river courses or intermittent or unprotected hedgerows. This part of the review has been informed by the Criteria-Based Assessments carried out for Chapter 3 of the Strategy Supporting Document, which used an initial scale assumption and looked in more detail at particular locations. Part 2 of the Green Belt Review will contain a more detailed boundary assessment of specific areas of search.
- 2.1.11 With regards to the fourth purpose – to preserve the setting and special character of historic towns, there are few locations where development on the edge of a town or urban area will affect the historic core or Conservation Area of the district's historic market towns, as each historic core has been surrounded over time by urban development of various ages, which often bear no visible resemblance to the historic core. The setting and special character

of a location may be subject to different interpretation, as each town would be unique. For some locations it would be its setting within a particular landscape, or the urban form as shaped by physical features, such as rivers or geological features, and in more recent years by the constraints caused by man-made features such as roads or railways. For some locations, the evolution of a town has been influenced by large landholdings such as country-house estates or farms. There are several Historic Parks and Gardens, Scheduled Monuments, Conservation Areas and Listed Buildings across the district, often within or in close proximity to towns which also influence the setting and special character of a town. The Landscape Character Assessment has been used to inform this purpose.

2.1.12 With regards to the fifth purpose - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, at this level, there is limited use in assessing the role of an area in assisting in urban regeneration as the Green Belt as a whole contributes towards this purpose by limiting the available alternative development sites outside the urban area, thereby prioritising the use of previously developed sites within the urban area. Therefore, as it would be somewhat arbitrary to claim that a particular part of the Green Belt would contribute more to this purpose than another, each area would be given the same rating. For these reasons this criterion has not been used in the assessment here.

2.1.13 There are very few remaining large ‘regeneration’ sites in the four East Herts towns surrounded by Green Belt, with exceptions being the Bishop’s Stortford Goods Yard and Mead Lane, Hertford. It could be argued that the Green Belt plays a role in relation to regeneration of Stevenage and Harlow, and Welwyn Garden City, where the New Town legacy has resulted in small areas of industrial decline. These New Towns are relatively constrained, creating additional pressure on Green Belt development in order to act as a catalyst for regeneration.

Table 2.3: Matters considered for each Green Belt purpose

Purpose	Matters Considered
1. To check the unrestricted sprawl of large built-up areas	What role does the location play in preventing urban sprawl? <ul style="list-style-type: none"> <li>• Is there evidence of existing ribbon development or non-compact development?</li> </ul>
2. To prevent neighbouring towns merging into one another	What role does the location play in preventing towns or urban areas from merging? <ul style="list-style-type: none"> <li>• Would a reduction in the gap between urban areas or towns compromise the openness of the Green Belt land?</li> <li>• Are there features which could continue to perform this role?</li> </ul>
3. To assist in safeguarding the countryside from encroachment	<ul style="list-style-type: none"> <li>• Are there clear strong features that could provide a robust Green Belt boundary to restrict sprawl and prevent encroachment in the long term?*</li> <li>• Are there already significant urbanising influences?</li> </ul>

	<p>Has there already been encroachment by built development?</p> <ul style="list-style-type: none"> <li>• Are there features of nature conservation value that would be harmed by further encroachment?</li> <li>• Are there opportunities for accessing the wider countryside beyond settlements that would be compromised by development?</li> </ul> <p>*This aspect will be assessed at a high level as part of the Criteria-based Assessment in the Strategy Supporting Document and in the Detailed Site Assessments in Part 3.</p>
4. To preserve the setting and special character of historic towns	<p>Are there views and links to the historic centres?</p> <ul style="list-style-type: none"> <li>• Would development compromise the quality of the historic core or Conservation Area within a settlement?</li> </ul> <p>Does the land have an impact on the special character of the town?</p> <ul style="list-style-type: none"> <li>• Would development detrimentally alter the shape and form of a historic settlement, where this is an important part of the character and setting of a town?</li> <li>• Does the land form part of a gateway into a town?</li> <li>• Does the area contain Scheduled Monuments, Areas of Archaeological Significance or Historic Parks and Gardens that would need to be considered in any development?</li> </ul>

2.1.14 Each area is given a score of red, amber or green to illustrate its contribution to the Green Belt purposes as illustrated in Table 2.4 below. At this stage the assessment seeks to highlight whether there are significant constraints and to indicate where further detail will be necessary at later stages. This colouring approach is considered to be more accessible than a complex scoring system, which is more appropriate at the detailed level assessment stage. For this high-level assessment it is more appropriate to include an explanation or commentary and to highlight where further issues may need to be considered later.

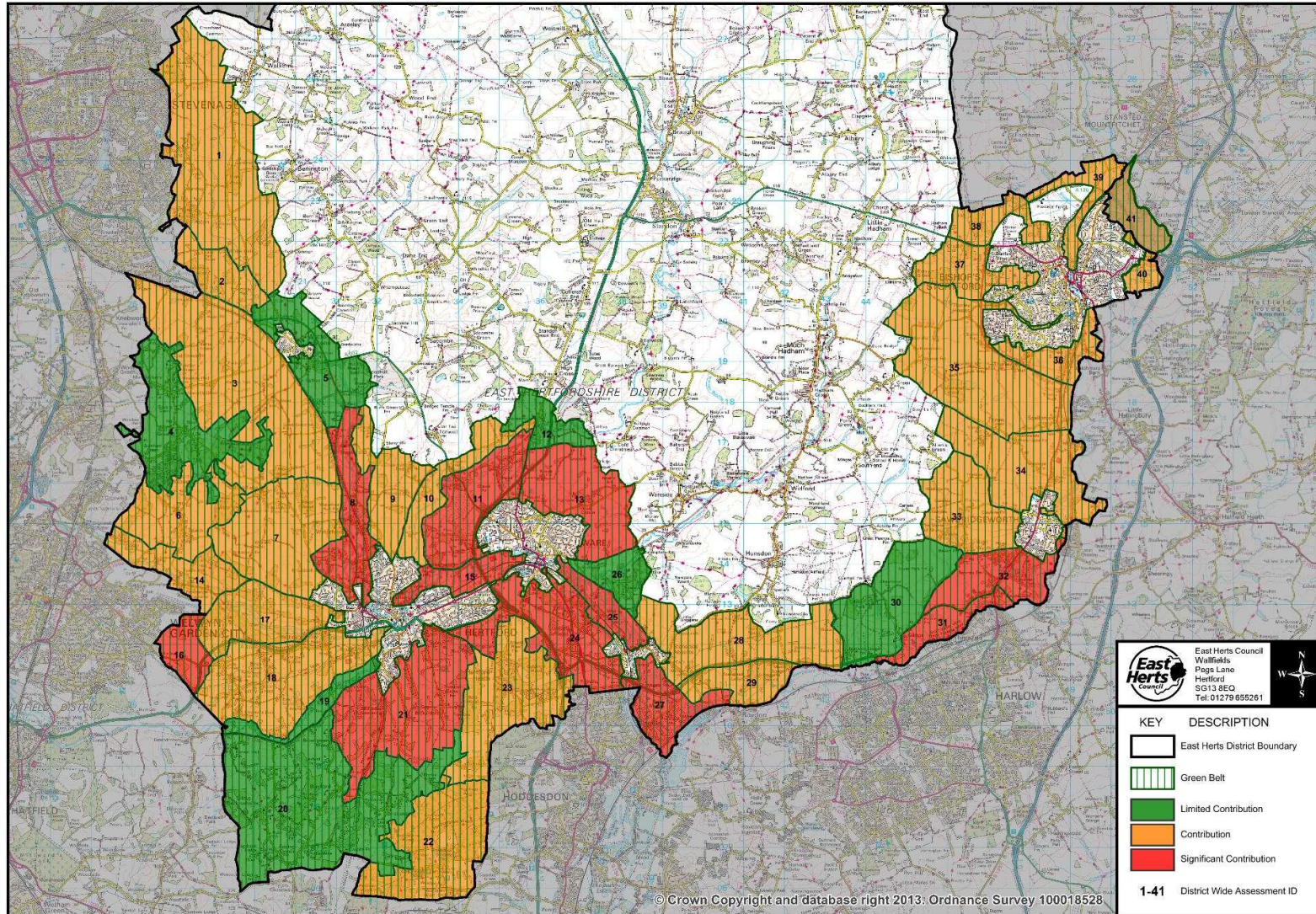
Table 2.4 District-Wide Green Belt Review Template

District-Wide Area ID	Related LCA ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
ID	ID and description	Limited Contribution	Contribution	Significant Contribution	Contribution

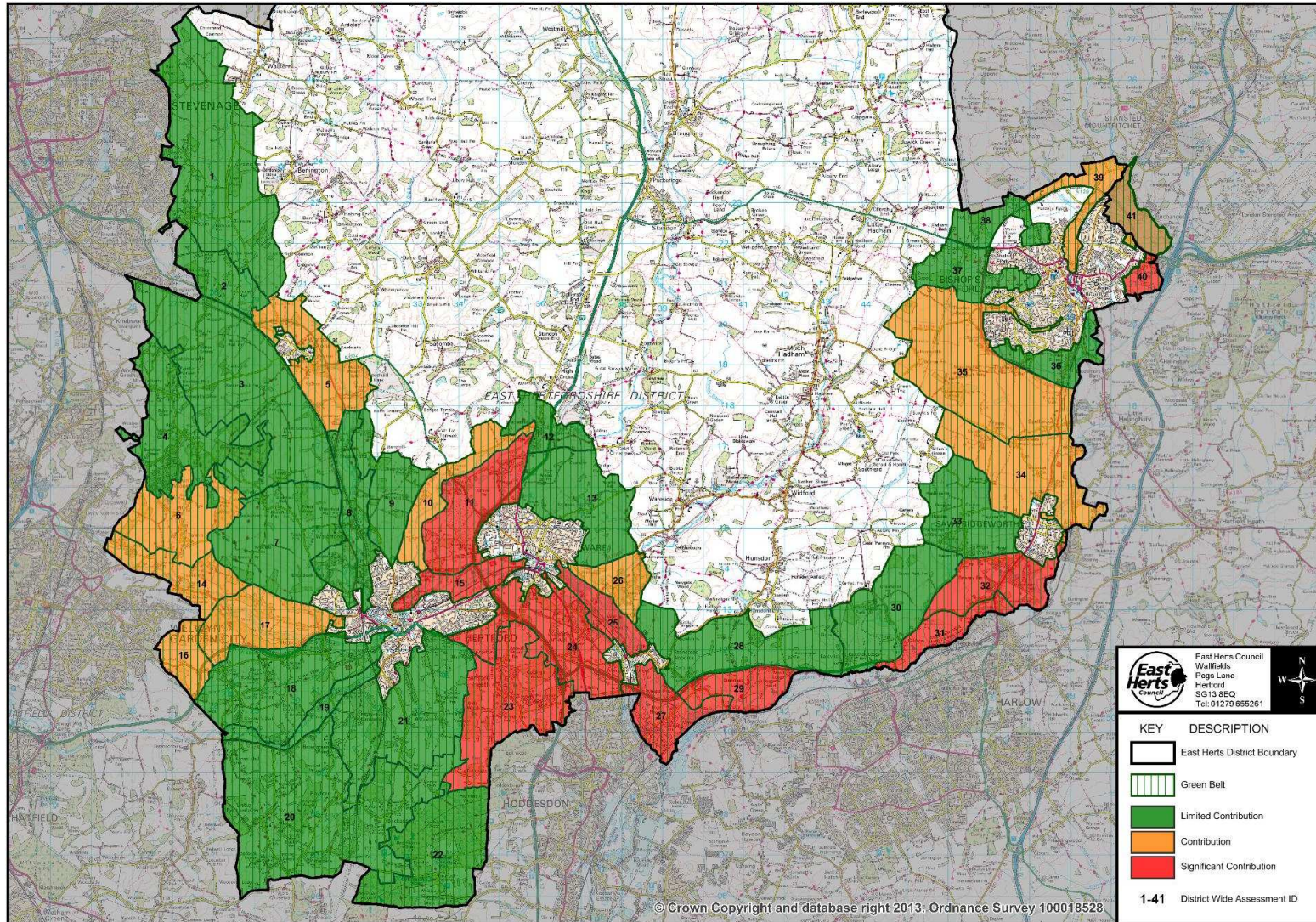
2.1.15 This district-wide review at this stage does not seek to definitively state whether a location should be discounted for further assessment, rather it informs the process of choosing and refining areas of search for further assessment. The results of this high-level district-wide assessment are contained in **Appendix 1**. The following four maps summarise the results of each purpose assessment.



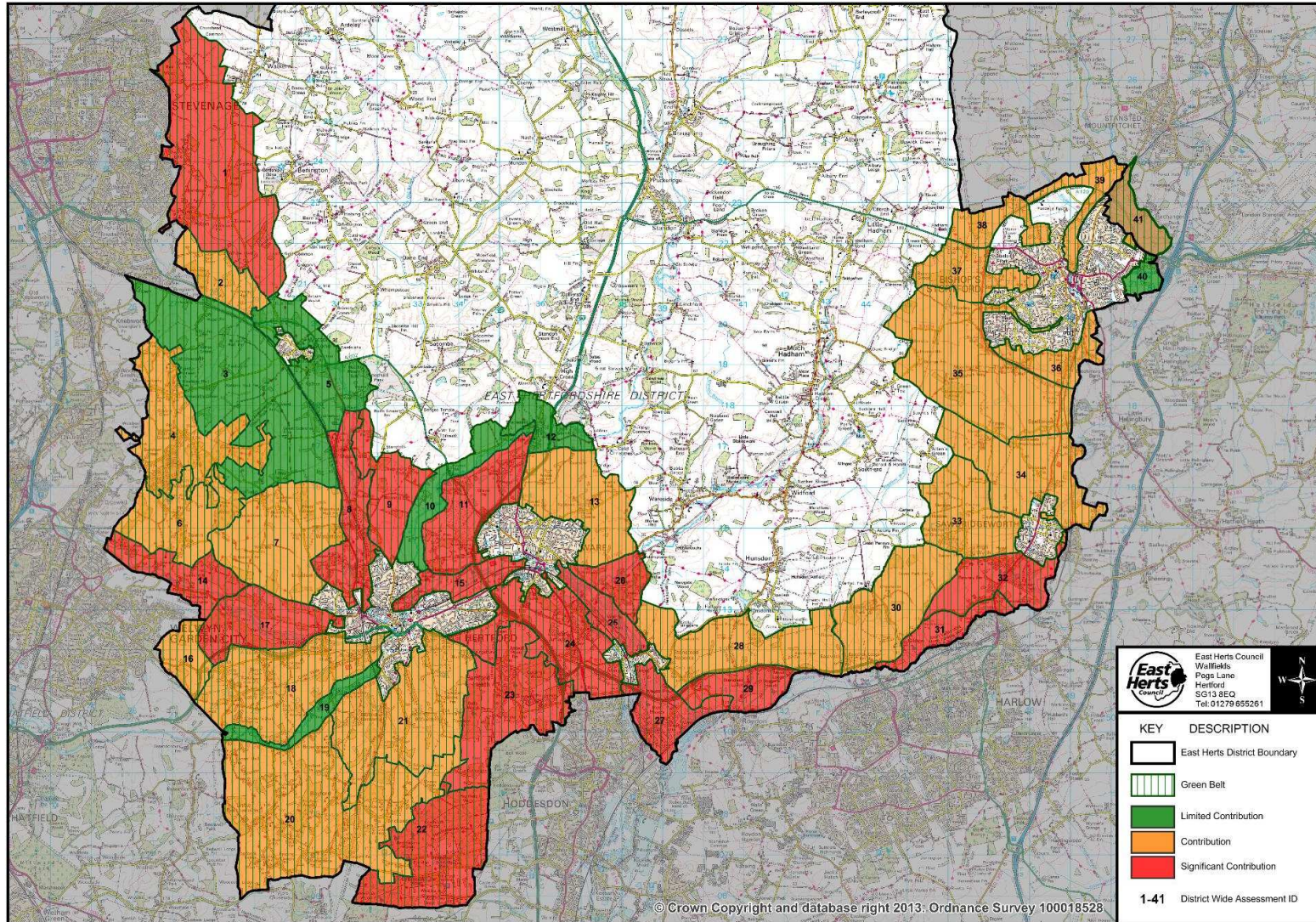
Map 2.2: Purpose 1 - Check the Unrestricted Sprawl of Large Built-up Areas



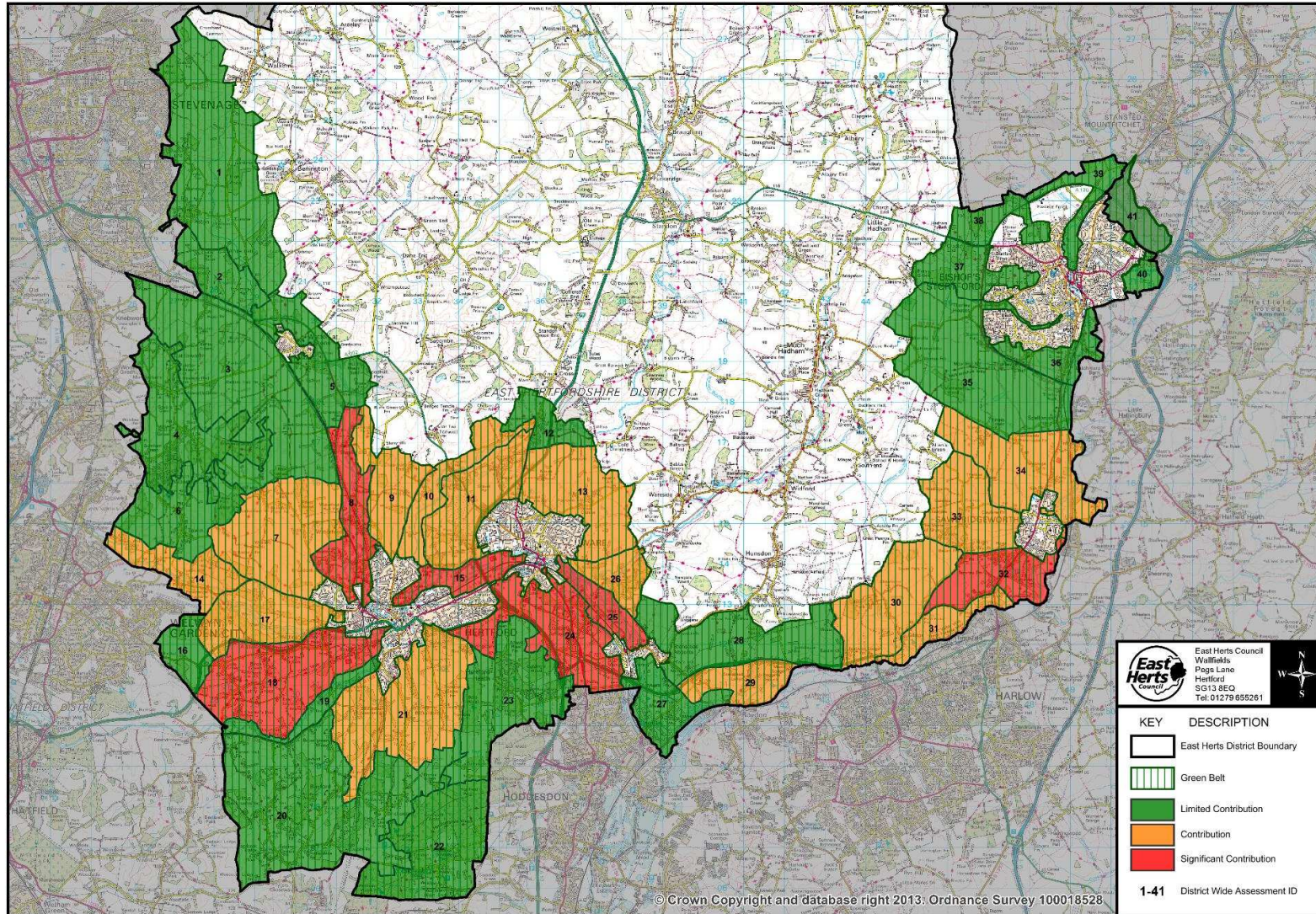
Map 2.3: Purpose 2 - Prevent Neighbouring Town Merging into One Another



Map 2.4: Purpose 3 - Assist in Safeguarding the Countryside From Encroachment



Map 2.5: Purpose 4 - Preserve the Setting and Special Character of Historic Towns



## Appendix 1: Results of Part 1 – High Level Review

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
	Key:	Limited Contribution	Contribution	Significant Contribution	
1	39 – Middle Beane Valley	<u>Contribution</u> - This area of Green Belt immediately abuts the built-up area of Stevenage, and contains some residential estates and dwellings which although planned have effectively breached the obvious boundary of Gresley Way. The Green Belt has prevented further eastward development and therefore contributes to preventing unrestricted sprawl.	<u>Limited Contribution</u> - Whilst there are no towns to the east of Stevenage, there are hamlets, isolated dwellings and small villages that would be encroached upon or enveloped should development spread eastwards from the town.	<u>Significant Contribution</u> - Gresley Way which runs along the eastern edge of Stevenage is the obvious boundary to development in this location, preventing built development extending up the west-facing valley slope. The residential estate off Edmonds Drive has already encroached eastwards of Gresley Way. This area contains not only several Wildlife Sites, but also a SSSI. It also contains the highly vulnerable chalk stream river and the wide Beane Valley landscape.	<u>Limited Contribution</u> - Stevenage is contained within a landscape bowl and development in this location would change that characteristic by extending up the valley sides. Development would be some distance away from the centre of the town or Old Stevenage. There are several Areas of Archaeological Significance within this location and several very old villages. Aston is largely covered by a Conservation Area, reflecting its age and architectural interest.
2	38 – Aston Estate Farmland	<u>Contribution</u> - This area of Green Belt immediately abuts the built-up area of Stevenage, and contains some hamlets and isolated dwellings extended along the A602. The presence of the golf course and floodplain along with Green Belt status has prevented further eastward development and therefore contributes to preventing unrestricted sprawl.	<u>Limited Contribution</u> - Whilst there are no towns to the east of Stevenage, there are hamlets, isolated dwellings and small villages that would be engulfed should development spread eastwards from the town.	<u>Contribution</u> - While the golf course is a highly managed landscape, nonetheless it is acknowledged as an appropriate use within the Green Belt. In addition to small woodlands, this land contains large manor house estates with associated buildings and farmlands with uniform field and road boundaries. The area contains some steep south-facing slopes which are highly visible, with only narrow lanes providing access through an otherwise very remote landscape despite its proximity to Stevenage.	<u>Limited Contribution</u> - Stevenage is contained within a landscape bowl and development in this location would change that characteristic by extending up the valley sides. Development would be some distance away from the centre of the town or Old Stevenage. The southern tip of Stevenage has extended along the A602. The majority of properties visible from the A602 are of a domestic scale or are clearly related to an agricultural holding.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
3	40 – Bramfield – Datchworth Sloping Farmland	<u>Contribution</u> - The north-western part of this area contributes to preventing the unrestricted sprawl of Stevenage southwards towards Knebworth, a large village. There has already been an elongation of Stevenage southwards along the A602, which acts as a clear boundary to growth.	<u>Limited Contribution</u> - This area does not contribute to preventing towns from merging as there is significant distance between Stevenage and its nearest towns of Hertford and Buntingford. This is one of the few areas which contain no settlements, only farm holdings. There are however, villages on the edge of this area which may have expanded without the Green Belt designation.	<u>Limited Contribution</u> - This area contains undulating and gently sloping arable farmland with no settlements, only isolated farm dwellings. There are many areas of woodland ranging in size, nearly all ancient woodland covered by local Wildlife Site status, often cut into by agricultural holdings. This area is widely visible from and to surrounding areas and is a rather exposed landscape lacking vertical elements. The crematorium is an anomaly with little evidence of integration with its surroundings. There is a clear boundary to development in the railway line which runs across the north of the area.	<u>Limited Contribution</u> - The urban area of Stevenage has already extended southwards along the A602 and the railway line towards the District boundary. These residential estates largely replicate the New Town style but are some distance from the centre of Stevenage. There are many areas of archaeological significance, a Scheduled Ancient Monument and a Roman Road dissects the area east to west. This area wraps around the south of Watton-at-Stone village where Green Belt status has helped to prevent the southward expansion of the village.
4	41 – Bramfield Wood, Tewin Wood and Datchworth Uplands	<u>Limited Contribution</u> - This area contains several settlements set around extensive village greens or within dense woodland. Although these settlements are classified as villages, they are large villages which would have significant scope and demand to grow if it were not for the Green Belt designation. The villages act like beads on a string between Welwyn Garden City and Stevenage. There is already a degree of ribbon development between the villages and with little much more growth they could become one conglomeration.	<u>Limited Contribution</u> - This area does not contribute to preventing towns from merging. However, the Green Belt has prevented villages surrounding this area from expanding into this area.	<u>Contribution</u> - The majority of this area is densely wooded with many local Wildlife Sites including Bramfield Woods, particularly noted for its high level of biodiversity. In most cases woodland would be a potential boundary to development. However, Burnham Green is a village deliberately set within Hopkins Wood. Because the area is heavily wooded, views into and out of the settlements here are screened and the character is one of tranquillity apart from during peak time, when vehicle noise disturbs the locality. Due to this area's proximity to Stevenage and the A1(M), there is an underlying sense of the encroachment of urban influence.	<u>Limited Contribution</u> - There are no large settlements in this area, though there are many areas of archaeological significance and a Roman Road which dissects the area east to west. This area wraps around the Tewin Wood and Datchworth settlements where Green Belt status has helped to prevent the expansion of the villages.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
5	70 – Woodhall Park and Watton-at-Stone Slopes	<u>Limited Contribution</u> - There is no large built-up area in this location, however, this area wraps around the north and eastern edge of Watton-at-Stone village. The A602 bypass wraps around the north-east of the village and a railway line runs to the west. These features are clear boundaries to limit development.	<u>Contribution</u> - Although Watton-at-Stone is a village and not a town, its location approximately midway between Hertford and Stevenage is a key feature of the A602 corridor. Development to the north-west of the village and the south-east of Stevenage would reduce the distance of the strategic gap between the town and the village.	<u>Limited Contribution</u> - Despite the bypass and railway line forming clear boundaries to development, the village of Watton-at-Stone remains compact and tightly defined. There are several small local Wildlife Sites, but access to and from the village and the wider countryside is limited by the bypass and the private land holdings.	<u>Limited Contribution</u> - While Watton-at-Stone is a village and not a town, nonetheless it is largely covered by Conservation Area status and is surrounded by historic estates and Areas of Archaeological Significance.
6	42 – Tewin, Dawley and Lockley Estate Farmland	<u>Contribution</u> - This area contains the village of Tewin, which is removed from the Green Belt with a tight village boundary. However, the form of the village is not compact, consisting of a north-south ribbon development. While Tewin is not a large built-up area, its proximity to Welwyn Garden City makes this area important in preventing further non-compact development and the northwards expansion of Welwyn Garden City.	<u>Contribution</u> - The Green Belt in this location assists in preventing the northward growth of Welwyn Garden City.	<u>Contribution</u> - There are several small local Wildlife Sites in this area. In addition, this area contains a Local Nature Reserve to the north of Tewin village. The area is reasonably close to the A414 and is affected by a loss of tranquillity. In most cases woodland would be a potential boundary to development. However, there are examples of villages in proximity to this area which are set within woodland.	<u>Limited Contribution</u> - This area has been largely influenced by the occupation and management of large manor house estates. Tewin itself contains a Conservation Area and bares the marks of the Cowper family estate who owned much of the area between the 18th to 20th centuries. However, the area makes a limited contribution to preserving the setting of Welwyn Garden City, which is largely framed to its north by the River Mimram.
7	67 – Bramfield Plain	<u>Contribution</u> - This area abuts in part the western edge of the built-up area of Hertford. As such it has a role in preventing the growth of the town in this direction.	<u>Limited Contribution</u> - While, this area contains the small village of Bramfield, there is sufficient distance between Hertford and surrounding towns of Welwyn Garden City and Stevenage that this area alone has a limited contribution in this respect.	<u>Contribution</u> - This area contains several local Wildlife Sites and pockets of ancient woodland. The area is open with long views over farmland and river valleys. This gives the impression of remoteness despite the areas' proximity to Hertford. Apart from the small village of Bramfield there is no evidence of encroachment, but there are several features which could be used to create a new boundary to development.	<u>Contribution</u> - Although this area forms a gateway into Hertford from the west, the area is removed from the historic core of the town by 20th Century development. Not only has the shape of Hertford's growth in this direction been influenced by the river courses, but also by the historic Goldings estate in the neighbouring area. The B1000 has also contributed to the spreading of Hertford westwards along this road. Without the Green Belt designation, there would likely be more growth in this location. There are also several Areas of Archaeological Significance in this area.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
8	68 – Lower Beane Valley	<u>Significant Contribution</u> - The Green Belt designation in this area contributes to preventing the growth of Hertford to the north along with other land-based designations such as floodplains and designated sites of nature conservation interest. Where the Green Belt extends into the town itself in the form of a green finger, this land acts as open space for recreational purposes and the Green Belt designation has helped to prevent sprawl of adjoining residential estates into the green finger.	<u>Limited Contribution</u> - Whilst this area contains several small villages which could be subsumed into any northern growth of Hertford, there is sufficient distance between Hertford and other towns or the large village of Watton-at-Stone, that this area alone has a limited contribution in this respect.	<u>Significant Contribution</u> - This area consists of a narrow flat floodplain with steeply rising valley sides. Being a river environment there are many local Wildlife Sites and a Local Nature Reserve of considerable local value. The area is well-linked to the urban area of Hertford through the Hertfordshire Way which in this location follows the River Beane through a series of small villages and a converted manor estate.	<u>Significant Contribution</u> - The former Goldings Estate once a large manor estate with landscaped grounds is now converted into a residential development, but the estate and the villages of Waterford and Stapleford retain their historic character, which together frame the approach to Hertford from the north. There are several Areas of Archaeological Significance in this area, particularly to the north. Where the Green Belt extends into the town itself in the form of a green finger, this land extends into the town centre Conservation Area and has helped shape the growth and form of the town.
9	69 – Stonyhills	<u>Contribution</u> - The southern most tip of this area abuts the northern most built-up part of Hertford, where there has been historic and ongoing mineral extraction. This mineral activity has shaped the northern growth of Hertford as much as the Green Belt designation. Once this mineral working has completed this land will have significant pressure to accept built development.	<u>Limited Contribution</u> - Whilst this area contains several small villages, there is sufficient distance between Hertford and other towns or the large village of Watton-at-Stone that this area alone has a limited contribution in this respect.	<u>Significant Contribution</u> - There are extensive footpaths through this area which contains part of the Waterford Heath Local Nature Reserve and several small Local Wildlife Sites. Much of the land here is becoming more urbanised through mineral workings, allotments and highway paraphernalia.	<u>Contribution</u> - The southern most part of this area abuts the northern most part of Hertford and therefore contributes to preserving the setting of the historic town. However, much of the land here is becoming more urbanised through mineral workings, allotments and highway paraphernalia and is also some distance from the historic core of the town.
10	75 – Lower Rib Valley	<u>Contribution</u> - Where this area abuts the northern edge of Bengoe, north Hertford, it contributes to preventing unrestricted sprawl. However, the River Rib is the dominant landscape feature here which limits development perhaps more so than the Green Belt designation.	<u>Contribution</u> - The northward expansion of Hertford into this area would reduce the gap between the towns of Hertford and Ware, due to the way the towns are located next to each other with Ware latitudinally further north than Hertford.	<u>Limited Contribution</u> - This area contains the floodplain of the River Rib, a tributary of the River Lea. However, there are no environmental designations within this area and public access is limited.	<u>Contribution</u> - Where the southern edge of this area abuts the built-up area of the north of Hertford it contributes towards maintaining the relative compactness of the town.



East Herts District-Wide Green Belt Review: Part 1

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
11	76 – Ware Parklands	<u>Significant Contribution</u> - This area is key in restricting the sprawl of the neighbouring towns of Hertford and Ware, which has already occurred in some places.	<u>Significant Contribution</u> - This area is key in preventing the two towns of Ware and Hertford from merging together as has already happened along the Ware Road. However, the A10 which runs alongside the western edge of Ware forms a strong boundary to development.	<u>Significant Contribution</u> - The landscape in this area is dominated by current and historic mineral workings, though these are largely screened by vegetation. There are two small areas designated as Sites of Special Interest of geological merit near to Hanbury Manor. There are also several woodland areas which although not designated, are important features. There have been many conversions of farm holdings into small residential estates within this area, representing encroachment. The A10 which runs tightly alongside the western edge of Ware forms a strong boundary to development of the town itself.	<u>Contribution</u> - This strategic gap between Ware and Hertford is a key part of the character and relationship between the two towns. Despite extensive mineral extraction, the historic pattern of this area is still evident. There are two large areas of parkland with manor houses, although Hanbury Manor has been converted to a golf course. The A10 which runs tightly alongside the western edge of Ware forms a strong boundary to development of the town and has contributed to preserving the relatively compact nature of Ware more so than Green Belt designation in this area.
12	90 – Middle Rib Valley	<u>Limited Contribution</u> - This area contains the two villages of Wadesmill and Thundridge, which although separate villages, have little visible separation. Although not large built-up areas, the Green Belt designation has contributed to preventing sprawl and maintaining the separate identities of the two villages. These villages lie in close proximity to the north of Ware.	<u>Limited Contribution</u> - The Green Belt designation has a role in preventing the two villages of Thundridge and Wadesmill from merging into one another physically. This purpose relates however to towns and there is sufficient distance between the two villages and the north of Ware. The A10 also acts as a barrier to development.	<u>Limited Contribution</u> - There are few Local Wildlife Sites within this area and with the exception of Youngsbury Historic Park and Garden there are few features of note. The landscape is dominated by a very open and visible south-east facing slope. Access through the area is generally very good.	<u>Limited Contribution</u> - This area contains the Historic Park and Garden at Youngsbury and contributes to preserving the setting of this parkland and the two villages of Thundridge and Wadesmill. However, the distance between this area and Ware to the south is sufficient that this area has no contribution to preserving the setting of Ware.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
13	89 – Wareside – Braughing Uplands	<b>Significant Contribution</b> - This area has a significant contribution in preventing the unrestricted sprawl of development of Ware as the area wraps around the north and eastern edges of Ware.	<b>Limited Contribution</b> - There are no towns to the north or east of Ware. The Green Belt does however, contribute to preventing the eastwards and northwards growth of Ware which would reduce the gap between the town and the villages of Thundridge, Wadesmill and Wareside.	<b>Contribution</b> - There are few Local Wildlife Sites within this area and with the exception of Fanhams Hall and parkland there are few features of note. However, the landscape is dominated by a very open and visible south-east facing slope and access through the area is generally very good.	<b>Contribution</b> - The area, where it abuts Ware contributes to maintaining the relatively compact nature of the town. However, the town itself has grown northwards through the late twentieth Century, removing any connection with the historic core of the town. The Green Belt does however, prevent further northwards growth, contributing to preserving the Historic Park and Garden at Fanhams Hall.
14	43 – Mimram Valley Parklands	<b>Contribution</b> - This area contains much of the River Mimram with its relatively steep south-facing valley slopes along with the B1000 and as such, these features contribute to preventing the northwards growth of Welwyn Garden City as much as the Green Belt status.	<b>Contribution</b> - The Green Belt in this location assists in preventing the northward growth of Welwyn Garden City towards Tewin. There may be sufficient distance between Welwyn Garden City and settlements to the north, however, this area contributes to preventing the loss of the gap between Welwyn Garden City and Hertford.	<b>Significant Contribution</b> - There are several small local Wildlife Sites and Areas of Archaeological Significance in this area. In addition, this area contains a Site of Special Scientific Interest and a Historic Park and Garden. The proximity of the area to the B1000 affects the tranquillity of the area. The Panshanger Park to the south of this area and the footpaths and towpaths of the River Mimram are well used points of access to the wider countryside between Hertford and Welwyn Garden City.	<b>Contribution</b> - The River Mimram and the B1000 along with other land-based designations contribute to preserving the historic setting of Welwyn Garden City as much as Green Belt status.
15	77 – Kingsmead and Hartham Common Floodplain	<b>Significant Contribution</b> - This area is key in restricting the sprawl of the neighbouring towns of Hertford and Ware, which has already occurred in some places.	<b>Significant Contribution</b> - This area is key in preventing the two towns of Ware and Hertford from merging together as has already occurred along the Ware Road.	<b>Significant Contribution</b> - This area contains a large Local Wildlife Site which is also a Local Nature Reserve, one of four flagship reserves in the district. It is also a well-accessed popular green link between the two towns.	<b>Significant Contribution</b> - This area is important in influencing the historic growth and current shape of the two towns. The western part of this area lies within the Hertford Town Centre Conservation Area and is a key feature of the centre of Hertford. The eastern part of this area lies within the Ware Town Centre Conservation Area and as such is a key feature of this part of Ware.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
16	45 – Welwyn Fringes	<b>Significant Contribution</b> - This area abuts the built-up area of Welwyn Garden City and as such plays a significant contribution in preventing the outward growth of the town to the north and east as much as the physical landscape constraints in the area.	<b>Contribution</b> - This area lies between Welwyn Garden City to the west and Hertford to the east, and as such development would reduce the distance and the strategic gap between the two towns.	<b>Contribution</b> - The Panshanger estate has encroached into countryside alongside the Panshanger Aerodrome. The proximity of the area to the B1000 and the A414 affects the tranquillity of the area. Although the Panshanger Park lies to the east, access through this area to the Park is fairly limited. This area contains two reasonably sized local Wildlife Sites and is almost entirely covered by several Areas of Archaeological Significance.	<b>Limited Contribution</b> - The Panshanger estate of Welwyn Garden City is one of more recent parts of the town, some distance from the historic centre of the New Town.
17	44 – Panshanger Parkland	<b>Contribution</b> - This area lies between Welwyn Garden City and Hertford. Where it abuts the edge of built-up area of Hertford it contributes to preventing the westward growth of Hertford.	<b>Contribution</b> - This area lies between Welwyn Garden City to the west and Hertford to the east, and as such development would reduce the distance and the strategic gap between the two towns.	<b>Significant Contribution</b> - Nearly the whole area is covered by Panshanger Park, a designated local Wildlife Site and Historic Park and Garden. Access through the park is best achieved from the urban edge of Hertford. The Park contains many ancient trees of significant historic and aesthetic value.	<b>Contribution</b> - The area is a relic of historic parkland though the original park landscape and structures have been almost entirely removed. There is an ongoing plan for mineral extraction and restoration. Although this area forms a gateway into Hertford from the west, the area is removed from the historic core of the town by 20th Century development. It does however, contribute to the evolving shape of the town spreading westwards along the B1000.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
18	66 – Cole Green and Hertingfordbury Settled Farmland	<p><u>Contribution</u> - The eastern most part of this area abuts the south western edge of Hertford and as such helps to prevent the growth of Hertford in this direction. However, in this location, the village of Hertingfordbury has had an urbanising influence, leaving little land between the village and the town undeveloped. The floodplain and the A414 have contributed to preventing growth as much as the Green Belt in this location. The Green Belt is important here in preventing further growth of Hertford sprawling into Hertingfordbury. Where the Green Belt extends into the town itself in the form of a green finger, this land acts as open space for recreational purposes and the Green Belt designation has helped to prevent sprawl of adjoining residential estates into the green finger.</p>	<p><u>Limited Contribution</u> - Whilst this area lies between Welwyn Garden City to the west and Hertford to the east, there is sufficient distance between the two towns that this area alone has a limited contribution in this respect.</p>	<p><u>Contribution</u> - There are several small Local Wildlife Sites throughout this area which is dissected by the Cole Green Way, an abandoned railway line now a Local Wildlife Site and important public right of way and Sustrans route. There are several small villages along well-used roads which run parallel to the A414, and as such, the area is affected by constant low-level noise. There is already a degree of encroachment from Hertford and the village of Hertingfordbury into this area.</p>	<p><u>Significant Contribution</u> - The eastern edge of this area extends into the Hertford Town Centre Conservation Area in the form of a green finger, and as such has a role in preserving the setting of the town and the shape of its growth. Physical constraints have also contributed to this role, such as flood plains and the railway line viaduct. Two of the villages in this area are Conservation Areas and there are several large Areas of Archaeological Significance.</p>
19	65 – Middle Lea Valley West	<p><u>Limited Contribution</u> - Only a small part of this area lies close to Hertford, but built development is influenced more by the flood plain here than by Green Belt Designation.</p>	<p><u>Limited Contribution</u> - Whilst this area lies between Welwyn Garden City to the west and Hertford to the east, there is sufficient distance between the two towns that this area alone has a limited contribution in this respect.</p>	<p><u>Limited Contribution</u> - This area contains the flat-bottomed valley of the River Lee/Lea, most of which is also a Local Wildlife Site. The flood plain is more of a constraint to development here than Green Belt designation.</p>	<p><u>Limited Contribution</u> - Although this area abuts the south western edge of Hertford it is somewhat removed from the historic core of the town and as such has a limited role in preserving the setting of the town, which in this location is more defined by flood plains and the railway line viaduct.</p>

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
20	47, 48, 49 – Essendon – Brickendon Farmed Slopes, West End – Brickendon Wooded Slopes, Little Berkhamsted Ridge Settlements	<u>Limited Contribution</u> - Three LCA have been grouped together for their common features of historic villages within woodland settings with undulating slopes and some steep banks around small plateaus where arable land is dominant. These areas are some distance from larger settlements but the Green Belt designation has contained the growth of villages and hamlets.	<u>Limited Contribution</u> - Whilst this area lies between Welwyn Garden City to the west, Hertford to the east and Broxbourne towns to the east, there is sufficient distance between the towns that this area alone has a limited contribution in this respect.	<u>Contribution</u> - This area contains many large Local Wildlife Sites, predominantly ancient woodland of the Wormley-Hoddesdonpark Woods complex and river valleys. There has been some encroachment through isolated dwellings and the ribbon development expansion of the villages of Bayford and Brickendon.	<u>Limited Contribution</u> - This area has a limited role in preserving the setting of historic towns, however there are several villages covered by Conservation Area status and several large Areas of Archaeological Significance.
21	63 – Bayfordbury, Brickendonbury and Balls Parkland	<u>Significant Contribution</u> - This area immediately abuts the southern edge of Hertford, where there is considerable pressure to expand the town. As such, this area plays a significant contribution in preventing the unrestricted sprawl of Hertford.	<u>Limited Contribution</u> - The distance between the south of Hertford and the nearest town (Hoddesdon) to the south-east is sufficient that this area has a limited contribution in this respect. There are however several isolated farmsteads and a small hamlet within this area.	<u>Contribution</u> - There are many Local Wildlife Sites in this area, predominantly ancient woodlands and roadside hedges and verges. Because the historic parklands have been institutionalised there is relatively little public access through this area. The edge of Hertford is reasonably well screened by vegetation.	<u>Contribution</u> - The southern estates of Hertford are somewhat disconnected from the historic core of the town, being largely of 1960's construction. However, the Green Belt here has helped to protect the many historic estates that have shaped the growth of the town to the south. The Historic Park and Garden of Bayfordbury and of Balls Park form dominant landscape features. Other Areas of Archaeological Significance are situated around historic manor houses and parklands, which are now converted into residential or employment uses.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
22	62, 57 – Broxbourne Woods Complex, Thunderfield Ridges	<u>Contribution</u> - This area contains a small part of LCA 57 which is somewhat different in character to Area 62 but in Green Belt terms plays a similar role in forming a strategic belt between Hoddesdon (and its westward sprawl along Hammond Street) and villages to the south of Hertford. Without the nationally important woodland and Green Belt designation it is likely that residential development south of this area within Broxbourne Borough would be greater than at present.	<u>Limited Contribution</u> - The distance between the south of Hertford and the nearest town (Hoddesdon) to the south-east is sufficient that this area has a limited contribution in this respect. There are however a few isolated houses and the Paradise Wildlife Park local zoo within this area, which is a significant local attraction, with many urban features including parking areas. To the south of this area there is a small hamlet of large houses, often with paddocks in Wormley West End. These suburban features may well grow without the Green Belt designation.	<u>Significant Contribution</u> - There are many Local Wildlife Sites in this area which also contains the National Nature Reserve, Special Area of Conservation and Site of Special Scientific Interest at Wormley-Hoddesdonpark Woods, which is noted for its oak-hornbeam woodlands.	<u>Limited Contribution</u> - Although this area lies between Hoddesdon and Hertford and contains several dwellings, this area plays no role in preserving the setting of any historic towns.
23	64 – Hertford Heath	<u>Contribution</u> - Hertford Heath, although currently a Category 1 village which enables the village to grow through small infill developments within a defined boundary, a large amount of built development associated with the village lies outside of this boundary. The nature of this development has created an urban environment, particularly around Haileybury College. The Green Belt that abuts the edge of Hoddesdon along with the A10 prevents the urban expansion of Hoddesdon.	<u>Significant Contribution</u> - Although the A10 forms an obvious boundary to the westward growth of Hoddesdon, development is already proposed close to the A10 junction within Broxbourne Borough. The Green Belt in this location plays a significant role in retaining the gap between Hoddesdon and Hertford.	<u>Significant Contribution</u> - This area contains many large Local Wildlife Sites, a SSSI around Hertford Heath and several Local Nature Reserves, noted for their ancient woodland. The area is well connected with the surrounding area and the village of Hertford Heath is framed by its woodland blocks. Due to good road links and the large Haileybury College, the village lacks tranquillity through intensive activity associated with the school and link road between Hoddesdon and the south of Hertford along Mangrove Road.	<u>Limited Contribution</u> - The parts of Hoddesdon which abut this area are already built up to the local authority boundary and any further westward development would need to be within East Herts. However, this area plays a limited role in preserving the setting of a historic town as much of Hoddesdon has changed significantly in the last 30 years.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
24	78 – Great Amwell Ridge and Slopes	<u>Significant Contribution</u> - This area plays a significant contribution in preventing the unrestricted sprawl of Hertford, Ware and Hoddesdon as the area lies between the three towns where there is considerable pressure to grow. This area also contributes to preventing the unrestricted growth of Hoddesdon northwards where it would result in coalescence with the large village of Stanstead Abbots/St Margarets and the sprawling village of Great Amwell.	<u>Significant Contribution</u> - This area plays a significant contribution in preventing the unrestricted sprawl of Hertford, Ware and Hoddesdon as the area lies between the three towns where there is considerable pressure to grow. This area also abuts the large village of Stanstead Abbots/St Margarets and the sprawling village of Great Amwell, both covered by sizeable Conservation Areas.	<u>Significant Contribution</u> - There are several small Local Wildlife Sites in this area, however, the area immediately abuts the Lea Valley which contains sites of Ramsar, Special Protection Area and Site of Special Scientific Interest designations. The major road network and expanse of utilities makes this area a predominantly suburban rather than rural area. The area lacks tranquillity apart from alongside the river itself.	<u>Significant Contribution</u> - Where this area abuts the southern edges of Hertford and Ware, it contributes to preserving the setting of the two historic towns as separate settlements, which are relatively compact forms heavily influenced by river valleys.
25	79, 77 – Amwell Floodplain, part Kingsmead and Hartham Common Floodplain	<u>Significant Contribution</u> - This area covers the floodplain of the River Lea/Lee between the south of Ware and the large village of Stanstead Abbots/St Margarets. As such, it plays a significant role along with the River Lea/Lee Valley and its environmental assets of European importance, in preventing the unrestricted sprawl of both settlements.	<u>Significant Contribution</u> - This area covers the floodplain of the River Lea/Lee between the south of Ware and the large village of Stanstead Abbots/St Margarets. As such, it plays a significant role along with the River Lea/Lee Valley and its environmental assets of European importance, in preventing the southward growth of Ware and the northward growth of Stanstead Abbots/St Margarets.	<u>Significant Contribution</u> - This area contains the Lea Valley Amwell Quarry which is a Ramsar Site of European Importance covered by designation as a Site of Special Scientific Interest as well as a Local Nature Reserve.	<u>Significant Contribution</u> - Where this area abuts the southern edge of Ware and the northern edge of Stanstead Abbots/St Margarets, it contributes to preserving the setting of the two historic settlements, both of which contain sizeable Conservation Areas.
26	88 – Lower Ash Valley	<u>Limited Contribution</u> - Only a small part of this area lies adjacent to the eastern edge of Ware and as such has a limited role in preventing the unrestricted sprawl of the town. The majority of the area is covered by the flat bottomed valley of the River Ash with steep valley sides. This landscape prevents development more so than the Green Belt designation in this area.	<u>Contribution</u> - There are no towns to the east of Ware. However, if the landscape was not a greater constraint, this area would contribute to preventing the eastwards and southwards growth of Ware which would reduce the gap between Ware and the large village of Stanstead Abbots/St Margarets to the south.	<u>Significant Contribution</u> - This area contains the large Local Wildlife Site of Easneye Wood. However, the value of this area lies in its proximity to the Lea Valley and the contribution this area makes to the Ramsar site adjacent. The valley setting and the corridor created by the disused railway line contributes to maintaining an east-west wildlife corridor.	<u>Contribution</u> - A small part of this area touches the eastern edge of Ware and as such has a contribution towards preserving the setting of the town. The landscape and floodplain influences the shape of Ware as much as the Green Belt designation in this area. However, there are many important historic features and estates which have also contributed to the shape and growth of the town.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
27	80 – Rye Meads	<u>Significant Contribution</u> - This area covers the floodplain of the River Lea/Lee between the north east of Hoddesdon and the large village of Stanstead Abbots/St Margarets. As such, it plays a significant role along with the River Lea/Lee Valley and its environmental assets of European importance, in preventing the unrestricted sprawl of both settlements.	<u>Significant Contribution</u> - This area covers the floodplain of the River Lea/Lee between the north east of Hoddesdon and the large village of Stanstead Abbots/St Margarets. As such, it plays a significant role along with the River Lea/Lee Valley and its environmental assets of European importance, in preventing the merging of Hoddesdon and Stanstead Abbots St Margarets.	<u>Significant Contribution</u> - This area contains the Lea Valley Amwell Quarry which is a Ramsar Site of European Importance covered by designation as a Site of Special Scientific Interest as well as a Local Nature Reserve. This area is dominated by the Rye Meads Sewage Treatment Works and associated utilities.	<u>Limited Contribution</u> - The part of Hoddesdon which abuts this area has seen considerable change over the last 30 years or so and therefore bears no relation to the historic core of Hoddesdon. However, the large village of Stanstead Abbots/St Margarets is covered by a sizeable Conservation Area.
28	81 – Stanstead to Pishiobury Parklands	<u>Contribution</u> - The Green Belt in the west of this area around Stanstead Abbots/St Margarets plays a significant role in preventing the unrestricted sprawl of the village, which being otherwise relatively unconstrained would have likely spread further eastwards along local roads.	<u>Limited Contribution</u> - This area contributes to preventing the merging of neighbouring towns only in combination with area 29 to the south which contains the River Stort Valley. The Green Belt in this location does however have a role in preventing the growth of various small settlements in this area.	<u>Contribution</u> - There is a small amount of ribbon development stretching into this area from Stanstead Abbots/St Margarets to the west. There are two relatively large woodlands of Wildlife Site status in this area. Being on predominantly southward-facing slopes, the estate parklands and arable fields are prominent. The Harcamlow Way, a popular Right of Way extends throughout this area although access to the parklands is limited.	<u>Limited Contribution</u> - This area plays a limited role in preserving the setting of historic towns. However, where the area abuts the large village of Stanstead Abbots/St Margarets it influences the form of the eastern edge of the settlement.
29	81, 82 – Stanstead to Pishiobury Parklands, River Stort	<u>Contribution</u> - The River Stort and its floodplain has formed the strongest barrier to the northern growth of Harlow, which was originally designed to not breach the Stort Valley. This has been strengthened by the construction of the A414.	<u>Significant Contribution</u> - The Green Belt in this location contributes towards the strategic gap between Roydon and Harlow to the south, Stanstead Abbots/St Margarets to the north and Hoddesdon to the west.	<u>Significant Contribution</u> - This area contains a wealth of Wildlife Sites and a Local Nature Reserve/ SSSI, along with Rights of Way and Historic Parklands on the south-facing slopes of the Stort Valley.	<u>Contribution</u> - The original plan for the New Town of Harlow intended the River Stort and its valley to act as the northern limit to the settlement. There are a number of Historic Parkland estates within this area. However, the Stort Valley, A414 and railway line contribute to preventing the northward extent of Roydon and Harlow as much as the Green Belt designation.



East Herts District-Wide Green Belt Review: Part 1

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
30	81 – Stanstead to Pishiobury Parklands	<u>Limited Contribution</u> - The distance of this area from the nearest towns means this area of Green Belt has limited purpose in terms preventing the unrestricted sprawl of large built-up areas.	<u>Limited Contribution</u> - The large estate of Gilston Park and the village of Eastwick are the only notable settlements that would likely be larger if not for the Green Belt designation.	<u>Contribution</u> - There are several Wildlife Sites and important ancient woodlands in this area that are made more valuable given the large expanse of land managed as estate parklands or small farm holdings. The rising valley slopes make the countryside highly visible.	<u>Contribution</u> - There are several historic estates that have evolved into mansions with modern residential units in the grounds, which along with Eastwick village are the only forms of settlement in the area. However, the southward facing slopes of this area are a part of the Stort Valley which contributes to the setting of the New Town of Harlow.
31	82 – River Stort	<u>Significant Contribution</u> - The River Stort and its floodplain has formed the strongest barrier to the northern growth of Harlow, which was designed to not breach the Stort Valley. The Green Belt has prevented the northward sprawl of Harlow.	<u>Significant Contribution</u> - Particularly in the eastern part of this area, the Green Belt contributes along with the Stort Valley, to preventing Harlow from expanding northwards towards Sawbridgeworth. Otherwise, there is only the small village of Gilston that might otherwise be encroached upon.	<u>Significant Contribution</u> - The floodplain of the River Stort has formed the strongest barrier to encroachment. There are several stretches of the valley that are protected by Wildlife Site, Nature Reserve and SSSI status.	<u>Contribution</u> - The Stort Valley was designed to be the northern extent of the New Town of Harlow. However, there are physical constraints such as the valley environment that has contributed to this purpose more so than the Green Belt designation.
32	84, 82 – High Wych Slopes, River Stort	<u>Significant Contribution</u> - Even despite the Green Belt designation there is a considerable amount of sprawl leading south from Sawbridgeworth. Built development extends from Harlow right up to the County boundary.	<u>Significant Contribution</u> - There has been considerable built development in this area which has almost closed the gap between Sawbridgeworth and the New Town of Harlow to the south with considerable sprawl along all roads connecting the two towns. The Green Belt Strategic Gap is the only thing preventing the merging of the two settlements.	<u>Significant Contribution</u> - There has been considerable built development in this area which has encroached upon a number of Wildlife Sites and has reduced the open nature of the area by enclosing the few remaining farmland areas with suburban housing estates.	<u>Significant Contribution</u> - There has been considerable built development extending along all roads connecting Sawbridgeworth and Harlow. This has artificially extended the form of Sawbridgeworth to the south reducing the compactness of the small market town and the setting of the historic parkland of Pishiobury Park has been subsumed in the urban features of the A1184.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
33	84 – High Wych Slopes	<u>Contribution</u> - There are several hamlets and farm holdings along with the significant ribbon development all along High Wych Road including the High Wych village itself which have all sprawled along the main road to the south of this area. The Green Belt has helped to contain development but much harm to the openness has already occurred.	<u>Limited Contribution</u> - There is no town to the west of Sawbridgeworth, but the village of High Wych lies in proximity. There has already been a degree of ribbon development along the main roads in this area.	<u>Contribution</u> - The Rivers Nursery and Orchard is a key Wildlife Site as well as being of national arboricultural importance. There are many small lanes with some ribbon development leading to isolated hamlets but there are few features to form a boundary to development.	<u>Contribution</u> - Sawbridgeworth is a compact town and the Green Belt along with a small floodplain to the immediate west of the town has contributed to maintaining its form.
34	85 – Thorley Uplands	<u>Contribution</u> - There are several hamlets, farm holdings and an industrial park which has seen a number of changes of use to non-industrial uses within close proximity to Sawbridgeworth. If not for the Green Belt it is likely these would be larger. The built-up- area of Sawbridgeworth in this location has been contained by the existing land uses of two schools and a football ground.	<u>Contribution</u> - The village of Spellbrook lies halfway between Bishop's Stortford and Sawbridgeworth and has seen considerable ribbon development along London Road. Unchecked, there would be much more built development along the A1184. There is however, still a sufficient distance between the towns of Bishop's Stortford to the north and Sawbridgeworth to the south.	<u>Contribution</u> - The floodplain of the River Stort immediately adjacent to Sawbridgeworth is a Wildlife Site and is part of a non-designated historic estate. Apart from this small part to the east of the area, the land is dominated by arable farmland with some pastures with extensive open views. The degree of ribbon development around Spellbrook has created some encroachment into the countryside.	<u>Contribution</u> - Along with the constraints afforded by the railway line and river, the Green Belt here has helped prevent the northward growth of Sawbridgeworth, retaining the relatively compact nature of the town.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
35	85 – Thorley Uplands	<u>Contribution</u> - The A1184 St James Way (Bishop's Stortford Distributor Road) has created an effective boundary to the southward development of Bishop's Stortford but there are small farm holdings and the converted Thorley Hall within this area south of this road which, if not for Green Belt would probably have become more urbanised. Where the Green Belt extends into the town itself in the form of a green finger, this land is fairly narrow and acts as open space for recreational purposes and the Green Belt designation has helped to prevent sprawl of adjoining residential estates into the green finger.	<u>Contribution</u> - The village of Spellbrook lies halfway between Bishop's Stortford and Sawbridgeworth and has seen considerable ribbon development along London Road. Unchecked, there would be much more built development along the A1184. There is however, still a sufficient distance between the towns of Bishop's Stortford to the north and Sawbridgeworth to the south.	<u>Contribution</u> - There are several Wildlife Sites in this area and also the Thorley Flood Pound SSSI in the eastern part of this area. The floodplain of the River Stort is an important feature of the eastern half of this area. The expanse of arable farmland has reduced tree and hedge cover considerably leaving valuable small pocket woodlands and meadows. The degree of ribbon development around Spellbrook has created some encroachment into the countryside.	<u>Limited Contribution</u> - Prior to the construction of the A1184 St James Way (Bishop's Stortford Southern Distributor Road), the railway line, river and County boundary shaped the form of the town, more so than the Green Belt in this location. This area is some distance from the historic core of Bishop's Stortford which has largely been subsumed by modern development and the A1184 St James Way, to have a limited contribution in preserving the setting of the historic town. Where the Green Belt extends into the green finger running into centre of the town it, has contributed to shaping the more recent growth of the town.
36	85, 82 – Thorley Uplands, River Stort	<u>Contribution</u> - East of the B1529, there is little space between the road and the railway behind existing development. East of the railway the floodplain prevents development. The Whittington Way has formed a boundary to development. However, ribbon development has already occurred along the B1529 Thorley Street, which has the effect of urban sprawl stretching south of Bishop's Stortford.	<u>Limited Contribution</u> - There are a number of small settlements that could be encroached should development breach the A1184. The Green Belt immediately south of the town indirectly contributes to preventing the merging of Bishop's Stortford with the village of Spellbrook, but there is sufficient distance between this area and the town of Sawbridgeworth to the south.	<u>Contribution</u> - The physical barrier created by the A1184 St James Way to the south of this area acts as a barrier to accessing the wider countryside to the south of Bishop's Stortford. While there are no Wildlife Sites within the land south of Whittington Way, it does contain a section of the Hertfordshire Way, a footpath and Right-of-Way of considerable value. However, to the east of the A1184 London Road, this area contains a SSSI and Local Wildlife Site on floodplain. Ribbon development along Thorley Street has the function of screening much of the land off Whittington Way from view when approaching the town from the south.	<u>Limited Contribution</u> - Prior to the construction of the A1184, the railway line, river and County boundary shaped the form of the town, more so than the Green Belt in this location. The village of Thorley previously associated with Thorley Hall has been subsumed into the edge of Bishop's Stortford, forming the entry into the town from the south. This area is some distance from the historic core of the town and doesn't contribute to preserving the setting since the construction of the A1184 St James Way.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
37	86 – Perry Green Uplands	<p><u>Contribution</u> - The A1184 Bishops Park Way and the A120 junction serves as a barrier to preventing the unrestricted sprawl of Bishop's Stortford to the west. Although it is unlikely the A1184 Bishops Park Way would be breached, this strip of Green Belt serves to prevent further westward growth of Bishop's Stortford. Where the Green Belt extends into the town itself in the form of a green finger, it contains agricultural land and open space for recreational purposes, mostly associated with schools. The Green Belt designation has helped to prevent sprawl of adjoining residential estates into the green finger.</p>	<p><u>Limited Contribution</u> - There are several small settlements to the west of the town that lie just beyond the current Green Belt boundary, but there are no towns. However, the A1184 Bishops Park Way serves as an effective barrier.</p>	<p><u>Contribution</u> - The A1184 Bishops Park Way acts as a barrier to accessing the wider countryside to the west of Bishop's Stortford. There are several small woodlands of Wildlife Site status that might otherwise be encroached. However, within the green finger the land is open and flat, with long views. The area also acts as a considerable local resource for recreational activity.</p>	<p><u>Limited Contribution</u> - Where the Green Belt extends into the green finger running into centre of the town, it extends into the Town Centre Conservation Area, and as such has a role in preserving the special character of the town. Outside the bypass the area is some distance from the historic core of the town and doesn't contribute to preserving the setting of the town since the construction of the A1184 Bishops Park Way.</p>
38	150 – Hadhams Plateau	<p><u>Contribution</u> - The area of Green Belt which is beyond the A120 bypass has a limited contribution compared to the bypass itself which acts as a clear physical barrier to development. Although it is unlikely the A120 would be breached, this strip of Green Belt serves to prevent further northward growth of Bishop's Stortford. Within the bypass, the only part of this area that remains Green Belt is the part covered by Hoggates Wood and land south of Dane O'Coys Road. The rest of the land between the existing built-up area and the A120 is designated as Safeguarded Land where the provisions of Green Belt policy would apply until such time a strategic need is established.</p>	<p><u>Limited Contribution</u> - This area has a limited role in preventing Bishop's Stortford from merging with any neighbouring town.</p>	<p><u>Contribution</u> - The A120 serves this purpose more effectively than just the strip of Green Belt. Outside the bypass, there are several small woodlands of Wildlife Site status that might otherwise be encroached, but access to this area to and from the town is limited. The Hoggates Wood area is a considerable local asset and is a Local Wildlife Site. There are a number of large isolated houses located along Dane O'Coys Road, but no other evidence of encroachment.</p>	<p><u>Limited Contribution</u> - This area is some distance from the historic core of the town and doesn't contribute to preserving the setting of the town since the construction of the A120.</p>

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
39	149, 151 – Bourne Brook Valley, Stort Meads	<u>Contribution</u> - The area of Green Belt which is beyond the A120 bypass has a limited contribution compared to the bypass itself which acts as a clear physical barrier to development. Although it is unlikely the A120 would be breached, this strip of Green Belt serves to prevent further northward growth of Bishop's Stortford. Within the bypass, the land that runs from the A120 southwards between Hazelend Road and the railway line acts as a green finger running into the centre of the town. This land is a flood plain providing a physical barrier to sprawl into this area.	<u>Contribution</u> - There are only small villages to the north of Bishop's Stortford. However, to the north-east lies the small town of Stansted Mountfitchet and the Green Belt here prevents the southward expansion of Stansted Mountfitchet towards Birchanger village and the A120.	<u>Contribution</u> – The River Stort is a considerable local asset in terms of access to the countryside. There are several Local Wildlife Sites along the green finger and much of this land is also used for local recreational purposes.	<u>Limited Contribution</u> - Where the Green Belt extends into the green finger running into centre of the town, it extends into the Town Centre Conservation Area, and as such has a role in preserving the special character of the town. This area is some distance from the historic core of the town and doesn't contribute to preserving the setting of the town since the construction of the A120.
40	None – Bishop's Stortford Golf Course	<u>Contribution</u> - This area of Green Belt contributes to preventing the eastward expansion of the town towards the M11 and the Birchanger Green Services estate on junction 8 of the M11.	<u>Significant Contribution</u> - While the Birchanger Green Services is not a town, it is an intensively used urban feature alongside the complex junction 8 of the M11 which, when viewed together with the existing infrastructure along the A1250 and A120 junctions and the infrastructure of Stansted Airport there is an almost continuing urbanisation between Bishop's Stortford and the Airport. This area of Green Belt plays a significant role in preventing not towns but a town and a large urban area from merging.	<u>Limited Contribution</u> - The land is currently occupied by a golf course offering recreational activity though not on a wide public access. There is limited access through this area to the countryside beyond. The M11 also creates a clear barrier to accessing the wider countryside. There are several small Local Wildlife Sites within the area.	<u>Limited Contribution</u> - This area has a limited contribution towards preserving the setting and special character of Bishop's Stortford as a market town. The area is some distance from the historic core and is separated by relatively recent residential estates and large employment areas.

District-Wide Assessment ID	Landscape Character Assessment Area ID	1. Check the unrestricted sprawl of large built-up areas	2. Prevent neighbouring towns merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns
41	None / Birchanger Wood and land within Uttlesford District	<u>Contribution</u> - The village of Birchanger lies in close proximity to the north-eastern edge of Bishop's Stortford, separated by Birchanger Wood and the A120. The District and County boundary is tightly drawn to the edge of Bishop's Stortford and this along with the Birchanger Wood has prevented the northwards sprawl of the town as much as Green Belt designation in this location.	<u>Contribution</u> - While Birchanger village is not a town, development in this location would reduce the distance between the built-up edge of Bishop's Stortford and the urban mass that is the Stansted Airport and its environs.	<u>Contribution</u> - Birchanger Wood is a Local Wildlife Site of considerable value in this otherwise urban area. The village of Birchanger consists of two small residential areas separated only by a playing field. However, the village sprawls eastward in the form of ribbon development along Birchanger Lane.	<u>Limited Contribution</u> - This area has a limited contribution towards preserving the setting and special character of Bishop's Stortford as a market town. The area is some distance from the historic core and is separated by relatively recent residential estates and large employment areas.



This page is intentionally left blank



EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 3 OCTOBER 2013

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

DISTRICT PLAN - UPDATE REPORT

WARD(S) AFFECTED: ALL

**Purpose/Summary of Report**

- This report sets out the progress towards finalisation of a development strategy for the District, including District Plan Executive Panel dates for consideration of the draft plan;
- Details of the approach to schools planning are provided, including attendance of schools officers from the County Council at the District Planning Executive Panel to answer questions in relation to their area of expertise;
- Members are reminded of the important workshop between 10am and 4pm on Thursday 24<sup>th</sup> October, to review the draft District Plan.

**RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:**

<b>(A)</b>	<b>the latest evidence supplied by Hertfordshire County Council in relation to schools planning, be noted;</b>
<b>(B)</b>	<b>the proposed approach to the preparation of an Infrastructure Topic Paper, followed by an Infrastructure Delivery Plan based on a specially commissioned delivery study, be supported; and</b>
<b>(C)</b>	<b>the latest national guidance, including that in relation to the importance of meeting housing needs within each housing market area, be noted.</b>

**RECOMMENDATIONS FOR COUNCIL: That:**

<b>(A)</b>	<b>the latest evidence supplied by Hertfordshire County Council in relation to schools planning, be noted;</b>
------------	--

<b>(B)</b>	<b>the proposed approach to the preparation of an Infrastructure Topic Paper, followed by an Infrastructure Delivery Plan based on a specially commissioned delivery study, be agreed; and</b>
<b>(C)</b>	<b>the latest national guidance, including that in relation to the importance of meeting housing needs within each housing market area, be noted.</b>

## 1.0 Background

1.1 In July 2012 a shortlist of potential development options was agreed for further assessment and testing (see Background Papers). The shortlisted options are as follows:

- Up to 4,700 dwellings at Bishop’s Stortford
- Up to 2,000 dwellings at Buntingford
- Up to 1,700 dwellings at Hertford
- 10,000 dwellings north of Harlow
- 5,000 dwellings in the Hunsdon area
- Up to 270 dwellings at Terlings Park north of Harlow
- Up to 3,000 dwellings west of Sawbridgeworth
- Up to 3,000 dwellings north and east of Ware
- Up to 2,000 dwellings east of Welwyn Garden City
- Around 900 dwellings in total in the villages

It is not yet clear which of these options will be needed for the draft plan. All of these figures are subject to change as the strategy selection process enters its final phase.

1.3 In November 2012 (see Background Papers) it was explained that a delay to finalisation of the District Plan – Part 1: Strategy was necessary because further work was needed in the field of schools planning, highways assessment, and viability assessment. It was explained that *“although the NPPF [National Planning Policy Framework] 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.”*

1.4 In February 2013 (see Background Papers) it was explained that *“recent interpretation of objectively assessed need by the Planning Inspectorate suggests that East Herts Council may need to plan for the upper end of the previously agreed range of 10,000 to 17,000 dwellings”*. It was also explained that because of continued uncertainty in relation to transport and schools

planning, combined with the requirement for the plan to be effective throughout its period, the consultation on the draft District Plan is of necessity subject to further delay.

1.5 In July 2013 (see Background Papers) Member agreement was sought to the engagement of ATLAS, the Homes and Communities Agency's planning experts, to assist and advise the District Council in respect of matters relating to infrastructure provision and delivery. Members were also requested to agree the consolidation of the originally proposed two-part plan into a single plan, including development allocations and development management policies. Members were also advised of the most recent round of demographic projections work, which confirmed earlier projections of objectively assessed housing need towards the upper end of the range 10,000 to 17,000 dwellings.

## 2.0 Report

2.1 This report considers the following four broad areas:

- Methodology Update
- Infrastructure Update
- ATLAS Update
- Planning Practice Guidance

## **Methodology Update**

2.2 The Stepped Approach set out in **Essential Reference Paper 'B'** is based on a logical and transparent process which was introduced at the outset of the strategy selection process in March 2012. Version 5 updates the previous versions to reflect changes to the methodology proposed below, and includes scheduled meeting dates for bringing forward the draft Plan for formal consideration by the Council prior to public consultation.

2.3 The tools used as part of the methodology should add value and clarity to the plan-making process. Flexibility is important in the choice of tools to ensure that the procedural elements of plan-making do not obscure key points in the evidence.

2.4 An important feature of the approach to date has been the 'sieve' approach, whereby the list of 69 initial 'areas of search' has been gradually reduced through the application of a number of assessments applied consistently across all assessment areas. The conclusions of Sieve 1 and Sieve 2 were presented in July 2012, and Sieve 3a (economic development) and Sieve 3b (urban

form) were presented in November 2012. The sieve approach has been a helpful tool during the early stages of plan-making, during which a wide range of assessments have been undertaken by Officers in-house.

- 2.5 Entering the final phase of plan-making, assessment is focused on a few complex outstanding issues, particularly related to matters of delivery. Given the critical role of detailed specialist third-party input, and also the site-specific nature of infrastructure and delivery issues, it is considered unhelpful to filter the evidence supplied through the standardised sieving process, which introduces risk of misinterpretation. It also requires a full set of evidence to be provided, when as is highlighted in the infrastructure planning update below, further evidence remains to be provided.
- 2.6 It has become clear that the Green Belt Review technical study is not in itself able to reach conclusions about which areas of Green Belt should be released for development. This is part of the function of the development strategy, where the housing requirement (top down) is informed by the evidence provided in the technical studies (bottom up) to reach a balanced judgement. As explained further in the **District-Wide Green Belt Review – Part 1 Report (Agenda Item 7)**, it is therefore not possible to draw firm conclusions for the study from the technical report in isolation. These decisions will be made in Chapter 6 of the Supporting Document to the District Plan.
- 2.7 For these reasons, for the remainder of the plan-making process it is proposed to maintain consistency and transparency through approaches better tailored to each specific area of investigation. It is therefore not proposed to progress with the Supporting Document Chapter 5: Options Refinement, but instead to present Chapter 6: Strategy alongside the draft Plan.
- 2.8 Chapter 6 will perform the central function of striking an appropriate balance between all the various constraints and requirements, based on earlier work in the Supporting Document and supplemented by other evidence as necessary.

### **Infrastructure Update**

- 2.9 Infrastructure planning is critical to a sound plan, and one of the most challenging areas of plan-making. The District Council has made strenuous efforts to work with infrastructure providers to ensure that there is a reasonable prospect that the draft plan can

be delivered. **Essential Reference Paper 'C'** consists of the County Council's response to the District Council's request for information.

- 2.10 Acknowledging the complexity and central importance of this work, Hertfordshire County Council schools planning officers have agreed to attend meetings of the District Planning Executive Panel to answer questions from Members in relation to their response at the Panel Meeting on 3<sup>rd</sup> October 2013. .
- 2.11 In relation to transport, Hertfordshire County Council (in partnership with Essex County Council and the Highways Agency) has been asked to prepare a document which sets out clearly for the purposes of examination in public the impact on the highway network, taking account of new infrastructure provision and other mitigation measures. This report will draw on the extensive transport modelling work undertaken to date. It will form an interim report on the work necessary for this stage in the plan-making process, and any further work needed. Officers from the County Council have agreed to complete this report for presentation to Members at the next meeting of the District Planning Executive Panel on 18<sup>th</sup> November.
- 2.12 Healthcare is another area of infrastructure planning relevant to the District Plan. Whilst there are many areas of healthcare concern, including public health and specialist care facilities, attention is focussed on the provision of GP facilities, which are likely to require long-term investment both to expand the capacity of existing surgeries and possibly also in a small number of cases to provide entirely new facilities.
- 2.13 Officers have been working with both the Clinical Commissioning Group, representing GPs, and also with NHS England, which undertakes asset planning in relation to GP premises, to identify constraints emerging from development options for a new draft plan. Although still work in progress, the NHS has made it clear that funding and long-term planning are difficult issues across the country, given increasing demands on limited NHS resources.
- 2.14 The NHS has stated that it is likely to require developer contributions to ensure provision of the necessary facilities to support growth and development. In order to achieve this goal, the health service will need to provide information about the type and location of preferred facilities, together with estimated costs, and this will need to be subject to viability assessment. This will

need to form part of an ongoing programme of work over the coming year and prior to examination of the plan.

- 2.15 In relation to planning applications, East Herts Council's Development Management Service where appropriate consults the NHS and other important bodies such as the police in relation to facilities provision.
- 2.16 The July Update report (see Background Papers below) explained that an Infrastructure Topic Paper based on input from key providers will underpin decision-making on the draft District Plan. The Topic Paper will be presented at the scheduled District Planning Executive Panel meetings before the end of the year. As previously explained, more detailed work towards an Infrastructure Delivery Plan will be carried out prior to examination later in 2014.
- 2.17 The Infrastructure Topic Paper will form a succinct statement of prospects for the provision of the main items of capital expenditure to support the plan. It will not contain detailed assessment of funding packages and infrastructure costs, but will review the main messages from the key infrastructure and service providers, and identify the next steps towards examination.
- 2.18 The Topic Paper will be proportionate to NPPF requirements at draft Plan stage. As explained in July, more detail, including on a wider range of infrastructure types, and also including funding and costing detail, will be accumulated as the Topic Paper gradually evolves and expands into a Delivery Plan. The Delivery Plan will be accompanied by an infrastructure schedule for ongoing monitoring and updating throughout the lifetime of the plan.
- 2.19 In order to ensure a sound basis for the Delivery Plan, it is proposed to commission a delivery study early in 2014, following the agreement of Full Council to consult on the draft Plan. This work will include assessment of financial and infrastructure delivery. It will require the appointed consultants to liaise directly with infrastructure and service providers, and investigate funding arrangements. The consultants will be expected to draw on specialist expertise in planning obligations as well as infrastructure planning.

## ATLAS Update

2.20 In summary, the role of ATLAS is:

- To draw knowledge and experience from other Councils facing similar issues;
- To advise the Council in respect of key deliverability considerations and their relationship to plan-making processes; and
- To support external partners to find a way forward in the preparation of a suitable evidence base in light of the above, if necessary and appropriate through direct engagement with relevant external bodies.

2.21 An illustrative Project Engagement Plan was presented to Members in July 2013. The finalised Project Engagement Plan (PEP) is contained at **Essential Reference Paper 'D'**. Section 5 of the PEP contains a 'project appreciation' and Section 6 contains the proposed ATLAS response, including three specific tasks to support East Herts Council in its plan-making role.

2.22 ATLAS has been closely engaged in work with Officers, including in discussions with partners from external organisations and delivery bodies, to identify the key outstanding delivery issues and meet the objectives set out in the Project Engagement Plan.

2.23 The ATLAS Delivery Advice Note for East Herts Strategic Sites is contained within **Essential Reference Paper 'E'**. Section 4 of the document on Strategic Sites sets out key principles for strategic sites drawn from the National Planning Policy Framework, draft National Planning Practice Guidance and advice from the Planning Inspectorate and Planning Advisory Service. It also considers how strategic sites and matters relating to deliverability have been assessed at 11 Local Plan examinations and draws out over 30 lessons. Whilst each Local Plan has its own context and influences, some of the key messages from this work include the following:

- The scope to use appropriate policy tools to ensure that there is a robust process in place to work with key stakeholders (including developers) over time. The approach should seek to ensure that development and associated infrastructure comes forward in tandem, with safeguards to prevent unacceptable outcomes at various stages in the planning process;

- The need to work with partners to ensure that the policies are backed up by reasonable evidence, for example by working with promoters to prepare masterplans/concept plans to demonstrate feasibility, or agreeing statements of common ground on key issues with the relevant bodies;
- Whilst the Core Strategy is the place to make the key in principle decisions, future planning stages could confirm details and resolve matters that may be outstanding;
- Uncertainty in terms of specific infrastructure works or their funding is not fatal; as long as a reasonable level of work has been done to show that there are options to address issues, and the key relevant stakeholders have not objected or identified (with evidence) potential show stoppers;
- The need to recognise that there may inevitably be an element of uncertainty given that some strategic sites will take many years to fully deliver, but that a reasonable level of work is needed to demonstrate there are no clear show-stoppers, with a clear agreed process in place to resolve any such uncertainty over time;
- The significance of timing. It is essential to understand the need for and delivery of infrastructure in the first five years of a plan's period, but expectations are less in relation to project needs or specific items of infrastructure that will come forward in the medium to longer term;
- Where uncertainty does exist, plans should be flexible, consider contingencies but avoid spurious accuracy;
- Vague statements on viability or that infrastructure will be funded are unlikely to carry much weight unless they are backed up by transparent evidence that can be tested.

2.24 The Note concludes by highlighting three key issues in relation to strategic sites which the Council should consider further. In summary these are:

- Engagement with promoters/prospective developers:** The need to engage with promoters/ prospective developers to set out the issues that the Council will need to be satisfied on, the evidence that is considered necessary to demonstrate deliverability and a clear timetable and route map for joint working up to the submission of a District Plan and its examination;
- Infrastructure:** The need to establish clear processes and procedures to help reduce uncertainty and manage risk;



- c) **Duty to Co-Operate:** The need to work with adjoining Authorities on a shared vision for any strategic sites that are adjacent to/overlap District boundaries. This should also consider the approach to relative housing contributions to address objectively assessed needs, cross boundary impacts and infrastructure issues.

## Planning Practice Guidance

- 2.25 On 28<sup>th</sup> August the Government published online in 'Beta' test mode a new streamlined planning practice guidance, which will replace the existing 7,000 pages of guidance following 'go-live' this autumn. A short window of 6 weeks for informal comment was provided until 9<sup>th</sup> October. A link to the guidance is provided under the Background Papers below, although this may change with the final publication.
- 2.26 The guidance covers a wide range of topics. For the purposes of the current stage of plan-making, the sections on Local Plans and the Duty to Co-Operate, and Housing Needs are especially relevant. Key passages from these sections of the guidance are contained within **Essential Reference Paper 'F'**. In summary, the main points from the Local Plans guidance are as follows:
- A single plan is preferred, but other documents such as Area Action Plans may be produced so long as they are clearly justified;
  - Most Local Plans are likely to require updating in whole or in part at least every five years;
  - The consequences of uncertain infrastructure delivery should be clearly set out in the plan;
  - Local Economic Partnerships should be engaged at an early stage, including the prospects for investment in infrastructure;
  - Neighbourhood Plans should be in conformity with the Local Plan, and Local Plans should take account of Neighbourhood Plans.
- 2.27 In relation to the Duty to Co-Operate, the guidance includes the following points:
- Co-operation should produce effective and deliverable policies on strategic cross boundary matters;
  - Co-operation should follow the functional geography of an area, for example across housing market and travel-to-work areas;

- Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others;
- local planning authorities are not required to reach agreement about the planning strategy before they submit their Local Plans for examination. But local planning authorities should ensure that their Local Plan is effective before they submit it for examination.

2.28 In relation to housing and economic need, the guidance includes the following points:

- The definition of housing need should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand;
- Plan makers should not apply constraints to the overall assessment of need;
- Needs should be assessed in relation to the relevant functional area: either a housing market area [or] a functional economic area in relation to economic uses;
- Office for National Statistics (ONS) Household Projections should provide the starting point for assessment of overall housing need.

2.29 The guidance provides welcome clarity on some points, and less so on others. It is clear that much is dependent on the specific issues which need to be addressed by each plan. However, there are no apparent grounds for concern arising from the guidance in relation to the procedural aspects of East Herts District Plan.

2.30 One area for further work will need to be around the involvement of the Hertfordshire Local Economic Partnership (LEP) in terms of funding arrangements. The LEP is undertaking further work to look at future investment priorities. The Council will need to seek to influence these priorities, as the detailed requirements of the District Plan become clearer over the coming year.

### **Dates for consideration of the Draft District Plan**

2.31 Owing to the volume and significance of material within the plan to consider, it is proposed to present the draft District Plan at two separate meetings. Therefore two meetings of the District Planning Executive Panel have been scheduled, on **18<sup>th</sup> November** and **3<sup>rd</sup> December** 2013.

- 2.32 It is anticipated that the 18<sup>th</sup> November panel will consider the draft District Plan development management policies, covering the full range of non-place specific policy topics including housing, economic development, environment, design, and transport.
- 2.33 For the meeting on December 3<sup>rd</sup> it is anticipated that the panel will consider place-specific policies including the overarching development strategy, infrastructure policies, and site allocations.

### **Reminder – Member Workshop on 24<sup>th</sup> October 2013**

- 2.34 A workshop for Members will be held in the Council Chamber on October 24 between 10am and 4pm for early review and discussion of a draft plan, and the alternative options. It is proposed to engage the Planning Advisory Service (PAS) to facilitate this session and to provide guidance in respect of requirements of the examination in public. **Please can Members who have not yet done so confirm their attendance by emailing [claire.sime@eastherts.gov.uk](mailto:claire.sime@eastherts.gov.uk).**

### 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

Planning Practice Guidance – Beta Test Version August-October 2013:  
<http://planningguidance.planningportal.gov.uk/>

District Planning Executive Panel reports:

- District Plan Update Report (25 July 2013)
- District Plan Part 1 – Update Report (21 February 2013)
- District Plan Part 1 – Strategy Supporting Document – Update Report (28<sup>th</sup> November 2012)
- District Plan Part 1 – Strategy Supporting Document – Update Report (26<sup>th</sup> July 2012)
- District Plan Part 1 – Strategy Supporting Document – Chapter 4: Places, and Next Steps (26<sup>th</sup> July 2012)
- Local Development Framework Core Strategy: Approach, Technical Work, and Next Steps.

<http://online.eastherts.gov.uk/moderngov/mgCommitteeDetails.aspx?ID=151>

Contact Member: Cllr Mike Carver - Executive Member for Strategic Planning and Transport  
[mike.carver@eastherts.gov.uk](mailto:mike.carver@eastherts.gov.uk)

Contact Officer: Kevin Steptoe - Head of Planning and Building Control  
01992 531407  
[kevin.steptoe@eastherts.gov.uk](mailto:kevin.steptoe@eastherts.gov.uk)

Report Author: Martin Paine - Senior Planning Policy Officer  
[martin.paine@eastherts.gov.uk](mailto:martin.paine@eastherts.gov.uk)

## ESSENTIAL REFERENCE PAPER 'A'

### IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p><b>People</b> This priority focuses on enhancing the quality of life, health and wellbeing, particularly for those who are vulnerable, and delivering strong services.</p> <p><b>Place</b> This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p><b>Prosperity</b> This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic opportunities and delivering cost effective services.</p>
Consultation:	N/A
Legal:	N/A
Financial:	N/A
Human Resource:	N/A
Risk Management:	Failure to agree the approach to infrastructure and delivery issues outlined could lead to the District Plan being found unsound at Examination.

This page is intentionally left blank

**A Stepped Approach to preparation of the District Plan – Version 5 (October 2013)**



Step 1	Step 2	Step 3	Step 4	Step 5	Step 6	Step 7	Step 8
<b>Explaining the nature of the task and the wider context</b>	<b>Understand the strategic planning issues</b>	<b>Developing 69 assessment areas and 21 topics, assessing each area against each criterion</b>	<b>Applying topic assessments and considering areas in their wider context to produce a short-list of options</b>	<b>Technical work to refine the short-list</b>	<b>Strategy formulation and Infrastructure Planning</b>	<b>Direct Member-level engagement</b>	<b>Draft District Plan</b>
<p>29 March 2012</p> <p><b>Supporting Document Ch 1: Background and Approach</b></p> <p>Introduction District Plan Progress So Far Scope Planning Policy and the Planning System</p> <p>Localism and Neighbourhood Planning</p> <p>A Stepped Approach</p> <p>Consultation Refining the Approach</p> <p>Delivery Infrastructure Planning</p> <p>Sustainability Appraisal.</p>	<p>29 March 2012</p> <p><b>Supporting Document Ch 2: Issues</b></p> <p>Housing</p> <p>Economy</p> <p>Education</p> <p>Transport</p> <p>Water</p> <p>Telecoms, Gas and Electricity</p> <p>Natural and Historic Environment</p> <p>Green Belt</p> <p>Community and Leisure</p> <p>Natural Resources</p> <p>Environmental Quality</p>	<p>29 March 2012 26 July 2012</p> <p><b>Supporting Document Ch 3: Assessment Criteria</b></p> <p><i>Part 1:</i> 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</p> <p><i>Part 2:</i> Application of the criteria from Part 1 to the 69 areas of search, to produce a 'Traffic Light' rating</p> <p><b>(Appendix A)</b></p>	<p>26 July 2012</p> <p><b>Supporting Document Ch 4: Places</b></p> <p><b>Sieve 1: Area Assessments</b></p> <p>Evaluation of 69 separate areas using the criteria established in Chapter 3, and using the traffic light assessments.</p> <p>Local-area consideration of revised scale assumptions against initial test assumptions.</p> <p><b>Sieve 2: Settlement Evaluations</b></p> <p>Consider impact of combinations of possible growth areas on existing settlements and the wider area.</p> <p>Evaluation of whether/how growth could fit within this wider context.</p> <p>Settlement-level consideration of revised scale assumptions.</p> <p>Based on Sieve 1 results plus Documents and Feedback</p> <p><b>(Appendix B)</b></p>	<p>28 November 2012</p> <p><b>Supporting Document Ch 5: Options Refinement</b></p> <p><b>Sieve 3a: Economic Development</b></p> <p><b>Sieve 3b: Urban Form</b></p> <p><b>3<sup>rd</sup> October 2013</b></p> <p>District-Wide Green Belt Review Part 1</p> <p>Landowner/developer questionnaires and ATLAS meeting notes</p> <p><b>18<sup>th</sup> November 2013</b></p> <p>Transport Briefing Note on any severe impacts (Hertfordshire County Council)</p>	<p>3<sup>rd</sup> December 2013</p> <p><b>Supporting Document Ch 6: Strategy</b></p> <p>Housing Requirements</p> <p>Housing Trajectory</p> <p>Soundness Requirements</p> <p>Draft Development Strategy</p> <p>Executive Summary</p> <p>Sustainability Appraisal of Preferred Strategy</p> <p>Habitats Regulations Assessment</p> <p>Infrastructure Topic Paper (overview of key positions and outstanding issues)</p>	<p><b>Informal Member discussion group on draft policies</b></p> <p>14<sup>th</sup> April 2013 Natural Environment, Landscape, Heritage</p> <p>15<sup>th</sup> May 2013 Climate Change, Water, Environmental Quality</p> <p>14<sup>th</sup> June 2013 Design, Transport</p> <p>12<sup>th</sup> July 2013 Economy, Retail and Town Centres</p> <p>16<sup>th</sup> September 2013 Housing, Community Infrastructure</p> <p>3<sup>rd</sup> October 2013 Delivery, Development Management, Review of amendments</p> <p>Executive Member-level meetings: all adjoining Districts (December 2012-December 2013)</p>	<p>18<sup>th</sup> November 2013</p> <p><b>Draft District Plan</b></p> <p>Development Management policies</p> <p><b>3<sup>rd</sup> December 2013</b></p> <p><b>Draft District Plan</b></p> <p>Development strategy</p> <p>Site and location specific policies</p> <p>Site allocations</p> <p>Infrastructure policies</p> <p>Policies map</p> <p><b>9<sup>th</sup> December 2013</b></p> <p>Executive</p> <p><b>11<sup>th</sup> December 2013</b></p> <p>Full Council (to approve draft plan for consultation)</p>
<p><b>Member Comments</b> April 2012</p>		<p><b>Member Comments</b> April 2012</p>	<p><b>Member Comments</b> August 2012</p>	<p><b>Member Workshops</b> 8<sup>th</sup> November 2012 17<sup>th</sup> January 2013</p>	<p><b>Member Workshop (Draft Plan)</b> 24<sup>th</sup> October 2013</p>		<p><b>Public Consultation on draft District Plan including all supporting evidence</b></p>

This page is intentionally left blank



## **Hertfordshire County Council's Response to Demand for Primary and Secondary School Places in East Herts District – September 2013**

### **Introduction**

In February 2013 East Herts District Council (EHDC) requested information from Hertfordshire County Council (HCC) on the school place planning implications of the Potential Development Areas being considered as part of the Local Plan preparation.

This document forms the response to that request, updating information previously provided on primary schools, as well as responding on secondary schools across the District. It is therefore considered a standalone comprehensive response to the current development growth outlined by EHDC. Please note the housing numbers referred to are those provided by EHDC on 6 September 2013.

To assist with interpreting the information provided the background to the current situation regarding school places within the District, together with a definition of the terms used throughout this document, is given below.

### **School Planning Context**

Hertfordshire has experienced a significant rise in the demand for primary places across the County in recent years in line with the picture nationally. The rise is not consistent across the county with some areas experiencing substantial increases in the primary aged population, whilst in some more rural areas demand is less pressing or currently remains fairly static.

HCC has adopted a strategy to respond to the rising demand for school places, developing a primary expansion programme across the County to meet the additional need. This programme has seen significant level of additional school places provided across the County year on year since 2012. Proposals, including new schools, have been agreed (subject to town planning consent) to meet additional need for September 2014, including new places in Ware within East Herts District.

Work is now underway to identify primary expansion options for 2015 and the County Council will bring forward school enlargement proposals for this in due course. In parallel, with the increased primary demand beginning to be reflected in our forecast need at secondary level, feasibility work is underway to identify options for meeting rising secondary need in identified areas across the County.

A summary of the process required to deliver additional school places in an area of identified need is contained in **Appendix 1**.

### **Forms of Entry**

School provision is often described in terms of 'forms of entry'. 1 form of entry (f.e.) equals 30 places per year group.

Primary schools have seven year groups from Reception through to Year 6. HCC has a preference for primary schools of 2 f.e. or more as this larger size provides improved opportunities for delivery of a broad education curriculum and staff development, as well as offering the ability to better manage fluctuations in demand

Secondary schools have 5 year groups, from Year 7 through to Year 11 and sixth forms, with lower and upper year groups. A typical Hertfordshire secondary school is between 5 and 8 f.e., with a 5 f.e. school having  $30 \times 5 \times 5 = 750$  compulsory age pupils. Currently on average across the County, approximately 60% of students take up places in the sixth form, although this varies in specific areas.

Local authorities have a duty to ensure that sufficient, suitable places are available to meet the reasonable needs of all young people

When undertaking high level school place planning related to new residential development (e.g. at Local Planning stage) HCC determines child yield based on a ratio of 1 f.e. per 500 dwellings to be 97.5% confident of not underestimating yield.

This is based on a study of 49 Hertfordshire developments undertaken by HCC's demographer (c 2008). This work produced a yield range of 1 f.e. per 500 dwellings [42 children per 100 dwellings/97.5% confidence of not underestimating child yield] to 1 f.e. per 850 dwellings [24.7 children per 100 dwellings/50% confidence of not underestimating child yield]. This range is referred to throughout this document. The County Council applies the upper end of the range, 1 f.e. per 500 dwellings, in the first instance for reasons of prudence.

When considering actual proposals or planning applications the County Council uses specific development forecasting models to ascertain more tailored demographic profiles, including child yields.

### **School Site Size Standards**

The school site standards have recently changed (School Premises Regulations (2012)) and provide a much less stringent approach to school site standards. The previous prescriptive formula based a certain area of space per pupil has been replaced with the term 'suitable'. The County Council has recently reviewed its school site size standards and have agreed to continue using previous site areas that refer to Building Bulletin 99/99 guidance as these are deemed 'suitable'. Deviation from these standards will only be considered under exceptional circumstance.

### **Detached Playing Fields**

Ideally a school should have all of the facilities it requires, including playing fields, provided on a single site. However, there may be situations where in order to provide additional school place capacity at an existing site a detached playing field is required.

A detached playing field is an off-site area that is accessed by the school during school hours to enable delivery of the required sports curriculum. It can be in the form of a public recreation ground, a Multi Use Games Area (MUGA) or on HCC owned land. For a primary school this facility should ideally be located within 400

metres of the main school site and be appropriate to enable delivery of the PE curriculum.

## **Types of Schools**

There is a diverse range of schools within Hertfordshire and East Herts District, including both two tier and three tier education systems.

The Local Authority has a statutory duty to ensure sufficient school places within its area. However, HCC is only the admitting authority for voluntary controlled and community schools across the County. There is a wide variety of schools including academies, voluntary aided, foundation and trust schools which are their own admitting authorities, determining their own admissions policies and over-subscription criteria.

All admitting authorities' admissions rules and policies must abide by the Admissions Code but the Local Authority, in its role as commissioner of places rather than a provider has no power to direct schools that are their own admitting authority to provide additional places.

Information on each of the schools discussed in this report is given in **Appendices 2 and 3**, which include the type of school at the time of writing. However, the information may change over time as more schools become academies.

## **Pupil Forecasts**

The County Council produces pupil forecasts twice each year. Further information on the methodology around these can be found at:

<http://www.hertsdirect.org/services/edlearn/aboutstatesch/planning/>

## **Green Belt Boundaries**

HCC would seek a flexible approach to Green Belt boundaries which fall within school sites. The inclusion of school sites within the Green Belt can provide potential difficulties in expanding these schools and it is considered that a more flexible approach with regards to Green Belt policy and schools is required for the long term.

## **Primary Schools**

The response given below relates to the latest housing numbers provided on 6 September 2013 by EHDC. Information on the potential of the named primary schools to expand is given in **Appendix 2**.

### **Bishop's Stortford**

<b>Potential Development Area</b>	<b>No Dwellings</b>	<b>Nearest Primary Schools</b>
North of Bishop's Stortford	2650 (5FE)	n/a
South of Bishop's Stortford	800	Richard Whittington Thorley Hill
East of Bishop's Stortford	150	Summercroft
Bishop's Stortford Goods Yard	160	Hillmead St Joseph's Summercroft
Bishop's Stortford Old River Lane/Causeway	100	Hillmead St Joseph's Summercroft
Small Sites / SLAA Sites	267	Depends upon site location
<b>TOTAL</b>	<b>4127</b>	

**4127 dwellings equates to between 5 to 8.5 f.e.**

In respect of the existing primary schools within Bishops Stortford, these are currently all full or nearing capacity and current forecasts suggest the current level of demand is likely to continue into the future.

It should be noted that the County Council has seen dramatic increases in primary aged population in many parts of the county recently; which the County Council has responded to with a significant primary expansion programme. Bishops Stortford has not yet been impacted by rises experienced elsewhere but may be so in the future.

Any potential primary expansion capacity across the town is required to deal with potential future growth arising from the existing communities and HCC will manage this demand accordingly. In short, HCC would seek appropriate and adequate developer contributions and/or new school sites to provide for the infrastructure requirements arising from future housing developments in the area.

It would also be prudent to plan and allocate a reserve 2 f.e. primary school site in the town to potentially meet future needs.

## Buntingford

Potential Development Area	No Dwellings	Nearest Primary Schools
Buntingford	470 + 400 safeguarded	Layston First School Millfield First School
Small Sites / SLAA Sites	44	Layston First School Millfield First School
<b>TOTAL</b>	<b>514 + 400 safeguarded</b>	

**514 dwellings equates to 0.6 to 1.1 f.e.**

**914 dwellings equates to 0.9 to 1.9 f.e.**

A three tier education system operates in Buntingford with a mixture of first, primary and middle schools offering places to primary aged pupils.

Currently there is some available and potential additional capacity available in the Buntingford First schools planning area. However, owing to the notable interest from developers for housing of significant numbers, a master plan is needed for the town to ensure adequate infrastructure requirements are provided related to new development in the area.

## Hertford

Potential Development Area	No Dwellings	Nearest Primary Schools
Hertford West	550	Hollybush.
Hertford North	150	Bengeo
Hertford South	100	There are potential options for a 2 f.e. school on land in HCC ownership.
Hertford South – Mead Lane	100	Wheatcroft
Hertford National Grid/Norbury Woodyard	200	Wheatcroft
Hertford West of Marshgate Drive	182	Wheatcroft
Hertford – former Police Station	126	Wheatcroft
Small Sites/SLAA Sites	307	Depends upon site location
<b>TOTAL</b>	<b>1715</b>	

**1715 dwellings equates to 2 to 3.5 f.e.**

Hertford has experienced pressure on primary places in recent years with additional temporary places provided in the town in 2012. Current primary forecasts indicate a rising need for an additional 2 f.e. in the short term.

There are limited options for expansion on existing primary school sites in Hertford as a result of a number of town planning, site and highways constraints, and very few site options available for a new school in the town.

Feasibility work is underway to assess the capacity of the Simon Balle School site to accommodate a 2 f.e. primary school to enable the site to become an all through school. However, 2 f.e. of additional primary places would only meet current forecast demand from the existing community.

In light of the limited existing and potential capacity available across the town, HCC would request that further housing development in the town be master-planned, and would seek appropriate and adequate developer contributions to provide for the infrastructure requirements arising from future housing developments in the area.

The identification and allocation of a reserve 2 f.e. primary school site and appropriate policies that provide flexibility is required to ensure future potential primary needs can be met across the area.

### **Sawbridgeworth**

<b>Potential Development Area</b>	<b>No Dwellings</b>	<b>Nearest Primary Schools</b>
W of Sawbridgeworth	3000	HCC would expect this development to provide for its own school capacity (3.5 to 6 f.e.) so 2 or 3 school sites are required.
Sawbridgeworth N & S of West Road	200	Mandeville
Small Sites/SLAA Sites	11	Depends upon site location
<b>TOTAL</b>	<b>3211</b>	

### **3211 dwellings equates to 3.7 to 6.5 f.e.**

There is little or no capacity across the primary schools in Sawbridgeworth, with significant demand from the local area. Limited options exist for expansion on existing primary school sites in Sawbridgeworth as a result of a number of town planning, site and highways constraints.

HCC would seek appropriate and adequate developer contributions to provide for the infrastructure requirements arising from future housing developments in the area. It also requests policies within the Local Plan that provides the flexibility required to develop existing school sites where possible.

As indicated above, a development of 3000 would require its own school sites within it to meet the needs of that new community.

## Ware

<b>Scenario 1</b>		
<b>Potential Development Area</b>	<b>No Dwellings</b>	<b>Nearest Primary Schools</b>
Ware North – High Oak Road area	200	Kingshill Infants/St Mary's Junior Tower Primary
Ware – land east of Trinity Centre	81	Kingshill Infants/St Mary's Junior Tower Primary
Small Sites / SLAA Sites	146	Depends upon site location
<b>TOTAL</b>	<b>427</b>	
<b>Scenario 2</b>		
<b>Potential Development Area</b>	<b>No Dwellings</b>	<b>Nearest Primary Schools</b>
Ware North – (with High Oak Road area as subsection)	1,700	HCC would expect this development to provide for its own school capacity (2 to 3.4 f.e.) so 2 x 2 f.e. sites are required.
Ware – land east of Trinity Centre	81	Kingshill Infants/St Mary's Junior Tower Primary
Small Sites / SLAA Sites	146	Depends upon site location
<b>TOTAL</b>	<b>1927</b>	
<b>Scenario 3</b>		
<b>Potential Development Area</b>	<b>No Dwellings</b>	<b>Nearest Primary Schools</b>
Ware North – (with High Oak Road area as subsection)	1,700	HCC would expect this development to provide for its own school capacity (2 to 3.4 f.e.) so 2 x 2 f.e. sites are required #.
Ware East	1,300	HCC would expect this development to provide for its own school capacity (1.5 to 2.6 f.e.) so a 3 f.e. site is required #.
Ware – land east of Trinity Centre	81	Kingshill Infants/St Mary's Junior Tower Primary
Small Sites / SLAA Sites	146	Depends upon site location
<b>TOTAL</b>	<b>3227</b>	
<p><i>#The above calculations are based on the Areas of Search being developed in isolation and reflect the need for each individual area. This would enable either area to be brought forward independently. However, if both developments come forward in combination, which would total 3000 dwellings, there would be a need for 3.5 f.e. to 6f.e. primary schools. This would reduce the joint requirement for these two individual sites to 3 x 2f.e. sites.</i></p>		

- Scenario 1: 427 dwellings equates to 0.5 to 0.9fe**
- Scenario 2: 1927 dwellings equates to 2.3 to 3.9fe**
- Scenario 3: 3227 dwellings equates to 3.7 to 6.5fe**

Primary schools in Ware are generally at capacity. A forecast shortfall of 0.5f.e. has led to the permanent expansion of St Catherine's which, subject to town planning, will come into effect in September 2014. Forecasts suggest a further, temporary, need of up to 1 f.e. additional places in 2015.

Expansion potential at existing school sites is very limited. Any new housing development is therefore likely to generate a need for additional places and must provide appropriate and adequate infrastructure to deal with the primary population it generates.

It would be prudent to plan for 1 new 1f.e. primary school in scenario 1, two new 2 f.e. primary schools in scenario 2 and three new 2 f.e. primary schools in scenario 3.

### **East of Welwyn Garden City**

East of Welwyn Garden City	1500	HCC would expect this development to provide for its own school capacity through the provision of a 2 f.e. site with capacity to expand to 3 f.e, as/when required.
----------------------------	------	---

**1500 dwellings equates to 1.8 to 3 f.e.**

### **North of Harlow**

North of Harlow	10,000	HCC would expect this development to provide for its own school capacity.
-----------------	--------	---

**10,000 dwellings equates to 11.8 to 20 f.e.**

Primary schools should be 2 f.e. minimum in size but may be provided on 3FE sites to enable expansion as and when demand arises during the construction of the development.



## East Herts Villages

The information given below is for those villages which have been identified as potentially accommodating 10% growth.

Settlement	+ 10% dwellings	Primary Schools
Aston	23	<ul style="list-style-type: none"> <li>○ Aston St Mary's C of E (Aided)</li> </ul> Due to the low level of growth proposed capacity would not be a bar on a limited amount of development. Site in MGB.
Bayford	7	<ul style="list-style-type: none"> <li>○ Bayford (C of E) VC Primary</li> </ul> Due to the low level of growth proposed capacity would not be a bar on a limited amount of development. Site in MGB.
Birch Green	9	<ul style="list-style-type: none"> <li>○ Hertingfordbury Cowper C of E VA</li> </ul> This is a 1 f.e. school which serves a number of settlements in the local rural area. Due to the low level of growth proposed capacity would not be a bar on a limited amount of development. Site in MGB.
Braughing	34	<ul style="list-style-type: none"> <li>○ Jenyns First School and Nursery</li> </ul> Due to the low level of growth proposed capacity would not be a bar on a limited amount of development.
Buckland	7	<ul style="list-style-type: none"> <li>○ Barkway VA First School*</li> <li>○ Reed First School</li> </ul> Due to the low level of growth proposed capacity would not be a bar on a limited amount of development.
Cole Green	2	Closest school is Hertingfordbury Cowper C of E VA in Birch Green. See comments for Birch Green.
Colliers End	5	Closest school is Puller Memorial C of E VA Primary, High Cross. See comments for High Cross.
Cottered	19	Closest schools in Buntingford. See information in <b>Appendix 2</b>
Dane End	26	<ul style="list-style-type: none"> <li>○ Little Munden C of E VC Primary</li> </ul> New housing is likely to generate a need for additional places. There is no capacity or expansion potential.
Furneux Pelham	13	<ul style="list-style-type: none"> <li>○ Furneux Pelham C of E</li> </ul> Due to the low level of growth proposed capacity would not be a bar on a limited amount of development.
Hadham Ford	11	Closest school is Little Hadham Primary. See comments for Little Hadham.
Hertingfordbury	8	<ul style="list-style-type: none"> <li>○ Hertingfordbury Cowper C of E VA</li> </ul> See comments on Birch Green.
High Cross	15	<ul style="list-style-type: none"> <li>○ Puller Memorial C of E VA Primary, High Cross</li> </ul> The school has potential expansion capacity up to 1FE if adjacent land not in HCC ownership is allocated in the District Plan. Site in MGB.
High Wych	18	<ul style="list-style-type: none"> <li>○ High Wych C of E Primary</li> </ul> This school is located within the Sawbridgeworth primary planning area. Due to the low level of growth proposed capacity would not be a bar on a limited amount of development. There may be potential to expand if adjacent land not in HCC ownership is allocated in the District Plan. Site in MGB.
Hunsdon	37	<ul style="list-style-type: none"> <li>○ Hunsdon JMI</li> </ul> There may be potential to expand if adjacent land not in HCC ownership is allocated in the District Plan. Site in MGB
Letty Green	8	Closest school is Hertingfordbury Cowper C of E VA in Birch Green. See comments for Birch Green.

Little Hadham	13	<ul style="list-style-type: none"> <li>○ Little Hadham Primary</li> </ul> <p>Potential expansion capacity up to 1 f.e. if adjacent land not in HCC ownership is allocated in the District Plan.</p>
Much Hadham	52	<ul style="list-style-type: none"> <li>○ St Andrews C of E Primary Much Hadham</li> </ul> <p>Due to the low level of growth proposed capacity would not be a bar on a limited amount of development.</p>
Puckeridge	86	<ul style="list-style-type: none"> <li>○ St Thomas of Canterbury Catholic</li> <li>○ Roger De Clare C of E First School</li> <li>○ Potential to expand Roger De Clare by 1 f.e. (to 3 f.e.) if adjacent land not in HCC ownership is allocated in the District Plan.</li> </ul>
Standon	56	See comments for Puckeridge as closest schools located here.
Stanstead Abbots & St Margaret's	177	<ul style="list-style-type: none"> <li>○ St Andrews C of E Primary</li> </ul> <p>There is no capacity to accommodate children from any additional development and the site capacity will not enable expansion of the school. If any further housing is proposed a new 2 f.e. school site will be required.</p>
Spellbrook	7	<ul style="list-style-type: none"> <li>○ Spellbrook Primary</li> </ul> <p>This school is located within the Sawbridgeworth primary planning area. Due to the low level of growth proposed capacity would not be a bar on a limited amount of development. However, there are town planning challenges to the expansion of this school including noise (relating to Stansted Airport) and highways. Site in MGB.</p>
Tewin	31	<ul style="list-style-type: none"> <li>○ Tewin Cowper C of E VA Primary</li> </ul> <p>Any further development in the village will require additional school places. Potential to expand if adjacent land not in HCC ownership is allocated in the District Plan. Part of site in MGB.</p>
Thundridge	19	<ul style="list-style-type: none"> <li>○ Thundridge Primary</li> </ul> <p>Due to the low level of growth proposed capacity would not be a bar on a limited amount of development. Site in MGB.</p>
Wadesmill	14	See comments for Thundridge as closest school located here.
Walkern	51	<ul style="list-style-type: none"> <li>○ Walkern Primary</li> </ul> <p>This school is to be expanded from September 2014 subject to town planning consent. Due to the low level of growth proposed capacity would not be a bar on a limited amount of development.</p>
Watton-at-Stone	87	<ul style="list-style-type: none"> <li>○ Watton-at-Stone</li> </ul> <p>HCC hold land on adjacent site to allow school to expand.</p>
Westmill	9	Closest schools and in Buntingford and Braughing. See comments in <b>Appendix 2</b> for Buntingford and above for Braughing.
Widford	18	<ul style="list-style-type: none"> <li>○ Widford School</li> </ul> <p>Due to the low level of growth proposed capacity would not be a bar on a limited amount of development. There may be potential to expand as the school is on a large site, however, it is constrained by highway issues.</p>
Terlings Park	200	These units have been incorporated within current forecasts for primary and secondary school places. Nursery, primary and secondary contributions were sought from this development.

**Key**

MGB Metropolitan Green Belt

Dpf Detached playing field

## **Secondary Schools**

Strategic planning at secondary school level is more complex, comprising a more diverse offer of schools and with secondary aged pupils tending to travel further for their education resulting in the need to plan over a wider geographical area.

There are three secondary education planning areas within East Herts. These are:-

- Bishop's Stortford (which includes Sawbridgeworth)
- Buntingford
- Hertford and Ware

Information on each of these areas is given below.

### **Bishop's Stortford**

#### **Proposed Housing Numbers**

The proposed 150 units at Bishop's Stortford East would yield approximately 0.3 f.e. of demand, while the additional 267 units identified in the SLAA, together with the 150 at Bishop's Stortford East, equates to 0.8 f.e.

The proposed 200 units at Sawbridgeworth West A and B, together with the 11 units from the SLAA equates to 0.4 f.e. of demand.

The proposed development at Bishop's Stortford North (BSN) of 2650 dwellings equates to 5 f.e. of demand.

The proposed safeguarded land in Bishop's Stortford of 800 units post 2031 would have to be assessed nearer the time, but it is likely to yield 1.6 f.e. of school places.

#### **Secondary Schools**

The secondary education planning area of Bishops Stortford and Sawbridgeworth includes a total of 6 secondary schools currently offering 1010 Year 7 places.

Property feasibility work has been undertaken to establish the expansion potential of all of schools in the planning area. This includes town planning appraisals, transport assessments and in some cases an evaluation of site capacity. A summary of the expansion potential can be found as **Appendix 3a**.

#### **Strategy for Secondary Education provision**

Following the unsuccessful planning appeal for the relocation and co-location of The Bishops Stortford High and the Herts and Essex High Schools' on a new site at Whittington Way, HCC has been reconsidering its secondary strategy for the area, working with the secondary schools to explore alternative options for meeting future forecast demand.

Current pupil forecasts indicate a deficit of Year 7 places from 2014 and a need for an additional 2 f.e. rising to a peak of 3 f.e, in 2019/20. These forecast figures

exclude any assumed yield from the land at Bishops Stortford North, but include the other proposed housing sites expected to be completed within the lifecycle of the forecast,

HCC is seeking 5 f.e. of secondary provision within Bishops Stortford North to enable the development to provide the appropriate education infrastructure for that new community.

Until there is certainty about the outcome of proposed housing development in the north of Bishops Stortford, for which planning applications are currently under consideration by East Herts District Council, it is not considered appropriate to bring forward expansion plans for the latent demand in the town. The developments currently represent the largest development in Hertfordshire and will require new school provision within them to meet the demand generated by them. Any other demand from existing communities will need to be dealt with as required but the options for doing so can only be finalised once proposals for the new development have been settled.

It should be noted that the nature and complexity of the secondary school sites across the area means that the development of the existing school sites represents a significant challenge and, until development options are explored and tested in detail through the town planning system, there is a high risk that expansion capacity may not be achievable either in physical or financial viability terms.

Furthermore, all schools in the Bishops Stortford and Sawbridgeworth planning area are their own admitting authorities and, with a variety of admissions arrangements, recruit from a wide geographical area. The Local Authority (HCC) acts in a commissioning role and has no control over the school's admissions arrangements. The County Council has no power to require the schools to expand or to change their admissions arrangements.

With regard to the HCC owned site in Hadham Road, until there is clarity around the expansion potential of the existing schools, Policy BIS7 should be retained.

## **Buntingford**

### Proposed Housing Numbers

The proposed housing allocations excluding the safeguarded land, totals 470 units which equates to almost 1 f.e. of demand. If the 44 SLAA units are included this would bring the total number of units to 514, which is just over 1 f.e. of demand.

The need for school places arising from the proposed safeguarded land of 400 units post 2031 would have to be assessed nearer the time. However, it is likely to yield 1 f.e. of secondary school places.

### **Secondary Schools**

Buntingford operates a three tier education system, with both middle schools (years 7 and 8) and the upper school (years 9 to 11 + sixth form) providing secondary

places. The middle schools serving this school place planning area are Edwinstree C of E in Buntingford and Ralph Sadleir in Puckeridge. The upper school, Freman College, is located in Buntingford.

Property feasibility work has been undertaken to establish the expansion potential of all of these schools. The conclusions around this can be found in the table at **Appendix 3b**.

#### Conclusion on Buntingford secondary

Although forecasts indicate a small shortage of places in both the middle and upper schools, the schools attract pupils from both Stevenage and Royston, both of which have sufficient school places in the short term. To add more places would draw more pupils from those communities. There are sufficient places in the Buntingford schools currently to cater for local demand from the existing community.

However, future housing growth is likely to increase demand for places in these schools and HCC would seek appropriate and adequate developer contributions to provide for the infrastructure requirements arising from future housing developments in the area, and also requests policies within the Local Plan that provide the flexibility to develop existing school sites where possible and necessary.

### **Hertford and Ware**

#### Proposed Housing Numbers

In Hertford, the proposed housing at the Former Hertford Police Station site and in Ware to the East of the Trinity Centre has been included within current forecasts for secondary school places.

The total of 1715 units proposed for Hertford would yield a demand for school places of around 3.4 f.e. to 2026. In Ware the proposed development of 200 units at Ware North would yield 0.4 f.e. of need and the SLAA units of 146 would yield 0.3 f.e.

In total there would be a demand for 4.1 f.e. of secondary school places arising from the proposed housing in both towns.

#### Secondary Schools

This secondary school planning area includes Hertford, Ware and the surrounding villages. There are five secondary schools covering this area including a single sex boy's school in Hertford (Richard Hale) and a single sex girl's school in Ware (Presdales). There is movement of students between the two towns which generally relates to attendance of the single sex schools.

Limited feasibility work has been undertaken to establish the expansion potential of these schools. A summary of the schools and their sites can be found in the table at **Appendix 3c**.

## Conclusion on Hertford and Ware secondary

The majority of the secondary schools within Hertford and Ware are located within the Green Belt or identified as sites which have a MDS designation. Both these policies can be restrictive when assessing expansion capacity potential at school sites and it would be considered useful if these boundaries could be reassessed and a more flexible policy approach made available for the future.

Some feasibility work is being undertaken to determine the potential of the existing secondary schools to expand. However, until all schools have been assessed additional capacity, if any, that could be accommodated within existing sites is not known. Therefore, as the proposed housing is likely to yield 4FE of demand it would be prudent to seek a land allocation for a secondary school site in the Hertford and Ware area to ensure potential school provision is secured for the future.

### **North Ware**

A proposal for 1500/1700 dwellings to the north of Ware would generate approximate need of 3.5 f.e. of secondary school places. It is assumed that this need could not be accommodated within the existing secondary schools in Ware and Hertford and a new school site would therefore be required to meet the need from this development. The provision of an all-through school within the development could be considered an option as a way of managing the primary and secondary pupil yield arising from this new housing.

### **Other sites**

#### **East of Welwyn Garden City**

There is a proposal by Lafarge Tarmac to actively promote land at Cole Green and land at Birchall Farm as a new strategic allocation within the district of Welwyn and Hatfield. The proposal is to create a new garden suburb for Welwyn Garden City for 2500 dwellings which would be known as Birchall Garden Suburb. This land allocation is on the boundary with East Herts and it is proposed that approximately half of the total number of proposed dwellings would be located on land within East Herts and could thus be considered to have an impact on education provision within the district.

In light of the scale and location of this development, HCC expects the development to provide its own school infrastructure for the new communities.

It would generate the need for a 4 f.e. secondary school (with flexibility to expand if required in the future), and two new 2 f.e. primary schools with the provision for at least one to be flexible to expand to 3 f.e. if required in the future. Opportunities for an 'all through school' could be considered.

#### **Gilston and Eastwick**

The 200 units proposed at Terlings Park would generate between 0.23 and 0.4 f.e. Nursery, primary and secondary developer contributions have been sought from this development.

The large scale proposed development for 10,000 dwellings at Harlow North would be expected to provide its own school infrastructure within the development, with provision for 20 f.e. of secondary school capacity. It is likely that 3 x 7 f.e. secondary schools would be needed. These could be provided as 2 x 7 f.e. schools with a reserve site to be developed as and when the additional demand arises from the development.

### **East Herts Villages**

There is proposed growth of 862 dwellings within the villages in East Herts. **Appendix 4** uses the school census data from January 2011 to identify the pupil yield from the suggested developments. In total it is anticipated that the proposed additional dwellings will produce an estimated requirement of approximately 1.8 f.e. of need.

Report Authors:  
Andrea Gilmour  
Bethan Clemence  
Kate Ma

16 September 2013

## **Appendix 1**

### **School Expansions Process – School enlargement (prescribed alteration)**

- Identification of need
  - Meeting the Rising Demand for School Places
  - Pupil forecasts
  - Engage with local Head Teacher groups
  
- Analysis of need in identified areas
  - Analysis of demand
  - Property feasibility work on potential for school sites to expand
  - Work with multi-disciplinary teams to identify possible options
  - Engage with schools in area of need to explore options
  
- Options Recommendation & decision to consult
  - Assessment of options against the Director's Four Tests which considers whether the options:
    - Provide the right number of places in the right place to meet demand
    - Enhance capacity to raise educational standards, reduce risk of under-performance or serious weakness, and offer extended schools
    - Have acceptable implications for building design, environmental impact, and cost
    - Have acceptable transitional arrangements for affected pupils
  
- Statutory consultation on enlargement proposal
  
- Engagement with School on building design for enlargement
  
- Formal statutory decision taken by County Council
  
- Submission of town planning application for building enlargement, including external play areas and associated car parking requirements
  
- Project completion and additional places made available



## Appendix 2

### Current and Potential Capacity in East Herts Primary Schools

School planning areas	School	School Type	Current Capacity	Expansion Capacity	Comments	Additional information
Bishop's Stortford	All Saints CofE	VA	1FE	0	No expansion potential	
	Hillmead	Community	1FE	0	No expansion potential	Expansion potential to 2FE if adjacent land not in HCC ownership allocated in LDF. Need to investigate further.
	Manor Fields	Community	2FE	0	No expansion potential	
	Northgate	Academy	2FE	0	No expansion potential	
	Richard Whittington	Community	1½FE	0	No expansion potential	Already has dpf at former Havers School
	St Joseph's Catholic	VA	1½FE	0	No expansion potential	Further investigation needed to assess expansion potential to 2FE.
	St Michael's CofE	VA	1FE	0	No expansion potential	
	Summercroft	Academy	2FE	+1FE	Located on a large site.	Further investigation needed to assess if possible to expand. Likely to be highways issues due to site access.
	Thorley Hill	Community	1FE	0	No expansion potential	.
	Thorn Grove	Community	1FE	0	No expansion potential	
Hertford	Windhill Primary & Nursery	Community	2FE	0	No expansion potential	
	Abel Smith	Community	1FE	0	No expansion potential	Significant site constraints
	Bengeo	Community	2FE	0	No expansion potential	Possible expansion potential to 3FE with use of EHDC dpf + parent drop off on site. Need to investigate further.
	Hertford St Andrews CofE	VC	1FE	0	No expansion potential	
	Hollybush	Community	1FE	+1FE	Has some spare capacity in existing buildings for temporary expansion.	May be possible to expand to 2FE with two storey building/MUGA or potential joint facilities with adjacent Sele School
	Mill Mead	Community	1FE	0	No expansion potential	Significant site constraints
	Morgans	Community	2FE	+1FE	Site large enough to accommodate additional development. MGB + listed building. Maybe Sport England issues.	
	St Joseph's Catholic	VA	1FE	0	No expansion potential	
Wheatcroft	Community	1½FE	0	Site only capable of expansion to 2FE with dpf.	In light of constrained nature of site previous options around expansion	

School planning areas	School	School Type	Current Capacity	Expansion Capacity	Comments	Additional information
						development proved not cost effective.
Ware	Christ Church (CofE) VA Primary & Nursery	VA	1½FE	0	No expansion potential	Constrained site. Highways issues, adjacent listed building.
	Kingshill Infant/St Mary's Jr	Community /VC	2FE	0	No expansion potential	
	Priors Wood	Community	1FE	0	No expansion potential	Possible expansion potential if adjacent land not in HCC ownership allocated in LDF. Highways issues – alternative site access would be required.
	Sacred Heart Catholic	VA	1FE	+1FE	Site located in area at risk of flood but large site.	Feasibility required.
	St Catherine's (CofE)	VC	1½FE	+½FE	Proposed expansion to 2FE in September 2014	No further potential beyond 2FE.
	St John The Baptist VA CofE	VA	1FE	0	No expansion potential	
	Tower	Community	1FE	0	To expand by 1FE dpf needed + 2 storey building and MUGA.	Constrained site. Would be town planning issues with any expansion.
Sawbridge worth	Fawbert & Barnard Infant's	Community	2FE	0	No expansion potential	Linked to Reedings Junior
	High Wych CofE	VC	1FE	0	No expansion potential	Possible expansion potential if adjacent land not in HCC ownership allocated in LDF. Need to investigate further as could be noise and highways issues.
	Mandeville	Community	1FE	0	No expansion potential	Expansion potential if adjacent land not in HCC ownership allocated in LDF. Need to investigate further as could be noise and highways issues.
	Reedings Junior	Community	2FE	0	No expansion potential	Linked to Fawbert & Barnard Infants
	Spellbrook	VC	½FE	0	No expansion potential	Town planning challenges to any expansion include highways and noise issues from Stansted Airport. Need to investigate further.
Villages						
The Pelhams	Albury C of E (VA)	VA	PAN 10	0	No expansion potential	
	Furneux Pelham CofE	VC	PAN 20	0	No expansion potential	

School planning areas	School	School Type	Current Capacity	Expansion Capacity	Comments	Additional information
The Hadhams	Little Hadham	Community	PAN20	0	No expansion potential	Potential to expand to 1FE if adjacent land not in HCC ownership allocated in LDF to allow school to expand.
	St Andrew's CofE Primary & Nursery, Much Hadham	VA	1FE	0	No expansion potential	
Watton District North	Little Munden CofE VC	VC	PAN 25	0	No expansion potential	
	Watton at Stone Primary & Nursery	Community	PAN 34		HCC hold land in reserve on adjacent site to allow school expansion	
Ware Villages	Hunsdon JMI	Community	1FE	0	No expansion potential	Possible expansion potential if adjacent land not in HCC ownership allocated in LDF. Need to investigate further.
	Puller Memorial CofE VA	VA	½FE	0	No expansion potential	Possible expansion potential if adjacent land not in HCC ownership allocated in LDF. Need to investigate further.
	St Andrew's CofE (VC), Stanstead Abbots	VC	1FE	0	No expansion potential	
	Thundridge	VC	PAN12	0	No expansion potential	
	Wareside CofE	VC	PAN 8	0	Large site but highways issues due to location.	
	Widford	Community	PAN 8	0	Large site but highways issues due to location.	
Hertford South Villages	Bayford (CofE) VC	VC	½FE	0	No expansion potential	Possible expansion potential if adjacent land not in HCC ownership allocated in LDF. Need to investigate further.
	Hertford Heath	Community	1FE	0	No expansion potential	
Watton District South	Hertingfordbury Cowper CofE VA	VA	1FE	0	No expansion potential	
	Stapleford	VA	PAN 12	0	No expansion potential	
	Tewin Cowper CofE VA	VA	PAN 22	0	No expansion potential	Possible expansion potential if adjacent land not in HCC ownership allocated in LDF. Need to investigate further.
	Tonwell St Mary's CofE	VC	PAN 8	0	No expansion potential	
Stevenage	All Saints CofE (VA) Primary	VA	PAN 25	0	No expansion potential	

School planning areas	School	School Type	Current Capacity	Expansion Capacity	Comments	Additional information
South East Villages	Datchworth					
	Aston St Mary's CofE (Aided)	VA	PAN 20	+10 spaces	Potential to become 1FE but constraints include highways issues	Feasibility required.
	Benington CofE	VC	PAN 16	0	No expansion potential - highway issues	
Buntingford	Ardeley St Lawrence	VA	PAN 18	0	No expansion potential	
	Layston CofE First	VC	1FE	+1FE	Site size sufficient for 2FE	.
	Millfield First & Nursery	Community	1½FE	+½FE	No expansion potential	Potential to expand to 2FE if adjacent land not in HCC ownership allocated in LDF/detached playing field provided
	Roger de Clare CofE (VC) First & Nursery	VC	2FE	0	No expansion potential	Potential to expand if adjacent land not in HCC ownership allocated in LDF.
Puckeridge	St Thomas of Canterbury Catholic	VA	PAN 15			
	Anstey First School	Community	PAN 10	0	No expansion potential	
	Hormead CofE (VA)	VA	PAN 20	0	No expansion potential	Potential to expand to 2FE if adjacent land not in HCC ownership allocated in LDF. May be highways issues as site located some distance from settlements. Need to investigate further.
Other Villages	Jenyns First Braughing	Community	PAN 21	0	No expansion potential	
	Walkern	Community	PAN 15	+10	It is proposed to expand this school by 10 places in September 2014.	

## Key

Dpf Detached playing field

VA Voluntary Aided

VC Voluntary Controlled

Date September 2013

### Appendix 3

#### Tables 3a-c: Secondary Schools

**Table 3a: Bishops Stortford (incl. Sawbridgeworth)**

School/Land Option	Type	Current Capacity (FE)	Potential Expansion Capacity (FE)	Comments / Details
Hockerill Anglo-European College	Academy	4	None	<ul style="list-style-type: none"> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> <li>No expansion potential at the school; team games playing area of insufficient size and cannot be increased without a reduction in site size standards.</li> </ul> <p>Other constraints:</p> <ul style="list-style-type: none"> <li>Conservation Area</li> <li>Main building Grade II listed</li> <li>Right of Way runs through site</li> </ul>
St Mary's Catholic School	Voluntary Aided	5.1	Possibly +1	<ul style="list-style-type: none"> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> <li>Very challenging as site is constrained in terms of size and there is limited scope for enlarging school site. Potential expansion may be possible subject to a range of highways mitigation measures but further feasibility required to test.</li> </ul>
Birchwood High School	Academy	8	Possibly +1	<ul style="list-style-type: none"> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> <li>Possible to expand school by 1fe on existing site but with a reduction in site standards beyond 15%/provision of additional MUGA</li> <li>Highways mitigation measures required, including car parking and works to the Parsonage Lane/A1250 Dunmow Road roundabout.</li> <li>Expansion may be possible subject to town planning and highways mitigation measures but further feasibility required to test potential.</li> </ul>

School/Land Option	Type	Current Capacity (FE)	Potential Expansion Capacity (FE)	Comments / Details
The Hertfordshire and Essex High School	Foundation (Academy conversion pending)	5.3	Possibly +1	<ul style="list-style-type: none"> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> <li>School currently has detached playing fields at Beldams Lane.</li> <li>School site very challenging as size is small, very developed and there is limited scope for enlarging site unless additional land is acquired in order to expand the site or make available further detached playing fields.</li> <li>Highways mitigation measures would be required to reduce the residual and safety impact of additional traffic.</li> <li>Further feasibility required to test potential.</li> </ul>
Bishops Stortford High School	Foundation	5.1	0.9	<ul style="list-style-type: none"> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> <li>Very challenging as site is constrained due to its small size and topography, whilst playing field and hard play is designated open space and part of playing field is in an Area of Archaeological Significance.</li> <li>Potential expansion subject to provision of additional playing fields (in addition to the existing detached playing field at Jobbers Wood).</li> <li>Highways mitigation measures would be required, although this would only marginally improve the existing traffic conditions in the vicinity of the site.</li> <li>Further feasibility required to test potential</li> </ul>
Leventhorpe	Academy	6	Possibly up to 3	<ul style="list-style-type: none"> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> <li>School site is located in the Green Belt with hard play and playing fields designated as protected open space.</li> <li>Agricultural land to the north is designated under Policy SA4 (Sports Pitch provision) in the East Herts Local Plan. Some of this land has recently been purchased by the school, with the remaining under option.</li> <li>Potential expansion by up to 3fe subject to use of purchased land and highways mitigation measures, including junction improvements.</li> <li>Further feasibility required to test potential.</li> </ul>

**Table 3b: Buntingford**

School/Land Option	Type	Current Capacity (FE)	Potential Expansion Capacity (FE)	Comments
Freman College	Academy	7	2	<ul style="list-style-type: none"> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> <li>The site is located within the planning policy area 'Rural Area Beyond the Green Belt' with the majority of the area occupied by the school buildings identified as a Major Developed Site (MDS).</li> <li>Expansion could be achieved subject to town planning and highways mitigation measures.</li> <li>Initial feasibility work has concluded that it may be possible to expand the school but that part of the proposed Buntingford North site may be required for additional development of the school site, playing fields and/or further access to the site linking to Ermine Street.</li> <li>Use of EHDC Pay &amp; Display car park on Bowling Green Lane as a park and stride would help in minimising the impact of any additional traffic resulting from expansion.</li> </ul>
Edwinstree C of E Middle	Voluntary Controlled	3.7	1.3	<ul style="list-style-type: none"> <li>Expansion could be achieved subject to town planning and highways mitigation measures.</li> <li>Expansion would require use of an All Weather Pitch and/or use of the adjacent EHDC recreation ground as a detached playing field.</li> <li>Use of EHDC Pay &amp; Display car park on Bowling Green Lane as a park and stride would help in minimising the impact of any additional traffic resulting from expansion.</li> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> </ul>
Ralph Sadleir Middle	Community (Academy conversion pending)	3	2	<ul style="list-style-type: none"> <li>The school does not currently have sufficient accommodation to facilitate an increase in pupil numbers and therefore additional buildings would be required.</li> <li>Expansion by 1 or 2FE would be possible subject to town planning and highways mitigation measures</li> </ul>

Table 3c: Hertford and Ware

School/Land Option	Type	Current Capacity (FE)	Potential Expansion Capacity (FE)	Comments
Simon Balle School	Foundation (Academy conversion pending)	5.5		<p>This is a 5.5FE co-educational secondary school located in Hertford. Very little feasibility work has been undertaken to assess secondary expansion capacity in this area. The school does not currently have sufficient accommodation to facilitate a permanent increase in pupil numbers by whole forms of entry, and therefore additional buildings would be required.</p> <p>This site is currently located within the Metropolitan Green Belt. Although part of the site is identified as a MDS this area is quite restrictive and means that currently if the school were to be expanded 'very special circumstances' would need to be demonstrated. It would be helpful if the site could either be excluded from the Green Belt or the MDS boundary expanded to provide a realistic footprint within which further development could be provided.</p>
Richard Hale	Academy	5.5		<p>The school is a 5.5FE single sex boy's secondary school located in Hertford. Very little feasibility work has been undertaken to assess secondary expansion capacity in this area. The school does not currently have sufficient accommodation to facilitate a permanent increase in pupil numbers by whole forms of entry, and therefore additional buildings would be required.</p> <p>The school already has a detached playing field located in Morgans Walk. A town planning appraisal has been undertaken for this site which identifies that there is limited potential to expand the school. The provision of facilities such as an all weather pitch may help in freeing up some of the existing playing fields for development. Further work would be required to establish the potential of this school to expand.</p>
The Sele School	Academy	5		<p>The school is a co-educational secondary located in Hertford currently offering 150 Year 7 places. Very little feasibility work has been undertaken to assess secondary expansion capacity in this area. The school does not currently have sufficient accommodation to facilitate a permanent increase in pupil numbers by whole forms of entry, and therefore additional buildings would be required.</p> <p>This site is currently located within the Metropolitan Green Belt which would appear to be an anomaly. This site has clearly defined boundaries within the urban area. To the west is Thieves Lane; Welwyn Road, with housing development beyond, is located to the north; Hollybush primary school (also in the Green Belt) and housing</p>



			<p>in Fordwich Rise are located to the east; and residential development in Turpins Close and Ladywood Road is to the south. Although part of the site is identified as a MDS this area is quite restricted and means that currently if the school were to be expanded 'very special circumstances' would need to be demonstrated. It would be helpful if the site could either be excluded from the Green Belt or the MDS boundary expanded to provide a realistic footprint within which further development could be provided.</p> <p>A Transport Statement was produced in 2010 which assessed the implications of a 1FE expansion of Hollybush Primary School, assessing the site alongside adjacent Sele School. This concluded the highways network was capable of some expansion. Further work would be required to establish the potential of this school to expand.</p>
Presdales School	Academy	5.5	<p>The site is located in Ware and is a single sex girl's school offering 168 Year 7 places. Very little feasibility work has been undertaken to assess secondary expansion capacity in this area.</p> <p>The school does not currently have sufficient accommodation to facilitate a permanent increase in pupil numbers by whole forms of entry, and therefore additional buildings would be required.</p> <p>This site is currently located within the Metropolitan Green Belt, with the area containing the majority of the school buildings identified as a MDS. This boundary needs updating as a sports hall has been constructed on the site of the former tennis courts located to the east of the swimming pool. In addition, the MDS area is quite restrictive and means that currently if the school were to be expanded 'very special circumstances' would need to be demonstrated. It would be helpful if the site could either be excluded from the Green Belt or the MDS boundary expanded to provide a realistic footprint within which further development could be provided. Further work would be required to establish the potential of this school to expand. This should include a transport assessment, since the school is accessed via Hoe Lane, a narrow lane with no capacity for widening immediately to the south of the school.</p>
Chauncy School	Academy	5.3	<p>The site is located in Ware and is a 5.3FE co-educational secondary school. Very little feasibility work has been undertaken to assess secondary expansion capacity in this area.</p> <p>The school does not currently have sufficient accommodation to facilitate a permanent increase in pupil numbers by whole forms of entry, and therefore additional buildings would be required. Further work would be required to establish the potential of this school to expand.</p>

**Appendix 4  
Impact Upon Secondary School Places of +10% Growth in Identified Villages**

**Table 1 – Secondary School Planning Areas Affected by Possible +10% Growth in Identified Villages**

<b>Area of Search No</b>	<b>Settlement Name</b>	<b>+10% dwellings on 2011 Census figure</b>	<b>Secondary schools attended*</b>
23	Aston	23	Buntingford
24	Bayford	7	Hertford & Ware
26	Birch Green	9	Hertford & Ware
27	Braughing	34	Buntingford/ Bishop's Stortford
29	Buckland	7	Buntingford
30	Cole Green	2	Unknown
31	Colliers End	5	Hertford
32	Cottered	19	Buntingford
33	Dane End	26	Hertford & Ware
35	Furneux Pelham	13	Bishop's Stortford
37	Hadham Ford	11	Bishop's Stortford
39	Hertingfordbury	8	Hertford & Ware
40	High Cross	15	Hertford & Ware
41	High Wych	18	Sawbridgeworth
42	Hunsdon	37	Hertford & Ware
43	Letty Green	8	Potter's Bar/Ware
44	Little Hadham	13	Bishop's Stortford
45	Much Hadham	52	Bishop's Stortford
46	Puckeridge	86	Buntingford/Ware/Bishop's Stortford
47	Spellbrook	7	Bishop's Stortford/Sawbridgeworth
48	Standon	56	Buntingford/Ware
49	Stanstead Abbots	177	Hoddesdon/Ware
51	Tewin	31	Hertford & Ware
52	Thundridge	19	Hertford & Ware
54	Wadesmill	14	Hertford & Ware
55	Walkern	51	Buntingford/Stevenage
57	Watton at Stone	87	Hertford & Ware
58	Westmill	9	Buntingford
59	Widford	18	Hertford & Ware/ Bishop's Stortford
		<b>862</b>	

Based on School Census January 2011 information previously provided to EHDC

**Table 2 – Potential Need for Secondary School Places from Possible +10% Growth in Villages**

Secondary school planning area	Total no dwellings proposed	Pupil yield*	FE required**
Bishop's Stortford (includes Sawbridgeworth )	169	71	0.34
Buntingford	158	66	0.31
Hertford & Ware	416	175	0.83
Hoddesdon	88	37	0.18
Potter's Bar	4	2	0
Stevenage	25	11	0.05
Unknown	2	1	0
<b>Total</b>	<b>862</b>	<b>363</b>	<b>1.71</b>

\*Pupil yield is based on 500 dwellings yielding 1FE or 210 children longitudinal FE which equates to 42 children per 100 units or 0.42 children per dwelling.

\*\*FE required calculated by dividing child yield by 210.

This page is intentionally left blank

## East Herts Strategic Sites: Deliverability Advice Project Engagement Plan (August 2013)

### 1 INTRODUCTION

East Hertfordshire District Council (EHDC) has recently requested ATLAS to provide independent advice to help prepare their District (Local) Plan. The purpose of this Project Engagement Plan (PEP) is to set out:

- **The role & purpose of ATLAS**, including the team's overall vision and objectives;
- **Operating principles** including our approach to Quality Assurance and project disengagement;
- **Engagement expectations** of both ATLAS and the LPA;
- An initial **project appreciation** and the key planning & development issues; and
- The **ATLAS response**, with respect to the team members assigned to the project, defined tasks, and anticipated outcomes.

This document represents the formal record of ATLAS engagement, and should be treated as a 'live' document that will need to be updated as the project progresses. It has no formal statutory or legal status but in effect sets out a basic Memorandum of Understanding between EHDC and ATLAS as to how ATLAS will engage and provide support in respect of the project.

### 2 THE ROLE & PURPOSE OF ATLAS

The following overall mission statement underpins the operation of the ATLAS service:

*"To secure the timely delivery of high quality sustainable development through effective planning processes, collaborative working and the promotion of good practice."*

This vision will be met by addressing the following objectives:

- Acting to provide help and support to Local Planning Authorities (LPAs) that are dealing with issues and challenges related to large scale growth;

- Bringing an impartial and independent perspective on issues;
- Helping local planning authorities to develop better and more consistent interaction with the key stakeholders;
- Ensuring the lessons learnt from ATLAS's work are disseminated widely to local planning authorities and the wider development community; and
- Contributing to the establishment of a collaborative planning system based on the principles of holistic sustainable development, spatial planning and development management.

### 3 ATLAS OPERATING PRINCIPLES

The following core principles underpin the nature of ATLAS engagement in project work:

- ATLAS only work where the LPA requests support;
- ATLAS provides an 'enabling service' taking the role as "critical friend" of the Local Planning Authority (LPA);
- Whilst working with the LPA first and foremost, ATLAS will endeavour to work openly with other key stakeholders in particular the private sector to build trust and ability to influence;
- The LPA or any other project partner is under no statutory obligation to follow the advice we provide;
- The advice we provide will be impartial and independent – we will say it as we see it which may or may not support the position being taken by any specific stakeholder (including the LPA);
- Advice we provide will be for the benefit of all, under an overall ethos that the 'project' is the client;
- ATLAS will aim to enable and support the project partners to deal with and resolve issues as they arise based on the knowledge and experience of the team;
- ATLAS does not provide a direct case officer style resource, although will in some cases offer to undertake specific pieces of work if the project requires it;

- ATLAS promotes that a collaborative, open and transparent process is followed by all parties where possible;
- ATLAS will not charge for its services;
- ATLAS is engaged in many active projects at any given time and draws upon its project work in order to inform its activities, to continually improve the ATLAS offer, and to disseminate best practice. ATLAS may therefore from time to time wish to utilise aspects of project work as case study material, which may necessitate a project being identified. ATLAS will however always strive to maintain the anonymity of individuals involved with a project when requested to do so;
- ATLAS will always endeavour to provide it's independent opinion, but will not be the final decision maker on issues. These must reside with the relevant body. In particular, local democratic processes remain unaffected; and
- ATLAS retains the right to disengage from any project without recourse, but will only do so under certain circumstance (see below).

#### **ATLAS Quality Assurance**

ATLAS is committed to providing a quality professional service and has several processes in place to evaluate the delivery of the service. Such measures include:

- An independent evaluation process whereby all ATLAS project partners are interviewed regularly (by external independent consultants) to assess ATLAS performance against defined tasks;
- An opportunity for project partners to provide feedback directly to ATLAS on performance at any time during project engagement; and
- A formalised disengagement process to consider the overall value of ATLAS engagement and any lessons-learned.

#### **Disengagement**

ATLAS reserves the right to disengage from any project although would seek to ensure that this only occurs where and when appropriate, most likely under the following circumstances:

- All ATLAS tasks are completed;
- The project ceases to be being pursued;
- If tasks are proving unachievable or taking an unreasonable level of resource compared to project progress or added value;
- Lack of trust or support of ATLAS advice; or
- On request of the Local Authority who retains the right to at any time request ATLAS to disengage.

## **4 ENGAGEMENT PRINCIPLES & EXPECTATIONS**

#### **Expectations of ATLAS**

LPA's and other project partners can expect the following from ATLAS staff during the course of engagement:

- ATLAS will seek to formally agree and record tasks and activities as required by the project;
- ATLAS will respond to requests for assistance in a reasonable and timely manner;
- Before using any aspects of a live or closed project for wider dissemination, ATLAS will seek to ensure that the LPA is comfortable with this;
- ATLAS will endeavour to provide advice and assistance based on good and best practice; and
- ATLAS will operate with discretion and courtesy; and will provide honest and open advice at all times.

#### **Expectations of the LPA**

By engaging with ATLAS, the following will be expected from the LPA:

- The LPA will act in an honest and transparent manner, ensuring that ATLAS is aware of and if necessary involved in all matters that will influence the tasks ATLAS have been set or the progression of the project;
- Where necessary the LPA will facilitate ATLAS engagement with other LA corporate and partner organisations and individuals when requested and as necessary to assist project progression;
- The LPA will be required to respond to and engage with an independent evaluation process of ATLAS on request by consultants appointed to undertake this task on an ongoing basis;
- On disengagement, the LPA will be requested to complete a proforma to review the scope and quality of ATLAS engagement and in the majority of cases attend a formal disengagement meeting;
- The LPA should endeavour to learn and build their knowledge and internal capacity through ATLAS engagement.

## 5 PROJECT APPRECIATION

Considerable work has been done by EHDC and their partners to evolve a planning document that will achieve sustainable development and shape the future of East Herts to 2031.

In light of ongoing planning reform and changes to the procedures relating to plan making, EHDC are in the process of preparing a District (Local) Plan. This will set out the overall planning strategy to meet the needs of East Herts and its residents including identifying the principles of development and where new development will be located for the future.

In preparing the Plan, the Council is taking a stepped approach and has prepared a Strategy Supporting Document to assist in honing down its proposals in a logical fashion. The Council are now intending to prepare a Preferred Strategy for initial consideration by

Members in Autumn 2013, prior to moving forward with further work and formal public consultation at a later date.

The scale of growth brings forward a very wide range of challenges and involves a considerable amount of work to test the suitability of alternative options. This includes background work across a range of environmental, social, economic and demographic factors.

One particular area which has been highlighted and where ATLAS support has been requested relates to how to consider aspects relating to the deliverability of potential strategic sites, especially under situations where options have specific infrastructure implications, notably transport and education.

As such, independent advice has been sought from ATLAS specifically relating to infrastructure deliverability, to help learn from other project experiences elsewhere and provide impartial support to help the Council and key external stakeholders move the process forward.

## 6 THE ATLAS RESPONSE

### Proposed ATLAS Team

Based upon an understanding of the issues, ATLAS proposes to assign the following team to assist EHDC in this project:

- **Rob Smith** (Spatial Planning Manager) will act as the key liaison and project manager on behalf of ATLAS and will provide planning and process advice;
- **Graham Harrington** (Spatial Planning Manager) will support Rob in the provision of planning and process advice.

In addition, should the need arise during the course of the project, ATLAS may also call on specialist technical assistance available within the team, in particular in respect of the approach to infrastructure matters.

**Office Address:**

HCA Advisory Team for Large Applications  
 406-412 Midsummer Boulevard  
 Milton Keynes, MK9 2EA

Rob Smith:  
[rob.smith@hca.gsi.gov.uk](mailto:rob.smith@hca.gsi.gov.uk)

Graham Harrington  
[graham.harrington@hca.gsi.gov.uk](mailto:graham.harrington@hca.gsi.gov.uk)

**ATLAS Tasks**

Clearly the work that EHDC are undertaking to prepare a District (Local) Plan is complex and involves many themes and workstreams. ATLAS support will not be provided to consider the general approach to plan making, or the robustness of technical aspects of the evidence base. The scope of support will be targeted at the key infrastructure and site deliverability considerations at emerging potential strategic sites only. The proposed tasks are set out in the table below.

The support will be provided on a time-limited basis up to the point of initial consideration of the EHDC approach by Members anticipated for Autumn 2013. Engagement could be extended subject to agreement and ability of ATLAS to add value going forward.

ATLAS Tasks	
<b>1</b>	<p><b>Task:</b> Draw knowledge from comparable projects and experiences  <b>Description:</b> Other projects and Local Authorities have been considering issues relating to large scale growth, and transferrable lessons will be shared.  <b>Task Manager:</b> Rob Smith  <b>Estimated Completion:</b> Oct 2013</p>
<b>2</b>	<p><b>Task:</b> Provide advice on infrastructure deliverability and plan making  <b>Description:</b> Help shape the approach to consideration of infrastructure deliverability, reflecting upon the current available information and potential requirements of the plan making system.  <b>Task Manager:</b> Rob Smith</p>

Estimated Completion: Oct 2013	
<b>3</b>	<p><b>Task:</b> Support partners to find ways forward to consider key infrastructure and site deliverability issues  <b>Description:</b> Consider available information of particular significance to deliverability and work with relevant public and private sector key stakeholders to find ways forward. Attending, engaging and potentially facilitating (as an impartial third party) meetings to help the relevant parties consider issues, notably in respect of transport and education infrastructure.  <b>Task Manager:</b> Rob Smith  <b>Estimated Completion:</b> Oct 2013</p>

**Anticipated Outcomes**

Project partners will be contacted as part of the independent evaluation process through which the impact of ATLAS support is assessed with reference to a number of general “added value measures”.

ATLAS support would be anticipated specifically to have positive impacts across the following defined measures:

Added Value	Definition
<b>Improving project management</b>	Improving project management processes and procedures within Local Planning Authorities (LPA) and across the other partners involved in delivering projects
<b>Resolving critical blockages</b>	Enabling partners to clarify and address key blockages
<b>Improving relationships</b>	Improving relationships between key stakeholders and the way they interact with each other
<b>Increasing capacity to deal with large scale development</b>	Building confidence, skills and knowledge in the individuals, and, when requested, the organisations involved to enable them to make more effective and efficient decisions in future





## East Herts Strategic Sites Deliverability Advice Note

17-09-13

### 1. Introduction

This note sets out advice to East Herts District Council (EHDC) on key infrastructure and site deliverability considerations at emerging potential strategic sites, in accordance with the Project Engagement Plan (PEP) August 2013. It focuses on the first two ATLAS tasks that are established in the PEP, namely to:

- Draw knowledge from comparable projects and experiences (sharing transferrable lessons from other projects and Local Authorities that have been considering issues relating to large scale growth); and
- Provide advice on infrastructure deliverability and plan making (helping shape the approach to consideration of infrastructure deliverability, reflecting upon the current available information and potential requirements of the plan making system).

The third task, to support partners to find ways forward to consider key infrastructure and site deliverability issues, is the subject of on-going meetings with key relevant public and private sector partners.

In the time available, ATLAS has not reviewed EHDC's existing or emerging evidence base.

In this note, the term 'strategic site' refers to both Strategic Site Allocations and Broad Locations.

### 2. Deliverability and Soundness

Section 20(5) of the 2004 Act provides that the purpose of an independent examination in to a Local Plan is to determine in respect of the development plan document:

- whether it satisfies the requirements of sections 19 and 24(1), regulations under section 17(7) and any regulations under section 36 relating to the preparation of development plan documents; and
- whether it is sound.

'Soundness' is not defined in legislation. However, the tests of soundness are set out in the NPPF (para 182). This states that to be sound a plan has to be positively prepared, justified, effective and consistent with national policy.

**Positively Prepared:** based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

The Planning Advisory Service (PAS) 'Soundness Self-assessment Checklist' (January 2013) takes this to mean that the plan should be 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.

**Justified:** the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

The PAS Checklist takes this to mean that the plan should be:

- based on a robust and credible evidence base involving research/fact finding, with the choices made in the plan being backed up by facts and evidence of participation of the local community and others having a stake in the area; and
- that it provides the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

**Effective:** deliverable over its period based on effective joint working on cross-boundary strategic priorities.

The PAS Checklist takes this to be that the plan should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.

It also makes clear that the plan should be flexible and able to be monitored.

### **3. General guidance on deliverability**

#### **National Planning Policy Framework (NPPF)**

Key references to allocations/broad locations, delivery and infrastructure planning in the NPPF are as follows:

- Para. 47. Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing etc. and identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- 153. SPDs should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development;
- 156. Plan making should include strategic policies to deliver both strategic and local infrastructure;
- 157. Local Plans should plan for the infrastructure required in this area to meet NPPF objectives, preferably over a 15 year period: such requirements should be kept up to date and based on the co-operation of others including neighbouring authorities, and public, private and voluntary sector organisations;
- 157. Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map; allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- 162. Local planning authorities should work with others, including neighbouring LPAs, to assess the quality and capacity of key infrastructure (e.g. transport, water supply energy, utilities, waste, and health education) and take account of the need for strategic infrastructure;
- 173. Developments should not be unduly burdened with obligations, affordable housing requirements, infrastructure contributions etc to render them unviable;
- 177. There should be a reasonable prospect of infrastructure being delivered in a timely fashion, and for this reason infrastructure and development policies should be drawn up at the same time;
- 178, 179. As part of an approach that should see local planning authorities working collaboratively across boundaries, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans;
- 180. Local planning authorities should work collaboratively on strategic planning priorities to enable sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships; and

- 181. Local authorities are expected to demonstrate evidence of cross boundary working, and cooperation should be a continuous process resulting in plans that provide for the land and infrastructure necessary to support current and future levels of development.

Footnotes to paragraph 47 of the NPPF make clear that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

## **National Planning Practice Guidance (NPPG)**

In terms of how LPAs can show that a Local Plan is capable of being delivered, the draft NPPG (Beta Test version 28-08-13) includes the following:

- A Local Plan is an opportunity for the LPA to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when. This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded, and ensuring that the requirements of the plan as a whole will not prejudice the viability of development.
- Early discussion with infrastructure and service providers is particularly important to help understand their investment plans and critical dependencies. The LPA should also involve the Local Enterprise Partnership at an early stage in considering the strategic issues facing their area, including the prospects for investment in infrastructure.
- The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. For the later stages of the plan period less detail may be provided as the position regarding the provision of infrastructure is likely to be less certain. If it is known that a development is unlikely to come forward until after the plan period due, for example, to uncertainty over deliverability of key infrastructure, then this should be clearly stated in the draft plan.
- Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.
- The evidence which accompanies a draft Local Plan should show how the policies in the plan have been tested for their impact on the viability of development, including (where relevant) the impact which the Community Infrastructure Levy (CIL) is expected to have. Where LPAs intend to bring forward a CIL regime, there is a strong advantage in doing so in parallel with producing the Local Plan, as this allows questions about infrastructure funding and the viability of policies to be addressed in a comprehensive and coordinated way.

The draft NPPG also provides advice on the 'Assessment of land availability' and the process of identifying strategic sites.

## **The Planning Inspectorate - Examining DPDs: Learning Lessons from Experience' (September 2009)**

The Planning Inspectorate (PINS) is responsible for examining Local Plans. Whilst this note is a few years old now and the over-arching policy and guidance context has changed through the NPPF and draft NPPG, it still provides some useful information to practitioners as to how to approach plan making and some of the key issues and influences. The document includes a number of helpful lessons and references including:

- The primary development plan document (DPD) was the place to deal with the most difficult and critical issues - leaving key questions to be answered in subsequent DPDs or Supplementary Planning Documents (SPDs) was likely to lead to a finding of unsoundness.
- It may not be possible to create a "perfect" plan. A plan will not be found unsound just because uncertainty exists and is explicitly acknowledged in the DPD. The important things are for the implications of the uncertainty to be taken into account and the "what if" situation considered.
- In terms of infrastructure planning, the amount of detail that it is possible to supply is likely to be less certain and comprehensive for the later stages of the plan period.
- Inspectors will take a realistic view about what can be provided so long as the council has made reasonable attempts to engage with the infrastructure providers.
- It is essential that the key infrastructure elements on which delivery of the strategy is dependent are embedded in the plan itself
- If the intention is that the development itself will fund the infrastructure, viability evidence will be needed to show that such an approach is realistic and capable of delivering the infrastructure at an appropriate time.
- The inclusion of strategic allocations will add to the range and detail of work needed to justify the core strategy. As with infrastructure the level of detail will in practice depend on when the site is expected to come forward. For a site anticipated in the early years of the plan there is an expectation that the detailed delivery matters such as availability and infrastructure requirements will have been resolved.
- The implication of making a strategic site an 'allocation' (as opposed to a 'broad location') in a core strategy is that the development will not usually need to be addressed in a subsequent DPD. The core strategy should make clear how the development will be advanced – for example through a master plan or SPD.
- Any strategic sites that are allocated will need to be clearly defined including all the land needed to deliver that development. Therefore a core strategy that contains a strategic site or sites will, in addition to the key diagram, have to show how the proposals map will be updated if the DPD is adopted.

## **Planning Advisory Service (PAS) - 'Successful plan-making: Advice to practitioners' (July 2013)**

PAS is the Government's principal agency for supporting LPAs in plan-making and will be facilitating the proposed East Herts workshop in October.

This recent document updates its earlier advice on preparing sound plans, including tackling deliverability issues.

The advice reiterates that a plan needs to look ahead, but some degree of uncertainty will always exist. In relation to deliverability, it also references the need to have decent information on infrastructure provision for the first 5 years but for the later stages of the plan period, less detail is fine as understanding of infrastructure delivery is likely to be less certain. PAS advise that having an in principle agreement from key partners is helpful in demonstrating the issues have at least been considered.

In relation to viability, the advice references the need to engage with appropriate stakeholders is vital, and that under the NPPF, authorities need to need to test the whole plan and all its policies together to show its impact on viability. It also recommends that separate viability testing of strategic sites is also important if they are key to the delivery of the plan.

## **4. Principles for Strategic Sites**

Identified below are some key principles as to how evidence could be tailored according to when strategic sites are due to come forward. They draw on the NPPF, draft NPPG and the PINS and PAS documents referred to in Section 3 above.

### **(a) Identify the critical/essential pieces of infrastructure**

These are items which, if not delivered, would mean that development could not come forward. Is the infrastructure clear, costed, realistically timed and capable of being funded?

### **(b) Engage directly with timing issues**

In demonstrating deliverability the relationship between phasing and viability is critical. The importance of providing a significant amount of strategic infrastructure at the earliest possible opportunity must be balanced against the recognition that for developers of strategic sites, cash flow in the first five years is vital to ensuring that the whole scheme can be delivered. There are often certain items of strategic infrastructure such as roads, education and healthcare provision which are viewed as pre-requisites to development to enable the development to be accessed or serviced. In such cases it is essential to understand the costs of such provision and the impact on the phasing and viability of the scheme. It is often helpful to set out trigger points for the provision of items of infrastructure and potential embargoes to be put in place to prevent further development until certain items have been provided. An appropriate balance needs to be struck between certainty and an undesirable lack of flexibility.

### **(c) Clarify the relationship to the Infrastructure Delivery Plan & demonstrate an effective partnership approach**

The funding and implementation of the infrastructure needs are, in many cases, directly linked because the funding of an item of infrastructure might dependent on who delivers it, and vice versa. Where it is not appropriate to definitively say how this will be done, or it will be part of negotiations for a planning application, reasonable assumptions should be explicitly stated. The implications of any alternative approaches should also be considered. LPAs and infrastructure providers should as a minimum come to an Examination into a Local Plan with a statement of common ground that includes consideration of the key infrastructure issues.

### **(d) Show flexibility in aligning planning application processes with plan preparation**

In situations where an outline planning application is in the early stages of preparation a pragmatic approach can be adopted whereby evidence gathering is brought together to save time and resources. This could, for example, include capacity testing of an illustrative layout together with an enhanced understanding of the environmental, technical and planning context of the site. This need not try to answer every detailed issue normally addressed at the outline planning application stage but should be capable of addressing issues critical to the delivery of the scheme. Where viability testing indicates significant risks associated with early delivery (see viability below) of infrastructure, it will be necessary to demonstrate flexibility in the policy approach to infrastructure requirements.

There will also be circumstances where a local authority wishes to progress a site in parallel with the Local Plan. This requires continued close working between a local authority and landowner/developer on a site specific proposal (particularly during the pre-application phase). The use of a Planning Performance Agreement (PPA) can greatly assist this process..

### **(e) Consider drawing evidence together into a concise delivery plan**

In some cases it may be appropriate to draw together deliverability evidence in a concise delivery paper. A summary of the proposed infrastructure delivery along a timeline is often advisable to show the period over which an infrastructure item is delivered, starting with the planning and design, through its construction to the point at which it is available to serve the development. In some cases the preparation of a Development Framework can usefully form a part of the evidence base if pitched at the right level. This should avoid being too prescriptive or detailed but can help establish a strategic context for the allocation as well as set out the process for dealing with subsequent planning applications and design codes. It should be remembered that whilst the detail regarding planned infrastructure can be set out in supporting evidence which can be updated regularly (NPFF Para 47), the critical/essential infrastructure on which delivery is dependant need to be embedded in the Local Plan itself.

### **(f) Demonstrate contingency planning**

Effective contingency planning in the context of large scale allocations can help support the evidence base in the current economic climate. Developing a strategy for dealing with slippages and delays is recognised good practice. Questions to pose may include, for example, how would a community cope with the loss or slippage of individual phases or individual elements of critical/essential infrastructure in its early stages of delivery? How will services be provided? What tools and mechanisms are available to review and monitor the situation and how could this be managed?

### **(g) Clearly identify how, when and by whom further attention to master planning & design will follow**

The inclusion of a basic concept plan as part of a site-specific policy in a Local Plan can help provide confidence over delivery. Identifying next steps is also a key element. In the case of broad locations this may include a stated commitment to working up the detail in a Site Allocations Document or an Area Action Plan with associated timings for delivery. The general trend is towards a single unified plan so convincing justification will be needed to relegate too much detail to subsequent documents. In the case of SSAs the policy may require the working up of detail via a masterplan which in turn could be adopted as a Supplementary Planning Document. Milestones for progression of the development e.g. application submission and commencement on site, phasing and consequences ought to be outlined. In either event, clear next steps should be spelt out so that there is a shared understanding of the design and development process. This can be particularly important in situations where land ownership is fragmented and different delivery models are being deployed. Where the master planning process is already well advanced there will already be a greater understanding of the technical issues, potential mitigation measures, development costs and overall viability.

### **(h) Develop flexible site-specific policies**

Site-specific policies should be drafted with reasonable flexibility to allow for scheme development and financial viability in changing economic circumstances. Policies should not preclude development in certain parts of the site without clear reason or be overly prescriptive in terms of phasing. They should also avoid spurious accuracy when quoting figures and unnecessary detail.

## **5. Delivery Timeframe and Evidence Required**

One clear message from the general guidance outlined in Section 3 above is that the breadth and depth of evidence needed to demonstrate deliverability will vary depending on when development is expected to come forward. For delivery within the first five years of a plan, a relatively high degree of certainty is required. However, expectations are less in relation to development that is expected to come forward in the medium to longer term.

In terms of strategic sites, this raises the following issues that need to be addressed:

### **Sites being delivered in the short term (1 – 5 years)**

- Is there a high degree of certainty that detailed delivery matters such as land availability, assembly and infrastructure requirements have been resolved? If not all the answers are available what assumptions have been made about these matters?
- Does the evidence base in its entirety amount to a convincing and coherent story? Is there a need to bring together fragmented evidence into a single coherent delivery strategy or plan?
- Does the evidence base deal with the “what ifs” and demonstrate that all sensible efforts have been made to get answers?
- Does the evidence base identify and resolve the critical bits of infrastructure and are these plotted on a timeline?

### **Sites being delivered over the medium to longer term**

- Is there ‘agreement in principle’ from key agencies involved in delivery (including infrastructure provision)?
- Where the site is reliant on funding sources other than the development itself does the evidence base demonstrate the proposal is the type of scheme that is likely to attract funding and identify the likely sources?
- How effectively does the evidence base relate to the Infrastructure Delivery Plan?
- How effectively have communities, external bodies and statutory consultees been engaged? Does the evidence base demonstrate a strong public/private partnership approach with appropriate mechanisms for driving projects forward and resolving obstacles?
- Have alternative locations been thoroughly tested and is there a convincing explanation for selecting the site in question?
- Does the evidence based demonstrate that monies involved are not extraordinary given the nature of proposal?
- Where design remains at an early stage and a comprehensive master planning approach is being promoted, have the next steps been clearly identified?

## **6. Dealing with viability**

Dealing with viability, particularly in the context of early planning for complex strategic sites, can be difficult to tackle. Because of the widely different economic profiles of sites within an area there is no one size fits all approach. However, evidence is required to demonstrate a strategic site is generally viable, even in the case of broad locations, as vague statements of viability from interested parties are unlikely to carry weight. The onus to provide evidence is likely to be even more significant in situations where allocations are being carried forward from previous plans and little or no development has occurred in the intervening period.

The approach to assessing plan-wide viability is addressed in recent advice by the Local Housing Delivery Group chaired by Sir John Harman (2012) and the draft NPPG. The Local Housing Delivery Group make the point that “viability assessments of Local Plans should be seen as part of the wider collaborative approach to planning and a tool that can assist with the development of plan policies, rather than a separate exercise.” A number of case studies explored by ATLAS have identified the following issues to deliberate when tackling viability:

- Consider the scope for alignment of assessments such as CIL and Local Plan viability testing. This will help to maximise the scope for efficiency savings in procurement as well as maximising consistency in approaches and methodologies.
- Timing issues are important because the single biggest influence on viability is usually house prices. The test of viability is not that the site(s) earmarked for development need to be financially viable at the present time. It is quite reasonable to anticipate some recovery in house prices and

in market conditions generally where there is professional evidence to suggest that this might occur. In addition, consider what of the infrastructure required needs to be provided by when (i.e. inter-related phasing of all elements)?

- Ensure there is sufficient transparent evidence to allow testing. General statements from developers saying it can be funded are unlikely to carry much weight. Whilst commercial considerations may limit the extent to which sensitive data can be released there must be sufficient transparent evidence such that assumptions can be tested and to avoid the actual calculation being hidden or obscured by detail.
- Consider using a reasonable degree of scenario testing. One approach for a SSA would be to examine the viability of each core phase and, critically, the allocation as a whole against different economic scenarios. A reasonable degree of scenario testing will help demonstrate a development is viable across a range of economic scenarios and is suitable in the case of medium to longer term developments. In cases where no specific development proposals are emerging yet, the appraisals provided are likely to be based upon very broad assumptions in respect of design, layout and quantity of development. It is generally accepted that many of the assumptions will change and therefore the residual land value is likely to fluctuate, possibly to a significant degree.
- Consider using tools such as the HCA's Development Appraisal Tool to run these high level overviews of potential viability based on the residual valuation principles. This tool is widely recognised and readily available. It enables users to look at development periods which span over several years. Other tools are available and it may depend on the type of development model being deployed e.g. land trading model may demand a different approach using Internal Rate of Return (IRR). More guidance is available in the RICS guidance note Financial Viability in Planning.
- Continue to keep in mind the value at which land will typically come forward for development. As stated by the Local Housing Delivery Group report it should be noted that, on large complex sites, there are additional costs of site assembly and planning promotion that will need to be factored in. Special consideration also needs to be given to the manner in which Threshold land Value is treated (see Harman Review for further guidance p.29-31).

## **7. Lessons from Examinations**

### **Review of Examinations**

To supplement the research on examinations already undertaken by EHDC (Essential Reference Paper 'E', 20/06/13), ATLAS has identified 11 Local Plans that raise particularly relevant issues and investigated examinations specifically in relation to issues of deliverability in relation to strategic sites. The review focussed on the following issues:

- Overall approach to delivery of strategic sites (Allocations, Broad Locations, future Allocations DPD/AAP/SPD or combination);
- Evidence to support proposed transport and other infrastructure; and
- Evidence to support overall delivery/viability of proposed Allocations/Broad Locations.

The review focussed primarily on district-wide plans and sought to learn lessons on the level of evidence on the deliverability from those plans that have been found to be both sound and unsound (or where the Inspector has made clear that they have significant concerns about the effectiveness of a proposed plan). The examinations that were investigated are set out in the table below and the detailed findings are set out in Appendix 1.

It should be noted that every plan that we have looked at will have a unique context and set of influences. Each will involve a considerable evidence base and many individual stakeholders. In the time available, our approach has been to undertake an initial high level review based primarily upon



the Inspector's final reports, and therefore the findings may not be fully reflective of the full context and should not be taken as definitive or comprehensive.

<b>Development Plan</b>	<b>Decision</b>
Central Lancashire Core Strategy Central Lancashire Authorities (Preston, South Ribble and Chorley)	Sound subject to Modifications
Derriford and Seaton Area Action Plan Plymouth City Council	Plan found unsound
East Hampshire District Local Plan Joint Core Strategy East Hampshire District Council and South Downs National Park Authority	Examination suspended; further work being undertaken
Fareham Core Strategy Fareham Borough Council	Sound subject to Modifications
Halton Core Strategy Halton Borough Council	Sound subject to Modifications
Melton Borough Core Strategy Melton Borough Council	Plan withdrawn following Inspector recommendations
Milton Keynes Core Strategy Milton Keynes Council	Sound subject to Modifications
Newark and Sherwood Core Strategy Newark and Sherwood District Council	Sound subject to Modifications
Tamworth Local Plan Tamworth Borough Council	Plan withdrawn following Inspector recommendations
Taunton Deane Core Strategy Taunton Borough Council	Sound subject to Modifications
Winchester District Core Strategy Winchester City Council and South Downs National Park Authority	Sound subject to Modifications

## Key Lessons for Strategic Sites

### Broad Locations/Allocations/SPDs

- Need for sufficient housing sites to be allocated in Plans themselves, rather than the promotion of sites identified in the SHLAA by way of SPDs (which is uncertain/risky) (Tamworth).
- It is not essential that all necessary transport infrastructure is identified before designating a Broad Location, providing that the highway authorities (County and Highways Agency) do not object in principle and that there is a commitment to continue to liaise with all relevant parties in a collaborative way. A process for identifying additional supporting infrastructure (e.g. Highways and Transport Masterplan feeding in to an Allocations DPD) helps provide confidence, but is not essential (Central Lancashire Authorities).
- Allocations need to establish key principles (including constraints, land uses and scale, necessary infrastructure, thresholds for the delivery of infrastructure, funding, delivery and milestones) and masterplans can help achieve this (Tamworth).

- A Core Strategy, which does not in itself allocate sites, needs to commit to the preparation of the early production of a subsequent development plan that allocates sites within identified Broad Locations in order demonstrate that there is realistic prospect of development taking place (Taunton Deane and Central Lancashire Authorities).
- A 'Strategic Sites and Locations Assessment' (or similar) can helpfully set out the reasoning behind the selection of proposed sites/locations as well as the reasons why other sites/locations have not been favoured (Central Lancashire Authorities).
- Need for allocations to be realistically deliverable (not aspirational) – the existence of an undetermined planning application does not negate the need for evidence on deliverability (Plymouth).

#### Overall evidence

- Evidence needs to be transparent and available for scrutiny for it to be given weight (Fareham).
- Proposed Allocations need to be based on a thorough understanding of evidence in in the SHMA, SHLAA and an assessment of the effectiveness of carrying forward previously allocated sites (which have not delivered despite allocation) (Tamworth).
- Need for up-to-date evidence relating to the objectively assessed housing requirement (East Hampshire).
- Importance of sufficient information to demonstrate likely financial viability (Melton and Tamworth).
- Importance of up-to-date evidence on demand (Plymouth).
- Importance of evidence to support infrastructure needed to support development expected to come forward in the next five years (Plymouth).

#### Engagement

- Need to demonstrate adequate engagement with infrastructure providers over infrastructure requirements and for these to be reflected in the plan/IDP (Melton and Police).
- Demonstrating an approach to project governance, involving all the key parties, is helpful to give confidence that issues can be addressed collaboratively (Fareham).

#### Promoters/developer evidence

- Evidence of consultation with landowners and prospective developers is important (Milton Keynes).
- Comprehensive evidence from promoters/landowners is important in building confidence and addressing uncertainty, with Statements of Common Ground between LPAs and promoters (East Hampshire and Taunton Deane).

#### Duty to co-operate

- Importance of duty-to-co-operate issues for those SSAs/Broad Locations that are close to District boundaries (East Hampshire).
- If relying on the delivery of additional housing in a neighbouring authority to help meet the objectively assessed housing requirement, such housing should be physically related to the District and there needs to be sufficient evidence to demonstrate likely delivery (including mitigation of likely impacts on the host and exporting authorities, infrastructure requirements and financial viability) (Tamworth).

#### Uncertainty

- Whilst the Core Strategy was the place to make the key in principle decisions, future planning stages could confirm details and resolve matters that may be outstanding (Fareham).
- Uncertainty in terms of specific infrastructure works or their funding is not fatal; as long as a reasonable level of work has been done to show that there are options to address issues, and the key relevant stakeholders have not objected or identified (with evidence) potential show stoppers (Fareham, Taunton Deane and Winchester).

- Evidence of past delivery by LPAs of housing and associated infrastructure helps provide confidence that sites are likely to be delivered in the future (Milton Keynes and Central Lancashire Authorities).
- Detailed traffic effects and associated mitigation are matters that are capable of being left to be determined by Transport Assessments associated with specific proposals (Newark and Sherwood).
- Importance of contingency planning. Monitoring is not enough – need to outline how and what actions would be undertaken to keep the plan on track (Plymouth).

#### Wider contribution/benefits

- Infrastructure required to support new development at SSAs may also be required to support new development elsewhere (Halton).
- Opportunity to improve facilities/services for existing residents as well as provide for future residents is a relevant consideration (Newark and Sherwood).

#### Masterplans

- Indicative masterplans are helpful in building confidence over deliverability (Taunton Deane).
- The inclusion in the Plan of illustrative ‘masterplans’ (in this case basic development frameworks/organising diagrams) help provide confidence over delivery (Newark and Sherwood).

#### Policy Wording

- Policy wording should be suitably flexible so as not to unnecessarily preclude development in certain areas or to be too prescriptive in terms of the phasing of development (Newark and Sherwood)
- Policy wording should be suitably flexible to take account of economic viability (Milton Keynes).
- Assumptions on build-out rates and what amount of housing and commercial floorspace could be delivered over a plan period need to be realistic, reasonable and deliverable (East Hampshire and Plymouth)<sup>1</sup>.
- Allocations’ policies should be drafted with reasonable flexibility to allow for scheme development and financial viability in changing economic circumstances, avoid spurious accuracy when quoting figures and avoid unnecessary detail (Winchester).

#### Other

- Need to fully understand mineral extraction/land reclamation issues, where relevant, (including timetable, costs, impact on masterplan and impact on investor confidence) (East Hampshire).

## **8. Conclusions and Way Forward**

These conclusions and possible ways forward draw on the findings of the earlier sections of this note. They also take account of the discussions that ATLAS has had with a number of the promoters/potential developers and officers from Hertfordshire and Essex County Councils (with respect to school provision and transport).

Officers and Members may wish to reflect on the advice given above in Sections 4 to 7 (Principles for Strategic Sites, Delivery Timeframe and Evidence Required, Dealing with Viability and Lessons from Examinations ) and use it to help develop the Plan’s place-specific policies (including the overarching development strategy, infrastructure policies and site allocations/broad locations).

Whilst fully in accordance with the NPPF and draft NPPG, the District Planning Executive Panel’s decision to prepare a single District Plan to cover scale, disposition and principles underpinning new development across the District up to 2031 and site allocations does increase the importance and urgency of addressing deliverability issues. This raises three key issues in relation to strategic sites, namely:

---

<sup>1</sup> Please see ATLAS notes on build-out rates from Strategic Sites (July 2013)

- Engagement with promoters/prospective developers;
- Identification of specific infrastructure requirements that are necessary to deliver development on allocated sites (and a fairly good idea in relation to any broad locations); and
- Duty-to-co-operate issues.

Given this, EHDC should consider taking the following actions:

(a) Engagement with Promoters/prospective developers

Establish and implement a strategy for fully engaging with the promoters/ prospective developers of identified strategic sites, and explain to the site selection rationale to those that are behind any sites that the draft Plan's spatial strategy does not propose to bring forward over the plan period.

For those strategic sites that the Council does propose to identify, it should consider preparing a template for the issues that it wants to be satisfied on, the evidence that it considers necessary to demonstrate deliverability on these issues and a clear timetable and route map for joint working up to the submission of a District Plan and its examination. These could help address the need for collaborative working and address the various issues identified in Section 7 (Lessons from Examinations), including the importance of sufficient information to demonstrate financial viability, the value of agreeing Statements of Common Ground, the usefulness of indicative masterplans and the particular need to organise and present evidence in relation to traffic and highways and school places issues.

(b) Infrastructure

As part of preparing an Infrastructure Topic Paper and Infrastructure Delivery Plan, in order to help reduce uncertainty and manage risk, EHDC may wish to ensure that the Delivery Plan sets out a narrative (with diagrams) explaining the process for identifying and delivering infrastructure. This includes outlining proposed procedures for the Council itself (which could include identification of an Infrastructure Manager responsible for co-ordinating issues, corporate structures and decision making etc.) and relationships with external partners and alignment with site-specific financial viability assessments.

(c) Duty to Co-operate

The Council will need to pay particular attention to this duty when considering potential allocations that are adjacent to or (subject to parallel allocations by neighbouring authorities) straddle administrative boundaries. This includes East Welwyn Garden City (Welwyn Hatfield), Bishop's Stortford, Sawbridgeworth and North of Harlow ( Uttlesford and Harlow). Issues to be addressed include:

- The need for a vision for the proposed Sustainable Urban Extension/ new settlements as a whole, irrespective of administrative boundaries;
- A clear understanding of the number of homes that would be delivered in East Herts and the number of homes (if any) that would be delivered in the adjoining District;
- Agreement with the neighbouring authority on how the proposed homes in East Herts and any homes in its area would help meet the respective objectively assessed housing requirements for each authority; and
- Clarity on what infrastructure is needed to support additional housing in East Herts, including that which would be located in an adjoining District and the delivery of any necessary mitigation.

## Appendix 1: Detailed Findings of Review

<p><b>Local Planning Authority:</b> Central Lancashire Authorities (Preston City Council and South Ribble and Chorley Borough Councils)</p>	<p><b>Name of Inspector:</b> Richard E Hollox</p>
<p><b>Development Plan:</b> Draft Central Lancashire Core Strategy</p>	<p><b>Decision:</b> Sound, subject to additional modifications. Inspector's Report 07-06-12</p>
<p><b>Background</b> Hearings in June and July 2011 and March 2012 – substantially before the repeal of the North West of England Plan, the publication of the NPPF or the 'duty to co-operate.</p> <p><b>Overall Approach</b> Concentrate growth in the Preston/South Ribble Urban Area, focussing on regeneration opportunities in:</p> <p>3 x Strategic Locations (as broad locations where precise boundaries have not yet been defined, but which are central to the achievement of the Core Strategy)</p> <ul style="list-style-type: none"> <li>• Central Preston Strategic Location (including City Centre, Inner East Preston, Thithebarn Regeneration Area and the new Central Business District)</li> <li>• North West Preston (including Higher Bartie and Broughton/Land at Eastway <i>(addition)</i>)</li> <li>• South of Penwortham and North of Farington <i>(addition)</i></li> </ul> <p>4 x Strategic Sites (allocated in the plan) at Buckshaw Village; Cuerden; BAE Systems, Samlesbury; and Cottam <i>(previously a Strategic Location)</i>.</p> <p>Subsequent separate Site Allocations DPD or individual AAPs would follow to allocate further sites and establish implementation proposals for the strategic locations.</p> <p><b>Key Relevant Issues</b></p> <p><u>1. Effectiveness of the vision and proposals for growth (including proposed Strategic Locations and Sites)</u></p> <ul style="list-style-type: none"> <li>• The above 'overall approach' includes a number of changes proposed by the Councils at Examination stage and supported by the Inspector's proposed modifications. This included: <ul style="list-style-type: none"> <li>○ Making Cottam an allocated Strategic Site rather than a Strategic Location (existing allocation, partly developed, resolution to grant permission on part and another part subject to an outline application). The Inspector agreed referring to the sites combined size, substantial contribution to housing requirement and advanced nature of proposals;</li> <li>○ Identifying two additional Strategic Locations. The Inspector referred to their proximity to the main built-up area and consequential access to services, particularly public transport and the potential for their improvement to wider benefit. These were supported by the majority of house builders at the Hearings and the Inspector noted that this "bodes well for deliverability."</li> </ul> </li> <li>• The Inspector notes that the Council's evidence on infrastructure requirements has been thoroughly assessed and not seriously challenged – with the County and Highways Agency (HA) supporting the proposals in principle (on the proviso that they will necessitate major additions to transport infrastructure). This was in the face of some quite serious reservations by the County and HA. The Inspector supported the County's proposal to add supporting text making it clear that a Highways and Transport Master Plan was a prerequisite to informing the production of detailed proposals for supporting infrastructure, to be set out in the proposed Site Allocations DPD, but did not consider that this was essential.</li> <li>• The Inspector referred to examples of where permissions for new housing had secured financial contributions towards improvements to a motorway junction referring to "the track record so far is good" and "these examples install confidence that the Councils will secure reasonable contributions..."</li> <li>• When discussing locations of growth in other places, the Inspector refers to the strength of a</li> </ul>	

Strategic Sites and Locations Assessment which sets out the reasoning behind their selection as well as the reasons why other sites/locations have not been favoured (including descriptions and a comprehensive criteria-based analysis).

- Support for proposed modifications that explain monitoring and contingency arrangements should housing delivery fall below 80% of the housing requirements over a 3 year rolling average (e.g. phasing policies could be changed in the proposed Site Allocations DPD to help bring forward uncommitted development, closer management of delivery with partners and bringing forward additional/alternative sites for housing).

#### 2. Delivery and monitoring

- The Inspector commends the Infrastructure Delivery Schedule (IDS) as a 'living document' that accepts the need for consultation, monitoring and updating and for being realistic in its acceptance of uncertainty. The report uses examples that give weight to the Councils' commitment and progress to date and accepts that the "inevitability of changes in financial circumstances" on various projects. The Inspector also stresses the importance of the proposed monitoring framework.

#### 3. Effectiveness in meeting local housing needs

- There were calls for certain land in the proposed two additional Strategic Locations that benefitted from planning permission or a great deal of preparatory work to be classified as Strategic Sites. The Inspector concluded that this would be premature given the proposal to prepare a Sites Allocations DPD and that there is nothing in principle to prevent a planning application being made for land within a Strategic Location. "The balance of advantage is with the identification of Strategic Locations as a precursor to the judicious definition of actual sites."

#### 4. Effectiveness in meeting special housing needs, including affordable housing

- The Inspector supports proposed modifications to the affordable housing policy to make clear that it is sought, not required, and that it is a platform for negotiations over viability and tenure split etc.

#### **Lessons:**

- It is not essential that all necessary transport infrastructure is identified before designating a Broad Location, providing that the highway authorities (County and Highways Agency) do not object in principle and that there is a commitment to continue to liaise with all relevant parties in a collaborative way. A process for identifying additional supporting infrastructure (e.g. Highways and Transport Masterplan feeding in to an Allocations DPD) helps provide confidence, but is not essential.
- Evidence of past delivery by LPAs of housing and associated infrastructure helps provide confidence that sites are likely to be delivered in the future.
- A 'Strategic Sites and Locations Assessment' (or similar) can helpfully set out the reasoning behind the selection of proposed sites/locations as well as the reasons why other sites/locations have not been favoured.
- Need process for identification of actual sites within an identified Broad Location via a subsequent DPD or AAP.

<b>Local Planning Authority:</b> Plymouth City Council	<b>Name of Inspector:</b> Andrew Seaman
<b>Development Plan:</b> Draft Derriford and Seaton Area Action Plan 2006-2021	<b>Decision:</b> The Plan does not provide an appropriate basis for the planning of the Area and is consequently not sound. (23-08-13)
<p><b>Background</b>  The Plan was examined in March 2013, prior to the revocation of the Regional Spatial Strategy for the South West.</p> <p><b>Overall Approach</b>  Area Vision Statement in Core Strategy established a vision for the area. The Core Strategy committed the Council to preparing an AAP to deliver this vision. The AAP sets out an approach (including Design Codes, Public Realm Strategy, a Delivery Plan and Consultation Strategy) to deliver approx. 2,950 homes, new commercial, retail and education facilities.</p> <p><b>Inspector's Key Concerns on deliverability</b></p> <p><u>Deliverability of sites</u>  The Plan is not supported by adequate evidence that demonstrates the timely deliverability of key sites across the Plan period. The report goes through a number of employment and mixed-use sites including the following:</p> <p><i>Policy DS06 - Plymouth International Medical Technology Park (PIMTP) (40,000sqm)</i></p> <ul style="list-style-type: none"> <li>• Insufficient clarity as to how much of the PIMTP site may be acceptably brought forward, due to limitations with the existing transport infrastructure ahead of the Forder Valley Link Road (FVLR) which is not scheduled for effective completion until 2020.</li> <li>• Viability evidence shows that speculative office development is not currently commercially viable.</li> </ul> <p><i>Policy DS07 - Tamar Science Park (20,000sqm)</i></p> <ul style="list-style-type: none"> <li>• Evidence prepared in 2009 in more buoyant economic circumstances. Little up to date evidence to suggest that this is deliverable in the short term (what there is suggests not).</li> </ul> <p><i>Policy DS13 – Seaton Neighbourhood (Approx. 770 homes, 4,500sqm local centre)</i></p> <ul style="list-style-type: none"> <li>• Lack of clarity on how development would be phased and when the FVLR will be required to enable completion of the entire proposal (Proposal refers to only a small % of homes being permissible ahead of the FVLR). Imprecision undermines the likely effectiveness (notwithstanding that there is a current planning application).</li> </ul> <p><i>Policy DS16 - District Centre (approx.8,000sqm)</i></p> <ul style="list-style-type: none"> <li>• Not convinced of the need for a centre and how this would strengthen the role of the PIMTP as a strategic employment site. The loss of this employment land in advance of an update to the city-wide economic evidence base (currently under way) would not be justified.</li> </ul> <p>Policy DS08 – Crownhill Retail Park (approx. 80 homes and 2,000sqm offices)</p> <ul style="list-style-type: none"> <li>• Again little evidence that this would be deliverable.</li> </ul> <p>Policy DS12 – Glacis Park (15,000sqm offices and 700 homes)</p> <ul style="list-style-type: none"> <li>• Viability evidence does not support the deliverability of the proposed office content.</li> </ul> <p><i>Overall</i>  Viability and sensitivity testing highlights the challenges faced by office development. The strategy appears aspirational rather than realistically deliverable.</p> <p><u>Uncertainty that necessary modal shift could be delivered</u>  The Plan is not supported by evidence to indicate that the timely modal shift necessary to ensure transport infrastructure will be able to accommodate the development proposed within the area can be secured. Key issues include:</p>	

- A386 close to capacity at peak times;
- Transport modelling shows the limitations of the existing transport infrastructure in accommodating the proposed levels of development, even if subject to capacity improvements. A transformation in travel behaviour is needed (reducing predicted number of car trips from new development by a “very challenging” 50%);
- Highway Agency highlighted doubts that infrastructure proposals would achieve the required modal split; and
- Changing Travel Behaviour (Policy DS17) is in part dependent on the delivery of a range of infrastructure improvements (Policies DS18 and DS19) – which would be delivered over time, so any modal shift would be gradual.

#### Uncertainty about transport infrastructure

The Plan is not supported by evidence that the transport infrastructure shown within the Plan is deliverable in a “timely fashion”.

Policies DS18 and DS19 outline proposals for 2 x new link roads (FVLR and Marjon Link Road) and improvements to existing highways (junctions, bus lanes, bus stops etc.). Concerns:

- Associated Delivery Framework shows that some key elements would not be delivered until 2020 or 2026;
- Costs of FVLR have risen and it has slipped down the Council’s priorities (partly due to delay in delivery of development);
- Uncertainty as to how the FVLR will complement/serve the anticipated total levels of development proposed at the Seaton Neighbourhood, PIMTP and Seaton Barracks. Lack of “reasonable prospect” of delivery;;
- Funding arrangements unclear (£25m+) – background paper highlighting possible funding sources and previous success at securing funding is not sufficient.
- Assumptions about locally generated funding (s.106, CIL and New Homes Bonus, possible TIF) not convincing, given viability concerns about development and that it is unlikely to come on stream to fund infrastructure at the time it is needed. “Reasonable doubt” as to funding and lack of robust contingency planning (monitoring is not enough – needs to lead to actions that would secure the effective and timely delivery of the Plan).

#### **Lessons:**

- Importance of evidence to support infrastructure needed to support development expected to come forward in the next five years
- Build-out rates need to be reasonable and deliverable – taking account of viability.
- Importance of up-to-date evidence on demand
- Need for allocations to be realistically deliverable (not aspirational) – the existence of an undetermined planning application does not negate the need for evidence on deliverability.
- Importance of contingency planning. Monitoring is not enough – need to outline how and what actions would be undertaken to keep the plan on track.



<b>Local Planning Authority:</b> East Hampshire District Council (EHDC) and South Downs National Park Authority (SDNPA)	<b>Name of Inspector:</b> Anthony Thickett
<b>Development Plan:</b> East Hampshire District Local Plan Joint Core Strategy	<b>Decision:</b> Significant concerns, further work required to before the plan could be found sound. Inspector's Letter 23-11-12
<p><b>Background</b></p> <p>The Plan was examined in October and November 2012. This was before the revocation of the SE Plan.</p> <p>The Inspector's letter following the Hearings set out a number of concerns and recommended that (amongst other things) the Authorities:</p> <ul style="list-style-type: none"> <li>• Produce an up to date SHMA to assess the need for housing and affordable housing</li> <li>• Subject to the results of that exercise, consider making provision for an increased number of dwellings and/or set out results of discussions with neighbouring authorities in relation to meeting any un met need in the District</li> <li>• Define the extent to which Whitehill and Bordon is expected to meet need that would not be met in the rest of the District (see discussion below re: Waverley)</li> <li>• Explore the implications of pre extraction on the timetable for the delivery of housing at Whitehill and Bordon. If pre extraction would introduce significant delays in the delivery of new housing at Whitehill and Bordon, assess the impact on the District's 5 year supply of housing and consider whether any immediate shortfall should be met elsewhere (see discussion below)</li> <li>• Produce an updated viability study in relation to affordable housing which takes into account requirements set out by policies in the JCS that may have an impact on viability</li> </ul> <p>The Examination was suspended for 9 months to allow for the above. Further Modifications have been published and the Hearings are set to begin again at the end of October 2013.</p> <p><b>Overall Approach</b></p> <ul style="list-style-type: none"> <li>• Strategic Allocation of Whitehill and Bordon (4,000 homes and 5,500 jobs) – specific policy with proposed land-use budget and references to masterplan, a specific transport strategy and specific infrastructure requirements)</li> <li>• Central Hampshire to accommodate 4,400 homes and South Hampshire to accommodate 1,320 homes – some site referred to, but not allocated, with reference to other sites being identified through a separate Development Allocations DPD or Neighbourhood Plans</li> </ul> <p><b>Whitehill Bordon Strategic Allocation</b></p> <p><u>Key evidence on delivery:</u></p> <ul style="list-style-type: none"> <li>• Interim Statement and Infrastructure Schedule (CD11/E13) - sets out specific infrastructure requirements for Whitehill Bordon (total cost estimated as approx. £215m).</li> <li>• Viability Assessment of Whitehill and Bordon Eco-town Masterplan (CD11/WBV02) – based on a set of key assumptions and sensitivity testing.</li> <li>• A comprehensive Statement of Common Ground between EHDC/SDNP and Whitehill &amp; Bordon Eco-Town Landowners' Group (CD12/SOCG5) addresses the following:             <ul style="list-style-type: none"> <li>○ Memorandum of Understanding between landowners</li> <li>○ Existence of a Delivery Board</li> <li>○ Existence of an overall Eco-town masterplan</li> <li>○ Commitment to submit an outline application</li> <li>○ Representations made, issues agreed and proposed modifications</li> <li>○ Areas of LoG support for the plan (including that LoG would not be solely responsible for/pay for the delivery of the entire town and that some form of public sector investment of funding is needed to facilitate delivery of the project – particularly in terms of necessary early infrastructure).</li> <li>○ Agreed approach to addressing viability and delivery issues.</li> </ul> </li> </ul> <p>EHDC revised its housing trajectory for the proposed new 'Eco-town', with a more conservative</p>	

estimate of 2,725 homes being built over the plan period (up to 2028) (with a peak of 270 homes per year) (EHSD024).

#### Key Inspector Decisions

- The four year old SHMA was out of date and needed updating.
- The more recent Local Housing Requirements Study includes figures that do not include any unmet requirements from neighbouring authorities, although Waverly Borough Council had explored whether its unmet need could be accommodated at Whitehill Bordon.
- Not convinced by a Statement of Duty to Co-operate (CD4/30) that acknowledged that the allocation may accommodate people who live or would desire to live in Waverley, but that it “would currently be unreasonable to formally state this.” The Inspector considered that it may be acknowledged in the future that Whitehill and Bordon would provide houses to satisfy unmet need in Waverley.
- A significant part of the Whitehill Bordon allocation site lies on top of soft sand and Policy MWP of the proposed plan safeguards this resource. The Inspector considered that extraction would not be a simple matter and that it would inevitably delay the provision of some of the housing (and the new town centre). He was also concerned that the requirement for prior extraction would be likely to have an impact on how attractive the town is to private investors. He was not satisfied that a hybrid outline/full application in 2013 would allow prior extraction to be investigated. He thought that it needed to be investigated at the plan stage.

#### **Lessons:**

- Need for up-to-date evidence relating to the objectively assessed housing requirement.
- Assumptions on build-out rates and what amount of housing could be delivered over a plan period need to be realistic
- Importance of duty-to-co-operate issues for those SSAs/Broad Locations that are close to District boundaries
- Comprehensive evidence from promoters/landowners is important in building confidence and addressing uncertainty.
- Need to fully understand mineral extraction/land reclamation issues, where relevant, (including timetable, costs, impact on masterplan and impact on investor confidence)

<b>Local Planning Authority:</b> Fareham Borough Council	<b>Name of Inspector:</b> Michael J Hetherington
<b>Development Plan:</b> Draft Fareham LDF Core Strategy	<b>Decision:</b> Sound, subject to additional modifications. Inspector's Report dated 20-07-11

### Background

The Plan was examined in May 2011, prior to the revocation of the South East Plan, the publication of the NPPF and the Duty to Cooperate.

### Overall Approach

- The plan included four strategic sites, two coming forward as strategic allocations (to be followed by subsequent SPDs) and two as strategic locations (to be followed by AAPs)
- The most significant and challenging component of the plan was a strategic location for the North of Fareham Strategic Development Area (SDA) comprising of 6,500-7,500 residential units, employment, community facilities and associated infrastructure.
- The approach to the SDA was to establish a site specific policy for the location including general quantum of development together with development principles, and a commitment to prepare a site specific AAP to confirm the boundary, formally allocate the site and resolve outstanding matters (including detailed infrastructure requirements)
- The underpinning rationale for the SDA primarily related to strategic growth needs, derived and agreed through regional and sub-regional planning processes.

### Evidence & consideration of the North of Fareham Strategic Development Area as to whether it was realistic, deliverable, adequately justified, consistent with sub-regional policy and in general conformity with the Regional Strategy

- The Inspector recognised the significance of the SDA to the overall plan and focussed attention on the Council's approach and level of evidence that had been prepared to justify it.
- The Council had undertaken a range of detailed studies, supplemented by work done by the promoters and therefore a considerable amount of information was available to consider core deliverability considerations including detail on site constraints, capacity, viability and the position of landowners.
- The Inspector initially focussed on conformity, given that the South East Plan had originally considered the site could provide up to 10,000 homes and related employment space. The Inspector was satisfied that there was sufficient justification for the minimum 6,500 homes in light of evidence on constraints and capacity. As there were still a number of factors that could influence overall numbers, defining a range was considered an appropriate approach.
- The site was being promoted by several separate landowners who prepared other evidence for use as part of the examination process. The most significant was the preparation of a strategic masterplan by the promoters, which illustrated a number of potential options as to how the site could come forward in light of site constraints and different access approaches. The intention was to take forward master planning as part of the subsequent AAP process.
- The Council had prepared a 'Project Plan' as part of its evidence base to set out the approach to governance, decision making and joint working across a range of technical themes. This provided evidence that a structured and collaborative structure was being followed to take the site forward, including an overall Project Board, led by the Council but with wider public and private sector representation (including the landowners).
- Transport infrastructure was a particular issue, as the site sits adjacent to the M27. At the time of the Examination there was not an agreed or preferred access solution, as alternative motorway junctions could be used, which in turn would influence whether additional strategic highway connections might need to be put in place. Transport modelling work had not been completed.
- Despite this, the Inspector considered that a significant amount of work had been undertaken to explore the SDA's transport implications including considering different options for site access and evolving an agreed strategy and approach to work through issues between the site promoters, Highways Authority and Highways Agency.
- Of particular significance was that the key stakeholders had not challenged the soundness of the

proposal at this stage despite the transport uncertainty, and that in the absence of any substantive evidence to the contrary, the Inspector had no reason to disagree with the position of the transport bodies concerned.

- In light of highway solutions not yet being fixed and related implications on layout/uses on the site, the Inspector did require modifications to the plan's text and key diagram to retain flexibility subject to the outcomes of subsequent work as part of the AAP.
- The proposed level of housing relied upon some green infrastructure being located in neighbouring Winchester City Council (WCC). WCC were concerned about any built development or formal open space uses within its boundary, but that other forms of green infrastructure would be acceptable in principle. WCC were represented on the Project Board and hence would play a role in future planning for the site. The Inspector concluded on this point that this did not pose a significant barrier to effective delivery, and that the governance structure was a particularly useful aspect of building confidence.
- The Council had undertaken a high level viability study relating specifically to the SDA. This drew together cost information from the promoters with market information on values. This concluded that there was a reasonable prospect that the scheme would be viable, subject to improvements in market conditions, the scale of development that came forward, and scope of partnership approach to delivery. However, the Inspector stated that he was only able to place limited weight on the Council's viability work as key assumptions and related financial figures had not been made public within the report and hence could not be scrutinised.
- The Council had also acknowledged that whilst the viability study was indicating a positive outcome, there would still be issues in terms of upfront funding, cash flow and the role of potential wider funding sources. The Council prepared studies to consider possible funding options including concepts related to pooling S106 obligations, future CIL receipts, and possible additional mechanisms such as Tax Increment Financing. The work established that there were various options and a willingness from the Council to act proactively going forward.
- In conclusion, the Inspector recognised that whilst there were a range of concerns, many of these were detailed matters that could be more appropriately considered in the context of the AAP. He also acknowledged that other relevant authorities were not identifying any 'show stoppers' sufficient to undermine the principle of the proposal.

#### **Lessons**

- Uncertainty in terms of specific infrastructure works or their funding is not fatal; as long as a reasonable level of work has been done to show that there are options to address issues, and the key relevant stakeholders have not objected or identified (with evidence) potential show stoppers.
- Whilst the Core Strategy was the place to make the key in principle decisions, future planning stages could confirm details and resolve matters that may be outstanding.
- Evidence needs to be transparent and available for scrutiny for it to be given weight
- Demonstrating an approach to project governance, involving all the key parties, is helpful to give confidence that issues can be addressed collaboratively

<b>Local Planning Authority:</b> Halton Borough Council	<b>Name of Inspector:</b> Robert Yuille
<b>Development Plan:</b> Draft Halton Core Strategy Local Plan	<b>Decision:</b> Sound, subject to additional modifications. Inspector's Report 12-10-12
<p><b>Overall Approach</b></p> <ul style="list-style-type: none"> <li>• 4 key Areas of Change</li> <li>• Some but not all sites formally allocated as Strategic Sites (Broad identification of infrastructure requirements)</li> <li>• Commitment to prepare future Site Allocation and Development Management DPD</li> <li>• Commitment to update existing SPD for some sites</li> </ul> <p><b>Issue 5 – Development in the plan period will be focused on four Key Areas of Change at 3MG, South Widnes, West Runcorn and East Runcorn. Is the selection of these areas justified and are they deliverable?</b></p> <p><u>3MG, South Widnes, West Runcorn</u></p> <ul style="list-style-type: none"> <li>• No insurmountable flooding problems – their selection or ability to deliver has not been seriously challenged.</li> </ul> <p><u>East Runcorn</u></p> <ul style="list-style-type: none"> <li>• Question about deliverability of employment areas at Daresbury Park and Daresbury Science and Innovation Campus – Modifications required (relatively minor text changes relating to land around a proposed vehicular route).</li> <li>• A bigger concern related to necessary junction improvements to Junction 11 on the M56. A complex series of improvements are secured by planning obligations. However, these do not trigger payments until schemes to which they reach a certain threshold. The problem is they are needed to accommodate other development (AS7), meaning that the deliverability of other development is dependent on thresholds being reached/financial contributions being made. Recommended modifications include making clear that alternative methods of funding that would enable the necessary improvements to be carried out ASAP are to be explored.</li> </ul>	
<p><b>Lessons</b></p> <ul style="list-style-type: none"> <li>• Infrastructure required to support new development at SSAs may also be required to support new development elsewhere.</li> </ul>	

<b>Local Planning Authority:</b> Melton Borough Council	<b>Name of Inspector:</b> Harold Stephens
<b>Development Plan:</b> Draft Melton LDF Core Strategy	<b>Decision:</b> Plan withdrawn following the Inspector's preliminary conclusion that it was not sound. 19-04-13
<p><b>Overall Approach</b></p> <ul style="list-style-type: none"> <li>• SUE to Melton Mowbray (1,000 homes up to 2026) (reference made to preparing an AAP for the SUE) (specific infrastructure identified in policy)</li> <li>• Other housing sites in Rural Centres and Sustainable Villages to be allocated in a future Land Allocations and Settlement Boundaries DPD</li> </ul> <p><b>Examination</b></p> <p>An EiP into the published Core Strategy began in February 2013. Following sessions on spatial strategy and housing, the Inspector wrote to the Council in early April 2013 making clear that he thought that there were matters of fundamental concern which could not be overcome through changes/modifications. The concerns were as follows:</p> <ul style="list-style-type: none"> <li>• The Plan was not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;</li> <li>• Inadequate plan period of 13 years at most;</li> <li>• Inadequate evidence to substantiate the apportionment of 80% of total development to Melton Mowbray and 20% to Rural Centres and Sustainable Villages;</li> <li>• The proposed SUE to the north of Melton Mowbray would have an unacceptable impact on landscape, agricultural land and biodiversity (reasonable alternatives, including a western growth option, were not fully considered) and would not be deliverable</li> <li>• Concerns about Sustainability Appraisal and process.</li> </ul> <p>In the face of such fundamental concerns, the Council withdrew the Plan.</p> <p><b>Deliverability Issues</b></p> <p>The Plan was withdrawn before the EiP could consider all of the delivery matters in detail. Furthermore, the Inspector's letter does not refer to specific pieces of evidence that he found unsatisfactory. However, discussion under the headings below attempts to unpick the Inspector's concerns. It should be noted that Melton Mowbray Town Estates (part of the Pegasus Group) made representations promoting an alternative Southern SUE.</p> <p><u>Timescale and viability</u></p> <ul style="list-style-type: none"> <li>• The timescale for the delivery of the northern SUE is unrealistic and the proposal has not proven to be viable (para 173 of NPPF). There is no detailed analysis of viability (including the provision of infrastructure, s.106 requirements and normal site development costs).</li> <li>• The Council had commissioned Halcrow to prepare a concept strategic masterplan and phasing plan (the Preferred Option Report). This proposes 280 homes in Phase 1 (2013-17), 400 homes in Phase 2 (2017-21) and 320 homes in Phase 3 (2021-26). No apparent evidence base on housing delivery – reliance on brief assertions in Halcrow document. Landowners/ developers did attend the Hearing, but there was no discussion of housing delivery.</li> <li>• The only viability evidence appears to be a high level report into all growth options (not specifically a Northern SUE) prepared by Savills in 2009. The Council did submit an Alternative Sources of Funding Note (EX19) which discusses options, s.106, CIL and various Government pots. The Inspector clearly considered these reports to be insufficient.</li> </ul> <p><u>Inadequate requirements in Infrastructure Delivery Plan</u></p> <ul style="list-style-type: none"> <li>• The requirements in the IDP are not adequate to meet the Police's infrastructure requirements in conflict with para 182 of NPPF.</li> <li>• The Leicestershire Constabulary made representations and appeared at the Hearing in to the proposed Northern SUE. It claimed lack of effective engagement and the inadequacy of apportionment of infrastructure costs of £230,000 (Infrastructure Schedule Update, SD10a), when the figure was more like £408,000.</li> </ul>	

- The infrastructure costs attributed to the Northern SUE as a whole were £19.08m (including £13m for link road and Spinney Road upgrade).

#### Transport

- Traffic studies suggest that a southern bypass to support a southern SUE would provide similar traffic mitigation benefits to the town and would be equally deliverable. Furthermore, a southern SUE bypass would avoid potential environmental impacts and would be cheaper.

#### **Lessons:**

- Importance of sufficient information to demonstrate likely financial viability.
- Need to demonstrate adequate engagement with infrastructure providers over infrastructure requirements and for these to be reflected in the plan/IDP.

<b>Local Planning Authority:</b> Milton Keynes Council	<b>Name of Inspector:</b> Mary Travers
<b>Development Plan:</b> Draft Core Strategy	<b>Decision:</b> Sound, subject to additional modifications. Inspector's Report 29-05-13
<p><b>Overall Approach</b>  2010 to 2026 target = 28,000 homes  2010 to 2016 = 10,500</p> <ul style="list-style-type: none"> <li>• 4,177 already built (2010-2013)</li> <li>• 19,759 on existing sites (existing Allocations/sites with planning permission)</li> <li>• 2,900 from new Strategic Land Allocation to south east of City (to be supported by an SPD)</li> <li>• 1,760 in sustainable settlement in rural area – with a future Site Allocations Plan to identify 600 homes</li> </ul> <p><b>Housing Delivery:</b></p> <ul style="list-style-type: none"> <li>• Some discussion about proposed delivery rates in relation to historically achieved rates, the former targets in the South East Plan, the changed economic climate and land supply.</li> <li>• The Inspector appears to have placed significant weight on the availability of an up-to-date housing trajectory and evidence of consultations with landowners and developers (Gallagher – Western Expansion Area, PfP – Brooklands, HCA – 400+ha land portfolio and Barratt Homes – Central MK) (MKC/8).</li> <li>• Further evidence in the form of Statements of Common Ground with other landowners/developers (The Burford Group and Merton College and Connolly Homes is included in MKC/11).</li> <li>• Nevertheless, the Inspector considered that the annual housing target of 1,750 homes should be expressed as a minimum and that Plan should commit to an early review.</li> </ul> <p><b>Transport:</b></p> <ul style="list-style-type: none"> <li>• The Inspector refers to the considerable volume of evidence – including a Local Transport Plan and modelling (both outlined in MKC/10). Significantly, the modelling results demonstrated that whilst the highway network operation is worse than at present it is “broadly reasonable” in that the network still operates effectively and efficiently (assuming that existing trends in car usage and modal share were to continue).</li> <li>• It highlights 24 problematic junctions that would operate beyond their designed capacity, but the Local Investment Plan identifies necessary remedial work. However, the Council set out its objectives to manage down road traffic by way of a series of softer interventions (behaviour change) to deliver a modal shift from car to cycling/walking/public transport. The Inspector accepts that the balance is about right between car and more sustainable modes.</li> </ul> <p><b>Environmental Standards/Decentralised Energy (DE):</b></p> <ul style="list-style-type: none"> <li>• Evidence on the technical feasibility and economic viability of policies on these issues did not stand up to scrutiny and the Council proposed modifications to tone down policy requirements – making reference to economic viability in relation to standards and requiring only consideration of DE.</li> </ul> <p><b>Place-shaping principles for SUEs in adjacent Local Authorities</b></p> <ul style="list-style-type: none"> <li>• The Inspector was satisfied with Policy CS6, which sets out principles of development during the joint working on planning, design and implementation – with emphasis on delivery.</li> </ul> <p><b>Infrastructure Delivery:</b></p> <ul style="list-style-type: none"> <li>• The Inspector noted that the MK Tariff for the Eastern and Western Expansion Areas is a strength – with a £/per unit contribution and forward funding from the HCA. The Council has a Planning Obligations SPD in place for other areas. The Inspector acknowledges that in future CIL may yield less funding than the Tariff and that reductions in Government funding and in benefits-in-kind works carried out by developers may increase the funding gap.</li> <li>• The Inspector appears to have put considerable weight on the Council’s “very strong track record” in planning and delivering infrastructure and the sound financial planning, risk management, co-ordination and delivery arrangements that are in place.</li> </ul>	



- MKC/13 outlines the use of a Programme Management Board, Joint Delivery Teams and Local Investment Plan. The Inspector also welcomed Section 18 of the Plan which identifies the relationship between development milestones and the provision of infrastructure.
- Although the Inspector does not comment on it, Appendix D of the Plan provides a useful explanation of the School Place Planning process.

**Lessons:**

- Evidence of consultation with landowners and prospective developers is important.
- Policy wording should be suitably flexible to take account of economic viability.
- Evidence of past delivery by LPAs of housing and associated infrastructure helps provide confidence that sites are likely to be delivered in the future.

<b>Local Planning Authority:</b> Newark and Sherwood District Council	<b>Name of Inspector:</b> Michael J Hetherington
<b>Development Plan:</b> Draft Newark and Sherwood Core Strategy	<b>Decision:</b> Sound, subject to additional modifications. Inspector's Report dated 11-03-11
<p><b>Background</b>  The Plan was examined in November and December 2010, prior to the revocation of the Regional Strategy for the East Midlands, the publication of the NPPF and the Duty to Cooperate. The Core Strategy Examination pages (including documents) are no longer available on the Council's website.</p> <p><b>Overall Approach</b></p> <ul style="list-style-type: none"> <li>• Strengthen the role of Newark as a Sub-Regional Centre by ensuring that the town is the main focus for new housing etc. (70% of overall growth)</li> <li>• Address regeneration and growth needs by focusing remaining growth in Service Centres (20% of overall growth) and Principal Villages (10%)</li> <li>• Deliver SUEs in Newark through the allocation of three strategic sites (South of Newark, East of Newark and Fernwood). The separate policies and justifying text for these SSAs makes reference to specific infrastructure requirements needed to deliver them (also set out in an appendix of a separate Infrastructure Delivery Plan (IDP)) as well as assumptions on phasing and build-out rates</li> <li>• Identify other sites to meet needs in a separate Allocations and Development Management DPD (adopted in July 2013).</li> </ul> <p><b>Matters 11/12 Strategic Sites.</b></p> <p>i) <b>Is there robust and realistic evidence to justify the nature and extent of the site designations and proposed distribution of uses?</b></p> <p>ii) <b>Are the locations and sitings suitable, sustainable and appropriate?</b></p> <ul style="list-style-type: none"> <li>• The Inspector recognised the significance of the strategic sites to the overall plan. He was satisfied (amongst other things) that an analysis of the physical, social and environmental infrastructure needed to support the proposed amount of development had been undertaken in the separate IDP and that this had influenced the proposed mix and distribution of uses.</li> <li>• The Inspector was satisfied that the District Wide Transport Study and associated traffic modelling had established the need for a Southern Link Road (SLR).</li> </ul> <p><b>Matters 11/12 Strategic Sites</b></p> <p>iii) <b>Can the proposals be delivered or are there any significant constraints?</b></p> <p>iv) <b>Is the impact on the local areas acceptable in principle?</b></p> <p><u>South of Newark</u></p> <ul style="list-style-type: none"> <li>• The Inspector referred to the long-standing nature of the proposals (being endorsed at previous Local Plan Inquiries) and the advancement of the proposals through various studies – including the Strategic Flood Risk Assessment and SLR design work.</li> <li>• Reference made to information submitted in support of current planning applications (including an Environmental Statement)</li> <li>• The IDP was discussed at the examination hearing and held up to scrutiny – giving the Inspector confidence about delivery of infrastructure</li> <li>• The Inspector noted that new facilities and services should also provide tangible benefits for existing residents of Hawtonville (one of the most deprived wards in the District).</li> <li>• The Inspector noted that following the competition of the proposed SLR, cumulative traffic generation impacts on other parts of the road network could be left to be addressed through a Transport Assessment (TA) connected with specific proposals.</li> </ul> <p><u>East of Newark</u></p> <ul style="list-style-type: none"> <li>• New road links should be from the north, obviating the need for additional use of local level rail crossings on the East Coast Main Line (ECML).</li> <li>• Discussion at the Examination established common ground that the policy wording should be more flexible and that there was no need to preclude all development in a certain part of the site</li> <li>• The Inspector noted that additional traffic movements on the surrounding road network and</li> </ul>	

mitigation could be left to be addressed as part of a TA in the context of specific proposals.

- The Inspector noted that the masterplan in the plan was indicative only and that the Council acknowledged that there was not a need to impose detailed phasing limits; concluding that such matters are best finalised and implemented in the context of site specific proposals.
- The Inspector was not convinced by Network Rail's request that an existing level crossing be replaced by a new bridge; accepting that the likely direct cost (£8 - £10m) and practical implications (land acquisitions, embankments close to existing homes and temporary rail closures) would be disproportionate and would need to be met by a larger development/extended SSA. He concluded that the proposed site could satisfactorily provide the required number of homes and that requiring a larger development was neither reasonable nor economically realistic.

#### Land at Fernwood

- Indicative masterplans respond to strong physical boundaries (including the A1 and ECML – with associated noise – and high voltage electricity line) and flood risk zones confirm that the proposed SUE is sufficiently large to provide the required number of homes.
- The Inspector noted the opportunity to incorporate a secondary school in the SUE to serve it and the wider area (N.B whilst the Infrastructure schedule for Newark lists the need for 1 x secondary school, this is not ascribed to any one of the SSAs).
- Again, the Core Strategy should not be prescriptive about phasing
- Again, the Inspector noted that additional traffic movements on the surrounding road network and mitigation could be left to be addressed as part of a TA in the context of specific proposals.

#### **Matters 11/12 Strategic Sites**

##### **v) Can the proposals be delivered or are there any significant constraints?**

- The Inspector noted that delivering an average of 150 new houses per year on each of the three SSAs would be no easy task.
- Nevertheless, each site was large enough to facilitate construction by three or more housebuilders and the lack of need to directly restrict total numbers in relation to the SLR would help provide flexibility.

#### **Lessons**

- The inclusion in the Plan of illustrative 'masterplans' (in this case basic development frameworks/organising diagrams) help provide confidence over delivery.
- Detailed traffic effects and associated mitigation are matters that are capable of being left to be determined by Transport Assessments associated with specific proposals.
- Policy wording should be suitably flexible so as not to unnecessarily preclude development in certain areas or to be too prescriptive in terms of the phasing of development.
- Opportunity to improve facilities/services for existing residents as well as provide for future residents is a relevant consideration.

<b>Local Planning Authority:</b> Tamworth Borough Council	<b>Name of Inspector:</b> David Vickery
<b>Development Plan:</b> Draft Tamworth Local Plan (2006-2028)	<b>Decision:</b> Plan withdrawn following the Inspector's recommendation. 05-04-13
<p><b>Background</b></p> <p>The Inspector set out his key concerns about the Plan on 22-01/13, in advance of the Preliminary Meeting on 12/02/13. Following the meeting, the Council offered to provide additional evidence and make a number of modifications to address the Inspector's concerns. However, the Inspector later confirmed that he thought the necessary work to make a sound plan might open it up to legal challenge. In the face of this, the Council formally withdrew the Plan.</p> <p><b>Overall Approach</b></p> <ul style="list-style-type: none"> <li>• Strategic Housing Allocation of Amber Valley Sustainable Urban Neighbourhood (at least 1,150 homes) (specific infrastructure requirements identified)</li> <li>• Potential future Broad Development Location to north of the above site (in Lichfield and North Warwickshire) (at least 1,000 homes) (necessary infrastructure to be identified)</li> <li>• Other un-allocated sites identified in SHLAA</li> </ul> <p><b>Inspector's Key Concerns</b></p> <p>The key concerns relating to effectiveness were as follows:</p> <p><u>Distribution of Housing</u></p> <ul style="list-style-type: none"> <li>• The SHMA (B8) proposes a certain geographical distribution of housing around wards, but the Plan does not achieve this.</li> </ul> <p><u>Allocations</u></p> <ul style="list-style-type: none"> <li>• There is only one clear housing allocation (SP6 Anker Valley strategic site). The Plan 'identifies' other sites, but devolves important decisions to future SPDs. The Inspector thought that the Council should either formally allocate the sites for housing or clarify that later Local Plans will be prepared for these sites (not SPDs)</li> <li>• Some large sites in the SHLAA (B8) are not allocated in the Plan for housing (some are allocated on the Policies Map for open space). The Inspector thought that the Council should allocate the necessary SHLAA sites in the Plan</li> <li>• Several of the sites in the 2001-2011 Local Plan appear to 'lapse' their housing allocations in this Plan and also have deliverability problems e.g. access and contamination. Should these allocations be continued in this Plan? If not, why not? Are the sites actually deliverable given the acknowledged problems and the fact that they have not yet been implemented despite previous allocation? Where is the financial viability information to indicate their deliverability?</li> </ul> <p><u>Residential Development</u></p> <ul style="list-style-type: none"> <li>• Much more information is needed for the allocated Anker Valley site. The Plan should establish the principles (constraints, land uses and scale, necessary infrastructure and number of homes that could be provided before the proposed link road, what needs to be provided by when and who will fund and deliver it and milestones for progression of development). An indicative masterplan would help.</li> <li>• The Housing Trajectory (K4) is unclear about numbers, where and when all the required housing will be accommodated in the Plan period. This should include the 1000 homes which would be provided in other LPAs (Lichfield and North Warwickshire).</li> <li>• Lack of detail in Plan to guide the principle, timing and impact of the 1000 homes that would be built outside of the Borough. This includes details of impacts, necessary infrastructure and whether highways can cope (the proposed homes appear to be omitted from the Highway Agency's Modelling Report (F2)).</li> <li>• Concern that the proposed 500 homes in North Warwickshire would be dispersed and not physically related to Tamworth. Could such housing be seen as part of Tamworth's housing supply?</li> </ul>	

- Some representations argue that the Council has under-allocated sites. If true, this would exacerbate problems.

#### Deliverable and so effective

- The Infrastructure Delivery Plan (Appendix 6 of Plan) does not detail all of the significant infrastructure costs associated with the Anker Valley site (link road/s, rail bridges, schools, health etc.). It is not clear what infrastructure is needed before each phase could proceed. The need for the link road and a transport link is a key matter of principle that needs to be resolved before allocation
- Very little information on financial viability of infrastructure costs
- Particular concern that the Amber Valley site does not have an overall viability assessment to demonstrate that it can actually be delivered. The viability assessment in E2 is not up-to-date or comprehensive.
- Concerns over Anker Valley are heightened because (a) the site is due to make an early contribution to numbers and (b) the site is allocated in the current plan, with no signs of progress.

#### Flexibility

- Too much pinned on the Anker Valley site; given concerns about deliverability this is too risky. Appendix 4 of Plan does not provide effective flexibility or contingency planning.

#### Duty to Co-operate

- Whilst Memorandum of Understandings exist with neighbouring Lichfield and North Warwickshire for each to provide 500 homes of Tamworth's need, there is no evidence of infrastructure implications this would have on Tamworth or of impacts the development would have on the host Boroughs.

#### **Lessons:**

- Proposed Allocations need to be based on a thorough understanding of evidence in in the SHMA, SHLAA and an assessment of the effectiveness of carrying forward previously allocated sites (which have not delivered despite allocation).
- Need for sufficient housing sites to be allocated in Plans themselves, rather than the promotion of sites identified in the SHLAA by way of SPDs (which is uncertain/risky).
- Allocations need to establish key principles (including constraints, land uses and scale, necessary infrastructure, thresholds for the delivery of infrastructure, funding, delivery and milestones) and masterplans can help achieve this.
- Importance of sufficient information to demonstrate likely financial viability.
- If relying on the delivery of additional housing in a neighbouring authority to help meet the objectively assessed housing requirement, such housing should be physically related to the District and there needs to be sufficient evidence to demonstrate likely delivery (including mitigation of likely impacts on the host and exporting authorities, infrastructure requirements and financial viability).

<b>Local Planning Authority:</b> Taunton Deane Borough Council	<b>Name of Inspector:</b> John R Mattocks
<b>Development Plan:</b> Taunton Deane Core Strategy 2011-2028	<b>Decision:</b> Sound, subject to additional modifications. Inspector's Report 03-07-12
<p><b>Background</b>  The Plan was examined in February 2012, prior to the revocation of the Regional Strategy for South-West England, the publication of the NPPF and the Duty to Cooperate.</p> <p><b>Overall Approach</b></p> <ul style="list-style-type: none"> <li>• Strategic Sites (Allocations) for sites in Taunton and Wellington to deliver 5-year housing requirement (specific infrastructure requirements identified)</li> <li>• Broad Locations for growth identified at Staplegrove and Comeytrowe/Trull to deliver growth after 2015 (emphasis on masterplanning to identify and deliver infrastructure requirements)</li> <li>• Commitment to prepare a future Site Allocations and Development Management DPD to Identify Strategic Sites in <ul style="list-style-type: none"> <li>○ Broad Locations</li> <li>○ Major Rural Centres</li> <li>○ Minor Rural Centres and</li> <li>○ Review allocations in adopted Taunton Town Centre AAP</li> </ul> </li> </ul> <p><b>Topic Area 5 – Deliverability, Transport and Infrastructure</b></p> <ul style="list-style-type: none"> <li>• The Inspector considered that the Infrastructure Delivery Plan (IDP) provides sound support for the strategy – accepting that it focusses primarily on the first five years.</li> <li>• The IDP identifies essential requirements for strategic allocations at Monkton Heathfield and Priorswood/Nerrols (with developers of the Monkton Heathfield SUE supportive, despite a 'roof tax' of £20,000 per home.</li> <li>• Reference made to much more information on infrastructure requirements and hence deliverability being provided by the development consortium behind a scheme for part of the Comeytrowe broad location.</li> <li>• The Inspector accepted the need for capacity enhancement at Junction 25 of the M5 - no discussion about assessment/impacts, but reference to a Statement of Common Ground with the Highways Agency. He also accepted the reference in the Plan to uncertainty about the possible need for an additional motorway junction to the north-east of Taunton and the inclusion of ". the scale of growth proposed for Taunton suggests that the position should be kept under review."</li> </ul> <p><b>Topic Area 6 – The spatial strategy, Taunton strategic sites and broad locations</b></p> <ul style="list-style-type: none"> <li>• Some discussion about a Habitats Regulation Assessment (HRA) and the need for the timely provision of mitigation measures (replacement habitat) for bats (replacement planting needing to be functional before habitat loss). The Inspector accepted evidence in the HRA and evidence that supported applications that timescales for delivery of strategic sites and one of the 'broad locations' was acceptable.</li> <li>• Existence of a masterplan and protocol setting out intended delivery programme and developer representations convince the Inspector that delivery on the Monkton Heathfield site is likely to be at least as rapid as that assumed in the housing trajectory (despite slippage).</li> <li>• Crown Estates suggested that development may be more rapid than assumed in the housing trajectory at Priorswood/Nerrols</li> <li>• In terms of proposed allocations, the Inspector accepts that there must always be a degree of uncertainty about delivery – but refers to representations from the development industry and extensive studies as confirming that the strategy is likely to be effective</li> <li>• In terms of two 'broad locations' for urban extensions at Staplegrove and Comeytrowe <ul style="list-style-type: none"> <li>○ Important distinction from allocated sites (less detail on precise development requirements and infrastructure provision)</li> <li>○ Need to allocate sites within the 'broad locations' asap in order to ensure that there is a realistic prospect of development taking place in accordance with trajectory/provide contingency)</li> <li>○ Policies SS6 and SS&amp; for the two broad locations require masterplans to identify</li> </ul> </li> </ul>	

infrastructure requirements (supported approach – on the basis that this should include all developers/landowners and the Council). The policy also makes clear that piecemeal development would not be acceptable.

- Concern expressed about sustainable transport package to support
- Support for modifications to refer to the Site Allocations and Development Management DPD to enable formal allocations asap

**Lessons:**

- Uncertainty in terms of specific infrastructure works is not fatal; as long as a reasonable level of work has been done to show that there are options to address issues, and the key relevant stakeholders have not objected or identified (with evidence) potential show stoppers.
- Comprehensive evidence from promoters/landowners is important in building confidence and addressing uncertainty.
- Indicative masterplans are helpful in building confidence over deliverability.
- The Core Strategy, which does not in itself allocate sites, needs to commit to the preparation of the early production of a subsequent development plan that allocates sites within identified Broad Locations in order demonstrate that there is realistic prospect of development taking place (Taunton Deane).

<p><b>Local Planning Authority:</b> Winchester City Council and South Downs National Park Authority</p>	<p><b>Name of Inspector:</b> Nigel Payne</p>
<p><b>Development Plan:</b> Winchester District Local Plan Part 1 – Joint Core Strategy</p>	<p><b>Decision:</b> Sound, subject to additional modifications. Inspector’s Report 11-02-13</p>
<p><b>Background</b> The Plan was examined in October and November 2012. This was before the revocation of the SE Plan.</p> <p><b>Overall Approach</b> Focus new development in Winchester Town, South Hampshire Urban Areas and Market Towns and Rural Areas.</p> <p>Strategic Housing Allocations:</p> <ul style="list-style-type: none"> <li>• North Winchester – approx. 2,000 homes – reference (amongst other things) to Infrastructure Delivery Summary setting out necessary infrastructure and the need for a masterplan including indicative layout and phasing plan).</li> <li>• West of Waterlooville – approx. 3,000 homes - reference (amongst other things) to Infrastructure Delivery Summary setting out necessary infrastructure, the need to provide a new access road, funding of off-site transport improvements, provision of primary school places and contributions to off-site improvements to secondary education). The justifying text also refers to the PUSH Green Infrastructure Strategy</li> <li>• North Whiteley – approx. 3,500 homes - reference (amongst other things) to: <ul style="list-style-type: none"> <li>○ Provide pre-school facilities, additional primary school places and a secondary school, along with other physical and social infrastructure (as set out in the Infrastructure Delivery Summary, including provision, as required, for primary health care in the locality;</li> <li>○ Provide a comprehensive assessment of existing access difficulties affecting Whiteley, agree solutions prior to planning permission being granted, and incorporate specific proposals to ensure that these are implemented at an early stage of the development;</li> <li>○ Undertake a full TA to ensure that the package of mitigation measures are incorporated into the scheme;</li> <li>○ Complete Whiteley Way at an early stage of development;</li> <li>○ Provide measures to ensure that smarter transport choices are made to achieve a modal shift which minimises car usage, manages the impact of private cars on the highway network, and implements measures necessary to accommodate additional traffic, to include improvements to junction 9 of the M27 to be agreed with the relevant highway authorities; and</li> <li>○ Include a Green Infrastructure Strategy.</li> </ul> </li> <li>• Strategic Development Area north of Fareham - cooperate with Fareham Borough Council to help develop 6,500 - 7,500 homes with land within Winchester District to form part of the open areas to ensure separation between the SDA and the existing settlements of Knowle and Wickham.</li> </ul> <p><b>Issue 5 – West of Waterlooville</b></p> <ul style="list-style-type: none"> <li>• The Inspector was satisfied that following various permissions and commencement of development, delivery should proceed in accordance with the housing trajectory.</li> <li>• The Inspector recommends making anticipated numbers “about” rather than precise numbers of homes and amount of employment space and that (to take account of on- going viability considerations) the 40% affordable housing target should be expressed as “should” rather than “will” (This reflects representations made by Grainger).</li> <li>• The s106 agreements with the County Council over school provision provides some flexibility as to how additional places are provided and the Inspector recommends that the policy refers to “primary school places” rather than “two primary schools.”</li> </ul> <p><b>Issue 6 – North Whiteley</b></p> <ul style="list-style-type: none"> <li>• This was found sound despite uncertainty relating to the need for a bypass to support the proposed strategic site, with technical assessment incomplete. The Inspector accepted a modification by the Council that requires improvements to Junction 9 of the M27 to be agreed with</li> </ul>	



the relevant highway authorities., continuing “Although not all the necessary detailed technical analysis on transport is as yet fully complete, the work undertaken to date is sufficient to demonstrate a very strong likelihood that all the necessary transport elements of the overall scheme would be practically and economically deliverable.”

- Similarly, the Inspector accepted that in the absence of detailed proposals it was not possible to finalise primary health care requirements and accepted a Council modification to require “as necessary”.
- The Inspector concluded that the Consortium did not need to make financial contributions towards providing a by-pass for a nearby village (Botley), partly on the basis that Hampshire County Council did not think that the expected increase in traffic justified this.
- Given requirements for a link road and school place provision, the Inspector encouraged modifications to make affordable housing targets more flexible (to ensure a viable scheme)
- North Whiteley allocation is supported by a viability report prepared by the Whiteley Consortium based on the provision of 3,500 homes. The plan referred to 3,000 homes, but alluded to the possibility of a higher number being achievable in due course. The Inspector supported a Council modification to refer to 3,500 in the policy.

#### **Issue 7 – Barton Farm, Winchester**

- Outline permission had been granted for 2,000 homes and the Inspector conclude that in the absence of any land assembly issues, there is every indication that this will proceed (although, again, the Inspector supported modifications to ensure appropriate flexibility, this time in relation to phasing)

#### **Issue 12 – Infrastructure, Delivery, Flexibility, Monitoring, Implementation**

- The Council’s Infrastructure Delivery Plan (EB106) sets out detailed requirements for each of the proposed Allocations. This is supported by separate infrastructure studies for each of the proposed allocations (BP5, BP6 and BP7).
- The Council also submitted a Viability Study (EB101) that considered requirements on a cumulative basis
- The Inspector supported a Council modification to add reference in Plan to the need for additional household waste recycling facilities in relation to North Whiteley.

#### **Lessons**

- Uncertainty in terms of specific infrastructure works or their funding is not fatal; as long as a reasonable level of work has been done to show that there are options to address issues, and the key relevant stakeholders have not objected or identified (with evidence) potential show stoppers
- Allocations’ policies should be drafted with reasonable flexibility to allow for scheme development and financial viability in changing economic circumstances, avoid spurious accuracy when quoting figures and avoid unnecessary detail.

This page is intentionally left blank

**Extracts from the 'Beta Test' Version of the Planning Practice Guidance**

**A): Local Plans**

**How should a Local Plan reflect the presumption in favour of sustainable development?**

Paragraph 15 of the National Planning Policy Framework indicates that Local Plans should be based upon and reflect the presumption in favour of sustainable development. This should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally.

**How can the local planning authority show that a Local Plan is capable of being delivered?**

A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when. This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded, and ensuring that the requirements of the plan as a whole will not prejudice the viability of development.

Early discussion with infrastructure and service providers is particularly important to help understand their investment plans and critical dependencies. The local planning authority should also involve the Local Enterprise Partnership at an early stage in considering the strategic issues facing their area, including the prospects for investment in infrastructure.

The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. For the later stages of the plan period less detail may be provided as the position regarding the provision of infrastructure is likely to be less certain. If it is known that a development is unlikely to come forward until after the plan period due, for example, to uncertainty over deliverability of key infrastructure, then this should be clearly stated in the draft plan.

Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.

The evidence which accompanies a draft Local Plan should show how the policies in the plan have been tested for their impact on the viability of

development, including (where relevant) the impact which the Community Infrastructure Levy is expected to have. Where local planning authorities intend to bring forward a Community Infrastructure Levy regime, there is a strong advantage in doing so in parallel with producing the Local Plan, as this allows questions about infrastructure funding and the viability of policies to be addressed in a comprehensive and coordinated way.

### **What role should the local planning authority play in neighbourhood planning?**

A local planning authority must:

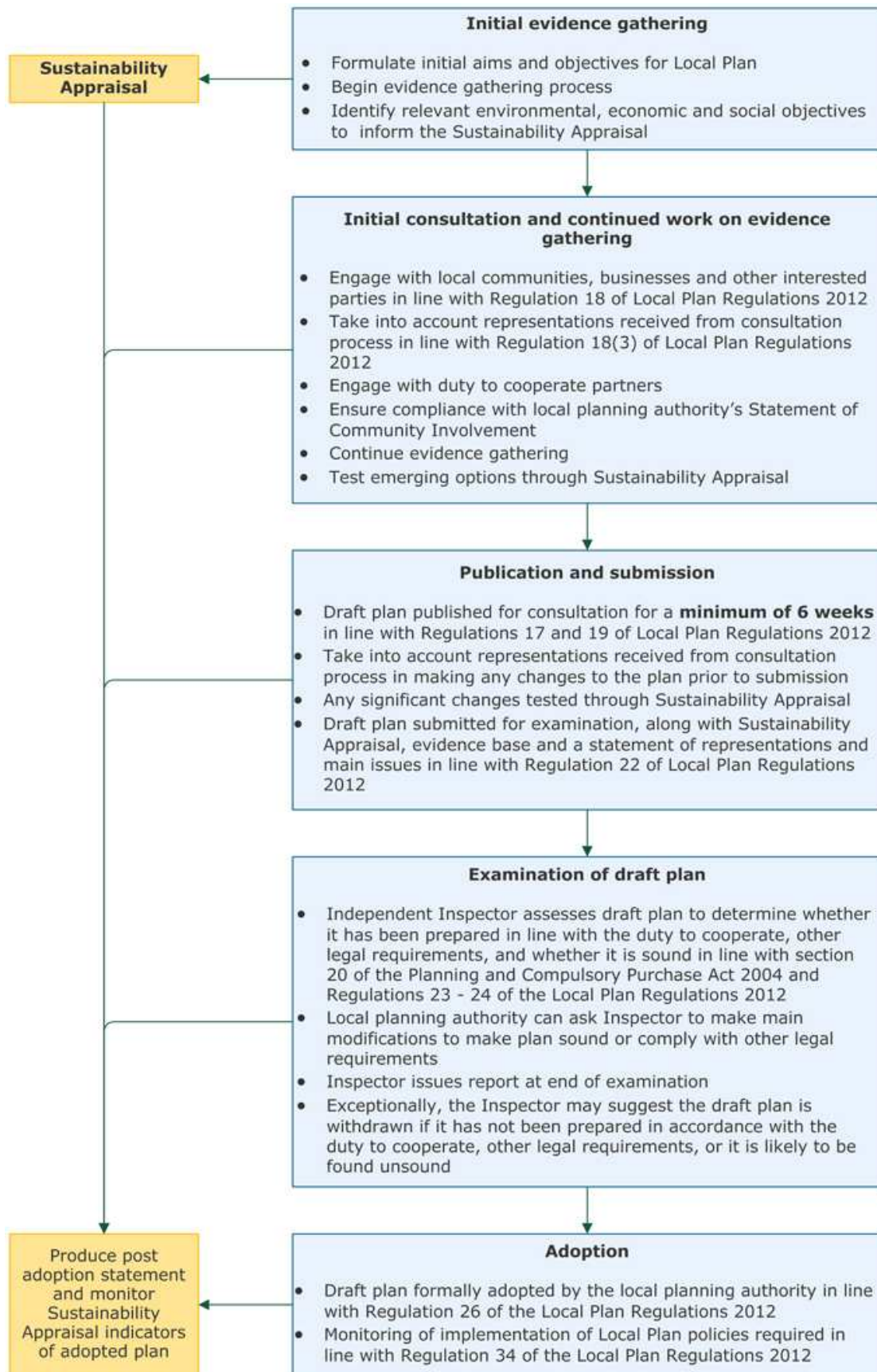
- take decisions at key stages in the neighbourhood planning process
- provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan or Order as required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

### **Should all the Local Plan policies be contained in one document?**

The National Planning Policy Framework makes clear that the Government's preferred approach is for each local planning authority to prepare a single Local Plan for its area (or a joint document with neighbouring areas). While additional Local Plans can be produced, for example a separate site allocations document or Area Action Plan, there should be a clear justification for doing so.

Neighbourhood plans, when brought into force, become part of the statutory development plan for the area that they cover. They can be developed before, after or in parallel with a Local Plan, but the law requires that they must be in general conformity with the strategic policies in the adopted Local Plan for the area (and any other strategic policies that form part of the statutory development plan where relevant, such as the London Plan), irrespective of when this came into effect. Where a neighbourhood plan has been made in advance of a new Local Plan being submitted for examination, the local planning authority should take into account the neighbourhood plan in preparing its strategy and policies, and avoid duplicating policies that are in the neighbourhood plan.

The guidance includes the following chart showing the process of Local Plan development:



## **B): Duty to Co-Operate**

### **What is the duty to cooperate and what does it require?**

The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation relating to strategic cross boundary matters.

Local planning authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination.

Local planning authorities will need to satisfy themselves about whether they have complied with the duty. As part of their consideration local planning authorities will need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters.

### **How does the duty to cooperate relate to the Local Plan test of soundness?**

The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. It is separate from but related to the Local Plan test of soundness.

The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with. The examination will also test whether the Local Plan is sound. The test of soundness, set out in full in the National Planning Policy Framework (paragraph 182), assesses whether the Local Plan is:

- positively prepared;
- justified;
- effective; and
- consistent with national policy.

In assessing whether the Local Plan is effective the Inspector will assess whether it is deliverable within the timescale set by the Local Plan and if it demonstrates effective joint working to meet cross boundary strategic priorities. If a Local Plan is found unsound at the examination the Inspector will recommend that it is not adopted (although an Inspector must recommend modifications that would make a Local Plan sound if asked to do so by the local planning authority).

## **Who is responsible for the duty?**

Local planning authority councillors and officers are responsible for leading discussion, negotiation and action to ensure effective planning for strategic matters in their Local Plans. This requires a proactive, ongoing and focussed approach to strategic planning and partnership working.

## **Are other public bodies subject to the duty to cooperate and what is required of them?**

Other public bodies, in addition to local planning authorities, are subject to the duty to cooperate under the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by The National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013

These bodies are:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as English Heritage)
- Natural England
- the Mayor of London
- the Civil Aviation Authority
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail Regulation
- Transport for London
- each Integrated Transport Authority
- each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- the Marine Management Organisation.

These organisations are expected to cooperate with local planning authorities, county councils that are not local planning authorities and the other prescribed bodies to make local plans as effective as possible on strategic cross boundary matters. They should be proportionate in how they do this and tailor the degree of cooperation according to where they can maximise the effectiveness of plans.

## **Are Local Enterprise Partnerships and Local Nature Partnerships subject to the duty to cooperate?**

Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty. But local planning authorities and the public

bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making. Local Enterprise Partnerships and Local Nature Partnerships are prescribed for this purpose in Town and Country Planning (Local Planning) (England) Regulations as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 to include Local Nature Partnerships.

This requirement reflects the important role that both Local Enterprise Partnerships and Local Nature Partnerships need to play in strategic planning. Local Enterprise Partnerships have a key role to play in delivering local growth by directing strategic regeneration funds and in providing economic leadership. The commitment of local planning authorities to work collaboratively across Local Enterprise Partnership areas will be vital for the successful delivery of Local Enterprise Partnerships' strategic plans. An effective policy framework for strategic planning matters, including joint or aligned planning policies, will be a fundamental requirement for this.

Local Nature Partnerships work strategically to help their local areas manage the natural environment and they are encouraged to work at a broader 'landscape scale'. Local planning authorities should seek opportunities to work collaboratively with Local Nature Partnerships to deliver a strategic approach to encouraging biodiversity.

### **Is there a specific point in the Local Plan making process when cooperation should occur?**

Cooperation should take place throughout Local Plan preparation – it is important not to confine cooperation to any one point in the process. To ensure that Local Plans are robust and effective, local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages. That will help to identify and assess the implications of any strategic cross boundary issues on which they need to work together. After that they will need to continue working together to develop effective planning policies and delivery strategies. Cooperation should continue until plans are submitted for examination and beyond into delivery and review.

### **Why does the duty to cooperate require local planning authorities to work with local planning authorities and bodies outside their area?**

The duty to cooperate seeks to ensure that local planning authorities lead strategic planning effectively through their Local Plans, addressing social, environmental and economic issues that can only be addressed effectively by working with other local planning authorities beyond their own administrative boundaries. For example, housing market and travel to work areas, river catchments and ecological networks may represent a more effective basis on which to plan for housing, transport, infrastructure, flood risk management, climate change mitigation and adaptation, and biodiversity. The aim is to



encourage positive, continual partnership working on issues that go beyond a single local planning authority's area.

### **What actions constitute effective cooperation under the duty to cooperate?**

There is no definitive list of actions that constitute effective cooperation under the duty. The actions will depend on local needs which will differ. Cooperation should produce effective policies on cross boundary strategic matters. This is what local planning authorities and other public bodies should focus on when they are considering how to meet the duty.

Section 33A(6) of the 2004 Act requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. Local planning authorities are also required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

The activities that fall within the duty to cooperate include activities that prepare the way for or support the preparation of Local Plans and can relate to all stages of the plan preparation process. This might involve joint research and evidence gathering to define the scope of the Local Plan, assess policy impacts and assemble the necessary material to support policy choices. These could include assessments of land availability, Strategic Flood Risk Assessments and water cycle studies.

### **Does the duty to cooperate require additional consultation beyond existing statutory consultees?**

The duty requires additional consultation beyond the existing statutory consultees. The requirement to consult statutory consultees is separate from the duty to cooperate which goes beyond a requirement to simply consult. The duty means that local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process.

### **What outcomes are expected from the duty to cooperate?**

Cooperation between local planning authorities, county councils and other public bodies should produce effective policies on strategic cross boundary matters. Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others.

### **What should a local planning authority do if it is reliant on another local planning authority that will not cooperate?**

Local planning authorities should consider whether they have done all they can at both officer and councillor level to secure necessary cooperation on strategic cross boundary matters.

As part of this process they should consider whether there are different local planning authorities with whom they could work to achieve an effective outcome. Local planning authorities should also satisfy themselves that the planning strategy cannot be delivered in another way and that all policy options have been tested thoroughly.

If local planning authorities consider that the plan falls short for whatever reason, including a lack of cooperation from key partners, they should discuss their concerns with the Planning Inspectorate prior to submitting the plan for examination.

If local planning authorities have tested all available options they may have to accept that their planning strategy cannot be achieved fully, for example they may not be able to meet all of their objectively assessed housing need, without the cooperation of another local planning authority, and submit it for examination on that basis. In these circumstances they should submit a detailed statement and evidence of the actions they have taken to engage cooperatively. Local planning authorities will also need to submit undertakings in writing about the actions that they will take to seek to secure an effective planning strategy in the future.

**How will the Planning Inspectorate test a Local Plan where the evidence suggests that the local planning authority's planning strategy cannot be delivered fully because it has been unable to secure the cooperation of another local planning authority?**

This will depend on the particular circumstances and issues. Inspectors will expect to see robust evidence to support the local planning authority's case. They will examine what actions local planning authorities have taken to seek the cooperation of key partners and the outcome of their efforts.

Where a local planning authority has done all that it can but remains unable to secure the cooperation necessary for effective strategic planning policies, Inspectors will consider the implications for the planning strategy, for example – the extent of unmet housing need and its implications. The Inspector will also consider the willingness of the local planning authority being examined and other key partners to commit, through written agreements, to work together to achieve effective solutions.

Local planning authorities that are unwilling to cooperate with others will eventually have to bring forward their own Local Plan for examination. If they are unable to provide robust evidence to support a strategy that does not plan for the unmet requirements of another local planning authority they may fail the test of compliance with the duty to cooperate or the plan may be found unsound.

**If a local planning authority has adopted a Local Plan is it required to cooperate with another local planning authority that is bringing forward a plan?**

The duty to cooperate applies to all local planning authorities who are in the process of preparing and reviewing a Local Plan, including early scoping and evidence gathering work. So even if a local planning authority has an adopted Local Plan it is still required to cooperate with a local planning authority that is bringing forward its plan.

Local planning authorities are required under section 13 of the 2004 Act to keep under review the matters that may be expected to affect the development of their area or the planning of its development. These matters include physical, economic, social and environmental characteristics, size, composition and distribution of the population, and communications, transport and traffic. A local planning authority may also keep under review these matters in neighbouring areas beyond their administrative boundary if they are expected to affect its area and they must consult the relevant local planning authorities.

The National Planning Policy Framework (paragraph 182) requires local planning authorities to take a strategic approach in their Local Plans. Local Plans should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring local planning authorities where it is reasonable to do so and consistent with achieving sustainable development.

Therefore if a local planning authority preparing a Local Plan provides robust evidence of an unmet requirement, such as unmet housing need, other local planning authorities in the housing market area will be required to consider the implications, including the need to review their housing policies.

Local planning authorities must give details of what action they have taken to comply with the duty in their local planning authority Monitoring Reports at least once a year. This should include details of the actions they have taken to respond constructively to requests for cooperation.

**When is an issue a strategic matter on which cooperation is required?**

Section 33A(4) of the 2004 Act sets out what are strategic matters. This includes sustainable development or use of land that has or would have a significant impact on at least two planning areas, in particular in connection with strategic infrastructure. The National Planning Policy Framework (paragraph 156) further sets out the strategic matters that local planning authorities are expected to include in their Local Plans. This is not an exhaustive list and local planning authorities will need to adapt it to meet their specific needs.

Planning for infrastructure is a critical element of strategic planning. The National Planning Policy Framework (paragraph 162) makes clear that local planning authorities should work with other local planning authorities and

providers to assess the quality and capacity of a range of infrastructure types. This will ensure that key infrastructure such as transport, telecommunications, energy, water, health, social care, and education, is properly planned.

Planning for infrastructure is a key requirement of the effectiveness element of the test of Local Plan soundness which requires plans to be deliverable and based on effective joint working on cross boundary strategic priorities. The involvement of infrastructure providers in Local Plan preparation is critical to ensure that Local Plans are deliverable. Participation in the Local Plan preparation process in turn helps them to inform their business plans and to plan and finance the delivery of infrastructure that they have a legal obligation to provide. It is expected that private utility companies and providers will engage positively in the preparation and delivery of Local Plans.

**Do local planning local planning authorities have to provide any information on how they have met the duty?**

Yes, local planning authorities must give details of what action they have taken under the duty to cooperate to their communities in their local planning authority Monitoring Reports (Local Planning Regulations, regulation 34(6)). This should include actions to both secure the effective cooperation of others and responding constructively to requests for cooperation. It should also highlight the outcomes of cooperation. This should be done at least once a year and information should be published on the local planning authority's website and made available for inspection at their offices.

## **C) Assessment of housing and economic development needs**

### **What is the definition of need?**

Need for housing in the context of the guidance refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.

Need for all land uses should address both the total number of homes or quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment.

Any assessment of need should be realistic in taking account the particular nature of that area (for example geographic constraints and the nature of the market area). Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.

### **Can local planning authorities apply constraints to the assessment of development needs?**

The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.

### **Can local planning authorities use a different methodology?**

The use of this standard methodology is strongly recommended because it will ensure that the assessment findings are transparently prepared. Local planning authorities may consider departing from the methodology, but they should explain why their particular local circumstances have led them to adopt a different approach where this is the case. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance.

Please note that there is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need.

### **With whom do local planning authorities need to work?**

Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.

Where Local Plans are at different stages of production, local planning authorities can build upon the existing evidence base of partner local authorities in their housing market area but should co-ordinate future housing reviews so they take place at the same time.

Local communities, partner organisations, Local Enterprise Partnerships, businesses and business representative organisations, designated neighbourhood forums and parish/town councils preparing neighbourhood plans should be involved from the earliest stages of plan preparation, which includes the preparation of the evidence base in relation to development needs.

### **What areas should be assessed?**

Needs should be assessed in relation to the relevant functional area: either a housing market area, a functional economic area in relation to economic uses, or an area of 'trade draw' in relation to main town centre uses.

Establishing the assessment area may identify smaller sub-markets with specific features, and it may be appropriate to investigate these specifically in order to create a detailed picture of local need. It is important also to recognise that there are 'market segments' (ie not all housing types or economic development have the same appeal to different occupants).

### **Is there a single source that will identify the assessment areas?**

No single source of information on needs will be comprehensive in identifying the appropriate assessment area; careful consideration should be given to the appropriateness of each source of information and how they relate to one another. For example, for housing, where there are issues of affordability or low demand, house price or rental level analyses will be particularly important in identifying the assessment area. Where there are relatively high or volatile rates of household movement, migration data will be particularly important. Plan makers will need to consider the usefulness of each source of information and approach for their purposes. Local planning authorities can use a combination of approaches where necessary.

### **What is a housing market area?**

A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.

The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate.

### **How can housing market areas be defined?**

Housing market areas can be broadly defined by using three different sources of information as follows.

- *House prices and rates of change in house prices*  
Housing market areas can be identified by assessing patterns in the relationship between housing demand and supply across different locations. This analysis uses house prices to provide a 'market-based' reflection of housing market area boundaries. It enables the identification of areas which have clearly different price levels compared to surrounding areas. The findings provide information about differences across the area in terms of the price people pay for similar housing, market 'hotspots', low demand areas and volatility. *Suggested data sources:* Office for National Statistics, House Price Index, Land Registry House Price Index and Price Paid data (including sales), Department for Communities and Local Government Statistics including Live Tables on Affordability (lower quartile house prices/lower quartile earnings), Neighbourhood data from the Census.
- *Household migration and search patterns.* Migration flows and housing search patterns reflect preferences and the trade-offs made when choosing housing with different characteristics. Analysis of migration flow patterns can help to identify these relationships and the extent to which people move house within an area. The findings can identify the areas within which a relatively high proportion of household moves (typically 70 per cent) are contained. This excludes long distance moves (eg those due to a change of lifestyle or retirement), reflecting the fact that most people move relatively short distances due to connections to families, friends, jobs, and schools. *Suggested data sources:* Census, Office for National Statistics Internal Migration Statistics, and NHS registration data. Data from estate agents and local newspapers contain information about the geographical coverage of houses advertised for sale and rent.
- *Contextual data (eg travel to work area boundaries, retail and school catchment areas)* Travel to work areas can provide information about commuting flows and the spatial structure of the labour market, which will influence household price and location. They can also provide information about the areas within which people move without changing other aspects of their lives (eg work or service use). *Suggested data sources:* Office of National Statistics (travel to work areas), retailers and other service providers may be able to provide information about the origins of shoppers and service users, school catchment areas.

### **How can functional economic market areas be defined?**

The geography of commercial property markets should be thought of in terms of the requirements of the market in terms of the location of premises, and the spatial factors used in analysing demand and supply – often referred to as the functional economic market area. Since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area, however, it is possible to define them taking account of factors including:

- extent of any Local Enterprise Partnership within the area;
- travel to work areas;

- housing market area;
- flow of goods, services and information within the local economy; service market for consumers;
- administrative area;
- transport network.

Suggested Data Source: Office of National Statistics (travel to work areas)

**What is the starting point to establish the need for housing?**

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

The household projections are produced by applying projected household representative rates to the population projections published by the Office for National Statistics. Projected household representative rates are based on trends observed in Census and Labour Force Survey data.

The household projections are trend based, ie they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.



## EAST HERTS COUNCIL

### DISTRICT PLANNING EXECUTIVE PANEL – 3 OCTOBER 2013

#### REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

#### DEVELOPER/LANDOWNER QUESTIONNAIRES AND ATLAS MEETINGS

WARD(S) AFFECTED: ALL

### **Purpose/Summary of Report**

- This report sets out actions taken to date to obtain pertinent information from relevant landowners/developers/agents with an interest in land in the shortlisted Areas of Search to establish deliverability;
- It also seeks approval to the information received forming part of the evidence base to inform and support the preparation of the District Plan.

#### **RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:**

<b>(A)</b>	<b>The responses to the Developer Questionnaires (including subsequent information supplied), and the meeting notes between ATLAS and developers and/or their representatives, be supported as part of the evidence base to inform and support the preparation of the District Plan.</b>
------------	--

#### **RECOMMENDATIONS FOR COUNCIL: That:**

<b>(A)</b>	<b>The responses to the Developer Questionnaires (including subsequent information supplied), and the meeting notes between ATLAS and developers and/or their representatives, be agreed as part of the evidence base to inform and support the preparation of the District Plan.</b>
------------	---

1.0 Background

1.1 Following the agreement of Council of a shortlist of options for

further testing in connection with the emerging District Plan on 7th August 2012 (at that time relating to the development of Part 1 – Strategy), questionnaires were sent to relevant landowners/developers/agents with an interest in those areas of land remaining in the selection process. These questionnaires sought to establish the deliverability of land in those areas in order that the Council would have sufficient confidence that its strategy could be delivered once finalised.

- 1.2 This report details the outcome of those requests for information and related work undertaken since that time.
- 2.0 Report
- 2.1 During the early stages of the Area of Search sieving process (at Steps 1 to 3), it was not considered necessary that contact be made by Officers to landowners or their representatives, other than in relation to the separate Call for Sites process. This was due to the high level nature of the appraisals being undertaken and the unmanageability of the process given the numbers of potential site contacts involved at that time.
- 2.2 However, at the stage that the list was reduced from 69 initial Areas of Search to those contained within the scenarios agreed in respect of District Planning Executive Panel 26 July 2012 Agenda Item 10 – District Plan Part 1: Strategy Supporting Document – Chapter 4: Places and Next Steps (ERP B Table 2: Summary of Outcomes from Sieve 2: Settlement Evaluations), it became necessary to establish, firstly, whether interest still remained in bringing those areas of land forward for development and, secondly, to elicit more detailed information beyond that supplied via the original Call for Sites exercise. This more comprehensive level of data would ensure that decisions would be made on the basis of a more up-to-date evidence base than previously available. Additionally, and most importantly, this would ensure that any areas selected would offer greater confidence of deliverability within the plan period and that any necessary infrastructure would be capable of being put in place in a timely manner.
- 2.3 While it was noted that some landowners, developers and agents with interests in locations within the district would have welcomed the opportunity to meet with Officers to promote their sites, it was decided that it would be more appropriate to elicit information in the form of a questionnaire. This was not only related to practical

issues of staff resources and the ability to carry out the significant amount of work required towards public consultation on the Council's Preferred Strategy, but more importantly that it would avoid the potential that any landowners might consider that there had been any inequitable treatment of parties.

- 2.4 It was therefore determined that, unless Officers considered that there was an exceptional overriding reason for a meeting to take place, there would be no meetings with developers directly, but that information would be sought through written questions. This would also have the distinct advantage that all dialogue would be in the public domain.
- 2.5 Questionnaires were therefore disseminated to points of contact for those areas of land submitted previously via the Call for Sites for all the scenarios carried forward to Sieve 3 (and which excluded villages except where they formed part of one of these scenarios). The questionnaires were sent during the latter part of August 2012 with a deadline for the receipt of responses of Friday 28th September 2012. It was clearly stated in the accompanying explanatory text that any responses would be made public.
- 2.6 Questionnaires were formed of two parts; firstly, a section generic to all parties, followed by questions specific to individual areas, as appropriate. The standard format was devised to enable better processing of information and for comparisons to be made where appropriate, especially in cases where Areas of Search involved multiple land ownerships.
- 2.7 Responses were subsequently received for all Call for Site submissions within the remaining relevant Areas of Search, as detailed above, albeit that some were delayed due to changes in either land ownership or relevant representatives. Summary tables detailing the questionnaire responses from promoters of land for the remaining Areas of Search for the five main settlements and scenarios involving East of Welwyn Garden City, North of Harlow, and Hunsdon Areas may be found at **Essential Reference Paper 'B'**, the contents of which are available to view at: [www.eastherts.gov.uk/developerinfo](http://www.eastherts.gov.uk/developerinfo) ). Accompanying maps for each show the land availability in those locations, as submitted via the Call for Sites process. The Call for Sites reference numbers and any relevant Sub-Area delineations are displayed for ease of correlation with information contained in the tables.
- 2.8 Two respondents confirmed that they wished to withdraw their

submissions from further consideration. These areas of land both fall within Area of Search 13 (Hertford South Sub-Area C); however, three areas of land remain in the process for consideration within this Sub-Area for which completed questionnaires have been received.

- 2.9 Since the return of the questionnaires some respondents have provided additional information to aid the consideration of their submission areas. This material is also available to view alongside the questionnaires at the same web location detailed above (at paragraph 2.7).
- 2.10 Additional to that data, there remained a need for further clarification to enable full consideration of the development proposals where significant areas of land would be involved and for which delivery would be likely to be dependent on particularly expensive or complex elements of infrastructure.
- 2.11 As proposed in the District Plan – Update Report at the District Planning Executive Panel on 25 July 2013 (Agenda Item 6), the Council has now appointed ATLAS to offer project support in relation to obtaining such information.
- 2.12 Meetings have recently taken place between ATLAS, as an independent impartial body, and representatives of land submissions at the following locations:

**Area of Search 4: Bishop’s Stortford South**

Sub-Area A Land south of Whittington Way (41/002)

**Area of Search 19: Ware North**

Sub-Area A Nun’s Triangle (05/003)

Sub-Area B Land south of Fanhams Hall Road & east of Trinity Centre (44/001)  
Land north of Ware (44/005 part)

**Area of Search 20: Ware East**

Sub-Area A Land east of Ware (05/020 & 44/005 part)

**Area of Search 61: East of Welwyn Garden City**

Birchall Farm (26/003)

**Area of Search 62: North of Harlow**

Sub-Area A Land north of A414/Eastwick Road (21/004 part)

Sub-Area B Land north of A414/Eastwick Road (21/004 part)  
Eastern part of Briggens Estate (29/004)

**Area of Search 69: Hunsdon Area**

Land north of A414/Eastwick Road (21/004 part)

At the time of writing, a telephone conversation was also due to be undertaken by ATLAS in respect of:

**Area of Search 61: East of Welwyn Garden City**

Hatfield Estate (part) (26/004)

- 2.13 The terms of reference and approach to meetings used by ATLAS is included at **Essential Reference Paper 'C'**, while the actual meeting notes detailing the areas of discussion and views expressed are provided via links within the tables on the website discussed at paragraph 2.7. The information gained via this approach can now be utilised to further refine consideration of the remaining Areas of Search. It is also intended that further updates to information submitted by developers/landowners or ATLAS will be added as it becomes available, so in this respect the tables should be viewed as live documents.
- 2.14 Members are therefore invited to approve the information received to form part of the evidence base to inform and support the preparation of the District Plan.
- 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

Developer/Landowner Information Received Following Issue of Questionnaires August 2012

[www.eastherts.gov.uk/developerinfo](http://www.eastherts.gov.uk/developerinfo)

District Planning Executive Panel 26 July 2012 Agenda Item 10 – District Plan Part 1: Strategy Supporting Document – Chapter 4: Places and Next Steps (ERP B Table 2: Summary of Outcomes from Sieve 2:

Settlement Evaluations)

<http://online.eastherts.gov.uk/moderngov/documents/g2025/Public%20reports%20pack%2026th-Jul-2012%2019.00%20District%20Planning%20Executive%20Panel.pdf?T=10>

Contact Member: Cllr Mike Carver – Executive Member for Strategic Planning and Transport  
[mike.carver@eastherts.gov.uk](mailto:mike.carver@eastherts.gov.uk)

Contact Officer: Kevin Steptoe – Head of Planning and Building Control  
01992 531407  
[kevin.steptoe@eastherts.gov.uk](mailto:kevin.steptoe@eastherts.gov.uk)

Report Author: Kay Mead – Senior Planning Officer  
[kay.mead@eastherts.gov.uk](mailto:kay.mead@eastherts.gov.uk)

## ESSENTIAL REFERENCE PAPER 'A'

### IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p><b>People</b> This priority focuses on enhancing the quality of life, health and wellbeing, particularly for those who are vulnerable, and delivering strong services.</p> <p><b>Place</b> This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p><b>Prosperity</b> This priority focuses on safeguarding and enhancing our unique mix of rural and urban communities, promoting sustainable, economic opportunities and delivering cost effective services.</p>
Consultation:	N/A
Legal:	N/A
Financial:	N/A
Human Resource:	N/A
Risk Management:	Failure to seek crucial information from developers regarding deliverability issues could lead to the District Plan being found unsound at Examination.

This page is intentionally left blank



Developer/Landowner Information Received Following Issue of Questionnaires August 2012

Bishop's Stortford

Map of Bishop's Stortford

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
Area 1	Bishop's Stortford Built-up Area Goods Yard	N/A	Bishop's Stortford Goods Yard	Solum Regeneration/Savills	Area 1 - Bishop's Stortford Built-up Area - Bishop's Stortford Goods Yard (Questionnaire)  Area 1 - Bishop's Stortford Built-up Area - Bishop's Stortford Goods Yard (Covering letter)
Area 2	Bishop's Stortford North Sub-Area A	01/024	ASRs 1-4, Special Countryside Area & adjoining Green Belt	Bishop's Stortford North Consortium	Area 2A and B - Bishop's Stortford North (Questionnaire)
	Bishop's Stortford North Sub-Area B	01/024	ASRs 1-4 & Special Countryside Area	Bishop's Stortford North Consortium	Area 2A and B - Bishop's Stortford North (Covering letter)  Area 2A and B - Bishop's Stortford North (Letter to Cllr Carver)  Area 2A and B - Bishop's Stortford North (Letter to MP from Star Planning)
		01/008	Land at Hoggate's End	Grange Builders LLP/Jane Orsborn	Area 2B - Bishop's Stortford North - Hoggate's End (Questionnaire)  Area 2B - Bishop's Stortford North - Hoggate's End (Reptile survey)
	Bishop's Stortford North Sub-Area C	01/023	Land north-east of Farnham Road	Countryside Properties	Area 2C - Bishops Stortford North - Land north-east of Farnham Road (Questionnaire)
Area 3	Bishop's Stortford East Sub-Area B	01/014 and 01/136	Land at Bishop's Stortford Golf Club	Weston Homes	Area 3B - Bishop's Stortford East - Land at Bishop's Stortford Golf Club - (Questionnaire)

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
Area 4	Bishop's Stortford South Sub-Area A	41/002	Land south of Whittington Way	Countryside Properties	Area 4A - Bishops Stortford South - Land south of Whittington Way (Questionnaire)  Area 4A - Bishops Stortford South - Land south of Whittington Way (ATLAS Meeting Notes)

### Buntingford

#### Map of Buntingford

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
Area 6	Buntingford South & West Sub-Area B	02/005	Land west of Buntingford	Moult Walker	Area 6B - Buntingford South & West - Land west of Buntingford (Questionnaire)  Area 6B - Buntingford South & West - Land west of Buntingford (Thames Water email)  Area 6B - Buntingford South & West - Land west of Buntingford (Enclosure 1A URS Drawing SK04)  Area 6B - Buntingford South & West - Land west of Buntingford (Enclosure 1B URS Drawing SK02A)  Area 6B - Buntingford South & West - Land west of Buntingford (Enclosure 2 Vincent & Gorbing Site Appraisal Plan)
	Buntingford South & West Sub-Area C	02/006	Aspenden Bridge, Aspenden Road	Moult Walker	Area 6C - Buntingford South & West - Aspenden Bridge (Questionnaire)  Area 6C - Buntingford South and West - Aspenden Bridge (Enclosure 1 URS drawing SK03)  Area 6C - Buntingford South and

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
					West - Aspenden Bridge (Enclosure 2 Vincent & Goring Site appraisal plan 4830.003a)  Area 6C - Buntingford South and West - Aspenden Bridge (Enclosure 3 Thames Water email)  Area 6C - Buntingford South and West - Aspenden Bridge (Enclosure 4 Flood Risk Assessment)
		02/008	Land west of London Road	Gerald Eve Chartered Surveyors	Area 6C - Buntingford South and West - Land west of London Road (Questionnaire)
		02/011	Land at Aspenden Road	Jane Orsborn	Area 6C - Buntingford South and West - Land at Aspenden Road (Questionnaire)
Area 7	Buntingford North Sub-Area A	02/009	Land west of Ermine Street	Pigeon Land Ltd/Evolution Town Planning	Area 7A - Buntingford North - Land west of Ermine Street (Questionnaire)  Area 7A - Buntingford North - Land west of Ermine Street (Report on the development potential of the area)  Area 7A - Buntingford North - Land west of Ermine Street (Applied Ecology Report)  Area 7A - Buntingford North - Land west of Ermine Street (Transport and Utilities Appraisal)  Area 7A - Buntingford North - Land west of Ermine Street (Transport and Utilities Appraisal Appendices)
Area 8	Buntingford North-East Sub Area B	02/004	Land east of Buntingford	DLP Planning Ltd	Area 8B - Buntingford North-East - Land east of Buntingford (Questionnaire)
Area 9	Buntingford East	02/001	Land south of Owles Lane	J Porter	Area 9 - Buntingford East - Land south of Owles Lane (Questionnaire)
		02/002	Land to the rear of Snells Mead	Keymer Cavendish	Area 9 - Buntingford East - Land to the rear of Snells Mead

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
					(Questionnaire)

## Hertford

## Map of Hertford

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
Area 10	Hertford Built-up Area	03/002	National Grid/ Norbury Woodyard	National Grid Property	Area 10 - Hertford Built-up Area - National Grid Norbury Woodyard (Questionnaire)
		N/A	Land south of Mead Lane	Lambert Smith Hampton	Area 10 - Hertford Built-up Area - Land south of Mead Lane (Questionnaire)
Area 11	Hertford West Sub-Area A	03/152	Land north of Welwyn Road	Savills	Area 11A - Hertford West - Land north of Welwyn Road (Questionnaire) Area 11A - Hertford West - Land north of Welwyn Road (Representation Document)
	Hertford West Sub-Area B	03/010	Land west of Thieves Lane & south of Welwyn Road	Woolf Bond Planning	Area 11B - Hertford West - Land west of Thieves Lane and south of Welwyn Road (Questionnaire) Area 11B - Hertford West - Land west of Thieves Lane and south of Welwyn Road (Covering letter) Area 11B - Hertford West - Land west of Thieves Lane and south of Welwyn Road (Development Framework Document)
Area 12	Hertford North Sub-Area C	03/001	Bengeo Plant Nursery	Cerda Planning Ltd	Area 12C - Hertford North - Bengeo Plant Nursery (Questionnaire)
		03/120	Land at Wadesmill Road	Sellwood Planning	Area 12C - Hertford North - Land at Wadesmill Road (Questionnaire) Area 12C - Hertford North - Land at Wadesmill Road (Q14 update letter, Oct 2012) Area 12C - Hertford North - Land at

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
					<p>Wadesmill Road (Covering letter, Dec 2012)</p> <p>Area 12C - Hertford North - Land at Wadesmill Road (Q6 update, Dec 2012)</p> <p>Area 12C - Hertford North - Land at Wadesmill Road (Mineral deposits map, Dec 2012)</p> <p>Area 12C - Hertford North - Land at Wadesmill Road (Groundwater protection zones, Dec 2012)</p> <p>Area 12C - Hertford North - Land at Wadesmill Road (Letter to HCC, Dec 2012)</p> <p>Area 12C - Hertford North - Land at Wadesmill Road (Minerals Strategy, Dec 2012)</p> <p>Area 12C - Hertford North - Land at Wadesmill Road (Site Context Plan, Dec 2012)</p> <p>Area 12C - Hertford North - Land at Wadesmill Road (Minerals update letter and Geological Survey, June 2013)</p> <p>Area 12C - Hertford North - Land at Wadesmill Road (Minerals update letter, July 2013)</p>
Area 13	Hertford South Sub-Area C	03/005	Land west of Mangrove Road	Drivers Jonas Deloitte	Area 13C - Hertford South - Land west of Mangrove Road (Questionnaire) Driver Jonas Deloitte
		03/006	Cricket Ground, Mangrove Road	HCC	N/A – No longer interested in promoting this land for development.
		03/011	Dunkirksbury Farm, Mangrove Lane	Roy Davis	N/A – No longer interested in promoting this land for development.
		03/025	Land west of Mangrove Road	A L Mead	Area 13C - Hertford South - Land west of Mangrove Road

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
		03/153	Land east of Queens Road	Colin Spears/Mick Sandford	(Questionnaire) AL Mead Area 13C - Hertford South - Land east of Queens Road (Questionnaire)

### Sawbridgeworth

#### Map of Sawbridgeworth

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
Area 16	Sawbridgeworth West Sub-Area A	04/007	Land west of Sawbridgeworth	Savills	Area 16A - Sawbridgeworth West - Land west of Sawbridgeworth (part) (Questionnaire)
		04/013	Brickwell Fields	Taylor Wimpey	Area 16A - Sawbridgeworth West - Brickwell Fields (Questionnaire)
	Sawbridgeworth West Sub-Area B	04/005	Land at Thomas Rivers Hospital	Capita Symonds	Area 16B - Sawbridgeworth West - Land at Thomas Rivers Hospital (Questionnaire)  Area 16B - Sawbridgeworth West - Land at Thomas Rivers Hospital (Illustrative Masterplan)  Area 16B - Sawbridgeworth West - Land at Thomas Rivers Hospital (Phasing Plan)
		04/006	Land at Chalks Farm	Barratt David Wilson/Jane Orsborn	Area 16B - Sawbridgeworth West - Land at Chalks Farm (Questionnaire)  Area 16B - Sawbridgeworth West - Land at Chalks Farm (Covering letter)  Area 16B - Sawbridgeworth West - Land at Chalks Farm (Transport Strategy)  Area 16B - Sawbridgeworth West - Land at Chalks Farm (Transport Strategy Appendix A)

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
					<p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Eastern access)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Western access)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Flood risk)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Letter from EA)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Letter to EA)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Extended Phase 1 Habitat survey)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Services Appraisal Report)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: front cover)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Appraisal Issues Report)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Appendices list)</p> <p>Area 16B - Sawbridgeworth West - Land Chalks Farm (Landscape &amp; Visual Impact Assessment: Landscape Context Plan)</p>

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
					<p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Character Assessment: Site Appraisal Plan)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Photo location plan)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Opportunities &amp; Constraints Plan)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Landscape Strategy Plan)</p> <p>Area 16B - Sawbridgeworth West - Land Chalks Farm (Landscape &amp; Visual Impact Assessment: Site appraisal photographs)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Site context photographs)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Appendix A)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Appendix B)</p> <p>Area 16B - Sawbridgeworth West - Land at Chalks Farm (Landscape &amp; Visual Impact Assessment: Appendix C)</p> <p>Area 16B - Sawbridgeworth West -</p>



Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
					Land at Chalks Farm (Landscape & Visual Impact Assessment: back cover)
		04/007 (Part – see also Area 17 below)	Land west of Sawbridgeworth	Savills	Area 16B - Sawbridgeworth West - Land west of Sawbridgeworth (part)
Area 17	Sawbridgeworth North Sub-Area A	04/007 (Part – see also Area 16 Sub-Area B above)	Land west of Sawbridgeworth	Savills	Area 17A - Sawbridgeworth North - Land west of Sawbridgeworth (part)

**Ware**

**Map of Ware**

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
Area 19	Ware North Sub-Area A	05/003	Nuns' Triangle	Barker Parry Town Planning Ltd	<p>Area 19A - Ware North - Nuns' Triangle (Questionnaire)</p> <p>Area 19A - Ware North - Nuns' Triangle (Historic Landscape Assessment)</p> <p>Area 19A - Ware North - Nuns' Triangle (Environment Agency Flood Risk map)</p> <p>Area 19A - Ware North - Nuns' Triangle (Bus route map)</p> <p>Area 19A and B - Ware North - Nuns' Triangle/Land south of Fanhams Hall Road &amp; east of Trinity Centre/Land north of Ware (ATLAS Meeting Notes)</p> <p>Area 19A and B - Ware North - Nuns' Triangle/Land south of Fanhams Hall Road &amp; east of Trinity Centre/Land north of Ware (Info from ATLAS developer responses - Barker Parry Town Planning Ltd)</p>

Ware North Sub-Area B	05/004	Land south of Fanhams Hall Road & east of Trinity Centre	Barker Parry Town Planning Ltd	<p>Area 19B - Ware North - Land south of Fanhams Hall Road (Questionnaire)</p> <p>Area 19B - Ware North - Land south of Fanhams Hall Road (Environment Agency Flood Risk map)</p> <p>Area 19B - Ware North - Land south of Fanhams Hall Road (Bus route map)</p> <p>See also ATLAS Meeting Notes and additional info submitted by Barker Parry Town Planning Ltd to ATLAS</p>	
	44/001	Land north of Ware	Barker Parry Town Planning Ltd	<p>Area 19B - Ware North - Land north of Ware (Questionnaire)</p> <p>Area 19B - Ware North - Land north of Ware (Site map)</p> <p>Area 19B - Ware North - Land north of Ware (Environment Agency Flood Risk map)</p> <p>Area 19B - Ware North - Land north of Ware (Bus route map)</p> <p>See also ATLAS Meeting Notes and additional info submitted by Barker Parry Town Planning Ltd to ATLAS</p>	
	44/005 (Part – see also Area 20 Sub-Area A below)	Land to the north of Ware	Sworders	<p>Area 19B - Ware North - Land to the north of Ware (Questionnaire)</p> <p>Area 19B and 20A - Ware North and East - Land to the north of Ware/Land east of Ware (ATLAS Meeting Notes - Sworders)</p> <p>Area 19B and 20A - Ware North and East - Land to the north of Ware/Land east of Ware (Info from ATLAS developer responses -</p>	

					Sworders)
Area 20	Ware East Sub-Area A	05/020 and 44/005 (Part – see also Area 19 Sub-Area B above)	Land east of Ware	Sworders	Area 20A - Ware East - Land east of Ware (Questionnaire)  See also ATLAS Meeting Notes and additional info submitted by Sworders to ATLAS

**East of Welwyn Garden City**

**Map of East of Welwyn Garden City**

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
Area 61	East of Welwyn Garden City	26/003	Birchall Farm	David Lock Associates	Area 61 - East of Welwyn Garden City - Birchall Farm (Questionnaire)  Area 61 - East of Welwyn Garden City - Birchall Farm (ATLAS Meeting Notes)  Area 61 - East of Welwyn Garden City - Birchall Farm (Info from ATLAS developer responses - David Lock Associates)
		26/004	Hatfield Estate (part)	JB Planning Associates	Area 61 - East of Welwyn Garden City - Hatfield Estate (part) (Questionnaire incl attachments)  Area 61 - East of Welwyn Garden City - Hatfield Estate (part) (Covering letter)

**North of Harlow/Hunsdon Area**

**Map of North of Harlow/Hunsdon Area**

Area of Search	Site	Call for Sites Ref	Site Name	Developer/Agent Name	Submitted Documents
Area 62	North of Harlow Sub-Area A	21/004 (See also Sub-Area B and Area 69 below)	Land north of A414/ Eastwick Road	Quod Planning	Area 62A and B Harlow and Area 69 - Land north of A414/Eastwick Road (Questionnaire)  Area 62A and B Harlow and Area 69

					<p>- Land north of A414/Eastwick Road (Covering letter)</p> <p>Area 62A and B Harlow and Area 69 - Land north of A414/Eastwick Road (Appendix 1)</p> <p>Area 62A and B Harlow and Area 69 - Land north of A414/Eastwick Road (Update letter, Jan 2013)</p> <p>Area 62A and B Harlow and Area 69 - Land north of A414/Eastwick Road (Biodiversity Strategy, Jan 2013)</p> <p>Area 62A and B Harlow and Area 69 - Land north of A414 /Eastwick Road (Transport Strategy, Jan 2013)</p> <p>Area 62A - North of Harlow - Land north of A414/Eastwick Road (ATLAS Meeting Notes)</p>
	North of Harlow Sub-Area B	21/001	Fiddlers Brook Stables, Church Lane	Trustees of G & S Stores Directors Pension Fund	Area 62A and B Harlow and Area 69 - Fiddlers Brook Stables (Questionnaire)
		21/004 (See also Sub-Area A above and Area 69 below)	Land north of A414/ Eastwick Road	Quod Planning	(See Sub-Area A above)
		21/006	Land south of Gilston Park House, Gilston Park	City & Country	Area 62A and B Harlow and Area 69 - South of Gilston Park (Questionnaire)
		27/002	Sayes Park Farm, High Wych Road	Lloyd Williams Chartered Surveyors	Area 62A and B Harlow and Area 69 - Sayes Park Farm (Questionnaire)
		29/004	Eastern part of Briggens Estate	Savills	<p>Area 62A and B Harlow and Area 69 - Eastern part of Briggens Estate (Questionnaire)</p> <p>Area 62A and B Harlow and Area 69 - Eastern part of Briggens Estate (Covering letter)</p> <p>Area 62A and B Harlow and Area 69 - Eastern part of Briggens Estate (Appendix 1: Plan 1)</p> <p>Area 62B - North of Harlow -</p>

					Eastern part of Briggens Estate (ATLAS Meeting Notes)
Area 69	Hunsdon Area	21/004 (See also Area 62 Sub-Areas A and B above)	Land north of A414/ Eastwick Road	Quod Planning	(See Area 62 Sub-Area A above)

This page is intentionally left blank

## East Herts Strategic Sites Deliverability Advice

### Notes on ATLAS role, tasks & general approach

The Advisory Team for Large Applications (ATLAS) has been asked to provide advice and support to assist East Herts District Council (the Council) in progressing their District (Local) Plan. This was confirmed through the District Planning Executive Panel on 25th July (Item 5. Update Paper & Essential reference paper D),

The work that the Council are undertaking to prepare their Plan is complex and involves many themes and workstreams. ATLAS support is not being provided to consider the general approach to plan making, or the robustness of technical aspects of the evidence base. The scope of support has been targeted at the key infrastructure and site deliverability considerations of the largest and most complex potential strategic sites only.

Subsequent to the Panel meeting, a Project Engagement Plan has been set out to establish the operating principles, role and tasks of ATLAS. This includes the following tasks:

- 1 Draw knowledge from comparable projects and experiences, in particular where other Local Authorities have been considering similar issues relating to large scale growth.
- 2 Provide advice on infrastructure deliverability and plan making to help inform the Councils approach to these matters, reflecting upon the current available information and potential requirements of the plan making system.
- 3 Support partners to find ways forward to consider key infrastructure and site deliverability issues. This includes reviewing available information of particular significance and working directly with relevant public and private sector key stakeholders to find ways forward.

ATLAS have undertaken a desk-top review of key information and have been provided with copies of material that was submitted in response to landowner-developer questionnaires issued by the Council in summer 2012. The main objective of this review has been to highlight issues which may be worth further consideration and testing to see if further evidence could be made available to inform decision making, and see if there are opportunities to establish any necessary ways forward. The intention of the review process was not to consider the particular robustness of specific technical material, but to flag areas where there could be scope for greater clarity.

ATLAS made the judgement as to which sites were of value for further consideration through this process and which parties may need to be approached directly for further information. The key criteria influencing this judgement were:

- Sites needed to be of sufficient scale where specific on or off site infrastructure would be required (such as new schools, substantial alterations to on/off site highways, etc);
- Sites that were particularly significant to the actual delivery of such infrastructure either by way of their scale or specific location (such as likely to act as the main access point to the development or likely to be the main funder of any such works);
- Sites fitting the above criteria where the developer submissions were sufficiently detailed to indicate that the promoters may have further information that could assist with decision making; and
- Sites which were not as yet already substantially progressed through live planning applications or ongoing appeals.

## East Herts Strategic Sites Deliverability Advice

### Approach to meetings involving site promoters

Following the review of the developer submissions, ATLAS considered it to be valuable to attempt to seek clarification on certain points and test whether further information could be made available. Of key significance in this process are the specific site promoters, who will ultimately be responsible for bringing forward land and schemes to delivery. Much of the key evidence relating to deliverability relies upon the work and approach of the site promoters and developers concerned.

The promoters will have their own view on what may be considered necessary or appropriate and therefore ATLAS considered it valuable to open a structured dialogue to review and discuss the information that had been made available to date.

As such ATLAS arranged meetings with a small number of developers and promoters, based upon the criteria referred to earlier and consideration of the material made available to date, Where meetings have been held with promoters, they have followed a common format and agenda. This agenda considered the following main items.

- Explanation of the purpose & scope of the ATLAS work;
- Review of landowner aspirations & overview of project status;
- Discussion on plan making, levels of associated evidence and any preferred approach of the promoter concerned;
- Review & discussion on potential key deliverability considerations subject to the context of each site and level of available information. This included matters such as the approach to masterplanning, confirmation of site capacity, extent of collaboration with relevant key parties, proposed programme/build out rates, key infrastructure requirements, project viability & position on planning obligations, approach to delivery;
- Identification of any further information that could be made available to assist decision making.

Notes of each meeting were prepared and made available to the Council. Any subsequent information provided by the promoters in light of the meetings likewise was to be sent over to the Council to support local decision making. There was recognition by all concerned that any such information would be treated transparently and likely to be made publically available.

It is important to recognise that this process has not been exhaustive in terms of reviewing all aspects of the wider evidence base, or requirements of the plan making system related to 'soundness'. However the developer submissions and background discussions with officers at the Council has provided a reasonable starting point to consider the key issues and current position directly with specific promoters. It should therefore be noted that there will undoubtedly be other relevant material and further considerations influencing the position to date. The process undertaken has also been influenced by the amount of time available for site promoters to compile further information and respond.

Of key importance to the process overall is that decision making on the necessity for and robustness of the full evidence base will ultimately be a matter of debate and testing via the next stages of formal plan making, consultation and any subsequent Examination in Public.

The outputs of the ATLAS tasks should therefore be considered within that wider context.