



MEETING : DISTRICT PLANNING EXECUTIVE PANEL
VENUE : COUNCIL CHAMBER, WALLFIELDS, HERTFORD
DATE : WEDNESDAY 22 OCTOBER 2014
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

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.)

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AGENDA

1. Apologies

To receive apologies for absence.

2. Chairman's Announcements

3. Minutes (Pages 7 - 18)

To approve the Minutes of the meeting of the Panel held on 17 July 2014.

4. Declarations of Interests

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

5. East Herts Gypsies and Travellers and Travelling Showpeople
Identification of Potential Sites Study, September 2014 (Pages 19 - 174)

Note – This item will include a presentation by the consultants, Peter Brett Associates.

6. Mead Lane Urban Design Framework (Pages 175 - 300)

7. Neighbourhood Planning Guidance Note (Pages 301 - 332)

8. Greater Essex Demographic Forecasts 2012 – 2037 Phase 6 Main Report,
September 2014 (Pages 333 - 362)

9. Delivery Study Update Report (Pages 363 - 406)

10. Duty to Co-operate Update Report (Pages 407 - 426)

11. East Herts Resident Survey on the Draft District Plan, July 2014 (Pages 427 - 462)

12. Draft District Plan Chapters 20-25: Response to Issues Raised During Preferred Options Consultation and Draft Revised Chapters (Pages 463 - 560)

13. Urgent Business

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

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MINUTES OF A MEETING OF THE
DISTRICT PLANNING EXECUTIVE PANEL
HELD IN THE COUNCIL CHAMBER,
WALLFIELDS, HERTFORD ON THURSDAY
17 JULY 2014, AT 7.30 PM

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

ALSO PRESENT:

Councillors W Ashley, E Buckmaster, S Bull,
G Cutting, G Jones, G McAndrew,
M McMullen, T Page, M Pope, P Ruffles,
N Symonds, K Warnell, G Williamson,
M Wood and C Woodward.

OFFICERS IN ATTENDANCE:

Chris Butcher	- Senior Planning Officer
Ripple Gupta	- Planning Officer
Isabelle Haddow	- Planning Officer
Martin Ibrahim	- Democratic Services Team Leader
Lorraine Kirk	- Senior Communications Officer
Kay Mead	- Senior Planning Officer
Martin Paine	- Senior Planning Officer
Laura Pattison	- Assistant Planning Officer
George Pavey	- Assistant Planning/Technical Officer
Jenny Pierce	- Senior Planning Officer
Claire Sime	- Planning Policy

Kevin Steptoe Team Leader
- Head of Planning
and Building
Control Services

ALSO IN ATTENDANCE:

Nigel Moore - Opinion Research
Services

1 **EAST HERTS GYPSIES AND TRAVELLERS AND
TRAVELLING SHOWPEOPLE ACCOMMODATION NEEDS
ASSESSMENT APRIL 2014**

The Panel considered a report presenting the findings of the East Herts Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, April 2014, which made recommendations on the amount of provision necessary for both Gypsies and Travellers and Travelling Showpeople for the period to 2031.

Nigel Moore, Opinion Research Services, gave a presentation on the main findings and responded to various Members' questions. He clarified that the assessment was about identifying needs and not specific sites and whether these needs could be met within the provisions of the emerging District Plan. The next stage would be to undertake the site scoping work that would determine which locations could be selected to meet the identified need. This would be subject to a further report to Members in due course.

Members were advised that this study was confined to identifying needs arising in East Herts only and that issues relating to adjacent sites in neighbouring areas would emerge through both the emerging Identification of Potential Sites Study and through Duty to Co-operate arrangements agreed between Authorities in due course. In respect of stakeholders' comments on site location within the Accommodation Needs Assessment, it was

emphasised that these were personal opinions of respondents and did not represent a policy position.

At this point (8.35 pm), the meeting was adjourned for 5 minutes to enable the technical faults in the microphone system to be addressed. At 8.40 pm, the meeting resumed and the Chairman advised that the webcast had been abandoned as the technical problems could not be resolved.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the East Herts Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, April 2014, be agreed as part of the evidence base to inform and support the East Herts District Plan; and

(B) the East Herts Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, April 2014, be agreed to inform Development Management decisions.

2 DISTRICT PLAN UPDATE REPORT

Consideration was given to a report updating Members on progress with the District Plan and activities undertaken in accordance with the agreed consultation strategy. An updated breakdown of the consultation feedback was also tabled, together with an explanation of the next steps in addressing the issues raised. The Panel also considered the evolving situation in relation to the Duty to Co-Operate and noted a letter from the Planning Minister clarifying interpretation of Green Belt policy. Members were also advised on the next steps towards an amendments consultation for the District Plan.

Cllr C Woodward asked whether Officers were aware of the recent appeal decision in relation to the New Barnfield incinerator proposal, and what the implications of this

were for the treatment of Green Belt through the District Plan. Officers replied that the letter from the former Planning Minister made clear the distinction between planning applications such as New Barnfield and plan-making, where there were a number of examples of Local Planning Authorities reviewing their Green Belt in order to meet their housing needs. If East Herts Council was to refuse to release Green Belt where this addressed the national requirement to promote sustainable patterns of development, this would invite nearby Green Belt constrained Authorities to press the Council to address their unmet needs in the Rural Area beyond the Green Belt. From careful study of the reports and letters of the Planning Inspectorate it was clear that the expectation was that Green Belt constrained Authorities would nevertheless be expected to make every effort to meet their development needs.

Cllr G Cutting asked whether it would be possible to mitigate development pressures at ASR5 by instead developing the brownfield sites in the centre of Bishop's Stortford. Officers explained that given the very high levels of housing need in the town the proposed urban extensions to the town would be needed in addition to the brownfield sites.

Cllr K Warnell expressed concern at the level of response to the District Plan consultation. Officers replied that the level of response was equal to or better than those for comparable recent consultations carried out by other Local Planning Authorities. A comprehensive consultation strategy had been agreed by the Council and implemented with the support of Members, Town and Parish Councils, and Civic Societies.

Cllr C Woodward queried the procedure in relation to feedback submitted to the consultation. Officers explained that a six-point procedure was set out on the front page of the Interim Version 2 of the Consultation Responses report presented at the meeting, and which would be posted to the website. All feedback was being

entered to the Consultation Portal. Officers would then review the feedback to identify all the planning issues arising, before deciding whether any additional technical work would be required to address the issues raised. Depending on the outcomes of this process, some amendments to the Preferred Options plan could be required, and these would be the subject of an amendments consultation later in 2014.

Cllr G Cutting asked why only 12 members of the public had attended the Bishop's Stortford drop-in session. Officers replied that all 20 public meetings had been promoted in the same way, with the main variation being the degree of promotion by Town and Parish Councils. Attendance had averaged around 50 members of the public, with significantly higher levels at a number of events. It was therefore unclear why attendance at the Bishop's Stortford drop-in session was below average.

In response to a question about the need for positive engagement with local communities from Cllr G Cutting, Officers explained that the Council had undertaken all reasonable measures to engage, including the public meetings co-ordinated with a number of Town and Parish Councils and Civic Societies. The programme of engagement went significantly beyond the requirements of the Regulations and the Council's adopted Statement of Community Involvement. Positive engagement needed to be understood not only in relation to the District Council's agreed activities, but also in relation to input from individual Members and other organisations including Town and Parish Councils.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the record of consultation activity, together with the analysis of comments logged, as contained at Essential Reference Papers 'B' and 'C' respectively, be noted; and

(B) explanation of the Duty to Co-Operate, together with the letter from the Planning Minister in relation to Green Belt policy contained at Essential Reference Paper 'D', be noted.

3 DELIVERY STUDY UPDATE REPORT

The Panel considered a report on progress with the Delivery Study, a critical piece of the evidence base for the emerging District Plan. The report also explained the Council's approach to engagement with site promoters (landowners and prospective developers), which would be necessary to ensure that the Council met soundness requirements for Examination in Public.

In response to Members' comments, Officers advised that consultants for undertaking the Study would be appointed shortly and that the timetable had to be robust and realistic.

Cllr G Jones commented that the Delivery Study would be critical to demonstrating that the plan was sound, and asked whether, given the ambitious scope of the work, it was realistic to expect the consultants to report by 10 September as suggested in Paragraph 56 of the specification. Officers replied that the proposed work programme was indeed extremely tight, and that paragraph 57 of the specification asked for an honest assessment of the feasibility of the proposed deadline. This would be taken up with the consultants at the inception meeting.

Cllr G Jones asked whether there could be potential conflicts of interest facing the Delivery Study consultants. Officers replied that given the large number of sites promoted by different developers across the District, and the limited number of consultancy firms competent to undertake work of this nature, there was the possibility of some conflicts. It would be necessary to identify the precise nature of any such conflicts and to ensure that

the consultants avoided working in these specific areas.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the specification for the District Plan Delivery Study contained at Essential Reference Paper ‘B’, be noted; and

(B) the presentations to site promoters and subsequent meeting notes contained at Essential Reference Papers ‘C’ and ‘D’, be noted.

4 **GREATER ESSEX DEMOGRAPHIC FORECASTS 2012 – 2037 PHASE 5 MAIN REPORT – APRIL 2014**

The Panel considered a report setting out the findings of the Greater Essex Demographic Forecasts 2012 - 2037 Phase 5 Main Report technical work, which was intended to form part of the evidence base for generating an appropriate Districtwide housing target for the period 2011 - 2031, and thus inform and support the East Herts District Plan.

Councillor G Jones questioned the use of 2008 household projections which the Government had advised had been replaced by the 2011 projections. He believed that taking an average of both projections overstated the need.

Officers stated that all 9 alternative growth scenarios had been evaluated using both the 2011 and 2008 household projections to provide a range of outcomes that took account of the uncertainties associated with such forecasts. The 2011 based projections were an interim set of data which only covered a 10 year period to 2021. Therefore, they were of limited value for strategic planning purposes in relation to plan periods extending beyond this date. In the absence of a full set of data, Officers had considered it appropriate to have regard to the 2008 based projections which extended beyond 2021.

2012 based population and household projections would be released this year which would form the basis for Phases 6 & 7 of the demographic forecasting work. These forecasts would be considered by the Council in due course. Officers stated that it would be important to keep re-evaluating the objectively assessed need for the District, having regard to the latest household and population projections.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that the Greater Essex Demographic Forecasts 2012 - 2037 Phase 5 technical study, be agreed as part of the evidence base to inform and support the East Herts District Plan.

At this point (9.50 pm), the Panel agreed to extend the meeting beyond 10.00 pm in order to complete the outstanding business on the agenda.

5 **EAST HERTS EMPLOYMENT LAND REVIEW UPDATE 2013**

Consideration was given to a report summarising the findings of the East Herts Employment Land Review Update 2013, which sought agreement to use the Study to inform the preparation of the East Herts District Plan and to inform Development Management decisions.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the Employment Land Review Update 2013, be agreed as part of the evidence base to inform and support the East Herts District Plan; and

(B) the Employment Land Review Update 2013, be agreed to inform Development Management

decisions.

6 **BUNTINGFORD EMPLOYMENT STUDY 2014**

The Panel considered a report summarising the findings of the Employment Study undertaken for Buntingford, which sought agreement to use the Study to inform the preparation of the East Herts District Plan and to inform Development Management decisions.

Councillor S Bull read a statement on behalf of the Town Council, the local Chambers of Commerce and the Civic Society, which suggested that the findings were flawed and that a maximum of only 2 hectares of land should be retained for employment purposes. Officers referred to the range of assumptions within the Study and the need for a robust evidence base.

The Panel supported the recommendation as now detailed.

RECOMMENDED – that the Buntingford Employment Study, June 2014, 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.

7 **STRATEGIC LAND AVAILABILITY ASSESSMENT (SLAA)
ROUND 3 UPDATE REPORT**

The Panel considered an update on the progress of Round 3 of the Strategic Land Availability Assessment (SLAA) technical work that would inform the preparation of the East Herts District Plan and housing trajectory.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the full list of identified sites being assessed through Round 3 of the

SLAA, attached at Essential Reference Paper 'B' of the report submitted, be noted; and

(B) any future call for Sites suggestions be included and assessed as part of the annual monitoring and review of the SLAA.

8 NEIGHBOURHOOD PLANNING UPDATE REPORT

The Panel considered a report which provided an update on Neighbourhood Planning and the roles and responsibilities of the Council under the Neighbourhood Planning (General) Regulations 2012. The report also updated Members on the growing level of interest in Neighbourhood Planning in the District and provided details about the publication of the Bishop's Stortford Neighbourhood Plan for Silverleys and Meads Wards, together with the next steps.

Officers also advised that a request for Neighbourhood Area designation by Ware Town Council had been submitted.

The Panel supported the recommendations as now detailed.

RECOMMENDED – that (A) the roles and responsibilities of the Council in accordance with the Neighbourhood Planning (General) Regulations 2012 and outlined in paragraphs 2.1 to 2.13 of this report submitted be noted; and

(B) the growing level of interest in Neighbourhood Planning in the District, together with the requirement to ensure that this area of work is adequately and appropriately resourced, be noted.

9 CHAIRMAN'S ANNOUNCEMENTS

The Panel Chairman welcomed the press and public to the

meeting and reminded everyone that the meeting was being webcast.

The Chairman referred to recent staffing additions in the Planning Policy team and welcomed Chris Butcher, Ripple Gupta, Isabelle Haddow and George Pavey to their first Panel meeting.

The Chairman also wished to place on record his appreciation for the recently-retired Bryan Thomsett, who had provided over 20 years dedicated service to East Herts.

Finally, the Chairman reminded Members that the next Panel meeting had been scheduled for 4 September 2014.

10 MINUTES

In respect of Minute 35 – Interim Development Strategy Report (January 2014), Cllr C Woodward asked whether a threshold would be reached in relation to the scale of Bishop’s Stortford, and if so, what that threshold was. Officers replied that the A1184/A120 bypass had shaped the development of the town. Whilst it was difficult to provide an exact figure, it was already becoming clear that the town was struggling to meet the entirety of its housing need in the longer term, and for that reason, some of the town’s unmet need was being directed towards the Gilston Area in the period beyond 2021.

RESOLVED – that the Minutes of the Panel meeting held on 16 January 2014, be approved as correct record and signed by the Chairman.

The meeting closed at 10.21 pm

Chairman
Date

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 22 OCTOBER 2014
EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING
AND TRANSPORT

EAST HERTS GYPSIES AND TRAVELLERS AND TRAVELLING
SHOWPEOPLE IDENTIFICATION OF POTENTIAL SITES STUDY,
SEPTEMBER 2014

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents the findings of the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, September 2014, which makes recommendations on the manner in which the identified accommodation needs of Gypsies and Travellers and Travelling Showpeople could be met in the district for the period to 2031.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE: That:</u>	
(A)	the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, September 2014, be supported as part of the evidence base to inform and support the East Herts District Plan; and
(B)	the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, September 2014, be supported to inform Development Management decisions; and
(C)	in light of the potential site options suggested in the Identification of Potential Sites Study, a joint Member/Officer Working Group be established to take forward the requirement to provide sufficient pitches and plots to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople and to formulate an appropriate policy approach.

<u>RECOMMENDATIONS FOR COUNCIL:</u> That:	
(A)	the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, September 2014, be agreed as part of the evidence base to inform and support the East Herts District Plan; and
(B)	the East Herts Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, September 2014, be agreed to inform Development Management decisions; and
(C)	in light of the potential site options suggested in the Identification of Potential Sites Study, a joint Member/Officer Working Group be established to take forward the requirement to provide sufficient pitches and plots to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople and to formulate an appropriate policy approach.

1.0 Background

- 1.1 Local authorities have a legal responsibility to plan for the accommodation needs of the Gypsy and Traveller community. The Housing Act 2004 (Section 225) requires local authorities to consider Gypsy and Traveller sites as part of their Accommodation Assessments and to prepare strategies to meet those needs. In March 2012 the Government, in tandem with the publication of the National Planning Policy Framework, issued its 'Planning policy for traveller sites' document, which sets the overarching policy context for the provision of traveller accommodation (to include both Gypsies and Travellers and Travelling Showpeople).
- 1.2 The guidance requires local planning authorities to "make their own assessment of need for the purposes of planning" (paragraph 4) and that "local planning authorities should [*inter alia*], in producing their Local Plan "identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets" and "identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15". Thus, an onus is placed on the Council to demonstrate that it can both quantify what the accommodation needs of Gypsies and Travellers and Travelling Showpeople will be for the Plan period and identify

locations in which that need can be met, in the same way that it has a duty to meet general housing needs.

- 1.3 Members will recall that, at the District Planning Executive Panel meeting on 17th July 2014, Agenda Item 5 presented the findings of the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, April 2014, which was produced by ORS, consultants engaged on behalf of the Council. The Panel agreed to support this technical work as part of the evidence base to both inform and support the East Herts District Plan, and inform Development Management decisions. The Executive subsequently agreed the recommendations on 5th August.
 - 1.4 Following on the Council's agreement of the assessed needs for Gypsies and Travellers and Travelling Showpeople to 2031 in the ORS study, this report now details the Council's approach to establishing a robust evidence base in respect of work relating to the identification of potential locations where these accommodation needs might be met, through the provisions of District Plan Policy HOU7.
 - 1.5 Peter Brett Associates (PBA), a company with considerable relevant experience in the field, were appointed by the Council to carry out an Identification of Potential Sites Study (IOPS) to suggest locations where the needs identified in the ORS Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment could potentially be met within the district. This report has now been finalised and is discussed below.
 - 1.6 For information in reading the report, it should be noted that accommodation for Gypsies and Travellers is expressed in the form of 'pitches' and for Travelling Showpeople is expressed in the form of 'plots'. 'Sites' contain a number of pitches or plots, which for Travelling Showpeople can also be known as 'yards'.
- 2.0 Report
 - 2.1 To set the context for the current study, it should be noted that this is the second study that has been commissioned by the Council to consider potential locations for meeting the accommodation needs of Gypsies and Travellers in the district. However, it is the first study to take the needs of Travelling Showpeople into account.

- 2.2 The first locational study, completed in 2007, was commissioned on a partnership basis jointly with Broxbourne Borough, North Hertfordshire District, Stevenage Borough, Welwyn Hatfield Borough and Hertfordshire County Councils, and employed consultants, Scott Wilson, who completed the 'Accommodation Needs of Gypsies and Travellers in Northern and Eastern Hertfordshire, Stage Two: Identification of Potential Areas to Accommodate Gypsy and Traveller Pitches In the Study Area Report' in October 2007. That study was carried out in accordance with ODPM Circular 01/2006, which was in force at that time.
- 2.3 As the previous 2006 Northern and Eastern Hertfordshire Gypsy and Traveller Accommodation Assessment had identified a need for the overall study area, but had not distinguished the level of individual need for the five separate local authority areas, the Scott Wilson Study suggested various locations where any pitches assigned to the district via the then emerging East of England Regional Assembly's Single Issue Review Policy could potentially later be met once it had been finalised.
- 2.4 An important issue to note about the former Scott Wilson study is that it was carried out at a time when guidance on meeting the needs of Gypsies and Travellers had only relatively recently been issued, via the provisions of Circular 01/2006. Consequently, as this was an emerging area of study, there was a lack of relevant advice or comparator work regarding how such studies should be undertaken.
- 2.5 Subsequent to the publication of the Scott Wilson study, it became apparent that there was a shortcoming with the approach which had been utilised, in that land availability did not form a part of the sifting criteria for the identification of potential Gypsy and Traveller sites. The significance of this is that, while the study was able to identify potential sustainable locations for site provision, none of the owners of any of the sites suggested for East Herts in the Scott Wilson study (except on existing authorised Gypsy and Traveller sites) were then prepared to make their land available for such a use.
- 2.6 Therefore, while permission has subsequently been granted by the Council for an increase in pitches on existing authorised Gypsy and Traveller sites, none of the other suggested sites could be considered as deliverable options for the Council to consider taking forward for inclusion in any planning policy covering provision of new sites to meet the accommodation

needs of Gypsies and Travellers. Consequently, none of the previously suggested new sites have been taken into account as part of the new study.

- 2.7 Since the Scott Wilson study was produced in 2007, Circular 01/2006 has been revoked and has been replaced by the Government's current guidance on the provision of new sites for Gypsies and Travellers and Travelling Showpeople in 'Planning policy for traveller sites', March 2012 (PPTS).
- 2.8 This document confirms that it is necessary for local planning authorities to "prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities" and "use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions" (paragraph 6). The provisions of PPTS mean that it is vitally important that a robust evidence base should underpin any allocations through Local Plan policies.
- 2.9 In addition to the need to meet the requirement for a rolling five year land supply, another fundamental element of national planning policy is that related to the provision of traveller accommodation in the Green Belt. Policy E is quite specific stating at, paragraph 14, that:

Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

However, in exceptional circumstances only, a limited alteration to the Green Belt boundary can be made to "meet a specific, identified need for a traveller site" through the plan making process. In such a case it should be specifically allocated in the development plan as a traveller site only.

- 2.10 PPTS also contains specific criteria to ensure that, *inter alia*, local planning authorities ensure that traveller sites are sustainable economically, socially and environmentally. PBA have incorporated the provisions of the PPTS guidance into their site assessment criteria. Particularly, they have ensured that the deliverability status of any land was included as a key consideration in all of their assessments, which will ensure that the shortcomings of the previous 2007 study are not repeated.

- 2.11 It should also be noted that, in undertaking the study, PBA have paid due recognition to the provisions of the policy requirements of the National Planning Policy Framework (NPPF) in addition to the provisions of PPTS. In particular, the general approach to identifying appropriate site selection criteria was built upon the premise of establishing whether any site would be available, suitable, and developable (i.e. viable and deliverable).
- 2.12 As part of the development of the study, a workshop was held where invitees included appropriate officers of HCC and East Herts Council, and other key stakeholders including officers from neighbouring authorities, local and national interest groups, and members of the travelling community. The outputs from the workshop have informed the development of the site assessment criteria in the main report.
- 2.13 In sourcing potential sites to assess as part of the study, all existing authorised and unauthorised sites in the district were taken into consideration. A specific Gypsies and Travellers and Travelling Showpeople 'Call for Sites' exercise was also undertaken, whereby all site promoters of land outside settlement boundaries (which did not already benefit from extant planning permission) from the previous general 'Call for Sites' or 'SLAA' process were contacted, along with a search of surplus Council and other public sector land. Additionally, all the proposed draft District Plan allocations involving strategic urban extensions without the benefit of planning permission, and the proposed broad locations were also factored into the assessment.
- 2.14 The study itself was carried out in two stages, with an initial desk based high-level site assessment applying broad criteria, which was honed by the second stage detailed site assessment stage, which also included individual site visits, for all those locations which fulfilled the initial sieving criteria.
- 2.15 These second stage assessments have all been clearly documented in the appendices to the report, so the reasons supporting the decisions over whether to carry any individual site forward are clearly apparent.
- 2.16 A full copy of the East Herts Identification of Potential Sites Study is attached to this report at **Essential Reference Paper 'B'**.
- 2.17 At the Panel meeting Members will have the benefit of the key findings of the study being presented to them by the consultants.

This will then be followed by an opportunity for Members to field questions if they so wish.

Key Findings

2.18 Before discussing the key findings of the Identification of Potential Sites Study, it is appropriate at this stage to provide a brief summary of the conclusions which were reached in respect of the requirements for pitches and plots for to be met in the district across the Plan period in the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment (ANA).

2.19 The table below (taken from Figure 9 of the ANA) illustrates the requirement for additional pitch provision across the Plan period for Gypsies and Travellers:

Extra Pitch Provision in East Hertfordshire in 5 Year Periods

	2013-2018	2018-2023	2023-2028	2029-2031	Total
Total	7	1	2	2	12

2.20 For Travelling Showpeople, the table below (taken from Figure 11 of the ANA) illustrates the findings of the study in relation to the requirement for extra plot provision across the Plan period:

Extra Plot Provision in East Hertfordshire in 5 Year Periods

	2013-2018	2018-2023	2023-2028	2029-2031	Total
Total	1	1	2	1	5

2.21 From both the NPPF and PPTS perspective, it is important to note that the Council must demonstrate a five year land supply of pitches and plots through the identification of 'specific deliverable sites' to meet its needs. Beyond the first five years, it has to identify 'a supply of specific developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15'.

2.22 While the overall levels of need for both Gypsies and Travellers and Travelling Showpeople over the Plan period are not considered to be high, the conclusions of the IOPS are that, despite best endeavours, it has not been possible to identify a sufficient five year land supply in locations beyond the Green Belt to meet the accommodation needs of either group.

- 2.23 In terms of Gypsies and Travellers, the report states that there is potential for one pitch to be provided beyond the Green Belt by granting permission at the existing unauthorised site in Throcking. This site has previously been the subject of a planning application for a mobile home and touring caravan with replacement stable block and hard standing, which was dismissed at appeal. The IOPS recognises the issues which caused the previous application to be unsuccessful, and therefore recommends that, if selected, the site should not be granted permission for a static unit, but rather should be limited to a single touring caravan. This could potentially be used to meet the need of one of the seven pitches required in the first five years.
- 2.24 For locations to meet the needs of either Gypsies and Travellers or Travelling Showpeople, the only potential non-Green Belt option identified in the IOPS would involve the provision of pitches as part of development proposals for land to the south of Buntingford. This location, which was formerly used as the Sainsbury's Distribution Depot, features under Policy BUNT2 in the draft District Plan. However, this site has not been made available by its promoters for Gypsy and Traveller use and is currently the subject of a planning application (undetermined at the time of writing) for a scheme comprising mixed use development. Should that scheme not progress then, subject to masterplanning and viability testing, pitches for Gypsies and Travellers or plots for Travelling Showpeople would potentially only be likely to be made available as part of the development via a Policy requirement or, alternatively, through a S.106 agreement if another scheme were to be submitted.
- 2.25 Two other options are suggested in the IOPS to meet the immediate five year land supply, but both would involve the release of Green Belt land, which in national policy terms should only be considered in exceptional circumstances. The first Green Belt suggestion is that, subject to masterplanning and viability testing, pitches for Gypsies and Travellers or plots for Travelling Showpeople could be made available as part of the development of the proposed allocated sites that would be constructed in the first phase of the Plan period (see relevant sites in table 6.9). Again, none of these sites have been made available by their promoters for Gypsy and Traveller or Travelling Showpeople use, and it is anticipated that there could be resistance to any requests for such provision. Therefore, unless S.106 agreements could be achieved, potentially this option would only be likely to be achievable via a Policy requirement (the precedent for this has

already been set elsewhere in the country, notably at Teignbridge District Council).

- 2.26 However, it should be noted that development of sites for Gypsies and Travellers or Travelling Showpeople in the proposed allocated sites or broad locations would have a knock-on effect in terms of general housing numbers. This is because the land-take required for Gypsies and Travellers or Travelling Showpeople's accommodation and associated buffering between settled and travelling communities would reduce the amount of land available for other housing to be provided on those sites. This could have the potential to impact negatively on the delivery trajectory.
- 2.27 In respect of the viability of providing accommodation for Gypsies and Travellers or Travelling Showpeople in these locations, the Council is currently awaiting the outcome of the District Plan Delivery Study, which is being undertaken by the same company of consultants, Peter Brett Associates, which carried out the IOPS. One of the issues to be addressed in the study as part of the overall commission is to 'Advise on the impact of potential impact of different land uses including gypsy and traveller sites on site-specific viability' (Task 4d, paragraph 40). The outcome will therefore need to be taken into account to influence Council's decisions in relation to influencing the formulation of Policy HOU7 in due course.
- 2.28 A second Green Belt option to meet the initial five year land supply would involve allocating a site for the accommodation for Gypsies and Travellers only on part of the existing unauthorised site at Esbies, Sawbridgeworth. This site has a long history of enforcement appeals, the latest being dismissed by the Secretary of State in 2013, but as the need for six of the seven pitches to be provided in the first five years emanate from this site, this could present an opportunity to meet those needs by consolidating development to the north west corner of the site and remediating the remaining area. However, PBA recognise that this option would require the co-operation of existing landowners and would have financial implications for the Council.
- 2.29 Therefore, in order to fulfil its obligations to meet its initial five year land supply requirements in the district, stark choices will need to be made by the Council.
- 2.30 Looking further ahead to years six to 10 and 11 to 15, the situation is, unfortunately, not good in terms of availability of

suitable developable land beyond the Green Belt, as none at all has been able to be identified through the study.

- 2.31 Within the Green Belt, a site has been identified as offering potential for either Gypsy and Traveller or Travelling Showpeople's accommodation at Water Hall Quarry on the B158 between Hertford and Essendon. While this site is somewhat remote from services and does not perform well in sustainability terms, the promoter has indicated that it is likely to become available as the current quarrying operations on the site cease (likely to be between 2024 and 2028) towards the middle to end of the Plan period.
- 2.32 Other than that potentially available site, then the situation is the same as detailed above for the first five year period, in that it would be a matter for the Council to decide whether or not to bring forward Gypsies and Travellers and Travelling Showpeople provision within the proposed allocated sites and/or broad locations.
- 2.33 Again, should the Esbies site be legalised, there would also be the potential (subject to Green Belt and flooding issues being capable of being mitigated and there being sufficient useable space) to meet the remaining assessed need of five pitches for the rest of the plan period on that site.
- 2.34 It should be noted that, while recognising the potential of two of the existing authorised sites in the district to possibly accommodate additional pitches, the study does not recommend utilising this approach. This is for two separate reasons; firstly, the occupants have articulated that they would only wish to meet the needs of their own families and friends on their own private sites and thus the land would not be available to meet the needs of other groups. Secondly, the potential scope to expand these sites could help meet the needs of the existing families beyond the plan period and thus enable those communities to continue living together.
- 2.35 However, it is important to note that, while this report has up to this point focussed mainly on meeting the accommodation needs of Gypsies and Travellers and Travelling Showpeople who reside in East Herts, due attention must also be paid to the Government's requirements around the Duty to Co-operate. While the above suggested approaches could potentially help meet this district's generated needs, other neighbouring

authorities may also be experiencing difficulties in provision and may seek to engage with this Council to achieve delivery.

2.36 Currently, the situation with neighbouring Hertfordshire authorities is incomplete as they are at different stages in the plan making process and their evidence varies. Individual studies have been undertaken for Stevenage (David Couttie Associates, 2013) and for Welwyn Hatfield (in house, 2012). Broxbourne and North Herts are in the process of having studies completed by consultants on their behalf, but these are not yet published. Essex authorities have recently published a joint 'Gypsy and Traveller and Travelling Show People Accommodation Assessment, July 2014', which was carried out by ORS, the same company who carried out the East Herts Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, April 2014.

2.37 A summary table is attached to this report at **Essential Reference Paper 'C'** and this details the currently known position of the neighbouring authorities. Some of these councils have a higher need than East Herts and also experience similar Green Belt constraints. Therefore, it should be borne in mind that Duty to Co-operate discussions between authorities may influence outcomes in terms of numbers of pitches and plots to be accommodated in the various districts. A consequence of this could be that other authorities could seek to accommodate their own needs elsewhere if they cannot be demonstrated to be met where locally arising and that potentially that may impact on this Council by way of its own identified local needs being supplemented by additional needs that have arisen elsewhere.

2.38 However, given the severe issues facing the Council in its own ability to meet its five year land supply, it is possible that this could be more likely to impact later on in the Plan period.

Other Matters

2.39 On 14th September, the Government issued 'Consultation: planning and travellers'. This document proposes making certain changes to the 'Planning policy for traveller sites' guidance and cancelling several other traveller related guidance documents. The consultation runs for 10 weeks and will close on 23rd November. A separate non-key Executive report will consider the matters raised in the consultation together with the Council's proposed response to it.

2.40 It is important to note that the proposed revisions to the guidance are currently only at the consultation stage and have not been finalised. Therefore, at this stage it is considered that there would be no reason for this to affect the Council's consideration of the Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study.

Next Steps

- 2.41 It is crucial that it can be demonstrated that the accommodation needs of Gypsies and Travellers and Travelling Showpeople across the Plan period are capable of being met within the provisions of the emerging District Plan (draft Policy HOU7). Failure to make proper provision for Gypsies and Travellers and Travelling Showpeople's accommodation needs could render the whole Plan subject to being found unsound at Examination, as has been experienced by various councils elsewhere in the country.
- 2.42 The Council will have difficult choices to make in the near future regarding how demonstrated accommodation needs for Gypsies and Travellers and Travelling Showpeople can be met in the district. It will be necessary in the first instance to ensure that a five year land supply (five pitches and one plot) can be demonstrated, but also that a strategy indicating broad locations for delivery is in place to meet the further needs beyond that time frame (of an additional five pitches and four plots) to the end of the Plan period.
- 2.43 How this is achieved will be a matter for consideration as part of a later report. This will need to take all of the issues raised above into account, including the Duty to Co-operate. Furthermore, none of the proposed allocations and broad locations in the draft District Plan can currently be considered as 'available'; indeed the site promoters have all confirmed the opposite to be the case. However, in the absence of a sufficient supply of land which can be considered as available, suitable and developable (to meet the provisions of the NPPF and PPTS), it may be necessary to require provision in some of these locations through Policy HOU7.
- 2.44 It is anticipated that the re-formed Members' District Plan Policy Discussion Group will help inform decisions over the strategy that the Council will adopt going forward in relation to shaping the contents of Policy HOU7 prior to the amendments consultation.

2.45 In addition to this, because of the complexity attached to this matter, it is recommended that a joint Member/Officer Working Group be established at the earliest opportunity so that the Council may best consider the recommendations made in the Identification of Potential Sites Study and give due consideration to the options presented. The Working Group should also seek to ensure that the Council is able to demonstrate a five year supply in respect of Gypsies and Travellers' pitches and Travelling Showpeople's plots. As part of its remit, any changes to Government policy resulting from the current 'Consultation: planning and travellers', would be taken into account in its considerations.

2.46 Therefore, Members are requested to support the recommendations at the head of this report that the East Herts Identification of Potential Sites Study be supported to form part of the Council's evidence base, both to inform and support the East Herts District Plan, and to inform Development Management decisions, and that a Member/Officer Working Group be established to progress the identification of Gypsies and Travellers' pitches and Travelling Showpeople's plots to meet the five year supply.

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 Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study, Peter Brett Associates, September 2014;
- East Herts Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, ORS, April 2014;
- Consultation: planning and travellers, CLG, September 2014
<https://www.gov.uk/government/consultations/planning-and-travellers-proposed-changes-to-planning-policy-and-guidance>;
- Planning policy for traveller sites, CLG, March 2012.

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

<p>Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):</p>	<p>People – Fair and accessible services for those that use them and opportunities for everyone to contribute</p> <p>This priority focuses on delivering strong services and seeking to enhance the quality of life, health and wellbeing, particularly for those who are vulnerable.</p> <p>Place – Safe and Clean</p> <p>This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p>Prosperity – Improving the economic and social opportunities available to our communities</p> <p>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>
<p>Consultation:</p>	<p>The consultants undertook consultation with relevant parties as part of completing the Identification of Potential Sites Study.</p>
<p>Legal:</p>	<p>The Council has a statutory duty under the provisions of the Housing Act, 2004, to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople and Planning policy for traveller sites requires local authorities to identify and update annually a five year supply of sites against locally set targets.</p>
<p>Financial:</p>	<p>There are no direct financial implications of the study at this stage beyond the cost of its completion.</p>
<p>Human Resource:</p>	<p>None other than that related to project management requirements during the completion of the study.</p>
<p>Risk Management:</p>	<p>Not having an up to date Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study to underpin emerging Policy HOU7 of the draft District Plan would mean that the Council would be likely to have the Plan declared unsound at Examination.</p>
<p>Health and wellbeing – issues and impacts:</p>	<p>The Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study will provide the first stage in ensuring that the locally arising needs of Gypsies and Travellers and Travelling Showpeople can</p>

	be met in the district, which will mean that these communities have suitable permanent accommodation and not have to potentially resort to residing at unauthorised roadside encampments, which could be prejudicial to health and wellbeing.
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Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study




On behalf of **East Herts Council**



Project Ref: 30341/001 | Rev: 03 | Date: September 2014

Document Control Sheet

Project Name: Gypsy, Traveller and Travelling Showpeople Site Identification Study
Project Ref: 30341/001
Report Title: Site Identification Study
Doc Ref: 03
Date: September 2014

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Revision	Date	Description	Prepared	Reviewed	Approved
00	04/06/2014	Draft Report	SJ	PJ	JB
01	20/06/2014	Revised Draft Report	SJ	PJ	JB
02	28/08/2014	Final Draft Report	SJ	PJ	JB
03	05/09/2014	Final Report	SJ	PJ	JB

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Appendix I	Design Templates

1 Introduction and Background

1.1 Introduction

- 1.1.1 East Herts Council (the Council) has appointed Peter Brett Associates LLP (PBA) to provide advice on the delivery of pitches and plots, which will help to identify sites required to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople identified in the Accommodation Needs Assessment (2014) undertaken by Opinion Research Service (ORS). The objective of this study is to identify potential assessment areas and assess potential sites to determine if they are suitable, available and achievable.
- 1.1.2 The results of this study will inform the development of relevant policies and allocations in the emerging District Plan and guide the consideration of future planning applications for Gypsy, Traveller and Travelling Showpeople sites.

1.2 Background

- 1.2.1 Gypsies and Travellers have lived in Britain for at least 500 years and probably longer. For the purposes of the planning system, Gypsies and Travellers means:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependents’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.” (Planning policy for traveller sites, CLG, March 2012).

- 1.2.2 Many Gypsies and Travellers continue to pursue an active itinerant lifestyle and are generally self-employed people. However, increasingly communities are becoming more settled.
- 1.2.3 Gypsies and Travellers are not a uniform homogeneous community, but rather a group of communities which share some features but have their own histories and traditions. Even within each main group there is fragmentation between different families which emphasises the lack of a cohesive community and the need to avoid over generalisations. However, the main cultural groups include:
- Romany Gypsies;
 - Irish Travellers; and
 - New Travellers.

- 1.2.4 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Race Relations Acts.

- 1.2.5 Travelling Showpeople have traditionally been involved in holding fairs and circuses for many hundreds of years. For the purposes of the planning system, Travelling Showpeople means:

“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their family’s or dependent’s more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.” (Planning policy for traveller sites, CLG, March 2012).

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- 1.2.6 The Government published a new policy statement 'Planning policy for traveller sites' in 2012, replacing Circulars 01/2006 and 04/2007 to address future accommodation needs of Gypsies, Travellers and Travelling Showpeople because the previous planning policy arrangements had failed to deliver adequate sites to meet identified needs over the previous 10 years.
 - 1.2.7 Local planning authorities are currently required to identify and allocate sufficient sites to meet the needs of these groups within their local plans (East Herts District Plan). This means that when delivering sites consideration is required to which sites are available and suitable for different types of the travelling community.

2 Existing Sites and Needs

2.1 Introduction

- 2.1.1 'Planning policy for traveller sites' (CLG, March 2012) states that the overarching aim of Government is "to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community." (para 3).
- 2.1.2 The document includes some significant changes to the way in which the site needs of Gypsies, Travellers and Travelling Showpeople are planned for. The most significant change has been the removal of regional targets and the replacement with a new system of locally generated targets. Under this, local planning authorities are required to:
- Use a robust evidence base to establish accommodation needs;
 - Set pitch and plot targets to address the likely permanent and transit site accommodation needs of Travellers in their area;
 - Identify and update annually a supply of specific deliverable sites to provide five years' worth of sites against their locally set targets;
 - Identify a supply of specific developable sites or broad locations for years six to ten and where possible for years 11-15; and
 - Set criteria based policies to meet identified need and/or provide a basis for decisions in case applications nevertheless come forward.
- 2.1.3 The Council commissioned consultants, ORS, to carry out an Accommodation Needs Assessment of Gypsies, Travellers and Travelling Showpeople within East Herts; the objective of that assessment being to quantify the number of Gypsy and Traveller pitches and Travelling Showpeople plots to meet identified needs to 2031. The Study provides evidence to address the first two requirements set out above.
- 2.1.4 The Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study seeks to identify and assess potential sites to meet the needs identified in the Accommodation Needs Assessment. Peter Brett Associates' objective is to provide evidence to support the Council to identify and allocate sites and establish criteria policy in the emerging District Plan.

2.2 Existing sites

Gypsies and Travellers

- 2.2.1 In East Herts there is a need for residential Gypsy and Traveller sites. Residential sites provide residents with a permanent home and can be privately owned, publicly rented for affordable pitches, or privately rented to other Gypsies and Travellers. The size and the amount of facilities available on these sites varies between sites.
- 2.2.2 Sites are made up of a number of caravan pitches and associated facilities. Although there is no national definition of what size a pitch should be, a general guide contained in *Designing Gypsy and Traveller Sites*¹ states that "an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan... drying space for

¹ Communities and Local Government (2008) Designing Gypsy and Traveller Sites Good Practice Guide

clothes, a lockable shed...parking space for two vehicles and a small garden” (para 7.12). On average, usage is approximately 1.7 caravans per pitch.

- 2.2.3 Residential sites provide a permanent home and the amount of facilities on site varies mainly between public and private sites. Public sites will generally have amenity blocks and sometimes play areas and communal spaces. Private site facilities vary enormously depending on the requirements of the residents.
- 2.2.4 In East Herts local authority area there are currently 5 private and occupied Gypsy and Traveller sites, ranging in size from single pitch family sites to one site containing over 20 pitches. There are no publicly owned sites in East Herts.

Table 2.1: Existing Gypsy and Traveller Sites in East Herts

Site No.	Site Name	Settlement	Planning Status	Green Belt location
EH001	The Stables, Bayford Lane	Bayford	Private authorised site	Within Green Belt
EH004	Esbies Estate	Sawbridgeworth	Private unauthorised site	Within Green Belt
EH005	Elmfield Stables	Throcking	Private unauthorised site	Not within Green Belt
EH013	Nine Acres	High Cross	Private authorised site	Not within Green Belt
EH014	Field Green	Levens Green	Private authorised site	Not within Green Belt

- 2.2.5 Three sites have full planning permission and two of the sites are unauthorised.

Travelling Showpeople

- 2.2.6 The needs of Travelling Showpeople are different to Gypsies and Travellers. Their sites often combine residential, storage and maintenance uses. Typically a site contains areas for accommodation, usually caravans and mobile homes, and areas for storing, repairing and maintaining vehicles and fairground equipment. These combined residential and storage sites are known as plots.
- 2.2.7 Although Travelling Showpeople travel for extended periods, they require a permanent base for storage of equipment and for residential use during the winter. These plots (or yards) are also occupied throughout the year, often by older people and families with children, for example. The Showmens Guild ‘Model Standard Package’ which provides model standards and site considerations when developing and planning for Travelling Showpeople sites.
- 2.2.8 In East Herts area there is currently 1 privately owned and occupied Travelling Showpeople’s site. The site represent permanent base for the family which is occupied when they are not travelling for work.

Table 2.2: Existing Travelling Showpeople Site in East Herts

Site No.	Site Name	Settlement	Planning Status	Green Belt location
EH007	Rye House Caravan Park	Rye House, Hoddesdon	Private authorised site	Within the Green Belt

East Herts Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2014

- 2.2.9 A new Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment (ANA) was completed by consultants Opinion Research Services (ORS) for East Herts Council in April 2014.
- 2.2.10 As part of that study, interviews were attempted with every Gypsy and Traveller household in the area who were present during the fieldwork period in January 2014. In total, interviews were achieved on-site with 5 households.
- 2.2.11 The ANA estimates that the extra site provision to meet residential needs between 2014 and 2031, for East Herts, is 12 pitches. The ANA outlines the methodology of how this number was derived.
- 2.2.12 This includes the need of existing households on unauthorised sites, households on the waiting list for a public site and new households likely to occur by 2031 due to household formation. The majority of the pitches will be required for private sites.
- 2.2.13 Interviews were attempted with 100 Showpeople households in the area. Interviews were achieved with 20 Travelling Showpeople. All 20 interviews were carried out with Travelling Showpeople at a yard in Rye House.
- 2.2.14 The estimated extra site provision to meet residential needs for the Travelling Showpeople households between 2014 and 2031 is 5 plots to address the needs of all identifiable households. **Table 2.3** below sets out the ANA need for East Herts in 5 year time periods:

Table 2.3: ANA need for East Herts in 5 year time periods

	2014-2018	2019-2023	2023-2028	2029-2031	Total
Gypsy and Traveller Residential Pitches	7	1	2	2	12
Travelling Showpeople Plots	1	1	2	1	5

- 2.2.15 The ANA does not identify a need for either a public transit site or temporary stopping place within East Herts for either Gypsies and Travellers or Travelling Showpeople.

2.3 Number of Sites Required

- 2.3.1 National evidence would suggest that Gypsies and Travellers prefer small sites containing a small number of pitches to accommodate their immediate family and extended family. Government guidance suggests that “experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of between 3-4 pitches can also be successful, particularly where designed for one extended family” (para 4.7).
- 2.3.2 It is therefore difficult to identify the exact number of sites required to meet the pitch requirements for East Herts. The actual number of sites required will be determined according to a number of factors including taking account of:
- The different cultural, ethnic and family groupings of Gypsies and Travellers;
 - The extent to which additional provision could be made through extension or intensification of existing sites; and
 - Whether replacement sites need to be found for existing sites which may be unsuitable or unsustainable.

- 2.3.3 For Travelling Showpeople, the future need will arise from the occupants of existing yards and is likely to require additional sites.

3 Potential Assessment Areas

3.1 Introduction

- 3.1.1 The study has investigated the potential for the identification of potential assessment areas within East Herts that could be used in conjunction with a criteria policy to guide the subsequent identification or consideration of specific sites through the planning application process.
- 3.1.2 Criteria for defining potential assessment areas have been developed taking account of national and local policy, guidance and identified physical constraints. Potential assessment areas have then been defined taking account of the key criteria.
- 3.1.3 The work has been informed by a stakeholder workshop held on 30 April 2014. Stakeholders included Councils representatives, Gypsy and Traveller support services and representatives from the travelling communities from the East Herts area came together to discuss potentially suitable locations for Gypsy, Traveller and Travelling Showpeople sites, what constitutes a good site and what planning constraints are considered most significant.
- 3.1.4 **Appendix A** – sets out a map defining potential assessment areas for Gypsy and Travellers and Travelling Showpeople. The policy process and consideration of criteria used to define the potential assessment areas is set out below in more detail.

3.2 Policy Background

National policy

- 3.2.1 National planning policy for Gypsies and Travellers is contained within 'Planning policy for traveller sites'². This identifies three key criteria for identifying appropriate sites for delivery through the planning system. To be deliverable within five years or developable within years 6-15, sites should:
- Be suitable – the site should be in a suitable location for development;
 - Be available - the site should be available now or there should be a reasonable prospect that the site is available at the point envisaged;
 - Be achievable – there is a realistic or reasonable prospect that housing could be viably developed at the point envisaged.
- 3.2.2 Local planning authorities should identify sufficient deliverable sites to provide five years' worth of sites against their locally set targets. For years 6-10 and, where possible, for years 11-15, they should identify a supply of specific developable sites or broad locations for growth. The study has used the term potential assessment areas instead of broad locations to avoid confusion with the terminology of the Draft East Herts District Plan. The Draft District Plan already uses the term Broad Locations in reference to proposed large scale strategic development sites at East of Welwyn Garden City, North and East of Ware, and the Gilston Area.
- 3.2.3 National policy recommends that criteria based policies should be developed irrespective of whether need is identified or not. If need is identified they should be used to guide land allocations, while if there is no identified need they should provide a basis for determining planning applications which may nevertheless come forward.

² Planning policy for traveller sites, Communities and Local Government, March 2012

- 3.2.4 Criteria “*should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community*” (para. 10). Many previous studies and local plan criteria based policies across the country have used very restrictive criteria which have prevented many reasonable sites from coming forward. This is one of the principal reasons why the Government is no longer relying simply upon criteria based policies to bring forward suitable sites for Gypsies and Travellers, and instead places the focus upon local authorities to identify specific deliverable sites to provide for their identified need.
- 3.2.5 ‘Planning policy for traveller sites’ identifies a series of issues for criteria to address to ensure that traveller sites are sustainable economically, socially and environmentally. Specific policies set out the national approach towards sites in rural areas and the countryside (Policy C), rural exception sites (Policy D), sites in Green Belt (Policy E), mixed planning use sites (Policy F), major development projects (Policy G) and determining planning applications (Policy H).

Local policy

East Herts – local policies

- 3.2.6 East Herts adopted its current Local Plan in 2007. This includes policy HSG 10 ‘Accommodation for Gypsies’ set out below:

Policy HSG 10 Accommodation for Gypsies

(I) This policy applies to proposals for the use of land as a site for gypsy and traveller accommodation. Any permission granted under this policy will be subject to a condition limiting occupation to gypsies and travellers as defined in paragraph 3.17.1.

(II) If the site is not in the Green Belt, a proposal for a gypsy and traveller site will be permitted provided that each of the following criterion is met:

- (a) the site is in a sustainable location in terms of accessibility to existing shops, social, education and health services and potential sources of employment;
- (b) the site is suitable in terms of vehicular access, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage and waste disposal;
- (c) the site is not affected by environmental hazards that may affect the residents’ health or welfare;
- (d) the occupation and use of the site would not cause undue harm to the amenity of local residents by reason of noise, disturbance or loss of privacy;
- (e) the proposal is capable of being visually assimilated into the surrounding landscape without significant adverse effect;
- (f) within nationally recognised designations, the proposal will not compromise the objectives of the designation;
- (g) the proposal respects the scale of the nearest settled community.

(III) In the Green Belt, new gypsy and traveller sites are inappropriate development and in addition to the above criteria will be expected to demonstrate that harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

- 3.2.7 Since then the Council has consulted upon a Draft District Plan. This includes Policy HOU7 ‘Gypsies and Travellers and Showpeople’ set out below:

HOU7 Gypsies and Travellers and Travelling Showpeople

I. To meet the identified need, xx pitches for Gypsies and Travellers and xx plots for Travelling Showpeople will be provided within the District at the following locations:

Dependent on outcome of two shortly to be commissioned studies: Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, and Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study.

To be shown in form of table with phasing.

II. In order to identify exact locations within the areas allocated to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople listed above, and to assess suitability where planning applications are submitted for non-allocated sites, the following criteria should be satisfied:

(a) the site is in a sustainable location in terms of accessibility to existing local services;

(b) the site is suitable in terms of vehicular access to the highway, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage, and waste disposal;

(c) proposals make adequate provision for on site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of pitches proposed;

(d) the proposal is well related to the size and location of the site and respects the scale of the nearest settled community;

(e) the site can be integrated into the local area to allow for successful co-existence between the site and the settled community;

(f) proposals provide for satisfactory residential amenity both within the site and with neighbouring occupiers and thereby do not detrimentally affect the amenity of local residents by reason of on site business activities, noise, disturbance, or loss of privacy;

(g) proposals ensure that the occupation and use of the site would not cause undue harm to the visual amenity and character of the area and should be capable of being assimilated into the surrounding landscape without significant adverse effect;

(h) the site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains;

(i) within nationally recognised designations, proposals would not compromise the objectives of the designation.

III. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for residential provision and the storage and maintenance of equipment. All other proposals for mixed residential and business activities will be assessed on a site specific basis, taking the above criteria into account.

IV. New traveller sites (whether temporary or permanent) in the Green Belt are inappropriate development and will not be approved except in very special circumstances.

V. Any development granted under this policy will be subject to a condition limiting occupation to Gypsies and Travellers or Travelling Showpeople, as appropriate.

VI. Existing authorised sites for Gypsies and Travellers and Travelling Showpeople will

be safeguarded from development which would preclude their continued occupation by these groups, unless acceptable replacement accommodation can be provided or the site is no longer required to meet an identified need.

- 3.2.8 The site assessment criteria have been developed to reflect the adopted Local Plan and draft District Plan policy criteria, relating to Gypsy, Traveller and Travelling Showpeople Sites.

Other policy and guidance

- 3.2.9 Other relevant considerations which should be taken into account include:

- National policy set out within the National Planning Policy Framework; and
- Communities and Local Government (CLG) Best Practice Guidance: Designing Gypsy and Traveller Sites (2008).

- 3.2.10 These policies and guidance have been taken into consideration when developing site criteria and identifying potential assessment areas within East Herts.

3.3 Criteria for Identifying Potential Assessment Areas

- 3.3.1 Taking account of the national and local policy context, detailed discussion at the stakeholder workshop centred around the following themes:

How potential sites relate to spatial strategies

- Settlement hierarchy and the relationship of sites to sustainable settlements
- Access to the road network and major public transport corridors
- Accessibility to key services
- Impact on local infrastructure

Fit with needs

- Location of current site provision
- Pattern of movements through the district
- Needs of different travelling communities

Avoiding physical constraints and protected areas

- Nature conservation designations
- Green Belt
- Landscape considerations
- Historic built environment designations
- Floodplain and areas of high flood risk

Relationship with other land uses

- Co-existence with local communities
- Scale of sites relative to the settled community
- Mixed planning use sites
- Noise and air quality

3.3.2 Having regard to the national and local policy context and following discussions at the stakeholder workshop, the following site criteria for determining potential assessment areas have been identified:

Table 3.1: Criteria for Identifying Potential Assessment Areas

Fit with spatial strategy	<p>Gypsy and Traveller residential sites and Travelling Showpeople sites should, where possible, be located reasonably close to sustainable settlements with a range of local services.</p> <p>If required, Gypsy and Traveller transit sites should be very close to main transport routes, in the southern part of the District.</p> <p>Local infrastructure should be capable of accommodating development.</p>
Fit with identified needs	<p>Gypsy and Traveller residential sites and Travelling Showpeople sites should have good access to local services.</p> <p>New Gypsy and Traveller residential sites should reflect the patterns of emerging needs to avoid the need for long distance travelling. Extensions to existing sites may be appropriate to accommodate future immediate family needs.</p> <p>Any Gypsy and Traveller transit sites should be located along historic transit routes.</p>
Avoiding physical constraints and protected areas	<p>Sites should not be located within an international, national or local nature conservation designation or in a location where it will have a significant effect upon any designation.</p> <p>Sites should not be located within Green Belt except in very special circumstances.</p> <p>Sites should not be located within areas at high risk of flooding which cannot be mitigated.</p> <p>Sites should not be located within historic parks and gardens or scheduled ancient monuments.</p>

3.4 Identifying Potential Assessment Areas

Fit with spatial strategies

- 3.4.1 'Planning policy for traveller sites' (CLG, 2012) states that "local planning authorities should ensure that sites are sustainable economically, socially and environmentally" (para 11).
- 3.4.2 Local planning authorities should strictly limit the provision of sites in the open countryside away from existing settlements or areas allocated in the development plan but can provide for sites in rural areas subject to further considerations (para 23). Where there is a lack of affordable land to meet the needs of the travelling communities, local planning authorities in rural areas should consider allocating small sites specifically for affordable pitches in small rural communities (para 13).
- 3.4.3 Sites should be located so as to provide a settled base that reduces the need for long distance travelling and unauthorised encampment (para 11).

- 3.4.4 The draft District Plan currently states that provision will be made to meet the identified need for pitches and plots. The draft policy also provides assessment criteria for non-allocated sites.
- 3.4.5 At the stakeholder workshop, there was a general support to incorporate sites for the travelling communities within planned urban extensions. However, it was noted that some urban extensions are more advanced than others and, by implication, may be too far advanced to be able to accommodate future sites.
- 3.4.6 At the stakeholder workshop, whilst it was acknowledged that site provision should reflect, in general terms, the pattern of needs, it was agreed that new sites for Gypsies, Travellers and Travelling Showpeople should not be restricted to where existing need arises at the moment. All sustainable settlements should be considered as potential suitable locations for sites.
- 3.4.7 At the stakeholder workshop, it was agreed that sites should be located with a reasonable access to services but views were expressed that due to high property and land prices and the expectations of current landowners in those locations for higher value development, it was unrealistic to expect private residential Gypsy and Traveller sites to come forward within or immediately adjacent to settlements and that a more flexible approach should be taken. It was pointed out that national policy does not preclude development within the countryside.
- 3.4.8 'Planning policy for traveller sites' (CLG, 2012) states that local planning authorities should promote access to appropriate health services and ensure that children can attend school on a regular basis but avoid placing undue pressure on local infrastructure and services (para 11).
- 3.4.9 Local planning authorities should ensure adequate play areas for children (para 24).
- 3.4.10 The adopted East Herts Local Plan 2007 policy HSG10 states that sites should be in a sustainable location and accessible to shops, social, education and health services and potential sources of employment.
- 3.4.11 The draft East Herts District Plan 2014 policy HOU7 states that sites should be in a sustainable location in terms of accessibility to existing local services.
- 3.4.12 The Showmen's Guild of Great Britain has published a Model Standard Package (The Showmen's Guild of Great Britain, 2007) which states that sites should have good vehicular access, suitable for the ingress and egress of large vehicles and should be in close proximity to a good road network. The site should be close to schools and other community facilities.

Fit with needs

- 3.4.13 The current sites are spread across East Herts. The needs of the sites' occupants were taken into account in the work undertaken by Opinion Research Services, which concluded that the extant permissions on the three existing authorised sites would be sufficient to meet the future needs arising from their resident households.
- 3.4.14 There are two unauthorised sites in East Herts, located in Throcking (EH005 Elmfield Stables) and Sawbridgeworth (EH004 Esbies Estate). Both sites are not permitted and form part of the current need figure identified in the ANA. The needs for each site are: 1 pitch from (EH005), and 5 pitches from (EH004).
- 3.4.15 At the workshop held as part of this current study, it was stated that there is a pattern of historic unauthorised encampments around the southern part of East Herts and that this pattern of movement is generally related to visiting existing sites and employment links to London.

- 3.4.16 The existing private Travelling Showpeople's site is located in the south of the District and generally relates to the town of Hoddesdon, which is a town located outside the local authority boundary in the Borough of Broxbourne.
- 3.4.17 At the workshop it was confirmed that the existing spatial pattern reflects a long period of residence for the Gypsy, Traveller and Travelling Showpeople communities within East Herts, because they have lived in the area for a long time.
- 3.4.18 Those who attended the workshop or were visited on survey wish to remain on their current sites, and would like to gain planning permission for pitches on the existing sites.
- 3.4.19 Future residential Gypsy and Traveller site needs are predominantly generated from a combination of achieving pitches for those currently living on unauthorised sites, for family members living on another site or to meet future household growth from existing sites.
- 3.4.20 Stakeholders commented that the easiest and most appropriate way of meeting future needs would be to extend existing sites or to locate new sites in the same general locations. The best location to meet future need is where they are now. New sites should be small, family owned sites located relatively close to local facilities.
- 3.4.21 There is currently no public site provision within East Herts.
- 3.4.22 The needs of Gypsies and Travellers do not stop at local authority boundaries and the delivery for all types of sites (especially public and transit sites) should be explored across these boundaries. There are a number of Gypsy and Traveller sites within neighbouring authorities, which are located close to the East Herts local authority boundary.
- 3.4.23 Areas reported to the workshop as being considered desirable by Gypsies and Travellers are on the eastern edge of Bishop's Stortford and Sawbridgeworth and in the south/west of the district covering Hertford, Ware and Hertford Heath area, which is a good location for London and work. One stakeholder highlighted that there are a number of people on the County Council waiting list for Gypsy and Traveller sites.
- 3.4.24 Stakeholders stated that Travelling Showpeople sites should be relatively large to meet residential and business needs and to meet future family needs. There is only one Travelling Showpeople site in East Herts district and it is quite large with 40 plots.

Avoiding physical constraints and protected areas

- 3.4.25 The National Planning Policy Framework identifies that protection should be given to international, national and locally designated biodiversity and geological conservation sites. Heritage assets of the highest significance, such as Scheduled Monuments, battlefields and historic parks and gardens should also be protected and development at these locations wholly exceptional. The NPPF also states that local planning authorities should give great weight to conserving landscape and scenic beauty, wildlife and cultural heritage in National Parks.
- 3.4.26 'Planning policy for traveller sites' identifies areas at high risk of flooding including functional floodplains should be avoided given the particular vulnerability of caravans.
- 3.4.27 In discussing these issues, the stakeholder group agreed that there are a number of constraints within national policy which identifies such locations as generally inappropriate for built development.
- 3.4.28 For the purposes of defining potential assessment areas, these areas are:
- Areas at high risk of flooding e.g. zones 3a and 3b;

- International, National and Local Environmental Designations, such as Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and other sites of importance for nature conservation such as Sites of Nature Conservation Importance (SNCI);
- Ancient Woodland;
- Historic assets such as Historic Battlefields, Historic parks and gardens and Scheduled Ancient Monuments.

3.4.29 Development in the Green Belt is inappropriate, except in exceptional circumstances. Sites should be found elsewhere before looking within the Green Belt. Green Belt boundaries are currently being reviewed and this should be taken into account.

3.4.30 Other designations, such as listed buildings, conservation area, etc. whilst being a major constraint on development are not absolute constraints, as the acceptability or otherwise of development depends upon a site assessment of impact.

3.5 Recommended Potential Assessment Areas

3.5.1 Taking into consideration the themes and criteria outlined above, potential assessment areas have been identified for the purposes of the identification of specific sites beyond the first 5 years of the plan period and for use in development management decision making. The map at **Appendix A** shows the two potential assessment areas for Gypsy, Traveller and Travelling Showpeople sites.

Residential sites – Gypsy and Traveller sites and Travelling Showpeople sites

3.5.2 The potential assessment areas for residential Gypsy and Traveller and Travelling Showpeople sites is split into a hierarchy at 2 levels (see map in **Appendix A**):

Level 1 – Beyond the Green Belt - Sites beyond of the Green Belt should be looked upon as potentially favourable for the allocation of sites and in granting planning permission for Gypsy, Traveller and Travelling Showpeople use.

Level 2 – Within the Green Belt - If there are not enough sites identified beyond the Green Belt to meet identified need, then suitable sites within the Green Belt should be considered for allocation in the District Plan for Gypsy, Traveller and Travelling Showpeople use.

3.5.3 Green Belt policy is the defining consideration for the potential assessment areas, as it determines the geographical extent of zones 1 and 2. Green Belt is a significant constraint, and in the NPPF it states that development within the Green Belt is 'inappropriate development that should not be approved except in very special circumstances.'

3.5.4 Peter Brett Associates consider that an important distinction needs to be made between the consideration of national policy in a planning application context and its consideration as part of the District Plan preparation. Local Authorities have a statutory requirement to identify sites to meet the locally defined needs for Gypsy, Traveller and Travelling Showpeople and, whilst speculative planning applications for sites in the Green Belt would be considered inappropriate development except in 'very special circumstances', PBA consider that it would not be inappropriate for a Council to identify and allocate a site or sites in the Green Belt through the plan making process as an exceptional circumstance. The clear difference is that the Council has considered all other site options beyond the Green Belt and therefore need (which alone is very unlikely to constitute 'very special circumstances') is combined with evidence of a site's potential suitability (specifically its impact on Green Belt purposes) and the lack of available

and suitable site alternatives in non-Green Belt locations to warrant an exceptional limited alteration to the Green Belt.

- 3.5.5 Green Belt boundaries are currently being reviewed and therefore the need for Gypsy and Traveller and Travelling Showpeople sites may inform the review of the Green Belt, if sites cannot be found beyond the Green Belt. If suitable sites cannot be identified within the most appropriate potential assessment area, the second potential assessment area (within the Green Belt) should be considered.
- 3.5.6 A series of issues then need to be considered. These are set out in the following paragraphs.
- 3.5.7 **Consideration 1** - Within each potential assessment area, the following absolute constraints should be avoided:
- Areas at high risk of flooding e.g. zones 3a and 3b;
 - International, National and Local Environmental Designations, such as Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and other sites of importance for nature conservation such as Sites of Nature Conservation Importance (SNCI);
 - Ancient Woodland;
 - Historic assets such as Historic Battlefields, Historic parks and gardens and Scheduled Ancient Monuments.
- 3.5.8 **Consideration 2** - Within each potential assessment area, proximity to settlements should be a key consideration. An assessment of sites should take into consideration the distance from each site to health, education, welfare services and employment opportunities and if opportunities exist for residents to access public transport services.
- 3.5.9 **Consideration 3** - The identification of further Gypsy, Traveller and Travelling Showpeople residential sites should focus on the potential assessment areas and should take into account where the need arises and the capacity of local infrastructure to determine the most appropriate potential assessment area to commence the site search.

4 Methodology for Site Selection and Assessment

4.1.1 This section sets out the methodology Peter Brett Associates have followed to complete the site assessment study to identify sites to meet Gypsy, Traveller and Travelling Showpeople needs and establish site criteria for planning policy. A methodology has been developed that is driven by national guidance and are confident it will provide what is needed in an efficient fashion. The methodology was informed by the stakeholder workshop and made available for the Council's consideration. All comments received were fully considered before the methodology was finalised and applied to potential sites.

4.2 Source of Sites

4.2.1 PBA and the Council worked together to establish potential sites for assessment. This involved the consideration of a number of sources of sites and initial sieving to remove sites with no potential early in the process. The site search process considered the following sources:

- Authorised sites - All existing Gypsy and Traveller and Travelling Showpeople sites with full, temporary or personal consents or certificates of lawful use, were assessed for intensification and/or expansion of the existing sites and were taken forward to the Stage 1 assessment;
- Unauthorised sites - All existing unauthorised and tolerated sites and encampments were assessed and taken forward to the Stage 1 assessment;
- Call for Sites - All sites promoted for Gypsy and Traveller and/or Travelling Showpeople uses throughout the District Plan Call for Sites exercise were taken forward to the Stage 1 assessment;
- Council owned land – PBA reviewed the GIS layer and undertook an initial sieve of Council owned land removing all unavailable or incidental public land such as public buildings, public open space, active waste facilities and highway verges. PBA included sites agreed with the Council, to be taken forward to the Stage 1 assessment. Hertfordshire County Council confirmed that they had no sites available for PBA to consider for Gypsy, Traveller and Travelling Showpeople use;
- Surplus Public Sector Land: public sector land owned by other public bodies identified by the Council or through the Call for Sites exercise were taken forward to the Stage 1 assessment;
- Sites from the Strategic Land Availability Assessment: Site owners/promoters of sites which were put forward to the SLAA process were contacted by letter to identify if they could potentially be made available for Gypsy and Traveller and/or Travelling Showpeople uses. All positive responses were taken forward to the Stage 1 assessment;
- Strategic urban extensions or new settlements. All potential strategic development opportunities identified by the Council (e.g. proposed site allocations and Broad Locations for Development identified in the draft District Plan) were included within the Stage 1 assessment. Unlike specific sites, strategic sites and broad locations can only be assessed on a high level basis.

4.3 Identifying Criteria for Site Assessment

4.3.1 Based upon the review of available policy, guidance, workshop comments, identified site needs from the emerging Gypsies and Travellers and Travelling Showpeople Accommodation

Needs Assessment (ANA) and physical constraints, site criteria were identified for discussion and agreement with the Council. PBA then used the criteria to assess potential sites. The criteria can also inform future Council policy and subsequently be used to determine planning applications.

- 4.3.2 Account was taken of national policy, as contained within 'Planning policy for traveller sites' (CLG, 2012) and existing and emerging local policy, as contained within the adopted Local Plan and emerging District Plan.
- 4.3.3 Within the overall policy framework, the general approach to identifying appropriate site selection criteria was built upon the national planning policy framework:
- Is the site available?
 - Is the site suitable?
 - Is the site developable, e.g. viable and deliverable?
- 4.3.4 A key consideration, based upon national policy, has been that criteria should be "fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community" (Planning policy for traveller sites, paragraph 10). Criteria should be clear and transparent and unambiguous. Many previous studies and local plan criteria based policies across the country have used very restrictive criteria which have prevented many reasonable sites from coming forward.
- 4.3.5 PBA have taken account of the various criteria from the following sources including:
- National Planning Policy Framework and National Planning Policy Guidance
 - 'Planning policy for traveller sites', CLG, March 2012
 - Adopted and emerging local policies within the Local Plan and Draft District Plan;
 - The Showmen's Guild of Great Britain 'Model Standard Package';
 - 'Designing Gypsy and Traveller Sites', CLG, May 2008; and
 - The views of the travelling communities and key stakeholders identified through the stakeholder workshop.
- 4.3.6 The site criteria were developed and applied in two stages, Stage 1 is set out below.

4.4 Stage 1 Initial Site Assessment

- 4.4.1 **Stage 1** in the assessment process involved a desk top study undertaking the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability.
- 4.4.2 The application of broad suitability criteria sieved out immediately sites which would be likely to fail on the grounds of contravening major constraints such as being within international environmental designations or within the boundaries of scheduled ancient monuments, etc.
- 4.4.3 Availability was identified throughout this study as a key criterion. With regard to existing occupied sites the future availability of the sites to accommodate additional pitches/plots or to expand was discussed with current owners/occupants and the Council.

- 4.4.4 A traffic light approach for the initial **Stage 1** desk top assessment was utilised, identifying where sites do not satisfy criteria in red, where criteria may be capable of being satisfied in yellow, and where criteria are satisfied in green. **Table 4.1** overleaf sets out the **Stage 1** Assessment Matrix.

Table 4.1: Stage 1 Assessment Process

Criteria	Designation/Issue	Red (Sites does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
Flood Zone	Environment Agency Indicative Flood Mapping and SFRA Area at Risk of Flooding	The site is within Flood Zone 3 and not suitable for Gypsy and Traveller use.	The site is affected by Flood Zone 2 requiring further investigation (and application of policy tests).	The site is not affected by identified areas of indicative flood mapping or is located in Flood Zone 1.
Environmental Designations	Special Protection Area RAMSAR Site Site of Special Scientific Interest National Nature Reserve Site of Nature Conservation Importance	The site is covered by an international designation.	The site is within the buffer of an international designation and could therefore have a negative impact. The site is covered by a national or local designation or is within close proximity and could therefore have a negative impact.	The site is not within an international, national or local environmental designation or within its buffer.
Green Belt and Landscape	Green Belt	n/a	The site is within the Green Belt or sensitive landscape and could therefore have a negative impact requiring further investigation.	The site is not located in the Green Belt or sensitive landscape
Contamination or Unstable Land Issues	Land contamination or unstable land issues	The site is located on or adjacent a landfill site or the land is as unstable, and the land has been identified as unsuitable for residential use.	The site is potentially contaminated or unstable and requires further investigation.	There is no known contamination or unstable land issues.
Noise Issues	Noise issues relating to existing land uses or transport corridors	n/a	The site is located adjacent noisy land uses, which requires further investigation.	There are no noisy adjacent land uses and therefore no noise impact on the site.

Criteria	Designation/Issue	Red (Sites does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
Residential Amenity	Location of site in relation to existing dwellings	n/a	The site is adjacent existing dwellings and requires further investigation.	There are no adjacent dwellings and therefore no impact on residential amenity.
Historic Environment	Scheduled Ancient Monument (SAM) Sites of Archaeological Importance Historic Park and Garden Conservation Area Listed building	The site is likely to result in substantial harm to the significance of a Scheduled Monument, Grade I or II* Listed Building, or a Grade I or II* Registered Park and Garden.	The site could result in harm to elements which contribute to the significance of a designated heritage asset, which require further investigation.	The site is unlikely to harm the significance of any designated heritage asset or its setting.
Availability	Promoted sites, public land ownership, etc.	The owner has confirmed that the site is not available, nor is it likely to be available in the future.	Site availability is unknown and requires further investigation.	There is evidence that the landowner is willing to sell or develop the site as a Gypsy and Traveller and/or Travelling Showpeople site. Public owned sites deemed potentially available for Gypsy and Traveller and /or Travelling Showpeople's use.

4.4.5 If sites did not receive a “red” at Stage 1, the site was considered further at Stage 2. Stage 2 involved a more detailed assessment of suitability issues and an examination of developability. Potential capacity and delivery issues were also investigated.

4.5 Stage 2 Detailed Site Assessment

4.5.1 All **Stage 2** sites were visited by the consultant team. PBA are experienced in recording information and assessing sites in a consistent way and PBA recorded site details and surroundings using a standard proforma. All **Stage 2** sites were sent to key District and County Council officers, including highways, and development management, for comment. These comments fed into the **Stage 2** assessment, which involved a more detailed assessment of suitability and an examination of achievability issues. A further examination of availability was also undertaken at this stage.

4.5.2 Further investigations of assessment centred upon:

- **Availability** – landowners were contacted and it was identified whether sites would be made available and any potential legal or ownership constraints;
- **Suitability** – each site was assessed against the agreed criteria which was broadly grouped into policy requirements, physical constraints and potential impacts; and
- **Developability** – potential site constraints needing to be rectified which could affect viability and any potential alternative uses likely to affect deliverability were identified.

4.5.3 **Stage 2 Matrix**, in **Table 4.2**, overleaf provides the details for how sites were assessed relating to suitability, availability and achievability. For each potentially suitable and available site a proforma was completed, providing more detailed information, including a site map. All sites were measured to key services and facilities, to enable the Council to allocate the most sustainable sites in the event that a range of sites be identified for the Council’s consideration.

4.5.4 All issues of potential delivery identified were subject to investigations where possible, with recommendations made regarding how they would be addressed. All sites that were considered suitable, available and developable were subject to an initial broad assessment of the capacity of the site in terms of the number of pitches or plots which could be provided on site. This took account of:

- Size and shape of site and character of the adjoining area;
- ‘Designing Gypsy and Traveller Sites’, CLG, May 2008;
- Relevant planning history; and
- Design templates developed by Peter Brett Associates, as set out in **Appendix I**.

Table 4.2: Application of Site Assessment Criteria

Draft criteria	Stage at which criteria considered	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Availability	Stage 2	Site promoted by landowners, agents or travelling community Public land confirmed as available	Site not available for Gypsy, Traveller or Travelling Showpeople use. There are known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which cannot be resolved. Public land has been identified in another plan / strategy for another use.	There continues to be doubt over whether the site is genuinely available for Gypsy, Traveller or Travelling Showpeople (GTTS) use after further investigations.	There is evidence that the landowner is willing to sell and/or a developer is interested in developing within the timeframe of the District Plan. There are no known legal or ownership problems, such a multiple ownerships, ransom strips, tenancies or operational requirements which are not capable of being overcome within the timeframe of the District Plan. Public site is not identified in a plan or strategy for another use.
Suitability					
Contamination and unstable land	Stage 2 Note: Will be considered at stage 1 if information available	Contaminated Land Unstable Land	Contains an area of unstable or contaminated land that is likely to undermine the site's suitability and achievability.	Could contain unstable or contaminated land that should be subject to further investigation.	Not located on unstable land. Not located on contaminated land.
Topography	Stage 2	Topography	Steep slopes which make the site unsuitable and/or unachievable.	Sloping or undulating land which may require works to achieve a suitable development.	Level or gently sloping site.

Site access and safety	Stage 2	Access Proximity to major roads	Poor access and/or road of poor standard. Likely to be subject to safety issues from surrounding uses incapable of mitigation	Access poor but capable of being improved. Road of adequate or good standard. Likely to be affected by safety issues but this is capable of mitigation.	Adequate or good access off adequate or good standard of road. Not affected by safety issues.
Accessibility to facilities	Stage 2	Access to facilities: GP Surgery Primary School Shop Access to public transport: Bus stop or route Train station	NA	NA	(Actual distances to be measured to facilities).
Potential impacts					
Green Belt and Landscape	Stage 2	Green Belt and Landscape impact and visual containment	Unacceptable impact of site upon Green Belt and/or landscape not capable of mitigation.	Impact capable of mitigation Potential cumulative impact with other identified sites.	No unacceptable impact on Green Belt and or landscape.
Biodiversity / Protected Species / Important hedgerow	Stage 2	Impact on biodiversity resources or known protected species Site of Special Scientific Interest Local Nature Reserve Geological Conservation Review Site Sites of Importance for Nature Conservation	Significant effect and unacceptable impact of site upon ecology or protected species or habitats not capable of mitigation where no overriding public interest.	Impact capable of mitigation. Potential cumulative impact with other identified sites.	No significant effect or unacceptable impact on ecology, protected species or habitats.

Historic environment	Stage 2	Scheduled Ancient Monuments Listed Buildings Historic Parks and Gardens Conservation Areas Heritage assets (local lists)	Significant harm to the significance of a heritage asset not capable of mitigation.	Harm to the significance of a heritage asset but capable of mitigation.	No harm to the significance of a heritage asset.
Water quality	Stage 2	Groundwater Source Protection Zone	Unacceptable risk to the supply and quality of water resources.	Risk to the supply and quality of water resources capable of mitigation.	No risk to the supply and quality of water resources.
Noise	Stage 2	Noise pollution from surrounding uses e.g. road, rail and air transport	Likely to be adversely affected by noise pollution from surrounding uses that could make for an unacceptable residential environment.	Likely to be affected by noise pollution but this is capable of mitigation.	Not affected by noise issues.
Residential amenity (Impact of site on adjoining uses)	Stage 2	Relationship with existing adjacent uses	Close proximity to existing adjacent uses esp. residential properties where any potential impact (light, visual, noise, traffic) on adjoining uses is not reasonably capable of mitigation.	Close proximity to existing adjacent uses esp. residential properties but any potential impact (light, visual, other disturbance) on adjoining uses is capable of mitigation.	Unlikely to adversely affect existing adjoining uses.
Residential amenity (Impact of adjoining uses on site)	Stage 2	Relationship with existing adjacent uses	Close proximity to existing adjacent uses and any potential impact from these uses (light, visual, other disturbance) on the site is not reasonably capable of mitigation.	Close proximity to existing adjacent uses but any potential impact from these uses (light, visual, other disturbance) on the site is capable of mitigation.	Unlikely to be adversely affected by existing adjoining uses.



Developability	Stage 2	Deliverability Viability	Site constraints or ownership issues that are unlikely to be capable of resolution without considerable expense.	Site constraints capable of being overcome but where extent and cost of mitigation are unclear at this stage.	In a location where housing development is contrary to spatial policy. No site constraints needing to be overcome.
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4.5.5 PBA have developed specific recommendations for the Council to take the evidence study forward into the preparation of policy and the identification of site allocations within the emerging District Plan. The recommendations are detailed within the following sections and seek to identify:

- A shortlist of suitable, available and achievable sites to meet identified needs; and
- Identification of site capacity and delivery options for all sites.

5 Site Assessment and Capacity

- 5.1.1 East Herts District Council has commissioned an update of the previous GTAA and subsequent site assessment work to provide an up to date representation of needs and to assist in identifying sites to allocate within the District Plan. Peter Brett Associates' involvement in this process continues the work of the Accommodation Needs Assessment, by ORS, to provide a robust evidence base for Gypsy and Traveller and Travelling Showpeople's sites to inform the emerging District Plan.
- 5.1.2 All sites identified for assessment at **Stage 1**, were as outlined from the source of sites within **para 4.2.1**. This resulted in a total of 32 sites being assessed at **Stage 1**.
- 5.1.3 This included all existing authorised and unauthorised Gypsy and Traveller sites (5 sites) and Travelling Showpeople site (1 site). It also included 10 sites owned by East Herts Council identified by PBA and confirmed by the Council for consideration at **Stage 1**. 9 strategic sites and 3 broad locations identified in the draft District Plan (2014) were assessed at **Stage 1**.
- 5.1.4 As part of the District Plan process, in 2009 the Council commenced a Call for Sites exercise, inviting developers, landowners and businesses to submit sites in the local area that would be available for development over the next 15-20 years, including those potentially available for Gypsy, Traveller and Showpeople accommodation. Of the hundreds of sites submitted to the Council, two were suggested for Gypsy and Traveller sites. One of the sites, which was submitted in 2013, (The Stables), is an existing Gypsy and Traveller site. In summary, the following sites were put forward:
- The Stables, Bayford, Bayford Lane, Hertford (SLA ref 11-003); and
 - The Water Hall Quarry Complex, Lower Hatfield Road, Hertford (SLA ref 26-001).
- 5.1.5 In March 2014, the Council undertook a follow up letter, to all promoters of Call for Sites submissions which were identified as outside existing designated settlement boundaries, to check with landowners as to whether the site could be made potentially available for Gypsy and Travellers and/or Travelling Showpeople use. Following this approach, the following sites were put forward:
- Land north of Molewood Road, Hertford (SLA ref 03-003);
 - Land south of Owles Lane, Buntingford (SLA ref 02/001); and
 - Land at Archers Green (SLA ref 40-022).
- 5.1.6 All sites were mapped onto GIS and put into a sites database. The study therefore includes a long list of 44 sites. A map of the East Herts local authority area is contained at **Appendix B** showing the distribution of sites subject to assessment.

5.2 Capacity

- 5.2.1 In this section a list of sites is identified which are considered to be potentially suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots. All potentially suitable sites have been subject to an initial broad assessment of the number of pitches which could be provided on site. This has taken account, firstly, of:
- Designing Gypsy and Traveller Sites: Good Practice Guide (DCLG, 2008);

- Travelling Showpeople's Sites Model Standard Package (The Showmen's Guild of Great Britain, 2007); and
 - Any relevant planning history.
- 5.2.2 In addition, Peter Brett Associates have developed templates for various forms of Gypsy and Traveller development, including for residential and transit sites. These have been used to inform the theoretical capacity of sites and optimum size and configuration of pitches (or plots) on site. On larger sites a mix of pitch sizes to reflect the needs of different families can be assumed. Relevant design templates are set out in **Appendix I**.
- 5.2.3 Site capacity has also taken account of on-site constraints and the need, where appropriate, for landscaping and other mitigation measures to achieve a suitable development. Providing good quality landscaping and access arrangements have been taken into account. This will result in sufficient access and accommodation space to create a site which Gypsy, Traveller or Travelling Showpeople find attractive. At the same time, sufficient space and landscaping will help to preserve the residential amenity of neighbouring uses. It should be noted that for strategic allocations and broad locations the capacity of sites has not been identified. Capacity will be subject to specific masterplanning and viability testing for each site and therefore has not been identified at this stage.
- 5.2.4 The shortlisted sites have been assessed for their capacity to accommodate residential uses for Gypsy and Traveller sites and mixed residential/commercial uses for Travelling Showpeople.

5.3 Stage 1 Suitability and Availability Matrix

- 5.3.1 The first stage in the assessment process involved the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability.
- 5.3.2 The initial assessment of site suitability and availability is summarised in a matrix, which is set out in **Appendix C**. A traffic light approach has been utilised, to identify where sites do not satisfy criteria in red, where criteria may be capable of being satisfied in yellow and where criteria are satisfied in green.
- 5.3.3 Sites identified as red have not gone forward to be assessed at **Stage 2**. 8 sites were rejected at **Stage 1** and therefore 36 sites were examined further at **Stage 2**.

5.4 Stage 2 Suitability, Availability and Achievability Site Assessments

- 5.4.1 **Stage 2** involved a more detailed assessment of suitability, availability and an examination of achievability issues.
- 5.4.2 **Appendix D** sets out those sites where it is considered there is no potential for further provision and the reasons for this decision. **Appendices E to H** set out the detailed site assessment results for those sites considered potentially suitable, available and achievable for future provision beyond and within the Green Belt.

Potential sites beyond the Green Belt

- 5.4.3 A total of 3 sites located beyond the Green Belt were identified as potentially available and suitable sites to contribute additional pitches towards meeting future identified needs for Gypsies and, Travellers. It should be noted that whilst suitable and available both Nine Acres (EH013) and Field Farm (EH014) have existing permissions which are sufficient to meet the

needs of the families on the sites until the end of the Plan period in 2031. Both sites have additional capacity which is not required for their own needs within the Plan period and neither wish to make the potential capacity available to meet the wider District need. Therefore these represent potential options for delivery to meet generated needs of those sites beyond the plan period. Results are set out in **Table 5.1** below.

Table 5.1: Sites with Potential beyond the Green Belt for Gypsies and Travellers in East Herts

Site No.	Site Name	Settlement	Existing Provision (including any unimplemented permissions)	Further Capacity	Use
EH005	Elmfield Stables	Throcking	0	1	Gypsy and Traveller
EH013	Nine Acres	High Cross	6	2*	Gypsy and Traveller
EH014	Field Farm	Levens Green	6	1*	Gypsy and Traveller

*these pitches would meet the needs of the site beyond the period of the District Plan

- 5.4.4 It should be noted that Elmfield Stables (EH005) is only recommended for a single touring caravan and is not considered suitable for static caravan provision. Further details on potential sites are set out in **Appendix E** and considered in **Section 6**.

Potential sites within the Green Belt

- 5.4.5 A total of 2 sites within the Green Belt were identified as potentially available and suitable sites to contribute additional pitches or plots towards meeting future identified needs for Gypsy, Traveller and Travelling Showpeople subject to insufficient non Green Belt sites being identified. Results are set out below:

Table 5.2: Sites with Potential within the Green Belt for Gypsy and Traveller and/or Travelling Showpeople use

Site No.	Site Name	Settlement	Existing Provision (including any unimplemented permissions)	Further Capacity	Potential Use
EH001	The Stables	Bayford	8	2 [#]	Gypsy and Traveller
EH002*	Water Hall Quarry Complex	Letty Green	0	15	Gypsy and Traveller or Travelling Showpeople

these pitches would meet the needs of the site beyond the period of the District Plan

*Site EH002 is identified as suitable for both Gypsy and Traveller and Travelling Showpeople use, but could only be developed for one of the uses.

- 5.4.6 All the shortlisted sites have been assessed for their potential capacity. The results are set out in **Appendix F** and considered in **Section 6**.
- 5.4.7 Esbies Estate (EH004) has not been recommended as an available and suitable site with potential for pitches within the Green Belt within this study. This is primarily due to the unacceptable impact the site has on the Green Belt along the River Stort corridor. Careful consideration has been given to use of the site and the possible lawful fall-back uses of certain plots to seasonal leisure touring caravan use. It is concluded that residential use for Gypsy and Traveller pitches would still represent an increase in impact due to the year round and permanent nature of static caravan provision.

- 5.4.8 However, Peter Brett Associates recommend that the Council should give Esbies Estate (EH004) further consideration from a pragmatic perspective. Currently, whilst unauthorised, the site exists and a practical way forward may be to consolidate use for Gypsy and Traveller on plots in the North West Corner, away from potential flood risk areas, This combined with the restoration of the remainder of the site turning it back to open countryside, would result in a significant improvement to the integrity of the Green Belt in this location. This issue is considered further in **Section 6**.

Assessment of Strategic Locations

- 5.4.9 A total of 9 strategic locations have been assessed. These included all sites proposed as allocations in the Draft District Plan which either do not have an extant planning permission attached to them or do not lie within existing urban area boundaries. None of the assessed sites were identified by their promoters as being available for Gypsy, Traveller or Travelling Showpeople use **Table 5.3** sets out the potential locations which were assessed:

Table 5.3: Assessment of Strategic Locations for potential Gypsy and Traveller or Travelling Showpeople Use

Site No.	Site Name (with draft District Plan Policy No.)	Settlement	Use
EH034	Land South of Buntingford (BUNT2)	Buntingford	Gypsy and Traveller or Travelling Showpeople
EH037	Land East of Manor Links (BISH6)	Bishop's Stortford	Gypsy and Traveller or Travelling Showpeople
EH038	Land South of Bishops Stortford (BISH7)	Bishop's Stortford	Gypsy and Traveller or Travelling Showpeople
EH039	Land North of West Road (West of Sawbridgeworth) (SAWB2)	Sawbridgeworth	Gypsy and Traveller
EH040	Land South of West Road (West of Sawbridgeworth) (SAWB3)	Sawbridgeworth	Gypsy and Traveller
EH043	North of Hertford (HERT4)	Hertford	Gypsy and Traveller only
EH044	South of Hertford (HERT5)	Hertford	Gypsy and Traveller
EH045	West of Hertford (HERT3) (South of Welwyn Road)	Hertford	Gypsy and Traveller or Travelling Showpeople
EH051	West of Hertford (HERT3) (North of Welwyn Road)	Hertford	Gypsy and Traveller or Travelling Showpeople

- 5.4.10 Strategic sites were identified as being potentially suitable, subject to masterplanning and viability testing for each site, and could provide the Council with an opportunity to make provision for Gypsy, Traveller or Travelling Showpeople as part of the policy requirements for development in the Draft District Plan. Potentially suitable strategic sites are included in **Tables 6.7** and **6.9** below. Assessments were made of all the locations in **Table 5.3** and these are included at **Appendix G**.

Assessment of Broad Locations

- 5.4.11 A total of 3 broad locations have been assessed. None of the sites were identified as available for Gypsy, Traveller or Travelling Showpeople use. However, all sites were identified as potentially suitable, subject to masterplanning and viability testing for each site. These provide the Council with an opportunity to make provision for Gypsy, Traveller or Travelling Showpeople a part of the policy requirements for development in the Draft District Plan.

Table 5.4: Assessment of Broad Locations for potential Gypsy and Traveller Use or Travelling Showpeople

Site No.	Site Name	Settlement	Use
EH053	Land in the Gilston Area (GA1)	Gilston	Gypsy and Traveller and Travelling Showpeople
EH054	Land North and East of Ware (WARE3)	Ware	Gypsy and Traveller and Travelling Showpeople
EH055	Land East of Welwyn Garden City (EWEL1)	Near Welwyn Garden City	Gypsy and Traveller and Travelling Showpeople

5.4.12 All potentially suitable strategic sites and broad locations are considered further in **section 6**.

6 Recommendations and Delivery Options

6.1 Pitch and Plot Targets

- 6.1.1 'Planning policy for traveller sites' (CLG, 2012) requires local planning authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, to meet likely permanent and transit site accommodation needs arising in each area.
- 6.1.2 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (ANA), completed by ORS in 2014 details the total identified need for new permanent residential Gypsy and Traveller pitches and Travelling Showpeople plots to meet residential needs between 2014 and 2031 to address the needs of all identifiable households in East Herts. The results are set out in **Table 6.1** below:

Table 6.1: ANA need for East Herts in 5 year time periods

	2014-2018	2019-2023	2024-2028	2029-2031	Total
Gypsy and Traveller Residential Pitches	7	1	2	2	12
Travelling Showpeople Plots	1	1	2	1	5

- 6.1.3 The Council is now in a position to include local targets in its emerging District Plan to reflect the pitch and plot targets identified in the study.

6.2 A Supply of Deliverable and Developable Sites

- 6.2.1 In developing the District Plan, 'Planning policy for traveller sites' (CLG, 2012) requires local planning authorities to identify and keep up-to-date a supply of specific deliverable sites sufficient to provide five years' worth of sites against those locally set targets and a supply of specific developable sites or broad locations to meet needs, where possible, for up to 15 years.
- 6.2.2 PBA recommend that to address the requirement to ensure that identified need is met throughout the Plan period, the Council consider the following:
- Safeguarding existing sites (and providing additional pitches/plots where appropriate at those locations);
 - Allocating potential sites beyond the Green Belt;
 - Consider making provision a policy requirement within strategic and/or broad locations beyond the Green Belt; and
 - Consider allocating potential sites or making provision within strategic sites and/or broad locations within the Green Belt (if need cannot be met beyond the Green Belt).

6.3 Safeguarding Existing Sites

- 6.3.1 It is suggested that, as an initial starting point, the Council should consider safeguarding existing Gypsy, Traveller and Travelling Showpeople sites, to ensure that existing needs continue to be met in perpetuity. If sites are lost from these uses, then new replacement sites may need to be found to maintain an adequate supply to meet needs in accordance with the identified pitch and plot targets.

- 6.3.2 There are 3 existing Gypsy and Traveller sites with full permission within East Herts. It is recommended that these sites are safeguarded in the Draft District Plan to ensure their continued use.

Table 6.2: Safeguarding Existing Authorised Gypsy and Traveller Sites in East Herts

Site ref	Site name	Settlement	Existing Provision (including extant permissions)
EH001	The Stables	Bayford	8 pitches
EH013	Nine Acres	High Cross	6 pitches
EH014	Field Green	Levens Green	6 pitches

- 6.3.3 There is 1 existing Travelling Showpeople site with full permission within East Herts. It is recommended that this site is also safeguarded in the Draft District Plan to ensure its continued use.

Table 6.3: Safeguarding Existing Authorised Travelling Showpeople Sites in East Herts

Site ref	Site name	Settlement	Existing Provision
EH007	Rye House Caravan Park	Rye House, Hoddesdon	40 plots

- 6.3.4 From site survey it is clear that these sites are currently in use and are occupied. There appear to be no reasons on the grounds of need why these sites should not be safeguarded in the East Herts District Plan. Safeguarding these sites will prevent their loss to other uses and therefore ensure that new site provision is only required to meet future needs.

6.4 Site Delivery Options

- 6.4.1 A number of potential delivery models have been identified and considered for the potentially suitable sites and strategic/broad locations identified overleaf. These include:
- Delivery model 1: Existing privately owned sites where there is potential for pitches/plots to be created within the existing site boundaries to meet future immediate family needs. Under this model, planning permission would be needed. The Council should consider encouraging planning applications to meet short and medium term needs through entering into dialogue with site occupants.
 - Delivery model 2: Sites which are not currently owned by the travelling communities but have been identified as available for these uses. Allocation in the emerging District Plan could identify these sites to travelling communities and they could be purchased on the open market. Alternatively, the Council could consider using New Homes Bonus or other capital monies to buy the site or identify their own public assets and then make them available to organised groups on a non-profit making basis to enable them to develop and manage. Such groups could also be offered the opportunity to buy stakes in the site, allowing the income from such sales to provide further sites, as appropriate. There are emerging examples of innovative acquisition and funding arrangements across the country.
 - Delivery model 3: New sites where the Council considers that additional affordable pitch provision may be appropriate. In this case, the Council should investigate the potential for either buying sites, developing their public assets or work with other public providers using Government grant funding or other monies to secure or increase affordable provision. Sites could then either be managed by a Council or a Registered Providers (RP's).

- Delivery model 4: Provision required as part of the planning of strategic housing or mixed use development sites/broad locations. There may be opportunity to require suitable strategic allocations/broad locations in the District Plan to provide for Gypsy and Traveller pitches or Travelling Showpeople plots as part of their overall delivery of development in these locations. These could then be either managed by the Council or RPs, sold on the open market, or affordable pitches brought forward. However, it should be noted that masterplanning and viability testing could ultimately result in some sites potentially not progressing to identification for either Gypsy and Traveller or Travelling Showpeople use in Policy HOU7 of the District Plan.

6.5 Sites with Potential (beyond the Green Belt)

- 6.5.1 A total of 1 site has been identified beyond the Green Belt as potentially available and suitable for Gypsies and Travellers. **Table 6.4** sets out the potential site for allocation. Details of this site are contained in **Appendix E**. However, it is important to note that this site would only be suitable for a single touring caravan and would not be suitable for permanent static accommodation.

Table 6.4: Sites with Potential beyond the Green Belt for Gypsy and Traveller Pitches in East Herts

Site Ref	Site Name	Settlement	Existing authorised pitches / plots	Extant permission for pitches / plots	Additional pitches / plots	Plots / Pitches 2014-2018	Plots / Pitches 2019-2031	Delivery option
EH005	Elmfield Stables	Throcking	0	0	1	1	0	Model 1 – private site
TOTAL					1	1	0	

- 6.5.2 The study has identified no sites with potential beyond the Green Belt for Travelling Showpeople.

6.6 Meeting the Needs (beyond the Green Belt)

- 6.6.1 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2014 (ANA) identifies a need for 12 net additional Gypsy and Traveller residential pitches to be developed by 2031. The ANA also identifies a need for 5 additional plots for Travelling Showpeople in East Herts by 2031.

Gypsy and Traveller need and supply beyond the Green Belt

- 6.6.2 **Table 6.5** sets out a summary of need and supply beyond the Green Belt for Gypsy and Traveller sites in East Herts.

Table 6.5: Gypsy and Traveller need and supply beyond the Green Belt in 5 year time periods

	2014-2018	2019-2023	2024-2028	2029-2031	Total
(a) Need for Gypsy and Traveller Residential Pitches	7	1	2	2	12
(b) Existing sites with potential beyond the Green Belt	1	0	0	0	1
(c) New sites with potential beyond the Green Belt	0	0	0	0	0
(d) Total potential supply (b+c)	1	0	0	0	1
(e) Shortfall/Surplus (a-d)	6	1	2	2	11

6.6.3 Peter Brett Associates consider that there is 1 existing currently unauthorised site beyond the Green Belt which may be suitable for one Gypsy and Traveller pitch (albeit for a touring caravan only). Overall this is 11 pitches short of the identified need figure of 12 for 2014-2031. This figure is also 6 pitches short of the identified need which should be delivered in the first 5 years.

Travelling Showpeople need and supply beyond the Green Belt

6.6.4 **Table 6.6** summarises the need and supply beyond the Green Belt for Travelling Showpeople for East Herts:

Table 6.6: Travelling Showpeople need and supply beyond the Green Belt in 5 year time periods

	2014-2018	2019-2023	2024-2028	2029-2031	Total
(a) Need for Travelling Showpeople Plots	1	1	2	1	5
(b) Existing sites with potential beyond the Green Belt	0	0	0	0	0
(c) New sites with potential beyond the Green Belt	0	0	0	0	0
(d) Total potential supply (b+c)	0	0	0	0	0
(e) Shortfall/surplus (a-d)	1	1	2	1	5

6.6.5 Peter Brett Associates have identified no existing or new sites beyond the Green Belt which may be suitable for Travelling Showpeople plots. Overall this is 5 plots short of the identified need figure for 2014-2031. This figure includes the 1 plot of the identified need which should be delivered in the first 5 years.

6.7 Provision via Policy within Strategic Sites beyond the Green Belt

6.7.1 There is the potential to deliver Gypsy and Traveller or Travelling Showpeople uses within the strategic sites/broad locations currently being considered within the draft District Plan. Strategic sites/broad locations have been explored for their potential to provide provision for the travelling community. **Table 6.7** sets out potential strategic site beyond the Green Belt for consideration. It should be noted that a planning application is currently under consideration by the Council for development which does not include Gypsies and Travellers or Travelling Showpeople provision. Should this application be approved, then it is unlikely that a requirement for the provision of accommodation for Gypsies and Travellers or Travelling Showpeople could be secured.

Table 6.7: Strategic Site with Potential beyond the Green Belt for Gypsy, Traveller Pitches or Travelling Showpeople Plots

Site No.	Site Name	Settlement	Phasing
EH034	Land South of Buntingford (BUNT2)	Buntingford	2016-2021

6.7.2 Subject to the outcome of the current application, this strategic site may represent an option beyond the Green Belt for consideration by the Council.

6.8 Delivery options within the Green Belt

6.8.1 It is clear that to meet the overall need for Gypsies and Travellers and Travelling Showpeople, the Council may have to consider sites in the Green Belt. A series of Green Belt options are set out for the Council's consideration, including:

- Sites with potential (within the Green Belt);
- Provision via Policy for Strategic Sites and Broad Locations within the Green Belt;
- Esbies Estate (EH004)

6.9 Sites with Potential (within the Green Belt)

- 6.9.1 A total of 1 site in the Green Belt is identified as potentially available and suitable. Site EH002 is considered suitable for either Gypsy and Traveller or Travelling Showpeople, but would not be immediately available due to on-going quarrying activities on site. As highlighted earlier, sites in the Green Belt are generally considered to be inappropriate and should only be allocated by the Local Planning Authority when insufficient sites in non-Green Belt locations can be identified to meet locally defined needs. **Table 6.8** below sets out the potential sites within the Green Belt.

Table 6.8: Sites with Potential within the Green Belt for Gypsy and Traveller Pitches or Travelling Showpeople Plots

Site Ref	Site Name	Settlement	Existing authorised pitches / plots	Extant permission for pitches / plots	Additional pitches / plots	Plots / Pitches 2014-2018	Plots / Pitches 2019-2031	Delivery option
EH002*	Water Hall Quarry Complex	Letty Green	0	0	15	0	15	Model 2 or 3 – Private or Public Site
TOTAL						15	0	15

*Site (EH002) could be used for either Gypsy and Traveller or Travelling Showpeople use, but not both.

- 6.9.2 It should be noted that site EH002 is potentially suitable for either Gypsy and Traveller or Travelling Showpeople use. Subject to the identified needs the Council could choose to allocate the site for either use, but not both. Details of this site are contained in **Appendix F**.

6.10 Provision via Policy for Strategic Sites or Broad Locations within the Green Belt

- 6.10.1 As set out above, the Council has an option to make the provision of Gypsy and Traveller or Travelling Showpeople uses a policy requirement within strategic sites and broad locations currently being considered within the draft District Plan. Strategic sites/broad locations have been explored within this report for their potential to provide provision for the travelling community. **Table 6.9** sets out potential strategic sites and broad locations within the Green Belt.

Table 6.9: Strategic Sites or Broad Locations with Potential within the Green Belt for Gypsy, Traveller Pitches or Travelling Showpeople Plots

Site No.	Site Name	Settlement	Phasing
EH037	Land East of Manor Links (BISH6)	Bishop's Stortford	2016-2021
EH038	Land South of Bishops Stortford (BISH7)	Bishop's Stortford	2016-2026
EH039	Land North of West Road (West of Sawbridgeworth) (SAWB2)	Sawbridgeworth	2016-2021
EH040	Land South of West Road (West of Sawbridgeworth) (SAWB3)	Sawbridgeworth	2016-2021
EH043	North of Hertford (HERT4)	Hertford	2021-2026
EH045	West of Hertford (HERT3) (South of Welwyn Road)	Hertford	2016-2021
EH051	West of Hertford (HERT3) (North of Welwyn Road)	Hertford	2016-2021
EH053	Land in the Gilston Area (GA1)	Gilston	2021-2031
EH054	Land North and East of Ware (WARE3)	Ware	2021-2031
EH055	Land East of Welwyn Garden City (EWEL1)	Welwyn Garden City	2026-2031

- 6.10.2 PBA included 13 strategic sites/broad locations within the Stage 1 assessment. At Stage 2 PBA contacted promoters/landowners of suitable strategic sites/broad locations regarding the availability of the sites for Gypsy and Traveller or Travelling Showpeople development. Whilst promoters stated that sites are unavailable, which would normally preclude the identification of sites due to an unwilling landowner, PBA consider that the allocation of suitable strategic sites/broad locations for development within the District Plan is the key availability consideration in this instance. Development sites should be allocated to meet all the needs of the Local Planning Authority, including housing, employment, retail and Gypsy, Traveller and Travelling Showpeople sites. Therefore, if the Council has a defined need that is unmet, it would be logical that, subject to masterplanning and viability testing considerations, sufficient strategic sites/broad locations, especially ones beyond the defined urban areas, are identified to meet all needs, including those of the travelling community.
- 6.10.3 Therefore, to meet the identified need, Gypsy and Traveller and Travelling Showpeople sites could be required to be provided within suitable housing sites as part of the policy provisions of the District Plan. A number of authorities around the country are now planning for future Gypsy and Traveller provision through this delivery option (most recently Teignbridge District Council) and it is recommended that the Council work with developers/promoters to ensure that Gypsy, Traveller and Travelling Showpeople uses are appropriately designed into each scheme and effectively delivered within strategic sites/broad locations.
- 6.10.4 This approach would require the Council to work with site promoters to establish if sites could be successfully incorporated within site masterplans and layouts. It would also require the Council to consider the financial impact that provision may have on sites and ensure the viability is considered to determine if strategic sites and broad locations would also be able to deliver other key policy requirements, such as provision of affordable housing. It is therefore recognised that masterplanning and viability testing could ultimately result in some sites potentially not progressing to being identified for either Gypsy and Traveller or Travelling Showpeople use within Policy HOU7 of the District Plan.

6.11 Esbies Estate (EH004)

- 6.11.1 Esbies Estate (EH004) is a currently unauthorised site located on the edge of Sawbridgeworth. The site is located within the Green Belt and is divided into a series of separate plots off the main access road. The site has a complicated planning history and has not been identified by Peter Brett Associates as a suitable site for the Council's consideration. The primary reason for this is the site's location within Green Belt. It is considered that the site would form a valuable part of the Green Belt in this location and performs well in terms of the defined NFFP purposes of the Green Belt. The site effectively forms part of a wider Green corridor along the River Stort.
- 6.11.2 Peter Brett Associates have carefully considered the planning history of the site, particularly the potential lawful fall back uses for several plots to seasonal leisure touring caravan use. Several plots may still have a lawful planning use for seasonal leisure touring caravan use, between April and October, but year round occupation for Gypsy and Traveller use involving the provision of static caravans on the site, would still result in an unacceptable impact on the Green Belt when compared to the potential lawful fall back use.
- 6.11.3 It is, however, considered that, whilst unauthorised the continued presence of the site is undermining the integrity of the Green Belt in this location and this should be addressed, a pragmatic approach may be for the Council to work with existing land owners to consider the rationalisation of provision and the restoration of the remaining site, returning it to open countryside.

- 6.11.4 It is suggested that the most suitable part of the site to be used for Gypsy and Traveller accommodation is the area located in the north west part of the site. This area is located outside areas of potential flood risk (zone 3), and lies adjacent to the built up area. Some of the plots concerned may have lawful fall back use for residential caravans and it is recommended that the views of a planning lawyer may be required to establish a definitive view on the lawful use of sites, as several plots appear to have been used to interim unauthorised uses prior to the unauthorised Gypsy and Traveller use, effectively removing any lawful fall back use.
- 6.11.5 PBA consider that this potential option will require the co-operation of existing landowners and is likely to have financial implications for the Council in terms of legal work and remediation costs that would be required to rationalise the site and restore the remainder of the site to open countryside. This option is considered to offer a number of benefits for the Council, including:
- Allowing the authority to meet its statutory duty, to identify sites (especially within the first five years) and support the adoption of a sound District Plan;
 - Potentially reduced costs compared with the cost of enforcement, eviction/land purchase and restoration, which are likely to be incurred if the existing unauthorised site is to be removed entirely.

6.12 Delivery and Distribution of Sites

- 6.12.1 It is recommended that the Council should use a priority approach to safeguarding and allocation of potentially suitable sites. PBA recommend that the Council meets the need for Gypsy, Traveller and Travelling Showpeople provision in the following order:
- I. Safeguard existing sites to prevent their loss to other uses and increase the identified pitch/plot requirement for the District;
 - II. Allocate new sites and/or provision as part of strategic sites/broad locations (beyond the Green Belt);
 - III. Allocate provision as part of strategic sites/broad locations (within the Green Belt).
 - IV. Allocate existing sites for intensification within the Green Belt (within existing permitted boundaries); and
 - V. Allocate new sites within the Green Belt.
- 6.12.2 It is recommended that the Council strives to provide suitable new sites and sites within strategic sites/broad locations (beyond the Green Belt) for new Gypsy, Traveller and Travelling Showpeople provision in the first instance.
- 6.12.3 Peter Brett Associates consider that the distribution and delivery of provision across the District are important and therefore the selection of site options by the Council should also be guided by the following principles;
- **Fit with needs:** e.g. location of current needs, existing provision and needs of different travelling communities;
 - **Viability and timing of delivery of sites:** e.g. financial viability, provision of other policy requirements such as affordable housing and delivery within the first 5 years.
 - **How potential sites relate to spatial strategies:** e.g. settlement hierarchy, relationship of sites to sustainable settlements and accessibility to key services;

- 6.12.4 The fit with needs is an important consideration and, unlike the housing market, the small scale of need and supply can in some instances require the consideration of the needs of specific families and the appropriate form and location of provision to meet those needs. PBA are aware of Local Authorities where specific needs remain unmet, whilst sites remain vacant because the sites provided are inappropriate to meet specific needs. Peter Brett Associates recommend that the provision of pitches and plots for Gypsies and Travellers and Travelling Showpeople sites should be managed to ensure a good fit with identified need and enable delivery.
- 6.12.5 Viability, capacity and delivery of sites, especially strategic sites/broad locations is a critical consideration for the Council. The study has been unable to identify sufficient specific sites beyond the Green Belt and the Council may be reliant on provision as part of strategic sites/broad locations to meet needs in the first 5 years and beyond. Delivery of provision as part of these sites will need careful consideration to determine capacity and ensure that both site viability and implementation of Council policy, such as affordable housing or code for sustainable homes requirements are not undermined. Moreover, it is noted that none of the proposed allocated sites or broad locations can currently be considered as having 'available' status and therefore a policy requirement in the District Plan would need to be introduced to ensure delivery in particular areas.
- 6.12.6 In meeting the 5 year requirements, the Council will need sites phased for delivery over the 2016-2021 period to bring forward the Gypsy, Traveller and Travelling Showpeople element of the development before 2019 and also to meet longer term needs in the Plan period between 2019 and 2031. This will require further investigation of both viability and delivery to ensure that site options selected by the Council are both viable and deliverable if they are to contribute towards the Council meeting its statutory requirement to identify sufficient sites.
- 6.12.7 The relative accessibility of sites and proximity to the main towns and key services should be considered by the Council when selecting sites. The level of provision for Gypsy and Traveller (12 pitches) and Travelling Showpeople (5 plots) over the plan period is relatively small compared to the level of provision for other uses such as residential, but the Council should still plan for sustainable development where possible.

6.13 Criteria Policy

- 6.13.1 To potentially meet any need later in the plan period (e.g. 5 to 15 years) and to provide a base for considering all planning applications, the District Plan needs to include a criteria policy. Draft Policy HOU7 of the Draft District Plan includes a good criteria policy for assessing planning applications. As explained in the Preferred Options Consultation 2014, the policy needs to be expanded to incorporate targets, as set out in the ANA.
- 6.13.2 Given the extent of the Green Belt in East Herts it is recommend that the Council identifies sufficient sites to meet defined needs over the whole plan period to 2031 rather than relying on the criteria policy to meet needs between 2019-2031. Once adopted the newly defined Green Belt will continue to be a significant constraint to planning applications for Gypsy, Traveller and Travelling Showpeople use on sites that have not been identified and allocated in the District Plan.
- 6.13.3 If the Council were to identify and allocate only a five year supply; e.g. the minimum national policy requirement, they would restrict the remaining provision for plan period to sites beyond the newly defined Green Belt. The risk with this strategy is that unless sites beyond the Green Belt come forward or are identified by the Council in future evidence reviews on this issue then, the Council will be unable to meet requirements to provide sites in the future and could potentially be in a weaker position to deal with unauthorised sites.
- 6.13.4 The National Planning Policy Framework is clear that when defining Green Belt boundaries local Authorities should "satisfy themselves that Green Belt boundaries will not need to be

altered at the end of the development plan period” (NPPF para 84). The NPPF also considers development for Gypsy, Traveller and Travelling Showpeople use in the Green Belt as inappropriate. The Council should therefore consider the allocation of sites and provision within strategic sites/broad locations within the Green Belt in the District Plan to meet the needs over the whole plan period 2014-2031. This would ensure that:

- All the Districts defined needs are addressed in the District Plan;
- The travelling and settled communities would have certainty on the location of future sites;
- The Council would be in a stronger position to deal with unauthorised sites and encampments;
- Provision would have a better fit with the needs and current provision, which is generally located in the southern half of the District (within the Green Belt); and
- Provision would have a better fit with the Council’s spatial strategy which seeks to direct development towards sustainable sites with good access to main towns and key services (which are generally located in the Green Belt).

6.13.5 PBA have amended the Draft Policy HOU7 to reflect the findings the needs assessment and this report, to include:

- Targets for Gypsy and Traveller and Travelling Showpeople uses;
- Allocate potential sites;
- Safeguarding of existing sites;
- Criteria for assessing all Gypsy, Traveller and Travelling Showpeople planning applications.

6.13.6 PBA would also recommend that the Council include a requirement for Gypsy, Traveller and/or Travelling Showpeople use within strategic or Broad Locations. This could be included with in the specific policy for each site or an overall policy for strategic/broad locations.

Revised Policy HOU7 ‘Gypsies and Travellers and Travelling Showpeople’

I. To meet the identified need, **12** pitches for Gypsies and Travellers and **5** plots for Travelling Showpeople will be provided within the District at the following locations:

Site name	Settlement	Provision	Use	Timescale
Elmfield Stables	Throcking	1 pitch	Gypsy and Traveller	2014-2018
Council to insert additional sites to meet needs				

II. The following existing sites for Gypsy, Travellers and Travelling Showpeople, will be safeguarded from development which would preclude their continued occupation by these groups, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need:

Site name	Settlement	Existing Provision	Use
The Stables	Bayford	8 pitches	Gypsy and Traveller
Nine Acres	High Cross	6 pitches	Gypsy and Traveller
Field Green	Levens Green	8 pitches	Gypsy and Traveller
Rye House	Hoddesdon	40 plots	Travelling Showpeople

- III. In order to identify exact locations within the areas allocated to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople listed above, and to assess suitability where planning applications are submitted for non-allocated sites, the following criteria should be satisfied:
- (a) the site is in a sustainable location in terms of accessibility to existing local services;*
 - (b) the site is suitable in terms of vehicular access to the highway, parking, turning and road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage, and waste disposal;*
 - (c) proposals make adequate provision for on-site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of pitches proposed;*
 - (d) the proposal is well related to the size and location of the site and respects the scale of the nearest settled community;*
 - (f) proposals provide for satisfactory residential amenity both within the site and with neighbouring occupiers and thereby do not detrimentally affect the amenity of local residents by reason of on-site business activities, noise, disturbance or loss of privacy;*
 - (g) proposals ensure that the occupation and use of the site would not cause undue harm to the visual amenity and character of the area and should be capable of being assimilated into the surrounding landscape without significant adverse effect;*
 - (h) the site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains;*
 - (i) within nationally recognised designations, proposals would not compromise the objectives of the designation.*
- IV. *Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for residential provision and the storage and maintenance of equipment. All other proposals for mixed residential and business activities will be assessed on a site specific basis, taking the above criteria into account.*
- V. *The New traveller sites (whether temporary or permanent) in the Green Belt are inappropriate development and will not be approved except in very special circumstances.*
- VI. *Any development granted under this policy will be subject to a condition limiting occupation to Gypsies and Travellers or Travelling Showpeople, as appropriate.*
- VII. *All existing authorised sites for Gypsies and Travellers and Travelling Showpeople, will be safeguarded from development which would preclude their continued occupation by these groups, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need.*

6.14 Cross boundary working

- 6.14.1 The Council has a duty to co-operate with adjacent authorities and, given the difficulty identifying sites for Gypsy, Traveller and Travelling Showpeople use across the Country, PBA

would encourage the Council to work with neighbouring local authorities to potentially co-operate on the provision of both Gypsy and Traveller and Travelling Showpeople sites.

- 6.14.2 The needs of Gypsies, Travellers and Travelling Showpeople do not stop at local authority boundaries and the potential for the delivery of all types of sites (especially public sites) should be explored across these boundaries through the Duty to Cooperate, where appropriate. This is particularly pertinent for adjacent authorities that are also constrained by Green Belt.
- 6.14.3 The timing of evidence review is the key consideration for cross boundary working and the production of site assessments to identify specific sites is crucial. East Herts should liaise with adjacent authorities, especially those that have undertaken site work to establish if there are site opportunities that could meet the needs of the travelling community across boundaries. The lack of available opportunities to provide Gypsy and Traveller and Travelling Showpeople's accommodation in East Herts in areas beyond the Green Belt are a material consideration in this respect.
- 6.14.4 The duty to co-operate is not the duty to accept, so the Council will have to be satisfied that adjacent authorities have undertaken robust assessments of both needs and sites to ensure they are not unnecessarily aiding any local authority to avoid providing sites within its own area. Crucially, the very definition of the travelling community, would suggest that this planning use is in fact very cross boundary in nature and Peter Brett Associates would encourage all local authorities to resist the political sensitivities that can prevent the provision of suitable sites.

6.15 Transit Site Provision

- 6.15.1 There are currently no transit sites in East Herts; however, there are two transit sites provided elsewhere in the county, where the police could direct unauthorised encampments, subject to vacancies. There appear to be no major problems relating to unauthorised encampments in East Herts. The Accommodation Needs Assessment (ANA) does not identify a need for future transit provision in the district.

6.16 Funding

- 6.16.1 The Government has identified that it is focusing on incentivising councils to deliver new housing, including traveller sites. 'Planning policy for traveller sites' (CLG, March 2012) identified three potential sources of funding for local authorities:
- 6.16.2 Firstly, the New Homes Bonus scheme which operates in the same way for traveller sites as for other forms of housing. Namely, for every new pitch, a local planning authority will get six years of matched Council Tax funding, with an extra supplement for affordable pitches (such as sites owned or managed by local authorities and Registered Providers).
- 6.16.3 Secondly, the Homes and Communities Agency (HCA) has allocated £1.7bn, as part of its National Affordable Housing Programme for 2015-18, to fund the provision of affordable housing, including traveller sites. The Homes and Communities Agency has launched its prospectus inviting housing associations, councils, developers and others to bid for a share of grant funding for delivery of new affordable housing outside London. Bids will only be accepted for the provision of new traveller pitches and as with other types of accommodation, the Government does not expect to receive bids for schemes on Green Belt land or other land with special environmental protections.
- 6.16.4 A proportion of the £1.7bn funding will be retained for future bids through ongoing Market Engagement. This will allow organisations to take the longer timeframes they need to submit funding bids where schemes had not been fully worked up by 30 April 2014 when the formal bid round closed. The HCA website confirms that bidding for further allocations will reopen for

continuous market engagement in due course. The HCA approach will encourage bidders to bring forward a higher proportion of firm and realistically deliverable schemes at the outset as it will allow them the flexibility to respond to development opportunities as these arise.

- 6.16.5 Thirdly, the introduction of the Community Infrastructure Levy (CIL) could provide a further potential funding source for enabling works required to deliver Council priorities, should the Council choose to introduce a CIL for the East Herts area.

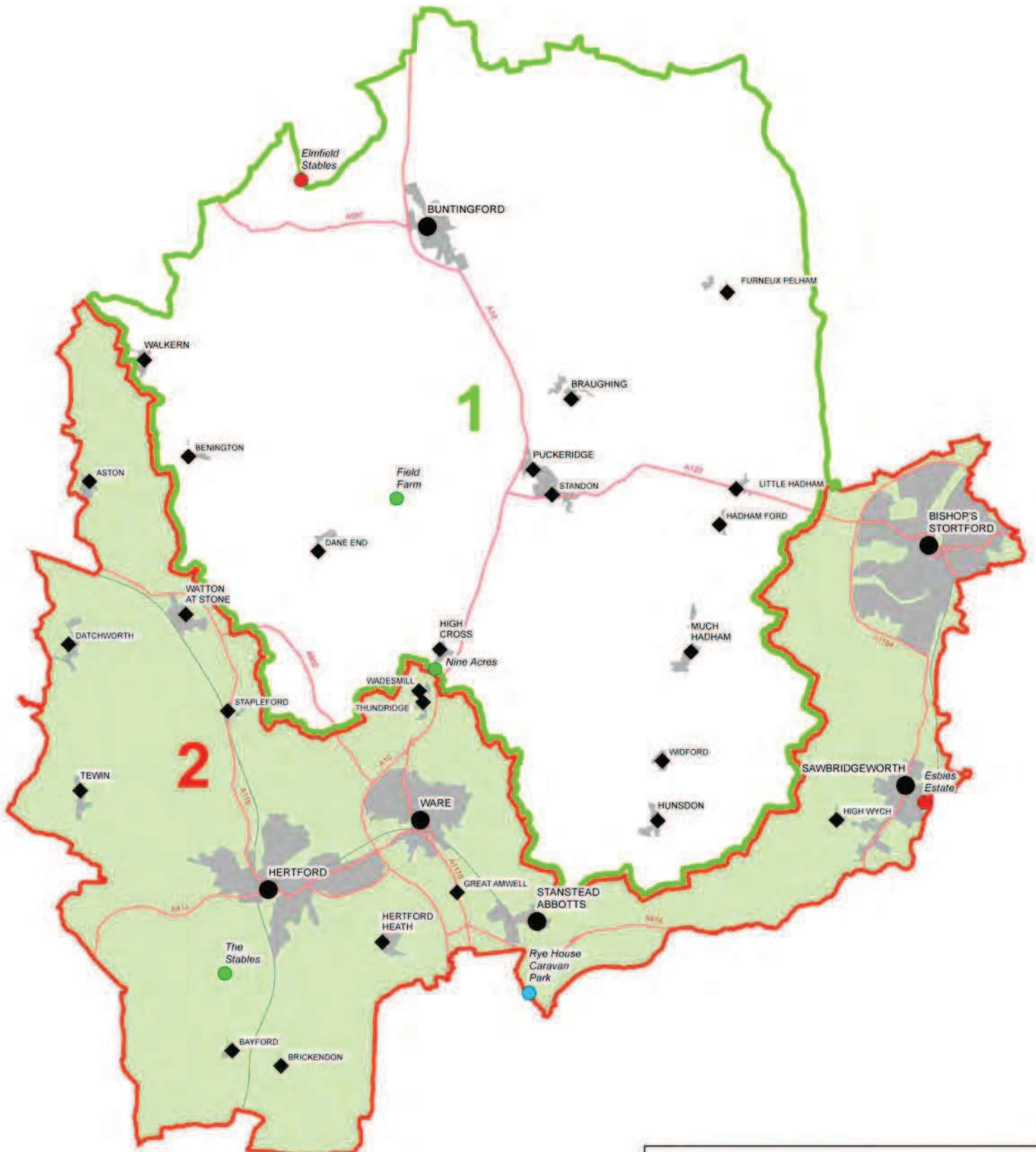
6.17 Delivery and Management

- 6.17.1 As identified at the workshop, it is difficult to find organisations willing to manage public sites in Hertfordshire. The County Council is no longer taking on any new sites and Local Authorities are not currently showing any appetite to manage sites. PBA are also unaware of any Registered Providers managing any sites in the County.
- 6.17.2 There is no affordable public site provision currently in East Herts. There are 140 families on the waiting list for a public site in Hertfordshire. The (ANA) does not specify the need for affordable public provision as all the households identified as being in need in the study are all seeking private sites; however, the Council must remain aware that, should this type of site be required in the future, it should consider putting measures in place to enable public delivery.
- 6.17.3 Riversmead and South Anglia (Circle Group) currently manage all Council housing in East Herts and could be best placed to help deliver and manage sites, working in partnership with the County Council and local authorities. It is recommended that the Council discuss the potential delivery and/or management of Gypsy, Traveller and Travelling Showpeople Sites with these PRs, to determine if this is an option.
- 6.17.4 There is also the potential for the County Council to resume taking on additional public sites, but this would need a co-ordinated and well evidenced support from the local authorities within Hertfordshire to approach the County Council to influence a policy change in this respect.
- 6.17.5 The Homes and Communities Agency (HCA) is also a potential partner to deliver sites. The study has not been made aware of any HCA owned sites within East Herts, but in other Local Authority areas, the HCA works with Councils to deliver new sites.
- 6.17.6 There are also emerging examples within the country of local planning authorities planning for the future provision of sites for travelling communities by allocating urban extension sites for housing and traveller pitches, requiring developers to design and layout serviced pitches/plots for private sale to Gypsies, Travellers or Travelling Showpeople. Where there is a demonstrable need for provision, some local planning authorities are identifying a need for developers to provide pitches/plots or commuted sums as part of the overall benefits package required for new development sites. Peter Brett Associates have worked with Mid Sussex Council, who have specifically set out this requirement in adopted policy for a future urban extension.
- 6.17.7 There are also innovative delivery models being developed in other parts of the country, such as Elim Housing in West of England, which could provide for the funding of initial sites to be recycled to provide for further sites, in the same way as affordable housing has been delivered by housing bodies for some years. For example, the Council could consider using New Homes Bonus or other monies to buy a site or identify their own public assets and then make them available to organised Gypsy and Traveller groups on a non-profit making basis for them to develop and manage. Such groups could also be offered the opportunity to buy stakes in the site, allowing the income from such sales to be recycled to provide further sites.
- 6.17.8 The Council should investigate these sources of funding and delivery options further, in partnership with the Registered Providers and other delivery partners.

6.18 Phasing and Monitoring

- 6.18.1 As with other forms of development, the release of Gypsy, Traveller and Travelling Showpeople sites should be managed to ensure that it corresponds with identified need.
- 6.18.2 The Council could potentially identify sufficient sites to meet needs within the plan period dependant on the outcomes of consideration of options for delivery within the Green Belt. It will be necessary to revisit the identification of sites if sites prove to be undeliverable. Peter Brett Associates suggest that it would be prudent for the Council to identify a potential reserve of sites or extension of existing sites which could be brought forward in the future if required, rather than wait for the need to be established and then start a review of the development plan at that time.
- 6.18.3 Once the Council has identified and allocated enough sites, active monitoring of supply against need on an annual basis, as required by 'Planning policy for traveller sites', would determine the need for any potential release of land to meet future needs. To ensure that it is able to demonstrate that it has an up to date understanding of local needs, the Council should also undertake periodic review of its needs evidence base via an updated Accommodation Needs Assessment.

Appendix A Potential Assessment Areas

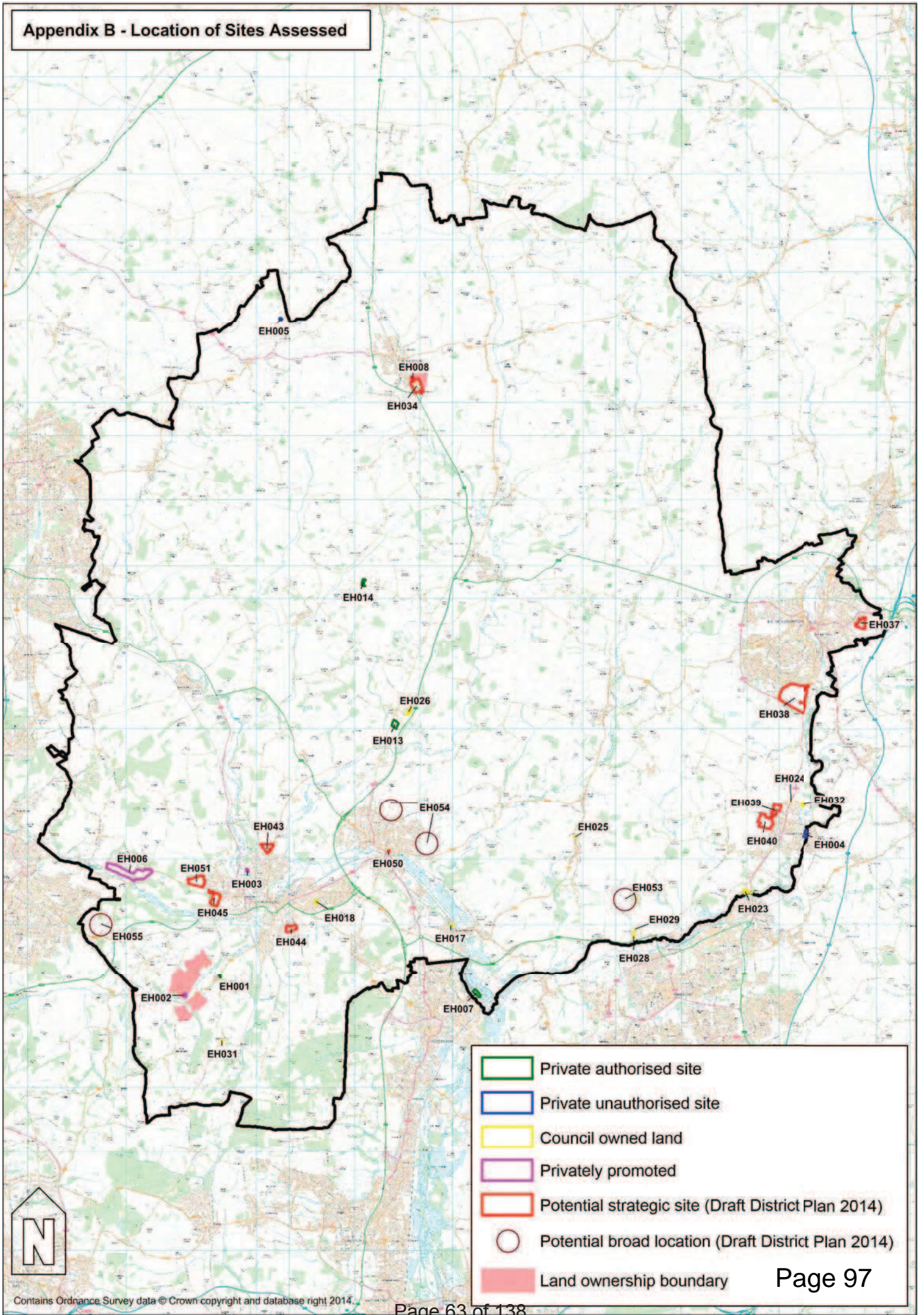


- Encampment - Existing
- Privately Owned & Managed Gypsy and Traveller Site
- Privately Owned & Managed Travelling Showpeople Site
- 2 -Potential Assessment Area
- 3 -Potential Assessment Area
- Green Belt
- Main Settlement
- Village



Appendix B Sites Location Map

Appendix B - Location of Sites Assessed



Appendix C Desktop Assessment Matrix - Stage 1

Site details				Suitability							Availability	Conclusion
Site ref	Site name and address	Site area (ha)	Source	Flood Zone	Environmental Designations	Green Belt and Landscape	Contamination or unstable Land Issues	Noise Issues	Residential Amenity	Historic Environment	Availability for G+T Use	Should the site be considered further?
EH001	The Stables, Bayford Lane, Bayford	0.28	Private authorised site									Yes
EH002	Water Hall Quarry Complex, Letty Green	127.46	Privately promoted									Yes
EH003	Land north of Molewood Road, Hertford	0.47	Privately promoted									Yes
EH004	Esbies Estate, Sawbridgeworth	1.97	Private unauthorised site									Yes
EH005	Elmfield Stables, Throcking	0.30	Private unauthorised site									Yes
EH006	Land at Archers Green	29.37	Privately promoted									Yes
EH007	Rye House Caravan Park	2.40	Private authorised site									No
EH008	Land south of Owles Lane, Buntingford	12.24	Privately promoted									Yes
EH013	Nine Acres, High Cross	3.03	Private authorised site									Yes
EH014	Field Green, Levens Green	1.31	Private authorised site									Yes
EH017	Land at Amwell Lane, Stanstead Abbots	0.2	Council owned land									No
EH018	Land at Braziers Field, Hertford	0.58	Council owned land									Yes
EH023	Harlow Mill, Harlow Road, Harlow	1.07	Council owned land									No
EH024	Land on Cambridge Road, Sawbridgeworth	0.04	Council owned land									No
EH025	Land between 50-52 Widford Road, Ware	0.05	Council owned land									Yes
EH026	Land at Poplar Close, High Cross	0.96	Council owned land									Yes
EH028	Land at Park Cottages, Eastwick	0.28	Council owned land									Yes
EH029	Land adjacent 11 Roseley Cottages, Eastwick	0.07	Council owned land									Yes
EH031	Land to the rear of 4 & 4a Ashendene Road, Bayford	0.12	Council owned land									Yes
EH032	Land east of Reedings Way, Sawbridgeworth	0.92	Council owned land									Yes
EH034	Land South of Buntingford	10.2	Strategic site									Yes
EH037	East of Manor Links, Bishop's Stortford	6.24	Strategic site									Yes
EH038	Land South of Bishops Stortford (Sub Area A)	54.12	Strategic site									Yes
EH039	Land North of West Road (West of Sawbridgeworth)	5.89	Strategic site									Yes
EH040	Land to the south of West Road (West of Sawbridgeworth)	14.13	Strategic site									Yes
EH043	North, Hertford	5.96	Strategic site									Yes
EH044	South, Hertford	4.9	Strategic site									Yes
EH045	West of Hertford (North of Welwyn Road)	8.83	Strategic site									Yes

Site Details				Suitability							Availability	Conclusion
Site ref	Site name and address	Site area (ha)	Source	Flood Zone	Environmental Designations	Green Belt and Landscape	Contamination or unstable Land Issues	Noise Issues	Residential Amenity	Historic Environment	Availability for G+T Use	Should the site be considered further?
EH051	West of Hertford (South of Welwyn	11.88	Strategic site									Yes
EH053	Gilston area	-	Broad location									Yes
EH054	North and East of Ware	-	Broad location									Yes
EH055	East of Welwyn Garden City	-	Broad location									Yes

Appendix D Sites with No Potential - Stage 2

Site ref	Site name	Settlement
EH003	Land North of Molewood Road	Hertford
Site address	Local authority	Size (ha)
	East Herts Council	0.5
Description of site		
<p>The site is a green field which is slightly overgrown and slopes gently from south to north. The site is situated within a rural area on the edge of Hertford, adjacent large residential properties. There is a tree on the right side of the entrance. There is also a historic house located to the south of the site which is located within a Conservation Area. It is located at the end of Molewood Road, a private narrow lane which has a couple of tight corners, and accessed via a residential road.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input checked="" type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
The site was promoted to the Council for development and assessed in the Strategic Land Availability Assessment. Subsequently the landowner has confirmed that the site is potentially available for Gypsy, Traveller or Travelling Showpeople use.		
SUITABILITY		
Policy constraints		
<p>The very southern edge of the site is within flood zone 3. There is a Conservation Area adjacent the site to the south. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt</p>		
Physical constraints		
<p>The site slopes and would need to be levelled for caravans. Highways - Category: Red: The site is accessed via the public right of way network (Hertford footpath 095), which links onto Molewood Road at the south. The approach road to the site is initially quite narrow with no passing places, and therefore users of the right of way network may be inconvenienced by oncoming vehicles. Closer to the site, the access road opens out to double width. Molewood Place, to the north of the site, is a private cul-de-sac sloping down towards the site. Vehicles can travel along here at quite a high speed for the environment as a result, and therefore, the site access is unlikely to be able to provide a sufficient level of visibility in a northerly direction, unless it can be demonstrated that land need for a visibility splay is within the applicant's ownership, and that traffic calming measures along Molewood Place can be put in place. A very small number of plots at the site may be difficult to refuse on highway grounds, but in general, a development at this location would justify an objection on the grounds of compromising the safety and convenience of users of the public right of way network. It should be noted that the site is fundamentally unsuitable for traffic associated with travelling showpeople.</p>		
Accessibility to services:		
The nearest GP is 1.1 kilometres away. The nearest primary school is within 550 metres. The site is within 1.4 kilometres of the nearest shops. The nearest bus stop is 270 metres away. Hertford North train station is 760 metres away.		
Landscape Impacts		
<p>Site consists of an area a moderately sloping unmanaged land (former piggery with little evidence of any structures remaining) which is being colonised by trees and scrub, that lies south of a group of houses accessed off a private drive. A railway line forms the western boundary and a tree-lined track below the site to the south is followed by the Hertfordshire Way. Access is via a single track lane through woodland, past a distinctive group of buildings and over a narrow bridge; these features and a small stream (River Beane), creates a distinctive and discreet sense of place that belies its close relationship with the northern edge of the town. The site adjoins a Conservation Area and is not included within the Landscape Character Assessment (being deemed to be part of the urban area) but adjoins the Lower Beane Valley LCA where the landscape strategy is to 'conserve and strengthen' the landscape; this strategy would also be equally appropriate in this area. The site, whilst apparently moderately discreet, contributes to the 'soft' and distinctive edge of the urban area and any development would be most out of place as well as potentially having significant adverse effects on the sense of place, the amenity of the Hertfordshire Way (which also follows the access lane), and the setting of the Conservation Area.</p>		

Green Belt Comments

The site is located within Green Belt. As such any development would lead to a reduction in openness and constitute an encroachment into open countryside.

Other Potential Impacts

The site is adjacent existing residential properties and would potentially impact on the amenity of these properties.

ACHIEVABILITY

The site is not suitable and therefore unachievable.

Conclusion

Development on this site would have an unacceptable impact on the landscape and on the purposes of the Green Belt. The site is also unsuitable on highways grounds.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0
Potential occupants	
Type of use	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH004	Esbies Estate	Sawbridgeworth
Site address	Local authority	Size (ha)
	East Herts Council	2.0
Description of site		
<p>This is an existing unauthorised Gypsy and Traveller site and is split into a number of plots (1 - 46). Some of the plots are currently in use for Gypsy and Traveller purposes and other plots are vacant. Adjacent to the site are existing residential properties; the River Stort to the east and green space to the north and south. The site has good vehicle access from the existing highway.</p>		
<p><input checked="" type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location</p>		
Planning history		
<p>None of the plots on this site have planning permission for full residential or Gypsy and Traveller use. There have been numerous previous permissions on the site for seasonal/holiday chalet and caravan uses. Some of these previous permissions may be considered as fall back uses, whilst others would not as they have been used for other unauthorised uses such as commercial storage in the interim period. PBA would recommend a planning lawyer is required to provide a definitive view on which plots have a lawful fall back use of seasonal leisure use.</p>		
AVAILABILITY		
<p>Plots 39-41 are available for Gypsy and Traveller use. The same plot owner has confirmed that the remaining plots throughout Esbies is available for Gypsy and Traveller use, although it has not been possible to confirm availability with the individual plot owners.</p>		
SUITABILITY		
Policy constraints		
<p>The southern part of the site (plots 22-31) is within flood zone 3 and not suitable for Gypsy and Traveller use. The remaining plots are within flood zone 2. There is a Conservation Area adjoining the site to the east and north of the site, and the whole site is within the Green Belt. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt</p>		
Physical constraints		
<p>ORS estimate there are 4/5 families with Gypsy and Traveller background on site. Highways - Category: Green: The site currently accommodates several traveller plots, and is accessed from a private road which joins Station Road immediately next to The Forebury. Station Road is a C classified local distributor road subject to a speed limit of 30mph. The access road is double width (5.1 metres wide for its initial stretch), although visibility from it onto Station Road is somewhat restricted in an easterly direction. Visibility in a westerly direction is relatively good. The eastern side of the access road has a very tight radius, and there is no formal right turn facility into the access. This can result in occasional backing up of traffic along Station Road, especially if a 'wave' of traffic from the opposite direction passes by due to being held back earlier by the station crossing. The access is suitable to accommodate the traveller plots that are currently at the site, although even a small increase may require some minor access improvements. A more significant intensification of use of the access (either in terms of increased trip movements or larger vehicle types associated with travelling showpeople) would likely require more extensive modifications, such as the inclusion of a right turn facility on Station Road.</p>		
Accessibility to services:		
<p>The site is well located in sustainability terms, being located around 250 metres from Sawbridgeworth Station and 150 metres from the nearest bus stop, and with good proximity to local amenities: nearest GP is within 600 metres, primary school is within 400 metres, shops are within 500 metres.</p>		
Landscape Impacts		
<p>Site occupies land within the valley floor between houses off Forebury Avenue to the west and the River Stort and former Malting's to the east creating an area of development, that separates the undeveloped valley bottom to the north and south of the site and disrupts the continuity of the riverside landscape through the town. The site is sub divided into plots (many of which are almost totally surfaced) a number of which contain caravans (touring and static) or park homes, accessed off a lane to the north. Parts of the site are visible from outside, primarily from the river and land on the east side where caravans, lighting and boundary fencing are apparent. A footpath runs along the west bank and there are glimpses into parts of the site; close banded fencing erected along the edge of the path also impacts adversely on the enjoyment of the route. The Landscape Character Assessment identifies the site as part of the built up area.</p>		

Green Belt Comments

The site is situated in Green Belt and has had a tangible effect on openness by obstructing the continuity of the riverside landscape, and effectively merging the developments on either side, and encroaching into what was undeveloped countryside. Further development will only exacerbate and intensify these adverse effects. The development is clearly contrary to Green Belt purposes. Some Plots on the site have previous permissions for seasonal leisure caravan use; consequentially this permitted use will have a seasonal effect on the openness of the Green Belt and the perception of the area as part of the river corridor running through and sub-dividing the settlement. The potential lawful fallback uses effect on Green Belt openness is already 'accepted'. Clearly the current unauthorised use of the site has increased the adverse effect on openness with extensive surfacing, boundary fencing, and associated lighting associated with the subdivision of the area into numerous plots. There may be scope to rationalise and formalise the position by the removal of some plots for seasonal use in compensation for allowing a small area of permanent G&T use within the site, such that the overall net effect compared to the permitted use can be shown to lead to a tangible improvement in openness of the Green Belt in this area. This would need to involve the 'compensatory' restoration of a significant area of land to re-establish openness. This open area should be within the eastern part of the site where it would contribute to opening up and restoring the riverside landscape and amenity of the riverside footpath, with any development being limited to the north western part of the site.

Other Potential Impacts

The southern part of the site (plots 22-31) is within flood zone 3 and not suitable for Gypsy and Traveller use. The remaining plots are within flood zone 2.

ACHIEVABILITY

The whole site is not suitable for Gypsy and Traveller use and therefore not achievable. Potential delivery would require the rationalisation of use on the site (subject to the establishment of which plots have lawful fall back uses to seasonal leisure caravan use) and the remediation of a large part of the site which could involve considerable cost.

Conclusion

Development on this site would have an unacceptable impact on the purposes of the Green Belt, and therefore is not suitable for Gypsy and Traveller uses. Several plots on the site may have lawful fall back use to previous planning permissions for seasonal leisure caravan use, but the increase to all year round residential use for Gypsy and Traveller is still considered an unacceptable impact on the Green Belt. PBA recommend that the Council appoint a planning lawyer to establish the lawful use of plots and considered the rationalisation of those plots to the north western corner of the site in conjunction with the remediation of the remaining site (returning the land to open countryside to increase openness of the Green Belt and potentially balance the increased impact of permanent residential Gypsy and Traveller use in the north east corner.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Type of use

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement	
EH006	Land at Archers Green	Welwyn Garden City	
Site address		Local authority	Size (ha)
		East Herts Council	29.4
Description of site			
The site is a grassed area in the open countryside with mature trees, including oak trees, on it's boundaries and throughout the site.			
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input checked="" type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location			
Planning history			
There is no known relevant planning history.			
AVAILABILITY			
The site was promoted to the Council for development and assessed in the Strategic Land Availability Assessment. The site is potentially available for Gypsy and Traveller use within the next 10 to 20 years.			
SUITABILITY			
Policy constraints			
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt			
Physical constraints			
Highways - Category: Red: Direct vehicle access from the site onto B1000 Hertford Road would not be appropriate. This is a B classified secondary distributor road subject to a 60mph speed limit, and whilst there is no highway policy against new accesses onto such roads, it is very doubtful that the necessary level of visibility could be achieved. Access from the local access road stretch off Hertford Road (in the north eastern corner of the site) also appears to be problematic, most likely requiring the removal of many woodland trees for necessary visibility. This section of Hertford Road has a single width rural carriageway with restricted forward visibility in places. The westbound spur onto the B1000 has very restricted visibility in both directions, and the eastbound spur, although slightly better, is also substandard in this respect. Any additional traffic using these sections of the highway should be discouraged.			
Accessibility to services:			
The site is poor in terms of sustainable travel options, with no footways on the adjacent public highways, or any nearby rail stops (Hertford North is 3 kilometres away). The nearest bus stop is within 60 metres. The nearest GP is within 3 kilometres, the nearest primary school is within 700 metres, and there are shops within 4 kilometres.			
Landscape Impacts			
This large elongated area of land lies within the Mimram Valley Parklands LCA (landscape strategy is to 'safeguard and manage'). The southern boundary adjoins the valley floor where the river and associated land is identified as a wildlife site and area of flood risk. The site comprises a gently sloping sweep of pasture of medium scale, open and subdivided by fences, that defines the northern valley side. A number of rights of way, including Chain Walk, cross the site. The eastern end of the site is more elevated and substantially enclosed by woodland abutting a Historic Park and Garden (Panshager Estate). The surroundings have a parkland character, which extends outwards from the estate with significant woodlands. The valley and river combined with the vegetation pattern gives the area a distinctive and strongly rural character with few detracting features. Any development within the site would be wholly out of place and not consistent with the landscape strategy for this distinctive LCA.			

Green Belt Comments

The site is located within Green Belt. The land contributes substantially to the maintenance of separation between Welwyn and Hertford. Any development would be a clear encroachment into open countryside and detract from the openness of the designated area.

Other Potential Impacts

There are no other known potential impacts.

ACHIEVABILITY

The site is not suitable and therefore not achievable.

Conclusion

Development on this site would have an unacceptable impact on landscape character and on the purposes of the Green Belt. The site is also unsuitable on highways grounds.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Type of use

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH008	Land South of Owles Lane	Buntingford
Site address	Local authority	Size (ha)
	East Herts Council	0.7
Description of site		
<p>This is a greenfield site on the south eastern edge of Buntingford, which is adjacent existing residential properties and a large vacant employment shed and associated buildings. The site is accessed via a narrow residential road, Owles Lane. The land slopes down from the central section to the eastern boundary.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input checked="" type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
<p>There is no known relevant planning history.</p>		
AVAILABILITY		
<p>The landowner has confirmed that the site is potentially available for Gypsy, Traveller and/or Travelling Showpeople use.</p>		
SUITABILITY		
Policy constraints		
<p>The eastern edge of the site is within flood zone 3. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt</p>		
Physical constraints		
<p>Highways - Category: Amber: The northern part of the site borders Owles Lane, an unclassified local access road subject to a 30mph speed limit. It is narrow, of single width, for most of its length, with few passing places for vehicles. Visibility from Owles Lane onto London Road is reasonable. A site of up to 15 pitches might be acceptable subject to a suitable access point onto Owles Lane, but larger vehicles associated with Travelling Showpeople would not be acceptable.</p>		
Accessibility to services:		
<p>There are no footways along Owles Lane, although the site is not far from London Road which benefits from footways on both sides, and is a bus route. Buntingford town centre is located approximately 1 kilometre away. The nearest GP is within 1.5 kilometres and the nearest primary school is within 1 kilometre.</p>		
Landscape Impacts		
<p>Most of this site is highly exposed and any development would be out of place and intrusive. However, on the western edge the site forms an indent in the settlement edge with houses to the north, west and south. This area (marked in red on the map) of land is discreet being contained from the wider landscape to the east by the roll of the ridge immediately to the east and related well to existing development which is softened by vegetation. There is scope to accommodate a small Gypsy and Traveller site in this location without wider landscape and visual harm with a new access off Owles Lane, although there are likely to be amenity issues in relation to existing dwellings which may limit scope. Whilst this will be contrary to existing countryside protection policy, if development is to be considered, mitigation in the form of planting along the southern side of the access and site boundary should be provided to provide a robust and defensible (possibly redefined) settlement edge.</p>		

Green Belt Comments

The site is not within the Green Belt.

Other Potential Impacts

The area of land identified as suitable in landscape terms is immediately adjacent residential properties. Therefore any Gypsy and Traveller development in this location would have an unacceptable impact on residential amenity of the neighbouring properties.

ACHIEVABILITY

The site is not suitable and therefore is not achievable.

Conclusion

Development on the majority of this site would have an unacceptable landscape impact. The remaining part would have an unacceptable impact on residential amenity. If Gypsy, Traveller and/or Travelling Showpeople use is proposed for EH034 Land South of Buntingford, the Council may consider the North west corner of the site as an option to assist with viability and ensuring the provision of the housing requirements.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Type of use

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement	
EH018	Land at Braziers Field	Hertford	
Site address		Local authority	Size (ha)
		East Herts Council	0.6
Description of site			
Area of woodland/scrub within the urban area of Hertford. The access road is via a residential road, Woodlands Road. An employment area is located to the south and west of the site.			
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input checked="" type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location			
Planning history			
There is no known relevant planning history.			
AVAILABILITY			
The site is owned by East Herts District Council and therefore deemed potentially available for Gypsy and Traveller or Travelling Showpeople use. Council Property Services state that the site has been recognised as surplus to requirements by the Council for many years and intend to dispose of it in due course for a mixture of private and affordable housing possibly with some elderly provision in line with nearby housing accommodation. The recession has delayed any action and it is programmed for review later this year.			
SUITABILITY			
Policy constraints			
The site is within the urban area of Hertford and is not within any policy designation.			
Physical constraints			
The site slopes steeply which could limit development as a Gypsy and Traveller site and would require further investigation for any proposal. Highways - Category: Amber: The site fronts onto Woodlands Road, an unclassified local access road serving around 80 residential units. The carriageway of Woodlands Road is double width although some sections do experience relatively heavy roadside parking which restricts it to single width. The site could potentially be suitable, however if caravans and larger vehicles routinely access the site then this makes it much more unsuitable due to the limited forward visibility and roadside parking which forces vehicles onto the opposite side of the carriageway in possible conflict with oncoming vehicles.			
Accessibility to services:			
The site is within 400 metres of a bus stop and 1 kilometre of Hertford East train station. The nearest GP is within 350 metres, the nearest primary school is within 450 metres, and there are shops within 1.5 kilometres.			
Landscape Impacts			
The site is within the urban area.			

Green Belt Comments

The site is not within the Green Belt.

Other Potential Impacts

The site is accessed through an established residential area and therefore existing residential amenity would need to be considered in any proposal.

ACHIEVABILITY

The site is proposed to be developed for alternative uses (residential and elderly housing). Whilst potentially available, policy and physical constraints indicate that the site would be difficult to deliver for Gypsy and Traveller use without considerable mitigation.

Conclusion

The site is unavailable and unsuitable for Gypsy and Traveller or Travelling Showpeople uses, due to proposed Council use for residential and elderly housing and unsuitable highway access via an existing residential area. The road layout and parked cars allow limited forward visibility and forces vehicles onto the opposite side of the carriageway in possible conflict with oncoming vehicles. The site is also close to residential properties and whilst not insurmountable, this is another potential constraint.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Gypsies and Travellers

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement	
EH025	Land between 50-52 Widford Rd	Hunsdon	
Site address		Local authority	Size (ha)
		East Herts Council	0.0
Description of site			
This is a small piece of land which is currently being used as a garden to an adjacent residential property, within Hunsdon. It is situated within a residential area and immediately adjacent other houses.			
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input checked="" type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location			
Planning history			
There is no known relevant planning history.			
AVAILABILITY			
The site is owned by East Herts District Council and therefore deemed potentially available for Gypsy and Traveller or Travelling Showpeople use.			
SUITABILITY			
Policy constraints			
The site is within the village of Hunsdon and not within the open countryside.			
Physical constraints			
There are no known physical constraints.			
Accessibility to services:			
The site is within 300 metres of a bus stop and 4.5 kilometres of Roydon train station. The nearest GP is within 4.2 kilometres, the nearest primary school is within 400 metres, and there are shops within 4.3 kilometres.			
Landscape Impacts			
The site is within the urban area and therefore would not have any unacceptable impact on landscape character.			

Green Belt Comments

The site is not within the Green Belt.

Other Potential Impacts

The site is immediately adjacent residential properties, therefore any Gypsy and Traveller development in this location would have an unacceptable impact on residential amenity of the neighbouring properties.

ACHIEVABILITY

The site is not suitable and therefore is not achievable.

Conclusion

The site is being used as a garden and is immediately adjacent existing residential properties.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0
Potential occupants	
Type of use	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH026	Land at Poplar Close	High Cross
Site address	Local authority	Size (ha)
	East Herts Council	1.0
Description of site		
The site is part agricultural land and partly an overgrown area, on the eastern edge of High Cross, adjacent existing residential properties. The site has poor access off North Drive.		
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input checked="" type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
The site is owned by East Herts District Council and therefore deemed potentially available for Gypsy and Traveller or Travelling Showpeople use.		
SUITABILITY		
Policy constraints		
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt; VILL1 Group 1 Villages		
Physical constraints		
The site has poor access off North Drive.		
Accessibility to services:		
The site is within 450 metres of a bus stop and 4.5 kilometres of Ware train station. The nearest GP is within 4.1 kilometres, the nearest primary school is within 350 metres, and there are shops within 4.2 kilometres.		
Landscape Impacts		
The eastern boundary of the site is arbitrary with the eastern edge of the central woodland block being used to 'square off' the boundary. The western boundary is defined by the edge of this wood and belts of woodland to the north and south; these form a strong landscape and visual edge to the settlement. The site boundary includes a narrow paved roadway which serves the rear gardens of the adjoining houses at Poplar Close. A right of way runs along the northern and eastern edge of the field, with a bridleway along the southern edge. These meet in the south east corner to cross the A10 via a bridge. Whilst the A10 has severed the field from the wider landscape to the east and mitigation mounding and planting alongside the A10; setting of the village has therefore been foreshortened creating a more discreet and intimate landscape than may have existed previously. The site is considered to be a wholly unsuitable location for development. Access is restricted and, to improve it would inevitably mean the loss of some significant vegetation on this important edge and any development beyond this well-defined edge would be a clear encroachment into open countryside beyond the visual and physical limits of the settlement. This would be contrary to the strategy of improving/conserving the landscape.		

Green Belt Comments

The site is not within the Green Belt.

Other Potential Impacts

The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of existing properties.

ACHIEVABILITY

The site is not suitable and therefore is not achievable.

Conclusion

The site does not have an adequate access and development on this site would have an unacceptable impact on the landscape.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0
Potential occupants	
Type of use	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement	
EH028	Land at Park Cottages	Eastwick	
Site address		Local authority	Size (ha)
		East Herts Council	0.3
Description of site			
This is a green field piece of land located to the south of the village of Eastwick, which has no highway access.			
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input checked="" type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location			
Planning history			
There is no known relevant planning history.			
AVAILABILITY			
The site is owned by East Herts District Council and therefore deemed potentially available for Gypsy and Traveller or Travelling Showpeople use.			
SUITABILITY			
Policy constraints			
The central parts of the site is within flood zone 2 and 3. There is a Conservation Area adjacent the site to the south and a Listed Building to the west of the site. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt			
Physical constraints			
A large part of the centre of the site is within flood zone 3 which would restrict development in this location.			
Accessibility to services:			
The site is within 150 metres of a bus stop and 1.2 kilometres of Harlow Town train station. The nearest GP is within 4.3 kilometres, the nearest primary school is within 3.1 kilometres, and there are shops within 5.1 kilometres.			
Landscape Impacts			
The site is uncontained and development would be very visible and out of place, extending into an open level field on the edge of this compact settlement.			

Green Belt Comments

Development would be contrary to Green Belt purposes, representing a clear reduction in openness and an apparent encroachment into countryside, within an area where the separation between Eastwick and the northern edge of Harlow is relatively narrow.

Other Potential Impacts

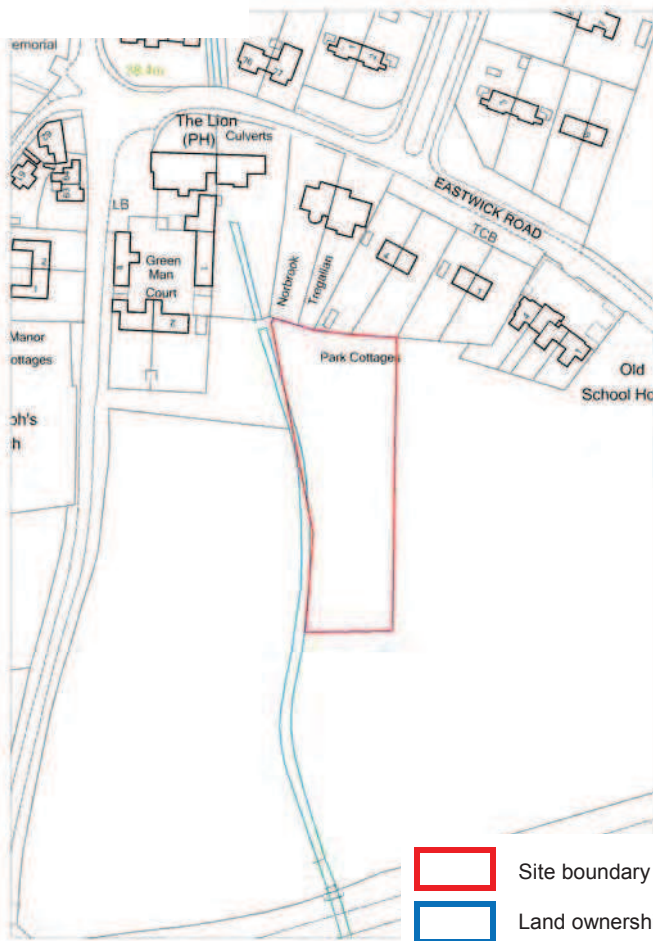
Any development in this location would potentially impact on the setting of church, which is a listed building. The northern part of the site is immediately adjacent existing residential properties and therefore this location would not be suitable for Gypsy and Traveller use, due to the potential impact on residential properties of the neighbouring properties.

ACHIEVABILITY

The site is not suitable and therefore is not achievable.

Conclusion

The site does not have access to a highway. Development in this location would have an unacceptable impact on landscape character and on the purposes of the Green Belt. The northern part of the site is adjacent existing residential properties and the central part of the site is within flood zone 3. Therefore the site is not suitable for Gypsy and Traveller use.



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DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Type of use

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

Site ref	Site name	Settlement	
EH029	Land adjacent 11 Roseley Cottages	Eastwick	
Site address		Local authority	Size (ha)
		East Herts Council	0.1
Description of site			
The site is a small piece of land which looks like part of the garden for 11 Roseley Cottages. It is accessed via a residential street via a garage court.			
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input checked="" type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location			
Planning history			
There is no known relevant planning history.			
AVAILABILITY			
The site is owned by East Herts District Council, although it is currently in use for a garage court and therefore is not available for Gypsy and Traveller or Travelling Showpeople use.			
SUITABILITY			
Policy constraints			
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt			
Physical constraints			
The site access is too narrow for Gypsy and Traveller use and therefore not suitable.			
Accessibility to services:			
The site is within 250 metres of a bus stop and 1.3 kilometres of Harlow Town train station. The nearest GP is within 4.1 kilometres, the nearest primary school is within 3 kilometres, and there are shops within 5.2 kilometres.			
Landscape Impacts			
The site comprises an area of land at the western end of a terrace of houses within the clearly defined curtilage of the settlement. In landscape and visual terms the site is a suitable location for development.			

Green Belt Comments

The settlement, including the site is 'washed over' by Green Belt. Whilst in purpose terms the site lies within countryside it does not have a rural character and development would not represent an encroachment into rural countryside. However, in Green Belt purpose terms, any development would represent a reduction in openness of the Green Belt, although given its clear relationship adjoining development within the settlement envelope the site may be considered suitable.

Other Potential Impacts

The site is immediately adjacent existing residential properties and therefore this location would not be suitable for Gypsy and Traveller use, due to the potential impact on residential properties of the neighbouring properties.

ACHIEVABILITY

The site is not suitable and therefore is not achievable.

Conclusion

The site is in use as a garage court and not available for Gypsy and Traveller use. The site does not have adequate access to the highway and is also adjacent existing residential properties.

DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0
Potential occupants	
Type of use	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission



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Site ref	Site name	Settlement
EH031	Land rear 4 & 4a Ashendene Road	Bayford
Site address	Local authority	Size (ha)
	East Herts Council	0.1
Description of site		
<p>The south western part of the site is previously developed land with 6 single storey garages and concrete and stone surfacing. Access is shared with the primary school that lies directly to the south west and the hard standing appears to be used for school parking and as a drop-off point. The north western part is grassland appears to be managed by local people as a nature/wildflower area. Hedges define the boundaries of this grass area and there are some garden gates providing access into it. A mature oak tree lies on the north east boundary.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input checked="" type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
<p>The site is owned by East Herts District Council and therefore deemed potentially available for Gypsy and Traveller or Travelling Showpeople use. However, the garage court section is currently in use and the grassed area is amenity land, therefore both sections of the site are not available for Gypsy and Traveller use.</p>		
SUITABILITY		
Policy constraints		
<p>Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt</p>		
Physical constraints		
There are no known physical constraints.		
Accessibility to services:		
<p>The site is within 40 metres of a bus stop and 600 kilometres of Bayford train station. The nearest GP is within 4.3 kilometres, the nearest primary school is within 80 metres, and there are shops within 4.5 kilometres.</p>		
Landscape Impacts		
<p>In landscape terms, whilst the developed part of the site is a suitable location for development as it is previously developed land and contains no notable landscape features other than the boundary hedges, the undeveloped part of the site is not a suitable location as it would compromise the green character and edge to the village. If garage court part were to be developed this would also detract from the open nature of the undeveloped part with the addition of boundary fencing. Therefore the site is considered to be unsuitable.</p>		

Green Belt Comments

The site lies within Green Belt which 'washes over' the village. The existing garages detract from the openness of the Green Belt; if these were demolished and development (within the previously developed area) were to create no overall net change in the volume of buildings there would be no net change in the openness of the Green Belt.

Other Potential Impacts

The site is immediately adjacent existing residential properties and therefore this location would not be suitable for Gypsy and Traveller use, due to the potential impact on residential properties of the neighbouring properties.

ACHIEVABILITY

The site is not suitable and therefore is not achievable.

Conclusion

The garage is currently in use and the grassed area is amenity land, therefore the site is not available for Gypsy and Traveller use. Development on this site would have an unacceptable impact on landscape character and Green Belt purposes. There is also a potential impact on neighbouring properties.



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DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0
Potential occupants	
Type of use	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

Site ref	Site name	Settlement
EH032	Land east of Reedings Way	Sawbridgeworth
Site address	Local authority	Size (ha)
	East Herts Council	0.9
Description of site		
<p>This is a green field site on the eastern edge of Sawbridgeworth which is accessed through a residential area on Reedings Way. The site is a large green field with a few trees and bushes on site. Allotments are situated to the south east; the River Stort to the south east; and unknown use to the north of the site which appears to be large agricultural or employment sheds with vast area of disturbed land. The land drops down from the west to the east of the site.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input checked="" type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
<p>The site is owned by East Herts District Council and has been confirmed as not available by the Council. Property Services - This land was until recently managed by my Team and let for grazing. The grazing agreement terminated and the land is now being managed by the Council's Parks and Open Spaces Team. It forms part of a larger area of open space and amenity land bordering the river. Part of the land behind the housing has been separated off and developed as a scout and community building and is leased to the local scout group for 40 years.</p>		
SUITABILITY		
Policy constraints		
<p>Parts of the eastern boundary are within flood zone 2 and the very edge of the boundary is within flood zone 3. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt</p>		
Physical constraints		
<p>The site shares its access within the Scout Club which is situated to the west of the site. Highways - Category: Green: The site links into Reedings Way, which itself is connected to the wider highway network via Northfield Road, Bullfields and Cutforth Road. Many sections of these roads experience heavy roadside parking which reduces available carriageway width to one lane. Forward visibility is restricted in places. Traffic calming measures have been introduced along certain stretches of the highway, including that outside Reedings Junior School. Visibility onto Cambridge Road / A1184 from Cutforth Road is reasonable in both directions. Visibility from Bullfields onto Station Road is more restricted in both directions. A plot serving up to 15 pitches may be acceptable, subject to a suitable access into the site, but larger vehicles associated with Travelling Showpeople are unlikely to be acceptable at this location, given the need to route through relatively busy residential areas which have the limitations outlined above.</p>		
Accessibility to services:		
<p>Access to the sustainable transport infrastructure and local amenities is reasonable. The site is within 200 metres of a bus stop and 600 metres of Sawbridgeworth train station. The nearest GP is within 1 kilometre, the nearest primary school is within 450 metres, and there are shops within 900 kilometres.</p>		
Landscape Impacts		
<p>It consists of two rough pasture fields sloping gently down from the north east edge of the town to the River Stort navigation the east side of which is followed by a public footpath from which there appear to be views into the site. Allotments lie to the south, and a low grade landscape to the north around Kecksy's Bridge where there are buildings, scattered materials, and various other activities. The locality bears little relationship to the principal characteristics of the LCA (Thorley Uplands LCA) of which it forms the southern 'tip'. Whilst development within this site, being located immediately adjoining the town, bounded by other disrupted land and largely free of significant landscape features (other than boundary vegetation) is unlikely to have wider landscape or visual effects it would be apparent from the riverside footpath and extend development east of the current built up area. Overall, this is considered to be a poor site for Gypsy and Traveller development.</p>		

Green Belt Comments

The site lies within Green Belt and any development would constitute a reduction in openness and encroachment into countryside which may only be justified by 'exceptional circumstances'.

Other Potential Impacts

The site is close to existing residential properties, therefore any development could impact on the residential amenity of existing properties.

ACHIEVABILITY

The site is not suitable and therefore is not achievable.

Conclusion

The site is not available for Gypsy and Traveller use. Development on this site would also have an unacceptable impact on landscape character and Green Belt purposes.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0
Potential occupants	
Type of use	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH044	South of Hertford	Hertford
Site address	Local authority	Size (ha)
Land west of Mangrove Road	East Herts Council	4.9
Description of site		
The strategic site is proposed for 50 homes to the west of Mangrove Road by 2021. This is an area of greenfield land located between existing urban areas and a green wedge area, on the southern edge of Hertford.		
<input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.		
SUITABILITY		
Policy constraints		
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; New Developments in Conservation Areas (BH6); Sport and Recreation Facilities (LRC1) Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; HERT5 South of Hertford (allocation for 50 homes and greenspace buffer west of the site by 2021); Policy HA4 Conservation Areas		
Physical constraints		
Highways - The District Plan notes that 50 homes will be provided to the west of Mangrove Road by 2021. The EHC assessment notes that development of over 500 new dwellings would require the provision of a southern bypass to Hertford but 500 or fewer dwellings could be accommodated through upgrades to Mangrove Road. The development of the site was rated "Red" by the HCC due to potential impacts on the A414. However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the additional vehicle trips generated and the congestion issues can be mitigated. The site is considered to be suitable for Gypsies and Travellers, as the impacts of vehicle trips generated by Gypsy and Traveller are similar in character to general residential vehicle trips, and would not cause any significant adverse impacts on the local road network. The site is also considered to be accessible as sustainable transport measures including the encouragement of walking and cycling (including, inter alia, an upgraded pedestrian and cycle way along Mangrove Road to Simon Balle School), and enhanced passenger transport services will be provided to the site. The site is not considered to be suitable for Travelling Showpeople. Mangrove Road has a narrow carriageway that would not be able to accommodate larger vehicles associated with Travelling Showpeople. There is limited scope for widening the carriageway due to existing residential development and the scale of the proposed development limits the potential for significant highways contributions to fund widening.		
Accessibility to services:		
The nearest GP is within 600 metres. The nearest primary school is within 400 metres. The site is within 700 metres of the nearest shops. The nearest bus stop is within 50 metres. Hertford East train station is within 1 kilometre.		
Landscape Impacts		
Strategy Supporting Paper (area 13C) - This site is within a larger parcel of land assessed within the Paper. Landscape Character Scoring = Red. The LCA defines the site as lying within the town. It comprises a broadly rectangular level area of land (former sports ground) bounded by recent development to the north, a 'freestanding' rectangular block of housing to the south, Mangrove Road and sports ground to the east, and distinct narrow valley landform to the west. Trees provide robust features along the eastern southern and western boundaries and development contains the site to the north; the site therefore has a discreet and enclosed character and is unmanaged at present. It is identified as a wildlife site and part of a Conservation Area.		

Green Belt Comments

Strategy Supporting Paper (area 13C) - Green Belt = Red.

Draft Green Belt Review (area 21) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Significant Contribution' to check the unrestricted sprawl of large built-up areas. It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt. The site lies on the southern edge of the town and occupies parcel 08C within Hertford Sub-Area C (Area 08) identified in the GBR. The GBR notes that the Area does contribute to checking sprawl 'to an extent', provides no contribution to preventing the merger of towns, and assists in safeguarding countryside from encroachment. However, the land on the eastern side of the road is deemed to fulfil these functions to a greater degree. Although the site is noted as a Wildlife Site, and boundary vegetation and the edge of the valley would also need to be respected, from a landscape and visual perspective the site appears to offer an opportunity to accommodate development without wider harm or significant conflict with Green Belt purposes. G&T development on its own is likely to be considered out of place in this site but, if the area is to be released from Green Belt, there may be an opportunity to accommodate a small scale development as part of a considered masterplan.

Other Potential Impacts

Historic Environment - The site is located within the Hertford Conservation Area and in general terms static and touring caravans and associated works would not contribute to the characteristics of the built form in terms of their location, form, scale, mass, design and materials; namely low levels of development containing large plots of detached buildings balanced with open space and vegetation. Furthermore they may not use local materials or respect the pattern of local development. Therefore any proposed development would not relate to the Conservation Area in a significant way, nor would it reflect the historic development of the immediate or wider setting, consequently not preserve or enhance the character and appearance of the Conservation Area.

ACHIEVABILITY

It appears that Gypsy, Traveller or Travelling Showpeople in this location would have an unacceptable impact on the Hertford Conservation area and could not be developed as part of an urban extension by developers, even if specific masterplanning and viability testing illustrates this could be appropriately designed. Policy and physical constraints are therefore not capable of being overcome and the site is not considered an achievable option.

Conclusion

The site is not confirmed as available and not considered to represent a policy option for the Council to deliver a small scale private Gypsy, Traveller or Travelling Showpeople site, due to the negative impact development could have on the Hertford Conservation Area.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Appendix E Sites with Potential - Stage 2

Site ref	Site name	Settlement	
EH005	Elmfield Stables	Throcking	
Site address		Local authority	Size (ha)
		East Herts Council	0.3
Description of site			
<p>This is an existing Gypsy and Traveller site comprising a single touring caravan, stables and large area of flat pasture land. It has access from a private road (with right of way) and there are a number of other residential properties and stable buildings within the local area, accessed off the same road. There is a public right of way crossing the southern part of the site.</p>			
<input checked="" type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location			
Planning history			
<p>Planning permission (3/12/1411/FP) for 1 pitch was refused on appeal (APP/J1915/A/12/2187829) on factors relating to the character and appearance of the rural area; sustainability; and nature conservation interests. An Ecology Assessment was not submitted with the planning application.</p> <p>The refused planning application and appeal decision were based upon an application for 1 mobile home, 1 touring caravan and stables.</p>			
AVAILABILITY			
<p>This is an existing unauthorised Gypsy and Traveller site requiring full planning permission. The owner has confirmed the site is available for 1 Gypsy and Traveller pitch.</p>			
SUITABILITY			
Policy constraints			
<p>Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt</p>			
Physical constraints			
<p>Highway - The site is accessed via a private road, and the landowner has right of access to the site. The site is remote from the main public highway, which itself is relatively narrow in places, with limited forward visibility. Small grass verge strips on either side provide some room for vehicles to pass by pedestrians and cyclists, but horse riders are more likely to be inconvenienced. A right of way route serves the site directly (Cottered 033 footpath) and this is of single width with few passing places. The access into the site drops down quite steeply and has substandard visibility onto the right of way carriageway in both directions, which will need improvement as part of any planning application. A development of a small number of pitches at the site may be acceptable to the highway authority, but in general, a development of any scale in this location would justify an objection on the grounds of compromising the highway safety and convenience of users of the public right of way network. It should be noted that the site is fundamentally unsuitable for traffic associated with Travelling Showpeople.</p>			
Accessibility to services:			
<p>Site sustainability is poor with no amenities in close proximity: The nearest bus stop is within 700 metres, but is not a regular service. The nearest GP is within 3.5 kilometres, the nearest primary school is within 4 kilometres, and there are shops within 4 kilometres.</p>			
Landscape Impacts			
<p>The area has already has several agricultural buildings located near the defined northern boundary of the site and adjacent site. Development of any significant scale would result in an unacceptable landscape impact given the sites openness from the public right of ways to the south and across the site. The impact of the existing unauthorised touring caravan is low and local. This is acceptable but a fenced compound with a number of touring vans and static caravans would be unsuitable. If development for a single touring pitch is to be acceptable the caravan would need to be retained close to the northern boundary and avoid the introduction of intrusive fencing. Suitable boundary treatments would include hedgrows in keeping with surrounding boundaries.</p>			

Green Belt Comments

The site is not within the Green Belt.

Other Potential Impacts

Ecology - Great Crested Newts and Barn Owl have been identified in the area. The site will require ecological investigation and proposed mitigation as part of any planning application. It is considered that the site is potentially suitable if this issue is appropriately addressed across the wider site ownership (outlined red and blue on the site plan).
There is a residential property to the east of the site, but it is set back from the site and does not overlook the site.

ACHIEVABILITY

There are potential costs for mitigation measures relating to landscaping, ecology and potential transport measures. There appear to be no reasons why the existing touring caravan could not gain full planning permission for the existing occupant. The land is available, policy and physical constraints are capable of being overcome and mitigation measures are feasible subject to the ability of the owner to finance the development. The development appears to be viable.

Conclusion

The site is an existing unauthorised site with 1 touring caravan, which is available for permanent planning permission. A previous application was refused for 1 mobile home, 1 touring caravan and stables in this location. That scale of development was not suitable in landscape terms. However, a small scale development for permanent permission for 1 touring caravan is suitable in planning policy terms, subject to appropriate mitigation for landscape, highways and ecology. The site does not have good access to local services or facilities but the impact of travel for 1 touring caravan in this location is considered minimal. The site meets the needs of the current occupier so represents a good fit with identified needs. The site would not be suitable for additional caravans or the provision of static accommodation in this location due to potential landscape impacts.



DELIVERY

Potential Yield	
2014 - 2018	1
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants
Romany Gypsies

Type of use
Residential

- Delivery model**
- Existing private site for either permanent authorisation, intensification or extension to meet family needs
 - Existing private site for intensification or extension to meet wider needs of communities
 - New private site for development
 - Existing public site for intensification or extension
 - New public site for development
 - New site to be developed as part of an urban extension
 - Existing site requiring planning permission

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Site ref	Site name	Settlement
EH013	Nine Acres	High Cross
Site address	Local authority	Size (ha)
	East Herts Council	3.0
Description of site		
<p>This is an existing Gypsy and Traveller site, situated to the south of High Cross, comprising a large site which appears to be previously developed, although mostly now overgrown with bushes and scrub. The site has existing caravans on site and a large area of hardstanding visible from the road entrance. It is located to the east of the main road leading into the village, with the access in the northern corner adjacent a large employment site.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input checked="" type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
<p>Planning permission (3/0018/94FP) was granted on appeal for 2 mobile homes (+ 2 commercial vehicles and 1 trailer). Planning permission (3/10/1758/FP) increased the number of caravans to allow 6 additional mobile homes, which has not yet been fully implemented, but the construction of the hardstanding has commenced.</p>		
AVAILABILITY		
<p>This is an existing Gypsy and Traveller site and therefore potentially available for further pitches. The landowner states there is space for 2 additional caravans. Availability of the site is confined to immediate friends and family members.</p>		
SUITABILITY		
Policy constraints		
<p>Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt; land to the east of the site is designated Historic Park and Garden covered by Local Plan policy BH16 Historic Parks and Gardens. Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt; HA1 Heritage Assets; HA8 Heritage Assets</p>		
Physical constraints		
<p>The site is not flat and slightly undulating which could be due to a previous landuse. Highways - Category: Green: Access to the site is shared with the adjacent industrial site. It is very wide, and visibility in both directions is reasonable. A significant intensification of use, or a change of use to include vehicles associated with travelling showpersons, would benefit from improvements to the access to more clearly segregate it from the industrial unit access. However, an increase of just 2 caravans is of little significance from a highways aspect.</p>		
Accessibility to services:		
<p>A footway runs along both side of the High Road carriageway and leads directly to the centre of High Cross, approx 350 metres away. This area benefits from bus stops and local amenities: The nearest GP is within 4 kilometres, the nearest primary school is within 500 metres, and there are shops within 4.5 kilometres.</p>		
Landscape Impacts		
<p>The only views that appear to be possible into the site are from the site access, although this is limited by vegetation. A hedgerow along the southern boundary contains the site from the land which falls away to the south although this edge is likely to be visually sensitive. The hedgerow along the western roadside boundary obscures most of the site and there appears to be scrub developing on the adjoining parts of the site. There appear to be no overriding landscape or visual constraints to the accommodation of further development within this site. If further pitches are to be permitted these should be located close to the existing group, and avoid impacting on trees and hedgerows. Given the size of the site there are opportunities to accommodate planting to 'close off' the view into the site from the access road. Planting could be used to define a limit to any expansion of the existing development.</p>		

Green Belt Comments

The site is not within the Green Belt.

Other Potential Impacts

Land to the east of the site is designated Historic Park and Garden, although the majority of the designated site lies beyond the A10.

ACHIEVABILITY

There appear to be no reasons why the site could not be further developed by the existing occupants. The land is available, policy and physical constraints are capable of being overcome and mitigation measures are feasible subject to the ability of the owner to finance the development. The development appears to be viable.

Conclusion

This is an existing Gypsy and Traveller site with 6 authorised pitches which needs to be safeguarded. The authorised pitches meet the needs of the family up to the end of the plan period. The site is available for a further 2 pitches, but these pitches would not be required within the plan period as the identified need in the Accommodation Needs Assessment has already been met on site. The site is suitable for 2 or more pitches, subject to landscape and highway mitigation beyond the plan period.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	2

Potential occupants

Gypsies and Travellers

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH014	Field Farm	Levens Green
Site address	Local authority	Size (ha)
	East Herts Council	1.3
Description of site		
This is an existing Gypsy and Traveller site, situated within a countryside location. It comprises existing mobile caravans, a large agricultural building and number of other caravans. The site is well screened from the road.		
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input checked="" type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location		
Planning history		
Planning permission (3/2143/87EN) for 2 caravans was granted on appeal in 1992. Planning permission (3/0718-94FO) increased to a total of 4 caravans. Planning permission (3/12/1903/FP) then increased the number to a total of 6 caravans.		
AVAILABILITY		
This is an existing Gypsy and Traveller site and therefore potentially available for further pitches. The landowner states there is space for an additional 2 caravans.		
SUITABILITY		
Policy constraints		
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt		
Physical constraints		
Highways - Category: Amber - Red: The site is located on the C95 a classified local distributor road subject to the maximum speed limit of 60mph. Due to the rural nature of the road, with restricted carriageway widths in places and limited forward visibility, it is reasonable to assume that typical traffic speeds will be somewhat lower than this. However, the current site access is poor in terms of visibility and falls well short of standards. This, combined with the fact that the site is remote from the wider strategic highway network, means that even a modest increase in trips at this site would be unacceptable. An additional 2 pitches may be acceptable although this would need to be subject to a thorough assessment of on-site parking and turning space facilities, and a wider assessment of accident statistics, etc. Any more than this is very unlikely to receive the approval of the Highway Authority unless significant improvements are made to the access. The site is not suitable for the larger types of vehicles associated with Travelling Showpeople.		
Accessibility to services:		
The site is remote from the sustainable transport network, the nearest train station is over 6 kilometres away. The nearest GP is within 4 kilometres, the nearest primary school is within 2 kilometres, and the nearest shops are over 7 kilometres away.		
Landscape Impacts		
There appears to be scope to accommodate an additional pitch without significant landscape or visual harm as long as this is located in the southern part of the site closely related to the existing buildings, although this would be an encroachment into countryside where development is normally resisted. Existing boundary vegetation is important to the assimilation of this site and this vegetation should be protected (and perhaps enhanced) as part of any proposal. Development should not be located near the western boundary (where reinforcement may be justified) and new (native) planting should be required in the form of a hedgerow along the northern and eastern side of the site access and park home to screen views in from the site entrance, conceal the suburban boarded fence alongside the existing plot and define the boundary of the site from the adjoining field.		

Green Belt Comments

The site is not within the Green Belt.

Other Potential Impacts

There are no other known potential impacts.

ACHIEVABILITY

There appear to be no reasons why the site could not be intensified by the existing residents. The land is available, policy and physical constraints are capable of being overcome and mitigation measures are feasible subject to the ability of the owner to finance the development. The development appears to be viable.

Conclusion

This is an existing Gypsy and Traveller site which needs to be safeguarded. There is scope to accommodate an additional pitch without significant landscape impact, although any further proposals would need to be subject to a thorough assessment of highway impact and landscape mitigation measures. The GTAA identified that the site has unused permissions on it which mean meets its needs until 2031. Therefore the additional pitch should not be required within the plan period.



Site boundary
 Land ownership

DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	1
Potential occupants	
Gypsies and Travellers	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Appendix F Green Belt Sites with Potential – Stage 2

Site ref	Site name	Settlement
EH001	The Stables	Bayford
Site address	Local authority	Size (ha)
Bayford Lane	East Herts Council	0.3
Description of site		
<p>This is an existing Gypsy and Traveller site, situated within a countryside location, to the south west of Hertford. It is located on the corner of Bayford Lane and Lower Hatfield Road and comprises existing caravans on the north eastern corner, and the remainder of the site is greenfield.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input checked="" type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
<p>Planning permission (3/02/0941/FP) granted on appeal for 1 caravan. Planning permission (3/08/1100/FP) was granted on appeal, in 2009, to increase the number of caravans to 5 in total, plus 1 touring caravan. Planning permission (3/13/1803/FO) was granted, in 2014, for an additional 3 caravans.</p>		
AVAILABILITY		
<p>This is an existing Gypsy and Traveller site and the landowner has stated that the site is available for further pitches. The ANA has not identified specific needs from the site, therefore it is considered that available capacity will not be required until after 2031.</p>		
SUITABILITY		
Policy constraints		
<p>Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt</p>		
Physical constraints		
<p>Highways - Category: Amber: Direct vehicle access from the site onto Lower Hatfield is unlikely to be appropriate. This is a B classified secondary distributor road subject to a 60mph speed limit, and whilst there is no highway policy against new accesses onto such roads, it is very doubtful that the necessary level of visibility could be achieved. The existing access onto Broad Green / Bayford Lane is more appropriate although its location close to the junction with Lower Hatfield Road is a concern. Nevertheless, this access has recently been relocated slightly further south from the junction which does improve matters slightly. A modest increase in pitches up to 15 might be acceptable (so long as sufficient parking and turning space is provided within the site), but an increase beyond this would result in real concerns around the free and safe flow of traffic at the Bayford Lane / Lower Hatfield Road junction. Another relocation of the access further south would overcome this concern, however, this may restrict visibility onto Bayford Lane to substandard levels. Traffic associated with Travelling Showpeople use is less appropriate at this site.</p>		
Accessibility to services:		
<p>The site is somewhat remote from sustainable transport infrastructure. No convenient access to bus services is in place, and there are no footways along adjacent public highways. However, Bayford Rail station is located approximately 2 kilometres away via relatively quiet rural roads which may be suitable for cyclists. The nearest GP is within 4 kilometres, the nearest primary school is within 2 kilometers, and there are shops within 3 kilometres.</p>		
Landscape Impacts		
<p>Existing site located in the Essendon-Brickendon Farmed Slopes LCA (landscape strategy is to improve and repair) on the edge of the Lea Valley, where settlement is typically limited, discreet and generally of a vernacular style. Land rises steeply to woodland to the south and some of this woodland lies within the southern part of the site. Additional land is available to the south west, which appears to be also steeply sloping, small scale pasture. The site is difficult to view with thick hedgerows along the northern and eastern road frontages, and woodland directly south of the existing site. The landscape structure of this area appears strong and this provides containment to the site. Further development within the existing site is unlikely to give rise to significant adverse landscape or visual effects as long as it avoids the woodland in the southern part. Expansion into the undeveloped land to the south west would be inappropriate as this is likely to lead to disruption to the sloping landform and erosion of character.</p>		

Green Belt Comments

The site lies within Green Belt. As such any further development beyond the permitted site boundary would lead to a reduction in openness and constitute an encroachment into open countryside.

Other Potential Impacts

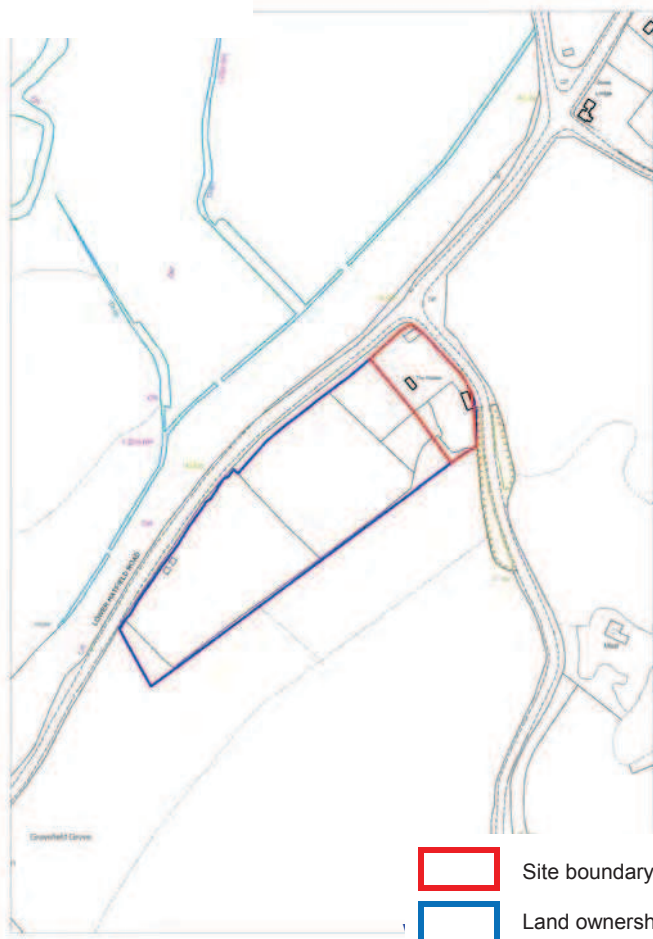
There are no known potential impacts.

ACHIEVABILITY

It appears the site could be intensified by the occupants within the existing, subject to licensing. The land is available, policy and physical constraints are capable of being overcome and mitigation measures are feasible subject to the ability of the owner to finance the development. The development appears to be viable.

Conclusion

This is an existing Gypsy and Traveller site which needs to be safeguarded. The existing permitted site is available and suitable for further intensification for two additional static caravans, which would not have any impact on the purposes of the Green Belt. Further development beyond the permitted site boundary would lead to an impact on the landscape and Green Belt purposes. The site is within the Green Belt and therefore there would require 'very special circumstances' to be established as part of a planning application or allocated within the District Plan for this site to come forward for Gypsy for Traveller use. The ANA has not identified a need from this site within the plan period, therefore potential capacity would not be required until after 2031.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	2
Potential occupants	
Irish Travellers only	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH002	Water Hall Quarry Complex	Letty Green
Site address	Local authority	Size (ha)
	East Herts Council	0.7
Description of site		
<p>The site is a quarry complex amounting to nearly 130 hectares divided into 5 parcels of land, located to the north and south of the B158 Lower Hatfield Road to the south west of Hertford. The site comprises land in active mineral extraction (Bunkers Hill Quarry), restored agricultural land (Pollards), woodland, land which is being restored (Southfield Wood and New Field), office and recycling facilities (adjacent to Water Hall Farm) and open lagoons.</p>		
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input checked="" type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location		
Planning history		
<p>The site has been in use for minerals extraction since the 1940s.</p>		
AVAILABILITY		
<p>The site was promoted to the Council for development in the Strategic Land Availability Assessment Call for Sites exercise. It was promoted primarily for potential uses including Gypsy and Traveller, Travelling Showpeople, community facilities, leisure/recreation, employment, renewable energy, mixed use or 'other'.</p>		
SUITABILITY		
Policy constraints		
<p>A small section of the central part of the site is within flood zone 2. Scheduled Ancient Monument is located on the eastern edge of the northern block of the site. There are a few Local Wildlife Sites designated across the site. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt</p>		
Physical constraints		
<p>Highways - Category: Amber: The site covers a large area of land which borders a relatively long section of Lower Hatfield Road, as well as sections of the wider public right of way network. The site has existing vehicle access both from the north and south onto Lower Hatfield Road. Lower Hatfield is a B classified secondary distributor road subject to a 60mph speed limit. Both of the main accesses into the sites are substandard in terms of visibility, with the northern access particularly limited. However, it must be acknowledged that these are established accesses with no recorded accident history at them over the past 5 years. Bearing in mind that the sites quarrying activities are now less intensive overall than previous years, a traveller development would be acceptable at this location so long as it does not increase the amount of traffic using the accesses to above that which has been permitted in past planning consents. Access to the site from other parts of the public highway and the wider right of way network are unlikely to be suitable. This is due to narrow carriageway widths, limited forward visibility on approach to the site, and limited scope to achieve sufficient visibility from access points into the site.</p>		
Accessibility to services:		
<p>The site is somewhat remote from sustainable transport infrastructure. No convenient access to bus services is in place, and there are no footways along adjacent public highways. However, Bayford Rail station is located in the vicinity of the southern section of the site and via relatively quiet rural roads which may be suitable for cyclists. The nearest GP is within 4 kilometres, the nearest primary school is within 2 kilometres, and there are shops within 4 kilometres.</p>		
Landscape Impacts		
<p>The landscape is very disrupted by the extraction operations, although these are surprisingly discreet within the wider landscape, and restoration of the worked areas appears to be quite recent so the landscape structure within those areas remains weak but will strengthen over time. The most accessible areas are those located near the B158 and the only scope for accommodating a Gypsy and Traveller site appears to be within an area that is already developed as part of the mineral workings set back to the north of the road adjoining an industrial estate, where a small development could be integrated.</p>		

Green Belt Comments

The site lies within Green Belt which prevents encroachment into the countryside and is relevant to the maintenance of separation between Hertford and Welwyn to the west. Development outside those areas that have already been developed with buildings as part of the mineral extraction operations would lead to a loss of openness and would not be appropriate. There is a programme of restoration as areas are worked out and the disruption resulting from extraction works to the openness of these areas will only be 'temporary'.

Other Potential Impacts

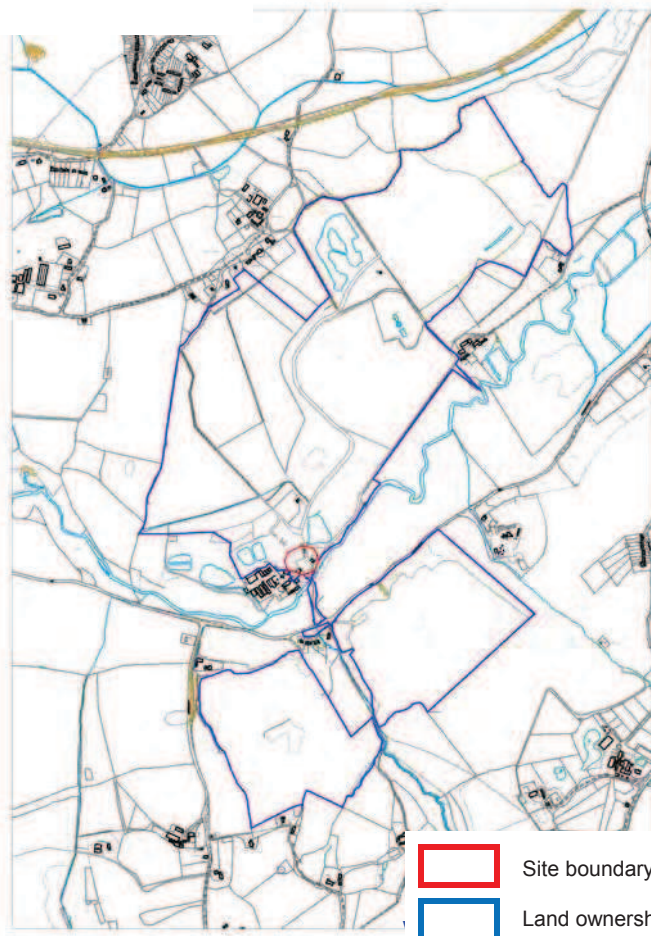
The site is currently (or has been used previously) for mineral extraction and therefore the previous use may have implications for developing the site for another use.

ACHIEVABILITY

There are potential costs for mitigation measures relating to landscaping and potential contamination/stability issues. There appear to be no reasons why the site could not be sold by the existing landowner for a private or public site. The land is potentially available, policy and physical constraints are capable of being overcome and mitigation measures are feasible subject to the ability of the owner to finance the development. The development appears to be viable.

Conclusion

The site is accessed via a working mineral plant and therefore is not potentially available in the short term. The site has been promoted for various uses including Gypsy and Traveller or Travelling Showpeople use and therefore deemed potentially available. The site is within the Green Belt and therefore there would need to be 'very special circumstances' or the Green Belt boundary would need to be redrawn for this site to come forward for Gypsy, Traveller or Travelling Showperson use.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	15
2029 - 2031	0
2031 +	0

Potential occupants
Gypsies and Travellers or Travelling Showpeople

Type of use
Residential

- Delivery model**
- Existing private site for either permanent authorisation, intensification or extension to meet family needs
 - Existing private site for intensification or extension to meet wider needs of communities
 - New private site for development
 - Existing public site for intensification or extension
 - New public site for development
 - New site to be developed as part of an urban extension
 - Existing site requiring planning permission

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Appendix G Assessment of Strategic Locations

Site ref	Site name	Settlement
EH034	Land South of Buntingford	Buntingford
Site address	Local authority	Size (ha)
London Rd	East Herts Council	10.2
Description of site		
<p>Land to the east of London Road, south of Windmill Hill (the former Sainsbury's Distribution Depot) is allocated as a residential-led mixed-use site to include approximately 300 homes by 2021. The site comprises a large redundant supermarket depot comprising a large employment shed and associated smaller buildings, accessed from a roundabout. It is located to the south of Buntington, adjacent existing to residential properties to the north west and open countryside to the east.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
<p>The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development. The site is adjacent to site EH008 land South of Owles lane which offers the opportunity to enlarge strategic site slightly to accommodate Gypsy, Traveller or Travelling Showpeople use without a net loss of housing provision and potentially development value.</p>		
SUITABILITY		
Policy constraints		
<p>Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt; BUNT3 Land South of Buntingford (allocation for 300 homes, employment uses and access serving Bury Football Club grounds by 2021).</p>		
Physical constraints		
<p>There are a number of existing buildings on site which would need to be demolished in any redevelopment of the site. Highways - The site is located to the east of London Road, south of Windmill Hill (on the former Sainsbury's Distribution Depot). The site is allocated as a residential-led, mixed-use site to include approximately 300 homes by 2021. The "Amber" rating for vehicular access in the previous EHC assessment is a general rating for all proposed development sites located within existing built-up areas in Hertfordshire. As a result, there are no major issues associated with vehicle access and the site is considered to be appropriate for Gypsy and Traveller. The existing vehicle access currently provides three exit lanes and multiple entry lanes to the roundabout, with good visibility in both directions. This is also considered to be appropriate for Travelling Showpeople and would also be able to accommodate larger vehicles associated with them.</p>		
Accessibility to services:		
<p>The nearest GP is 1.2 kilometres away, the nearest primary school is within 850 metres. The site is within 1.1 kilometres of the nearest shops. The nearest bus stop is 110 metres away. Watton-at-Stone train station is 11.6 kilometres away.</p>		
Landscape Impacts		
<p>The site is within the built up area of Buntingford and therefore is considered to have no additional landscape impact compared to the buildings already located on site. Strategy Supporting Document (Sieve 1: Area 9) - Landscape Character Scoring = Amber.</p>		

Green Belt Comments

The site is not within the Green Belt.

Other Potential Impacts

There are residential properties adjacent, to the north west of the site, although the redevelopment of the site has the potential to reduce the scale of the buildings compared to the buildings currently on site.

ACHIEVABILITY

There are a number of existing buildings on site which would need to be demolished which would add to the cost of the redevelopment of the site. Otherwise, there appears to be no reasons why a Gypsy and Traveller or Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available and has recently been submitted for a planning permission without Gypsy and Traveller provision, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy and Traveller or Travelling Showpeople site, subject to its wider development for residential. Capacity would need to be considered proportionate to the scale of development proposed in this location, however the Council may wish to consider a larger site in this non Green Belt location utilising a small part of the adjacent site (EH008). This would potentially allow sufficient land and an appropriate layout to enable the provision of a larger site without a reduction of housing provision and potentially development value.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
Potential occupants	
Gypsy and Travellers or Travelling Showpeople	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement	
EH037	Land East of Manor Links	Bishop's Stortford	
Site address		Local authority	Size (ha)
Manor Links		East Herts Council	6.2
Description of site			
This is an area of greenfield land located between a golf course and the existing urban area, on the eastern edge of Bishop's Stortford. Development of 150 homes will be provided between 2016 and 2021			
<input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location			
Planning history			
There is no known relevant planning history.			
AVAILABILITY			
The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.			
SUITABILITY			
Policy constraints			
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; BISH6 East of of Manor Links (allocation for 150 homes between 2016 and 2021)			
Physical constraints			
Highways - The development would consist of 150 homes and will be provided between 2016 and 2021. The previous EHC assessment notes that access could potentially be achieved via Haymeads Lane, Manor Links, Beldams Lane or the A1250 (Dunmow Road). All of these potential accesses would be able to accommodate Gypsy and Traveller vehicles which are largely similar to existing and proposed residential traffic. Therefore the site is considered suitable. However there may be potential issues associated with larger vehicles used by Travelling Showpeople as some of the potential access points are residential roads with a narrow carriageway and limited scope for widening (due to existing residential development and the scale of the proposed development that limits the potential for significant highways contributions). However access for Travelling Showpeople could be restricted to the other potential access points which can accommodate larger vehicles.			
Accessibility to services:			
The nearest GP is 1 kilometre away. The nearest primary school is within 500 metres. The site is within 1.6 kilometres of the nearest shops. The nearest bus stop is 200 metres away. Bishops Stortford train station is 1.2 kilometres away.			
Landscape Impacts			
Strategy Supporting Paper (area 3B) - This site is within a larger parcel of land assessed within the Paper. No assessment was undertaken for landscape impact. It would appear that the site would be acceptable for Gypsy and Traveller or Travelling Showpeople, if the site comes forward for residential development. There appears to be scope, as part of a well-considered masterplan, to accommodate some Gypsy and Traveller or Travelling Showpeople use within the development area.			

Green Belt Comments

Strategy Supporting Paper (area 3B) - Green Belt/Strategic Gaps = Red.
 Draft Green Belt Review (area 40) - This site is within a larger parcel of land assessed within the Green Belt Review. This parcel makes a 'significant contribution' to preventing neighbouring town and urban area (Stanstead Airport and motorway development and related infrastructure) from merging. The parcel either makes a 'contribution' or 'limited contribution' to the other purposes of the Green Belt. The Strategy Supporting Paper states 'this issue (strategic gap) is not considered to be significant enough to limit development.' Part 2 of the East Herts Green Belt Review identifies this site as potential Green Belt release. It is considered that the site is relatively well contained between the urban edge and golf course and in isolation is not considered provide a significant contribution to the purposes of the Green Belt.

Other Potential Impacts

The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of the existing properties.

ACHIEVABILITY

There appear to be no reasons why a Gypsy, Traveller or Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy and Traveller or Travelling Showpeople site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
Potential occupants	
Gypsies and Travellers	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH038	Land South of Bishops Stortford	Bishop's Stortford
Site address	Local authority	Size (ha)
(Sub Area A)	East Herts Council	54.1
Description of site		
<p>This is an area of greenfield land located between St James Way, Thorley Street and the existing urban area, on the southern edge of Bishop's Stortford. As part of the mixed-use development of this area, between 750 and 1,000 homes will be provided between 2016 and 2026.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.		
SUITABILITY		
Policy constraints		
<p>Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; BISH7 South of Bishop's Stortford (allocation for 750 homes or 1000 homes, employment land, and potentially a secondary school, between 2016 and 2021)</p>		
Physical constraints		
<p>Highways - The site is located on the southern edge of Bishop's Stortford. As part of the mixed-use development of this area (including a primary school, potentially a secondary school, a new district centre, and new employment area), between 750 and 1,000 homes will be provided between 2016 and 2026.</p> <p>It is noted that the HCC have raised an issue with this site due to modelling work that indicates a significant increase in congestion on London Road northbound, and additional delays on London Road / Stansted Road (the main north-south corridor). However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the traffic generated by the proposed development can be effectively managed or mitigated. The site is considered to be suitable for Gypsy and Traveller, as the provision of a number of traveller pitches within a development of up to 1000 dwellings is unlikely to have any noticeable impact on the highway network. The site is also considered to be suitable for Travelling Showpeople. The local road network provides a number of potential access points to the site that are likely to be able to accommodate larger vehicles associated with Travelling Showpeople. The development would also comprise commercial and employment land uses which are likely to generate larger vehicle movements. As a result, the additional larger vehicle movements generated by Travelling Showpeople would not adversely affect the local highway network.</p>		
Accessibility to services:		
The nearest GP is 1.6 kilometres away. The nearest primary school is within 400 metres. The site is within 800 metres of the nearest shops. There are two bus stops within the site boundary. Bishops Stortford train station is 1.6 kilometres away.		
Landscape Impacts		
<p>Strategy Supporting Paper (area 4A) - This site is within a larger parcel of land assessed within the Paper. Landscape score = Red. The site lies within the north eastern corner of the Thorley Uplands LCA (LCA 85).The site comprises a large tract of arable farmland the boundaries of which are defined on all sides by roads. Ribbon development extends along the eastern side, whilst the southern edge of the town has extended up to Obrey Way and Whittington Way along the northern boundary. The ring road defines the southern boundary. A small watercourse runs across the southern part of the site and the landform falls from the north and south towards this feature. A public footpath and the Hertfordshire Way cross the site. The landscape is broadly open with clear views across most parts; the land rising north of the stream up to the settlement edge, which is concealed beyond a strong line of vegetation, and provides a clear rural setting on this edge of the town. There is no perception of the town beyond when viewed from the south.</p>		

Green Belt Comments

Strategy Supporting Paper (area 4A) - Green Belt = Red. Draft Green Belt Review (area 36) - This site is within a larger parcel of land assessed within the Green Belt Review. The site lies on the south western edge of Bishops Stortford and comprises all of Sub-Area A (Area 04), which is divided into three parcels, identified in the GBR. The GBR notes that the Area does assist with checking sprawl having retained openness and safeguarding the countryside from encroachment. It is not considered to provide any contribution to preventing merging with the nearest town (Sawbridgeworth) but does prevent merging with the village of Thorley. It is not regarded as fulfilling the purpose of preserving the setting and special character of the historic town. Due to the nature of the Area there is no opportunity to release only part of this site; it is 'all or nothing'. If this Area were to be released from the Green Belt it would extend the urban area into an open and prominent landscape and lead to a very clear perception of encroachment and reduction in openness. It would provide a long term expansion area for the town and there would clearly be scope to accommodate G&T development as part of a well-defined masterplan. However, if the site is retained in Green Belt there appears to be no locations that may accommodate a small G&T development without breaching clear boundaries and giving rise to conflict with Green Belt purposes (primarily encroachment into countryside) and adverse landscape and visual effects

Other Potential Impacts

The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of existing properties.
Potential impacts on the views and vistas, in particular those relating to Thorley Church.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a medium size Gypsy and Traveller or Travelling Showpeople site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
Potential occupants	
Gypsies and Travellers or Travelling Showpeople	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH039	Land North of West Road (West of Sawbridgeworth)	Sawbridgeworth
Site address	Local authority	Size (ha)
Land north of West Road	East Herts Council	5.9
Description of site		
Land to the north of West Road is allocated as a residential development site, to accommodate approximately 100 homes by 2021. This is an area of greenfield land located between the countryside and the existing urban area, on the western edge of Sawbridgeworth. It is located adjacent to a football ground, primary school and existing residential properties.		
<input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.		
SUITABILITY		
Policy constraints		
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; SAWB2 Land North of West Road (West of Sawbridgeworth) (allocation for 100 homes and educational uses, by 2021)		
Physical constraints		
<p>Highways - Land to the north of West Road is allocated as a residential development site, to accommodate approximately 100 homes by 2021. It is noted that the Red rating by the EHC for Highways Infrastructure is for the combined impacts of both of the sites (SAWB2 and SAWB3) located on West Road, and recommends a Sawbridgeworth Bypass to mitigate traffic generated for development above 500 dwellings. However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the required Highways Infrastructure can be constructed. The site is considered to be suitable for Gypsy and Traveller, as the vehicle trips generated by Gypsies and Travellers are likely to be similar to the general residential vehicle trips, and would not cause any significant adverse impacts on the local road network.</p> <p>The site is not considered to be suitable for Travelling Showpeople. West Road has a narrow carriageway that would not be able to accommodate larger vehicles associated with Travelling Showpeople. There is limited scope for widening the carriageway of West Road due to existing residential development and topography.</p>		
Accessibility to services:		
The nearest GP is 550 metres away. The nearest primary school is within 50 metres. The site is within 650 metres of the nearest shops. The nearest bus stop is 25 metres away. Sawbridgeworth train station is 1.1 kilometres away.		
Landscape Impacts		
Strategy Supporting Paper (area 16A) - This site is within a larger parcel of land assessed within the Paper. Landscape Character Scoring = Red. The site lies within the southern edge of the Thorley Uplands LCA (LCA 85). It consists of an irregular sided gently sloping arable field which is quite open and exposed to the gently undulating largely open rural landscape to the west/north west. The eastern boundary is reasonably well vegetated and this provides a softened edge along the edge of the settlement with the school, houses and football ground reasonably well contained beyond. This edge therefore limits the influence of the urban area and avoids any particular sense of encroachment of the settlement into the adjoining countryside. A public footpath runs along the north eastern and northern boundaries.		

Green Belt Comments

Strategy Supporting Paper (area 16A) - Green Belt = Red. Draft Green Belt Review (area 34) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Contribution' to all purposes of the Green Belt. The site lies on the western edge of Sawbridgeworth and comprises parcel 09D in Sub-Area A (Area 13) identified in the GBR. The GBR notes that the parcel performs reasonably well in terms of checking sprawl, provides no contribution to preventing the merger of towns (and a limited contribution to merging with neighbouring village, and assists in safeguarding countryside, that is recognised in the LCA as being in good condition, from encroachment. Although relatively featureless the site has a strong rural character forming part of the gently undulating broadly open landscape that extends around the western side of the settlement. Although it abuts the settlement this is reasonably well contained and development within this site would undoubtedly appear as a significant encroachment into the countryside to the very insignificant boundary of the small watercourse (the GBR accepts this as being weak); the sloping nature of the site would also make it difficult to integrate. If the site is selected for release from the Green Belt to accommodate development there may be some scope to accommodate a small G&T development as part of the masterplan.

Other Potential Impacts

The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of existing properties.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy and Traveller site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
Potential occupants	
Gypsies and Travellers or Travelling Showpeople	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH040	Land South of West Road (West of Sawbridgeworth)	Sawbridgeworth
Site address	Local authority	Size (ha)
Land to the south of West Road	East Herts Council	14.1
Description of site		
Land to the south of West Road is allocated as a residential development site, to accommodate approximately 300 homes by 2021. This is an area of greenfield land located in the countryside and adjacent to the existing urban area, on the western edge of Sawbridgeworth. It is adjacent to existing residential properties to the east and north of the site.		
<input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.		
SUITABILITY		
Policy constraints		
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; SAWB3 Land to the south of West Road (West of Sawbridgeworth) (allocation for 300 homes and retail, by 2021)		
Physical constraints		
Highways - Land to the south of West Road is allocated as a residential development site, to accommodate approximately 300 homes by 2021. It is noted that the previous EHC assessment provided a "Red" rating for Highways Infrastructure for development above 500 dwellings. This is due to the combined impacts of both of the sites (SAWB2 and SAWB3) located on West Road, and recommends a Sawbridgeworth Bypass to mitigate traffic issues. However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the required Highways Infrastructure can be constructed. The site is considered to be suitable for Gypsies and Travellers, as the vehicle trips are considered to be similar in nature to general residential vehicle trips generated by the development, and would not cause any significant adverse impacts on the local road network. The site is not considered to be suitable for Travelling Showpeople. West Road has a narrow carriageway that would not be able to accommodate larger vehicles associated with Travelling Showpeople. There is limited scope for widening the carriageway of West Road due to existing residential development and topography.		
Accessibility to services:		
The nearest GP is within 450 metres. The nearest primary school is within 250 metres. The site is within 550 metres of the nearest shops. The nearest bus stop is 50 metres away. Sawbridgeworth train station is 1.2 kilometres away.		
Landscape Impacts		
Strategy Supporting Paper (area 16B) - This site is within a larger parcel of land assessed within the Paper. Landscape Character Scoring = Green. The site lies within the High Wych Slopes LCA (LCA 84). The site consists of one large and one smaller arable field falling gently east towards a small tree-lined watercourse which defines the limit of the settlement; this vegetation combined with a triangular open space at the northern end south of west Road forms a soft and well-defined edge to the existing settlement, beyond which lies residential estate development. A row of houses (within Green Belt) adjoins the southern side of West Road on the northern boundary. A small builders' yard lies just beyond the north western corner of the site. A public footpath runs along the southern boundary of the site and some listed buildings lie which lie within Green Belt within a small area east of the stream, adjoined on three sides by development.		

Green Belt Comments

Strategy Supporting Paper (area 16B) - Green Belt = Red. Draft Green Belt Review (area 33) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Contribution' or 'Limited Contribution' to all purposes of the Green Belt. The site lies on the western edge of Sawbridgeworth and comprises parcel 10B in Sub-Area A (Area 14) identified in the GBR. The GBR considers that the parcel performs reasonably well in terms of checking sprawl due to its openness, provides a 'critical' contribution to preventing the merging of the town with the village of High Wych to the south west and where there are no alternative strong boundaries that could provide a new robust Green Belt boundary. The assessment considers that the parcel does not provide a particular contribution to safeguarding the countryside from encroachment although this view is not shared by this assessment (see below). The GBR identifies the parcel as a recommended option for development. However, significant local landscape and visual implications are likely to arise from development. Development would represent a very obvious reduction in openness and perception of 'sprawl' due to the open nature of the landscape and the way in which development would extend (or protrude) beyond the clearly defined existing settlement boundary; furthermore there are no other robust defensible boundaries that would be suitable to define the new Green Belt edge (both points are recognised in the GBR). However, if the site were to be released for development there is most likely to be scope to accommodate a G&T development as part of a considered development masterplan.

Other Potential Impacts

Residential amenity of properties adjacent, to the south of the site.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy and Traveller site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location.



Site boundary
 Land ownership

DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
Potential occupants	
Gypsies and Travellers or Travelling Showpeople	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement	
EH043	North of Hertford	Hertford	
Site address		Local authority	Size (ha)
Land between Sacombe Road and Wadesmill Road		East Herts Council	6.0
Description of site			
Development of 150 homes will be provided between 2021 and 2026 to the west of B158 Wadesmill Road/north of Sacombe Road. This is an area of greenfield land and previously developed land, which was previously a nursery, located between the open countryside, allotments and the existing urban area. The remaining part of the site are open agricultural fields on the northern edge of Hertford.			
<input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location			
Planning history			
There is no known relevant planning history.			
AVAILABILITY			
The agents have confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.			
SUITABILITY			
Policy constraints			
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; HERT4 North of Hertford (allocation for 150 homes between 2021 and 2026);			
Physical constraints			
Highways - District Plan identifies development of 150 homes will be provided between 2021 and 2026 to the west of B158 Wadesmill Road / north of Sacombe Road. It is noted that the previous EHC and HCC assessments rated this site Red due to the likelihood that the development would cause significant additional traffic into Hertford and significant extra pressure on Bengeo, which already suffers congestion into the town at peak times. The B158 (particularly around Old Cross, Port Hill and the new Sainsbury's) is a particular pinch-point for congestion and it is unlikely that road upgrades would be able to cope with the cumulative effects. However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the required Highways Infrastructure can be constructed and the congestion issues mitigated. The site is considered to be suitable for Gypsy and Traveller. The impact of vehicle trips generated by Gypsies and Travellers would not cause any significant adverse impacts on the local road network as they are largely similar to the existing and proposed residential vehicle trips. The site is also reasonably accessible to sustainable transport modes and it is likely that the development would require an increase in bus service frequencies in the local area. The site is also considered to be suitable for Travelling Showpeople, as the existing (and upgraded) local road network is likely to be able to accommodate a number of larger vehicles accessing the site. The phasing of development will need to ensure that underlying mineral deposits in the locality can be satisfactorily extracted.			
Accessibility to services:			
The nearest GP is 1.5 kilometres away. The nearest primary school is within 200 metres. The site is within 1.6 kilometres of the nearest shops. The nearest bus stop is within 200 metres. Hertford North train station is 1.5 kilometres away.			
Landscape Impacts			
Strategy Supporting Paper (area 12C) - This site is within a larger parcel of land assessed within the Paper. Landscape Character Scoring = Amber. The site lies within the Stonyhills LCA (LCA 69). Parcel 07D is currently a nursery with allotments to the south (parcel 07E). The northern parts are part of an extensive tract of elevated open, sloping and visually exposed arable land located on the western upper slopes of the Rib valley form which there are extensive and far reaching views. The northern boundary of the site is an arbitrary line struck across this open landscape.			

Green Belt Comments

Strategy Supporting Paper (area 12C) - Green Belt = Red. Draft Green Belt Review (area 9) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Significant Contribution' to assisting in safeguarding the countryside from encroachment. It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt. The site lies on the northern edge of the town and occupies parcel 07D and southern parts of parcels 07A and 07C within Hertford Sub-Area C (Area 07) identified in the GBR. The Green Belt boundary is well defined in this location along existing boundaries. No clear robust boundaries exists further north and the northern site boundary is arbitrary and not a suitable location for a realigned Green Belt boundary. It is therefore recommended that the site remains in Green Belt. The nursery is the only part of the site that is reasonably contained and could accommodate a Gypsy and Traveller development (within Green Belt) without wider landscape and visual harm. Such development being low rise would also minimise impact. As the site is already partially developed, some development would not give rise to a perception of encroachment and there are opportunities to strengthen the existing partially hedged boundaries.

Other Potential Impacts

The site is adjacent to allotments and existing residential properties, therefore any development could impact on the amenity of the allotments or existing properties.

ACHIEVABILITY

There appear to be no reasons why a Gypsy, Traveller or Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy, Traveller or Travelling Showpeople site, subject to its wider development and release of the whole site from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location and reflect the potential landscape/Green Belt impacts development may have beyond the nursery element of the site .



Site boundary
 Land ownership

DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
Potential occupants	
Gypsies and Travellers or Travelling Showpeople	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH045	Land West of Hertford (South of Welwyn Road)	Hertford
Site address	Local authority	Size (ha)
Land south of Welwyn Road	East Herts Council	8.8
Description of site		
<p>The strategic site is proposed to provide 250 homes to the south of Welwyn Road/west of Thieves Lane by 2021. This is an area of greenfield land located between the open countryside and the existing urban area, on the southern edge of Hertford.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
<p>There is no known relevant planning history.</p>		
AVAILABILITY		
<p>The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.</p>		
SUITABILITY		
Policy constraints		
<p>Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; ENV14 Local Sites; BH16 Historic Parks and Gardens Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; HERT3 West of Hertford (allocation for 250 homes by 2021); Policy HA8 Historic Parks and Gardens; Policy NE1 International, National and Locally Designated Nature Conservation Sites Local Wildlife Site located to the west and south of the site. Historic Park and Garden located to the south of the site.</p>		
Physical constraints		
<p>Highways -The development is proposed to consist of 250 homes to the south of Welwyn Road/west of Thieves Lane. The development of the site was rated Red by the HCC due to impacts on the A414. However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the additional vehicle trips generated and congestion issues can be mitigated. The site is considered to be suitable for Gypsies and Travellers as the trips generated are likely to be similar to the existing and proposed residential vehicle trips, and would not cause any significant adverse impacts on the local road network. The site is also considered to be accessible by sustainable modes as the District Plan outlines improvements to the walking and cycling environment, and new bus stops and shelters. The site is also considered to be suitable for Travelling Showpeople, as the local road network is likely to be able to accommodate a number of larger vehicles accessing the site.</p>		
Accessibility to services:		
<p>The nearest GP is 1.6 kilometres away. The nearest primary school is within 250 metres. The site is within 1.9 kilometres of the nearest shops. There are two bus stops within the site boundary. Hertford North train station is within 800 metres of the site.</p>		
Landscape Impacts		
<p>Strategy Supporting Paper (area 11B) - This site is within a larger parcel of land assessed within the Paper. Scoring = Amber. The site lies within the Panshager Parkland LCA (LCA 44). It forms a broadly rectangular arable field with a narrow 'arm' of pasture (parcel 06D) to the north west; the western and southern sides are defined by the large block of Blakemore Wood (Ancient Woodland); the land is elevated, broadly level but falling gently at the southern end. It is open to view from Welwyn Road to the north and Thieves Lane to the east, where existing development forms a defined and reasonably prominent edge which contrasts strongly with the rural character of the site and the backdrop of woodland. From a landscape and visual perspective, the site lies within the visual envelope of the town which is defined by the outlying woodland; the separation provided by the adjoining road and productive agricultural use means the site has a largely intact rural character and there is a clear distinction between town and country. G&T development on its own would be inappropriate in this location but, if the area is to be released from Green Belt, there appear to be no obvious constraints to the incorporation of some G&T development as part of a considered masterplan.</p>		

Green Belt Comments

Strategy Supporting Paper (area 11B) - Green Belt = Red. Draft Green Belt Review (area 17) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Significant Contribution' to assist in safeguarding the countryside from encroachment. It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt. The site lies on the immediate south western edge of the town and occupies parcels 06D and F within Hertford Sub-Area A (Area 06) identified in the GBR. The GBR identifies most of Area 06 as playing an important role in restricting sprawl, providing little contribution to preventing the merger of towns (and also villages), and assisting in safeguarding countryside from encroachment.

Other Potential Impacts

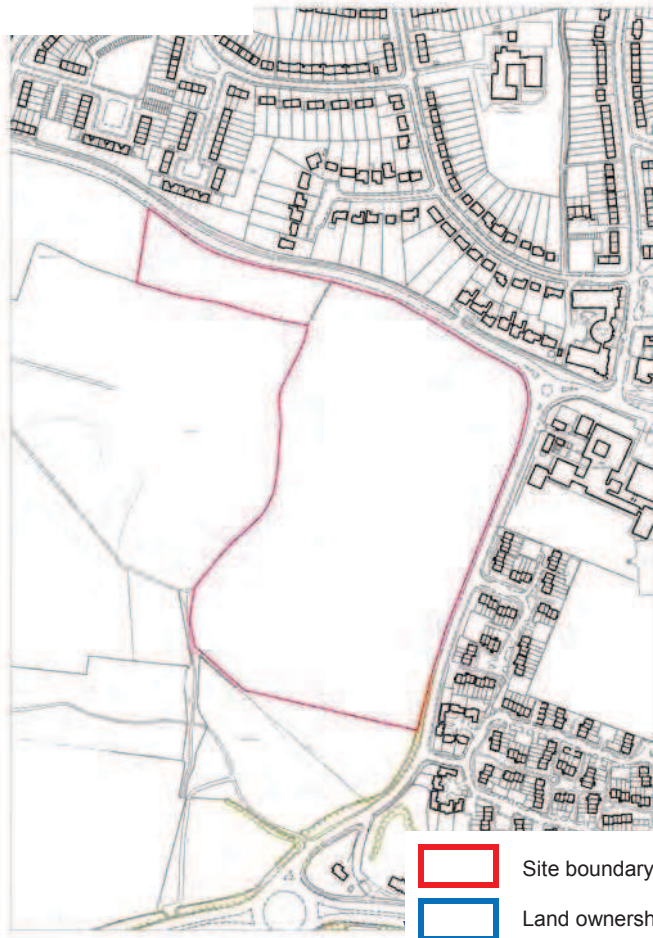
Residential amenity of properties adjacent, to the north and east, of the site.
Potential impacts on ecology and historic environment, in relation to the Local Wildlife Site and Panshanger Country Park.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller/Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy, Traveller or Travelling Showpeople site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location. Alternatively it may be sensible to combine provision across both West of Hertford sites (EH045 and EH044) to provide a single site with 6 pitches/plots.



Site boundary
 Land ownership

DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
Potential occupants	
Gypsies and Travellers or Travelling Showpeople	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH051	Land West of Hertford (North of Welwyn Road)	Hertford
Site address	Local authority	Size (ha)
North of Welwyn Road	East Herts Council	11.9
Description of site		
<p>The strategic site is proposed to provide 300 dwellings to the north of Welwyn Road by 2021. This is an area of greenfield land located in the open countryside and adjacent to the existing urban area, on the western edge of Hertford.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input checked="" type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input type="checkbox"/> Source: broad location </p>		
Planning history		
<p>There is no known relevant planning history.</p>		
AVAILABILITY		
<p>The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.</p>		
SUITABILITY		
Policy constraints		
<p>Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; ENV14 Local Sites; BH16 Historic Parks and Gardens Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; HERT3 West of Hertford (allocation for 300 homes by 2021); Policy HA8 Historic Parks and Gardens; Policy NE1 International, National and Locally Designated Nature Conservation Sites Local Wildlife Site located within the site. Historic Park and Garden located close to the south western corner of the site.</p>		
Physical constraints		
<p>Highways - The development proposes 300 dwellings to the north of Welwyn Road. The development of the site was rated Red by the HCC due to impacts on the A414. However for the purposes of assessing the suitability of the site for Gypsy Traveller and Travelling Showpeople, it is assumed that the additional vehicle trips generated and congestion issues can be mitigated. The site is considered to be suitable for Gypsies and Travellers as the trips generated are likely to be similar to the existing and proposed residential vehicle trips, and would not cause any significant adverse impacts on the local road network. The site is also considered to be accessible by sustainable modes as the District Plan outlines improvements to the walking and cycling environment, and new bus stops and shelters. The site is considered to be suitable for Travelling Showpeople, as the local road network is likely to be able to accommodate a number of larger vehicles accessing the site</p>		
Accessibility to services:		
<p>The nearest GP is 2.1 kilometres away. The nearest primary school is within 500 metres. The site is within 2.4 kilometres of the nearest shops. There are three bus stops within the site boundary. Hertford North train station is within 1.4 metres of the site.</p>		
Landscape Impacts		
<p>Strategy Supporting Paper (area 11A) - This site is within a larger parcel of land assessed within the Paper. Scoring = Red. The site lies within the Bramfield Plain LCA (LCA 67) and appears to have been subject of gravel extraction which has been poorly restored such that it is now unmanaged rough grassland. To the north west lies a large area of woodland which defines the upper edge of a local valley which falls away to the north/north west. The field structure appears to have been retained and a triangular field in the north western part of the site is defined by a strong tree belt on the eastern side and is an identified wildlife site. The southern boundary is delineated by a hedge along Welwyn Road, whilst the eastern boundary forms a harsh edge with residential development on the edge of the town. This open relationship with the built up area and the unmanaged 'abandoned' nature of the site detracts from its character. In visual terms the broadly level elevated location of the site benefits from substantial containment provided by the woodland to the north west, vegetation along Welwyn Road and large woodlands beyond, and the adjoining development. In landscape and visual terms this site offers scope for accommodating development and there appear to be no obvious constraints to the incorporation of some G&T development as part of a considered masterplan in this location.</p>		

Green Belt Comments

Strategy Supporting Paper (area 11A) - Green Belt = Amber.
 Draft Green Belt Review (area 7) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Contribution' or 'Limited Contribution' to all purposes of the Green Belt. The site lies on the immediate western edge of the town and occupies parcels 05A-C within Hertford Sub-Area A (Area 05) identified in the Green Belt Review. The GBR identifies Area 05 as playing an important role in restricting sprawl, providing little contribution to preventing the merger of towns (and also villages), and assisting in safeguarding countryside from encroachment. The woodland and road form possible logical long term defensible boundaries, compared with the poorly defined edge that currently exists.

Other Potential Impacts

The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of existing properties.
 Potential impacts on ecology and historic environment, relating to the Local Wildlife Site and Panshanger Country Park. The area designated as Local Wildlife Site within the site is not suitable for Gypsy and Traveller use.

ACHIEVABILITY

There appear to be no reasons why a Gypsy, Traveller or Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy, Traveller or Travelling Showpeople site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield	
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
Potential occupants	
Gypsies and Travellers	
Type of use	
Residential	

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Appendix H Assessment of Broad Locations

Site ref	Site name	Settlement
EH053	Gilston area	Harlow
Site address	Local authority	Size (ha)
	East Herts Council	712.6
Description of site		
<p>The broad location is located across the Stort Valley approximately 500 metres from the edge of Harlow at the nearest point, close to Harlow Town railway station and the employment areas and town centre of Harlow. It is characterised by an area of undulating countryside with a number of features including small streams, woods, hedgerows, and at the centre the landscaped bowl of Gilston Park. The boundary for the broad location is yet to be defined.</p>		
<p> <input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input checked="" type="checkbox"/> Source: broad location </p>		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
The agents have confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.		
SUITABILITY		
Policy constraints		
<p>The majority of the site, to the southern part of the broad location, is within the Green Belt. Small parts of the site are designated flood zones 2 and 3, Local Wildlife Sites and Scheduled Ancient Monuments. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; ENV14 Local Sites; BH1 Archaeology & New Development. Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; DPS3 Housing Supply 2011-2031 (Broad Location - approximately 3000 homes (2011 - 2031+)); DPS4 Broad Locations for Development; Policy NE1 International, National and Locally Designated Nature Conservation Sites; Policy HA3 Archaeology. Policy GA1 sets out the development requirements for the broad location.</p>		
Physical constraints		
<p>Highways - The proposed development area is a "broad location" to the north of Harlow, around Gilston. This would be a mixed-use development (including a primary school, secondary school, new district centre, and new employment area), providing 5,000 – 10,000 dwellings. It is anticipated that development could commence on site towards the beginning of the 2021-26 period, continuing beyond the timescale of the District Plan (2031). Hence it is estimated that only 3,000 of the overall headline housing anticipated may be complete by 2031, with the site continuing to supply a pipeline of future housing to address local need going forward from 2031 onwards. It is noted that the previous EHC and HCC assessment gave the proposed development a "Red" rating due to the significant highways infrastructure required to enable the development and the significant number of additional trips that would be generated by upto 10,000 dwellings. However, if the issues related to the transport impacts of 10,000 dwellings could be fully mitigated to allow development, then it is unlikely that the addition of Gypsy, Traveller and/or Travelling Showpeople within the site would cause any noticeable issues, providing that a suitable vehicle access can be achieved. As a result, the site is considered suitable. Small areas of the site are within flood zone 2 and 3.</p>		
Accessibility to services:		
There are several bus stops within the site boundary. Harlow Town train station is within 650 metres. The nearest GP is within 2 kilometres, the nearest primary school is within 1 kilometre, and there are shops within 3.5 kilometres.		
Landscape Impacts		
<p>Strategy Supporting Paper (area 69) - The general area, where this broad location is identified, as assessed for a new settlement in the Hunsdon Area. Scoring = Amber. 'The landscape in this corridor is divided on a north-south axis in several locations by watercourses. Despite this, the landscape is gently undulating rather than creased with valleys and ridges.'</p> <p>The area lies within the Stanstead and Pishiobury Parklands LCA (LCA 81). It extends across the rounded and folded northern valley slopes which possess a reasonably complex and varied landscape character, including parklands, that provides an attractive and contrasting rural northern hinterland to the town. There are some small settlements (Gilston and Eastwick) and scattered farmsteads. Whilst there is a visual inter-relationship with the northern fringes of the town the landscape has a strong rural character and the separation from the town is enhanced by the river valley and the A414 (from which there are views into the area). The northern edge of the Green Belt is weakly defined along field boundaries, minor lanes and watercourses.</p> <p>It is difficult to see how the northward expansion of the town into this sensitive area could be achieved without significant landscape and visual harm; furthermore the opportunities for achieving connectivity with the existing urban area are constrained by the floodplain.</p>		

Green Belt Comments

2/3 of the southern part of the site is within the Green Belt.
 Strategy Supporting Paper (area 69) - Green Belt = Amber.
 Draft Green Belt Review (area 28 and 30) - This site is within a 2 larger parcels of land assessed within the Green Belt Review. The parcels makes a 'Contribution' or 'Limited Contribution' to all purposes of the Green Belt.
 This broad location falls within the northern edge of the Green Belt north of Harlow but separated from it by the floodplain of the River Stort. The area was not evaluated as part of the GBR. The river floodplain and transport corridors have defined the northern limit of the town and primarily prevented encroachment into the area beyond, although Green Belt designation has clearly also constrained the prospect of expansion ('sprawl') in this direction. The land does not fulfil the purpose of preventing towns merging.

Other Potential Impacts

There are a number of existing residential properties within the broad location, and any development could impact on the residential amenity of existing properties.
 Potential impact on Scheduled Ancient Monuments and Local Wildlife Sites within the broad location.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller/Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a a large Gypsy, Traveller or Travelling Showpeople site, subject to its wider development. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement	
EH054	North and East of Ware	Ware	
Site address		Local authority	Size (ha)
		East Herts Council	47.0
Description of site			
The Broad location to the North and East of Ware is identified as a Broad Location for Development and delivery after 2021 of between 200 and 3,000 dwellings, subject to further testing through masterplanning, assessing viability and infrastructure planning. This is a large area of agricultural land located to the north and east of Ware. The boundary for the broad location is yet to be defined.			
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input checked="" type="checkbox"/> Source: broad location			
Planning history			
There is no known relevant planning history.			
AVAILABILITY			
The agents have confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.			
SUITABILITY			
Policy constraints			
Small areas of designated open space in the northern part of the broad location. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; LRC1 Sport and Recreation Facilities. Policy BH16 of the adopted Local Plan identifies two registered historic gardens in the locality at Poles Park (Hanbury Manor) and Fanhams Hall. Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; DPS3 Housing Supply 2011-2031 (Broad Location - approximately 1800 homes across sites North and East of Ware (2011 - 2031+)); DPS4 Broad Locations for Development; CFLR1 Open Space, Sport and Recreation. Policy WARE3 sets out the development requirements for this Broad Location.			
Physical constraints			
Highways - The proposed development area is a "broad location" to the east of Ware. Due to the scale of the potential development, a Development Plan Document would be required (in conjunction with site EH055 – refer to below). The proposed development area would accommodate between 200 and 3,000 dwellings (across both the EH054 and EH055 sites). It is noted that the previous EHC and HCC assessment gave the proposed development a "Red" or "Amber" rating due to the serious access limitations and the significant number of additional trips that would be generated by upto 3,000 dwellings. However, if the transport impacts related to the development of 3,000 dwellings could be fully mitigated to allow development, than it is unlikely that the addition of Gypsy, Traveller and or Travelling Showpeople. Within the site would cause any noticeable issues, providing that a suitable vehicle access can be achieved. As a result, the site is considered suitable for both Gypsy, Traveller and or Travelling Showpeople.			
Accessibility to services:			
The site is within 100 metres of a bus stop and 1.1 kilometres of Ware train station. The nearest GP is within 1.1 kilometres, the nearest primary school is within 100 metres, and there are shops within 1.2 kilometres.			
Landscape Impacts			
Strategy Supporting Paper (area 20A) - This site is within a larger parcel of land assessed within the Paper. Scoring = Red The broad Location lies within the Wareside-Braughing Uplands LCA (LCA 89). There is a reasonably strong landscape structure in the areas identified. Subject to the extent of the broad location consideration to the impact of development for Gypsy, Traveller and/or Travelling Showpeople on the two registered historic gardens will need to be considered.			

Green Belt Comments

Strategy Supporting Paper (area 20A) - Green Belt/Strategic Gaps = Red.

Draft Green Belt Review (area 13) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Significant Contribution' to check the unrestricted sprawl of large built-up areas. It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt.

This area lies on the northern and eastern edge of Ware and comprises Sub-Area B (Area 13) and Sub-Area A (Area 14) identified in the GBR, which is broken down into numerous parcels. The parcels identified as contributing least to purposes and therefore identified for possible release do appear to offer opportunities to accommodate development that is well related to the settlement and may have limited adverse landscape and visual effects. There appear to be opportunities to establish realign the Green Belt boundary along existing features, which could be strengthened as part of the proposals.

Other Potential Impacts

There are a number of existing residential properties within the broad location, and any development could impact on the residential amenity of existing properties.

There are a couple of small areas designated for open space within the broad location.

There are a number of constraints, such as the historic environment and local wildlife sites which would not be suitable for Gypsy and

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller/Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a large Gypsy, Traveller or Travelling Showpeople site, subject to its wider development. Capacity of 15 pitches is considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Site ref	Site name	Settlement
EH055	East of Welwyn Garden City	Welwyn Garden City
Site address	Local authority	Size (ha)
	East Herts Council	148.3
Description of site		
This is a large area of agricultural land located to the east of Welwyn Garden City. The boundary for the broad location is yet to be defined.		
<input type="checkbox"/> Source: current unauthorised <input type="checkbox"/> Source: strategic site <input type="checkbox"/> Source: public owned land <input type="checkbox"/> Source: current authorised <input type="checkbox"/> Source: site survey <input type="checkbox"/> Source: call for sites <input type="checkbox"/> Source: privately promoted <input checked="" type="checkbox"/> Source: broad location		
Planning history		
There is no known relevant planning history.		
AVAILABILITY		
The agents have confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpeople use. Delivery would require the Council to make provision a policy requirement of development.		
SUITABILITY		
Policy constraints		
The broad location is on the local authority boundary with Welwyn Garden City, and any development in this location would be required to meet the housing needs of the city. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; ENV14 Local Sites; BH16 Historic Parks and Gardens. Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; DPS3 Housing Supply 2011-2031 (Broad Location - approximately 1800 homes East of Welwyn Garden City; DPS4 Broad Locations for Development; Policy HA8 Historic Parks and Gardens; Policy NE1 International, National and Locally Designated Nature Conservation Sites. Policy EWEL1 sets out the development requirements for this Broad Location.		
Physical constraints		
<p>Highways - The proposed development area is a "broad location" to the east of Welwyn Garden City. The site would provide a new district centre, a new employment area, a primary and a secondary school and would accommodate 1,700 dwellings. The previous EHC assessment did not identify any issues in terms of highways infrastructure requirements and potential vehicle access. However, the previous HCC assessment provided a "Red" rating due to the significant amount of additional traffic that would be generated by 1,700 dwellings.</p> <p>However, if the transport impacts generated by 1,700 dwellings could be fully mitigated to allow development, than it is unlikely that the addition of Gypsy, Traveller and/or Travelling Showpeople within the site would cause any noticeable issues. As a result, the site is considered suitable for both uses.</p>		
Accessibility to services:		
There is a bus stop within the site boundary and Welwyn Garden City train station is 1.6 kilometres away. The nearest GP is within 1.2 kilometres, the nearest primary school is within 850 metres, and there are shops within 3.5 kilometres.		
Landscape Impacts		
<p>Strategy Supporting Paper (area 61) - This site is within a larger parcel of land assessed within the Paper. Scoring = Green</p> <p>The broad location falls within the Welwyn Fringes LCA (LCA 45) and comprises an extensive tract of land on the eastern side of the built up area, the boundaries of which are generally well defined by woodland and robust tree belts such that there is a clear distinction and threshold between the town and its rural hinterland. This separation has ensured that the rural character of this area is not reduced by the proximity of the town; the land makes a significant contribution to the perception of the Garden City's rural context and setting. A large landfill operation lies south of the B195 Birchall Lane.</p>		

Green Belt Comments

Strategy Supporting Paper (area 61) - Green Belt = Red. 'The area is designated Green Belt, but there are clear boundary limits provided by the A414 and Panshanger Lane, and the distance of over 3km between the edge of this location and Hertford is sufficient to maintain a robust buffer against coalescence. Existing woodland would screen development here when viewed from most directions.'

Draft Green Belt Review (area 16 and 17) - This site is within 2 larger parcels of land assessed within the Green Belt Review. The parcels makes a 'Significant Contribution' to check the unrestricted sprawl of large built-up areas (16) and assist in safeguarding the countryside from encroachment (17). It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt. This site lies on the eastern edge of Welwyn and comprises Area 15 identified in the GBR which is broken down into numerous parcels. The area identified in the GBR as a recommended option for Green Belt release comprises parcels 15C, 15G and 15H. Should the area be considered further and be identified for growth the scale of development is likely to provide opportunities to accommodate Gypsy, Traveller and Travelling Showpeople development as part of a well-conceived masterplan..

Other Potential Impacts

Potential impacts on the historic environment and local wildlife sites.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller/Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. There are a number of constraints, such as the historic environment and local wildlife sites, which would not be suitable for Gypsy and Traveller development, but policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a large Gypsy, Traveller or Travelling Showpeople site, subject to its wider development. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield

2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0
2031 +	0

Potential occupants

Gypsies and Traveller or Travelling Showpeople

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

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Appendix I Design Templates

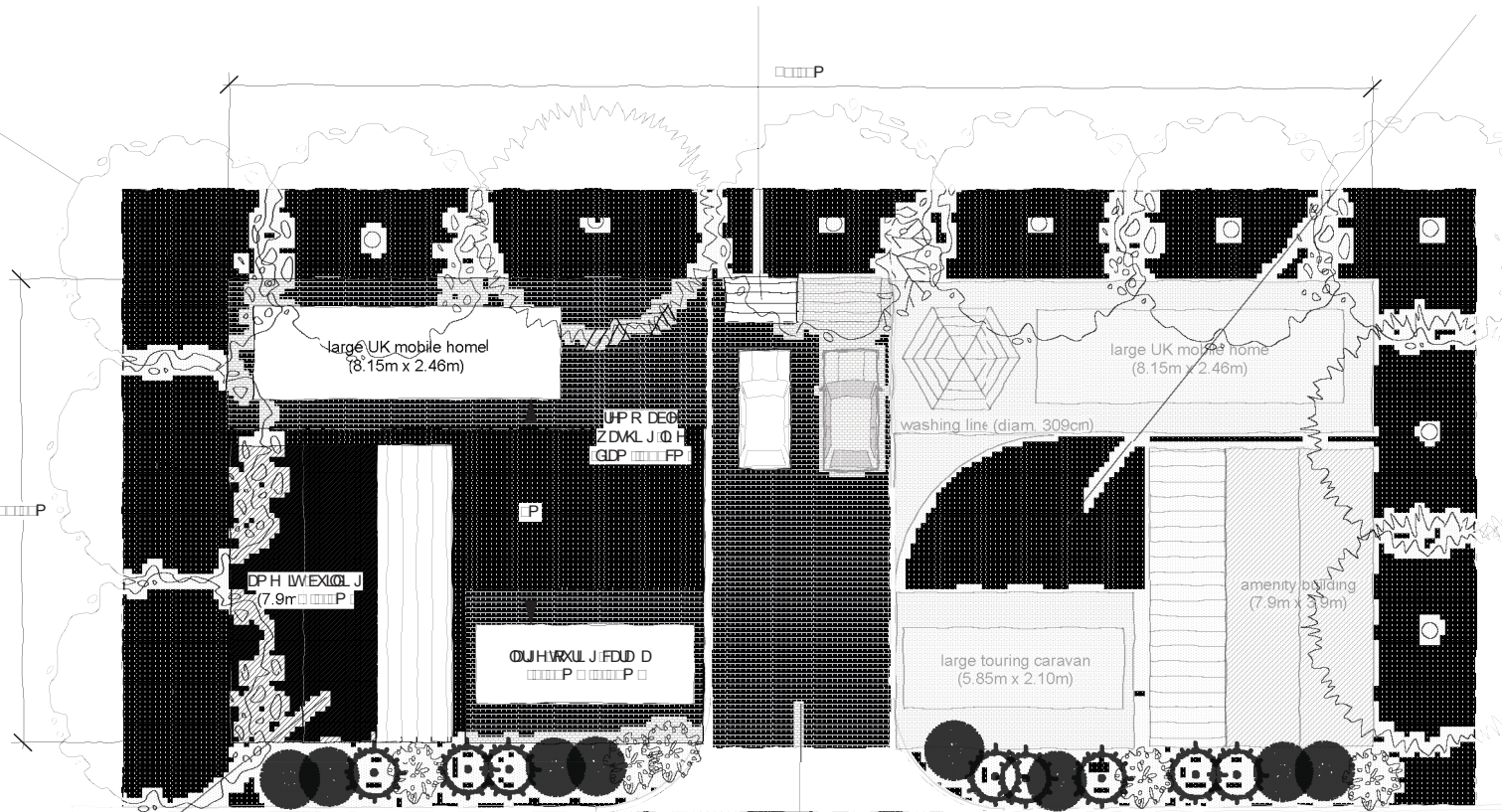
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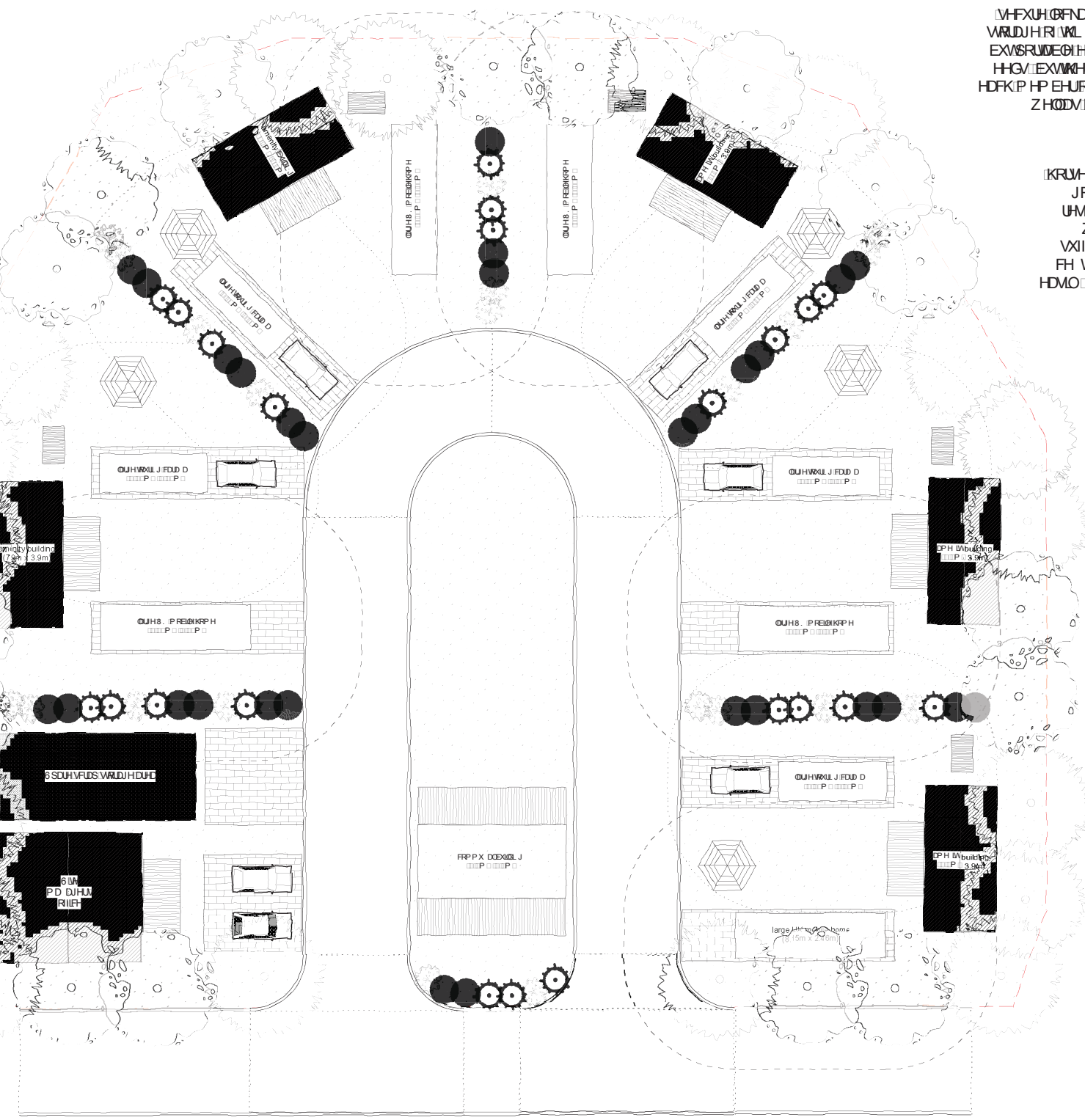
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Essential Reference Paper 'C'

Hertfordshire Neighbouring Local Authority Gypsies and Travellers and Travelling Showpeople Needs, at August 2014

Hertfordshire Neighbouring Local Authority Needs – Gypsies and Travellers

Neighbouring Local Authority/Time Period	2011/12-2015/16	2013-2018	2016/17-2025/26	2018-2023	2023-2028	Total
Broxbourne	Awaiting results of study					
North Herts	Awaiting results of study					
Stevenage		3		3-5	3-5	9-13
Welwyn Hatfield	25		29			54

Hertfordshire Neighbouring Local Authority Needs – Travelling Showpeople

Neighbouring Local Authority/Time Period	2023				Total
Broxbourne	Awaiting results of study				
North Herts	Awaiting results of study				
Stevenage	0				0
Welwyn Hatfield	1				1

Essex Neighbouring Local Authority Gypsies and Travellers and Travelling Showpeople Needs, at August 2014

Essex Neighbouring Local Authority Needs – Gypsies and Travellers

Neighbouring Local Authority/Time Period	2013 – 2018	2018 – 2023	2023 – 2028	2028 – 2033	Total
Epping Forest	54	18	19	21	112
Harlow	9	5	5	6	25
Uttlesford	9	5	6	6	26

Essex Neighbouring Local Authority Needs – Travelling Showpeople

Neighbouring Local Authority/Time Period	2013 – 2018	2018 – 2023	2023 – 2028	2028 – 2033	Total
Epping Forest	0	0	1	1	2
Harlow	0	0	0	0	0
Uttlesford	0	0	0	0	0

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 22 OCTOBER 2014
EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING
AND TRANSPORT

MEAD LANE URBAN DESIGN FRAMEWORK

WARD(S) AFFECTED: Hertford Bengoe, Hertford Castle, Hertford
 Kingsmead

Purpose/Summary of Report

- This report presents the main issues raised during the consultation on the draft Mead Lane Urban Design Framework (UDF) and seeks agreement that the proposed amendments be made, and that the UDF be adopted as a Supplementary Planning Document to the East Herts Local Plan, Second Review, April 2007 (Saved Policies).

RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE
PANEL AND EXECUTIVE: That:

(A)	the issues raised during the public consultation on the draft Mead Lane Urban Design Framework, together with the Officer responses, be noted;
(B)	in light of the responses received, the suggested amendments to the document be supported; and
(C)	the Mead Lane Urban Design Framework be supported for adoption as a Supplementary Planning Document to the East Herts Local Plan, Second Review, April 2007 (Saved Policies).

RECOMMENDATIONS FOR COUNCIL: That:

(A)	the issues raised during the public consultation on the draft Mead Lane Urban Design Framework, together with the Officer responses, be agreed;
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(B)	in light of the responses received, the suggested amendments to the document be agreed; and
(C)	the Mead Lane Urban Design Framework be adopted as a Supplementary Planning Document to the East Herts Local Plan, Second Review, April 2007 (Saved Policies).

1.0 Background

1.1 The Mead Lane area of Hertford has historically been one of the key employment generators in the town. It has long been designated as an Employment Area in the Local Plan and continues to fulfil its role in this respect. However, while the eastern part of the site has prospered and has benefited from areas of modern development, the western element has suffered in most locations from poor quality, older buildings and dereliction. In particular, the large area of land covering the former gas site has remained vacant for many years. Existing residential developments in Mead Lane, Marshgate Drive and Spencer Street also experience poor environmental quality and amenity.

1.2 In recent years, parts of the western section have seen some improvement and environmental uplift via a policy change introduced in the adopted East Herts Local Plan, Second Review, April 2007. This identified, via Policy HE5, that an area to the west of Marshgate Drive, north of Mead Lane and bounded by the Lee Navigation to the north had the potential for residential development.

1.3 The redevelopment of the former depot on Mill Road (The Waterfront), and The Meads development in Mead Lane, has resulted in a significant improvement to the character of the area. The redevelopment of the remainder of the former TXU site, which is currently ongoing, and the implementation of the recent planning permission for land immediately to the north of Hertford East station (subject to S106) will enhance this section of the Mead Lane area further. However, this still leaves other areas of land within the Employment Area located to the east of Marshgate Drive which are in desperate need of regeneration. The Mead Lane Urban Design Framework has been prepared in order to guide the regeneration of the Mead Lane area and to facilitate the reintegration of the area with the wider town.

2.0 Report

- 2.1 Members may recall that a draft version of the Mead Lane UDF was prepared and presented to the Council's Executive in 2011 where it was agreed that it should be subject to a six week period of public consultation. The consultation was undertaken between 16th June and 28th July 2011, during which time a total of 163 representations were received from 39 consultees.
- 2.2 Following the consultation, work on the UDF was not able to progress due to the need to focus all available resources on the preparation of the emerging District Plan. While in draft form the UDF has been afforded some weight as part of the consideration of planning applications, and as such, the content of the document has influenced development proposals that have come forward. However, the recent expansion of the Planning Policy Team has allowed work on the document to continue through to adoption.
- 2.3 A schedule of issues raised during the consultation is contained within **Essential Reference Paper 'B'** along with officer responses and, where considered appropriate, proposed amendments to the UDF. These are either described or shown as tracked changes. It should be noted that the Council is able to make non-material amendments (i.e. changes that are not significant) to the document without the need for a further period of public consultation. There are no material amendments proposed to the document.
- 2.4 Should Members agree to the proposed amendments, the final version of the UDF, which can be found **within Essential Reference Paper 'C'** (which is a final clean version without any tracked changes shown), may be formally adopted as a Supplementary Planning Document (SPD) in accordance with Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Once adopted, the UDF, which will supplement Policy HE5 of the adopted East Herts Local Plan Second Review 2007, will be afforded significant weight as part of the consideration of future development proposals in the Mead Lane area.

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

Non-Key Decision – 11/07: Mead Lane Urban Design Framework
(<http://www.eastherts.gov.uk/meadlaneudf>)

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

<p>Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):</p>	<p>People – Fair and accessible services for those that use them and opportunities for everyone to contribute</p> <p>This priority focuses on delivering strong services and seeking to enhance the quality of life, health and wellbeing, particularly for those who are vulnerable.</p> <p>Place – Safe and Clean</p> <p>This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p>Prosperity – Improving the economic and social opportunities available to our communities</p> <p>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>
<p>Consultation:</p>	<p>The consultation on the draft Mead Lane UDF took place from 16th June to 28th July 2011.</p>
<p>Legal:</p>	<p>The UDF will be adopted in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012</p>
<p>Financial:</p>	<p>None</p>
<p>Human Resource:</p>	<p>Officer time in undertaking the necessary tasks to formally adopt the document as an SPD.</p>
<p>Risk Management:</p>	<p>Failure to prepare an Urban Design Framework to be adopted as a Supplementary Planning Document could lead to piecemeal development in the Mead Lane area that fails to achieve the best outcomes in terms of the successful regeneration and enhancement of the area.</p>
<p>Health and wellbeing – issues and impacts:</p>	<p>The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing.</p>

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Consultation Statement

- 1.1 A public consultation was undertaken on the draft Mead Lane Urban Design Framework for a six week period from 16th June to 28th July 2011. A total of 163 representations were received from 39 consultees.
- 1.2 Representations were received from the following organisations and individuals:

Hertfordshire County Council Planning
Natural England
Hertfordshire County Council Historic Environment Unit
Greater Anglia
Hertford Town Council
Lambert Smith Hampton (on behalf of BRB Residuary Ltd)
Environment Agency
SUSTRANS
Thames Water
Ramblers' Association
Hertford Civic Society
Transition Hertford
Vincent and Gorbing (on behalf of National Grid Property Ltd)
1 st Hertford Scout Group
Hertfordshire Highways
Network Rail Property
Highways Agency
British Waterways (now known as the Canal & River Trust)
JB Planning (on behalf of Marchfield Properties Ltd)
Mr Roy Woodhall
Mr Tom Stuttard
Mr Alan Wilks
Mr Laurence Symonds
Dr and Ms Lewis
Mr Ray Bomber
Coral Haswell
Ms Jones
Mr Nigel Waller
Mrs Rachel Wilson
Dr Gary Manchee
Mr Robert Schofield
Mr Perry Wilebore

Mr David Stockman
Mr Ian Davis
Miss Nicolette Harley
Mr Welch
Miss Alexandra Panaretou
Mrs Carolin Drewitt
Mrs P.E Hills

1.3 The schedule below summarises the main issues raised through the consultation, along with officer responses and proposed amendments to the Mead Lane Urban Design Framework.

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
General – Employment	Retention of employment areas is considered to be of the greatest importance and the UDF should reflect this.	The focus of the UDF is to retain and expand employment uses in the Mead Lane area while regenerating underused employment land through mixed use development. Development of housing and other uses on underused parts of the site will allow for the provision of new infrastructure which will support new and existing employment space.	None
General – Community Facilities	The UDF makes no reference to the provision of community facilities	Chapter 10 of the document does identify the fact that the areas around Marshgate Drive and the River Lea Corridor could be suitable for the provision of spaces for community use. The nature and location of such uses will be determined through the planning application process. The site is in a highly sustainable location close to the town centre where such facilities are	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
General – Sustainable transport	The 'Lea Valley Walk' should be referred to in the same light as National Cycle Network Route 61.	already located. Agreed. The UDF should be amended to reflect the importance of the Lea Valley Walk	<p><u>Paragraph 2.2, bullet point 3:</u> New pedestrian/cycle friendly routes throughout the Mead Lane area and enhanced links to the surroundings, such as a link from Hertford East Station to Hartham Common and the National Cycle Network Route 61, and the existing crossing at Rowleys Road <u>and improved access to the route of the Lea Valley Walk.</u></p> <p><u>Paragraph 10.11, 3rd sentence:</u> The towpath corridor along the south side of the river, <u>which forms part of the Lea Valley Walk,</u> will be upgraded and widened and the attractiveness of its setting reinforced.</p>
General – Sustainable transport	The phrase 'pedestrian/cycle friendly routes' is an oxymoron as a cycle route is not friendly for pedestrians.	It is considered that pedestrian/cycle friendly routes are a highly effective option for delivering sustainable transport principles. Every effort will be made to reduce conflict	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		between different users although limitations of space may mean compromises have to be made.	
General – Sustainable transport	The bus route needs to be economically viable	The Council believes that it would be desirable for the development to benefit from a bus service in order to help promote the use of sustainable transport. Discussions have taken place with bus operators and the viability of extending a route to serve the development is being considered. Contributions from developers will ensure its viability in the initial years. Patronage would subsequently need to be of a sufficient level to ensure the service is retained.	None
General – community involvement	The local residents and communities have not been involved in this process	The UDF supplements the policies contained within the adopted East Herts Local Plan (2007). The Local Plan was subject to a number of stages of public consultation	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		during its preparation. A 6 week consultation was also undertaken on the draft UDF in 2011 which this schedule is in response to. There will be further opportunities to comment on planning applications as and when they are submitted.	
General – CIL	Development may come forward following the deadline for implementing CIL. If contributions will be S106 only then this should be stated in the document.	At present, the Council has not made a decision on whether to implement a CIL charging schedule or not. The UDF is flexibly worded so that it can fit either delivery mechanism. The type and level of developer contributions will be discussed at the planning application stage.	
General – Social Disorder	The area around Hertford East already suffers from anti-social behaviour. A hotel next to the station may lead to an increase in this problem. There are also sufficient hotels in Hertford already.	The draft UDF makes reference to the possible provision of a hotel on land north of Hertford East. An application on this site for 107 dwellings and a commercial unit was approved subject to S106 in	<u>Paragraph 2.2. bullet point 15:</u> Diversifying the uses within the area to limit peak hour traffic congestion including the potential provision of a hotel, retail <u>commercial space</u> and increased leisure space; and other measures to address local congestion and capacity issues.

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		<p>July 2014. Reference to the provision of a hotel can therefore be removed.</p> <p>The Council will work with developers through the planning application process to ensure that the design of new developments reduces the possibility of anti-social behaviour and crime in accordance with Para 58 of the NPPF and the principles of the 'Secured by Design' initiative as outlined in paragraph 8.6.2 of the adopted Local Plan.</p>	<p><u>Figure 9</u> Remove reference to 'New Station Hotel'.</p> <p><u>Paragraph 10.5, 1st sentence</u> This will be predominantly residential with potential opportunities for a range of other commercial uses such as retail and, restaurant uses, and a hotel opposite Hertford East Station.</p> <p><u>A Vision for the Mead Lane Area (Page 38)</u></p> <p>The site adjacent to Hertford East station is highlighted as being well suited for a hotel use, a new Station Hotel reinterpreting an historical pattern. This must be fully explored as a development option.</p> <p><u>Figure 14</u> Remove reference to 'Hotel'.</p>
General – Education	Hertford schools are already oversubscribed – what will be done to address this issue? There may be a need for the provision of a new	The Council is currently preparing a new District Plan which will allocate sites for	<p><u>Paragraph 11.8, 2nd sentence.</u></p> <p>S106 obligations will generally be</p>

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	primary school, either for this site individually or in conjunction with other developments.	<p>development for the period up to 2031. As part of the evidence base for this work, discussions are ongoing with Hertfordshire County Council in order to understand education requirements in Hertford and the rest of the District. This critical issue will therefore be addressed through the preparation of the District Plan rather than the UDF in isolation.</p> <p>The proposals for the expansion of Simon Balle School to become an All Through facility are expected to form a planning application in autumn 2014. This will meet the primary education needs of development in the Mead Lane area.</p>	calculated on the basis of the adopted Planning Obligations SPD, <u>taking into account the content of the HCC Toolkit in order to ensure that the full range of requirements are met.</u> However, it should be recognised that the scope for payments will be increased in the Mead Lane area to ensure that the objectives of the UDF are fully met.
General - Housing Provision for the Elderly	It is considered that this is an appropriate site for residential homes for the elderly. Will there be a provision for this on the proposed development site?	The UDF does not seek to prescribe types of residential accommodation and allows for a flexible approach.	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
General - Support	There is general and specific support for the regeneration and development of the Mead Lane Area including the provision of new pedestrian and cycle routes and a new step free river crossing.	Support is noted and welcomed.	None
General – Climate change	The key issue to address is climate change – the UDF should recognise this to a greater extent. There needs to be a move away from oil dependency to more local solutions.	The UDF supplements saved policies contained within the adopted Local Plan which includes policies which seek to mitigate climate change. Chapter 2 of the Local Plan seeks to address issues impacting on sustainable development at the local level. Chapter 11 of the draft UDF also identifies the importance of implementing a high standard of sustainability within new development. However, the UDF cannot require sustainability standards that go beyond those contained within the adopted Local Plan.	None
General – historic	Reference to the historic environment and archaeological heritage should be made and	The draft UDF does reference the need to	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
environment	the need to conserve them. A requirement should be included for developers to consider at an early stage the potential for the presence of currently unknown heritage assets. An assessment of this issue should be included in the validation process for any planning applications.	maintain identified heritage assets in the area in paragraphs 7.5 to 7.7. The Council's validation checklist requires a heritage statement to be submitted in support of planning applications. Any currently unknown issues of this nature would therefore be identified through that process.	
General - biodiversity	Need to ensure that development proposals take into account the possible presence of protected species as water vole and otter have been recorded in the vicinity and it is known that important bat roost sites are within 1km of the Mead Lane Site. The UDF should also consider lighting arrangements along the Lea corridor so as to minimise glare and avoid any light falling onto the watercourse and its banks.	The Council's validation checklist requires a biodiversity statement to be submitted in support of planning applications. Any issues regarding the presence of protected species would be identified through this process. Paragraph 11.5 to be amended to reference issue of lighting	<u>New sentence at the end of Paragraph 11.5</u> <u>Particular consideration should be given to lighting arrangements within new developments to ensure that the natural environment of the River Lea and its banks are not negatively affected.</u>
General - Sewage	Thames Water, the statutory sewerage undertaker for the Mead Lane area, are	Since the close of the consultation on the UDF,	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	<p>concerned that the network in this area may be unable to support the demand anticipated from the proposed development. Thames Water recommend that additional supporting text should be included in the UDF requiring developers to demonstrate that adequate capacity exists or that additional capacity can be provided.</p>	<p>Thames Water has indicated that there is likely to be sufficient capacity to meet the requirements of new development in this area due to recent upgrades to Rye Meads STW.</p>	
<p>General - Town Centre</p>	<p>The UDF makes no connection with the problems facing the historic town centre and what pressures development in the Mead Lane area might put on the town centre.</p>	<p>It is not considered that development proposed in this area would impact negatively on the town centre. The UDF seeks to maintain existing employment uses in the area while providing new residential dwellings on vacant or underused parts of the site. The Mead Lane area is in an edge of town centre location and therefore within easy walking distance of the services and facilities located there. Development in the Mead Lane area is therefore likely to support</p>	<p>None</p>

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		the social and economic function of the town centre rather than be detrimental to it. Any commercial space provided in this location would be of a small scale and would not impact upon the vitality of the town centre	
General – Funding	Some contribution to the proposed new road link needs to be provided by grant or from the s106 pot. Without this there is a risk of having an adopted SPD that limits future development as landowners will not have enough of an incentive to take their sites through the planning process.	An application for 107 dwellings and provision of a link road on the site to the immediate north of Hertford East station was approved subject to S106 by the Council in July 2014. A link between Marshgate Drive and the existing access road off Mead Lane will be required as part of any proposals to bring that part of the site forward.	None
General - Litter	Until such a time as any regeneration actually begins, the Council should make an effort to resolve important but basic matters such as the provision of adequate litter bin facilities and ensure they are emptied at regular intervals.	Noted. In terms of making provision for litter bins as part of new development, the UDF is a broad framework and does	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		not include this level of detail. Such issues will be addressed at a later stage.	
General – Amenity	The amenity of existing residents in the area needs to be considered, particularly the setting of existing houses.	The amenity of existing residents is an important consideration. The UDF is a broad framework which identifies uses and is not a detailed masterplan although it does identify the enhancement of Marshgate Drive as a strategic objective to the benefit of residential amenity. The design of new development will be addressed during the planning application process. A key consideration will be reducing potential conflict between employment and residential uses. A B1 (office) buffer will separate residential and other potentially non neighbourly uses	None
General – Flooding	The use of SUD's must be considered. An objective of the UDF should be to address flooding issues.	Paragraph 11.1 of the draft UDF indicates that the use of SUD's is expected. The	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		final objective in Paragraph 2.2 relates to the need to reduce flood risk.	
General - Transport	The junction of Mill Road and Ware Road already suffers from congestion and traffic on Mead Lane is already excessive. Development may make this worse.	Reducing congestion is a key consideration for the UDF and is linked to the outcomes of the Mead Lane section of the Hertford and Ware Urban Transport Plan (UTP). Chapter 8 of the UDF, 'Movement Strategy', identifies the need to incorporate sustainable travel principles and careful street design in order to encourage walking, cycling and use of passenger transport. New walking and cycling routes will therefore be provided. A bus interchange and extended routes will also support the development and offer modal choice. The location of the site close to the town centre and to Hertford East railway station should reduce car usage. In	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		<p>addition, the UDF identifies that a car club could be provided on site. The link road will improve traffic flow on site while the configuration of existing junctions such as Mill Road and Ware Road will be considered through the planning application process</p>	
General – Transport	<p>A link road is not the most appropriate approach for dealing with transport issues in the Mead Lane area. Instead, Mead Lane and Mill Road should be widened and the bend between the two roads be made safer. This option is more deliverable than the link road contained in the draft UDF. The bus interchange proposed as part of the link road development would reduce the developable area of the site.</p>	<p>The link road is considered to be the best option for improving traffic flows on site. It will be delivered through a planning permission recently approved subject to S106 for 107 dwellings and a commercial unit. The bus interchange will also be delivered as part of this development.</p>	None
General – Transport	<p>The use of 20mph zones is supported. It would be a shame if the one way system on site causes speeding to occur</p>	<p>Support noted and welcomed. The UDF does not propose a one way system on site.</p>	None
General - Transport	<p>Close co-operation needs to take place between the Council and the future franchise</p>	<p>Ongoing discussions between East Herts, HCC</p>	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	holder operating services from Hertford East.	and the Train Operating Company 'Abellio' will continue	
1.2	Steps could have been taken a long time ago to develop a strategy for development to support activities that are far less reliant on vehicle use.	<p>The UDF identifies a number of principles which should encourage sustainable travel.</p> <p>Chapter 8 of the UDF, 'Movement Strategy', identifies the need to incorporate sustainable travel principles and careful street design in order to encourage walking, cycling and use of passenger transport. New walking and cycling routes will therefore be provided. A bus interchange and extended routes will also support the development and offer modal choice. The location of the site close to the town centre and to Hertford East railway station should reduce car usage. In addition, the UDF identifies</p>	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		that a car club could be provided on site. The link road will improve traffic flow on site while the configuration of existing junctions such as Mill Road and Ware Road will be considered through the planning application process	
1.3	It is considered that recent development acts as a barrier to the riverside and is too large in scale.	The UDF is concerned with future development. However, it is considered that both of these developments have significantly enhanced the built environment in that area. Nevertheless, experience of past developments will inform the process going forward. The UDF states that new development in the Mill Road character area should not exceed three and a half storeys in height. Provision of new pedestrian and cycle routes and a new crossing of the River Lea will increase	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
2	The impact on the town centre needs to be assessed.	<p>access to the riverside.</p> <p>It is not considered that development proposed in this area would impact negatively on the town centre. The UDF seeks to maintain existing employment uses in the area while providing new residential dwellings on vacant or underused parts of the site. The Mead Lane area is in an edge of town centre location and therefore within easy walking distance of the services and facilities located there. Development in the Mead Lane area is therefore likely to support the social and economic function of the town centre rather than be detrimental to it. Any commercial space provided in this location would be of a small scale and would not impact upon the vitality of the town centre</p>	None
2.2	There is no mention in the SPD of the	Chapter 10 of the document	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	provision of community buildings as often used by youth groups. Part of the Framework's mix should give more consideration to leisure use.	does identify the fact that the areas around Marshgate Drive and the River Lea Corridor could be suitable for the provision of spaces for community use. The planning application process will determine the nature and location of such uses. The site is also in a highly sustainable location close to the town centre where such facilities are already located	
2.2	The new bridge over the Lea is not required. The existing bridges should be widened to allow pedestrians and cyclists to cross.	Technical difficulties identified with the bridge suggested in the draft document at the end of the Waterfront development are currently unable to be resolved so will be unable to be progressed at this stage. However, Herts County Council is currently developing proposals to replace the existing bridges at the end of Mill Road with structures suited to all user groups.	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
2.2	Car club parking would lead to increased congestion at peak times in the Mead Lane area. Would such a club not be better positioned within the Gascoyne Way Car Park?	Car clubs are designed to help facilitate a step change away from car ownership thereby helping to reduce congestion. Residents in the Mead Lane area would be less likely to use the car club if it was located away from the immediate area. Should the provision of a car club to support the development prove successful it could be expanded to accommodate residents from a wider area.	None
2.2	Has any thought been given to providing car parking solutions for residents in the Mead Lane area?	It is considered that the Mead Lane area is in a highly sustainable location close to the town centre and Hertford East station. While it is important that new residential development provides an appropriate level of parking for residents, the focus of the UDF is to encourage more sustainable forms of transport. Controlled Parking Zones (CPZ's) could be considered	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		to address any issues arising in due course.	
2.2	How does the provision of additional retail space and a hotel compliment the aim of addressing local congestion issues? Problems with congestion caused by the traffic light junction with Ware Road.	<p>Reference to a hotel can be removed from the UDF following approval of a planning application for 107 dwellings and a commercial unit on the site. Any commercial units will be small scale in nature and should only support nearby development. It is not considered that provision of such facilities would increase congestion and, as a walkable local service, could reduce car borne traffic depending on the nature of occupancy.</p> <p>Chapter 8 'Movement Strategy' identifies the need to incorporate sustainable travel principles and careful street design in order to encourage walking, cycling and use of passenger transport. New walking and</p>	See changes proposed on Page 3 of this schedule in relation to removing reference to a hotel.

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		<p>cycling routes will therefore be provided. A bus interchange and extended routes will also support the development and offer modal choice. The location of the site close to the town centre and to Hertford East railway station should reduce car usage. In addition, the UDF identifies that a car club could be provided on site. The link road will improve traffic flow on site while the configuration of existing junctions such as Mill Road and Ware Road will be considered through the planning application process.</p>	
2.2	<p>Possibility of moving Hertford East station 200 yards eastwards to allow space for a road from Mead Lane to the A119</p>	<p>This is not considered to be a realistic option in the context of this document.</p>	None
2.2	<p>There is a lack of education capacity in the local area</p>	<p>The Council is currently preparing a new District Plan which will allocate sites for development for the period</p>	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		<p>up to 2031. As part of the evidence base for this work, discussions are ongoing with Hertfordshire County Council in order to understand education requirements in Hertford and the rest of the District. This critical issue will therefore be addressed through the preparation of the District Plan rather than the UDF in isolation. The proposals for the expansion of Simon Balle School to become an All Through facility are expected to form a planning application in autumn 2014. This will meet the primary education needs of development in the Mead Lane area.</p>	
2.2	<p>It is not considered necessary to retain as much existing employment as possible. A mix of uses is more suitable</p>	<p>The Council considers that it is vital to maintain existing employment on this site in order to support the vibrancy of the local economy. The UDF acknowledges that a mix of uses may be required</p>	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		to allow the re-development of key sites. The area to be re-developed has been vacant for a number of years and development will provide additional employment above the existing level.	
2.2	Objection to the provision of new link road on the former Gas Storage site as it would have a detrimental impact on overall site layout and is also not necessary given the proximity to the proposed interchange by Hertford East station. It is unlikely that a bus operator would agree to run services through the site given proximity to existing services.	<p>A link road on the site would improve traffic flow and also help to facilitate the provision of a bus service. Access will be required into the site in any event. A link road can be used to separate residential and employment uses. Provision of a bus service is a key element of the UDF in order to support sustainable travel patterns and reduce car borne traffic.</p> <p>Discussions have taken place with bus operators and the viability of extending a route to serve the development is being</p>	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		considered. Contributions from developers will ensure its viability in the initial years. Patronage would subsequently need to be of a sufficient level to ensure the service is retained.	
2.2	The height of new development should be restricted to 3 storeys or less as taller buildings will cause disturbance to television reception.	The UDF indicates that new development in the Mill Road area should be restricted to a maximum of three and a half storeys in height. However the height of buildings needs to be considered on a site specific basis depending on individual circumstances.	None
2.2	The creation of new cycle routes does not make sense and will lead to more anti-social behaviour.	The Council will work with developers through the planning application process to ensure that the design of new developments reduces the possibility of anti-social behaviour and crime in accordance with Para 58 of the NPPF and the principles of the 'Secured by Design' initiative as outlined in	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		<p>paragraph 8.6.2 of the adopted Local Plan.</p> <p>Cycle routes are a key aspect of the sustainable transport principles for the site which should help to reduce car borne travel and in turn help ameliorate congestion issues.</p>	
2.2	There is already a lack of parking at Hertford East station which would be exacerbated if a hotel was built.	Reference to the construction of a hotel can be removed following granting of permission for 107 dwellings and a commercial unit on the site.	See changes proposed on Page 3 of this schedule in relation to removing reference to a hotel.
2.3	There is no delivery strategy within the UDF.	The UDF provides a Design Framework against which any future planning applications will assessed. Applications will therefore need to reflect the objectives of the UDF.	None
2.3	Could a cinema be included within the proposed leisure space?	Since the consultation on the UDF, Hertford Theatre now offers regular film showings. A large standalone facility of this	None

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		nature would be unsuitable in the Mead Lane area.	
2.3	The roads are not suitable for large vehicles	The UDF includes provision of two new link roads to improve traffic flows on the site and also the widening of Marshgate Drive which should help to reduce the conflict between the street scape and the movements of large vehicles. HCC as Highways Authority is satisfied with the proposals subject to meeting the proposals of the Hertford and Ware Urban Transport Plan.	None
2.3	There should be a statement within the UDF to say that extant Community and Leisure facilities that serve the town should be preserved.	Noted. Chapter 10 can refer specifically to the preservation or possible enhancement of the Hertford Scout Group facility and the Canoe Club.	New sentence after 9 th sentence of Para 10.11: There may be some scope to improve the river setting through selective redevelopment. <u>Existing community facilities such as the Hertford Scout Group and the Canoe Club should be retained and, where possible, enhanced.</u>
2.3	Remove the pavement on the South Side of	The UDF suggests the	None

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	Mead Lane and allow parking on the North Side. This would avoid the 'Slalom-effect' when driving down the road.	provision of a 3 metre wide pedestrian/cycleway on the south side of Mead Lane. This forms an integral part of making the overall site more pedestrian and cyclist friendly. Parking arrangements will be agreed separately although it is considered that the current arrangements reduce potential speeds of vehicles and allow for pedestrian choice.	
3	Development in this area would lead to increased traffic which is not consistent with sustainable development principles.	The regeneration of this vacant area will inevitably lead to some additional traffic movements. However, Chapter 8 'Movement Strategy' identifies the need to incorporate sustainable travel principles and careful street design in order to encourage walking, cycling and use of passenger transport. New walking and cycling routes will be provided. A bus interchange	None

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		<p>and extended routes will also support the development and offer modal choice. The location of the site close to the town centre and to Hertford East railway station should reduce car usage. In addition, the UDF identifies that a car club could be provided on site. The link road will improve traffic flow on site while the configuration of existing junctions such as Mill Road and Ware Road will be considered through the planning application process.</p>	
5	<p>The issues of climate change and peak oil need to be addressed through an integrated approach.</p>	<p>The UDF supplements saved policies contained within the adopted Local Plan which includes policies which seek to mitigate climate change. Chapter 2 of the Local Plan seeks to address issues impacting on sustainable development at</p>	None

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		<p>the local level. Chapter 11 of the draft UDF also identifies the importance of implementing a high standard of sustainability within new development. However, the UDF cannot require sustainability standards that go beyond those contained within the adopted Local Plan.</p>	
5	<p>A paragraph should be included under the policy context section about East Herts Council's SFRA as this document can act to guide where development should be placed given this is an area at risk to flooding. The aims and principles of the River Basement Management Plan should also be followed.</p>	<p>Agreed. The Planning Policy Context in section 5 needs to be updated to reflect recent changes.</p>	<p><u>5 Planning Policy Context</u></p> <p><u>5.1 National planning guidance is contained within the National Planning Policy Framework and the associated Planning Practice Guidance. A number of national policies are of relevance to any development proposals in the Mead Lane area.</u></p> <p><u>5.2 (deleted)</u></p> <p>Add new Paragraph 5.7:</p> <p><u>The Strategic Flood Risk Assessment, which was completed</u></p>

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			<u>in November 2008, is also relevant to the Mead Lane area in that part of the site is within designated Flood Zones 2 and 3. This will need to be considered as part of any development proposals with the sequential test applied as appropriate.</u>
5.1	PPS9 is also of particular relevance to any development proposals as its aim is to prevent harm and restore value to nature conservation interests. This is particularly relevant given the River Lea runs through this area.	Noted. However PPS9 has been superseded by the NPPF. The amendment shown above under Chapter 5 reflects this.	As above under Chapter 5.
5.4	The land that is currently occupied by the Scouts should not be subject to further development other than enhancing its existing use.	It is agreed that this facility should be maintained and redevelopment does not form part of the proposals in this UDF.	New sentence after 9 th sentence of Para 10.11: There may be some scope to improve the river setting through selective redevelopment. <u>Existing community facilities such as the Hertford Scout Group and the Canoe Club should be retained and, where possible, enhanced.</u>
5.7	The UDF does not follow the principles of localisation which involves meeting the needs of a community in the local area. It perpetuates the strategies which have led to global	The Mead Lane area is in a highly sustainable location within walking distance of the town centre, a large	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	warming.	supermarket and a railway station and a bus station. It is considered that development in this area would represent sustainable development.	
5.7	The retention of employment areas is vitally important and the Framework must recognise the value of the location for this purpose.	It is vital to maintain existing employment on this site in order to support the vibrancy of the local economy. The content of the UDF reflects this and seeks to provide additional employment space.	None
6.1	Highway capacity is key in this area	Given that the site is in a highly sustainable location, the UDF seeks to encourage walking and cycling and the use of public transport as much as possible. However, capacity of local roads is also a key issue and the new link roads will improve traffic flow on site while the re-configuration of existing junctions to increase capacity will be considered at the planning application	None

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		stage	
6.2	The draft UDF raises the single point of access as an issue. This assumes road based access is a priority when other forms of access are possible.	Mitigation is key to bringing forward development in the area. However, the single point of road access is a recognised constraint and the UDF proposes a range of sustainable transport principles to encourage alternatives to car use and engender a modal shift.	None
6.2	Proposals to widen Marshgate Drive would be supported if they were sponsored or delivered by the Council as this may eliminate any potential for ransom or land assembly issues. However, if the onus is on National Grid Property Ltd to deliver without assistance to assemble the land this may present a risk.	Responsibility for delivery is a matter to be determined at the planning application stage. The UDF sets the context for what should be delivered in the area.	None
6.3	It would be simple and cost effective for the steps that provide access to the recreational area of Hartham Common be replaced by ramps as they are not steep and are of a low gradient.	The steps and width of the bridge together makes the crossing difficult for cyclists. Herts County Council is currently developing proposals to replace the existing bridges at the end of Mill Road with structures suited to all user groups.	None
6.4	The real blight is over development with the	The UDF is concerned with	None

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	recent developments at The Meads and The Waterfront.	future development. However, it is considered that both of these developments have significantly enhanced the built environment in that area. Nevertheless, experience of past developments will inform the process going forward.	
6.4	Undeveloped land on site does blight the area and appropriate development will improve the street scene.	Agreed.	None
6.5	The abnormally expensive costs of developing the sites due to required remediation work cannot be ignored as this may lead to no development taking place.	It is acknowledged that remediation work will be required on certain parts of the site. The costs of any such work be a consideration when looking at the viability of any schemes as a whole as part of the planning application process	None
6.5	The proximity to watercourses and water abstraction points means that mobilisation of contamination must be avoided during remediation and construction works	Noted. The Council will consult with Thames Water, The Canal and River Trust and the Environment Agency as part of any application	None

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		received. Conditions can be applied to any granted planning permissions.	
6.6	There is concern that if businesses start to operate on a 24/7 basis this would adversely effect the harmonious balance which currently exists between local residences and small businesses.	It is important that potential conflict between residential and employment uses is managed appropriately. A B1 (office) buffer will separate residential and other potentially non neighbourly uses	None
6.7	Development within Flood Zone 2 should be resisted.	The Technical Guidance to the National Planning Policy Framework document indicates that residential and employment uses maybe appropriate within Flood Zone 2 following the application of the sequential test.	None
6.7	Residential development can be provided in Flood Zone 3 providing the sequential and exception tests are met. While it is accepted that residential development in Flood Zone 3b would draw objections from the Environment Agency it should be noted that there is potential for increased storage capacity in the flood plain, improving the overall flood risk in	Noted.	None

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	the area.		
6.7	Sustainable Drainage Systems (SuDS) should be incorporated around the site to address flood risk. Also, a flood risk sequential test should be addressed and applied at the earliest stage.	Paragraph 11.1 indicates that the use of SuDS is expected. The sequential test will need to be applied and demonstrated at the planning application stage in line with the NPPF.	Add new Paragraph 5.8: <u>The Strategic Flood Risk Assessment, which was completed in November 2008, is also relevant to the Mead Lane area in that part of the site is within designated Flood Zones 2 and 3. This will need to be considered as part of any development proposals with the sequential test applied as appropriate.</u>
6.7	The first sentence in this paragraph should be changed to reflect that development is not appropriate in flood zone 3b as defined by EHC's SFRA and PPS25. Flood Zone 3b comprises land where water has to flow or be stored in times of flood.	Agreed	6.7 The Environment Agency would object to any residential development in Flood Zone 3b as contrary to PPS25. <u>The location of residential dwellings within Flood Zone 3b would be contrary to the policies contained within the NPPF.</u>
7.1	When considering opportunities along the river and potential river improvements, consideration needs to be given to the long established Canoe Club which makes extensive use of the area.	Noted although it is considered that it would be more appropriate to refer to this issue in Chapter 10.	New sentence after 9 th sentence of Para 10.11: There may be some scope to improve the river setting through selective redevelopment. <u>Existing community facilities such as the Hertford Scout Group and the</u>

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			<u>Canoe Club should be retained and, where possible, enhanced.</u>
7.1	New developments have been too high.	The UDF is concerned with future development. However, it is considered that both of these developments have significantly enhanced the built environment in that area. Nevertheless, experience of past developments will inform the process going forward. The UDF states that new development in the Mill Road character area should not exceed three and a half storeys in height.	None
7.1	A bus interchange would increase traffic congestion in the area	The Council considers that good access to a bus service will encourage use of sustainable transport and reduce car usage and congestion in the local area. The scale of the interchange will not result in undue increases in traffic.	None
7.3	Improvements to the bridge crossing the Lea	Noted. Technical difficulties	None

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	near the swimming pool would be welcomed.	identified with the bridge suggested in the draft document at the end of the Waterfront development are currently unable to be resolved so will be able to be progressed at this stage. However, Herts County Council is currently developing proposals to replace the existing bridges at the end of Mill Road with structures suited to all user groups.	
7.4	Given that the Mead Lane area lies adjacent to one of Hertford's 'Green Fingers' it is vital that the natural landscape is retained and not over urbanised. Blocks of flats do not enhance the landscape.	The UDF is concerned with future development. However, it is considered that both of these developments have significantly enhanced the built environment in that area. Nevertheless, experience of past developments will inform the process going forward. The UDF states that new development in the Mill Road character area should	None

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		not exceed three and a half storeys in height. Sensitive design can enhance the river frontage and improve the overall setting.	
7.4	There is scope for designing in features of benefit to the wildlife which would greatly enhance the biodiversity of the River Lea area. Urban trees and planted areas would be attractive and consideration should be given to provide community gardens or allotment space. Finally, green roofs and living walls would also be of benefit.	<p>Both Paragraph 7.4 and the opportunities identified for the River Lea Corridor in Chapter 10 acknowledge the importance of ecological quality and of maximising opportunities to enhance the natural environment. In addition, Chapter 11 refers to the design principles of Manual for Streets which promotes the use of planting etc to enhance street scapes.</p> <p>Living walls should be referred to alongside green roofs in paragraph 11.1</p>	<p>4th sentence of Para 11.1:</p> <p>Subject to the overall coherence of design, the incorporation of green roofs <u>and living walls</u> will be promoted to foster sustainable drainage, heating and cooling benefits and biodiversity.</p>
7.4	There should be no residential development on the south side of the River between Marshgate Drive and Hertford Lock. Development of the scale to the west of Marshgate Drive overpowers the scene. The openness of that	The majority of the land by the river between Marshgate Drive and Hertford Lock is currently vacant or underutilised. It is	None

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	part of the river is important.	considered that providing some residential use in this area would enhance the river frontage through sensitive landscaping and design. A mix of uses is required to bring forward the redevelopment of key sites.	
7.4	Reference to the Green Fingers is welcomed	Support noted and welcomed.	None
7.6	The principle of supporting more sustainable modes of transport to the station is supported. A hierarchy of modes may be helpful i.e. walk, cycle, bus, taxi, car.	Support noted and welcomed. It is not considered that a hierarchy of modes would be helpful in this instance as the UDF seeks to promote the use of all forms of sustainable transport as a way of reducing car usage and therefore congestion.	None
7.7	The importance of the historic environment and archaeological heritage should be acknowledged within the SPD. This should include an assessment of proposed areas of development to identify areas with the potential to contain currently unknown heritage assets.	The draft UDF does reference the need to maintain identified heritage assets in the area in paragraphs 7.5 to 7.7. The Council's validation checklist requires a heritage	<u>New sentence at end of Paragraph 7.7</u> <u>The potential for archaeological finds should be considered as part of development proposals in consultation with Hertfordshire County Council's Archaeology</u>

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		statement to be submitted in support of planning applications. Any currently unknown issues of this nature would therefore be identified through that process. However, the paragraph should be amended to refer to archaeological heritage.	<u>section.</u>
7.7	None of the rail artefacts mentioned are of any real significance given that they are not listed and are not located in a conservation area. Maintaining them may constrain the developable area.	A number of the assets listed in Paragraph 7.7 are no longer present and so the text needs to be updated. It is considered that the features that remain, such as the embedded rails, should be retained where possible in order to help create a unique sense of place.	There are various other historical references to past railway use in the area which are also worthy of retention, including the wooden gates to the former goods yard and the crossing gate which formed part of the old level crossing on Mill Road. While not currently listed, these sets of gates are of local interest and should be maintained in a fixed open position. Other historical rail related features of interest, including that should also be retained are the the rails which are embedded into the road surface on the bridge to Dicker Mill and at Mead Lane, should be retained wherever possible in order to. Also,

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			redundant sets of buffers are currently located in the formerly used sidings and at least one set of these should be retained, either in situ or relocated as part of development proposals. These irreplaceable features provide an excellent opportunity to contribute towards the creation of a unique sense of place in this area via new development proposals.
7.7	The provision of a good quality, attractive information point outlining the historical and industrial heritage of the Dicker Mill area should be considered.	Noted. This very detailed design issue can be considered outside of the UDF process but would be a welcome feature.	None
7.10	The widening of Marshgate Drive should not lead to increased traffic speeds	The objectives of the UDF listed in Para 2.2 indicates that residential roads will be designed to achieve a 20mph standard.	None
8	The UDF refers to sustainable travel but there are no specific priorities or actions. There has been general and specific concern that there is no recognition of the inadequate state of the provision for walking and cycling at present. Many current journeys are unsafe and involve crossing busy roads. This is particularly the	Chapter 8 'Movement Strategy' identifies the need to incorporate sustainable travel principles and careful street design in order to encourage walking, cycling and use of passenger	<u>A Vision for the Mead Lane Area, Overview</u> The Mead Lane are will be enlivened by a healthy mix of uses and a network of streets and paths that provide good internal

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	<p>case for crossing the road around the Mill Road – Railway Street Crossing.</p>	<p>transport. New walking and cycling routes will therefore be provided. A bus interchange and extended routes will also support the development. The location of the site close to the town centre and to Hertford East railway station should reduce car usage. In addition, the UDF identifies that a car club could be provided on site. The link road will improve traffic flow on site while the configuration of existing junctions such as Mill Road and Ware Road will be considered through the planning application process</p> <p>Chapter 10 and in particular the Mill Road Opportunities acknowledges that improved pedestrian access from the station to the town centre is required. This includes seeking to enhance the crossing of Mill Road.</p>	<p>connections, promote walking <u>and cycling</u> and exploit the locational advantages of the area (see Figure 14).</p>

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		The Vision on page 38 should be amended to refer to both walking and cycling.	
8	Cycling is currently difficult due to high levels of traffic. Walking and cycling routes need to be kept separate.	It is considered that pedestrian/cycle friendly routes are a highly effective option for delivering sustainable transport principles. Every effort will be made to reduce conflict between different users although limitations of space may mean compromises have to be made.	None
8	Bus routes already get delayed on Ware Road. Providing a service in the Mead Lane area may make this worse.	Providing a bus service within the site may reduce some existing car usage and therefore ease congestion problems. The Hertford and Ware UTP requires development to ameliorate conditions at the junction of Mill Road and Ware Road.	None
8	HCC development control policies have previously not allowed any further development of the Mead Lane site without a second point of access. Work on the UTP	Noted. Paragraph 8.1 acknowledges the principles contained within the Hertford and Ware UTP. Any	<u>New sentence at the end of Paragraph 8.6</u> <u>Development of the Mead Lane</u>

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	<p>identified that providing segregated emergency access in front of Hertford East together with a new link road between Mill Rd and Mead Lane would enable the second point of access to be discounted.</p> <p>The Hertford and Ware UTP contains a number of schemes that would help to encourage sustainable travel to and from the area. Schemes to be considered include enhanced cycle storage provision in Hertford East Station, improvements to local cycle and pedestrian routes</p>	<p>planning application would need to submit a Transport Assessment and a Travel Plan where issues such as this should be explored with HCC as Highway Authority.</p> <p>Paragraph 8.6 should be amended to reflect links to the wider area.</p>	<p><u>area would offer opportunities for improvement to walking and cycling links between the destinations and wider environs, such as Ware.</u></p>
8	<p>The Highways Agency support the development of a sustainable travel strategy and are content to work with interested parties to ensure long distance journeys are kept to a minimum and thus minimising any additional burden on the strategic road network.</p>	<p>Support noted and welcomed.</p>	<p>None</p>
8.2	<p>It is important that high quality secure cycle parking is integrated into the development to promote sustainable travel.</p>	<p>An element of cycle parking is required for all new developments as part of parking standards within the adopted Local Plan and advice on provision is provided in the Vehicle Parking at New Development SPD. This</p>	<p>None.</p>

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		issue will be agreed through the planning application process.	
8.4	<p>Can EHC clarify what is understood by the term 'low car parking' in this instance?</p> <p>As a guide East Herts normal parking standards vary from 0.75 for 1-bed, 1 space for 2-bed, and 1.5 for a 3 bed therefore any significant reduction from East Herts normal parking standards may be restrictive to National Grid Properties development options for the site.</p>	<p>Details of parking space numbers can be determined at the planning application stage. The UDF sets out the principle of encouraging sustainable forms of transport and so acknowledges that, due to the sites sustainable location and single point of access, low car parking regimes may be implemented.</p> <p>A low car parking regime would provide a lower number of spaces than the maximum standards for residential development contained within the Vehicle Parking at New Development SPD.</p>	None
8.5	The bus interchange should be in a lay-by form able to accommodate three vehicles with two bays being classed as buses on stand with one operational stop.	The interchange will be delivered as part of the development approved subject to S106 in July 2014	None

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		including 107 dwellings, a commercial unit and a link road. The scheme also includes provision of the bus interchange sought by this representation.	
8.5	The provision of the segregated emergency access together with the new link road would be essential to mitigate the effects of any increase in traffic associated with potential future development.	Noted. However, technological advances that may have been developed since the consultation maybe investigated as providing an alternative solution to the layout included in the Hertford and Ware UTP. Encouraging the use of sustainable modes of transport will also reduce congestion issues.	None
8.7	The local authorities and any prospective developers should join the train operator in a station travel plan exercise for Hertford East Station. This will help determine the measures required to improve access to the station and prioritise needed investment.	Agreed. The potential for undertaking a station travel plan for Hertford East is acknowledged in paragraph 8.7 and this can be developed in due course.	None
8.8	Requirements for vehicular access to the station for deliveries and cash collection must be considered in any potential redevelopment of the East Herts Station site.	Noted. This issue can be considered at the planning application stage should any alterations to the station	None

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		frontage become part of final designs.	
8.8	A more frequent train service to London should operate from Hertford East using more modern trains.	The frequency of trains from Hertford East falls outside of the remit of this UDF.	None
8.8	An alternative entrance to Hertford East could undermine the commercial viability of the tenant businesses at the station.	The development is likely to lead to an increase in patronage at the station so, even with the provision of an alternative entrance, there is not likely to be a reduction in passengers using the main entrance.	None
9	New homes need to be built with a distinctive character and to highly sustainable standards.	Noted. The importance of quality sustainable design of new buildings is discussed in the Vision for the Mead Lane area on page 38 of the draft UDF. The retention of heritage assets as noted in paragraph 7.7 will also assist in creating an area which is locally distinctive.	None
9.1	This is a semi-rural area therefore further strengthening of the urban character will be detrimental to the character of the area.	All of the areas that are being brought forward for development have previously been in employment use and are	None

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		industrial in nature. Much of the site is currently vacant, damaged and underused. Suitable development will recycle valuable urban land and enhance the character of the area while making a contribution to identified housing and employment needs.	
9.2	There is general and specific support in favour of low rise developments to reflect the broader character of Hertford as a market town.	The UDF indicates that new development in the Mill Road area should be restricted to a maximum of three and a half storeys in height. However the height of buildings needs to be considered on a site specific basis depending on individual circumstances.	None
9.2	Some support for taller buildings on the western, Mill Road, side of the site.	Noted	None
10.2	It is agreed that a broader range of uses other than employment is required to bring forward key sites.	Support noted and welcomed.	None
10.2	The UDF makes no connection to the way in which development in Mead Lane may impact on the town centre.	It is not considered that development proposed in this area would impact	None

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		negatively on the town centre. The UDF seeks to maintain existing employment uses in the area while providing new residential dwellings on vacant or underused parts of the site. The Mead Lane area is in an edge of town centre location and therefore within easy walking distance of the services and facilities located there. Development in the Mead Lane area is therefore likely to support the social and economic function of the town centre rather than be detrimental to it. Any commercial space provided in this location would be of a small scale and would not impact upon the vitality of the town centre	
10.5	The building scale of 3 and a half storeys on this site is too high and may lead to the perception of enclosure on the street.	The UDF indicates that new development in the Mill Road area should be restricted to a maximum of three and a half storeys in	None.

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		height. However the height of buildings needs to be considered on a site specific basis depending on individual circumstances.	
10.5	Concern that height limitations cannot be justified by the level of new adjoining development.	The UDF indicates that new development in the Mill Road area should be restricted to a maximum of three and a half storeys in height. However the height of buildings needs to be considered on a site specific basis depending on individual circumstances.	None
10.6	Consideration needs to be given to the location of the new bridge as local residents have expressed significant concern that opening up the area near The Waterfront will adversely impact on resident's privacy and security. This could also lead to further anti-social behaviour which has been minimised with work from the Hertfordshire Constabulary.	Technical difficulties identified with the bridge suggested in the draft document at the end of the Waterfront development are currently unable to be resolved so will be unable to be progressed at this stage. However, Herts County Council is currently developing proposals to replace the existing bridges at the end of Mill Road with	None

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		<p>structures suited to all user groups.</p> <p>The Council will work with developers through the planning application process to ensure that the design of new developments reduces the possibility of anti-social behaviour and crime in accordance with Para 58 of the NPPF and the principles of the 'Secured by Design' initiative as outlined in paragraph 8.6.2 of the adopted Local Plan.</p>	
10.6	The Environment Agency would like to be involved in the design of the new bridge as any proposal for widening the existing bridge could have an adverse effect on the biodiversity.	HCC will be responsible for the design and delivery of the new bridge and it is anticipated that liaison with the Environment Agency would feature in the development of any proposals.	None
10.6	Objection to the proposed cycle/pedestrian link between Hartham Common and Hertford East. Shared cycle and pedestrian links do not work and are dangerous to pedestrians.	It is considered that pedestrian/cycle friendly routes are a highly effective option for delivering	None

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		sustainable transport principles. Every effort will be made to reduce conflict between different users although limitations of space may mean compromises have to be made.	
10.8	There is general and specific concern surrounding the impact further development will have on congestion. The A414 and the southern area of Mill Road leading up to Ware Road already suffers from heavy congestion especially at peak times. Will the proposed development/regeneration not serve to increase this congestion?	Reducing congestion is a key consideration for the UDF and is linked to the outcomes of the Mead Lane section of the Hertford and Ware Urban Transport Plan (UTP). Chapter 8 of the UDF, 'Movement Strategy', identifies the need to incorporate sustainable travel principles and careful street design in order to encourage walking, cycling and use of passenger transport. New walking and cycling routes will therefore be provided. A bus interchange and extended routes will also support the development and offer modal choice. The location	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		<p>of the site close to the town centre and to Hertford East railway station should reduce car usage. In addition, the UDF identifies that a car club could be provided on site. The link road will improve traffic flow on site while the configuration of existing junctions such as Mill Road and Ware Road will be considered through the planning application process.</p> <p>The Council will continue to work with Hertfordshire County Council, Essex County Council and other organisations in order to understand in more detail the potential impacts on the strategic and local highway networks and possible mitigation measures.</p>	
10.8	Concern over the proposal for a 'shared space' in front of the station. Such areas raise issues	The UDF currently proposes a public space in front of the	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	of pedestrian safety	station which would not be accessible to traffic except where emergency access would be required. It is considered that a new public space would improve the environment in that area and enhance the setting of the listed Hertford East station building.	
10.8	Concern about new pedestrian/cycle link between Hartham Common and Hertford East. The proposals would be dangerous for pedestrians and also harm the tranquillity and privacy of the area for existing residents of the new developments. It could also increase levels of anti-social behaviour which is already an issue.	<p>It is considered that pedestrian/cycle friendly routes are the best option for delivering sustainable transport principles. Every effort will be made to reduce conflict between different users although limitations of space may mean compromises have to be made.</p> <p>The Council will work with developers through the planning application process to ensure that the design of new developments reduces the possibility of anti-social</p>	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		behaviour and crime in accordance with Para 58 of the NPPF and the principles of the 'Secured by Design' initiative as outlined in paragraph 8.6.2 of the adopted Local Plan.	
10.8	The new bridge over the river would encourage cyclists to use the towpath down to Hartham Lock which would be dangerous for walkers. The towpath is a statutory public footpath.	Chapter 10, River Lea Corridor Opportunities identifies the potential to widen the towpath in this area to make it more suitable for pedestrians and cyclists and to improve disabled access.	None
10.8	Thought needs to be given to the height of buildings in the Mill Road area so as not to affect the setting of Hertford East.	The UDF indicates that new development in the Mill Road area should be restricted to a maximum of three and a half storeys in height. However the height of buildings needs to be considered on a site specific basis depending on individual circumstances. The setting of the listed Hertford East station building	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		is important and the UDF suggests enhancing this through the provision of a new public space and improved public access.	
10.8	It is not realistic that the link road and bus interchange could be paid for by development value.	The link road and bus interchange will be delivered as part of a development that was granted planning permission subject to S106 in July 2014.	None
10.9	Marshgate Drive is not a 'strategic route' but more a quiet residential street whose environmental quality will not be improved by this proposed high density development.	Marshgate Drive is considered to be a strategic route in the context of this site. Pedestrian and cycle links will connect Hartham Common and the Meads with the town centre and Hertford East but will also provide the main vehicular access to the western end of development off Marshgate Drive.	<u>Paragraph 10.9, final sentence:</u> The design of the road should be inviting and attractive <u>to all users, and reflect that this is part of a</u> reflecting the fact that this is a strategic <u>pedestrian and cycle</u> route directly linking Hartham Common and Kings Meads to the town and station.
10.9	The placing of residential units at the beginning of the new road at Marshgate Drive immediately abutting employment premises could be problematic.	A key consideration will be reducing potential conflict between employment and residential uses. A B1 (office) buffer will separate	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		residential and other potentially non neighbourly uses	
10.10	How will it be possible to reduce flood risk by increasing the storage capacity of the flood plain if the level of development proposed is implemented?	The UDF proposes that, where possible, the areas of functional flood plain that directly front onto the river could be used for public spaces which would enhance the environmental quality of the area and help to reduce flood risk. In addition, innovative design of new developments will be expected including basement parking.	None
10.10	The requirement for Marshgate Drive to accommodate on-street parking, widened footpaths and a road layout that allows circulatory traffic will potentially result in a wide highway corridor and a street scene dominated by highway infrastructure.	It is considered that the street scene at Marshgate Drive would be greatly enhanced by the widening of the road and the provision of parking, wide pavements, street trees and appropriate landscaping. The design would need to be agreed through the planning application process.	None
10.10	The provision of new community facilities	Noted. Paragraph 10.9	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	within the Marshgate Drive area would be welcomed.	suggests that community uses could be appropriate in this area.	
10.10	Footpath widths on Marshgate Drive are adequate and don't require widening. The road is also of sufficient width and there are already trees present. These proposals would also reduce the potential development area.	It is considered that the street scene at Marshgate Drive would be greatly enhanced by the widening of the road and the provision of parking, wide pavements and appropriate landscaping. The design would need to be agreed through the planning application process.	None
10.10	There is no need for new employment space. Existing space provides useful low rent industrial premises. New premises are likely to be high cost.	The UDF places great emphasis on the retention of existing employment space and it is acknowledged that the smaller, low rent premises perform an important function in the local area. The provision of new employment space on vacant or underused land would provide an enhanced offering of new, modern facilities that would benefit the local economy and help	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		to meet the draft District Plan requirement to provide 9,700 jobs between 2011 and 2031. New employment provision on brownfield land also negates the need for potential greenfield releases.	
10.11	The River Lea and its surrounds should be considered as an entity and not just a boundary for development. With this in mind careful consideration should be given to the height and orientation of any new residential development along the navigation.	<p>The UDF indicates that new development in the Mill Road area should be restricted to a maximum of three and a half storeys in height. However the height of buildings needs to be considered on a site specific basis depending on individual circumstances.</p> <p>Due consideration should be given to the river and any proposals affecting it as reflected in Paragraph 10.11</p>	None
10.11	There shouldn't be development along the whole edge of the navigation. Any development should be low level and set back from the riverbank.	It is considered that providing residential development along the river on existing vacant or underused areas would improve the setting and	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		provide a stronger frontage. Development would be broken down into different components and would not form one continuous block. The UDF does support the provision of public spaces immediately next to the river in order to enhance the natural environment and increase the storage capacity of the floodplain.	
10.11	The towpath should not be widened. Cyclists should be banned from the towpath in order to ensure the safety of walkers.	The Council supports considerate use of the towpath by both walkers and cyclists. Widening the towpath would help facilitate this.	None
10.11	The UDF states that the River Lea corridor cannot accommodate residential development due to flood risk. However the majority of the Dicker Mill site is within Flood Zones 1 and so is appropriate for residential use. The remainder of the site is in Flood Zone 2 and is therefore suitable for employment uses without having to apply the sequential test.	Dicker Mill is north of the river and it is not considered that a mixed use re-development of this site would be in conformity with Policy HE5 and Policy EDE1. It is considered that these smaller units provide an	7 th Sentence of Paragraph 10.11: Flooding considerations <u>may restrict residential development options in this area subject to the application of the sequential test and, if necessary, the exception test.</u> are also likely to restrict any residential options.

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		important local employment function in the town. The Employment Land Review Update (2013) concludes that the employment function of the Dicker Mill site should be retained.	
10.12	Improved lighting beside the Hertford basin might improve safety in the area at night.	Noted. There are no specific proposals to address this issue at present although it could be considered in due course outside of the UDF. Any proposals would need to be in conformity with the requirements of Policy ENV23 of the adopted Local Plan (2007).	None
10.12	Concerns over the effects the 'floating café/restaurant' concept may have on the biodiversity. Also, the channel of the River Lea has been defined as Flood Zone 3b therefore by PPS25 only water compatible development is acceptable within this area. Consideration would also need to be given to disabled users.	A floating café/restaurant should by nature of its design not be at risk from flooding. The impact of the proposal on biodiversity and potential access issues for disabled users would need to be considered should such a proposal come forward.	None
10.12	The proposal that the new Green Space	Support noted and	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	should be focussed primarily along the Lea is welcomed as this should enhance the value of the Lea as a wildlife corridor.	welcomed	
10.12	The aims of the UDF are in accordance with the TCPA Policy Advice Note on 'Unlocking the potential of the inland Waterways through the Planning System'.	Support noted and welcomed.	None
10.14	There is already a pavement on the north side of Mead Lane. A pedestrian/cycle route on the south side is not necessary.	The provision of a 3 metre wide route on the south side would prevent difficulties between different users and would enhance the setting for walkers and cyclists and provide alternative routes and form part of the wider pedestrian and cycle network.	None
11	The importance of retro fitting existing development to help meet the target of reducing carbon emissions is not mentioned	Retrofitting is an important issue and homeowners and business owners should be encouraged to undertake works to their premises. However, the UDF seeks to address sustainable design in new developments.	None
11.1	The low-energy Passivhaus standard is a more appropriate standard than the Code for	The Council is unable to require sustainability	<u>Amendments to Para's 11.1, 11.3 and 11.4</u>

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	Sustainable Homes and BREEAM.	standards through the UDF which are not in accordance with policies in the Local Plan Second Review. The Government's consultation on the Housing Standards Review in 2013 suggested incorporating sustainability standards within Building Regulations. Given the current uncertainty with initiatives and standards such as the Code for Sustainable Homes, it is considered that Chapter 11 should be amended to be less specific while still encouraging development to be highly sustainable.	11.1 Developers of new housing areas will be <u>encouraged</u> expected to achieve a <u>high level of sustainable design in accordance with nationally recognised standards such as the</u> Code for Sustainable Homes, <u>BREEAM and Passivhaus</u> . Level 4 within the new developments. This shall be based on energy and water efficiency and include incorporation of renewable energy provisions and sustainable drainage systems. <u>The use of SUDS will be expected to achieve on-site 1 in 100 year climate change attenuation will also be encouraged.</u> Subject to the overall coherence of design, the incorporation of green roofs will be promoted to foster sustainable drainage, heating and cooling benefits and biodiversity. Commercial developments will be required to meet appropriate BREEAM standards.
11.1	Support for implementing relevant BREEAM standards for commercial development.		
11.1	There is no explanation as to why Code Level 4 is referenced and not a more onerous level.		11.3 A sustainability statement setting out the provisions and standards to be achieved will be

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
			<p>required to be submitted with planning applications. Developments shall be certified by approved assessors. 11.4 <u>In considering the design of new developments, regard should be had to</u> The Building for Life <u>12 standard</u>. Code will also provide a main standard reference for the development of the area. While the highest standards are promoted, all applications for new developments shall be submitted with assessments and it is expected that these will achieve a minimum silver standard of 14 points or above. Under this national scheme developers are then granted the standard to advertise the quality of their designs.</p>
11.2	The use of CHP within the development area would be welcomed. However, if there is more than one developer involved with the site this may not get delivered.	Noted. While there are multiple landowners across the area as a whole, it is hoped that sites can be brought forward together to create a comprehensive development and it remains an ambition that	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		technologies such as CHP and district heating could be delivered.	
11.2	If district heating was to go ahead, what actions would the Council take to help deliver this?	The Council would need to work with applicants during the planning application process to explore the feasibility of delivering a scheme of this nature.	None
11.3	Assessment criteria need to be published and the term 'approved assessors' needs to be defined.	It is not considered necessary to include criteria and standards within the UDF which sets the design context for development. Both the Building for Life and BREEAM standards are nationally recognised schemes and information on the requirements and the way in which they are assessed are easily accessible online.	None
11.8	Concerns over the proposed increase in S106 payments in the Mead Lane area over and above what will be expected elsewhere. The Council needs to provide more clarity as to how improvements will be delivered. The cost of remediation added to S106 payments and	The Planning Obligations SPD will generally provide the basis for calculating contributions. Paragraph 2.10.9 of the	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	affordable housing provision may make development unviable.	<p>adopted Planning Obligations SPD states that:</p> <p>The standard charges presented here are not a “tariff” or “levy” but rather a “framework for negotiation” (Circular 05/2005 Paragraph B33), providing “quantitative indications of the level of contributions likely to be sought”. Planning applications will be considered as a whole and on a case-by case basis, without “blanket” application of charges. This will take into account viability constraints of a site (see section 7.8 on viability) and the benefits of development proposals’.</p> <p>Negotiations with applicants at the planning application stage will be required in order to ensure that viable schemes are delivered that meet the aims of the UDF</p>	

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
11.8	'Agreed independent assessor' needs to be defined.	The assessor would need to be agreed with the applicant so no further definition is considered necessary.	None
12	The Council should use this UDF to develop an innovative, cost effective response to the twin challenges of climate change and peak oil.	The UDF supplements saved policies contained within the adopted Local Plan which includes policies which seek to mitigate climate change. Chapter 2 of the Local Plan seeks to address issues impacting on sustainable development at the local level. Chapter 11 of the draft UDF also identifies the importance of implementing a high standard of sustainability within new development. However, the UDF cannot require sustainability standards that go beyond those contained within the adopted Local Plan.	None
12.3	Concern regarding level of need for a new hotel. It would also be out of keeping with the current scale of building on the site.	Reference to a hotel should be removed from the UDF following approval of a planning application for 107	<u>Paragraph 2.2. bullet point 15:</u> Diversifying the uses within the area to limit peak hour traffic congestion including the potential provision of a

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		<p>dwelling and a commercial unit on the site.</p>	<p>hotel, retail <u>commercial space</u> and increased leisure space; and other measures to address local congestion and capacity issues.</p> <p><u>Figure 9</u> Remove reference to 'New Station Hotel'.</p> <p><u>Paragraph 10.5, 1st sentence</u> This will be predominantly residential with potential opportunities for a range of other commercial uses such as retail <u>and</u>, restaurant uses, and a hotel opposite Hertford East Station.</p> <p><u>A Vision for the Mead Lane Area (Page 38)</u></p> <p>The site adjacent to Hertford East station is highlighted as being well suited for a hotel use, a new Station Hotel reinterpreting an historical pattern. This must be fully explored as a development option.</p> <p><u>Figure 14</u> Remove reference to 'Hotel'.</p>

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
12.3	Concerns about the necessity to have a bus link on site	Providing a bus service within the site should reduce car usage and therefore ease congestion problems as a key component of modal shift.	None
12.3	Commercial and residential traffic should be separated as much as possible. At present the main route through the site serves both commercial and residential areas. A through road could access the employment areas while a shared surface access could serve the residential areas facing the river.	Given the access constraints to the Mead Lane area, it is difficult to separate commercial and residential traffic. However, widening of streets and provision of links roads will allow traffic to flow more easily on the site. The implementation of sustainable travel principles should reduce the amount of car usage on site. It is anticipated that 80% of commercial traffic to Mead Lane will use the link road.	None
Figure 1	General support for rejuvenating this part of Hertford although low rise buildings may be more appropriate.	Support noted and welcomed. The UDF indicates that new development in the Mill Road area should be restricted to a maximum of	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		three and a half storeys in height. However the height of buildings needs to be considered on a site specific basis depending on individual circumstances.	
Figure 5	Figure 5 should show the land occupied by the Scout group as being in community use as Figure 8 does.	Figure 5 only shows current land use designations as identified on the adopted Local Plan Proposals Map	None
Figure 6	It is agreed that the edges of the river are not well defined and that development would visually improve the area.	Noted.	None
Figure 7	The diagram does not show walking times for getting to school. It is considered that residential development will lead to greater car usage which will put pressure on local roads, particularly as local schools are at capacity and pupils may have to travel further afield.	The Council is currently preparing a new District Plan which will allocate sites for development for the period up to 2031. As part of the evidence base for this work, discussions are ongoing with Hertfordshire County Council in order to understand education requirements in Hertford and the rest of the District. This critical issue will therefore be addressed through the preparation of the District Plan rather than	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		<p>the UDF in isolation. The proposals for the expansion of Simon Balle School to become an All Through facility are expected to form a planning application in autumn 2014. This will meet the primary education needs of development in the Mead Lane area.</p> <p>Any planning application would need to submit a Transport Assessment and a Travel Plan where issues such as this should be explored with HCC as Highway Authority.</p>	
Figure 8	The Hertford Scout group would like to work with the Council to see if there are ways that their site could be enhanced for the benefit of the community.	Noted although this would be considered separately from the UDF.	None
Figure 9	The construction of a hotel is not necessary. A large branded hotel would also be detrimental to the character of the local area.	Reference to the construction of a hotel should be removed following granting of permission for 107 dwellings and a commercial unit on the site.	See changes proposed on under Paragraph 12.3

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
Figure 9 & 10	The enhanced access links between the town, Mead Lane site and the adjacent section of the Lea Valley are welcomed	Noted	None
Figure 9	Well defined borders to the river are not required. A new basin cut into the gas works site would be supported if done sympathetically and did not harm existing use of the river.	<p>The Council considers that a stronger frontage would enhance the setting of the river. At present vacant and underutilised sites provide an unpleasant aspect to the Lea.</p> <p>Reference to the basin and floating café on Figure 9 should be changed to be less prescriptive about what could be delivered in that area.</p>	Change reference to New Canal Basin – Floating ‘Pop Up’ café to ‘Enhanced water frontage/uses’.
Figure 10	Objection to a pathway or cycleway to waterfront development.	<p>This link provides a key element of the sustainable transport principles which will serve the site. Improving pedestrian and cycle links between Hartham Common, the Meads and the town would be beneficial.</p> <p>Technical difficulties identified with the bridge</p>	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		suggested in the draft document at the end of the Waterfront development are currently unable to be resolved so will be unable to be progressed at this stage. However, Herts County Council is currently developing proposals to replace the existing bridges at the end of Mill Road with structures suited to all user groups.	
Figure 10	The single access into the site is problematic and junctions need to be modified. The new link road is not necessary – if the current bend in the road is not safe then this should be improved. The land allocated to a new road could then be used for station parking.	The link road is an integral part of proposals and development could not proceed without it in order to comply with the Hertford and Ware UTP criteria. The link road formed part of a planning application which was approved subject to S106 in July 2014.	None
Figure 12	The proposed buildings are too high and not in keeping with the rest of the area.	UDF indicates that new development in the Mill Road area should be restricted to a maximum of three and a half storeys in	None

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
		height. However the height of buildings needs to be considered on a site specific basis depending on individual circumstances.	
Figure 12	The current building height of the Hertford Scout Group premises is noted but it is hoped that this would not have to be maintained as eventual expansion of the facility is desired.	Noted. The UDF does not seek to prevent future expansion of this facility and the figure is a visual representation of existing building heights in the area.	None
Figure 14	Objection to proposal for new bridge as access to Hartham Common is adequate using existing bridges. Privacy of residents would be impacted upon.	Technical difficulties identified with the bridge suggested in the draft document at the end of the Waterfront development are currently unable to be resolved so will be unable to be progressed at this stage. However, Herts County Council is currently developing proposals to replace the existing bridges at the end of Mill Road with structures suited to all user groups.	None
Figure 14	The UDF is an SPD to the adopted Local Plan. It cannot legally propose different allocations of	Policy HE5 of the adopted Local Plan allows for a	Changes to chapter 11 are detailed under Paragraph 11.1 above.

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	<p>land than that contained within the Local Plan. An Area Action Plan should be prepared instead. Similarly, it cannot propose sustainability standards in excess of those contained in the Local Plan i.e. Code Level 4 and Building for Life Silver standard.</p>	<p>mixed use development of the site provided that the issues in Paragraph 12.3.12 of the Local Plan can be resolved. The SPD is therefore in accordance with the adopted policy.</p> <p>The adopted Local Plan is now several years old and does not identify sustainable design standards which should be met. The Council cannot seek to enforce standards given the lack of such a policy in the Local Plan but developers should be encouraged to deliver sustainable development standards providing it is financially viable to do so.</p>	
Figure 14	<p>The area currently designated for employment use should instead be allocated for a mix of uses in order to allow redevelopment of the site to take place. B uses on their own are not viable at present. The Dicker Mill site is particularly suitable for a mixed use site.</p>	<p>Policy HE5 of the adopted Local Plan allows for a mixed use development of the site east of Marshgate Drive. The SPD is therefore in accordance with the adopted policy.</p>	None
Figure 14	<p>The industrial buildings at Dicker Mill are now</p>		

Paragraph No:	Summary of Issues Raised	Officer Response	Proposed Amendment to UDF
	insufficient and contribute little to the local economy. The site would benefit from a mixed use redevelopment.		
Figure 14	Re-development of Dicker Mill as a mixed use scheme would bring multiple benefits in a sustainable location. It would create a more attractive frontage and also help to provide better crossing points and access to Hartham Common.	Dicker Mill is north of the river and it is considered that a mixed use re-development of this site would not be in conformity with Policy HE5 and Policy EDE1. The Council considers that these smaller units provide an important employment function in the town.	

Other amendments required

Paragraph No:	Issue	Proposed Amendment to UDF
8.3	Weblink to 'Roads in Hertfordshire, Highway Design Guide' is out of date	<u>Amendment to 3rd and 4th sentences:</u> Local guidance in the form of Hertfordshire County Council's 'Roads in Hertfordshire, Highway Design Guide 3 rd Edition', should also be taken into account and is available to view at: http://tinyurl.com/67of3tu http://www.hertsdirect.org/services/transtreets/devmanagment/roadsinherts/ .
8.8	Reference to a renewed franchise in 2013 is out of date.	<u>Amendment to paragraph 8.8:</u> It is noted that the Greater Anglia rail franchise, which covers Hertford East Station, is due for renewal in 2013. The expectation is that, due to the Government's franchising policy, any new franchisee will have greater incentive to secure investment in its stations and it is hoped that this will provide an opportunity to achieve a new focus for both the station and the local train service.
10.11	British Waterways is now known as the Canal & River Trust.	<u>Amend 4th sentence:</u> Such an initiative would be welcomed by British Waterways the Canal & River Trust and would be consistent with advice contained in its Policy Advice Note: Inland Waterways, Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System available to view at http://tinyurl.com/3gftnue .
11.5	Weblink to Manual for Streets in Hertfordshire is out of date	http://tinyurl.com/67of3tuit http://www.hertsdirect.org/services/transtreets/devmanagement/roadsinherts/
11.6	Weblink and reference to 'Quality	<u>Amend paragraph:</u>

	Bus Stops' document is out of date	Likewise, the design principles for bus provision within the area are set out in Hertfordshire County Council's ' Bus Infrastructure in Hertfordshire – A Design Guide (available at www.hertsdirect.org/docs/pdf/b/businfrainhertsDG) . Quality Bus Stops – Design Guidelines' (available at: http://tinyurl.com/69vlwb4) . However, it should be noted that this 2004 publication is currently being updated and will be re-issued shortly.
11.7	Reference to Local Transport Plan 2 is out of date and reference to consultation on Rail Strategy and Bus Strategy should be changed.	Hertfordshire County Council also has an adopted Rail Strategy and Bus Strategy, which are linked to the Local Transport Plan 2006/07 – 2010/11 (LTP 2 ³). In line with the superseding of LTP2 with LTP3, it is planned that public consultation on a revised Rail Strategy and Bus Strategy (and accompanying Intalink Strategy), as daughter documents, will take place in 2011. The contents of the se finally agreed Rail and Bus Strategies should be taken into account in any new development proposals for the Mead Lane area.
11.8	Reference to Circular 05/2005 is out of date.	It is anticipated that, under the terms of Circular 05/2005, pooled contributions may be necessary in order to achieve all of the aims of the UDF.
Figure 4	Figure is out of date	Update Figure 4 to reflect current position with regard to permissions and completions.
Figure 7	Reference to Sainsbury's should be updated.	Changed from 'Sainsbury's Opening 2012' to 'Sainsbury's'
Figure 10	Location of bus stops and Passenger Transport Interchange to be changed	Bus stop shown on Mill Road to be removed and most northerly bus stop moved to the left side of the link road. Location of Passenger Transport Interchange should be updated to reflect the recent planning permission.
Figure 12	Building heights should be updated to reflect current construction on former TXU site	Figure 12 updated to include building heights for the former TXU site which is currently under construction.

Figure 14	The reference to hotel/restaurant should be removed from the key to reflect the recent planning permission	Change annotation for number 3 on the key from 'Hotel/Restaurant/Residential' to 'Residential/Commercial'.
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Local Plan Second Review 2007
Supplementary
Planning Document

Mead Lane Urban Design Framework

Planning Policy Team
December 2014
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1 Introduction

- 1.1** Within the County town of Hertford, the Mead Lane area is situated to the east of the town centre and provides one of its largest and most valuable employment resources (see **Figures 1 and 2**). However, within this location lie some of the town's largest undeveloped brownfield sites. Some of the traditional uses of the area, including Gas Storage facilities and Sewage Filter beds, long since ceased operation and other elements of the employment offer have become outdated. In recent years there has been a steady improvement in the employment space offer, especially at the eastern end, and some residential redevelopment has taken place towards the western end of the area.
- 1.2** Disconnected by the Hertford East to London (Liverpool Street) railway line that bounds its south side, the area has struggled to realise its full potential, mainly due to restricted vehicular access issues. However, the area is in other respects well connected by proximity to the town centre, a nearby superstore, a railway station with a service to central London, and by access to the River Amenity corridor of Hartham Common and Kings Meads. The remaining underdeveloped areas provide the opportunity to create an outstanding mixed use environment to benefit the town.
- 1.3** While a few recent developments, including The Waterfront and The Meads apartments, have been constructed as stand-alone initiatives, it is considered that a framework is now required to ensure that a well integrated plan is delivered for the remaining areas of opportunity.



The Waterfront, Mill Road



Figure 1: Location Plan



Figure 2: Mead Lane in Hertford

2 Aims and Objectives of the UDF

2.1 The broad aims of the Urban Design Framework are:

1. To ensure a high quality regeneration of the Mead Lane area;
2. To reintegrate the area with the wider town;
3. To ensure development is based on principles of Sustainable Development.

2.2 More specific objectives of the UDF (in no order of importance) will be:

1. The general uplift to the public realm, streets and river corridor through the Mead Lane area;
2. Promoting the amenity and recreational value of the Hartham Common Area with enhanced connectivity;
3. New pedestrian/cycle friendly routes throughout the Mead Lane area and enhanced links to the surroundings, such as a link from Hertford East Station to Hartham Common and the National Cycle Network Route 61, the existing crossing at Rowleys Road and improved access to the route of the Lea Valley Walk;
4. Designing residential roads to achieve 20mph standard;
5. Promoting the attractiveness of the River Lea navigation by enhanced built form with frontages in positive relationship to the river;
6. Retaining as many existing employment operations as possible (beyond Marshgate Drive) and flexibility of use within the B1, B2 and B8 use classes in those areas to be retained primarily for employment use while enhancing opportunities for new employment as part of mixed use proposals in those areas identified for redevelopment;
7. Designing any residential development to ensure that existing commercial enterprises are not jeopardised;
8. Creation of welcoming public spaces, as a priority to include, inter alia, an enhanced setting to Hertford East Station at the gateway to Mead Lane;
9. A sustainable travel strategy for the whole area;
10. New passenger transport provisions including improved bus stops and links to Hertford East and within the wider employment area;
11. Provision of a new road link to the north of Hertford East Station to the junction with Marshgate Drive and provision of a secondary emergency access in the Hertford East Station frontage area;
12. Provision of a new road link across the former Gas Storage site as part of the redevelopment of that site to enable circulatory traffic movements (in particular for buses) within the overall area;
13. Highway improvements to Marshgate Drive to promote its shared use;
14. Provision of on-street parking spaces for car club usage;

15. Diversifying the uses within the area to limit peak hour traffic congestion including the potential provision of commercial space and increased leisure space; and other measures to address local congestion and capacity issues;
16. Improving pedestrian connections between Hertford East Station, its surroundings, and the town centre;
17. Sustainable management of surface water and reduction of flood risk in new developments.

2.3 The Urban Design Framework will achieve these objectives by:

1. Identifying established patterns and environmental and heritage assets;
2. Assessing the constraints and opportunities of the area;
3. Outlining different urban character areas to ensure distinctiveness within the development;
4. Guiding the physical form, design and uses for key sites and areas;
5. Promoting sustainable movement networks to optimise the quality of life for residents and businesses;
6. Highlighting the public realm, key public spaces and facilitating its enhancement;
7. Setting high design and sustainability standards.



Former TXU site, Mead Lane

Town and Landscape Features Mead Lane, Hertford



Hertford East Station -
Fine Heritage, Poor Setting



“The Waterfront” - First flatted
scheme. Elevation to Mill Road



The Waterfront -
Enhanced Riverside



The Meads - Mead Lane



River Lea Navigation -
Bisects Mead Lane Area



Hertford Lock -
Lea Valley Beyond



Folly Island -
Nearby Victorian Streets



Dicker Mill -
Starter Employment Units



Centrus, Mead Lane -
Modern Business Investment

3 Context

- 3.1** East Herts Council has for many years supported the regeneration of the Mead Lane area; however, long-standing access difficulties have, until recently, prevented the achievement of this objective.
- 3.2** One main obstacle was the need for a second point of vehicular access for emergency purposes coupled with the effects of additional peak time traffic on the wider road network. A potential solution, involving the construction of a bridge over the railway line from Rowley's Road to the eastern end of the employment area was rejected by both district and county councils due to environmental impact, effect on residential amenity, cost, and land take on the employment site (due to ramping).
- 3.3** These access difficulties in turn stymied the progression of a draft Development Brief for the area in 2003, which had been prepared by consultants on behalf of a potential developer. Full details on the consideration of this issue can be found in the report to the Council's Executive 27/04/2004 (<http://online.eastherts.gov.uk/moderngov/CeListDocuments.aspx?Committeeld=119&MeetingId=977&DF=27%2f04%2f2004&Ver=2>).
- 3.4** In 2008 work commenced on the development of the Hertford and Ware Urban Transport Plan (UTP), which was commissioned by Hertfordshire County Council, as Highway Authority. Within the overall context of the Plan a sub-study element was included to cover the access impediments, the solution of which would allow the potential redevelopment of the Mead Lane area. This study concluded that, subject to various measures being undertaken as part of the redevelopment of the area, the access difficulties could be surmountable. The Mead Lane subsection of the UTP is available at Appendix E and can be viewed via the following URL: <http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/handwutp.pdf>. The Hertford and Ware UTP was formally adopted by the County Council in November 2010, with the full endorsement of East Herts Council.

4 Historical Development Patterns and Uses

- 4.1** At the beginning of the 20th century the Mead Lane area was largely undeveloped. The main building within the area was Dicker Mill sited along the River Lea, the remnants of which remain today. Hertfordshire's first gasworks were established in Hertford at the end of Marshgate Drive (formerly Gashouse Lane) in 1825.
- 4.2** A station was first constructed in the Mead Lane area in 1843, with the current Hertford East Station being built in 1888. The former Dolphin public house was also constructed at the same time. A plan showing the area at around this time is available at **Figure 3**.
- 4.3** During the 20th century the area became developed for gas storage and water treatment, although by 1958 gas production had ceased. The Mead Lane area had previously been encroached by the cutting of the River Lea Navigation when it was extended from Ware to Hertford in 1769.
- 4.4** As the twentieth century progressed, the area saw a steady extension of development for employment purposes, firstly around Marshgate Drive, and, since the 1980's, larger modern units have been laid out in areas along Mead Lane, Merchant Drive and Fountain Drive.
- 4.5** Also in the 1980's, a proposal to promote a northern relief road that would have cut across the northern edge of the Mead lane area and bridged the railway line (which had been promulgated from the 1960's onwards and related to the construction of the A414 southern relief road in Hertford at Gascoyne Way) was ruled out on cost and environmental grounds. The previously safeguarded land was subsequently released and significant sections of that land have since been redeveloped. The scheme is therefore no longer considered to represent either a viable or feasible option.
- 4.6** Since the Millennium, the former East Herts Council depot at Mill Road has been brought forward for redevelopment as The Waterfront to provide housing that now presents a far more attractive edge to the Hertford River Basin.
- 4.7** More recently, housing development has also been completed at the former TXU site – The Meads apartments. This provides a similarly high density development of mostly apartments for private sale and affordable housing. The buildings are designed to overlook the primary public corridor of the River Lea navigation and Mead Lane (see **Figure 4**).

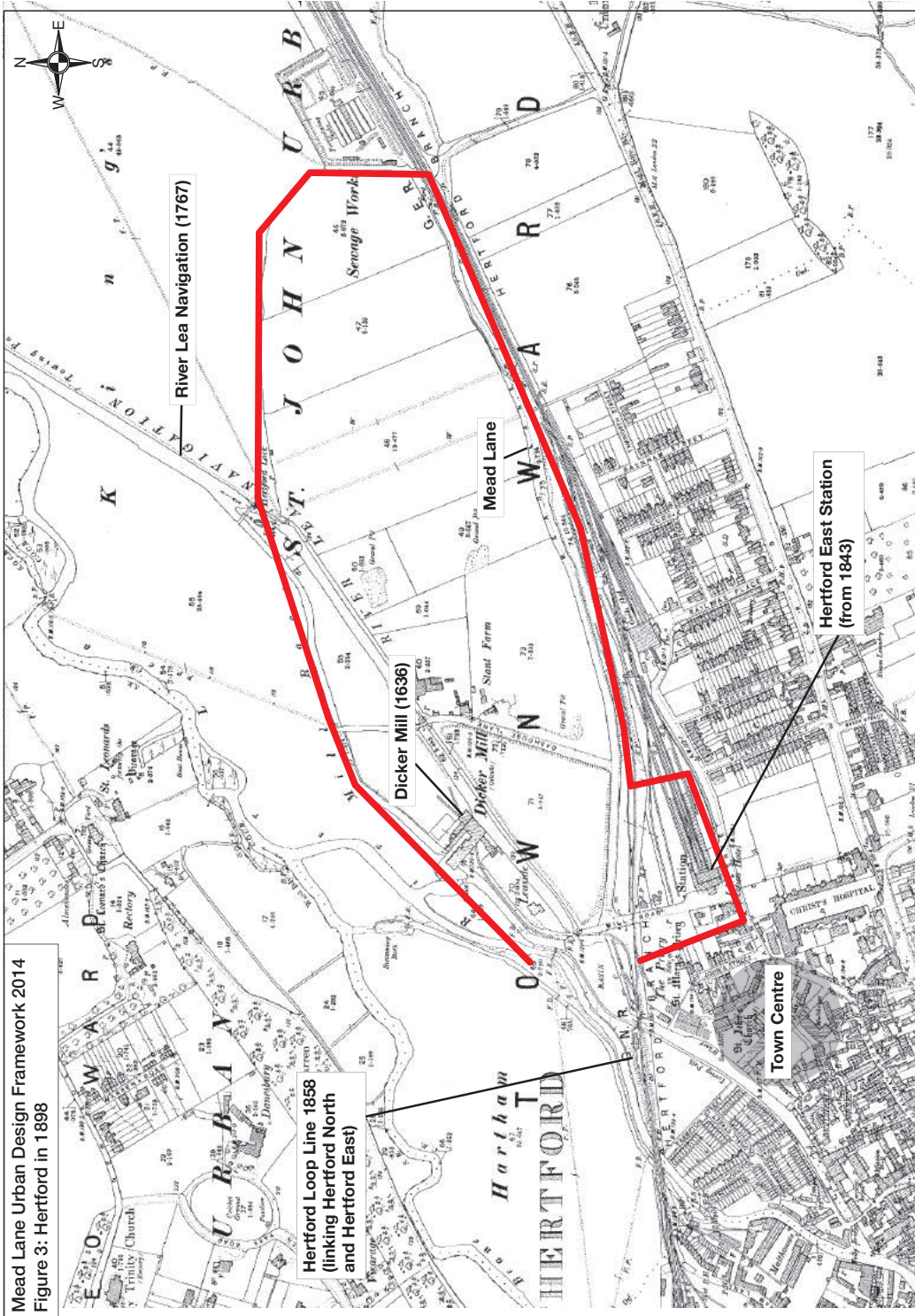


Figure 3: Hertford in 1898

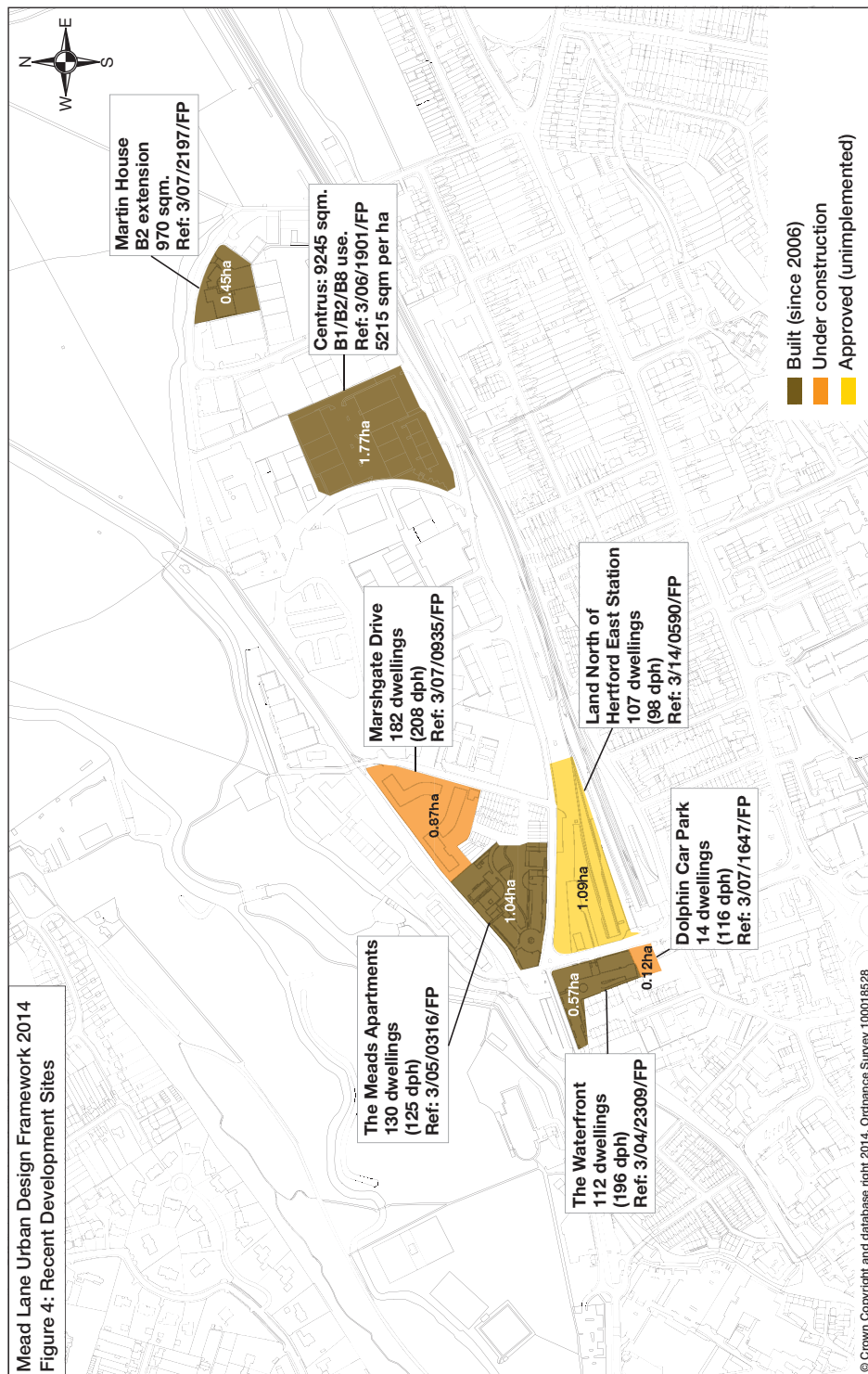


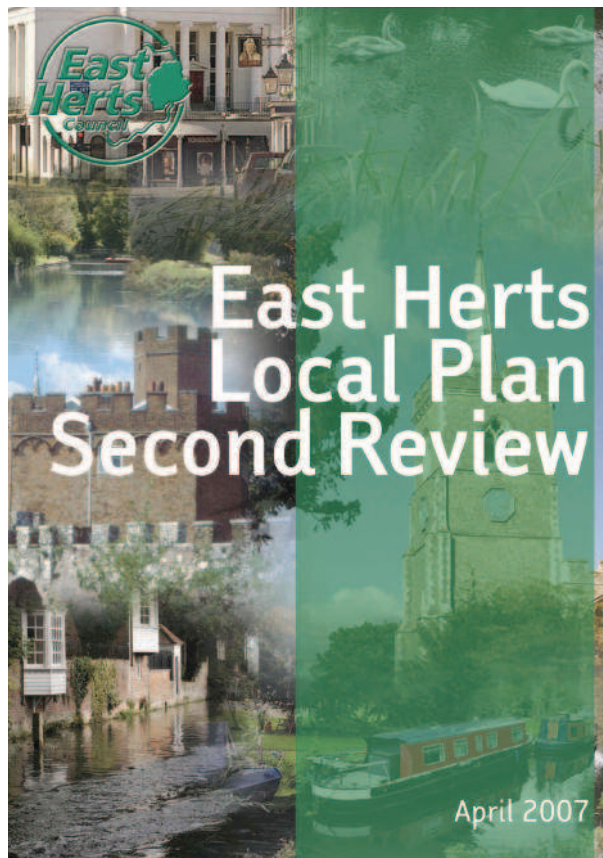
Figure 4: Recent Development Sites

5 Planning Policy Context

5.1 National planning guidance is contained within the National Planning Policy Framework and the associated Planning Practice Guidance. A number of national policies are of relevance to any development proposals in the Mead Lane area.

East Herts Local Plan, Second Review, April 2007 (Saved Policies)

5.2 The main policy considerations of the East Herts Local Plan, Second Review, April 2007 (Saved Policies), with regard to the Mead Lane area, are identified below (the full Written Statement of this Local Plan is available on the East Herts Council website at www.eastherts.gov.uk/localplan)



Relevant Local Plan (2007) Policies

SD1 Making Development More Sustainable
SD2 Settlement Hierarchy
SD3 Renewable Energy
HSG1 Assessment of Sites not Allocated in this Plan
HSG3 Affordable Housing
HSG4 Affordable Housing Criteria
HSG6 Lifetime Homes
TR1 Traffic Reduction in New Developments
TR2 Access to New Developments
TR3 Transport Assessments
TR4 Travel Plans
TR7 Car Parking Standards
TR8 Car Parking – Accessibility Contributions
TR12 Cycle Routes – New Developments
TR13 Cycling – Facilities Provision (Non-residential)
TR14 Cycling – Facilities Provision (Residential)
EDE1 Employment Areas
STC1 Development in Town Centres and Edge-of-Centre
ENV1 Design and Environmental Quality
ENV2 Landscaping
ENV3 Planning Out Crime – New Development
ENV18 Water Environment
ENV19 Development on Land Liable to Flood
ENV20 Groundwater Protection
ENV21 Surface Water Drainage
ENV24 Noise Generating Development
ENV25 Noise Sensitive Development
ENV18 Water Environment
LRC3 Recreational Requirements in New Residential Development
HE5 Mead Lane Area West of Marshgate Drive
HE8 Employment Areas
IMP1 Planning Conditions and Obligations

5.3 A plan showing key policy designations is available at **Figure 5**.

5.4 SPDs that should also be taken into consideration include: Affordable Housing and Lifetime Homes, 2008; Open Space, Sport and Recreation, 2009; Planning Obligations, 2008; and Vehicle Parking Provision at New Development, 2008, which are also available on the East Herts Council website.

Technical Studies

- 5.5** In February 2008 East Herts Council commissioned Halcrow to undertake an assessment of existing areas of employment land and future employment land requirements for the District. This study will form part of the evidence base for the Council's emerging District Plan.
- 5.6** In relation to the Mead Lane area, the Study, which was published in October 2008, identified the Marshgate Drive Employment Area as “a good candidate for redevelopment to B1 if demand for B2 uses declines”. Merchant Drive is subject to the same prognosis. This supports the continuing policy emphasis that the areas be retained and developed for employment use. Although the adjacent Dicker Mill area was detailed as being of average overall quality it was recognised that “it serves the needs of smaller occupiers in Hertford”. The full Employment Land and Policy Review 2008 is available to view on the East Herts website at: <http://www.eastherts.gov.uk/index.jsp?articleid=15660>.
- 5.7** The Strategic Flood Risk Assessment which was completed in November 2008, is also relevant to the Mead Lane area in that part of the site is within designated Flood Zones 2 and 3. This will need to be considered as part of any development proposals with the sequential test applied as appropriate.

Other Policy Information

- 5.8** Prior to the adoption of the East Herts Local Plan, Second Review, April 2007, the whole of the Mead Lane area had been designated for employment use within previous Local Plans, although there were existing pockets of residential development within it. The adoption of the 2007 Local Plan resulted in a planning policy context that permitted the residential redevelopment of areas to the west of Marshgate Drive within the Mead Lane Employment Area, under Policy HE5, with potential scope for redevelopment to the east of Marshgate Drive, subject to meeting certain criteria. This also supported the preparation of a Development Brief (at paragraph 12.3.12).

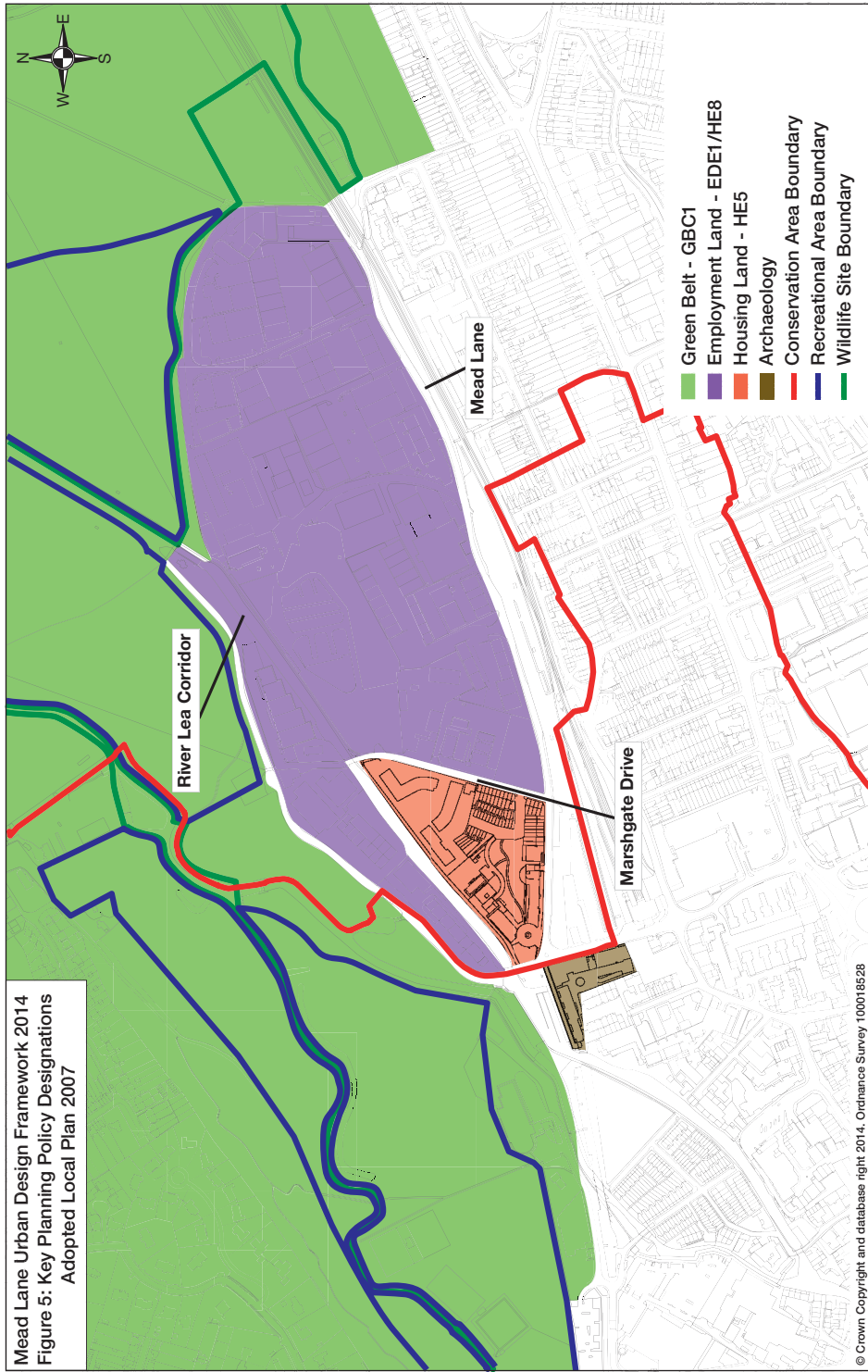


Figure 5: Key Planning Policy Designations Adopted Local Plan 2007

Problem Situations Mead Lane, Hertford



Congested Industrial Sites



Conflicting Uses
- Poor Image



Wasted Land
- The Sidings



Narrow River Crossing Points



Steps
- a barrier to movement



Domestic Scale Streets
- industrial use

6 Constraints

- 6.1** The perceived constraints to the area are identified in **Figure 6**. These include the physical and environmental constraints of poor townscape, dereliction and land contamination & remediation, flood risk, noise pollution, as well as traffic hazards, road restrictions and obstacles to movement.
- 6.2** The major constraint in traffic terms is the single entry point from Mill Road, given that this serves such a wide area. The industrial traffic moving into Mead Lane conflicts with residential uses. A good example of where such conflicts are most acute is within the narrow street of Marshgate Drive. Mead Lane itself also experiences problems with speeding traffic and the route around Mill Road includes a bend of very restricted visibility. Noise pollution, due to the volume and types of traffic using this area, is also of particular concern.
- 6.3** The access to the recreational area of Hartham Common is constrained by the narrowness of bridge crossings and the steep steps are an obstruction to the movement of pedestrians, cyclists and those with disabilities or people using pushchairs.
- 6.4** The Mead Lane area is blighted by the undeveloped areas within it and there is clearly a design opportunity for new development to address the lack of enclosure by buildings and street form.
- 6.5** While certain locations have benefited from remediation works in the past, it is noted that a significant amount of contaminated land remains within the Mead Lane area which will need addressing prior to redevelopment.
- 6.6** Some businesses in the employment area have the scope to function on a 24/7 basis and noise attenuation is an issue that must be addressed in any new development to ensure that the successful continued operation of existing concerns is assured.
- 6.7** The location of residential dwellings within Flood Zone 3b would be contrary to the policies contained within the NPPF. Following the sequential approach, residential development should primarily be located in Flood Zone 1 with its vulnerability taken into account if development is proposed in Flood Zone 2 or 3.

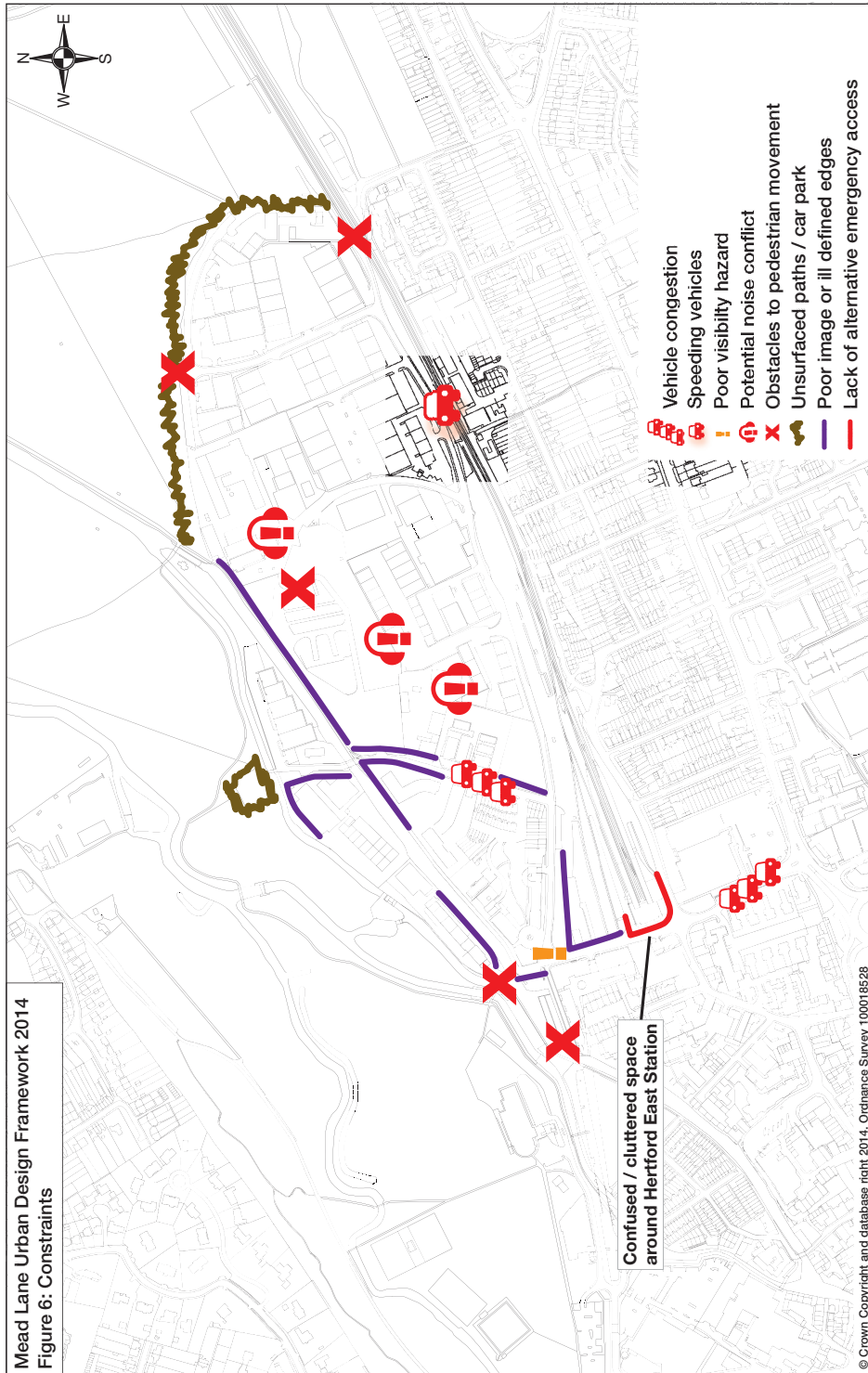


Figure 6: Constraints

7 Opportunities

- 7.1** There are widespread opportunities for the better use of land, visual enhancement and highway and access improvements throughout the area. Amongst other improvements, key aspects include the provision of a passenger transport interchange at the Hertford East end of the development; a road link as part of the redevelopment within the former Gas Storage site to enable circulatory traffic movements (in particular for buses); riverside improvements; and a footbridge to Hartham Common. These exploit the locational advantages of Mead Lane and its proximity to services, amenity areas and public transport.
- 7.2** The western end of the Mead Lane area is in close proximity to the main urban generators of activity, the Town Centre, Hertford East Station, and Hartham Leisure Centre. **Figure 7** illustrates which parts of the area are within 10 minutes walk of the town centre, the station and nearby existing food stores.
- 7.3** A major environmental asset for the site is the river corridor of the River Lea. A key design objective is to make the most of this amenity for residents, businesses and informal recreation (it lies on the route of the river walk from Hertford to Ware). The quality of new development and the wider built environment will be key to the improvement of this asset.
- 7.4** The Mead Lane area also lies adjacent to one of Hertford's 'Green Fingers', which are essentially countryside wedges of open undeveloped land that penetrate towards the centre of the town. The Hertford Civic Society's publication 'Hertford's Green Fingers' (2004) (available to view at: <http://www.eastherts.gov.uk/index.jsp?articleid=24830>), describes the unique quality of this vital environmental asset and provides a sound basis for offering opportunity for the integration of any new development into the wider locale, particularly the Kings Meads and Hartham Common areas within the River Rib environment. Ecological quality is also of particular importance in the context of the overall river corridor setting.
- 7.5** Although the area is not one of historic development and therefore does not contain many heritage assets, the Grade II listed building of Hertford East Station, constructed in 1888, provides a southern gateway to the area (see **Figure 8**) and is particularly significant due to its role and historic character. The UDF seeks to ensure that new development makes the most of this asset making improvements to the setting of public space around the station. Likewise, the former Dolphin public house opposite the station and constructed in conjunction with it, is also Grade II listed and adds environmental quality to the area. Both buildings lie within the Hertford Conservation Area. Along the Hertford East Line lies a Grade II listed signal box (with consent to be relocated).

- 7.6** Hertford East Station should be maintained as an operational railway station with a full range of facilities for access, including car parking, facilities for disabled and mobility impaired people. The development of further opportunities for access by sustainable modes (e.g. buses, taxis, cycling and walking) is strongly supported.
- 7.7** Other historical rail-related features of interest, including the rails which are embedded into the road surface on the bridge to Dicker Mill and at Mead Lane, should be retained wherever possible in order to contribute towards the creation of a unique sense of place in this area via new development proposals. The potential for archaeological finds should be considered as part of development proposals in consultation with Hertfordshire County Council's Archaeology section.
- 7.8** A number of key public routes, spaces and sites where opportunities exist to enhance the design of the built environment and improve the way they work have also been identified and these are illustrated in the attached **Figure 9**. By developing the specific qualities of each place the area will thereby evolve a distinctive character.
- 7.9** The key opportunity routes within the Mead Lane area include:
- Mill Road
 - Mead Lane
 - Marshgate Drive
 - River Lea navigation
- 7.10** Key opportunity sites include:
- Hertford East Sidings
 - National Grid
 - Marshgate Drive
 - Dicker Mill

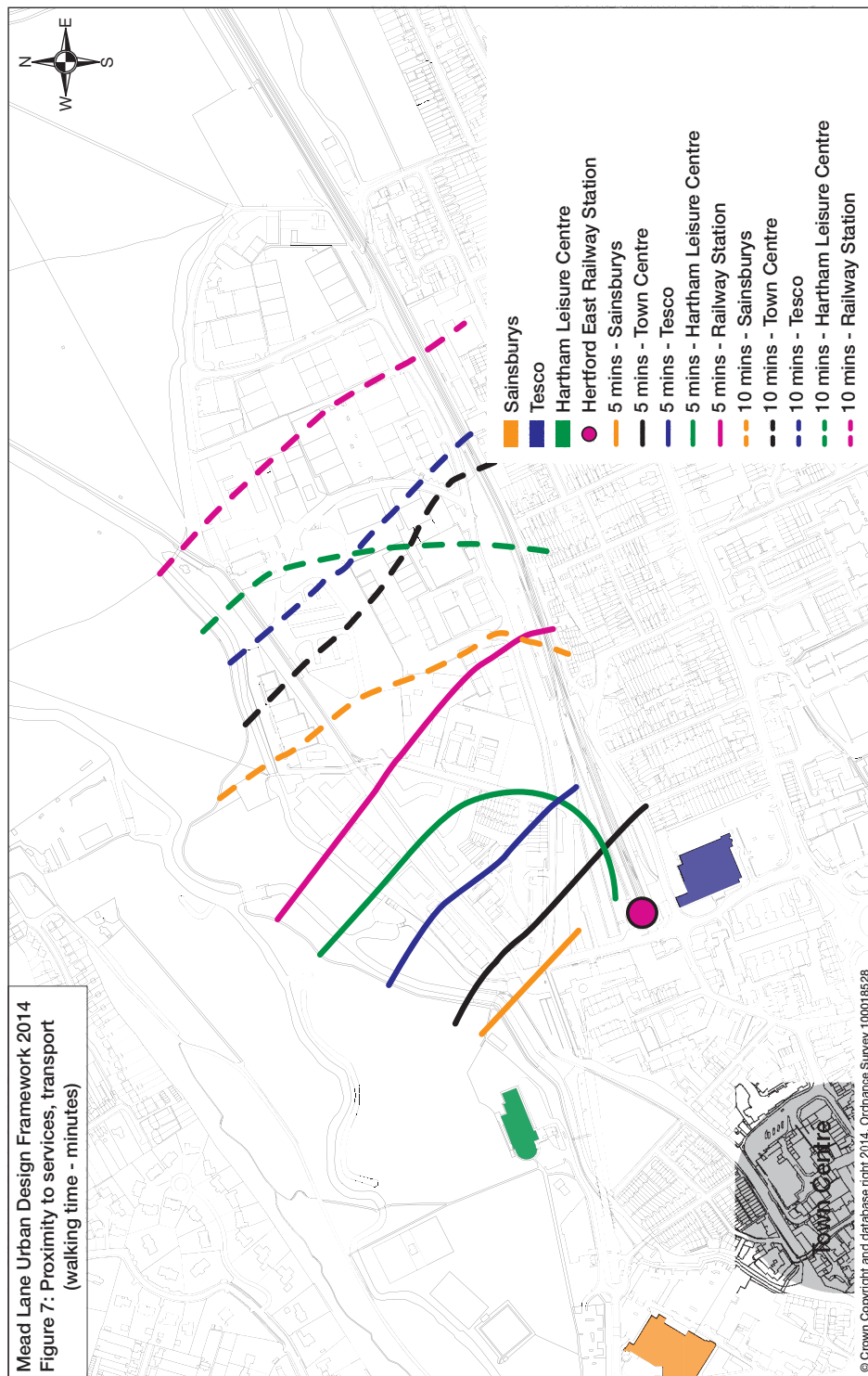


Figure 7: Proximity to services, transport (walking time - minutes)

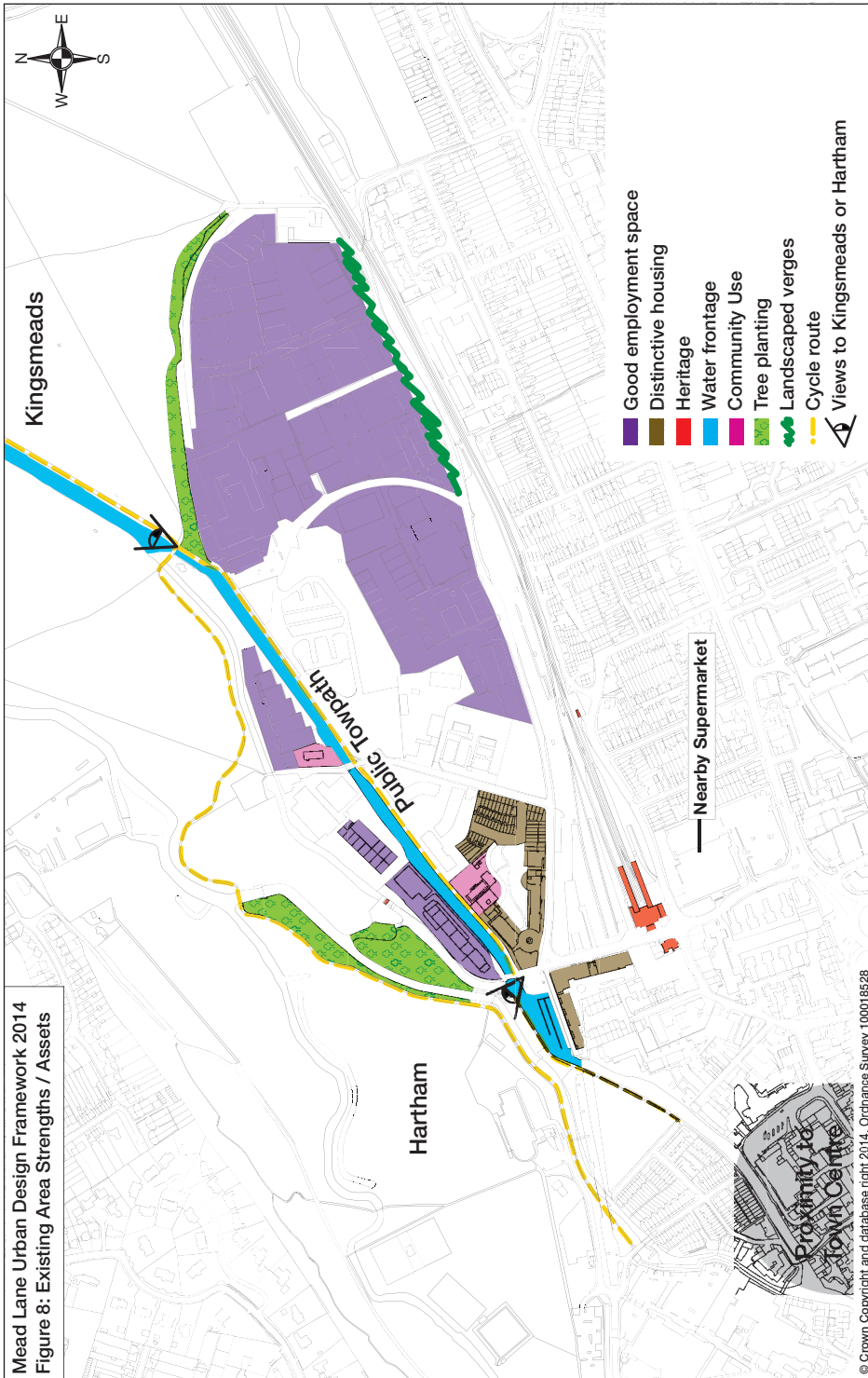


Figure 8: Area Strengths/Assets

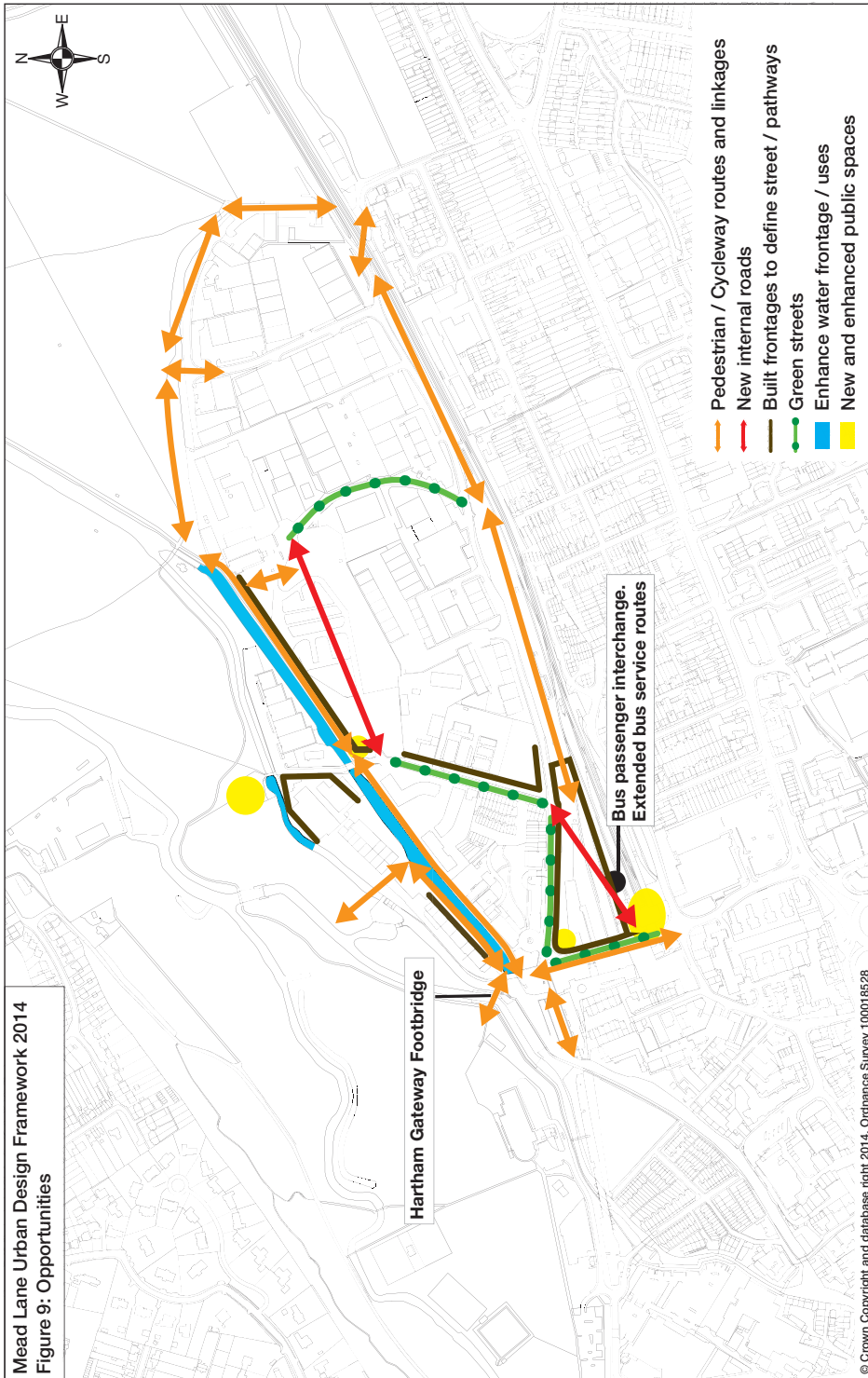


Figure 9: Opportunities

8 Movement Strategy

- 8.1** Drawing on the principle of access highlighted in the Hertford & Ware UTP, the area appraisal (in **Figures 6, 7, 8 and 9**), and by application of sustainable travel principles to all new development, the UDF identifies a movement strategy for the area at **Figure 10**.
- 8.2** Sustainable Travel Principles: The development of the Mead Lane area shall include sustainable travel principles so as to maximise the potential for walking, cycling and passenger transport and minimise the impacts of excess car use.
- 8.3** National guidance in Manual for Streets supports by evidence what is commonly understood, that the quality and design of the built environment has a major influence on people's decisions on whether to walk. Similarly, this is the case for cycling and passenger transport. Local guidance in the form of Hertfordshire County Council's 'Roads in Hertfordshire, Highway Design Guide 3rd Edition, should also be taken into account and is available to view at: <http://www.hertsdirect.org/services/transtreets/devmanagment/roadsinherts/>. Local guidance for passenger transport provision is available via Hertfordshire County Council's website at: <http://tinyurl.com/5tbbev>. The UDF will place importance on promoting the design of the built environment to further the aims of sustainable travel.
- 8.4** In relation to the use of cars, initiatives will be introduced and extended for car sharing and car clubs via Green Travel Plans and S106 obligations. The Mead Lane area is considered suitable for car clubs with initial investment required to start up any scheme. It is anticipated that a six car scheme could be supported by the area to serve incoming residents and would also be open to existing communities to join. Any low car parking regimes will be mitigated by the use of on street parking controls. Essential spaces for parking and servicing should be provided, in accordance with the Vehicle Parking Provision at New Developments SPD (available to view at: <http://www.eastherts.gov.uk/vehicleparking>), but they must not be allowed to dominate the layout of new developments or undermine the quality of the built environment. Good design will be important in supporting the principles of promoting sustainable travel in the Mead Lane area.
- 8.5** The UDF will facilitate the provision of a second emergency access by Hertford East Station, a passenger transport interchange, the new link road, extended bus service provision within the area, and the promotion of pedestrian and cycling routes which are endorsed within the Hertford and Ware Urban Transport Plan, 2010.
- 8.6** The western end of the Mead Lane area is in close proximity to the main urban generators of activity, the Town Centre, Hertford East Station, and Hartham Leisure Centre. **Figure 7** illustrates which parts of the area are within 10 minutes walk of the town centre, the station and nearby existing food stores.

Development of the Mead Lane area would offer opportunities for improvement to walking and cycling links between the destinations and wider environs, such as Ware.

- 8.7 There may be opportunity for a Sustainable Travel Plan to be carried out in conjunction with a Station Travel Plan for Hertford East Station, as many of the access issues and opportunities will be common to both locations. This would also help inform the requirements for future development of station access (e.g. additional cycle and car parking, pedestrian routes and new bus services).



Hertford East station

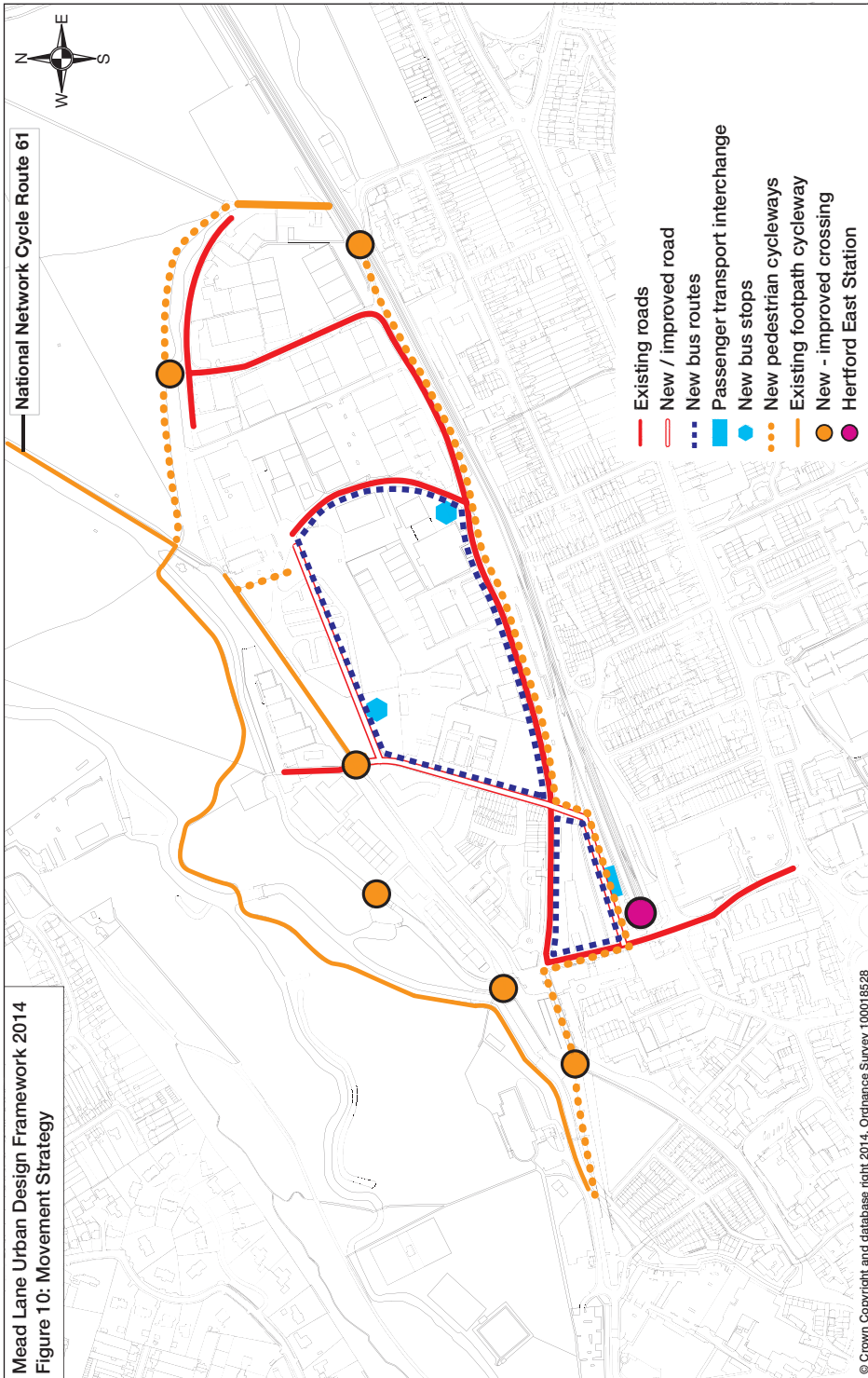


Figure 10: Movement Strategy

9 Built Form

- 9.1** The development of sites within the Mead Lane area will be expected to strengthen the urban form which, as a result of large undeveloped areas, is presently quite weak. This is revealed by the Ground Figure Plan for the area (**Figure 11**). While the structure of streets and spaces, the urban morphology of the town centre and nearby residential areas and streets is quite clearly defined, the area of Mead Lane is rather devoid of such structure and the character of the area is poorly defined and diminished accordingly. The framework will be a means to provide this much needed structure.
- 9.2** Scale: The scale of building should reflect the broader character of Hertford as a market town and be generally low to medium rise with good street enclosure. Other factors to influence the design of the built form will be the pattern of uses, surrounding townscape, accessibility and location. The existing plan of building heights show some established variations (**Figure 12**). So, for instance, higher density forms will appropriately locate to the western end of Mead Lane on sites which are more accessible to Hertford East Station and the town centre.



The Meads from the River Lea



Figure 11: Ground Figure Plan

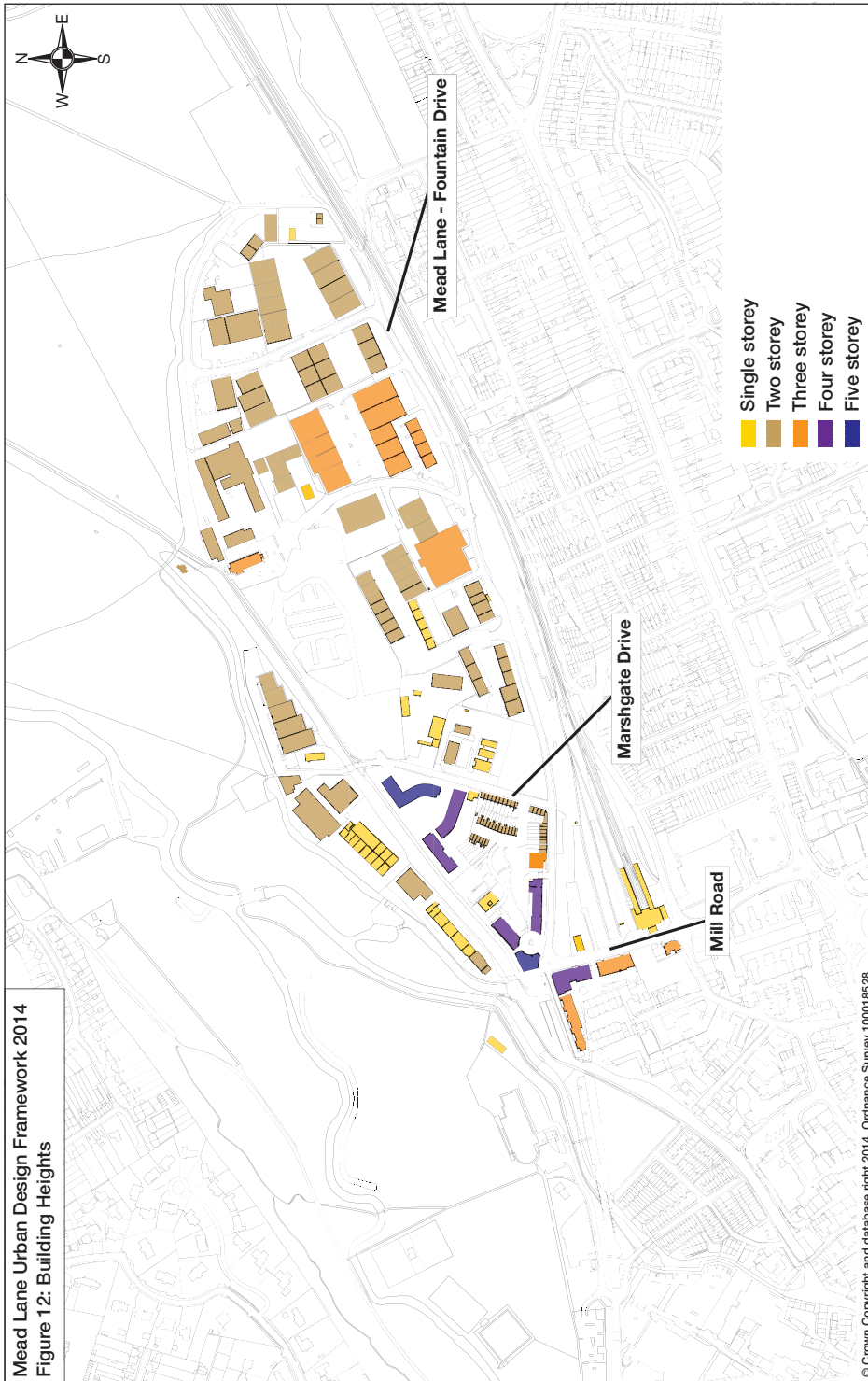


Figure 12: Building Heights

10 The Main Character Areas

- 10.1** The Framework seeks to identify and then reinforce distinctive urban character areas within the Mead Lane Area (see **Figure 13**).
- 10.2** The eastern area of Mead Lane/Merchant Drive/Fountain Drive is established employment space (Area 4) with few vacant sites and therefore will remain largely unchanged, although it will benefit from the transport infrastructure of the UDF. Outside of these general areas, it is expected that most other areas will result in a greater mix of uses, although the balance within them will vary. In general, the UDF seeks to secure the retention and enhancement of Mead Lane as an attractive employment area retaining a good quality offer for local businesses. However, it is recognised that a wider range of uses will be necessary to bring forward key sites, make the best use of urban land and achieve the broader design aims of the UDF. This will be in accordance with the provisions of adopted local plan policies. A wider range of uses will also provide a more balanced pattern of movement into and out of the area and increases the activity and vitality of the place.
- 10.3** The introduction of any residential use must always be carefully considered in relation to existing businesses and should not be developed in a way that would prejudice their normal operations and employment activity.
- 10.4** The principal character areas identified (**Figure 13**) are:
1. Mill Road
 2. Marshgate Drive
 3. River Lea corridor
 4. Mead Lane/Merchant Drive/Fountain Drive
- 10.5** **1 - Mill Road:** This will be predominantly residential with potential opportunities for a range of other commercial uses such as retail and restaurant uses. The built form should provide a perimeter block of higher density and result in a clear street structure with good connection to and overlooking of walking routes. Building heights will vary from generally two and a half storeys to three and a half storeys. Corner locations on Mill Road will provide a focus for longer views so must be soundly derived and show attention to detailed design.
- 10.6** A priority link to bring forward is that between Hertford East Station and the National Cycle Network Route 61 at Hartham Common. This should include a 3m pedestrian/cycleway and a new bridge crossing wider than existing and avoiding the barrier of steps. Due to changes in level and the number of linkages, this bridge will be of bespoke design. An architectural competition will be expected to provide a worthy design for what should be a local landmark and gateway between Hartham Common and Mead Lane.

10.7 Public frontages and elevations should reflect themes within the site surroundings and be attractively proportioned and interesting. The main roads will be designed with a strong landscaped structure, “green streets” of high amenity, to be particularly encouraging for walking and cycling.

10.8 Mill Road Opportunities – The UDF seeks that new development will bring forward/support the following public benefits:

1 - Mill Road Opportunities

1a – provision of a new link road and passenger interchange north of Hertford East station (precise locations to be determined);

1b – provision of secondary point of access solely for emergency vehicle use at the frontage of Hertford East Station;

1c – provision of public space within an enhanced setting of Hertford East Station, including improved pedestrian access from the station towards the town centre;

1d – pedestrian/cycleway link between Hartham Common and Hertford East Station including a new landmark crossing of the River Lea;

1e – completion of the bridge link from Hartham Car Park to The Waterfront following the old railway route;

1f – a pocket garden, open space opposite the Hartham Common entry;

1g – active built edges and uses around the Station and main roads;

1h – an extension of bus routes into the area;

1i – options for a modest expansion of station car parking, subject to evidence of demand, and increased cycle parking provision;

1j – a comprehensively planned approach to the area of land between Mead Lane and the Railway line.

10.9 2. Marshgate Drive: mixed employment and residential areas, with some community uses incorporated and public spaces along the river to enhance the quality of the environment. The street will be widened and formed by development on its east side with space for generous footways, street trees and on street residents and car share/car club parking. The design of the road should be inviting and attractive to all users, and reflect that this is part of a strategic pedestrian and cycle route directly linking Hartham Common and Kings Meads to the town and the station.

10.10 Marshgate Drive Opportunities – The UDF seeks that new development will bring forward/support the following benefits:

2 - Marshgate Drive Opportunities

- 2a – improved footpath widths and provisions for local parking;
- 2b – a widened road for improved access and space for street trees/verges;
- 2c – improved surfacing and landscaping of the Kings Mead car park;
- 2d – a well defined street character;
- 2e – new good quality employment spaces as well as residential uses;
- 2f – road layout that allows circulatory traffic movements (in particular for buses) throughout the wider area;
- 2g – reduction in flood risk by increasing storage capacity of the floodplain where possible.

10.11 3 - The River Lea Corridor: the character of this area will be linear and mostly defined by the water corridor of the River Lea navigation and the way in which buildings and uses are designed around and respond to it. It will provide a mixed employment and residential area with leisure and community spaces. The towpath corridor along the south side of the river, which forms part of the Lea Valley Walk, will be upgraded and widened and the attractiveness of its setting reinforced. Such an initiative would be welcomed by The Canal and River Trust and would be consistent with advice contained in its Policy Advice Note: Inland Waterways Unlocking the Potential and Securing the Future of Inland Waterways through the Planning System available to view at: <http://tinyurl.com/3gftnue>. The careful location of narrowboats and supporting services can provide interest and reinforce the distinctive character of the area. The employment premises along the north side of the river (Dicker Mill) are valuable business spaces that provide scope for meeting the needs of smaller occupiers and it would not be in accordance with adopted local plan policy or the interests of the area as a whole that these be lost. Flooding considerations may restrict residential development options in this area subject to the application of the Sequential Test and, if necessary, the Exception Test. However, redevelopment of units within an employment use category should be encouraged to provide units that meet modern requirements. There may be some scope to improve the river setting through selective redevelopment. Existing community facilities such as the Hertford Scout Group and the Canoe Club should be retained and, where possible, enhanced. In design terms, the Lea and its surrounds should be considered as an entity and not just a boundary for development. New housing should face the navigation and its towpath and any parking should be discrete. The potential for sensitive and appropriate landscaping should be seized.

10.12 River Lea Corridor Opportunities – the UDF seeks that new development will bring forward/support the following key benefits:

3 - River Lea Corridors Opportunities

- 3a – enhanced towpath routes for pedestrians and cyclists and for people with a disability, and better access to the towpath itself;
- 3b – enhanced non vehicular linkages to the employment areas to the south;
- 3c – a resting green space/café/restaurant dining spaces on the river frontage (which could include potential for the introduction of a floating café/restaurant, perhaps provided on a narrowboat/within a newly formed basin);
- 3d – spaces for community use/benefit including support for opportunities to provide for public art interventions;
- 3e – potential for improved public access to north side associated with a new public route to the site of the original Dicker Mill;
- 3f – improved access to passenger transport via related improvements to local road network and provisions to extend bus services;
- 3g – maximise the ecological opportunities from redevelopment and existing land parcels not planned for redevelopment.

10.13 4 - Mead Lane/Merchant Drive/Fountain Drive: large format modern business spaces predominantly in employment use with good road access, notwithstanding congestion at Mill Road entrance. The area is defined by its robust green edges and retains an attractive amount of soft landscaped verges and planting within it too, a feature to be retained and improved. The pedestrian cyclist links to the wider surroundings are good but with much scope for improvement.

10.14 Mead Lane/Merchant Drive/Fountain Drive Opportunities – the UDF seeks that new development will bring forward/support the following benefits:

4 - Mead Lane/Merchant Drive/Fountain Drive Opportunities

- 4a – 3m pedestrian/cycleway to parallel Mead Lane (on south side);
- 4b – increased access to bus services;
- 4c – improved crossing of rail line;
- 4d – improved surfacing and links to connect footpaths and cycleways on Kings Meads;
- 4e – improved vehicle circulation internally to Mead Lane by new circulating road linking Marshgate Drive (east) and Mead Lane.



Figure 13: Character Areas

11 Design and Sustainability Standards

- 11.1 Developers will be encouraged to achieve a high level of sustainable design in accordance with nationally recognised standards such as the Code for Sustainable Homes, BREEAM and Passivhaus. The use of SUDS to achieve on-site 1 in 100 year climate change attenuation will also be encouraged. Subject to the overall coherence of design, the incorporation of green roofs and living walls will be promoted to foster sustainable drainage, heating and cooling benefits and biodiversity.
- 11.2 The Hertfordshire Renewable and Low Carbon Energy Study (2010) identified Hertford as an Opportunity Area for District Heating. Given its town centre location and the potential mix and scale of development, careful consideration should be given to the feasibility of a Combined Heat and Power (CHP) plant integrated with a District Heating scheme.
- 11.3 A sustainability statement setting out the provisions and standards to be achieved will be required to be submitted with planning applications. Developments shall be certified by approved assessors. In considering the design of new developments, regard should be had to the Building for Life 12 standard.
- 11.4 In the design of the public realm and public highways the design principles of Manual for Streets and Roads in Hertfordshire, 3rd Edition (available to view on Hertfordshire County Council's website at: <http://www.hertsdirect.org.services/transtreets/devmanagement/roadsinherts/>), shall be adopted by developers to promote the quality within the whole built environment and promote the area's attractiveness for pedestrians. Particular consideration should be given to lighting arrangements within new developments to ensure that the natural environment of the River Lea and its banks are
- 11.5 Likewise, the design principles for bus provision within the area are set out in Hertfordshire County Council's 'Bus Infrastructure in Hertfordshire - A Design Guide' (available at: www.hertsdirect.org/docs/pdf/b/businfrainhertsDG).
- 11.6 Hertfordshire County Council also has adopted Rail Strategy and Bus Strategies, which are linked to the Local Transport Plan (LTP3). The contents of these Strategies should be taken into account in any new development proposals for the Mead Lane area.
- 11.7 The Policy documents of the East Herts Local Plan, Second Review, April 2007, (Saved Policies), and associated SPDs provide a number of key references, such as the need to provide up to 40% affordable housing within new developments and the requirement to provide a minimum of 15% lifetime homes. S106 obligations will generally be calculated on the basis of the adopted Planning Obligations SPD, taking into account the content of the HCC Toolkit in order to ensure that the full range of requirements are met. However,

it should be recognised that the scope for payments will be increased in the Mead Lane area to ensure that the objectives of the UDF are fully met. Where flexibility is demanded on viability grounds, it will be expected that a full viability assessment will be prepared by an agreed independent assessor. It is anticipated that pooled contributions may be necessary in order to achieve all of the aims of the UDF.

12 Summary - A Vision for Mead Lane

- 12.1** The Mead Lane Urban Design Framework seeks to provide firm guidance within which developers and designers can respond to brownfield development opportunities and provide a high quality, attractive and liveable neighbourhood – an area that is quite distinctively its own place.
- 12.2** It should be recognised that, although short-term economic cycles are experienced, this UDF is concerned with ensuring that a long-term strategy to regenerate the area can be successfully achieved.

Future Visions for Mead Lane, Hertford



Well Connected



Walkable



Green Streets



Well Overlooked - Safe



Liveable



Popular Employment Spaces



Easy Access To Countryside



Sustainable Travel



Neighbourly

- 12.3** Although there are no timescales, the UDF seeks to achieve the following vision and objectives for the Mead Lane area:

A Vision for the Mead Lane Area

Overview

The Mead Lane area will be enlivened by a healthy mix of uses and a network of streets and paths that provide good internal connections, promote walking and cycling and exploit the locational advantages of the area (see Figure 14).

Land Use

As a whole, the area will remain predominantly in employment uses continuing to provide for the towns employment needs. However, there is scope for introducing more residential development with ancillary retail and recreational space.

Accessibility

Traditionally an area isolated by its poor connections, the Design Framework will ensure that links will be improved in part by new roads, but principally by the upgrading and fostering of the sustainable travel choices of walking, cycling, car sharing and improved access to bus and rail services. The framework reflects the evidence that the quality of the built environment can itself promote healthier travel and lifestyle choices. Barriers to movement across the river shall be replaced with new crossing points and the formation of the river corridor area will ensure that the waterways are fully integrated into the area. A new bridge link to Hartham will provide the opportunity for distinctive architecture and a landmark entry into the area from the northwest. The vision will enable the greater balance of journeys to be by sustainable modes and reduce the related impacts of private car use whilst providing for necessary car usage. The new road link north of Hertford East Station will be able to divert more of the industrial traffic away from residential areas while elsewhere improved roads facilitating a greater ease of movement within Marshgate Drive.

Design

Much of the area has been a blank canvas for new development but the framework seeks to ensure that local references are retained and local features exploited in an emerging common language of building. There is no identified need for iconic or landmark tall buildings within the area, although some locations must acknowledge they are the focus for longer views. Architecture of interest and quality, contextual building that respects the town's character and its wider surroundings is sought. In particular, a good street form should be established to give Mead Lane a strong sense of being a worthy destination and place to live, to work and enjoy in its own right.

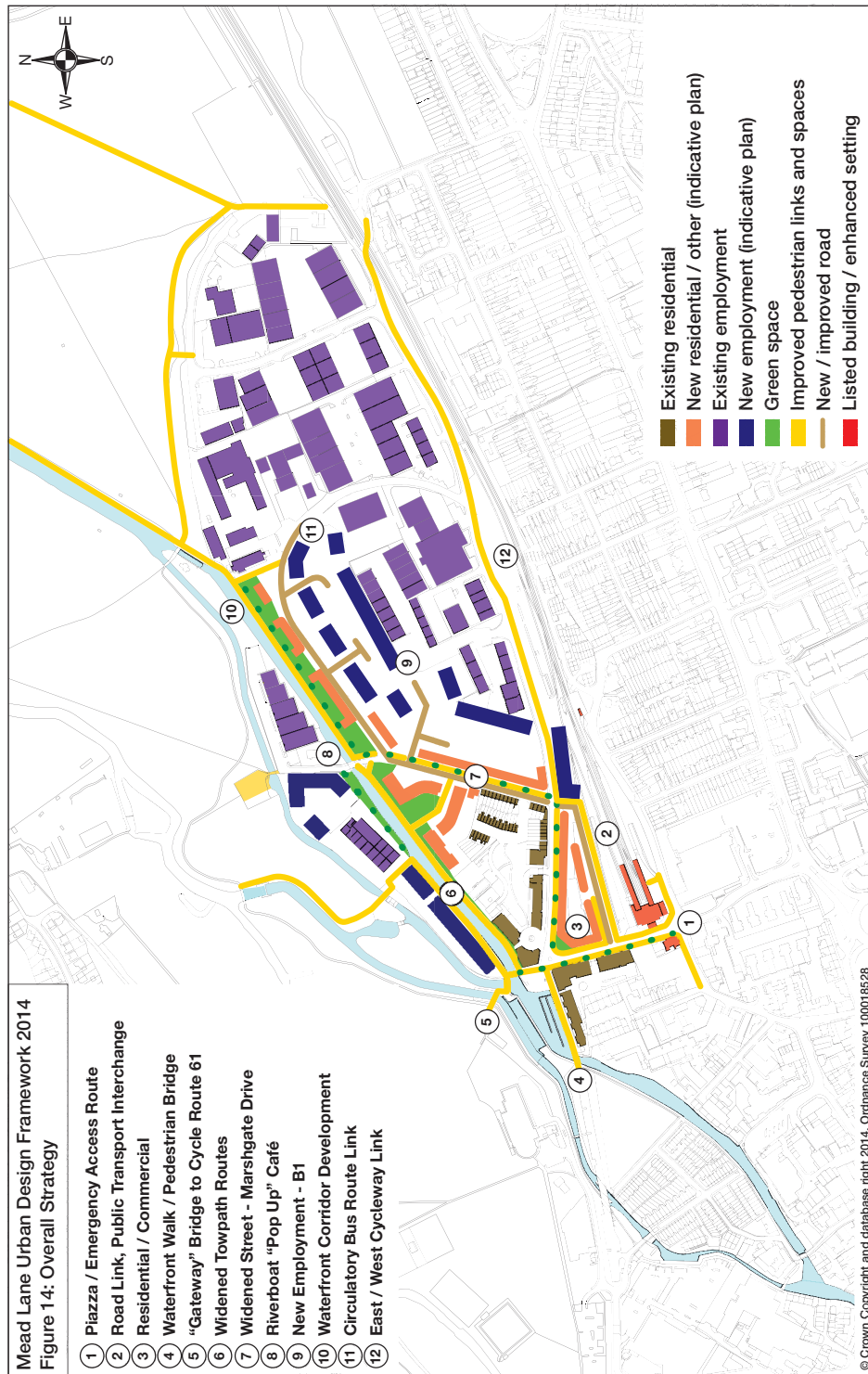


Figure 14: Overall Strategy

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 22 OCTOBER 2014
EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING
AND TRANSPORT

NEIGHBOURHOOD PLANNING GUIDANCE NOTE

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- To seek Members agreement to publish an updated guidance note on Neighbourhood Planning.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL AND EXECUTIVE:</u> That:	
(A)	the Neighbourhood Planning Guidance Note contained at Essential Reference 'B' to this report be noted.
<u>RECOMMENDATIONS FOR COUNCIL:</u> That:	
(A)	the Neighbourhood Planning Guidance Note contained at Essential Reference 'B' to this report be agreed and published.

1.0 Background

- 1.1 Neighbourhood planning was introduced by the Government as part of their broader package of decentralisation measures, enshrined through the Localism Act 2011. The Town and Country Planning England Neighbourhood Planning (General) Regulations 2012 came into force on the 6 April 2012 and prescribe both the process and role of the local planning authority in supporting neighbourhood planning. In East Herts, Town or Parish Councils are qualifying bodies able to produce a Neighbourhood Plan.

- 1.2 Neighbourhood planning allows communities to create a vision and planning policies for the use and development of land within a defined geographical area. This is an opportunity for local people to be fully engaged in the future of their communities in a way that has not previously been possible.
- 1.3 In December 2011 the District Council agreed an Interim Neighbourhood Planning Guidance Note which was circulated to all town and parish councils (see Background Papers). The Interim Guidance Note was based on the Council's understanding of the processes involved in Neighbourhood Planning at the time.
- 1.4 In July 2014 The District Planning Executive Panel considered a further report on neighbourhood planning (see Background Papers) which set out the specific roles and responsibilities of the Council in accordance with the 2012 Regulations. The report also outlined the growing interest in neighbourhood planning across the district.
- 1.5 Given this growing interest it is now considered appropriate to update the Guidance Note to reflect the requirements of the 2012 Regulations and to provide up-to-date support and assistance to those communities interested in doing a Neighbourhood Plan.
- 1.6 A Neighbourhood Planning Member training event took place on Wednesday 8th October. The purpose of the session was to help Members better understand the neighbourhood planning process so that they can also support and advise their communities.

2.0 Report

- 2.1 A copy of the updated Guidance Note is attached at **Essential Reference Paper 'B'**. A number of amendments have been made to the original Interim Guidance Note to reflect the requirements of the Town and Country Planning England Neighbourhood Planning (General) Regulations 2012 and to update and clarify the process and support available.
- 2.2 In particular, the updated Guidance Note:
 - Has been expanded to explain the difference between Neighbourhood Development Orders, Community Right to Build Orders and Neighbourhood Development Plans.

- It now sets out the process for applying to the Council for Neighbourhood Area designation.
- It clarifies the roles and responsibilities of all parties in accordance with the 2012 Regulations.
- It provides an update on Sustainability Appraisal, Strategic Environmental Appraisal and Appropriate Assessment.
- Finally up-to-date information is provided on available support.

2.3 The updated Guidance Note will be sent to all town/parish councils and will assist those already undertaking work on a Neighbourhood Plan; it will also help others decide whether or not they would be interested in developing a Neighbourhood 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

Interim Neighbourhood Planning Guidance Note (December 2011) (East Herts) <http://www.eastherts.gov.uk/index.jsp?articleid=25356>

Neighbourhood Planning (General) Regulations 2012 (DCLG) <http://www.legislation.gov.uk/uksi/2012/637/note/made>

Neighbourhood Planning Update Report (17 July 2014) <http://online.eastherts.gov.uk/moderngov/ieListDocuments.aspx?CId=151&MId=2570&Ver=4>

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IMPLICATIONS/CONSULTATIONS

<p>Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):</p>	<p><i>People – Fair and accessible services for those that use them and opportunities for everyone to contribute</i></p> <p>This priority focuses on delivering strong services and seeking to enhance the quality of life, health and wellbeing, particularly for those who are vulnerable.</p> <p><i>Place – Safe and Clean</i></p> <p>This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p><i>Prosperity – Improving the economic and social opportunities available to our communities</i></p> <p>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>
<p>Consultation:</p>	<p>None</p>
<p>Legal:</p>	<p>None</p>
<p>Financial:</p>	<p>None</p>
<p>Human Resource:</p>	<p>Officer time in undertaking the necessary tasks to update the Neighbourhood Planning guidance note.</p>
<p>Risk Management:</p>	<p>To ensure communities are kept informed and to proactively support communities to develop Neighbourhood Plans, updating the guidance note may enhance communities understanding of Neighbourhood Planning.</p>
<p>Health and wellbeing – issues and impacts:</p>	<p>None</p>

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Neighbourhood Planning Guidance Note (update)

1 Introduction

Background

- 1.1** Neighbourhood planning was introduced by the Government as part of their broader package of decentralisation measures, announced through the Localism Act 2011.
- 1.2** In December 2011 the District Council agreed an Interim Neighbourhood Planning Guidance Note which was circulated to all town and parish councils. The Interim Guidance Note was based on the Council's understanding of the processes involved in Neighbourhood Planning at the time.
- 1.3** On the 6 April 2012 the Town and Country Planning England Neighbourhood Planning (General) Regulations 2012 came into force.
- 1.4** In July 2014 Members considered a report on neighbourhood planning which set out the specific roles and responsibilities of the Council in accordance with the 2012 Regulations. The report also outlined the growing interest in neighbourhood planning across the district.
- 1.5** Given this growing interest the previously agreed Interim Neighbourhood Guidance Note has been updated to reflect the requirements of the 2012 Regulations. This Guidance Note aims to provide up-to-date support and assistance to those communities interested in doing a Neighbourhood Plan.

What is Neighbourhood Planning?

- 1.6** Neighbourhood Planning gives communities the right to shape development through the production of Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders.

- 1.7 Neighbourhood Development Plans** can set out a vision for an area and planning policies for the use and development of land. The advice set out in this Guidance Note relates specifically to the production of Neighbourhood Development Plans.
- 1.8 Neighbourhood Development Orders** can grant planning permission for specified developments in a neighbourhood area. Once established there would be no need for anyone to apply to the Council for planning permission if it is the type of development covered by the order. This should make it easier and quicker for such development to go ahead in the future.
- 1.9 A Community Right to Build Order** is a particular type of Neighbourhood Development Order which provides an enabling right supporting local people to undertake development so that communities are collectively owning, developing and/or managing their own land and developments. As an alternative to the traditional application for planning permission, it gives communities the power to decide for themselves what happens in their neighbourhood.
- 1.10** Each of these routes enables a community to set out guidance and policies to influence development within their communities. Issues such as development, design, transport, local economy, community facilities, within the community can be covered.
- 1.11** It is expected however that in most cases Neighbourhood Development Plans will be produced. This Guidance Note provides up-to-date support and assistance to those communities interested in doing a Neighbourhood (Development) Plan.

What are the benefits of developing a Neighbourhood Plan?

- 1.12** Developing a Neighbourhood Plan can help communities to play a greater role in shaping the future of their area.

- 1.13** It will bring together residents, businesses, local groups, landowners and developers to share ideas and build consensus about what needs to be done in the area.
- 1.14** It can also help create lasting partnerships both within and outside the community, for example with public service providers or local businesses.
- 1.15** Neighbourhood Plans also offers communities an opportunity to include their own local planning priorities within the wider planning system.

Who should be involved?

- 1.16** In East Herts it is anticipated that the majority of Neighbourhood Plans will be initiated by town/parish councils. The Government has also stated that businesses are able to bring forward Neighbourhood Plans.
- 1.17** Town/parish councils should not, however, develop the Neighbourhood Plan in isolation from the rest of the community.
- 1.18** The involvement, throughout the process, of a broad range of local stakeholders will help strengthen community support for the Plan (very important at the referendum stage – see Section 7) and make its implementation easier.
- 1.19** The following is a list of stakeholders that the town/parish council may wish to consider involving in the process:
- Residents
 - Elected representatives
 - Community groups
 - Businesses
 - Landowners

- Developers

1.20 It will also be necessary to involve a range of statutory consultees including Officers from East Herts Council, and other public sector service providers such as Hertfordshire County Council as the highway authority, education authority etc. This might be to provide advice, guidance or information, or to comment on draft documents. The full list of consultees can be found in the [Neighbourhood Planning \(General\) Regulations 2012](#), Paragraph 1 of Schedule 1.

How do you develop a Neighbourhood Plan?

1.21 There is no set process for developing a Neighbourhood Plan although advice and guidance on on-going neighbourhood plans can be found online.

1.22 There are certain elements of the process that are statutory.

1.23 Figure 1 summarises the steps that a ‘qualifying body’ (explained below at paragraph 2.6 onwards) ‘could’ go through to develop a Neighbourhood Plan for their community.

Figure 1: Typical process for producing a Neighbourhood Plan

<p>Getting Started</p>	<p>Get the community on board</p> <p>Establish a steering group</p> <p>Define the ‘neighbourhood area’ and apply for area designation to East Herts Council</p> <p>Produce a programme for developing the plan</p> <p>Develop a communications strategy</p>	<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Strategic Environmental Assessment and Appropriate Assessment if required</p>
<p>Developing a Vision and Objectives</p>	<p>Gather together relevant information</p> <p>Identify the area’s strengths and weaknesses</p> <p>Draft the vision and objectives</p> <p>Check for conformity with the strategic policies in the development plan</p> <p>Check draft vision and objectives with the community</p>	
<p>Developing the Plan</p>	<p>Develop policies</p> <p>Develop an implementation plan</p> <p>Finalise draft of the Neighbourhood Plan</p> <p>Check for conformity with the strategic policies in the development plan</p> <p>Publicise the plan through a 6 week consultation prior to submission to East Herts Council (Reg. 14)</p> <p>Make any necessary amendments from any received feedback</p> <p>Submit to East Herts Council for six week</p>	

	consultation (Reg. 15)	
Independent Examination	Appointment of independent examiner Examiner's report published East Herts Council decides on whether the Plan goes to referendum bearing in mind the Examiner's report	
Referendum	East Herts Council co-ordinates a local referendum	
Adoption	If the referendum indicates community support, then the Neighbourhood Plan will be adopted by East Herts Council	

2 Getting Started

- 2.1** A Neighbourhood Plan should be community led, with the town/parish council in the driving seat. The plan depends on strong local leadership and participation to be successful.
- 2.2** Before work on developing the plan can commence, it will be necessary to do some initial preparation.

Getting the community on board

- 2.3** If the community are not supportive of the idea of a Neighbourhood Plan, right from the start, then it will be extremely difficult to produce a document that properly reflects their priorities and aspirations, and ultimately gets their support at a referendum (see Section 7).
- 2.4** The wider community must therefore be informed of the town/parish council's intentions and be given the chance to get involved from the beginning.
- This could be achieved by holding a public meeting to explain the intentions of developing a Neighbourhood Plan and to recruit community volunteers to join a steering group (see below).

- The town/parish council could also write to local groups and businesses to notify them of their intentions and to identify the level of interest these groups may have in taking part in the Neighbourhood Plan (or maybe sponsoring it).

2.5 The key to keeping the community on board is good publicity and communications at the beginning and throughout the process.

Establishing a Steering Group

2.6 In East Herts, town/parish councils are recognised as qualifying bodies able to produce a Neighbourhood Plan.

2.7 Where a town/parish council decides to start work on a Neighbourhood Plan, they will need to set up a steering group to work with them or alongside them. Where there is a steering group, the town or parish council will be the body responsible for submitting all information to the District Council and at examination.

2.8 Whilst the steering group should include representation from the town/parish council, it is important that wider representation is also sought from the community. Representation could be sought from:

- Residents
- Community groups
- Businesses
- Landowners

The more representative the steering group is, the better the plan is likely to be.

2.9 It will be important for the town/parish council to consider the full range of skills, knowledge and experience it requires to ensure that the team is effective. If the group is too large, it is less likely to be as effective.

- 2.10** How the group is selected is also likely to influence the support that the neighbourhood planning process receives from the community. A selection process that is fair, open and inclusive will ensure a great level of community support.
- 2.11** If the town/parish council is holding a public meeting to explain the intentions of developing a Neighbourhood Plan then this could be an ideal opportunity to recruit members to the steering group.

Defining the Neighbourhood Area

- 2.12** The neighbourhood area is the area to which the proposed Neighbourhood Plan will relate. The expectation in East Herts is that neighbourhood areas will follow parish boundaries. However, a neighbourhood area can cover more than one parish if appropriate.
- 2.13** If the proposed neighbourhood area covers more than one parish, then consent must be sought from each of the affected town/parish councils. This will also have implications for representation on the steering group and the scale of community engagement that the process will require.
- 2.14** A proposal for designating a neighbourhood area must be submitted by the relevant town/parish council to East Herts Council for approval in the early stages of developing the Neighbourhood Plan. When applying for approval, as outlined in the Neighbourhood Planning (England) Regulations 2012, it must include:
- a map outlining the defined area which the Plan refers to;
 - a statement explaining why this area is considered appropriate; and
 - a statement that the organisation or body making the area application is a relevant body for the purposes of section 61G of the 1990 Act.
- 2.15** East Herts Council is responsible for advertising the designation through a 6 week public consultation. Any comments received will be

taken into account when deciding whether to approve or decline the neighbourhood area.

2.16 It is the Council's role to keep an overview of all the different requests to undertake a Neighbourhood Plan in the district. The Council will check that the suggested boundaries for different neighbourhoods make sense and fit together. The Council may say 'no' if, for example, two proposed neighbourhood areas overlap.

Produce a programme for developing the plan

2.17 Before starting to work on the main activity of developing the Neighbourhood Plan, it is recommended that the group produces a programme of what it thinks will need to be done throughout the process.

2.18 In particular it is worth thinking about:

- What needs to be done at each stage – publicity, meetings, surveys, events?
- What resources are needed to carry out these activities – people, funding, materials?
- How much time will be needed to achieve each stage of the programme?

2.19 The programme will help the group to focus and monitor its activity and to think in particular about what funding may be required to develop the plan.

2.20 From recent experience across the country, the process of developing a Neighbourhood Plan takes between 18 – 24 months.

Develop a communications strategy

2.21 In any community led planning exercise, communication and publicity is vital, from an early stage and throughout the process. People are more likely to participate if they are kept informed.

2.22 In the case of developing a Neighbourhood Plan where the support of the community at the referendum stage (see Section 7) is crucial to its adoption, the need to keep information flowing takes on even greater significance.

2.23 The steering group may find it helpful to create an informal 'communications strategy', setting out how and when it means to communicate with the wider community and other stakeholders.

2.24 Different ways of getting messages out to the community include:

- Putting up posters
- Delivering flyers/leaflets
- Talking to neighbours, groups and businesses
- Using IT – town/parish websites, social media, emails
- Putting notices in town/parish newsletters or magazines
- Contacting the local media

Costs

2.25 Plans are likely to vary in costs, depending on the area covered by the plan and the complexity of what is being proposed. Costs will be reduced where local skills and expertise are 'tapped' into.

2.26 Funding from Central Government to support neighbourhood planning has been deferred to an organisation called 'Locality'. Locality is currently helping over 700 groups and has awarded over £4m in grants. The grant programme, available since April 2013, has however proven extremely popular and Locality are currently no longer accepting new expressions of interest for grant. A new support programme is likely to be available from **April 2015**, and it may be possible for areas to submit grant applications just prior to that date. Details of the future support for neighbourhood planning are being worked up by the Department of Communities and Local Government and further details should be made available later in the year. The

latest information can be found here:

<http://locality.org.uk/projects/building-community/>

2.27 A Neighbourhood Plan can consist of various components from the list set out below:

- Strategic Environmental Assessment (where required): £10,000 - £30,000*
- Appropriate Assessment (where required): £15,000*
- Consultation costs: £5,000 - £10,000*
- Examination costs: £5,000 - £8,000*
- Referendum costs: £7,000*

(*costs estimated by the Department for Communities and Local Government in its impact assessment of Neighbourhood Plans and Community Right to Build, January 2011)

2.28 East Herts Council is responsible for covering costs associated with the examination and referendum. All other costs will be the responsibility of the promoters of the Neighbourhood Plan.

3 Sustainability Appraisal, Strategic Environmental Assessment and Appropriate Assessment

3.1 There is no legal requirement to undertake a Sustainability Appraisal on neighbourhood plans. However the Plan must demonstrate how it is contributing to sustainable development, and should include consideration of the possible economic, social and environmental impacts of the emerging plan.

3.2 Neighbourhood Plans may be required to undertake a Strategic Environmental Assessment (SEA) where plans or proposals are likely to have a significant environmental impact. The Plan may require an SEA where:

- the plan allocates sites for development;

- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan;
 - the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the [Local Plan](#).
- 3.3** At the draft stage of the Neighbourhood Plan, its potential environmental impact should be assessed against the criteria set out in Schedule 1 in the [Environmental Assessment of Plans and Programmes Regulations 2004](#). East Herts Council is required to consult the statutory consultation bodies to decide whether the proposals are likely to have significant environmental effects. If an SEA is not deemed to be required, a statement of reasons will be prepared by East Herts Council and can be included in the basic conditions statement for the Examiner.
- 3.4** Where an SEA is deemed to be required, it is East Herts Council's responsibility to ensure that all relevant regulations have been met in order for the Neighbourhood Plan to progress.
- 3.5** The SEA will need to be planned for early on in the process so that emerging ideas, content and policies can be assessed in order to inform the final plan. If the assessments are done too late, it will not be able to inform the final plan (increasing the risk of a legal challenge at a later stage). Throughout the plan it will be useful to review any environmental impacts and to find ways to mitigate any negative impacts if there are any, from the proposed plans.
- 3.6** Appropriate Assessment follows a similar principle but will only be relevant to certain Neighbourhood Plans. Appropriate Assessment specifically considers the wider impacts of particular emerging policies and plans on European sites of ecological importance within the area.
- 3.7** Further guidance on SEA and Appropriate Assessment is available from the Planning Policy Team at East Herts Council.

4 Developing a Vision and Objectives

- 4.1** Developing a vision and objectives with the community will be an important first stage in producing the Neighbourhood Plan.

- 4.2** The vision will be an overarching statement describing what the community will be like in the future.
- 4.3** The objectives will set out what the community wants to achieve in order to help realise the vision. Detailed policies and actions can then follow on from these objectives.

Collecting relevant information

- 4.4** In order to help produce the vision and objectives for the area, it will be necessary for the steering group to get a clear picture of the community's characteristics and understand whether there are any current or emerging proposals that will affect the area.
- 4.5** Community profiling will involve gathering statistical data to help build up a social profile of the community.
- 4.6** It may also be useful to do a stock take of all the area's physical assets and take note of their condition. This might include community centres, village halls, playing fields, sports facilities, footpaths etc.
- 4.7** This could be carried out by the steering group, together with other volunteers, for example by organising a walk. Taking photos of these assets and marking them on the map could help to develop this 'neighbourhood inventory' which could come in useful at later stages in the process.

Reviewing existing plans and strategies

- 4.8** It will also be important to gather information from any existing plans, strategies or studies that have a bearing on the community. These could include:
- East Herts planning documents, including the East Herts Local Plan 2007 and emerging District Plan.
 - Other East Herts strategies and studies, including the East Herts Sustainable Community Strategy 'Everyone Matters'.
 - Previous community-led plans developed in the area, e.g. Town and Parish Plans.
 - Other strategies and studies, including those produced by Hertfordshire County Council.

- 4.9** It is important to try and understand what implications these plans, strategies and studies have for the community. It will be useful for the group to familiarise themselves with the policies within the draft District Plan so as to avoid any duplication when developing their policies. This will ensure the policies are place specific and are tailored to the needs of the area.
- 4.10** The draft District Plan contains policies on Neighbourhood Planning: Policy ‘DPS8 Neighbourhood Planning’ and Policy ‘VILL4 Neighbourhood Plans’. It would be helpful for the steering group to familiarise themselves with the requirements of these policies.
- 4.11** Whilst East Herts is updating the District Plan, it is advised that the emerging Neighbourhood Plans takes into account and works alongside the Planning Policy Team to find pragmatic ways of dealing with particular issues. Further information on the draft District Plan can be found here:

<http://www.eastherts.gov.uk/index.jsp?articleid=15325>.

Discussions with stakeholders

- 4.12** It will also be important for the steering group to establish contacts and have initial discussions with a range of stakeholders, to understand whether there are any other aspirations for the area that have not yet been developed into a plan or strategy.
- 4.13** The group may wish to have discussions with the following:
- Local community groups
 - Local businesses
 - Local landowners and/or their representatives
 - Officers at East Herts Council
 - Officers at Hertfordshire County Council
 - Representatives from other organisations, e.g. Environment Agency, English Heritage, Natural England

Identify the area’s strengths and weaknesses

- 4.14** Another important factor in developing the vision and objectives is to find out what people consider to be the community’s current strengths and weaknesses.

4.15 This will involve engaging with residents, community groups and local businesses. This could be done using the following methods:

- Survey (hard copy or web based)
- Community events (workshops or exhibitions)
- Focus group or discussion at meeting of local group
- Other methods tailored for different sectors of the community

4.16 Possible questions that could be asked by the steering group include:

- What are our strengths as a community?
- What do we do well?
- What can we improve or change in the community?
- What are we missing?
- What do we need to do to make the community a better place to live?
- What resources do we have? (people, services, land)
- What opportunities exist in the area?
- What are the barriers? (environmental, physical, financial)

Draft the vision and objectives

4.17 As the Neighbourhood Plan will ultimately form part of the District Plan for the District (assuming it passes the examination and referendum), it would make sense for the vision to cover the same time period as that of the emerging District Plan, which runs up until 2031.

4.18 The steering group could draft a series of vision statements, setting what it will be like to live and work in the area in 2031, or there could be one vision statement. However it is important that the vision is realistic and achievable.

4.19 A typical Neighbourhood Plan vision statement might include topics such as:

- What the area will look like
- What facilities there will be (e.g. parks, shops, schools)
- What the social and economic outlook for the area will be

4.20 The objectives will be more specific and will set out how the vision will be achieved. For each element of the vision, there may be one or a number of objectives, depending on the different priorities of the community.

4.21 The steering group may find that some of the feedback it receives from the community doesn't really relate to Neighbourhood Planning, e.g. concerns over litter.

4.22 Whilst this may not be a subject for the Neighbourhood Plan, it will still be an important issue for the community, and will therefore need to be dealt with via an alternative route. The town or parish council may wish to develop a separate action plan to deal with these wider issues.

Check for conformity with strategic policies in the development plan

4.23 Once the steering group has drafted a vision and objectives, it will be important to check that they don't stray too far from or offer a contrary position to the development plan for the area.

Check the draft vision and objectives with the community

4.24 It is essential to check that the community supports and has an input in at each stage of the Neighbourhood Plan. There are a number of ways in which this endorsement can be sought, including:

- Deliver copies to all households and ask for feedback
- Meet with community groups and ask for feedback
- Hold a public meeting or drop-in event
- Publish information in the parish newsletter/magazine and ask for feedback

4.25 Any necessary amendments can be made before moving on to developing the detailed content of the Neighbourhood Plan.

5 Developing the Plan

- 5.1** Once the vision and objectives have been drafted and agreed, the steering group can start to think about the detailed content of the Neighbourhood Plan.
- 5.2** The detailed content will include policies, a proposals map and possibly an implementation plan for the area.

Policies

- 5.3** The intention of Neighbourhood Plans should be to set out policies on the development and use of land in a neighbourhood area.
- 5.4** In this respect, a Neighbourhood Plan is similar to the 'Local Plan' for the district, but it is written and applied at the parish level.
- 5.5** The draft policies that are included within the Neighbourhood Plan should be based on the information gathered during previous stages of evidence gathering and community and stakeholder engagement. Policies should ultimately seek to achieve the vision and objectives.
- 5.6** For each objective that has been agreed, the steering group should consider what policies could be put in place to try and achieve them.
- 5.7** Policies may take one or more of the following forms:
- Policies may identify or allocate sites for particular types and scales of development (e.g. residential, employment etc)
 - Policies may specify particular requirements relating to each allocation (e.g. landscaping)
 - Policies may identify sites within the neighbourhood area to be protected or enhanced
 - Policies may be more generic and apply to any future development within the neighbourhood area (e.g. local design policies)

- 5.8** The need to ensure that policies are achievable applies particularly to those that relate to the future use of a particular site within the neighbourhood area. The steering group should ensure that site related policies have been drawn up in negotiation with the relevant landowners or site promoters.
- 5.9** When developing the neighbourhood plan policies it will be vital to ensure they do not stray too far from or offer a contrary position to the strategic policies in the development plan for the area. It will be useful to bear this in mind whilst developing them to make sure the policies will not need modification at a later stage.
- 5.10** ‘Locality’ has recently produced a helpful guide on writing planning policies. The guidance contains real plan examples and worksheets. See more at: <http://mycommunityrights.org.uk/blog/guide-writing-planning-policies-neighbourhood-plans-released/>

Maps and Illustrations

- 5.11** Neighbourhood Plans are encouraged to use images and maps to illustrate policies or supportive text, and to provide context. For example, a policy on design may be enhanced by images of examples of what the Neighbourhood Plan considers to be of a good design.
- 5.12** For site allocations and site related policies, the Neighbourhood Plan will need to include a map showing proposed site locations and boundaries.
- 5.13** The steering group may find it useful to produce these maps as it starts to draft the Neighbourhood Plan policies. Showing proposed locations on maps will help in any communication with the wider community and can assist in getting their views on particular sites.
- 5.14** Town and parish councils may already have Ordnance Survey licenses so will be able to produce maps of their area (assuming they have access to GIS). For those town and parish councils that don’t currently have an Ordnance Survey license, then they can sign up to

a Public Sector Mapping Agreement from Ordnance Survey, which will allow them to produce maps free of charge. (<http://www.ordnancesurvey.co.uk/oswebsite/public-sector/mapping-agreement/index.html>)

Develop an Implementation Plan

- 5.15** The steering group may wish to draw up an implementation plan, showing what actions are required ‘on the ground’ in order to achieve the vision and objectives of the Neighbourhood Plan. This does not need to be part of the main Neighbourhood Plan itself, but could form an appendix to the main document, which can continue to evolve as actions progress and new ones are agreed.
- 5.16** When developing the actions, the steering group may wish to consider the following principles:
- Priority: Is the action a high, medium or low priority?
 - Responsibility: Which organisation is the lead for delivering this action
 - Timescale: By what date should the action be carried out?
 - Partners: Does the action require support from partners?
 - Resources: Is funding or any other resource required?
- 5.17** Certain actions may require input and assistance from a variety of stakeholders e.g. East Herts Council, Hertfordshire County Council, landowners, service providers, as well as groups from within the community.

Finalise the draft of the Neighbourhood Plan

- 5.18** Once the policies and the implementation plan have been drafted, then the steering group can start to produce the Neighbourhood Plan.
- 5.19** There is no rule about what a Neighbourhood Plan should look like, as long as it contains clear policy statements with accompanying

maps. There are examples [available online](#) which may be useful to view.

5.20 Any associated implementation plan could be an appendix to the Neighbourhood Plan.

5.21 At this stage, the steering group will also need to screen policies against the Strategic Environment Assessment criteria (and Appropriate Assessment if necessary), explaining why the policies included in the plan are the most appropriate ones.

Check for conformity with strategic policies in the development plan

5.22 It is again advisable, at this stage, for the steering group to check their emerging policies and actions to ensure they are in conformity with the strategic policies in the Local Plan and emerging District Plan. Hopefully, if there has been continued liaison with the Planning Policy Team at East Herts Council, then there shouldn't be an issue with lack of conformity.

Public Consultation

5.23 Prior to submitting the final version of the Neighbourhood Plan to East Herts Council, the steering group are required to undertake a six week public consultation, referred to as the Regulation 14 consultation within the 2012 Regulations. If an SEA and/or Appropriate Assessment is required then this report should also be made available for comment.

5.24 As well as getting the views of residents and local groups, the steering group should consult any of the consultation bodies whose interests it considers may be affected by the draft plan or order proposal as outlined in Paragraph 1 of Schedule 1 in the [The Neighbourhood Planning \(General\) Regulations 2012](#). The parish or town Council must publicise in a manner that will raise attention to the consultation outlining:

- the details of the proposals of the plan;
- how to make representations; and
- the date by which those representations must be received.

5.25 Once this consultation has been carried out, an analysis of comments should be made and the steering group should consider whether any amendments need to be made to the draft plan before it is submitted to East Herts Council. It may be useful to log all received comments together with any steering group responses to identify if any changes/amendments are necessary to the draft plan.

6 Independent Examination

Submit Neighbourhood Plan to East Herts Council

- 6.1** Once the steering group has made any necessary amendments to the Neighbourhood Plan, it should submit the Plan to East Herts Council.
- 6.2** When submitting the Plan, the steering group must also prepare and submit to East Herts Council:
- a map or statement which identifies the area of the Neighbourhood Plan;
 - a consultation statement; and
 - a 'basic conditions' statement.
- 6.3** The Consultation Statement must outline who and how the community was consulted about the proposed Neighbourhood Plan, with a summary of the main issues and concerns and whether the Neighbourhood Plan has addressed any of them.
- 6.4** The Basic Conditions statement must outline how the Plan is in general conformity with the NPPF, the strategic Local Plan policies and how the making of the Plan is in conformity with EU obligations.

- 6.5** If an SEA is not required, the reasons for this may be included in the Basic Conditions statement. If an SEA has been prepared, it must be submitted along with the Neighbourhood Plan.

Publicising Plan Proposals

- 6.6** If the District Council agrees that the Neighbourhood Plan meets the above mentioned requirements, it will publicise the final version of the plan through a 6 week public consultation (referred to as the Regulation 15 consultation within the 2012 Regulations). All Consultation bodies listed in Paragraph 1 of Schedule 1 in the [The Neighbourhood Planning \(General\) Regulations 2012](#) will be consulted.
- 6.7** All comments received during this consultation will be sent to the Examiner, once appointed.

Appointment of Examiner and Examination

- 6.8** East Herts Council will start the process of appointing an examiner once the public consultation has started. East Herts Council in collaboration with the steering group will decide on whom to appoint to undertake an independent examination of the Neighbourhood Plan.
- 6.9** The main function of the examination will be to check that the Neighbourhood Plan conforms with:
- The strategic policies in the development plan
 - The National Planning Policy Framework (NPPF)
 - Relevant European Directives
 - Neighbouring Neighbourhood Plans
- 6.10** East Herts Council will organise all material to be sent to the Examiner. It is anticipated that the examiner will consider written representations during the examination period, rather than oral representations. If the examiner does decide that an oral

representation is preferable, then a public hearing must be held and organised by East Herts Council.

Examiner's Report

- 6.11** The result of the examination will be a report that will have one of the following recommendations:
- The draft Neighbourhood Plan should proceed to a referendum;
 - The draft Neighbourhood Plan should proceed to a referendum, subject to certain amendments;
 - The draft Neighbourhood Plan should be refused.
- 6.12** The report will be issued to both the town/parish council and East Herts Council.
- 6.13** Where the examination shows that the Neighbourhood Plan is not compliant with the strategic policies in the development plan, legal requirements or national policy, then East Herts Council will not be obliged to carry out a referendum or adopt the plan.
- 6.14** Following the examiner's report, it is East Herts Council's responsibility to decide whether the Plan should proceed to Referendum. Following the Examiner's report, East Herts Council are entitled to decide any of the following:
- to decline to consider a plan proposal;
 - to refuse a plan proposal;
 - what action to take in response to the examiner's recommendations;
 - what modifications should be made to the plan;
 - whether to extend the area to which the referendum is to take place.
- 6.15** Once a decision has been made, East Herts Council must publish:

- the decision and reasons for it;
- details of where and when the decision may be inspected; and
- the examiner's report.

6.16 If the District Council agrees the Neighbourhood Plan should go to Referendum, the District Council must publish the Plan and identify where it can be inspected and notify anyone who asked to be notified.

7 Referendum

7.1 If the District Council recommends that the draft Neighbourhood Plan should proceed to a local referendum, then East Herts Council will arrange and co-ordinate this.

7.2 A referendum is required to gauge community support for the Neighbourhood Plan. Where the plan receives the support of more than 50% of voters at the referendum, then the plan will be adopted by East Herts Council and brought into effect.

8 Adoption

8.1 East Herts Council will adopt the Neighbourhood Plan as soon as reasonably practicable, bearing in mind the normal democratic process.

8.2 Once the Neighbourhood Plan has been adopted, it will become part of the statutory development plan against which relevant planning applications will be determined.

9 Implementing and Monitoring the Plan

9.1 It is recommended that the town/parish council continues to monitor the Neighbourhood Plan and associated implementation plan, to

check that progress is being made against the community's objectives.

9.2 It is anticipated that Neighbourhood Plans will align with the emerging District Plan and that they will cover the period to 2031. This does not mean that the town/parish council cannot refresh its Neighbourhood Plan if the need arises before that time. It should be noted, however, that the process for a refresh will include further consultation, an examination and referendum.

10 Support

10.1 'Locality' offers a wide range of support, including:

- Direct Support packages for groups at the very beginning of the process, those close to pre-submission consultation, and for those preparing to submit their Neighbourhood Plans (<http://mycommunityrights.org.uk/neighbourhood-planning/>).
- The advice service provided by Locality offers free telephone advice on 0300 020 1864, Mon-Fri 9.30am – 12.30pm.
- Planning Aid England offers free, general planning advice by phone and email, and online (<http://www.rtpi.org.uk/planningaid/>).

10.2 The following websites also provide a range of tools and case studies, including examples of innovative ways of raising funding, Shared Learning activities, and online bulletins:

- Neighbourhood Planning Community Knowledge Hub: <http://planning.communityknowledgehub.org.uk/>
- Planning Aid England's Forum for Neighbourhood Planning: <http://www.ourneighbourhoodplanning.org.uk/>
- Planning Guidance from DCLG:

<http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/>

- The Prince's Foundation for the Built Environment:
<http://www.princes-foundation.org/our-work/supporting-communities-and-neighbourhoods-planning>
- CPRE in partnership with NALC: <http://www.planninghelp.org.uk>,
www.cpre.org.uk, www.nalc.gov.uk

EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL - 22 OCTOBER 2014
EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING
AND TRANSPORT

GREATER ESSEX DEMOGRAPHIC FORECASTS 2012-2037
PHASE 6 MAIN REPORT - SEPTEMBER 2014

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report sets out the findings of the Greater Essex Demographic Forecasts 2012-2037 Phase 6 Main Report technical work, which is intended to form part of the evidence base for generating an appropriate district-wide housing target for the period 2011 to 2031, and inform and support the East Herts District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE</u> <u>PANEL AND EXECUTIVE: That:</u>	
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(A)	The Greater Essex Demographic Forecasts 2012 -2037 Phase 6 technical study, be supported as part of the evidence base to inform and support the East Herts District Plan.
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<u>RECOMMENDATIONS FOR COUNCIL: That:</u>	
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(A)	The Greater Essex Demographic Forecasts 2012 -2037 Phase 6 technical study, be agreed as part of the evidence base to inform and support the East Herts District Plan.
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1.0 Background

- 1.1 East Herts Council is responsible for setting a district-wide housing target, based on objectively assessed needs for market and affordable housing.

- 1.2 Paragraph 47 of the National Planning Policy Framework (NPPF) states that '*local planning authorities should use their evidence base to ensure that their local plan meets the full objectively assessed needs for market and affordable housing...as far as is consistent with the policies set out in this framework...* In addition, Paragraph 159 of the NPPF states that local planning authorities should '*meet household and population projections, taking account of migration and demographic change [...and cater...] for housing demand and the scale of housing supply necessary to meet this demand*'.
- 1.3 In July 2011, East Herts Council joined with the Greater Essex Grouping of local authorities to commission Edge Analytics Ltd to undertake technical work, in respect of population and household forecasting, to provide robust evidence to support setting its own district-wide housing target. This work is being undertaken in stages under the auspices of the Essex Planning Officers Association (EPOA). The preliminary results formed the basis of the Population and Household Topic Paper presented to the LDF Executive Panel on 29 March 2012.
- 1.4 The Greater Essex Demographic Forecasts Phases 1 to 4 (March 2012 - January 2013) were presented to the District Planning Executive Panel on 21 February 2013, and subsequently agreed as part of the District Plan evidence base by the Executive and Full Council on 5 and 6 March 2013 respectively.
- 1.5 The Greater Essex Demographic Forecasts Phase 5 Main Report (April 2014) was presented to the District Planning Executive Panel on 17 July 2014, and subsequently agreed as part of the District Plan evidence base by the Executive and Full Council on 5 August and 1 October 2014 respectively.
- 1.6 In addition to the strategic demographic work, the Council engaged the same consultants, Edge Analytics Ltd, to undertake sub-district population and household forecasts, in order to provide benchmarking demographic information, to inform the preparation of the East Herts District Plan.
- 1.7 The Sub District Population and Household Forecasts were presented to the District Planning Executive Panel on 28 November 2012, and subsequently agreed as part of the District Plan evidence base, by the Executive and Full Council on 4 and 12 December 2012 respectively.

- 1.8 This report presents the findings of Phase 6 which incorporates updated 'official' statistics from the Office for National Statistics (ONS). This new evidence includes key assumptions from the 2012-based national population projection, plus area-specific data on fertility, mortality and migration which drive the 25-year, 2012 based sub-national population projections (SNPP).
- 1.9 In addition, all scenarios in Phase 6 have been formulated using an upgrade to the POPGROUP forecasting software which incorporates important methodological changes, specifically to align more closely with ONS methods.
- 1.10 It is proposed that Phase 6 be agreed as part of the evidence base to inform and support the East Herts District Plan. All the Greater Essex and East Herts Sub-District studies are available on the Council's website - see Background Papers.

2.0 Report

Greater Essex Demographic Forecasts 2012-2037 Phase 6 Main Report

- 2.1 The Greater Essex Demographic Forecasts Phase 6 Main Report is structured as follows:
- **Section 1: Introduction** - provides a context for the project and summarises the content of the Main Report September 2014. Most of this Introduction is reproduced as **Essential Reference Paper 'B'** to this report.
 - **Section 2: Population Estimates & Projections** - provides an introduction to the 2012-based population projections, their national context and the growth trend evident across the study area.
 - **Section 3: London's demographic influence** – illustrates the continuing influence of Greater London upon growth in the study area and summarises the most recent forecasts produced by the Greater London Authority (GLA) in its own evidence to support housing growth in the London Boroughs.
 - **Section 4: Scenario Definition** – provides a description of each of the scenarios that have been formulated using the POPGROUP software. POPGROUP is a family of demographic models that enables forecasts to be derived for population, households and the labour force, for areas and social groups.

- **Section 5: Area profiles** - summarises the outcome of each of these scenarios, presenting growth in terms of population, households, dwellings, labour force and jobs impacts for each of the study local authorities. The East Herts Area profile is reproduced at **Essential Reference Paper ‘C’ to this report**.
- **Section 5: Summary Comments** - provides a short summary of the analysis and an indication of the likely content of the Phase 7 analysis.
- **The Appendix** to the Main Report contains guidance on the data inputs and assumptions used in the development of the scenarios.
- An accompanying report provides scenario summaries for each of the 11 Macro Areas within the overall study, which are varying groupings of more than one local authority.

2.2 A summary of the Phase 6 Main Report is contained at **Essential Reference Paper ‘D’** to this report.

2.3 The Report considers ten alternative growth scenarios for the District as follows:

SNPP-2012	Where the 2012-based sub-national population projection from ONS is used as the trend benchmark
SNPP-2010	Where the 2010-based sub-national population projection from ONS is used as the trend benchmark
PG-5yr	Where internal and international projection assumptions are based on five years of historical evidence (2007/8 - 2011/12)
PG-5yr-X	Where internal and international migration assumptions are based on the last five years of historical evidence, ignoring the Unattributable Population Change (UPC)
PG-10yr	Where internal and international projection assumptions are based on 10 years of historical evidence (2002/3 - 2011/12)
PG-10yr-X	Where internal and international migration assumptions are based on the last 10 years of historical evidence, ignoring the UPC
Net Nil	Where migration assumptions are maintained but in-migration, as well as immigration and emigration, are set to balance each other, i.e. the net impact of

	migration is zero
Natural Change	Where in-migration, out-migration, immigration and emigration projection assumptions are each set to zero, with only births and deaths determining growth
Jobs*	Where demographic change is constrained to the growth in total employment
Employed people*	Where demographic change is constrained to the growth in the number of workplace employed people

* The revised 2013 'Baseline' scenario from East of England Forecasting Model (EEFM) has provided the latest employment growth forecasts for EPOA local authorities.

- 2.4 The East Herts Area profile at **Essential Reference Paper 'C'** summarises the new demographic evidence and sets out the implications of the various growth scenarios.
- 2.5 The 2012- based SNPP projection estimates that the population of East Herts will increase by 24% (approximately 33,500) over the 25-year period 2012-37. This equates to an average population growth of 0.96% per year, higher than that experienced in the latest 10-year historical period (0.73% per year) or the latest 5-year historical period (0.90% per year).
- 2.6 The components of this population change are summarised in the table below:

Component of Change	2012-based SNPP annual average (2012/13-2036/37)
Natural change	526
Net Internal Migration	642
Net International Migration	171
Annual Population Change	1,339
Annual Population Change (%)	0.96%

- 2.7 Over the 25 year period, internal migration will become the dominant component of population change in East Herts. However, both natural change and international migration will also continue to have a positive net impact on population growth
- 2.8 Each scenario has been evaluated using both 2011-based (Option A) and 2008-based (Option B) household headship rates,

providing a 'range' of household and dwelling growth options for consideration.

- 2.9 The application of the 2008-based household formation rates (Option B) results in a dwelling requirement that is approximately 11% higher than that associated with the application of the 2011-based household formation rates (Option A). This calculation excludes the 'Nil Net' and 'Natural Change' scenarios, as for local planning purposes, the NPPF requires local planning authorities to take *'account of migration and demographic change [...and cater...]' for housing demand and the scale of housing supply necessary to meet this demand'*.
- 2.10 In summary, the highest dwelling requirements result from the employment led scenarios, followed by the official demographic projections and then the migration led scenarios.
- 2.11 Considering the average of the 2011-based Option A and 2008-based Option B alternatives, suggests a dwelling requirement of 891-964 per year resulting from the East of England Forecasting Model (EEFM) scenarios (jobs and employed people). The official demographic projections (SNPP-2010 and SNPP-2012) suggest growth at 755 and 754 dwellings per year respectively. The four 'migration-led' scenarios (PG-10yr, PG-10yr-X, PG-5yr and PG-5yr-X) record a range of outcomes that are lower than the employment led and official scenarios, at 526-614 dwellings per year.
- 2.12 If the eight scenarios (excluding 'Net Nil' and 'Natural Change') are averaged to 'even out' the outcomes to take account of the different scenario approaches, origins and bases, the annual average dwelling requirements are as set out in the table below:

Option A (2011-based)	Option B (2008-based)	Options A and B Average 2011 and 2008-based
669	743	706

Establishing Objectively Assessed Need

- 2.13 Members will be aware that the draft District Plan identified a housing requirement of 750 dwellings per annum. This figure had been derived primarily from the DCLG 2011-based household projections. Acknowledging that the projections only covered the

period from 2011-2021, a calculation was made by officers regarding the likely increase in households from 2021-2031. This calculation concluded that the overall housing need was 736 dwellings per annum, which was rounded up to 750 dwellings per annum to reflect positive plan making.

2.14 Following the publication of the draft District Plan for consultation, DCLG published 'National Planning Practice Guidance' (NPPG) in March 2014 which sets out a 'standard methodology' that local planning authorities are expected to follow to establish the need for housing (and economic) development. Some of the key considerations are:

- Assessments should be 'policy-off', so free from considerations which may be a constraint, eg. the supply of land.
- No one methodology will provide a definitive answer but the latest official household projections produced by the Government (and population projections produced by the Office for National Statistics) are the starting point in establishing need.
- Adjustments **may** be made to the official household projection-based estimates of need based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Any local changes should be justified by a robust evidence base.
- Adjustments **should** be made to the official household projection-based estimates of need to reflect:
 - 'market signals'; market indicators of the balance between the demand for and the supply of housing, eg. increasing house prices and worsening affordability.
 - delivery of the required number of affordable homes.
 - the alignment of housing and jobs targets.

2.15 The NPPG states that this assessment should be included within the Strategic Housing Market Assessment (SHMA). Members will be aware that the Council's latest SHMA was published in March 2013, prior to the publication of the NPPG. That SHMA is therefore now considered to be an 'old style SHMA', prepared in accordance with the guidance set out under the old planning system.

Strategic Housing Market Assessment

- 2.16 The Council has recently commissioned ORS to carry out a Strategic Housing Market Assessment that conforms to the latest guidance set out in the NPPG. The assessment is being carried out with the adjoining local authorities of Uttlesford, Harlow and Epping Forest with whom East Herts shares a housing market relationship.
- 2.17 The key output of the SHMA will be the modelling of the objectively assessed need (OAN) for housing at both the Housing Market Area (HMA) level and disaggregated to each local authority level. The OAN may be a single figure, or it may be a minimum-maximum range. The demographic forecasts produced by Edge Analytics to date will provide the basis for further demographic analysis to ensure that the assumptions being made regarding population and households are accurate inputs for the modelling of OAN.
- 2.18 The NPPF and NPPG make it clear that an authority's OAN does not necessarily equal the housing provision target in its Plan. Two additional factors need to be considered when establishing the housing target. The first is the area's deliverable and sustainable supply capacity, defined with reference to constraints recognised in the NPPF. The second factor is the requirement to consider cross-boundary unmet need, which the area should accept if it is possible, sustainable and reasonable. These are factors which the Council will need to consider through on-going work on 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

National Planning Policy Framework (NPPF): March 2012: Department for Communities and Local Government.

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

National Planning Practice Guidance (NPPG): March 2014: Department for Communities and Local Government

<http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/>

Report to LDF Panel 29 March 2012 Agenda item 7: Population and Household Forecasts and the East Herts Housing Requirement

Greater Essex Demographic Forecasts-Phase 2: Scenario Development incorporating Phase 1: Model Development (March 2012) Edge Analytics on behalf of Essex Planning Officers Association (EPOA) and East Herts and Welwyn Hatfield Council

Greater Essex Demographic Forecasts- Phase 3: Further Scenario Development (July 2012) Edge Analytics on behalf of Essex Planning Officers Association (EPOA) and East Herts and Welwyn Hatfield Council

Report to District Planning Executive Panel-26 July 2012 Agenda Item 5: Sub-District Population and household Forecasts-Parish Groupings and Towns: Phase 1 (May 2012)

Report to District Planning Executive Panel - 28 November 2012 Agenda Item 5: Sub-District Population and Household Forecasts-Parish Groupings and Towns: Phases 1 and 2 (October 2012)

Greater Essex Demographic Forecasts- Phase 4: Demographic Model Update, Scenario Analysis and Report Edge Analytics on behalf of Essex Planning Officers Association (EPOA) and East Herts and Welwyn Hatfield

Greater Essex Demographic Forecasts 2012-2037 Phase 5 April 2014

Greater Essex Demographic Forecasts 2012-2037 Phase 6 September 2014

Links to all the reports listed above can be found at:
<http://www.eastherts.gov.uk/index.jsp?articleid=25754>

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>People – Fair and accessible services for those that use them and opportunities for everyone to contribute</p> <p>This priority focuses on delivering strong services and seeking to enhance the quality of life, health and wellbeing, particularly for those who are vulnerable.</p> <p>Place – Safe and Clean</p> <p>This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p>Prosperity – Improving the economic and social opportunities available to our communities</p> <p>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:	District Plan technical work is from the Planning Policy Upkeep Budgets
Human Resource:	Existing Planning policy staff resources are being used to manage this study.
Risk Management:	In order to be found sound at examination, it is essential that the District Plan should be based on a robust evidence base, of which the Demographic Forecasts work forms a key part.
Health and wellbeing – issues and impacts:	N/A

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Greater Essex

Demographic Forecasts 2012-2037

Phase 6 Main Report

September 2014

edge analytics
www.edgeanalytics.co.uk

1. Introduction

Context

- 1.1 With the revocation of the Regional Spatial Strategy (RSS), the development of housing requirements for Local Plans is now very much the responsibility of individual local authorities. The National Planning Policy Framework (NPPF)¹ and Planning Practice Guidance (PPG)² provide guidance on the appropriate approach to the objective assessment of housing need and the use of demographic and economic evidence to support this assessment. As a result, the development and presentation of demographic evidence to support local housing plans is subject to an increasing degree of public scrutiny.
- 1.2 The Essex Planning Officers Association (EPOA) has maintained its commitment for continued collaboration between authorities in the preparation and use of demographic information to support Local Plan development. EPOA views the availability of robust and consistent demographic information and forecasts across a wide area as a vital component in any local planning authority evidence base; facilitating more informed discussion regarding future development with local communities, neighbouring authorities, infrastructure and service providers, developers and others. In particular, demographic data is a key component to inform and mobilise the 'duty to cooperate' which the Localism Act places on authorities, their neighbours and other organisations when engaged in policy development and Local Plan preparation.
- 1.3 During 2010-12, EPOA commissioned an initial programme of work which delivered a range of demographic forecasts for its member authorities, providing a suite of scenarios from which future growth trajectories might be evaluated. This project was conducted in four phases and concluded in summer 2012.
- 1.4 EPOA has now extended this commission to provide an annual update to the demographic forecasting evidence for its member authorities. This new evidence continues to include a variety of forecasts, including official projections, alternative trend scenarios and economic-led growth outcomes.

¹ <http://planningguidance.planningportal.gov.uk/blog/policy/>

² <http://planningguidance.planningportal.gov.uk/blog/guidance/>

Work programme

1.5 The new commission has been organised into three phases, continuing from the original programme of work, as follows:

1.6 **Phase 5: December 2013 – February 2014**

This phase included an update to the previous EPOA demographic forecasts and evidence to take account of: 2011 Census statistics; revisions to mid-year population estimates for 2002-10; the new 2011-based household projections; 2012 mid-year estimates; and the latest forecasts of economic growth.

1.7 **Phase 6: June 2014 – July 2014**

This latest phase incorporates updated 'official' statistics from the Office for National Statistics (ONS). This new evidence includes key assumptions from the 2012-based *national* population projection, plus area-specific data on fertility, mortality and migration which drive the 25-year, 2012-based sub-national population projections (SNPP). This new evidence is presented alongside revised jobs-led scenarios and the previous 2010-based SNPP.

All scenarios in Phase 6 have been formulated using POPGROUP 'version 4' technology, a 2014 upgrade to the forecasting software which incorporates important methodological changes, specifically to align more closely with ONS methods.

1.8 **Phase 7: quarter 1 2015**

A final phase of work will include updates to take account of new household projections (scheduled for release in quarter 4 2014), the latest mid-year population estimates and the latest forecasts of economic growth.

1.9 This document provides a summary of the Phase 6 analysis and forecasts.

Forecasting methodology

1.10 Demographic forecasts have been developed using the POPGROUP suite of products. POPGROUP is a family of demographic models that enables forecasts to be derived for population, households and the labour force, for areas and social groups. The main POPGROUP model (Figure 1) is a cohort component model, which enables the development of population forecasts based on births, deaths and migration inputs and assumptions.

- 1.11 The Derived Forecast (DF) model (Figure 2) sits alongside the population model, providing a headship rate model for household forecasting and an economic activity rate model for labour-force forecasts.
- 1.12 The scenarios presented in the Phase 6 EPOA report have been developed using the latest version (version 4) of the POPGROUP demographic forecasting software. This new release of the software includes a number of enhancements but, most significantly, has made changes to the way in which 'internal' migration flows are handled within the model.
- 1.13 These changes have involved linking internal 'in-migration' rates directly to an external reference population (in this case the UK population) rather than to the population of the area itself. The internal 'out-migration' methodology is unchanged.
- 1.14 This has had the effect of changing the future impact of migration, with the level of internal in-migration changing in relation to growth in the reference population and the level of internal out-migration changing in relation to the growth of the population of each local area. This provides a more appropriate balance between in and out flows to and from an area.
- 1.15 These methodological changes have ensured that the POPGROUP version 4 approach is more consistent with the ONS population model and produces more robust alternative trend scenarios using the available evidence.
- 1.16 For detail on the POPGROUP methodology, please refer to the POPGROUP v.4 user manual, which can be found at the POPGROUP website: <http://www.ccsr.ac.uk/popgroup/index.html>

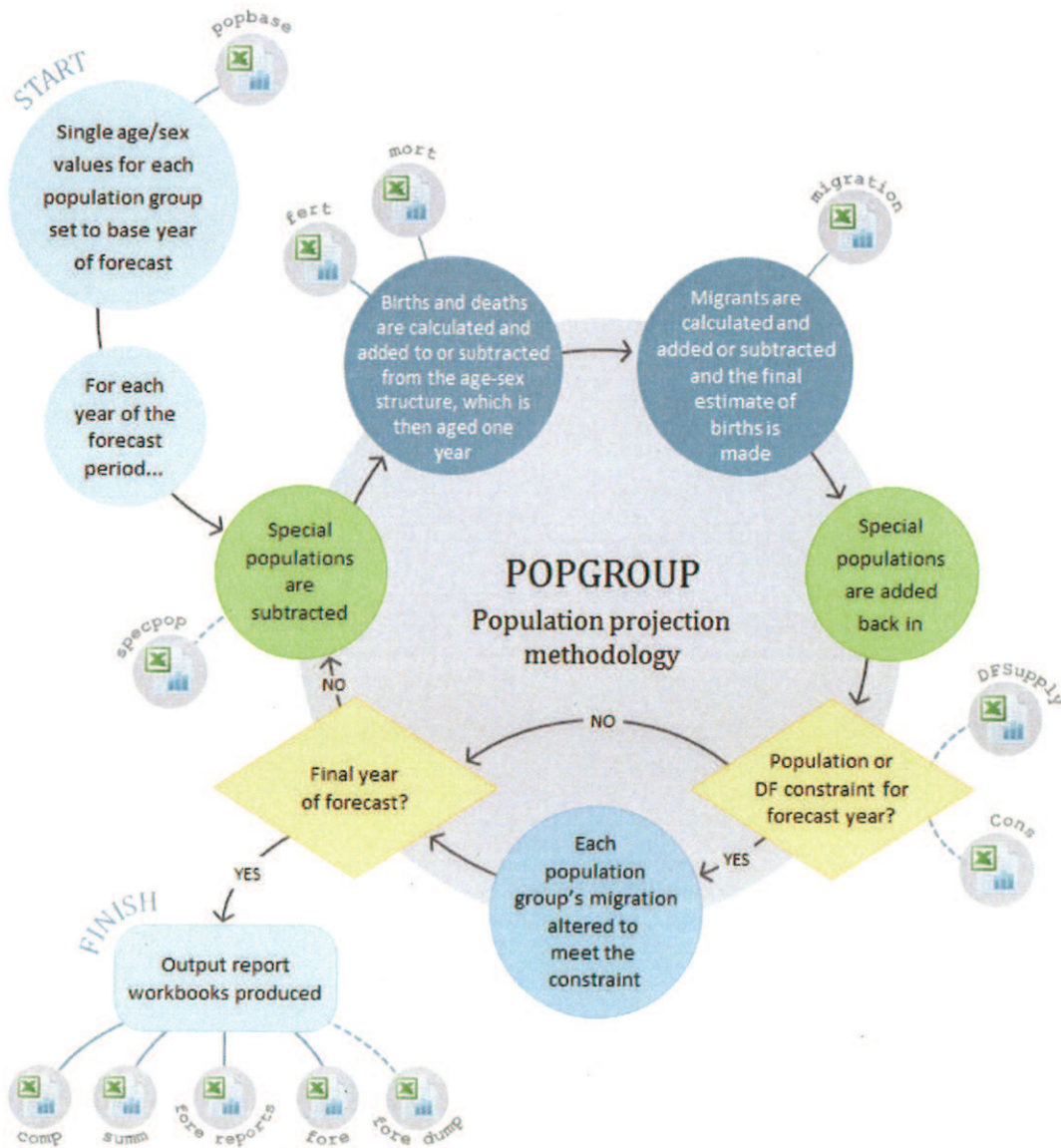
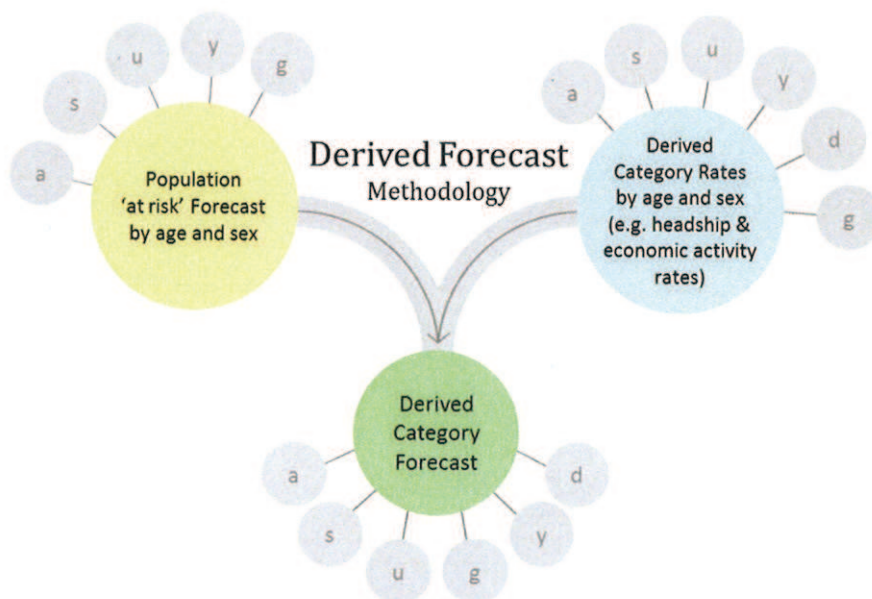


Figure 1: POPGROUP population projection methodology



$$D_{a,s,u,y,d,g} = \frac{P_{a,s,u,y,g} R_{a,s,u,y,d,g}}{100}$$

- D* Derived Category Forecast
- P* Population 'at risk' Forecast
- R* Derived Category Rates
- a* Age-group
- s* Sex
- u* Sub-population
- y* Year
- d* Derived category
- g* Group (usually an area, but can be an ethnic group or social group)

Figure 2: Derived Forecast (DF) methodology

EPOA geography

- 1.17 The EPOA geographical area of interest encompasses a total of 24 local authority districts and unitary authorities plus a number of 'macro' areas, created as aggregates of these (Figure 3). Analysis, forecasting and reporting have been undertaken for each of these defined geographical areas.

Districts & Unitary Authorities				
ID	ONS old Area Code	ONS new Area Code	Area	Short label
1	22UB	E07000066	Basildon	BAS
2	22UC	E07000067	Braintree	BTE
3	22UD	E07000068	Brentwood	BRW
4	22UE	E07000069	Castle Point	CPT
5	22UF	E07000070	Chelmsford	CHL
6	22UG	E07000071	Colchester	COL
7	22UH	E07000072	Epping Forest	EPF
8	22UJ	E07000073	Harlow	HLW
9	22UK	E07000074	Maldon	MAL
10	22UL	E07000075	Rochford	ROC
11	22UN	E07000076	Tendring	TEN
12	22UQ	E07000077	Uttlesford	UTT
13	00KF	E06000033	Southend-on-Sea	SOS
14	00KG	E06000034	Thurrock	THU
15	12UB	E07000008	Cambridge	CamCity
16	12UG	E07000012	South Cambridgeshire	SCambs
17	26UB	E07000095	Broxbourne	Brox
18	26UD	E07000097	East Hertfordshire	EHerts
19	26UL	E07000241	Welwyn Hatfield	Wel Hat
20	42UB	E07000200	Babergh	Babergh
21	42UD	E07000202	Ipswich	Ipswich
22	42UE	E07000203	Mid Suffolk	MidSuff
23	42UG	E07000205	Suffolk Coastal	SufCoast
24	42UF	E07000204	St. Edmundsbury	StEdmun
Macro Areas				
ID	Definition	Area	Short label	
25	1-12	Essex CC	EssexCC	
26	1-14	Greater Essex	GtrEssex	
27	1, 4, 10, 13, 14	Essex Thames Gateway	EsxTham	
28	3, 5, 9	Heart of Essex	HrtEssex	
29	2, 6, 9, 11	Essex Haven Gateway	EssexHG	
30	20-23	Suffolk Haven Gateway	SufflkHG	
31	2, 6, 9, 11, 20-23	Haven Gateway	HG	
32	7, 8, 12	West Essex	Wessex	
33	17, 18	Hertfordshire (East)	EastHert	
34	7, 8, 12, 17, 18	Stansted/M11 Corridor	StansM11	
35	7, 8, 18	Harlow Joint Working Area	Harlow	

Figure 3: EPOA study area definition

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5. Area Profiles

Guidelines

- 5.1 For each of the EPOA local authorities, the new demographic evidence is summarised: first with an illustration of the 'components of change' which have shaped historical population growth over the last 5 and 10 years, compared with those that have been estimated as the drivers of change in the ONS 2012-based SNPP; and secondly with a table of dwelling growth outcomes from the suite of scenarios that has been evaluated.
- 5.2 A more detailed summary of the results of each scenario forecast is provided in the form of a chart and accompanying tables of statistics. The chart illustrates the trajectory of population change resulting from each scenario. The tables summarise the change in population and household numbers from 2012-2037 that result from each scenario.
- 5.3 The scenarios are ranked according to the estimated level of population change over the forecast period. Each table illustrates the average annual net migration associated with the population change, plus the expected average annual dwelling and jobs growth based on the assumptions used in each scenario.
- 5.4 Scenario results are presented in two separate tables, each relating to the application of different household headship rates. The 'Option A' results use the CLG 2011-based headship rates and the 'Option B' results use the 2008-based headship rates.

East Hertfordshire

Components of population change

- 5.144 Average annual population growth estimated by the 'SNPP-2012' is 0.96% per year over the 25-year period 2012-37. Natural change has been a dominant component of population change since 2002/03 and this trend continues in the 'SNPP-2012' projection. Historically, the average annual net effect of internal migration upon population growth has been positive and the 'SNPP-2012' suggests a +642 average annual net impact. The positive impact of international migration upon historical growth continues in the 'SNPP-2012' projection.

Component of Change	Historical		Projected
	5-year average (2007/08–2011/12)	10-year average (2002/03–2011/12)	2012-based SNPP average (2012/13–2036/37)
Natural Change	633	592	526
Net Internal Migration	564	325	642
Net International Migration	161	185	171
Unattributable Population Change*	-147	-157	-
Annual Population Change	1,209	944	1,339
Annual Population Change (%)	0.90%	0.73%	0.96%

* UPC is only applicable to the years 2001/02 - 2010/11

Annual Population Change is calculated as a % change from the start year of the time period

Scenario growth summary

- 5.145 The 'SNPP-2012' scenario records a total population growth of 24.0% over the 2012-37 forecast period, slightly higher than the previous 'SNPP-2010' (23.2% estimated growth to 2037).
- 5.146 Alternative trend projections have been developed from the POPGROUP model. Using the historical evidence on growth to set migration assumptions and with the UPC component assigned to international migration, the 'PG-5Yr' and 'PG-10Yr' scenarios record growth below the new 'SNPP-2012' benchmark, 17.2% and 15.3% respectively.
- 5.147 If the UPC component of historical population change is ignored when calculating future migration assumptions, the forecast of population growth for these 'X' scenarios is higher. The 'PG-5Yr-X' scenario records a growth of 18.6%, whereas the 'PG-10Yr-X' scenario records a population increase of 16.7%.

5.148 The EEFM 'Jobs' and 'Employed people' scenarios result in population growth that exceeds other scenarios, at 29.8-33.0%.

5.149 The 'Natural Change' scenario, with no migration impact and with only births and deaths driving growth, results in 6.5% population growth to 2037. The 'Net Nil' scenario which maintains a migration inflow and outflow but applies a zero migration balance, results in higher growth at 7.2%.

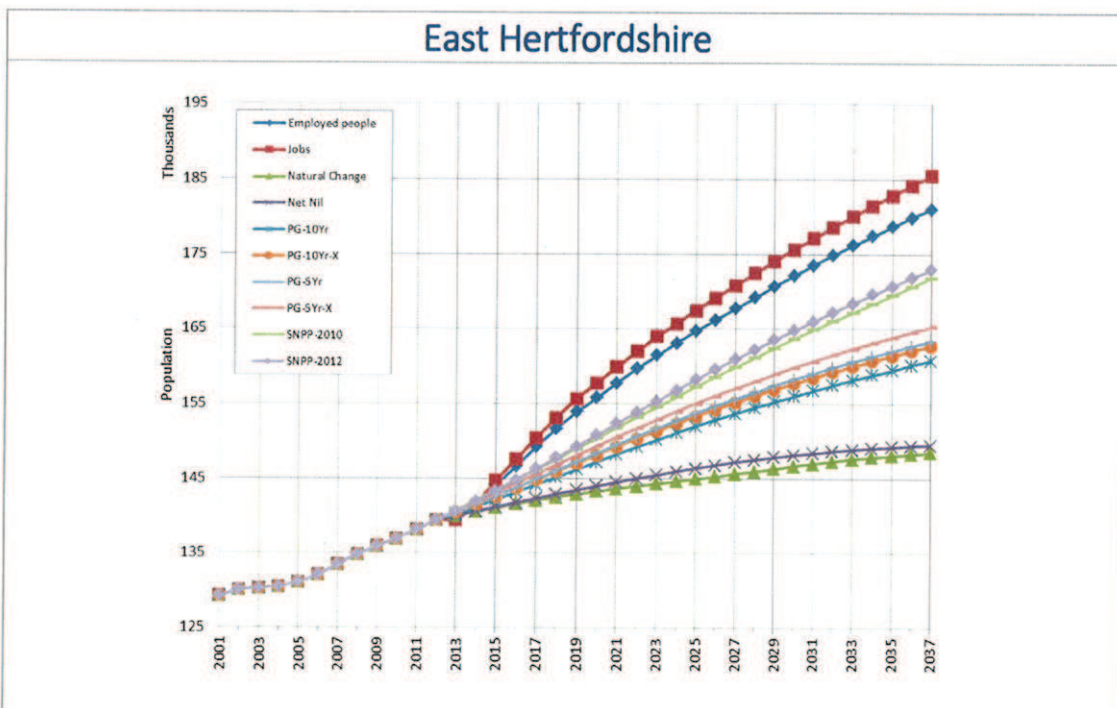
Dwelling growth implications

5.150 The application of the 2008-based household formation rates (Option B) results in a dwelling requirement that is approximately 11.0% higher than that associated with the application of the 2011-based household formation rates (Option A) (this calculation excludes the 'Natural Change' and 'Net Nil' scenarios).

5.151 Considering the average of the A and B alternatives, suggests a dwelling requirement of 526-964 resulting from the 'PG' and EEFM scenarios, with the 'SNPP-2012' recording a growth average of 754 dwellings per year.

Scenario	Average annual dwelling requirement, 2012-37		
	Option A (2011-based)	Option B (2008-based)	Average
Jobs	925	1,004	964
Employed people	853	930	891
SNPP-2010	718	793	755
SNPP-2012	718	791	754
PG-5Yr-X	578	649	614
PG-5Yr	549	619	584
PG-10Yr-X	520	593	557
PG-10Yr	490	561	526
Net Nil	329	389	359
Natural Change	317	381	349

Note: This project does not produce a recommended or preferred demographic forecast for any local authority area. Rather it presents a range of scenarios to inform further assessment and consideration by the individual local authorities. Local circumstances may dictate that certain scenarios are more appropriate than others but, for completeness, all scenarios are presented here.



Option A: 2011-based CLG household model

Scenario	Change 2012 - 2037				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Jobs
Jobs A	46,036	33.0%	22,417	39.0%	1,230	925	540
Employed people A	41,626	29.8%	20,670	35.9%	1,081	853	465
SNPP-2012 A	33,486	24.0%	17,404	30.3%	813	718	329
SNPP-2010 A	32,404	23.2%	17,399	30.3%	845	718	354
PG-5Yr-X A	25,879	18.6%	14,013	24.4%	541	578	192
PG-5Yr A	23,963	17.2%	13,314	23.2%	477	549	159
PG-10Yr-X A	23,333	16.7%	12,618	21.9%	407	520	161
PG-10Yr A	21,323	15.3%	11,884	20.7%	341	490	126
Net Nil A	10,053	7.2%	7,986	13.9%	0	329	-72
Natural Change A	9,019	6.5%	7,682	13.4%	0	317	-170

Option B: 2008-based CLG household model

Scenario	Change 2012 - 2037				Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings	Jobs
Jobs B	46,036	33.0%	24,343	42.3%	1,230	1,004	540
Employed people B	41,626	29.8%	22,534	39.2%	1,081	930	465
SNPP-2012 B	33,486	24.0%	19,163	33.3%	813	791	329
SNPP-2010 B	32,404	23.2%	19,228	33.4%	845	793	354
PG-5Yr-X B	25,879	18.6%	15,733	27.4%	541	649	192
PG-5Yr B	23,963	17.2%	15,002	26.1%	477	619	159
PG-10Yr-X B	23,333	16.7%	14,374	25.0%	407	593	161
PG-10Yr B	21,323	15.3%	13,606	23.7%	341	561	126
Net Nil B	10,053	7.2%	9,420	16.4%	0	389	-72
Natural Change B	9,019	6.5%	9,229	16.0%	0	381	-170

**Greater Essex Demographic Forecasts Phase 6
Main Report September 2014
Summary**

Section 2: Population estimates & projections

Official statistics

- B1 Every two years, the Office for National Statistics (ONS) publishes a national population projection. The national projection is followed by the publication of sub national population projections (SNPP), providing an indication of likely growth in each local authority area over a 25 year period.
- B2 ONS released its 2012-based national population projections in autumn 2013 and followed this with publication of the 2012-based sub-national projections in May 2014.
- B3 The 2012 based national population projection suggests that the population of England will increase by 8.7 million between 2012 and 2037. This equates to an increase of 16.2% over the 25 year projection period; approximately 0.65% per year. This rate of annual population growth is lower than that experienced in the latest 10-year historical period (0.77% per year) or the latest 5-year historical period (0.82% per year).
- B4 Significantly, the 2012-based projection has assumed a lower rate of growth due to international migration than has been recorded in the last five or ten years of evidence.

Section 3: London's demographic influence

Migration relationship

- B5 Greater London plays a significant role in shaping the demographic dynamics of the local authorities within the study area. The migration

relationship is most significant between the north east London Boroughs and the local authorities that are immediately contiguous with the Greater London boundary. For example, during 2006/07 – 2012/13, over 50% of Epping Forest's migrant inflow originated from north east London, compared to approximately 15% of East Herts migrant inflow.

- B6 The analysis of internal migration flows relies upon statistics captured by the process of GP registration; the Patient Register Data Service (PRDS). When an individual relocates, re-registration with a new GP results in a migration event being recorded, identifying where a person has moved from and to. Each household that re-registers will be captured as an individual migrant.
- B7 The level of flow of migration from north east London to the study area reduced significantly following the onset of economic recession in 2008. The migration inflow has started to recover but latest statistics show that it still equivalent to just 85% of the 2007/08 total.
- B8 The 2012-based sub-national population projections suggest the impact of internal migration within the study area will be subject to a significant uplift compared to the most recent 5-year and 10-year evidence.

Greater London Authority growth projections

- B9 Whilst ONS publishes its official sub-national projections for local authority areas, the Greater London Authority (GLA) routinely produces its own population projections for London Boroughs.
- B10 The GLA's latest population and household projections (2013) include four trend-based variants which differ in their choice of internal migration assumptions beyond 2017. With the recession associated with a fall in migration from London to the rest of the UK and a corresponding rise in migration from the rest of the UK to London, the scenario variants are designed to evaluate the 'structural' nature of these shifts in migration patterns.
- B11 Within each of these GLA scenario variants is an expectation of a higher net outflow due to internal migration for the NE London

Boroughs which would have consequences for the projected growth in the study area, particularly for those local authority areas that have historically had a strong migration link with the NE London Boroughs.

- B12 Whilst the GLA forecasts do not provide a definitive view on future population growth in London, this additional demographic evidence is an important component of housing needs assessment for all local authorities in the wider South East. The likelihood of higher (or lower) levels of in-migration from London should be given appropriate consideration when evaluating the suite of growth outcomes presented for each of the local authorities in the study area.

Section 3: Scenario Definition

Scenario context

- B13 The National Planning Policy Framework (NPPF) provides guidance on the development of a robust evidence base to support the development of local housing plans. The guidance makes it clear that data inputs, assumptions and methodology should be robust and should consider future growth potential from a number of perspectives.
- B14 For any local authority area, there is no single, definitive view on the likely level of future growth, with a mix of economic, demographic and national/local policy issues ultimately determining the speed and scale of change. For local planning purposes, it is necessary to evaluate a range of growth alternatives to establish the most 'appropriate' basis for determining future housing requirements.
- B15 The use of a recognised forecasting model (e.g. POPGROUP: as used by Edge Analytics for the Greater Essex Grouping of Local Authorities), which includes industry-standard methodologies ensures a robustness of approach and enables a focus on assumptions and output, rather than methods.
- B16 The scenarios that have been developed for this study include the following:
- Official projections from ONS (2010-based and 2012-based).

- 'Migration-led' trend forecasts using the latest demographic evidence, including an assessment of the importance of the 'Unattributable Population Change (UPC) component.
- Economic growth trajectories, as detailed in the East of England Forecasting Model (EEFM), developed by Oxford Economics.

B17 Each scenario has been evaluated using both 2011-based (Option A) and 2008-based (Option B) household headship rates, providing a 'range' of household and dwelling growth options for consideration.

Alternative trend projections

B18 A five year historical period is a typical time-frame from which migration 'trend' assumptions are derived. This is consistent with ONS official methodology. However, given the unprecedented economic changes that have occurred since 2008, it is important to give due consideration to an extended historical period for assumption derivation.

B19 Alternative scenarios are as follows:

- **PG-5yr**: internal and international migration projection assumptions are based on five years of historical evidence (2007/8-2011/12).
- **PG-10yr**: internal and international migration projection assumptions are based on ten years of historical evidence (2002/3-2011/12).
- **Natural Change**: in-migration, out-migration, immigration and emigration projection assumptions are each set at zero, with only births and deaths determining growth.
- **Net Nil**: migration assumptions are maintained but in-migration and out-migration, as well as immigration and emigration, are set to balance each other, i.e. the net impact of migration is zero.

B20 Two further 'Migration-led' scenarios have been developed as follows:

- **PG-5yr-X:** internal and international migration assumptions are based on the last five years of historical evidence, ignoring the UPC.
- **PG-10yr-X:** internal and international migration assumptions are based on the last 10 years of historical evidence, ignoring the UPC.

Employment-led forecasts

B21 The revised 2013 'Baseline' scenario from the East of England Forecasting Model (EEFM) has provided the latest employment growth forecasts for the study area. For each of the local authorities, the EEFM has identified a forecast of growth measured as both total employment ('Jobs') and the total workplace employed people ('Employed people')

B22 These data provide the basis for the development of two employment-led demographic forecasts:

- **Jobs:** demographic change is constrained to the growth in total employment.
- **Employed people:** demographic change is constrained to the growth in the number of workplace employed people.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 22 OCTOBER 2014

EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

DELIVERY STUDY UPDATE REPORT

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report provides an update on progress with the Delivery Study, a critical piece of the evidence base for the emerging District Plan.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE PANEL:</u> That:	
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(A)	The District Plan Delivery Study Briefing Note from Peter Brett Associates including the implications for the District Plan timeline, and the updated ATLAS Deliverability Advice Note, contained at Essential Reference Papers B and C, be noted.
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<u>RECOMMENDATIONS FOR COUNCIL:</u> That:	
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(A)	The District Plan Delivery Study Briefing Note from Peter Brett Associates including the implications for the District Plan timeline, and the updated ATLAS Deliverability Advice Note, contained at Essential Reference Papers B and C, be noted.
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1.0 Background

1.1 The background to the Delivery Study was set out in the Deliverability Advice Note from ATLAS previously presented to the Panel (see Background Papers).

- 1.2 The District Plan Delivery Study is critical to determining whether or not the development strategy set out in the Preferred Options District Plan can be delivered. The study could result in material changes to the Draft Plan, and important decisions may be needed in terms of the scale of developer contributions to meet wider policy objectives (such as affordable housing) and support the infrastructure needed to deliver the growth. The study Specification has been published (see Background Papers, 17 July 2014).
- 1.3 Paragraph 56 of the Specification states: *“The Council wishes to proceed swiftly with the District Plan, and ideally would like to make a decision to consult on an amended plan at Full Council on 1st October in order to enable a full consultation by the end of the year. In order to achieve this timeline, the Council will need to present an amended Plan to the District Planning Executive Panel on 25th September, the deadline for which is Wednesday 10th September.”*
- 1.4 Paragraph 57 continues: *“The Council recognises that this is a tight timeframe for this challenging commission. Therefore consultants are requested to pay careful attention to the timetabling and prioritisation of the tasks, in order to provide an honest assessment of the feasibility of the proposed timeline.”*
- 1.5 The same Report explained that timely progress with the study will be dependent in large part on prompt receipt of inputs from the appointed consultants, as well as from site promoters and infrastructure providers. As with any work dependent on external parties there are scheduling risks and these will need to be carefully managed.
- 1.6 Peter Brett Associates (PBA) has been appointed to undertake the Delivery Study and an inception meeting took place on 20th August. Since then, PBA has undertaken significant work to review the evidence and identify gaps which will need to be filled before the District Plan can move forwards to an amendments consultation.
- 1.7 In March 2014, the Department for Communities and Local Government published the National Planning Practice Guidance (NPPG), which sits alongside the National Planning Policy Framework (NPPF). The NPPG contains additional guidance in relation to deliverability and the assessment of housing needs as well as other areas of plan making. In preparation of the Delivery

Study, PBA's advice reflects the NPPG as well as the NPPF, and the interpretation of both documents by the Planning Inspectorate. PBA also reflects the Planning Advisory Service guidance on Objectively Assessed Needs (see Background Studies).

2.0 Report

2.1 To date, PBA has undertaken the following activities in preparation for writing up the Delivery Study report:

- Telephone interviews with Thames Water, NHS England, the Clinical Commissioning Group, and Hertfordshire County Council (schools);
- Whole plan viability matrix to assess impact of policies on viability;
- Review of Site Specific Masterplans for the three most complex sites;
- High-level review of transport evidence and telephone interviews with various stakeholders;
- Transport workshop (with adjoining Local Planning Authorities, the Highways Agency, and the Highways Authorities for Hertfordshire and Essex);
- Transport meeting to consider impact on M11 and input into the scope of VISUM modelling to ensure planned growth in E Herts is included.
- Site Promoter Viability Forum (smaller/less complex sites);
- Site Specific Viability Surgeries (large/ complex sites);
- Desk based research to inform viability assumptions;
- Review and guidance on areas of possible risk relating to parallel work on Objectively Assessed Need (OAN) being developed by various others;
- Detailed inception workshop to engage and outline the inter-dependencies of the various study tasks and identify possible study risks; and
- Site visit to better understand the proposed growth areas, the spatial geography, and impact on viability and delivery.

2.2 PBA has prepared a Delivery Study Update attached at **Essential Reference Paper 'B'** which provides a number of headlines from the work carried out so far. The Update contains some challenging advice for the Council around the expectations of the Planning Inspectorate in relation to the calculation of the housing requirement in the first five years of the plan, the duty to co-operate, and the economic development strategy.

- 2.3 The initial view from PBA is that the Planning Inspectorate is unlikely to be convinced that congestion stemming from growth can be used as a reason for inhibiting growth proposed within the draft District Plan. However, managing congestion is one of the factors likely to be of local importance and PBA has identified gaps in the approach to transport planning. These will need to be addressed by the Council, working in partnership with other stakeholders including the Transport and Highways Authority, as part of an ongoing process of transport planning.
- 2.4 Going forward to adoption of the plan and beyond, including future plan-making stages, and taking account of the evidence from the transport modelling, it will be for the Council in partnership with the Transport and Highways Authority to develop measures to manage and mitigate congestion arising from the cumulative impacts of growth. However, even with such measures in place it may not be possible to fully mitigate increased congestion.
- 2.5 The role of transport modelling should therefore be understood in terms of focusing attention on the main congestion hotspots arising from growth, and enabling targeting of appropriate mitigation measures.
- 2.6 Physical mitigation measures involving highways engineering may form part of the approach. However, PBA has advised that in many cases, particularly in town centres and locations where the options for such schemes are limited, 'softer' measures to reduce reliance on the car may need to be the main focus of attention.
- 2.7 The advice from PBA is consistent with the advice from ATLAS in the Deliverability Advice Note. ATLAS has updated this note (**Essential Reference Paper 'C'**) to include a recent example from the Rotherham Local Plan examination.

Timeline

- 2.8 Responding to the requirements of Paragraph 57 of the Specification, PBA has advised that East Herts Council should take account of the evidence from a number of modelling studies which have significant cross-boundary impacts and are due to report this autumn, most significantly the VISUM model, which covers Bishop's Stortford, Sawbridgeworth and the Gilston Area.
- 2.9 PBA has also advised that East Herts Council should take account of the evidence arising from the new joint Strategic Housing Market Assessment (SHMA), which is also due this

autumn. As noted in the section on 'Critical Dependencies', "*the ongoing work on the OAN (Objectively Assessed Needs) could amend or change the scale of growth required during the plan period*". As part of the Delivery Study, PBA will engage with the emerging SHMA and advise the Council on the implications for the District Plan housing requirement.

2.10 PBA considers the outputs from this new evidence to be critical to the robustness of the Delivery Study. Therefore it has not been possible to achieve the timeline set out in the Specification, as repeated in Paragraph 1.2 above. This has implications for the District Plan Work Programme.

2.11 The Council continues to make strenuous efforts to progress the District Plan as swiftly as reasonably possible, and consistent with the objective of achieving a sound 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

The following reports were presented to the District Planning Executive Panel:

- Delivery Study Update Report, 17 July 2014
- Infrastructure Topic Paper, 16 January 2014, see also www.eastherts.gov.uk/infrastructure
- District Plan Update Report, 3 October 2013
- ATLAS Strategic Sites Deliverability Advice Note, District Plan Update Report, Essential Reference Paper 'E', 3 October 2013
- Objectively Assessed Need and Housing Targets – Planning Advisory Service Technical Advice Note (June 2014)

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

<p>Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):</p>	<p>People – Fair and accessible services for those that use them and opportunities for everyone to contribute</p> <p>This priority focuses on delivering strong services and seeking to enhance the quality of life, health and wellbeing, particularly for those who are vulnerable.</p> <p>Place – Safe and Clean</p> <p>This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p>Prosperity – Improving the economic and social opportunities available to our communities</p> <p>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>
<p>Consultation:</p>	<p>The consultants are undertaking consultation with relevant parties including site promoters and infrastructure providers as part of the study.</p>
<p>Legal:</p>	<p>None identified.</p>
<p>Financial:</p>	<p>The Hertfordshire Local Enterprise Partnership (LEP) is contributing towards the cost of the study. The Council has applied to the Department for Communities and Local Government (DCLG) for funding for the remainder of the study through the Large Sites Infrastructure Programme (LSIP).</p>
<p>Human Resource:</p>	<p>None other than that related to project management requirements during the completion of the study.</p>
<p>Risk Management:</p>	<p>Not having robust evidence in relation to delivery of development would mean that the Council would be likely to have the Plan declared unsound at Examination.</p>
<p>Health and wellbeing – issues and impacts:</p>	<p>The Delivery Study includes assessment of the impacts of development on health infrastructure, including GP surgeries and other facilities.</p>

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ESSENTIAL REFERENCE PAPER 'B'

Job Name: East Herts Delivery Study
Job No: 31122-4505
Date: 25 September 2014
Prepared By: PBA Team – John Baker, Jo Lee, Elliot Page, Shilpa Rasaiah
Subject: **East Herts Delivery Study Update**

Study Scope

1. PBA have been commissioned by East Herts Council to inform deliverability of the Local Plan, focusing on viability, infrastructure, objectively assessed need (OAN), transport and a more in depth assessment of a number of strategic / broad locations of growth. This study will form a critical piece of the evidence base for the Local Plan Examination in demonstrating to the examiner whether you have a deliverable and developable plan.
2. This note sets out initial findings from the review of the OAN, transport infrastructure evidence and critical dependencies going forward.

Objectively Assessed Need

3. The current housing requirement set out is 750 dwellings per annum (dpa) which is essentially an average of a variety of demographic projections, but based primarily on the 2011 interim household projections which only go to 2021 and with some calculation made about the period beyond that, and which household formation rates to use.
4. This 750 figure is not based on an up to date Strategic Housing Market Assessment (SHMA) as required by the NPPF. A SHMA has now been commissioned jointly and ORS are currently undertaking this work to assess the extent of the housing market area and to robustly test the Objectively Assessed Need (OAN). The Welwyn Hatfield SHMA has just been published and it will be necessary to consider this in terms of the methodology used and also of any overlap of housing market areas to ensure the implications for East Herts are understood and that these are adequately factored into discussions through the duty to cooperate.
5. OAN is an evidence-based figure and will need to consider all the demographic sources of information together with the economic drivers of growth to ensure that the figure accurately identifies the full OAN. It is likely to consider a range of scenarios which will provide a starting point against which it is necessary to understand the market signals and consider which scenario best represents the likely future of East Herts. As part of this assessment it will be essential to consider whether the 10 year migration trend which includes 3 years of net out migration is a robust set of assumptions to use going forward, understanding why this net out migration took place and recognising that increased migration from London is going to be a big issue for all the Local Planning Authorities in the south-east and potential beyond
6. A key part of establishing a robust figure means ensuring that economic issues within the plan are fully integrated with the strategy for housing growth. This ensures that if the Council wants to achieve a certain number of jobs over the plan period these are realistic and also tested in terms of the labour supply that will be required to deliver these jobs and the number of homes required to house that labour supply.
7. At present there does not appear to be a clearly articulated connection with economic growth work to establish the OAN. The East of England Forecasting Model (EEFM) numbers tested by Edge use 600 jobs a year which leads to a requirement of between 925 and 1004 dwellings per annum (dpa). It is currently unclear what evidence this level of jobs is based on and as a separate point how realistic they are. The draft Local Plan currently seeks 9700 jobs over the plan period (485

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per year) and it is essential that this is a robust figure and is also tested for its implications in terms of the housing requirement. The Council will need to assess the realistic economic growth potential of East Herts against these figures.

8. Market signals are an important factor which need to be addressed as part of the SHMA and help establish a robust OAN. Another equally important issue is affordability and the weight to be given to meeting the affordable housing need.
9. It is essential that the OAN is established separately from the decision about plan provision (or housing land supply).
10. The provision made in the plan can be different from the OAN figure. This may be due to the policy issues and constraints that exist and which when factored in mean that the full OAN cannot be met. However, any unmet need should be met elsewhere in the housing market area through the duty to cooperate. As housing and economic issues are key strategic issues their distribution across the housing market area needs to be discussed with your neighbours to come to an agreed decision.
11. In terms of five year land supply the figure of 750 emerging from the plan and ONS/CLG projections is a robust starting point (subject to the points made earlier) and as such is likely to be used by Inspectors in the absence of a more up to date and tested SHMA figure.
12. In principle, any shortfall within the plan period, against this 750 figure, or the figure in place at the time, will need to be accommodated in the first five years. This is clearly set out in the practice guidance and is supported by Inspectors, who are keen to ensure that a five year supply is available at all times in order to significantly boost supply, meeting the needs that exist now and not putting this off until the end of the plan period. There are cases where an approach which spreads the shortfall over the whole plan period has been accepted by DPD inspectors, and this is usually where there are significant sustainable urban extensions and infrastructure issues which mean delivery will not be achieved in the short term. However, this is an area which is constantly changing as new decisions emerge and PBA stress the risk of following other authorities which may not have comparable circumstances.
13. In relation to the approach to spreading the shortfall as proposed in the draft District Plan, work is not sufficiently advanced yet to know whether the phasing of sites and linking this with the plan target is sufficiently justified, and the information is not yet available to be definitive about that approach, particularly in relation to individual sites. East Herts is right not to want to rule it out at this stage, however the Council should be aware that the level of evidence needed to justify this approach would be considerable. This is an area that the Delivery Study will advise on as part of the OAN work (Task 8).
14. In terms of applying the buffer of either 5% or rising to 20% where there has been persistent under-delivery, the figures provided demonstrate that East Herts has consistently failed to meet the requirement both on an annual and cumulative basis and as such it is our view that a 20% uplift should be applied to the supply to provide flexibility.

Transport review to date

15. PBA effort has focused on getting an understanding of the transport evidence that is being produced by site promoters, the County Councils, the Highway Agency and the adjoining authorities to inform the transport infrastructure, costs and funding that will be needed to support the delivery of growth.
16. PBA have also met with and facilitated meetings with various transport consultees to seek to understand the key issues that are likely to inform the Inspector's agenda at the Local Plan examination and to begin to consider how these may need to be addressed. Note detailed interrogation of modelling inputs provided by individual site promoters will be undertaken by HCC.

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17. The assessment of transport is best considered at the following three levels:

- The impact on the **strategic highway network** – The main considerations for this are the M11 junctions 8, 7 and 7a, A1/M1 junctions 3 and 4 and the M25 junction 25/ A10 intersection. It will be for the Highway Agency to state if there are any concerns relating to the strategic road network that will impact on the delivery and phasing of growth. At present, based on the latest information and assessment, and the meeting held on the M11 developments, it was confirmed that the growth proposals impact on the strategic network are an ‘amber’ i.e. known impacts can be managed, and it is ok to proceed with the Delivery Study assessment of the proposed growth scenarios for now. Detailed modelling evidence from the VISUM will inform mitigation measures and phasing implication. These findings are expected in November. It should be noted that the role of the Highway Agency is to generally facilitate development in keeping with the Government priority of delivering growth, so would not look to object to schemes except in the case of a severe impact on safety.
- The impact of the **development on the immediate local transport network** - site promoters are undertaking various modelling of their specific schemes to see how they can connect and provide the transport infrastructure to support their developments. Generally solutions to specific sites are expected to be met and the promoters are likely to want to demonstrate that these are viable and deliverable. These findings will be explored in a series of surgeries with developers and ongoing discussions between now and October. The infrastructure requirements, costs and funding mechanisms will be captured in the Delivery Study and will inform the viability assessment.
- The **cumulative impact of overall development** on key road networks, primarily through the centres of Hertford (A414), Bishop’s Stortford, Ware and Sawbridgeworth, and local networks such as the A414 and A10 and A120. The Delivery Study assessment to date notes there is a gap in assessing the cumulative impact of growth on town centres. PBA advised that Inspectors acknowledge that not all the modelling evidence will necessarily be available at the time of the Plan preparation, as long as there is sufficient information to inform the five year supply and there is a process in place for managing future impact. It will therefore be for the District Council in partnership with the various Highways Authorities and other stakeholders to develop measures to manage and mitigate congestion arising from the cumulative impacts of growth. The proposed Broad Locations DPDs and the County Council’s Growth and Transport Plans should develop policies and actions to address this issue, whilst a ‘live IDP’ and accompanying ‘delivery mechanism’ will need to manage infrastructure delivery on an ongoing basis. A certain degree of congestion is to be expected to accommodate future growth. What will be important is to seriously consider what mitigation measures are likely to be necessary to minimise and manage congestion.
- It is accepted by the Planning Inspectorate that, for later years of the Local Plan, providing a comprehensive picture of infrastructure requirements becomes increasingly difficult and a more generalised approach is needed. The lack of detailed modelling on cumulative impact is not considered to be a reason for not progressing with the Local Plan.
- It will be necessary to further explore and understand Hertfordshire County Council’s position as Local Highways Authority in relation to the proposed growth. PBA will work with HCC during October and November to identify an initial list of congestion ‘hotspots’ and possible mitigations and/or strategies for future consideration to inform the Delivery Study and IDP. PBA has also initiated a series of consultations with site promoters in order to raise their awareness of the cumulative impacts of growth and to ask the promoters to suggest how they intend to assess and mitigate cumulative impacts. This is a new area of work, that has not been considered by most of the site promoters and so is likely to be developed over time in partnership with the Local Authorities and LEPs.

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- From PBA's experience and discussions with Planning Inspectors, congestion is rarely viewed as a reason for not allowing growth. The LA is preparing a Local Plan to meet the needs of the whole community – both existing and future. Although existing communities may object on the grounds of car congestion, Inspectors are unlikely to see this as a reasonable basis for objecting to growth. The Delivery Strategy will include the emerging issues being identified, and consider how the Council should address these in setting out a delivery strategy that an Inspector can reflect on. It is likely that a considered strategy will be required as to how to promote and encourage greater use of alternative modes of transport, in addition to implementing any mitigation measures that can be introduced.

Critical dependencies

18. The ongoing work on the OAN could amend or change the scale of growth required during the plan period. For now a watching brief is being kept on the work and guidance provided to the client team on areas of work that should be addressed to strengthen the robustness of the assessment being undertaken by ORS.
19. As part of the IDP and Delivery Study, one of the recommendations will be that an 'infrastructure delivery mechanism' should be established. The purpose of this will be to support the delivery of growth in a timely manner by maintaining the IDP as a 'live document' and to show to the Examiner and community that there is a mechanism in place to manage infrastructure delivery.



ESSENTIAL REFERENCE PAPER C

Strategic Sites Deliverability Advice Note

29-08-14

1. Introduction

This note sets out advice on key infrastructure and site deliverability considerations at emerging potential strategic sites. It follows discussion regarding delivery of major, cross boundary sites through the draft Local Plans. It focuses on two key aspects:

- 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, reflecting upon the current available information and potential requirements of the plan making system.

In this note, the term 'strategic site' refers to both Strategic Site Allocations (SSA) 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.

This note draws on general guidance on deliverability, namely:

- National Planning Policy Framework (NPPF)
- National Planning Practice Guidance (NPPG)
- The Planning Inspectorate - Examining DPDs: Learning Lessons from Experience' (September 2009)
- Planning Advisory Service (PAS) - 'Successful plan-making: Advice to practitioners' (July 2013)
- Harman Review of Viability Evidence for Plan Making

3. 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.

(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 and increasingly under scrutiny by PINS. 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.

4. 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?

5. 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 advice by the Local Housing Delivery Group chaired by Sir John Harman (2012) and the 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:

- Maximise the scope for alignment of assessments such as CIL and Local Plan viability testing. This will help with 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).

6. Lessons from Examinations

Review of Examinations

To supplement the above principles ATLAS has identified 11 Local Plans whose Examinations raise particularly relevant issues in relation to deliverability of strategic sites. The review focusses 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). It considered:

- 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 examinations that were investigated are set out in the table below and the detailed findings are set out in Appendix 1 (separate document).

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.

Development Plan	Decision
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

7. 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 impacts 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)¹.
- 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).

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

Strategic Sites Deliverability Advice note

Appendix 1: Detailed Findings of Review

<p>Local Planning Authority: Central Lancashire Authorities (Preston City Council and South Ribble and Chorley Borough Councils)</p>	<p>Name of Inspector: Richard E Hollox</p>
<p>Development Plan: Draft Central Lancashire Core Strategy</p>	<p>Decision: Sound, subject to additional modifications. Inspector's Report 07-06-12</p>
<p>Background 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>Overall Approach 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"> • Central Preston Strategic Location (including City Centre, Inner East Preston, Thithebarn Regeneration Area and the new Central Business District) • North West Preston (including Higher Bartie and Broughton/Land at Eastway <i>(addition)</i>) • South of Penwortham and North of Farington <i>(addition)</i> <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>Key Relevant Issues</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"> • 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"> ○ 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; ○ 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." • 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. • 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..." 	

- When discussing locations of growth in other places, the Inspector refers to the strength of a 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.

Local Planning Authority: Plymouth City Council	Name of Inspector: Andrew Seaman
Development Plan: Draft Derriford and Seaton Area Action Plan 2006-2021	Decision: The Plan does not provide an appropriate basis for the planning of the Area and is consequently not sound. (23-08-13)
<p>Background The Plan was examined in March 2013, prior to the revocation of the Regional Spatial Strategy for the South West.</p> <p>Overall Approach 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>Inspector's Key Concerns on deliverability</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"> • 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. • Viability evidence shows that speculative office development is not currently commercially viable. <p><i>Policy DS07 - Tamar Science Park (20,000sqm)</i></p> <ul style="list-style-type: none"> • 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). <p><i>Policy DS13 – Seaton Neighbourhood (Approx. 770 homes, 4,500sqm local centre)</i></p> <ul style="list-style-type: none"> • 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). <p><i>Policy DS16 - District Centre (approx. 8,000sqm)</i></p> <ul style="list-style-type: none"> • 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. <p><i>Policy DS08 – Crownhill Retail Park (approx. 80 homes and 2,000sqm offices)</i></p> <ul style="list-style-type: none"> • Again little evidence that this would be deliverable. <p><i>Policy DS12 – Glacis Park (15,000sqm offices and 700 homes)</i></p> <ul style="list-style-type: none"> • Viability evidence does not support the deliverability of the proposed office content. <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</p>	

be secured. Key issues include:

- 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.

<p>Local Planning Authority: East Hampshire District Council (EHDC) and South Downs National Park Authority (SDNPA)</p>	<p>Name of Inspector: Anthony Thickett</p>
<p>Development Plan: East Hampshire District Local Plan Joint Core Strategy</p>	<p>Decision: Significant concerns, further work required to before the plan could be found sound. Inspector's Letter 23-11-12</p>
<p>Background 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"> • Produce an up to date SHMA to assess the need for housing and affordable housing • 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 • 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) • 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) • 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 <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>Overall Approach</p> <ul style="list-style-type: none"> • 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) • 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 <p>Whitehill Bordon Strategic Allocation <u>Key evidence on delivery:</u></p> <ul style="list-style-type: none"> • Interim Statement and Infrastructure Schedule (CD11/E13) - sets out specific infrastructure requirements for Whitehill Bordon (total cost estimated as approx. £215m). • Viability Assessment of Whitehill and Bordon Eco-town Masterplan (CD11/WBV02) – based on a set of key assumptions and sensitivity testing. • A comprehensive Statement of Common Ground between EHDC/SDNP and Whitehill & Bordon Eco-Town Landowners' Group (CD12/SOCG5) addresses the following: <ul style="list-style-type: none"> ○ Memorandum of Understanding between landowners ○ Existence of a Delivery Board ○ Existence of an overall Eco-town masterplan ○ Commitment to submit an outline application ○ Representations made, issues agreed and proposed modifications ○ 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). ○ Agreed approach to addressing viability and delivery issues. <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)

Local Planning Authority: Fareham Borough Council	Name of Inspector: Michael J Hetherington
Development Plan: Draft Fareham LDF Core Strategy	Decision: 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

Local Planning Authority: Halton Borough Council	Name of Inspector: Robert Yuille
Development Plan: Draft Halton Core Strategy Local Plan	Decision: Sound, subject to additional modifications. Inspector's Report 12-10-12
<p>Overall Approach</p> <ul style="list-style-type: none"> • 4 key Areas of Change • Some but not all sites formally allocated as Strategic Sites (Broad identification of infrastructure requirements) • Commitment to prepare future Site Allocation and Development Management DPD • Commitment to update existing SPD for some sites <p>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?</p> <p><u>3MG, South Widnes, West Runcorn</u></p> <ul style="list-style-type: none"> • No insurmountable flooding problems – their selection or ability to deliver has not been seriously challenged. <p><u>East Runcorn</u></p> <ul style="list-style-type: none"> • 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). • 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. 	
<p>Lessons</p> <ul style="list-style-type: none"> • Infrastructure required to support new development at SSAs may also be required to support new development elsewhere. 	

Local Planning Authority: Melton Borough Council	Name of Inspector: Harold Stephens
Development Plan: Draft Melton LDF Core Strategy	Decision: Plan withdrawn following the Inspector's preliminary conclusion that it was not sound. 19-04-13
<p>Overall Approach</p> <ul style="list-style-type: none"> • SUE to Melton Mowbray (1,000 homes up to 2026) (reference made to preparing an AAP for the SUE) (specific infrastructure identified in policy) • Other housing sites in Rural Centres and Sustainable Villages to be allocated in a future Land Allocations and Settlement Boundaries DPD <p>Examination</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"> • The Plan was not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements; • Inadequate plan period of 13 years at most; • Inadequate evidence to substantiate the apportionment of 80% of total development to Melton Mowbray and 20% to Rural Centres and Sustainable Villages; • 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 • Concerns about Sustainability Appraisal and process. <p>In the face of such fundamental concerns, the Council withdrew the Plan.</p> <p>Deliverability Issues</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"> • 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). • 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. • 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. <p><u>Inadequate requirements in Infrastructure Delivery Plan</u></p> <ul style="list-style-type: none"> • The requirements in the IDP are not adequate to meet the Police's infrastructure requirements in conflict with para 182 of NPPF. • 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. 	

- 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.

Local Planning Authority: Milton Keynes Council	Name of Inspector: Mary Travers
Development Plan: Draft Core Strategy	Decision: Sound, subject to additional modifications. Inspector's Report 29-05-13
<p>Overall Approach 2010 to 2026 target = 28,000 homes 2010 to 2016 = 10,500</p> <ul style="list-style-type: none"> • 4,177 already built (2010-2013) • 19,759 on existing sites (existing Allocations/sites with planning permission) • 2,900 from new Strategic Land Allocation to south east of City (to be supported by an SPD) • 1,760 in sustainable settlement in rural area – with a future Site Allocations Plan to identify 600 homes <p>Housing Delivery:</p> <ul style="list-style-type: none"> • 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. • 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). • 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). • 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. <p>Transport:</p> <ul style="list-style-type: none"> • 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). • 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. <p>Environmental Standards/Decentralised Energy (DE):</p> <ul style="list-style-type: none"> • 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. <p>Place-shaping principles for SUEs in adjacent Local Authorities</p> <ul style="list-style-type: none"> • 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. <p>Infrastructure Delivery:</p> <ul style="list-style-type: none"> • 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. • 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. 	

- 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.

Local Planning Authority: Newark and Sherwood District Council	Name of Inspector: Michael J Hetherington
Development Plan: Draft Newark and Sherwood Core Strategy	Decision: Sound, subject to additional modifications. Inspector's Report dated 11-03-11
<p>Background 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>Overall Approach</p> <ul style="list-style-type: none"> • 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) • Address regeneration and growth needs by focusing remaining growth in Service Centres (20% of overall growth) and Principal Villages (10%) • 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 • Identify other sites to meet needs in a separate Allocations and Development Management DPD (adopted in July 2013). <p>Matters 11/12 Strategic Sites.</p> <p>i) Is there robust and realistic evidence to justify the nature and extent of the site designations and proposed distribution of uses?</p> <p>ii) Are the locations and sitings suitable, sustainable and appropriate?</p> <ul style="list-style-type: none"> • 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. • The Inspector was satisfied that the District Wide Transport Study and associated traffic modelling had established the need for a Southern Link Road (SLR). <p>Matters 11/12 Strategic Sites</p> <p>iii) Can the proposals be delivered or are there any significant constraints?</p> <p>iv) Is the impact on the local areas acceptable in principle?</p> <p><u>South of Newark</u></p> <ul style="list-style-type: none"> • 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. • Reference made to information submitted in support of current planning applications (including an Environmental Statement) • The IDP was discussed at the examination hearing and held up to scrutiny – giving the Inspector confidence about delivery of infrastructure • 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). • 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. <p><u>East of Newark</u></p> <ul style="list-style-type: none"> • 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). • 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 • 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.

- 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.

Local Planning Authority: Tamworth Borough Council	Name of Inspector: David Vickery
Development Plan: Draft Tamworth Local Plan (2006-2028)	Decision: Plan withdrawn following the Inspector's recommendation. 05-04-13
<p>Background</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>Overall Approach</p> <ul style="list-style-type: none"> • Strategic Housing Allocation of Amber Valley Sustainable Urban Neighbourhood (at least 1,150 homes) (specific infrastructure requirements identified) • 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) • Other un-allocated sites identified in SHLAA <p>Inspector's Key Concerns</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"> • The SHMA (B8) proposes a certain geographical distribution of housing around wards, but the Plan does not achieve this. <p><u>Allocations</u></p> <ul style="list-style-type: none"> • 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) • 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 • 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? <p><u>Residential Development</u></p> <ul style="list-style-type: none"> • 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. • 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). • 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)). • 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? 	

- 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).

Local Planning Authority: Taunton Deane Borough Council	Name of Inspector: John R Mattocks
Development Plan: Taunton Deane Core Strategy 2011-2028	Decision: Sound, subject to additional modifications. Inspector's Report 03-07-12
<p>Background 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>Overall Approach</p> <ul style="list-style-type: none"> • Strategic Sites (Allocations) for sites in Taunton and Wellington to deliver 5-year housing requirement (specific infrastructure requirements identified) • Broad Locations for growth identified at Staplegrove and Comeytrowe/Trull to deliver growth after 2015 (emphasis on masterplanning to identify and deliver infrastructure requirements) • Commitment to prepare a future Site Allocations and Development Management DPD to Identify Strategic Sites in <ul style="list-style-type: none"> ○ Broad Locations ○ Major Rural Centres ○ Minor Rural Centres and ○ Review allocations in adopted Taunton Town Centre AAP <p>Topic Area 5 – Deliverability, Transport and Infrastructure</p> <ul style="list-style-type: none"> • 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. • 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. • 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. • 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." <p>Topic Area 6 – The spatial strategy, Taunton strategic sites and broad locations</p> <ul style="list-style-type: none"> • 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. • 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). • Crown Estates suggested that development may be more rapid than assumed in the housing trajectory at Priorswood/Nerrols • 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 • In terms of two 'broad locations' for urban extensions at Staplegrove and Comeytrowe <ul style="list-style-type: none"> ○ Important distinction from allocated sites (less detail on precise development requirements and infrastructure provision) ○ 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) ○ Policies SS6 and SS& for the two broad locations require masterplans to identify 	

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>Local Planning Authority: Winchester City Council and South Downs National Park Authority</p>	<p>Name of Inspector: Nigel Payne</p>
<p>Development Plan: Winchester District Local Plan Part 1 – Joint Core Strategy</p>	<p>Decision: Sound, subject to additional modifications. Inspector's Report 11-02-13</p>
<p>Background The Plan was examined in October and November 2012. This was before the revocation of the SE Plan.</p> <p>Overall Approach 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"> • 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). • 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 • North Whiteley – approx. 3,500 homes - reference (amongst other things) to: <ul style="list-style-type: none"> ○ 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; ○ 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; ○ Undertake a full TA to ensure that the package of mitigation measures are incorporated into the scheme; ○ Complete Whiteley Way at an early stage of development; ○ 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 ○ Include a Green Infrastructure Strategy. • 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. <p>Issue 5 – West of Waterlooville</p> <ul style="list-style-type: none"> • The Inspector was satisfied that following various permissions and commencement of development, delivery should proceed in accordance with the housing trajectory. • 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). • 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.” <p>Issue 6 – North Whiteley</p> <ul style="list-style-type: none"> • 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 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.

Local Planning Authority: Rotherham	Name of Inspector: Richard Hollox
Development Plan: Rotherham Core Strategy	Decision: Sound, subject to additional modifications. Inspector's Report 30 June 2014.
<p>Background Document submitted for Examination 6 June 2013 Examination hearings held between 22 October and 6 November 2013 and on 15 May 2014.</p> <p>Overall Approach Hierarchy of settlements identified, acknowledging the primary role of Rotherham for services etc. It takes 38% of growth, including Bassingthorpe Farm. Main modifications establish Waverley as a Principal Settlement.</p> <p>Having assessed 10 alternative broad locations/ urban extensions, the Council selected Bassingthorpe Farm and Dinnington East. Both were supported by the Inspector as sustainable locations for growth. Bassingthorpe Farm in particular was well located next to the built-up area of Rotherham with access to its town centre services and the employment in the inner urban area.</p> <p>Bassingthorpe Farm The site will be allocated for 2,400 dwellings, of which about 1,700 would be built in this plan period. Inspector agreed with the Council that sufficient work had been undertaken for this site to be put forward as a Strategic Allocation rather than Broad Location, but required the preparation of a masterplan to guide development. He was confident that the land could be brought forward sooner rather than later.</p> <p>The site was supported by a Concept Framework setting out details of the constraints to development and the opportunities, the level of mitigation required its impact upon development capacity and viability. Heritage is a major is as the Grade I Listed Wentworth Woodhouse and the Grade II* Wentworth Woodhouse Parkland Registered Historic Park and Garden (along with other listed Buildings) are within the area of search. Amendments resulting from Duty to Cooperate with English Heritage resulted in the production of a Heritage Impact Assessment and the withdrawal of English Heritage's objection to this Core Strategy proposal.</p> <p>Land is also removed from green belt for this allocation.</p> <p>Infrastructure delivery The Inspector was given confidence in the monitoring and delivery of the IDP, and the timely provision of the infrastructure on which it depends, due to the Council's appointment of a lead officer with special responsibility for this and establishment of an Infrastructure Delivery Group (IDG). This will include officers, members and service providers. The Group's functions will include assessing the progress of the strategy, and addressing actual and potential departures from the strategy.</p> <p>On the issue of certainty, the inspector said "The Core Strategy has been prepared in uncertain times and it would be rash to predict certainty in the future, especially during a 15 year period. Indeed, the IDS notes that it <i>has been prepared against a backdrop of the current economic climate</i>. It identifies a funding gap of nearly £55,000,000. These circumstances do not invalidate the Core Strategy's provisions for infrastructure and its funding, and it is significant that no infrastructure provider has maintained an objection to the Core Strategy." The fact that the Council has a good track record in the provision of infrastructure was also a factor.</p>	
<p>Lessons:</p> <ul style="list-style-type: none"> • A plan can't expect to have certainty on all matters; in relation to lack of joint SHMA with Sheffield the Inspector felt the Council had been pragmatic in its assumptions given Sheffield did not want to undertake a joint assessment. "As Ivan Turgenev reminds us, <i>If we wait for the moment when</i> 	

everything, absolutely everything, is ready we shall never begin.”

- phasing of a site or sites based on preference to others (eg because its brownfield) should be removed from the plan. If a site is sustainable for development it should not be restricted by phasing.
- Inspector supported The Council's view that adequate work had been done on Bassingthorpe Farm for it to become a Strategic Allocation.
- Regarding infrastructure the Inspector found that the Council's policies and proposals are as realistic as they can be, despite a host of uncertainties. There is a reasonable prospect that the planned infrastructure will be deliverable in a timely fashion.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 22 OCTOBER 2014
EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING
AND TRANSPORT

DUTY TO CO-OPERATE - UPDATE REPORT

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents the notes of the latest round of Member-level meetings with adjoining Local Planning Authorities
- It also sets out progress in setting up the 'Co-Operation for Sustainable Development Group' involving authorities in eastern Hertfordshire, western Essex, and north London.

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

(A)	the notes of Member-level meetings held with Stevenage and Welwyn Hatfield Councils, be noted; and

(B)	the Terms of Reference for the 'Co-Operation for Sustainable Development Group' of Authorities, be noted.

RECOMMENDATIONS FOR COUNCIL: That:

(A)	the notes of Member-level meetings held with Stevenage and Welwyn Hatfield Councils, be agreed; and

(B)	the Terms of Reference for the 'Co-Operation for Sustainable Development Group' of Authorities, be noted.

1.0 Background

1.1 A report to the District Planning Executive Panel on 28th November 2012 (see Background Papers) explained the background to the Duty to Co-Operate and its implications for the

East Herts District Plan. The report explained that the duty required the Council as Local Planning Authority to engage constructively with a range of bodies at the formative stages of plan-making. The duty also applies to other public sector bodies such as the County Council.

- 1.2 The report of 28th November 2012 explained that one of the most complex areas of the duty is around the issue of cross-boundary strategic priorities, in particular in relation to the issue of unmet housing need, which applies in the case of districts with little physical capacity to accommodate their housing and development needs.
- 1.3 The report sought agreement for the Executive Member for Strategic Planning and Transport to be authorised to represent East Herts Council in meetings with the relevant Member(s) from neighbouring local planning authorities, Hertfordshire and Essex County Councils, and other relevant bodies.
- 1.4 It was agreed that the notes of all Member-level meetings would be reported back to the District Planning Executive Panel. The agreed notes of all meetings to date have been presented to the District Planning Executive Panel and posted online at www.eastherts.gov.uk/DutytoCooperate
- 1.5 A previous report to this Panel (see Background Papers, 25 July 2013) sought the endorsement of Members to the Hertfordshire Infrastructure and Planning Partnership (HIPP) Memorandum of Understanding (MoU). The MoU seeks to establish a framework for co-operation between the eleven local authorities in Hertfordshire and for the partnership to engage with other relevant organisations, both within Hertfordshire and beyond the county boundary.
- 1.6 The Council agreed a Memorandum of Understanding with Uttlesford District Council in relation to its draft Local Plan (see Background Papers). It is anticipated that an MoU with Welwyn Hatfield Borough Council will be presented to Members through a Non-Key Report during 2014.

2.0 Report

- 2.1 Subsequent to the Duty to Co-Operate meetings detailed above, further meetings have taken place with Stevenage and Welwyn Hatfield Councils. The notes of these meetings are attached at

Essential Reference Paper ‘B’. Welwyn Hatfield Council has agreed the notes of the meeting as presented here. Stevenage Borough Council has not yet responded to requests for comment on the meeting notes, but is aware that they are being considered by the Panel and will therefore be public. A further round of meetings with adjacent authorities is currently underway. Notes of any further meetings undertaken will be added to the website as they become publicly available.

- 2.2 According to the Planning Advisory Service (PAS), strategic planning continues to be main stumbling block at the Examination of Local Plans. There is increasing acceptance that difficult issues need to be addressed to ensure that Local Authorities control development. However, PAS advises that there needs to be better understanding that emphasis must be on good strategic planning policies, not just on meeting the Duty to Cooperate. There also needs to be recognition that managing strategic planning effectively needs strong leadership (Member and officer) and robust governance and working arrangements.
- 2.3 With these principles in mind, the authorities in the Essex/London/Hertfordshire area have sought to establish a suitable mechanism to progress cross-boundary strategic planning. A flexible grouping known as the ‘Co-Operation for Sustainable Development Group’ (abbreviated as the ‘Co-Op Group’) has been identified. It includes the following authorities: East Herts, Broxbourne, Harlow, Epping Forest, Uttlesford, Chelmsford, Redbridge, Enfield, Waltham Forest, Hertfordshire, and Essex, plus the Greater London Authority.
- 2.4 The principles upon which the Co-Op Group has been founded are similar to those underlying the Memorandum of Understanding already endorsed by the Council in relation to the 11 Hertfordshire authorities working together through the Hertfordshire Infrastructure and Planning Partnership (HIPP).
- 2.5 As a first step towards establishing formalised arrangements for the Co-Op Group, an Officer group has been established. The Officer group Terms of Reference are presented at **Essential Reference Paper ‘C’**.

2.6 A PAS-facilitated workshop for Portfolio holders from the respective authorities in the Co-Op Group area was held on 15th September 2014, and was attended by the Executive Member for Strategic Planning and Transport. The objective of the workshop was “to establish a mechanism for elected members to co-operate across boundaries, including membership, scope, ways of working, key relationships and issues for early consideration”. Progress in relation to this objective will be reported to future Panel meetings.

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

- Non-Key Decision 14/08 – East Herts and Uttlesford Memorandum of Understanding – April 2014
- Duty to Co-Operate Update Report (District Planning Executive Panel, 16 January 2014)
- Duty to Co-Operate Update Report (District Planning Executive Panel, 3rd December 2013)
- Duty to Co-Operate Update Report (District Planning Executive Panel, 25th July 2013)
- ‘The Duty to Co-Operate’ and East Herts District Plan (District Planning Executive Panel, 28th November 2012)

All reports may be accessed at:

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

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

<p>Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):</p>	<p>People – Fair and accessible services for those that use them and opportunities for everyone to contribute</p> <p>This priority focuses on delivering strong services and seeking to enhance the quality of life, health and wellbeing, particularly for those who are vulnerable.</p> <p>Place – Safe and Clean</p> <p>This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p>Prosperity – Improving the economic and social opportunities available to our communities</p> <p>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:	Ongoing in accordance with the duty to cooperate.
Legal:	None identified
Financial:	None identified
Human Resource:	None
Risk Management:	Failure to comply with the Duty to Co-Operate could mean that the Council would not be able to submit the District Plan for Examination in Public.
Health and wellbeing – issues and impacts:	The Duty to Co-Operate applies to Clinical Commissioning Groups and National Health Service Commissioning Boards.

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ESSENTIAL REFERENCE PAPER 'B'

East Herts District Council – Stevenage Borough Council Meeting Notes

Date/time: Monday 24th February 2014, 3pm

Venue: Stevenage Borough Council Offices, Daneshill House, Stevenage

Attendees:

East Herts District Council

Cllr Mike Carver (MC) Executive Member for Strategic Planning and Transport

Bryan Thomsett (BT) Planning Policy Manager

Kay Mead (KM) Senior Planning Officer, Planning Policy

Stevenage Borough Council

Cllr. John Gardner (JG) Deputy Leader and Executive Member for Planning and Regeneration

Peter Bandy (PB) Director of Planning and Regeneration

Paul Pinkney (PP) Head of Planning

Richard Javes (RJ) Planning Policy Manager

Meeting Notes:

1. MC explained that, in accordance with EHC's agreed governance arrangements, such meetings would have agreed meeting notes which will be reported to District Planning Executive Panel (then Executive and Full Council) and become a public document.

Development

2. MC outlined that the Draft District Plan would be subject to a 12 week public consultation commencing 28th February. The document proposes development of around 15,000 dwellings for the period to 2031. The draft Plan includes allocations and three Broad Locations for Development (BL's), which involved two areas (East of Welwyn Garden City and Gilston Area) with Duty to Co-operate implications, and another at North and East of Ware.
3. To recap on the last Duty to Co-operate meeting between the two authorities, MC understood that Stevenage intended to meet its own needs for the period to 2031.
4. It was agreed that a Memorandum of Understanding (MOU) should be produced between the two authorities in due course. This would not necessarily be an agreement of all matters but to state an understanding of the position of both Councils.
5. For Neighbourhood Planning (NP) there will be an open approach for the villages identified in the draft Plan to decide where development should take place within village boundaries. However, if this approach fails to

deliver then the Council will allocate specific sites to meet need. The process has been working well in the district to date with a number of areas showing an interest in developing NPs. The Planning Policy Team holds regular meetings with Town and Parish Councils following each District Planning Executive Panel meeting to brief them on agenda items and progress on the District Plan.

6. The East Herts Plan is a full District Plan which includes allocations and Development Management policies. These have been completely overhauled from the 2007 Adopted Local Plan and have involved Member Workshops as well as input not only from the Planning Policy Team, but also from the Development Management Team.
7. RJ queried whether the development to the North of Harlow would be proposed to meet Harlow's needs. For East of Welwyn Garden City also, whether these BLs would count only towards East Herts Council's housing needs.
8. MC commented that Harlow is primarily interested in the economic benefits that the provision of housing in this location would bring to Harlow rather than housing for housing's sake. It is very much a regeneration issue for the town, relating to Enterprise Zone aspirations, but there are acknowledged infrastructure problems currently.
9. In respect of East of Welwyn Garden City, BT stated that at the moment this is identified as meeting the needs of East Herts. East Herts has a need of around 15,000 dwellings overall, but if all allocated and broad location sites were to fully deliver then there is potential capacity for around 25,000. However, only around 10,000 can be achieved from the proposed allocations, villages, etc, so that around 5,000 dwellings would need to be realised from the BLs. These three locations could all be viable options, and could also offer scope for longer-term planning. However, all have their potential constraints which need addressing and which could result in any delivery being towards the latter part of the Plan.
10. At this stage, the quantum of need from neighbouring authorities is not known and it is not possible to wait while all neighbours prepare their plans. Harlow has produced a paper recently indicating a requirement of around 7,000 dwellings and is looking at aspirational growth of between 12,000 and 15,000 houses with a large emphasis on affordable housing. To date, East Herts has not had any quantified requests from any of its neighbours. The BLs and allocations would accommodate East Herts' needs and more going forward. However, all the BLs are predominantly Green Belt. More work is required to ascertain the full potential numbers. Of the three BLs, East of Welwyn Garden City has the least restrictions, once minerals have been removed. As part of its last consultation, Welwyn Hatfield floated the idea of 400 dwellings from its identified need being provided within East Herts due to identified capacity issues. This was on the basis of providing 400 dwellings per

annum (dpa). However more recent Government and CLG projections have revised this to 800 dpa, which is double what was previously consulted on.

11. Harlow is moving towards a discussion document in the spring regarding its housing figure or range. This will become clearer in due course.
12. JG sought to clarify that the East Herts position in terms of meeting its own need was the placing of developments taking a strategic point of view that these locations could meet the demand and could have expansion potential should a Duty to Co-operate need arise.
13. MC confirmed that this was the case.
14. RJ stated that in respect of Stevenage's hybrid key options consultation, there had not been a lot of response, but the issues raised have caused them to pause. Particular issues concern Stevenage's relationship with North Herts and also North Herts' relationship with Luton and Central Beds.
15. Stevenage is in the situation that North Herts could be contemplating a large amount of housing on the edge of Stevenage. However, if Stevenage publishes its plan in advance of North Herts then they could be found unsound.
16. JG said there were three options under consideration for housing figures but the Inspectorate wanted more evidence of where these numbers had come from in relation to the Housing Market Area (HMA).
17. RJ said that it would not be enough to simply cater for an authority's own needs and that the Inspectorate considers that the HMA as a whole should be catered for. ONS unofficial figures are likely to increase to between 7,000 and 8,000 dwellings. If this is the case then Stevenage will need to look to its neighbours as it will not be able to meet its needs within its boundaries. It may be possible to meet around 5,300 dwellings within Stevenage's boundaries; however, while some landowners are keen to press ahead, some may also withdraw from the process.
18. There is the potential that Stevenage may need to look to North Herts, East Herts or Central Beds to help meet its need. However, Central Beds may be considering locating housing requirement in the A1(M) corridor rather than near Luton. If their capacity proved to be constrained then this may intensify pressure on North Herts and East Herts.
19. Stevenage may therefore be looking to East Herts to meet some of its needs to 2031 and, even if not needed for this timescale, would be looking to East Herts to safeguard land at the East of Stevenage for long-term growth to meet Stevenage's needs.

20. JG raised the issue of affordable housing provision in areas provided outside the borough boundaries and where nomination rights of need generated in Stevenage would reside.
21. MC commented that New Homes Bonus was another similar issue amongst others that need clarification. For the BLs, these will take a long time to be commenced because of infrastructure requirements and a lack of funding streams.
22. BT stated that about 25 years ago new settlements were being proposed around Cambridge, but so far only one had been delivered.
23. RJ said that Stevenage has been talking to the LEP about bringing forward an underpass and other infrastructure to bring forward development West of Stevenage. There was the potential that North Herts could bring forward 5,000 in that location.
24. BT acknowledged the employment issue and stated that, if the Gilston Area were to come forward, it would link with Harlow in terms of rebalancing housing tenure and skills to regenerate Harlow. The critical housing mass would be likely to ensure the use of Harlow's services.
25. MC commented that there was also the potential that this could result in another commuter town that does nothing for Harlow, but would bring issues in relation to London instead. At the EiP there would be a need for a MOU to set the context for longer term growth.
26. Even the Ware BL brings its own difficulties in terms of infrastructure and the need for roads and sewerage provision.
27. KM noted that the effect of this quantum of development on the existing High Street and the town's services also required further in-depth investigation.
28. BT highlighted the education issue, and potential lack of sufficient places, both for this location and elsewhere in the district.
29. MC stated that highways and education were potential major blocks across the whole district and that HCC could become protagonists at the EiP. These two key areas explain the six month delay in bringing forward the draft Plan and the BLs have been identified as we still don't have all the answers in these respects.
30. RJ suggested that East of Stevenage could be an easy option to bring forward early in the plan period because of easy access to Gresley Way.
31. BT stated that 5,000 dwellings featured in the Call for Sites for that location, part of which could link in to other developments in North Herts in that area. However, due to several issues, this area does not feature

in the draft Plan. For the first five to 10 years the allocations would be in place to meet need, but some of these also have issues to be resolved.

32. MC noted that this was especially true for education.
33. RJ commented that Collinswood School is due to be mothballed until it is needed again in the future as there is current lack of demand.
34. RJ then stated that Aston End is not as visible as other parts of the Beane Valley and could meet a lot of objectives. He asked whether East Herts would like to revisit its decision on provision to the East of Stevenage.
35. BT acknowledged RJ's comments but stated that this location had not been brought forward as a strategic location in the draft District Plan for a number of reasons.
36. JG commented that, if it is going to take years to bring forward the BLs, it may be more sensible to bring forward land that is available in other locations such as East of Stevenage, which would save dwarfing market towns such as Ware and destroying their character.
37. BT noted that this location has been evaluated and while, in the long term it may be considered in terms of strategic locations for the next review of the District Plan, it did not feature in the current proposals.
38. JG suggested that a start could be made towards delivery.
39. BT stated that currently it was envisaged that the Gilston area would fulfil the district's longer term need. However, if the BLs were not able to deliver and alternative locations for development were sought then the East of Stevenage area would be likely to be one of those locations considered further. However, while a new settlement could potentially be sought, it would not on its own be likely to be deliverable in the Plan period.
40. MC commented that at this stage the draft District Plan is the preferred strategy, but may be subject to iteration going forward, mainly depending on outcomes of further work on the BLs.
41. PB questioned whether there was pressure from any other neighbour going forward.
42. BT commented that no neighbouring authority had stated an official position in this respect at this time.
43. MC discussed Broxbourne's ambitions to grow its economy and that there were no housing implications for East Herts at this time and that the district serves the borough in terms of the labour market. In respect

of the East Herts economy, the Agri sector was seen as a particular success.

44. JG welcomed the fact that East Herts had produced a draft District Plan document, but queried what the position would be if numbers were to change.
45. MC stated that if this happened and became out of line with what had been calculated so far then a re-evaluation would be needed prior to submission and a MOU to be produced.

Transport

46. RJ referred to the A1(M) consortium.
47. JG stated that both Stevenage and Welwyn Hatfield were pleased that this had commenced and were encouraged by the Highways Agency's new funding regime. However, with funding being spread widely, it was important to devote resources to ensure that pressure is exerted on the Highways Agency to make certain that Hertfordshire gets sufficient funding.
48. RJ noted that the A1(M) Route Based Strategy is currently subject to consultation. The evidence-based Part 1 points to the need for work on the Stevenage related section of the A1(M). It is hoped that increased capital will be identified for improvements between junctions 6 and 8.
49. RJ considered that it might be helpful for East Herts to respond to the consultation, which closes on 5th March. RJ would be happy to forward the main issues which Stevenage has identified. Mott MacDonald has been appointed to update work previously carried out and there are funding possibilities between the Pinch Point and Route Based Strategies. RJ was due to see Jenny Volp (Highways Agency) that week.
50. JG expressed the opinion that a fair amount of traffic using the A602 from various parts of East Herts would ultimately be heading towards the A1(M).

Gypsies and Travellers and Travelling Showpeople

51. BT stated that, in context of the big picture, Gypsies and Travellers and Travelling Showpeople issues were only a small part; however, they were capable of generating a significant response.
52. KM briefed the group on the Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment that was currently being undertaken by consultants and due to conclude by the end of March. This would be shortly followed by a Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study to be finalised by summer this year.

53. BT noted the differences between permanent and transit provision.
54. KM confirmed that both issues were being covered by the Accommodation Needs Assessment.
55. JG considered that it would be helpful if the total capacity in Hertfordshire as a whole were known. This could be compared to the previous RSS policy.
56. RJ commented that, from a Stevenage perspective, David Couttie has completed the traveller element of the SHMA. This has identified a need for five pitches, which are likely to be provided on the existing Dyes Lane site. The HCA own all the land around this site. While HCC are not open to taking on new sites for Gypsies and Travellers, they are likely to continue their responsibility for new pitches on existing sites. The previous representative that Stevenage had been negotiating with at the HCA had been amenable to the expansion of the Dyes Lane site on their land and dialogue has now commenced with that person's replacement to progress the issue.
57. Beyond this provision, there has been a need identified for an additional three to five pitches to be provided every five years. This is beyond the capacity of the Dyes Lane site to accommodate. Therefore a new site will need to be found. When the SNAP initiative was to be progressed it was understood that a site could be identified in that area, but North Herts had indicated that this would need to meet the needs of that authority too. However, the current North Herts position appears to be that their needs could be met at the existing site at Codicote another site elsewhere in the district, to the need to identify a new site would no longer apply. Therefore, Stevenage would need to look elsewhere.
58. RJ confirmed that there were no Travelling Showpeople's sites in Stevenage.

Technical Evidence

59. BT stated that in terms of employment, the Council had obtained strategic and economic advice around HMAs and journey to work areas. Apart from GSK in Ware, East Herts' strength lies in SMEs and rural RDPEs etc.
60. MC commented that, following the successful spending of all grant allocations over a five year period, the LEP was happy to support East Herts Council as the lead for economic strategy in rural areas.
61. BT noted that Bishop's Stortford is the main market town, but the district has a large commuter role by providing workers that can afford to live in East Herts with movement out to London and other locations.
62. MC detailed that the Charringtons site in Bishop's Stortford was now clear of Judicial Review and will be the focus of redevelopment as a

commercial centre for the town centre along with the Goods Yard site and the waterfront.

63. BT commented that the Goods Yard is a large brownfield site and that a consortium of Network Rail and Kier Property, known as Solum, have been responsible for bringing forward similar sites elsewhere, concentrating firstly in London and working their way outwards.
64. MC stated that the bringing forward of the site depends on the new franchisee to be appointed and the relationship of the development with Bishop's Stortford station. It will be important to ensure good sustainable links with other modes of transport beyond rail and that the town centre should retain its character while increasing business presence in Bishop's Stortford.
65. BT noted that Bishop's Stortford has a strong relationship with many satellite towns around it.
66. MC discussed, in terms of evidence base, that advice is being sought on the retail side of the town centres to ascertain what the district's High Streets are likely to look like in 20 years time and to make sure that they are fit for purpose in respect of providing necessary goods and services for their populations.

Neighbourhood Planning

67. BT detailed that Neighbourhood Planning is proving popular in East Herts with progress being made in several settlements. Bishop's Stortford is currently consulting on a draft Neighbourhood Plan to cover two wards of the town.
68. Ware has not yet declared whether or not it will bring forward its own document or whether work on the BL DPD could encompass the whole of the town as many of the issues could be duplicated.
69. MC noted that, for Hertford, the future of Bircherley Green and the economic viability of the area going forward would be a key issue. Sawbridgeworth has been awaiting the publication of the draft District Plan prior to developing its own document. Buntingford had prepared a draft Plan favouring development to the north and south of the town, but the pre-emptive applications and subsequent appeal decisions to the east of the town had resulted in permissions outside of that scope.

Other

70. The meeting concluded with all concurring that there was a need to agree a MOU in due course to progress both authorities' plans. A further meeting would be held in due course to discuss this issue.

As of 6th October 2014, Stevenage Borough Council had not responded to requests for comment on the meeting notes, but had been made aware that they are being made public.

East Herts District Council – Welwyn Hatfield Borough Council
To discuss land east of Welwyn Garden City
Meeting Notes

Date: 17th July 2014

Venue: East Herts Council Offices, Hertford

Attendees:

East Herts District Council

Cllr Mike Carver – Executive Member for Strategic Planning and Transport

Jenny Pierce – Senior Planning Officer

Martin Paine – Senior Planning Officer

Welwyn Hatfield Borough Council

Cllr Roger Trigg – Executive Member for Planning, Housing, and Community

Colin Haigh – Head of Planning

Sue Tiley – Planning Policy and Implementation Manager

Context

A variety of sites have been promoted for development to the east and south of Welwyn Garden City on land that lies within both Welwyn Hatfield Borough Council and East Herts District Council administrative areas. A joint masterplan approach is considered to be the most appropriate way of appraising and, if favoured, allocating and releasing the land from the green belt in respective local plans.

Meeting Notes

1. East Herts Council's Preferred Options consultation closed in May. Representations from Welwyn Hatfield had been received and would be considered. A further Regulation 18 consultation was proposed later in the year which would address any material amendments to the District Plan prior to submission (Regulation 19).
2. Welwyn Hatfield would be undertaking a Regulation 18 consultation on a new Local Plan containing significant changes to strategic policies, site allocations and a list of development management policies, probably for 9 weeks over the Christmas period.

Policy Approach

3. CH/ST suggested that some form of co-ordinated approach would be needed, although whether a separate DPD was the most suitable vehicle would need to be considered further. One consideration was the need to satisfy national requirements in terms of the five year housing land supply, and this would need to be kept under review. MC stated that he didn't have any objections to a co-ordinated policy approach.

4. MP explained that one of the main reasons for proposing a DPD rather than an allocation was the concerns raised by the County Council as Local Highways Authority about the A414 capacity. However if it was possible to resolve these concerns then it should be possible to allocate the land, given the firm Green Belt boundaries, subject to a co-ordinated approach to masterplanning by both landowners.
5. It was agreed that there would be close co-operation around the drafting of policies for the area, in the event that further testing suggested that development was deliverable.

Viability/Infrastructure Planning Work

6. MC stated that East Herts Council wanted to ensure that the necessary infrastructure would be provided to support growth. He would not want to take forward a plan which was not deliverable.
7. MP explained that East Herts Council would be commissioning consultants to undertake work on a Delivery Study, which would include viability and infrastructure planning tasks, and would be likely to address cross-boundary issues including in the A414 corridor.
8. ST explained that BNP Paribas were undertaking viability work for Welwyn Hatfield Council and it would be sensible for the consultants for both authorities to discuss viability issues of a cross-boundary nature.

Cross-boundary housing issues

9. ST explained that a new SHMA was being prepared which was likely to suggest new housing market area boundaries. Whilst Welwyn Hatfield had previously sought 450 dwellings in East Herts, this would need to be kept under review. CH suggested that Housing Market Areas should be used as a guideline with some flexibility as a starting point for discussions.
10. It was agreed that, should development south and east of the town be deliverable, then it would be necessary to discuss how this would be apportioned between the local planning authorities. Based on the way the Planning Inspectorate was interpreting this in the context of the Duty to Co-Operate, the most likely scenario would be agreement to share the housing numbers. Further discussions on this would be required.

Site Promoters

11. The concerns of both Councils were discussed in respect of the apparent lack of joint working between Lafarge and Gascoyne Cecil as

the two landowners for the site. The Lafarge proposals did not appear to take account of the Gascoyne Cecil land. ST understands that Gascoyne Cecil had concerns about the proposed masterplan by Lafarge.

ACTION: joint meeting with both Local Planning Authorities and both site promoters to be arranged.

Memorandum of Understanding

12. There was some discussion of the need for a formal Memorandum of Understanding between the authorities, in the context of the Duty to Co-Operate. It was discussed that the Hertfordshire MoU was too general in nature and a specific MoU between the two authorities would be needed.
13. The MoU would need to be agreed by the Full Council of both East Herts Council and Welwyn Hatfield District Council.

ACTION: JP to draft initial MoU for circulation and agreement to take forward.

The meeting ended at 11.30.

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Co-operation for Sustainable Development Group - Terms of Reference

Objective:

To achieve effective co-operation between Councils to support Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London boroughs..

How will this be achieved?:

This objective will be achieved by providing a forum across the county boundaries of Essex and Hertfordshire and Greater London for officers of participant councils to develop a shared understanding of community issues, to jointly review the options to achieve the needs of those communities, including growth, and to identify how they should co-operate to enable those needs to be met.

Notes

This group does not have any decision making powers, and is an informal group that will make recommendations to the constituent Councils when appropriate, and to any cross boundary grouping of elected members which has similar purposes. The group commits to working together to achieve sustainable development in the recognition that agreement between all relevant parties will not always be possible.

This group should not be construed as the only forum in which such cross-boundary discussions will take place where more than two District Council areas are affected. It is expected that participants will continue to hold separate or detailed discussions on cross boundary issues which affect only two, or a small number of, district Council areas on a bilateral basis or through county bodies such as HPOG and EPOA as they so determine.

Initial identification of cross boundary issues for discussion arise from the NPPF, NPPG and from the PAS workshop but are expected to change as new issues arise.

Chairmanship of the Group will be held by a Chief Executive or Director of one of the participant Councils to support linkages to Chief Executives and Councillors, and will rotate annually.

The chairing Council will be responsible for developing agendas after consultation with the members of the Group, distributing papers for meetings and for taking and circulating any notes of meetings.

As this is an informal group which makes recommendations to the constituent Councils the papers and notes of meetings will not be made public until agreed by all member authorities.

It is anticipated that meetings will be held approximately monthly, at least initially, and the location of the meetings will rotate around the participating councils.

30 July 2014.

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 22 OCTOBER 2014 EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

EAST HERTS RESIDENT SURVEY ON THE DRAFT DISTRICT PLAN, JULY 2014

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

- This report presents the findings of the East Herts Resident Survey on the Draft District Plan Preferred Options undertaken between 22nd May and 8th June 2014.

<u>RECOMMENDATIONS FOR DISTRICT PLANNING EXECUTIVE</u> <u>PANEL AND EXECUTIVE: That:</u>	
(A)	the East Herts Resident Survey July 2014, on the Draft District Plan Preferred Options, be supported as part of the evidence base to inform the East Herts District Plan.
<u>RECOMMENDATIONS FOR COUNCIL: That:</u>	
(A)	The East Herts Resident Survey July 2014, on the Draft District Plan Preferred Options, be agreed as part of the evidence base to inform the East Herts District Plan.

1.0 Background

1.1 In April this year the Council commissioned Opinion Research Service (ORS) to undertake a telephone survey of a sample of residents across the District. The survey had two purposes: to seek resident's opinions on the approach to development in their local area and the wider district, using a representative sample of residents in terms of their age, gender and whether they live in urban or rural areas for example; and to act as a sense check on the responses received to the Draft District Plan Consultation.

1.2 The Survey captured a sample of 502 residents through a telephone survey of 22 questions plus 9 control questions, with each interview lasting between 10 and fifteen minutes. The Survey Interview is attached at **Essential Reference Paper 'B'**. Telephone numbers were attained using a random number generator computer programme, which uses postcode sectors as a basis. Responses were analysed and the Survey Report attached at **Essential Reference Paper 'C'** was produced.

2.0 Report

2.1 The Survey Report consists of 3 sections, together with a fourth which simply provides a list of tables and figures. Section 1 contains the project overview and explains the issue of statistical significance. Tables 1 to 4 summarise the demographic data of the resident sample; by age, gender, employment status and urban/rural split.

2.2 Section 2 contains an Executive Summary of the main findings of the Survey, selectively highlighting some key issues.

2.3 Section 3 presents the results of the Survey, using graphics and tables to illustrate responses.

2.4 The Report highlights key trends and anomalies and makes factual statements with regards to the statistics gathered. The Report is complimented by a web-based database which is available to Officers. This database is structured in such a way that every question can be analysed in minute detail. For example, the responses can be broken down by the age of the respondent, their gender, their working status, whether they live in a town or rural area and even by their ethnicity (if provided).

2.5 It should be noted that the Survey captured only a sample of residents and as such, all results are subject to sampling tolerances, which means that not all differences are necessarily statistically significant. Where differences between demographic groups have been highlighted as significant (i.e. where the differences between demographic groups are shaded red or green), there is a 95% probability (unless otherwise stated) that the difference is significant and not due to chance. Where the percentages do not sum to 100, this may be due to rounding, the exclusion of 'don't know' categories, or multiple answers.

- 2.6 One of the purposes of the Survey was to act as a sense check of the responses received through the public consultation on the Draft District Plan. The results show that there are differing opinions on whether there is a housing need in the district and the preferred approach to deal with this need, particularly depending upon age and where people live.
- 2.7 When asked about which kind of housing they think is important, 94% considered housing for first time buyers, 93% thought housing for people with disabilities and 92% housing for young families with children. 66% of residents thought that the provision of larger homes (5 bedrooms plus) was unimportant.
- 2.8 When asked about housing for first time buyers, residents in full time education at school, college or university, and female respondents were more likely than average to say that this type of housing is important. Residents aged 65 and over and those wholly retired from work also considered this type of housing as important. Interestingly, those aged between 25 and 34 were more likely than average to say that housing for older people was important, while those aged between 55 and 64 were less likely than average to say that this type of housing was important.
- 2.9 When asked about their opinion on the redevelopment or retention of employment land, 91% agreed that they would support the redevelopment of existing employment land provided that this was to alternative uses that would provide employment opportunities, but less (55%) agreed that they would support such redevelopment to non-employment uses such as housing. 84% agreed that they would support the retention of employment land if improvements were made to their quality and if new employment land was created in appropriate locations (80%).
- 2.10 It appears that on the face of it the results confirm the types of opinions expressed through the Draft District Plan consultation. However, one key message that can be derived is that there is no consensus of opinion and the survey could be used to form an argument both for and against development. However, there are positive messages about the preferred approach to development in terms of location, the type of development in terms of housing type and the approach to employment land.
- 2.11 Members are therefore requested to support the recommendations at the head of this report that the East Herts

Resident Survey is used to inform 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

None

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

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

Report Author: Jenny Pierce – Senior Planning Policy Officer
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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):	<p>People – Fair and accessible services for those that use them and opportunities for everyone to contribute</p> <p>This priority focuses on delivering strong services and seeking to enhance the quality of life, health and wellbeing, particularly for those who are vulnerable.</p> <p>Place – Safe and Clean</p> <p>This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p>Prosperity – Improving the economic and social opportunities available to our communities</p> <p>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:	The Residents Survey was a form of public consultation.
Legal:	There are no legal implications as a result of this Survey.
Financial:	There are no direct financial implications of this Survey other than the cost of its completion.
Human Resource:	None other than that related to project management requirements during the preparation of the interview and the analysis and reporting of the Survey.
Risk Management:	None
Health and wellbeing – issues and impacts:	The results of the Residents Survey will inform the preparation of the District Plan, which contains policies which have objectives to improve health and wellbeing through positive Planning.

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5016 East Herts Consultation on District Plan

SECTION A: INTRO, CALL AND QUOTA MANAGEMENT

Good {PeriodOfDay}. **IF NAMED MOBILE SAMPLE:** Please may I speak with 'named respondent'?

My name's {Operator:FirstName} {Operator: LastName} and I'm calling from Opinion Research Services on behalf of East Herts Council.

The Council has asked us to talk to local residents about future development in the area to help them get an understanding of a cross-section of resident's attitudes.

IF RDD: At the moment we are finding it difficult to speak to men under the age of 55 and all people under the age of 35. Is there anyone in the house of that age?

All survey results will be anonymous and your contact details will never be released to any other parties.

If necessary: The interview should take around 10 minutes to complete and everything you say will be treated in confidence. If you would like to confirm my identity, I can supply you with a contact name and telephone number for Opinion Research Services, the Market Research Society or East Herts Council at any time.

I also need to point out that this conversation may be monitored or recorded for training and quality purposes only.

If necessary (if respondent asks for further information about the consultation: you can find out about the consultation and proposals at the Council's website: www.eastherts.gov.uk/districtplan

INTERVIEWER: PROVIDE AS NECESSARY

ORS TEAM CONTACT DETAILS: 0800 107 7890 or info@ors.org.uk

If someone specifically wants to speak to a named East Herts Council officer: **Jenny Pierce, Planning Policy on 01992 531624**

MRS Freephone Number: 0500 39 69 99

IF RDD:

INTERVIEWER IF NECESSARY (i.e. if respondent asks how their details were obtained): Your number was selected at random from a list of numbers in East Herts to conduct this research. Your contact details will at no time be released to any other parties and will only be used in connection with this survey.

IF MOBILE SAMPLE:

INTERVIEWER IF NECESSARY (i.e. if respondent asks how their details were obtained): Your number was selected from a list of commercially available numbers. Your contact details will at no time be released to any other parties and will only be used in connection with this survey.

S1

Can I confirm you are aged 16 or over?

- Yes – to S2 1
- No – To Display below (TERMINATE INTERVIEW) 2

I’m sorry you have to be 16 or over to take part in this interview, unfortunately I’m not allowed to continue.

Thank you for your time anyway and sorry to have disturbed you.

INTERVIEWER - TERMINATE THE CALL

S2

Before we begin, I need to ask, are you speaking on a mobile phone?

- Yes – to S3 1
- No – continue to A1 2

S3 ASK ONLY IF S2 = Yes (i.e. respondent speaking on Mobile)

Are you currently driving?

- Yes – To Display below (CLOSE INTERVIEW) 1
- No – continue to A1 2

Can I please book an appointment to call you back at a more convenient time to carry out this interview?

(Market Research Society guidelines prevent us interviewing people whilst driving - even if they have hands free kit and are willing to participate, you must not continue the interview)

INTERVIEWER - DO NOT PRESS NEXT - BOOK APPOINTMENT AND ABANDON INTERVIEW

A1 (ASK ALL) [CORE]

What is your FULL postcode?

INTERVIEWER IF NECESSARY: This will enable your responses to be mapped to your local area for attention but you will NOT be identified in the analysis.

INTERVIEWER: The postcode you enter below will be checked against a list of valid entries and a display will appear if the code given is invalid or if the quota for the area has been reached (otherwise the survey will continue)

- Freetext - Record word for word
- Refused – go to DISPLAY1 and TERMINATE INTERVIEW 98

IF REFUSED: DISPLAY 1

Unfortunately, without a postcode, I cannot continue with the interview.

INTERVIEWER: If the respondent changes their mind at this point MOVE BACK to POSTCODE question to enter details.

Thank you for your time anyway and sorry to have disturbed you.

INTERVIEWER - TERMINATE INTERVIEW

IF INVALID: DISPLAY 2

Unfortunately, I can only interview people who are currently living in East Herts. Our system shows you to be outside of this area so I am unable to continue.

Thank you for your time anyway and sorry to have disturbed you.

INTERVIEWER - TERMINATE INTERVIEW

IF QUOTA FAIL: DISPLAY 3

Sorry, I'm afraid I cannot continue this interview with you as we have already interviewed the required number of people in this area.

INTERVIEWER IF NECESSARY: To ensure we interview a representative cross section of residents across the whole of East Herts, we have limits on the number of people we can interview in each area

Thank you for your time anyway and sorry to have disturbed you.

INTERVIEWER - TERMINATE INTERVIEW

Firstly, can I ask you some questions about you to make sure that we talk to a representative cross-section of people?

A2a (ASK ALL) [CORE]

What was your age on your last birthday?

Freetext - Record age in years

Refused – go to A2b 98

A2b (ASK IF A2a = {RF}) [CORE]

Please could you tell me which age band you are in?

INTERVIEWER: Read out options

- Group 1:* Aged 16 to 17 1
- Group 1:* Aged 18 to 24 2
- Group 2:* Aged 25 to 34 3
- Group 3:* Aged 35 to 44 4
- Group 3:* Aged 45 to 54 5

Group 4: Aged 55 to 64	<input type="checkbox"/>	6
Group 4: Aged 65 to 74	<input type="checkbox"/>	7
Group 4: Aged 75 or over	<input type="checkbox"/>	8
Refused – go to DISPLAY 4 then TERMINATE INTERVIEW	<input type="checkbox"/>	98

IF REFUSED: DISPLAY 4

I am afraid that because we need to ensure that we survey the views of a cross-section of people, I am unable to continue with the interview without knowing your age.

INTERVIEWER: If the respondent changes their mind at this point MOVE BACK to AGE question to enter details.

Thank you for your time anyway and sorry to have disturbed you.

INTERVIEWER - TERMINATE INTERVIEW

A3 (ASK ALL) [CORE]

INTERVIEWER: Do not ask question aloud

Gender?

Male	<input type="checkbox"/>	1
Female	<input type="checkbox"/>	2

A4 (ASK ALL) [CORE]

Are you currently employed, self-employed, retired or otherwise not in paid work?

INTERVIEWER: Clarify answer by reading nearest response option and probing (if necessary)

An employee in a full time job (31 hours or more per week)	<input type="checkbox"/>	1
An employee in a part time job (Less than 31 hours per week)	<input type="checkbox"/>	2
Self- Employed (full or part- time)	<input type="checkbox"/>	3
On a Government supported training programme (e.g 'Modern Apprenticeship' or 'Training for Work')	<input type="checkbox"/>	4
In full time education at school, college or university	<input type="checkbox"/>	5
Unemployed and available for work	<input type="checkbox"/>	6
Permanently sick or disabled	<input type="checkbox"/>	7
Wholly retired from work	<input type="checkbox"/>	8
Looking after the home	<input type="checkbox"/>	9
Doing something else (please specify)	<input type="checkbox"/>	10
Refused – go to DISPLAY 5 then TERMINATE INTERVIEW	<input type="checkbox"/>	98

IF REFUSED: DISPLAY 5

I am afraid that because we need to ensure that we survey the views of a cross-section of people, I am unable to continue with the interview without knowing your working status.

INTERVIEWER: If the respondent changes their mind at this point MOVE BACK to WORKING STATUS question to enter details.

Thank you for your time anyway and sorry to have disturbed you.

INTERVIEWER - TERMINATE INTERVIEW

A5 (ASK ALL)

What is your ethnic group?

Are you Asian, Black, Chinese, of a mixed background, White, or of another ethnic group?

And is that...?

INTERVIEWER: Read from list below as appropriate

- | | | |
|---|--------------------------|----|
| <i>White</i> Welsh/ English/ Scottish/ Northern Irish/ British | <input type="checkbox"/> | 1 |
| <i>White</i> Irish | <input type="checkbox"/> | 2 |
| <i>White</i> Gypsy or Irish Traveller | <input type="checkbox"/> | 3 |
| <i>White</i> Any other White background | <input type="checkbox"/> | 4 |
| <i>Mixed or Multiple ethnic groups</i> White and Black Caribbean | <input type="checkbox"/> | 5 |
| <i>Mixed or Multiple ethnic groups</i> White and Black African | <input type="checkbox"/> | 6 |
| <i>Mixed or Multiple ethnic groups</i> White and Asian | <input type="checkbox"/> | 7 |
| <i>Mixed or Multiple ethnic groups</i> Any other mixed/Multiple ethnic background | <input type="checkbox"/> | 8 |
| <i>Asian or Asian British</i> Indian | <input type="checkbox"/> | 9 |
| <i>Asian or Asian British</i> Pakistani | <input type="checkbox"/> | 10 |
| <i>Asian or Asian British</i> Bangladeshi | <input type="checkbox"/> | 11 |
| <i>Asian or Asian British</i> Chinese | <input type="checkbox"/> | 12 |
| <i>Asian or Asian British</i> Any other Asian background | <input type="checkbox"/> | 13 |
| <i>Black/African/Caribbean/Black British</i> African | <input type="checkbox"/> | 14 |
| <i>Black/African/Caribbean/Black British</i> Caribbean | <input type="checkbox"/> | 15 |
| <i>Black/African/Caribbean/Black British</i> Any other Black/African/Caribbean background | <input type="checkbox"/> | 16 |
| <i>Other ethnic group</i> Arab | <input type="checkbox"/> | 17 |
| <i>Other ethnic group</i> Other | <input type="checkbox"/> | 18 |
| Refused | <input type="checkbox"/> | 98 |

One of East Herts council's responsibilities is to ensure sufficient housing for all residents across the district. The council is currently developing a District Plan that sets out its preferred development strategy from now until 2031. The findings from this survey will be reported to the Council's Planning Executive and will be used to inform the next draft of the District Plan.

Throughout this survey we ask you to think about your 'local area'. When answering please consider your local area to be the area within about 15-20 minutes walking distance from your home.

Q1 (ASK ALL)

To what extent do you agree or disagree that there is a high level of housing need in your local area?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

The Council has a duty to make all efforts to meet the projected housing needs of the District, for example by identifying suitable development land and encouraging developers to make adequate provision for certain types of homes. Evidence indicates that the Council needs to plan for the creation of 15,000 additional homes between 2011 and 2031.

For each of the following statements, can you please tell me if you:

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree

Q2a (ASK ALL)

To what extent do you agree or disagree that you would support development on Brownfield sites (that is sites that have been previously developed) within the towns in the local area?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2b (ASK ALL)

To what extent do you agree or disagree that.... you would support some development on the edges of towns and villages, provided that it was accompanied by the necessary supporting infrastructure such as roads, utilities, schools and community facilities?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2c (ASK ALL)

To what extent do you agree or disagree that.... you would support some development on the edges of the towns and villages, provided that it doesn't have a significant impact on sensitive landscapes and wildlife sites?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

If necessary explain that sensitive landscapes could include open or unchanged landscapes, those with historic value and wildlife sites

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2d (ASK ALL)

To what extent do you agree or disagree that.... you would support some development on the edges of the towns and villages even if there were some impact on sensitive landscapes and wildlife sites, if necessary to meet local housing needs?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

If necessary explain that sensitive landscapes could include open or unchanged landscapes, those with historic value and wildlife sites

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2e (ASK ALL)

To what extent do you agree or disagree that.... you would support some development on the edges of towns and villages even if this results in changes to the Green Belt?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Interviewer if necessary explain that: The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Changes to the green belt would mean amended boundaries and the subsequent removal of land from the Green Belt around settlements.

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2f (ASK ALL)

To what extent do you agree or disagree that.... you would want development to be limited to brownfield sites only, even if that meant that housing needs would not be met?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Interviewer if necessary explain that a brownfield site is a site that has been previously developed

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2g (ASK ALL)

To what extent do you agree or disagree that.... you think there is very limited capacity in your local area to meet housing needs and therefore housing needs should be met elsewhere in East Herts?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2h (ASK ALL)

To what extent do you agree or disagree that.... you think there is limited capacity within East Herts district to meet housing needs and therefore housing needs should be met in other districts?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2i (ASK ALL)

To what extent do you agree or disagree that.... you think where there is very limited capacity to meet housing needs in other nearby districts, these needs should be met in East Herts?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2j (ASK ALL)

To what extent do you agree or disagree that.... housing development should be focused in areas that have the best access to a wide range of employment opportunities?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q2k (ASK ALL)

To what extent do you agree or disagree that... you would support the development of a new settlement, such as a small new town or garden city, provided that it was accompanied by the necessary supporting infrastructure?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Interviewer if necessary explain that infrastructure could include roads, utilities, schools and community facilities

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

East Herts Council can require developments to make provision for different types of housing for example for first time buyers, families, older people and those with particular needs.

For each of the following types of housing, can you please tell me if you think they are:

- Very important
- Fairly important
- Neither important nor unimportant
- Fairly unimportant
- Not important at all

Q3a (ASK ALL)

How important or unimportant is... housing for first time buyers?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between very/fairly important and fairly unimportant/not important at all

Very important

Fairly important

Neither important nor unimportant

Fairly unimportant

Not important at all

Don't know

Refused

Q3b (ASK ALL)

How important or unimportant is... Housing for young families with children?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between very/fairly important and fairly unimportant/not important at all

Very important

Fairly important

Neither important nor unimportant

Fairly unimportant

Not important at all

Don't know

Refused

Q3c (ASK ALL)

How important or unimportant is... Larger homes (5 bedrooms plus)?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between very/fairly important and fairly unimportant/not important at all

Very important

Fairly important

Neither important nor unimportant

Fairly unimportant

Not important at all

Don't know

Refused

Q3d (ASK ALL)

How important or unimportant is... Housing for older people?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between very/fairly important and fairly unimportant/not important at all

Very important

Fairly important

Neither important nor unimportant

Fairly unimportant

Not important at all

Don't know

Refused

Q3e (ASK ALL)

How important or unimportant is... Housing for people with disabilities?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between very/fairly important and fairly unimportant/not important at all

Very important

Fairly important

Neither important nor unimportant

Fairly unimportant

Not important at all

Don't know

Refused

Now thinking about 'employment land', by which I mean land such as industrial estates or business parks, can you please tell me if you:

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree

....for each of the following statements.

Q4a (ASK ALL)

To what extent do you agree or disagree that you would support the retention of existing employment land regardless of its condition?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q4b (ASK ALL)

To what extent do you agree or disagree that.... you would support the retention of existing employment land provided improvements were made to their quality?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q4c (ASK ALL)

To what extent do you agree or disagree that.... you would support the redevelopment of existing employment land provided this was to alternative uses that would provide employment opportunities?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q4d (ASK ALL)

To what extent do you agree or disagree that.... you would support the redevelopment of existing employment land even if this was for non-employment uses such as housing?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Q4e (ASK ALL)

To what extent do you agree or disagree that... you would support the creation of new employment land in appropriate locations?

Interviewer: Read out options except 'don't know' and 'refused'. If necessary clarify between strongly and tend to

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Refused

Thank you very much for your help and time completing this interview.

Q5 (ASK ALL)

Finally, just to let you know that you may be contacted for quality control purposes or in the event of us wanting to speak to you very briefly again in relation to this survey only. Would we be able to contact you?

INTERVIEWER: Please explain if necessary that they will not necessarily be contacted again. It will only be in the case of us wanting to ask an additional question for the survey or for verifying something they've said for quality control purposes.

Yes	<input type="checkbox"/>	1
No	<input type="checkbox"/>	2
Refused	<input type="checkbox"/>	98

Thank you very much once again.

Further revisions to the District Plan will be available on the Council's website

www.eastherts.gov.uk/districtplan

To repeat: This survey has been conducted by Opinion Research Services. We are a member of the Market Research Society and are registered under the Data Protection Act. All survey results will be anonymous and your contact details will never be released to any other parties.

If you have any queries regarding the survey or our company, I can supply you with contact details.

INTERVIEWER: PROVIDE AS NECESSARY

ORS TEAM CONTACT DETAILS: 0800 107 7890 or info@ors.org.uk

If someone specifically wants to speak to a named East Herts Council Officer: [Jenny Pierce, Planning Policy on 01992 531624](#)

MRS Freephone Number - 0500 39 69 99

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East Herts Council District Plan Consultation 2014

July 2014

Opinion Research Services

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As with all our studies, findings from this survey are subject to Opinion Research Services Standard Terms and Conditions of Contract

Any press release or publication of the findings of this survey requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation

This study was conducted in accordance with ISO 20252:2012

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1. Project Overview

The Survey

- 1.1 Opinion Research Services (ORS) was commissioned by East Herts District Council (EHDC) to undertake a telephone survey of residents in the East Herts area. The aim of the survey was to get an understanding of a cross-section of resident's attitudes about future development in the area.
- 1.2 The questionnaire was designed collaboratively between ORS and East Herts District Council. The telephone interviews were carried out between 22nd May and 8th June 2014. A total of 502 telephone interviews were conducted during this period with a randomly selected sample of residents of East Herts.

Interpretation of the Data

- 1.3 It should be remembered that a sample, and not the entire population of the District, has been interviewed. In consequence, all results are subject to sampling tolerances, which means that not all differences are necessarily statistically significant.
- 1.4 Where differences between demographic groups have been highlighted as significant (i.e. where the differences between demographic groups are shaded red or green), there is a 95% probability (unless otherwise stated) that the difference is significant and not due to chance.
- 1.5 Returned sample was checked against comparative data for gender, age, working status, ethnicity and whether the respondent lives in an urban or rural area, then subsequently weighted by age. The results presented here are therefore representative of East Hertfordshire.
- 1.6 Please note that where percentages do not sum to 100, this may be due to rounding, the exclusion of 'don't know' categories, or multiple answers.
- 1.7 The tables on the following pages show the profile characteristics of respondents to the survey. Any value denoted by a * represents a percentage which is less than 1%.

Table 1: Age band

Please could you tell me which age band you are in?	Number of respondents (unweighted count)	% of respondents (unweighted valid)	% of respondents (weighted valid)
Aged 16 to 17	9	2	2
Aged 18 to 24	50	10	10
Aged 25 to 34	68	14	15
Aged 35 to 44	68	14	20
Aged 45 to 54	126	25	20
Aged 55 to 64	76	15	15
Aged 65 to 74	65	13	10
Aged 75 or over	40	8	9
Total	502	100	100

Table 2: Gender

Gender	Number of respondents (unweighted count)	% of respondents (unweighted valid)	% of respondents (weighted valid)
Male	243	48	47
Female	259	52	53
Total	502	100	100

Table 3: Employment status

Are you currently employed, self-employed, retired or otherwise not in paid work?	Number of respondents (unweighted count)	% of respondents (unweighted valid)	% of respondents (weighted valid)
An employee in a full time job (31 hours or more per week)	204	41	40
An employee in a part time job (Less than 31 hours per week)	77	15	17
Self-employed (full or part-time)	58	12	11
In full time education at school, college or university	22	4	5
Unemployed and available for work	16	3	4
Permanently sick or disabled	3	1	1
Wholly retired from work	100	20	19
Looking after the home	19	4	4
Doing something else	3	1	1
Total	502	100	100

Table 4: Urban/rural split

Urban/Rural	Number of respondents (unweighted count)	% of respondents (unweighted valid)	% of respondents (weighted valid)
Urban	342	68	68
Rural	160	32	32
Total	502	100	100

Graphics

^{1.8} Graphics are used extensively in this report to make it as user-friendly as possible. The pie charts and other graphics show the proportions (percentages) of residents making relevant responses. Where possible the colours used in the charts have been standardised with a ‘traffic light’ system in which:

- Green shades represent positive responses
- Beige and purple represent neither positive nor negative responses
- Red shades represent negative responses
- The bolder shades are used to highlight responses at the ‘extremes’ – for example, very satisfied or very dissatisfied.

Acknowledgements

^{1.9} ORS would like to thank Jenny Pierce at East Herts Council for her help and assistance in developing the survey. We would also like to thank the 502 residents who took part in the survey, without whose valuable input the research would not have been possible.

2. Executive Summary

Summary of Main Findings

2.1 The following paragraphs selectively highlight some key issues, but readers are referred to the detailed graphics for the full story. The suite of ORS reports also includes full cross tabulations.

East Herts District Plan

2.2 Similar proportions of residents *agreed* (41%) and *disagreed* (44%) that there is a high level of housing need in their local area.

2.3 Around four fifths or more of residents *agreed* that *housing development should be focused in areas that have the best access to a wide range of employment opportunities* (88%) and that they would *support some development on the edges of the towns and villages, provided that it doesn't have a significant impact on sensitive landscapes and wildlife sites* (78%).

2.4 More than 7 in 10 residents also *agreed* that they would support: *the development of a new settlement, such as a small new town or garden city, provided that it was accompanied by the necessary supporting infrastructure* (73%) as well as *the development on Brownfield sites within the towns in the local area* (73%). 71% of residents also *agreed* that *there is very limited capacity in their local area to meet housing needs and therefore housing needs should be met elsewhere in East Herts*.

2.5 Just under four fifths of residents *disagreed* that they would *support some development on the edges of towns and villages even if this results in changes to the Green Belt* (78%). More than three quarters also *disagreed* that they would *support some development on the edges of the towns and villages even if there were some impact on sensitive landscapes and wildlife sites, if necessary to meet local housing needs* (76%).

2.6 More than nine in ten residents considered *housing for first time buyers* (94%), *housing for people with disabilities* (93%) and *housing for young families with children* (92%) to be *important*. More than four fifths of residents (86%) also thought that *housing for older people* is *important*. Two thirds (66%) of residents thought that *larger homes* (5 bedrooms plus) are *unimportant*.

2.7 Just over nine in ten residents (91%) *agreed* that they would support the *redevelopment of existing employment land provided this was to alternative uses that would provide employment opportunities*.

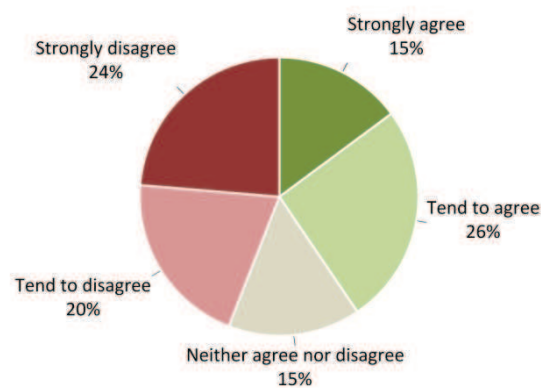
2.8 Four fifths or more of residents also *agreed* that they would *support the retention of existing employment land provided improvements were made to their quality* (84%) and that they would *support the creation of new employment land in appropriate locations* (80%).

3. East Herts District Plan Results

- 3.1 Similar proportions of residents *agreed* (41%) and *disagreed* (44%) that there is a high level of housing need in their local area.
- 3.2 Residents aged 65 and over were significantly less likely to *agree* with this statement.

Figure 1: To what extent do you agree or disagree that there is a high level of housing need in your local area?

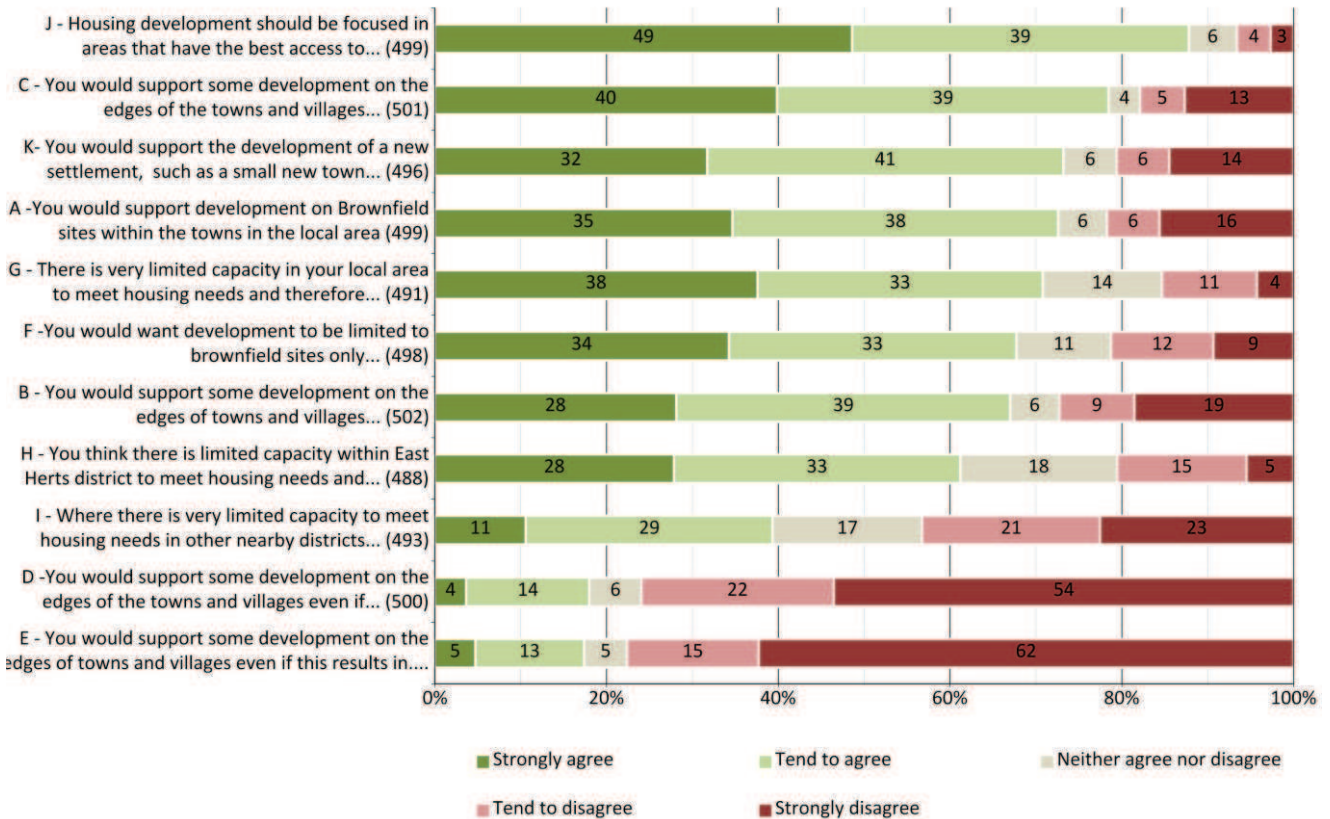
Base: All Respondents (495)



- 3.3 Around four fifths or more of residents *agreed* that *housing development should be focused in areas that have the best access to a wide range of employment opportunities* (88%) and that they would *support some development on the edges of the towns and villages, provided that it doesn't have a significant impact on sensitive landscapes and wildlife sites* (78%).
- 3.4 More than 7 in 10 residents also *agreed* that they would support: *the development of a new settlement, such as a small new town or garden city, provided that it was accompanied by the necessary supporting infrastructure* (73%) as well as *the development on Brownfield sites within the towns in the local area* (73%). 71% of residents also *agreed* that *there is very limited capacity in their local area to meet housing needs and therefore housing needs should be met elsewhere in East Herts*.
- 3.5 Around two fifths of residents (39%) *agreed* that *where there is very limited capacity to meet housing needs in other nearby districts, these needs should be met in East Herts*. However, a similar proportion of residents *disagreed* with this (43%).
- 3.6 Just under four fifths of residents *disagreed* that they would *support some development on the edges of towns and villages even if this results in changes to the Green Belt* (78%). More than three quarters also *disagreed* that they would *support some development on the edges of the towns and villages even if*

there were some impact on sensitive landscapes and wildlife sites, if necessary to meet local housing needs (76%).

Figure 2: To what extent do you agree or disagree that...?
 Base: All Respondents (number of respondents shown in brackets)
 Respondents (number of respondents shown in brackets)



3.7 Table 5 below shows the resident sub-groups that are significantly more or less likely to agree with the following statements.

Table 5: To what extent do you agree or disagree that...? Sub-group analysis

To what extent do you agree or disagree that...?	Residents significantly more likely than average to agree	Residents significantly less likely than average to agree
A - You would support development on Brownfield sites (that is sites that have been previously developed) within the towns in the local area?	Aged 55 to 64	-
B - You would support some development on the edges of towns and villages, provided that it was accompanied by the necessary supporting infrastructure such as roads, utilities, schools and community facilities?	-	-
C - You would support some development on the edges of the towns and villages, provided that it doesn't have a significant impact on sensitive landscapes and wildlife sites?	Aged 16 to 24* Aged 65 to 74	-

D - You would support some development on the edges of the towns and villages even if there were some impact on sensitive landscapes and wildlife sites, if necessary to meet local housing needs?	Residents who are wholly retired from work* ¹	Residents in full time education at school, college or university Aged 35 to 44*
E - You would support some development on the edges of towns and villages even if this results in changes to the Green Belt?	Aged 55 to 64*	-
F - You would want development to be limited to brownfield sites only, even if that meant that housing needs would not be met?	-	Aged 16 to 24
G - You think there is very limited capacity in your local area to meet housing needs and therefore housing needs should be met elsewhere in East Herts?	-	-
H - You think there is limited capacity within East Herts district to meet housing needs and therefore housing needs should be met in other districts?	-	Aged 55 to 64
I - You think where there is very limited capacity to meet housing needs in other nearby districts, these needs should be met in East Herts?	-	-
J - Housing development should be focused in areas that have the best access to a wide range of employment opportunities?	Aged 65 to 74* Residents living in a rural area*	-
K - You would support the development of a new settlement, such as a small new town or garden city, provided that it was accompanied by the necessary supporting infrastructure?	Aged 16 to 24 Aged 25 to 34*	Residents who are wholly retired from work Aged 65 and over*

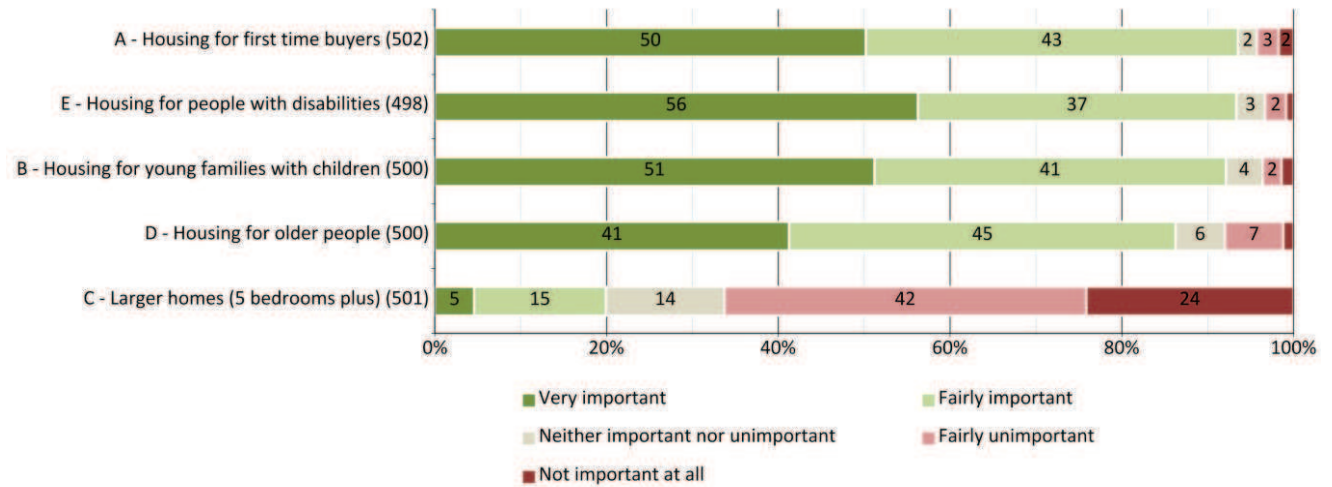
3.8 More than nine in ten residents considered *housing for first time buyers* (94%), *housing for people with disabilities* (93%) and *housing for young families with children* (92%) to be *important*. More than four fifths of residents (86%) also thought that *housing for older people* is important.

3.9 However, two thirds (66%) of residents thought that *larger homes* (5 bedrooms plus) are *unimportant*.

¹ * Subgroups with '*' next to them are significant at a confidence level of 90%

Figure 3: How important or unimportant is...?

Base: All Respondents (number of respondents shown in brackets)



3.10 Table 6 below shows the resident sub-groups that are significantly more or less likely to say that the various types of housing listed are *important*.

Table 6: How important or unimportant is...? Sub-group analysis

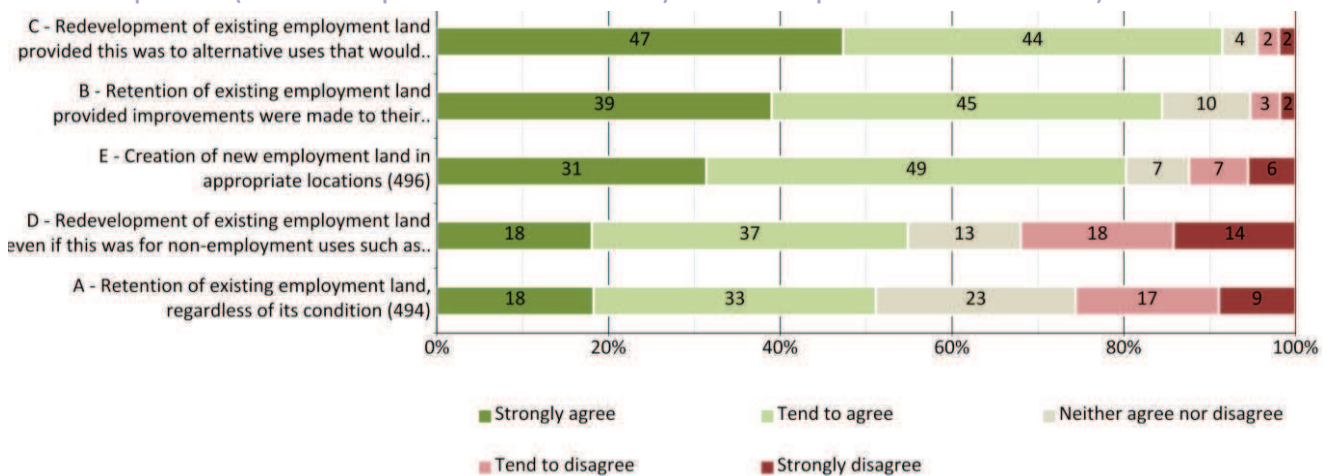
How important or unimportant is...?	Residents significantly more likely than average to say 'important'	Residents significantly less likely than average to say 'important'
A - Housing for first time buyers	Aged 65 and over* Residents in full time education at school, college or university Residents who are wholly retired from work Female residents*	Aged 45 to 54* ²
B - Housing for young families with children	Residents who are wholly retired from work Aged 65 and over*	Residents who are self-employed (full or part-time)
C - Larger homes (5 bedrooms plus)	-	Aged 55 to 64
D - Housing for older people	Aged 25 to 34*	Aged 55 to 64*
E - Housing for people with disabilities	Aged 16 to 24 Residents in full time education at school, college or university	-

² Subgroups with '*' next to them are significant at a confidence level of 90%

- 3.11 Just over nine in ten residents (91%) *agreed* that they would support the *redevelopment of existing employment land provided this was to alternative uses that would provide employment opportunities*.
- 3.12 Four fifths or more of residents also *agreed* that they would *support the retention of existing employment land provided improvements were made to their quality* (84%) and that they would *support the creation of new employment land in appropriate locations* (80%).
- 3.13 More than half of residents also *agreed* that they would support *the redevelopment of existing employment land even if this was for non-employment uses such as housing* (55%) as well as *the retention of existing employment land regardless of its condition* (51%).

Figure 4: To what extent do you agree or disagree that you would support...?

Base: All Respondents (number of respondents shown in brackets)



- 3.14 Table 7 below shows the resident sub-groups that are significantly more or less likely to say that the various types of housing listed are *important*.

Table 7: To what extent do you agree or disagree that you would support...? Sub-group analysis

To what extent do you agree or disagree that you would support...?	Residents significantly more likely than average to agree	Residents significantly less likely than average to agree
A - The retention of existing employment land regardless of its condition?	Male residents Residents who are self-employed (full or part-time) Residents living in a rural area*3	Female residents Residents who are employed in a part time job (Less than 31 hours per week)
B - The retention of existing employment land provided improvements were made to their quality?	-	-
C - The redevelopment of existing employment land provided this was to alternative uses that would provide employment opportunities?	Aged 25 to 34 Aged 35 to 44	
D - You would support the redevelopment of existing employment land even if this was for non-employment uses such as housing?	Aged 55 to 64 Residents who are employed in a part time job (Less than 31 hours per week)	
E - You would support the creation of new employment land in appropriate locations?	Aged 25 to 34 Residents who are employed in a full time job (31 hours or more per week)*	Aged 65 to 74*

³ Subgroups with ‘*’ next to them are significant at a confidence level of 90%

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EAST HERTS COUNCIL

DISTRICT PLANNING EXECUTIVE PANEL – 22 OCTOBER 2014 EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING AND TRANSPORT

DRAFT DISTRICT PLAN CHAPTERS 20 – 25: RESPONSE TO ISSUES RAISED DURING PREFERRED OPTIONS CONSULTATION AND DRAFT REVISED CHAPTERS

WARD(S) AFFECTED: ALL

Purpose/Summary of Report

The purpose of this report is:

- To bring to Members attention the issues raised through the recent consultation in connection with Chapters 20 – 25 of the Draft District Plan Preferred Options, together with Officer responses to those issues; and
- To place before Members for consideration draft revised chapters showing proposed amendments, for subsequent incorporation into a revised Draft District Plan.

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

(A)	the issues raised in respect of Chapters 20-25 of the Draft District Plan Preferred Options, as detailed at Essential Reference Papers B, C, D, E, F and G to this report, be received and considered;
(B)	the Officer response to the issues referred to in (A) above, as detailed in Essential Reference Papers B, C, D, E, F and G to this report, be noted; and
(C)	the draft revised chapters, as detailed in Essential Reference Papers B, C, D, E and F to this report, be noted, with decision on their final content being deferred to allow consideration of further technical work and other issues.

1.0 Background

1.1 The Council published its Draft District Plan Preferred Options for consultation for a period of twelve weeks between 27th February and 22nd May 2014. Several thousand comments were received through the consultation exercise from over a thousand stakeholders including statutory consultees and members of the public. In order to manage these comments, the Council's agreed approach, as set out in its Statement of Community Involvement (October 2013), is to summarise the issues raised through the consultation and record how these issues have been used to inform the next draft of the District Plan.

1.2 This report presents working drafts of five topic chapters: Chapter 20 Landscape; Chapter 21 Heritage Assets; Chapter 22 Climate Change; Chapter 23 Water; Chapter 24 Environmental Quality and Chapter 25 Delivery. **Essential Reference Papers 'B' to 'F'** each contain an Issues Report and a Working Draft Revised Chapter for each topic, which should be read together. There are no amendments proposed for Chapter 25 Delivery so only the Issues Report is presented in **Essential Reference Paper 'G'**.

2.0 Report

2.1 The Issue Reports record each issue raised through the consultation. These are grouped according to the section of the Draft Plan they relate to. The table presents the officer response to each issue and then sets out proposed amendments to the text or policies of the Draft Plan. These proposed amendments are shown in the form of a 'track change' so that readers can clearly see what amendments are proposed. These 'track changes' are then presented *in situ* in the Working Draft Revised Chapters.

2.2 The proposed amendments are presented as Working Draft Revised Chapters only at this stage. This is because they may change between now and final agreement of a revised Draft District Plan. The Council is undertaking further technical studies, which may in turn result in amendments to either the development strategy or proposed allocations. There are also changes expected in the form of new Building Standards. In addition, the Government are continually changing the Planning System and the General Permitted Development Order, which

have implications on local policies and the wider approach to development.

- 2.3 It is therefore the intention that the attached and forthcoming Working Draft Revised Chapters will be presented only to the District Planning Executive Panel and the Executive until such time that the complete suite of amendments are collated and presented as one comprehensive Revised Draft District Plan. This phased approach is considered appropriate given the high number of consultation comments and the completion of detailed technical evidence supporting proposed amendments.

3.0 Implications/Consultations

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

Background Papers

None

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ESSENTIAL REFERENCE PAPER 'A'

IMPLICATIONS/CONSULTATIONS

<p>Contribution to the Council's Corporate Priorities/ Objectives (delete as appropriate):</p>	<p>People – Fair and accessible services for those that use them and opportunities for everyone to contribute</p> <p>This priority focuses on delivering strong services and seeking to enhance the quality of life, health and wellbeing, particularly for those who are vulnerable.</p> <p>Place – Safe and Clean</p> <p>This priority focuses on sustainability, the built environment and ensuring our towns and villages are safe and clean.</p> <p>Prosperity – Improving the economic and social opportunities available to our communities</p> <p>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>
<p>Consultation:</p>	<p>The Report refers to the Draft District Plan consultation carried out between 27th February and 22nd May 2014.</p>
<p>Legal:</p>	<p>There are no legal implications as a result of this Survey.</p>
<p>Financial:</p>	<p>There are no direct financial implications of this Report.</p>
<p>Human Resource:</p>	<p>The continuing work on the Draft District Plan is a considerable burden on human resources.</p>
<p>Risk Management:</p>	<p>None</p>
<p>Health and wellbeing – issues and impacts:</p>	<p>The Draft District Plan in general will have positive impacts on health and wellbeing through a range of policy approaches that seek to create sustainable communities.</p>

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Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
General				
20.1	20	Where site allocations are proposed, the requirements for landscaping, green space, local Green Infrastructure and SUDS are fully supported, and will provide useful 'hooks' upon which to secure considered landscape solutions within these schemes.	Support noted and welcomed	No amendment in response to this issue
Introduction				
20.2	20.1	East Herts remains one of the most rural areas of Hertfordshire, largely because of the undeveloped nature of the district and the largely farmed nature of its environment. There should be reference to this significant landuse which affects the existing landscape character, whatever its biodiversity or other characteristics.	Agreed. <u>Hedgerows are also an important landscape feature.</u>	Amendment to text (new para 20.1.2) <u>The rural landscape is of great significance to the character of East Herts. The district has a rich undulating landscape of open fields and parklands shaped by river valleys and arable plateauxs. Woodland accounts for 9% of total land cover, half of which is classified as being ancient. Hedgerows are also an important feature throughout Hertfordshire, reflecting the historic enclosure of agricultural fields and defining land ownership boundaries. Many hedgerows throughout the district are ancient and are</u>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
				<u>classified as Local Wildlife Sites. They are also key elements of green corridors, contributing towards wider ecological networks</u> The Council's Landscape Character Assessment has identified 63 landscape character areas that seek to capture the distinctiveness and variety of the local landscape.
Landscape Character				
20.3	LAN1	The Canal and River Trust supports this Policy.	Support noted and welcomed	No amendment in response to this issue
20.4	LAN1	Natural England supports this Policy, and welcomes the requirement for a Landscape and Visual Impact Assessment.	Support noted and welcomed	No amendment in response to this issue
20.5	LAN1	LAN 1 Part I should specify the size of development for which LVIA is required. Blanket requirement on all applications is disproportionate. Suggest requirement is limited to major applications.	Agreed that blanket requirement is disproportionate.	Amendment to Policy LAN1: I. Development proposals must demonstrate how they conserve, enhance or strengthen the character and distinctive features of the district's landscape. <u>On</u>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
				<p><u>applications where there is a potential adverse impact on landscape character</u> A Landscape and Visual Impact Assessment should be provided to ensure that impacts, mitigation and enhancement opportunities are appropriately addressed</p>
20.6	LAN1	Part III- The entire District is covered by Landscape Character Assessments so this statement is inappropriately worded. Suggested rewording - "the relevant Landscape Character Assessment will be used to assess proposals".	Not agreed. The LCA does not cover the towns and therefore the current policy wording is considered acceptable.	No amendment in response to this issue
20.7	LAN1	Policy is weak in the linkage to the Landscape Character Assessments. Part I merely states 'Development proposals must demonstrate how they conserve, enhance or strengthen the character and distinctive features of the district's landscape' without reference to LCAs.	Policy should be read as a whole. There is clear reference to LCAs in Part III of the Policy.	No amendment in response to this issue
20.8	LAN1	Policy LAN1 should explicitly reference the key characteristics and strategy and guidelines for managing change and require development proposals to do so.	Policy LAN1 clearly requires reference to the relevant LCA where appropriate. This would include all aspects of the LCA including location, landscape character, key characteristics, distinctive features, physical influences, historic and cultural influences, visual and sensory perception, accessibility, community views, and strategy and guidelines for managing change.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
20.9	LAN1	LAN1 paragraph III could follow the lead of policy HA4 paragraph 1 (e) and be rewritten as "Conform to any 'Landscape Character Assessments' prepared by the District Council, safeguard the Key Characteristics of the area, and comply with the 'Strategy and Guidelines for Managing Change' for the area".	The current Policy wording is considered appropriate. Policy LAN1 clearly requires reference to the relevant LCA where appropriate. This would include all aspects of the LCA including location, landscape character, key characteristics, distinctive features, physical influences, historic and cultural influences, visual and sensory perception, accessibility, community views, and strategy and guidelines for managing change.	No amendment in response to this issue
20.10	LAN1	Policies LAN1 and HA4 are not linked in the draft Plan although the clear intention of the NPPF is that the designation of heritage assets is linked to Landscape Character (NPPF sections 169 and 170).	Where relevant the Landscape Character Assessment is used to inform the Conservation Area Appraisals.	No amendment in response to this issue
20.11	LAN1	Conservation Area Assessments must ultimately and explicitly be linked to LCA's; they should be updated to reference each other.	Where relevant the Landscape Character Assessment is used to inform the Conservation Area Appraisals.	No amendment in response to this issue
20.12	LAN1	'Setting' is mentioned in several places in section 21 and policy HA4 but is not defined. NPPG definition (para 013) should be included to make clearer how development may impact upon setting of heritage asset and be assessed.	The definition of 'setting of a historic asset' is set out in the glossary. See also comments on Chapter 21. Heritage Assets.	No amendment in response to this issue
20.13	LAN1	Support for purpose of policy – if a Landscape and Visual Impact Assessment (LIVA) is required to justify development then it must follow that it should inform the scale of any Green Belt release in the first place. The Council should undertake a LIVA on the land adjacent to Great Innings North of Watton-at-Stone. This should not be left to the Parish Council as part of neighbourhood plan.	Noted. Further Green Belt assessment work is being undertaken.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Landscaping				
20.14	20.3	Recent changes at a golf club in the district have damaged the landscape. Strengthened wording could prevent this happening this again.	Policies LAN1 and LAN2 provide a strong basis for the consideration of landscape, including where appropriate the requirement for a Landscape and Visual Impact Assessment.	No amendment in response to this issue
20.15	20.3.2	With particular reference to rivers and their associated buffer zones only native species should be planted. The Environment Agency also requests the addition of a reference to the management of invasive species.	Agreed in part. Sentence to be added to the end of paragraph 20.3.2. If the Council is aware of any invasive species in the determination of an application a directive would be attached to any permission to inform the applicant.	Amendment to text (para 20.3.2) <u>Along rivers and their associated buffer zones, only native species should be planted.</u>
20.16	20.3.2	HCC supports this paragraph, including protecting landscape feature of biodiversity value and use of locally native species.	Support noted and welcomed	No amendment in response to this issue
20.17	20.3.3	HCC and others support this paragraph, including the recognition of trees and hedgerows in providing a range of beneficial functions.	Support noted and welcomed. <u>Sometimes it could be deemed necessary, where it is essential to maintain the character of the locality, that replacement planting is of mature trees/hedgerows and not saplings. In addition, it is important that replacement planting is successful and monitored to ensure that if any plants die that they are replaced accordingly.</u>	No amendment to text (para. 20.3.2) in response to this issue ... In exceptional circumstances, where development would result in the loss of landscape features, appropriate compensatory planting or habitat creation will be sought. <u>In some cases replacement planting should consist of mature plants. It is important that such planting schemes are monitored over</u>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
				<u>time and action is taken to ensure agreed landscaping plans are fulfilled.</u> Certain plants will be more suited to the physical conditions of the site and to the local landscape character than others...
20.18	20.3.6	The Environment Agency supports this paragraph.	Support noted and welcomed	No amendment in response to this issue
20.19	LAN2	The Environment Agency supports this Policy.	Support noted and welcomed	No amendment in response to this issue
20.20	LAN2	Natural England supports this Policy, and welcomes the reference to habitat creation.	Support noted and welcomed	No amendment in response to this issue
20.21	LAN2	Landscape design proposals should form part of the full planning application and not be delegated to a reserve matter. Landscape schemes should be promoted/encouraged to provide maximum wildlife value.	With an outline application landscaping can be a reserve matter, and it would then be considered by a reserve matter application. With a full planning application details of landscaping may be considered in the determination of the application or via a condition attached to a permission. Policy LAN2 requires proposals to demonstrate how they will retain, protect and enhance existing landscape features which are of amenity and /or biodiversity value.	No amendment in response to this issue
20.22	LAN2	Policy should include wording that prevents the loss of front gardens and boundary features for the purpose of parking which has detrimental effect on the public	Not agreed. In many cases planning permission is not required for the hard surfacing of front gardens or the removal of	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		realm, ecology and availability of on-street parking. Support retention of existing features unless in exceptional circumstances.	boundary features.	

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20 Landscape

20.1 Introduction

20.1.1 Landscape is formed by many factors, including the underlying soils, climate, habitats and human influence, both past and present. Planning policy provides an important framework within which to protect and manage change within landscape.

20.1.2 The rural landscape is of great significance to the character of East Herts. The district has a rich undulating landscape of open fields and parklands shaped by river valleys and arable plateaus. Woodland accounts for 9% of total land cover, half of which is classified as being ancient. Hedgerows are also an important feature throughout Hertfordshire, reflecting the historic enclosure of agricultural fields and defining land ownership boundaries. Many hedgerows throughout the district are ancient and are classified as Local Wildlife Sites. They are also key elements of green corridors, contributing towards wider ecological networks. The Council's Landscape Character Assessment has identified 63 landscape character areas that seek to capture the distinctiveness and variety of the local landscape.

20.2 Landscape Character

20.2.1 There is a diverse landscape character and settlement pattern in the district which is described in Council's Landscape Character Assessment Supplementary Planning Document (September 2007). The document provides a structured evaluation of these landscapes, a landscape strategy and guidelines for conserving and enhancing the character of each area. The document also provides a framework for assessing planning applications. Landscape and Visual Impact Assessments should be submitted with planning applications detailing how the proposal takes into account the Landscape Character Assessment SPD; preserving valuable landscapes through appropriate mitigation and enhancement.

The Landscape Character Assessment Supplementary Planning Document (2007, or as amended) can be viewed and downloaded at: www.eastherts.gov.uk/landscapespd

Policy LAN1 Landscape Character

I. Development proposals must demonstrate how they conserve, enhance or strengthen the character and distinctive features of the district's landscape. On applications where there is a potential adverse impact on landscape character a Landscape and Visual Impact Assessment should be provided to ensure that impacts, mitigation and enhancement opportunities are appropriately addressed.

II. In exceptional circumstances, where damage to landscape character is unavoidable and justified by other material considerations, appropriate mitigation measures will be sought.

III. Where an area is identified in the Council's Landscape Character Assessment this will be used to inform consideration of development proposals.

20.3 Landscaping

20.3.1 Landscape issues must be regarded as an integral part of the development process. Careful and early consideration of design issues and the provision of adequate landscape information can help to avoid delays at a later stage. In assessing the landscape implications of planning applications the site context, proposed layout, future uses and maintenance all need to be taken into account.

20.3.2 The Council will not permit schemes that result in the net loss of landscape features of visual and biodiversity value, and all opportunities for new planting and habitat creation should be fully explored. In exceptional circumstances, where development would result in the loss of landscape features, appropriate compensatory planting or habitat creation will be sought. In some cases replacement planting

should consist of mature plants. It is important that such planting schemes are monitored over time and action is taken to ensure agreed landscaping plans are fulfilled. Certain plants will be more suited to the physical conditions of the site and to the local landscape character than others. As a general rule locally native species are preferable. Along rivers and their associated buffer zones, only native species should be planted.

- 20.3.3 Trees and hedgerows form an important part of our environment and, in the delivery of sustainable development, the retention and planting of new trees and hedgerows is crucial. Trees contribute to the amenity of the landscape and townscape, add maturity to new developments, make places more attractive and help soften the built environment. They also contribute to storm-water management, provide shading and improve air quality.
- 20.3.4 Advice on existing trees and hedgerows, and new planting can be provided by relevant Council officers.
- 20.3.5 Some types of development would benefit from a Design Statement, while a detailed landscape and visual assessment may be needed for particularly prominent development proposals. Major proposals may be subject to formal Environmental Impact Assessment (EIA) procedures. Planning Officers can advise on when these are needed and at what stage.
- 20.3.6 The Council welcomes landscape design which incorporates principles of sustainability such as use of local materials, low energy consumption for construction and maintenance, local recycling of water through surfaces which increase the permeability of the ground, and good pedestrian/cycle links and facilities to reduce car use.

Policy LAN2 Landscaping

I. Development proposals must demonstrate how they will retain, protect and enhance existing landscape features which are of amenity and/or biodiversity value.

II. In exceptional circumstances, where losses are unavoidable and justified by other material considerations, compensatory planting or habitat creation will be sought either within or outside the development site.

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Introduction				
21.1	21.1.1	Opening statement should read 'The District is... and buried remains of significant <i>archaeological and</i> historic interest.'	Agreed.	Amendment to text (para 21.1.1): The District is... and buried remains of significant <u>archaeological and</u> historic interest.
Heritage Assets				
21.2	21.2.1	The clear statement made in paragraph 21.2.1 concerning the valuable contribution made by heritage assets to the economic and social wellbeing of the District is welcomed.	Support noted and welcomed.	No amendment in response to this issue
21.3	21.2.2	Figures cited should be updated to reflect the HER records which contain: 'Over 40 Scheduled Sites (43), 550 Areas of Archaeological Significance in the District.' The figures cited in Chapter 2 (2.2.7) should also be revised.	Agreed.	Amendment to text (para 21.2.2): <ul style="list-style-type: none"> - Over 30<u>40</u> Scheduled Monuments - Nearly 3,100 Listed Buildings - 42 Conservation Areas - 450<u>550</u> Areas of Archaeological Significance
21.4	21.2.4	Add the word 'and' to second sentence: 'The Council will monitor the condition of heritage assets AND publish...'	Agreed. <u>It is also worth adding an information box to provide a web link to the English Heritage Buildings at Risk Register.</u>	Amendment to text (para 21.2.4): The Council will monitor the condition of heritage assets <u>and</u> publish a heritage at risk

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
				register... Further information on the English Heritage Buildings at Risk Register is available on the English Heritage website at: http://risk.english-heritage.org.uk/register.aspx
21.5	HA1	Add 'designated' to title.	Agreed.	Amendment to policy: HA1 <u>Designated</u> Heritage Assets
21.6	21.2.5	The Hertfordshire Historic Environment Record (HER) recommends that it is referenced as the key historic environment source as indicated by NPPF guidance and should be cited as a primary source of information and good practice concerning the identification of heritage assets.	It is agreed that the HER is a source of local knowledge and information. Details to be added to the Plan.	Amendment to text (orange box following para 21.2.5): Further information on local heritage assets is available on the Hertfordshire Historic Environment Record website: http://www.hertsdirect.org/services/envplan/archaeology/sites/
21.7	HA2	If there is a non-designated heritage asset lists, it should be referred to here.	No list exists as such. However non-designated heritage assets are being identified through the Conservation Area Appraisal work that the Council is currently undertaking. Additional wording suggested to paragraph 21.2.5.	Amendment to text (para 21.2.5): Non-designated heritage assets are being identified through the Conservation Area Appraisal work that the Council is currently undertaking.

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
21.8	HA2	<p>NPPF guidance states that undesignated heritage assets are of equivalent significance to designated sites and should be treated in the same way.</p> <p>It is recommended that a further policy statement within HA1 should make this clear, as there are a number in EH that are worthy of national designation consideration.</p>	<p>It is considered that HA2 II statement aims to mitigate any harm to currently non-designated heritage assets. Also 21.2.5 identifies that non-designated assets can be identified by the LPA if they are considered to be of local significance. Therefore it is considered that the existing policies already support the importance of non-designated assets.</p>	No amendment in response to this issue
Archaeology				
21.9	21.3.2	<p>There is a concern that further clarification is necessary on potential Areas of Archaeological Significance (AAS) as it may cause difficulties for EH and HCC. A re-wording is suggested to include this statement:</p> <p><i>'AASs are places within the District that are deemed to be of moderate or high archaeological potential, based on evidence from known heritage assets (buildings, sites, features and finds) held by the HER. This does not mean that areas outside the AASs are without archaeological potential. From time to time alterations to existing AASs, or identification of new AASs will be required based on new data or understanding of significance. Planning Policy does not necessarily prevent new development within AASs. Each application is assessed in the light of its size, position and design to determine the likely level of impact on the historic environment, and what, if any, mitigation is required.'</i></p>	<p>Agreed in part. Proposed clarification is helpful. The final sentence is however already covered in paragraph 21.3.3.</p>	<p>Amendment to text (para 21.3.1):</p> <p><u>Areas of Archaeological Significance (AAS) are places within the District that are deemed to be of moderate or high archaeological potential, based on evidence from known heritage assets (buildings, sites, features and finds). Alterations to existing AAS or identification of new AAS may be required based on new data or understanding of significance.</u></p>
21.10	21.3.2	<p>It is recommended that the HER be stated as the point of reference for pre-application archaeological advice. And that the HER form part of the definition of</p>	<p>Agreed.</p>	<p>New Information Box (following para 21.3.2):</p> <p><u>The Hertfordshire Historic</u></p>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		the information that to be included in a desk based assessment.		<u>Environment Record (HER) is a computerised record of Hertfordshire's historic environment. It contains information on historic buildings, archaeological remains, historic sites and military remains. The HER can be used to identify significant historic remains and finds. It also contains information on surveys and archaeological excavations undertaken in Hertfordshire.</u> <u>Further information can be found from their website: http://www.hertsdirect.org/services/envplan/archaeology/sites/</u>
21.11	21.3.2	It is considered that this statement should be added to better reflect the NPPF paragraph 169 on heritage assets and the discovery of heritage assets. 'When applications are submitted for proposals affecting any heritage asset the applicant must clearly explain what the proposal is for and provide sufficient detail to allow for an informed decision to be made.'	It is considered that this requirement has sufficiently been covered in 21.3.2 for areas of archaeological significance and policies HA1 and HA2 deal with designated and non-designated heritage sites.	No amendment in response to this issue
21.12	21.3.2	A statement is welcomed to outline the archaeological interest of a site can be 'actual or potential'. It is however important to stress that 'character, extent and relative quality of a potential archaeological resource' cannot be ascertained without an archaeological field evaluation, since by its very nature, it is buried and invisible. Due to the fact that archaeological remains are	Agreed.	Amendment to text (para 21.3.2): If features are present then a A field evaluation may also be necessary to define their character, extent and relative quality so that their worth may be assessed in local, regional

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		predominantly underground, 'If features are present' should be deleted and replaced with: 'A field excavation may also be necessary to define their character, extent and relative quality so that their worth may be assessed in local, regional and national contexts'.		and national contexts.
21.13	21.3.3	Recommend the addition of a further requirement within this section which reflects the NPPF guidance, and ensures that funding is secured for the deposition, storage, care and accessibility of archaeological archives, via Section 106 Agreements or Planning Conditions.	It is considered that paragraph 21.3.3 appropriately deals with securing funding for these purposes through either Section 106 Agreements or planning conditions.	No amendment in response to this issue
21.14	21.3.3	Issues raised around the funding for collecting and storing of archaeological artefacts following excavations taking place on development sites. Many local museums are already overcrowded and concerned that the loss of archaeological remains will be detrimental to the community. Clause 141 from the NPPF has been referred to that states there is a requirement for archives to be deposited in a local museum or depository, therefore it is requested that the District Plan identifies that the Section 106 agreement should designate 75% of allocated funds to be paid upon implementation and 25% as contingency depending upon what is found and needs storing. Furthermore, it is requested that museums or depositories are informed at the start of archaeological work to allow time for storage.	It is considered that paragraph 21.3.3 and HA3 II appropriately deals with the recording and publication of potential archaeological remains. Any funding secured through Section 106 Agreements will be dealt with on a case by case basis.	No amendment in response to this issue
21.15	HA3	The use of Article 4 Directions regarding the removal of permitted development rights is a useful and an appropriate instrument in the management of heritage assets. Recommend that the LPA includes this	Not agreed. Policies HA1, HA2 and HA4 sets out appropriate arrangements for the management of heritage assets	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		measure in the draft Plan		
21.16	HA3 II	This should include the provision for the preservation and enhancement of features of known archaeological interest, the appropriate archaeological investigation of such remains prior to development, and the analysis and publication of the results of such investigations.	It is considered that paragraph 21.3.3 and HA3 II appropriately deals with this.	No amendment in response to this issue
Conservation Areas				
21.17	21.4	Section 21.4 should make clear that Landscape can also be a heritage asset.	Paragraph 21.2.1 sets out that heritage assets include a building, monument, site, place, area or landscape.	No amendment in response to this issue
21.18	21.4.2	21.4.2 could be amended to "The special interest of an area can derive from a combination of characteristics, such as the historic street pattern, traditional or notable building styles, or landscape features."	Agreed.	Amendment to text (para 21.4.2): The special interest of an area can derive from a combination of characteristics, such as the historic street pattern, and traditional or notable building styles, <u>or landscape features.</u>
21.19	21.4.5	Typo 'Conservation Area' not Conservations	Agreed	Amendment to text (para 21.4.5): Within the plan period consideration will be given to further areas which may merit designation as Conservations Areas...
21.20	HA4	Issue raised concerning existing development in Conservation Areas. HA4 conforms to the Conservation Area Appraisal, it is suggested that the policy should include a caveat at the end of HA4, to	This issue is raised with reference to a particular site. It is however considered entirely	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		state: 'unless proposals can justify a departure from the Appraisal based on detailed evidence and evaluation.' The Conservation Area Appraisal is argued to be too prohibitive of development in existing development where open spaces, views and vistas are protected against further/future development. This is written in particular about Bishop's Stortford College.	reasonable to require conformity with relevant Conservation Area Appraisals. No change is therefore proposed in response to this issue.	
21.21	HA4	Policy HA4 is supported as it seeks to maintain the importance of retaining the historical character and setting of such areas.	Support noted and welcomed.	No amendment in response to this issue
21.22	HA4	Concern that the terms 'preserve' meaning no change and 'enhance' meaning change, conflict with NPPF guidance where 'conserve' is used meaning to protect from harm. A suggested re-wording is provided: "New development or extensions and alterations to existing buildings in Conservation Areas will be permitted provided that they conserve or enhance the character or appearance of the area, or better reveal its significance."	Agreed.	Amendment to Policy HA4 I: I. New development, extensions and alterations to existing buildings in Conservation Areas will be permitted provided that they preserve conserve or enhance the established character or appearance of the area...
21.23	HA4	Definition of the word 'setting' in Chapter 21 should be defined and illustrated by NPPF definition to make it clear how the impact of a development proposal on the setting of a heritage asset and in Conservation Areas will be assessed.	The definition of 'setting of a historic asset' is set out in the glossary.	No amendment in response to this issue
21.24	HA6	The inclusion of the advertisement policy in Conservation Areas is welcomed.	Support noted and welcomed.	No amendment in response to this issue
21.25	HA6 (b)	Comment that illumination should be externally illuminated only.	Not agreed. It is considered that external illumination may have a detrimental effect upon the quality of a Conservation Area.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Historic Parks and Gardens				
21.26	21.6.1	The Nun's Triangle in Ware, adjoining the A10 is designated under an area tree preservation and as an historic park & garden. This has not been properly maintained by the owners over some time and as correctly stated in the DDP at 21.6.1 this should not inhibit the desire to retain the amenity, managed properly for the benefit of the community.	Noted.	No amendment in response to this issue
21.27	HA8	A more assertive statement should be made to identify those historic parks and gardens are retained and not available for development.	HA8 is clear that development proposals that materially harm the special historic character, appearance or setting of sites listed on the English Heritage 'Register of Historic Parks and Gardens' will not be permitted. The same level of protection also applies to other locally important sites.	No amendment in response to this issue
21.28	HA8	Support the inclusion of Policy HA8, concerning the protection of both nationally important and locally important historic parks and gardens.	Support noted and welcomed.	No amendment in response to this issue

21 Heritage Assets

21.1 Introduction

21.1.1 The District is fortunate in having a rich and varied historic environment, which includes landscapes, sites, buildings and townscapes, and buried remains of significant archaeological and historic interest.

21.2 Heritage Assets

21.2.1 Heritage assets make a valuable contribution to the areas economic and social wellbeing. Heritage assets include a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and non-designated assets identified by the local planning authority.

21.2.2 The District Council recognises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. Heritage assets in East Herts include:

- Over ~~30~~ 40 Scheduled Monuments
- Nearly 3,100 Listed Buildings
- 42 Conservation Areas
- ~~450~~ 550 Areas of Archaeological Significance
- 15 Registered Parks and Gardens of Special Historic Interest
- 59 Locally Listed Historic Parks and Gardens

21.2.3 Not all designated heritage assets are identified under the Planning Acts, for example, scheduled monuments are designated in separate legislation. Nonetheless, planning has a role to ensure that new development does not adversely affect these assets.

21.2.4 The long-term management of heritage assets is essential and where inadequate measures are taken to maintain heritage assets such neglect may result in an asset falling

into disrepair. The Council will monitor the condition of heritage assets and publish a heritage at risk register alongside the register published annually by English Heritage. Regular monitoring is necessary in order to prevent the decline in condition of the District's heritage assets.

[Further information on the English Heritage Buildings at Risk Register is available on the English Heritage website at: http://risk.english-heritage.org.uk/register.aspx](http://risk.english-heritage.org.uk/register.aspx)

Policy HA1 Designated Heritage Assets

I. Development proposals should protect and enhance the historic environment of East Herts.

II. Development proposals that would harm the significance of a designated heritage asset will not be permitted unless it can be demonstrated that the harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

III. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset will not be taken into account in any decision.

IV. The Council will, as part of a positive strategy, pursue opportunities for conservation and enjoyment of the historic environment recognising its role and contribution in achieving sustainable development.

21.2.5 In addition to those heritage assets that are statutorily protected, non-designated assets can be identified by the Local Planning Authority if they are considered to be of local significance. Significance refers to the value of a historic asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from the heritage asset's physical presence, but also its setting. Significance will be measured in terms of how the asset meets the following five criteria:

- Rarity

- Representativeness
- Aesthetic appeal
- Integrity
- Association

Non-designated heritage assets are being identified through the Conservation Area Appraisal work that the Council is currently undertaking.

Further information and good practice on the identification of non-designated heritage assets is available on the English Heritage website at: www.english-heritage.org.uk

Further information on local heritage assets is available on the Hertfordshire Historic Environment Record website: <http://www.hertsdirect.org/services/envplan/archaeology/sites/>

21.2.6 The following policy therefore seeks to ensure that the value and significance of the district's non-designated heritage assets are protected so that they continue to contribute to the richness of the district's historic environment and inform future development.

Policy HA2 Non-Designated Heritage Assets

I. The Council will engage with local communities to identify undesignated heritage assets that contribute to local distinctiveness and refer to existing information in the historic environment record.

II. Where a proposal would adversely affect a non-designated heritage asset, regard will be had to the scale of any harm or loss and the significance of the heritage asset.

21.3 Archaeology

21.3.1 Archaeological remains are a fragile and finite resource. Appropriate management of archaeological remains is essential to ensure they survive in good condition and are not needlessly or thoughtlessly destroyed. Areas of Archaeological Significance (AAS) are places within the

District that are deemed to be of moderate or high archaeological potential, based on evidence from known heritage assets (buildings, sites, features and finds). Alterations to existing AAS or identification of new AAS may be required based on new data or understanding of significance.

- 21.3.2 Where a site has potential archaeological interest (whether scheduled or unscheduled) a desk based assessment will be required. This should be based on the collation of existing written and graphic information, in order to identify the likely character, extent and relative quality of the actual or potential archaeological resource. ~~If features are present then~~ A field evaluation may also be necessary to define their character, extent and relative quality so that their worth may be assessed in local, regional and national contexts.

The Hertfordshire Historic Environment Record (HER) is a computerised record of Hertfordshire's historic environment. It contains information on historic buildings, archaeological remains, historic sites and military remains. The HER can be used to identify significant historic remains and finds. It also contains information on surveys and archaeological excavations undertaken in Hertfordshire.

Further information can be found from their website: <http://www.hertsdirect.org/services/envplan/archaeology/sites/>

- 21.3.3 The case for preservation will be assessed on the merits of the individual application. In cases where preservation in situ would not be required, developers may be asked to enter into a Section 106 Agreement before planning permission is given. This secures excavation, recording and publication of information prior to development starting. Where planning permission is given, conditions may be attached to the grant of permission to ensure that excavation and recording is carried out before development work starts, and to ensure that a 'watching brief' is maintained while work progresses.
- 21.3.4 Areas of Archaeological Significance, including potential areas, are identified on the Policies Map. The sites are correct at the time of publication of the District Plan but may

be subject to change through future reviews. The Council will refer to the most up-to-date position.

Policy HA3 Archaeology

I. Where a site has the potential to include heritage assets with archaeological interest (whether scheduled or unscheduled), applicants should submit an appropriate desk based assessment and, where necessary, the results of a field evaluation prior to the submission of an application.

II. Where development is permitted on sites containing archaeological remains, planning permission will be subject to conditions and/or formal agreements requiring appropriate excavation and recording in advance of development.

21.4 Conservation Areas

21.4.1 Since 1968 local authorities have been able to designate Conservation Areas. Conservation Areas can be designated if they are of special historic or architectural interest, the character and appearance of which it is desirable to preserve or enhance.

21.4.2 There is no standard specification for Conservation Areas. The special interest of an area can derive from a combination of characteristics, such as the historic street pattern, ~~and~~ traditional or notable building styles, or landscape features. Important to all Conservation Areas is the visual 'quality of place' they possess. This aspect principally results from the way in which the buildings and spaces relate to each other, together with the inherent quality of the buildings and other structures.

21.4.3 The District Council has commenced a programme of Conservation Area appraisal work to identify and document what factors are considered to make up the special character of these areas. These documents also include management

proposals to ensure the continued enhancement of these areas.

21.4.4 In order to protect their special environment, stricter controls over demolition, works to trees and new development apply within Conservation Areas. These controls are not intended as a hindrance to change, but as a positive management tool to safeguard the character of the area as a whole.

21.4.5 The district's Conservation Areas are identified on the Policies Map. Within the plan period consideration will be given to further areas which may merit designation as Conservation Areas and to the review of existing Conservation Area boundaries.

Policy HA4 Conservation Areas

I. New development, extensions and alterations to existing buildings in Conservation Areas will be permitted provided that they ~~preserve~~ conserve or enhance the established character or appearance of the area. Development proposals outside a Conservation Area which affect its character and setting will be considered likewise. Proposals will be expected to:

- (a) Respect established building lines, layouts and patterns;
- (b) Use materials and adopt design details which are traditional to the area;
- (c) Be sympathetic in scale, proportion, form, height and overall character to the surrounding area;
- (d) In the case of alterations and extensions, be complementary and sympathetic to the parent building; and
- (e) Conform to any 'Conservation Area Appraisals' prepared by the District Council and safeguard all aspects which contribute to the area's significance, including important views and green spaces.

II. Consent for demolition will only be granted if the building or structure makes no positive contribution to the character of the Conservation Area.

21.4.6 In the district's town centres, frontages to shops and commercial premises play a key role in defining the character and quality of the Conservation Areas. The Council is therefore keen to ensure that a high quality environment is maintained, consistent with commercial and economic considerations. The introduction of unsympathetic advertisements can compromise the quality of the environment. Signage and lighting must therefore be sensitive to the character of these areas. For example, poster boarding are seldom appropriate in Conservation Areas.

Policy HA5 Shopfronts in Conservation Areas

I. Proposals for new shop front or commercial premise frontage or alterations to existing ones will be permitted where the proposed design is sympathetic to the scale, proportions, character and materials of the structure, adjoining buildings and the street scene in general.

II. Shop fronts of architectural or historic interest shall be retained and repaired as necessary.

III. Security features should be designed in a sensitive manner which respects the overall character of the frontage and location, facilitates natural surveillance and maintains an attractive street scene. The use of architectural solutions combined with the use of an internal open lattice grille is preferred. Alarm boxes should be of a discreet colour and size, located carefully in relation to the elevation of the building, whilst being obvious enough to deter an intruder.

Policy HA6 Advertisements in Conservation Areas

Where express consent is required within Conservation Areas the District Council will only accept advertisements where they:

(a) Are either painted or individually lettered in a suitable material of an appropriate size and design in relation to the building or fascia upon which they are to be displayed;

- (b) Are preferably non-illuminated. Where illumination is proposed as necessary it should be discreet in size and of a minimum level;
- (c) Are of a traditional fascia or hanging type; and
- (d) Are of an appropriate size necessary to convey their message.

21.5 Listed Buildings

- 21.5.1 Under the Planning (Listed Buildings and Conservation Areas) Act 1990 there is a statutory duty to compile Lists of Buildings of Special Architectural or Historic Interest for the whole country.
- 21.5.2 The 'National Heritage List for England' identifies those buildings which are of special interest and gives the Council extra powers to protect them, as well as imposing extra responsibilities on their owners.

English Heritage maintains the list of properties and structures (including their descriptions and location maps) which can be accessed from their website at: www.english-heritage.org.uk/

- 21.5.3 Listed buildings of special architectural or historic interest must be sensitively repaired and improved, using traditional materials and techniques. Appropriate new uses should be found for them in order to secure their future survival. Demolition will not normally be allowed. Alterations/additions to listed buildings require the greatest skill and care, in order to avoid damage to the intrinsic character of the buildings themselves, including interiors and fixtures, and to their setting. Similarly, new development affecting a listed building must be sympathetically designed, so as not to harm the listed building's historic integrity and identity. The use of legal powers will be considered where listed buildings are at risk from wilful neglect, long-term dereliction or abandonment.
- 21.5.4 'Listed building consent' is required from the District Council for any works that affect a building's special character. The listing of a building is intended to ensure that it will be conserved in accordance with its significance. However, alterations and improvements can be made where they are compatible with the special architectural or historic interest of

the building. The designation allows changes to be carefully scrutinised when a planning application is made. To support applicants the Council has produced a series of guidance notes on the preservation and repair of historic materials and buildings.

The East Herts guidance notes on the preservation and repair of historic materials and buildings can be viewed and downloaded from the Council's Website at: www.eastherts.gov.uk/conservationandheritage

Policy HA7 Listed Buildings

I. The Council will actively seek opportunities to sustain and enhance the significance of Listed Buildings and ensure that they are in viable uses consistent with their conservation.

II. In considering applications the Council will ensure that proposals involving the alteration, extension, or change of use of a Listed Building will only be permitted where:

(a) The proposal would not have any adverse effect on the architectural and historic character or appearance of the interior or exterior of the building or its setting; and

(b) The proposal respects the scale, design, materials and finishes of the existing building(s), and preserves its historic fabric.

III. Proposals that affect the setting of a Listed Building will only be permitted where the setting of the building is enhanced.

21.6 Historic Parks and Gardens

21.6.1 Historic parks and gardens are a fragile and finite resource: they can easily be damaged beyond repair or lost forever. They are an important part of the heritage and environment of the district. They comprise of a variety of features: the open space; views in and out; the planting; water features; built features and archaeological remains. There is a need to protect such sites and their settings from new development which would destroy or harm the historic interest.

21.6.2 The English Heritage 'Register of Historic Parks and Gardens of special historic interest in England' was established in 1983 and currently identifies over 1,600 sites assessed to be of national importance. Fifteen of these are in the district and are identified on the Policies Map.

The 'Register of Historic Parks and Gardens of special historic interest in England' can be viewed and downloaded at: www.english-heritage.org.uk

21.6.3 The main purpose of this Register is to celebrate designed landscapes of note, and encourage appropriate protection. It is hoped that by identifying sites in this way, their value and significance will be conserved and enhanced both by those those who own them, and others who have a role in their protection and their future.

21.6.4 The registration of designed landscapes does not entail additional planning controls but does make these assets a 'material consideration' in the planning process, meaning that planning authorities must consider the impact of any proposed development on the landscape's special character. The Council will through its planning role promote conservation and public appreciation of the District's designed landscapes.

21.6.5 In addition to those parks and gardens on the Register, the Hertfordshire Gardens Trust has also compiled a list of other locally important sites in the district. These are considered by the District Council to be of sufficient quality to warrant appropriate preservation and protection when considering development proposals under the following policy.

21.6.6 Further information, including a list of locally important parks and gardens, can be found in the Council's 'Historic Parks & Gardens' Supplementary Planning Document (September 2007).

The 'Historic Parks & Gardens' Supplementary Planning Document (September 2007, or as amended) can be viewed and downloaded at: www.eastherts.gov.uk/historicparksandgardensspd

Policy HA8 Historic Parks and Gardens

I. Development proposals that materially harm the special historic character, appearance or setting of those sites listed on the English Heritage 'Register of Historic Parks and Gardens' will not be permitted. The same level of protection will be afforded to other locally important sites.

II. Where appropriate, the District Council will actively encourage proposals for the repair, restoration and management of historic parks and gardens.

21.7 Enabling Development

21.7.1 Enabling development is the means of securing the long-term future of a significant place when conservation through development in compliance with policy cannot do so.

21.7.2 The vast majority of significant places survive because they are capable of beneficial use. Their maintenance is justified by their usefulness to, and appreciation by, their owners, not just value in the property market, either in their own right or as part of a larger entity. An historic garden, for example, normally adds to the amenities and value of a house. The problem that enabling development typically seeks to address occurs when the cost of maintenance, major repair or conversion to the optimum viable use of a building is greater than its resulting value to its owner or in the property market. This means that a subsidy to cover the difference – the 'conservation deficit' – is necessary to secure its future.

21.7.3 The scale and range of enabling development can vary greatly. Whilst often associated with residential development

to support the repair of a country house, it can include, for example, an extension acceptable in historic building terms, but exceeding the maximum size permitted under plan policies for the rural area.

Detailed guidance on how an applicant might make an enabling development application is set out in English Heritage's guidance on 'Enabling Development and the Conservation of Significant Places', which can be viewed and downloaded at: www.english-heritage.org.uk

Policy HA9 Enabling Development

I. Proposals for enabling development will be assessed in accordance with the English Heritage's latest guide on 'Enabling Development and the Conservation of Significant Places'.

II. Enabling development which would secure the future of a significant place, but would be contrary to other planning policy objectives, should be unacceptable unless:

(a) The benefits of a proposal for enabling development, which would secure the future conservation of a significant place, outweigh any public harm or loss consequent upon conflicts with and the departure from other District Plan policies;

(b) The proposal does not materially detract from the archaeological, architectural, historic, artistic, landscape or nature conservation of the site or its setting;

(c) The proposal avoids detrimental fragmentation of management of the place;

(d) The proposal is necessary to resolve problems arising from the inherent needs of the place;

(e) Sufficient subsidy is not available from any other source; and

(f) It is clearly demonstrated that the proposal is the minimum necessary to ensure the future of the site.

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Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Adaptation				
22.1	22.2	Local food production is vital and provision should be made for people to grow their own food. Agricultural land should be protected	The final bullet point to paragraph 22.2.2 advocates the provision of allotments. Paragraph 112 of the NPPF sets out planning policy in respect of agricultural land so, while it is an important issue, it is not considered necessary to repeat this issue within the District Plan.	No amendment in response to this issue
22.2	22.2.2	Support from HCC for the inclusion of green roofs and green walls and provision of green infrastructure. Orchards could also be included.	Support noted and welcomed. <u>Reference to orchards will be added.</u>	No amendment in response to this issue Amendment to text (para 22.2.2) in response to this issue <u>5.</u> providing green infrastructure including woodlands, <u>orchards</u> , street trees and green landscaping, parks, sports grounds, allotments, and green roofs.
22.3	22.2.2	All new development must be built to Passivhaus standards	Passivhaus is one of a number of sustainability standards that maybe utilised. Section 22.1 refers to Building Futures which is a Hertfordshire guide to climate change adaptation. A Ministerial Statement on 13 th March 2014 indicated that the Government will be seeking to incorporate sustainability standards within Building Regulations. However, the current situation is uncertain. The Council will therefore monitor the situation on an ongoing basis	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
			and react to any changes when they occur.	
22.4	CC1	Support, including from HCC, although reference should be made to the urban heat island effect.	Support noted and welcomed. The policy refers to the need to minimise overheating in urban areas while the supporting text identifies different methods of achieving this.	No amendment in response to this issue
22.5	CC1	The Canal and River Trust promote the use of river/canal water for heating and cooling buildings.	Noted.	No amendment in response to this issue
22.6	CC1	The Bishop's Stortford North Consortium considers that the policy needs to be revisited following the Ministerial Statement in March concerning incorporating sustainability standards through Building Regulations rather than the planning system.	A Ministerial Statement on 13 th March 2014 indicated that the Government will be seeking to incorporate sustainability standards within Building Regulations. However, the current situation is uncertain. The Council will therefore monitor the situation on an ongoing basis and react to any changes when they occur.	No amendment in response to this issue
22.7	CC1	The Environment Agency state that green roofs should be promoted in particular as they provide multiple benefits.	Agreed. Policy CC1 and its supporting text include reference to green roofs	No amendment in response to this issue
22.8	CC1	The standards contained within the Building Futures toolkit will increase construction costs. This should be factored into viability testing.	A Ministerial Statement on 13 th March 2014 indicated that the Government will be seeking to incorporate sustainability standards within Building Regulations. The Building Futures toolkit identifies ways in which such standards could be met. The cost implications of all District Plan and national policies are being factored into ongoing viability work.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Mitigation				
22.9	CC2	Support from HCC although it may be difficult to enforce the policy without a defined standard. The policy could undermine related objectives of promoting the use of recycled, sustainable and local materials.	Support noted and welcomed. It is not considered necessary or appropriate to include defined standards. The policy does require developments to demonstrate how carbon dioxide emissions will minimised. The policy approach should work in tandem with other related objectives and not undermine them.	No amendment in response to this issue
22.10	CC2	The Bishop's Stortford North Consortium considers that the policy needs to be revisited following the Ministerial Statement in March concerning incorporating sustainability standards through Building Regulations rather than the planning system.	A Ministerial Statement on 13 th March 2014 indicated that the Government will be seeking to incorporate sustainability standards within Building Regulations. However, the current situation is uncertain. The Council will therefore monitor the situation on an ongoing basis and react to any changes when they occur.	No amendment in response to this issue
Renewable and Low Carbon Energy				
22.11	CC3	Support from HCC for the need to assess impacts on environmental assets in consideration of renewable energy proposals	Support noted and welcomed.	No amendment in response to this issue
22.12	CC3	The policy does not go far enough. All development must have renewable schemes and they must provide 90% of energy requirements. All building must be to Passivhaus standards. Retrofitting is also important.	It is acknowledged that climate change mitigation is an important issue. However, the Council must not impose standards which would impact on viability and prevent sites from coming forward for development	No amendment in response to this issue
22.13	CC3	The Bishop's Stortford North Consortium and Persimmon Homes consider that the policy needs to be revisited following the Ministerial Statement in March concerning incorporating sustainability	A Ministerial Statement on 13 th March 2014 indicated that the Government will be seeking to incorporate sustainability standards within Building Regulations.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		standards through Building Regulations rather than the planning system.	However, the current situation is uncertain. The Council will therefore monitor the situation on an ongoing basis and react to any changes when they occur.	
22.14	CC3	The Council should consider the issue of 10% of energy demand coming from renewable sources within its viability work and should not rely on the revoked East of England Plan.	The requirements of the policy will be included within a plan wide viability assessment through ongoing evidence based work.	No amendment in response to this issue
22.15	CC3 Part III	Part III is not justified as the Council has no evidence to make a judgement on the special character of the rural area or on the nature of long distance views. There is no reference to the Landscape Character Assessment. This part of the policy should be removed.	The PPG states that the need for renewable energy does not automatically override environmental protections. The Landscape Character Assessment would be a material consideration in planning decisions. However, impact on the character of the rural area and on long distance views would need to be assessed on a case by case basis taking into account the nature of the proposal.	No amendment in response to this issue
22.16	22.4.5	The paragraph is not positively prepared in accordance with the NPPF and should not require a blanket ban on such technologies within or near urban areas. The paragraph should be revised to say: 'The Council will support proposals for renewable forms of energy used for heating. Where proposals are within or near the urban areas of settlements, applications should be supported by an air quality assessment, as explained in Policy EQ4 (Air Quality) (see Chapter 24: Environmental Quality)'.	Agreed. <u>This paragraph needs to reflect the requirements of Policy DES1 and should be more proactive than just making an assessment of potential impacts. The paragraph should also be brought before the Policy.</u>	Amendment to text (para 22.4.5): Some <u>The Council will support proposals for renewable forms of energy used for heating. In line with Policy DES1, the Council will expect proposals to embrace renewable, zero and low-carbon technology to fulfil some, if not all, of the expected energy use of proposed development. may, cumulatively or in isolation, result in a rise in particulates</u>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
				<p>which can be harmful to human health. For this reason such technologies will not be permitted <u>Where proposals are within or near the urban areas of settlements, applications should be supported by an air quality assessment, which details proposed mitigation measures where necessary.</u> as explained in Policy EQ4 (Air Quality) (see Chapter 24: Environmental Quality).</p>
General Issues				
22.17		Natural England fully supports climate change adaptation by design and the role that Green Infrastructure can provide in mitigating the effects of climate change.	Support noted and welcomed.	No amendment in response to this issue

Other Proposed Amendments

Location/ Paragraph/Policy	Issue	Proposed Amendment
22.1	Add new paragraph to explain the current uncertainty with regards to sustainability standards.	<p>Amendment to text (new para 22.1.3):</p> <p><u>22.1.3 The Government has announced its intention to amend Building Regulations in order to incorporate sustainability standards and targets. This review is likely to address zero carbon</u></p>

		<u>standards, carbon and renewable energy targets and allowable solutions. East Herts Council will review any changes as they occur. The approach outlined in this chapter may therefore be subject to change</u>
<u>22.2.1</u>	<u>The introduction is too narrow in its explanation for the cause of climate change. It should refer not just to the burning of fossil fuels, but also the release of carbon from other practices such as agriculture and deforestation.</u>	<u>Amendment to text (para.22.2.1)</u> Climate change is caused in part by greenhouse gases that are primarily produced through the burning of fossil fuels <u>and the release of carbon through activities such as agriculture and the loss of woodland for example.</u>
22.3.5	Delete paragraph as reference to Government review of sustainability standards has moved to Introduction.	Amendment to text (para 22.3.5): 22.3.5 The government is currently undertaking a review of local standards which will include planning and building regulations. The review is likely to address zero carbon standards, carbon and renewable energy targets, and allowable solutions. It is anticipated that this will include the role of planning policy, and therefore the approach outlined here may be subject to change.
22.4.3	Reference to out of date national guidance	Amendment to text (para 22.4.3): At the same time as promoting renewable energy, the Council is also mindful of the need to ensure that an appropriate balance is maintained between the benefits of renewable energy and other constraints and considerations, <u>in accordance with the National Planning Practice Guidance.</u> The Department for Communities and Local Government (DCLG) issued in July 2013 specific planning guidance for renewable and low carbon energy. Government planning practice guidance can be a material consideration in planning decisions and should generally be followed unless

		<p>there are clear reasons not to.</p> <p>(Box containing text from previous Government guidance also deleted, see amended chapter).</p>
<p>Policy CC3</p>	<p>Response to issue 16.34. Add in the fact that the safe operation of aerodromes will be a factor when considering applications for renewable energy schemes.</p>	<p>(d) the amenity of neighbouring residents</p> <p>(e) air quality and human health; <u>and-</u></p> <p><u>(f) the safe operation of aerodromes.</u></p>

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22 Climate Change

22.1 Introduction

22.1.1 Climate change is caused in part by greenhouse gases that are primarily produced through the burning of fossil fuels and the release of carbon through activities such as agriculture and the loss of woodland for example. Problems commonly associated with climate change include flooding and extreme weather patterns. Climate change is both a global and local issue.

22.1.2 Building Futures is a Hertfordshire guide to promoting sustainability in development, including modules on Climate Change Adaptation and also on Energy and Climate Change. Both modules include practical advice in relation to measures which can help to address climate change, and which should be considered alongside the policy requirements of the District Plan.

Building Futures is an interactive website which can be accessed at: www.hertslink.org/buildingfutures

22.1.3 The Government has announced its intention to amend Building Regulations in order to incorporate sustainability standards and targets. This review is likely to address zero carbon standards, carbon and renewable energy targets and allowable solutions. East Herts Council will review any changes as they occur. The approach outlined in this chapter may therefore be subject to change.

22.2 Adaptation

22.2.1 Climate change is expected to result in hazards such as heatwaves, flooding, and drought. Adaptation means improving our resilience to such impacts. This section addresses the issue of overheating. Measures related directly to water and climate change adaptation, including flood risk, water efficiency, and sustainable urban drainage, are contained within Chapter 23: Water.

22.2.2 Measures to address overheating may be undertaken at building level, neighbourhood scale, and town or urban extension scale. Examples of measures include:

1. using site landform and landscape to benefit from shelter, to minimise heat losses in winter, provide adequate shade in summer, and to catch breezes
2. using deciduous trees to maximise shade in summer and allow light in during the winter, or structural or functional design to achieve a similar effect
3. minimising energy demand, for example using cross-ventilation, to avoid a vicious circle whereby increased demand for air conditioning generates further climate-changing emissions
4. using materials that prevent the penetration of heat to a building, which can include green roofs or walls, light coloured materials in exposed surfaces, and for large car parks; road energy systems which store heat and release it during the winter months
5. providing green infrastructure including woodlands, orchards, street trees and green landscaping, parks, sports grounds, allotments, and green roofs.

22.2.3 Such measures may have a number of wider benefits, including reduced energy bills and improving the quality of the built environment. The Building Futures Climate Change Adaptation module contains further guidance on adaptation solutions.

Policy CC1 Climate Change Adaptation

All new development should:

- (a) Demonstrate how the design, materials, construction and operation of the development would minimise overheating in summer and reduce the need for heating in winter; and

(b) Integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include appropriate tree planting, green roofs and walls, and soft landscaping.

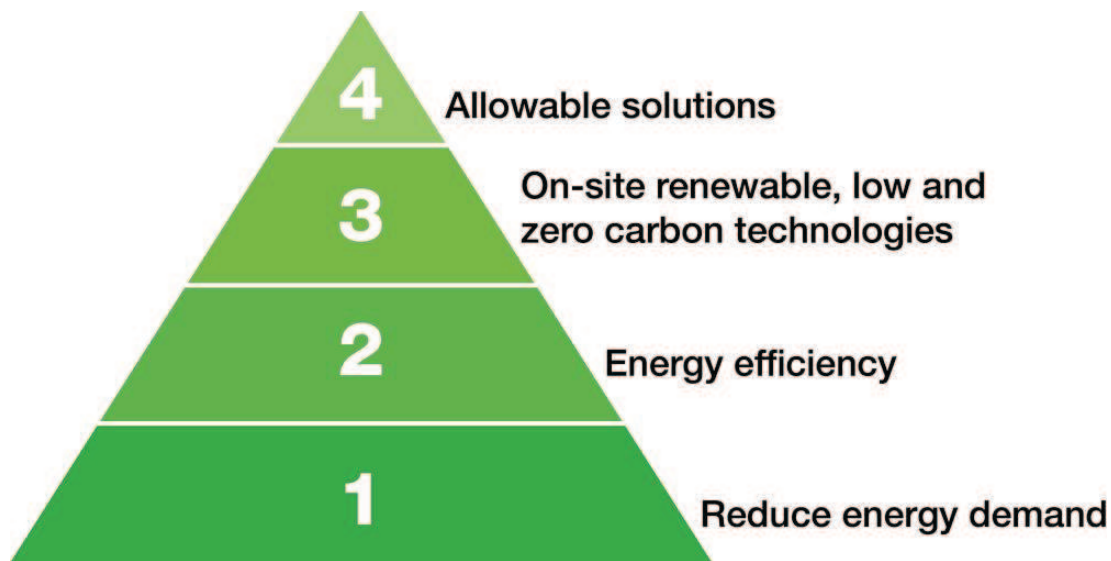
22.3 Mitigation

22.3.1 Carbon emissions originate from a wide range of sources, including transport, construction, and all forms of energy use including heating and appliances. The Climate Change Act (2008) sets out a legally binding target for reducing the UK's carbon dioxide emissions, in order to mitigate or reduce the impacts of climate change. Planning plays a role in terms of locating development so as to minimise the need to travel, which is addressed in the transport policies and also in the development strategy for the district.

22.3.2 There are four main types of approach to reduction of carbon emissions from development. These are as follows:

1. Reduce energy demand by providing natural ventilation and illumination, good insulation, and shading as described in relation to climate change adaptation
2. Increase energy efficiency through the use of efficient services and appliances, and low-energy lighting
3. Generate heat and/or power through on-site low and zero carbon technologies such as Combined Heat and Power (CHP), solar panels, biomass boilers, or heat pumps
4. Offsetting on-site carbon emissions through off-site means, for example retrofitting existing buildings elsewhere, investment in energy schemes such as district heating, payment into a community investment fund, or use of Green Energy Tariffs. These are known as 'allowable solutions'.

Figure 22.1 Energy Hierarchy



22.3.3 These four approaches are usually represented as an energy hierarchy as illustrated in Figure 22.1 above, in which the most effective ways of reducing carbon dioxide are shown at the base and must be fully explored first.

22.3.4 Wherever possible, developers should use reliable technologies and approaches with a proven track record.

~~22.3.5 The government is currently undertaking a review of local standards which will include planning and building regulations. The review is likely to address zero carbon standards, carbon and renewable energy targets, and allowable solutions. It is anticipated that this will include the role of planning policy, and therefore the approach outlined here may be subject to change.~~

Policy CC2 Climate Change Mitigation

I. All new developments should demonstrate how carbon dioxide emissions will be minimised across the development site, taking account of all levels of the energy hierarchy achieving above and beyond the requirements of Building Regulations.

II. Carbon reduction should be met on-site unless it can be demonstrated that this is not feasible or viable. In such cases effective offsetting measures to reduce on-site carbon emissions will be accepted as allowable solutions.

III. The energy embodied in construction materials should be reduced through re-use and recycling of existing materials and the use of sustainable materials and local sourcing.

22.4 Renewable and Low Carbon Energy

22.4.1 There are a variety of opportunities for generating clean energy. The Hertfordshire Renewable and Low Carbon Energy Technical Study (July 2010) includes energy opportunity maps for East Hertfordshire, which may assist in the selection of appropriate carbon saving methods depending on the location of development proposals.

The Hertfordshire Renewable and Low Carbon Energy Technical Study (July 2010) can be viewed and downloaded from the Hertfordshire County Council Website at: www.hertsdirect.org/services/envplan/plan/renewableenergy/

22.4.2 The East of England Plan (2008) required 10% of energy to come from decentralised, renewable or low carbon technologies for new development of more than 10 dwellings of 1000m² of non-residential floorspace. Despite the revocation of the Plan in January 2013, the District Council, in line with its commitment to mitigate the impacts of climate change, will take forward this policy requirement.

22.4.3 At the same time as promoting renewable energy, the Council is also mindful of the need to ensure that an appropriate balance is maintained between the benefits of renewable energy and other constraints and considerations: [in accordance with the National Planning Practice Guidance \(NPPG\)](#). ~~The Department for Communities and Local Government (DCLG) issued in July 2013 specific planning guidance for renewable and low carbon energy. Government planning practice guidance can be a material consideration~~

~~in planning decisions and should generally be followed unless there are clear reasons not to.~~

~~Planning Practice Guidance for Renewable and Low Carbon Energy (DCLG, July 2013), Paragraph 15~~

~~In shaping local criteria for inclusion in Local Plans and considering planning applications in the meantime, it is important to be clear that:~~

~~the need for renewable or low carbon energy does not automatically override environmental protections;~~

~~cumulative impacts require particular attention, especially the increasing impact that wind turbines and large scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases;~~

~~local topography is an important factor in assessing whether wind turbines and large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas;~~

~~great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;~~

~~proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration;~~

~~protecting local amenity is an important consideration which should be given proper weight in planning decisions.~~

22.4.4 Taking account of this guidance, Policy CC3 takes a balanced approach, promoting renewable and low carbon energy where the impacts can be satisfactorily mitigated.

22.4.5 In line with Policy DES1, the Council will expect proposals to embrace renewable, zero and low-carbon technology to fulfil some, if not all, of the expected energy use of the proposed

development. Where proposals are within or near the urban areas of settlements, applications should be supported by an air quality assessment, which details proposed mitigation measures where necessary.

Policy CC3 Renewable and Low Carbon Energy

I. All new development of more than 10 dwellings or 1,000m² of non-residential floorspace must produce at least 10% of the total predicted energy requirements from on-site renewable technologies or decentralised renewable sources unless it can be demonstrated that this is not feasible or viable.

II. The Council will permit new development of sources of renewable energy generation subject to assessment of the impacts upon:

- (a) environmental and historic assets;
- (b) visual amenity and landscape character;
- (c) local transport networks;
- (d) the amenity of neighbouring residents and sensitive uses; and
- (e) air quality and human health; and
- (f) the safe operation of aerodromes

III. In considering the impact of renewable technologies, the Council will attach particular importance to maintaining the special countryside character of the rural area, including the preservation of long-distance views from public rights of way.

~~22.4.5 Some The Council will support proposals for renewable forms of energy used for heating may, cumulatively or in isolation, result in a rise in particulates which can be harmful to human health. For this reason such technologies will not be permitted Where proposals are within or near the urban areas of settlements, applications should be supported by an air quality assessment. as explained in Policy EQ4 (Air Quality) (see Chapter 24: Environmental Quality).~~

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
Introduction				
23.1	23.1.1	Support	Support noted and welcomed	No amendment in response to this issue
23.2	23.1.1	HERT4: Water supply to this area is already at maximum capacity which at times can affect the water pressure. Adding another 150 properties will stretch it to breaking point.	The Council will continue to engage with the relevant water providers in order to ensure that the proposed level and location of growth can be provided for.	No amendment in response to this issue
23.3	23.1.2	The Council must work with other bodies in order to implement policies.	Agreed. It will be necessary for the Council to work closely with infrastructure providers and other bodies, both during the preparation of the District Plan, and post adoption.	No amendment in response to this issue
Flood Risk				
23.4	23.2	Development along rivers should be refused on flooding grounds	Policy WAT1 states that the functional floodplain (Flood Zone 3b) will be protected from inappropriate development. The Sequential Test will be utilised for development proposals within Flood Zones 2, 3a and 3b in order to steer development away from areas most at risk from flooding in accordance with the National Planning Policy Framework (NPPF).	No amendment in response to this issue
23.5	23.2.1	Support from HCC Ecology for the recognition of damage to wildlife habitats when considering developments which also affect flooding and channel stability.	Support noted and welcomed.	No amendment in response to this issue

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
23.6	23.2.2	Environment Agency supports this paragraph although there is a need to ensure that the SFRA is up to date.	Support noted and welcomed. The SFRA will be revised and updated before Publication stage.	No amendment in response to this issue
23.7	23.2.3	The weblink needs to be updated to take account of Environment Agency website move.	Noted.	Amendment to text For more information on the Environment Agency's Standing Advice go to: www.environment-agency.gov.uk https://www.gov.uk/flood-risk-standing-advice-frsa-for-local-planning-authorities
23.8	WAT1	Policy must apply equally to infilling, not just new development so that flood risk in Stanstead Abbots is not increased.	The policy applies to all forms of development including infilling.	No amendment in response to this issue
23.9	WAT1	Support including from HCC Ecology and Lee Valley Regional Park Authority for protecting the floodplain and returning it to Greenfield status where possible.	Support noted and welcomed	No amendment in response to this issue
23.10	WAT1	Environment Agency states that policy and background text should be strengthened by making reference to the Sequential Test and the area of search. Reference could also be made to not allowing development under a certain number of dwellings to be located within Flood Zones 2 or 3. Also noted that not all vulnerable developments in Flood Zones 2 and 3 are required to pass the Exception Test, such as change of use to residential, although points a) to d) would still need to be met.	Noted. It is agreed that the policy and supporting text should refer to the Sequential Test. It is recognised that not all development is required to pass the Exception Test and it is considered that the existing policy wording reflects this.	Amendment to text (para 23.2.3) <u>In order to steer new development to areas with the lowest probability of flooding, the Sequential Test, and where necessary the Exception Test will be used.</u> For development proposals of 1 hectare or greater..... Amendment to Policy WAT1 WAT1 Flood Risk Management I. The functional floodplain will be

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				<p>protected from <u>inappropriate</u> development.....</p> <p>III. <u>In order to steer new development to areas with the lowest probability of flooding, the Sequential Test will be used.</u> In exceptional circumstances, if developments.....</p>
23.11	WAT1 Part I	The criteria for determining feasibility of returning flood plain to Greenfield land should be explained.	The feasibility of returning functional floodplain to Greenfield land should be considered on a site by site basis through the planning application process. It is therefore not considered necessary to include specific criteria within the policy.	No amendment in response to this issue
23.12	WAT1 Part II	<p>Add 'both on the site and to neighbouring land' to end of sentence.</p> <p>Thames Water suggested amendment: 'Development proposals should neither increase the likelihood of, intensity of, nor increase the risk to people, property, crops or livestock from all forms of flooding'. Reference to sewer flooding should also be made in supporting text.</p>	Agreed with slight changes for clarity and readability.	<p>Amendment to Policy WAT1</p> <p>II. <u>Development proposals should neither increase the likelihood or intensity of any form of flooding, nor increase the risk to people, property, crops or livestock from such events, both on site and to neighbouring land.</u></p> <p>Amendment to text (para 23.2.1)</p> <p>The Council will resist any development which has the potential to contribute to <u>any form of flooding, including sewer flooding,</u> risk and has adverse impacts on river channel stability or damage to wildlife habitats.</p>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
Water Quality and the Water Environment				
23.13	23.3	The River Mimram has been subject to conservation work which should not be impacted upon by new development.	Policy WAT2 states that development proposals will be required to preserve and enhance the water environment including all watercourses.	No amendment in response to this issue
23.14	23.3.1	HCC Ecology suggest that reference should be made to the importance of river corridors as ecological and landscape corridors in both urban and rural areas and to the fact that the rivers are chalk stream habitats and are of particular ecological value. Last sentence should read 'biodiversity and ecological processes affecting wildlife'.	Paragraph 23.3.5 acknowledges the importance of waterways with regards to acting as wildlife habitats. Proposed amendment to last sentence of paragraph 23.3.1 is agreed.	Amendment to text (para 23.3.1) ...which in turn can impact biodiversity and the ecological habitats of <u>processes affecting</u> wildlife
23.15	23.3.2	Support from HCC Ecology	Support noted and welcomed	No amendment in response to this issue
23.16	23.3.2	The Environment Agency states that only the River Ash (from its source to the River Hadham) is at good status while all other waterbodies are failing. Development proposals should take account of this to comply with the Water Framework Directive.	Noted. The paragraph states that the Council will need to work with the Environment Agency and other partners to address the objectives of the Water Framework Directive. <u>Instead of just referring to the one river that has good status, the Council should endeavour for all waterways to reach 'good' status.</u>	Amendment to text (para 23.3.2) Few of the rivers within East Herts, only the River Ash is are currently at 'Good' ecological status/potential as set out in the Thames River Basin Management Plan.... East Herts Council will <u>continue to</u> work with the Environment Agency and other partners to address the objectives of the Water Framework Directive through the relevant actions identified in the <u>Thames</u> River Basin Management Plan and River Catchment Management Plans for individual watercourses <u>across the</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				<u>District in order to continuously improve their water quality.</u>
23.17	23.3.4	Environment Agency supports this paragraph but suggest the wording could be included within policy.	Agreed	<p>Amendment to text (para 23.3.4) and new Policy</p> <p><u>Source Protection Zones (SPZs) exist around abstraction points for potable (drinking) water. In source protection zones (SPZs), development proposals for any of the uses identified in Policy WAT2 will be required to submit an assessment of potential impacts and any mitigation measures required.</u></p> <p><u>WAT2: Source Protection Zones</u></p> <p><u>In Source Protection Zones (SPZs), development proposals for any of the following uses will be required to submit an assessment of potential impacts and any mitigation measures required:</u></p> <ul style="list-style-type: none"> • <u>Incinerators</u> • <u>Waste transfer stations</u> • <u>Vehicle dismantlers</u> • <u>Metal recycling</u> • <u>Waste treatment facilities and all other non landfill waste management activities</u> • <u>Cemeteries</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				<ul style="list-style-type: none"> • <u>Discharge of foul sewerage to ground</u> • <u>Cess pools</u> • <u>Waste sites and underground storage of hazardous substances (i.e petrol stations)</u> • <u>New trade effluent discharges or stores</u> • <u>Storage of manure, slurry, sewage sludge and other farm waste</u>
23.18	WAT2	Support for policy including from HCC Ecology. Degraded rivers should be restored through softening of river margins and reinstatement of green buffer strips, reflecting the objectives of the relevant Catchment Management Plan.	Support noted and welcomed.	No amendment in response to this issue
23.19	WAT2 Part I	Environment Agency state that specific reference should be made to groundwater.	Agreed	Amendment to Policy WAT2 I. ...and the ecological value of watercourses and their margins <u>and the protection of groundwater.</u>
23.20	WAT2 Part II	<p>The Canal and River Trust object to the suggestion that a buffer zone should be provided where possible adjacent to waterways. Each application should be considered on its merits. Integration of rivers with developments is sometimes more desirable than screening.</p> <p>The width of an appropriate buffer strip for ordinary</p>	It is considered that the creation of suitable buffers between watercourses and new development is the most effective way of ensuring the protection of the water environment. This approach has the support of the Environment Agency. The width of an appropriate buffer strip for ordinary watercourses will vary depending on the nature	Amendment to Policy WAT2 II. <u>Unless there is clear justification for not doing so,</u> an undeveloped buffer strip at least 8 metres wide should be maintained alongside all main rivers, and an appropriate buffer strip should be maintained at ordinary watercourses. <u>Any</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
		<p>watercourses should be defined.</p> <p>Environment Agency strongly supports this part of the policy but indicate that a new second sentence could be inserted to say 'Any barriers to this should be clearly justified'. Lee Valley Regional Park Authority state that the policy should state that the buffer strips are to be maintained for the purposes of maximising ecological benefits and that development proposals will need to include an appropriate management scheme for the buffer areas.</p>	<p>of the watercourse and the surrounding environment. This issue should therefore be dealt with on a case by case basis.</p> <p>Proposed amendments from the Environment Agency and the Lee Valley Regional Park Authority are accepted with slight text amendments.</p>	<p><u>development proposals should include an appropriate management scheme for buffer strips.</u></p>
Efficient Use of Water Resources				
23.21	23.4	<p>The chapter should seek to ensure that water supply is adequate to meet additional pressure from new developments without damaging aquifers and streams.</p>	<p>This issue is addressed by Water Resources Management Plans (WRMP) prepared by the water companies. WRMPs are approved by the Secretary of State. This section of the chapter seeks to ensure efficient use of water resources. The Council will continue to engage with the relevant water providers in order to reduce the risk of damage to the environment from growth and development.</p>	<p>No amendment in response to this issue</p>
23.22	23.4	<p>There is not enough water in the area. Water meters will not solve the problem. Additional development will be an additional drain and could result in the destruction of the chalk river bed environment.</p>	<p>This issue is addressed by Water Resources Management Plans (WRMP) prepared by the water companies. WRMPs are approved by the Secretary of State. This section of the chapter seeks to ensure efficient use of water resources. The Council will continue to engage with the relevant water providers in order to reduce the risk of damage to the environment from growth and development.</p>	<p>No amendment in response to this issue</p>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
23.23	WAT3	Policy must apply equally to infilling, not just new development so that flood risk in Stanstead Abbotts is not increased.	The policy applies to all forms of development including infilling.	No amendment in response to this issue
23.24	WAT3	Approval of development proposals should be linked to availability of water taking account of measures to reduce consumption. This contrasts to WAT5 where adequate capacity must be provided.	This issue is addressed by Water Resources Management Plans (WRMP) prepared by the water companies. WRMPs are approved by the Secretary of State. This section of the chapter seeks to ensure efficient use of water resources. The Council will continue to engage with the relevant water providers in order to reduce the risk of damage to the environment from growth and development.	No amendment in response to this issue
23.25	WAT3	Does this policy apply to all residential development?	The policy applies to all forms of development.	No amendment in response to this issue
23.26	WAT3	Bishop's Stortford North Consortium considers that this policy should be reviewed following Ministerial Statement on 6 th March concerning including sustainability standards within Building Regulations. Change 'Would meet' to 'Will meet'	A Ministerial Statement on 13 th March 2014 indicated that the Government will be seeking to incorporate sustainability standards within Building Regulations. However, the current situation is uncertain. The Council will therefore monitor the situation on an ongoing basis and react to any changes when they occur. Agree on second amendment.	Amendment to Policy WAT3 c) Designing residential development so that mains water consumption will meet a target of 105 litres or less per head per day.
23.27	WAT3	The Environment Agency strongly supports this policy. Water consumption could be reduced through retrofitting and an awareness campaign. Support also from Thames Water.	Support noted and welcomed.	No amendment in response to this issue
Sustainable Drainage				

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
23.28	23.5.1	The list should be amended to reflect all SuDS benefits including reducing flood risk, providing additional biodiversity and reducing pollution of watercourses. The heat island effect may also be reduced by greater use of green roofs.	It is considered that paragraph 23.5.2 and Table 23.1 adequately identify these benefits.	No amendment in response to this issue
23.29	Table 23.1	Support including from Environment Agency and HCC Ecology.	Support noted and welcomed	No amendment in response to this issue
23.30	23.5.3	Support	Support noted and welcomed	No amendment in response to this issue
23.31	WAT4	Support including from Environment Agency and Thames Water.	Support noted and welcomed.	No amendment in response to this issue
23.32	WAT4	Policy must apply equally to infilling, not just new development so that flood risk in Stanstead Abbotts is not increased.	The policy applies to all forms of development including infilling.	No amendment in response to this issue
Wastewater Infrastructure				
23.33	23.6	Support	Support noted and welcomed	No amendment in response to this issue
23.34	23.6	Additional provision needs to be made for wastewater treatment given the scale of growth in the region. Wastewater, much of which was abstracted from the chalk aquifer locally, gets treated and ends up flowing into the Thames. Hertfordshire suffers from over-abstraction.	This issue is addressed by Water Resources Management Plans (WRMP) prepared by the water companies. WRMPs are approved by the Secretary of State. The Council will continue to engage with the relevant water providers in order to reduce the risk of damage to the environment from growth and development.	No amendment in response to this issue

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
23.35	23.6.1	Support	Support noted and welcomed	No amendment in response to this issue
23.36	23.6.3	Support from HCC Ecology for the recognition that Rye Meads STW lies partly within a highly sensitive environment of international ecological importance.	Support noted and welcomed	No amendment in response to this issue
23.37	WAT5	<p>Support from Thames Water although they have suggested an additional paragraph within the supporting text to Policy WAT5:</p> <p>‘The local planning authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements are programmed by Thames Water, the Local Planning Authority will require the developer to provide appropriate improvements that must be completed prior to occupation of the development’.</p>	Agreed	<p>Replacement text for Paragraph 23.6.4</p> <p><u>East Herts Council will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements are programmed by the waste water treatment company, East Herts will require the developer to provide appropriate improvements that must be completed prior to occupation of the development. Unless special circumstances apply, this requirement is unlikely to apply to minor and</u></p>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
				<u>householder development.</u>
23.38	WAT5	Stevenage Borough Council supports the pro-active approach to identification of infrastructure. The Rye Meads Water Cycle Strategy (2009) was based on the East of England Plan housing figures. The Council would welcome the opportunity to update it.	Support noted and welcomed. It is agreed that discussions should be had with neighbouring authorities regarding the possibility of updating the Rye Meads Water Cycle Strategy.	No amendment in response to this issue
23.39	WAT5	The Environment Agency supports this policy.	Support noted and welcomed	No amendment in response to this issue
23.40	WAT5	<p>Lee Valley Regional Park Authority seek the following changes to Policy WAT5:</p> <p>Part I replace 'in tandem with' with 'in advance of'.</p> <p>Part II. Upgrade and expansion of existing, or provision of new, waste water treatment infrastructure will be supported provided that:</p> <ul style="list-style-type: none"> a) It utilises best available techniques b) It does not have an adverse effect on the integrity of Special Protection Areas, Ramsar sites and Special Areas of Conservation either alone or in combination with other projects and plans, and c) A strategy to meet relevant national and European environmental standards can be demonstrated. 	<p>For cashflow reasons infrastructure is rarely delivered in advance of development. The current wording provides a suitable balance between conveying the requirement for infrastructure to be phased appropriately without introducing unrealistic expectations about advance provision.</p> <p>Agree with changes to Part II</p>	<p>No amendment to Part I in response to this issue.</p> <p>Proposed amendment to Part II:</p> <p><u>II. Upgrade and expansion of existing, or provision of new, waste water treatment infrastructure will be supported provided that:</u></p> <ul style="list-style-type: none"> <u>a) It utilises best available techniques</u> <u>b) It does not have an adverse effect on the integrity of Special Protection Areas, Ramsar sites and Special Areas of Conservation either alone or in combination with other projects and plans, and</u> <u>a)c) A strategy to meet relevant national and European environmental standards can be demonstrated.</u>

Issue Number	Policy/ Paragraph Number	Issue	Officer Response	Proposed Amendment
General Issues				
23.41		Achievement of the aspirations in this chapter may prove difficult as it relies on organisations which have no local accountability and changing individual behaviour.	It will be necessary for the Council to work closely with infrastructure providers and other bodies, both during the preparation of the District Plan, and post adoption.	No amendment in response to this issue
23.42		Thought is needed with regards to how to retrofit these ideas to existing buildings and structures.	Noted	No amendment in response to this issue

23 Water

23.1 Introduction

- 23.1.1 Flood risk, water quality, human consumption, waste water, and the environment are all linked through the natural process of water circulation through the air, on the surface of the earth, and in the ground, known as the water cycle. Development and the built environment have significant impacts on the operation of the water cycle, and the availability and quality of water for use.
- 23.1.2 Building Futures is a Hertfordshire guide to promoting sustainability in development. It includes a 'Water' module which sets out an approach to integrated water management (IWM) which takes account of the water cycle. IWM aims to ensure that the built environment is planned and designed to function in partnership with the natural water environment, so that they can both be sustainable. IWM has a number of sub-management processes, including minimising water consumption, using and reusing alternative sources of water, managing surface water drainage, and improving water quality.

Building Futures is an interactive website which can be accessed at: www.hertslink.org/buildingfutures

23.2 Flood Risk

- 23.2.1 Water is an essential resource, but it can also be a hazard. The susceptibility of land to flooding is a material planning consideration. The Council will resist any development which has the potential to contribute to any form of flooding, including sewer flooding, and has adverse impacts on river channel stability or damage to wildlife habitats. ~~The Council will resist any development which has the potential to contribute to flood risk and has adverse impacts on river channel stability or damage to wildlife habitats.~~ The following

policies encourage an integrated water management approach to new development.

- 23.2.2 East Herts Council's Strategic Flood Risk Assessment (SFRA) contains maps showing flood risks from various sources, including river and surface water flood risk areas, and these represent a snapshot of flood risk at a given moment. The Environment Agency publishes regular mapping updates, and the latest evidence should be a material consideration in determination of planning applications.

The East Herts Strategic Flood Risk Assessment can be viewed on the Council's website at: www.eastherts.gov.uk/sfra

- 23.2.3 In order to steer new development to areas with the lowest probability of flooding, the Sequential Test, and where necessary the Exception Test will be used. For development proposals of 1 hectare or greater, or on any site within Flood Zones 2, 3a or 3b, a Flood Risk Assessment (FRA) should be submitted with the planning application. The Environment Agency's Standing Advice for applicants and their agents provides further explanation.

For more information on the Environment Agency's Standing Advice go to: www.environment-agency.gov.uk <https://www.gov.uk/flood-risk-standing-advice-frsa-for-local-planning-authorities>

Policy WAT1 Flood Risk Management

- I. The functional floodplain will be protected from inappropriate development and where possible developed flood plain should be returned to Greenfield status with an enhanced level of biodiversity.
- II. Development proposals should neither increase the likelihood of, or intensity of, any form of flooding, nor increase the risk to people,

property, crops or livestock from flooding such events, both on site and to neighbouring land.

III. In order to steer new development to areas with the lowest probability of flooding, the Sequential Test will be used. In exceptional circumstances, if developments are proposed which are required to pass the NPPF Exceptions Test, they will need to address flood resilient design and emergency planning by demonstrating that:

- (a) The development will remain safe and operational under flood conditions;
- (b) A strategy of either safe evacuation and/or safely remaining in the building is followed under flood conditions;
- (c) Key services will continue to be provided under flood conditions; and
- (d) Buildings are designed for quick recovery following a flood.

23.3 Water Quality and the Water Environment

23.3.1 The abstraction and discharge of water used in the built environment can have a detrimental impact on the quality of the local waters, which in turn can impact biodiversity and the ecological processes affecting ~~habitats of wildlife.~~

23.3.2 ~~Few of the rivers w~~Within East Herts, only the River Ash~~are~~is currently at 'Good' ecological status/potential as set out in the Thames River Basin Management Plan, which covers the Upper Lea catchment including all the rivers in East Herts. East Herts Council will continue to work with the Environment Agency and other partners to address the objectives of the Water Framework Directive through the relevant actions identified in the Thames River Basin Management Plan and River Catchment Management Plans for individual watercourses across the District in order to continuously improve their water quality. Wherever possible, an undeveloped buffer strip, with no new structures, roads or

pathways, should be left alongside all watercourses, to maximise the ecological benefits of waterways.

For more information and for the latest updates on the status of rivers in East Herts, see the Environment Agency's website at: www.environment-agency.gov.uk

23.3.3 To help prevent surface water contamination following heavy rainfall, effective drainage strategies will be required as part of an integrated water management strategy. Such strategies will encompass a range of measures addressed in policies in the District Plan, covering drainage, water infrastructure and water quality.

23.3.4 Source Protection Zones (SPZs) exist around abstraction points for potable (drinking) water. In Source Protection Zones (SPZs), development proposals for any of the following uses identified in Policy WAT2 will be required to submit an assessment of potential impacts and any mitigation measures required.:

- ~~incinerators~~
- ~~waste transfer stations~~
- ~~vehicle dismantlers~~
- ~~metal recycling~~
- ~~waste treatment facilities and all other non-landfill waste management activities~~
- ~~cemeteries~~
- ~~discharge of foul sewage to ground~~
- ~~cess pools~~
- ~~waste sites and underground storage of hazardous substances (i.e. petrol stations)~~

- ~~new trade effluent discharges or stores~~
~~storage of manure, slurry, sewage sludge and other farm waste.~~

Policy WAT2 Source Protection Zones

In Source Protection Zones (SPZs), development proposals for any of the following uses will be required to submit an assessment of potential impacts and any mitigation measures required:

- incinerators
- waste transfer stations
- vehicle dismantlers
- metal recycling
- waste treatment facilities and all other non landfill waste management activities
- cemeteries
- discharge of foul sewage to ground
- cess pools
- waste sites and underground storage of hazardous substances (i.e. petrol stations)
- new trade effluent discharges or stores
- storage of manure, slurry, sewage sludge and other farm waste.

A map of Source Protection Zones is available on East Herts Council's website at: www.eastherts.gov.uk/sourceprotectionzones

- 23.3.5 As well as providing essential water resources, the water environment, in particular the district's waterways, provide opportunities for recreation and transport, and are important wildlife habitats. The waterways provide green corridors which contribute to the physical character of the district.

Policy WAT32 Water Quality and the Water Environment

I. Development proposals will be required to preserve and enhance the water environment, ensuring improvements in surface water quality and the ecological value of watercourses and their margins and the protection of groundwater.

II. Unless there is clear justification for not doing so, An undeveloped buffer strip at least 8 metres wide should be maintained alongside all main rivers, and an appropriate buffer strip should be maintained at ordinary watercourses. Any development proposals should include an appropriate management scheme for buffer strips.

III. Opportunities for removal of culverts, river restoration and naturalisation should be considered as part of any development adjacent to a watercourse. Additional culverting and development of river corridors will be resisted.

23.4 Efficient Use of Water Resources

- 23.4.1 East Hertfordshire lies within one of the most water-stressed areas of the East of England, which is itself one of the most water-stressed regions of the country. Abstraction for human consumption can impact on the water environment, for example contributing to low river levels. Installation of water efficient fixtures and fittings is a cost-effective way to reduce water consumption at new development. Dual-flush toilets and water butts for garden use are two examples, although

there are many other simple and low-cost measures which are potentially available to developers.

- 23.4.2 Between 2007 and 2012 the average resident of East Herts consumed 160 litres/day. This compares with the national average of 150 litres/day over the same period. Projections for population growth in East Herts and the wider south-east will mean that over the plan period, new strategic water resources will be required.
- 23.4.3 East Hertfordshire forms part of the water supply grid encompassing Hertfordshire, Bedfordshire, and parts of Essex, managed by a number of water supply companies. Water supply is the subject of a national policy debate about the configuration of the water industry and consumer pricing, water metering, leakage reduction and many other issues in this nationally regulated industry. Water supply companies are required to demonstrate how they will meet these national standards in their Water Resources Management Plans, which are published every five years.
- 23.4.4 East Herts will continue to explore the role that local policy can play in contributing to the ultimate goal of water neutrality. Cost-effective measures such as the requirement for water efficient fixtures and fittings at new development can make a significant contribution over the next twenty years. The Council will continue to work with partners to encourage the sustainable and responsible abstraction of water. These measures can have significant environmental benefits for the district's rivers. Assessments of residential water consumption should be submitted using the Building Research Establishment (BRE) Code for Sustainable Homes Water Calculator or other appropriate method by prior agreement with the Council.

For more information on the Code for Sustainable Homes Water Calculator go to the Building Research Establishment's Website at: www.breeam.org

Policy WAT43 Efficient Use of Water Resources

Development must minimise the use of mains water by:

- (a) Incorporating water saving measures and equipment;
- (b) Incorporating the recycling of grey water and utilising natural filtration measures where possible;
- (c) Designing residential development so that mains water consumption ~~will~~ould meet a target of 105 litres or less per head per day.

23.5 Sustainable Drainage

23.5.1 Sustainable Urban Drainage systems (SUDS) mimic natural drainage from a site and enable rainwater to run back into natural systems, rather than the stormwater drainage network. SUDS also treat run-off water to remove pollutants. This can have multiple benefits:

1. increased recharge of groundwater and aquifers
2. reduced runoff into the sewer system (resulting in reduced energy and chemical costs of treatment)
3. improved groundwater quality via natural infiltration
4. reduced degradation of chalk stream habitats

23.5.2 Depending on the type of drainage techniques used, there can be flood reduction benefits, pollution control benefits, and landscape and wildlife benefits. When selecting appropriate drainage techniques, it is important to try to maximise the number of benefits, and to prioritise the most sustainable approaches. These can be set out in the form of

a hierarchy. The SUDS hierarchy contained within the Council's SFRA is shown below:

Table 23.1 Sustainable Urban Drainage Hierarchy

Table 23.1 Sustainable Urban Drainage Hierarchy			
SUDs Technique	Flood Reduction	Pollution Reduction	Landscape and Wildlife Benefit
Most Sustainable			
Living Roofs	√	√	√
Basins and Ponds			
Constructed wetlands			
Balancing ponds	√	√	√
Detention basins			
Retention ponds			
Filter Strips and Swales	√	√	√
Infiltration Devices			
Soakaways	√	√	√
Infiltration trenches and basins			
Permeable Surfaces and Filter Drains			
Gravelled surfaces	√	√	
Solid paving blocks			

Porous paviers			
Tanked Systems			
Over-sized pipes/tanks	√		
Storm cells			
Least Sustainable			

23.5.3 The sustainable drainage hierarchy is intended to ensure that all practical and reasonable measures are taken to manage surface water higher up in the hierarchy and that the amount of surface water managed at the bottom of the hierarchy is minimised. The hierarchy is also relevant to paving of front gardens, where the cumulative impact of impermeable paving on run-off rates may be considerable.

23.5.4 There are many practical issues of design, installation and maintenance in the implementation of effective SUDS. The Flood and Water Management Act 2010 requires upper tier authorities to set up a Sustainable Urban Drainage System (SUDS) Approving Body or ‘SAB’ to:

1. Evaluate and approve SUDS proposals for new development or redevelopment where construction work would have drainage implications, and
2. Adopt and maintain SUDS on schemes that meet the evaluation criteria set out in the National SUDS Standards.

23.5.5 It is expected that the drainage aspects of policy will become the responsibility of the County Council, as such, the focus of the East Herts policy will shift from drainage management to the environmental and amenity aspects of drainage schemes. Hertfordshire County Council has produced an Interim SUDS Policy Statement (November 2012) which sets

out proposed requirements. It is possible that some developments (especially smaller sites) could be offered to East Herts District Council for adoption.

For more information on Hertfordshire County Council's approach as SUDs Approval Body go to: www.hertsdirect.org

Policy WAT54 Sustainable Drainage

I. Development must utilise the most sustainable forms of drainage systems in accordance with the SUDS hierarchy, unless there are practical engineering reasons for not doing so.

II. Development should aim to achieve Greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

III. Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation. The provision of balancing ponds as part of an area of public open space for recreation or wildlife should be designed to ensure the safety of other users of the space. Where SUDs are provided as part of a development, applicants should detail how it will be maintained in the long term.

IV. Where practicable, SUDS should be designed to ensure the sustainable drainage networks have the additional capacity required to cope with infrequent adverse weather conditions and therefore reduce flood risk.

23.6 Wastewater Infrastructure

23.6.1 Effective wastewater infrastructure is fundamental to sustainable urban life and therefore investment and expansion are required. There are a number of Sewage Treatment Works (STWs) in the district, notably at Bishop's Stortford, Buntingford, and at Rye Meads in the far south of

the district. Bishop's Stortford and Rye Meads STWs serve not only East Herts but also settlements within the catchment but outside the district.

23.6.2 Like water supply, waste water treatment is a nationally regulated industry and water quality standards for treatment discharge are balanced with other regulatory issues including consumer water pricing through the water companies' Asset Management Plans, which are updated every five years.

23.6.3 Rye Meads STW lies within a highly sensitive ecological environment, adjacent to a Site of Special Scientific Interest, Ramsar Site and Special Area of Conservation. East Herts Council will work with the waste water treatment company and other Local Planning Authorities in the Rye Meads catchment area, in accordance with the Duty to Co-operate, to ensure that adequate capacity can be found at Rye Meads, or that alternative waste water treatment options can be identified.

23.6.4 East Herts Council will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements are programmed by the waste water treatment company, East Herts will require the developer to provide appropriate improvements that must be completed prior to occupation of the development. Unless special circumstances apply, this requirement is unlikely to apply to minor and householder development. ~~Additional waste water treatment infrastructure~~

~~and upgrades to existing facilities will be required in the district over the plan period, and this will be monitored through the Infrastructure Delivery Plan process. Developers of major sites, including allocated sites and sites identified in the Strategic Housing Land Availability Assessment (SLAA), should work with the waste water treatment company to ensure that adequate capacity in wastewater infrastructure is available. This is likely to require understanding of demands on infrastructure from other development sites in the catchment. Unless special circumstances apply, this requirement is unlikely to apply to minor and householder development.~~

- 23.6.5 East Herts Council will work with Stansted Airport, the waste water treatment company, and the Environment Agency to ensure that any fuel discharges from the airport are safely treated and do not compromise the quality of the District's water courses or groundwater.

Policy WAT65 Wastewater Infrastructure

I. Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development.

II. Upgrade and expansion of existing, or provision of new, waste water treatment infrastructure will be supported provided that:

(a) It utilises best available techniques, and provided that

(b) It does not have an adverse effect on the integrity of Special Protection Areas, Ramsar Sites and Special Areas of Conservation either alone or in combination with other projects and plans, and

(c) a strategy to meet relevant national and European environmental standards can be demonstrated.

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Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Introduction				
24.1	24.1.1	Support from HCC for the recognition that pollution control is important and that light pollution in particular can have a negative impact on wildlife.	Support noted and welcomed.	No amendment in response to this issue
Contaminated Land and Land Instability				
24.2	EQ1	Contaminated land should not be used for house building as there is not sufficient technology to stop leakage. If allowed, the fact the house is on contaminated land should be disclosed to subsequent owners and ongoing testing of contamination should be carried out.	Land can be remediated and used for new purposes. Policy EQ1 states that the Council will require evidence to indicate that the land can be successfully remediated.	No amendment in response to this issue
24.3	EQ1	The Environment Agency supports the policy but suggest that a new sentence is added to either the policy or supporting text to say: 'Competence would be demonstrated by conforming to the requirements of 'BS10175: Code of Practice for the Investigation of Potentially Contaminated Sites'	The document is not readily available on the internet without paying a significant purchase price. It is therefore considered inappropriate to include a link in the District Plan to this document. The policy does state that the developer shall carry out an 'adequate investigation' to inform a risk assessment and it is considered that this requirement is sufficient.	No amendment in response to this issue
Noise Pollution				
24.4	EQ2	Stansted Airport Ltd state that development should be limited/mitigated within the airport's 57dB Leq (16hr day) contours and not permitted beyond the 66dB Leq (16hr day) contours. STAL would welcome discussions on an amended policy.	It is considered that the issue of aircraft noise should be considered on a site by site basis dependent on the location and nature of development proposals.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Light Pollution				
24.5	EQ3	Support from Canal & Rivers Trust and the Environment Agency	Support noted and welcomed	No amendment in response to this issue
24.6	EQ3	It would be good to include a statement about lighting being switched off when not required. There are floodlights that are left on all night and cause considerable light pollution.	It is considered that this issue is adequately addressed by the policy and supporting text.	No amendment in response to this issue
24.7	EQ3	HCC state that the policy should include a statement to the effect that the Council will have regard to the 'Guidance Notes for the Reduction of Obtrusive Light' produced by the Institution of Lighting Professionals.	Agreed.	<p>Amendment to text (para 24.4.2):</p> <p>...Schemes will be considered against the latest national guidance and lighting standards <u>including the 'Guidance Notes for the Reduction of Obtrusive Light (2011)'</u>.</p> <p>New 'orange box'</p> <p>Guidance Notes for the Reduction of Obtrusive Light (2011) can be accessed on the website of the Institution of Lighting Professionals here: https://www.theilp.org.uk/documents/obtrusive-light/</p>

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Air Quality				
24.8	24.5.3	Section 24.5 should be augmented to highlight the full severity of the air quality issue. The SA states that the proposed development would have significant negative effects on traffic congestion in Hertford. Public Health England states that there are more deaths from particulate air pollution in Hertfordshire than anywhere outside of London. With the presence of an AQMA, the situation in Hertford is likely to match or exceed these levels.	It is considered that Policy EQ4 and the supporting text adequately highlight the issue of air quality and the ways in which the issue should be addressed through development proposals.	No amendment in response to this issue
24.9	EQ4	Thames Water state that the policy should be expanded to ensure that development does not only impact on air quality but also that proposed development and land uses should not be affected by existing uses unless suitable mitigation can be provided.	The purpose of Policy EQ4 is to ensure that regard is had to air quality issues.	No amendment in response to this issue
General Issues				
24.10		Natural England indicates that there is little reference to soils, geodiversity and the best and most versatile agricultural land. Decisions on development should take account of the impact on soils. Paragraphs 109 and 112 of the NPPF refer to the conservation and sustainable management of soils. The Council must ensure that it has access to Agricultural Land Classification maps to inform decision making. There is also a Code of Practice produced by Defra which advises on protecting soil resources during construction.	As the representation indicates, the NPPF contains provisions for the conservation of soil resources and the best and most versatile agricultural land. It is therefore not considered necessary to repeat this within the District Plan.	No amendment in response to this issue

Other Proposed Amendments

Location/ Paragraph/Policy	Issue	Proposed Amendment
24.3.2	Not only are the airports a key source of noise pollution, but also the M11 and the increase in traffic movement related to an increased level of flights at Stansted Airport will make these issues worse.	<p>Amendment to text (para 24.3.2):</p> <p>One of the most common causes of noise pollution is from traffic noise. In East Herts the proximity of both Luton and Stansted Airports to the district has a specific impact which needs to be taken into account when development proposals are considered. <u>The M11 is the main motorway serving Stansted Airport followed by the A120. Any increase in activity associated with the airport will subsequently increase the level of traffic on surrounding roads, exacerbating the potential for noise pollution.</u></p>
Policy EQ2	The policy on noise pollution also needs to refer to the impacts on human health through noise pollution.	<p>Amendment to Policy EQ2</p> <p>I. Development should be designed and operated in a way that minimises the direct and cumulative impact of noise on the surrounding environment. Particular consideration should be given to the proximity of noise sensitive uses, <u>and in particular, the potential impact of development on human health.</u></p>
24.5.4	Paragraph needs to be amended to reflect changes made to paragraph 22.4.5	<p>Amendment to text (para 24.5.4):</p> <p>Some renewable forms of energy used for heating may also, cumulatively or in isolation, result in a rise in particulates which can be harmful to human health. For this reason such technologies will not be permitted within or near the urban areas of settlements. <u>In line with Policy DES1, the Council will expect proposals to embrace renewable, zero and low-carbon technology to fulfil some, if not all, of the expected energy use of the proposed development. Where proposals are within or near the urban areas of settlements, applications should be supported by an air quality assessment, which details proposed mitigation measures where necessary.</u></p>

24 Environmental Quality

24.1 Introduction

24.1.1 The control of pollution is critical to achieving the District Plan's strategic objectives by promoting healthy lifestyles and an enhanced quality of life for residents and visitors to the district. Pollution control through development also plays a significant role in planning for climate change and working in harmony with the environment to conserve natural resources and increase biodiversity.

24.1.2 Proposals for all types of development must therefore take into account nearby land uses to ensure that the right development is located in the right place across the district, in order to safeguard the quality of the environment. Policies relating to water quality and water pollution are contained within Chapter 23: Water.

24.2 Contaminated Land and Land Instability

24.2.1 Land may be contaminated and/or unstable for a number of reasons, such as previous commercial use or use as a landfill site. Such land can be re-used for new purposes but special remedial measures may be needed to reduce hazards arising from the previous use, and new buildings may need to be specially designed. Developers are responsible for ensuring that unacceptable risks from contamination and land instability are not present on site. If necessary, any risks will be successfully addressed through the remediation of contaminated land without undue environmental impact during and following the development.

24.2.2 When considering proposals for development, regard will be given to the Council's most recent Contaminated Land Strategy.

For more information on the Council's Contaminated Land Strategy go to: www.eastherts.gov.uk/envhealth

Policy EQ1 Contaminated Land and Land Instability

I. The District Council will encourage the remediation of contaminated land to ensure that land is brought back into use, subject to the requirements of this policy.

II. The Council will require evidence, as part of any application, to show that unacceptable risks from contamination and land instability will be successfully addressed through remediation without undue environmental impact during and following the development. In particular, the developer shall carry out an adequate investigation to inform a risk assessment.

III. Where necessary, appropriate monitoring procedures to be undertaken prior, during and post remediation will be agreed with the developer/applicant. This should be set out in a verification report.

24.3 Noise Pollution

24.3.1 The impact of noise on the environment can be detrimental to health and quality of life. There is therefore a need to control the introduction of noise sources into the environment, as well as ensuring that new noise sensitive development is located away from existing sources of significant noise.

24.3.2 One of the most common causes of noise pollution is from traffic noise. In East Herts the proximity of both Luton and Stansted Airports to the district has a specific impact which needs to be taken into account when development proposals are considered. The M11 is the main motorway serving Stansted Airport followed by the A120. Any increase in activity associated with the airport will subsequently increase the level of traffic on surrounding roads, exacerbating the potential for noise pollution.

24.3.3 Noise can also affect the tranquillity of an area. Tranquillity is a key characteristic of the natural environment. Tranquil spaces, often located within the more rural parts of the district, play a multi functional role as part of the district's green infrastructure network. They attract visitors, improve health and wellbeing by offering a place to relax and exercise, provide a haven for wildlife and improve biodiversity and enhance the character and identity of a place. These areas will be protected from noise pollution to ensure that areas defined by their tranquillity are protected from development that generates noise.

24.3.4 Where new noise generating development such as industrial and commercial and outdoor sport and recreation uses are proposed, it is expected that they will be located at an appropriate distance away from noise sensitive development i.e. residential areas, schools and hospitals.

Policy EQ2 Noise Pollution

I. Development should be designed and operated in a way that minimises the direct and cumulative impact of noise on the surrounding environment. Particular consideration should be given to the proximity of noise sensitive uses, and in particular, the potential impact of development on human health.

II. Noise sensitive development should be located away from existing noise generating sources or programmed developments where possible to prevent prejudicing the continued existing operations. The use of design, layout, landscaping tools and construction methods should be employed to reduce the impact of surrounding noise sources.

24.4 Light Pollution

24.4.1 Light pollution can cause sleep disturbance and annoyance and is caused by the brightening of the night sky over inhabited areas and excessive brightness from light causing high levels of glare. Dark night skies are important for health

and wellbeing, and for the conservation of natural habitats and the behaviour of nocturnal animals and birds.

- 24.4.2 In addition to impacting upon human health and natural habitats, light pollution is a sign of wasted energy from excessive lighting. Lighting at night in commercial areas is often used for security and to increase visual prominence. Lighting schemes must therefore be designed carefully as part of the overall development proposal to prevent light spillage and glare and to represent the minimum necessary for commercial and security purposes. Schemes will be considered against the latest national guidance and lighting standards- including the 'Guidance Notes for the Reduction of Obtrusive Light (2011)'.

Guidance Notes for the Reduction of Obtrusive Light (2011) can be accessed on the website of the Institution of Lighting Professionals here: <https://www.theilp.org.uk/documents/obtrusive-light/>

Policy EQ3 Light Pollution

I. External lighting schemes must:

- (a) Not have an unacceptable adverse impact on neighbouring uses or the wider landscape;
- (b) Be the minimum required for security and operational purposes;
- (c) Minimise the potential glare and spillage;
- (d) Minimise harm to the amenity of residents and road users and prevent impacts on the local ecology.

II. Where appropriate, the District Council will seek to control the times of illumination.

24.5 Air Quality

- 24.5.1 Clean air is critical to health and wellbeing and quality of life and is also crucial to support habitats and biodiversity. The nature of the district, with its dispersed towns, villages and hamlets with poor inter-connectivity by passenger transport, relative affluence and mobility, high car-ownership and close proximity to London and larger towns and cities, all contribute to higher levels of greenhouse gas emissions per person than neighbouring districts.
- 24.5.2 The historic nature and organic growth of the district's principle towns of Bishop's Stortford, Hertford and Ware have in themselves led to inefficient road and transport networks and where these issues coincide with limited connections to major roads, congestion is inevitable. Such congestion can result in high levels of localised pollutants which can cause problems for those with respiratory conditions.
- 24.5.3 Bishop's Stortford in particular suffers from this issue; the combination of the historic road network combined with its proximity to Stansted Airport means that the town centre frequently suffers from congestion and the resultant poor air quality. As such an Air Quality Management Area (AQMA) has been established in the town centre (at Hockerill Lights) to monitor levels of pollutants. There is also an AQMA in Hertford (at the Mill Road/A414 roundabout), and in London Road, Sawbridgeworth. These monitoring sites are supported by action plans to improve air quality in these locations. The Council also produces regular update and screening assessments and progress reports for the whole district and regular assessments on each AQMA.

More information on Air Quality Management Areas can be found on the Council's Website at www.eastherts.gov.uk/envhealth.

- 24.5.4 ~~Some renewable forms of energy used for heating may also, cumulatively or in isolation, result in a rise in particulates~~

~~which can be harmful to human health. For this reason such technologies will not be permitted within or near the urban areas of settlements. The Council will support proposals for renewable forms of energy used for heating. Where proposals are within or near the urban areas of settlements, applications should be supported by an air quality assessment. In line with Policy DES1, the Council will expect proposals to embrace renewable, zero and low-carbon technology to fulfil some, if not all, of the expected energy use of the proposed development. Where proposals are within or near the urban areas of settlements, applications should be supported by an air quality assessment, which details proposed mitigation measures where necessary.~~

Policy EQ4 Air Quality

I. Development and land uses should minimise potential impacts on local air quality both during construction and operation including the operation of heating, cooling and extraction units.

II. Development within designated Air Quality Management Areas (AQMAs), or development which may have an impact on these areas, must have regard to the Council's latest strategy and action plan for the reduction of pollutants in the defined catchment, maintaining acceptable levels of air quality. Evidence of mitigation measures will be required.

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
Introduction				
25.1	25.1.1	The paragraph is too vague. It should specify who is responsible for what. There is no evidence of involvement and commitment from housing and infrastructure providers. The District Council only has limited power to ensure the providers play their part which is a weakness of the plan.	An Infrastructure Delivery Plan is currently being prepared which identifies key infrastructure requirements including who will deliver specific schemes, how much they will cost and where funding may come from. The Council will continue to work with neighbouring local authorities and other organisations under the auspices of the 'Duty to Co-operate' in order to ensure that any strategic issues are resolved. In order for the District Plan to be found 'sound' at Examination, the Council must allocate sites for development that are deliverable in the first five years of the plan period and be confident that, beyond the first five years, other sites will come forward at a specific point in time.	No amendment in response to this issue
Infrastructure and Service Delivery				
25.2		The Police and Crime Commissioner for Hertfordshire states that an increase in population leads to greater pressure on the Police service. Economic growth also means that there is a greater stock of premises to police. The level of growth envisaged for the Gilston Area will have significant implications for policing. Additional demands will have to be met through contributions from developers via the Community Infrastructure Levy, or site specific planning obligation payments. The following cost requirements for additional infrastructure arising from the proposed	It is recognised that the level of growth proposed will impact on services and facilities in the District. The Council will continue to work with service providers including Hertfordshire Police in order to ensure that sufficient contributions are made, either through S106 or CIL, to mitigate this impact and to help fund strategic infrastructure projects identified within the IDP.	No amendment in response to this issue

Issue Number	Policy/Paragraph Number	Issue	Officer Response	Proposed Amendment
		<p>level of growth have been identified:</p> <p>2016-2021: £500,000</p> <p>2021-2026: £125,000</p> <p>2026-2031: £125,000</p> <p>Post 2031: £3,000,000</p>		
25.3	DEL1	HCC Ecology and HCC Property support the policy, and in particular the recognition of partnership working. Support also received from the Lee Valley Regional Park Authority. Thames Water supports the policy and states that it is important that developers demonstrate that adequate wastewater capacity can be provided in tandem with development.	Support noted and welcomed.	No amendment in response to this issue
25.4	DEL1	Stevenage Borough Council states that a third of the housing target is to be met by the three Broad Locations. There is uncertainty as to whether these sites could be delivered. A relatively small scale scheme of 500 to 1,000 dwellings east of Stevenage could make a positive contribution to medium term requirements and provide greater flexibility and certainty within the plan.	Ongoing work in support of the District Plan currently indicates that the three Broad Locations: East of Welwyn Garden City, North and East of Ware and the Gilston Area are the most sustainable locations for strategic levels of growth. However, the Council will continue to assess the potential of other locations, including the area to the east of Stevenage, in order to ensure that the Plan presents the most appropriate strategy for the District.	No amendment in response to this issue
25.5	DEL1	The timetable for the delivery of the IDP must be provided.	The IDP is being prepared to support ongoing work on the District Plan and will be completed ahead of the Examination in Public.	No amendment in response to this issue
25.6	DEL1	Green Infrastructure should be included within the IDP alongside conventional 'grey' infrastructure.	Agreed. The IDP will identify strategic green infrastructure schemes.	No amendment in response to this issue

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25.7	DEL1	The Highways Agency wish to be involved with the preparation of the IDP. Further modelling work is required to identify, at an early stage, the likely extent and location of required mitigation measures which will help secure funding at an early stage. There is a concern that sites have been identified as preferred options without more detailed transport evidence. It should not be assumed that the Agency will be able to fund any schemes that are not already committed.	The preparation of the District Plan is an ongoing iterative process. East Herts are working closely with Hertfordshire and Essex County Councils in order to further understand the potential impacts of growth, both within East Herts and neighbouring authorities, on the local and strategic highway network. Required mitigation measures will then be identified within the IDP. The Highways Agency will be involved in this process.	No amendment in response to this issue
25.8	DEL1	Essex County Council wish to be included as one of the partners with whom East Herts works to ensure the delivery of school places for the planned development in the Gilston Area.	Noted. East Herts will continue to work closely with ECC and other organisations as the District Plan progresses and beyond to ensure the deliverability of key infrastructure schemes and services.	No amendment in response to this issue
Developer Contributions				
25.9	DEL2	HCC Property supports the policy and states that the ability to mitigate new development should not be limited to planning obligations given the restrictions which will be introduced in 2015. The Environment Agency are supportive of the inclusion of nature conservation, landscaping improvements and flood mitigation within the policy.	Support noted and welcomed.	No amendment in response to this issue
25.10	DEL2	The policy refers to CIL but the Council has not yet made a decision regarding whether to introduce CIL or not. The opportunity for seeking funding after April 2015 when S106 will be scaled back will be minimal if CIL isn't in place.	Consultants have been commissioned to undertake a Delivery Study in support of the ongoing work on the District Plan. Part of the remit of the study is to identify a viable CIL charging schedule. The Council will then be able to come to a decision as to whether to implement CIL or not.	No amendment in response to this issue

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25.11	DEL2	Developers should provide contributions toward the betterment of communities they are enlarging. There must be specific benefit to local communities and not just a pot of money that is used as the District or County Councils see fit. A mechanism for communities to reclaim developer contributions should be included.	Through the use of planning obligations developers are required to make financial contributions in order to make a development acceptable in planning terms. This often involves the provision of new or enhanced services, facilities and infrastructure which directly benefits the local communities that are affected. While a decision has not yet been made regarding the implementation of CIL, if the Council decided to pursue that mechanism of funding, then a percentage of contributions would be passed down to Town and Parish Councils to use as they see fit.	No amendment in response to this issue
25.12	DEL2	<p>When preparing a CIL charging schedule the Council should avoid:</p> <ul style="list-style-type: none"> - Double charging through use of both CIL and S106 - Using CIL for items of infrastructure that are to be delivered directly by developers. - Failing to recognise that where direct provision is made on site, or land is provided for infrastructure at nil cost, an equitable adjustment should be made to the level of contributions sought. <p>The CIL charging schedule should be prepared in close collaboration with key site promoters.</p>	A decision has not yet been made regarding the implementation of CIL. Should the Council wish to introduce CIL then a charging schedule would be produced in consultation with a large number of organisations including key site promoters, and in accordance with the relevant regulations and guidance.	No amendment in response to this issue
25.13	DEL2	The Council cannot use planning obligations to fund desirable items of infrastructure. They must be directly related to the impacts of a specific proposal. A pre-requisite for requiring a contribution should be an	Part II of the policy makes it clear that planning obligations will only be sought where they are necessary to make a development acceptable in planning terms,	No amendment in response to this issue

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		assessment that identifies a qualitative deficiency within existing facilities to accommodate a development.	directly related to the development, and fairly and reasonably related in scale and kind to the development.	
25.14	DEL2 Part III	Support from HCC Ecology.	Support noted and welcomed.	No amendment in response to this issue

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